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October 10, 2025

Dear Mr Jacob,

We are writing to seek official AMF clarification regarding so-called “thought leadership” or “thematic research” pieces (hereafter referred to as “thought pieces”) issued by publicly listed companies in Quebec. The examples we are bringing forward pertain to National Bank and Royal Bank of Canada, both listed in Quebec, but the matter raised is a broader one that requires attention by both the AMF and other securities regulators.

In sum, here is the question we seek AMF’s answer to: **what is the legal status of so-called thought pieces in relation to securities law, and are they subject to the same standards of accurate and complete disclosure as other marketing materials?**

While publications are sometimes framed as neutral thought pieces and reported as such by the media, we believe that they should be considered marketing materials. The CSA has clarified that in cases where marketing materials contain ESG claims, such claims are subject to standards of accurate and complete disclosure when material.¹

This is a critical issue because such pieces can take positions on the desirability of specific kinds of economic activity, thereby influencing investment decisions. This is particularly pertinent where the authors have considerable financial interest in the given sector.

The examples we cite here relate to alleged greenwashing and overly promotional communications regarding liquefied natural gas (LNG). Greenwashing is an issue that the CSA has repeatedly expressed concern about, indicating that it is within scope of securities law.² This is confirmed by a recent greenwashing enforcement proceeding initiated by the Ontario Securities

¹ See for instance, in the context of investment funds: Staff Notice 81-334 *ESG-Related Investment Fund Disclosure*.

² For example, in Staff Notice 51-365, the CSA noted that it has observed an increase in recent years in issuers making potentially misleading, unsubstantiated or otherwise incomplete claims about sustainability, and reminded issuers that they “must have a reasonable basis” for ESG related disclosures and forward-looking information.

Commission.^{3,4} The AMF also set expectations regarding climate-related claims in its 2025 *Climate Risk Management Guideline*.

Here are the specific examples:

1. On February 22, 2024, National Bank Financial Markets (official name National Bank Financial, or NBF - a subsidiary of National Bank of Canada) put out a “thematic research” document titled “Canada Has a Vital Role in Deleveraging the Global Environmental Balance Sheet,”⁵ followed the next day by another document titled “World Watch.”⁶
2. On June 12, 2025, Royal Bank of Canada (RBC) published a “thought leadership” piece on its website titled “A G7+ Strategy for Natural Gas: Four Scenarios for Energy Security in the 2040s.”⁷ It also published a similar piece in 2023, titled “Canada’s Conundrum: Three Ways To Address The World’s Gas & Climate Crises.”⁸

In the Appendix to this letter, we lay out in detail how these documents appear to contain potentially inaccurate, incomplete, or overly promotional disclosures. The question here is whether that is consistent with securities law, meriting intervention by the AMF.

For its part, NBF states that its “report is not considered a research product under Canadian law,” and “is a marketing document” (for UK residents). RBC states that its 2025 report “may contain forward-looking statements within the meaning of certain securities laws, which are subject to RBC’s caution regarding forward-looking statements.” It is unclear to us what impact these fine-print disclaimers issued by the authors have on their obligations.

We note that both companies have a financial interest in promoting LNG development, which bolsters the case for these documents being considered marketing materials. National provided US\$1.2 billion of financing to LNG expansion between 2021 and 2023,⁹ which includes US\$648 million to Venture Global LNG, US\$299 million to NextDecade Corporation, and US\$200 million

³ [Ontario Securities Commission and Purpose Investments Inc. and Som Seif](#), (Sept. 2025).

⁴ Lawson Lundell LLP, [Securities Regulation: Another New Frontier for Greenwashing Claims in Canada?](#), Insight (Sept. 2025).

⁵ National Bank of Canada Financial Markets, [Canada Has a Vital Role in Deleveraging the Global Environmental Balance Sheet](#), NBCFM Research (Feb. 2024).

⁶ National Bank of Canada Financial Markets, [World Watch](#), Hot Charts, Vol. XXIV, No. 7 (Feb. 2024).

⁷ Royal Bank of Canada, [A G7+ Strategy for Natural Gas: Four Scenarios for Energy Security in the 2040s](#), RBC Thought Leadership (June 2025).

⁸ Royal Bank of Canada, [Canada’s Conundrum: Three Ways to Address the World’s Gas & Climate Crises](#), Energy Reports (Apr. 2023).

