



This is a repository copy of *Black and Green: The future of Indigenous-environmental relations in Australia*.

White Rose Research Online URL for this paper: http://eprints.whiterose.ac.uk/124740/

Version: Published Version

#### Article:

Pickerill, J.M. orcid.org/0000-0002-2070-705X (2018) Black and Green: The future of Indigenous-environmental relations in Australia. Environmental Politics, 27 (6). pp. 1122-1145. ISSN 0964-4016

https://doi.org/10.1080/09644016.2018.1466464

#### Reuse

This article is distributed under the terms of the Creative Commons Attribution-NonCommercial-NoDerivs (CC BY-NC-ND) licence. This licence only allows you to download this work and share it with others as long as you credit the authors, but you can't change the article in any way or use it commercially. More information and the full terms of the licence here: https://creativecommons.org/licenses/

## Takedown

If you consider content in White Rose Research Online to be in breach of UK law, please notify us by emailing eprints@whiterose.ac.uk including the URL of the record and the reason for the withdrawal request.





# **Environmental Politics**



ISSN: 0964-4016 (Print) 1743-8934 (Online) Journal homepage: http://www.tandfonline.com/loi/fenp20

# Black and green: the future of Indigenous-environmentalist relations in Australia

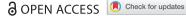
# Jenny Pickerill

**To cite this article:** Jenny Pickerill (2018): Black and green: the future of Indigenous–environmentalist relations in Australia, Environmental Politics, DOI: 10.1080/09644016.2018.1466464

To link to this article: <a href="https://doi.org/10.1080/09644016.2018.1466464">https://doi.org/10.1080/09644016.2018.1466464</a>

9	© 2018 The Author(s). Published by Informa UK Limited, trading as Taylor & Francis Group
	Published online: 24 Apr 2018.
	Submit your article to this journal 🗷
hil	Article views: 100
Q <sup>1</sup>	View related articles 🗷
CrossMark	View Crossmark data 🗹







# Black and green: the future of Indigenousenvironmentalist relations in Australia

Jenny Pickerill (b)

Department of Geography, University of Sheffield, England

#### **ABSTRACT**

Indigenous-environmental relations in Australia have a difficult history. Two examples from fieldwork in northern Australia - the Wild Rivers campaign in Queensland and contestations over Walmadan (James Price Point) in Western Australia – facilitate exploration of the contrast between the sustained, multiple and detailed efforts that environmental groups have put into black-green relations, and the public perception that environmentalists do not care about Indigenous people. The multiple competing political narratives of different Indigenous activists and environmental organisations around notions of environment and economy are identified. This detailed analysis suggests that environmentalists need to advocate for a peopled-landscape and all activists must engage in a more nuanced discussion and understanding of diverse forms of economy.

KEYWORDS Indigenous; environmentalist; activism; Cape York; Wild Rivers; James Price Point

#### Introduction

Relations between Indigenous and environmental activists have historically been strained (Vincent and Neale 2016). There are numerous examples worldwide of Indigenous peoples (those who assert Traditional Ownership, and cultural heritage, over particular lands) struggling with the consequences of environmental organisations' actions. This has included Indigenous people being pushed off land to make way for the creation of National Parks, new legislation being introduced which limits Indigenous people's use of resources they have traditionally consumed (such as limitations on what and how animals can be hunted) and a lack of consultation with Indigenous people as to future uses of land for which they assert traditional ownership (Poirer and Ostergren 2002, Adams and Milligan 2003).

The often-fractious relationships between Indigenous people and environmental organisations are of particular interest because of recent public disputes in Australia, such as around the Wild Rivers Act, where



Indigenous leaders accused environmental groups of racism and colonialism. Such contestations have been framed as environmental protection taking precedence over economic opportunities for Indigenous people, and raise concerns about the effectiveness and outcomes of environmentalism (Vincent and Neale 2017). The term 'environmentalist' also has an antagonistic legacy and a fixed exclusionary ontology in Australia that has alienated a variety of sectors of society over the years and overshadows contemporary attempts at collaboration. I explore how better relations can be built between environmentalists and Indigenous activists that would improve both social justice and environmental outcomes for all.

In Australia, significant changes to the economy (notably the resource 'boom'), land rights (increased Indigenous control of land through a variety of instruments) and an increasing focus on the future of the north (with its far greater concentrations of Indigenous people) are creating new 'geographies of conservation and Indigenous land' (Moorcroft and Adams 2014, p. 485). In these emerging geographies, environmental groups are increasingly working in regions of Australia where Indigenous communities have legal title to lands. Without adequate discussion, collaboration and Indigenous self-determination, Indigenous-environmental relations can be problematic (Smith 2005a, Barbour and Schlesinger 2012). There are multiple pressures on such relations including the diversity of Indigenous political positions, mainstream media reporting, the power of the resource sector, the inequity of native title deliberations and the urgent needs of Indigenous communities (Ritter 2014, Land 2015).

Australia is a primary resource provider in a growing global resource market (Schandl and West 2012). Its resource sector has enjoyed a financial boom that has supported a powerful resource industry lobby and state government support for further growth (Bishop O'Faircheallaigh 2013, Brueckner et al. 2014). The rapid growth in global demand for mineral and energy resources has had a direct impact; the rise in commodity prices made mining more profitable, with the result that mining dominates Australian exports more than in previous booms (Measham et al. 2013). Even as commodity prices fluctuated, Australia has identified new primary resources to respond to changed demands, so that 'Australia could become the world's largest liquefied natural gas (LNG) exporter by 2021' (Espig and de Rijke 2016, p. 82). This growth and reliance on natural resource extraction has immediate and substantial impacts on particular places, predominantly northern non-urban regions often with significant Indigenous presence. This resources 'boom' generates increasing critical pressure on certain environments (Hodgkinson et al. 2014), communities (Haslam Mckenzie 2013) and economies (Prior et al. 2012), including concentration of resource extraction industries, loss of other

forms of economy, negative environmental impacts and uneven wealth distribution.

The terms 'Indigenous' and 'environmentalist' are used here as descriptors while acknowledging that they are broad and contested categories. In particular, Indigenous identity is fluid and complex, and in regions such as the Kimberley there is a long ancestry of mixed descent genealogies with East Asian communities (Ganter et al. 2006). In many ways, these are false categories that hide great complexity, but they are employed as useful political signifiers and devices while acknowledging that the terms can be problematic (Land 2015). Likewise, the terms 'environment' and 'country' are used to signify different conceptualisations of nature (Rose 2004, Black 2011, Bawaka Country et al. 2013). 'Country' is an Indigenous concept that encapsulates place (land and sea) and all its inherent relations, beings and value (including people), while 'environment' is used here to represent environmentalists' use of the term, often a form of pristine 'first nature' (Jackson 1995).

