

BEFORE THE WAITANGI TRIBUNAL

WAI 3325

UNDER

the Treaty of Waitangi Act  
1975

IN THE MATTER OF

the Climate Change Priority  
Inquiry (Wai 3325)

AND

IN THE MATTER OF

a claim by Donna Kerridge,  
Pita Tipene, Moana  
Maniapoto, Dr George  
Laking, India Logan-Riley,  
Dr Maria Bargh, and Aroha  
Te Pareake Mead for and on  
behalf of Ngā Toki  
Whakarururanga (Wai  
3395).

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MEMORANDUM ON TIMELINES OF FREE TRADE AGREEMENTS AND  
INTERNATIONAL INVESTMENT PROTECTIONS

Dated this 3<sup>rd</sup> day of February 2025

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RECEIVED Waitangi Tribunal
<b>3 Feb 25</b>
Ministry of Justice WELLINGTON



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## TĒNĀ E TE TARAIPUNARA

1. This Memorandum of Counsel is filed on behalf of the claimants for Wai 3395.
2. Counsel have provided with this memorandum a document containing two timelines, which counsel consider will assist the Tribunal:
  - a. A timeline of free trade agreements, alongside climate initiatives relevant to free trade agreements; and
  - b. A timeline of developments regarding international investment protections and investor-state dispute settlement (ISDS).
3. It is anticipated that this timeline will assist the Tribunal in considering the evidence of Professor Jane Kelsey, which is yet to be heard.

**Dated** this 3<sup>rd</sup> day of February 2025



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Annette Sykes



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Sam Vincent

Counsel for the Claimants