



COP CO-OPTED?

How corruption and undue influence
threaten multilateral climate action

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How Corruption and Undue Influence Threaten Multilateral Climate Action

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EXECUTIVE SUMMARY

Undue corporate influence at UN climate conferences can undermine climate policy and action. These risks are especially apparent when the host nations of the Conference of the Parties (COP) are fossil fuel exporters with corrupt and autocratic governments.

The world faces an unprecedented threat from climate change caused by greenhouse gas emissions from more than a century of reliance on fossil fuels in energy, transport and industrial systems.

The enormity of the challenge requires coordinated, ambitious and evidence-informed action to reduce greenhouse gas emissions and phase out fossil fuels. Global warming must not surpass a global average of 1.5 degrees Celsius above pre-industrial levels, in order to protect ecosystems and human security.¹

Every year, world leaders and national delegations, together with scientists, activists, and trade, finance and industry representatives, gather at the international Conference of the Parties (COP) to the United Nations Framework Convention on Climate Change (UNFCCC) to report on their progress and negotiate further measures to prevent and respond to human-caused climate change.

The COP host country rotates annually through five UN regions. In addition to providing the infrastructure for the event, the host country government typically proposes a president, who once nominated is responsible for “raising ambition to tackle climate change internationally” and liaising with country delegations to ensure successful negotiations during the COP.²

At COP 28, hosted by the United Arab Emirates (UAE) in 2023, all Parties committed to transition away from fossil fuels in energy systems by 2050.³ At the same time, however, the UAE appears to have used its COP presidency to sign an avalanche of new

oil and gas deals for the state oil company, with the COP 28 president even using some COP-related meetings to advance company deals.⁴ And despite agreement on the need for a global energy transition, political and industry leaders around the world have clearly signalled their intention to continue exploiting new fossil fuel reserves.⁵

This report finds that in its current form, COP, as the main global forum for setting the climate policy agenda, is at risk of being undermined by undue corporate influence and fossil fuel industry capture. Corruption and kleptocracy, too, threaten the integrity of climate conferences, including the upcoming COP 29 in Baku, Azerbaijan, in November 2024.

A range of stakeholders have raised concerns about Azerbaijan's selection as host of COP 29⁶, and in September 2024, the *Financial Times* reported that some climate negotiators from the EU and western country delegations were already frustrated that the COP 29 Presidency appears reluctant to prioritise decarbonisation in the climate talks.⁷ In October, Urgewald and CCE Bankwatch Network published a report detailing Azerbaijan's oil and gas expansion plans and raising concerns about whose interests will be heard at COP 29.⁸

Indeed, this report finds that through its organisation of COP 29, Azerbaijan, with its autocratic government, large fossil fuels sector, and severe levels of public sector corruption, clearly illustrates several risks to the integrity of UN climate conferences.⁹

It is important to highlight that these risks are not unique to Azerbaijan or COP 29. The hosts of COPs 28, 29 and 30 – the UAE, Azerbaijan, and Brazil — are all significant fossil fuels exporters with state-owned oil companies. These three countries have formed a “Troika” which claims to be committed to the Paris Agreement target of keeping global warming below 1.5 degrees Celsius.¹⁰ But evidence from Dubai, and this report’s analysis of the upcoming COP 29 in Baku, suggest that some members of this Troika can use the COP events as diplomatic showcases to support their domestic oil industries, sign new fossil fuel deals, and sanitise their records of human rights abuses and environmental harms.

These risks extend beyond the Troika, and even beyond the fossil fuels industry, as other industries may seek to leverage their influence over COP hosts to secure unduly favourable outcomes that impede climate action.

The UNFCCC, its Parties, and the global climate community must urgently act to reform some key aspects of arrangements for COP to prevent private interests from co-opting the climate conferences and inadvertently enabling corruption and authoritarianism.

RISKS TO COP INTEGRITY

Risk 1: COP negotiations can be unduly influenced and captured by corporate interests, including fossil fuels companies

There are currently no limits or transparency requirements on corporate sponsorship at COPs, and corporate guests can participate in national delegations without having to declare their interests (see page 11-12). This gives them enhanced access to decision-makers. Already apparent at previous COPs, the lack of guard rails against corporate influence is especially problematic when hosts like the UAE and Azerbaijan have powerful state-owned oil companies.

Azerbaijan’s state oil company, SOCAR, is closely connected to preparations for COP 29. The COP 29 president-designate is a former senior executive at the company. SOCAR’s president is a member of the COP29 Organising Committee, and the CEO of COP 29 sits on SOCAR’s supervisory board. The chair of SOCAR’s supervisory board is also involved in planning COP 29 (see page 17).

Moreover, several international oil companies have significant business interests in Azerbaijan and rely

on their close relations with the autocratic regime of President Ilham Aliyev for market position (see chapters 1, 3). Fossil fuel lobbyists, already heavily represented at recent UNFCCC climate conferences, may consider the Baku summit a prime opportunity to secure a place for continued fossil fuel expansion in the multilateral climate agenda.

Additionally, the UNFCCC does not require host countries to declare the interests of public officials involved in organising COP, or for host countries to adopt transparency practices that can reveal potential or actual conflicts of interest of the president and conference organisers. Azerbaijan does not publish information about the assets and liabilities of public officials and their families and has high levels of public sector corruption.¹¹ Political and economic power is extremely concentrated, including in the energy and construction sectors (see chapter 1). Because of Azerbaijan’s climate push around COP 29, these sectors are likely to receive additional investment and potentially international funding for renewables infrastructure. Members of the COP29 Organising Committee with interests in the energy sector have already been accused of conflicts of interest and corrupt public procurement (see pages 14, 18). There are currently few obstacles to attempts to influence or capture new investments.

Risk 2: The COPs can become a forum for fossil fuel diplomacy and deal-making

The UNFCCC currently lacks robust guardrails against corporate and fossil fuel influence in the host country’s organisation of COP. As noted above, several current and former executives and representatives of SOCAR have prominent roles in the organisation of COP 29 (see page 17). This follows the UAE’s unprecedented abuse of the COP 28 Presidency revealed by Global Witness, in which the Abu Dhabi National Oil Company pursued US\$100 billion worth of deals.¹²

While Azerbaijan holds the COP Presidency, SOCAR is pursuing a strategy of regional expansion and collaborating with international oil companies to develop new exploration and extraction projects. SOCAR executives have already been seen mixing matters related to COP 29 with new business agreements to explore and develop fossil fuels production with European energy companies (see Chapter 3). In the lead-up to the summit, SOCAR and its most important international partner, BP, have been publicly celebrating their lucrative and long-running collaboration and signing new deals (see page 23).

Risk 3: The organisation of COPs can become an opportunity for corrupt and kleptocratic personal enrichment

There are no specific good governance requirements for countries registering their interest in hosting UN climate conferences, so countries with autocratic and corrupt governments can easily take the reins. Several of the COP 29 “Green Zone Partners” have clear or alleged links to the first family of Azerbaijan (see page 15), providing these companies with potentially lucrative marketing opportunities and a platform to present unproven green credentials on the world stage.

Ahead of COP 29, investigative journalists have revealed that Azerbaijan awarded a multi-million dollar no-bid contract for COP 29 guest accommodation to a business owned by the former son-in-law of President Aliyev (see page 15). As noted above, no transparency is required around corporate sponsorship of COPs and such practices can lead to higher costs for participants, resulting in reduced participation from groups with limited resources, including civil society and Indigenous peoples.

Risk 4: Hosting COP can become an opportunity for greenwashing

In theory, the COP president is a neutral convener of a forum for negotiations. Yet, host countries often take the summit as an opportunity to promote their green credentials and advance their own vision for the future on the world stage. Where commitment to solving the climate crisis and upholding human rights are weak, this can create a contradiction. There are no readily enforceable checks and balances on how the host may use the COP brand to promote its own agenda, which might include false solutions that can distract from ambitious climate policy and action and move away from science-backed targets.

In keeping with the fossil fuel industry messaging playbook described by Influence Map¹³, the Azerbaijani government claims that fossil fuel expansion is compatible with multilateral climate goals. The COP 29 organisers are paying a public relations firm almost US\$5 million to undertake a blitz of strategic PR activities that help mainstream this message (see page 29). At the same time, upon closer inspection, one of Azerbaijan’s flagship green energy projects seems designed to boost the country’s oil and gas exports, while plans for long-term roll-out of offshore wind power appear

designed to favour fossil fuel incumbents (see page 25-26).

Media and civil society play a vital role in detecting and calling out attempts at greenwashing. Current COP hosting agreements seek to ensure the participation of accredited media and civil society in the official conference venue. However, there are currently no criteria for host governments to guarantee the right to freedom of expression outside of the conference premises.

In Azerbaijan, independent media and civil society are highly repressed.¹⁴ The government has silenced critical civil society voices and reportedly holds over 300 political prisoners.¹⁵ Meanwhile, however, the COP 29 organisers have established a “COP29 NGO Coalition,” which appears to be an example of the Aliyev regime’s tactic of using government-approved organisations to create an impression of civil society participation (see page 26-28) and delegitimise criticism.

A lack of independent oversight by media and civil society organisations exacerbates the risk that governments use COP to greenwash energy projects and whitewash their human rights records.

A complex picture

Azerbaijan’s organisation of COP 29 illustrates how several of these risks can interact. For example, an industrial conglomerate linked to the family of the country’s president might be awarded potentially lucrative partner status at the conference (see page 15). This can give the company greater access to, and influence over, climate negotiations, potentially contributing to watered-down agreements and policies. If the conglomerate has interests in the fossil fuels sector, the international marketing and networking opportunities created by the climate conference may lead to new fossil fuel industry deals for the company.

At the same time, thanks to its government connections, the conglomerate’s subsidiaries may be first in line to benefit from investment in renewable energy infrastructure, further entrenching the role of fossil fuel incumbents and weakening market competition that can accelerate the transition. When all this happens in a vacuum of independent, local oversight, the potential for corrupt activity and undue corporate influence increases.

COP 29: Know Before You Go

The entire COP community should be cognisant of how the interests of Azerbaijan's fossil fuels industry and its key players may be influencing the actions and positions of the COP 29 Presidency and Azerbaijan's role as host.

1. Organised by oil men. Azerbaijan's state oil company, SOCAR, is heavily involved in the preparations for COP 29. The COP 29 president-designate is a former senior executive at the company. SOCAR's president sits on the COP29 Organising Committee, and the CEO of COP 29 sits on SOCAR's supervisory board. The chair of SOCAR's supervisory board is also involved in planning COP 29 (see page 17).

2. Deals on the line. COP 29 is at risk of becoming another forum for fossil fuel diplomacy and deal-making. With SOCAR currently pursuing a strategy of regional fossil fuels expansion, senior SOCAR figures have been seen mixing COP business with deals for the national oil company.

3. Reputational laundry. A slick multi-million-dollar PR campaign for COP 29 is also supporting the Aliyev regime's arguments that continued fossil fuel industry expansion is a necessary part of the green energy transition. In parallel, and while the Aliyev regime silences critical civil society voices, the organisers have established an "NGO Coalition," which includes organisations with links to the Azerbaijan government and track records of uncritical support for the Aliyev regime (see Chapter 4).

4. Inside Games. Some members of the COP29 Organising Committee have been involved in high-profile corruption scandals. There are already clear signs that COP 29 is being used to promote the business interests of the first family of Azerbaijan (see page 15). This includes a major contract for COP 29 guest accommodation.

5. Green veneer. On closer inspection, one of Azerbaijan's flagship green energy projects seems designed to boost the country's oil and gas exports, while long-term plans for the roll-out of offshore wind power seem designed to further entrench the position of fossil fuel incumbents (see page 25-26).

RECOMMENDATIONS

The UNFCCC has lacked adequate integrity rules for too long. Meanwhile, the opaque influence of fossil-fuel interests over governments is undermining progress towards the climate goals of the Paris Agreement.

The case of Azerbaijan, as evidenced by this report, illustrates how the lack of guardrails can allow COP to be unduly influenced and captured by corporate interests, and can become an opportunity for greenwashing and corruption.

