

"CLEAN" AIR
DIRTY MONEY
FILTHY POLITICS

THE BIG BUCKS BEHIND THE UK'S ANTI CAR POLICIES
AND AIR POLLUTION PANICS

#together



November 2023

1 Summary

Philanthropy has vastly exceeded any reasonable definition of ‘charitable giving’. Philanthropists now have extraordinary influence in global agencies, and their interests align academic research and NGOs of all kinds. Since 1999, The Bill and Melinda Gates Foundation has made grants exceeding \$82 billion, including \$4.7 billion granted to the World Health Organization. Grants from the foundation worth \$3.4 billion have been made to organisations based in the UK, including more than \$2 billion to UK universities, and more than \$300 million to Imperial College London. A further \$83 million has been granted to UK news media organisations, and more than \$57 million to UK think tanks.

The green movement follows this model of big global political philanthropy. Following \$multi-billion philanthropic gestures, former Mayor of New York Michael Bloomberg was made Special Envoy by two UN Secretaries General and was appointed to chair quasi-regulatory agencies by then governor of the Bank of England, Mark Carney. The green movement exists almost only because of support from a small number of philanthropic foundations. Green billionaire hedge fund manager, Sir Christopher Hohn, makes grants in excess of \$200 million a year to climate change campaigns. Grants from fewer than ten philanthropic foundations account for well in excess of a \$billion of climate grant-making per year.

Air pollution policies such as ULEZ are proxy battles of the climate war. Organisations that are involved in air pollution policies are wholly funded by climate change interests. Seemingly localist civil society organisations such as C40 Cities, The Global Covenant of Mayors, and UK100, which have lobbied for anti-car and air pollution policies, are funded through Bloomberg and Hohn’s philanthropic foundations. The Clean Air Fund, which supports a range of campaigning organisations and think tanks, was established by Hohn’s philanthropic vehicle, The Children’s Investment Fund Foundation, with a \$21.4 million grant. There are no grassroots air pollution campaigns of consequence.

Philanthropy shapes academic research priorities. Although universities are keen to stress their independence, they closely follow their public and private funders’ agendas. Imperial College, which is at the centre of Covid and air pollution policy controversies, received \$320 million in grants from The Bill and Melinda Gates Foundation. And while the College claims that it doesn’t take funding from fossil fuel interests because that would seem to undermine its research, \$60 million of grants from billionaire Jeremy Grantham have funded the Grantham Institutes at Imperial and LSE, both of which are extremely close to UK climate policymaking.

The public has been excluded from politics. Politicians’ own statements show that the green policy agenda represents a compact between government, civil society, academia, and big business. Experts that depart from the policy agenda are routinely excluded from the public debate by research agendas, editorial policy and cancel culture, depriving the public of debate about the costs and trade-offs of far-reaching policies. Green organisations have worked to form a cross-party consensus at all levels of government, pushing the public interest and democratic representation out of politics. At the local level, air pollution policies have been imposed on populations without due democratic process because independent organisations are overwhelmed by extremely well-funded and well-connected green organisations’ campaigns.

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3 Abbreviations

LTN	Low Traffic Neighbourhood
CAZ	Clean Air Zone
ULEZ	Ultra-Low Emissions Zone
APP	Air Pollution Policy, (recent generation of) such as ULEZ, CAZs, LTNs
CSO	Civil Society Organisation
PNS	Post Normal Science
GLA	Greater London Authority
TfL	Transport for London
BMGF	The Bill & Melinda Gates Foundation
BFF	The Bloomberg Family Foundation
CIFF	The Children's Investment Fund Foundation
ECF	The European Climate Foundation
CAF	Clean Air Fund
COMEAP	The Committee on the Medical Effects of Air Pollutants
ERG	The Environmental Research Group (at Imperial College, London)

4 Background

During the Covid 19 pandemic, a number of policies intended to reorganise roads and city plans to limit the use of private transport and to reduce air pollution were either implemented or advanced. Schemes such as London's Ultra-Low Emissions Zone (ULEZ) and Clean Air Zones (CAZs) elsewhere, and Low Traffic Neighbourhoods (LTNs) are now the subject of intense controversy locally and nationally. Local authorities, with and without cross-party and national government support, have advanced their policies despite significant opposition to these schemes. Rather than opening discussions with local populations, objections have been ignored on the basis of arguments and evidence provided to them by lobbying and Civil Society Organisations (CSOs) and academic researchers, many of whom have been active in policy design, implementation, and campaigning. Thus, a serious democratic deficit exists, and hangs over radical planning decisions, and serious questions about the credibility of scientific guidance persists.

The Together Declaration was formed in 2021 in response to unprecedented Covid-19 management policies. Together's founders and membership believed that the removal of vital political and civil rights and freedoms could not be justified by 'the science'. Since then, achievements range from campaigning successfully against vaccine mandates and harmful lockdown policies, to fighting for the reinstatement of unvaccinated care workers and the protection of free expression. Together membership believes the lack of public debate and the exclusion of critical expert opinion from air pollution and traffic management policymaking is undemocratic and echoes the abuse of power and draconian policies imposed on the public during the pandemic.

Together has joined with many other national and local groups to oppose these new policies, citing the lack of democratic and technical debate, the economic harms that will be done, the loss of freedoms they will cause, the questionable character of much of the scientific and technical evidence given in their support, and the nature of the organisations and processes involved in their formulation. In Spring 2023, Together and Climate Debate UK produced a joint report [1] (referred to as the 'Spring Report' hereafter) on the shortcomings of seemingly science-based claims that an 'air pollution crisis' was the cause of '4,000 deaths per year' in London, and that this could be mitigated by ULEZ and similar policies.

This report builds on our previous work and our insistence that the public must be at the centre of political decision-making across all policy domains. Though air pollution policies may seem to have been driven by grassroots campaigns and scientific evidence, we have investigated these organisations and found that they are in fact almost exclusively supported by a small number of philanthropic foundations that are active in climate change lobbying, which have made air quality a proxy issue for the same agenda. The good intentions of philanthropy and CSOs cannot be taken at face value. And the influence of money and ideology can also be found in the work of institutional science as clear biases, at the expense of important debates between domain experts. Moreover, by working with each other, special interest philanthropic foundations, CSOs, academic researchers and politicians have excluded the public and the public interest from democratic policymaking.

5 Introduction

This report aims to show that Air Pollution Policies (APPs), including ULEZ, CAZs and LTNs, are in large part the consequence of undue influences in politics, rather than the result of either popular will or scientific discovery of a serious problem – an ‘air pollution crisis’. Financial incentive is more likely than scientific agreement and democratic consensus to have caused the alignment of politicians, CSOs, academic research and institutional science.

First, we revisit our Spring 2023 report, [Is there an ‘air pollution crisis’ in UK cities?](#), and responses to it, to state again that we have followed scientific evidence and guidance precisely, and examine what scientists admit is the best result that can be expected from radical APPs.

We then survey a handful of philanthropic foundations to outline some problems with big philanthropy in general and then with philanthropic foundations which are dominant in the climate domain, and finally with philanthropy’s involvement with APPs. This is followed by an examination of some of the grantees of philanthropic foundations involved in campaigning for APPs. This includes a look at the role of Imperial College London – a significant grantee of philanthropic foundations at the centre of a number of controversies around the issue of air pollution.

The survey is followed by an outline of the historical development of the air pollution crisis story, which argues that air pollution is a proxy battle of the wider climate war. Though global and national political agendas had stalled, green CSOs were able to focus their efforts at the local level by reframing climate change as air pollution, in an attempt to gain more political currency with the public.

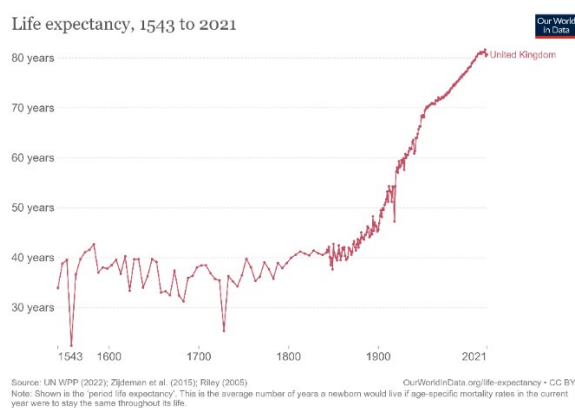
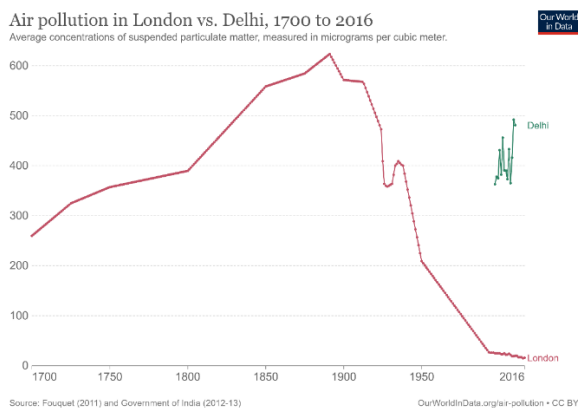
We then conclude by arguing that this story is an indictment of a new compact representing elite politics, comprising governments, business, academia, and civil society, which has hitherto excluded the public. This is followed by some further discussion about the ideological character of both the compact and the green agenda.

6 What is the best that can be achieved by air pollution reduction policies?

- **Air quality and life expectancy have improved radically over the last century.**
- **Claims that there is an ‘air pollution crisis’ do not rest on sound science.**
- **Air pollution policies risk undermining health through economic impacts**

Debates often confuse those who are deeply committed to seemingly good causes and who feel that criticism of their agenda stands in the way of good intentions that ought to be accepted at face-value. Following our Climate Debate UK and Together Spring Report, we were accused of ‘denying the science’, of not being concerned for children’s healthy development, and, citing Together’s past work, of ‘covid denial’ and of being ‘anti vaccines’. These claims have no foundation and reveal that those who made them did not read our report, and so did not understand our criticisms of air pollution and covid policies or Mayor of London, Sadiq Khan’s statements. The key findings of our report are summarised below, and some further points are added.

Our report was primarily a response to claims from APP advocates, epitomised by the London Mayor’s statements that air pollution causes the deaths of 4,000 people in London each year. Such stark claims about the mortality risk of air pollution exposure underpin arguments for radical policies to reduce and eventually eliminate air pollution. But historical data show that air quality in London is likely better than it has been in many centuries, and life expectancy has been increasing in the UK at a rate of approximately 73 days per person per year. There is therefore very reliable evidence that claims about an ‘air pollution crisis’ are unfounded.



Figures 1 & 2. Air pollution in London and life expectancy saw radical improvements over the 20th Century. The notion of an air pollution crisis would therefore seem to lack a historical and statistical foundation.

Our research revealed that rather than being based on science, Khan’s argument depended on controversial statistical estimates of the mortality risk of air pollutants in London, produced by researchers at the Environmental Research Group (ERG) at Imperial College, London [2], the ERG having been commissioned by the Mayor’s office. The statistical method had been developed by the Committee on the Medical Effects of Air Pollutants (COMEAP) in a 2018 report [3] that builds on earlier attempts to understand air pollution risk. COMEAP was convened by the UK government to provide independent advice to policymakers.

A number of important points of context should be understood. Neither ERG's nor COMEAP's work is 'science' as such. Though their reports *may* represent the *judgement of some* scientists, neither body's volume of work is independent (despite their claims), nor are they peer-reviewed or published in scientific journals for the scrutiny of scientific peers. Both bodies were commissioned, by national and local governments that had already determined air pollution to be a policy priority, in advance of the scientific evidence, based on the precautionary approach. Despite being its purpose, COMEAP did not find a consensus to inform policymakers with unequivocal guidance – the consensus that has emerged since being far more political than scientific.

These facts put the work of scientists into a fundamentally different category of 'science' than is conventionally understood as the business of scientists in fields such as physics rather than epidemiology and public health. This form is known in ecological economics as 'Post-Normal Science' (PNS) [4], which is a condition that holds where *'facts are uncertain, values in dispute, stakes high, and decisions urgent'*. According to the authors of the PNS hypothesis, Silvio Funtowicz and Jerome R. Ravetz, the values guiding 'normal' science are, or must be, suspended for policy-based research:

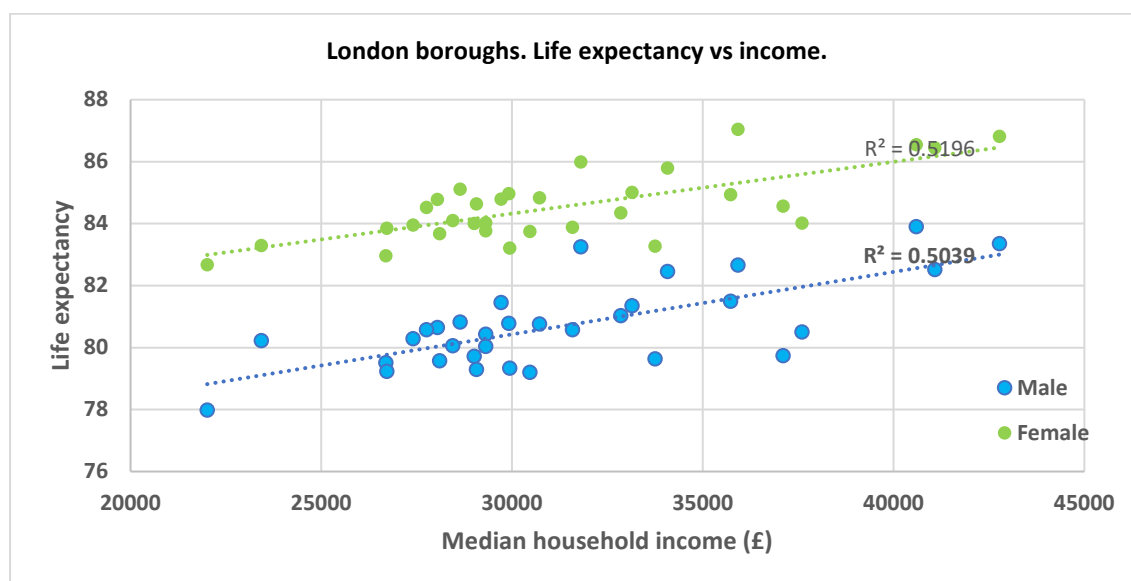
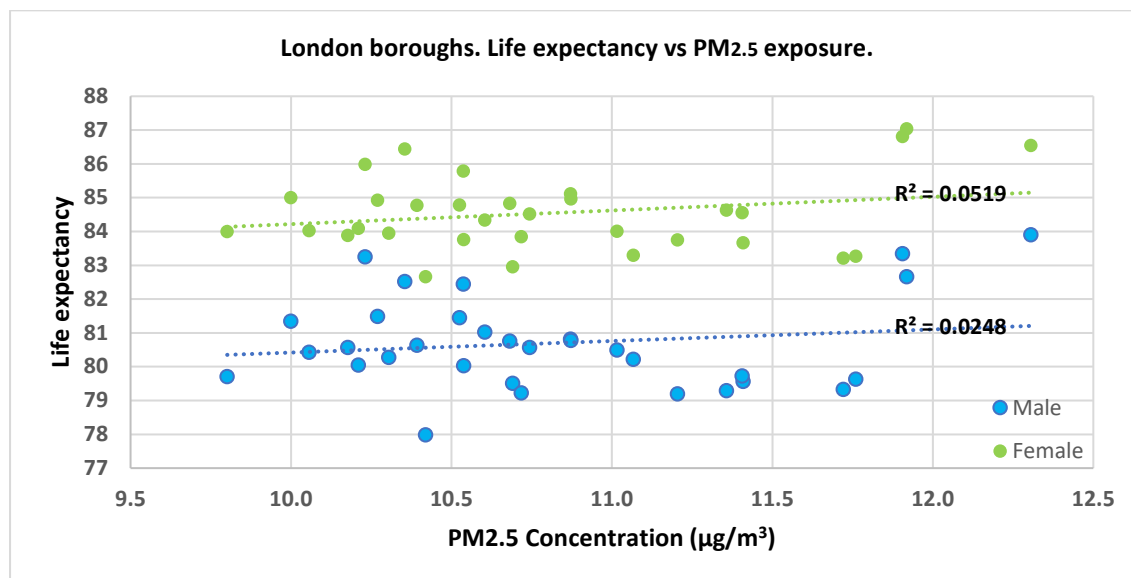
"The traditional distinction between 'hard', objective scientific facts and 'soft', subjective value-judgements is now inverted. All too often, we must make hard policy decisions where our only scientific inputs are irremediably soft." -- Post-Normal Science. S.Funtowiczi and J. Ravetz. 2003.

