

# Citi: Funding Fossil-Fueled Environmental Racism in the Gulf South



SEPTEMBER 2024

**STAND**.earth



**HIP HOP CAUCUS**



**STOP THE MONEY PIPELINE**



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“ Participating in this report has compelled me even more to bring attention to the deeply troubling reality of environmental racism and its devastating impacts on communities like mine: low-income, Black, Indigenous, and People of Color (BIPOC) communities.

As a mother of six children, some of whom battle health issues directly caused by long-term exposure to industrial pollution, and as a survivor of multiple climate-induced disasters that once rendered my family homeless in Southwest Louisiana, this issue strikes at the core of my being.

In this report, we delve into the harsh truths surrounding environmental injustice and who is funding it. We examine the historical roots that have shaped this systemic discrimination, the structural barriers that perpetuate it, and the profound consequences it has on the health, well-being, and livelihoods of marginalized communities like mine. Through rigorous research, data analysis, and personal narratives, we aim to shed light on the interconnected web of factors that contribute to this grave injustice.

For far too long, Black, Indigenous, and low-income communities have borne the disproportionate burden of industrial pollution, hazardous waste, and other environmental hazards. Our neighborhoods are often situated in close proximity to toxic sites, contaminated water sources, and polluted air. This systemic pattern of environmental racism perpetuates a cycle of inequality, depriving individuals and families of their fundamental right to a safe and healthy environment.

As a mother, I have witnessed firsthand the devastating effects of this injustice on my children's health. Some of them battle respiratory illnesses, neurological disorders, and other chronic conditions that are directly linked to the long-term exposure to industrial pollution. The constant fear and anguish of watching my loved ones suffer under the weight of environmental hazards is an everyday reality for me, one that no family should endure.

Adding to the burden, my family has also experienced the harsh consequences of climate change-induced disasters that have uprooted our lives and made us homeless multiple times. The relentless storms, floods, and other climate events that have ravaged Southwest Louisiana have further compounded the challenges we face, leaving us vulnerable and displaced.

This report is not just a compilation of facts and figures; it is a call to action. It is a plea for justice, equity, and a better future. We must not only acknowledge the existence of environmental racism but actively work towards dismantling the systems that perpetuate it. We must advocate for policies that prioritize the well-being of marginalized communities, amplify their voices, and ensure their inclusion in decision-making processes.

**Roishetta Ozane**  
*Co-Director of the Gulf Fossil Finance Hub,  
Founder and Director of the Vessel Project of Louisiana*



ROISHETTA OZANE, FOUNDER AND DIRECTOR OF THE VESSEL PROJECT OF LOUISIANA, SPEAKS TO A CROWD AT A PROTEST OUTSIDE OF CITI'S NEW YORK HEADQUARTERS. APRIL 23, 2023. PHOTO: JUDITH CROSBIE



# Executive Summary

PHOTO TOP: COMMUNITY LEADERS FROM THE U.S. GULF SOUTH CALL ON CITI TO STOP FUNDING ENVIRONMENTAL RACISM AT AN ACTION. FROM LEFT TO RIGHT: LEO LINDER, JUSTIN FITCH, ROISHETTA OZANE, BETTE BILLIOT, MICHAEL ESEALUKA, CHLOE TORRES. APRIL 23, 2023. PHOTO: JUDITH CROSBIE

## EXECUTIVE SUMMARY

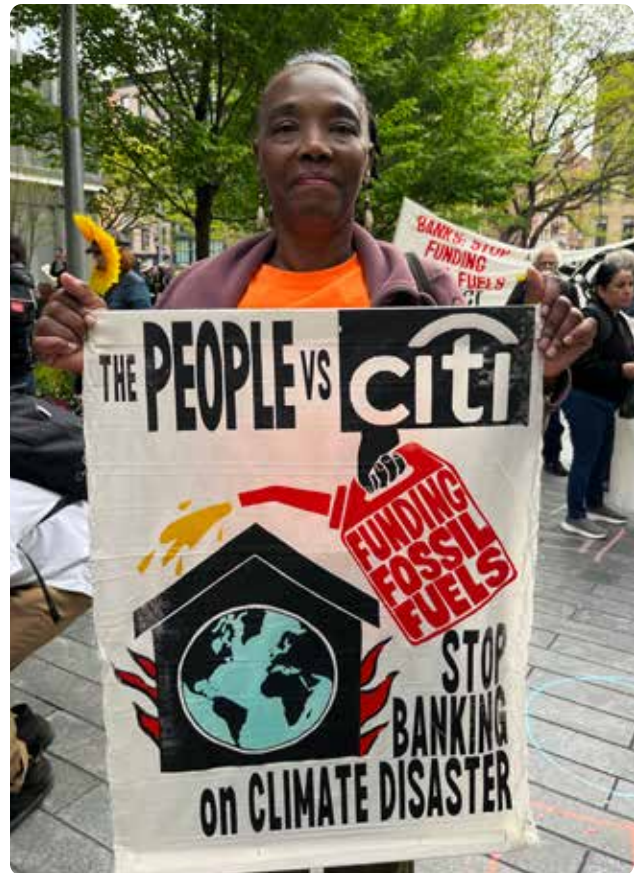
Citi claims to be advancing solutions to the climate crisis<sup>1</sup> and the racial wealth gap.<sup>2</sup> However, it is one of the biggest fossil fuel funders in the world; financing projects and companies in communities of color that cause dangerous impacts both for the people living nearby and beyond. This contrast reveals Citi’s profound hypocrisy and complicity in environmental racism, undermining the bank’s claims that it is addressing the climate crisis and the racial wealth gap.

This report looks at the effects of Citi’s fossil fuel financing on communities in the U.S. Gulf South. It provides a qualitative and quantitative snapshot of the harms fossil fuel facilities have on the health and well-being of predominantly communities of color in the Gulf South states of Texas and Louisiana. It makes the case that by funding polluting projects and the companies behind them in predominantly low-income and BIPOC communities, Citi is perpetuating environmental racism.

This report focuses on a limited number of fossil fuel facilities and companies in the U.S. Gulf South in order to provide in-depth examples of the harms to community health and our climate that are associated with Citi’s financing. Though they are not analyzed in this report, similar impacts are replicated by Citi’s financing of fossil fuels in many communities around the world.

The dataset showcased here estimates the real-world impacts related to Citi’s funding of LNG terminals that are operating and under construction in low-income and communities of color in Texas and Louisiana; specifically Cameron LNG, Corpus Christi LNG, Port Arthur LNG, and Sabine Pass LNG. This analysis used data from the report *Permit To Kill*<sup>3</sup>, which quantifies health impacts related to the air pollution that is produced, or which will be produced, by these LNG projects. Our dataset associates these impacts with Citi based on its proportion of overall bank funding. The data further shows the greenhouse gas (GHG) emissions associated with Citi’s funding of these four LNG terminals, as well as Enbridge, which is applying for permits to build the Rio Bravo Pipeline<sup>4</sup> through the lands of the Carrizo Comecrudo

Tribe of South Texas.<sup>5</sup> The report also looks at the impacts related to Formosa Plastics Group (Formosa Plastics), which is pursuing permits to construct a massive petrochemical facility in a historically Black community in Louisiana.<sup>6</sup> Formosa Plastics’ plans are a clear case of environmental racism, and local advocates are urging Citi to refrain from financing the so-called “Sunshine Project.”



ADVOCATE CALLS ON CITI TO STOP FUNDING FOSSIL FUELS AT AN ACTION OUTSIDE THE BANK’S HEADQUARTERS. APRIL 24, 2023. PHOTO: JUDITH CROSBIE.

## EXECUTIVE SUMMARY

This analysis estimates that Citi has provided at least **\$1.6 billion in direct financing for four LNG export terminals** in the Gulf South (at Sabine Pass, Cameron, Corpus Christi and Port Arthur). Through its proportion of overall financing, Citi could be attributed at a maximum for the following **annual estimated impacts**:

**2.3**

premature deaths

**10**

cases of childhood asthma onset

**\$36M**

million USD in health costs

**1654**

instances of asthma symptoms

**864**

lost school days

**65**

lost work days

**22 MMT**

of CO<sub>2</sub>e emissions per year

## CITI'S FINANCED EMISSIONS FOR GULF LNG TERMINALS ARE EQUIVALENT TO:

The annual pollution produced by **6.6 coal power plants**.



The pollution produced by **6 million gasoline-powered cars over the course of a year**.



## EXECUTIVE SUMMARY

**If all of these facilities are constructed, over the course of an LNG terminal's lifespan of up to 35 years,<sup>7</sup> Citi could be responsible for as many as 80.5 premature deaths related to the air pollution from these projects.**

Additionally, Citi has provided over \$9 billion in financing for Enbridge from 2016 to 2023,<sup>8</sup> and financed \$668 million for Formosa Plastics from 2001 to 2015.<sup>9</sup> Citi's corporate-level financing for Enbridge is associated with 50 MMT CO<sub>2</sub>e/yr; equivalent to the emissions produced by over 12 million gas-powered cars in a year. Formosa Plastics' 2022 emissions are reported by the company as 47.29 million tons, similar to the annual emissions from 11 million gas-powered cars or 12.2 coal plants operating for a year. The combined estimated health impacts related to air pollution projected for the Rio Bravo Pipeline's Compressor Station and the Sunshine Project include 13 deaths and \$203 million in health costs per year.

The report also features case studies from three of the communities impacted by Citi's fossil fuel financing: Port Arthur, Texas; the Rio Grande Valley, Texas; and St. James Parish, Louisiana. Through interviews with members of each community, the case studies highlight the human cost of living near polluting facilities and present clear cases of environmental injustice. These case studies also illustrate the courage of community leaders who stand up to corporations and their financial backers, demand accountability from politicians, and seek change for their neighbors and families.

**The remedy to this harm is simple: Citi must end its financing for polluting fossil fuel projects that are contributing to environmental injustices, and redirect these funds towards sustainable and equitable development for the Gulf Coast and beyond. Only then can Citi live up to its commitment to advancing racial and climate justice.**



OIL STORAGE TANKS LOOM IN THE BACKDROP OF A CEMETERY IN ST. JAMES, LOUISIANA. JANUARY 17, 2024.



# Background

ACTIVISTS BLOCK THE DOORS OF CITI'S NEW YORK HEADQUARTERS TO PROTEST THE BANK'S FOSSIL FUEL FINANCING. SEPTEMBER 9, 2023. PHOTO: KEN SCHLES.



# What is Environmental Racism? A Gulf Coast Perspective

The clustering of oil refineries, LNG terminals and petrochemical facilities across the U.S. near Black, Indigenous, low-income and communities of color is not accidental. Their location is a result of strategic decisions made by industry and rubber-stamped by regulators to build such facilities near low-income communities of color, where environmental protection is inadequate and heavy industry is already concentrated.<sup>10</sup> Research shows that people of color in the U.S. are exposed to 38 percent more nitrogen dioxide, an air pollutant emitted by power plants, than white people,<sup>11</sup> and are 75 percent more likely to live close to polluting industries than the average American.<sup>12</sup>

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These communities, known as fenceline communities, are disproportionately affected by industrial pollution, leading to higher rates of cancer, respiratory issues, and other health problems.<sup>13</sup> The Gulf Coast, including Texas and Louisiana, has some of the highest concentrations of industrial facilities—and cancer rates—in the entire country.<sup>14</sup>

Decades of systematic marginalization perpetrated against low-income, Black, Indigenous, and communities of color in the Gulf Coast has allowed for the present-day high concentrations of industrial facilities crowding their neighborhoods.<sup>15</sup>

The term for this practice is environmental racism. Dr. Robert Bullard, widely considered the “Father of Environmental Justice,” defines environmental

racism as “any policy, practice or directive that differentially affects or disadvantages (where intended or unintended) individuals, groups or communities based on race.” He defines environmental justice as a notion that “embraces the principle that all people and communities have a right to equal protection and equal enforcement of environmental laws and regulations.”

Environmental racism is “any policy, practice or directive that differentially affects or disadvantages (where intended or unintended) individuals, groups or communities based on race.”



### What is a “Sacrifice Zone”?

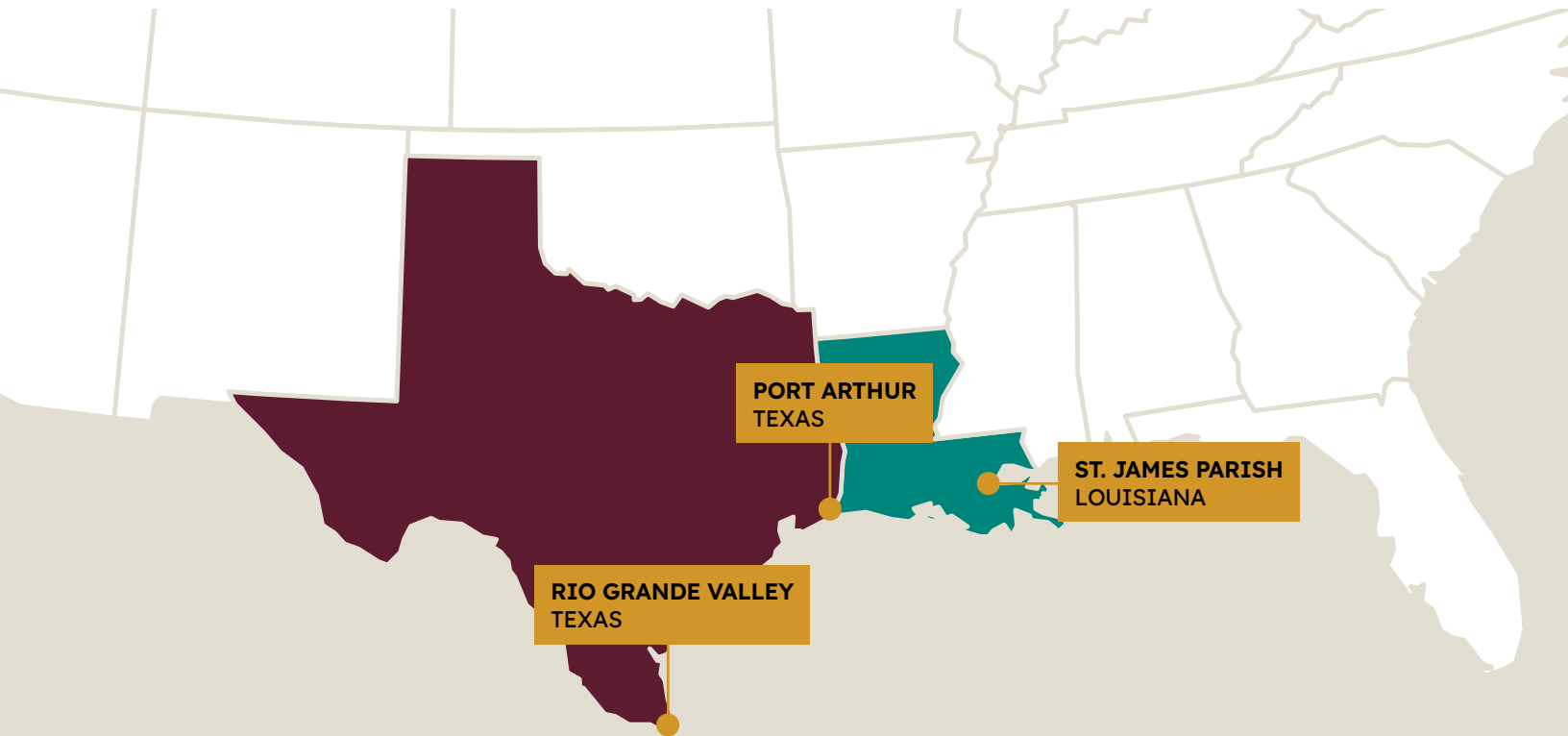
The regions highlighted in this report are often called “sacrifice zones.” Sacrifice zones are subjected to high levels of pollution, environmental damage, and health risks, bearing the brunt of industrial activities, such as chemical or fuel production and hazardous waste disposal. Sacrifice zones are typically located in low-income communities and communities of color, where residents historically have less political power to resist the placement of hazardous facilities. Sacrifice zones are a prominent manifestation of environmental racism. In an essay titled “Racism is Killing the Planet,” environmental advocate Hop Hopkins states, “You can’t have climate change without sacrifice zones, and you can’t have sacrifice zones without disposable people, and you can’t have disposable people without racism.”<sup>16</sup>



A COMMUNITY MEMBER FISHES IN THE SHADOW OF THE GOLDEN PASS LNG FACILITY IN PORT ARTHUR, TEXAS.  
PHOTO: DAYNA REGGERO

# The Gulf Speaks: Three Communities on the Frontlines of Environmental Justice

This report highlights three communities fighting for environmental justice along the Texas and Louisiana Gulf Coast who are experiencing the cost of living near a fossil fuel facility that Citi has directly or indirectly supported.



## 📍 Port Arthur, Texas

Port Arthur is a diverse community in Southeast Texas. Eighty-two percent of Port Arthur is people of color, and half of the population is low-income.<sup>17</sup> The small city also hosts one of the largest oil refinery complexes in the U.S.<sup>18</sup> A study by the University of Texas Medical Branch found higher incidences of respiratory conditions, nervous system disorders, skin disorders, and headaches among residents living near these refineries compared to those farther away.<sup>19</sup>

Testimonies are shared from two Port Arthur community leaders, John Beard Jr. and Reginald Trainer, both members of the [Port Arthur Community Action Network \(PACAN\)](#). Beard and Trainer are working to stop the construction of Sempra's Port Arthur LNG export terminal.

