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Financial Factors in Selecting Plan Investments

Comment On: EBSA-2020-0004-0002
Financial Factors in Selecting Plan Investments

Submitter Information

Name:

General Comment

Submitted via regulations.gov

July, 2020

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 investor in 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.

Please note, that while I recognize that this is a letter that has been composed by someone else, I am in total agreement with it and believe it is a very important issue.

I respectfully request that the Proposal be withdrawn.

Thank you for your consideration of these comments.

Sincerely,