OFFICIAL

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	**Wai 3382 and Wai 3281**.

MEMORANDUM OF COUNSEL

Dated this 20th day of March 2025

RECEIVED
Waitangi Tribunal
20 Mar 25
Ministry of Justice
WELLINGTON

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barristers & solicitors

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MAY IT PLEASE THE TRIBUNAL

1. This Memorandum of Counsel is filed on behalf of the following claims:

    a. Wai 3382, a claim by Mere Brooks, John Hooker, Alan Joseph Fred Hooker and Allen Webb for and on behalf of members of their respective hapū of Ngāruahine; and

    b. Wai 3281, a claim by Colleen Skerrett-White for and on behalf of her whānau, hapū, and iwi.

2. The Tribunal directed that cross-examination indications (including time and topic indications) were to be filed by 17 March 2025. Counsel have both dealt with urgent matters this week and apologise for the delay in giving this indication. Leave is sought for the same.

3. Counsel seek leave to question the following witnesses:

    a. Dr Brendon Dunphy on the possible causal connections between climate change, coastal cliff erosion in the rohe of Ōkahu-Inuāwai hapū in South Taranaki, and significant observed losses of coastal species traditionally used for kai moana in this area.

        i. It is estimated that evidence on this issue may last up to 10 minutes.

    b. Emily Bailey on gross/net emission fraud.

        i. It is estimated that evidence on this may last five minutes.

    c. Adrian Pucker on the emissions trading scheme and Māori carbon liability.

        i. It is estimated that evidence on this may last five minutes.

    d. Wayne Ngata on te ao Māori climate change responses.

        i. It is estimated that evidence on this may last five minutes.

e. Moerangi Potiki and Roana Bennett on the Maketū Climate Adaptation Plan.

    i. It is estimated that evidence on this may last five minutes.

Dated this 20th day of March 2025

Annette Sykes

Sam Vincent

Counsel for the Claimants