⁹ Reclaim Finance and Greenpeace, [Frozen gas, boiling planet: How Canadian financial support for LNG is fueling a climate disaster](#) (Dec. 2024) at 10.

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to Port Arthur LNG.¹⁰ In 2023, the bank multiplied its financing of LNG expansion by over 100 compared to 2022, with 16 transactions, more than twice as much as in 2022.¹¹

RBC, which is among the top 20 global supporters of LNG expansion, provided US\$6.1 billion in LNG financing between 2021 and 2023. It completed 51 transactions with LNG developers in 2023 alone, increasing its LNG financing by 164% between 2021 and 2023.¹² In addition, both banks have engaged in the facilitation of financing for Canadian gas projects which may tie into LNG facilities, with both serving as bookrunners in the financing of Coastal GasLink, for example.¹³

We therefore seek an official clarification from the AMF as to the legal status of thought pieces and their relation to securities law. Without this, there is a risk of investor-related greenwashing under the guise of seemingly neutral analysis.

We look forward to your timely response.

Yours sincerely,



Matt Price
Executive Director

Cc Matthew Boswell, Commissioner of Competition, Competition Bureau Canada
Canadian Securities Administrators
Canadian Investment Regulatory Organization
Laurent Ferreira, President and CEO, National Bank of Canada
David I. McKay, President and CEO, Royal Bank of Canada

¹⁰ Data courtesy of Reclaim Finance.

¹¹ Reclaim Finance and Greenpeace, *op. cit.*, at 15 & 16.

¹² *Ibid.*, at 10.

¹³ CBonds, New issues: [Coastal GasLink Pipeline released bonds \(CA19046FAP77, CA19046FAQ50\) in the amount of CAD 600, CAD 575 mln maturing in 2034, 2036 respectively](#) (Jun. 2024).

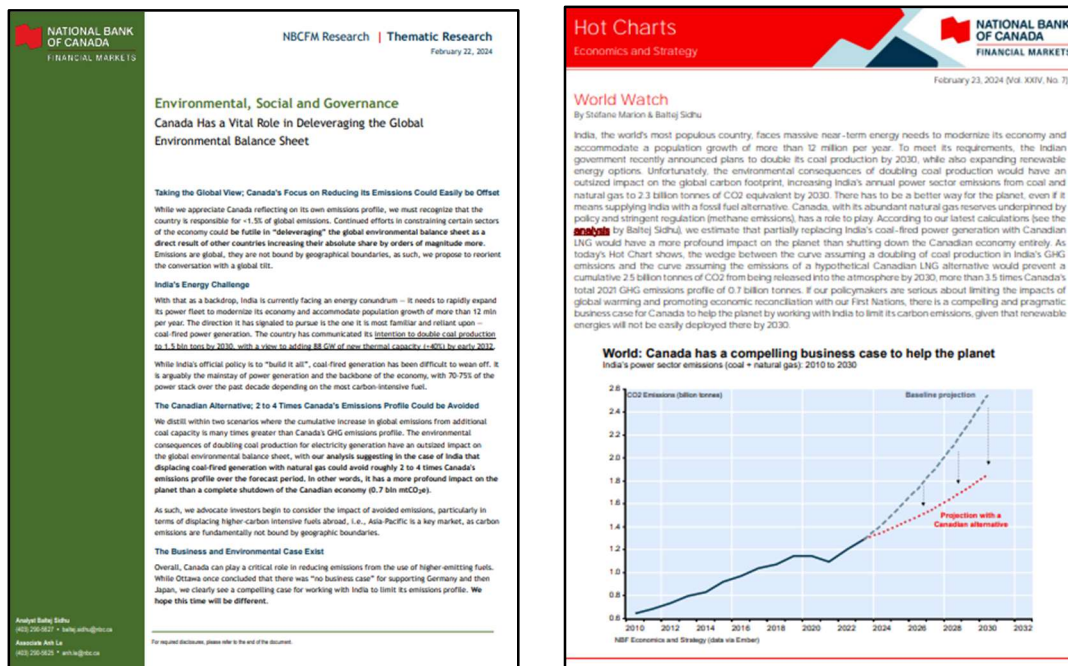
Appendix: Analysis of National Bank of Canada Financial Markets and Royal Bank of Canada's Publications on Liquefied Natural Gas

1. Description of the publications

1.1. National Bank of Canada Financial Markets Publications: *Hot Charts* (2024) and *Canada Has a Role in Deleveraging the Global Environmental Balance* (2024)

