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Submission of the Durham University Centre for Sustainable Development Law and Policy
JusTN0W Initiative

Durham University
Centre for Sustainable Development Law and Policy

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

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Key messages:

- The Roadmap should strongly promote enablers for Just Transition pathways that are country-specific and that can help overcome the multi-faceted barriers of transitioning away from fossil fuels.
- The Roadmap should develop a coherent understanding of the concept of Just Transition away from fossil fuels across social, legal and economics disciplines.
- Just transition pathways should be sensitive to the specific needs and vulnerabilities of each State, with the Roadmap setting out non-negotiable benchmarks which put States on a shared direction of travel away from fossil fuels.
- Such non-negotiable benchmarks include already agreed on international law obligations and the principles mandated by international courts. These include that Just Transition pathways should be tied to the legally binding new consensus target of 1.5°C. Moreover, States have a duty to directly translate the outcomes of the Global Stocktake into nationally determined contributions (NDCs) and these NDCs must outline national transition plans. NDCs are binding as prescribed qualified unilateral acts in international law.
- Despite entrenched debates about some distributional aspects of Just Transitions, there are certain levers that are shared across States and several stakeholders. This includes the imperative of inter-generational equity, and the need for climate governance that are adequately informed by scientific evidence.
- For some States, continued support for fossil fuels, including through subsidies and granting of exploration and production licences, especially outside time bound Just Transition plans, will engage the law on state responsibility.
- Disproportionate legal safeguards granted to investors under International Investment Agreements, especially under Investor-State Dispute Settlement (ISDS) systems, may constitute a fossil fuel subsidy contrary to international law.
- Removing fossil fuel subsidies through energy market reforms in emerging economies may lead to an increase in economic performance coupled with a decrease in carbon emissions by lessening energy market distortions.
- A Just Transition is not only about the energy mix but includes managing socio economic and workforce impacts. Industrial policy and national development plans should be developed with economic diversification as a priority while promoting fossil

fuel phase down arrangements particularly in fossil dependent economies with the CBDR RC and equity as guiding principles.

- The Roadmap should recognise digital governance as a core enabler of evidence-based transition, including through interoperable climate data systems, clear legal frameworks for data access and use, and equitable capacity for AI-assisted planning in line with CBDR and equity principles.

Introduction

1. We appreciate the opportunity to make this submission on the COP30 Roadmap on Transitioning away from fossil fuels as a non-Party organisation with observer status.

2. This input in based on the multidisciplinary research agenda and policy engagements of the Just Transition to a Net Zero World (JusTN0W) research initiative of the Durham Centre for Sustainable Development Law and Policy (CSDLP), Durham University, UK.

3. Based on our combined expertise, our team has chosen to address the following issues listed in the call for inputs: including governance frameworks, economic and financial systemic risks, the supply-side perspective with a special emphasis on critical minerals, policy instruments and market mechanisms and technological solutions and economic diversification.

4. In our view, the Roadmap and the Just Transition Mechanism should approach Just Transitions away from fossil fuels holistically but urgently and with the greatest possible determination. The World Meteorological Organisation report of The State of the Global Climate 2025 shows that the increase of CO2 concentrations in 2024 was the largest annual increase since modern measurements began in 1957. It is driven by continued CO2 emissions, increased emissions from forest fires and reduced effectiveness of terrestrial and ocean sinks in 2024. Additionally, concentrations of methane (CH4) and nitrous oxide (N2O) also reached record levels in 2024. This leaves future generations with the immense burden of making emissions reductions while adapting to an increasingly changing climate. Transitioning away from fossil fuels is the clear imperative to which States agreed in the Decision 1/CMA.5, the outcome of the Global Stocktake.

