

**Before The Waitangi Tribunal**

**WAI 2358**

**I Mua Te Roopu Whakamana I te Tiriti**

**WAI 3457**

**In the Matter of**

the Treaty of Waitangi Act 1975

**AND**

**In the Matter of**

the National Freshwater and

Geothermal Resources Inquiry ( Stage 3)

**Memorandum of Counsel WAI 3457 – Savage Whanau Trust as per Tribunal Directions dated 4 Whiringa-aa-Nuku / November 2025**

**Dated : 5 December 2025**

**Solicitor: Mr G Morrell**

Solicitor

Pukekohe

**Counsel Acting: P T Harman Esq**

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Waitangi Tribunal

**5 Dec 25**

Ministry of Justice  
WELLINGTON

## May it Please the Tribunal

1. The purpose of this memorandum is to respond to direction of this Tribunal which at paragraph 30<sup>1</sup> asked Counsel for WAI 3457 claimants to advise Tribunal of existence or not of documentation to support what Ms Pacey attested to whilst orally presenting paragraph [39] her written affidavit evidence ( WAI 2358, doc I 62 at [39]).
2. At doc I 62 paragraph [39] of her affidavit dated 1 Paengawhaawhaa 2025 Ms Pacey recorded what her family were facing in a quantified monetary terms in the period 1951 -1955 when the Crown and Tasman Pulp & Paper came to Onepu and decided to establish a Pulp and Paper Mill there. Ms Pacey at hearing agreed that the figure of L200,000,000 Pounds Sterling was incorrect; and that it was most likely twenty million pounds sterling.
3. In support of that twenty million pounds sterling figure Counsel and Ms Pacey ask that the Tribunal have regard for the following documentation:-
  - (a) Document I 62, Exhibit "A" document A11 pg 26; which cites a NZ Press Association [NZPA] report published on 15 November 1952 report quoting then Minister of Labour and Employment stating in response to president Whakatane Chamber of Commerce that 12 million pounds sterling was being spent at Onepu for establishment of pulp and paper mill<sup>2</sup>; and
  - (b) Document I 62, Exhibit "A" , document A 21 pg 41 ; which speaks via a NZPA published on 23 March 1953 of a 7 million pound sterling loan raised by Tasman Pulp and Paper Coy Ltd; and

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<sup>1</sup> WAI 2358, doc 2.6.142

<sup>2</sup> I 62, doc A41, pg 89 mentions 13 million pounds sterling out of a total L70,557,000 (pounds sterling) total infrastructure spend as at 23 July 1954 being spent on finance for Murupara

(c) Document I 62, Exhibit "A" document A 22, pg 43, 44 again another NZPA statement published 23 April 1953 which records the then Minister of Finance stating the estimated costs of Government works connected with Murupara project and the pulp and paper mill for Tasman Pulp and Paper Limited was L13, 229,000 pounds sterling. Page 44 of document A 22 breaks down how, and where that taxpayer monies were being spent.

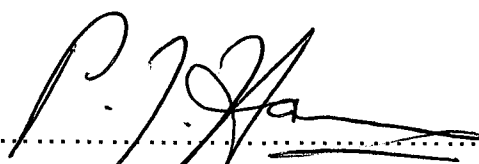
(d) Document I 62, Exhibit A document A 31 being NZPA published statement attributed to Sir James Fletcher as at 23 September 1953 indicating the new pulp and paper industry had a value of L20,000,000 pounds sterling;

(e) Finally annexed to this memorandum marked Appendix "A" is an extract sourced by Ms Pacey at National Archives NZ (Item R11963526 which is a photocopy extract from the Tasman Pulp and Paper Company Limited Financial Statement as October 1956 which in end figure shows a 21 million pounds sterling of overall value that that company saw as its value.

The point is that when the Government stated figures of infrastructure spend are added to private capital sums documented above one comes to the 20 million pounds sterling private /public spend.

4. As per Ms Pacey's oral correction at hearing, as per documentation referred to, and cited in this memorandum, Counsel asks that this Tribunal accept the "20,000,000" as replacement for the stated "200,000,000"; and the cited above documentation in support of that asserted historical fact.

Dated this 5 December 2025 at Te Wairoa

  
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P T Harman - Counsel for WAI 3457 Claimants