April 10th, 2026

To the UNFCCC Secretariat
COP30-TAFF-Roadmap@unfccc.int

RE: Contributions to the COP 30 Presidency Roadmap on the Transition Away from Fossil Fuels in a Just, Orderly and Equitable Manner (paragraph 28.d/GST1)

Your Excellencies, Distinguished Representatives,

On behalf of the Stockholm Environment Institute (SEI), we wish to express our sincere gratitude for the opportunity to contribute to this process and are pleased to present our submission in response to the call issued through the UNFCCC Secretariat.

We welcome the roadmap addressing the transition away from fossil fuels in a just, orderly, and equitable manner, in line with paragraph 28(d) of the Global Stocktake adopted at COP28 and appreciate that it is being pursued in an inclusive, participatory, and transparent manner. We hope our input contributes constructively to identifying practical options for implementing our collectively agreed goals.

Please find our submission attached herewith.

We remain committed to supporting this process and stand ready to engage further as the roadmap is developed.

Sincerely,

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Written input from the Stockholm Environment Institute for the COP 30 Presidency Roadmap on the Transition Away from Fossil Fuels in a Just, Orderly and Equitable Manner

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

Continued growing demand and support for fossil fuels: shifting to cleaner energy supply is obstructed by the slow progress in phasing out major fossil fuel consumption drivers and the continued expansion of fossil fuel production through new exploration and extraction licensing. Many sectors still struggle to adopt cleaner alternatives at scale due to a number of reasons such as infrastructure lock-in, upfront costs, and existing consumer preferences, resulting in the prolonging of reliance on fossil fuels. Additionally, fossil fuel expansion is entrenched by direct subsidies by the government, such as direct financial support and tax breaks for fossil fuel companies, as well as indirect subsidies, including the failure to price the true environmental and social costs of carbon emissions, which can artificially sustain demand.

Also, the Investor-State Dispute Settlement clause is embedded in many trade agreements, granting fossil fuel companies legal protections that can override countries' sovereign decisions to restrict or phase out production, thus effectively locking governments into continued extraction. The scale of the misalignment between a country's climate goals and production plans are illustrated by the Production Gap Report series (https://productiongap.org/), which consistently finds that governments' planned fossil fuel production far exceeds the levels compatible with limiting global warming to 1.5°C.

Dependence on fossil fuels at national and subnational levels, for employment, revenue, and domestic energy: Overcoming economic and fiscal reliance on oil, gas, and coal can create political and economic challenges to rapid change, particularly in growing economies of the Global South. The fact that some countries and communities are more dependent than others on fossil fuels for economic reasons must be accounted for in an equitable global transition. Additionally, existing investment in fossil fuel infrastructure carries stranded asset risks if transition timelines accelerate, while energy security concerns lead many countries to prioritize domestic production or long-term supply agreements as a hedge against price volatility and geopolitical disruption.

Policy frameworks and political systems also fail to consider the differential health and ecological impacts from fossil fuel extraction and combustion on low-income and marginalized communities. In many areas, fossil fuel extraction activities despoil the environment, undermine livelihoods and human rights, and deepen inequities and other social problems. These failures are compounded by the tendency for energy and equity concerns to be siloed across different government sectors, with energy ministries focused narrowly on energy supply and demand while health, environmental, and social agencies address impacts separately and with limited influence over energy policy, preventing the kind of integrated policymaking needed to fully account for the co-benefits of a transition.

Lack of robust planning for managed closures of fossil fuel operations: Poorly designed transitions could perpetuate existing inequalities rather than reduce them, as governments face social, economic, and political risks when transitioning affected workers and communities. This risk is heightened by limited knowledge of how closure processes affect different groups and economic sectors unevenly. The economic shock of fossil fuel activity cessation (such as mine closures) also affects labor activities connected to mining, often tied to care work, such as hospitality, food services, and hair salons – activities that often employ women and LGBTIQ+ individuals. In addition, women and LGBTIQ+ individuals in fossil fuel-dependent communities often face distinct economic vulnerabilities, barriers to reemployment, and disproportionate burdens from community-level disruption that may be overlooked in transition planning. Thus, a just transition away from fossil fuels requires strong planning and implementation capacity, which are lacking in many contexts.

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

Transforming supply and demand to promote healthy air and equitable communities: Combustion of fossil fuels in power plants, transport, industry, households, agriculture and other sectors emits harmful air pollutants, including fine particulate matter, sulfur and nitrogen oxides; once these pollutants penetrate deep into the bloodstream, they increase the risks of respiratory diseases, asthma, heart disease, stroke, cancer, dementia, and lead to premature mortality, particularly in children and elderly.

