



BEHIND THE BADGE

Understanding the roles, reach, and risks of fossil fuel industry participation in UN climate talks

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Working paper

Behind the Badge

Understanding the roles, reach, and risks of fossil fuel industry participation in UN climate talks

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INTRODUCTION

The Conference of the Parties (COP) to the UN Framework Convention on Climate Change (UNFCCC) is the world's largest annual climate event, bringing together tens of thousands of participants from governments, international organisations, businesses, and civil society. With such scale and visibility, the conference naturally draws a broad spectrum of stakeholders – those advocating for urgent climate action and those with interests that may be threatened by such action.

In recent years, the growing presence of actors linked to the fossil fuel industry and other highly polluting sectors at COPs has sparked increasing controversy.¹ As the scope of the conferences has expanded, so too have concerns about the influence of powerful interest groups and their lobbyists operating behind closed doors. While these concerns are not new,² they have gained renewed urgency as international climate action continues to fall short of the ambition required by climate science.³ In 2022, the Intergovernmental Panel on Climate Change (IPCC) identified vested interests as one of the greatest obstacles to ambitious climate action globally.⁴

Civil society organisations (CSOs) frequently point to the presence of stakeholders whose interests conflict with ambitious climate goals as a factor undermining both the outcomes and the credibility of the process.⁵ A core concern lies in the ability of these stakeholders to meaningfully access and potentially influence climate negotiations, in the absence of any formal UNFCCC requirement to declare potential conflicts of interest. A conflict of interest broadly describes a situation in which an individual or entity faces competing obligations between their official responsibilities and private interests, in a way that could compromise the impartiality of decisions or actions.⁶

In the context of the UNFCCC, conflicts of interest can be particularly problematic when the interests of participants, including negotiators or observers, clash with the overarching goals of the Convention. As the Convention aims to “prevent dangerous anthropogenic interference with the climate system,” individuals or groups representing companies whose business models rely on continued fossil fuel extraction may, by definition, have objectives that diverge from this mandate.⁷ This misalignment raises the risk that their involvement could distort or delay policy outcomes. To bring greater attention to this issue, in August 2022, a total of 126 CSOs submitted a joint call for the establishment of a UNFCCC Accountability Framework to guard against undue influence by “polluting interests”, including fossil fuel, big forest and agribusiness industries.⁸

To date, the UNFCCC has taken only limited steps toward addressing the perceived lack of transparency. For example, the introduction of a requirement to declare participant affiliations during the registration process was a step forward, but the declarations are not monitored, and no formal system exists for screening or managing potential conflicts of interest. While the concept of conflict of interest is increasingly acknowledged in discussions among both Parties and observers, it has yet to be formally recognised or defined by the Parties themselves. This lack of a shared definition is a critical barrier to meaningful reform.

This governance gap leaves the door open to undue influence, erodes public trust, and calls into question the integrity of international climate negotiations. Transparency International has long advocated for stronger safeguards to protect the integrity of international climate governance, including adoption of clear and enforceable conflict of interest rules and greater transparency in the role and influence of non-state actors.⁹

It is important to clarify that conflicts of interest are not synonymous with corruption. However, they can have corrosive effects on decision-making if left unchecked.¹⁰ The same applies to lobbying, which when conducted transparently and on an equal footing, can contribute to well-informed policymaking. But lobbying becomes

problematic when it is opaque, unregulated, or dominated by powerful private actors, as it risks distorting outcomes in favour of narrow interests.¹¹

When unregulated lobbying intersects with unresolved conflicts of interest, the risk of undue influence increases significantly.¹² This dynamic can result in climate policies that prioritise private or corporate gain over the broader public interest. In extreme cases, it can lead to policy capture, where decision-making consistently serves specific groups rather than the common good.¹³

In this context, it is increasingly important to determine who lobbies for fossil fuel interests at COPs, how they gain access to negotiations, and the ways in which they might engage with or influence the process. Meaningfully addressing the integrity of climate negotiations requires a clearer understanding of those involved: their roles, affiliations, and relative access. While many may seek to delay or obstruct ambitious action, they do not all operate in the same way or with equal influence.

This working paper contributes to that understanding by developing a categorisation of fossil fuel-affiliated groups at COPs and analysing the channels through which they may influence negotiations. It draws on research from Transparency International's Climate Governance Integrity Programme (see Box 1), and aims to clarify the nature of their involvement and potential leverage within the process.

The paper does not claim that lobbying by fossil fuel interests alone explains the limited progress on climate action. The international climate regime is shaped by a complex interplay of political, economic, and geopolitical factors. Nonetheless, lobbying can influence which climate solutions are advanced, how certain debates are framed, and which stakeholders are prioritised. Understanding this dynamic is essential to protecting the legitimacy and effectiveness of the UN climate process.

To that end, the paper concludes with recommendations addressed to the UNFCCC and the upcoming Brazilian Presidency of COP30 to help foster a more transparent, equitable, and accountable negotiation environment.

Box 1. Background and methodology

In March 2025, Transparency International and 263 organisations – including Greenpeace, World Wide Fund For Nature (WWF), and ActionAid Brasil – alongside prominent voices such as Carlos Nobre and Camille Étienne, issued an open letter calling for a major overhaul of the UN climate negotiations. The letter urged reforms to enhance transparency standards and revise the process for selecting COP presidencies. It warned that fossil fuel and other high polluting industry actors have consistently obstructed real solutions and ambitious climate action, prioritising their own interests over the urgent need for change.¹⁴

This working paper was developed in response to these concerns. It was researched and written in spring 2025 by Transparency International's Climate Governance Integrity Programme, with the aim of better understanding the scale and nature of the problem raised by CSOs over the years.

