

Republic of the Philippines  
COMMISSION ON HUMAN RIGHTS  
Diliman, Quezon City

*In Re:*

*National Inquiry on the Impact of Climate  
Change on the Human Rights of the Filipino  
People and the Responsibility therefor, if any,  
of the “Carbon Majors”*

CHR-NI-2016-0001

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**EX-PARTE FORMAL OFFER OF DOCUMENTARY  
EXHIBITS AND MANIFESTATION**

Petitioners, by the undersigned Legal Representatives, respectfully offer in evidence the following documentary exhibits in support of their *Petition*:

**FORMAL OFFER OF DOCUMENTARY EXHIBITS**

<b>EXHIBIT</b>	<b>DESCRIPTION</b>	<b>PURPOSES</b>
<b>“A”</b>	Non-exhaustive List of International Human Rights Treaties Signed and/or Ratified by the Philippines	To prove that there are existing multi-faceted international human rights treaties signed and/or ratified by the Philippines, which encompass rights violated or threatened to be violated as contained in the <i>Petition</i> ; and  To prove the existence and other contents of the document
<b>“B”</b>	Cover Note from Climate Change Commission of the Office of the President of the Philippines to the	To prove the existence and contents of the document, particularly the three (3) Reports made by three (3) leading expert groups which clearly indicate that

	<p>UNFCCC dated 30 April 2015 (Re: Submission from party members to the Climate Vulnerable Forum on the 2013-2015 Review, inclusive of three independent expert reports on information gaps, a call for strengthening the long-term 2°Celsius goal to 1.5°C, and a request for an additional session under the Review prior to the next COP)</p>	<p>human interference with the climate system has the potential to endanger fundamental human rights, occupational health and productivity, and the well-being of communities, migrants and displaced people, including causing forced displacement</p>
<p><b>“B-1”</b></p>	<p>The Effects of Climate Change on the Full Enjoyment of Human Rights dated 30 April 2015 (Re: The UN Special Rapporteur on human rights and the environment on considerations on human rights; Expert Report by John Knox, et al.)</p>	<p>To show the potential threats for human rights endangerment with 2.0°C global average temperature rise;</p> <p>To show the difference between a 2.0°C and 1.5°C goal with respect to the outcomes for human rights, which include those mentioned in the <i>Petition</i>, and specifically an increase in global average temperatures of approximately 2°C will have major and predominantly negative effects on ecosystems and communities across the globe; and</p>

		To prove the existence and other contents of the document
<b>“B-2”</b>	Climate Change and Increasing Heat Impacts on Labor Productivity dated 25 April 2015 (Ruby Coast Research Centre on Labour [health and productivity] by Tord Kjellstrom et al.)	To show inputs from experts on information gaps on the issue of labor, specifically on questions regarding the potential implications of the current 2°C goal on labor and whether strengthening of this goal to 1.5°C would likely result in a different outcome for labor; and  To prove the existence and other contents of the document
<b>“B-3”</b>	Discussion Paper on the Relationship between Climate Change and Human Mobility dated 27 April 2015 by Professor Walter Kaelin, Envoy of the Chairmanship of the Nansen Initiative	To prove the relationship between Climate Change and Human Mobility (displacement, migration and planned relocation); and  To prove the existence and other contents of the document
<b>“C”</b>	Updated List of Respondent Investor-Owned Carbon Majors with Principal Business Addresses and Known Philippine Presence Based on Securities and Exchange Commission Records	To provide updated international and local addresses of respondent Carbon Majors; and  To prove the existence and other contents of the document

<p><b>“D”</b></p>	<p>Updated Details of Carbon Major Publications</p>	<p>To provide updated details of Carbon Major Publications; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“D-1”</b> (Remarked as <b>“TTTT”</b> to <b>“TTTT-1”</b>)</p>	<p>Climate Accountability Institute, Press Release on Update of Carbon Majors Project</p>	<p>See purposes in Exhibit <b>“TTTT” to “TTTT-1”</b></p>
<p><b>“D-2”</b> (Remarked as <b>“UUUU”</b> to <b>“UUUU-103”</b>)</p>	<p>Carbon Majors: Accounting for Carbon and Methane Emissions 1854-2010 Methods and Results Report</p>	<p>See purposes in Exhibit <b>“UUUU” to “UUUU-103”</b></p>
<p><b>“D-3”</b> (Remarked as <b>“VVVV”</b> to <b>“VVVV-14”</b>)</p>	<p>Tracing Anthropogenic Carbon Dioxide and Methane Emissions to Fossil Fuel and Cement Producers, 1854-2010</p>	<p>See purposes in Exhibit <b>“VVVV” to “VVVV-14”</b></p>
<p><b>“E”</b></p>	<p>Publications on Fossil Fuel Industry Involvement in Undermining Climate Science and Action</p>	<p>To provide an updated list of publications providing background on the involvement of fossil fuel industry -- either directly or through trade associations -- public relations firms, or other third-party intermediaries, in undermining action on</p>

		<p>climate change and in climate denial efforts; and</p> <p>To prove the existence and other contents of the document</p>
<b>“F”</b>	<p>Past Research on Vulnerabilities and an Overview of Existing Literature on Climate Change Impacts in the Philippines</p>	<p>To prove that the Philippines ranks among the most affected countries -- exhibiting the highest levels of vulnerability -- in terms of climate change impacts and extreme weather events. In particular, to prove that the Philippines is exposed to multiple hydro-meteorological hazards, e.g. tropical cyclones, flooding, and even droughts; and</p> <p>To prove the existence and other contents of the document</p>
<b>“F-1”</b>	<p>Background on Ocean Acidification</p>	<p>To show that ocean acidification and warming of coastal waters “will continue with significant negative consequences for coastal ecosystems,” including impacts on coral bleaching, mortality, and the balance between growth and erosion, which can potentially impact food security; and</p> <p>To prove the existence and other contents of the document</p>

<p><b>“G”</b></p>	<p>An Opinion of Center for International Environmental Law in Support of the Petitioners dated 09 February 2017</p>	<p>To prove Center for International Environmental Law’s (CIEL) support of the Petition;</p> <p>To show the impacts of climate change have already resulted in significant human rights violations within and beyond the Philippines;</p> <p>To show that potentially profound consequences on human lives and human populations were a foreseeable risk of fossil fuel combustion for many decades;</p> <p>To show that as leading producers and marketers of fossil fuels, respondent Carbon Majors had the early opportunity and capacity to identify and act on the risks of climate change;</p> <p>To show that the laws and procedures of the Philippines empower the Commission to investigate and provide recommendations to address the substantial evidence that implicates respondent Carbon Majors for their contributions to climate change;</p> <p>To provide extensive collection of correspondences, scientific research, and other documents that describe</p>
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		<p>the development of climate change knowledge and expertise since the early 1900s; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“H”</b></p>	<p>The Rise in Global Atmospheric CO<sub>2</sub>, Surface Temperature, and Sea Level from Emissions Traced to Major Carbon Producers (The study was conducted by a team of scientists from the Union of Concerned Scientists, the Climate Accountability Institute, and Oxford University) dated 23 April 2017</p>	<p>To prove that nearly two-thirds of total industrial CO<sub>2</sub> and CH<sub>4</sub> emissions can be traced to 90 major industrial carbon producers – 47 of which were impleaded as respondents herein;</p> <p>To prove that there exists a climate model to quantify the contribution of historical (1880-2010) and recent (1980-2010) emissions traced to these producers to the historical rise in global atmospheric CO<sub>2</sub>, surface temperature, and sea level;</p> <p>To prove that emissions traced to these carbon producers contributed to significant percentage increase in atmospheric carbon dioxide, Global Mean Surface Temperature (GMST), and Global Sea Level (GSL) rise -- key indicators of human impact on the global environment; and</p> <p>To prove the existence and other contents of the document</p>

<p><b>“I”</b></p>	<p>Acts of God, Human Influence and Litigation (Sophie Marjanac, Lindene Patton, and James Thornton) dated September 2017</p>	<p>To show the critical importance of new developments in attribution science to the legal duties of governments, businesses, and other sectors and individuals; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“J”</b></p>	<p>Assessing ExxonMobil's Climate Change Communications (1977–2014) (Geoffrey Supran and Naomi Oreskes) dated 23 August 2017</p>	<p>To prove that available documents have shown that there is a discrepancy between what ExxonMobil’s scientists and executives knew about climate change privately and in academic circles and what has been presented to the general public; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“K”</b></p>	<p>Smoke and Fumes: The Legal and Evidentiary Basis for Holding Big Oil Accountable for the Climate Crisis (Center for International Environmental Law) dated November 2017</p>	<p>To show essential findings and conclusions in regard to the fossil fuel industry’s notice, awareness, opportunity to act on climate risks, and documented conduct of leading investor-owned oil companies with respect to the climate science and climate risks; and</p> <p>To prove the existence and other contents of the document</p>





<p><b>“N-2”</b></p>	<p>Signature of Gerry Bagtasa, PhD</p>	<p>impacts of climate change from the observations scientifically gathered; and</p> <p>To prove the existence, due execution, and other contents of the document</p>
<p><b>“O” to “O-1”</b></p>	<p><i>Curriculum Vitae</i> of Gerry Bagtasa, PhD, consisting of 2 pages</p>	<p>To establish the credibility and expertise of Gerry Bagtasa, PhD to discuss the topic he presented; and</p> <p>To prove the existence and contents of the document</p>
<p><b>“P” to “P-9”</b></p>	<p>List of Published Papers of Gerry Bagtasa, PhD, consisting of 10 pages</p>	<p>To establish the credibility and expertise of Gerry Bagtasa, PhD to discuss the topic he presented; and</p> <p>To prove the existence and contents of the document</p>
<p><b>“Q” to “Q-16”</b></p>	<p>Printed PowerPoint presentation of Gerry Bagtasa, PhD, entitled “Role of greenhouse gases in warming the environment,” consisting of 17 pages</p>	<p>To show the role of greenhouse gases in warming the environment, explaining climate change in general, its cause and effect, and the vulnerability of the Philippines to the impacts of climate change from the observations scientifically gathered;</p> <p>To support the oral testimony of Gerry Bagtasa, PhD during the March 2018 inquiry hearing; and</p> <p>To prove the existence and other contents of the document</p>



<p><b>“S” to “S-8”</b></p>	<p><i>Curriculum Vitae</i> of Peter Frumhoff, PhD, consisting of 9 pages</p>	<p>To establish the credibility and expertise of Peter Frumhoff, PhD to discuss the topic he presented; and</p> <p>To prove the existence and contents of the document</p>
<p><b>“T” to “T-20”</b></p>	<p>Printed PowerPoint presentation of Peter Frumhoff, PhD, entitled “Climate Change from Emissions Traced to Major Carbon Producers,” consisting of 21 pages</p>	<p>To prove the rise in global atmospheric CO<sub>2</sub>, surface temperature, and sea level rise from emissions traced to major carbon producers who are respondents herein;</p> <p>To prove that the fossil fuel industry knew about the dangers of climate change;</p> <p>To prove that some engaged in climate deception;</p> <p>To support the oral testimony of Peter Frumhoff, PhD during the March 2018 inquiry hearing; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“U” to “U-2”</b></p> <p><b>“U-3”</b></p>	<p><i>Salaysay ni Gg. Felix “Ka Jhun” Pascua</i> dated 17 March 2018, consisting of 3 pages</p> <p>Signature of Gg. Felix “Ka Jhun” Pascua</p>	<p>To prove how climate change impacted the lives and livelihoods of farmers, specifically how farming cycle or cropping period changed, how little farmers were able to harvest every cropping period, how household income was severely diminished, how farmers were trapped in a vicious cycle of debt to a</p>



	<p>Precipitation and Near Surface Air Temperature in the Philippines for the Period 1951-2010 dated 05 April 2014, consisting of 15 pages</p>	<p>and daily temperature extremes reveal more hot days and fewer cooler nights versus the mean from the normal period of 1961-1990 for much of the Philippines, with the majority of these results being statistically significant;</p> <p>To prove that continued and increased exposure to the effects of a warming climate -- disrupted growing seasons, changes in the occurrence of vector-borne diseases, and the threat of severe weather events -- continues to pose a real development challenge in the Philippines; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“X” to “X-4”</b></p>	<p><i>Curriculum Vitae</i> of Ms. Rosalina de Guzman, consisting of 5 pages</p>	<p>To establish the credibility and expertise of Ms. Rosalina de Guzman to discuss the topic she presented; and</p> <p>To prove the existence and contents of the document</p>
<p><b>“Y” to “Y-27”</b></p>	<p>Printed PowerPoint presentation of Ms. Rosalina de Guzman, entitled “Observed Climate Trends and Projections in the Philippines,”</p>	<p>To prove the observed climate trends and projections in the Philippines;</p> <p>To prove increase in temperature, sea level rise, change in precipitation,</p>

	<p>consisting of 28 pages</p>	<p>and extreme weather events in the Philippines;</p> <p>To prove that the Philippines is highly vulnerable to climate change and, in fact, ranked third in the World Index Report in 2016;</p> <p>To support the oral testimony of Ms. Rosalina de Guzman during the March 2018 inquiry hearing; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“Z” to “Z-2”</b></p> <p><b>“Z-3”</b></p>	<p><i>Salaysay ni Bb. Lerissa Libao</i>, dated 17 March 2018, consisting of 3 pages</p> <p>Signature of Bb. Lerissa Libao</p>	<p>To show how extreme heat and climate change impacts lives and livelihoods of farmers and owners of small agri-business, specifically impacts on coconut plantation and vegetable farming, which are currently extremely difficult to do and unproductive;</p> <p>To support the oral testimony of Ms. Lerissa Libao during the March 2018 inquiry hearing; and</p> <p>To prove the existence, due execution, and other contents of the document</p>
<p><b>“AA” to “AA-3”</b></p>	<p><i>Salaysay ni Bb. Elma Reyes</i>, dated 17 March 2018, consisting of 4 pages</p>	<p>To show how extreme weather events and/or climate change impacted the life and livelihood of a vegetable vendor whose</p>





<p><b>“DD” to “DD-23”</b></p>	<p><i>Curriculum Vitae</i> of Maria Lourdes San Diego-McGlone, PhD, consisting of 24 pages</p>	<p>To establish the credibility and expertise of Lourdes San Diego-McGlone, PhD on the topic she presented; and</p> <p>To prove the existence and contents of the document</p>
<p><b>“EE” to “EE-29”</b></p>	<p><i>Curriculum Vitae</i> of Porfirio Aliño, PhD, consisting of 30 pages</p>	<p>To establish the credibility and expertise of Porfirio Aliño, PhD on the topic he presented; and</p> <p>To prove the existence and contents of the document</p>
<p><b>“FF” to “FF-7”</b></p>	<p>Printed PowerPoint presentation of Maria Lourdes San Diego-McGlone, PhD; Laura David, PhD; and Porfirio Aliño, PhD, entitled “How Increased CO<sub>2</sub> Affects the Oceans,” consisting of 8 pages</p>	<p>To show how climate change affects oceans, specifically how sea level rise and ocean acidification cause erosion and reduce food availability;</p> <p>To show ocean acidification trends and projections globally and in the Philippines;</p> <p>To support the oral testimonies of Maria Lourdes San Diego-McGlone, PhD; Laura David, PhD; and Porfirio Aliño, PhD during the March 2018 inquiry hearing; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“GG”</b></p>	<p>Infographic Sea-level rise and Ocean acidification</p>	<p>To show a simplified presentation of the impacts of sea level rise and ocean acidification; and</p>

		To prove the existence and other contents of the document
<p><b>“HH” to “HH-2”</b></p> <p><b>“HH-3”</b></p>	<p><i>Salaysay ni Gg. Ernesto C. Cruz</i> dated 16 March 2018, consisting of 3 pages</p> <p>Signature of Gg. Ernesto C. Cruz</p>	<p>To prove how extreme heat and other weather-related events have impacted the life and livelihood of a jeepney driver in the urban area and show the concerns of the transport sector relative to increase heat;</p> <p>To support the oral testimony of Mr. Ernesto Cruz during the March 2018 inquiry hearing; and</p> <p>To prove the existence, due execution, and other contents of the document</p>
<p><b>“II” to “II-2”</b></p> <p><b>“II-3”</b></p>	<p>Profile and Statement of Victorio B. Molina, PhD Environmental Science dated 19 March 2018, consisting of 3 pages</p> <p>Signature of Victorio B. Molina, PhD</p>	<p>To show how climate change impacts health and the vulnerability of Filipinos to these impacts; and</p> <p>To prove the existence, due execution, and other contents of the document</p>
<p><b>“JJ” to “JJ-8”</b></p>	<p>Printed PowerPoint presentation of Victorio B. Molina, PhD, entitled “Health Impacts of Climate Change,” consisting of 9 pages</p>	<p>To show how climate change affects health through different pathways;</p> <p>To support the oral testimony of Victorio B. Molina, PhD during the</p>



	<p>consisting of 9 pages</p>	<p>and willfully misled and confused the public regarding climate change and the role of the carbon majors in contributing to climate change through the study published by CIEL, entitled “Smoke and Fumes: The Legal and Evidentiary Basis for Holding Big Oil Accountable for Climate Crises”;</p> <p>To support the oral testimony of Ms. Lisa Anne Hamilton during the March 2018 inquiry hearing; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“NN” to “NN-3”</b></p>	<p>Exxon Research and Engineering Company (Corporate Research Science Laboratories) dated 02 September 1982, consisting of 4 pages</p>	<p>To prove that respondent ExxonMobil had previous communication from its Theoretical and Mathematical Sciences Laboratory and had prior knowledge about the consensus of National Research Council Panel that the doubling of atmospheric CO<sub>2</sub> from its pre-industrial revolution value would result in an average global temperature rise of <math>(3.0 \pm 1.5)^{\circ}\text{C}</math>;</p> <p>To prove that respondent ExxonMobil understood that temperature increase of this magnitude would bring about significant changes in the earth’s</p>

