

In the Waitangi Tribunal  
Mana Wahine Kaupapa Inquiry

Wai 2700  
Wai 58

**In the Matter** of the Treaty of Waitangi Act 1975

**And**

**In the Matter** of the Mana Wahine Kaupapa Inquiry (Wai 2700)

**And**

**In the Matter** of a claim by Patricia Jane Tauroa & the late Nuki Aldridge on behalf of Ngā Hapū o Whangaroa (Wai 58)

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**Amended Statement of Claim**

**Dated 31 August 2018**

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**RECEIVED**

Waitangi Tribunal

**31 August 2018**

Ministry of Justice  
WELLINGTON

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**May it please the Tribunal**

1. This Amended Statement of Claim is filed on behalf of Patricia Jane Tauroa and the late Nuki Aldridge on behalf of Ngā Hapū o Whangaroa (Wai 58) (“the Claimants”) for inclusion in the Mana Wahine Kaupapa Inquiry.
2. This Amended Statement of Claim amends the earlier Statements of Claim filed by the Claimants in the Waitangi Tribunal and registered as Wai 58. The amended particulars in this Amended Statement of Claim significantly broaden the scope of the claim beyond those matters raised in the original Statement of Claim<sup>1</sup>. However, this Amended Statement of Claim amends and supports the original claim and subsequent amendments. It does not negate or replace it and the two should be read together for a more complete understanding of the Wai 58 claim.

**The Claim**

3. The Wai 58 claim was originally filed on behalf of nga iwi o Whangaroa under the Whangaroa Māori Executive Committee. This was amended in 1991 and a further amendment made in 2011 for the claim to be on behalf of Nga Hapu Whanau o Whangaroa, when the claimants were named as Patricia Tauroa and Nuki Aldridge. The claim is:<sup>2</sup>

*an overarching blanket claim for all Whangaroa claimants. It is therefore intended that the Wai 58 claim will form the taumata for, and be complementary to, other Whangaroa claims.*

4. The rohe relates to the area that formed the traditional rohe of the claimant hapu whanau, being generally the land encompassed by the Takou river in the south, the Oruaiti River in the North, which follows the

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<sup>1</sup> Wai 58, #1.1.

<sup>2</sup> Wai 58 Amended Statement of Claim, dated 30 September 2011 (Wai 1040, #1.1.4(i)) at 1.4.

general area of the former Whangaroa County Council (extending in various parts of the Mangonui, Hokianga and the Bay of Islands), together with the traditional fishing grounds and islands off the coast of the mainland (being inclusive of the Ruahine reef and the Kermadec Islands, by virtue of the existing undersea channels and reef linkages extending to and from the Whangaroa harbour).<sup>3</sup>

5. The Claimants have, since 1840 and to the present day, witnessed the Crown, through the adoption, development and implementation of policies, acts, omissions and legislation, create an environment detrimental and prejudicial to the mana of wahine Māori. The claimants have suffered significant denigration of their status as mana whenua, tangata whenua and kaitiaki of their rohe, and this Pakeha-centric environment has created a situation in which Whangaroa wahine have been seen and treated as lesser than their European counterparts, and as second-class citizens within their own country. Consequently, this has resulted in prejudice against and subjugation of Whangaroa wahine in all aspects of life and has impacted on their overall well-being.
6. The patriarchal mindset of female inferiority dates back to the colonial era, and the beliefs and attitudes brought to New Zealand through English law and Christianity, which were largely assimilated into society through the missionaries and their teachings. With Christianity came patriarchy, and the role of Māori women in society was immediately subsumed by this new structure, with the traditional role and status of wahine in Māori culture diminished and replaced with that of European beliefs.
7. The Claimants' position is that Mana Wahine is far more than the role that women played in Māori society, historically and traditionally, and in today's world. Mana wahine is the acknowledgement of the responsibilities of, and the need for, women as human beings. The female element is essential to the life and survival of all living species in

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<sup>3</sup> Wai 58 Closing Submissions, Wai 1040, #3.3.387 at [16].

the universe: plants, animals, fish and humans. It is even replicated in many engineering activities, where one part is deemed to be female while the corresponding part is described as the male element to allow the sound functioning of a piece of mechanical equipment.