Understanding Indigenous-environmental relations, and therefore identifying possible ways forward for the future, requires detailed analysis of how specific campaigns worked (or why they did not). Using recent examples of environmental and Indigenous campaigns in northern Australia the Wild Rivers campaign and contestations over Walmadan (known by settlers as James Price Point) in Queensland and Western Australia respectively - I examine the complexity of Indigenous-environmental relations and, thereby, the future of environmental organisations in Australia. I do this by identifying the multiple competing political narratives of different Indigenous activists and environmental organisations around notions of environment and economy. The construction of these contrasting political positions is then critically analysed to examine how activists have sought to justify or navigate them and therefore what potential exists for future moments of alliance

# Methodology

My research was conducted in two separate field trips in 2005 and 2011 to northern Australia, both conducted with the intent of examining how Australian environmental organisations were engaging with, and responding to, Indigenous claims. Each trip lasted 3 months but, for a non-Indigenous English academic, both trips were ultimately short-term and extractive. In both cases, data collection finished before the campaigns ended; thus this research is a snapshot of each case, with some activists coming to prominence after the data collection period. The research was intended as a precursor to longer-term engagement that would have allowed more Indigenous-led collaboration, but funding and other circumstances precluded this.

These two regions and the specific campaigns around the Wild Rivers Act and proposed development at Walmadan were chosen because they were sites of high profile international environmental campaigns, on land assertively claimed as Indigenous; both triggered public Indigenous backlash against the environmental organisations involved, and the conflicts were around a legal framework that facilitated state government power and delegitimised Indigenous concerns. They are also quite different in that the Wild Rivers Act was a state-led attempt at environmental protection supported by some environmental organisations, and the development at Walmadan was a state-supported attempt to industrialise, with likely negative implications for the environment. Both cases, however, compromised environmentalists' notions of an 'untouched' (or 'first' nature) environment.

Material was collated through 53 in-depth interviews: 22 with activists involved in environmental campaigns in Cape York (Queensland), and 31 with activists in the Kimberley (Western Australia). In each region, just over a third of activists interviewed self-identified as Indigenous. Activists, identified as people actively involved in environmental campaigns, whether as supporters or objectors, included a broad range of types of group and organisation (Table 1). All interviewees were given verbal and written information about the project, signed consent forms and were given an opportunity to withdraw from the project at any time. Secondary material was collated from Australian University archives, Indigenous organisations and their records, public museums and state libraries, environmental organisations' libraries, campaign leaflets and flyers, and Indigenous autobiographies.

#### Wild Rivers, Cape York

Cape York Peninsula, in the far north of Queensland, has been a site of environmental campaigns for decades with protests about the protection of Starke, the McIlwraith Range and Shelburne Bay leading to the creation of National Parks, their associated environmental protection and Indigenous perceptions of dispossession (Figure 1) (Smith 2005a). The region is threatened by land clearing (often through burning) for pastoralism, mining, and overuse and pollution of waterways (Ockwell and Rydin 2006, Schneiders 2006). Cape York is also home to the world's largest mine, Rio Tinto Alcan, at Weipa (Slater 2013). Pastoralism is a key economic activity in the region 'the foundation for the lived experience of the regional landscape among the senior generations of Aboriginal families across the region' (Smith 2005b, p. 227). Recently, there were renewed calls to 'develop' the region by improving roads and building extensive rainwater capture and irrigation systems, further extending its use for food production and cattle ranching.

Cape York's population is approximately 45% Indigenous, significantly more than the Australian national average of 3% (Kimberley Law and Culture Centre



Table 1. Organisations and groups included in research

Region	Type of organisation	Interviews conducted with activists from
Kimberley, Western	National environmental	The Greens
Australia	organisations	The Wilderness Society (TWS)
		WWF
		PEW Charitable Trust
		Conservation Volunteers
		EcoTrust Australia
	Kimberley-based	Environs Kimberley (EK)
	environmental groups	Birdwood Downs
		Save the Kimberley
	Kimberley Indigenous	Kimberley Land Council (KLC)
	organisations	Nulungu Research Institute
		Yawuru Group
		Madjulla .
		Nyikina
		Middle Lagoon
		Two Moons
		KRED Enterprises
Cape York,	National environmental	The Wilderness Society
Queensland	organisations	WWF
	J	Australian Conservation Foundation (ACF)
	Queensland-based	Friends of the Earth Brisbane
	environmental groups	Northern Australia Environmental Alliance
	· .	North Queensland Conservation Council
		Burdekin Dry Tropics Board
		Cairns and Far North Environment Centre (CAFNEC)
	Queensland Indigenous	Mossman Gorge Aboriginal Community
	organisations	Indigenous Enterprise Partnerships
	3	Balkanu Cape York Development Corporation
		Bamanga Bubu Ngadimunku Inc
		Wuthathi Tribal Council
		North Australian Indigenous Land and Sea Management Alliance

2006). Land tenure is complicated: although Indigenous people tend not to own land under freehold title, they are heavily involved in the governance of land through statutory arrangements such as Indigenous Land Use Agreements, land grants, co-management arrangements, and Indigenous Protected Areas (IPAs), Indigenous pastoral leases and Native Title determination (Muller 2003, Langton et al. 2005).

The Wild Rivers Act (Qld) 2005 was a commitment by the Queensland government to identify and protect 'near-pristine' rivers (Neale 2011). Four rivers were declared 'Wild Rivers' in Cape York (Wenlock, Archer, Stewart and Lockhart Rivers). The Act itself had limited regulatory power; certain developments were prohibited in a 1-km High Preservation Area buffer around designated rivers but if proposed developments were deemed unlikely to affect the health of the river they were permitted (Marks 2007). The Act proved deeply controversial (Altman 2010, Smith 2012). It received significant support from environmental organisations, particularly The

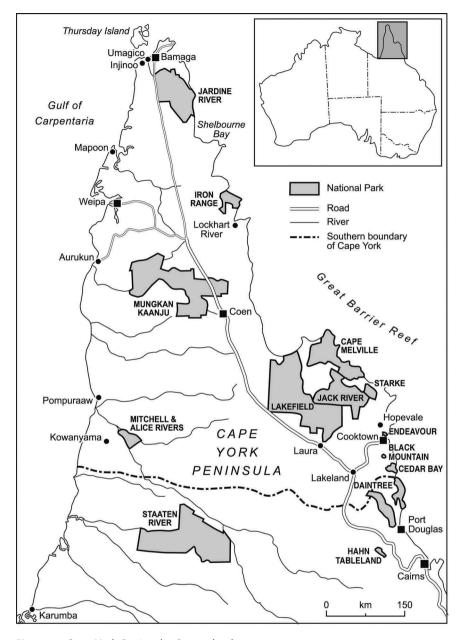


Figure 1. Cape York Peninsula, Queensland.