		<p>climate, including rainfall distribution and alterations in the biosphere; and</p> <p>To prove the existence and other contents of the document</p>
<b>“OO” to “OO-11”</b>	<p>Inter-office Correspondence dated 31 October 1977 (Re: Environmental Effects of Carbon Dioxide), consisting of 12 pages</p>	<p>To prove that there was previous communication within ExxonMobil regarding the environmental and/or climactic effects of carbon dioxide; and</p> <p>To prove the existence and other contents of the document</p>
<b>“PP” to “PP-10”</b>	<p>Carbon Dioxide Exchange Between Atmosphere and Ocean and the Question of an Increase in Atmospheric CO<sub>2</sub> during the Past Decades (by Roger Revelle and Hans Seuss) dated 04 September 1956, consisting of 11 pages</p>	<p>To demonstrate early climate research that found the average lifetime of a CO<sub>2</sub> molecule in the atmosphere before it is dissolved into the sea is of the order of 10 years, which means that most of the CO<sub>2</sub> released by artificial fuel combustion since the beginning of the industrial revolution must have been absorbed by the oceans; and</p> <p>To prove the existence and other contents of the document</p>
<b>“QQ” to “QQ-28”</b>	<p>The Climate Deception Dossiers (Internal Fossil Fuel Industry Memos Reveal Decades of</p>	<p>To prove the existence of documents of internal company and trade association that reveal a coordinated campaign underwritten by the</p>

	<p>Corporate Disinformation) by the Union of Concerned Scientists, consisting of 29 pages</p>	<p>world’s major fossil fuel companies, most are respondents herein, and their allies to spread climate misinformation and block climate action;</p> <p>To prove that there were documents that revealed respondent ExxonMobil and other powerful fossil fuel interests funded purportedly independent contrarian climate scientists for more than a decade;</p> <p>To prove that the fossil fuel industry’s own scientists were advising the risks of human-caused climate change;</p> <p>To prove why these companies must stop sowing doubt and must be held accountable for their share of responsibility for global warming; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“RR” to “RR-7”</b></p>	<p>Impact of Climate Change on Human Health by Jinky Leilanie DP. Lu [published in pp. 91-98, Volume 50, No. 2 (2016) of Acta Medica Philippina], consisting of 8 pages</p>	<p>To prove the adverse effects of climate change to human health, specifically increasing the rate of mortality and morbidity among human population;</p> <p>To prove that climate change can also increase the likelihood of infection in humans by way of</p>

		<p>affecting the transmission of infectious diseases; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“SS” to “SS-7”</b></p>	<p><i>Curriculum Vitae</i> of Carroll Muffett, consisting of 8 pages</p>	<p>To establish the credibility and expertise of Mr. Carroll Muffett to discuss the topic of legal and evidentiary bases for holding carbon majors accountable for climate crisis; and</p> <p>To prove the existence and contents of the document</p>
<p><b>“TT” to “TT-27”</b></p>	<p>Printed PowerPoint presentation of Carroll Muffett, entitled “The Legal and Evidentiary Basis for Holding Carbon Majors Accountable for the Climate Crisis,” consisting of 28 pages</p>	<p>To show the legal and evidentiary bases for holding carbon majors, including respondents herein, accountable for climate crisis;</p> <p>To show different climate cost recovery cases worldwide implicating some of respondent carbon majors;</p> <p>To support the oral testimony of Carroll Muffett on the topic “Legal and Evidentiary Basis for Holding Carbon Majors Accountable for Climate Crisis” during the May 2018 inquiry hearing; and</p> <p>To prove the existence and other contents of the document</p>

<p><b>“UU” to “UU-21”</b></p>	<p>On the Influence of Carbonic Acid in the Air upon the Temperature of the Ground by Svante Arrhenius dated April 1896, consisting of 22 pages</p>	<p>To show early research of the quantification of the contribution of carbon dioxide to the greenhouse effect and whether variations in the atmospheric concentration of carbon dioxide have contributed to long-term variations in climate; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“VV” to “VV-8”</b></p>	<p>The Artificial Production of Carbon Dioxide and its Influence on Temperature by G.S. Callendar dated 16 February 1938, consisting of 9 pages</p>	<p>To show that even in 1938 there was research showing that humans had added about millions of tons of carbon dioxide to the atmosphere during the previous half century through the combustion of fossil fuels;</p> <p>To show that early research on the radiation absorption coefficients of carbon dioxide and water vapor are used to show the effect of carbon dioxide on “sky radiation,” from which the increase in mean temperature, due to artificial production of carbon dioxide, is estimated to be at a rate of 0.003°C per year at the present time; and</p> <p>To prove the existence and contents of the document</p>
<p><b>“WW” to “WW-9”</b></p>	<p>On the Coefficients of Absorption of Nitrogen and</p>	<p>To show early research on the determination of the absorption coefficients of</p>



	<p>Oxygen in Distilled Water and Sea-water, and of Atmospheric Carbonic Acid in Sea-water by Charles J.J. Fox dated 27 April 1909, consisting of 10 pages</p>	<p>nitrogen, oxygen, and atmospheric carbonic acid in sea-water in relation to the problems brought by atmospheric gases, particularly carbonic acid and its effect upon terrestrial temperatures; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“XX” to “XX-20”</b></p>	<p>An Attempt to Frame a Working Hypothesis of the Cause of Glacial Periods on an Atmospheric Basis by T.C. Chamberlin dated September – October 1899, consisting of 21 pages</p>	<p>To show early research into how geological history has been accentuated by alternation of climatic episodes embracing periods of mild, equable, moist climate nearly uniform for the whole globe and periods when there were extremes of aridity and precipitation, and of heat and cold;</p> <p>To prove the existence and other contents of the document</p>
<p><b>“YY” to “YY-7”</b></p>	<p>Radiocarbon Evidence on the Dilution of Atmospheric and Oceanic Carbon by Carbon from Fossil Fuels by H.R. Brannon, et al. dated October 1957, consisting of 8 pages</p>	<p>To show that by no later than the 1950s, Humble Oil (now respondent ExxonMobil) was actively engaging in climate science and was aware of the risks posed by climate change;</p> <p>To prove that scientists with the Humble Oil Production Research Division understood the clear link between the burning of fossil fuels and rising CO<sub>2</sub> emissions,</p>

		<p>recognized even earlier climate research by pioneers in the field;</p> <p>To prove that the dilution of atmospheric carbon dioxide by carbon dioxide from fossil fuels was estimated to be about 3 ½ pct, on the basis of radiocarbon assays of tree rings of known ages from several trees of different genera, after allowance has been made for effects attributable to ecological differences;</p> <p>To prove that the cumulative mass of fossil carbon dioxide released to the atmosphere is equivalent to about 14 pct of the carbon dioxide in the atmosphere; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“ZZ” to “ZZ-5”</b></p>	<p>A Review of the Air Pollution Research Program of the Smoke and Fumes Committee of the American Petroleum Institute by Charles A. Jones dated May 1958, consisting of 6 pages</p>	<p>To show the review of the Air Pollution Research Program of the Smoke and Fumes Committee of the American Petroleum Institute written by Charles Jones, who was then the Executive Secretary of the Smoke and Fumes Committee of the API, and an executive at Shell Oil Company;</p> <p>To show the active role of the API Smoke and Fumes Committee in funding</p>

		<p>research, disseminating information, and helping “governmental organizations to avert restrictive and uneconomic rulings”;</p> <p>To prove that by no later than 1958, the Smoke and Fumes Committee (therefore API and the fossil fuel industry) had at least one project at Truesdail Laboratories, aiming to determine the amounts of atmospheric carbon attributable to fossil fuel sources;</p> <p>To confirm that the fossil fuel industry, through API, was aware of and researching on climate change; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“AAA” to “AAA-3”</b></p>	<p>The Petroleum Industry Sponsors Air Pollution Research by Vance N. Jenkins dated February 1954, consisting of 4 pages</p>	<p>To show the existence of a research sponsored by the petroleum industry on air pollution which proves their previous knowledge of the harmful effects of their products and operations; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“BBB” to “BBB-2”</b></p>	<p>American Petroleum Institute (API) Maintenance</p>	<p>To provide a list of companies, which includes several of the respondents</p>

	Fund Contributions (1957-1958), consisting of 3 pages	herein, that contribute to the American Petroleum Institute’s Maintenance Fund Contributions; and  To prove the existence and other contents of the document
<b>“CCC” to “CCC-5”</b>	American Petroleum Institute (API) Administrative Corporate Membership (1968), consisting of 6 pages	To provide a list of API’s Corporate Membership in 1968, which includes several of the respondents herein; and  To prove the existence and other contents of the document
<b>“DDD” to “DDD-5”</b>	American Petroleum Institute (API) Administrative Corporate Membership (1969), consisting of 6 pages	To provide a list of API’s Corporate Membership in 1969, which includes several of the respondents herein; and  To prove the existence and other contents of the document
<b>“EEE” to “EEE-3”</b>	1990 Corporate Membership Roster, consisting of 4 pages	To provide a list of API’s Corporate Membership in 1990, which includes several of the respondents herein; and  To prove the existence and other contents of the document
<b>“FFF” to “FFF-30”</b>	American Petroleum Institute Medical Advisory Committee 28 <sup>th</sup> Meeting (1959),	To show the existence and contents of the Minutes of the meetings during the 28th API’s Medical Advisory Committee on 6,

	<p>consisting of 31 pages</p>	<p>8, and 9 November 1959, which show that Mr. William Clausen, who represents API, sat on the Air Pollution Committee formed by the Department of Health, Education, and Welfare; thus the industry had prior knowledge of the harmful effects of their products and activities contributing to air pollution; and</p> <p>To prove other matters contained in the Minutes</p>
<p><b>“GGG” to “GGG-74”</b></p>	<p>Energy Resources (A Report to the Committee on Natural Resources) dated December 1962, consisting of 75 pages</p>	<p>To show the existence and contents of the report of National Academy of Sciences -- National Research Council to Committee on Natural Resources, specifically on the discussion of the increase in energy consumption of fossil fuels and amount of existing reserves; and</p> <p>To prove other matters stated therein</p>
<p><b>“HHH” to “HHH-13”</b></p>	<p>Final Report (Sources, Abundance, and Fate of Gaseous Atmospheric Pollutants) prepared for the American Petroleum Institute (1968), consisting of 14 pages</p>	<p>To prove prior knowledge of several of the respondents herein, which are members of API, regarding the existence and contents of the Final Report, specifically on the changes of carbon dioxide in the atmosphere, along with other gaseous pollutants, and the effects of increased atmospheric carbon dioxide that are</p>

		<p>“almost certain to occur by the year 2000 and these could bring climactic changes” which, according to the Final Report, gives rise to a severe damage to the environment; hence, must be of “serious concern”;</p> <p>To prove the existence and other contents of the document</p>
<p><b>“III” to “III-40”</b></p>	<p>Supplemental Report (Sources, Abundance, and Fate of Gaseous Atmospheric Pollutants) prepared for the American Petroleum Institute dated June 1969, consisting of 41 pages</p>	<p>To prove prior knowledge of several of the respondents herein, which are or were members of API, regarding the existence and contents of the Supplemental Report of the aforementioned Final Report, which provides a more detailed analysis of the atmospheric build-up of CO<sub>2</sub> and newer analysis of the question of CO concentrations;</p> <p>To prove their prior knowledge that CO<sub>2</sub> concentrations are increasing at a rate of about 0.7 ppm per year, the increase in atmospheric CO<sub>2</sub> represents about half the CO<sub>2</sub> produced by combustion sources since 1900, and the CO<sub>2</sub> emissions in the year 2000 would be almost three times the estimated 1965 rate and would result in 16% increase in atmospheric concentrations, to a level of</p>

		<p>370 ppm; and to prove other matters stated in the Supplemental Report;</p> <p>To show, according to Mr. Muffett, that the industry took a much more skeptical approach to climate science and even “omitted several paragraphs from the 1968 report that summarized the potential environmental and human impacts of climate change.” This report was used later by the industry to downplay climate risks; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“JJJ” to “JJJ-215”</b></p>	<p>Environmental Conservation (The Oil and Gas Industries / Volume Two) by National Petroleum Council dated February 1972, consisting of 216 pages</p>	<p>To prove the existence of the National Petroleum Council which represents virtually all segments of the U.S. oil and gas industries that include several of the respondents herein; to prove that the oil and gas industries -- several of the respondents herein -- have prior knowledge of specific environmental problems resulting from the conduct of their various operations of production, refining, storage, transportation, and marketing of products, and also outside these industries, from the use of their products;</p> <p>To prove that these industries “face a</p>

		<p>requirement to provide to the society of which they are part vital energy in a manner consistent with environmental conservation, recognizing that the costs involved are those of society”; and</p> <p>To prove other matters contained in the document</p>
<p><b>“KKK to KKK-16”</b></p>	<p>Exxon Research and Engineering Company Letter to Mr. Turpin dated 06 June 1978, consisting of 17 pages</p>	<p>To prove Exxon’s prior knowledge of clear scientific consensus regarding the expected climactic effects of increased atmospheric CO<sub>2</sub> and the unanimous agreement in the scientific community that a temperature increase of 3.0 ± 1.5 °C would bring about significant changes in the earth’s climate, including rainfall distribution and alterations in the biosphere, and the time required for doubling of atmospheric CO<sub>2</sub> depends on future world consumption of fossil fuels;</p> <p>To prove the existence and contents of Exxon’s internal research, the findings of which are in accord with the scientific consensus on the effect of increased atmospheric CO<sub>2</sub> on climate; and</p> <p>To prove the existence and other contents of the document</p>



<p><b>“LLL to LLL-20”</b></p>	<p>Review of Environmental Protection Activities for 1978-1979 (Imperial Oil Limited), consisting of 21 pages</p>	<p>To show the environmental protection activities for 1978-1979;</p> <p>To show that burning of fossil fuels is a major contributor of CO<sub>2</sub>; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“MMM” to “MMM-1”</b></p>	<p>Exxon Research and Engineering Company Letter to Mr. Natkin dated 02 September 1982, consisting of 2 pages</p>	<p>To prove respondent ExxonMobil’s prior knowledge of clear scientific consensus regarding the expected climactic effects of increased atmospheric CO<sub>2</sub> and the “unanimous agreement in the scientific community” that temperature increase of 3.0 ± 1.5°C would bring about significant changes in the earth’s climate, including rainfall distribution and alterations in the biosphere, and the time required for doubling of atmospheric CO<sub>2</sub> depends on future world consumption of fossil fuels;</p> <p>To prove the existence and contents of Exxon’s internal research, the findings of which are in accord with the scientific consensus on the effect of increased atmospheric CO<sub>2</sub> on climate; and</p> <p>To prove the existence and other contents of the document</p>

<p><b>“NNN” to “NNN-45”</b></p>	<p>The Greenhouse Effect (Prepared for Shell Environmental Conservation Committee) dated May 1988 (completion of the study on April 1986), consisting of 46 pages</p>	<p>To prove respondent Shell’s prior knowledge and admission that mainly due to fossil fuel burning and deforestation, the atmospheric CO<sub>2</sub> concentration had at that time increased some 15% in the present century to a level of about 340ppm and if this trend continues, it will be doubled by the third quarter of the next century;</p> <p>To prove respondent Shell’s prior knowledge and admission that fossil fuel combustion is the major source of CO<sub>2</sub> in the atmosphere; hence, “a forward looking approach by the energy industry is clearly desirable”;</p> <p>To prove that respondent Shell had known that rising level of atmospheric carbon dioxide can have a substantial impact on global habitability; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“OOO” to “OOO-5”</b></p> <p><b>“OOO-5-A”</b></p>	<p><i>Salaysay ni Gg. Pablo R. Rosales</i> dated 09 May 2018, consisting of 6 pages</p> <p>Signature of Gg. Pablo R. Rosales</p>	<p>To prove how climate change impacted his life and livelihood as a fisherman for more than five decades, including concerns of his fisherfolk organization;</p> <p>To support the oral testimony of Mr. Pablo</p>

		<p>Rosales during the May 2018 inquiry hearing; and</p> <p>To prove the existence, due execution, and other contents of the document</p>
<p><b>“PPP” to “PPP-3”</b></p> <p><b>“PPP-3-A”</b></p>	<p><i>Salaysay ni Gg. Jonathan delos Reyes</i> dated 15 May 2018, consisting of 4 pages</p> <p>Signature of Gg. Jonathan delos Reyes</p>	<p>To prove how climate change impacted his life and livelihood as a small business owner buying fish directly from fisher folks and selling the same (consignation);</p> <p>To support the oral testimony of Mr. Jonathan delos Reyes during the May 2018 inquiry hearing; and</p> <p>To prove the existence, due execution, and other contents of the document</p>
<p><b>“QQQ” to “QQQ-8”</b></p> <p><b>“QQQ-8-A”</b></p>	<p>Profile and Statement of Michael K. Addo dated 20 May 2018, consisting of 9 pages</p> <p>Signature of Michael K. Addo</p>	<p>To prove the existence and general contents of the United Nations Guiding Principles on Business and Human Rights declaring the State’s duty to protect human rights abuses by third parties, including businesses, corporate responsibility to respect human rights, and ensuring access to remedy for victims of business-related human rights abuses by the States and businesses;</p> <p>To prove in particular the responsibility of business enterprises, regardless of size, sector, operational context, ownership, and</p>