The research process involved a review of key UNFCCC procedural documents, including participation handbooks, accreditation rules, and relevant policies, as well as academic and civil society literature on lobbying and influence in international climate governance. The paper further draws on several primary data sources, including the UNFCCC's official List of Participants for COP29¹⁵ and the list of "fossil fuel lobbyists" compiled by the Kick Big Polluters Out (KBPO) coalition.

In addition, the paper draws on 36 anonymous semi-structured interviews conducted in spring 2025. These interviews included 18 high-level country negotiators from diverse backgrounds, 10 from industrialised countries listed in Annex I of the Convention, and eight from developing (non-Annex I) countries, as well as a comparable number of observers. Together, they offer valuable insights into perceptions of access, influence, and integrity risks within the COP process.

WHO COUNTS AS A FOSSIL FUEL LOBBYIST?

According to Transparency International, lobbying is defined as “any activity carried out to influence a government or institution’s policies and decisions in favour of a specific cause or outcome”.¹⁶ Such efforts are typically carried out by individual firms, or associations of individuals or organisations with shared concerns or goals, commonly referred to as interest groups.¹⁷ Lobbying activities can take many forms, ranging from direct and indirect engagement with decision-makers to public relations campaigns.¹⁸

In the context of COPs, a *lobbyist* can be understood as an individual or group representing a particular interest and seeking to influence the negotiation process in favour of that interest. This can include representatives of state delegations (Parties). This influence may be exerted through various channels before or during the conference, including direct communication with Party negotiators and the COP Presidency, interventions in negotiation spaces, the provision of expertise or technical input (such as submissions or policy briefs), participation in side-events and pavilions, as well as through media engagement and public messaging. A *fossil fuel lobbyist* then refers to any individual with direct or indirect ties to the fossil fuel industry who seeks to influence COP outcomes in ways that protect or promote continued fossil fuel use.

In practice, however, it is difficult to identify exactly who the lobbyists are and how they are embedded in the delegations. This is due to two main factors.

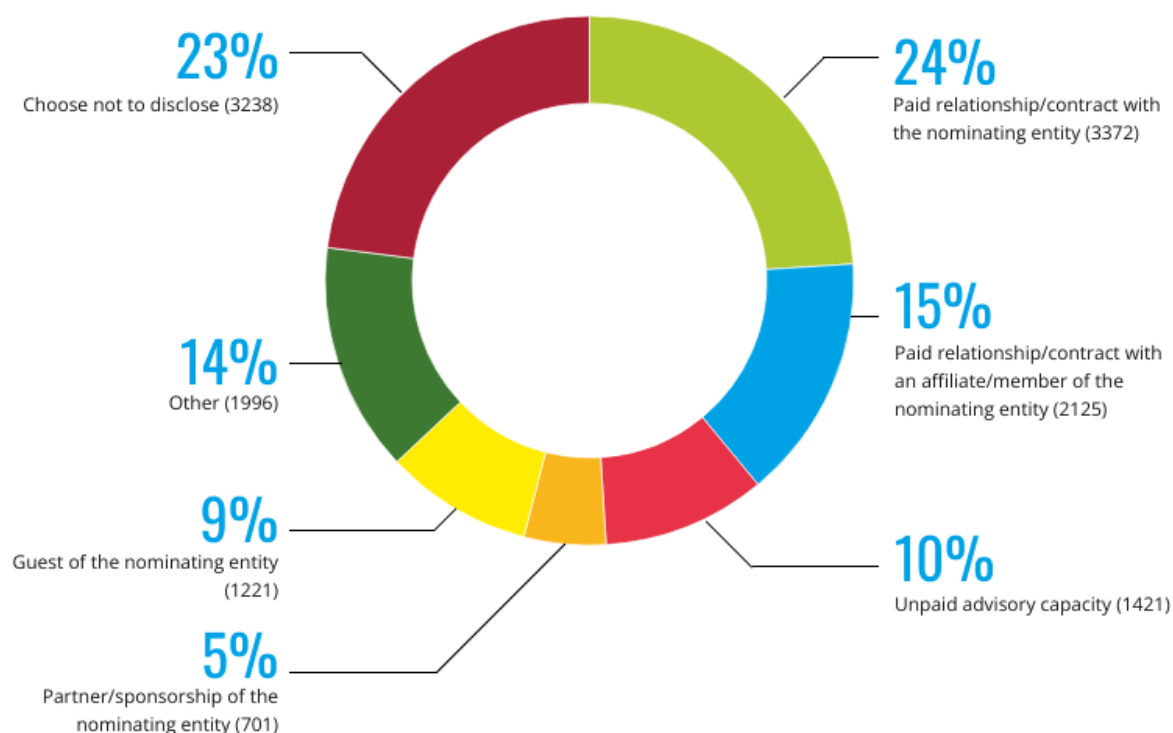
First, it is not straightforward to determine who attends COP and in what capacity. Each year, a growing number of individuals gain access to COP through official delegations, which can be categorised into representatives of Parties to the Convention and observer states, representatives of observer organisations (including UN bodies, non-governmental organisations (NGOs), and international organisations) and media.¹⁹

In an effort to increase the transparency at the COPs, the UNFCCC Secretariat introduced updates to the registration process for all conference participants in 2023.²⁰ The List of Participants, which previously only listed Parties and observers, now lists all types of credentials, including those of guests of the host country and members of the media. As part of the registration process, delegates are now asked by the UNFCCC Secretariat to indicate their affiliation and relationship to the organisation or delegation that gave them a badge. “Home organisation/affiliation”, which was previously optional, and has been made mandatory since COP28. Yet, participants can opt out of disclosing their relationship to the nominating entity, in which case the official list records their response as “Chose not to disclose.”

