What's New - June 2011

1. Cases

***Roberts v Northern Territory of Australia* [2011] FCA 242**
***Roberts v Northern Territory of Australia* [2011] FCA 243**
18 March 2011
Mansfield J
Federal Court of Australia, Darwin
In these matters Mansfield J ordered that two amendments be made to the relevant applications. Both amendments were unopposed. The first removed the name of a deceased applicant. The second replaced the existing application with a "Further Amended Application". The effect of the Further Amended Application was to insert a reference to the Guyanggan Nganawirdbird Group in the description of the applicant, to revise the description in the application of the native title claim group and native title rights and interests claimed, the addition of an example of traditional physical connection, the replacement of references to the Yangman-Mangarrayi People with references to the Najig and Guyanggan Nganawirdbird Groups, and some other procedural matters.

***Hill on behalf of the Yirendali People Core Country Claim v State of Queensland* [2011] FCA 472**
3 May 2011
Logan J
Federal Court of Australia, Brisbane
The applicants in this matter were required by Logan J to show cause why the proceedings should not be dismissed. Logan J referred to a number of occasions on which the applicants had been in default of previous orders, and was considering his power to dismiss the application under O 35A of *the Federal Court Rules* (Cth). His Honour noted that mere default was sufficient to allow him to dismiss, but the evidence already before the Court indicated that there was sufficient substance in the claim that a dismissal would not be appropriate in the circumstances. Mansfield J made directions for the conduct of the application for the following 14 months. It sets out a timetable for work to be completed by the consultant anthropologist and consultant historian, with a preliminary connection report and a historical report to be completed by November 2011, periodic progress reports to be provided after that, and the final connection report to be completed by August 2012.

***Starkey v State of South Australia* [2011] FCA 456**
09 May 2011
Mansfield J
Federal Court of Australia, Adelaide
This decision by Mansfield J removes Mr Ningil Richard Reid, a senior law man, as a respondent to the Kokatha Uwankara native title application. Mr Reid is a member of the Kokatha Uwankara claim group, but nevertheless applied to become a separate party, which resulted in him becoming a respondent to the application. Mr Reid applied to become a party because he disputes the authority of the current named applicants to make the native title claim on behalf of the claim group. The issue before the Court was whether Mr Reid should be permitted to remain as a party to the proceeding, or whether it should be ordered that he cease to be a party, pursuant to s 84(8) of the *Native Title Act 1993* (Cth).

Mansfield J considered that the power to remove a party under s 84(8) involved a broad discretion, similar in breadth to the discretion to join a party under s 84(5), and involving similar considerations. He held that while

there is no legal impediment to a member of a claim group being a respondent party to the claim, the circumstances in which a "dissentient" member of a claim group will be permitted to be a respondent party will be rare. Claim groups are empowered by ss 251B and 66B to choose the person or persons who will represent them in the application, and such choice is to be made by traditional law and custom (if any) or by an agreed process. Unanimity is not required for ss 251B or 66B unless the traditional or agreed processes involve unanimity. Mansfield J considered that the Act does not allow individual dissenting members of a claim group to routinely play a direct role in the presentation of the case. Mr Reid had argued that, according to traditional law and custom, he was the only person capable of authorising the claim. Mansfield J did not consider that Mr Reid had presented sufficient material to establish this.

Mansfield J held that it would not be in the interests of justice for Mr Reid to remain a party to the proceeding, on the grounds that his continued status as a respondent would be likely to cause unwarranted costs and delays, interfere with the claim's progress towards consent determination, and was not supported by any other sufficient reason. Further, Mansfield J drew attention to an alternative procedural avenue available to Mr Reid, namely to apply under s 84D(2)(c) for an order requiring the named applicants to produce evidence that they are authorised to make the claim.

***Barunga v State of Western Australia* [2011] FCA 518**
26 May 2011
Gilmour J
Federal Court of Australia, Yaloon
This is a consent determination for the Wanjina-Wunggurr Dambimangari claim in the Kimberley. The parties agreed to the dismissal of an application in respect of the land and waters of Cone Island. The Court made orders in terms of the Minute of Proposed Consent Determination filed by the parties, to the effect that native title exists in relation to the Determination Area. The applicant nominated the Wanjina-Wunggurr (Native Title) Aboriginal Corporation RNTBC to hold the determined native title in trust for the native title holders. The Court ordered, by consent, that the Wanjina-Wunggurr (Native Title) Aboriginal Corporation RNTBC and the State of Western Australia enter into negotiations in good faith to reach agreement on the relationship between the native title rights and interests recognised in the Determination Area, and the non-native title rights and interests which exist on the land and waters within the Determination Area.