On February 22, 2024, National Bank of Canada Financial Markets (NBCFM) put out a document titled “Canada Has a Vital Role in Deleveraging the Global Environmental Balance Sheet,”¹⁴ followed the next day by another document titled “World Watch.”¹⁵

Figure 1. NBCFM publications on the alleged environmental benefits of LNG



Source: NBCFM

NBCFM's pieces argue that India's planned coal expansion presents an opportunity for Canada to significantly expand its gas production and LNG exports to displace Indian coal consumption, thereby driving down global emissions. It states that natural gas has "50%-60%" lower emissions

¹⁴ National Bank of Canada Financial Markets, [Canada Has a Vital Role in Deleveraging the Global Environmental Balance Sheet](#), NBCFM Research (Feb. 2024).

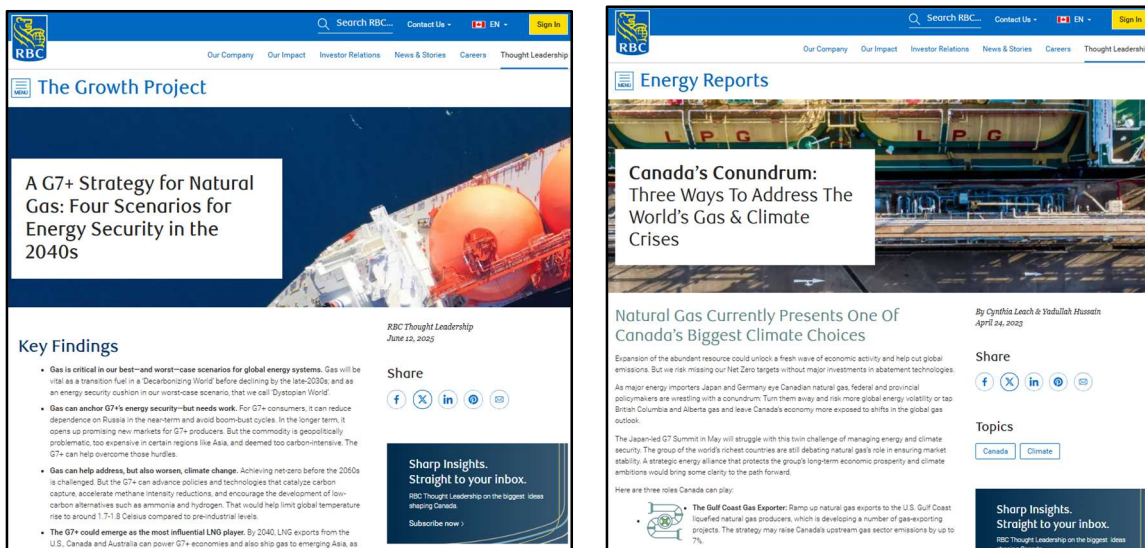
¹⁵ National Bank of Canada Financial Markets, [World Watch](#), Hot Charts, Vol. XXIV, No. 7 (Feb. 2024).

than coal in power generation, and that if Canada targeted India as a gas export market, it could drive emissions reductions amounting to 3.5 times Canada's annual global emissions by 2030.

1.2. Royal Bank of Canada Publications: *A G7+ Strategy for Natural Gas (2025)* and *Canada's Conundrum: Three Ways To Address The World's Gas & Climate Crises (2023)*

On June 12, 2025, Royal Bank of Canada (RBC) published a thought leadership piece on its website titled "A G7+ Strategy for Natural Gas: Four Scenarios for Energy Security in the 2040s."¹⁶ It also published a piece in 2023, titled "Canada's Conundrum: Three Ways To Address The World's Gas & Climate Crises."¹⁷

Figure 2. RBC publications on the alleged environmental benefits of LNG



Source: RBC

Both RBC pieces present scenarios in which LNG could serve as tools for climate action. While the first one focuses on the potential roles of Canada as a gas exporter, the latter argues that G7 nations more broadly should incentivize gas expansion. Both reports rest upon similar assumptions as NBCFM's publication, that gas and LNG are relatively low-emitting fuels relative to coal, and that Canadian gas could effectively target nations with high-emitting power generation. They also suggest that better abatement technology means that Canada could produce relatively low-emitting LNG.

