Global Acquisitions
U.S. DEPARTMENT of STATE

JUSTIFICATION FOR OTHER THAN FULL AND OPEN COMPETITION

SECTION 1: IDENTIFICATION OF THE AGENCY AND THE CONTRACTING ACTIVITY

Department of State Contracting Activity	☒ INL/SAO/IM: Embassy Georgetown, Embassy Paramaribo
Requiring Activity	INL/Guyana and INL/Suriname

SECTION 2: NATURE AND/OR DESCRIPTION OF THE ACTION BEING APPROVED

Approval is requested to solicit and award on a sole-source basis for the supplies and/or services described in Section 3 on behalf of the Requiring Activity.

This award is a Firm-Fixed-Price (FFP) with performance-based CLINs. This award shall be one-year base period plus up to two one-year option periods.

SECTION 3: DESCRIPTION OF SUPPLIES/SERVICES REQUIRED TO MEET THE AGENCY'S NEEDS

The Bureau of International Narcotics and Law Enforcement Affairs (INL) seeks to contract a U.S. vendor to collaborate with the Guyana Ministry of Natural Resources, Guyana Geology and Mines Commission, Guyana Gold and Diamond Miners Association, and the Suriname Ministry of Natural Resources to design, implement, and sustain a comprehensive gold traceability application system tracking gold from "pit to port" to prevent illegal and foreign gold from entering legal markets. The vendor shall be responsible for full lifecycle software development, stakeholder training, and ongoing monitoring and evaluation, with phased deployment first in Guyana (base period) then scaled to Suriname (option years). In Guyana, the developed system must integrate into existing proprietary, mission-critical, and legally protected systems currently operating at the MNR, including its Dynamic Digital Interactive Map and Land Information Management System.

Base Year	**Technology and Natural Resources Services**	
CLIN 0001	Guyana Application Development	**Guyana**
CLIN 0002	Guyana Training & Stakeholder Engagement	

CLIN 0003	M&E Framework & Data Support	
CLIN 0004	Program Management & Reporting	
Option Year 1	**Technology and Natural Resources Services**	**Suriname, Guyana**
CLIN 1001	Suriname Application Development (Dutch-language)	
CLIN 1002	Suriname Training & Stakeholder Engagement	
CLIN 1003	Guyana/Suriname M&E & Cross-Border Analysis	
CLIN 1004	Program Management & Reporting	
Option Year 2	**Technology and Natural Resources Services**	**Guyana, Suriname**
CLIN 2001	Platform Sustainment & Enhancement	
CLIN 2002	Advanced Training & Capacity Building	
CLIN 2003	Impact Evaluation & Policy Support	
CLIN 2004	Program Management & Reporting	

The estimated value for the entire period of performance is [redacted] including options, for this justification.

SECTION 4: IDENTIFICATION OF THE STATUTORY AUTHORITY PERMITTING OTHER THAN FULL AND OPEN COMPETITION

This acquisition is conducted under the authority of 41 USC 3304, as implemented by FAR 6.103 and substantiated by the following:

☒ FAR 6.103-1 – Only one responsible source and no other supplies or services will satisfy agency requirements.

SECTION 5: DEMONSTRATION THAT THE PROPOSED CONTRACTOR'S UNIQUE QUALIFICATIONS OR THE NATURE OF THE ACQUISITION REQUIRES USE OF THE AUTHORITY CITED

U.S.-based, active small business Global Ventures Consulting LLC (GV) is uniquely qualified to provide these services based upon the following:

a. GV is the only vendor possessing both required natural resources expertise and the ability to integrate with mandatory proprietary systems without unacceptable risk. The gold traceability application system is not purely a technology development project - it requires

deep integration with Guyana's existing mining sector regulatory framework, understanding of artisanal mining operations in Guyana and Suriname, and established relationships with government counterparts and mining associations. GV possesses deep knowledge and experience in Guyana's mining sector and is currently operating in Guyana under a [redacted] contract implementing Guyana's Mineral Advancement and Prospecting Strategy with the Guyana GGMC and MNR.

