

Submission to Inquiry on International Climate Policy¹

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Summary:

The UK's ability to lead on international climate policy depends fundamentally on strong, credible domestic delivery grounded in climate science. Limiting global warming requires adherence to a finite global carbon budget, making rapid emissions reductions, long-term governance, and sustained investment essential. The UK is well positioned to lead. The Climate Change Act 2008 provides a globally respected framework of legally binding targets, five-year carbon budgets, independent oversight by the Climate Change Committee, and transparent monitoring. This architecture has enabled continuity across political cycles and underpins the UK's credibility in international climate negotiations. Maintaining delivery against carbon budgets is critical to preserving this advantage.

Climate action and economic growth can reinforce one another. The UK's net-zero economy is growing faster than the wider economy, with strong spill-over benefits. Clean energy, industrial decarbonisation, and low-carbon manufacturing are established growth sectors, supported by public procurement and investment strategies. Clean technologies are often cheaper over their lifetime than fossil alternatives, but high upfront costs, limited access to finance, and information gaps for low-income households and small businesses in particular require targeted policy intervention to ensure a fair transition.

Public support for climate action is high and consistently underestimated by policymakers. Misjudging this support risks unnecessary policy retrenchment and weakens long-term delivery. As the UK's relative geopolitical and economic weight declines, credibility and soft power matter more, and sustained leadership on climate policy is therefore strategically important. Internationally, UK influence is strongest when ambitious domestic action is paired with leadership through the UN climate system. Meeting 2030 and 2035 emissions targets primarily through domestic reductions (rather than reliance on international offsets) strengthens the UK's ability to advocate for fossil fuel transition, subsidy reform, and robust net-zero governance globally.

Climate finance is central to international trust and cooperation. As an early industrialised country and global financial centre, the UK has both a responsibility and an opportunity to lead on the post-2025 global climate finance framework, including contributions to the New Collective Quantified Goal and reforms that reduce the cost of capital for developing countries.

¹ **Disclaimer:** The contents of this document and the views expressed solely represent those of the authors and do not necessarily represent those of the Smith School of Enterprise and the Environment, or any other institution.

Non-state actors are essential to accelerating global net zero through investment, supply chains, and norm-setting. Clear policy signals, stable regulation, and strong standards enable this leadership. At the same time, greater transparency is needed to ensure climate commitments are not undermined by obstructive lobbying.

Taken together, credible domestic delivery, fair and ambitious climate finance, empowered and accountable non-state actors, and science-based diplomacy form the foundation of effective UK leadership on international climate policy.

Key Policy Recommendations

- **Maintain stable, long-term climate governance**
 - Uphold the integrity of the Climate Change Act, carbon budgets, and independent oversight to ensure continuity and credibility across political cycles.
 - **Prioritise delivery of domestic emissions reductions**
 - Meet 2030 and 2035 NDCs primarily through domestic action rather than international offsets, reinforcing international leadership and trust.
 - **Align climate policy with economic growth strategies**
 - Treat clean energy and industrial decarbonisation as core growth sectors, using public procurement and investment to scale low-carbon supply chains.
 - **Address affordability and fairness in the net-zero transition**
 - Combine regulation, incentives, and targeted public investment to overcome upfront cost and finance barriers, particularly for low-income households and small businesses.
 - **Strengthen political confidence by recognising public support**
 - Act on evidence that public backing for climate action is high, and avoid policy rollbacks driven by misperceptions of voter opposition.
 - **Lead on international climate finance**
 - Contribute the UK's fair share to the post-2025 climate finance goal, including support for mobilising large-scale finance for developing countries.
 - Use the UK's role in multilateral development banks and as a global financial centre to reduce the cost of capital through guarantees, de-risking, and regulatory reform.
 - **Leverage scientific and institutional strengths**
 - Expand science diplomacy and knowledge-based engagement to shape global climate governance and technology cooperation.
 - **Empower non-state actors while ensuring accountability**
 - Provide a clear and stable policy environment for businesses and investors.
 - Support robust, internationally recognised net zero standards, including forthcoming ISO net zero standards.
 - Improve transparency and integrity of corporate climate-lobbying disclosures.
 - **Improve coordination across levels of governance**
 - Strengthen alignment between international, national, sub-national, and non-state actors to maximise policy coherence and impact.
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UK Government Leadership

Climate change and net zero are grounded in physical science. Limiting global temperature rise requires adherence to a finite global carbon budget for carbon dioxide and other greenhouse gases (GHGs). Emissions beyond this budget must be balanced by removals through natural or engineered sinks. Effective climate policy therefore depends on translating scientific constraints into credible, long-term governance and delivery.²

1. How important is domestic delivery on climate action and climate governance to the UK's climate leadership on the global stage?