Analysis of the COP29 List of Participants reveals that almost 15 per cent of all participants (6,209 individuals) chose not to disclose their affiliations. Of these, over 90 per cent held official national badges, designated as either “Party” or “Party overflow” delegates. Figure 1 presents the responses submitted by Parties under the relationship declaration field for COP29, revealing a concerning trend: 23 per cent of Party delegates (i.e., official negotiators) chose not to disclose their affiliations to the nominating state, ministry or agency.

An additional 23 per cent selected ambiguous options such as “Other” or listed themselves as “Guests.” Moreover, the field is often completed incorrectly and allows free-text input, resulting in over 400 unique entries under the “relationship” column. This lack of standardisation significantly hampers transparency and makes systematic analysis of delegate affiliations challenging.

Figure 1: COP29 country negotiators (Parties) by type of affiliation with the entity that selected them.



Source: UNFCCC, COP29 List of Participants

As the Secretariat's role is primarily facilitative, it lacks the mandate to verify the accuracy of these declarations. These responsibilities lie with the Parties themselves. Without accurate data, it is impossible to identify or verify potential conflicts of interest.

CSOs seeking to identify "lobbyists" at COPs typically rely on information provided in this official List of Participants. This includes both the type of delegation under which an individual is registered (e.g., Party, observer organisation, etc.) and any additional affiliation the delegate has chosen to disclose. If a delegate does not explicitly indicate a connection to a fossil fuel company or a fossil fuel-linked entity, it becomes more difficult to identify them as a "fossil fuel lobbyist".

At COP29, for example, no details of the affiliations of any of the members of the Saudi delegation were published, with many delegates simply listing "Riyadh" or "KSA" (meaning the Kingdom of Saudi Arabia) as their home organisation. This lack of transparency around members' affiliations makes it nearly impossible to assess potential links to fossil fuel interests based on the list alone. For instance, during COP28 in Dubai, Global Witness reported that at least 15 members of the Saudi delegation had names matching employees of the state oil company, Saudi Aramco, despite not declaring this affiliation.²¹ This suggests that the relationship disclosure field may be largely symbolic in practice, with limited efforts by the UNFCCC Secretariat to verify or enforce its accuracy, undermining its intended purpose of enhancing transparency and accountability.

To fill these gaps, the Kick Big Polluters Out (KBPO) coalition combines manual classification with artificial intelligence (AI) tools to identify "fossil fuel lobbyists". Using the official UNFCCC List of Participants, KBPO programmatically searches for each registered organisation and delegation online to uncover potential links to the fossil fuel industry. These searches draw on publicly available sources such as company websites, social media profiles, news coverage, and other digital records.²² The KBPO used this methodology to find that 1,770 "fossil fuel lobbyists" attended COP29 in 2024.

However, a further complication is the lack of agreement on how to define a “fossil fuel lobbyist”. As noted above, to qualify someone as a fossil fuel lobbyist, there generally needs to be evidence of direct or indirect ties to the fossil fuel industry and an intent to influence climate negotiations in ways that protect or promote continued fossil fuel use. Yet, different organisations apply varying definitions and thresholds when identifying such individuals.

For example, Global Witness argues that “it is reasonable to assume that anyone who applied to attend COP is attempting to influence the policy debate around climate change”.²³ The KBPO coalition defines a fossil fuel lobbyist as “any individual delegate that represents an organisation or is a member of a delegation that can be *reasonably assumed* to have the objective of influencing the formulation or implementation of policy or legislation in the interests of the fossil fuel industry, or a particular fossil fuel company and its shareholders” (emphasis added).²⁴

This wider definition can capture a greater range of stakeholders, but as some researchers have pointed out, it may also overestimate the number of lobbyists by including companies that are actively transitioning to renewables.²⁵ A case in point is Ørsted, a Danish energy company that has shifted most of its investments toward renewable energy and according to the company’s own reporting is on track to meet its target of 99 per cent “green” share of energy generation in 2025.²⁶ At the same time, relying on public data may undercount lobbyists by missing undeclared or indirect affiliations with fossil fuel interests.

Ultimately, methodologies based on publicly disclosed information often yield conservative estimates rather than a full accounting of fossil fuel-linked participants. It is also important to recognise that identifying fossil fuel lobbyists is only part of the broader picture of stakeholders who may seek to obstruct meaningful climate action and global decision-making. In addition to fossil fuel interests, representatives from other major emitters, such as those from the world’s largest dairy, meat, and pesticide industries, also attend COP negotiations in significant numbers, as *DeSmog*’s analysis shows.²⁷

Despite the definitional challenges outlined above, this paper adopts a pragmatic approach to discuss fossil fuel lobbyists. Ideally, each individual’s activities and intent would be assessed on a case-by-case basis. However, in the absence of systematic disclosure and verification mechanisms, we rely on affiliations as a proxy for identifying individuals or groups with a likely conflict of interest with the objectives of the Convention. While this does not necessarily mean that such individuals are actively engaging in lobbying at COPs, it signals the need for greater scrutiny of their presence and potential influence. Accordingly, we use the term “fossil fuel lobbyist” to refer to individuals with direct or indirect ties to fossil fuel interests whose participation raises concerns about undue influence, drawing on data such as that compiled by the KBPO coalition. We acknowledge the limitations of this categorisation but consider it a necessary starting point for understanding risks to the integrity of the process.

FOSSIL FUEL LOBBYISTS AT COPS: WHERE TO FIND THEM?

Now that we have outlined who may be considered a fossil fuel lobbyist at COP, it is important to reflect on how these groups differ in terms of where they are situated within the COP ecosystem, and, crucially, what forms of access and influence they are able to exert. This is important because, while many fossil fuel lobbyists may share the broader objective of obstructing or delaying ambitious climate action, their specific aims (their motivations for attending COP and what they seek to achieve) along with their levels of influence, can vary significantly. Understanding these distinctions is essential for assessing where conflicts of interest are most likely to arise, particularly where private or organisational goals diverge from the objectives of the Convention. Clarifying these distinctions can better inform efforts to strengthen the transparency and integrity of UNFCCC and COP processes.

