AUSTRALIAN INSTITUTE OF ADMINISTRATIVE LAW NEWSLETTER

GPO Box 1927, Canberra City ACT 2601 No. 1 1989

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The Institute is in the process of applying for incorporation under the Associations Incorporation Act 1953 (ACT). Its objects are:

(a) to promote knowledge of and interest in administrative law;

(b) to provide a forum for the exchange of information and opinions on aspects of administrative law and practices among persons involved in, affected by, or interested in, administrative law or administrative practice;

(c) to disseminate information about administrative law and, in particular, current developments in administrative law;

(d) to publish and encourage the publication of papers, articles and commentaries about administrative law;

(e) to promote lectures, seminars and conferences about administrative law;

(f) to make and disseminate reports, commentaries and submissions on aspects of administrative law and administrative practices; and

(g) to cooperate with institutions of academic learning, and with other persons having an interest in administrative law or administrative practices, in promoting the objects referred to in paragraphs (a) to (f)

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NOTE FROM THE EDITOR

Persons interested in submitting contributions to the Newsletter should forward their contribution to Mr A Anforth, PO Box 337, Civic Square, 2608 and should preferably be no more than three typed A4 pages.

From The President

I am very pleased to be able to report that the Institute has got off to a good start and our membership has grown rapidly as appears from the list of members included in this newsletter. Our first activity was a well attended meeting held on 30 August at which Jeffrey Lubbers, the Director of Research of the Administrative Law Conference of the United States, gave a very interesting talk on the system of federal courts and tribunals in the USA.

The Executive are now planning future activities. Consideration is being given to holding a seminar on the proposed new ACT legislation relating to planning appeals. We are also investigating the possibility of sponsoring a seminar in Queensland to discuss the implementation of (or the failure to implement) the Fitzgerald Report recommendations concerning administrative law reforms in Queensland. The Executive are also contemplating the publication of books, or a series of books, on administrative law and two proposals are already being considered.

If members have any suggestions as to future activities we would be glad to consider them.

There is, I think, a clear need for a body such as the Institute. Although several of the developments that have occurred in recent years in the federal arena are being adopted in some of the States, at the same time the federal institutions have been the subject of ill-informed criticism and a more insidious attack by being starved of adequate resources to carry out their statutory functions. Also recent suggestions that the availability of increased resources should depend on "productivity increases" are causing considerable concern and must be strongly resisted.

I expect that in future this newsletter will be issued on a regular basis and will prove to be of interest to all members. I take the opportunity of thanking Allan Anforth for undertaking the editorial task and I hope that contributions to future issues will be forthcoming from a substantial number of members.

Geoff Kolts

Our Beginning : An Historical Footnote

The quiet, palm lined lobby of the Hyatt Hotel, Canberra - scene of many a political and business coup - was the appropriate setting for the decision to seek the establishment of an Australian Institute of Administrative Law. The date was not quite so felicitous - April Fools Day, 1989.

Circumstances were as follows. Earlier that morning the question had arisen at an ACT Law Society seminar of what might be done to give the so-called "New Administrative Law" some form of broad-based, non-partisan institutional support. I, for my sins, happened to be the one who first articulated the obvious answer - so I really had no excuses to offer when Dr John Griffiths (of ex-ARC fame, now of Blake Dawson Waldron), and AAT Deputy President Robert Todd, button holed me in the Hyatt lobby and suggested I might "put some effort where my mouth was".

Surprisingly, little effort was needed. I wrote to a few colleagues, who in turn wrote to others. The patent need for an institute of the type we have now established soon meant that help literally "fell from the clouds". It would be invidious to name the firms, individuals and institutions who offered time and effort to the idea, but by 3 May 1989 we were able to muster a very respectable meeting of those interested in the creation of an institute. For the record, the meeting included four past, present or exacting Commonwealth Ombudsmen, three Professors specialising in administrative law, two members of the AAT, the Presidents of both the Australian Law Reform Commission and the Administrative Review Council, plus a

plethora of experts, activists, archivists - and perhaps the odd healthy anarchist.

At that first meeting those present supported a call by Robert Todd (who chaired the initial meetings leading to formation) that the proposed institute should not be a "lobbying" group; should not be confirmed to lawyers; and should not be just a 'Canberra' group.

