IN THE WAITANGI TRIBUNAL

WAI 3500
WAI 2143
WAI 3073

IN THE MATTER	of the Treaty of Waitangi Act 1975
AND	
IN THE MATTER	of the Taku Ahurea, Taku Tūākiri: Cultural Identity Kaupapa Inquiry (Wai 3500)
AND	
IN THE MATTER	a claim by Steven Wilson and Karen Pointon on behalf of Ngāti Turi (Māori Deaf) (Wai 2143)
AND	
IN THE MATTER	of a claim by Tania Kingi on behalf of Te Roopu Waiora (Wai 3073)

MEMORANDUM OF COUNSEL FILING STATEMENT BY TE ROOPU WAIORA AND TAANGATA TURI

Dated: 2 September 2025

RECEIVED
Waitangi Tribunal
2 Sep 25
Ministry of Justice
WELLINGTON

BENNION LAW

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MAY IT PLEASE THE TRIBUNAL

1. This memorandum of counsel is filed on behalf of:

   a. A claim by Tania Kingi on behalf of Te Roopu Waiora (Wai 3073); and

   b. A claim by Steven Wilson and Karen Pointon on behalf of Ngāti Turi (Māori Deaf) (Wai 2143).

   (together "the claimants")

2. The claims have been included within the Taku Ahurea, Taku Tūākiri: Cultural Identity Kaupapa Inquiry.[1] However, the claimants were unable to attend Hui Whakatuwhera, due to other pressing commitments and the additional time and requirements associated with whaanau hauaa access to Waitangi Tribunal processes.[2]

3. Further documents related to the Hui Whakatuwhera were due to be filed by 11 July 2025.[3]

4. The claimants seek leave to file the attached statement as a background document to the issues they raise within the inquiry. This statement sets out the cultural identity of whaanau hauaa and how imposed concepts of 'disability' have worked to dislocate whaanau hauaa from te ao Maaori.

5. We submit that minimal prejudice will arise from the late filing of this document, given that the projected time for further hearings will not occur until around 2031.[4] Counsel will be available at the 22 September judicial conference to speak further to this matter as required.

Dated at Wellington this 2nd day of September 2025

Tom Bennion / Emma Whiley / Kudrat
Counsel for the claimants

[1] Wai 3500, #2.5.4(a).
[2] The full Waitngi Tribunal accessibility protocol as adopted in the stage two phase one Health Kaupapa Inquiry sets out requirements for fully acessible hearng processes (Wai 2575, 2.6.059(a)).
[3] Wai 3500, #2.5.7.
[4] Wai 3500, #2.5.8.