OFFICIAL

IN THE WAITANGI TRIBUNAL

WAI 3325
WAI 3262
WAI 2139
WAI 507

IN THE MATTER AND	of the Treaty of Waitangi Act 1975
IN THE MATTER AND	of the Climate Change Priority Inquiry (Wai 3325)
IN THE MATTER AND	of a claim by Emily Tuhi-Ao Bailey on behalf of herself and Climate Justice Taranaki (Wai 3262)
IN THE MATTER AND	of a claim by Tim Tukapua and Dennis Greenland on behalf of the Muaūpoko Tribal Authority (Wai 2139)
IN THE MATTER	of a claim by Mr Owen Lloyd on behalf of Ngā Ariki Kaiputahi (Wai 507)

MEMORANDUM OF COUNSEL
Dated: 17 March 2025

RECEIVED
Waitangi Tribunal
18 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:

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

   b. Wai 2139, claim by Tim Tukapua and Dennis Greenland on behalf of the Muaūpoko Tribal Authority; and

   c. Wai 507, a claim by Mr Owen Lloyd on behalf of Ngā Ariki Kaiputahi.

2. And in response to memorandum-directions directing requests to cross-examine hearing two witnesses with time and topic indications be filed by 17 March 2025.[1]

3. We seek leave to cross-examine the following witnesses:

Witness	Topic	Time
Dr James Everly-Palmer KC	• Reliance on offsets to reduce emissions	30 minutes
Alison Cole	• Māori involvement in international forums	5 minutes
Jane Kelsey	• Blue carbon • Māori involvement in international forums	15 minutes
John Hooker	• Native forests in Taranaki	5 minutes

Dated at Wellington this 17th day of March 2025

Tom Bennion / Emma Whiley / Kudrat
Counsel for the claimants

[1] Wai 3325, #2.6.4.