

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

Claim No: CO/

B E T W E E N :

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

FIRST WITNESS STATEMENT OF MAYA YASMIN CAMPBELL

I, MAYA YASMIN CAMPBELL, of [REDACTED] SHALL SAY AS FOLLOWS:-

1. I am a young woman of colour and a politics student at Newcastle University, studying the ethics of climate change. I make this statement in support 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").
2. 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, and I have endeavoured to explain the bases of those opinions.

My background and my reasons for supporting the challenge

3. My concerns about climate change stem from questions regarding the sort of world I want to live in and that I would want my children and grandchildren to grow up in; from air quality to distribution of resources that are vital to our well-being.
4. First, as a young woman, aware of what more than 1.5°C warming would mean for life on this planet, I am concerned that the responsibility of climate change mitigation is being disproportionately imposed upon future generations, as well as on my own younger generation.
5. Secondly, I am concerned that increasingly intense hurricane seasons will make the Caribbean a dangerous place to live. My family lives in Jamaica and it is very plausible that the devastation caused in the summer of 2017 will not just recur but get worse. I worry for the safety of those on Islands vulnerable to hurricanes/ typhoons.
6. Furthermore I am concerned that the burdens of climate change will disproportionately affect women of colour and not be conducive to a world where existing disparities can be addressed. Climate change will implicitly affect women and children of colour living in areas susceptible to the impacts climate change more than any other socially salient group. In times of crisis, people of colour suffer disproportionate effects due to weaker structural support systems, which in turn disproportionately affects women of colour as predominant bearers of familial responsibility. In areas afflicted by poverty, this lack of a

safety net/ welfare leaves these disadvantaged people with restricted options for subsistence.

7. I believe that mitigation of climate change is not charity but a duty. As a woman of colour living in the UK it is unsettling to know that our actions are negatively contributing to an environment that will be far more dangerous in more vulnerable parts of the world which are susceptible to increasingly intensifying natural disasters. I believe in human rights, I believe in the right to raise a family without having to seriously question the quality of life my children or grandchildren may have. Many women of colour, with restricted access to sexual health education and resources, don't have a choice in having children. When having children limits your labour potential and social mobility, you are more susceptible to the effects of climate change and thus I feel I must represent these people; these women and children who are and continue to be disproportionately impacted.
8. We owe it to these young women, the bearers of future generations, to not impose unfair, preventable conditions on them and their children. Particularly those who live in poverty right now, those who are already suffering the effects of climate breakdown and ensuing displacement; we can see their plight and we have a duty as moral, autonomous peoples to not ignore them. Young women of colour will bear the brunt of climate change and considering existing disparities; wage gaps, health provisions etc. It is vital those who are affected most are given thought when deciding the extent to which we have responsibility to mitigate climate change.
9. Turning more specifically to the 2050 carbon target in the UK under the 2008 Act, I am concerned that the government is failing to set a target that is consistent with science and international law simply because it will be challenging to achieve. In my opinion, that is the wrong message to send out, both to industry and to young people. I am concerned that the divergence of approach to reviewing the carbon target in Scotland exposes a lack of political commitment on the part of the UK.
10. Finally, I am concerned that current climate targets are inconsistent with safeguarding human rights, given the impact that the effects of climate change are likely to have on health, water and subsistence. I have been reading the publications produced by the Committee on Climate Change, I am actively debating climate policy and its related ethics in academic settings, and I have participated in a workshop on the proposed

Scottish Climate change bill on behalf of Plan B. I wholeheartedly believe that a proper review of climate change targets is in the best interests of the UK.

11. It is for these reasons that I decided to bring this claim for judicial review as a co-claimant.

Costs

12. 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.

13. 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 have no option but to 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 has provided me with an indemnity in respect of any such costs if they cannot be funded by Crowdfunding.

14. 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 Maya Yasmin Campbell

Maya Yasmin Campbell

Dated 5/12/2017