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

19 September 2025

Te Tari Ture o te Karauna
Crown Law

Pouaka Poutāpeta
Te Whanganui-a-Tara
Waea

PO Box 2858
Wellington 6140
Tel: 04 472 1719

Whakapā mai: **Contacts:**

Nixon Fong / Grace Seeley
nixon.fong@crownlaw.govt.nz / grace.seeley@crownlaw.govt.nz

Barrister instructed:

Jeremy Prebble
jeremy.prebble@hawkestone.co.nz

RECEIVED
Waitangi Tribunal
19 Sep 25
Ministry of Justice
WELLINGTON

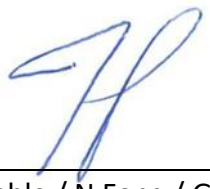
MAY IT PLEASE THE TRIBUNAL:

1. In memorandum-directions dated 16 September 2025, the Tribunal directed Crown Counsel to file the Crown's briefs of evidence (with document identifiers) and its expert evidence relating to economics by 23 September 2025.

2. Counsel are working actively on this direction. However, half of the Crown's team is currently occupied in another Tribunal hearing this week, which means it is difficult to progress with the direction as expeditiously as desired. Accordingly, counsel are unlikely to be in a position to comply with the direction by 23 September 2025. However, counsel will be able to do so by 30 September 2025. A short extension to this effect is sought accordingly.

3. Counsel apprehends this short extension will not cause prejudice to the claimants given they propose to file their reply evidence in December and for reply evidence to be heard in March next year (albeit subject to the Tribunal's confirmation).

19 September 2025



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

TO: The Registrar, Waitangi Tribunal

AND TO: Claimant Counsel