After COP 26, where some observers reported obstacles to participation, the UNFCCC Secretariat launched a process around observer engagement. Since last year, COP delegates are required to declare their professional affiliation when they register for COP online. However, the process falls short as disclosure remains limited and voluntary. Moreover, delegates can keep their affiliation hidden during negotiations.

The UNFCCC Secretariat can do more. The Secretariat has a special responsibility to live up to its mission of "protecting the integrity of the UN Framework Convention on Climate Change, the Paris Agreement and their related goals".¹⁶ It should guarantee unrestricted civil society participation and implement guardrails that mitigate risks of future COPs being co-opted to serve private and fossil fuels interests.

The Secretariat should prevent the COP Presidency from being used to advance the presidency's own (fossil fuel industry) interests, using its mandate from existing processes including the Code of Ethics for Elected and Appointed Officers, the Host Country Agreement (HCA) signed with each COP President, the handbook on hosting a COP and the Secretariat guidelines for partnership.

In addition, State Parties should commit to actively tackling issues related to conflicts of interest and undue influence. They should launch a formal process to enhance stakeholder engagement and adopt ambitious instruments to mitigate risks of undue influence. They should put in place strong safeguards to manage conflicts of interest in the elaboration of national positions as well as in the international negotiations.

Two recent announcements by the COP 30 host country, Brazil, seem to indicate recognition of the need for greater integrity for successful climate action and willingness to act. We hope that the announced "global ethical stocktaking"¹⁷ and the

G20 proposal that “anti-corruption be at the centre of policies to combat climate change”¹⁸ can address the findings of this report and begin the implementation of the recommendations listed below.

Integrity over the choice of the host country

Current practice does not prevent unsuitable governments from becoming the hosts of the most important global gathering on climate change and using the COP Presidency to privilege national or specific industry interests over the common good. The COP should follow a more robust process to select host countries:

- In addition to the current logistical, technical, and financial considerations, the Secretariat should assess and report to the Bureau on whether the prospective host country provides a conducive environment for all participants, particularly representatives from observer organisations, to exercise their human rights without fear of intimidation and repercussions, as well as guarantee reasonable costs for participation, thus allowing that concerned groups with limited resources have equal access to negotiations;
- The COP should only consider expressions of interest that have been vetted by the Bureau of the COP, after review and confirmation by the Secretariat that the proposal of the government demonstrates commitment to the goals of the Convention and the Paris Agreement, the purposes and principles of the Charter of the United Nations, and international human rights law before, during and after UNFCCC sessions and mandated events;
- These requirements should be reflected in the handbook on hosting a COP.

Transparency around COP preparations and hosting arrangements

The host country must abide by the UNFCCC’ process for due diligence and criteria¹⁹ for selection of corporate partners. It should only allow sponsorships from entities that demonstrate commitment to the United Nations Global Compact and the United Nations Guiding Principles on Business and Human Rights.

- HCAs must include a commitment to uphold international human rights law

before, during and after UNFCCC sessions and mandated events. This should include immunity of observer organisations’ representatives and other persons from legal process in respect of words spoken or written and any act performed by them, within and outside conference premises.

- The host country should engage in HCA discussions in a transparent way and make the draft HCA available for feedback.
- In line with the June 2023 guidance from the Subsidiary Body for Implementation (SBI),²⁰ HCAs should be published promptly on the UNFCCC website as soon as they are signed.
- HCAs should make the UNFCCC Secretariat’s approval of partners compulsory. Specifically, HCAs should follow the UNFCCC “process for due diligence and criteria for selection of a partner,” and include similar provisions to prevent sponsorship by entities “whose products, services or operations may negatively affect the objectives, activities or reputation of the secretariat, including but not limited to entities whose core products or core related services include fossil fuels.”²¹
- Host deals involving corporations and organisations granted Green Zone partner or exhibitor status must be published on the UNFCCC website so that financial relationships are open to public scrutiny.
- The UNFCCC must establish clear guidelines governing the use of the COP brand in host country initiatives and diplomacy to prevent misuse that could promote endorsement of solutions serving fossil fuel interests or policies that contradict the goals of the UNFCCC and the Paris Agreement.

Accountability of the COP Presidency

The Presidency must be impartial, even if the appointing government has interests that conflict with science-aligned guidance for delivering the 1.5-2 degrees Celsius goal of the Paris Agreement. To preserve this impartiality, the Bureau of the Conference of the Parties (COP) must substantially review the Code of Ethics for Elected and Appointed Officers. Particular attention should be given to Article 14, to include the following:

- the obligation to disclose any situations or relationships, financial or otherwise, that might be perceived as affecting the objectivity and impartiality of the presidency in an interest disclosure form that must be made publicly available on the website of the UNFCCC Secretariat;
 - the incompatibility of the position of president with any role (remunerated or not) and any holding financial or vested interests in an entity whose core products or core related products, services or operations may negatively affect the objectives, activities or reputation of the UNFCCC, including but not limited to fossil fuels;
 - the public disclosure of all formal and informal meetings held in connection to the role of the presidency, with an indication of the topics addressed and attendees;
 - the establishment of a clearly outlined process to deal with arising conflicts of interest and non-adherence to ethical rules;
 - effective rules to enforce the replacement of the president when he or she violates ethical duties.
- The COP should establish a conflict of interest policy that clearly defines a conflict of interest, sets out disclosure requirements, and details how conflicts will be managed. It should ensure that all COP participants, including delegates, observers, and exhibitors, formally agree to abide by this policy as a condition of their participation.
 - All delegations should adhere to the highest standards of transparency regarding whom they invite in their delegations and meetings with lobbyists in preparation for and during COP.

Business responsible engagement

All private sector entities participating in the COP as part of government delegations and observer organisations must adhere to minimum standards for responsible political engagement. In line with the Global Standard on Responsible Climate lobbying²², organisations should publicly disclose:

- the policy issues or regulatory acts related to their lobbying activities, with an indication of their positions regarding the Paris Agreement goal of restricting global warming to 1.5 degrees Celsius above pre-industrial levels;
- their expenditures on lobbying, sponsorships, and other political engagement activities;
- the links to any public policy statements and research sent to public decision-makers, as well as to all transparency registers in which the entity is registered;
- the list of individuals in their senior management, board or in advisory positions who have previously or currently hold, or are otherwise seconded to, a position in government on climate matters or a government delegation to COP.

Transparency and accountability around COP participation

The COP is an international UN space. All information about whom the participants represent, and their reasons for participation, should be made publicly available.

- The UNFCCC Secretariat should improve and enforce transparency requirements for the registration of COP participants, so that their most relevant affiliation is compulsorily declared and publicly released well ahead of the COP. This information should also be made visible during the COP.
- All COP organisers and delegation attendees should be required to declare any significant financial interests in, sponsorship by, or control over entities whose core products or core-related products, services or operations may negatively affect the objectives, activities or reputation of the UNFCCC, including but not limited to fossil fuels.

INTRODUCTION

“As the head of a country rich in fossil fuels, of course, we will defend the right of these countries to continue investments and production because the world needs it,” Azerbaijan’s President Ilham Aliyev said in April 2024 at the Berlin Petersburg Climate Dialogue, an annual event hosted by Germany to lay the groundwork for upcoming climate negotiations.²³

Aliyev’s remarks would have sorely disappointed any of the assembled delegates who hoped that the leader of one of the world’s most fossil-fuels dependent economies would emerge as a bold new climate champion on the world stage.²⁴

In his remarks, Aliyev called oil and gas deposits “a gift from God”, for which Azerbaijan must not be judged. Instead, the Azerbaijani government, which he and his father have led since 1993, “must be judged based on how we use these reserves for the development of the country, to reduce poverty and unemployment, and on what our targets are with respect to the green agenda.”²⁵

Critics of the Aliyev regime have repeatedly complained that corruption and undue influence have concentrated Azerbaijan’s oil wealth in the hands of the ruling elite. Azerbaijan scores just 23 out of a possible 100 on Transparency International’s Corruption Perceptions Index, indicating widespread and deeply entrenched public-sector corruption.²⁶

Azerbaijani citizens enjoy few political rights and civil liberties.²⁷ Human rights activists say there are over 300 political prisoners in Azerbaijan.²⁸ Among them is Dr. Gubad Ibadoglu, a leading human rights defender and economist who has written

extensively about corruption and weak accountability in Azerbaijan’s oil and gas industry. In July 2023, Ibadoglu was arrested on charges of religious extremism and use of counterfeit money. Most observers view the charges as politically fabricated to silence his criticism of the regime.²⁹

“**As the head of a country rich in fossil fuels, of course, we will defend the right of these countries to continue investments and production.**”

President Ilham Aliyev of Azerbaijan

To maintain its grip on power, the Aliyev regime has also relied on corruption overseas. Investigative journalists, prosecutors and civil society organisations have revealed how revenues from Azerbaijan’s fossil fuels production have been used to bribe parliamentarians in Europe – and allegedly in the US – to whitewash the country’s elections and human rights records.³⁰

Similarly, Azerbaijan’s “targets with respect to the green agenda” may not be as impressive as Aliyev would have liked his audience to believe. Evidence presented in this report suggests that the country’s powerful state oil company, SOCAR, is playing a central role in the organisation of the conference at the same time as it pursues a strategy of expansion, facilitated by international oil companies and regional partners. In the view of some analysts,

Azerbaijan's renewable energy projects serve primarily to reduce domestic gas consumption, allowing SOCAR to increase lucrative exports to the European Union.³¹

Meanwhile, Azerbaijan has been accused of "greenwashing" with its renewable energy projects.³² Overall, the country's actions with respect to climate change have been rated 'critically insufficient' by the non-profit Climate Action Tracker project.³³

As host and president of COP 29, Azerbaijan is responsible for furthering the mission of the UNFCCC to accelerate international action to reduce greenhouse gas emissions and keep the Paris Agreement target of 1.5 degrees Celsius warming in sight. It is up to the COP Presidency to develop "a vision for the best possible outcome of the meeting."³⁴

What does it mean for the integrity of this process when the negotiations for climate action are in the hands of a country whose government has declared it will continue to defend the right of countries to continue with new fossil fuels investments and production?

And what does it mean when this statement comes from the president of a country without checks and balances on power, where dissenting voices are silenced and fossil fuel revenues used to fund transnational corruption – all with the support of international oil majors?

What risks does this create for the integrity of the COP process, and what can the international climate, anti-corruption, diplomatic and development communities do to counteract these risks, now and in the future?

With evidence suggesting that Azerbaijan is following similar tactics to COP 28 host the United Arab Emirates and using the COP Presidency as a platform for fossil fuel diplomacy, are we seeing the development of a playbook for fossil fuels exporters that could undermine COPs for many years to come, potentially including COP 30 in Brazil?

This report seeks to answer these questions to support the possibility of bold, evidence-based multilateral climate action across the UNFCCC agenda.

To do so, researchers analysed the available information about Azerbaijan's oil industry and the country's activities as host of COP 29 in the lead-up to the November summit, and set this against both the COP's known vulnerabilities to undue industry

influence and the known risks of corruption, censorship and oppression in Azerbaijan.

The picture that emerges suggests that COP 29 is at risk of being co-opted to further the strategic and financial interests of its host government. The COP itself could become a greenwashing exercise and lose the trust of some Parties, as well as the broader climate community.

The COP 29 organisers did not respond to the authors' request for comment on the findings of this report.

Conflicting Interests at COPs

In the context of the UNFCCC, a conflict of interest occurs where an individual or organisation involved in the negotiation process has competing allegiances that may impact their ability to act in support of the UNFCCC's guiding objective: to stabilise greenhouse gas concentrations in the atmosphere "at a level that would prevent dangerous anthropogenic (human-induced) interference with the climate system."³⁵

Civil society groups have long been pushing the UNFCCC to take a position on conflicts of interests, largely in response to the vast numbers of fossil fuel lobbyists that have attended previous COPs and the risks they pose to the process.³⁶

Each year, the climate NGO Global Witness pores over the provisional delegates list after its release during COP, reviewing corporate affiliations to determine which interests a specific delegate may be advocating for and to identify fossil fuel lobbyists. The UNFCCC could pre-empt this activity by requiring all attendees to disclose any conflicts of interest arising from their employment or business dealings.