5. Academic research can make important contributions to the development of Just Transition Pathways which are complex and multi-layered. Just Transitions emerge as an essentially interdisciplinarity challenge, which must be studied, measured and interpreted through various disciplinary methodologies. Yet this deeply engrained interdisciplinarity, also makes the conceptualisation of Just Transitions susceptible to competing, potentially incompatible, interpretations and underlying discipline-specific assumptions. It is vital, therefore, that the Roadmap guards against proposing diametrically divergent contents to the meaning of Just Transitions, and instead, fosters a shared vision and understanding of the imperative of transitioning away from fossil fuels in a just, orderly and equitable manner.

Inputs regarding the questionnaire

6. Realizing Just Transitions away from fossil fuels comes up against multi-faceted barriers, arising from a number of factors as detailed below. An effective international framework for Just Transitions should, therefore, promote a range of enablers to counter these obstacles.

(a) What are the most critical barriers — whether physical, economic, financial, institutional, technological or social— preventing a transition away from fossil fuels?

Social barriers:

7. The narrative of sustainable development through fossil fuel consumption remains dominant globally. Where funding for change becomes even more scarce, an alternative perspective of development through the promotion of renewable energy moves to the periphery. There is a lack of leadership especially from some mature economies to demonstrate that fossil-fuel free development is possible.

8. The public and policy discourse in the current geo-political context focusses on energy security in the context of fossil fuels. This discourse must shift towards a conversation about the causes of conflict, highlighting the extent to which fossil fuel dependency sits at the very heart of these conflicts and exacerbates their impacts. Energy security and climate protection can and must be achieved simultaneously.

Digital Governance as a legal, technical, and institutional barrier for evidence-based transition:

9. The International Court of Justice (ICJ), in its Advisory Opinion on the Obligations of States in Respect of Climate Change (2025), articulated a due diligence standard that includes the obligation to actively pursue the scientific information necessary to assess the probability and seriousness of harm to the climate system (hereinafter referred to as AO), (AO, §§275, 278). The Court further specified that the higher the probability and seriousness of possible harm, the more demanding the required standard of conduct (AO, §275). 10. The rapid development of artificial intelligence tools for climate scenario modelling, energy system optimisation, and policy simulation creates both opportunity and structural risk. Access to the data underpinning these tools and the legal frameworks governing such access also shapes these dynamics (Chang and He, 2025). While AI offers transformative potential for accelerating evidence-based transition planning, these capabilities remain largely concentrated in high-income economies with advanced digital infrastructure (IPCC AR6 WGIII, 2022). Where only a subset of actors can access climate data or generate the modelling frameworks that define which transition pathways are considered technically feasible, those actors exercise disproportionate epistemic authority over the collective content of global climate action.

Economic barriers to the transition:

10. The transition to net zero takes place within a complex, path-dependent economic system (Dumas and Andres, 2026). Technological transformation tends to create both winners and losers (Frey, 2019; Zenghelis *et al*., 2018), and the transition to net zero is no exception. Phasing out fossil fuels entails large-scale destruction of economic value (Pfeiffer *et al*., 2018; Van der Ploeg and Rezai, 2020), with estimated lost profits in oil and gas exceeding $1 trillion (Semieniuk *et al*., 2022). These adjustment costs extend beyond firms to workers, regions, and even countries dependent on legacy fossil fuel activities. Because capital, skills, and regional capabilities are imperfectly mobile across sectors, those affected often face significant barriers to transitioning into alternative economic activities (Andres *et al*., 2023). These distributional

consequences contribute to political resistance to climate policies at multiple levels of civil society and government.

11. It is worth noting several other sources of path dependence in technological systems, particularly one as interconnected and dependent on long-lived infrastructure as the energy system (Seto et al, 2016). Sources of technological lock-in to the legacy system include a host of network effects, such as through long-lived infrastructure and complementary technologies (including pipelines for transporting oil and gas; gas boilers; gas power stations). These add to the set of assets at risk of stranding and increase the cost of scaling up new technologies, which often require investments in complementary infrastructure (such as smart grids or electronic charging stations).

