Introduction

On 31 June 2017, the then Minister for Aboriginal Affairs, the Hon Will Hodgman MP, announced a review of the Aboriginal and Dual Naming Policy. The objectives of the Review are to provide recommendations to the Minister for Aboriginal Affairs and the Minister for Primary Industries and Water on any changes or improvements to the Policy to enhance inclusivity, procedural efficiency and broader promotion of the Policy. The following areas are being considered under the review:

– parties who can nominate Aboriginal and dual name proposals;
– requirements for authenticating Aboriginal and dual names;
– the role of local Aboriginal groups and dual naming;
– palawa kani and the use of other Tasmanian Aboriginal languages under the Policy;
– the requirements for consultation under the Policy; and
– replacing place names (including offensive names) with Aboriginal names.

On 30 November 2017, the then Minister for Aboriginal Affairs released an Issues Paper as the basis for public and stakeholder consultation on the Review. The Issues Paper provided background information on the Policy and identified issues associated with the Policy with accompanying questions.

The Issues Paper contained 12 questions identifying matters for consideration by the review. Tasmanian Aboriginals, Aboriginal community organisations and groups, Local government, interested parties, and members of the public were all invited and encouraged to participate and have their say on the Issues Paper. Written submissions were received and face-to-face meetings were held with interested groups. Public consultation closed on 22 December 2017 with 15 submissions being received (refer to Appendix 1).

This Consultation & Stakeholder Feedback Report summarises the responses to the questions outlined within the Issues Paper as well as key points raised during consultation. This Report should be read in conjunction with the Issues Paper.

Thank you to all individuals and organisations who read the Issues Paper and participated in the process by making a submission. The public submissions are available on the Department of Premier and Cabinet’s website www.dpac.tas.gov.au in accordance with the Department of Premier and Cabinet’s Publication of submissions received by Tasmanian Government departments in response to consultation on major policy matters.
DISCLOSURE ABOUT INFORMATION CONTAINED IN THIS PAPER

This Report summarises the comments, suggestions and ideas outlined in the public submissions received. Some of the suggestions and responses contained in this Report were made and / or supported by multiple submissions, others were made in a single submission. The Report does not seek to support any particular idea or proposal, nor does it aim to show any preference for specific ideas. It aims to present propositions contained in the Issues Paper on the basis of comments received through the consultation process.

Next Steps:

It is proposed that a further round of stakeholder consultations occur to discuss the drafting of any proposed amendments or enhancements to the Policy.

These amendments would then form recommendations to be put forward to the Ministers.
Executive Summary

During a seven-week consultation period 15 public submissions were received in response to the Review of the Aboriginal and Dual Naming Policy Issues Paper. The responses received were from interested members of the public (four); Aboriginal community organisations (six); and individual councils (five). Comments were received from eight Tasmanian Government agencies.

In addition, three Aboriginal organisations requested a face-to-face meeting with representatives from the Department of Premier and Cabinet and the Department of Primary Industries, Parks, Water and Environment to discuss the review.

Of the six Aboriginal community organisation submissions, four were broadly supporting, or reinforcing comments made in one submission by the Tasmanian Regional Aboriginal Communities Alliance.

The Tasmanian Aboriginal Corporation did not provide a submission to the Review.

KEY MESSAGES

There was a general view among the non-Aboriginal submissions that a revised Aboriginal and Dual Naming Policy should allow both Aboriginal and non-Aboriginal organisations, local councils, or individuals to nominate an Aboriginal or dual name directly to the Nomenclature Board; however Aboriginal community responses did not indicate a preferred approach. Most submissions also supported improved consultation and engagement provisions with regional Aboriginal communities and groups.

The majority of submissions also indicated that local Aboriginal groups and organisations should be engaged as part of the authentication process of Aboriginal and dual name proposals, as well as supporting the development of minimum standards to support name nominations. Feedback supported the Board’s ability to seek the consul of any entity or individual that may assist in the authentication and validation of name proposals.

