

Matariki 2024

ANNUAL REPORT

Matariki 2025



Te Kooti Pira Māori
Māori Appellate Court

Mihi

Nau mai e te ao
Haere mai i te pō
Kuhu mai e te wairua
Tū mai e te aroha
Tū atu e te pono
Hei ārahi kia tika, kia wātea, kia ora
Koia rā e Rongo whakairia ake ki runga
Turuturu o whiti whakamaui kia tina!
Haumi ē, hui ē, tāiki ē!

He aha te tohu o te ringaringa? He kawakawa!
Waipuketia ngā awa e ngā roimata me te hupe ki ngā mate kua riro atu ki tua o te ārai.
Auē te mamae me te ngaukino nei.
Haere, whetūrangitia ki te Waka o Rangi ki a Taramainuku.
Noho mai koutou hei whetū ārahi mō tātou ngā waihotanga.
E kore te aroha o rātou mā e waikuratia.

E ngā kāhui whetū, e Matariki, e Puanga, tū mai rā hei tohu mō te tau hou!

Kei ngā maunga whakahī, kei ngā wai tuku kiri o tēnā awa o tēnā awa - ki a tātou, ngā waihotanga o rātou mā - tēnā hoki tātou. E te Rangahaurunga, e te Rangahauraro, tēnei rā e mihi ana.
Tēnā koutou e ngā ringa raupā e whiria te taura here o te tangata. Tēnā koutou e whāngai nei i ngā wawata o te mōrehu tangata, o te mōrehu whenua.

Toitū te kupu, toitū te mana, toitū te whenua!

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Foreword

*Kia tū hei Kooti Māori e tawharau nei
I te pae tangata
I te pae whenua
I te pae whare kōrero*

Kei ngā ihi, kei ngā wehi, kei ngā whakatinanatanga o ngā hōkaka o ngā mātua tīpuna, tēnā koutou katoa. E mihi ana Te Kaiwhakawā Matua me te Pae Matua o Te Kooti Whenua Māori ki a koutou katoa. Tēnei māua ka mihi i roto i ngā tini āhuatanga o te wā, i roto hoki i te wā.. Ka tangihia ngā mate o te tau – ka tangi, ka tangi. Whakangaro atu rā koutou ki a Pōhutukawa, ki Paerau, ki roto i ngā ringaringa o te runga rawa.

Ki a tātou ngā remu tapu e noho tonu nei, tēnā koutou, tēnā koutou, tēnā rā koutou katoa. Nau mai, tomo mai.

A year of consolidation

Welcome to our space, as we reflect on the past year for the Māori Land Court. It has been a time of response and consolidation, building upon the foundation we established last year. Over the past twelve months, our focus has been on delivering timely judicial decisions and implementing the recommendations of the Post Implementation Review of the changes to the Māori Land Court introduced by the Whenua Māori Programme. This has required strengthening our systems and services to ensure greater consistency and efficiency. In this second year of our Mahi Tahi policy, the collaborative efforts of the judiciary and the administration have been instrumental in our achievements.

Advancing digital and operational performance

Our digital solution Pātaka Whenua has undergone significant enhancements based on internal and external user feedback. Through monthly system improvement 'sprints', we rolled out continuous enhancements to improve usability.

Additionally, we have made improvements to Special Aid provider processes, recognising their crucial role in the Court. Reviewing the Special Aid system allowed us to ensure timely payments to Court appointed professionals who provide essential services to Māori landowners.



Chief Judge Dr Caren Fox and Pae Matua Steve Gunson

Delivering for Māori landowners

Two standout achievements must be highlighted. The first, described in more detail later in this report, is the publication of Te Puna Manawa Whenua, the Māori Land Court Bench book, made possible by a judicial team led by Deputy Chief Judge Coxhead and Judge Stone with the assistance of our legal clerks. The second is that by Matariki 2025 no applications awaiting registration were older than 11 weeks – a 79% reduction from the peak of delay experienced earlier in the year. Alongside that, 90% of urgent applications were registered within seven working days of receipt. This success has been made possible through:

- ▲ the efforts of a dedicated team
- ▲ deployment of additional resources
- ▲ system enhancements streamlining processes.

We also made improvements later in the court process, deploying additional resources to complete and distribute court orders reducing the number of outstanding orders by more than half.

Acknowledging our community, kaiwhakawā and kaimahi

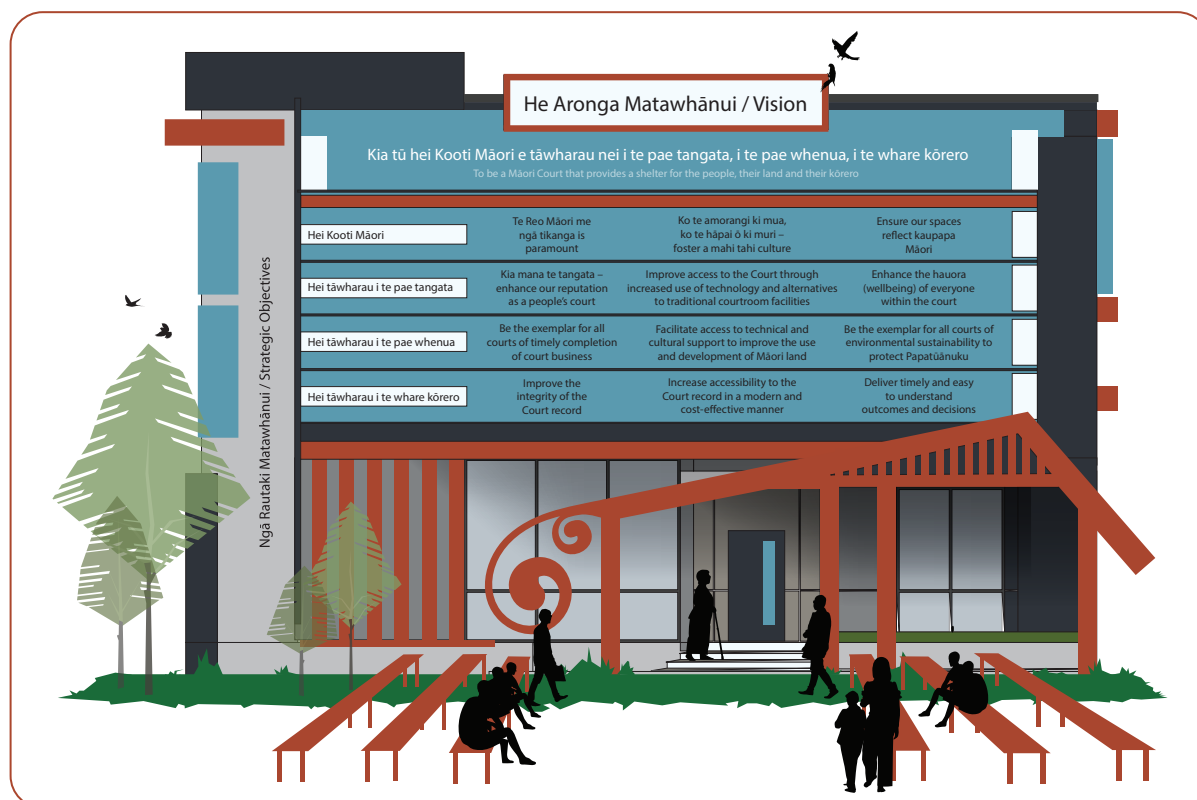
We acknowledge the patience of the community and the dedication of our kaiwhakawā and kaimahi along with whānau who supported them through this period of change and significant workload. The commitment of staff and their resilience have driven steady progress, aided by additional resources from the Ministry of Justice. We acknowledge your dedication and professionalism.

Ngā Mihi Nui

As we close another year, we reflect on the privilege of leading this talented group of judges and staff. Their dedication to making the Māori Land Court a truly Māori space – where people are engaged respectfully and in culturally appropriate ways – is truly inspiring.

To acknowledge their contributions and share our work over the past year, we are excited to document our progress in the pages that follow.

Māori Land Court business profile



Connecting to whānau and whenua

The Māori Land Court is New Zealand's oldest and longest-established specialist court, distinguished as the world's only indigenous land court. Whenua is integral to the identity of tangata whenua. It is tūrangawaewae – the place where we come from, the place we belong to, the place we stand.

As a court of record, the Māori Land Court is responsible for ensuring the accurate documentation of Māori land succession and management. Its work is guided by the Te Ture Whenua Māori Act 1993, which recognises Māori land as taonga tuku iho – a precious heritage and treasure passed down through generations.

Our Courts

The Māori Land Court operates over seven districts across Aotearoa, with district offices located from Whangārei in the north to Ōtautahi in the south. In addition to these district offices, we have an information office in Auckland and the Chief

Registrar's Office in Wellington. Each district holds monthly court sittings at its district office, as well as at other locations across the rohe at varying frequencies.

Our Purpose

Our purpose is to promote and facilitate the retention of Māori land in Māori hands, and to support landowners to use, occupy, and develop their whenua for the benefit of all landowners, their whānau and hapū.

The legislation that empowers us to perform this role is Te Ture Whenua Māori Act 1993, which recognises the importance of Māori land as taonga-tuku-iho – of special significance to Māori passed down through generations.

Our Vision

The Māori Land Court is jointly operated by administrative staff from the Ministry of Justice and judicial officers, working towards a shared vision:

Kia tū hei Kooti Māori e tāwharau nei i te pae tangata, i te pae whenua, i te whare kōrero

(To be a Māori Court that provides a shelter for the people, their land, and their kōrero)

Our Services

The Māori Land Court provides specialist services to Māori landowners and, in pursuit of its vision, operates across nine key areas:

- **Land Status and Ownership** – determining the legal status, ownership, and associated interests in Māori land
- **Land Transactions** – approving transfers of ownership and other transactions concerning Māori land
- **Succession Management** – processing succession applications to ensure the correct transfer of land interests
- **Trusts and Incorporations** – facilitating the establishment of collective management structures for Māori land
- **Dispute Resolution** – providing a forum for resolving conflicts related to Māori land ownership and use
- **Protection of Wāhi Tapu** – safeguarding sites of cultural and historical significance located on Māori land
- **Landowner Support** – guiding landowners in occupying, using, and developing their land for the benefit of whānau and hapū
- **Court Record Management** – maintaining a comprehensive and accurate record of Māori land ownership and transactions
- **Stakeholder Collaboration** – working with agencies such as LINZ and Te Tumu



Judges of the Court/ Ngā Kaiwhakawā o te Kooti



Chief Judge Caren Fox

Ngāti Porou

- ◆ Appointed 1 December 2000 (104th Māori Land Court Judge)
- ◆ Appointed Deputy Chief Judge 20 February 2010
- ◆ Appointed Chief Judge 5 July 2023
- ◆ Resident Judge, Tairāwhiti
- ◆ Waitangi Tribunal Chairperson (appointed 22 August 2023) and Presiding Officer: Porirua ki Manawatū Inquiry (Wai 2200), Constitutional Kaupapa Inquiry (Wai 3300)
- ◆ Also holds a warrant as an Alternate Environment Court Judge



Judge Wilson Isaac

Ngāti Porou, Ngai Tūhoe, Ngāti Kahungunu

- ◆ Appointed 11 March 1994 (100th Māori Land Court Judge)
- ◆ Appointed Deputy Chief Judge 8 September 1999
- ◆ Appointed Chief Judge 13 August 2009 (until 30 April 2023)
- ◆ Resident Judge, Tairāwhiti
- ◆ Waitangi Tribunal Presiding Officer: Military Veterans Inquiry (Wai 2500), National Freshwater and Geothermal Resources Inquiry (Wai 2358), Historical Claims Standing Panel (Wai 2800)
- ◆ Also holds a warrant as a Judge of the High Court of Niue and of the Cook Island High Court (Land Division)



Deputy Chief Judge Craig Coxhead

Ngāti Makino, Ngāti Pikiao, Ngāti Awa, Ngāti Maru

- ◆ Appointed Deputy Chief Judge 22 May 2024
- ◆ Appointed 25 January 2008 (109th Māori Land Court Judge)
- ◆ Resident Judge, Waiariki
- ◆ Waitangi Tribunal Presiding Officer: Te Paparahi o te Raki Inquiry (Wai 1040), Housing Policy and Services Inquiry (Wai 2750)
- ◆ Also holds a warrant as Chief Justice of the High Court of Niue, and as a Judge of the Cook Islands High Court (Land Division)



Judge Carrie Wainwright

- ◆ Appointed 17 November 2000 (103rd Māori Land Court Judge)
- ◆ Resident Judge, Tairāwhiti
- ◆ Waitangi Tribunal Presiding Officer: Te Rau o te Tika: The Justice System Inquiry (Wai 3060), Remedies phase of the Renewed Muriwhenua Land Inquiry (Wai 45), Wairarapa ki Tararua Inquiry (Wai 863)



Judge Stephanie Milroy

Ngāi Tūhoe, Ngāti Whakaue

- ◆ Appointed 18 October 2002 (106th Māori Land Court Judge)
- ◆ Resident Judge, Te Waipounamu
- ◆ Waitangi Tribunal Presiding Officer: Mangatū Remedies Inquiry (Wai 814)
- ◆ Also holds a warrant as an Alternate Environment Court Judge



Judge Sarah Reeves

Te Ātiawa

- ◆ Appointed 10 December 2010 (110th Māori Land Court Judge)
- ◆ Appointed Deputy Chairperson, Waitangi Tribunal 24 November 2021
- ◆ Acting Chairperson, Waitangi Tribunal from 1 May to 22 August 2023
- ◆ Resident Judge, Te Waipounamu
- ◆ Waitangi Tribunal Presiding Officer: Mana Wāhine Inquiry (Wai 2700)
- ◆ Also holds a warrant as a Judge of the High Court of Niue



Judge Damian Stone

Ngāti Kahungunu

- ◆ Appointed 25 March 2019 (114th Māori Land Court Judge)
- ◆ Resident Judge, Tākitimu
- ◆ Waitangi Tribunal Presiding Officer: Health Services and Outcomes Inquiry (Wai 2575)



Judge Rachel Mullins

Ngāti Kahungunu, Kai Tahu

- ◆ Appointed 27 October 2021 (115th Māori Land Court Judge)
- ◆ Resident Judge, Waikato Maniapoto
- ◆ Waitangi Tribunal Presiding Officer: Te Kura Kaupapa Māori Urgent Inquiry (Wai 1718)



Judge Michael Doogan

- ◆ Appointed 25 January 2013 (111th Māori Land Court Judge)
- ◆ Resident Judge, Aotea
- ◆ Waitangi Tribunal Presiding Officer: North-Eastern Bay of Plenty Inquiry (Wai 1750)
- ◆ Also holds a warrant as an Alternate Environment Court Judge