12. Behavioural lock-in also plays a role: consumers can be reluctant to adopt new technologies, especially if switching costs are high (whether cognitively or financially). The more similar the new technology, the easier it will be to adopt it.

13. Economists have highlighted that innovation efforts can benefit from increasing returns to knowledge in the incumbent technology, creating a need for R&D support to clean technology in addition to carbon pricing (Acemoglu *et al*., 2012).

14. Perhaps most importantly, studies of historical energy transitions show that these have always been additive, rather than substitutive: the addition of a new energy source usually leads to a large increase in overall energy consumption (Fouquet, 2016; York and Bell, 2019). We observe the same pattern now, with both fossil fuels and renewables expanding in absolute terms even as the share of renewables in the overall energy mix increases. Given the large number of people who still lack access to electricity, particularly in Sub-Saharan Africa, expanding overall energy supply is essential to improving livelihoods (Adeyemi, 2024). This implies that low carbon energy sources need to expand at a rate fast enough to displace the incumbent fossil fuels, whilst also increasing supply (Dumas and Andres, 2026).

15. Moreover, scaling up renewable energy sources implies dramatic increases in demand for the critical minerals used in associated equipment. In addition to concerns about environmental sustainability and labour standards, this has the potential to create supply-chain bottlenecks, as well as geopolitical tensions of a similar nature to those abundantly familiar from the oil and gas industry. It also brings to the forefront the pressing question of how resource exporters can achieve economic diversification and avoid a new kind of resource curse; a question to which the economics literature has yet to provide a conclusive answer (Dumas and Andres, 2026).

16. Finally, in developing and emerging economies, energy policies are primarily advocated to provide energy security and accessibility for all. Yet, they often sacrifice economic efficiency and environmental sustainability and undermine defossilisation and decarbonisation pathways. There are economic studies furnishing evidence in favour of energy policies that eliminates fossil fuel subsidies to promote decarbonisation and economic prosperity (Amir *et al*., 2022). Energy security for vulnerable groups can be realised by income support instead of capping energy prices, with public funds sourced from carbon tax revenues and savings from removing companies' fossil fuel subsidies.

(b) What potential levers, whether economic, financial, institutional, social or technological, exist for accelerating the implementation of the transitioning away commitment?

Legal levers:

17. The Roadmap on transitioning away from fossil fuels should be based on, and be consistent with, the emerging legal benchmarks under international law with regard to state obligations relevant to fossil fuels. These benchmarks have been solidified through a series of authoritative decisions of international courts in respect of the current status of international law, including the ICJ's Advisory Opinion on state obligations with respect to climate change (hereinafter referred to as AO), the Advisory Opinion of ITLOS, the Advisory Opinion on human rights and climate change by the Inter-American Court of Human Rights as well as the climate change related decisions of the European Court of Human Rights.

18. These international law obligations should be seen as setting out some minimum requirements and a shared direction of travel for States with different capacities and vulnerabilities towards transitioning away from fossil fuels.

19. States are not entirely free to determine the content of their NDCs. These NDCs must set out transition plans in a country-specific context. The ICJ has recognised that the level of ambition to be reflected in a party's NDC is not entirely discretionary (AO, §242). Parties are indeed obliged to exercise due diligence in defining the content of their NDCs to ensure that taken together, these NDCs are capable of achieving he temperature goal of limiting warming to 1.5°C above pre-industrial levels and to stabilise GHG concentrations in the atmosphere to prevent dangerous interference with the climate system (AO, §245) This entails transition planning that enables the party to achieve its ambitions target. NDCs are prescribed by the Paris Agreement, and they are qualitatively determined by the interpretation of the Paris Agreement and the outcome of the GST, and as such, constitute prescribed qualified unilateral acts. (Minnerop, 2025, a)

