



June 6, 2019

Accountability Counsel – USA
Other Interested Civil Society Organizations and Practitioners

Re: Comments on DFC's Application for Debt Financing (DFC-001)

Dear Interested Civil Society Organizations and Practitioners:

This letter presents the Overseas Private Investment Corporation's (OPIC) response, on behalf of the U.S. International Development Finance Corporation (DFC), to comments of the Interested Civil Society Organizations and Practitioners (see Attachment A) pertaining to the OPIC Federal Register notice, titled "Submission for OMB Review; Comments Request" related to DFC's Application for Debt Financing (DFC-001), published on March 22, 2019.

In your letter of May 20, 2019, you requested that OPIC/DFC:

- 1) Edit Question 5 to make it clear that explanation of the social-developmental goals of the project is an important requirement;

OPIC/DFC Response: OPIC/DFC agrees and will make the requested edits.

- 2) Augment screening and monitoring procedures to ensure that all projects fulfill their projected developmental impacts. There is no specific change to DFC-001 recommended regarding this point;

OPIC/DFC Response: No change to the form is required. Nonetheless, we thank you for your input and will consider this recommendation going forward.

- 3) Strengthen the introductory language in the Business Plan/Preliminary Information Memorandum section of the Supporting Documentation list to make it clear that the items listed are important requirements rather than mere suggestions;

OPIC/DFC Response: OPIC/DFC agrees and will make the requested edits.

- 4) Add requirements listed in the business plan section of the Supporting Documentation list to include description of key parties' possible inclusion on debarment lists published by various International Financial Institutions (IFIs), or their involvement in complaints lodged with Independent Accountability Mechanisms (IAMS), National Contact Points (NCPs) or other venues for community-related grievances.

OPIC/DFC Response: OPIC has evaluated the efficacy of asking applicants to provide such information in our forms vs. determining the answers via our extensive character risk due diligence utilizing independent information sources, which include IFI debarment lists. We have found that the independent due diligence process is more effective in uncovering information on these important topics than attempting to collect such information through the form. Therefore, adding this requirement is unnecessary.

OPIC appreciates your comments to the DFC-001 and your engagement on these important issues.

Sincerely,

A handwritten signature in black ink, appearing to read 'Genevieve Stubbs', with a long horizontal line extending to the left.

Genevieve Stubbs
Senior Administrative Counsel
Overseas Private Investment Corporation

Attachment A -- Interested Civil Society Organizations and Practitioners

Abibiman Foundation -- Ghana
Accountability Counsel -- United States
Actions Paysages contre la Faim -- Democratic Republic of Congo
African Coalition for Corporate Accountability (ACCA) -- South Africa
Buliisa Initiative for Rural Development Organisation (BIRUDO) -- Uganda
Center for Biological Diversity -- United States
Center for International Environmental Law (CIEL) -- United States
Centre for Human Rights and Development -- Mongolia
COMPPART -- Nigeria
Conseil Régional des Organisations Non Gouvernementales de Développement -- Democratic Republic of Congo
Friends of the Earth U.S. -- United States
Fundación Ambiente y Recursos Naturales -- Argentina
Gender Action -- United States
Greenpeace U.S. -- United States
International Accountability Project (IAP) -- United States
Lumière Synergie pour le Développement -- Senegal
Nash Vek Public Foundation -- Kyrgyzstan
Observatoire d'Etudes et d'Appui à la Responsabilité Sociale et Environnementale (OEARSE) -- Democratic Republic of Congo
Oyu Tolgoi Watch -- Mongolia
Rivers without Boundaries Coalition -- Mongolia
Youth For Environmental Education and Development Foundation (YFEED Foundation) -- Nepal
Youth Group on Protection of Environment -- Tajikistan