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To: [Office State Actuary, WA](#)
Subject: Comment to the July meeting of the Washington State Select Committee on Pension Policy
Date: Monday, July 7, 2025 9:02:43 AM
Attachments: [2025 July Comment to the Washington State Select Committee on Pension Policy.docx](#)

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Please find my comment to the Washington State select Committee on Pension Policy
Sincerely, Kristin Edmark, Battle Ground, Washington, concerned citizen

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Comment to the Washington State Select Committee on Pension Policy

Respectfully submitted by Kristin Edmark

2025 July

All information presented to you has been presented by me written and orally to WSIB. Concerned citizens have been attending WSIB meetings and providing information for more than a decade except during the pandemic.

Please provide WSIB guidance. Currently, numbers provided by WSIB regarding fossil fuel investments do not have value. Numbers based on criteria which exclude the end users of coal and which exclude the largest producers of coal should not be presented to legislators. Currently, only the biased opinions of the fossil fuel industry are presented to the WSIB with staff repeating those opinions.

WSIB has provided misleading/wrong information to lawmakers regarding the coal act

Last spring, a representative from WSIB told state legislators that the WSIB had only about \$120 million invested in coal September 2024 and that the coal investments were decreasing.

The criteria used by WSIB capture less than 1/20th of the amount of coal found through Stand.Earth funded professional analysis using the world-recognized Uregwald Global Coal Exit List. The Urgewald Global Coal exit List and the Carbon Underground listed are trusted world-wide and by organizations trusted by the public like Sierra Club.

MSCI used by WSIB finds \$120 **million** in WSIB coal investments 9/2024.

Global Coal exit List WSIB investments: over \$2.549 **Billion** 6/2024

WSIB does not count large diversified companies where coal production is a smaller amount of total revenue.

10 WSIB Invests in companies producing the most coal worldwide but WSIB does not count them as coal investments.

WSIB Investments from the WSIB website June 30 2024 on the Global Coal exit List:

Glencore	over \$186.4 million	-> world 10 th largest thermal coal producer
Pacificorps	over \$180.7 million	-> 22 coal-fired plants; 56% from coal, mines coal
Adani	over \$168 million	-> world 6 th largest coal plant developer, mines coal
Burlington North Santa Fe	over \$ 139 million	
Duke Energy	over \$128.6 million	
Mitsubishi	over \$127.4 million	
American Electric Power	over \$122.7 million	
CSX	over \$104.2 million	
Colbun SA	over \$93.8 million	
BHP Group	<u>over \$ 92.6 million</u>	-> one of the world's largest coal producers
	\$1,176.1 million	in just 10 WSIB coal investments

Why is WSIB investing anything in the companies which produce the most coal in the world? For example, Wikipedia lists the largest coal companies in the world as

	WSIB 6/2022	WSIB 6/2024
BHP Group	\$46,299,033	\$139,281,246
Rio Tinto	\$168,840,103	\$246,709,843
China Shenhua	\$38,056,185	\$62,359,078
Anglo American PLC	\$49,923,930	\$44,736,104
Coal India	\$21,422	\$15,257,706
NTPC	\$ 22,581,261	\$ 22,131,683
Sasol	\$1,401,426	\$ 40,956
Shaanxi Coal & Chemical	\$17,166,150	\$19,297,955
Teck	\$4,432,827	not found
CEZ group	<u>\$1,025,003</u>	<u>\$83,491</u>
	\$ 349,747,340	\$549,898,062

No decrease in investment in largest coal producers

The largest end users of coal world-wide are coal fired power plants; utilities are not counted by WSIB as coal investments. People in Washington state consider the shuttered Centralia coal-fired power plant to be a coal facility. End users should support the burning and continued use of coal and should be counted.

Washington has not decreased investment in fossil fuel recently.

Third Rail Economies/Stand.Earth has compared Washington investments to the Urgewald Coal Exit List as well as other recognized standards to identify fossil fuel investments.

<https://climatesafepensions.org/quiet-culprits-report/> Their analysis shows

Production/Support/Fossil utilities/more fossil fuels 6/30/2022: \$8,197,018,963

WSIB	6/30/2020	6/30/2021	6/30/2022
Production	\$1,448,384,065 1.0%	\$1,868,956,683 1.1%	\$2,286,350,863 1.31%
Support	\$1,196,241,916 0.8%	\$1,053,171,345 0.6%	\$1,062,747,940 0.61%
Fossil fuel Utilities	\$2,804,530,521 2.0%	\$2,694,906,407 1.6%	\$2,437,677,611 1.40%
More fossil fuels	\$2,107,640,283 1.5%	\$2,473,859,105 1.4%	\$2,410,242,549 1.39%