### 📍 Rio Grande Valley, Texas

The predominantly Latine Rio Grande Valley faces significant health disparities due to limited access to health care and low income levels. Proposed fossil fuel developments in the region, such as the Rio Bravo Pipeline, would only exacerbate these issues. Reports already show higher rates of asthma among children in the region due to hazardous air pollutants.<sup>20</sup> The [Carrizo Comecrudo Tribe of Texas](#) has raised concerns about the threat of adverse effects on their ancestral lands and community health due to these projects.

Interviews are included with two members of the Carrizo Comecrudo Tribe, Chairman Juan Mancias and Dr. Christopher Basaldú, who are leading the effort in South Texas and beyond to stop the LNG export buildout, including the Rio Bravo Pipeline in the Rio Grande Valley.

### 📍 St. James Parish, Louisiana

St. James Parish is home to historically Black communities and is in the heart of “Cancer Alley,” an 85-mile stretch along the Mississippi River with around 200 chemical plants and refineries.<sup>21</sup> A study found that estimated cancer risk from industrial air pollutants is higher in Cancer Alley than the rest of Louisiana.<sup>22</sup> St. John the Baptist Parish, also located in Cancer Alley, has a cancer risk nearly seven times the national average, with the highest risks in predominantly Black communities.<sup>23</sup>

The story of local leader Shamell Lavigne, one of the founding members of advocacy organization [RISE St. James](#), is highlighted. Lavigne is mobilizing her community and allies to help stop the construction of Formosa Plastics Group’s FG LA Complex. Commonly called the “Sunshine Project,” it would be North America’s largest plastics manufacturing site if built.<sup>24</sup>



GULF COAST RESIDENTS AND ALLIES MARCH AGAINST LNG EXPANSION OUTSIDE AN OIL AND GAS CONFERENCE IN NEW ORLEANS, LOUISIANA JANUARY 19, 2024.

## Gulf Communities Speak Out

While this report focuses on just three Gulf South case studies related to Citi's financing, there are many more communities in the region resisting fossil fuel and petrochemical expansion in their backyards whose stories are not included here. When the following leaders from other Gulf communities were asked to share their message for Citi, here's what they said:

### Manning Rollerson from Freeport Haven

"We are still recovering from the destruction of Hurricane Beryl. Every window in our home shattered before going a week without power during a heatwave, and **this is the future that banks like Citi have created by continuing to finance fossil fuel projects while the climate crisis is already here.** All of this Wall Street money and investment coming into our town and who has it helped? Not the people of Freeport. Our infrastructure is crumbling, downtown is in shutters, and we have high rates of poverty. These companies make billions while our community deals with the consequences. We're breathing in chemicals causing high rates of cancer, but they seem to think it's not a problem if it happens in an area like ours: low income and majority people of color. If banks like Citi continue financing this attack on our communities, **they are complicit in environmental racism and fueling climate chaos!**"



PHOTO: ALYSCE ZULEGER

### James Hiatt from For a Better Bayou



"We got to stop funding these dirty projects. Enough is enough. The Gulf is not a sacrifice zone. We've seen so many storms, we've seen the public health impacts. **People getting sick, people can't breathe, people getting cancer, all being funded by Citibank and other financiers.** Fossil fuels are not the future. They are what has caused so much environmental injustice. Enough is enough."

PHOTO: DIEGO HENRIQUEZ / TRAVERSE PRODUCTIONS

### Lois Malvo from Fisherville Environmental Action Now

"**It is time for Citibank to stop funding these corporations for expanding fossil fuels and destroying us.** They need to stop. It's just not right. And it just shows how Citibank don't care nothing about us."



PHOTO: LUIS YANEZ

### Debra Ramirez from Mossville Environmental Action Now:



"**The banks that are involved in financing these big oil and gas industries really need to stop,** because they're not understanding how it has harmed communities. I'm angry as I can be about it because they never stopped to think that profit is not as important as people."

PHOTO: LUIS YANEZ

# Citi's Record of Climate & Racial Injustice

## A Top Funder of Polluting Industries

Financial institutions, such as banks, insurers, and asset managers, are fueling the climate crisis and exacerbating environmental injustices by funding, underwriting, and investing in fossil fuels. Banks act as a crucial enabler in the pollution economy; providing access to capital that allows fossil fuel companies to build and maintain destructive oil, gas and coal operations. Each stage of the fossil fuel life cycle disproportionately harms Black, brown, Indigenous and low-income communities through air and water pollution, ecosystem degradation, economic and climate impacts, among others.<sup>25</sup> The major banks financing coal, oil and gas companies are complicit in this fossil fuel racism.

Citi has played an outsized role in funding fossil fuels. It is the second biggest funder of oil, gas and coal in the world since 2016 when countries adopted the Paris Agreement to limit global warming.<sup>26</sup> It is also the world's largest funder of the companies building new and expanding fossil fuel projects since 2016, according to the Banking on Climate Chaos report. During this period, Citi has given loans and underwritten bonds for these companies totalling \$204 billion.<sup>27</sup>

While Citi has professed a commitment to addressing climate change,<sup>28</sup> its actions reveal a greater loyalty to its fossil fuel clients. Citi's pledge to reach net zero emissions by 2050<sup>29</sup> is undermined by its continued financing of new fossil fuel infrastructure, contradicting the global consensus that net zero alignment is incompatible with new fossil fuel investments.<sup>30</sup> While the bank has taken steps to disclose its client progress on transitioning out of carbon-intensive practices, the vast majority of its clients still lack a credible transition plan.<sup>31</sup> Additionally, Citi recently updated its policy to end project-related financing for oil and gas expansion in the Amazon,<sup>32</sup> but this policy would cover a mere 18 percent of their financing to the region and would still allow for funding major companies exploiting the Amazon such as Petroperú and Petroecuador, which have a record of oil spills and Indigenous rights violations.<sup>33</sup> Meanwhile, Citi has also backpedaled on its climate initiatives, such as its recent departure

from the Equator Principles,<sup>34</sup> and CEO Jane Fraser's emphasis on "energy security,"<sup>35</sup> a euphemism for continued fossil fuel reliance.

Notably, Citi is the top funder of LNG expansion globally, pouring over \$55 billion into the sector since 2016.<sup>36</sup> This includes the bank's funding for projects and the companies building new LNG facilities in the U.S. Gulf South, which are disproportionately sited in Black, Indigenous and other communities of color.<sup>37</sup> The bank also facilitated \$145 billion in financing for global plastics companies from 2015 to 2020,<sup>38</sup> and is among the top five banks financing the petrochemical industry in the U.S. Gulf South.<sup>39</sup> This financing enables facilities that significantly harm the environment and the surrounding communities' health, as illustrated in this report.

## A History of Racial Injustice

Citi's history of enabling racism in the U.S. and globally goes back to its origins. The bank's predecessors built significant wealth from slavery and exploitation,<sup>40</sup> and then continued to profit from racial inequality up to today, as the subsequent examples will illustrate. Following the racial justice uprisings in 2020, Citibank announced a \$1 billion "Action for Racial Equity" commitment to help close the racial wealth gap, including goals to expand banking and credit access to communities of color, invest in affordable housing, and "become an anti-racist institution."<sup>41</sup> However, from its inception to the present day, Citi has harmed communities of color in the pursuit of its own financial gain, as shown in the following timeline.



CLIMATE ADVOCATES HOLD A BANNER OUTSIDE OF CITI'S NEW YORK HEADQUARTERS. PHOTO: ADRIAN CHILDRESS

## Timeline: Profiting from Racism Past and Present

### 1855—1882

Moses Taylor acted as the president of City Bank of New York (Citi's original name) from 1855 until his death in 1882. Taylor made his fortune through his sugar trading empire, driven by enslaved labor on Cuban sugar plantations.<sup>42</sup>



### 1914

National City Bank, another Citi predecessor, convinced the United States government to step in and seize control of newly independent Haiti's finances,<sup>43</sup> leading to a violent 19-year military occupation and the literal looting of Haiti's national bank. Citi profited enormously from this takeover: while Haiti spent five times more repaying its debts than it did on government-run schools, one of the country's debts held by National City Bank was among the bank's most profitable in the 1920's.<sup>44</sup>

### 1987

Citi vocally opposed divestment from apartheid South Africa in the 1980's, citing "moral grounds" for staying in the country.<sup>45</sup> Citi became the only remaining American bank in the country until 1987, when it finally withdrew for "business reasons."<sup>46</sup>

PHOTO SOURCE: THE GLOBAL AND MAIL, ARCHIVES OF ONTARIO.



### 2008

In the leadup to the 2008 mass foreclosure crisis, Citi restricted credit in minority neighborhoods while targeting minorities for high-cost loans that ended in default, sparking several lawsuits over its role in the financial crisis.<sup>47</sup>

### 2019

Citi was fined \$25 million for violating the Fair Housing Act by unequally offering mortgage discounts to customers based on "race, color, national origin, or sex."<sup>48</sup>



### 2020-2021

Citi reduced home purchase loans to Black and Latine households by an average of 35 percent between 2020 and 2022,<sup>49</sup> despite promising to expand banking and credit access to communities of color.<sup>50</sup>

### 2022

Banking trade associations that Citi is a member of sued the Consumer Financial Protection Bureau for policies to combat racial discrimination in the financial sector.<sup>51</sup> The trade groups include the Chamber of Commerce, the American Bankers Association, and the Consumer Bankers Association.



## Citi’s Risky Relationship with Fossil Fuels

Citi incurs significant financial risk by continually backing oil, gas and coal projects. The bank has acknowledged these risks, as well as the opportunity for the bank to take on leadership in the transition, yet it continues to pour billions into fossil fuel companies.

In its commitment to achieving net zero greenhouse gas emissions by 2050, Citi recognizes that the transition to a net zero economy will require significant changes.<sup>52</sup> As stated by Citi’s CEO, Jane Fraser, “We believe that global financial institutions like Citi have the opportunity—and the responsibility—to play a leading role in helping drive the transition to a net zero global economy and make good on the promise of the Paris Agreement.”<sup>53</sup>

As the world transitions to clean energy, if Citi fails to address its massive fossil fuel exposure, the bank could face \$10.3 billion in losses over 10 years, according to disclosures the bank made to the Federal Reserve revealed in 2024.<sup>54</sup> This is because of Citi’s significant lending to oil and gas companies, whose fossil fuel infrastructure could become stranded assets as the world shifts to renewable energy sources.<sup>55</sup> This risk is exemplified in recent developments around LNG and petrochemical facilities in the U.S.<sup>56</sup>

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### Nothing “Natural” About LNG

Liquefied “natural” gas (LNG), is primarily methane gas, cooled into a liquid that takes up 600 times less space than as a gas, and is shipped via tankers across our oceans.<sup>57</sup> At its destination, it is turned back into a gas and used, primarily for heating and electricity generation.<sup>58</sup>

In less than a decade, fracking enabled the United States to become the largest producer of gas in the world.<sup>59</sup> This boom has led to an exponential increase in pipeline networks and export terminals to transport the gas and ship it abroad, particularly in U.S. Gulf Coast states such as Texas and Louisiana. Six new or expanded LNG terminals are under construction in the U.S., and another 26 new terminals or expansion projects are planned, primarily in the Gulf South.<sup>60</sup> Meanwhile, more than 20 billion cubic feet per day of natural gas pipeline capacity is under construction or in development in the U.S. as of 2023,<sup>61</sup> which would transport the emissions equivalent to over 1 million pounds of coal burned every day.<sup>62</sup> The frenzy to expand LNG supplies was further fueled by Russia’s invasion of Ukraine, leading Europe and Asia to seek out alternate sources of gas that an all-too-willing U.S. market has been happy to provide.<sup>63</sup> In 2023, U.S. gas accounted for 48 percent of European gas imports, relative to only 27 percent in 2021.<sup>64</sup>

**Six new or expanded LNG terminals are under construction in the U.S., and another 26 new terminals or expansion projects are planned, primarily in the Gulf South.**

However, LNG facilities wreak havoc on the climate and in communities, particularly communities of color, where the gas is extracted, transported, and burned. LNG terminals release harmful pollutants, such as volatile organic compounds (VOCs), nitrogen oxides (NOx), sulfur dioxide (SO<sub>2</sub>), carbon monoxide (CO) and particulate matter (PM).<sup>65</sup> These pollutants can damage the lungs, trigger asthma and heart attacks, and inhibit oxygen intake to the heart and brain, among other health harms.<sup>66</sup> Methane itself is linked to a multitude of human health harms, including cancer, respiratory illnesses, and cardiovascular diseases.<sup>67</sup>





THE LNG TANKER STENA CRYSTAL SKY AT THE CHENIERE LNG FACILITY IN SABINE PASS, TEXAS. APRIL 23, 2023.

**LNG terminals release harmful pollutants that can damage the lungs, trigger asthma and heart attacks, and inhibit oxygen intake to the heart and brain, among other health harms.**

Methane is also a potent greenhouse gas, responsible for 45 percent of global heating since the industrial revolution.<sup>68</sup> This worsens the climate emergency globally, and especially in coastal Gulf communities that experience ever more devastating hurricanes, sea level rise, flooding, and other disasters. Climate-induced storms in turn can unleash additional toxic spills and pollutant releases from oil, gas, and petrochemical facilities on nearby communities.<sup>69</sup>

Texas regulators have largely neglected to reduce illegal air pollution, imposing fines in less than 3 percent of cases.<sup>70</sup> In the case of Corpus Christi LNG, one of the terminals profiled in this report and the largest U.S. exporter of LNG, the Texas Commission on Environmental Quality has repeatedly increased pollution limits for the plant. As of 2022, the facility was permitted to release 353 tons per year of VOCs,

twice the limit set out in its original permit in 2014.<sup>71</sup> VOCs (volatile organic compounds) include a variety of chemicals, some linked to adverse health effects.<sup>72</sup> The state has raised limits on four other pollutants for Corpus Christi LNG by more than 40 percent.<sup>73</sup>

In January 2024, after years of pressure from frontline communities and their allies, the Biden administration announced a temporary pause on new LNG export license approvals.<sup>74</sup> This pause affected multiple LNG export terminals in the region, including the Port Arthur LNG Expansion, Calcasieu Pass 2 LNG, and Lake Charles LNG.<sup>75</sup> This was a significant victory for local residents, putting the brakes on the development of new methane facilities that would worsen the already polluted air in these communities. While federal courts recently blocked the export pause, the move still casts uncertainty on the future of new LNG developments.<sup>76</sup> The Department of Energy is not required to approve new export applications while they study the economic and environmental impacts of these projects.<sup>77</sup> Roishetta Ozane, founder and director of The Vessel Project of Louisiana, emphasized that the pause “sets the stage for potential rejections and slows down the progress of these projects, making it much harder for them to secure financing.”<sup>78</sup>

## BACKGROUND

Additionally, investors are increasingly concerned about the long-term viability of LNG projects amid rising calls globally to phase out fossil fuels. A recent analysis from the Institute for Energy Economics and Financial Analysis shows a looming oversupply within two years, all adding to the potential of new facilities quickly becoming stranded assets.<sup>79</sup> Regardless of the economics, if more LNG facilities are built, local communities stand to bear the impacts of increased pollution and climate destabilization for decades to come.

