

Claimant
M Doolub
First
5 December 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

FIRST WITNESS STATEMENT OF MAYA DOOLUB

I, Maya Doolub, [REDACTED]

[REDACTED] SHALL SAY AS FOLLOWS:-

1. I am the Founder and Director of Elms Consulting, a consultancy focused on sustainable development and health and well-being. Much of my work focuses on developing and implementing solutions to climate change for small island developing states, which bear the brunt of the impacts of climate change.
2. My family comes from Mauritius and I am on the Board of a number of NGOs concerned with the needs of small island developing states. It is critical to me, as a mother and grandmother, and as a daughter of parents that come from a small island, that we all assume responsibility for the catastrophic events we see happening on islands as a result of climate change, and for increased resilience of islands for future generations. It is for these reasons that 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 (the "Secretary of State") for failing to revise the UK's carbon target pursuant to his powers under the Climate Change Act 2008.
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, and I have endeavoured to explain the bases of those opinions.

My background and my reasons for supporting the challenge

4. I consider climate change to be the greatest challenge facing humanity, and an urgent and immediate threat to island states and my family in Mauritius. I would like to provide some brief context for the 1.5°C temperature goal set out in the Paris Agreement, which is relevant to the issues in these proceedings.
5. In 2008, the Alliance of Small Island States ("AOSIS") commissioned a study from the Potsdam Institute for Climate Impact Research on the consequences of a 2°C temperature rise. The research revealed that 2°C warming would be catastrophic

for many island nations (this is referred to in an article in *Climate Change News* on 10 December 2015 and entitled "A brief history of the 1.5C target").

6. In 2009, at the UNFCCC talks in Copenhagen, the Government of Tuvalu, with support from AOSIS and the governments of many African nations, led calls for formal recognition of a 1.5°C limit. In the face of opposition, President Mohamed Nasheed of the Maldives asked:

"How can you ask my country to go extinct?"

7. In Paris, at COP21, the call from the islands states was "1.5 to stay alive!". This neatly sums it up. If global warming exceeds 1.5°C, it is my view that there is a serious risk that whole countries are going to disappear beneath the waves. Thankfully, the parties at COP21 adopted the 1.5°C temperature limit. The UK Government played an important part in securing this Agreement.
8. If the Agreement is not honoured my homeland is in grave jeopardy. It hardly seems appropriate to express a tragedy of such magnitude in legal terms. But I can imagine no greater interference with my right to private and family life than devastation to loss of the country of my parents, and the destruction of my heritage.
9. I am deeply concerned that the Secretary of State has decided to retain a carbon target for 2050 in full knowledge that it is inconsistent with limiting warming to 1.5°C - inconsistent, that is, with a sustainable future for my homeland. I cannot accept that the Secretary of State has determined the challenge "too difficult" or "unfeasible". If an international "climate leader" such as the UK Government is not even aiming for the survival of vulnerable island states, then their fate is sealed. Despite Mauritius not being a significant polluter, we continue to suffer with violent cyclones and increased coastal erosion.
10. It is for these reasons that I decided to bring 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

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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 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.
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.

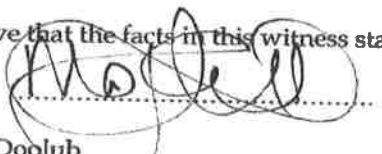
STATEMENT OF TRUTH

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

Signed

Maya Doolub

Dated


5th Dec 2017