However, contrary to Funtowicz and Ravetz's expectations, the softening of scientific rigour as advised by PNS failed either to 'democratise' scientific debates or to bring out into the open competing scientific perspectives. COMEAP itself were split on the task that they had been given by the government: to estimate the mortality risk created by air pollution exposure. A minority of the committee believed that stating mortality risk in terms of 'deaths' would 'mislead the public' into believing that science had identified a causal link between exposure and risk of death. The majority acknowledged the problem but argued that the estimate of mortality risk would still be useful, *'provided that the caveats and uncertainties are communicated clearly'*. A number of COMEAP did not believe that these caveats would be respected, leading to a significant part of the report discussing the controversy.

A fair view of the 'science' of air pollution and risk mortality ought therefore to start with recognition of that controversy and the uncertainty acknowledged by scientists, rather than to act as though 'cautions and caveats' had not been urged. Moreover, scientists themselves should be the community most concerned to challenge excessive and alarming statements made by politicians and political campaigners, rather than supporting them. Deeper inspection of the method devised by COMEAP's majority revealed that 'deaths' were indeed a 'statistical construct', not actual deaths, that the ERG did include in its report, but to minimal possible effect, ultimately admitting that '3,600 to 4,100 deaths' is 'equivalent' to '61,800 to 70,200 life years lost', but failing to explain that, according to the statistical method, this is a loss experienced by the entire population of some 8 million Londoners – a loss of between 67 and 76 hours of life per person per year. This context is of vital importance to evaluating policies that the statistics would otherwise seem to support.

Even after leaving aside the stark fact of a controversy at the centre of scientific understanding, and taking these hypothetical figures at face value, we argued that these statistics do not make the case for the Mayor's radical policies. History shows that life expectancy in the UK has been rising at a rate of approximately 73 days per person per year, and that this advance is greater in London than the national average. Moreover, we pointed out that at the level of London borough, household income is a far better predictor of healthy life expectancy than exposure to air pollution, as the following

charts from our Spring Report show. (In fact, air pollution appears to be positively correlated with air pollution exposure at the level of London borough, though this is not statistically significant.) Thus, air pollution policies run a very real risk of making policies worse for Londoners' health than the air pollution itself; and that therefore, at the very least, these consequences need to be the subject of debate and not met with the Mayor's – and some scientific institutions' – characteristic intransigence.



Figures 3 & 4. Our analysis showed that, at the level of London borough, air pollution is weakly correlated with longer life expectancy, though wealth is the far stronger predictor of health.

Business owners, tradesmen, and commuters dependent on private transport, who have found themselves on the receiving end of APPs, report significant loss of income. Given the very strong evidence demonstrating the relationship between income and health, the failure of air pollution researchers to put their claims into economic and social perspective suggests the strong possibility of their crossover from honest brokers into policy advocacy. Other parts of this report outline the economic and political pressure that may be factors that have introduced bias into scientific research organisations. Further discussion about the ideological nature of contemporary APPs, compared with

historical APPs, such as the abolition of lead in petrol and Clean Air Acts can be found in the section [Net Zero is ideological, not science-based.](#)

Whereas our Spring Report was more concerned with the technical claims around air pollution policies, this report makes broader arguments about the propagation of these ideas. Alarmist interpretations of weak science and overstating the potential benefits of APPs, cannot produce sound policy in the public interest, but seem to be sustained in debates about policy by money and power, and the prestige of institutional science, not through reason. Putting the public at the centre of policymaking requires not taking claims from academia and civil society at face value but subjecting them to the same scrutiny as any political tendency or financial interest. Recent history has given us a warning that no public institution is immune to ideology and that they cannot bear the weight of expectations that has hitherto been invested in them to provide sound guidance. Together believes that debate and democracy are the better guarantors of sound, genuinely independent policymaking than is faith in remote, unaccountable institutions, and that APPs have been designed and pushed up the political agenda without them. The rest of this report is an examination of how that has happened.

Finally, to conclude our reply to critics that our work is ‘anti-science’, we believe that we followed the scientific guidance precisely. We do not object to COMEAP’s 2018 report. COMEAP, despite perhaps some attempts to force experts to find a consensus, allowed a diversity of expert opinion on the evidence to be represented. The error that has followed COMEAP has been made by individuals and institutions that are more vulnerable to political consensus or ‘agency capture’ ignoring COMEAP’s guidance, to overstate scientific understanding of risks and benefits of APPs. Such political consensuses are as toxic to science as overdependence on technocratic panels of experts are to democracy.

7 Principal philanthropic foundations (billionaires)

- **A new model of philanthropy has developed as billionaires have amassed unprecedented fortunes, giving them extraordinary influence in global politics.**
- **Billionaire philanthropists are following this established model in the domain of climate politics.**
- **Green philanthropy dominates academic/scientific research and civil society.**

In this section, we examine some of the world’s most influential philanthropic grant makers and the organisations they support. The intention of this report is not to offer an exhaustive survey of philanthropy – which would be beyond our resources – but to demonstrate the facts of three levels of philanthropy. First, we show that philanthropy now plays a major role in shaping global and national politics by drawing on the example of the Bill and Melinda Gates Foundation (BMGF), whose main interests lie in healthcare and vaccination. Second, the model of political philanthropy epitomised by the BMGF has parallels in the relatively recent emergence of green philanthropists such as Michael Bloomberg, Sir Christopher Hohn, and Jeremy Grantham, who are among the most active in the climate domain. Third, a number of philanthropic foundations have emerged which are not at first appearances under the control of one philanthropist, but which are grantees of a number of philanthropic foundations, such as the ClimateWorks Foundation and the European Climate Foundation. This third category tend to have more focus on a particular issue, such as the Clean Air Fund, with its particular interest in APPs, and make their grants accordingly. The beneficiaries of these organisations are then discussed in the subsequent section.

7.1 The Bill and Melinda Gates Foundation

Since its inception at the end of the 1990s, the Bill and Melinda Gates Foundation (BMGF) has made more than 33,000 grants in total worth over \$82 billion [5]. More than a quarter of those donations (\$22 billion) has been made since 2018. But despite what appears at face value to be extraordinary generosity, Bill Gates is one of a number of philanthropists who have drawn fierce criticism, which has intensified over the course of the Covid 19 pandemic. This is owed largely to Gates's interest in public health and vaccination programmes, seemingly linking him to draconian policy interventions made during the Covid 19 pandemic, which overturned strongly held principles and longstanding rights, such as bodily autonomy and freedom of speech.

Though some criticisms against philanthropists exceed the available evidence, BMGF appears to have had involvement with attacks against individuals and movements that have spoken out against policies in the domains in which BMGF is interested, including substantial grants to media organisations and CSOs, and to organisations acting under the pretext of 'countering misinformation'. For example, BMGF made grants worth \$500,000 to the Institute for Strategic Dialogue (ISD), which has been active in both lobbying for 'online harms' legislation and in constructing false narratives that attempt to link criticism of covid and climate-related policies (including APPs) to the 'far right'. The ISD has close working relationships with the BBC (including BBC Media Action), which is also the beneficiary of nearly \$60 million of BMGF grants and reproduces its claims uncritically. This form of intervention is much harder to defend as 'philanthropy' in any conventional sense; controlling public discussion, especially discussion around unprecedented policy agendas, is manifestly political.

But philanthropists' good faith is often taken for granted, and their involvement in politics either directly or through CSOs is taken at face value in ways that would not be accepted in other policy domains or circumstances. MPs and Lords are required to declare the interests in a register, and to explain those interests where they may be relevant prior to contributing to debates on the floor of either house in Parliament, whereas philanthropists, who exert immense influence over policy debates, are neither seen as political nor as having interests. Yet it would be absurd to argue that billionaires do not have financial interests.

Criticisms of Gates are thus not without substance. Since 1999, BMFG has donated over \$4.7 billion to the World Health Organisation (WHO) and its offices -- \$3 billion of which was granted in the decade prior to 2023. Because the WHO has such influence over national policy, and is thus categorically *political*, many have asked whether philanthropic gestures of this kind – to an intergovernmental agency – can be taken at face value, and what conditions may be attached to such largesse. Whereas charitable giving is typically considered to be a one-way gift, some philanthropists seem keen to drive policy and shape research agendas, rather than take a hands-off approach to their grantees' projects. Given the far-reaching consequences of policies experimented with by intergovernmental agencies and national governments during the Covid 19 pandemic, as well as the extraordinary influence Gates indubitably has over many institutions of various kinds, criticism cannot be ignored. Why should a billionaire have *any* involvement with UN agencies of *any* kind? The problem is made worse because the UN is not a democratic organisation, and its agencies are wholly unaccountable to the world's population.

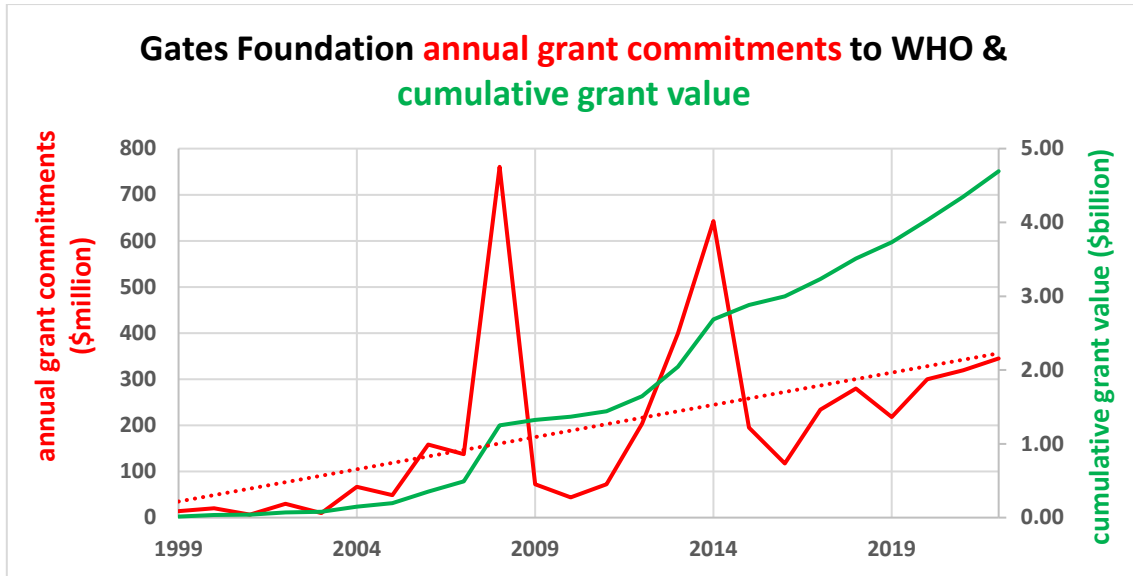


Figure 5. The Bill and Melinda Gates Foundation’s grants to the WHO since 1999.

Though BMFG’s interests lie mainly in public health and immunisation rather than environmental concerns, Gates has more recently and increasingly intervened in debates about energy and climate. And whereas BMFG is transparent about its grant making, Gates’s newer moves into environmental concerns are opaque, as discussed below. However, BMGF philanthropy is of interest to this report, not principally because of his interventions in environmental politics, or because there are important parallels in the domains of public health and the environment. Gates’s philanthropy is of importance to an understanding contemporary politics, and in particular to this report’s argument that public and scientific debates have been displaced from political decision-making by philanthropy’s dominance of civil society.

In addition to BMGF’s grants to the WHO, \$3.5 billion of grants have been made to organisations based in the UK, including grants worth over \$2 billion made to UK universities and research organisations, such as more than \$300 million each to the University of Oxford (\$329 million), London School of Hygiene and Tropical Medicine (\$327 million), and, of more significance to this report, Imperial College London (\$320 million).

Further significant grants were made to British civil society organisations, NGOs, and news media.

Selected think tanks/NGOs	Total grants (\$)	Media organisations	Total grants (\$)
MSI Reproductive Choices	78,902,104	BBC Media Action	54,343,594
Charity Projects	59,497,775	Guardian News & Media Ltd	12,229,391
ODI	34,792,626	The Daily Telegraph	5,881,248
International Institute for Environment and Development	32,812,100	British Broadcasting Corporation	3,668,657
International Planned Parenthood Worldwide, Inc.	30,531,912	The Bureau of Investigative Journalism	2,484,893
Tony Blair Institute for Global Change	24,243,585	Financial Times Ltd	2,360,345
Development Initiatives Poverty Research Ltd	23,363,936	The Thomson Media Foundation	860,628
Tony Blair Africa Governance Initiative	3,241,960	Storythings	799,536
Chatham House	3,117,790	The Spectator	96,600
Oxfam Great Britain	1,775,191	Evening Standard Ltd	20,000
Population Concern	912,000		
E3G	570,613		
Policy Exchange Ltd	215,000		
	293,976,592		82,744,892

Figures 6 & 7. Bill and Melinda Gates Foundation grants to selected UK-based civil society organisations and media organisations.

Many of these grants are worthy of comment, but this report cannot make space for them. However, criticism of just one makes the point that can be addressed to them all. BBC Media Action, formerly

known as the BBC World Service Trust, is a charitable arm of the broadcasting network, not funded by the UK's Television Licence fee, but through grants from governments and philanthropic foundations. The organisation's somewhat nebulous vision is 'A world where informed and empowered people live in healthy, resilient and inclusive communities', which it aims to achieve through 'creative communication and trusted media' [6]. Accordingly, the World Service has in recent years focussed its efforts on 'action against the production, consumption and sharing of false or misleading information' – a priority that has increasingly absorbed organisations that are dependent on philanthropic gestures [7].

But what is the BBC's claim to such objectivity? And is this claim not compromised by its dependence on an extremely wealthy individual's generosity? Moreover, is it not compromised by its dependence on organisations that are also dependent on the same individual's generosity? BMGF's grant-making is a vast enterprise. And yet it provokes very little discussion on what may be the consequences of alignment of so many seemingly 'independent' grantees – from global, intergovernmental agencies, through institutional science and academic research, and via countless civil society organisations, to state broadcasters' schedules – on which the rest of society may expect to be objective. That alignment is political, whether or not it is intended to be.

