PUBLIC SUBMISSION

Received: December 08, 2021
Tracking No. kwx-q34w-z5fc
Comments Due: December 13, 2021
Submission Type: Web

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-3081

Submitter Information

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General Comment

Dear Acting Assistant Secretary Khawar,

I respectfully submit this letter in support of the Department's proposed rule, Prudence and Loyalty in Selecting Plan Investments and Exercising Shareholder Rights ("the Proposed Rule.")

This important proposal builds on decades of conscientious stewardship of private-sector American retirement savings. Employee Retirement Income Security Act (ERISA) plans help create retirement security for working Americans. In 2020, under the prior administration, the Department enacted new rules that effectively prohibited ERISA plans from considering climate or other ESG factors in their investment selection and proxy voting.

These 2020 rules left retirement savers unnecessarily exposed to the negative economic impacts of climate change, and silenced their voices on important issues of corporate governance. The Proposed Rule would fix this.

Retirement savings must be protected from climate-related financial risk

Managers of retirement plans must be free to evaluate all factors that impact plan investments. Climate related disasters are increasingly frequent, with a record 22 events causing over $1 billion damage each in the US during 2020 alone. In response to the climate crisis, new regulation and changes in consumer demand will create significant market and investment opportunities. These risks and opportunities are especially relevant to retirement investors, who invest over decades.

Many professional investors recognize these risks and opportunities, and have updated their investment strategies to deal with the realities of our changing environment. Individual investors share these concerns. Climate change and other ESG risks will be a significant driver of investment risk and return for the foreseeable future. But because of these 2020 rules, very few American retirement savings plans are designed to protect their beneficiaries from climate risk. The Proposed Rule will allow these savings plans to better manage these and other ESG risks.

It is now clear that climate change poses an existential challenge to our very livelihoods. But if we can embrace the changes required to meet this challenge, the US economy has tremendous potential to grow, creating jobs and wealth. The Proposed Rule clears the way for ERISA plans to provide access to these investment opportunities.

It is consistent with Department policy that has served American workers well in the nearly 50 years since ERISA became law.

I appreciate the Department's hard work in drafting this timely and thoughtful Proposed Rule.

Sincerely,
Sarah M. Schaadt