The rest was downhill driving. Geoff Kolts (who was in one of his previous incarnations, First Parliamentary Counsel to the Commonwealth) dusted off his drafting skills and put together a set of rules, and on the evening of 5 July 1989 the Institute was voted into existence in the ARC Conference Room, Canberra.

Even as we clinked champagne glasses in quiet celebration, I think many of us were already thinking of the Institute's next obvious objective - the need to build firm bridges between the disparate classes of practitioners who play their different but equally vital roles in the administration of administrative law.

Derek Emerson-Elliott, AIAL Secretary
a Canberra barrister

On Being Reasonably Judicial

It is said from time to time that the AAT is "too judicial".

A number of things can be said about this. It is not clear what is wrong with being "judicial", unless that word is used in some pejorative sense. If it is, that is very sad, because in many ways it is the determination of judges to be judicial that has, down the ages, been the greatest preserver of our liberties. Witness the problems in recent times in other countries, in which governments have sought to prevent judges from continuing to be judicial. When Dick the Butcher in Henry VI Part II said to Jack Cade the rebel: "First thing we do, lets kill all the lawyers", he was not, as is generally supposed, venting a notion of community spleen against the legal profession generally. He was expressing the known fact that a would-be dictator must, as a priority, stop the law being applied judicially.

This apart, it is necessary to note some significant points about the Administrative Appeals Tribunal ("AAT"). It is a creature of the Act under which it lives and functions. I can do no better than quote what Allan Hall said in his paper "A Fresh Approach to Dispute Resolution - Part I" (1981) 12 FLR 71 at 78:

> "...Although characterised as an administrative Tribunal, the business of the Tribunal in its practical operation involves the resolution of disputes between a citizen and the administration. To enable it to discharge that function effectively, the Administrative Appeals Tribunal Act confers upon the Tribunal many of the trappings of judicial power. The requirements for hearings in public (section 35); the right to representation of a party in a proceeding before the Tribunal (section 32); the right to an opportunity to present one's case and make submissions (section 3); the power to take evidence on oath or affirmation, to proceed in the absence of a party who has had reasonable notice of the proceeding and to adjourn the proceeding from time to time (section 40) all point inescapably to a judicial model. In the discharge of its functions the Tribunal is thus required to act with judicial detachment and fairness or, in other words, according to the requirements of natural justice. But as was held in Drake v. Minister for Immigration and Ethnic Affairs (1979) 2 ALD 60 the Tribunal is not thereby exercising any part of the judicial power of the Commonwealth."

It is thus out of the question for the AAT to conduct its ultimate disposition of the cases that come before it by some informal conference procedure. Still less can it decide a matter "from the file", or "over the desk" or however it is put. Even if it could, such a mode of consideration would in my opinion offer no significant advance over the consideration of the matter by a fair minded and diligent public servant. It is only by openness and mutual exposure, to the other party and to the Tribunal, of the facts and arguments which each party wishes to have considered that justice can truly be done. If this is to be characterised as an "adversary" procedure then so be it, let the cap fit. As far as I am concerned it is only thus that each party, private citizen, corporation or from government, gets a truly fair go. And, incidentally, it is by this procedure that the Tribunal can most readily gain the inspiration, and the opportunity, to give the matter its own consideration and to draw the

attention of the parties to points or arguments that have not been made, or to areas of fact that have not been brought out. This is the area of an AAT member's responsibilities that has elements of an inquisitorial procedure, which when blended with the common law concept of natural justice requiring that these matters be drawn to the attention of the parties, has sometimes led a party to a victory not fought on a chosen battlefield. Most commonly, that party has been an unrepresented applicant.

Another fact that should be mentioned is that in the debate over whether the AAT is "too judicial" etc, it should be remembered that we are in any event talking about some 20 per cent of the cases that come to the AAT. The remaining 80 per cent are disposed of after conferences, commonly called "preliminary" conferences, that are truly informal by any criterion.

R.K. Todd
Deputy President AAT

Senate Inquiry Into The Cost Of Justice

The Senate Standing Committee on Legal and Constitutional Affairs is currently conducting an Inquiry into the Cost of Justice in Australia. This inquiry includes the cost of administrative justice.

