

Reflections on a Revolution: Marriage and Its Alternative

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Introduction

“In a time of universal deceit – telling the truth is a revolutionary act” – George Orwell

Marriage Day is the celebration of a revolution. At least, it is so in the sense described by Orwell: the truth was told about marriage. On this 10th anniversary, there is much to reflect upon in that revolutionary act. And there is much to celebrate.

Reflections on the revolution of 2004

On this day, ten years ago, Parliament told the truth regarding marriage. It was a day on which marriage between a man and woman was venerated as a valued social institution. It was a day when the nation, through its Parliament, acting on bi-partisan support, set its face against trends in other countries to re-define marriage. It was a day when Australia chose its own way on marriage. On that day, it struck a blow for marriage, family and children, despite trends elsewhere to the contrary. On that day, it proclaimed legislatively that marriage in Australia is the legal union of man and woman entered into voluntarily for life to the exclusion of all others – just as it had been commonly understood in the law and in society since white settlement and since Federation.

Until 2004 the definition pronounced to describe marriage in *Hyde v Hyde*¹ was understood to be the definition of marriage in Australia. In 1961, the Parliament passed the *Marriage Act*. That unified marriage law under one federal statute and ended decades of complication in matrimonial law. In 2004, Federal Parliament enacted the amendment to the *Marriage Act* to the *Hyde v Hyde* definition and to forbid recognition of overseas marriages that were outside of the definition. In 2013 the High Court declared that the 2004 amendment excluded entry into the field of marriage by any other Australian jurisdiction.²

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¹ *Hyde v. Hyde and Woodmansee* (1866) L.R. 1 P. & D. 130

² *Commonwealth v Australian Capital Territory* [2013] HCA 55; 88 ALJR 118;

Acceptance of the *Hyde v Hyde* definition meant that marriage in Australia had the following elements:

- It is between a man and a woman
- Entry is voluntary
- The union is for life
- It is to the exclusion of all others

The acceptance of these elements has been that marriage, so understood³, is a specific form of legal, personal and social relationship. The first element precludes marriage of the same gender. The second precludes under-age and coerced marriages. Short term or temporary unions are precluded by the third. Marriage is only lawfully terminated by death or by a divorce pronounced by a court. The fourth element of the definition excludes the possibility of polygynous marriages, such as that at issue in *Hyde* and other forms of polyamorous unions.

The *Marriage Act* Amendment in 2004 was, in a sense described by Orwell, a revolution. In so doing, Australia declared itself to be capable of standing apart from many other Anglophone jurisdictions, the United Kingdom, nineteen of the fifty United States, Canada, New Zealand and South Africa, where marriage has been redefined. Each of these jurisdictions, of course, has some form of charter or bill of rights. As is now well recognised, this country has been divided on such a move but has, in the end, stood firmly against such a change.

Australia has no such charter or bill at the federal level. It is impossible to predict, with any certainty, how the questions that are thrown up about marriage might be dealt with in Australia if there were to be a conflict between rights to marry and to comment on marriage. As one who had previously long advocated for a bill or charter in this country⁴, even I have

³ In this paper, “*marriage*”, when referred to without any adjective or other qualifier in the context, refers to the definition found in *Hyde* and the 2004 Amendment.

⁴ *Paying For Human Rights Before The Bill Comes -Towards A More Comprehensive Domestic Implementation Of International Human Rights Norms In Australia* (Paper for the International Conference Commemorating The 50th Anniversary Of The Establishment Of The Supreme Court Of The Islamic Republic Of Pakistan, Islamabad, 12 August 2006); 'Feels Like Déjà vu: Religious Freedom and a Proposed National Bill of Rights for Australia' *BYU Law Review* (2010), 821 -857; *Freedom of Religion Under Bills of Rights* (University of Adelaide Press, 2012) (book, as joint-editor with Assoc. Professor Paul Babie); 'Religious Freedom and Bills of Rights: Australia as Microcosm', chapter in *Freedom of Religion Under Bills of Rights* (University of Adelaide Press, 2012) with Assoc. Professor Paul Babie, 1 - 11

to confess that under such instruments have produced, in a number of cases, counterintuitive results.⁵

Australia has been prepared to go its own way on several critical social issues. These include not only regarding a bill of rights, as mentioned, but also gun laws and retaining its own form of constitutional government that retains a representative of the monarchy. There is no reason why it should not be willing to preserve an institution that has worked to the benefit of society for hundreds of years.

