

IN THE WAITANGI TRIBUNAL

**WAI 3325
WAI 3285**

CONCERNING

the Treaty of Waitangi Act
1975

**AND
IN THE MATTER OF**

The Climate Change
Priority Inquiry

**AND
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

**MEMORANDUM OF COUNSEL FILING
REPLY EVIDENCE OF DR CLAIRE WINFIELD NGAMIHI CHARTERS**

Dated this 26th day of February 2026



Tania Te Whenua
Principal
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RECEIVED

Waitangi Tribunal

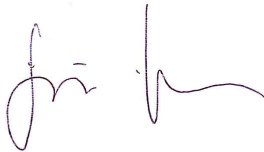
26 Feb 26

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. In memorandum-directions dated 10 December 2025, her Honour Judge Milroy directed that reply evidence must be filed by no later than 5pm, Thursday 26 February 2026.¹
3. Accordingly, this memorandum accompanies for filing the reply evidence of Dr Charters, in response to the brief of evidence of Ms Victoria Louise Hallum.²

DATED this 26th day of February 2026



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Tania Te Whenua
Claimant Counsel



.....
Lauren Chand
Claimant Counsel

¹ Wai 3325 #2.6.020.

² Wai 3325, #137.