

Comment for COP30 Presidency's Fossil Fuel Transition Roadmap: **No More Sacrifice Zones: Build Energy Transition With Communities, Not On Them**

Community-Designed Solutions Outperform Externally Imposed Transitions



Health In Harmony

Seeding Change with Rainforest Communities.

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Health In Harmony (HIH) is a global organization with independent affiliates working in and beyond all of the earth's climate-critical rainforest basins. We work alongside Indigenous and forest-dependent communities in the Brazilian Amazon, Indonesian Sundaland and Australasia, Madagascar's eastern rainforests, Panama's Darién rainforest, and the Congo Basin — communities that have proven, in peer-reviewed research, that locally designed and community-led solutions consistently deliver superior conservation outcomes while simultaneously improving health, livelihoods, and rights.

We submit these comments in response to the COP30 Presidency's invitation on the Roadmap for Transitioning Away from Fossil Fuels. Our core argument is this: no transition is just without support from the people who have paid the highest price for fossil fuel extraction. Our experience demonstrates that *locally-designed* solutions consistently outperform externally imposed programs — delivering faster climate gains alongside improvements in health, livelihoods, and rights. That principle applies as much to the fossil fuel transition as it does to forest conservation.

Our Core Recommendations

Based on almost nearly two decades of evidence across five countries and three continents, we urge the Presidency to ensure that the roadmap:

- Imposes an immediate moratorium on new extraction licenses on Indigenous territories as the roadmap's first implementation step;
- Requires Free, Prior, and Informed Consent (FPIC) as a non-waivable condition for all transition-related infrastructure on or adjacent to Indigenous territories — including critical mineral mines, transmission lines, wind and solar installations, and hydropower projects;
- Sets a 25% direct financing floor for Indigenous and locally-led energy solutions within a Just Transition Mechanism, with funding direct to communities rather than through implementing intermediaries;
- Creates a dedicated track for community-scale, off-grid clean energy access for forest-adjacent and Indigenous communities, funded through direct grants and designed by communities themselves;
- Mandates inclusion of health system strengthening in nationally determined fossil fuel transition plans;
- Creates a dedicated mechanism for funding locally designed livelihood transitions across the full spectrum of fossil fuel dependence, from subsistence-level charcoal and firewood economies to retraining petro engineers for new careers in wind and solar;
- Establishes a dedicated reparations and environmental remediation fund for Indigenous and local communities already impacted by fossil fuel extraction, with direct community access and community-designed use of proceeds.

(a) Critical Barriers to Transitioning Away from Fossil Fuels

Barrier 1: The problem starts on Indigenous lands. The roadmap must not repeat this omission.

The most fundamental barrier is one that rarely appears in transition frameworks: fossil fuel extraction is already happening *inside* Indigenous territories, without consent, and without remedy. Governments and oil companies demarcate "oil and gas blocks" — defined areas of territory licensed by national governments for

private or state company exploration and extraction — with little or no consultation with the communities whose lands fall within those boundaries. Over 25 million hectares of Indigenous territories in the Amazon are now inside such blocks designated for production or exploration, and more than 12 million people live in over 10,000 villages now in oil and gas blocks across Amazonia.¹

This is not solely an Amazon problem. In Indonesia, more than 99,000 populated places are located in oil and gas blocks, with over 3,000 in mining concessions — both overlap areas with high concentrations of Indigenous and forest-based peoples. 53% of natural forests are vulnerable to extractive concessions.² Across eight Amazon countries, 81 awarded oil and gas blocks overlap with 441 ancestral lands, and 38 more affect 61 protected natural areas. Additionally, 114 blocks under study or available for bidding are located on Indigenous territories.³ In Ecuador alone, oil and gas blocks overlap with 65% of Indigenous territories, covering 4.5 million hectares. More than 4,600 oil spills and contamination incidents occurred between 2006 and 2022, with over 530 occurring directly in Indigenous territories.⁴

Two statements define the stakes. From the community of nations seeking to phase out fossil fuels:

"Governments must agree to prioritise ending expansion and phasing out extraction in areas of Indigenous Sovereignty and other traditional communities, and of high biodiversity, first."⁵ — Fossil Fuel Non-Proliferation Treaty Initiative, COP30, November 2025

And from the communities living under extraction:

"Not a single drop of Amazonian oil has been extracted with the consent of Indigenous Peoples."⁶ — Fany Kuiru, General Coordinator, COICA (Coordinating Body of Indigenous Organizations of the Amazon Basin), 2025

Any transition roadmap that does not begin with an immediate halt to new extraction on Indigenous lands is not a just transition — it is a managed continuation of injustice. Indigenous peoples, the most effective guardians of the forest, are calling for their territories, too-often treated as "sacrifice zones", to be declared instead "No-Go Zones" for extractive industries.^{7 8}

Ask: The roadmap must include an immediate moratorium on new extraction licenses on Indigenous territories as its first implementation step — not as a later equity footnote. This aligns with language already in the Fossil Fuel Non-Proliferation Treaty proposal, which calls for governments to prioritize ending expansion and phasing out extraction in areas of Indigenous Sovereignty first.⁹ Current extraction projects must be wound down, with appropriate compensation paid to communities for damage born, as well as alternative restorative livelihoods.