What we commonly refer to as “COP” is, in practice, made up of several distinct but interconnected spaces. At its core are the formal negotiations between Parties to the UNFCCC, which represent the primary decision-making process. However, much of what takes place at COP occurs outside these negotiation rooms. The Blue Zone (accessible to accredited Party delegates, observer organisations, and media) includes not only the negotiation spaces, but also pavilions, side event areas, and exhibition halls. This broader setting is often described by both negotiators and observers in interviews as a “trade show,” reflecting its atmosphere of commercial branding, networking, and the promotion of technological and policy solutions.

In parallel to the Blue Zone, many COPs also feature a Green Zone, typically managed by the host country, which is open to the general public and non-accredited stakeholders. This space often includes exhibitions, cultural events, youth forums, and panels designed to promote climate awareness and showcase national or local climate initiatives.

Here we unpack fossil fuel-linked stakeholders based on their roles and the spaces they occupy in the Blue Zone, as indicated by their badge types. This analysis explores their distinct functions, formal access, and potential influence within the negotiation process at COP, where final political decisions are negotiated and adopted, and where questions of access, influence, and transparency become most visible and consequential.

COP PRESIDENCY REPRESENTATIVES

Each year, the COP Presidency rotates among the five UN regional groupings: African States, Asia-Pacific States, Eastern European States, Latin American and Caribbean States, and Western European and Other States. The country holding the Presidency typically also hosts the conference.

The COP Presidency’s formal mandate is to organise the conference while remaining impartial. However, it still has a significant procedural authority, and plays a major role in shaping the agenda, convening heads of states and governments, and steering the process towards consensus. So, the Presidency team plays a crucial role in influencing both the direction and ambition of the conference.

In recent years, the choice of petrostates such as the United Arab Emirates (UAE) and Azerbaijan to hold the Presidency, and the appointment of individuals with close ties to the fossil fuel sector as COP Presidents, has raised serious concerns among the global climate community about the integrity of the process and the potential

for conflicts of interest.²⁸ As the COP Presidency enjoys high visibility, including the opportunity to spotlight particular issues and narratives during high-level segments, this platform can be used not only to promote climate ambition, but also to legitimise narratives that downplay or delay action or to prioritise and legitimise specific “solutions” (see Box 2).

The COP Presidency (whose mandate typically spans a full year) also engages directly with high-level government representatives and other stakeholders. CSOs have increasingly pointed to the risk that such privileged access is used to promote and conclude bilateral deals on the sidelines of COP itself, or during the broader term of the Presidency. Investigations have uncovered such practices in both the UAE and Azerbaijan, where meetings with the Presidency were used to push oil trade and investment opportunities.²⁹ While this does not necessarily have a direct impact on the negotiations, using the COP Presidency as a means to negotiate agreements on fossil fuels can undermine the credibility of the conference, and divert the organising team’s attention and resources away from core COP-related responsibilities. More importantly, however, it violates UNFCCC’s Code of Ethics, which prohibits COP representatives from using their role “as a means to seek private gain”.³⁰

Yet the Presidency can also play a positive and decisive role in delivering ambitious outcomes. The last two COPs offer a revealing contrast. While both were publicly perceived to be influenced by fossil fuel interests, their results diverged significantly.

Under the UAE Presidency, COP28 delivered a historic outcome: the first ever agreement to include language on the “phase-out of fossil fuels.” This was achieved despite strong pushback from the Organisation of the Petroleum Exporting Countries (OPEC), of which the UAE is a member.³¹ In contrast, the Azerbaijani Presidency at COP29 appeared more susceptible to pressure from fossil fuel lobbying. Reports surfaced that Saudi Arabia was granted direct access to modify the negotiation text, which is an unusual breach of standard procedure. As *The Guardian* reported, negotiation texts are normally shared as non-editable PDFs with all Parties at the same time, and giving one country editing access had risked placing the entire COP in jeopardy.³²

These contrasting outcomes highlight the pivotal role of the COP Presidency not only in coordinating talks, but in ensuring the integrity of the process. How a Presidency handles pressure from parties resistant to climate ambition can make or break progress.

The upcoming Brazilian Presidency has been met with cautious optimism. It is being led by experienced climate negotiators and national environmental authorities.³³ However, given the strength of Brazil’s agribusiness lobby³⁴ and the significant role that Petrobras, a state-controlled oil and gas company, plays in the national economy and energy sector,³⁵ close scrutiny of the Presidency’s organisation, priorities, and neutrality will be essential. Box 3 presents Transparency International’s integrity recommendations to the COP30 Brazilian Presidency.

Box 2. The speech by Azerbaijan’s President Ilham Aliyev at COP29

During the opening ceremony of the World Leaders Climate Action Summit at COP29, Azerbaijan’s President Ilham Aliyev described natural resources - “whether it’s oil, gas, wind, sun, gold, silver, copper” - as “a gift from God.” He went on to argue that countries “should not be blamed for bringing these resources to the market because the market needs them. The people need them,” before adding: “As the President of COP29, of course, we will be strong advocates for the green transition, [...] but at the same time, we must be realistic.”³⁶

While President Aliyev expresses support for renewable energy and outlines Azerbaijan’s green agenda in his speech, his tone and framing reveal that he sees fossil fuels not as a problem to be phased out, but as a legitimate and necessary part of the global energy system. These remarks contradict the IPCC recommendations and echo the fossil fuel industry’s messaging, as documented by InfluenceMap, particularly in portraying fossil fuels as essential to economic development and shifting responsibility for emissions onto consumers rather than producers.³⁷

Box 3. Transparency International's integrity recommendations to the COP30 Brazilian Presidency

To help limit the influence of fossil fuel lobbyists and other major polluting interests at COP30, Transparency International urges the Brazilian Presidency to adopt a series of voluntary integrity measures. These steps fall within the remit of the COP Presidency and do not require formal approval from the UNFCCC. By implementing them, the Brazilian Presidency can build national and international trust, set a new benchmark for future COPs, and catalyse broader integrity reforms within the UNFCCC process.

