

WE CONTINUE **UNTIL ALL COMPANIES** **ARE PARIS- PROOF**



OVERALL POLICY FRAMEWORK
MILIEUDEFENSIE | FRIENDS OF
THE EARTH NETHERLANDS
2025-2030

 **MILIEU**
DEFENSIE
FRIENDS OF THE EARTH NETHERLANDS



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PREFACE

Milieudefensie | Friends of the Earth Netherlands is a key player in the climate justice movement. In our 2025-2028 strategy we focus on putting pressure on 30 of the largest CO2 emitting multinationals with a basis in The Netherlands. Our objective is to have them adopt climate plans that are in line with the 1.5° C scenario of the Paris Agreement.

To achieve this, we use all the tools that we have: our success in the Shell court case, our reputation and credibility in the public debate, our strong research capacity, our connections with policy-makers and our support base of over 230.000 Dutch citizens.

MISSION & VISION

Milieudefensie | Friends of the Earth Netherlands empowers people to collectively realize the social transformation needed for a good and healthy life on earth. For ourselves and future generations.

We strive for a society in which households, governments and companies contribute fairly to ending environmental and climate disruption.

We are the last generation who can prevent a climate disaster. That is why we focus our strategy on the climate crisis, with climate justice as the key priority.

CLIMATE JUSTICE

We are still heading for global warming of approximately 3° C by 2100, based on current climate policies, commitments, emission levels and trends.¹ There is a yawning gap between what we are doing and what we should be doing. The United Nations and the 196 countries that are party to the UN Climate Change Convention emphasize that they cannot achieve the climate goals alone. Urgent action, particularly from large companies, is needed.²

Climate change hits disadvantaged people the hardest. At the same time, the costs of climate policies are unevenly distributed, with average citizens paying the burden while companies and wealthy individuals raise their profits and have access to various 'sustainability subsidies'. This is an injustice that must be ended.

CORPORATE ACCOUNTABILITY

Climate change is not a natural disaster, but a consequence of deregulated markets and political capture by multinational corporations. Large companies are crucial to preventing a climate crisis. For example, approximately 50 companies are responsible for 80% of global CO2 emissions.³ These companies often escape accountability due to weak national and international laws, political influence and lack of public pressure.

We seem powerless: we know what needs to be done, but companies have become so powerful that governments have long since lost their grip on major polluters. But there is even the more unwillingness: the lack of action also stems from a lack of political leadership. Governments allow themselves to be held captive by the unhealthy, consciously dependent relationship they have with companies.

This must change. With climate justice, Milieudefensie | Friends of the Earth Netherlands focuses on the question of responsibility: who is responsible for what, and to what extent, in preventing dangerous climate change.

¹ In the Paris Agreement, non-party stakeholders including the private sector are specifically mentioned, page 133- 137: <https://unfccc.int/resource/docs/2015/cop21/eng/10a01.pdf#page=2>

² United Nations Environment Programme (2024). Emissions Gap Report 2024: <https://www.unep.org/resources/emissions-gap-report-2024>

³ United Nations Environment Programme (2024). Emissions Gap Report 2024: <https://www.unep.org/resources/emissions-gap-report-2024>



OUR STARTING POINT: 10 YEARS OF TARGETING MAJOR POLLUTERS

Milieudefensie | Friends of the Earth Netherlands achieved groundbreaking successes with the Shell climate litigation, experienced significant growth to 230,000 supporters and earned a position of authority in the public sphere. Our efforts are paying off and show that we are on the right track.

After winning our first case against Shell, the ruling of the higher court was a setback. But it gave us enough ground to file a new case in 2025, where we request Shell to refrain from putting new oil and gas fields into operation.

In terms of jurisprudence, we've brought about a groundbreaking change that has already visible impact on court rulings worldwide. We give organizations in other countries a whole new perspective: they're taking up the challenge and filing similar climate cases.⁴

Driven by a desire for internal coherence, in the previous years we moved from five different campaigns to a single, largescale focus campaign focused on tackling the thirty most polluting companies. And this had a visible impact on our effectiveness. Research by Wallaart & Kusse—evaluating the effectiveness of our policy—showed that, while we were previously perceived as activist, amateurish and unrealistic, we are now increasingly being presented as “climate experts.” Milieudefensie | Friends of the Earth Netherlands thus proves that you can be simultaneously professional and effective, even if you're an activist.