Judge Aidan Warren

Rangitāne, Ngāti Kahungunu, Ngāi Tahu, Pākehā, Cherokee Nation

- ◆ Appointed 27 October 2021 (116th Māori Land Court Judge)
- ◆ Resident Judge, Aotea
- ◆ Also holds a warrant as an Alternate Environment Court Judge



Judge Miharo Armstrong

Te Whānau a Apanui

- ◆ Appointed 1 August 2014 (112th Māori Land Court Judge)
- ◆ Resident Judge, Te Taitokerau
- ◆ Waitangi Tribunal Presiding Officer: Marine and Coastal Area (Takutai Moana) Act Inquiry (Wai 2660)
- ◆ Also holds a warrant as a Judge of the High Court of Niue and of the Cook Island High Court (Land Division)



Judge Te Kani Williams

Tūhoe, Whakatōhea, Ngāi Tai ki Torere, Ngāti Manawa, Ngāti Maniapoto, Tainui, Te Aupouri

- ◆ Appointed 9 December 2021 (117th Māori Land Court Judge)
- ◆ Resident Judge, Te Taitokerau
- ◆ Also holds a warrant as an Alternate Environment Court Judge



Judge Terena Wara

Waikato, Ngāti Raukawa ki te Tonga

- ◆ Appointed 1 March 2019 (113th Māori Land Court Judge)
- ◆ Resident Judge, Waiariki
- ◆ Also holds a warrant as an Alternate Environment Court Judge



Judge Alana Thomas

Ngāpuhi, Ngāti Rēhia, Ngāti Kuri

- ◆ Appointed 20 May 2023 (118th Māori Land Court Judge)
- ◆ Resident Judge, Aotea



Judge Nathan Milner

Ngāti Porou, Kai Tahu

- ◆ Appointed 22 May 2024 (119th Māori Land Court Judge)
- ◆ Resident Judge Tairāwhiti
- ◆ Waitangi Tribunal Presiding Officer: The Regulatory Standards Bill Urgent Inquiry (Wai 3340)

Chief Judge update



Image by Laurissa Beckham

Matariki sunset

Mahi tahi

This year has been the second year of our mahi tahi policy that guides how the judiciary works with the administration of the Court. We are pleased that we are finally seeing improved application disposal rates. As we head into the 2025/26 year, we are determined that the disposal rate will continue to improve.

The judges are committed to ensuring they support the staff focus on progressing our backlog through to completion as quickly as possible, including requiring more sitting days once

pre-court staff have completed their role in moving applications through to the Court. Judges will also be focused on improving their judgment delivery dates as the backlog improves, as post-Court staff move to more efficiently manage minutes and progress our judgments.

By this time next year, we expect the Court will have dealt with our backlog and moved into a sustainable programme of work. This is our primary focus for the year ahead of us. We will also progress our other strategic goals including focusing on judicial and staff wellbeing.

Pae Matua operations update



Once again, Matariki offers us an opportunity to reflect on the past and embrace the future. As we close another year, I want to take a moment to express my deep gratitude to all kaimahi whose unwavering dedication, resilience, and hard work have been the driving force behind our successes over the past twelve months. Through both challenges and triumphs, the team have demonstrated commitment, teamwork, and passion in an effort to improve outcomes for those accessing the Court's services.

This year has been a particularly busy one for the Māori Land Court. Over the past twelve months, the Court has continued to play a pivotal role in the administration and protection of Māori land interests across Aotearoa New Zealand, focusing on three key priorities:

1. Enhancing digital services
2. Improving application and enquiry resolution
3. Deepening community engagement

Enhancing digital services

June 2025 marked the two-year anniversary of our redesigned website and the launch of our online portal - Pātaka Whenua. These years have not been without challenges – introducing Pātaka Whenua was a transformative yet difficult transition, particularly for landowners, whānau, applicants, and other users of the Court's services. In response to these difficulties, we implemented 55 enhancements to improve usability. These enhancements were guided by invaluable user feedback.

Improving application and enquiry resolution

Improving the processing and completion of applications and enquiries has been another area of focus. Our team committed many hours of overtime to entering new applications into Pātaka Whenua and progressing applications towards resolution. Additionally, by establishing a dedicated Information Services team, we significantly reduced response times and cleared the backlog of enquiries, whether you contacted us in person, email, or by phone.

Deepening community engagement

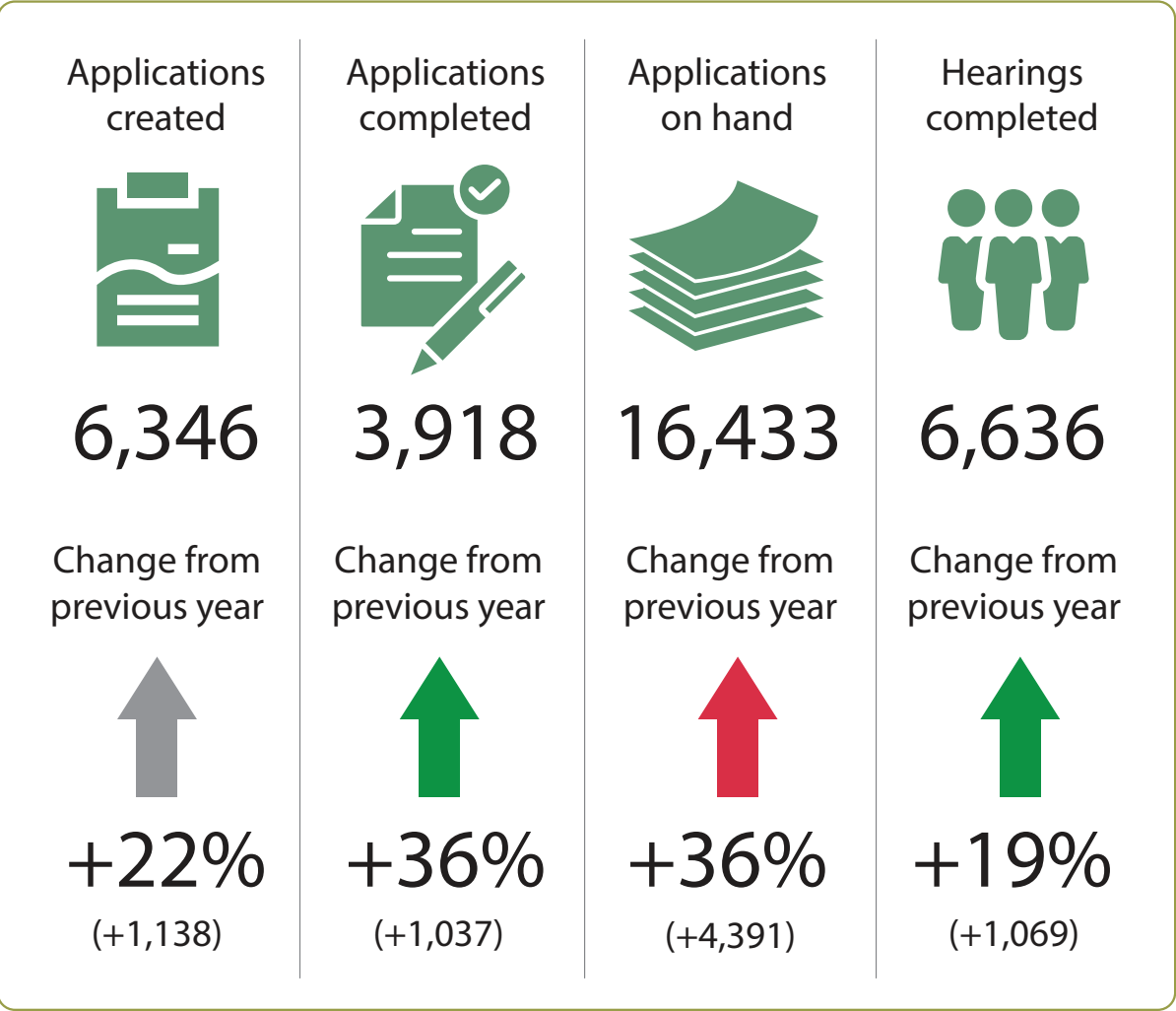
Another of our focusses this year has been on community engagement, as reflected in the district updates in this report. Our engagement activities have strengthened kaimahi connections with both the community we serve and the whenua. These efforts have allowed us to connect directly to communities, providing information and guidance to Māori landowners and court users.

Looking ahead, we will be continuing our journey, further improving the customer experience (Kua whai ora te tangata), increasing the accessibility of our services (Kua huakina te tatau), and making technology more user friendly (Kua puta mai ao hau).

National performance

Over the year, the total number of applications on hand grew. This growth was driven by an increase in the number of new applications created, underpinned by staff tackling a backlog of new applications awaiting processing that had built up from the year prior, and by the number of applications completed continuing to be impacted by the changes within the court.

Despite this context, we have seen some improvements, notably an increase in the number of court hearings completed during the year, and an increase in the number of applications completed between Matariki 2024 and Matariki 2025 compared to the year prior.



Annual business planning

The Māori Land Court's leadership produces an annual business plan to drive the delivery of key objectives over the course of the year. The 2024/25 plan was called Ngā ringa maihi o te whare and was guided by our vision Hei Aronga Matawhānui - to be a Māori Court that provides a shelter for the people, their land, and their kōrero.



Waitangi Tribunal, Māori Land Court staff and Chief Judge Fox meeting with our Ministers Potaka and Goldsmith at Te Matatini Taranaki

Our business objectives for 2024/25

The Māori Land Court business plan was based on our four strategic objectives (ngā rautaki matawhānui):



Hei Kooti Māori

- make Te Reo Māori me ngā tikanga paramount to how we work
- foster a mahi tahi culture (ko te amorangi ki mua, ko te hāpai ō ki muri)
- ensure our spaces reflect kaupapa Māori



Hei tāwharau i te pae tangata

- enhance our reputation as a people's court (kia mana te tangata)
- improve access to the Court through increased use of technology and alternatives to traditional courtroom facilities
- enhance the hauora (wellbeing) of everyone within the court



Hei tāwharau i te pae whenua

- acknowledge the rangatiratanga of the owners, their whānau and their hapū
- be the exemplar for all courts of timely completion of court business
- facilitate access to technical and cultural support to improve the use and development of Māori land and other taonga
- be the exemplar for all courts of environmental sustainability to protect whenua and other collective taonga



Hei tāwharau i te whare kōrero

- improve the integrity of the Court record
- increase accessibility to the Court record in a modern and cost-effective manner
- deliver timely and easy to understand outcomes and decisions

Achievements in the year

Over the period, we delivered strongly on our Business Plan. Highlights under each of our four strategic objectives included:



Hei Kooti Māori

- developed and implemented a Mahi tahi policy, a set of principles agreed on by the judiciary and the Ministry of Justice to work jointly, as partners
- developed a court-wide Te reo me ngā tikanga Māori strategy, to be implemented between Matariki 2025 and Matariki 2026



Hei tāwharau i te pae tangata

- developed and implemented Hauora Plans for each office to support the wellbeing of judges, kaimahi, and people using the court
- delivered biennial open days for all district offices
- expanded the number of offsite venues for court sittings to bring the Court directly to communities all around the motu



Hei tāwharau i te pae whenua

- implemented Post Implementation Review recommendations to improve systems, processes, and procedures (see PIR section for details) to improve service delivery
- developed and produced performance reports to improve application disposal rates
- developed our Te Taiao sustainability and climate change policy



Hei tāwharau i te whare kōrero

- developed and rolled out an enhanced induction programme for new kaimahi
- continued to provide judicial education programmes and monitored law reform proposals put forward by the Government

Māori land data updates - Ngā Āhuatanga o te whenua



The annual update provides key statistics on Māori land, including:

- the number and total area of Māori Customary Land and Māori Freehold Land blocks
- how many of these blocks are managed by trusts or incorporations.

Māori Customary Land Titles

Rohe	Number	Area (ha)
Taitokerau	5	38,5573
Waikato-Maniapoto	14	48,2919
Waiariki	2	453,2479
Tairāwhiti	2	4,8688
Takitimu	1	0.2124
Aotea	15	659,1240
Te Waipounamu	0	0.0
Total	39	1,204.3023

Māori Freehold Land Titles

Rohe	Number	Area (ha)
Taitokerau	5,495	139,016.4237
Waikato-Maniapoto	3,788	123,891.2221
Waiariki	5,208	305,634.0386
Tairāwhiti	5,386	277,210.8503
Tākitimu	1,440	88,093.4121
Aotea	4,061	412,194.9589
Te Waipounamu	2,325	66,129.6711
Total	27,703	1,412,170.5768

Management structures*

Rohe	# of Structures	Blocks with structures	Area with structures (ha)	Blocks without structures	Area without structures (ha)
Taitokerau	1,152	1,499	84,383.3834 (61%)	4,084	54,820.5056 (39%)
Waikato-Maniapoto	1,273	1,698	96,332.9114 (77%)	2,165	29,377.1078 (23%)
Waiariki	2,156	2,456	290,865.6680 (94%)	2,801	17,771.0417 (6%)
Tairāwhiti	1,393	1,845	239,550.8687 (85%)	3,610	41,332.8604 (15%)
Tākitimu	542	653	73,612.3493 (84%)	813	14,538.8091 (16%)
Aotea	1,227	2,198	442,511.0960 (93%)	2,020	32,170.9559 (7%)
Te Waipounamu	561	1,362	44,014.5627 (67%)	977	22,139.8634 (33%)
Total	8,304	11,711	1,271,270.8395 (86%)	16,470	212,151.1439 (14%)

* This includes management structure types of Ahu Whenua Trusts, Whenua Tōpū Trusts, Māori Incorporations, Māori Reservations, and trusts that are a sole owner of a block. See excluded land types on following page.

Other statistics

- ▲ Blocks with a land management structure have an average size of 108.55 ha and average 211 beneficial owners.
- ▲ Blocks without a land management structure have an average size of 12.88 ha and average 41 owners.
- ▲ Overall, an average Māori land block has a size of 52.64 ha and 111 owners.
- ▲ The total number of allocated ownership records recorded in all blocks is 3,136.458.