Recommended integrity measures:

1. **Declaration of independence from high polluting interests.** The COP30 Presidency should adopt and publish a declaration stating that no member of the Presidency team currently has ties with fossil fuel or other major polluting industries. This includes both paid and unpaid roles in high-polluting companies, trade associations, consultancy firms contracted by such industries, and state-owned polluting enterprises.
2. **Commitment to avoid promoting polluting interests.** The declaration should also commit that the COP30 Presidency will not be used, directly or indirectly, to promote fossil fuel or other high-polluting industry deals, investments, or partnerships.
3. **Conflict of interest policy.** The Presidency team should adopt a robust conflict of interest policy that ensures the transparency of the interests of representatives or lobbyists from the fossil fuel and high-polluting sectors within the team. The policy should require regular updates and reviews of disclosures throughout the COP cycle in order to manage emerging conflicts of interest. It should also include provisions for sanctions in cases where individuals with unresolved conflict of interests are identified.
4. **Transparency on team composition.** The full list of COP30 Presidency team members, including their organisational affiliations, should be published, regularly updated, and accessible as the team evolves.
5. **Meeting disclosure.** The Presidency should publish details of all meetings taking place in preparation for COP30 in a clear, accessible format. This should include meeting times, participants, their affiliations, the meeting agenda, and key outcomes.
6. **Transparency on contracts and partnerships.** Information on all contracts, consultancies, and partnerships relating to COP30 should be made publicly available in an accessible format. This should include the names of partner organisations, the purpose and scope of the collaboration, and any financial arrangements involved.

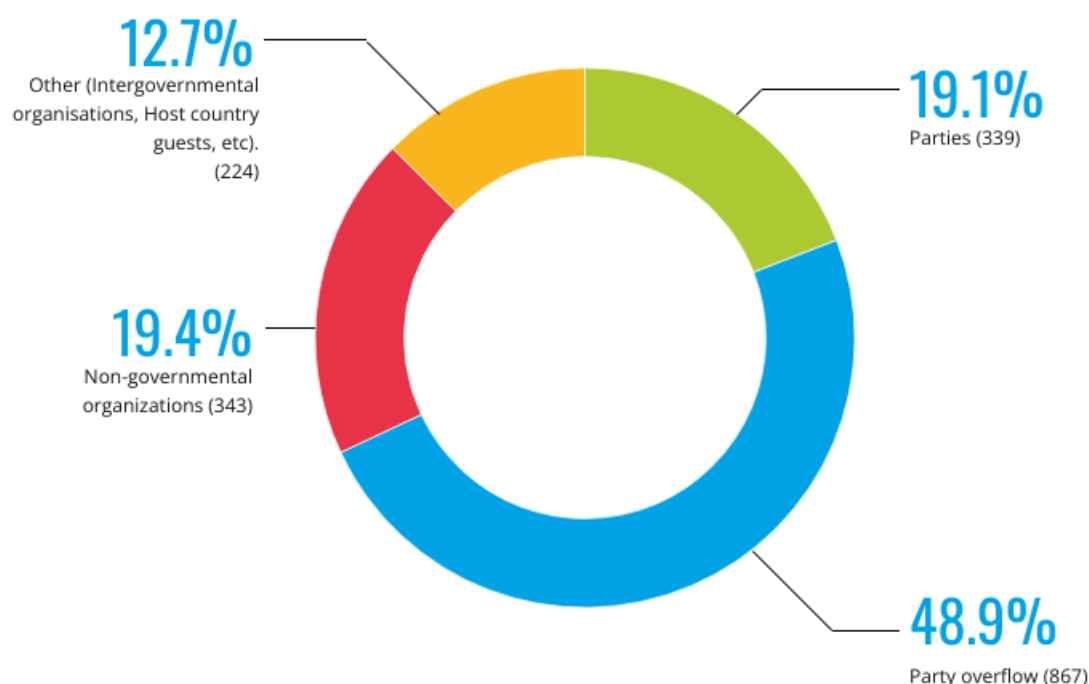
By voluntarily implementing these measures, the Brazilian Presidency can demonstrate leadership in safeguarding the integrity of the COP process and advancing climate action free from fossil fuel interests.

PARTY DELEGATES

Party delegates, i.e. negotiators, are official representatives of countries that have ratified the UNFCCC. These individuals are typically public servants from ministries such as environment, foreign affairs, or energy, as well as affiliated technical or legal experts in a paid or contractual relationship with the nominating ministry or agency. Each country's delegation is led by a Head of Delegation (usually a senior ministry official) who coordinates negotiation efforts and articulates the country's official position.

Delegations may also include pro bono legal advisers to help interpret negotiating texts and advise negotiators, and, in some cases, non-state actors from civil society or the private sector who provide sectoral or subject-matter expertise. According to the COP29 List of Participants, around 19 per cent of negotiators declared themselves as unpaid advisers or guests of the nominating entity (Figure 1). The Party delegate badge itself does not reflect the delegate's professional background and does not distinguish between public officials, advisers, or other types of delegates. As a reference point, Box 4 outlines OECD good practice recommendations concerning the transparency and integrity of advisory and expert groups participating in conferences, panels, and delegations.

Figure 2: Lobbyists at COP29 by badge type (as identified by KBPO).