***Long v Northern Territory of Australia* [2011] FCA 571;**
***Rosewood v Northern Territory of Australia* [2011] FCA 572;**
***Button Jones v Northern Territory of Australia* [2011] FCA 573;**
***Paddy v Northern Territory of Australia* [2011] FCA 574;**
***Simon v Northern Territory of Australia* [2011] FCA 575;**
***Carlton v Northern Territory of Australia* [2011] FCA 576;**
31 May 2011
Mansfield J
Federal Court of Australia, Jinumum Walk

These six judgments are consent determinations, made at the same hearing, over land and waters within the bounds of several pastoral leases in the Northern Territory:

- Auvergne Pastoral Lease (Long on behalf of the Gajerrong-Ngalinjar, Ngarinyman-Wulayi, and Ngarinyman-Nyiwanawam groups);
- Rosewood Pastoral Lease (Rosewood on behalf of the Miriuwung-Larru, Miriuwung-Mambitji, Miriuwung-Gudim, and Malngin-Yunur-Jurrtakal groups);
- Newry Pastoral Lease (Button Jones on behalf of the Miriuwung-Damberal, Miriuwung-Nyawam Nyawam, Miriuwung-Gudim, and Ngarinyman-Nyiwanawam groups);
- Bullo River Pastoral Lease (Paddy on behalf of the Gajerrong-Pulthuru, Gajerrong-Ngalinjar, Gajerrong-Gurrbijim, and Gajerrong-Djarradjarrany groups);
- Legune Pastoral Lease (Simon on behalf of the Gajerrong-Wadanybang, Gajerrong-Gurrbijim, and Gajerrong-Djarradjarrany groups);
- Spirit Hills Pastoral Lease (Carlton on behalf of the Miriuwung-Nyawam Nyawam, Miriuwung-Bindjen, Gajerrong-Gurrbijim, Gajerrong-Djarradjarrany, Gajerrong-Djandumi group, and Gajerrong-Wadanybang groups).

In each case, Mansfield J made orders in the terms agreed by the parties, noting that s 87 of the *Native Title Act*1993 (Cth) requires that the agreement between the parties be in writing, that the orders sought be both

within the power of the Court and appropriate in the opinion of the Court. His Honour quoted North J in *Lovett on behalf of the Gunditjmara People v State of Victoria* [2007] FCA 474, who had stated that the Court is not required to examine whether the agreement is grounded on a factual basis which would satisfy the Court at a hearing of the application.

Two matters remain outstanding in each of these claims. First, the determination provides for an Aboriginal corporation to be nominated to the Court within 12 months, to be the prescribed body corporate for the purposes of s 57 of the Act. Second, the parties may apply to the Court to establish the precise location of certain public works and other improvements within the Determination Area, in relation to extinguishment issues.

***Campbell v Northern Territory of Australia* [2011] FCA 580;**
***Wavehill v Northern Territory of Australia* [2011] FCA 581;**
***King v Northern Territory of Australia* [2011] FCA 582;**
***Young v Northern Territory of Australia* [2011] FCA 583;**
***Wavehill v Northern Territory of Australia* [2011] FCA 584;**
***Young v Northern Territory of Australia* [2011] FCA 585;**
2 June 2011
Mansfield J
Federal Court of Australia, Pigeon Hole
These six judgments are consent determinations, made at the same hearing, over land and waters within the bounds of several pastoral leases in the Northern Territory:

- Camfield Pastoral Lease (Campbell on behalf of the Ngapurrpinkakujarra, Narrwan, Walanypirri, Yingawunarrri, Purruruka, Yilyilyimarri, Japuwuny-Wijina, Bilnara, and Wampana Groups);
- Dungowan Pastoral Lease (Wavehill on behalf of the Ngapurrpinkakujarra, Narrwan, Walanyipirri, Yingawunarri, and Narlwan Groups);
- Montejinni East Pastoral Lease (King on behalf of the Ngapurrpinkakujarra, Yingawunarri, and Purrurruka Groups);
- Montejinni West Pastoral Lease (Young on behalf of the Nirrina, Yingawunarri, Purrurruka, Yilyilimarri, and Billinara Groups);
- Birrimba Pastoral Lease (Wavehill on behalf of the Ngapurrpinkakujarra, Yingawunari, Narlwan, Luwaja, Tururrutpa, and Beregumayin-Ngarrajanaggu Groups);
- Killarney Pastoral Lease (Young on behalf of the Ngapurrpinkakujarra, Yingwunarri, Liwi, Luwaja, Nirrina, and Beregumayin-Ngarrajanaggu Groups).