b. GV's existing GMAPS contract, successful deployment of the DDIM/LIMS systems, and stakeholder relationships constitute unique capabilities not available from other sources. The Traceability application must integrate with GV's proprietary DDIM and LIMS systems for 1.) mining license verification, 2.) geospatial boundary checking, and 3.) regulatory compliance workflows. GV has already successfully delivered these systems to the Government of Guyana, and these systems are proprietary to GV with closed architecture, mission-critical to daily GGMC/MNR operations, and legally protected intellectual property.

c. While other vendors possess partial capabilities, none can satisfy both natural resources and technology expertise requirements, as well as integrating into existing proprietary systems, without unacceptable technical risk, unnecessary costly timeline delays for the U.S. Government, and split accountability. Any external vendor other than GV would face 3-6 months API negotiation and data-sharing agreement delays with the Government of Guyana, 2-4 months interoperability testing and validation, ongoing dependency on GV cooperation for system updates, single point of failure if GV does not provide timely support, and data integrity risks from mismatched schemas. The technical risk of split vendor accountability is unacceptable for a sensitive law enforcement intelligence system. A brief description of the other vendor deficiencies are as follows:

i. [redacted]**:** Despite proven DRC gold traceability experience and comprehensive technical capabilities, the firm lacks in-country presence in Guyana/Suriname, cannot integrate with mandatory GVC DDIM and LIMS systems, and proposes a physical marker approach requiring specialized equipment unsuitable for artisanal mining contexts.

ii. [redacted]**:** Despite strong Colombian ASM gold formalization experience and Guyana presence, the firm is ineligible as a large business, proposes among the highest pricing at [redacted], relies on unnamed technology subcontractors rather than self-performing development, and cannot integrate with mandatory DDIM and LIMS systems.

iii. [redacted] Despite relevant transnational crime experience and 8(a) eligibility, the firm lacks any mining sector or commodity traceability experience, has no in-country presence, proposes over-scoped pricing

at [redacted] total, and cannot integrate with mandatory DDIM and LIMS systems.

iv. [redacted]**:** Despite regional Caribbean engagement and extensive INL mission expertise, the firm's pricing of [redacted] total is 200-400% higher than competitors, proposes an over-scaled national security C2 platform mismatched to commodity traceability needs, lacks direct ASM gold experience, and cannot integrate with mandatory DDIM and LIMS systems.

v. [redacted]**:** Despite SDVOSB certification and competitive pricing, the firm has no gold traceability or mining sector experience, operates with only a two-person core team lacking bench strength, has no in-country presence, and cannot integrate with mandatory DDIM and LIMS systems.

vi. [redacted]**:** Despite cost-effective federal pricing and analytics capabilities, the organization lacks mobile application development experience, mining sector background, regional presence, operational deployment capacity, did not provide pricing, and cannot integrate with mandatory DDIM and LIMS systems.

vii. [redacted]**:** Despite sophisticated enforcement analytics and ASM academic expertise, the firm lacks demonstrated gold sector experience, has no regional presence, cannot integrate with mandatory DDIM and LIMS systems, proposes unsustainable pricing at [redacted] total, and has not identified critical NGO training partners.

viii. [redacted]**:** Despite exceptional in-country presence in both Guyana and Suriname with established government relationships and gold sector operations, the consortium's pricing of [redacted] total represents a 300-600% premium without commensurate differentiation, cannot integrate with mandatory DDIM and LIMS systems, and presents coordination complexity across six partners.

ix. [redacted]**:** Despite direct Guyana/Suriname presence and political economy expertise, the consortium proposes building a custom platform from scratch introducing significant technical risk, cannot integrate with mandatory DDIM and LIMS systems, lacks organizational depth for sustained deployment, and offers insufficient cost advantage at [redacted] to justify execution uncertainty.

x. [redacted]**:** Despite an existing Gold Board/GGMC contract and in-country presence, the firm presents an undisclosed mine-site technology partner under NDA preventing capability verification, provides no AXIS implementation metrics despite a 2019 contract, has very small organizational capacity, cannot integrate with mandatory DDIM and LIMS systems, and lacks international development program experience.

