

I TE RŌPŪ WHAKAMANA
I TE TIRITI O WAITANGI

Wai 3555
Wai 87
Wai 1794
Wai 2160

KEI RARO I TE MANA

te Ture o Te Tiriti o Waitangi 1975

I TE TAKE O
Ā

the Waipāoa Remedies Inquiry (Wai 3555)

I TE TAKE O
Ā

a claim by the late Claude Edwards and Adriana Sylvia Edwards for and on behalf of Whakatōhea hapū (Wai 87)

I TE TAKE O

a claim by Muriwai Wehi, William Smith and Aden Webb, on behalf of Tūranga Pikitoi Hapū (Wai 1794)

- a claim by John Robert Edwards, Alexander Joseph Edwards, Frank Porter, Adriana Sylvia Edwards, Theresa Patricia McMurtrie, Ruth Gage, Georgina Hope Fleet, Eva Edwards, Tony Rolleston, Glenis Patricia Reeve, Stephen Paul Fleet, Bronwyn Fleet, Geoffrey T Fleet, Dawn Elsie Tuhakaraina, Margaret Tuhakaraina, the late Paku Gordon Edwards, the late Christina Rolleston, the late Raymond J Fleet, and the late Adriana Gerrard on behalf of Ngāti Muriwai Hapu; (Wai 2160)

MEMORANDUM OF COUNSEL

17 Hakihea | 17 December 2025

NGĀTAHI LAW

RECEIVED

Waitangi Tribunal

18 Dec 2025

Ministry of Justice
WELLINGTON

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Tēnā e Te Rōpū Whakamana i Te Tiriti o Waitangi

1. Introduction

1. This Memorandum-Counsel is filed on behalf of the following Whakatōhea claimant communities:

- **Wai 87:** The late Claude Edwards and Adriana Sylvia Edwards, for and on behalf of Whakatōhea iwi and hapū;
- **Wai 1794:** Muriwai Wehi, William Smith, and Aden Webb, on behalf of Tūranga Pikitoi Hapū (the claimants)
- **Wai 2160:** a claim by John Robert Edwards, Alexander Joseph Edwards, Frank Porter, Adriana Sylvia Edwards, Theresa Patricia McMurtrie, Ruth Gage, Georgina Hope Fleet, Eva Edwards, Tony Rolleston, Glenis Patricia Reeve, Stephen Paul Fleet, Bronwyn Fleet, Geoffrey T Fleet, Dawn Elsie Tuhakaraina, Margaret Tuhakaraina, the late Paku Gordon Edwards, the late Christina Rolleston, the late Raymond J Fleet, and the late Adriana Gerrard on behalf of Ngāti Muriwai Hapu;
(the claimants)

2. Pursuant to the Presiding Officer’s memorandum-directions¹(MoD) dated 20 November 2025, directed submissions be filed by 5pm 17 December 2025 on a number of evidential and procedural matters as set out below;

- a) update the Tribunal on progress of commissioning research (Wai #3555);²
- b) general maps of use to all parties which show general geographical and topographical features³ the relationship of the areas of interest to each other and to the block boundaries.

¹ *Waitangi Tribunal, Memorandum of Directions, #2.5.15, Waipāoa Remedies, Wai 3555, 20 November 2025*

² At [80]

³ At [87]

Submissions on Directed Matters;

3. Wai 87, Wai 1794, Wai 2160 (the claimants) through Ngati Muriwai Authority Trust (NMAT) are Crown Forest (Rental Trust) Licenced Lands (CFL) approved clients for the purposes of funding to participate in the Waitangi Tribunal Waipaoa Remedies Inquiry, (Wai 3555).
4. The claimants have engaged with CFL officials regarding commissioning of an Expert Historian, the assembly of a Historical report and determination of a targeted date for report delivery.
5. A Historian (Paul Husband) has instructed NMAT counsel of his availability to begin assembly of a Waipaoa Historical Report 19 January 2026 with an estimated delivery time 19th June 2026. Mr Husband does have other commitments within the same time frame but has given an undertaking to deliver the report on time.
6. Oral and Traditional evidence. Several claimant witnesses' have agreed to provide evidence in relation to Waipaoa rohe and its surrounds. The start date of 19 January 2026 as requested by witnesses for oral and traditional evidence gathering. Delivery time for filing such evidence is sought, May 15th 2026.
7. **Mapping:** Counsel support a Joint Counsel-Crown Memorandum filing a Generic Mapping bundle relative to the Waipaoa Mangatu inquiry rohe. Counsel submits that in addition to the general bundle, specific mapping of witnesses' areas of interest and their block boundaries, identifying cultural and customary resources and habitat shall be collated to accompany their oral and traditional evidence. The Historians report shall also provide mapping specific evidence targeted to particular places and tribal groups. Specific mapping as provided during the assembly of claimants research.

8. **Site Visit:** Counsel as instructed submits that a site visit to Waipaoa during summer months is extremely preferable, despite the visit may not necessarily coincide with a hearing week. Counsel submits a site visit without an accompanying hearing week is a matter the Tribunal could consider if in fact a hearing is to take place mid-2026. The claimants have traversed inland to Waipaoa having a witness ‘guide’ knowledgeable in best-practice logging truck roadway movements from Waihua Toatoa to Waipaoa. Winter not being an option for a site visit Counsel provide a summer option (without a hearing) for the Tribunal’s consideration

17 Hakihea | 17 December 2025



Tony Sinclair Brett Cunningham Michael Sharp
Counsel for the Claimants