

**IN THE WAITANGI TRIBUNAL
KEI MUA I TE ROOPU WHAKAMANA I TE TIRITI O WAITANGI**

WAI 2490

IN THE MATTER OF the Treaty of Waitangi
Act 1975

AND

IN THE MATTER OF A claim by Paki Pirihī on
behalf of Patuharakeke te
Iwi

AND

IN THE MATTER OF The Ngāpuhi Mandate
Inquiry

BRIEF OF EVIDENCE OF DR GUY GUDEx

Dated this 7th day of November 2014

RECEIVED

Waitangi Tribunal

7 Nov 2014

Ministry of Justice
WELLINGTON

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Introduction

1. I am a member of the Patuharakeke Te Iwi Trust Board ("**PTB**") Waitangi Claims subcommittee. For the past 15 years I have researched land alienation in the rohe.
2. I am 56 years old and of European descent. My children are Patuharakeke through my wife Daryn Gourlay,

Motatau and Te Kamo begat Te Taotahi who begat Te Whakaariki who begat Te Pirihi Whakaariki who begat Wiki Te Pirihi who begat Paki Pirihi who begat Hurikino Paki Pirihi who begat Ruve Gell Pirihi who begat Daryn Gourlay who begat Te Pirihi Isaac, Joseph Paki, Georgia Donna Maria, Maia Theresa Gabriela, Gabriela Rosa Terina and TakuManawa Guy Noah.

3. I graduated from the University of Auckland in 1981 with a Bachelor of Medicine and Bachelor of Surgery and I am a Fellow of the Royal Australasian College of Obstetrics and Gynaecology. In 1998 I attained certification as a subspecialist in Reproductive Endocrinology and Infertility.
4. I have previously presented evidence to the Waitangi Tribunal in the Wai 1040 Te Paparahi o te Raki District Inquiry Stage 2 hearings in October 2013.

Background

5. I provide this evidence in support of the application by PTB for an urgent inquiry into the Crown's recognition of the Tuhoronuku Deed of Mandate.
6. The mana and mana whenua of Patuharakeke have been usurped by the Crown during the Tuhoronuku mandating process by the inclusion of their Wai claims in the Deed of Mandate without their consent.
7. PTB has a mandate from the Patuharakeke claimant community to facilitate the tikanga based settlement of their historical and

contemporary grievances and there is widespread support within the Patuharakeke claimant community. There is no other claimant group purporting to represent Patuharakeke.

8. There has been no consultation with PTB by Tuhoronuku or the Crown over the inclusion of Wai 745 in the Deed of Mandate.
9. The Crown's actions in this matter have further marginalised Patuharakeke, a process started in 1845 with the confiscation of Te Poupouwhenua.
10. Patuharakeke has always acknowledged and respected its affiliation to Ngapuhi, Ngati Whatua and Ngati Wai.
11. To be clear the objection of PTB is to the total absence of consultation there has been with it as the mandated representative of Patuharakeke and the lack of recognition by the Crown of the specific issues that face Patuharakeke as a large natural grouping occupying the buffer zone between three iwi – a sphere of their own.
12. The lack of consultation with Patuharakeke is even more surprising given that the Crown must fly over or drive through the rohe to meet with northern iwi – Takahiwai marae is 5 minutes off State Highway One
13. The Tribunal has previously acknowledged that consultation with iwi affected and early engagement with opponents of a proposed mandate are minimal requirements for the Crown to meet for the process to be just and fair.
14. The website of the Waitangi Tribunal itself specifies the claims of Patuharakeke,

The Te Paparahi o Te Raki regional inquiry, presided over by Judge Craig Coxhead, currently comprises around 390 claims brought largely by Ngapuhi, Ngati Whatua, Ngati Wai, Ngati Hine, Patuharakeke, Ngati Rehua and Ngati Manuhiri claimants.

15. Furthermore, of the four specific major local issues identified on the website for the Stage 2 regional inquiry, two are within the rohe of Patuharakeke, namely Northport and the Marsden Point Refinery,

Specific local issues including the Port of Whangarei/Northport, Marsden Point Refinery, Hauturu (Little Barrier Island) and Hato Petera College – sale of Crown Lands.