xi. [redacted]**:** Despite regional development credentials, PADF demonstrates limited technical capability with no identified

technology partner for core system development, proposes significantly underestimated pricing at [redacted], recommends changing to cooperative agreement misaligned with INL's acquisition strategy, and cannot integrate with mandatory DDIM and LIMS systems.

xii. [redacted]**:** Despite competitive pricing at [redacted] and strong federal IT credentials, the firm has no extractives sector or commodity traceability experience, no international development background, no regional presence, cannot integrate with mandatory DDIM and LIMS systems, and proposes building an entirely custom platform representing the highest technical development risk.

xiii. [redacted]**:** Despite direct INL experience and Suriname presence through GISsat's Esri partnership, the firm has no extractives sector experience, proposes an Esri platform creating vendor lock-in challenging sustainability, cannot integrate with mandatory DDIM and LIMS systems, provides over-scoped pricing at [redacted], and takes a technology-centric approach with insufficient emphasis on informal sector adoption challenges.

xiv. [redacted]**:** Despite federal security compliance credentials and DOS contract experience, the firm has no international development experience, lacks regional presence in Guyana/Suriname, has no confirmed teaming partners for development or M&E expertise, cannot integrate with mandatory DDIM and LIMS systems, and possesses no mining sector or commodity traceability experience.

xv. [redacted]**:** Despite exceptional extractives sector expertise and proven ASM engagement across multiple countries, the firm has no demonstrated USG contract performance, lacks federal contracting infrastructure with UEI/CAGE "to be applied for," cannot integrate with mandatory DDIM and LIMS systems, proposes among the medium costs at [redacted], and presents technology delivery uncertainty without comparable government traceability system performance.

xvi. [redacted]**:** Despite production-scale platform maturity processing 43 billion supply chain events, the firm has no international deployment experience beyond domestic US markets, no developing country or donor-funded program experience, cannot integrate with mandatory DDIM and LIMS systems, has no regional presence, did not provide pricing, and lacks informal ASM sector engagement capabilities.

xvii. [redacted]**:** Despite extensive traceability portfolio across 20 countries and direct CAR gold sector experience proposes among the medium costs at [redacted], cannot integrate with mandatory DDIM and LIMS systems, and raises feasibility concerns by questioning the "each gram" certification requirement and one-year timeline suggesting scope misalignment.

d. GV offered the most cost-effective ([redacted] Base Year; [redacted] for base contract plus 3 option years) among all vendors providing detailed

estimates. This sole source approach provides the best value by eliminating between an estimated [redacted] in API negotiation and integration costs, the technical risk of split vendor accountability, stakeholder relationship development costs, and 5-10 months of unnecessary schedule delays which would affect INL's counter transnational crime objectives and program effectiveness.

SECTION 6. DESCRIPTION OF EFFORTS TO ENSURE THAT OFFERS WERE SOLICITED FROM AS MANY POTENTIAL SOURCES AS IS PRACTICABLE, INCLUDING WHETHER A NOTICE WAS OR WILL BE PUBLICIZED AS REQUIRED BY FAR SUBPART 5.2 AND, IF NOT, WHICH EXCEPTION UNDER FAR 5.201 APPLIES

On April 24, 2026, INL posted a Request for Information/Sources Sought Notice on SAM.gov. The RFI/SSN produced 18 vendor responses from diverse vendor categories, including small businesses (SDVOSBs, WOSBs), large contractors, NGOs, and specialized technology firms. The RFI responses revealed variation in pricing, with estimated total costs ranging from [redacted] across base and three option years, though most proposals clustered in the [redacted]. Three dominant technical architectures emerged from respondents: mobile-first offline-capable applications designed for connectivity-constrained mining regions, blockchain-based certification systems providing tamper-evident digital records, and AI/analytics-enhanced traceability platforms with anomaly detection capabilities. The Government of Guyana identified a critical integration requirement that significantly constrains competitive options - any selected solution must integrate with proprietary Global Ventures Consulting LLC systems currently operating at the Guyana Ministry of Natural Resources, fundamentally altering the technical feasibility landscape and potentially eliminating vendors whose proposed architectures cannot accommodate this mandatory integration.

