

Anne Twomey, *The Chameleon Crown: the Queen and Her Australian Governors* (Sydney: Federation Press, 2006), xv + 304 pp., \$49.95, ISBN 9781862876293.

‘Like a chameleon,’ according to Twomey, ‘the Crown, is a unique and unusual creature within Australia’s constitutional law. It takes great care to protect itself by blending into its background so carefully that its presence is barely perceptible. It can, of its own volition, change its colour to suit its environment and deceive other as to its nature’ (p. 272). Drawing on original sources and archival material in the United Kingdom and Australia, Anne Twomey in *The Chameleon Crown* undertakes a detailed examination of this slippery concept, exploring its formulation from the early colonial period, to federation, and ultimately to the enactment of the *Australia Acts* in 1986. In each chapter we get a new and revealing glimpse into the subtle and complex relationship between the States, the Commonwealth, the United Kingdom and the Queen.

The book as a whole reveals a number of major themes that confirm, as well as challenge, orthodox views of Australian constitutionalism. For example, the book brings to the fore the central role of federalism in Australia. From the early attempts to secure independence, to the complicated negotiations concerning the *Australia Acts*, which provided the full judicial, legislative and executive independence from the United Kingdom Parliament, we see the States and the Commonwealth attempt to use independence as a means to secure, or gain, greater authority within Australian federalism. The perennial concern of the States was that freedom from colonial restraints should not be bought at the price of Commonwealth domination of the States. As the Queensland Crown solicitor put it in 1979, ‘We do not wish to be like the man in the gospel who was purged of the devils [which] later returned in greater numbers so that the last state of man was worse than the first’ (p. 199). The comment from Arthur Watts, a British Foreign Office Legal Adviser involved in the negotiations, is revealing. Watts, perhaps in frustration, argued a means had to be found ‘to stop the Commonwealth misleading the States about our views and misleading us about the States’ views and to stop the States misleading us about the Commonwealth’s views’ (p. 241).

The book also presents clearly the considerable and disproportionate constraints of colonial limitations on the states. For example, the orthodox view, shared by Australian politicians, judges and legal scholars, is that appointments to the position of state Governor are made by Her Majesty on the recommendation of the States. Twomey shows, however, that although the Secretary of State sought the views of the State government, the Secretary was not bound to follow their advice, especially if the candidate was considered unsuitable.

Finally, the book provides detailed accounts of how constitutional issues could be exploited for incidental political purposes. Sir Colin Hanna was appointed Governor of Queensland in 1972. After criticising the ‘fumbling ineptitude’ of the Whitlam government, a petition for his removal was sent to the Queen. The subsequent developments, including attempts by the Bjelke-Petersen government to extend Sir Colin’s appointment, were clearly intended as ‘political gesture’, (as British officials noted in exasperation if not anger), though the incident also had major ramifications for the negotiations of the *Australia Acts* (pp. 62-68).

These are only some of the major themes raised by the book. Given its breadth and scope, it would have been especially useful to have had a synoptic chapter outlining Twomey’s own views and insights into the evolution of the concept of the

Crown. Overall, *The Chameleon Crown* is written in clear and accessible language, intended for a general audience (a more technical book for the legal and academic community is planned for the future: p. xv). As a work that details the dynamic relationship between law and politics, it is a welcome addition to the study of Australian constitutionalism, and will become, as Justice McHugh notes in his Foreword (p. x), a classic account and the reference point for historians, constitutional lawyers and political scientists interested in understanding this curious creature, the Chameleon Crown.