

**KEI MUA I TE AROARO O TE RŌPŪ WHAKAMANA I
TE TIRITI O WAITANGI**

BEFORE THE WAITANGI TRIBUNAL

WAI 2358

IN THE MATTER of the Treaty of Waitangi Act 1975

AND IN THE MATTER of the National Freshwater and Geothermal Resources
Inquiry

**MEMORANDUM OF COUNSEL FILING ANSWERS TO QUESTIONS IN
WRITING FOR HEARING WEEK 1**

Dated: 29 October 2024

Presiding Officer: Chief Judge Isaac

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Waitangi Tribunal

29 Oct 24

Ministry of Justice
WELLINGTON

Introduction

1. This Memorandum is filed on behalf of the New Zealand Māori Council (“NZMC”), regarding questions in writing arising from Hearing 1 of the National Freshwater and Geothermal Resources Inquiry.
2. Filed alongside this Memorandum are answers to the questions in writing for:
 - a) Dr Gregory Bignall, and
 - i. Appendix A: Driving the Uptake of Geothermal Direct Use in New Zealand: Successful Strategies, Empowered Champions, and Lessons Learnt Along the Way.
 - ii. Appendix B: Direct Utilisation of Geothermal Energy 2020 Worldwide Review.
 - b) Professor David Percy.
3. Counsel requests that these responses be added to the Record of Inquiry.

Dated at Wellington, this 29th day of October 2024



Donna Hall
Woodward Law
Counsel for the Claimants