VEREIN KLIMASENIORINNEN AND OTHERS v SWITZERLAND (53600/20)

COMMUNICATION

In accordance with Rule 9.2. of the Rules of the Committee of Ministers regarding the supervision of the execution of judgments and of terms of friendly settlements by

Greenpeace International, Climate Litigation Network and A Sud (Italia), Ärztinnen und Ärzte für Umweltschutz, Schweiz, Association for Farmers Rights Defense, AFRD Georgia, Association Justice and Environment, Association Noé21, Brava (ehemals Terre des Femmes), Campax, Center for International Environmental Law (CIEL), Center for Spatial Justice, ClientEarth, Conference of INGOs of the Council of Europe, Diritto Diretto, Environmental Justice Network Ireland (EJNI), European Environmental Bureau, FIAN Suisse/Schweiz pour le droit à l'alimentation, Global Legal Action Network (GLAN), Hawai'i Institute for Human Rights, humanrights.ch, International Commission of Jurists (ICJ), International Federation for Human Rights (FIDH), International Service for Human Rights, JUSCLIMA Climate Collective, Klima-Allianz Schweiz / Alliance Climatique Suisse, Les Grands-parents pour le climat (GPC), négaWatt Schweiz, NGO-Plattform Menschenrechte Schweiz, Operation Libero, Notre Affaire à Tous, Schweizerische, Energie-Stiftung / Fondation de l'énergie suisse (SES), World's Youth for Climate Justice (WYCJ), Youth and Environment Europe & YUVA

VEREIN KLIMASENIORINNEN SCHWEIZ AND OTHERS v SWITZERLAND (53600/20)

COMMUNICATION In accordance with Rule 9.2. of the Rules of the Committee of Ministers regarding the supervision of the execution of judgments and of terms of friendly settlements by Greenpeace International, Climate Litigation Network and 32 organisations

1. Introduction

1. Pursuant to Rule 9.2 of the Rules of the Committee of Ministers for the supervision of the execution of judgments and Article 46 § 1 of the Convention, we, the undersigned, Climate Litigation Network and Greenpeace International, supported by 32 civil society organisations (Annex I), submit this joint Communication on the execution of the judgment *Verein KlimaSeniorinnen Schweiz and others v Switzerland* (*KlimaSeniorinnen*).

2. In its 9 April 2024 judgment, the Grand Chamber ruled that there were critical lacunae in Switzerland's process of putting in place the relevant domestic regulatory framework to fulfil its positive obligations under the Convention in the context of climate change in violation of Article 8 of the European Convention on Human Rights (ECHR), including: a failure to quantify, through a carbon budget or otherwise, national greenhouse gas emissions (GHG) limitations (§§ 570; 573); as well as a failure to meet past GHG emissions reductions targets. The Court concluded that Switzerland failed to act in good time and in an appropriate and consistent manner regarding the devising, developing and implementation of the relevant legislative and administrative framework to fulfil its positive obligations under the Convention. The Court also found a violation of the right to access to court protected by Article 6 §1 of the ECHR.

3. The Grand Chamber found that Article 8 of the ECHR guarantees the right to effective protection from the harmful effects of climate change (§§519, 544). Positive obligations flowing from this right include the adoption and effective application of regulations and measures capable of mitigating the existing and potentially irreversible future effects of climate change (§545), especially considering the "urgency of near-term integrated climate action", the "rapidly closing window of opportunity to secure a liveable and sustainable future for all" (§§ 118, 542) and that "to avoid a disproportionate burden on future generations, immediate action needs to be taken" (§549). The Court established that States must

quantify national GHG emissions limitations, through a carbon budget or equivalent method of quantification, "on the basis of equity and in accordance with their own respective capabilities" (§571).