Absent such measures, the number of fossil fuel lobbyists in attendance rose to an all-time high of 2,456 at COP28 in Dubai in 2023.³⁷ Nonetheless, the UNFCCC has not yet implemented a clear and effective policy regarding participants' conflicts of interest.

Starting last year, all delegates who attend a COP – whether at the invitation of a Party or observer – are asked to declare their relationship to the government, international organisation, UN agency, NGO or other entity that invited them. However, delegates have the possibility not to disclose their relationship and declare simply "Other" or "Guest." Analysing the list of participants

at COP 28 published by UNFCCC³⁸, we found that more than 16 per cent of all attendees chose not to disclose their relationship – more than 90 per cent of those being on a Party badge. Another 19 per cent indicated “Other” and a further 23 per cent declared themselves simply as “Guest.” All told, therefore, more than 58 per cent of COP delegates did not elaborate on their relationship to the organisation that invited them. This does not necessarily mean that those participants have a conflict of interest, but demonstrates a troubling lack of transparency, which limits access to important information for watchdog groups like media and civil society.

METHODOLOGY

This report was compiled in September and October 2024, based primarily on a qualitative review of public sources available at the time. These sources including books, articles, online databased and reports are cited throughout. For three areas of the report, more complex methodologies and/or data sources were used, as described below.

Conflicts of interest

We used public sources to obtain lists of individuals linked to the organisation of COP 29:

- the COP29 Organising Committee
- the COP29 International Advisory Committee
- the COP29 Presidency Team
- Azerbaijan's delegations to COP 28 in the UAE and to the 2024 UNFCCC intersessional meeting in Bonn

We also compiled a partial list of members of the COP29 NGO Coalition, based on several published screenshots of virtual meetings.

Having compiled these lists, we categorised the individuals by their primary affiliation (business, politics, government or civil society) and added links to their social media profiles and/or Wikipedia entries where available.

We then programmatically searched for information on each individual using public sources – primarily the Azerbaijani and international press – and compiled the results into a central database, recording links between individuals and companies as they emerged. In part, we relied on the data collection tools of Bright Data, provided by the pro-

bono program The Bright Initiative, supporting impact driven projects and organisations.

Oil deals and energy projects

To analyse SOCAR's current activities in Azerbaijan and internationally, we relied on the company's annual reports, accounts from the oil and gas trade press, a report on the Azerbaijani upstream oil and gas sector from the consultancy Wood Mackenzie and information from the NGO Crude Accountability.

For information on current and future renewable energy projects, we used data from Global Energy Monitor's Global Solar Power Tracker and Global Wind Power Tracker, along with TransitionZero's TZ-SAM dataset.

Data on flights taken by the SOCAR corporate jet was obtained from ADS-B Exchange, a community-run project pooling ADS-B data from volunteers.

Lobbying and PR

Our analysis of Teneo's contract with the COP29 Operations Company is based on filings under the US Foreign Agents Registration Act (FARA), published by the US Department of Justice as well as background reporting on the members of Teneo's team working on the contract and their outreach to journalists.

OLIGARCHIC AUTOCRACY & PERSONAL ENRICHMENT

Although the UNFCCC conducts a factfinding mission to prospective host countries to examine logistical, technical and financial readiness for the conference, neither the health of democratic governance nor commitment to goals of the conference appear to be assessed. There are no specific safeguards against corrupt and kleptocratic host governments using the conference for deal-making or self-enrichment. The UNFCCC gives the host country advice on businesses that apply to become corporate partners, but currently does not approve them or set standards for due diligence by the host. While the COP Presidency is expected to liaise closely with the UNFCCC Secretariat on matters regarding formal negotiations in the official UN “Blue Zone,” host countries are largely free to propose their own initiatives for voluntary adoption by governments. Hosts also organise and control access to the “Green Zone” adjacent to the conference.

Azerbaijan scores just 23 out of 100 on Transparency International’s Corruption Perceptions Index, indicating widespread and deeply entrenched public-sector corruption.³⁹ Azerbaijan’s regime has long been highly autocratic, with no signs of political liberalisation. Freedom House scores Azerbaijan with seven out of a possible 100 points.⁴⁰ The Swedish Varieties of Democracy Institute ranks Azerbaijan in the bottom 15 per cent of its liberal democracy index, with a score similar to Russia and South Sudan. And while the country holds elections, these are neither free nor fair, making Azerbaijan an “electoral autocracy”.⁴¹

Rather than liberalising, the current regime seems to be further entrenching itself in power. The current president, Ilham Aliyev, succeeded his father in power in 2003. Initially barred from serving more than two terms, Aliyev won a controversial referendum in 2009 that scrapped constitutional term limits, concentrated power in the executive branch and was rushed through without proper parliamentary or public discussion.⁴² After calling snap elections a year early, Aliyev was re-elected in February 2024 for a fifth consecutive term, this time with 92 per cent of the votes. Over the last year, the regime has further cracked down on independent media and restricted the activities of independent political parties.⁴³

In addition to institutional hardening of the regime, Aliyev has continued to strengthen his hold on power by rewarding loyalists and filling government positions with allies. According to the 2024 Bertelsmann Transformation Index Report for Azerbaijan, “Over the past two years, the president has consistently replaced long-standing senior officials with young and loyal cadres, many of whom have forged their careers in companies associated with the ruling family.”⁴⁴

OIL WEALTH FEUDALISM

As the head of an autocratic state, Aliyev receives direct political benefits from his country’s resource wealth, even before considering potential personal income gains. Vast natural resource revenues likely increase the stability of the non-democratic regime, both by providing material benefits to regime

insiders and by financing government investment and spending in the Azerbaijani economy.

In an entrenched oligarchic autocracy, such as Azerbaijan, much of the economy is based on personal relations to the regime. The rule of law and property rights exist only as far as the regime allows.⁴⁵ The families of the president and first lady (who is also the vice president) control vast amounts of wealth, including PASHA Holding, a conglomerate of firms offering construction, financial, insurance, and many other services. In 2012, the Organized Crime and Corruption Reporting Project's (OCCRP) named Aliyev "Person of the Year" based on "how his family had taken large shares in lucrative industries including the telecom, minerals and construction industries often through government-related deals."⁴⁶ Leaked US State Department cables from 2010 described Azerbaijan as "run in a manner similar to the feudalism found in Europe during the Middle Ages: a handful of well-connected families control certain geographic areas, as well as certain sectors of the economy."⁴⁷ Although construction projects in Baku can be difficult to finish due to "government-imposed delays", firms connected to the regime are unlikely to suffer such setbacks, the diplomats reported.⁴⁸ Since these comments were made, Azerbaijan's score in Transparency International's Corruption Perception Index (CPI) has remained effectively unchanged.⁴⁹

The tightly woven connections between politics, natural resource exploitation, and businesses in Azerbaijan fundamentally threaten the integrity and success of COP 29. In a country where little happens outside the regime's purview, it is not surprising that many members of the COP29 Organising Committee are directly linked to the regime. And many have personal interests that may be in direct opposition to the goals of the UNFCCC. These tensions between public duty and private interests create direct conflicts of interest.

Such conflicts are extremely difficult to detect in Azerbaijan, because the government does not publish information about the assets and liabilities of public officials and their families, or information about the beneficial owners of legal entities.⁵⁰ Nonetheless, intrepid investigative journalists, many of whom have faced imprisonment, abuse or exile, have uncovered questionable deals involving regime figures, many of whom are now part of COP 29.

ORGANISED CORRUPTION?

Investigations by journalists including Abzas Media, an Azerbaijani media outlet whose editors are currently in exile following a crackdown by authorities,⁵¹ allege that multiple members of the COP29 Organising Committee have been involved in corrupt government procurement. An investigation published in March alleged that Balababa Rzayev, president of the state-owned energy company Azerenerji and a member of the committee, awarded contracts for new renewable energy projects and electric grid upgrades in the Nagorno-Karabakh region to companies linked to his family members.⁵²

Many agricultural contracts in the Karabakh region went to firms directly connected to the President's family through PASHA Holding. Ali Naghiyev, head of the president's security services and a member of the COP29 Organising Committee was another beneficiary. A firm with significant overlap in ownership to his family's firms was awarded contracts worth US\$12 million.⁵³ In a previous position, Naghiyev was deputy chief of the Anti-Corruption General Directorate, yet the family was a likely beneficiary of the *Azerbaijan Laundromat* bribery and money laundering operation, and his sons hold an offshore real estate empire.⁵⁴

In a separate investigation, Abzas Media showed that firms connected to Yalchin Rafiyev, deputy foreign minister of Azerbaijan, and now lead negotiator of COP 29, have won government contracts in Karabakh and elsewhere, while also violating environmental rules by illegally removing trees.⁵⁵

Another member of the organising committee is Kamaladdin Heydarov, whose family rivals the president's family in wealth and power. Heydarov ran Azerbaijan's customs service, which has long been dogged by allegations of corruption and, after picking his own successor, became minister for emergency situations, a department with an unusually broad remit.⁵⁶ His family's empire "range[s] from fruit juice production to real estate development" and includes firms closely tied to PASHA Holding.⁵⁷

These instances of alleged personal enrichment of four high-profile members of the COP29 Organising Committee and Presidency Team are likely only the tip of the iceberg and make clear that the personal interests of government members often come first

in Azerbaijan. Members of the Aliyev regime may well use their influence at COP to push for positions and deals from which they will personally gain. Based on the information available, (see below) it appears that the organisation of COP 29 is already being used to promote businesses connected to Azerbaijan's first family and other regime insiders.

Green Partners?

By mid-October, eight companies had been announced as COP 29 "Green Zone Partners," sponsors of the public-access space near the Blue Zone, where the official climate summit takes place.⁵⁸

The partners included SOCAR Green, a subsidiary of the state-owned oil company established by presidential decree a few weeks after Azerbaijan was announced as COP 29 president in December 2023.⁵⁹ According to media reports, the capital assigned to the new renewables-focused subsidiary is US\$16.5 million, or approximately 1.34 per cent of SOCAR's 2023 net profits.⁶⁰

COP 29's "Impact Partner" was announced as PASHA Holdings, a vast Azerbaijani conglomerate spanning finance, construction, real estate, hospitality and retail. PASHA Holdings is owned and controlled by the family of Azerbaijan's first lady and vice president, Mehriban Aliyeva. It is not the first time the company has benefited from its close government ties. Four representatives of PASHA Holdings and Pasha Bank joined Azerbaijan's official government delegation to COP 28 in Dubai.⁶¹

The same announcement revealed that another large Azerbaijani holding company, Azersun Holding, will be the "Sustainable Growth Partner" of COP 29. Azersun's companies operate across retail, construction, food, sports and logistics. This conglomerate is also allegedly linked to Azerbaijan's first family. In 2013, the Offshore Leaks investigation by the International Consortium of Investigative Journalists (ICIJ) and partners revealed that Hassan Gozal, the brother of Azersun Holdings founder and Chairperson Abdolbari Gozal, was listed as the director of three offshore companies established in the British Virgin Islands for the daughters of President Ilham Aliyev.⁶² Eight Azersun Holdings representatives, including Abdolbari Gozal, travelled to COP 28 in the Azerbaijan government delegation.⁶³

Another Green Zone Partner is Silkway West Airlines, an air cargo company previously linked to the Aliyev family, and which is among a group of companies that "have taken over large parts of Azerbaijan's aviation sector," according to investigative journalists.⁶⁴

Partner status at COP 29 presents the companies with a valuable marketing platform. But a large international event like COP creates a variety of other ways to benefit those close to the Aliyev family. Up to 5,000 COP 29 guests will reportedly stay at a Baku seaside resort owned by Emin Agalarov, the former son-in-law of President Aliyev, and the son of Aras Agalarov, a billionaire Azerbaijani real estate developer.⁶⁵ The no-bid contract with the State Housing Development Agency is worth 9 million Manats (approximately US\$5.3 million).⁶⁶ Agalarov announced the contract at an investment forum at his resort attended by three members of the COP29 Organising Committee responsible for the economy, urban planning and tourism in Azerbaijan.⁶⁷

The COP Presidency should represent a diversity of perspectives reflecting broader UNFCCC community. If it is dominated by regime loyalists or a few business concerns, narrow self-interest can take precedence.