Land management structure details

Rohe	Total	Māori Incorporations	Ahu Whenua Trusts	Māori Reservations	Whenua Tōpū Trusts	Other Trusts that are sole owner
Taitokerau	1,152	14	509	626	1	2
Waikato-Maniapoto	1,273	13	956	294	6	4
Waiariki	2,156	27	1,578	538	7	6
Tairāwhiti	1,393	59	1,055	273	5	1
Tākitimu	542	6	416	111	4	5
Aotea	1,227	21	839	351	10	6
Te Waipounamu	561	8	427	124	2	0
Total	8,304	148	5,780	2,317	35	24

Land Interest Trusts

- ▲ The total number of Whānau Trusts nationally is 12,247
- ▲ The total number of Kaitiaki Trusts nationally is 2,459

Exclusion list

The following land types have been excluded from this update:

- ▲ Crown Land, Crown Land Reserved for Māori, Other, General Land owned by Māori (a total of 450 blocks covering an area of 23,452.1288 ha)
- ▲ Blocks pending internal review and investigation (a total of 220 blocks covering an area of 5,202.3754 ha)

Te Ao Māori strategy



District offices continue their efforts to uphold the tapu, mana, and mauri of the Māori language through regular activities serving to strengthen kaimahi knowledge, capability, and the provision of culturally responsive services for kaupupuri whenua and court users.

Te Roopū Tautoko i Te Reo Māori, a cross-rohe working group to support te reo Māori activity across the court, re-developed Te Rautaki Reo o Te Kooti Whenua Māori 2025 (The Māori Land Court Te Reo Māori Strategy 2025), which affirms the court's commitment to te reo Māori revitalisation and outlines the language-related activities to be undertaken across the administration of the court over a twelve-month period. The strategy aligns with the judiciary's te reo Māori strategy, and the judiciary and administration are committed to working together to achieve the shared goals outlined in both documents in support of the vision of He Aronga Matawhānui – Kia Tū Hei Kooti Māori – hei tawharau i te pae whenua, i te pae tangata, i te whare kōrero.

Te Rautaki Reo o Te Kooti Whenua Māori recognises the depth and enduring nature of the relationship between te reo Māori, tāngata whenua, and the whenua itself, and emphasises the vital importance of the survival and protection of te reo Māori. The rautaki aims to support national language regeneration efforts, and to expand the work already underway to revitalise and normalise te reo Māori me ōna tikanga across the court. These activities include:

- › the continued development of a puna kupu (language resource) and bilingual templates to be utilised throughout court business
- › the increased use of te reo Māori within court proceedings and external communications
- › increased access to language learning opportunities and resources for kaimahi, and
- › District office te reo Māori action plans to reflect the unique language aspirations specific to each rohe.

Outside of the activities outlined in the strategy, kaimahi and offices have continued to ensure te reo Māori is seen, heard, and spoken through countless kaupapa and initiatives, including:

- › kapa haka
- › mihi whakatau/pōwhiri and poroporoaki
- › shared kai and whakawhanaungatanga
- › the learning and sharing of whaikōrero and pepeha
- › guest speaker sessions
- › papakāinga workshops, and court open days.

District offices continue to routinely hold celebrations to mark Matariki and Te Wiki o Te Reo Māori, and participate in and support locally based kaupapa. There has been a strong uptake of both the Te Ātaarangi and Mumu Reo pilot te reo Māori development offerings.

Responding to the Post Implementation Review

Over the last year, a focus for the Māori Land Court has been implementing the recommendations of the Whenua Māori Programme Post Implementation Review (PIR). The PIR was the evaluation phase following the launch of our new digital platform, Pātaka Whenua, which went live in June 2023.

The Māori Land Court and Te Anga Whakamua project team, established to implement the PIR recommendations, have been working to improve the experience of court users and the operation of the Māori Land Court. As of 30 June 2025, 32 of the 41 PIR recommendations approved by the joint judicial and Ministry of Justice steering committee have been completed, with the remaining nine in progress.

Significant progress has been made in reducing the backlog of applications waiting to be registered. Between January and March 2025, the number of backlog applications awaiting registration decreased by 1000. By June 2025, new applications were being registered within three months, considerably faster than at any stage earlier in the year.

Responsiveness to enquiries has also

improved through the establishment of dedicated Information Services teams at each office. These teams are focussed on providing information and advice to court users for all enquiries whether in person, on the phone, by email, or through Pātaka Whenua.

Enhancements to our technology solution Pātaka Whenua have been a key focus. Over 37 weeks, from September 2024 to May 2025, 55 system enhancements to Pātaka Whenua were implemented. These enhancements have focussed on improving the usability of Pātaka Whenua for both kaimahi and public users, and will continue to deliver benefits into the future.

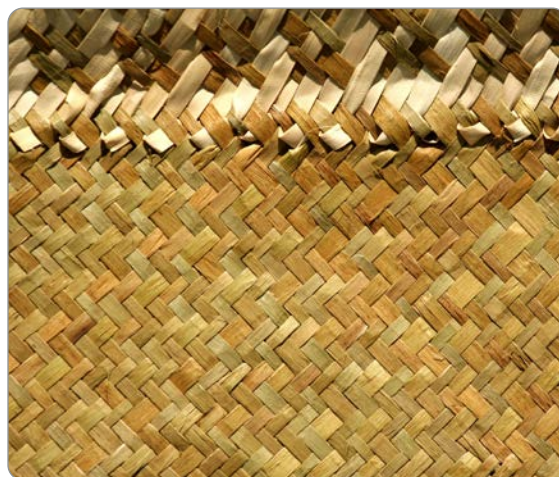
Improvements have been made to our website to better support users of Pātaka Whenua. New 'How-do-I?' guides providing step by step guidance are now available on our website on an updated Pātaka Whenua guidance page, as well as in hard copy in all our offices.

Significant work has been done this year to implement the PIR recommendations, and this focus will continue as we work to deliver the remaining nine recommendations.

Judicial Decisions Online – expanding access to Māori Land Court decisions

In 2024, the publication of Māori Land Court (MLC) and Māori Appellate Court (MAC) decisions commenced on the Judicial Decisions Online (JDO) platform, hosted on the Ministry of Justice website. This initiative enhances accessibility by providing fully indexed and text-searchable decisions. Currently JDO houses decisions dating back to 2023, with ongoing efforts to extend coverage further into the past to align with Decisions Finder that currently has Māori Land Court judgements back to 2000 and Māori Appellate Court judgements back to 1993.

JDO has served as a repository for senior court decisions for over a decade, and recent



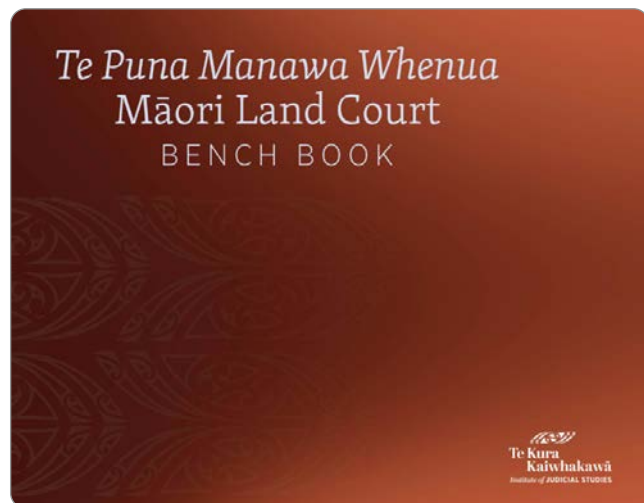
expansions now include decisions from lower courts. As the central, freely accessible portal for judicial decisions, JDO enables users to conduct comprehensive searches across all courts, including te ao Māori terminology. For instance, a search for 'wāhi tapu' will return relevant decisions from the Supreme Court, Court of Appeal, High Court, Employment Court, Environment Court, and the Māori Land Court.

As additional decisions are added, users will also be able to track cases as they progress through appellate review, ensuring continuity and transparency across judicial processes.

All reserved decisions of the MLC and MAC - excluding oral judgments delivered in court - are now routinely published. Decisions from other courts are selectively added to JDO, based on various criteria including case volume and suppression orders.

To locate an MLC decision via citation on JDO, users can easily enter the minute book reference along with the full district name in the search box, such as 335 Waiariki MB 40. Citation standards for judicial decisions are outlined in the New Zealand Law Style Guide.

Te Puna Manawa Whenua – now accessible to the public



All courts maintain a Bench Book, a resource prepared by and for judges that provides guidance on legislation and significant case law relevant to each jurisdiction. Te Puna Manawa Whenua, the Māori Land Court Bench Book, serves as a reference for Māori land law and Māori Land Court decisions. Written specifically for Māori Land Court judges, it ensures they remain informed about court rulings and interpretations of the Te Ture Whenua Māori Land Act 1993.

Regular updates to the Bench Book are undertaken by judges and research counsel, incorporating notable case law developments and legislative amendments. Every effort is made to ensure the accuracy and currency of the information provided. It offers a quick-reference guide, but is not a binding statement of law.


Historically, the Māori Land Court Bench Book, like all Court bench books, was accessible

only to Judges and Chambers staff via Te Pā, the judicial intranet. However, on 14 May 2025, it was made available to the public and court personnel as part of an initiative led by the Chief Justice to enhance access to judicial resources. This marks the second release in the series, following the publication of the Criminal Jury Trials Bench Book.

The decision to publish the Māori Land Court Bench Book aligns with efforts to promote transparency within the justice system, and to provide valuable guidance to all those engaging with court processes. It is expected to serve as a key resource for Māori landowners, legal counsel, and other stakeholders interacting with the Māori Land Court, while also fulfilling an educational function.

The Māori Land Court Bench Book can now be accessed via both the Courts of New Zealand website and the Māori Land Court website.

District operational updates



Taitokerau - Whangārei

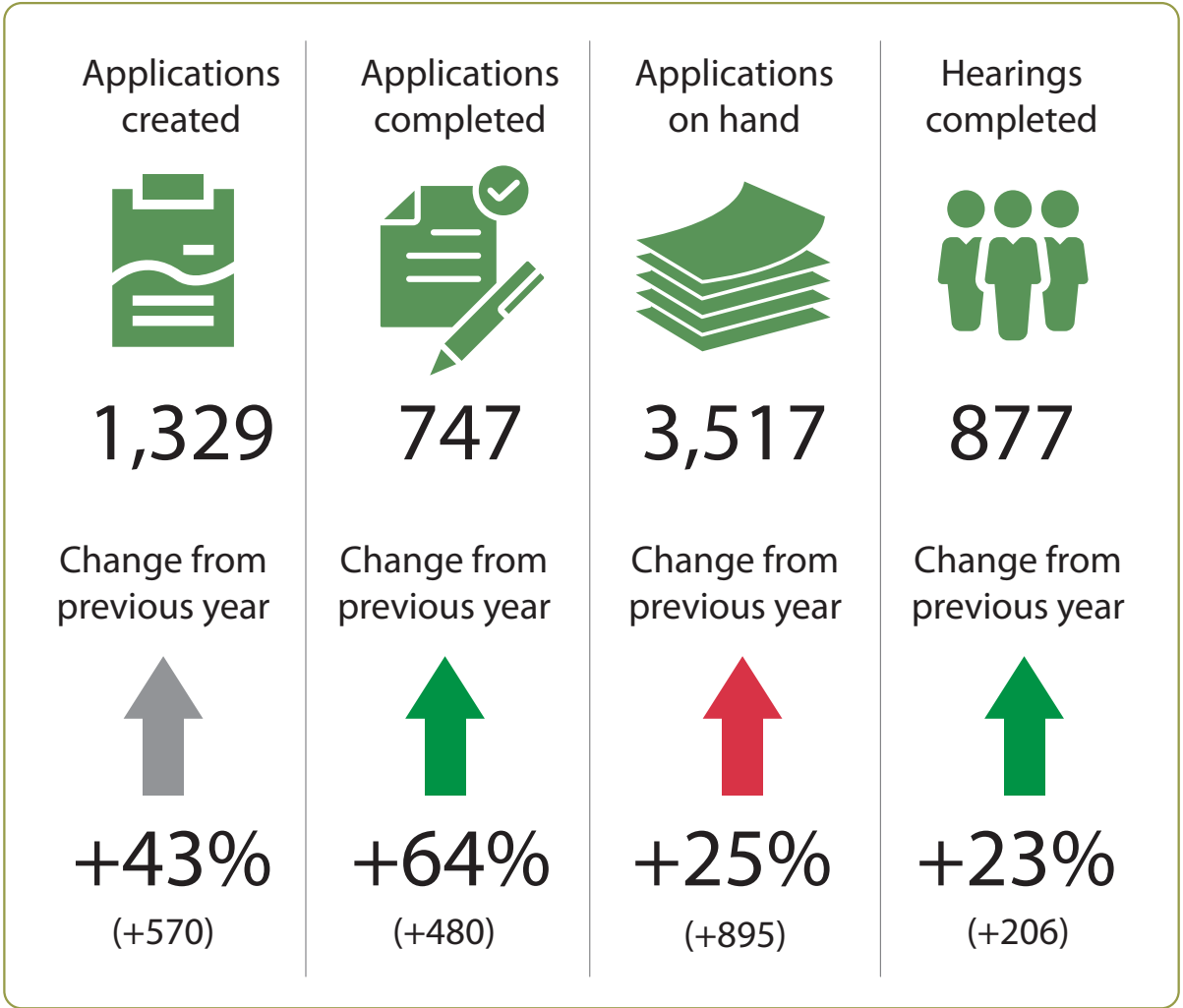
28 kaimahi

2 resident judges

5,583 landblocks

139,203 hectares

207, 498 owners



A year of change and progress

The past year has brought its share of challenges as we navigated changes to Pātaka Whenua and adjusted to significant staff turnover, including the departure of kaimahi with decades of experience. Despite this, we’ve been fortunate to welcome new, highly skilled kaimahi, and have observed their growth and development with pride.

Managing high volumes of applications remains an ongoing challenge as we strengthen our capability. However, progress is evident, particularly in our Information Services space and the completion of a backlog of orders, which has been a significant achievement. Compared to the previous year, we have been able to respond to enquiries quicker and process applications faster.

Strengthening community relationships

The Taitokerau Māori Land Court has further solidified its strong relationship with 155 Community Law Centres, continuing our partnership to provide paneke sessions and live online webinars. These efforts support Māori landowners and entities, ensuring they have access to the guidance and information they need.

Waitangi Day remains a cherished annual highlight, with a noticeable increase in attendance this year – a testament to the continued significance of this event in our community.

Commitment to Te Reo and Tikanga

The district office is actively engaging in Te Reo and Tikanga activities, expanding on our weekly karakia and waiata sessions. Our komiti, Te Arahitanga, continues to offer valuable direction and support, enriching our workplace culture.

Honouring a legacy

This year we marked the retirement of Reona Parkin, whose father once served as a Registrar of the Taitokerau Māori Land Court. Reona dedicated 38 years of service to the Whangārei office, and her bright presence and reliable contributions will be deeply missed.