Source: KBPO

Since each country determines the composition of its negotiating team, one of the key avenues for stakeholders linked to the fossil fuel industry to gain access to COP is through national delegations. This allows them to access all the negotiation rooms. In the negotiating teams, they can further contribute to the development of the national position and the negotiation strategy, and, in coordination with the delegation, provide input during the negotiation process, e.g., interventions, submissions, statements, etc.

Analysis of KBPO's data from COP29 revealed that, of the 1,773 individuals identified as "fossil fuel lobbyists," nearly 20 per cent were found within national delegations (Parties), i.e., they were registered as negotiators (see Figure 2). The majority of these delegates were affiliated with state-owned or partially state-owned fossil fuel companies. Based on information from company websites and official reports, our analysis found that out of the 339 identified "lobbyists" within national delegations, approximately 74 per cent (252 individuals) were linked to entities with full or partial state ownership, while around 23 per cent (81 individuals) were affiliated with private fossil fuel companies or independent trade associations. For the remaining six individuals (roughly two per cent), ownership status could not be verified due to insufficient publicly available information.

The following examples from COP29 underscore this pattern. According to the List of Participants, the Russian delegation included negotiators from Gazprom, a majority state-owned energy giant. Azerbaijan's delegation featured at least 16 members from SOCAR, the national oil and gas company. Brazil, which will host COP30, brought seven delegates affiliated with Petrobras, the majority state-owned oil and gas company. The national delegations with the largest number of representatives from private sector fossil fuel companies, based on the KBPO data, were Russia with at least 36 delegates linked to private firms in the sector, followed by Oman with 18, and Qatar with 12.

What does this tell us about the fossil fuel lobby and its influence on climate negotiations? These numbers reveal that the majority of "lobbyists" attending as negotiators are, in fact, representatives of state-owned or state-affiliated enterprises. Additionally, in countries like Russia, where the highest number of negotiators linked to private fossil fuel firms was recorded, the line between public and private sectors is further blurred, and business interests are often tightly intertwined with those of the state.³⁸

It is perhaps unsurprising, then, that in contexts where the fossil fuel sector is publicly owned or politically embedded, the interests of national fossil fuel companies are routinely reflected in official state negotiating positions.³⁹ This convergence of interests makes it difficult to distinguish between state and industry agendas at COPs. It also suggests that fossil fuel influence is not solely a matter of who is physically present at the talks. Because negotiation mandates are typically developed well in advance of COP, domestic lobbying and fossil fuel-aligned positions formed at the national level may already be baked into a country's stance, constraining the potential for ambitious national positions before the conference even begins.

Box 4. OECD Recommendations on Transparency and Integrity in Lobbying and Influence

In February 2010, the OECD Council adopted the *Recommendation of the Council on Transparency and Integrity in Lobbying*.⁴⁰ This became the first international standard aimed at addressing transparency and integrity risks associated with lobbying practices. The recommendation was revised in May 2024 to reflect new challenges and emerging forms of influence.

Among other areas, the revised recommendations specifically address the role of advisory and expert groups in conferences, panels, and delegations. The OECD calls on adherents to implement transparency and integrity frameworks for all individuals and organisations that provide advice to governments. This includes advisory and expert groups, individual advisers, external consultancies, and official delegations to intergovernmental fora. Specifically, adherents are encouraged to:

- a) Publicly disclose information on the funding and functioning of advisory and expert groups, including information on their members and other persons who participate in providing advice to government, such as their private interests and their current and past professional affiliations.
- b) Provide rules that promote transparency, integrity and inclusiveness in advisory and expert groups, including procedural guidelines, standards of conduct and conflict of interest provisions.
- c) Establish clear safeguards for any individual or external consultancy organisation providing advice or expertise to the government, to ensure transparency, integrity, and the management of potential conflicts of interest.

PARTY OVERFLOW DELEGATES

Delegates with Party overflow badges are government listed observers who cannot speak on behalf of the country. According to Figure 2, nearly half of the “fossil fuel lobbyists” at COPs attend using this badge. Analysis of COP28 data similarly shows that these badges were the most common type assigned to the fossil fuel industry-linked individuals.⁴¹

The allocation and use of overflow badges varies significantly between countries. As evidenced in the List of Participants, some Parties use these badges to include researchers, youth activists, or representatives of “green” businesses with an interest in negotiations and broader COP-related activities. Others may grant it to individuals scheduled to speak at national pavilions or side events.⁴² According to interviews with Party negotiators, some countries may offer them to CSOs that lack official UN accreditation.

In principle, individuals holding overflow badge do not automatically enjoy greater access to negotiations vis-à-vis other observers. Interviews with senior negotiators suggest that these delegates are generally not permitted to attend internal coordination meetings of Party delegations. Moreover, when negotiation sessions move into closed formats, Party overflow badge holders are usually required to leave the room alongside other observers. However, in practice, the rules and their implementation can vary. At COP29, for example, access to negotiation rooms by Party overflow delegates was allowed only if space permitted, after accredited observers had already been admitted.⁴³ This approach reportedly aimed to address past concerns that observers were being excluded from rooms due to the high number of Party overflow delegates.

Nevertheless, this is not a consistent rule across all UNFCCC meetings. During a recent UNFCCC Secretariat observer briefing for the June Climate Meetings in Bonn (SB62), Secretariat staff stated that, if rooms reach capacity, observers must leave to make space for Party overflow delegates. This suggests that, in some instances, overflow badge holders are still prioritised over observers. Additionally, some national delegations may apply internal discretion when involving overflow badge holders in briefings or informal discussions, meaning actual practices can differ significantly from official protocols.