20. There is a binding legal obligation for States to design NDCs with the highest possible ambition under the Paris Agreement. (There are a number of legal and factual indicators that should inform the assessment whether an NDC meets the highest possible ambition (Voigt et al, 2025). More precisely, each party needs to comprehensively assess all the mitigation options available to it and the mitigation potential associated with them, taking into account all relevant mitigation information and dimensions to comply with the requirement of the highest possible ambition. Moreover, the highest possible ambition requires states to set out clear pathways with short-, medium-, and long-term GHG reduction measures, as the more the ambition is shifted towards the future, the less likely it is that action actually follows. Finally, the degree of care required of States in complying with their obligations must be proportional to the magnitude and foreseeability of the harm involved.

(i) Intergenerational equity

21. The Roadmap should first and foremost promote finding an "equitable solution as appropriate from the applicable law" (AO, §153) to the problem of designing pathways to a Just Transition. In view of the ICJ, intergenerational equity is a manifestation of equity in the general sense, and it constitutes a guiding principle for the interpretation and application of binding obligations. More concretely, "(d)ue regard for the interests of future generations and

the long-term implications of conduct are equitable considerations that need to be taken into account where States contemplate, decide on and implement policies and measures in fulfilment of their obligations under the relevant treaties and customary international law." (AO, §157). Inter-generational burden-sharing also arises as a human rights obligation, requiring States not to pose excessive burdens through climate change on future generations (*Verein KlimaSeniorinnen Schweiz and Others v Switzerland*, §420).

22. Intergenerational equity also requires intergenerational preparedness, whereby the present generation prepares future generations for significant climate change, with increasingly more frequent and severe adverse impacts. Even more drastic changes in human systems and ecosystems are inevitable if temperatures rise higher, as implied by current emissions trajectories, and every increment of temperature increase matters. The idea of intergenerational preparedness suggests that States have a duty to observe the effect of climate targets that they set today, for future generations. Targets defined today, in countries' NDCs, haven an advance interference like effect with respect to the rights of future generations. States also have a duty to adopt legal frameworks and policies that dynamically consider changing conditions of life in the light of a foreseeable deterioration and should prioritise measures that reduce vulnerabilities and create resilience across all policy areas, including through interim targets. (Minnerop, 2024).

23. Accordingly, in sum, States' obligations relevant to the Just Transition away from fossil fuels should be informed by intergenerational equity.

(ii) The new consensus target of 1.5°C

24. As requested by the Paris Agreement, States must be informed by the outcome of the Global Stocktake in the development of their new NDCs. This includes alignment of individual NDCs to the 1.5 temperature target, the new consensus target that is supported by COP and CMA decisions and the science. This entails that States include all sectors and detail sector targets in their NDC. Specifically, the Methane Pledge requires that States set out how they will reduce their Methane emissions from fossil fuel infrastructure. More concretely, States must provide emission reduction targets for the oil and gas sector and develop their Long-term Low Emissions Development Strategies (LT-LEDS) in the light of the new NDC 3.0.

25. Moreover, a strong scientific consensus, translated into a legal consensus as under the Paris Agreement ad recognised by the ICJ as such, places limitations on the discretion of States with regard to the means of protecting human rights. (Minnerop, 2023).

(iii) CBDR

26. The principle of common but differentiated responsibilities and respective capabilities is a core guiding principle for the implementation of the climate change treaties. The Roadmap should reflect the words of the ICJ acknowledging the need "to distribute equitably the burdens of the obligations in respect of climate change, taking into account, inter alia, States' historical and current contributions to cumulative GHG emissions, and their different current capabilities and national circumstances, including their economic and social development." (AO, §148).

