



HIGH COURT OF AUSTRALIA

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Details of Filing

File Number: P23/2026
File Title: Yanunijarra Aboriginal Corporation RNTBC & Ors v. State of
Registry: Perth
Document filed: Form 27D - Respondent's submissions
Filing party: Respondent
Date filed: 27 Aug 2026

Important Information

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Form 27D—Respondent’s submissions

Note: See rule 44.03.3.

IN THE HIGH COURT OF AUSTRALIA

PERTH REGISTRY

ON APPEAL FROM THE FULL COURT OF THE FEDERAL COURT OF
AUSTRALIA

10 BETWEEN: **Yanunijarra Aboriginal Corporation RNTBC**
First Appellant
Walalakoo Aboriginal Corporation RNTBC
Second Appellant
Malarngowem Aboriginal Corporation RNTBC
Third Appellant
Kimberley Land Council Aboriginal Corporation
Fourth Appellant

and

20 **State of Western Australia**
Respondent

RESPONDENT’S SUBMISSIONS

Part I: Certification

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1. These submissions are in a form suitable for publication on the internet.

Part II: Issues

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- 30 2. The issue is whether, on the proper construction of ss 28, 29(7), 31, 32 and 237 of the *Native Title Act 1993* (Cth) (NTA), the Government party’s anterior consideration of s 237 is a statutory decision or condition of legal efficacy of a s 29(7) statement, with the consequence that an error in that anterior consideration both attracts judicial review and requires the notice to be treated

as if the statement had not been included. The Respondent submits that neither proposition follows from the NTA.

Part III: Section 78B notice

3. No issue arises requiring notice under s 78B of the *Judiciary Act 1903* (Cth).

Part IV: Facts

4. The Respondent does not dispute the facts set out in AS [5]-[17] but says further.
- 10 5. The issue before the Full Court was whether the primary judge erred in summarily dismissing the originating application pursuant to s 31A of the *Federal Court of Australia Act 1976* (Cth). Both before the primary judge and the Full Court, the determinative issue was one of law. The evidence was not complete and was untested. The evidence concerning the asserted 2022 Policy and the circumstances in which the statements were included was incomplete and untested, and no findings of fact were made about that policy or the asserted burdens of the expedited procedure: PJ [32], [68]; FC [3]-[6].
- 20 6. The originating application originally challenged three **alleged decisions** made by the Government party (being the responsible Minister for the *Mining Act 1978* (WA)) to include s 29(7) statements in notices given under s 29 of the NTA in respect of proposed exploration licences under the *Mining Act*: PJ [20]-[25]; FC [14].
7. The Appellants contended that, before including such a statement, the Government party was required to consider and apply the definition of “act attracting the expedited procedure” in s 237 by giving active consideration to each criterion in s 237(a)-(c), reasonably, on a correct understanding of the law and on the basis of some available material; they alleged that the State failed to perform that task and sought review of the alleged decisions: PJ [23]-[25]; FC [3].
- 30 8. Relying upon the *Administrative Decisions (Judicial Review) Act 1977* (Cth) (**ADJR Act**), s 39B of the *Judiciary Act 1903* (Cth) and ss 21 and 23 of the

Federal Court of Australia Act, the Appellants sought certiorari in respect of the alleged decisions and declaratory relief that:

- 8.1. the s 29(7) statements included on each notice had no legal effect; and
- 8.2. the procedure under s 31(1) of the *Native Title Act* applied to each of the acts identified in the relevant notices.

- 9. The Appellants also sought leave to amend to add a fourth alleged decision, concerning the second YAC notice (**AS [6]**). The primary judge did not need to determine that application after giving summary judgment, although his Honour indicated that leave otherwise would have been granted: **PJ [176]-[182]**. By the time of the Full Court appeal, the underlying tenement applications concerning the other three notices had been withdrawn; the second YAC notice alone remained relevant to a live proposed future act: **FC [15]-[17]**.
- 10. In relation to the second YAC notice, any objection under s 32(3) was required to be lodged within four months after the notification day. YAC did not lodge an objection within that period: **FC [17]**. On the Respondent's construction, and assuming the notice otherwise complied with Subdiv P, ss 32(2) and 28(1)(c) are therefore engaged. Whether the Appellants' alleged anterior defect prevents that result is a question of statutory construction, not an assumed premise.

