KEI MUA I TE AROARO O TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI **WAI 3325**

Before the Waitangi Tribunal

I TE TAKE O *In the matter of*	The Treaty of Waitangi Act 1975
KO *And*	
I TE TAKE O *In the matter of*	the Climate Change Priority Inquiry
KO *And*	
I TE TAKE O *In the matter of*	**Wai 2494, Wai 3281, Wai 3382, and Wai 3395.**

JOINT MEMORANDUM OF COUNSEL FOR WAI 2494, WAI 3281, WAI 3382 AND WAI 3395

(Cross-examination indications for Hearing Seven)

31 Māehe 2026 / 31 March 2026

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TĒNĀ, E TE TARAIPIUNARA

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

    1.1. Wai 2494, a claim by Donna Awatere-Huata on behalf of herself, her whānau, hapū and iwi and all Māori;

    1.2. Wai 3281, a claim by Colleen Skerrett-White for and on behalf of her whānau, hapū, iwi;

    1.3. 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;

    1.4. Wai 3395, a claim by Donna Kerridge, Pita Tipene, Moana Maniapoto, Dr George Laking, India Logan-Riley, Dr Maria Bargh, and Aroha Te Pareake Mead for and on behalf of Ngā Toki Whakarururanga.

2. Counsel seek leave to cross-examine the following witnesses in Hearing Seven, for the given times and on the topics indicated:

    2.1. Robyn Julie Collins and Samuel Keenan: 10 minutes (protection of indigenous forest and the Maximising Forest Carbon Programme);

    2.2. Robyn Julie Collins: 30 minutes (tradeoffs between siviculture and agriculture in ETS/MPI policy, predictions on forestry planting, policy on land use changes);

    2.3. Paul Stocks: 45 minutes (exploitation of petroleum and Te Tiriti, exploitation of critical minerals and Te Tiriti, development of wind energy and Te Tiriti);

    2.4. Kirstie Knowles and Catherine Wilson: 15 minutes (biodiversity protections in the face of climate change);

    2.5. Kieran Murray: 40 minutes (the Māori economy, impact of delay on decision-making economics of the ETS);

    2.6. Helen Plume: 5 minutes (monitoring of the Climate Change Commission with respect to the Crown's Tiriti obligations);

2.7. Jenna Rogers and Dwain Hindriksen: 30 minutes (process of building capacity to engage with tangata whenua; division of responsibilities between local and central government);

2.8. Paula Rawiri: 20 minutes (use of the IDI, definition of Māori economy/hāpori Māori).

3. It is anticipated that cross-examination time will also be sought for Grahame Morton, whose brief of evidence has not yet been filed.

Dated: 31 Māehe / 31 March 2026

Annette Sykes	Scott Fletcher	Sam Vincent