IN THE WAITANGI TRIBUNAL

WAI 3325
WAI 3262

IN THE MATTER	of the Treaty of Waitangi Act 1975
AND	
IN THE MATTER	of the Climate Change Priority Inquiry
AND	
IN THE MATTER	of a claim by Emily Tuhi-Ao Bailey on behalf of herself and Climate Justice Taranaki

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MEMORANDUM OF COUNSEL
Dated: 7 March 2025

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Waitangi Tribunal
7 Mar 25
Ministry of Justice
WELLINGTON

BENNION LAW

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MAY IT PLEASE THE TRIBUNAL:

1. This memorandum is filed on behalf of Wai 3262, a claim by Emily Tuhi-Ao Bailey on behalf of herself and Climate Justice Taranaki.

2. Evidence to be presented at hearing two was directed to be filed by 7 March 2025.[1] Ms Bailey is scheduled to reappear at hearing two and intends to present updated targets in the Toitū Taranki 2030 document,[2] considering the policy changes made since the document was published in 2021.

3. Unfortunately, we have been unable to finalise Ms Bailey's evidence this week due to competing priorities. Counsel respectfully seek an extension till 14 March 2025 to do so and submit that minimal prejudice should occur given that Ms Bailey and the Toitū Taranaki document is known to the Tribunal and the Crown.

Dated at Wellington this 7th day of March 2025

Tom Bennion / Emma Whiley / Kudrat
Counsel for Wai 3262

1 Wai 3325, #2.6.4 at [9].
2 Wai 3325, #3.2.13(a).