

**BLAVATNIK SCHOOL OF GOVERNMENT**

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# **IMPLEMENTING A DECLARATION ON FUTURE GENERATIONS**

TOOLS AND RESOURCES FOR POLICYMAKERS

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## EXECUTIVE SUMMARY

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Countries will likely agree to further their efforts to safeguard future generations through a Declaration on Future Generations, annexed to the Pact for the Future to be adopted at the UN Summit of the Future in September 2024.

Ultimately, the success of the Declaration will depend on its ability to catalyze implementation at the national and subnational levels, across all parts of government, and across society more generally.

This policy brief outlines what implementing such a Declaration could mean in practice by identifying key policy tools around the world that policymakers are already using to safeguard future generations. These include informational tools, strategic foresight, goal-setting, representatives for future generations, trustees (especially courts), reserves, catalytic institutions that seed small interventions that grow over time, and tools to extend time horizons, including citizen assemblies.

Policy reforms and tools to protect future generations are highly diverse, spanning all areas of policymaking and ranging from small shifts in processes to the creation of entirely new institutions. The tools briefly summarised in this memo are not comprehensive, but rather seek to give a representative flavor of what implementing a Declaration on Future Generations might look like in practice.

Moreover, there is no single model for countries to follow, as tools to protect future generations must be appropriate for the contexts in which they operate. However, because all governments struggle with the challenge of overcoming short-termism, there is enormous value in learning from diverse experiences of different policy tools around the world. Catalyzing such exchanges could be one key way in which the Declaration on Future Generations and related tools to help implement it, such as a UN envoy for future generations and a multilateral forum on the subject, could provide concrete benefits to member states.



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## CONTEXT

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A landmark United Nations report, Our Common Agenda, commissioned for the international body's 75th anniversary, considers ways through and beyond the stream of present crises. One of its key proposals is for states to issue a Declaration on Future Generations and commit to institutional reforms that give it weight. If successful, it could mark an inflection point in longstanding multilateral efforts to manage crises and place long-term sustainable development on secure foundations.

Countries are currently engaged in negotiations on a **Declaration on Future Generations**, one of the expected headline outcomes of the UN [Summit of the Future](#) to be held in September 2024.

The Declaration would be a major multilateral statement affirming future generations' responsibility to protect future generations' needs and interests. It is intended to respond to present challenges, which, if left unaddressed, will have dire consequences for future generations, while also **encouraging far-sighted action to leave a better legacy for our successors**.<sup>1</sup>

As with any multilateral declaration, **national and sub-national implementation is key** for its success. The Summit of the Future may create **tools to support national implementation such as a UN Envoy for Future Generations** and a **Forum** in the UN system for countries to discuss the topic. Such multilateral tools can help countries to exchange best practices and build capacity. Ultimately, the Declaration will be effective to the extent that it can catalyse meaningful changes and actions across all levels of governance to safeguard future generations.

**What does safeguarding future generations mean in practice?** The question can be difficult to answer because the topic is potentially so broad, cutting across all areas and levels of governance. Moreover, there is no "one size fits all" solution. Rather, institutions and actions to protect future generations must be appropriate for different national and local contexts in order to be effective. However, there is significant scope for countries to share experiences and learn from each other. Indeed, one of the benefits of catalysing action around future generations through a Declaration is to encourage innovation and experimentation through which countries could both seek the models that work best for them and learn relevant lessons from others' experiences.

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<sup>1</sup> More information on the Declaration and its purpose: [Hale et al \(2023\). Toward a Declaration on Future Generations. Blavatnik School of Government, University of Oxford.](#) [Our Common Agenda \(2023\). To Think and Act for Future Generations \(Policy Brief\).UN.](#)



Helpfully, countries have already generated a rich and varied set of experiences in safeguarding future generations. This policy brief draws on these experiences to introduce a range of tools already being deployed. This list presented here is not comprehensive, nor is it necessarily the right mix of tools for any given country. Rather, it seeks to provide an **indicative set of concrete tools and actions that policymakers looking to implement a Declaration on Future Generations might consider.**

## TOOLS FOR SAFEGUARDING THE NEEDS AND INTERESTS OF FUTURE GENERATIONS

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### 1. Incorporating information on future impacts into decision-making

A basic condition for safeguarding future generations is to understand the future impacts of our actions today and to make this information salient in our decision-making. This can be done through a wide range of tools, some of which are specific to certain issue areas (e.g. climate or fiscal policy), while others address a wide range of issues.

