

14 December 2018

Sir Terence Arnold QC and Sir Geoffrey Palmer QC  
Government Inquiry into Operation Burnham and related matters

By email: [operationburnham@inquiry.govt.nz](mailto:operationburnham@inquiry.govt.nz)

Tēnā kōrua,

**OP BURNHAM Inquiry: Request for extension of timetable for production**  
**Our Ref: EXT020/1060**

1. In minute number 6, the Inquiry made an order under s 20 of the Inquiries Act 2013 requiring the Ministry of Foreign Affairs and Trade (**MFAT**) to produce all relevant material within its possession and control, and for which it does not need the consent of an overseas partner, by 5pm on Friday 14 December 2018 (**order**). The order also requires MFAT to verify, by way of statutory declaration, that all relevant material has been provided to the Inquiry.
2. MFAT is reasonably confident that it has now identified and collated all material covered by the order. However, unfortunately, due to a number of circumstances which have impacted the capacity of the team within MFAT over the period since the order was issued, MFAT have not yet been able to complete the process of reviewing the material to a point where a statutory declaration can be made. Furthermore, MFAT requires further time to collate the material into a form that will most assist the Inquiry (for example, by grouping documents into relevant categories). MFAT is confident it can complete this process within a further week.
3. Accordingly, MFAT respectfully requests an extension to the timetable for production of the material under the order until 5pm on 21 December 2018.
4. Please do not hesitate to contact me if you require any further information.

Yours faithfully

**Crown Law**



Ian Auld  
Crown Counsel