8. The female element is as essential for the progeneration of life as the male element is. Yet sadly in our human world, the male takes predominance and is deemed to be the most important factor because of man's presumed physical strength and, in many cases, the supposition that they, men, are of higher intelligence than woman.
9. The importance of the female element is bound within the korero for Papatuanuku as the mother figure of the universe. It is Papatuanuku that gives birth to all things of this world and it is to Papatuanuku that all life will return. Respect for, and the care of, Papatuanuku is seen as paramount to our very existence.
10. In the Māori world, mana wahine begins with the understanding and acknowledgement of the importance of women as te whare tangata. Māori society, traditionally, recognized that without te whare tangata, there would be no continuation of their race. More importantly for rangatira of that time, there would be no continuation of their descendants. Therefore, in their own interests, te whare tangata needed to be protected.
11. As a result of the Crown's breaches of Te Tiriti, the Claimants as Whangaroa wahine have experienced severe disparities in outcomes and opportunities compared to Pākehā women and men. The obligations of Whangaroa wahine maintaining whanaungatanga, kaitiakitanga and manaakitanga has been threatened and their importance diminished through the decline in the mutual understanding of these concepts; concepts that are integral to maintaining the tikanga and culture of Whangaroa wahine. The Crown has therefore, as a result of its breaches of Te Tiriti, in particular the guarantees of tino rangatiratanga and

equality, caused significant prejudice to the Claimants as Whangaroa wahine.

### **Te Tiriti o Waitangi**

12. By Te Tiriti o Waitangi, the Crown:
  - (a) Confirmed and guaranteed to Māori tino rangatiratanga including the full, exclusive and undisturbed possession of their lands, estates, forests, fisheries, other properties, rivers, waterways and taonga;
  - (b) Promised to protect their rights guaranteed by Te Tiriti o Waitangi and perform their obligations arising out of Te Tiriti; and,
  - (c) Extended to Māori all the rights and privileges of British subjects.
  
13. The Crown has obligations to the Claimants which are derived from both the text and the principles of Te Tiriti o Waitangi (“Te Tiriti”). In respect of the Claimants’ mana wahine, the Crown, under Te Tiriti, has the following obligations to:
  - (a) Give effect to the Claimants’ tino rangatiratanga and autonomy and their ability to make and enforce their own laws and exercise their full customary interests as mana wahine;
  - (b) Treat the Claimants as equals to tane and Pakeha, and as partners by engaging reasonably and in good faith by recognising their interests and customary roles as mana wahine and ensuring equitable outcomes; and,
  - (c) Actively protect the Claimants’ property, taonga and customs and their significant interests as wahine, as well as protecting their ability to exercise their tino rangatiratanga.

14. The Claimants' position is that the Crown's duties should be read in light of the finding in Stage 1 in the Wai 1040: Te Paparahi o Te Raki Inquiry, that:<sup>4</sup>

*The rangatira did not cede their sovereignty in 1840; that is they did not cede their authority to make or enforce law over their people and within their territories. Rather, they agreed to share power and authority with the Governor. They and Hobson were to be equal, although of course they would have different roles and different spheres of influence.*

15. Counsel note the Tribunal is yet to make further findings on this in Stage 2 of the Wai 1040 Inquiry, however the Claimants' position is that the principles of Te Tiriti already established in jurisprudence can be read in light of the Stage 1 finding, and this is appropriate for the Claimants who are based, and whose rohe, is within the Te Raki region.

*Active protection*

16. The duty of active protection is, in the view of the Court of Appeal:<sup>5</sup>

*not merely passive but extends to active protection of Māori people in the use of their lands and waters to the fullest extent practicable*

17. The Court of Appeal also noted that the Crown's responsibilities and duties to Māori are analogous to fiduciary duties.<sup>6</sup>
18. The principle of active protection encompasses the Crown's obligation to take positive steps to ensure Māori interests and taonga are protected. A number of Tribunals and courts have, in applying this principle,

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<sup>4</sup> Waitangi Tribunal (2014) *He Whakaputanga me te Tiriti*, at 526-527.

<sup>5</sup> Waitangi Tribunal, Treaty of Waitangi Principles, <[www.waitangitribunal.govt.nz/treaty-of-waitangi/principles-of-the-treaty/](http://www.waitangitribunal.govt.nz/treaty-of-waitangi/principles-of-the-treaty/)> - *New Zealand Maori Council v Attorney-General* [1987] NZLR CA 54/87.

