



Environmental and Social Management System (ESMS)

March 2026

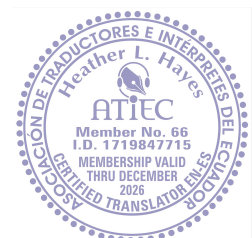


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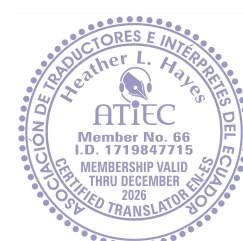
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Acronyms

NEA	National Environmental Authority
BCA	Biocorredor Amazónico
IDB	Inter-American Development Bank
IFC	International Finance Corporation
DFC	U.S. Development Finance Corporation
SEE	Specialized Executor
GEF	Global Environment Facility
CPLI	Free, Prior and Informed Consultation
GCF	Green Climate Fund
MARR	Grievance Redress Mechanism
CN	Concept Note
ESAP	Environmental and Social Action Plan
BAP	Biodiversity Action Plan
GAP	Gender Action Plan
ALAP	Alternative Livelihoods Action Plan
SAP	Stakeholder Engagement Plan
ESMS	Environmental and Social Management System
TNC	The Nature Conservancy
TAU	Public Sector Technical Advisory Unit

Glossary of Terms

Activity: A set of actions, interventions, or specific tasks financed in whole or in part by the BCA Fund, implemented within the framework of a project or grant.

National Environmental Authority (NEA): Ecuadorian State entity with jurisdiction over environmental matters, responsible for policy formulation, regulation, environmental planning, and oversight, including implementation of the Amazonian Biocorridor Program.

Beneficiaries: Individuals, communities, peoples, Indigenous nationalities, or organizations that receive direct or indirect benefits from activities financed by the BCA Fund.

Biocorredor Amazónico (BCA): A territorial and ecological management model aimed at maintaining the functional connectivity of Ecuador’s Amazonian ecosystems, strengthening the collective rights of Indigenous peoples and nationalities, and promoting sustainable development in the Amazon Basin.

Facilitated Consultation with a Consent Agreement: Process through which communes, communities, peoples or indigenous nationalities, guided by the proponent or Executor of a project, express their agreement, acceptance, or explicit affirmative willingness to participate in an initiative or project to be financed by the BCA Fund. This process must be accompanied by a representative of the National Environmental Authority, serving as the facilitation guarantor.

Executor: Public or private entity that, once the grant agreement with the BCA Fund is signed, is responsible for the technical, financial, environmental, and social implementation of the financed project.



Specialized Executor (SEE): Private sector entity that, in public sector projects, signs the grant agreement with the BCA Fund and assumes responsibility for project implementation and administration, and for compliance with the project’s environmental and social requirements.

Environmental and Social Assessment: Systematic process for identifying, analyzing, and assessing potential or actual environmental and social risks and impacts associated with a project, in accordance with the IFC Performance Standards and ESMS procedures.

Fondo del Biocorredor Amazónico (BCA Fund): Nonprofit entity responsible for managing, allocating, and overseeing financial resources intended for the implementation of the Biocorredor Amazónico Program and for fulfilling the Conservation Commitments.

Groups in vulnerable situations: Persons or groups who, for social, economic, cultural, gender, age, disability, or other contextual reasons, may face higher risks of exclusion, discrimination, or adverse impacts resulting from the financed activities.

Exclusion List: List of activities that the BCA Fund does not finance under any circumstances, due to their potential to generate unacceptable environmental or social impacts, in accordance with the ESMS and applicable international commitments.

Grievance Redress Mechanism (MARR): An accessible, transparent, and culturally appropriate system established by the BCA Fund to receive, register, assess, and resolve grievances related to the activities financed.

IFC Performance Standards: Set of environmental and social standards developed by the International Finance Corporation that serve as the primary reference framework for the BCA Fund’s ESMS.

Concept Note (CN): Preliminary document submitted by a proponent that provides a concise description of the project proposal, used for an initial assessment of eligibility and strategic alignment.

Environmental and Social Action Plan (ESAP): Management instrument that sets out mitigation measures, responsibilities, timeline, and indicators to address the identified environmental and social risks and impacts.

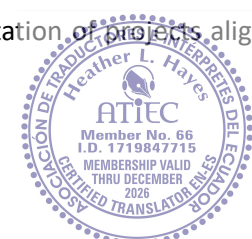
Biocorredor Amazónico Program (PBCA): National initiative led by the Government of Ecuador that establishes the strategic, institutional, and territorial framework for the conservation and sustainable development of the Ecuadorian Amazon.

Project: A structured set of activities financed through a BCA Fund grant, with defined objectives, budget, timeline, and responsibilities.

Environmental and social safeguards: Set of principles, standards, and procedures intended to prevent, mitigate, and manage the environmental and social risks and impacts associated with financed projects.

Environmental and Social Management System (ESMS): Institutional, regulatory, and procedural framework of the BCA Fund intended to ensure that funded activities are designed, implemented, and supervised in an environmentally and socially responsible manner.

Grant: Financial contribution provided by the BCA Fund for the implementation of projects aligned with its strategic objectives, with no expectation of repayment.



1. Introduction

1.1 About the BCA Fund

1. The Fondo del Biocorredor Amazónico (hereinafter, the BCA Fund) is a strategic financial mechanism established to ensure stable, transparent, and long-term financing for the conservation, ecological restoration, and sustainable development of the Ecuadorian Amazon, specifically the Biocorredor Amazónico.
2. The BCA Fund was established as a nonprofit, non-stock corporation, incorporated in the State of Delaware, United States of America, and organized and operated for charitable, educational, and scientific purposes, in accordance with its Certificate of Incorporation and Bylaws. It was legally established in Ecuador through the signing of the Basic Operating Agreement with the Ministerio de Relaciones Exteriores y Movilidad Humana (Ministry of Foreign Affairs and Human Mobility) on July 1, 2025, which enables it to operate in the country and administer resources earmarked for the conservation of the Ecuadorian Amazon.
3. The BCA Fund is part of the Biocorredor Amazónico Program, a national initiative aimed at maintaining ecological connectivity, strengthening the collective rights of Indigenous peoples and nationalities, and promoting sustainable territorial management models in Ecuador's Amazon Basin.
4. In this context, the BCA Fund channels resources from the debt-for-nature swap completed by the República del Ecuador at the end of 2024 for the Biocorredor Amazónico, with the objective of supporting the implementation of the Conservation Commitments undertaken by the Ecuadorian State, thereby ensuring sustained environmental, social, and economic benefits over time. Through its governance structure, it seeks to ensure:
 - Long-term financial stability and sustainability through innovative mechanisms.
 - Transparency and participation in decision-making.
 - Efficient investment in initiatives that contribute to conserving Amazon ecosystems and strengthening the capacity to manage Indigenous territories.

1.2 Objectives and scope of the ESMS

5. The Environmental and Social Management System (ESMS) of the BCA Fund is established as a key instrument to ensure that activities financed by the Fund are designed and implemented in an environmentally and socially responsible manner, in accordance with applicable national legislation, the international commitments undertaken by Ecuador, and the guiding principles of the BCA Fund.
6. The ESMS complements the existing policies and manuals of the BCA Fund and complies with Ecuador's national laws and regulations. It is designed to align with the environmental and social safeguard frameworks of partner organizations, donors, and financiers,¹ as well as with international guidelines and best practices. This ESMS is based on and aligned with the International Finance Corporation (IFC) Performance Standards, as well as with other international frameworks (IDB, TNC, DFC) and Ecuador's legal framework, including the provisions of the

¹For example, TNC, the U.S. International Development Finance Corporation (DFC), and the Inter-American Development Bank (IDB).



Constitution, ILO Convention 169, and national regulations on collective rights and environmental management.

7. Together with the BCA Fund operations and grants manuals, the ESMS defines the procedures, tools, and responsibilities for assessing, managing, and monitoring the environmental and social risks and impacts associated with activities supported by the BCA Fund throughout the project cycle. The objective of the ESMS is to ensure that adverse environmental and social impacts are identified and avoided or, if it is not possible to avoid them completely, mitigated in accordance with the mitigation hierarchy, and that mitigation measures are adequately documented. The ESMS is also designed to ensure that activities financed by the BCA Fund maximize benefits for local communities and promote high levels of participation and transparency.
8. The ESMS is intended to be a “living document” that will be updated periodically to reflect the latest experiences and lessons learned from financed projects. The ESMS applies to all activities financed by the BCA Fund.
9. **The objective of the ESMS is to ensure that environmental and social risk management is carried out in a simple and efficient manner, commensurate with the scope of the activities and the financing of the BCA Fund, and taking into account the capacities of the BCA Fund Executive Management and potential implementing entities.** In line with this objective, the ESMS environmental and social management procedure has been designed to be implemented in 10 clear and practical steps, using standardized tools that will guide the BCA Fund and proponents and implementing entities in identifying and formulating risks, mitigation measures, and monitoring their implementation.
10. The ESMS requirements are mandatory for all activities of the BCA Fund and apply to both the Fund’s technical staff and the Executors and partners involved in implementing projects financed by the BCA Fund.

2. Overview of the BCA Fund

2.1 Background

11. The Ecuadorian Amazon is one of the most biologically and culturally diverse regions on the planet, home to a wide range of ecosystems and endemic species, as well as indigenous peoples and nationalities² that have safeguarded their territories for generations. The BCA Fund is an integral part of the Biocorredor Amazónico Program, conceived as a strategic response to the growing threats facing the Ecuadorian Amazon, including deforestation, biodiversity loss, ecosystem fragmentation, and the impacts of climate change.
12. The establishment of the BCA Fund is directly linked to the Conservation Commitments established under the debt-for-nature swap signed by the Republic of Ecuador and its financial and conservation partners. These commitments include clear targets related to expanding areas covered by in situ conservation mechanisms, ecosystem restoration, strengthening Indigenous territorial governance, environmental monitoring, and promoting the sustainable use of biodiversity.
13. As the financial arm of the Biocorredor Amazónico Program, the BCA Fund channels resources to strategic projects that contribute to meeting these Conservation Commitments, ensuring that all

²It will refer to the eleven nationalities established in the legal documents of the BCA debt-for-nature financial debt conversion operation.



funded activities align with BCA principles and are implemented in accordance with criteria of sustainability, transparency, and respect for collective rights and the sociocultural diversity of the Amazon territory.

2.2 Institutional arrangements

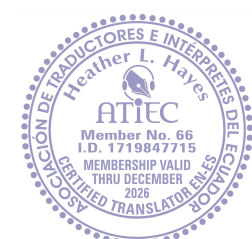
14. The BCA Fund has a clearly defined institutional and governance structure aimed at ensuring the efficient, transparent, and technically sound management of financial resources. It is governed by its Board of Directors³ and managed by an Executive Management led by an Executive Director.⁴ The Fund's activities are overseen by its Board of Directors and implemented by the Executive Management of the BCA Fund.
15. The Board of Directors is the Fund's highest decision-making body and is responsible, among other functions, for approving the award of grants, based on the recommendations of the Technical Committee. It oversees compliance and accountability and approves disbursements. It decides to suspend financing if any Executor, including government agencies, fails to meet any of the disbursement conditions.
16. The BCA Fund Technical Committee provides specialized technical guidance and advice, ensuring that funded projects are aligned with the BCA Fund's strategic objectives, conservation commitments, and applicable environmental and social principles.
17. The Executive Management manages activities financed by the BCA Fund, including the award of grants to governmental and non-governmental entities. It prepares annual work plans and budgets for its own operations, coordinates the selection and approval of grants, ensures compliance with grant agreements, applicable laws and regulations, and the ESMS, carries out comprehensive monitoring and evaluation and reporting functions, and publishes annual implementation reports. The BCA Fund Operational Manual further details the roles and responsibilities of members of the Executive Management.
18. The Executive Director serves as the legal representative of the BCA Fund and is responsible for the overall management of operations, including oversight of the implementation of policies, procedures, and systems, such as the ESMS.
19. The Fund's Environmental and Social Safeguards Specialist, as a member of the Executive Management, is responsible for the implementation of the ESMS.
20. Furthermore, the Biocorredor Amazónico Program plays a key technical assistance role, providing specialized support on strategic planning, environmental and social standards, and institutional development. This assistance helps strengthen capacities and ensures that strategic and operational decisions align with the Conservation Commitments undertaken by the country.

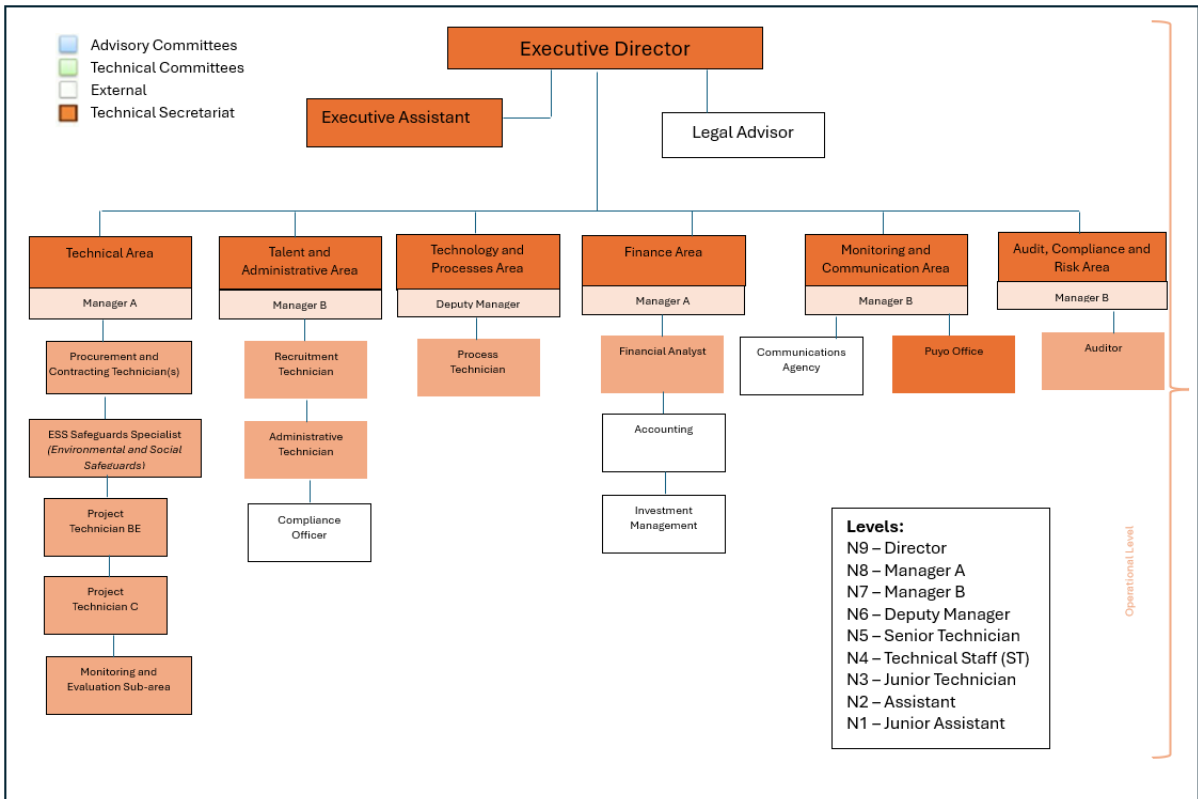
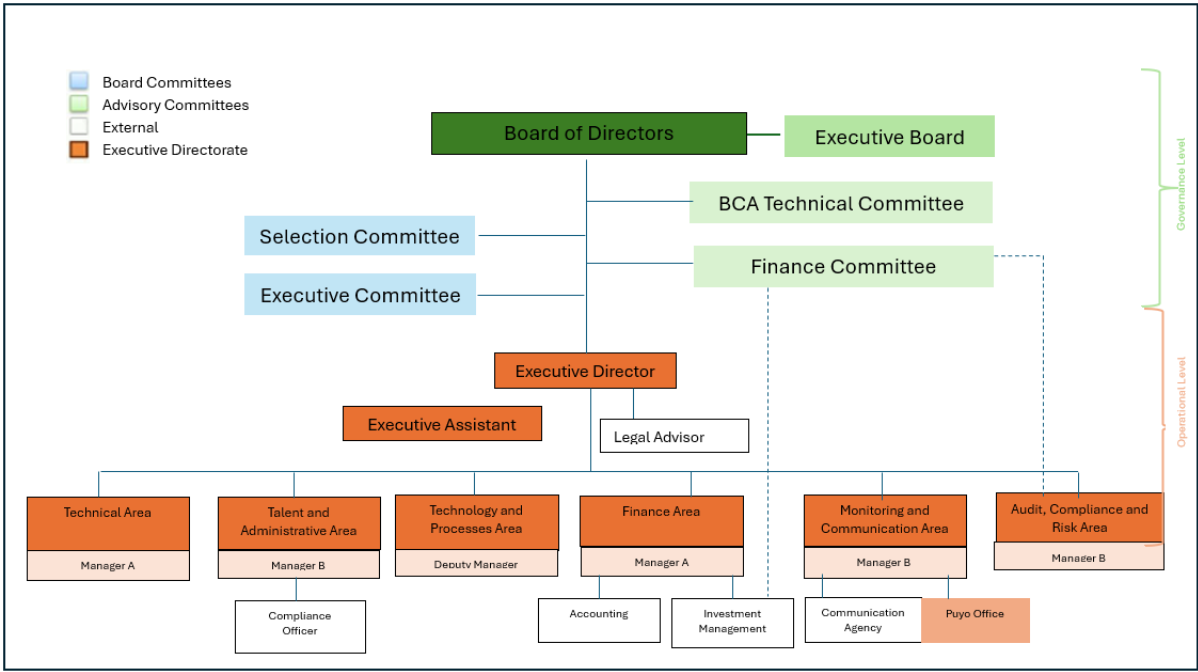
Figure 1. Organizational charts of the BCA Fund.⁵

³Statutes of the BCA Fund, Article IV, dated November 20, 2024.

⁴Statutes of the Fondo BCA, Article VI dated November 20, 2024

⁵BCA Fund Operational Manual, August 2025





2.3 Eligible entities

- Entities that meet the eligibility criteria set out in the Grant Award Procedures Manual may access BCA Fund grants. The entities are initially “applicants” and become “Executors” upon signature of a grant agreement.



Public sector entities:

- The agencies and entities of the Executive Branch.
- The entities that comprise the autonomous decentralized regime.
- Agencies and entities established to provide public services or to carry out economic activities undertaken by the State.
- Legal entities established by regulatory act of the decentralized autonomous governments for the provision of public services.
- Universities, academic institutes, and research centers.

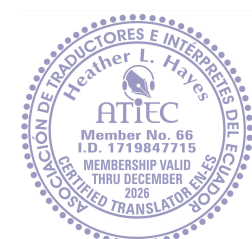
Private sector entities:

- Legally established civil society organization (CSO) in the country.
- For-profit legal entities.

22. Project proponents may apply to the calls for proposals issued by the BCA Fund, provided that they meet the established requirements and criteria, noting that their proposals must align with the objective of the BCA Fund, as set out in its Bylaws and policies.
23. The Board of Directors of the BCA Fund may establish specific restrictions on the participation of one or more of the entities described above in any call for proposals, in which case such restrictions will be detailed in the Terms of Reference for that call.
24. All eligible entities must comply with the environmental and social requirements set out in the BCA Fund ESMS as a condition for accessing and implementing the grants.

2.4 Modalities for the disbursement of funds and the project cycle of the BCA Fund

25. The ESMS is applied across the entire project cycle. Implementation of the ESMS begins during the concept note appraisal phase, continues throughout the detailed risk analysis, and is reflected in the development of project-specific environmental and social management plans (see Section 5 of the ESMS). No project may receive disbursements unless it has met the requirements established by the ESMS, including the required management instruments reviewed and validated by the BCA Fund technical team, in coordination with its environmental and social safeguards specialist. Compliance with these instruments will also be monitored throughout project implementation.
26. The life cycle of grants and projects under the BCA Fund is detailed in the Grant Award Procedures Manual. Financial resources for grants will be allocated between private-sector and public-sector proponents.
27. A grant is financial support provided by the BCA Fund, with the objective of funding projects that contribute to achieving the Fund's objectives, such as biodiversity conservation, environmental sustainability, community development, and conservation commitments. The BCA Fund establishes three grant categories, differentiated by the maximum funding amount and the duration of implementation:



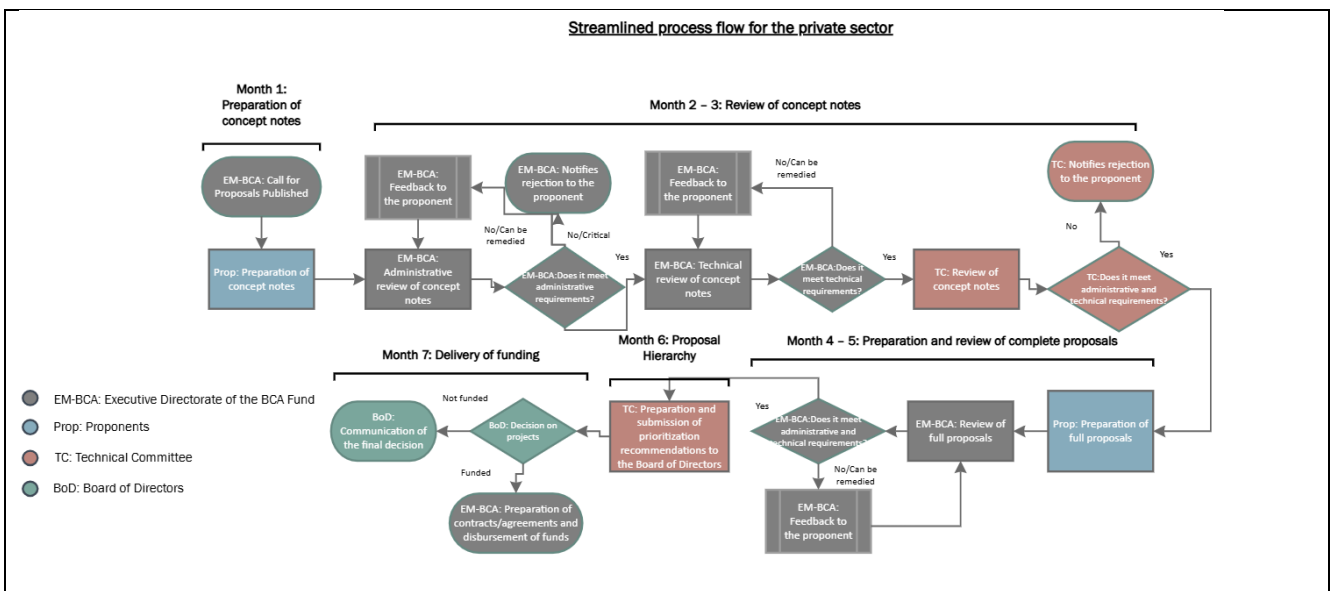
- Small grant (up to US\$100,000, up to 24 months)
- Mid-sized grant (from US\$ 100,001 to US\$ 500,000, up to 36 months)
- Large grant (more than US\$ 500,000, up to 48 months)

28. The BCA Fund has different grant award procedures for the private sector and the public sector. Regardless of the procedure, the ESMS requirements apply to all, with certain specific provisions for each that are described in section 5 of this ESMS.

2.4.1 BCA Fund procedure for awarding grants to the private sector

29. The BCA Fund will launch at least one annual call for proposals for grant funding from private sector entities.

Figure 2. BCA Fund Procedure for private sector grants



30. A full cycle of grants and projects for private sector organizations consists of the following main steps:

1. **Call for proposals.** The BCA Fund will issue at least one call for proposals each year for the submission of grant proposals by private sector proponents. The calls will set out the eligibility criteria, requirements, and instructions, and applicants will receive the relevant templates for submitting their applications.
2. **Proponents prepare concept notes and proposals.** All proposals, regardless of grant size, must, as an initial step, submit a concept note (CN) that complies with the established format and procedures. The Executive Management of the BCA Fund will review the initial CNs to determine their basic eligibility, and an initial preselection will be conducted. Preselected applicants will be requested to prepare and submit full proposals (relevant guidelines and templates will be provided).
3. **Evaluation and selection.** Once complete proposals are received, the BCA Fund conducts a multi-stage evaluation process, which typically includes a review of the proposal by the Executive



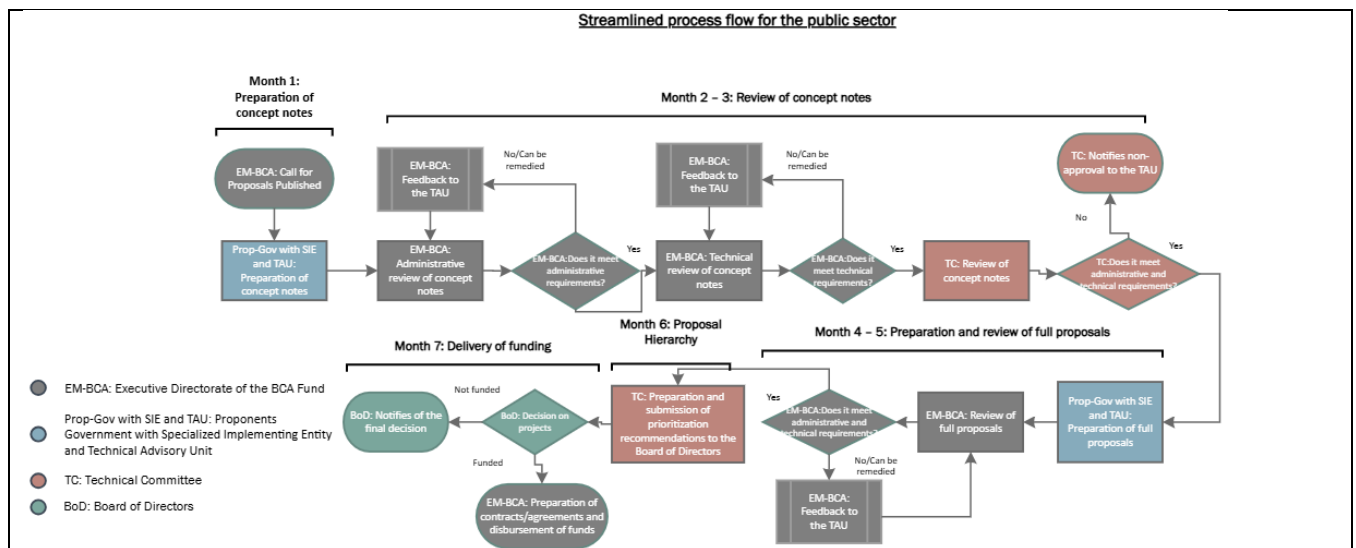
Management team, a Technical Committee review and prioritization, and final validation by the Board of Directors.

4. **Signing of the grant agreement.** Following the final decision of the Board of Directors, the outcome is formally communicated to all applicants. Selected applicants may be required to undergo a due diligence process before signing the grant agreement.
5. **Implementation and monitoring.** The BCA Fund actively oversees project implementation, providing technical and financial oversight. Executors must submit technical and financial reports, as well as a final project report. Periodic evaluations are conducted to measure project performance against the established objectives.
6. **Closure.** The BCA Fund carries out a project closure procedure, which may include a project evaluation, including an impact evaluation.

2.4.2 BCA Fund procedure for the award of grants to the public sector

31. The BCA Fund will carry out two (2) calls for proposals per year for the award of grants,

Figure 3. BCA Fund procedure for public sector grants



32. The complete grant and project cycle for the public sector is similar to the procedure for the private sector, with two additional specificities:

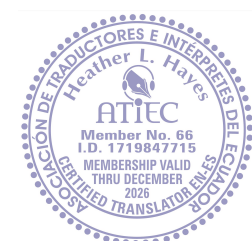
- A **Public Sector Technical Advisory Unit (TAU)** that provides guidance on implementation, monitoring, and coordination of actions for the BCA Fund by public sector proponents.
- Proposals must be submitted jointly with a private sector entity acting as **Specialized Executor (SEE⁶)**, which will sign the grant agreement with the BCA Fund and will be responsible for the implementation, oversight and monitoring of the project, as well as for procuring the goods and services required for its implementation.

⁶These may include non-governmental organizations, environmental funds, implementing agencies, or any other legal entity.



