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From the Editor's Desk

Dear Readers,

In the dynamic landscape of the law, our commitment to fostering meaningful discussions on contemporary legal issues has never been more vital. This edition of our law journal is dedicated to the exploration and analysis of the pressing legal challenges that define our era.

As we peruse the pages of this issue, we embark on a journey through diverse and timely legal topics, each contributing to the rich tapestry of legal thought. Our contributors, comprising of esteemed scholars, practitioners, and thought leaders, delve into the intricacies of contemporary legal issues, offering perspectives that reflect the complexity and nuance inherent in our rapidly evolving world.

From groundbreaking court decisions to legislative developments, this issue spans a spectrum of legal domains, each presenting its own set of challenges and opportunities. Whether grappling with the intersection of technology and privacy, the evolving landscape of climate change, or the intricate dynamics of IPR, our authors navigate the terrain of contemporary legal issues with rigor and insight.

We initiate this literary journey with Handa S. Abidin and Andi Freeda Azizah Rezal's article on the examination of Climate related tweets and their relation with the Paris agreement. Dr. Anila V Menon's paper analyzes the concept of Data Protection in the Indian Context. This paper explores the state of Data Privacy and Protection in India and examines the legal landscape surrounding the same. Shaheen Marakkar's article on the Doha Declaration and its significance in promoting patent flexibility for public health where in the author evaluates various aspects of The Doha Declaration on the Trade-related Intellectual Property Rights (TRIPS) agreement and the significant flexibilities that were introduced to reconcile patent rights with public health imperatives and evaluates South Africa's medicines and Related Substances Control Amendment Act of 1997. Chandni Malhotra talks about the Digital Nomads in Dubai-Beginning to a New Era of Residency. In this article the author evaluates the journey of remote workers who travel away from their home country and how COVID-19 changed the entire ballgame of a 9-5 desk job. In the next article, the authors Neelam Faizan & Kulsum Haider analyze childcare institutions and the need for their strengthening under the juvenile justice system. Aniket Jadhav's article on The Chicago Trial vis a vis Right to Protest in India, outlines on the topic of the significant civil rights that took place in Chicago over several months from September 1969 to February 1970. In the context of India, the abstract analyzes the parallels and divergences between the Chicago trial and the Right to Protest in the Indian legal framework. Interesting insights into the various facets of law and related disciplines can be found in readers by the other articles.

This collection serves as a testament to the adaptability of the law in the face of societal shifts and technological advancements. It is our hope that the analyses presented herein not only deepen your understanding of these issues but also spark meaningful conversations and inspire further exploration.

The legal community plays a pivotal role in shaping the course of societal progress, and as we confront the complexities of current legal issues, we invite our readers, to engage actively in the ongoing discourse. Your perspectives, insights, and contributions are integral to the evolution of legal thought and practice.

Thank you for joining us on this intellectual journey. We trust that the knowledge shared in this edition will not only inform but also inspire the continued pursuit of justice, equity, and the rule of law.

Sincerely,

Dr Sagee Geetha Sethu

Editor-in-Chief, Amity Law Journal

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THE CLIMATE TWEETS OF ANTÓNIO GUTERRES AND THEIR RELATIONS WITH THE PARIS AGREEMENT

Handa S. Abidin* and Andi Freeda Azizah Rezal**

Abstract

The United Nations Secretary-General, António Guterres, devotes a sizable portion of his activity on the social media platform Twitter (@antonioguterres) to climate change. Throughout the years of 2017 to 2022, Guterres sent out 4,168 tweets. Approximately 18% of these tweets explicitly included the word “climate”. This percentage excludes tweets that can be related to climate change but do not include the word “climate”. The authors’ examination shows that in his climate-related tweets, Guterres has never discredited or undermined the Paris Agreement. In fact, Guterres’ tweets are always supportive of the Paris Agreement, and can be connected to endeavors that promote the fulfilment of the Paris Agreement. The climate tweets posted by Guterres serve as reminders, motivations, and critiques for the Parties to the Paris Agreement and relevant stakeholders in implementing the Paris Agreement.

Keywords: *Climate Change, Climate Tweet, Twitter, António Guterres, United Nations Secretary-General*

I. Introduction

Twitter had nearly a quarter of a billion monetizable daily active users in Q2 2022.¹ In comparison with a list of national populations around the world, the 238 million Twitter users would constitute the fifth largest after Indonesia (the fourth largest with 273 million people) and the United States (the third largest with 331 million people).² Courts, judges, legal scholars, and shareholders are among the parties that use Twitter to disseminate updates and express their opinions.³

The climate change movement on Twitter has been acknowledged in previous research.⁴ António Guterres, the United Nations Secretary-General (hereafter: the SG), has more than two million followers with more

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¹ Elon Musk disagrees with this number; he thinks the actual number of monetizable users is lower than that which was claimed by Twitter, see: Twitter Inc. vs. Elon R. Musk, X Holdings I, Inc., and X Holdings, Inc., “Defendants’ Verified Counterclaims, Answer, and Affirmative Defences to Plaintiff’s Verified Complaint” (Del. Ch.) C.A. No. 2022-0613-KSJM, e.g.: 3, 8-9, and 14-15.

² Ibid. The population data for Indonesia and the United States are based on 2021 data, see: “Population, Total”, World Bank, accessed December 26th, 2022, <https://perma.cc/83X5-LWR5>. For Twitter’s user population over the past few years, see: (1) Edith Brown Weiss, “International Law in a Kaleidoscopic World”, *Asian Journal of International Law* 1, no. 1 (January 2011): 21-32, 23; and (2) Elizabeth Thornburg, “Twitter and the #So-Called Judge”, *SMU Law Review* 71, no. 1 (Winter 2018): 249-314, 254.

³ (1) Margaret Jackson and Marita Shelly, “The Use of Twitter by Australian Courts”, *Journal of Law, Information and Science* 24, no. 1 (2015): 83-100; (2) Ibid, Thornburg; (3) Carissa Byrne Hessick, “Towards a Series of Academic Norms for #LawProf Twitter”, *Marquette Law Review* 101, no. 4 (Summer 2018): 903-924; (4) Sarah Joseph, “Social Media and Promotion of International Law”, *Proceedings of the Annual Meeting*, published by the American Society of International Law 109 (2015): 249-254, 249-250; and (5) Seth C. Oranburg, “A Little Birdie Said: How Twitter Is Disrupting Shareholder Activism”, *Fordham Journal of Corporate and Financial Law* 20, no. 3 (2015): 695-716, 696-697.

⁴ Jeremy R. McClane, “Class Action in the Age of Twitter: A Dispute Systems Approach”, *Harvard Negotiation Law Review* 19 (2014): 213-284, 242.

than 4,000 tweets as of December 31st, 2022.⁵ Guterres, who joined Twitter in December 2016, is the first SG to use Twitter for his work.⁶ When he took over the role of SG on January 1st, 2017,⁷ he immediately took to Twitter to welcome the new year and communicate his resolution towards peace.⁸ His tweets concentrate mainly on global issues such as humanitarian crises and climate change.⁹ His first climate tweet was related to climate initiatives in cities, and his last tweet in 2022 expressed his appreciation for “young #ClimateAction activists”.¹⁰

The 1945 United Nations Charter (UN Charter) is firm in its stance that the SG cannot be controlled by any country or party.¹¹ The position of the SG in the UN Charter is the organization’s (UN) “chief administrative officer”.¹² The SG is also considered to be “equal parts diplomat and advocate, civil servant and CEO, [...] a symbol of United Nations ideals and a spokesperson for the interests of the world’s peoples”.¹³ Other designations have been used to refer to the SG, such as: “norm entrepreneur”¹⁴, “authoritative interpreter of the Charter”¹⁵, “guardian of the principles of the UN Charter”¹⁶, “head of all international civil servants”¹⁷, “spokesperson of worldwide civil society”¹⁸, “spokesman for the Assembly”’s

⁵ These tweets include retweets and replies, see: António Guterres (@antonioguterres), Twitter, <https://perma.cc/KCJ6-T657>. Starting from the following tweet, “Antonio Guterres (@antonioguterres)” will be referred to as “Guterres”.

⁶ Ibid. Kofi Annan created a Twitter account in November 2010 after he served as the SG; his account’s most recent tweet was in 2019, see: Kofi Annan (@KofiAnnan), Twitter, <https://perma.cc/X8DL-93MW>.

⁷ “Biography”, United Nations, accessed December 16th, 2022, <https://perma.cc/K6AB-BUK7>.

