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

BEFORE THE WAITANGI TRIBUNAL

WAI 682

IN THE MATTER OF

the Treaty of Waitangi Act 1975

AND

IN THE MATTER OF

an application for an urgent inquiry by the
Ngāti Hine Lands, Forests and Resources
claim

MEMORANDUM OF THE CROWN ON LEGISLATIVE TIMEFRAMES

24 April 2026



**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:

Daniel Hunt / Rahera Douglas

Daniel.Hunt@crownlaw.govt.nz / Rahera.Douglas@crownlaw.govt.nz

Barrister instructed:

Gregor Allan

gregor@portnic.co.nz

RECEIVED

Waitangi Tribunal

24 Apr 26

Ministry of Justice
WELLINGTON

MAY IT PLEASE THE TRIBUNAL:

1. The Tribunal has directed the Crown to file its response to the Wai 682 application for an urgent inquiry by midday on 28 April 2026.¹ This followed Wai 682 counsels' request for a more expedited timeframe for the Crown's response, based on the claimants' concern about the potential imminence of legislation following Cabinet's decisions regarding statutory references to the Treaty of Waitangi.²
2. Counsel are instructed that, on current timeframes, proposed legislation would not be introduced to the House of Representatives before early-August 2026. This update is also being provided to the Tribunal in the Wai 3553 and Wai 3325 inquiries today.
3. In light of this timeframe, counsel respectfully request an extension to file the Crown's response to the application for an urgent inquiry by **5pm, Friday 1 May 2026.**

24 April 2026



G Allan / D Hunt / R Douglas
Counsel for the Crown

TO: The Registrar, Waitangi Tribunal

AND TO: Claimant Counsel

¹ Direction of the Deputy Chairperson circulated by email of the registry, dated 22 April 2026.

² Wai 682, #2.117.