33. The full cycle of grants and projects consists of the following steps:

1. **Call for proposals.** The BCA Fund will issue at least two calls for proposals each year for public sector entities to submit grant proposals. The calls will provide eligibility criteria, requirements, and instructions, and applicants will receive the relevant templates to submit their applications.
2. **The SEEs prepare concept notes and proposals.** As an initial step, all proposals must be accompanied by a concept note that complies with the established format and procedure. The TAU will compile the concept notes, conduct an initial screening, and support the finalization and submission to the BCA Fund. The Executive Management of the BCA Fund will review the initial concept notes to determine eligibility and carry out an initial preselection. Preselected applicants will be asked to prepare and submit full proposals (relevant guidelines and templates will be provided). The TAU will support the SEEs in preparing the full proposal.
3. **Evaluation and selection.** Once complete proposals are received, the BCA Fund, with the support of the TAU, carries out a multi-stage evaluation process, which usually consists of a proposal review by the Executive Management team, a review/prioritization by the Technical Committee, and a final validation by the Board of Directors.
4. **Signature of the grant agreement.** Following the final decision of the Board of Directors, the outcome is formally communicated to all applicants. Selected applicants may be required to undergo a due diligence process before signing the grant agreement.
5. **Implementation and monitoring.** The BCA Fund, with support from the TAU, oversees project implementation, providing technical and financial oversight. Executors must submit technical and financial reports, as well as a final project report. Periodic evaluations are conducted to measure project performance against the established objectives.
6. **Closure.** The BCA Fund carries out a project closure procedure, which may include an evaluation of the project, including an impact evaluation.



3. Environmental and Social Policy Framework of the BCA Fund

3.1 Environmental and Social Policy Statement

34. The environmental and social policy of the BCA Fund consists of a set of principles and a commitment to apply procedures designed to ensure that projects financed by the BCA Fund deliver significant benefits for the environment and communities. This policy underscores the BCA Fund's commitment to support the conservation, protection, and management of biodiversity, as well as related sustainable development in the Biocorredor Amazónico, which includes its protected areas and other in situ conservation mechanisms, for the benefit of the Ecuadorian Amazon population.
35. As a financing entity, the BCA Fund integrates environmental and social considerations into all its operations, ensuring that resources contribute to sustainable development while minimizing potential adverse impacts during project implementation.
36. The BCA Fund will apply a precautionary approach to the conservation, management, and sustainable use of resources (natural and otherwise) through activities that avoid adverse impacts on protected areas, fragile ecosystems, biodiversity, and key ecosystem services; minimize waste and pollution; incorporate safeguard measures; and, where possible, enhance the habitats and biodiversity they protect. Activities to be financed by the BCA Fund that must be implemented in legally protected areas or internationally recognized areas, as defined in IFC Performance Standard 6 (PS6), including areas that qualify as Critical Habitat, must comply with and be consistent with the management instruments specific to such areas.
37. The BCA Fund requires proponents and Executors to ensure full respect for human rights in all their activities, with particular attention to protecting the rights of groups in situations of social, economic, environmental, and cultural vulnerability. To this end, Executors must mainstream human rights and social inclusion considerations into the design, implementation, and monitoring of funded activities, ensuring that they are accessible, relevant, and culturally appropriate.
38. The BCA Fund is committed to upholding the principles of transparency, accountability, and comprehensive stakeholder engagement, including informed consultation and participation and Facilitated Consultation with Consent Agreement,⁷ where applicable, ensuring that projects do not reinforce existing inequalities, but instead contribute to reducing the marginalization of vulnerable or disadvantaged groups.
39. The BCA Fund is sensitive and respectful of local policies and norms. This policy is inclusive of all persons, regardless of age, sexual orientation, gender, disability, religion, ethnic self-identification, socioeconomic status, or geographic area.
40. The BCA Fund will work with its proponents and Executors to ensure that efforts to mainstream gender equality are relevant, deliver long-term sustainability, and generate transformative impact by promoting participatory and inclusive decision-making processes and fostering women's leadership and empowerment.

⁷See section 3.2.3 and annex 5 of the SGAS for details on the Facilitated Consultation with a Consent Agreement.



41. The BCA Fund promotes the prevention of any human rights violations and harm to nature that may arise from funded activities, including, inter alia, involuntary resettlement, physical or economic displacement, and violations associated with non-compliance with the applicable legal framework. Within this framework, the Fund requires Executors to ensure that their interventions contribute to improving the living conditions of communities associated with the intervention areas or, at a minimum, ensure that funded activities do not undermine human well-being, environmental quality, biodiversity, or ecosystem integrity.
42. The BCA Fund requires its Executors to apply, in accordance with national regulations, the principles of fair treatment, non-discrimination, and equal opportunity for employees and contractors in carrying out their activities; to provide a safe and healthy working environment for all employees; and to ensure the health and safety of all stakeholders that may be affected by the funded management activities. A Labor Management System (LMS) is in place to address grievances from workers, contractors, and subcontractors, that is, all persons hired to carry out project activities, whether full time, part time, temporary, or occasional
43. The BCA Fund is committed to conducting all commercial transactions with honesty, integrity, fairness, due diligence, and respect, and requires its Executors and subcontractors to do the same.
44. The BCA Fund has established a Grievance Redress Mechanism (MARR; see section 8 of the ESMS) as part of its commitment to fostering strong relationships with external stakeholders and effectively managing the impacts of its financing activities on communities that may be affected.
45. Executors of the BCA Fund must adhere to this environmental and social policy statement of the BCA Fund and to the applicable environmental and social standards defined below. This environmental and social policy will be implemented through the Environmental and Social Management System (ESMS) of the BCA Fund and the project-specific management measures/plans prepared for each project, ensuring alignment with BCA Fund requirements, applicable national laws, and international agreements.

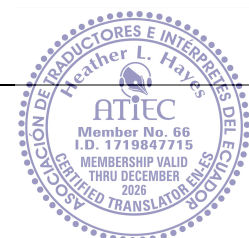
3.2 Applicable social and environmental standards

3.2.1 Applicable environmental and social standards

46. The environmental and social standards applicable to the BCA Fund are the International Finance Corporation's (IFC) Performance Standards.

Table 1. IFC Performance Standards

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| <ul style="list-style-type: none"> • Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts • Performance Standard 2: Labor and Working Conditions • Performance Standard 3: Resource Efficiency and Pollution Prevention • Performance Standard 4: Community Health, Safety, and Security • Performance Standard 5: Land Acquisition and Involuntary Resettlement • Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources • Performance Standard 7: Indigenous Peoples • Performance Standard 8: Cultural Heritage |
|---|



The IFC Performance Standards are also supplemented by a series of guidance notes to support the interpretation and application of these standards.⁸ In addition to the IFC Performance Standards, the BCA Fund ESMS also aims to align with:

- Environmental and Social Policies and Procedures of the Development Finance Corporation (DFC), 2024.
- Policy and Guidelines on the Safeguards of the Global Environment Facility (GEF), 2019.
- Environmental and Social Policy of the Green Climate Fund (GCF), 2021.
- Environmental and Social Policy Framework of the Inter-American Development Bank, 2020.
- TNC Integrated Performance Standards Policies and Procedures for GCF-funded projects, 2023.
- Other related policies and guidance include:
 - The Nature Conservancy (TNC) Voice, Choice and Action (VCA) Framework (principles and guidelines for community-led conservation)
 - TNC Human Rights Guide for Working with Indigenous Peoples and Local Communities
 - TNC Guide for Integrating Gender in Conservation, 2020.
 - Mechanisms for remedying TNC grievances.

47. Therefore, the BCA Fund ESMS follows the same structure as the IFC Performance Standards described in table 1. Furthermore, due to differences in the scope of activities typically financed by the IFC and those of the BCA Fund,⁹ there are some differences in the BCA Fund ESMS:

- Specific tools have been developed for the BCA Fund¹⁰ that reflect the structure of the IFC Performance Standards to provide practical guidance and emphasize procedural and substantive issues that are more specific to the BCA Fund’s activity sector (conservation), social commitments, and the context of Ecuador (i.e., stakeholder engagement, grievance management, gender, etc.), and are designed to address the commitments and requirements of the applicable standards in a practical manner.
- Due to differences in activities, risk tolerance, and financing exclusions, the scope of IFC Performance Standard 5 (Land Acquisition and Involuntary Resettlement) has been modified in the BCA Fund’s tools and guidance to better reflect the activities financed by the BCA Fund and the applicable risks.
- While IFC’s Performance Standards are designed to be applied worldwide, the BCA Fund’s ESMS is designed for Ecuador and therefore includes tailored guidance on how to address IFC Performance Standard 7 on “Indigenous Peoples,” based on the country’s national context. Section 3.2.3 of the ESMS includes Ecuador-specific guidance on Indigenous peoples and nationalities to support the screening and mitigation of environmental and social risks and to avoid the need for grant Executors to conduct substantial research on the subject. Annex 4 of this ESMS includes the relevant legal framework, and Annex 5 addresses the Protocol for Facilitated Consultation with Consent Agreement.
- The IFC does not have a specific gender equality standard; however, its standards explicitly incorporate elements that recognize the importance of identifying differentiated impacts and assessing risks for men and women, as well as the importance of culturally appropriate

⁸IFC (2021) Guidance Note 1 Assessment and Management of Environmental and Social Risks and Impacts. <https://www.ifc.org/content/dam/ifc/doc/2010/2012-ifc-performance-standards-guidance-note-en.pdf>

⁹While the IFC Performance Standards were designed and are applied to a range of primarily commercial activities financed by the IFC, including infrastructure development, large-scale agriculture, etc., the BCA Fund ESMS applies to activities in the conservation sector.

¹⁰Environmental and Social Assessment Tool and ESAP; see section 4 and the ESMS Excel tools.



and gender-sensitive consultations, and of ensuring that grievance mechanisms are accessible and responsive to women’s needs, among other elements. The IDB includes a performance standard on gender equality (Standard 9), and TNC has guidelines and notes on integrating a gender perspective, considering it essential to achieving sustainable and effective environmental outcomes. It also considers that this is not only a human rights issue, but an imperative for the success of projects financed by the BCA Fund.

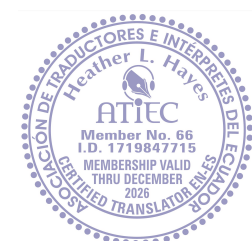
48. As will be explained in more detail in section 5 (environmental and social management procedure), the BCA Fund ESMS has three main tools to ensure the identification, prevention, and mitigation of environmental and social risks associated with activities financed by the BCA Fund. These are:

- **Checklist of activities excluded from the BCA Fund (ESMS tool 1).** This list describes the activities that the BCA Fund will not finance; inclusion of any of these activities in a concept note or proposal will trigger an automatic request to revise the submission to remove the excluded activities.
- **Environmental and Social Assessment Questionnaire (ESMS tool 2).** This tool follows the structure of the IFC standards (subject to the BCA Fund ESMS adaptations mentioned above) and includes detailed guiding questions applicable to the context of the BCA Fund’s financing priorities, designed to help proponents identify and articulate clear, project-specific environmental and social risks related to each applicable standard. The tool also provides guidance on how to categorize these risks during the mitigation design phase, based on the perceived likelihood of occurrence and the severity of their impacts, should they occur. See section 5 of the ESMS for an explanation of risk categorization and annex 3.
- **Environmental and Social Action Plan (ESAP) (ESMS tool 3).** This tool continues the risk management process following the identification, formulation, and assessment of environmental and social risks. The ESAP provides a structure, guidance, and examples to support the formulation of appropriate environmental and social mitigation measures, including additional assessments when necessary. The tool addresses each **Performance Standard** and is intended to ensure that environmental and social mitigation measures are integrated and, to the extent possible, budgeted for during the project design phase. The ESAP is designed to guide potential Executors in formulating clear and practical mitigation measures in a direct manner, rather than automatically requiring the preparation of specific “plans” (for example, an access restrictions mitigation plan, an Indigenous Peoples plan, etc.).

49. While not all projects or activities funded by the BCA Fund may have a significant social or environmental impact, the requirements and guidelines on stakeholder engagement apply to all types of activities funded by the BCA Fund, regardless of the grant category. Therefore, the environmental and social assessment tool must be completed for all funded activities, in accordance with the procedure described in section 5 below.

50. To support implementation, the ESMS also provides in annexes 10 and 11 templates for various types of plans that may be required as environmental and social risk management measures. The need for these plans will be determined by the proponent and the BCA Fund Executive Management in the Environmental and Social Action Plan (ESAP). The proposed templates include:

- Gender Action Plan (GAP)
- Stakeholder Engagement Plan (SEP)
- Biodiversity Action Plan (BAP)
- Alternative Livelihoods Action Plan (ALAP)
- Environmental and Social Code of Practice (ESCOP)



3.2.2 Participation requirements for stakeholders and mechanism for receiving and responding to complaints

51. Stakeholder participation is a generic term that encompasses a range of activities and interactions throughout the life cycle of a project. These can be organized into the following general categories:

- Stakeholder identification and analysis
- Information sharing
- Consultation with stakeholders
- Negotiation and agreement on appropriate mitigation measures with the people affected by the project (as appropriate)
- Grievance management
- Stakeholder engagement in project monitoring

52. While the BCA Fund's ESMS seeks to avoid an overly prescriptive approach, stakeholder engagement for each proponent/Executor must be based on stakeholder identification and analysis and on the development of a Stakeholder Engagement Plan (SEP). These will vary in complexity and scale depending on the size of the grant, the proponent's/Executor's capacity, and the level of risk, and will be determined during proposal preparation. However, to ensure consistency, the following general guidance is provided.

53. A stakeholder analysis should:

- Identify all stakeholders who may be affected by the project and its activities.
- Assess their interest in the project.
- Assess how project activities could affect them (positively and/or negatively).
- Assess the ways in which they may affect project implementation and results.
- Special efforts must be made to ensure that stakeholder analysis goes beyond identifying "local communities" as a homogeneous stakeholder group. Stakeholders (including local communities) must be differentiated by gender and other key dimensions of socioeconomic differentiation (for example, income level, security of land tenure, ethnic self-identification, especially where Indigenous Peoples are present).

54. The Stakeholder Engagement Plan (SEP) must focus on the site or community level and describe:

- What type of information will be shared during the consultations (project activities, potential benefits, potential adverse impacts, beneficiary selection criteria, timelines, roles and responsibilities, etc.).
- What support materials or communication formats will be developed to ensure the cultural appropriateness of the consultation (delivery in local languages, non-technical information materials, etc.) using inclusive language. The format of the consultation (consultation mechanism, schedule, location, frequency, etc.).
- The specific measures that will be implemented to engage vulnerable groups or individuals, or those experiencing inequality, and to ensure that no undue influence is exerted (separate focus groups from the main meetings, women's/men's groups, anonymous voting, etc.).
- How decisions will be made to ensure broad community agreement (consensus voting, etc.).



This is also detailed in the ESMS tools and in Annex 10.

55. As mentioned previously, the proponents/implementing entities are responsible for implementing this ESMS and ensuring compliance with the requirements of the BCA Fund, which may include a grievance redress procedure or mechanism. The BCA Fund ESMS requires implementing entities to establish grievance redress mechanisms or procedures (MARR) for projects with medium or large grants and classified as “substantial risk (B+)” (according to the classification procedure explained in section 5 on classification criteria).
56. B+ project Executors (with large or medium grants) that have an existing grievance redress procedure or mechanism must inform the Executive Management of the BCA Fund and share, in writing, the relevant information on its structure and operation. The Executive Management will review it, and the relevant measures will be agreed to link it to the BCA Fund MARR. B+ project Executors (with medium or large grants) that do not have an existing MARR procedure or mechanism must design their own, using the provisions set out in section 8 as a reference.
57. At the Executor level, the MARR must consist of the following key elements:
- Dedicated person(s) or focal points responsible for informing stakeholders how to access the MARR, receiving claims and ensuring proper documentation and secure storage of claims-related information, referring to the BCA Fund claims that cannot be addressed, and providing information to complainants. Focal points may be designated from among staff directly involved in the project who interact directly with stakeholders and communities potentially affected by the project.
 - The communication or outreach plan for the MARR should reach the different types of stakeholders in the project area through various communication channels and, when necessary, in native languages. Executors must choose methods that are appropriate to their context. When applicable, the mechanism should be culturally adapted and facilitated in the native languages of Indigenous Peoples and nationalities, respecting traditional conflict resolution systems.
 - Implementing entities must identify and establish adequate and convenient channels for receiving grievances that are appropriate to the context and local culture, sensitive to age and gender, and easily understood. There is no limit on the number of grievance intake channels that a MARR must have; however, at least one physical (non-electronic) channel must be available. Measures must be in place to prevent reprisals and retaliatory actions. As the project progresses, the need for additional channels for submitting grievances may arise, and appropriate methods may be adopted.
58. The processing of personal data must comply with current national legislation on the protection of personal data.

3.2.3 Indigenous Peoples, Communities and Nationalities

59. The BCA Fund recognizes the existence of the collective rights of indigenous peoples, communities, and nationalities in the Ecuadorian Amazon. Therefore, and in accordance with national public policies and the current regulatory framework (see annex 4), the ESMS is structured to support and ensure the effective exercise and realization of these rights.



60. In accordance with IFC Performance Standard 7 (PS7), and in order to effectively ensure the collective rights of Indigenous Peoples and Nationalities (IPN), the BCA Fund will implement specific CPLI procedures or will require the submission of documentation demonstrating that CPLI was obtained through mechanisms or procedures agreed upon by the Indigenous Peoples themselves and duly recognized by the collective, when the projects to be implemented involve IPN as proponents, partners, beneficiaries, or potentially affected parties. Therefore, the ESMS does not require the preparation of standalone Indigenous Peoples plans, since the procedures and requirements are included directly in the ESMS.
61. Given its nature, activities to be financed by the BCA Fund must take into consideration specific guidelines that are consistent with national and international regulatory frameworks, the BCA Fund's raison d'être and programmatic documents, its ESMS, and the specific characteristics of the Biocorredor Amazónico and its inhabitants. The ESMS includes a Protocol for Facilitated Consultation with Consent Agreement (see Annex 5), which contains a model consent form. The Protocol includes a step-by-step procedure applicable to all cases in which Indigenous Peoples and Nationalities (IPN) do not have their own CPLI procedures. The ESMS also includes a checklist for implementation of the Protocol (Annex 6), which details the circumstances under which CPLI is required, as established in IFC Performance Standard 7 (PS7), to guide project proponents/Executors and the BCA Fund Safeguards Specialist. Annex 4 of this ESMS includes a comparative analysis showing how the ESMS complies with the requirements of IFC PS7.
62. Specific criteria. Specific criteria are set out below in relation to the main collective rights to which project proposals to be financed by the BCA Fund may be linked, as applicable:
- a) Priority will be given to actions directly related to implementing the communities', peoples', and indigenous nationalities' current life plans, respecting their rights to free self-determination, participation, and consultation, including their free, prior, and informed consent, as applicable.
 - b) When a project is to be implemented in an area considered to be the ancestral property, title, or possession of an indigenous people, community, or nationality, the proponent or Executor shall obtain the free, prior, and informed consent of the community, people, or nationality in whose territory the project will be implemented. The process for obtaining this consent shall comply with the provisions of the Protocol for Facilitated Consultation with Consent Agreement (available in annex 5).
 - c) The actions to be financed shall at all times respect the indigenous peoples', communities', and nationalities' own models of social organization and governance, taking into account that such models constitute part of the exercise of their right to self-determination.
 - d) National legislation provides a specific regulatory framework for the regularization, legalization, and titling of rural lands and the ancestral territories of Indigenous peoples and nationalities. In this regard, proponents and implementing entities must consider that procedures for Indigenous territories are subject to the constitutional guarantee of free-of-charge titling, in recognition of their collective right to self-determination. Therefore, communities, peoples, or nationalities shall not be required to undertake activities that entail costs or expenses for those communities, or that are not duly covered either by project resources or by their own resources or resources allocated by third parties, at the discretion of the proponent or Executor.
 - e) The actions to be financed must ensure full respect for indigenous territories and rural lands that have regularized possession or ownership status under a collective or individual title, depending on the project's intervention area.
 - f) At all times, it shall be assessed whether the specific regulations to facilitate land titling for Indigenous communities in protected areas have been issued and are in force at the time the actions are implemented. If such regulations have not been formally issued, the relevant



consultations shall be conducted with the National Environmental Authority in order to proceed in accordance with the legislation in force and applicable at the time the respective actions are implemented.

- g) Any displacement or physical resettlement action is not applicable in the territories of indigenous peoples, as it constitutes a direct violation of their collective constitutional rights. Therefore, actions involving displacement or physical resettlement will not be financed by the BCA Fund, even if they include damages or compensation for voluntary resettlement to indigenous peoples, communities, or nationalities.
- h) All actions to be financed must respect and guarantee both the right to collective property and the social, economic, and environmental functions of land.
- i) When, due to the nature of the proposed actions, there may be a risk of economic displacement affecting indigenous communities, peoples, or nationalities, this risk must be identified, assessed, and managed through a specific plan in which, in agreement with the members of the indigenous peoples, communities, or nationalities, mechanisms are established to avoid such activities, replace them with equivalent alternatives, effectively mitigate potential impacts, and ensure that the intervention generating the risk is limited to a short, specific, and reversible period.
- j) Project proponents and Executors shall periodically update their knowledge of the laws and regulations issued by the competent national authorities that may be related to the exercise of the collective rights of indigenous communities, peoples, and nationalities. In particular, they shall monitor the implementation of new requirements during project implementation, and lack of awareness of such requirements shall not constitute a justification for non-compliance or non-application.
- k) In particular, in implementing project actions, consideration shall be given to those regulations related to participatory governance arrangements, access to genetic resources, bio-enterprises, benefit-sharing, land tenure regularization, sustainable biodiversity management, biotrade, territorial planning, natural and cultural heritage, ecological connectivity, and planning.
- l) Any activity to be implemented that relates to the cultural heritage of indigenous communities, peoples, and nationalities shall respect their collective rights. Respect for collective decision-making processes and the free, prior, and informed consent are indispensable requirements to adequately guarantee their rights. If any specific matter related to cultural heritage is not recognized or regulated in national legislation, the international standards providing the highest level of protection or safeguards shall be applied during project implementation.
- m) Project Executors shall ensure that information on voluntary deposit mechanisms for ancestral practices, knowledge, or wisdom is provided to the communities, peoples, and nationalities with which the project is implemented, in the event that such ancestral practices, knowledge, or wisdom that may be subject to voluntary registration are identified during implementation.
- n) Planned project activities shall include mechanisms to ensure equitable access to natural resources by communities, as well as equitable access to genetic resources and the fair and equitable sharing of associated benefits, should these arise during project implementation.
- o) Project Executors shall provide clear, culturally appropriate, and duly validated information on their grievance redress mechanisms to the indigenous communities, peoples, and nationalities with whom they work in implementing their projects. This is to ensure the existence and functionality of transparency and reporting mechanisms that enable effective participation and governance over project resources, project activities, and project implementation mechanisms.
- p) Project Executors financed by the BCA Fund who carry out activities linked to the territories of Indigenous communities, peoples, and nationalities, or to persons belonging to these



groups, must formally declare that they are aware of and understand the scope of collective rights, as established in Article 57 of the Constitution of Ecuador.

- q) Once the Executors have obtained the consent of the IPNs (in accordance with the provisions of the Facilitated Consultation Protocol with a Consent Agreement available in Annex 5), they will periodically seek feedback and concerns from the relevant IPNs and keep the BCA Fund informed.

4. Exclusion list or activities not eligible for financing through the BCA Fund

63. The BCA Fund exclusion list (annex 2) is based on the organization’s mission, strategic objectives, donor requirements, and international and national best practices, and provides a description of the activities considered ineligible for financing from the BCA Fund.¹¹

64. The BCA Fund does not provide funding for projects that:

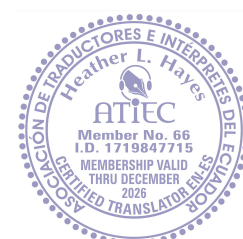
- Intentionally entail significant environmental or social risks that are difficult to mitigate,
- Adversely affect vulnerable groups,
- Entail or result in forced eviction or involuntary resettlement,
- Result in the loss of livelihoods or cultural or environmental degradation without adequate compensation, or that do not involve stakeholders in decision-making processes.
- Cause damage to important archaeological, cultural, spiritual, or religious sites, or are primarily aimed at generating profits without reinvesting in conservation efforts.
- Do not involve stakeholders in decision-making or lack effective mechanisms for participation and transparency.
- Go against national law, international agreements ratified by Ecuador, or the standards of the BCA Fund donors.
- Are designed primarily to generate private benefits without clear mechanisms to reinvest in conservation actions or in social and environmental sustainability.

65. Therefore, the BCA Fund will not support any sector or project activity that may contravene donor organizations’ requirements or that is considered illegal under national laws and regulations, international conventions and agreements, or that is subject to international prohibitions.

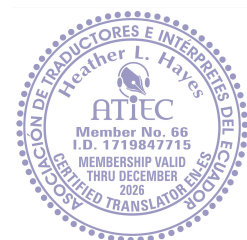
66. This exclusion list will serve as a preliminary screening tool for the concept note selection process and is formatted as a checklist for proponents to review and confirm their compliance with the criteria. The complete list is included in annex 2 of this ESMS and in tool 1 of the ESMS. This list may be reviewed and adapted in the future if new donors introduce additional requirements.

¹¹The main reference sources for the exclusion list are:

- The Nature Conservancy, 2025, Exclusion List.
- International Finance Corporation (IFC), 2007, Exclusion List.
- World Bank, 2025, Exclusion list.
- Inter-American Development Bank (IDB), 2020, Exclusion List



67. The BCA Fund may review and update this list when new sources of financing, additional donor requirements, or relevant regulatory adjustments are incorporated.



5. Environmental and Social Management Procedure

68. This section describes **how the environmental and social impacts and risks** of all activities financed by the BCA Fund are identified, assessed, and addressed. A key principle of the environmental and social management process is to integrate environmental and social concerns raised by stakeholders into project cycle management. Each stage of the project cycle offers opportunities to address environmental and social requirements in order to achieve good performance.
69. As described in section 2 of this ESMS, the BCA Fund has one procedure for awarding grants to the private sector and another for the public sector. Given that these procedures follow similar steps, this section addresses both procedures jointly.
70. This process adopts a risk-based approach, ensuring that the level of environmental and social due diligence is commensurate with the level of potential environmental and social risk associated with each financing modality and activity. The assessment and management of environmental and social risks and impacts of activities financed by the BCA Fund is a collaborative process carried out throughout the project cycle by the proponents/Executors (with TAU and SEE) and the Executive Management of the BCA Fund. **Proponents and Executors are responsible for screening, assessing, managing, and reporting on the environmental and social risks related to the proposed activities, while the BCA Fund is responsible for assessing, providing guidance on, and validating the screening and environmental and social risk management measures, as well as overseeing their implementation.**
71. The BCA Fund and the implementing entities must ensure adequate technical and management capacity to conduct environmental and social assessment and management. This includes the human resources, training, and budgets required for this purpose.
72. The following steps for environmental and social management and the tools to be used during the different phases of the BCA Fund project cycle are presented below. This includes the roles and responsibilities of the BCA Fund and of project proponents/implementing entities. **The ESMS was designed to be practical and to ensure that risk assessments and monitoring measures to manage these risks are as practical and efficient as possible.**
73. The ESMS defines 10 key steps for risk assessment and risk management, as well as 3 operational tools applied at different stages of the project cycle:
- **Tool 1:** Exclusion Checklist.
 - **Tool 2:** Environmental and Social Assessment Questionnaire.
 - **Tool 3:** Environmental and Social Action Plan.
74. The following diagram summarizes the environmental and social risk management process implemented by the BCA Fund for private- and public-sector grants.

Figure 4. Environmental and social risk management in the project cycle of the BCA Fund.



