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Tēnā koe

LEGAL ADVICE ON IMMIGRATION POLICY AND TE TIRITI O WAITANGI

HE KUPU ARATAKI - INTRODUCTION

1. You have requested legal advice in relation to the New Zealand Productivity Commission's (the '**Commission**') inquiry into immigration policy.

2. In particular, you have sought advice on the terms of reference as to how:

   (a) they relate to concepts within te ao Māori;

   (b) they can assist in thinking about immigration policy; and

   (c) the Crown can honour Te Tiriti o Waitangi and mana Māori in development and applying immigration policy to ensure it reflects the interests and aspirations of tāngata whenua as whānau, hapū and iwi.[1]

3. You have requested our advice consider:

[1] See terms of reference, page 4.

(a) statutes, case law and other relevant materials about the Crown's obligation to consult with Māori in developing and implementing immigration policy; and

(b) what frameworks or standards would be useful to assess the Treaty interest in immigration policy.

4. We understand that you are developing a public consultation process on the Commission's inquiry. As part of that inquiry, you seek some practical suggestions as to how to engage Māori meaningfully.

5. Our advice on these matters is below, and is set out in accordance with our agreed proposal of 23 July 2021.

HE WHAKARĀPOPOTOTANGA – SUMMARY OF ADVICE

6. The duty to consult Māori is wide-ranging, and stems from the principles of partnership, good faith and active protection of Māori interests. The obligation to consult is not limited to taonga under Article 2 of Te Tiriti (such as natural resources or land). Consultation may be required where the Crown is formulating general policy (such as immigration policy) that may engage Treaty principles or affect Māori interests, including the exercise of rangatiratanga.

7. The extent of consultation required by the Crown depends on the situation at hand, and assessing how Māori interests might be affected. In general, the courts and the Waitangi Tribunal have recognized consultation might require a range of types of engagement, from merely providing information to Māori, to seeking informed consent of Māori, and in certain narrow situations even devolution of Crown authority. In general, the greater the impact on Te Tiriti and Māori interests, the greater the degree of consultation required.

8. Although the Immigration Act 2009 (**the Immigration Act**) does not explicitly refer to Te Tiriti or tikanga, we are of the view that there is a strong Treaty based interest in immigration policy, given that the Treaty was predicated on facilitating settlement of Aotearoa but preserving rangatiratanga. The broad language of certain provisions in the Act might import consideration of Te Tiriti and tikanga considerations, and may require a high level of consultation and engagement with Māori.

9. There are a number of decisions that are made based on immigration policy, where Te Tiriti (including the Article 2 reference to rangatiratanga and the principle of consultation) and tikanga (such as mana, whanaungatanga and manaakitanga) ought to be considered and applied, such as decisions to grant visas or entry permissions, deport persons and other decisions. Furthermore, for the Crown to act consistently with Te Tiriti, it ought to

consider incorporating Te Tiriti and tikanga in the development of immigration policy, and empowering Māori to exercise manaakitanga to migrant communities.

PART 1 – TE TIRITI AND THE DUTY TO CONSULT

Introductory comments

10. Irrespective of whether the Crown has a duty in law to consult with Māori on a specific policy proposal, at a practical level, Ministries and Crown departments as a matter of routine generally develop engagement strategies with Māori when formulating and implementing policy initiatives.

11. The Office of Crown Māori Relations - Te Arawhiti has developed an engagement framework and engagement guidelines for the public sector.[2] The framework recognises that engagement with Māori is "an acknowledgement of their rangatiratanga and status as Treaty partners".

12. The Te Arawhiti framework provides a spectrum of levels of engagement with Māori, from informing, consulting, collaborating, partnering to empowering. It also provides a template engagement strategy, which may be of useful to the Commission, in addition to the legal analysis set out below. We also note that "consultation" is at the lower end of the spectrum, and on matters of general significance to Māori, there is increasingly an expectation of partnership and shared decision-making. We annex separately the engagement guidelines to this paper.

Treaty principles and the duty to consult

13. In general, the Crown's duty to consult with Māori stems from the core principles of Te Tiriti o Waitangi and related duties. These include:[3]

    (a) the duty of partnership;

    (b) the duty to act reasonably, honestly and in good faith; and

    (c) the duty of active protection.

14. Although consultation is not an absolute legal duty that must be applied in all circumstances,[4] the Crown's duty of partnership, good faith, and active protection will often require the Crown to consult with Māori.