No significant decrease in WSIB investment in the Global Coal Exit List:

6/30/2022: \$2,683,426,539

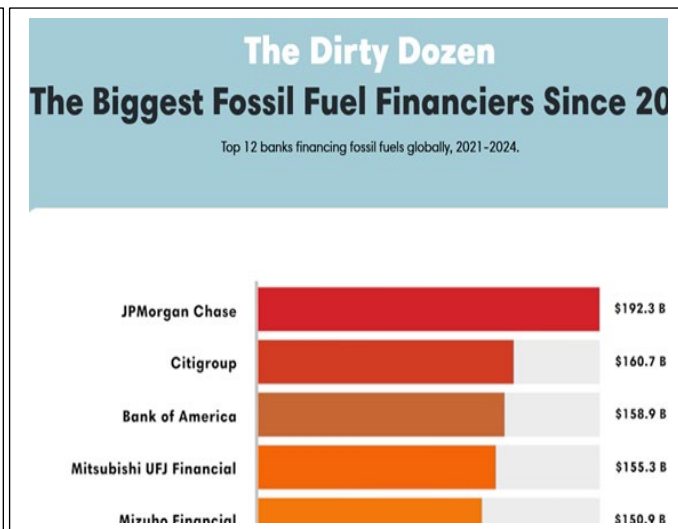
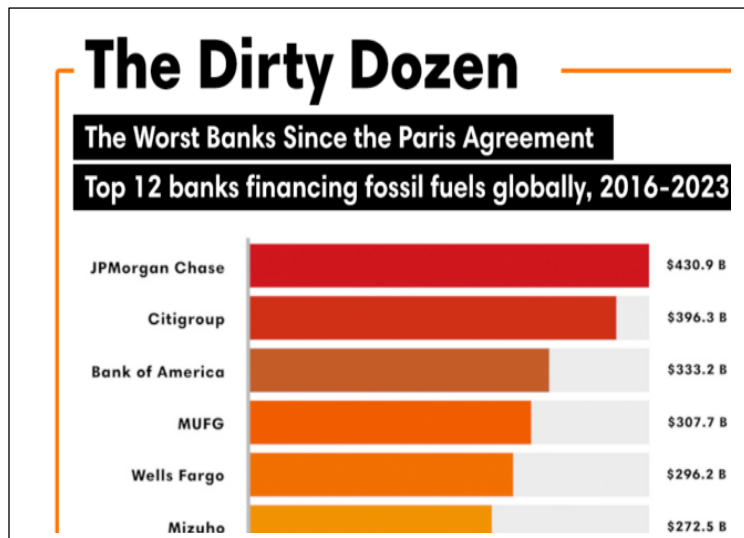
6/30/2024: \$2,549,716,646

WSIB is providing biased information to board members regarding fossil fuel investments

June 2025 WSIB meeting there was a presentation by Michael Cembalest from JP Morgan Chase on the Energy Transition. Of course, he stressed the need for more LNG pipelines and power plants and stated that wind, hydro and solar will not be able to provide the necessary energy. Many disagree with his view points. Chase continues to be the largest funder of fossil fuels worldwide since the Paris Climate agreement funding projects like the Mountain Valley Pipeline which has been halted by community outcry and funding the controversial Verde Island passage in the Philippines which devastates sea life and the communities which depend on it.

JP Morgan Chase 2016-2023: 439.9 Billion
Billion

JP Morgan Chase 2021-2024: 192.3



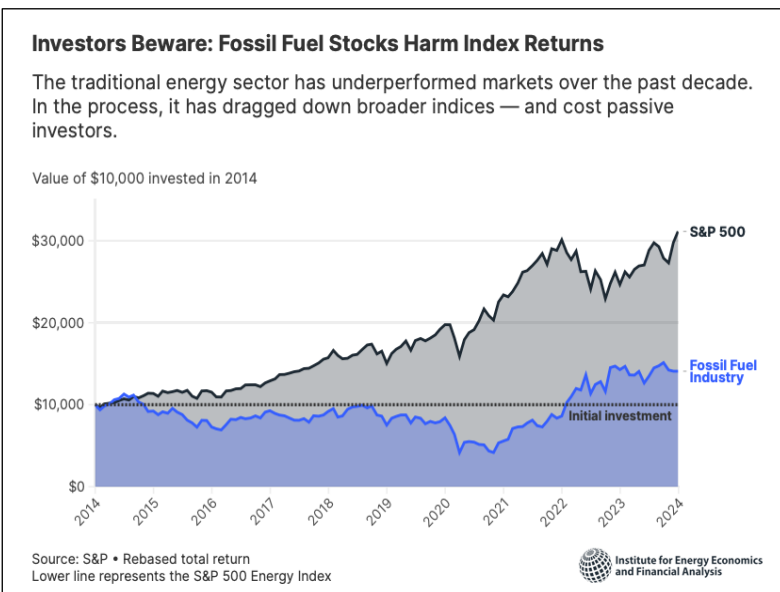
<https://www.bankingonclimatechaos.org/?bank=JPMorgan%20Chase#fulldata-panel>