Wilderness Society (TWS), but Indigenous people were divided. Eventually, in June 2014, a Federal Court judge declared that the original three rivers determined as Wild Rivers in Cape York (Archer, Stewart and Lockhart Rivers) were declared without due process and without enough consultation



with Traditional Owners and these rivers were delisted. Instead, the Queensland government sought to implement its plan for environmental management areas through the Regional Planning Interests Act(2014) in order to supersede what was left of the Act.

#### Walmadan (James Price Point), Kimberley

The Kimberley, in the north of Western Australia, has strong similarities with Cape York. Also in the tropical north, it is considered 'one of the most ecologically diverse areas in the world ... a biodiversity hotspot' (Beazley, in Laurie 2010, i). Like Cape York, approximately 50% of its population identifies as Indigenous. Since settlers arrived in the region, Indigenous people have been massacred, dispossessed from their land, language and culture, and forced to work for little payment. Most recently, in 2014, the Western Australian state government announced plans to close 150 'remote' Indigenous communities on the premise of economic necessity and social policy advantages, a proposal roundly criticised for being yet another colonial act of dispossession (Howitt and McLean 2015).

The Kimberley has long been a site of settler attempts to generate income from cattle and sheep stations, cotton farms and mining. Largescale irrigation projects were built to provide water for pastoralism and mining, and excluded the rights of Indigenous people to the land or water resources implicated (Lane 2004, McLean 2012, 2014). Resource extraction (particularly diamond, nickel and iron mines) has been on-going since the 1970s but at a relatively small scale. The first commercial diamond mine, Argyle in the East Kimberley, officially opened in 1985. Only since 2000 has the region become a focus of Federal and international attention as a site of potential industrialisation, with plans to extend activities into gas, oil, copper, bauxite, silver, lead, plutonium, palladium, coal, zinc, lead, uranium and base metal extraction (Figure 2).

Despite the significant Indigenous presence, little land in the Kimberley has been returned to Indigenous communities via Native Title declarations. Instead, land is largely owned either by the state or private entities, particularly large-scale cattle farms and mining interests and only '1% of state waters and 6% of the terrestrial landscape is protected' (Martin Pritchard, Environs Kimberley, Broome, interview). There are a few, small, National Parks at Mitchell River, Drysdale River, Purnululu, Geikie Gorge, Brooking Gorge, and Windjana Gorge, and four additional reserves and conservation parks, but a much greater proportion of the region is protected as IPAs. There are often promises to protect more of the region and in 2011 the Federal Government announced that 19 million hectares would be heritage listed.

In 2009 the Western Australian government chose Walmadan (James Price Point) on the Dampier Peninsula, just north of Broome, as the site for

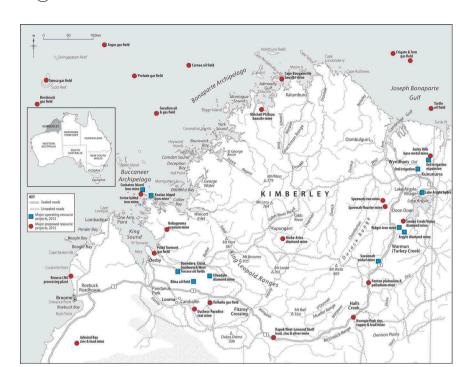
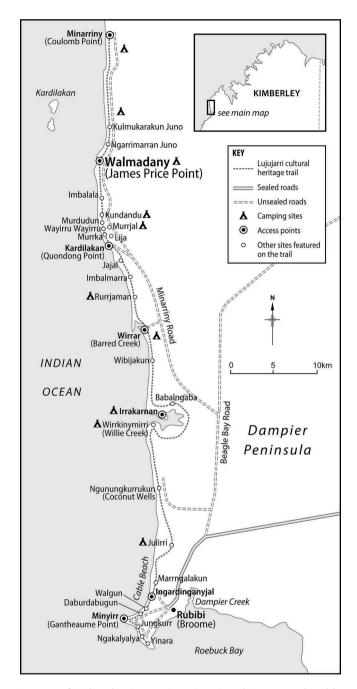


Figure 2. Existing and proposed resource extraction projects in the Kimberley, Western Australia.

a new Browse LNG gas processing plant. The development was lead by Woodside Energy Ltd, but also involved (at different stages) Shell, BP, PetroChina, Chervon, Japan Australia LNG (a joint venture of Mitsubishi and Mitsui) and BHP Billiton Petroleum, with the intention that the gas extracted could be used to power the expanding extraction industries across the region (Stephenson and Hunter 2014).

Walmadan is on land without formal Indigenous ownership though it is the traditional home of the Jabirr Jabirr and Goolarabooloo people who submitted a joint Native Title claim for much of the bottom south-west corner of the peninsula. The Goolarabooloo people established the Lujujarri cultural heritage trail from Minarriny to Yinara (Figure 3). A celebration of Indigenous culture and knowledge, it connects key spiritual sites and traditional campsites along the west coast of Dampier Peninsula; Walmadan is a key point along the trail. The trail follows the path of the Song Cycle and is used as an important cultural teaching space. Despite being relatively close to Broome (32 miles north), the regional capital, Walmadan has little infrastructure and few services, access is via red sandy tracks, water is from boreholes and electricity is from generators.



**Figure 3.** Location of Walmadan (James Price Point) and Lujujarri cultural heritage trail on Dampier Peninsula, Kimberley, Australia.

Any development, especially industrial, would likely radically alter the peninsula (Muir 2012).

The State government and Woodside sought to make a deal with the Kimberley Land Council (KLC), the peak regional Indigenous body, to support the gas development in exchange for AUS\$1.5 billion in compensation over 30 years (Ruiz Wall 2010), money that would fund Indigenous projects across the whole of the Kimberley region. But by the end of 2009 the mandate of the KLC (led by Wayne Bergmann) to secure the deal, which it supported, was challenged by a number of Traditional Owners. After 18 months of wrangling, and a Federal Court decision that removed a key Indigenous opposition figure - Joseph Roe - a Goolarabooloo Traditional Owner from legally representing Goolarabooloo interests, there was a vote in May 2011 where 60% (164-108 votes) of Jabirr Jabirr and Goolarabooloo Traditional Owners supported accepting the gas development.