A very interesting perspective on the cost of justice was recently given by the Chief Justice of the High Court, Sir Anthony Mason in his ACT Law Society Blackburn Lecture extracts from which appear in August 1989 Administrative Review 66.

Submission to this Inquiry should be lodged with the Secretary of the Committee by 1 December 1989.

A. Anforth
Editor

Administrative and Judicial Review In NSW

New South Wales has recently taken a further step towards the implementation of a rationalised administrative law package with the enactment of Freedom of Information legislation. This legislation supplements the existing Ombudsmans Act.

Enquiries of the NSW Cabinet Office reveal however that the mooted Administrative Appeals Tribunal legislation is still very much in the preliminary stages and a Bill should not be expected in the foreseeable future. There is still no commitment to judicial review legislation.

Allan Anforth
Editor

United States Administrative Law

The first public meeting of the Institute, held in Canberra on 30 August 1989, was addressed by Jeffrey Lubbers, the Director of Research of the Administrative Conference of the United States. The Conference serves a similar role to that of the Commonwealth's Administrative Review Council, conducting a continuing review of the Federal system for administrative review and appeals and making recommendations for change. The focus of Mr Lubbers' talk was to describe the framework of the US system of administrative law, with particular emphasis being given to a discussion of the function and status of Administrative Law Judges. The following statistics regarding the US Federal system of administrative law are taken from the papers he distributed at that talk.

Federal Adjudicators In The United States

Article III Courts (lifetime tenure, no reduction in salary)

US Supreme Court (9 Justices) 5250 filings, 170 opinions/arguments

U.S. Courts of Appeals (152 judges in the 11 circuits) 37,524 filings, 19,178 terminated on merits (1/2 after oral argument; 1/2 after briefs only) 17 *en banc* opinions

Court of Appeals for the Federal Circuit (16 judges) 1,296 filings (Court of International Trade, Boards of Contract Appeals, Patent and Trademark Office)

U.S. District Courts (94 districts, 575 judges) 239,634 civil filings (69,076 U.S. government cases; 170,558 private cases). Most frequent government case: Social Security 13,976. Most frequent private cases: contract cases 40,000; prisoner petitions 39,000; personal injury/product liability 31,000; civil rights 21,000. 43,508 criminal filings (18.7% of criminal defendants not convicted)

Magistrates (attached to U.S. District Courts, 294 full-time, 167 part time) 90,000 cases, mostly petty offenses. Also handle many other preliminary matters.

Bankruptcy Judges (293 judges) 594,567 filings

Court of International Trade (15 judges, 1,118 filings)

Article I Courts (limited terms)

U.S. Claims Court (18 judges) 763 filings

U.S. Court of Military Appeals (3 judges)

U.S. Tax Court (27 judges, 15 special trial judges) 42,000 filings in 1984)

Court of Veterans Appeals (3-7 judges) new court, created in 1989

Administrative Agencies

Located within agencies (including deparments) are also Administrative Law Judges (or examiners), and other legally qualified hearing /adjudicative hearings under the Administrative Procedure Act, although their decisions are subject to review by the agency. The following two tables list firstly, the number of Administrative Law Judges in 1984 and the cases filed with them in a one year period in either 1982 or 1983 and secondly, the number of hearing officers in 1986.

Administrative Law Judges	ALJs	CASES FILED
Agriculture, Department of	5	250
Alcohol, Tobacco & Firearms Bureau (Department of Treasury)	1	107
Civil Aeronautics Board	4	43
Commerce, Department of	1	107
Commodity Futures Trading Commission	4	858
Consumer Products Safety Commission	0	(a)
Drug Enforcement Administration (Department of Justice)	1	47
Environment Protection Agency	6	340
Federal Communications Commission	12	246
Federal Energy Regulatory Commission	21	109
Federal Labor Relations Authority	11	746
Federal Maritime Commission	6	163
Federal Mine Safety and Health Review Commission	12	1,284
Federal Trade Commission	8	7
Food and Drug Administration (Department of H.H.S.)	1	1
Housing and Urban Development, Department of	1	37
Interior, Department of the	9	500
Interstate Commerce Commission	10	77
Labor, Department of	84	14,457
Merit Systems Protection Board	3	182
National Labor Relations Board	107	4,961