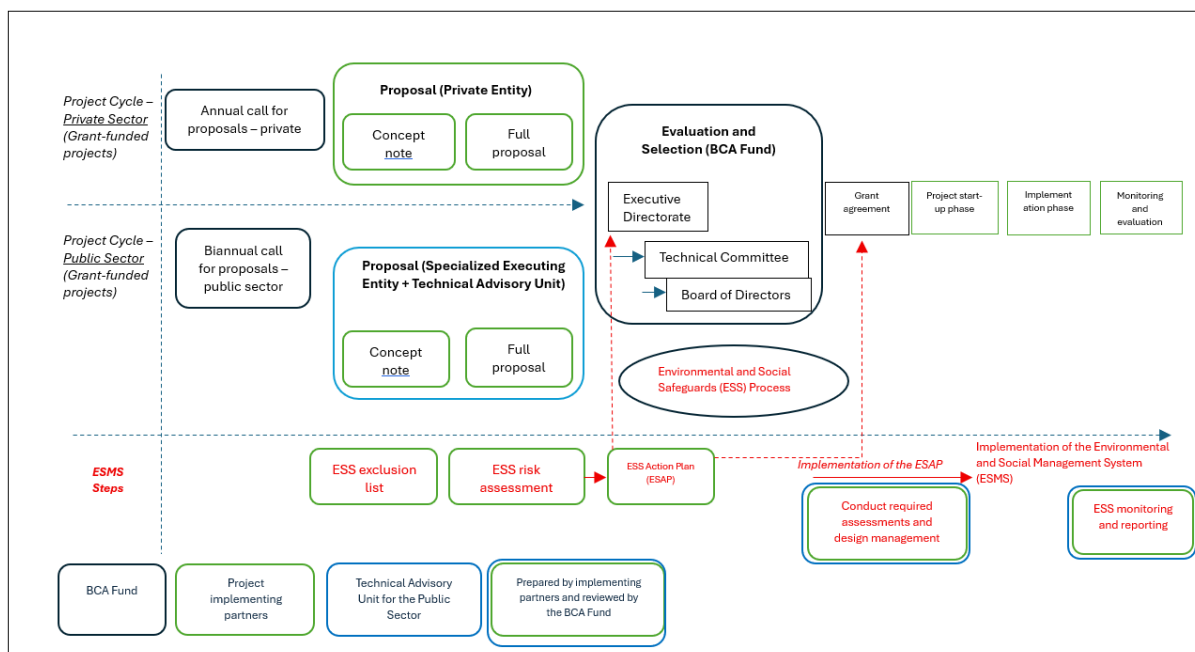
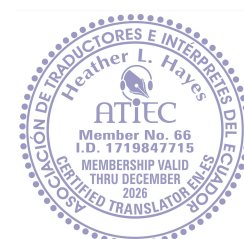


Table 2. Summary of steps for environmental and social management in the project cycle of the BCA Fund

Project cycle phase	Steps for environmental and social management
Call for proposals	<p>Step 1: Communicate environmental and social requirements in the call for proposals <u>Responsible:</u> Executive Management of the BCA Fund <u>Tool:</u> Templates for concept notes/proposals and the ESMS Excel tool (which contains the exclusion list, the environmental and social assessment questionnaire, and the environmental and social action plan), as well as the Consultation Protocol (annex 5) and the checklist (annex 6) <u>Timing:</u> Upon publication of the call for proposals</p>
	<p>Step 2: Assessment of activities using the exclusion list <u>Responsible party:</u> Proponent <u>Tool:</u> ESMS Excel Tool 1 (exclusion list) <u>Timing:</u> Concept note phase.</p>
	<p>Step 3: Assessment of the proposed activities using the environmental and social assessment questionnaire <u>Responsible:</u> Proponent (and Public Sector Technical Advisory Unit) <u>Tool:</u> ESMS Tool 2 Excel (environmental and social assessment and categorization) <u>Timing:</u> During the full proposal phase</p>
	<p>Step 4: Preparation of an Environmental and Social Action Plan (ESAP) <u>Responsible party:</u> Proponent (and Public Sector Technical Advisory Unit) <u>Tool:</u> ESMS Excel Tool 3 (ESAP) <u>Timing:</u> During the full proposal phase</p>



Project cycle phase	Steps for environmental and social management
Review of proposals	<p>Step 5: Review and evaluation of the environmental and social assessment and ESAP <u>Responsible party:</u> Executive Management of the BCA Fund <u>Tool:</u> Reviewer columns in the ESMS Excel tool + Environmental and Social Review Note and consultation protocol implementation checklist (annex 6) <u>Timing:</u> During the evaluation of proposals</p>
Approval and agreement	<p>Step 6: Review and approval by the Technical Committee and the Board of Directors <u>Responsible party:</u> Committee and Board <u>Tool:</u> Review Note with recommendations to the Technical Committee and the Board <u>Timing:</u> Review and approval by the Board</p> <p>Step 7: Inclusion of environmental and social clauses and ESAP mitigation measures in grant agreements <u>Responsible party:</u> Executive Management of the BCA Fund <u>Tool:</u> Grant Agreement and ESAP <u>Timing:</u> Signing of the contract/agreement</p>
Implementation and monitoring	<p>Step 8: Implementation of ESAP requirements <u>Responsible party:</u> Executor (and Public Sector Technical Advisory Unit) <u>Tool:</u> ESAP and required management assessments and measures + Consultation protocol and checklist <u>Timing:</u> Initial implementation phase</p> <p>Step 9: Implementation and supervision of environmental and social management measures/plans <u>Responsible party:</u> Executor <u>Tool:</u> ESAP and specific risk management plans (as applicable) <u>Timing:</u> Implementation phase, annually</p> <p>Step 10: BCA Fund Annual Report on Environmental and Social Management <u>Responsible party:</u> Executive Management of the BCA Fund <u>Tool:</u> Annual report (section on ESMS) <u>Timing:</u> Annually</p>

75. Phase 1: Calls for proposals

According to the Grant Award Procedure Manual, the BCA Fund selects the projects it will finance through a grant-making modality following a call for proposals. The call for proposals phase can be divided into three stages: (1) publication of the call by the BCA Fund, (2) preparation of concept notes/full proposals by applicant entities, and (3) evaluation/selection by the BCA Fund. Each phase includes key steps for environmental and social management.

Step 1: The BCA Fund call for proposals will include clear information on the BCA Fund Environmental and Social Policy Framework (section 3 of the ESMS), the exclusion list, and the ESMS procedure (steps described in this section). Likewise, at this stage, proponents will be informed about the Protocol for Facilitated Consultation with a Consent Agreement (annex 5).

Step 2: Once the activities have been defined in the concept notes, proponents must ensure that none of the activities submitted for funding appears on the BCA Fund exclusion list. To do so, they must complete the exclusion list (ESMS tool 1), which will be submitted together with the concept note/proposal.



Step 3: In the full proposal phase, the proponent will also complete the environmental and social assessment questionnaire (ESMS tool 2) to identify potential environmental and social risks associated with the proposed activities. One of the outputs of the environmental and social assessment is the project risk categorization. Each activity has its own unique characteristics, which depend on the local context, applicable legislation, and project activities. The risk categories linked to the activities are intended to provide guidance for determining appropriate environmental and social assessment and management measures that are proportionate to the activity's level of risk.

The risk level of an activity is defined based on a combined assessment of the severity of the potential impact and the likelihood of its occurrence. While the IFC Performance Standards include only three risk categories (A, B, and C),¹² many other environmental and social management systems (ESMS) used by multilateral development institutions now apply four.¹³ Financial institutions in the conservation sector, which support different types of activities and face different environmental and social risks and impacts compared with most projects financed by multilateral development institutions such as the IFC, also apply four categories.¹⁴ The BCA Fund ESMS uses the following four risk categories:

- "A" (high risk): a proposed project is classified as high risk if it is likely to entail significant adverse risks and impacts on human populations or the environment. This could be due to the complex nature or scale of the project, and/or the sensitivity of the project location(s). Consideration would be given to whether the potential environmental and social risks and impacts associated with the project exhibit most or all of the following characteristics:
 - long-term, permanent, and/or irreversible impacts that cannot be fully avoided due to the nature of the project
 - large-scale and/or with extensive geographic coverage
 - significant adverse cumulative impacts
 - significant adverse transboundary impacts
 - Other important factors include:
 - High probability of significant adverse impacts on human health and/or the environment.
 - The area likely to be affected is of high value and sensitivity and includes Indigenous Peoples' lands or rights and those of other vulnerable minorities; intensive or complex land acquisition and restrictions on land use; impacts on cultural heritage; or densely populated urban areas.
 - Some of the project's significant adverse environmental and social risks and impacts cannot be mitigated or require complex and/or unproven, specific mitigation measures, compensatory measures or technology, or sophisticated social analysis and its implementation.
 - **The BCA Fund will not finance Category A (high-risk) projects.**

- "B+" (substantial risk): a proposed project is classified as substantial risk on the basis of the following factors:
 - The project may not be as complex as a high-risk project.
 - The nature and magnitude of its environmental and social risks and impacts may be lower, and the location may not be in such a sensitive area; however, some adverse

¹²<https://www.ifc.org/content/dam/ifc/doc/mgrt-pub/ifc-exclusion-list.pdf>

¹³See, for example, the World Bank Environmental and Social Framework (ESF) <https://thedocs.worldbank.org/en/doc/837721522762050108-0290022018/original/ESFFramework.pdf> page 6: "environmental and social risk classification"; the Asian Development Bank Environmental and Social Framework (ESF) <https://www.adb.org/sites/default/files/institutional-document/1033311/environmental-social-framework.pdf> pages 8-9

¹⁴This includes the Legacy Landscapes Fund <https://legacylandscapes.org/wp-content/uploads/2023/02/LLF-SGAS-ESF-2023-02-15.pdf>; the Blue Action Fund https://www.blueactionfund.org/wp-content/uploads/2019/05/01_SGAS_BlueAction.pdf page 18 and the MAR Fund <https://marfund.org/en/wp-content/uploads/2022/07/MAR-Fund-SGAS-2022-06-14-vf.pdf> pages 1-9



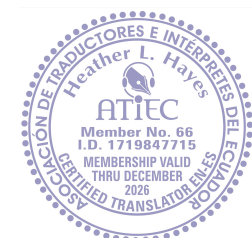
risks and impacts may be significant. For this purpose, consideration would be given to whether the potential environmental and social risks and impacts display most or all of the following characteristics:

- are mostly temporary, predictable, and/or reversible, and the nature of the project does not preclude the possibility of avoiding or reversing them;
 - There is concern that the project’s unmitigated adverse social impacts and the associated mitigation measures may result in a limited degree of social conflict, harm, or risks to human security;
 - are of moderate magnitude and/or moderate spatial extent;
 - There may be cumulative and/or transboundary impacts, but they are less severe and eaSEEr to avoid or mitigate than in high-risk projects; and
 - There is a medium-to-low probability that significant adverse impacts to human health and/or the environment will occur, and known and reliable mechanisms are available to prevent or minimize such incidents.
 - The expected effects of the project in areas of high value or sensitivity are expected to be lower than those of high-risk projects.
 - Mitigation and/or compensatory measures can be designed more easily and be more reliable than those for high-risk projects.
- “B” (moderate risk): a proposed project is classified as moderate risk based on the following factors:
 - It is unlikely that the potential adverse risks and impacts on human populations and/or the environment will be significant. This is because the project is not complex and/or large-scale, does not involve activities with a high potential to harm people or the environment, and is located far from environmentally or socially sensitive areas. Therefore, the potential risks and impacts on the environment and society are likely to have the following characteristics:
 - will be predictable and are expected to be temporary and/or reversible;
 - of low magnitude;
 - site-specific, with no likelihood of impacts beyond the project’s actual footprint; and
 - Low probability of significant adverse impacts on human health and/or the environment.
 - The environmental and social risks and impacts of the project can be mitigated easily and predictably.
 - "C" (low risk): a proposed project is classified as low risk if its potential adverse risks and impacts on human populations and/or the environment are likely to be minimal or insignificant.

Each activity must be classified during the selection phase. When making classification decisions, account is taken of the likelihood of a risk occurring and the severity of the impact, should it occur. The combination of these two factors determines the activity’s overall risk classification. Further guidance is provided directly in the environmental and social assessment questionnaire (ESMS tool 2) and in annex 3. The project will be assigned an overall risk classification based on the highest-risk activity within the project.

Step 4: At this stage, the project proponents will prepare the ESAP and submit it to the EM of the BCA Fund for review, discussion, and approval. The ESAP must describe:

- The mutually agreed list of applicable risks.
- The evaluations to be conducted.



- A description of the environmental and social management instruments/measures to be developed for each identified risk prior to the implementation of activities.
- A description of responsibilities, time frames, and budgets for implementing all actions included in the ESAP.
- Monitoring and reporting indicators.

76. **Phase 2: Application review**

Step 5: The environmental and social exclusion list, the environmental and social assessment, and the completed ESAP will be reviewed by the safeguards specialist of the Executive Management (EM) of the BCA Fund. The purpose of this step is to identify any potential environmental and social risk areas that may be unacceptable (for example, non-compliance with the exclusion list) for the BCA Fund or that may require additional assessments. This review is limited to a desktop review of the information received from the proponent organizations and their activities, discussions with them, and a review of documentation related to the proposal. A feedback and discussion phase will take place between the EM of the BCA Fund and the proponent to make corrections. Once reviewed and validated by the EM, the results and recommendations are recorded for the Technical Committee in the form of an Environmental and Social Review Note (template in annex 9), which summarizes key information related to environmental and social risks (including the project’s overall risk categorization, applicable standards, key risks, and the measures set out in the Environmental and Social Action Plan).

The ESAP may be updated if conditions or risks change during implementation.

77. **Phase 3: Approval and agreement**

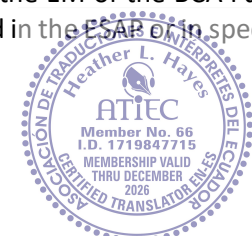
Step 6: The EM of the BCA Fund will submit the approved proposals and the ESAP (as an integral part of the project), together with the corresponding Environmental and Social Review Notes, to the Board for review and approval.

Step 7: Once approved, the EM of the BCA Fund will prepare the grant agreement, which will include the environmental and social requirements that the Executor must comply with during implementation, as described in the ESAP. The EM of the BCA Fund will be responsible for ensuring that these requirements are included in the grant agreement prior to its signature. Funding will be disbursed only if the Executor commits to implementing (and reporting on) the environmental and social measures described in the ESAP and the associated obligations set out in the agreement’s environmental and social clauses. Disbursements are conditional on environmental and social compliance.

78. **Phase 4: Implementation and monitoring**

Step 8: At the start of the project, the implementing entities shall conduct the assessments and finalize the design of the risk management measures described in the ESAP. These will be reviewed by the BCA Fund safeguards specialist and shall be approved by the EM of the BCA Fund prior to the implementation of project activities. The Fund may verify the assessments on site, if it deems it necessary.

Step 9: During the implementation of project activities, the implementing entities shall apply the approved risk management measures, as well as monitor and report to the EM of the BCA Fund. This shall be done annually and in accordance with the indicators included in the ESAP in specific management plans.



Step 10: The final step of the environmental and social management cycle is annual reporting at the BCA Fund level. To this end, an environmental and social management section will need to be included in the BCA Fund annual report.

6. Provisions for implementation of the ESMS

79. Responsibility for ensuring implementation of the ESMS is shared among the proponents/implementing entities, the Public Sector Technical Advisory Unit, the EM of the BCA Fund, and the Board of Directors. The role of each stakeholder is defined in this section. In summary:
- The proponents/Executors of the BCA Fund are primarily responsible for implementing the ESMS requirements, including conducting the initial environmental and social risk assessment, developing and implementing an ESAP, managing risks, engaging stakeholders, and monitoring and reporting.
 - The Executive Management of the BCA Fund, through the safeguards specialist, leads the BCA Fund's day-to-day oversight and compliance with the ESMS by reviewing and overseeing environmental and social risk assessments and the ESAP, and by overseeing compliance and reporting.
 - The Board of Directors provides strategic oversight and ensures that the ESMS aligns with the objectives of the BCA Fund and international best practices. It will be consulted on activities/projects with significant risks and any modifications to the ESMS. The Board will also act as an advisory body (from the perspective of the BCA Fund) on grievances under the institutional MARR of the BCA Fund.

80. Project Proponents/Executors

The proponents/Executors are responsible for applying the ESMS in their financed projects. Their responsibilities include:

- Carry out an environmental and social assessment using the ESMS tools of the BCA Fund.
- Develop and implement an Environmental and Social Action Plan (ESAP) describing potential impacts and risk mitigation measures.
- Comply with all contractual obligations related to the ESMS, including adherence to the exclusion list and the BCA Fund grievance mechanisms.
- Develop, facilitate, and implement a grievance procedure or mechanism at the project level (for category B+ projects with medium or large grants).
- Report on environmental and social performance using the BCA Fund monitoring framework.
- Engage with local stakeholders, including local communities, indigenous peoples and nationalities, and other affected populations, in a transparent and participatory manner.

81. Executive Management of the BCA Fund

The Executive Management is responsible for overseeing the implementation of the ESMS and ensuring that Executors comply with safeguard requirements. Its main responsibilities include:

- Oversee the ESMS and ensure compliance with it.
- Conduct environmental and social risk due diligence during the project selection process.
- Provide technical assistance to Executors in risk assessment and in the planning and implementation of mitigation measures.
- Design and deliver training on the ESMS for relevant stakeholders.



- Host and implement the grievance redress mechanism (MARR) of the BCA Fund.
- Monitor the implementation of environmental and social safeguards across all financed projects.
- Enforce compliance with ESMS requirements through contractual obligations in grant agreements.
- Report on the results of the implementation of the ESMS to the Board of Directors and relevant donors.

82. **Environmental and Social Safeguards Specialist, BCA Fund**

The Environmental and Social Safeguards Specialist is the focal point for the management of environmental and social risks within the Executive Management of the BCA Fund. Responsibilities include:

- Review Executors' concept notes and proposals, including checklists, environmental and social assessments, and environmental and social action plans (ESAP).
- Provide technical support to Executors in completing the ESMS tools.
- Serve as the MARR focal point for the BCA Fund, responsible for implementing MARR procedures.
- Conduct field visits, technical monitoring processes, and verification of compliance with ESMS requirements, as warranted.
- Ensure the integration of gender considerations, stakeholder participation, and human rights in project implementation.
- Provide periodic training on the BCA Fund ESMS to relevant stakeholders, including other staff of the Executive Management, the Technical Committee, and members of the Board of Directors, as well as potential Executors.

83. **BCA Fund Governing Board**

It is the strategic governance body that ensures the alignment of the ESMS with the principles of the BCA Fund and with international best practices. Its functions include:

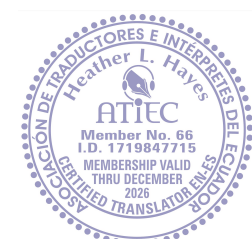
- Review and approve proposals with high environmental and social risks, as well as substantive modifications to the ESMS.
- Serve as an adviser for cases unresolved through the MARR.
- Ensure the integration of the ESMS principles into the overall governance of the BCA Fund.

7. Monitoring and reporting

7.1 Environmental and Social Monitoring Framework

84. The BCA Fund's ESMS requires a structured monitoring and reporting system to oversee compliance, identify risks, and ensure that funded activities meet environmental and social safeguards requirements. Monitoring will be carried out at both the project level (by implementing entities) and the portfolio level (by the Executive Management of the BCA Fund), ensuring transparency, accountability, and continuous learning.

85. The monitoring framework consists of the following components:



- Baseline conditions described in the proposals, the environmental and social assessment, and the ESMP are carried out at the beginning of the project to establish the environmental and social conditions.
- Periodic reports from implementing entities on the implementation of safeguards (ESAP and plans).
- Field visits and audits conducted by the BCA Fund to verify compliance with the measures described in the ESAP (on an ad hoc basis).
- Reporting of incidents and complaints by implementing entities, to identify and address environmental and social concerns.
- Annual review of ESMS performance to assess its effectiveness, identify improvements, and strengthen its performance.

7.2 Project-level reports by Executors

86. Each Executor is responsible for monitoring and reporting on the environmental and social aspects of its project. Implementing entities must submit the following:
- Periodic reports covering progress in the implementation of the Environmental and Social Action Plan (ESAP), stakeholder engagement, and any emerging risks (through tool 3 of the ESMS). This will include the periodic collection of data on the environmental and social indicators defined in its ESAP, as well as facilitated consultations conducted with the community and the grievance log. In the event of substantial risks, or if the project is categorized as large, the minimum reporting frequency will be quarterly. For small and medium grants with moderate or low risks, the minimum reporting frequency will be semiannual.
 - Annual reports providing a comprehensive review of environmental and social results, compliance with ESMS requirements, and lessons learned (including grievance management).
 - Incident reports in the event of environmental or social non-compliance, accidents, or claims.
 - Report on the implementation of the Consent Agreement (available in Annex 5), demonstrating that the Executor has consulted the relevant IPNs regarding any concerns or issues to be raised.

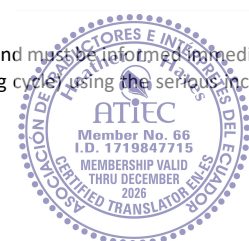
Section on monitoring/reporting on environmental and social management (including implementation of the ESAP) in the Executor's annual report:

*Summarize **the main achievements** in relation to the measures related to the ESMS (using the ESAP monitoring table).*

*In addition, describe below any **difficulties** encountered and/or **changes in the safeguard instruments or measures** during the implementation of the environmental and social safeguards (ESS).*

*Explain in detail any potential **impact**, claim, new risk, adaptive management measure, and lessons learned in relation to the implementation of the BCA Fund ESMS.*¹⁵

¹⁵Please note that, in the event of serious incidents related to environmental and social issues, the BCA Fund must be informed immediately (within 48 hours) and a separate report must be submitted without delay (outside the regular reporting cycle) using the serious incident report template.

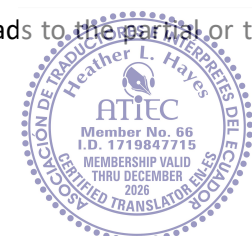


7.3 Reports at the portfolio level

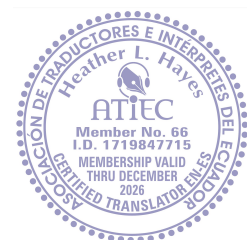
87. The Executive Management of the BCA Fund oversees the environmental and social performance of all financed activities. The BCA Fund will prepare an annual report that will include a section on ESMS reporting, summarizing:
- Implementation of the ESMS in projects by implementing entities.
 - The levels of implementation achieved and the main challenges identified
 - A summary analysis of the complaints received, including their progress and resolutions.
 - Lessons learned and recommendations for improvement to strengthen ESMS implementation.
88. The BCA Fund will also commission external evaluations to assess the effectiveness of the ESMS, as determined by the Board of Directors, at least every three years. These evaluations will seek to independently analyze the effectiveness of the system, identify areas for improvement, and strengthen transparency and accountability.
89. The BCA Fund will also periodically report to the Board of Directors and donors on progress in implementing the ESMS, ensuring accountability.

7.4 Notification of serious incidents

90. The BCA Fund has a mandatory incident notification mechanism for serious environmental and social events, to ensure a rapid, effective, and accountable response to any critical situation that could compromise the integrity of the project, the communities involved, or the environment. Implementing entities must report any serious or moderate incident within 24 hours of its occurrence or once it becomes known. To do so, they must use the standard template provided in annex 8.
91. Key incidents that must be reported include:
- Any incident related to environmental, health, or occupational health and safety aspects, including (but not limited to) any explosion, spill, or workplace accident that results in deaths, serious or multiple injuries, or significant environmental contamination.
 - Accidents involving members of the public or the local community resulting in deaths, serious injuries, or multiple injuries.
 - Sexual harassment or violence involving project personnel.
 - Any social incident, including (but not limited to) any strike or violent labor unrest, or disputes with local communities occurring at or near the works, plants, equipment, or facilities of international organizations, that have or may reasonably have a significant adverse impact on the environment, health, safety, or the social and cultural context. In each case, the nature of the incident or accident and its effects within and outside the workplace must be specified.
 - Any serious threat to public health and safety, inadequate compensation, disruption of natural ecosystems, discriminatory practices (including the right of indigenous peoples to Facilitated Consultation with Consent Agreement).
 - Any report that requires the intervention of law enforcement entities established under the Constitution of the Republic of Ecuador, namely the National Police and the Armed Forces, or other authorities responsible for enforcing the law, including loss of life, sexual violence, forced labor, or child abuse.
 - Any action by the competent authorities or regulatory bodies that leads to the partial or total suspension of project activities.



92. Once an incident has been reported, the BCA Fund will investigate the root causes to determine its severity and will identify the necessary corrective measures. The Executor shall actively cooperate in this assessment, and follow-up reports will be required until the incident is fully resolved and its effects are mitigated.



8. Grievance Redress Mechanism (MARR)

8.1 Background, objectives and scope of application

Background

93. Grievance management is an integral part of the BCA Fund's approach to community engagement and environmental and social safeguards, in line with the Fund's environmental and social requirements.¹⁶
94. A grievance redress mechanism (MARR) is a mechanism for **receiving, addressing, and resolving in a timely manner grievances from parties affected by a project's activities**. A MARR must be flexible, collaborative, and transparent, with the objective of building consensus to resolve issues. Its objective is to provide clarity and predictability on how grievances will be received, assessed, categorized, addressed, and resolved.
95. A MARR is extrajudicial in nature and will promote a constructive approach focused on seeking amicable solutions within the BCA Fund before resorting to external actions. It will offer different ways to manage grievances, such as conciliation, a compliance audit, or a combination of both. A MARR is intended to complement, not replace, formal legal channels for grievance management (for example, the court system, organizational audit mechanisms, etc.). Stakeholders always have the option of pursuing other, more formal alternatives, including legal recourse.

Objective

96. In accordance with the requirements of the relevant international standards, the BCA Fund's MARR has been developed to provide project-affected people with the opportunity to submit any concern, complaint, dispute, or claim (collectively, "claims") related to actual or potential environmental or social harm arising from operations, projects, or activities financed by the BCA Fund.
97. The MARR is the "first line" of response to the concerns of stakeholders that could not be avoided through their proactive engagement. In this context, any individual or group that considers itself negatively affected by the project, or at risk of experiencing adverse impacts, may submit a complaint.

Scope of application

98. Given that site-level activities will be implemented by the Executors, when the ESMS risk assessment has classified the project as Substantial risk (B+) for large or medium grants, the Executors **must provide stakeholders with a grievance redress mechanism or procedure** to address grievances related to the implementation of those activities. In such cases, grievances submitted to the BCA Fund that relate to activities under the responsibility of an Executor must first be addressed through the partner's grievance mechanism or procedure, unless the complainant has a valid reason not to use the partner's "site-level" grievance mechanism or

¹⁶In accordance with IFC Performance Standards 1 and 2, GEF ESSP Minimum Standard 2, and Performance Standard 1 of the Nature Conservancy's Integrated Performance Standards Policies and Procedures for Projects Funded by the Green Climate Fund (GCF) (collectively, "the relevant international standards").

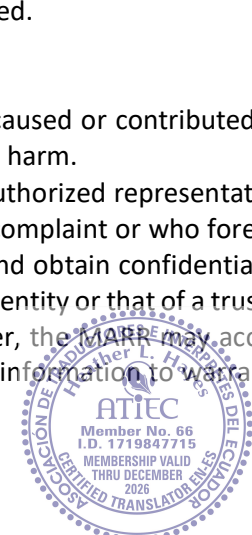


procedure. Reasons for submitting the grievance directly to the BCA Fund MARR may include security concerns, fear of reprisals, grievances related to the Executor, etc.

99. In the case of projects classified as moderate (B) or low (C) risk, grievances may be submitted directly to the BCA Fund’s MARR.
100. Furthermore, stakeholders in substantial-risk (B+) projects under medium or large grants may also access the MARR if a satisfactory resolution of the complaint has not been found or achieved with the recipient organization/partner.
101. The MARR is also designed to provide a channel for complaints regarding program-level activities of the BCA Fund, including the selection of strategic priorities and the oversight/enforcement of ESMS requirements.
102. To ensure its proper functioning, the BCA Fund shall ensure that all project stakeholders are well informed about the existence and operation of the BCA Fund MARR from the outset of information-sharing activities (i.e., prior to the implementation of on-site activities). This will be achieved through the provision of information (through appropriate oral and written communication) and training during the planning and implementation of project activities. Executors and stakeholders will receive information about the MARR and how to access it.
103. The MARR included herein describes the procedure for submitting, receiving, acknowledging receipt of, investigating, resolving, and closing complaints. It also specifies processing time frames, information management, and communication and awareness-raising actions.
104. The MARR will also play a key role in communicating with and reporting to donors (such as the GEF and others) on grievances received and how they were resolved. These reports will be agreed between the donors and the Executive Management of the BCA Fund. The BCA Fund will also communicate donor-specific MARRs (when they exist) and how to access them.

8.2 Eligibility criteria

105. For a complaint to be admissible under the BCA Fund MARR, **it must be related to activities financed by the BCA Fund**. Complaints that fall within the scope and mandate of the MARR include complaints, comments, questions, or concerns regarding how a BCA Fund-financed activity is being carried out. This may take the form of specific complaints about impacts, damage, or harm caused to individuals or their property by the activity; concerns about the stakeholder engagement process leading to the design or implementation of the activity, including how benefits are distributed/allocated; or concerns regarding how previously raised issues related to project activities, or perceived incidents or impacts, have been addressed.
106. Complaints must:
 - Indicate how project activities funded by the BCA Fund have caused or contributed, or may cause or contribute, to social, economic, or environmental harm.
 - Be submitted by a person or persons (directly or through an authorized representative) who may plausibly be affected by the harm mentioned in the complaint or who foresees potential harm to other persons. Complainants may request and obtain confidentiality. Wherever possible, complainants are advised to provide their identity or that of a trusted third party to facilitate communication and follow-up. However, the MARR may accept anonymous complaints if they contain sufficient and verifiable information to warrant a



review. In all cases, the confidentiality of the identity of complainants who so request shall be guaranteed to protect them from possible reprisals.