4. Measures can only be capable of protecting human rights against the worsening impacts of climate change if they are based on a scientifically grounded quantification of a fair share of the necessary global efforts for holding temperature rise to 1.5˚C. The "regulatory obligation" (§572) formulated in §550(a) of *KlimaSeniorinnen* requires Switzerland to quantify national GHG emissions limitations through a national carbon budget, or an equivalent method of quantification, that is set: (1) in relation to the remaining global carbon budget for 1.5˚C; and (2) based on a quantification of a national fair share of the remaining global budget. This fair share 1.5˚C aligned carbon budget must be in line with the principle of common but differentiated responsibilities and respective capabilities (CBDR-RC) (§§442, 545, 571) and grounded in equity (§571). For more information, we respectfully refer you to the NGOs' March 2025 Rule 9.2 Submission, paras 14-26 ("March 2025 Rule 9.2 Submission"). The NGOs further refer to the findings by three National Human Rights Institutions - of Norway, the Netherlands, and Switzerland - all coming to the conclusion that *KlimaSeniorinnen* requires States to quantify a fair share and 1.5 ˚C-aligned carbon budget.

5. Furthermore, as the Court stated, it is not enough for Switzerland to claim that the principle of CBDR-RC, or other fairness principles, were considered in determining its NDC (§§569-572). Switzerland must actually quantify its budget by reference to fairness principles. Finally, the Grand Chamber determined that "under its current climate strategy, Switzerland allowed for more GHG emissions than even an 'equal per capita emissions' quantification approach would entitle it to use" (§569), thereby failing even in fulfilling the most lenient approach to calculating fair share. As such, the NGOs respectfully submit that Switzerland must quantify its national carbon budget using a more stringent fair share methodology (March 2025 Rule 9.2 Submission, paras 24-26).

6. On 6 March 2025, the Committee of Ministers of the Council of Europe requested further information from Switzerland, including a demonstration that "the methodology used to devise, develop and implement the relevant legislative and administrative framework responds to the Convention requirements as detailed by the Court and relies on a quantification, through a carbon budget or otherwise, of national greenhouse gas emissions limitations" in its CM/Del/Dec(2025)1521/H46-30 ("March 2025 Decision").

7. This submission shows that the information provided by Switzerland on 23 June 2025 ("Rule 8.2 Submission") falls short of implementing the *KlimaSeniorinnen* judgment. While the NGOs consider that Switzerland falls short in executing the judgment with respect to both Article 8 (mitigation, adaptation, and procedural guarantees) and Article 6 (access to court), this submission primarily focuses on Switzerland's failure to quantify a carbon budget. The NGOs consider this obligation to be central to the Court's findings, and it is moreover where their expertise can be of most assistance to the Committee of Ministers. The NGOs reiterate and maintain the arguments presented in their March 2025 Rule 9.2 Submission. For reasons of brevity, those arguments are not repeated in full in the present submission.

2. Switzerland's "methodology" falls short of the Court's findings

2.1. Switzerland continues to fail to provide a quantification of a carbon budget as required by the ECtHR and requested by the CMDH

8. As the NGOs show in this submission, notwithstanding its claim in the June 2025 Rule 8.2 Submission or in its September 2024 Action Report, Switzerland has not remedied the ongoing violation of Article 8 of the Convention. Indeed, despite the additional regulations since January 2025, the Swiss Authorities have still failed to

demonstrate how these measures relate to a national carbon budget. Moreover, they have entirely disregarded the budget calculation contained in the Expert Report in the March 2025 Rule 9.2 Submission (Annex II), and continue to exceed the budget quantified in that expert report (see further below). Switzerland has taken this position despite the Committee of Ministers' explicit invitation to address these issues (March 2025 Decision para 5), that were further clarified in the Secretariat's March 2025 Notes: "is the roadmap for reducing greenhouse gas emissions firmly rooted in a quantification of national greenhouse gas emissions limitations; and what is the process to update the targets with due diligence, and to monitor compliance with the targets?"

Switzerland must quantify a fair share national carbon budget

9. In its judgment, the Court clearly identified as crucial that States quantify "national GHG emissions limitations" (§570; §573), through a "carbon budget, or an equivalent method of quantification" (§550(a)). Switzerland's failure to do so constituted one of the "critical lacunae" in its regulatory framework (§573).

