

JULY 30, 2020

**BUSINESS LEADER
STATEMENT ON
THE PROPOSED RULE
ON FINANCIAL FACTORS
IN SELECTING PLAN
INVESTMENTS**

 **BUSINESSFORWARD**
FOUNDATION

RE: PROPOSED RULE ON FINANCIAL FACTORS IN SELECTING PLAN INVESTMENTS

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").

Business Forward works with more than 100,000 business leaders across the U.S. We have organized hundreds of briefings on climate change and clean energy. These briefings have included two Secretaries of Energy, two EPA Administrators, dozens of U.S. Senators and Congressmen, and hundreds of other officials. Our business leaders' interest in sustainable banking and ESG has grown substantially in recent years, tracking with the rapid growth in ESG assets under management. For our business leaders, ESG is about more than "corporate social responsibility." It signals strong management.

Investment returns demonstrate increasingly that ESG is material to financial performance, and demand for ESG analysis -- and ESG-centric funds -- has grown with it. Since 2016, investments in sustainable assets have grown 34% and now add up to nearly \$31 trillion globally. Despite the market's demand for ESG, the Proposal ignores how much professional investment managers rely upon ESG criteria when building portfolios. In doing so, the Trump Administration is practicing a reverse form of the "political correctness" it criticizes.

The Proposal will discourage fiduciaries from offering ESG options their clients -- and the market, in general -- demand. It will reduce consumer choice, plan diversification, and -- ultimately -- investment performance.

Labor should withdraw its Proposal.

OVER 90 BUSINESS LEADERS SIGNED THIS STATEMENT:

Aaeron Robb, Baltimore, MD
Alice Canestaro-Garcia, San Antonio, TX
Amelia Jones, Santa Monica, CA
Annalisa Peace, San Antonio, TX
Ben Thomas, New Bern, NC
Bernard Markstein, Silver Spring, MD
Beth Gelfond, New York, NY
Bryan Bennett, Kennesaw, GA

SIGNATORIES:

Carlos Nunez, Reseda, CA
Carol Brathwaite, Greensboro, NC
Christine Hayes, Upland, CA
Clifford Hansen, Tacoma, WA
Colleen Sheppard, Nashville, TN
Craig Stallone, Flushing, NY
Crystal Anne Mourad, Chico, CA
Dan Doepker, Tiffin, OH
Darcy Skarada, Kelseyville, CA
David Kunhardt, Corte Madera, CA
Deborah Howard, Saint Paul, MN
Deborah Childress, Sykesville, MD
Debra Rowe, Brighton, MI
Debra McCullough, Naperville, IL
Dyann Berndt, Berwyn, IL
Elizabeth Butler, Henderson, KY
Emmitt Wilson, Rochester, NY
Gerald Geist, New York, NY
Gertrude Robinson, McDonough, GA
Glen Poppo, Waterford, WI
Harjot Kaur, San Antonio, TX
Haydee Sabogal, Stamford, CT
Herman Whiterabbit, Madison, WI
Howard Stein, Parrish, FL
James Katzen, Las Vegas, NV
James Hickey, Springtown, TX
James Spickard, Bulverde, TX
Jane Obbagy, West Newton, MA
Jarrett Cloud, Morris Plains, NJ
Javier Del Valle, Montebello, CA
Jeremy Potash, Oakland, CA
Jeremy Baptist, Overland Park, KS
Jerry Clark, Durango, CO
Jim Rice, Baytown, TX

“ ‘Environmental, Social, and Governance’ (ESG) principles maximize tangible and intangible value for the larger populace. Making it more difficult to achieve those goals is ‘politically correct’ only for those who seek to maximize their economic utility at the cost ESG for all. ”

- JOHN KENAGY,
LONGVIEW, WA

“ This rule will prevent me from offering honest and beneficial information about investment opportunities. Research shows that ESG funds are as good as or better than general fund investments. Why would you want me to hurt my employees? This rule is pure politics -- and not worthy of an honest government. ”

- JAMES SPICKARD,
BULVERDE, TX

“ ESG is a pillar of sustainable capitalism... ”

- PHILLIP KOPP,
SAN DIEGO, CA

SIGNATORIES

Joanne Metzler, Rochester, NY
Jody Gibson, Des Moines, IA
John Kenagy, Longview, WA
John Boyd, Detroit, MI
John Duffy, Hatboro, PA
John Papandrea, New York, NY
Jorge M. El Koury Francisco, San Juan, PR
Jose Gonzalez, Houston, TX
Joyce Lee, Philadelphia, PA
Julian Buxton, Mount Pleasant, SC
Katherine Dander, Boston, MA
Ken Box, Austin, TX
Lenore Sivulich, New Gloucester, ME
Lois Corrin, Piedmont, CA
Marco A. Vasquez-Chong, Sunnyvale, CA
Mark Glasser, Los Angeles, CA
Mary O'Donnell, Sparks, NV
Matthew Mehalik, Pittsburgh, PA
Meredith McGuire, Bulverde, TX
Michael Zuckerman, Trenton, NJ
Michael Albrecht, Austin, TX
Michael F. Kolassa, Brooklyn, NY
Mike Phillips, San Antonio, TX
Pamela Jay, Tucson, AZ
Pamela Coker, Pueblo, CO
Patricia McGowan, Richmond, VA
Paul Sawyer, Dallas, TX
Peggy Van Sickle, Brighton, MI
Peng Cheng, Woodcliff Lake, NJ
Phillip Kopp, San Diego, CA
Randolph Willoby, Webster, TX
Rebecca Mosher, Columbus, OH
Rev. Edward Loggins III, Waterloo, IA
Richard Steel, Alamo, CA

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The ESG approach to investment assessment is fundamental to the full cost accounting discipline. It must be maintained.