- The MARR will ensure the confidentiality of complaints to protect users from retaliation. While the identity of the complainant (or a trusted third party) must be collected for communication purposes, it will not be disclosed unless the complainant explicitly authorizes it. Special attention will be given to cases related to sexual exploitation, abuse, and sexual harassment (SEAH).

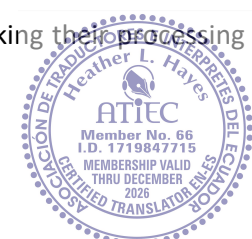
107. If additional information is needed to determine eligibility, the MARR must request it from the claimant before making a decision on the matter. Admissibility does not constitute validation of the claim or imply a commitment to provide remedy; rather, it enables the initial assessment and, where appropriate, dialogue to resolve it.
108. The decision on the eligibility of the claim to be addressed is solely intended to enable an initial assessment and response. It does not imply recognition that the project has caused an impact, nor a commitment to provide the claimant with any specific form of remedy.

In the case of complaints related to category B+ projects in which the Executor has been required to establish its own MARR, the complaints **must first be addressed through the Executor's MARR**, unless there is a valid reason to justify an exception (for example, security concerns, complaints related to the manager, etc.). In such cases, all complaints must indicate what measures the complainant has taken to try to resolve the complaint with the Executor, and the results of those attempts.

Claims submitted by persons who have not made a good faith attempt to resolve their concerns through the beneficiary/partner, or who have not demonstrated a valid reason for not doing so (for example, concerns for their safety, claims regarding the partner, etc.), may be deemed inadmissible by the Executive Management of the BCA Fund and referred directly to the Executor.

8.3 Duties and responsibilities in complaint management

109. **Implementing entities:** Each Executor with a project classified as substantial (B+) (under a medium or large grant) must have a MARR or operating procedure and resolve disputes at the local level to the extent possible (see the guidance in section 3.2.2). As indicated in the eligibility criteria, only complaints that have already been submitted but have not been effectively resolved through the Executor's mechanism will be eligible, unless there is a valid reason for not doing so. **Note:** Even if grievances and complaints are resolved at the project level, the BCA Fund must be notified of the existence and outcome of the grievances if they relate to projects or activities financed by the BCA Fund.
110. **Executive Management:** Establishes and hosts the MARR to receive and respond to grievances through direct engagement with complainants. Ensures the proper functioning of the MARR by coordinating with Executors working at the local level, as well as requesting the intervention of the Board of Directors when necessary. Executive Management, through the ESMS focal point, is responsible for:
- Establishing communication channels to receive grievances from project-affected parties
 - Registering, documenting, and responding to complaints; tracking their processing and the responses provided (maintain the MARR tracking tool).



- Collaborating with complainants, identifying resolution options, and providing or supporting solutions for any environmental or social risk or impact that is demonstrably associated with the project.
- Informing project stakeholders about how to submit a grievance
- Monitoring the resolution of claims and providing information to claimants, as appropriate.
- Coordinating and referring claims to the committee or board, as necessary.
- Providing the Board of Directors with reports on complaints, responses, and outcomes to identify successes, challenges, trends, and lessons learned in the response to complaints.

If the complaint is against the Executive Management, it will be handled directly by the compliance committee.

111. **Compliance Committee:** This committee is composed of members of the Board of Directors and will meet as required. It will provide guidance to the Executive Management when decisions are required on complex or large-scale claims that exceed the Executive Management’s capacity to resolve them. The Compliance Committee will be responsible for:

- Forwarding any complaint received directly by members of the Board to the Executive Management for follow-up.
- Intervening in the resolution of a complaint at the request of the Executive Management, or in the absence of an amicable resolution between the Executive Management and the complainant, through:
 - Reviewing the documentation received from the Executive Management and consulting with it regarding the case.
 - Engaging in dialogue with the claimant to review and clarify the issues raised in the case and exploring options for resolution.
 - Managing the identified risks that could affect the project’s overall governance (for example, the potential need to suspend project components or modify their design), ensuring that Executive Management has all necessary information on the risks and guiding project decision-making on the appropriate response.
 - Defining a course of action to, where possible, resolve the complaint or refer the case to the relevant authority.

112. **Free Public or Private Mediation Center:** may be involved in cases where an agreement or resolution has not been reached between the Executive Management and the complainant, as established in the project grant agreement. In addition, complainants who are not satisfied with the MARR response at the Executive Management level or who are concerned about an unfavorable response may escalate their complaint to a Free Public or Private Mediation Center. The Free Public or Private Mediation Center shall be responsible for:

- Intervening in the resolution of a complaint at the request of the Executive Management or, in the absence of an amicable settlement between the Executive Management and the complainant, through:
 - Facilitating dialogue between the parties to clarify the issues and exploring options for resolution.
 - Acting as a mediator between the parties to seek the resolution of the complaint.
 - Documenting the results of the mediation process through formal minutes signed by both parties.

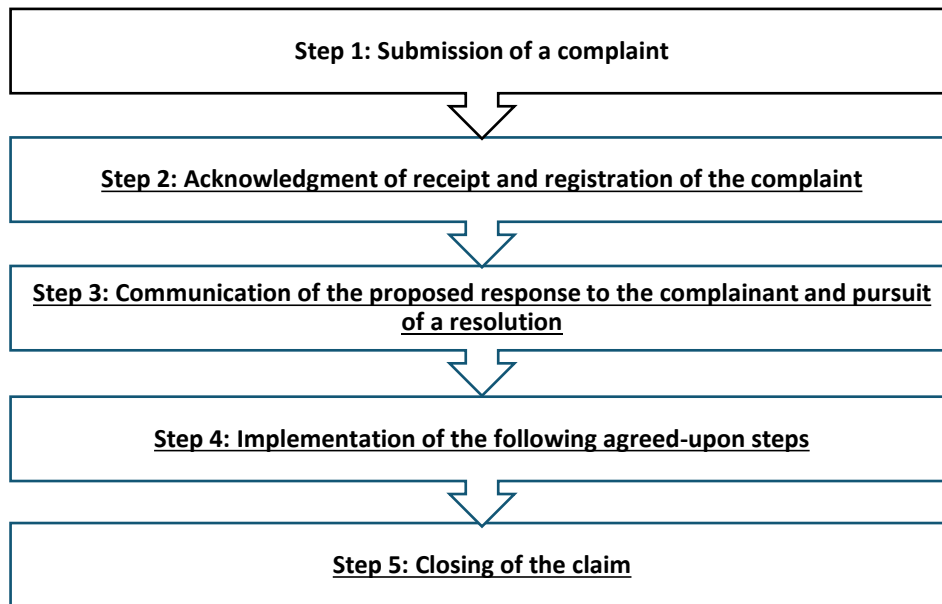
Complaints submitted to the Compliance Committee or the Public Mediation Center shall be processed in accordance with the procedures described in the following sections. The process for handling submitted complaints typically involves the Executive Management and all necessary staff.



8.4 Overview of the MARR process

113. To manage complaints effectively, the BCA Fund has established a procedure and a series of steps, as described below.

Figure 5. Steps in the MARR procedure



Step 1: Submission of a complaint

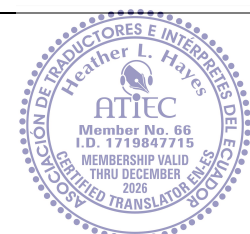
114. The BCA Fund MARR will allow aggrieved stakeholders to submit their grievances through various channels (for example, telephone call, letter, SMS, email, website, meeting, etc.). It is important to note once again that, in the case of site-level activities, complainants are expected to submit their grievances first to the corresponding implementation focal point.
115. Claims may be submitted by completing the form provided in annex 7, which may also be obtained through the Executors working with local communities, at the BCA Fund office, or online on the BCA Fund website, and submitting it to the BCA Fund using one of the methods described below:

MARR contact points:

<https://fondobiocorredoramazonico.org/en/contact/>

atencion.marr@fondobca.org

The MARR contact telephone number will be published in due course in the Terms of Reference for each call for proposals.



Alternatively, the complaint may be submitted verbally, with at least two witnesses, and the BCA Fund will take notes, which will be signed by the complainant and the witnesses.

116. Initially, claimants only need to provide sufficient information to determine their eligibility. If the information provided is insufficient, the MARR is obligated to make a substantial, good-faith effort to contact the claimant and request the additional information needed to determine eligibility and, if the claimant is eligible, prepare a proposed response.
117. In the case of category B+ projects in which the implementing entities process grievances through their own MARR, if the Executor's MARR is not able to decide how to resolve the grievance or reach an agreement with the complainant, the beneficiary may transmit/escalate the grievance to the BCA Fund's MARR. The Executor shall submit the grievance and all relevant documentation from its MARR procedure.

Step 2: Acknowledgment of receipt and registration of the complaint

118. Once received, all complaints will be recorded in a tracking database (MARR registry) by the safeguards specialist on behalf of the Executive Management of the BCA Fund. If another member of the BCA Fund staff or a member of the Board of Directors receives a complaint directly, it will be forwarded to the safeguards specialist for recording. The MARR database will maintain a record of all complaints, from receipt to closure. It will track progress at each step and will serve as the primary reference document for complaint tracking.¹⁷
119. Within five (5) business days of receipt of a complaint, the ESMS focal point will send a written acknowledgment of receipt to the complainant, including the assigned tracking number,¹⁸ informing the complainant that eligibility will be reviewed and, if eligible, an initial organizational response will be issued. This response (format provided in annex 7) will clearly identify a point of contact at the BCA Fund and will provide a brief description of the process to be followed to assess eligibility and issue an initial response.
120. Confidentiality will be ensured for all complainants who request it.

Step 3: Communicating the proposed response to the complainant and seeking a solution

121. After the admissibility assessment and internal discussions (Executive Management/Compliance Committee) on the proposed responses, the ESMS officer will prepare a response to the complainant (within fifteen (15) working days of receipt of the initial complaint). The response will be communicated to the complainant without delay, in writing (and verbally if this constitutes a more effective means of communication), using language that is easily accessible to the complainant. The safeguards specialist may also contact the complainant by telephone or arrange a meeting to review and discuss the initial approach with the complainant.

¹⁷ The GRM database will include information such as: the date on which the request was received; the date on which the written acknowledgment of receipt was sent (and the verbal acknowledgement of receipt, if also provided); the dates and nature of all other communications or meetings with the claimant and other relevant stakeholders; the specific concerns raised in the complaint and any additional information on those concerns provided by the Compliance Committee and any other relevant party (if applicable); the eligibility determination and rationale; the dates of discussions between the claimant and Executive Management staff, and any other relevant party, regarding the proposed resolution/way forward, and the main substantive points of each discussion; the claimant's acceptance of or objections to the proposed resolutions, and the responses of other relevant parties to the proposed resolutions; the proposed next steps in the event that objections arise; the alternative resolution if new dialogue is pursued; notes on the implementation of any agreed resolution; and any conclusions and recommendations arising from follow-up and monitoring.

¹⁸ Verbal acknowledgments may be used for reasons of convenience (and may be recorded), but they must be followed by written acknowledgment.



122. Typically, there will be three types of responses:
- A. Determination that the claim is not eligible for the MARR, either because it does not meet the basic eligibility criteria or because another mechanism is more appropriate.
 - B. Direct action is proposed to address the complaint. After receiving all the necessary information on the complaint, the Executive Management will immediately seek a solution, particularly in cases involving minor issues.
 - C. It is necessary to continue investigating and collaborating with the complainant and other stakeholders to jointly determine the best way to resolve the complaint.
123. If it is determined that the claim is admissible, the Executive Management will respond to the claimant through direct, good-faith engagement to clarify the issues, develop and seek agreement on resolution options, and address and remedy the risks and harms that the project is causing or contributing to.
124. The claimant may or may not agree with the proposed response. If agreement is reached, the project may proceed to implement the proposed response through direct action, a more detailed assessment, or a referral to the Public Mediation Center.
125. If the claimant rejects the proposed response and/or no agreement is reached, the Executive Management shall formalize this matter in writing; the parties involved may then refer the complaint to a free public or private mediation center, to be agreed upon between the parties, for review and case management. The ESMS focal point shall inform the claimant of this new stage. In this case, the Executor shall be required to approach a free public or private mediation center in order to mediate with the claimant and obtain a formal agreement regarding the matter that is the subject of the complaint. Following the signing of the corresponding mediation minutes, the Executor shall inform the Executive Management of both the mediation minutes and a summary of the agreements reached, and the response to the complaint shall be communicated to the claimant for implementation.
126. The Executive Management will specify that, even if the claimant rejects the proposed response, the MARR will remain available if the claimant wishes to revisit the response or raise another concern in the future. It will also inform the claimant of other alternatives that may be available, such as other donor-level MARRs or the use of legal or administrative appeal mechanisms. The Executive Management will document these exchanges.
127. It is important to note that, in sensitive and difficult cases, the MARR may request an agreement to resort to independent assessments, mediation, or arbitration in order to seek an appropriate resolution of the case.

Step 4: Implementation of the following agreed steps

128. When there is agreement between the claimant and the Executive Management to proceed with the proposed measure or with further engagement/investigation, the response shall be implemented.
129. In cases where the initial response is to initiate broader investigations and stakeholder engagement, the assessment process may be carried out by the Executive Management itself, or by consultants or other individuals whom the organization, the complainant, and other



stakeholders consider impartial and effective. The main objective of the investigation and engagement process is to clarify:

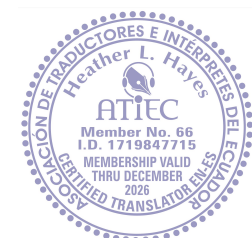
- The issues and facts that gave rise to the complaint.
- The stakeholders involved in those issues and events.
- The opinions, interests, and concerns of stakeholders on relevant issues.
- If key stakeholders are willing and able to participate in a joint, collaborative process (which may include joint fact-finding, dialogue, and/or negotiation) to resolve the issues.
- How stakeholders will be represented and what their decision-making authority will be.
- What work plan and timeframe could stakeholders use to address the issues.
- What resources will be needed and who will provide them.

This step aims to jointly determine the best way to address the complaint and reach an agreement. If the engagement process leads to an agreement on measures to address the complaint, the Executive Management will be responsible for overseeing the implementation of those measures. If not, the procedure may provide for referral to a free public or private mediation center so that the parties can mediate the issues related to the complaint (see step 3).

130. In the case of accepted responses, the Executive Management will be responsible for their implementation and follow-up until all measures agreed upon as part of the resolution have been implemented.
131. All complaints must be resolved within sixty (60) days of initial receipt. If the complaint is not resolved within this period, the Executive Management will offer the complainant the opportunity to refer it to a donor-level MARR and/or to any national institution responsible for addressing the issues raised. In complex cases requiring more time, the BCA Fund may extend this period, duly informing the complainant and justifying the extension. All measures taken will be documented.

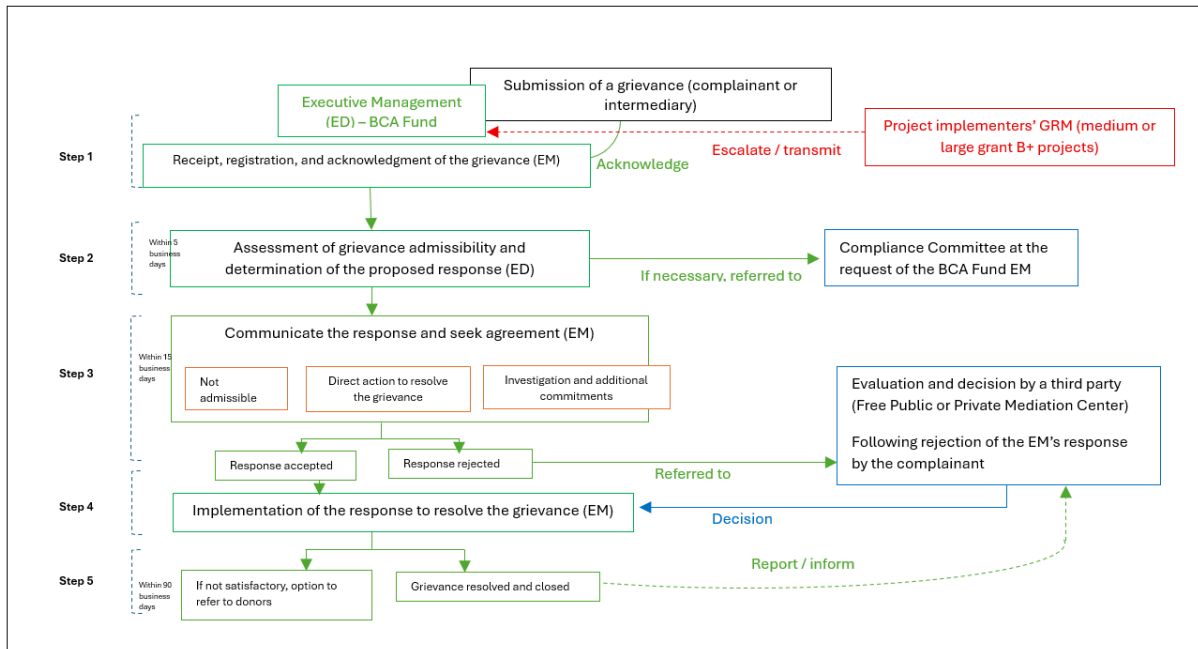
Step 5: Close the grievance

132. The final step is to close the grievance. If the response has been successfully implemented, the ESMS focal point must document the satisfactory resolution, in consultation with the complainant. This will be reflected in the MARR register. Accurate documentation of cases through an electronic database is essential for public accountability, organizational learning, and resource planning. The BCA Fund will agree with donors on the criteria and frequency of reports to be submitted to them on grievances.
133. In cases involving significant risks, repercussions and/or negative publicity, it may be advisable to request written documentation from the complainant indicating satisfaction with the response. In other cases, it will be sufficient for the ESMS focal point to record the measures taken, confirm that the response has been satisfactory to the complainant, and document those facts. In more complex and unusual complaint situations, it may also be useful to document the main lessons learned.
134. If the complaint has not been resolved, the ESMS focal point must document the measures taken, communication with the complainant (and other stakeholders, if a substantial effort has been made to initiate or complete a multi-stakeholder process), and the decisions made by Executive Management and/or the Board and the complainant regarding referral or recourse to other alternatives, including legal remedies.



135. In general, MARR documentation for each case must maintain the confidentiality of details, while aggregated statistics on the number and type of complaints received, measures taken, and results achieved are made public. The Executive Management will provide quarterly reports to the Board on complaints, responses, and results.

Figure 6. Procedure for grievance management in the BCA Fund



9. Training and capacity-building on the ESMS

136. The BCA Fund recognizes that the effective implementation of the ESMS depends on the capacity of its staff, implementing entities, and partners to understand and apply the principles of environmental and social safeguards. To ensure compliance and continuous improvement, the BCA Fund will roll out a structured capacity development program focused on strengthening technical skills, awareness, and institutional knowledge related to environmental and social risk management.

9.1 Training programs for staff and applicants/Executors

Training for BCA Fund staff

137. BCA Fund will provide continuous training to ensure that the staff of the Executive Management, including the environmental and social safeguards specialist, grant managers, and other personnel, have the necessary skills to oversee the implementation of the ESMS. Training topics will include:
- ESMS policies and procedures, including selection, risk categorization, and the planning of mitigation measures.
 - Environmental and social risk assessment methodologies.
 - Monitoring and reporting requirements for ESMS compliance.
 - Stakeholder participation, integration of gender equality, and human rights considerations.
 - Grievance redress mechanism procedures (MARR).

These training sessions will be mandatory for new staff joining the BCA Fund and, in addition, could be organized as annual refresher courses for staff, with specialized sessions when updates are made to the ESMS or relevant policies.

Training for proponents/Executors and the Public Sector Technical Advisory Unit

138. They will receive tailored training sessions to strengthen their capacity to comply with the BCA Fund's environmental and social safeguards requirements. The training will cover:
- Understanding and application of the ESMS, including the roles and responsibilities of implementing entities in applying safeguards and ESMS procedures.
 - How to complete the environmental and social assessment questionnaire and the steps to be taken
 - How to develop the Environmental and Social Action Plan (ESAP) and risk mitigation measures
 - Stakeholder engagement, including best practices for engaging affected communities.
 - Gender equality and social inclusion.
 - Monitoring, reporting, and compliance, including how to submit required reports and monitor ESMS performance.

These training sessions must be mandatory for all Executors at the start of the project (or even before, if potential applicants/Executors are preselected and require training of support to prepare proposals), and follow-up training sessions and annual capacity-building workshops must then be conducted, to reinforce knowledge, share lessons learned, and update content.

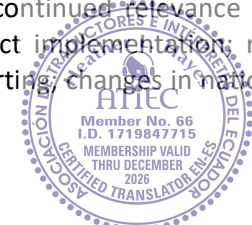


9.2 Capacity-building resources

139. The BCA Fund will develop and disseminate a series of training resources, including:
- A detailed training program for 1 or 2 days, depending on the target audience.
 - PowerPoint presentations covering:
 - An overview of the BCA Fund’s ESMS
 - IFC Performance Standards (content, requirements, and specific examples)
 - The ESMS procedure in the BCA Fund financing cycle
 - Understanding environmental and social risk assessment
 - Understand the requirements of the guided consultation protocol
 - ESAP development
 - MARR
 - Incident reporting
 - Summary of group activities to practice the various components and tools of the ESMS (risk assessment, risk identification and formulation, risk classification, development of mitigation measures, budget preparation, etc.).
140. Other resources may include:
- Procedures for accessing grants from the BCA Fund
 - Detailed manuals and guidance on the BCA Fund ESMS (policies, procedures, and standards)
 - Community Participation Manual and Toolkit for Gender Equality and Social Inclusion.
 - Frequently Asked Questions and Troubleshooting Guides
141. The BCA Fund will evaluate the effectiveness of its training and capacity development efforts. This includes monitoring participation rates in training sessions and workshops, conducting post-training assessments to evaluate knowledge retention and the practical application of skills, and collecting feedback from Executors and staff to identify areas requiring further capacity development. Based on these monitoring results and the gaps identified, training programs will be adjusted accordingly to enhance their impact.
142. The refinement of capacity development initiatives will be an ongoing process, based on several key factors. These include changes in the environmental and social risk landscape, new donor requirements or policy updates, technological advances relevant to environmental and social management, and lessons learned from project implementation and ESMS evaluations.

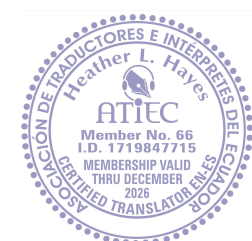
10. Continuous improvement and adaptive management

143. The BCA Fund is committed to ensuring that its ESMS remains effective, relevant, and aligned with international best practices. To achieve this, the BCA Fund adopts an adaptive management approach that enables periodic reviews, the collection of feedback from stakeholders, and continuous learning to strengthen environmental and social safeguards over time.
144. The ESMS will be reviewed and updated periodically to ensure its continued relevance and effectiveness. Updates will be based on lessons learned from project implementation, new environmental and social risks identified through monitoring and reporting, changes in national



and international legal frameworks related to environmental and social safeguards; and donor financing requirements or conditions that require adjustments to safeguard policies.

145. To maintain the system’s alignment with best practices, the Executive Management of the BCA Fund will conduct an annual internal assessment of the ESMS, incorporating lessons learned from ongoing project implementation. In addition, every three years an independent expert-led formal external review and evaluation will be conducted to assess its overall effectiveness and identify opportunities for improvement.
146. The participation of stakeholders will be an integral part of the ESMS update process. Feedback from Executors, communities and social actors involved in the interventions, government agencies, donor organizations, and technical partners of the BCA Fund will be actively incorporated to improve the system’s responsiveness, as well as strengthen the relevance, legitimacy, and applicability of the ESMS.
147. The BCA Fund recognizes that environmental and social risk management is a continuous learning process. To institutionalize learning:
 - Annual lessons learned workshops will be held with Executors and partners.
 - Case studies on best practices and challenges in implementing the ESMS will be documented.
 - Knowledge exchange platforms will be developed to facilitate peer-to-peer learning among Executors.
148. Adaptive management ensures that the ESMS continues to respond to evolving environmental, social, and operational contexts. Key strategies include:
 - Flexibility in the ESMS procedures to adapt to the unique contexts of each project, while maintaining safeguard standards.
 - Real-time adjustments to risk management measures if monitoring data or incident reports indicate the need for corrective measures.
 - Capacity development initiatives to strengthen the capacity of the BCA Fund personnel and Executors to effectively implement evolving ESMS requirements.



ESMS Annexes

Annex 1: ESMS Tools

Annex 2: Exclusion List

Annex 3: Guidance on risk categorization

Annex 4: National legal and regulatory framework on indigenous peoples, communities, and nationalities

Annex 5: Facilitated Consultation Protocol with a Consent Agreement

Annex 6: Checklist for the implementation of the Facilitated Consultation Protocol with a Consent Agreement

Annex 7: MARR grievance intake forms

Annex 8: Serious Incident Notification Form

Annex 9: Environmental and Social Review Note

Annex 10: Risk management plan templates (gender, stakeholders, biodiversity, and alternative livelihoods)

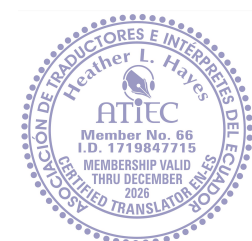
Annex 11: Environmental and Social Code of Practice (ESCOP)



Annex 1: ESMS Tools

All ESMS tools are consolidated in an Excel file attached to this ESMS.
The ESMS tools include:

- ESMS Tool 1: Checklist of Excluded Activities
- ESMS Tool 2: Environmental and Social Assessment Questionnaire
- ESMS Tool 3: Environmental and Social Action Plan



Annex 2: Exclusion List

The BCA Fund exclusion list is based on the following¹⁹ :

- The Nature Conservancy, 2025, Exclusion List.
- International Finance Corporation (IFC), 2007, Exclusion List.
- World Bank, 2025, Exclusion List.
- Banco Interamericano de Desarrollo (IDB), 2020, Exclusion List

1	Prohibited activities or those considered illegal under international treaties signed by the Republic of Ecuador
2	Activities that use forced labor, child labor, or exploitative labor practices, including any form of involuntary or compulsory labor (for example, bonded labor, labor under conditions of servitude, forced labor).
3	Activities that promote or exacerbate violence, discrimination, or reprisals; that discourage workers' representation or collective bargaining; or that create exploitative conditions.
4	Activities involving the arming of park rangers and security personnel, as well as activities involving the direct employment of armed security personnel.
5	Activities involving forced evictions or the involuntary resettlement of communities.
6	Activities resulting in the conversion or degradation of High Conservation Value Areas or critical ecosystems, or that significantly alter potentially important biodiversity. In particular, activities involving a clear risk of significant land-use change or the loss of natural areas such as wetlands and upland forests, which mitigate the effects of natural hazards such as floods and landslides, or actions that increase vulnerability to natural hazards and compromise community safety.
7	Activities that lead to large-scale or unsustainable exploitation of natural resources, including wild fauna and flora, timber, and non-timber forest products (NTFPs), or that involve the use and/or acquisition of wild fauna and flora or products regulated under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).
8	Activities involving the use, production, trade, or acquisition of: <ul style="list-style-type: none"> (a) Highly hazardous chemicals or pesticides, including those specified as persistent organic pollutants (POPs) under the Stockholm Convention, products classified by WHO as Classes IA and IB, or Class II products, unless used exclusively by specially trained personnel with appropriate personal protective equipment; (b) Materials considered illegal under the legislation or regulations of the host country or under international conventions and agreements, including (inter alia) the manufacture, trade, or use of hazardous chemicals and materials subject to international bans or phase-outs, or those with characteristics of environmental persistence, bioaccumulation potential, or ozone depletion potential; and (c) Any activity that generates contaminants transported through air, water, or soil that pose unacceptable environmental or human health risks.

¹⁹The Nature Conservancy, 2025, TNC Customized Restrictions, <https://www.nature.org/en-us/about-us/who-we-are/how-we-work/finance-investing/office-of-investments/>

World Bank Group, MIGA Guarantees, 2025, Exclusion List, <https://www.miga.org/guidelines-policy>

IBRD (International Bank for Reconstruction and Development), World Bank, Sustainable Development Bond Framework, 2021, <https://thedocs.worldbank.org/en/doc/43b360bfda1e6e5b8a094ef2ce4dff2a-0340012021/original/World-Bank-IBRD-Sustainable-Development-Bond-Framework.pdf>

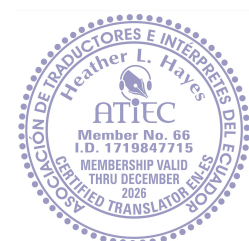
IFC, Environmental and Social Review Procedure Manual, 2016 <https://www.ifc.org/en/insights-reports/2016/publications-policy-esrp>

IFC Exclusion List, 2007, <https://www.ifc.org/en/what-we-do/sector-expertise/sustainability/ifc-exclusion-list-2007>

Grupo KfW, Exclusion List, 2023, https://www.kfw.de/PDF/Download-Center/Konzernthemen/Nachhaltigkeit/Exclusionliste_EU.pdf



9	Activities that deliberately introduce invasive alien species into the project area or the surrounding region, promote their spread, or increase their competitiveness relative to native flora and fauna
10	Activities that result in the destruction, alteration, or disturbance of any cultural heritage (tangible or intangible) without mitigation measures and, where applicable, without the consent of the affected communities, in particular Indigenous Peoples.



