

IN THE WAITANGI TRIBUNAL

WAI 3300

WAI 3349

CONCERNING

the Treaty of Waitangi Act 1975

AND

Tomokia ngā tatau o
Matangireia – the Constitutional
Kaupapa Inquiry

IN THE MATTER OF

A claim by Janice Panoho and
Georgina Kerr on behalf of
kaimahi Māori members of Te
Pukenga Here Tikanga Mahi,
the New Zealand Public
Service Association (Wai 3349)

**MEMORANDUM OF COUNSEL FILING CONSTITUTIONAL ISSUES RAISED IN
STATEMENT OF POSITION**

Dated this 27th day of January 2026

RECEIVED

Waitangi Tribunal

27 Jan 26

Ministry of Justice
WELLINGTON

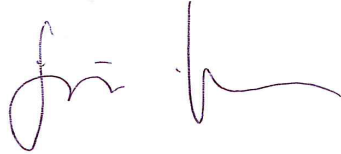


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MAY IT PLEASE THE TRIBUNAL:

1. This memorandum of counsel is filed on behalf of Wai 3349, a claim brought by Janice Panoho (Kaihautū) and Georgina Kerr (Kuia and Māngai) on behalf of kaimahi Māori members of Te Pūkenga Here Tikanga Mahi - the New Zealand Public Service Association (PSA).
2. By Memorandum of Directions dated 19 December 2025 her Honour Kaiwhakawā Matua Fox directed Counsel to file a written explanation of the constitutional issues raised in the claimants' statement of position presented by Mrs Georgina Kerr, Kuia and Māngai (Wai 3300, #B55) by 5pm Tuesday 27 January 2026.¹
3. Accordingly, this memorandum accompanies for filing an explanation of constitutional issues raised in the claimants' statement of position.

DATED this 27th day of January 2026



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T Te Whenua
Claimant Counsel

¹ Wai 3300, #2.6.79.