

COP30 Presidency Roadmap for Transitioning Away from Fossil Fuels in a Just, Orderly and Equitable Manner

Submission by the International Union for Conservation of Nature (IUCN)

I. Introduction

The International Union for Conservation of Nature (IUCN) welcomes the invitation of the COP30 Presidency to contribute to the [Roadmap](#) on "transitioning away from fossil fuels in energy systems, in a just, orderly and equitable manner," as called for in paragraph 28(d) of the outcome of the first Global Stocktake (GST1), adopted at COP28 in Dubai on 13 December 2023.¹

This submission is informed by various [resolutions](#) adopted by IUCN's 1400+ members at its *World Conservation Congresses*, and by its active participation in the International Court of Justice (ICJ) advisory proceedings on the *Obligations of States in Respect of Climate Change*, in which IUCN filed in addition to its Written and Oral Statements, a Reply to the question posed by Judge Cleveland specifically addressing the obligations of States in respect of fossil fuel production.² IUCN draws particular attention to the ICJ's Advisory Opinion of 23 July 2025³ (hereinafter, the "ICJ Advisory Opinion"), which constitutes the most authoritative statement to date on the content and legal character of States' obligations with respect to climate change, including in relation to fossil fuel production, licensing, consumption and subsidisation. That Opinion, together with the earlier Advisory Opinion of the International Tribunal for the Law of the Sea (ITLOS) of 21 May 2024,⁴ provides the legal scaffolding for the observations advanced herein.

This submission responds systematically to the four guiding questions set out in Part I of the Presidency's Invitation. It draws on: (i) the IUCN submissions to the ICJ and the ICJ Advisory Opinion itself; (ii) ITLOS and European Court of Human Rights (ECtHR) jurisprudence; (iii) pertinent IPCC scientific assessments; (iv) relevant treaty obligations and customary international law; and (v) emerging domestic and regional legislative practice. The overarching submission is that the "transitioning away" commitment in GST1 paragraph 28(d) carries normative legal weight. It informs the applicable due diligence standard under the Paris

¹UNFCCC, Decision 1/CMA.5, *Outcome of the First Global Stocktake* (13 December 2023) UN Doc FCCC/PA/CMA/2023/16/Add.1, para 28(d).

²IUCN World Commission on Environmental Law and International Union for Conservation of Nature, Written Statement to the International Court of Justice in the Proceedings on *Obligations of States in Respect of Climate Change* (2024); Written Comments and Reply to the Question Posed by Judge Cleveland.

³*Obligations of States in Respect of Climate Change* (Advisory Opinion) [2025] ICJ Rep (23 July 2025) (hereinafter 'ICJ Advisory Opinion').

⁴Request for an Advisory Opinion Submitted by the Commission of Small Island States on Climate Change and International Law (Advisory Opinion) ITLOS Case No 31 (21 May 2024) (hereinafter 'ITLOS Advisory Opinion').

Agreement,⁵ the UNFCCC,⁶ customary international law and international human rights law, and accordingly provides a legally grounded basis upon which the Roadmap may proceed.

II. Critical Barriers Preventing a Transition Away from Fossil Fuels

A. Legal and Institutional Barriers

A primary and systemic barrier to a transition is the continuing existence of domestic legal regimes that facilitate, incentivise or protect fossil fuel expansion, notwithstanding States' obligation — confirmed by the ICJ — to "take all necessary measures" to prevent significant harm to the climate system. As the ICJ Advisory Opinion expressly recognises, "the licensing of exploration [and] production, subsidising and consuming fossil fuels all constitute conduct that could be in breach of customary international law and conventional obligations."⁷ Yet existing legal frameworks — including investment treaties with investor-State dispute settlement (ISDS) clauses, domestic licensing regimes, and tax and fiscal arrangements — continue to confer substantial protection on new coal, oil and gas projects, creating legal and economic path dependencies that entrench carbon lock-in and militate against the discharge of the "highest possible ambition" standard enshrined in Article 4.3 of the Paris Agreement.⁸

