I TE RŌPU WHAKAMANA
I TE TIRITI O WAITANGI

WAI 3553

KEI RARO I TE MANA o te ture o te Tiriti o Waitangi 1975

I TE TAKE O te ruku tātari ohotata, te Education and Training Amendment Act me Te Mātaiaho

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HE MANATU RŌIA

I tēnei rā, i te 17 o Paengawhāwhā 2026

RECEIVED
Waitangi Tribunal
17 Apr 26
Ministry of Justice
WELLINGTON

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Ngā rōia

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Jessica Hita

TĒNĀ, E TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI:

Introduction

1. This Memorandum of Counsel is filed on behalf of counsel participating in the Wai 3553 – Education and Training Amendment Act and Te Mātaiaho Urgent Inquiry.

2. During the judicial conference held on 17 April 2026, counsel agreed to file an amended statement of issues.

3. Accordingly, attached at **Appendix A** is a draft revised Statement of Issues.

4. Counsel has conferred with Crown counsel on the proposed amendments, who have indicated agreement to their inclusion.

I TĒNEI RĀ, i Kirikiriroa, te rā, 17 o Paengawhāwhā 2026

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Dr Season-Mary Downs/Chelsea Terei-Tipene/Jessica Hita
On behalf of claimant counsel