The UK's credibility as a global climate leader rests fundamentally on successful domestic delivery of economic and social transitions to net zero. International influence is strengthened when domestic policy demonstrates that economic prosperity and emissions reduction can be achieved together. Evidence shows that climate action and economic growth are not mutually exclusive when supported by sound policy frameworks.³ This requires several elements:

- i. **Stable and long-term governance on environmental issues:** The UK begins from a position of relative strength due to its established climate governance architecture. The Climate Change Act 2008 provides stable, long-term direction through legally binding targets, five-yearly carbon budgets, an independent advisory body (the Climate Change Committee), and statutory monitoring and reporting requirements. This framework has ensured continuity across political cycles and enabled the UK to continuously update and maintain the relative sufficiency of its Nationally Determined Contributions (NDCs). The UK Government's strong unilateral climate actions are easily translated to agreed international commitments.⁴
- ii. **Delivery on carbon budgets:** Regular progress reports from the Climate Change Committee, alongside government Carbon Budget Delivery Plans, provide transparency on performance against targets, highlight areas requiring further policy action or investment, and delivery of the first for Carbon Budgets. This governance system allows delivery to be tracked regardless of political changes, putting the UK in a position of strength relative to many of its international partners

² Fankhauser, S., Smith, S.M., Allen, M. *et al.* The meaning of net zero and how to get it right. *Nat. Clim. Chang.* 12, 15–21 (2022). <https://doi.org/10.1038/s41558-021-01245-w>

³ Oxford Smith School (2025). There is no trade-off between net zero and economic growth. https://www.smithschool.ox.ac.uk/sites/default/files/2025-06/PM_letter_No_trade_off_between_net_zero_and_economic_growth.pdf

⁴ Gonsalves Wetherell et al. (2025). "Integrating Climate and Trade Strategies: A Method-Driven Approach to Policy Alignment. Smith School Policy Brief. <https://www.smithschool.ox.ac.uk/sites/default/files/2025-04/Integrating-Climate-and-Trade-Strategies.pdf>

which it ought to take advantage of this whilst pursuing leadership on international climate action and climate negotiations.

- iii. **Investment in net zero industries:** The Confederation of British Industry (CBI) shows that the growth in the UK's 'green' sector is three times faster than that the economy overall, with a strong multiplier: every £1 of value directly generated from net zero businesses adds an additional £1.89 of value to the UK economy.⁵ Clean energy industries are identified as a core growth sector in the Government's Invest 2035 strategy, supported by economic analysis from the Council of Economic Advisers.⁶ Internationally, the UK has taken a leadership role in industrial decarbonisation initiatives, including commitments to procure low- and near-zero carbon steel, cement and concrete through public purchasing, helping to scale global supply chains for these materials.⁷

Oxford research indicates that rapid transitions to renewable energy could increase GDP in low- and middle-income countries by around 10% over 25 years by boosting energy-sector productivity.⁸ Aligning domestic climate policy with export and development strategies can therefore support both UK growth and global development objectives.⁹

- iv. **A model for aligning economic policy with climate policy:** A central policy challenge is aligning economic and climate policy in a way that delivers fairness and public support. Oxford research has shown that in more than 80% of energy technology investments, the total 'lifetime' cost of a clean technology is considerably lower than that of a fossil technology.¹⁰ While clean technologies are often cheaper over their lifetime than fossil alternatives, high upfront costs, access to finance, information gaps and non-monetary barriers including misconceptions of costs can deter investment by households and small businesses—particularly those that are fuel poor, lower income, or renting. A balanced domestic policy mix,

⁵ CBI (2025). The Future is Green: The economic opportunities brought by the UK's net zero economy. <https://ca1-eci.edcdn.com/250224-ECIU-CBIE-2024-Net-Zero-Economy-FINAL.pdf?v=1740388273>

⁶ Department for Business & Trade (2024) Invest 2035: the UK's modern industrial strategy. 24 November 2024; Serin, E., Stern, N., van Reenen, J., Valero, A., Ward, R.E, and Zenghelis, D. (2024) "Boosting growth and productivity in the United Kingdom through investments in the sustainable economy" LSE Policy Report.

