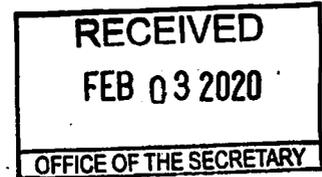


The Honorable Jay Clayton
Chairman
Securities and Exchange Commission
100 F Street NE
Washington, DC 20549
United States



Vanessa A. Countryman
Secretary, Securities and Exchange Commission
100 F Street NE
Washington, DC 20549-1090
United States

21/01/2020

Dear Chairman Clayton and Secretary Countryman,

Re: Comments on Proposed Amendments to Exemptions from the Proxy Rules for Proxy Voting Advice (File No.: S7-22-19) and Proposed Amendments to Procedural Requirements and Resubmission Thresholds Under Exchange Act Rule 14a-8 (File No: S7-23-19)

Environment Agency Pension Fund submits the following comments in response to the Securities and Exchange Commission's proposed rulemakings published in the federal register on December 4, 2019 (84 FR 66518 and 84 FR 66458).

Environment Agency Pension Fund (EAPF) is the pension fund for the Environment Agency in England. We strongly believe in our responsibilities for stewardship and the exercise of our rights as owners. EAPF is a signatory of the UK Stewardship Code and our Stewardship Code Compliance Statement evidences our compliance with both the UK Code and other global best principles of good stewardship.

The Fund believes that voting is integral part of the responsible investment and stewardship process. We have, in the past, co-filed and/or supported co-filed resolutions which we felt strongly about. We have seen great progress brought about through co-filing, particularly in the area of climate change, where companies have acknowledged the benefits of the resolution and implemented its recommendations. This is more important than ever.

We are against any move that limits the right of shareholders to co-file resolutions, especially in light of such resolutions bringing about long-term benefit to both companies, shareholders and wider society.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Craig Martin". The signature is written in a cursive style with a long horizontal line extending to the left.

Craig Martin
Chief Pensions Officer
Environment Agency Pension Fund

Horizon House, Deanery Road, Bristol, BS1 5AH
Email: info@eapf.org.uk
Website: www.eapf.org.uk