

**From:** Jennifer Newsom <Jennifer.Newsom@ffbt.com>  
**Sent:** Wednesday, June 01, 2022 9:08 AM  
**To:** Comments  
**Subject:** [EXTERNAL MESSAGE] April 4, 2022 - Statement of Principles for Climate-Related Financial Risk Management for Large Financial Institutions; Comment Request (RIN 3064-ZA32)

Dear FDIC,

I am writing regarding the FDIC's request for comment on its statement of principles for climate-related financial risk management for large financial institutions. I am the Senior Vice President, Lead Risk Management Officer at First Farmers Bank & Trust. First Farmers Bank & Trust is a \$2.5 billion community agriculture bank that has been in business since 1885. We are located in Indiana and western Illinois with 34 offices. We do understand that our institution is below the \$100 billion threshold, I am commenting because the FDIC has indicated that this first iteration of guidelines that may ultimately apply to all FDIC banks.

First Farmers Bank & Trust addresses climate risk in our loan portfolio with reviewing concentrations and limiting our exposure to one industry. We also discuss the geographic footprint of our loans within appropriate committees. Physically, the Bank is installing a second generator to continue serving our clients' needs in case of a disruption of services.

Supervisory expectations should be flexible, allowing for significant modifications as event occurs, as the practice of climate risk identification develops, and the risks become more clearly defined. The FDIC should not widen the scope of the guidance because it would impose significant burdens if applied to smaller banks.

The agencies should take steps to ensure that communities are supported and continue to have access to financial services. Banks are critical to thriving communities, providing financing to individuals, companies, and communities.

Thank you for considering my comments and allowing us to support our communities.

Yours truly,

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**[FFMR](#)**

First Farmers Financial Corp is a \$2.4 billion financial holding company headquartered in Converse, Indiana. First Farmers Bank & Trust has offices throughout Carroll, Cass, Clay, Grant, Hamilton, Howard, Huntington, Madison, Marshall, Miami, Starke, Sullivan, Tippecanoe, Tipton, Vigo and Wabash counties in Indiana and offices in Coles, Edgar and Vermilion counties in Illinois.

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