There are now those who would advocate for yet another revolution, namely, a revolution to follow a trend in some other countries, and to change marriage into a different institution altogether. Looking back to Edmund Burke's in his *Reflections on the French Revolution*, I answer as I believe he would today: that the revolution of 2004 did *not* lay a foundation or create a precedent for yet further revolution in the institution of marriage. Instead, Parliament, in its wisdom, was revolutionary in upholding an institution that has worked for so many centuries to the benefit of society that it should not be changed without very strong evidence supporting such a change. It is an institution regarding which experimentation ought not to be lightly entered.

There was no analogy, as Burke eloquently argued, between the Glorious Revolution of 1688 and the French Revolution of 1796. With perhaps less eloquence but equal fervour, I argue that neither is there one between the marriage revolution of 2004 and the revolutions overseas for same-sex marriage.

Australia has every reason to celebrate the 2004 revolution and to stand firm on that foundation.

Brief overview

The argument must be evidence-based. This paper is an attempt to direct discussion along that path. The argument that runs through this paper is essentially that there is no

⁵ See as examples cases reported in or discussed at the following: *Craig and Mullins v Masterpiece Cake Shop Inc & Anor* State of Colorado Administrative Court CR2013-008, 6 December 2013; <http://www.reuters.com/article/2013/04/19/us-usa-gaymarriage-washington-idUSBRE93108820130419>, 3 June 2014; *Elane Photography LLC v Vanessa Willocke*, Supreme Court of the State of New Mexico, Docket Number 33,687; <http://www.independent.co.uk/news/uk/home-news/northern-ireland-bakery-refuses-to-make-gay-bert-and-ernie-wedding-cake-9590745.html>; The above are merely some examples. For discussion of recent events in Canada, see Benson, I T, "Law Deans, Legal Coercion and the Freedoms of Association and Religion in Canada" http://papers.ssrn.com/sol3/papers.cfm?abstract_id=2328945

demonstrated reason for a change in the definition of marriage in this country. The burden cast upon those that favour change is a heavy one.

This paper explores, though only in a preliminary way, some of the economic and social advantages of marriage as defined above. By the evidence put forward, it argues that, first, there has there been no material reason to depart from the position adopted by Parliament in 2004; secondly, it shows that any departure would be contrary to the growing evidence that marriage as defined in the amendment is the most desirable of social institutions upon which to base the rearing of children and the growth of strong social capital.

There is a full and rich literature on the subject spread among the various academic disciplines.⁶ In a paper of this kind, there are limitations upon the breadth and depth in which that literature can be explored. The benefits are considered by looking at the following:

- The statistical advantages of marriage
- The statistical disadvantages of parenting outside of traditional marriage
- The social benefits of stable marriage between biological parents for children
- The social and economic costs of divorce and family breakdown

In conclusion, I argue that Australia should stand its ground and that it should, into the future, continue to celebrate the revolution of 2004.

The Economic and Social Benefits of Marriage

Statistical advantages of marriage

Some of the evident benefits of marriage are outlined below:⁷

⁶ Only some of which are cited in the paper and referenced in the footnotes to the paper.

⁷ See generally <http://www.foryourmarriage.org/economic-impact/> at which each of the works cited are referenced

- Waite and Lehrer concluded upon their study that married people are more productive, have higher incomes, and enjoy more family time than the unmarried. This is due to the division of specialisation of labour as spouses each take responsibility for specified tasks.⁸
- Popenoe and Whitehead concluded that married men earn 10% to 40% more than similar unmarried men.⁹
- Married mothers are less likely to live in poverty.¹⁰
- Children are less likely statistically, to live in poverty if they are raised by biological parents whose marriage endures.

