

**Fidelity Investment Trust  
Fidelity Canada Fund**

**VIA ELECTRONIC MAIL: [imshareholderproposals@sec.gov](mailto:imshareholderproposals@sec.gov)**

December 20, 2019

U.S. Securities & Exchange Commission  
100 F Street NE  
Washington, DC 20549  
Attn: Office of Disclosure and Review

Re: Shareholder Proposals for: Fidelity Canada Fund, series of Fidelity Investment Trust  
(File No. 811-04008)

Ladies and Gentlemen:

As indicated in the table below, letters were received at the principal executive offices of Fidelity Canada Fund (the "Fund"), requesting that a proposal be submitted to shareholders at the next scheduled meeting of the Fund. As detailed in the letters, copies of which are attached, the proposals request that the Boards of Trustees of the Fund implement certain procedures to prevent the Fund from holding investments in companies that, in management's judgment, substantially contribute to genocide or crimes against humanity.

<b>Shareholder (each, a "Proponent" and collectively the Proponents)</b>	<b>Proposal Dated</b>	<b>Defect Letter (the "Defect Letter") Dated</b>
Erin O'Brien	April 5, 2010	August 30, 2018 and October 9, 2018
Peter J. Barrer	July 30, 2010	August 30, 2018

Pursuant to Rule 14a-8(b)(1), to be eligible to submit a proposal, a shareholder must have continuously held at least \$2,000 in market value, or 1%, of the company's securities entitled to be voted on the proposal at the meeting for at least one year by the date the proposal is submitted, and must continue to hold those securities through the date of the meeting. Upon initial receipt of the letters, the Fund verified that each Proponent met the eligibility requirements to submit a proposal pursuant to Rule 14a-8(b)(1). In preparation for an upcoming shareholder meeting, the Fund attempted to verify that each Proponent continues to satisfy the eligibility requirements of Rule 14a-8(b)(1). The Fund determined that each Proponent was not a record owner of the Fund's shares. On the dates referred to above, we sent each Proponent a Defect Letter, copies of which are attached, requesting that the Proponent provide the information necessary to confirm that he or she continues to meet the requirements of Rule 14a-8(b)(1). To date, the Proponents have not responded to the Fund's requests and have not provided the

information necessary to permit the Fund to confirm that the requirements of Rule 14a-8(b)(1) continue to be satisfied.

The next shareholder meeting for the Fund is scheduled to be held on or about May 20, 2020. Because the Fund is unable to confirm based on its records that either Proponent continues to be a shareholder of the Fund and has continuously held the requisite amount of that Fund's shares since the submission of the proposal as required by Rule 14a-8(b)(1), and because neither Ms. O'Brien nor Mr. Barrer have responded to requests to provide additional holdings information, we intend to omit this proposal from the proxy statements for the Funds as permitted by Rule 14a-8(f)(1).

If you have questions or comments concerning this matter, please contact Brian Blackburn at (617) 563-7121.

Sincerely,



Cynthia Lo Bessette  
Secretary of the Trust

Enclosures:

Letters to Erin O'Brien  
Letter from Erin O'Brien

Letter to Peter J. Barrer  
Letter from Peter J. Barrer

cc: Erin O'Brien  
Peter J. Barrer

**FIDELITY INVESTMENT TRUST**  
**Fidelity Canada Fund**

**FIDELITY HASTINGS STREET TRUST**  
**Fidelity Growth Discovery Fund**

**FIDELITY MAGELLAN FUND**  
**Fidelity Magellan Fund**

**VIA CERTIFIED MAIL,  
RETURN RECEIPT REQUESTED**

August 30, 2018

Erin O'Brien  


Dear Ms. O'Brien:

Your previously submitted shareholder proposals, dated April 5, 2010 for the funds (each, a "Fund") and registrants (each, a "Trust") identified in the table below.