¹⁶ Royal Bank of Canada, [A G7+ Strategy for Natural Gas: Four Scenarios for Energy Security in the 2040s](#), RBC Thought Leadership (June 2025).

¹⁷ Royal Bank of Canada, [Canada's Conundrum: Three Ways to Address the World's Gas & Climate Crises](#), Energy Reports (Apr. 2023).

Given those assumptions, both pieces make explicit calls for legislation which would advance Canada's LNG exports, including the expedition of major project approvals alongside decarbonization targets for the upstream portion of gas and LNG's lifecycle.

Across the two reports, RBC makes a number of statements suggesting that Canada could produce low-emissions gas to reduce power sector emissions, such as:

- "[Canada could] carve a niche in global LNG markets as a strategic supplier of stable, low-emissions gas," and
- "Canada's world-leading methane regulations, naturally low formation CO₂ in the Montney, and promise of clean electricity supply is prized by global producers eager to reduce their greenhouse gas emissions."

2. Issues with the publications

The thought leadership pieces published by NBCFM and RBC present significant issues that include: a lack of consideration of the economic challenges to coal-to-gas substitution, unsourced emissions coefficients which raise questions as to actual emissions reduction opportunities, use of potentially overly promotional messaging, and a lack of a clear statement of each banks' financial interests in LNG development.

2.1. None of the pieces disclose the challenging economics of coal-to-LNG substitution

The IEA has found that for LNG to compete with coal, it needs prices lower than US\$3-5/MmBtu.¹⁸ The breakeven costs on Canadian LNG projects have consistently and significantly overran the upper limit of that pricing threshold.¹⁹ As such, the ability for Canadian LNG to displace coal use is economically dubious, whether in India or elsewhere in the world.

The Institute for Energy Economics and Financial Analysis (IEEFA) notes that "exporters claim Canadian LNG will replace coal in Asia, but evidence from the largest coal-consuming countries suggests otherwise," concluding that new gas imports would likely just increase overall fossil fuel consumption.²⁰

Neither NBCFM nor RBC acknowledges this economic barrier to LNG-for-coal substitution, which is a major oversight. Readers may therefore be left with a misleading impression regarding the real-world practicality of substitution, and the resulting sense that new Canadian LNG is good for the climate.

¹⁸ IEA, [2024 World Energy Outlook](#), at 52.

¹⁹ Investors for Paris Compliance, [Late to the Party](#), (Dec. 2024) at 10.

²⁰ IEEFA, [Canadian LNG will not boost Japan's Energy Security or Asia's decarbonization](#) (Oct. 2024).

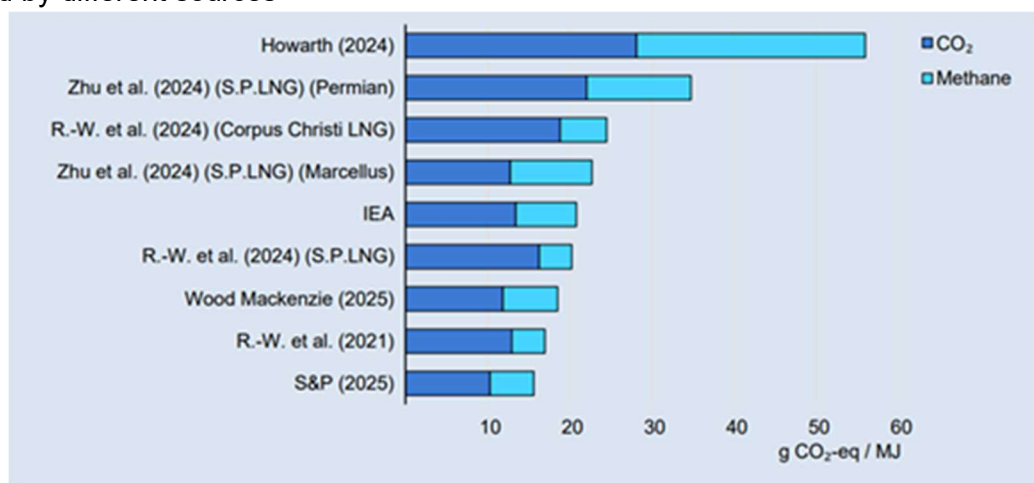
Moreover, NBCFM's pieces and projections are entirely contingent upon systemic coal-to-LNG switching, and for that switching to specifically occur in India. They fail to note that Canadian gas expansion would in practice have supply impacts on the broader market, including regions that would use new gas for *new* power supply. The same principle applies to RBC's 2025 piece, in which it repeatedly notes the emissions reduction potential of coal-to-LNG switching without noting the repercussions of a greater abundance of gas in the global market.