Professor Linda Waite observed:

In a variety of ways along a number of dimensions, married men and women lead healthier lives than the unmarried. This includes more drinking, substance abuse, drinking and driving and generally living dangerously among single men. Married women more often have access to health insurance. Divorced and widowed men and women are more likely to get into arguments and fights, do dangerous things, take chances that could cause accidents. The married lead more ordered lives, with healthier eating and sleeping habits. Marriage improves both men's and women's psychological well-being. Perhaps as a result, married men and women generally live longer than single men and women.¹¹

In his book *Maybe "I Do"*, the Honourable Kevin Andrews also aggregates examples from research as to the results of marriage compared with being unmarried:¹²

- Married men and women have statistically longer lives than the unmarried.
- Married men and women statistically have lower rates of contracting cancer and it seems that marriage offers a better chance of survival in the event of diagnosis.
- Those who are married have statistically lower incidents of premature deaths from cardiovascular disease, hypertension, pneumonia and stroke.

⁸ *The Benefits From Marriage in the US: A Comparative Analysis Population and Development Review*, Vol 29, No. 2, June 2003, page 264

⁹ *The State of our Unions*, 2005, page 16

¹⁰ *Marriage and the Public Good: 10 Principles*, Witherspoon Institute, 2006, page 20

¹¹ Cited in Kevin Andrews, *Maybe "I Do"* at 30

¹² At 30-31

- The married have statistically fewer mental problems, and tend to smoke and drink much less than separated or divorced men and women.
- Marital status has a stronger correlation with age at death than socioeconomic status for most major causes.

The research does seem unanimous to the effect that marrying and remaining married bring better health outcomes than any other form of lifestyle. The research also seems to be unanimous across jurisdictional boundaries, whether in the United States, Britain, Canada or Australia.¹³

In relation to a survey of almost 40,000 Australians to which Kevin Andrews refers¹⁴, researcher Jonathan Kelley observes, “*It isn’t just that happier people marry but when we follow single people over time, we find their happiness is actually boosted by marriage*”.

The benefits of stable marriage between biological parents for children

The evidence does not only indicate that marriage favours the wellbeing of adults, but, even more importantly, enhances in marked ways the happiness, health and adjustment of children. Children who are raised by their two biological parents within a stable marriage enjoy significant advantages. Whether it be in terms of better health¹⁵, enjoyment of subsequent adult relationships¹⁶, educational outcomes, children from stable marriages are significantly better off. In respect of the research on educational outcomes, Andrews observes:

Families are one of the strongest influences on the growth of human confidence, mental and emotional wellbeing and physical health. Four decades ago, the Coleman report identified the family rather than the school as the major determinant of learning outcomes for children. The results have been replicated many times. Children of Indochinese refugees, who had missed months, even years of schooling, and had lived in relocation camps, with scant exposure to western culture and little knowledge of the English language, were found to achieve remarkable success. The stunning success was not found in the schools that they had originally come from or to which they subsequently attended, but attributable to their family environment. This is just one illustration of

¹³ Andrews, 31-32

¹⁴ At 32

¹⁵ Andrews, 55 and following

¹⁶ Andrews, 66-67

the powerful impact of stable marriage and family life on educational outcomes for children.

Children who grow up in an intact family achieve higher school scores, report significantly less school-related behavioural problems and higher aspirations for tertiary studies. They also receive greater parental nurturance, mentoring and advising.

Statistical disadvantages of parenting outside of traditional marriage

It is clear, on the above examples, which reflect only a small fraction of the research that has been done, that stable marriage between biological parents is the best predictor of good outcomes for adults and children and a net contributor to social stability.

In a recent article social commentator Bettina Arndt¹⁷ cited a British High Court Judge and the observation that “couples” shouldn’t have children if their relationship is not stable enough to merit getting married. The observations of Sir Paul Coleridge were made while speaking before his retirement from a long family law career when his Lordship challenged the common notion that it makes no difference whether parents cohabit or marry. Arndt quotes him: “*One [arrangement] tends to last and the other doesn’t*”. In this the retiring Judge Sir Paul was quoting the Marriage Foundation research suggesting children and unmarried parents were twice as likely to suffer a family breakup as those with married parents. The proportion of children born to unmarried parents in Britain reached a record 47.5% in 2012.

Referring to a Brookings Institution report entitled “*Knot Yet*”, Arndt goes on to make the following observations:

The result, according to the report, is a growing social divide, with well-educated people still tending to marry and then have children, while lower socio-economic groups are more likely to have children in de facto relationships. These children often end up in single-parent families. This emerging difference in marriage patterns is adding to the gap between the haves and the have-nots, increasing social disadvantage.