		<p>structure to respect human rights, avoid causing, contributing or being linked to adverse human rights harms, and preventing, mitigating, or remedying any unavoidable adverse impacts;</p> <p>To prove that the United Nations Guiding Principles on Business and Human Rights is applicable in the context of climate change “with the expectation that companies should avoid causing harm by causing, contributing or being linked to climate change”;</p> <p>To show corporate human rights due diligence which refers to mechanisms and processes to reveal the potential impacts of the enterprise’s activities; and</p> <p>To prove the existence, due execution, and other contents of the document</p>
<p><b>“RRR” to “RRR-15”</b></p>	<p><i>Curriculum Vitae</i> of Michael K. Addo, consisting of 16 pages</p>	<p>To establish the credibility and expertise Michael Addo to discuss the topic he presented; and</p> <p>To prove the existence and contents of the document</p>
<p><b>“SSS” to “SSS-20”</b></p>	<p>Printed PowerPoint presentation of Michael K. Addo, entitled “Inquiry into the Effects of Climate Change on</p>	<p>To prove the existence and general contents of the United Nations Guiding Principles on Business and Human Rights declaring the State’s duty to protect</p>

	<p>Human Rights: The UN Guiding Principles on Business and Human Rights and the Responsibilities of Business Enterprises,” consisting of 21 pages</p>	<p>human rights abuses by third parties, including businesses, corporate responsibility to respect human rights, and ensuring access to remedy for victims of business-related human rights abuses by the States and businesses;</p> <p>To prove in particular the responsibility of business enterprises, regardless of size, sector, operational context, ownership, and structure to respect human rights, avoid causing, contributing or being linked to adverse human rights harms, and preventing, mitigating, or remedying any unavoidable adverse impacts;</p> <p>To prove that the United Nations Guiding Principles on Business and Human Rights is applicable in the context of climate change “with the expectation that companies should avoid causing harm by causing, contributing or being linked to climate change”;</p> <p>To show corporate human rights due diligence which refers to mechanisms and processes to reveal the potential impacts of the enterprise’s activities;</p> <p>To support the oral testimony of Michael K. Addo during the May 2018 inquiry hearing; and</p>
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<p><b>“TTT” to “TTT-2”</b></p> <p><b>“TTT-2-A”</b></p>	<p><i>Curriculum Vitae</i> of Department of Agriculture Undersecretary Segfredo R. Serrano, consisting of 3 pages</p> <p>Signature of Undersecretary Segfredo R. Serrano</p>	<p>To establish the credibility and expertise of Usec. Segfredo R. Serrano to discuss the topic of how climate change impacted Philippine agriculture; and</p> <p>To prove the existence, due execution, and other contents of the document</p>
<p><b>“UUU” to “UUU-8”</b></p>	<p>Printed PowerPoint presentation of Usec. Segfredo R. Serrano, entitled “Climate Change &amp; Philippine Agriculture,” consisting of 9 pages</p>	<p>To prove the impacts of climate change on the Philippine agriculture, specifically on rice, corn/maize, vegetables, fruits, livestock, marine and coastal habitats, rural infrastructure and investments related to agriculture, farmers, fisherfolks, and the people in general;</p> <p>To support the oral testimony of Usec. Segfredo R. Serrano during the May 2018 inquiry hearing; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“VVV”</b></p>	<p>Abstract Statement of Dr. Vincent Hilomen, consisting of 1 page</p>	<p>To prove that effects of climate change is a direct threat to the components of food chain, which in turn compromises food security of men;</p>



<p><b>“YYY” to “YYY-1-A”</b></p> <p><b>“YYY” to “YYY-1-B”</b></p>	<p>Signature of Gg. Isagani Molina</p> <p>Signature of Archie de Ramos</p>	<p>aggravate people’s poverty and vulnerabilities;</p> <p>To support the oral testimonies of Mr. Isagani Molina and Mr. RJ de Ramos during the May 2018 public; and</p> <p>To prove the existence, due execution, and other contents of the document</p>
<p><b>“ZZZ” to “ZZZ-2”</b></p> <p><b>“ZZZ-2-A”</b></p> <p><b>“ZZZ-2-B”</b></p> <p><b>“ZZZ-2-C”</b></p>	<p><i>Mga Salaysay nina Gg. Manuel A. Abinales, Gg. Pablo Taon III, at Gng. Francia M. Encinas, consisting of 3 pages</i></p> <p>Signature of Gg. Manuel A. Abinales</p> <p>Signature of Gg. Pablo Taon III</p> <p>Signature of Gng. Francia M. Encinas</p>	<p>To prove how extreme weather events, like super typhoon Ketsana (“Ondoy”) impacted the lives and livelihood of urban poor in Metro Manila and how these aggravate people’s poverty and vulnerabilities;</p> <p>To support the oral testimonies of Mr. Manuel Abinales, Mr. Pablo Taon III, and Ms. Francia Encinas during the May 2018 inquiry hearing; and</p> <p>To prove the existence, due execution, and other contents of the document</p>
<p><b>“AAAA”</b> (None; skipped)</p>	<p>Supposed to be the Statement of the Climate Change Commission (CCC) [per petitioners’ Manifestation during the hearing on 24 May 2018, the same is already abandoned since Atty. Efren Bascos</p>	<p>This exhibit was initially reserved for the presentation of the Climate Change Commission (CCC). Due to the non-appearance of the CCC’s representative during the following hearing, the reservation of the exhibit letter was nullified and skipped to avoid confusion</p>



	manifested before the Commission that CCC will be a resource person of the Commission, not of the petitioners)	for the following exhibits already marked.
<b>“BBBB”</b>	Profile of Dr. Marcos Orellana, consisting of 1 page	To establish the credibility and expertise of Dr. Marcos Orellana to discuss the topic he presented; and
<b>“BBBB-A”</b>	Signature of Dr. Marcos Orellana	To prove the existence, due execution, and contents of the document
<b>“CCCC” to “CCCC-6”</b>	Statement of Dr. Marcos Orellana, consisting of 7 pages	To prove the existence and contents of the legal framework of human rights responsibility of corporations, like respondents herein;
<b>“CCCC-6-A”</b>	Signature of Dr. Marcos Orellana	To prove that respondent Carbon Majors are responsible to respect human rights under the United Nations Guiding Principles on Business and Human Rights and should be accountable for the negative human rights impacts of their activities;
		To show the analysis of the opinion of the Inter-American Court of Human Rights recognizing an autonomous right to a healthy environment and States’ extraterritorial jurisdiction, specifically stating that in case of transboundary environmental harm that impacts on human rights,

		<p>the persons whose rights have been violated are under the jurisdiction of the State of origin of the harm; and</p> <p>To prove the existence, due execution, and other contents of the document</p>
<p><b>“DDDD” to “DDDD-10”</b></p>	<p>Printed PowerPoint presentation of Marcos Orellana, entitled “Human Rights and Corporate Responsibilities for Climate Change Impacts,” consisting of 11 pages</p>	<p>To prove the existence and contents of the legal framework of human rights responsibility of corporations, like respondents herein;</p> <p>To prove that respondent Carbon Majors are responsible to respect human rights under the United Nations Guiding Principles on Business and Human Rights and should be accountable for the negative human rights impacts of their activities;</p> <p>To show the analysis of the opinion of the Inter-American Court of Human Rights recognizing an autonomous right to a healthy environment and States’ extraterritorial jurisdiction, specifically stating that in case of transboundary environmental harm that impacts on human rights, the persons whose rights have been violated are under the jurisdiction of the State of origin of the harm;</p>

		<p>To support the oral testimony of Dr. Marcos Orellana during the May 2018 inquiry hearing; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“EEEE” to “EEEE-42”</b></p> <p><b>“EEEE-42-A”</b></p>	<p><i>Curriculum Vitae</i> of Mudjekeewis D. Santos, PhD, consisting of 43 pages</p> <p>Signature of Mudjekeewis D. Santos, PhD</p>	<p>To establish the credibility and expertise of Mudjekeewis D. Santos, PhD to discuss the topic of impacts of climate change to Philippine fisheries; and</p> <p>To prove the existence, due execution, and other contents of the document</p>
<p><b>“FFFF”</b></p> <p><b>“FFFF-A”</b></p>	<p>Abstract/Statement of Mudjekeewis D. Santos, PhD (Impacts of Climate Change to Philippine Fisheries), consisting of 1 page</p> <p>Signature of Mudjekeewis D. Santos, Ph.D.</p>	<p>To show that the Philippines has been consistently predicted to be one of the main countries to be impacted by climate change; consequently, “the fisheries sector of the country is predicted to be most impacted since about 70% of the population lives in coastal communities, about 70% of protein requirement of coastal communities comes from fish, and fisherfolks have low levels of socio-economic capacities and are considered ‘poorest of the poor’”; and</p> <p>To prove the existence, due execution, and other contents of the document</p>
<p><b>“GGGG” to “GGGG-13”</b></p>	<p>Printed PowerPoint presentation of</p>	<p>To prove that climate change severely impacts</p>

	<p>Mudjekeewis D. Santos, PhD, entitled “Impacts of Climate Change to Philippine Fisheries,” consisting of 14 pages</p>	<p>Philippine fisheries, specifically 10 of 13 fishing grounds in the Philippines are in crisis and demersal fish biomass in Manila Bay was reduced to only 10%, among others;</p> <p>To show the predicted impacts of climate change to Philippine fisheries;</p> <p>To give recommendations on ways forward regarding aquaculture and capture fisheries to avoid or mitigate the effects of climate change;</p> <p>To support the testimony of Mudjekeewis D. Santos, PhD during the May 2018 inquiry hearing; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“HHHH” to “HHHH-31”</b></p>	<p>Fisheries Vulnerability Assessment Tool by Angela Aguila and Mudjekeewis Santos, Ph.D., consisting of 32 pages</p>	<p>To prove the vulnerability of Philippine fisheries sector to the impacts of climate change; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“III” to “III-14”</b></p>	<p>Department of Agriculture Climate Change R&amp;D 2016-2022 by Dr. Maripaz Perez, Dr. Laura David, Dr. Mudjekeewis Santos, et al.,</p>	<p>To show climate impacts and problem areas in aquaculture and capture fisheries in the Philippines, its researchable areas, outputs, and possible agencies that could help in the implementation; and</p>

	consisting of 15 pages	To prove the existence and other contents of the document
<b>“JJJJ” to “JJJJ-12”</b>	Possible Effects of El Niño on Some Philippine Marine Fisheries Resources by Amor Damatac II and Mudjekeewis Santos, PhD, published in Philippine Journal of Science (September 2016), consisting of 13 pages	<p>To show how El Niño, a warm phase of extreme climactic phenomenon, affects marine organisms leading to an increased phytoplankton biomass and widespread coral bleaching and possible fish kills, seaweed diseases, threats to marine animals, fish migration, and change in catch production;</p> <p>To show the predicted impacts of El Niño on food security;</p> <p>To provide key researchable areas to be implemented to support management strategies that will mitigate the possible effects of El Niño in the Philippines; and</p> <p>To prove the existence and other contents of the document</p>
<b>“KKKK” to “KKKK-7”</b>	Development and Application of the Fisheries Vulnerability Assessment Tool (Fish Vool) to Tuna and Sardine Sectors in the Philippines by Melchor Jacinto, Mudjekeewis Santos, PhD, et al. dated 05 July 2014,	<p>To show a sector-based fisheries vulnerability assessment tool (Fish Vool) to evaluate the vulnerability of primary of primary fisheries commodity (tuna and sardine);</p> <p>To show overall medium vulnerability to climate change of tuna and sardine sectors in the Philippines;</p>

	<p>consisting of 8 pages</p>	<p>To show the potential of the Fish Vool to assess the climate change vulnerability for primary commodities and other fishery sectors; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“LLLL” to “LLLL-4”</b></p> <p><b>“LLLL-4-A”</b></p>	<p><i>Salaysay ni Arthur S. Golong</i> dated 16 August 2018, consisting of 5 pages</p> <p>Signature of Arthur S. Golong</p>	<p>To prove how extreme weather events like super typhoon Haiyan (“Yolanda”) negatively impact the lives and livelihoods of people;</p> <p>To prove how climate-related events compounded gender-based discrimination and how it changed the life of a survivor;</p> <p>To support the oral testimony of Ms. Arthur S. Golong during the August 2018 inquiry hearing; and</p> <p>To prove the existence, due execution, and other contents of the document</p>
<p><b>“MMMM”</b></p>	<p>Abstract of the study entitled ‘Country Scoping Studies to Build Evidence on Children’s Vulnerabilities to Climate Change and Disaster Impacts: PHILIPPINES’ Report Submitted</p>	<p>To show an overview of the climate change trends and the potential impacts on children in the Philippines, highlighting children’s specific vulnerability to climate change that needs to be taken into account in policy development;</p>

	to the UNICEF by the Manila Observatory of Rosa Perez, PhD and May Celine Vicente, PhD dated 20 August 2018, consisting of 1 page	To support the oral testimonies of Drs. Rosa Perez and May Celine Vicente during the August 2018 inquiry hearing; and  To prove the existence, due execution, and other contents of the document
<b>“NNNN” to “NNNN-3”</b>	<i>Curriculum Vitae</i> of Rosa Perez, PhD, consisting of 4 pages	To establish the credibility and expertise of Rosa Perez, PhD on the topic she presented; and  To prove the existence and other contents of the document
<b>“OOOO” to “OOOO-25”</b>	<i>Curriculum Vitae</i> of May Celine Vicente, PhD, consisting of 26 pages	To establish the credibility and expertise of May Celine Vicente, PhD on the topic she presented; and  To prove the existence and contents of the document
<b>“PPPP” to “PPPP-26”</b>	Printed PowerPoint Presentation of Rosa Perez, PhD and May Celine Vicente, PhD, entitled “Country Scoping Studies to Build Evidence on Children’s Vulnerabilities to Climate Change and Disaster Impacts: Philippines,” consisting of 27 pages	To show an overview of the climate change trends and the potential impacts on children in the Philippines, highlighting children’s specific vulnerability to climate change that needs to be taken into account in policy development;  To support the oral testimonies of Drs. Rosa Perez and May Celine Vicente during the August 2018 inquiry hearing; and

		To prove the existence and other contents of the document
<p><b>“QQQQ” to “QQQQ-11”</b></p> <p><b>“QQQQ” to “QQQQ-11-A”</b></p>	<p>Profile and Statement of Richard Heede dated 07 August 2018, consisting of 12 pages</p> <p>Signature of Richard Heede</p>	<p>To show the findings of the Carbon Majors publications;</p> <p>To prove that two-thirds of all carbon dioxide and methane emissions came from fossil fuel and cement sources since the industrial revolution has been traced to the production activities of world’s 90 largest oil, gas, coal, and cement producers, 47 investor-owned companies of which were impleaded herein as respondents;</p> <p>To show insights on what steps respondent carbon majors should take to remedy, eliminate, and prevent human rights harms resulting from the products they extract and sell; and</p> <p>To prove the existence, due execution, and other contents of the document</p>
<b>“RRRR to RRRR-5”</b>	<i>Curriculum Vitae</i> of Richard Heede, consisting of 6 pages	<p>To establish the credibility and expertise of Mr. Richard Heede on the topic he presented; and</p> <p>To prove the existence and contents of the document</p>



<p><b>“SSSS” to “SSSS-11”</b></p>	<p>Printed PowerPoint Presentation of Richard Heede, “Climate Accountability Institutes’ work to quantify the contributions of carbon producers to climate change and climate damages,” consisting of 12 pages</p>	<p>To show the findings of the Carbon Majors publications;</p> <p>To prove that two-thirds of all carbon dioxide and methane emissions from fossil fuel and cement sources since the industrial revolution has been traced to the production activities of world’s 90 largest oil, gas, coal, and cement producers, 47 of which were impleaded herein as respondents;</p> <p>To show insights on what steps respondent carbon majors should take to remedy, eliminate, and prevent human rights harms resulting from the fossil fuel products they extract and sell;</p> <p>To prove what some of the fossil fuel companies knew and when they obtained the knowledge;</p> <p>To support the testimony of Mr. Richard Heede during August 2018 inquiry hearing; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“TTTT” to “TTTT-1”</b> (Previously marked as <b>Exhibit “D-1”</b>)</p>	<p>Climate Accountability Institute, Press Release on Update of Carbon Majors</p>	<p>To show that there was press release on Climate Accountability Institute’s findings detailing the direct and product-related emissions traced to the</p>

	<p>Project, consisting of 2 pages</p>	<p>major industrial carbon producers in the oil, natural gas, coal, and cement entities -- 47 of which are respondents herein -- through the year 2013; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“UUUU” to “UUUU-103”</b> (Previously marked as <b>Exhibit “D-2”</b>)</p>	<p>Carbon Majors: Accounting for Carbon and Methane Emissions 1854-2010 Methods and Results Report, consisting of 104 pages</p>	<p>To prove that two-thirds of all carbon dioxide and methane emissions from fossil fuel and cement sources since the industrial revolution has been traced to the production activities of world’s 90 largest oil, gas, coal, and cement producers, 47 of which were impleaded herein as respondents; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“VVVV” to “VVVV-14”</b> (Previously marked as <b>Exhibit “D-3”</b>)</p>	<p>Tracing Anthropogenic Carbon Dioxide and Methane Emissions to Fossil Fuel and Cement Producers, 1854-2010, consisting of 15 pages</p>	<p>To show quantitative analysis of the historic fossil fuel and cement production records of the 50 leading investor-owned, 31 state-owned, and 9-nation state producers of oil, natural gas, coal, and cement from as early as 1854 to 2010;</p> <p>To show that this analysis traces emissions totaling 914 GtCO<sub>2</sub>e— 63% of cumulative worldwide emissions of industrial CO<sub>2</sub> and methane between 1751 and 2010— to the 90 “carbon major” entities</p>