20 **Part V: Argument**

Reviewable decisions under the ADJR Act

- 11. For the purposes of the ADJR Act, *Bond* establishes that a reviewable "decision" will generally be an ultimate, operative or substantive determination, while recognising that an intermediate determination may itself be reviewable where the statute provides for a substantive finding or ruling as an essential preliminary to the ultimate exercise of power: *Australian Broadcasting Tribunal v Bond* (1990) 170 CLR 321 at 335-340 (Mason CJ), 377 (Toohey and Gaudron JJ); *Fuller v Lawrence* (2024) 282 CLR 646 at [16].
- 12. That construction reflects the balance identified in *Bond* between effective judicial review and avoiding fragmentation of administrative processes by review of every step or conclusion reached along the way: *Bond* at 335-338.

13. *Griffith University v Tang* (2005) 221 CLR 99 does not displace that analysis. *Tang* requires, first, that the alleged decision be expressly or impliedly required or authorised by the enactment and, secondly, that the decision itself derive legal force or effect from the enactment by conferring, altering or otherwise affecting legal rights or obligations. *Fuller v Lawrence* confirms that those criteria cohere with *Bond*'s essential-preliminary exception; both inquiries therefore return to the anterior question of what the statute has made legally operative: *Tang* at [89]; *Fuller* at [13]-[16], [20]-[22].

Judicial review, certiorari and declaratory relief

- 10 14. Certiorari removes the legal consequences, or purported legal consequences, of an exercise or purported exercise of power. Where an intermediate step is challenged, the question is whether the statute gives that step a discernible legal effect on the ultimate exercise of power, rather than whether it is merely causally or factually connected with what follows: *Hot Holdings Pty Ltd v Creasy* (1996) 185 CLR 149 at 159-160, 165, 170; *Probuild Constructions (Aust) Pty Ltd v Shade Systems Pty Ltd* (2018) 264 CLR 1 at [28].
15. The Respondent's case does not depend on any proposition that executive conduct associated with s 29(7) is categorically immune from judicial review. It is not: *Warrie (on behalf of the Yindjibarndi People) v Western Australia* (2017) 365 ALR 624, [212]-[216]). The narrower question is whether the NTA makes the Government party's anterior consideration of s 237 a substantive statutory determination or a condition of the legal efficacy of the statement. On the proper construction of Subdiv P, it does not: **PJ [145], [153]-[158]; FC [61]-[75]**.
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The Native Title Act

16. The main objects of the NTA are both to provide for the recognition and protection of native title and to establish ways in which future dealings affecting native title may proceed and to set standards for those dealings. Neither object is free-standing; each is achieved through the provisions Parliament enacted: NTA, s 3; *BHP Billiton Nickel West Pty Ltd v KN (Deceased)* (2018) 258 FCR 521 at [22].

17. Part 2 Div 3 supplies the statutory code governing, for the purposes of the NTA, whether a future act validly affects native title and the consequences of the act for native title. That is a code as to whether and to what extent a future act validly affects native title: NTA, ss 10, 11, 24AA and 24OA; *BHP Billiton* at [22], [28]-[35]. The Respondent does not contend that Div 3 otherwise excludes judicial review of executive conduct where some independently reviewable exercise of statutory power is identified.
18. The scheme is directed both to the protection of native title and to providing certainty as to whether future acts are valid insofar as they are inconsistent with native title rights and interests. The Respondent submits that its “rule-like quality” lies not in the absence of evaluative judgments, but in Parliament’s identification of the particular procedures, decisions and states of satisfaction to which the statutory consequences of Div 3 attach: *Yanunijarra Aboriginal Corporation RNTBC v Western Australia* (2020) 276 FCR 53 at [89]-[90].
19. A future act is valid, to the extent that it affects native title, if it is covered by an applicable provision of Div 3 and otherwise falls to s 24OA if it is not. The hierarchy and the consequence of non-compliance therefore depend on the particular provisions Parliament has made conditions of validity: NTA, ss 24AA(2), 24AB and 24OA; *BHP Billiton* at [28]-[35].
20. That distinction matters. *BHP Billiton* demonstrates that not every procedural obligation in Div 3 is automatically a condition of validity. Subdiv P is expressly a subdivision whose applicable requirements matter to validity, but it remains necessary to identify the particular statutory requirement said to have been breached and the consequence Parliament has attached to that breach: *BHP Billiton* at [20]-[37], especially [34]-[37].
21. The present Subdiv P was introduced by the 1998 amendments, substantially re-enacting and amending the former right-to-negotiate provisions (which had appeared in former Subdiv B of Div 3). The stated purpose of the amendments was “to streamline the right to negotiate processes so that unnecessary delays are eliminated while maintaining the protection of the legitimate interests of native title holders and claimants”: Native Title Amendment Bill 1997 (Cth), Explanatory Memorandum at [18.11]; see also **PJ [151]**.