June 2025 General Petraeus from KKR presented on international investing. His presentation was on world politics and not on fossil fuels; however, he represents KKR which has large holdings in controversial pipelines and fossil fuel infrastructure including those with human rights abuses. KKR created Spur Energy which is highly protested. In 2022 and 2023 Spur had at least 31 oil spills, 11 considered major. The potent greenhouse gas, methane is routinely released directly into the atmosphere and Spur continues to be fined for illegal flaring. The combined 2023 emissions of Spur Energy's oil and gas assets is an estimated 5.2 million metric tons of CO₂e. <https://pestakeholder.org/news/kkr-owned-spur-energy-pollutes-new-mexico-communities/> 2/15/2024. Protests against the Coastal Gaslink Pipeline have cost owners including KKR. The original cost of \$6.6 Billion to build the pipeline is now over \$14.5 Billion. The sacred headwaters have been bulldozed; tribal lands divided; areas are treated with herbicide. Amnesty International is now involved due to military tactics now deployed against protestors. Watch <https://www.youtube.com/watch?v=a9VDJmOPvIE>.

Fall 2024 Meetings regarding fossil free index funds were prevented between WSIB staff and IEEFA Institute for Energy Economics and Financial Analysis.

July 2024 large promoters of fossil fuels were asked to give presentations to WSIB including David Rubenstein and Meg Starr from Carlyle, Abebayo Ogunlesi founder of Global Infrastructure Partners, Larry Fink co-founder Blackrock, and Henry McVey CEO KKR. **WSIB CEO and staff repeated points** made by private equity speakers; specifically, both stated 1) the need for continued use of fossil fuels, 2) it is wrong to judge a company by its emissions and 3) investing in a company with a very large emissions can be better for the environment because influencing that company to be more sustainable could produce more benefit like WSIB investment in NTCP Limited. (note: NTCP increased coal production in 2024)

Evidence is clear that large pensions earn less when invested in fossil fuels.



<https://ieefa.org/articles/financial-rationale-investing-fossil-fuel-industry-continues-unravel>

The percentage of fossil fuel energy companies in the S&P 500 has fallen from 29% in the 1980s to now only 5%.

<https://ieefa.org/resources/two-economies-collide-competition-conflict-and-financial-case-fossil-fuel-divestment>

Studies showing decreased earnings by retaining fossil fuel investments:

2023 A University of Waterloo study shows 6 large pension public equity portfolios averaged 13% lower profits over 10 years than they would have had they not retained fossil fuel investments. https://uwaterloo.ca/school-environment-enterprise-development/sites/default/files/uploads/documents/the-impact-of-energy-investments-on-the-financial-value-and-the-carbon-footprint-of-pension-funds_pdf_final-version.pdf

2021 Maryland State Retirement and Pension System (SRPS), would have made 15% more in last 10 years if they had not had their investments in the Carbon Underground 200. Investments are similar to Washington. https://chesapeakeclimate.org/wp-content/uploads/2022/02/FFI_Solutions_Backtest_MD-MSRPS-2021.pdf

2021 Finance Climate Maps prepared by Ortec Finance for Oregon show much lower returns in the Failed Transition Pathway. Ortec suggests “integrating climate into your investment process”. https://irp.cdn-website.com/21c0cb7e/files/uploaded/Climate_MAPS_OPERF_Report_Oct2021_Redacted.pdf

2021 BlackRock report for New York City’s Comptroller and pension funds found that divestment “outperforms all other options.” And that fossil fuel stocks “consistently underperformed the broader market over the past five years.” According to Blackrock the costs to divest were negligible and can be done within normal activities. <https://ieefa.org/articles/new-york-city-comptroller-urges-blackrock-drop-fossil-holdings>

2019 CalSTRS would have gained \$11.9 billion and CalPERS would have gained \$5.5 billion had they been invested in other than oil/gas production in the 10 years between 2009 and 2019. <https://fossilfreeca.org/calpers-corporate-knight-report/>

Please provide guidance to the WSIB. WSIB should not provide information to legislators which is so narrow that it is misleading or just wrong. Presentations to WSIB members should not be exclusively by the largest promoters of fossil fuel investments.

Please promote SB 5439 The Coal Act