

Claimant

CT Callil

First

30 November 2017

IN THE HIGH COURT OF JUSTICE  
QUEEN'S BENCH DIVISION  
ADMINISTRATIVE COURT

Claim No: CO/

BETWEEN:

THE QUEEN

on the application of

- (1) PLAN B. EARTH
- (2) CARMEN THERESE CALLIL
- (3) JEFFREY BERNARD NEWMAN
- (4) JO-ANNE PATRICIA VELTMAN
- (5) LILY [REDACTED] JOHNSON
- (6) MAYA YASMIN CAMPBELL
- (7) MAYA DOOLUB
- (8) PARIS ORA PALMANO
- (9) ROSE NAKANDI
- (10) SEBASTIEN JAMES KAYE
- (11) WILLIAM RICHARD HARE
- (12) MHB (A CHILD) BY HIS LITIGATION FRIEND DHB

Claimants

- and -

SECRETARY OF STATE FOR BUSINESS, ENERGY AND INDUSTRIAL STRATEGY

Defendant

- and -

THE COMMITTEE ON CLIMATE CHANGE

Interested Party

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FIRST WITNESS STATEMENT OF DAME CARMEN THERESE CALLIL

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I, CARMEN THERESE CALLIL, of [REDACTED], SHALL SAY AS FOLLOWS:-

1. I am an Australian born writer and publisher and have lived in London since 1960. I have been concerned with systemic injustice my whole life. I established Virago Press in 1972 as a counter to what was then the male dominance of the publishing and writing world. I have written about the atrocities of the 20<sup>th</sup> century in World War II, in particular about Vichy France and the price paid by humanity for their complicity with Nazi Germany. Climate change appears to me an extraordinary case of injustice – a crime against all humanity and all species and living things belonging to the natural world.
2. I make this statement in support of the claim for judicial review brought by Plan B. Earth (“Plan B”), me and others against the defendant Secretary of State for Business, Energy and Industrial Strategy for failing to revise the UK’s carbon target pursuant to his powers under the Climate Change Act 2008 (“2008 Act”).
3. Except where otherwise stated, the facts and matters set out in this witness statement are within my own personal knowledge. Where they are not, I identify the source of my understanding and belief. It will also be clear from the context where certain statements are matters of opinion. I endeavour to explain the basis of that opinion.
4. I am now 79 years old. I have had lung cancer, pre-cancerous breast cancer, a slipped disc, and my hearing is impaired. It has been clear to me for many years past that I should not live in London because of my breathing problems. The pollution in the city is not only bad for me – which it seriously is – but for all inhabitants of London. I believe those difficulties are exacerbated by climate change.
5. In addition, I am not married and am childless. Thus I have had an excellent life being godmother to many children of my many friends. When I think of the childhood, youth and young age I had, I feel extremely strongly that an undamaged world will not be offered to my god children or any other children. I wish to do something about this, on their behalf, before I die.
6. I am a resident of the London Borough of Kensington & Chelsea (“RBK&C”), where Grenfell Tower is located, and which I see all too clearly outside my windows every day. I only recently cleaned the soot from the fire from my windowsills. The tragedy is heavy

in the air and will remain so for many years. It appears the hazards that led to the fire had been identified and that remedial action had been advised well in advance. The RBK&C council ignored both advice, warning and requests. All of us who live in this area were and are aware of this: because of imagined cost and inconvenience, and the determined privatisation of what is now valuable North Kensington property, or possibly the work was just put off to another day. If the clocks could be turned back, the cladding could have been removed, and the residents of North Kensington listened to as to the dangers of the recent "improvements" to Grenfell. It can only be hoped that now nobody would pass by the opportunity to do so.

7. There is, in my view, a chilling parallel with the carbon target under the 2008 Act. The science is clear: the current target creates unacceptable risks of appalling tragedy. The Government does not deny this, but suggests that doing better is too difficult and can be put off to another day. Already wildfires are commonplace across Europe and beyond.
8. Of course once the fire takes hold we do not get the chance to turn the clocks back. We are left to wish we had taken the necessary action while we could. The Government knows full well its carbon target for 2050 is not enough. It knows the risks of exceeding the Paris Agreement temperature goal are intolerable. "Too hard" is not an answer. Nor is "tomorrow". The Government must aim to prevent disaster by setting an appropriate target and an example for others to follow.
9. As someone over the age of 65, I bring this case on behalf of all human beings, all animals and all living things.
10. It is for these reasons that I decided to bring this this claim for judicial review as a co-claimant.

#### Costs

11. I understand that the costs recoverable from me in the event that this claim is unsuccessful, are limited by the Aarhus rules, which the Defendant accepts apply to this case.
12. Aside from the concerns that I identify above, my decision to bring this claim as a co-claimant is based on: (a) my understanding that my notional costs liability in the proceedings would be no greater than £5,000; and (b) on the expectation that such funds

will be raised through crowdfunding on the CrowdJustice website. If such funds are not raised, or if the Court orders that my potential liability is increased and such additional funds cannot be raised, then I would consider my potential liability would be too great to justify my further involvement and I would accordingly withdraw from the proceedings. I understand that I may be liable for some limited costs up until the point of any such withdrawal, and Plan B will provide me with an indemnity in respect of any such costs if they cannot be funded by Crowdfunding.

13. For the benefit of the Court, I set out a financial schedule and related information in accordance with CPR Rule 45.2 in a confidential annex to this witness statement.

#### STATEMENT OF TRUTH

I believe that the facts in this witness statement are true.

Signed .. 

Dame Carmen Thérèse Callil

Dated .. 30<sup>th</sup> November 2017