Western Samoans as New Zealand citizens

David Heard*

David Heard analyses the advice of the Privy Council in Lesa *v.* Attorney-General, *a decision which declared that the appellant, along with many other Western Samoans, was a New Zealand citizen on the true construction of the British Nationality and Status of Aliens (in New Zealand) Act 1928. Heard argues that the Privy Council gave insufficient consideration to the broader context within which it conducted its interpretative exercise. In particular he submits that consideration of the repugnancy issue could have led to a contrary conclusion.*

I. INTRODUCTION

Western Samoa, formerly a mandated territory administered by the Government of New Zealand and later a Trust Territory, became a fully independent state in 1962. A Treaty of Friendship was signed between the two countries and, in furtherance of their special relationship, Western Samoans were granted rights to enter and work in New Zealand. Overstaying of temporary entry permits to New Zealand by Western Samoans resulted in many prosecutions from the 1970's[1] and it was a defence to such a charge under the Immigration Act 1964 that raised the issues canvassed in this paper.

II. THE CASES

A. Levave v. *Department of Labour*[2]

Levave, convicted of overstaying under section 14(5) of the Immigration Act 1964, appealed to the Court of Appeal claiming to be by descent a New Zealand citizen and thus exempt from the application of section 14(5) by sections 12 and 3(a) of the same Act. The case turned on whether or not the appellant's father, born in Western Samoa on 1 October 1926, had become, by virtue of the British Nationality and Status of Aliens (in New Zealand) Act 1923, a natural-born British Subject. That Act set out various sections of the British Nationality and Status of Aliens Act 1914 (U.K.) and they were "declared to be part of the law of New Zealand", "save only as modified by this Act" (i.e.

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1 See Yvonne Chan "Overstaying — Challenge Followed by Change" (1981) 11 V.U.W.L.R. 211.

2 [1979] 2 N.Z.L.R. 74.

the 1923 Act)[3]. One such section stated that "any person born within His Majesty's dominions and allegiance" was deemed to be a natural-born British subject.[4]

The argument focussed on section 14(1) of the 1923 Act which provided:

> Subject to the provisions of this section, this Act shall apply to the Cook Islands and to Western Samoa in the same manner in all respects as if those territories were for all purposes part of New Zealand; and the term 'New Zealand' as used in this Act shall, both in New Zealand and in the said territories respectively, be construed accordingly as including the Cook Islands and Western Samoa.

The appellant contended that by reason of this section and for the purposes of the Act as a whole, Western Samoa must be deemed to be "within His Majesty's dominions and allegiance"[5] and thus her father was a natural-born British subject.

The court, however, considered section 14 to be concerned with naturalisation only and not to alter the meaning of "His Majesty's dominions and allegiance." The court's reasons ran as follows:

(i) In the first limb of section 14(1) the words "shall apply to" naturally mean shall be "part of the law of" and the second limb only extended the definition of "New Zealand" as used in this Act and did not alter the meaning of "His Majesty's dominions and allegiance."

(ii) The Cook Islands, already "within His Majesty's dominions and allegiance", had no need of the claimed interpretation of section 14(1).

(iii) Resolutions adopted by the Council of the League of Nations[6] just prior to the passing of the 1923 Act proclaimed that the national status of inhabitants of a mandated territory should be distinct from that of the nationals of the mandatory power.

(iv) The Act was designed to bring about uniformity within the Commonwealth, at least in respect of natural-born British subjects and the appellant's contention conflicted with this aim.

(v) Section 4(1) allowed for naturalisation of aliens resident in New Zealand only and so section 14(1) was necessary to allow for naturalisation of the two named territories and this was the true purpose of section 14(1).

B. Lesa v. *Attorney-General*[7]

Lesa, also a Western Samoan being prosecuted under section 14(5) of the Immigration Act 1964, relied on the same argument but she argued her case

3 British Nationality and Status of Aliens (in New Zealand) Act 1923, s.3(1).
4 Section 1(1)(a) of the 1914 Act (U.K.), incorporated in the First Schedule of the 1923 Act.
5 In terms of s.1(1)(a) of the 1914 Act (U.K.), adopted by the 1923 Act.
6 Resolutions of the League of Nations Council, April 1923, set out in the Official Journal, League of Nations, 4 (1923) 603-604. Also set out in the judgment itself supra n.2, 79.
7 [1983] 2 A.C.20, [1982] 1 N.Z.L.R. 165.

