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

BEFORE THE WAITANGI TRIBUNAL

WAI 2358

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IN THE MATTER OF

the Treaty of Waitangi Act 1975

AND

IN THE MATTER OF

the National Fresh Water and Geothermal  
Resources Inquiry

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MEMORANDUM OF COUNSEL FOR THE CROWN

31 Oketopa | October 2025

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

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RECEIVED

Waitangi Tribunal

31 Oct 25

Ministry of Justice  
WELLINGTON

**MAY IT PLEASE THE TRIBUNAL:**

1. In this memorandum, the Crown provides an update on claimant funding for the discrete one-day hearing on 7 November 2025.
2. Claimant funding is available for the online hearing. As the Ministry for the Environment (MfE) does not have a specific remote hearing policy, the preparatory hui guidelines outlined at pages six and seven of the claimant funding policy for Wai 2358 will be adopted. The guidelines can be found [here](#).<sup>1</sup>
3. MfE can fund venue hire, Audio-Visual Link (AVL) equipment hire, and catering for claimants and claimant witnesses who wish to attend the hearing via AVL. If multiple claimants in the same area wish to arrange venue hire, they are encouraged to share a venue. MfE can also reimburse claimants and claimant witnesses for travel to and from a local venue or lawyer's office for remote attendance.
4. Claimants who wish to request such funding are encouraged to contact MfE in advance of the hearings, however MfE can provide reimbursements if necessary.
5. Applications for, or enquiries about, claimant funding should be directed to [claimantfunding@mfe.govt.nz](mailto:claimantfunding@mfe.govt.nz).

31 Oketopa | October 2025



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T Stephens KC / G Seeley / A McTaggart  
Counsel for the Crown

**TO:** The Registrar, Waitangi Tribunal

**AND TO:** Claimant Counsel

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<sup>1</sup> Ministry for the Environment *Claimant funding policy: Waitangi Tribunal National Freshwater and Geothermal Resources Inquiry (Wai 2358) Stage 3* (March 2024) at 6-7 <[Claimant-funding-policy-stage-3-Wai-2358.pdf](#)>.