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- TOM PIPAL,
PARKER, COLORADO

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Sustainability must be figured into the stakeholders' mix.

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- JOSHUA MCKAIN,
SCITUATE, MA

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My choice of ESG investments is in my best interests, because most of the time they perform better than investments in corporations that do not treat their workers well or that cause pollution and sickness.

”

- MEREDITH MCGUIRE,
BULVERDE, TX

SIGNATORIES

Robert Smith, York, PA
Ron Breuer, Riverhead, NY
Rosalyn Ryan, Arlington Heights, IL
Roxie Piatigorski, West Sacramento, CA
Sage Hunter Bornstein, New York, NY
Silvia Leahu-Aluas, Indianapolis, IN
Stacey Rickman, Indianapolis, IN
Stephen Sachs, Albuquerque, NM
Susan Shultz, Paradise Valley, AZ
Thomas Karwaki, Portland, OR
Tom Pipal, Parker, CO
Valarie Little, Jamestown, NC
Walter Maisel, Troy, MI
Wendi Cohen, Ossining, NY
Willard Goad, Thornton, CO

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It is imperative that the finance community accept the dire reality of climate chaos and shift its loan and investment focus away from fossil fuels and into sustainable agriculture, a sustainable health system and a sustainable economy.

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- CARL ARNOLD,
EAST MEREDITH, NY

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It is not just short-sighted but foolish to prevent investment in crucial solutions at critical times.

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- DARCY SKARADA,
KELSEYVILLE, CA

BUSINESS LEADER STATEMENTS

What business leaders are saying about ESG investing and sustainable finance:

Presently, our planet is facing multiple, significant environmental problems (e.g., global climate change, ocean acidification, increasing marine dead zones, increasing loss of biodiversity, etc.) If we wish to leave an ecologically viable world to our descendants, we must address these environmental problems now.

- Bryan Bennett, Kennesaw, GA

It is imperative that the finance community accept the dire reality of climate chaos and shift its loan and investment focus away from fossil fuels and into sustainable agriculture, a sustainable health system and a sustainable economy.

- Carl Arnold, East Meredith, NY

It is not just short-sighted but foolish to prevent investment in crucial solutions at critical times.

- Darcy Skarada, Kelseyville, CA

We all need thoughtful investments that will sustain our future.

- David Kunhardt, Corte Madera, CA

Do not reduce my choice.

- Debra Rowe, Brighton, MI

I have transferred my stocks/mutual funds to sustainable investments and taken all money out of fossil fuels. My portfolio is doing better than ever. That's because the fossil fuel industry is going down for the count.

- Diana Wright, Albany, NY

I take an active part in managing my retirement funds. I am outraged at this proposed rule that would interfere with my access to full information from my financial advisors.

- Elizabeth Butler, Henderson, KY

BUSINESS LEADER STATEMENTS

The finance/banking industry must begin to assign an imputed cost to fossil fuel producers... to reflect the environmental and social cost of such production. This should be considered as an unfunded liability that will count against current profitability and financial strength when compared with renewable and clean energy projects.

- Francisco Abreu, Miami, FL

This rule will prevent me from offering honest and beneficial information about investment opportunities. Research shows that ESG funds are as good as or better than general fund investments. Why would you want me to hurt my employees? This rule is pure politics -- and not worthy of an honest government.

- James Spickard, Bulverde, TX

Corporations can have a moral compass -- it's a good thing. Investors can have a moral compass, it may save the world.

- Jeremy Potash, Oakland, CA

Speaking from an economic point of view, the role of political leadership in a modern democracy is to 'maximize utility' for all citizens. 'Environmental, Social, and Governance' (ESG) principles maximize tangible and intangible value for the larger populace. Making it more difficult to achieve those goals is 'politically correct' only for those who seek to maximize their economic utility at the cost ESG for all.

- John Kenagy, Longview, WA

I always only invest in businesses that respect and protect our environment.

- Jonelle Ringnalda, Saint Paul, MN

Sustainability must be figured into the stakeholders' mix.

- Joshua McKain, Scituate, MA

BUSINESS LEADER STATEMENTS

This proposed rule is designed to prevent investors from choosing investments in a free market. My choice of ESG investments is in my best interests, because most of the time they perform better than investments in corporations that do not treat their workers well or that cause pollution and sickness... Our economy is already on a serious precipice, but rules like this will cripple it further and faster. Withdraw this rule immediately.

- Meredith McGuire, Bulverde, TX

It's time to get serious about transitioning away from the fossil fuel economy.

- Michelle Dugan, Upper Darby, PA

ESG is a pillar of sustainable capitalism... As an executive that touches this industry I believe that increasing the transparency of non-financial data can play a key role in stemming both the perception and the divide. To this end, all vested parties should advocate the increase of ESG standards as the effects may well find themselves apparent in the overall satisfaction of the populous.

- Phillip Kopp, San Diego, CA

The Department of Labor should withdraw its proposed rule on ESG.

- Richard Steel, Alamo, CA

Investors need to consider the planet's future when choosing where to invest funds.

- Steve Turner, Battle Creek, MI

The power of the public resides in our money and we must be proactive about how we spend and invest so as to protect our planet.

- Susan Opava, Arroyo Grande, CA

The ESG approach to investment assessment is fundamental to the full cost accounting discipline. It must be maintained.

- Tom Pipal, Parker, CO

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