10. This finding, as well as the questions asked by the Grand Chamber to the parties in advance of the hearing, shows the Court's understanding that if States are to take measures capable of mitigating the adverse effects of climate change (§545), they must restrict their cumulative emissions in a way that aligns them with the global effort required to remain within 1.5°C of warming. This led the Court to the conclusion that States must quantify their national GHG emissions limitations and plan their timeline to net zero in a way that respects those limitations (§550(a)).

11. The Court's order and the CMDH request to quantify national GHG emissions limitations are grounded in legal and scientific necessity, not made at random. As expressed in the NGO's March 2025 Rule 9.2 Submission, **measures can only be capable of protecting human rights against the worsening impacts of climate change if they are based on a scientifically grounded quantification of a fair share of the necessary global efforts to limit temperature rise to 1.5˚C** (March 2025 Rule 9.2 Submission, para 20)**.**

12. As the NGOs set out in detail in their March 2025 Rule 9.2 Submission, the requirement to quantify a national fair share of the remaining global carbon budget for 1.5˚C flows from the Court's findings (1) that national carbon budgets should align with the principle of CBDR-RC (§§442, 545, 571); (2) that fairness principles need to be *quantified* rather than merely alluded to (§§570-571); and (3) that Switzerland had violated the Convention because its targets were insufficient even against the equal per capita fairness principle (§§569).

13. The Court expressly rejected the argument that Switzerland's "national climate policy could be considered as being close to an approach of establishing a carbon budget" (§§ 360, 571). It is thus an established legal requirement that climate policies must stem directly from an initial quantification of the fair share of the global carbon budget. At the implementation phase, this point is not open for re-argument.

Switzerland continues to fail to quantify a fair share carbon budget

14. Despite the clear pronouncements from the Court on the necessity to devise, develop and implement a relevant domestic regulatory framework through first quantifying, through a carbon budget or otherwise, national GHG emissions, the Swiss authorities have refused once again to quantify a national fair share of the remaining global budget, repeating once again arguments that have been rejected by the Court (§§ 360, 571), such as the notion of an "implicit carbon budget", i.e. emissions projected to result from an unchanged climate strategy. This approach fails to satisfy a fundamental requirement of the Court: a quantification of national GHG emissions limitations based on the remaining global carbon budget.

15. The "implicit carbon budget" of 620 Mt CO_2 eq (2021-2050) simply represents the emissions that the Swiss authorities intend to emit based on their (now more precisely defined) climate strategy, and **not their permissible limit within the remaining global CO_2 budget.** Just as it did in its Action Report, **Switzerland has simply taken its unchanged climate targets and mapped the amount of cumulative emissions expected to result from those, irrespective of the remaining global carbon budget for 1.5 °C and its own fair share thereof (March 2025 Rule 9.2 Submission, para. 33).**

16. Once again, and irrespective of whether Switzerland calls this a "similar approach to establishing a CO2 budget" (September 2024 Action Report) or an "implicit carbon budget" (June 2025 Rule 8.2 Submission), this approach was rejected by the Court (KlimaSeniorinnen §570), and by the Committee of Ministers in its March 2025 Decision. As stated in the March 2025 Notes:

> "At the same time, it is recalled that a large part of the Court's reasoning in finding an insufficient compliance with the obligation related to lacunae in the process followed to devise, develop and implement the relevant domestic regulatory framework. In particular, the Court was not convinced that an effective regulatory framework concerning climate change could be put in place without quantifying (upstream), through a carbon budget or otherwise, national greenhouse gas emissions limitations. It explicitly rejected the argument that submissions of Switzerland's NDCs could compensate for the lack of a carbon budget (or another quantification method). The Court also relied on the fact that the State had previously failed to meet its past greenhouse gas emission reduction targets."

17. Accordingly, by once again refusing to engage in a fair share quantification exercise, the authorities have shown an unwillingness to create a "roadmap for reducing greenhouse gas emissions (that is) firmly rooted in a quantification of national greenhouse gas emissions limitations" (March 2025 Notes).

