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The Value of Climate Change-Impacted Litigation: An Alternative Perspective on the Phenomenon of 'Climate Change Litigation'

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*The Value of Climate Change-Impacted Litigation: An Alternative Perspective on the Phenomenon of 'Climate Change Litigation'**

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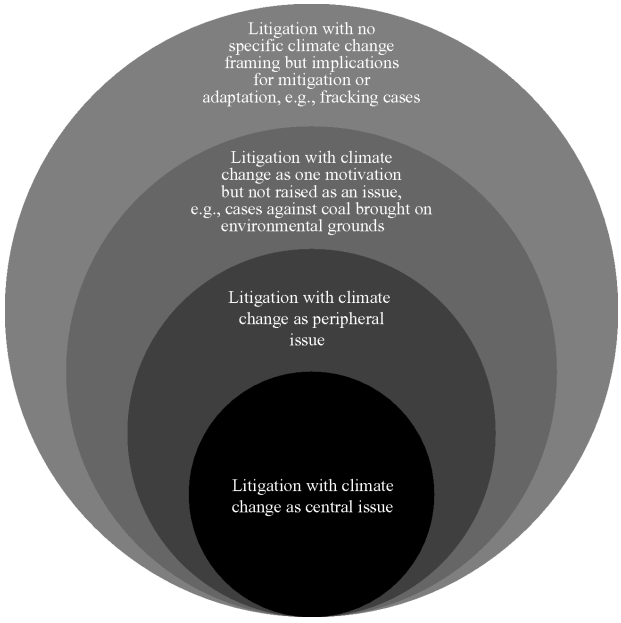
'Every act and decision […] and indeed every piece of legal research, bears the responsibility of capturing the future' (Philippopoulos-Mihalopoulos, 2017, 152-3).

I. The various conceptualizations of 'climate change litigation'

Setzer and Vanhala's systematic review of climate change litigation research (2019) has provided us with an excellent opportunity to reflect on what is referred to as 'climate change litigation'. In their comprehensive review they confirmed something that becomes evident when working on the topic: 'There are as many understandings of what counts as "climate change litigation" as there are authors writing about the phenomenon' (Setzer/Vanhala 2019, 3). Given that it is apparently difficult to reach an overarching definition and, considering the imperative need of methodological coherence, the plethora of papers devoted to assessments of climate change litigation rely on 'ad hoc' definitions. That is to say, authors implicitly or explicitly define the term in a way useful to select relevant cases for the envisaged objective of each particular research. Thereby, different parameters for what counts as climate change litigation are set.

To mention some examples: Markell and Ruhl (2012), with the aim of assessing the (broad) scope of climate change litigation and the respective role of courts in the United States, adopted a definition which includes only litigation 'in which the party filings or tribunal decisions directly and expressly raise an issue of fact or law regarding the substance or policy of climate change causes and impacts'. Peel and Osofsky (2015), for their part, focusing on the links between litigation and regulation, decided to use a broader definition which includes cases that – without addressing the topic in explicit terms – have any impact on the issue. Interestingly, they illustrate their conceptualization as several concentric circles distinguished according to the degree of relevance of climate change in the case:



Source: Peel and Osofsky (2015)

* The authors are very grateful for the stimulating environment they experienced as visiting researchers at SCELG, which inspired not only their PhD research, but also this joint contribution.

The variety of ways to define and measure the term apparently results in a difficult research landscape for further (comparative) studies. It is illustrative that the climate change litigation databases, such as those of the Sabin Center for Climate Change Law or the Grantham Research Institute on Climate Change and the Environment, identify around 1.400 cases. A broad range of judicial and quasi-judicial cases can be found among them without any discernible distinct feature, besides its – sometimes quite questionable – relationship of any kind with the climate change issue. Without denying a natural heterogeneity of this phenomenon, which can include different actors involved in different forms of proceedings, claiming different remedies on different grounds, the conceptual boundaries of climate change litigation seem to be blurry.

Setzer and Vanhala (2019) understand that the need for an overarching definition does not exist as long as each research has a clear and transparent 'ad hoc' conceptualization. This may be true. However, we think that there is some space for a more extensive reflection on the idea of defining or measuring a phenomenon within this vast body of cases, specifically around the question of what makes climate change litigation different to other forms of litigation. In this sense, is it possible to identify features in cases that are clearly differentiable and unique among all kind of litigation?

