



December 6, 2021

**VIA ELECTRONIC FILING**

Ali Khawar  
Acting Assistant Secretary  
US Department of Labor  
Room N-5655  
200 Constitution Avenue NW  
Washington, DC 20210

**RE: RIN 1210-AC03 Proposed rule on Prudence and Loyalty in Selecting Plan Investments and Exercising Shareholder Rights**

Dear Mr. Khawar,

Boston Trust Walden Company is an independent, employee-owned investment management firm with \$13.5 billion in assets under management. As an investment manager and fiduciary, we seek to ensure our clients' assets are invested in securities positioned to manage risk. (b) (5) - DPP

highest carbon emitters, for example, compels a thoughtful consideration of the role and risk of fossil fuels in a portfolio with a long-term investment objective.

The Proposed Rule clears the way for investment managers to consider ESG factors precisely because of risk, return, and fiduciary considerations. T