Though this report does not suggest that Gates's philanthropic grants have had direct influence on the development of APPs, BMGF's grant-making demonstrates a new political reality. BMGF has made grants to a number of organisations that are of interest to this report: the WHO, which sets air pollution guidelines; to Imperial College London and others that are involved in both the measurement of air pollution and estimating the risk that it creates; to extremely influential civil society organisations that have made interventions on air pollution policies; and to news media organisations, whose output has taken the form of campaigning journalism at best.

The problem of large philanthropic grants to intergovernmental agencies was understood long before the pandemic, however. In 2017, [The Public Health Movement](#), an NGO which assumes an observer role over the WHO and is 'committed to democratizing global health governance', published its [fifth Global Health Watch](#) report, which included a sharply critical analysis of the role of philanthropic funding of the WHO [8]. According to the report,

In late 2007 in a highly critical memorandum, head of WHO's malaria programme, Dr Arata Kochi, complained to Dr Margaret Chan, the director general of the WHO, that the Bill and Melinda Gates foundation's money, while crucial, could have "far-reaching, largely unintended consequences." He warned that the growing dominance of malaria research by the foundation risks stifling a diversity of views among scientists and wiping out the world health agency's policy-making function. Many of the world's leading malaria scientists are now "locked up in a 'cartel' with their own research funding being linked to those of others within the group," Dr. Kochi wrote. Because "each has a vested interest to safeguard the work of the others," he wrote, getting independent reviews of research proposals "is becoming increasingly difficult."

Dr. Kochi, called the Gates Foundation's decision-making "a closed internal process, and as far as can be seen, accountable to none other than itself." He argued, the foundation's determination to have its favoured research used to guide the health organization's recommendations "could have implicitly dangerous consequences on the policy-making process in world health".

Echoing these problems, though framing the WHO's insufficient budgeting as a consequence of nation states' failures, outgoing WHO Director-General, Margaret Chan, candidly revealed the nature of the WHO's vulnerability, as was documented by a filmmaker:

Only thirty per cent of my budget is predictable funds. [For the] other seventy per cent I have to take a hat and go around the world to beg for money. And when they give us the money, they are highly linked to their preferences – what they like. [9]

To much criticism, Chan's successor, Tedros Adhanom Ghebreyesus, was appointed in 2017. Tedros joined the WHO having served as a board member for the Global Alliance for Vaccines and Immunization (GAVI), a public-private alliance including governments, intergovernmental agencies, philanthropic foundations, vaccine manufacturers, which is one of the largest donors to the WHO, and which has received over a \$1 billion in grants from BMFG, amplifying Gate's influence.

Whether or not philanthropy is motivated by ideology or financial interest, grant making clearly goes far further than merely backing good causes such as the elimination of disease. It influences intergovernmental agencies and their guidance to national governments. It influences research organisations' research agendas and their advice to national government. It sustains a dominant position in civil society organisations that inform ministers of state and the public. And it aligns news media coverage to BMFG's interests.

It is this report's argument that other philanthropic foundations are following in this model of shaping policy through philanthropy epitomised, if not established, by Gates, with clear commitments to particular policy agendas.

7.2 Michael Bloomberg & Bloomberg Philanthropies

In his three terms as New York Mayor, Michael Bloomberg revealed that local politics is an open door to the wealthy and that opposition is easily overwhelmed. Having altered the City's constitution to allow him to run for a third term, Bloomberg used his own money to fund his campaign, outspending election rivals by multiples – 1,100 per cent in his 2009 campaign [10]. Winning with just 585,466 votes (in a city with a population of nearly 8 million), but with a campaign spend of \$109.2 million, each vote cost the billionaire \$186.50. His 2002-2013 tenure was characteristically authoritarian, seeking bans on smoking, trans-fats, and large sizes of sugary drinks, and favouring aggressive policing strategies such as stop-and-frisk [11].

Bloomberg's interest in climate developed in his final term. The first significant grants by Bloomberg Philanthropies, also known as The Bloomberg Family Foundation Inc. (BFF) to environmental causes were made in 2011 – \$6.5 million to the World Resources Institute and \$15 million to the Sierra Club, launching his personal crusade against coal. According to the BFF's 990 form filings, grants worth nearly \$42 million were made in 2008, but grew in line with Bloomberg's fortune, rising to an extraordinary \$1.6 billion in 2019, though total grants in the following year were more modest: \$497 million in 2020 and just over \$1 billion in 2021, which included \$202 million of climate-related grants. Bloomberg has recently committed \$500 million to campaign to have all American coal plants closed, largely through litigation and supporting CSOs [12].

Since 2011, Bloomberg's personal wealth, global profile, and philanthropic interests in climate have increased significantly. Following his mayorship, UN Secretary General Ban Ki-moon made Bloomberg Special Envoy for Cities and Climate Change in 2014 [13]. This role was renewed by Ki-moon's

successor, António Guterres, who appointed Bloomberg as Special Envoy for Climate Action in 2018 [14], and again in 2021 as Special Envoy on Climate Ambition and Solutions [15], following Bloomberg temporarily stepping down from the role while running his bid for Democratic presidential candidate in the 2020 election.

Bloomberg was also appointed in 2015 by then Governor of the Bank of England, Mark Carney to chair the Task Force on Climate-Related Financial Disclosure (TCFD) – an organisation established by the G20's Financial Stability Board (FSB) to create recommendations for Central Banks and financial regulators, towards making the financial sector responsible for its share of CO2 emissions [16]. This includes disclosing climate-related 'liabilities' such as stakes in hydrocarbon energy companies – thereby putting the 'E' in ESG, and essentially restricting capital investment in many areas of business that are not Net Zero compliant. In essence, this is climate policymaking by the back door. It uses the financial system to increase the costs of noncompliance with Net Zero objectives, without having to have those policies on the statute books. It is for this reason that a [Bloomberg Intelligence analyst](#) attributed rising energy prices to ESG lobbying in November 2021, stating that,

Oil companies are finding it increasingly difficult to raise financing amid rising ESG and sustainability concerns, while banks are under pressure from their own investors to reduce or eliminate fossil fuel financing. [17]

Put simply, by increasing the cost of capital and forcing the misallocation of investment funds, green lobbying has significantly contributed to the energy crisis, rising prices and the inflation seen since the end of the Covid 19 lockdowns – though the lockdowns themselves and the money printing are significant amplifiers of the problem. Until the Glasgow COP26 November 2021 meeting, the green movement had celebrated these price rises, since they had made renewable energy seem much cheaper by comparison [18]. In the FT, Indian economist Amrita Sen argued to 'Embrace high fossil fuel prices because they are here to stay', and that this was necessary 'to help curb demand making the transition to a cleaner world easier' [19]. But inflation soon overtook green hubris, and in early 2022, commentary began to attribute inflation to Russia's invasion of Ukraine.

According to BFF's 990s forms, a number of organisations are funded by BFF to feed into the TCFD's work. In 2021, grants worth \$6.3 million were made to ten organisations, each 'to support Task Force on Climate-Related Financial Disclosures Initiative'. In other words, Bloomberg has funded organisations to lobby both the organisation that he had been appointed to chair, and the financial institutions and central bank regulators that are to adopt its recommendations.

Mark Carney was appointed Special Envoy on Climate Action and Finance by Guterres in 2019 [20], and then, following his Bank of England governorship, was made Climate Finance Advisor for COP26 in 2020 by then Prime Minister Boris Johnson, to 'help the UK Government to mobilise ambitious action from across the financial system' – a key theme of the COP26 meeting [21]. Carney then convened The Glasgow Financial Alliance for Net Zero (GFANZ), which he co-chairs with Bloomberg [22], and which also reports to the FSB. At the COP26 meeting, then Chancellor of the Exchequer, now UK Prime Minister, Rishi Sunak, announced that financial institutions with assets under management totalling \$130 trillion had been brought into the Alliance [23]. In August 2023, Carney was appointed chairman of the board of Bloomberg [24].

Despite a very obviously cosy relationship between the world's seventh richest man and the governor of the Bank of England, none of the appointments described above have been scrutinised in depth by any mainstream UK or global news media organisation. Bloomberg has apparently not been asked to declare his interests nor to stand for election. Bloomberg is at least implicated in both

the global energy price crisis and what is arguably the Bank of England's failures, which have caused immense hardship for millions of people. Yet if he had interests in fossil fuel companies, there would have surely been endless allegations of corruption. Instead, the many CSOs and other bodies that he funds and controls continue to influence policies.

Bloomberg is cited as having given more than \$11 billion through his philanthropic foundation. The foundation's 990 form filings (accounts submitted to the US regulator) show donations worth \$119 million to BFF from the BMGF, and joint projects between the two foundations, with most funds directed to the WHO. Total grants from BFF to the WHO were worth \$114 million.

Though Michael Bloomberg has given away in philanthropic grants an amount that to any ordinary person is an extraordinary sum, it just a small fraction of his vast total net worth, estimated to be \$95 billion in mid-2023 – a figure that has nearly doubled since 2018 [25]. He was easily able to buy his way into politics, by entering the mayoral race of a global city, in which a vast majority had disengaged from democratic politics. From there, Bloomberg used his money and his political position to align or control global and national CSOs and to obtain positions close the Secretary General of the United Nations and the Governor of the Bank of England, giving him proximity to and influence in policymaking in national governments and intergovernmental agencies.

7.3 Christopher Hohn and The Children's Investment Fund Foundation

A quieter and somewhat less wealthy philanthropist than Gates and Bloomberg, but who is no less involved in supporting environmental CSOs, is British hedge fund billionaire Sir Christopher Hohn. Hohn's investment firm, The Children's Investment Fund (TCI), former employer of now UK Prime Minister Rishi Sunak, became infamous in the 2000s for Hohn's reckless shareholder activism that triggered the 2007 Royal Bank of Scotland failure, which left the taxpayer facing the £45 billion bailout bill [26]. Though RBS CEO, Sir Fred Goodwin lost his knighthood over the affair, Christopher Hohn gained his shortly afterwards, for his 'services to philanthropy' – using some of the money he had made during the scandal for seemingly 'charitable' purposes [27]. This somewhat exposes the reality of billionaire philanthropists' giving to 'good causes'. Between 2013 and 2021 (inc.), Hohn's philanthropic arm, The Children's Investment Fund Foundation (CIFF) has made grants to climate change organisations worth over \$783 million. However, this rate of giving has increased substantially, rising from \$32 million in 2013 to \$201 million in 2021, reflecting the growth of his hedge fund and personal wealth.

CIFF is a major funder of the European Climate Foundation (ECF) (discussed below) – a major pass-through grant-making philanthropic foundation that supports climate campaigning and lobbying organisations, but whose income and grant making are both opaque. CIFF made grants of \$128 million to ECF in the period 2013-21 (inclusive). Over the same period, CIFF made grants of nearly \$57 million to C40 Cities, making Hohn the largest of C40's three strategic funders.

According to CIFF's website, it currently has \$1.7 billion of 'Current multi-year grant commitments' to organisations, \$809 million of which are active in the climate change domain, and \$76 million of which is designated to 'air quality' [28]. Of that, \$21.4 million is a grant to the Clean Air Fund (discussed below).

In 2023, investigations by The Telegraph revealed that Sadiq Khan's Deputy Mayor for Environment and Energy, Shirley Rodrigues had attempted to intervene in the publication of scientific research that showed no health benefits to London's APPs [29]. A second investigation showed Rodrigues

seemingly in collusion with Professor Frank Kelly of Imperial College’s Environmental Research Group (ERG), discussing ways to ‘silence’ research that had not shown the Mayor’s policies in a positive light [30]. Kelly, perhaps one the most significant air pollution scientists in the country, was shown expressing his willingness to support the Mayor’s policy and taking suggestions from Rodrigues on the wording and content of his statements to the press, and her arranging ‘friendly’ news media interviews for him. What was not understood at the time, however, was that Rodrigues had come to the Mayor’s office via CIFF, having had roles as CIFF’s Climate Change Portfolio Manager, then Director of Climate Change, and finally Acting Executive Director of Climate Change, overseeing grants worth over £155 million [31].

This is far from the full extent of CIFF’s relationship with City Hall. Ben Goldsmith, brother of Zac Goldsmith, who was Sadiq Khan’s 2016 Mayoral contest rival, is a CIFF Trustee [32]. Rodrigues’ declaration of ‘gifts and hospitality’ demonstrates the continued working relationship between the Mayor’s offices and CIFF and CIFF grantees [33]. In 2018, CIFF was the major funding partner of a joint venture between CIFF, C40 Cities, the ERG at Imperial, and the GLA (the mayor’s office) [34]. Consequently, CIFF grants between 2016 and 2019 amounted to \$3.6 million.

7.4 The Grantham Foundation for the Protection of the Environment

The Grantham Foundation for the Protection of the Environment (GFPE) and The Jeremy and Hannelore Grantham Environmental Trust are grant-making philanthropic foundations of investment fund manager Jeremy Grantham. Grantham is the eponymous major funder of The Grantham Institute – Climate Change and the Environment at Imperial College, and The Grantham Research Institute on Climate Change and the Environment at the London School of Economics. Both institutes are extremely active in policymaking.

The LSE institute is chaired by Lord Nicholas Stern, author of the 2006 Stern Review on the Economics of Climate Change, which sets the framework for UK climate policy [35]. Stern also chairs the LSE-based Centre for Climate Change Economics and Policy (CCCEP), which was established by the UK public grant making body, the Economic and Social Research Council (ESRC), to provide research for the UK Committee on Climate Change (CCC), while the ESRC was chaired by Adair Turner, who later went on to chair the CCC itself. The CCCEP and the Grantham Institute therefore share many members and are considered the public and private wings of the same organisation.

The following table shows GF’s most significant grants. Grants from both foundations totalled \$57 million in 2021, and \$287 million between 2013 and 2021 (inclusive).

Grants per year (\$)	Climateworks Foundation	Environmental Defense Fund	Imperial College	London School of Economics	European Climate Foundation
2007			1,924,000		
2008		450,000	610,950	1,256,785	
2009		1,500,500	1,433,300	1,488,490	
2010	800,000	1,666,667	1,786,840	2,179,427	
2011	800,000	2,120,000	1,947,253	2,217,915	
2012	800,000	2,000,000	2,088,108	2,060,420	
2013	1,200,000	2,000,000	2,177,745	2,116,099	
2014	700,000	1,100,000	2,812,483	2,271,096	
2015	750,000	2,500,000	2,315,637	2,105,491	
2016		1,500,000	2,284,672	3,063,440	1,123,329
2017		1,806,666	2,015,500	2,266,183	2,750,000
2018	450,000	1,353,000	2,217,976	2,347,330	3,000,000
2019	25,000	1,500,000	2,163,654	2,426,783	900,000
2020	35,000	1,500,000	4,242,349	4,718,473	900,000
2021	1,425,000	1,200,000			900,000
Total	6,985,000	22,196,833	30,020,467	30,517,932	9,573,329

Figure 8. Grantham Foundation for the Protection of the Environment grants to selected grantees.

8 Strategic and ‘pass-through’ philanthropic foundations

- A number of strategic grant-making organisations have been established, with greater focus on particular political objectives than philanthropic foundations typically achieve.
- These foundations can be found working in close proximity to policymakers, and in drafting, lobbying and campaigning for policies.
- The grants made to and from these organisations are opaque, despite their clearly political objectives and influence in policymaking.