18. Moreover, the cumulative emissions that will occur under Switzerland's existing climate policies and targets – what Switzerland calls "implicit carbon budgets" – significantly exceed even the most lenient approach to quantifying its fair share carbon budget based on a simple per capita allocation. Switzerland asserted in its 2024 Action Report and the supplemental information that the 0.66 Gt CO_2eq it intends to use (2020-2050) equals 0.33% of the remaining global carbon budget (50% probability for 1.5°C). Given that Switzerland only represents 0.11% of the global population (Our World in Data), **it is clear that Switzerland**, by its own admission, **intends to use three times the carbon budget that even an equal per capita distribution as of 2020 would allow.**

19. Switzerland, moreover, expressly acknowledges that its climate strategy is not based on a fair share determination (Rule 8.2 Submission, p. 8).

20. As the NGOs showed in their March 2025 submission, an equal per capita calculation of Switzerland's carbon budget as of 2015 (the year the Paris Agreement was signed) would be used up before the end of 2032 if Switzerland maintains and achieves its targets (detailed scientific calculation in March 2025 Rule 9.2 Submission, Annex III). The other methodologies of calculating a fair share carbon budget, as derived and proposed by the European Scientific Advisory Board on Climate Change (ESABCC), including economic capability and/or historical emissions, all result in significantly lower carbon budgets for Switzerland than the most lenient approach, with a simple equal per capita allocation.

21. As a result, the revised *Loi fédérale sur les objectifs en matière de protection du climat, sur l'innovation et sur le renforcement de la sécurité énergétique* ("LCI") and the *Loi sur le CO2* ("CO_2 Act"), along with the updated NDC, do not remedy the

critical lacuna that amounted to a violation of Article 8 of the Convention (§573). These revised and updated policies once again do not flow from a quantified fair share national carbon budget, which is the first step the Court established as necessary to ensure that measures capable of protecting human rights against the worsening impacts of climate change are put in place (§550(a) see also March 2025 Rule 9.2 Submission, para 25).

22. The NGOs therefore submit that (1) Switzerland has failed to quantify a carbon budget at all; (2) that the "implicit carbon budget" it presents is not based on the remaining global carbon budget, and therefore divorced from holding global temperature increase to 1.5°C; and (3) that the cumulative emissions projected to result from Switzerland's climate policies, as presented by it, would exceed its national carbon budget when quantified in accordance with the Court's judgment.

2.2. <u>To demonstrate compliance, Switzerland must demonstrate the scientific basis for its policies</u>

23. As set out above, Switzerland continues to fail to meet the standards set out in the Court's judgment. This section aims to formulate a number of questions of science that, in the view of the NGOs, Switzerland should be urged to answer, in order for it to demonstrate implementation of the judgment. These questions equally inform how Switzerland *can* ensure that it formulates reduction targets that are in keeping with its national carbon budget, as required by the Court.

24. Each of the questions set out below is based on the Court's findings in relation to Article 8 of the Convention, and Switzerland's violation of that provision.

Scientific questions to be answered by Switzerland

25. Based on the above, the NGOs conclude that the Additional Information provided by Switzerland fails to engage with climate science in a manner that effectively protects human rights, in accordance with the Court's judgment. **The NGOs recommend that the Committee of Ministers ask a number of questions in relation to climate science**. These questions should guide a Convention-compliant response by Switzerland and will allow the Committee of Ministers to properly assess Switzerland's implementation of the judgment.

26. The questions are as follows:

i. Has a national carbon budget been set in relation to the global carbon budget for 1.5 °C?

ii. What effort-sharing approach was used to calculate Switzerland's national carbon budget in relation to the global carbon budget for 1.5 °C? Please provide information as to each of the steps taken in applying the relevant effort-sharing methodology.

iii. How have the principles of equity and CBDR-RC been reflected in the quantitative assessment of Switzerland's national carbon budget?

   a. How have those principles been interpreted, and based on what source(s)?

   b. What principles of justice inform Switzerland's interpretation of CBDR-RC and equity?

   c. How do these relate to global temperature limits, corresponding budgets, allocation approaches, and indicators?

iv. Have Switzerland's intermediate and overall net-zero GHG targets been set taking into account the national carbon budget?

v. If Switzerland uses "another method of quantification of future GHG emissions", how is this method rooted in science and *capable* of effectively protecting human rights?

