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Office of Regulations and Interpretations
US Department of Labor
Room N-5655
200 Constitution Avenue NW
Washington, DC 20210

RE: Proposed rule on Financial Factors in Selecting Plan Investments (RIN 1210-AB95)

To whom it may concern:

I write to provide comments in response to the Department of Labor's proposed rule, "Financial Factors in Selecting Plan Investments" (RIN 1210-AB95) (the "Proposal").

As an employee of an Impact Wealth Management firm, which utilizes investment funds and investment managers that incorporate sustainability analysis and/or environmental social and governance (ESG) criteria into their investment philosophy to identify impact and sustainable investments, I believe these funds and managers gain additional insight into potential business risks and opportunities by incorporating ESG criteria.

Funds and managers that focus on sustainable investing seek to invest in companies with practices, products, and/or services which may mitigate risks through their evaluation of externalities (e.g., greenhouse gas emissions, mining pollution, unfair employment practices, and lax corporate governance). I believe that funds and managers utilizing ESG and sustainability analysis are able to identify companies with quality management teams and are positioned to perform better than their peers over the long term.

The Proposal is likely to have the perverse effect of dissuading fiduciaries, even against their better judgment, from offering options for their plans that consider ESG criteria in addition to more traditional financial criteria. As a result, it will unfairly, and harmfully, limit plan participants' options and diversification opportunities.

Over the last 35 years I have been involved in both the Portfolio Management and Wealth Management ESG space. We find that companies whose management is forthright and considers their impact on the environment, employees and all stakeholders tend to outperform all other companies in their peer group. By removing this criteria from analysis and inclusion is a step in the wrong direction.

I respectfully request that the Proposal be withdrawn.

Thank you for your consideration of these comments.

Sincerely,

Patricia Addeo