#### 1.1. *National climate advisory bodies, and the Intergovernmental Panel on Climate Change*

Climate change committees and expert bodies increasingly support decision-makers to adapt their policies to future challenges. The Intergovernmental Panel on Climate Change (IPCC) is widely regarded as the most authoritative source of information on future climate outcomes. With thousands of authors and sign-off from every government worldwide, IPCC reports have become so influential that they shape the way the climate problem is conceptualised by political actors. At the national level, an increasing number of national jurisdictions, such as China, South Africa, and Chile, have established national or subnational bodies to provide similar information. For example, the [UK Climate Change Committee](#) creates significant analytical and forward-looking resources, thus shaping climate policy processes actively at the national level<sup>2</sup>. By providing information about future climate trends and impacts into policymaking processes, these kinds of bodies help decision makers better understand the needs and interests of future generations.

#### 1.2. *Regulatory impact assessments and the social cost of carbon (USA)*

Environmental impact assessments (EIAs) have become widespread across the world since the 1970s, seeking to understand the potential environmental consequences of projects or actions. Many countries have also included environmental or climate criteria in regulatory impact assessments (RIAs), which

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<sup>2</sup> Hale, T. (2024). *Long problems: Climate change and the challenge of governing across time*. Princeton University Press. P 74-75



assess forthcoming laws and regulations for various impacts on sustainability<sup>3</sup>. In the United States, for example, RIAs for proposed rules must consider the "social cost of carbon" - an attempt to quantify future climate change harms via integrated assessment models and account for it in current regulatory decisions. Automatically incorporating future-focused impacts into cost-benefit analysis helps decisionmakers better understand and address intergenerational impacts, trade-offs, and priorities.

### *1.3. Budgetary review offices.*

One common way governments incorporate information on future impacts into decision-making is through budgetary review offices. For example, in the United States, the Congressional Budget Office (CBO) provides independent, nonpartisan cost estimates for proposed legislation, showing how revenue and spending would change from a baseline if a new law is enacted. The CBO's analysis carries significant weight in American politics due to its institutional authority and the importance placed on fiscal responsibility. Similarly, in the United Kingdom, the Office of Budget Responsibility assesses the future fiscal impacts of policy decisions, ensuring that the government considers the long-term implications of its spending and revenue measures. Similar bodies can be found in nearly every government around the world, though they differ in organizational form, mandate, and influence. Still, their wide usage shows that incorporating informational tools that have the potential to serve future interests is already widely practiced.

## **2. Strategic Foresight**

Strategic Foresight covers practices exploring future possibilities and challenges that support decision-making processes to prepare better for the future. Strategic Foresight helps decision-makers to open discussion about possible trajectories (e.g., the future of) and the pathways that could lead to them. In that way, strategic Foresight enhances the capacity to anticipate forthcoming challenges, opportunities and trade-offs, and helps decision-makers to apprehend uncertainties inherent to our changing world. These practices encourage decision-makers and stakeholders to create participatory and inclusive forms of planning and goal-setting that incorporate technical and non-technical knowledge.

### *2.1. Singapore Centre for Strategic Futures*

[Singapore's Centre for Strategic Futures](#)<sup>4</sup> is a futures research organisation within the government of Singapore. It focuses on identifying emerging trends and potential disruptions that could have significant strategic implications for them. Established in 2009, this think tank aims to conduct studies exploring the long-term, experiment innovative foresight methodologies, and build anticipatory capabilities across the public sector. While part of the government, the organisation operates independently to achieve these objectives. Currently positioned under the Prime

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<sup>3</sup> Jacob, K., S. Weiland, J. Ferretti, D. Wascher and D. Chodorowska (2011). *Integrating the environment in Regulatory Impact Assessments*. Paris: OECD.

<sup>4</sup> The Centre for Strategic Futures, URL: <https://www.csf.gov.sg/>



Minister's Office Strategy Group, the Centre has the advantage of being able to collaborate with a wide range of government agencies, allowing it to integrate its work across various domains.