(iv) Human rights obligations

27. It has become undisputable in light of proliferating domestic, regional and international judicial practice in every major jurisdictions that adverse climate impacts infringe upon a wide spectrum of human rights (Verein KlimaSeniorinnen Schweiz and Others v Switzerland, nter-American Court of Human Rights, Advisory Opinion OC-32/25 on Climate Emergency and Human Rights). States human rights obligations should inform the design and implementation of Just Transition policies. In its 2025 advisory opinion on the obligations of States with respect to climate change, the ICJ held that the core UN human rights treaties and customary human rights law form "part of the most directly relevant applicable law" on climate change, and that the adverse effects of climate change can significantly impair the enjoyment of rights including life, health, food, water, housing and the rights of women, children and Indigenous peoples (AO, §§145, 372–386). It is also well established that States have a range of positive obligations under human rights law to protect individuals from severe climate impacts by taking mitigation and adaptation measures. (*Verein KlimaSeniorinnen Schweiz and Others v Switzerland*, §550)

28. The UN Special Rapporteur on human rights and climate change warns furthermore that the energy transition should not replicate the same patterns of human rights violations that accompanied the fossil fuel-based economy. (Morgera, 2026). The Roadmap should clearly guard against such possibilities.

(v) The customary duty to prevent significant harm

29. Binding duties of States include the customary obligation to prevent significant harm to the climate system, which must be protected for present and future generations. (AO, §173). This entails an obligation to regulate private and public entities that engage in GHG emissions on their territories. (AO, §282). Regulatory mitigation mechanisms that are designed to achieve the deep, rapid, and sustained reductions of GHG emissions are necessary for the prevention of significant harm to the climate system. (AO, §282)

30. This duty arises as a result of the general risk of significant harm to which every State contributes, although in markedly different ways, through their activities undertaken within their jurisdiction or control. (AO, §279). Emphatically, the duty to prevent applies to all States even though the duty of care expected from them may vary according to their capabilities and circumstances. Therefore, States are obliged to take appropriate action and have a holistic view of direct and end-user GHG emissions arising from fossil fuel development within their borders (Adeyemi, 2026).

31. Care for future generations must be integrated in the obligation to prevent significant harm. This obligation includes taking into account the risks which current activities might pose in the future, including in the long term. (AO, §275). Importantly, the higher the probability and the seriousness of possible harm, the more demanding the required standard of conduct. (AO, §275)

32. There is ample scientific evidence available for States that substantiate the causes and likely impacts of anthropogenic climate change. This body of robust evidence should inform States modelling and domestic decarbonisation policies.

(vi) The imperative to collect scientific data and to follow best available science

33. Due diligence also requires States to actively pursue the scientific information necessary for them to assess the probability and seriousness of harm. (AO, §283) The reports of the IPCC carry special weight and relevance as they constitute the best available science (AO, §278). The UNFCCC and the Paris Agreement stipulate that States use the best available science for the implementation of their obligation.

34. There are important pieces of robust scientific evidence relevant to the natural and social science knowledge around Just Transition away from fossil fuels which can be found outside the scope of IPCC reports. Evidence is often tied to local and national circumstances. Domestic courts have already been treating reports of domestic climate change advisory bodies as source of reliable proofs in the context of appraising climate policies (Sulyok, 2025).

(vii) International law obligations around fossil fuels

35. Ample scientific evidence suggests that authorising new fossil fuel projects is incompatible with meeting the consensus target of the 1.5C. This body of emerging evidence should be interpreted in the context of judicial findings articulating an obligation for States to assess the entirety of impacts, including those of the downstream combustion emissions, caused by fossil fuel projects (AO, §298) and a quantification of the GHG emissions anticipated to be produced (*Greenpeace Nordic v Norway*, §319). In a similar vein, States must assess the possible cumulative effects of their acts and the planned activities under their jurisdiction or control. (AO, §276).

36. The ICJ also expressly recognised that even individual conduct leading to emissions may give rise to the obligation to prevent significant transboundary harm, even if such activity is environmentally insignificant in isolation. (AO, §277). The Court also pointed out that change "a failure of a State to take appropriate action to protect the climate system from GHG emissions — including through fossil fuel production, fossil fuel consumption, the granting of fossil fuel exploration licences or the provision of fossil fuel subsidies — may constitute an internationally wrongful act which is attributable to that State." (AO, §427).

