

Appendix A**POST-HEARING QUESTIONS IN WRITING FROM DR G PHILLIPSON, April 2026****Questions in writing for Prof Michael Belgrave (Wai 2200, #A254(a))**

1. Pages 124-134: Did the Ngāti Apa witnesses only acknowledge ‘twos and threes’, as stated in paragraph 467, or was there an acceptance that larger numbers settled?
2. Para 514: Was Paramena Te Naunau a Ngāti Raukawa witness? Please check.
3. Para 520: What were the alleged ‘three acts of perjury’, and please provide more details about this 1866 case?
4. Para 555: As discussed at the hearing, please explain further the basis for Dr Grant Young’s argument about equity and why it applies to this decision. Also, please provide a specific reference to the relevant page or pages in Dr Young’s thesis where this argument is explained.
5. Did the assessor question witnesses in the Himatangi case? Please provide details. Who were the assessors in the cases of 1868, 1869, 1872, and 1873? Did they play a significant role in the proceedings?
6. Para 571: Where was Rekereke?
7. What did Horomena Toremi say about his tribal and hapū affiliations on the occasions at which he gave evidence in the various hearings? Re para 474, who were Te Patutukituki, and should ‘Whakane’ be ‘Whakaue’?
8. Para 582: an ‘attempt to make peace’ at the Battle of Waiorua – an attempt by whom? Which side made this attempt?
9. Para 595: ‘He described Ngāti Apa as being in servitude, whereas in 1868, he had said Ngāti Apa had been in a degraded condition before Christianity, at the second hearing he did not say Ngāti Apa were in servitude.’ This sentence does not make sense. Please clarify.
10. Does the evidence you’ve reviewed for this report in the court minutes discuss or refer to chiefly marriages between Ngāti Raukawa and Muaūpoko (such as the marriage between Te Rangihaeata and Te Pikinga for Ngāti Apa)? If it does, please provide as much information as possible about those marriages, when they occurred, and any peace-making arrangements that were involved in the marriages.
11. Para 624: What did Ropata Hurumutu say about his tribal and hapū affiliations on the various occasions in which he gave evidence for the cases discussed in this report?

12. Para 626: When you say that Maning was ‘ignoring evidence that Muaūpoko did have rights north of the Manawatū’, please specify what evidence at the 1869 hearing that Maning was ignoring. Please provide details.
13. Para 630: Please explain the evidence of Ngāti Kauwhata’s ‘peaceful negotiation and treaty’.
14. Para 862: Who was Mitai?
15. Hakaraia Rangipouri’s section starts at para 1001 but then you bring Te Aweawe as the speaker in paras 1005 and 1007. Then, in para 1008, you state ‘He noted...’. I am not sure which ‘he’ you are referring to. Then, Peti Te Aweawe’s section starts at para 1014 but at para 1023, you state ‘According to Hakaraia...’ Then, at para 1027, you state ‘Rangipouri’s evidence is significant...’ Please clarify.
16. Footnote 505: Please file these two pages.
17. At the hearing, you referred to the applications for title for Manawatu-Kukutauaki and your understanding of what is in those applications – please file copies of these applications.
18. As discussed at the hearing, please explain the detail of your view that the 20,000 acres said to have been set aside for Muaūpoko was probably about 7,000 acres in reality (a view which you came to after writing your report).
19. Para 1049: ‘he said that he had not heard any complaint ... However, it was not true that the other two tribes and not complained...’ Did Ihakara say both of these things? This is confusing.
20. Para 1138: Who was Kikohoterangi?
21. Para 1174: When you say ‘conquered by him’, did this mean Te Rauparaha or Henare Te Herekau?
22. Para 1194: Is this quotation from Toremi and not from Henare Te Herekau? It is unclear and there are no footnotes to enable it to be checked.
23. Para 1205: Could the discussion about a ‘small piece’ in 1842 refer to the New Zealand Company transaction?
24. Para 1234: Who was Hiromarama?
25. Page 337: Where was this Porokaiaia block?
26. Page 355: What are the two vertical lines on this map (ML4903)? What does the text say (the version in the report is too blurry to read)?