**Investors and stakeholders are increasingly concerned about the long-term viability of LNG projects amid rising calls globally to phase out fossil fuels. A recent analysis from the Institute for Energy Economics and Financial Analysis shows a looming oversupply within two years, all adding to the potential of new facilities quickly becoming stranded assets.**

### **Petrochemicals: Fossil Fuels' New Frontier**

As the world transitions towards renewable energy, the fossil fuel industry is increasingly turning to a new lifeline in an attempt to maintain profitability: petrochemicals. This sector is primarily composed of plastics and fertilizers, though it includes a range of other fossil-fuel-derived products.<sup>80</sup> Petrochemical producers have massive expansion plans in the U.S., with 120 new or expanded facilities proposed, mainly in the U.S. Gulf South as well as the Ohio River Valley.<sup>81</sup> The \$12 billion petrochemical complex that Taiwanese company Formosa Plastics is developing in Louisiana is just one example of these plans.<sup>82</sup>

Without intervention, plastic production could double or triple by 2050.<sup>83</sup> Oil majors like Exxon are betting on petrochemicals as a way to continue profiting from oil and gas.<sup>84</sup> However, as consumer attitudes and legislation increasingly shift against single-use plastics, the material risk increases for financiers like Citi that are heavily invested in and exposed to the petrochemical industry, including plastics.<sup>85</sup>



# Research Findings

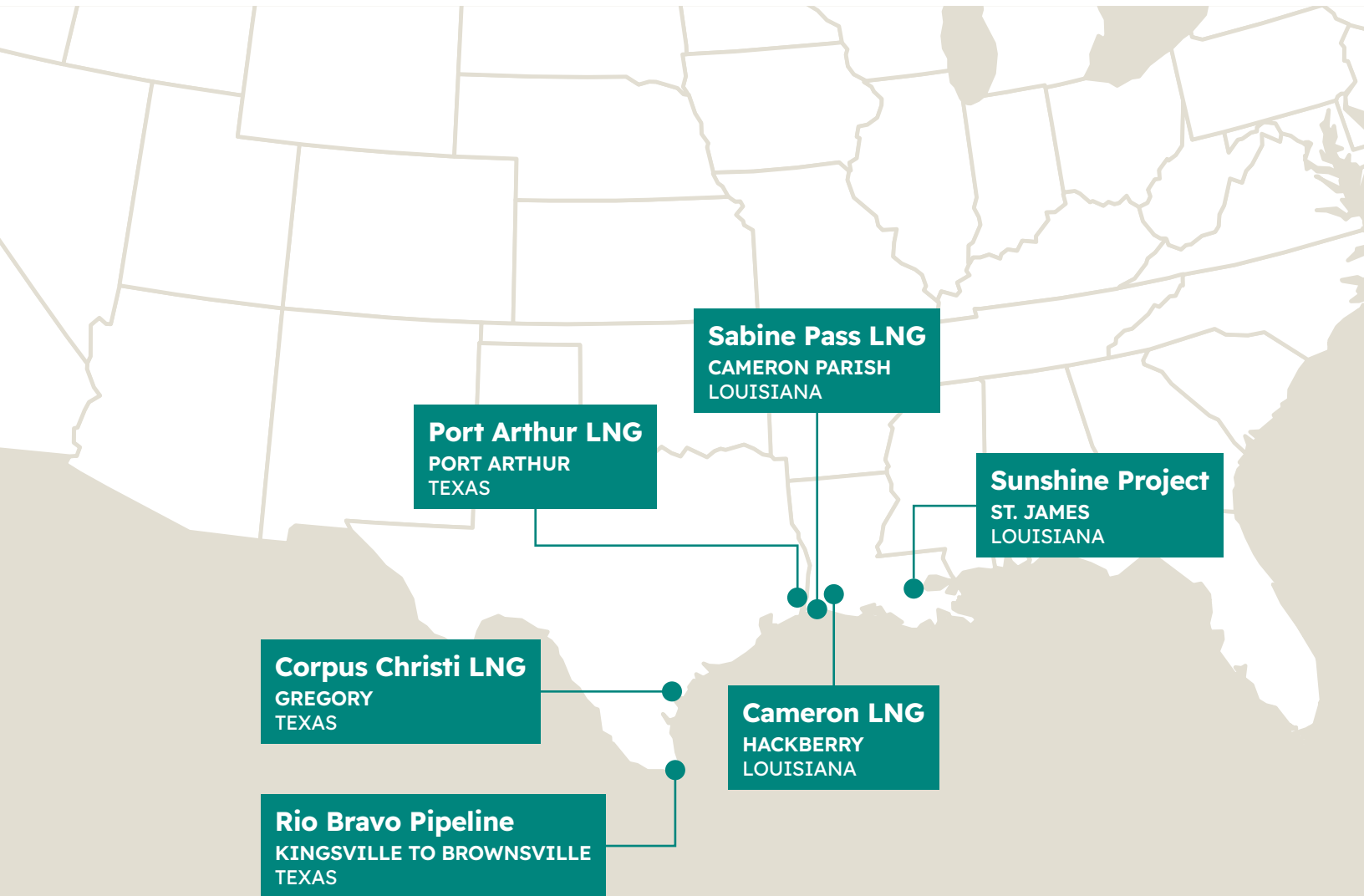
PHOTO TOP: THE CONSTRUCTION SITE FOR SEMBRA'S LNG EXPORT TERMINAL IN PORT ARTHUR, TEXAS. JUNE 12, 2023.  
PHOTO: © HEALTHY GULF, COURTESY SOUTHWINGS

## RESEARCH FINDINGS

The research conducted for this report uses Citi's financing for several fossil fuel projects, as well as companies developing new projects, in the U.S. Gulf South to estimate Citi's responsibility for their projected climate and health impacts.

Citi has committed an estimated \$1.63 billion in direct financing for LNG export terminals in the Gulf South, analysis using the Banking on Climate Chaos database finds.<sup>86</sup> From 2016 to 2023, the bank has enabled \$9.2 billion in financing for Enbridge,<sup>87</sup> which is applying for permits to develop the Rio Bravo Pipeline in Texas.<sup>88</sup> In fact, Enbridge was one

of Citi's top fossil fuel clients in 2023, committing over \$2 billion in funding to the company last year.<sup>89</sup> Meanwhile, Citi financed \$668 million for Formosa Plastics from 2001 to 2015.<sup>90</sup> Formosa Plastics' proposed Sunshine Project is included as advocates and community leaders are urging Citi not to finance the project or any petrochemical companies.



## RESEARCH FINDINGS

TABLE 1: PROJECTS AND COMPANIES ANALYZED

PROJECT	MAJORITY OWNER	COUNTY / PARISH	STATUS
Cameron LNG Phase I	Sempra	Cameron, LA	Operating
Corpus Christi LNG Stage I	Cheniere Energy	San Patricio, TX	Operating
Corpus Christi LNG Stage II	Cheniere Energy	San Patricio, TX	Under Construction
Port Arthur LNG	Sempra	Jefferson, TX	Under construction
Sabine Pass LNG Phase I	Cheniere Energy	Cameron, LA	Operating
Sabine Pass LNG Phase II	Cheniere Energy	Cameron, LA	Operating
Rio Bravo Pipeline	Enbridge	Kleberg, Kenedy, Willacy, Cameron, TX	Planned
Sunshine Project	Formosa Plastics Group	St. James, LA	Planned

TABLE 2: CITI'S FINANCING FOR LNG EXPORT TERMINALS IN THE U.S. GULF SOUTH<sup>91</sup>

PROJECT	COMPANY	CITI FINANCING 2016-2023 (MILLION USD)	ALL BANK FINANCING 2016-2023 (MILLION USD)	CITI'S % OF TOTAL PROJECT FINANCING
Cameron LNG	Cameron LNG LLC	\$604.00	\$5,765.60	10.50%
Corpus Christi LNG	Cheniere Corpus Christi Holdings LLC	\$425.10	\$13,505.40	3.10%
Port Arthur LNG	Port Arthur LNG LLC	\$371.90	\$6,251.90	5.90%
Sabine Pass LNG	Sabine Pass Liquefaction LLC	\$226.10	\$8,444.50	2.70%
<b>TOTAL</b>		<b>\$1,627.10</b>	<b>\$33,967.40</b>	

TABLE 3: CITI CORPORATE FINANCING FOR ENBRIDGE<sup>92</sup> AND FORMOSA PLASTICS GROUP<sup>93</sup>

COMPANY	CITI CORPORATE FINANCING (MILLION USD)	TOTAL CORPORATE FINANCING (MILLION USD)	CITI'S % OF TOTAL FINANCING
Enbridge	\$9,178.70	\$159,274.40	5.80%
Formosa Plastics Group	\$668.00	\$40,020.00	1.70%

## RESEARCH FINDINGS

Health impacts from exposure to fine particulate matter (PM<sub>2.5</sub>) and ozone air pollution are estimated using the Environmental Protection Agency's Co-Benefits Risk Assessment Health Impacts Screening and Mapping Tool (COBRA),<sup>94</sup> based on the permitted levels of criteria air pollution for the four export terminals in scope. COBRA estimates health impacts across all counties in the contiguous 48 states of the U.S., given that air pollutants are dispersed beyond the county where they originate. Throughout the report, the high end estimates of total mortality and health cost ranges are used. The methodology used is further detailed in Appendix 2.

The outcomes reported here include premature deaths, childhood asthma onset, reported episodes of asthma symptoms, school and work absences due to illness, and the costs incurred from treating illnesses related to increased air pollution. The estimated health costs and absences from school or work due to illness are important indicators of the holistic impacts of the LNG terminals. The pollution from these facilities can lead to illness and even death, which in turn can lead to missed learning opportunities and income, and the added cost burden of treating illnesses.<sup>95</sup> These estimated outcomes show how living near polluting facilities can compound the health, economic, and education disadvantages already faced by these communities.

## LNG Export Terminals

The analysis estimates the greenhouse gas emissions and health impacts associated with Citi's financing for the four LNG export terminals that it has directly funded in the Gulf South. The projected impacts and emissions for Corpus Christi LNG Stage II and Port Arthur LNG, which are currently under construction, are included. Estimates from the recent Permit To Kill report are used and represent single-year health impacts projected using permitted levels of air pollutants as if each LNG project were operating in 2023.<sup>96</sup> The estimated health outcomes are then attributed to Citi using the bank's proportion of overall financing for each project, similar to a financed emissions methodology.

The results are alarming. The four terminals funded by Citi could cause as many as 52 premature mortalities per year, 267 asthma cases, \$827 million in annual health costs, and up to 23,049 lost school or work days.<sup>97</sup> Citi's funding for four LNG export terminals is



THE CAMERON LNG FACILITY FLARING, WHERE METHANE GAS IS BURNED AND POLLUTANTS ARE RELEASED. SEPTEMBER 6, 2020. PHOTO: © HEALTHY GULF, COURTESY SOUTHWINGS

associated with up to 2.3 deaths, 10 new asthma cases and 1,654 instances of asthma symptoms, 929 lost school and work days and \$36 million in health costs for every year that these terminals are operating, as illustrated in Table 4.

LNG terminals have an expected operational life of 25-35 years, although several facilities have been operational for over 40 years.<sup>98</sup> Assuming the estimated health impacts stay constant, the bank could be responsible for 57.5-80.5 deaths related to the LNG terminals in the U.S. Gulf South it has financed.<sup>99</sup>

**Citi could be responsible for 57.5-80.5 deaths related to the LNG terminals in the U.S. Gulf South it has financed so far over the course of an LNG terminal's lifespan.**

Each of these terminals are planning additional expansion phases (i.e. Cameron LNG Phase II,<sup>100</sup> Corpus Christi LNG Midscale 8-9,<sup>101</sup> Port Arthur LNG Expansion,<sup>102</sup> and Sabine Pass LNG Stage V<sup>103</sup>), which would multiply the already devastating harms to communities' health. These expansion phases were not included in the analysis, as the Sierra Club LNG Export Tracker does not indicate that Citi has directly financed them.<sup>104</sup> However, since Citi has funded initial phases of these projects, it is likely that the bank will fund proposed expansion phases. In some cases, Citi's previous financing could also be used by developers to enable their expansion plans.

## RESEARCH FINDINGS

TABLE 4: ANNUAL HEALTH IMPACTS RELATED TO FOUR LNG EXPORT TERMINALS FINANCED BY CITI AND IMPACTS ATTRIBUTABLE TO CITI BASED ON ITS PROPORTION OF PROJECT FINANCING

PROJECT	MORTALITY (HIGH ESTIMATE)	HEALTH COSTS (MLN USD, HIGH ESTIMATE)	ASTHMA ONSET	ASTHMA SYMPTOMS	LOST WORK DAYS	LOST SCHOOL DAYS
<b>CAMERON LNG PHASE I</b>						
Total Project Impacts	8	\$124.2	32	5,006	245	2,495
Impacts Attributable to Citi	0.83	\$13.0	3.4	526	26	262
<b>CORPUS CHRISTI LNG STAGES I AND II (STAGE II UNDER CONSTRUCTION)</b>						
Total Project Impacts	12	\$203.6	82	12,401	269	7,024
Impacts Attributable to Citi	0.38	\$6.3	2.5	384	8	218
<b>PORT ARTHUR LNG (UNDER CONSTRUCTION)</b>						
Total Project Impacts	7	\$113.4	25	3,950	311	1,678
Impacts Attributable to Citi	0.43	\$6.7	1.5	233	18	99
<b>SABINE PASS LNG PHASE I AND II</b>						
Total Project Impacts	24	\$385.5	123	18,930	479	10,548
Impacts Attributable to Citi	0.65	\$10.40	3.3	511	13	285
<b>TOTAL HEALTH IMPACTS</b>	<b>52</b>	<b>\$826.70</b>	<b>261</b>	<b>40,286</b>	<b>1,304</b>	<b>21,745</b>
<b>TOTAL CITI ATTRIBUTION</b>	<b>2.3</b>	<b>\$36.50</b>	<b>10.7</b>	<b>1,654</b>	<b>65</b>	<b>864</b>

Regarding the climate impact, the lifecycle GHG emissions related to the LNG terminals that Citi has financed so far is 571 MMT CO<sub>2</sub>e/yr.<sup>105</sup> Citi is responsible for 26 MMT CO<sub>2</sub>e/yr related to its financing for these four terminals (see Table 5). This is equivalent to the annual emissions produced by 6.6 coal plants or 6,189,450 gasoline-powered cars on the road.<sup>106</sup>

**Citi's financed emissions for LNG terminals in the Gulf South are equivalent to the annual emissions produced by 6.6 coal plants or 6,189,450 gasoline-powered cars on the road.**



## RESEARCH FINDINGS

TABLE 5: CITI’S ANNUAL GREENHOUSE GAS EMISSIONS RELATED TO FINANCING FOR OPERATING AND UNDER CONSTRUCTION LNG PROJECTS IN THE U.S. GULF SOUTH

PROJECT	ANNUAL LIFECYCLE EMISSIONS (MMT CO <sub>2</sub> E/YR)	CITI’S FINANCED EMISSIONS (MMT CO <sub>2</sub> E/YR)	CITI FINANCED EMISSIONS EQUIVALENT: COAL PLANTS	CITI FINANCED EMISSIONS EQUIVALENT: GASOLINE-POWERED CARS
Cameron LNG Phase I	92	9.7	2.5	2,293,030
Corpus Christi LNG Stages I and II (Stage II under construction)	178	5.5	1.4	1,331,027
Port Arthur LNG (under construction)	83	4.9	1.2	1,175,744
Sabine Pass LNG Phases I and II	218	5.9	1.5	1,389,650
<b>TOTAL</b>	<b>571</b>	<b>26</b>	<b>6.6</b>	<b>6,189,450</b>

These findings are compounded by the fact that most of these projects are located in communities that are disproportionately low income and people of color, as revealed by analysis conducted of demographic information within a 10 mile radius of each LNG terminal using the EPA’s Environmental Justice Screening and Mapping Tool (EJScreen) as illustrated in Table 6. The area near Sabine Pass LNG is 93 percent people of color,<sup>107</sup> while just across the water, the region around Port Arthur LNG is 76 percent people of color.<sup>108</sup>

Sixty percent of households around Sabine Pass LNG<sup>109</sup> and half of those near Port Arthur LNG<sup>110</sup> have an annual income less than \$50,000. The region around the site of Corpus Christi LNG is 50 percent Latine and 35 percent low-income.<sup>111</sup> The region around Cameron LNG is an exception to this trend as a majority white community, though 29 percent are low income.<sup>112</sup> This demographic context reveals how Citi’s financing for these projects perpetuates environmental injustice in these communities.

TABLE 6: COMMUNITY DEMOGRAPHICS IN A 10 MILE RADIUS FROM CITI-FINANCED LNG TERMINALS, ACCORDING TO THE EPA’S ENVIRONMENTAL JUSTICE SCREENING AND MAPPING TOOL (EJSCREEN)

PROJECT	COUNTY	POPULATION	PEOPLE OF COLOR	LOW INCOME	LESS THAN A COLLEGE DEGREE	NON-ENGLISH SPEAKING AT HOME
Cameron LNG	Cameron Parish (LA)	5,629	8%	29%	74%	5%
Corpus Christi LNG	San Patricio County (TX)	49,876	56%	35%	73%	26%
Port Arthur LNG	Jefferson County (TX)	68,317	76%	49%	78%	34%
Sabine Pass LNG	Cameron Parish (LA)	10,062	93%	53%	85%	22%



## Enbridge & Formosa Plastics Group

Analysis was conducted at the corporate level for Enbridge, which is developing the Rio Bravo Pipeline, and Formosa Plastics, which is planning the Sunshine Project petrochemical complex. So far, Citi has provided general corporate financing for Enbridge and Formosa Plastics, but not direct project financing for the Rio Bravo Pipeline or the Sunshine Project. The majority of fossil fuel companies’ debt financing is for general corporate purposes, rather than project-specific financing, which only made up 4 percent of total fossil fuel companies’ debt from 2016 to 2022.<sup>113</sup> Yet Citi and other banks tend to focus on restricting project-related financing, rather than limiting their corporate financing, which still supports these companies’ fossil fuel expansion plans.

Enbridge’s total corporate emissions are estimated as 874.2 MMT CO<sub>2</sub>e/yr (including the company’s own estimated emissions and a third party estimate<sup>114</sup> of the downstream emissions from the oil and gas it transports, which Enbridge does not report). Citi’s financing for Enbridge is associated with 50.7 MMT

CO<sub>2</sub>e/yr, or the equivalent emissions from 13 coal plants or over 12 million gasoline cars driven for a year.<sup>115</sup> While Formosa Plastics does not report on its emissions for 2001 to 2015 (when Citi financed the company), Formosa Plastics reported 2022 GHG emissions of 47.29 million tons, similar to the emissions from 11 million gas-powered cars or 12.2 coal plants operating for a year.<sup>116</sup> Without a commitment to end corporate financing for petrochemical companies like Formosa Plastics, Citi will continue to enable more planet-warming emissions from fossil-fuel derived plastics.

