

3311

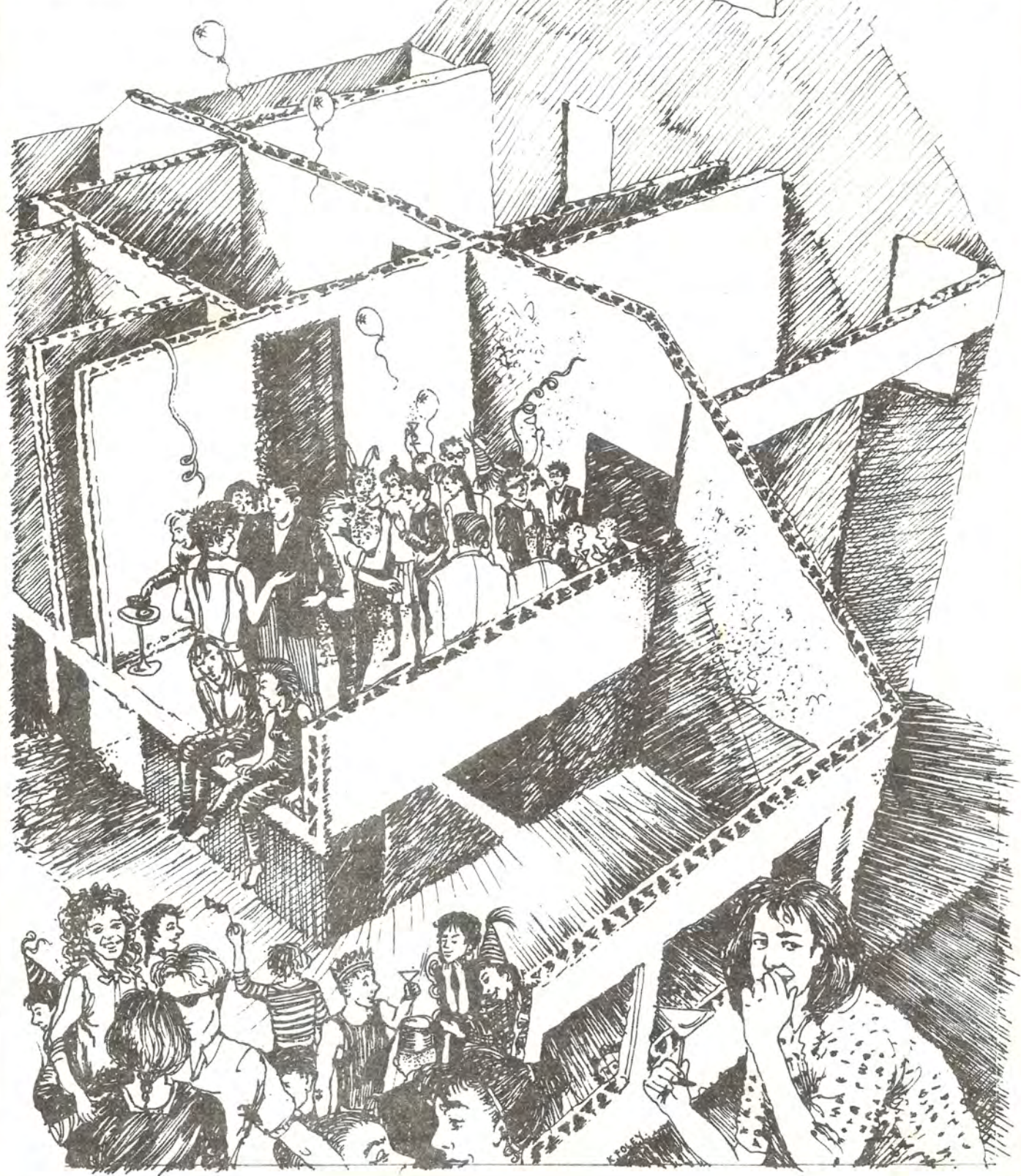
TEMANTS UNION OF
CO-OP LTD J/T/1

68 Bettington St.
Millers Point 2000
Tel: (02) 271 1113

T E N A N T NEWS

N.S.W. JANUARY 1986

No. 27



HAPPY NEW YEAR!

CONTENTS

| | |
|--|----|
| GETTING THE HOUSING ACT TOGETHER IN NSW | 3 |
| CAMPERDOWN | 6 |
| A TENANT AT THE RENTAL BOND BOARD | 7 |
| MOVEABLE DWELLINGS RESIDENT COMMITTEE - UPDATE | 8 |
| SECURE RENTAL HOUSING | 10 |
| CHANGES TO RENT CONTROL | 10 |
| PUBLIC HOUSING | 11 |
| RESIDENTIAL TENANCIES TRIBUNAL PROJECT | 12 |
| WILD BIRDS ON THE MURRAY | 15 |

STOP PRESS

The NSW Department of Housing has announced that it will establish an inquiry into the causes of rapidly rising rents in Sydney and how to limit future increases.

The Premier has asked the Minister for Housing to establish the inquiry and investigate:

- * the likely pattern of rent increases in 1986
- * the main reasons for such increases
- * to what extent, except for avarice, the likely increases are justified
- * by what means, consistent with the right of lessors as well as lessees, such rent increases can be contained.