22. The NTA also demonstrates that Parliament knew how to make a governmental assessment a tightly prescribed condition for excluding or modifying the ordinary right-to-negotiate regime. Sections 26A-26C prescribe, in varying terms, notice, submission and substantive satisfaction requirements before specified classes of acts may be excluded: NTA, ss 26(2), 26A, 26B and 26C.
23. For acts to which Subdiv P applies, ss 24AA(5), 25(4) and 28 make compliance with the applicable procedures of Subdiv P and satisfaction of one of the pathways in s 28 conditions of validity for the purposes of the NTA: NTA, ss 24AA(5), 25(4) and 28; *BHP Billiton* at [23].
- 10 24. The first procedural requirement is the Government party's obligation to give notice of the proposed act in accordance with s 29. The notice must be given to the relevant native title parties and, where applicable, a representative Aboriginal/Torres Strait Islander body, to the grantee party, and to the registrar or other proper officer of the arbitral body; public notification is also required in the circumstances specified by s 29: NTA, ss 29(1)-(4), 30.
25. Subsections 29(4)-(6) prescribe mandatory content and timing requirements for the notice, supplemented where applicable by the *Native Title (Notices) Determination 2011 (No 1)*: NTA, ss 29(4)-(6); *Native Title (Notices) Determination 2011 (No 1)*, cl 6.¹
- 20 26. Section 29(7) is materially different. It provides that the notices “may include a statement that the Government party considers the act is an act attracting the expedited procedure”. Apart from the restriction concerning project acts, the NTA prescribes no further process, reasons requirement, evidentiary threshold or express condition of legal efficacy for inclusion. That is not to say that the Government party may truthfully make the statement if it does not in fact hold the view expressed, or that s 237 is irrelevant to the subject matter of that view: **PJ [153]**; NTA, ss 29(7), (9)-(10); **PJ [153]**; *Western Australia v Ward* (1996) 70 FCR 265 at 271 (Lee J).

¹ The 2011 Determination was repealed and replaced with *Native Title (Notices) Determination 2024* on 1 October 2024: *Native Title (Notices) Determination 2024*, cl 2. Clause 6 of the 2011 Determination is now cl 7 in the 2024 Determination.

27. After notification, Subdiv P provides two principal procedural tracks: the normal negotiation procedure in s 31 and the expedited procedure in s 32.
28. Inclusion of the s 29(7) statement changes the applicable procedural track immediately: s 32 applies instead of s 31. But the statement does not itself determine the substantive s 237 question or finally determine whether and how the future act may validly be done: FC [61]-[62].
29. Section 32(3) permits a native title party to object “against the inclusion of the statement” within four months. The objection need not allege administrative-law error in the Government party’s reasoning. If an objection is lodged, s 32(4) requires the arbitral body to determine whether the act is an act attracting the expedited procedure; the inquiry is into s 237, not into the legality or adequacy of the Government party’s anterior reasoning.²
30. If no objection is lodged in accordance with s 32(3), s 32(2) permits the Government party to do the act and s 28(1)(c) supplies the corresponding pathway to validity, subject to satisfaction of the other applicable requirements.
31. If an objection is lodged, the NNTT must hold the statutory inquiry, afford the parties the procedural rights conferred by the NTA, make its **determination** and state the findings of fact on which it is based; a party has a right of appeal to the Federal Court on a question of law. The statutory merits decision is therefore the Tribunal’s s 32(4) determination, not a review of the Government party’s reasons: NTA, ss 75, 139, 141, 142, 162 and 169; *Cheinmora* (1996) 142 ALR 21 at 41-42.
32. Where the Tribunal determines that the expedited procedure does not apply to the proposed act, then “subsection 31(1) applies *as if the notice did not include* [the s 29(7) statement]”: NTA s 32(5).
33. Before a s 32(4) determination, the Government party may withdraw its statement by written notice under s 32(7), in which event s 31(1) applies “as if