¹One Earth, "Oil and Gas Expansion is a Massive Threat to the Amazon and Congo Forests and Communities," December 2022. <https://www.oneearth.org/oil-and-gas-expansion-is-massive-threat-to-amazon-and-congo-forests-and-communities/>

²Earth Insight / Global Forest Watch, "Three Basins Threat Report: Fossil Fuel, Mining, and Industrial Expansion Threats to Forests and Communities." <https://earth-insight.org/report/three-basins-report/>

³InfoAmazonia / Climate Home News, "The Amazon Rainforest Emerges as the New Global Oil Frontier," April 2025. <https://infoamazonia.org/en/2025/04/01/the-amazon-rainforest-emerges-as-the-new-global-oil-frontier/>

⁴Stand.Earth: "Major Amazon Oil and Gas Financiers Fail to Protect the Rainforest," March 2025.

<https://stand.earth/press-releases/environmental-and-social-policies-of-major-amazon-oil-and-gas-financiers-fail-to-protect-the-rainforest-and-its-peoples/>

⁵Fossil Fuel Non-Proliferation Treaty Initiative, COP30 Statement, November 2025. <https://fossilfuel treaty.org/cop30>

⁶Stand.Earth: "Major Amazon Oil and Gas Financiers Fail to Protect the Rainforest," March 2025.

⁷Global Alliance of Territorial Communities (GATC) and Earth Insight, "Turning Indigenous Territories From 'Sacrifice' Zones to Thriving Forest Ecosystems," *IPS News*, November 10, 2025. <https://earth-insight.org/ips-11-10-25/>

⁸Amazon Watch, "Amazon Free from Extraction: Ending Oil, Gas, Mining, and Agribusiness on Indigenous Lands," press release from COP30, November 13, 2025. <https://amazonwatch.org/news/2025/1113-amazon-free-from-extraction-ending-oil-gas-mining-and-agribusiness-on-indigenous-lands>

⁹Fossil Fuel Non-Proliferation Treaty Initiative, COP30 Statement, November 2025. <https://fossilfuel treaty.org/cop30>

Barrier 2: The transition replicates extractive logic — the “green colonialism” barrier

The clean energy transition requires lithium, cobalt, copper, and nickel — the overwhelming majority of which sit under Indigenous and forest-community lands.¹⁰ A fossil fuels roadmap that does not address this threat is setting up the same dispossession cycle under a green flag. This is not merely a justice concern; it is a credibility and implementation risk for the roadmap itself. Communities that have watched fossil extraction destroy their lands will not trust a transition that deploys the same model under different branding.

Free, Prior, and Informed Consent (FPIC) is an established right under international law. It is not being honored in fossil fuel extraction, and there is as yet no binding mechanism to ensure it in transition infrastructure.

Ask: Free, Prior, and Informed Consent (FPIC) must be a legally non-waivable condition for ALL transition-related infrastructure on or adjacent to Indigenous territories — including critical mineral mines, transmission lines, wind and solar installations, and hydropower projects. The roadmap must explicitly state that transitioning away from fossil fuels cannot mean transferring the same extractive logic to a new class of resources.

(b) Levers for Accelerating Implementation

Lever 1: Direct energy access for forest-adjacent communities

Communities under energy poverty rely on diesel generators, charcoal, and in some cases clear forest land for fuel. The IEA estimates that demand for firewood and charcoal results in the loss of forests the size of Ireland every year, with the worst effects concentrated in east and southern Africa.¹¹ This dynamic is not incidental to the climate crisis — it is a direct product of energy poverty in forest communities.

The fossil fuels transition roadmap, as currently framed, focuses almost entirely on national energy systems and large-scale infrastructure. This misses the communities whose energy poverty most directly impacts the forests that form the backbone of global climate stability.

Clean energy access for forest-dependent communities is a direct climate lever. Off-grid solar and small biogas systems at the community scale can simultaneously reduce fossil fuel dependence, reduce deforestation pressure, and improve health outcomes. Governments in Sub-Saharan Africa are beginning to recognize this: Nigeria's National Clean Cooking Policy includes a target for 20% household adoption of electric cooking by 2030, and the Minister of Environment has committed to implementing the policy.¹² This transition, however, will not reach forest-adjacent communities through centralized infrastructure or multilateral programs. It requires direct grants, designed by communities, not imposed through intermediary agencies.