Finally, Clean Energy Canada notes that the financing of LNG can delay investments into renewable power.²¹ Repeated studies have found that the introduction of new gas into the global market competes directly with, and delays the deployment of, renewable power expansion.^{22,23}

2.2. None of the pieces acknowledge the range of life-cycle emissions calculations, omitting emissions coefficients

There is a significant range of lifecycle emissions estimates for LNG. While most research suggests that LNG is somewhat less emitting than coal on a lifecycle basis, the scale of savings is subject to significant uncertainty. The following figure by the International Energy Agency shows various estimates of production and transportation emissions from LNG. Combustion emissions are similar across gas sources.

Figure 3. Emissions from producing and transporting LNG from the United States to Europe reported by different sources



Source: IEA, [Assessing Emissions from LNG Supply and Abatement Options](#), (2025) at 7.

²¹ Clean Energy Canada, [An Uncertain Future](#), (2024) at 2.

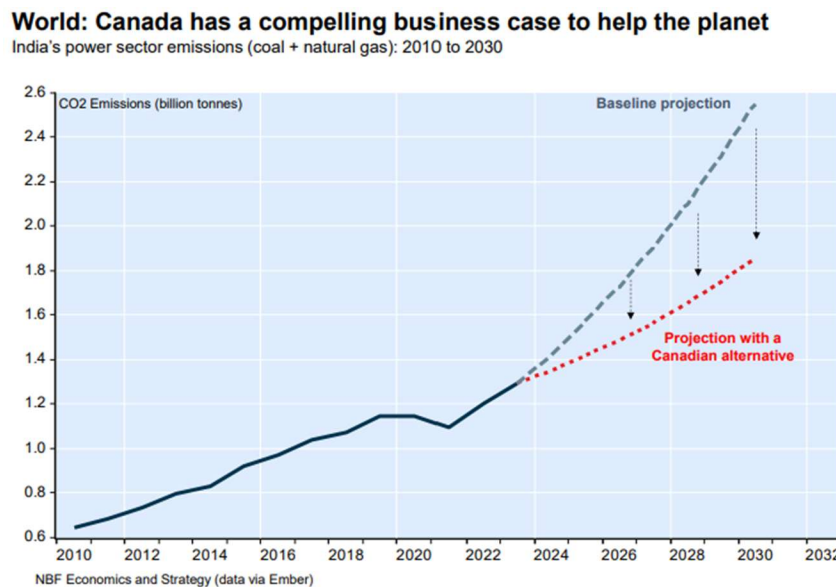
²² IOP Science, [The effect of natural gas supply on US renewable energy and CO2 emissions](#) (2014).

²³ Quebec Public Hearings Bureau on the Environment, [Project to build a natural gas liquefaction complex in Saguenay](#), (2021) at x.

NBCFM's publications state that switching India's coal expansion plans to LNG could reduce India's power sector emissions from over 2.5 billion tons annually to just over 1.8 by 2030. That represents an emissions reduction potential of coal to LNG of over 28%.²⁴

NBCFM does not publish the emissions coefficients used to create these models. That study falls among the most favorable estimates of LNG emissions. The Clean Air Task Force, for example, found a GHG impact ranging from a 40% reduction, to a 20% *increase* in emissions.²⁵ The IEA found significant variations depending on the source of LNG,²⁶ as the emissions reduction potential of coal-to-LNG substitution is highly dependent upon leakage rates of which we are not certain.²⁷ Neither NBCFM publication specifies whether the emissions estimated are emissions from combustion, or from total lifecycle emissions.

Figure 4. NBCFM's estimated emissions savings from coal-to-LNG switching in India's power sector



Source: National Bank of Canada Financial Markets, [Hot Charts: World Watch](#), 2024.

Furthermore, NBCFM's publication asserts that Canada produces low-emitting gas. While it does note that flaring is an issue, it suggests that Canada's environmental policy – both existing and potential – means that Canada is well positioned to supply low-emitting gas. Yet, NBCFM fails to

²⁴ NBCFM's memo offers no specifics regarding the breakdown of emissions within India's power sector by type. As such, 28% is a low-end estimate which assumes that 100% of India's high-projection emissions between 2024 and 2030 are from coal-based power production.