² NTA, ss 32(3)-(5); *Cheinmora v Striker Resources NL; Dann v State of Western Australia* (1996) 142 ALR 21, 41 (although an appeal from that decision was allowed in *Dann v Western Australia and GPA Distributors* (1997) 74 FCR 391, no challenge was made to this issue; further, whilst s 29 (and Part 2, Division 3) has been amended since *Cheinmora* was decided, no relevant distinction arises in the operative terms of the provisions in issue.

the notice did not include such a statement”. The NTA prescribes no substantive criterion for that withdrawal.

34. Similarly, a native title party may withdraw an objection before determination; if all objections are withdrawn, ss 32(6) and 28(1)(e) permit the act to be done, subject to the other applicable requirements.
35. The same structure is reflected in s 31(1), which applies “[u]nless the notice includes” the specified statement, and in s 32(1), which applies “if the notice given under section 29 includes” that statement. The statutory language focuses on what the notice includes: NTA, ss 31(1), 32(1), (5) and (7).
- 10 36. Subsection 28(1) reinforces that architecture. Its pathways are: no native title party within the specified periods (paras (a) and (b)); no objection under s 32(2) (para (c)); a Tribunal determination under s 32(4) that the act attracts the expedited procedure (para (d)); withdrawal of all objections under s 32(6) (para (e)); an agreement under s 31(1)(b) (para (f)); a determination under s 36A or s 38 that the act may be done (para (g)); or ministerial overruling under s 42 (para (h)).

The alleged decisions are not reviewable decisions

37. That architecture exposes two distinct propositions the Appellants must establish. First, the Government party’s anterior process of considering s 237 must be a statutory condition of the legal efficacy of the statement. Secondly, breach of that condition must have the consequence that ss 31 and 32 disregard the statement and treat the notice as if it did not contain it. The general authorities about review of statutory opinions establish neither proposition.
- 20 38. The Appellants tend to collapse three different functions. A s 29(7) statement represents a present governmental view; the Tribunal determines the substantive s 237 question if a timely objection is maintained; and s 28 identifies the statutory pathways by which the future act may validly affect native title. A representation of a view is not, without more, the statutory adjudication of the merits or the source of the later legal consequences: *Holt v Manzie* (2001) 114 FCR 282 at [23]-[25] (Olney J); PJ [145], [156]-[158]; FC [63]-[71].
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39. The Respondent accepts that the words “the Government party considers” describe the view represented by the statement. If the Government party did not hold that view, different questions might arise. But the pleaded case goes much further: it asserts an active, criterion-by-criterion decision-making process governed by familiar judicial-review standards and says any error makes the statement legally ineffective. Section 29(7) does not express those incidents, and the primary judge was careful not to suggest otherwise: PJ [153]; cf *R v Connell; Ex parte Hetton Bellbird Collieries Ltd* (1944) 69 CLR 407 as to review of a statutory opinion once the existence of the opinion is made a condition of power.
40. The syntax is significant. Section 29(7) does not provide, for example, that “if” or “where” the Government party considers that s 237 is satisfied it may invoke a statutory power with identified legal consequences. Its subject is “the notices”, which may include a statement reporting the Government party’s view. *Holt* rejected materially the same attempt to convert that wording into a separate conditional statutory determination: *Holt* at [22]-[25]; PJ [135]-[140].
41. The surrounding provisions sharpen the contrast. Section 29(6) expressly makes the notification day depend on what, “in the Government party’s opinion”, it is reasonable to assume; ss 26A-26C contain detailed satisfaction and procedural requirements; and s 32(4) expressly commands the arbitral body to “determine whether” the act attracts the expedited procedure. Parliament knew how to make an evaluative state of mind or determination a statutory condition. The authorities relied on by the Appellants concerning words such as “considers”, “opinion” and “satisfied” show that such language can perform that function where the statutory syntax and context make it do so; they do not answer whether s 29(7) does so here.
42. On the proper construction, the operative triggers in ss 31(1) and 32(1) are the presence or absence of the specified statement in the notice. That construction follows from the repeated statutory references to what the notice “includes”, the independent Tribunal determination in s 32(4), and the express provisions stating when s 31 applies as if an existing statement had not been included: PJ [145], [156]-[158]; FC [63]-[71], [74].