⁴ According to the Climate Case Litigation Database of the Columbia University currently worldwide 222 climate justice cases against Companies are active: <https://climatecasechart.com/>

OUR AMBITION: ALL COMPANIES PARIS-PROOF

The Paris Agreement is a legally binding international treaty on climate change, adopted in 2015 at the United Nations Climate Change Conference in Paris. It aims to limit global warming to 1.5 degrees Celsius, compared to preindustrial levels. Exceeding this limit leads to significantly more severe and irreversible impacts of climate change.

This requires drastic and immediate reductions in greenhouse gas emissions, including achieving net-zero CO₂ emissions by the mid-2050s

In 2023, Milieudefensie and the NewClimate Institute published the first groundbreaking ranking – the Climate Crisis Index – evaluating climate plans of 29 major international companies and financial institutions with a basis in the Netherlands. To meet the target of limiting global warming to 1.5 °C, climate plans must outline how companies will realize a minimum of 45% CO₂ reduction by 2030. The research showed that on average, the companies assessed would achieve no more than 19% CO₂ reduction by 2030.

The findings drew sharp criticism toward companies for lacking transparency, especially concerning scope 3 emissions, which typically account for about 80% of their total carbon footprint. We initiate climate dialogue campaigns with the companies, engaging employees, communities and consumers to pressure them into sharpening their climate strategies. Some react defensively—slamming the methodology or calling it “comparing apples and oranges.” Others use it as a wake up call.

“MILIEUDEFENSIE HAS PROVIDED THE EUROPEAN COMMISSION AND THE EUROPEAN PARLIAMENT WITH AN ALIBI TO ACTUALLY INTRODUCE REGULATIONS FOR COMPANIES.”

Diederik Samsom,
co-architect EU Green Deal

Simultaneously, the Index serves as a precursor to preliminary legal investigations, indicating our intent to possibly bring more lawsuits, on the heels of the earlier success in the Shell case.

We will continue to urge large polluting companies to reduce their CO₂ emissions in line with the Paris Agreement, while ensuring an equitable distribution of climate policy costs and benefits across society.

