Re: RIN 1210-AC03
Department of Labor – Employee Benefits Security Administration
29 CFR Part 2550
Prudence and Loyalty in Selecting Plan Investments and Exercising Shareholder Rights

November 26, 2021

I am submitting this letter to address the proposal from the U.S. Department of Labor (DOL) on removing barriers put in place by the prior administration that would have limited plan fiduciaries' ability to consider climate change and other environmental, social and governance (ESG) issues as risk factors affecting workers' financial security when fiduciaries select retirement plan investments and exercise shareholder proxy voting rights.

Background

I am a Millennial and I consider climate change a significant threat to my retirement savings. A personal story: Nearly a decade ago, I moved to a state that had better jobs for my skill set, and the weather was great. It used to rain regularly in the fall, around September. Wildfires were rare, and mostly not every year.

In the last few years, however, because of climate change, drought has become a problem and wildfires have become more frequent and more destructive because of the drier climate. In 2020 alone, the cost of wildfires in Colorado[1] was $200M, Oregon[2] was $130M, in Washington State[3] was $342M, and in California[4] it was a whopping $148.5B. When I visited New Delhi, India, a few years ago, I remember the air was so polluted that it smelled like a combination of burning trash, dust, and diesel exhaust. It was both medically unsafe to exercise outdoors and depressing to breathe the air with such a high level of PM2.5 particulate matter. I don't want my home state to become like that every year because of the smoke from fires caused by climate change. I don't want to fund that with my retirement savings in my 401(k). That's why I am personally investing my 401k in fossil-free funds, considering ESG factors as material to my returns.

ESG Investments are a Large and Growing Asset Class

According to Bloomberg, ESG investments are forecast to be a third of global assets under management by 2025.[5] In the U.S., we are already there. According the US SIF Foundation*,* as of year-end 2019, one out of every three dollars under professional management in the U.S—$17.1 trillion—was managed according to sustainable investing strategies.[6] And this category is growing: ESG funds got $51.1 billion of net new money from investors in 2020, a record and

[1] https://www.koaa.com/news/covering-colorado/the-estimated-cost-of-colorado-wildfires-surpasses-200-million-dollars
[2] https://www.eastoregonian.com/news/state/lloyds-of-london-could-once-again-pay-for-oregon-wildfire-costs/article_e7609f3c-a152-11eb-9360-4bf0575bd624.html
[3] https://www.king5.com/article/news/local/wildfire/lawmakers-close-to-approving-millions-for-washington-states-firefighting-efforts/281-f631ac0e-201e-47d5-b577-b6c6ae697bd3
[4] https://calmatters.org/economy/2021/10/california-wildfires-economic-impact/
[5] https://www.bloomberg.com/professional/blog/esg-assets-may-hit-53-trillion-by-2025-a-third-of-global-aum/
6 https://www.ussif.org/trends

more than double the prior year, according to Morningstar.[7]

ESG Funds did Better in the Pandemic

Since fiduciaries need to consider financial performance of fund options in 401k plans they manage, it's clear that ESG factors are no longer optional. An article by Institutional Investor[8] notes:

> *In the first year of the pandemic, large funds with environmental, social, and governance criteria outperformed the broader market, according to a report published this week by S&P Global. It's the latest of such analyses to suggest that ESG risks matter for investment performance, at least during a pandemic.*
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> *S&P's analysis included 26 ESG exchange-traded funds and mutual funds with more than $250 million in assets under management. From March 5, 2020 to March 5, 2021, 19 of the funds grew between 27.3 percent and 55 percent, outpacing the S&P 500 index's 27.1 percent rise, according to S&P.*

To me, this is evidence that fiduciaries should be required to consider ESG factors in fund selection, rather than seeing ESG as optional.

ESG Funds Should Be Among the Default Choices for 401(k) Plans

For all the above reasons, I support using ESG funds as Qualified Default Investment Alternatives (QDIAs) – i.e. the "default options" to pick from in a 401k in automatic enrollment 401(k)-type defined contribution plans.

In conclusion, climate change and other ESG factors are financially material, and, when they are, considering them will inevitably lead to better long-term risk-adjusted returns, protecting the retirement savings of America's workers.

I also encourage the DOL to work with the SEC and other market participants, including companies like HIP Investor, Third Economy, US SIF and organizations like the Ceres Investor Network to facilitate more transparency, formalized standards, and higher accountability to those standards of reporting and disclosure. This will ensure the markets operate more efficiently and allow investors to pursue net-positive benefits for people, the planet, and trust, as well as risk-adjusted financial returns at the same time.

Thank you,

Katharine Bierce

DISCLAIMER: These comments are my own personal opinion and not that of my employer.

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7 https://www.cnbc.com/2021/02/11/sustainable-investment-funds-more-than-doubled-in-2020-.html

8 https://www.institutionalinvestor.com/article/b1r9gb5p9k10b4/Here-s-More-Evidence-That-ESG-Funds-Outperformed-During-the-Pandemic