A clear view expressed across submissions was that local and regional Aboriginal groups and organisations should be directly consulted about Aboriginal and dual name proposals, particularly those proposed in their local area and that many Aboriginal community organisations and local groups are seeking opportunities to inform Aboriginal and dual naming in Tasmania. There was unanimous support for the expansion of languages used to inform dual naming to include other Tasmanian Aboriginal languages, local knowledge and for proposals to be based on sound history and research.

The majority of submissions support local government in Tasmania continuing to be actively involved in the Aboriginal and dual naming process, and ensuring that all name proposals to the Nomenclature Board are forwarded to the relevant local council for comment, prior to any formal consideration by the Nomenclature Board.

Lastly, the general view among submissions was that a revised Aboriginal and Dual Naming Policy should include a specific mechanism for the Nomenclature Board to consider and replace all current place names offensive to the Aboriginal community, with some calling for the reconsideration of existing place names adopted under the current Policy.
Issue 1: Nomination of Aboriginal and Dual Name Proposals

There was a general view expressed across non-Aboriginal submissions that a revised Aboriginal and Dual Naming Policy should allow both Aboriginal and non-Aboriginal organisations, local council, or individuals to nominate an Aboriginal or dual name directly to the Nomenclature Board; however Aboriginal community responses did not indicate a preferred approach. Most submissions also supported improved consultation and engagement provisions with regional Aboriginal communities and groups.

Question 1.1: Should a revised Aboriginal and Dual Naming Policy allow both Aboriginal and non-Aboriginal organisations, local council, or individuals to nominate an Aboriginal or dual name directly to the Nomenclature Board?

Eight submissions responded to this question, with seven of them supporting the notion of expanding the criteria for nominating Aboriginal and dual names to other Aboriginal organisations, non-Aboriginal Tasmanians and local councils - in contrast to the current Policy’s provision for name proposals to be submitted by the Tasmanian Aboriginal Corporation (TAC) only. None of the Aboriginal community organisation submissions indicated a preferred position on this question.

While there was broad non-Aboriginal support for this change, strong themes emerged around the administrative requirements to support such changes. For example, one respondent proposed that the nomination process should be ‘open to anyone, so long as the assessment process is transparent and adheres to robust guidelines for research, authenticity, consultation and general community acceptance’1. Another respondent cited a preference for the continuation of one Aboriginal organisation or board such as the TAC responsible for ensuring that the expansion of Aboriginal and dual naming continues to be consistent with historical integrity and clear strategic goals for recognition of and respect for Aboriginal Tasmanian heritage2.

Another non-Aboriginal respondent noted that opening the nomination process to non-Aboriginal Tasmanians would provide a significant opportunity to advance reconciliation in our State. ‘Such nominations may also assist in progressing broader public conversations about what the non-Aboriginal community can do to advance the goals and aspirations of Tasmanian Aboriginal people’3.

Eight submissions identified a need for improved consultation and engagement with Aboriginal organisations and groups, particularly those in regional areas4. Two respondents suggested that

1 submission 4
2 submission 9
3 submission 8
4 submissions 3,4,7,8,10,11,12 & 13
local ‘Aboriginal communities be consulted through the regional / local organisations before any approach is made to the Nomenclature Board’.

The one submission not in support of the question detailed a concern that ‘the disadvantage of this approach would be that an overall strategy for building respect and recognition for Aboriginal Tasmanians could easily be disrupted by well-meant initiatives which unintentionally distract from deeper themes and recognition such as careful acknowledgement of Aboriginal care for country and ecology’.

Four of the five local government submissions agreed that nominations for Aboriginal and dual names should be able to be received from Aboriginal, and non-Aboriginal groups and individuals, including local councils.

**Issue 2: Authenticating Aboriginal and dual names**

The clear view expressed across submissions was that local Aboriginal groups and organisations should be engaged as part of the authentication process of Aboriginal and dual name proposals. The vast majority of submissions also supported the development of minimum standards to support name nominations, and the Board’s ability to seek the consult of any entity or individual that may assist in the authentication and validation of name proposals.

