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# PUBLIC SUBMISSION

**Docket:** EBSA-2020-0004
Financial Factors in Selecting Plan Investments

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

**Document:** EBSA-2020-0004-DRAFT-0226
Comment on FR Doc # 2020-13705

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## Submitter Information

**Name:** Eve Ellis

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## General Comment

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").

The Proposal reveals a fundamental misunderstanding of how professional investment managers use environmental, social and governance criteria as an additional level of due diligence and analysis in the portfolio construction process. Investment managers increasingly analyze ESG factors precisely because they view these factors as material to financial performance. In the US SIF Foundation's 2018 survey of sustainable investment firms in the United States, 141 money managers with aggregate assets of more than $4 trillion responded to a question on their motivations for incorporating ESG criteria into their investment process. Three-quarters of these managers cited the desire to improve returns and to minimize risk over time. Fifty-eight percent cited their fiduciary duty obligations as a motivation.

I am one of those money managers.

Numerous studies show that the consideration of ESG criteria in investment analysis generally produces investment performances comparable to or better than non-ESG investments. There is no doubt that funds that use ESG criteria are consistent with long-term retirement objectives, including decreasing risk.

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 for stronger performance and decreased risk.

Thank you for your immediate attention to this matter. I implore you to withdraw this proposal.

Sincerely,
Eve Ellis