Objectors continued to legally challenge the proposed development and in December 2011 the Supreme Court of Western Australia ruled that the State's attempt to compulsorily acquire land for the Browse LNG was invalid. Regardless, in 2012, the national Environmental Protection Authority and State Government gave environmental approval for the project. Finally, in April 2013, Woodside withdrew from the development and in August 2013 the Supreme Court of Western Australia blocked any further development of the Browse LNG plant at Walmadan (Wilderness Society 2013). By 2016, Woodside was developing a floating LNG hub to extract the gas from the Browse Basin off the coast of the Dampier Peninsula.

## Competing political narratives

Indigenous-environmental relations in these two case studies can be categorised into four competing political narratives, which are explored in turn.

## Indigenous advocates for economic development

In Cape York most controversy was around the declaration of the Wenlock Basin. Noel Pearson, an Indigenous activist and Director of the Cape York Institute, publically led opposition arguing that declaring Wenlock River a 'Wild River' made a proposed bauxite mine near Mapoon unfeasible, and that this would unfairly hinder Indigenous economic development (Neale 2011). Pearson described the Wild Rivers Act as a new wave of colonialism (Slater 2013), and argued that

The Wild Rivers Act strips Indigenous people of the right to determine and develop priorities and strategies for the development of their lands. Land and water and the right to 'speak for country' and to make decisions about country is at the core of Aboriginal tradition. (Pearson 2010, p. 7)

Pearson presented a simplified version of Cape York politics for the national audience, and was given significant publicity by The Australian newspaper and opposition politicians. He advocated large-scale industrial development to secure the future of Indigenous people, and that such development should directly benefit Indigenous communities.

In the Kimberley, Wayne Bergmann argued that environmental groups failed to understand the extent and urgency of the economic issues facing Indigenous people:

If you use the gas project as a case study, no one was here helping us. No environmental groups were helping us. Even now, even after we've done all the social awareness of our plight, they're still not knocking on our door to help us. All they are good at is criticising us. (Wayne Bergmann, KRED, Ex-Chair of KLC, Broome, interview)

Other members of the KLC also publically objected to the presence and involvement of environmentalists:

They've [environmental groups] cost us a lot in legal fees in their challenge... . Their approach to attack Indigenous people was the wrong approach, because we're the victims in this process and they should have supported us. (Anthony Watson, KLC, Jabirr Jabirr Traditional Owner, Broome, interview)

In both cases there were regional Indigenous leaders who advocated the pragmatic necessity of industrial development for the sake of Indigenous survival, and argued that environmental groups were preventing Indigenous economic autonomy. This approach focused on the need for large-scale development projects that should compensate Traditional Owners for their land, benefit all Indigenous communities and provide Indigenous employment. Indeed, in recent years Indigenous communities have negotiated better outcomes and significant gains from extractive industries (Doohan 2008, O'Faircheallaigh 2013).

## Environmental groups' vision of 'saving' the environment

TWS is the best example of a group seeking to 'save' the environment. Its campaign slogans, literature and imagery communicated a beautiful empty landscape that needed supporters' help to be 'saved' from a variety of destructive threats. In the mid-2000s, TWS had launched a new national programme called 'WildCountry' (Pickerill 2008), which aimed to connect and protect large-scale corridors of biodiversity across Australia. It was

founded in a belief that protecting small-disjointed pockets of land was insufficient to sustain a variety of environments and flora and fauna. Rather, species needed to be able to travel across and between landscapes, and this required incorporating a variety of environments (such as desert and bushland) along with landscape types they had historically protected (old growth forests and rivers).

Lyndon Schneiders, then Cape York and Far-North Australia Campaigner for TWS, argued that the term was intended to bridge 'wilderness' with the Indigenous concept of 'country';

that's why we dubbed it Wild Country – it was an attempt to keep the best of the idea and the movement of essentially the white folk that are supporting the stuff in southern Australia, at the same time recognising that in northern Australia there is no wilderness. (interview)

Wild Country mapped neatly into supporting the Wild Rivers Act, but consequently TWS was criticised for continuing to use language - 'wild' and 'wilderness' – that implied an absence of people from the environment.

TWS had an enduring interest in the Kimberley since the 1980s. Its' 'Save the Kimberley' campaign was primarily orchestrated from its State headquarters 1400 miles south in Perth, but they worked in conjunction with Environs Kimberley (EK). Its key campaign messages objected to the Browse LNG proposal because of the likely disruption to whale migration paths down the west of Dampier Peninsula, and the contribution that burning the extracted gas would make to climate change. TWS campaign literature was dominated by pictures of people-free landscapes and whales, often juxtaposed against images of industrial development in the Pilbara region (just south of the Kimberley and an international mining hub). TWS said little about Indigenous people or their rights, but did argue that the gas hub would have social impacts alongside the environmental ramifications:

We are a conservation organisation and we can see that this gas hub will have disastrous environment and social impacts, and as far as we're concerned we're obligated to oppose it. (Peter Robertson, Campaigns Co-ordinator of The Wilderness Society Western Australia, Perth, interview)

## Indigenous vision of a sustainable future

In Cape York there were Indigenous voices and groups supportive of the Wild Rivers Act (Skilton et al. 2014). A coalition of north Queensland Indigenous groups' opposed to Federal government plans to water down the Act argued 'Wild Rivers is supporting the proper Indigenous management of country including homelands-based initiatives and sustainable enterprise, and provides important employment, training and capacity



building opportunities for our people' (Claudie and Yanner 2010, no pagination).

Wild River contestations led to changing local and regional Indigenous political assemblages (Smith 2005a, Holmes 2011, Slater 2013). Traditional Owners located on the country in question found themselves in opposition to regional Indigenous organisations (such as Balkunu) about who had the right to speak on behalf of, look after and manage country. There were 'modernists, reformists, regions-focused visions of Indigenous futures, forcefully presented by Noel Pearson against more traditionalist, local-focused visions held by many community leaderships' (Holmes 2011, p. 54). These 'local-focused visions' often articulated a different economic vision for the region, one that involved economic development that maintained existing environmental conditions.

In the Kimberley, those Indigenous activists opposed to the Browse proposal, particularly members of the Goolarabooloo community, collaborated with some of the environmental organisations, especially TWS, EK and WWF, in developing alternative economic models for the region that would enable careful environmental management alongside sustainable economic futures. These plans, however, were often small-scale, in the early stages of development and in many ways employed a different conceptual interpretation of what the economy constituted - a focus on basic income provision and on-country jobs rather than a concern with GDP and export revenue (Strickland-Munro and Moore 2013). In 2005 EK had worked alongside the KLC and the Australian Conservation Foundation (ACF) in having a roundtable discussion in Fitzroy Crossing about developing alternative economic options particularly for Indigenous communities (Hill et al. 2005). The meeting produced 11 principles on how development should proceed in the Kimberley.