⁷ UNIDO, nd. Green Public Procurement. <https://decarbonization.unido.org/policies/green-public-procurement/>

⁸ Fankhauser et al. (2025). "The economic benefits of renewable energy and how to share them." Oxford Smith School Report. <https://www.smithschool.ox.ac.uk/sites/default/files/2025-11/The-economic-benefits-of-renewable-energy-and-how-to-share-them.pdf>

⁹ Gonsalves Wetherell et al. (2025). Ibid.

¹⁰ Sen, A., Lightfoot Brown, H. and Fankhauser, S. (2024). "Getting a Good Deal on Net Zero." Oxford Smith School Policy Brief. <https://www.smithschool.ox.ac.uk/sites/default/files/2024-07/Getting-a-Good-Deal-on-NetZero.pdf>. Sen, A. and Fankhauser, S. (2024). "Net zero is not just good science – it's also a good deal for ordinary people." *The Conversation*. <https://theconversation.com/net-zero-is-not-just-good-science-its-also-a-good-deal-for-ordinary-people-231259>

combining regulation, incentives, public investment and targeted support, is required to ensure that savings from lower operating costs are accessible across society, particularly where the initial upfront capital investment is needed.¹¹

- v. **Demonstrating how to build social and political support for environmental and climate policy:** Public support is essential for durable climate policy. Oxford research shows that policymakers consistently underestimate public willingness to support and contribute to climate action.¹² While around 69% of the UK public support climate action, surveyed policymakers estimated public support at only 37%.¹³ The findings come after recent clamours for a “reset” on climate policies from leading political figures, due to a claimed lack of public support.¹⁴ Addressing this misperception is important to maintaining political confidence and avoiding unnecessary retrenchment.

Climate leadership also has strategic geopolitical value to the UK. As the UK’s relative economic and diplomatic weight has declined compared with larger economies such as the EU, US, China and India, credibility and soft power have become more important. The UK’s record as a technical leader (Climate Change Act and Climate Change Committee), diplomatic convener (including COP26), and first mover (coal phase-out and offshore wind deployment) has reinforced its influence. Domestic implementation of NDCs, while not legally enforceable under the Paris Agreement, is essential to maintaining this credibility. Finally, weaker geopolitical influence and economic standing imply that ‘soft power’ credibility matters more. As ‘hard power’ influence (e.g. through the ability to impose punitive economic measures) declines, credibility becomes the UK’s currency and being a leader on climate, a critical global issue, is a very clear way to earn this.

2. How can the UK most effectively engage with the UN climate architecture in developing, establishing and implementing international climate policy?

Effective engagement with the UN Framework Convention on Climate Change (UNFCCC) and the Paris Agreement depends on aligning confident domestic leadership with multilateral action. The UK can exercise influence through ambitious emissions reduction targets, facilitating climate finance to developing countries, and leveraging its scientific and institutional strengths.

¹¹ *ibid.*

¹² Innocenti et al. (2025). “Policymakers underestimate public support for climate action.” Oxford Smith School. <https://www.smithschool.ox.ac.uk/news/policymakers-underestimate-public-support-climate-action>

¹³ Fang, X., Ettinger, J. & Innocenti, S. United Nations Environment Assembly attendees underestimate public willingness to contribute to climate action. *Commun Earth Environ* 6, 622 (2025). <https://doi.org/10.1038/s43247-025-02536-2>

¹⁴ BBC (2025). Tony Blair says current net zero policies “doomed to fail”. <https://www.bbc.co.uk/news/articles/cpvrwyp0jx3o>

- i. **Leadership on absolute emissions reduction targets:** The UK has a history of shaping ambitious multilateral outcomes, including early engagement through forums such as the 2010 Cartagena Dialogue which laid the foundations for the Paris Agreement.¹⁵ The 2008 Climate Change Act has served as a model for climate framework legislation globally.¹⁶ Continued leadership requires meeting ambitious, economy-wide absolute emissions reduction targets, and peaking GHG emissions with a view to reaching net zero.