In each case, Mansfield J made orders in the terms agreed by the parties, noting that s. 87 of the *Native Title Act* 1993 (Cth) requires that the agreement between the parties be in writing, that the orders sought be both within the power of the Court and appropriate in the opinion of the Court. His Honour quoted North J in *Lovett on behalf of the Gunditjmara People v State of Victoria* [2007] FCA 474, who had stated that the Court is not required to examine whether the agreement is grounded on a factual basis which would satisfy the Court at a hearing of the application.

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***Dodd on behalf of the Gudjala People Core Country Claim #1 v State of Queensland* [2011] FCA 690**
17 June 2011
Logan J
Federal Court of Australia, Brisbane
This judgment of Logan J dealt with the procedural requirements to remove a person from the list of named applicants. Mr William Santo no longer wished to be named as an applicant, but the other named applicants wished to continue with the application. The Commonwealth argued that such a change to the list of applicants would have to be freshly authorised by the claim group, because of the requirements of s 66B *Native Title Act* 1993 (Cth). The remaining applicants argued that the Court was empowered either by s 66B or by O 6 r 9 of the *Federal Court Rules* to grant their application jointly to replace the current list of applicants with one which omitted Mr Santo.

The question for Logan J was whether s 66B is the only means available to amend the applicant to a native title application, and whether every amendment required a fresh authorisation by the claim group. Logan J considered the expense, delay and inconvenience which this interpretation would entail, and viewed s 66B as conferring a discretionary power rather than a mandatory obligation on the claimant group to authorise new applicants. Logan J examined the evidence of the original authorisation of the named applicants, and found that it was not expressed in terms of joint authority, but rather authorised each of the named persons personally. Since the remaining applicants wished to remain in their representative role and retained the authorisation of the claim group, and since Mr William Santo did not wish to continue and consented to his removal, s 66B empowered the Court to remove Mr Santo from the application. Further, the Court had the additional power to make the relevant order under O 6 r 9 of the *Federal Court Rules*.

***Dillon on behalf of the Barunggam People v State of Queensland* [2011] FCA 713**
23 June 2011
Reeves J
Federal Court of Australia, Brisbane
Reeves J dismissed the application in this matter under s 190F(6) of the *Native Title Act* 1993 (Cth). On 16 September 2010, a delegate of the Native Title Registrar refused to accept the application, on the grounds that the application did not satisfy the requirements of ss 190B(5)(b) and (c), 190B(6) and 190B(7). These subsections relate to the Registrar's assessment of the factual basis for the assertion of the native title rights and interests, the prima facie possibility of establishing the rights and interests, and the traditional physical connection to any part of the relevant land or waters of at least one member of the claim group. Reeves J had previously given the applicants the opportunity to amend the application, but Counsel for the applicants at the hearing of the dismissal motion conceded that, based on his discussions with four of the six named applicants there was "little realistic hope of overcoming the impediments" presented by s 190F(6). Reeves J was satisfied of the relevant conditions for dismissal in s 190F(5) and (6): that all of the avenues identified in s 190F(5)(b) of the Act have been exhausted; that the application was not likely to be amended such that the Registrar would be likely to come to a different conclusion; and that there was no other reason why the application should not be dismissed.

***Atkinson on behalf of the Mooka and Kalara United Families Claim v Minister for Lands for the State of New South Wales* [2011] FCA 701**
23 June 2011
Jagot J
Federal Court of Australia, Sydney
This judgment arose from a motion before Jagot J to set aside orders made on 1 October 2010 – self-executing orders which would dismiss the application if certain steps were not taken by 29 October 2010 (steps which were in fact not taken by that date). The applicants' primary submission was that they would suffer substantial prejudice if their native title application were dismissed. Because many of the key knowledge-holders were elderly, there was a risk that they would pass away or be otherwise unable to give evidence by the time a fresh application was authorised, filed, registered, and brought on for trial. Despite that, Jagot J dismissed the motion, and further ordered that no additional application seeking to reinstate the proceeding could be made without leave of the Court.