## 2.2. *Finland's Committee for the Future*

Since 1993, the Finnish parliament has hosted a Committee for the Future, a cross-party group tasked with examining long-term challenges facing the country, including commissioning reports on topics like the future of technology and climate change. This committee responds to the government's Report on the Future, prepared by the Prime Minister's office through a cross-ministry working group each electoral term. All ministries support this Foresight work through the Government Foresight Group and the National Foresight Network, which encompasses stakeholders from various sectors, engaging the entire Finnish policymaking apparatus in thinking through potential future pathways<sup>5</sup>.

## 2.3. *Nos Aruba 2025*

In Aruba, around 60% of the country's entire population, spanning from primary school children to pensioners, participated in developing a shared vision for Aruba's future called Nos Aruba 2025. The objective was to institutionalise an integrated and strategic planning process that encourages coordination among stakeholders and considers sustainable development guidelines. In 2008 - 2009, the nation collectively answered key questions to discover, dream, design and determine a path towards their preferred future through various participatory methods like workshops and social media<sup>6</sup>.

## 3. **Goal-setting**

Goal-setting allows policymakers to set priorities amongst competing objectives and to support policy stability over extended periods of time. When setting goals, countries must determine the right balance between locking in long-term priorities and allowing flexibility and updating, and institutionalise this balance through a mix of provisions that both take some decisions out of current policy makers hands and provide ways to shift goals as needs evolve.

### 3.1. *Net Zero 2050 goal in law (UK Climate Change Act)*

The UK Climate Change Act of 2008 establishes a comprehensive framework for reducing greenhouse gas emissions and adapting to climate change risks. It mandates significant reductions in emissions by 2050, with the ultimate goal of achieving net zero emissions by that time. To guide progress, the Act requires the setting of legally-binding "carbon budgets" every five years, with advice from the

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<sup>5</sup> Hale, T. (2024), *ibid*, p 51.

<sup>6</sup> Glenday, P, Ramakrishnan, K, California 100, and School of International Futures (2023). *Beyond Strategic Planning: A Foresight Toolkit for Decision Makers*. University of California.



Committee on Climate Change, and places an obligation on the government to implement policies to meet these targets.<sup>7</sup> In this way the long-term direction of policy is fixed across elections, though it remains for each government to determine how best to meet its objective.

### 3.2. *African Union's Agenda 2063*

Agenda 2063 is Africa's strategic blueprint and master plan for transforming the continent into a global powerhouse over the next 50 years (from 2013 to 2063). It aims to deliver inclusive and sustainable development through continental and regional integration, democratic governance, and peace and security, representing Africa's vision of becoming an integrated, prosperous and peaceful force driven by its own citizens on the international arena. The agenda encapsulates Africa's aspirations, identifies key flagship programs to boost economic growth, and outlines 10-year implementation plans to achieve transformational outcomes.<sup>8</sup>

### 3.3. *Saudi Arabia's Vision2030*

Saudi Arabia's Vision 2030 roadmap aims to leverage the country's strategic location connecting three continents, its investment power, and its status as the heart of the Arab and Islamic worlds to build a thriving diversified economy, vibrant society, and ambitious nation. The vision comprises three pillars representing Saudi Arabia's competitive advantages and outlining goals for enhancing government effectiveness, increasing job opportunities through a thriving, diversified economy, and strengthening Islamic roots and national identity to create a vibrant society<sup>9</sup>. It is the guiding framework for investment of the country's resource wealth, seeking to establish a stable platform for prosperity into the future.

### 3.4. *China's five-year plans*

China has institutionalised goal-setting as a central component of its policymaking process through five-year plans that outline core social, economic, and environmental objectives with specific, quantified targets. The 14th 5-year plan issued in 2021 contained targets on areas like emissions reductions, renewable energy deployment, and afforestation, which are then broken down into sectoral plans and assigned to ministries and other entities for implementation. While focused on 5-year increments, the plans also enshrine many of China's longer-term targets for 2035 and beyond related to economic growth, technology, sustainability and other priorities.<sup>10</sup>

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<sup>7</sup> The UKCCC, URL: <https://www.theccc.org.uk/what-is-climate-change/a-legal-duty-to-act/>

<sup>8</sup> African Union, Agenda 2064, URL: <https://au.int/en/agenda2063/overview>

<sup>9</sup> Kingdom of Saudi Arabia, Vision 2030, URL: <https://www.vision2030.gov.sa/en/vision-2030/overview/>

<sup>10</sup> Hale, T (2024), *ibid*, p 106-107.