The unregulated and opaque distribution of overflow badges by Parties raises growing concerns. Observers interviewed for this research have expressed concerns that excessive issuance of these badges by Parties can crowd out accredited observers, limiting their ability to participate meaningfully. As access becomes restricted, NGOs may feel compelled to seek Party overflow badges themselves. However, as the RINGO (Research and Independent NGOs constituency) coordinator has pointed out, this often puts countries “in the position of controlling NGO access” and risks undermining the openness and transparency of the negotiation process.⁴⁴

At present, there appears to be no upper limit on the number of overflow badges a Party may issue. At COP29, the number of such delegates varied dramatically across countries, ranging from a few individuals to several hundred. Table 1 lists the top ten countries by number of overflow delegates at COP29. In total, 14,074 people attended the conference under this category. The host country, Azerbaijan, issued the most (1,130), followed by Russia (757) and Brazil (649), which is set to hold the COP30 presidency.

Officially, Parties may justify these accreditations on the grounds that such individuals are observing the process or participating in pavilion events and side sessions. For example, *DeSmog* has reported that senior executives from BP, ExxonMobil, and Eni were issued EU overflow badges for COP28 on the basis that they were panellists at EU-organised events. Since EU countries negotiate as a single Party at climate talks, this allows the EU to issue such badges under its delegation. However, it was later revealed that at least two of the executives who were granted badges did not participate in any such events, raising serious questions about the accuracy of the justification provided by Wopke Hoekstra, the EU Climate Commissioner, and more broadly, about the role and oversight of overflow delegates.⁴⁵

Interviews conducted for this research further reveal that many negotiators are uneasy about the presence of fossil fuel representatives with Party overflow badges. Some negotiators expressed concern about what these delegates might be saying during informal exchanges or while networking in private spaces, raising questions about the unmonitored influence they might exert. This speaks to a broader issue: once a Party grants an overflow badge, it has little oversight of how that individual engages with others at the conference.

Table 1: Top 10 countries with the highest number of delegates at COP29 with Party overflow badges. Source: UNFCCC, COP29 List of Participants

Country	Total (14,074)
1. Azerbaijan (host of COP29)	1,130
2. Russian Federation	757
3. Brazil (host of COP30)	649
4. Türkiye	395
5. UAE (host of COP28)	379
6. Uzbekistan	304
7. USA	234
8. Malawi	203
9. China	194
10. Israel	190

Box 5. The UNFCCC constituencies

The UNFCCC has a constituency-based system in which observer organisations organise themselves into the following nine groups:

- **BINGOs:** Business and industry NGOs
- **ENGOS:** Environmental NGOs
- **RINGOs:** Research and independent NGOs
- **IPOs:** Indigenous People's organisations
- **TUNGOS:** Trade union NGOs
- **WGC:** Women and Gender Constituency
- **YOUNGOS:** Children and youth NGOs
- **LGMAs:** Local government and municipal authorities
- **Farmers:** Farmers and agricultural NGOs

OBSERVERS

Observers are representatives of UN organisations, intergovernmental organisations (IGOs), and NGOs. Broader COP data indicates that the participation of non-state actors in the climate negotiation process as well as the scale of observer-related activities at COP has grown significantly over the years, particularly through side events, exhibits, and pavilion programming.⁴⁶

Among observers, NGOs represent the largest and most diverse group. These organisations have links with a variety of groups, ranging from research institutes and youth-led initiatives to private sector companies. NGOs are categorised into nine constituencies (see Box 5). To participate, an NGO must first be admitted to the UNFCCC as an observer organisation. The UNFCCC publishes and regularly updates the list of all admitted organisations.⁴⁷ For-profit entities and individuals cannot register as observers independently. Instead, private sector stakeholders may only observe the COP process through the Business and Industry NGOs (BINGO) constituency, i.e. attending COP via a trade association or a business NGO. Alternatively, they can gain access as an observer through a Party overflow badge, as discussed above.

The BINGO constituency is not homogeneous in its policy stances. Some companies, like those in the renewable energy sector, support strong climate action and often back policies that match the goals of the UN climate process. For example, new data from LobbyMap shows that over half of the European companies it tracks are now engaging in the EU level climate policy in ways that are fully or partly aligned with science, showing broad support for the EU Green Deal.⁴⁸

On the other hand, BINGO also includes the representatives of fossil fuel and other high-emitting sectors. According to Figure 2, around 20 per cent of lobbyists classified by KBPO as “fossil fuel lobbyists” at COP29 had observer badges. These individuals may oppose ambitious climate policy domestically while also continuing to participate in COPs. The International Chamber of Commerce, whose representative acts as the BINGO focal point, for example, invited the representatives of ExxonMobil, Shell and BP to COP29, according to the List of Participants.

Once admitted, observer organisations can engage in COP processes in various ways: they may attend and monitor negotiations open to observers, apply to host official side events, rent space for pavilions where they organise panel discussions, and submit official inputs to the negotiation process. For example, OPEC Fund for International Development had rented its own pavilions space in Baku, where they organised various panel discussions on energy transition and development related topics.⁴⁹

In practice, however, opportunities for observers to influence formal decision-making remain limited. For instance, in plenary sessions, time permitting, the COP President or the chairs of subsidiary bodies may offer brief, two-minute speaking slots to representatives of each nine NGO constituencies.⁵⁰ Similarly, while large

spaces at COP venues are dedicated to pavilions and booths for observers, this visibility does not translate into direct influence over negotiations, as many negotiators do not have time to attend side events. For example, of the 18 negotiators interviewed for this study, none had time to attend panel discussions at side events or pavilions during the COP. Nevertheless, the role of non-state observers is consistently acknowledged by the UNFCCC itself as crucial to transparency and accountability within the UNFCCC process.⁵¹