SECTION 7. DETERMINATION BY THE CONTRACTING OFFICER THAT THE ANTICIPATED COST TO THE GOVERNMENT IS FAIR AND REASONABLE

The Contracting Officer has determined the anticipated [redacted] to the Government of the supplies/services covered by this J&A will be fair and reasonable based on independent government cost estimate, market prices, and price analysis. By signing the justification, the Contracting Officer makes a determination that the [redacted] to the Government is expected to be fair and reasonable. Following the RFI/SSN, INL reduced the project contract period from base and three years to a contract period of base and two years for the anticipated cost of supplies/services [redacted].

SECTION 8. DESCRIPTION OF THE MARKET RESEARCH CONDUCTED (SEE PART 10) AND THE RESULTS OR A STATEMENT OF THE REASON MARKET RESEARCH WAS NOT CONDUCTED

On April 24, 2026, INL's Implementing Mechanism Division (IMD) posted a Request for Information/Sources Sought Notice on SAM.gov for this Scope of Objectives. The RFI closed on Friday, May 1, 2026 at 1700. INL IMD Contract Specialist compiled the results and produced a market research report, which was provided to the INL Program Office. In addition, prior to this RFI/SSN, the Program Office and COR conducted market research to produce an initial IGCE informing the SOO and held several program design discussions with the Government of Guyana, Ministry of Natural Resources, Surinamese Ministry of Natural Resources, U.S. Embassy Georgetown, and U.S. Embassy Paramaribo.

While market research and the RFI/SSN revealed strong interest and diverse capabilities from 18 vendors, the unique combination of requirements - natural resources domain expertise within Guyana's specific context plus mandatory integration with proprietary GV systems - can only be satisfied by Global Ventures Consulting LLC. Competitive procurement would introduce unacceptable, technical integration risks, operational disruption to mission-critical government systems, and timeline delays, making the sole source award the only viable procurement strategy to achieve program objectives within the required timeframe. No other vendor can integrate with proprietary GV DDIM and LIMS systems. In addition to this technical requirement, the below market research analysis outlines additional disqualifying justification for each vendor which responded in the RFI:

- While [redacted] offers proven ASM gold traceability experience through successful pit-to-export implementation in [redacted] under [redacted], unique physical product verification capabilities with on-product markers addressing material substitution fraud, comprehensive integrated [redacted] platform with offline-first design for remote mining regions, and structured train-the-trainer capacity building infrastructure, the firm lacks established presence in Guyana or Suriname with no demonstrated relationships with GGMC, MNR, or Gold Board stakeholders, cannot integrate with the mandatory proprietary GVC DDIM and LIMS systems without extensive API negotiation and interoperability testing delays, and their physical marker deployment approach requiring specialized equipment and laboratory detection capability introduces adoption complexity and ongoing operational dependencies unsuitable for artisanal mining contexts. These fundamental gaps in in-country presence, mandatory system integration capability, and operational simplicity for informal sector adoption outweigh their strong [redacted] gold sector credentials and technical platform maturity, making them unsuitable for this contract requirement.

- While [redacted] offers proven ASM gold formalization experience through [redacted] and [redacted] programs in [redacted], deep supply chain standards expertise with GS1-compliant traceability across [redacted] global health programs, registered presence in Guyana with active LAC programming, and realistic phased maturity implementation approach starting at licensed transaction points, the firm's large business status makes them ineligible for small business set-asides, their [redacted] pricing is among the highest submitted, they do not self-perform software development and rely on unnamed technology subcontractors, their conventional database architecture lacks blockchain/DLT immutability capabilities, they cannot integrate with mandatory proprietary DDIM and LIMS systems, and their conservative standards-based methodology lacks enforcement-specific features like anomaly detection and illicit network flagging. These fundamental disadvantages in small business eligibility, cost competitiveness, direct technical delivery capability, mandatory system integration, and law enforcement-oriented functionality outweigh their strong [redacted] gold sector credentials and institutional capacity building experience, making them unsuitable for this contract requirement.

