

Main findings: Consultations to obtain FPIC in the Paracel Project in Paraguay

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Introduction and Context

This document presents the main findings identified in the monitoring of some components of the IDB Invest project 13258-01 - PARACELS.A. This report focuses on the consultation process carried out by Paracel (through Fundación Natan) to obtain free, prior, and informed consent (FPIC) in the indigenous communities of the Pãi Tavyterã in the Department of Amambay, located in the project's area of influence¹. The main objective of this research was to learn the perception and level of information the Indigenous Peoples interviewed had regarding the Paracel project and the FPIC process to which they were subjected.

The sources used to guide the work are the following:

- The IFC's "Performance Standard 7" for Indigenous Peoples,
- The "Environmental and Social Review Summary (ESRS)," prepared by IDB Invest in January 2022.²
- The "Estudio del Componente Indígena. Fase 2", Prepared by the Natán Foundation for PARACEL (no release date found).³
- The "Environmental Impact Assessment⁴ Volum-II_Tomo-III_DIAGNÓSTICO AMBIENTAL DEL MEDIO SOCIOECONÓMICO". Prepared by Pöyry Tecnología Ltda. in June 2020.
- The provisions of the Ministry of the Environment and Sustainable Development (MADES) Law 294/93 ENVIRONMENTAL IMPACT ASSESSMENT in relation to the obligations of productive projects towards the local communities affected by them.
- Decree 1039/18 PROTOCOL FOR THE PROCESS OF CONSULTATION AND FREE, PRIOR, AND INFORMED CONSENT WITH THE INDIGENOUS PEOPLES INHABITING PARAGUAY that guides the Institute of the indigenous (INDI).
- Biocultural Consultation Protocol Pãi Tavyterã⁵ prepared by SUNU in 2021.

¹ The "area of influence" of the project has been delimited by the project according to the Preliminary Environmental Impact Study prepared by Pöyry Tecnología Ltda. But there is no clarity around the criteria used to select the communities in the influence area.

² Hereinafter referred to as "ESRS."

³ Hereinafter referred to as "Natán report."

⁴ The Environmental Impact Assessment (Evaluación de Impacto Ambiental) hereinafter will be referred to as "EIA."

⁵ This document is the result of a work process with the Pãi Tavyterã organizations on how they would like to be consulted. It is a work carried out within the framework of negotiations of the Pãi with European companies on the "benefit sharing" stipulated in the Nagoya Protocol for the usufruct of Stevia rebaudiana. Although it is very specific for a particular case, it offers guidelines on how to carry out consultation processes with the Pãi Tavyterã people.

After analyzing these materials, we designed the data collection instrument⁶, the fieldwork proposal, and the methodological approach. We conducted interviews in five indigenous communities: Cerro Akangue, Arroyo Ka'a, Ita Jeguaka, Pãi Reta Chirupoty (Sati), and Guyra Ñe'engatu Amba. The Pãi Reta Chirupoty (Sati) and Guyra Ñe'engatu Amba communities decided to participate in Paracel's project consultation process, while the Cerro Akangue and Ita Jeguaka communities did not give their consent to participate in the consultation according to the IDB Invest's ESRS (page 38). In addition, we conducted interviews with the Arroyo Ka'a community to learn if Paracel consulted them to obtain FPIC. For some reason, they do not appear on the list of consulted communities of the IDB Invest's ESRS.⁷

In addition, we held a meeting with leaders of the two indigenous organizations, Pãi Reta Joaju and Pãi Jopotyra, which gathers almost all the communities in the Department of Amambay as well as leaders of the Archdiocesan Social Pastoral Care of the Departments of Amambay and Concepción.⁸ These meetings aimed to understand better what these communities know about the project and the company.

Methodology

Field interviews with the consulted Indigenous Peoples communities

The data collection instrument developed was a semi-structured interview (see Annex 1). The questions included were adjusted depending on whether the communities accepted or rejected being consulted by Paracel.

First, the interviewers contacted the leaders of the communities to be visited by telephone at least one day in advance to arrange the meeting, asking if they were interested in participating in the interviews. They requested the presence of community leaders and at least four other people who have been present

⁶ See Annex 1.

⁷ According to chapter 4.7 "Indigenous Peoples" of the ESRS (page 37), the IDB Invest mentions that 10 communities provided FPIC, these communities are: Redención, Takuarita, Vy'a Renda, Takuarendyju, Jeguahaty, Pãi Reta Chirupoty – Sati, Guyra Ñe'engatu Amba, Mberyvo Jaguarmi, Yvyty Rove Cerro Po'i, Apyka Jegua. On page 38, they mention that Cerro Akangue and Ita Jeguaka communities did not agree to be consulted because "they believed that the Project will not impact them since none of them utilize these or any other Project estancias to collect resources or for any other purpose."

⁸ Clarification: The Archdiocesan Social Ministry of the Departments of Amambay and Concepción (hereinafter referred to as "Archdiocesan Social Ministry") is a single ecclesiastical structure whose jurisdiction covers both departments of the country.

in the consultations carried out by Paracel. We used a dynamic methodology that aimed for stories to flow freely while ensuring that the interviews did not last more than one hour. This method aims to gather the most information in the shortest possible time.

Before beginning the interviews in the field, Grupo SUNU made a brief introduction and explained the purpose of the meeting and our partnership with the Bank Information Center (BIC). We explained that the interviews were anonymous and requested permission to record the meetings and take photos. We clarified that we aimed to better understand how the company conducted the consultation process to obtain FPIC and verify if Paracel carried out this process in line with its commitments and obligations. After the interviews, we shared a copy of the data collection instrument with the community and additional case information.

Community selection criteria

For the interviews, we selected the two communities that rejected participating in Paracel's consultation process, namely the Ita Jeguaka and Cerro Akangue communities. Both had explicitly expressed their rejection, according to the ESRS. Also, we selected two other communities, the Guyra Ñe'engatu Amba and Pãi Reta Chirupoty (also known as Sati), who agreed to participate in the consultation process by Paracel. One other community that we interviewed is the Arroyo Ka'a community. Although it is not mentioned in the IDB's Invest ESRS, we had information that they had been consulted on more than one occasion in the Paracel consultation process and rejected participation.

We prioritized connecting and reaching out to the Pãi Tavyterã regional associations and the community leaders with whom we have a previous relationship. Another criterion for selecting the Pãi Tavyterã communities with whom we spoke was accessibility to their location.