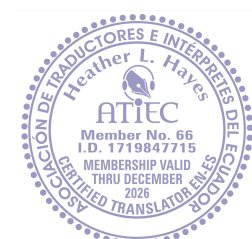
Annex 3: Guidance on risk categorization

The table for determining the environmental and social risk category is as follows (also available in the ESMS Tool):

Impact	Negligible (1)	Minor (2)	Moderate (3)	Extensive (4)
Probability				
Expected (4)	Moderate	Substantial	Substantial	High
Probable (3)	Moderate	Moderate	Substantial	Substantial
Possible (2)	Low	Moderate	Moderate	Substantial
Improbable (1)	Low	Low	Moderate	Moderate

Definition and general description of each risk category:

Significance	Definition	Description
Low (C)	The impact poses a negligible risk to people and the environment, whether in the short or long term.	Negligible or very minor adverse impacts on communities, individuals and/or the environment.
Moderate (B)	The impact is short-term and poses limited risk to people and the environment.	Limited impact in terms of magnitude (for example, small area affected, low number of people affected) and duration (short); can be easily avoided, managed, and/or mitigated through good practice techniques.
Substantial (B+)	The impacts raise substantial concern and may cause long-term social and environmental problems.	Significant adverse impacts on people and/or the environment in terms of magnitude, spatial extent, and duration (but still mostly temporary and reversible).
High (A)	The impact is long-term, large-scale, irreversible, wide-ranging and unprecedented.	Highly significant adverse impacts on human populations and/or the environment. Adverse impacts that are high in magnitude and/or spatial extent (for example, a large geographic area, a large number of people, transboundary impacts, cumulative impacts) and duration (for example, long term, permanent and/or irreversible); affected areas include areas of high value and sensitivity (for example, valuable ecosystems, critical habitats); adverse impacts on the rights, lands, resources, and territories of Indigenous Peoples; involve significant displacement (economic and/or physical).



Annex 4: National regulatory framework on indigenous communities, peoples, and indigenous nationalities, and alignment of the ESMS with IFC Performance Standard 7

In line with the framework presented for the ESMS of the BCA Program, the applicable regulatory framework is described below, in accordance with the standards related to Indigenous Peoples and local communities.

Principle: Indigenous Peoples

Within the guiding principles for BCA management, the issue of “indigenous peoples” must be addressed holistically, emphasizing the necessary and appropriate safeguards to protect and ensure their identity, traditional knowledge, non-discrimination, self-determination, fair and equitable benefit-sharing, compensation, full and effective participation, and free, prior and informed consultation.

Identity

The Constitution of Ecuador (article 56) recognizes Indigenous communities, peoples, and nationalities as part of the Ecuadorian State, which is one and indivisible; in accordance with this, the Organic Code of Territorial Organization, Autonomy and Decentralization describes communes, communities, and *recintos* (neighborhood districts) as forms of ancestral territorial organization where collective land ownership exists. These figures are considered basic units for citizen participation in decentralized autonomous governments and in the National Decentralized Planning System, and through this system, what are known as “Life Plans of Indigenous Peoples and Nationalities” are linked as their own territorial planning instruments.

It is worth noting some concepts defined in the Regulation on the Legal Registration of Nations, Peoples and Indigenous Nationalities of Ecuador,²⁰ Article 4:

- Indigenous Nations: Historical entities with Indigenous ways of life and institutions, with the capacity for self-government in a specific territory.
- Indigenous Nationalities: Historical entities with their own language and culture, governed by their own authorities and customary law. They are characterized by their cultural identity, social organization, and their own institutions.
- Indigenous Peoples: Entities comprising ancestral communities with similar cultural identities, a common language with dialectal differences, and governed by their institutions and customary law.
- Indigenous Communes or Communities: Territorial organizations based on ancestral heritage and community practice, where community governance is exercised through their own authorities and a collective way of life based on reciprocity and solidarity is maintained.

Self-Determination

According to the Constitution, the State guarantees communes, communities, indigenous peoples, and indigenous nationalities the right to individual and collective identity; to freely maintain, develop, and strengthen their identity, ancestral traditions, and forms of organization; to build and maintain their cultural identity; and to decide their membership in one or more cultural communities. It also

²⁰Council of Indigenous Nationalities and Peoples of Ecuador, Resolution 12, Official Register 604, December 25, 2014



guarantees the right to freely maintain and develop their forms of social organization, as well as the right to free, prior, and informed consultation and to the preservation of their forms of coexistence and social organization in recognized territories and community lands under ancestral possession. Ancestral, indigenous, Afro-Ecuadorian, and *montubio* peoples, are empowered to establish territorial districts to preserve their culture. The Constitution also provides that indigenous authorities shall exercise jurisdictional functions based on their traditions and customary law, ensuring the participation of women and respect for decisions of indigenous jurisdiction, subject to constitutional review.

Non-Discrimination

The Ecuadorian legal framework establishes equality and non-discrimination as a primary duty of the State and decentralized governments in all areas, guaranteeing the exercise of individual and collective rights. Specifically, the Constitution (Art. 3, 1) requires the State to guarantee the exercise of constitutional and international rights without discrimination, a principle that the Organic Law of Rural Lands and Ancestral Territories (Art. 25) extends to access to rural land, ensuring formal and substantive equality. In addition, the Organic Code of Territorial Organization (Art. 4, b) requires the Decentralized Autonomous Governments (GAD) to ensure these rights without distinction. To oversee and actively promote this principle, the Organic Law of the National Councils for Equality establishes that these bodies must safeguard equality and non-discrimination to strengthen national unity in diversity, designating the National Council for the Equality of Peoples and Nationalities as the body directly responsible for ensuring the rights of indigenous, Afro-Ecuadorian, and *montubio* communities.

Traditional Knowledge and its Protection

The Ecuadorian regulatory framework, particularly through the Código Orgánico de la Economía Social de los Conocimientos (COESCCI - Organic Code of the Social Economy of Knowledge) (Art. 511), establishes that traditional knowledge constitutes the valuable cultural heritage of peoples and communities, defined as the set of practices, methods, experiences, capacities, signs, and symbols. This knowledge, transmitted from generation to generation, has profound cultural and practical value and encompasses a wide range of areas that are vital to the community, including ecological, climatic, agricultural, medicinal, artistic, artisanal, fishing, and hunting aspects.

The COESCCI establishes comprehensive protection for traditional knowledge, recognizing it as collective heritage and guaranteeing the rights of rights holders without the need for formal registration; it details the types of knowledge to be protected, ranging from therapeutic methods and biological compounds to agricultural practices and cultural expressions. This is aligned with the Nagoya Protocol, which requires that access to any traditional knowledge associated with genetic resources of indigenous and local communities may occur only with their prior informed consent or approval.

Fair and Equitable Sharing of Benefits

This constitutes a fundamental principle for sustainable development and resource management. The Constitution places on the State the duty to promote sustainable development and the redistribution of resources, while protecting natural and cultural heritage. This obligation is reinforced by the Código Orgánico del Ambiente (Organic Code of the Environment), which requires that sustainable development incorporate participation and equity in the distribution of economic and social benefits with communities, indigenous peoples, and indigenous nationalities. The Code assigns the National Environmental Authority responsibility for regulating biotrade to ensure the fair and equitable sharing



of its benefits and even provides for compensation for those who contribute to ecosystem conservation. At the international level, the Nagoya Protocol, ratified by Ecuador, requires that benefits arising from the utilization of genetic resources and ancestral knowledge be shared fairly with communities. Finally, other laws such as the Ley de Tierras Rurales (Rural Lands Law) and the **Ley Orgánica para la Planificación Integral de la Circunscripción Territorial Especial Amazónica (Organic Code for the Comprehensive Planning of the Special Amazon Territorial District)** complement this approach by requiring safe production conditions and promoting equity in the distribution of surpluses (Ley de Economía Popular y Solidaria – Law of the Popular and Solidarity Economy).

Full, Effective Participation

The Ecuadorian legal framework broadly guarantees the right of communes, communities, indigenous peoples, and nationalities to participate in the definition of public policies and in decision-making, especially on matters affecting their territories and the environment. The Constitution and the Organic Code of the Environment establish as a duty of the State to ensure participation in the formulation, implementation, and oversight of environmental policies and to incorporate the views of affected populations into Environmental Studies. This participation is reinforced by the Ley Orgánica de Participación Ciudadana (Organic Law of Citizen Participation), which seeks to strengthen indigenous organizational structures and establishes mechanisms such as the Asamblea Ciudadana Plurinacional e Intercultural (Plurinational and Intercultural Citizen Assembly) for dialogue. In addition, sectoral laws and guidelines such as REDD+ and the Ley de la Circunscripción Territorial Amazónica (Amazon Territorial District Law) require that planning and consultation processes be culturally appropriate, recognizing and guaranteeing the collective rights of the communities involved.

Prior Consultation and Free, Prior and Informed Consent

Prior, Free and Informed Consultation constitutes a fundamental collective right guaranteed by the Constitution del Ecuador for Indigenous communities, peoples, and nationalities. Its application is linked to the formulation of plans and programs for the prospecting, extraction, and commercialization of non-renewable resources in their territories that may cause environmental or cultural impacts. The Organic Law of Citizen Participation and the Constitution specify that, if the competent authorities fail to obtain the consent of the collective rights holder consulted, the decision on the project must be made in accordance with the principles and procedures established by the Constitution and the law. This process ensures that communities' voices are heard in critical decisions that directly affect their lives and ancestral environment.

Ecuadorian legislation extends the right to participate in the environmental consultation process to the general population. The Environmental Authority has the specific responsibility to inform and consult affected communities on projects, works, or activities in order to incorporate their opinions and observations into the Environmental Studies. A key point is that, if the consultation results in majority opposition, the decision on whether to implement the project is taken through a duly reasoned resolution by the competent higher administrative authority.

Although the Constitution recognizes and guarantees the right to free, prior, and informed consultation, Ecuador has signed and ratified international instruments related to human rights protection standards, such as International Labour Organization Convention No. 169, which in Article 6 refers to consultation as a mechanism to “reach agreement or obtain consent regarding proposed measures.” In line with this, the United Nations Declaration on the Rights of Indigenous Peoples states that “States shall consult and cooperate in good faith with the indigenous peoples concerned through their own representative institutions in order to obtain their free and informed consent prior to approving any project affecting their lands or territories and other resources, particularly in



connection with the development, use, or exploitation of mineral, water, or other resources.” Accordingly, consent becomes essential to ensuring the collective rights of Indigenous Peoples.

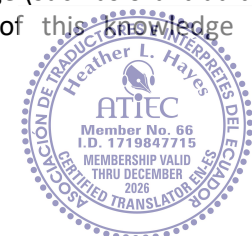
In the country, in operational terms, the National Consultation Guide for the Implementation of REDD+ Actions in Collective Lands or Territories defines the scope, characteristics, responsible parties, and procedure for CPLI with communities, peoples, and Indigenous nationalities. It stipulates that Executors of REDD+ actions must provide the collective with clear, accurate, simple, transparent, and culturally appropriate information on REDD+ and on the actions proposed for implementation on their land or territory. The Guide notes that efforts should be made to ensure that the collective has access to appropriate information on the technical and financial feasibility of REDD+ actions. It highlights the need to document input from communities, peoples, and Indigenous nationalities in order to align REDD+ actions with the needs of the collective. The Executor may have a preliminary REDD+ action proposal developed internally or in collaboration with actors from the collective. The proposal will be reviewed and adjusted based on the information meetings and input received during these meetings. It further stipulates that information on the REDD+ activity or action to be implemented must be provided by the Executor in information meetings prior to the collective’s discussion and decision-making phases, with the aim of receiving input and suggestions to adjust the actions to the collective’s needs. The timeframes for analyzing the information, according to the Guide, will be determined in accordance with the collective’s customs.

Principle: Cultural Heritage

The Constitution of the Republic of Ecuador establishes shared responsibility between the State and the public for the protection and safeguarding of cultural heritage, which is vital to national identity. Cultural heritage assets are defined as inalienable, not subject to seizure, and not subject to statutes of limitation, granting the State a right of first refusal (priority of acquisition) to ensure their preservation; any damage to these assets is punishable. Article 379 provides an exhaustive description of the categories that constitute this heritage, including languages, oral traditions, and cultural expressions (ritual, festive, and productive); buildings, monuments, and landscapes with historical or artistic value; documents, collections, and archives; and artistic, scientific, and technological creations.

The State has the primary obligation to identify, safeguard, conserve, disseminate, and enhance this cultural heritage, both tangible and intangible, while actively promoting the country’s cultural diversity and collective memory (Art. 380). This framework is complemented by recognition of the collective rights of indigenous communities, peoples, and nationalities (Art. 57), ensuring the protection of their identity, practices, forms of organization, and ancestral knowledge. This legislation is aligned with the concept of Buen Vivir, ensuring that individuals have the right to preserve and express their cultural identity and to access their heritage.

To ensure implementation of these mandates, Ecuadorian legislation delegates specific responsibilities and establishes management entities. The Código Orgánico de Organización Territorial, Autonomía y Descentralización (COOTAD – Organic Code of Territorial Organization, Autonomy, and Decentralization) assigns municipal Gobiernos Autónomos Descentralizados (GAD – Decentralized Autonomous Governments) responsibility for preserving, maintaining, and promoting heritage within their jurisdictions. At the national level, the Ley de Patrimonio Cultural (Cultural Heritage Law) establishes the Instituto Nacional de Patrimonio Cultural (INPC – National Institute for Cultural Heritage), which is responsible for research, conservation, and the preparation of inventories. In addition, the Instructivo de Patrimonio Cultural Inmaterial (Instructional Guideline on Cultural Heritage) establishes the procedure for the declaration of intangible heritage (such as oral traditions and artisanal techniques), explicitly prohibiting the misappropriation of this knowledge and emphasizing the protection of community-based creativity.



Land Acquisition and Involuntary Resettlement (Standard 5)

The Constitution of Ecuador establishes a robust legal framework centered on the protection of territorial and cultural rights, with particular emphasis on Indigenous and ancestral communities. The legal framework guarantees that Indigenous peoples cannot be arbitrarily displaced from their ancestral lands (Art. 57, 11). Furthermore, in the area of autonomy and cultural preservation, Indigenous peoples are granted the right to establish special territorial districts to preserve their identity, and the legal status of communes with collective ownership is recognized (Art. 60). A fundamental pillar is the right to free, prior, and informed consultation (Art. 57, 7) before the implementation of projects that use non-renewable resources in their territories, and it also guarantees their right to receive fair compensation for any sociocultural or environmental impacts generated by such projects. It also addresses the protection of persons already displaced or at risk of displacement, prohibiting forced or arbitrary relocations (Art. 42). For those who have been displaced, the Constitution ensures access to essential basic rights, including food, shelter, housing, and medical care. Likewise, it guarantees the right to voluntary, safe, and dignified return to places of origin. Complementing territorial protection, it recognizes the right of Indigenous communities to conserve, develop, and promote their ancestral practices for the management of biodiversity and the natural environment (Art. 57, 8), linking the protection of nature with the cultural survival of these peoples.

The Organic Law on Rural Lands and Ancestral Territories and its Regulations complement constitutional protections by defining ancestral possession and ownership as the physical space where a community has developed its cultural and economic identity. This law essentially guarantees Indigenous communities, peoples, and nationalities the right to preserve collective ownership and maintain possession of their ancestral lands and territories. To reinforce these rights, the law prohibits the displacement or eviction of local inhabitants resulting from contracts related to rural lands. It further establishes that the National Agrarian Authority is responsible for facilitating access to credit and training for land titling and redistribution, and it officially recognizes ancestral possession as a form of territorial occupation supported by the State. With regard to expropriation, the law regulates it strictly and, crucially, excludes ancestral lands and protected areas from this process. With regard to invasions, eviction from rural lands is permitted, but always with the obligation to guarantee preexisting human rights and collective rights. The Regulations detail the expropriation procedure for the regularization of privately held ancestral territories (if there is no direct agreement) and set a deadline for establishing the process of delimitation and allocation of ancestral lands within protected areas, whose jurisdiction falls under the National Environmental Authority.

The foregoing is aligned with the provisions of the Código Orgánico del Ambiente (COA – Organic Code of the Environment), which vests the National Environmental Authority with the authority to demarcate and allocate land within the National Forest Heritage and the National Protected Areas System - SNAP, establishes the conditions for legalizing land in these areas under regularization and/or territorial titling mechanisms, and defines the authority to resolve land-legalization disputes. Additionally, the Protocol issued by Resolution 9 of Official Gazette 916 of March 20, 2013, regulates the procedure for the allocation and titling of rural land under the authority of the National Agrarian Authority, provided that such rural land is located outside the Forest Heritage and the SNAP -that is, outside the jurisdiction of the National Environmental Authority.

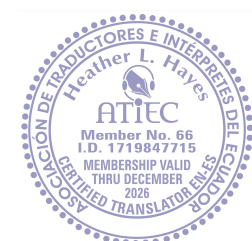
The Organic Law of Citizen Participation reinforces the fundamental collective right to free, prior, and informed consultation, which must be conducted within a reasonable time frame. In the specific context of plans and programs related to the search for, exploitation, and sale of non-renewable resources located in their lands and territories, the law establishes specific rights and safeguards for



communes, communities, indigenous peoples and nationalities, as well as for the Afro-Ecuadorian and *Montubio* peoples:

1. Benefit Sharing: These peoples, acting through their legitimate authorities, have the right to participate in the benefits generated by those projects.
2. Compensation for Harm: They must also receive compensation for any social, cultural, and environmental harm that these plans may cause them.

The law emphasizes that the consultation, which must be conducted by the competent authorities, is mandatory and must be carried out in a timely manner. Finally, it clarifies that, if the consent of the consulted peoples is not obtained, subsequent actions by the authorities must strictly comply with the Constitution and the applicable laws.



Comparative analysis of the BCA Fund ESMS and IFC Performance Standard 7 (Indigenous Peoples)

This matrix demonstrates how each requirement set out in paragraphs 13 to 20 of IFC PS7 is addressed within the Environmental and Social Management System (ESMS) of the BCA Fund.

Paragraph PS7	Summary of the requirement	Relevant provision(s) of the ESMS	Evaluation
<p>PS7, paragraph 13 (<i>Land under traditional ownership/customary use</i>)</p>	<p>Recognizes that IPNs may not hold legal title, but use land for livelihood, cultural, ceremonial, and spiritual purposes. Such use may be substantiated and documented.</p>	<p>ESMS Provisions: Para. 60: The ESMS recognizes the collective rights of Indigenous Peoples (nationalities, peoples and communes) in the Ecuadorian Amazon as distinct from the State’s property rights, in accordance with Constitution Art. 57 and the COOTAD. Annex 4: The extensive mapping of the national legal and regulatory framework covers rights to identity and collective territory (Arts. 56, 57 of the Constitution; COOTAD; Rural Land Law), including customary/possessory rights and regularized possession. Para. 62(f): Full respect for regularized possession and ownership of Indigenous territories, including consideration of regulations for titling in protected areas.</p>	<p>Complies. The ESMS explicitly recognizes the collective territorial connection and customary land use rights under Ecuadorian constitutional and statutory law.</p>
<p>PS7 paragraph 14 (<i>Steps when the project is located on IPN lands with expected adverse impacts</i>)</p>	<p>If the project is located on lands under traditional ownership/customary use and adverse impacts are expected, the client must: (a) document efforts to avoid/minimize the land area; (b) document efforts to avoid/minimize impacts on natural resources; (c) identify all property rights and traditional uses of resources; (d) assess resource use in a gender-inclusive manner; (e) inform the IPN</p>	<p>Para. 62: The ESMS directly incorporates the requirements of PS7. CPLI is required when IPs are proponents, partners, beneficiaries, or potentially affected parties to subprojects. Para. 62(a): Preference is given to the life plans of IPs; CPLI is required when applicable. Para. 62(b): CPLI is required for projects in ancestral territories; the Protocol in Annex 5 must be complied with. Para. 62(g): No physical</p>	<p>Complies. The ESMS addresses most of the sub-requirements, including impact avoidance, CPLI, property rights, compensation, benefit sharing, and access rights.</p>

	of their land rights under national law; (f) offer compensation and due process, including land-based compensation, continued access to resources, equitable benefit sharing, and access/transit rights.	displacement or resettlement of IPs — prohibited as a violation of constitutional rights; the BCA Fund will not finance such actions. Para. 62(k): Equitable access to natural and genetic resources; equitable sharing of benefits. Note: The assessment of resource use with a gender perspective is addressed through the general provisions on gender mainstreaming in other parts of the ESMS.	
Paragraph PS7 15 <i>(Relocation of Indigenous Peoples from traditional/customary lands)</i>	The client must consider viable alternative designs to avoid relocation. If relocation is unavoidable, CPLI must be obtained. Relocation must comply with PS5. Where possible, Indigenous Peoples must be able to return if the cause of the relocation ceases.	Para. 62(g): The physical displacement or resettlement of IPN is categorically prohibited as a violation of constitutional rights (Art. 57, para. 11; Art. 60). The BCA Fund will not finance any subproject that entails the physical relocation of indigenous peoples. Exclusion list item 10: Activities that entail the removal or alteration of cultural heritage without adequate mitigation measures or the consent of the IPN are excluded from financing.	Addressed. Instead of simply requiring CPLI for relocation, the ESMS treats the physical displacement of IPPs as a categorical exclusion, in accordance with Ecuador's constitutional prohibition.
PS7, paragraph 16 <i>(Critical cultural heritage of the IPN)</i>	When a project may significantly affect critical cultural heritage that is essential to the identity and cultural, ceremonial, or spiritual life of IPNs, the priority is to avoid it. If it is unavoidable, CPLI must be obtained.	Para. 62(l): The collective cultural heritage rights of the IPN must be respected; Free, Prior and Informed Consent (CPLI) is required for any activity that affects cultural heritage. Annex 4: The cultural heritage section covers Arts. 379, 380 and 57 of the Constitution; COOTAD; Ley de Patrimonio Cultural; INPC; establishing the national protection framework. Para. 62(m): The mechanisms for the voluntary deposit of ancestral practices and knowledge must be communicated to the IPN, protecting intangible cultural heritage. Exclusion list item 10: Activities that remove or alter cultural	Complies. The ESMS requires CPLI for any activity that affects the cultural heritage of the IPN, includes references to the national legal framework, and categorically excludes activities that alter cultural heritage without consent.

		heritage without the CPLI of the IPN are excluded from financing by the BCA Fund.	
PS7, paragraph 17 <i>(Commercial use of Indigenous Peoples' cultural heritage/knowledge)</i>	Where the project proposes to use the cultural heritage, knowledge, innovations, or practices of the IPN for commercial purposes, the client must inform the IPN of their rights under national law and of the scope and nature of the proposed use.	Para. 62(j): The standards on participatory governance, genetic resources, bioenterprises, benefit-sharing, biodiversity and biotrade must be observed by all subproject proponents. Para. 62(k): Equitable access to natural and genetic resources; equitable benefit-sharing mechanisms are required. Para. 62(l): CPLI is required for the use of cultural heritage; international standards apply where national law does not provide for it. Para. 62(m): Voluntary deposit mechanisms must be communicated to the NPIs before any commercialization. Annex 4: The traditional knowledge section (Nagoya Protocol) and equitable benefit-sharing establish the legal basis for commercial use scenarios.	Complies. The ESMS addresses the commercial use of Indigenous Peoples' knowledge by aligning with the Nagoya Protocol, benefit-sharing requirements, CPLI obligations, and voluntary deposit mechanisms.
Paragraph PS7 18 <i>(Mitigation measures and development benefits)</i>	The client and affected IPN communities will jointly identify mitigation measures in accordance with the PS1 mitigation hierarchy and opportunities for culturally appropriate and sustainable development benefits. The client will ensure the timely and equitable delivery of the agreed measures.	Para. 62: The ESMS requirements are integrated directly so that CPLI procedures and mitigation plans are agreed with IPPs as an integral part of subproject preparation. Para. 62(a): Preference is given to IPPs' life plans as the basis for development benefits. Para. 62(n): Grievance mechanisms must provide clear, culturally appropriate, and validated information to IPPs, including follow-up on agreed measures. Para. 62(p): Following consent, periodic feedback is sought from IPPs and the BCA Fund is kept informed. Annex 5: The Protocol provides a step-by-step procedure for achieving agreed and documented outcomes with IPPs. Annex 6: The	Complies. The ESMS requires measures agreed jointly through the CPLI protocol, prioritizes the life plans of IPN as the basis for development benefits, and requires post-consent monitoring of delivery.

		checklist details the circumstances under which CPLI is required and tracks delivery commitments.	
Paragraph PS7 19 <i>(Compensation mechanisms and benefit-sharing arrangements)</i>	Compensation and benefit-sharing must take into account the laws, institutions, and customs of the IPNs, as well as their level of interaction with society at large. Eligibility may be individual or collective. When it is collective, mechanisms must be in place to ensure effective distribution to all.	Párr. 62(c): Respect for the social organization and governance models of the IPN, ensuring that compensation and benefit-sharing mechanisms are aligned with IPN institutions. Párr. 62(h): Guarantee of collective property rights as the default eligibility criterion. Párr. 62(k): Equitable access and equitable distribution of benefits; mechanisms must be agreed with the IPN. Párr. 62(o): Executors must formally declare their awareness of collective rights (Art. 57 of the Constitution). Anexo 5: The model consent agreement provides a documented record of compensation and benefit-sharing agreements.	Complies. The ESMS establishes collective rights as the baseline, requires compensation mechanisms aligned with the governance structures of the IPN, and uses the consent agreement as a documented instrument.
PS7 Paragraph 20 (Benefits for development: nature and form)	The nature of development benefits is determined by the type of project, the context, and the vulnerability of affected IPN communities. The benefits must address the objectives and preferences of IPN, improve livelihoods in a culturally appropriate manner, and promote the long-term sustainability of the natural resources on which IPN depend.	Para. 60: The BCA Fund is structured to support and guarantee the effective exercise of the collective rights of the IPN in the Ecuadorian Amazon. Para. 62(a): Preference for the IPN life plans as the guiding framework for defining development goals. Para. 62(j): Standards on biodiversity, biotrade, bioenterprises, and the sharing of benefits from ecosystem services must be observed, with due attention to long-term sustainability. Para. 62(k): Equitable access to natural and genetic resources; benefit-sharing mechanisms. Annex 4: The section on full and effective participation ensures that the IPN define the development benefits they receive.	Complies. The ESMS focuses on the life plans of the IPN as a vehicle for culturally appropriate development benefits, requires the sustainable use of natural resources, and structurally positions the BCA Fund as a vehicle for development defined by the IPN.

Annex 5: Facilitated Consultation Protocol with a Consent Agreement

1. Introduction

Article 57 of the Constitution of Ecuador recognizes and guarantees the collective rights of indigenous communities, peoples, and nationalities, which are closely linked to their territories, practices, customs, knowledge, and ancestral wisdom. It incorporates international human rights instruments for the protection and guarantee of human rights into the national legal framework, including the United Nations Declaration on the Rights of Indigenous Peoples.

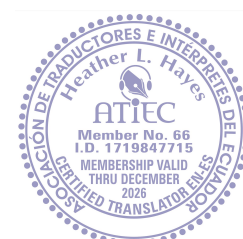
The Biocorredor Amazónico has among its objectives “to support local communities in the Amazon to conserve their territories, improve their well-being, and incorporate social and environmental safeguards.” In this regard, it seeks to ensure that Indigenous Peoples and nationalities, as well as local communities, play an active role in conservation-related decision-making processes that affect their territories and well-being, and that new sustainable development opportunities are aligned with their cultural and environmental values.

This Facilitated Consultation Protocol with a Consent Agreement constitutes an operational instrument of the Environmental and Social Management System (ESMS) of the BCA Fund, aimed at establishing guidelines for the conduct of structured consultation processes in projects or initiatives financed by the BCA Fund, in which Indigenous communities, peoples, or nationalities (hereinafter, IP) voluntarily participate as proponents, potentially affected stakeholders, Executors, or beneficiaries. These processes shall ensure that such participation takes place through free, prior, and informed consultation, expressly stated and supported by valid documentation in accordance with their internal governance mechanisms.