16. The only engagement the Crown has had directly with Patuharakeke was in August 2014, probably prompted in part by the action of PTB earlier filing an application in the High Court of New Zealand for an injunction to prevent the sale by Mighty River Power Ltd (MRP) of surplus s27B memorialised lands that had been part of the Te Poupouwhenua confiscation and in part as a result of enquiries PTB had made with the Office of Treaty Settlements ('OTS') regarding the proposed landbanking of the memorialised lands in question. This lack of engagement is in spite of repeated requests by PTB over a number of years to meet with OTS including a comprehensive letter to Maureen Hickey at the OTS in July 2013 from Tamatekapua Law acting on behalf of PTB reiterating the objection to the inclusion of Patuharakeke Wai Claims in the Tuhoronuku and Ngati Wai settlement proposals. This letter was not acknowledged by OTS.

17. This lack of engagement or consultation with Patuharakeke is in spite of an acknowledgement by Ngati Wai Trust Board representatives at a meeting with PTB in June 2013 that earlier that year there had been a recent meeting between the Crown, Tuhoronuku and Ngati Wai Trust Board with it being minuted that "*the Crown's intention at the meeting was for NTB to acknowledge the areas of shared hapu between Ngati Wai and Nga Puhi so Tuhoronuku could move on to settle, however we pushed back. We acknowledge our whakapapa to you all but also recognise your connection to other iwi.*"¹

¹ Notes of a meeting of the Ngati Wai Trust Board and Patuharakeke held at Rangiora Marae, Takahiwai on Tuesday 11th June 2013 commencing at 6pm.

18. The meeting with OTS took place at Takahiwai on 4th August 2014 with Maureen Hickey and Nigel Fyfe representing the Crown.
19. The intention of OTS with respect to Settlement Negotiations with Patuharakeke are clarified in an internal OTS email dated 4th August forwarded to PTB following a request under the Official Information Act. The email summarises talking points used as a basis for the hui later that day.²
20. It outlines the approach the Crown intends for a "border" large natural grouping,

Settlement Negotiations

Patu Harakeke comes within the scope of three separate mandates : Ngapuhi, Ngatiwai and Ngati Whatua. The Crown has accepted that Tuhoronuku has a mandate on behalf of Ngapuhi, and we are likely to begin negotiations quite soon. The Ngatiwai mandate has been advertised and we have asked for submissions on it. Ngati Whatua has a mandate already.

So Patu Harakeke will be settled as part of the negotiations with each of these mandated authorities.

We have heard that Patu Harakeke wishes to have its own settlement negotiation. We need to be completely clear that a separate negotiation with Patu Harakeke is not within Crown Policy. We will not be accepting a mandate presented by Patu Harakeke to commence settlement negotiations.

The Crown prefers to settle with large natural grouping. Patu Harakeke falls within three such groupings. Each of the mandated groups will negotiate on behalf of Patu Harakeke. Our strong recommendation is that Patu Harakeke engage with each of those

² Email from Fyfe, Nigel to Hickey, Maureen Monday 4 August 2014 8.42 am Patuharakeke Talking Points.

groups about how its interests can be best represented as we go forward in negotiations.

21. Furthermore the lack of consultation with Patuharakeke with respect to the memorialised land is clear. The majority of this parcel of land was from the original Te Poupouwhenua block, the details of the confiscation of this land from Patuharakeke tupuna have been presented to the Stage 2 Inquiry.
22. It is the only part of Te Poupouwhenua that has any chance of being returned to Patuharakeke.
23. Clearly OTS had been engaged for some time with other iwi prior to meeting with PTB regarding land banking for settlement purposes, but not with PTB. In relation to the Marsden Point Lands, OTS writes,

Marsden Point Lands

As we have told the Tribunal, we are engaged with Mighty River Power over the two blocks of land that have s27B memorials. We have approval from the Government to purchase these lots, subject to price, for use in settlements with three groups – Ngapuhi, Ngati Whatua and Ngati Wai. We looked at the other lands as well but we did not take them any further because we consider that those lands are problematic, because of size, location, easements.

24. On 14 February 2014, the Crown agreed to recognise the Tuhoronuku Deed of Mandate. Tuhoronuku had submitted that Deed of Mandate for the purpose of entering into negotiations with the Crown for the comprehensive settlement of all historical claims in Ngapuhi, including that of Patuharakeke.
25. The Crown was aware that Patuharakeke Wai claims had also been included in the Deed of Mandate for Ngati Whatua and in the Draft Deed of Mandate for Ngati Wai.