The Tenants Union welcomes the rent inquiry but maintains that any formulation for rent regulation should be encapsulated in the new Landlord and Tenant legislation forthcoming from Consumer Affairs.

GETTING THE HOUSING ACT TOGETHER IN NSW.

In August this year, N.S.W. Premier Neville Wran announced that a new Department of Housing would be created. This Department would effectively incorporate the Lands Commission, the Housing Commission and some functions of the Department of Co-operative Societies. Significantly, the housing responsibilities of the Department of Consumer Affairs, the most noticeable being private rental sector matters such as the operation of the Landlord Tenant legislation. Rental Bond Board will not go to the new Housing Department.

A number of reasons have been put forward by the N.S.W. Government to illustrate the desirability of this action. These include -

- (a) to increase the ability of developing comprehensive and coherent land and tenancy policy.
- (b) to rationalise and improve the efficiency of bureaucratic activity in the general housing area.
- (c) to create a more favourable environment for new housing initiatives to be developed and implemented.

New legislation to create the Department of Housing and give it a preliminary financial and legal operating base passed through the N.S.W. Parliament on the 27th November. Detailed legislation outlining the full aims and objectives of the Department, its structural arrangements and programs base would be expected to be put to the Parliament in the second half of 1986.

As well as creating a specific new Government Department, the initiative also establishes a Land and Housing Corporation which will be utilised as a major financing mechanism for housing programs. In particular, this corporation will be involved in the raising of private and public sector loans and mixing and matching government and private sector funds in, hopefully productive ways to generate increased housing funds.

The Department of Housing has a new permanent head (Director), Michael Ayres who officially commences on January 1st, 1986. Besides overseeing the implementation process of establishing the new Department, the Director will be reviewing all current housing and land programs, their operation and possibilities for change. A report on this is due to the Housing Minister, currently Frank Walker, by the end of June 1986.

The Implementation Process

The N.S.W. Government has given a commitment to consideration with interested groups over the development and establishment of the Department of Housing. However, as is frequently the case, the time frame for this consultation is extremely short, i.e. two to three weeks and without the offer of any significant additional resources to organisations to consult with their own memberships over the issues involved.

An overall implementation committee has been established to oversee the work of a number of specific subcommittees and to propose detailed recommendations to the Minister. This committee comprises the current Heads of Landcom, Housing Commission and Department of Co-op Societies, the new Director of the Housing Department, senior Ministerial policy advisors, the Co-ordinator of the Implementation Task Force and the Minister.

The subcommittees examining specific issues areas include -

- (a) Legislation
- (b) Housing and Finance
- (c) Housing Land Supply
- (d) Budget and Finance
- (e) Staffing and Administration
- (f) Union Liason
- (g) Industry and interest groups.

It is this latter committee which is being utilised as the formal means of establishing the consultation process.

Its particular role is threefold -

- (a) to identify organisations to consult - the committee claims to have list some 600 to date in the following categories - government agencies, housing consumers, community organisations, trade unions, industry groups, professional associations and academies and existing government advisory structures.
- (b) to identify consultation strategies for this particular exercise the committee is currently distributing a brochure on the new Department of Housing and has written to peak organisations seeking comments on any issues.
- (c) to identify ongoing liason strategies for policy and program development. This would particularly involve the analysis of existing program based Ministerial Advisory committees and what their future role should be as well as looking in detail at consultative mechanisms for major policy development to the Minister and all senior levels of the new Department.

Following the recent Housing Forum (November 29th), Shelter, N.C.O.S.S. and the Tenants' Union have decided to link their efforts together in producing a response to the creation of the new Department. As well, these organisations will be attempting to disseminate information to members and encouraging as much as possible, their direct responses to the Housing Administration.

Some Key Concerns Already

From the few discussions that have been held with representatives of the industry and interest groups committee to date, a number of immediate and long-term concerns have been identified. This is by no means an exhaustive list.



- (a) with the amalgamation of function with the new department, what guarantees are there that public housing objectives will remain a primary concern.
- (b) will financing options being developed over the next six months also directly or indirectly favour other tenure forms than public housing.
- (c) what are the criteria for the Director's review of current programs and will the community housing sector as well as other interest groups have access to input into this prior to its forwarding to the Minister.
- (d) how much access can community housing groups have to the various implementation sub-committees and the main task force.
- (e) what is the fate of existing program based advisory structures during the implementation phase.
- (f) how will policy making procedures within the new Department be developed.
- (g) how will the private rental sector concerns be most effectively dealt with whilst their administrative responsibilities are located elsewhere.
- (h) how can the community housing sector be guaranteed representation and re-sourcing on major policy advisory structures and what are the best mechanisms to implement so that the community sectors voice is heard as loudly as the private sectors and the trade unions.

These are just a few concerns. The time line for this consultation appears to be March 1986 when some basis for general Department objective, structures and program priorities would be coming into shape.



The Tenants' Union has T-shirts available in 5 colour combinations to suit all complexions. The T-shirts costs:

- \$ 8 for pensioners, unemployed etc
- \$10 for part-time workers
- \$12 for workers

CAMPERDOWN

Christmas present for Camperdown Tenants???

