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| **IN THE WAITANGI TRIBUNAL** | **WAI 3325**<br>**WAI 3285** |
| **CONCERNING** | the Treaty of Waitangi Act 1975 |
| **AND**<br>**IN THE MATTER OF** | The Climate Change Priority Inquiry |
| **AND**<br>**IN THE MATTER OF.** | A claim by Lani Kereopa, Nicki Douglas, Roana Bennett and Mariana Te Rangi for and on behalf of themselves as representatives of their whānau, hapū and iwi and as representatives of Te Urunga o Kea the Te Arawa Climate Change Working Group |

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**MEMORANDUM OF COUNSEL FILING**
**ANSWERS TO QUESTIONS OF DR CLAIRE WINFIELD NGAMIHI CHARTERS**

**Dated this 7th day of November 2025**

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TE WHENUA LAW

Tania Te Whenua
Principal
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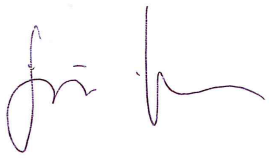
RECEIVED
Waitangi Tribunal
*7 Nov 25*
Ministry of Justice
WELLINGTON

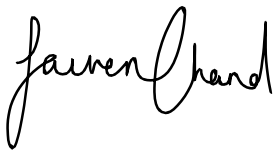
**MAY IT PLEASE THE TRIBUNAL**

1. This memorandum of counsel is filed on behalf of Lani Kereopa, Nicki Douglas, Roana Bennett and Mariana Te Rangi for and on behalf of themselves as representatives of their whānau, hapū and iwi and as representatives of Te Urunga o Kea the Te Arawa Climate Change Working Group (Wai 3285).

2. This memorandum accompanies for filing the answers to questions that were asked of Dr Charters by members of the Waitangi Tribunal Panel following the presentation of her Brief of Evidence dated 6 May 2025[1] during Hearing Week Four.

DATED this 7th day of November 2025





…….
Tania Te Whenua
Claimant Counsel

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Lauren Chand
Claimant Counsel

[1] Brief of Evidence of Dr Claire Charters Wai 3325, #A81.