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Financial Factors in Selecting Plan Investments

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General Comment

I am opposed to this rule for several reasons.

Investment managers should retain the right to consider all dimensions associated with their plans, including ESG criteria, so that we have the option to choose funds that align with our morals.

This rule goes against the ethos of free and fair market principles which are crucial to a strong economy and strong society.

ESG criteria has been shown in numerous studies to produce investment performance superior to, or in line with, non-ESG investments. The superior performance of ESG compliant funds will only increase in lockstep with the risks associated with fossil fuels and climate change.