

**INQUIRY INTO ABORIGINAL CULTURAL HERITAGE
(CULTURE IS IDENTITY) BILL 2022**

Organisation: Aboriginal Cultural Heritage Advisory Committee (ACHAC)
Date Received: 14 September 2022

Submission to the Legislative Council Portfolio Committee No 7

Aboriginal Cultural Heritage (Culture is Identity) Bill 2022

The Aboriginal Cultural Heritage Advisory Committee (ACHAC) was established in 2006 under the *National Parks and Wildlife Act 1974*. ACHAC is constituted by 13 Aboriginal people with expertise in Aboriginal cultural heritage, including a member nominated by each of the Native Title Services Corporation (NTSCorp), the NSW Aboriginal Land Council (NSWALC) and the Heritage Council of NSW. The Executive Director of Heritage NSW (representing the Secretary of the Department of Planning and Environment) is a non-voting member.

A core role of the Committee is to give independent advice to the Minister responsible for Heritage and to the Executive Director of Heritage NSW on any matter relating to the identification, assessment and management of Aboriginal cultural heritage in NSW.

ACHAC would like to affirm that for over a decade ACHAC has prioritised better protection for Aboriginal cultural heritage through (world best practice) ACH reform.

Submission approach

1. The Inquiry's Terms of Reference give minimal guidance for submission writing. We note that the time allowed for public responses is very short, precluding Aboriginal consultation as we understand it. Of itself, the culturally inappropriate mechanism of an Upper House Inquiry also precludes Aboriginal consultation as we understand it.
2. For ACHAC, the short response time doesn't allow an analysis, provision by provision, of the *ACH Bill 2022*. Our submission therefore focuses on a positive restatement of ACHAC's policy principles for ACH reform. These have been progressively established over the past 10 years, and in particular since the NSW Government's statewide consultation on the draft *ACH Bill 2018*.
3. ACHAC's policy principles for ACH reform are drawn from our Members' extensive knowledge of first-principle Aboriginal cultural protocols, and from:
 - a. ACHAC Members' experience and understanding of the operation of the current Act
 - b. The statewide consultation of Aboriginal communities on the *ACH Bill 2018*
 - c. The *Dhawura Ngilan* Best Practice Standards¹
 - d. The NSW Closing the Gap Agreement
 - e. The considered policy advices on ACH reform that ACHAC has provided to Aboriginal Affairs, NSW Government Ministers and others since 2018.
4. ACHAC knows that any ACH reform must be capable of successful implementation, which is why our policies emphasise practicality as well as principle. On that basis, we recommend our policies as "critical success factors" for any attempt at ACH reform in NSW. We note Australia's long history of failed public policy in Aboriginal affairs and the damaging affect that has had for generations of Aboriginal people. Noting that ACH is fundamental to Aboriginal identity, ACHAC strongly recommends that the NSW Parliament should not support any approach to ACH reform

¹ **Dhawura Ngilan** is a vision statement for legislation on Indigenous cultural heritage management produced in September 2020 by the Heritage Chairs and Officials of Australia and New Zealand (HCOANZ). The vision puts forward *Best Practice Standards for Indigenous Cultural Heritage Management and Legislation*.

that has been poorly conceived, quickly and quietly, without culturally appropriate consultation with NSW Aboriginal communities.

5. ACHAC is aware that the *ACH Bill 2022* has been introduced to the NSW Parliament at the same time as the NSW Government is developing its own program of ACH reform. Although ACHAC is expressly excluded from Government consultation on their ACH reform program, we believe that the government program and the *ACH Bill 2022* both put forward unworkable policy principles for ACH governance structures. Beyond that, this submission does not draw comparisons between the two initiatives.

Aboriginal community confidence

6. Our widely shared view is that any ACH reform must be capable of effective implementation. As a practical threshold measure, in the first instance any ACH reform must be capable of attracting a high level (a critical mass) of *Aboriginal community confidence*.
7. ACHAC does not believe that the *ACH Bill 2022*, with its heavy deferral of structure and function to the NSW Aboriginal Land Council (NSWALC), is capable of generating the necessary level of Aboriginal community confidence. This critical concern is explained in **Attachment 1**.
8. While all public policy should attract good levels of community confidence, in NSW the effectiveness of the ACH administrative system is entirely reliant on high levels of active Aboriginal community collaboration. In particular, the proposed ACH New Information System – a centrepiece of ACH reform strongly supported by all stakeholders in 2018 – cannot be developed or operationalised without the confidence, active goodwill and volunteerism of Aboriginal custodians across NSW.
9. In consideration of Aboriginal community confidence, a foremost concern with the *ACH Bill 2022* (*Schedule 1*) is the proposed constitution of the ACH Council. We ask the Inquiry to recognise that, if there is little Aboriginal community confidence in the ACH Council, there also will be little community confidence in the ACH Services the Council chooses to appoint.