Of course there are defacto couples with lasting relationships and thriving children, but the broader patterns tell a different story – just as the 90-year-old who smokes has the bearing on the link between cigarettes and health risks...

The media is part of the problem, given in their number are more than a fair share of cohabiting couples...

¹⁷ 16 December 2013 retrieved at <http://www.theage.com.au/comment/the-unspoken-truth-about-marriage-and-kids-20131215-2zf3f.html>

Public discussion of this important social trend is discouraged by media players who won't acknowledge that their preferred lifestyle choices have very different consequences on the other side of the social divide – yet the impact on kids of the casualization of family relations is no laughing matter.

One of the most shocking evils in the world today is the victimisation of millions of children by adult crime and selfishness. These phenomena are also indelibly etched into our national psyche and form part of our history that brings us shame. If the national disgrace as children of victims of divorce were not enough, in our recent history we have had the acknowledgement of the “*Stolen Generation*” and Royal Commissions into abuse of children in both publically-funded¹⁸ and religiously-organised institutions¹⁹.

Despite these glaring warnings of how society can systemically fail innocent children with alarming indifference, one is compelled to ask whether the lesson has yet been properly learned. Some social trends still move alarmingly towards the denial of the child's ability to identify with and live with their biological parents. Two of the foremost scholars on family, Wilcox and Marquardt, have recently expressed the social trend in these terms:

*Throughout history, marriage has first and foremost been an institution for procreation and raising children. It has provided the cultural tie that seeks to connect the father to his children by binding him to the mother of his children. Yet in recent times, children have been increasingly pushed from centre stage.*²⁰

One of America's most prominent legal scholars and social commentators, Professor Mary Ann Glendon, described the current law and attitude towards marriage and divorce in these terms:

*The [current] American story about marriage, as told in the law and in much popular literature, goes something like this: marriage is a relationship that exists primarily for the fulfilment of the individual spouses. If it ceases to perform this function, no-one is to blame and either spouse may terminate it at will... Children hardly appear in the story; at most they are rather shadowy characters in the background*²¹

And former Chicago Law Professor and Utah State Supreme Court Judge, now an international church leader, Dallin Oaks, observed as follows:²²

¹⁸ See the Mullighan inquiry into public institutional abuse: <https://www.sa.gov.au/topics/crime-justice-and-the-law/mullighan-inquiry>

¹⁹ <http://www.childabuseroyalcommission.gov.au/>

²⁰ W Bradford Wilcox and Elizabeth Marquardt, (Eds), *The State of our Unions: Marriage in America* (2011), 82

²¹ *Abortion and Divorce in Western Law: American Failures, European Challenges* (1987), 108

²² <https://www.lds.org/general-conference/2012/10/protect-the-children?lang=eng>

There are surely cases when a divorce is necessary for the good of the children but those circumstances are exceptional. In most marital contests the contending parents should give much greater weight to the interests of the children... Children need the emotional and personal strength that come from being raised by two parents who are united in their marriage and their goals. As one who was raised by a widowed mother, I know first-hand that this cannot always be achieved, but it is the ideal to be sought whenever possible.

Children are the first victims of the current laws permitting so-called “no-fault divorce”. From the standpoint of children, divorce is too easy. Summarising decades of social science research, a careful scholar concluded that “the family structure that produces the best outcomes for children, on average, are two biological parents who remain married.”²³ A New York Times writer noted “The striking fact that even as traditional marriage has declined in the United States... the evidence has mounted for the institution’s importance to the wellbeing of children”.²⁴ That reality should give guidance to parents and parents-to-be in their decisions involving marriage and divorce. We also need politicians, policymakers, and officials to increase their attention to what is best for children in contrast to the selfish interests of voters and vocal advocates of adult interests... We should assume the same disadvantages for children raised by couples of the same gender. The social science literature is controversial and politically charged on the long-term effect of this on children, principally because, as the New York Times writer observed, “Same-sex marriage is a social experiment, and like most social experiments it will take time to understand its consequences”²⁵

The social and economic costs of divorce and family breakdown

Children whose parents have always been married enjoy higher grades at school, greater educational achievements and live longer and happier lives with a better chance for success in their own marriages when they reach adulthood. The opposite occurs when they are subjected to the turmoil of divorce and relationship breakdown. It is the children who are clearly the major casualties of the poor personal and social choices made by those who care for them. Marriage is, on the evidence put forward in this paper, the optimal circumstance in which they should be raised. It is put up against other forms of social experiment on how the family should be arranged as a matter of policy.

