

Indigenous Peoples Planning Framework (IPPF)

Project/programme title:	RACINE/FODECC Initiative: Climate-Resilient Agriculture, Investment, Nature and Equity
Country	Cameroon
Accredited entity:	Ministry of Economy, Planning and Regional Development (MINEPAT)

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Acronyms and abbreviations

ABS	Access and Benefit-Sharing (Nagoya Protocol)
ACHPR	African Commission on Human and Peoples' Rights
AE	Accredited Entity
BUNEC	Bureau National de l'État Civil (National Civil Registration Office)
CAFI	Central African Forest Initiative
CBD	Convention on Biological Diversity
CED	Centre pour l'Environnement et le Développement (Centre for Environment and Development)
CEDAW	Committee on the Elimination of Discrimination against Women
CERD	Committee on the Elimination of Racial Discrimination
CESCR	Committee on Economic, Social and Cultural Rights
CISPAV	Comité de Suivi des Programmes et Projets Impliquant les Populations Autochtones Vulnérables (Inter-sectoral Committee for Monitoring Programmes and Projects Involving Vulnerable Indigenous Populations)
GRM	Grievance Redress Mechanism
CTFC	Centre Technique de la Forêt Communale
DFP	Domaine Forestier Permanent (Permanent Forest Domain)
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standards (GCF)
EU	European Union
EUDR	EU Deforestation Regulation (Regulation (EU) 2023/1115)
FODECC	Fonds de Développement des Filières Cacao et Café (Cocoa and Coffee Sector Development Fund)
FP	Funding Proposal
FPIC	Free, Prior and Informed Consent
GAP	Gender Action Plan
GCF	Green Climate Fund
IE	Implementing Entity
IFAD	International Fund for Agricultural Development
IIED	International Institute for Environment and Development
ILO	International Labour Organization
IP	Indigenous Peoples
IPDP	Indigenous Peoples Development Plan
IPP	Indigenous Peoples Plan
IPPF	Indigenous Peoples Planning Framework
IRM	Independent Redress Mechanism (GCF)
ISO	International Organization for Standardization
IWGIA	International Work Group for Indigenous Affairs
MBOSCUA	Mbororo Social and Cultural Development Association (Association pour le développement social et culturel des Mbororo au Cameroun)
MINAC	Ministère des Arts et de la Culture (Ministry of Arts and Culture)
MINADER	Ministère de l'Agriculture et du Développement Rural (Ministry of Agriculture and Rural Development)
MINAS	Ministère des Affaires Sociales (Ministry of Social Affairs)
MINEPAT	Ministère de l'Économie, de la Planification et de l'Aménagement du Territoire (Ministry of Economy, Planning and Regional Development)
MINEPDED	Ministère de l'Environnement, de la Protection de la Nature et du Développement Durable (Ministry of Environment, Protection of Nature and Sustainable Development)
MoU	Memorandum of Understanding
MRV	Monitoring, Reporting and Verification
NGO	Non-Governmental Organisation

OKANI	Baka indigenous peoples organisation (proper name, not an acronym)
PLADDT	Plan Local d'Affectation des Terres au Développement Durable et à la Transition Agroécologique (Local Land Use Plan for Sustainable Development and Agroecological Transition)
PNDP	Programme National de Développement Participatif (National Participatory Development Programme)
PNDPA	Plan National de Développement des Peuples Autochtones (National Plan for the Development of Indigenous Peoples)
RACINE	Resilient Agriculture for Climate, Investment, Nature and Equity
RACOPY	Réseau Recherche Actions Concertées Pygmées (Research Network for Planned Pygmy Actions)
REDD+	Reducing Emissions from Deforestation and Forest Degradation
UN	United Nations
UNDP	United Nations Development Programme
UNDRIP	United Nations Declaration on the Rights of Indigenous Peoples
UNOPS	United Nations Office for Project Services
UPIN	Unique Personal Identification Number
WWF	World Wide Fund for Nature

1. Introduction and purpose

This Indigenous Peoples Planning Framework (IPPF) has been prepared by the Ministry of Economy, Planning and Regional Development (MINEPAT) for the RACINE/FODECC Initiative (Resilient Agriculture for Climate, Investment, Nature and Equity), a six-year project financed by the Green Climate Fund (GCF) and the Central African Forest Initiative (CAFI) in Cameroon.

The IPPF has been prepared in accordance with:

- The GCF Indigenous Peoples Policy (2018), paragraphs 36-39, which require accredited entities to prepare an IPPF where specific project activities or locations have not yet been determined and where there are potential impacts on indigenous peoples;
- The GCF Operational Guidelines on the Indigenous Peoples Policy (2019), paragraphs 23-27, which specify the content of the IPPF and the process for developing site-specific Indigenous Peoples Plans (IPPs); and
- The GCF Environmental and Social Policy (2022) and associated Environmental and Social Standards (ESS), in particular ESS 7 (Indigenous Peoples).