15. Factors relevant to determining whether the Crown must consult (and to what degree) include:

[2] Available at Te Arawhiti - Engagement.
[3] These are the core principles found in *New Zealand Maori Council v Attorney-General* [1987] 1 NZLR 641 (CA) *[SOE case]*.
[4] SOE case, at 665 and 683.

(a) Whether there is an express statutory obligation to consult, or a Treaty reference in the statute that imports a duty to consult.[5]

(b) Whether a Crown policy impacts upon a taonga[6] protected under article 2 of Te Tiriti, which would imply an obligation to consult (such as the management of natural resources, wai Māori, whenua Māori etc) whether or not there is an express statutory reference.

(c) Whether Tiriti principles or other Māori rights and interests are affected by Crown policy, such that the Crown ought to consult with Māori. This includes impacts on the exercise by Māori of rangatiratanga in their rohe. [7]

16. The duty to consult is connected to the duty of the Crown to make informed decisions. The courts and the Waitangi Tribunal have recognised that to fulfil its duty to act reasonably and in good faith, the Crown is obliged to be sufficiently informed as to relevant facts and law so that there is proper assessment of the impact on the Treaty and Māori when developing and implementing policy.[8]

17. Furthermore, Waitangi Tribunal reports have described the Crown's duties as being fiduciary in nature,[9] and as an exchange of kāwanatanga for the protection of Māori rangatiratanga.[10] This concept of exchange encompasses a duty to consult on policy matters that affect Māori interests.[11]

Examples involving consultation

[5] Section 8 of the Resource Management Act 1991, which requires "all persons exercising functions and powers under the RMA to "take into account the principles of the Treaty of Waitangi" has been interpreted to require consultation with Māori. See for example *Land Air Water Association v Waikato Regional Council*, ENC Auckland A110/01, 23 October 2001. Similarly, there are express references in the RMA that require consultation by local authorities, such as s 34A(1A).
[6] Waitangi Tribunal *Ko Aotearoa Tēnei: A Report into Claims Concerning New Zealand Law and Policy Affecting Maori Culture and Identity, Te Taumata Tuatahi* (Wai 262, 2011). 'Taonga' was described in *Ko Aotearoa Tēnei* as "anyting that is treasured", and "includes tangible things such as land, waters, plants, wildlife and cultural works; and intangible things such as language, identity and culture, including mātauranga Māori itself" at [17].
[7] See, for example, Waitangi Tribunal *Ngawha Geothermal Resource Report 1993* (Wai 304, 1993) at 137: "…the Treaty guarantee of rangatiratanga requires a high priority for Māori interests when proposed works may impact on Māori taonga."
[8] *New Zealand Maori Council v Attorney-General* [1987] 1 NZLR 641 (CA) [*SOE case*] at 665 and 683.
[9] Waitangi Tribunal *The Turangi Township Report 1995* (Wai 84, 1995) at 289; Waitangi Tribunal *Te Maunga Railways Land Report* (Wai 315, 1996) at 80.
[10] Waitangi Tribunal *The Ngai Tahu Report 1991* (Wai 27, 1991) at 236.
[11] Waitangi Tribunal *The Ngai Tahu Sea Fisheries Report 1992* (Wai 27, 1992) at 270; Waitangi Tribunal *Ngawha Geothermal Resource Report 1993* (Wai 304, 1993) at 99-102; Waitangi Tribunal *The Turangi Township Report,* at 284-288.

18. The duty to consult is wide ranging. It is not limited only to policies that impact on or connected directly to taonga (such as land), but can include matters of general public policies that impact Māori interests. For example, negotiation of the Trans-Pacific Partnership Agreement[12] or policy for the uplift of children in State care.[13] Some examples where the courts and the Waitangi Tribunal have found the Crown owed a duty to consult include:

    (a) The transfer of forestry rights under the Crown Forest Assets Act 1989, even where the underlying land itself was not to be transferred. A duty to consult was owed on the basis of the importance of Māori interests in the underlying forestry land.[14] The Court of Appeal reiterated the concept of partnership, stating that the good faith owed to each other by the parties to the Treaty "must extend to consultation on truly major issues".[15]

    (b) The issue of permits by the Director-General of Conservation under the Marine Mammals Protection Act 1978, for sperm whale watching in Kaikoura.[16] The Court of Appeal found that although whale watching was not a taonga, statutory provisions for giving effect to the principles of the Treaty should not be interpreted narrowly.[17] Whale watching was "so linked to taonga and fisheries" that Treaty principles were relevant. As such, the Crown was required to do more than merely consult, but to specifically take into account Ngai Tahu Treaty interests in deciding to issue permits.