Fund	Registrant
Fidelity Canada Fund	Fidelity Investment Trust
Fidelity Growth Discovery Fund	Fidelity Hastings Street Trust
Fidelity Magellan Fund	Fidelity Magellan Fund

Rule 14a-8(b)(1) provides that in order to be eligible to submit a proposal for inclusion in a proxy statement for a fund, a shareholder must have "continuously held at least \$2,000 in market value, or 1%, of the company's securities entitled to be voted on the proposal at the meeting for at least one year by the date [the shareholder] submit[s] the proposal and "must continue to hold those securities through the date of the meeting." As required by Rule 14a-8(b)(2), you have provided a written statement that you "intend to meet Rule 14a-8 requirements including the continuous ownership of the required stock value until after the date of the respective shareholder meeting."

Based on a review of the Fund's records, we are unable to confirm that you continue to hold the amount of Fund shares required under Rule 14a-8(b)(1). As provided in Rule 14a-8(b)(2), we request that you provide us with information about your holdings so that we may verify your continued eligibility to submit a shareholder proposal for the Fund.

By this letter we hereby provide you with the opportunity to send us information regarding your holdings with respect to shares of the Fund so that we may verify that you have continuously held the requisite amount of Fund shares and, thus, continue to be eligible to submit a shareholder proposal for the Fund. We request that your response be postmarked, or transmitted electronically, no later than 14 days from the date you receive this notification.

Please direct all further correspondence with respect to this shareholder proposal to: Fund Shareholder Meetings, 245 Summer Street, Mailzone V10B, Boston, MA 02110 or (617) 385-2890 (fax).

Erin O'Brien  
August 30, 2018  
Page Two

This letter shall not be deemed to waive any right of the Fund to omit any proposal from the proxy materials for the Fund's next shareholders' meeting for any other reason.

Sincerely,

A handwritten signature in blue ink that reads "Marc R. Bryant". The signature is written in a cursive style with a long horizontal stroke at the end.

Marc R. Bryant  
Secretary of the Trust



**FIDELITY INVESTMENT TRUST  
Fidelity Canada Fund**

**FIDELITY HASTINGS STREET TRUST  
Fidelity Growth Discovery Fund**

**FIDELITY MAGELLAN FUND  
Fidelity Magellan Fund**

**VIA CERTIFIED MAIL,  
RETURN RECEIPT REQUESTED**

October 9, 2018

Erin O'Brien

Dear Ms. O'Brien:

Your previously submitted shareholder proposals, dated April 5, 2010 for the funds (each, a "Fund") and registrants (each, a "Trust") identified in the table below.

Fund	Registrant
Fidelity Canada Fund	Fidelity Investment Trust
Fidelity Growth Discovery Fund	Fidelity Hastings Street Trust
Fidelity Magellan Fund	Fidelity Magellan Fund

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Based on a review of the Fund's records, we are unable to confirm that you continue to hold the amount of Fund shares required under Rule 14a-8(b)(1). As provided in Rule 14a-8(b)(2), we request that you provide us with information about your holdings so that we may verify your continued eligibility to submit a shareholder proposal for the Fund.

By this letter we hereby provide you with the opportunity to send us information regarding your holdings with respect to shares of the Fund so that we may verify that you have continuously held the requisite amount of Fund shares and, thus, continue to be eligible to submit a shareholder proposal for the Fund. We request that your response be postmarked, or transmitted electronically, no later than 14 days from the date you receive this notification. In the interest of time, we have also sent a copy of this letter to your address in North Grafton, Massachusetts. The content of that letter is identical and you need only respond to one copy for validation purposes.

Erin O'Brien  
October 9, 2018  
Page Two

Please direct all further correspondence with respect to this shareholder proposal to: Fund Shareholder Meetings, 245 Summer Street, Mailzone V10B, Boston, MA 02110 or (617) 385-2890 (fax).

This letter shall not be deemed to waive any right of the Fund to omit any proposal from the proxy materials for the Fund's next shareholders' meeting for any other reason.