Environmental impact assessment (EIA) practice represents a particularly acute institutional gap. Until recently, the prevailing administrative practice in many jurisdictions was to exclude lifecycle (Scope 3) greenhouse gas emissions, those arising from the eventual combustion of exported fossil fuels, from the scope of project-level EIAs. This approach was authoritatively rejected by the United Kingdom Supreme Court in *R (Finch on behalf of the Weald Action Group) v Surrey County Council*,⁹ which held that downstream combustion emissions from burning extracted oil were "direct and indirect significant effects of a project" for the purposes of EIA legislation, and that their omission from the assessment rendered the grant of planning permission unlawful. The *Finch* judgment aligns with IUCN's submissions to the ICJ that downstream combustion emissions are reasonably foreseeable and must be assessed wherever significant transboundary harm is anticipated. The absence of mandatory Scope 3 assessment across the majority of producer State jurisdictions remains a critical institutional gap that the Roadmap should specifically address. The European Court of Human Rights established that Art. 8 of the European Convention on Human Rights requires member states to carry out a comprehensive EIA for petroleum activities of the effects of these activities on the climate, including the effects of combustion emissions in the territory of the states and abroad.¹⁰

⁵Paris Agreement (adopted 12 December 2015, entered into force 4 November 2016) UNTS 54113.

⁶United Nations Framework Convention on Climate Change (adopted 9 May 1992, entered into force 21 March 1994) 1771 UNTS 107.

⁷ICJ Advisory Opinion (n 3) para 94.

⁸Paris Agreement (n 5) art 4.3.

⁹*R (Finch on behalf of the Weald Action Group) v Surrey County Council* [2024] UKSC 20.

¹⁰*Greenpeace Nordic versus Norway*, (Application no. 34068/21) ECtHR, judgment 25 October 2025.

B. Economic and Financial Barriers

Fossil fuel subsidies constitute a profound and structurally embedded financial barrier. Subsidies across OECD and non-OECD members were conservatively estimated at USD 1.4 trillion in 2023,¹¹ distorting investment signals and directly conflicting with Paris Agreement Article 2.1(c)'s obligation to make "finance flows consistent with a pathway towards low greenhouse gas emissions and climate-resilient development."¹² The GST1 outcome's call to "phase out inefficient fossil fuel subsidies"¹³ remains largely unimplemented across most jurisdictions; reform continues to be impeded by fiscal dependence, distributional concerns and political economy dynamics in both producer and consumer States.

Compounding this, investment treaty protections — including stabilisation clauses and fair and equitable treatment (FET) standards — generate regulatory chill effects, deterring governments from enacting climate-consistent reforms to licensing and subsidy regimes out of fear of ISDS exposure. The Roadmap should accordingly identify treaty reform and ISDS carve-outs for genuine climate regulation as a priority enabling measure.

C. Physical and Systemic Risks from Carbon Lock-In

Carbon lock-in — the systemic inertia generated by long-lived fossil fuel infrastructure and its associated economic, institutional and social dependencies — represents a further category of barriers distinct from deliberate policy choices. Each year of deferred phase-out decisions increases cumulative emissions, narrows remaining carbon budgets and exponentially escalates future fiscal, social and adaptation costs. Governments collectively plan to produce approximately 110% more fossil fuels by 2030 than is consistent with a 1.5°C pathway, generating a structural "production gap" that is irreconcilable with GST1 commitments.¹⁴ Physical risks — including climate-amplified extreme weather events affecting fossil fuel extraction and transport infrastructure — further compound these vulnerabilities, particularly in coastal and Arctic producer regions.

D. Equity and Capacity Constraints

Developing States and those states with high economic dependence on fossil fuel revenues face particularly acute barriers absent robust international support. Sovereign debt burdens constrain the fiscal space required for just transition investments; technology gaps and skills shortages impede deployment of renewable and alternative energy systems; and asymmetric negotiating capacity in international financial institutions and treaty forums compounds structural disadvantage. These inequities underscored the foundational importance, reaffirmed by the ICJ Advisory Opinion, of the principle of common but differentiated responsibilities

¹¹OECD and IEA, *Fossil Fuel Subsidies* (OECD Publishing 2024); see also IMF, *Fiscal Monitor: Climate Crossroads* (IMF 2023) (noting global fossil fuel subsidies exceeded USD 1.4 trillion in 2023 in explicit subsidy terms).

¹²Paris Agreement (n 5) art 2.1(c).

¹³Decision 1/CMA.5 (n 1) para 28(h).