To our knowledge, this specific issue has not yet been given a great deal of attention. In the following subsections we want to first introduce the perspective of 'climate change-*impacted* litigation' and our view of how it looks like and, secondly, discuss the possible value of this new perspective.

II. An actual climate change-impacted litigation

If we assume that the climate crisis is different than past environmental issues and that it is 'legally disruptive' in nature (Fisher et al, 2017), it is logical to ask if and how this differentiation and particular nature affects the law and related processes. In this sense, what is 'new' in litigation since climate change became an issue? What are the features that differentiate climate change litigation from other environmental litigation or, in fact, any other litigation?

In consequence to the fact that adjudication plays an important role in incorporating a complex problem like climate change into the legal order (Fisher/Scotford 2016, 4), it seems reasonable to ask firstly about the special features of climate change. Thus, a new way of thinking about 'climate change litigation' could be to consider that litigation in which the particular features of climate change are expressed and prominent – in our words 'climate change-impacted litigation'. These features, challenging the law in its status quo, may be captured in the reflection of:

- its fundamentally global nature,
- its intergenerational dimension,
- the blurring line between tortfeasor (contributing to the problem) and victim (suffering its adverse impacts),
- its cause being a crucial foundation of modern society and economy,
- the threat's existential nature for humankind and its environment.

While we aim to provide a meaningful impetus here, we have to constrain ourselves to giving some relevant examples.

1. The unique feature that local emissions have impacts on the whole planet and each of its inhabitants (**'fundamentally global nature'**) has consequences for litigation. As a challenge to legal frameworks, it entails a focus in litigation on issues of jurisdiction and attribution, but can also affect standing before courts. How can local jurisdiction be established in a case against 'global carbon majors' whose activities affect the entire human population? And how can local damages or the impairment of rights be attributed to their individual and particular emitting activity?

> *Even accepting the allegations of the Complaint as true and construing them in the light most favorable to Plaintiffs, it is not plausible*

> *to state which emissions—emitted by whom and at what time in the last several centuries and at what place in the world—"caused" Plaintiffs' alleged global warming related injuries. Thus, Plaintiffs have not and cannot show that Defendants' conduct is the "seed of [their] injury." To the contrary, there are, in fact, a multitude of "alternative culprit[s]" allegedly responsible for the various chain of events allegedly leading to the erosion of Kivalina."*
>
> *(Native Village of Kivalina et. al. v. ExxonMobil Corp. et. al., US District Court for the Northern District of California, Oakland Division, 30 September 2009, page 20)*

The latter question in particular provokes a stronger linkage between law and science. There are legal and non-legal challenges to overcome when courts are asked to adequately assess the complex scientific foundation of claims, although this assessment is generally decisive for the success of this type of litigation and it may require judges apply global perspectives. This global perspective may be reflected in the application of the 'global carbon budget approach' in *Gloucester Resources Limited v. Minister for Planning* concerning the permit for a new coal mine in Australia, or the parallel assessment of a company's emissions in Europe and climate change impacts on a Peruvian glacial lake in *Saúl Luciano Lliuya v. RWE AG*.

Potential for innovation also comes from the extensive consideration of climate cases in other jurisdictions that several courts have conducted (e.g. *Gloucester Resources Limited v. Minister for Planning, Thomson v. Minister for Climate Change Issues, Juliana et. al v. United States of America et. al*). These 'judicial dialogues' among domestic courts in different countries are as exceptional as they are formative.

Seen from an individual perspective, the global nature of the problem can also cause difficulties with regard to the 'business-as-usual' application of rules on standing of claimants. The outcome may challenge litigants and judges to reflect on pathways to adjust the application in the context of climate change. Regarding the application of the *Plaumann*-formula in *Carvalho and Others v. The European Parliament and the Council* the General Court has stated:

> *According to settled case-law, natural or legal persons satisfy the condition of individual concern only if the contested act affects them by reason of certain attributes that are peculiar to them or by reason of circumstances in which they are differentiated from all other persons, and by virtue of these factors distinguishes them individually just as in the case of the addressee.*
>
> *[…]*
>
> *However, the fact that the effects of climate change may be different for one person than they are for another does not mean that, for that reason, there exists standing to bring an action against a measure of general application.*
>
> *(Carvalho and Others v. The European Parliament and the Council, General Court of the European Union, 8 May 2019, Case T-330/18, paras. 45, 50)*