Governance structure - ACH Council

10. At the centre of the *ACH Bill 2018* was a new, independent statewide ACH body with executive powers, governed by appropriate Aboriginal people drawn from and representative of NSW ACH custodians. The need for such a body - with statutory decision-making powers and the resources to support a network of culturally appropriate, culturally appointed ACH Local Panels - is strongly endorsed by NSW Aboriginal communities and by ACHAC.
11. The cultural-authority requirement is strongly endorsed by the *Dhawura Ngilan Vision Statement*, most clearly in *Best Practice Statement 5*:

BPS 5: Incorporation of Principles of Self Determination

- *The key to the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) is the principle of self-determination. In the context of ICH (ACH) this principle requires that the affected Indigenous community itself should be the arbiter of the management of the ICH aspects of any proposal that will affect that heritage.*
- *Thus, in the crucial UNDRIP Article 32, reference is made to Indigenous Peoples acting through “their own representative organisations”.*

- *The identification of a legitimate “representative organisation” capable of exercising an Indigenous community’s rights and responsibilities with respect to ICH is a fundamental component in any comprehensive ICH legislation.*
 - *It is for the Indigenous community to decide who represents them, consistent with Free, Prior, Informed Consent.*
12. The *ACH Bill 2022* makes no attempt to meet the Dhawura Ngilan standard of *legitimate representative organisation*, either at the state (ACH Council) or local (ACH Service) level. Instead, the Bill proposes that the NSW Aboriginal Land Council (NSWALC) will have a controlling interest – with an unspecified Native Title party - in the appointment of the ACH Council and in the appointment of local ACH Services.
 13. It is not controversial to say that NSWALC and the Local Aboriginal Land Councils (LALCs) have no constitutional role, community mandate or accountability as a representative organisation for culturally authorised Aboriginal custodians. Within Government and within Aboriginal communities there is no serious dispute of these facts, which are explained in more detail at Attachment 1.
 14. It follows that any ACH Council that has (by law) a 50% membership of NSWALC nominees cannot be a “legitimate representative organisation” within the meaning of the Dhawura Ngilan Best Practice Standard for ACH legislation. A 50% NSWALC ACH Council would also not meet the standards put forward during the 2018 ACH consultation of an “independent statewide ACH body with executive powers, governed by appropriate Aboriginal people drawn from NSW ACH custodians”.
 15. ACHAC believes that (for information and communication purposes) NSWALC should have a seat on the ACH Council, but that it cannot have 50% representation.
 16. The Bill offers only one other pathway to representation on the ACH Council, which is by nomination from “a holder of native title rights under the Native Title Act”. This oddly worded clause at s.2(1)(b) - which could refer to an individual rather than a legal entity - is unnecessarily vague and reductive. If the Bill intends to exclude registered Native Title claimants and bodies such as the Native Title Service Corporation (NTSCorp), it should say so by clearly stating which Native Title bodies are entitled to nominate.
 17. ACHAC acknowledges that Native Title bodies may provide a direct representative status for one class of culturally authorised Aboriginal custodians. However, a large proportion of Aboriginal custodians do not have access to Native Title, and ACHAC does not support Native Title being the only pathway for Aboriginal custodians looking for representation on the ACH Council.
 18. By way of example, to ensure a majority representation of culturally authorised custodians on ACHAC, the *National Parks and Wildlife Act 1974* requires that ACHAC Members are nominated by Aboriginal Elders Groups as well as by Aboriginal Owners and Native Title Holders and registered Native Title Claimants. To ensure Aboriginal land councils (as non-custodian organisations) have minority representation, the NPW Act reserves a single ex-officio position on ACHAC for NSWALC.