**Citi’s financing for Enbridge is associated with 50.7 MMT CO<sub>2</sub>e/yr, or the equivalent emissions from 13 coal plants or over 12 million gasoline cars driven for a year.**

TABLE 7: CITI CORPORATE-LEVEL FINANCING AND FINANCED CORPORATE EMISSIONS FOR ENBRIDGE

ENBRIDGE TOTAL CORPORATE EMISSIONS (MMT CO <sub>2</sub> E/YR)	CITI FINANCED EMISSIONS (MMT CO <sub>2</sub> E/YR)	CITI FINANCED EMISSIONS EQUIVALENT: COAL PLANTS	CITI FINANCED EMISSIONS EQUIVALENT: CARS
874.2	50.7	13	12,066,998



RESEARCH FINDINGS

**If built, the air pollution estimated from Formosa Plastics’ Sunshine Project and Enbridge’s Rio Bravo Pipeline could result in as many as 13.2 premature deaths every year.**

The EPA’s COBRA tool is also used to estimate the health impacts projected from air pollution related to a compressor station that is planned for Enbridge’s Rio Bravo Pipeline, as well as related to Formosa Plastics’s proposed “Sunshine Project.” The methodology used is further detailed in Appendix 2. If successfully built, the air pollution estimated from these two projects could result in as many as 13.2 premature deaths every year (see Table 8). Citi has, to our knowledge, not yet provided direct financing for these projects, and therefore no attribution for the health impacts to the bank was calculated. However, Citi’s funding for Enbridge could enable the company’s plans to build the Rio Bravo Pipeline. In the case of the Sunshine Project, advocates are urging Citi, as a major funder of petrochemicals in the Gulf South, to deny any financing to Formosa Petrochemical Corporation<sup>117</sup> for their massive proposed facility in St. James Parish.

The demographics in the communities near these proposed projects are also illuminating. The counties through which the pipeline is slated to cross are 89 percent Latine and 67 percent Spanish-speaking, according to analysis conducted using EJScreen.<sup>118</sup> Fifty-two percent of the population is low-income, making \$50,000 or less in annual income.<sup>119</sup>

The immediate area surrounding the approximate site proposed for the “Sunshine Project” is 97 percent people of color and 61 percent low-income.<sup>120</sup> St. James Parish as a whole is 51 percent people of color and 31 percent low-income,<sup>121</sup> offering evidence of the racial disparities at play when the site for the polluting project was chosen.

**Conclusion**

This data provides a snapshot of the real harms associated with Citi’s fossil fuel and petrochemical financing in Gulf communities. All too often, it is low-income communities of color that bear the brunt of fossil fuel pollution and the disease – a pattern of environmental racism that will be further illustrated in the case studies to follow. These case studies will shed light on what these numbers mean for the community members who live through the impacts, and how they are fighting for a better future.

TABLE 8: HEALTH IMPACTS PROJECTED FROM ENBRIDGE’S RIO BRAVO PIPELINE (COMPRESSOR STATION) AND FORMOSA PLASTICS GROUP’S “SUNSHINE PROJECT”

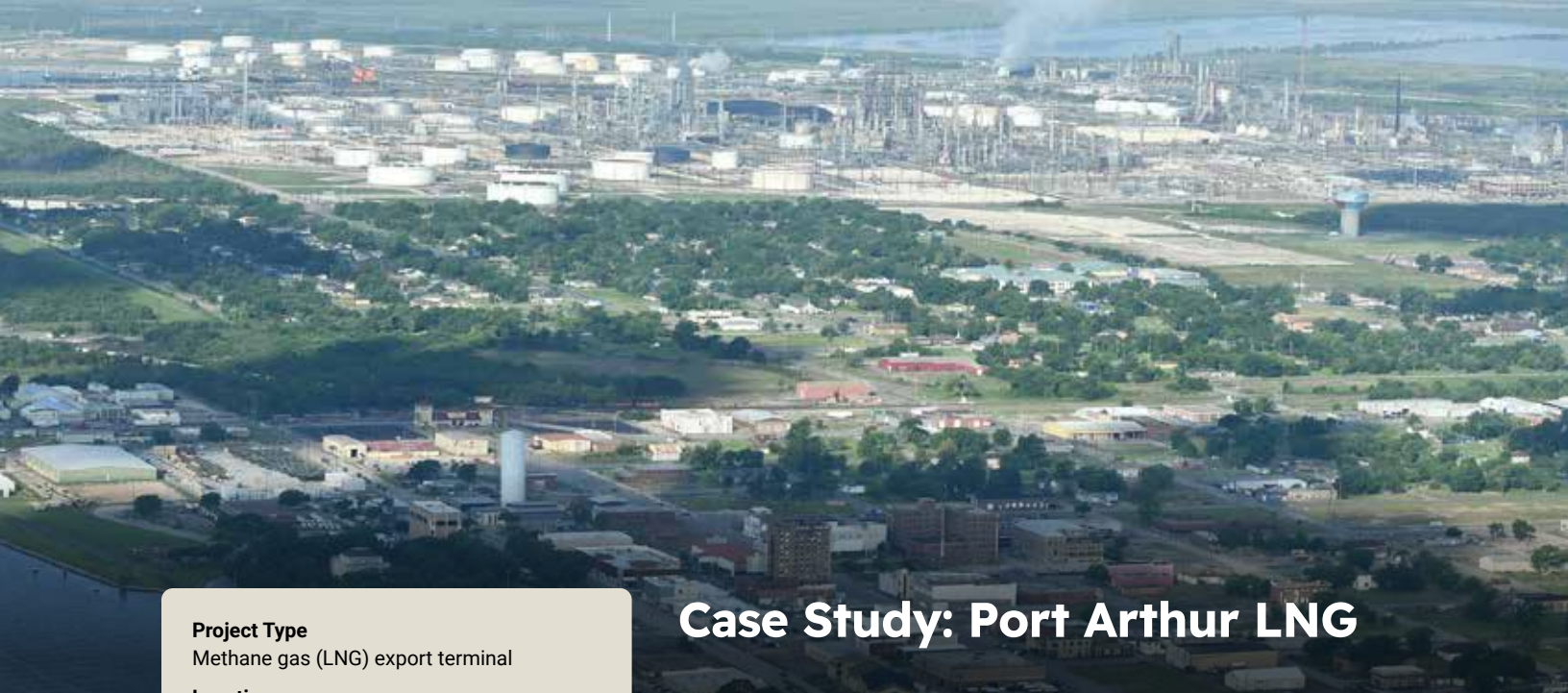
PROJECT	MORTALITY (HIGH ESTIMATE)	HEALTH COSTS (MLN USD)	ASTHMA ONSET	ASTHMA SYMPTOMS	LOST WORK DAYS	LOST SCHOOL DAYS
Rio Bravo Pipeline (Compressor Station 1)	1	\$15	4.7	730	37	360
Sunshine Project	12.2	\$188	37.9	6,072	473	2,631

TABLE 9: COMMUNITY DEMOGRAPHICS NEAR THE PROPOSED RIO BRAVO PIPELINE AND SUNSHINE PROJECT<sup>122</sup>

PROJECT	COUNTIES	PEOPLE OF COLOR	LOW INCOME	LESS THAN A COLLEGE DEGREE	NON-ENGLISH SPEAKING AT HOME
Rio Bravo Pipeline	Kleberg, Kenedy, Willacy, Cameron (TX)	91%	52%	73%	68%
Sunshine Project	St. James Parish (LA)	97%	61%	72%	1%



# Case Studies



## Case Study: Port Arthur LNG

DOWNTOWN PORT ARTHUR, TEXAS SHROUDED BY THE NEARBY VALERO OIL REFINERY. JUNE 12, 2023. PHOTO: © HEALTHY GULF, COURTESY SOUTHWINGS

### Project Type

Methane gas (LNG) export terminal

### Location

Port Arthur, Texas

### Project Status

Port Arthur LNG: Under construction

Port Arthur LNG Expansion: Proposed

### Cost to Build

\$15 billion

### Majority Owners

Sempra (Port Arthur LNG Expansion),

KKR (Port Arthur LNG)

### Lifecycle Emissions Estimate<sup>159</sup>

166 MMT CO<sub>2</sub>e per year (equivalent to 39.5 million gasoline-powered cars driven for one year)

### Citi's Financing<sup>160</sup>

\$371.93 million in financing for Port Arthur LNG LLC in 2023

\$7.3 billion in financing for Sempra & Sempra Global since 2016

### Citi's Financed Emissions

4.9 MMT CO<sub>2</sub>e per year (equivalent to 1.16 million gasoline-powered cars driven for one year)

### Annual Associated Health

#### Costs Attributable to Citi

\$6.7 million

### Community Demographics<sup>161</sup>

76% people of color

49% low-income

### Community Groups Resisting

Port Arthur Community Action Network

### Community Leaders Interviewed

John Beard Jr., Reginald Trainer

### Port Arthur: A Gem Dulled by Industry

The city of Port Arthur is a hidden gem in the state of Texas. It is the birthplace of the iconic rap duo Underground Kingz, rock legend Janis Joplin, acclaimed actress Amber Chardae Robinson, and pop artist Robert Rauschenberg. It has been celebrated as a premier birding destination, attracting tens of thousands of birds during their spring migration from South America to Canada. It is also the traditional lands of Indigenous peoples including the Atakapa-Ishak Nation, who lived for thousands of years in the coastal and bayou regions of southeast Texas and southwest Louisiana.<sup>123</sup> However, Port Arthur's unique cultural and ecological character can be overshadowed, and endangered, by the domineering presence of polluting industries.

**Port Arthur is one of 18 communities that bear more than 90 percent of all the climate pollution that the plastics industry reports to the EPA.**

Today, Port Arthur is one of the largest fossil fuel and petrochemical corridors in the country, with more than a dozen refineries and chemical plants packed into the area.<sup>124</sup> Port Arthur is one of 18 communities that bear more than 90 percent of all the climate pollution that the plastics industry reports to the EPA.<sup>125</sup> There are 60 companies in Jefferson County—where Port Arthur is located—that must report to the EPA for releasing harmful chemical waste.<sup>126</sup> In 2022, Jefferson County

## CASE STUDY PORT ARTHUR LNG

had reported nearly 15 million pounds of pollutants, including carcinogens, placing the region in the top 11 percent of all U.S. counties.<sup>127</sup> Unsurprisingly, residents suffer from higher-than-average rates of respiratory illnesses and cancer.<sup>128</sup> **“A lot of people in my family have passed on with cancer. Of course, this is a cancer city,”** Port Arthur resident and community advocate Reginald Trainer observes, **“We got people every day being diagnosed with cancer.”**

**Citi has funneled over \$7.3 billion into Sempra since 2016, and has directly financed Port Arthur LNG with a \$342 million loan in 2023, despite the clear evidence of deadly pollution that’s disproportionately impacting Black residents in Port Arthur.**

One fossil fuel project threatening the community right now is Port Arthur LNG, a natural gas liquefaction and export terminal whose first phase is already under construction. The terminal would receive methane gas and cool it to a liquid state at about -260 degrees Fahrenheit for shipping, primarily to Europe.<sup>129</sup> The project is being developed by Sempra Energy, ConocoPhillips, and private equity firm KKR.<sup>130</sup> The project consists of two phases: one already under construction, and another that is planned to double capacity. If fully constructed, the project would be capable of producing up to 27 million metric tons of LNG per year, releasing significant amounts of greenhouse gasses, nitrogen oxides, and particulate matter in the process.<sup>131</sup> Port Arthur LNG’s annual lifecycle greenhouse gas emissions<sup>132</sup> are projected to be the equivalent of 21 coal plants, or 19,754,151 gas-powered cars.<sup>133</sup> Air pollution projected from Port Arthur LNG, if completed, is estimated to cause as many as 7 deaths and nearly 4,000 instances of asthma symptoms annually in the region.<sup>134</sup> Sempra is also planning an expansion project that would double the first phase’s capacity.<sup>135</sup>

Citi has funneled over \$7.3 billion into Sempra since 2016, and has directly financed Port Arthur LNG with a \$342 million loan in 2023, per analysis using Banking on Climate Chaos,<sup>136</sup> despite the clear evidence of deadly pollution that is disproportionately impacting Black residents in Port Arthur. Indeed, Citi’s financing of the Port Arthur LNG terminal is associated with up to \$6.7 million in health costs and 117 lost school or work days out of total projected impacts, according to analysis conducted for this report.

**Black residents of Jefferson County have cancer rates that are 15 percent higher, and mortality rates from cancer over 40 percent higher than the average Texan.**

The demographics of Port Arthur reveal how industrial pollution and related health impacts in the community are issues of racial disparities. Eighty-two percent of Port Arthur’s residents are people of color, and half are low-income, according to analysis using the EPA’s EJScreen.<sup>137</sup> The median household income in Port Arthur is \$35,075 for Black households<sup>138</sup> compared to \$74,745 for the wealthier and whiter town of Nederland, just next to Port Arthur, for example.<sup>139</sup> Port Arthur, a largely Black and low-income community, experiences higher exposure to pollutants and worse health outcomes relative to state averages. For example, the city is in the 96th percentile for air toxics cancer risk in the state—an estimate of the lifetime inhalation cancer risk from carcinogens in the air, according to analysis from EJScreen.<sup>140</sup> Meanwhile, Black residents of Jefferson County have cancer rates that are 15 percent higher, and mortality rates from cancer over 40 percent higher than the average Texan.<sup>141</sup>

**“Pretty soon we ain’t gonna have...no Port Arthurans because they’ll all be dead and gone. I think race plays a big, big, big part of it. I really do, and I believe that from my heart. Because I can see it,”** says Port Arthur resident Reginald Trainer.

**“I think race plays a big, big, big part of it. I really do, and I believe that from my heart. Because I can see it,” says Port Arthur resident Reginald Trainer.**

### **“Born and Raised on the Fenceline”**

Reginald Trainer and John Beard Jr. are lifelong residents of Port Arthur and actively fighting for a better future for their city and the Gulf Coast at large. Beard’s family settled in Port Arthur in the early 20th century, with his father working at the Gulf Oil Corporation, now Valero. Trainer’s family is also rooted in the Gulf Coast: his mother was born in Port Arthur, while his dad was born across state lines in Franklin, Louisiana.

**“Born and raised on the fenceline; less than 200 feet from my house was the fence line for what’s now the largest refinery in the country,”** Beard recalls, referring to the Motiva Port Arthur Refinery, which has the capacity to produce 630,000 barrels of crude oil a day.<sup>142</sup>



JOHN BEARD JR., FOUNDER OF THE PORT ARTHUR COMMUNITY ACTION NETWORK (PACAN) IN FRONT OF AN INDUSTRIAL FACILITY. DECEMBER 8, 2022. PHOTO: © CARLO DOJMI DI DELUPIS / RECOMMON

Beard and Trainer both grew up inhaling sulfur dioxide and benzene, which are known carcinogens, emitted from the surrounding plants. There is no known acceptable amount of exposure to benzene, according to the World Health Organization.<sup>143</sup> Nevertheless, Port Arthur’s Total refinery exceeded EPA pollution limits for benzene in both 2019 and 2020.<sup>144</sup> **“You name it, it’s happening here. We’re home to the largest refinery in the country, Motiva, and two other refineries: Valero and Total,”** says Beard.

A study by the University of Texas Medical Branch at Galveston found that Port Arthur residents were four times more likely to suffer from a myriad of ailments, including heart and respiratory conditions, nervous system disorders, and other afflictions, compared to those who live 100 miles away.<sup>145</sup> Beard testifies to the health epidemic in Port Arthur. He says, **“Chronic illnesses and diseases, cancer running rampant in the community...You’d be hard pressed to find a substantial number of people whose lives have not been touched in some way by cancer. But it’s not just cancer. It’s respiratory illnesses, COPD, and emphysema.”**

Beard sees the health impacts of living amid pollution on his own family: his daughter had a tumor between her eye and brain removed, and his son had to receive a kidney transplant, though there’s no history of kidney issues in their family. Yet, Beard considers himself and his family one of the lucky ones. **“We’re just that fortunate, [but] you know, [I] got family members that are affected, got friends that are affected. The guys that worked with me at the plant, they’re no longer here. They didn’t get to retire like I did,”** Beard explains.

Beard and Trainer both worked in the fossil fuel industry—one of the few employment options available in Southeast Texas. The cruel irony of working for an industry that is killing you is not lost on Beard or Trainer, but for working class families, immediate needs come first. Trainer says, **“I was gonna do a job because I had a family to feed...Now you say ‘well, would you do it all over again, even if [it] would risk your life?’ Well, I would do it all over, for my family.”**

“I was gonna do a job because I had a family to feed...Now you say ‘well, would you do it all over again, even if [it] would risk your life?’ Well, I would do it all over, for my family.”