**Question 2.1: Should a revised Aboriginal and Dual Naming Policy allow for a register of supplementary organisations or individuals that may provide expert advice on the authentication of proposed Aboriginal and dual names?**

Ten submissions responded to this question, with nine supporting the development of a register of supplementary organisations that may contribute to the Aboriginal and dual name authentication process. The support of three submissions was qualified by a need to ensure that local Aboriginal groups and organisations contributed to the authentication process, particularly in regards to the authentication of proposed Aboriginal and dual names on their area.

Two Aboriginal community organisation submissions cited a preference to endorse the membership of any authentication register adopted or created by the Nomenclature Board.

One (non-Aboriginal individual) submission highlighted that ‘the TAC appears to have a strong track record of research, advocacy and consultation on the issues of Aboriginal and dual naming. In a small place like Tasmania it would achieve both policy integrity and resource efficiency to empower one Agency, which has a track record of developing resources, mobilizing expertise and consulting effectively, to be the primary proposer of names and name changes’.

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5 Submissions 10 & 12
6 Submission 9
7 Submissions 2, 5, 7, & 11
8 Submissions 12, 13 & 10
9 Submission 13
10 Submissions 10 & 12
11 Submission 9
Question 2.2: Should a revised Aboriginal and Dual Naming Policy include minimum standards for accompanying information to be submitted to the Nomenclature Board with name proposals?

Eleven respondents provided a response to this question. All but one supported the development of minimum standards for information to accompany submissions to the Nomenclature Board. One submission agreed that ‘the Board should be provided with as much evidence as possible in considering whether a dual name is valid or appropriate, we are concerned that the creation of minimum standards for accompanying information may result in legitimate dual names being rejected’\(^{12}\). This respondent also questioned that ‘if minimum standards are to be adopted, there should be consideration of how non-traditional forms of evidence, such as oral histories, can be effectively incorporated into these standards. This should be led by input from Tasmanian Aboriginal people and community organisations’.

One supporting submission detailed that such minimum standards should ‘indicate [the] people and bodies who have been consulted in relation to any chosen name’\(^{13}\).

Question 2.3: Should a revised Aboriginal and Dual Naming Policy enable the Nomenclature Board to consult or engage with any individual, group or entity if it considers that doing so may improve its decision making on proposed Aboriginal and dual names?

There was unanimous support across the 14 respondents that responded to this question. While some respondents also covered this issue in responses to the above two questions (2.2 & 2.3) pertaining to Aboriginal community consultation, there were specific supporting comments that reaffirmed such consultation and engagement should include ‘endorsement by the local [Aboriginal] community organisation’\(^{14}\).

One local government submission supported ‘a policy which requires the provision of supporting information to accompany future nominations and the ability to consult with experts in order to ensure the validity and authenticity or proposed Aboriginal names’\(^{15}\).

Another submission suggested that the Nomenclature Board should simply have one overarching rule that enables it to consult or engage with any organisation that it determines can support the Board’s decision making pertaining to Aboriginal and dual name nominations\(^{16}\).

**Issue 3: Local Aboriginal and dual naming**

The clear view expressed across submissions was that local and regional Aboriginal groups and organisations should be directly consulted about Aboriginal and dual name proposals, particularly those proposed in their local area.

**Question 3.1:** Should a revised Aboriginal and Dual Naming Policy provide improved opportunities for consultation with all Aboriginal organisations and

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\(^{12}\) Submission 8  
\(^{13}\) Submission 1  
\(^{14}\) Submission 10  
\(^{15}\) Submission 7  
\(^{16}\) Submission 1
groups, with a view to enhancing consultation and engagement with organisations that have specific interests in the locations where Aboriginal and dual names are proposed?