⁸ Guterres, Twitter (12:00 p.m. Western Indonesia Time, January 1st, 2017), <https://perma.cc/X97N-WXQD>. “Western Indonesian Time” will be referred to as “WIB” (Waktu Indonesia Barat).

⁹ See in general the SG’s tweets: Guterres (n. 5).

¹⁰ (1) Guterres, Twitter (04:47 a.m. WIB, March 2nd, 2017), <https://perma.cc/PB4Z-M69X>; and (2) Guterres, Twitter (11:00 p.m. WIB, December 26th, 2022), <https://perma.cc/3KEJ-D5DS>.

¹¹ Charter of the United Nations (adopted June 26th, 1945, entered into force October 24th, 1945) (UN Charter), art. 100 para. 1, see also: para. 2. See also: Ramesh Thakur, “Choosing the Ninth United Nations Secretary-General: Looking Back, Looking Ahead”, *Global Governance* 23, no. 1 (January-March 2017): 1-14, 1-2.

¹² Ibid, UN Charter, art. 97. See also, e.g.: (1) “The Role of the Secretary-General”, United Nations, accessed December 26th, 2022, <https://perma.cc/H6BF-QE2S>; (2) Charles Henry Alexandrowicz, “The Secretary-General of the United Nations”, *International & Comparative Law Quarterly* 11, no. 4 (1962): 1109-1130, 1111-1112, 1116, and 1119; (3) Simon Rushton, “The UN Secretary-General and Norm Entrepreneurship: Boutros Boutros-Ghali and Democracy Promotion”, *Global Governance* 14, no. 1 (January-March 2008): 95-110, 97; (4) Simon Chesterman, “The Secretary-General We Deserve”, *Global Governance* 21, no. 4 (October-December 2015): 505-514, 505 and 510; and (5) Ratna Juwita, “An Aretaic Jurisprudence Approach to the Character of the Secretary-General of the United Nations as a Norm Entrepreneur to Save the Earth from the Adverse Impact of Climate Change”, *Korean Journal of International Law and Comparative Law* 6, no. 1 (June 2018): 30-46, 30, 33-34, 36, 42, and 46.

¹³ Ibid, “The Role of the Secretary-General”, United Nations.

¹⁴ E.g.: (1) Rushton (n. 12) 96, 98-100, and 104-106; (2) Chesterman (n. 12) 506; (3) Daisuke Madokoro, “How the United Nations Secretary-General Promotes International Norms”, *Global Responsibility to Protect* 7, no. 1 (2015): 31-55, 32-40, 46-47, and 53-54; and Juwita (n. 12) 30, 33-34, 36-39, 42-43, and 45-46.

¹⁵ Ibid, Rushton, 98.

¹⁶ B. G. Ramcharan, “The Office of the United Nations Secretary-General”, *Dalhousie Law Journal* 13, no. 2 (November 1990): 742-757, 744 (citing TM Frank).

¹⁷ Madokoro (n. 14) 36. See also: Juwita (n. 12) 36 (for: “head of international civil servants”).

¹⁸ Ibid.

majority”¹⁹, “flag bearer for the United Nations”²⁰, “international statesman”²¹, “world premier diplomat”²², “world’s diplomat”²³, and as a “CEO”²⁴ of the United Nations.

The SG is also recognized as a defender of “the poor and vulnerable”.²⁵ Guterres is one of the Secretaries-General whose primary focus has been on climate change.²⁶ In this context, Guterres has tweeted that those who are “poor and vulnerable” as well as “the poorest & most vulnerable” are the most impacted parties.²⁷ Guterres has stated that “[...] the fight against the climate crisis is the most important battle of my life”.²⁸ However, the SG also notes that world leaders have “dropped” the “priority” of the climate change agenda.²⁹

The SG is in charge of heading the Chief Executives Board for Coordination (CEB) of the UN which is comprised of various “Executive Heads of the United Nations”.³⁰ Climate change is an important topic that the CEB focuses on.³¹ The CEB also requested that the Executive Secretary of the United Nations Framework Convention on Climate Change (UNFCCC) be present at its session.³² The UNFCCC’s Executive Secretary is “appointed” by the SG.³³ In August 2022, Simon Stiell stepped into this role to head the UNFCCC Secretariat.³⁴ The post of the UNFCCC Executive Secretary is equivalent to that of an Under-Secretary-General.³⁵

This article aims to explore how Guterres utilizes Twitter to advocate for the climate agenda in the UNFCCC regime. To accomplish this, the authors examine 4,168 tweets from 2017 to 2022, posted by Guterres throughout his first and the beginning of his second terms as the SG.³⁶ Among these, more than 750 tweets explicitly contain the word “climate”.³⁷ These tweets are in addition to tweets that can

¹⁹ William D. Jackson, “The Political Role of the Secretary-General under U Thant and Kurt Waldheim: Development or Decline?”, *World Affairs* 140, no. 3 (Winter 1978): 230-244, 243.

²⁰ Ramcharan (n. 16) 756.

²¹ (1) *Ibid*, Ramcharan, 755 (citing S. Schwebel); and (2) Jackson (n. 19) 239.

²² Juwita (n. 12) 30, 33, 36, 42, and 46.

²³ Chesterman (n. 12) 505, 510, and 512.

²⁴ (1) Thakur (n. 11) 1; (2) Brian Urquhart, “The Next Secretary-General: How to Fill a Job with No Description”, *Foreign Affairs* 85, no. 5 (September/October 2006): 15-23, 22; (3) Catherine Tinker, “The Changing Role of the UN Secretary-General”, *Proceedings of the Annual Meeting (American Society of International Law)* 86, (1992): 308-312, 309 and citing James Sutterlin (311); and (4) “The Role of the Secretary-General”, *United Nations* (n. 12).

²⁵ *Ibid*, “The Role of the Secretary-General”, *United Nations*.

²⁶ See in general: (1) Guterres (n. 5); and (2) Juwita (n. 12) 34 and 41-46. See also: Thakur (n. 11) 4.

²⁷ (1) Guterres, Twitter (04:21 a.m. WIB, September 20th, 2019), <https://perma.cc/5FE8-NFSV>; and (2) Guterres, Twitter (07:54 p.m. WIB, October 18th, 2020), <https://perma.cc/2YJN-BWNJ>.

²⁸ Guterres, Twitter (05:30 a.m. WIB, November 12th, 2021), <https://perma.cc/8CN6-RN3F>.

²⁹ See e.g.: Guterres, Twitter (03:00 p.m. WIB, September 21st, 2022), <https://perma.cc/PV37-Z3BG>.

³⁰ “Board Members”, UN System Chief Executives Board of Coordination (CEB), accessed December 26th, 2022, <https://perma.cc/LVH4-37JZ>; (2) “FAQ”, CEB, accessed December 26th, 2022, <https://perma.cc/R8AB-GF3G>; (3) “About”, CEB, accessed December 26th, 2022, <https://perma.cc/3VRY-SNPM>; and (4) “The Role of the Secretary-General”, *United Nations* (n. 12).

³¹ “Climate Change”, CEB, accessed December 28th, 2022. <https://perma.cc/8SCU-TQCQ>.

³² “Board Members”, CEB (n. 30).

³³ “Executive Secretary”, UNFCCC, accessed December 27th, 2022, <https://perma.cc/9646-XUG2>.

³⁴ *Ibid*. For the structure of the UNFCCC Secretariat, see: “Secretariat Structure”, UNFCCC, accessed December 28th, 2022, <https://perma.cc/LU4B-59MR>.

³⁵ COP (UNFCCC), “Decision 22/CP.22, Financial and Budgetary Matters” FCCC/CP/2016/10/Add.2 (January 31st, 2017), preamble paras. 1 and 3-4, and para. 1. See also e.g.: COP (UNFCCC), “Decision 22/CP.26, Programme Budget for the Biennium 2022–2023” FCCC/CP/2021/12/Add.2 (March 8th, 2022), table 2.

³⁶ See: footnote 5. See also: “António Guterres Secures Second Term as UN Secretary-General, Calls for New Era of ‘Solidarity and Equality’”, *United Nations*, posted June 18th, 2021, <https://perma.cc/FR8D-MA56>.

³⁷ See: *ibid*, footnote 5.

be implicitly associated with climate change because they contain terms related to climate change, or because their content can be associated with climate change.³⁸

The authors categorize Guterres' tweets according to the Conference of the Parties (COP) events. The COP-based tweets focus on climate tweets from Guterres in response to the COP 23 to the COP 27 during the period when Guterres has been actively serving as the SG. The authors examine the content of the Guterres' climate tweets prior to, during, and after the COP 23 to the COP 27, and compare them to the text of the Paris Agreement.