2.3. Switzerland's internal constitutional structure cannot displace its obligation to quantify a *national* carbon budget

27. The Court was clear on the importance of quantifying *national* GHG emissions limitations through a national carbon budget or an equivalent method of quantification (§570). This must be a State-wide budget for it to be an effective limitation of emissions, in line with human rights requirements.

28. Under international law, human rights obligations under the Convention rest on Switzerland as a State, as a subject of international law. Whereas its internal constitutional structure is of course of relevance for how it implements its obligations, they cannot be relied upon to justify a failure to perform treaty obligations (Art. 27 Vienna Convention on the Law of Treaties).

29. To this end, the Grand Chamber held the following in *Humpert and Others v Germany*:

> 71. As the Court has repeatedly stated (see, among other authorities, *Grzęda v. Poland* [GC], no. 43572/18, § 340, 15 March 2022), Contracting Parties should abide by the rule-of-law standards and respect their obligations under international law, including those voluntarily undertaken when they ratified the Convention. The principle that States must abide by their international obligations has long been entrenched in international law; in particular, "a State cannot adduce as against another State its own Constitution with a view to evading obligations incumbent upon it under international law or treaties in force" (see the Advisory Opinion of the Permanent Court of International Justice on *Treatment of Polish Nationals and Other Persons of Polish Origin or Speech in the Danzig Territory*, quoted in paragraph 52 above). The Court further observes that, under the Vienna Convention on the Law of Treaties, a State cannot invoke its domestic law, including the Constitution, as justification for its failure to respect its international-law commitments (see Article 27 of the Vienna Convention on the Law of Treaties, quoted in paragraph 51 above).

3. Switzerland did not adequately respond to the CM's other questions

30. **Response to the information regarding implementation of legislative commitments**: In response to the Committee of Ministers' invitation to the authorities to "provide further information on the implementation measures on the federal and cantonal level" (March 2025 Decision), despite the deficiencies identified by the Court (§§ 550(e), 556, 565, 567), Switzerland continues to fall short of its obligation to act in good time and in an appropriate and consistent manner in devising and implementing relevant legislation and measures. The Climate Act sets long-term targets for 2040 and 2050 but still lacks concrete implementation measures (§565), relying instead on the insufficient 2011 CO_2 Act. The measures presented to achieve the 2030 target are highly unlikely to be sufficient, given the regulatory gaps in high-emission sectors such as agriculture and finance, the absence of strengthened levies, and the lack of a clear plan to achieve even modest reductions in transport-related emissions. Importantly, the authorities do not provide independent scientific analysis confirming that the combined effect of the measures will effectively achieve the 50% reduction; therefore, there is no proof that the climate target for 2030 will be met. Cantonal efforts, while relevant, are

subordinate to federal responsibility and do not offset the inadequacy of national measures (see para 28 above). Moreover, although the majority of emissions attributable to Switzerland occur abroad, consumption-based emissions remain excluded from the national framework, contrary to the Court's judgment (§§ 279-281).

31. **Regular revision and update of climate targets:** Switzerland has been invited in the 2025 Notes to explain the process to update the targets with due diligence. The NGOs note that, under Article 40(1) of the CO_2 Act, the Federal Council is required to periodically evaluate the effectiveness of existing measures and assess the need for additional action. However, even if such a need is identified, there is no legal obligation for the Federal Council to submit proposals for new reduction targets or measures to the Federal Assembly. This lack of binding follow-up obligations, coupled with the absence of an independent national oversight mechanism (see below), creates structural weaknesses. Due diligence requires not only assessment and reporting, but also structured procedures for revising targets and strengthening measures where necessary.

