

Claimant  
PO Palmano  
First  
5 December 2017

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

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FIRST WITNESS STATEMENT OF PARIS ORA PALMANO

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I, PARIS ORA PALMANO, of [REDACTED]

SHALL SAY AS FOLLOWS:-

1. I am a student at the University of Sussex, where I study International Development with Arabic. Outside university, I have worked as a field operative on a number of humanitarian projects since 2014.
2. I make this statement in support of the claim for judicial review brought by Plan B. Earth ("Plan B"), others and myself 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.
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. For the last few years I have worked on a number of projects in a humanitarian capacity: from disaster response, relief and recovery after the Nepal earthquake of 2014; to field co-ordination in Moria refugee registration centre and transit camp in the winter of 2015. Through this exposure I have witnessed extreme human suffering first hand. Through my research and understanding of the impacts of climate change in my degree, I believe there to be a direct correlation between increased environmental degradation and human suffering. My ultimate goal is to contribute to the relief of human suffering in whichever capacity I can be most useful. In light of advances in the scientific consensus on climate change, I feel compelled to take action to protect not only my own right to life, but also the rights of voiceless people across the world.
5. I am deeply concerned that my government - despite having, in my opinion, the financial and technical ability to truly lead the world in this area - remains reluctant to take a significant step towards effective climate change mitigation. In my belief, my government's failure to set a target that is consistent with the scientific consensus and international law will only help lead the world on to a path of catastrophe and engender suffering on a scale as yet unseen by human kind.

6. I have been following the UK's actions in respect of the carbon target under the Climate Change Act 2008 and believe our current targets are totally insufficient and will lead to unprecedented suffering. I have been passionate about the effective mitigation of climate change for a number of years and have been involved in relevant campaigns, actions and protests.
7. We are in this urgent situation only because governments have delayed taking the necessary action for so long. Delay simply passes an increased burden on to the younger generation and generations to come. As I see it, the Government's approach of delaying revision of the carbon target unfairly discriminates against the young - myself included.
8. Given the government's current stance, I believe the time has now come for strategic legal action.

#### **Costs**

9. 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. 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 crowd-funding on the Crowd Justice 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 crowd-funding.

10. 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 *Paris Ora Palmano*.....

Paris Ora Palmano

Dated *5/12/2017*.....