27. At the hearing, you referred to Te Keepa's complaints about the payment of advances on the Manawatu-Kukutauaki block, which you did not discuss in your report. Please explain this further and provide relevant extracts.
28. Re 'mana agreements' – you did not use this term in your report but you used it several times when giving your evidence. In response to an oral question from the Tribunal you said that the term in the minute books was 'peace making'. Please provide specific examples of how the term 'peace making' is used in the minutes to illustrate your point.
29. Para 1285: 'In 1824, Te Pēhi Kupe needed to go away to get guns, to take utu for the deaths of his children.' Please clarify who said this in the court with a reference.
30. At the hearing, you stated that the exchange and arrangement between Taueki and Te Whatanui was not referred to at the Horowhenua hearings in 1873. Do you have an explanation of why it was referred to in 1871 (the Travers inquiry) and the 1890s but not in 1873?
31. Paras 1426-1427: Is the quotation in para 1426 (and para 2457) from the 1873 minutes? Please provide a reference. As discussed at the hearing, please provide as full an explanation as possible as to when and how the court decided on the boundaries of the Horowhenua block, on what date the court advised parties of this, who was present, and when and how these were depicted on a plan for the hearing. Also, did the boundaries described in para 1426 become the actual boundaries of the Horowhenua block?
32. Para 1516: 'The Court had already made it unnecessary to counter the argument that any interest they had had been conferred on them by Te Whatanui.' Please explain.
33. Para 1538: You say that there is a 'tendency' to see witnesses as 'lying' but that this is 'more readily explained as an attempt to locate memory and experience in the imperatives created by the Court'. What does this mean? Please explain further.
34. Para 1603: Who was Wiki Tauteka's father? You say 'the evidence was at variance with her father's evidence'.
35. Para 1654: Did the whole court go on the site visit or just the assessor? It was often just the assessor.
36. Please file copies of the documents referenced at footnotes 654, 656, and 657.
37. Para 1666: What is the reference for the second half of the paragraph, including the quotation that 'no locality was fixed upon'?
38. For the Manawatu-Kukutuaki hearing, was there strong evidence of Muaūpoko occupation outside of the Horowhenua block (where you say the evidence was strong)?

39. Did you locate a Native Land Court decision for Tuwhakatupua? If so, please file a copy.
40. Para 1674: Section 28 begins in para 1674 with the statement: ‘In 1891 Kipa Te Whatanui appeared in support of this petition.’ Appeared where? What was the petition? Is there text missing here? There are no references. Please explain and file a copy of the petition.
41. Para 1683: ‘Keepa had the opportunity to ask Kipa...’ What was Te Keepa’s role here? Why was he able to ask questions?
42. Para 1696: ‘One of the most important things to take from the 1891 inquiry is the very different response of the committee to the petition.’ Please explain this statement. What was the committee’s decision in 1891 (you have not said)? What was it ‘very different’ from and why?
43. Section 29 on the 1892 Legislative Council committee: This section is very unclear, especially paragraph 1699. What was petition number 12 of 1890? Please file a copy. Was this the same petition as examined in 1891? What did the committee say in its report? You have cut this very short and moved straight on to your conclusion (paras 1707-1708), which is difficult to understand given the gaps in sections 28 and 29.
44. Para 1727: Please explain this paragraph. The purpose of the court under the native land legislation was not to empower the ‘authority of the hapū to act collectively’, so I do not understand your argument here.
45. Para 1728: Please explain how the commission was influenced by a ‘public relations battle’: what is your specific evidence for drawing this conclusion? What was the public relations ‘campaign’? Is this a reference to the 1891-92 petitions and Legislative Council committee inquiries? Who do you say were the ‘European advocates’ in this 1890s public relations campaign? This needs further explanation.
46. Paras 1733-1736: Is there any evidence that the commission had read Travers’ or White’s books? Were these books provided in the evidence to the commission? Is there specific reference to them in the report or the minutes? Please provide references. It is not clear on what basis you say this and it is important to clarify.
47. Para 1763: You note the two agreements in 1874 – do you know why an agreement was not made at the same time with Ngāti Huia in the north? Do you have an explanation for that, given what Te Keepa said about Ngāti Huia at the Horowhenua commission in para 1747? Are you able to shed more light on the events about the definition of the northern boundary described by Te Keepa in paras 1746-1748?
48. Para 1847: Have you seen evidence about where in the inquiry district Karekare was located?

49. Para 1868: You say that the major differences between Wirihana Hunia's narrative and earlier Muaūpoko narratives 'flowed from the purpose of the narrative before the Commission'. Please explain what you mean by this statement.
50. Para 1885: You mean Ngāti Apa here, not Ngāti Awa?
51. Para 1978: 'While on the one hand ..., *he was also explaining that Muaūpoko had retained an ongoing obligation to Te Whatanui, and his descendants, therefore retaining their own mana, and with no need to be beholden to Ngāti Raukawa more generally. Such an argument indicated that Muaūpoko, on their part, only owed responsibility to Te Whatanui and his descendants.*' I understand that this is your argument in this report, but are you putting words in Wilson's mouth? Did Wilson actually say these things? With no footnotes, there is no way of checking this, but please have another look at what Wilson said and clarify whether the italicised text from 'he was explaining' onwards is your interpretation or an account of what Wilson actually said.
52. Para 1985: Do you mean that Stevens switched from representing Hunia to representing Ngāti Raukawa? Please explain.
53. Page 479: What is the Appellate Court case being asked about here in [39]?
54. Page 480: Do you think 'Matti' was supposed to be Raumatangi [at 40]?
55. Para 2019: Are the first five lines of this paragraph an interpolation of your questions with the quotation then carrying on? It is unclear why this text appears in the middle of the quotation.
56. Did the proceedings of the Horowhenua commission shed more light on how, when, and why the boundaries of the Horowhenua block were decided?
57. Para 2199: Why did the commission come to this view about conquest? How did it reach that view?
58. Para 2205: 'Nor can its findings be seen as vindication of Kipa Te Whatanui's historical narrative, as he presented it to the Committee, be seen as a vindication of Ngāti Raukawa's case as it had been presented by others to this point.' The meaning of this statement is unclear – can you please explain it further.
59. Para 2222: What is your evidence that Buller's account was influenced by Travers, as you seem to say here? This seems unlikely on the face of it, given Buller's own knowledge and experience in the district.
60. Para 2225: Here you say Kipa Te Whatanui was married to Te Keepa's daughter and acted as his secretary. Earlier, at para 2110, you said that Ru Rewiti was married to Te Keepa's daughter and acted as his secretary. Please clarify this point. What is your source for this? Also, in para 2225, you state that Kipa Te Whatanui's connections with

Te Keepa and Buller ‘played an important background role in these proceedings’. Please clarify what this role was and what the evidence is in support of this statement.

