To: ABN Amro, ANZ, Banco Bilbao Vizcaya Argentaria (BBVA), Bank of America, Bank of China, Barclays, BMO Financial Group, BNP Paribas, CIBC, Citigroup, Commerzbank, Commonwealth Bank of Australia, Crédit Agricole, Credit Suisse, Daiwa Securities, DBS, Deutsche Bank, DZ Bank, First Abu Dhabi Bank, Goldman Sachs, Groupe BPCE, HSBC, ICICI Bank, Industrial and Commercial Bank of China, ING, Intesa Sanpaolo, JBIC, JPMorgan Chase, La Caixa Group, Mitsubishi UFJ Financial, Mizuho Financial, Morgan Stanley, National Australia Bank, NatWest, Norinchukin Bank, Rabobank, Royal Bank of Canada, Santander, Scotiabank, Skandinaviska Enskilda Banken, SMBC Group, Société Générale, Standard Chartered, State Bank of India, Sumitomo Mitsui Trust, Toronto, Dominion Bank, UBS, UniCredit, United Overseas Bank, Westpac

CONCERNING: END SUPPORT FOR COMPANIES BUILDING NEW METALLURGICAL COAL CAPACITY

December 7th, 2023

Dear Darryl White,

We, the undersigned 67 organisations, are writing to call on BMO Financial Group to end support for both projects and associated companies developing new metallurgical coal mining projects. *Metallurgical* coal ('met coal'), to be distinguished from *thermal* coal used in power generation, is coal that is used for industrial production, mostly for steel production. In the wake of an escalating climate catastrophe, it is essential that other energy sources are identified for both steelmaking and power generation, and that *all* coal remains in the ground.

Coal is by far the <u>greatest source of greenhouse gas emissions</u> causing the climate crisis, responsible for 40% of emitted GHG in 2021. Due to its reliance on coal, the steel sector emits <u>7%</u> of global GHG and <u>11%</u> of CO2.¹ Moreover, the use of coal comes with <u>broad threats</u> to human health. To bring down these emissions, it is essential that the steel industry redresses its reliance on met coal and uses <u>existing decarbonisation solutions</u>.

Overall, banks contribute a fair share to emissions associated with steelmaking, as since 2016 they have collectively provided at least <u>US\$557 billion</u> in loans and underwriting to the biggest developers of met coal.

Since 2016 your bank has provided a total of US\$4.7 billion to the 50 biggest developers of the metallurgical coal sector through lending and bond underwriting.

¹ Apart from CO2 there are other gases contributing to planet boiling which explains this gap.

As a major lender to both steel - and coal mining companies, your bank must actively take part in decarbonisation efforts for the steel sector, by refusing to perpetuate the sector's reliance on coal, and by facilitating the transition to cleaner technologies instead.² This requires that you exclude finance for new metallurgical coal mining projects.

Since the 2015 Paris Agreement, almost <u>250</u> financial institutions have adopted policies to exclude *thermal* coal from their finance. But so far, only <u>nine large banks</u> have committed to some restrictions on financing *metallurgical* coal. These policies mostly focus on project finance, and rarely cover finance at the corporate level or on expansion. Hereby, it needs to be added that project finance plays only a very minor role as from 2016 onwards it accounted for <u>only 1.4% of financing for met coal</u>. Alarmingly, the broad absence of effective policies means that banks are still overlooking the impact of <u>one-seventh</u> of the world's produced coal. This is not acceptable given the detrimental impacts of met coal on communities, nature, and the climate.³ To improve public health, and to limit global warming to 1.5°C, banks must <u>adopt policies</u> that leave no room for further coal-based mining expansion.

Decreasing demand for met coal requires that banks support their steel-producing clients' transition to fossil free technologies, by providing credit for such a transition but also by making the availability of this credit conditional on steel companies committing to a time bound transition plan. Fortunately, there is a <u>faster technology transition</u> than expected by industry experts. According to German think tank Agora Industry, a <u>full coal phase out in steel production</u> is technologically feasible "by the early 2040's". This makes clear that industry and technology are ready for a transition to carbon free steel making. Additionally, in their <u>Roadmap for the Global Energy Sector</u>, the International Energy Agency (IEA) states that "existing sources of [met coal] production are sufficient to cover demand through to 2050". Hence, there is no reason for any further expansion of met coal production through the opening of new mines. However, as shown in the <u>report</u> by Reclaim Finance, there are still too many met coal projects planned, posing serious threats to any credible efforts of staying within a 1.5°C frame.

