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 TALKING POINTS

12 February 2026

Te Tari Ture o te Karauna
Crown Law

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Waitangi Tribunal
12 Feb 26
Ministry of Justice
WELLINGTON

MAY IT PLEASE THE TRIBUNAL:

1. This memorandum is filed in advance of the presentation of the Crown statement of position on Friday 13 February 2026.

2. Andrew Kibblewhite, the Secretary for Justice, will lead the presentation for the Crown. Mr Kibblewhite will be supported by Caroline Greaney, Deputy Secretary, Policy and Tony Fisher, Pou Whirinaki at the Ministry of Justice, and Andrew Irwin, counsel for the Crown.

3. The Crown presentation will include:

   3.1 introduction of Crown attendees;

   3.2 opening remarks;

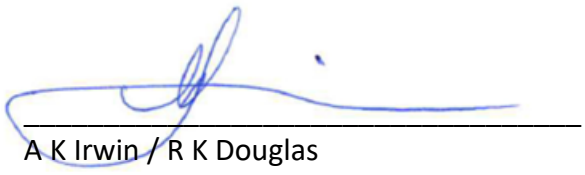
   3.3 presentation of the statement of position filed on 11 December 2025;[1] and

   3.4 some final comments.

4. To support this approach, talking points for the presentation is **appended** for filing.

5. The Crown expects the presentation to take no more than an hour, with Tribunal questions to follow.

12 February 2026



A K Irwin / R K Douglas
Counsel for the Crown

TO: The Registrar, Waitangi Tribunal

AND TO: Claimant counsel

[1] Wai 3300, #B14(c).