The campaign by the Camperdown tenants P.A.T.A., to stop evictions, sales and demolitions of their homes by the Landlord - Prince Alfred Hospital - has been successful in capturing the attention of the Housing Commission.

The Housing Commission has committed a working party of architects, surveyors, assessors, and community project workers for two months to develop a tenants profile on the hospital owned property in Camperdown.

By Christmas the Housing Commission working party will have assessed the tenants for eligibility for public housing and completed a feasibility study on the property regarding its viability for renovation or reconstruction.

The final outcome could lead to Housing Commission purchasing of the stock, though no commitments have yet been made, and tenants have also been given information regarding home purchase.

P.A.T.A. has not slowed its pace though . . . While the Housing Commission has been formulating their recommendations so too have the tenants devised a "Peoples Plan" on what they would like to happen to this Camperdown residential area.

Paramount to the tenants is to keep Camperdown a community of residents without gentrification of this traditionally low income tenanted area. For the community to be properly viable, provision needs to be made for open space and community facilities. (The area has already lost a childcare centre through R.P.A. demolitions for the Salisbury Road bypass).

P.A.T.A.'s "Peoples Plan" will be submitted to both the Housing Commission calling on these government authorities to include the tenants' perspective in their planning policies for the area.

P.A.T.A. was formed in June 1985 and has lead a courageous and undaunting campaign to save their homes. The two months respite on pickets and demonstrations has not weakened the P.A.T.A. group which will remain to campaign for the tenants to stay in their houses or, if there is a Christmas present in the form of a public housing option P.A.T.A. will be there to resource the tenants as a community.



A TENANT AT THE RENTAL BOND BOARD

On 15 August 1985 the Minister for Consumer Affairs Mr George Paciullo, appointed two observers to the Rental Bond Board in place of the statutory ministerial appointee. The two observers are Regina Haertsch and Mr Bruce Murrell former head of the Property Chapter Real Estate Institute of New South Wales. The remaining membership of the Board comprises Mr Philip Holt, Chairman and Head of Department of Consumer Affairs, the Rent Controller, Mr Roger Dives, and a representative of the New South Wales Treasury, Mr Bob Scullion.

Regina has held various positions with the Tenants' Union since 1980 and we hope her presence influences the activities of the Board.

At the beginning of 1983, the Tenants' Union submitted to the Rental Bond Board calling for -

- * funding of Tenants' Union and Tenants' Advice Services
- * funding of Landlord and Tenant Law Reform and a Residential Tenancies Tribunal
- * investment of funds in rental housing

The latest Annual Report of the Rental Bond Board for the year ended 30 June 1985 announces commitment to two of the above principles. Unfortunately there is as yet no timetable for landlord and tenant law reform and hence no budget allowances (HOW LONG MUST TENANTS WAIT!?)

It is however one thing to have commitments and another matter to implement directions. The Bond Board is extremely susceptible to pressures within government and unless tenants succeed in persuading their elected government representatives of, for example, the community need for a range and choice in public rental housing, the surplus funds of the Rental Bond Board may be directed elsewhere.

On another note, the Board is mindful that some tenants are unaware of procedures to recover bonds and efforts are being made to educate tenants particularly migrant tenants.

Where the bond system can be improved by education or administration please notify the Tenants' Union.

The Tenants' Union would welcome any tenants opinions of the kinds of public rental housing tenants would like to see e.g. Housing Commission, Co-operative housing or any other form.

Ring the Union office or write with suggestions.

MOVEABLE DWELLINGS RESIDENTS COMMITTEE - UPDATE

The Minister for Local Government, The Hon. Kevin Stewart has put a recommendation to State Cabinet in favour of a State wide licencing scheme for Caravan Parks and Camping grounds but contrary to the impression given by sensationalised press articles the legislation has not yet been passed by parliament.

Parliament may accept changes to legislation (Section 288a of the Local Government Act) to allow for long term residency in caravan parks and given that the reality is that residents often live in these parks on a long term basis this change legitimises these peoples' situation.

But are the present conditions of caravan parks suitable to long term residency? Will the licensee status of caravan dwellers change to include them as tenants, giving them a bit more protection against immediate notice to quit? Will caravan parks that have long term residents be placed in areas near shopping centres, schools, transport, etc.? And above all are long term caravan parks going to be seen as the answer to the lack of adequate housing whether to rent or buy?

These concerns have been raised with the Minister for Local Government long before he sought legislative change to allow for long term residency in parks. He promised a minimum standard committee and a wide ranging task force to look into these matters. We have yet to see them formed and wonder still if users of these parks will be invited onto them.

However, if the legislation is changed without these committees being formed at the same time, we may see an interim code of standards implemented that does not deal with the real life issues that caravan dwellers face.

The committees must be formed before the code is implemented; caravan dwellers and representatives of park dwellers must be on those committees from their inception.

Already developers are planning monolith mobile home and caravan parks in remote, cheap real estate environs. One such recent mushroom (or should I say toadstool) lies beyond Blacktown miles from public transport, childcare facilities and shops.

(1) If you hear of a development application in your area for a large non-tourist caravan park, write to your local council demanding they consult with the Department of Environment and Planning before giving approval.