Meetings with other indigenous and non-indigenous organizations

Indigenous organizations: We met with the main leaders of the Pãi Reta Joaju and Pãi Jopotyra associations to validate the methodological approach, gather information regarding the Paracel project, and share relevant information that they had in this regard. Likewise, we consulted with them about their intentions to accompany advocacy processes in case they consider it a necessary step.

Organized Civil Society: We met with representatives of civil society organizations and the Archdiocesan Social Welfare to share the preliminary research results and verify and share information regarding the project. Likewise, we requested a list of local actors (**see Annex 2**) who might be interested in giving their perspectives on Paracel.

Main Findings

The main findings of the interviews are presented in the tables below. These show the answers given by the communities interviewed with the questions of the data collection instrument.

Table 1

Responses from communities that expressed their rejection to participate in the consultation process	Community Cerro Akangue	Community Ita Jeguaka	Community Arroyo Ka'a
General information	Interview date: 08/10/22 Eight community members participated in the interview. Three women and five men.	Interview Date: 08/11/22 Seven community members participated in the interview. Six women and one man.	Interview date: 08/10/22 Twelve community members participated in the interview: Seven women and five men.
1. Clarify first if they refused to be consulted or rejected the installation of the project after being consulted.	Paracel held the meetings in the community, and then the community gave their refusal to continue consultations. Paracel (through Fundación Natán) organized two meetings in the community, and the community rejected the third one. They said that as soon as they understood that Paracel was doing a consultation to obtain FPIC, they rejected it because it seemed to them that this was not clear from	Paracel held the meetings in the community, and then the community gave their refusal to continue consultations. Paracel had two meetings in the community. Already in the first one, the community gave their rejection, but they also rejected again in the second meeting. Additional Information: - The community did not understand that they were the subject of a consultation in this case. Hence, their rejection was not specifically to the FPIC but to the representatives of Paracel continuing to hold meetings in the community.	Paracel held the meetings in the community, and then community members gave their refusal to continue consultations. They had 3 meetings in total, and they stated that in the second and third meetings, they expressed their rejection.
2. What do you think was the purpose of the consultation? Why do you think they contacted you?	At first, the community thought the consultation was to meet a charity organization that wanted to work with their community. They thought they were contacted to explain that charity project.	The community thought the consultation was to receive aid from a "charity" organization. They felt they did not receive a good explanation or reason for what the charity offered them. They claimed not to have received complete information about who or which entity would provide the help or support.	The community mentioned that they were told only that the company wanted to get in touch with them to discuss a project for planting eucalyptus trees. The community emphasized that the entire contact and consultation process was carried out in an arrogant and uncoordinated manner since the team carrying out the meetings was insistent in asking the community to receive them.

<p>3. Who are the people who contacted you to carry out the consultation? Did they identify themselves? Did they make any prior requests to the community to be able to participate in the consultation process?</p>	<p>The community members did not remember who called the leaders for the meeting, nor did Paracel notify who or how many people were going to meet within the community. The community considers that once in the meetings, representatives from Paracel introduced themselves nicely even though they could not remember who exactly the consultants were (that is, who the people who met with their community represented). The company did not make any requests before the meeting with the community.</p>	<p>The community members did not remember well the names of the people who contacted and participated in the meetings and the name of the organization they represented. However, they remember that they introduced themselves well when they arrived in the community.</p> <p>They did not make any requests before the meeting.</p>	<p>They do not remember the names of the people who contacted and participated in the meetings or the name of the organization they represented. However, they remember that the representatives introduced themselves well when they arrived in the community.</p> <p>Before the meeting, they asked them to gather people from the community as quickly as possible.</p>
<p>4. What do you think of the Paracel company project to install a pulp mill and eucalyptus plantations? What is your assessment of it?</p>	<p>The community expressed a lot of confusion about it. They did not understand the relationship between the consultation carried out in the community and the pulp mill construction. They neither knew where the plant was going to be built nor did they know that it was a pulp mill. They only knew that it was a 'factory,' but they knew that the company was offering employment positions for a "big construction" opportunity in the area.</p> <p>They said they have no issues with the factory, but they are very afraid of the negative environmental impacts that eucalyptus plantations could generate in their territories. They recalled the environmental conflicts with a neighboring ranch that planted sugar cane whose owners would also be from the Zapag Group (the same as Paracel).</p>	<p>The community didn't know about the pulp mill project but had information about the eucalyptus plantation. They didn't remember the name of the company Paracel. They knew a factory was going to be built, but they didn't know where.</p>	<p>They don't know about the pulp mill project, but they do know about the eucalyptus plantation. They didn't remember the name of the company Paracel.</p> <p>They emphasized that the meeting and the information provided were confusing since the relationship between the factory and the eucalyptus crops was unclear.</p>

<p>5. Was information about the project shared with the community? If so, what kind of information was shared with the community, and in what format? For example, ppt presentation, flip charts, audiovisuals, etc.). Do you have any copies of these documents?</p>	<p>Information was shared. They state that most of what was shared was only spoken (in Guarani), and although they remember that they used a map at one point, they hardly remember what was said in the meetings. They said that there was a lot of talk about the possibility of working in the Eucalyptus plantations.</p> <p>They did not leave documents of the project presentation in the community. Still, one of the leaders remembers that they left “some papers,” but he did not know the content (we assumed it was the EIE, but when we asked him about it, they stated that they did not talk about the EIE, they were not familiar with the term).</p> <p><u>Additional Information:</u></p> <p>- In the Natán Report (p. 418), there is a note sent and received by the INDI from the Fundación Natán in which they state that they have socialized and delivered an “EIA.”</p>	<p>Information was shared. The communities remember that they offered the possibility of working on the plantations and also that the community could receive assistance for some community projects. They showed some maps that they did not remember what content they had. The vast majority of what was shared was spoken (in Guarani).</p> <p>The leader stated that the consultants left her a document. Still, she does not know its content (we assumed it was the EIE, but when we asked her about it, they stated that they did not speak of the EIE, nor were they familiar with the term).</p> <p><u>Additional Information:</u></p> <p>- In the Natán Report (p. 418), there is a note sent and received by the INDI from the Natán Foundation in which they state that they have socialized and delivered an “EIA.”</p>	<p>Information was shared, but according to the communities, it was disordered and incomplete. They emphasize the fact that the INDI representative was very arrogant. They remember that they showed a map but did not remember what it had.</p> <p>They did not leave any documents.</p>
<p>6. Do you consider that you were informed about the impacts, risks, and opportunities and about the recommended measures to mitigate adverse impacts and enhance positive impacts of the construction of the Parcel Plant in your community?</p>	<p>The community members said the adverse impacts and risks of the project and measures to mitigate them were not reported at the meetings. Much more emphasis was placed on the project’s positive components, benefits, and the work to be done.</p>	<p>Community members said that they did not report anything about the negative impacts of the project in their community or about ways to mitigate those impacts, only about the possibilities of work in the crops and the community projects of the Parcel company.</p> <p>They stressed that they did not pay much attention to what the company representatives explained because, in the second meeting, they asked for the ID documents of the participants without explaining what they would be used for, which generated mistrust and disinterest in the meeting.</p>	<p>They recalled that they talked about some environmental risks regarding pollution. But they also stated that a lot of emphasis was placed on the positive aspects of the project, specifically the corporate social responsibility projects of the company from which they could benefit and the job and employment offer on the eucalyptus plantation.</p>