THEORY OF CHANGE

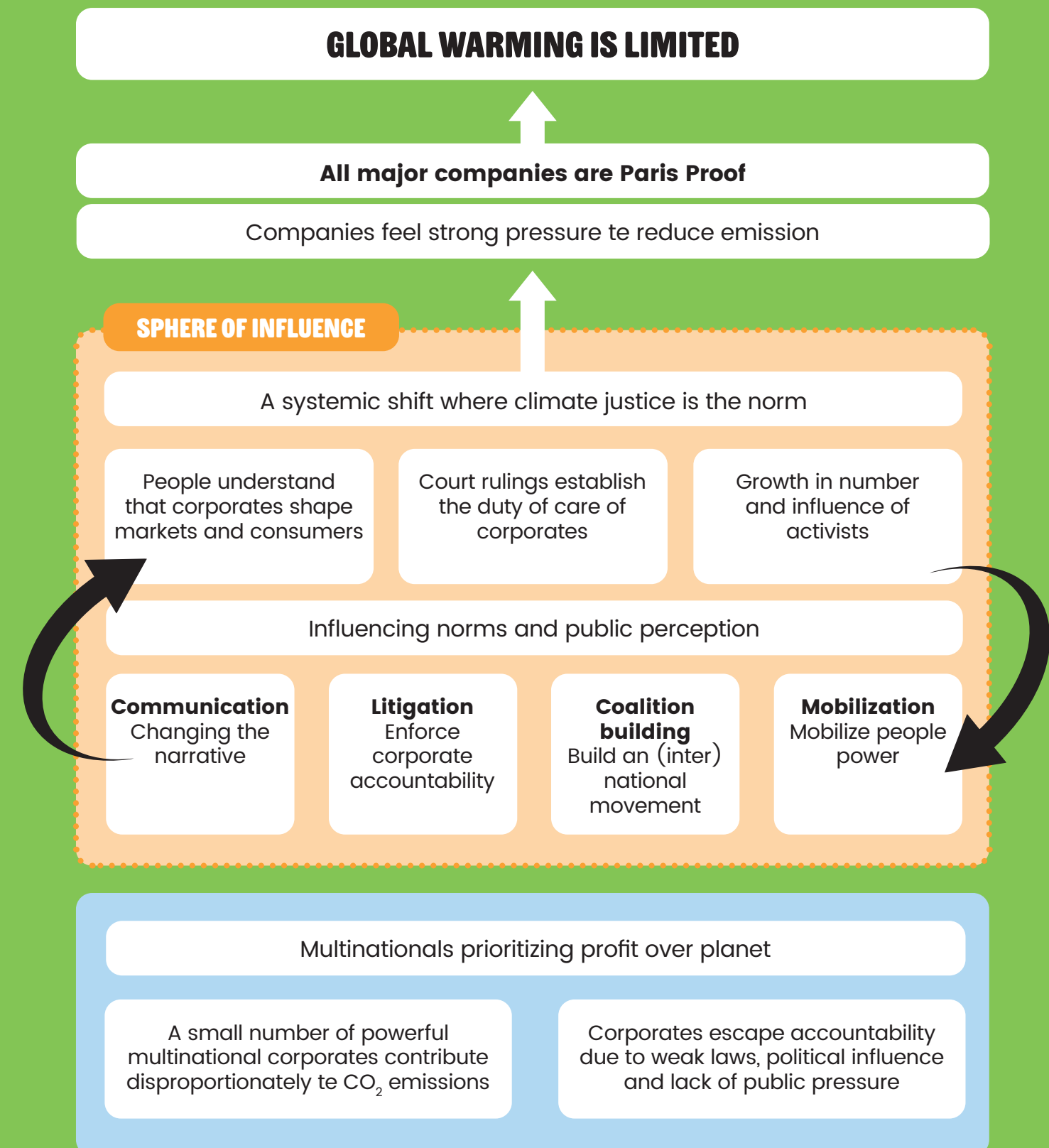
Milieudefensie | Friends of the Earth
Netherlands theory of change centers around the idea of system change. By shifting norms, laws and power structures, we aim to force polluters into compliance, proving that a just, fossilfree future is possible. By influencing the public debate, we work towards a systemic shift where climate justice is the norm. This is in line with the principle of the Overton Window, a concept by Joseph P. Overton, that describes how ideas change in society and influence decision making and policies.

We are building visible, public support for climate justice: a fair climate policy, where the largest polluting companies and the most wealthy contribute according to their ability to halting dangerous climate change. This way, we ensure that the biggest polluters make their fair share, while ordinary people are supported in the transition to a good and sustainable life.

The Overton Window, also known as the "window of political possibilities", is a model that describes the range of ideas considered acceptable in public discourse at a given time. It represents the spectrum of policies that politicians believe they can support without losing public support. The window can shift, expand or contract, influencing what policies are considered politically viable. Examples of such shifts are women's suffrage or same-sex marriage.



THEORY OF CHANGE



ASSUMPTIONS UNDERLYING “ALL MAJOR COMPANIES PARIS PROOF”

Companies carry responsibility towards the Paris Agreements	Companies shape markets and consumers Companies have the power and resources to stop dangerous climate change
Shifting norms is needed	Changing the societal norm (the “Overton Window”) is a necessary step to change laws and corporate behavior
Legal system can be a lever for corporate accountability	Legal rulings and public pressure can force companies to change faster than policy alone
Multi-level pressure is more effective than relying on regulation alone	Change will come not only through government action but also through pressure from employees, investors, risk raters, customers and civil society.