<sup>6</sup> *New Zealand Maori Council v Attorney-General* [1987] NZLR CA 54/87.

considered what 'interests' they see the Crown as being obliged to actively protect. The Crown has a duty to actively protect intangible assets and interests, like te reo Māori.<sup>7</sup> It is the Claimants' position that their personal wellbeing and welfare (and that of whānau and hapū) are interests that the Crown is obliged by Te Tiriti to actively protect, including the mana of wahine.

19. The Claimants' position is that the following duties relating to the Crown's duty of active protection:
- a) The Crown must protect the rights and interests of the Claimants as Whangaroa wahine in their ability to exercise tino rangatiratanga and kaitiakitanga. Furthermore, the Crown was obliged to recognize the existence of wahine rangatira and to ensure that their tino rangatiratanga is protected as well as that of male rangatira. This requires positive steps towards understanding the Claimants' interests, values and customs and then effectively protecting these; and,
  - b) The Crown has a duty to enact legislation and policies that are reasonable in the circumstances to protect the Claimants' rights and interests as Māori wahine.

### *Autonomy*

20. As part of the mutual recognition of kawanatanga and tino rangatiratanga, the Crown guaranteed to protect Māori autonomy, defined by the Turanga Tribunal as:<sup>8</sup>

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<sup>7</sup> See *New Zealand Māori Council v Attorney-General* HC Wellington CP942/88, 3 May 1991; *New Zealand Māori Council v Attorney-General* [1992] 2 NZLR 576 (CA) and *New Zealand Māori Council v Attorney-General* [1994] 1 NZLR 513 (PC).

<sup>8</sup> Waitangi Tribunal, Treaty of Waitangi Principles, <[www.waitangitribunal.govt.nz/treaty-of-waitangi/principles-of-the-treaty/](http://www.waitangitribunal.govt.nz/treaty-of-waitangi/principles-of-the-treaty/)>.

*the ability of tribal communities to govern themselves as they had for centuries, to determine their own internal political, economic and social rights and objectives, and to act collectively in accordance with those determinants.*

21. The Claimants' position is that the principle of autonomy requires the Crown to allow them to make their own decisions about their rights and interests in accordance with their own decision-making processes as mana wahine, rather than being subject to the attitudes and processes imposed by the Crown. The Claimants should be empowered and enabled to live as wahine, holding the mana and status they traditionally held within the whanau and hapu of Whangaroa.

#### *Partnership*

22. The principle of partnership imposes a duty on the Crown to act reasonably, honourably, and in good faith when dealing with Māori. The Waitangi Tribunal derives these duties from the principle of reciprocity and the principle of mutual benefit. In *Te Runanga o Wharekauri Rekohu v Attorney General* (1993) the President of the Court of Appeal at the time, Cooke P, summarised the principle of partnership:<sup>9</sup>

*It was held unanimously by a Court of five judges, each delivering a separate judgment, that the Treaty created an enduring relationship of a fiduciary nature akin to a partnership, each party accepting a positive duty to act in good faith, fairly, reasonably and honourably towards the other.*

23. The Claimants' position is that the principle of partnership, as applied to mana wahine, requires the Crown to:
- a) Ensure Whangaroa wahine were and are treated equally to Pakeha women and men; and,

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<sup>9</sup> *Te Runanga o Wharekauri Rekohu v Attorney-General* [1993] 2 NZLR 30, at 304.

- b) Recognise the extent and nature of the Claimants' tino rangatiratanga and customary roles of wahine, and give meaningful effect to these.

### *Equity*

- 24. The obligations arising from kawanatanga, partnership, reciprocity and active protection require the Crown to act fairly to both Pakeha and Māori – the interests of Pakeha could not be prioritised to the disadvantage of Māori. In circumstances where Māori have been disadvantaged, the principle of equity requires that active measures be taken to restore the balance,<sup>10</sup> which means not equality of access (which applies only when both parties are starting from an equal position) but equality of outcomes.
- 25. The Claimants' position is that the following duties relating to the Crown's policies and practices stem from the principle of equity:
  - a) The Crown is to recognise the disadvantaged position that the Claimants are in as Maori wahine, specifically due to the impact that the loss of land, loss of access, and lack of employment within the Claimants' rohe has had on the ability to have equal opportunities and outcomes; and,
  - b) The Crown is required to take active steps to rectify this position of inequality between Whangaroa wahine and Pakeha women and men, including Whangaroa men, in order to restore balance.

