

BEFORE THE WAITANGI TRIBUNAL

**WAI 2700
WAI 2872**

IN THE MATTER OF

the Treaty of Waitangi Act 1975

AND

IN THE MATTER OF

the Mana Wāhine Kaupapa Inquiry (**WAI 2700**)

AND

IN THE MATTER OF

a claim by Dr Leonie Pihama, Angeline Greensill, Mereana Pitman, Hilda Halkyard-Harawira and Te Ringahuia Hata for and on behalf of wāhine Māori (**WAI 2872**)

**MEMORANDUM OF COUNSEL FILING TE ŌHANGA WĀHINE MĀORI
REPORT**

Dated on this 16th day of December 2024

RECEIVED

Waitangi Tribunal

16 Dec 24

Ministry of Justice
WELLINGTON



**ANNETTE
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TĒNĀ E TE TARAIPUNARA:

Introduction

1. This Memorandum of Counsel is filed for and on behalf of the Wai 2872 claim/claimants: Dr Leonie Pihana, Angeline Greensill, Mereana Pitman, Hilda Halkyard-Harawira and Te Ringahuaia Hata for and on behalf of their whānau, hapū, iwi and wāhine Māori generally.

Te Ōhanga Wāhine Māori Report

2. This Memorandum of Counsel files with it the ‘Te Ōhanga Wāhine Māori’ report. The report was produced by BERL Research on commission by Manatū Wāhine – Ministry for Women. It estimates the size and nature of te ōhanga wāhine Māori.
3. Counsel seek leave to have the report added to the Wai 2700 Record of Inquiry.
4. Counsel notified Crown Counsel of our intention to file the report added to the Wai 2700 Record of Inquiry, which they had no objection to, noting that it is already publicly available.
5. However, they did inform us that Manatū Wāhine only commissioned the report and BERL Research are the kaitiaki of the information in the report. Therefore, if the report is used in evidence, Manatū Wāhine would need to engage with BERL Research on any questions concerning the methodology, findings, or output of the report.

DATED at Rotorua/Wellington this 16th day of December 2024



Annette Sykes



Maia Te Hira

Counsel for the Claimants