In a context where these interests are completely entangled with the fossil fuels industry, that risk becomes potentially catastrophic for a climate summit.

SOCAR'S PROBLEMATIC ROLE IN COP 29

Most fossil fuel lobbyists tend to attend COP as part of trade associations that are formally registered as “observer” organisations. Members of government delegations enjoy much greater access as governments themselves are Parties to the UNFCCC. National oil companies are often considered parts of government, and companies like the State Oil Company of the Republic of Azerbaijan (SOCAR) can in theory have much greater influence over the negotiations. Fossil fuel lobbyists are also often invited by national delegations and given better access to COP proceedings, typically not in a visible manner.

Global Witness calculated that the Abu Dhabi National Oil Company (ADNOC) and its subsidiaries pursued fossil fuels deals worth US\$100 billion while its CEO, Sultan Al Jaber, chaired the COP 28 climate talks, “a five-fold increase on what it pursued in 2022 and significantly more in dollar terms than in the previous four years combined.”⁶⁸

The Azerbaijani government delegation at COP 28 in Dubai included eight SOCAR representatives. Now the Azerbaijani state-owned oil company is playing a decisive role in the organisation of the COP 29 summit. Indeed, the prominent role of SOCAR in Azerbaijan’s state structure and the autocratic nature of the government make it difficult to distinguish SOCAR’s interests from those of the Azerbaijani host government. President Ilham Aliyev himself is a former SOCAR executive. In this context, there is a serious risk of the diplomatic platform created by the COP Presidency being abused to further SOCAR’s business interests.

SOCAR AND THE AZERBAIJANI STATE

It is difficult to overstate the importance of SOCAR both to Azerbaijan’s oil and gas industry and to the country as a whole. In 2023, the company made just over US\$50 billion in revenue, compared to Azerbaijan’s total gross domestic product (GDP) of US\$72 billion, with the vast majority coming from oil and gas sales.⁶⁹ Data from the World Bank comparing the proportion of a countries’ income from natural resources to GDP ranks Azerbaijan 11th in the world, ahead of Kuwait, Qatar and Venezuela.⁷⁰

Yet even with this vast wealth, inequality in Azerbaijan is still roughly two times greater than in its peer countries in Europe and Central Asia.⁷¹ As a national oil company, SOCAR effectively operates as an arm of the state. Ilham Aliyev himself was an executive at the company from 1994 to 2003, immediately before becoming a member of parliament, and the company is still ultimately controlled by a supervisory committee he appoints.⁷²

This past year, SOCAR has already positioned itself at the head of COP 29’s lobbying apparatus. In January 2024, Bloomberg reported that SOCAR executives, including its president Rovshan Najaf, met with US Deputy Special Envoy for Climate Rick Duke at the World Economic Forum in Davos to discuss “critical climate change issues”.⁷³ Several months later, Najaf followed up with further meetings with World Economic Forum officials to in part promote COP 29.⁷⁴ He was one of a small

Jet-setters

Flights taken by SOCAR's corporate jet between 2016 and 2024



Source: ADS-B Exchange; ACDC/TI research

Figure 1: Visualisation of SOCAR corporate jet flights 2016 - 2024

number of top Azerbaijani officials and ministers to meet with International Energy Agency Executive Director Fatih Birol on a trip to outline cooperation in advance of the event.⁷⁵

SOCAR AND THE COP 29 PRESIDENCY

In January 2024, President Aliyev announced the members of the COP29 Organising Committee, a list consisting of 28 men and no women.⁷⁶ After immediate criticism from international media and civil society, the list was revised and at the time of writing consists of 37 male and 18 female members. The changes included the removal of Ruslan Aliyev, the director general of SOCAR's domestic gas distribution division (and of no relation to the president). But if his removal was intended as a concession to climate activists, it was only a limited one.

The most significant SOCAR representative on the current organising committee is Rovshan Najaf, the company's president. Despite SOCAR's tight integration with Azerbaijan's broader governing structures – it is ultimately controlled by the presidential administration – Najaf has more responsibility than any other executive for the company's strategy in both the domestic and the international arenas.

Najaf is a former executive director of Azerbaijan Investment Company – a fund established to support foreign direct investment in the country – and plays a prominent role in SOCAR's international deal-making, a position which makes his presence on the COP29 Organising Committee especially problematic. Azerbaijani and foreign media regularly

carry reports detailing Najaf's visits to foreign capitals to sign agreements relating to both SOCAR's domestic oil and gas projects and to the company's plans for international expansion. These deals have continued since his appointment to the organising committee. In July, Najaf and the CEO of the Italian oil company Eni combined planning for COP 29 with exploration for new hydrocarbon resources in an agreement signed in Baku.⁷⁷

Playing a larger role than Najaf in the organisation of COP is Mukhtar Babayev, Azerbaijan's minister of ecology and natural resources, who will serve as COP 29 president. Babayev worked for SOCAR between 1994 and 2018. He worked initially in marketing and became the company's vice president for ecological affairs, as well as a member of parliament for Azerbaijan's ruling party.⁷⁸ A 2010 account from SOCAR's in-house magazine suggests that the company's environmental priorities at this time focussed on restoring former industrial land.⁷⁹

Having worked for most of his career in the fossil fuel sector, Babayev "has little to no past experience in climate talks", according to a report in Bloomberg⁸⁰ His trajectory resembles that of COP 28 President Sultan Al Jaber, who worked at ADNOC as an engineer before establishing and leading Masdar, the company's renewables-focussed subsidiary.

A 2008 diplomatic cable from the United States embassy in Baku, published by WikiLeaks, documents a revealing conversation with Babayev in which he speaks of the importance of "chang[ing] SOCAR's attitude towards the environment, ensuring that it preserves the environment while fulfilling its mission to develop Azerbaijan's hydrocarbon resources." When asked about the level of financial commitment SOCAR is willing to make to this effort, Babayev "shift[s] the conversation", but nevertheless appears "enthusiastic and in possession of a clear vision of what he hopes to accomplish." The US ambassador concludes that "it remains to be seen if he will provide progress or become sidelined like [the] Minister of Ecology," a role then held by Huseyngulu Bagirov.⁸¹

More than 15 years later, SOCAR's environmental record speaks for itself. A 2022 report by the NGO Crude Accountability describes a litany of environmental issues caused by the company's activities in Azerbaijan, focusing particularly on oil spills and gas flaring, which – given the proximity of the country's oil and gas production to major population centres – also present direct health risks.⁸²

Another member of the COP29 Organising Committee with links to SOCAR is Minister of the Economy Mikayil Jabbarov. He chairs SOCAR's supervisory board, a body which exercises "general management and control over the activities of [SOCAR]" and whose members are appointed directly by the country's president.⁸³ This supervisory board also counts Elnur Soltanov, Azerbaijan's deputy minister of energy and COP 29 chief executive officer, as one of its members.⁸⁴

The involvement of SOCAR executives and board members in COP events is nothing new: at COP 28, the Azerbaijani delegation included no fewer than eight of the company's senior employees, including Najaf and his vice president.⁸⁵ By placing SOCAR executives in key positions of the COP 29 planning process, Azerbaijan risks undermining not only specific negotiations, but the very structure in which those negotiations are set to take place.

Power Plays

Besides the links with SOCAR, the COP29 Organising Committee's membership list raises further questions about the integrity of its members.

Another businessman on the committee is Balababa Rzayev, the current chairperson of Azerenerji, Azerbaijan's largest electrical power producer, and longtime former chairman of Azerishiq, Baku's electrical grid operator. He is joined on the committee by Vugar Ahmadov, Azerishiq's current chairperson. The two companies work closely together.

In March 2022, Abzas Media reported that Azerenerji had awarded lucrative contracts to companies controlled by members of Rzayev's immediate family, including his brother, son and son-in-law. Some of the contracts concerned construction of electrical grid infrastructure in regions of Azerbaijan previously under Armenian control.⁸⁶ The report followed similar allegations levelled at Azerishiq in 2020.⁸⁷

An investigation by OCCRP in May 2024 revealed how Rzayev's son, Fuad Rzayev, struck business deals in the electricity sector with Georgian counterparts, while the elder Rzayev oversaw a massive increase in electricity trade between the two countries. Fuad Rzayev denied his father has

any involvement in the businesses or that they represent a conflict of interest.⁸⁸

In the context of COP 29, with the energy transition set to drive a worldwide boom in electrical grid construction, signs of corruption in this sector in Azerbaijan are particularly concerning.

SOCAR'S HISTORY OF BRIBERY AND UNDISCLOSED PAYMENTS

The conflicts of interest created by SOCAR's participation in COP 29 are troubling enough on their own. Compounding the problem, however, is the company's alleged track-record of bribing foreign politicians to promote the interests of the Aliyev regime. In Europe, Malta's former prime minister Joseph Muscat allegedly discussed receiving kickbacks from SOCAR as an incentive to strike a gas deal with pricing favourable to Azerbaijan.⁸⁹ SOCAR also made illegal political donations to Germany's Christian Democratic Union in 2012, and contributed to German sports and cultural associations during the early stages of the construction of the Southern Gas Corridor pipeline network which brings Azerbaijan's gas to Europe.⁹⁰ A 2018 report by the Parliamentary Assembly of the Council of Europe (PACE) into Azerbaijan's corruptive activity at the Strasbourg human rights body found that the president of SOCAR Ukraine offered one member a bribe in exchange for supporting Azerbaijan's preferred candidate for PACE president.⁹¹

The United States has emerged as another target of SOCAR's illicit influence operations. In 2013, the company used a network of non-profit firms to bring nine members of the US Congress and more than 30 of their staffers to Azerbaijan.⁹² The cost of the all-expenses-paid trip (which included gifts of rugs, silk scarves and crystal tea sets) surpassed US\$750,000; afterwards, several politicians who attended sponsored legislation and amendments supporting Azerbaijan and its energy sector.⁹³ In the end, however, a House Ethics Committee investigations found that members of Congress and their staffers did not "knowingly" violate congressional rules, though the head of the non-profit responsible for organising the trip pled guilty to federal charges of concealing the source of the funding.⁹⁴

'Caviar diplomacy'

European countries where Azerbaijan has been accused of influencing politicians



Source: ACDC/TI research

Figure 2: European countries where Azerbaijan has been accused of influencing politicians

And just this past year, U.S. Representative Henry Cuellar was indicted on charges of accepting over US\$360,000 in bribes from SOCAR from 2014 to 2021 in exchange for advocating on behalf of Azerbaijan in Washington and in his home state of Texas.⁹⁵ Prosecutors allege that the money flowed to Cuellar and his wife Imelda through sham consulting contracts with shell companies set up by Cuellar's wife. Cuellar went on to become one of Azerbaijan's biggest boosters in Congress, co-chairing the Congressional Azerbaijan Caucus, delivering pro-Azerbaijan speeches, and even inserting favourable language into legislation and committee reports.⁹⁶ Former Azerbaijani ambassador Elin Suleymanov was so pleased with Cuellar's work that he exclaimed, "You are the best El Jefe!" Cuellar responded, "Yes sir."⁹⁷

The Cuellars deny all the charges. In his denial, Senator Cuellar stated that he and his wife were innocent and that his legislative actions cited in the indictment were "consistent with the actions of many of my colleagues and in the interest of the American people."

SOCAR's allegedly extensive use of bribes to achieve its international aims exemplifies a broader strategy adopted by Azerbaijan to engage in "caviar diplomacy" abroad. For years, the Azerbaijani

government has embarked on an orchestrated campaign to win foreign influence by bribing and buying off political leaders in exchange for speaking favourably of the Azerbaijani regime.⁹⁸ Lavish trips to Baku and illicit payments were organised for politicians by ostensibly dignified organisations such as the European Azerbaijan Society and the Azerbaijan Cultural Center.⁹⁹

Drawing on leaked documents, OCCRP discovered that Baku had created a US\$3 billion slush fund to finance these activities, funnelling the money through opaque shell companies.¹⁰⁰ The term "caviar diplomacy" itself derives from comments made by a senior Azerbaijani policy maker about "a lot of deputies in the Council of Europe's Parliamentary Assembly (PACE) whose first greeting, after 'Hello', is 'Where is the caviar?'"¹⁰¹

Azerbaijan's boldness in approaching sitting policymakers reached around the world, ensnaring US and European politicians working in national parliaments, prime ministers' offices, and especially pan-European institutions like PACE and the European Parliament.¹⁰²

Figure 2 shows European countries politicians have been accused of benefitting from caviar diplomacy. SOCAR has been suspected in several cases of having provided the finances for the corrupt approaches.