<p>7. Why did they express disagreement to participate in the consultation process to which they were invited? Did your disagreement to participation in the consultation process mean your rejection of the project? How did you express your disagreement? Did you sign any documents? Do you consider that if you participated in the consultation process to which you were being invited, that implied accepting the Parcel project?</p>	<p>The community rejected the project for the following reasons:</p> <ul style="list-style-type: none"> • They did not understand the information the company representatives shared with them. • The meeting invitations were not organized in time or properly. • They considered the approach of the people who held the meetings in the community on behalf of Parcel was bad, which generated a lot of mistrust in the entire consultation process. • This approach also seemed not very transparent to the community since the company representatives did not share the documents or minutes they prepared after each meeting with the community. • The communities' concerns about environmental risks and impacts were not properly addressed at the meetings. • The community said they expressed their disagreement orally at the meeting but did not sign any document. They also did not know if the company representatives recorded their rejections in the minutes because they did not share them with the community. <p><u>Additional Information:</u></p> <ul style="list-style-type: none"> • There is a major inconsistency between the information we got from the community and what is reported in the IDB's Invest ESRS. According to the IDB's Invest ESRS (p. 38), the community decided "not to consult because they believed that the Project would not impact them since none of them use these Projects stays or any other to collect resources or for any other purpose." • According to the Natán Report (p. 333), the community expressed "their voluntary desire not to participate in the consultation process because, as they themselves mention, they do not use the land that will be used by the Parcel undertakings for the use of ecosystem services or for the realization of ancestral practices and customs." 	<p>The community rejected the project for the following reasons:</p> <ul style="list-style-type: none"> • They did not understand the information that was shared with them. • The representatives of Fundacion Natán asked for identification documents of the people without explaining why they needed the ID documents. Likewise, they also requested the legal status and title of the community. Community members thought they wanted to scam them. • The community members expressed their rejection orally at the second meeting they had in the community. They also did not know if they recorded their rejection in their minutes since they were not shared with the community. <p><u>Additional information:</u></p> <ul style="list-style-type: none"> • There is a major inconsistency between the information we got from the community and what is reported in the IDB's Invest ESRS. According to the ESRS (p. 38), the community decided "not to consult because believed that the project would not impact them since none of them use these Projects stays or any other to collect resources or for any other purpose." • According to the Natán Report (p. 333), the community expressed "their voluntary desire not to participate in the consultation process because, as they themselves mention, they do not use the land that will be used by the Parcel undertakings for the use of ecosystem services or for the realization of ancestral practices and customs." 	<p>The community rejected the project for the following reasons:</p> <ul style="list-style-type: none"> • The community believed that the company representatives did not offer a good explanation about the company and the implications of the project for their communities/territories. • They insisted a lot on signing documents without giving explanations about it. • They asked for identification documents of the people without explaining why. Likewise, they also requested the legal status and title of the community. • They did not trust the people who came to hold the meetings, especially the INDI representative. • The invitations to the meetings were not organized in time or properly. They felt very pressured. <p>They expressed their rejection orally at the second meeting and once again at another community meeting.</p>
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<p>8. After having expressed your disagreement, the people who contacted you to participate in the process insisted again? What did they propose to insist on again?</p>	<p>They insisted once again on going but were ignored by the community leaders who were contacted. They went to the community anyway, taking advantage of a food assistance meeting from the government, but the people in the community ignored them.</p>	<p>Once more, a person (they don't remember who) returned to try to have another meeting but was received with great disinterest, and that person was unable to call another meeting.</p>	<p>After rejecting the consultation, the company representatives once again held another meeting in the community, practically by surprise and without prior coordination. The community also gave their rejection in this second meeting. They again insisted on calling one of the leaders, but the community leaders ignored them.</p> <p>They remember the Paracel representatives wanted to invite groceries and a community lunch on that second opportunity. Still, they rejected these.</p>
<p>9. Is there/was there any inconvenience in the community related to the project that you would like to share?</p>	<p>They insisted once again on going but were ignored by the community leaders who were contacted. They went to the community anyway, taking advantage of a food assistance meeting from the government, but the people in the community ignored them.</p>	<p>Once more, a person (they don't remember who) returned to try to have another meeting but was received with great disinterest, and that person was unable to call another meeting.</p>	<p>After rejecting the consultation, the company representatives once again held another meeting in the community, practically by surprise and without prior coordination. The community also gave their rejection in this second meeting. They again insisted on calling one of the leaders, but the community leaders ignored them.</p> <p>They remember the Paracel representatives wanted to invite groceries and a community lunch on that second opportunity. Still, they rejected these.</p>
<p>9. Is there/was there any inconvenience in the community related to the project that you would like to share?</p>	<p>Community members stated that because the representatives from Fundacion Natan arrived in an unplanned manner, many people in the community thought they had made a secret agreement with the main leaders in the community, which caused conflicts and tensions within the community.</p> <p>Due to the lack of clarity with the information received, they initially thought that the consultants were there to plant eucalyptus trees in the community, which caused them great anguish and concern.</p>	<p>There was no inconvenience.</p>	<p>The community expressed that they are very scared because their community does not have the title to their land, which is still in conflict due to a large overlap with a ranch belonging to the Zapag Group, with which they had previously had other problems.</p>