In this regard, this protocol introduces the concept of “Facilitated Consultation with Consent Agreement,” understood as a formal procedure intended to establish guidelines for the implementation of projects or initiatives, through which the IP express their consent to participate in a specific initiative, through a process facilitated by the project proponent or Executor, applicable in the BCA area of influence, for which financing is provided through the Fondo Biocorredor Amazónico.

For the purposes of this protocol, “Facilitated Consultation with a Consent Agreement” refers to the process through which indigenous communities, peoples, or nationalities, under the guidance of a project proponent or Executor, express their agreement, acceptance, or explicit affirmative willingness to participate in an initiative or project to be financed by the BCA Fund. In this process, the project proponent or Executor shall ensure that consent is granted freely and voluntarily, prior to the start of implementation of the project activities, and with the participation of a representative or delegate of the National Environmental Authority (NEA), serving as the guarantor of State oversight.

In this regard, when the initiative or project is submitted by a legal entity, a legal representative, or by indigenous communities, peoples, or nationalities, that is, when the IPs act as proponents or Executors, and their organization or organizations submit, together with the concept note or the full proposal, documentation duly issued through their own governance structures or mechanisms and collective decision-making processes, evidencing their decision to submit the proposal and implement the project or initiative, such documentation shall be considered equivalent to the Facilitated Consultation process with Consent Agreement, and it shall not be necessary to repeat the formal facilitated consultation process.



This protocol identifies how the engagement of indigenous communities, peoples, or nationalities is carried out throughout the phases related to project financing, ensuring that the participation of Indigenous Peoples is conducted under conditions of respect, transparency, equity, and self-determination.

Similarly, this Protocol must be applied in all cases involving activities financed by the BCA Fund that are implemented in indigenous territories or that involve their participation as partners or beneficiaries.

Given that there is currently no specific national regulation that operationally governs Free, Prior and Informed Consultation (CPLI), this Protocol constitutes the official and mandatory implementation mechanism for BCA Fund projects. Its implementation ensures effective respect for collective rights, informed participation, and the obtaining of consent in accordance with applicable constitutional and international standards, with the participation of a representative of the National Environmental Authority as a safeguard guarantor.

In the event that specific national regulations are adopted in the future, the Protocol will be harmonized and adjusted to ensure its consistency with the new legal framework, without affecting the validity or binding nature of the processes previously carried out under this instrument.

2. Definition of next steps related to the design of the proposal

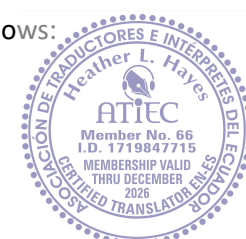
a. Before presenting the concept note:

Prior to the submission of the concept note to the BCA Fund, the actions to be carried out are as follows:

Proposed action	Description
1. Identification and individualization of IP	i) Identify the Indigenous community, people, or nationality that own, or have recognized ownership of, the lands or territories where the project activities are planned to be implemented. ii) Confirm whether the indigenous territory has official or ancestral recognition and whether there are ongoing legal processes related to its tenure.
2. Engagement framework (Executor, partner, beneficiary, or potentially affected stakeholders)	Identify the legitimate representative institution of the IP and determine its role within the project (as Executor, partner, beneficiary, or potentially affected stakeholders) through an explicit expression of its willingness to participate or through an initial dialogue, ensuring respect for the IP's own decision-making and organizational processes.
3. Definition of the area of intervention - influence	Geographically delineate the project's intervention area, specifying coordinates and relating it to the territory recognized as indigenous or ancestral of the IP.
4. Identification of community governance mechanisms	Document the internal governance mechanisms of the IP, including their processes and timelines for decision-making, the predominant native language, and their own mechanisms for resolving disputes.

b. While preparing the project proposal:

The actions to be carried out while preparing the project proposal are as follows:

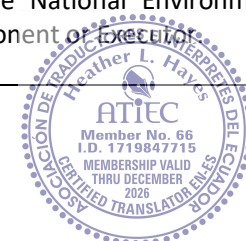


Action	Description
1. Identification of specific aspects to be managed during project implementation	The proposal must be flexible and adapted, taking into consideration inputs from previous briefing meetings and the contributions and suggestions received from the IPs. <i>Note: in the prior meetings, it must be considered and specified whether the aspects discussed relate to cultural, territorial, internal governance, or the participation expectations of the IPs.</i>
2. Definition of mitigation measures and scope	Present to the IPs a preliminary description of potential negative and positive impacts, as well as social and environmental risks that could be associated with implementation of the actions, and the potential mitigation measures identified. Refine the scope of these measures based on the criteria of the IPs involved.
3. Formalization of the participation of IPs: roles, responsibilities, decision-making, and conflict management. Mechanism for formalizing consent.	Document the rights and obligations arising from project implementation, specifying the responsibilities of the IPs, internal decision-making mechanisms, and how potential conflicts or implementation adjustments will be managed. Likewise, if applicable, the mechanism through which the agreement, instrument, mechanism, or consent of the IP will be formalized must be established, ensuring that it is free, prior, and informed and granted collectively in accordance with their cultural and governance practices.

c. During proposal implementation:

The actions to be carried out during the implementation of the project are as follows:

Action	Description
1. Implementation of specific measures	Implement the actions as described and agreed in the approved project proposal, including the risk mitigation measures related to IP described in the ESAP, and implement the actions planned to build or strengthen IP capacities. Among these measures is the application of the Facilitated Consultation process with a Consent Agreement before implementing activities related to IP. Without completing this process, project activities related to IP cannot be implemented. Should the failure to carry out the facilitated consultation process persist, action shall be taken in accordance with the grounds for suspension or termination set out in the corresponding BCA Fund grant agreement.
2. Implementation of the Facilitated Consultation process with a Consent Agreement	Ensure that the facilitated consultation process with a consent agreement is carried out in a free, prior, informed, participatory, and equitable manner. At this stage, Facilitated Consultation with a Consent Agreement processes are mandatory and must be carried out before the start of any Project activity involving Indigenous Peoples (as Executors, partners, beneficiaries, or potentially affected stakeholders) or their territories. This process is formalized and verified through the final decision and the signing of a Consent Agreement Record, signed by the representatives of the IPs, a representative or delegate of the National Environmental Authority (as guarantor), and the project proponent or Executor.



	<p>The decision of the IPs must stem from their own internal deliberative process, in accordance with their governance and decision-making mechanisms.</p> <p>Executors will be required to monitor implementation of the consent agreement and enable IPNs to raise concerns or issues during project implementation.</p>
3. Draft biocultural and community protocols (if previously identified or agreed upon)	<p>In cases where it is identified or agreed upon, draft the corresponding biocultural-community protocol, which addresses issues related to the following:</p> <ul style="list-style-type: none"> - the management of Indigenous Peoples' collective territories, - the intellectual property of the knowledge, innovations, uses, practices, and ancestral knowledge of Indigenous Peoples - if applicable, the conditions for its use, within the framework of the project financed by the BCA Fund. <p>This protocol may be drafted under the leadership of the IPs, with technical support from the Executor, as a tool to ensure the effective protection of their collective rights.</p>

Procedure for implementing the Facilitated Consultation process with a Consent Agreement

a) Parties involved.

For the implementation of the Facilitated Consultation process with a Consent Agreement, the parties that are required to participate are as follows:

- Proponent or Executor (Private Actor): Is responsible for conducting the facilitated consultation process, presenting information in a culturally appropriate manner to the Indigenous Peoples related to the project, and informing and coordinating participation with the National Environmental Authority.
- National Environmental Authority (NEA): It is the institution of the Ecuadorian State that serves as the lead authority on environmental matters. In the framework of this protocol, it will act as a guarantor of rights and will accompany the safeguarded consultation process to verify respect for collective rights and the implementation of this protocol.
- Indigenous communities, peoples, and nationalities (IP): They are the consulted stakeholders, who provide their consent through their highest representative body, in accordance with their own governance and decision-making structures.
- BCA Fund: Responsible for collecting information related to the facilitated consultation process with a consent agreement during the Project appraisal phases (concept note and full proposals), as well as suspending Project activities in cases where the facilitated consultation process with a consent agreement has not been carried out or where supporting documentation is not available.

b) Phases of the process.

The Facilitated Consultation process with a Consent Agreement consists of at least four phases:

Phase	Description
1	Identification of the Indigenous Peoples to be consulted and their characteristics. Invitation and assurance of participation in accordance with their own forms of organization.



2	Provision of information to the IPs, and collection of inputs and suggestions, based on the presentation of the project proposal and activities to be implemented.
3	Discussion and decision-making by the IPs, with a reasonable timeframe determined in accordance with their customs. If consent is not obtained in accordance with their own decision-making mechanisms, the activities cannot be implemented.
4	Formalization of the Consent Agreement, if the decision is affirmative, through minutes, an agreement, a protocol, or the duly and previously agreed mechanism between the project proponent or Executor and the representatives of the consulted IP.

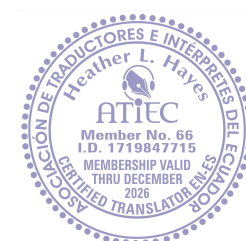
c) Information for the consultation process.

The information to be provided to the IPs during Phase 1 must include at least the following:

Information	Description of what must be reported
Project overview	Presentation of an explanation that ensures full understanding by the IP of the project topic.
Description of actions	Details of the proposed actions and activities, which will be developed and implemented in a participatory manner with the IPs, both in their design and in the implementation of the project itself.
Area of implementation	The specific area where the project activities are proposed to be implemented, and its relationship to the Indigenous Peoples' territories involved.
Project duration	The duration of the implementation of the activities.
Rights and obligations	The rights and obligations arising from the implementation of the activities, for both the IPs and the proponent or Executor.
Costs and financing	Description of the costs for implementing the activities and how they will be financed.
Technical and Financial Feasibility	Efforts should be made to ensure that the community has access to adequate information on the technical and financial feasibility of the activities, in order to clarify their sustainability and impact.
Potential impacts and risks	A preliminary description of possible negative and positive impacts, as well as social and environmental risks that could be associated with the implementation of the activities. Such information must be presented in a clear, facilitated, and culturally appropriate manner for Indigenous Peoples.
Possible benefits	The potential benefits of implementing the activities must be clearly explained, as well as the mechanisms to be developed for the fair and equitable distribution of potential benefits associated with biodiversity that are linked to Indigenous Peoples' ancestral knowledge, practices, and traditional wisdom.
Grievance Redress Mechanism	A clear and simple description of what the mechanism is, its objectives and scope, and how complaints related to the projects can be submitted.

In addition, the institutional information of the proponent or Executor will be shared with the IP, in particular, regarding the following aspects:

- Legal Status: Documented evidence of the legal status of the proponent or Executor.
- Personnel Involved: The list of personnel who will be involved in implementation and their responsibilities. This includes local staff, research institutes, sponsors, consultants, and other stakeholders involved in implementation.
- Contact Information: Executor contact information.



The information mentioned above shall be provided, taking into consideration the specific conditions of the IP, who will serve as interlocutors and rights holders in the process, ensuring at least the following conditions:

- Appropriate means of communication must be identified, as necessary, in the language of the Indigenous Peoples consulted.
- The presentation of the information must take into account cultural appropriateness, level of education, and any other aspect that may influence the effective transmission of the information.
- Preference should be given to culturally appropriate and relevant audiovisual and educational materials that facilitate understanding of the information.
- The consulting party must provide adequate, timely, and complete responses to the questions submitted by the IPs.
- If necessary, a facilitator or translator (who is familiar with or is a member of the consulted IP) may be engaged to help convey the information in a simple manner.
- The timelines for the analysis of information and decision-making shall be determined in accordance with the customs of the consulted IP, respecting their own governance and decision-making mechanisms, and seeking to reach a consensus-based agreement with the proponent or Executor as a prior condition for the commencement of project activities.

d) Agreement documentation

The agreement is formalized through the drafting and signing of a consent record between the proponent–Executor and the representative of the IP(s), with the support of the NEA, as guarantor of respect for and protection of collective rights.

The record must include, at a minimum:

- Project name, objective and expected results, and project area of intervention.
- Role of the IPs in the project.
- Description of the activities to be implemented and, where applicable, the identified and agreed mitigation measures, for the benefit of potentially affected stakeholders.
- Monitoring of the consent agreement during project implementation.
- Description and distribution of monetary and non-monetary resources to be implemented jointly with the IP, either as Executors or beneficiaries.
- Specific provisions on the intellectual property of ancestral knowledge, its respect, safeguarding, and, where applicable, mechanisms for protection.
- Dispute resolution mechanism related to the consent agreement.
- Duration, grounds for termination, and acceptance by the parties.
- Mechanisms for reviewing or adjusting the agreement reached, in the event of significant changes in the project or in the community context.

e) Systematization and documentation of the facilitated consultation process (phase by phase)

The NEA will complete the “Consultation Process Results” checklist. This document will serve as supporting documentation for reporting compliance with the process and will include as annexes the Consent Record, as well as participation registration documents disaggregated by gender (women) and age (youth, adults, older persons) for the informational meetings held during phase 2 and for the discussion and decision-making space conducted during phase 3.

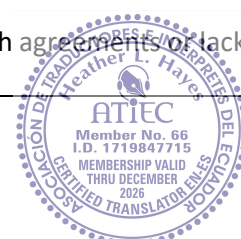
This set of documentation will demonstrate that the consultation process has been carried out in accordance with the principles of inclusion, transparency, equity, and respect for Indigenous Peoples’ own decision-making systems.



3. Content of the informed consent agreement

Below is a **sample consent agreement**. However, other formats and means of documenting consent are also valid. This model is provided for guidance purposes only.

<p>1. General project information</p> <ul style="list-style-type: none"> • Project Name: [Insert full name] • General Objective: [Insert main objective] • Expected Results: [Brief description of the expected results] • Area of Intervention: [Description of the area and territorial location of the IP involved] • Timeframe: [Description of the estimated project implementation duration] • Grant type: [Description of the grant type to which it applies, based on its amount and duration]
<p>2. Parties involved</p> <p>In the community/locality of [Name], on the [Date] day of the month of [Month] of [Year], the following persons appear:</p> <ul style="list-style-type: none"> • On behalf of the Proponent/Executor: [Name of the Representative], acting as the legal representative of [Name of the organization or company] • For Indigenous Peoples (IP): [Name of the Representative], in their capacity as the highest authority of [Name of the community, people, or nationality], in accordance with their own governance mechanisms • State Guarantor: [Name of the Representative/delegate], representing the National Environmental Authority (NEA)
<p>3. Agreements and commitments</p> <p>The Parties freely and voluntarily agree to the following:</p> <ul style="list-style-type: none"> • Express Consent: The IPs express their agreement, acceptance, and affirmative willingness to participate in the initiative funded by the BCA Fund • Description of Actions: Implementation of the following activities is agreed: [Detail jointly designed specific actions and activities] • Roles and Responsibilities: [Define which activities will be carried out by the community and which by the Executor, including monitoring tasks, reporting, technical implementation, among others] • Resource Management: The financial and non-financial resources to be implemented with the IP, either as Executors or beneficiaries, are detailed: [Insert details] • Intellectual Property: Absolute respect for the ancestral knowledge, innovations, and traditional knowledge of Indigenous Peoples is guaranteed. Any use associated with this knowledge will be subject to the corresponding protection and safeguarding mechanisms. Existing biocultural and community protocols, or those developed during the project, will be respected.
<p>4. Dispute Settlement and Duration</p> <ul style="list-style-type: none"> • Conflict Resolution: In the event of disputes related to this agreement, the following mechanisms shall apply: [Insert community's own mechanism or mediation as agreed] • Monitoring of the consent agreement, enabling the IPN to raise concerns and issues during implementation • Duration: This agreement shall remain in force for [Indicate time], counted from the date of its signature. • Grounds for Termination: [Include grounds such as non-compliance with agreements or lack of transparency].



5. Mandatory annexes

For this record to be valid, the following supporting documents compiled by the NEA are attached.

1. Attendance register for the informational meetings (Phase 2).
2. Discussion and decision-making record (Phase 3), with evidence of participation disaggregated by gender (women) and age (youth, older adults).
3. Checklist for the implementation of the Consultation Protocol (Annex 6 of the ESMS), completed by the NEA.

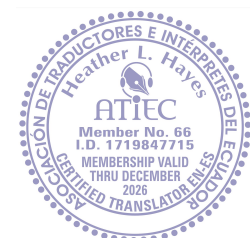
6. Signatures of acceptance

The parties sign in three originals of equal content and legal effect.

(Signature) _____
Executor/Executor Representative

(Signature) _____
Senior Representative of the IP

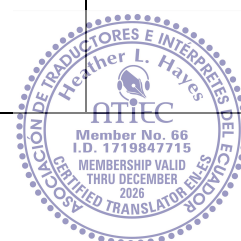
(Signature) _____
Representative of the National Environmental Authority (Guarantor)



Annex 6: Checklist for implementing the Facilitated Consultation Protocol with a Consent Agreement

1. Concept Note Presentation (Safeguards Specialist, BCA Fund)

Criterion	Question	Yes	No	Verification Date	Evidence or Observations
Identification of the subject:	Has the indigenous community, people, or nationality that owns or is legally recognized as the holder of the intervention territory been accurately identified?				
Legitimate representation	Has the legitimate representative institution of the groups involved been identified?				
Participatory role	Was it determined, through an initial dialogue, whether the community will act as a partner or as a beneficiary?				
Other stakeholders present	Are there indigenous peoples/communities that may be affected by the Project without participating as partners or beneficiaries? (e.g., neighboring communities; communities with less formal recognition; communities with shared claims; etc.)				
	What is the nature of the potential risks/impacts to these people/communities?				
Georeferencing	Does the proposed area of intervention include geographic coordinates and a detailed description?				
	Has the map been shared with the Indigenous community, people, or nationality during the consultation?				
Local governance	Were the decision-making processes and timelines, the predominant language, and the mechanisms in place for conflict resolution documented?				



- Identification of the subject: Has the Indigenous community, people, or nationality that owns, or has legal recognition of, the territory of intervention been accurately identified?
- Legitimate representation: Has the legitimate representative institution of the groups involved been identified?
- Participation role: Was it determined through an initial dialogue whether the community will serve as a partner or a beneficiary?
- Other presences: Are there Indigenous Peoples/communities that may be affected by the Project without participating as partners or beneficiaries? (e.g., neighboring communities; communities with less formal recognition; communities with shared claims; etc.) What is the nature of the potential risks/impacts on these persons/communities?
- Georeferencing: Does the proposed intervention area include geographic coordinates and a detailed description? Has the map been shared with the Indigenous community, people, or nationality during the consultation?
- Local governance: Were the decision-making processes and timelines, the predominant language, and the internal mechanisms for conflict resolution documented?

2. Proposal Formulation (Safeguards Specialist, BCA Fund)

Criterion	Question	Yes	No	Verification Date	Evidence
Integration of inputs:	Was the proposal revised to incorporate the inputs and suggestions received from indigenous groups during the information meetings?				
Impact assessment:	Was a description of the potential negative and positive impacts, as well as social and environmental risks, presented to the community?				
Mitigation measures:	Were the mitigation measures validated and confirmed with the criteria of the groups involved?				
	Was the feedback from the IPs on the mitigation measures documented in writing?				
Definition of commitments:	Were the rights, obligations, roles, and specific activities to be assumed by community members clearly documented?				

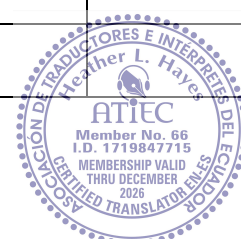


	Does it include benefit-sharing agreements, if any exist?				
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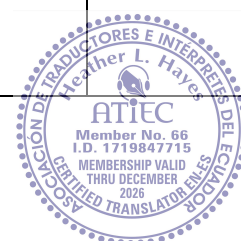
- Incorporation of inputs: Was the proposal revised to incorporate the inputs and recommendations received from Indigenous groups during the information meetings?
- Impact assessment: Was the community provided with a description of the potential negative and positive impacts, as well as the social and environmental risks?
- Mitigation measures: Were the mitigation measures reviewed and validated against the criteria of the groups involved? Was the feedback from the IPs on the mitigation measures documented in writing?
- Definition of commitments: Were the rights, obligations, roles, and specific activities that community members will assume clearly documented? Does it include agreements on benefit-sharing, if any?

3. Facilitated Consultation Process with informed consent agreement (Rep. or delegate of the NEA).

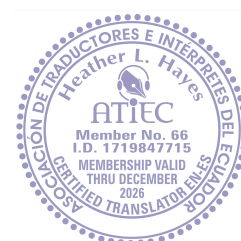
Criteria	Question	Yes	No	Verification Date	Evidence
General understanding:	Does the information provided allow for a full understanding of the project's objective, activities, and duration?				
Sustainability:	Was adequate information provided on technical and financial feasibility to clarify the project's sustainability?				
Institutional transparency:	Was the legal status of the proponent and the list of personnel involved (local staff, researchers, consultants) submitted?				
Cultural relevance:	Were audiovisual and educational materials adapted to the community's language, culture, and level of education used?				
Facilitation:	Was a facilitator or interpreter available to help convey the information in a clear and accessible manner?				
Government support:	Has the participation of a delegate from the National				



	Environmental Authority been coordinated to serve as a guarantor of the process?				
Social Inclusion:	Are there disaggregated participation records that ensure the inclusion of women, youth, and older persons?				
Respect for timeframes:	Were the analysis and decision timelines consistent with the customs of the indigenous community, people, or indigenous nationality respected?				
Consent form:	Is the final agreement obtained in advance, freely given, and informed, and is it formalized through minutes signed by all parties (Executor, IP and NEA)?				
Intellectual property:	Does the record include specific provisions on respecting and safeguarding ancestral knowledge, practices, and traditional know-how? Does it include references to a biocultural protocol, if one exists or has been developed?				
Collective consensus:	Was the consent of the community, people, or nationality obtained in accordance with its own collective decision-making mechanisms (assembly, consensus, or majority, as applicable)? *If not, the activities cannot be implemented.				
Compliance verification:	Has the national environmental authority completed the results checklist on the consultation process to authorize the start of activities?				
	Was the checklist filed as supporting documentation for audit and follow-up?				



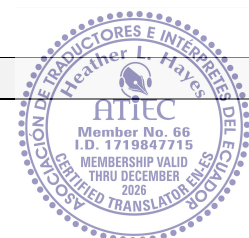
- General understanding: Does the information provided allow for full understanding of the project's objective, activities, and duration?
- Sustainability: Was adequate information provided on technical and financial feasibility to clarify the project's sustainability?
- Institutional transparency: Was the proponent's legal status and the list of personnel involved (local staff, researchers, consultants) submitted?
- Cultural relevance: Were audiovisual and instructional materials adapted to the community's language, culture, and education level used?
- Facilitation: Was a facilitator or interpreter available to help convey the information in a clear and simple manner?
- State accompaniment: Has the participation of a delegate from the National Environmental Authority been coordinated to serve as a guarantor of the process?
- Social inclusion: Are there disaggregated participation records to ensure the participation of women, youth, and older adults?
- Respect for timeframes: Were the timeframes for analysis and decision-making aligned with the customary practices of the indigenous community, people, or nationality?
- Consent record: Is the final agreement free, prior, and informed, and formalized through a record signed by all parties (Executor, IP, and NEA)?
- Intellectual property: Does the record include specific provisions on respecting and safeguarding ancestral knowledge, uses, and know-how? Does it include references to a biocultural protocol, if one exists or has been developed?
- Collective consensus: Was the consent of the community, people, or nationality obtained in accordance with their own collective decision-making mechanisms (assembly, consensus, or majority, as applicable)? If not, can the activities be implemented?
- Compliance verification: Has the national environmental authority completed the results checklist for the consultation process to authorize the start of activities? Was the checklist filed as supporting documentation for audit and monitoring?



Annex 7: Grievance intake form of the Grievance Redress and Response Mechanism (MARR) of the BCA Fund

Complaints Forms

<p>Form to be completed by the complainant <i>This form may be used in digital or paper format.</i> <i>The form may be completed by a focal point when the individual does not complete the form.</i></p>
Name:
Address:
Phone number:
Email address:
Do you wish to keep your identity confidential?
The MARR may accept anonymous complaints provided that they contain sufficient and verifiable information to warrant a review. If the complainant's identity is provided, it will be treated confidentially upon request.
<p>Description of the claim: Clearly describe the complaint, including who was involved, what happened, where it happened, when it happened, and how it affected you.</p>
Date and/or duration of the event/incident that led to the complaint:
Suggestions for resolving the complaint:
Signature:
<p>Consent for follow-up. I authorize the BCA Fund to contact me to follow up on the complaint. Yes No</p>
Date:
BCA Fund internal reference number:



Acknowledgement of receipt of the complaint submitted on (format suggested) [Date]

[Name of the complainant or of the organization if the individual complainant wishes to remain anonymous]

[Contact information]

Subject: Response to your complaint of [date of complaint] regarding [matter of complaint]

[Sir/Madam/To Whom It May Concern]

The BCA Fund deeply values the concerns of its partners and the local communities with whom we work. We appreciate that you have submitted your complaint. We assure you that it will be addressed with the seriousness, confidentiality, and respect it deserves.

We have a grievance redress mechanism (MARR) designed to receive, investigate, and resolve grievances in a fair, timely, and transparent manner. Attached to this communication is a description of the MARR process, detailing the steps to be followed, the estimated timeframes, the responsibilities of the parties, and their rights throughout the process.

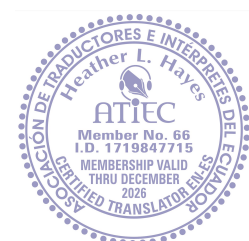
In accordance with our procedures, we will determine whether your claim is admissible and consider any subsequent steps. We will contact you during this period if we require additional information.

You will receive a response from us within 30 business days of the date of this communication.

Sincerely,

Signature

Attached is the BCA Fund procedure for complaint management.



Annex 8: Serious Incident Notification Form

Project Executors shall notify the BCA Fund within a maximum of 24 hours of any serious or moderate incident that occurs during project implementation, especially if it affects environmental, social, or security aspects. This notification is intended to trigger an immediate response and facilitate monitoring and the implementation of corrective measures.

Key incidents that must be reported immediately to the BCA Fund include:

- Any incident related to environmental, health, or occupational health and safety aspects, including (but not limited to) any explosion, spill, or workplace accident that results in fatalities, serious or multiple injuries, or significant environmental contamination.
- Accidents involving members of the public or the local community resulting in fatalities, serious injuries, or multiple injuries.
- Sexual harassment or violence involving project personnel.
- Any social incident, including (but not limited to) any strike or violent labor unrest, or disputes with local communities occurring in or near the works, plants, equipment, or facilities of international organizations, that has or may reasonably be expected to have a substantial adverse impact on the environment, health, safety, or the social and cultural context. In each case, the nature of the incident or accident and its effects within and outside the workplace must be specified.
- Any serious threat to public health and safety, inadequate compensation, disruption of natural ecosystems, discriminatory practices (including the right of indigenous peoples to Facilitated Consultation with Consent Agreement).
- Any report related to infractions or crimes, such as loss of life, sexual violence, or child abuse, that requires the intervention of institutions responsible for protecting citizens' rights, freedoms, and guarantees, such as the National Police and Armed Forces, or other law enforcement authorities.
- Any action by the competent authorities or regulatory bodies that results in the partial or total suspension of the project activities.

General information	
Date and place	
Project title	
Name of the Executor	
Name of the entity providing the information	
Name(s) of the director(s) individual(s)/organization(s)/company(ies)/individual(s) allegedly responsible for causing the incident. The names of the individuals may be anonymous.	
Name(s) or anonymous identity(ies) of the alleged victim(s), their age, sex, and place of residence, and, in cases related to a group or community, as much information as possible	
Incident Details	
Date and time of the incident (approximate, if exact details are not known)	
Location of the incident (approximate, if the exact details are not known)	
Incident type (multiple selections are possible, if applicable)	Occupational health and safety of workers <input type="checkbox"/> Rights of indigenous peoples <input type="checkbox"/>



	Community health and safety <input type="checkbox"/> Gender-based violence <input type="checkbox"/> Social cohesion <input type="checkbox"/> Environmental stability <input type="checkbox"/> Human rights <input type="checkbox"/> Compliance with the law <input type="checkbox"/> Forced evictions <input type="checkbox"/> Social/community risk <input type="checkbox"/>
Detailed chronological description of the incident and its circumstances (attach supporting documentation, such as maps, photos)	
Analysis of the causes	
Detailed description of the factors, including key causal factors such as external failures or potential management failures, and identification of missing/inadequate/failed management and control measures that were not applied (for example, non-compliance with environmental and social measures or standards)	
Specification of the functions and responsibilities related to the incident, including the involvement of the authorities	
Methods used to conduct the root cause analysis (for example, interviews, document reviews, site visits, police reports, etc.).	
Immediate response and corrective measures	
Description of the immediate response and related responsibilities, such as taking the individual(s) to the hospital, notifying the police, engaging national authorities, conducting an investigation, etc.	
Incident closure	
Record the time at which the incident is considered to have been adequately managed. i) estimated closure date ii) actual closure date	



Annex 9. Environmental and Social Review Note

Once the environmental and social assessment and categorization (ESMS tool 2) and ESAP (ESMS tool 3) have been reviewed and validated by the Executive Management of the BCA Fund (through the Environmental and Social Safeguards Specialist), the conclusions and recommendations are transmitted to the Technical Committee in the form of an Environmental and Social Review Note summarizing key information related to environmental and social risks (including the project's overall risk classification, the applicable standards, the main risks and their classification, and measures from the ESAP).