- While [redacted] offers transnational crime experience through a [redacted] contract supporting cross-border criminal network investigations directly relevant to illicit gold flows, threat intelligence capability from PFPA contracts, 8(a) eligibility for streamlined procurement, and a hybrid technology approach leveraging commercial QR platforms with custom enforcement logic, the firm has no mining sector, ASM, or commodity traceability experience, lacks established presence and relationships in Guyana or Suriname, proposes higher over-scoped pricing at [redacted] base year and [redacted] total program, cannot integrate with mandatory proprietary DDIM and LIMS systems, and their enforcement-focused authenticated device ecosystem with cryptographic provisioning may exceed artisanal miner adoption capacity while inadequately addressing miner incentivization critical for informal sector compliance. These fundamental gaps in extractives sector expertise, in-country operational presence, cost competitiveness, mandatory system integration capability, and stakeholder adoption strategy outweigh their strong law enforcement and intelligence credentials, making them unsuitable for this contract requirement.

- While [redacted] offers active regional engagement in the Southern Caribbean supporting government security and intelligence initiatives providing real-time stakeholder access, extensive INL mission expertise with 640+ projects across 107 countries including EXBS border security programs, enterprise-grade Digital Shield platform with NIST 800-53 and Zero Trust Architecture alignment appropriate for enforcement intelligence, and [redacted] Barbados-based

Caribbean government partnerships, the firm's proposed pricing of [redacted] base year and [redacted] total program is 200-400% higher than competitive alternatives representing the highest cost submission, their national security-grade C2 platform designed for large-scale interagency coordination represents significant scale mismatch and complexity exceeding focused commodity traceability requirements, they lack direct ASM gold sector implementation experience and propose integrating third-party platforms ([redacted]) rather than purpose-built solutions, and they cannot integrate with mandatory proprietary DDIM and LIMS systems. These fundamental disadvantages in cost competitiveness, solution appropriateness, gold sector expertise, and mandatory system integration capability outweigh their strong regional security credentials and INL program experience, making them unsuitable for this contract requirement.

- While [redacted] offers Service-Disabled Veteran-Owned Small Business certification, competitive pricing (Base year [redacted], total program [redacted]), and innovative technical capabilities including biometric fraud prevention and AI behavioral analytics, the firm's complete absence of necessary gold traceability or mining sector experience, two-person core team is delivery focused without bench strength for technical capabilities, lack of established presence in Guyana or Suriname, cannot integrate with mandatory proprietary DDIM and LIMS systems, and unproven federal program management capabilities create unacceptable execution risk making them unsuitable for this specialized contract requirement.

- While the [redacted] offers cost-effective federal pricing structures, proven data extraction and analytics capabilities, and advanced dashboard visualization expertise that aligns well with monitoring and evaluation needs, the organization lacks the necessary mobile application development experience, has no mining sector or commodity traceability background, did not provide a price proposal for this requirement, maintains no regional presence in Guyana or Suriname, demonstrated capacity for in-person workshops, miner onboarding, or train-the-trainer programs in remote mining regions, they cannot integrate with mandatory proprietary DDIM and LIMS systems, and operates with a research-focused mission rather than operational system deployment capacity. These fundamental gaps create unacceptable execution risks making them unsuitable for this specialized contract requirement.

- While [redacted] offers enforcement-calibrated analytics with proven [redacted] methodology detecting concealed supply chain dependencies, ASM academic expertise through [redacted] peer-reviewed research, and sophisticated cross-border

flow detection capabilities applicable to gold smuggling patterns, the firm lacks the necessary demonstrated gold sector or commodity traceability experience, has no established regional presence in Guyana or Suriname, cannot integrate with mandatory proprietary DDIM and LIMS systems, requires team expansion through uncertain dual-track hiring/subcontracting for mobile application development, provided an unsustainable and over-scoped price (base year [redacted], total program [redacted]), and has not yet identified critical [redacted] training partners for stakeholder engagement under this requirement.