Considering the same issue, however, with a different perspective:

> *The government contends these injuries are not particular to plaintiffs because they are caused by climate change, which broadly affects the entire planet (and all people on it) in some way. According to the government, this renders plaintiffs' injuries nonjusticiable generalized grievances […] The government misunderstands the generalized grievance rule […] 'the fact that a harm is widely shared does not necessarily render it a generalized grievance.'*
>
> *(Juliana et. al v. United States of America et. al., US District Court for the District of Oregon, Eugene Division, 10 November 2016, page 20)*

2. The permanence of the effect on the environment (**'intergenerational dimension'**) engenders many aspects, among them the focus on long-term consequences and on the relationship between current action or omission and the life of future generations. This latter (predominantly ethical) concern is not only a major driver of litigation, but it deeply influences the legal disputes. On the one hand, it is worth highlighting the emergence of a new actor in litigation, the 'future generations', legally (or figuratively) represented in different forms: by NGOs (e.g. Urgenda), by children, teenagers and youths (e.g. *Juliana et. al. v. United States of America et. al*, *Futuras Generaciones v. Colombia, Ali v.*

Federation of Pakistan), or even by a recognized climate scientists as 'guardian for future generations' (*Juliana et. al. v. United States of America*). This raises procedural questions on standing and representation before the courts that the law has to deal with. On the other hand, this intergenerational dimension challenges litigants to develop their ingenuity by creating new tools (e.g. deriving new rights) or reinterpreting old ones in order to translate the ethical issue into legal terms. Notably, this is the case of the 'public trust doctrine' (applied to an 'atmospheric trust') and the right to "a climate system capable of sustaining human life" in the *Juliana* case. We may also see this with regard to the reinforced application of general principles or concepts of environmental law, such as the sustainable development or intergenerational equity. Everything – including the reception in recent judgments – seems to indicate that this trend will further increase.

> *[…] there is distributive inequity in the distribution of the benefits of the Project (which are largely economic benefits) and the burdens or costs of the Project (such as the environmental, social and economic costs). […] The distributional inequity is also between the present and future generations (inter-generational equity), such as by groups within the current generation receiving economic benefits but future generations experiencing environmental costs […]*
>
> *(Gloucester Resources Limited v. Minister for Planning, Land and Environment Court New South Wales, 8 February 2019, para. 669)*
>
> *Due to this principle of fairness, the State, in choosing measures, will also have to take account of the fact that the costs are to be distributed reasonably between the current and future generations. If according to the current insights it turns out to be cheaper on balance to act now, the State has a serious obligation, arising from due care, towards future generations to act accordingly.*
>
> *(Urgenda Foundation v. The Netherlands, The Hague District Court, 24 June 2015, ECLI:NL:RBDHA:2015:7196, para. 4.76)*
>
> *Sustainable development is at the same time integrally linked with the principle of intergenerational justice requiring the state to take reasonable measures protect the environment "for the benefit of present and future generations" and hence adequate consideration of climate change. Short-term needs must be evaluated and weighed against long-term consequences.*
>
> *(Earthlife Africa Johannesburg v. The Minister of Environmental Affairs, High Court of South Africa Gauteng Division, 8 March 2017, Case 65662/16, para. 82)*
>
> *Exercising my 'reasoned judgment,'… I have no doubt that the right to a climate system capable of sustaining human life is fundamental to a free and ordered society. Just as marriage is the "foundation of the family," a stable climate system is quite literally the foundation "of society, without which there would be neither civilization nor progress.*
>
> *(Juliana et. al v. United States of America et. al., US District Court for the District of Oregon, Eugene Division, 10 November 2016, page 32)*

3. The fact that everyone is contributing to the climate change problem, albeit in varying degrees, and that simultaneously everyone will suffer its consequences, although again with (crucial) variations in degrees or severity (**'blurring line between tortfeasor and victim'**), can create difficulties for courts, which may be inclined to reject claims due to rather general concerns about separation of powers or rather technical concerns with regard to causation.