There was unanimous support across the 14 respondents that responded to this question, that consultation with Aboriginal community organisations, and particularly those that may have a specific interest in locations where Aboriginal and dual names are proposed, should be improved.

Three Aboriginal community responses called for one Aboriginal group to have ‘a formal role to oversee improved opportunities for consultation with all Aboriginal organisations and communities’\(^\text{17}\). Two submissions noted that such broader Aboriginal community consultation with local groups should be mandatory and evidence of such consultation provided to the Nomenclature Board and the consulted communities\(^\text{18}\).

Two non-Aboriginal respondents noted that both Aboriginal and non-Aboriginal people should be involved in any consultation process, noting that such broader consultation would assist in wider community acceptance and use of Aboriginal and dual names\(^\text{19}\).

Face-to-face consultations expressed concern that local knowledge and oral histories were not being taken into account due to the exclusion of adequate consultation and engagement with local Aboriginal groups with interests in the locations where Aboriginal and dual names are proposed.

Local government respondents supported improved consultation with one noting that such consultation should also be expanded to local ‘specific cultural heritage / history interest groups representative of the locality in question’\(^\text{20}\).

**Issue 4: Palawa kani and the use, spelling, pronunciation and writing of Tasmanian Aboriginal languages under the Policy**

There was a clear view expressed across submissions that many Aboriginal community organisations and local groups are seeking opportunities to inform Aboriginal and dual naming in Tasmania. There was unanimous support for the expansion of languages used to inform dual naming to include other Tasmanian Aboriginal languages, local knowledge and for proposals to be based on sound history and research.

**Question 4.1: Should a revised Aboriginal and Dual Naming Policy refer to the Aboriginal and dual naming of Tasmanian places and features in ‘Tasmanian**
Aboriginal languages’ and to ‘palawa kani’ – noting that the TAC’s palawa kani program can continue to inform name proposals under the Policy?

All of the ten respondents who responded to this question supported the expansion of language/s to inform Aboriginal and dual name proposals to include Tasmanian Aboriginal languages other than palawa kani.

One respondent ‘acknowledged the effort that the Tasmanian Aboriginal [Corporation] has put in over that time to revive language but [we] would have been more supportive if [we] were consulted about the development of palawa kani’. This submission noted that broader Aboriginal community support for palawa kani was more likely if other Aboriginal groups were able to contribute to its development, use and promotion21.

Respondents did not support the exclusive use of palawa kani to inform Aboriginal and dual name proposals, with one submission stating that ‘[proposals] should reflect the original, authentic language of the clan of that area, not the reconstructed palawa kani [language]’22. Three submissions expressed concern that the ‘present policy allows palawa kani to dictate the use, spelling, pronunciation of a contrived language for Tasmanian places and geographical features’ to the exclusion of other organisations and languages. This same submission states that it ‘considers the application of palawa kani to place names [to be] offensive as it is directed by a western linguistic construct’23.

Responses note a preference for the broader application of Tasmanian Aboriginal languages to inform Aboriginal and dual name proposals noting that palawa kani could continue to inform proposals. One Aboriginal community response indicated that they ‘offer another language option’ for use in place names24. One local government submission supported in principle ‘consistent application of language such as palawa kani. However, the final name determined should be considered based on the greater weight of historical evidence and local references where this exist[s]’25.

Question 4.2: Should a revised Aboriginal and Dual Naming Policy allow for name proposals to be informed by any Tasmanian language or group – if supported by historical evidence and research?

There was unanimous support across the 14 respondents that responded to this question, noting that responses to previous questions also related in part to this issue.

One respondent stated that historical evidence and research should be the primary basis upon which Aboriginal and dual name proposals are informed, regardless of whether they are put forward by Aboriginal or non-Aboriginal people26. However, another respondent stated that ‘historical evidence through research, as well as local community consultation, should be the guide to any decision for any dual name and not necessarily based on the weight of evidence’27.