OUTCOMES: INTENDED SOCIETAL, CORPORATE AND SYSTEMIC CHANGES

Corporate Behaviour Change	<ul style="list-style-type: none"> Large polluting companies reduce CO₂ emissions in line with the Paris Agreement. Companies integrate climate targets into their policies and decision-making
Norm Shift in Society	<ul style="list-style-type: none"> Climate justice becomes a broadly accepted societal norm. Public and political acceptance of neccesary climate policies increases.
Systemic Pressure on Companies	<ul style="list-style-type: none"> Multi-level pressure from society, financial actors, employees, supply chains, and shareholders forces action. Increased scrutiny and accountability via climate litigation, the Climate Crisis Index and other public benchmarks.
Policy Impact	<ul style="list-style-type: none"> Broader public support shifts the political Overton window, making strong climate policies more feasible. Companies’ Paris-proof commitments influence and strengthen national and international climate policy.
Movement Growth and Empowerment	<ul style="list-style-type: none"> Sustainable and active climate movement of at least 600,000 changemakers. Regional expansion with 50 local groups actively engaged in climate campaigns.
International Spillover	<ul style="list-style-type: none"> Dutch corporate climate cases inspire and trigger international campaigns and legal actions.

OUTPUTS

Legal Action	<ul style="list-style-type: none"> Continuation of existing climate lawsuits (e.g., Shell, ING) Initiation of new lawsuits against major polluters
Public Campaigns and Mobilization	<ul style="list-style-type: none"> Large-scale public campaigns (e.g., climate marches, shareholder activism, Paris-proof municipalities) Public awareness and pressure generated through legal cases Visible public support for climate justice Strategic framing to shift public discourse
Movement	<ul style="list-style-type: none"> Growth to 600,000 active changemakers by 2030
Building	<ul style="list-style-type: none"> Expansion from 8 to 50 strong regional groups across the Netherlands Local activation and training through the Change Agents Academy
Corporate Ecosystem Pressure	<ul style="list-style-type: none"> Engaging key actors in the corporate ecosystem (e.g., accountants, insurers, ESG raters, legal advisors) Applying multi-layered pressure beyond government regulation
Accountability tools	<ul style="list-style-type: none"> Development of accountability tools like the Climate Crisis Index
International Scaling	<ul style="list-style-type: none"> Support for similar climate lawsuits and campaigns in other countries Building international coalitions with NGOs, unions, and climate movements towards the International Standardization Organization (ISO), The Science Based Targets initiative (SBTi), UNFCCC Binding Treaty and the EU Corporate Sustainability Due Diligence Directive (CSDDD).
Framing and Narrative Shifting	<ul style="list-style-type: none"> Strategic use of framing to shift the Overton window towards climate justice Broadening public and political acceptance of climate policies
Workplace Engagement	<ul style="list-style-type: none"> Activation of employees within target companies to push for internal sustainability changes Pilots to scale up internal company changemaker engagement
Ally expansion	<ul style="list-style-type: none"> Strengthening the alliance of over 400 partner organizations Increased collaboration with progressive companies supporting climate goals

OBSTACLES

RISKS	MITIGATION
Corporate Capture: Companies leverage political influence to block effective regulation	Demanding democratic accountability by climate litigation and eco-system pressure
Weak Societal Pressure: Insufficient public demand weakens policy ambition.	Mobilize and organize public demand
Governance Gap: Global companies operate beyond the reach of national law.	Promote international coordination and legal mechanisms to close this gap.
Public Perception: Corporate narratives dominate the public sphere.	Shift the discourse using smart framing, values-based storytelling and media advocacy.



OUR STRATEGY

Changing the behavior and policies of major polluters requires a decisive strategy on several fronts. Major polluters are influenced not only by legislation, but by a multitude of other factors: pressure from society, their partners and customers, sectoral agreements, demands from their accountants, major investors, shareholders and rating agencies. Our strategy is therefore not so much aimed at enforcing government regulation (vertically), but directly at influencing directors and employees within large polluting companies and at regulating companies through pressure from the broader ecosystem (horizontally). We also collaborate with companies that are taking significant steps to demonstrate that things can truly be done differently. With this strategy, we are much less dependent on political will. And we have a wealth of resources and activism at our disposal.