An unusual photo-op for Judge Armstrong with students from National Dong Hwa University in Taiwan

Strengthening international connections

The Taitokerau Māori Land Court had the honour of hosting a delegation of students from National Dong Hwa University in Taiwan. This visit provided an opportunity to reciprocate the hospitality extended to Judge Armstrong during his attendance at the Legal Aid Foundation conference on the rights of indigenous peoples in Taiwan.

The students were given a guided tour of the Māori Land Court in Whangārei, followed by an

insightful presentation from Judge Armstrong on the history and significance of the Māori Land Court. They also had the opportunity to observe a live court hearing in Kaikohe, gaining a first-hand understanding of the Court's processes.

In addition to formal engagements, Judge Armstrong and Judge Williams hosted the delegation for dinner and took part in sightseeing activities across Taitokerau, further deepening the cultural exchange and fostering meaningful relationships between both communities.



Waikato-Maniapoto - Hamilton

27 kaimahi
1 resident judge
3,863 landblocks

125,710 hectares
349,704 owners

Applications created



1,012

Change from previous year



+39%
(+398)

Applications completed



478

Change from previous year



+23%
(+109)

Applications on hand



2,691

Change from previous year



+28%
(+742)

Hearings completed



854

Change from previous year



+17%
(+147)

A year of engagement and transition

The past year has been significant, marked by key events, community involvement, and changes within our team.

Honouring traditions and community connections

Waikato staff proudly represented the Māori Land Court at the koroneihana and the King's tangi in Ngāruawāhia. Many team members made meaningful contributions through their respective marae, ensuring these important occasions were well supported.

Our Te Roopu Kokiri komiti remained actively engaged, leading regular waiata sessions and social initiatives aligned with the district Hauora (wellbeing) plan. Fundraising efforts are also underway for the upcoming national Papatūānuku tournament, set to take place in Aotea later this year.

Matariki was celebrated alongside Te Tumu Paeroa and through district Māori Land Court activities. Our kaimahi also took part in the Hautapu ceremony at Hamilton Gardens, showing strong support for this cultural tradition.

Farewelling valued kaimahi

This year we bid farewell to two long-serving employees. Johnson Raumati retired after 39 years of service, having made extensive contributions to both the Waikato office and the national Māori Land Court team. Margaret Hudson retired after 23 years in the Hamilton office, having played a pivotal role in strengthening operations.

While their departures are deeply felt, the team wishes them both the very best for their well-earned retirements.

Operational pressures and growth

Managing high volumes of applications continues to be an ongoing challenge. Our Information Services team remains extremely busy, but the transition to a team of dedicated front-end staff managing

enquiries has significantly improved support for Māori landowners and entities accessing the Court.

The loss of staff has added to workplace pressures, often with many years of experience working for the Māori Land Court. But we are focused on building capability and experience across the team to ensure continued service excellence.

Strengthening partnerships

Our commitment to community engagement remains strong. We continue to foster a valuable working relationship with Community Law, maintaining our partnership to provide paneke sessions and live online webinars that share knowledge with, and provide guidance for, Māori landowners and entities.



Some of the Waikato kaimahi attending Koroneihana

Pātaka Whenua webinars

Waikato-Maniapoto Māori Land Court kaimahi, jointly with 155 Community Law, delivered a webinar series introducing Pātaka Whenua with a live presentation of up-to-date search capability and online filing demonstrations. These attracted participants from across the Waikato region, as well as other areas of the motu.

The webinar series was a great success. A strong partnership with 155 Community Law has significantly enhanced the level of information and support available to Māori landowners.

Koroneihana in Waikato

Koroneihana is a significant event in the Waikato calendar, marking the coronation anniversary of the Kiingitanga (Māori King Movement). Held annually at Tūrangawaewae Marae in Ngāruawāhia, it features pōwhiri, kawē mate, mihimihi, kōrerorero, kai, kapa haka, and sports.

The event attracts thousands of attendees, including international royalty and dignitaries. This year celebrated the 18th coronation anniversary of Kiingi Tūheitia Pōtatau Te Wherowhero VII GCCT KStJ.

Waikato-Maniapoto's contribution

Te Roopu Kōkiri ki Waikato Maniapoto had the pleasure to organise:

- He Wānanga hei whakarite mō te Koroneihana (Koroneihana preparation session)
- He Haerenga ki te Koroneihana (Attending Koroneihana)

A wānanga was hosted at the Māori Land Court premises, led by kaimahi Johnson Raumati, providing kōrero on Koroneihana's history. This learning journey culminated in a haerenga during Koroneihana week, running from 15 August to 21 August 2024.



Waiariki - Rotorua

39 kaimahi
2 resident judges
5,257 landblocks

308,636 hectares
1,111,625 owners

Applications created



1,156

Change from previous year



-1%
(-14)

Applications completed



723

Change from previous year



-29%
(-208)

Applications on hand



3,745

Change from previous year



+28%
(+1,060)

Hearings completed



1,502

Change from previous year



+20%
(+298)

A year of growth, connection, and new horizons

The past year has been a whirlwind of opportunity and change for the Waiariki District. In a fast-moving environment, we have shown resilience and agility – hitting key milestones, deepening community ties, and laying strong foundations for the future. Here's a look back at some of the highlights that made 2024–2025 a year to remember.

Taking our work beyond the office walls

In November 2024, we launched our first Waiariki District Open Day, perfectly timed with Rotorua Heritage Week when the city buzzes with visitors

and locals alike. This immersive day featured captivating presentations by Ben Manley, our Archives Historian and former MLC staffer, who brought the Court's records and history to life. Alongside him, our Pae Manawa, Pae Tukutuku Purapura Whetu, and Pae Whakatere shared insights into the Court's operations and the stories behind the counter.

But we did not stop there. Understanding the importance of meeting people where they are, our team joined paneke engagements at wānanga, marae, and community events across the rohe, working closely with our Pae Manawa Jimi McLean to strengthen those vital connections.

Our collaboration with the Rotorua Community Law Centre, led by Tumamako Silveria, also grew, improving legal aid access for Māori landowners.

Strengthening our services, expanding our reach

We celebrated the unwavering commitment of our kaimahi to the projects flowing from the Post Implementation Review. Their efforts drove the completion of Te Waharoa application registrations, resolved Information Services inquiries, and supported essential overtime initiatives. This dedication, alongside the support of their wider team, has been the backbone of our progress.

To better serve our communities, we opened new Court venues at Te Wānanga o Awanuiārangi (Whakatāne), Waitahanui Community Centre (Taupō), Te Aho Wānanga (Ōpōtiki), and The Resort (Te Kaha). Although arranging these venues is often a complex task, these new locations make court services more accessible, meeting the needs of people where they live and work.

Transitions, new beginnings, and leadership legacies

This year saw important leadership changes that mark both endings and fresh beginnings. After a long and distinguished career, our esteemed Pae Ārahi of Te Rito retired (see side panel for a special tribute).

In April 2025, Claire Stirling-Hawkins (Te Whānau-ā-Apanui, Ngāti Porou, Ngāti Kauwhata, Ngāti Raukawa ki Te Tonga, Ngāi Tahu me Kāti Mamoe), supported by her whānau, friends, and kaimahi from Te Rāwhiti, stepped into the Pae Ārahi o Te Rito role, bringing her leadership strengths and a shared purpose and vision for Te Rito to the District. Meanwhile, fifty proud Te Arawa/Mataatua whānau and friends travelled to Ōtautahi to welcome Sean Vercoe (Te Arawa, Ngāti Maniapoto, Ngāti Manawa, Te Rarawa me Ngāti Ranginui) as the new Pae Ārahi o Te Rāwhiti – a celebration of continuity and new leadership. Rounding out the team, data expert Roz Surtees was appointed Pae Whakatere, bringing her analytical and organisational prowess to the role.



Graeme Vercoe's farewell (from left to right), DCJ Coxhead, former Judge of the Māori Land Court Judge P J Savage – Graeme's daughter Annmarie, Graeme, his wife Margaret, Judge Wara, and Chief Judge Fox

Honouring two decades of dedication – A farewell to Graeme Vercoe

In March 2025, we held a special court sitting to celebrate Graeme Vercoe QSM, Pae Ārahi of Te Rito, marking his 20 years of service with Te Kooti Whenua Māori and the Ministry of Justice. The event was uniquely styled as a trial, where Chief Registrar Steven Dodd called witnesses to prove Graeme had truly earned his retirement, blending heartfelt respect with good-humoured storytelling.

Whānau and colleagues spoke with admiration of Graeme's tireless dedication, visionary leadership, and remarkable attention to detail. His generosity and compassion have left an enduring

legacy - one that will inspire those who had the privilege to work alongside him for years to come.

International connections – Welcoming Taiwan's Legal Aid Delegation

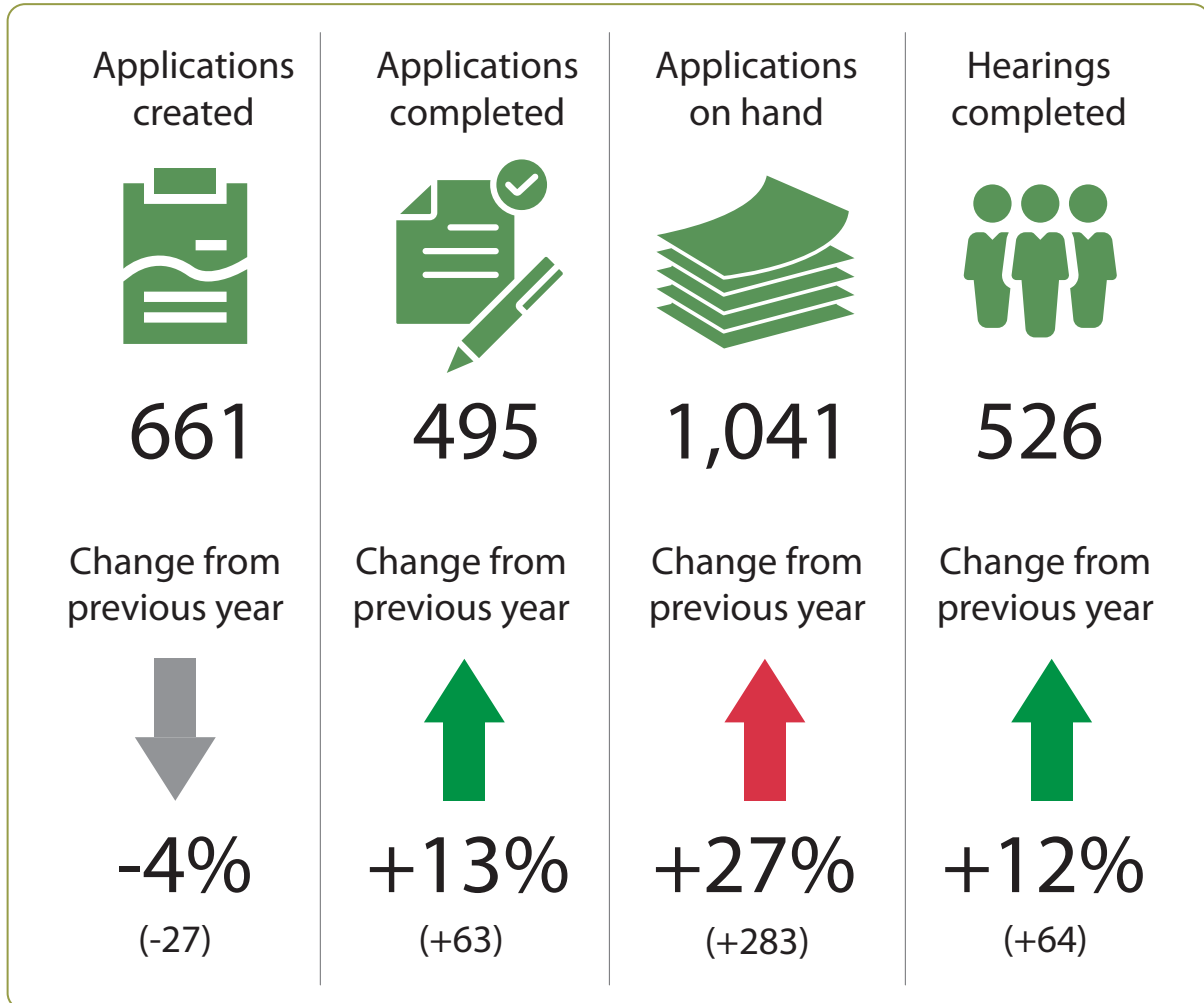
In April 2025, Waiariki had the privilege of hosting a delegation from the Legal Aid Foundation of Taiwan. Facilitated by Deputy Chief Judge Coxhead, the visit offered our guests a deep dive into New Zealand's legal aid system – its structure, strategies, and the ways it serves Māori communities. This exchange enriched both sides and opened doors for ongoing international collaboration.



Tairāwhiti - Gisborne

19 kaimahi
1 resident judge
5,455 landblocks

280.883 hectares
434,838 owners



Enhancing community service

Over the past year, our primary focus has been delivering the best possible service to the community while integrating new initiatives and prioritising the wellbeing of kaimahi through challenging times. A key driver of this progress has been our new Information Services team, which has led engagement with customers, allowing other kaimahi to dedicate their efforts to advancing cases through to Hearings with our Judiciary.

A new home for our tari

After years of dealing with persistent leaks – worsened by Cyclone Gabrielle – our tari relocated to new premises at 37 Gladstone Road, Gisborne. This swift and efficient move stands as one of the fastest transitions within the Ministry, and introduced a new way of working across three levels.

Designed in collaboration with the Ministry property team, the new space features commissioned artwork from Tā Derek Lardelli and now provides an environment befitting kaupupuri whenua and all users of the Māori Land Court. The full record of the Tairāwhiti Māori Land Court

has been seamlessly and securely transferred to its new location, thanks to the dedication and commitment of all involved. Additionally, all Te Whare O Te Rā artwork has been relocated to Te Rā Tū.

To celebrate the new premises, we took the opportunity to host this year's Matariki event, welcoming friends from partner agencies, including Te Puni Kōkiri and Te Tumu Paeroa (hosting), to join in the festivities.

Building a resilient future

In response to the devastating impact of Cyclone Gabrielle, the Future of Severely Affected Land project has become a vital priority for the

Tairāwhiti region. This initiative focuses on long-term mitigation strategies, addressing the urgent need to relocate marae, housing, and essential infrastructure from areas that were heavily impacted or are now uninhabitable.

Beyond immediate recovery, this work is centred on building resilience, ensuring the safety and sustainability of our communities for generations to come. The project remains an ongoing effort and will continue to be a core focus for Tairāwhiti as we collectively navigate the challenges posed by climate change and natural disasters.



