



25 January 2016

The Chairperson
EPA
The Atrium
168 St Georges Terrace
Perth, Western Australia 6000
Email: info@epa.wa.gov.au

Dear Dr Hatton

Referral for assessment under S38 of EP Act: DPAW proposal to issue a license for the taking of sandalwood from the wild (without a management plan or any other appropriate species management or conservation plan)

As you are aware the Environment Minister recently purported to approve an annual quota of 2,500 tonnes of wild sandalwood extraction for the ten year period from July 2016 to June 2026 (1,250 green; 1,250 dead).

This figure is far above any demonstrable or credible sustainable level and was clearly set on the basis of advice from the Forest Products Commission (FPC) which has a vested interest in setting the highest possible level of take – regardless of its long term consequences on the species.

The FPC is now calling for tenders for the extraction of this unsustainable amount of wild sandalwood.

According to documents obtained under FOI, DPAW proposes to now issue the FPC with a license authorising the taking of this species from the wild in accordance with the Wildlife Conservation Act and Sandalwood Act. See attached relevant excerpt from FOI – the full FOI is available for viewing on request.

The Wilderness Society (WA) Inc. hereby refers to the EPA for assessment the proposal by DPAW to issue a license for the commercial taking of native sandalwood from the wild over the ten year period between 2016 and 2026.

We believe the EPA has a legal obligation to assess this proposal given that:

1. The proposal is likely to have a significant impact on the environment, in this case the functional survival of a native flora species in the wild;
2. The Environment Protection Act requires the EPA to act to protect WAs environment from harmful and unsustainable activity:

An Act to provide for an Environmental Protection Authority, for the prevention, control and abatement of pollution and environmental harm, for the conservation,

preservation, protection, enhancement and management of the environment and for matters incidental to or connected with the foregoing.

[Long title amended by No. 54 of 2003 s. 27.]

3. Native Sandalwood has undergone a disastrous decline in distribution, population structure and species viability since European occupation due to a combination of landclearing, over-exploitation, introduced species, changed fire regimes and climate change;
4. DPAW's evidence to the Parliamentary Inquiry suggested that a sustainable take of green sandalwood from the wild would be in the order of 200 tpa, NOT an amount 600% above this;
5. DPAW has admitted that there is no current management plan in place for the conservation or exploitation of sandalwood in the wild – a situation completely at odds with the requirement for a management plan in relation to logging native forests in the south west;
6. DPAW and FPC have conceded that there is almost no regeneration of sandalwood occurring in the wild;
7. It is clear from DPAW's published advice to the Minister that no-one actually knows with any degree of reliability how much sandalwood there is, what its distribution and age structure is, and how sandalwood is faring as a species in the face of the combined impacts of climate change, changed fire regimes, introduced species, loss of native species and decades of excessive exploitation;
8. There has been no open, public, transparent and science-based assessment upon which to base ongoing exploitation of this beautiful native flora species – a situation which would not be acceptable in other circumstances and which cannot be acceptable in 2016.

While we have not received a formal response to our earlier referral to the EPA of the Minister's quota-setting process and decision, we assume the EPA carefully considered our referral and decided against an assessment at that stage – for reasons that we remain unaware of.

We believe there is no valid reason as to why the EPA cannot and should not now carry out an assessment of DPAW's proposed issuing of a license to take wild sandalwood at unsustainable levels and hope and trust that the EPA will act in accordance with its Act and the public interest in so doing.

Yours sincerely



Peter Robertson
The Wilderness Society WA Inc
City West Lotteries House
2 Delhi St
West Perth 6005



The sandalwood plunder continues without accountability.