26. The Crown was well aware that Patuharakeke has not given Tuhoronuku the mandate to settle their historical grievances and that Patuharakeke have been actively seeking to settle their grievances independently.
27. Patuharakeke contends that the Crown in recognizing the Deed of Mandate, in breach of its duties under Te Tiriti o Waitangi, has failed to act fairly and in good faith to Patuharakeke by:
 - 27.1 Failing to act impartially in its recognition of the Tuhoronuku Deed of Mandate;
 - 27.2 Failing to adequately address and or respond to Patuharakeke's concerns over the application of the Crown's large natural grouping policy;
 - 27.3 Failing to address or resolve concerns relating to the Tuhoronuku mandating process, hui and the postal ballot;
 - 27.4 Failing to have due regard to the opposition of Patuharakeke to the Tuhoronuku mandating process and inclusion in the Tuhoronuku Deed of Mandate itself, when it made its decision to recognise the Tuhoronuku Deed of Mandate; and
 - 27.5 Failing to protect the right of Patuharakeke to retain their own mandate to settle their own historical grievances in any settlement negotiation process and withdraw their respective WAI claim numbers.

Mana whenua of Patuharakeke

28. Contemporary Patuharakeke is a large natural grouping whose members descend from the original Patuharakeke lines as well as other hapu including Ngati Tu, Ngati Wharepaia and Whanaupani. Patuharakeke has very significant kinship ties with other neighbouring hapu through intermarriage.
29. The rohe of Patuharakeke encompasses the region recognised as the traditional border lands between NgaPuhi and Ngati Whatua. The

historical role of Patuharakeke as gatekeepers to the North is acknowledged in a Patuharakeke whakatauaaki, which I state as follows with the permission of Patuharakeke kaumatua.

"E toa ana te riri i Ngatiti ,tau ana te marino i te Raki"- "when there is fighting at Ngatiti then the north is calm"

30. The Mana whenua of Patuharakeke derives from the principles of ahi ka, take tupuna and take tukua:
 - 30.1 Patuharakeke are descended from Ngati Ruangaio and Ngai Tahu, the original inhabitants of the rohe.
 - 30.2 Ngati Ruangaio migrated south in the 1760's and later intermarried with Ngai Tahu.
 - 30.3 The primary tupuna of Patuharakeke are Motatau of Ngati Ruangaio and Te Urikuri of Ngai Tahu
 - 30.4 Motatau and his brothers Pukerahi and Puhi were gifted the land at Takahiwai by Tawhiro, the Ngati Ruangaio rangatira. This included the blocks named Mangawhati, Takahiwai, Rangiora and Poupouwhenua and Te Koutu, all north of the Ruakaka river.
 - 30.5 This history and Patuharakeke mana whenua of these blocks was recognised in the Native Land Court during the title investigation into the Papatupu Takahiwai Block in the early 1900's.
 - 30.6 Patuharakeke was named after the killing of Te Taotahi, the son of Motatau in approximately 1775.
31. Motatau had a Pa at Rangiora, Pukerahi at Ngatiti and Puhi at Kouparepahi.
32. In 1840 the Reverend Colenso during his visit to Whangarei recorded Whakaariki, the son of Te Taotahi and grandson of Motatau as a tohunga residing at Takahiwai.

33. Whakaariki married Te Poho, the sister of Motutara whose father was Te Urikuri of Ngai Tahu. This marriage brought together the two primary descent lines of contemporary Patuharakeke.
34. Hence Patuharakeke have lived continuously at Takahiwai for more than 250 years.
35. Patuharakeke have always demonstrated tino rangatiratanga and kaitiakitanga in this rohe and have acknowledged also the overlapping claims of others and its relationship to others. It is Patuharakeke however who has had mana whenua in this rohe as I have described.
36. The alienation of land in the Patuharakeke rohe through Crown action has resulted in less than two percent remaining. The Crown has conceded that iwi in the Whangarei region are virtually landless and that the Crown's failure to ensure sufficient land was retained was a breach of Te Tiriti o Waitangi.