#### Environmental groups' negotiations and multi-scalar conversations

The final competing political narrative was the least visible. In Cape York, despite publically appearing to ignore Indigenous people, TWS had long worked with a variety of Indigenous activists. TWS had been heavily involved in a process of negotiation of environmental protection plans, along with the ACF and CAFNEC, with many Indigenous representatives and pastoralists. Together they signed the Cape York Heads of Agreement (1996), a groundbreaking formal agreement on how to environmentally manage Cape York, which by 2005 had fallen apart.

TWS learnt from the failure of the Cape York Heads of Agreement, shifted scales in its work with Indigenous groups, and built relations with many Traditional Owners. As Kerryn O'Conor, North Queensland Campaigner at TWS (Cairns) reflected,

talking to people on the ground, particularly at the Traditional Owner level, there's a lot of support for conservation outcomes, but when you draw back from that and you get involved in the more regional politics, that's when it starts getting murky and difficult. (interview)

There was recognition not just of the complexity of Indigenous politics in Cape York but that there was a division in Indigenous communities between those who lived on country and Indigenous organisations that claimed to represent regions. Of particular relevance to the Wild Rivers Act was the approach TWS took to land tenure and land rights. Moving away from their historic emphasis of securing the establishment of new National Parks, in Cape York TWS took a more flexible approach to land ownership which was 'not about trying to secure a particular area in the form of a protected area, it's about trying to put in place a management framework that allows particular land development to occur but doesn't allow other development to occur' (Kerryn O'Conor, interview). In other words, it mattered less to TWS who owned the land and more what development was permitted, and so Wild Rivers, which was not about land ownership but about excluding certain forms of development, fitted this new TWS approach.

EK is a Broome-based environmental group that since 1996 has been working on collaborative environmental campaigns with Traditional Owners and was a key driver of the James Price Point campaign. It began by opposing a project to introduce large-scale cotton farming in the Fitzroy valley and grew into organising a number of different campaigns, educational events and running natural and cultural resource management projects. It has always had strong ties to the Indigenous KLC and consequently it 'has been our ... priority to retain that publicly and we would never speak out against the KLC' (Kate Golson, Environs Kimberley, Broome, interview). The relationship with KLC became problematic as KLC supported the Browse LNG development:

it became clear to board members and the wider membership that EK was not advocating against the gas hub ... and it led to a breakaway group forming - EK members who wanted to see the organisation say 'no sorry our mission is this, it's different to KLC's. (Golson, interview)

For EK, navigating whom in the Indigenous communities to work with, especially in the context of their formal ties with KLC, was difficult. On the one hand, 'EK needs to talk with the TO's as much as it does to the KLC' (Golson, interview), yet:

We've continued to have meetings with the KLC and agreed to disagree on the gas ... we haven't actually come to support the Traditional Owners that don't want it, what we are doing is sticking to our position of opposing the gas hub. (Martin Pritchard, Environs Kimberley, Broome, interview)

Likewise EK balanced a focus on their group mission - protecting the environment - in their opposition to the gas hub, therefore they 'haven't worked on the Aboriginal heritage side of things' (Pritchard, interview), with publically recognising that Indigenous issues were implicit in the campaign:

If you look at the leaflet ... we have actually mentioned the cultural heritage, and there's a quote there from Joseph Roe [Goolarabooloo Traditional Owner] and that's the Lurujarri heritage trail. So we haven't actually not included information about cultural heritage. (Pritchard, interview)

While EK maintained their nuanced position publically, in practice several members became active and vital members of the 'No Gas' campaign. Other national environmental organisations took a different stance. WWF had long been involved in shaping the Browse LNG proposal, and working on a number of different, often small-scale, projects in a bid to develop alternative economic options:

We've been trying to guide how that development occurs ... and also to create a significant benefits package for Aboriginal people without using the James Price Point option as the lever around which those assistance packages would be deployed ... what we want to do is promote environmentally compatible development. (Paul Gamblin, WWF, Perth, interview)

Consequently, WWF did not assert direct opposition to the Browse LNG proposal but instead sought to help Indigenous activists secure the best deal they could for the environment and economically. Overall, many environmental groups put extended effort into collaborating with Indigenous groups in both regions and sought to operate across many scales.

## **Understanding black-green relations**

By examining these competing political narratives, it is possible to identify six characteristics of black-green relations in Australia. First, despite a media narrative of environmentalists and Indigenous activists being on opposing sides, there is not a simple opposition between Indigenous and environmental activists. Instead the multiple competing positions taken by Indigenous and environmental groups are made visible through this analysis. These relations are messy, negotiated and contingent. They pivot on contrasting values and multiple diverse interests and are expressed through particular modes of contestation.

Second, this complexity is evidence by a long history of black-green conversations, negotiations, collaborations, informal agreements and meetings where Indigenous and environmental activists have sought to navigate their differences and identify points of agreement. These conversations took place on multiple scales and were far more complex than the public narrative of southern-based and distant environmental organisations suggests (Christoff 2016). Having struggled to work at the regional scale with Cape York Heads of Agreement (1996), for example, TWS sought to work with Indigenous activists on scales that were self-determined, 'new scales of coexistence' (Howitt 2006, p. 64), where Indigenous concerns were not imposed from above, but neither reduced to the local.

The issue is not that these conversations had not taken place, but rather that there continues to be disagreement amongst Indigenous communities and their multiple leaderships as to who has the right to speak on behalf of the many different countries and the region. Eddie Barney (Chairman of Mossman Gorge Aboriginal Community, Mossman Gorge, interview) cautioned that environmentalists had to adhere to Indigenous protocols in order to speak with the right people, otherwise 'you will have [Indigenous] members who will pretty much speak on all and every issue but it doesn't work like that'. Yet as exemplified in the tensions between Noel Pearson and Traditional Owners, it remains unclear who is speaking on behalf of whom and therefore how many people must be consulted, as Nicky Hungerford (Campaigner, CAFNEC, Cairns, interview) notes 'you go to the Land Council and visit 18 mobs<sup>1</sup> and then all their clan groups', and yet might still be accused of not speaking to the right people.

In response to this complexity, environmental organisations sought to work with those who wanted to work with them (rather than necessarily secure agreement from all Indigenous people affected) and worked with 'middle people': 'There's usually someone in whichever community we work with who straddles both worlds. If you don't have that, I'd actually argue that cultural difference is so huge that it's almost impossible to have a deep working relationship' (Schneiders, interview). These cultural interpreters help environmentalists liaise with, and navigate the culture of, Indigenous people, and they have spent time, and built relationships of trust, with Indigenous people on country.

