Land, Rights, Laws: Issues of Native Title

Native Title Research Unit
Australian Institute of Aboriginal and Torres Strait Islander Studies

Editor: Lisa Strelein | Volume 2
September 1999 | Issues paper no. 3

The common law recognition of native title in the High Court's Mabo decision in 1992 and the Commonwealth Native Title Act have transformed the ways in which Indigenous peoples' rights over land may be formally recognised and incorporated within Australian legal and property regimes. The process of implementation has raised a number of crucial issues of concern to native title claimants and other interested parties. This series of papers is designed to contribute to the information and discussion.

The report of the historian who is called to prepare and give historical evidence in the native title process depends not only on the representation of 'historical facts' but also on the historian's analysis of these 'facts' and the presentation of an opinion based on this analysis. In this context the expert historian's opinion or voice is part of the process in which there are various agendas and audiences which comprise 'the other'. The professionalism of the historian involves the disciplined shaping of the historical narrative in this particular setting, a process in which the integrity and credibility of the historian are essential.

Dr Christine Choo is an historian who has been engaged in the preparation of historical evidence for native title litigation in relation to claims in the Kimberley, Pilbara and Murchison regions of Western Australia. Ms Margaret O'Connell, a graduate of Murdoch University, assisted Christine Choo in research for this paper.

Historical Narrative and Proof of Native Title [1]

Christine Choo and Margaret O'Connell

Introduction: How we tell the story makes a difference

Multiple and overlapping narratives can be found in litigation relating to native title claims. Witness statements, reports, opening and closing statements of the legal representation for all parties, as well as the court processes, presentation of these statements and reports, and the examination and cross-examination of witnesses in court, all are narratives. Each presentation constitutes a representation of a story which can be used as part of the evidence for or against the Indigenous applicants' claim for native title. The judge's decision and reasons for the decision comprise yet another narrative. Each narrative reflects a different discourse or perspective. The various narratives reflect different points of view, validating different parts of the history, different characters and situations in the story. In the litigation process counsel for opposing parties will attempt to discredit the witnesses in order to discredit the narrative and, thus, the evidence of the witnesses. There are levels, then, of interacting

Published by the Native Title Research Unit, AIATSIS, ntru.aiatsis.gov.au/publications.html
This material is copyright. Other than for personal study, no copying or sharing is allowed.
Contact Native Title Research Unit, AIATSIS, for permission to reproduce this material.

narratives, all weighted or valued differently in different contexts.

Under the current legislation the rules of evidence which are applied in the Federal Court must take into account 'the particular evidentiary difficulties faced by Aboriginal people in presenting such claims for adjudication and the evidence adduced must be interpreted in the same spirit, consistent with the judicial power vested in the Court under the Constitution.'[2] Justice Lee, who heard the Miriuwung and Gajerrong peoples' application for native title in 1997/98, drew attention to this point when he stated:

> If it is accepted that the Crown is presumed to have had knowledge of relevant circumstances and events concerning the burden of native title on its land at material times and to have access to all relevant resources, there can be no suggestion of unfairness in a trial process in which Aboriginal applicants are permitted to present their case through use of oral histories and by reference to received knowledge. [3]

The 'best evidence' principle applies, that is, the parties in the proceedings must seek out and present the best evidence to support their arguments in court. In native title claims in Australia, oral evidence given in court by the applicants and other Aboriginal people with direct knowledge of their history, culture and society, and of how these have been expressed and practiced in the past and present, and how they are transmitted to the future generations, is of vital significance and taken as best evidence. In *Ejai v. Commonwealth* Owen J of the Supreme Court of Western Australia stated that 'the best evidence lies in the hearts and minds of Aboriginal people'.[4]

Besides the evidence given by the applicants themselves as witnesses in the court proceedings, specialists may be called to assist the court. These expert witnesses come from any number of disciplines and may include anthropologists, archaeologists, geographers, cartographers, linguists and historians. [5]

Context for the application of the narrative in history

While the content of the reports and presentation of evidence are of vital significance, the form or vessel which holds the content, that is the way we tell the story, is also important.

Under current legislation, applicants for native title are required to establish their ongoing use and occupation of the land under claim. Historians are engaged in this process to provide an opinion based on their knowledge of the documentary sources about a particular group's occupation of the particular claim area, their activities on the land since the assertion of sovereignty and an account of the contact between Aboriginal and non-Aboriginal people in the claim area.