Sir Derek Lardelli and Chief Judge Dr Caren Fox during the blessing ceremony

Opening of Te Rā Tū – The new Tairāwhiti Māori Land Court

In the early hours of 29 November 2024, approximately 100 people gathered to witness the opening of Te Rā Tū, the new Tairāwhiti Māori Land Court. Led by Sir Derek Lardelli and his team of kaikarakia, the blessing and official ceremony infused the space with the wairua of the iwi of Tūranga-nui-a-Kiwa and the surrounding tribes. This new court stands as a powerful reflection of the region's voyaging, settlement, and cultural traditions, providing a place where visitors can immerse themselves in its rich tikanga.

Following the opening ceremony, a special sitting was held, attended by Chief Judge Dr Caren Fox, resident judges Judge Wilson Isaac and Judge Nathan Milner, Deputy Chief Judge Coxhead, Judge Mullins, Judge Thomas, and Māori Land Court's Pae Matua Steve Gunson. Chief District Court Judge Hemi Taumaunu also joined the proceedings, alongside iwi leaders, Her Worship the Mayor Rehette Stoltz, officials



People gather before sunrise outside the new Māori Land Court premises

from the Ministry of Justice and Te Puni Kōkiri, as well as former and current staff and invited guests.

The new Māori Land Court office spans three floors, each thoughtfully designed to support the needs of kaimahi and the community:

- Te Rā Tau (Ground Level) – reception and research facilities
- Te Rā Pae (First Level) – mediation and meeting rooms, along with staff offices
- Te Rā Tū (Second Level) – courtroom and judicial chambers

This new space brings significant practical improvements, ensuring it is fit for purpose well into the future. The expanded reception area now offers a larger research space, and the new mediation rooms provide a welcoming and private environment for visitors. Of particular importance to a court of record, the addition of essential archive storage ensures the Court record is safely housed, preserving this invaluable taonga for generations to come.



Tākitimu - Hastings

15 kaimahi
1,466 landblocks

88,151 hectares
93,600 owners

Applications created



459

Change from previous year



-43%
(-198)

Applications completed



297

Change from previous year



+48%
(+142)

Applications on hand



1,096

Change from previous year



+27%
(+298)

Hearings completed



650

Change from previous year



+46%
(+296)

Strengthening our commitment and service

Over the past year, a key priority for us has been to foster enriching experiences as a team, and remaining steadfast in our values – community, cultural celebration, and customer support. Despite the challenges of addressing a backlog of applications whilst processing new ones coming in, we focused our energies to ensure that customer needs are not overlooked and remain an essential aspect of all we do. Thanks to the dedication of our Court staff

and the Judiciary, we continue to tackle past issues while building a more efficient and responsive support system for the future.

A vibrant cultural celebration

Tākitimu staff proudly participated in Maranga Mai, a kapa haka event at Te Kura Kaupapa Māori O Te Ara Hou. We will be joining forces with Te Puni Kōkiri, NZ Police, Hastings District Court, Napier District Court, Kaiarahi, and the Department of Internal Affairs in a powerful

display of Māori culture and unity. Other agencies participating in the event included the Ministry of Education, Ministry of Social Development, Oranga Tamariki, Te Whatu Ora, Ara Poutama, Kāinga Ora, and Te Tari Taiwhenua. Taking place

at the end of June 2025 in celebration of Matariki, the event exemplified our dedication to preserving cultural heritage whilst strengthening connections and collaboration across sectors.



Kaimahi from different government agencies practicing for Maranga Mai

Future of Severely Affected Locations (FOSAL) - Kaupapa Māori Pathway

This year MLC staff were contacted by Meipara Poata from the Cyclone Recovery Unit at the Department of Prime Minister and Cabinet (DPMC). Her team is supporting Māori landowners and marae in Tākitimu and Tairāwhiti whose land has been classified as Category 3 due to unmitigable future risks from severe weather events. The initiative provides funding for relocating marae and residential structures.

A working group comprising DPMC and Court staff was formed to assist affected landowners. Our Pae Manawa has played a vital role in providing public Court Record information, guiding local whānau, hapū, and iwi through Court processes. She has also helped expedite applications to ensure the Court does not hinder access to Crown funding.



Aotea - Whanganui

34 kaimahi
4,218 landblocks

474,682 hectares
738,852 owners

Applications created



969

Change from previous year



+5%
(+44)

Applications completed



691

Change from previous year



+8%
(+53)

Applications on hand



2,361

Change from previous year



+39%
(+911)

Hearings completed



1,181

Change from previous year



+28%
(+326)

Navigating 2024 together

As we stepped into 2024, Aotea faced significant challenges—seven vacancies and a growing workload of new and aged applications. Yet, through resilience and unity, we moved forward—welcoming new faces, honouring long-serving team members, and deepening our connection with the communities we serve.

Milestones and mahi – celebrating our people

This year brought some big moments. Oliver Bailey and Cathryn Kilmister completed their

training to become Deputy Registrars—fresh energy in their critical roles as Pae Tukutuku. A heartfelt highlight was the recognition of Marie Waldren's extraordinary 50 years of public service, celebrated with an award presented by Chief Operating Officer Carl Crafar on behalf of Te Kawa Mataaho. He tino whakahirahira tēnei!

Wellbeing in Action: Te Hauora o Ngā Kaimahi

Our wellbeing isn't just a value – it is a practice. With guidance from our Hauora committee, led by kaimahi, Pae Manawa, and Judge Thomas, we

have brought Te Whare Tapa Whā to life through action and connection.

Some of our highlights this year:

- ▶ Launching a mixed twilight netball team – energy and team spirit combined!
- ▶ Tackling the Awa Relay (Ka Waewae Tātahi o te Awa Tupua)
- ▶ Celebrating Pūanga with the Whanganui community

These initiatives have lifted our hauora and reinforced our commitment to a thriving, supportive workplace.

Looking Ahead: Honouring the Past, Embracing the Future

As we prepare for what's next, we pause to remember beloved hoa mahi who have passed, and acknowledge the retirement of Graeme Vercoe in March 2025 – a farewell to a respected leader and friend after 20 years of dedicated service at the Māori Land Court.

We're also excited to host the Papatūānuku biennial event in November 2025, a chance to bring our values to life and celebrate the power of collective purpose.



MLC Judges and kaimahi, Waitangi Tribunal, TPK, and TTP staff

He Hononga ki te Whenua: Strengthening Our Connection to the Land

Staying connected to tangata whenua means being present on the whenua. Our kaimahi got out into the rohe, building relationships the way it matters most – kanohi ki te kanohi.

- ▲ Richard Bennett and Judge Thomas met with trustees of the Awarua block (Rangiwahia), nurturing shared kaitiakitanga.
- ▲ Oliver Bailey joined owners of the Taumatamahoe block (Whanganui) for an unforgettable jet boat journey to kōrero about the Riparian Planting initiative – a true adventure in manaaki and mahi.

Rātana 25th Celebration

The Rātana 25th Celebration was a vibrant and deeply meaningful event that brought together whānau, kaimahi, community leaders, iwi leaders, and politicians in honour of the rich heritage and enduring legacy of the Rātana movement. It provided a valuable opportunity for our team to connect directly with Māori landowners, strengthening our relationships, and reaffirming our commitment to partnership, service, and cultural respect. Through participation in this

significant gathering, we not only celebrated the past 25 years of Rātana's impact but also reinforced our dedication to supporting the aspirations and wellbeing of the communities we serve.

Te Matatini o te Kāhui Maunga

At Te Matatini o Te Kāhui Maunga, the Māori Land Court team shared a stall with Te Puni Kōkiri, Te Tumu Paeroa and the Waitangi Tribunal, reflecting our collective commitment and passion for supporting our people, their land, and their kōrero by responding to their enquiries ranging from funds held, funding options for papakāinga and housing infrastructure, to submitting applications through Pātaka Whenua.

This approach proved highly successful, attracting over 70,000 customers to the stall, and resulting in more than 100 written enquiries received in Pātaka Whenua. It was a vibrant and rewarding experience, made even more significant by the opportunity to collaborate with other providers of services to Māori.



Te Waipounamu - Christchurch

19 kaimahi
2,339 landblocks

66,154 hectares
200,341 owners

Applications created



640

Change from previous year



+20%
(+128)

Applications completed



319

Change from previous year



+18%
(+59)

Applications on hand



1,587

Change from previous year



+28%
(+449)

Hearings completed



519

Change from previous year



+11%
(+56)

Full team, full mahi

Despite the challenges we've faced, the past year has been filled with achievements for our Te Waipounamu team. A major factor in our success has been finally having a full team in place, with key roles now filled, including Info Services, Kuhu Mai, Poutama, Court Taker, Pae Manawa, and Purapura Whetū. What makes our tari special is the chemistry we share, and the way we work together as a collective. We celebrate birthdays and special occasions, grow our mātauranga through regular whakaari pūrakau and reo sessions, and engage with each other over significant

events in te ao Māori, such as Te Matatini and the coronation of Nga Wai Hono I Te Po.

A year of achievements

Our Tu Mai team and Pae Tohutohu have significantly reduced the Orders backlog, alongside our contributions to clearing the registration backlog. We've also facilitated numerous meetings of owners, resolving longstanding applications and historic matters.

Our Kuhu Mai kaimahi have worked tirelessly to reduce the number of aged cases while continuing to process new applications for regular courts.

Meanwhile, our court taker has played an integral role in eliminating the minutes backlog, ensuring a smooth workflow. Throughout this, strong relationships with our district judges have been essential in managing increasingly complex applications.

Our SILNA team has made historic strides in determining ownership in the Toitoi block. They have successfully located the uri for all but one of the original owners in Hāwea/Wānaka, and are now preparing for a meeting of assembled owners to decide the future of this whenua.

Strengthening connections

We have worked hard to maintain relationships with stakeholders across our expansive rohe. While kanohi ki te kanohi services are not always possible due to distance and travel costs, our small but dedicated team makes the most of every opportunity to engage with whānau.

The introduction of our two-person Info Services team has been instrumental in rebuilding trust within our community after a period of disruption. Highlights from the year include:

- hosting a stall at Hui-a-Iwi in Kaikōura alongside TPK and IRD
- attending Ipukarea in Nelson
- establishing regular pāneke in Rolleston
- holding wānanga in Te Tau Ihu, Kaikōura, and Rēkohu/Wharekauri

Looking ahead

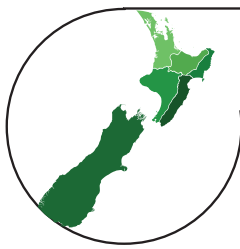
As we move into the new year, we look forward to the ongoing evolution of the Court, keeping a close eye on potential legislative changes, the development of Pātaka Whenua, and the needs of Māori landowners.



Left: The Te Waipounamu team at its team planning day



Below: Some of the team getting ready to deliver Christmas in Ōtautahi



Te Whakamaene

Specialist Application Team
12 kaimahi

Māori Appellate
Court applications
created



24

Change from
previous year



+25%
(+6)

Māori Appellate
Court applications
completed



3

Change from
previous year



-58%
(-4)

Māori Appellate
Court applications
on hand



25

Change from
previous year



+28%
(+7)

Collaboration and agility in action

The Specialist Applications Team has remained steadfast in its commitment to excellence, delivering strong results across its core responsibilities.

Despite staff turnover, evolving work pressures, and tighter deadlines, Te Whakamaene has shown remarkable adaptability and dedication to its mission. By harnessing strong team cohesion and unwavering peer support, we have maintained momentum by adjusting workflows and redistributing workloads to ensure seamless and timely service delivery.

These efforts have led to the resolution of several longstanding cases before the Court, with a renewed focus on advancing older matters to

hearing. Subtle yet strategic refinements in our approach have produced meaningful, positive outcomes for court users.

Judicial support and guidance

Earlier this year, we had the privilege of welcoming Deputy Chief Judge Coxhead, who joined us to support the work of the Chief Judge. The clear direction and priorities set by Chief Judge Fox and Deputy Chief Judge Coxhead have been instrumental in the efficient progression and resolution of cases. We deeply value the strong and collaborative relationship we share with the judiciary, ensuring justice is delivered effectively and efficiently.

Chief Judge
applications
created



82

Change from
previous year



-33%

(-41)

Chief Judge
applications
completed



35

Change from
previous year



+37%

(+13)

Chief Judge
applications
on hand



309

Change from
previous year



0%

(0)



Te Whakamaene
team

Whakawhānaungatanga

As a nationally distributed team of specialists, our members are spread across the Māori Land Court's seven regional offices. While we strive to minimise emissions and thus long-distance travel, we cherish the moments when we can come together. Recently, we had the privilege of doing just that – gathering in Whanganui for a hikoi to sites of special significance to Māori. Visiting places like the Ratana settlement and Te Awa Tupua deepened our connection to the whenua, providing a meaningful opportunity to

reset, plan for the year ahead, and strengthen our team bonds.

Honouring Danielle (Pinkie) Hika

Sadly, 2025 also brought the loss of a beloved colleague, Danielle (Pinkie) Hika. Pinkie will always be remembered for her warmth, dedication, and the lasting impact she had on all who worked with her. E moe i te rangimārie, i raro i te korowai aroha—ka ngaro koe i te tirohanga, engari kei roto tonu koe i ō mātau ngākau.



Te Waharoa - Auckland

Auckland Information Office
7 kaimahi



The Te Waharoa team with some of our Judges

Auckland Information Office

Since September 2024, the Information Office in Ellerslie has been operating at full capacity with four Pae Tukutuku in place.

Due to ongoing high-risk security incidents, we transitioned to an appointment-only system for in-person services in December 2024. Customers can schedule up to eight daily appointments, each lasting between 30 minutes and an hour. We continue to offer phone (including call-back services), email, and online enquiries. Our appointment system is running smoothly, and we encourage customers to call ahead before visiting Ellerslie to ensure safe access to our services. Our dedicated kaimahi provide thoughtful and thorough support, ensuring a quality experience for all.

Application registration project

In December 2023, we launched a nationwide initiative to address the backlog of applications awaiting registration. Thanks to collective efforts, the backlog has been successfully cleared, and all applications submitted up to 12 January 2025 have been registered as of 13 March 2025.

This project involved key contributions from:

- the Ministry of Justice's Central Registry team
- the newly established specialist Te Whare Māhoi team
- a centrally managed overtime initiative, later adjusted to a district-centric approach
- support from project and reporting experts within the ministry's RSD teams
- Te Waharoa, which managed the final back-end processes to complete the project.

This achievement highlights the power of collaboration across our teams, reflecting positively our ability to work collectively with great efficiency.