8.1 The European Climate Foundation and ClimateWorks

The European Climate Foundation (ECF) was founded in 2008 as a regional branch of the US-based ClimateWorks Foundation (CWF). CWF is an extremely well-funded philanthropic grant-making organisation that had income of \$366 million in 2021 [36]. In 2010, CW’s Annual Report discussed the creation of the ECF and the success that CWF and ECF’s founders had in lobbying European bureaucracies:

As E.U. leaders grappled with their newly defined climate objectives, the European Climate Foundation (ECF) — part of the ClimateWorks Network — was mulling a parallel project to identify rigorous, pan-European emissions reduction targets. Michael Hogan, then director of ECF’s power program, stopped in Brussels to meet with Christopher Jones, then a unit head at the Directorate-General for Energy at the European Commission. Jones was unsure how to comply with the new mandate to slash emissions.

[...]

So when Hogan told Jones that ECF might be able to help, “You could see the wheels turning,” Hogan says. ECF had already established itself as an analytical, nonpolitical organization with independent funding and a reputation for objective, high-quality work. Jones asked whether ECF would be willing to take on the enormous analytical task of charting a pathway to full decarbonization — not with E.U. sponsorship, but independently. “I got on the train back to The Hague and called Jules Kortenhorst, who was then CEO of ECF,” Hogan says. “I told him, ‘You cannot believe the opportunity that has been dropped in our lap.’ Jules immediately recognized the opportunity and the amount of resources it would require.” The ECF board agreed, and the Roadmap 2050 project was born.

The report thus describes a longstanding and extremely cosy and undemocratic relationship between CSOs and policymakers. ECF’s lobbying for the closure of coal plants across the continent, and now a ‘roadmap’ for four decades of policy framework had been drafted, not by civil servants engaged by democratic representatives, but by lobbyists working for the world’s wealthiest people, echoing both Gates’ influence at the WHO and Bloomberg’s influence at the UN and central banks. This epitomises European and British environmental policymaking, in which the public’s views on the far-reaching policies that will be imposed on them are rarely a consideration for technocrats, CSOs and politicians.

ECF, now mostly independent of CWF, is a secretive organisation that does not reveal an exhaustive list of its grantors or grantees. However, a cached copy of its 2021 internal auditor’s report was left on Google. From this, it was possible to find out the main sources of its funding. Here are ECF’s ten largest grantors for the year 2020.

Grantor to ECF	Amount (Euros)	
	2020	2019
Anonymous	36,102,621	9,376,180
Children's Investment Fund Foundation	33,788,482	14,927,708
The William and Flora Hewlett Foundation	13,018,918	12,274,408
Bloomberg Philanthropies	11,304,571	11,853,323
Ikea Foundation	10,384,196	7,163,353
Oak Foundation	3,019,994	5,833,837
Open Society Foundations	2,557,329	--
Tilia Foundation	2,106,939	1,917,094
High Tide	1,856,436	2,455,880
Packard Foundation	1,387,086	1,012,047
Total	115,526,572	66,813,830

Figure 9. The ten biggest grantors to the European Climate Foundation.

The auditor’s report states that, ‘the identities of these two {anonymous} funders are known to the Supervisory Board, key staff members, and the CEO’. But the problem for the ECF is that transparency is a key principle on which its own grantees, such as the Guardian, argue for the exclusion of critics of climate policy, and it is the public who do not know who funds the ECF, nor who the ECF funds. Such ‘dark money’ would keep an organisation such as the Global Warming Policy Foundation – a central character in the British green movement’s demonology – afloat for over a century, if not indefinitely, were it invested.

The ECF funds a number of organisations that campaign for transparency in environmental policy lobbying. One such grantee, InfluenceMap, published a report in 2018, claiming to have identified approximately \$200 million a year being spent by the world’s five largest hydrocarbon energy companies, including ExxonMobil, ‘on narrative capture and lobbying on climate’, which has been widely cited as evidence of ‘climate denial’ [37] and ‘lobbying designed to control, delay or block binding climate-motivated policy’ [38] [39]. However, a deeper inspection of InfluenceMap’s claims (by this report’s author) reveals that they are not based on evidence as much as speculation and estimation, and even include in their estimate pro-climate policy advocacy, such as emissions reduction targets, Net Zero and carbon taxes [40]. Moreover, when the total spend of InfluenceMap’s eleven funders was calculated, they were found to have collectively spent more than six times that amount -- \$1.2 billion – on funding climate change campaigning and lobbying. Many of these philanthropic foundations, especially those based in the EU and UK, do not make clear who they fund, or for what purpose.

In 2021, The Guardian ran a series of adverts claiming that the newspaper was ‘not funded by billionaires’, and that, ‘our readers’ backing gives us the independence to hold the powerful to account’. But The Guardian admitted elsewhere to be backed, in fact, by a number of powerful philanthropic foundations, including the ECF, as well as Open Society Foundations, the Rockefeller Family Fund and more. Since then, it has emerged that BMGF made grants of more than \$12 million to The Guardian – equivalent to \$116 per reader of the print version of the newspaper, according to the more recent published figures (The Guardian no longer shares its circulation data) [41]. Though The Guardian has run many articles denouncing the lack of transparency around the funding of right-of-centre CSOs and the influence of ‘dark money’, neither The Guardian nor many of its backers, such as the ECF, publish detail on their own funding relationships [42].



Figure 10. Misleading Guardian advertising campaign.

8.2 Clean Air Fund

The Clean Air Fund (CAF) is another pass-through philanthropic fund and appears to be the only funder dedicated to supporting air pollution campaigning organisations in the UK. It does not reveal who its grantors are, but it does publish details about its grantees. CIFF is the major funder, having made a grant of \$21.4 million to CAF. In the years 2019-22 (inc.) CAF has made grants of \$30.5 million, so it can be assumed that CAF is principally a CIFF vehicle and has not raised significant funds from other sources. Of those funds, a total of \$5.2 million were granted to organisations in the UK.

CAF’s website proudly states its involvement in policymaking:

In the UK, we drove the creation or expansion of eight Clean Air Zones (CAZ) in Bath, Brighton, Portsmouth and the London Ultra Low Emission Zone – with the potential to save millions of lives. [43]

The biggest grant from CAF was to Environmental Defense Fund Europe (EDF). EDF was one of the founding partners of the Breathe London campaign (discussed below) [44]. EDF has received grants worth \$1 million from CIFF and EDF Europe’s parent, the US-based NGO of the same name, has received over \$11 million in grants from Bloomberg Philanthropies. Over the years 2016-22(inclusive), EDF received grants worth just under \$20 million, including \$16 million from its US parent. According to Companies House data, the CEO of EDF UK is Ravi Gurumurthy [45], who previously worked for now defunct UK Government Department for Energy and Climate Change and the Foreign Office, and is currently also CEO of UK state-controlled green innovation investment ‘charity’, NESTA and The Behavioural Insights Team, also known as the ‘Nudge Unit’ that provides policymakers with insights from psychology for government messaging [46] and, according to its critics, sinister interventions that break with the norms of liberal, democratic society [47].

Together Association & Climate Debate UK

Organisation	Region	\$2019	\$2020	\$2021	\$2022	TOTAL
Asthma and Lung UK	UK	--	--	267,854	168,031	435,885
Asthma UK and British Lung Foundation Partnership	UK	--	60,993	--	--	60,993
BMJ Publishing Group Ltd	UK	--	18,721	--	--	18,721
Centre for Policy Studies	UK	--	--	--	91,157	91,157
Conservative Environment Network	UK	--	52,222	56,715	51,166	160,103
CWC Environmental	UK	--	49,329	--	--	49,329
Ella Roberta Family Foundation	UK	--	--	183,999	181,346	365,345
Environmental Defense Fund Europe	UK	1,106,064	404,709	--	--	1,510,773
European Climate Foundation	UK	550,000	--	--	--	550,000
Global Action Plan	UK	--	22,933	--	--	22,933
Greater London Authority	UK	34,897	--	--	--	34,897
Guy's and St Thomas' Foundation	UK	--	409,470	322,128	--	731,598
IEMA – Broadway Initiative	UK	--	40,630	--	--	40,630
Institute for Public Policy Research	UK	--	--	--	50,979	50,979
Purpose Foundation	UK	166,000	--	--	--	166,000
Transport & Environment	UK	--	--	--	195,265	195,265
UK Community Foundation	UK	--	--	--	303,231	303,231
UK100 Cities Network Limited	UK	--	65,207	96,893	--	162,100
University of Birmingham	UK	--	--	--	283,163	283,163
TOTAL		1,856,961	1,124,214	927,589	1,324,338	5,233,102

Figure 11. Grants from Clean Air Fund to UK organisations.

Significant grants (£160,000) were made from CAF to the Conservative Environment Network (CEN) – a Westminster lobbying group of MPs, founded and chaired by Ben Goldsmith, who is a ClIFF trustee [48]. (CEN is also funded by the ClIFF grantee, ECF). CEN's website claims that 'Over 150 MPs and peers are members of CEN's Parliamentary Caucus', and 'Over 500 councillors are members of CEN's Councillor Network'. This makes the \$550,000 donation from CAF to ECF somewhat odd, since both are substantially funded by ClIFF. With approximately a third of Conservative MPs apparently signed up to CEN's pledge, the government's ability to use its Parliamentary majority may be significantly reduced if it runs counter to the Network's briefings [49].

A grant of \$91,157 was made to nominally Conservative-aligned think tank, the Centre for Policy Studies (CPS). This appears to be a fee for a 2022 report produced by the CPS called The Future of Driving, which made the case for road-use charging to address the problems of 'congestion, poor air quality, and taxation' [50]. The more left-leaning Institute for Public Policy Research was also a grantee (\$50,979), though the purpose of this grant has not been identified.

Transport and Environment is a European political lobbying campaign for 'clean transport'. Its 2021 entry in the EU transparency register shows that it received more than €3 million from ECF [51]. Its own web pages show that it has also received grants worth between €250,000 and €500,000 from both Bill Gates's Breakthrough Energy Foundation and the ClimateWorks Foundation [52].

9 Grantees: Civil Society Organisations and Academia

- **Many civil society organisations (CSOs) in the climate and air pollution domains are wholly dependent on, and were founded by, philanthropic foundations, ‘to order’.**
- **CSOs and academic organisations receive vastly greater budgets from philanthropy than the public can raise for genuinely independent campaigning and research.**
- **Though CSOs claim to be ‘independent’ and take the form of charities, closer inspection reveals them to be aligned to philanthropic foundations’ interests, and politically-motivated.**

9.1 C40 Cities

C40 Cities (also known as C40 Cities Climate Leadership Group) claims to be ‘*a global network of mayors of the world’s leading cities that are united in action to confront the climate crisis*’. It was founded initially as C20 in 2005, out of a meeting convened by then London Mayor, Ken Livingstone, with the involvement of the Clinton Climate Initiative, but has in more recent years grown to include ninety-six large cities throughout the world, though London is the only UK member. As is discussed in the section, [The air pollution issue is a proxy battle of the climate war](#), this emphasis on cities and mayors reflected a growing frustration with the seemingly glacial pace and constraints of global and national policymaking. Mayors of large cities could use their power to enact policies without waiting for a global climate agreement. Michael Bloomberg was chair of C40 Cities from 2010 to 2013. In December 2021, London Mayor, Sadiq Khan was appointed to chair the organisation [53].

Following Bloomberg’s term as C40 chair, BFF began donating significant amounts to the group, and was made president of C40’s board, where he remains. Between 2013 and 2021, Bloomberg made grants of approximately \$45 million to the organisation, making him the second largest donor after CIFF, which made \$57 million of grants over the same time. This makes CIFF and BFF two of C40’s three ‘strategic funders’, a third being Danish philanthropic foundation Realdania, with a relatively small contribution of 50 million kroner (approximately \$7 million) [54]. Major funders also include UK, German, and Danish governments, Arup, CAF, ECF and CWF, and other large business interests’ philanthropic vehicles and their grantees. In its 2022 Annual Report, C40 reports \$56.4 million of income, though does not explain how much it received from each grantor.

The logic driving cities’ membership of C40 is that the population of that city comes to be represented by C40 [55]. Thus, C40 claims ‘*to represent over 582 million people from diverse global contexts and around one-fifth of the global economy*’. But it seems extremely unlikely that very many of London’s 8 million population, for example, have even heard of C40 Cities let alone know that their mayor is its chair, and less still have agreed to its radical visions for the reorganisation of their lives, and the mayor’s assumptions of powers to carry out such an agenda. And the C40 agenda is radical. A 2019 report produced for C40 Cities by Arup and the University of Leeds urged mayors to:

‘exert influence over global emission reductions by promoting changes in the production and consumption of food, buildings and infrastructure, private transport, aviation, clothing and textiles, and electronics and household appliances’. [56]







Consumption category	Consumption interventions	Emission reductions per consumption category between 2017 and 2030	Emission reductions per consumption category between 2017 and 2050
	<ul style="list-style-type: none"> - Reduce the number of new clothing items bought every year - Reduce supply chain waste 	39% (Reducing the number of new clothing items alone accounts for 37%)	66% (Reducing the number of new clothing items alone accounts for 64%)
	<ul style="list-style-type: none"> - Dietary change: eat in line with health recommendations and lower meat and dairy consumption - Reduce household waste - Reduce supply chain waste 	36% (Dietary change alone accounts for 27%)	60% (Dietary change alone accounts for 45%)
	<ul style="list-style-type: none"> - Reduce number of flights - Increase adoption of sustainable aviation fuel 	26% (Reducing number of flights alone accounts for 18%)	55% (Reducing number of flights alone accounts for 31%)
	<ul style="list-style-type: none"> - Improve materials efficiency - Enhance building utilisation - Switch to lower carbon materials - Adopt low-carbon cement - Reuse building components 	26% (Improving materials efficiency and enhance building utilisation together account for 18%)	44% (Improving materials efficiency and enhance building utilisation together account for 29%)
	<ul style="list-style-type: none"> - Reduce car ownership - Increase car lifespans - Increase material efficiency 	28% (Reducing car ownership alone accounts for 24%)	39% (Reducing car ownership alone accounts for 31%)
	<ul style="list-style-type: none"> - Optimise lifetimes of IT equipment 	18%	33%

Figure 12. Graphic from a C40 Cities analysis of CO2 emissions-reduction policy interventions that could be made at the level of local government.

Further discussion about whether these, and other of C40’s ambitions exceed mayors’ democratic mandates is discussed in the section, [The air pollution issue is a proxy battle of the climate war.](#)

C40 Cities is an opaque organisation, which allows the strategic coordination of a clearly political agenda. It brings together mayors with business interests, philanthropic foundations, CSOs and academics to discuss policy ideas. And it allows that coordinated effort to focus collective resources – including those of national and local governments – towards both strategic and policy objectives. But it does not include the populations of the cities that those mayors seemingly represent. And those policy agendas are not subject to democratic scrutiny or discussion.

For example, C40 Cities explains that it ‘provide[s] cities with technical assistance, collaboration opportunities, and the tools required to implement and scale up solutions that improve air quality and reduce emissions’. This includes, ‘Expanding adequate city-wide air quality monitoring’, and ‘Implementing policies and programmes to reduce local air pollution emission sources from the residential, transport, or industrial sectors’ [57].