The overall objective of this IPPF is, as required by GCF IP Policy paragraph 10: (a) to ensure that indigenous peoples present in or with collective attachment to areas where RACINE project activities will be implemented are not harmed by the project; and (b) to ensure that they have access to project benefits in a culturally appropriate manner.

The IPPF is a framework document. Because RACINE is a programmatic, national-scale project whose specific beneficiary municipalities will be identified progressively during implementation through FODECC's digital registration system and the PLADDT process, it is not possible to determine at appraisal exactly where project activities will interact with indigenous peoples' communities or territories.

Although the likelihood of direct risks to indigenous peoples were initially identified as low, and being addressed by measures outlined in the ESMP, an IPPF was prepared as a precautionary measure, given the scale at which the project will operate. The IPPF therefore establishes the process by which this interaction will be assessed and managed as specific locations are confirmed, and the conditions under which site-specific Indigenous Peoples Plans (IPPs) will be prepared.

This IPPF should be read alongside the RACINE Environmental and Social Management Plan (ESMP), in which Risk 10 addresses indigenous peoples' rights and access specifically.

2. Project description

RACINE aims to reduce deforestation and greenhouse gas emissions linked to cocoa and coffee production in Cameroon, while improving the climate resilience of smallholder farms. The project is financed by GCF (EUR 87 million: EUR 78.3 million concessional loan and EUR 8.7 million grant) and CAFI, with a total financing envelope of EUR 214.38 million and a six-year implementation period. MINEPAT is the Accredited Entity and Executing Entity for Component 1; FODECC is the Executing Entity for Component 2.

Project components relevant to this IPPF:

- Component 1: Policy and institutional environment: Strengthening inter-ministerial coordination, national traceability systems aligned with the EU Deforestation Regulation (EUDR),

and participatory land use planning (PLADDT) in rural municipalities. PLADDT preparation missions may interact with areas used by indigenous peoples.

- Component 2: Financial incentives: Scaling up FODECC's digital subsidy platform through three windows: the Producers' Window (performance-based subsidies for individual smallholders); the Agroecological Window; and the Communities Window (co-financing for municipalities and cooperatives for post-harvest infrastructure and green investments, including construction of 180 post-harvest processing centres). The processing centres involve small-scale civil works.

Monitoring, reporting and verification (MRV) is cross-cutting, led by FODECC with UNDP technical advice and UNOPS procurement support. It includes a robust MRV system integrated into FODECC's digital platform, annual independent verifications (ISO 14000) triggering results-based payments from CAFI, and scientific impact monitoring.

Geographic scope:

The project operates across Cameroon's eight cocoa and coffee producing regions. The Baka, Bagyéli and Bakola forest peoples (the main indigenous groups in Cameroon) are concentrated in the East and South regions, both of which fall within the project's geographic scope. The Mbororo transhumant herders are present across multiple regions.

Beneficiary municipalities will be identified progressively during implementation. As a result, the extent and nature of project interactions with indigenous peoples' communities cannot be fully determined at appraisal. This is the primary reason for preparing an IPPF rather than a site-specific IPP.

3. Legal and regulatory framework

3.1 International framework

Cameroon has not ratified ILO Convention No. 169 on Indigenous and Tribal Peoples. However, Cameroon is a signatory to the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP, 2007) and the African Charter on Human and Peoples' Rights, under which the African Commission on Human and Peoples' Rights has recognised the rights of indigenous communities in Cameroon. The following international instruments are relevant:

Instrument	Relevance to RACINE
UNDRIP (2007)	Sets out the rights of indigenous peoples including rights to land, territories, resources, culture, identity, self-determination and FPIC. Not legally binding but represents the normative framework.
African Charter on Human and Peoples' Rights	Article 22 recognises the right of all peoples to their economic, social and cultural development. The African Commission has applied this to indigenous communities including the Baka and Bagyéli.
ILO Convention No. 169 (not ratified by Cameroon)	Sets out rights of indigenous and tribal peoples including consultation and FPIC, land rights and labour protections. Not legally binding in Cameroon but informs GCF requirements.
Paris Agreement (2015)	Recognises the rights of indigenous peoples in the context of climate action and the importance of traditional knowledge.
GCF Indigenous Peoples Policy (2018)	Applies in full to GCF-financed activities. Requires preparation of an IPPF where specific locations are not yet determined.
GCF Environmental and Social Policy (2022) - ESS 7	Triggered by the presence of Baka, Bagyéli, Bakola and Mbororo communities in project regions.