<p>10. Do you consider that there is any reason to believe there is a risk of retaliation for not having agreed to participate in the consultation process to which they were invited?</p>	<p>The community fears that they can stop receiving support and/or assistance from the government institutions and some neighboring ranchers with whom they maintain close relations.</p>	<p>The community thinks not.</p>	<p>The community thinks not.</p>
<p>11. Additional Comments</p>	<ul style="list-style-type: none"> - One aspect of the meeting that they say caused them great displeasure is that the INDI representative stated that it was important for the community to accept the project, considering that it has a high political status community, which would make it easier for the rest of the communities to accept the consultation processes. This generated a particular disgust and a huge distrust towards the project. - At the end of the interview, the information of the ESRS and INDI Memorandum No. 28/2022 (see Annex 3) on the justification for why they rejected the consultation was shared with the community. The community categorically rejected what was stated in those documents. - Memorandum No. 28/2022 of the INDI is ambiguous since it states that the community gave its "consent to the consultation," which contradicts the ESRS and the Fundacion Natan Report. 	<ul style="list-style-type: none"> - The community stated that they are scared that the project will continue and negatively affect them, especially the stream they use a lot in the community since it runs long distances. They believe that it passes through the ranches that will be affected by the project. - At the end of the interview, the information in the ESRS and the INDI Memorandum No. 28/2022 (see Annex 3) on the justification for why they rejected the consultation was shared with the community. The community categorically rejected what was stated in those documents. - Memorandum No. 28/2022 of the INDI is ambiguous since it states that the community gave its "consent to the consultation," which contradicts the ESRS and the Natan Report. 	<ul style="list-style-type: none"> - The community considered that the treatment they received from the INDI "secretary" who accompanied the delegation was impolite and even aggressive. - The consultation of this community does not appear in the ESRS and the Natán Report. However, INDI Memorandum No. 28/2022 states that they visited the Arroyo Ka'a community on December 15, 2020.

Table 2

Responses from communities that agreed to participate in the consultation process and accepted the project	Community Pāi Reta Chirupoty (Sati)	Community Guyra Ñe'engatu Amba
<p>General data of the interviews</p>	<p>Date of the interview: 08/11/22</p> <p>Three community members joined the interview with Grupo SUNU, all women.</p>	<p>Date of the interview: 08/11/22</p> <p>Seven community members joined the meeting with Grupo SUNU, four women and three men.</p>
<p>1. Who called the consultation? How did they communicate with your community? Who are the people who made the consultation? Did they correctly identify themselves and their institution?</p>	<p>The community members do not remember the names of those who contacted them, but they state that they identified themselves properly when they arrived in the community. The project representatives had 2 meetings in the community.</p> <p>The community members said they rejected the third meeting since they no longer trust the project.</p>	<p>The community members remember the names of the people who contacted them and went to the community and said they identified themselves correctly. They had three meetings with the representatives of the project in the community.</p> <p>They stated that, in reality, they rejected the project and the continuation of the meetings.</p>
<p>2. What do you consider was the objective of the meeting/consultation? Did they make any prior requests to the community before the meeting?</p>	<p>The community members thought that the Parcel representatives came to explain “a work proposal” in neighboring ranches and for the construction of a factory (they did not know that the factory belonged to Parcel). They thought the objective of the meeting was because the company was looking for workers.</p> <p>They did not make any previous requests.</p>	<p>The community members stated that they thought the meeting was to receive a community assistance project and propose community members’ employment to work on the eucalyptus plantations.</p> <p><u>Additional Information:</u></p> <p>It is important to clarify that the project representatives contacted the previous leader to initiate the consultation processes. He participated in the interview and stated that he knew the objective of the proposed meetings.</p>
<p>3. Do you think you had the necessary information to carry out informed negotiations before the consultation? If so, what information was shared with the community before the consultation process?</p>	<p>The community members claimed they did not have all the necessary information about the project. They also mentioned that they did not understand that they were being subjected to a consultation to provide FPIC.</p> <p>Before the meetings, the company representatives asked the community to gather people from the community all together to talk about a project.</p>	<p>The previous community leader stated that they explained the project well to him when they spoke on the phone. Still, when they reached the community, the project representatives did not share the information correctly and completely.</p> <p>They stated they were unaware they were being subjected to a consultation to provide FPIC.</p>

<p>4. Do you consider that you had the proper time to discuss and analyze the impacts, risks, and opportunities and recommended measures to mitigate adverse impacts and enhance positive impacts of the construction of the PARACEL Plant in your community?</p>	<p>Community members mentioned that they did not talk about the cellulose plant but only about the eucalyptus plantations. They also stated that they did not talk about the negative impacts of the project or mitigation measures.</p> <p>They stated that one of the reasons why they rejected a subsequent meeting was because the project representatives focused more on obtaining information from the people and the community rather than sharing information with them about the project.</p>	<p>Community members stated that they only talked about the possibility of assistance at the community level and the possibility of working on neighboring ranches that were going to grow eucalyptus. They did not know the pulp mill or remember the name "Paracel."</p>
<p>5. How would you rate and characterize the consultation process? Were you informed that it was for granting prior free and informed consent?</p>	<p>The community members stated that they rejected the project. It was unclear to them that the meetings were within the framework of an FPIC process. There was no clarity in the information given.</p> <p>They pointed out that the INDI representative advocated a lot for the company and the project, which influenced their opinion on the project.</p>	<p>The community stated that they rejected the project. It was unclear to them that the meetings were within the framework of an FPIC process.</p> <p>They also stated that the project representatives had weird attitudes; for example, they requested the community ID documents of people and other documents such as the legal title of the property. This generated a lot of mistrust in the process.</p>
<p>6. Do you consider that the manner and language in which the information was shared during the consultation were adequate for your understanding and effective participation? (For example, ppt presentations, flip charts, audiovisuals, etc.) were used. Do you have any copies of these documents? Do you think that the person(s) in charge of the consultation were knowledgeable about your culture?</p>	<p>The community stated that the information about the project was indeed shared in the second meeting the project representatives had in the community, but most of it was in Guarani but the community also remembers that they showed maps. In this regard, they believe there was a bad approach to the work carried out by the people who held the meetings, so they do not consider that the project representatives were people who knew the Pãï culture.</p> <p>The leader commented that they left her a notebook, but she does not remember the content or the name since she did not read it.</p>	<p>The community members stated that information was shared with the community, which was all orally (in Guarani) except for some maps they showed in which they remembered that the ranches where the eucalyptus plantations are going to be planted were listed.</p> <p>They left the FPIC Natán Report for the community and an EIE report for the project. When asked if they fully knew the content of these documents, they stated that they did not, nor do they remember having talked about this content in the meetings.</p> <p>They do not consider that the project representatives were people who knew the Pãï culture.</p>
<p>7. Do you think the information shared was enough to understand what the project is about and the long-term impacts it will have on the community? Do you have any questions or concerns about the project's social and environmental impacts and risks? What do you think of the project?</p>	<p>The community members stated they didn't have enough information about the project and its long-term impacts. After the meetings, they were concerned about the negative environmental impacts.</p> <p>The community does not have an integral assessment of the project, and they stated that they do not know about the impacts of eucalyptus plantations.</p>	<p>Community members stated they were unclear about the project and could not assess it.</p>