My discussion of narrative in history draws attention not only to the question of what is history and historiography, but also to the 'value added' component of the historian's work. Why a historian? What is the value of a historical narrative in the native title process? To begin to explore these questions I refer to Hayden White on the nature of narration and narrativity, and the historian's task:

> Historiography is an especially good ground on which to consider the nature of narration and narrativity because it is here that our desire for the imaginary, the possible, must contest with the imperatives of the real, the actual. If we view narration and narrativity as instruments with which the conflicting claims of the imaginary and the real are mediated, arbitrated, or resolved in a discourse, we begin to comprehend both the appeal of the narrative and the grounds for refusing it. [6]

Historical narrative goes beyond chronology because it imposes a discursive form on the events; transforming the events into a story, it gives meaning to the events by presenting the events, agents and agencies as elements of identifiable story types. The presentation of the historical evidence then becomes a performance, a telling of the story which engages the creative imagination. 'Performance', as described by Greg Denning, has connotations of sculpting, creation. It contains a sense of completion and 'has long held the connotation that the qualities of the duty done were heightened by being public, by having an audience. A performance is a consummation. A

Published by the Native Title Research Unit, AIATSIS, ntru.aiatsis.gov.au/publications.html
This material is copyright. Other than for personal study, no copying or sharing is allowed.
Contact Native Title Research Unit, AIATSIS, for permission to reproduce this material.

performance stands by itself in some way.' [7]

In the case of an historian who has obtained the story from (non-Indigenous) archival sources, historical narrative becomes the means through which the historian draws on their professional expertise and experience, examines these sources, interprets and composes the story which emerges from the documentary sources. The historian presents a narrative which can provide fresh insights into the issues pertinent to the native title process. This process is enhanced through the self-conscious use of the historian's expertise, background and personal experiences in the native title process.[8] Here we arrive at the creative process itself in which three aspects of the narrative come into focus – language and the cultural context of the judicial processes, roles of reader/audience and writer/storyteller, and interpretation.

The appropriate use of language in the context of legal proceedings

Native title litigation occurs in the context of the western legal system and therefore the historian must be aware of the prescribed codes of this system which comprise written, spoken and symbolic texts. The power differential between the judiciary and the ordinary persons, especially the applicants, is reinforced by the protocols of the court, for instance, the wearing of wigs and gowns. Even when attempts are made to dispense with much of such trappings of formality and some rules on the presentation of evidence when hearings are conducted on country, the report of the historian and the historian's appearance in court as an expert witness, if required, are presented in the context of formal court proceedings. Both report and appearance constitute texts to be read as part of the evidence.

The court process itself – the representation of the judiciary, the wigs and gowns, the formality and courtroom etiquette – reinforces the position of power held by the judiciary. This setting intimidates the ordinary person. In native title litigation, even when Aboriginal witnesses give evidence on country, the very presence of strangers, as well as the structure of the hearings can be intimidating, reinforcing the language of power. On the other hand, the formality can reinforce the gravity of the process. In court, the very method of examination and cross-examination of witnesses shapes the narrative as witnesses are questioned in a manner which attempts to favour a particular narrative over others. Each question and the way in which the question is asked by counsel for applicants or respondents shapes the narrative as every attempt is made by either side to squeeze out as much benefit as possible from the responses. Throughout this process it is vital that the witness responds to this examination with the utmost integrity, elaborating and supporting responses and drawing attention to the historical materials already filed in court.

The author and audience

The second important aspect of the narrative is the question of the relationship between author and audience. The construction of the historian's report demands enormous attention to detail and to narrative. In the native title processes there are multiple audiences – the applicants themselves, other historians and professionals, the lawyers working for all parties, the courts and the judges who hear the proceedings in the Federal Court. When presenting both verbal and written evidence, the historian must keep these multiple audiences in mind, use plain English uncluttered by jargon and accessible to all audiences. Each audience brings into play its own narratives and expectations. In this context the history report is written for the applicants, the judge and the court. The applicants are a most important audience. The historical narrative and collation of historical evidence from archival sources contains references to applicants and their immediate families and communities, and is largely based on what non-indigenous people have written and recorded about them. Since this material can be highly sensitive, I give serious consideration to issues relating to confidentiality and privacy.[9] Whatever the constraints the historian puts on content the first responsibility is to write in plain English in a direct and transparent form for the benefit of all audiences.

