

PUBLIC SUBMISSION

Received: December 13, 2021 Tracking No. kx4-vmi7-jdwa Comments Due: December 13, 2021 Submission Type: Web
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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

Document: EBSA-2021-0013-DRAFT-3940

Submitter Information

Organization: Environmental Defense Fund, Institute for Policy Integrity at NYU Law, and Initiative on Climate Risk & Resilience Law

General Comment

To Whom It May Concern:

Environmental Defense Fund, the Institute for Policy Integrity at NYU School of Law, and the Initiative on Climate Risk and Resilience Law respectfully submit the attached materials to the Department of Labor in response to its proposed rule “Prudence and Loyalty in Selecting Plan Investments and Exercising Shareholder Rights” (RIN 1210-AC03), published on October 14, 2021.

Respectfully Submitted,

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Attachments (9):

(1) Environmental Defense Fund, Institute for Policy Integrity, & Initiative on Climate Risk & Resilience Law, Comment Letter on Prudence and Loyalty in Selecting Plan Investments and Exercising Shareholder Rights (RIN 1210-AC03) (Dec. 13, 2021) (with Appendices of Sources)

(1A) Appendix A

(1B) Appendix B

(1C) Appendix C

(2) Environmental Defense Fund & Institute for Policy Integrity, Comment Letter on Financial Factors in Selecting Plan Investments under the Employee Retirement Income Security Act of 1974 (RIN 1210-AB95) (July 30, 2020) (with Appendices of Sources)

(2A) Appendix 1

(2B) Appendix 2

(2C) Appendix 3

(3) Environmental Defense Fund & Institute for Policy Integrity, Comment Letter on Fiduciary Duties Regarding Proxy Voting and Shareholder Rights under the Employee Retirement Income Security Act of 1974 (RIN 1210-AB91) (Oct. 5, 2020)

Attachments

Attachment 1 - EDF Policy Integrity ICRRL - 2021 DOL Comments

Attachment 1A - EDF Policy Integrity ICRRL - 2021 DOL Comments - Appendix A

Attachment 1B - EDF Policy Integrity ICRRL - 2021 DOL Comments - Appendix B

Attachment 1C - EDF Policy Integrity ICRRL - 2021 DOL Comments - Appendix C

Attachment 2 - EDF Policy Integrity - 2020 Investing Rule Comments

Attachment 2A - EDF Policy Integrity - 2020 Investing Rule Comments - Appendix 1

Attachment 2B - EDF Policy Integrity - 2020 Investing Rule Comments - Appendix 2

Attachment 2C - EDF Policy Integrity - 2020 Investing Rule Comments - Appendix 3

Attachment 3 - EDF Policy Integrity - 2020 Proxy Rule Comments