<p>8. How many meetings did you have? Do you consider that there was good community participation in the consultation process? (For example, asking specifically about the participation of women, children, and people with disabilities).</p>	<p>They had two meetings in total. Although they do not remember that specific requests from participants have been made, they believe there was good participation.</p>	<p>They had three meetings in total. Although they do not remember that specific requests from participants have been made, they believe there was good participation.</p>
<p>9. Do you consider that you gave your consent/conformity for PARACEL to advance with the construction of the Pulp Mill? Was anything mentioned about Paracel's social responsibility programs and how your community can benefit from them? Why did the community agree to the project?</p>	<p>The community members didn't consider that they gave their consent for the construction of the pulp mill, only to receive support from the company to the community. They do not remember that the project representatives mentioned a social responsibility program, but they do remember that the community's needs were surveyed.</p> <p>Community members said that they first found the work proposal for the people and community aid projects interesting.</p>	<p>The community members considered that they did not give their consent to the project since they did not know about the pulp mill, only to receive Paracel's social projects in the community. They do not remember that a social responsibility program was mentioned, but they do remember that the community's needs were surveyed.</p> <p>The community members said that they first found the work proposal for the people and community aid projects interesting.</p>
<p>10. Do you consider that enough time was given to negotiate, deliberate, and make a decision?</p>	<p>Community members stated that they felt pressured to accept the meetings and make decisions.</p>	<p>Community members stated that they felt pressured to accept the meetings and make the decision.</p>
<p>11. How did they express your agreement? Did you sign an agreement, or is there any evidence of an agreement between both parties regarding the outcome of the negotiations? Has the agreement between the parties included the requirements to develop plans such as a Community Development Plan or a Plan for Indigenous Peoples, was anything incorporated in this regard?</p>	<p>Community members remembered that in the second meeting, they signed a document provided by the INDI representative. Still, they did not know what it said, nor was it read aloud (we assume it was the FPIC minutes). They don't remember discussing a "plan," only community projects.</p>	<p>Community members remembered that in the three visits they had, documents were signed, but they did not know what these documents were. They don't remember discussing a "plan," only community projects.</p>
<p>12. Were some people in your community opposed to the construction of the pulp mill?</p>	<p>At the time of the consultations held by the project representatives, the community stated that they did not know or have information about the pulp mill construction. They stated that the possibility of receiving aid and the job offer interested the entire community.</p>	<p>At the time of the consultations held by the project representatives, the community stated that they did not know or have information about the pulp mill construction. They stated that the possibility of receiving aid and the job offer interested the entire community.</p>
<p>13. Do you think you have the possibility of rejecting the project if you consider it necessary?</p>	<p>At the interview, community members stressed that the community rejected the project. Specifically, the project proposal for the community, not the construction of the factory.</p>	<p>At the time of the interview, community members stressed that the community rejected the project. Specifically, the project proposal for the community, not the construction of the factory.</p>

<p>14. Is there/was there any inconvenience in the community related to the project that you would like to share?</p>	<p>Community members emphasized that in the second meeting, the project representatives had requested their ID documents without giving a good explanation in this regard. They believed that they were deceived since they had arranged for a visit to the community by Paracel to start working in the next few months after the second meeting. But this did not happen. But they contacted each other again a long time later, so they did not accept another visit anymore.</p>	<p>Community members commented that in the second meeting, the project representatives requested their ID documents and began to take censuses. In this regard, they did not give good information, which generated many doubts and fear regarding the possibility that community members could be deceived. Community members believed they were deceived since they had arranged for Paracel's visit to the community to start working in the next few months after the second meeting. But this did not happen. But they contacted each other again later, so they did not accept another visit anymore.</p>
<p>15. Additional Information</p>	<p>Community members maintain that during the consultation, Paracel representatives offered the possibility of supporting eucalyptus plantations in the community. They believe this was because the community has a few families relative to its size. They fear this will make them the subject of offers to rent their land for eucalyptus plantations.</p>	<p>The community members remembered that in the second meeting, they explicitly requested to know the content of the minutes and documents that the visitors prepared after each meeting. For this, they even asked the community school teacher to accompany the meeting to read said comments at the end, but this was denied. When asked why they were not allowed to know the content of the documents, the company's representatives argued that it was prohibited for them to share it, which caused a lot of displeasure.</p>

Table 2

Other additional meetings	Other Indigenous Peoples Organizations	Archdiocesan Social Ministry (ASM)
<p>General data of the meeting</p>	<p>Interview date: 08/09/22</p> <p>Participated in the interview: Nine members of the organizations.</p> <p>Place: Casa Pãi Tavyterã, Pedro Juan Caballero, Department of Amambay, Paraguay.</p>	<p>Interview Date: 08/12/22</p> <p>Participated in the interview: Three members of the Archdiocesan Social Ministry.</p> <p>Place: Courtyard of the Chapel of the San Blas Community, Department of Concepción, Paraguay.</p>
<p>1. Are you aware of the Parcel project? Who shared this information with you?</p>	<p>They heard very little about it (they did not remember the name Parcel), they do not know that it is a cellulose plant, nor do they understand the relationship between plant and eucalyptus crops well. As an indigenous organization, they remember that the Government of Amambay invited them to discuss the Parcel project on one occasion. Still, they did not share with us much information about the meeting.</p>	<p>The ASM stated that they understood the project’s magnitude, although they did not know that it was the biggest project in the region and would receive international funding. They have information about the large flow of people the company employs, but they said they barely knew the project.</p> <p>They expressed great concern since they have had terrible experiences with other large factories constructed in the area.</p>
<p>2. Do you think there was an effort on account of Parcel to publicize the project? Do you have any concerns about the project?</p>	<p>Indigenous organizations considered that there were not many efforts to disseminate information about the project and generally have a very poor assessment of the meetings held in the communities.</p> <p>They do not know how many communities were consulted. They also do not know that they were subjected to FPIC to seek consent for the plant’s construction. They expressed concerns about the environmental impacts.</p>	<p>One of the key concerns the ASM expressed is the lack of information disclosure and dissemination around the project, especially by the government, which has not promoted public discussions about it.</p> <p>They mainly fear the project’s environmental impacts, especially considering that it is a mega investment project and that the governments are not making real efforts to control it.</p>
<p>3. What actions would you like to take regarding the Parcel project?</p>	<p>Indigenous organizations expressed interest in taking various actions to defend their territory and its people</p>	<p>They expressed interest in taking the necessary actions to guarantee the proper implementation of the project. In the short term, they are interested in holding a forum among the identified local actors to discuss the Parcel project.</p>

Summary of Main Findings

Below, we present a summary of the main findings shared in tables 1, 2, and 3.