32. **Monitoring and assessing the mitigating measures implemented by the authorities:** Switzerland has been invited in the 2025 Notes to indicate whether there is a body or mechanism at the national level (such as an independent expert body or committee) with the capacity and authority to monitor and assess the mitigating measures implemented by the authorities. The NGOs note that the Advisory Body on Climate Change (OcCC) was the only body with such a mandate and expertise; nevertheless, it was dissolved in 2021. The dissolution of the OcCC has left a gap in independent, expert-driven climate policy advice at the national level. This highlights all the more the need for an institutional framework to ensure informed, science-based climate policymaking in Switzerland.

33. **Response to the information regarding adaptation measures:** The NGOs also recommend that the Committee of Ministers urge Switzerland to answer in more detail the specific request on adaptation, i.e. the "concrete measures being taken to alleviate the most severe or imminent consequences of climate change in Switzerland, including any particular needs for protection, especially for persons in a vulnerable situation" (March 2025 Decision). While the NGOs acknowledge the progress made in terms of the new incentive program for adaptation to climate change, Adapt+, the information submitted by the authorities does not detail specific measures on how the most severe or imminent consequences and the particular needs of people in vulnerable situations will be taken into account, particularly also not in the long term. The NGOs question how particularly vulnerable individuals, such as elderly women, will be effectively protected in the year 2040 and beyond, beyond currently recommended short-term behavioural adjustments (e.g., heat warnings including the recommendation to drink enough water, darkening rooms), which will not be sufficient in the medium to long term. Additionally, a comprehensive overview of such cantonal efforts and their coordination with federal measures would be beneficial.

34. Regarding the **procedural safeguards**, we recommend that the Committee of Ministers request more information on the "concrete examples showing their effectiveness in practice in the field of climate change" (March 2025 Decision), as the NGOs note that the information submitted by the authorities does not demonstrate the effectiveness of the public consultation, nor does it indicate how the public was consulted and informed in the decision on Switzerland's climate targets, not to mention the decision not to develop a quantified fair share national carbon budget for Switzerland or an equivalent method of quantification.

35. **Access to justice**: On the Committee of Ministers' invitation to the authorities to update the Committee on the evolution of domestic case-law, regarding both the standing of associations to bring climate change-related cases and on courts' assessments of the merits of such cases" (March 2025 decision), we note that the authorities have not reported on the denial of standing in the case of *Uniterre et al*

v. Swiss Department for the Environment. In this climate case initiated in March 2024, nine Swiss farmers and five farming interest associations petitioned the Swiss Department of Environment, Transport, Energy, and Communication (DETEC), seeking increased government action to mitigate the escalating droughts that threaten their livelihoods. Operating under the Swiss Federal Administrative Procedure Act, which requires the government to desist from unlawful acts impacting "petitioners' human and constitutional rights," the petitioners claimed the government should be ordered to take every measure to reduce climate change and drought impacts on Swiss territory, asserting violations of their rights to life, private life, property, and economic liberty under the Swiss Constitution, the Convention and domestic legislation in light of the Paris Agreement. However, in a decision issued on September 14, 2024 (though handed down earlier on March 5, 2024), DETEC rejected the petitioners' claims on standing grounds. As detailed on page 14 of the decision, DETEC asserted that the petitioners had not suffered a harm more intense than that experienced by other segments of the population, without referencing the *KlimaSeniorinnen* decision on standing. DETEC's denial also cited the Federal Council's August 28, 2024 decision, the political statement rejecting the extension of the right of association to bring climate-related claims, despite such a right being recognised by the Court: "Au demeurant, le DETEC note que, dans sa décision du 28 août 2024, le Conseil fédéral rejette l'extension du droit de recours des associations aux questions climatiques opérée par la Cour Européenne des Droits de l'Homme dans son arrêt du 9 avril 2024 dans l'affaire « VEREIN KLIMASENIORINNEN SCHWEIZ ET AUTRES c. SUISSE »" (p.14). The *Uniterre et al.* case is now awaiting a decision from the Federal Administrative Court. Importantly, in that case, the authorities, in their additional information, have not claimed to have granted access to justice based on the *KlimaSeniorinnen* judgment or to have even considered the parameters set out in the Court's judgment.