- While [redacted] leads a qualified consortium with gold sector operations, has active teams operating in both Guyana and Suriname with established government relationships, enterprise-grade technology partners, and intelligence capabilities for illicit network analysis, their proposed cost structure of [redacted] base year and [redacted] total program represents [redacted] premium over competitive alternatives without commensurate technical differentiation and cannot integrate with mandatory proprietary DDIM and LIMS systems, while their six-partner consortium creates coordination complexity and their operational focus rather than software development expertise introduces technology integration risk across multiple platforms. These fundamental disadvantages in cost-effectiveness and structural complexity outweigh their exceptional in-country presence and gold sector credentials, making them unsuitable for this contract requirement given budgetary constraints and the availability of more streamlined technical solutions.

- While [redacted] offers direct Guyana and Suriname presence through PDC's Georgetown headquarters with continuous operations since 2014, political economy expertise in extractives sector compliance incentive design, federal platform experience through Informatics Studio's 30+ years delivering digital solutions for DOS and USAID, and a user-validated lean startup methodology with realistic adoption strategies addressing informal market dynamics, the consortium's decision to build a custom platform from scratch rather than leverage existing production systems introduces significant technical development risk, cannot integrate with mandatory proprietary DDIM and LIMS systems, their lean team structure lacks the depth and bench strength for sustained multi-year multi-country deployment, they have limited federal contracting infrastructure without GSA Schedule or GWAC vehicles, and their mid-range [redacted] pricing does not offer sufficient cost advantage to justify the elevated execution uncertainty. These fundamental disadvantages in technical risk mitigation, operational capacity, and procurement readiness outweigh their in-country presence and contextual expertise, making them unsuitable for this contract

requirement given the availability of more proven, production-ready technology solutions.

- While [redacted] offers advantages including an existing Government of Guyana contract for the [redacted] with the Gold Board and GGMC, pre-established stakeholder relationships from 2016-2019 consultations, in-country presence through the [redacted], intelligence-led compliance architecture that cross-references production data to detect under-declaration, and competitive mid-range pricing of [redacted] reflecting existing platform baseline, the firm presents critical uncertainties including an undisclosed mine-site technology partner operating under NDA that prevents verification critical capabilities, unclear [redacted] implementation status with no adoption metrics or operational data provided despite the 2019 contract, very small organizational capacity that raises questions about sustained [redacted] country deployment capability, cannot integrate with mandatory proprietary DDIM and LIMS systems, and no demonstrated experience on donor-funded international development programs or M&E frameworks typical of State/INL requirements. These fundamental gaps in technology partner transparency, proven operational performance data, organizational depth, and international development experience create unacceptable verification and execution risk that outweighs their in-country positioning and existing government relationships, making them unsuitable for this contract requirement without substantial additional due diligence and capability confirmation.

- While [redacted] offers strong regional development credentials and cooperative agreement expertise typical of foreign assistance initiatives, their response demonstrates limited technical capability with minimal detail on software development or digital platform delivery, fails to identify any technology partner or subcontractor for the core Objective 1 traceability system development, proposes a [redacted] price estimate that is significantly underestimated for full-scope software development, deployment, training, and M&E across two countries over four years. Additionally, [redacted] recommends changing the procurement mechanism from fixed-price contract to cooperative agreement which does not align with INL's acquisition strategy and cannot integrate with mandatory proprietary DDIM and LIMS systems. These fundamental gaps in technical capacity, platform architecture definition, realistic cost estimation, and procurement approach alignment outweigh their foreign assistance sector experience, making them unsuitable for this specialized digital traceability contract requirement.

