IN THE WAITANGI TRIBUNAL OF NEW ZEALAND	WAI 2357 WAI 2358
IN THE MATTER OF	The Treaty of Waitangi Act 1975
AND	
IN THE MATTER OF	Applications for urgency hearings by Sir Graham Latimer, Tom Murray, Taipari Munroe, Kereama Pene, Rangimahuta Easthope, Peter Clarke, Jocelyn rameka, Eugene Henare, Nuki Alreidge, Ani Martin, Ron Wihongi, Eric hodge, Walter Rika, Emily Rameka, Maanu Paul, Charles White and Whatarangi Winiata.

MEMORANDUM OF COUNSEL FOR TE MATEAWA, TE ITI O MAHUTA, NGATI WHAWHAKIA KI AOTEA, TOTO WHANAU, NGATI PAOA, NGA URI O WETINI MAHIKAI AND NGA URI O RANGATIRA MOETARA

29 FEBRUARY 2012

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Waitangi Tribunal
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Ministry of Justice
WELLINGTON

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MAY IT PLEASE THE TRIBUNAL:

1 This memorandum is filed on behalf of Te iti o Mahuta (Taharoa and Kawhia), Ngati Whawhakia ki Aotea (Aotea), Te Mateawa (Horowhenua), Nga Uri o Wetini Mahikai (Raglan), Ngati Paoa (Hauraki), Toto Whanau (Wairarapa, East Coast, Waikato and King Country), Nga Uri o Hetaraka Takapuna (North Shore, Mahurangi and the Gulf Islands) and Nga Uri o Rangatira Moetara (Pakanae and Waimamaku).

2 The above claimants assert that proprietary rights, interests and responsibility in and for natural resources resided, and continue to reside, with hapu and whanau. They further assert that the Crown has guaranteed to actively protect the proprietary rights, interests and responsibility in and for natural resources through Te Tiriti o Waitangi and the Treaty of Waitangi.

3 All of the above claimants assert control over all of the aquifiers, reservioirs, waterways (underground and overland), lakes and other bodies of water within their respective rohe including (but not restricted to):

4 Te iti o Mahuta:

4.1 Taharoa Lakes;

4.2 Te Puia Springs (geothermal)

5 Ngati Whawhakia ki Aotea:

5.1 Aotea stream;

6 Te Mateawa:

6.1 Ohau River;

7 Nga Uri o Wetini Mahikai:

7.1 Riki Spring;

8 Ngati Paoa:

8.1 Te Tapapakanga o Puku;

8.2 Pukorokoro (geothermal);

9 Toto Whanau:

9.1 Awaroa River;

10 Nga Uri o Hetaraka Takapuna:

10.1 Lake Pupuke;

11 Nga Uri o Rangatira Moetara

11.1 Waiotemarama Stream;

12 There has been no specific engagement with either the claimants, the whanau or hapu who they represent, concerning the extent of their proprietary rights in the water and/or geothermal resources within their respective rohe.

13 The claimants on whose behalf this memorandum is filed support the applications that have been made.

Dated at Auckland this 29th day of February 2012

Stephen Potter / Tania Tarawa
Counsel