IN THE WAITANGI TRIBUNAL	**WAI 3325** **WAI 3285** **WAI 3286**
CONCERNING	the Treaty of Waitangi Act 1975
AND **IN THE MATTER OF**	The Climate Change Priority Inquiry (Wai 3325)
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 (Wai 3285)

MEMORANDUM OF COUNSEL
FILING GENERIC CLOSING SUBMISSIONS

Dated this 25th day of September 2026

RECEIVED
Waitangi Tribunal
25 Sep 26
Ministry of Justice
WELLINGTON

TE WHENUA LAW

Tania Te Whenua
Principal
P: 021 026 00026
E: tania@tewhenua.nz

AND
IN THE MATTER OF

A claim by Tui Aroha Warmenhoven on behalf of herself as Trustee and Chair of Umuariki Marae and members of Ngāti Rangi Hapū and Te Whānau a Umuariki Hapū of Ngāti Uepōhatu Iwi of Te Papatipu o Uepohatu of the Ruatoria District (Wai 3286)

MAY IT PLEASE THE TRIBUNAL

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

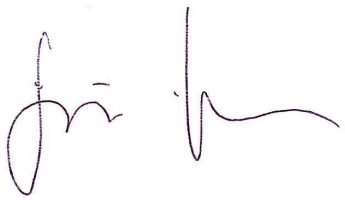
    a. Lani Kereopa, Nicki Douglas, Roana Bennett and Mariana Te Rangi for and on behalf of themselves as representatives of their whānau, hapū and iwi and as representatives of Te Urunga o Kea the Te Arawa Climate Change Working Group (Wai 3285); and

    b. Tui Aroha Warmenhoven as Trustee and Chair of Umuariki Marae for members of Ngāti Rangi Hapū and Te Whānau a Umuariki Hapū of Ngāti Uepōhatu Iwi of Te Papatipu o Uepōhatu of the Ruatoria District (Wai 3286).

2. On 2 September 2026, the Tribunal advised parties that generic closing submissions for claimant counsel were to be filed by 5.00 pm on 22 September 2026.

3. Accordingly **appended** to this memorandum for filing are the generic closing submissions concerning climate change impacts on Māori.

DATED this 25th day of September 2026



……..
Tania Te Whenua
Claimant Counsel