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<sup>10</sup> Waitangi Tribunal, Treaty of Waitangi Principles, <[www.waitangitribunal.govt.nz/treaty-of-waitangi/principles-of-the-treaty/](http://www.waitangitribunal.govt.nz/treaty-of-waitangi/principles-of-the-treaty/)>.

## **First Cause of Action: Lack of recognition for customary roles and status of Maori wahine under Tikanga Maori**

### **Breach**

26. The Claimants' position is that, in breach of Te Tiriti, the Crown has failed to recognize and give effect to the customary roles and status of Whangaroa wahine (economic, political and social) under Tikanga Maori. Women and men were equal under tikanga Maori but, with the introduction of European patriarchy, soon lost the ability to take on roles of leadership and were viewed as inferior and subordinate to men. There was no acknowledgment or change in government thinking regarding Tikanga Maori, and the fact it was a completely different culture to the one the Crown imposed.

### **Particulars**

#### *Removal of wahine from land ownership*

27. Due to actions and omissions of the Crown in breach of Te Tiriti, Maori women were often unable to own land or hold mana whenua in their own right, leading to the loss of whanau land to European settlers. The colonial understanding of ownership of land meant Maori wahine could not adequately protect land from alienation through a belief of not being entitled to speak and voice their views<sup>11</sup>. While Maori women owned land and were not barred from attending land court hearings, it is very rare to find a specific minute in Native Land Court hearings where Maori women gave evidence or statements of any kind – even though they were land owners.
28. Many Maori women are still alienated from their tribal lands and their whakapapa ties destroyed, due to the ongoing effects of the historical policies and practices of the Crown, its agents and its systems. Some Whangaroa wahine managed to retain land, however much of this land is

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<sup>11</sup> Claimant evidence to be adduced.

inaccessible due to it being landlocked.<sup>12</sup> Further Maori wahine have lost land through non-succession, particularly due to land being given to male counterparts and where Pakeha married Maori wahine.<sup>13</sup>

*Imposition of legal system without informed consent*

29. A few Maori wahine were signatories of Te Tiriti - to the extent that the British were interested in even including them - but were immediately sidelined thereafter. They were therefore 'invisibilised' even more than Maori men in terms of the Crown observing its Tiriti obligations. The patriarchal Pakeha legal system was even more onerous towards Maori women, who suffered from both racism and sexism, than it was towards Maori men. At no point were Maori women consulted about, nor did they ever agree to, the newly imposed system and its outcomes, such as legal rights.

*Rangatira and leadership*

30. Before colonization, Maori women had equal status and power as female rangatira to their male counterparts. Female rangatira signed Te Tiriti, evidence of their mana and role as leaders in contrast to the position of European women, and were guaranteed kawanatanga (authority), tino rangatiratanga (self-determination) and oritetanga (equality). The government therefore had and has the responsibility to protect wahine interests, facilitate the self-determination of wahine over their own affairs and ensure Maori women get equality of outcomes – not just equality of input. This has not happened, as illustrated by the lack of Maori women in leadership roles and decision making throughout New Zealand.
31. As has also been seen in the present day in the current Ngapuhi settlement process, women have been sidelined from roles of significance and

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<sup>12</sup> Claimant evidence to be adduced.

<sup>13</sup> Claimant adduced evidence.

decision making, with the team assigned to deal with Minister Little being all men - this is a carry-on effect from the attitudes imposed by colonization. In Whangaroa, very few women have had leadership roles. Maori wahine have been reluctant to even try to attain roles of leadership due to being made to feel inferior to men and, at times, Pakeha women.<sup>14</sup>

*Te Whare Tangata and puhi*

32. Under the Crown's practices and policies, there was no recognition for the role of women as te whare tangata, the bearers of life and essential for the continuation of human life, or acknowledgment of young women as puhi, and the specific roles encompassing that status and the mana placed on them.
33. This lack of recognition and understanding of these customary roles meant they diminished within a Pakeha-imposed society, the traditional knowledge severed and the protection of te whare tangata lost.
34. In just one example, there were specific teachings to young women as puhi in preparation for adult life that generally required washing in a specific place. This care has been lost to women due to them being estranged from their lands and also those specific tapu places being no longer available or accessible to them. This has meant the preparation of young Maori women for their own personal care and for the care of themselves as young women has been missing now for generations. The teachings enabling the maintenance of that knowledge to be carried forward to their adult lives and then passed on to their own children has been lost. Deforestation, urbanization and the fragmentation of families has meant that the intergenerational teachings from mother to daughter and to granddaughter has been broken, with the Crown failing to protect this tikanga.