But while these are seemingly noble aims, they require more of local populations than those people may be willing or able to give. Many criticisms of APPs, including ULEZ, report that consultations that receive overwhelmingly negative feedback have simply been ignored. According to a Telegraph article from early 2023, Khan’s office excluded a large number of objections to a consultation on ULEZ expansion:

A total of 47,502 responses were included in the published results – 27,237 of which opposed expansion, 18,733 of which supported and 532 “don’t knows”.

However, emails obtained under Freedom of Information laws reveal that 5,273 votes were excluded: some 5,270 from motoring group FairFuelUK and three votes from a support lobby group called Living Streets.[58]

Crispin Blunt, the Conservative Party MP for Reigate – a constituency just outside the ULEZ expansion zone, whose residents were likely to be affected by it – argued that *‘This intervention lowered the level of opposition in the final count by 3 percentage points (from 62% to 59%)’* [59]. Furthermore, the mayor had spent £165,000 on a digital marketing campaign in an attempt to promote pro-ULEZ responses. This was arguably an improper use of public money and must be seen furthermore in the context of the resources available to the \$56 million a year C40 Cities organisation, and the CSOs which are involved in the same network of grantees of C40’s grantors.

It is unlikely that a mayor such as Sadiq Khan succumbed to pressure from C40 Cities to align his agenda to theirs. However, a global organisation with such resources and connections may well be more persuasive than the electorate of a city in which no more than 45 per cent of people have ever voted for any mayoral candidate.

9.2 UK100

The UK100 Cities Network is modelled on C40 Cities and the Global Covenant of Mayors but is open to local councils in the UK. Similar to C40, the project claims ‘to foster collaboration’ and to ‘facilitate knowledge-sharing between members, partnership-building and provide leadership and outreach mentoring’. An earlier version of UK100 website sheds light on the organisation’s origins...

*Incubated by Purpose Climate Lab and led by Polly Billington, former Special Adviser in the Department of Energy and Climate Change, UK100 has support from across the political spectrum. We have financial support from the **Children’s Investment Fund Foundation, the European Climate Foundation, Siemens, Marks & Spencer and LandSec.** [60]*

Membership of UK100 requires local authorities to sign a pledge, including the statement that, *‘We will continue to lead the UK’s response to climate change, acting sooner than the government’s goal by making substantial progress within the next decade to deliver Net Zero’* [61]. And again, as with other pledges, UK100 offer no thoughts on whether or not the populations of the administrations signing this pledge have given their assent to it. This makes a problem for UK100’s claim to be *‘a network of local leaders who have pledged to lead a rapid transition to Net Zero with Clean Air in their communities ahead of the government’s legal target’* – because ‘local leaders’ may well have got just as far ahead of their democratic mandate.

A now deleted UK100 web page in 2019 asked supporters to pledge their support for their clean air declaration that included a demand that the government,

Require, and provide necessary resources for, the meeting of world leading World Health Organization air pollution standards, as a minimum, in the Environment Bill that will eliminate pollution from controllable sources.

Establish a programme that provides financial support for the poorest in our society and for small businesses to switch to cleaner vehicles, shared transport or active travel via schemes such as mobility credits, and also includes a £1.5bn Fleet Renewal Programme, stimulating the market to deliver cleaner vehicles, including heavy freight, municipal vehicles and for retrofit solutions.

Grant Local Authorities and Mayors the powers and funding they need to deliver zero emission transport networks, encourage and enable behaviour change, including the

promotion of active travel, and tackle non-road transport sources of pollution including: public transport, infrastructure, construction, planning and enforcement.

Create certainty for business and local government by setting out an ambitious roadmap to 2030 as part of a strengthened UK Government Clean Air Strategy that empowers business, local authorities and public bodies to collaborate with confidence and put in place the necessary actions needed for clean air. [62]

A 2020 investigation into the rapid rollout of APPs during the lockdown by David Rose in the Daily Mail revealed that UK100 'currently has one of its staff seconded to Bristol City Council' – a council which was notable for its particularly aggressive anti-car policies [63]. UK100's influence can be detected behind every local authority's experiments with APPs. In 2020, UK100 published an article (now removed) by Oxford City Council Cabinet member, Tom Hayes, who spoke about how 'Oxford is campaigning for new money and powers from Government but also refusing to wait indefinitely for national change' and the Council's ambition 'to introduce the world's first Zero Emission Zone into our city centre' [64].

The problem for Hayes' demands for more money and power to advance his radical vision, however, is that even in his own election to office, just a third of the electorate turned up to vote 65. Worse, Oxford and Oxfordshire Councils' green ambition has sparked immense controversy locally, suggesting that even if Hayes had such power, he would be unwise to use it. And even worse, the controversy soon began to draw global attention to the Councils' plans for 'fifteen-minute cities'. UK100 subsequently withdrew Hayes' article, and began trying to distance themselves from the controversy, claiming that 'UK100 does not mandate its members to introduce 15-minute neighbourhoods' [66].

UK100 does not reveal any details about its funders or its finances. Despite this opacity, it is active in over a hundred councils, including counties and cities, London boroughs, and districts. A recent job advertisement for a grants fundraising manager for a pro-rata salary of £40,000 reveals that UK100 is already very well-funded:

We are supporting UK100 in their search for an ambitious and passionate part-time Grants Fundraising Manager to lead on managing their relationships with significant grant funders and drive impactful new business opportunities for the charity. This is a pivotal role within the organisation and will give you the opportunity to work on 6 and 7-figure partnerships with funders such as Quadrature Climate Foundation and Ikea Foundation. [67]

9.3 The Ella Roberta Family Foundation

As we discuss in our 2023 air pollution crisis report, following the tragic death of nine-year old Ella Roberta Adoo-Kissi-Debrah, extremely well-funded climate campaigning organisations lobbied with her family to have the coroner's initial finding overturned.

A new verdict in 2020 found that air pollution had been 'a significant contributory factor to both the induction and exacerbations of her asthma', and that levels of air pollution that exceeded permissible limits had 'possibly contributed to her death'. The coroner made a statutory Report to Prevent Future Deaths, which stated that 'There was no dispute at the inquest that atmospheric air pollution is the cause of many thousand premature deaths every year in the UK', and that 'evidence at the inquest was that there is no safe level for Particulate Matter and that the WHO guidelines should be seen as minimum requirements'.

However, as we highlight in our report, that scientific guidance is misleading, and organisations that requested to give evidence to the inquest were not permitted to do so on the basis that they were not an ‘interested party’ [68].

In 2020, CIFF made a grant worth \$1,080,000 to ECF to ‘fund the legal costs - and associated supporting costs - for the family of Ella Adoo-Kissi-Debrah to cover the fresh inquest into her death’ [69]. The Ella Roberta Family Foundation was granted a further \$365,345 by CIFF-controlled CAF.

We cannot fault the family for seeking justice for their child. However, and as is the with many, if not all of the organisations surveyed by this report, and the many that are not included here, the question must be asked if they would exist at all were it not for both the financial support given to them to promote the highly ideological view of the environment that they attempt to create in the wider population. That ideological view is one that we argue ultimately prevents a rational, science-based, and democratic discussion about both air pollution and health, and the best way of ensuring that vulnerable people, and children especially, are given what they need.

Ella Adoo-Kissi-Debrah’s death has become a grim symbol of much of APP campaigning. We believe that such interventions and the exploitation of a family’s private tragedy are deeply distasteful, unscientific, anti-democratic and cynical. The basis for far-reaching policies should not be decided in inquests, surrounded by such money and emotion. It would be just as distasteful for anti-APP campaigners to use a \$1 million budget – if they had any hope of finding a billionaire to make such a grant – to seek to overturn the second inquest’s finding.

We believe that the coroner’s advice has misled policymakers and the public about the nature of the inquest. Furthermore, the details of the inquest itself, including the evidence submitted, are not available for examination. An unfortunate development in APP campaigning has been clinicians using their professional status as leverage, in the hope of using death certificates as data to drive policymaking. For example, a recent article published in the BMJ argued that:

Death certificates serve multiple purposes: they explain the cause of death to the family, allow them to register the death, and are a public record accessed by researchers, lawyers, and national bodies. It is important that a major source of preventable death should appear in our national statistics as this underpins decision making. Death certification is a key way in which data on cause of death are collected. A death is often the consequence of multiple short and long term causes, so writing a death certificate is dependent on the doctor’s clinical judgment. Government advice is provided on the inclusion of smoking, alcohol, and occupational exposures, but not on when to include air pollution. [70]

However, the three authors of the opinion were affiliated to green campaigning organisations. And the problem, described above and in our Spring Report, that it is almost impossible for science to establish a causal link between air pollution exposure and mortality risk remains, even at the level of the general population, whereas excessive drinking and smoking are comparatively easy to identify as likely contributory factors to individuals’ deaths. The phenomenon of doctors-as-activists, like lawyers, reveals that the professions are willing to lower the standards that mark them as professionals.

9.4 The Global Covenant of Mayors for Climate and Energy

In 2016, Bloomberg and Ki-moon launched **Global Covenant of Mayors for Climate & Energy (GCM)**, which Bloomberg still co-chairs with European Commission Executive Vice President for the

European Green Deal, Frans Timmermans [71]. Modelled on C40 Cities, according to the Covenant's mission statement, member local governments are required to,

'...commit to targets that will eventually be more ambitious than those of their respective national government, as defined through Nationally Determined Contributions (NDCs) under the Paris Climate Agreement.' [72]

However, and much as was the case with C40 Cities and UK100, no discussion seems to have emerged from GCM, nor from any of the 63 UK cities and towns that have signed up to its commitments, about whether or not the populations of those places have agreed to it [73]. Though these commitments are not of course legally enforceable, local authorities making such commitments without due democratic process begins to explain how APPs were put on local political agendas throughout the UK. And again, an organisation that the vast majority of people living in areas seemingly represented by mayors that are members of the GCM have not heard of, claims to represent them. A 2022 GCM report claimed that:

With one voice, the world's cities and local governments underscored their role as an effective driving force in implementing the Paris Agreement and called for stronger collaboration between levels of governments, private sectors, academia, and local leaders to support the urban net-zero transition. [74]

These claims are implausible in three important ways. First, and at least as far as elections in the UK are concerned, neither the objectives of the Paris Agreement in particular nor the climate agenda in general have been contested at local or national level by the UK's dominant political parties. Second, and as is discussed at various points in this report, turnouts for local elections are embarrassingly low, and cannot be taken as a mandate for 'the urban transition' in any case. Third, even the GCM's own formulation reveals its hostility to democracy: '*governments, private sectors, academia, and local leaders*' is a compact that omits the public.

The GCM does not publish financial data in its annual report but does list BFF and the European Union as the major funders. BFF's 990 forms indicate that the GCM has been funded (\$9.5 million in 2017) through BFF's grants to the European Climate Foundation.

9.5 ClientEarth

ClientEarth claims to '*work with policymakers to create good laws and to strengthen weak ones*', and '*make sure laws are properly implemented at EU and State level*' [75]. However, the more honest account of ClientEarth's business is green lawfare: '*When governments and institutions fall short of their legal obligations our lawyers take action to protect Europe's citizens and its environment*'. But it is not so much citizens that are acted for as ClientEarth's grantors. Those grantors include ECF, ClIFF, Bloomberg Philanthropies, Grantham, the European Union and European Commission, and departments of the UK, German and Norwegian governments.

ClientEarth is extremely active in the field of APPs, and cited among its achievements:

In the UK, court-ordered plans have led to proposals for Clean Air Zones to restrict the dirtiest vehicles in cities such as Birmingham and Bath and funding to help and support people and businesses move on to cleaner forms of transport. The Ultra Low Emission Zone in London has also been brought forward and within its first year has resulted in pollution levels that are 37% lower than they would have been without the scheme in place. [76]

Bizarrely for the recipients of £millions in grants from the UK government – more than a £1 million for each year 2016 to 2020 [77] – ClientEarth has sued the same government many times in an attempt to force the creation and enforcement of APPs. A 2016 article on ClientEarth’s website proudly boasts that,

In April 2015, ClientEarth won a Supreme Court ruling against the government which ordered ministers to come up with a plan to bring air pollution down within legal limits as soon as possible. Those plans were so poor that ClientEarth took the government back to the High Court in a Judicial Review. [78]

A 2018 article similarly boasts of further successes,

In a ruling handed down at the High Court in London this morning, Judge Mr Justice Garnham declared the government’s failure to require action from 45 local authorities with illegal levels of air pollution in their area unlawful.

A 2018 promotional film for ClientEarth claims that they had taken the UK government to court nine times over the issue of air pollution by that time [79]. Litigation of this kind is extremely expensive. Luckily for ClientEarth, its grantors parted with more than £28 million in 2021.

Climate lawfare, pioneered by ClientEarth in the UK, is a large and growing interest of green philanthropic foundations. A database of climate litigation shows hundreds of cases being heard or having been recently heard in courts throughout the world [80], including ninety in the UK [81]. Most of these non-criminal cases are brought by CSOs such as ClientEarth, using grants from philanthropic foundations. CIFF has \$64.8 million currently committed to climate litigation projects, including \$26.4 million to ClientEarth [82], and \$38.4 million to the Foundation for International Law for the Environment – a grant-making lawfare CSO founded by CIFF [83].

Lawfare was the predicted outcome of the UK Climate Change Act 2008. In the Bill’s Third Reading, Conservative MP, Peter Lilley argued that,

The sole effect of enshrining the targets in statute will be that the Government’s policies will be open to judicial review. Judges will be asked to assess whether measures introduced will be likely to be effective in ensuring that [emissions reduction] targets are met. I do not have a great deal of faith in the ability of Ministers of this Government, or perhaps any Government, to meet the targets, but the idea that judges should decide on policies costing billions of pounds, without being accountable to the electorate for the billions that they might decide need to be incurred, fills me with foreboding. [84]

Lilley’s foresight was correct. Legal challenges to infrastructure developments such as airport expansion, a coal mine, Thames estuary crossings, have all been challenged by litigation brought by green CSOs. Air pollution, too, has been the subject of green lawfare, as ClientEarth’s case history shows, much of it founded on air quality limits set by the European Union and the WHO, over which the national government has no control. As we have seen in other aspects of green philanthropic foundations’ and their grantees’ campaigns, lawfare is an attempt to circumvent democratic control of policymaking.

9.6 Imperial College London & Breathe London

Imperial College is at the centre of the technical debates about APPs and ULEZ in particular, as the GLA has engaged researchers at Imperial’s Environmental Research Group on a number of occasions to evaluate the Mayor’s policies and to provide evidence. Furthermore, some researchers at Imperial

are air pollution political activists in their own right. Others' academic profiles state that they have longstanding working relationships with the GLA in designing air pollution policies, as is discussed in our Spring Report. One major problem with this is the risk of policy-based evidence-making.

For example, in 2023, the Mayor's office produced an evaluation of the ULEZ expansion, which it claimed to have been 'peer reviewed' by Dr Gary Fuller of Imperial College [85]. Fuller, however, is author of a book – *The Invisible Killer* – the rising global threat of air pollution and how we can fight back [86] – and writes a Guardian column on pollution [87]. While nobody would deny scientists the right to their own ideological opinions and freedom of expression, the corollary is that our expectations of scientists and institutional science to be 'above' politics is misplaced (as we explain in the section, [Net Zero is ideological, not science-based](#)). In response to criticism of Fuller's engagement as peer reviewer, City Hall told The Telegraph,

'Dr Gary Fuller is a world leading academic looking at air pollution who also serves as an expert adviser to the Government. Any suggestion that Dr Fuller is anything but an independent expert in his field is nonsense.' [88]

But expertise is not equivalent to nor guarantee of independence as most people would understand it: of money, of government or of prevailing political influences, all of which are most visible around Imperial and its involvement with London's air pollution policies. Furthermore, standards of peer review differ markedly between publications but is typically a process in which reviewers are unknown to the author of the study under review, and engaged by the publisher, not the author. Fuller's approval was an assured positive – rather than objective – 'review' of City Hall's evaluation. City Hall's performance of 'peer review' and defensive rebuttal to criticism therefore puts a big question mark over the concept of Imperial's 'independence'.