National Transportation Safety Board	5	542
Nuclear Regulatory Commission	3	14
Occupational Safety and Health Review Commission	22	1,325
Securities and Exchange Commission	6	92
Small Business Administration	1	7
Social Security Administration (Department of H.H.S.)	760	363,533
U.S. Coast Guard (Department of Transportation)	11	605
U.S. International Trade Commission	2	9
U.S. Postal Service	4	477
TOTALS	1,121	391,108

Hearing Officers

Agriculture (contract appeals)	5
Commerce (Trademarks and patents)	23
Defense (contracts, industrial security clearance, civilian health and schools)	91
Education	29
Energy (contracts, licensing and financial assistance)	15
Health and Human Services (grants and social security)	25
Interior (contracts and land)	15
Justices (Immigration)	66
Labor (benefits, compensation, wages)	14
State (foreign service grievance and appeals)	29 (many part-time)
Transportation (contracts)	4
Environmental Protection Agency	2
Equal Employment Opportunity Comm.	83
Federal Communications Commission	3
Federal Labor Relations Agency	15
General Services Administration	11
Interstate Commerce Commission	9
Merit Systems Protection Board	77
National Aeronautics and Space	3
Nuclear Regulatory Commission	22
Postal Services (contracts)	4
Small Business Administration	6
Veterans Administration	71

PERSONALIA

Allan Anforth is the Editor of the Newsletter.

Allan is a solicitor with the Welfare Rights & Legal Centre in Canberra which is a free community legal centre practising in Social Security, Workers Compensation, Superannuation, Austudy, Private and Public Tennancy Law, Debt and Consumer Credit.

Prior to this position, Allan was a solicitor in private practice and with the Federal Government. Allan's interests include philosophy, theology, physics and golf when time permits.

When Should Rules Be Made In Primary, Rather Than Subordinate, Legislation

(The following is the text of a short address given to a Conference on Rule-Making recently held by the Administrative Review Council)

Whether a particular matter should be dealt with by an Act or by regulations or other subordinate instruments under the Act is a question about which in theory some general principles can be enunciated. However, I wonder at the usefulness of undertaking this task since exceptions will frequently need to be made to the principles. Bearing in mind that qualification, it seems to me that the answer turns on whether the matter is one of substance or procedure and, if a procedural matter, the importance of the matter in the scheme of the legislation.

Take, for example, a procedural matter such as how an application should be made to a government authority or tribunal. If it is ancillary to a legislative scheme, it is reasonable that it should be left to be dealt with by regulation. But if the whole legislative scheme relates to matters of procedure, then of course the procedural questions take on the colour of questions of substance. Thus, liability to extradition is a subject that relates in large part to the procedures to be followed to extradite an alleged fugitive and it follows that the Act itself needs to deal expressly with those procedures. This is particularly important because individual liberty is what is being legislated about. Another Act in the same vein is the Migration Act, which deals in part with procedures relating to deportation of illegal immigrants. In these cases the procedural matters are themselves major questions of policy and should be dealt with in the primary legislation.

In Australia, the policy to be given legislative effect is decided by the Cabinet. Ordinarily a written submission by the responsible Minister is made to the Cabinet. The view has been taken that the Federal Cabinet should be asked to deal only with the broad policy issues and not with the detail. The basis of this view is that the broad propositions of policy will appear in the Act, or at least, the legal rules required to give effect to those propositions will appear in the Act, and that matters of detail will be decided by the relevant Minister and may appear either in the Act or the regulations.

Although there have been cases in the past where an Act has done little else but authorise the making of regulations, the general practice in Australia today is that, except where as I have mentioned the procedural matters are part of the major matters of policy, those matters are often left to regulations, whereas substantive matters are always dealt with in the Act. For example, rules as to the time for making applications to tribunals or for lodging documents and the matters to be included in documents might well be regarded as appropriate for inclusion in subordinate legislation. Yet matters of these kinds are often included in primary legislation because of their importance in the scheme of the legislation.

