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

BEFORE THE WAITANGI TRIBUNAL

WAI 3325

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IN THE MATTER OF the Treaty of Waitangi Act 1975

AND

IN THE MATTER OF the Climate Change Priority Inquiry

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MEMORANDUM OF COUNSEL FOR THE CROWN

1 Mei | May 2026

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1 May 26



**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:**

Nixon Fong / Grace Seeley / Claire Downey  
[nixon.fong@crownlaw.govt.nz](mailto:nixon.fong@crownlaw.govt.nz) / [grace.seeley@crownlaw.govt.nz](mailto:grace.seeley@crownlaw.govt.nz) /  
[claire.downey@crownlaw.govt.nz](mailto:claire.downey@crownlaw.govt.nz)

**Barrister instructed:**

Jeremy Prebble  
[jeremy.prebble@hawkestone.co.nz](mailto:jeremy.prebble@hawkestone.co.nz)

RECEIVED

Waitangi Tribunal

1 May 26

Ministry of Justice  
WELLINGTON

**MAY IT PLEASE THE TRIBUNAL:**

1. With this memorandum, the Crown files the Cabinet paper and appendix containing further advice on critical minerals and next steps, as referred to in the supplementary brief of evidence of Paul Stocks and the brief of evidence of Grahame Morton.<sup>1</sup>
2. Counsel apologise for the delay in filing this material, noting however that it has already been proactively released and available online at: [Further advice on critical minerals and next steps](#).
3. The Cabinet material is attached as **Appendix A**.

1 Mei | May 2026



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J Prebble / N Fong / G Seeley / C Downey  
Counsel for the Crown

**TO:** The Registrar, Waitangi Tribunal  
**AND TO:** Claimant Counsel

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<sup>1</sup> Supplementary brief of evidence of Paul Stocks, dated 22 April 2026 (Wai 3325, #A122(b)); Brief of evidence of Grahame Morton, dated 22 April 2026 (Wai 3325, #A155).