

Claimant
I [REDACTED] Johnson
First

4th December 2017

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION
ADMINISTRATIVE COURT

Claim No: CO/

BETWEEN:

THE QUEEN

on the application of

- (1) PLAN B. EARTH
- (2) CARMEN THERESE CALLIL
- (3) JEFFREY BERNARD NEWMAN
- (4) JO-ANNE PATRICIA VELTMAN
- (5) LILY [REDACTED] JOHNSON
- (6) MAYA YASMIN CAMPBELL
- (7) MAYA DOOLUB
- (8) PARIS ORA PALMANO
- (9) ROSE NAKANDI
- (10) SEBASTIEN JAMES KAYE
- (11) WILLIAM RICHARD HARE
- (12) MHB (A CHILD) BY HIS LITIGATION FRIEND DHB

Claimants

- and -

SECRETARY OF STATE FOR BUSINESS, ENERGY AND INDUSTRIAL STRATEGY

Defendant

- and -

THE COMMITTEE ON CLIMATE CHANGE

Interested Party

FIRST WITNESS STATEMENT OF LILY [REDACTED] JOHNSON

I, LILY [REDACTED] JOHNSON, of [REDACTED] SHALL SAY AS FOLLOWS:-

1. I am an artist living in London. I make this statement in support the claim for judicial review brought by Plan B. Earth ("Plan B"), me and others against the defendant Secretary of State for Business, Energy and Industrial Strategy for failing to revise the UK's carbon target pursuant to his powers under the Climate Change Act 2008.
2. Except where otherwise stated, the facts and matters set out in this witness statement are within my own personal knowledge. Where they are not, I identify the source of my understanding and belief. It will also be clear from the context where certain statements are matters of opinion, and I have endeavoured to explain the bases of those opinions.

My background and my reasons for supporting the challenge

3. I am an artist living in London. I have not, in the past, been involved with any actions or campaigning relating to climate change. I have, however, through my work and my research as an artist, and through questioning my own habits, become increasingly aware of the environmental degradation being caused by human activity.
4. I have also become increasingly aware of the urgency of the need for both national and global action to reduce emissions, not just drastically, but sufficiently, to avert disaster.
5. I am 31 years old and I do not know whether I will have a child or not. I would like to become a parent one day, but like many of my peers I have serious doubts as to whether it is right or fair to have a child given the potential impact of climate change.
6. At present, we are headed towards runaway climate change. I am not worrying about whether my future child will go to university, find a job or own their own home - I am worried about whether they will have basic food and shelter. I am worried about how they will keep warm and defend themselves. I am worried about whether they will have the chance to grow old, and to live for anything beyond basic survival.
7. What I do feel certain of, is that if we do not do whatever it takes, right now, in this present moment, it will be very clear to the next generation that we have betrayed them.
8. Fundamental changes to our patterns of consumption, cooperation and technological innovation will all be essential for reducing emissions. However, this innovation may not take place in time if adequate emissions targets remain merely an option rather than

a requirement. It is both reckless and unacceptable that the UK government continues to leave our future to chance in this way. The resolution to sufficiently reduce emissions must come first and innovation must follow. Not the other way around.

9. This is why, in my opinion, the UK government must set, and stick to, a target that is consistent with science and international law.

Costs

10. I understand that the costs recoverable from me in the event that this claim is unsuccessful, are limited by the Aarhus rules, which the Defendant accepts apply to this case.
11. Aside from the concerns that I identify above, my decision to bring this claim as a co-claimant is based on: (a) my understanding that my notional costs liability in the proceedings would be no greater than £5,000; and (b) on the expectation that such funds will be raised through crowdfunding on the CrowdJustice website. If such funds are not raised, or if the Court orders that my potential liability is increased and such additional funds cannot be raised, then I would have no option but to withdraw from the proceedings. I understand that I may be liable for some limited costs up until the point of any such withdrawal, and Plan B will indemnify me in respect of any such costs if they cannot be funded by Crowdfunding.
12. For the benefit of the Court, I set out a financial schedule and related information in accordance with CPR Rule 45.2 in a confidential annex to this witness statement.

STATEMENT OF TRUTH

I believe that the facts in this witness statement are true.

Signed 

Lily  Johnson

Dated 04/12/2017