> *Everyone has contributed to the problem of global warming and everyone will suffer the consequences — the classic scenario for a legislative or international solution.*
>
> *(City of Oakland v. BP, United States District Court for the District of Northern California, 25 June 2018, p. 12.6-7)*
>
> *The pollutants, which are emitted by the defendant, are merely a fraction of innumerable other pollutants, which a multitude of major and minor emitters are emitting and have emitted. Every living person is, to some extent, an emitter. In the case of cumulative causation, only the coaction of all emitters could cause the supposed flood hazard. The past and future greenhouse gas emissions by the defendant could not hypothetically be omitted from the equation without the supposed flood hazard being eliminated as a result.*
>
> *(Lliuya v. RWE, District Court Essen, 15 December 2016, p. 7)*

4. The IPCC made it clear that to address climate change adequately, immediate, profound and extensive transformations in economic processes and societal life are necessary (IPCC Special Report, 2018). The fact that activities connected to the emission of greenhouse gases resemble a foundation in current societal and economic life ('**cause being a crucial foundation of modern society and economy'**) is reflected in litigation.

> *With respect to balancing the social utility against the gravity of the anticipated harm, it is true that carbon dioxide released from fossil fuels has caused (and will continue to cause) global warming. But against that negative, we must weigh this positive: our industrial revolution and the development of our modern world has literally been fueled by oil and coal. Without those fuels, virtually all of our monumental progress would have been impossible. All of us have benefitted. Having reaped the benefit of that historic progress, would it really be fair to now ignore our own responsibility in the use of fossil fuels and place the blame for global warming on those who supplied what we demanded? Is it really fair, in light of those benefits, to say that the sale of fossil fuels was unreasonable?*
>
> *(City of Oakland v. BP, United States District Court for the District of Northern California, 25 June 2018, p. 8.15-23)*

It particularly calls attention to the legitimacy of the actors driving these transformations and the role of law. Courts in climate change related cases increasingly engage with the design of such transformations, e.g.:

> *[I]t is not necessary to approve the Project in order to maintain steel production worldwide. The GHG emissions of the Project cannot therefore be justified on the basis that the Project is needed in order to supply the demand for coking coal for steel production.*
>
> *(Gloucester Resources Limited v. Minister for Planning, Land and Environment Court New South Wales, 8 February 2019, para. 549)*
>
> *As no substantial work has been done to implement the Framework by the Government, and realizing that its effective and immediate implementation is necessary for the protection and safeguard of the fundamental rights of the people, this Court constituted Climate Change Commission ("CCC") vide order dated 14.09.2015 in the following manner: […]*
>
> *(Leghari v. Pakistan, Lahore High Court, 25 January 2018, para. 13)*

Consequentially, the role of courts as legitimate actors contributing to the design of transformations is being questioned. This is reflected in the application of the 'political question doctrine' or, more generally, of the principle of separation of powers or in democracy arguments. In this sense, the climate issue pushes the boundaries in terms of the involvement of legal actors in societal transformation processes.

> *Whether Norway is doing enough in the environmental and climate area and whether it was prudent to open fields so far north and east are questions that involve overall assessments which are better evaluated through political processes that the courts are not suited to reviewing.*
>
> *(Greenpeace Nordic Ass'n and Nature and Youth v. Ministry of Petroleum and Energy, Oslo District Court, 4 January 2018, p. 30)*
>
> *It seems a near certainty that judgments in favor of the plaintiffs who have brought similar nuisance claims based on identical conduct (let alone those plaintiffs who have yet to file suit) would make the continuation of defendants' fossil fuel production "not feasible." This order accordingly disagrees that it could ignore the public benefits derived from defendants' conduct in adjudicating plaintiffs' claims. In the aggregate, the adjustment of conflicting pros and cons ought to be left to Congress or diplomacy.*
>
> *(City of Oakland v. BP, United States District Court for the District of Northern California, 25 June 2018, p. 14.2-6)*
>
> The State argues that for this reason the system of the separation of powers should not be interfered with, because it is not up to the courts but to the democratically legitimised government as the appropriate body to make the attendant policy choices. This argument is rejected in this case, also because the State violates human rights, which calls for the provision of measures, while at the same time the order to reduce emissions gives the State sufficient room to decide how it can comply with the order.

