

TABLE OF CONTENTS

(Memorandum of the Petitioners dated 18 September 2019)

I.	Prefatory Statement	2
II.	The Case	7
III.	The Proceedings	9
IV.	The Honorable Commission’s Authority to Investigate and Grant the Reliefs prayed for by the Petitioners	20
V.	Material Facts as Established by Evidence	25
	A. Basic climate science and understanding climate change in a global context	25
	B. IPCC reports as material facts	27
	C. Impacts felt and projected can be attributable to specific human activities	38
	D. Respondent Carbon Majors’ knowledge of climate risks and actions and/or inactions in light of foreseeable climate harms	41
VI.	Brief Statement of Petitioners’ Position	67
	A. Climate science	67
	B. The human rights harms being suffered by the petitioners and the Filipinos	68
	C. Respondent Carbon Majors’ knowledge of foreseeable climate risks and harms to people	68
	D. Respondent Carbon Majors’ responsibility to respect and protect human rights under international law and agreements	70
	E. Respondents’ moral and legal responsibility under general principles of tort and human rights law	71
VII.	Issues	72
	A. Whether climate change is impacting the Philippines	
	B. Whether climate change results in – and/or threatens -- the impairment, infringement, abuse, and/or violation of the human rights of Filipinos	
	C. Whether respondent Carbon Majors significantly contribute to climate change	
	D. Whether respondent Carbon Majors’ actions and/or inactions are linked to the climate change impacts occurring and/or threatening to occur in the Philippines	
	E. Whether respondent Carbon Majors are responsible, under international laws and agreements and domestic laws to respect and protect the human rights of Filipinos in the context of climate	

change

VIII. Arguments and Discussion	73
A. Climate change is impacting the Philippines and Filipinos suffer disproportionately from these impacts	73
B. Climate change results in – and/or threatens -- the impairment, infringement, abuse, and/or violation of the human rights of the Filipinos	86
C. Respondent Carbon Majors significantly contribute to climate change	113
D. Respondent Carbon Majors’ actions and/or inactions are linked to the climate change impacts occurring and/or threatening to occur in the Philippines	118
E. Respondent Carbon Majors are responsible, under international laws and agreements and domestic laws to respect and protect the human rights of Filipinos in the context of climate change	124
IX. Recommendations and Ways Forward	143
X. Epilogue	166
XI. Prayer	168