WHAT IS AT STAKE FOR AZERBAIJAN'S FOSSIL FUEL INDUSTRY AT COP?

The UNFCCC states that, “hosting a COP presents a huge opportunity for the host country to promote its approach to climate change solutions.”¹⁰³ Yet, applications to host COP are not vetted by the COP Bureau for commitment to the goals of the UNFCCC and the Paris Agreement. Without improved selection procedures and transparency rules, summits are at risk of being used to greenwash fossil fuel extraction and other high-emissions industries. At the same time, host governments may seek to strike new fossil fuel deals and promote fossil fuel interests and solutions supporting their current business models.

Analysis of Azerbaijan’s energy sector ahead of COP 29 reveals the government’s strategic objectives, which, if pursued under the banner of the COP Presidency, would fly in the face of consensus on how to achieve the goals of the Paris Agreement.

COP 29 comes at a critical time for Azerbaijan’s fossil fuel industry. Europe is desperately seeking new sources of natural gas to replace Russian hydrocarbons. This has the potential to bolster a set of new oil and gas projects in the Caspian Sea that SOCAR is developing with its international partners.

COP 29 is also an opportunity for the Azerbaijan regime to boost the view that oil and gas expansion need not impede climate goals, and that countries can pursue both at the same time. This appears to break with a growing consensus backed by the

International Energy Agency (IEA) and others that the best pathway to meeting the targets in the Paris Agreement is to stop all new oil and gas exploration.

In remarks reported by Politico, Elnur Soltanov, the COP chief executive who sits on the supervisory board of SOCAR, attempted to deflect attention from fossil fuel producers, saying that rather than focussing on curtailing hydrocarbon production, countries should focus on emissions.¹⁰⁴ These remarks appear to imply an unrealistically large role in future energy systems for technologies like carbon capture, utilisation and storage (CCUS), which have yet to be proven at the scales required.¹⁰⁵

Soltanov’s prominent role organising a global climate summit lends his argument credibility, creating a PR opportunity for Azerbaijan (see Chapter 4). Many of SOCAR’s key international partners, particularly those based in Europe, may also see Baku hosting the world’s most important climate summit as an opportunity to legitimise their new joint ventures with SOCAR, potentially greenwashing new oil and gas projects that are inconsistent with the drive to keep warming below 1.5 degrees Celsius.

In this section, we lay out how COP, as both a PR opportunity and a potential forum for oil deal-

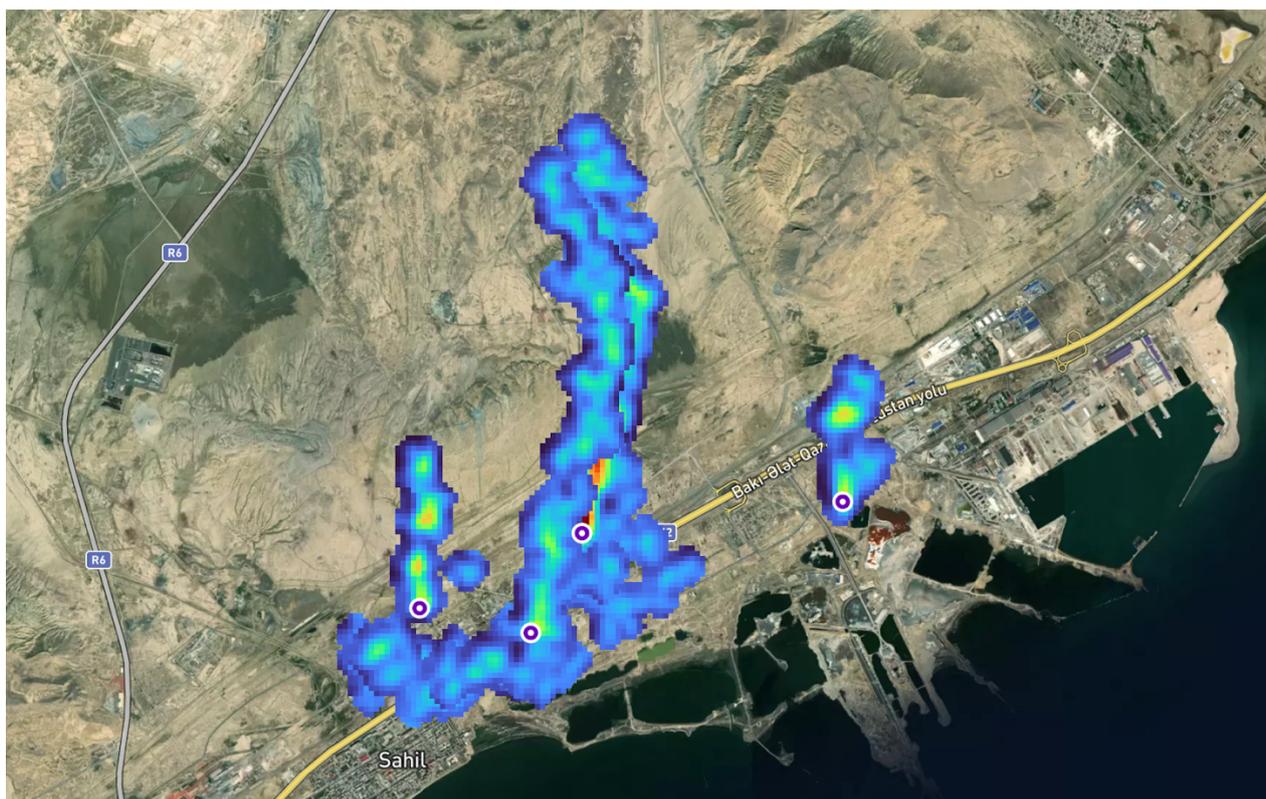


Figure 3: A methane plume near Baku, Azerbaijan, as shown on CarbonMapper.org. (Last accessed on 22 October 2024)

making, runs the risk of emboldening Azerbaijan's fossil fuel industry and undermining the goals of the UNFCCC.

INCREASED EUROPEAN GAS DEMAND

Demand for gas from Azerbaijan has soared because of the EU's decision to wean itself off Russian gas in the wake of the 2022 invasion of Ukraine. In 2022, Baku made a deal with Brussels to increase Azerbaijan's annual gas exports to the EU to 20 billion cubic metres (bcm) by 2027, a target which has since been revised to a still ambitious 16 bcm.¹⁰⁶

While oil production in Azerbaijan has been in decline since around 2010, gas production has continued to grow. Phase Two of the Shah Deniz project – a gas field operated by a joint venture with BP – supplies the newly minted US\$40 billion Southern Gas Corridor pipeline network which takes gas from the Caspian Sea through Georgia, Turkey and into Europe.¹⁰⁷

The risk for Europe, and indeed the world, is that a short-term need for new sources of gas may lead to an unnecessary expansion of oil and gas development inconsistent with keeping warming below 1.5 degrees Celsius, and to dependency on another gas supply that can be weaponised by an

autocratic regime with little regard for international law.

As part of this expansion, work took place in September 2024 at the Greek-Turkish border to boost the capacity of the Trans-Adriatic Pipeline.¹⁰⁸ Earlier this year, Azerbaijan also signed a cooperation agreement with Turkey to send more gas from Turkmenistan to Europe.¹⁰⁹

The EU is also exploring a deal with Baku and Kyiv to let Azerbaijani gas flow through pipelines that currently carry Russian gas to Europe. The current Russia-Ukraine gas transit deal expires at the end of 2024.

The demand from Europe for more gas also appears to have sped up new gas exploration that was already underway in the Caspian Sea. Whereas SOCAR and BP had already agreed in 2018 to jointly explore the D230 frontier block over 25 years, and the first profitable hydrocarbons may not be produced for many years to come.¹¹⁰ In more recent developments, BP began drilling two new gas exploration wells on the Shah Deniz and Azeri-Chirag-Guneshli fields in 2023, with the latter yielding new gas reserves.¹¹¹

More Gas, More Problems?

As Azerbaijan produces ever-larger volumes of gas for the European market, the environmental consequences are still unclear. Methane emissions are a major area of concern. A recent study by Global Witness found that gas flaring at Azerbaijan's onshore and offshore oil and gas installations – a significant source of methane, as well as particulates that are dangerous to human health – had increased by 11 per cent since 2018, when the country last reported methane emissions data to the UN.¹¹²

Newly published satellite data also gives cause for concern. The data, derived from measurements taken by instruments on board the International Space Station and the German EnMAP satellite in April, June and August 2024, shows large methane plumes emerging from several locations in the dense cluster of onshore oil and gas infrastructure south of Baku (see Figure 3).

Initial analysis of the data suggests that most of the emissions stem from the Garadagh Underground Gas Storage facility. SOCAR did not respond to a request for further information on the plumes.

DOMESTIC UPSTREAM EXPANSION

International oil companies are integral to Azerbaijan's upstream and midstream oil and gas sector, and several of them with stakes in Caspian Sea exploration and production stand to benefit from Europe's rush for new sources of gas.

Some of this gas may come from new projects such as BP's D230, which is still in the exploration phase. The expansion isn't limited to gas, however: on 20 September 2024, less than two months before the beginning of COP 29, BP and SOCAR signed a new memorandum of understanding for development of the Karabagh oil field.¹¹³ Any production of oil and gas from new fields jeopardises climate goals. As International Energy Agency Executive Director Fatih Birol has said, "the pathway to net zero is narrow but still achievable. If we want to reach net zero by 2050 we do not need any more investments in new oil, gas and coal projects."¹¹⁴

BP is far from the only international oil company in Azerbaijan. For the majority of contracts for the major Azerbaijan deposits, SOCAR has a production

sharing agreement in place with at least one other international partner. This makes Azerbaijan a valuable source of revenue for several of the world's largest oil and gas companies. SOCAR currently has production sharing agreements with oil and gas heavyweights including TotalEnergies, ExxonMobil, ADNOC and Lukoil.

Azerbaijan has no competitive bidding for oil contracts, meaning that participating international oil companies trade heavily on their relationships with the Azeri regime and SOCAR.¹¹⁵ International firms with stakes in Azerbaijan's oil and gas sector may see COP 29 as an opportunity to ingratiate themselves with the Azerbaijani regime and SOCAR to protect their existing assets and to cut new deals. It is critical that SOCAR and its international fossil fuel interests are not allowed to dominate and derail this year's COP.

A Time to Celebrate?

BP is by far the most significant international oil company in Azerbaijan and has substantial and long-running interests in the major oil and gas blocks and key international pipelines. It is no passive investor either. BP physically operates both the Azeri-Chirag-Guneshli (ACG) oil and Shah Deniz gas-condensate fields, two of the most important hydrocarbon projects in the country. It also operates the Azerbaijani and Georgian sections of the Baku-Tbilisi-Ceyhan (BTC) oil pipeline and the entirety of the Baku-Supsa (Western Route) oil and South Caucasus gas pipelines — critical pathways through which Azeri hydrocarbons reach international markets. BP is Azerbaijan's largest foreign investor and has a close relationship with the Azerbaijan government going back to the 1990s.

BP has pushed for new frontier exploration in the Caspian Sea while fawning over Azerbaijan's ruling family and celebrating the massive amount of oil and gas extraction it has benefited from over the previous three decades.

In the run up to COP 29, BP's Azerbaijan subsidiary has been keen to laud its mega-extraction projects in the Caspian Sea. At the end of December 2023, BP issued a press release celebrating the billionth barrel of crude oil produced from the West Azeri offshore platform.¹¹⁶ West Azeri is part of the multi-billion-dollar Azeri-Chirag-Gunashli (ACG) oil field that BP shares with several other companies, most importantly SOCAR.