Template for the Environmental and Social Review Note

Project title:
Proponent:
Project reference number:
Type of grant:
Date:
Prepared by:
Reviewed by:

1. Basic project information

Proponent:
Project title:
Type of grant:
Funding request:
Geographic location:
Brief summary of the project activities:

2. Environmental and social risk classification

Overall risk classification: [B+, B, C]

Rationale for the classification:

Summary of the types of activities and the anticipated impacts

Sensitivity analysis of the project area

Considerations regarding the likelihood and severity of the risk

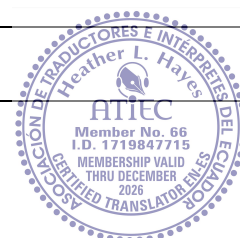
Activated applicable performance standards:

- PS1: Assessment and Management of Environmental and Social Risks and Impacts
- PS2: Labor and Working Conditions
- PS3: Resource Efficiency and Pollution Prevention
- PS4: Community health, safety and security
- PS5: Resettlement and restrictions on access
- PS6: Biodiversity Conservation
- PS7: Indigenous Peoples
- PS8: Cultural Heritage
- Gender (national regulations; see the ESMS tool)

(Include only those that are relevant, with brief justifications for each standard, if possible).

2. Summary of the main environmental and social risks identified

(See the environmental and social assessment in ESMS Tool 2).



4. Stakeholder Participation

Identified stakeholders:

[List the main stakeholder groups: local communities, protected area staff, women's groups, etc.]

Planned or completed participation:

[Summary of participation to date, if applicable]

Recommended actions:

[Preparation of site-specific assessments/plans

Facilitated consultation with informed consent:

[Is it necessary? If so, confirm the stage of the process.]

5. Grievance Redress Mechanism (MARR)

Required MARR level:

[MARR required at the project level: Yes/No (based on the B+ classification and grant size)]

Observations:

[If a MARR exists, or if it is necessary to design or strengthen one]

6. Environmental and Social Action Plan (ESAP)

Status: [Draft / Reviewed / Finalized]

Key commitments:

Key mitigation measures required

Special studies or evaluations (if any)

Stakeholder engagement activities

MARR requirement (Yes/No)

7. Risk mitigation measures and compliance

Integration into the agreement:

Confirmation that the ESAP will be annexed to the grant agreement.

Confirmation that compliance with the ESMS is a condition for disbursement.

Supervision requirements:

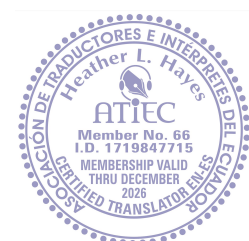
Reporting frequency by the beneficiary

BCA FUND monitoring plans (for example, field visits, spot checks)

8. Recommendation to the Technical Committee

The Executive Management recommends approval of this project subject to the following conditions:

[List any specific conditions or follow-up actions required prior to disbursement].



Annex 10: Risk Management Plan Templates

This annex provides frameworks for the following plans:

- Stakeholder Engagement Plan (SEP)
- Gender Action Plan (GAP)
- Biodiversity Action Plan (BAP)
- Alternative Livelihoods Action Plan (ALAP)

The usefulness of these plans for each project will be determined by the Executor and the Executive Management of the BCA Fund through the Environmental and Social Action Plans (ESAP), as a result of the environmental and social procedure applied.

Stakeholder Engagement Plan (SEP)

Proposed outline:

1. Introduction

- Project overview.
- Purpose of the Stakeholder Engagement Plan (SEP).
- Importance of early, continuous, and inclusive engagement of stakeholders for the environmental, social, and climate sustainability of the project.
- Guiding principles:
 - Inclusion and non-discrimination.
 - Gender and social equity approach.
 - Transparency and access to information.
 - Meaningful and culturally appropriate participation.
 - Facilitated Consultation with a Consent Agreement, when applicable.

2. Legal and policy framework

- Executor policies related to:
 - Stakeholder engagement.
 - Gender equality and women's empowerment.
 - Indigenous Peoples and Local Communities.
- Relevant national legal and institutional framework (public participation, consultation, access to information, collective rights).

3. Stakeholder identification and mapping

- Methodology used to identify actors.
- Categories of actors:
 - Government institutions (national, regional, local).
 - Local communities and natural resource users.
 - Indigenous Peoples (if applicable).
 - Civil society organizations, including women's organizations.
 - Private sector and other relevant stakeholders.
- Stakeholder analysis considering:
 - Interests, roles, and influence.
 - Power relations.
 - Differences in gender, age, ethnicity, and other vulnerability factors.
 - Potential barriers to effective participation.



4. Gender equality and social inclusion approach

- Identification of participation gaps between women and men.
- Specific measures to ensure the effective engagement of:
 - Women (including Indigenous and rural women).
 - Young people, older persons, and other vulnerable groups.
- Strategies to ensure equitable representation, voice, and advocacy capacity in decision-making processes.

5. Engagement strategy

- Specific engagement objectives by stakeholder group.
- Levels of engagement:
 - Information.
 - Consultation.
 - Dialogue.
 - Active participation and decision-making.
- Methods and tools:
 - Participatory workshops and community meetings.
 - Focus groups (including separate gender groups when relevant).
 - Interviews, surveys, and accessible digital mechanisms.
- Adaptation of methods to local cultural and linguistic contexts.

6. Stakeholder engagement plan by project phase

A matrix that includes the following is recommended:

- Project phase (design, implementation, monitoring, evaluation).
- Stakeholder group.
- Engagement method.
- Responsible entities.
- Frequency and timeline.
- Gender and inclusion considerations.

7. Information disclosure

- Types of information to be disclosed (objectives, activities, risks, benefits, results).
- Accessible and culturally appropriate communication channels.
- Measures to ensure that women and vulnerable groups have effective access to information (language, format, schedules, literacy).

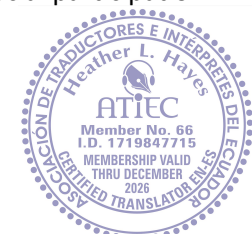
8. Grievance mechanism

- Description of the project's grievance mechanism.
- Principles:
 - Accessibility and confidentiality.
 - Gender-responsive approach and cultural sensitivity.
 - No retaliation.
- Procedures for the receipt, analysis, response, and resolution of grievances.
- Specific measures to ensure safe access for women and vulnerable groups.

9. Institutional arrangements and responsibilities

- Roles and responsibilities for implementing the SAP.
- Coordination among the project team, authorities, and local organizations.
- Required capabilities, including experience in gender equality and social participation.

10. Stakeholder Engagement Plan Budget



- Financial resources allocated to engagement activities.
- Dedicated budget for inclusion measures, gender equality, and the participation of vulnerable groups.

11. Monitoring, evaluation, and reporting

- Engagement indicators, disaggregated by sex and other relevant criteria.
- Monitoring the quality, coverage, and effectiveness of engagement.
- Report in progress reports, midterm reviews, and the final evaluation.

12. Learning and Continuous Improvement

- Mechanisms to incorporate feedback from stakeholders into the project's adaptive management.
- Documentation and dissemination of lessons learned and good practices in inclusive participation.

Gender Action Plan (GAP)

Aligned with the GEF guidance on gender equality²¹ and fully consistent with the standard GCF requirements for financed projects and programs, particularly in environmental and climate contexts.

Proposed outline:

1. Introduction and rationale

- Brief description of the project/program.
- Relevance of gender equality and the empowerment of women to achieving environmental and climate objectives.
- Alignment with international and national gender policies and commitments (e.g., national equality plans, donor gender policies).

2. Regulatory and policy framework

- Applicable gender policies (implementing agency).
- National legislation and policies relevant to gender equality, participation, women's rights, and non-discrimination.

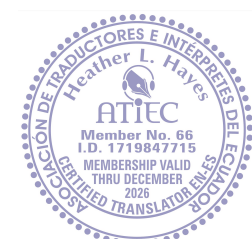
3. Summary of the gender analysis

- Key findings of the gender analysis or equivalent socioeconomic assessment.
- Relevant gender differences in:
 - Access to and control over natural resources.
 - Participation and decision-making.
 - Access to socioeconomic benefits, services, and opportunities.
- Gender-differentiated risks and impacts of the project on women and men.
- Opportunities to close gender gaps and strengthen women's empowerment.

4. Objectives of the Gender Action Plan

- Overall objective of the GAP.
- Specific objectives, aligned with:
 - Reduction of gender inequalities.
 - Effective participation and leadership of women.
 - Equitable distribution of project benefits.

²¹<https://www.thegef.org/sites/default/files/publications/GEF%20Guidance%20on%20Gender.pdf>



5. Gender-related actions and measures

For each action, it is recommended that a table be presented including: activity, gap/risk addressed, target group, responsible party, timeline, budget.

Examples of areas of action:

- Equitable access to resources, information, and capacity-building.
- Meaningful participation of women in planning, governance, and decision-making processes.
- Strengthening women's technical, organizational, and leadership capacities.
- Measures to reduce unpaid work burdens and structural barriers.
- Prevention of adverse impacts and social risks with a gender perspective.

6. Gender-responsive results framework and indicators

- Indicators disaggregated by sex (and, where possible, by age, ethnicity, or other relevant criteria).
- Gender-sensitive indicators to measure changes in:
 - Access to and control over resources.
 - Participation and leadership.
 - Economic and social benefits.
- Quantitative and qualitative targets.

7. Institutional arrangements and capacities

- Roles and responsibilities for implementing the GAP.
- Appointment of gender focal points or gender specialists.
- Capacity-building needs of the team and partners.

8. GAP Budget

- Financial resources specifically allocated to gender-related actions.
- Integration of the GAP budget into the project's overall budget.

9. Monitoring, evaluation and reporting

- Mechanisms for the periodic monitoring of gender-related actions and indicators.
- Progress report on implementation reports, midterm reviews, and the final evaluation.
- Use of results for learning and adaptive management adjustments.

10. Communication and knowledge management

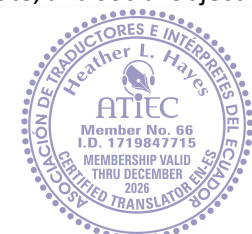
- Gender-sensitive communication strategies.
- Dissemination of good practices, lessons learned, and results on gender equality.
- Engagement of women's organizations and key actors in outreach.

Biodiversity Action Plan (BAP)

Proposed outline:

1. Introduction

- Project/program overview.
- Objective of the Biodiversity Action Plan (BAP).
- Relationship between the BAP and the project's environmental, climate, and social objectives.
- Applied approach:
 - Mitigation hierarchy (avoid, minimize, restore, offset).



- Principle of “no net loss” or “net gain” of biodiversity, as applicable.

2. Regulatory and policy framework

- Relevant policies and safeguards
- Applicable international conventions:
 - Convention on Biological Diversity (CBD).
 - CITES, Ramsar, CMS (as applicable).
- National legal and institutional framework on biodiversity, protected areas, and the use of natural resources.

3. Ecological context and biodiversity baseline data

- Description of the area of intervention:
 - Ecosystems present.
 - Critical habitats, natural or modified.
- Key species:
 - Endemic, threatened, or protected species.
 - Species of ecological, cultural, or economic significance.
- Relevant ecosystem services.
- Non-material or cultural benefits for Indigenous Peoples (for example: sacred sites).
- Methodology used for the baseline (studies, literature, participatory monitoring).

4. Identification of impacts and risks to biodiversity

- Potential direct, indirect, and cumulative impacts of the project.
- Risks associated with:
 - Loss or degradation of habitats.
 - Ecological fragmentation.
 - Pressure on species and natural resources.
- Analysis of differentiated impacts by project phase (design, implementation, operation).

5. Biodiversity Action Plan objectives

- Overall objective of the BAP.
- Specific objectives, for example:
 - Avoid or minimize adverse impacts on ecosystems and species.
 - Restore degraded ecosystems.
 - Enhance ecological connectivity.
 - Strengthen sustainable biodiversity management at the local level.

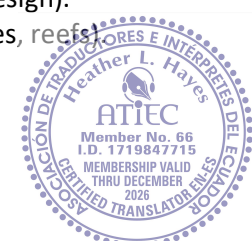
6. Management measures and biodiversity actions

An action matrix is recommended, including:

- Identified impact/risk.
- Management measure (avoidance, mitigation, restoration, compensation).
- Description of the action.
- Officer in charge.
- Timeline.
- Estimated budget.

Examples of actions:

- Avoidance measures (relocation of activities, ecosystem-sensitive design).
- Ecological restoration (reforestation, wetland restoration, mangroves, reefs).
- Sustainable management of natural resources.



- Conservation of priority species.
- Measures to prevent invasive species.

7. Biodiversity and local communities approach

- Role of local communities and indigenous peoples in the management of biodiversity.
- Integration of traditional and local knowledge.
- Measures to ensure shared benefits and prevent adverse impacts on livelihoods.
- Coordination with the Stakeholder Engagement Plan (SAP) and the GAP, as applicable.

8. Biodiversity indicators and monitoring framework

- Key ecological indicators (habitat, species, cover, connectivity).
- Outcome indicators (improved conservation status, reduced pressures).
- Monitoring methods:
 - Scientific monitoring.
 - Community-based/participatory monitoring.
- Frequency and monitoring responsibilities.

9. Institutional arrangements and capacities

- Roles and responsibilities for implementing the BAP.
- Coordination with environmental authorities and protected area managers.
- Technical capacity-building needs.

10. Budget of the Biodiversity Action Plan

- Costs associated with:
 - Implementation of management measures.
 - Restoration and conservation.
 - Monitoring and evaluation.
- Integration of the BAP budget into the project's overall budget.

11. Monitoring, evaluation and reporting

- Mechanisms to monitor compliance with the BAP.
- Progress report provided in project's periodic reports.
- Mid-term and end-of-project results evaluation.
- Adaptive management based on monitoring findings.

12. Knowledge Management and Sustainability

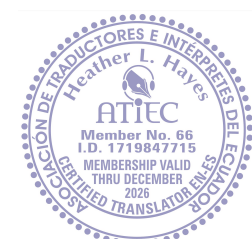
- Documentation of best practices and lessons learned.
- Dissemination and scalability strategies.
- Measures to ensure the sustainability of post-project biodiversity results.

Alternative Livelihoods Action Plan

Proposed outline:

1. Introduction

- Project overview
- Objective of the Alternative Livelihoods Action Plan (ALAP)
- Justification of the ALAP:
 - Reduced pressure on natural resources.



- Compensation or replacement of activities that cause environmental or social impacts.
- Sustainable improvement and diversification of livelihoods.
- Guiding Principles:
 - “Do no harm” and the progressive improvement of livelihoods.
 - Social inclusion and gender equality.
 - Climate resilience and environmental sustainability.

2. Regulatory and policy framework

- Applicable policies and safeguards
- Relevant national legal and institutional framework:
 - Local economic development.
 - Access to productive resources and decent work.
 - Rural, fisheries, forestry, or urban economy (depending on context).

3. Socioeconomic Context and Livelihood Baseline

- Profiling of households and target groups.
- Current livelihood activities that:
 - Have negative impacts on biodiversity/ecosystems, or
 - They are vulnerable to climate change or to project constraints.
- Gender differences in:
 - Access to productive assets and resources.
 - Productive and reproductive roles.
 - Access to markets, finance, and training.
- Key vulnerabilities (environmental, climate, economic, and social).

4. Identification of impacts and risks to livelihoods

- Project impacts that may:
 - Restrict access to natural resources.
 - Reduce income or food security.
- Risks of exclusion, elite capture, or increased inequalities.
- Groups most at risk (women, youth, indigenous peoples, poor households).

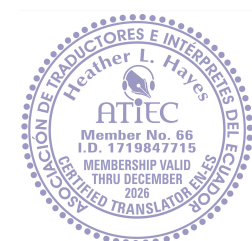
5. ALAP objectives

- Overall objective of the ALAP.
- Specific objectives, for example:
 - Replace unsustainable activities with feasible alternatives.
 - Diversify climate-resilient sources of income.
 - Increase income in a sustainable and equitable manner.
 - Reduce direct dependence on climate-sensitive natural resources.

6. Alternative livelihood actions and measures

An action matrix is recommended, including:

- Activity/impact to be replaced.
- Target group (disaggregated by sex, age, and ethnicity).
- Proposed alternative activity.
- Description of the intervention.
- Responsible entities.
- Timeline.
- Estimated budget.



Examples of alternative activities:

- Agroecology, agroforestry, and sustainable production.
- Sustainable small-scale fisheries and value added.
- Community-based tourism and ecotourism.
- Local processing of non-wood forest products.
- Green enterprises and the circular economy.

7. Gender and social inclusion approach

- Specific measures for:
 - Ensure the meaningful participation of women and young people.
 - Ensure equitable access to training, assets, and income.
- Actions to reduce structural barriers:
 - Time, mobility, social norms, access to care.
- Direct coordination with the GAP and the SAP.

8. Indicators and monitoring for alternative livelihoods

- Indicators disaggregated by sex and other relevant criteria.
- Monitoring methods (surveys, participatory monitoring, financial records).

9. Institutional arrangements and capacities

- Roles and responsibilities for the implementation of the ALAP.
- Coordination with:
 - Local institutions.
 - Community-based organizations.
 - Private sector and markets.
- Needs for strengthening technical and business capacities.

10. ALAP Budget

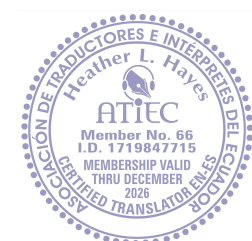
- Financial resources allocated to ALAP actions.
- Resources for technical assistance and post-implementation support
- Mainstreaming the budget into the overall project budget.

11. Grievance mechanism

- Coordination with the project grievance mechanism.
- Specific measures to ensure safe and confidential access, particularly for women and vulnerable groups.

12. Monitoring, evaluation and reporting

- Regular monitoring of ALAP performance.
- Reporting in progress reports, mid-term reviews, and the final evaluation.
- Results-based adaptive management and beneficiary feedback.



Annex 11: Environmental and Social Code of Practice (ESCOP)

This Environmental and Social Code of Practice (ESCOP) represents good environmental, social, community safety, and occupational health and safety (OHS) practices designed to minimize the typical adverse impacts associated with small-scale civil works financed by the Fondo del Biocorredor Amazónico (BCA Fund).

The BCA Fund operates exclusively in the Ecuadorian Amazon Biocorridor, one of the most biodiverse and culturally significant regions in the world. Construction activities financed through BCA Fund grants are typically small-scale (ranger stations, community halls, nurseries, research facilities, ecotourism infrastructure, small bridges, water and sanitation systems, building renovations), but are frequently carried out in or adjacent to ecologically sensitive habitats, protected areas, and Indigenous territories. This requires a high level of environmental and social due diligence by all contractors.

This ESCOP is a living document. It is intended as a template that must be reviewed and supplemented with additional site-specific measures before each implementation, based on the actual conditions and risks of the construction project. The ESCOP must form part of the contractual agreement between the Executor of the BCA Fund project and the construction contractor.

General requirements

The following general requirements apply to all construction projects financed by the BCA Fund. They are non-negotiable and apply regardless of the project's size, location, or type of works:

- The works will be carried out using tools and machinery appropriate to the scale of the intervention. Large-scale earthmoving machinery (excavators, bulldozers) is not permitted unless expressly approved in the Environmental and Social Action Plan (ESAP).
- No land acquisition, economic displacement, or physical displacement of any person or community will occur as a result of construction activities financed by the BCA Fund. Any temporary use of land required for construction must be based on a written agreement with the landowner, entered into voluntarily, on the basis of prior informed consent and free will, including the agreed compensation, conditions of use, and restoration requirements.
- Compensation at full replacement cost shall be paid in a timely manner by the contractor for any damage to land, structures, crops, trees, or other assets belonging to community members or landowners as a result of construction activities.
- No construction activity may begin in indigenous territories without confirmation from the project Executor that the Facilitated Consultation with Consent Agreement process (Annex 5 of the BCA Fund ESMS) has been completed and that a signed Consent Agreement is in place.
- All required environmental, construction, and water permits and authorizations must be obtained from Ecuadorian national and local authorities before works begin. Copies must be kept on site.
- The ESCOP will be supplemented by the obligations arising from relevant Ecuadorian legislation, as applicable to each project.
- Implementation of the ESCOP will be supervised throughout the entire construction period by the project Executor and the E&S Safeguards Specialist of the BCA Fund.

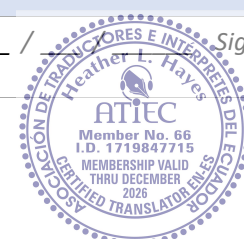
Section 1: Project Registration Form

This form must be completed by the project Executor and the contractor before construction works begin. It establishes the specific project context for the application of this ESCOP. A completed copy



must be kept on site throughout the construction works and submitted to the E&S Safeguards Specialist of the BCA Fund.

Project Identification	
Project/grant name:	
Project site location:	Town/community, canton, province, region
Grant (NGO/organization):	Organization receiving the grant from the BCA Fund
Executor:	
Construction contractor:	Name of the construction company or contracted Executor
E&S Safeguards Specialist, BCA Fund:	Name, contact number / email address
Project description and characteristics	
Type of infrastructure:	Describe the infrastructure to be built, rehabilitated, or adapted (e.g., ranger station, community hall, nursery, potable water system, walkway, latrines, ecotourism lookout, building rehabilitation). Include exact GPS coordinates or a location map, if available.
Project activities:	Describe the construction activities to be undertaken (e.g., site clearing, earthworks, concrete works, carpentry, roofing, drainage installation, painting, landscaping) and the construction phases (preparation, construction, operation, dismantling).
Machinery and equipment:	List all machinery, equipment, and vehicles to be used on site. Indicate whether any heavy machinery requires specific approval from PEASA.
Environmentally sensitive features near the site:	Identify rivers, streams, wetlands, protected areas, critical habitats, or wildlife corridors within 500 m of the construction site.
Indigenous territories and Indigenous communities:	Identify any commune, community, Indigenous people, or Indigenous nationality whose territories overlap with or are adjacent to the project site. Confirm whether the Consent Agreement has been obtained.
Key risks and authorizations	
Key E&S risks identified (see Section 2 for guidance):	List the key environmental and social risks generated by the specific activities under this project. Use Section 2 (Table of Risks and Measures by Activity) to identify the relevant risks and required mitigation measures, and confirm which ones apply to this project.
Permit requirements:	List all permits, licenses, and authorizations required prior to the start of the works. Indicate the status (Granted / Pending / Not Required) and any pending actions. Permit / Document Status Pending actions Environmental registration / license Water use and discharge permit Construction permit (municipal) Waste management permit Forestry permit (if vegetation is felled)
Construction phase:	<input type="checkbox"/> Planning <input type="checkbox"/> Construction <input type="checkbox"/> Operation <input type="checkbox"/> Closure
Approximate construction duration:	Start date: ___ / ___ / _____ Expected completion: ___ / ___ / _____
Number of workers on site (peak):	Direct workers: _____ Contracted/subcontracted workers: _____
Signature and approval	
Completed by (Executor):	Name: _____ Date: ___ / _____ Signature: _____

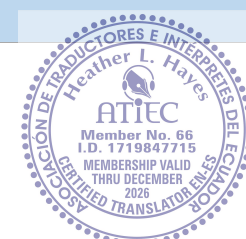


Reviewed and approved by (Environmental and Social Safeguards Specialist E&S of the BCA Fund):	Name: _____ Date: ___ / ___ / _____ Signature: _____
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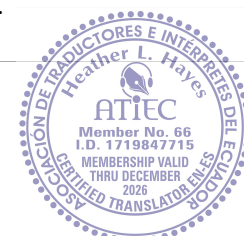
Section 2: Risk and mitigation measures table by activity

The table below provides examples of the main environmental, social, and occupational health and safety (OHS) risks associated with typical construction and rehabilitation activities under projects financed by the BCA Fund in the Biocorredor Amazónico, together with the required mitigation measures. The Executor and the contractor must review this table prior to the start of works and confirm which activities and risks are relevant to the specific project. When an activity or risk applies, the corresponding measures become project-specific requirements of the ESMP for that project. Additional site-specific measures may be added as needed.

Activity / Type of project work	Key risks	Required measures
All activities		
All construction activities	<i>Use of child or forced labor</i>	<ul style="list-style-type: none"> • Verify the age and identity of all workers prior to hiring them. Do not employ any person under 18 years of age in any capacity. Do not employ any person under 18 years of age in hazardous activities under any circumstances. • Provide all workers with written contracts specifying their role, remuneration, working hours, and rights before they begin work. • Do not require workers to surrender identity documents or pay recruitment fees as a condition of employment (indicators of forced labor). • Post the MARR contact information for the BCA Fund and the IGM contact for workers in all working languages at the site entrance.
	<i>Discrimination and unequal treatment</i>	<ul style="list-style-type: none"> • Implement a fair and transparent recruitment process. Do not discriminate on the basis of gender, age, ethnicity, disability, religion, nationality, marital status, pregnancy, or any other characteristic. • Pay all workers wages equal to or above the applicable Ecuadorian legal minimum wage for the sector, on time and in full. • Ensure equal access to employment opportunities for women and members of the local community, where skills permit.
	<i>Community disruption and community conflict</i>	<ul style="list-style-type: none"> • Hold a community information meeting before the start of the works to explain the scope, duration, work schedule, and possible disruptions. Record attendance. • Designate a Community Liaison Officer (CLO) appointed prior to mobilization. Post the CLO contact details at the site entrance and at the community meeting point. • Establish and communicate a community grievance submission point. Acknowledge receipt of grievances within 5 business days; respond within 15 business days. • Inform all MARR communities of the BCA Fund: atencion.marr@fondobca.org
Site preparation and earthmoving works		

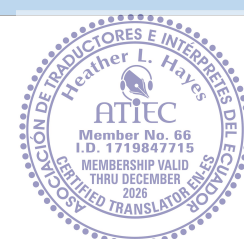


Site clearance and vegetation removal	<i>Unauthorized clearing beyond the approved footprint; loss of sensitive vegetation</i>	<ul style="list-style-type: none"> • Demarcate the entire construction footprint with physical markers (tape, stakes, fencing) prior to any site clearing. • Clearly demarcate all exclusion zones (vegetation strips, watercourse setbacks, culturally sensitive areas). No works are permitted in exclusion zones. • Obtain written approval before beginning any land clearing. • Do not remove vegetation using machinery in areas designated as exclusion zones. • Document all mature trees felled (species, diameter); obtain written approval and the required national permit for each tree felled.
	<i>Introduction of invasive species through equipment and materials</i>	<ul style="list-style-type: none"> • Inspect all equipment and vehicles arriving from other locations for soil, seeds, and plant material. Clean before entering the site. • Use only locally native species in restoration and landscaping. Confirm supply from verified suppliers.
Excavation and trenching	<i>Trench or excavation collapse resulting in worker injuries</i>	<ul style="list-style-type: none"> • Shore or bench all trenches and excavations more than 120 cm (4 ft) deep before a worker enters. Use timber shoring installed progressively, or cut embankment slopes to 1:1 (45 degrees). • Underground utilities (water, gas, electricity, sewerage) must be located and marked before excavation begins. • Keep excavated soil and equipment at least 1 meter from the edge of all trenches and pits. • Ladder access must be provided for all trenches deeper than 120 cm. Workers must not jump in or out. • A second worker must be working in the field in the vicinity of any occupied trench at all times. • Inspect trenches after rainfall or vibration events before allowing re-entry.
	<i>Contamination of wells or drinking water sources</i>	<ul style="list-style-type: none"> • Site wells, latrines, and septic systems at least 30 meters away from any potential source of contamination. Confirm this with a qualified technician.
Topsoil erosion and	<i>Soil erosion and sedimentation in Amazonian watercourses</i>	<ul style="list-style-type: none"> • Remove and stockpile the topsoil separately from the subsoil. Stockpiles must not exceed 1.5 m in height. Protect with temporary seeding or cover during the rainy season. • Install silt fences or sediment barriers at the downslope boundary of all disturbed areas before the start of earthmoving activities. • Revegetate or stabilize all exposed soil surfaces as soon as the works in each area are complete. • Maintain a 30-meter buffer zone along all permanent and seasonal watercourses. No earthworks, storage, or waste disposal within the buffer zone without approval.
Minor civil works (structures and rehabilitation)		
Construction of small buildings (park ranger posts, community halls, health posts, nurseries)	<i>Collapse of unstable walls or roofs during rehabilitation</i>	<ul style="list-style-type: none"> • Assess the structural stability of all existing walls and roofs before any rehabilitation work begins. Carry out stabilization works before construction teams enter. • Shore or temporarily brace any unstable structural element before working adjacent to it.



