



June 6, 2019

Accountability Counsel – USA  
Other Interested Civil Society Organizations and Practitioners

Re: Comments on DFC's Application for Debt Financing (DFC-009)

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 Aligned Capital Investor Screener (DFC-009), published on March 22, 2019.

In your letter of May 20, 2019, you requested that OPIC/DFC 1) add questions with respect to a) established environmental, social, labor, and human rights policies and procedures and, b) grievance frameworks and access to remedy, and 2) add the requirement for investors to disclose debarment and community complaint issues.

**OPIC/DFC Response:** The purpose of Aligned Capital is to match those needing capital with those who are interested in providing capital. OPIC/DFC does not prescribe the criteria on which an investor should decide to provide capital. OPIC/DFC does not evaluate any aspect of an Investor's requirements or the merits of an Investee's proposal. The platform was specifically designed to avoid inserting OPIC staff assessments of the parties in order to avoid potential legal liability. In the event that OPIC/DFC supports a project, it would apply its own requirements in these important areas.

OPIC appreciates your comments to the DFC-009 and your engagement on these important issues.

Sincerely,

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