OFFICIAL

Wai 49, #2.29
Wai 682, #2.105
Wai 1464, #3.1.34
Wai 1546, #3.1.33
Wai 3503, #3.1.13

KEI MUA I TE ROOPUU WHAKAMANA
I TE TIRITI O WAITANGI

IN THE WAITANGI TRIBUNAL
OF NEW ZEALAND

WAI 1456
WAI 2332

IN THE MATTER	of the Treaty of Waitangi Act 1975
AND	
IN THE MATTER	of the Remaining Historical Claims Inquiry
AND	
IN THE MATTER	of a claim by Gary Meroiti and Julian Wilcox on behalf of the past and present Māori students of **Te Aute College** (except those affiliated with Heretaunga-Tamatea), Dallas James Seymour and Tekou Rikirangi Gage on behalf of the past and present Māori students of **St Stephen's School**, and Robin Hapi and Robert (Tata) Lawton on behalf of the past and present Māori students of **Hato Paora College**

MEMORANDUM OF COUNSEL SEEKING INTERESTED PARTY STATUS IN THE WAI 3503 URGENT INQUIRY

Dated 22 December 2025

RECEIVED
Waitangi Tribunal
22 Dec 2025
Ministry of Justice
WELLINGTON

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MAY IT PLEASE THE TRIBUNAL

1. This Memorandum of Counsel is filed on behalf of:

   (a) Gary Meroiti and Julian Wilcox on behalf of **Te Aute College**, the past and present Māori students of **Te Aute College** and their whānau (except those affiliated with Heretaunga-Tamatea) and Māori of Aotearoa; and

   (b) Dallas James Seymour and Tekou Rikirangi Gage on behalf of the past and present Māori students of **St Stephen's School**, their whānau and Māori of Aotearoa; and

   (c) Robin Michael Hapi and Robert Charles Tata Kerehi Roera Lawton on behalf of the past and present Māori students of **Hato Paora College**, their whānau and Māori of Aotearoa.

   (the **Claimants**).

2. The Claims are supported by Tā Hirini Moko Mead as whakaruruhau for Te Aute College, St Stephen's School and Hato Paora College, who are collectively referred to as "**Te Tāhuhu ki te Rangi**". The Claimants are all past students of Te Tāhuhu ki te Rangi.

3. On 15 December 2025, her Honour Judge Mullins directed any interested parties to respond to the applications for an urgent inquiry into Crown actions relating to amendments to the Education and Training Act 2020 and the reset of the national curriculum, Te Mātaiaho, by no later than **midday, Monday 22 December 2025**.[1]

4. The Claimants support the applications for an urgent inquiry and seek to participate as an interested party to these proceedings.

Interested Party Status

5. The Claimants seek to participate in the Wai 3503 urgent inquiry not only to protect their direct and significant interests, but also to offer their unique insights and experience for the benefit of the Tribunal and all parties.

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[1] Memorandum-directions of the Presiding Officer regarding next steps for the Wai 3503 urgent application dated 15 December 2025 (Wai 3503 #2.5.2) at [12]

6. As representatives of Te Tāhuhu ki te Rangi (Te Aute College, St Stephen's School, and Hato Paora College), the Claimants have a deep, lived understanding of the ongoing impacts of Crown actions and omissions in education policy, particularly as they relate to Māori boarding schools. The impact of further changes to legislation and the curriculum will directly affect Te Tāhuhu ki te Rangi.

7. The Claimants' interests are distinct from those of the general public. Te Tāhuhu ki te Rangi are directly affected by recent legislative changes - including amendments to the Education and Training Act 2020 and the reset of Te Mātaiaho - which fail to protect, preserve, and promote mātauranga Māori, reo, tikanga, and kawa within the education system.

8. The Claimants believe that their participation will assist the Tribunal by:

   (a) providing a unique perspective regarding the effects of the legislative changes and education policy on Māori boarding schools;

   (b) offering practical insight into the impact of legislative changes and policies which have adversely shaped educational outcomes for Māori students within boarding schools; and

   (c) ensuring that any recommendations or findings are informed by those most directly affected, so that future solutions are equitable, and enduring.

9. The Claimants are committed to working constructively with the Tribunal and other parties to the extent appropriate in respect of this Tribunal process.

Dated 22 December 2025

R Siciliano / P Rawiri
Counsel for the Claimants