The climate tweets made prior to a COP are identified by looking for specific hashtags related to that COP (for example: #COP27), or by examining whether the tweet explicitly mentions that it is referring to that particular COP. The identification of climate tweets posted during a COP is achieved by examining whether the tweets include a specific hashtag related to the COP, whether they were posted during the course of the COP events, and whether they can be linked either directly or indirectly to climate change. Climate tweets after the end of a COP are identified as climate tweets posted on the same day of the closing of the COP. Furthermore, climate tweets related to the Paris Agreement outside of the COP are also examined in this research.

It should be recognized that a single climate tweet might include many topics, and not every tweet shall be scrutinized to have its contents determined for this research. Furthermore, not all of Guterres' climate tweets will be discussed in this research. Nonetheless, this research is intended to shed light on the connection between Guterres' climate tweets and the Paris Agreement, mainly concerning whether or not the tweets provide direct or indirect support for the Paris Agreement. In a wider context, social media, including Twitter, can contribute to advancing international law.³⁹ In general, this research also intends to improve the advancement of the literature on international law through the analysis of social media responses—specifically from Guterres' climate tweets—to topics on international climate change law.

II. The Paris Agreement and Guterres' Climate Tweets in Relation to the Cop 23 - Cop 27

Guterres demonstrates “persuasive powers”⁴⁰ in his climate tweets in support of the Paris Agreement, whether these were in the context of the COP and the Paris Agreement or unrelated to the COP but related to the Paris Agreement as will be described in the subsequent paragraphs. One of the forms of “persuasive powers”⁴¹ presented by Guterres is in the form of “mobilizing shame”⁴² for certain parties.⁴³ The values of “aretai”⁴⁴ and “norm entrepreneurship”⁴⁵ are also expressed in Guterres' climate tweets, which are described below, although there are some tweets with tones that fail to reflect the quality of “patience”⁴⁶.

In general, it is relevant to directly or indirectly connect Article 2 Paragraph 1 (a) of the Paris Agreement to all the climate tweets by Guterres, which is:

³⁸ See: *ibid.*

³⁹ See in general: Joseph (n. 3).

⁴⁰ For a discussion concerning “persuasive powers”, see: Ian Johnston, “The Role of the UN Secretary-General: The Power of Persuasion Based on Law”, *Global Governance* 9, no. 4 (October-December 2003): 441-458, 441-442, and 451-454.

⁴¹ See: *ibid.*

⁴² See: *ibid.*, 453.

⁴³ See footnotes 82, 121, and 150.

⁴⁴ See in general: Juwita (n. 12).

⁴⁵ See footnote 14, for the context of climate change, see: *ibid.*, Juwita.

⁴⁶ *Ibid.*, Juwita, 37. See also footnotes 82, 121, and 150.

“This Agreement, in enhancing the implementation of the Convention, including its objective, aims to strengthen the global response to the threat of climate change, in the context of sustainable development and efforts to eradicate poverty, including by: (a) Holding the increase in the global average temperature to well below 2°C above pre-industrial levels and pursuing efforts to limit the temperature increase to 1.5°C above pre-industrial levels, recognizing that this would significantly reduce the risks and impacts of climate change.”⁴⁷

Article 4 Paragraph 1 of the Paris Agreement also has a similar character to Article 2 Paragraph 1 (a), particularly regarding the implementation of Article 2.⁴⁸ There are also tweets which can be associated with the Paris Agreement in a wider sense due to their general nature.

The number of tweets posted by Guterres in relation to the COP 23 (November 6th-18th, 2017 in Bonn, Germany)⁴⁹ was the lowest during his term of office so far.⁵⁰ Only two of his tweets directly referenced the COP 23 (mentioning “@COP23”) in 2017.⁵¹ The content of the two explicit tweets at the time urged “leaders” and “world leaders” to increase their efforts to address climate change.⁵² There was one tweet that did not explicitly reference the COP 23, but its substance was related to climate change and it was posted during the COP 23.⁵³ This tweet concerns the existence of the Paris Agreement because of its reference to the alarming growth of CO2 emissions.⁵⁴

The COP 24 was held on December 2nd-16th, 2018 in Katowice, Poland.⁵⁵ Prior to its commencement, Guterres posted a tweet expressing his support for the Paris Agreement in connection to the COP 24 event.⁵⁶ He also tweeted about the need for “global cooperation” in addressing climate change⁵⁷, noted that the objective of lowering carbon emissions should not be compromised in exchange for a rising economy⁵⁸, and posted a congratulatory tweet for Germany on its Green Climate Fund’s funding⁵⁹. During the COP 24, an explicit tweet related to the Paris Agreement was sent by Guterres welcoming the Katowice’s Paris

⁴⁷ Paris Agreement (adopted December 12th, 2015, entered into force November 4th, 2016) art. 2 para. 1 (a).

⁴⁸ Ibid, art. 4 para. 1 and art. 2.

⁴⁹ (1) “COP23”, UNFCCC, accessed January 2nd, 2023, <https://perma.cc/R4U9-YL48>; (2) “Bonn: UN Conference Closes with Renewed Urgency for Greater Ambition to Tackle Climate Change”, United Nations, posted November 17th, 2017, <https://perma.cc/5GPJ-7Y6Q>; (3) UN Climate Change (@UNFCCC) (hereinafter: UNFCCC), Twitter (09:03 p.m. WIB, November 6th, 2017), <https://perma.cc/NY5L-K6RX>; and (4) UNFCCC, Twitter (06:33 a.m. WIB, 18 November 18th, 2017), <https://perma.cc/9HMT-6QE6>.

⁵⁰ See in general: Guterres (n. 5).

⁵¹ (1) Guterres, Twitter (06:39 p.m. WIB, November 14th, 2017), <https://perma.cc/9A9E-Y2BB>; and (2) Guterres, Twitter (06:20 p.m. WIB, November 15th, 2017), <https://perma.cc/6KZS-Q6LG>.

⁵² Ibid. See in general: Paris Agreement (n. 47).

⁵³ Guterres, Twitter (06:40 p.m. WIB, November 14th, 2017), <https://perma.cc/YY76-N3XQ>.

⁵⁴ Ibid. See in general: Paris Agreement (n. 47).

⁵⁵ (1) “Katowice Climate Change Conference – December 2018”, UNFCCC, accessed January 2nd, 2023, <https://perma.cc/2JCD-Y6VT>; (2) “At COP24, Countries Agree Concrete Way Forward to Bring the Paris Climate Deal to Life”, United Nations, posted December 15th, 2018, <https://perma.cc/Y3HL-VYX5>; (3) UNFCCC, Twitter (06:34 p.m. WIB, December 2nd, 2018), <https://perma.cc/QY2J-XLG7>; and (4) UNFCCC, Twitter (04:23 a.m. WIB, December 16th, 2018), <https://perma.cc/VZ33-NWCU>. See in general: Guterres (n. 5).

⁵⁶ Guterres, Twitter (03:51 a.m. WIB, November 18th, 2018), <https://perma.cc/6SPC-X8J5>. See in general: Paris Agreement (n. 47).

⁵⁷ Guterres, Twitter (12:42 a.m. WIB, November 29th, 2018), <https://perma.cc/NTX8-WBU3>. See: *ibid*, Paris Agreement, e.g.: art. 2 para. 1 and art. 3.

⁵⁸ Guterres, Twitter (04:15 a.m. WIB, November 29th, 2018), <https://perma.cc/42SB-JYFL>. See: *ibid*, Paris Agreement, e.g.: preamble para. 10.

⁵⁹ Guterres, Twitter (01:45 a.m. WIB, November 29th, 2018), <https://perma.cc/ZC5X-B993>. See: *ibid*, Paris Agreement, e.g.: in general art. 9.