Above all, we extend our sincere gratitude to Māori landowners for their patience throughout this process. The previous ten to twelve months of wait time has now been significantly reduced, and we remain committed to further improvements to ensure faster and more efficient services for landowners.

Ngā Whakataunga a ngā Kooti/ Notable judgments of the Court

From July 2024 to June 2025 the Māori Land Court, Māori Appellate Court and Chief Judge issued 96 reserved judgments. All Court judgments are available on the Māori Land Court website.

Here is a selection of significant judgments issued over the past year.

Kawhia – Waioamatatini C & Wairoa 1A (Aggregated)

(2024) 126 Tairāwhiti MB 196 (126 TRW 196)

Māori Land Court, Judge Thomas

A decision on an application for the variation of the Waioamatatini C & Wairoa 1A Trust (the Trust). There was a proposed new trust order filed based on the standard Tairāwhiti trust order template (the STTO). The trustees sought a number of variations to this standard trust order, to remove cl 25 of the standard trust order, which establishes a pūtea account for unclaimed dividends. The trustees submitted that there was no authority requiring the Trust to include cl 25. Additionally, if cl 25 was to stay, they sought to vary the clause to allow for them to borrow up to 80% of the unclaimed dividends. The purpose of the change was to ensure that unclaimed dividends do not become an unrealistic commercial burden on the Trust.

Judge Thomas in her judgment discussed that while the legislation does not specifically require an ahu whenua trust to have a pūtea account to hold unclaimed dividends of beneficial owners, s 215(5) provides that the land, money and assets of an ahu whenua trusts shall be held in trust for the beneficial owners entitled to the land in proportion to their several interests in the land. Her Honour also noted the trustees' duties under s 223 of Te Ture Whenua Māori Act 1993 and ss 26 and 27 of the Trusts Act 2019, including the fundamental requirement to act in good conscience, the duty to safeguard trust property, the duty to act impartially between beneficiaries and the duty to distribute trust property correctly.

Judge Thomas found that cl 25 of the STTO serves the purpose of being a provision which manages the trustees' obligation to hold funds on behalf of the beneficiaries to be kept safe for them

and not be absorbed into the finances of the Trust's operational budget. Judge Thomas also found that the proposal for the trustees to be able borrow up to 80% of the unclaimed dividends would not benefit beneficiaries directly, nor did it further the objects of the trust, but would benefit the trust itself, and accordingly it seemed to be outside the scope of the trustees' powers.

Held, Judge Thomas made orders per s 244 amending the proposed trust order to include cl 25 of the STTO. Her Honour noted that the removal of cl 25 altogether would require a reasonable alternative clause in the trust order for how unclaimed dividends are to be kept separate and managed, and that has not been provided.

Tautari – Succession to David Hugh Peters (2024) 275 Taitokerau MB 263 (275 TTK 263)

Māori Land Court, Judge Williams

A preliminary judgment on an application for succession filed by the executors of the Estate of David Hugh Peters. The deceased did not have any natural children, and he had 10 siblings. The main issue in contention was cl 7.2 of the deceased's will, which provided his de facto partner and her adopted daughter free use of his shares and home in Oriwa 1B1 block. The daughter, Ms Peters-Hart, also sought to be recognised as a whāngai daughter of Mr Peters.

In terms of the question of her recognition as a whāngai, Ms Peters-Hart filed an affidavit and spoke at the hearing about her relationship with Mr Peters. She asserted that he has played a strong fatherly role in her life, and he gave her the mental and physical support and protection a father would. She acknowledged that at no time had she called him 'dad' or 'father' and that despite her asking if he would adopt her, he said he could not

due to his Māori blood. The alternative, she said, was her name change to Alyse Peters-Hart, which she asserts was a blessing of her by Mr Peters. This finding was opposed by whānau members of the deceased, who submitted that Ms Peters-Hart had no blood relationship with the deceased, was not described as a whāngai by him, and was not integrated into the whānau or hapū.

Held, the building at Oriwa 1B1 was not the principal home of the deceased and therefore the clause in the will giving use of the home to Ms Hart cannot be fulfilled under s 108A(2)(a) and is null and void.

The Court found that, based on the evidence provided, Ms Peters-Hart is to be recognised as a whāngai of the deceased. Judge Williams found that “I was left in little doubt that Alyse was fed, nourished, brought up, fostered, raised, nurtured, and reared by David consistent with tikanga Māori. It is the relationship between David and Alyse that is the key focus and not what the extended whanau perceived to be the relationship. I am therefore of the view that Alyse should be recognised as a whāngai of David.” He also found that “I also cannot ignore the fact that David has sought to provide Alyse with the same interests in Oriwa 1B1 that he has to his de facto partner if she were to predecease him. I consider that he sought to provide for Alyse as if she were a whāngai despite not referring to her as such”. Such recognition would not affect the ownership of the deceased’s Māori land shares, as it was clear that there was no descent relationship between them, but it was still open to the Court to give effect to the deceased’s wish that income from his shares in Oriwa 1B1 go to Ms Peters-Hart under s 116 of the Act.

Herewini – Succession to Ra Herewini **[2024] Chief Judge’s MB 1103 (2024 CJ 1103)**

Māori Land Court, Chief Judge Fox

Decision on an application under s 45 of Te Ture Whenua Māori Act to cancel a 1974 succession order to Mr Ra Herewini. In the 1974 order the deceased’s wife succeeded to his land interests, and subsequently gifted her interest in Kaikou C1A1B to her daughter (the applicant’s sister) and her partner. The applicant, a son of the deceased, claimed that he was adversely affected by this order because he was brought up on the farm, and

to have the land taken away from him and his sons would go against his father’s kōrero, tikanga and Te Ture Whenua Māori Act.

Held, application declined. While there was a mistake in the presentation of the facts to the Court, namely that it was not stated that the deceased had children, it is not in the interests of justice to remedy this error. The order was made in 1974, at which time spouses along with children of a deceased could inherit and orders could be made for succession and vesting of land interests under s 78A of the Māori Affairs Amendments Act 1967. At the time, the order was not challenged, and none of the applicant’s siblings have supported his challenge to the 1974 succession.

Regarding tikanga issues raised, namely the applicant’s status as the first-born male of the whānau, Chief Judge Fox noted that the applicant is not the tuakana of the whānau. His sister, who received the land interests by way of gift, is the eldest, and no evidence was provided as to why the applicant’s status as the first-born male trumped his sister’s status as tuakana under tikanga. Chief Judge Fox also noted other relevant tikanga values such as the rights of ahi kā for the sister and her partner, who have resided on and looked after the land for many years following the 1974 order. However, Chief Judge Fox did note that the sister should recognise that her siblings, nephews and nieces are entitled to see the land as a taonga to which they are attached by whakapapa and that she as kaitiaki should find a way of including them in the land, and invited her to consider establishing a whānau trust.

Wainui v Wainui – Part Lot 1 Deposited Plan (2024)

127 Tairawhiti MB 150 (127 TRW 150)

Māori Land Court, Judge Milner

Decision on an application for an interim injunction, as part of ongoing proceedings concerning a review of trust. The homestead at the centre of the case had been severely damaged by Cyclone Gabrielle, and in the wake of this destruction, steps needed to be taken to protect the homestead against future extreme weather events. To this end, the applicants had arranged for the homestead to be raised. The respondents opposed the raising of the house, and obstructed this work being carried



Damage from 2023's Cyclone Gabrielle

out. The applicants sought the interim injunction to prevent the respondents from further preventing the work to raise the homestead. The situation had a degree of urgency, as the contractor who was available to raise the homestead, along with other houses in the area, was only available to undertake this work in a limited time period. It was also uncertain if there would be any more funding for future work if the raising of the homestead was deferred.

Held, interim injunction granted. In terms of the test for an interim injunction, Judge Milner concluded that there was a serious question to be tried in terms of the management and ownership of the homestead. In terms of the balance of convenience and interests of justice, Judge Milner decided that if the homestead were not raised and protected from further flood damage, the issues as to the ownership of and right to occupy the homestead would be rendered redundant. It was therefore appropriate to allow the injunction so that the house could be raised.

Watson v Day – Proprietors of Torere 64 Incorporation

[2024] Māori Appellate Court MB 183 (2024 APPEAL 183)

Māori Appellate Court, Judges Milroy, Warren and Williams

Appeal of a decision declining to grant an investigation into the Proprietors of Tōrere 64 Incorporation, following an application under s 281 for officers of the Incorporation to attend Court to address alleged non-compliance with statutory requirements. The issue on appeal was whether the Māori Land Court exercised its discretion under s 281 of the Act correctly.

The Appellate Court set out the process to follow in exercising the Court's powers under s 281 to require officers of an Incorporation to attend the Court to explain issues of non-compliance with statutory requirements. Section 281 expressly provides the Court with the power 'at any time' to require an officer of an incorporation to attend and explain any acts or omissions of the kind listed in s 281(1). The statute does not specify any conditions that might apply prior to the use of that power, but clearly there must be something that alerts the Court to issues or concerns which require some explanation. That power may be exercised as a result of perusal by the Judge or the Registrar of the statutory reports and resolutions that are required to be filed by the Incorporation, or a concerned shareholder may apply under s 281. Given the serious nature of the remedies available to the Court under s 280(7), which follow on from a finding by the Court that the explanation given by the COM for any act or omission is unsatisfactory, the Court's deliberations in an application under s 281 should proceed through the following steps:

- (a) The Court must first consider whether the complaint made by the applicant is of such a nature as to raise the possibility that one or more of the remedies set out in s 280(7) may be ordered, if some or all of the allegations made by the applicant are proven. The allegations will need to be supported by sufficient credible evidence to raise a reasonable possibility that the remedies under s 280(7) will be considered by the Court.
- (b) If so, then the Court is required to determine whether to exercise its discretion under section 281 to require any officer of an incorporation to attend and explain any act or omission of the kinds set out in s 281(1). The more serious the allegations and the better the evidence filed in support, the more likely it is that the exercise of the discretion will move from a possibility to a certainty.
- (c) If the Court determines to exercise the discretion under s 281 then a direction will be issued requiring the incorporation to respond. Once the incorporation's response is filed the applicant must then be given an opportunity to reply to the incorporation's evidence and submissions in accordance with the rules of natural justice.

The Appellate Court noted that it is possible for all these steps to be completed on the papers and that attendance in person may be dispensed with where the Judge considers that there are no issues that properly require an in-person hearing. Where a judge directs an incorporation to respond to allegations made in an application, the judge is clearly calling for an explanation in accordance with s 281. The filing of documents in response constitutes an attendance by the incorporation. There may however be good reasons to hold an in-person hearing – for instance where the Judge considers that further questions may clarify the matter, and/or assist in determining next steps in the process. After considering the evidence and submissions made, the Court is then in a position to determine whether to investigate further or whether there is sufficient evidence before the Court to make a final decision either to dismiss the application or to order one or more of the remedies set out in s 280(7).

Held, appeal allowed. The Appellate Court found no serious fault in the way the Incorporation responded to the directions given by the Judge in the original proceedings. However, natural justice requires that the applicant should have been given the opportunity to reply to the Incorporation's evidence and submissions, especially given the seriousness of the allegations. Furthermore, the Incorporation acknowledged that some material was missing from their evidence, which should have indicated to the MLC that further investigation was warranted, and a substantive hearing might need to take place. Subsequent findings of the Court in a strike out application relating to the application for removal of the COM also revealed that there were serious questions to be tried, which should have triggered a substantive hearing. Application for investigation sent back to the lower court to be consolidated with the related s 269 application for removal of the COM.

Sycamore v Kusabs – Paenoa Te Akau B **[2024] Chief Judge's MB 1323 (2024 CJ 1323)**

Māori Land Court, Deputy Chief Judge Coxhead

Decision on an application to amend or cancel several orders relating to partition orders made in 2015 and 2017.

Between 1955 and 1961 a number of partition orders were made in regard to the Rangatira 8A block. As a result of a Royal Commission inquiry in 1974 most of the partitioned blocks were incorporated to create the Paenoa Te Akau block (the block). In 2012 the Court granted partition orders for this block to create Paenoa Te Akau B, with this partition commonly referred to as the Dansey Partition. The application relates specifically to the three orders made amending the Dansey Partition. A part of the concern is that the original area sought by Dansey was 6.1045 hectares, and the final area of the partition was 8.3043 hectares.

The applicant submitted that the Dansey Partition was made in error as the order was 2.1988 hectares in excess and at odds with the initial grant of partition in 2012; the approval of the partition was based on erroneous information presented to the Court and there were omissions of information about the impact of the survey on the owners; and the Court failed to notify the affected parties, including adjoining owners, of the survey discrepancies and changes to the 2012 partition. This has led to the neighbouring whānau boundaries, including those of the applicant, being prejudicially altered. It was further submitted that there is a need to get the survey of the partitions correct to enable all the owners to occupy their whānau land without unfair detriment.

Held, the partition order dated 17 September 2012 was amended by cancelling the amendment to those orders made in 3 March 2015, 20 November 2015 and 26 May 2017, and directions were made for a new survey to be undertaken with the consultation with beneficial owners. The trustees were directed to convene wānanga and hui of the beneficial owners and confirm boundaries for each division of Rangatira 8A where a representative for each division of Rangatira 8A should be elected from amongst those whānau. The Court found that the requirements of s 288 of Te Ture Whenua Māori Act 1993 were not met in the approval of the final survey plan for the partition, there was no sufficiency of notice or support

of the owners and there was insufficient opportunity for the owners to discuss and consider the partition in terms of the amended area, location and boundaries of the partition. On the balance of probabilities, the Court erred in fact and in law by not ensuring that any amendments to the orders reflected what was granted and intended by the Court. Further, the approval of the survey plan was based on erroneous information presented to the Court and the omission of information about the impact of that survey on other owners. It is therefore in the interests of justice to remedy the errors identified.

Rapana v Anderson - Te Kōmiti Matua o te Haahi Ratana

(2024) 492 Aotea MB 95 (492 AOT 95)

Māori Land Court, Judge Stone, sitting with pūkenga Professor Tom Roa and Che Wilson

Decision on an application for the determination of which of two Komiti Matua is the appropriate representative of Te Haahi Rātana (Te Haahi) per s 30 of the Act. This decision being between the incumbent Komiti Matua (applicant Komiti) and the new members selected in 2020 (respondent Komiti). The Māori Appellate Court having established that the Court has jurisdiction under s 30 of Te Ture Whenua Māori Act 1993 in relation to Te Haahi, and the parties agreed on the legal principles and that the Court should determine the appropriate representatives of Te Haahi. This matter was heard by Judge Stone along with two pūkenga appointed to sit as a part of the Court under s 32A of the Act.