As The Telegraph had noted, Imperial is the beneficiary of substantial payments from City Hall, including for the ERG's 2020 report that appears to be the origin of Sadiq Khan's claim that air pollution causes 4,000 deaths per year in London, which was commissioned by TfL and the GLA (offices of the mayor) and which was not peer-reviewed [89]. Moreover, of the five authors of the report, three of the authors' academic profiles clearly state their long-term working relationship with the GLA or other policymaking agencies.

David Dajnak – *"I have worked closely with London policy makers in implementing major changes to the city from the Congestion Charging Scheme (CCS), the Western Extension Zone (WEZ), the Mayor's Air Quality Strategy (MAQS), the Olympic Road Network (ORN), the Low Emissions Zone (LEZ) to the more recent Ultra Low Emissions Zone (ULEZ) and the future London Environment Strategy (LES) and London Environment Strategy Plus (LES Plus)." [90]*

Sean Beevers – *"I have over 15 years' experience in modelling policies aimed at reducing the air pollution exposure of city populations, and have worked closely with London policy makers to implement major changes to the city, from the London Congestion Charging Zone to the recent London Ultra Low Emissions Zone." [91]*

Heather Walton – *"She was involved in the benefits analysis for the cost benefit analysis of the UK National Air Quality Strategy 2007, has worked on quantification of health benefits for the UK Committee on the Medical Effects of Air Pollutants (COMEAP) since 1996 and is now Chair of the COMEAP sub-group on Quantification of Air Pollution Risk (QUARK). She was an invited expert for both the WHO projects 'Review of the Health Aspects of Air Pollution' and on 'Health Risks of Air Pollution in Europe' which set concentration-response functions for cost-benefit analysis of policies in Europe. [92]*

Investigation of GLA bodies' purchase orders reveal that in the years 2020 and 2021, contracts worth £1,081,167 were awarded to Imperial, mostly for air pollution studies. Additionally, a £757,000 contract was awarded as part of the Breathe London campaign (discussed below) in 2020 [93]. Imperial College also agreed to match the GLA's contribution of £4.35 million to a refit of the Royal Institution Building in Central London, for the construction of a Centre for Climate Change Innovation, now known as Undaunted [94], in which Imperial, the GLA and Grantham Institute are partners [95]. Imperial claims that Undaunted has helped low carbon product developers raise more than a \$billion since 2012 [96], and the project is supported by Bill Gates through his opaque Breakthrough Energy philanthropy and investment vehicles [97]. Given the patronage of one of the world's wealthiest individuals, the apparent financial success of the project, and the value of the real estate, it is not clear why so much public money was necessary.

Gates is a significant donor to Imperial, having made grants from BMGF to the college worth \$320 million since 2005, including \$93 million in 2020 [98]. But very few of these grants and their purposes are disclosed in Imperial's annual philanthropic giving reports, which also only give extremely broad statements of donations and donors [99]. This would suggest that Imperial's accounts of its donations are far from complete. As is discussed below, Imperial are keen to distance themselves from grantors with fossil fuel interests, but this principle of transparency is seemingly limited to only that policy domain. This opacity is a problem for a research organisation that is so close to policymaking, and indeed politics, and (as we argue above) political agendas.

Imperial does not offer accounts of either the Environmental Research Group at Imperial, or the Breathe London project. (And nor were Imperial willing to share this information following a Freedom of Information request.) Yet they are clearly departments, divisions or otherwise projects of Imperial college, which *are* funded by special interests, with sustained relationships with political bodies that cite their non-peer-reviewed, commissioned work to advance their radical policy agendas.

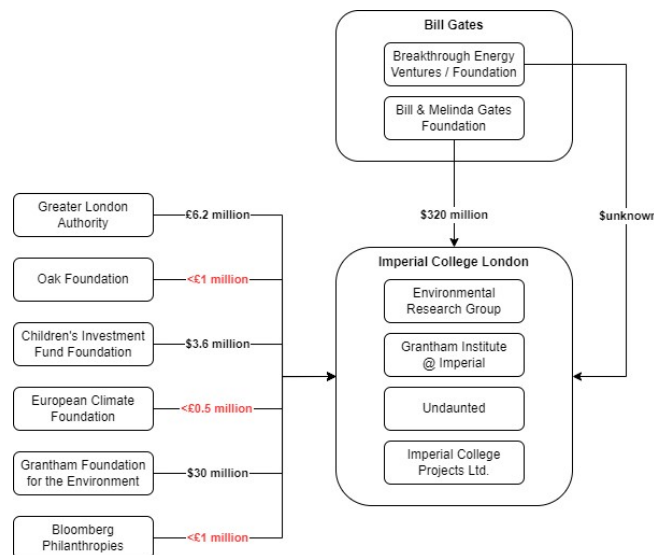


Figure 13. A network diagram of relationships between Imperial College and grantors.

No claim is being made here that Gates or any other donor has directly intervened to tell Imperial what its research agendas beyond what is ringfenced as a condition of funding must be. However, and leaving aside the grants made opaquely through Gates's Breakthrough Energy vehicles, there exists a face value case that research agendas *are* shaped by politics and philanthropy, and that research organisations shape their agendas according to funders' priorities. As the section on the Bill

and Melinda Gates Foundation and the WHO showed, concerns that philanthropic foundations were opaque, dominated research agendas, and limited diversity of research perspectives and approaches, and exerted undue influence, existed long before Covid. Extremely large funds and the nature of their intended beneficiaries' projects are clearly signalled to people with advanced degrees and research careers.

Another way of making the same point is to ask what would likely happen to a researcher, perhaps early in their career, who disagreed with the Mayor of London's air pollution policies? We can know that there would be a scientific basis for such a researcher's work, since, as we point out in our Spring Report and above, COMEAP, while then chaired by the ERG's chair Professor Frank Kelly, a substantial disagreement emerged between parts of the committee on the question of mortality risk. And we have also seen, domain experts have publicly disagreed with the Mayor's policies. But we also have seen the same chair of the ERG seek to belittle the work of colleagues in other departments, and going further than is reasonable to support a policy agenda at the behest of City Hall. Moreover, we know that significant sums of money, from both government and philanthropy, are predicated on academic support for that policy agenda. Is scientific consensus within a single research organisation really the result of scientific research, or would other pressures encourage a researcher to conform? If no less a figure than the director of the WHO can admit that philanthropists' grants *'are highly linked to their preferences'*, can we not expect the same pressures exist for researchers and research organisations? What substance exists to claims of 'independence'?

This nexus between business, academia, philanthropy, and government is typified by the Breathe London project, housed at the ERG at Imperial. Breathe London is based on a network of relatively low-priced but imprecise air quality sensors located throughout the city, data from which is adjusted to match data from higher quality 'reference' monitor stations. The data from these monitors is compiled and made available to other researchers and the public, 'to engage citizens in the issue of air quality as never before and catalyse a move towards a zero pollution future'. Individuals or organisations can even buy their own air pollution monitor, to add to the network for £2,400 [100]. The initiative was established as a joint project between Clean Air Fund, EDF Europe, City Hall, Cliff, and C40 Cities, with ongoing funding provided by Bloomberg Philanthropies [101].

But what is the value of this project and to whom? It is not clear that the data produced by the majority of monitors in the network is of any use to researchers. And though Breathe London has involved local campaigning and community groups, schools and hospitals – many of their sensors having been sponsored by Bloomberg Philanthropies – the educational value of their involvement is surely lost to the overtly political nature of the project, which is arguably misleading. The project clearly does not promote a critical understanding of the issue of air pollution, the costs and trade-offs involved, much less the dubious claims about the benefits that could be delivered by the elimination of air pollution altogether, as is discussed in the section [*What is the best that can be achieved by air pollution reduction policies*](#), above.

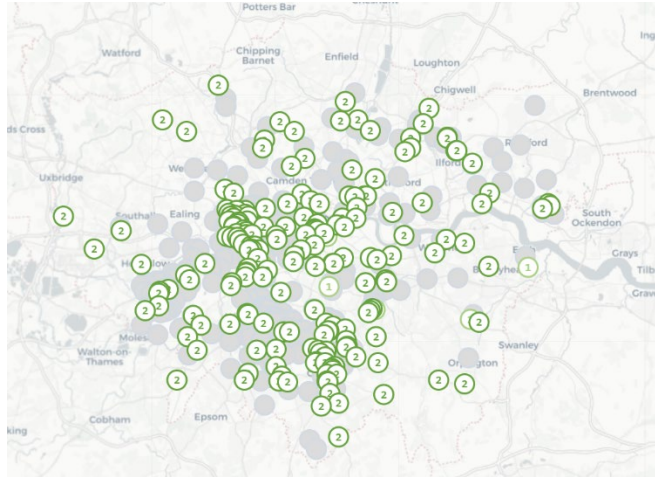


Figure 14. Air pollution monitoring stations in the Breathe London network.

Imperial is at the centre of controversies about APPs, therefore, not just because of its activist scientists supporting a policy agenda by producing non-peer-reviewed studies, based on misleading interpretations of contested scientific guidance, but because it is now also campaigning to engage the public in a controversial interpretation of the problem of APPs. Rather than being ‘independent’, Imperial’s ERG is clearly engaged in a collaboration between big philanthropic interests and their CSOs – business, in other words – and government. It seeks to engage the public, but gives no opportunity either to researchers who depart from the consensus to debate the issue, or to the public to contest the policies. The risk, then, is that philanthropy, civil society, and academia are now big businesses.

10 Funding Summary

- **Green campaigning organisations have immense resources compared to independent CSOs and vastly outspend any counterparts, including national political parties.**
- **Civil society is now owned by, rather than merely supported by, philanthropy.**
- **The influence of aligned CSOs and other public institutions is undemocratic and undermines democratic control of policymaking.**

In the above discussion about major philanthropic funders, we have seen undue proximity between billionaires and centres of political power and authority: Bill Gates and the WHO (and others), Michael Bloomberg and the United Nations, Christopher Hohn and London’s City Hall, Jeremy Grantham and academia, and The European Climate Foundation (representing many billionaires) and courts and the European Union. Underneath these philanthropists are countless civil society organisations, which, whether they are doing any good or not, are doing what money and power have decided, not what the public has been given any choice about. The sums of money involved – of which we have only surveyed a small slice of the total – are far beyond what the public, and genuinely independent organisations, are capable of raising. And the public have been left out of these relationships.

A summary of grants made by the abovementioned principal and strategic philanthropic foundations is shown below. Some discrepancies with other data shown above or elsewhere may exist, due to the nature of these organisations’ relationships and their minimal and opaque accounting. However, an attempt has been made to provide a total which avoids double-counting the grants made from principal to strategic foundations.

	2013	2014	2015	2016	2017	2018	2019	2020	2021	TOTAL
Principal philanthropic foundations										
BFF	19,855,000	3,475,000	31,919,000	30,973,852	29,300,627	46,570,314	63,840,000	73,430,000	202,644,668	502,008,461
CIFF	31,980,000	32,011,000	40,044,000	65,497,000	65,517,000	86,713,000	108,287,000	152,197,000	201,339,000	783,585,000
Grantham Foundations	21,303,201	22,299,767	27,764,315	21,983,469	34,424,947	28,969,901	35,914,950	37,267,461	57,028,973	286,956,984
Total	73,140,214	57,787,781	99,729,330	118,456,337	129,244,591	162,255,233	208,043,969	262,896,481	461,014,662	1,572,550,445
Transferred (principal to strategic)	8,838,000	3,961,000	0	8,658,000	22,661,000	21,174,000	51,635,000	78,504,000	77,524,000	272,955,000
Strategic philanthropic foundations										
CWF	152,133,601	126,684,942	76,972,216	66,911,923	51,209,339	64,366,167	56,690,080	78,693,394	140,110,736	813,772,398
ECF	35,238,350	38,632,510	43,145,700	50,598,240	38,246,053	44,382,381	85,919,680	111,866,794	144,533,556	592,563,265
CAF	--	--	--	--	--	--	8,418,150	4,114,497	6,472,871	19,005,518
Total	187,371,951	165,317,452	120,117,916	117,510,163	89,455,392	108,748,548	151,027,910	194,674,685	291,117,163	1,425,341,181
TOTAL	251,674,165	219,144,233	219,847,246	227,308,500	196,038,983	249,829,780	307,436,879	379,067,166	674,607,825	2,724,936,625

Figure 15. Climate-related grant-making by principal and strategic philanthropic foundations. The amounts passed between them are subtracted from the final total to avoid double-counting.

In the years 2013-2021, the three principal foundations made grants totalling \$1.5 billion. In the same period, strategic foundations made grants worth a similar amount of \$1.4 billion, which includes \$273 million in grants from principals. In total, \$2.7 billion of grants were made.

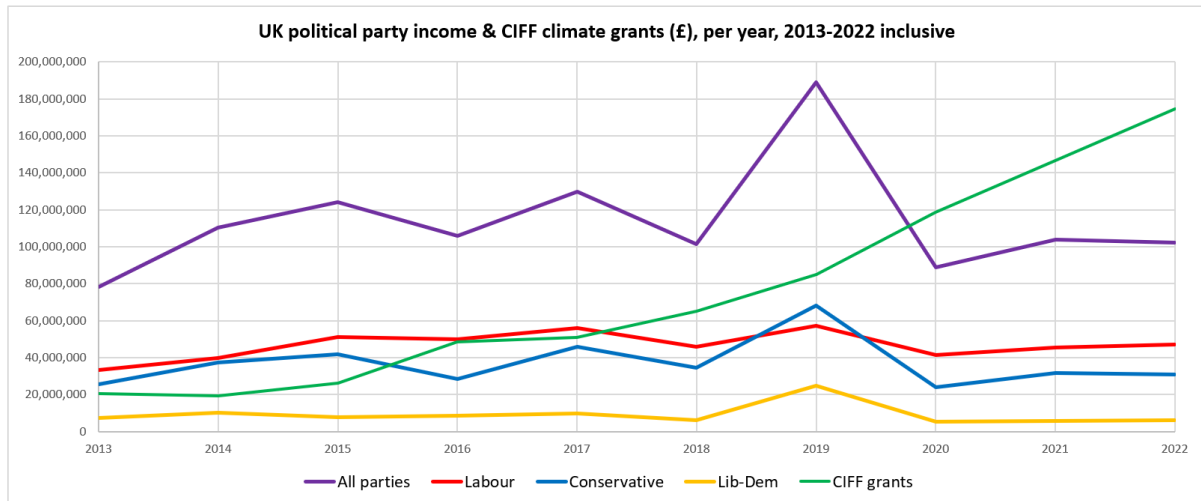
These sums are undoubtedly large. But their significance is made clearer by comparison. In the UK, there are very few organisations that have maintained critical perspectives on climate and energy policy. The most significant of these has been the Global Warming Policy Foundation (GWPF). According to the Charity Commission, the GWPF have had an average total gross income of £386,000 per year, for the years 2018-2022. At the current exchange rate, that is equivalent to \$470,238. Thus, the total grants made by the three principal foundations, and three strategic foundations are equivalent to 5,795 years of the GWPF’s operations.