Agreement Work Programme.⁶⁰ He also posted several tweets during the COP 24 calling on “world leaders”⁶¹, “leaders of this generation”⁶², and “everyone at #COP24”⁶³ to address climate change. In the topics of “young people” and “civil society”, he asked them to monitor leaders as they implement their efforts to combat climate change.⁶⁴ He sent a climate appreciation tweet to “young people”.⁶⁵ He also implicitly posted a tweet related to future generations.⁶⁶

Before, throughout, and after the COP 25 (December 2nd-15th, 2019 in Madrid, Spain⁶⁷), Guterres sent climate tweets to “leaders of all countries”⁶⁸ and more generally to “countries”⁶⁹, “the international community”⁷⁰, and the public in general⁷¹ in regards to strengthening their climate actions. Before the COP 25, Guterres lauded and placed his hopes on climate actions of “youth climate activists”.⁷² Throughout and shortly after the COP 25, Guterres tweeted about the world’s “carbon neutrality in 2050”⁷³, the impact of the climate crisis⁷⁴, the responsibility of the G20 and the “biggest emitters” in regards to climate change⁷⁵,

⁶⁰ Guterres, Twitter (04:06 a.m. WIB, December 16th, 2018), <https://perma.cc/6KTA-5N2M>. See in general: *ibid*, Paris Agreement.

⁶¹ (1) Guterres, Twitter (11:27 p.m. WIB, December 2nd, 2018), <https://perma.cc/Q7GX-M7BY>; and (2) Guterres, Twitter (04:39 p.m. WIB, December 3rd, 2018), <https://perma.cc/4K7Z-4K3Y>. See in general: *ibid*, Paris Agreement.

⁶² Guterres, Twitter (06:12 p.m. WIB, December 3rd, 2018), <https://perma.cc/2B24-RY7M>. See in general: *ibid*, Paris Agreement.

⁶³ Guterres, Twitter (07:36 p.m. WIB, December 4th, 2018), <https://perma.cc/VH8C-W66T>. See in general: *ibid*, Paris Agreement.

⁶⁴ Guterres, Twitter (10:10 p.m. WIB, December 14th, 2018), <https://perma.cc/8DV9-VHET>. See in general: *ibid*, Paris Agreement, see also: art. 16 para. 8.

⁶⁵ Guterres, Twitter (08:11 p.m. WIB, December 3rd, 2018), <https://perma.cc/MER8-7CKQ>. See: *ibid*, Paris Agreement, see also: art. 16 para. 8.

⁶⁶ Guterres, Twitter (05:04 a.m. WIB, 13 December 13th, 2018), <https://perma.cc/VD7F-2MD4>. See: *ibid*, Paris Agreement, e.g.: preamble para. 11.

⁶⁷ (1) “UN Climate Change Conference - December 2019”, UNFCCC, accessed January 3rd, 2023, <https://perma.cc/68HD-7P87>; (2) “An Important Opportunity Lost as COP25 Ends in Compromise, but Guterres Declares ‘We Must Not Give Up’”, United Nations, posted December 15th, 2019, <https://perma.cc/APH8-5QKC>; (3) UNFCCC, Twitter (02:34 p.m. WIB, December 2nd, 2019), <https://perma.cc/8XCR-V9DR>; and (4) UNFCCC, Twitter (07:34 p.m. WIB, December 15th, 2019), <https://perma.cc/PXG2-YRBD>.

⁶⁸ Guterres, Twitter (06:49 p.m. WIB, December 1st, 2019), <https://perma.cc/DTJ7-BL5S>. See in general: Paris Agreement (n. 47).

⁶⁹ Guterres, Twitter (01:00 p.m. WIB, December 13th, 2019), <https://perma.cc/TH9R-47LB>. See in general: *ibid*, Paris Agreement.

⁷⁰ This tweet was sent during or after the closing ceremony, see: (1) Guterres, Twitter (08:07 p.m. WIB, December 15th, 2019), <https://perma.cc/26KR-696C>; and (2) UNFCCC, Twitter (07:34 p.m. WIB, December 15th, 2019), (n. 67). See: *ibid*, Paris Agreement, e.g.: art. 2 para. 1 (b)-(c) and in general: art. 7 and art. 9.

⁷¹ (1) Guterres, Twitter (09:42 p.m. WIB, November 28th, 2019), <https://perma.cc/J7KR-9TZM>; and (2) Guterres, Twitter (05:33 p.m. WIB, December 2nd, 2019), <https://perma.cc/5AAK-PSDL>. See in general: *ibid*, Paris Agreement and see also: preamble paras. 9-10.

⁷² Guterres, Twitter (12:13 a.m. WIB, December 2nd, 2019), <https://perma.cc/VZ4Z-2927>. See in general: *ibid*, Paris Agreement, see also: art. 16 para. 8.

⁷³ This tweet was sent during or after the closing ceremony, see: (1) Guterres, Twitter (08:08 p.m. WIB, December 15th, 2019), <https://perma.cc/R73N-23DX>; and (2) UNFCCC, Twitter (07:34 p.m. WIB, December 15th, 2019), (n. 67). See in general: *ibid*, Paris Agreement, see also: art. 2 para. 1 (a).

⁷⁴ Guterres, Twitter (01:21 a.m. WIB, December 5th, 2019), <https://perma.cc/F857-L2FE>. See in general: *ibid*, Paris Agreement, see also: preamble paras. 5 and 11, art. 7 paras. 2, 5-6, and 9, and art. 9 para. 4.

⁷⁵ (1) Guterres, Twitter (06:01 p.m. WIB, December 2nd, 2019), <https://perma.cc/LAD4-8QBX>; and (2) Guterres, Twitter (11:46 p.m. WIB, December 11th, 2019), <https://perma.cc/9CND-C5FR>. See in general: *ibid*, Paris Agreement, see also: art. 4 para. 4, in general art. 9, art. 11 para. 3, and art. 13 para. 9.

the abandonment of fossil fuels⁷⁶, the shift to a green economy⁷⁷, and the need to address climate change for “future generations”⁷⁸. Guterres also posted in support of the EU’s plan for “carbon neutrality by 2050”⁷⁹. Furthermore, he expressed his concern about climate justice⁸⁰ for the Alliance of Small Island States.⁸¹ Among these tweets, Guterres was particularly strong when criticizing the fossil fuel industry, saying: “We urgently need more businesses to back away from fossil fuels”.⁸²

This research found that, out of all the COPs, the COP 26 (October 31st-November 13th, 2021 in Glasgow, the UK⁸³) had the highest concentration of climate-related tweets.⁸⁴ These tweets were posted before, throughout, and after the COP 26.⁸⁵ The tweets before the commencement of the COP 26 began with Guterres’ approval for the postponement of the COP 26 in 2020 due to COVID-19.⁸⁶ He then posted climate tweets aimed at “world leaders”⁸⁷, “leaders”⁸⁸, “all countries”⁸⁹, “all nations”⁹⁰, “governments”⁹¹, and the

⁷⁶ (1) Guterres, Twitter (06:14 p.m. WIB, December 2nd, 2019), <https://perma.cc/VUD3-FG2S>; and (2) Guterres, Twitter (07:32 p.m. WIB, December 11th, 2019), <https://perma.cc/H2SU-EH3P>. See in general: *ibid*, Paris Agreement, see also: preamble para. 10.

⁷⁷ (1) Guterres, Twitter (02:28 a.m. WIB, December 4th, 2019), <https://perma.cc/TPQ3-8ZRZ>; and (2) Guterres, Twitter (09:16 p.m. WIB, December 12th, 2019), <https://perma.cc/E77Z-MWYW>. See: *ibid*, Paris Agreement, e.g.: preamble para. 10.

⁷⁸ Guterres, Twitter (05:00 a.m. WIB, December 13th, 2019), <https://perma.cc/4DPM-VWT3>. See: *ibid*, Paris Agreement, e.g.: preamble para. 11.

⁷⁹ Guterres, Twitter (03:44 p.m. WIB, December 13th, 2019), <https://perma.cc/C7JH-8AN2>. See in general: *ibid*, Paris Agreement, see also: art. 4 paras. 16 and 18.

⁸⁰ For an explanation of “climate justice” see: Rob Macquarie (Reviewed by: Catherine Higham and Sabrina Muller), “What is Meant by ‘Climate Justice’?”, Grantham Research Institute on Climate Change and the Environment, posted June 7th, 2022, <https://perma.cc/T2QL-S55C>.

⁸¹ Guterres, Twitter (01:33 a.m. WIB, December 13th, 2019), <https://perma.cc/VC2W-H7F9>. See in general: *ibid*, Paris Agreement, see also: preamble para. 13, and art. 9 paras. 4 and 9.

⁸² Guterres, Twitter (07:32 p.m. WIB, December 11th, 2019), (n. 76). See also: Handa S. Abidin, “Menko Perekonomian, Krisis Iklim, dan Peluang Climate Tech Unicorns”, *Industry.co.id*, posted June 28th, 2022, <https://perma.cc/EW9T-QFLX>.