21 Submission 13
22 Submission 14
23 Submissions 10, 12 & 13
24 Submission 6
25 Submission 7
26 Submission 1
27 Submission 4
Two submissions noted they would support ‘name proposals providing they are informed by the diverse Tasmanian [Aboriginal] languages and supported by historical evidence and research’.

**Question 4.3: Should a revised Aboriginal and Dual Naming Policy provide a preference for name proposals to be informed by the language / languages or the original people of the place or feature to be named?**

Ten of the 11 respondents to this question agreed that a revised Aboriginal and Dual Naming Policy should provide a preference for name proposals to be informed by the language or languages or the original people of the place or feature to be named.

One Aboriginal community submission noted that ‘place name proposals [should be brought] back to the community that is affected by the name changes and request referencing to the source of knowledge in regards to chosen names. Local communities [should have] primacy based on local knowledge of country and histories in that particular area’.

Another submission noted that ‘great care should be exercised by the [Nomenclature] Board before any decision is made, certainly until there is a general acceptance of any proposal and any such information should be deferred and not imposed on the community which to some is offensive’.

**Question 4.4: Should a revised Aboriginal and Dual Naming Policy, where more than one name is recorded or known for the one feature or place, adopt the name with the greater weight of historical references as the Aboriginal or dual name?**

Eight respondents supported the adoption of one name, where more than one name is recorded or known for a feature or place to be named. Two respondents provided specific commentary pertaining to this issue.

One non-Aboriginal submission referred to a Canadian model ‘where a single place is often named differently by different communities, naming recognises the names used by all the communities with a historical or traditional interest in the location’.

One non-Aboriginal submission argued that ‘if there is too much debate, then it would surely be better to not force a dual name. If there is already a name in place for the area, stick with it’. One local government submission noted that any revised Policy ‘where more than one name is recorded or known for the one feature or place, should give way to local Aboriginal community support’.

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28 Submissions 10 & 12  
29 Submission 3  
30 Submission 4  
31 Submission 9  
32 Submission 1  
33 Submission 5
Question 4.5: Should a revised Aboriginal and Dual Naming Policy, where a place or feature has more than one name describing parts of the feature or place, appropriately name each part based on historical evidence and research?

There were divergent views across the nine respondents who responded directly to this question.

Two Aboriginal community organisations indicated they supported the retention of all known names where they can be validated by historical research and knowledge - ‘that where a place or feature has more than one name describing parts of the feature or place, appropriately name each part based on historical evidence, local knowledge and research. [If] there are authentic references to more than one name, they should be retained where it is culturally appropriate to do so’.

One local government submission recommended that ‘where a place or feature has more than one name describing parts of the feature or place should be named singularly for clarity, however in exceptional circumstances this principal [sic] could be waived. In this circumstance the decision should be based on local Aboriginal group support’.

### Issue 5: Consultation, engagement and the role of local government

The general expressed across submissions was that local government in Tasmania should continue to be actively involved in the Aboriginal and dual naming process, and ensuring that all name proposals to the Nomenclature Board are forwarded to the relevant local council for comment, prior to any formal consideration by the Nomenclature Board.

Question 5.1: Should a revised Aboriginal and Dual Naming Policy ensure that all name proposals to the Nomenclature Board are forwarded to the relevant local council for comment, prior to any formal consideration by the Nomenclature Board?

Fourteen of the 15 respondents to this question support local government involvement in the Aboriginal and dual naming process prior to the Nomenclature Board’s consideration of a proposal. While there was general support across the respondents some provided additional context that should be considered before formalising the role of local government in any revised Policy.

One submission called for ‘local government to take a more proactive role and certainly be involved in the consultation process’. Other submissions noted that local government support or endorsement is necessary, however ‘should be secondary and non-essential to Aboriginal community support’.