    (c) In relation to negotiating international agreements such as the Trans-Pacific Partnership Agreement ('**TPPA**'), where the Crown in the Waitangi Tribunal's TPPA Report, was found not to have adequately consulted with Māori and identified Māori interests. The Tribunal found that the Crown's consultation process had treated Māori as stakeholders rather than Treaty partners.[18]

19. This list above is not comprehensive. Whether consultation is required will

[12] See Waitangi Tribunal *Report on the Trans-Pacific Partnership Agreement* (Wai 2522, 2016) [*Trans-Pacific Partnership Report*].
[13] See Waitangi Tribunal *He Pā Harakeke, He Rito Whakakīkinga Whāwhārua – Oranga Tamariki Urgent Inquiry* (Wai 2915, 2021). Although the duty to consult was not determined per se, the obligation of partnership required the Crown to involve Māori in designing and implementing policy that affects tamariki and whānau. The Tribunal found at [2.5] that "there is little evidence of Tiriti/Treaty partnership in the design or implementation of Crown policy and legislation" and at [2.5] that "...partnership in this context will require the Crown to be versatile and receptive to the different needs of various Māori communities...we also believe partnership in this instance will mean allowing Māori to take the lead on the transformation itself".
[14] *New Zealand Maori Council v Attorney-General* [1989] 2 NZLR 142 (CA) [*Forestry Assets*] at 143.
[15] Forestry Assets, at 152.
[16] *Ngai Tahu Maori Trust Board v Director-General of Conservation* [1995] 3 NZLR 553 (CA) [*Ngai Tahu*].
[17] Ngai Tahu, at 558.
[18] *Trans-Pacific Partnership Report*, above n 12, at 558.

depend heavily on the fact situation at hand and the consideration of Te Tiriti in that context.

Determining the extent of consultation required

20. The extent of consultation the Crown is required to undertake depends on what is reasonable in the circumstances. As the Waitangi Tribunal stated in Wai 1200 (the Report on Central North Island Claims):[19]

> The test of what consultation is reasonable in the prevailing circumstances depends on the nature of the resource or taonga, and the likely effects of the policy, action, or legislation. In some circumstances, a lack of consultation with iwi and hapu over their interests will mean that the Crown cannot make an informed decision. In other cases, it can make an informed decision without consultation.

21. The degree of consultation required will be different depending on the on how central the Treaty interest is to the policy. As the Waitangi Tribunal stated in *Ko Aotearoa Tēnei* (Wai 262):[20]

> There can be no "one size fits all" approach. Rather, the Treaty standard for Crown engagement with Maori operates along a sliding scale. Sometimes, it may be sufficient to inform or seek opinion … But there will also be occasions in which the Maori Treaty interest is so central and compelling that engagement should go beyond consultation to negotiation aimed at achieving consensus, acquiescence or consent.

22. In general, the greater the impact on Te Tiriti, the principles, or matters important to Māori,[21] the greater the degree of consultation required.[22]

23. The Tribunal in the Trans-Pacific Partnership Report (Wai 2522), relying on the approach to consultation adopted in *Ko Aotearoa Tēnei*, set out a sliding scale with levels of consultation and engagement required with Māori, as follows:[23]

    (a) Where the Māori interest is limited, very little engagement will be required, other than perhaps the provision of information.

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[19] Waitangi Tribunal *He Maunga Rongo:Report on Central North Island Claims* (Wai 1200, 2008) at 1237.

[20] Waitangi Tribunal *Ko Aotearoa Tēnei: A Report into Claims Concerning New Zealand Law and Policy Affecting Maori Culture and Identity, Te Taumata Tuatahi* (Wai 262, 2011) at 237.

[21] *Trans-Pacific Partnership Report*, above n 12, at [1.7]: "Included in the principle of partnership is the Crown's duty to consult with Māori. Tribunals have previously found that the Crown must consult with Māori on matters of importance to them, though this is not an open-ended requirement."