Earlier that month, Bakhtiyar Aslanbayli, BP's vice president of communications and external affairs for the Caspian region, published a glowing social media post celebrating the upcoming 30-year anniversary of the "Contract of the Century" signed by BP and Heydar Aliyev – the former president of Azerbaijan and father of the current head of state Ilham Aliyev – to develop the ACG field.¹¹⁷

Aslanbayli's references to "the Great Leader" Heydar Aliyev indicate the deference oil companies show to Azerbaijan's ruling family. With so many current and future projects at stake in Azerbaijan, BP and other companies appear likely to act as powerful allies in the COP Presidency's campaign to defend the rights of producing countries to continue fossil fuel extraction.

SOCAR'S REGIONAL EXPANSION

Azerbaijan is not just expanding its domestic oil and gas production. Through SOCAR, it is growing its portfolio of oil and gas projects abroad. New regional partnerships exacerbate the risk that COP 29 will become a platform for fossil fuel deal-making rather than a place for real climate diplomacy.

Azerbaijan's maritime neighbours are of particular interest to SOCAR since the 2018 treaty partly settling the states' contested claims to the Caspian Sea and opening up further opportunities for extracting its vast underwater hydrocarbon resources.¹¹⁸ In June 2024, SOCAR Vice President Babak Huseynov told reporters: "We are working with Kazakhstan, Turkmenistan, and Iraq to participate in oil projects. However, the public will learn about the results only after the contracts are signed."¹¹⁹ Open-source information provides significant additional context about SOCAR's relations with Azerbaijan's neighbours.

Kazakhstan

On 11 March 2024, Kazakhstan's president Kassym-Jomart Tokayev made a state visit to Azerbaijan, accompanied by Magzum Mirzagaliyev, chairman of the board of KazMunayGas (KMG), the country's national oil and gas company.¹²⁰ In addition to signing an agreement with SOCAR to increase the volume of Kazakh oil pumped to Europe through the BTC pipeline, Mirzagaliyev gave an interview to the Trend News Agency in which he revealed that KMG had invited SOCAR "to explore opportunities in

geological exploration [for new hydrocarbon resources] in Kazakhstan."¹²¹

Mirzagaliyev was followed in July 2024 by Askhat Khassenov, KMG's CEO, who visited Baku to discuss "key cooperation issues" with Najaf and colleagues.¹²²

KMG's 2023 annual report provides a clear sense of the company's priorities, citing the development of a "[r]esource base sufficient to support the Company's growth" as a key strategic goal.¹²³ This programme of work consists largely of exploratory drilling for new oil and gas deposits, both onshore and in Kazakhstan's section of the Caspian Sea.¹²⁴

With potential assistance from SOCAR, these hard-to-recover resources will significantly boost Kazakhstan's oil production at a time when experts – and some international oil companies – have warned of an imminent peak in global oil consumption.¹²⁵ In August 2024, having analysed its reserves, KMG estimated that improvements in technology would lead to production of an additional 70 million barrels of oil between 2025 and 2050.

The list of in-person participants at COP 28 shows no fewer than five representatives from KMG attending as part of the Kazakh delegation. Assuming a similar level of attendance at COP 29, many ingredients for high-level deal-making would be in place.

Turkmenistan

Arguably, the state which stands to benefit the most from the 2018 Caspian Sea treaty – and improving relations with Azerbaijan more generally – is Turkmenistan. A border dispute between the two countries has prevented the development of a large oil field known as Dostluk, which lies to the east of Azerbaijan's current major offshore projects in the Caspian Sea, crossing the border with Turkmenistan.

In 2021, after many years of diplomatic wrangling, Azerbaijan and Turkmenistan signed a preliminary agreement to jointly develop the field.¹²⁶ This was followed in November 2023 by the opening of a SOCAR office in Ashgabat, with Azerbaijani Economy Minister Mikayil Jabbarov – a member of the COP29 Organising Committee – saying the event "signifies our confidence in the long-term collaboration with Turkmenistan, anticipating mutual benefits in the energy sector for both countries."

Solving the border dispute and developing the Dostluk field has the potential to reinvigorate long-dormant plans for a Trans-Caspian Gas Pipeline from Turkmenistan to Azerbaijan, allowing European markets to access Turkmenistan's enormous gas reserves. With diplomatic obstacles apparently removed, the project's key hurdle now is financing, particularly given new restrictions on using EU funding for fossil fuel projects, as Aliyev himself recently pointed out a COP 29-branded press conference.¹²⁷¹²⁸

Like Kazakhstan, Turkmenistan fielded a substantial team of fossil fuel executives at COP 28, consisting of six representatives from its state-owned enterprises Turkmengas and Turkmenoil. The delegation included both the head of Turkmengas and the CEO of its subsidiary TAPI Pipeline Company Limited, which is building a pipeline to Afghanistan, Pakistan and India.

Given the increasing alignment of economic interests between the various Caspian states and the EU, and the potential for a substantial pay-day for the current licence-holder, development of the Dostluk field and the proposed Trans-Caspian Gas Pipeline should both be seen as high-risk areas for fossil fuel deal-making at and around COP 29.

Iraq

SOCAR's final area of potential upstream expansion is in Iraq, where huge oil reserves – the fifth largest in the world – remain undeveloped.

In 2022, following several high-level visits to Baku, the state-run Iraqi Drilling Company (IDC) signed a partnership with SOCAR for drilling and oil field services.¹²⁹ The three-year deal is set to expire in 2025, and its renewal may therefore be a key priority for Iraqi delegates at COP 29. Perhaps more significantly, SOCAR may seek an ownership stake in one or more of Iraq's oil and gas fields, either individually or as part of a consortium.

In 2023, the French oil major TotalEnergies – a key partner of SOCAR's in the Caspian Sea – closed a US\$27 billion energy deal with the Iraqi government and partner QatarEnergy.¹³⁰ The news followed a significant downsizing of other oil majors' operations in the country. While press for the deal – named the Gas Growth Integrated Project (GGIP) – has focussed on plans to improve the country's electricity supply by capturing and using flared gas, the programme of work also includes plans to “increase regional oil production” by injecting desalinated seawater into wells.¹³¹

Iraq received a delegation from Azerbaijan – including COP29 Organising Committee members Mikayil Jabbarov and Rovshan Najaf – in Baghdad on 18 March 2024.¹³² According to flight data from ADS-B Exchange, the high-level visit occurred just five days after a trip to Baghdad by a corporate jet owned by TotalEnergies and frequently used by CEO Patrick Pouyanné.¹³³

While Iraq's delegation to COP 28 appears “cleaner” than those of Azerbaijan's Caspian neighbours, it is notable that the group included two representatives from the country's board of investment, responsible for promoting foreign direct investment in the country.

AZERBAIJAN'S PROGRESS IN RENEWABLES

Azerbaijan is aiming to increase the share of renewable energy sources – principally utility-scale solar and offshore wind – in its installed electricity generating capacity to 30 per cent by 2050.¹³⁴

Calculations of capacity use energy sources' theoretical maximum output. As photovoltaic cells and wind turbines are intermittent sources with significantly lower capacity factors than gas turbines, 30 per cent of installed capacity may produce a significantly lower percentage of total electricity supply.

Even with this caveat, Azerbaijan has made significant progress in renewable energy projects in recent years. However, analysis of developments in solar and wind power shows how tightly integrated their deployment is with Azerbaijan's broader system of fossil fuel extraction, with plans to use renewables to provide power to energy-intensive oil and gas production processes.¹³⁵

Solar power

Azerbaijan's climate and landscape make it well suited for solar energy. According to figures from the Ministry of Energy, the country's technical solar potential is around 23 gigawatts (GW).¹³⁶ By contrast, a recent bottom-up analysis of global solar deployment using satellite imagery puts the country's total installed capacity at less than 0.3 GW.¹³⁷

Azerbaijan has only one operational utility-scale solar facility, the 230-megawatt (MW) Garadagh plant. Garadagh (formerly known as Area 60) was built by Masdar, a renewables-focussed subsidiary of the UAE's state oil company ADNOC, whose

website boasts that the facility will power 110,000 homes.¹³⁸

The Shafag project is another large solar farm under development by SOCAR and BP on territory taken by Azerbaijan from Armenian forces in 2020. Shafag will supply electricity to the local grid, reducing the need for gas-fired generation. At the same time, BP will convert parts of its Sangachal oil and gas terminal near Baku to run on electrical power, resulting in a net reduction in the amount of gas used for electricity generation in Azerbaijan.¹³⁹

As the NGO Crude Accountability has pointed out, this move to save gas appears to have been made with an eye toward Azerbaijan's export commitments.¹⁴⁰ Speaking in 2022 in the town of Shusha, which Azerbaijan gained control of less than two years earlier, BP's regional president for Azerbaijan stated explicitly that the electrification of Sangachal would allow the company to "export the displaced gas through SGC [the Southern Gas Corridor]."¹⁴¹

In addition to Garadagh and Shafag, there are three major solar projects totalling 1.16 GW in early stages of development by Masdar and Nobel Energy.¹⁴²

Wind power

According to data from Global Energy Monitor, Azerbaijan currently has just one operational wind farm, the 50 MW onshore Yeni Yashna project located north of Baku.¹⁴³ Three other onshore projects totalling around 500 MW of installed capacity are currently under construction by SOCAR, Masdar and the Saudi Arabian company ACWA Power.¹⁴⁴

Analysts see the vast majority of Azerbaijan's potential wind energy – up to 157 GW of technical capacity by some estimates – offshore in the Caspian Sea.¹⁴⁵ To tackle the technical and financial challenges of exploiting this resource, the Azeri government has published a long-term plan under the World Bank's Energy Sector Management and Assistance Program.¹⁴⁶ In addition to setting long-term targets, Azerbaijan's offshore wind plan appears to set the stage for continued dominance of the country's energy system by a small handful of fossil fuel companies. The plan states explicitly that bidders for the development of offshore wind projects "will require experience in both [offshore wind] project development (from other markets) and in Caspian Sea project execution (through hydrocarbon activities)." These criteria strongly

favour large European oil companies like BP and TotalEnergies.¹⁴⁷

Azerbaijan already plans to use solar energy to decarbonise elements its midstream oil and gas industry. The management of a major roll-out of offshore wind projects in the Caspian Sea by international oil companies risks similar effects, powering an increase in oil and gas production and further entrenching the region's position as a zone of extraction and environmental damage.

The key for Azerbaijan – as with any oil-producing country, including those in the Global North – is to phase out upstream oil production while implementing renewables in a way that powers both the needs of everyday people and the industries of the future.

SMOKE & MIRRORS? CIVIL SOCIETY & MEDIA ENGAGEMENT

The UNFCCC formalises the role of civil society groups as “observers,” enabling them to participate and attend COPs once their application has been granted by the UNFCCC Secretariat. The UNFCCC Secretariat is also responsible for approving applications for media accreditation. Civil society groups – particularly those representing traditionally marginalised groups such as Indigenous people or low-income populations – often give voice to those most directly affected by the current impacts of climate change and are a critical constituency in any attempt to realise a just transition, even if they often don’t have a formal seat at the negotiation table.

Given the risks of hosts using COPs to whitewash their human rights records and co-opt the summits for their own interests, it is vital that the host country guarantees the active participation as observers of truly independent, non-governmental civil society before, during, and after COP. Civil society activists and media organisations provide an essential check on the powers of governments and companies that traditionally have influence at COP. The ability of these groups to express themselves freely, contribute to solutions and highlight issues is essential to realising the desired ambitions of climate negotiations, ensuring key voices are heard, and preserving the integrity of COP. This also includes guaranteeing no obstacles to participation, including indirect ones like unaffordable accommodations.

As Amnesty International has already argued, the Host Country Agreement (HCA), which the UNFCCC

is yet to officially release for COP 29, should contain guarantees that all human rights will be protected and respected by the COP hosts.¹⁴⁸ Human Rights Watch has obtained and published a copy of the COP 29 HCA, though it is missing annexes that provide important detail on the arrangements between the UNFCCC and Azerbaijan.¹⁴⁹ The HCAs for both COP 28 and COP 29 prohibit participants from interfering in the “internal affairs” of the host country – a troubling clause in contexts where human rights and free speech are under attack.