Four obstacles to conquer

The vast majority of large companies worldwide is not meeting the objectives of the Paris Agreement. According to the Carbon Disclosure Project (CDP), which provides a platform for companies to register their emissions data, only 21% of European companies are making real progress with their climate policies.⁵ An important caveat here is that the CDP relies on data provided by companies themselves, which sometimes does not reflect the actual situation. The number of companies lagging behind may therefore be even higher than reported.⁶

We therefore asked ourselves: what are the most important obstacles we must overcome to ensure that companies act in accordance with the Paris Agreement, and how to overcome them? The four most important ones are described here.

Corporate capture <=> Legal Action & Ecosystem pressure: Large companies use their political influence to gain control over the state’s decisionmaking mechanisms and enforcement bodies. In doing so, they manipulate decisionmaking in their favor, at the expense of the public interest. The increasing power imbalance between multinational corporations and governments is exacerbated by globalization, deregulation and privatization. The way society views companies, for example as job creators or climate leaders, legitimizes their power and shield them from critique.

To conquer this obstacle, we will continue to pursue legal action, following our climate case against Shell and the climate case against ING. We see that filing lawsuits is currently the most persuasive way to exert pressure on major polluters. In courts, facts count, not political framing. And while multinationals seem to act above the law, a court decision is binding and enforceable. Court rulings can set a precedent for systemic change, having a significant impact on other multinationals as well as on public perception. A single win can establish a legal duty of care and re-frames climate action as a legal right, not a political option.

Many companies are also more influenced by actors in their own environment than by formal laws or political pressure. This ecosystem includes accountants, ESG rating agencies, insurers, law firms, supervisory boards, investors and creditors. They influence corporate decisions by assessing risks, setting standards and demanding transparency. By targeting this broader network, Milieudefensie | FoENL increases the indirect pressure on companies to align with the Paris Agreement.

⁵ CDP Europe Report (2024). Get the money moving. Meeting the European corporate transition challenge: https://www.oliverwyman.com/content/dam/oliver-wyman/v3/template-scripts/cdp-report/pdf/CDP_Europe%20Report_2024.pdf
⁶ Climate Impact Partners. (2023). Fortune Global 500 Climate Progress Continues: <https://www.climateimpact.com/news-insights/fortune-global-500-climate-commitments/>

**Weak Societal Pressure <=>
Mass movement mobilization.**

The majority of people in every country in the world worries about climate change and support policies to address it. According to recent research⁷, people think climate change is a serious threat, and humans are the cause. Concern was high across countries: even in the country with the lowest agreement, 73% agreed. It is our ambition to set all these people into motion, to exert democratic influence and demand fair climate policies. We mobilize mass public support through campaigns and media, to increase social pressure on companies and influence public discourse. Strategies like “big organizing” enable local action to gain national impact. We invest in changemakers by offering practical training, campaign tools and leadership pathways.

**Governance Gap <=>
International change power.**

In recent decades, globalization, deregulation and privatization have led to an everwidening

power imbalance between governments and large multinationals, to the benefit of the companies: they are not bound by binding international human rights obligations. Economic treaties also offer them protections and privileges, which, surprisingly, go far beyond those of citizens.⁸ This means for example, that companies can sue states through international arbitration systems if their profits are threatened by environmental or social legislation, while citizens and communities often lack comparable means to hold companies accountable in turn.

We show the responsibilities of major multinational polluters to take action, while they are generally more powerful than governments and can, therefore, ignore the rules. That is the crux of what needs to change.

By addressing multinationals, Milieudefensie | FoE NL operates in an international arena. In collaboration with allies, we are applying the model developed in the Netherlands

to the international context. In this way, we are helping to build an international force for change, a coalition of civil society organizations, scientists and experts with which we exert pressure to ensure that companies comply.