## **4. Representatives for future generations**

Many countries and sub-national governments have sought to create voices for future generations in policymaking by creating official positions mandated to represent them. These representatives of future generations can take the form of stand-alone offices, legislative committees, individual “champions,” or other arrangements.

### *4.1. Future Generations Commissioner of Wales*

The Future Generations Commissioner of Wales serves as the guardian of future interests, ensuring that public bodies and policymakers in Wales prioritise long-term impacts in their decision-making processes. This entails addressing significant challenges such as the potential job displacement due to technological advancements and promoting strategies for fostering healthy and sustainable living. Through advisory roles and the ability to conduct reviews, the Commissioner aims to encourage collaboration and drive systemic changes towards a more future-focused approach to governance<sup>11</sup>.

### *4.2. Maltese Guardian of Future Generations*

The Guardian of Future Generations in Malta, established under Article 8 of the Sustainable Development Act, Cap. 521, is tasked with ensuring intergenerational and intragenerational sustainable development. Recognising the vital role of voluntary organizations and the environmental dimension, the Guardian seeks to promote policies that guarantee the well-being and equitable opportunities for all citizens, including future generations. Through a rights-based, research-driven approach and strategic collaborations, the Guardian aims to advance sustainable change, focusing on priority areas such as sustainable urban development, community engagement, and ensuring safety and security for all in the built environment<sup>12</sup>.

## **5. Trusteeship and the role of courts**

Beyond simply representing future generations in decision-making, decision-makers are empowering certain institutions that are relatively isolated from short-term pressures to require the protection of future generations in current decision-making. Courts have been very active in this regard.

### *5.1. Climate litigation*

Because courts are relatively insulated from the short-term pressures that politicians face, they have the capacity to act in the longer-term interest. In recent years this potential has been increasingly realised with respect to climate. A surge in climate

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<sup>11</sup> Future Generations Commissioner of Wales, URL: <https://www.futuregenerations.wales>

<sup>12</sup> Guardian of Future Generations, URL: <https://sustainabledevelopment.gov.mt/guardian-of-future-generations>



litigation across various jurisdictions targets both companies and governments, doubling in number from 2015 to 2021<sup>13</sup>. Courts in the Netherlands have notably ruled in favour of climate action, ordering the government and a major oil company to increase climate ambition (*Urgenda Foundation v. State of the Netherlands*). In the USA, cases like *Juliana v. the United States* address the harm of government inaction, while in Colombia, youth successfully petitioned the Supreme Court to address deforestation in the Amazon. Additionally, in Germany, a youth group sued the government to enhance its near-term emissions targets, citing unfairness in delaying necessary measures<sup>14</sup>.

## **6. Reserves and resilience**

Reserves allow countries to manage future uncertainties. By building up such resources, which may be monetary (e.g. a sovereign wealth fund), physical (e.g. protecting biodiversity to preserve potential future medicines), or social (e.g. increasing social trust to manage better future disruptions that may result from climate change or other risks), countries make themselves more resilient.

### *6.1. Norway sovereign wealth fund*

In 1990, Norway established a massive sovereign wealth fund originally intended for short-term fiscal stabilisation. Over the last decades, the fund has grown into a crucial long-term revenue source, now covering 20% of Norway's budget despite conservative management. As Norway's oil and gas production declines in the coming decades due to depleting reserves and climate policies, the accumulated capital in the sovereign wealth fund will continue providing a significant fiscal boost far into the future, long after the original resource base is depleted<sup>15</sup>.

### *6.2. Investing in climate resilience*

Alongside adapting to the impacts of climate change that are already occurring, countries also need to take farsighted action that will make their societies better able to withstand future impacts. These efforts to build resilience take numerous forms, including changing physical infrastructure like ensuring buildings can withstand high heat and extreme weather, relocating people from areas at risk of extreme impacts, restoring natural systems like mangroves or urban forests that provide protection from flooding or heating, developing drought-resistant strains of crops, and investing in the human and social systems that can better prepare communities for disruptions.

While climate resilience planning and action is now increasingly common around the world, many governments remain at the initial stages of this process, and

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<sup>13</sup> Setzer, J and C. Higham (2021). *Global Trends in Climate Change Litigation: 2021 Snapshot*. London: Grantham Research Institute on Climate Change and the Environment, London School of Economics and Political Science.