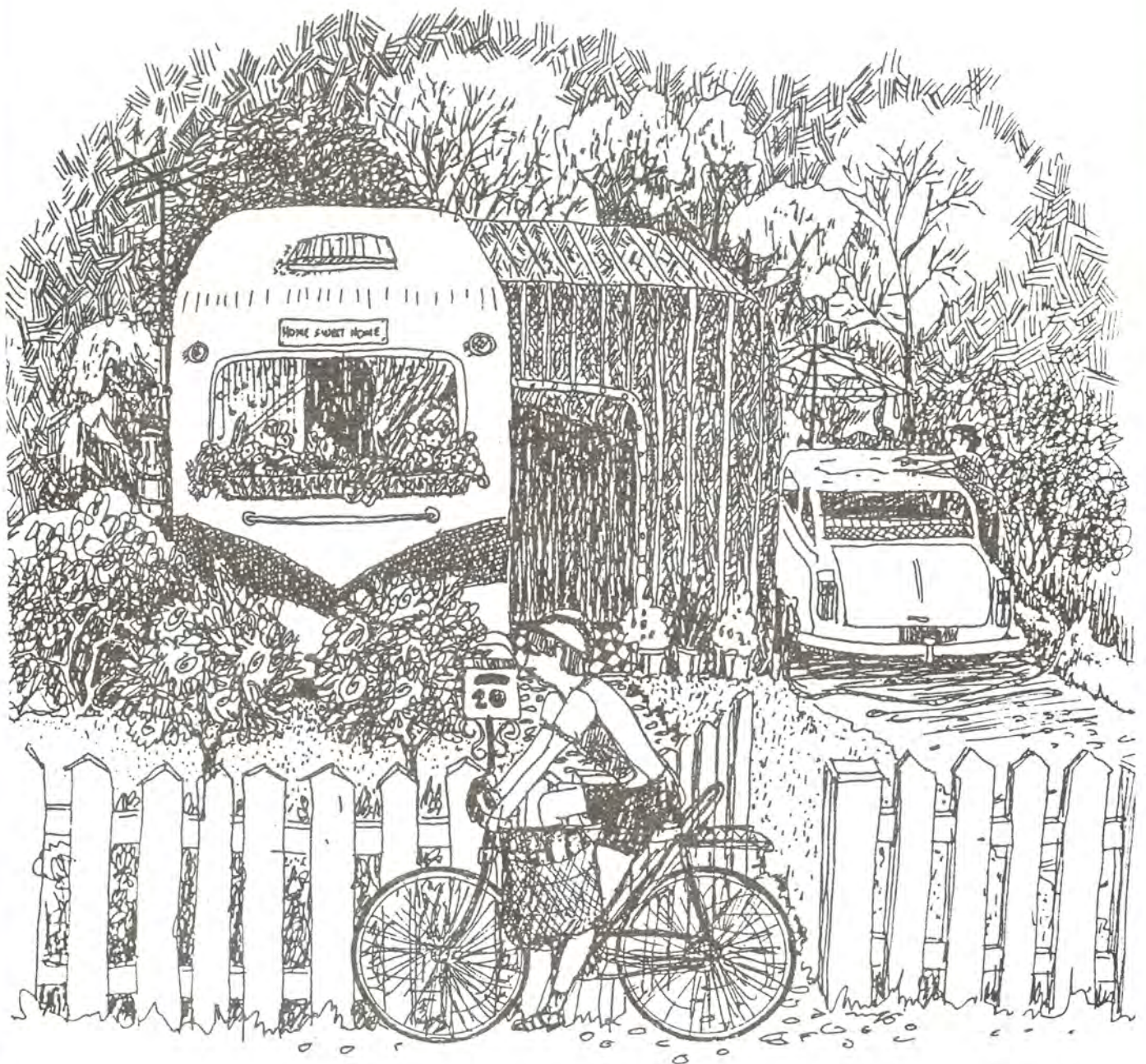
2. If you live in a caravan park and wish to have an input into the standard and services you think are needed for viable long term existence then write to either: -

Movable Dwelling Residence Committee
C/- Tenants' Union
197 George Street
Redfern 2016

or

The Minister for Local Government
Hon. Kevin Stewart
8 Bent Street
Sydney 2000

seeking representation on the committees he once promised to set up to look into the local government code on park standards.



SECURE RENTAL HOUSING

N.S.W. ABOUT TO MISS A CHANCE TO INCREASE THE SUPPLY OF SECURE RENTAL HOUSING

Despite the overwhelming demand for public housing and the severity of housing need in N.S.W., the State Government has not taken up the full amount of low-interest loan funds for public housing available from the Commonwealth for 1985/86.

All other states have done so - even though the housing crisis is probably hitting hardest in N.S.W.

This source of loan funds (nominated funds) is only available at low interest rates (4.5%) if spent on public housing. If used in other ways, as N.S.W. has so far decided to do, market interest rates (around 15%) have to be paid. The money is therefore much better spent on public housing.

N.S.W. this year has allocated \$65 million of nominated funds for public housing. Another \$30 million is available, but only if N.S.W. advises the Commonwealth by the end of December.

This year's allocation of \$65 million is \$15 million less than last year's. N.C.O.S.S. and 15 other housing groups called upon the State Government to take up this \$30 million so as not to lose a vital opportunity to help alleviate the housing crisis in N.S.W.

