KEI MUA I TE AROARO O TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI	**WAI 3325**
	WAI 2607
BEFORE THE WAITANGI TRIBUNAL	**WAI 3412**
	WAI 3413
	WAI 3414

IN THE MATTER OF	The Treaty of Waitangi Act 1975
AND	
IN THE MATTER OF	The Climate Change Priority Inquiry
AND	
IN THE MATTER OF	A claim by Tane Cook on behalf of himself and Mataatua District Māori Council (Wai 2607)
AND	
IN THE MATTER OF	A claim by Jennifer Takuta-Moses on behalf of herself and the Wairoa Māori Committee (Wai 3412)
AND	
IN THE MATTER OF	A claim by Grace Hoet on behalf of herself and the New Zealand Māori Council (Wai 3413)
AND	
IN THE MATTER OF	A claim by Anthony Olsen on behalf of himself and the Matiti Māori Committee

MEMORANDUM OF COUNSEL

26 March 2026

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Waitangi Tribunal
26 Mar 26
Ministry of Justice
WELLINGTON

E TE KAIWHAKAWĀ, TĒNĀ KOE.

1. This memorandum is filed on behalf of the following claims:

   1.1 Tane Cook on behalf of himself and the Mataatua District Māori Council (Wai 2607);

   1.2 Jennifer Takuta-Moses on behalf of herself and the Wairoa Māori Committee (Wai 3412);

   1.3 Grace Hoet on behalf of herself and the New Zealand Māori Council (Wai 3413); and

   1.4 Anthony Olsen on behalf of himself and the Matiti Māori Committee (Wai 3414), ("the Claimants").

2. The Tribunal directed that questions in writing for Crown witnesses arising from Hearing Week Six were to be filed by 26 March 2026.

3. Accordingly, filed alongside this memorandum as Appendix A – Further Questions in Writing are the written questions for the Crown witnesses: Anne Haira and Gina Rangi; Kay Harrison, Rebecca Prebble and Bryan Smith and Mandel-Johnson.

Dated at **Wellington** this 26 March 2026.

Donna Hall
Woodward Law
Counsel for the Claimants

Darshini Dorn
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Counsel for the Claimants