KEI MUA I TE AROARO O TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI

BEFORE THE WAITANGI TRIBUNAL **WAI 3325**

IN THE MATTER OF	**the Treaty of Waitangi Act 1975**
AND	
IN THE MATTER OF	**the Climate Change Priority Inquiry**

MEMORANDUM OF COUNSEL FOR THE CROWN

29 Ākuhata | August 2025

Te Tari Ture o te Karauna
Crown Law

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Waitangi Tribunal
1 Sep 25
Ministry of Justice
WELLINGTON

MAY IT PLEASE THE TRIBUNAL:

Introduction

1. In memorandum directions dated 18 August 2025, the Tribunal granted the Crown an extension to file its evidence by 29 August 2025.

2. Counsel now files the following briefs of evidence:

    2.1 Hemi Smiler (mitigation).

    2.2 Katherine Wilson (adaptation).

    2.3 Bryan Smith and Simon Mandal-Johnson (ETS).

    2.4 Dan Bolger (fisheries policy).

    2.5 Richard Ford (fisheries science).

    2.6 Victoria Hallum (MFAT).

    2.7 Paula Rawiri (TPK).

    2.8 Paul Barker (DIA).

    2.9 William John Martin (MBIE research).

    2.10 Andrew Old (Health).

    2.11 Jenna Rogers and Dwain Hindriksen (NEMA).

    2.12 Katrina Casey (CRU).

    2.13 Siobhan Routledge (Transport).

    2.14 Helen Plume (Expert).

    2.15 Kay Harrison (Expert).

    2.16 Sam Dean (Expert).

3. Despite counsel's best efforts, a number of briefs have not yet been finalised, and counsel will be unable to file them today. These remaining briefs are very close to final and will be filed as soon as possible, likely in the week beginning 1 September 2025. Counsel apologise for the delay in filing and seek leave for the same.

4. Counsel will also file updated versions of all briefs, as this will include document identifiers and documents as soon as possible but also likely next week.

5. The Crown notes the Climate Change (Te Taumata) (Wai 3287) claimants have signalled they will file an expert brief of evidence from Dr Richard Meade (or other economic evidence). The Crown had prepared a draft brief of evidence on economic matters, but it would be premature to finalise it without first having the benefit of receiving and responding to Dr Meade's evidence. If the claimants confirm they will be commissioning Dr Meade's evidence, the Crown will file evidence from its expert after receipt of Dr Meade's evidence. If, however, the claimants confirm they will not be commissioning Dr Meade's evidence, then the Crown will proceed with filing its evidence.

29 Ākuhata | August 2025

J Prebble / N Fong / A McTaggart
Counsel for the Crown

TO: The Registrar, Waitangi Tribunal

AND TO: Claimant Counsel