IN THE WAITANGI TRIBUNAL **KEI MUA I TE TARAIPIUNARA**	**WAI 3325** **WAI 421** **WAI 593** **WAI 869** **WAI 1383** **WAI 1890** **WAI 3278** **WAI 3288** **WAI 3279**
UNDER	**The Treaty of Waitangi Act 1975**
CONCERNING	**The Climate Change Priority Inquiry**
AND	**Te Waimate Taiamai ki Kaikohe Claims Alliance (Wai 421, Wai 593, Wai 869, Wai 1383, and Wai 1890)**
AND	**Ngāti Ruapani ki Waikaremoana (Wai 3278)**
AND	**Te Upokorehe Iwi (Wai 3279)**
AND	**Ngāti Porou ki Hauraki (Wai 3288)**

JOINT MEMORANDUM OF COUNSEL FILING QUESTION IN WRITING FOR DR NAISH

Dated: 27 May 2026

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TĒNĀ, E TE TARAIPIUNARA

1. Today counsel was granted leave to ask a question of Dr Naish in writing.

2. In his evidence to the Tribunal for the Crown, Kieran Murray made the following statements in his #A127 evidence (with my emphasis added):

    a. Paragraph [33]:

> Climate change is occurring because of the activities of billions of people globally. **Unfortunately, no policy implemented by the New Zealand government will make a perceptible change to the climate as it will impact Māori** (whether defined broadly as Māori in the economy or the Māori economy). **Human activities in New Zealand are too minor, on a world scale, to alter climate**. New Zealand's emissions account for about 0.15 per cent of global emissions.

    b. Paragraph [37]:

> However, recognising that government policy would not perceptibly alter climate helps clarify the economic trade-offs of policy choices. **Stronger action to reduce emissions, as advocated in the evidence (listed in paragraph 10) above, would not materially improve climate outcomes for the Māori (or anyone else).** Those policy choices,

though, could be detrimental for the Māori economy and for Māori in the economy.

3. In evidence today Dr Naish discussed the rapidly developing field of climate attribution science, which can now link specific emissions to specific harms with increasing precision.

4. The questions that we have are:

   Dr Naish, based on your knowledge, and with Mr Murray's assertions in mind:

   a. Does Mr Murray's statement that "human activities in New Zealand are too minor, on a world scale, to alter climate" accord with the science? If not, can you explain why.

   b. Does climate attribution science provide a scientific basis for assessing the contribution of specific emissions sources to climate impacts on Māori (or other specific groups in Aotearoa)? If so, can you provide examples? If not, can you elaborate on the reasons for this?

Dated: 27 May 2026

Bryce Lyall
Counsel for the Claimants