Jagot J accepted the NSW Minister for Lands' submission that, because of the self-executing nature of the October orders, the present motion was essentially an application to vary orders before they are entered (O 35 r 7(1) *Federal Court Rules*), rather than an application to dismiss a proceeding under the *Native Title Act* 1993 (Cth). Accordingly, the applicant's arguments by reference to ss 94C(3) and 190F(6) – both dealing with the exercise of discretion to dismiss a native title application – were of little weight. Instead, Jagot J applied common law tests which prescribed that the power to vary orders be exercised cautiously, and that variation was an indulgence rather than a right of parties. His Honour noted that the delay which was said to be prejudicial to the applicants was in fact due to their own decisions. Jagot J did not consider that the application's prospects of passing the registration were relevant to the exercise of his power to vary the dismissal orders, but noted the Minister's view that the application would be unlikely to pass the registration test. His Honour noted generally the applicants' failure to meet previous deadlines ordered for the filing of evidence.

***Aplin on behalf of the Waanyi People v State of Queensland (No 2)* [2010] FCA 1326;**
12 October 2010
Dowsett J
Federal Court of Australia, Brisbane
***Aplin on behalf of the Waanyi Peoples v State of Queensland (No 3)* [2010] FCA 1515**
9 December 2010
Dowsett J
Federal Court of Australia, Century Zinc Mine
These two judgments of Dowsett J concern a motion that was heard on 12 October 2010 and a native title determination made on 9 December 2010. The reasons for judgment were published on 14 June 2011. The main issue in both judgments related to whether or not one Indigenous respondent, Mr Gregory Lloyd Phillips, was a Waanyi man and therefore a part of the claim group. In a previous hearing, Dowsett J had considered the Waanyi people's traditional laws and customs concerning that question, and made binding declarations to the effect that, while Mr Phillips' great-grandmother had been recognised as Waanyi by some Waanyi during her lifetime, contemporary Waanyi did not now recognise her as Waanyi. Accordingly, Mr Phillips was not recognised under Waanyi laws and customs as a Waanyi man. There was no appeal from those findings.

In the first judgment ([2010] FCA 1326) the applicants had applied to remove Mr Phillips as a party to the proceedings (s 84(8) *Native Title Act* 1993 (Cth), O 6 r 9 *Federal Court Rules*), and Mr Phillips applied for orders to adjourn the application until the claim group reconsider their exclusion of Mr Phillips' great-grandmother from the list of known Waanyi ancestors, in light of the declarations made at the earlier hearing. On the s 84(8) motion, Dowsett J considered that Mr Phillips should remain a party, in light of his ongoing interest in this matter and the factual concessions that he had made. While Dowsett J's earlier decision may have effectively left Mr Phillips without any prospect of success in the proceedings, his Honour considered it valuable for Mr Phillips' factual concessions to be incorporated into the eventual determination so that they would be clearly binding upon him as a party to the proceedings. On Mr Phillips' motion, Dowsett J doubted the Court's power to make the orders sought. His Honour concluded from evidence brought by Mr Phillips that the Waanyi applicants demonstrated an ongoing reluctance to recognise Mr Phillips' great-grandmother as an apical Waanyi ancestor. There was, however, no legal remedy available to Mr Phillips in respect of that reluctance. Mr Phillip's motion was dismissed. Dowsett J noted that the claim group's description in the application is drawn in a way which would not exclude the inclusion of new members as apical ancestors after the determination, if the native title holders conclude that they are in fact apical ancestors.