¹⁴UNEP, Stockholm Environment Institute et al, *The Production Gap Report 2023* (UNEP 2023) 5.

and respective capabilities (CBDR-RC) in the light of different national circumstances as a substantive modulator of the due diligence obligations owed by States at differing levels of development.¹⁵

III. Levers for Accelerating Implementation

The transition away from fossil fuels may be accelerated through a suite of complementary legal, policy, financial and institutional levers, calibrated in accordance with CBDR-RC principles and the differentiated nature of States' transition obligations.

A. Domestic Legal Implementation of International Climate Standards

States are legally required to translate their NDC obligations — to communicate contributions reflecting "highest possible ambition" with progression over time, informed by GST outcomes¹⁶ — into binding domestic legal frameworks. Enacting framework climate legislation that establishes quantified, science-based, 1.5°C-compatible carbon budgets, fossil fuel phase-out timelines and associated enforcement mechanisms operationalises international obligations in a domestically enforceable form, creating trajectories amenable to judicial review for conformity with applicable international standards. Such legislation removes the risk of regulatory backsliding and provides legal certainty for long-term investment transition planning.

B. Production-Side Obligations for Fossil Fuel Producer States

As elaborated in IUCN's Reply to Judge Cleveland's question, States within whose jurisdiction fossil fuels are produced bear in our view specific affirmative obligations to address embedded emissions from extraction and exports, encompassing monitoring, mandatory disclosure, regulation and the integration of cumulative Scope 3 combustion impacts into EIA processes.¹⁷ More fundamentally, the ICJ Advisory Opinion's confirmation that States' obligations extend to the "ongoing production, licensing and subsidizing of fossil fuels"¹⁸ implies that due diligence imposes a positive duty not to facilitate new fossil fuel development incompatible with 1.5°C pathways. This aligns with the conclusion of the International Energy Agency (IEA)'s *Net Zero by 2050* analysis, which establishes that — beyond projects already committed as of 2021 — no new oil, gas or coal fields or mines are consistent with a 1.5°C scenario.¹⁹

¹⁵Paris Agreement (n 5) Preamble; UNFCCC (n 7) art 3.1; ICJ Advisory Opinion (n 2).

¹⁶Paris Agreement (n 5) arts 4.3, 14.3.

¹⁷ ICJ Advisory Opinion (n 3); Paris Agreement (n 5) arts 9–10; *Corfu Channel Case (United Kingdom v Albania) (Merits)* [1949] ICJ Rep 4; *Case Concerning Pulp Mills on the River Uruguay (Argentina v Uruguay)* [2010] ICJ Rep 14.

¹⁸ ICJ Advisory Opinion (n 3)

¹⁹IEA, *Net Zero by 2050: A Roadmap for the Global Energy Sector* (IEA 2021) 21 (finding that beyond projects already committed as of 2021, no new oil, gas or coal fields or mines are consistent with a 1.5°C scenario).

C. Financial Flows Reform and Subsidy Phase-Out

The phasing out of inefficient fossil fuel subsidies pursuant to GST1 paragraph 28(h) would redirect upwards of USD 1 trillion annually towards Paris Agreement-consistent investments — including clean energy deployment, just transition measures, nature protection and adaptation finance in vulnerable States. Public finance institutions, including multilateral development banks (MDBs) and export credit agencies, must integrate explicit "no new fossil fuel" tests, consistent with Article 2.1(c) Paris Agreement. MDB reform — including enhanced lending capacity, reduced cost of capital for clean energy transition in developing States and removal of fossil-linked conditionalities — constitutes both a legal and practical imperative.

D. Human Rights and Procedural Dimensions

International human rights law imposes positive obligations on States to adopt measures necessary to protect the rights to life, health, adequate food and water, housing and a clean, healthy and sustainable environment against the adverse effects of climate change, including by transitioning away from fossil fuels. The Committee on the Rights of the Child, in its General Comment No 26 (2023), explicitly identifies "phasing out fossil fuels" as among the "immediate measures" required to fulfil children's environmental rights.²⁰ These obligations must be embedded in the Roadmap's framing. Procedural rights — including public participation, access to environmental information and access to judicial remedies, as enshrined in the Rio Declaration Principle 10 and operationalised through the Aarhus Convention and the Escazú Agreement²¹ — function as accountability levers, ensuring that transition processes reflect the voices of affected communities and are subject to independent scrutiny.

