

From: [REDACTED]  
To: [IPCN Enquiries Mailbox](#)  
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I write to comment on the IPC condition that Glencore prepare an export management plan showing how it would “use its best endeavours” to ensure any coal extracted from the mine only be exported to signatories to the Paris deal, or to countries that have similar policies in place aimed at minimising greenhouse gas emissions.

This sounds excellent until we remember that most countries are signatories to, and have ratified, the Paris Agreement.

However, there remains a huge disconnect between countries’ Paris Commitments and achieving the Goals of the Paris Agreement. Moreover the use of “best endeavours opens a huge loophole for the company to plead despite “best endeavours” they are unable to meet this goal.

Despite the number of signatories to the Paris Agreement, it is a fact that; under current commitments, the world is on track for more than 3C of global heating, [well beyond what was promised in the Paris agreement.](#)

The use of the clause to ensure that all “practicable” measures are adopted by the applicant to minimise greenhouse gas emissions opens the door to the Company pleading that costs would be prohibitive, thus negating the positive financial benefits.

This argument (excuse) has previously been utilised by the industry to justify leaving huge toxic final voids ( Warkworth Mining Ltd with regard to the proposed final void to be left at Warkworth mine)

Whilst superficially this condition appears to bind the Company to limiting Scope 3 emissions it is plain that the condition can be easily overcome whilst carrying on “Business as Usual”

Judith Leslie