37. Relatedly, the UK's policy intervention through the Supplementary Guidance is instructive as it adopts a wholesale global emissions reduction strategy promoting the consideration of the cumulative effects of a domestic fossil fuel project within the UK in comparison with other existing and future projects, in a global context. This approach highlights the importance of taking into account the impact of existing and planned domestic and foreign fossil fuel projects against global emissions reduction action (Adeyemi, 2026).

Digital Governance as a legal, technical and institutional lever for evidence-based transition:

38. First, international cooperation should prioritise the development of interoperable climate data platforms, including national greenhouse gas inventory systems, sector-specific emissions databases with special attention to methane from fossil fuel supply chains under the Global Methane Pledge, and open modelling environments for energy system planning (International

Energy Agency, 2024). The institutional architecture for such cooperation already exists in embryonic form through the NDC Partnership, the CBIT under the GEF, and UNFCCC capacity-building mechanisms (Oh, 2022). However, the mandates of these bodies should be expanded beyond data collection and submission to encompass the legal and regulatory infrastructure for data governance: access rights, sharing protocols, open licensing frameworks, and interoperability standards (Campbell *et al*., 2024). Without such a legal infrastructure, the data generated through international support efforts remains fragmented and difficult to repurpose across different national contexts (Verhulst and Young, 2022).

39. Second, the international community should develop normative standards, whether binding or in the form of authoritative soft-law guidance, that govern the collection, access, and use of climate-relevant data, including by private actors. The absence of clear legal frameworks in this space represents a structural governance failure (Brett, 2022). Drawing on developments at the frontier of digital governance, including but not limited to the EU AI Act's transparency and accountability provisions (Regulation (EU) 2024/1689), emerging liability frameworks for automated data collection (Chang and He, 2025), and the growing body of open science policy in international research governance (UNESCO, 2021), the UNFCCC process should consider developing designated "climate data commons" frameworks. Such frameworks would guarantee access to climate data necessary for public-interest transition planning, establish accountability for unjustified obstruction of climate data collection, and ensure that the legal systems of Parties do not arbitrarily impede the data practices on which ETF compliance and the due diligence obligations depend (AO, §§275, 278). Operationalising common but differentiated responsibilities in this context implies an obligation on technologically advanced States to actively enable, and not obstruct, the data practices of developing nations.

40. Third, capacity building for AI-assisted transition planning should be integrated as an explicit element of the Paris Agreement's technology transfer and capacity-building architecture. Article 10 of the Paris Agreement establishes a technology development and transfer mechanism aimed at improving adaptive and mitigative capacity. This provision should be interpreted and operationalised to encompass not only physical clean energy hardware but also the digital and analytical tools that underpin evidence-based transition planning (Machen, 2025). Accompanying this must be investment in regulatory capacity: policymakers in developing countries require not only access to these tools but the legal and institutional frameworks to govern their deployment, verify their outputs, and hold AI model developers accountable for transparency in model assumptions and methodologies (Regulation (EU) 2024/1689, Arts. 9, 13, 17). Embedding explicit provisions for equitable access to AI-assisted climate planning tools within the Roadmap, along with governance standards that prevent such tools from reproducing existing analytical inequalities (Mathur and Chamuah, 2026), would give practical institutional effect to both the principle of CBDR and the procedural dimension of Just Transition (Heffron and McCauley, 2018).

Economic levers for transition:

41. There are reasons to be hopeful. Dramatic cost reductions in key technologies such as wind, solar, and electrolysers have vastly exceeded even the most optimistic estimates and made those technologies competitive with fossil fuels in many contexts. Way et al (2022) provide evidence to suggest that technological progress in renewables is fundamentally different to fossil fuels, whose prices, though prone to fluctuations, have essentially remained stable since the 19th century. Moreover, advances in artificial intelligence (AI) appear to be more readily

integrated in low carbon technologies than fossil fuels, potentially lessening the path dependence favouring the legacy system (Andres *et al*., 2022).