The history report is also written for solicitors and counsel who represent the applicants as well as the respondents. As an audience, solicitors demand precision and clarity in communication. Solicitors demand the organisation of 'facts' in a chronology, the assembly of 'evidence' in a manageable and accessible form. In short, they want a narrative which engages the reader. They

Published by the Native Title Research Unit, AIATSIS, ntru.aiatsis.gov.au/publications.html
This material is copyright. Other than for personal study, no copying or sharing is allowed.
Contact Native Title Research Unit, AIATSIS, for permission to reproduce this material.

appreciate a report which they can easily handle and use for their particular purposes and which they can quickly digest and incorporate into their own arguments and narratives. The historical narrative can be used as a means to educate this audience of legal professionals about both the content and the process of undertaking research, about the subtleties of the historian's interpretation and contextualisation of the events, people and places as well as the sources referred to in the report.

Another potential audience for the history report comprises other professional historians who may be engaged by the opposing party or parties. The history report must be written with historians clearly in view as it is this group who will expose the weaknesses in the argument and in the assembly of evidence to support the argument and the historical narrative. It is under the scrutiny and analysis of this audience, with its interest in competing narratives, that the expert historian's work is most public and exposed, particularly if the report becomes a contested document in court.

Once the process has reached the stage of litigation, the report must stand on its own, as a complete performance. The primary audience here is the judge and the court. In the end, the Federal Court judge is a most significant audience of the history report. The historian's responsibility, therefore, is writing with clarity and transparency in the arguments and narrative to make the most important materials easily accessible for a busy judge with a demanding task.

In an attempt to make the historical information and analysis accessible to the Court, I prepare historical reports which comprise two parts, a narrative and a section which presents a more detailed analysis of the historical material organised in relation to particulars or questions relevant to the proof of ongoing use and occupation of Aboriginal people in the claim area.[10] This analysis is tightly organised and cross-referenced to material contained in appended tables (which comprise another one or two volumes) in which evidence relating to the particulars is listed and ordered. The presentation of historical evidence is organised this way in order to make it as easy as possible for the various audiences to navigate within the material. This method also takes into account the particular requirements of the applicants and their descendants who then have a clear record of the documentary and archival material relating to themselves and their ancestors. The needs of the court are also taken into account as the material is categorised and documented very clearly, thus facilitating its use by all parties.

It is surprising how much historical evidence on the particulars exists in the documentary and archival sources alone. Our duty as historians responding to the lawyers' briefs is to record and present the historical material in a style which is most appropriate and accessible to the various audiences. The combination of the use of the narrative and highly structured tables enables the historian to respond to some of the information needs of the audiences. This demands the clear identification and understanding of the audiences of the reports and presentations in a situation in which the author is under a high level of public scrutiny.

Interpretation and intertextuality

The third consideration in the use of narrative is interpretation and intertextuality. Interpretation entails the question of how to understand the intended meaning of other texts. Intertextuality refers to the interdependence that any text has with a mass of others which preceded it. Any text entails the absorption and transformation of other texts, a principle which is particularly highlighted in the legal setting given its reliance on precedent. With each brief the historian is asked for their opinion and interpretation of the historical evidence. What does the historical record tell us about the group applying for native title? What does the historical record tell us about their presence, occupation and use of the land under claim? What does the historical record tell us about the use of the land by non-indigenous people? What is the historian's opinion on these questions?

The historian is one of numerous players in the native title process. The key players are the applicants themselves and the solicitors chosen by the applicants and the respondents to represent their respective interests. Other players include those from other professional disciplines who are engaged in the native title process. The historian, like other 'expert witnesses', is called on to undertake research and to prepare at least one expert report. This long and painstaking process begins with the brief from the solicitors outlining the questions which the briefing solicitors want

Published by the Native Title Research Unit, AIATSIS, ntru.aiatsis.gov.au/publications.html
This material is copyright. Other than for personal study, no copying or sharing is allowed.
Contact Native Title Research Unit, AIATSIS, for permission to reproduce this material.

the historian to answer. Already, other narratives come into play as the briefing solicitors have a strong sense or idea of what they want from the historian. Ideally, their brief should be clear and precise, thus helping the historian to further shape the report. The historian should have some access to the narratives, the body of knowledge, of the applicants. In my work for the Aboriginal Legal Service of Western Australia I have not been given direct access to applicants and have not collected oral histories from applicants. The solicitors consider it their responsibility to draw together all the evidence from various sources for presentation in court. It is preferable, however, for the historian and solicitors to engage in ongoing conversation of what is possible within the time limits available for the preparation of the history report. The research and preparation of the report could take many months of intensive work.