CHANGES TO RENT CONTROL

A recent Amendment to the 1948 Landlord and Tenant Act further reduces the number of protected tenancies available. The 1948 Act, as distinct from the 1899 Landlord and Tenant Act, affords those that come under it, protection from excessive rents and arbitrary evictions.

The latest amendment reduces the number of protected tenancies by automatically decontrolling tenancies entered into after 1/1/86 (no lease needs to be registered). Thus when an existing protected tenant dies or moves out, the premises are no longer under rent control.

However, those tenants who have moved in prior to 1/1/86 and fulfill the other requirements of the 1948 Act can still call in the provisions of the Act even if they do not find out the premises are protected until after 1/1/86.

Registration of leases:

Landlords wishing to register leases after June 30, 1986 will have to show just cause.

The upshot of this latest move is that whilst the number of protected tenancies will be reduced, there will still be a number of tenants who have the protection of the 1948 Act.

PUBLIC HOUSING

Little by little, NCOSS is trying to come to grips with the intricacies of the financing of public housing in NSW. More so than in almost any other area of State spending, the information provided in the State Budget papers tells one amazingly little. The barest outline is given about where the money comes from, the extent to which funding sources have been full tapped, how the NSW contribution compares with other States, or previous years' allocations, and how the money is to be spent.

Recent discussions have, however, helped to give us a bit of a clearer picture. From NCOSS' reading of the situation, several important points emerge.

1. The State's contribution to public housing has gone up this year, but the increase is in the form of loans at market rates. This is despite the fact that nominated funds available from the Commonwealth at 4.5%, i.e. well below market rates, have not been fully taken up. NSW had the opportunity this year of borrowing \$95 million in nominated funds at this low interest rate, but chose to nominate only \$65 million. NSW is the only state not borrowing from this source to the full capacity set by the Commonwealth. NCOSS has been unable so far to get an answer from the Premier or Treasurer as to why this has been allowed to happen, given the current enormous demand for public housing.

2) Having borrowed a substantial proportion (\$103 million) at market rates means that overall the average interest rate which the Housing Commission has to service is the highest it has been over the last decade. This being in the context of Housing Commission waiting list at the highest they have been over the last decade.

3) In past years a significant component of the overall allocation to the Housing Commission has been its own internal surpluses (from rents, sales, internal reserves, etc.) this year, mostly due to the changeover to cost rather than market rents, this component is down 28% on last year. Internal surpluses are unlikely to be a significant source of funds again in the future as the Commission now makes a loss on its mainstream housing activities. In the last couple of years this loss has largely been 'covered' by an increase in Commonwealth allocation; however, the State has reacted instead by offering high interest funds in favour of low interest nominated funds (see (1) above).

Another point to make here is that revolving funds (generated by the Commission of Department of Co-operative Societies) are, in a sense, the re-use of money originally provided by the Commonwealth. Is it acceptable therefore, for the State to use these funds to match the Commonwealth's, as provided in Commonwealth State Housing Agreement?

It is increasingly apparent to NCOSS and other housing groups that there needs to be some serious re-thinking about the financing of public housing in NSW particularly by Treasury. Making minor adjustments to existing financing arrangements is a patently inadequate response to the current housing crisis facing low-income earners.



RESIDENTIAL TENANCIES TRIBUNAL PROJECT

As part of the long promised reform of the Landlord and Tenant Act, the Minister for Consumer Affairs has assured us that a Residential Tenancies Tribunal will be introduced. This tribunal would cover all tenancy matters unlike the present situation where the Consumer Claims Tribunal only handles rental bond disputes. (Most other matters are currently dealt with in one or other of the traditional Courts depending on the nature of the dispute).

The main attraction of the tribunal system is that it can provide a relatively quick, cheap and informal mechanism for dispute resolution. However, the experience of Victoria and South Australia (which have R.T.T.'s operating for several years) suggests that the tribunal can only be as effective as:

1. the Act which empowers it,
2. the Referees appointed to it, and
3. the resources made available to it.

If these three points are not adequately addressed, there is justifiable ground for doubting the effectiveness of any tribunal in providing redress for tenants' grievances. In particular, if the pending legislation does not include significant improvements in, and protection of, basic tenant rights such as security of tenure, tenants will not be enthusiastic about bringing their disputes before the tribunal. Thus there is the very real danger that the introduction of a tribunal could prove a waste of time and money, and merely encourage an arena of second-class justice for tenants.

TENANT UNION ACTION

As a response to these concerns, the Tenants' Union has undertaken a short term project to look at the introduction and operation of a Residential Tenancies Tribunal in New South Wales. As our tribunal is likely to be modelled on those already established in South Australia and Victoria, the major focus of the research has been on these two tribunals to discover the good points which we might wish to incorporate, and the pitfalls which we would hope to avoid. Special efforts have been made to obtain the views of those who have had contact with the tribunals, especially community groups who advise and/or support tenants when a tenancy dispute or problem arises.

VICTORIA AND SOUTH AUSTRALIA

The first point to make is that, despite the obvious problems associated with the tribunal approach, all people contacted felt that the Tribunals represented a vast improvement over the previous situation, largely because of the reformed tenancy legislation (introduced in South Australia in 1978 and Victoria in 1980). This legislation defines the general rights and duties of both landlord and tenant, as well as dealing with specific areas of concern important to any tenancy agreement, such as termination, eviction, security deposits, rent increases, repairs and maintenance, and penalties for breaches of the tenancy agreement or legislation.