Public Perception <=> Public debate

Companies can exert their power most effectively when issues remain out of public view “what you don’t know won’t hurt you.” In the so-called backrooms, companies can negotiate with politicians without much resistance. As soon as issues become part of the public debate, the balance of power immediately shifts in favor of our overall social interests. This is where unions, NGOs, social movements and political opponents gain a voice. Corporate power, therefore, declines as public and political attention increases.⁹

Influencing public debate is our most important tool for achieving our goals. That’s why we’re building visible public support

for fair climate policy by packaging our message as cleverly as possible. This way, a broad target group can easily internalize it. We call this “framing,” and it’s about how you express the essence of what you’re doing. But it’s much more than just clever language; it’s a language game. And, more importantly, whoever sets the frame controls the conversation — and that also applies to the public debate. That’s why we’re taking framing even more seriously over the next five years than we already have. By framing the debate, influencing public perception and generating political space for strong climate policy, we shift societal norms according to the Overtonwindow theory.



⁷ <https://www.science.org/doi/10.1126/sciadv.adj5778>

⁸ Sweet, P. (2016). Corporations dominate world's top 100 economic entities

⁹ Oxley, Z. (2020); Framing and Political Decision Making: An Overview



STRATEGIC FRAMEWORK

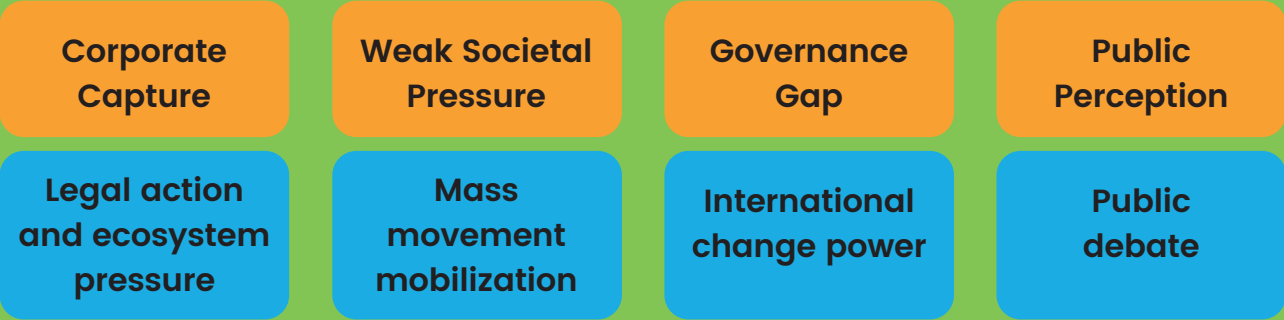
MISSION: Milieudefensie empowers people to realize the transformation needed for a good and healthy life on earth.

VISION: Ecological justice (long term). Climate justice (5 years)

GOAL:
All companies Paris proof.

TRANSFORMATION THEORY:
Shifting the narrative

PRIMARY PROCESS > PUBLIC CAMPAIGNS



STRATEGIC ENABLERS | OPERATIONAL ENABLERS



STRATEGIC & OPERATIONAL ENABLERS

Our goal is to make an even greater impact in the coming years. To this end, we have evaluated and refined our strategy and tactics. We know which obstacles we need to overcome and how we plan to address them. But our strategy can only flourish if we, as an organization, create the right conditions. Therefore we developed strategic and operational enablers:

Leadership & Positioning

- Milieudefensie | FoENL positions itself as “reasonably radical” making use of the current economic and legal system while pushing for deep structural change from within.
- Milieudefensie Youth: We engage with young people, not just talk about them. The chair of Milieudefensie Youth is part of our management team.

Evidence-based

- All actions are grounded in climate science, legal precedents and socio-political analysis to ensure credibility and effectiveness.

Changemakers are the engine of transformation

- We grow from 200,000 to 600,000 supporters
- We support individuals to act within their communities, companies and institutions.

Alliances & Partnerships

- We collaborate with over 400 partner organizations.
- We engage progressive companies, unions and civil society groups.
- We work with international climate justice networks to scale impact.

Data-Driven Approach

- Strategies and campaigns are guided by insights from data, research and public engagement metrics.

Enabling Space

- Democracy and the rule of law is essential for the success of our climate justice agenda. Therefore, we stay alert to national and international developments that threaten civic space. We evaluate developments annually, prepare for risks and make the most of available opportunities.

WE MAKE THE IMPOSSIBLE INEVITABLE



THERE
IS NO
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