Each brief to the historian differs according to geographical location and region, the particular indigenous group and their history of ongoing use and occupation of their land and in their contact with non-indigenous people in the region. Invariably, this history of contact describes competition for control over land and other resources. I attempt to write the historical narrative in a style that engages the audience in examining the evidence which I have assembled in relation to the brief. There are a number of stages involved in the analysis of evidence of use and occupation of the claim area and much refinement of the analysis before inclusion in the report.

An analysis of the judgements of Lee J in *Ben Ward & Ors v. State of W.A. & Ors* and Olney J in the *Yorta Yorta v. State of Victoria & Ors* shows that the role of the instructing solicitors handling the applicants' case and counsel who led the evidence-in-chief is significant. It is their responsibility to ensure that the evidence on which they will rely is brought before the court and that the evidence is credible. In the *Yorta Yorta* case, no historian was called as an expert witness by the applicants, neither was a detailed history (based on documentary sources) of use and occupation of the claim area by applicants and their ancestors prepared for the court. The history which was presented as evidence by the applicants was included as part of the anthropologist's report. A historian could have assisted the court in the interpretation of particular historical documents the use of which became problematic for the applicants.[11] It appears that the legal profession has much to learn about history as a profession and the value of the processes, methodologies and analysis of professional historians who are not simply 'gatherers of facts'.

Expert historical evidence is more than a collection of 'facts' or the production of a chronology for the court. The very process of historical research and report writing entails a level of interpretation which makes explicit the presentation of implicit meaning in the material through the historian's opinion. According to Hayden White,

> [t]he creation of a historical narrative, then, is an action exactly like that which historical events are created, but in the domain of 'wording' rather than that of 'working'. By discerning the plots 'prefigured' in historical actions by the agents that produced them and 'configuring' them as sequences of events having coherency of stories with a beginning, middle, and end, historians make explicit the meaning the implicit in historical events themselves. [12]

In the preparation of historical reports for native title claims in Western Australia, including the cases of *Ben Ward & Ors*, I have drawn on a variety of documentary sources. These include the archived administrative files of the Aborigines Affairs Department and its predecessors; documents of the police department (journals of police officers, charge books, police station occurrence books), local court records; private diaries, journals and other documents of individuals who lived and worked in the area (especially the materials which may have been related to particular pastoral stations, mining activities or other industries in which non-indigenous people were engaged), the diaries and journals of explorers and surveyors who may have been the first non-indigenous people to enter the claim area; published and unpublished reports, articles and books; annual reports of government departments including the Aboriginal Affairs Department and its predecessors; parliamentary reports and debates; photographs, audio and video taped recordings; published and unpublished material generated by Aboriginal people themselves. There are a range of texts and different genres, all of which must be interpreted and analysed to provide a response to the brief. The analysis of the material entails a detailed examination of the texts and the compilation of materials into tables closely cross referenced to the narrative of the historian's report. The report and

Published by the Native Title Research Unit, AIATSIS, ntru.aiatsis.gov.au/publications.html
This material is copyright. Other than for personal study, no copying or sharing is allowed.
Contact Native Title Research Unit, AIATSIS, for permission to reproduce this material.

the accompanying tables in which the supporting evidence is assembled comprise a new narrative or text for the consideration of the court.

An important part of the interpretation and analysis of the documents entails the examination of the silences in documents generated by non-indigenous people about the indigenous occupants of the land. The apparent absence of Aboriginal people in the archival records and other publications generated by non-indigenous people cannot necessarily be interpreted as their absence from the land. It could mean that their presence was not thought to deserve comment in the texts. It is here that the historian's expertise and interpretation of the silences can assist the court in understanding the historical evidence by drawing on various perspectives offered by the texts, bringing together the patterns or schematised views which awake a response in the historian and presenting these perspectives in written or verbal form. 13 This is a dynamic process which awakens understanding.