Consider the provisions of the Corporations Act relating to offers to acquire shares. Section 750 specifies in great detail the particulars to be included in Part A, B, C & D statements relating to takeover offers and announcements. These are particulars of matters that it is considered shareholders should know in order to make informed decisions as to whether or not to accept offers made to acquire their shares.

Another example is the provisions of the Companies Codes relating to prospectuses, which even specify the size of type to be used in a prospectus. This requirement is important; otherwise a fly by night company that wishes to borrow from the public might well include in very small type information that it is required to specify in the prospectus but which, if too legible, might deter prospective subscribers from investing in the securities to which the prospectus relates. The new Corporations Act is not so detailed as the Codes in respect of the contents of prospectuses but the size of type is still specified.

Even the time for complying with a statutory requirement is frequently specified in primary legislation, and so it should be. There is nothing more annoying than being forced to look at a subordinate instrument to ascertain the time for compliance with a requirement contained in an Act. All relevant requirements in relation to a particular matter should, so far as practicable, be contained in the one place for the convenience of the user of the statute. An

exception would be in the case where a particular form should be used. Forms should not be included in primary legislation because of the frequent need to change them.

Another point is that, not only is it irritating to have to look at more than one instrument, but subordinate legislation is not always readily accessible. It was with this consideration in mind that the Administrative Appeals Tribunal Act was deliberately drafted to specify in great detail the time prescribed for making an application to the Tribunal for a review of a decision (section 29).

The topic under discussion is actually one aspect of a much larger topic that has in recent times been the subject of much debate among legislative drafters. Some years ago, the Commonwealth Secretariat commissioned Sir William Dale to conduct a comparison between the form of the statutes of the United Kingdom, France, West Germany and Sweden. His conclusion was that there was a significant difference between the style of British statutes and that of the continental statutes. He claimed that the continental statutes were usually expressed in terms of broad general propositions without any detail whereas the British statutes went into greater detail and were therefore harder to read. His conclusion seemed to me to be questionable because some continental statutes, particularly those of West Germany, did include a lot of detail. However, in those countries where there was little detail in statutes, the detail was not to be found in subordinate legislation either. It was left to the courts to work out how the general rules would apply in particular cases. This civil law approach would have real problems in Australia where, despite recent developments, the courts have a history of literal interpretation of statutes. In any event, the public and their advisers prefer to be told by the Act or regulations how the law is to apply and do not want to have to wait until the courts have issued rulings in particular cases before the way in which the law applies can be ascertained.

But there may be thought to be a better case for legislating by statute only in terms of general principles and leaving most of the detail to be dealt with in regulations. The former Attorney-General, Senator Durack, is on record as supporting this view. However, what is desirable differs from what can be achieved. In my view, this approach would not be acceptable to the Parliament, whose members generally hold the view that all matters of substance must be contained in the statute and not be left to delegated legislation. This is established doctrine and is propounded even though the delegated legislation is subject to Parliamentary disallowance.

Any conclusions reached at this conference may assist in persuading Parliaments to allow more matters of substance to be relegated to subordinate legislation so that statutes will tend to be confined to statements of principle. However, I do not hold out much hope of this occurring and, frankly, I prefer to see not only all the matters of substance included in statutes, but also major matters of procedure the policy of which has been decided when the Act is drafted. Subordinate instruments could then be left to deal with matters that have not been decided when the statute is enacted. If the procedural detail is likely to be subject to frequent changes, it also should be prescribed by subordinate legislation. For example, forms should clearly not be included in primary legislation since it is frequently necessary or desirable to alter them. The Extradition Acts of 1966 included several forms (following the British legislation that those Acts replaced) but subsequent amendments removed the forms and no forms are contained in the new Act passed last year.

In summary, the matters for prescription by regulation are minor procedural matters and forms and other matters that need frequent change but procedural matters that are of major importance, such as those affecting individual liberty, should be contained in primary legislation.

Geoff Kolts

MEMBERSHIP OF THE
AUSTRALIAN INSTITUTE OF ADMINISTRATIVE LAW
13 October 1989

Australian Capital Territory

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Mr D Emerson-Elliott (Barrister at Law)
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Professor D Pearce (Commonwealth Ombudsman)
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Mr A Anforth (Welfare Rights and Legal Centre)
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