



June 6, 2019

Accountability Counsel – USA
Other Interested Civil Society Organizations and Practitioners

Re: Comments on DFC's Application for Debt Financing (DFC-010)

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 Investee Opt-In (DFC-010), 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-010 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