OFFICIAL

IN THE WAITANGI TRIBUNAL
KEI MUA I TE TARAIPIUNARA

WAI 3325
WAI 3279

UNDER — **The Treaty of Waitangi Act 1975**

CONCERNING — **The Climate Change Priority Inquiry**

AND — **Te Upokorehe Future Generations Climate Change Claim**

MEMORANDUM OF COUNSEL FILING EVIDENCE FOR HEARING WEEK TWO

Te Upokorehe Future Generations Climate Change Claim

Dated: 7 March 2025

RECEIVED
Waitangi Tribunal
7 Mar 25
Ministry of Justice
WELLINGTON

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TĒNĀ, E TE TAIRAIPIUNARA,

1. This memorandum of counsel is filed by the claimants in the Wai 3279 Te Upokorehe Future Generations Climate Change Claim.

Hearing Week 2

2. Claimants wishing to present in hearing week two have been directed to file their evidence by 7 March 2025. The following documents are presented for filing in accordance with that deadline:

    a. Joint brief of evidence of Wallace Aramoana and Maude Edwards and indexed exhibits to the Joint Brief of Evidence of Maude Edwards WAME-1 to WAME-6.

    b. Brief of evidence of Ngaire Ngamoki and exhibit A to the brief of evidence of Ngaire Ngamoki.

    c. Brief of evidence of Aroha Wikotu.

    d. Brief of evidence of Christine Martin.

    e. Brief of evidence of Kahukore Baker and Exhibit A to brief of evidence of Kahukore Baker.

    f. Brief of evidence of Larian Tuari and PowerPoint presentation.

    g. Brief of evidence of Suzette Klock and PowerPoint presentation.

    h. Brief of evidence of Te Mauri Keno and PowerPoint presentation.

3. The claimants have previously filed evidence through Trevor Ransfield, which is recorded as document Wai 3279 #A1 and #A1(a). Mr Ransfield will also present evidence during hearing week 2, and has elected not to file an updated affidavit.

4. All of the above briefs are unsigned, as our intention is to have the witnesses sign the briefs as they are presented and then file the signed brief.

Expert Evidence

5. We also file a brief of evidence and report by Associate Professor Brendon Dunphy entitled *Impact of climate change within coastal and intertidal areas of Aotearoa/New Zealand.* As this is expert evidence, in accordance with the Tribunal's directions this will not be presented as a part of the upcoming hearing weeks 2 or 3. Dr Dunphy will be available for conferencing if that assists.

Extension

6. One further brief of evidence is being completed by Gaylene Kohunui. We respectfully seek an extension of the filing deadline for hearing week 2 evidence until 5PM Monday 10 March to file this evidence.

Dated: 7 March 2025

Bryce Lyall
Counsel for Te Upokorehe

Maithili Sreen

Hannah Swedlund