



**THE FEDERAL
REDISTRIBUTION
SOUTH AUSTRALIA**

Submission OB286

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17 April 2026

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Submission to the Australian Electoral Commission (AEC) on the Proposed Redistribution and Renaming of the Electorate of Grey

Executive Summary

This submission opposes the proposed expansion and renaming of the electorate of Grey. Grey has existed continuously since 1903 as a Federation electorate and covers more than 92% of South Australia's landmass. At the commencement of the redistribution, its enrolment was within 1% of the quota, and projections indicate it will remain within the permissible range to 2030. The proposed boundary expansion is not due to a deficiency in Grey, but to address projected enrolment growth in neighbouring electorates. Expanding Grey to include parts of the cities of Salisbury and Playford would exacerbate the already significant logistical task of representing Grey and dilute its focus on regional, rural, and remote communities.

The submission also opposes the proposed renaming of Grey to honour Dr Lowitja O'Donoghue AC CBE DSG. While recognising her contributions, the name Grey has been in continuous use for over 120 years and is well established. Renaming is not only incongruent with AEC guidelines, which favour stability for Federation electorates, but would also impose unnecessary costs and confusion.

This submission recommends retaining both the current name and boundaries of Grey or adopting only minimal boundary adjustments if required.

Background

Grey is the largest federal electorate in South Australia and one of the largest in Australia. Spanning 908,595 km², Grey encompasses more than 92% of South Australia's landmass and incorporates 30 Local Government Areas (LGA's).

At the commencement of this redistribution on 12 August 2025, Grey had 129,724 enrolled electors, which is within 1% of the South Australian redistribution quota of 130,786.

Grey carries the highest number of electors of the 'big six' federal electorates in Australia (Durack, Lingiari, O'Connor, Grey, Maranoa, Kennedy).

This submission opposes both elements of the Redistribution Committee's proposal: the proposed expansion of Grey's boundaries through the addition of parts of the City of Playford and City of Salisbury, and the proposed renaming of Grey to O'Donoghue.

Proposed Boundary Changes

At the commencement of South Australia's redistribution on 12 August 2025, the enrolment of Grey sat within the permissible redistribution quota range of +/- 10%. Grey's enrolment of 129,724 represented a variation of -0.81% from the redistribution quota of 130,786. The projected enrolment of Grey as of 8 April 2030, based on current boundaries, is projected to be 132,595. This sits within the permissible minimum (131,562) and maximum (141,104) range of +/- 3.5% the projected enrolment quota (136,333).

The Redistribution Committee's proposal to add parts of the City of Playford and City of Salisbury to Grey is driven not by a numerical deficiency in Grey, but by the need to assist other electorates, primarily Spence, which is expected to exceed the projected enrolment quota. While it is accepted that Spence must decrease in size to meet requirements, consideration should be given to shifting the boundaries of other electorates.

The logistical realities of representing Grey cannot be understated. The sheer geographical scale of the electorate places demands on the sitting member that do not exist for MPs whose electorates can be traversed in a matter of minutes. Physical presence across an electorate is essential for effective representation, and in Grey, achieving that presence requires an extraordinary commitment of time and resources. Any further expansion of Grey's boundaries would only stretch that presence thinner.

Representing regional, rural, and remote South Australia has always been and should always be the role of the Member for Grey. The proposed expansion of Grey would add a fourth dimension of representing Adelaide's outer north growth areas, abating the voices of regional, rural and remote South Australians.

Section 66(3)(a) of the Commonwealth Electoral Act 1918 states that the projected enrolment in each electoral division in the state should, as far as practicable, endeavour to be within 3.5% of the average divisional enrolment. The secondary criteria set out in s.66(3)(b) states that, subject to paragraph (a), the Redistribution Committee shall give due consideration to:

- (i) community of interests within the proposed Electoral Division, including economic, social and regional interests;
- (ii) means of communication and travel within the proposed electorate;
- (iv) the physical features and area of the proposed electorate; and
- (v) the boundaries of existing Divisions in the State

Subsection 3A of the Act states that when applying subsection (3), the Redistribution Committee must treat the matter in subparagraph (3)(b)(v) as subordinate to the matters in subparagraphs (3)(b)(i), (ii) and (iv).

Since the AEC's enrolment projection for Grey satisfies the requirement of s.66(3)(a), the considerations set out in s.66(3)(b) support restraint in expanding the electorate of Grey.