in the civil courts after her application for a certificate that she was a New Zealand citizen was refused. Lesa, born in Western Samoa on 28 November, 1946, claimed to be a New Zealand citizen, not by descent as did Levave, but by birth. She relied not on the 1923 Act but on the British Nationality and Status of Aliens (in New Zealand) Act 1928 which replaced the former Act. The 1928 Act not only declared Part I of the Imperial Act (defining natural-born British subjects) to be part of the law of New Zealand[8], as the 1923 Act had, but it also adopted Part II of the Imperial Act (dealing with naturalisation)[9].

Counsel for the appellant, however, made not attempt to distinguish the *Levave* case[10] and indicated that an appeal to the Privy Council was intended. The Court of Appeal, following the earlier decision, answered the originating summons which asked whether Lesa had been a natural-born British subject by virtue of the 1928 Act in the negative.

The case proceeded on appeal to the Privy Council where in the closing stages of argument counsel for the appellant put forward a new argument later described by Lord Diplock, delivering the Privy Council's decision, as "formidable"[11]. This new argument took the following form: The title of the 1928 Act, section 7(2)(a) and section 7(2)(b) all indicated an intention to provide for naturalisation of persons resident in Western Samoa and yet the provisions of the 1914 Act (U.K.) adopted by section 3 of the 1928 Act provided for naturalisation only "within His Majesty's dominions". Therefore section 7(1) of the 1928 Act, identical to section 14(1) of the 1923 Act, must place Western Samoa for naturalisation purposes at least within "His Majesty's dominions." If section 7(1) were to have this effect for naturalisation purposes then it should have the same effect for the purposes of defining natural-born British subjects in those provisions of the Imperial Act declared to be part of the law of New Zealand by section 6 of the 1928 Act.

Their Lordships accepted this argument as valid and declared that it was impossible to say that the emphatic language of section 7(1) did not make the whole of the 1928 Act, and probably the 1923 Act as well, apply to Western Samoa. The Privy Council therefore allowed the appeal and answered the originating summons in the affirmative — yes, Lesa was a New Zealand citizen.

III. BROADER LEGAL ASPECTS

A. Mandate Nationality

It is widely accepted[12] that inhabitants of German colonies such as Western Samoa ceded by Germany pursuant to Article 119 of the Treaty of Peace 1919

8 Section 6 of the 1928 Act.
9 Section 3 of the 1928 Act.
10 Supra n.2.
11 [1983] 2 A.C. 20, 25.
12 See: Lewis "Mandated Territories" (1923) 39 L.Q.R. 458, 469; McNair "Mandates" (1928) 3 Cambridge L.J. 149, 155; Hales "Some Legal Aspects of the Mandate System" (1937) 23 Transactions of the Grotius Society 85, 96; Duncan Hall *Mandates, Dependencies and Trusteeships* (Stevens, London, 1948) p.77.

were no longer German subjects nor did they become nationals of the combined Allied Powers or the League of Nations. There is strong authority against the proposition that such inhabitants acquired the nationality of the mandatory power[13] nor did the mandates, especially the 'c' class mandates such as Western Samoa, create a nationality of their own.[14] It is generally conceded that the national status of mandated territories was in limbo, the inhabitants were stateless[15] but under the protection of the mandatory power[16] and so inhabitants of mandates conferred upon His Majesty had no nationality but were British Protected Persons[17] — this is borne out by the stamp "British Protected Person" on the passports of residents of Western Samoa.[18]

B. Resolutions of the League of National Council 1923

These resolutions declared that the national status of inhabitants of mandated territories should be distinct from that of the nationals of the mandatory power. The Court of Appeal in the *Levave* case[19] considered that it was not to be supposed that Parliament would legislate in a manner inconsistent with its international moral, if not legal, obligations under these resolutions whereas the Privy Council deemed the resolutions to be irrelevant in the absence of ambiguity in the Act.[20] An authoritative statement on the status of these resolutions is to be found in Oppenheim's *International Law:*[21]

> The Council having no power to make law, these resolutions must be regarded rather as an opinion and a direction entitled to great weight than as juridicial propositions, but it is generally accepted that they embody the correct doctrine.