The second judgment ([2010] FCA 1515) was the determination of native title. The Court determined that native title exists in relation to the Determination Area. It was not, according to Dowsett J, technically a consent determination since Mr Phillips remained a party and did not consent to the making of the orders. Yet his Honour considered that all of the matters which needed to be resolved in order to justify a determination as to the existence of native title, had been resolved as between all of the parties (including Mr Phillips). On 8 November 2010, all of the parties except Mr Phillips had filed an agreement on the terms of a proposed determination of native title, as well as a statement of agreed facts and contentions. Mr Phillips had admitted the facts pleaded by the applicant in the statement of claim except for those pertaining to the description of the native title claim group. In light of these admissions, together with the declarations Dowsett J had made previously as to Mr Phillips' status as a Waanyi man, his Honour considered that there were no outstanding factual disputes as between Mr Phillips and any of the other parties. Dowsett J made findings of fact based on the evidence before the Court and on the statement of agreed facts, and accordingly made the determination that native title exists in relation to the Determination Area. Note that the Court's orders which make the determination will not take effect unless and until an indigenous land use agreement referred to in a Schedule is registered. Should that agreement not be registered within 6 months of the date of the orders, the matter is to be listed for further directions.

2. Legislation

National

Native Title Amendment (Reform) Bill 2011

On 12 May 2011 the Senate referred the Native Title Amendment (Reform) Bill 2011 for inquiry and report. The Bill amends the Native Title Act 1993 to effect reforms that address two key areas for native title claimants: the barriers claimants face in making the case for a determination of native title rights and interests; and procedural issues relating to the future act regime. These measures include: the application of the principles of the United Nations Declaration on the Rights of Indigenous Peoples to decision-making; heritage protection; the application of the non-extinguishment principle to the compulsory acquisition of land; the right to negotiate to apply to offshore areas; good faith negotiations; profit sharing and royalties in arbitration; enabling extinguishment to be disregarded; burden of proof; the definition of 'traditional'; and commercial rights and interests. Submissions should be received by 29 July 2011. The reporting date is 20 September 2011.

- Text of Bill
- Explanatory Memorandum
- Further Inquiry information

South Australia

The amendments to the *Mining Act 1971* (SA), and the associated *Mining Regulations 2011*, will commence on 01 July 2011.

Amendments and Regulations:

- Mining Act 1971 incorporating the amendments
- Mining (Miscellaneous) Amendment Bill 2010
- Mining Regulations 2011

3. Indigenous Land Use Agreements

- In June 2011, **2** ILUA were registered with the National Native Title Tribunal (NNTT). See table below for more details.
- The Native Title Research Unit maintains an ILUA Summary which provides hyperlinks to information on the NNTT and ATNS websites.
- For more information about ILUAs, see the NNTT Website: ILUAs
- Further information about specific ILUAs is available in the Agreements, Treaties and Negotiated Settlements (ATNS) Database.

Date	NNTT File No.	Name	Type	State/Territory	Subject Matter
10/06/2011	DI2011/004	Tennant Creek Corrections Facility ILUA	BCA	NT	Government
29/06/2011	DI2011/001	Dulcie Ranges Commnuity Living Area ILUA	AA	NT	Community living area; Development

4. Native Title Determinations

- In June 2011, **6** native title determinations were handed down. See table below for further details.
- The Native Title Research Unit maintains a Determinations Summary which provides hyperlinks to determination information on the Austlii, NNTT and ATNS websites.
- Also see the NNTT Website: Determinations
- The Agreements, Treaties and Negotiated Settlements (ATNS) Database provides information about native title consent determinations and some litigated determinations.

Date	Short Name	Case Name	State/ Territory	Outcome	Legal Process
02/06/2011	Camfield Pastoral Lease	Campbell v Northern Territory of Australia [2011] FCA 580	NT	Native title exists in parts of the determination area	Consent determination
02/06/2011	Dungowan Pastoral Lease	Wavehill v Northern Territory of Australia [2011] FCA 581	NT	Native title exists in parts of the determination area	Consent determination
02/06/2011	Montejinni East Pastoral Lease	King v Northern Territory of Australia [2011] FCA 582	NT	Native title exists in parts of the determination area	Consent determination
02/06/2011	Montejinni West Pastoral Lease	Young v Northern Territory of Australia [2011] FCA 583	NT	Native title exists in parts of the determination area	Consent determination
02/06/2011	Birrimba Pastoral Lease	Wavehill v Northern Territory of Australia [2011] FCA 584	NT	Native title exists in parts of the determination area	Consent determination
02/06/2011	Killarney Pastoral Lease	Young v Northern Territory of Australia [2011] FCA 585	NT	Native title exists in parts of the determination area	Consent determination

5. Registered Native Title Bodies Corporate

The Native Title Research Unit maintains a Registered Native Title Bodies Corporate Summary document which provides details about RNTBCs in each state/territory including the RNTBC name, RNTBC type (agent or trustee) and relevant native title determination information. Additional information about the RNTBC can be accessed through hyperlinks to corporation information on the Office of the Registrar of Indigenous Corporations (ORIC) website; case law on the Austlii website; and native title determination information on the NNTT and ATNS websites.