Sincerely,



William C. Coffey  
Secretary of the Trust

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**FIDELITY INVESTMENT TRUST  
Fidelity Canada Fund**

**FIDELITY HASTINGS STREET TRUST  
Fidelity Growth Discovery Fund**

**FIDELITY MAGELLAN FUND  
Fidelity Magellan Fund**

**VIA CERTIFIED MAIL,  
RETURN RECEIPT REQUESTED**

October 9, 2018

Erin O'Brien  


Dear Ms. O'Brien:

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Fund	Registrant
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Based on a review of the Fund's records, we are unable to confirm that you continue to hold the amount of Fund shares required under Rule 14a-8(b)(1). As provided in Rule 14a-8(b)(2), we request that you provide us with information about your holdings so that we may verify your continued eligibility to submit a shareholder proposal for the Fund.

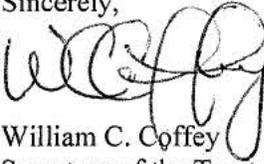
By this letter we hereby provide you with the opportunity to send us information regarding your holdings with respect to shares of the Fund so that we may verify that you have continuously held the requisite amount of Fund shares and, thus, continue to be eligible to submit a shareholder proposal for the Fund. We request that your response be postmarked, or transmitted electronically, no later than 14 days from the date you receive this notification.

Please direct all further correspondence with respect to this shareholder proposal to: Fund Shareholder Meetings, 245 Summer Street, Mailzone V10B, Boston, MA 02110 or (617) 385-2890 (fax).

Erin O'Brien  
October 9, 2018  
Page Two

This letter shall not be deemed to waive any right of the Fund to omit any proposal from the proxy materials for the Fund's next shareholders' meeting for any other reason.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Coffey", with a long, sweeping horizontal line extending to the right from the end of the signature.

William C. Coffey  
Secretary of the Trust

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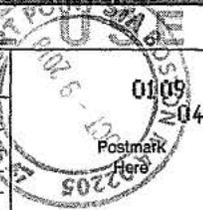
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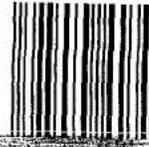
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Secretary  
Fidelity Investments  
82 Devonshire Street  
Boston, Massachusetts 02109

To the Secretary:

I am writing to submit the enclosed shareholder proposals for inclusion in the funds' next proxy statement and for presentation at their next shareholder meeting. I hope that once they are on the ballot, you will take a favorable, or at least neutral, stance with regard to the proposals.

I hold 172 shares of the Fidelity Growth Discovery Fund in account [REDACTED] 44.9 shares of the Fidelity Canada Fund in account [REDACTED] and 32 shares of the Fidelity Magellan Fund in account [REDACTED]

I am also enclosing statements of my account to confirm my ownership of said shares. I have continuously held at least \$2,000 of each fund for over a year and it is my intention to continue to do so.

Please confirm receipt of this cover letter and the proposal. If for any reason you choose to exclude this proposal from your proxy please notify me at the above address.

Other shareholders may have submitted this shareholder proposal in support of a campaign initiated by Investors Against Genocide. If another shareholder has already submitted the same proposal, please consider this a joint submission in support of his/her proposal.

Thanks for your consideration.

Sincerely,



Erin O'Brien

Enclosures

20.48-009819-040810.125 040810 1256EDT

## Genocide-free Investing Shareholder Proposal for Fidelity Growth Discovery Fund

**WHEREAS:**

Fidelity has released no genocide-free investing policy to prevent investments that contribute to genocide. It may at any time increase such holdings or involve new mutual funds. As a result, individuals, through their mutual funds, may inadvertently invest in companies helping to fund genocide because of investment decisions made by Fidelity.

We believe that:

- 1) Investors do not want their pensions and family savings connected to genocide.
  - a) Reasonable people may disagree about what constitutes socially responsible investing, but few people want their savings connected to genocide.
  - b) In the face of the most extreme human rights crises investment companies share responsibility, along with government, to act.
  - c) In KRC Research's 2007 study, 71% of respondents said companies should consider extreme human rights abuses, such as genocide, when making investment decisions. Millions of people voted for similar shareholder proposals, submitted by supporters of Investors Against Genocide, despite active management opposition.
  