43. *Cheinmora* at 41 supports that structural conclusion. Carr J rejected the contention that the Tribunal's jurisdiction depended on the Government party first having directed its mind to the s 237 criteria. The Tribunal's jurisdiction was enlivened by the statement and a valid objection, and the duplication that would follow from requiring an anterior governmental determination of the same statutory merits question reinforced that construction.
44. The same construction best serves the purposes Parliament actually enacted. The NTA protects native title while also providing certainty for future dealings, and the 1998 amendments were expressly directed to streamlining the right-to-negotiate process. The Appellants' construction would leave the application of ss 31 and 32 open to later collateral challenge by reference to an unexpressed anterior decision-making standard, including after the objection period has expired and parties have acted on the statutory pathway. Discretion to withhold relief in a later proceeding does not provide the ex ante certainty the statutory scheme seeks to create: NTA Preamble; *Yanunijarra* at [5]; Native Title Amendment Bill 1997 (Cth), Explanatory Memorandum at [18.11], [20.13], [20.34]; FC [68]-[69].
45. There is a further and independent difficulty with the Appellants' case. As *Attorney-General (Tas) v Casimaty* (2024) 283 CLR 1 at [32]-[34] emphasises, identifying the content of a statutory condition and identifying the legal consequence of non-compliance are separate questions of statutory construction. Even if the Appellants could establish some enforceable legal constraint on the manner in which the Government party forms the view expressed in a s 29(7) statement, it would not follow without further construction that breach renders the statement non-existent for the purposes of ss 31 and 32.
46. The text points the other way. Sections 32(5) and 32(7) expressly identify two circumstances in which, despite a statement having been included, s 31(1) applies "as if" it had not been included: an adverse Tribunal determination and withdrawal by the Government party. Those express counterfactual provisions are a powerful indication against implying a further route by which a court is to treat an existing statement as absent because of error in an anterior process.

47. *Minister for Immigration, Citizenship, Migrant Services and Multicultural Affairs v Moorcroft* (2021) 273 CLR 21 provides a close constructional analogy. A thing done in the purported but invalid exercise of power remains a thing in fact and may be a fact to which another valid law attaches consequences; whether validity of the first act is necessary to the second actor's task depends on the construction of the second law. Here, ss 31 and 32 are the provisions attaching consequences to the content of the notice. It therefore begs the constructional question to reason from an alleged defect in an anterior governmental act directly to the conclusion that the statement must be ignored.
- 10 48. *Fuller* does not assist the Appellants on that missing step. There, the statutory scheme itself made the legal efficacy of the corrective-services direction material to the legal obligation that followed, and the direction was expressly within the statutory structure considered by the Court: *Fuller* at [16], [20]-[22]. Here, whether a valid anterior s 237 determination is a condition of the statement's operation is the very premise the Appellants must establish. Nor does *Forrest & Forrest Pty Ltd v Wilson* (2017) 262 CLR 510 answer the anterior question whether s 29(7), properly construed, imposes the particular condition for which the Appellants contend; that case concerned requirements which the text and sequential structure of the statutory regime identified as
- 20 essential preliminaries to the exercise of the relevant powers: *Forrest & Forrest* at [62]-[65], [84]-[89]; see also *BHP Billiton* at [44]. The existence of such a condition in the present case must first be found in the text, context and structure of Subdiv P.
49. Nor do the rule of law or the protective character of the NTA supply the missing condition. The Respondent accepts the foundational proposition that executive government must ascertain and comply with the law that limits its power: *Abdel-Hady v Commonwealth* (2026) 100 ALJR 742 at [1]. The question is what the NTA requires. As *BHP Billiton* explains at [22], the objects of the NTA are not freestanding; the statutory balance, including the protection
- 30 afforded by a Tribunal merits determination after a timely objection, must be taken from the enacted provisions rather than from an a priori preference for one procedural pathway.