Evidence shows that demonstrated domestic ambition strengthens the UK's ability to advocate internationally for fossil fuel transition, subsidy reform, and robust net zero governance.¹⁷ In designing its Carbon Border Adjustment Mechanism (planned for 2027), the UK can learn from the implementation of equivalent policies in the EU in 2026, and consider earmarking revenues for climate action to enhance fairness and impact.

- ii. **Facilitating climate finance and building trust:** Climate finance is central to enabling global transition yet has proven to be a divisive issue in international negotiations. As an early industrialised country, the UK has both a responsibility and an opportunity to lead. While the UK has submitted indicative finance information under Article 9.5 of the Paris Agreement, recent reductions in climate and development finance risk undermining trust. The UK should contribute its fair share to the post-2025 New Collective Quantified Goal on climate finance, including support for mobilising US\$1.3 trillion annually for developing countries, as agreed under the UNFCCC CMA6 decision.¹⁸ This could establish the UK as a leader in designing a fair and equitable international climate policy on climate finance.

Through its roles in multilateral development banks and climate funds—including the Green Climate Fund, Adaptation Fund and Loss and Damage Fund—the UK can help address barriers such as high costs of capital. As a global financial centre, it can also promote regulatory and financial reforms that improve capital flows to developing countries, including guarantees, de-risking instruments, and improved risk assessment practices. Innovative sources of climate finance, such as redirecting fossil fuel subsidies, taxing fossil fuel revenues, or levies on carbon-intensive activities, could also be piloted. These approaches would strengthen the credibility and scale of international climate finance.

¹⁵ Gov.UK (2016). "Cartagena Dialogue meets in Guatemala for a constructive discussion on climate negotiations." <https://www.gov.uk/government/news/cartagena-dialogue-meets-in-guatemala-for-a-constructive-discussion-on-climate-negotiations>

¹⁶ Gonsalves Wetherell et al. (2025). Lockwood, M. (2021). A hard Act to follow? The evolution and performance of UK climate governance. *Environmental Politics*, 30(sup1), 26–48

¹⁷ *ibid.*

¹⁸ UNFCCC (2024). CMA 6. <https://unfccc.int/event/cma-6>

- iii. **Leveraging Scientific and Institutional Strengths:** The government should leverage the UK's scientific and institutional strengths to help shape global climate governance through knowledge-based diplomacy. The concept of 'science diplomacy' encompasses political support for science in an international context, including the formal and informal exchanges that lead to cross-border research collaborations, science advice for international policymaking and public engagement activities.²² As an example, the UK's current leadership of Mission Innovation helps build international support and collaboration for early-stage technologies needed to reach net-zero.²³ Models of engagement such as this should be encouraged and developed (Also see response to Q1 above).

3. **How do the UK's 2030 and 2035 Nationally Determined Contributions (NDCs) impact domestic climate action, and how does it compare globally on NDCs?**

The UK has demonstrated significant leadership in its NDC targets (most recently, a target to cut emissions to 81% below 1990 levels by 2035). NDCs should translate into more granular sector-specific strategies and policy frameworks. Most significantly, the UK government has acknowledged the scientific advice that details how it can reach its targets domestically, rather than using Article 6 trading to offset its emissions.²⁴ In this way it has shown that ambition need not be weakened by the prospect of international cooperation, but instead strengthened (See also response to Question 6).

Non-state actor involvement and leadership

4. **What impact does the increasing involvement globally of non-state actors - such as local governments, businesses, investors, NGOs and communities – in leading climate action have?**

Non-state actors are essential to achieving global net zero. Despite narratives of corporate backtracking, the number of organisations adopting net zero targets continues to grow, even in jurisdictions including the United States where climate action has soured at a Federal level.¹⁹ There is an emerging trend of "playbooks" and business coalitions that are advocating for responsible business practices.²⁰ Through investment decisions and global supply chains, non-state actors can drive emissions reductions beyond the reach of national policy alone. However, the growing influence of non-state actors also underscores the importance of transparency and accountability, particularly with respect to lobbying and policy engagement. While

¹⁹ Net Zero Tracker (2025) Net Zero Stocktake. <https://zerotracker.net/analysis/net-zero-stocktake-2025>

