



TRANSPARENCY INTERNATIONAL - PAKISTAN

June 04, 2025

Principal Secretary to PM
Prime Minister House
Islamabad

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TL2025/0604/1A

(For the attention of Honorable Prime Minister)

Subject: Transparency International's Global Recommendations for COP30: Focusing on Integrity Reforms in Global Climate Negotiations under the UNFCCC

Dear Sir,

In 2024 the planet crossed the 1.5 C global warming limit for the first time, recording the hottest year in history. Transparency International has been advocated for strengthening transparency and integrity in the global climate negotiation process under the United Nations Framework Convention on Climate Change (UNFCCC).

To achieve this, Transparency International has proposed that the following measures be implemented voluntarily by the upcoming COP Presidency in the short-term, and formally by the UNFCCC in the long-term (Transparency International Open Letter to UNFCCC and COP30 Presidency is enclosed as (Annex-A)

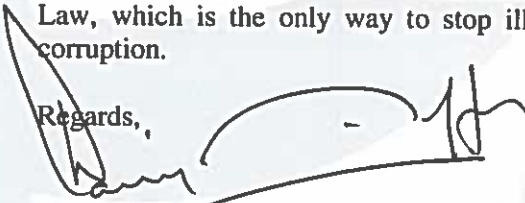
1. Conflict of Interest Policy
2. Transparency Standards
3. Host Country Agreements (HCAs) & Partnerships
4. Reformed COP Presidency Selection

In support of this initiative, Transparency International is seeking the support of the Governments across the world to inform key dialogue and intergovernmental discussions on the recommendations including at the upcoming UNFCCC intersessional (SB 62) in Bonn, Germany (June 2025). In this regard, Transparency International Pakistan is pleased to share the briefing for the governments released by Transparency International (Annex-B).

As Pakistan has consistently advocated for equity, fairness, and ambition at international climate forums. By supporting these integrity reforms, Pakistan can further reinforce its position as a leader in climate diplomacy and governance.

Transparency International Pakistan is striving for across-the-board application of the Rule of Law, which is the only way to stop illegal practices and achieve Zero tolerance against corruption.

Regards,


Advocate Daniyal Muzaffar,
Trustee/Legal Advisor
Transparency International Pakistan

Copies forwarded for the information with a request to take action under their mandate to:

1. Minister, Ministry of Climate Change and Environmental Coordination, Islamabad
2. Secretary, Ministry of Climate Change and Environmental Coordination, Islamabad

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OPEN LETTER TO UNFCCC AND BRAZILIAN COP30 LEADERSHIP TO ADDRESS FOSSIL FUEL LOBBY INFLUENCE

18 March 2025

Dear Luiz Inácio Lula da Silva, President of Brazil; Dear André Aranha Corrêa do Lago, President of COP30; Dear Ana Toni, CEO of COP30

Dear Simon Stiell, Executive Secretary of the United Nations Framework Convention on Climate Change (UNFCCC)

In 2024 our planet [crossed the 1.5 C global warming limit](#) for the first time, recording the hottest year in history. From devastating wildfires in Los Angeles, to [catastrophic floods in Brazil](#) and South Asia, to [droughts in the Amazon](#) and [Central Africa](#) - we are entering a perilous new reality that demands urgent climate action. However, for too long, fossil fuel [lobbyists have swarmed COPs](#), the annual global climate negotiations. Together with other high polluting industries (for example, in Brazil, from the agrobusiness sector) they have been delaying progress for phasing out fossil fuels, reducing emissions, and to protect the health, wellbeing and livelihoods of communities. As global temperatures edge to irreversible tipping points, we cannot afford this anymore.

Today, we - a coalition of organizations, advocates, and citizens who believe that transparency and accountability are essential for meaningful climate action - are calling on the Brazilian COP30 Presidency and the UNFCCC to confront high-polluting industries' undue influence in climate negotiations and restore trust in the COP process.

Brazil's leadership presents a unique opportunity to reset the course of climate diplomacy. We welcome the government's ambition for COP30 to set higher standards, and its [plans for holding a "Global Ethical Stocktake"](#). We call on the Brazilian Presidency to organise the Stocktake by the June 2025 climate meetings in Bonn, with sessions on undue influence, conflicts of interests (see for example [Accountability Framework](#)) and COP Presidency selection, with recommendations for reforms to future COPs.

