

For over fifty years, the United States of America has known that carbon dioxide (“CO2”) pollution from burning fossil fuels was causing global warming and dangerous climate change, and that continuing to burn fossil fuels would destabilize the climate system on which present and future generations of our nation depend for their wellbeing and survival. Defendants also knew the harmful impacts of their actions would significantly endanger Plaintiffs, with the damage persisting for millennia. Despite this knowledge, Defendants continued their policies and practices of allowing the exploitation of fossil fuels. ...

Since 1990, Defendants have known that CO2 levels in the atmosphere must be stabilized at or below 350 parts per million (“ppm”) in order to protect our nation’s climate system and that a swift transition away from fossil fuels was necessary. ...

... Defendants have known of the unusually dangerous risks of harm to human life, liberty, and property that would be caused by continued fossil fuel burning. ... Defendants have willfully ignored this impending harm. By their exercise of sovereign authority over our country’s atmosphere and fossil fuel resources, they permitted, encouraged, and otherwise enabled continued exploitation, production, and combustion of fossil fuels, and so, by and through their aggregate actions and omissions, Defendants deliberately allowed atmospheric CO2 concentrations to escalate to levels unprecedented in human history, resulting in a dangerous destabilizing climate system for our country and these Plaintiffs. ...

Through its policies and practices, the Federal Government bears a higher degree of responsibility than any other individual, entity, or country for exposing Plaintiffs to the present dangerous atmospheric CO2 concentration. In fact, the United States is responsible for more than a quarter of global historic cumulative CO2 emissions. ...

Absent immediate, meaningful action by Defendants to cease their permitting, authorizing, subsidizing, and supporting fossil fuel exploitation, production, and consumption, and otherwise to act to phase-out CO2 emissions, Plaintiffs would suffer increasingly severe consequences. By 2100, these Youth Plaintiffs (many of whom should still be alive), and future generations, would live with a climate system that is no longer conducive to their survival.

-United States District Court, District of Oregon - Eugene Division, “Juliana v. United States, First Amended Complaint for Declaratory and Injunctive Relief” (2015) excerpt.