		<p>based on the carbon content of marketed hydrocarbon fuels (subtracting for non-energy uses), process CO<sub>2</sub> from cement manufacture, CO<sub>2</sub> from flaring, venting, and own fuel use, and fugitive or vented methane;</p> <p>To prove that most of respondent Carbon Majors possess fossil fuel reserves that will, if produced and emitted, intensify anthropogenic climate change; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“WWWW” to “WWWW-9”</b></p>	<p>Supplementary Materials (“Tracing Anthropogenic Carbon Dioxide and Methane Emissions to Fossil Fuel and Cement Producers, 1854-2010”), consisting of 10 pages</p>	<p>To supplement the foregoing document, specifically showing additional facts (i.e., methodology, data sources, net and gross production, acquisitions and divestitures, emissions, etc.) attributing significant amount of carbon and methane emissions to largest fossil fuel and cement producers, 47 of which are respondents herein; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“XXXX” to “XXXX-14”</b> (re-marked as <b>Exhibit “Y”</b>)</p>	<p>The climate responsibilities of industrial carbon producers, Climatic</p>	<p>To show the distinctive responsibilities of the major investor-owned producers of fossil fuels --</p>

	<p>Change by Peter Frumhoff, Richard Heede, and Naomi Oreskes dated 23 July 2015, consisting of 15 pages</p>	<p>respondents herein -- assessing the actions these companies took and could have taken to act upon the scientific evidence of climate change;</p> <p>To prove that respondents herein carry significant responsibility for climate change, but it is still possible for these companies to effectively contribute to solutions; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“YYYY” to “YYYY-8”</b></p>	<p>Potential emissions of CO<sub>2</sub> and methane from proved reserves of fossil fuels: An alternative analysis by Richard Heede and Naomi Oreskes dated 25 November 2015, consisting of 9 pages</p>	<p>To show the potential emissions of CO<sub>2</sub> and methane from the proved reserves as reported by the world's largest producers of oil, natural gas, and coal -- respondents herein -- focused on the seventy companies and eight government-run industries that produced 63% of the world's fossil fuels from 1750 to 2010;</p> <p>To show the analysis that suggests what may be needed to prevent dangerous anthropogenic interference with the climate system differs when one considers the state-owned entities versus the investor-owned entities; and</p>

		To prove the existence and other contents of the document
<b>“ZZZZ” to “ZZZZ-3”</b>	Supplementary Materials (“Potential emissions of CO <sub>2</sub> and methane from proved reserves of fossil fuels: An alternative analysis”) by Richard Heede and Naomi Oreskes, consisting of 4 pages	To supplement the facts and findings of the previous document, specifically detailing the methodology, coal reserves, and IPCC Remaining Carbon Budget; and  To prove the existence and other contents of the document
<b>“AAAAA” to “AAAAA-15”</b>	Carbon producers’ tar pit: dinosaurs beware (The path to accountability of fossil fuel producers for climate change & climate damages) by Richard Heede dated 17 October 2017, consisting of 16 pages	To trace the evolution of the project – quantifying the contribution to atmospheric carbon dioxide and methane arising from the operational emissions of fossil fuel company supply chains and the sale of carbon fuels to consumers began, its methods and results, the milestones, and the reactions of industry and government up to the recent publication of an attribution study in <i>Climactic Change</i> , corporate accountability for climate change, industry climate denial efforts, their moral obligation to lead decarbonizing the world economy, potential litigation risks for climate damages and reparations, and lawsuits filed by citizens, countries, and

		<p>cities in California and elsewhere; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“BBBBB” to “BBBBB-3”</b></p> <p><b>“BBBBB” to “BBBBB-3-A”</b></p>	<p><i>Salaysay ni Gg. Elicer G. Lauce</i> dated 15 August 2018, consisting of 4 pages</p> <p>Signature of Elicer G. Lauce</p>	<p>To prove how extreme heat and weather events impacted his life and livelihood as a farmer and fisherfolk in Capalonga, Camarines Norte;</p> <p>To support the oral testimony of Mr. Elicer Lauce during the August 2018 inquiry hearing; and</p> <p>To prove the existence, due execution, and other contents of the document</p>
<p><b>“CCCCC” to “CCCCC-2”</b></p> <p><b>“CCCCC” to “CCCCC-2-A”</b></p>	<p><i>Salaysay ni Gng. Delia A. Tulagan</i> dated 15 August 2018, consisting of 3 pages</p> <p>Signature of Delia A. Tulagan</p>	<p>To prove how extreme heat and weather events impacted her life and livelihood as a farmer in Capalonga, Camarines Norte;</p> <p>To support the oral testimony of Ms. Delia Tulagan during the August 2018 inquiry hearing; and</p> <p>To prove the existence, due execution, and other contents of the document</p>
<p><b>“DDDDD” to “DDDDD-22”</b></p>	<p>Profile and Statement of Geoffrey Supran, PhD dated 02 August 2018,</p>	<p>To prove the existence and contents of the paper he co-authored with Harvard University Professor Naomi Oreskes, entitled “Assessing Exxonmobil’s</p>

<p><b>“DDDDD” to “DDDDD-19-A”</b></p>	<p>consisting of 23 pages</p> <p>Signature of Geoffrey Supran, PhD</p>	<p>climate change communications [1977-2014]”),” touching on empirical analysis and comparison of 187 climate change communications from respondent ExxonMobil and findings concerning whether the corporation has in the past misled the general public about climate change;</p> <p>To prove that respondent ExxonMobil misled the public with discrepant communications, deceptive advertorials and non-peer-reviewed publications, and funding climate denial; and</p> <p>To prove the existence, due execution, and other contents of the document</p>
<p><b>“EEEEEE” to “EEEEEE-2”</b></p>	<p><i>Curriculum Vitae</i> of Geoffrey Supran, PhD, consisting of 3 pages</p>	<p>To establish the credibility and expertise of Geoffrey Supran, PhD on the topic he presented; and</p> <p>To prove the existence and contents of the document</p>
<p><b>“FFFFF” to “FFFFF-36”</b></p>	<p>Printed PowerPoint Presentation of Geoffrey Supran, entitled “Assessing ExxonMobil’s climate change communications,” consisting of 37 pages</p>	<p>To prove that fossil fuel companies and trade associations, including respondent ExxonMobil and several of the respondent Carbon Majors, have variously promoted disinformation about climate change so as to stifle action by the public and policymakers;</p>





		<p>To show CIEL’s Opinion on Oil Industry Conduct and International Norms and Standards, as discussed in Exhibit “G” hereof; and</p> <p>To prove the existence, due execution, and other contents of the document</p>
<p><b>“HHHHH” to “HHHHH-11”</b></p>	<p>Printed PowerPoint Presentation of Carroll Muffett, “Oil, Carbon and Climate Change: Known Risks and Foreseeable Harms,” consisting of 12 pages</p>	<p>In addition to the above, to show the sources, abundance, and fate of gaseous atmospheric pollutants;</p> <p>To show the foreseeable hazards, victims, and impacts on the Philippines of respondent carbon majors’ activities;</p> <p>To support the oral testimony of Mr. Carroll Muffett during the August 2018 inquiry hearing; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“IIII” to “IIII-15”</b></p>	<p>A Crack in the Shell (New Documents Expose a Hidden Climate History) by the Center for International and Environmental Law dated April 2018, consisting of 16 pages</p>	<p>To prove that respondent Shell’s internal discussions and its public actions during a critical window for climate action showed misleading and deceptive efforts;</p> <p>To prove that respondent Shell had early, repeated, and often urgent notice of climate risks linked to its products; to prove that respondent Shell maintained active</p>

		<p>membership in an array of industry trade groups and front groups that carried out a decades-long campaign of climate denial and climate obstruction;</p> <p>To prove that respondent Shell has been at the leading edge of climate science at least since the early days of scientific research into causes and effect of climate change began in earnest and has actively participated in the research and communications apparatus of the American Petroleum Institute, which was studying the issue no later than 1958; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“JJJJ” to “JJJJ-5”</b></p>	<p>“Accomplishment in Air Pollution Control by the Petroleum Industry” by Dr. Jerry McAfee dated 15 November 1958, consisting of 6 pages</p>	<p>To prove prior knowledge of the petroleum industry/association, most of which respondents are part of, the negative implications of their products and operations which cause air pollution; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“KKKKK” to “KKKKK-33”</b></p>	<p>The Greenhouse Effect; J.F. Black, Products Research Division, Exxon Research and</p>	<p>To prove respondent ExxonMobil’s prior knowledge through its internal research that there is general scientific</p>

	<p>Engineering Co. dated 06 June 1978, consisting of 34 pages</p>	<p>agreement that the most likely manner in which mankind is influencing the global climate is through carbon dioxide release from the burning of fossil fuels and a doubling of carbon dioxide is estimated to be capable of increasing the average global temperature by from 1°to 3°C, with a 10°C rise predicted at the poles; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“LLLLL” to “LLLLL-1”</b></p>	<p>CO<sub>2</sub> Position Statement dated 15 May 1981 with attached Preliminary Statement of Exxon’s Position of the Growth of Atmospheric Carbon Dioxide, consisting of 2 pages</p>	<p>To show respondent ExxonMobil’s Position of the Growth of Atmospheric Carbon Dioxide;</p> <p>To prove respondent ExxonMobil’s prior knowledge of the negative climate impacts of burning fossil fuels; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“MMMMM” to “MMMMM-3”</b> (also marked as Exhibit “MMM” to “MMM-3”)</p>	<p>Letter to Mr. Natkin (the Office of Science and Technology Exxon Corporation) by Mr. Cohen dated 02 September 1982, consisting of 4 pages</p>	<p>To prove respondent ExxonMobil’s prior knowledge of clear scientific consensus regarding the expected climactic effects of increased atmospheric CO<sub>2</sub> and the “unanimous agreement in the scientific community” that temperature increase of 3.0 ± 1.5°C would bring about significant changes in the</p>

		<p>earth’s climate, including rainfall distribution and alterations in the biosphere, and the time required for doubling of atmospheric CO<sub>2</sub> depends on future world consumption of fossil fuels;</p> <p>To prove the existence and contents of Exxon’s internal research, the findings of which are in accord with the scientific consensus on the effect of increased atmospheric CO<sub>2</sub> on climate; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“NNNNN” to “NNNNN-33”</b></p>	<p>Minutes of the Joint Hearings before the Committee on Commerce and the Subcommittee on Air and Water Pollution of the Committee on Public Works United on, “A Bill to Amend the Clean Air Act in order to Authorize and Investigation and Study to Determine Means of Propelling Vehicles so as not to Contribute to Air Pollution,” and “A Bill to Authorize a Program of</p>	<p>To prove the fossil fuel industry’s efforts to block meaningful legislations to combat air pollution brought about by the use of their products; and</p> <p>To prove the existence and other contents of the document</p>

	<p>Research, Development and Demonstration Projects for Electrically Powered Vehicles,” consisting of 34 pages</p>	
<p>“OOOOO” to “OOOOO-1”</p> <p>“OOOOO-1-A”</p>	<p><i>Salaysay ni Gg. Buucan Hangdaan</i> dated 14 August 2018, consisting of 2 pages</p> <p>Signature of Buucan Hangdaan</p>	<p>To show how increase in atmospheric temperature, intensifying weather events, and other climate impacts threaten the 2,000-year old Ifugao rice terraces, including the communities depending on them and the cultural practices of indigenous Ifugao people;</p> <p>To support the oral testimony of Mr. Buucan Hangdaan during the August 2018 inquiry hearing; and</p> <p>To prove the existence, due execution, and other contents of the document</p>
<p>“PPPPP” to “PPPPP-2”</p> <p>“PPPPP-2-A”</p>	<p><i>Salaysay ni Bb. Dalia Nalliw</i> dated 14 August 2018, consisting of 3 pages</p> <p>Signature of Dalia Nalliw</p>	<p>To show how increase in atmospheric temperature, intensifying weather events, and other climate impacts threaten the 2,000-year old Ifugao rice terraces, including the communities depending on them and the cultural practices of Indigenous Ifugao people, especially impacts on the youth living there;</p>

		<p>To support the oral testimony of Ms. Dalia Nalliw during the August 2018 inquiry hearing; and</p> <p>To prove the existence, due execution, and other contents of the document</p>
<p><b>“QQQQQ” to “QQQQQ-1”</b></p> <p><b>“QQQQQ-1-A”</b></p>	<p>Statement of William B. Mamanglo, consisting of 2 pages</p> <p>Signature of William B. Mamanglo</p>	<p>To show, among others, the brief profile of the Province of Ifugao and the development challenges therein which include impacts of climate change; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“RRRRR”</b></p>	<p><i>Curriculum Vitae</i> of William B. Mamanglo, consisting of 1 page</p>	<p>To establish the credibility and expertise of William B. Mamanglo on the topic he presented; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“SSSSS” to “SSSSS-21”</b></p>	<p>Printed PowerPoint Presentation of William B. Mamanglo, entitled “Province of Ifugao,” consisting of 22 pages</p>	<p>To show, among others, the brief profile of the Province of Ifugao and the development challenges therein, which include impacts of climate change;</p> <p>To support the oral testimony of Mr. William B. Mamanglo during the August 2018 inquiry hearing; and</p>

		To prove the existence and other contents of the document
<p><b>“TTTTT”</b></p> <p><b>“TTTTT-A”</b></p>	<p>Statement of Neil Aldrin D. Mallari, PhD Ecology dated 13 August 2018, consisting of 1 page</p> <p>Signature of Neil Aldrin D. Mallari</p>	<p>To prove that Philippines’ biodiversity is vulnerable to the deleterious effects of climate change, specifically that climate change affects ecosystems and species’ ability to adapt and so biodiversity loss increases;</p> <p>To prove that climate change is already forcing biodiversity to adapt either through shifting habitat, changing life cycles, or the development of new physical traits;</p> <p>To support the oral testimony of Dr. Neil Aldrin Mallari during the August 2018 inquiry hearing; and</p> <p>To prove the existence, due execution, and other contents of the document</p>
<p><b>“UUUUU” to “UUUUU-6”</b></p>	<p><i>Curriculum Vitae</i> of Neil Aldrin D. Mallari, PhD, consisting of 7 pages</p>	<p>To establish the credibility and expertise of Neil Aldrin Mallari, PhD on the topic he presented; and</p> <p>To prove the existence and contents of the document</p>
<p><b>“VVVVV” to “VVVVV-16”</b></p>	<p>Printed PowerPoint Presentation of Neil Aldrin Mallari, entitled “Biodiversity and</p>	<p>To prove that Philippines’s biodiversity is vulnerable to the deleterious effects of climate change, specifically that climate</p>

	<p>Climate Change,” consisting of 17 pages</p>	<p>change affects ecosystems and species’ ability to adapt and so biodiversity loss increases;</p> <p>To prove that climate change is already forcing biodiversity to adapt either through shifting habitat, changing life cycles, or the development of new physical traits;</p> <p>To support the oral testimony of Dr. Neil Aldrin Mallari during the August 2018 inquiry hearing; and</p> <p>To prove the existence and other contents of the document</p>
<p>“WWWWW” to “WWWWW-5”</p> <p>“WWWWW-5-A”</p>	<p>Statement of Dr. Jonathan Moses C. Jadloc dated 08 August 2018, consisting of 6 pages</p> <p>Signature of Dr. Jonathan Moses C. Jadloc</p>	<p>To prove that climate change negatively impacts the health, specifically the human body;</p> <p>To show the effects climate change in the carnal human body and to expound on the pathophysiology of heat stress, air pollution effects, zika virus and microcephaly; and</p> <p>To prove the existence, due execution, and other contents of the document</p>
<p>“XXXXX” to “XXXXX-2”</p>	<p><i>Curriculum Vitae</i> of Dr. Jonathan Moses C. Jadloc, consisting of 3 pages</p>	<p>To establish the credibility and expertise of Dr. Jonathan Moses C. Jadloc on the topic he discussed; and</p>



		To prove the existence and contents of the document
<p><b>“YYYYY” to “YYYYY-12”</b></p>	<p>Printed PowerPoint Presentation of Dr. Jonathan Moses C. Jadloc, “The Consequential Demise of the Human Body in Climate Crisis,” consisting of 13 pages</p>	<p>To prove that climate change negatively impacts the health, specifically the human body;</p> <p>To show the effects climate change in the carnal human body and to expound on the pathophysiology of heat stress, air pollution effects, zika virus and microcephaly;</p> <p>To prove that climate change is a medical emergency;</p> <p>To support the oral testimony of Dr. Jonathan Moses C. Jadloc during the August inquiry hearing; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“ZZZZZ” to “ZZZZZ-5”</b></p> <p><b>“ZZZZZ-5-A”</b></p>	<p>Statement of Glenn Stuart Hodes dated 20 August 2018, consisting of 6 pages</p> <p>Signature of Glenn Stuart Hodes</p>	<p>To prove that climate change represents a material risk confronting business and can be acknowledged as a multiplier of other risks;</p> <p>To prove that climate change negatively impacts employment, food security, water access, physical health, psychological wellbeing, among others;</p> <p>To show policy solutions to close climate finance</p>