Ask: The roadmap must include a dedicated track for community-scale, off-grid clean energy access for forest-adjacent and Indigenous communities. Funding for this track must flow directly to communities — not through multiple layers of implementing agencies. We call for a minimum 25% direct financing floor for Indigenous and locally-led energy solutions within the new Just Transition Mechanism established at COP30.¹³

¹⁰ Owen, J.R. and Kemp, D. et al., "Energy transition minerals and their intersection with land-connected peoples," *Nature Sustainability*, December 2022. <https://www.nature.com/articles/s41893-022-00994-6>

¹¹International Energy Agency, "A Vision for Clean Cooking Access for All," 2023. <https://www.iea.org/reports/a-vision-for-clean-cooking-access-for-all/executive-summary>

¹²Lawal, Balarabe (Minister of Environment, Federal Republic of Nigeria). Quoted in: "Govt Commits to Clean Cooking Energy by 2030," *The Guardian Nigeria*, October 27, 2025. <https://guardian.ng/news/nigeria/national/govt-commits-to-clean-cooking-energy-by-2030/>

¹³Center for Biological Diversity, "COP30 Establishes Landmark Just Transition Plan, Flames Out on Fossil Fuel Phaseout," November 2025. <https://biologicaldiversity.org/w/news/press-releases/cop30-establishes-landmark-just-transition-plan-flames-out-on-fossil-fuel-phaseout-2025-11-22/>

Lever 2: Health system integration

HIH's almost deep pool of peer-reviewed evidence from around the world demonstrates that meeting health needs is one of the single most effective levers for reducing environmental degradation. When communities have access to healthcare, the economic pressure to log, clear, or mine is fundamentally altered. A transition roadmap that addresses only energy infrastructure while ignoring the health systems that determine whether communities can afford not to degrade their environments is operating with one hand tied.

Integrating health system strengthening into fossil fuel transition strategies — including clean energy for clinics, reduced diesel reliance in health facilities, and preventive health investment alongside livelihood transitions — is both a justice imperative and a practical accelerator. The phasing-out of fossil fuels thus creates an opportunity to not only reach the Paris Agreement temperature goals, but also vastly improve health at the same time. The health benefits of meeting the Paris Agreement targets could save millions of lives and trillions of dollars in health-care costs by midcentury.¹⁴

Ask: Mandate the integration of health system strengthening into nationally determined fossil fuel transition plans, particularly in forest-adjacent and Indigenous communities. This includes clean energy for health facilities, reduced diesel dependence in health delivery, and investment in preventive health alongside livelihood transition programs.

Lever 3: Livelihood transitions across the full spectrum of fossil fuel dependence

A just transition must account for the full range of people whose livelihoods depend on fossil fuels — from charcoal gatherers in Haiti and subsistence firewood collectors across sub-Saharan Africa and Southeast Asia, to artisanal fuel traders in forest-adjacent communities, to skilled workers in Nigeria's and Angola's oil and gas sectors earning wages that represent the primary economic base for their families and communities.

These groups face entirely different transition challenges. A charcoal gatherer in Haiti needs a viable alternative source of household income and access to clean cooking options at a price point that works without subsidy. A trained petroleum engineer in Port Harcourt or Luanda needs a skills recognition pathway and a transition economy that can employ them as similarly compensated solar installers or wind engineers. Neither country or community will be served by a one-size-fits-all framework.

Communities resist fossil fuel phaseout when it threatens income and has no credible alternative to offer. This resistance is rational. Any roadmap that does not address it will fail not because of bad faith, but because it is asking people to personally and immediately bear considerable and disproportionate costs for a global transition for which they receive few immediate benefits.

Ask: The roadmap must include a dedicated mechanism for funding locally designed livelihood transitions across the full spectrum of fossil fuel dependence, from subsistence-level charcoal and firewood economies to industrial extraction sectors. These transitions must be designed by affected communities and workers, not imposed from outside, and must be funded at scale before phaseout timelines are set.

¹⁴ World Health Organization, "Health benefits far outweigh the costs of meeting climate change goals," December 5, 2018. <https://www.who.int/news/item/05-12-2018-health-benefits-far-outweigh-the-costs-of-meeting-climate-change-goals>

(c) Best Practices and Lessons Learned

The Health In Harmony model: evidence from three continents

Health In Harmony and its independent affiliates — including Alam Sehat Lestari (ASRI) in Indonesia, SAMA in Brazil, and FAMI in Madagascar — have generated a body of evidence spanning almost 20 years showing that locally designed, community-led solutions consistently outperform externally imposed programs across every metric: conservation outcomes, health outcomes, cost-effectiveness, and durability.