The following measures should be implemented voluntarily by the Brazilian COP Presidency in the short-term, and formally by the UNFCCC in the long-term:

1. **Conflict of Interest Policy:** Fossil fuel and high polluting industry lobbyists should no longer be shaping negotiations. We call for their exclusion from state delegations and the adoption of a robust conflict of interest framework for all COP participants. We encourage

the Brazilian Presidency to take voluntary measures for its own Delegation and Presidency Team and urge the UNFCCC to adopt policy reforms binding future COPs.

2. **Transparency Standards:** All delegations, lobbyists, and COP organisers should always publicly declare their true (and multiple if relevant) affiliations at COPs, with this information displayed on a centralised, publicly accessible platform. We call on the UNFCCC to address gaps by adopting an appropriate transparency policy within its code of conduct, and work with the Brazilian Presidency to ensure higher standards for COP30.
3. **Host Country Agreements (HCAs) & Partnerships:** COP Presidency partnerships with high polluting industries should end. HCAs should be conditional of UNFCCC approval based on clear selection criteria of partners explicitly excluding fossil fuels and other high polluting industries. HCAs and related partnerships need to be timely published on the Secretariat's website.
4. **Reformed COP Presidency Selection:** Future COP hosts should demonstrate tangible progress on Paris Agreement in national climate action plans and commitment to human rights. COP Presidencies should be free of lobbyists from high polluting industries. The UNFCCC needs to adopt a process for this.

A transparent, accountable framework that prioritizes people over polluters will rebuild trust in the COP process and accelerate progress toward the Paris Agreement goals. Without these reforms, global climate diplomacy risks remaining a hollow exercise, incapable of addressing the most urgent crisis of our time.

We urge the Brazilian Presidency to act quickly by organizing the Global Ethical Stocktake and implementing possible voluntary measures on (1) Conflicts of Interest and (2) Transparency Standards. We call on all Parties and the UNFCCC Secretariat to adopt reforms for permanent policy changes in all the above points. COP30 is more than just another summit - it is a test of the global community's will to confront the climate crisis with integrity and ambition. **We urge you to act.**

Sincerely,

Briefing for governments to address the undue influence of big polluters in global climate talks

The undue influence of fossil fuel and high polluting industries in global climate talks undermines climate action. The United Nations Framework Convention on Climate Change (UNFCCC) gives the framework for organizing the Conference of the Parties (COPs). The UNFCCC does not have sufficient integrity measures for addressing the **undue influence of high polluting industries in COPs**. They are **present in large numbers** among **State Delegations**, accredited **observers** and in the **COP Presidency Teams**. Until this is addressed, COPs will fail to truly respond to the climate crisis, and trust in COPs will continue to erode. To change this, **your government (as a State Party to UNFCCC) should:**

- 1) At the inter-sessional [meeting SB 62 in June 2025 in Bonn](#), in inter-governmental **discussions** and negotiations your government should **propose and/or support integrity measures to be adopted by UNFCCC**, for addressing undue influence of big polluters at COPs. Your government publicly should support binding changes of policies on these issues.
- 2) While the first suggested point is crucial for long-term policy changes at UNFCCC and to build momentum, your government should also **pursue in parallel incremental changes to UNFCCC**, which may be more realistic to achieve by June 2025's Bonn meeting. Your government should **reach out now to the UNFCCC Secretariat** directly, asking for the below integrity measures to be adopted across **UNFCCC documents, guidelines and handbooks**, as soft/non-binding language recommendations. The exact place of the below technical integrity reforms can be flexible across UNFCCC materials or in new non-binding UNFCCC standards/guidelines/handbooks recommendations documents.

For reference, here is an [open letter by a coalition of 264 prominent organisations](#), from across the globe, urging reforms at the UNFCCC for addressing the undue influence of big polluters.