Governance structure - ACH Services

19. ACHAC recommends ACH reform that legislates for self-determination and Aboriginal decision-making on ACH by culturally authorised custodians. That is, it’s not good enough to legislate for

“Aboriginal decision making” on ACH: the Aboriginal decision maker must be able to show a representative line to cultural authorisation.

20. The ACH Bill proposes to replace the (culturally authorised) ACH Local Panels of the 2018 Bill with ACH Services.
21. ACHAC notes that the Bill and its accompanying Briefing Note contradict each other on how ACH Services will be formed. The Briefing Note says the Bill has been amended to include a specific “pecking order” for what type of Aboriginal group will be prioritised for designation as an ACH Service. The Bill itself (s.23) shows no such amendment, saying only that, at the discretion of the (NSWALC aligned) ACH Council, a Local Aboriginal Land Council can be a Local Service.
22. NSWALC and LALCs are not culturally authorised ACH custodians, nor are they representative bodies for culturally authorised custodians. On the contrary, under the terms of their own Act (the *Aboriginal Land Rights Act 1983*) Aboriginal Land Councils are empowered as land marketeers and developers. ACHAC strongly supports the Aboriginal Land Council network as agents for Aboriginal land and economic development, but not as decision makers for Aboriginal cultural heritage.
23. Culturally authorised custodians – people with cultural responsibilities to their cultural heritage within NSW - will object to any ACH decision making by unauthorised people, irrespective of whether those people happen to be Aboriginal. They will also object – have no confidence in – any system of ACH protection that is administered by land marketeers and developers.
24. The *ACH Bill 2022* proposes that LALCs will have as-of-right ACH entitlements at the local ACH Service level and - if they believe they should have more local powers – they will have a self-advocacy path through their own peak body (NSWALC). With its 50% block of votes on the ACH Council – the body that decides what Local Services will be registered - NSWALC is well placed to ensure that its own LALC members have a clear run at the local ACH Service level.
25. Again, and for the the reasons given in Attachment 1, an ACH system dominated at the state and local level by Aboriginal Land Councils will not be acceptable to the great majority of culturally authorised Aboriginal custodians.

No Aboriginal consultation on *ACH Bill 2022*

26. Arguably the most serious weakness of the *ACH Bill 2022* is that its proponents have put the Bill into Parliament without making any attempt to consult in a culturally appropriate way with NSW Aboriginal communities. It may be that the proponents *ACH Bill 2022* believe their Bill will do better within the non-Aboriginal NSW Parliament than it would if it were exposed to Aboriginal community consultation, but that is no excuse for no consultation.
27. A short, fast, Upper House Inquiry is not Aboriginal consultation. The proponents of the Bill must know that legislating for Aboriginal people without consulting Aboriginal people is a breach of the *United Nations Declaration on the Rights of Indigenous People (UNDRIP 2007)* of the *National Closing the Gap Agreement (2020)*, of the *Dhawura Ngilan Vision Statement (2020)* and of every other public sector standard for Aboriginal consultation on Aboriginal policy making.
28. In 2018, the *draft ACH Bill 2018* received a high level of support from all ACH stakeholders, including industry stakeholders and NSW Aboriginal communities. Since 2018 there has been no public consultation on ACH reform. The *ACH Bill 2022*, which rejects the outcomes of the 2018 ACH consultation and looks nothing like the 2018 ACH Bill, must be put back out to consultation.