It has been suggested by J. Crawford[22] that these resolutions regardless of their "formal status" could have been used to qualify the application of Part I of the 1914 Act (U.K.) declared to be part of the law of New Zealand by section 6 of the 1928 Act "in so far as the said provisions are capable of application in New Zealand". Section 3 of the 1928 Act adopted Part II of the 1914 Act (U.K.) without qualification and Crawford proposes that "on this slender basis" "His Majesty's dominions" could have been given a different meaning in Parts I and II. The writer agrees with Crawford in that there was an "underestimation

13 *R.* v. *Ketter* [1940] 1K .B. 787; *Wong Man On* v. *The Commonwealth* (1952) 26 A.L.J. 184; [1952] Argus L.R. 513; *Ffrost* v. *Stevenson* (1927) 58 L.R. 528, 552; K. Roberts-Wray *Commonwealth and Colonial Laws* (Stevens, London 1966) p.23.

14 Oppenheim *International Law* (8 ed., Longmans, London, 1955) p. 222; McNair, op.cit. 156.

15 N. Bentwich *The Mandates System* (Longmans, London, 1930) p.102; McNair, op.cit. 156; Hall, op.cit. 87.

16 Supra n.6.

17 *R.* v. *Ketter,* op.cit.; Bentwich, op.cit. 103; C. Parry *Nationality and Citizenship Laws of the Commonwealth and Ireland* (Stevens, London, 1957) p.10.

18 Pursuant to s.3(1) of the Passports Act 1946.

19 Supra n.2, 79.

20 Supra n.11, 33.

21 Oppenheim *International Law* (5 ed., Longmans, London, 1935) p.194.

22 J. Crawford "Case No. 3 *Falemai Lesa* v. *Attorney-General of New Zealand*" [1982] B.Y.I.L. 268, 272.

of the international significance of nationality in mandated territories"[23] but respectfully submits that the qualification suggested does not on its own provide an adequate basis for the distinction sought between Parts I and II of the Imperial Act.

C. Repugnancy

As both the 1923 and 1928 Acts were passed by the New Zealand Parliament prior to the adoption of the Statute of Westminster in 1947, the validity of both Acts was subject to the Colonial Laws Validity Act 1865 (U.K.). Section 2 of that Act provided: "Any colonial law which is or shall be in any respect repugnant to the provisions of any Act of Parliament extending to the colony to which such law may relate . . . shall be read subject to such Act . . . and shall to the extent of such repugnancy, but not otherwise, be and remain absolutely void and inoperative." This provision could well render the 1923 and 1928 Acts inoperative to the extent that they purported to confer upon Western Samoans the status of natural-born British subjects.

One must first ask whether section 1(1)(a) of the 1914 Act defining natural-born British subjects was a provision "extending" to New Zealand. Section 1 of the Colonial Laws Validity Act provided that a provision extended to a colony when "made applicable to such colony by the express words or necessary intendment of any Act of Parliament." The 1914 Act (U.K.) did not expressly make any of its provisions applicable to the colonies but section 9(1) raises a clear implication that it was the necessary intendment of the Act to extend to the colonies. Section 9(1) provides: "This Part of this Act [i.e. Part II] shall not . . . have effect within any of the dominions specified in the First Schedule to this Act [New Zealand was specified therein], unless the legislature of that dominion adopts this Part of this Act." The presence of that provision in Part II of the Act and its absence in Parts I and III leads one to the conclusion that Parts I and III were to "extend" to the colonies. Furthermore the 1911 Imperial Conference[24] which promoted the introduction of the 1914 Act (U.K.) did so to provide a uniform definition of British Nationality throughout the Empire and the nature of the subject matter, British Nationality, also indicates the 1914 Act (U.K.) would extend throughout the Empire. There is some authority to support this conclusion.[25]

Secondly one must ask whether the New Zealand law was repugnant to section 1(1)(a) of the 1914 Act (U.K.). Law dictionaries provide only limited assistance

23 Idem.

24 *Imperial Conference 1911 Dominions No. 7 Minutes of Proceedings of the Imperial Conference* 1911 (1911, Cmnd. 5745).