		<p>and implementation gaps; and</p> <p>To prove the existence, due execution, and other contents of the document</p>
<p><b>“AAAAAA” to “AAAAAA-2”</b></p>	<p><i>Curriculum Vitae</i> of Glenn Stuart Hodes, consisting of 3 pages</p>	<p>To establish the credibility and expertise of Mr. Glenn Stuart Hodes on the topic he presented; and</p> <p>To prove the existence and contents of the document</p>
<p><b>“BBBBBB” to “BBBBBB-1”</b></p>	<p>Publications (Addendum) of Glenn Stuart Hodes, consisting of 2 pages</p>	<p>To establish the credibility and expertise of Mr. Glenn Stuart Hodes on the topic he presented; and</p> <p>To prove the existence and contents of the document</p>
<p><b>“CCCCCC” to “CCCCCC-3”</b></p>	<p>Printed PowerPoint Presentation of Glenn Stuart Hodes, entitled “Valuing climate change impacts its role as a risk multiplier for agricultural livelihoods and policies for promoting more accountability to close gaps in financing and implementing appropriate responses,” consisting of 4 pages</p>	<p>To show the economic costs of climate change impacts, its role as a risk multiplier for agricultural livelihoods, and policies for promoting more accountability to close gaps in financing and implementing appropriate responses;</p> <p>To support the oral testimony of Mr. Glenn Stuart Hodes during the August 2018 inquiry hearing; and</p> <p>To prove the existence and other contents of the document</p>

<p><b>“DDDDDD” to “DDDDDD-15”</b></p> <p><b>“DDDDDD-15-A”</b></p>	<p>Statement of Sophie Marjanac dated 03 August 2018, consisting of 16 pages</p> <p>Signature of Sophie Marjanac</p>	<p>To prove the existence and contents of the papers entitled “Acts of God, Human Influence, and Litigation” and “Extreme weather event attribution science and climate litigation: an essential step in the causal chain?”;</p> <p>To show that event attribution science could have significant impact on identifying the extent to which human activity causes or contributes to climate change and associated impacts;</p> <p>To show that developments in attribution science are improving our ability to detect human influence on extreme weather events. By implication, the legal duties of government, businesses, and others to manage foreseeable harms are broadening and may lead to more climate change litigation; and</p> <p>To prove the existence, due execution, and other contents of the document</p>
<p><b>“EEEEEE” to “EEEEEE-1”</b></p>	<p><i>Curriculum Vitae</i> of Sophie Marjanac, consisting of 2 pages</p>	<p>To establish the credibility and expertise of Ms. Sophie Marjanac to discuss the topic she presented; and</p> <p>To prove the existence and contents of the document</p>

<p><b>“FFFFFF” to “FFFFFF-34”</b> (Contained in the <i>Ex-Parte Manifestation</i> dated 27 June 2018)</p>	<p>Extreme weather event attribution science and climate change litigation: an essential step in the causal chain? by Sophie Marjanac and Lindene Patton dated 19 April 2018, consisting of 35 pages</p>	<p>To prove the existence and contents of the study entitled, “Extreme weather event attribution science and climate change litigation: an essential step in the causal chain?”;</p> <p>To show the interdisciplinary and cross-jurisdictional analysis of the emerging science of extreme weather event attribution (which analyses the human impact on extreme weather events), and the implications this new science may have for the law, litigation and the scope of the duty of care of a range of actors; and</p> <p>To prove other matters contained therein</p>
<p><b>“GGGGGG” to “GGGGGG-12”</b></p>	<p>Printed PowerPoint Presentation of Sophie Marjanac, entitled “Extreme weather event attribution science and climate change litigation,” consisting of 13 pages</p>	<p>In addition to the above purposes, to support the oral testimony of Sophie Marjanac during the August 2018 inquiry hearing; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“HHHHHH” to “HHHHHH-10”</b></p>	<p>Climate change effects on the worst-case storm surge: a case study of Typhoon Haiyan by Izuru Takayabu, et al. dated 04 August 2015,</p>	<p>To show the effects of climate change on the worst case scenario of a storm surge induced by a super typhoon in the present climate investigated through the case study of Typhoon Haiyan (“Yolanda”),</p>

	<p>consisting of 11 pages</p>	<p>specifically showing a result indicative that the worst case scenario of a storm surge in the Gulf of Leyte may be worse by 20%; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“IIIIII” to “IIIIII-1”</b></p>	<p>Municipal Council of Palo, Leyte: Resolution No. 2018-66 entitled, “A Resolution Supporting the Petitioners in their Quest for Climate Justice, and Requesting the Commission on Human Rights to Order Forty Six (46) Largest Greenhouse Gas Producer Corporations to Submit Their Plans on the Steps They Will Undertake to Eliminate, Remedy and Prevent the Devastating Effects of Climate Change in the Philippines, and Further Supporting the Commission on Human Rights on Their Investigation in Relation Thereto,” consisting of 2 pages</p>	<p>To prove the support of the Municipal Council of Palo, Leyte to the Petitioners and the inquiry process being conducted by the Commission; also to show the municipality’s request to the Commission to order all respondents herein to submit plans on the steps they will undertake to eliminate, remedy, and prevent the devastating effects of climate change; and</p> <p>To prove the existence and other contents of the document</p>

<p><b>“JJJJJ”</b></p>	<p>City Council of Tacloban, Leyte: Resolution No. 2018-13-144 entitled, “A Resolution Supporting Greenpeace in Their Quest for Climate Justice and in Their Petition for Investigation of Human Rights Violations or Threat Thereto by Fossil Fuel Producing Companies from the Effects of Their Violations to Environmental Laws,” consisting of 1 page</p>	<p>To prove the support of the City Council of Tacloban City, Leyte to the Petitioners in their quest for climate justice and in having respondents investigated by the Commission for possible human rights violations and threats thereto; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“KKKKKK” to “KKKKKK-2”</b></p>	<p>City Council of Marawi, Lanao del Sur: Resolution No. 99 Series of 2018 entitled, “A Resolution Supporting the Petitioners in their Quest for Climate Justice, and Requesting the Commission on Human Rights to Order Forty Six (46) Largest Green House Gas Producers Corporations to Submit their Plans on the Steps They Will Undertake to Eliminate,</p>	<p>To prove the support of the City Council of Marawi City to the Petitioners and the inquiry process being conducted by the Commission; also to show the City’s request to the Commission to order all respondents herein to submit plans on the steps they will undertake to eliminate, remedy, and prevent the devastating effects of climate change; and</p> <p>To prove the existence and other contents of the document</p>

	<p>Remedy, and Prevent the Devastating Effects of Climate Change in the Philippines, and Further Supporting the Commission on Human Rights on Their Investigation in Relation Thereto,” consisting of 3 pages</p>	
<p><b>“LLLLLL” to “LLLLLL-1”</b></p>	<p>Municipal Council of Capalonga, Camarines Norte: Resolution No. 2018-98 entitled, “A Resolution Supporting Southeast Asia Organization in Their Advocacy and Program on Climate Change,” consisting of 2 pages</p>	<p>To prove the support of the Municipal Council of Capalonga, Camarines Norte to the Petitioners and the inquiry process being conducted by the Commission; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“MMMMMM” to “MMMMMM-5”</b></p> <p><b>“MMMMMM to “MMMMMM-5-A”</b></p>	<p><i>Salaysay ni Marinel S. Ubaldo</i> dated 07 September 2018, consisting of 6 pages</p> <p>Signature of Marinel S. Ubaldo</p>	<p>To prove how the wrath of super typhoon Haiyan impacted her basic human rights and changed her life as a youth, specifically how she juggled her work and school and how she and her family managed to cope with the crisis they have experienced;</p> <p>To support the oral testimony of Ms. Marinel S. Ubaldo during the September 2018 inquiry hearing; and</p>

		To prove the existence, due execution, and other contents of the document
<p><b>“NNNNNN to NNNNNN-5“</b></p> <p><b>“NNNNNN” to “NNNNNN-5-A”</b></p>	<p>Statement of Cristina C. Cocadiz dated 19 September 2018, consisting of 6 pages</p> <p>Signature of Cristina C. Cocadiz</p>	<p>To prove how she survived from the wrath of Hurricane Sandy that struck New York City in October 2012, specifically how the extreme weather event impacted her basic human rights and changed her life and livelihood as a survivor;</p> <p>To support the oral testimony of Ms. Cristina C. Cocadiz during September 2018 inquiry hearing; and</p> <p>To prove the existence, due execution, and other contents of the document</p>
<p><b>“OOOOOO” to “OOOOOO-5”</b></p> <p><b>“OOOOOO” to “OOOOOO-5-A”</b></p>	<p>Statement of Candice A. Sering dated 15 September 2018, consisting of 6 pages</p> <p>Signature of Candice A. Sering</p>	<p>To prove how she survived from the wrath of Hurricane Sandy that struck New York City in October 2012, specifically how the extreme weather event impacted her basic human rights and changed her life and livelihood as a survivor;</p> <p>To support the oral testimony of Ms. Candice A. Sering during September 2018 inquiry hearing; and</p> <p>To prove the existence, due execution, and other contents of the document</p>





	<p>consisting of 2 pages</p>	<p>Lofts to discuss the topics on Economic, Social, and Cultural Rights (ESCR) and Climate Change and how Climate Change acts as a threat multiplier; and</p> <p>To prove the existence and contents of the document</p>
<p><b>“RRRRRR” to “RRRRRR-10”</b></p>	<p>Printed PowerPoint Presentation of Katherine Lofts, entitled “Economic, Social &amp; Cultural Rights &amp; Climate Change,” consisting of 11 pages</p>	<p>To prove that climate change is a threat multiplier, a clear and massive impediment to the realization of social, economic and cultural human rights;</p> <p>To prove the relationship between climate change and human rights in general terms, and set out the responsibilities of States and corporate actors with respect to climate change-related human rights harms;</p> <p>To prove the Philippines vulnerability to climate change, specifically showing how climate change impacts on specific economic, social, and cultural rights;</p> <p>To support the oral testimony of Katherine Lofts during September 2018 inquiry hearing; and</p> <p>To prove the existence and other contents of the document</p>

<p><b>“SSSSSS” to “SSSSSS-119”</b></p>	<p>Economic, Social &amp; Cultural Rights &amp; Climate Change: A Legal Reference Guide edited by Sébastien Jodoin and Katherine Lofts (2013), consisting of 120 pages</p>	<p>To provide a general introduction to human rights and the international climate change regime, including the relationship between climate change and human rights, specifically depicting “climate change as the greatest challenge of our time”;</p> <p>To provide for the survey of the basic concepts of international human rights law, specifically showing that the right to a healthy environment has been characterized and recognized as a civil and political right, an economic, social, and cultural right, and as a solidarity right;</p> <p>To show that the right to equality and non-discrimination is of prime importance in the context of climate change mitigation and adaptation policies;</p> <p>To show impacts of climate change in specific rights, including, but not limited to: the right to equality and non-discrimination, the rights to work and social security, the right to family life, the right to an adequate standard of living, the right to the highest attainable standard of physical and mental health, the right to</p>
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		To prove the existence, due execution, and other contents of the document
<b>“UUUUUU”</b>	<i>Curriculum Vitae</i> of Kert Davies, consisting of 1 page	To establish the credibility and expertise of Mr. Kert Davies to discuss the topic he presented; and  To prove the existence and contents of the document
<b>“VVVVVV” to “VVVVVV-38”</b>	Printed PowerPoint Presentation of Kert Davies, entitled “Evidence of Fossil Fuel Companies Funding of Climate Science Denial and Climate Policy Interference,” consisting of 39 pages	To show various case studies on what fossil fuel companies, like most of the respondents herein, have known for several decades, the efforts to stall climate policy process, and the specific evidence of corporate funding of climate denial campaigns and organizations;  To prove how fossil fuel companies, trade associations, and other organizations -- most of the respondents herein are part of -- engaged in decades long campaign to undermine climate science and action;  To support the oral testimony of Mr. Kert Davies during the September 2018 inquiry hearing; and  To prove the existence and other contents of the document

<p><b>“WWWWW to WWWWW-8”</b></p>	<p>Bibliography of the PowerPoint Presentation, consisting of 9 pages</p>	<p>To provide the sources of the PowerPoint Presentation; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“XXXXXX to XXXXX-65”</b></p>	<p>Dealing in Doubt: The Climate Denial Machine vs. Climate Science by Greenpeace USA dated September 2013, consisting of 66 pages</p>	<p>To prove the fossil fuel industry’s organized attacks on climate science, scientists and scientific institutions like the UN Intergovernmental Panel on Climate Change (the IPCC) that have gone on for more than 20 years;</p> <p>To show a list of individuals, organizations, and corporate interests who comprise the “climate denial Machine” that have caused harm and have slowed our response time to climate change;</p> <p>To show the Heartland Institute as an example of how tobacco-friendly free market think tanks use a wide range of tactics to wage a campaign against the climate science;</p> <p>To show the range of tricks used by the denier campaign, from “pal review” instead of peer review, to personal attacks on scientists through Freedom of Information requests, self-publishing books, and the general conspiratorial noise from</p>

		<p>the denial machine in the blogosphere;</p> <p>To prove that none of the climate denial machine’s counter-attack has changed the harsh reality, the scientific consensus, that climate change is underway and it is caused by humanity’s pollution -- with significant contribution from respondents herein – and other insults to the planet;</p> <p>To show that a May 2013 peer reviewed study examined more than 11,000 climate change papers, and of the 4,000 papers that discussed whether climate change was caused by human, 97 percent agreed. On the other hand, the percentage of papers challenging this consensus did not increase— it had flatlined, corroborating a similar finding in 2010 from the Proceedings of the National Academy of Sciences; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“YYYYYY to YYYYYY-7”</b></p>	<p>The Cooler Heads Coalition (1998 Global Climate Science Communication Plan) by the Climate</p>	<p>To show the existence of the Cooler Heads Coalition, the longest running climate denial network funded through the years by one of the respondents, ExxonMobil,</p>

	<p>Investigations Center consisting of 8 pages</p>	<p>the Koch Brothers, the Mercers, and others with a goal to stall the implementation of effective climate policy;</p> <p>To show the existence of the Global Climate Science Communication Plan, which was written by a team convened by the American Petroleum Institute (API) -- some of the respondents were a part of the development, like ExxonMobil, Chevron, BP, Shell, ConocoPhillips -- containing strategic campaign document with budgets, fundraising targets, and campaign goals. Specifically, API's plan was created a year after the Kyoto Protocol was signed and developed by representatives from ExxonMobil, Chevron, etc. The plan includes a multi-million-dollar, multi-year budget to create "uncertainty" in the public policy arena with target audiences including the media, policymakers, and science teachers. The plan envisions victory when, among others, average citizens "understand" uncertainties in climate science; recognition of uncertainties becomes part of the "conventional wisdom" and supporters of Kyoto Protocol are viewed as "out of touch with reality"; and</p>
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		To prove the existence and other contents of the document
<b>“ZZZZZZ to ZZZZZZ-1”</b>	Matrix of Exxon Climate Denial Funding 1992-2017 prepared by Climate Investigations Center, consisting of 2 pages	To prove the climate denial funding made by respondent ExxonMobil; and  To prove the existence and other contents of the document
<b>“AAAAAAA to AAAAAA-1”</b>	Climate Files Post Index prepared by Climate Investigations Center, consisting of 2 pages	To provide a list of documents on climate files or dossier of relevant climate-related documents prepared by the Climate Investigations Center, which includes the fossil fuel companies and industry’s climate denial efforts, funding, and activities that undermine climate science; and  To prove the existence and other contents of the document
<b>“BBBBBBB” to “BBBBBBB-6”</b>  <b>“BBBBBBB” to “BBBBBBB-6-A”</b>	Statement of Sharon Eubanks dated 10 September 2018, consisting of 7 pages  Signature of Sharon Eubanks	To show the summary of the federal tobacco case in the United States, explain the basis of the tobacco company’s accountability for the health impacts of smoking, correlate it with the climate deception being undertaken by respondent Carbon Majors (similarities in the corporate behavior of the tobacco industry and the fossil fuel industry);

		<p>To show that just as with the tobacco industry, recently uncovered documents support the determination that the fossil fuel industry deceived the public and investors about climate change; and</p> <p>To prove the existence, due execution, and other contents of the document</p>
<p><b>“CCCCCCC” to “CCCCCCC-3”</b></p>	<p><i>Curriculum Vitae</i> of Sharon Eubanks, consisting of 4 pages</p>	<p>To establish the credibility and expertise of Sharon Eubanks to discuss the topic she presented; and</p> <p>To prove the existence and contents of the document</p>
<p><b>“DDDDDDD” to “DDDDDDD-4”</b></p>	<p>Printed PowerPoint Presentation of Sharon Eubanks, entitled “Statement of Sharon Y. Eubanks,” consisting of 5 pages</p>	<p>To show the summary of the federal tobacco case in the United States, explain the basis of the tobacco company’s accountability for the health impacts of smoking, correlate it with the climate deception being undertaken by respondent Carbon Majors (similarities in the corporate behavior of the tobacco industry and the fossil fuel industry);</p> <p>To show that just as with the tobacco industry, recently uncovered documents support the determination that the fossil fuel industry deceived the public and investors about climate change;</p>