Statewide consultation on the 2018 ACH Bill – What Aboriginal communities said

29. The six-month statewide consultation on the draft 2018 ACH Bill entailed 39 workshops attended by 700 people in regional communities across the state. The consultation received over 300 submissions. Most (about two-thirds) of those who gave feedback identified as Aboriginal people.
30. Acknowledging the strengths of the 2018 consultation and acknowledging that in the last four years there has been no additional Aboriginal community consultation, ACHAC believes that it is bound to advocate the ACH reform policies that were clearly supported by Aboriginal communities in 2018.
31. Some of the policies clearly supported by Aboriginal communities in 2018 were:
 - a) ACH provisions should be removed from the National Parks and Wildlife Act
 - b) There should be standalone legislation for ACH in NSW
 - c) Statutory definitions of ACH should explicitly include elements such as landscape, water and living Aboriginal culture
 - d) There should be statutory acknowledgement that ACH is owned by Aboriginal people and not the Crown
 - e) There should be a new, independent state-wide body governed by a board of Aboriginal people as a regulatory decision-making body
 - f) Local Panels: community-led, local decision making on ACH by Aboriginal people with recognised cultural authority
 - g) Up-front assessment of ACH within the planning (development approval) system
 - h) New, regulated ACH information management systems that are managed by Aboriginal people, and that have strong safeguards and protocols
 - i) Improved compliance and enforcement including penalties that provide a true deterrent
32. It is not clear to ACHAC that the *ACH Bill 2022* meets the aspirations of policies c), e), f), h) and i).
33. ACHAC notes the Bill's intention to give the NSW Aboriginal Land Council (NSWALC) a central role in the administration of ACH and that (in an unclear way) Local Aboriginal Land Councils (LALCs) are also to have a prominent role.
34. The 2018 consultation drew a clear statement from Aboriginal communities that they did not support Aboriginal Land Councils taking a key "support" role in the administration of ACH, with 58% opposing LALC involvement and only 16% supporting.²

ACH Bill 2022 – the *Briefing Note* and Second Reading Speech

35. The Bill was distributed in advance to Members of Parliament and to the public with a companion document called a Briefing Note. While the Briefing Note is not the subject of the Inquiry, as a statement of intent and as a publicity piece it puts forward a number of statements that are inconsistent with the Bill or are misleading or are incorrect.
36. On page six, under *Frequently Asked Questions*, the publication implies that ACHAC is responsible for issuing over **1,450 Aboriginal Cultural Heritage Permits (AHIPs)** since 2010 and that **none have ever been rejected** (their bold). The Briefing Note goes on to say, also in bold, that ACHAC is "irrevocably broken and mistrusted by Aboriginal Australians".

² *Summary of submissions – Consultation on ACH Bill 2018* (Office of Environment and Heritage 2018)

37. Putting aside the inflamed rhetoric and incorrect data, the claim concerning ACHAC's role in the issuing of AHIPs is false. The authors of the paper – ostensible experts in ACH administration - would know that ACHAC has no role whatsoever in assessing, approving, rejecting or issuing AHIPs.
38. Unfortunately, in his second reading speech, the Rev Fred Nile repeated these incorrect claims in the NSW Parliament, saying:
- The Aboriginal Cultural (Heritage) Advisory Committee and its decisions are not independent from the Minister. Since 2010 there have been over 1,450 Aboriginal heritage impact permits granted by the Aboriginal Cultural Advisory Committee. Not a single application has ever been declined. Either this means that we have a flawless approval system or there is something seriously wrong with the process.
39. Under its terms of appointment, ACHAC has little opportunity to publicly defend its reputation even from very damaging misrepresentations. ACHAC is taking this opportunity to state that, in his Briefing Note and in his second reading speech of the *ACH Bill 2022*, the Hon. Rev Nile has profoundly misrepresented the current legislation in relation to AHIPs, and has done so under the privilege of Parliament in an unfair way that is reputationally damaging to ACHAC.
40. ACHAC submits that's important to have a competent knowledge of how the current legislation operates before asserting how new legislation might be made to improve the protection of ACH.

ACHAC Recommends:

In addition to several in-text recommendations, ACHAC recommends:

- 1) That the Upper House Inquiry and the NSW Parliament do not support the *ACH (Culture is Identity) Bill 2022*.
- 2) That the NSW Parliament redirect its efforts to ensuring that the Government's ten-year NSW ACH reform program is finalised in full accordance with:
 - a. the outcomes of the 2018 ACH statewide consultation
 - b. the *United Nations Declaration on the Rights of Indigenous People (UNDRIP 2007)*
 - c. the *NSW Closing the Gap Agreement (2020)*
 - d. the *Dhawura Ngilan Vision Statement (2020)*; and
 - e. ordinary public sector standards for Aboriginal consultation on Aboriginal policy making
- 3) That instead of progressing the *ACH Bill (culture is Identity) 2022*, the NSW Parliament supports the Government revitalising its ten-year ACH reform program by:
 - a. putting aside its "too complex, too expensive" rejection of the *draft ACH Bill 2018*
 - b. putting aside its rejection of ACHAC as an Aboriginal party for consultation on ACH reform.