The Court observed that in order to understand what led to this application it is necessary to understand the structure of Te Haahi. Ngā pou o Te Haahi include the Tumuaki (the head of Te Haahi), the Hui Whakapūmau (Synod, being the policy making body), the Rūnanga (counsel of apostles, comprised of twelve pillars) and the Komiti Matua (Church Executive Committee). Te Haahi operates under a constitution called Ngā Kaupapa o Te Haahi Rātana, which is commonly referred to as Ngā Kaupapa ā-Mahi. Te Haahi has made several changes to their structure in response to significant events. The Court reviewed the timeline of these changes and Hui Whakapūmau from 2017 to the present day, and their impact on the Komiti Matua.



Ratana Pa

Held, neither Komiti Matua is the appropriately constituted representative of Te Haahi, as neither are currently constituted in accordance with Te Haahi's constitution, Ngā Kaupapa ā-Mahi. A new Komiti Matua must be convened under Ngā Kaupapa ā-Mahi. Ngā Kaupapa ā-Mahi sets out how the members of the Komiti Matua are selected and the officers that are to be appointed from within that membership. The Kaupapa ā-Mahi can only be amended through Hui Whakapūmau and then by the Tumuaki. In 2019, the resolutions made at that year's Hui Whakapūmau that the membership of the Komiti Matua from 2020 was to include representatives of five specified regions became embodied in Ngā Kaupapa ā-Mahi. It was found that the election of the respondent Komiti at the 15 March 2020 AGM did not comply with Ngā Kaupapa ā-Mahi, as it did not include these regional representatives. In terms of the Hui Whakapūmau that was postponed from Easter weekend to October 2020 due to COVID restrictions, the Court found that this Hui was properly convened, but that the decision to appoint members to the Komiti Matua other than those selected at the March AGM was not an option available to Hui Whakapūmau under Ngā Kaupapa ā-Mahi.

As the Court's decision meant there was no properly constituted Komiti Matua in place it provided the following suggestions as to moving forward: (a) A special Hui Whakapūmau is required, which is to be agreed to through the Tumuaki and can be facilitated by an independent facilitator or by the applicant Komiti; (b) If the applicant Komiti convenes a special Hui Whakapūmau it should liaise with the respondent Komiti, with details ideally to be mutually agreed between the parties; (c)

the mōrehu of Ratana Pā should select the Komiti Matua members at an AGM prior to the Hui Whakapūmau in accordance with Ngā Kaupapa ā-Mahi, and should ensure (in accordance with the 2019 amendment) that the membership includes a representative from Arepa, Omeka, Piriwiritua, Hamuera and Ahitereira; and (d) the members selected at the meeting of the mōrehu of Ratana Pā ought to then be submitted to the special Hui Whakapūmau for confirmation, to hold office until the next Hui Whakapūmau at Easter 2025.

Julian v Inia - Succession to Moehuarahi Te Ruuri

(2024) 322 Waiariki MB 32 (322 WAR 32)

Māori Land Court, Judge Warren

A decision following the reserved decision of *Julian v Inia – Succession to Moehuarahi Te Ruuri* (2024) 309 Waiariki MB 197-224 (309 WAR 197). The first decision found, in an application under the Family Protection Act 1995 (FPA), that Moehuarahi Te Ruuri breached her moral duties at tikanga by not making adequate provision for all her children in her final will. This decision determined the distribution of Moehuarahi's whenua Māori interests amongst her eligible uri.

The applicants submitted that the Court should adopt an equality approach, whereby all uri should receive equal shares in their mother's lands. It was further argued that a common-sense approach should be taken to ensure a practical lens is applied. The respondents submitted that the Court should adopt a *de minimis* approach whereby the deceased's will should not be unduly altered. The respondents submitted further that the *de minimis* approach best suits the rangatiratanga of Moehuarahi, which is a significant factor in determining the extent to which the Court should disturb her wishes as expressed in her will.

The Court followed the approach normally taken when considering FPA claims in that the successful party to a FPA claim receives a percentage of the estate where it has been found that the testator breached their moral duty. The minimum amount of a percentage award is 10 per cent. However, this may be higher where the Court considers that there is a breach of moral duty, including financial need, moral and ethical considerations and there is a need for proper

maintenance and support. The rangatiratanga submissions reminds the Court that adequate remedies in this matter are to be considered in a Māori context. The tikanga principles and values applied in the first judgment have a flow-on effect to the determination of remedies and the 'metaphoric wharenuī' described there is beneficial to use in this judgment to ensure a consistent approach is maintained. The Court noted that whakapapa, whanaungatanga and mana remain central to any remedy to be applied in a FPA claim, to ensure that the Court is making mokopuna decisions ("including an eye to ngā whakareanga o mua, o ināianeī, me te āpōpō"). As Moehuarahi's estate is exclusively 'whenua tūpuna', the tūpuna element places weight on whakapapa.

Held, the Court determined that 25% of Moehuarahi's estate was to be divided between her eligible uri who did not receive any interests under her will. The surviving child who received interests under Moehuarahi's will is entitled to 75% of the estate. Succession orders were also made stipulating the percentage awards from the estate. The Court found a *di minimis* approach helps restore and respect the mana of Moehuarahi as it maintains her wishes whilst remedying the need to enhance a whakapapa and spiritual connection to her uri, through shares in their ancestral land.

Skipper v Gibson – Ngāti Tawhirikura Hapū Charitable Trust

(2025) 498 Aotea MB 148

Māori Land Court, Judge Warren

A preliminary decision on applications for an inquiry into the administration of the Ngāti Tawhirikura Hapū Charitable Trust (the Trust). This decision concerned whether the Court had jurisdiction to address the claims filed, as the Trust is a charitable trust and was not constituted under Part 12 of Te Ture Whenua Māori Act 1993 (the Act).

The Trust owns the Aotere pa site, which was returned to Te Atiawa as part of their Treaty settlement with the Crown and is general land. The sole issue for the Court's consideration was whether the charitable trust falls within the Court's jurisdiction under s 236(1)(c) of the Act, being a trust that holds 'general land owned by Māori', having regard to the Supreme Court's interpretation of this

provision in its decision in *Nikora v Kruger* [2024] NZSC 130. The Court noted that the *Nikora* decision did not provide an open-door policy for all trusts of any kind to come within the Māori Land Court's jurisdiction, but rather those trusts where the purpose, provisions and land holding status of the relevant trust aligned with the purposes and principles of the Act. In its determination of jurisdiction, the Court considered that there were two streams of analysis required, being: (a) whether the trust, being a Charitable trust, needs to be a 'purely tribal trust' for it to fall under the court's jurisdiction; and (b) whether, as an incorporated charitable trust, there is a beneficial estate in fee simple vested in someone who is Māori or a group of persons where the majority are Māori.

The Trust holds land for a charitable purpose, rather than on behalf of specified beneficiaries. However, the Court noted that throughout the Trust deed there are many references to the Trust being a hapū-focussed entity. This is seen in the background of the trust deed; process of reaffirmation of the trust deed; and that all trustees must be hapū members, save for the capacity to appoint as many as two independent trustees. The Trust is also required to report on steps to increase the uri of the hapū as members, with no particular focus being placed on non-hapū members. It is clear that the 2019 Trust deed places an emphasis on management and control being held by the hapū of the Trust. Therefore "the origins, its focus, its structures, deed provisions and landholdings all point towards the Trust being hapū-centric." Some of the Trust's charitable purposes extend beyond the hapū to act for the benefit of the Taranaki community generally, but the Court did not interpret the reasoning in *Nikora* as suggesting that a trust must be purely tribal in order to fall within the jurisdiction of s 236(1)(c), but that this issue is to be determined on a case-by-case basis. This is supported by the fact that the Act is not purely tribal- or Māori-centric, but it could be accepted then that the Act is predominately Māori-focussed and on that basis, there is consistency between the Act and the Trust, as in *Nikora*. Further as the trust is Māori in character being hapū-centric, the fact that some of its charitable purpose extend to non-Māori does not take away the Māori character of the class or group. The Court found then that the trust is, in essence, a 'tribal trust' and the reasoning in *Nikora* applies to the Trust.

It was also found that the beneficial estate held by the Trust is vested in the Ngāti Tāwhirikura hapū, following the reasons in *Nikora* together with bespoke considerations in a charitable trust context.

The final consideration was whether the Court's findings are novel or controversial, as this was a question asked in *Nikora*. The Court in summary provided that the decision primarily addresses jurisdictional issues without changing the general role of charitable trusts. It allows charitable trusts to continue to have matters heard in the High Court, alongside the jurisdiction found to exist in the Māori Land Court in these particular circumstances. The Court acknowledged the potential consequences of granting tribal members extra legal rights of recourse to the Māori Land Court, but emphasised that in Te Ao Māori, rights come with responsibilities. The Supreme Court's findings in *Nikora* and *Re Greenpeace of New Zealand Inc* support this decision, highlighting the evolving nature of charities law and the importance of responsiveness to societal changes.

Held, the Court has jurisdiction per s 236(1)(c) of the Act to hear and determine the claims brought by the trustees against the Trust on the basis that the Ngāti Tāwhirikura hapū is the owner of the beneficial estate in fee simple in Aotere pa, which is accordingly general land owned by Māori in terms of the Act.

Mullins – Kaitoki No 2K Sec 1 **(2025) 119 Tākitimu MB 50 (119 TKT 50)**

Māori Land Court, Judge Stone

Preliminary decision on an application to partition Kaitoki No 2K Sec 1 into six sections for the use of the applicant and her children. The applicant is the sole owner of the block. This decision addressed the preliminary issue of whether a sole owner of Māori freehold land can partition it.

The Judge acknowledged that the Court's approach to this issue has varied. Some decisions have allowed partition by a sole owner, while others have required shares to be transferred to others first. He noted that the legal concept of partition comes from English law, where it involves dividing land between co-owners. However, the Judge emphasised that partition under Te Ture Whenua Māori Act 1993 is different. Drawing on the reasoning in *Heta – Taiharuru 4C3B*, the

Court noted that partition under Te Ture Whenua Māori Act is concerned with “the rationalisation of the community of ownership, rather than its destruction”.

Held, the Act does not prohibit the partition of solely owned land, and several provisions—particularly s 290(1)(a)—support the possibility, even if indirectly. The Judge found that the purposes of the Act support allowing partition by a sole owner, especially where it facilitates retention and use of land by whānau. While partitioning could increase the risk of sale, the statutory framework provides safeguards. However, the applicant must still satisfy the normal statutory requirements for partition.

**Te Arawa Management Limited – Lot 1
DP SA 19243 (CFR SA63B/895)
(2025) 339 Waiariki MB 127 (339 WAR 127)**

Māori Land Court, Judge Wara

Application by Te Arawa Management Limited (TAML) seeking Court determination that four lots of land on Town Point Road in Maketū are general (not Māori freehold) lands. The issue

before the Court was whether the vesting of lands in a body corporate in 1933 changed the status of the land from Native (Māori freehold) to European (general) land.

Prior to 3 January 1975, the lands were Native freehold land known as Maketū A Section 3. Following a consolidation order in 1933, the lands were vested in the Te Arawa District Board effective from 10 November 1928 (the date that the consolidation scheme received approval). The lands have been owned by Te Arawa District Board and, since 2018, by TAML. Relying on the Native Land Act 1931 and the Māori Affairs Act 1953, the applicant submitted that Te Arawa District Trust Board, as a body corporate, is a ‘European’ entity. As such, by vesting the lands to a ‘European’, the lands could not retain their status as Native/Māori freehold land under the law in force at the time.

Held, application dismissed. The Court noted that, under the Native Land Act 1931 and Māori Affairs Act 1953, Native/Māori freehold land could only change status through specific processes prescribed by those statutes. As such, the mere vesting of the land to a ‘European entity’ was not sufficient to change the status of the land.

Judgment delivery

Under s 98A of Te Ture Whenua Māori Act 1993, the Chief Judge is directed to periodically publish information about the delivery of reserved judgments by the Court. On 17 June 2018 updated Māori Land Court Judgment Delivery guidelines were published, where the Chief Judge noted that the Court expected that 90% of the Māori Land Court’s reserved judgments would be published within 3 months of being reserved or receipt of the last submission in the case in question.

In the Māori Land Court, the delivery timeframes for reserved decisions issued in the past year were as follows:

Total Reserved Judgments Issued	Issued within 3 Months*	Issued within 6 months
66	62%	82%

In the Māori Appellate Court, the delivery timeframes for reserved decisions issued in the past year were as follows:

Total Reserved Judgments Issued	Issued within 3 Months	Issued within 6 months
5	100%	100%

** Chief Judge Fox notes that the issuing of certain judgments outside of the three-month timeframe is understandable given that there have been delays in the completion of Court transcripts and hearing minutes through Pātaka Whenua and the MOJ National Transcription Service.*

MLC judges in the Pacific Courts



Judge Coxhead with Cook Islands Land Court staff, Rarotonga

Māori Land Court Judges continue to play a vital role in the Courts of Niue and the Land Division of the High Court in the Cook Islands.

Cook Islands

The Cook Islands High Court Land Division sits for two weeks three times each year.

Judges Isaac, Coxhead, and Armstrong sat in the Cook Islands High Court Land Division during the past Matariki year in Rarotonga and Aitutaki.

With only six weeks of Land Court a year Judges have a busy schedule for their ten days of Court sitting.

Niue High Court

Since last reporting, the Niue High Court sat in Niue in November 2024 and March 2025. The current Niue High Court Judges are Deputy Chief Judge Coxhead who is the Chief Justice of Niue, Judge Reeves and Judge Armstrong. Judges sit in the High Court of Niue twice a year, normally in March and November. In between these dates the Courts are conducted by the local Niue judiciary of seven (7) Land Commissioners, four (4) Justices

of the Peace, and three (3) Civil and Criminal Commissioners.

It was a significant year for Niue in 2024, celebrating on 19 October 2024 50 years of self-governing status and free association with New Zealand. The Judges celebrated the role they have played in the past years where Māori Land Court Judges have served the people of Niue.

The Niue Government has announced plans to provide the people of Niue with a new Courthouse. Judges have had input into the concept design and assisting with the Niue Court building property principles. It is hoped that a new Court building will not be too far away and importantly there will be proper facilities to store and preserve the Land Title Records. The court records contain important historical, family, genealogical, landmark, and legal information. These are a cultural treasure and part of the heritage of the Niuean people.

Judges in the Environment Court

Judges Warren, Doogan and Williams were able to actively assist the Environment Court over the last year

Judge Doogan

Ngāti Whātua Ōrakei v Auckland City Council and Panuku Development Ltd (2025).