4. Recommendations

36. Bearing in mind the arguments set out above, the NGOs respectfully recommend that the Committee of Ministers:

a. *Reject* Switzerland's request to conclude supervision;
b. *Express concern* that Switzerland fails to engage with the core of the Court's findings, and fails to set out the measures necessary to implement the judgment;
c. *Note with regret* that Switzerland has failed to "demonstrate that the methodology used to devise, develop and implement the relevant legislative and administrative framework responds to the Convention requirements as detailed by the Court and relies on a quantification, through a carbon budget or otherwise, of national greenhouse gas emissions limitations", as decided by the CMDH;
d. *Reaffirm* the necessity of ensuring, first, a quantified national carbon budget, upon which Switzerland's climate regulatory framework is revised so that its reduction targets comply with its quantified national carbon budget, determined in compliance with Article 8 of the Convention as applied by the Court;
e. *Urge* Switzerland to provide thorough and detailed answers to the scientific questions set out above in section 2.2;
f. *Urge* Switzerland to develop adequate implementation measures for the pathway to net-zero and beyond, and to submit scientific evidence demonstrating that the climate targets can realistically be achieved with the proposed measures;
g. *Urge* Switzerland to strengthen the process to update climate targets and measures with due diligence;

h. *Urge* Switzerland to implement a body or mechanism at national level (such as an independent expert body or committee) with the capacity and authority to guide, monitor and assess the mitigating measures implemented by the authorities;

i. *Request* detailed information on the concrete adaptation measures currently being taken to alleviate the most severe or imminent consequences of climate change in Switzerland, including a comprehensive overview of cantonal measures, with particular attention to persons in vulnerable situations; *request* the submission of a comprehensive long-term adaptation strategy, covering both federal and cantonal levels, that outlines how vulnerable populations will be protected and supported in the face of increasing climate-related risks beyond the short term; *request* scientific evidence demonstrating the effectiveness of both existing and planned adaptation measures, particularly in relation to the protection of persons in vulnerable situations over the medium and long term;

j. *Request* that the authorities provide concrete examples demonstrating the effectiveness of procedural safeguards in practice in the field of climate change;

k. *Request* that the authorities provide concrete examples demonstrating that they are protecting the rights of associations' access to courts in climate-change litigation in line with the Court's judgment, specifically requiring more information on the case of *Uniterre et al*, and

l. *Decide* to resume examination of the case in March 2026 at the latest, and at least twice a year going forward.

ANNEX I List of signatory organisations

1. A Sud (Italia)
2. Ärztinnen und Ärzte für Umweltschutz, Schweiz
3. Association for Farmers Rights Defense, AFRD Georgia
4. Association Justice and Environment
5. Association Noé21
6. Brava (formerly Terre des Femmes)
7. Campax
8. Center for International Environmental Law (CIEL)
9. Center for Spatial Justice
10. ClientEarth
11. Conference of INGOs of the Council of Europe
12. Diritto Diretto
13. Environmental Justice Network Ireland (EJNI)
14. European Environmental Bureau
15. FIAN Suisse/Schweiz pour le droit à l'alimentation
16. Global Legal Action Network (GLAN)
17. Hawai'i Institute for Human Rights
18. humanrights.ch
19. International Commission of Jurists (ICJ)
20. International Federation for Human Rights (FIDH)
21. International Service for Human Rights (ISHR)
22. JUSCLIMA Climate Collective
23. Klima-Allianz Schweiz / Alliance Climatique Suisse
24. Les Grands-parents pour le climat (GPC)
25. négaWatt Schweiz
26. NGO-Plattform Menschenrechte Schweiz
27. Notre Affaire à Tous
28. Operation Libero
29. Schweizerische Energie-Stiftung / Fondation de l'énergie suisse (SES)
30. World's Youth for Climate Justice (WYCJ)
31. Youth and Environment Europe
32. YUVA


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