In her first Boyer Lecture presented on 14 November 1999 the eminent historian, Inga Clendinnen, eloquently highlighted some of the significant processes in the application of an historical imagination and the need to examine the situation of the silent participants in a past event or series of events. Examining an incident which occurred when a French expedition landed in the south-west of Western Australia in 1801 in which a pregnant Aboriginal woman was closely examined by a group of Frenchmen under Nicholas Baudin, Clendinnen concludes,

> There is little point in apportioning blame close to two hundred years after the event. What interest me are two things. First is the intellectual and imaginative exercise we have just been through in doing this little bit of history: retrieving just what happened, thinking about its possible consequences, deciding from their words and actions just what the Frenchmen were up to and the kind of men they were, and doing our best to imagine the thoughts and feelings of the silent players in the scene. Second, there is the separate matter of clarifying and examining our own responses to what happened.14

The retrieval of what happened and the examination of our own responses are processes germane to historical analysis. Then we have to communicate the outcome of these processes to a wider audience with clarity.

Conclusions

In this paper we have examined aspects of the role of the historian as an 'expert witness' in the native title process using the framework of the narrative as my tool of analysis. Our understanding and use of the term 'narrative' is set within the hostile context of native title litigation in which the work of the historian and their professional integrity are under intense public scrutiny. An unfortunate part of the litigation process involves attempts to discredit the work of the expert witness – the methodologies, sources, historiographical approaches and presentation of historical narrative – and to cast doubt on the integrity and veracity of the witness. This can be a personally harrowing process for the witness. These reflections bring to the fore a number of challenges in relation to the work of historians within the native title process. How are our methods and historiographical approaches challenged or shaped by the intense scrutiny? How does our insight into some of these processes affect the narratives and therefore the form of our work as historians in this context?

The challenge is for us to produce historical reports and narratives which attend to the requirements of the particular audiences of these narratives, to give attention to detail in the presentation of these reports, to be self-conscious in our use of language and historiography, and to produce narratives which contain the distillation of our findings and our analysis of these findings. We must at all times remind ourselves that our work is to assist the court in the determination of native title.

And we must tell the story well.

---

1. This paper was first presented as 'Historical Narrative and its Application in Proof of Native Title' at Land and Freedom, Australia and New Zealand Law and History Society International

Published by the Native Title Research Unit, AIATSIS, ntru.aiatsis.gov.au/publications.html
This material is copyright. Other than for personal study, no copying or sharing is allowed.
Contact Native Title Research Unit, AIATSIS, for permission to reproduce this material.

Conference, 9–11 July 1999, Newcastle, New South Wales. Where the first person singular is used in this paper it refers to the principal author, Christine Choo, on whose experience this paper is based.

2. *Ben Ward & Ors v. W.A. & Ors*, 24 November 1998, p. 31.

3. Loc. cit.

4. *Ejai v. Commonwealth*, NTS.

5. For a guide to what constitutes 'expert evidence' refer to Federal Court of Australia and the Law Society of Australia, *Guidelines for Expert Witnesses in Proceedings in the Federal Court of Australia*, 15 September 1998, http://www.fedcourt.gov.au/practice.htm/praticed1.htm See Christine Choo, 'Historians and Native Title: The Question of Evidence', paper delivered at the Australian Historical Association Conference Sydney, 1998, edited for publication in Diane Kirkby (ed.) forthcoming, for a discussion of the acceptance of the evidence of expert historians in native title claims.

6. Hayden White, *The Content of the Form: Narrative Discourse and Historical Representation*, Baltimore & London: John Hopkins University Press, 1987, pp. 4, 5.

7. Greg Denning, *Performances*, Melbourne University Press, 1996, p. xiii.

8. Christine Choo, 'On the Edge and In Between: The Experience of an Asian-Australian Historian', *Oral History Association of Australia Journal*, No. 20, 1998, pp. 34–40.

9. Refer especially to Stephen Schnierer and Glen Woods, 'An Indigenous Perspective on Ethical Research Practices in Protected Areas', *Australian Journal of Environmental Management Fenner Conference Supplementary Edition*, November 1998, pp. 39–45; also to CCH Australia Limited, *Federal Privacy Handbook*, p. 10 'Privacy Protocol for Commonwealth Agencies in the NT: Personal Information of Aboriginal and Torres Strait Islander People'.

10. Readers may find useful the following particulars of customs, laws, practices and usages giving rise to the group's relationship with and connection to the land:

[The Group] possessed, occupied, used and enjoyed the Land.

[The Group] resided on the Land.

[The Group] maintained a nomadic way of life on the Land.

[The Group] derived sustenance from the Land.

[The Group] hunted and gathered food on the Land.