E. The Duty to Cooperate

The *erga omnes* character of States' obligations to protect the climate system, reaffirmed by the ICJ Advisory Opinion,²² generates a corresponding duty to cooperate that is not merely aspirational but legally operative. This duty — derived both from treaty law (Paris Agreement Articles 9–10) and from customary international law as reflected in the *Corfu Channel* principle and the *Pulp Mills* jurisprudence — requires developed States to provide technology transfer, capacity-building and climate finance to developing and fossil-dependent States, enabling managed and equitable transitions without disproportionate economic or social disruption.

²⁰UN Committee on the Rights of the Child, General Comment No 26 on Children's Rights and the Environment with a Special Focus on Climate Change (22 August 2023) UN Doc CRC/C/GC/26, para 35.

²¹Rio Declaration on Environment and Development (1992) Principle 10; Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (adopted 25 June 1998, entered into force 30 October 2001) 2161 UNTS 447 (Aarhus Convention); Regional Agreement on Access to Information, Public Participation and Justice in Environmental Matters in Latin America and the Caribbean (adopted 4 March 2018, entered into force 22 April 2021) (Escazú Agreement).

²²ICJ Advisory Opinion (n 3); Paris Agreement (n 5) arts 9–10; *Corfu Channel Case* (United Kingdom v Albania) (Merits) [1949] ICJ Rep 4; *Case Concerning Pulp Mills on the River Uruguay* (Argentina v Uruguay) [2010] ICJ Rep 14.

IV. Country, Regional and Sector Experiences, Best Practices and Lessons Learned

A. National and Regional Framework Legislation

Several jurisdictions have enacted framework legislation that provides replicable models for the domestic legal implementation of the "transitioning away" commitment. The EU Climate Law²³ establishes a legally binding EU-wide net-zero target by 2050, an intermediate 2030 emissions reduction target of at least 55%, and successive five-yearly National Energy and Climate Plans, through which EU Member States must disclose fossil fuel subsidies.²⁴ New Zealand's Climate Change Response (Zero Carbon) Amendment Act 2019,²⁵ and analogous legislation in Sweden, Denmark and Finland, further demonstrate the viability of science-based national carbon budget frameworks. Common features of these successful models include: independent climate advisory bodies; mandatory planning cycles linked to NDC update timescales; clear ministerial accountability; and judicial enforceability.

B. Judicially Enforced Climate Pathways

Domestic and international courts have increasingly affirmed States' obligations to adopt and implement science-based emission reduction trajectories. For example, in *KlimaSeniorinnen*, the ECtHR Grand Chamber held that Switzerland had violated Article 8 of the European Convention on Human Rights by failing to establish a domestic regulatory framework — including a carbon budget or quantified GHG emission limitations — adequate to meet its positive obligations with respect to climate change, and by failing to achieve its own previously announced emission reduction targets.²⁶ In the domestic sphere, *R (Finch) v Surrey County Council*²⁷ represents a further precedent requiring mandatory Scope 3 EIA in fossil fuel licensing decisions, with significant implications for producer States' licensing regimes globally. Analogous litigation in Norway challenging North Sea oil licensing decisions reflects the expanding body of domestic jurisprudence scrutinising the compatibility of fossil fuel expansion with States' international climate commitments.²⁸

²³Regulation (EU) 2021/1119 of the European Parliament and of the Council of 30 June 2021 Establishing the Framework for Achieving Climate Neutrality [2021] OJ L243/1 (European Climate Law).

²⁴ Commission Implementing Regulation (EU) 2022/2299 of 13 July 2022 laying down rules for the application of Regulation (EU) 2018/1999 as regards the structure, format, technical details and process for the integrated national energy and climate plans [2022] OJ L306/1, Annex VIII; Annex XV.

²⁵Climate Change Response (Zero Carbon) Amendment Act 2019 (New Zealand).

²⁶*Verein KlimaSeniorinnen Schweiz and Others v Switzerland* App No 53600/20 (ECtHR Grand Chamber, 9 April 2024) paras 573–574 (finding a violation of art 8 ECHR due to the absence of an adequate domestic regulatory framework including a carbon budget or quantified GHG emission limitations).

²⁷*Finch* (n 9).

²⁸*Natur og Ungdom v Norway*, Borgarting Court of Appeal, Case No LB-2021-123981 (appeal proceedings ongoing before the Supreme Court of Norway); see also *Greenpeace Nordic v Norway* (Supreme Court of Norway, 22 December 2020) HR-2020-2472-P.