A) Interviews with Indigenous Peoples Communities

- 1. Lack of *meaningful* consultation that could result in *genuine consent*:** The communities were unaware that the company representatives sought the approval of the Paracel project through the FPIC. This point is important since it was the first time the communities were subjected to FPIC since the approval of Decree 1039/18. In most cases, the company representatives arranging the meetings with the communities showed a profound lack of knowledge of the Pāi Tavyterā culture. As stated by a community member of Cerro Akangue in the following testimony: *"We believe that those people (those in charge of carrying out consultations with the communities) didn't know how we like to meet and make decisions, the Pāi are very assembly-oriented, and it takes time for us to make decisions, we need to consult among ourselves and also with our Tekoha Ruvicha (spiritual leaders), and only then we can decide."*
- 2. Lack of *free* consultation:** In many cases, indigenous communities perceived a clear intention to force agreements with them, restricting freedom of expression and closing space for genuine deliberation free of manipulation. Special emphasis was placed on the role of the INDI officials (Instituto Paraguayo del Indígena) (INDI) who accompanied the meetings, who, far from acting as protectors of the rights of Indigenous Peoples, have used their influence to try to condition the communities to accept the project. This point is clearly stated in the following testimonies by members of the community Arroyo Ka'a and the Pāi Reta Chiru Poty-Sati: *"At first, we thought that the INDI representative was just another project official, not someone who supposedly has to watch over us. Every time we made an intervention expressing doubts about the project, he treated us badly as"; "due to the insistence of the INDI official, we ended up saying yes to everything they shared with us in the meetings."*
- 3. Lack of *prior* consultation:** In most cases, community members stated that the requests for community meetings were made with

little preparation time and that they had little information about the project before the consultations, especially about the project's social and environmental risks and impacts.

- 4. Lack of *informed* consultation:** There was a lack of clarity about the information shared by the project representatives with communities and a lack of transparency in the administrative procedures of the consultation. Little effort was made to explain the project's negative social and environmental impacts and the mitigation measures to address those impacts. Also, community members mentioned that the project representatives dedicated most of their time to highlight the project's positive components, such as employment opportunities. Many community members said they didn't know about the installation of the pulp mill as part of the project. As stated in the following testimony by one community member of Cerro Akangue: *"In all the meetings, they talked about many things very quickly, that's why I hardly remember what they told us."*
- 5. Lack of *transparency*:** The project representatives did not share or socialize the meeting minutes, or any official documents developed during the consultation, after time was spent communicating with the communities.
- 6. Lack of strong FPIC process in line with PS 7 carried out:** The interviewed communities do not have enough information on the Paracel project, and it cannot be determined that a robust FPIC process was carried out in line with the requirements of PS 7.
- 7. There is a major inconsistency between the IDB's Invest ERSR and the information from the communities who decided not to participate in the consultation process as well as rejected the project**
 - The IDB's Invest ESRS reports that the Cerro Akangue and Ita Jeguaka decided not to participate in the consultations as they believed that the project *"will not impact them since none of them utilize these or any other Project estancias to collect resources or for any other purpose"* (page 37, section 4.7.a.ii Participation and Consent). However, we received a different response when we asked the Cerro Akangue and the Ita Jeguaka communities why they didn't participate in the consultation process. Mainly, the

communities didn't participate because: a) they did not understand the information shared with them; b) the invitations to the meetings were not organized in a timely manner; c) the approach of the people who held the meetings in the community on behalf of Paracel to be bad, which generated a lot of mistrust in the entire consultation process; d) their concerns about the environmental and social risks and impacts of the project were not properly addressed at the meetings; e) The representatives of Fundacion Natán asked for their ID documents without explaining why they needed those documents. They also requested the legal status and title of the community; f) They did not know if the company representatives recorded their rejection in their minutes since they were not shared with the community (**see table 1, row 7 under main findings**).

- Grupo SUNU shared with the Cerro Akangue and Ita Jeguaka communities the information stated in the ESRS (page 37) and the INDI Memorandum No. 28/2022 (**see Annex 3**) about the justification of why they rejected to participate in the consultation process and **the communities categorically rejected what is stated in those documents**.
- The indigenous community Arroyo Ka'a was consulted and rejected the project (**see table 1, row 7 under main findings**). They are not mentioned in the IDB's Invest ESRS and the Natan Report. However, the INDI Memorandum No. 28/2022 states that they visited the Arroyo Ka'a community on December 15, 2020. One point to highlight is that they mentioned during the interview with Grupo SUNU that they are **scared because their community does not have the title to their land, which is still in conflict due to a large overlap with a ranch belonging to the Zapag Group**, with which they had previously had other problems. **The fact that they are not even mentioned in the official documents is concerning because they are in the project's area of influence.**

IDB's Invest ESRS section "4.1.i.iii Community grievance mechanism" mentions that Paracel designed a grievance mechanism specifically designed for indigenous communities; however, in no case were we able to verify that the interviewed communities know anything about it.

9. **The Ministry of Environment and Sustainable Development (MADES) did not approve the EIA before the consultations to obtain FPIC were done with many Indigenous Communities.** The IDB's ESRS states that FPIC was obtained for the ten communities between December 2020 and June 2021 (p. 37). However, in a document requested to the MADES (**see Annex 4**) regarding the approval of the preliminary EIA of the ranches or estancias to be affected by the project, it is observed that the approval dates of EIA vary between 2020 and 2022. This means that the FPIC was obtained in many cases at the same time and/or before the EIA had official approval by the government and that the EIA's information may not have had MADES's evaluation and/or approval before sharing it with communities.
10. **Lack of relevant technical information missing in the Natán report about the consultation process to obtain FPIC was done.** The report does not mention (not even as an annex) what information was shared with the communities about the project. The lack of this information made it impossible to delve into the interviews regarding the quantity and quality of information shared with the communities about the project. Nor does the data collection instrument used for the interviews is shared in the report. Also, the report does not specify whether they analyzed the content of the EIA in each community. And, if it was shared with the communities, it does not clarify how the EIA was shared with them. Also, we could not find information in the Natán report about the names and the professional team in charge of developing the material nor the technical team that accompanied and led the consultation process to obtain FPIC in the communities. This information is key to verifying and contrasting the information collected in this report.