—REGINALD TRAINER

Invoking the myth that the industry will bring economic prosperity through local jobs, politicians and corporate lobbyists justify an estimated \$20.5 billion dollars in annual U.S. subsidies to the fossil fuel industry.<sup>146</sup> However, Beard makes it plain that the presence of heavy industry has not brought prosperity. **“All of the negative statistics that point to a lack of wealth, a lack of opportunity, joblessness, urban blight...the city I grew up [in] was alive and vibrant and a place that you could call home,”** Beard says. In fact, a study found that Black workers hold 10 percent of the jobs at industrial facilities, but bear 17 percent of the exposure to toxic emissions. The same study found that Latine workers hold 9.8 percent of industrial jobs, while being exposed to 15 percent of pollution.<sup>147</sup>

These facilities also pose the constant risk of explosions, such as the “entirely preventable” 2019 explosions from the 80-year-old Port Neches petrochemical plant in Port Arthur. The disaster forced thousands to evacuate, released over 11 million pounds of toxic pollutants, and caused nearly \$130 million in damage.<sup>148</sup> The plant owner, TPC Group (formerly Texas Petrochemicals), was charged with criminal penalties for knowingly failing to take precautions to avoid the catastrophe.<sup>149</sup>

These safety risks are compounded by the increasing frequency and intensity of climate-related disasters such as hurricanes, floods, and tornadoes to which the region is prone.<sup>150</sup> Port Arthur was devastated by Hurricane Harvey in 2017, which damaged or destroyed over 80 percent of the area’s homes, and whose impact was particularly felt by Black residents.<sup>151</sup> Hurricanes Laura and Delta followed in 2020, piling onto the wreckage.<sup>152</sup>



JOHN BEARD, JR. HONORS COMMUNITY MEMBERS LOST TO ILLNESS DURING A PROTEST CALLING ON THE BIDEN ADMINISTRATION TO DECLARE A CLIMATE EMERGENCY. OCTOBER 25, 2022.

Such disasters then increase the risks of additional pollution releases and explosions, posing severe safety hazards for the local community. For example, reports show that Hurricane Harvey caused the unexpected release of 14.2 million pounds of air pollutants in the Beaumont-Port Arthur, Houston and Corpus Christi areas.<sup>153</sup>

### Invest in People, Not Fossil Fuels

John Beard and Reginald Trainer are now actively fighting for a better future for their city and the Gulf Coast at large by dedicating their time to community and environmental advocacy. In response to the influx of industry, Beard started organizing with community members like Trainer to fight for environmental, social, and restorative justice in the area through the Port Arthur Community Action Network (PACAN). Beard first started PACAN to fight for stronger community reparations after a local refinery released excess benzene, a carcinogen, in majority Black neighborhoods El Vista and Vista Village, in violation of the Clean Air Act.<sup>154</sup> Three years later, in the aftermath of Hurricane Harvey, Beard secured a nearly half a million dollar grant to help put displaced people back into their homes. They’ve kept fighting for environmental justice ever since.



INDUSTRIAL SMOKESTACKS VISIBLE FROM A PLAYGROUND IN PORT ARTHUR, TEXAS. PHOTO: DAYNA REGGERO

**Beard first started PACAN to fight for stronger community reparations after a local refinery released excess benzene, a carcinogen, in majority Black neighborhoods El Vista and Vista Village, in violation of the Clean Air Act.**

**“It’s petrochemical infrastructure. It’s tank farms. It’s units, it’s pipelines...[that are] contributing to climate change, global warming, and some of the highest rates of cancer and respiratory illness in America, right here. So that’s why we fight.**

**That’s why I decided to push back,”** Beard says.

Trainer joined PACAN and became a leader, raising awareness around the need for compliance managers to monitor air quality. Illegal emissions are rarely reported or reprimanded. According to a 2016 report by the Environmental Integrity Project, Texas regulators failed to issue fines for over 97 percent of illegal air pollution released from refineries and chemical plants.<sup>155</sup> **“We need a compliance manager here. They won’t do it,”** Trainer asserts.

PACAN’s fight to stop Port Arthur LNG has been marked by significant legal battles, one of which resulted in the overturning of a permit the state environmental regulator issued to Port Arthur LNG.<sup>156</sup> Despite the legal victory, TCEQ defied the ruling and allowed Sempra to continue construction under existing permits, prompting further criticism from PACAN and its allies.<sup>157</sup>

Meanwhile, Sempra tries to charm Port Arthur residents by positioning itself as a friend of the community, including by providing small grants for local efforts like neighborhood trash clean-up and environmental education.<sup>158</sup> Beard sees through their act, saying, **“[Sempra] likes to point out the good things they do. [They try] to get [citizens] to write in letters of recommendation to the city council, and do all of this fluff...But they never tell you about the dangers and the hazards they create. Nor the role they have in climate change and global warming by their emissions.”**

PACAN counteracts Sempra and other companies’ paltry attempts to buy goodwill with their own public education campaigns. The group conducts “toxic tours”—guided tours of hazardous facilities in the area—for public officials, journalists, and NGOs.



## CASE STUDY PORT ARTHUR LNG

Beard says **“We don’t have to make this up. Let your eyes see what’s here.”** While leading a toxic tour, Beard vividly describes the plight of one local family whose home abuts an enormous industry tank labeled: “Caution: flammable,” that emits harmful fumes daily.

**“We don’t have to make this up. Let your eyes see what’s here,” says Beard on why his organization, PACAN conducts “toxic tours”—guided tours of hazardous facilities in the area—for public officials, journalists, and NGOs.**

**“The cost of breathing free and fighting pollution, fighting these health issues...is being very vigilant. Education and vigilance,”** says Beard.

Beyond fighting to end the harm, PACAN is also working to bring their vision of a just transition for Port Arthur to life. Projects include using a \$1.5 million grant to improve energy efficiency in 100 homes, a comprehensive study of the health impacts of pollution on Port Arthur residents, an environmental health fair, and building a community air monitoring network. The group dreams of creating a local renewable energy economy, and starting green energy training at technical schools and universities, so that these jobs stay local with the future generations.

Trainer remains hopeful for the future. He believes in a reality where his descendants are healthy and thriving in Southeast Texas, free from the dangers of breathing in toxic air, and safe from the harms of natural disasters. **“I’m trying to make something better for my grandkids,”** says Trainer, **“That’s what we’re trying to do here with PACAN and the city of Port Arthur. Port Arthur has the potential to be a little diamond in the rough.”**



LIFELONG PORT ARTHUR RESIDENT REGINALD TRAINER JOINED THE PORT ARTHUR COMMUNITY ACTION NETWORK (PACAN) TO ADVOCATE FOR BETTER AIR QUALITY IN HIS NEIGHBORHOOD. PHOTO: COURTESY REGINALD TRAINER

**“I’m trying to make something better for my grandkids,” says Trainer, “That’s what we’re trying to do here with PACAN and the city of Port Arthur. Port Arthur has the potential to be a little diamond in the rough.”**

As PACAN turns their dreams into action, they are resolute in exposing Citi’s role in undermining that vision by bolstering the pollution economy in Port Arthur. **“The problem I do have with you making money is you’re doing it at the expense of our lives. And that’s not an acceptable situation. You have to do better. And the companies that you deal with have to do better,”** Beard declares.

**“The problem I do have with you making money is you’re doing it at the expense of our lives,” says Beard.**

With the stark examples of harm facing these communities, it begs the question of what Citi’s true values are. Beard emphasizes his vision for what Citi should do: **“We want Citibank to cease and desist those practices that are creating harm in our communities by investing in fossil fuels and petrochemicals and focus more on clean green, renewable energy and renewable energy jobs. We also want them to undo the harm they’ve already done in our communities by reinvesting in community**

redevelopment in terms of affordable housing, those jobs and opportunities I’ve talked about. Put them into people, because the return on doing it with people is many-fold more than what you’re going to get from just fossil fuels. We’re asking them to humanize themselves and invest in people.”

**“We’re asking [Citi] to humanize themselves and invest in people,” says Beard.**

Trainer concludes: **“We already know what we’re going through. We already know where we’ve been. But can we fix the problem? And until God takes me home, that’s what I’m gonna be trying to do.”**



JOHN BEARD, JR., ADDRESSES A CROWD IN FRONT OF THE WHITE HOUSE, CALLING ON PRESIDENT BIDEN TO STOP FOSSIL FUEL EXPANSION IN THE GULF SOUTH. OCTOBER 22, 2022.



## Case Study: Rio Bravo Pipeline

### Project Type

Methane gas pipeline

### Location

From near Kingsville, Texas to the proposed Rio Grande LNG facility at Port of Brownsville, Texas

### Project Status

Proposed, pre-construction

### Cost to Build

\$2.17 billion

### Majority Owner

Enbridge

### Lifecycle Emissions Estimate<sup>162</sup>

165.3 MMT CO<sub>2</sub>e per year (equivalent to 39 million gasoline-powered cars driven for one year)

### Citi's Financing<sup>163</sup>

\$9 billion in committed financing for parent company Enbridge since 2016

### Citi's Financed Emissions for Enbridge

50.7 MMT CO<sub>2</sub>e per year (equivalent to 12 million gasoline-powered cars driven for one year)

### Annual Associated Health Costs

\$15 million

### Community Demographics<sup>164</sup>

89% Latine  
69% Spanish speakers  
52% low income

### Community Groups Resisting

Carrizo Comecrudo Tribe of South Texas

### Community Leaders Interviewed

Juan Mancias, Dr. Christopher Basaldú

THE RIO GRANDE RIVER IS KNOWN AS THE SPIRIT RIVER BY THE ESTO'K GNA, OR CARRIZO COMECRUDO TRIBE OF SOUTH TEXAS. MARCH 3, 2023.

### Somi Sek: Sacred Lands of the Esto'k Gna

The Esto'k Gna—which translates to “human being”—are a people that originate from the mouth of the Rio Grande River. Their sacred land, Somi Sek, holds millennia of Indigenous culture, heritage, and spirituality. This land encompasses diverse ecosystems, historical village sites, and sacred burial grounds. But Somi Sek is not just historical; the land is a living elder of the Carrizo Comecrudo Tribe, and where many of the Esto'k Gna still live.

**“Our homelands are not simply the Brownsville area.**

**Traditional Indigenous homelands are far and wide. Brownsville and surrounding areas are included in Somi Sek,”** explains Dr. Christopher Basaldú, a member of the Carrizo Comecrudo Tribe of South Texas, or the Esto'k Gna.

Somi Sek is also known as the Rio Grande Valley, a vibrant region that spans south Texas into Mexico, situated along the Rio Grande River Delta where the Rio Grande River meets the Gulf of Mexico. The Rio Grande Valley is predominantly a Latine community with over 1.3 million residents.<sup>165</sup> This unique ecological region fosters incredible biodiversity, which is a critical part of local culture, including Indigenous culture, and the region's eco-tourism economy. It's home to several endangered species, such as the ocelot<sup>166</sup> and Kemp's Ridley sea turtle,<sup>167</sup> and is also a critical sanctuary for migratory birds.<sup>168</sup> Fishers and shrimpers were able to flourish in this area for generations due to the healthy and intact coastal ecosystems, contributing to a thriving local nature-based economy.<sup>169</sup>

## CASE STUDY RIO BRAVO PIPELINE

**“There’s a lot of beauty down here. What’s called the Rio Grande, we call it the Spirit River. For our ancestral Native people, for the Carrizo, the river was never a border. It’s the result of colonization that’s creating it as a violent border,”** says Dr. Basaldú.

The region is one of the last remaining areas of the Texas Gulf Coast that are largely undeveloped by the fossil fuel and petrochemical industry.<sup>170</sup> For the past decade, however, the Rio Grande Valley has been a target for an LNG export buildout—including the Rio Bravo Pipeline being developed by Enbridge, one of Citi’s biggest clients, which threatens the local community’s way of life, health, and ties to the environment. Fossil fuel companies and regulatory agencies have largely ignored the needs of the Rio

Grande Valley communities, which have been actively opposing new fossil fuel developments in the region. Local communities that would be impacted by these projects, including the City of Port Isabel, South Padre Island, Laguna Vista, and Long Island Village residential community have all passed anti-LNG resolutions.<sup>171</sup>

Enbridge’s Rio Bravo Pipeline is one example of harmful development that communities are fighting. This proposed \$2.1 billion project would transport 4.5 billion cubic feet per day of methane gas fracked from the Permian Basin in West Texas to the planned Rio Grande LNG terminal at the Port of Brownsville.<sup>172</sup> If built, Rio Grande LNG would be one of North America’s largest LNG export terminals, capable of producing enough liquefied natural gas to heat and cool around 34 million households per year.<sup>173</sup>

The Rio Bravo Pipeline’s lifecycle emissions are estimated at 165.3 million metric tons of CO<sub>2</sub> equivalent per year, which is comparable to the emissions from approximately 39 million cars on the road annually.<sup>174</sup> The pipeline requires a new compressor station, which acts as a “pit stop” to keep gas moving through long pipeline networks, meanwhile releasing toxic emissions.<sup>175</sup>

Analysis for this report found that, if the pipeline project is built, the air pollution from its compressor station could result in up to \$15 million in health care costs, 730 instances of asthma symptoms, and 387 lost work and school days every year (see Table 8).

**If the Rio Bravo Pipeline project is built, the air pollution from its compressor station could result in up to \$15 million in health care costs, 730 instances of asthma symptoms, and nearly 400 lost work and school days every year.**



THE PROPOSED ROUTE OF THE RIO BRAVO PIPELINE FROM KLEBERG COUNTY TO CAMERON COUNTY, TEXAS.  
PHOTO: FEDERAL ENERGY REGULATORY COMMISSION

## CASE STUDY RIO BRAVO PIPELINE

Citi is a major financier of Enbridge, developer of the Rio Bravo Pipeline and other pipelines that threaten Indigenous lands, such as the controversial Line 3 expansion.<sup>176</sup> Citi has committed over \$9 billion into the company since 2016 and more than \$2 billion in financing for Enbridge and its subsidiaries in 2023 alone, making it the bank's single largest fossil fuel client that year.<sup>177</sup> Citi's emissions associated with its financing for Enbridge is equivalent to 12 million gas-powered cars on the road for one year (see Table 7).

**Citi committed more than \$2 billion in financing for Enbridge, developer of the Rio Bravo Pipeline, and its subsidiaries in 2023 alone, making it the bank's single largest fossil fuel client that year.**

The health issues faced by Rio Grande Valley residents would be exacerbated if the proposed LNG developments go forward. The region already struggles with significant health disparities, which are further aggravated by climate change.<sup>178</sup> These health disparities include higher rates of cancer and birth defects, especially among Latine residents,<sup>179</sup> and increased prevalence of childhood asthma, with rates twice as high for Black children than for white children.<sup>180</sup> The added toxic emissions would pollute low-income and Latine neighborhoods, such as Laguna Heights and Port Isabel, near the proposed pipeline and Rio Grande LNG terminal. Across the counties that the pipeline route would run through, 89 percent of the communities are Latine, 68 percent do not speak English at home, and 52 percent are low income, according to EJScreen.<sup>181</sup> The median household income in some neighborhoods is strikingly low, around \$29,178 in Laguna Heights<sup>182</sup> and \$42,691 in Port Isabel, for example.<sup>183</sup>



COMMUNITY MEMBER WOLF RAMIREZ LOOKS OUT AT THE SITE FOR A PROPOSED LNG FACILITY IN THE RIO GRANDE VALLEY OF TEXAS. APRIL 2, 2023.

## The Rio Bravo Pipeline: A Threat to Heritage and the Future

The Rio Bravo Pipeline is an active threat to the heritage and people of the Esto'k Gna, adding to the violence that local people already experience through the imposition of a militarized border wall. Currently the area is one of the most heavily militarized regions in the country, due to the U.S. Border Patrol's presence.<sup>184</sup> The militarization involves frequent surveillance, checkpoints, and the presence of armed officers, which create a climate of fear and tension for residents and advocates. There have been reports of aggressive tactics by Border Patrol agents, including intimidation and harassment of local communities and those involved in peaceful protest activities.<sup>185</sup>

**“All of this is happening within the context of increasing border militarization and increasing law enforcement, surveillance from multiple law enforcement agencies at all levels federal, state, and local,”** says Dr. Basaldú.

Stopping fossil fuel development is becoming even more difficult as states are increasingly criminalizing protest. The State of Texas has so-called “Critical Infrastructure Laws”, which classify protesting against fossil fuel projects as a felony.<sup>186</sup> This legislation significantly increases the legal risks for advocates, making organizing against LNG projects particularly perilous. These laws can lead to severe penalties, including long prison sentences for vaguely defined “interference” or “tampering” with fossil fuel facilities.<sup>187</sup> This legal environment discourages nonviolent protest by threatening severe consequences for those who advocate against environmental injustices, especially in immigrant communities.