Of particular benefit to tenants has been the introduction of specific grounds and periods of notice required for termination. For example, in Victoria the landlord must give at least 120 days notice to quit, unless he/she wants to sell, extensively renovate or demolish the premises, or requires the premises to live in personally or for his/her immediate family (in which case 60 days notice is required). Thus, unless the tenant has seriously breached the terms of the Agreement or is physically endangering life or

property, he/she can be assured of at least 2 months tenure, before action can be taken for eviction.

Such terms do not add up to real security of tenure, however, and it is crucial to push for no eviction without just cause, to prevent retaliatory evictions against tenants seeking to enforce their rights.

Thus, for the R.T.T. to be effective, it must operate within a strong and clearly defined legislative framework. This legislation needs to be administered by Tribunal members who are well versed in the Act, but also sensitive to the broader framework in which tenancy disputes arise.

The selection and training of Referees is obviously of prime importance in terms of the values, skills, and expectations which they will bring to the hearing room.

In Victoria, all Referees must have legal qualifications and experience, which has tended to make the hearings somewhat formal and legalistic. In addition, the emphasis on 'judicial independence' has meant that Referees tend to feel that they have the right to conduct their hearings as they think fit, which has led to inconsistencies in procedure and decision making style.

By contrast, South Australia has attempted to introduce with some success, some non legal Members who have had a broad community background.

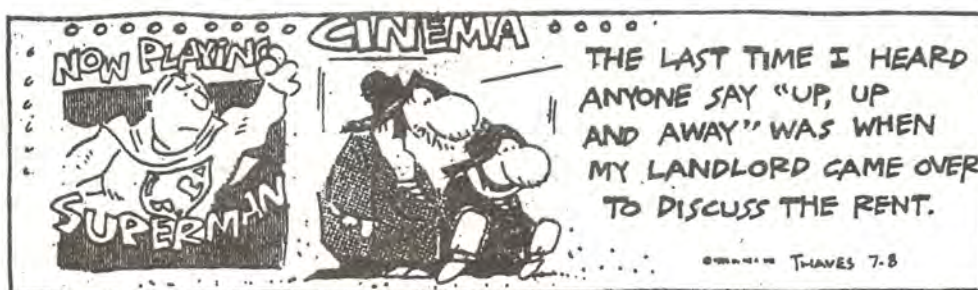
There is also the need to improve the on-going monitoring of the Referees and their decisions, and to foster greater liaison between them to benefit from their collective experiences and to promote consistency in procedures and interpretations.

In addition, mechanisms must be established to make all staff members working for the R.T.T. more aware of the needs of specific groups (non-english speaking migrants, the aged, single parents, women, aboriginals, disabled, unemployed . . .). This is particularly important for those handling telephone or counter enquiries, but also for those operating hearings and making policy decisions.

At the policy level, decision must be made to adequately resource the R.T.T. both with regards to staff and money. Both interstate R.T.T.'s have lengthy delays between application and hearing due largely to the lack of staff to process claims. In addition, the lack of funds for keeping statistics, publishing advice and information material, and promoting the R.T.T., has meant that such information is either rationed or simply not available.

In Victoria, the R.T.T. does not produce material in other languages, preferring to fund community groups to fulfil this function - totally unsatisfactory. South Australia has acknowledged its responsibilities in this area to the extent of publishing tenants' rights and obligation booklets in four (only) languages. However, neither state has seriously considered developing specific programs aimed at a particular target group or focussing on a specific issue.

Underlying these problems is an unwillingness to address the differing problems of access and the actual non-use of the Tribunals by certain individuals or groups of people. Until these issues are taken up, the Tribunals will continue to be used predominantly by landlords (or their Agents) because they are more familiar with the proceedings and the legislation, and because they have less to lose - they have not put up a bond, nor are they in fear of losing their home.



In addition, the poor record of prosecution and the low level of penalties imposed do not provide a great disincentive to disregard the legislation or Tribunal orders.