8. **No evidence exists that a community grievance mechanism has been designed and is available for indigenous communities.** The

B) Meetings with other Indigenous Peoples and non-indigenous organizations

1. Lack of information about the project's social and environmental risks and impacts:

Organizations expressed little knowledge regarding a project of such magnitude. Especially because we are talking about organizations that cover a large area and have close ties with their bases. There is no evidence to show real efforts by the public authorities or the company to have an effective and genuine conversation with the communities surrounding the project area. As a member of the Archdiocesan Social Ministry depicts in the following testimony: *"We are scared by how advanced the project is and how little information we have about it. The little discussed speaks only of the project's positive aspects, but at no time are the other more negative aspects of the project communicated."*

Annexes

Annex 1. Data collection instrument for semi-structured interviews

The interviews were developed considering the requirements of the IFC's Performance Standard 7 and implementation Guidelines, information found in the IDB Invest's ESRS, the national requirements contemplated in Paraguay's legislation regarding the consultation process required to obtain FPIC in Paraguay, and some of the criteria of the Biocultural Protocol of Pãï Tavyterã Consultation.

A) Questions for communities that rejected participating in the consultation process:

1. Clarify first if they refused to be consulted or rejected the installation of the project after being consulted.
2. What do you think was the purpose of the consultation? Why do you think they contacted you?
3. Who are the people who contacted you to carry out the consultation? Did they identify themselves? Did they make any prior request to the community to be able to participate in the consultation process?
4. What do you think of the PARACEL company project to install a pulp mill and eucalyptus plantations? What is your assessment about it?
5. Was information about the project shared with the community? If so, what kind of information was shared with the community and in what format? For example, ppt presentation, flip charts, audiovisuals, etc.), do you have any copies of these documents?
6. Do you consider that you were informed about the impacts, risks and opportunities and about the recommended measures to mitigate adverse impacts and to enhance positive impacts of the construction of the PARACEL Plant in your community?
7. Why did they express disagreement to participate in the consultation process to which they were invited? Did your disagreement to participation in the consultation process mean your rejection of the project? How did you express your disagreement? Did you sign any document? Do you consider that if you participated in the consultation process to which you were being invited, that implied accepting the PARACEL project?
8. After having expressed your disagreement, did the people who contacted you to participate in the process insist again? What did they propose to insist again?
9. Is there/was there any inconvenience in the community related to the project that you would like to share?
10. Do you consider that there is any reason to believe that there is a risk of retaliation for not having agreed to participate in the consultation process to which they were invited?

B) Questions for communities that accepted participating in the consultation process:

1. Who called the consultation? How did they communicate with your community? Who are the people who made the consultation? Did they correctly identify themselves and their institution?
2. What do you consider was the objective of the meeting/consultation? Did they make any prior requests to the community before the meeting?
3. Do you consider that you had the necessary information to carry out informed negotiations before the consultation? If so, what kind of information was shared with the community prior to the consultation?

process?

4. Do you consider that you had the proper time and support to analyze the impacts, risks and opportunities and on recommended measures to mitigate adverse impacts and to enhance positive impacts of the construction of the PARACEL Plant in your community?
5. How would you rate and characterize the consultation process? Were you informed that it was for granting prior free and informed consent?
6. Do you consider that the manner and language in which the information was shared during the consultation was adequate for your understanding and effective participation? (For example, did they use ppt presentation, flip charts, audiovisuals, etc.?) Do you have any copies of these documents? Do you think that the person(s) in charge of the consultation were knowledgeable about your culture?
7. Do you think that the information shared was enough to understand what the project is about and the long-term impacts it will have on the community? Do you have any questions or concerns about the project's social and environmental impacts and risks? What do you think of the project?
8. How many meetings did you have? Do you consider that there was good community participation in the consultation process? (For example, asking specifically about the participation of women, children and people with disabilities)
9. Do you consider that you gave your consent/conformity for Paracel to advance with the construction of the Pulp Mill? Was anything mentioned about Paracel's social responsibility programs and how your community can benefit from them? Why did the community agree to the project?
10. Do you consider that enough time was given to negotiate, deliberate and make a decision?
11. How did they express your agreement? Did you sign an agreement or is there any evidence of an agreement between both parties regarding the outcome of the negotiations? Has the agreement between the parties included the requirements to develop plans such as a Community Development Plan or a Plan for Indigenous Peoples, was anything incorporated in this regard?
12. Was there opposition from some people in your community to the construction of the pulp mill?
13. Do you think you have the possibility of rejecting the project if you consider it necessary?
14. Is there/was there any inconvenience in the community related to the project that you would like to share?

Annex 2. List of local actors in the Department of Concepción

Lista de Instituciones y Gremios invitados

- 1). 2 representantes de la FNC.....
- 2). 2 representantes de la OCN.
- 3). 2 representantes de la OCRC.
- 4). 2 representantes de la Asociación Teko Pyahu.
- 5). 3 representantes de de la CEDAC.
- 6). 5 representantes de la UNC.
- 7). 3 representantes de la Universidad Católica.
- 8). 2 representantes de la UTIC.
- 9). 2 representantes de la Universidad San Sebastián.
- 10). 2 representantes de la Parroquia San Antonio.
- 11). 2 representantes de la Parroquia María Auxiliadora.
- 12). 2 representantes de la Parroquia Virgen del Carmen.
- 13). 2 representantes de la Parroquia Don Bosco.
- 14). 2 representantes de la Parroquia Catedral.
- 15). 2 representantes del Centro de Capacitación Laura Vicuña.
- 16). 2 representantes de Colegio religioso San Francisco.
- 17). 2 representantes de Colegio religioso Monseñor Bogarin.....
- 18). 2 representantes de Colegio religioso Santa Teresita.
- 19). 2 representantes de Colegio religioso San José.
- 20). 2 representantes de Colegio religioso Don Bosco.
- 21). 2 representantes de Colegio religioso Sonto Domingo.....
- 22). 2 representantes de la Asociación de Médicos de Concepción.
- 23). 2 representantes de la Asociación de Periodista de Concepción.
- 24). 2 representantes de la OTEP SN.
- 25). 2 representantes de la Cooperativa Medalla Milagrosa.
- 26). 2 representantes de la Cooperativa Universitaria.
- 27). 2 representantes de la Memoria Histórica.
- 28). 2 representantes de GRADEN 21.
- 29). 2 representantes de Colegio religioso Inmaculada Concepción.....
- 30). 2 representantes de Colegio religioso San Luis
- 31). 2 representantes de la Asociación de Profesionales de la Construcción – ASOCON
- 32). 2 representantes del Ozae.
- 33). 2 representantes de la UTCD.
- 34). 2 representantes de la UPAP.
- 35). 2 representantes de Colegio religioso María Auxiliadora.
- 36). 2 representantes de la FEP.
- 37). 2 representantes de Asociación de Enfermeras de Concepción.
- 38). 4 representantes de la UNEPY.
- 39). 4 representantes de la FENAES.
- 40). 4 representantes de la Pastoral Juvenil.
- 41). 2 representantes de la Cooperativa de Educadores de Concepción.
- 42). 2 representantes de la Asociación de pescadores de Concepción.....
- 43). 2 representantes de la Comisión Conciencia Ciudadana
- 44). 2 representantes de Tercera Edad
- 45). 2 representantes Escuela Agrícola Hermana Azul Saladillo.....
- 45). 2 representantes Escuela Agrícola de Concepción
- 46). 2 representantes de CREC
- 47). 2 representantes de Asoc| de Profesores del CREC