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<sup>14</sup> Claimant adduced evidence.

*Education and language*

35. The Claimants say that Māori wahine have been prejudiced under the Crown imposed education system and have failed to get equality of opportunities leading to a failure in achieving equality of outcomes. This education system has led to the marginalization and devaluation of Whangaroa wahine and their knowledge in comparison to Pakeha men and women.
36. This Pakeha system had huge impact on traditional Maori teachings and customs, particularly affecting Whangaroa wahine, who played a crucial role in the continuation of whakapapa and knowledge in their role as *whare tangata*. *Te reo* was completely removed from the streamlined education system, resulting in a loss of understanding of wahine and their connection with the *whenua* and the teachings that would normally have been handed down through word of mouth teachings from one generation to the next. In some instances, scholarship opportunities arose for aspiring female leaders – however these instances took promising young girls away from their *ukaipo*, disabling them from passing on their traditional knowledge. Having then lived and learned within a Pakeha-oriented system, they themselves lost contact with their *matua* and *kaumatua* and were further absorbed into a process of alienation from *tikanga* Maori and *Matauranga* Maori.
37. Women had been the teachers of everyday living – standards of care, cleanliness, providers of material requirements, through weaving and the provision of food through gardening as well as the collection of *kai moana*. Deforestation and the loss of their lands and associated resources have made the continuation of these teachings impractical. The work done by women in the protection of *tikanga* and of living standards has been subsumed by the teaching practices and the rules and laws of the Crown. In many cases these laws and rules have denigrated Maori norms and ignored completely Maori standards and practices. And they often continue to do so to the present day.

38. The ideals of colonization were imposed, meaning the prospects of wahine Maori were limited to domestic professions and motherhood. Fostering higher aspirations was not encouraged or supported by the Crown, or society in general, and there was the unspoken expectation that girls will follow the path of subservience to men.

### **Second Cause of Action: Poor socio-economic outcomes for Maori women**

#### **Breach**

39. Due to the Crown's acts, omissions, policies and practices, there are significant disparities between Pakeha and Maori women. Maori women are more likely to suffer worse education, housing, employment, health and economic outcomes, as reflected in various statistics.

#### **Particulars**

##### *Loss of traditional health practices*

40. Maori women health statistics show significant health disparities when contrasted to those of Pakeha women. This is largely due to the flow on effect from a loss of customary practices, such as those surrounding rongoa and the imposition and effects of the Tohunga Suppression Act.<sup>15</sup> Traditional knowledge of health was lost, and Maori women were forced to adopt to the Pakeha health system, under which they were often not treated equally to Pakeha women.<sup>16</sup> The changes in family situations from being an extended family to the colonial nuclear family, meant and still means, that traditional practices of care and cleanliness of the person and one's surroundings, have been lost.

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<sup>15</sup> Claimant adduced evidence.

<sup>16</sup> Claimant adduced evidence.

*Education and employment disparities*

41. Te Reo and Maori history has never been valued and still isn't valued as much as other subjects and languages under the Pakeha education system. The Claimants say that it makes them sad to see that at present with an increase in popularity of te reo Maori numerous private "educators" are trying to be in on the act of providing teaching and learning platforms – all with a view to make a profit for personal gain. The notion that Maori language has no commercial or economic value for society at large was largely due to the policies and practices of the Crown, reflecting the contemptuous attitudes in general society towards things Maori, and this has led to education and economic disparities between Maori women and Pakeha.

*Prejudice against mothers of illegitimate children*

42. The stigma of bearing illegitimate children was immense and often resulted in poor socio-economic outcomes for Maori wahine. Unmarried mothers suffered the social consequences within a Pakeha society, even though the fathers were very frequently Pakeha men, who could walk away scot-free from their Maori lovers and offspring.