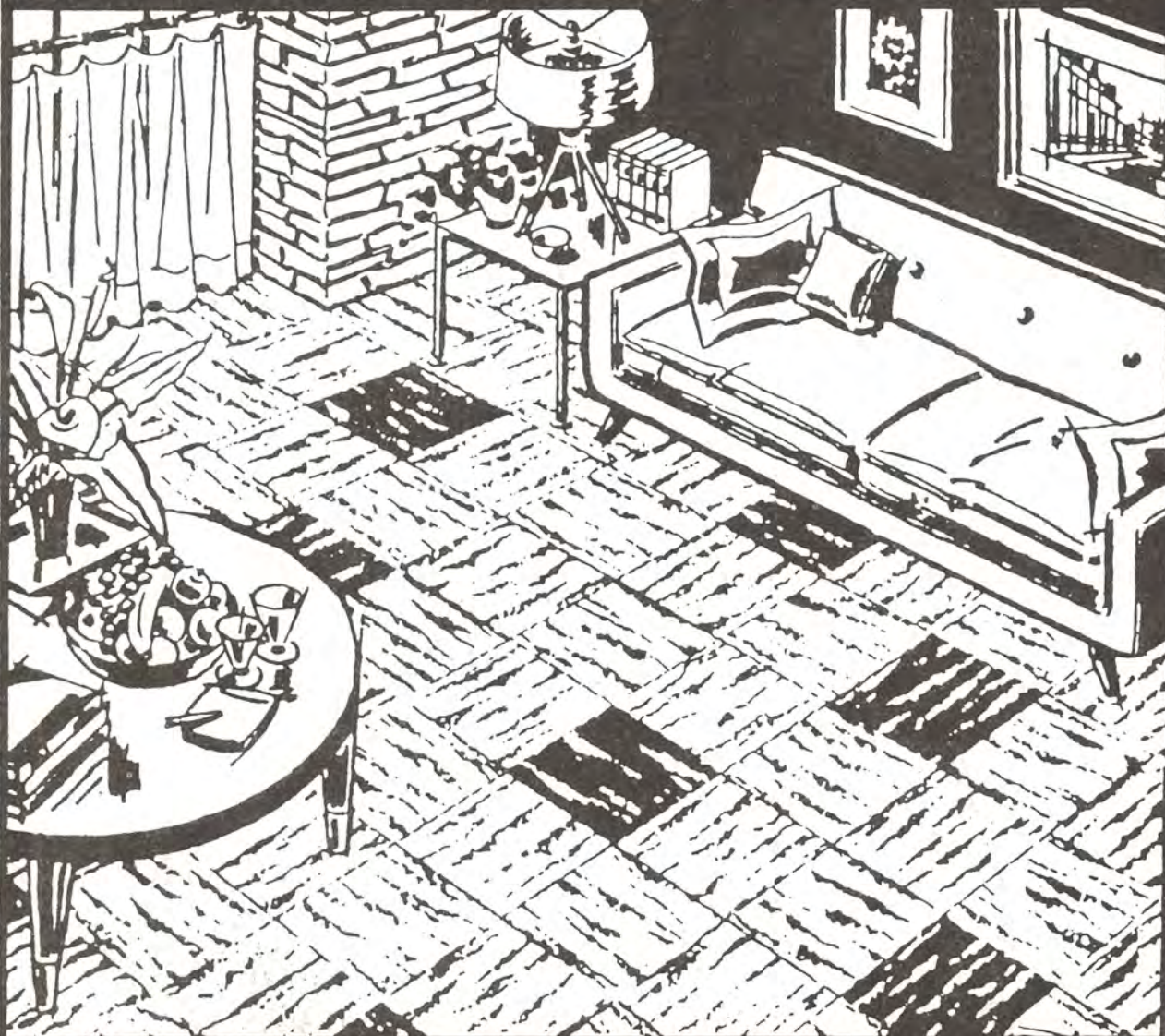
CONCLUSION

A Residential Tenancy Tribunal does have the potential to provide a relatively speedy, cheap and informal forum for dispute resolution. Even with the problems evidenced in the operation of the two interstate Tribunals, the situation is a considerable improvement on the largely unregulated tenancy environment experienced before the new legislation was introduced.

However, much still needs to be improved. Our legislation needs to ensure security of tenure, and clearly spell out the rights and obligations of both landlords and Tenants. Referees (and staff) need to be carefully selected, trained and monitored, adequate resources need to be made available, and much more attention must be paid to enforcement and prosecution activity in order to make the Tribunal work as equitably and efficiently as possible, especially for the most disadvantaged tenants in the rental sector.

If you would like more information on the above project, or would like to take part in a Working Party gearing up for the NEW LEGISLATION !!!!! next year please contact Sue Creek at the Tenants' Union.

IT'S YOUR HOME, DEFEND IT!



JOIN THE NSW TENANTS UNION

197 GEORGE ST. REDFERN 6997605 MEMBERSHIP: \$6 / \$2 concession

FOR ADVICE PHONE THE HOTLINE: 698 8033

CONTACT YOUR LOCAL TENANTS ADVICE SERVICE AT...

WILD BIRDS ON THE MURRAY

As the river Murray slaps the floor
of the branbag shanties of the poor
whole families flee. And predators paw
in tense anticipation.

And we children who played by the river's side
are sent away as secret men decide,
with kindly smiles and a housing guide,
how little should be done.

For the spreading reach of their ranch-estate,
(covetting beyond its gate),
bides time for the mainstream to abate
for their private boulevard.

And far away we dispossessed hear our song
of a lonely figure in a billabong
where magpies guard where THEY belong
.. swooping though paupers mourn.

For the wild birds STILL tread and flap and beat
on the river. Strong wings and feet
of crying magpies STILL greet
intruders near nests and young.

And elusively the bullfrogs croak
near the gost of our shanty's curling smoke
while parent-waters, laughing, joke
at such complacency.

And billabongs as always wait
where flooded mother-streams abate
And wild birds call and cry and mate
And swagmen wait on billies.

Big cod, I know, wait down below
as up above wild dust-storms blow
putting will-willies on the go
while we talk by lantern light.

And I know the wind that stirs the trees
will bring down boughs of faded leaves
like those that called beneath our eaves
flapping walls of white washed bags

And then wild things, with Freedom's grace
will blend in with the human race
And, with sadness quickening Nature's pace,
the culled, bad things, will die.