²⁰ WMBC (2025). Climate ambition to advocacy: A framework for responsible policy engagement <https://www.wemeanbusinesscoalition.org/climate-ambition-to-advocacy-a-framework-for-responsible-policy-engagement/>

many support ambitious climate policy, others continue to exert pressure to delay or weaken action.²¹

- i. **Non-state actors accelerate the ambition loop towards net zero.** NSAs can reinforce the effectiveness of government policies and climate targets by using their spending and setting their own targets in response to pro-climate government policy, thus creating momentum and confidence for further ambitious climate governance.²² Research shows that this dynamic is particularly pronounced where there is trust in strong public institutions, including the UK.²³ Within this dynamic, companies need confidence and clarity from policymakers to act. Additionally, transparent engagement between NSAs and policymakers can ensure policies reflect market conditions and make the most of emerging economic opportunities.
- ii. **NSAs exert global influence through their supply chains.** Analysis of companies with net zero targets demonstrates that Scope 3 target setting by European and North American companies is driving net-zero ambition amongst Asian firms.²⁴ These findings demonstrate the considerable global influence that NSAs can have through their procurement choices. Crucial to this dynamic is the presence of strong voluntary and mandatory governance regimes that require firms to set targets across their Scopes 1-3. Translation of voluntary standards and initiatives into government regulation will be critical for scaling potential impact of firms' supplier choices and augmenting a shift-change across jurisdictions.²⁵
- iii. **Greater transparency is needed regarding the climate-lobbying activities of NSAs.** Organisations at risk from the net zero transition are particularly engaged in strategic advocacy to delay, confound, or obstruct government transition policy.²⁶ One cause is weak government rules preventing transparency and integrity of corporate lobbying disclosures, with a dependence upon voluntary governance frameworks. As a result, NSAs can set Paris-aligned net zero targets whilst also engaging in obstructive lobbying activities, stymying wider societal and business decarbonisation progress.

5. What role do UK non-state actors have in leading on international climate action and how can the UK Government best support them?

²¹ Somo (2025). The secretive cabal of US polluters that is rewriting the EU's human rights and climate law <https://www.somo.nl/the-secretive-cabal-of-us-polluters-that-is-rewriting-the-eus-human-rights-and-climate-law/>

²² Eskander et al. (2024). *Testing the Ambition Loop, Do Country- and Company-Level Net-Zero Targets Reinforce Each Other? A Global Comparison*. <https://www.tandfonline.com/doi/full/10.1080/13876988.2024.2317949>

²³ *ibid.*

²⁴ SBTi (2025). *SBTi Trend Tracker*. <https://sciencebasedtargets.org/reports/sbti-trend-tracker-2025>

²⁵ Hale et al. (2024) *Turning a groundswell of climate action into ground rules for net zero* <https://www.nature.com/articles/s41558-024-01967-7>

²⁶ InfluenceMap (2025) *Climate and Energy Lobbying in the UK*. <https://influencemap.org/report/Climate-Lobbying-in-the-UK>

Non-state actors have a role in leading international climate action by demonstrating credible leadership in national contexts and exerting influence internationally through supply chains, capital allocation, and norm-setting. In the context of increasing global political uncertainty, sustained leadership by UK non-state actors is particularly valuable. The UK government has a central role in empowering and encouraging action by non-state actors, whilst ensuring transparency and accountability, which provides increased confidence in the market.

- i. **Provide a clear, consistent, and stable policy environment to enable climate action and effective global supply chain engagement.** The UK's long-standing legislation and policy architecture have positioned it as a global leader, and many non-state actors have already committed significant capital on this basis. Policy instability risks undermining these investments and weakening the UK's international credibility. UK non-state actors have called for further policy interventions and increased targets both domestically and internationally, including a more ambitious electric vehicle policy in the UK and a 90% GHG emissions reduction target by 2040 in the EU.²⁷
- ii. **Ensure that pledges by non-state actors are backed up by transparent and effective plans to demonstrate credibility and effectively drive international action.** The landscape of net zero standards has matured significantly, providing clearer definitions of net zero alignment and pathways for delivery. Evidence indicates that organisations participating in formal accountability frameworks demonstrate stronger and more comprehensive climate action than those that do not.²⁸ Supporting engagement with robust standards enhances international leadership by UK non-state actors and reduces the risk of greenwashing, which can undermine trust and weaken global influence. In this context, the forthcoming ISO 14060 standard on Net Zero Aligned Organisations, currently under international consensus development and expected in 2026, represents a critical opportunity. Proactive UK engagement with, and eventual adoption of, this standard would provide businesses with an internationally recognised benchmark for net-zero alignment, including expectations related to global supply chain engagement, which is a core component of most net zero standards.²⁹ Most jurisdictions now reference at least one such framework, underscoring standards' relevance to international climate governance.³⁰ The