Third, environmental groups struggle to advocate for, and articulate, a peopled-landscape. Too often environmental campaigns made no mention of how people fitted into the environment. TWS used empty landscape pictures and campaign literature that failed to mention the existence of people, let alone Traditional Owners. This approach contradicts Indigenous belief that: 'the way to look after country is not by keeping Indigenous people off it, but to allow them to go back and interact with that country so that proper biodiversity is maintained' (Arnold Wallis, Chairperson of the Wuthathi Tribal Council and ex-ACF Indigenous Liaison Officer, Cairns, interview). However, environmentalists who spent extended time in these regions - Cape York or the Kimberley - did begin to problematise the

notion of an 'untouched' landscape and were affected by Indigenous ontologies.

Fourth, funding matters. How the different activist groups are funded shapes how they campaign. TWS is reliant upon a supporter base that it subsequently has to attract, appease and retain:

Aboriginal people are becoming more aware of what political clout they actually have now in Australia, through legislation and the different acts I think that's attracted more resources ... whereas volunteer organisations still have to go out in the koala bear suits with their bucket every Friday night. (Cliff Cobbo, Aboriginal Land Management Facilitator, Burdekin Dry Tropics Board, Townsville, interview)

Other conservation organisations, such as the Australian Wildlife Conservancy, which establish protective sanctuaries by purchasing land, rely more on large philanthropic donations that reduce their need to respond to membership demands. The WWF accepts corporate sponsorship. Yet activist campaign organisations are usually underfunded and financially fragile and ultimately funding and money can challenge and shape the intentions of all involved in these campaigns.

Fifth, Indigenous activists use anti-environmental rhetoric to promote particular types of economic solutions. The debate often became crystallised into a binary between the environment and the economy, yet actually the contention was more accurately about what form and type of economy was appropriate and sustainable in these regions. Finally, there was often evidence of a lack of trust between Indigenous and environmental groups. These relationships take considerable time to build, what Sweeney notes as 'a three T formula for working with Aboriginal people . . . Talk, Time and Trust and you only get the third by the combination of the first two' (Dave Sweeney, Nuclear Campaigner, ACF, Melbourne, interview). Indeed the notion of what trust meant was unclear. While trust might entail an expectation of continued alliance and support, it could mean a looser sense of mutual respect and active listening.

## Moving forward

From the analysis of these case studies, it is possible to suggest three potential ways forward in black-green relations in Australia. First, environmentalists need to articulate the inseparability of environment and people, that people are an inherent part of the environment, just like other animals, and therefore that it is futile to seek to protect an 'untouched' environment. This is because, as Indigenous people have long argued, the environment is a lived, lived-in and dynamic space. The environment and culture are inseparable because they co-constitute each other. All forms of the environment have in some way been transformed by humans. As Soper (1999, p. 56) argues, 'much of which ecologists loosely refer to as "natural" is indeed a product of culture, both in the physical sense and in the sense that perceptions of its beauties and value are culturally shaped'. To accept that the environment must include people would aid the development of more flexible and inclusive environmentalist ontologies and enable more environmentalists to incorporate social justice issues in their campaigns.

Second, it is necessary for environmentalists to be open about their Indigenous liaison work. Environmental organisations are reticent to advertise their efforts at collaboration with Indigenous groups precisely because environmentalists understand the dangers of being perceived to 'use' Indigenous people to their advantage. Instead, environmental groups who have done considerable work with Indigenous activists are careful to ensure that they do not claim to speak on their behalf, that they are not perceived as seeking to co-opt them, and that they are not assuming their support. Rather, environmentalists have been quite careful in how they have portrayed themselves as standing-alongside or supporting Indigenous activists. In the Walmadan case, TWS was clearly supportive of Indigenous Traditional Owners such as Joseph Roe and Richard Hunter, but were always clear that they were 'working-with' and 'shared support for' Indigenous ideas. This is a fine line to walk, but a necessary balance that created space for both Indigenous and environmental autonomy within the campaign.

The question remains whether environmental organisations in Australia should enhance their relationships with Indigenous communities, to counter the inaccurate myths and stereotypes about Indigenous people, and to publicise their on-going negotiations and relationships. While publicity would help counter the dominant stereotypes of Indigenous people and quash the many accusations of environmental groups being blind to issues of indigeneity, it would likely muddy the political waters by diluting the environmental protection message and risk accusations of co-option by Indigenous activists. Organisations such as the Indigenous Environmental Foundation therefore argue that environmentalists should concentrate on supporting already-existing Indigenous initiatives, such as Land and Sea management Centres and should openly lobby support for Indigenous initiatives (IEP 2008):

The environment movement was naively, or ignorantly, utilising that power imbalance ... to lever outcomes that weren't in the interests of the Indigenous people ... what they need to do is simply support Indigenous environment initiatives.... Assign your people into the Aboriginal organisations to work for them. (Michael Winer, Chief Executive Officer and one of the founders of Indigenous Enterprise Partnerships, Cairns, interview)

Third, a much more nuanced and complex discussion is required about economic opportunities. While extractive industries have in recent years improved the benefits they offer Indigenous communities, they are unlikely to be an economic panacea (Mills 2011, O'Faircheallaigh 2013). While cautious of placing any more burden upon Indigenous activists and not suggesting that they have any particular responsibility to work differently with environmental groups, it is necessary to move beyond the dualism of environment or economy. As Anthony Esposito, National Manager - Indigenous Conservation Program, TWS, argued, 'what we need is more development in the economic sphere so that we can prove that there is a different development pathway' (Brisbane, interview). While not disregarding the economic benefits of natural resource extraction, more needs to be done to support notions of 'hybrid' Indigenous economies that work for the Indigenous communities involved, are regionally and climatically appropriate, and are able to produce livelihoods (Altman 2012). Environmental groups have begun to take seriously the need to tackle economic issues as part of environmental concerns. TWS is developing a conservation economy approach that uses eco-tourism, ecosystem services and carbon management as sources of alternative income. But much broader discussion needs to take place about a variety of economic types and possibilities.

#### **Conclusions**

There is no simple black-green division. The issue, for environmental politics, is the extent to which current perceptions that environmental organisations do not value Indigenous concerns are risking the effectiveness of environmental groups. Such a perception did limit TWS effectiveness in maintaining the Wild Rivers Act in Queensland but, perhaps learning from such encounters, they were more successful in articulating their collaboration with Traditional Owners in the Kimberley in the later stages of their campaign; learning how to articulate the complexity of Indigenous environmental relations to an audience (supporters, politicians and media) who thrive on sound bites and simplicity is never going to be easy.

While long-term stable collaborations have proved difficult to sustain, both Indigenous activists and environmental groups are developing better understandings of what might be possible. Tuck and Yang (2012) suggest that decolonisation is so fundamentally unsettling of settler ontologies and epistemologies that only fleeting temporal moments of alliance - what they call 'strategic and contingent collaboration' (p. 28) - are likely (also see Muller 2014). As the social and environmental landscape of Australia continues to change, it is necessary for environmental groups to reflect on how they navigate and articulate their alliances with Indigenous people, and



how Indigenous groups navigate and articulate their alliances with environmentalists (Foley 2000). Otherwise, a rhetoric of black versus green, of environment versus economy, and of green colonialism versus Indigenous autonomy will problematically continue.