25 A. B. Keith *The Dominions as Sovereign States* (MacMillan, London, 1938) p.187. A. B. Keith *The Constitutional Law of the British Dominions* (MacMillan, London, 1933) p.62-63. P. Weiss *Nationality and Statelessness — International Law* (2 ed., Sithoff & Nordhoff, Germantown, Md., 1979) p. 16. Parry, op.cit. 84.

in defining repugnancy[26] but "inconsistent" emerges as a synonym for repugnant. In *Attorney-General for Queensland* v. *Attorney-General for the Commonwealth*[27] Isaacs J. defined repugnancy as "inconsistency" or "contrariety"[28] and Higgins J. had this to say: "I am strongly inclined to think that no colonial Act can be repugnant to an Act of the Parliament of Great Britain unless it involves, either directly or ultimately, a contradictory proposition, probably contradictory duties or contradictory rights."[29]

In *Union Steamship Co. of New Zealand* v. *The Commonwealth*[30] Isaacs J.[31] quoted from Hearn's *Government of England* thus: "repugnancy was defined to imply, not diversity, but conflict."[32]

Some degree of variance between the New Zealand law as interpreted by the Privy Council and the 1914 Act (U.K.) was acknowledged by their Lordships when they accepted the appellant's "claim to be a natural-born British subject in New Zealand law despite the fact that she would not be deemed a natural-born British subject under the Imperial Act itself".[33] Section 1(1)(a) of the 1914 Act (U.K.) sets out three categories of persons deemed to be natural-born British subjects. Applying the general rule of statutory interpretation known as *expressio unius est exclusio alterius* (or "express enactment shuts the door to further implication")[34] to this section, it is clear that only those persons were to be natural-born British subjects by that provision.[35] There is also some authority to support this view, Dicey and Keith had this to say: "Subject to the exceptional cases [as per sections 1(2)(b) and 1(1)(c)] . . . , no person who is born out of the British dominions is a natural-born British subject."[36]

Contrast this with the New Zealand legislation as interpreted by the Privy Council and an anomaly emerges. Western Samoa, not within His Majesty's dominions in terms of British law, is by virtue of the New Zealand legislation deemed to be within His Majesty's dominions and thus the definition of natural-born British subjects as laid down by the 1914 Act (U.K.) is altered. Keith's comment on this point should be noted " . . . Prior to the Statute of Westminster, it was not possible for any Dominion to vary this essential definition."[37]

As a result of the Privy Council's interpretation of the 1928 Act, Western

26 See: H. C. Black *Black's Law Dictionary* (5 ed., West, St. Paul, Minn., 1979). Hinde & Hinde *New Zealand Law Dictionary* (3 ed., Butterworths, Wellington, 1979). S. E. Marcentelli *Australian Law Dictionary* (Hargreen, Melbourne, 1980).
27 (1915) 20 C.L.R. 148.
28 Ibid. 167.
29 Ibid. 178.
30 (1925) 36 C.L.R. 130.
31 Ibid. 149.
32 Hearn *Government of England* (2 ed., Robertson, Melbourne, 1867) p.596.
33 Supra n.11, 28.
34 S. G. G. Edgar *Craies on Statute Law* (7 ed., Sweet & Maxwell, London, 1971) p.259.
35 Unless within the express exemptions created by section 1(1)(b) or 1(1)(c).
36 Dicey *A Digest of the Law of England with Reference to the Conflict of Laws* (5 ed., by A. B. Keith, Stevens, London, 1932) p.150.
37 Keith *The Constitutional Law of the British Dominions,* op.cit. 52-53.

Samoans were natural-born British subjects whilst the 1914 Act (U.K.) would define Western Samoans as aliens. The writer considers that when such inconsistency results in the open contradiction and conflict evident in the status of Western Samoans, as viewed through British and New Zealand eyes, one must acknowledge the existence of repugnancy.

Prima facie this appears to be a case for the application of the Colonial Laws Validity Act 1865 (U.K.) to invalidate the 1928 Act (and the 1923 Act) to the extent that Western Samoans became natural-born British subjects. However, there remain arguments against the application of the 1865 Act (U.K.) in this case.

Conceivably the Western Samoa Order in Council 1920[38] (U.K.) exempted the New Zealand legislature from these repugnancy limitations. Clause 3 gave that legislature "full power to make laws for the peace, order and good government of the Territory of Western Samoa . . . ". However, insofar as that Order conferred power on the New Zealand legislature, the power must be subject to the Colonial Laws Validity Act 1865 (U.K.). The British executive was not empowered to abrogate the legislative limitations on Colonial Parliaments by the Foreign Jurisdiction Act 1890 (U.K.)[39] or any other Act and if the result was this Order in Council was such an abrogation then it must be invalid to that extent.