<sup>14</sup> Hale, T. 2024, *ibid*, p 87.

<sup>15</sup> *Ibid*, p 124.



struggle to mobilise sufficient capacity, resources, and attention to meet the scale of the challenge. However, first-movers like the city of Durban, South Africa, which initiated resilience planning in 2004, have already developed a rich experience of approaches.<sup>16</sup> By empowering communities with the information, mandate, and resources they need to become more resilient, governments can spur action that benefits future generations.

## **7. Catalytic institutions and experimentalism**

When seeking to protect future generations, policymakers are often stymied by the uncertainty, inertia, or obstructionism that results from short-term interests in the present. Catalytic and experimental approaches help to erode these barriers over time by seeding outcomes that reduce uncertainty or build support over time.

### *7.1. The California Air Resources Board (CARB)*

The California Air Resources Board (CARB) is an example of a climate policy trustee-like institution with broad authority over air pollution and greenhouse gas emissions regulation in the state. Established in 1967, CARB sets plans and rules to achieve California's long-term climate goals like carbon neutrality by 2045, while operating programs like the cap-and-trade market on a day-to-day basis. CARB has relatively high independence as its multi-member board has staggered terms and expertise requirements, along with a dedicated funding stream separate from the legislature<sup>17</sup>.

### *7.2. Paris Agreement*

The Paris Agreement sets global goals agreed by all nations for limiting temperature rise. It mobilises first movers through flexible, nationally determined contributions rather than internationally negotiated commitments. It iterates by requiring new contributions every five years, allowing increasing ambition over time. And it aims to increase path dependence by locking in and amplifying prior climate actions to make subsequent, stronger actions more likely<sup>18</sup>.

## **8. Extending time horizons**

### *8.1. Shifting economic valuation*

Reformers have proposed shifting economic valuation away from narrow measures like GDP towards more holistic indicators incorporating environmental and social welfare (Hale, 2024, p 92)<sup>19</sup>. Examples include the Wellbeing Economy Alliance's

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[https://www.durban.gov.za/City\\_Services/development\\_planning\\_management/environmental\\_planning\\_climate\\_protection/Publications/Documents/Durbans%20Municipal%20Climate%20Protection%20Programme\\_Climate%20Chan.pdf](https://www.durban.gov.za/City_Services/development_planning_management/environmental_planning_climate_protection/Publications/Documents/Durbans%20Municipal%20Climate%20Protection%20Programme_Climate%20Chan.pdf)

<sup>17</sup> *Ibid*, p 84-85

<sup>18</sup> *Ibid*, p 64-68.

<sup>19</sup> *Ibid*, p 92.



framework prioritising environmental performance, human needs, equality and governance alongside economic output<sup>20</sup>. While challenging existing powerful interests, mainstreaming alternative measures could gradually realign policies and preferences over the long-term by redefining what constitutes economic "success."<sup>21</sup> .

### 8.2. *Citizen assemblies*

In recent years, climate assemblies have emerged - local or national groups of citizens who gather to deliberate on how to address climate change in their community or society<sup>22</sup>. These assemblies, which can be formally established by political leaders or arise from grassroots movements, aim to create deliberative processes where ordinary citizens grapple with climate issues and provide policy recommendations. Proponents see them as improving democratic decision-making by surfacing informed public opinion, building social buy-in for trade-offs, and giving voice to underrepresented interests on complex long-term issues like climate change. Examples include the French Citizens Convention on Climate, Germany's Citizen's Assembly on Climate, Climate Assembly UK, and the Irish Citizens' Assembly among others.

### 8.3. *Constitutional measures and laws to protect future generations*

One approach to safeguarding the needs and interests of future generations is known as "Legal long-termism"<sup>23</sup>. This involves translating intergenerational norms into binding laws and precedents through strategic litigation and the creation of new<sup>24</sup> international/domestic legal provisions that explicitly extend rights and considerations to people who are yet to be born. It is worth noting that around **41% of written constitutions already contain provisions concerning future generations**, indicating a growing recognition of their importance in policy-making<sup>25</sup>. Several legislative initiatives focused on protecting long-term interests have also emerged, such as Wales' Well-being of Future Generations Act (2015) and New Zealand's Public Service Act (2020).