Glenda Chalker

Chair, Aboriginal Cultural Heritage Advisory Committee

13 September 2022

ATTACHMENT 1

To ACHAC submission - Upper House Inquiry - ACH Bill 2022

NSWALC as overseeing or organisation for the ACH reforms

At the Minister's ACH reforms meeting (7 May 2021) NSWALC asked the ACHAC Chair to explain why ACHAC does not support NSWALC being the Aboriginal statewide body for the ACH reforms. The ACHAC Chair agreed to take the question on notice, pending the usual ACHAC process of committee consultation and authorisation of policy advice. That process is now completed.

ACHAC affirms that NSWALC has an important role to play in the implementation of the Aboriginal Land Rights Act (1983) and ACHAC strongly supports NSWALC continuance as the statewide body for Aboriginal advancement through land acquisition and economic development. Where practical and appropriate, ACHAC also supports the participation of Local Aboriginal Land Councils (LALCs) in the proposed ACH Local Panels and as potential regional support bodies for ACH Local Panels.

At the same time, ACHAC notes the core recommendation of the 2017 statutory review of the NSW Aboriginal Land Rights Act; that there is critical need for increased government resourcing (funding and support) to enable Aboriginal land councils to meet their obligations under the Act. In 2021, as the ALR Act approaches its next statutory review, ACHAC is not aware of any NSW Government action or policy response to the 2017 review.

While noting a role for LALCs in the ACH reforms, this policy statement is about the role of the NSW Aboriginal Land Council (NSWALC). There are three main reasons for ACHAC not supporting NSWALC as an Aboriginal statewide body for Aboriginal cultural heritage.

1. NSW Aboriginal land councils have no representative status for Aboriginal cultural authority

ACHAC policy is that NSW requires an ACH representative body at the state level. ACHAC's policy is consistent with the clear outcomes of community consultations on the 2018 ACH Bill and is supported by HCOANZ³ Best Practice Principles from the Dhawura Ngilan vision document:

HCOANZ Best Practice Standard 5: Incorporation of Principles of Self Determination

- The key to the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) is the principle of self-determination. In the context of ICH, this principle requires that the affected Indigenous community itself should be the arbiter of the management of the ICH aspects of any proposal that will affect that heritage.
- Thus, in the crucial UNDRIP Article 32, reference is made to Indigenous Peoples acting through "their own representative organisations".
- The identification of a legitimate "representative organisation" capable of exercising an Indigenous community's rights and responsibilities with respect to ICH is a fundamental component in any comprehensive ICH legislation.
- It is for the (affected) Indigenous community to decide who represents them, consistent with Free, Prior, Informed Consent.

³ Heritage Chairs and Officers of Australia and New Zealand (2020)

Cultural knowledge and cultural authority (speaking for country) are highly specialist entitlements that are intrinsic to Aboriginal custodianship of ACH. Historical and contemporary Aboriginal cultural practice is that cultural authority is exceptional and stand-alone: it is a primary custodial and

representative authority that cannot be made over to third parties, nor can it be bundled up in a wider set of “Aboriginal issues”.

It follows that the custodians of ACH will expect any statewide organisation representing ACH interests to have clear representative lines to cultural authority. As a statewide body, NSWALC does not have clear representative lines to cultural authority.

The NSWALC Board is drawn from and elected by members of Local Aboriginal Land Councils (LALCs). While many land council members are also acknowledged ACH custodians, LALC members (and those they elect) are not required to have cultural heritage connection within their constituent LALC area.

The only requirement for an adult Aboriginal person to become a voting or elected member of a land council are that they 1) reside within the LALC area; or 2) have an association with the area; and 3) have been accepted by a LALC meeting as being qualified to be a member. It can be argued that this arrangement is “good enough” for the purposes of Aboriginal advancement through the NSW Aboriginal Land Rights Act. It cannot be argued that the NSW land council system is a “good enough” representative structure for NSW Aboriginal custodians of ACH.

2. The NSW land council network has a conflict of interest with ACH regulation

ACHAC supports the land acquisition and commercial development role of the NSW Aboriginal land council network, noting that many land councils are significant landholders and active developers.

Explaining the value of Aboriginal land council planning and development, *Collaborate NSW*⁴ say:

LALCs are often the largest landholders within a local government area... LALC developments, subdivisions and/or re-zonings can have important implications in future planning and land use in the local government area.