Waitangi Tribunal Claims

37. In 1998 a claim was filed by Joanne Midwood on behalf of Patuharakeke and amended in 2007 replacing Ms Midwood with Mr Paki Pirihi as the named claimant; the claim is registered as Wai 745.
38. In addition to Wai 745, Wai 1308 was registered with the Waitangi Tribunal in 2005, a claim on behalf of the owners of Pukekauri 1B1, 1B2, 1B3, 1B4 and 1B5 and Takahiwai 4C, 4D1, 4E, 7A, 7B2 and 7C.
39. Wai 745 is the comprehensive claim of Patuharakeke and is prosecuted in conjunction with Wai 1308 a claim specific to lands contained within various Pukekauri and Takahiwai blocks compulsorily acquired by the Crown.
40. The comprehensive claim of Patuharakeke was presented before the Te Paparahi o te Raki Waitangi Tribunal on 16 October 2013.

41. Patuharakeke contends that they are entitled to the protections of Te Tiriti o Waitangi/The Treaty of Waitangi and all of its statutory implementations.
42. Patuharakeke has completed detailed historical research with respect to the alienation of land in its rohe and presented this at the Stage 2 hearings. It includes the most grievous form of alienation-raupatu.

Patuharakeke Opposition

43. Patuharakeke has maintained its autonomy throughout the Treaty claim process.
44. Patuharakeke have continuously made clear their position that it has not given a mandate for settlement for its Treaty claims to any other group proceeding with direct negotiation with the Crown. In spite of this the Crown has proceeded with negotiating with iwi groups that have included Patuharakeke claims 504, 745 and 1308 in their Deed- Ngati Whatua, Ngati Wai and Nga Puhi. It is the Crown's view that the historical grievances and Treaty breaches of Patuharakeke will be partially settled by all three iwi.
45. Under the current model of direct settlement the Crown has unilaterally decided to negotiate with "large natural groupings"- iwi or groups of hapu or individual hapu based on what is expedient at the time for the Crown.
46. Patuharakeke has several specific issues that require acknowledgment by the Crown:
 - 46.1 Patuharakeke has distinct claims, history and whakapapa.
 - 46.2 There have been particularly serious Treaty breaches that have contributed to the progressive marginalisation of Patuharakeke.
 - 46.3 The only marae in the rohe of 100.000 acres being at Takahiwai points to the severity of the prejudice to Patuharakeke of the land

alienation. The tribunal has previously found that the relative absence of marae reflects the gravity of the prejudice suffered by the hapu of the district.

46.4 There is significant industrial and commercial development planned in the rohe building on what already exists- all issues that Patuharakeke has to contend with. These include Northport, Marsden City, Marsden Point Oil Refinery .

46.5 Patuharakeke have strong connections to all the neighbouring iwi but exist in a *sphere of their own* – a term coined in the Mohaka ki Ahuriri Waitangi Tribunal Report in 2004. In describing the territory of Ngati Hineuru, Ballara and Scott stated it was,

... a buffer zone between geographical regions, and only a people who could claim relationships with all of those regions could survive there, given the tendency in Maori society to punish the whole of a descent group for the offence of a part, provided they were not kin. Ngati Hineuru was such a people.

Patuharakeke are such a people and by maintaining those relationships that is how they have occupied this rohe for a quarter of a century

47. The current Crown policy was summarised in 2011 by Peter Galvin, Director of OTS at a Treaty Claims Hui,

I think we've got a little bit more sophisticated in how we deal with large natural groupings. I think in the initial days, we used to try to force iwi together and hope that there would be a happy accord of those iwi all the way through. The fundamental point about a large natural group is it's about efficiencies. It's about simply about not having to have too many negotiating tables open in the same area at the same time and efficiencies about tackling

issues where there are shared interests and encouraging the iwi to consolidate their position around those I think that was the genesis of that large natural grouping policy.

I think we've moved to a much more, to a regionally focused structure with OTS, we've managed to tackle some of those in different ways. We now have the emergence of collectives, and with the emergence of collectives it is probably true to say that we've been able to loosen the reins a bit on the large natural group policy. So we are achieving the same end through a different mechanism. We are always going to have certain situations where we have to tackle the particular issues of what might look on the surface to be, or what are smaller iwis. That's a political process. There's no hard and fast rules that we apply if the politics of the situation require an innovative solution, we are not afraid of that.