61. Para 2207: Is there any specific evidence of bias on the part of Henry Williams Jr? Do you know if the rules of the Native Affairs Committee or other select committees precluded a relation to a member of the committee giving evidence?
62. Para 2245: Is this the first appearance in the narrative of the allegation that Te Keepa intimidated the court by a show of military force? Had this allegation been raised prior to this select committee inquiry in 1897?
63. Para 2246: ‘All he had to do was withdraw from the Court’ – he tried this in 1872 and failed. Was it safe for Muaūpoko to do so in 1873 when they had lost in Manawatu-Kukutauaki? What could have been the consequences of withdrawing from the court in 1873?
64. Do you have a copy of the petition considered by the Legislative Council in section 31 of your report? If so, please file a copy.
65. Para 2310: Please explain this discussion of boundaries.
66. Para 2319: Please explain further why this was a ‘smoking gun’? Do you know why the committee did not call Buller to explain himself?
67. Para 2356: Te Keepa said that he was ‘living there at the time’, presumably referring to the time of the New Zealand Company transaction. Did you see other references to Te Keepa residing at Horowhenua for periods of time prior to the 1860s – 1870s, when Muaūpoko rangatira requested his intervention?
68. Para 2391: Ihakara Tukumarū and his brother Kereopa gave evidence for the sellers in 1868, not the non-sellers?
69. Para 2440: Which petition does this refer to?
70. Para 2451: Which particular boundaries are being referred to here as identified in the 1872 gazette?
71. Para 2453: What do you mean by a ‘huge weight of evidence’ here? Please explain.
72. Para 2588: This is your second reference to a ‘smoking gun’ (a different one this time). Please explain why this was a ‘smoking gun’ and why you think the Appellate Court was wrong to consider it a ‘smoking gun’?
73. Re your presentation summary (doc A254(b)), what is your considered answer to the ‘overarching question’ you posed in paragraph 3 of your summary: ‘Do these divided historical narratives reflect the intensity of the events which surrounded these

migrations or did they emerge as a response to the Crown's actions? Did the Crown's purchasing regime and the Native Land Court title system create new conflicts, which in turn generated the divided histories that have come down to the present?'

Questions in writing for Paul Meredith (Wai 2200, #A253)

1. Para 103: As discussed at the hearing, do you have any references for the use of 'mana huihui' to illustrate how this term has been used?
2. Para 148: 'This example serves as a cautionary illustration of the fundamental danger of interpreting tikanga through a Eurocentric lens with its power to distort and decontextualise.' How does it when the sources you cited were Iwi Nicholson, Wayne Kiriona, and Matene Te Whiwhi? Please explain what you mean here.
3. Pages 50-53: What is the definition or explanation of what take raupatu is, based on the evidence in this inquiry and your own knowledge and previous research?
4. Pages 57-59: How do you see the concepts of take tupuna applying to recently migrated tribes? Did ancestral connections to land and resources evolve quickly in a new rohe within a generation? Were new names added to the landscape or old names changed?
5. Para 191: What is 'ahi pakaurere'?
6. Para 275: How was Waitohi's invitation to Ngāti Raukawa an 'invitation to participate in a broader peace-making project'? What do you mean by this? What is the evidence for it? Please check the references for this statement.
7. Pages 92-94: re your section on moenga rangatira or peace-making marriages or marriage alliances: did you find evidence of such chiefly marriages between Ngāti Raukawa and Muaūpoko? Please provide details of any such marriages, when they occurred, and any peace-making arrangements that accompanied them.
8. Para 293: Which Te Whatanui married Riria Te Hurumutu?
9. Please file copies of the letters you referred to from Ngata to Buck (re conquest), the Rapata Wahawaha letter to Elsdon Best (re take ahi kaa), the letter from assessors to the newspapers about the Native Land Court and ahi kaa, and the 1861 document about rūnanga.
10. As discussed at the hearing, what definition of 'kaitiakitanga' do you think could be used in legislation rather than or as well as 'stewardship' (this can be in Māori as well as English)?
11. Para 521: Please explain your concerns further here, including the 'eleven matters' that had to be considered. You refer to the Historic Places Act 1993 – has the Heritage

New Zealand Pouhere Taonga Act 2014 addressed some of these issues or improved the situation?

12. In terms of part 3 of your report ('Tikanga Māori in Lex Aotearoa), what more do you think needs to be done to improve the representation or embedding of tikanga in Lex Aotearoa and ensure its effectiveness? Do you have any specific suggestions?