Annex 3. Memorandum n.º 28/2022 (Source, INDI)

Instalación de Planta de Celulosa PARACEL	Empresa PARECEL Fundación NATAN	Pai Tavytera	Yvyty Kovi	Bella Vista Norte	Amambay	15 de diciembre 2020
Instalación de Planta de Celulosa PARACEL	Empresa PARECEL Fundación NATAN	Pai Tavytera	Arroyo Ka'a	Bella Vista Norte	Amambay	15 de diciembre 2020
Instalación de Planta de Celulosa PARACEL	Empresa PARECEL Fundación NATAN	Pai Tavytera	Apykajegua	Bella Vista	Amambay	15 de diciembre 2020
Instalación de Planta de Celulosa PARACEL	Empresa PARECEL Fundación NATAN	Pai Tavytera	Pai Renda Cheiru Poty	Bella Vista Norte	Amambay	16 de diciembre 2020
Instalación de Planta de Celulosa PARACEL	Empresa PARECEL Fundación NATAN	Pai Tavytera	Mberyvo Jaguarymi	Yby Yau	Concepción	16 de diciembre 2020
Instalación de Planta de Celulosa PARACEL	Empresa PARECEL Fundación NATAN	Pai Tavytera	Guyra Ñe'engatu Amba	Bella Vista Norte	Amambay	16 de diciembre 2020
Instalación de Planta de Celulosa PARACEL	Empresa PARECEL Fundación NATAN	Mbya Guarani	Vy'a Renda Boquerón	Paso Barreto	Concepción	17 de diciembre 2020
Instalación de Planta de Celulosa PARACEL	Empresa PARECEL Fundación NATAN	Pai Tavytera	Jeguahaty	Paso Barreto	Concepción	17 de diciembre 2021
Instalación de Planta de Celulosa PARACEL	Empresa PARECEL Fundación NATAN	Pai Tavytera	Takarendiju	Paso Barreto	Concepción	18 de diciembre 2020
Instalación de Planta de Celulosa PARACEL	Empresa PARECEL Fundación NATAN	Mbya Guarani	Takuarita	Sgto. José Félix López	Concepción	18 de diciembre 2020
Instalación de Planta de Celulosa PARACEL	Empresa PARECEL Fundación NATAN	Sanapana, Enxet, Qom, Toba Maskoy y otros	Redención	Concepción	concepción	18 de diciembre 2020

Annex 4. Response from the MADES on EIA requests for the Parcel Project



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Mizomokha
Ministerio del
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Dirección de Transparencia y Anticorrupción - Oficina de Acceso a la Información

Solicitud Nro: 58741

Peticionante : Alejandro Bonzi

Domicilio: Celsa Speratti 3865 de la Ciudad de Asunción Departamento Central

Email: sunucoordinacionejecutiva@gmail.com

Respuesta Vía: mail

Descripción de la Solicitud:

Me gustaría acceder a los estudios de impacto ambiental (EIA) que PARACEL realizó en comunidades indígenas Pai Tavytera del departamento de Amambay.

Respuesta:

El Ministerio del Ambiente y Desarrollo Sostenible a través de la Dirección Gral. de Control de la Calidad Ambiental y de los Recursos Naturales informa: (Memorándum DVP N°1162/2022) que según base de datos obrante en la DGCCARN, a nombre de la firma PARACEL S.A. se halla registro de:

Declaración DGCCARN N° 636/2022

Declaración DGCCARN N° 983/2020

Declaración DGCCARN N° 962/2020

Declaración DGCCARN N° 893/2020

Declaración DGCCARN N° 742/2022

Declaración DGCCARN N° 916/2020

Declaración DGCCARN N° 930/2020

Declaración DGCCARN N° 894/2020

Declaración DGCCARN N° 1003/2020

Declaración DGCCARN N° 1163/2020

Declaración DGCCARN N° 118/2021

Declaración DGCCARN N° 1129/2020

Declaración DGCCARN N° 1823/2021

Declaración DGCCARN N° 1026/2020

Declaración DGCCARN N° 127/2021

Declaración DGCCARN N° 140/2021

Declaración DGCCARN N° 1710/2021

Declaración DGCCARN N° 625/2022

Declaración DGCCARN N° 749/2022

Registro PGAG - FORESTAL N° 016/2021

Resolución DGCCARN A.A. N° 1357/2022

Asimismo, se pone a conocimiento del recurrente, que las informaciones relacionadas a





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proyectos aprobados y rechazados en el marco de la Ley N° 294/93 De Evaluación de Impacto Ambiental y sus reglamentaciones, se encuentran disponibles en la página web institucional www.mades.gov.py. DIA SIAM.

En el mismo sentido, se informa que se encuentran actualmente en Análisis Técnico 17 (diecisiete) expedientes correspondientes a la firma PARACEL S.A.

Estando a su disposición para lo que estime necesario, atentame



Abog. Esc. Amelia S. Ramírez, Directora
Oficina de Acceso a la Información
Dirección de Transparencia y Anticorrupción

Annex 5. Field Trip Photos



1. Meeting with leaders of indigenous organizations.



2. Interview in the Cerro Akangue community.



3. Interview in the Arroyo Ka'a community.



4. Interview in the Pāi Reta Chirupoty – Sati community.



5. Interview in the Ita Jeguaka community.



6. Interview in the Guyra Ñe'engatu Amba community.



7. Delivery of groceries to people interviewed in the Ita Jeguaka community, the groceries were shared after the interview.