

Claimant
R Nakandi

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 ROSE NAKANDI

I, ROSE NAKANDI, of [REDACTED] SHALL SAY AS FOLLOWS:-

1. I was born in Uganda and am a health support worker currently pursuing a Higher National Diploma course. I now live in London in social housing with my 9 year-old son, Samuel. I am concerned about climate change both for my mother in Uganda and for me and Samuel here in the UK.
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.
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. Living in London people talk about the weather but do not usually take it too seriously. It is different in Uganda. Lots of people in Uganda are farmers. If there's a drought, they go hungry. The climate is changing in Uganda. There is now more drought and flooding than before. When it rains it rains too hard. When it's hot it's too hot and all the crops dry out, and people really suffer.
5. More and more people are coming to Uganda from neighbouring countries in East Africa such as Sudan, Somalia and Ethiopia. The drought is worse in those places. Climate change is making people leave their homes. Farmers who can't grow food are leaving for the cities, which is expensive for them and badly affects their families.
6. I feel lucky to live in London, but the situation for us is not easy. Last year Samuel and I were made homeless because I could not afford the payments on our flat. We were housed in a Bed & Breakfast for more than two months, and then moved to a local authority hostel. We have just been moved to a one-bedroom flat.
7. Whether in East Africa or London, more and more people are being displaced. Climate change is making things worse. Climate change causes more immigration into Europe,

which make life harder for immigrants who are already here. It is always hardest for the poorest.

8. I am supporting this case for my family in Uganda and for my own future and for Samuel. I do not want Samuel to grow up in a world where it is harder and harder to live.
9. In my view, the UK government knows what it needs to do, so it should do it. If it is too difficult for the UK to honour its international obligations then how are poorer countries like Uganda going to do it?

Costs

10. 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.
11. 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. 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 

Rose Nakandi

Dated 5th Dec 2017