As discussed in Chapter 2, no true independent civil society exists in a non-democratic regime such as Azerbaijan. The fact that the Azerbaijan regime routinely silences activists and journalists through imprisonment and detention makes the full publication of the COP 29 HCA document and clarity on these matters all the more urgent. In June, Human Rights Watch identified 25 cases of Azerbaijani journalists and activists being silenced in the preceding 12 months.

Based on the information available, however, the COP 29 Presidency appears to be setting up two parallel processes to exert influence over these critical watchdogs.

THE COP29 NGO COALITION

On 10 September, several members of the COP 29 Presidency Team, including President-designate Mukhtar Babayev, joined a video call with members of the COP29 NGO Coalition, a newly formed collection of civil society organisations from Azerbaijan and abroad.¹⁵⁰

The COP29 NGO Coalition was convened by the National NGO Forum, whose main partner is the government's Agency for State Support to Non-Governmental Organisations. That agency was created, and its board members are appointed, by presidential decree.¹⁵¹

The executive director of the Agency for State Support to Non-Governmental Organisations is a member of the COP29 Organising Committee. In June, the National NGO Forum and Agency for State Support to Non-Governmental Organisations organised a meeting between NGO representatives and SOCAR to discuss SOCAR's green energy agenda.¹⁵²

The COP29 NGO Coalition sits outside the formal UNFCCC process for participation by civil society and has been promoted by Azerbaijani media in the run-up to the event. While the process for joining the coalition is unclear, and the organisers have not published a list of member organisations, a recording of a meeting posted on YouTube, and several screenshots of virtual meetings published by the National NGO Forum allow us to identify some participants.

Several participating NGOs appear to have close ties to the Azerbaijani state.

Among those present on calls are representatives from two closely linked Geneva-based groups: the Institute for Rights and Development – Geneva (IRDG) and the Global Institute for Water, Environment and Health (GIWEH).¹⁵³ IRDG and GIWEH have been vocally supportive of Azerbaijan in recent years, particularly on two issues that relate to the conflict with Armenia: the clearing of landmines in territories formerly controlled by Armenia, and pollution of the Okhchu river with waste from Armenian industrial operations.

In December 2022, IRDG organised a 'protest exhibition' about the landmine issue outside the United Nations office in Geneva displaying signs criticising "Armenian War Crimes." The protest was promoted on the website of the State Committee on Work with Diaspora of the Republic of Azerbaijan.¹⁵⁴ The organisations' joint events have been reported extensively in the Azerbaijani media, as have their written submissions to the UN's Human Rights Council.¹⁵⁵

Another organisation attending meetings of the COP29 NGO Coalition – and which appears to be part of the same loose network as IRDG and GIWEH – is the International Eurasia Press Fund (IEPF). Purporting to support a thriving media sector in

Azerbaijan – which ranks in position 164 out of 180 countries in the World Press Freedom Index by Reporters without Borders¹⁵⁶ – the organisation consistently takes a strongly pro-Aliyev position in public outputs. These include a report on the country's February 2024 presidential elections, in which the group accuses independent OSCE monitors of bias and whitewashes the activities of the ruling party.¹⁵⁷ IEPF has planned joint events with IRDG on Nagorno-Karabakh and signed a formal cooperation agreement with GIWEH.¹⁵⁸ Its head, Umud Mirzayev, also sits on the board of the Azerbaijan Press Council, an organisation which local journalists have called "meaningless" due to its adoption of pro-regime positions.¹⁵⁹

IRDG, GIWEH and IEPF did not respond to requests to comment on their relationship with each other and their apparent history of taking positions that support Azerbaijan's domestic and foreign policy goals.

The COP29 NGO Coalition appears to include participants with direct links to the Azerbaijani government. These include Azer Allahveranov, whose biography on X describes him as chairperson of the Eurasian Migration Initiatives Platform.¹⁶⁰ According to his LinkedIn profile, Allahverov served for eight years as chairperson of the State Migration Service of the Republic of Azerbaijan's Public Council, a body which engages with the government on migration issues.¹⁶¹ Allahveranov sits on the Supervisory Board for the Agency for State Support to NGOs, a position to which he was appointed by President Ilham Aliyev, and was elected to parliament in Azerbaijan's recent parliamentary elections. His social media profiles are full of appearances on state television and statements which are highly supportive of Azerbaijan's COP 29 presidency.

Organisations which campaign on the central challenge of climate change – reducing global dependence on fossil fuels – appear to be grossly underrepresented, if not completely absent, from the Coalition, as well as from other initiatives organised by the NGO Coalition. The UNFCCC's handbook for COP hosts states that they should: "pursue a broad stakeholder engagement strategy based on transparency, openness and inclusiveness."

The National NGO Forum and COP 29 organisers did not respond to requests for comment on the membership, purpose or approval process of the COP29 NGO Coalition.

In many ways, the COP29 NGO Coalition resembles the “BTC Support and Monitoring International Public Coalition”, established by the National NGO Forum in 2002 to promote the development of the Baku–Tbilisi–Ceyhan (BTC) oil pipeline by countering legitimate criticisms from local and international environmental and human rights NGOs.

According to a 2014 account from Azeri media, sympathetic to the government:

“In 2002, the National NGO Forum established the “BTC Support and Monitoring International Public Coalition” [*BTC-yə dəstək və monitoring beynəlxalq ictimai koalisiyası*] in order to neutralise [*neytrallaşdırmaq*] the activities of 64 foreign NGOs covering more than 30 countries of the world, which purposefully started the “Anti BTC” coalition.”¹⁶²

As James Marriott and Mika Minio-Paluello note in *The Oil Road*, a 2012 book on the pipeline and the campaign against it, the pro-pipeline coalition was led by Sabit Baghirov, a high-level SOCAR executive with significant responsibility for delivering the pipeline itself.¹⁶³

The National NGO Forum did not respond to a request for comment.

More recently, Azerbaijan has been accused of leveraging civil society and environmental issues over the 2022–23 blockade of the Lachin Corridor, when a protest by dozens of state-affiliated NGO workers – alongside military personnel, civil servants and youth organisations – blocked the only exit route from Armenian-controlled territories in Nagorno-Karabakh.¹⁶⁴

It is unclear to what extent membership of the COP29 NGO Coalition allows organisations to influence the priorities of the presidency. Azerbaijan’s draft initiatives had already been circulated before the video call attended by the presidency team. On the call, Shahriyar Hajiyev, an Azerbaijani diplomat responsible for outreach to observer organisations, encouraged participants to follow the website of the COP 29 Presidency and send written proposals and amendments for consideration. He also appeared to encourage coalition members to find ways around the UNFCCC accreditation process, telling the call: “We would like to encourage the NGOs that don’t have observer status to learn the procedures from the UNFCCC Secretariat. There can be other possibilities for them. For example, through cooperation, they can receive quotas from international partners and receive badges and participate at COP 29.”¹⁶⁵

STRATEGIC PR BLITZ

COP Host Country Agreements regulate media services and operations by the UNFCCC and the host government. The Agreement with Azerbaijan has not been officially released, and the version obtained and published by Human Rights Watch does not include the relevant annex detailing responsibilities for media and communications. However, in the previous agreement with the UAE, the UNFCCC communications team is responsible for “strategic communications, including communications policy, coordination on media issues with the COP President, briefings... preparation of press releases, press reviews” and other communications functions related to people and processes within the UN system. The host government, meanwhile, is expected to appoint a communications liaison officer that helps promote the conference in local and international media interest and issue accreditations.¹⁶⁶

In practice, however, the line between a neutral convenor promoting the agenda of the conference, and a nation state promoting its own image on the world stage can easily become blurred. When the host nation is an authoritarian petrostate with an interest in pursuing fossil fuels expansion, these conflicting agendas can become particularly problematic.

The loud criticism of the UAE as COP 28 host seems not to have been lost on Azerbaijan. To manage the impending scrutiny, the COP 29 organising team sought professional help. Beginning on 1 February, 2024, the COP 29 Presidency began employing the services of Teneo, one of the “Big Four” firms working globally in strategic communications.¹⁶⁷ Teneo has represented a small number of foreign clients in the United States over the last five years, including many powerful organisations and companies in the UAE, Saudi Arabia and other authoritarian petrostates. Azerbaijan is next in line to tap this expertise to improve its international reputation and advance its agenda in the run-up to COP 29.

The contract Teneo signed with COP29 Azerbaijan Operations Company is worth US\$4.7 million with a monthly retainer of US\$475,000 and one-time payments of US\$1.425 million and US\$950,000 for its work in May and June.¹⁶⁸ Since the COP 29 team is considered a foreign entity in the United States, Teneo is required to regularly file as a foreign agent under US law for any lobbying or promotional

activities it conducts in that country. These filings provide incredible insight into the nature of the Azerbaijani PR blitz surrounding COP 29, including the nature of the contract, outreach activities, expenses, and personnel. For example, its latest FARA filing shows that in the six months from February to July 2024, Teneo racked up more than US\$550,000 in expenses, including airfare, hotels, meals, and other consulting fees.¹⁶⁹

This contract engages Teneo in the direct planning and promotion of COP 29 in Baku. According to its FARA filing from 30 August 2024, Teneo has helped “to establish the COP 29’s communications function, including narrative development, initial content development, communications and engagement campaign planning, issues management, organisational development, establishing media relations capability, and media training.”¹⁷⁰ Other activities include polling and mapping stakeholders.

Some of that content may have included drafting the speeches COP 29 President Mukhtar Babayev gave to the Petersberg Climate Dialogue in Berlin on 25 April 2024 and that COP 29 Lead Negotiator Yalchin Rafiyev delivered to the Bonn Climate Change Conference on 10 June, 2024. The texts of both addresses appear as “Informational Materials” submitted as separate FARA filings.¹⁷¹ Though it is possible that Teneo was only distributing the speeches to journalists ahead of the meetings, their inclusion in the FARA filings may also indicate Teneo helped develop their content.

Teneo did not respond to a request for comment.

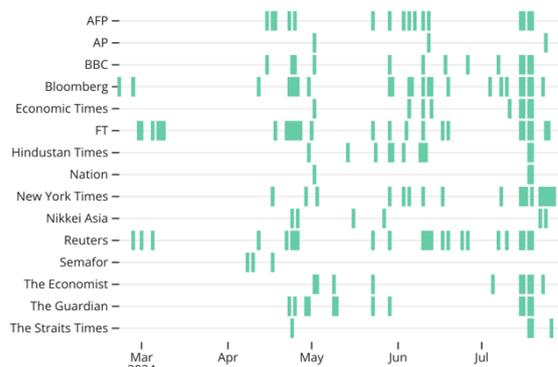
Perhaps the most striking details in Teneo’s FARA filings on behalf of the COP29 Azerbaijan Operations Company involve its extensive outreach to journalists from around the world to promote Baku’s agenda for the COP 29 event. In its two filings so far in 2024, Teneo documents 505 unique approaches to journalists.

Figure 4 visualises this outreach for the top 15 media outlets targeted, with each coloured line indicating an email, text message, or other communication sent from Teneo between 1 February 1 and 31 July (the last date for which we have data).

The detailed nature of the outreach descriptions suggests that Teneo assisted in setting up at least 10 interviews for COP 29 President Mukhtar Babayev, Lead Negotiator Yalchin Rafiyev and COP 29 CEO Elnur Soltanov with major international news outlets from March to the end of July.¹⁷² One interview

Teneo’s COP 29 PR blitz

Contacts between Teneo and the 15 publications it has most actively targeted



Source: US Department of Justice FARA filings

Figure 4: Visualisation of Teneo’s outreach to 15 media outlets 1 February – 31 July, 2024.

from July was with Azerbaijan’s ambassador to the Netherlands, Rahman Mustafayev, who later co-convened a conference on COP 29 at The Hague in September.¹⁷³ Messages to journalists also appear to include numerous invitations to join media trips to Azerbaijan, exclusive briefings with COP 29 organisers and the dissemination of talking points.

The articles produced tend to focus on the COP 29 Presidency’s priority of convening a summit focused on climate finance.¹⁷⁴ Azerbaijan’s geographic location and status as an oil-producing developing country is framed as an opportunity to bring the global North and South together to negotiate new monetary commitments. However, several interviews also give Azerbaijan’s officials a platform to defend their own energy policies.¹⁷⁵ In these articles, continued fossil fuel expansion driven by European demand for gas is presented as a necessary part of the green energy transition.