	<i>Falls from heights during roofing, painting, or installation work</i>	<ul style="list-style-type: none"> • Use scaffolding specifically designed for this purpose or secured ladders for all work above the level of the floor below. Inspect ladders before each use. Do not use damaged ladders. • Do not use metal ladders near overhead power lines. • Enforce the use of safety harnesses when working on roofs or at unprotected edges above 2 m. • Do not work at height alone; a second person must be present.
	<i>Community security — open site near settlement</i>	<ul style="list-style-type: none"> • Establish a safe site perimeter (fencing, barriers) appropriate to the site's proximity to residential areas, schools, and community spaces. • Cover and secure all excavations, holes, and open openings with covers or fixed, clearly marked fencing at the end of each workday. • Do not leave any sharp or dangerous objects (nails, broken glass, tools, wire) accessible to children or members of the community. • Install warning signs and lighting at the site entrances and along the site boundary where it is adjacent to pedestrian areas.
Trails, small bridges, and stream crossings	<i>Disturbance of riparian habitat and sedimentation of watercourses during bridge construction/crossings</i>	<ul style="list-style-type: none"> • Install all temporary stream crossings using properly designed culverts or bridges that do not obstruct fish passage or significantly alter water flow. • Minimize the duration of in-stream works. Implement a temporary cofferdam or stream diversion where works must be carried out in the watercourse. • Remove all temporary crossing structures and restore the riverbanks to their natural profile once the works are completed.
	<i>Traffic accidents on access roads open to public traffic</i>	<ul style="list-style-type: none"> • Protect work zones in or adjacent to traffic with warning signs, barriers, and flaggers. • Apply a maximum speed limit of 20 km/h for all project vehicles on unpaved tracks in or near communities. • All workers on or near traffic routes must wear high-visibility safety vests. • Avoid vehicular traffic during the hours when children travel to and from school.
Work with small electrical equipment and generators	<i>Electrocution from tools, equipment, or generators</i>	<ul style="list-style-type: none"> • All tools and electrical appliances must be double-insulated or have a three-prong plug. • Only qualified electricians are authorized to service or repair electrical appliances, tools, and generators. • Ensure that all electrical work is performed on a dry surface. Disconnect power tools from their power source before making adjustments. • Tag all tools with damaged cords, casings, or grounding plugs as 'Out of Service' and remove them from the site until they are repaired. • Provide residual current devices (RCD/safety switches) on all temporary electrical supply circuits on site.

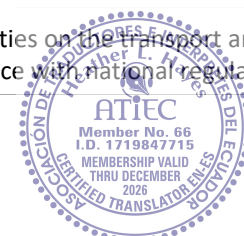
Water supply, sanitation, and drainage works



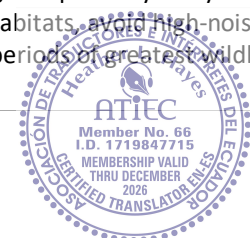
Hand-dug wells, latrines, and septic systems	<i>Well collapse; worker trapped</i>	<ul style="list-style-type: none"> All safety measures for excavation and trenches (see above) apply to well construction. Stabilize the well walls progressively as the excavation advances. Do not over-excavate before installing the lining. Two workers must always be present, one inside the well and the other above ground.
	<i>Groundwater and drinking water pollution</i>	<ul style="list-style-type: none"> Site latrines and septic systems at least 30 m from all wells, springs, and watercourses. Properly line latrines to prevent seepage into groundwater where soil conditions require it. Test the water quality of the new wells before placing them into service for community use.
Installation of rainwater harvesting systems and minor drainage works	<i>Waterlogging, flooding, and mosquito proliferation due to inadequate drainage</i>	<ul style="list-style-type: none"> Design the drainage to prevent water from stagnating. Slope all drainage channels toward appropriate outlets. Clear debris from drainage structures at the end of each workday. Do not leave standing water in work areas. Avoid creating conditions conducive to mosquito breeding, particularly in worker accommodation areas.
All construction sites in the Biocorredor		
All sites in or adjacent to natural habitats	<i>Disturbance of wildlife, including nesting or breeding species</i>	<ul style="list-style-type: none"> Inform all workers about the protocols for encounters with venomous snakes, spiders, scorpions, stinging insects, caimans, and other potentially dangerous wildlife before beginning work. Cease work in the vicinity if nesting birds, large mammals, or other sensitive wildlife are observed. Report to the Site E&S Officer. Prohibit all hunting, trapping, fishing, and collection of wildlife or plants by construction workers at or around the site. Any worker who does so must be removed from the project immediately.
	<i>Introduction of invasive species and pathogens from off-site construction areas</i>	<ul style="list-style-type: none"> Inspect all vehicles, machinery, materials (sand, gravel, soil, planting material) and equipment originating outside the Biocorredor for seeds, soil, and plant fragments before entry to the site. Clean footwear and equipment before entering ecologically sensitive areas.
Sites in or adjacent to Indigenous Peoples' territories	<i>Construction without CPLI — violation of collective rights</i>	<ul style="list-style-type: none"> Request and retain a copy of the signed Consent Agreement (Annex 5 of the BCA Fund ESMS) from the project Executor before mobilizing workers to sites located in, or that may affect, indigenous territories. Inform all workers about the governance, cultural protocols, and territorial norms of the relevant community prior to entry. Comply with all community-specific access protocols (e.g., obtain authorization from community authorities, respect restricted areas, follow protocols for greeting community leaders). Ensure that a Community Liaison Officer is present on site or accessible during all field days in or near indigenous territories.
	<i>Cultural harm, photography,</i>	<ul style="list-style-type: none"> Do not photograph, record, or otherwise document community members, households, ceremonies, sacred



	<i>traditional knowledge, sacred sites</i>	<p>sites, or cultural practices without explicit individual or collective consent.</p> <ul style="list-style-type: none"> Do not document, use, or disclose Indigenous traditional knowledge without the community's prior consent. If, during excavation, any object, structure, or site of potential cultural or archaeological significance is discovered, immediately stop all work in the area and follow the Chance Find Procedure (see Section 4 below).
	<i>Social risks: worker–community interaction in Indigenous territories</i>	<ul style="list-style-type: none"> Enforce the Worker Code of Conduct with zero tolerance. Any SEAH by a worker will result in immediate removal and referral to the BCA Fund and national authorities. Do not allow workers to consume alcohol or illicit substances during working hours or within the community. Avoid bringing large numbers of external workers into small, remote Indigenous communities. Prioritize local community employment where skills allow.
Remote and isolated construction sites	<i>Medical emergency with no nearby facility</i>	<ul style="list-style-type: none"> Identify the nearest health facility and establish a written medical emergency and evacuation procedure before the start of works. Communicate this procedure to all workers. Provide one trained first-aider per 25 workers and adequate first aid kits at all sites. Maintain functional communications equipment (satellite telephone or radio) at all remote sites. Establish a daily check-in program. Never allow workers to work alone in remote locations.
	<i>Vector-borne and waterborne diseases</i>	<ul style="list-style-type: none"> Provide insect repellent and mosquito nets in rest areas. Confirm that workers are vaccinated against tetanus and relevant Amazonian diseases prior to deployment. Provide clean, safe drinking water to all workers at all times. Install adequate sanitation facilities (minimum one latrine per 15 workers, at least 50 m from watercourses). Monitor symptoms of illness and seek immediate medical attention if workers show signs of illness.
	<i>Safety in river and water travel</i>	<ul style="list-style-type: none"> All occupants of boats must wear life jackets at all times while on the water. Boats must not be overloaded. Minimize nighttime travel on rivers. When unavoidable, use appropriate navigation lights. The vessels used to transport the project must receive regular maintenance and be operated by a qualified boat operator.
Waste, chemicals, and fires		
General construction and demolition waste	<i>Improper waste disposal — refuse, open burning, illegal dumping</i>	<ul style="list-style-type: none"> Install on-site segregated, labeled, waterproof waste containers for: non-recyclable general waste; recyclables (plastic, metal, glass, paper); organic/food waste; and hazardous waste. Regularly remove all waste from the site for disposal at an authorized facility. Do not leave waste on site overnight in open containers. Maximize the reuse of excavated soil for backfill, landscaping, and other project areas before disposing of it off-site. Coordinate with local authorities on the transport and disposal of waste in accordance with national regulations.



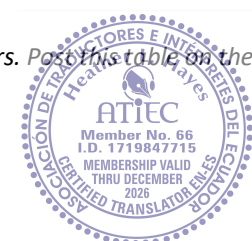
		<ul style="list-style-type: none"> Do not leave any sharp or dangerous objects accessible to children or wildlife near the site.
Hazardous materials — fuels, chemicals, paints, solvents, asbestos	<i>Spill or leak that contaminates Amazonian waterways or soil</i>	<ul style="list-style-type: none"> Store all fuels, lubricants, paints, solvents, and chemicals in sealed, labeled containers on a waterproofed base with secondary containment (berm). Restrict access using a lockable door. Use drip trays during all refueling and machinery maintenance operations. Maintain a hazardous materials register that lists all chemicals on site, quantities, and disposal records. Equip fuel storage and refueling areas with spill response kits. Ensure that workers know how to use them. In the event of a spill: stop the source, contain it using materials from the response kit, prevent runoff into drains or watercourses, and immediately notify the Site E&S Officer. Any spill that reaches a watercourse must be reported to the BCA Fund within 24 hours.
	<i>Asbestos or other legacy hazardous materials in renovation works</i>	<ul style="list-style-type: none"> Inspect all existing buildings for asbestos-containing materials (ACM), lead-based paint, and other legacy hazardous materials prior to the start of any renovation, demolition, or disturbance activities. If ACM are confirmed or suspected, hire a licensed specialist subcontractor to safely remove and dispose of them before construction crews enter the affected area. Do not disturb suspected ACM without specialized assessment. Workers who may be exposed must use appropriate respiratory protection.
Fire prevention and fire control	<i>Accidental fire at or near the construction site — risk of an Amazon wildfire</i>	<ul style="list-style-type: none"> Prohibit all open burning of vegetation clearing debris, construction waste, or any other material on the site or in its surroundings. This prohibition is absolute — the Amazonian context makes open burning particularly dangerous. Do not discard cigarette butts on the ground. Designate a smoking area away from flammable materials. Provide appropriate firefighting equipment on site (at a minimum, a fire extinguisher; rubber flappers in scrub/grassland areas). Train all workers on fire risks and response. Store all flammable materials (fuels, solvents, wood) under conditions that limit the potential for ignition and the spread of fire. Report any fire (including small fires that are quickly brought under control) to the Site E&S Officer and the project Executor immediately.
Noise, dust, and traffic		
Noisy construction activities and haul routes	<i>Noise disturbance to communities, schools, health facilities, and wildlife</i>	<ul style="list-style-type: none"> Limit noisy activities (compaction, concrete breaking, generators, heavy vehicle movements) to daytime hours. No noisy activities on Sundays or public holidays without the community's prior consent. Provide at least 48 hours' advance notice to affected communities before initiating exceptionally noisy activities. In areas adjacent to natural habitats, avoid high-noise activities at dawn and dusk (periods of greatest wildlife activity) where feasible.



		<ul style="list-style-type: none"> Maintain generators and compressors in good working order and equip them with appropriate mufflers. Turn off vehicle engines when not in use.
Dust generation from earthworks, unpaved roads, and material stockpiles	<i>Respiratory hazard for workers and the community; dust-related damage to vegetation</i>	<ul style="list-style-type: none"> Apply water suppression on the site's unpaved roads, material stockpiles, and demolition areas during dry periods. The frequency shall be sufficient to prevent visible dust plumes from reaching adjacent properties or habitats. Cover all stockpiles of dusty materials (sand, gravel, cement, rubble) with tarps when they are not in active use. All vehicles transporting loose materials must be covered with tarpaulins. Maximum speed of 20 km/h on unpaved site roads. Provide dust masks to workers handling dry cement or powdered materials, or working in dusty conditions. Do not remove vegetation unless it is necessary for the works.
Vehicle and equipment movement near communities	<i>Road traffic accidents: workers, community members and children at risk</i>	<ul style="list-style-type: none"> Implement speed limits: a maximum of 20 km/h on unpaved tracks in or near communities; a maximum of 30 km/h on paved roads adjacent to communities. Equip all vehicles with functional reverse alarms. Ensure that truck drivers are accompanied by a flagger when reversing, loading, or unloading near community areas. Avoid vehicle routes frequently used by community members and children, particularly during school hours. Train all drivers on the project's safety requirements before authorizing them to drive on site. Do not use a mobile phone while driving. Do not drive under the influence of alcohol or any substance. Maintain access roads in good condition and free of stockpiles, waste, and construction materials.
Site closure and restoration		
Completion of construction works: all projects	<i>Abandonment of the site in a degraded or unsafe condition</i>	<ul style="list-style-type: none"> Remove all construction debris, surplus materials, temporary structures, equipment, and facilities from the site prior to handover. Do not leave any materials abandoned. Remove all temporary erosion controls once site surfaces have been stabilized, unless they form part of the permanent drainage system. Restore all temporarily disturbed areas (access roads, stockpile areas, worker facilities) to a stable, vegetated condition using only locally native species. Fill all excavations and restore ground levels to the natural profile, except where the approved design requires otherwise. Dismantle and decontaminate all fuel and chemical storage areas, including remediation of any contaminated soil. Conduct a final site inspection with the project Executor and, where appropriate, community representatives, to confirm that restoration is satisfactory prior to final payment.

Section 3: Do's and Don'ts

This section provides a quick reference summary for field supervisors and site workers. Post this table on the site notice board and review it during daily safety briefings.



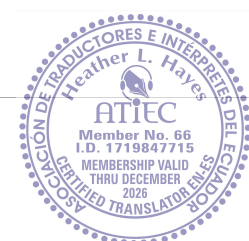
Topic	✓ DO	✗ DON'T
Land use and site boundaries	<ul style="list-style-type: none"> Maintain all works strictly within the defined construction footprint. Prefer previously disturbed areas for worker accommodation, materials storage, and staging areas. Clearly demarcate exclusion zones (vegetation buffers, watercourses, culturally sensitive areas) prior to the start of works. Restore all temporary access roads, haul roads, and disturbed areas to their original condition at project closure. Compensation will be paid promptly at full replacement cost for any damage to crops, trees, structures, or assets. 	<ul style="list-style-type: none"> Enter any work site or community area without the authorization of the Site E&S Officer and the Executor. Working outside the approved site boundary or within demarcated exclusion zones. Damage dwellings, agricultural land, fruit trees, crops, or any community property. Park project vehicles or store materials outside the approved work area.
Watercourses and water resources	<ul style="list-style-type: none"> Maintain a 30-meter buffer zone around all rivers, streams, wetlands, and bodies of water. Refuel vehicles and machinery at least 30 m from any watercourse. Divert runoff from the site through sediment control measures before it leaves the site. Fence the construction area adjacent to watercourses to prevent accidental falls or runoff. 	<ul style="list-style-type: none"> Discharge any substance — chemicals, concrete wash water, sediment-laden water, waste — into any watercourse. Block or alter the flow of any watercourse without prior approval from the PGCA. Use natural water sources (springs, streams, rivers) without authorization from the competent authority.
Noise	<ul style="list-style-type: none"> Limit noisy activities to 07:00–18:00, Monday through Saturday. Provide communities with at least 48 hours' advance notice prior to exceptionally noisy activities. Turn off vehicle engines and generators when they are not in use. 	<ul style="list-style-type: none"> Carry out any noisy construction activity at night or on Sundays/public holidays without the community's prior consent. Exceeding the agreed noise levels near schools, health facilities, homes, or natural habitats.
Dust and air quality	<ul style="list-style-type: none"> Water unpaved roads and stockpiles with water during dry periods to control dust. Cover all stockpiles of dusty material with tarpaulins when not in use. Revegetate all disturbed areas as soon as construction activities in each area are complete. Drive slowly on unpaved roads — maximum 20 km/h. 	<ul style="list-style-type: none"> Store cement, sand, or excavated material without protective covers. Remove vegetation not required for the approved works. Allow vehicles transporting loose materials to operate without a cover.
Waste management	<ul style="list-style-type: none"> Keep the construction site clean and orderly at all times. Carry out daily cleaning of the work area. Segregate waste on site into labeled containers: general waste, recyclable waste, organic/food waste, and hazardous waste. 	<ul style="list-style-type: none"> Burn any type of waste — open burning is strictly prohibited. Dispose of waste in any unauthorized area, particularly near watercourses or in natural areas. Leave sharp or dangerous objects within reach of children or community members near the site.



	<ul style="list-style-type: none"> • Dispose of all waste at authorized disposal sites. Coordinate with local authorities for transportation. • Reuse excavated soil for backfilling and landscaping before disposing of it off-site. • Store hazardous waste in diked storage areas with secondary containment, appropriately labeled, and with restricted access. 	
Hazardous materials	<ul style="list-style-type: none"> • Store fuels, oils, chemicals, and paints on an impermeable base with secondary containment, in enclosed, labeled storage. • Use drip trays during refueling and machinery maintenance. • Maintain a hazardous materials register listing all chemicals, quantities, and safety data sheets. • Install warning signs in hazardous materials storage areas. 	<ul style="list-style-type: none"> • Smoke near hazardous materials or fuel storage areas. • Store or handle hazardous materials near waterways or drainage channels.
Fire Prevention	<ul style="list-style-type: none"> • Take all precautionary measures to prevent fires caused by project activities. • Keep fire extinguishers accessible on site at all times. Train all workers in fire response procedures. • Store flammable materials away from sources of ignition. 	<ul style="list-style-type: none"> • Light any open fire for any reason, including the burning of waste. • Discard cigarette butts on the ground near vegetation or materials.
Employment and labor rights	<ul style="list-style-type: none"> • Implement a fair and transparent recruitment process. Prioritize local employment where skills allow. • Provide workers with clear contracts in their language before work begins, specifying remuneration, working hours, and rights. • Pay wages equal to or above the legal minimum wage, on time and in full. • Provide separate sanitation facilities for female and male workers. • Allow workers to submit grievances through the MARR without fear of retaliation. 	<ul style="list-style-type: none"> • Employ any person under 18 years of age in any capacity. • Use forced labor in any form, whether in conditions of servitude or compulsion. • Discriminate against workers or candidates on the basis of gender, age, ethnicity, disability, religion, or other characteristics.
Code of Conduct for Workers	<ul style="list-style-type: none"> • Treat all members of the community with respect and dignity at all times. • Follow community protocols when working in or near Indigenous territories. • Use the designated sanitation facilities on site. • Report any concern, incident, or complaint to the Site E&S Officer or the Community Liaison Officer. 	<ul style="list-style-type: none"> • Enter homes, gardens, or community agricultural plots without an explicit invitation. • Consume alcohol or illicit substances during work hours or in community spaces. • Engage in any form of sexual solicitation, exploitation, abuse, or harassment (SEAH). Zero tolerance: immediate removal and referral to the authorities.



Community security		<ul style="list-style-type: none"> • Hunt, trap, fish, or collect wildlife or plants from the surrounding environment. • Photograph community members, sacred sites, or ceremonies without explicit consent. 	
	<ul style="list-style-type: none"> • Secure the perimeter of the worksite at the end of each workday. • Cover and fence off all excavations, trenches, and openings left open at the end of each day. • Install clear warning signs and lighting at the site entrances and along the site boundaries near residential areas. • Notify the relevant authorities immediately if underground utilities (water, gas, electricity) are accidentally damaged. • Establish and maintain a community grievance mechanism accessible to all affected persons. 	<ul style="list-style-type: none"> • Leave holes or openings without secure and clearly marked covers or fencing. • Exceed speed limits in project vehicles in or near communities. 	
	Biodiversity and natural habitats	<ul style="list-style-type: none"> • Inspect all incoming equipment, vehicles, and materials for invasive species before they enter the site. • Stop work and report to the Site EHS Officer if nesting wildlife or sensitive species are observed. • Use only locally native species for site restoration and landscaping. 	<ul style="list-style-type: none"> • Hunt, capture, or collect any wild animal or plant on the site or in its surroundings. • Introduce any non-native plant species in restoration or landscaping. • Disturb areas designated as exclusion zones due to ecological sensitivity.
	Indigenous peoples and cultural heritage	<ul style="list-style-type: none"> • Confirm that the signed CPLI Agreement is in force before mobilizing to any Indigenous territory. • Inform all workers about community protocols prior to entering Indigenous territories. • Stop work and report immediately if any object or site of cultural heritage or archaeological significance is discovered — follow the Chance Finds Procedure (Section 4). 	<ul style="list-style-type: none"> • Enter or commence activities in indigenous territories without a signed Consent Agreement. • Photograph, document, or share Indigenous traditional knowledge or cultural practices without the community’s explicit consent. • Disturb, remove, or tamper with any archaeological or cultural heritage find.
Occupational health and safety	<ul style="list-style-type: none"> • Conduct a site-specific hazard assessment before initiating any new activity. • Conduct daily safety briefings at the start of each workday. • Provide all workers with the appropriate PPE for their tasks at no cost—ensure its use is enforced. • Provide one trained first-aid responder for every 25 workers; keep first aid kits on site at all times. • Conduct a pre-employment medical examination for all workers prior to deployment. 	<ul style="list-style-type: none"> • Allow workers to begin work without PPE or without a safety induction. • Attempt to repair damaged equipment or machinery unless authorized or trained to do so. • Use metal ladders near overhead electrical lines. • Allow workers to work alone on remote or hazardous tasks. 	



	<ul style="list-style-type: none"> • Provide sufficient safe drinking water to all workers. Enforce rest breaks. 	
Cleaning and orderliness	<ul style="list-style-type: none"> • Keep all work areas clean, organized, and free of obstructions at all times. • Secure loose materials that may fall and injure workers or members of the community. • Keep aisles, stairs, and walkways clear of materials, cables, and hoses. • Cover and secure open trenches and excavations at the end of each day. 	<ul style="list-style-type: none"> • Allow stagnant water to accumulate in work areas (risk of mosquito breeding). • Store materials at the edge of excavations, trenches, or elevated surfaces.
Traffic Management	<ul style="list-style-type: none"> • Enforce speed limits: 20 km/h on unpaved site roads; comply with national speed limits on public roads. • Equip vehicles with reverse warning alarms; use flaggers when reversing near community areas. • Use local road signage and coordinate with local authorities. • Avoid routes with blind curves near steep slopes or areas heavily used by community members. 	<ul style="list-style-type: none"> • Drive without a valid license. • Use a mobile phone while driving. • Drive under the influence of alcohol or any substance.
Grievances and incidents	<ul style="list-style-type: none"> • Report all community concerns and workers' complaints to the OEC or Site E&S Officer on the same day. • Report all incidents, near-misses, and accidents to the Site HSE Officer immediately.& • Acknowledge receipt of all community complaints within 5 business days and respond within 15 business days. • Inform all interested parties of the BCA Fund MARR contact as an escalation channel. 	<ul style="list-style-type: none"> • Ignore, dismiss, or conceal any incident, near miss, or complaint. • Retaliate against any worker or community member for raising a concern.

Section 4: Chance Find Procedure (Cultural and Archaeological Heritage)

All construction workers must be briefed on this procedure during site induction. Brief workers verbally and in their own language. Post the procedure on the site notice board.

1. Immediately stop all excavation and earthmoving activities in the discovery area.
2. Do not disturb, handle, move, or photograph for commercial use any object or structure discovered.
3. Secure the area with barrier tape or fencing to prevent access by workers and visitors.
4. Immediately notify the E&S Site Officer.
5. The Site E&S Officer shall notify the project Executor and the BCA Fund E&S Safeguards Specialist within 24 hours.
6. The project Executor notifies the Instituto Nacional de Patrimonio Cultural (INPC) or another competent national authority.
7. In indigenous territories, notify the community representatives — they must be invited to participate in the assessment and the decision on how to proceed.
8. Do not resume excavation work in the affected area until written authorization is received from the competent authority.
9. Document the location, depth, date, and description of the discovery in the site's E&S Register.



Section 5: Guidance on Personal Protective Equipment (PPE)

The type of PPE required depends on the specific activity and its associated risks. Before the start of the works, the contractor must: (i) assess the risks of all planned activities; (ii) identify the PPE required for each activity; (iii) procure and provide PPE to all workers at no cost; and (iv) ensure that PPE is used and replaced when damaged. The table below provides generic guidance. All PPE must comply with applicable Ecuadorian and international standards.

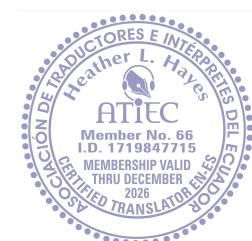
Potential hazard/Activity	Required PPE
General work on site (all workers – minimum requirement)	Hard hat; safety boots; high-visibility vest; work gloves
Falling objects from height; work at height	Safety helmet; safety boots
Dusty environment (earthworks, cement, demolition, dry season)	Dust mask (minimum N95 / FFP2); safety glasses or goggles
Noisy environment (generators, compaction, breakage)	Earplugs or hearing protection (exposure >85 dB)
Falling or rolling of heavy materials and equipment	Safety boots (steel toe cap and steel midsole); safety helmet
Slippery or wet surfaces (tropical rain, riverbanks, boarding onto boats)	Non-slip waterproof footwear; life jacket in and near the water
Rock breaking and work with a stone cutter	Safety glasses; safety helmet; safety boots; gloves
Metal cutting, grinding, welding	Face shield / grinding visor; safety goggles; heavy-duty work gloves; safety boots; fire-resistant clothing
Hazardous light sources (welding)	Welding mask / welding goggles (appropriate shade lens)
Working with electrical equipment, generators, or wiring	Insulating rubber gloves with leather protectors; insulating sleeves; flame-resistant clothing; safety helmet; safety shoes with electrical resistance; face shield
Management of chemical products (paints, solvents, adhesives, pesticides)	Chemical-resistant gloves; safety goggles; dust/chemical mask; long-sleeved protective clothing; closed-toe shoes
Work on or near waterways; travel by boat	Life jacket (mandatory); waterproof boots; consider a wetsuit for prolonged work in the water
Risk of venomous wildlife (all Amazonian field sites)	Protective rubber or leather boots up to the knee; long pants; long sleeves; check clothing and equipment before use
Asbestos removal (licensed specialist only)	Disposable full-body coveralls; P3/FFP3 half-face respirator or full-face respirator; disposable gloves; boot covers
Work at height (scaffolding, roof work, elevated platforms)	Safety harness and lifeline; safety helmet; slip-resistant footwear; edge protection / guardrails

Section 6: Incident Reporting

Incident type	Timeframe	Report to
Death or injury that poses a risk to life	<i>Immediately / within 2 hours by telephone</i>	Emergency services; Ministry of Labor; Project Executor; BCA Fund E&S Safeguards Specialist
Serious injury (hospitalization); AEASH incident; major spill reaching	<i>Within 4 hours</i>	Project Executor; BCA Fund E&S Safeguards Specialist (Serious Incident Report in Annex 8 of the ESMS within 24 hours)



a watercourse; fire; structural collapse		
Minor spill contained on site; minor injury (first aid only); community complaint regarding noise or dust	<i>Within 24 hours</i>	Site E&S Officer; record in the site E&S log; include in the next weekly progress report
Chance find of archaeological or cultural heritage	<i>Immediately</i>	Site E&S Officer → Project Executor → INPC and BCA Fund within 24 hours
Discovery of illegal activity near the site (poaching, illegal logging)	<i>Immediately</i>	Competent national authorities; E&S Safeguards Specialist of the BCA Fund
Encroachment of works in the exclusion zone	<i>Within 24 hours</i>	Site E&S Officer; Project Executor; BCA Fund E&S Safeguards Specialist&



I, Heather Hayes, with national ID number 1719847715, hereby certify that the attached is a complete and accurate English translation of the original Spanish language version of the attached document: *Sistema de Gestión Ambiental y Social (SGAS)*, and that I am competent in both the English and Spanish languages to render such translation.

Signature of Translator

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March 31, 2026

Date

**The translator is a U.S. citizen, certified translator, and member No. 66 of ATIEC (The Ecuadorian Association of Translators and Interpreters), as well as an accredited court translator for Ecuador with accreditation number 18-00207-00006*