⁸³ (1) “Glasgow Climate Change Conference – October-November 2021”, UNFCCC, accessed January 4th, 2023, <https://perma.cc/HT34-44AF>; (2) “COP26 Closes with ‘Compromise’ Deal on Climate, but It’s Not Enough, Says UN Chief”, United Nations, posted November 13th, 2021, <https://perma.cc/R9AA-XJQN>; (3) UNFCCC, Twitter (06:12 p.m. WIB, October 31st, 2021), <https://perma.cc/G4ZP-BTGH>; and (4) UNFCCC, Twitter (01:55 a.m. WIB, November 14th, 2021), <https://perma.cc/8G5R-JV5G>.

⁸⁴ See in general: footnote 5.

⁸⁵ See in general: *ibid*.

⁸⁶ Guterres, Twitter (12:22 a.m. WIB, April 3rd, 2020), <https://perma.cc/WE5C-VKBB>.

⁸⁷ Guterres, Twitter (03:12 a.m. WIB, October 29th, 2021), <https://perma.cc/ZU6Q-6JA8>. See in general: Paris Agreement (n. 47).

⁸⁸ (1) Guterres, Twitter (10:56 p.m. WIB, October 26th, 2021), <https://perma.cc/T3AS-2HSW>; and (2) Guterres, Twitter (05:27 a.m. WIB, October 30th, 2021), <https://perma.cc/8TMC-CA88>. See in general: *ibid*, Paris Agreement, see also: art. 2 para. 1 (a).

⁸⁹ (1) Guterres, Twitter (05:45 a.m. WIB, February 9th, 2021), <https://perma.cc/QB89-EPKF>; (2) Guterres, Twitter (10:35 a.m. WIB, July 9th, 2021), <https://perma.cc/QQ33-ECT2>; (3) Guterres, Twitter (09:27 p.m. WIB, July 23rd, 2021), <https://perma.cc/4V8S-D6MB>; (4) Guterres, Twitter (10:00 p.m. WIB, September 16th, 2021), <https://perma.cc/U56X-R358>; and (5) Guterres, Twitter (03:31 p.m. WIB, September 22nd, 2021), <https://perma.cc/6FW8-H22E>. See in general: *ibid*, Paris Agreement, see also: art. 2 para. 1, art. 7, and art. 9.

⁹⁰ Guterres, Twitter (05:30 a.m. WIB, October 1st, 2021), <https://perma.cc/GH63-NGQ7>. See in general: *ibid*, Paris Agreement.

⁹¹ Guterres, Twitter (06:14 a.m. WIB, October 28th, 2021), <https://perma.cc/JKS8-WHN2>. See in general: *ibid*, Paris Agreement.

public in general⁹². Guterres also restates the United Nations' commitment to climate change.⁹³ He also tweeted about the Paris Agreement's importance, and the need to "restore the spirit of the #ParisAgreement".⁹⁴ In his tweets, Guterres emphasized the significance of a partnership effort between the United States and China to ensure the fulfilment of the Paris Agreement.⁹⁵ He also highlighted that the G20, as the world's greatest carbon producer, must uphold the "goal of 1.5 degrees", and called them to the COP 26 to raise their climate commitment.⁹⁶ Guterres and the UK's Prime Minister requested cooperation from other parties on the outcome of the COP 26,⁹⁷ and Guterres also made a request for countries in Latin America and the Caribbean to back the COP 26.⁹⁸ Furthermore, he expressed his endorsement of the United Arab Emirates' pledge to achieve "net zero emissions by 2050".⁹⁹ Guterres repeatedly asked "young people" to continue monitoring the COP 26.¹⁰⁰ Guterres urged developed countries to aid developing countries in their green transformation to avoid fossil fuels.¹⁰¹ Guterres stressed the significance of COP 26's outcome in relation to "the future of our children and grandchildren".¹⁰²

The climate tweets related to the COP 26 from Guterres during and after the COP 26 included general climate tweets on the importance of climate actions addressed to "leaders"¹⁰³, "all countries"¹⁰⁴,

⁹² (1) Guterres, Twitter (04:48 p.m. WIB, October 11th, 2021), <https://perma.cc/6BTE-TK2A>; (2) Guterres, Twitter (06:05 a.m. WIB, October 27th, 2021), <https://perma.cc/8DWW-MXV5>; (3) Guterres, Twitter (03:46 p.m. WIB, October 30th, 2021), <https://perma.cc/Q7W7-PYXL>; and (4) Guterres, Twitter (03:46 p.m. WIB, October 30th, 2021), <https://perma.cc/4UD7-ETQX>. See in general: *ibid*, Paris Agreement.

⁹³ (1) Guterres, Twitter (01:03 a.m. WIB, November 13th, 2020), <https://perma.cc/W974-BRYG>; and (2) Guterres, Twitter (01:54 a.m. WIB, November 13th, 2020), <https://perma.cc/SX9G-CPGP>. See in general: *ibid*, Paris Agreement.

⁹⁴ (1) Guterres, Twitter (06:30 a.m. WIB, February 20th, 2021), <https://perma.cc/2D2L-RA33>; and (2) Guterres, Twitter (03:53 p.m. WIB, October 3rd, 2021), <https://perma.cc/7NF5-LTXD>. See in general: *ibid*, Paris Agreement.

⁹⁵ Guterres, Twitter (04:45 a.m. WIB, April 20th, 2021), <https://perma.cc/3A4N-NLZU>. See also: Guterres, Twitter (01:46 a.m. WIB, November 11th, 2021), <https://perma.cc/7VP4-29G9>. See in general: *ibid*, Paris Agreement, see also: art. 2.

⁹⁶ (1) Guterres, Twitter (10:05 p.m. WIB, September 3rd, 2020), <https://perma.cc/HY39-YAW3>; (2) Guterres, Twitter (07:45 p.m. WIB, October 31st, 2021), <https://perma.cc/E46Z-T83Z>; and (3) Guterres, Twitter (09:54 p.m. WIB, October 31st, 2021), <https://perma.cc/Y2T7-RJHL>. See in general: *ibid*, Paris Agreement, see also: art. 2 para. 1, art. 4 para. 4, in general art. 9, art. 11 para. 3, and art. 13 para. 9.

⁹⁷ Guterres, Twitter (07:24 a.m. WIB, September 21st, 2021), <https://perma.cc/UCB2-C4T6>. See in general: *ibid*, Paris Agreement.

⁹⁸ Guterres, Twitter (04:59 a.m. WIB, September 9th, 2021), <https://perma.cc/D5X5-SSKD>. See in general: *ibid*, Paris Agreement, see also: art. 2 para. 1 and art. 4 para. 4.

⁹⁹ Guterres, Twitter (05:35 a.m. WIB, October 8th, 2021), <https://perma.cc/MTZ7-CWHC>. See in general: *ibid*, Paris Agreement, see also: art. 4 para. 4.

¹⁰⁰ (1) Guterres, Twitter (08:30 a.m. WIB, September 24th, 2021), <https://perma.cc/WAS2-N49C>; (2) Guterres, Twitter (09:01 a.m. WIB, October 1st, 2021), <https://perma.cc/8ZG7-VUFH>; and (3) Guterres, Twitter (12:01 a.m. WIB, October 31st, 2021), <https://perma.cc/82DQ-PCLN>. See in general: *ibid*, Paris Agreement, see also: preamble para. 13 and art. 16 para. 8.

¹⁰¹ Guterres, Twitter (03:20 a.m. WIB, January 12th, 2021), <https://perma.cc/X4EV-WPZV>. See in general: *ibid*, Paris Agreement, see also: preamble para. 10 and in general art. 9.

¹⁰² (1) Guterres, Twitter (01:57 a.m. WIB, December 13th, 2020), <https://perma.cc/AR8L-H3FN>; and (2) Guterres, Twitter (05:25 a.m. WIB, February 8th, 2021), <https://perma.cc/RF5R-METW>. See: *ibid*, Paris Agreement, e.g.: preamble para. 11.

¹⁰³ Guterres, Twitter (10:45 a.m. WIB, November 1st, 2021), <https://perma.cc/R2F2-Z95H>. See in general: *ibid*, Paris Agreement.

¹⁰⁴ (1) Guterres, Twitter (08:02 p.m. WIB, November 1st, 2021), <https://perma.cc/LFG8-TZNT>; and (2) Guterres, Twitter (05:35 p.m. WIB, November 11st, 2021), <https://perma.cc/YZH9-Z4XU>. See in general: *ibid*, Paris Agreement, see also: art. 2 para. 1.