The suite of LNG projects proposed in the region—Rio Grande LNG, Texas LNG, and the Rio Bravo Pipeline, are attempting moving forwards despite local opposition.<sup>188</sup> The Carrizo Comecrudo Tribe has not consented to the development of the LNG projects or the Rio Bravo Pipeline, says Dr. Basaldú,

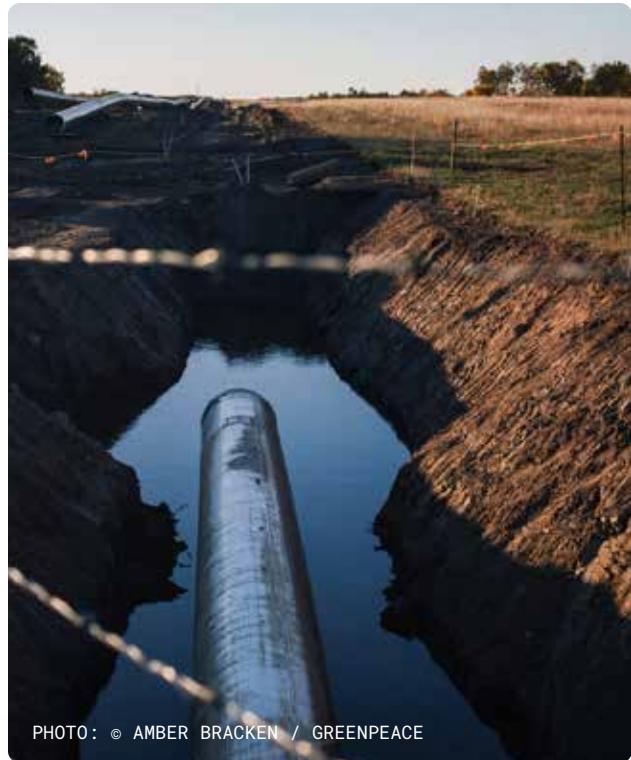


PHOTO: © AMBER BRACKEN / GREENPEACE

ANOTHER ENBRIDGE PIPELINE PROJECT, THE LINE 3 EXPANSION IN ALBERTA, CANADA, IS FIERCELY OPPOSED BY INDIGENOUS COMMUNITIES AND ALLIES. SEPTEMBER 28, 2017.

citing the internationally recognized right of Indigenous Peoples to Free, Prior, and Informed Consent on projects that impact their lands. This negligence is no surprise when it comes to Enbridge's history. **“Enbridge has a very horrible safety record when it comes to its pipelines. They should be dissolved and dismantled for the environmental damage they've already done and for ignoring tribal sovereignty,”** says Dr. Basaldú.

**The Carrizo Comecrudo Tribe has not consented to the development of the LNG projects or the Rio Bravo Pipeline, says Dr. Basaldú, citing their right to Free, Prior, and Informed Consent.**



DR. CHRISTOPHER BASALDÚ SPEAKS AT A COMMUNITY FORUM IN BROWNSVILLE, TEXAS. APRIL 1, 2023.

Enbridge’s record of safety and environmental violations foreshadows what could happen in the Rio Grande Valley with the Rio Bravo Pipeline. Its history of environmental violations include the 2010 Kalamazoo River oil spill, which released over a million gallons of oil and is still one of the largest inland oil spills in U.S. history.<sup>189</sup> The Line 5 pipeline has spilled over 1 million gallons of oil since 1968, estimates the National Wildlife Federation.<sup>190</sup>

Two of Enbridge’s recent controversial pipeline projects, the Line 5 and the Line 3 replacement, exemplify how the company’s disregard for Indigenous sovereignty and environmental integrity go hand-in-hand. More than 60 Indigenous nations have voiced their opposition to Line 5,<sup>191</sup> while Indigenous women and allies have led protests and legal battles to stop Line 3, citing risks to water sources, wild rice beds, and overall environmental health.<sup>192</sup>

Development of LNG infrastructure in the Rio Grande Valley would also worsen the area’s existing

climate and environmental issues. South Texas has been experiencing severe and prolonged droughts, exacerbating water scarcity and threatening the region’s water supply.<sup>193</sup> In April 2024, the valley’s Hidalgo and Cameron Counties issued drought disaster declarations in response to critical water shortages.<sup>194</sup> The construction and operation of LNG facilities, like Rio Grande LNG and the Rio Bravo Pipeline, would require substantial amounts of water.<sup>195</sup> LNG operations would also lead to water pollution and contamination.<sup>196</sup>

Additionally, LNG development would worsen the threats that the community is already facing from SpaceX, Elon Musk’s launch pad. In 2023, a rocket launch at SpaceX led to an explosion that rained rocket debris onto nearby neighborhoods.<sup>197</sup> Community advocates and the Carrizo Comecrudo Tribe have pointed to SpaceX and LNG as a double threat to the local residents and the region’s sensitive ecosystems, which are home to several endangered species.<sup>198</sup>

## Fighting The Monster & Winning Land Back

The Carrizo Comecrudo Tribe is actively buying land along the pipeline route to prevent construction and protect their ancestral lands.<sup>199</sup> These efforts are part of the broader Land Back Movement, which aims to restore Indigenous stewardship and sovereignty over historically seized lands. Juan Mancias, Tribal Chairman of the Carrizo Comecrudo Tribe of South Texas, is spearheading these efforts.

**“[Enbridge] is coming through three of our properties that we purchased and has decided that they will come through with the Rio Bravo Pipeline...Right now, they’re at a standstill because we have a lawsuit against [the Federal Energy Regulatory Commission (FERC)] for [approving] the permit they gave to [Rio Grande LNG],”** says Mancias, highlighting the direct impact of Enbridge’s Rio Bravo Pipeline on his community and their organized efforts to halt development.<sup>200</sup>

Citi is all too aware of the controversy surrounding its funding of Enbridge. At the bank’s annual meeting in April 2024, Mancias presented a shareholder

resolution on Citi’s Indigenous Rights policies, citing the Rio Bravo pipeline as an example. CEO Jane Fraser responded, insisting “we are fully committed to respecting human rights.”<sup>201</sup>

Despite community opposition, in October 2022, NextDecade began site preparation for Rio Grande LNG by clear-cutting mangrove forests, wetlands, and plowing under sacred land.<sup>202</sup> The company proceeded in spite of FERC’s own acknowledgement that the Rio Grande LNG site, which is a total of 1,000 acres, contains “natural landforms (lomas) that are considered to have a high potential for containing archaeological sites.”<sup>203</sup> Meanwhile, NextDecade claimed that no artifacts or archaeological remains were found in the area, which the Carrizo Comecrudo Tribe vehemently contests.<sup>204</sup>

**“There’s no way you bulldozed, clear-cut 900 acres in southeastern Cameron County and turned up nothing. You’ve just destroyed not just plants and animals but natural features relevant to Carrizo perception, worldview, and relationality,”** emphasizes Dr. Basaldú.



TRIBAL CHAIRMAN JUAN MANCIAS OF THE CARRIZO/COMECRUDO TRIBE OF SOUTH TEXAS HOLDS A POSTER NEAR THE SITE OF A PROPOSED LNG FACILITY IN HIS COMMUNITY. APRIL 2, 2023.



Mancias reveals the sacred significance of Garcia Pasture, a national archaeological site, recognized by the World Monument Heritage Fund, comprising village ruins and burial sites, located near the proposed Texas LNG site.<sup>205</sup> He explains: **“This place has been looted over the years,”** describing how archaeologists in the 1930’s unearthed grave sites and desecrated a site that is sacred to the Carrizo Comecrudo.<sup>206</sup> Harming Garcia Pasture, along with *Somi Sek* as a whole, is a violent act against the Carrizo Comecrudo Tribe. Destroying Indigenous sacred sites prevents Indigenous people from connecting with their history, culture, and ancestors. The Carrizo Comecrudo Tribe is not federally recognized as an Indigenous people, despite strong historical evidence and their testimony.<sup>207</sup> This erasure means that the Carrizo Comecrudo lack protections they might otherwise have against resource extraction that threatens their ancestral lands.<sup>208</sup> **“It’s all Indigenous land, even though a lot of that land is stolen,”** says Dr. Basaldú. **“State governments and federal governments certify that theft through their laws.”**



TRIBAL CHAIRMAN JUAN MANCIAS ADDRESSES THE CROWD AT A PROTEST OUTSIDE OF THE WHITE HOUSE CALLING FOR PRESIDENT BIDEN TO DECLARE A CLIMATE EMERGENCY. OCTOBER 25, 2022.

While artifacts are important, the land itself is just as crucial to the Carrizo Comecrudo’s relationship and survival of their own culture. Traditional plants like Sotol, used for making fishing nets, and entire areas of black mangroves have also been cleared by NextDecade, shares Mancias.

In the course of their years-long resistance, the Carrizo Comecrudo Tribe and local advocates have had some success in mobilizing the community and in slowing down the LNG buildout. In 2021, the proposed Annova LNG terminal was canceled,<sup>209</sup> and several financial institutions have withdrawn their support of LNG projects in the region. In 2017, the major international bank, BNP Paribas, committed to no longer finance projects exporting fracked gas,<sup>210</sup> effectively ending its role in financing the Texas LNG project after pressure from advocates.<sup>211</sup> This decision was followed by French bank Société Générale pulling out of the Rio Grande LNG project in 2022.<sup>212</sup> **“We’re holding them off with these lawsuits. But we need more capacity to continue fighting this massive monster,”** says Mancias.

**“We’re holding them off with these lawsuits. But we need more capacity to continue fighting this massive monster,” says Mancias.**

In a recent victory for communities, a court decision has effectively canceled FERC’s authorization of the Rio Bravo Pipeline, Rio Grande LNG and Texas LNG, putting the future of the projects in jeopardy.<sup>213</sup> Mancias called the move **“a victory for our ancestors and for the land,”** vowing to **“continue to resist colonization, genocide, and erasure. In this case, we continue to resist ongoing colonization by the fossil fuel industry and against the Rio Grande LNG and Texas LNG projects.”**<sup>214</sup> This leaves a crucial decision point for the projects’ current and prospective financiers, who should take the environmental, community health, and financial risks related to these projects seriously.

## CASE STUDY RIO BRAVO PIPELINE

For the fossil fuel industry, pollution and environmental destruction are merely items on a balance sheet—simply results of routine business transactions. But financial institutions, like Citi, have a choice. BNP Paribas and Société Générale’s withdrawal of support has made an enormous impact on the community efforts to protect the Rio Grande Valley from pollution and environmental destruction, and show that it’s always possible to change directions for the better. Citi should not only follow their lead, but surpass its peers by dropping their support of Enbridge altogether, and lead other financial institutions to work with local communities to build a better future.

The Carrizo Comecrudo’s unwavering resistance exemplifies more than just a fight against environmental degradation; it is a profound struggle

for cultural survival and sovereignty. In order for the Rio Grande Valley to be truly protected from the exploitative reign of LNG, respecting the Carrizo Comecrudo’s rights as original stewards of these lands is essential.

As Dr. Basaldú powerfully asserts: **“These oil and gas companies want to sacrifice our land and sacred sites here. The people don’t want these polluting oil and gas projects. We want our sacred land back.”**

**“The people don’t want these polluting oil and gas projects. We want our sacred land back.”**

— DR. CHRISTOPHER BASALDÚ



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YOUTH PARTICIPANTS IN THE CARRIZO/COMECRUDO TRIBE’S ANCESTRAL RUN/WALK FROM THE PERMIAN BASIN TO BOCA CHICA TO HONOR SACRED SITES THAT ARE ENDANGERED BY OIL AND GAS DEVELOPMENT. MARCH 25, 2023.



## Case Study: Sunshine Project

### Project Type

Petrochemical complex

### Location

St. James Parish, Louisiana

### Project Status

Proposed, pre-construction

### Cost to Build<sup>215</sup>

\$12 billion

### Majority Owner

Formosa Petrochemical Corporation

### Project Emissions Estimate<sup>216</sup>

13.6 MMT CO<sub>2</sub>e per year (equivalent to 3 million gasoline-powered cars drive for one year)

### Citi's Financing<sup>217</sup>

\$668 million in financing for Formosa Plastics Group from 2001-2015

### Formosa Plastics Greenhouse Gas Emissions

47.29 million tons (equivalent to 11 million gas-powered cars driven for one year)

### Annual Associated Health Costs

\$150 million

### Community Demographics<sup>218</sup>

97% People of Color  
61% low-income

### Community Groups Resisting

RISE St. James

### Community Members Interviewed

Shamell Lavigne

### Welcome, Louisiana: “A Vibrant Place”

As Shamell Lavigne remembers it, her hometown of Welcome, Louisiana, a small community in St. James Parish, lived up to its name by offering all the comforts one could need. Lavigne recalls the sweeping sugar cane fields, picking wild blackberries off the vine, and running through her grandfather's thriving pastures.

**“It was just a vibrant place. I would spend a lot of time outside with my siblings, playing in the yard. We would explore the fields. We would go to my grandparents' house, [and] we would play in the pasture because my grandfather raised cattle, [and] he had hogs and chickens,”** Lavigne describes.

Lavigne's childhood was during a time when Black-owned businesses flourished in Welcome, from grocery stores to pool halls. St. James Parish is home to several historically Black communities and freedmen's towns. Descendants of formerly enslaved people had reclaimed lands in St. James Parish generations ago, forming communities like Lavigne's Welcome, where Black families could live and thrive. The area is also the homeland of the Chitimacha, a matrilineal tribe whose precolonial territory spanned from modern Lafayette towards New Orleans.<sup>219</sup>



SHAMELL LAVIGNE'S GREAT GRANDPARENTS, VELMONT AND CLARA CALVEY, LIVED IN ST. JAMES, LOUISIANA. PHOTO: COURTESY OF SHAMELL LAVIGNE.

**St. James Parish is home to several historically Black communities and freedmen’s towns. Descendants of formerly enslaved people had reclaimed lands in St. James Parish generations ago, forming communities like Lavigne’s Welcome, where Black families could live and thrive.**

Lavigne’s own family’s roots stretch back six generations in St. James Parish. Her family, along with many others, created communities there grounded in belonging and rootedness, where the town’s namesake was exactly how they felt.

Today, the cherished landscape of Lavigne’s youth is now marred by industrial facilities that surround the area, trapping residents in highly polluted air. St. James Parish is part of “Cancer Alley,” an 85-mile stretch along the Mississippi River between Baton Rouge and New Orleans, where around 200 petrochemical plants and refineries operate.<sup>220</sup>



FORMOSA PLASTICS’ PROPOSED SITE FOR THE “SUNSHINE PROJECT,” SURROUNDED BY NEARBY INDUSTRIAL DEVELOPMENT. SOURCE: JUSTIN KRAY ON BEHALF OF INCLUSIVE LOUISIANA AND CENTER FOR CONSTITUTIONAL RIGHTS



AN EXXONMOBIL FACILITY LOCATED ACROSS THE ROAD FROM A CEMETERY IN ST. JAMES, LOUISIANA. JANUARY 17, 2024.

St. James Parish alone has more than 30 industrial sites, including around a dozen petrochemical plants.<sup>221</sup> This concentration of industry is notably skewed towards the majority Black, lower-income 4th and 5th districts in the Parish, which includes Lavigne’s home town of Welcome.<sup>222</sup> According to the Environmental Protection Agency, there are 11 Toxics Release Inventory sites in the parish, five in the 4th district and four in the 5th, meaning they are home to facilities that release chemicals linked to cancer and other health effects in these communities.<sup>223</sup>

**St. James Parish alone has more than 30 industrial sites, including around a dozen petrochemical plants. This concentration of industry is notably skewed towards the majority Black, lower-income 4th and 5th districts in the Parish, which includes Lavigne’s home town of Welcome.**



A PROMINENT SIGN OUTSIDE OF THE LAVIGNES' HOME IN ST. JAMES INVITES NEIGHBORS TO JOIN THE FIGHT AGAINST FORMOSA PLASTICS. JANUARY 17, 2024.

**“I would say I had a wonderful childhood growing up in St. James,” says Lavigne. “And it’s not the same anymore...because there’s 12 petrochemical industries within a 10 mile radius in St. James.”**

The racial disparities are significant, with Black residents making up nearly 90 percent of the population in the 5th district and over 50 percent in the 4th district.<sup>224</sup> The poverty rate in St. James Parish is 20.4 percent among Black residents; significantly higher than the 3 percent poverty rate for White residents.<sup>225</sup> The parish government’s policies as well as state regulators have exacerbated these disparities. A lawsuit highlights that St. James Parish officials have consistently approved the establishment of heavy industrial facilities in the 4th and 5th districts while rejecting similar projects in majority-white communities for the past 46 years.<sup>226</sup> Meanwhile, a 2023 study found that the Louisiana Department of Environmental Quality (LDEQ) permitted emissions that were 7- to 21-fold higher in Black communities than in predominantly white communities.<sup>227</sup>

And more industrial development is underway. Among the most controversial planned industrial projects in St. James is the proposed \$12 billion Formosa Plastics so-called “Sunshine Project,” which was originally proposed in 2018. The Sunshine Project

would be the largest plastic manufacturing facility in the country: the petrochemical complex would include 16 separate facilities spread across the 2,400 acres.<sup>228</sup> It is projected to emit over 13 million tons of greenhouse gasses annually, the equivalent to emissions from 2.8 million gasoline-powered cars driving for a year.<sup>229</sup> The estimated health impacts from air pollution if the project is built include up to \$188 million in related health costs, 6,072 instances of asthma symptoms, 473 lost work days, 2,631 lost school days, and 12.2 deaths per year, per analysis for this report (Table 8).

**The estimated health impacts from air pollution if the project is built include up to \$188 million in related health costs, 6,072 instances of asthma symptoms, 473 lost work days, 2,631 lost school days, and 12.2 deaths per year.**

Citi has provided \$668 million in financing for Formosa Plastics from 2001 to 2015, and had the most regular relationship with the company of any U.S. bank during this period.<sup>230</sup> Citi is one of the

## CASE STUDY SUNSHINE PROJECT

top banks to finance petrochemical companies in the U.S. Gulf South,<sup>231</sup> and a major financier of companies along the plastic value chain globally.<sup>232</sup> Citi currently has no policy commitments not to finance this toxic sector. There is a growing movement from Gulf community leaders and their allies urging the bank not to finance the Sunshine Project or any petrochemical facilities.

