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IN THE WAITANGI TRIBUNAL **KEI MUA I TE TARAIPIUNARA**	**WAI 3325** **WAI 421** **WAI 593** **WAI 869** **WAI 1383** **WAI 1890** **WAI 3278** **WAI 3288** **WAI 3279**
UNDER	**The Treaty of Waitangi Act 1975**
CONCERNING	**The Climate Change Priority Inquiry**
AND	**Wai 421, Wai 593, Wai 869, Wai 1383, and Wai 1890**
AND	**Wai 3278**
AND	**Wai 3279**
AND	**Wai 3288**

JOINT MEMORANDUM OF COUNSEL

Dated: 24 October 2025

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KŌKIRI CHAMBERS

RECEIVED
Waitangi Tribunal
24 Oct 25
Ministry of Justice
WELLINGTON

MAY IT PLEASE THE TRIBUNAL

KIA WHAKAAE MAI TE TARAIPIUNARA

1. This joint memorandum of counsel is filed on behalf of the following claimants:

    a. Te Waimate Taiamai ki Kaikohe Claims Alliance (Wai 421, Wai 593, Wai 869, Wai 1383, Wai 1890);

    b. The Ngāti Ruapani ki Waikaremoana Climate Change Claim (Wai 3278);

    c. The Ngāti Porou ki Hauraki Climate Change Claim (Wai 3288); and

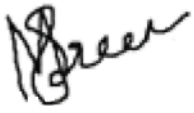
    d. Te Upokorehe Future Generations Climate Change Claim (Wai Wai 3279).

2. On 17 October 2025, Prof. Alexandra Macmillan presented evidence to the Tribunal. This evidence can be found at Wai 3325, #A76.

3. The purpose of this joint memorandum of counsel is to file Prof. Macmillan's speaking notes and PowerPoint presentation.

4. To note, Prof. Macmillan makes a preliminary response to the evidence of Dr Andrew Old within the speaking notes. This will later be filed as evidence in reply, in accordance with the timetable.

Dated: 24 October 2025



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