



Via electronic delivery

December 5, 2018

Hon. Jay Clayton
Chairman
U.S. Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549

Re: File 4-725, Staff Roundtable on the Proxy Process

Dear Chairman Clayton:

I am writing you on behalf of Green Century Capital Management, Inc. (Green Century) to express our support for the comment letter sent by the Interfaith Center for Corporate Responsibility (ICCR) sent to the SEC on November 6, 2018.

Green Century is a sustainable investment firm representing over \$500 million in assets under management and is a member of ICCR. Green Century relies on the current process to ensure that we are able to accurately address and directly discuss the issue of material risk to our investors and fulfill our fiduciary duty. Our ability to file and co-file shareholder proposals is critical to compel companies to address these business, reputational, and material risks. Many times companies are unaware of growing consumer criticisms and activist campaigns that can drive down share price and damage brands. The dialogue that accompanies the filing of a shareholder resolution is the mechanism by which companies get this information and assistance.

We believe that the current shareholder proposal process (structured and administered under SEC Rule 14a-8), fairly serves this purpose effectively. It provides a well-organized, reasonable, and cost-effective way for Green Century, and its investors, to work with companies to hear and address shareholder concerns regarding issues of sustainability, financial and/or reputational risk, and corporate governance; ultimately, helping to serve the best interests of the company and its shareholders. Our long history of corporate engagement has not only created significant value for both our investors and companies alike, but have played a vital role in positively contributing to the welfare of communities and the environment on a global scale.

Therefore, we believe that the current shareholder proposal process is a critical tool that should be preserved.

Sincerely,

Leslie Samuelrich
President
Green Century Capital Management, Inc.