[The Group] bore, reared and taught their children on the Land.

[The Group] built and used shelter on the Land.

[The Group] held ceremonies on the Land.

[The Group] held ceremonies concerning the Land.

[The Group] conducted Law Business on the Land.

[The Group] held meetings on the Land for secular purposes.

Published by the Native Title Research Unit, AIATSIS, ntru.aiatsis.gov.au/publications.html
This material is copyright. Other than for personal study, no copying or sharing is allowed.
Contact Native Title Research Unit, AIATSIS, for permission to reproduce this material.

[The Group] held meetings on the Land for spiritual purposes.

[The Group] dug for and used stones, ochres and minerals on and from the Land.

[The Group] cared for the Land according to environmental requirements.

[The Group] assumed responsibility and acknowledged a spiritual obligation to care for the Land and particular places on the Land.

[The Group] cared for the Land pursuant to spiritual obligations.

[The Group] cared for the Land by burning the Land, harvesting produce and conducting Law Business.

[The Group] men and women maintained and passed on to younger generations spiritual knowledge of the Land.

[The Group] men and women maintained and passed on to younger generations geographical, topographical, environmental and climatic knowledge of the Land.

[The Group] shared, exchanged and/or traded resources derived on and from the Land.

[The Group] knew and avoided particular places on the Land.

[The Group] knew and avoided spiritually dangerous places on the Land.

[The Group] recognised particular connections of an individual to particular parts of the Land.

[The Group] recognised particular connections of an individual to particular parts of Land by reference to multiple criteria. Such connections were recognised by reference to one of a number of the following:

Place of birth, Place of mother's birth, Place of father's birth, Descent, Marriage, Kinship ties, Residence, Initiation and ritual entitlement, Spiritual affiliation, Caretakership of country and objects.

[The Group] regulated access to parts of the Land according to initiation status, status of spiritual knowledge and gender.

[The Group] regulated access to the Land by persons who were not members of [The Group].

[The Group] prevented the Land being harmed physically and spiritually by observing or engaging in the customs, laws, practices and usages referred to in the sub paragraphs above.

11. *Members of the Yorta Yorta Community v. The State of Victoria & Ors [1998] 1606 FCA* 18 December 1998, 26, 118–121.

12. White, *The Content of the Form*, Baltimore, Johns Hopkins University Press, p. 174.

13. Wolfgang Iser, 'The Reading Process: A Phenomenological Approach' in David Lodge (ed.) *Modern Criticism and Theory: A Reader*, London & New York: Longman, 1988, p. 212.

14. Inga Clendinnen, 'Incident on a Beach', Lecture One, Boyer Lecture, 14 November 1999, http://www.abc.net.au/rn/events/boyer99.htm; now published in hardcopy.

Published by the Native Title Research Unit, AIATSIS, ntru.aiatsis.gov.au/publications.html
This material is copyright. Other than for personal study, no copying or sharing is allowed.
Contact Native Title Research Unit, AIATSIS, for permission to reproduce this material.

Land, Rights, Laws: Issues in Native Title are interdisciplinary discussions of current topics in native title written at an academic level. Each issue receives anonymous peer review and the series receives oversight by an advisory committee external to the Native Title Research Unit's editorial team.

Funded through a grant from ATSIC, 380 copies are distributed free of charge to practitioners and the general public interested in native title. These include individuals, Representative Bodies, Land Councils, libraries, and Indigenous organisations.

To subscribe or receive previous issues contact the Native Title Research Unit, Australian Institute of Aboriginal and Torres Strait Islander Studies, GPO Box 553, Canberra, ACT 2601 (ph. 02 6246 1161). To submit a paper or suggest a topic for a future issue contact the Unit (ph. 02 6246 1183).

Native Title Research Unit

Australian Institute of Aboriginal and Torres Strait Islander Studies

Acton House Marcus Clarke Street Acton

GPO Box 553 Canberra ACT 2601

Telephone 02 6246 1161 Facsimile 02 6249 1046

Email ntru@aiatsis.gov.au

Views expressed in this series are not necessarily those of the Australian Institute of Aboriginal and Torres Strait Islander Studies.

Published by the Native Title Research Unit, AIATSIS, ntru.aiatsis.gov.au/publications.html
This material is copyright. Other than for personal study, no copying or sharing is allowed.
Contact Native Title Research Unit, AIATSIS, for permission to reproduce this material.