

# PUBLIC SUBMISSION

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**Docket:** EBSA-2021-0013

Prudence and Loyalty in Selecting Plan Investments and Exercising Shareholder Rights

**Comment On:** EBSA-2021-0013-0001

Prudence and Loyalty in Selecting Plan Investments and Exercising Shareholder Rights

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## Submitter Information

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## General Comment

Please act to reject the proposed Prudence & Loyalty rule. This sort of end-around of our legislative process is of great concern to me. As a former fund portfolio manager, I know how difficult it is to generate differentiated returns for investors when solely focused on company/sector fundamentals and financial metrics with deep and stable methods for reporting and interpretation. The introduction of loosely defined, interpreted, and implemented ESG metrics amongst other non-pecuniary factors will serve to further complicate an already difficult job for capital allocators.