²³ Charles Murray, *Coming Apart: The State of White America, 1960-2010* (2012) 158

²⁴ Ross Douthat, “Gay Parents and the Marriage Debate”, *New York Times*, June 11, 2012, <http://douthat.blogs.nytimes.com/2012/06/11/gay-parents-and-the-marriage-debate>

²⁵ Douthat, “Gay Parents and the Marriage Debate”

The other side of the marriage equation that has to be evaluated is the cost of divorce. Whereas a stable marriage is a net contributor to society as well as the wellbeing of all of the members of the family that is based upon that marriage, divorce is a net cost to the community.

A recent Newscorp analysis of information from the Attorney-General's Department and the Department of Human Services has shown that the financial cost of divorce annually is a huge one.²⁶ The article reporting on this analysis informs us that divorce and family breakdowns are costing the national economy more than \$14 billion a year in Court costs and government assistance payouts. Each Australian taxpayer now pays about \$1,100.00 per year to support families in crisis. The figures that were analysed in respect of the current financial year show that the government will spend \$12.5 billion on support payments to single parents, including tax benefits and rent assistance. Another \$1.5 billion will be spent on the administration of the child support system, while the cost to taxpayers from family disputes in Australian courts is \$202 million each year.

Commenting on the same set of statistics, social commentator Bill Muehlenberg observes:

The sexual revolution of the "60s" gave us a lot of harmful and destructive things, and no-fault, easy divorce was certainly one of them. By making the marriage contract hardly worth the piece of paper it was signed on, marriage became one of the most easily broken contracts around.

Indeed, instead of viewing marriage as a covenant, we managed to reduce it to a mere contract, and a contract extremely easy to unilaterally break. It is harder to get fired from McDonald's Family Restaurants today than it is to walk out on a marriage.

And there are tremendous costs all around when marriages break up. Obviously the couple is torn apart, along with the two families involved in the relationship. If children are part of the marriage, they suffer too.²⁷

In the same article, Muehlenberg refers to the numerous high quality longitudinal studies on the effects upon children when parents divorce. He observes, a fact which is almost trite: "So children are often the biggest losers when it comes to divorce." He then goes on to refer to the results of one of those studies conducted by Judith Wallerstein, who started interviewing a group of 131 children in 1975. These were children whose parents were all going through a divorce. Wallerstein asked the children to tell her about the intimate details of their lives

²⁶ "Divorce is costing the Australian economy \$14 billion a year", 6 July 2014, <http://www.news.com.au/lifestyle/relationships/divorce-is-costing-the-Australian-economy-14-billion-a-year>

²⁷ "Divorce now costs Australia \$14 billion a year", *Newsweek*, 19 July 2014, at 5.

which, Muehlenberg observes, they did with remarkable candour. Twenty-five years later her findings were published in a book that she co-wrote with Julia M Lewis and Sandra Blakeslee, *The Unexpected Legacy of Divorce: A 25-Year Landmark Study*.

Muehlenberg goes on to observe:

It is not just the families involved but also society as a whole, which loses out. Just as marriage is not a mere private affair, but is a public good and a social institution, so too divorce has more than just personal ramifications. All of society is impacted when couples break up. And we all pay a price here – quite literally.

Society suffers when marriages fail, and we all have to bear the costs, which are enormous.