**Citi has provided \$668 million in financing for Formosa Plastics from 2001 to 2015, and had the most regular relationship with the company of any U.S. bank during this period.**

The proposed plant is slated to produce polyethylene, polypropylene, polymer, and ethylene glycol—chemicals used in making single-use plastics and antifreeze.<sup>233</sup> The complex could double the amount of toxic air pollutants already released by surrounding industrial facilities in St. James Parish.<sup>234</sup> This includes dangerous chemicals like ethylene oxide,<sup>235</sup> exposure to which is linked to cancer, respiratory disease, reproductive impacts, and other health harms.<sup>236</sup>

The high levels of air pollution in Louisiana contribute to 85 cancer cases annually, per a study from Tulane University.<sup>237</sup> In St. John the Baptist Parish, the cancer risk from toxic emissions is more than seven times the national average, with the highest rates concentrated in Black communities.<sup>238</sup> Cancer risk in predominantly Black districts in St. James Parish is significantly higher, with rates up to 105 cases per million residents, compared to 60 to 75 cases per million in predominantly white districts.<sup>239</sup>

### Formosa Plastics' Polluting Record: Financed by Citi

Formosa Plastics has a long track record of polluting and endangering communities, including in the Gulf South. The company's Point Comfort plant in Texas is their largest U.S. plastics facility, manufacturing the materials used for straws, plastic bags, and pipes.<sup>278</sup> The plant also releases toxins into the surrounding air and water and has racked up safety violations, including in the years when Citi financed Formosa Plastics Group companies between 2001 and 2015:

#### 2005

An explosion at the Point Comfort plant injured at least a dozen workers.<sup>279</sup>

#### 2009

The EPA fined Formosa Plastics Corporation nearly \$13 million for air, water, and hazardous waste violations.<sup>280</sup>

#### 2013

Formosa Plastics is fined an additional \$1.5 million by the EPA for failing to install equipment required in the agency's 2009 settlement.<sup>281</sup>

#### 2013-2016

A series of fires, explosions, and hazardous releases at the plant hospitalizes multiple workers and prompts an Environmental Protection Agency investigation into Formosa Plastics.<sup>282</sup>

Diane Wilson, founder of the San Antonio Bay Estuarine Waterkeeper and Goldman Environmental Prize winner, has fought Formosa Plastics' pollution of her community for decades.<sup>283</sup> Wilson and the Lavignes have since joined forces, along with Justice for Formosa's Victims in Vietnam, to form the International Monitor Formosa Plastics Alliance and fight Formosa Plastics globally.<sup>284</sup>

**The cancer risk from toxic air pollution in St. James Parish is more than seven times the national average, with the highest rates concentrated in Black communities.**

Shamell describes the pervasive smell of pollution that permeates the area. **“You can smell the ammonia, you can smell the sulfur [from Mosaic]”** she explains, noting that the fumes keep people up at night. A “rotten egg” stench often fills the air, Lavigne reports, a complaint frequently echoed by other community members.<sup>240</sup>

Cancer isn’t the only health risk posed by heavy industry. Pregnant women in Louisiana’s most polluted areas, including St. James Parish, have a 36 percent higher risk of giving birth to low-weight babies and a 25 percent higher risk of premature births, according to one study.<sup>241</sup> These risks are particularly acute for Black and low-income women, who already face significant health disparities.<sup>242</sup>

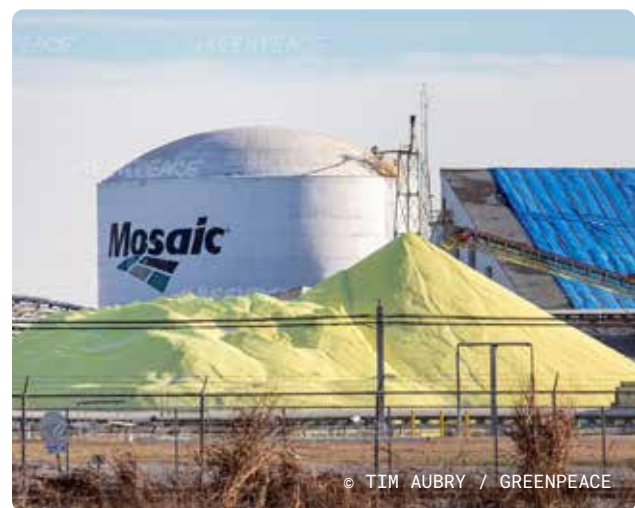
**Pregnant women in Louisiana’s most polluted areas, including St. James Parish, have a 36 percent higher risk of giving birth to low-weight babies and a 25 percent higher risk of premature births, according to one study.**

### **“No Regard For Our Lives”**

The industrialization of St. James Parish began in the 1960s with Agrico, now Mosaic, which built a fertilizer plant on land that once housed plantations, according to Lavigne. It is no coincidence that so many polluting companies set up shop in St. James. In fact, it’s a continuation of a legacy of racism that has defined the region’s history. Modern-day petrochemical plants like Mosaic are built directly on the footprints of the old plantations, according to Joy Banner, co-director of the Descendants Project.<sup>243</sup> United Nations

human rights experts have highlighted this legacy, emphasizing how the descendants of enslaved Black people have become the primary victims of the pollution created by these petrochemical plants.<sup>244</sup> One of the first refineries to industrialize the area turned two Black “freetown” communities, founded on former plantation land, into “fenceline” communities.<sup>245</sup> Formosa Plastics’ Sunshine Project continues this destructive legacy, as the facility’s proposed site contains the unmarked burial sites of formerly enslaved people.<sup>246</sup> Petrochemical and fossil fuel companies’ reappropriation of plantations was foundational in establishing what was the beginning of a new economic regime in the region. Much of the sugar cane fields and fertile farm lands have now been replaced by looming petrochemical plants, Lavigne reports, transforming the area into an industrial landscape, polluting Black communities and damaging the land for over half a century. Newer generations might never have known their home as anything other than a sacrifice zone.

**Modern-day petrochemical plants are built directly on the footprints of the old plantations, according to Joy Banner, co-director of the Descendants Project.**



MOSAIC’S FERTILIZER PLANT IS ANOTHER FORM OF PETROCHEMICAL INDUSTRY POLLUTING THE ST. JAMES COMMUNITY. JANUARY 17, 2024.

**“I feel like it’s the path of least resistance. Because if you have a community that’s, you know, mainly Black American, I think they feel like we’re not gonna say anything, we’re just gonna allow these harmful chemical plants to come in and build and continue to pollute us,”** Shamell emphasizes. **“It’s definitely a lack of regard for people just in general, but mainly Black Americans and Indigenous people.”**

Lavigne describes how community members have found it increasingly difficult to maintain gardens. “A lot of the pecan trees, they bear pecans every other year,” she notes, contrasting this with her childhood memories, when they bore fruit annually. Even when the pecans do bear, they often end up hollow, she reports. Residents of St. James Parish recall a time when they could rely on the fertile land for their livelihoods, with vegetable gardens, fruit trees, and clean air and water.<sup>247</sup> But it has since transformed into an industrialized landscape unrecognizable to the community elders. As Lavigne notes, the fig trees that were once prosperous have dried up and no longer bear fruit, forcing residents to cut them down.

**Residents of St. James Parish recall a time when they could rely on the fertile land for their livelihoods, with vegetable gardens, fruit trees, and clean air and water. But it has since transformed into an industrialized landscape unrecognizable to the community elders.**

Following a familiar playbook, corporate executives frequently promise jobs in order to justify the proliferation of these petrochemical plants in communities of color.<sup>248</sup> However, as Lavigne points out, these promises are rarely fulfilled. This is especially true for Black workers: a Tulane study found that in St. John the Baptist Parish in “Cancer

Alley,” people of color made up only 28% of the manufacturing jobs, despite representing 70% of the working-age population.<sup>249</sup> This was evident with Koch Methanol, which promised over 400 jobs but ended up employing only 115 people, with a majority living outside St. James Parish.<sup>250</sup> Lavigne says that plant owners often claim there is a lack of skilled local workers as a reason for not hiring locally. However, Lavigne remains skeptical, noting that these industries have been known to manipulate the narrative to justify their actions. Instead of economic benefit, local communities, and especially Black communities, are engulfed in pollution and poverty.

Not only does Southern Louisiana produce major climate pollution, it is also one of the world’s most climate-impacted regions.<sup>251</sup> Industrial facilities in Louisiana account for 66 percent of the state’s greenhouse gas emissions, which in turn exacerbate climate disasters and pollution events.<sup>252</sup> **“The hurricanes are coming in more intensely. They’re staying over land longer,”** Lavigne notes, describing how Hurricane Ida blew off the roof of her mother’s home in 2021. Hurricane Ida caused additional pollutant releases from industrial facilities onto nearby communities, including at least 229,633 gallons worth of oil spilled and 730 tons of air pollutants emitted.<sup>253</sup> These compounding climate and pollution impacts worsen the damage to local ecosystems and community health in Gulf communities like St. James.

**“We have people in St. James and St. John Parishes that still have blue tarps on their roof. [Climate change] is having a severe impact on us here. We pray every hurricane season that no hurricane comes because we know that it’s gonna come in more intensely and rapidly,”** Lavigne shares.

Hurricanes aren’t the only climate issue that St. James is facing. In 2023, President Biden issued a state of emergency declaration for the state of Louisiana due to a water-crisis caused by prolonged drought.<sup>254,255</sup> Residents couldn’t flush toilets, wash their hands, or use air conditioners amid record heat.<sup>256</sup> Meanwhile, amid this crisis, Plaquemines LNG, an export terminal on Louisiana’s coast, consumed a quarter of all water in Plaquemines Parish, while residents were urged to conserve as much water as possible.<sup>257</sup>





SHAMELL LAVIGNE ADDRESSES A CROWD AT A RISE ST. JAMES EVENT. PHOTO: COURTESY OF SHAMELL LAVIGNE

## Rising Against Racism & Pollution

Shamell first learned of the Sunshine Project through a local news alert, which showed the Louisiana governor endorsing the project and boasting of its potential economic benefits. “I immediately called my mom...and said, ‘Hey, you know, the governor just announced that they’re gonna build this plastics plant, and it’s gonna be really, really close to the house,’” she recalls. “[There are] twelve other industries within a 10 mile radius within St. James, and almost 200 petrochemical plants within Cancer Alley...it was just like, ‘Wow, how many more plants are y’all gonna put on us?’”

**“The governor just announced that they’re gonna build this plastics plant, and it’s gonna be really, really close to the house,” recalls Shamell Lavigne.**

Shamell describes Formosa Plastics’ community consultation on the Sunshine Project as insufficient to absent. She explains how Formosa Plastics instead attempted to pacify the community by donating bags of rice and beans during local events, but it felt like an insult compared to the real issues they faced. There was no meaningful dialogue or engagement to understand the community’s concerns, let alone address them. As Shamell bluntly put it, **“It was just really no regard for our lives, basically.”**

Alarmed by the proposed project’s proximity to a local elementary school, church, and her family’s home, Lavigne began to investigate Formosa Plastics’ track record, uncovering extensive violations of air and water permits. In one example, Formosa Plastics illegally dumped plastics waste into Lavaca Bay in Texas for years, devastating the ecosystem health of the bay<sup>258</sup> and the local fishing economy.<sup>259</sup> Shamell and her mother, Sharon Lavigne, founded RISE St. James to organize against Formosa Plastics’ proposed project and protect their community from environmental racism.<sup>260</sup>

**Alarmed by the proposed project's proximity to a local elementary school, church, and her family's home, Shamell began to investigate Formosa Plastics' track record, uncovering extensive violations of air and water permits.**

The struggle against Formosa Plastics is not RISE St. James' first effort to stop new petrochemical development in the area. In 2018, a Chinese company, Wanhua, proposed construction of a \$1.25 billion plastics manufacturing plant in St. James Parish.<sup>261</sup> After strong community mobilization, including attending public meetings and legal strategies, Wanhua withdrew its proposal for the plastics plant.<sup>262</sup> Sharon Lavigne was awarded the Goldman Environmental Prize (also known as the Green Nobel Prize) for her leadership in the environmental justice movement and campaign against Wanhua.<sup>263</sup>

In the case of Formosa Plastics, RISE St. James' advocacy led to a Louisiana court revoking the air permits Formosa Plastics needs to build the Sunshine Project in 2022, citing a failure to acknowledge the cumulative impact of additional air pollution and increased cancer risk.<sup>264</sup> However, the victory was brief: another court overturned this ruling earlier in 2024, and reinstated the Sunshine Project's air permits.<sup>265</sup> Meanwhile, the Sunshine Project has the public support of Louisiana Governor John Bel Edwards and St. James Parish President Timothy Roussel.<sup>266</sup>

Still, the Lavignes and their community remain steadfast in their fight. Formosa Plastics still needs to acquire a federal wetlands permit for the Sunshine Project before it can be built.<sup>267</sup> RISE St. James and other advocacy groups are pressuring the U.S. Army Corps of Engineers to deny Formosa Plastics' application for the permit, which is currently under review.<sup>268</sup> RISE St. James, Inclusive Louisiana, and Mount Triumph Baptist Church also filed a lawsuit against St. James Parish for environmental racism driving the disproportionate siting of industrial facilities in Black neighborhoods.<sup>269</sup> The lawsuit calls for a moratorium on any new polluting industry.<sup>270</sup>



RISE ST. JAMES MEMBERS MARCH TO END INDUSTRIAL DEVELOPMENT IN LOUISIANA'S "CANCER ALLEY."  
PHOTO: COURTESY OF SHAMELL LAVIGNE

## CASE STUDY SUNSHINE PROJECT

Yet, the only moratorium St. James Parish has enacted is one on new solar development.<sup>271</sup>

As a result of RISE St. James members' advocacy, the UN Committee on the Elimination of Racial Discrimination (CERD) called for an end to environmental racism in "Cancer Alley."<sup>272</sup> They further urged the U.S. government to provide reparations to descendants of enslaved people.<sup>273</sup> The demand for reparations is crucial to the fight against Formosa Plastics' Sunshine Project. The project's massive plot includes the former Acadia and Buena Vista Plantations, where burial sites of enslaved people have been discovered.<sup>274</sup>

**As a result of RISE St. James members' advocacy, the UN Committee on the Elimination of Racial Discrimination (CERD) called for an end to environmental racism in "Cancer Alley," and urged the U.S. government to provide reparations to descendants of enslaved people.**

Today, Sharon and Shamell Lavigne envision a vibrant, thriving St. James with clean air and water—and no industrial polluters. Sharon wants to see her community the way it was when she was growing up, before industrial development: when her family lived off the land, when the air was breathable and residents weren't constantly sick.<sup>275</sup> She wants reparations for the families who lost loved ones to illness brought on by living near pollution, and she wants the industries "shut down and moved away."<sup>276</sup> The Lavignes are also advocating for a shift to solar and other energy sources that won't be as harmful to the climate or environment. **"We need to definitely move away from our reliance on oil and gas,"** says Shamell.

**Sharon Lavigne wants to see her community the way it was when she was growing up, before industrial development: when her family lived off the land, when the air was breathable and residents weren't constantly sick.**

RISE St. James is also urging financiers like Citi to stay away from funding projects like Formosa Plastics.<sup>277</sup> To live up to its public promises on climate and racial justice, Citi must acknowledge the multiple environmental, economic, and health crises in St. James and end its financing for the petrochemical industry. Shamell's message to Citibank is unequivocal: **"If you're going to say that you want to stop environmental racism and address environmental justice concerns, start with just divesting [and] denouncing Formosa Plastics."**

**"If you're going to say that you want to stop environmental racism and address environmental justice concerns, start with just divesting, denouncing Formosa Plastics."**



# Conclusion

## CONCLUSION

Citi's claims that it is contributing to racial equity and climate action are contradicted by the data and case studies presented in this report. The included analyses illustrate the harmful effects of Citi's fossil fuel financing on the health and well-being of low-income Black, Brown, and Indigenous communities along the Gulf Coast, specifically in Texas and Louisiana. Case studies from affected communities underscore the human cost of living near these polluting facilities, Citi's role, and highlight the courage of community leaders fighting for accountability and change.

By financially supporting the companies and projects highlighted in this report, Citi is reinforcing systemic injustices in Gulf communities, such as the high concentration of polluting industries in Black, Brown, and low-income communities, threats to Indigenous sovereignty, and mounting climate impacts. This report shows a sample of the global harm that Citi is causing as the largest financier of fossil fuel expansion globally since 2016.

The analysis quantifies the impact on community health and the climate that could be associated with Citi's funding of four methane terminals—Cameron LNG, Corpus Christi LNG, Port Arthur LNG, and Sabine Pass LNG. Citi's financing for these LNG facilities is not a mere business transaction. As this report shows, through its financing for these projects the bank is supporting pollution-induced illness and even death in these communities and the broader region. If Citi funds the expansion plans for these LNG projects, that death toll would increase.