Section 26(1) of the 1914 Act (U.K.) provides:

> Nothing in this Act shall take away or abridge any power vested in, or exercisable by, the legislature or Government of any British possession, or affect the operation of any law at present in force which has been passed in exercise of such power, or prevent any such Legislature or Government from treating differently different classes of British subjects.

Dicey considered:[40]

> . . . any legislation by the legislature of a British possession restricting the rights granted to aliens by the enactment [i.e. the 1914 Act U.K.] would be void for repugnancy. It is, however, probable that under section 26(1) of the Act or otherwise, the courts will find it possible so to interpret the Act as to avoid any interference with the freedom of colonial legislation.

At first glance then this gives rise to an argument against the operation of the repugnancy limitations on the New Zealand Parliament in respect of British Nationality. Nevertheless any "power vested in, or exerciseable by" the New Zealand Parliament at the time was subject to the Colonial Laws Validity Act 1865 (U.K.) and the British Parliament should not be taken to exempt a legislature from the repugnancy limitations by implication, rather express provision should be required. The argument also appears to be contrary to the general scheme of the Act which aimed at providing a uniform system for defining the status of natural-born British subjects throughout the Commonwealth. Furthermore, the New Zealand Parliament could not, prior to the Order in Council of 1920,

38 Promulgated by the British Government to enable the New Zealand Parliament to legislate extraterritorially for Western Samoa, see *Tagaloa* v. *Inspector of Police* [1927] N.Z.L.R. 883.

39 Which empowered the making of the Western Samoa Order in Council 1920 (U.K.).

40 Op.cit. 187.

legislate for Western Samoa and so the power to confer the status of natural-born British subject upon Western Samoans was not "vested in or exerciseable by" the New Zealand Parliament when the 1914 Act (U.K.) came into force.

IV. INTERPRETATION ISSUES

A. The Scheme of the 1923 and 1928 Acts

As a result of the Imperial Conference of 1911[41] the British Nationality and Status of Aliens Act 1914 (U.K.) was passed to provide a unified system for the granting of British Nationality throughout the British Empire. For reasons expanded by Sir Francis Bell[42], the then Attorney-General, the 1923 Act did not adopt Part II of the Imperial Act pursuant to the power granted by section 9(1) of that Act although later it was adopted by the 1928 Act.[43] In respect of Part I of the 1914 Act (U.K.) it was the intention of the New Zealand legislature (at least as reported in Hansard)[44] to conform with the Imperial Act and to adopt the same definition of natural-born British subjects. This intention is also reflected in the scheme of the 1923 and 1928 Acts.

Crawford[45] in seeking to qualify the application of Part I of the 1914 Act (U.K.) to Western Samoa relied on the words in section 6 of the 1928 Act providing for inclusion of Part I of the Imperial Act "in so far as the said provisions are capable of application in New Zealand", he points out that no such qualification exists in relation to the adoption of Part II of the Imperial Act. Further grounds for distinguishing between the inclusion of Parts I and II into New Zealand law appear from the wording of sections 3 and 6. Section 3 simply provides that "Part II of the Imperial Act . . . is hereby adopted", whereas section 6 provides that "The several provisions of the Imperial Acts set forth in the Second Schedule to this Act, in so far as the said provisions are capable of application in New Zealand, are hereby declared to be part of the law of New Zealand."

The precise effect of this difference in wording is difficult to determine but it raises an implication that a distinction was intended. It is submitted that the wholesale adoption of Part II by section 3 was intended to include those sections as part of the Act and thus subject them to the operation of other sections already in the Act such as section 7(1). However, when certain provisions are "declared to be part of the law of New Zealand" as in section 6, the intention manifested is that the substance or legal effect of those provisions themselves is incorporated into New Zealand law rather than that those provisions become part of the Act as with the adoption of Part II. Thus the writer suggests that

41 Supra n.24.
42 New Zealand Parliamentary Debates, Vol. 200, 1923, 935. W. D. Stewart, *Sir Francis Bell, His Life and Times* (Butterworths, Wellington, 1937) p.200.
43 *Summary of Proceedings of the Imperial Conference 1926* (1926, Cmnd. 2768). New Zealand Parliamentary Debates, Vol. 217, 1928, 938.
44 New Zealand Parliamentary Debates, Vol. 200, 1923, 936. New Zealand Parliamentary Debates, Vol. 217, 1928, 940.
45 Op.cit.

the distinction can be made and Part I of the 1914 Act (U.K.) becomes operative by virtue of section 6 without being subjected to section 7(1).