		<p>how warmer ocean temperatures sustain and intensify a hurricane and assess increases in the precipitation; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“FFFFFFF” to “FFFFFFF-1”</b></p>	<p><i>Curriculum Vitae</i> of Brenda Ekwurzel, PhD, consisting of 2 pages</p>	<p>To establish the credibility and expertise of Brenda Ekwurzel, PhD to discuss the topic she presented; and</p> <p>To prove the existence and contents of the document</p>
<p><b>“GGGGGGG” to “GGGGGGG-20”</b></p>	<p>Printed PowerPoint Presentation of Brenda Ekwurzel, entitled “Presentation for the Republic of the Philippines Commission on Human Rights National Inquiry on Climate Change fourth round of public hearings (New York, USA, 27 September 2018), consisting of 21 pages</p>	<p>To prove that the proportional increase in atmospheric carbon dioxide, GMST, and GSL - - key indicators of human impact on the global environment -- from emissions traced to 90 major carbon producers (47 of which are respondents herein) is quantifiable and substantial;</p> <p>To prove that the analyses in the above findings could be extended to examine the contribution of emissions traced to major carbon producers to other impacts;</p> <p>To prove that attribution science now can assess the increased likelihood of a specific extreme weather event occurring and evaluate the percent of an</p>

		<p>event’s heat-related mortality to human-induced climate change;</p> <p>To prove that attribution studies for hurricanes (also called typhoons or cyclones) link additional flooding from rising sea levels to human-induced climate change, as well as how warmer ocean temperatures sustain and intensify a hurricane and assess increases in the precipitation;</p> <p>To support the oral testimony of Brenda Ekwurzel during September 2018 inquiry hearing; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“HHHHHHH” to “HHHHHHH-105”</b></p>	<p>Impacts of Climate Change on Household Food Security in the Philippines by Celia Reyes, et al. dated December 2014, consisting of 106 pages</p>	<p>To show the existence and contents of a technical report that: (1) examines the nature and extent of vulnerability of households in the Philippines to the impacts of climate change on food security; (2) profiles vulnerable groups using available data; (3) analyzes available regional, provincial, municipal/city, and household level indicators of vulnerability to food insecurity; (4) identifies channels and indicators of the impacts of climate change on food security; (5) and assesses</p>

		<p>the relative efficiency of different policy tools or adaptation measures simulating a range of policy options;</p> <p>To prove that change in climate variables likely transmit its effects on the households through farming income in the form of food insecurity;</p> <p>To prove that changes in temperature lead to increased vulnerability to food insecurity which is also true in some of the provinces in the country. Changes in level of rainfall, on the other hand, will increase vulnerability in some parts of the country; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“IIIIII” to “IIIIII-49”</b></p>	<p>People’s Climate Budget 2016: An Overview Document of the Philippine Climate Budget by the Department of Budget and Management and Climate Change Commission, consisting of 50 pages</p>	<p>To show the existence and contents of the Philippine Climate Budget for 2016, specifically detailing a climate budget system to strengthen the planning, execution, and financing framework for the government’s climate response;</p> <p>To show a summary of the total amount of national government financing directed towards attaining climate change adaptation and mitigation objectives</p>

		<p>and outcomes, as detailed in the government’s National Climate Change Action Plan (NCCAP) strategic priorities; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“JJJJJJ” to “JJJJJJ-11”</b></p>	<p>Agricultural Growth and Climate Resilience in the Philippines: Subnational Impacts of Selected Investment Strategies and Policies by Timothy S. Thomas, et al. dated September 2015, consisting of 12 pages</p>	<p>To show the impacts of climate change in Philippine agriculture, specifically finding that, at the sector level, the largest quantitative economic impact of climate change is on agriculture;</p> <p>To show the results of bio-physical and economic modeling analyses presented in the forthcoming International Food Policy Research Institute (IFPRI) and National Economic and Development Authority (NEDA) manuscript, The Future of Philippine Agriculture: Scenarios, Policies, and Investments under Climate Change; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“KKKKKKK” to “KKKKKKK-41”</b></p>	<p>Accounting for Health Impacts of Climate Change by Asiand Development Bank and Swedish International</p>	<p>To show the relation between health and climate change; specifically, with projected increases in temperature, changes in rainfall patterns, and increase in the frequency</p>

	<p>Development Cooperation Agency (2011), consisting of 42 pages</p>	<p>and/or intensity of tropical cyclones and storms, climate change is expected to impact almost every sector of human and economic activity, in every region of the world, and in every community, including the public health community;</p> <p>To show the importance of explicitly accounting for the health impacts of investment projects in sectors such as agriculture and water; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“LLLLLLL” to “LLLLLLL-132”</b></p>	<p>Adapting to Climate Change in Europe and Central Asia by the World Bank dated 01 June 2009, consisting of 133 pages</p>	<p>To show a framework for developing climate adaptation plans which may prove beneficial for the country;</p> <p>To show that extreme weather events, such as floods and droughts, are the most immediate and obvious health risks— and projections indicate these events will become more intense and frequent; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“MMMMMMM” to “MMMMMMM-1”</b></p>	<p>List of lawsuits citing documents maintained by Kert Davies of Climate Investigations</p>	<p>To show a list of lawsuits mentioned by Mr. Kert Davies in his oral testimony; and</p>



	Center, consisting of 2 pages	To prove the existence and other contents of the document
<p>“NNNNNNN” to “NNNNNNN-6”</p> <p>“NNNNNNN-6-A”</p>	<p>Statement of Ms. Marielle Trixie J. Bacason dated 22 October 2018, consisting of 7 pages</p> <p>Signature of Ms. Marielle Trixie J. Bacason</p>	<p>To prove how the wrath of super typhoon Haiyan impacted her basic human rights and changed her life as a youth who migrated to London to support herself and her family after the occurrence of the extreme weather event;</p> <p>To show how she and her family managed to cope with the crisis they have experienced from the devastating effects of super typhoon Haiyan;</p> <p>To support the oral testimony of Ms. Marielle Trixie Bacason during November 2018 inquiry hearing; and</p> <p>To prove the existence, due execution, and other contents of the document</p>
<p>“OOOOOOO” to “OOOOOOO-1”</p>	<p><i>Curriculum Vitae</i> of Mark Campanale, consisting of 2 pages</p>	<p>To establish the credibility and expertise of Mr. Mark Campanale on the topic how much carbon dioxide can be released to the atmosphere and whether the supply options of the largest publicly traded oil and gas producers are aligned with demand levels consistent with various scenarios of carbon constraint, resulting in different climate outcomes (using a tool:</p>

		<p><a href="http://2degreeseperation.com">http://2degreeseperation.com</a>); and</p> <p>To prove the existence and contents of the document</p>
<p><b>“PPPPPPP” to “PPPPPPP-1”</b></p>	<p><i>Curriculum Vitae</i> of Andrew Grant, consisting of 2 pages</p>	<p>To establish the credibility and expertise of Mr. Mark Campanale on the topic how much carbon dioxide can be released to the atmosphere and whether the supply options of the largest publicly traded oil and gas producers are aligned with demand levels consistent with various scenarios of carbon constraint, resulting in different climate outcomes (using a tool: <a href="http://2degreeseperation.com">http://2degreeseperation.com</a>); and</p> <p>To prove the existence and contents of the document</p>
<p><b>“QQQQQQQ” to “QQQQQQQ-5”</b></p>	<p>Printed PowerPoint of Mark Campanale and Andrew Grant, entitled “National Inquiry on the Impact of Climate Change on the Human Rights of the Filipino People,” consisting of 6 pages</p>	<p>To show how much carbon dioxide can be released to the atmosphere and whether the supply options of the largest publicly traded oil and gas producers are aligned with demand levels consistent with various scenarios of carbon constraint, resulting in different climate outcomes (using a tool: <a href="http://2degreeseperation.com">http://2degreeseperation.com</a>);</p> <p>To show how much fossil fuel reserves are being held by some of the respondents herein;</p>

		<p>To support the oral testimonies of Mr. Mark Campanale and Mr. Andrew Grant during November 2018 inquiry hearing; and</p> <p>To prove the existence and contents of the document</p>
<p><b>“RRRRRRR” to “RRRRRRR-30”</b></p>	<p>The \$2 Trillion Stranded Assets Danger Zone: How Fossil Fuel Firms Risk Destroying Investor Returns by the Carbon Tracker (November 2015), consisting of 31 pages</p>	<p>To show a summary of the overhang of unneeded capex (through 2025) and avoided CO<sub>2</sub> (through 2035) across the 3 fossil fuels a 2°C-compliant 450 Scenario, compared to business as usual indicated in the industry databases, which makes the difference in financial and carbon significance clear;</p> <p>To show that over \$2 Trillion of capex needs to not be approved in order to avoid around 156 GtCO<sub>2</sub> of emissions— equivalent of cutting supply and the subsequent emissions by around a quarter in the markets;</p> <p>To show that oil represents around two-thirds of the financial risk but a fifth of the carbon risk, whilst coal carries around half of the carbon risk, but only a tenth of the financial risk.</p> <p>To prove the existence and contents of the document</p>

<p><b>“SSSSSSS” to “SSSSSSS-35”</b></p>	<p>2 Degrees of Separation: Transition Risk for Oil and gas in a Low Carbon World by James Leaton and Andrew Grant of Carbon Tracker, consisting of 36 pages</p>	<p>To show new analysis that provides a way of understanding whether the supply options of the largest publicly traded oil and gas producers are aligned with demand levels consistent with a 2 degree Celsius (2D) carbon budget;</p> <p>To provide a snapshot of the potentially unneeded capital expenditure (capex) spent for 69 global oil and gas companies – highlighting for the first time the wide-ranging degree of exposure among companies in the sector;</p> <p>To show that US\$2.3 Trillion (around one third) of potential capex to 2025 should not be deployed in a 2 degree scenario compared to business as usual expectations;</p> <p>To show that two thirds of the potential oil and gas production which is surplus to requirements in a 2 degree scenario is controlled by the private sector; and</p> <p>To prove the existence and contents of the document</p>
<p><b>“TTTTTTT” to “TTTTTTT-19”</b></p>	<p>2 Degrees of Separation: Company-Level Transition Risk July 2018 Update by the Carbon</p>	<p>To provide a framework for estimation of the relative transition risk to a universe of major oil and gas producers, looking through the lens of capital</p>

	<p>Tracker, consisting of 20 pages</p>	<p>expenditure that might in future be committed to high cost projects that would be outside a 2°C pathway for their products – a 2°C “budget” in aggregate; and</p> <p>To prove the existence and contents of the document</p>
<p><b>“UUUUUUU” to “UUUUUUU-100”</b></p>	<p>Under the Microscope: Are Companies’ Climate Scenario Analyses Meeting Investors’ Requirements? by the Carbon Tracker dated May 2018, consisting of 101 pages</p>	<p>To show that, almost universally, the largest oil and gas companies are not planning on a world consistent with well-below 2°C;</p> <p>To show that the emissions pathway of Shell’s Sky Scenario, which takes until the early-2030s for emissions to fall below today’s level, highlights a reluctance within the industry to stretch its thinking about how energy markets might evolve, at least in the near term;</p> <p>To show that climate change is effectively market risk for fossil fuel companies and scenarios must grapple with this reality;</p> <p>To provide analysis that seeks to assist investors with their navigating of companies’ climate-related disclosure;</p> <p>To show companies’ disclosure according to four key themes: 2°C</p>



		To prove the existence, due execution, and other contents of the document
<b>“WWWWWWW” to “WWWWWWW-12”</b>	<i>Curriculum Vitae</i> of Henry Shue, consisting of 13 pages	To establish the credibility and expertise of Henry Shue to discuss the topic he discussed; and  To prove the existence and contents of the document
<b>“XXXXXXX” to “XXXXXXX-7”</b>	Responsible for What? Carbon Producer CO <sub>2</sub> Contributions and the Energy Transition by Henry Shue dated 07 September 2017, consisting of 8 pages	To prove respondents’ responsibility, specifically, mere negative responsibility to “do no harm” required them to reduce that harm rapidly either by modifying the product in order to capture its dangerous emissions or by developing safe substitutes to perform the same function, that is, by developing non-carbon-based forms of energy;  To show that the seriousness of the harms brought by climate change made respondents’ responsibility especially compelling;  To show that the half century of failure by corporate carbon producers -- respondents herein -- to reduce the harms caused by their products now gives them additional responsibility to correct the damage done by their decades of neglect of the underlying negative responsibility; and

		To prove the existence and other contents of the document
<b>“YYYYYYYY” to “YYYYYYYY-7”</b>	Certificates for CCS at reduced Public Cost: Securing the UK’s Energy and Climate Future, Energy Bill 2015 by Prof. Myles Allen, et al. dated 09 September 2015, consisting of 8 pages	To show that to stabilize global temperatures, the only alternative to CO2 disposal is a global ban on all fossil fuel extraction and use;  To show an opinion from Prof. Myles concerning Carbon Capture and Storage (CCS) Certificate scheme;  and  To prove the existence and other contents of the document
<b>“ZZZZZZZ” to “ZZZZZZZ-13”</b>	Climate Dreaming: Negative Emissions, Risk Transfer, and Irreversibility by Henry Shue dated September 2017, consisting of 14 pages	To show that carbon emissions reduction must continue to be the central goal for addressing climate change, as a heavy reliance on negative emissions technologies (NETs) in the future, if used as a means to allow continued use of fossil fuels in the present, is extremely risky, as our ability to stabilize the climate at <2°C declines as cumulative emissions increase;  To show that a failure of NETs to deliver expected mitigation in the future, due to any combination of biophysical and economic limits, leaves us with no



		<p>‘Plan B’; ‘Plan A’ must be to immediately and aggressively reduce GHG emissions;</p> <p>To show that the integrated assessment models used by the Intergovernmental Panel on Climate Change relied on negative emissions technologies (NETs), like the Bio-energy combined with Carbon Capture and Storage (BECCS), are not an insurance policy, but rather an unjust and high-stakes gamble; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“AAAAAAAAA” to “AAAAAAAAA-6”</b></p> <p><b>“AAAAAAAAA-6-A”</b></p>	<p><i>Salaysay ni Bb. Veronica V. Cabe</i> dated 22 October 2018, consisting of 7 pages</p> <p>Signature of Bb. Veronica V. Cabe</p>	<p>To prove how she survived from various typhoons that hit the Philippines, especially typhoon Ondoy/Ketsana on 26 September 2009, how these extreme weather events impacted her life and her family’s basic human rights, and how it changed their lives and livelihood as survivors;</p> <p>To support the oral testimony of Ms. Veronica Cabe during the November 2018 inquiry hearing; and</p> <p>To prove the existence, due execution, and other contents of the document</p>

<p><b>“BBBBBBBB” to “BBBBBBBB-3”</b></p> <p><b>“BBBBBBBB-3-A”</b></p>	<p>Statement of Dr. Roda Verheyen dated 18 October 2018, consisting of 4 pages</p> <p>Signature of Roda Verheyen</p>	<p>To prove that carbon majors are now being held to account through different cases filed against them either jointly or separately;</p> <p>To show three (3) recent climate change litigation cases Dr. Verheyen is handling, one is that of a Peruvian farmer's case against RWE;</p> <p>To show the “Urgenda” case in the Netherlands, which is distinct but also related, and in which the relevance of human rights with respect to the impacts of climate change has just been confirmed by an appellate court in The Hague; and</p> <p>To prove the existence, due execution, and other contents of the document</p>
<p><b>“CCCCCCCC”</b></p>	<p><i>Curriculum Vitae</i> of Dr. Roda Verheyen, LLM, consisting of 1 page</p>	<p>To establish the credibility and expertise of Dr. Roda Verheyen, LLM, to discuss the topic she presented; and</p> <p>To prove the existence and contents of the document</p>
<p><b>“DDDDDDDD” to “DDDDDDDD-7”</b></p>	<p>Printed PowerPoint Presentation of Roda Verheyen, entitled “Climate and Human Rights: Four Cases from Europe,” consisting of 8 pages</p>	<p>To prove that carbon majors and laggard governments in European countries are now being held to account through different cases filed against them either jointly or separately;</p>

		<p>To show three (3) recent climate change litigation cases Dr. Verheyen is handling, one is that of a Peruvian farmer's case against RWE;</p> <p>To show the “Urgenda” case in the Netherlands, which is distinct but also related, and in which the relevance of human rights with respect to the impacts of climate change has just been confirmed by an appellate court in The Hague;</p> <p>To support the testimony of Dr. Roda Verheyen during the November 2018 inquiry hearing; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“EEEEEEEE” to “EEEEEEEE-38”</b></p>	<p>Claim by Mr. Saúl Ananías Luciano Lliuya, Provincia de Huaraz, Peru against RWE AG, represented by CEO Mr. Peter Terium dated 23 November 2015, consisting of 39 pages</p>	<p>To prove that there is an ongoing civil action in Germany concerning the impacts of climate change against one of the respondents herein (RWE); and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“FFFFFFFF” to “FFFFFFFF-6”</b></p>	<p>Transcript of the Decision: Mr. Saúl Ananías Luciano Lliuya, Provincia de Huaraz, Peru v.</p>	<p>To prove the existence and contents of the transcript of the decision rendered by a lower court in the aforementioned legal</p>