C. Multilateral and Sectoral Transition Initiatives

The Powering Past Coal Alliance (PPCA), with more than 60 national and subnational members, demonstrates the feasibility of orderly coal phase-out through differentiated national timelines, site repurposing programmes and targeted social protection measures for affected workers and communities.²⁹ The Global Methane Pledge — endorsed by over 150 States and the EU — commits signatories to collective reductions in methane emissions of at least 30% by 2030 relative to 2020 levels and deploys regulatory and fiscal levers applicable across energy, agriculture and waste sectors.³⁰ The Beyond Oil and Gas Alliance (BOGA), launched at COP26, provides a further model of intergovernmental coordination on production-side transition, bringing together national and subnational governments committed to managing the phase-out of oil and gas production and elevating supply-side obligations in international climate diplomacy.³¹ The Coalition of Finance Ministers for Climate Action's fossil fuel subsidy workstream (COFFIS) demonstrates that finance ministries can serve as a locus for coordinated fiscal reform, channelling commitments to align national budgets and tax systems with climate objectives through peer review and shared methodologies.³² The Just Energy Transition Partnerships (JETPs) concluded with South Africa, Indonesia, Viet Nam and Senegal are an emerging model for blending multilateral concessional and grant finance, technical assistance, and domestic policy reform commitments in a bespoke transition compact, calibrated to specific national circumstances and degrees of fossil fuel dependence.³³

D. Key Lessons

The foregoing national, regional and sectoral experiences yield some lessons of general applicability:

- **Integrated supply-demand planning:** Roadmaps that address both production-side and demand-side dimensions simultaneously are substantially more effective than those targeting either in isolation, preventing "carbon leakage" and demand displacement.
- **No-new-fossil guardrails:** Legal or policy frameworks that explicitly preclude approval of new fossil fuel projects inconsistent with 1.5°C carbon budgets are essential to prevent infrastructure lock-in and stranded asset risk.
- **Nature-positive co-benefits:** Transition pathways should embed biodiversity safeguards consistent with the Kunming-Montreal Global Biodiversity

²⁹Powering Past Coal Alliance, *Annual Progress Report 2023* (PPCA 2023).

³⁰Global Methane Pledge (launched at COP26, November 2021); see UNEP, *Global Methane Assessment 2021* (UNEP 2021).

³¹Beyond Oil and Gas Alliance (BOGA), *Declaration and Terms of Reference* (launched at COP26, Glasgow, November 2021) <https://beyondoilandgasalliance.org> accessed 31 March 2026.

³²Coalition of Finance Ministers for Climate Action, *Helsinki Principles* (adopted 12 April 2019); *COFFIS Terms of Reference* (2023) <https://www.financeministersforclimate.org> accessed 31 March 2026.

³³Just Energy Transition Partnerships concluded with South Africa (COP26, 2021), Indonesia (G20, 2022), India (COP27, 2022), Viet Nam (COP27, 2022), and Senegal (COP27, 2022).

Framework (GBF),³⁴ ensuring that the renewable energy expansion and land-use changes associated with transition do not themselves generate net biodiversity loss. For example, through the [*Global Initiative for Nature, Grids and Renewables \(GINGR\)*](#), IUCN has been developing metrics and implementation frameworks to support a nature-positive energy transition and to ensure that co-benefits for people and nature are not only optimised, but also monitored and reported transparently. It is also planning to foster a wider coalition on this in the form of a GINGR Challenge that can contribute to the Global Climate Action Agenda. Furthermore, it is important to make the necessary linkages between the Presidency roadmap on transitioning away from fossil fuels with that on halting and reversing deforestation and forest degradation by 2030, to ensure that both roadmaps remain mutually supportive.

- **Independent procedural integrity:** Independent oversight bodies, mandatory stakeholder engagement and accessible judicial review mechanisms significantly enhance both the legitimacy and the durability of transition frameworks.