- 2) This problem is particularly important to shareholders because Fidelity:
  - a) Has, for years, been a large holder of PetroChina, which, through its closely related parent, China National Petroleum Company, is internationally recognized as the worst offender helping fund the Government of Sudan's genocide in Darfur.
  - b) Actively opposed earlier shareholder requests for genocide-free investing.
  - c) Continued to buy shares of problem companies even after becoming aware of the investment's connection to the Darfur genocide.
  - d) Claimed to have a policy addressing extreme human rights issues, but has taken no action to avoid problem investments.
  
- 3) A policy against investments in genocide must:
  - a) Be clear and transparent.
  - b) Apply today and to any future genocide.
  - c) Prevent purchasing shares of companies known to substantially contribute to genocide.
  - d) Require corrective action for existing problem investments. If the fund holds problem companies and can effectively influence their behavior, then time-limited engagement may be appropriate. If not, the problem investments should be sold.
  
- 4) There are no sound financial, fiduciary, or legal reasons that prevent the fund from having a policy against investments in genocide, as TIAA-CREF demonstrated in 2009.
  - a) Ample competitive investment choices exist, even with index funds.
  - b) Avoiding a small number of problem companies need not have a significant effect on performance, as shown in Gary Brinson's classic asset allocation study.
  - c) Even the most conservative legal concerns can be addressed by a small change to the prospectus.
  - d) Management can easily obtain independent assessments of problem companies and their connection to genocide.
  
- 5) Investor pressure can help influence foreign governments, as in South Africa. Similarly, divestment pressure on Talisman Energy helped end the conflict in South Sudan.

**RESOLVED:**

Shareholders request that the Board institute transparent procedures to prevent holding investments in companies that, in management's judgment, substantially contribute to genocide or crimes against humanity, the most egregious violations of human rights.

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**FIDELITY INVESTMENT TRUST**  
**Fidelity Canada Fund**

**FIDELITY SUMMER STREET TRUST**  
**Fidelity Capital & Income Fund**

**VIA CERTIFIED MAIL,  
RETURN RECEIPT REQUESTED**

August 30, 2018



Dear Mr. Barrer:

Your previously submitted shareholder proposals, dated July 30, 2010, for the funds (each, a “Fund”) and registrants (each, a “Trust”) identified in the table below.

Fund	Registrant
Fidelity Canada Fund	Fidelity Investment Trust
Fidelity Capital & Income Fund	Fidelity Summer Street Trust

Rule 14a-8(b)(1) provides that in order to be eligible to submit a proposal for inclusion in a proxy statement for a fund, a shareholder must have “continuously held at least \$2,000 in market value, or 1%, of the company’s securities entitled to be voted on the proposal at the meeting for at least one year by the date [the shareholder] submit[s] the proposal and “must continue to hold those securities through the date of the meeting.” As required by Rule 14a-8(b)(2), you have provided a written statement that you “intend to meet Rule 14a-8 requirements including the continuous ownership of the required stock value until after the date of the respective shareholder meeting.”

Based on a review of the Fund’s records, we are unable to confirm that you continue to hold the amount of Fund shares required under Rule 14a-8(b)(1). As provided in Rule 14a-8(b)(2), we request that you provide us with information about your holdings so that we may verify your continued eligibility to submit a shareholder proposal for the Fund.

By this letter we hereby provide you with the opportunity to send us information regarding your holdings with respect to shares of the Fund so that we may verify that you have continuously held the requisite amount of Fund shares and, thus, continue to be eligible to submit a shareholder proposal for the Fund. We request that your response be postmarked, or transmitted electronically, no later than 14 days from the date you receive this notification.

Please direct all further correspondence with respect to this shareholder proposal to: Fund Shareholder Meetings, 245 Summer Street, Mailzone V10B, Boston, MA 02110 or (617) 385-2890 (fax).

Peter J. Barrer  
August 30, 2018  
Page Two

This letter shall not be deemed to waive any right of the Fund to omit any proposal from the proxy materials for the Fund's next shareholders' meeting for any other reason.