Suggested non-binding recommendations for the Government to send to UNFCCC Secretariat asking them to integrate them across UNFCCC documents. The topics of the recommendations also guide what formal policy changes your government can sponsor and support at the [SB 62 meeting in June 2025 in Bonn](#)

Definitions of conflicts of interest and of undue influence in existing documents

- The UNFCCC does not have undue influence and conflict of interest definitions for State Parties attending COPs, for accredited observers, for Host Country Agreements and for COP Presidencies. The UNFCCC Rules of Procedure; and The Guidelines on a Principle-based Approach to the Cooperation between the United Nations and the Business Sector and the Handbook for Hosting UN Climate Change conferences do not include them, nor safeguards to avoid them. Adopting definitions by the UNFCCC in UNFCCC documents is vital for recommendations that follow below.

Recommendations for the composition of Party Delegations (potential new guidelines)

- The UNFCCC Secretariat should encourage Parties to exclude lobbyists or representatives from fossil fuel and other high polluting industries from their Delegations.
- The UNFCCC Secretariat should recommend Party Delegations to voluntarily publish the representatives' declarations of financial, professional and other interests in a publicly available

machine-readable format. It should also encourage Parties to use a checklist that confirm that no such interests are represented in their Delegations, to avoid conflicts of interest and undue influence from high polluting industries.

Recommendations for non-State party observer accreditation and attendance

- The UNFCCC should recommend for accredited observers that all observers register their true affiliations and always display it during COPs (including lobbyists, employees, members of trade or professional associations and state-owned companies).
- The UNFCCC Observer Liaison Team should further improve the registration process for observers, including deleting “the Other” affiliation category behind which such industry affiliates can be hidden.

Recommendations for the selection of COP Host Countries

- The UNFCCC Secretariat should issue new guidelines/recommendations to emphasize the need for choosing host countries for COPs that (1) demonstrate commitment to- and a track record of implementation of Paris Agreement commitment goals (2) and demonstrate commitment to upholding international human rights standards.
- The already existing UNFCCC fact finding missions’ mandate to potential host countries should incorporate explicitly these considerations.

Recommendations for Host Country Agreements

- Once a host country is selected, the UNFCCC should publish the Host Country Agreement (HCA) promptly on the UNFCCC’s website in line with 2023 June guidance from the Subsidiary Body for Implementation, along with the details of all consultancies and contracts they may include by the Host Country to third parties.
- The UNFCCC should encourage host countries to also publish a draft of the HCA before it is signed, to receive feedback from Parties and civil society.
- The guidelines should call on host countries to consult the UNFCCC for the approval of external partners and consultants, and should follow the UNFCCC “process for due diligence and criteria for selection of a partner,” and include similar provisions to prevent sponsorship by entities “whose products, services or operations may negatively affect the objectives, activities or reputation of the secretariat, including but not limited to entities whose core products or core related services include fossil fuels.”
- The UNFCCC guidelines should establish recommendations for the use of the COP brand in host country initiatives and diplomacy to prevent misuse that could promote endorsement of solutions serving fossil fuel interests or policies contradicting the goals of UNFCCC and the Paris Agreement.

Recommendations for strengthening the integrity of COP Presidencies

- The existing UNFCCC Handbook for hosting COPs should stress that the COP Presidencies must be impartial, even if the appointing government has conflicting interests with science-aligned guidance for delivering the 1.5- 2 degrees Celsius goal of the Paris Agreement.
- The UNFCCC handbook and guidelines documents should encourage the disclosure of any situations or relationships, financial or otherwise, that might be perceived as affecting the objectivity and impartiality of the COP Presidency in an interest disclosure form that should be made publicly available online.

- The UNFCCC recommendations and guidelines should extend to the incompatibility of the position of COP President with any role (remunerated or not) and any holding financial or vested interests in an entity whose core products, services or operations may negatively affect the objectives, activities or reputation of the UNFCCC, including but not limited to fossil fuels.
- The UNFCCC recommendations and guidelines should encourage the public disclosure of all formal and informal meetings held in connection to the role of the presidency, with an indication of the topics addressed and attendees listed.
- The UNFCCC recommendations and guidelines should encourage COP Presidency Teams to publish the details of its contracts, partnerships and consultancies on an ongoing basis online in an easily accessible format, including the names of partners, their goal, and scope, and financial implications.