[22] See *SOE Case*, above n 8, at 683, where Richardson J found that "In many cases where it seems there may be Treaty implications that responsibility to make informed decisions will require some consultation. In some cases extensive consultation and co-operation will be necessary."

[23] As set out in the *Trans-Pacific Partnership Report,* above n 12, at [1.8].

(b) When Māori interests are at play but wider interests are to the fore, a very general level of engagement is justified. Sometimes the Māori interests will be a specialised one, which would warrant consultation with certain groups, such as informing and seeking the views of the Federation of Māori Authorities (FOMA), who tend to speak on behalf of Māori business interests.

(c) When Māori interests are significantly affected, intensive consultation and discussion is required.

(d) On some occasions, Māori Treaty interests will be so central and compelling that engagement should go beyond consultation to negotiation aimed at achieving consensus…There may even be times where the Māori interest is so overwhelming, and other interests so limited, that the Crown should contemplate delegation of its decision-making powers.

24. Importantly, the Crown cannot simply point to interests that Māori have in common with other New Zealanders in order to restrict or narrow its duty to consult.[24] It must specifically turn its mind to the Treaty interest and impacts upon Māori when developing policy.

25. In relation to immigration, the level of consultation required will depend on the specific policy being proposed. But in general, and for the reasons we set out in Part 2 below, we consider that Māori interests would be significantly affected, and so a high degree of consultation would be required.

PART 2 – TE TIRITI AND IMMIGRATION POLICY

The statutory framework

26. In this context, following consideration of Te Tiriti and tikanga more generally, the next logical reference is the statutory framework.

27. We note there is no Treaty clause in the Immigration Act, nor any reference to tikanga Māori. However, that does not mean Tiriti or tikanga obligations are irrelevant or do not apply at law. The statute is only one reference point.

28. For example, as recently observed by Williams J in *Stafford v Accident Compensation*:[25]

[24] See *Trans Pacific Partnership* Report, above n 12, at [5.2.2].

[25] [2020] NZCA 164 at [341] (acknowledging his Honour's judgment was the Minority judgment) citing *Huakina Development Trust v Waikato Valley Authority* [1987] 2 NZLR 188 (HC); *Barton-Prescott v Director-General of Social Welfare* [1997] 3 NZLR 179 (HC); and *New Zealand Maori Council v Attorney-General* [2007] NZCA 269, [2008] 1 NZLR 318.

> Though the Treaty of Waitangi is not recognised as higher law in the same sense in New Zealand, it is nonetheless an important and potentially powerful aid to interpretation even where not expressly incorporated into the relevant statute.

29. His Honour Williams J relied on *Huakina Development Trust v Waikato Valley Authority* (*Huakina*),[26] and cases following, in making that statement. In *Huakina*, Māori values and the Treaty of Waitangi were relevant considerations in granting a right to discharge waste-water, despite the absence of any such references in the Water and Soil Conservation Act 1967. Chilwell J in *Huakina* found that the Treaty is now widely considered "part of the fabric of New Zealand society"[27], and as a result, it can be read into statutes that do not have express statutory reference to Te Tiriti. This has been adopted as a general approach following Huakina.[28]

30. More recently, courts have found that "rights and interests according to tikanga may be legal rights recognised by the common law"[29] and that tikanga "values" form part of the common law.[30] The Court of Appeal has recently held that in determining "existing interests" for the purposes of the EEZ Act, that tikanga Māori is part of the "applicable law" of New Zealand:[31]

> We consider that it is (or should be) axiomatic that the tikanga Māori that defines and governs the interests of tangata whenua in the taonga protected by the Treaty is an integral strand of the common law of New Zealand.

31. The purpose of the Immigration Act in s 3(1) is to "manage immigration in a way that balances the *national interest*, as *determined by the Crown*" [emphasis added]. Developing policy for the "national interest" must in our view include consideration of impacts upon Māori, Te Tiriti o Waitangi and tikanga-related considerations. We set these out in more detail below.