Largely missing from the articles generated by Teneo’s campaign is mention of Azerbaijan’s human rights record, autocracy, corruption and kleptocracy. Azerbaijani officials’ stated commitment to inclusivity and transparency goes unchallenged by examples of the government’s normal practice.

The Quincy Institute for Responsible Statecraft has raised concerns about the Teneo campaign for the COP29 Azerbaijan Operations Company, suggesting that it may be engaging in “peacwashing” by promoting a “COP Truce” initiative, while the conflict with neighbouring Armenia remains formally unresolved.¹⁷⁶ As noted in that article, COP 29 President Babayev used an appearance on Azerbaijani TV to laud Teneo’s success in changing international perceptions of Azerbaijan, saying “Now

they all understand and see the strength of our country.”¹⁷⁷

Responsible Statecraft also highlighted an apparent breach of Teneo’s obligation to register as a foreign agent before beginning work for the foreign government. The PR campaign began in February, but Teneo only registered in June. Teneo did not respond to a request for comment from the authors of this report.

The latest FARA filing also listed 16 persons from six different countries actively working on behalf of the COP29 Azerbaijan Operations Company, including Geoff Morrell, Teneo’s president of global strategy and communications. Prior to joining Teneo in 2023, Morrell had worked at British Petroleum (BP) from 2011 to 2022, ending his time there as executive vice president of communications and advocacy.¹⁷⁸ At BP, Morrell helped rebuild BP’s reputation following the Deepwater Horizon oil spill, where he led a risky strategy to be the “villain playing the victim” in order to reduce what BP viewed as fraudulent liability claims.¹⁷⁹ At Teneo, Morrell led a controversial US\$2.7 million contract with the Saudi Public Investment Fund to manage the public relations around the LIV golf tour’s partnership with the PGA.¹⁸⁰ Teneo CEO Paul Keary was later called to testify at a US Senate permanent subcommittee about this work, explaining why the firm – along with three other consultancies – failed to hand over documentation to assist the committee’s investigation.¹⁸¹

Another high-powered Teneo employee involved in work on COP 29 is Senior Managing Director Alex Hickman. According to his LinkedIn profile, Hickman – originally a journalist – joined Teneo in November 2022 after working for more than two years as a special adviser on business issues to former UK prime minister Boris Johnson.¹⁸² The move was scrutinised by the UK’s Advisory Committee on Business Appointments and led to criticism in the media over the apparent “revolving door” between government and the private sector.¹⁸³ Hickman’s work at Downing Street, which followed a stint with the successful Vote Leave campaign for Britain to leave the European Union, coincided with the UK’s hosting of COP 26 in Glasgow.

Employing Western public relations to beef up the regime’s image has long been a favoured tactic of President Aliyev. Data from OpenSecrets shows that the Azerbaijani government spent nearly US\$8.5 million between 2016 and 2023 on lobbying its interests in the United States alone. That cash helped finance an elaborate campaign to bolster

support for Azerbaijan’s actions in Nagorno-Karabakh (including contacting US congressional offices more than 1,000 times in the first half of 2023).¹⁸⁴ In the EU, this PR blitz may have included sponsoring favourable coverage on the website *EU Reporter*, which regularly featured articles “effusive in their praise for Baku.”¹⁸⁵

What is new is the size of the single contract with Teneo and the powerful communications and human resources being dedicated to shape the image of Azerbaijan through its hosting of COP 29. The total budget Azerbaijan has allocated to just this one public relations campaign rivals what it contributed to the UNFCCC just to host the conference. According to the copy of the COP 29 Host Country Agreement obtained by Human Rights Watch, Azerbaijan paid UNFCCC around US\$5.8 million to “bear the actual additional costs directly or indirectly involved in holding the Conference in Baku, Azerbaijan rather than in Bonn, Germany.”¹⁸⁶

CONCLUSION

The annual COP event is being co-opted by fossil fuel companies as well as other commercial, political and personal interests potentially in conflict with the central aim of staving off climate change. At its core, COP must act as a forum to bring world leaders together to make credible commitments to reduce greenhouse emissions and facilitate action. But the lack of rules and transparency requirements for the COP community, and the UNFCCC Secretariat in particular, is a systematic vulnerability that self-interested parties can exploit for their own ends. As the findings in this report show, these risks are especially prominent when the COP is hosted by governments, such as Azerbaijan for COP 29 in 2024 and the United Arab Emirates for COP 28 in 2023, with authoritarian rule¹⁸⁷ or high levels of corruption, and a dependency on the extraction and export of fossil fuels.

Specifically, under the current rules for governance and organisation, COPs run the risk of:

- outsized influence for national and international fossil fuels corporations during the organisation of the event, the negotiations taking place during it, and the development of the diplomatic platform and action agenda produced by the summit
- personal enrichment of politically connected elites through the co-opting of the summit's organisation and negotiations
- the cynical manipulation of media and civil society interests to further the agenda of the host country, deflect legitimate criticism, and greenwash practices

damaging to human rights, the environment, democracy and the climate.

This report has shown how these systematic risks may be exploited by the Azerbaijani government and fossil fuel interests that seek to use COP 29 to pursue their own interests.

The COP host “Troika” – UAE, Azerbaijan and Brazil – will not be the last oil-producing economies to host a UNFCCC climate summit. Depending on the host selected, other industries – including oil and gas, mining and other energy-intensive sectors – may also seek to capture the COP process for their own gain. But the UNFCCC can, and must, take measures to protect the integrity of the COP when such conflicts of interest arise in the future. The development and deployment of a playbook by which host governments could exploit the proceedings to advance their own agenda would constitute a fundamental threat to the integrity of UN climate conferences. Fortunately, the anti-corruption and climate communities have developed a series of measures that can help counter the undue influence of polluting industries, corrupt officials and their enablers. The recommendations made in this report apply this best practice to the COP context.

However, attention to these conflicts of interest, and measures to address them, should not be applied only when the risks are at their greatest. Every host should be obliged to implement fundamental transparency practices to ensure an open and level playing field at COP and that a multilateral, science-backed consensus comes first.

In September 2024, while this report was being prepared, the United Nations signed a Pact for the Future. This document redoubled signatory states' commitment to multilateral, science-backed responses to collective challenges. In the spirit of this pact, the UN must protect the conditions in which a common agenda can thrive at the COP.

When the pact was adopted, the president of Brazil, the country that will host COP 30, Luiz Inácio Lula da Silva, announced a "global ethical stocktaking, bringing together different civil society sectors to think about climate action from the perspective of justice, equity and solidarity."¹⁸⁸

Such a stocktake and the G20 proposal by Brazil, to put "anti-corruption be at the centre of policies to combat climate change"¹⁸⁹ provide a recognition of the need for more integrity for successful climate action and constitutes a welcome opportunity to address the findings of this report and begin the implementation of the recommendations listed below.

RECOMMENDATIONS

Integrity over the choice of the host country

Current practice does not prevent unsuitable governments from becoming the hosts of the most important global gathering on climate change and using the COP Presidency to privilege national or specific industry interests over the common good. The COP should follow a more robust process to select host countries:

- In addition to the current logistical, technical, and financial considerations, the Secretariat should assess and report to the Bureau on whether the prospective host country provides a conducive environment for all participants, particularly representatives from observer organisations, to exercise their human rights without fear of intimidation and repercussions, as well as guarantee reasonable costs for participation, thus allowing that concerned groups with limited resources have equal access to negotiations;
- The COP should only consider expressions of interest that have been vetted by the Bureau of the COP, after review and confirmation by the Secretariat that the proposal of the government demonstrates

commitment to the goals of the Convention and the Paris Agreement, the purposes and principles of the Charter of the United Nations, and international human rights law before, during and after UNFCCC sessions and mandated events;

- These requirements should be reflected in the handbook on hosting a COP.

Transparency around COP preparations and hosting arrangements

The host country must abide by the UNFCCC' process for due diligence and criteria¹⁹⁰ for selection of corporate partners. It should only allow sponsorships from entities that demonstrate commitment to the United Nations Global Compact and the United Nations Guiding Principles on Business and Human Rights.

- HCAs must include a commitment to uphold international human rights law before, during and after UNFCCC sessions and mandated events. This should include immunity of observer organisations' representatives and other persons from legal process in respect of words spoken or written and any act performed by them, within and outside conference premises.
- The host country should engage in HCA discussions in a transparent way and make the draft HCA available for feedback.
- In line with the June 2023 guidance from the Subsidiary Body for Implementation (SBI),¹⁹¹ HCAs should be published promptly on the UNFCCC website as soon as they are signed.
- HCAs should make the UNFCCC Secretariat's approval of partners compulsory. Specifically, HCAs should follow the UNFCCC "process for due diligence and criteria for selection of a partner," and include similar provisions to prevent sponsorship by entities "whose products, services or operations may negatively affect the objectives, activities or reputation of the secretariat, including but not limited to entities whose core products or core related services include fossil fuels."¹⁹²
- Host deals involving corporations and organisations granted Green Zone partner or exhibitor status must be published on

the UNFCCC website so that financial relationships are open to public scrutiny.

- The UNFCCC must establish clear guidelines governing the use of the COP brand in host country initiatives and diplomacy to prevent misuse that could promote endorsement of solutions serving fossil fuel interests or policies that contradict the goals of the UNFCCC and the Paris Agreement.

Accountability of the COP Presidency

The Presidency must be impartial, even if the appointing government has interests that conflict with science-aligned guidance for delivering the 1.5-2 degrees Celsius goal of the Paris Agreement. To preserve this impartiality, the Bureau of the Conference of the Parties (COP) must substantially review the Code of Ethics for Elected and Appointed Officers. Particular attention should be given to Article 14, to include the following:

- the obligation to disclose any situations or relationships, financial or otherwise, that might be perceived as affecting the objectivity and impartiality of the presidency in an interest disclosure form that must be made publicly available on the website of the UNFCCC Secretariat;
- the incompatibility of the position of president with any role (remunerated or not) and any holding financial or vested interests in an entity whose core products or core related products, services or operations may negatively affect the objectives, activities or reputation of the UNFCCC, including but not limited to fossil fuels;
- the public disclosure of all formal and informal meetings held in connection to the role of the presidency, with an indication of the topics addressed and attendees;
- the establishment of a clearly outlined process to deal with arising conflicts of interest and non-adherence to ethical rules;
- effective rules to enforce the replacement of the president when he or she violates ethical duties.

Transparency and accountability around COP participation

The COP is an international UN space. All information about whom the participants represent,

and their reasons for participation, should be made publicly available.

- The UNFCCC Secretariat should improve and enforce transparency requirements for the registration of COP participants, so that their most relevant affiliation is compulsorily declared and publicly released well ahead of the COP. This information should also be made visible during the COP.
- All COP organisers and delegation attendees should be required to declare any significant financial interests in, sponsorship by, or control over entities whose core products or core-related products, services or operations may negatively affect the objectives, activities or reputation of the UNFCCC, including but not limited to fossil fuels.
- The COP should establish a conflict of interest policy that clearly defines a conflict of interest, sets out disclosure requirements, and details how conflicts will be managed. It should ensure that all COP participants, including delegates, observers, and exhibitors, formally agree to abide by this policy as a condition of their participation.
- All delegations should adhere to the highest standards of transparency regarding whom they invite in their delegations and meetings with lobbyists in preparation for and during COP.

Business responsible engagement

All private sector entities participating in the COP as part of government delegations and observer organisations must adhere to minimum standards for responsible political engagement. In line with the Global Standard on Responsible Climate lobbying¹⁹³, organisations should publicly disclose:

- the policy issues or regulatory acts related to their lobbying activities, with an indication of their positions regarding the Paris Agreement goal of restricting global warming to 1.5 degrees Celsius above pre-industrial levels;
- their expenditures on lobbying, sponsorships, and other political engagement activities;

- the links to any public policy statements and research sent to public decision-makers, as well as to all transparency registers in which the entity is registered;
- the list of individuals in their senior management, board or in advisory positions who have previously or currently hold, or are otherwise seconded to, a position in government on climate matters or a government delegation to COP.

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