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General Comment

This new proposed rule is yet another attempt to cater to the interests of the fossil fuel sector. In the last decade, countless peer reviewed studies by financial institutions across the globe have shown over and over again that ESG funds have usually met, and often exceeded, the performance of comparable traditional investments. This is true on both an absolute and a risk-adjusted basis, across asset classes and overtime. - "Sustainable Reality: Understanding the Performance of Sustainable Investment Strategies", Morgan Stanley Institute for Sustainable Investing, March 2015

Mainstream investors have been implementing ESG considerations in their investment strategies successfully. Why would you undermine an effort that not only help tackles one of the greatest threats of our time, climate change, but also enriches the pockets of investors? Clearly, this new proposed rule, doesn't take into consideration any of the hard data and trends from the last decade. Global survey showed that more than half of global asset owners are currently implementing or evaluating ESG considerations in their investment strategy. Investors understand that material issues such as climate risk, board quality, or cybersecurity impact financial values in positive or negative ways and must be a part of the evaluation process. "Smart beta: 2018 global survey findings from asset owners", FTSE Russell, 2018

As a concerned US resident, I demand you reconsider introducing this new rule that doesn't benefit that public at large but only the fossil fuel sector.