32. Furthermore, these considerations may color similarly broadly framed provisions in the Act, such as section 13(1), which confirms that "every New Zealander has, by virtue of his or her citizenship, the right to enter and be in New Zealand at any time". Treaty and tikanga considerations might also be relevant where the decision-maker exercises statutory discretion. For example, the "absolute discretion" of the decision-maker in

[26] *Huakina Development Trust v Waikato Valley Authority* [1987] 2 NZLR 188.
[27] Huakina at 210.
[28] See also *Barton-Prescott v Director-General of Social Welfare* [1997] 3 NZLR 179 (HC); and *New Zealand Maori Council v Attorney-General* [2007] NZCA 269, [2008] 1 NZLR 318; *Trans-Tasman Resources Limited v Taranaki-Whanganui Conservation Board* NZCA 86.
[29] *Ngāti Whātua Ōrākei Trust v Attorney General* [2018] NZSC 84, [2019] 1 NZLR 116 at [77].
[30] *Takamore v Clarke* [2012] NZSC 116 (CJ at [94], others at [164]).
[31] *Trans-Tasman Resources Limited v Taranaki-Whanganui Conservation Board* NZCA 86, at [177].

deciding to grant visas or entry permissions under section 17(3) or section 61(2).

The Treaty interest in immigration

33. In our view there is a strong Treaty-based interest in immigration given Te Tiriti was intended to protect Māori interests (including rangatiratanga) in the face of rapidly increasing immigration and settlement of Aotearoa. This is reflected in the English version of the Preamble, which provides that a Treaty was:

> …*necessary in consequence of the great number of Her Majesty's Subjects* who have already settled in New Zealand *and the rapid extension of Emigration both from Europe and Australia which is still in progress* to constitute and appoint a functionary properly authorized to treat with the Aborigines of New Zealand for the recognition of Her Majesty's Sovereign authority over the whole or any part of those islands.

34. The Māori version of the Preamble similarly refers to the transfer of kāwanatanga to the Crown to protect Māori interests:[32]

> …ka wakarite ki nga Tangata maori o Nu Tirani – kia wakaaetia e nga Rangatira Maori te Kawanatanga o te Kuini ki nga wahikatoa o te wenua nei me nga motu – *na te mea hoki he tokomaha nga tangata o tona Iwi Kua noho ki tenei wenua, a e haere mai nei.*

35. There is therefore an underlying Treaty interest in immigration based on the protection of rangatiratanga. The nature of that interest, and the extent of the Crown's duty to consult, will depend on the specific policy being introduced.

36. Furthermore, specific policies or decisions made in relation to immigration might impact upon Māori or provide an opportunity to protect or promote a taonga, such as te reo Māori or tikanga. For example:

(a) **Policy settings for permanent and temporary migrants**

(i) Decisions to grant visa and entry permissions under the Permanent Migrants Scheme. You have advised that applications are considered by awarding points based on skills, qualifications, age and experience of applicants. The criteria includes English language proficiency, with some visa conditions requiring ongoing education.[33]

[32] This has been translated by Professor Sir Hugh Kawharu as follows: "...their chiefs will agree to the Queen's Government being established over all parts of this land and (adjoining) islands (4) and also because there are many of her subjects alrea dy living on this land and others yet to come." See Translation of the te reo Māori text | Waitangi Tribunal.

[33] See Learning English In New Zealand | New Zealand Now.

(ii) To act consistently with Te Tiriti, the Crown might grant favourable consideration to applicants who demonstrate an understanding of, or willingness to learn, Māori language.

(iii) An alternative, stronger obligation, would be if the Crown placed conditions on visa or permits under s 14(1)(a)(i) of the Immigration Act, to attend a basic Māori language course. This would arguably be consistent, for example, with the finding that te reo Māori is a taonga "of transcendental importance".[34] This would likely require the Crown to support migrants to learn basic Māori language.

(iv) Similarly, weight could be given to applicants who demonstrate an understanding or willingness to learn about tikanga Māori, te ao Māori or the history of colonization of Aotearoa and its impacts upon Māori.

(v) These weightings could also apply to temporary migrants (such as those that apply for working holiday scheme visas etc).

(vi) We note there are two extant Waitangi Tribunal claims that allege the Crown has breached the Treaty in failing to grant a residency application to a Māori claimant's overseas husband (Wai 2369),[35] and declining a work visa application from a Māori claimant's husband (Wai 2370).[36] The claims are based on the alleged failure by the Crown to recognize their spouses as taonga.

(b) **Decisions on whether to deport persons**

(i) There may be tikanga-based considerations, such as mana and whanaungatanga, that are relevant to consider when deciding whether to deport individuals who are connected to whānau Māori.