Now is the time for BMO Financial Group to include metallurgical coal in their coal phase out plans. We call on your bank to commit to stop financing ongoing carbon lock-in in steel production through the continuous expansion of metallurgical coal capacities. Instead, you should increase your lending to key enabling sectors for the steel industries transition. More specifically we call upon your bank to:

 Immediately end all dedicated financial services, including advisory services to metallurgical coal projects. This includes the development of new metallurgical coal mines; the expansion of existing ones, and all related infrastructure.

² See page 5 of our more in-depth <u>briefing on met coal</u> for examples

³ These include its effects on <u>planet boiling</u> and <u>nature</u> but also <u>health</u> and <u>affected communities</u>

2. Committing to no longer provide financial services to companies that have plans to develop or are developing metallurgical coal projects. This includes no longer providing services to companies that do not have a detailed asset-by-asset and mine-by-mine closure (and not selling) timetable aligned with a 1.5°C scenario, and a just and sustainable transition and decommissioning plan for workers, local communities, and the environment.

We will continue to carefully monitor and evaluate all policy steps taken by banks globally with regards to both met coal and the steel industry. We kindly seek a **response** from your bank on this call by **January 31st**, at the latest.

We thank you in advance for your bank's willingness to put an end to the use of all coal and for endorsing your partners in the steel industry in their path towards carbon-neutrality through advisory and the provision of transition finance.

Sincerely,

- 1. 350.org Australia
- 2. ActionAid Denmark
- 3. ARRCC (Australian Religious Response to Climate Change)
- 4. Bank Climate Advocates
- 5. Bank.Green
- 6. BankTrack
- 7. Beyond Fossil Fuels
- 8. BreakFree Suisse
- 9. Breathe Project
- 10. CEE Bankwatch Network
- 11. Center for ecology and sustainable development (CEKOR)
- 12. Centre for Environmental Rights
- 13. Citizens Action Coalition of IN
- 14. Climate Action Network France
- 15. Climate Pledge Collective
- 16. Climate Safe Lending Network
- 17. Coal Action Network
- 18. Corporate Europe Observatory
- 19. Defund Climate Chaos
- 20. Democracy Watch
- 21. Ecologistas en Acción
- 22. ENVIRONICS TRUST
- 23. Extinction Rebellion Nederland
- 24. Fair Finance International
- 25. Finance & Trade Watch
- 26. FossielvrijNL
- 27. Fridays For Future Climate Justice Project

- 28. Friends of the Earth England, Wales & Northern Ireland
- 29. Friends of the Earth Finland
- 30. Gas No Es Solución
- 31. Germanwatch
- 32. Global Action Plan Polska Foundation
- 33. Green Advocates Liberia
- 34. Green Alliance
- 35. Group Against Smog & Pollution
- 36. Inclusive Development International
- 37. Industrious Labs
- 38. Institute for Sustainable Development Foundation
- 39. Instituto Internacional de Derecho y Medio Ambiente (IIDMA)
- 40. Leave it in the Ground Initiative (LINGO)
- 41. Les Acteurs de la finance responsable
- 42. London Mining Network
- 43. Mackay Conservation Group
- 44. Make My Money Matter
- 45. MarketForces
- 46. Mighty Earth
- 47. Mining watch Serbia (KORS)
- 48. Open Plan Foundation
- 49. Positive Money Europe
- 50. Positive Money UK
- 51. Rainforest Action Network
- 52. Reclaim Finance
- 53. ReCommon
- 54. Recourse
- 55. Scientists for Global Responsibility
- 56. Sierra Club
- 57. Social Ecological Institute Społeczny Instytut Ekologiczny
- 58. Solutions for Our Climate (SFOC)
- 59. Stand.earth
- 60. SteelWatch
- 61. Stowarzyszenie (Association) BoMiasto
- 62. Stowarzyszenie Ekologiczne EKO-UNIA
- 63. Third Act
- 64. Tipping Point UK
- 65. Toxic Bonds Initiative
- 66. Urgewald
- 67. Women's Earth and Climate Action Network



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