A similar picture is revealed by comparing grants of just one principal foundation with the expenditure of UK political parties. Grants made to climate CSOs by just CIFF now significantly

exceeds all UK political parties combined, even most years with General Elections. Though this may not be a straightforward comparison, as CIFF is active internationally, much of this lobbying power is directed towards intergovernmental agencies and global negotiations, from which the public is completely excluded.

	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	TOTAL
CIFF grants	20,452,809	19,441,977	26,206,435	48,504,393	50,886,464	65,047,584	84,859,324	118,636,648	146,460,834	174,390,113	754,886,581
All parties	78,093,264	110,296,980	124,017,239	105,819,213	129,598,148	101,519,804	188,751,187	88,688,107	103,913,035	102,221,512	1,132,918,488
Labour	33,336,000	39,570,000	51,153,000	49,840,000	55,793,000	45,667,000	57,295,000	41,580,000	45,564,000	47,171,000	466,969,000
Conservative	25,411,311	37,524,768	41,956,377	28,311,985	46,030,490	34,301,949	68,061,276	24,044,364	31,781,099	30,744,252	368,167,870
Lib-Dem	7,303,514	10,344,295	7,881,909	8,524,031	9,710,307	6,202,599	24,617,940	5,316,746	5,733,339	5,945,228	91,579,908

UK Political party income vs CIFF climate grants (£)



Figures 16 & 17. Grants made by just one philanthropic foundation to green CSOs now significantly exceeds all UK political parties' spending.

This evidence and analysis gives some weight to the argument that national and local politics is no longer characterised by democratic contests of political perspectives, but by increasingly remote governments and intergovernmental agencies, from which the public are excluded, but to which billionaires and businesses and the CSOs and academic research that they fund are admitted. It is hard not to notice therefore, that the distinctions between money, political power, civil society, academia, and the news media are far more blurred than we might desire. Accordingly, philanthropy should no longer be viewed as it has in the past, as equivalent to 'charity'.

An important distinction exists between 'no strings' giving to a charitable concern and grant-making that may require that the grantor retains control over either an organisation in particular, or over the entire field in which multiple grantees are active. 'Civil society' has always depended on philanthropy and charitable giving. But as philanthropists have become wealthy beyond any historical precedent, philanthropic gestures from relatively few foundations easily exceed the public's capacity for charitable giving. Accordingly, a narrow set of interests can just as easily dominate civil society, aligning organisations to a single perspective, rather than, as is the supposed virtue of civil society, enable a diversity of perspectives from outside the state as such, within the public sphere. There is a risk, in other words, that civil society, rather than being merely enabled, may be simply bought, or even manufactured, to suit the needs of philanthropists, not the public interest.

Even charitable organisations' good intentions and good faith cannot be taken for granted, especially in the case that interventions from organisations that are funded by philanthropy have consequences far beyond what that organisation seems to be concerned with. Nobody could dispute the *desire* to eliminate communicable diseases, for example. But there exist many approaches to the control of

diseases, some of which may be therapeutic, but some of which may well move into draconian political interventions.

It is the belief of Together and Climate Debate UK that the public must be at the centre of politics, and that democratic, transparent, and open debate must precede policymaking. We furthermore believe that recent events have shown the extent to which the public has been pushed out of politics in general, and in a number of key policy domains in particular: Covid 19 and environmental concerns being chief among them. In these domains, governments have set out radical and far-reaching changes to our ways of life, requiring the rollback of longstanding political rights and freedoms, including democratic control of policymaking. Policy agendas now seems to be dominated by CSOs and academics; even domain experts have been excluded when they have seemingly spoken out against the prevailing political narrative and have faced censure and censorship. The public has simply not been consulted, much less been free to participate in discussion about or vote on important questions. In many cases, technocratic approaches are forced into policymaking at the expense of expert debate and democratic engagement by a sense of crisis or emergency that may not be founded. We believe that this is especially true in the case of air pollution, as we outlined in our Spring 2023 report.

11 Net Zero is ideological, not science-based

- **Net Zero policies have not been proven to be economically or technologically plausible, and require dramatic changes to people's lives.**
- **Both the dominance of CSOs and a cross-party political consensus in Westminster has excluded the public from politics.**
- **Net Zero requires a radical transformation of the relationship between the public and the state, which exceeds both science's ability to justify it and democratic mandates.**

Whereas until now many environmental policies, such as supply-side regulation of the energy market, have been invisible to most of the public, APPs are the most significant intrusion of the green agenda into their lives that the public have yet experienced. Other than covid lockdowns, which were intended to be temporary, no peacetime policy has so overtly prohibited behaviour that was previously lawful, and to which the population at large had grown accustomed. People in places restricted by APPs now report that visiting relatives and taking part in family and community life, commuting to work, travelling to hospital appointments, running small businesses – especially retail and hospitality – and carrying out trades are now either explicitly prohibited or made impossibly inconvenient, through congestion caused by road closures and by fines and charges.

Like much of the green policy agenda, these changes, which may have not been tested for democratic legitimacy, are argued for by advocates in terms of the necessity of the policy to mitigate risks. According to advocates, APPs make streets 'liveable', and protect the public from 'toxic air' [102]. However, as is shown in the section, [*What is the best that can be achieved by air pollution reduction policies*](#), these arguments for certain policies often lack both cost-benefit analyses of any kind and explanations of how normal life, and therefore society, can function without severe consequences after they are imposed. There are very real downsides to radical policies, which furthermore create new risks. As we explain above, the prohibition of cars may make the air 'cleaner', but the economic consequences of severe restrictions on mobility may have more serious negative impacts on health than the air pollution.

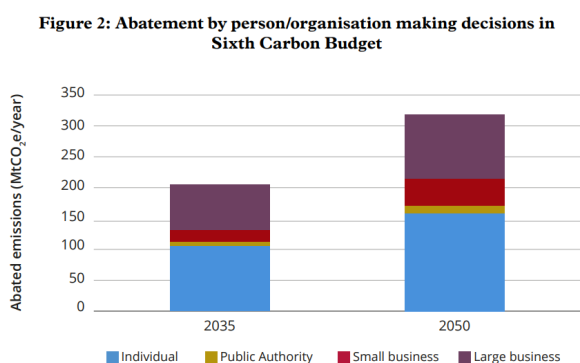
Whereas nobody would object in principle to 'clean air' or the reduction of pollution, real life requires the consideration of trade-offs between upsides and downsides of policy interventions that alter society's functioning. And it is very often ideology that organises such priorities. Some people may well be willing to eliminate pollution at all costs. But that position is manifestly ideological, as it permits no discussion about trade-offs. Many others are likely, with good practical reasons, to reject abrupt changes to their lives. Some may believe that economic alternatives to the petrol- and diesel-powered motor car, and other appliances that are the targets of green policies, must exist before policies that require the phasing out of the older technology can be enacted – a view that is rapidly gaining traction in the political mainstream. Others may argue that the benefits of industrial, democratic, and liberal society, such as material and political freedoms, are greater than their putative drawbacks, such as an altered environment. Finally, some may object that green claims and articles of faith, such as 'climate crisis' or 'climate breakdown' lack objective or scientific meaning, despite experts' embrace of such concepts.

Ideologies are system of ideas that require a particular organisation – and therefore radical reorganisation – of society, typically necessitating the use of the power of the state to achieve such a transformation. Whether or not any of the aims of green CSOs, such as APPs (and more), can be justified on their own terms (mitigation of risk), the green policy agenda requires nothing less than a

radical reorganisation of society. It would be foolish therefore to take at face value claims about the urgent necessity of policies. The ideological aspect of environmentalism must be considered before accepting green arguments for change.

As is cited above in the [section on C40 Cities](#), for example, a recent C40 Cities report argued for local authorities to exceed their mandate, and to ‘*exert influence over global emission reductions by promoting changes in the production and consumption of food, buildings and infrastructure, private transport, aviation, clothing and textiles, and electronics and household appliances*’.

Similarly, a 2023 study produced by the Centre for Climate Change and Social Transformations (CAST) at the University of Bath for the UK Committee on Climate Change (CCC), called ‘The implications of behavioural science for effective climate policy’ makes nearly identical recommendations, advocating interventions such as ‘nudge’ [103]. Evidence provided by the CCC [104] is used in a 2022 House of Lords Environment and Climate Change Committee report, *In our hands: behaviour change for climate and environmental goals*, which suggests that more than 300 million tonnes carbon dioxide equivalent (MtCO₂e) per year will be abated by behaviour change [105] – compared with 417 MtCO₂e in 2022 [106] – the largest single contribution to which will be a switch to EVs.



Source: Written evidence from the Climate Change Committee (CCP0112)

Table 3
Abatement from top twenty actions requiring some consumer engagement (by abatement) in Sixth Carbon Budget, Balanced Pathway, 2035.

Measure	Abatement 2035, MtCO ₂ e
ULEV - cars	56.8
Demand reduction international flights	11.3
Electrification in Manufacturing and Construction	9.4
ULEV - vans small business	8.4
ULEV - vans large business	8.1
ULEV HGVs	7.8
Diet change and food waste reduction	7.4
Heat pumps in owner occupied houses	7.3
CCUS in manufacturing and construction	5.7
Biodegradable waste landfill ban, reductions in food waste, increased recycling	5.6
Resource efficiency and material substitution in Manufacturing and Construction	5.5
Fuel supply sector fuel switching	5.1
Reduce waste airings	4.7
Heat pumps in new residential buildings	4.4
Energy efficiency in non-residential buildings	3.8
Reduce methane leakage in fuel supply	3.6
Hybrid heat pumps	3.4
Elastic compressors in fuel supply	3.4
Energy efficiency in manufacturing and construction	3.3
Reduced consumption of new resources in manufacturing and construction	2.8

Figures 18 & 19 from *Climate Change Committee reports and evidence to Parliament, as referenced above.*

In 2019, the UK government asked the CCC to produce a report on achieving Net Zero by 2050 [107] – advice which was subsequently taken by MPs who, following just 90 minutes of debate, decided to amend the target of the 2008 Climate Change Act without disagreement and therefore without a vote. The CCC advised that up to 62 per cent of emissions reduction could be achieved by ‘behaviour changes’. This claim drew from an early report *Behaviour change, public engagement and Net Zero* produced for the CCC by Dr Richard Carmichael of the Centre for Environmental Policy at Imperial College London [108].

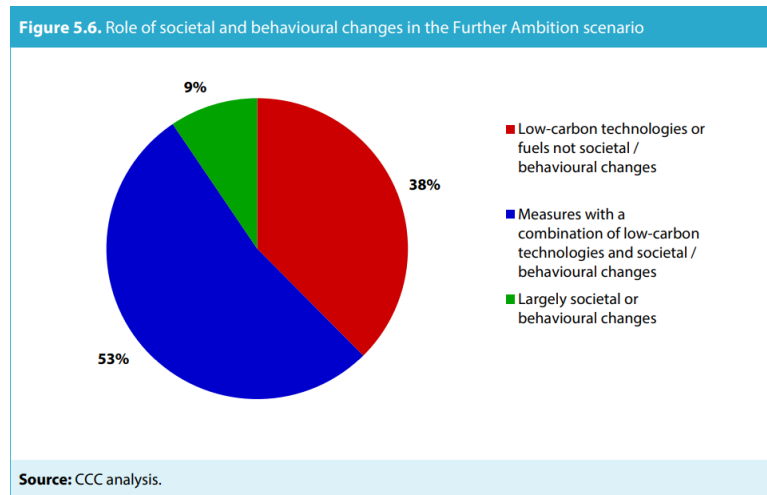


Figure 20. Climate Change Committee’s analysis of the contribution of ‘behaviour change’ to emissions-reduction.

Carmichael’s report advised that:

If the public are to become engaged with the climate challenge and contribute to achieving net-zero emissions then the wider policy context will also need to be more supportive. New, compelling narratives will be needed to inspire and mobilise mainstream participation in solutions, adoption of technologies and change in behaviours.

And that,

Policies will need to work together and in sequence to deliver change in behaviours and markets, avoid negative outcomes and build public acceptance. Access to attractive and affordable products and services, and support for informed choices and for new industry practices, should be in place wherever possible before interventions which raise prices for essential goods.

Whether or not reports of that nature make explicit arguments for a radical transformation of society, their *form* is nonetheless ideological, because they require radical transformations of relationships between the public and the state. Moreover, as this report argues, neither of those transformations has been put to a democratic test.

There is consequently a face value case that MPs and Peers, the CCC (whose advice the government and Parliament are obliged to hear), academics and CSOs have, in their enthusiasm for green policies, built a democratic deficit. This is epitomised by an apparent belief that ‘behaviour change’, equivalent to radical changes to lives, livelihoods, lifestyles, and the wider economy, can be produced by mere ‘compelling narratives’ and policies that provide ‘support for informed choices’. It is this report’s argument that such beliefs, which underpin APPs are not premised on people making *choices*, but on policies that *enforce* ‘behaviour change’, and that as such are not merely undemocratic, but antidemocratic. The change to society being sought by parties attached to the green agenda are not merely the alteration of such things as city plans and road usage, but the political order itself: the exclusion of the public from political decision making.

It is green CSOs themselves that produce the evidence for this dramatic argument. A 2018 report by Westminster-based think tank, The Green Alliance, *Building the political mandate for climate action* surveyed MPs for their views on the public’s appetite for green policies [109]. It found that

'politicians feel under very little pressure to act on climate change' and that *'They report limited interest from their constituents, and indicate that they need to find ways to make climate action relevant to the daily lives and concerns of the electorate'*. Implicitly recognising that the public had not been asked for their views, The Green Alliance recommended, *'Greater use of deliberative processes, such as citizens' assemblies'* and *'policies that build engagement and public support, rather than assume passive consent from the electorate'*. But how would this 'consent' from the public be achieved and measured, such that it could count as a 'mandate'?

A subsequent Green Alliance report in 2023, *Sustaining the political mandate for climate action*, assumed that consent had been achieved, and that climate change had *'become a mainstream issue'*, and that MPs report *'stronger demands for action from their constituents, compared to five or ten years ago'*, but that they were uncertain *'about how to manage the social, practical and political challenges of the net zero transition'* [110]. Public reaction to APPs, representing the first wave of that transition, demonstrate that the public has not been as convinced by either 'support' or 'compelling narratives', and are deeply resentful of the restrictions placed on their lives, enforced by fines. The Green Alliance is thus forced to use a conspiracy theory to explain resistance to green policies, concluding that, *'high carbon economic interests, particularly fossil fuel companies, have a strong financial incentive to shape and slow down the net zero transition'*, but provides no substantive evidence of this claim, much less its impact on members of the public, whose opposition to APPs grows by the day.

It must be understood that the changes required by both APPs in particular and the green agenda in general are not equivalent to policies that have protected environmental and human health in the past. It is often argued that contemporary policies are merely a continuation of legislation such as the 1956 Clean Air Act [111] or the 1980's abolition of lead additives in petrol. Two key principles make a distinction between legislation made in earlier and later eras. First, though earlier abolitions may have had some economic consequences, those consequences were easily borne by individuals and the economy with no significant loss of utility equivalent to the abolition or severe restriction of private transport. Second, these abolitions did not require the suspension of democratic control of policymaking.