> *(Urgenda Foundation v. The Netherlands, The Hague Court of Appeal, 9 October 2018, ECLI:NL:GHDHA:2018:2610, para. 67)*

5. As regards the severity of the issue (**'The threat's existential nature for humankind'**), courts have been inclined to reconsider existing legal standards or apply them in a way to be able to assess the issues that concern climate change due to the exceptional nature of the problem.

> Without a healthy environment, subjects of law and living beings in general will not be able to survive, let alone to protect those rights for our children or for the future generations. Neither will it be possible to guarantee the existence of the family, the society or the state itself.
>
> […]
>
> Therefore, in this case, it is sufficiently proven that the action of protection [acción de tutela] must exceptionally proceed in order to solve the core issues of the presented problem.
>
> *(Future Generations v. Ministry of the Environment and Others, Supreme Court of Colombia, 5 April 2018, p. 13)*

There are many more examples of how the nature of climate change is stimulating legal or judicial innovation and, at the same time, potentially questioning and sometimes changing the role and shape of the law. This climate change-impacted litigation has, for example, animated a dynamic between tort law and public law, as seen in the *Urgenda* case or even earlier described by Kysar (2011). The list of features is not necessarily conclusive. In particular, there might be nuances of the mentioned features that differ from the proposed form that is presented here. That could, for example, be said about the 'super-wickedness' (Lazarus 2009, Levin et al, 2012) or 'hotness' (Fisher et al, 2017) that has been attached to the problem of climate change, comprising several features that – although expressed in a different manner – overlap or coincide with the features identified here.

In any case, for the unique relationship between climate change, litigation and change in law, cases reflecting the exemplified features can be differentiated from other litigation, which will not, or will only sporadically demonstrate the mentioned elements and will not impact the development of law in a comparable manner. Although, some of the presented features have already been discussed with a view to litigation and the opportunity of judicial innovation – e.g. by Peel (2011) –, they have not particularly been conceived in the sense of drivers of changes in law facilitated through climate change litigation.

III. Why do we think that such further differentiation could be useful?

The rationale of our proposal can be explained as follows: recognizing 'climate change-impacted' litigation is relevant because it allows us to focus on those cases which reveal how the law is affected and how it responds to the challenges of the climate crisis, a crisis which is, arguably, the paradigmatic sign of a new epoch: the Anthropocene (Crutzen and Stoermer, 2000). Our proposal is in line with the contribution of Fisher et al (2017) to demonstrate why and how 'legal issues arising from climate change cannot be addressed through the conventional application of legal doctrine' as well as further 'identify and explore the legally disruptive nature of climate change'. Identifying 'climate change-impacted' cases would give us a complex group of cases which guide better understanding of how this litigation may contribute to develop the law in the face of new disruptive challenges.

In other words, a rather restricted number of cases, in which the nature and complexities of climate change are expressed and have an impact on the elements of the legal dispute, can better capture the relevant fact that this 'wave of litigation' is actually contributing to the progressive development of the law. By promoting the ingenuity of litigants and judiciaries, only this litigation, and not any litigation somehow related to the topic, plays an important role in adapting law to the complexity of the socio-ecological crisis.

Cases with implications for mitigation or adaptation that do not contain a specific discussion of the particular features of climate change – the external circles in Peel and Osofsky's figure – are not part of this category. This effort of definition is not delimiting litigation according to its value in tackling the climate crisis, but it is primarily trying to identify, at least for theoretical and methodological reasons, something unique called 'climate change-impacted litigation'. We are far from the, as she expresses it, "unashamedly instrumental" approach taken by Bouwer (2018, p. 3) who convincingly argues in favor of paying more attention to the impact of "litigation occurring in the context of climate change" in order to develop truly strategic litigation. While this approach is interested in the benefits of litigation as a tool to tackle or address the climate crisis, our approach seeks to give some more clarity for future research on how climate change is pushing the boundaries of law and, as a consequence, driving its practice through its agents (lawyers, judges, academics, etc.), to address the challenges of a new reality of risk and uncertainty.

A more clear and transparent notion of the linkage between the problem and its reflection in judicial procedures enables better assessment of how legal actors are actually dealing with the problem. On the practical side, the features of climate change have an impact on the way in which legal action is built, how judges think and adjudicate. Further reflection on this linkage can help judges, but also civil society, make better (more suitable) use of the legal instruments. At least it would strengthen the awareness of the adequacy or inadequacy of existing legal frameworks governing the proceedings and its content.

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