IN THE WAITANGI TRIBUNAL

WAI 1750
Wai 78

IN THE MATTER OF	**the Treaty of Waitangi Act 1975**
AND	
IN THE MATTER OF	**the North-Eastern Bay of Plenty District Inquiry**
AND	
IN THE MATTER OF	**a claim by Lucy Steel, Kaareen Hotereni and Ruahine Te Moana brought on behalf of Ngāi Tai (WAI 78)**

MEMORANDUM OF COUNSEL FOR WAI 78

Dated this 24th day of March 2026

RECEIVED
Waitangi Tribunal
24 Mar 26
Ministry of Justice
WELLINGTON

Oranganui Legal

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MAY IT PLEASE THE TRIBUNAL

Introduction

1. This memorandum of counsel is filed on behalf of Wai 78, a claim brought on behalf of Ngāi Tai.

2. On 11 March 2026, His Honour Judge Doogan confirmed a judicial conference would be convened during hearing week eight of the North-Eastern Bay of Plenty (Wai 1750) District Inquiry, and that parties should be prepared to discuss hearing planning matters.[1]

Crown Forestry Rental Trust

3. In anticipation of the judicial conference, counsel advises that the Wai 78 claimants are not in a position to become approved clients of Crown Forestry Rental Trust (CFRT), and are therefore unable to access CFRT funding for technical research, a hearing venue and associated costs.

4. To become approved clients of CFRT, the named claimants must agree on the entity that will act as the client and receive the putea. The Wai 78 claimants have been unable to reach an agreement on this matter and therefore unable to apply for CFRT funding.

[1] Wai 1750, #2.6.057, *Memorandum-Directions of the Presiding Officer Following Hearing Seven* (11 March 2026).

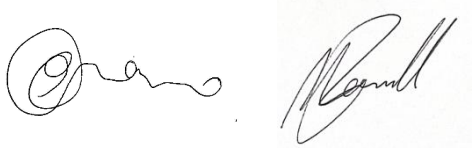
Tribunal Funding

5. Counsel respectfully seeks Tribunal assistance for the commission of a Ngai Tai technical report for the purposes of the Wai 1750 inquiry, together with funding for associated hearing costs.

6. Counsel advises that a similar funding request will be made to the Waipāoa Remedies Inquiry, in which Ngai Tai also participate. It is envisaged that a consolidated research report addressing both inquiries could be prepared in the interests of cost and time efficiency.

7. Counsel is available to address this kaupapa at the upcoming judicial conference during hearing week eight of the Wai 1750 inquiry.

DATED at Maromahue Marae this 24th day of March 2026



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Eve Kahuwaero Rongo and Meg Lamont-Russell
Counsel for Wai 78