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Financial Factors in Selecting Plan Investments

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Financial Factors in Selecting Plan Investments

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Submitter Information

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General Comment

Office of Regulations and Interpretations
U.S. Department of Labor
Washington, DC 20210

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

To whom it may concern:

I am writing to provide comments in response to the Department of Labor's proposed rule, "Financial Factors in Selecting Plan Investments," which relates to ERISA-regulated retirement plans. I believe this rule should be withdrawn, as it goes against the desires of 86% of women and 95% of millennials according to research conducted by Morgan Stanley. Many men want this choice too.

People in this country WANT to invest their money with their values. I am one of those people.

There is now strong evidence showing that this choice DOES NOT result in financial loss. ESG criteria has been shown in numerous studies to produce investment performance superior or in line with non-ESG investments. This is because ESG criteria acts as a positive screen for superior funds and does not in any way dissuade from plan managers' pecuniary priorities. This has held true even during the market downturn due to the corona pandemic. Many ESG investments outperformed non-ESG investments.

Individuals who have their money invested through retirement funds and pension plans have the RIGHT to make decisions about how their money is invested. They should be given the option to choose investments that align with their values and so should their advisors. These choices should not be dictated by the government.

Investment managers should be given the right to consider all dimensions associated with their plans, including ESG criteria. Managers should not be shut out from competitive opportunities in the marketplace.

The US Department of Labor should withdraw this rule and continue to allow plan managers to operate within a free and fair marketplace. If you choose not to do so, then at the very least you should prove your case that these types of investments result in financial loss. I am tired of people continuing to promote this fallacy.

It is time to recognize that investing in companies that are well governed, aware of the future social implications of their business models, and integrating more stakeholders into their planning outperform companies that do not do this things. That is why more than 25% of all institutional capital is invested this way. Corporate leaders, investment corporations, and institutional investors understand this, why don't you?

Sincerely,