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34 Submissions 10 & 12
35 Submission 5
36 Submission 4
37 Submissions 6 & 8
One Aboriginal community organisation submission called for the ‘establishment of a set of proposals to be developed to ensure that all name proposals to the Nomenclature Board are forwarded via the Local Government Association of Tasmania (LGAT) to the relevant local council for comment, prior to any formal consideration by the Nomenclature Board’

Another Aboriginal organisation ‘endorse[s] that full consultation and proper participation is entered into and the utilization of local government is paramount as they have ongoing responsibility and understanding of naming of places in their jurisdiction’

One respondent concurred with local government involvement, however noted that Councils ‘should also have an opportunity to consult locally on the impact of any name change. This should be part of the open consultation process’

One respondent noted that local government ‘are already included in existing consultation processes [under the existing Policy]’ and cited concerns that any further involvement ‘is likely only to delay what already seems a very slow process’

### Issue 6: Replacing place names (including offensive names) with Aboriginal names

The general view expressed across submissions was that a revised Aboriginal and Dual Naming Policy should include a specific mechanism for the Nomenclature Board to consider and replace all current place names offensive to the Aboriginal community, with some calling for the reconsideration of existing place names adopted under the current policy.

**Question 6.1:** Should a revised Aboriginal and Dual Naming Policy include a specific mechanism for the Nomenclature Board to consider and replace all current place names offensive to the Aboriginal community?

There were 13 responses to this question with all but one submission supporting the development of a specific mechanism for the Nomenclature Board to consider and replace all current place names offensive to the Aboriginal community.

One local government submission stated that ‘as a matter of principle the policy ought make provision for replacing place names including offensive names with Aboriginal names, however, to ensure integrity and acceptance of the community, this needs to be supported with evidence’

Two submissions indicated that some or all names endorsed under the existing Policy may be considered offensive to some Aboriginal people or groups. One respondent noted that while they supported ‘the inclusion of a specific mechanism for the Nomenclature Board to consider

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38 Submission 12  
39 Submission 13  
40 Submission 1  
41 Submission 9  
42 Submission 7
and replace all current place names deemed offensive to Aboriginal communities, they seek to have this expanded to include ‘those [place names] already agreed to under the present policy’\textsuperscript{43}.

One submission noted that ‘what is offensive is a very subjective thing. There are things that I find offensive which others find quite acceptable’\textsuperscript{44}. Another respondent noted that ‘while some names may be considered offensive by some people or some Aboriginal communities, what is more offensive is the imposition of a dual Aboriginal name given to a locality or feature without proper research on its authenticity, consultation or acceptance by the local community’\textsuperscript{45}.

\textsuperscript{43} Submissions 12 & 13
\textsuperscript{44} Submission 1
\textsuperscript{45} Submission 4
## Appendix 1

List of public submissions to the Review of the Aboriginal and Dual Naming Policy

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<tr>
<th>Submission Number</th>
<th>Organisation</th>
<th>Type</th>
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<tbody>
<tr>
<td>1</td>
<td>Linda Luther</td>
<td>Individual</td>
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<tr>
<td>2</td>
<td>Launceston City Council</td>
<td>Local Government</td>
</tr>
<tr>
<td>3</td>
<td>Circular Head Aboriginal Corporation</td>
<td>Aboriginal Community Sector</td>
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<tr>
<td>4</td>
<td>Peter Sims OAM</td>
<td>Individual</td>
</tr>
<tr>
<td>5</td>
<td>Circular Head Council</td>
<td>Local Government</td>
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<tr>
<td>6</td>
<td>Lia Pootah Aboriginal Corporation</td>
<td>Aboriginal Community Sector</td>
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<tr>
<td>7</td>
<td>Huon Valley Council</td>
<td>Local Government</td>
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<tr>
<td>8</td>
<td>The Bowring Family</td>
<td>Individual</td>
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<td>9</td>
<td>Rosa Walden</td>
<td>Individual</td>
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<td>10</td>
<td>melythina tiakana warrana Aboriginal Corporation</td>
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<td>11</td>
<td>Clarence City Council</td>
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<td>12</td>
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<td>13</td>
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