“negotiators”¹⁰⁵, “#COP26”¹⁰⁶, and the public¹⁰⁷. Guterres offered a response to the climate consequences in Madagascar.¹⁰⁸ Guterres reminded companies of their role in responding to climate change.¹⁰⁹ During and after the COP 26, Guterres emphasized his support of overseeing climate action by “young people”¹¹⁰, “young climate activists”¹¹¹, “women leaders”¹¹², and “indigenous communities”¹¹³. Guterres expressed his sympathy with the hundreds of murdered environmental activists.¹¹⁴ Other topics that were of concern to Guterres during and after the COP 26 included climate finance where developed countries need to assist developing countries¹¹⁵, early warning systems¹¹⁶, tsunami climate resilience¹¹⁷, stopping dependence on fossil fuels¹¹⁸, and the utilization of environmentally friendly energy¹¹⁹. Guterres appreciated the declarations from numerous countries to protect forests.¹²⁰ Among Guterres’ tweets regarding the COP 26, he reaffirmed his opposition to the use of fossil fuels with a strong tone: “Our addiction to fossil fuels is pushing humanity to the brink [...] We are digging our own graves”.¹²¹

¹⁰⁵ Guterres, Twitter (08:57 a.m. WIB, November 6th, 2021), <https://perma.cc/FTH6-NDGN>. See in general: *ibid*, Paris Agreement, see also: preamble para. 13.

¹⁰⁶ Guterres, Twitter (06:24 p.m. WIB, November 10th, 2021), <https://perma.cc/4KLW-5BY8>. See in general: *ibid*, Paris Agreement, see also: preamble para. 10.

¹⁰⁷ (1) Guterres, Twitter (07:07 a.m. WIB, November 1st, 2021), <https://perma.cc/D67W-FYKM>; (2) Guterres, Twitter (11:37 p.m. WIB, November 11th, 2021), <https://perma.cc/FLJ7-CQES>; (3) Guterres, Twitter (05:30 a.m. WIB, November 12th, 2021), (n. 28); (4) Guterres, Twitter (03:13 a.m. WIB, November 14th, 2021), <https://perma.cc/3FVL-9RMT>; (5) Guterres, Twitter (09:43 p.m. WIB, November 1st, 2021), <https://perma.cc/S6YR-78MT>; and (6) Guterres, Twitter (06:09 a.m. WIB, November 8th, 2021), <https://perma.cc/A5G2-ZET6>. See in general: *ibid*, Paris Agreement.

¹⁰⁸ Guterres, Twitter (10:16 p.m. WIB, November 7th, 2021), <https://perma.cc/4BAB-WQBU>. See: “Least Developed Country Category: Madagascar Profile”, United Nations, accessed March 5th, 2023, <https://perma.cc/H448-6C57>. See also: *ibid*, Paris Agreement, e.g.: art. 4 para. 6, art. 9 paras. 4 and 9, and art. 11 para. 1.

¹⁰⁹ Guterres, Twitter (10:12 p.m. WIB, November 10th, 2021), <https://perma.cc/QZZ3-5PF6>. See in general: *ibid*, Paris Agreement, see also: preamble para. 10.

¹¹⁰ (1) Guterres, Twitter (10:02 a.m. WIB, November 2nd, 2021), <https://perma.cc/V2EH-4EBY>; (2) Guterres, Twitter (06:31 a.m. WIB, November 14th, 2021), <https://perma.cc/M725-ASLF>; (3) Guterres, Twitter (06:53 a.m. WIB, November 3rd, 2021), <https://perma.cc/FTN4-58K5>; and (4) Guterres, Twitter (06:27 a.m. WIB, November 11th, 2021), <https://perma.cc/DW7U-FRPT>. See in general: *ibid*, Paris Agreement, see also: art. 16 para. 8.

¹¹¹ Guterres, Twitter (03:13 a.m. WIB, 3 November 3rd, 2021), <https://perma.cc/3ZLC-TUQH>. See in general: *ibid*, Paris Agreement, see also: art. 16 para. 8.

¹¹² Guterres, Twitter (06:31 a.m. WIB, 14 November 14th, 2021) (n. 110). See in general: *ibid*, Paris Agreement, see also: art. 16 para. 8.

¹¹³ Guterres, Twitter (10:02 a.m. WIB, November 2nd, 2021) (n. 110). See in general: *ibid*, Paris Agreement, see also: art. 16 para. 8.

¹¹⁴ Guterres, Twitter (03:33 p.m. WIB, November 10th, 2021), <https://perma.cc/VC6T-BQKZ>. See: *ibid*, Paris Agreement, preamble para. 11.

¹¹⁵ (1) Guterres, Twitter (11:32 p.m. WIB, November 1st, 2021), <https://perma.cc/K634-Y8CS>; and (2) Guterres, Twitter (11:12 p.m. WIB, November 4th, 2021), <https://perma.cc/7PYE-XWFA>. See: *ibid*, Paris Agreement, in general art. 9.

¹¹⁶ Guterres, Twitter (02:02 p.m. WIB, November 2nd, 2021), <https://perma.cc/T37P-HAW8>. See: *ibid*, Paris Agreement, e.g., in general arts. 7-9.

¹¹⁷ Guterres, Twitter (07:07 a.m. WIB, November 5th, 2021), <https://perma.cc/E4JP-BY7B>. See: *ibid*, Paris Agreement, e.g.: in general arts. 7-8.

¹¹⁸ (1) Guterres, Twitter (03:15 a.m. WIB, November 2nd, 2021), <https://perma.cc/44QF-MFAK>; and (2) Guterres, Twitter (09:22 p.m. WIB, November 14th, 2021), <https://perma.cc/QW63-88TZ>. See in general: *ibid*, Paris Agreement, see also: preamble para. 10 and in general art. 9.

¹¹⁹ Guterres, Twitter (02:08 a.m. WIB, November 7th, 2021), <https://perma.cc/F8Z9-WTQG>. See in general: *ibid*, Paris Agreement, see also: preamble para. 10.

¹²⁰ Guterres, Twitter (05:08 p.m. WIB, November 2nd, 2021), <https://perma.cc/NEX4-B6GY>. See: *ibid*, Paris Agreement, e.g: preamble para. 12 and art. 5.

¹²¹ Guterres, Twitter (03:15 a.m. WIB, November 2nd, 2021) (n. 118). See: footnote 82.

In 2022 (6-20 November 6th-20th, 2022), the COP 27 was held in Egypt (Sharm El Sheikh).¹²² Prior to its opening, Guterres addressed his general climate tweets to “world leaders”¹²³, “leaders”¹²⁴, “governments”¹²⁵, “#COP27”¹²⁶, and the public¹²⁷. Furthermore, he also discussed loss and damage¹²⁸, food shortages caused by the effects of climate change¹²⁹, and early warning systems to manage the impact of climate change¹³⁰. During and after the COP 27, Guterres sent general climate tweets addressing climate change to “global leaders”¹³¹, “world leaders”¹³², “leaders”¹³³, “representatives”¹³⁴, “negotiators”¹³⁵, “#COP27”¹³⁶, and the public¹³⁷. During the COP 27, Guterres tweeted his support for “young people”¹³⁸,

¹²² (1) “COP27”, UNFCCC, accessed January 5th, 2023, <https://perma.cc/5S6J-ZE9B>; (2) “COP27 Closes with Deal on Loss and Damage: ‘A Step Towards Justice,’ Says UN Chief”, United Nations, posted November 20th, 2022, <https://perma.cc/4ZYX-XHRP>; (3) UNFCCC, Twitter (04:37 p.m. WIB, November 6th, 2022), <https://perma.cc/K96W-CRCN>; and (4) UNFCCC, Twitter (09:17 a.m. WIB, November 20th, 2022), <https://perma.cc/SG5W-BKJA>.

¹²³ Guterres, Twitter (08:30 a.m. WIB, September 22nd, 2022), <https://perma.cc/A7LY-JVKY>. See in general: *ibid*, Paris Agreement (n. 47), see also: art. 2 para. 1 and arts. 7-9.

¹²⁴ (1) Guterres, Twitter (07:01 p.m. WIB, September 29th, 2022), <https://perma.cc/C8JW-MNP7>; (2) Guterres, Twitter (11:20 p.m. WIB, October 2nd, 2022), <https://perma.cc/2X7V-YQ35>; (3) Guterres, Twitter (08:54 a.m. WIB, October 4th, 2022), <https://perma.cc/DLB2-MG6L>; and (4) Guterres, Twitter (01:34 a.m. WIB, November 5th, 2022), <https://perma.cc/Y2JC-D8K2>. See: *ibid*, Paris Agreement.