	RWE AG, represented by the Chairman of the Executive Board, Dr. Rolf Martin Schmitz, consisting of 7 pages	action filed against respondent RWE; and  To prove other matters contained therein
<b>“GGGGGGGGG” to “GGGGGGGGG-3”</b>	Higher Regional Court of Hamm Indicative Court Order and Order for the Hearing of Evidence: Mr. Saúl Ananías Luciano Lliuya, Provincia de Huaraz, Peru v. RWE AG, represented by the Chairman of the Executive Board, Dr. Rolf Martin Schmitz dated 30 November 2017, consisting of 4 pages	To prove the existence and contents of the decision of the Higher Regional Court of Hamm Indicative Court Order when the case was appealed, which allowed for the claimant to present his evidence against respondent RWE; and  To prove other matters contained therein
<b>“HHHHHHHHH” to “HHHHHHHHH-3”</b>	Climate Change Could Destroy This Peruvian Farmer’s Home. Now He’s Suing a European Energy Company for Damages by Ciara Nugent dated 05 October 2018 consisting of 4 pages	To prove that there is an ongoing civil action in Germany concerning the impacts of climate change against one of the respondents herein (RWE); and  To prove the existence and other contents of the document
<b>“IIIIIIII” to “IIIIIIII- 4”</b>	Armando Ferrão Carvalho v. The European Parliament (The Council):	To prove the existence and contents of one of the climate cases represented by Dr. Roda Verheyen, filed by 36 individuals

	<p>Summary of the Pleas in Law and the Main Arguments Relied on in the Application, consisting of 5 pages</p>	<p>against the European Parliament, known as “The People’s Climate Case,” which challenges the European Union’s climate target for 2030 because it is inadequate with respect to the real need to prevent dangerous climate change and not enough to protect the citizens and their fundamental rights of life, health, occupation and property; and</p> <p>To prove other matters contained therein</p>
<p><b>“JJJJJJJ” to “JJJJJJJ-3”</b></p>	<p>Frequently Asked Questions About the People’s Climate Case, consisting of 4 pages</p>	<p>To prove the existence and contents of one of the climate cases represented by Dr. Roda Verheyen, filed by 36 individuals against the European Parliament, known as “The People’s Climate Case,” which challenges the European Union’s climate target for 2030 because it is inadequate with respect to the real need to prevent dangerous climate change and not enough to protect the citizens and their fundamental rights of life, health, occupation and property;</p> <p>To show answers to some frequently asked questions about the People’s Climate Case; and</p> <p>To prove other matters contained in the document</p>

<p><b>“KKKKKKKK” to “KKKKKKKK-54”</b></p>	<p>Decision of the Hague District Court: Urgenda Foundation vs. The State of Netherlands (Ministry of Infrastructure and the Environment Case No: C/09/456689/ HA ZA 13-1396 dated 24 June 2015, consisting of 55 pages</p>	<p>To prove the existence and contents of the decision of the Hague District Court: Urgenda Foundation v. The State of Netherlands, specifically upholding the State’s responsibility to take more action to reduce the greenhouse gas emissions; and</p> <p>To prove other matters contained in the document</p>
<p><b>“LLLLLLLL” to “LLLLLLLL-19”</b></p>	<p>“Decision of the Hague Court of Appeal: The State of the Netherlands v. Urgenda Foundation Case No: C/09/456689/ HA ZA 13-1396” dated 09 October 2018, consisting of 20 pages</p>	<p>To prove the existence and contents of the decision of the Hague Court of Appeal when The State of the Netherlands appealed the aforementioned case; and</p> <p>To prove other matters contained in the document</p>
<p><b>“MMMMMMMM” to “MMMMMMMM-17”</b></p> <p><b>“MMMMMMMM-14-A”</b></p>	<p>Statement of Resource Person, Dylan Tanner dated 06 November 2018, consisting of 18 pages</p> <p>Signature of Dylan Tanner</p>	<p>To show the InfluenceMap’s thorough analysis that shows some of the respondent Carbon Majors, operating both individually and through global networks of lobby groups, continue to systematically oppose ambitious and urgently needed climate policy as recommended by the IPCC and proposed by bodies mandated to tackle climate change;</p> <p>To show a summary of climate denial and</p>

		<p>deception by the fossil fuel value chain;</p> <p>To prove the systematic opposition by the fossil fuel industry which continued through 2018, even following the IPCC report of October 2018, which stresses the urgent need for action to prevent climate change causing future catastrophic losses and damage to global societal, economic and natural systems;</p> <p>To show that it is highly likely that past and current inconsistent behavior by respondent Carbon Majors with regard to their official stances and internal activities on climate policy indicates deliberate strategies of deception, suggesting their potential liability for the damages caused by this deception; and</p> <p>To prove the existence and other contents of the document</p>
<p>“NNNNNNNN”</p>	<p><i>Curriculum Vitae</i> of Dylan Tanner, consisting of 1 page</p>	<p>To establish the credibility and expertise of Dr. Dylan Tanner to discuss the topic he presented;</p> <p>To prove the existence and contents of the document</p>
<p>“OOOOOOOO” to “OOOOOOOO-10”</p>	<p>Printed PowerPoint Presentation of Dylan Tanner</p>	<p>To show the InfluenceMap’s thorough analysis that shows some</p>

	<p>entitled, “Petition Requesting for Investigation of the Responsibility of the Carbon Majors for Human Rights Violations or Threats of Violations Resulting from the Impacts of Climate Change,” consisting of 11 pages</p>	<p>of the respondent Carbon Majors, operating both individually and through global networks of lobby groups, continue to systematically oppose ambitious and urgently needed climate policy as recommended by the IPCC and proposed by bodies mandated to tackle climate change;</p> <p>To prove the systematic opposition by the fossil fuel industry which continued through 2018, even following the IPCC report of October 2018, which stresses the urgent need for action to prevent climate change causing future catastrophic losses and damage to global societal, economic and natural systems;</p> <p>To show that it is highly likely that past and current inconsistent behavior by respondent Carbon Majors with regard to their official stances and internal activities on climate policy indicates deliberate strategies of deception, suggesting their potential liability for the damages caused by this deception;</p> <p>To support the testimony of Dr. Dylan Tanner during the November 2018 inquiry hearing; and</p>
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		To prove the existence and other contents of the document
<p><b>“PPPPPPPP” to “PPPPPPPP-2”</b></p> <p><b>“PPPPPPPP-2-A”</b></p>	<p>Statement of Myles Allen consisting of 3 pages</p> <p>Signature of Myles Allen</p>	<p>To show all of the observed warming since 1850 can be considered anthropogenic, with about 80% of that warming due to carbon dioxide emissions;</p> <p>To show how the size and impact of the storm surge associated with an extreme typhoon may have been exacerbated by anthropogenic climate change; and</p> <p>To prove the existence, due execution, and other contents of the document</p>
<p><b>“QQQQQQQQ” to “QQQQQQQQ-2”</b></p>	<p><i>Curriculum Vitae</i> of Dr. Myles Allen, consisting of 3 pages</p>	<p>To establish the credibility and background of expertise of Dr. Myles Allen; and</p> <p>To prove the existence and contents of the document</p>
<p><b>“RRRRRRRR” to “RRRRRRRR-12”</b></p>	<p>Printed PowerPoint Presentation of Myles Allen, entitled “Attributing Harm to Greenhouse Gas Emissions: Principles and Current Status,” consisting of 13 pages</p>	<p>To prove how human and natural influences on climate contribute to observed climate change and extreme weather risk;</p> <p>To show that we are at 1°C (±0.2°C), warming at 0.2°C per decade, and our best estimate is that all of this warming is due to human influence (natural factors contribute occasional cooling spikes,</p>

		<p>but little centennial warming);</p> <p>To show that Philippines, based on climate modelling and empirical analysis of growth and climate data over the past 40 years, is projected to experience reduced economic growth relative to present at both 1.5°C and 2°C of warming, with the reduction worse at 2°C;</p> <p>To support the testimony of Myles Allen during November 2018 inquiry hearing; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“SSSSSSSS” to “SSSSSSSS-1”</b></p> <p><b>“SSSSSSSS-1-A”</b></p>	<p>Statement of Paul Ekins consisting of 2 pages</p> <p>Signature of Paul Ekins</p>	<p>To show the single integrated assessment model that contains estimates of the quantities, locations and nature of the world’s oil, gas and coal reserves and resources, and which is shown to be consistent with a wide variety of modelling approaches with different assumptions, to explore the implications of this emissions limit for fossil fuel production in different regions;</p> <p>To show that, globally, a third of oil reserves, half of gas reserves and over 80% of current coal reserves should remain unused from 2010 to 2050 in order to</p>

		<p>meet the target of 2°C, but more of these oil, gas, and coal reserves are needed to be kept in the ground with a 1.5°C target;</p> <p>To prove the existence and summary of the contents of the paper he co-authored, entitled “The geographical distribution of fossil fuels unused when limiting global warming to 2°C,” published on 07 January 2015 at the Nature, an international journal of science; and</p> <p>To prove the existence, due execution, and other contents of the document</p>
<p><b>“TTTTTTTTT” to “TTTTTTTTT-65”</b></p>	<p><i>Curriculum Vitae</i> of Paul Ekins, consisting of 66 pages</p>	<p>To establish the credibility and expertise of Paul Ekins to discuss the topic he presented; and</p> <p>To prove the existence and contents of the document</p>
<p><b>“UUUUUUUU” to “UUUUUUUU-6”</b></p>	<p>Printed PowerPoint Presentation of Paul Ekins, entitled “Fossil Fuel Risks: What Remains Unburnt When Staying Below 2°C?”, consisting of 7 pages</p>	<p>To show the single integrated assessment model that contains estimates of the quantities, locations and nature of the world’s oil, gas and coal reserves and resources, and which is shown to be consistent with a wide variety of modelling approaches with different assumptions, to explore the implications of this emissions limit for fossil</p>

		<p>fuel production in different regions;</p> <p>To show that, globally, a third of oil reserves, half of gas reserves and over 80% of current coal reserves should remain unused from 2010 to 2050 in order to meet the target of 2°C, but more of these oil, gas, and coal reserves are needed to be kept in the ground with a 1.5°C target;</p> <p>To prove the existence and summary of the contents of the paper he co-authored, entitled “The geographical distribution of fossil fuels unused when limiting global warming to 2°C,” published on 07 January 2015 at the Nature, an international journal of science; and</p> <p>To support the oral testimony of Dr. Paul Ekins during the November 2018 hearing; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“VVVVVVVV” to “VVVVVVVV-15”</b></p>	<p>The geographical distribution of fossil fuels unused when limiting global warming to 2°C by Christophe McGlade and Paul Ekins 08 January 2015, consisting of 16 pages</p>	<p>To show the single integrated assessment model that contains estimates of the quantities, locations and nature of the world’s oil, gas and coal reserves and resources, and which is shown to be consistent with a wide variety of modelling approaches with different</p>

		<p>assumptions, to explore the implications of this emissions limit for fossil fuel production in different regions;</p> <p>To show that, globally, a third of oil reserves, half of gas reserves and over 80% of current coal reserves should remain unused from 2010 to 2050 in order to meet the target of 2°C, but more of these oil, gas, and coal reserves are needed to be kept in the ground with a 1.5°C target;</p> <p>To show that, although there have previously been fears over the scarcity of fossil fuels, in a climate-constrained world this is no longer a relevant concern: large portions of the reserve base and an even greater proportion of the resource base should not be produced if the temperature rise is to remain below 2°C; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“WWWWWWW” to “WWWWWWW- 14”</b></p>	<p>Statement of Resource Persons, Mark Campanale and Andrew Grant, dated 28 October 2018, consisting of 15 pages</p>	<p>To show the in-depth analysis of Carbon Tracker, an independent financial think tank, on the impact of the energy transition on capital markets and the potential investment in high-cost, carbon-intensive fossil fuels;</p>

		<p>To prove how much carbon dioxide can be released to the atmosphere and whether the supply options of the largest publicly traded oil and gas producers are aligned with demand levels consistent with various scenarios of carbon constraint, resulting in different climate outcomes (using a tool: <a href="http://2degreeseperation.com">http://2degreeseperation.com</a>); and</p> <p>To prove the existence, due execution, and other contents of the document</p>
<p><b>“XXXXXXXXX” to “XXXXXXXXX-12”</b></p>	<p>“Application and Complaint: Greenpeace e.V. and family farmers, represented by the Board (Roland Hipp, Sweelin Heuss and Martin Kaiser), Hong Kongstrasse 10, 20457 Hamburg against the Federal Government of the Federal Republic of Germany, Federal Chancel” dated 25 October 2018, consisting of 13 pages</p>	<p>To prove the existence and contents of a complaint filed by Greenpeace Germany and family farmers regarding climate protection target 2020 and Action Programme for Climate Protection 2020 (40% reduction of greenhouse gas emissions compared to 1990 by the end of 2020);</p> <p>To support the testimony of Dr. Roda Verheyen during the November 2018 inquiry hearing; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“YYYYYYYYY” to “YYYYYYYYY-2”</b></p>	<p>Statement of Atty. Kristin Casper, dated 03 October 2018, consisting of 3 pages</p>	<p>To clarify the development of Mr. Richard Heede’s independent Carbon Majors research and the involvement of Greenpeace International and others in</p>

<p><b>“YYYYYYYYY-2-A”</b></p>	<p>Signature of Atty. Kristin Casper</p>	<p>commissioning verification of the methodology and results; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“ZZZZZZZZ” to “ZZZZZZZZ-171”</b></p>	<p>Supplementary Memorandum to the Commission by Resource Person Katherine Lofts, Research Associate, Law, Governance &amp; Society Lab at McGill University, consisting of 172 pages</p>	<p>To supplement the previous statement of Katherine Lofts to have further information in written form outlining climate change-related cases that have incorporated human rights considerations; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“AAAAAAAAA” to “AAAAAAAAA-10”</b> (also marked as <b>Exhibit “HHHHHH” to “HHHHHH-10”</b>)</p>	<p>Climate change effects on the worst-case storm surge: a case study of Typhoon Haiyan by Izuru Takayabu, et al. dated 04 August 2015, consisting of 11 pages</p>	<p>To show the effects of climate change on the worst case scenario of a storm surge induced by a super typhoon in the present climate investigated through the case study of Typhoon Haiyan (“Yolanda”), specifically showing a result indicative that the worst case scenario of a storm surge in the Gulf of Leyte may be worse by 20%; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“BBBBBBBBB” to “BBBBBBBBB-1”</b></p>	<p>Early oil industry knowledge of CO<sub>2</sub></p>	<p>The show the existence and summary of the documents</p>

	<p>and global warming by Ben Franta dated 19 November 2018, consisting of 2 pages</p>	<p>unearthed regarding the fossil fuel industry’s knowledge, which “archival discoveries add to the growing body of information regarding fossil fuel producers’ knowledge of climate science over time;</p> <p>To show better understanding of the history of climate policy efforts and assessing<sup>[L]</sup>the responsibilities of fossil fuel producers today; and</p> <p>To prove the existence and other contents of the document</p>
<p>“CCCCCCCCCC” to “CCCCCCCCCC-3”</p> <p>“CCCCCCCCCC-3-A”</p>	<p><i>Saysay ni Gng. Amalia Bahian</i> dated 03 December 2018, consisting of 4 pages (Cebuano with English translation)</p> <p>Signature of Gng. Amalia Bahian</p>	<p>To show a mother who experienced the wrath of tropical storm Sendong (internationally known as “Washi”) that hit Iligan City on December 2011 and how she coped with the traumatic ordeal of losing three (3) children and four (4) grandchildren, including a son-in-law;</p> <p>To prove how extreme weather events impact basic human rights;</p> <p>To support the oral testimony of Ms. Amalia Bahian during the December 2018 inquiry hearing; and</p> <p>To prove the existence, due execution, and other contents of the document</p>



<p><b>“DDDDDDDDDD” to “DDDDDDDDDD-3”</b></p> <p><b>“DDDDDDDDDD-3-A”</b></p>	<p>Statement of Resource Person, Kumi Naidoo dated 06 December 2018, consisting of 4 pages</p> <p>Signature of Kumi Naidoo</p>	<p>To show the link between climate change and human right issue that has been established by reports of several UN agencies and offices;</p> <p>To show that businesses are responsible to protect and respect human rights based on the United Nations Guiding Principles on Businesses and Human Rights (UNGPs);</p> <p>To provide information on the important role of the Commission on Human Rights of the Philippines to positively recognize the legal responsibility of the respondent carbon majors for human rights abuses resulting from climate change;</p> <p>To support the oral testimony of Mr. Kumi Naidoo during the December 2018 inquiry hearing; and</p> <p>To prove the existence, due execution, and other contents of the document</p>
<p><b>“EEEEEEEEEE”</b></p>	<p>Biography of Kumi Naidoo, consisting of 1 page</p>	<p>To establish the credibility and expertise of Kumi Naidoo on the topic he presented; and</p> <p>To prove the existence and contents of the document</p>
<p><b>“FFFFFFFFFF” to “FFFFFFFFFF-3”</b></p>	<p>Statement of Ms. Laura Gyte dated</p>	<p>To show an analysis of the elements of a just and</p>

<p><b>“FFFFFFFFF-3-A”</b></p>	<p>04 December 2018, consisting of 4 pages</p> <p>Signature of Ms. Laura Gyte</p>	<p>inclusive energy transition away from fossil fuels, which respondents should look into and adopt; and</p> <p>To prove the existence, due execution, and other contents of the document</p>
<p><b>“GGGGGGGGG”</b></p>	<p><i>Curriculum Vitae</i> of Ms. Laura Gyte, consisting of 1 page</p>	<p>To establish the credibility and expertise of Laura Gyte on the topic she presented; and</p> <p>To prove the existence and contents of the document</p>
<p><b>“HHHHHHHHH” to “HHHHHHHHH-3”</b></p>	<p>Printed PowerPoint Presentation of Ms. Laura Gyte, entitled “Statement of Resource Person Laura Gyte,” consisting of 4 pages</p>	<p>To show an analysis of the elements of a just and inclusive energy transition away from fossil fuels, which respondents should look into and adopt;</p> <p>To support the oral testimony of Ms. Laura Gyte during the December 2018 inquiry hearing; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“IIIIIIII” to “IIIIIIII-4”</b></p> <p><b>“IIIIIIII-4-A”</b></p>	<p><i>Salaysay ni Bb. Honeylyn A. Gonzales</i> dated 29 November 2018, consisting of 5 pages</p> <p>Signature of Bb. Honeylyn A. Gonzales</p>	<p>To prove how tropical storm Sendong (internationally known as “Washi”) impacted a female youth’s basic human rights to life, education, and shelter; specifically, showing how she coped with the loss of her parents and elder brothers and stood as a</p>

