

**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 3281 and Wai 3382.**

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**MEMORANDUM OF COUNSEL**

Dated this 25<sup>th</sup> day of November 2025

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**ANNETTE  
SYKES & Co.**  
barristers & solicitors

**Annette Sykes & Co**  
Barristers & Solicitors  
8 – Unit 1 Marguerita Street  
Rotorua, 3010  
Phone: 07-460-0433

**Counsel Acting:** Annette Sykes, Sam Vincent  
**Email:** [asykes@annettesykes.com](mailto:asykes@annettesykes.com); [sam@annettesykes.com](mailto:sam@annettesykes.com)

<b>RECEIVED</b> Waitangi Tribunal
<b>26 Nov 25</b>
Ministry of Justice WELLINGTON

**MAY IT PLEASE THE TRIBUNAL:**

1. This memorandum of counsel is filed on behalf of:
  - a) Wai 3281, a claim by Colleen-Skerrett-White on behalf of her whānau, hapū, iwi, whānau whānui, and whāngai; and
  - b) 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.
2. An updated PowerPoint presentation of Professor Cate Macinnis-Ng and Dr Jonathan Tonkin for their presentation in Hearing Five is provided with this memorandum.
3. The PowerPoint presentation now includes, from slide 40 onwards, Professor Macinnis-Ng's reply evidence.

**Dated** this 25<sup>th</sup> day of November 2025



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Annette Sykes



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Sam Vincent

Counsel for the Claimants