¹²⁵ Guterres, Twitter (03:31 a.m. WIB, October 4th, 2022), <https://perma.cc/QUX8-6JRE>. See: *ibid*, Paris Agreement, art. 8.

¹²⁶ Guterres, Twitter (08:04 a.m. WIB, October 26th, 2022), <https://perma.cc/994W-NCMS>. See in general: *ibid*, Paris Agreement.

¹²⁷ Guterres, Twitter (10:38 a.m. WIB, November 4th, 2022), <https://perma.cc/3VGD-WZVN>. See in general: *ibid*, Paris Agreement.

¹²⁸ Guterres, Twitter (07:55 p.m. WIB, November 4th, 2022), <https://perma.cc/2SCC-MMA9>. See also: Guterres, Twitter (04:54 p.m. WIB, November 4th, 2022), <https://perma.cc/87DG-8TL4>. See: *ibid*, Paris Agreement, e.g.: art. 2 para. 1 and arts. 7-9.

¹²⁹ Guterres, Twitter (06:35 p.m. WIB, November 5th, 2022), <https://perma.cc/V7SQ-EDLC>. See: *ibid*, Paris Agreement, e.g.: preamble para. 9.

¹³⁰ Guterres, Twitter (11:00 p.m. WIB, October 13th, 2022), <https://perma.cc/36AG-VLLK>. See: *ibid*, Paris Agreement, e.g.: art. 7 para. 7 (c), art. 8 para. 4 (a), and in general art. 9.

¹³¹ Guterres, Twitter (06:04 p.m. WIB, November 7th, 2022), <https://perma.cc/3PQB-5ASJ>. See in general: *ibid*, Paris Agreement.

¹³² Guterres, Twitter (05:33 a.m. WIB, November 9th, 2022), <https://perma.cc/XF84-942E>. See: *ibid*, Paris Agreement, e.g.: preamble paras. 5 and 11, art. 6 para. 6, art. 7 paras. 2, 5-6, 9 (c), art. 9 para. 4, and art. 11 para. 1.

¹³³ Guterres, Twitter (08:25 p.m. WIB, November 15th, 2022), <https://perma.cc/R55H-QXVF>. See: *ibid*, Paris Agreement, e.g.: art. 2 para. 1 (a).

¹³⁴ Guterres, Twitter (07:01 p.m. WIB, November 18th, 2022), <https://perma.cc/9J96-5GTH>. See in general: *ibid*, Paris Agreement.

¹³⁵ Guterres, Twitter (10:45 p.m. WIB, November 17th, 2022), <https://perma.cc/JZ72-CCRC>. See in general: *ibid*, Paris Agreement.

¹³⁶ Guterres, Twitter (12:53 a.m. WIB, November 18th, 2022) <https://perma.cc/7XEL-V2SA>. See in general: *ibid*, Paris Agreement.

¹³⁷ (1) Guterres, Twitter (03:30 a.m. WIB, November 8th, 2022), <https://perma.cc/M2YN-84SZ>; (2) Guterres, Twitter (05:45 a.m. WIB, November 8th, 2022), <https://perma.cc/3AB4-EJXB>; and (3) Guterres, Twitter (01:05 a.m. WIB, November 9th, 2022), <https://perma.cc/BWE4-Z2BW>. See in general: *ibid*, Paris Agreement.

¹³⁸ (1) Guterres, Twitter (07:35 p.m. WIB, November 9th, 2022), <https://perma.cc/LUB6-7XFW>; and (2) Guterres, Twitter (03:14 a.m. WIB, November 10th, 2022) <https://perma.cc/E36S-SG5G>. See in general: *ibid*, Paris Agreement, see also: art. 16 para. 8.

“youth”¹³⁹, and various other groups¹⁴⁰. Furthermore, other subjects covered in Guterres’ tweets during and after the COP 27 included developed and developing countries’ collaboration with respect to the Climate Solidarity Pact¹⁴¹, aid to Africa¹⁴², concerns for Kilimanjaro’s future as a result of climate change¹⁴³, fossil fuel issues¹⁴⁴, clean water supply capacity¹⁴⁵, the increasing rate of sea level¹⁴⁶, loss and damage funds¹⁴⁷, early warning system to assist the vulnerable¹⁴⁸, and net zero integrity¹⁴⁹. In the context of the COP 27, Guterres, again, posted climate tweets on fossil fuels with a strong tone—for example: “Fossil fuel addiction is hijacking humanity. Renewables are the exit ramp from the climate hell highway”.¹⁵⁰

Outside the context of the COP Guterres sent tweets to the public¹⁵¹, “all countries”¹⁵², “countries & businesses”¹⁵³, and “leading economies”¹⁵⁴ voicing general support for the Paris Agreement. Guterres

¹³⁹ Guterres, Twitter (12:40 p.m. WIB, November 20th, 2022), <https://perma.cc/L55M-RNGQ>. See also: Guterres, Twitter (10:44 p.m. WIB, November 9th, 2022), <https://perma.cc/Z4MP-YSGY>. See in general: *ibid*, Paris Agreement, see also: art. 16 para. 8.

¹⁴⁰ (1) *Ibid*, Guterres, Twitter (12:40 p.m. WIB, November 20th, 2022); and (2) Guterres, Twitter (09:32 a.m. WIB, November 8th, 2022), <https://perma.cc/EJ4H-V32Q>. See in general: *ibid*, Paris Agreement, e.g.: preamble para. 11 and art. 16 para. 8.

¹⁴¹ Guterres, Twitter (01:20 a.m. WIB, 8 November 8th, 2022), <https://perma.cc/BZ4D-T8HQ>. See in general: *ibid*, Paris Agreement.

¹⁴² Guterres, Twitter (05:17 p.m. WIB, November 8th, 2022), <https://perma.cc/Q874-PRF3>. See: *ibid*, Paris Agreement, e.g.: preamble paras. 5 and 11, art. 6 para. 6, art. 7 paras. 2, 5-6, 9 (c), art. 9 para. 4, and art. 11 para. 1.

¹⁴³ Guterres, Twitter (06:00 p.m. WIB, November 12th, 2022), <https://perma.cc/W9C7-8KRR>. See in general: *ibid*, Paris Agreement, see also: preamble para. 13.

¹⁴⁴ Guterres, Twitter (09:01 p.m. WIB, November 18th, 2022), <https://perma.cc/ZU8C-8RZJ>. See in general: *ibid*, Paris Agreement, see also: preamble para. 10.

¹⁴⁵ Guterres, Twitter (08:04 a.m. WIB, November 7th, 2022), <https://perma.cc/7D5G-VTLQ>. See in general: *ibid*, Paris Agreement.

¹⁴⁶ Guterres, Twitter (07:09 p.m. WIB, November 6th, 2022), <https://perma.cc/8MQR-PPYK>. See in general: *ibid*, Paris Agreement.

¹⁴⁷ Guterres, Twitter (11:12 a.m. WIB, November 20th, 2022), <https://perma.cc/84K5-ZPPK>. See also: Guterres, Twitter (08:05 p.m. WIB, November 7th, 2022), <https://perma.cc/G25U-PWVS>. See: *ibid*, Paris Agreement, e.g.: art. 8 and preamble para. 13.

¹⁴⁸ Guterres, Twitter (10:37 p.m. WIB, November 7th, 2022), <https://perma.cc/A3RV-M2JW>. See: *ibid*, Paris Agreement, e.g.: art. 7 para. 7 (c), art. 8 para. 4 (a), and preamble paras. 5 and 11.

¹⁴⁹ (1) Guterres, Twitter (09:02 p.m. WIB, November 8th, 2022), <https://perma.cc/947P-ZYNS>; (2) Guterres, Twitter (09:01 a.m. WIB, November 9th, 2022), <https://perma.cc/9G3U-YFZP>; and (3) Guterres, Twitter (01:00 p.m. WIB, November 8th, 2022), <https://perma.cc/2JLX-YYNL>. See: *ibid*, Paris Agreement, e.g.: preamble para. 10.

¹⁵⁰ Guterres, Twitter (09:01 p.m. WIB, November 18th, 2022) (n. 144). See footnotes: 82 and 121.