In 2015, the Green Alliance coordinated a cross-party consensus on climate policy. The Show the Love campaign asked the leaders of the UK's three largest parliamentary parties to pledge, among other things, *'To work together, across party lines, to agree carbon budgets in accordance with the climate change act'*.



Figure 21. The 2015 Green Alliance ‘Show the Love’ campaign asked UK political party leaders to pledge to not contest climate and energy policy.

The fact of this cross-party consensus being on the wrong side of a democratic deficit, and being driven by ideology and contempt for the public, is set out most clearly by Alok Sharma MP, while serving as President designate for COP26, in a speech given to the Green Alliance:

I do believe we are at a vital inflection point. Where the views of governments, businesses and civil society are coalescing in a determination to tackle climate change.[112]

In his speech, Sharma used the term ‘civil society’ ten times, and ‘public’ not even once. The views of the public have been taken for granted, either as irrelevant or malleable, and subordinate to a compact between government, businesses, and ‘civil society’. But as this report demonstrates, civil society organisations dominant in the domains of APP and climate, and beyond, are merely little more than business lobbying organisations.

The green agenda meets the definition of ‘ideological’. It demands the radical reorganisation of society, despite acknowledging the high risk of hardships that individual policies, such as APPs, will create. It pays little attention to the views of those who will experience such hardships, instead resorting to untested claims from behavioural scientists about ‘compelling narratives’, and promising upsides such as health benefits, which, as we argue in the section, [What is the best that can be achieved by air pollution reduction policies](#), are highly contestable, are the subject of scientific controversy, are insufficiently tested by cost-benefit analyses, and are themselves driven by ideological preoccupations. It avoids expert criticism and debate by resorting to conspiracy theories and smears. And it takes for granted the rightfulness of the compact between CSOs, politicians, business and academia, and its determination to advance radical policies, with or without the public’s consent.

12 The air pollution issue is a proxy battle of the climate war

- **Climate politics has failed at global and national levels because differences between countries couldn't be reconciled and governments had no capacity to implement national policies.**
- **The green agenda was refocussed at the level of local government because it is where democratic engagement is weakest.**
- **Climate change was easily conflated with air pollution to drive emotionally-charged political campaigns.**

Clean air campaigns and APPs of one form or another have existed for a long time. London's Low Emission Zone (LEZ) came into effect in 2008, and all levels of government, from local to global, have sought tighter emissions regulations affecting vehicle design. However, the mid-late 2010s saw an escalation of ambition and rhetoric with more emphasis on behaviour than on technology, coinciding with the election of Sadiq Khan as London Mayor, who built on his predecessors' plans more forcefully. These ambitions were raised again during the Covid 19 lockdowns, when new road management policies and APPs were advanced, with the help of large grants from central government to local authorities, resonating with the 'build back better' slogan of the time. However, evidence suggests that acceleration of APPs occurred not because of new science or public demand, but to serve the climate agenda.

As is argued throughout this report, despite the establishment's political consensus, the public have never been meaningfully canvassed for their views on green policies. Though CSOs and others campaigned for an increase in the Climate Change Act's target from 80 per cent to Net Zero, the agenda's conspicuous lack of a mandate began to cause concern for policymakers. Despite seemingly representing the world finally coming together on the issue of climate change, the Paris Agreement era coincided with two huge setbacks to the political order that was being established on green politics: the election of Donald Trump in the USA and the vote for Leave in the referendum on the UK's membership of the European Union. Early in his presidency, Trump signalled his intention to withdraw the USA from the UN Framework Convention on Climate Change. And much UK environmental legislation had origins in Brussels, from which the UK would be free to set for itself. Popular democratic will was beginning to look like an obstacle for global and national climate politics.

A 2014 article in *Scientific American* captured the green movement's growing disappointment with global and national climate policy agendas and a new formulation of the climate agenda, stating that 'Climate Change Will Be Solved in Cities--Or Not at All', with the sub-title, '*As world leaders gathered at the U.N. to talk about global warming, mayors set about actually doing something about climate change*' [113]. The article quotes then C40 Cities chair, Eduardo Paes, mayor of Rio de Janeiro: '*Nations are not delivering*'. New York Mayor, Bloomberg's successor Bill de Blasio, said that, '*We have strong constituencies we can't hide from—we don't want to hide from*', and that elected Mayors '*are held accountable in a way that national leaders are not*'.

But the opposite may well be the case: mayors are not held accountable. As is discussed above, Bloomberg's electoral successes may well have been owed to his significant outspending of his rivals. Turnouts for New York mayoral elections are devastatingly low. In de Blasio's first election in 2013, voter turnout was just 26 per cent [114]. A similar, though not quite as devastating picture of London mayoral elections exists. No mayoral election since the post was established in 2000 has had a voter turnout higher than 45.3 per cent. Just 34.6 per cent of London's electorate voted in the referendum

on creating the position of London mayor in 1998. By contrast, the same year as Sadiq Khan's election, 69.7 per cent of the electorate voted in the referendum on the UK's membership of the European Union. Cities may have therefore been made the new hope of billionaire climate warriors because voters were far less likely to stand in their way, compared with national elections; much smaller numbers of voters could be mobilised by CSOs to much greater effect.

The fact of traffic-related air pollution being a local phenomenon offered further help to overcome the climate policy impasse. The climate agenda, which requires international agreements between national governments to orchestrate the phasing out of fossil fuels and the internal combustion engine, had failed to resonate with the public, but a more popular reformulation of radical environmentalism might be found by targeting local government with issues that seemed more immediate to people.

In 2017, Sadiq Khan declared that *'London's air is toxic and a silent killer'*, and announced plans for a ULEZ for central London and its eventual expansion [115]. Whereas alarming stories about global warming and climate change had failed to mobilise the public, the issue of air pollution was less abstract and remote. Children were made the victims in this alarming narrative. *'We must act now to tackle this air-quality emergency and prevent further damage to the health of Londoners'*, claimed the Mayor's website. If a climate emergency couldn't compel the public, an 'air quality emergency' surely would.

One counter to this observation might be that new or stronger scientific evidence had demanded more urgency from politicians. However, that is not the case. Air pollution mortality risk estimates were higher in the preceding decade, and identical stories about air pollution exceeding limits had appeared each January of 2014, 2015, and 2016 without provoking this new urgency until 2017 [116]. City Hall had commissioned air pollution studies from Kings College, London in 2008, that estimated *'4,300 premature deaths'* as a consequence of particulate pollution. That study was repeated in 2015, with an updated estimate of *'5,900 premature deaths across London associated with NO2 long term exposure'*. Those estimates of mortality created by particulate and NO2 pollution were combined to produce a retrospective estimate of *'9,400 equivalent premature deaths in 2010'*. But by 2017, that method was considered excessive, and the estimate downgraded *'to "thousands"'* [117]. As is discussed in the section, [*What is the best that can be achieved by air pollution reduction policies*](#), the following year, COMEAP produced a new method for estimating the total mortality risk from air pollution, though not without scientific controversy, ultimately leading to Imperial College's estimate of *'up to 4,000' deaths* – a *'statistical construct'*, which a number of COMEAP members believed to be misleading. The best that can be said about this urgent policymaking is that it got ahead of the science, which was only thinly-related to facts.

Air pollution science was, and still is, very obviously messy, weak, untestable, and controversial, and air pollution alarmism emerged in contrast to the cleanest air that London has had in its history as a city. In 2017, even Greenpeace's Unearthed news project had not been convinced by high estimates of mortality risk and published a 'fact check', which posed the question, *'is it fair and accurate to say that 40,000 [UK] deaths are caused by air pollution'* and, found that *'The experts disagree'* [118]. In the Autumn that year, the BBC's flagship Daily Politics show featured a debate between an activist from climate lawfare outfit, ClientEarth, and the late Professor Anthony Frew, a specialist in respiratory medicine. Frew told the show's host that,

...it isn't 40,000 people who die from it, it's a lot of people who lose a little bit of life at the end of their lives. And if you tot that all up, and you do some complex insurance-type maths

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on it, you can say it's equivalent to 40,000 lives. But it's definitely not 40,000 deaths, and there are no premature deaths that you can measure, as a result of air pollution. [119]

But debate was of little consequence to the refocussing of climate politics, which had begun to align CSOs, politicians and public institutions. Since neither scientific development nor popular are enough to explain the ascendancy of the air pollution crisis, perhaps money is the simpler explanation.

It is clear from our survey of philanthropic foundations that very few of the very many CSOs active in climate change would exist at all were it not for grants by a very small number of billionaires. Climate change is the dominant theme of BFF, CIFF, ECF, and GFPE, which have collectively granted \$billions to CSOs to campaign for political outcomes, though while seemingly acting as charitable funds and charitable organisations.

Air pollution campaigning in the UK represents just a small part of that enterprise but is entirely dominated by the same philanthropic foundations and CSOs. Grantees of CAF, for example, included the ECF, EDF, UK100, and engaged extant lobbying organisations such as the Conservative Environment Network, and right-of-centre think tanks with clear commitments to the climate agenda, such as The Centre for Policy Studies. Just one campaigning group was dedicated to the issues of air pollution – The Ella Roberta Family Foundation, but which was founded and funded by the same network.

No doubt, the issues of climate and air pollution may be related. But the sudden development of interest in air pollution in the 2010s is better explained by the coordinated strategy of global CSOs being driven by philanthropic organisations, than by a spontaneous change in public opinion or in science.



Figure 22. The Mayor of London, Sadiq Khan conflates the issues of air pollution and climate change, calling both 'crises' despite the evidence contradicting both claims.

13 Conclusions

A full account of the small number of billionaire philanthropists considered here and their support and control of a constellation of green organisations is far beyond this report's scope and our resources. These opaque and secretive organisations put very little information about themselves and their operations into the public domain. But because there are comparatively few organisations actively engaged in air pollution policy lobbying, and because they have been reckless in their campaigning, we have been able to show in microcosm what is a much greater phenomenon.

The rapid ascendancy of air pollution fears to dominate many local authorities' agendas revealed that, despite failures to sustain climate politics at global and national levels, the UK's political institutions have been all but a series of open doors to green philanthropic foundations and their CSOs. With democracy and diversity of opinion having been removed from public institutions of all kinds, the imposition of radical environmental policies such as ULEZ, CAZs and LTNs are no surprise.

This report has also only been able to scratch the surface of the reality of green politics underpinning APPs. However, we hope that it will provoke others, perhaps with greater resources to undertake similar investigations, based on our following conclusions.

UN and intergovernmental agencies. Although the UN is often referred to as an incorruptible authority on the most important issues facing the world, it is an undemocratic and unaccountable political body. Longstanding criticisms, and candid remarks from its own director, revealed that one of the most important UN agencies, the WHO, is extremely vulnerable to the whims of its philanthropic funders, most notably Bill Gates. But other philanthropists, directly and through CSOs, have also influenced the WHO. The WHO is important to the story of APPs because air pollution guidelines, set by the WHO and European Union, have figured in CSO's campaigns and academic literature, often in terms of 'illegal levels'.

In 2021, the WHO changed its guidelines on air pollution limits, claiming that '*Air pollution is one of the biggest environmental threats to human health, alongside climate change*' [120]. But climate change, whether it is happening or not, is of almost no consequence to human health. Rates of communicable diseases linked to climate have fallen dramatically in recent decades, as have all diseases of poverty, such as malnutrition. Agricultural productivity has increased across all parts of the world. Deaths from extreme weather events and natural disasters claim a fraction of the number of lives that were taken a century ago. The WHO gave little indication about what new thinking or evidence drove the revision of its guidelines. No radical new science has emerged, despite the WHO's claims, and air pollution mortality risk estimates remain stuck in scientific controversy. Moreover, as we have argued, the biggest threat to human health by far is still poverty – wealth is a far stronger predictor of health outcomes at all levels than is air quality. It seems very possible, then, that the WHO revised its guidelines as a condition of funding or other pressure. More scrutiny of such agencies, by national governments, genuinely independent CSOs and news media may shed more light on how such organisations work and what influences drive them.

Academia. Much like the UN, an implausibly high expectation of institutional science's objectivity exists, but which few academic institutions are capable of achieving. As we have seen, academic researchers, especially those working in the domain of environmental regulation, set much lower standards for themselves, as prescribed by the terms of PNS and the precautionary principle, for the sake of political expediency, not sound evidence-based policy-making. In the case of COMEAP, a

reasonable discussion was produced by the scientists involved, alongside its statistical estimate of the mortality risk of air pollution, which gave a good indication of a debate within the science.

But some academics, including the one-time chair of COMEAP, which produced the warnings about over-stating risks, have clearly ignored them and forgotten the fact of scientific debate, to engage in manifestly political messaging. Furthermore, the role of philanthropic funding and political engagement of research organisations seems likely to have produced a culture within them which is hostile to debate and independent inquiry. For instance, no researcher departing from the political consensus is going to either be welcome or likely seek a position at a department of a university called The Grantham Institute for Climate Change and the Environment, nor, it would seem, at the Environmental Research Group at Imperial College London. This problem is further evidence of the politicisation of public research funding bodies, such as UK Research and Innovation, which makes its funding priorities equally clear [121]. So where will debate and scrutiny of air pollution science come from, if not from within Universities?

National government. Governments since the 1990s have increasingly put climate change at the centre of their policy agendas. Yet, whereas this agenda has not been put to any test of the public's appetite for it, clear evidence shows CSOs and philanthropic foundations drafting policies for politicians who are either unwilling or unable to subject green campaigning organisations to any scrutiny in the public interest. Similarly depriving the public of a democratic contest of ideas, civil society organisations are shown working to engineer a cross-party consensus on climate, cemented by party leaders pledging not to contest policies, but to 'work together across party lines'. Meanwhile, other CSOs, but with the same funders, have sued governments, not merely for failing to devise or implement carbon emission reduction targets, but also to force them to impose air-pollution policies.

Local government. Echoing the failures of the UN, the EU and national government to subject green claims to scrutiny, local governments are far keener on radical policy agendas than are their populations. Local councils have taken it upon themselves to sign pledges put to them by CSOs, without checking first with residents of their constituencies. After the failure of global and national climate policies, local governments became the focus of the vast resources available to green organisations from green philanthropists, against which there existed no formal or organised opposition at all, much less any with matching resources. The cross-party consensus in favour of the green agenda, and widespread voter disengagement, if not disenfranchisement, made local authorities vulnerable to this immense pressure. This was amplified by central government making grants available for anti-car policies such as LTNs and CAZs during lockdowns, styled variously as 'Build Back Better' policies to encourage green economic recovery.

Financial regulators & institutions. Banks and financial regulators have been no less vulnerable to the campaigns of CSOs than have local governments. In our brief survey, we showed that the governor of the Bank of England had appointed Michael Bloomberg to chair a quasi-regulatory agency. While chairing that new agency, Bloomberg funded a raft of organisations to lobby that agency and central banks, financial institutions, and regulators. The Bank of England then enthusiastically absorbed the billionaire's recommendations. The governor was subsequently appointed to chair the billionaire's business empire. Meanwhile, despite the billionaire's appointment to run a task force under the remit of the G20's Financial Stability Board, it was not climate change that emerged as the greatest risk to financial stability. As the world recovered from lockdowns, a lack of investment in reliable energy infrastructure caused by the priorities of ESG, created an energy crunch that began to push prices out of control.

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