²⁵ Clean Air Task Force, [Analysis of Lifecycle Greenhouse Gas Emissions of Natural Gas and Coal Powered Electricity](#) (Mar. 2024).

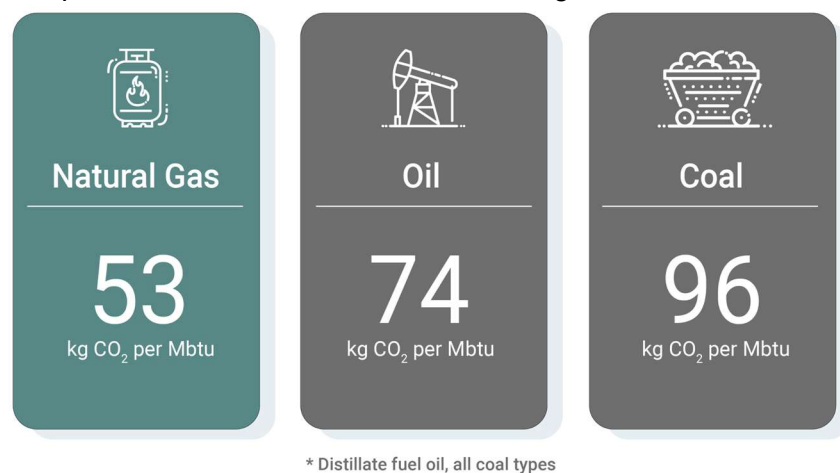
²⁶ International Energy Agency, [New IEA report assesses emissions from LNG supply and maps out opportunities to reduce them](#) (Jun. 2025).

²⁷ Gordon et al., [Evaluating net life-cycle greenhouse gas emissions intensities from gas and coal at varying methane leakage rates](#) (2023).

note Canada's oil and gas sector's ongoing underestimation of its methane emissions. A 2023 study found that Canadian methane emissions rates from its oil and gas sector were 50% higher than reported.²⁸

RBC's 2023 publication likewise chooses rosy emissions assessments for LNG. It contains a graphic (below) titled *Natural Gas is a cleaner-burning fossil fuel*, which shows gas being lower-emitting per unit of energy. Yet, this does not account for lifecycle impacts which make up a significant proportion of LNG's emissions, solely representing the emissions coefficient at point of combustion.²⁹

Figure 5. RBC's depiction of carbon intensities of natural gas, oil and coal



Source: RBC, [Canada's Conundrum: Three Ways to Address the World's Gas and Climate Crises](#) (2023).

RBC then presumably extrapolates based on these incomplete numbers – readers are not given access to the assumptions – and again fails to note the economic substitution challenge to arrive at a chart that alleges global emissions reductions as Canada expands its gas exports.

Furthermore, RBC's 2023 report asserts the alignment of gas expansion with broad societal decarbonization, making statements such as Canada being able to “reduce net global emissions by as much as 211 MtCO₂e” via gas expansion (see figure below).

²⁸ Communication Earth & Environment, [A measurement-based upstream oil and gas methane inventory for Alberta, Canada reveals higher emissions and different sources than official estimates](#) (Nov. 2023).

²⁹ The figure of 53 kg CO₂ per Mbtu for natural gas is generally found to cover combustion emissions only. See: Energy Information Administration, [Analysis of Carbon Fee Runs Using the Annual Energy Outlook](#) (2021).

Figure 6. RBC's three energy scenarios and related climate and economy characteristics

2030 ILLUSTRATIVE		Current Gas Sector*	Pathway #1 Gulf Coast Exporter	Pathway #2 The Strategic Supplier	Pathway #3 West Coast Gas Hub
New LNG capacity	14 MTPA by mid-decade		-	+ 40 MTPA	+ 80 MTPA
Total gas production	21.0 bcf/day		+ 1.0 bcf/day	+ 4.8 bcf/day	+ 9.7 bcf/day
CLIMATE					
Global net emissions	36.8 GtCO ₂ e		-	- 105 MtCO ₂ e	- 211 MtCO ₂ e
Canada emissions	50 MtCO ₂ e (2030 Target ~29)		+ 3.4 MtCO ₂ e	+ 16.6 MtCO ₂ e	+ 33.2 MtCO ₂ e
ECONOMY					
Investment (over 40 years)	\$21 B/year		+\$10 B	+\$133 B	+\$236 B

MTPA = megatonnes per annum
bcf/day = billion cubic feet per day
B= billion
MtCO₂e (GtCO₂e)= million of tonnes (billions of tonnes) of carbon dioxide equivalent

Source: RBC, [Canada's Conundrum: Three Ways to Address the World's Gas and Climate Crises](#) (2023).