¹⁵¹ E.g.: (1) Guterres, Twitter (06:40 p.m. WIB, November 14th, 2017), <https://perma.cc/Z73Q-N6H9>; (2) Guterres, Twitter (11:40 p.m. WIB, June 1st, 2017), <https://perma.cc/U3XB-CNM5>; (3) Guterres, Twitter (10:32 p.m. WIB, September 26th, 2018), <https://perma.cc/HL4U-W3NV>; (4) Guterres, Twitter (04:36 a.m. WIB, August 8th, 2021), <https://perma.cc/P7FD-E2SV>; (5) Guterres, Twitter (03:08 a.m. WIB, September 17th, 2021), <https://perma.cc/4FQ8-TYYYS>; (6) Guterres, Twitter (05:03 p.m. WIB, September 18th, 2021), <https://perma.cc/6DE9-EQG>; (7) Guterres, Twitter (02:15 p.m. WIB, February 20th, 2021), <https://perma.cc/34T9-QE5U>; (8) Guterres, Twitter (11:33 a.m. WIB, November 11th, 2020), <https://perma.cc/K2CV-68MQ>; and (9) Guterres, Twitter (05:10 p.m. WIB, December 12th, 2020), <https://perma.cc/QA4L-H6HG>. See in general: *ibid*, Paris Agreement, see also: art. 2 para. 1 (a) and preamble para. 11.

¹⁵² Guterres, Twitter (07:12 a.m. WIB, January 9th, 2022), <https://perma.cc/Q7Y9-TDE2>. See in general: *ibid*, Paris Agreement, see also: art. 2 para. 1 (a).

¹⁵³ Guterres, Twitter (06:11 p.m. WIB, June 2nd, 2017), <https://perma.cc/7Q4Z-UQ8Q>. See in general: *ibid*, Paris Agreement.

¹⁵⁴ Guterres, Twitter (03:35 a.m. WIB, September 18th, 2021), <https://perma.cc/7TU5-FC2W>. See in general: *ibid*, Paris Agreement.

addressed the G7 to implement the Paris Agreement¹⁵⁵ including in regard to climate funding¹⁵⁶; and the G20 to support the Paris Agreement¹⁵⁷ including sustainable development issues¹⁵⁸. Guterres tweeted support for the United States which rejoined the Paris Agreement as a State Party¹⁵⁹, for Russia and Turkey which joined the Paris Agreement as States Parties¹⁶⁰, and for India for its backing to the Paris Agreement¹⁶¹. In addition, the topics discussed by Guterres concerning the Paris Agreement included issues such as green business¹⁶², the lack of support from the air and sea transportation industry in general in the climate agenda¹⁶³, the expense of adaptation in emerging nations¹⁶⁴, nature-based solutions as an answer¹⁶⁵, raising the target of Nationally Determined Contributions¹⁶⁶, stopping the use of coal¹⁶⁷, net zero commitments¹⁶⁸, climate finance¹⁶⁹, and adaptation¹⁷⁰.

III. Conclusion

In his tweets on climate change, Guterres has addressed a wide range of topics relating to this subject. It is possible to establish a direct or indirect connection between Guterres' climate tweets and the Paris Agreement. In his climate tweets, among other things, Guterres tried to expedite the application of the Paris Agreement by its Parties. Furthermore, the tweets also function as a reminder to Parties to the Paris Agreement to fulfil the treaty. Guterres has never posted a tweet that opposes the Paris Agreement. All of Guterres' climate-related tweets support and promote the Paris Agreement either directly or indirectly. The climate tweets posted by Guterres are available to the general public and may be seen by anyone who has

¹⁵⁵ Guterres, Twitter (08:53 p.m. WIB, June 10th, 2021), <https://perma.cc/KZ7P-MPTB>. See in general: *ibid*, Paris Agreement.

¹⁵⁶ (1) Guterres, Twitter (02:05 a.m. WIB, June 14th, 2021), <https://perma.cc/7VZC-LL7N>; and (2) Guterres, Twitter (01:59 p.m. WIB, June 21st, 2021), <https://perma.cc/53LK-EJ2R>. See: *ibid*, Paris Agreement, e.g., in general: art. 9.

¹⁵⁷ Guterres, Twitter (10:24 p.m. WIB, July 25th, 2021), <https://perma.cc/44K6-WB2G>. See in general: *ibid*, Paris Agreement. See: *ibid*, Paris Agreement, e.g.: art. 2 para. 1 (a).

¹⁵⁸ (1) Guterres, Twitter (01:04 a.m. WIB, December 2nd, 2018), <https://perma.cc/5HZA-UV5V>; and (2) Guterres, Twitter (02:30 a.m. WIB, December 2nd, 2018), <https://perma.cc/EEB3-THR4>. See: *ibid*, Paris Agreement, e.g.: preamble para. 8, art. 2 para. 1, art. 4, art. 6 paras. 1-2 and 4 (a), paras. 8-9, art. 7 para. 1, art. 8 para. 1, art. 10 para. 5.

¹⁵⁹ Guterres, Twitter (04:35 a.m. WIB, February 20th, 2021), <https://perma.cc/2SY4-QL9M>. See also: Guterres, Twitter (06:14 a.m. WIB, January 21st, 2021), <https://perma.cc/EK34-5P8P>. See in general: *ibid*, Paris Agreement, see also: art. 20.

¹⁶⁰ (1) Guterres, Twitter (04:22 a.m. WIB, October 16th, 2019), <https://perma.cc/2HFK-2L82>; and (2) Guterres, Twitter (01:14 a.m. WIB, October 8th, 2021), <https://perma.cc/JF8G-AH9R>. See also: Guterres, Twitter (10:54 p.m. WIB, July 10th, 2019), <https://perma.cc/2VD9-GH3C>. See in general: *ibid*, Paris Agreement, see also: art. 20.

¹⁶¹ Guterres, Twitter (07:00 p.m. WIB, November 30th, 2018), <https://perma.cc/D7M5-MTN2>. See in general: *ibid*, Paris Agreement.

¹⁶² Guterres, Twitter (09:42 a.m. WIB, December 30th, 2017), <https://perma.cc/UQZ5-ERCR>. See: *ibid*, Paris Agreement, e.g.: preamble 10.

¹⁶³ Guterres, Twitter (05:00 a.m. WIB, October 15th, 2021), <https://perma.cc/4MHX-DU3L>. See: *ibid*, Paris Agreement, e.g.: art. 2 para. 1 (a) and preamble para. 10.

¹⁶⁴ Guterres, Twitter (02:47 a.m. WIB, October 21st, 2018), <https://perma.cc/T7BP-MSUK>. See: *ibid*, Paris Agreement, e.g.: in general art. 7.

¹⁶⁵ Guterres, Twitter (05:31 p.m. WIB, December 6th, 2020), <https://perma.cc/GC68-EAU7>. See: *ibid*, Paris Agreement, e.g.: in general art. 5.

¹⁶⁶ Guterres, Twitter (08:27 p.m. WIB, February 26th, 2021), <https://perma.cc/RB43-MW2A>. See: *ibid*, Paris Agreement, e.g., in general: arts. 3-4, 7, 9-11, and 13.

¹⁶⁷ Guterres, Twitter (11:17 a.m. WIB, June 3rd, 2021), <https://perma.cc/HG9G-B3BK>. See: *ibid*, Paris Agreement, e.g.: preamble para. 10.

¹⁶⁸ Guterres, Twitter (11:30 p.m. WIB, December 12th, 2020), <https://perma.cc/28KX-ZKSR>. See also: Guterres, Twitter (07:50 p.m. WIB, December 5th, 2020), <https://perma.cc/MR2G-XCW5>. See in general: *ibid*, Paris Agreement.

¹⁶⁹ *Ibid*, Guterres, Twitter (07:50 p.m. WIB, December 5th, 2020). See in general: *Ibid*, Paris Agreement, e.g.: art. 9.

¹⁷⁰ *Ibid*, Guterres, Twitter (07:50 p.m. WIB, December 5th, 2020). See in general: *ibid*, Paris Agreement, e.g.: in general art. 7.

access to Twitter. It should be noted that Guterres' tweets are directed not only to the Parties to the Paris Agreement, those who are following him on Twitter, and the parties he explicitly addresses, but also to the public in general, especially those who have access to Twitter.

In general, the climate tweets disseminated by Guterres exhibit consistency in expressing support for the Paris Agreement. There are multiple areas in which Guterres might enhance the efficacy of the Paris Agreement by using his climate tweets. For instance, the bold nature of some Guterres climate tweets, as observed in the preceding discussions, acts as a means to overcome the deadlock on an issue but in a less formal manner. Furthermore, it is necessary to raise the level of collaboration with more countries and other stakeholders in order to expand the dissemination of climate tweets. Moreover, there is a need for greater dissemination of achievements related to the successful execution of the Paris Agreement in specific nations and industries.