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

MEMORANDUM OF COUNSEL FILING GENERIC CLAIMANT CLOSING SUBMISSIONS RELATING TO CROWN – MĀORI ENGAGEMENT

Dated 6 October 2026

RECEIVED
Waitangi Tribunal
7 Oct 26
Ministry of Justice
WELLINGTON

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1. This memorandum of counsel is filed in respect of generic closing submissions.

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.

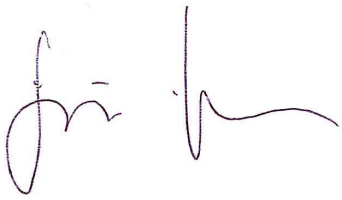
3. By way of email dated 5 October 2026, her Honour Judge Milroy directed claimant counsel who are yet to file specific closing submissions, and their corresponding synopses, to file by no later than 5pm, Monday 5 October 2026.

4. By memorandum of counsel dated 5 October, counsel advised the Tribunal that together with Michael Sharp counsel had consolidated closing submissions on climate change and international law; and Crown – Māori engagement and sought leave to file those as generic closing submissions by 6 October.

5. My email dated 6 October leave was granted noting that no further extensions would be entertained.

6. Accordingly appended to this memorandum for filing are the generic closing submissions concerning climate change and Crown – Māori engagement along with synopsis.

DATED this 6th day of October 2026



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Michael Sharp
Claimant Counsel

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Danica Loulié-Wijtenburg
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