50. The contrast on which the Appellants rely between “considers”, “opinion” and “satisfied” therefore does not advance their case. Those expressions take their legal significance from the provision in which they appear. Section 29(7) reports a governmental view in a notice; s 32(4) allocates the definitive s 237 merits determination, when disputed, to the arbitral body. Treating the expressions as interchangeable irrespective of syntax would erase that allocation.
51. The objection mechanism is relevant statutory context, but the Respondent does not put it as a substitute form of judicial review. It is a merits process in which the Tribunal decides s 237 for itself. Its significance is that Parliament expressly supplied a prompt mechanism for a native title party to contest use of the expedited track and assigned the substantive s 237 determination to the Tribunal, while also prescribing what follows if no objection is lodged.
52. It follows that the alleged anterior decision does not satisfy *Tang*. The NTA does not require or authorise a separate substantive decision applying s 237 as the source of the statement’s legal operation; and the legal consequences in ss 31 and 32 are attached by the statute to the notice containing the statement, not to an anterior decision as such. Alternatively, the alleged decision is not the substantive or essential preliminary determination contemplated by *Bond* and *Fuller* because the statutory merits question is left to s 32(4).
53. The same construction disposes of the pleaded claims for relief under s 39B and ss 21 and 23 of the *Federal Court of Australia Act*. The Full Court did not need to decide, and expressly did not decide, whether conduct associated with inclusion of such a statement could ever be amenable to general-law review: **FC [75]**. The present claims depend on the specific proposition that the NTA imposes the pleaded active-consideration requirements and that breach deprives the statement of legal effect. Once that proposition is rejected, certiorari cannot remove a legal consequence that the statute does not attach to the alleged anterior decision, and declaratory relief cannot make s 31 apply contrary to the proper construction of the NTA: *Probuild* at [28]; *Wingfoot Australia Partners Pty Ltd v Kocak* (2013) 252 CLR 480 at [25]; **FC [74]-[75]**. Questions of fraud, bad faith or other differently pleaded grounds do not arise.

54. Finally, **FC [75]** does not convert the pleaded case into a triable issue. *Spencer v Commonwealth* (2010) 241 CLR 118 at [21]-[25], [52], [60] requires caution in summary disposition, but recognises that a proceeding may be summarily determined where, even assuming the pleaded facts, the asserted legal entitlement does not exist. The primary judge had full argument on the constructional issue and correctly held that its resolution did not depend on the untested evidence: **PJ [69]-[82]**. The Full Court then determined the same issue on appeal. The mere possibility of some different, hypothetical general-law challenge therefore provided no reason to remit these pleaded claims for trial.

10 The appeal should therefore be dismissed.

Part VII: Estimate of oral argument

55. The Respondent estimates 2 hours will be required for oral submissions.

Dated 27 August 2026



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ANNEXURE TO RESPONDENT'S SUBMISSIONS

No	Description	Version	Provision(s)	Reason for providing this version	Applicable date or dates
1.	<i>Administrative Decisions (Judicial Review) Act 1977 (Cth)</i>	1 July 2026 (Compilation 132)		Currently in force; relevant provisions unchanged.	
2.	<i>Native Title Act 1993 (Cth)</i>	12 June 2024 (Compilation 50)	Preamble, ss 3, 10, 11, Part 2 Div 3, ss 75, 139, 141, 142, 162, 169, 237	Currently in force; relevant provisions unchanged.	
3.	<i>Native Title Act 1993 (Cth)</i>	1 January 1998 – 29 September 1998 (Compilation 10)	Div 3, Subdivision B	For illustrative purposes only.	
4.	<i>Native Title (Notices) Determination 2011 (No 1) (Cth)</i>	2 March 2011 – 30 September 2024	Cl 6	Not currently in force. In force on the date the section 29 notice for E 80/5931 was issued.	22 September 2023
5.	<i>Native Title (Notices) Determination 2024 (Cth)</i>	17 September 2024	Cl 7	Currently in force.	