42. Policy support has been successful in aiding the scale-up and widespread adoption of low carbon technologies, with solar photovoltaics being the most striking success story. That said, evidence suggests that solar benefitted from its highly modular structure, which implies a lower need for early-stage investments in complementary infrastructure. Moreover, general policies – such as carbon prices – appear to favour more mature technologies, while supporting early-stage innovation requires more targeted policy (Dumas and Andres, 2026). Given the many remaining technological challenges – such as decarbonising hard-to-abate sectors, including steel and cement, as well as reducing reliance on critical minerals with vulnerable supply chains through innovation across the value chain (Dugoua and Noailly, 2025) – continued support for a portfolio of low carbon technologies is crucial. Moreover, given the historically additive nature of energy transition, supporting low carbon technologies may not be enough on its own – explicit phase-out policies for fossil fuels are likely needed (Dumas and Andres, 2026).

43. The potential disruption from the transition to those reliant on the fossil fuel industry, such as workers and regions specialised in oil, gas or coal extraction, also creates a need for policy: both policy supporting workers in reskilling, and industrial policy to help affected regions and countries develop more climate-compatible economic capabilities (Andres *et al*., 2023). Avoiding harm to vulnerable populations is key to making the transition a just one.

(c) What country, regional or sector roadmap experiences, best practices, and lessons learned can be shared?

44. The EU Social Climate Fund (SCF) represents a major institutional innovation designed to mitigate the distributive consequences of extending carbon pricing to the buildings and road-transport sectors under the new ETS2 system. The SCF provides protection against expected increases in household heating and mobility costs as fuel suppliers begin purchasing emissions allowances and pass these costs on to consumers. The fund allocates €86.7 billion between 2026 and 2032, financed through ETS2 revenues and 25% mandatory national co-financing, with resources distributed more heavily toward lower-income Member States where energy and transport poverty are more prevalent.

45. The SCF's design integrates both immediate relief and long-term structural transformation. It targets vulnerable households and individuals and enterprises heavily burdened by energy costs. Structural investments constitute the core of the SCF's approach, including building renovations, insulation upgrades, replacement of outdated heating and cooling systems, and deployment of renewable energy technologies such as rooftop solar. These interventions reduce reliance on fossil fuels and directly address energy poverty, while parallel investments in zero-emission mobility and shared transport systems reduce exposure to rising fuel prices. To access funding, Member States must submit National Social Climate Plans to the European Commission, outlining targeted measures and governance mechanisms to ensure alignment with the CSF scope. The SCF's expected impacts include reducing energy and transport poverty, leveraging the distributional potential of ETS2 revenues, and facilitating socially inclusive progress toward EU climate-neutrality goals.

(d) How can a just, orderly and equitable transition best reflect the diverse realities of countries at different stages of development and with different degrees of dependence on fossil fuels?

46. While there should country specific Just Transition pathways, there must be an overarching and shared Roadmap and non-negotiable ground rules that set a shared direction of travel for the international community.

47. Phase down ad phase out obligations should be managed through graduated and context specific scenarios. It is important to develop appropriate frameworks and intervention mechanisms to reflect equity and CBDR-RC principles. The pace and practicality of the energy transition for countries in different stages of development ought to take account of justice, equity considerations, development priorities and national circumstances.

48. Essentially, a fair transition arrangement will recognise different needs of countries within the imperative that is set by the scientific evidence and the shared international legal framework. The current geo-political situation demonstrates that energy security cannot be achieved with continued fossil fuel dependence. Continued fossil fuel dependence increases the vulnerability of all States in their rules as providers of energy access as suppliers of energy and of communities affected by the impact of climate change.

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