Observers have a wide range of goals when attending COPs,⁵² and this also applies to fossil fuel industry-linked actors. Some aim to influence negotiation outcomes through the limited channels available to them. For example, a leaked internal OPEC document from COP28 revealed that the organisation had urged its 13 member countries as well as 10 OPEC+ allies, including Russia and Mexico to oppose any negotiated language on fossil fuel phase-out and to “proactively reject any text or formula that targets energy, i.e. fossil fuels, rather than emissions”.⁵³

Other non-state observers focus on influencing public opinion and shining a light on negotiations. The Climate Action Network (CAN), for example, publishes a daily newsletter that highlights obstructive behaviour through its “Fossil of the Day” award.⁵⁴ Similarly, the International Institute for Sustainable Development (IISD) produces the *Earth Negotiations Bulletin*, which provides detailed reports on COP proceedings to inform stakeholders who cannot access the negotiation rooms.⁵⁵

As an alternative, non-state observers may spend most of their time at COP in the side event and pavilion areas, where they can engage in various public discussions and debates. It is worth noting that the negotiation process extends beyond the formal meeting rooms. COPs bring together delegates in one location, enabling extensive informal networking.⁵⁶ Many observers use this opportunity to meet with negotiators, offer technical support, and strengthen alliances. The same applies to fossil fuel industry representatives.

RECOMMENDATIONS

To protect the integrity of the UNFCCC process and to secure real climate action including scaling down of fossil fuels globally, it is essential to better define, monitor, and regulate the involvement of actors whose core business interests conflict with the goals of the Paris Agreement. This paper offers a step toward by unpacking where and how these actors may exert influence. The responsibility now lies with State Parties to the UNFCCC, the UNFCCC Secretariat and the COP30 Presidency to take steps in advancing transparency, strengthening conflict of interest rules, and ensuring that climate negotiations serve the public good, not the private profit of fossil fuel and other high polluting industries.

The following recommendations to the UNFCCC are intended to help create a more transparent, equitable and accountable negotiating environment.

DEFINITION AND MANAGEMENT OF CONFLICTS OF INTEREST AND UNDUE INFLUENCE

- The UNFCCC currently lacks clear definitions of *conflicts of interest* and *undue influence* applicable to Party delegates, accredited observers, Host Country Agreements (HCAs), and COP Presidencies. Existing UNFCCC guidance focuses only on the Secretariat's own staff for conflicts of interest and ethics. Other broader guiding documents, including the *UNFCCC Rules of Procedure*, *Guidelines on a Principle-based Approach to the Cooperation between the United Nations and the Business Sector*, and the *Handbook for Hosting UN Climate Change Conferences*, do not define or include safeguards against these risks. The adoption of clear, UNFCCC-wide definitions of *conflict of interest* and *undue influence* is foundational to the integrity of the COP process and essential to implementing the recommendations that follow. One widely supported Accountability Framework proposal already exists,⁵⁷ which the UNFCCC could adopt. Other useful global precedents which the UNFCCC could learn from include but are not limited to the World Health Organization's (WHO) Framework for Engagement of Non-state Actors (FENSA), and the WHO Framework Convention on Tobacco Control (FCTC).

COMPOSITION OF PARTY DELEGATIONS

- Parties should refrain from including lobbyists or representatives from fossil fuel and other high-polluting industries in national delegations. The Secretariat of the UNFCCC cannot bind, but it could encourage State Parties to do so by issuing best practice guidelines for State Delegations.
- Parties should disclose declarations of financial, professional, and other relevant interests for all delegation members in a machine-readable, accessible and open format. The Secretariat of the UNFCCC should encourage State Parties to do so.
- Parties should be encouraged by the UNFCCC Secretariat issued guidelines to use a checklist to screen for potential conflicts of interest and, where relevant, confirm the absence of representation from actors with vested fossil fuel interests.

REGISTRATION AND ATTENDANCE

- The UNFCCC should compel all accredited COP participants to register and disclose their true institutional affiliations, including affiliations with lobbying firms, industry associations, or state-owned companies.
- The UNFCCC should reform the registration system to remove ambiguous “Other” and “Guest” categories that currently obscure the identity of some industry-linked COP participants, as well as make disclosure mandatory.

HOST COUNTRY AGREEMENTS (HCAS)

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

STRENGTHENING THE INTEGRITY OF COP PRESIDENCIES

- The existing UNFCCC Handbook for hosting COPs and / or other Secretariat issued guidelines should stress that the COP Presidencies must be impartial, even if the appointing government has conflicting interests with science-aligned guidance for delivering the 1.5-2 degrees Celsius goal of the Paris Agreement.
- The UNFCCC Secretariat should encourage the disclosure of any situation or relationship, financial or otherwise, that might be potential, perceived or actually affecting the objectivity and impartiality of the COP Presidency in an interest disclosure form that to be made publicly available online. The UNFCCC Secretariat needs to, periodically and, on an ad-hoc basis, check on potential conflicts of interests with COP Presidency Teams.
- The UNFCCC Secretariat should set clear standards for the incompatibility of the position of COP President with any role (remunerated or not) and any holding of financial or vested interests in an entity whose core products, services or operations may negatively affect the objectives, activities or reputation of the UNFCCC, including but not limited to fossil fuels.
- The UNFCCC Secretariat should encourage the public disclosure of all formal and informal meetings held in connection to the role of the Presidency, with an indication of the topics addressed and attendees listed.

- The UNFCCC Secretariat should encourage COP Presidency teams to publish the details of its contracts, partnerships and consultancies on an ongoing basis online in an easily accessible format, including the names of partners, their goal, and scope, and financial implications.
- The UNFCCC should consider setting up an independent ethics committee or COP Presidency integrity advisory group whose mandate and task is to advise COP Presidencies on the above recommendations, pointing out conflict of interest risks, and recommending courses of actions for COP Presidencies to ensure highest levels of integrity, and to establish sanctioning mechanisms should there be breaches to the integrity of COP Presidencies.

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