- While [redacted] *offers* active DOS contractor status with current performance at [redacted] and completed [redacted], strong technical leadership with 20+ years federal IT experience including TOGAF certification, realistic offline-first PWA design appropriate for connectivity constraints, and the most competitive pricing at [redacted] total among vendors providing detailed estimates, the firm has no necessary demonstrated extractives sector or commodity traceability experience, no international development program or capacity building background beyond construction and IT procurement contracts, no established presence in Guyana, Suriname, or the Caribbean region, cannot integrate with mandatory proprietary DDIM and LIMS systems, and proposes building an entirely custom platform from scratch which represents the highest technical development risk among all respondents. These fundamental gaps in mining sector expertise, in-country operational capacity, international development experience, and proven traceability platform delivery outweigh their cost advantages and federal compliance credentials, making them unsuitable for this specialized artisanal mining traceability contract requirement.

- While [redacted] offers direct INL experience with a [redacted] analogous law enforcement digital platform program in [redacted], established in-country presence through GISsat's Suriname Esri partnership with Ministry of Natural Resources relationships, native Dutch capability through [redacted], proven production-grade [redacted] platform designed for offline field environments, and federal quality credentials including zero-defect DOS OIG audits with CMMI Level 3 and ISO certifications, the firm has no demonstrated extractives sector or commodity traceability experience, proposes an Esri platform that creates vendor lock-in and ongoing licensing costs challenging long-term sustainability, cannot integrate with mandatory proprietary DDIM and LIMS systems, provides an over-scoped price [redacted] total, base + 2 options), takes a technology-centric approach with insufficient emphasis on political economy and informal sector adoption challenges critical to artisanal mining contexts, and partners with [redacted] whose M&E background is in social services rather than extractives or law enforcement. These fundamental gaps in mining sector expertise, sustainable technology architecture, informal economy incentive design, and specialized extractives M&E capability outweigh their strong federal IT credentials and in-country presence, making them unsuitable for this artisanal gold traceability contract requirement.

- While [redacted] offers direct DOS contract experience with cloud architecture and integration services, federal security compliance credentials including FedRAMP High-aligned Azure architectures and NIST 800-53 implementation, offline-first

mobile architecture with Azure Key Vault-managed encryption appropriate for connectivity-constrained environments, and SDB socioeconomic status supporting small business contracting goals, the firm has no demonstrated international development experience or Caribbean/Latin American operations, lacks established presence in Guyana or Suriname critical for stakeholder engagement and sustainability, has no confirmed teaming partners for international development or M&E expertise despite ongoing discussions, cannot integrate with mandatory proprietary DDIM and LIMS systems,and possesses no mining sector, artisanal mining community, or commodity traceability experience. These fundamental gaps in regional presence, international development capacity, established partnerships, and extractives sector expertise outweigh their federal IT security credentials and DOS relationship, making them unsuitable for this artisanal gold traceability contract requirement.

- While [redacted] offers extractives sector expertise with 20+ years in conflict minerals and responsible sourcing under [redacted], proven ASM engagement through [redacted] demonstrating understanding of informal mining dynamics, comprehensive threat analysis of Guyana/Suriname gold sector political economy including Venezuelan criminal networks, and a strong M&E framework with clear KPIs and adaptive management protocols, the firm has no demonstrated USG contract performance with experience limited to multilateral organizations and private sector, lacks federal contracting infrastructure with UEI/CAGE listed as "to be applied for" which may delay contract award, cannot integrate with mandatory proprietary DDIM and LIMS systems, proposes an over-scoped cost estimate of [redacted] among the highest submitted, and presents technology development uncertainty with no specific past performance on comparable government traceability system delivery at this scale despite digital platform experience. These fundamental gaps in federal contracting experience, procurement readiness, cost competitiveness, and proven USG technology delivery outweigh their exceptional extractives sector credentials and [redacted] community engagement expertise, making them unsuitable for this contract requirement.