This case concerned contested mana whenua status in central Auckland and arose from an appeal over consent conditions for a development at Westhaven Marina. Following unsuccessful mediation, the matter went to hearing in November 2024 with judgement issued on 4 July 2025. Judge Doogan sat with alternate Environment Judge Newhook (former Chief Judge Environment Court Judge), commissioner Glynis Paine and Pukenga Dr Hiria Hape. The court found that Ngāti Whātua have demonstrated in evidence a relationship with their ancestral lands and water at Westhaven that is stronger in character than Ngāti Maru, Ngāi Tai ki Tāmaki, Te Ākitai Waiōhū, Te Patukirikiri and Ngaati Whangaunga. Final consent conditions will be set following further submissions from the parties.

Judge Williams

Connor-King v Whangarei District Council [2024] NZEnvC 351.

This was an appeal by members of Ngāti Kahu ki Torongare concerning a decision of the Commissioner in February 2024 for the Whangārei District Council who granted a consent for a subdivision and development of a 6.8ha site situated in Kamo as a residential development. Members of Ngāti Kahu o Torongare, who are mana whenua identified the area as a site of significance to tangata whenua. In 1996 the Environment Court determined that the land is of significance for Māori and the relationship that mana whenua have is clear and strong. This decision clearly stated that the land is unsuitable for subdivision. However, whilst the Commissioner accepted that the evidence clearly established that the land has considerable significance to Māori, he did not advance any substantive conditions to address this. This is despite the Resource Management Act 1995 providing that those exercising functions and

powers under the Act must recognise and provide for: (i) Section 6(e): the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga; and (ii) Section 6(f): the protection of historic heritage from inappropriate subdivision, use, and development. Evidence was provided about the alienation of the Onoke block through the Native Land Court process, and extensive evidence was provided about the use of the subject land and the surrounding area being for mahinga kai, for significant cultural practices, where wāhi tapu are located and where very tapu traditional activities for funerary purposes were practiced. It was also said that the Puriri and Totara trees are also taonga of the hapū as they were customarily used by them.

The Court found that the Commissioner's decision failed to properly consider the issues relevant to this matter, concluded that the Council breached its obligations to consult with Ngāti Kahu o Torongare in respect of the zoning changes of this area, that the land was of historic heritage, that there were sites of significance within this area that are taonga and tapu, and therefore allowed the appeal and cancelled the consent approved by the District Council. Judge Williams sat with Judge Jeff Smith and Commissioners Glennis Payne and Shona Myers.

Connor-Kingi v Whangarei District Council [2025] NZEnvC 169, 8 May 2025.

This was a costs decision that followed the earlier determination of the Court. The Northland Regional Council sought costs for legal costs and witness expenses against the developer. Full payment of costs was awarded for their expert witness and one quarter to one third for legal costs. For the Ngāti Kahu ki Torongare people the Court considered whether there was a basis for the claim of costs against the developer and the two Councils and also how that should be quantified. The Court found that there were failings made by



Westhaven Marina, Auckland: "Final consent conditions will be set following further submissions from the parties".

the developer that contributed to the hearing. In addition, members of Ngāti Kahu ki Torongare pursued the appeal to protect the land, which they do not own, in accordance with tikanga. Therefore, it is only right that some sort of award for cost should be made. The Court determined that Onoke Heights Limited is to pay a total sum of \$42,600.00 including GST to Ms Connor-Kingi and Protect Onoke Incorporated. Judge Williams sat with Judge Jeff Smith.

OJI Fibre Solutions (NZ) Limited v Waikato District Council [2025] NZEnvC 170, 28 May 2025.

This was an interim decision of the Environment Court after a 12-year process regarding appeals into the Waikato Regional Council Plan Change 1 (PC1). PC1 is the first stage in a programme to restore and protect the Waikato and Waipā river catchments by reducing contaminants which are nitrogen, phosphorus, sediment, and microbial pathogens from land use activities. PC1 is also to give effect to Te Ture Whaimana, the primary direction-setting document for the programme. The decision discusses the issues raised relating to Tangata Whenua Ancestral Land (TWAL). The Court held that the definition of TWAL to be applied should include land returned through Treaty settlement processes as well as Māori freehold land. The Waikato Regional Council was also directed to consider an alternative definition of TWAL included in the judgment, which includes General land owned by Māori. The Court also directed Waikato Regional Council to propose

amendments to Policy 17 in PC1 to recognise the River Iwi relationships with the River and also to propose a new restricted discretionary activity rule for TWAL following consultation with the parties to enable a start to be made on developing TWAL during the term of PC1.

The Court directed the Council to amend Objective 4b to read "impediments to the flexibility of the use of tangata whenua ancestral lands are minimised". Finally, in order to actively provide for a relationship as a matter of national importance, consistent with s 6(e) of the RMA, Council were encouraged to provide a real voice at the table for tangata whenua, particularly at the time that new or renewed consents are being sought for point source discharges. That was seen as being an important and culturally appropriate way to address and consider any concerns tangata whenua may have. Judge Williams sat with Chief Environment Court Judge David Kirkpatrick and Commissioner Jim Hodges and Mark Mabin.

Judge Warren

Assisted Judge Smith in preparing a costs decision in a high-profile case involving McCallum Bros, a sand mining company seeking resource consents in the Mangawhai-Pākirī region. The initial costs decision was appealed to the High Court, which ruled that Ngāti Manuhiri's invoices were required before reasonable costs could be awarded. The Environment Court had initially relied on an affidavit to assess costs. After receiving the invoices, the Court confirmed a substantial costs award in favour of Ngāti Manuhiri.

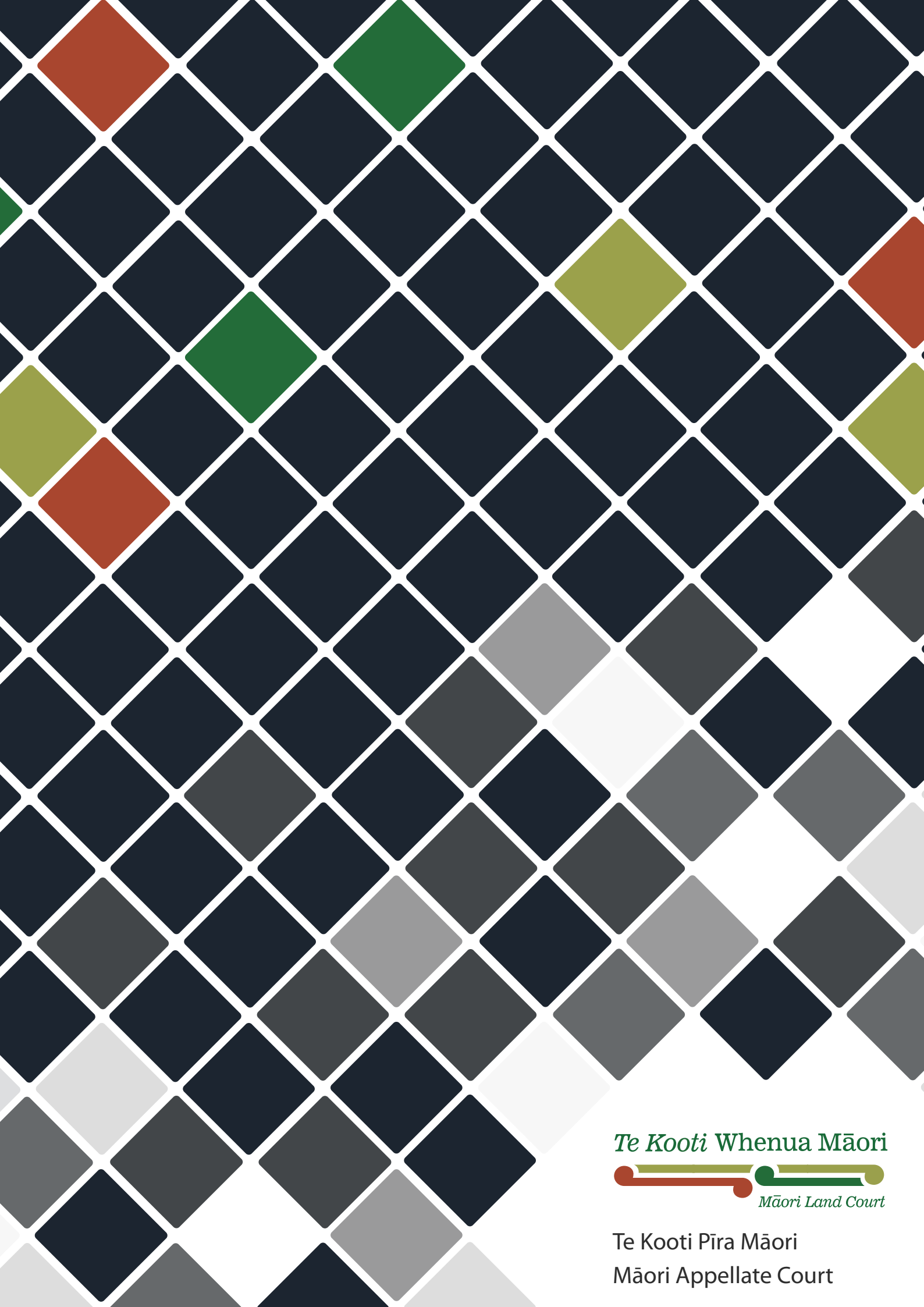
Judicial speeches and presentations

Event	Date	Judge
Māori Moots Judge, Te Rōpū Whai Pūtake (the Māori Law Students Association at Otago University) Moots - University of Otago	May 2024	DCJ Coxhead
Presentation to Reserve Bank on MLC Banking Practice	20 May 2024	Chief Judge Fox & Judge Armstrong
Presentation to Te Kura Kaiwhakawā Judicial Intensive	May 2024	DCJ Coxhead
WT Members' Conf - Kaupapa Inquiries - innovations update	10 July 2024	Judge Wainwright and Judge Stone
Waitangi Tribunal Members Conference: Tribunal remedies jurisdiction, The Mangatū appeal, Section 7AA: the summons and comity	10-11 July 2024	Judge Doogan
Māori Moot Judge 2024, Old High Court, Wellington	16 July 2024	Judge Stone
Presentation to OWLS - Ethel Benjamin	20 August 2024	Chief Judge Fox
Kōrero at Bell Gully: The Waitangi Tribunal and Māori Land Court	27 August 2024	Judge Stone
Te Tumu Paeroa - Celebrating the first 100 years of the Office of the Māori Trustee	August 2024	Chief Judge Fox
Presentation to Victoria University - Tikanga in the Courts	August 2024	Chief Judge Fox
LegalWise Seminar: Te reo Māori in the Māori Land Court	September 2024	Judge Thomas
Panelist for Lexis Nexis Webinar: Te Reo Māori and the Law	September 2024	Judge Thomas
Te Kura Kaiwhakawā Panelist for Te Wiki o te Reo Māori	September 2024	Judge Thomas
Kaiwhiriwhiri mo Ngā Manu Korero ā-Motu ki Tāmaki	September 2024	Judge Thomas
THRMOA Hui-a-Tau - "The future of the Waitangi Tribunal"	7 September 2024	Chief Judge Fox
NZLS CLE Stepping Up Course for Barrister, Sole Practitioners and Partners: Tikanga Māori and cultural competency	21 September 2024	Judge Stone
Jurisprudence Lecture - Waikato University	2 October 2024	Judge Mullins
Opening of Te Ra Tū (MLC, Tairāwhiti)	29 October 2024	Chief Judge Fox
District Visits - Presentation to staff	26 November 2024	Chief Judge Fox
Kaituku Kauwhau ki te Kura Roia ki Tāmaki	November 2024	Judge Thomas
Tompkins Wake Intern Programme - Career pathways	29 January 2025	Judge Mullins
Kaituku Kauwhau ki te Powhiri mo te Kawana Tianara ki Waitangi	February 2025	Judge Thomas
Kōrero at the opening of He Kura Toi Tangata photo exhibition at Waitangi	7 February 2025	Judge Reeves



Judge Warren with Law students at Hui-ā-Tauira, the Māori Law Students Conference, held at the Auckland University of Technology

Event	Date	Judge
Facilitator for Pacific Judicial Conference 2025	10 February 2025	DCJ Coxhead
Facilitator for Pacific Judicial Conference Regional Coordination Meeting 2025	13-14 February 2025	DCJ Coxhead
Dalhousie University (Halifax, Canada) kōrero	19 February 2025	Judge Reeves
Hamilton Bar Dinner	21 February 2025	Judge Milroy
Crown Law Presentation: Waitangi Tribunal	26 February 2025	Judge Reeves, Judge Doogan and Judge Stone
Presentation to new Waitangi Tribunal members	17 March 2025	Judge Reeves
Presentation to the Malaysian Delegates	18 March 2025	Judge Thomas
Waitangi Tribunal Research Team Away Day kōrero	26 March 2025	Judge Reeves
Family Court Associate Induction: Cultural Competence	3 April 2025	Judge Stone
Presentation to Māori ¹²³ (Victoria University class)	3 April 2025	Judge Reeves
Kaiwhiriwhiri mo Ngā Manu Korero ā-Rohe ki Te Tai Tokerau	May 2025	Judge Thomas
AMINZ - Tauranga Branch presentation on mediation and tikanga	May 2025	Judge Warren
University of Canterbury law School - Lectures & student Moot competition	7 May 2025	Judge Milroy
Leadership & Law Scholarship Presentation	9 May 2025	Judge Mullins
Guest Lecturer Waikato Law School – 15 May 2025	15 May 2025	DCJ Coxhead
Waitangi Tribunal 50th Anniversary Speaker Panel, Te Papa Tongarewa	22 May 2025	Judge Wainwright, Judge Mullins and Judge Armstrong
Interview for Te Karere re Karanga Rā release	27 May 2025	Judge Thomas
Presentation to Community Law Service - common applications Pt 1	29 May 2025	Chief Judge Fox
Presentation to Community Law Service - common applications Pt 2	5 June 2025	Chief Judge Fox
Presentation to Community Law Service - Title applications	11 June 2025	Chief Judge Fox
NZLS Trust Law Conference	June 2025	Judge Warren
National Kaupapa Māori Moot Final	8 July 2025	Judge Armstrong
Waitangi Tribunal members conference: overview of coalition agreements urgencies	10-11 July 2025	Judge Reeves
Waitangi Tribunal Inquiry Facilitation Away Day kōrero	11 July 2025	Judge Reeves



Te Kooti Whenua Māori



Māori Land Court

Te Kooti Pira Māori
Māori Appellate Court