

Via Electronic Mail

Ms. Catherine F. I. Andrade
Agency Submitting Officer
Overseas Private Investment Corporation
1100 New York Avenue NW
Washington, D.C. 20527

Re: Comments on DFC's Impact Assessment Questionnaire (DFC-007)

Dear Ms. Andrade,

Thank you for the opportunity to comment on the United States International Development Finance Corporation's (DFC) Impact Assessment Questionnaire (DFC-007). DFC-007 will be a key document that DFC will use to initiate the assessment of a project's development impact and ability to comply with environmental and social policies. With the increased legislative mandate in the Better Utilization of Investments Leading to Development (BUILD) Act to prioritize the reduction of gender gaps, it is of the utmost importance that the DFC Impact Assessment Questionnaire includes additional information that will help assess if projects reduce gender gaps.

There are a few key edits that would help improve the ability to assess the reduction of gender gaps. First of all a key revision to the questionnaire to address this is to ensure all responses that are about people are disaggregated by gender. This includes employee counts by classification for current and the five year mark. Additionally, for questions that are about workers' benefits or rights, the questionnaire should also break down those benefits by gender so that it is clear benefits and rights are equally applied. For questions related to compliance with local laws or other labor standards, it would be helpful to add additional language so that in cases where local laws do not have protections for equal treatment for women or prevention of sexual harassment in the workplace, that those labor standards are adhered to even though they are beyond local laws.

Thank you for considering these recommendations, and look forward to continued engagement with DFC to ensure that the agency is a leader in ensuring women are economically empowered and included throughout development finance projects. This will also lead to larger development impacts that benefit communities around the world, and a more prosperous world.

Sincerely,

Aria Grabowski
Senior Policy Advisor, Aid and Development Finance
Oxfam America

cc: The Honorable David Bohigian, Acting President and CEO, OPIC
Mr. Ryan Brennan, Chief Operating Officer, OPIC
Ms. Anne Lesser, Acting Deputy Vice President, Office of Investment Policy