KEI MUA I TE AROARO O TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI

WAI 3325

WAI 2607

BEFORE THE WAITANGI TRIBUNAL

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)

MEMORANDUM OF COUNSEL

19 May 2026

RECEIVED
Waitangi Tribunal
20 May 26
Ministry of Justice
WELLINGTON

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TĒNĀ, E TE TARAIPIUNARA

1. This memorandum is filed on behalf of Tane Cook on behalf of himself and the Mataatua District Māori Council (Wai 2607).

2. By way of memorandum-directions dated 8 May 2026, counsel are directed to file supplementary material for hearing eight briefs of evidence.[1]

3. Professor Timothy Naish is appearing in next week's hearing eight to provide an update to his previous evidence presented in hearing week four held in October 2025.

4. This includes the latest scientific updates for climate change and the most recent climate change reports that have been released including:

   4.1 The UN Emissions Gap report 2025 delivered in November 2025;

   4.2 The UN adaption gap report 2025 dated 29 October 2025;

   4.3 The World Meteorological Organisation (WMO) Report State of the Climate Update for COP30 dated 6 November 2025;

   4.4 And the WMO Report "State of the Global Climate 2025" dated 23 March 2026.

5. Counsel respectfully seeks leave for Professor Naish to present this updated evidence and submits that it will assist the Tribunal by ensuring it has the most up-to-date scientific research before the completion of the Inquiry.

6. Accordingly, filed alongside this memorandum is the power-point presentation to accompany Professor Tim Naish's oral evidence.

[1] Wai 3325, #2.6.29(a).

Dated at **Wellington** this 19 May 2026.

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