(ii) There are currently three extant Waitangi Tribunal claims from Māori claimants whose spouses from overseas were liable for deportation (Wai 2369, Wai 1428 and Wai 2420).[37] The arguments advanced include that the Crown has breached Te Tiriti by failing to recognize claimants' spouses are taonga, and a failure to consider tikanga Māori.

[34] *Ko Aotearoa Tēnei*, above n 20, at [5.5.1].
[35] Wai 2369 – The Immigration Issues (Ashby) Claim.
[36] Wai 2370 – The Immigration Issues (Taukamo) Claim.

[37] Wai 2865 – The Immigration Policy (Tūpara) Claim, Wai 1428 – The New Zealand Immigration Service (Hauiti) Claim and Wai 2420 – The Immigration Issues (Edwards-Paul) Claim.

(iii) These claims have not been heard or reported on by the Waitangi Tribunal, except an application for urgency in respect of Wai 1428 which was declined.

(c) **Incorporating tikanga and empowering Māori**

(i) There are clearly applicable tikanga that apply to immigration according to a Māori worldview. This includes manaakitanga, which refers to the obligation to provide care and hospitality to manuhiri (guests).

(ii) To act consistently with Te Tiriti, the Crown would consider providing resources available for Māori to build relationships between migrant communities and mana whenua. This would place Māori in the position of being able to support and manaaki migrants as manuhiri into Aotearoa.

(iii) The resourcing could be for developing programmes to be delivered by mana whenua to support migrants. This would be consistent with the focus on positively integrating migrants into society.

(d) **Disproportionate impact of migration**

(i) In our view, the Crown as part of its Treaty obligations, ought to consider, and regularly monitor and assess the impact of migration on Māori communities and wellbeing.

(ii) Migration (particularly migration in large numbers over a short period of time) inevitably creates pressure on internal infrastructure, such as housing. That pressure could disproportionately impact upon Māori, at least in the short term until the broader economic benefits that flow from migration are realized. This may cause claims to be advanced in the Waitangi Tribunal about disproportionate impacts on Māori in access to health and housing being exacerbated by immigration policy or settings.

(iii) Conversely, the Crown should consider whether any of the economic benefits that flow from increased migration make a positive impact on Māori communities, given the history of colonisation and its impact on Māori in Aotearoa.[38]

(e) **The placement of certain migrants**

[38] See Tahu Kukutai and Arama Rata "From Mainstream to Manaaki: Indigenising our Approach to Immigration" in D. Hall *Fair Borders? Migration Policy in the Twenty-First Century* (Wellington, 2017) at 26–44).

(i) Māori may have an interest in where certain migrants, such as refugees, are placed once they are granted permanent entry.

(ii) Māori consultation in decisions on the placement of migrants may be relevant to enable Māori to exercise kaitiakitanga and mana whenua, for example. It could also ensure a greater degree of support and integration of migrants within the community.

PART 3 – PRACTICAL SUGGESTIONS FOR ENGAGING WITH MĀORI

37. In accordance with our advice above, we consider Te Tiriti requires a strong form of consultation and engagement with Māori. In our experience, consultation will only be fruitful if it addresses up front Māori expectations about the nature of engagement with them. The Crown and Māori might not necessarily agree about the ultimate outcomes, but open discussion between Māori and the Crown will be beneficial.

38. In that regard, and in addition to the matters raised in the Issues Paper and Terms of Reference, appropriate consultation in our view would be supported by considering:

(a) incorporating specific tikanga-based considerations, such as manaakitanga, kaitiakitanga and rangatiratanga. This would meet Māori expectations around having a meaningful role in decision-making, where appropriate;

(b) whether a reference group established in partnership with Māori and comprised on Māori and Crown representatives would be useful in framing consultation, planning and delivery. This could support the Commission's capacity to engage Māori long-term;

(c) current relationships with pan-Māori groups, for example the Federation of Māori Authorities or other Māori organisations, to build stronger partnerships with broad collective Māori interests.

(d) Commissioning the development of a Tiriti / tikanga immigration matrix that assist's the Crown to aess the level of engagement with Māori required in specific situations. This could be developed and led by the reference group referred to above.

39. We would be happy to discuss this advice in more detail if you wish.

I roto i ngā mihi,

Tai Ahu
Consultant
WHĀIA LEGAL

APPENDIX 1
Te Arawhiti Engagement Guidelines