The report also looks at Citi's financing for Enbridge and Formosa Plastics Group, and the impacts projected from the proposed Rio Bravo Pipeline's Compressor Station and the Sunshine Project. The analysis reveals the massive hidden climate impact of Citi's funding for Enbridge when the full scope of greenhouse gas emissions from Enbridge's pipelines is accounted for. The bank also needs to commit not to finance Formosa Plastics or its proposed Sunshine Project, which would have a significant climate impact in addition to perpetuating environmental injustice. Both the Rio Bravo Pipeline and the Sunshine Project would exacerbate the health impacts already felt in their respective communities, as analysis from this report has illustrated.

Each year, Citi finances millions of dollars in health care costs, thousands of asthma attacks, dozens of missed school and work days, and millions of tons of climate pollution.



A CLIMATE ADVOCATE OUTSIDE OF CITI'S NEW YORK HEADQUARTERS DURING A PROTEST ORGANIZED BY FAITH LEADERS AS PART OF THE "SUMMER OF HEAT ON WALL STREET". JULY 30, 2024. PHOTO: LUIGI MORRIS / SUMMER OF HEAT

## CONCLUSION

Residents of the Rio Grande Valley, Port Arthur, St. James Parish, and many other Gulf communities are fighting against these threats to protect their health, heritage, and future. Despite what they're up against, local advocates are committed to organizing with their families and neighbors to realize their vision for thriving communities.

Citi's financing of fossil fuel projects in the Gulf is enabling these projects to proceed, undermining communities' efforts to build healthier neighborhoods while fueling the fossil fuel buildouts, climate disasters, and public health crises that threaten their well-being and survival.

To genuinely advance racial and climate justice, Citi must cease its financing of polluting fossil fuel and petrochemical projects, especially in the U.S. Gulf South, and redirect funds toward community-led, sustainable and equitable development. Only then can Citi truly begin to repair the damage it has caused and support the well-being and resilience of Gulf Coast communities. It is time for Citi to stand by its commitments to racial and climate justice and play a positive role in fostering a healthier, more sustainable future for the Rio Grande Valley, Port Arthur, and St. James Parish, and beyond.

### To rise to this challenge, Citi must:

#### 1

#### Cease Financing New and Expanding Fossil Fuel Projects

Citi must immediately stop financing new and expanding coal, oil, and gas projects, as well as any companies involved in expanding fossil fuels and petrochemicals. The continuation of such investments perpetuates environmental degradation, pollution, and climate change, disproportionately affecting Indigenous, Black, low-income, and communities of color.<sup>286</sup> These communities often bear the brunt of pollution and environmental hazards, resulting in severe health and economic consequences.

#### 2

#### Rapidly Phase-Out of Fossil Fuel Financing

Citi should rapidly phase out all fossil fuel financing and demonstrate year-on-year reductions aligned with minimizing climate harm and limiting global warming to well below 1.5°C. This phased approach must be transparent, with clear benchmarks to ensure accountability. The phasing out of fossil fuels is crucial to mitigating climate change and protecting vulnerable communities from further degradation.<sup>287</sup>



#### 3

#### Respect Indigenous Peoples' Rights

Clients of Citi must fully respect all rights of Indigenous Peoples, including the Indigenous Peoples' Right to Free, Prior, and Informed Consent (FPIC) as articulated in the UN Declaration on the Rights of Indigenous Peoples. This respect includes ensuring that any project or investment has the genuine consent of Indigenous communities and that their sovereignty and cultural heritage are preserved.<sup>288</sup>

**4**

**End Financing for Human Rights Violators**

Citi should end financing for any projects or companies that demonstrate a pattern of violating human rights and self-determination, especially for Indigenous, Black, low-income, and communities of color. These communities have historically faced systemic discrimination and neglect, and continued financing of harmful projects exacerbates these injustices.<sup>289</sup>

**5**

**Strengthen Exclusion Policies**

While phasing down fossil fuel financing, Citi must adopt or strengthen sectoral and regional exclusion policies, including for particularly harmful sectors and regions such as coal, liquefied natural gas (LNG), the Arctic, the Gulf South, and offshore/ultra-deep drilling projects. By implementing stringent exclusion policies, Citi can prevent further environmental damage and social inequities in these sensitive regions.

**6**

**Scale up investments in renewables and climate solutions**

Citi should scale up investments in renewables and proven climate energy solutions in line with a just transition and the needs outlined by the International Energy Agency. In 2023, Citi’s clean energy to fossil energy ratio was 0.58:1, when it should be at least 4:1.<sup>290</sup> Prioritizing renewable energy will not only mitigate climate change but also create sustainable economic opportunities for affected communities.



## CONCLUSION

### Frontline Visions for a Just Future

In addition to the demands above for Citi that were developed by the Fossil Free Citi campaign,<sup>285</sup> frontline leaders interviewed for this report including Sharon, Shamyra and Shamell Lavigne, Roishetta Ozane, John Beard Jr., Dr. Christopher Basaldú, and Juan Mancias, shared their transformative vision for climate justice and thriving communities. Their vision includes:

- **Polluters Must Pay:** Fossil fuel and petrochemical companies must pay for the harms they have caused, including environmental restoration of areas impacted by fossil fuel projects, cleaning up polluted sites and rehabilitating ecosystems. They must also pay reparations to families whose loved ones have died and suffered illnesses and other health harms due to pollution from nearby industry.
- **No Decisions About Us Without Us:** Fossil fuel companies and their financiers must give communities decision-making power when they are making deals and plans that affect their communities. They should also go visit the communities their decisions have already impacted to smell the air and drink the water that they have polluted.
- **Invest in Thriving Communities:** Polluters and banks must invest in building back sustainable, thriving communities, through healthcare, affordable housing, economic development, farmers markets, solar and wind farms, recreation centers, and more. Investments must be decided by members from each community.
- **Land Back:** Stolen land should be returned to Indigenous Peoples in North America, South America, and everywhere colonization and land theft has occurred or is occurring.
- **Transforming Our Political & Economic System:** Ultimately, we need to re-orient our profit-driven economic system that prioritizes wealth for few people at the expense of the needs of many, and a system in which politicians align with industry instead of the people they are supposed to represent.



GULF SOUTH ADVOCATES AND ALLIES PROTEST FINANCIAL INSTITUTIONS SUPPORTING FOSSIL FUEL DEVELOPMENT IN THEIR COMMUNITIES DURING THE "SUMMER OF HEAT ON WALL STREET." JUNE 26, 2024. PHOTO: TOBEN DILWORTH / RAINFOREST ACTION NETWORK





# Appendices

## Appendix 1: Glossary

- **Environmental Racism:** Any policy, practice or directive that differentially affects or disadvantages (where intended or unintended) individuals, groups or communities based on race.<sup>291</sup>
- **EPA's EJScreen:** The Environmental Justice Screening and Mapping Tool is a resource provided by the Environmental Protection Agency to combine environmental and socioeconomic indicators using a nationally consistent dataset.<sup>292</sup>
- **Fenceline Community:** A community that is located immediately adjacent to industrial facilities, such as refineries, factories, or chemical plants, and is directly impacted by the emissions, noise, and other pollutants from these operations.<sup>293</sup>
- **Sacrifice Zone:** An area that has been heavily industrialized and subjected to environmental degradation, often with high levels of pollution and health risks, deemed necessary to support economic activities. These zones are typically home to marginalized communities, and are named so because the health and wellbeing of these communities are being sacrificed so that others (i.e. fossil fuel companies) can profit.<sup>294</sup>
- **Gulf Coast/Gulf South:** A region in the United States that includes the coastal states bordering the Gulf of Mexico, such as Texas, Louisiana, Mississippi, Alabama, and Florida, known for its unique cultural heritage.<sup>295</sup> The region also has a significant concentration of oil and gas facilities.<sup>296</sup>
- **Cancer Alley:** Also known as “death alley,” this is an 85-mile stretch along the Mississippi River between Baton Rouge and New Orleans where around 200 petrochemical plants and refineries operate, resulting in high levels of pollution and elevated cancer rates among residents.<sup>297</sup>
- **Liquefied Methane Gas (LNG):** Methane gas, when cooled to -260 degrees Fahrenheit, becomes a liquid, known as liquefied “natural” gas (LNG).<sup>298</sup> It is liquefied for ease of storage and transport.<sup>299</sup> Methane is a potent greenhouse gas, significantly impacting climate change when released into the atmosphere.<sup>300</sup>
- **Petrochemicals:** Chemical products derived from petroleum and natural gas.<sup>301</sup> These chemicals are used as the building blocks for many products, including plastics, fertilizers, detergents, and synthetic fibers.<sup>302</sup>

## Appendix 2: Methodology

### Scope

The analysis includes the LNG export terminals in the U.S. Gulf South that Citi has directly financed, according to the Sierra Club's LNG Export Tracker as of May 2024: Cameron LNG, Corpus Christi LNG, Port Arthur LNG, and Sabine Pass LNG. The following phases of these terminals are included in scope, based on the LNG Export Tracker's indication of Citi financing:

- **Cameron LNG: Phase I**
- **Corpus Christi LNG: Stage I, II, and III**
- **Port Arthur LNG (not including the proposed expansion)**
- **Sabine Pass LNG: Phase I and II**

The above phases are all operational or under construction. None of the proposed expansion phases were included in scope.<sup>303</sup> However, Citi's financing for the companies behind the existing project phases could also be used to support the expansion phases.

The analysis also included Formosa Plastics Group and the Sunshine Project, as well as Enbridge and the Rio Bravo Pipeline. Citi's significant corporate financing for Enbridge means that it could be supporting development of the Rio Bravo Pipeline. For the purpose of this research, the Rio Bravo Compressor Station 1 is used to estimate health impacts related to the Rio Bravo Pipeline, but not the Rio Grande LNG Terminal to which the pipeline would supply methane gas. Meanwhile, projected climate and health impacts related to Formosa Plastics and its proposed Sunshine Project were also analyzed, as local advocates are calling on Citi to rule out financing for the facility.

### Financed Emissions

#### Data Sources: Bank Financing

The financing analysis is conducted at the project level and the corporate level, depending on whether Citi's financing has been general corporate purpose or direct financing related to the projects in scope. Financing includes loans, bonds, and share underwriting provided by Citi and other banks as indicated in the Banking on Climate Chaos 2024 database.<sup>304</sup>

For the four LNG terminals in scope, direct financing was identified using the Banking on Climate Chaos database via the following Special Purpose Vehicles: Cameron LNG LLC, Cheniere Corpus Christi Holdings LLC, Port Arthur LNG, and Sabine Pass Liquefaction LLC (see Table 2). For the purpose of this analysis, financing for Special Purpose Vehicles (subsidiaries created by parent companies) are treated as project-specific finance.

Direct financing has not yet been committed for the Sunshine Project or its operator FG LA LLC,<sup>305</sup> so Citi's financing was examined at the corporate level for the core constituent companies of the Formosa Plastics Group, the conglomerate to which FG LA LLC belongs.<sup>306</sup> Bank financing for Formosa Plastics Group from 2001 to 2015 was provided by Rainforest Action Network (RAN), which conducted analysis on data from a global financial database.

Project financing for the Rio Bravo Pipeline was not available, so corporate financing for Enbridge Inc. and its subsidiaries from 2016 to 2023 was analyzed via the Banking on Climate Chaos 2024 database.

## APPENDICES

### Data Sources: Greenhouse Gas Emissions

Greenhouse gas emissions for the respective projects and companies were obtained from the following sources:

#### LNG Export Terminals

The Sierra Club US LNG Export Tracker (as of May 2024) was used to source lifecycle annual emissions for the LNG export terminals in scope. Lifecycle emissions include emissions from upstream gas extraction through combusting the regasified LNG. The estimates are based on values from a Carnegie Mellon study on LNG lifecycle emissions, using the 20-year Global Warming Potential for methane.<sup>307</sup> The study finds that LNG’s lifecycle greenhouse gas emissions are allocated as follows: upstream (52.1%), liquefaction (5.4%), shipping (1.7%), regasification (0.9%), and end use combustion (40.4%). Sierra Club calculates emissions based on each LNG project’s stated peak capacity in billion cubic feet per day as reported by the company to FERC (where not reported to FERC, DOE or company stated capacities are used).

#### Enbridge

The company’s total 2023 emissions are sourced by adding Enbridge’s 2023 reported Scope 1-3 and methane emissions<sup>308</sup> with Investor for Paris Compliance’s third party estimate of Enbridge’s Scope 3 category 11 emissions, or the emissions related to the end use associated with its pipeline and transmission services, that the company does not currently disclose.<sup>309</sup>

TABLE 10: ENBRIDGE ESTIMATED GREENHOUSE GAS EMISSIONS

EMISSIONS CATEGORY	SOURCE	EMISSIONS AMOUNT (MMT CO2E) <sup>310</sup>
Scope 1	Enbridge	7.48
Scope 2	Enbridge	5.961
Scope 3 <sup>311</sup>	Enbridge	54.6341
Methane <sup>312</sup>	Enbridge	0.985
Scope 3 Category 11 (All Liquids)	Investors for Paris Compliance	428.7
Scope 3 Category 11 (Gas)	Investors for Paris Compliance	376.4
<b>TOTAL</b>		<b>874.16</b>

#### Formosa Plastics Group

Formosa Plastics’ 2022 greenhouse gas emissions are sourced from the company’s 2023 annual report.<sup>313</sup> Citi’s financing for Formosa Plastics was from 2001 to 2015, so financed emissions for Citi were not estimated.

### PCAF Methodology

To calculate the financed emissions for each project or company in scope, the principles behind the Principles for Carbon Accounting Financials (PCAF) Global GHG Standard for calculating financed emissions were used.

Financed emissions, as described by PCAF, are the absolute emissions that banks and investors enable through their loans and investments. Quantities are expressed in million metric tons of carbon dioxide equivalent (MMT CO2e).

## APPENDICES

The PCAF methodology works by calculating an attribution factor for the total project/company emissions. To calculate the financed emissions of each site, PCAF's financed emissions calculation<sup>314</sup> was used:

$$\text{Financed emissions} = \sum_i \text{Attribution factor}_i \times \text{Emissions}_i \quad (\text{with } i = \text{borrower or investee})$$

↓

$$\frac{\text{Outstanding amount}_i}{\text{Total equity} + \text{debt}_i}$$

For this analysis, the following formula was followed:

$$\text{Citi's Financed Emissions} = \frac{\text{Loans, bonds and share underwriting by Citi}}{\text{Total loans, bonds and share underwriting by all banks}} \times \text{Greenhouse Gas Emissions}$$

It is important to note that the financing data was taken over certain time periods for each project or company in scope. The financing amounts were annualized, then used to attribute annual greenhouse gas emissions data to Citi.

Furthermore, this calculation was used for all asset classes, as defined by PCAF. Project finance was identified as the relevant asset class for the four LNG terminals, given that financing for Special Purpose Vehicles could be assumed to be designated for a defined activity or set of activities related to these projects (as defined in PCAF's Global Standard). Where the use of proceeds was unknown, as in the case of corporate financing for Enbridge, "listed equity and corporate bonds" was the asset class chosen.

## Health Impacts

The data on health outcomes (premature mortality, health costs, etc.) related to permitted levels of air pollution from LNG export terminals is sourced from the report Permit To Kill<sup>317</sup> which uses the EPA's CO-Benefits Risk Assessment Health Impacts Screening and Mapping Tool (COBRA) model. The full methodology and scope of this analysis can be found in that report. Citi's responsibility for the health impacts related to each project terminal were estimated using the same attribution factor (i.e. Citi's percent of total bank financing for each project) that was used in calculating financed emissions, using the following formula:

$$\text{Total health impacts} \times \frac{\text{Financing by Citi}}{\text{Total bank financing}} = \text{Health impacts attributed to Citi}$$

The COBRA tool was used to estimate health impacts related to permitted air pollution emissions from the Rio Bravo Compressor Station 1 and Formosa Plastics' Sunshine Project. Toxic emissions of fine particulate matter (PM2.5), nitrous oxide (NOx), volatile organic compounds (VOC), and sulfur dioxide (SO2) that are allowed under their air permits for the Rio Bravo Compressor Station 1<sup>315</sup> and the Sunshine Project (i.e. FG LA Complex)<sup>316</sup> were accessed via Oil and Gas Watch. The data in Table 11 was input into COBRA to estimate annual health impacts related to these two projects, using a 2% discount rate. Selected health results are shown in Table 8.

## APPENDICES

TABLE 11: DATA INPUTS TO ESTIMATE HEALTH IMPACTS FROM AIR POLLUTION ASSOCIATED WITH THE PROPOSED RIO BRAVO COMPRESSOR STATION AND THE SUNSHINE PROJECT

PROJECT	COUNTY	SECTORS	PM2.5	NOX	VOC	SO2
Rio Bravo Compressor Station	Kleberg, Texas	Fuel Combustion: Industrial; Gas; Natural	28	191	24	21
Sunshine Project	St. James, Louisiana	Chemical & Allied Product Manufacturing; Polymer & Resin Manufacturing	340	1,243	1,668	83

The health outcomes estimated from air pollution if the Sunshine Project and Rio Bravo Pipeline are built were not attributed to Citi in this analysis due to the bank's financing being committed at the corporate level for Enbridge and Formosa Plastics Group, rather than direct project financing.

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# Credits

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