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

BEFORE THE WAITANGI TRIBUNAL

WAI 3300

IN THE MATTER OF

the Treaty of Waitangi Act 1975

AND

IN THE MATTER OF

Tomokia ngā tatau o Mātangireia – the
constitutional kaupapa inquiry

MEMORANDUM OF THE CROWN FILING CROWN STATEMENT OF POSITION
11 December 2025



**Te Tari Ture
o te Karauna**
Crown Law

Pouaka Poutāpeta PO Box 2858
Te Whanganui-a-Tara Wellington 6140
Waea Tel: 04 472 1719

Whakapā mai: Contacts:

Rahera Douglas / Lachlan Ewing
Rahera.Douglas@crownlaw.govt.nz / Lachlan.Ewing@crownlaw.govt.nz

RECEIVED

Waitangi Tribunal

11 Dec 25

Ministry of Justice
WELLINGTON

Barrister Acting:

Andrew Irwin
Andrew.Irwin@cliftonchambers.co.nz

MAY IT PLEASE THE TRIBUNAL:

1. As directed by the Tribunal,¹ the Crown files with this memorandum its statement of position following the wānanga ā-rohe.
2. This statement of position follows the Crown's initial statement of position and the addendum to that document.²
3. Through this statement the Crown sets out its position on the issues identified by the Tribunal and commented on by claimants during the six wānanga ā-rohe. The Crown hopes this document will assist the Tribunal in planning ahead for this inquiry.
4. This statement of position does not replace the Crown's earlier statement and addendum. The purpose of this statement is to provide a detailed statement of constitutional principles already identified by the Crown in relation to issues framed by the Tribunal and comments made by claimants.

11 December 2025



A K Irwin / R K Douglas / L C Y Ewing
Counsel for the Crown

TO: The Registrar, Waitangi Tribunal

AND TO: Claimant counsel

¹ Wai 3300, #2.6.73 at [11].

² See Wai 3300, #B14(a) and #B14(b).