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<sup>20</sup> Costanza, R. (2017). "Toward a Sustainable Wellbeing Economy". *Solutions Journal* Special Issue.

<sup>21</sup> Hale, T (2024), *ibid*, p 93

<sup>22</sup> Hellmann, G. (2020). "How to Know the Future - and the Past (and How to Not)." In *The Politics and Science of Prevision: Governing and Probing the Future*, ed. A. Wenger, U. Jasper, and M.Dunn Caveltly, 45-62. London: Routledge.

<sup>23</sup> Campbell, J.L. (2004). *Institutional Change and Globalization*. Princeton, NJ Princeton University Press.

<sup>24</sup> Hale, T (2024), *ibid*, p 88.

<sup>25</sup> Pierson, P. (2004). *Politics in Time: History, Institutions, and Social Analysis*. Princeton, NJ: Princeton University Press.



## HOW TO FIND OUT MORE

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Key organisations supporting governments to safeguard future generations

- **Network of Institutions for Future Generations**

[The Network of Institutions for Future Generations](#) is a network of public institutions promoting the protection of future generations. The organisation's purpose is to offer a space for knowledge sharing across diverse public institutions. Its role has been analyzed in [a report written by the Zoe Institute<sup>26</sup>](#).

- **OECD Strategic Foresight Unit**

The [OECD Strategic Foresight Unit](#) supports governments in building anticipatory governance capabilities, and serves as a knowledge center with the production of Foresight reports.

- **School of International Futures**

The [School of International Futures](#) plays a catalytic and supportive role in helping practitioners strengthen and expand on the work of the UN Summit and other related efforts to build better futures. SOIF weaves its network in the lead-up to the Summit of the Future through two main channels:

- **The Futures Pioneers Networks** convenes and supports early-adopter governments to strengthen their anticipatory governance capabilities.
- **The [Pledge Network](#)**, an informal collective of more than 70 cross-disciplinary leaders with expertise across futures, foresight, anticipatory governance, wellbeing and future generations policy.

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<sup>26</sup> Dirth, E. and Kormann da Silva, N. (2022). "Building Our Common Future: The role of the Network of Institutions for Future Generations in safeguarding the future". ZOE Institute for Future-fit Economies, Cologne.



## Resources

### Toolkits

- **Future Generations FAQ**

The Foundations for Tomorrow has developed a comprehensive [Future generations FAQ](#)<sup>27</sup>, that answers practical questions about the Summit of the Future, the Declaration on Future Generations, and the Future Generations agenda in general.

- **Intergenerational Fairness Policy Toolkit**

The School of International Futures and the California 100 Initiative have designed an [Intergenerational Fairness Toolkit](#)<sup>28</sup> to help policymakers design policies for current and future generations.

- **Future Generations Policy Leaders Toolkit**

The [Futures Generations Policy Leaders toolkit](#) is a podcast powered by the Office of the Future Generations Commissioner for Wales with Foundations for Tomorrow. It explores practical steps for future generations governance implementation, drawing on Wales's learning journey.

### Books and Research Papers

- Jonathan Boston, Professor of Public Policy at Victoria University of Wellington, New Zealand explores how short-termism in policy-making can be mitigated in his book [Governing for the Future: Designing Democratic Institutions for a Better Tomorrow](#).<sup>29</sup>
- Malcolm Fairbrother, Professor of Sociology, has examined public opinions on Future Generations governance in 6 countries in a research paper: [Potential Institutions for Future Generations \(IFGs\): What Do Current Generations Think?](#)<sup>30</sup>
- Thomas Hale, Professor of Global Public Policy at the Blavatnik School of Government explores how long-term governance and futures-oriented policy thinking can tackle [“Long Problems” spanning over generations in his newest book](#)<sup>31</sup>, elaborating on the example of the long problem that is climate change.

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<sup>27</sup>Foundation for Tomorrow (2023), Future Generations FAQ.

<sup>28</sup> Glenday, P, Ramakrishnan, K, California 100, and School of International Futures (2023). *ibid*

<sup>29</sup> Boston, J. (2016). *Governing for the Future: Designing democratic institutions for a better tomorrow*. In Public policy and governance.

<sup>30</sup> Fairbrother, M. (2024). *Potential institutions for future generations: What do current generations think?* Institute for Futures Studies, Stockholm/Uppsala University

<sup>31</sup> Hale, 2024, *ibid*.