6. Public Notices

The *Native Title Act 1993* (Cth) requires that native title parties and the public must be notified of:

- proposed grants of mining leases and claims;
- proposed grants of exploration tenements;
- proposed addition of excluded land in exploration permits;
- proposed grant of authority to prospect; and
- proposed mineral development licences.

The public notice must occur in both:

- a newspaper that circulates generally throughout the area to which the notification relates
- a relevant special interest publication that:
    - caters mainly or exclusively for the interests of Aboriginal peoples or Torres Strait Islanders;
    - is published at least once a month; and
    - circulates in the geographical area of the proposed activities.

To access the most recent public notices visit the NNTT website or the Koori Mail website.

7. Native Title in the News

The Native Title Research Unit publishes Native Title in the News which contains summaries of newspaper articles and media releases relevant to native title.

8. Native Title Publications/Resources

Native Title Resource Guide (NTRG)
The NTRG provides a summary of resources and information relating to key areas of native title. The guide provides information pertaining to:

- Native title legislation and case law;
- Federal, State and Territory Governments' native title policies and procedures;
- Native title representative bodies, registered native title bodies corporate, government agencies and other organisations involved in native title;
- Native title applications and determinations;
- Indigenous Land Use Agreements, future acts and other native title related agreements;
- Land rights legislation;
- Indigenous Land Corporation acquisitions;
- Indigenous Protected Areas; and
- Indigenous population profiles

Information is gathered through a range of sources including Agreements, Treaties and Negotiated Settlements Project; Native Title Representative Bodies; the National Native Title Tribunal; the Indigenous Land Corporation; The Office of the Registrar of Aboriginal and Torres Strait Islander Corporations; federal, state and territory government departments; the Federal Court and the Australasian Legal Information Institute and many more.

Information is provided at a national level as well as relating to each state and territory:

- National Overview ()
- Australian Capital Territory (including Jervis Bay) ()
- New South Wales()
- Northern Territory ()
- Queensland ()
- South Australia ()
- Tasmania ()
- Victoria ()
- Western Australia ()

Speeches from the Native Title Conference 2011:
The following speeches are available for download from the Native Title Conference website:

- Chief Justice of the Federal Court - Patrick Keane ()
- Mick Gooda ()
- Rowan Foley ()
- Jilpia Jones ()
- Pam McGrath ()
- Sturt Glacken ()

9. Training and Professional Development Opportunities

See the Aurora Project: 2011 Program Calendar for information about Learning and Development Opportunities for staff of native title representative bodies and native title service providers.

University of Queensland
A new course will be offered at the University of Queensland covering theoretical areas and attend to practical skills involved in native title research. The course draws on the growing literature in this area of applied anthropology and canvass some relevant international comparative anthropological work from selected other countries.

The course will be offered in the Summer Semester of 2011/2012 (30 November 2011 – 11 February 2012). For more information including information about enrolments and aspects of the course visit the University of Queensland - School of Social Science website.

Centre of Native Title Anthropology (CNTA) - ANU
2011 programs and workshops

- Research writing placements for practicing native title anthropologists
- Student fieldwork placements for 3rd year anthropology students
- Conference Workshop exploring options for accreditation of native title anthropologists

CNTA is also be involved with the ANU/Attorney-General's Department Native Title Field School hosted by ANU Enterprise and staff from the ANU School of History, Culture and Language. Expressions of Interests to attend the Field School are now open. See the CNTA workshops and courses page for more information.

10. Native Title Research Unit Publications Survey

Obtaining feedback from those that read NTRU publications is vital to keep our publications relevant and informative. We would appreciate if you could spend approximately 5 minutes to complete the following survey. All responses will be compiled together and analysed as a group. Responses will not be identified by individual. We thank you for your assistance.

CLICK HERE TO COMPLETE SURVEY

If you have any questions or concerns, please contact Matthew O'Rourke, Research Officer at the Native Title Research Unit on (02) 6246 1158 or morourke@aiatsis.gov.au