In Indonesian Borneo, a ten-year Stanford University analysis published in the *Proceedings of the National Academy of Sciences* demonstrated that a \$5.2 million investment in community-designed solutions — centered on healthcare access as the primary lever — averted \$65.3 million in carbon emissions (with ROIs ranging from 12x to 128x), while simultaneously reducing logging households by over 90%, and infant mortality by 67%.¹⁵ This work enabled 20,000 hectares of secondary forest regrowth.¹⁶ The model works because it begins with what communities say they need — not with what external programs assume they need. This approach, which HIH calls Radical Listening, is directly applicable to fossil fuel transition planning.

Ask: No externally designed program, however well-funded, will achieve the pace, depth, or durability of results that are seen when communities dependent on and/or harmed by fossil fuels are designing their own transition. **The architecture of the transition must shift from extraction to community-designed transition and leadership from Indigenous and Local Communities.**

(d) Reflecting Diverse Realities and the Just Transition

Accountability for communities already harmed

A roadmap that addresses only future transition, without accountability for past harm, will not earn the trust of the communities whose cooperation it requires. HIH works alongside communities living in the aftermath of extraction — polluted water, degraded land, fractured governance, and introduced disease vectors. These are not abstract harms. They are the present-tense reality of people who have borne the costs of the fossil fuel economy without receiving its benefits.

Restoration of community wellbeing is inseparable from ecosystem health and carbon outcomes.

Communities cannot protect forests they cannot afford to protect. Communities cannot trust transitions that ask them to disproportionately absorb new sacrifice for global benefit.

Ask: The roadmap must include a dedicated reparations and environmental remediation fund for Indigenous and local communities already impacted by fossil fuel extraction, with direct community access and community-designed use of proceeds. Accountability for the past is a precondition for trust in the transition.

Funding the Transition:

There are more resources available to fund a just transition than is normally expected. Global subsidies of fossil fuels represent a huge pool of *hundreds of billions* of dollars that should more wisely be directed towards locally-designed solutions, livelihood retraining, and reparations and remediation.¹⁷

¹⁵ Jones, I.J. et al., "Improving Rural Health Care Reduces Illegal Logging and Conserves Carbon in a Tropical Forest," *Proceedings of the National Academy of Sciences*, 117(45), 2020. <https://www.pnas.org/doi/10.1073/pnas.2009240117>

¹⁶ N. I. I. Fawzi, A. M. Indrayani, and K. DeKay, "Forest Change Monitoring and Environmental Impact in GPNP, West Kalimantan, Indonesia," *Jurnal Ilmu Lingkungan*, vol. 17, no. 2, pp. 197-204, Sep. 2019. <https://iopscience.iop.org/article/10.1088/1755-1315/149/1/012038/pdf>

¹⁷ Jones, Natalie, Jonas Kuehl, Ivetta Gerasimchuk, and Nhat Do. "How the G7 Can Advance Action on Fossil Fuel Subsidies in 2025." *International Institute for Sustainable Development*, April 8, 2025. <https://www.iisd.org/articles/deep-dive/how-g7-can-advance-action-fossil-fuel-subsidies-2025>

"The true cost of climate change is felt in our hospitals and in our lungs. The health burden of polluting energy sources is now so high, that moving to cleaner and more sustainable choices for energy supply, transport and food systems effectively pays for itself," says Dr Maria Neira, WHO Director of Public Health, Environmental and Social Determinants of Health. "When health is taken into account, climate change mitigation is an opportunity, not a cost."¹⁸

In addition to reallocating subsidies, the road map should call on member states to redirect the enormous public funds used to manage and mitigate the human health harms created by the harmful pollutants released into public air, water, and food systems by fossil fuel extraction, refining, transport, storage, and combustion.¹⁹ The world needs a fuller and more accurate accounting of the true costs of fossil fuels.

The vast sums spent in the public's name and to cover continuing damage of an industry that harms planetary health can and should be directed to productive expenditures to pay for the future we need.

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¹⁸ World Health Organization, "Health benefits far outweigh the costs of meeting climate change goals," December 5, 2018. <https://www.who.int/news/item/05-12-2018-health-benefits-far-outweigh-the-costs-of-meeting-climate-change-goals>

¹⁹ Global Climate and Health Alliance, *Cradle to Grave: The Health Toll of Fossil Fuels*, 2nd edition, September 2025. <https://climateandhealthalliance.org/cradle-to-grave-the-health-toll-of-fossil-fuels-and-the-imperative-for-a-just-transition-2nd-edition/>