BEFORE THE WAITANGI TRIBUNAL **WAI 329, WAI 1584**
TE ROOPU WHAKAMANA I TE TIRITI O WAITANGI **WAI 898**

IN THE MATTER of the Treaty of Waitangi Act 1975

AND

IN THE MATTER of the Te Rohe Potae Inquiry

AND

IN THE MATTER of a claim by Daniel Te Kanawa, Thomas Moke, and Haami Bell on behalf of themselves and iwi of the Maniapoto region (Wai 329)

AND

IN THE MATTER of a claim by Roderick Tiwha Bell on behalf of himself and all marae, iwi and hapu of Maniapoto (Wai 1584)

MEMORANDUM OF COUNSEL FOR WAI 329 AND WAI 1584:
FOLLOW UP EVIDENCE FROM HEARING WEEK TWELVE
Dated this 14th day of July 2014

RECEIVED
Waitangi Tribunal
14 Jul 2014
Ministry of Justice
WELLINGTON

KAHUI LEGAL

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MAY IT PLEASE THE TRIBUNAL:

1. This memorandum is filed on behalf of the Wai 329 and Wai 1584 claims brought on behalf of the Maniapoto Maori Trust Board (the **Trust Board**). This memorandum is filed in response to the Memorandum-Directions of His Honour Judge Ambler dated 20 May 2014 (Wai 898, #2.6.67) directing parties to file questions and responses in respect of claimant evidence presented during hearing week twelve at Oparure Marae.

2. By memorandum of counsel dated 16 June 2014 the Crown filed questions for Ms Janise Eketone in respect of her brief of evidence (Wai 898, #S4), and in particular, the Crown asked:

> *At the hearing on 9 May 2014, you undertook to clarify whether the tables in the Maniapoto Hauora-Health Report 2009, (Wai 898, S4(b)), presented national date or data at a DHB or TLA level. Would you please provide that information?*

3. Counsel attaches as **Appendix A** a table which sets out the various tables and diagrams throughout the Maniapoto Hauora-Health Report 2009 (Wai 898, #S4(b)) and addresses the Crown's question.

4. Counsel has also been instructed that some statistical information that was provided to the Trust Board in respect of the 2013 Census data was incorrect. This particularly relates to the evidence of Mr Daniel Te Kanawa (Wai 898, #S19(d)), and slide 11 of that presentation – "Comparison of Maniapoto v New Zealand Average Incomes: 2013 Census". Counsel is instructed that the information initially provided to the Trust Board by Statistics New Zealand had grouped several income bands resulting in increased margins of error when applying the formulas to determine gross outcomes. Attached as **Appendix B** is an amended slide 11.

5. The key difference is the total Maniapoto annual income ($639,217,500) and the average annual income ($29,406) (being the last two columns of the table). Therefore, the differential between Maniapoto and the New Zealand average is $199,568,391, which is a 29% difference, compared with the 42% difference derived from the initial data provided.

DATED at Wellington this 14th day of July 2014.

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M K Mahuika/K T Mahutariki
Counsel for Wai 329 and Wai 1584