This submission notes a concern about the weight placed on projected enrolment figures in redistribution decisions. The 2017 South Australian redistribution forecasted Grey's enrolment would increase by 649 electors (0.54%) between September 2017 and January 2022. By the May 2022 federal election, Grey had increased by 4,130 electors, an increase of 3.45%, more than six times the projected figure.

This history of forecast variance suggests that greater weight should be given to current enrolment figures when determining boundary changes.

While the strong preference of this submission is to retain the current boundaries of Grey, should the AEC determine that an adjustment to Grey's boundary is necessary, this submission proposes an alternative approach that minimises geographical expansion and avoids introducing two new LGA's (Playford & Salisbury) and one new state electoral district (Taylor) into Grey.

As an alternative, a segment of Light Regional Council currently situated within the electorate of Spence could be incorporated into Grey. This approach offers three advantages:

- 1) Grey would retain its current 30 LGA's rather than increasing to 32.
- 2) Grey would retain its current 5 state electoral districts instead of increasing to 6.
- 3) The geographical expansion of Grey would be minimised.

Proposed renaming

Named in honour of Sir George Grey, the electorate of Grey has existed since 1903 and forms part of the Federation electorates. Sir George Grey was a British explorer and colonial administrator who served as the 3rd Governor of South Australia from 1841 to

1845 and played a key role in stabilising the colony's finances during a period of economic difficulty.

The proposed new name recognises Lowitja O'Donoghue AC CBE DSG, a Yankunytjatjara woman born on the APY Lands within the electorate. Dr O'Donoghue became the first Indigenous person to train as a nurse at the Royal Adelaide Hospital in 1954, was named Australian of the Year in 1984, was appointed a Companion of the Order of Australia in 1999 and served as the founding Chair of ATSIC.

Two key naming guidelines for federal electorates, developed by the Joint Standing Committee on Electoral Matters, state that names of electorates should not be changed or transferred to new areas without very strong reasons, and every effort should be made to retain the names of original Federation electorates.

The name Grey is well established among the communities it serves and is among the most geographically recognised electorates in Australia, given its scale, profile and enduring history. The guidelines set a high bar for renaming Federation electorates, and this submission does not consider that bar to be met in the present circumstances.

It is the view of this submission that the explanation offered by the Redistribution Committee for the renaming of Grey, namely that Sir George Grey had limited connection and contribution to Australia, does not satisfy the naming guideline's criteria to override more than a century of established electoral identity.

Renaming an electorate carries unnecessary costs, with signage, stationery and voter communications all requiring updates. It also creates confusion for electors, particularly given the longstanding association of Grey with a significant proportion of South Australia's landmass.

These practical considerations are significant, especially where the naming guidelines require compelling justification for any change.

The most fitting way to honour Dr O'Donoghue's legacy with a federal electorate name is to reserve that name for a new electorate when one is created in South Australia. South Australia's representation entitlement may change in future redistributions as population grows relative to other states. When that occurs, a new electorate will require a name, and Dr O'Donoghue would be a worthy namesake. This alternative approach would create a permanent tribute without displacing the established name of a Federation electorate that has served this state for over 120 years.

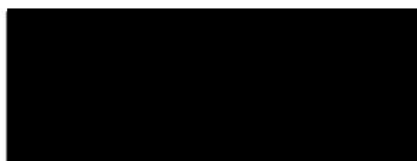
Conclusion

This submission respectfully requests that the Australian Electoral Commission:

- 1) Retain the current electorate name of Grey on the grounds that: It would be against the naming guidelines to change the name of a Federation electorate without very strong reasons; Grey is well-identified by regional, rural, and remote South Australians; and renaming Grey carries unnecessary financial and practical costs.
- 2) Retain the current boundaries of Grey on the grounds that: Grey was compliant at the commencement of the redistribution; Grey is forecasted to be compliant in the 8 April 2030 projection; and any expansion further diminishes the representation that regional, rural, and remote communities deserve.
- 3) If a boundary adjustment to Grey is considered necessary, consider the alternative of incorporating parts of the Light Regional Council currently in Spence.

Grey is one of Australia's most significant electorates, one of the largest geographically, the most enrolled of the six largest electorates, and an electorate of substantial historical and cultural importance to South Australia. The decisions of this redistribution should reflect the weight of that context.

Yours sincerely



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