

IN THE WAITANGI TRIBUNAL

WAI 2358

IN THE MATTER OF

The Treaty of Waitangi Act 1975

AND

the National Fresh Water and
Geothermal Resources Inquiry

**MEMORANDUM OF COUNSEL ON THE APPROPRIATENESS OF MR TIMOTHY
CASTLE CONTINUING AS A PANEL MEMBER IN THE WAI 2358 INQUIRY**

Dated: 22 March 2017

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Waitangi Tribunal

22 Mar 2017

Ministry of Justice WELLINGTON

TamakiLegal
Barristers & Solicitors

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MAY IT PLEASE THE TRIBUNAL

1. By way of Memorandum-Directions dated 9 March 2017¹ and 13 March 2017² (“the Directions”), the Presiding Officer sought submissions on whether it was appropriate for Mr Timothy Castle to continue as a panel member on the Wai 2358 inquiry, in light of the recent disclosure of his position and prior shareholding in Kahurangi Virgin Waters Ltd.
2. We have reviewed the Memorandum of Counsel filed by Mr Fowler QC dated 20 March 2017 in support of Mr Castle remaining as a panel member in the Wai 2358 inquiry. We support this memorandum and in accordance with the submissions made therein, agree that Mr Castle should remain as a panel member.

Dated at Auckland this 22nd day of March 2017



Darrell Naden
Counsel Acting

¹ Wai 2358, #2.6.13

² Wai 2358, #2.6.14