- While [redacted] offers production-scale platform maturity with 15 years continuous operation processing [redacted] supply chain events across 29 government authorities and 500,000+ users, multi-jurisdictional governance capabilities directly applicable to Guyana/Suriname bilateral deployment, and a rapid deployment timeline with Month 3 POC credibility based on existing infrastructure, the firm has no international deployment experience as all production operations are limited to domestic US markets, no demonstrated experience in international development, donor-funded

programs, or capacity building in emerging economies, cannot integrate with mandatory proprietary DDIM and LIMS systems, no established presence in Guyana, Suriname, or the Caribbean region, did not provide a pricing estimate, and unproven stakeholder adoption capabilities for informal ASM sectors with low digital literacy that differ fundamentally from their regulated developed-market client base. These fundamental gaps in international operations, developing country context, regional presence, and informal sector engagement outweigh their domestic platform credentials and technical maturity, making them unsuitable for this artisanal gold traceability contract requirement.

- While [redacted] offers extensive traceability portfolio with 10 supply chain platforms delivered across multiple commodities in 20 countries, direct gold sector experience through the [redacted], comprehensive multi-disciplinary technical capability including blockchain specialists and anti-corruption experts, and Caribbean presence with 22 offices across 11 LAC countries demonstrating regional operational capacity their higher over-scoped cost estimate of [redacted] is among the highest submitted, their large organizational structure creates complexity and bureaucracy risks compared to more agile vendors, and [redacted] itself raises feasibility concerns by questioning the "each gram of gold" certification requirement and one-year delivery timeline which suggests they view the scope as requiring significant adjustment. They cannot integrate with mandatory proprietary DDIM and LIMS systems. These fundamental disadvantages in small business eligibility, cost competitiveness, organizational agility, and alignment with the stated scope and timeline outweigh their impressive global credentials and proven traceability experience, making them unsuitable for this contract requirement.

SECTION 9. ANY OTHER FACTS SUPPORTING THE USE OF OTHER THAN FULL AND OPEN COMPETITION

This request is not due to the lack of a performance specification, technical data package, specifications, engineering descriptions, a statement of work, or a purchase description suitable for full and open competition.

SECTION 10. LISTING OF THE SOURCES, IF ANY, THAT EXPRESSED, IN WRITING, AN INTEREST IN THE ACQUISITION

The vendor sources that have written to express interest in the acquisition during the RFI/SSN include:

- [redacted]
- [redacted]

- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]

FAR 6.103-1 applies, Section 8 (above) outlines the justifications for why the sources other than Global Venture Consulting LLC fail to meet the requirements for this award and should be rejected.

A synopsis was issued in System for Award Management (SAM) on 04/10/2026, requesting that parties express their interest in writing to the Contracting Officer. The companies listed above responded.

SECTION 11. STATEMENT OF THE ACTIONS, IF ANY, THE AGENCY MAY TAKE TO REMOVE OR OVERCOME ANY BARRIERS TO COMPETITION BEFORE ANY SUBSEQUENT ACQUISITION FOR THE SUPPLIES OR SERVICES REQUIRED

This is a one-time buy. Once the traceability system is operational, functional, and implemented with the Ministry of Natural Resources under this award's three year period, INL will shift to the Guyana and Suriname governments any future costs to maintain, add capability, or provide troubleshooting assistance for the system.

SECTION 12. CERTIFICATIONS

All reviews and approvals should be completed in the order listed unless otherwise authorized or required.

TECHNICAL AND REQUIREMENTS CERTIFICATION

I certify that the facts and representations under my cognizance which are included in this Justification and its supporting acquisition planning documents, except as noted herein, are complete and accurate to the best of my knowledge and belief.

[redacted]

[redacted]

[redacted]

[redacted]

LEGAL SUFFICIENCY REVIEW

This J&A is hereby determined to be legally sufficient.

[redacted]

[redacted]

CERTIFICATIONS (Continued)

CONTRACTING OFFICER CERTIFICATION (FAR 6.104-1(a)(12))
I certify that this submission is accurate to the best of my knowledge, and that it contains complete information necessary to enable other officials to make an informed recommendation for approval or disapproval.

[redacted]

[redacted]

[redacted]

SECTION 13. APPROVALS

COMPETITION ADVOCATE

[redacted]

[redacted]