		<p>guardian-parent to her younger siblings;</p> <p>To support the oral testimony of Ms. Honeylyn Gonzales during the December 2018 inquiry hearing; and</p> <p>To prove the existence, due execution, and other contents of the document</p>
<p><b>“JJJJJJJJ” to “JJJJJJJJ-20”</b></p> <p><b>“JJJJJJJJ-20-A”</b></p>	<p>Statement of Dr. Glenn Paraso dated 06 December 2018, consisting of 21 pages</p> <p>Signature of Dr. Glenn Paraso</p>	<p>To prove the nexus between the impact of climate change to human health;</p> <p>To prove the assessment of prevailing local health systems and their exposure and sensitivities to climate variability that will help in the development of possible adaptation strategies and measure; and</p> <p>To prove the existence, due execution, and other contents of the document</p>
<p><b>“KKKKKKKKKK” to “KKKKKKKKKK-1”</b></p>	<p><i>Curriculum Vitae</i> of Dr. Glenn Paraso, consisting of 2 pages</p>	<p>To establish the credibility and expertise of Dr. Glenn Paraso on the matters he discussed; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“LLLLLLLLLL” to “LLLLLLLLLL-34”</b></p>	<p>Printed PowerPoint Presentation of Dr. Glenn Paraso, entitled “Climate Change and Health Nexus,” consisting of 35 pages</p>	<p>To prove the interrelated nexus between climate change and human health, such that health is a determinant and mediates climate change impact;</p>

		<p>To show different health impacts of climate change, specifically health pathways affected by changes in the climate;</p> <p>To show adaptation strategies for the health sector in the context of climate change;</p> <p>To support the testimony of Dr. Glenn Paraso during the December 2018 inquiry hearing; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“MMMMMMMMMM” to “MMMMMMMMMM-49”</b></p>	<p>Second National Communications: Health Sector Report by Glenn Roy V. Paraso, MD, MPH, September 2009, consisting of 50 pages</p>	<p>To prove the impacts of climate change to human health that has become an imperative issue to the Philippines being a developing country that has inadequate health resources;</p> <p>To show specific impacts of climate change to health in different cities and provinces in the Philippines;</p> <p>To prove that climate change is another stressor on top of the present public health challenge that will have to be responded sooner than later; and</p> <p>To prove the existence and other contents of the document</p>

<p>“NNNNNNNNNN” to “NNNNNNNNNN-1”</p> <p>“NNNNNNNNNN-1-A”</p>	<p>Statement of Ms. Loretta Ann Rosales, dated 11 December 2018, consisting of 2 pages</p> <p>Signature of Ms. Loretta Ann Rosales</p>	<p>To show how the UN Guiding Principles (UNGP) on Business and Human Rights (BHR) provide an analytical lens on what may constitute human rights protection in the Philippines from climate harms, including the role of businesses in addressing these harms and identification of any policy gaps that should be addressed by the Philippine Government;</p> <p>To show that human rights-based climate action should ensure the following: (a) access and participation of vulnerable groups; (b) it should be non-discriminatory; (c) there should be transparency and accountability; and (d) it should be sustainable and evidence-based; and</p> <p>To prove the existence, due execution, and other contents of the document</p>
<p>“OOOOOOOOOO” to “OOOOOOOOOO-1”</p>	<p><i>Curriculum Vitae</i> (Updated Profile of Loretta Ann Pargas-Rosales), consisting of 2 pages</p>	<p>To establish the credibility and expertise of Ms. Loretta Ann Rosales on the matters she discussed; and</p> <p>To prove the existence and contents of the document</p>
<p>“PPPPPPPPP” to “PPPPPPPPP”</p>	<p>Printed PowerPoint Presentation of Ms. Loretta Ann Rosales, entitled “Climate Change and Human</p>	<p>To show how civil society groups in collaboration with the Commission on Human Rights can work together to use a human rights lens in climate</p>

	<p>Rights” consisting of 8 pages</p>	<p>change protection for this generation and thereafter;</p> <p>To show how the UN Guiding Principles (UNGP) on Business and Human Rights (BHR) provide an analytical lens on what may constitute human rights protection in the Philippines from climate harms, including the role of businesses in addressing these harms and identification of any policy gaps that should be addressed by the Philippine Government;</p> <p>To show that human rights-based climate action should ensure the following: (a) access and participation of vulnerable groups; (b) it should be non-discriminatory; (c) there should be transparency and accountability; and (d) it should be sustainable and evidence-based; and</p> <p>To support the oral testimony of Ms. Loretta Ann Rosales during December 2018 inquiry hearing; and</p> <p>To prove the existence and contents of the document</p>
<p>“QQQQQQQQQ” to “QQQQQQQQQ-7”</p>	<p>Statement of Ms. Monica Piquero Tan dated 03 December 2018, consisting of 8 pages</p>	<p>To prove how extreme weather event, like the super typhoon Yolanda/Haiyan, impacted her life and livelihood as a</p>

<p><b>“QQQQQQQQQ-7-A”</b></p>	<p>Signature of Ms. Monica Piquero Tan</p>	<p>single parent with two (2) kids;</p> <p>To show her experience as an employee under a local Disaster Risk Reduction and Management wherein her community experienced zero casualty;</p> <p>To support the oral testimony of Ms. Monica Piquero Tan during December 2018 inquiry hearing; and</p> <p>To prove the existence, due execution, and other contents of the document</p>
<p><b>“RRRRRRRRR” to “RRRRRRRRR-21”</b></p> <p><b>“RRRRRRRRR-21-A”</b></p>	<p>Statement of Resource Person, Naderev “Yeb” Madla Saño dated 30 November 2018, consisting of 22 pages</p> <p>Signature of Mr. Naderev “Yeb” M. Saño</p>	<p>To show insights on climate policy, in particular the gaps in international and domestic policies;</p> <p>To show his personal experiences from bearing witness in communities and places adversely affected by climate change through his global climate pilgrimages;</p> <p>To share his reflections regarding the momentum building up in various sectors on climate accountability and climate justice issues;</p> <p>To share the reasons and motivation for the Petition and relate the journey of petitioners from the time of the lodging of this petition</p>

		<p>with the Commission on Human Rights;</p> <p>To support the oral testimony of Mr. Naderev “Yeb” M. Saño during December 2018 inquiry hearing; and</p> <p>To prove the existence, due execution, and other contents of the document</p>
<p>“SSSSSSSSSS” to “SSSSSSSSSS-11”</p>	<p><i>Curriculum Vitae</i> of Mr. Naderev “Yeb” M. Saño, consisting of 12 pages</p>	<p>To establish the credibility and expertise of Mr. Naderev “Yeb” Saño on the matters he discussed; and</p> <p>To prove the existence and contents of the document</p>
<p>“TTTTTTTTTTT’ to “TTTTTTTTTTT-9”</p> <p>“TTTTTTTTTTT-9-A”</p>	<p>Statement of Resource Person, Dr. Margaretha Wewerinke-Singh, dated 03 December 2018, consisting of 10 pages</p> <p>Signature of Ms. Margaretha Wewerinke-Singh</p>	<p>To prove the existence of the right to a remedy under international human rights law and, in the context of climate change, one way in which States can give effect to the right to a remedy is through a Climate Compensation Act;</p> <p>To show the existence and contents of a model that the Philippines can adopt (Climate Compensation Act) to ensure access to redress for human rights violations resulting from climate change that occur within the country; and</p> <p>To prove the existence, due execution, and other contents of the document</p>



<p><b>“UUUUUUUUU” to “UUUUUUUUU-2”</b></p>	<p><i>Curriculum Vitae</i> of Ms. Margaretha Wewerinke-Singh, consisting of 3 pages</p>	<p>To establish the credibility and expertise of Ms. Margaretha Wewerinke-Singh on the matters she discussed; and</p> <p>To prove the existence and contents of the document</p>
<p><b>“VVVVVVVVV” to “VVVVVVVVV-5”</b></p>	<p>Printed PowerPoint Presentation of Dr. Margaretha Wewerinke-Singh, entitled “A Climate Compensation Act,” consisting of 6 pages</p>	<p>To prove the existence of the right to a remedy under international human rights law and, in the context of climate change, one way in which States can give effect to the right to a remedy is through a Climate Compensation Act;</p> <p>To show the existence and contents of a model that the Philippines can adopt (Climate Compensation Act) to ensure access to redress for human rights violations resulting from climate change that occur within the country;</p> <p>To support the oral testimony of Dr. Margaretha Wewerinke-Singh during the December 2018 inquiry hearing; and</p> <p>To prove the existence, due execution, and other contents of the document</p>
<p><b>“WWWWWWWWW to WWWWWWWWW- 50”</b></p>	<p>Taking Climate Justice into Our Own Hands: A Model Climate</p>	<p>To prove the existence, contents, and legal basis for adopting a Model Climate Compensation Act</p>

	<p>Compensation Act by Andrew Gage and Margaretha Wewerinke dated December 2015, consisting of 51 pages</p>	
<p><b>“XXXXXXXXXX to XXXXXXXXXXXX-2”</b></p> <p><b>“XXXXXXXXXX-2-A”</b></p>	<p>Supplementary Statement of Laura Gyte dated 18 December 2018, consisting of 3 pages</p> <p>Signature of Laura Gyte</p>	<p>To supplement the testimony of Ms. Laura Gyte, specifically on the methodology for calculating costs of investment in fossil fuels, cost of renewable energy compared to fossil fuels, and the lack of knowledge of major fossil fuel company transitioning into renewable investments fully committed to the transition on a timescale compatible with limiting climate change to 1.5°C; and</p> <p>To prove the existence, due execution, and other contents of the document</p>
<p><b>“YYYYYYYYYYY to YYYYYYYYYY-14”</b></p>	<p>The AIIB’s Energy Opportunity: Background Research Report by Sivan Kartha, PhD dated June 2017, consisting of 15 pages</p>	<p>To show the existence and contents of a research conducted regarding the current and potential fossil fuel projects that the Asian Infrastructure Investment Bank (AIIB) funded and/or is looking into as prospects, providing for estimate emissions for each project and the cost of related climate change impacts;</p> <p>To show possible scenarios for future AIIB lending in</p>

		<p>order to examine their potential climate costs;</p> <p>To support the testimony of Ms. Laura Gyte during the inquiry hearing; and</p> <p>To prove the existence and other contents of the document</p>
<p><b>“ZZZZZZZZZZ” to “ZZZZZZZZZZ-5”</b></p>	<p>Rene Lefeber, 'Responsibility not to cause transboundary environmental harm', in L. Krämer &amp; E. Orlando (eds.), Principles of Environmental Law (2018), Elgar Encyclopedia of Environmental Law, vol. VI (Cheltenham: Edward Elgar), pp. 92 – 102, consisting of 6 pages</p>	<p>To prove the legal basis of the responsibility of a state not to cause transboundary (environmental) harm to other states and areas beyond the limits of national jurisdiction; and</p> <p>To prove other matters contained therein</p>

**All the foregoing exhibits, inclusive of sub-markings,** are in the custody of the Honorable Commission, and already form part of the records of the investigation.

Petitioners **adopt** as part of their evidence all other documents submitted before the Honorable Commission as they are relevant to their position against respondent Carbon Majors, such as, but not limited to:

- a) Documentary exhibits of the Honorable Commission’s resource persons in the New York and London inquiry hearings;
- b) Amicus briefs, letters, and position statements submitted in support of the petitioners and the investigation;

c) Databases and all documents mentioned in the Smoke and Fumes and Climate Files as testified to by Mr. Carroll Muffett and Mr. Kert Davies, respectively;

d) The expert presentations on the topic “*Corporate action on human rights and climate change: a deep dive into Shell’s actions and policies*” held at Nyenrode Business University in Breukelen, Netherlands on 17 January 2019.

## MANIFESTATION

Due to recent developments in climate litigations and some of the respondents’ lobbying tactics to forestall climate policies and to show a detailed overview of some of the respondents’ corporate statements in relation to climate change, petitioners, likewise, manifest and **adopt** the following documents as part of their documentary exhibits, which will be **alluded to and attached in the Memorandum that the petitioners will submit:**

a) **Complaint** before Superior Court of the State of California in the case entitled, “*Pacific Coast Federation of Fishermen’s Associations, Inc. v. Chevron Corp. et al.*,” docketed as CGC-18-571285, dated 14 November 2018, pp. 41-42<sup>1</sup>;

b) **Memorandum Opinion** in the case entitled, “*Mayor and City Council of Baltimore v. BP P.L.C., et al.*,” docketed as Civil Action No. ELH-18-2357 dated 10 June 2019<sup>2</sup>;

c) The most recent **InfluenceMap Report** that covers how much funding is being spent by some of the respondents on lobbying against Paris Agreement, entitled “*Big Oil’s Real Agenda on Climate Change dated March 2019*”<sup>3</sup>; and

d) **A detailed overview of the corporate statements on human rights and climate change** made by most of the respondents herein.

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<sup>1</sup> See: [http://blogs2.law.columbia.edu/climate-change-litigation/wp-content/uploads/sites/16/case-documents/2018/20181114\\_docket-CGC-18-571285\\_complaint.pdf](http://blogs2.law.columbia.edu/climate-change-litigation/wp-content/uploads/sites/16/case-documents/2018/20181114_docket-CGC-18-571285_complaint.pdf); last accessed on 18 July 2019

<sup>2</sup> See: [http://blogs2.law.columbia.edu/climate-change-litigation/wp-content/uploads/sites/16/case-documents/2019/20190610\\_docket-118-cv-02357\\_memorandum-opinion.pdf](http://blogs2.law.columbia.edu/climate-change-litigation/wp-content/uploads/sites/16/case-documents/2019/20190610_docket-118-cv-02357_memorandum-opinion.pdf); last accessed on 18 July 2019

<sup>3</sup> See: <https://influencemap.org/report/How-Big-Oil-Continues-to-Oppose-the-Paris-Agreement-38212275958aa21196dae3b76220bddc> dated 18 July 2019

## PRAYER

WHEREFORE, petitioners **GREENPEACE SOUTHEAST ASIA (PHILIPPINES), PHILIPPINE RURAL RECONSTRUCTION MOVEMENT, et al.** respectfully pray that the foregoing documentary exhibits, inclusive of their sub-markings, and all other documents submitted before the Honorable Commission as they are relevant to Petitioners' position against respondent Carbon Majors, such as, but not limited to: (a) documentary exhibits of the Honorable Commission's resource persons in the New York and London inquiry hearings; (b) amicus briefs, letters, and position statements submitted in support of the Petitioners and the investigation; and (c) the expert presentations on the topic "*Corporate action on human rights and climate change: a deep dive into Shell's actions and policies*" held at Nyenrode Business University in Breukelen, Netherlands be **ADMITTED IN EVIDENCE** for the purposes for which they are respectively offered.

Petitioners further pray that the **additional documents to be alluded to and attached in their Memorandum**, which are, but not limited to: (a) Complaint before Superior Court of the State of California in the case entitled, "*Pacific Coast Federation of Fishermen's Associations, Inc. v. Chevron Corp. et al.*," docketed as CGC-18-571285, dated 14 November 2018, pp. 41-42<sup>4</sup>; (b) Memorandum Opinion in the case entitled, "*Mayor and City Council of Baltimore v. BP P.L.C., et al.*," docketed as Civil Action No. ELH-18-2357 dated 10 June 2019<sup>5</sup>; (c) the most recent InfluenceMap Report that covers how much funding is being spent by some of the respondents on lobbying against Paris Agreement, entitled "*Big Oil's Real Agenda on Climate Change dated March 2019*"<sup>6</sup>; and (d) a detailed overview of the corporate statements on human rights and climate change made by most of the respondents herein be **ADMITTED IN EVIDENCE** in their favor.

Petitioners pray for such other reliefs as may be deemed just and equitable under the premises.

RESPECTFULLY SUBMITTED.

Quezon City, Philippines, 19 July 2019.

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<sup>4</sup> See: [http://blogs2.law.columbia.edu/climate-change-litigation/wp-content/uploads/sites/16/case-documents/2018/20181114\\_docket-CGC-18-571285\\_complaint.pdf](http://blogs2.law.columbia.edu/climate-change-litigation/wp-content/uploads/sites/16/case-documents/2018/20181114_docket-CGC-18-571285_complaint.pdf); last accessed on 18 July 2019

<sup>5</sup> See: [http://blogs2.law.columbia.edu/climate-change-litigation/wp-content/uploads/sites/16/case-documents/2019/20190610\\_docket-118-cv-02357\\_memorandum-opinion.pdf](http://blogs2.law.columbia.edu/climate-change-litigation/wp-content/uploads/sites/16/case-documents/2019/20190610_docket-118-cv-02357_memorandum-opinion.pdf); last accessed on 18 July 2019

<sup>6</sup> See: <https://influencemap.org/report/How-Big-Oil-Continues-to-Oppose-the-Paris-Agreement-38212275958aa21196dae3b76220bddc> dated 18 July 2019

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