#### Note

1. The term 'mob' is Australian slang for a group of people (often friends or family).

## **Acknowledgements**

This research was undertaken with funding provided by The British Academy (SG-38399 and SG-090380). Thanks are due especially to the generosity of all the interviewees. I am also grateful for space, facilities and intellectual support provided by the School of Indigenous Australian Studies at James Cook University (Townsville and Cairns). This work has also been much improved through constructive comments by staff at seminars at Flinders University, University of Western Sydney, University of Melbourne and Deakin University.

#### Disclosure statement

No potential conflict of interest was reported by the author.

## **Funding**

This work was supported by the British Academy [SG-38399 and SG-090380].

#### **ORCID**

Jenny Pickerill http://orcid.org/0000-0002-2070-705X

#### References

Adams, W.M. and Milligan, M., 2003. Introduction. In: W.M. Adams and M. Mulligan, eds. Decolonizing nature: strategies for conservation in a post-colonial era. London: Earthscan, 1-16.

Altman, J., 2012. Indigenous futures on country. In: J. Altman and S. Kerins, eds. People on country: vital landscapes, indigenous futures. Annandale, NSW: The Federation Press.

Altman, J.C., 2010. Wild rivers and informed consent on Cape York. Centre for Aboriginal Economic Policy Research. Available from: http://caepr.cass.anu.edu. au/sites/default/files/docs/Topical\_Altman\_WildRivers\_Rev\_0.pdf



- Barbour, W. and Schlesinger, C., 2012. Who's the boss? Post-colonialism, ecological research and conservation management on Australian Indigenous lands. Ecological Management & Restoration, 13 (1), 36-41. doi:10.1111/j.1442-8903.2011.00632.x
- Bawaka Country, et al., 2013. Caring as Country: towards an ontology of cobecoming in natural resource management. Asia Pacific Viewpoint, 54 (2), 185-197. doi:10.1111/apv.12018
- Bishop, J., et al., 2013. The resources boom and the Australian economy: a sectoral analysis'. RBA Bulletin, 3, 39-50.
- Black, C.F., 2011. The land is the source of the law: A dialogic encounter with indigenous jurisprudence. London: Routledge.
- Brueckner, M., et al., 2014. The civic virtue of developmentalism: on the mining industry's political licence to develop Western Australia. Impact Assessment and Project Appraisal, 32 (4), 315-326. doi:10.1080/14615517.2014.929784
- Cape York Heads of Agreement. 1996. Cairns: Cape York Land Council.
- Christoff, P., 2016. Renegotiating nature in the anthropocene: Australia's environment movement in a time of crisis. Environmental Politics, 25 (6), 1034-1057. doi:10.1080/09644016.2016.1200253
- Claudie, D. and Yanner, M., 2010. North Queensland Indigenous groups reject Abbott's intervention on Wild Rivers, media release 29 September. Far North Queensland: Chuulangun Aboriginal Corporation Girringun Aboriginal Corporation, Wik projects and Carpentaria Land Council Aboriginal Corporation.
- Doohan, K., 2008. Making things come good: relations between Aborigines and miners at Argyle. Broome: Backroom Press.
- Espig, M. and de Rijke, K., 2016. Unconventional gas developments and the politics of risk and knowledge in Australia. Energy Research & Social Science, 20, 82-90. doi:10.1016/j.erss.2016.06.001
- Foley, G., 2000. Whiteness and Blackness in the Koori struggle for self-determination: strategic considerations in the struggle for social justice for Indigenous people. Just Policy: A Journal of Australian Social Policy, 19 (20), 74-88.
- Ganter, R., Martinez, J., and Lee, G., 2006. Mixed relations: Asian-Aboriginal contact in north Australia. Perth: UWA Publishing.
- Haslam Mckenzie, F., 2013. Delivering enduring benefits from a gas development: governance and planning challenges in remote Western Australia. Australian Geographer, 44 (3), 341-358. doi:10.1080/00049182.2013.817032
- Hill, R., et al., 2005. Kimberley Appropriate Economies Roundtable Forum Proceedings. 11-13 October Fitzroy Crossing. KLV: Environs Kimberley and ACF, QLD
- Hodgkinson, J.H., Hobday, A.J., and Pinkard, E.A., 2014. Climate adaptation in Australia's resource-extraction industries: ready or not? Regional Environmental Change, 14 (4), 1663–1678. doi:10.1007/s10113-014-0618-8
- Holmes, J., 2011. Contesting the future of Cape York Peninsula. Australian Geographer, 42, 53-68. doi:10.1080/00049182.2011.546319
- Howitt, R., 2006. Scales of coexistence: tackling the tension between legal and cultural landscapes in post-mabo Australia. Macquarie Law Journal, 6, 49-64.
- Howitt, R. and McLean, J., 2015. Towards closure? Coexistence, remoteness and righteousness in Indigenous policy in Australia. Australian Geographer, 46 (2). doi:10.1080/00049182.2015.1020992
- IEP, 2008. The Wilderness Society are not welcome on Cape York Peninsula. Indigenous Environment Foundation. Available from: www.myspace.com/ iefyouth [Accessed 19 February 2008].