Wally Campbell



CABRAMATTA TENANCY WORKING PARTY REPORT

"REFORMING A FEUDAL LAW"

2nd Edition now available

Send payment to:

AUSTRALIAN CONSUMER'S ASSOCIATION

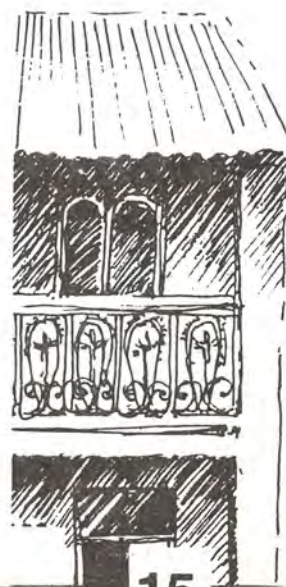
57 Carrington Road, Marrickville

Phone: 558-0099

COST

\$7.50 for Organisations

\$6.00 for Individuals



APPLICATION TO JOIN TENANTS' UNION

Name.....

Address.....

Telephone.....

Occupation.....

Please Tick

Are you a Tenant? Squatter?

Are you a Home Owner?

Cost: Pensioners/Unemployed/Students \$2
(1 share + \$1 annual service fee)

| | |
|--------------------------------------|------|
| Workers | \$6 |
| (1 share + \$5 annual service fee) | |
| Organisations | \$15 |
| (5 shares + \$10 annual service fee) | |
| Donations | \$ |
| I enclose | \$ |

This covers purchase of shares and a service fee.

I declare that I am over 18 years of age.

Signature

Witness.....

Date.....

Return to:

Tenants' Union of NSW Co-op Ltd
197 George Street, REDFERN 2016

OFFICE USE ONLY

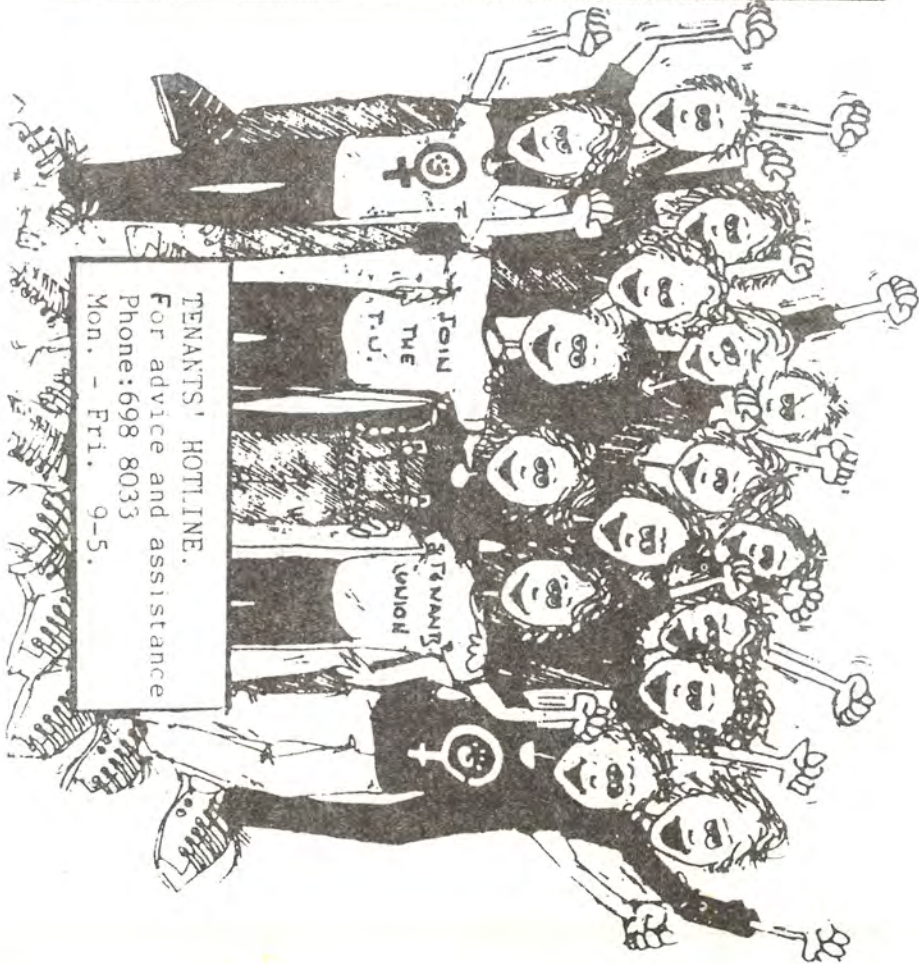
Service Donation

Shares Non-member trust account

Receipt No.....

Membership No.....

Get Your
Friends
to Join the
Tenants' Union!



TENANT NEWS

TENANTS' UNION OF NSW CO-OP LTD
197 GEORGE STREET
REDFERN NSW 2016

REGISTERED BY AUSTRALIA POST
PUBLICATION NUMBER NBH 2043

POSTAGE PAID IN AUSTRALIA
POSTAGE PAID IN AUSTRALIA