What was unique about *The Unexpected Legacy of Divorce* was that it was a study in which the researcher, Wallerstein, stayed in contact with the group of 131 children, along with a control group of children who were in stable families, for a quarter of a century. In Muehlenberg's review of *The Unexpected Legacy of Divorce*²⁸, Muehlenberg cites from Wallerstein:

From the viewpoint of children, and counter to what happens to their parents, divorce is a cumulative experience. Its impact over time rises to a crescendo in adulthood. At each developmental stage divorce is experienced anew in different ways. In adulthood it affects personality, the ability to trust, expectations about relationships, and ability to cope with change... but it's in adulthood that children of divorce suffer the most. The impact of divorce hits them more cruelly as they go in search of love, sexual intimacy, and commitment. Their lack of inner images of a man and woman in a stable relationship and their memories of their parents' failure to sustain the marriage badly hobbles their search leading them to heartbreak and even despair... Children of divorce and those in happy intact families live in separate albeit parallel universes... What about the children? In our rush to improve the lives of adults, we assumed that their lives would improve as well. We made radical social changes in the family without realising how it would change the experience of growing up. We embark on a gigantic social experiment without any idea about how the next generation would be affected.

One feels compelled to agree with Muehlenberg's observations on both the book and its subject matter. Social science is teaching us that marriage alone cannot be the best of outcomes. It must be a stable marriage. And policy needs to encourage that outcome. This is precisely what history and common-sense should already have told us.

Social and economic costs and loss of social capital are bound up with failure to encourage stable marriage. The evidence behooves all legislators and policymakers to do all they can to

²⁸ <http://billmuehlenberg.com/2000/09/15/a-review-of-the-unexpected-legacy-of-divorce-by-judith-wallerstein/>

preserve the institution of stable marriage between biological parents. Recognising that departures from this ideal will, from time to time, arise or become necessary, legislators should not, on the evidence, lightly depart from marriage.

We need to look to what will produce the best outcomes for the next generation. This raises the question of whether experimentation with other forms of parenting is justified. And the question also needs to be asked whether society can afford the potential costs.

A clear choice

According to Girgis, Andersen and George²⁹, there are two views of marriage: The authors describe these in the following terms:

The conjugal view of marriage has long informed the law – along with the literature, art, philosophy, religion and social practice – of our civilisation... It is a vision of marriage as a bodily as well as an emotional and spiritual bond, distinguished thus by its comprehensiveness, which is, like all love, effusive: flowing out into the wide sharing of family life and ahead to lifelong fidelity. In marriage, so understood, the world rests its hope and finds ultimate renewal.

A second, revisionist view has informed the marriage policy reforms of the last several decades is a vision of marriage as, in essence, a loving emotional bond, one distinguished by its intensity – a bond that needn't point beyond the partners in which fidelity is ultimately subject to one's own desires. In marriage, so understood, partners seek emotional fulfilment, and remain as long as they find it.

Based on all of the evidence, including that gathered from other jurisdictions, there is no need to speculate in respect of the effect upon children when one departs from a policy model that favours a stable marriage between biological parents. There is enough evidence to demonstrate that conjugal marriage is to be preferred, indeed, even privileged as a policy option over any other form of relationship as the environment for bringing up children.

Conclusion

No protagonist for another form of environment in which to nurture both adults and children has discharged their burden of proof for either the necessity or desirability for departure from marriage as defined in the *Marriage Act*. Imprecations laced with “equality” and “love” are insufficient bases upon which to build reform, particularly, where children and time honoured freedoms are concerned.

²⁹ *What is marriage? Man and Women a Defense* 2012

The current policy decision in Australia is that no foreign marriage will be recognised in this country if it could not have been entered according to Australian laws. This prohibits the importation of foreign same-sex marriages, polygamous marriages, coerced and underage marriages. It is clear from experience in other jurisdictions that the conjugal form of marriage described above and defined in the *Marriage Act* carries the lowest risks to children, social wellbeing and our way of life.

One can ask some rhetorical questions that Burke might have posed: Why would a society experiment with the institution of marriage? Is the evidence in favour of children being raised by biological parents in a stable marriage not strong enough? Why would legislators and policymakers not be much more earnestly engaged in promoting stable marriage?

No-one has any justification for preaching to Australia that we ought to follow overseas trends. No number of sporting stars, sit-com actors, pop stars or talk show hosts can substitute for the need for careful analysis as to what it is actually good for this country.

In short, nothing has changed since 2004 to militate in favour of a change of the marriage model in Australia. Rather, the evidence points firmly towards retention and moving away from any social experiment with respect to children, divorce and economic outcomes.

Australia must continue to celebrate Marriage Day with all that it represents beyond this 10th anniversary and well into the future.