RBC's 2025 report offers even less detail regarding emissions assumptions. Despite repeatedly making specific claims regarding the emissions reduction potential of its various gas expansion scenarios, it provides no underlying lifecycle emissions estimate to substantiate those claims. While it states at times that comprehensive methane measurement would support decarbonization of the gas supply chain, it still underpins its specific emissions projections on undisclosed emissions coefficients.

Even under the most ambitious model used in the 2025 RBC report, it suggests that decarbonization would largely occur via carbon capture, as opposed to a systemic shift away from fossil fuels. It calls gas "vital as a transition fuel in a 'Decarbonizing World'." Its "democratic gas world" scenario claims that significant gas expansion – about 70% between 2024 and 2048 – is compatible with the "energy transition," while offering no definition of that term and underlying assumptions. In contrast, the IEA's net zero roadmap notes no need for additional investment in gas, resulting in an 18% drop in demand for gas by 2030, and 78% by 2050.³⁰

³⁰ IEA, [Net Zero Roadmap](#), (2023) at 16.

2.3. The publications use questionable language to describe LNG

Based on the shortcomings outlined in the above sections, it is perhaps not surprising that the publications proceed to use overly promotional language to describe LNG and its impact on the climate. For example, RBC's two publications employ the following expressions to describe natural gas and LNG:

- "Clean fuel exports"
- "Clean gas" (multiple occurrences)
- "Decarbonized natural gas"
- "Decarbonized and derisked natural gas market"
- "Low-carbon LNG"

But, instead of "clean," LNG is a fossil fuel that adds to global emissions, and "decarbonized" gas is an oxymoron given that carbon is always present in methane and is released as CO₂ at the combustion stage, whether gas production is equipped with carbon capture and storage technologies or whether LNG terminals are powered with renewables.

Examples of questionable messaging in NBCFM's thematic research publication include presenting LNG as a "a fossil fuel alternative that could help the planet more," supported by Canada's alleged "low emissions facilities."³¹ NBCFM goes even further by suggesting Canada not only has a responsibility, but a "vital role" to engage in gas expansion, stating that Canadian LNG expansion to displace Indian coal "would have a more profound impact on the planet than shutting down the Canadian economy entirely." That hyperbole again fails to note the economic challenges of coal-to-LNG switching and the range of emissions estimates associated with LNG.

2.4. None of the pieces note the banks' financial interests in LNG promotion

Both National Bank and RBC derive profits from financing LNG activity. National provided US\$1.2 billion of financing to LNG expansion between 2021 and 2023³², which includes US\$648 million to Venture Global LNG, US\$299 million to NextDecade Corporation, and US\$200 million to Port Arthur LNG.³³ In 2023, the bank multiplied its financing of LNG expansion by over 100 compared to 2022, with 16 transactions in 2023 alone, more than twice as much as in 2022.³⁴

RBC, which is among the top 20 global supporters of LNG expansion, provided US\$6.1 billion in LNG financing between 2021 and 2023. It completed no less than 51 transactions with LNG

³¹ National Bank of Canada Financial Markets, [Canada Has a Vital Role in Deleveraging the Global Environmental Balance Sheet](#), NBCFM Research (Feb. 2024), at 2 & 7.

³² Reclaim Finance and Greenpeace, [Frozen gas, boiling planet: How Canadian financial support for LNG is fueling a climate disaster](#) (Dec. 2024) at 10.

³³ Data courtesy of Reclaim Finance.

³⁴ Reclaim Finance and Greenpeace, *op. cit.*, at 15 & 16.

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developers in 2023 alone, increasing its LNG financing by 164% and 59% between 2021 and 2023.³⁵

Both banks therefore have a significant financial stake in promoting LNG, which is not disclosed in their LNG publications, despite the apparent conflict of interest. Readers should be made aware of this potential conflict so that they can better judge the claims the banks are making with the benefit of complete disclosure.

³⁵ *Ibid.*, at 10.