V. Reflecting Diverse Realities in a Just, Orderly and Equitable Transition

A. The Principle of Differentiation

Equity requires that the "transitioning away" commitment be operationalised in accordance with the principle of CBDR-RC, "in the light of different national circumstances",³⁵ and "taking into account the specific needs and special circumstances of developing country Parties, especially those that are particularly vulnerable to the adverse effects of climate change."³⁶ The ICJ Advisory Opinion confirms that all States owe a binding obligation of conduct based on stringent due diligence to prevent significant harm to the climate system while acknowledging that the specific content of that obligation, and in particular the pace and scope of required transition measures, must be calibrated to each State's contribution to increasing greenhouse gas concentrations in the atmosphere, economic capacity and degree of fossil fuel dependence. The Roadmap must accordingly embed differentiation mechanisms that distinguish meaningfully between: (i) high-emitting producer States, which must act with the greatest urgency and pace; (ii) emerging economy producer States, which require facilitated transition timescales alongside robust international support; and (iii) least developed countries and Small Island Developing States, which bear minimal responsibility and must receive prioritised concessional assistance to manage any economic diversification requirements.

³⁴Kunming-Montreal Global Biodiversity Framework, CBD COP15 Decision 15/4 (19 December 2022) UN Doc CBD/COP/15/INF/2.

³⁵ Paris Agreement (n 5) Preamble; art 4.3.

³⁶ Paris Agreement (n 5) art 4.6.

B. Just Transition Imperatives

A just transition — as called for in GST1 paragraph 28(d) and elaborated in the Paris Agreement Preamble's reference to "a just transition of the workforce and the creation of decent work and quality jobs"³⁷ — imposes substantive obligations extending beyond the mere provision of information or consultation. International human rights law requires that transition processes respect and protect the rights of workers in affected sectors; ensure social protection for communities economically dependent on fossil fuel extraction; observe the free, prior and informed consent (FPIC) of Indigenous Peoples whose territories are affected by transition-related projects;³⁸ and incorporate gender-responsive measures that address the disproportionate vulnerability of women to both climate impacts and transition dislocations. The JETPs, notwithstanding their limitations as non-binding political compacts, illustrate the operational potential of finance-social compacts designed to meet these requirements in specific national contexts.³⁹

C. Orderly International Architecture

The orderly dimension of a "just, orderly and equitable" transition demands that the international financial and governance architecture be restructured to provide the fiscal space and institutional capacity necessary for fossil-dependent developing States to transition without sacrificing sustainable development objectives. This requires: reform of MDB mandates and capital adequacy frameworks to substantially increase concessional climate finance; operationalisation of debt-for-climate/debt-for-nature swap mechanisms and other innovative finance instruments to address sovereign debt burdens; full delivery of the new collective quantified goal (NCQG) commitments;⁴⁰ and meaningful engagement of developing country representatives in the design and governance of the Roadmap itself, consistent with the principles of equity and procedural fairness that underpin the UNFCCC multilateral process.

VI. Concluding Observations

IUCN submits that the COP30 Presidency Roadmap represents a significant opportunity to translate the normative content of the "transitioning away" commitment — as clarified and reinforced by the ICJ Advisory Opinion of July 2025⁴¹ and the ITLOS Advisory Opinion of

³⁷Paris Agreement (n 5) Preamble (referring to 'a just transition of the workforce and the creation of decent work and quality jobs'); Decision 1/CMA.5 (n 1) para 28(d).

³⁸UN Declaration on the Rights of Indigenous Peoples, UNGA Res 61/295 (13 September 2007) UN Doc A/RES/61/295, arts 10, 32; ILO Convention No 169 Concerning Indigenous and Tribal Peoples in Independent Countries (adopted 27 June 1989, entered into force 5 September 1991) 1650 UNTS 383, art 6.

³⁹OECD, *Just Energy Transition Partnerships: Lessons Learnt and Policy Recommendations* (OECD Publishing 2024); see also (n 30).

⁴⁰Paris Agreement (n 5) arts 9–11; UNFCCC Decision 5/CMA.4, *New Collective Quantified Goal on Climate Finance* (COP28, December 2023); Decision 17/CMA.6 on the New Collective Quantified Goal (COP29, November 2024).

⁴¹ ICJ Advisory Opinion (n 3) paras 85, 94.

May 2024⁴² into a coherent implementation framework grounded in the applicable rules of international law. The Roadmap's success will be measured not by the breadth of its aspirational language, but by the specificity of the legal, institutional and financial measures it identifies, the robustness of the accountability architecture it proposes, and the authenticity of the equity safeguards it embeds. IUCN stands ready to provide further technical and legal input to support this process.

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⁴² ITLOS Advisory Opinion (n 4) paras 205, 243.