48. Patuharakeke contends that the Crown has not demonstrated a willingness to be innovative in the case of Patuharakeke.
49. The Hon Chris Finlayson, Minister of Treaty Settlements stated in his opening address at the 2010 Te Kokiri Ngatahi Hui on the subject of regional engagement,

Regional discussions with groups in preparation for this hui identified some areas of concern that I would like to comment on briefly.

Challenges related to obtaining and maintaining a secure mandate, resolving overlapping claims and agreeing the devolution of redress to sub-groups were raised as key impediments to settlement momentum.

The Crown continues to believe that the best solutions to these issues are achieved by discussions between the principals rather than seeking to have solutions imposed from the outside.

This has been a hard won and occasionally bitter lesson for the Crown.

Although the Crown or some other external body can impose a solution in the name of progress that progress is often an illusion and the settlement momentum generated by these methods is difficult to sustain.

50. Again, in the case of Patuharakeke, the Crown is imposing solutions from the outside, it has not consulted.

51. The Hon Chris Finlayson , Minister of Treaty Settlements stated in February 2014 at the signing of the Ngati Kuri Deed of Settlement,

National's policy since the 1990s has been to address real grievances by reaching full and final settlements with genuine claimants in a timely fashion.

52. He further stated,

... we are determined however to put right the thoroughly and accurately documented cases of hurt caused by the Crown's wrongful actions of the past.

53. On his website he states,

Treaty settlements are as much about recognition and healing as they are about recompense.

54. Patuharakeke are not being recognised in this process. They are genuine claimants.

55. Patuharakeke have real grievances that have been thoroughly researched.

56. Patuharakeke made the conscious decision not to put forward a representative for the Tuhoronuku Independent Mandate Authority ('TIMA'). TIMA cannot meet the needs of Patuharakeke for settlement of its historical Treaty claims. The elected hapu representatives for TIMA for Whangarei ki Mangakahia do not represent Patuharakeke.
57. As a result of the Crown's breaches of Te Tiriti o Waitangi, Patuharakeke are suffering and are likely to continue to suffer significant and irreversible prejudice.
58. Patuharakeke contends that a right to autonomy is inherent in Article 2 of the Treaty. Political authority and autonomy (tino rangatiratanga) are guaranteed. This gives Patuharakeke the prerogative of controlling its own affairs- including both physical and cultural resources. The Crown can not determine the extent of that right by arbitrarily refusing to recognise Patuharakeke as a large natural grouping in its own right.
59. Patuharakeke has always engaged at a political level where possible.
60. Wiki Te Pirihi, grandson of Whakaariki was elected to Parimata Maori - the Maori Parliament in 1896.
61. Maki Pirihi, son of Wiki Te Pirihi and sixty others submitted a petition in 1925 to Parliament requesting that the Ruakaka tenths may be paid over to those legally entitled.
62. Patuharakeke has had a robust governance structure for over 25 years, it has demonstrated a willingness to engage politically at a local and at a national level- an environmental management plan with the Whangarei District Council, Memorandum of Understanding with local industry, submissions to Parliament on the Foreshore and Seabed.
63. Patuharakeke has engaged from the beginning in the Treaty Settlement process. When the government of the day proposed a statutory process to establish Maori tribal authorities through the Runanga Iwi Act 1990, Patuhareke applied for and was granted iwi status (PTB), even though

the Act was repealed a year later. This governance entity pre dated the formalisation of the Treaty settlement process which started in 1992.

64. Patuharakeke filed its first claim in 1998 with the intention of proceeding through the hearing process with an expectation that the Tribunal would make recommendations on how claims should be settled and what large natural groupings should be considered. In spite of proceeding to Stage 2 hearings in 2013 that have not yet been reported, the Crown has proceeded with Direct Negotiation with iwi groups it has selected that have included Patuharakeke claims.
65. There has been little consistency with respect to the OTS recognising large natural groupings – hapu and iwi adjacent to Patuharakeke have been able to achieve direct settlement in recent years- Te Uri o Hau, Ngati Manuhiri, Ngati Rehua.
66. Essentially OTS has decided where hapu and iwi belong, and how big or small the group should be- the Crown changes the rules to suit itself.
67. Patuharakeke has its own tribal structure, it did this independently of the Claim process and well before any claim was submitted. It did this transparently and has done this for almost a quarter of a century. The Crown cannot settle Patuharakeke’s historical claims with other groups that it finds it more expedient to deal with.
68. The Crown has been aware from the beginning of the issues around the definition of large natural groupings- Cabinet papers noted that wider groups such as iwi may not represent the interests of hapu ³– negotiation with iwi was deemed “particularly controversial” and further consultation was recommended.