To prevent and reduce these impacts, one lever for fossil fuels phase-out should include developing a comprehensive package of decarbonization, renewable

energy infrastructure, and air quality management (AQM) measures targeted at regions heavily exposed to pollution from fossil fuel production and combustion to improve air quality. This includes phasing out subsidies and redirecting funds into targeted assistance for energy-poor households, such as by providing bill support, energy efficiency retrofits, and community-owned renewable systems.

To support this, it is important to set clear sector-specific targets for reducing combustion-related air pollutants and invest in monitoring to compare real-time air pollution against the targets. Integrate any air-quality improvements as central metrics of demand-side reforms and clearly communicate health risks.

Additionally, fossil fuels phase out plans should integrate health impact assessments to evaluate impacts of fossil fuels across the entire life cycle (cradle to end use and decommissioning) specially in Indigenous and Afro-descendant territories. Promote participatory governance and public acceptance based on setting explicit air-quality benchmarks.

Instruments to support this include the incorporation of Mandatory Health Impact Assessments into Fossil Fuel Phase-Out Plans including health costs, fossil fuel subsidy reform, carbon pricing and carbon tax, strong emissions standards by sector (demand and supply), cost assessment, governance strategy, including public communication based on risks and health benefits.

Key actors include:

- National and subnational governments: regulations and roadmaps, subsidy/tax reforms, monitoring, and sectoral/local transition plans.
- Private sector: R&D, investment, workforce support.
- Academia and scientific community: policy advice based on evidence.
- International cooperation institutions: financing and governance.

Holistic socio-economic assessments of phase-out plans: In addition to technical improvements, socio-economic assessments need to recognize the fossil fuels economy beyond the activities they directly entail. Local economic shocks affecting activities connected to fossil fuels must be adequately managed, considering the changes in demand resulting from the phase-out. These socio-economic assessments must also include sound socio-economic equity analyses that identify how phasing out fossil fuels has different impacts and opportunities depending on gender, ethnicity, and other socio-economic factors.

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

South-South cooperation (SSC) can support just transition efforts across scales through technical collaboration, institutional learning and capacity building, and the co-creation of strategies to tackle mine closures, green industrialization, and inclusive development; to channel resources and avoid duplication, stakeholder fatigue and inefficiencies common in international cooperation; and center justice through locally-grounded gender and intersectional approaches.

Technical exchanges can address mine closure challenges – including social, regulatory, and engineering; ecological restoration and compensation; water management; contamination mitigation; land and infrastructure repurposing, job retraining for economic diversification. It can include negotiating finance terms and avoiding unfavorable arrangements under debt burdens, navigating legal challenges around trade and investor protection agreements, holding international firms accountable, and building multipolar trade and S-S economic exchange.

South-South cooperation exchange should involve government officials (municipal to national levels) with permanent, technical roles who can carry lessons across electoral cycles, as well as civil society and knowledge institutions, who can provide lessons from academic and non-governmental models for establishing government exchange platforms. South-South Cooperation platforms and similar can help coordinate international finance to national and subnational levels, as well as technical exchange. Examples of institutional infrastructure in South Africa include the JET Investment Plan, the JET Project Management Unit, and the classification and bank of JT projects.

(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?

Uncoordinated national roadmaps will fail to meet the climate goals without a global response based on equitable cooperation. A coalition of 300+ CSOs, in collaboration with scientific and technical experts, has detailed a framework for such a response in a series of reports and analyses (www.equityreview.org). The framework's core principles include:

(1) minimize social disruption by allowing countries that are most socially dependent on fossil fuels for employment, revenue, and domestic energy to transition over longer periods than those that are less socially dependent.

(2) Share transition costs according to capacity to bear those costs. Institutions of international cooperation can facilitate support from countries with greater capacity to those with less. This support can manage energy price instability, ensure fossil supply and demand are consistent with each other and with fair phaseout roadmaps, ensure finance and investment, and align institutions of trade and technology.

While it is national actors at all levels who are ultimately responsible for implementing actions, this solution provides a framework within which national governments can negotiate and converge on accepted responsibilities and commitments that are coherent and consistent with science and equity and the Paris goals.

This solution requires a functioning multilateral forum in which nations can clearly articulate and negotiate a basis for responsibilities and commitments, as well as a vibrant civil society that can substantively engage in political discourse. It also relies on institutions and mechanisms that can enable and facilitate international cooperation.