**Third Cause of Action: Domestic violence against Maori wahine**

**Breach**

43. The Claimants' position is that, in breach of Te Tiriti, the Crown has contributed, largely through its policies and practices of colonization, to the violence experienced and suffered by Whangaroa wahine. The Claimants say the Crown has done this by:
- a) Failing to recognize and give effect to traditional whanau and hapu structures, which altered the position and status of wahine;

- b) Failing to recognize and address the deprivation in Whangaroa, which is a huge cause of incidents of domestic violence against wahine and tamariki; and,
- c) Failing to recognize that the denigration of Maori culture and the place in it of wahine Maori, and the stresses placed on individual Maori through racist actions, is seen by Maori as the cause of many mental health issues among our Maori people.

### **Particulars**

#### *Drugs, alcohol and violence*

- 44. The deprivation and lack of opportunities facing Whangaroa has been a huge factor in the rise of domestic violence against wahine. Many men turn to drugs and alcohol which, when coupled with the diminished status of Whangaroa wahine due to the belief systems imposed through colonization, lead to men viewing women as property and abusing them.
- 45. The reliance on drugs over a considerable number of years has affected men to the point the only thing that makes them feel good about themselves is to abuse and assault women, making them feel powerful. The increase in the use of drugs has added to this, and with a lack of employment opportunities many have turned to drug manufacturing to generate income, which has impacted on domestic violence against Whangaroa wahine.

#### *Effect of war service*

- 46. War service had a huge impact on the whanau structure, with women suddenly becoming the sole providers for their families without male support. Women had to assume the roles of kaumatua and heads of the household, only for the men to return to and expect the roles to switch back. Many men struggled to adapt, and consequently took their frustrations about loss of their own former status and roles out on the women then

suffered physically in addition to having to cope with the pendulum effect in their societal roles.

*Failure to address domestic violence*

47. The Claimants also say that the Crown has failed to address violence against Maori wahine, creating further prejudice against Whangaroa wahine. The Crown's current policies based on Pakeha and Western ways are not reducing violence and are not what is needed. The cause needs to be addressed, not the symptoms of the issue.

**Breaches of Te Tiriti o Waitangi**

48. The following Te Tiriti principles inter alia have been breached by the Crown in respect of mana wahine:
- a) Autonomy;
  - b) Partnership;
  - c) Active protection; and,
  - d) Equality.
49. The breaches of the principles of Te Tiriti that give rise to the Claimants' grievances include, but are not limited to, that the Crown:
- a) Failed to recognise and give effect to the Claimants' autonomy and tino rangatiratanga and their ability to make and enforce their own laws and exercise their customary rights and interests as mana wahine;
  - b) Failed to ensure that Maori wahine were and are treated equally to tane and Pakeha women, by providing equal opportunities for equality of outcomes, and giving effect to the customary roles of the Claimants as mana wahine; and,

- c) Failed to actively protect the Claimants' property, taonga, customs and interests as wahine, including their mana and ability to exercise their tino rangatiratanga.

### **Findings and Relief Sought**

50. The Claimants seek the following findings, that:

- a) Their claim is well-founded;
- b) The Claimants have, and continue to suffer prejudice in respect of their traditional role as whare tangata, as a result of Crown action and inaction;
- c) The Crown has breached its duties under Te Tiriti o Waitangi in respect of the issues raised by the Claimants as wahine, and the cumulative effect that these issues have had in the loss of the traditional status and role of wahine; and,
- d) The usurpation of matauranga Maori and replacing it with an almost total emphasis on financial and economic gain have left the Claimants with a huge burden of poverty of mana, poverty of self esteem and poverty of spirit as they struggle to recapture what was taken from them.

51. The Claimants seek the following relief:

- a) An acknowledgement and apology from the Crown for the breaches of Te Tiriti as outlined in this Amended Statement of Claim;
- b) A recommendation of wahine representatives in the Ngapuhi settlement process; and,
- c) A recommendation for the integration of whare tangata and traditional Whangaroa wahine knowledge and practices in the

education and health system through policy implementation and specific resourcing to Maori women groups to assist with the reclamation of mana wahine principles.

**Leave to amend claim**

52. The Claimants reserve the right to seek leave to further amend this Statement of Claim as the Mana Wahine Kaupapa progresses and further research is made available.

**Dated** at Wellington this 31<sup>st</sup> day of August 2018



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**Dr B D Gilling / S P Dysart**  
**Counsel for the Wai 58 Claimants**