³ Officials Strategy Committee Treaty of Waitangi Settlement Fund :Size,Shape,Timescale and the Reciprocation from Maori (28 June 1993 CSC(93) 90 para 64 as quoted in Healing the Past or Harming the Future ? Large Natural Groupings and the Waitangi Settlement Process . Malcolm Birdling, NZJPIIL Vol 2 Number 2 Nov 2004 Page 263

69. Cabinet in July 1994 received a report emphasising the importance of getting representation issues right , *"excluding the right people or including the wrong people can both result in new grievance"*⁴
70. Furthermore the report stated that *"aggregating grievances into a wider group eg hapu grievances being subsumed at the iwi level emphasises the overall nature of grievance felt by Maori but could lead to settlements that are not seen to extinguish highly specific grievances."*
71. It is from Patuharakeke that Poupouwhenua was confiscated, it was from Patuharakeke that the Takahiwai and Pukekauri lands were taken under the Public Works Act for water supply to Marsden Point, it is from Patuharakeke that the Waiwarawara reserve and Kopuawaiwaha reserves were not protected and alienated, it is Patuharakeke who has 5 acres remaining from 100,000 acres. It is Patuharakeke who fights to prevent Mighty River Power, a mixed ownership Crown entity, from selling the last piece of Te Poupouwhenua that is not in private ownership. It is Patuharakeke who fights to prevent the development of the land at the Ruakaka Racecourse because of the environmental effects- this is also is memorialised land that should have been returned
72. Patuharakeke asks the Tribunal to consider carefully the fairness of the Crowns approach.
73. In 1993 Chief Judge Durie stated "the just resolution of Maori claims that are fair and reasonable, not only between the partners but amongst Maori themselves, presents the greatest challenge to the claims process. Despite some opinion that the settlement of claims is a political matter, the courts may need to have a continuing role in the search for a proper solution...for the protection of the Crown as much as anyone else."⁵
74. The Tribunal has previously stated that "tribal restoration" is a key component of the settlement process. The Crown has an obligation to protect Patuharakeke role in its rohe and enable it to continue providing

⁴ Ad Hoc Officials Committee "Treaty of Waitangi Settlement Policies : Outstanding Matters (10 October 1994 CSC (94) 140

⁵ Durie "Politics and Treaty Law " 72

the governance and traditional social organisation it has to date and to continue in its path towards spiritual and economic development. The Crown intends to vest assets that were confiscated from Patuharakeke in the iwi settlement entities it is negotiating with – a further block to Patuharakeke restoration.

75. The actions of the Crown with respect to Patuharakeke are repeating the actions of the past. Many Patuharakeke kuia and kaumatua recall the impact of the Maori Affairs Amendment Act 1967.⁶
76. The first part of the Act introduced the 4 owner rule – a compulsory declaration of status which allowed the Court to declare that any Maori land owned by 4 or fewer owners, to be European land , effectively removing the land without the owners consent from the jurisdiction of the Maori Land Court and any of the protections against alienation.

Conclusion

77. The Tribunal has already acknowledged that Treaty guarantees are fundamental. Patuharakeke is a large natural grouping, it has demonstrated tino rangtiratanga and kaitiakitanga for 250 years continuously. Patuharakeke functions in all recognised ways as an iwi-governance in its dealings with neighbouring iwi and in its political and social engagement.
78. Patuharakeke acknowledges its affiliations to Ngati Whatua, Nga Puhi and Ngati Wai and that its rohe sits on the border of all of these. It operates in a sphere of its own, it acts responsibly, it follows tikanga.
79. The Crown insistence that the historical Treaty Claims of Patuharakeke will be settled with three iwi groups that do not have the mandate of Patuharakeke is a breach of the rights of Patuharakeke under Article 2.

⁶ Maori land Policy and Procedure 1967-68 MA 1 Accn W 2490 6815 pt 1 NA

80. The Treaty breaches including the confiscation of Te Poupuwhenua were significant and have been meticulously researched by Patuharakeke.

81. Patuharakeke will continue to exercise mana whenua in its rohe.

Dated the 7th day of November 2014 in Auckland.



Dr Guy Gudex