

## Transparency International - Submission to the COP 30 Presidency Roadmap on the Transition Away from Fossil Fuels

**Submitter organisation: Transparency International (TI).** About TI: The world's largest anti-corruption movement/organisation present in more than 110 countries, strengthening the integrity of climate governance to enable climate diplomacy and action to be delivered more effectively.

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### What are the most critical institutional barriers preventing a transition away from fossil fuels?

- The UNFCCC lacks a conflict-of-interest framework and integrity safeguards shielding COPs from the influence of fossil fuel interests, leaving international climate diplomacy exposed to fossil fuel industry interference, undermining trust in COPs and making COPs weaker and less effective.
- Fossil fuel industry influence shapes negotiating positions, weakens COP outcomes, and *undermines the ability of Parties to cooperate on a just transition away from fossil fuels*. It also sidelines civil society, Indigenous peoples, and climate vulnerable states.
- Transparency and integrity gaps undermine the legitimacy of international negotiations and hinder diplomatic cohesion. This influence risks turning COPs also into platforms for fossil fuel diplomacy rather than genuine multilateral cooperation aimed at phasing out fossil fuels.
- Evidence based for this: the Kick Big Polluters Out civil society coalition reported more than 1,600 fossil fuel lobbyists attended COP30 —one in every 25 participants— marking the highest concentration recorded, which severely skews diplomatic power dynamics. Fossil fuel lobbyists outnumbered nearly every national delegation except Brazil and exceeded the combined delegates of the 10 most climate vulnerable nations. Transparency International's analysis found that 54% of participants in national delegations either did not disclose or selected a vague "Guest" or "Other" affiliation categories of COP participants. For COP29 nearly 70% of fossil fuel lobbyists were accredited via state delegations according to Transparency International's research, and at COP28 and COP29 among 466 companies attending, 88% had no clear support for the Paris Agreement since early 2024, and 65% were entirely silent on climate policy.

### What potential institutional levers exist for accelerating the implementation of the transitioning away commitment? – Focus on “Institutional and governance frameworks”

The overall institutional lever is strengthening the integrity architecture of the UNFCCC and COP processes to prevent undue influence of fossil fuel interests that slow down, weaken and undermine a just transition away from fossil fuels in the multilateral climate diplomacy. This includes adopting:

- 1) **Accountability framework including UNFCCC conflict of interest (COI) definition and policy** that addresses risks posed by fossil fuel industries. Under a COI definition and policy, the participation of fossil fuel industries could be regulated in a transparent and accountable manner.
- 2) **Full transparency and public disclosure for all COP participants** covering affiliations, funding sources, and requirement to disclose agreement with Paris Agreement goals.

- 3) **Integrity standards for COP Presidencies**, including prohibiting fossil fuel sponsorships, partnerships and consultancies; requiring declarations of interest for all members of the COP Presidencies; establishing and implementing lobbying registries for COP Presidencies and setting up and oversight body overseeing the implementation of these integrity standards.

Operational responsibility for these reforms lies with the UNFCCC Secretariat, Parties and COP Presidencies, who would codify COI rules, disclosure systems, and presidency standards; with Parties implementing integrity requirements for their delegations; and with all observers—including businesses and civil society—complying with enhanced transparency norms.

### What best practices and lessons learned can be shared for addressing barriers and advancing solutions? Focus on “Institutional and governance frameworks”

- **Party best practices:** several Parties already actively refrain from including fossil fuel industry interest representatives in their national delegations (and party overflow). This includes among others the delegations of Germany and the European Union. Such practices could be institutionalized across Parties.
- **UN level best practice (1): the WHO Framework Convention on Tobacco Control (FCTC)** establishes a global conflict of interest (COI) regime through Article 5.3, which mandates that public health policymaking be protected from the commercial and vested interests of the tobacco industry. The UNFCCC could closely collaborate with the WHO and other bodies to develop a similar COI framework regulating the participation of fossil fuel industries. For more information, Article 5.3 Guidelines affirm that there is a “fundamental and irreconcilable conflict” between tobacco industry interests and public health, requiring governments to limit interactions with the industry, ensure full transparency, prevent partnerships, and adopt measures to avoid COIs involving public officials. The policy also excludes the participation of tobacco industries in State Party negotiations of tobacco control.
- **UN level best practice (2): the UN Convention on Biological Diversity (CBD)** includes a formal “procedure for avoiding or managing conflicts of interest in expert groups”, adopted to ensure transparency, scientific integrity, and independence in the work of technical and scientific advisers. The procedure requires experts to disclose relevant interests, enables the Secretariat to manage or mitigate potential COIs, and mandates recusal where necessary, strengthening the credibility of expert inputs into CBD COP decisions.
- **UN calls for action towards the UNFCCC:** the UN Special Rapporteur on Human Rights and Climate Change in 2025 in its special report delivered to the UN Human Rights Council said: *„The UNFCCC Secretariat and UNEP should develop transparent and accountable systems against undue influence by fossil fuel corporate lobbying and conflict of interests”*.