

IN THE WAITANGI TRIBUNAL
THE IDENTITY AND CULTURE KAUPAPA INQUIRY

WAI 3500
WAI 88 & 89
WAI 1837
WAI 1928
WAI 113C

IN THE MATTER OF

the Treaty of Waitangi Act 1975

AND

IN THE MATTER OF

the Identity and Culture Kaupapa Inquiry (WAI 3500)

AND

a claim by the late Te Pehi Parata, Ani Parata, Darrin Parata and Damian Parata for and on behalf of Te Āti Awa Marae Committee, other whānau and hapū of Te Āti Awa/Ngātiawa ki Waikanae, and descendants of Te Kakakura Wi Parata Waipunahau (the Kāpiti Island claim) (WAI 88)

AND

a claim by the late Te Pehi Parata, Ani Parata, Darrin Parata, Karen Parata, Matthew Love-Parata, Ratapu Nelson Solomon, Sandra Louise Marama Edwards, Lois McNaught, Hauangi Kiwha and Doris Lake for and on behalf of Te Āti Awa Marae Committee, other whānau and hapū of Te Āti Awa/Ngātiawa ki Waikanae, and descendants of Te Kakakura Wi Parata Waipunahau (the Whitireia Block claim) (WAI 89)

AND

a claim by Deirdre Nehua for and on behalf of the whānau, hapū and iwi of Te Tai Tokerau (the Whānau and Hapū of Te Tai Tokerau Settlement Issues (Nehua) claim) (WAI 1837)

AND

a claim by Gloria Karaitiana on behalf of herself and her whānau (the Descendants of Te Hirawanu (Karaitiana) claim) (WAI 1928)



a claim by Stephanie Turner and Heeni Collins as the descendants of the whānau of Te Rauparaha and as descendants of Hapekituarangi (Ngāti Huia, Ngāti Kikopiri, hapū of Ngāti Raukawa) (WAI 113C)

MEMORANDUM OF COUNSEL REGARDING OUR CONTRIBUTION TO THE INQUIRY

Dated 18 July 2025

COUNSEL ACTING

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TE ĀRAHI LAW
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MAY IT PLEASE THE TRIBUNAL

1. This Memorandum of Counsel is filed on behalf of the following Claimants:
 - (a) The Kāpiti Island and the Whitireia Block claims (**Wai 88 and 89**);
 - (b) The Whānau and Hapū of Te Tai Tokerau Settlement Issues claim (**Wai 1837**);
 - (c) The Descendants of Te Hirawanu (Karaitiana) claim (**Wai 1928**); and
 - (d) A claim by Stephanie Turner and Heeni Collins as the descendants of the whānau of Te Rauparaha and as descendants of Hapekituarangi (Ngāti Huia, Ngāti Kikopiri, hapū of Ngāti Raukawa) (**Wai 113C**).

("the Claimants")

2. We refer to the Memorandum-Directions dated 7 July 2025 (Wai 3500, #2.5.7), whereby outlines the opportunity for parties to file further contributions to the Kaupapa, whether they were able to attend the Hui Whakatuwhera in person or not by 5pm, Friday 11 July 2025, addressing the following matters mentioned in paragraphs [13] and [14]:¹
 - (a) How do we define or understand the concept of 'identity' within the inquiry?
 - (b) How do we define or understand the concept of 'culture' within the inquiry?
 - (c) Think broadly on what they believe should help form our understanding of what 'culture and identity' means or includes within the scope of this inquiry;
 - (d) Discuss whether the topics already included are correct; and
 - (e) Discuss what, if anything, might need to be address to the scope.

3. On 11 July 2025, counsel filed a Memorandum seeking an extension to file our contributions to the Inquiry, including contributions from Claimants who have recently instructed us that they wish to participate in the inquiry by 5pm, Friday 18 July 2025,² which was granted.³

¹ Wai 3500, #2.5.7 at [13] and [14].

² Counsel filed Memorandum by email on 11 July 2025 at 4.57pm.

³ Confirmation email sent by the Waitangi Tribunal Deputy Registrar on 15 July 2025 at 2.29pm.

4. Counsel has attached our Claimants' responses to the some of the questions mentioned in paragraph [2] of this Memorandum as **Appendix "A"**. Therefore, we respectfully seek leave for this to be added to the Record of Inquiry.

DATED this 18th day of July 2025



Chris Beaumont
Counsel for the Claimants



Tekih Veikoso
Counsel for the Claimants