²⁷ Climate Group (2025) Inspire the nation on EVs, EV100 members tell the UK Government [https://www.theclimategroup.org/our-work/press/UK-EV-campaign; The Standard \(2025\) New coalition urges Mayor to rethink axeing of C-charge exemption for EVs](https://www.theclimategroup.org/our-work/press/UK-EV-campaign; The Standard (2025) New coalition urges Mayor to rethink axeing of C-charge exemption for EVs) <https://www.standard.co.uk/business/ev-congestion-charge-mayor-central-london-b1236098.html> ; [University of Cambridge Corporate Leaders Group \(2025\) Business and Investors call on the EU to Set a Greenhouse Gas Emissions Reduction Target of at least 90% by 2040.](https://www.universityofcambridge.ac.uk/news-and-features/2025/06/25/business-and-investors-call-on-the-eu-to-set-a-greenhouse-gas-emissions-reduction-target-of-at-least-90-by-2040) <https://www.corporateleadersgroup.com/news/business-and-investors-call-eu-set-greenhouse-gas-emissions-reduction-target-least-90-2040>

²⁸ Net Zero Tracker (2025). Net Zero Stocktake, 2025. <https://zerotracker.net/analysis/net-zero-stocktake-2025>

²⁹ Becker et al. (2024) Governing Net Zero: assessing convergence and gaps in the voluntary standards and guidelines landscape https://netzeroclimate.org/wp-content/uploads/2024/06/ONZ_Standards_Mapping_Report_2024_2.pdf

³⁰ 27 of 30 jurisdictions mapped by the Climate Policy Monitor in 24/25 incorporated at least one voluntary standard or framework into a policy document. Source: Climate Policy Monitor (2025) <https://climatepolicymonitor.ox.ac.uk/>

importance of transparency by non-state actors in strengthening global climate action has also been highlighted by the UN Environment Programme.³¹

- iii. **Promote dialogue between multiple levels of governance (international <> national <> non-state actors)** Greater vertical coordination can help avoid policy inconsistencies and enable leadership by non-state actors. Subnational actors, particularly cities and regions, often play a leading role in climate action, strengthening implementation of national plans, but is not currently used to its full potential.³²

Climate Finance

6. **What approach should the Government take to the UK's climate finance arrangements post-March 2026? How much difference does political uncertainty make to climate finance?**

A clear distinction must be upheld between climate finance under Articles 5 and 9 of the Paris Agreement, and financing of internationally traded mitigation outcomes under Article 6 of the Paris Agreement.³³ Clear distinction between domestic mitigation and international climate finance obligations is necessary, with litigation risks for not doing so evidenced by ongoing legal proceedings³⁴ in the Netherlands, for example.

³¹UNEP (2023) New UN report identifies how non-state actors can strengthen climate action transparency. <https://www.unep.org/technical-highlight/new-un-report-identifies-how-non-state-actors-can-strengthen-climate-action>

³² Averchenkova A and Chan T (2023) Governance pathways to credible implementation of net zero targets. <https://www.lse.ac.uk/granthaminstitute/wp-content/uploads/2023/10/Governance-pathways-to-credible-implementation-of-net-zero-targets.pdf>

³³ Johnstone, I., Pelz, S. and Kuci, S. (2025). "Towards a Net Zero Aligned Paris Agreement Crediting Mechanism." Oxford Smith School Policy Brief. <https://www.smithschool.ox.ac.uk/sites/default/files/2025-06/Towards-a-Net-Zero-Aligned-Paris-Agreement-Crediting-Mechanism.pdf>

³⁴ Greenpeace (2025). Residents of Bonaire and Greenpeace Netherlands sue the Dutch State for lack of climate protection. <https://www.greenpeace.org/international/press-release/79104/residents-of-bonaire-and-greenpeace-netherlands-sue-the-dutch-state-for-lack-of-climate-protection/>