Sincerely,

A handwritten signature in blue ink, appearing to read "Marc R. Bryant". The signature is fluid and cursive, with the first name "Marc" and last name "Bryant" clearly distinguishable.

Marc R. Bryant  
Secretary of the Trust

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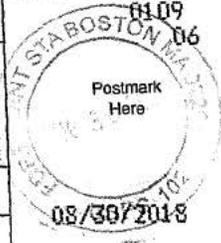
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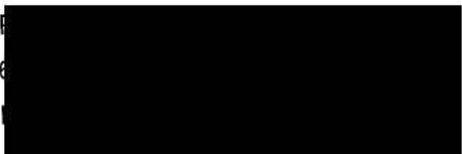
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  - Return Receipt for Merchandise
  - Signature Confirmation™
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Peter J. Barrer

*Rec'd Fidelity Legal Dept.*  
AUG 03 2010

July 30, 2010

Fidelity Investments  
Secretary of the Trust  
Attention "Fund Shareholder Meetings"  
82 Devonshire Street, Mailzone V10A  
Boston, Massachusetts 02109

To the Secretary:

I am writing to submit the enclosed shareholder proposals (4) to **Fidelity's Canada Fund, International Discovery Fund, Capital and Income Fund and Investment Grade Bond Fund** for inclusion in their next proxy statements and for presentation at their next shareholder meetings. I hope that once this is on the ballot, you will take a favorable, or at least neutral, stance with regard to the proposal.

I hold 4,187 shares of Canada Fund,  
526 shares of International Discovery Fund,  
31,684 shares of Capital and Income Fund and  
37,557 shares of Investment Grade Bond Fund  
in Fidelity account number [REDACTED] in my name and address as listed above.

I am also enclosing a statement of my Fidelity account to confirm my ownership of said shares. I have continuously held at least \$2,000 of these four funds for over a year and it is my intention to continue to do so.

Please confirm receipt of this cover letter and four shareholder proposals. If for any reason you choose to exclude this proposal from your proxy please notify me at the above address.

Other shareholders may have submitted this shareholder proposal in support of a campaign initiated by Investors Against Genocide. If another shareholder has already submitted the same proposal, please consider this a joint submission in support of his/her proposal.

Thank you for your consideration.

Sincerely,

[REDACTED]  
Peter J. Barrer

## **Genocide-free Investing Shareholder Proposal for Fidelity Canada Fund**

### **WHEREAS:**

Fidelity has released no genocide-free investing policy to prevent investments in companies that contribute to genocide. It may at any time increase such holdings or involve new mutual funds. As a result, individuals, through their mutual funds, may inadvertently invest in companies helping to fund genocide because of investment decisions made by Fidelity.

We believe that:

- 1) Investors do not want their pensions and family savings connected to genocide.
  - a) Reasonable people may disagree about what constitutes socially responsible investing, but few people want their savings connected to genocide.
  - b) In the face of the most extreme human rights crises investment companies share responsibility, along with government, to act.
  - c) In KRC Research's 2010 study, 88% of respondents said they would like their mutual funds to be genocide-free.
  - d) Millions of people have voted for shareholder proposals similar to this one, submitted by supporters of Investors Against Genocide, despite active management opposition.
  
- 2) This problem is particularly important to shareholders because Fidelity:
  - a) Has, for years, been a large holder of PetroChina, which, through its closely related parent, China National Petroleum Company, is internationally recognized as the worst offender helping fund the Government of Sudan's genocide in Darfur.
  - b) Actively opposed earlier shareholder requests for genocide-free investing.
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  - d) Require corrective action for existing problem investments. If the fund holds problem companies and can effectively influence their behavior, then time-limited engagement may be appropriate. If not, the problem investments should be sold.
  
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- 5) Investor pressure can help influence foreign governments, as in South Africa. Similarly, divestment pressure on Talisman Energy helped end the conflict in South Sudan.

### **RESOLVED:**

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