- Jackson, S., 1995. The water is not empty: cross-cultural issues in conceptualising sea space. Australian Geographer, 26 (1), 87-96. doi:10.1080/00049189508703133
- Kimberley Law and Culture Centre, 2006. New legend: a story of Law and culture and the fight for self-determination in the Kimberley. Kimberley: Law and Culture Centre.
- Land, C., 2015. Decolonizing solidarity: dilemmas and directions for supporters of Indigenous struggles. London: Zed Books.
- Lane, R., 2004. Irrigated agriculture and place-making in the East Kimberley. Australian Geographer, 35 (1), 77-94. doi:10.1080/0004918024000193739
- Langton, M., Ma Rhea, Z., and Palmer, L., 2005. Community-oriented protected areas for Indigenous peoples and local communities. Journal of Political Ecology, 12, 23-50. doi:10.2458/jpe.v12i1
- Laurie, V., 2010. The Kimberley: Australia's last great wilderness. Perth: UWA Publishing. Marks, K., 2007. The battle for Cape York. The Independent, 16 (October), 22-23.
- McLean, J., 2012. From Dispossession to Compensation: a political ecology of the Ord Final Agreement as a partial success story for Indigenous traditional owners. Australian Geographer, 43 (4), 339-355. doi:10.1080/00049182.2012.731298
- McLean, J., 2014. Still colonising the Ord River, northern Australia: a postcolonial geography of the spaces between Indigenous people's and settlers' interests. The Geographical Journal, 3, 198-210. doi:10.1111/geoj.12025
- Measham, T.G., et al., 2013. An expanded role for the mining sector in Australian society? Rural Society, 22 (2), 184-194. doi:10.5172/rsj.2013.22.2.184
- Mills, S.E., 2011. Beyond the blue and green: the need to consider aboriginal peoples' relationships to resource development in labor-environment campaigns. Labor Studies Journal, 36 (1), 104-121. doi:10.1177/0160449X10392527
- Moorcroft, H. and Adams, M., 2014. Emerging geographies of conservation and Indigenous land in Australia. Australian Geographer, 45 (4), 485-504. doi:10.1080/00049182.2014.953733
- Muir, K., 2012. Politics, protest and performativity: the Broome community's 'No Gas on the Kimberley Coast' campaign. Australian Humanities Review, 53, 11.
- Muller, S., 2003. Towards decolonisation of Australia's protected area management: the Nantawarrina Indigenous protected area experience. Australian Geographical Studies, 41 (1), 29-43. doi:10.1111/ages.2003.41.issue-1
- Muller, S., 2014. Co-motion: making space to care for country. Geoforum, 54, 132– 141. doi:10.1016/j.geoforum.2014.04.011
- Neale, T., 2011. Duplicity of meaning: wildness, indigeneity and recognition in the Wild Rivers Act debate. Griffith Law Review, 20 (2), 310-332. doi:10.1080/ 10383441.2011.10854700
- O'Faircheallaigh, C., 2013. Extractive industries and Indigenous peoples: A changing dynamic? Journal of Rural Studies, 30, 20-30. doi:10.1016/j.jrurstud.2012.11.003
- Ockwell, D. and Rydin, Y., 2006. Conflicting discourses of knowledge: understanding the policy adoption of pro-burning knowledge claims in Cape York Peninsula, Australia. Environmental Politics, 15 (3), 379-398. doi:10.1080/09644010600627659
- Pearson, N., 2010. Submission to the Inquiry into the Wild Rivers (Environmental Management) Bill 2010 [2]. Canberra: Senate Legal and Constitutional Affairs Committee Federal Parliament.
- Pickerill, J., 2008. From wilderness to WildCountry: the power of language in environmental campaigns in Australia. Environmental Politics, 17 (1), 93-102. doi:10.1080/09644010701811681



- Poirer, R. and Ostergren, D., 2002. Evicting people from nature: indigenous land rights and national parks in Australia, Russia, and the United States. Natural Resources Journal, 42, 331-351.
- Prior, T., et al., 2012. Resource depletion, peak minerals and the implications for sustainable resource management. Global Environmental Change, 22 (3), 577-587. doi:10.1016/j.gloenvcha.2011.08.009
- Regional Planning Interests Ac. 2014. Department of Agriculture and Fisheries. Available from: https://www.legislation.qld.gov.au/view/html/inforce/current/act-2014-011
- Ritter, D., 2014. Black and green revisited: understanding the relationship between Indigenous and environmental political formations. Land, Rights, Laws: Issues of Native Title, 6 (2), 1-11. AIATSIS, Canberra.
- Rose, D.B., 2004. Reports from a Wild Country: ethics for decolonisation. Sydney: University of New South Wales Press.
- Ruiz Wall, D., 2010. Development, cultural management and traditional owners: the LNG development proposal at James Price Point in the Kimberley. Platform: Journal of Media and Communication, Available from: www.platformjnc.com.
- Schandl, H. and West, J., 2012. Material flows and material productivity in China, Australia, and Japan. Journal of Industrial Ecology, 16 (3), 352-364. doi:10.1111/ j.1530-9290.2011.00420.x
- Schneiders, L., 2006. Cape York: protecting one of the last great wild places on earth. Wilderness News, 169 (Winter), 6.
- Skilton, N., Adams, M., and Gibbs, L., 2014. Conflict in common: heritagemaking in Cape York. Australian Geographer, 45 (2), 147-166. doi:10.1080/ 00049182.2014.899026
- Slater, L., 2013. 'Wild Rivers, Wild Ideas': emerging political ecologies of Cape York wild rivers. Environment and Planning D, 31 (5), 763-778. doi:10.1068/d3012
- Smith, B., 2005a. 'We got our own management': local knowledge, government and development in Cape York Peninsula. Australian Aboriginal Studies, 2, 4-15.
- Smith, B., 2005b. Culture, change and the ambigious resionance of tradition in Central Cape York Peninsula. In: L. Taylor, G.K. Ward, G. Henderson, R. Davis, and L.A. Wallis, eds. The power of knowledge, the resonance of tradition. Canberra: Aboriginal Studies Press, 223-235.
- Smith, R., 2012. Wild rivers, wild accusations wild law in the Cape York wilderness. International Journal of Liability and Scientific Enquiry, 5, 1. doi:10.1504/ IJLSE.2012.045527
- Soper, K., 1999. The politics of nature: reflections on hedonism, progress and ecology. Capitalism Nature Socialism, 10 (2), 42-70. doi:10.1080/10455759909358857
- Stephenson, M.A. and Hunter, T., 2014. Resource developments on Indigenous lands in Australia: the James Price point gas precinct. In: N. Irina and C. Stückelberger, eds. Mining ethics and sustainability: papers from the World Mining Conference 2013. Geneva, Switzerland: Globethics.net Publications, 121-142.
- Strickland-Munro, J. and Moore, S., 2013. Indigenous involvement and benefits from tourism in protected areas: a study of Purnululu National Park and Warmun Community, Australia. Journal of Sustainable Tourism, 21 (1), 26-41. doi:10.1080/09669582.2012.680466
- Tuck, E. and Yang, K.W., 2012. Decolonization is not a metaphor. Decolonization: *Indigeneity, Education & Society,* 1 (1), 1−40.
- Vincent, E. and Neale, T., 2016. Unstable relations: indigenous people and environmentalism in contemporary Australia. Crawley: UWA Publishing.



Vincent, E. and Neale, T., 2017. Unstable relations: a critical appraisal of indigeneity and environmentalism in contemporary Australia. The Australian Journal of Anthropology, 28 (3), 301-323. doi:10.1111/taja.12186

Wilderness Society. 2013. Victory for Australia's nature: WA supreme court rules James Price Point approval 'illegal'. The Wilderness Society. Available from: https://www.wilderness.org.au/articles/victory-australia's-nature-wa-supremecourt-rules-james-price-point-approval-'illegal' [Accessed 04 February 2016].