The planning and development of land is a source of potential income for LALCs, making residential and commercial development key aspirations of these bodies.

ACHAC believes that any organisation with a key role as a commercial property developer cannot also have a prominent role in the regulation (protection) of Aboriginal cultural heritage without creating an obvious conflict of interest.

3. Insufficient confidence among Aboriginal communities in the NSW land council network

It is widely accepted that the ACH reforms will only be successful if they have the confidence of most NSW Aboriginal people and communities. In particular, for the proposed ACH New Information System and ACH Local Panels to be effective, the new ACH representative regime must be capable of gaining the confidence of Aboriginal custodians of ACH.

Many Aboriginal people are supportive of their LALC, noting that LALCs have always been under-resourced to perform the many complex tasks that are expected of them. ACHAC also affirms that

⁴ <http://collaboratensw.org/council-services/aboriginal-land-council/> (May 2021)

multiple land councils perform to an excellent standard under very difficult conditions, and calls for adequate resourcing (funding, training and support) for the many LALCs that do not.

However, it should be noted that across the state only 20% of eligible NSW Aboriginal people are registered members of Aboriginal land councils ⁵ and that, while being on the rolls, many of these do not vote or participate in the activities of their LALC.

NSWALC Elections - 2019 Results Table⁶

Number of (LALC) eligible voters in each NSWALC region	Total votes cast	Winning vote	Winning percentage of votes cast	% of LALC registered voters	% of NSW adult Aboriginal people
Central 1,456	465	201	43%	13%	2.6%
Mid North Coast 1,779	547	247	45%	14%	2.8%
North Coast 1,690	625	190	30%	11%	2.2%
North Western 2,172	700	326	46%	15%	3%
South Coast 1,700	286	144	50%	8%	1.6%
Sydney/Newcastle 3,515	718	236	33%	7%	1.4%
Western 900	317	127	40%	14%	2.8%
Wiradjuri 2,214	415	218	53%	10%	2%

In 2022, NSWALC’s average electoral mandate (right-hand column) is 2.3% of NSW adult Aboriginal people. ⁷

Consistent with the low take up of LALC membership, many Aboriginal people have strongly held misgivings about the functional capability, transparency and governance standards of land councils in the exercise of their current responsibilities and would oppose any additional responsibilities - in particular that of Aboriginal cultural heritage - being conferred by the NSW Government on the land council network.

These issues are longstanding, with 50% of respondents to the NSW Ministerial Taskforce on Aboriginal Affairs survey (2012) registering concern over the functionality and representativeness of “established Aboriginal community organisations”. ⁸

Since 2018, ACHAC policy has been strongly reflective of the views of Aboriginal people and communities expressed in the statewide consultation on the 2018 ACH Bill. That consultation

⁵ “At present barely twenty percent of eligible adult Aboriginal people are registered as members of LALCs, which also make up the electoral roll for NSWALC elections”. *Aboriginal Land Rights Act Statutory Review*, NSW Government (2017).

⁶ Voting figures taken from the **2019 NSWALC election report** - [NSW Electoral Commission](#)

⁷ Note that this table is an addition to the substantive ACHAC advice, provided at the request of NSWALC, in June 2021.

⁸ *Getting it Right* – NSW Ministerial Taskforce on Aboriginal Affairs (2012)

proposed an ACH Authority as an independent statewide body and so did not ask a question about land councils overseeing the ACH system. However, the consultation did ask a question about land councils providing coordination and support to ACH Local Panels. ACHAC notes that of the submissions that commented on who should provide this low-level of ACH support, only 33% supported Aboriginal land councils undertaking the role, with 23% expressly against. At the same time 58% of respondents supported an Aboriginal organisation *other* than an Aboriginal land council to undertake the role, with only 16% opposing that view.⁹

These concerns are highly sensitive, contentious and difficult to raise within Aboriginal communities. However, the consistent evidence from government-led research is that Aboriginal land councils do not have the support of NSW Aboriginal communities to undertake a lead role in the administration of Aboriginal cultural heritage.

ACHAC would like to emphasise that none of the above policy statement is intended to reflect on any individual land council, and that ACHAC supports and calls for more resources for the NSW Aboriginal land rights network.

22 June 2021

Updated 17 June 2022

⁹ 2018 ACH Bill – Summary of Submissions (OEH 2018)