In addition, the declaratory nature of section 6 indicates that those provisions were already part of the law of New Zealand by virtue of the "extending"[46] of the 1914 Act (U.K.) to New Zealand and this is of significance in terms of the points relating to repugnancy.

B. Legal Presumptions of Interpretation

As an aid to statutory interpretation several legal presumptions have been developed by the Common Law whenever legislation admits of two constructions. Accepting that the provisions of the 1928 Act do present a degree of ambiguity then these presumptions become relevant aids to interpretation. There is a presumption against intending what is inconvenient or unreasonable[47] whereby "an intention to produce an unreasonable result is not to be imputed to a statute if there is some other construction available."[48] Where the interpretation accepted by the Privy Council resulted in the undermining of the accepted views of all parties concerned over a 50 year period this presumption should have been carefully considered.

A presumption against causing injustice[49] might also be relevant if the imposition of the status of natural-born British subjects upon residents of Western Samoa can be seen as an injustice. Furthermore, a presumption against inconsistency with established rules of international law[50] demonstrates the significance of the League Council's Resolutions of 1923.[51]

In federal jurisdictions such as Australia, Canada and the United States what amounts to a presumption of constitutionality has emerged.[52] By virtue of this presumption the courts will endeavour where more than one interpretation is possible to adopt that interpretation which will ensure the validity of the Act.[53] The doctrine has yet to be formally acknowledged in New Zealand but its existence in Canada and Australia particularly and its common sense basis would have a persuasive influence upon its implementation here. Given the doubts raised as to the validity of the 1928 Act by reason of repugnancy (adopting the Privy Council interpretation), the doctrine could have been applied to result in an interpretation of the 1928 Act which would accord with the Imperial Act.

46 In terms of the Colonial Laws Validity Act 1865 (U.K.).

47 P. St. J. Langan *Maxwell on Interpretation of Statutes* (12 ed., Sweet & Maxwell, London, 1969) p.199.

48 *Artemiou* v. *Procopiou* [1966] 1 Q.B. 878, per Danckwerts L.J., p.888.

49 Supra n.47, 208.

50 Ibid. 183.

51 Supra n.6.

52 P. Hogg *Constitutional Law of Canada* (Carswell, Toronto, 1977) p.47 and p.90. *Crowell* v. *Benson* 285 U.S. 22, 62. D. C. Pearce *Statutory Interpretation in Australia* (2 ed., Butterworths, Australia, 1981) p.27.

53 *Davies and Jones* v. *Western Australia* (1904) 2 C.L.R. 29, especially per Griffith C.J. at p.43.

V. CONCLUSION

It has proved beyond the scope of this article to investigate the ramifications of the decision in the *Lesa case*[54] but the legal issues arising from the case have been covered.[55]

The Privy Council decision was based almost entirely upon the narrow aspects of statutory interpretation and in the writer's opinion insufficient consideration was given to the broader issues of mandate nationality, international recommendations and uniformity within the British Commonwealth. In particular the writer submits that had the Privy Council been directed to the repugnancy issue then, by invalidation of part of the 1928 Act or by implementing a presumption of constitutionality, the court would have been compelled to come to the contrary conclusion. In this manner Lesa would not be considered a natural-born British subject either because the provisions purporting to confer upon her that status were void or because the only valid interpretation of those provisions would result in her never having had that status.

54 Supra n.11.

55 For detailed discussion of the consequences of the decision see the author's *Western Samoans as New Zealand Citizens* (1983) unpublished V.U.W. legal writing paper. For further reference see E. J. Haughley "The Privy Council Was Wrong" [1982] N.Z.L.R. 317; J. Evans "Some Fine Points of Statutory Interpretation and a Constitutional Upheaval" (1983) 10 N.Z.U.L.R. 278; P. J. Downey "Human Rights — The New Dimension" [1983] N.Z.L.J. 17; New Zealand Ministry of Foreign Affairs *New Zealand Citizenship and Western Samoans. Information Bulletin No. 4* (March, 1983).