UN Committee on Economic, Social and Cultural Rights - Concluding Observations on Cameroon (E/C.12/CMR/CO/4, 2019)	Expressed concern about allegations that working conditions faced by indigenous peoples are tantamount to forced labour. Directly relevant to the labour risk in ESMP Risk 10 and to the mitigation measures in this IPPF.
African Commission on Human and Peoples' Rights - Concluding Observations on Cameroon (2010)	Found no legislative or regulatory measures to protect indigenous populations and recommended that Cameroon harmonise national legislation with regional and international standards on IP rights. Directly relevant to the governance and political representation gap addressed in this IPPF

3.2 National legal framework

Cameroon does not have a dedicated law on indigenous peoples. The following national instruments are relevant to this IPPF.

Constitutional and civil rights framework

- Constitution of Cameroon (1996, revised from 1972): The preamble states that "the State shall ensure the protection of minorities and shall preserve the rights of indigenous populations in accordance with the law." No implementing legislation has been adopted.¹
- Law No. 2024/016 of 23 December 2024 (Civil Registration): Replaces the 1981 civil registration law. Introduces digital certificates, a Unique Personal Identification Number (UPIN) and a 90-day birth registration window (previously 60 days). Approximately 7 million Cameroonians currently lack a birth certificate. The 12th session of CISPAV (30 July 2024) recommended referring the issue of identity cards to the General Delegation for National Security (GDNS) to establish mechanisms addressing this gap for indigenous populations.²

Environmental and resource governance

- Law No. 96/12 of 5 August 1996 (Framework Law on Environmental Management): Establishes the principle of participation of all populations in environmental management decisions.
- Law No. 94/01 of 20 January 1994 (Forestry Law): Defines the Permanent Forest Domain (DFP) and provides limited rights for local populations to use forest products for personal use, subject to restriction on public interest grounds. Provides for community forests (management rights only, not ownership).
- Law No. 2021/014 of 9 July 2021 (Access to Genetic Resources and Traditional Knowledge): Internalises the Convention on Biological Diversity and the Nagoya Protocol on Access and Benefit-Sharing (ABS). Regulates access to Cameroon's genetic resources, their derivatives and associated traditional knowledge, and provides for fair and equitable benefit-sharing in favour of indigenous and local communities. Implementing decree: Decree No. 2023/07526/PM of 6 October 2023.

Land tenure

- Ordinance No. 74/1 of 6 June 1974 (Land Tenure), as amended: The foundational land tenure law. Protects registered land and "effectively developed" customary land. Land used for hunting, gathering and seasonal activity is not protected.

Labour

- Labour Code (Law No. 92/007 of 14 August 1992): Prohibits forced labour and sets minimum standards for working conditions. Applies to IP labourers on cocoa and coffee plantations.

¹ CED et al., 2013

² IWGIA, 2025

- Decree No. 17 of 27 May 1969: Establishes categories of hazardous work prohibited for minors.

Procurement and construction

- Decree No. 2018/366 of 20 June 2018 (Public Procurement Code): Applies to civil works, studies and supplies financed by public funds, including post-harvest processing centres under Activity 2.1.2.1.

Institutional framework for indigenous peoples

- CISPAV (Comité de Suivi des Programmes et Projets Impliquant les Populations Autochtones Vulnérables): The Inter-sectoral Committee for Monitoring Programs and Projects Involving Vulnerable Indigenous Populations, established 2013 under MINAS. Holds annual sessions. Coordinates government ministries, NGOs and IP representatives around the National Plan for the Development of Indigenous Peoples (PNDPA). RACINE should register its IP-related activities with CISPAV.
- Act No. 2022/5074/PM of 4 July 2022: Transferred responsibility for social and environmental safeguard monitoring on large infrastructure projects from MINEPDED (Ministry of Environment) to the Department of Social Affairs (MINAS), which is also the ministry responsible for indigenous peoples. This creates a coordination interface relevant to RACINE's ESMP and IPPF implementation.
- MINEPAT Methodological Guide for PLADDT Preparation (2022): Sets out the participatory procedure for local land use planning. IP communities must be included in PLADDT consultations in areas where they are present.

3.3 Gap analysis

The gap between Cameroonian law and GCF requirements is wider than the absence of FPIC legislation alone. Four structural gaps are particularly relevant to RACINE.

1. **No dedicated legal recognition of indigenous peoples' rights.** Cameroon's Constitution protects indigenous peoples in name only: no implementing legislation has been adopted, and the term "indigenous" was interpreted in parliamentary debate as meaning any native of an area, which would render IP-specific protections void.³ Multiple treaty bodies⁴ have recommended adoption of a dedicated IP law, none exists as of 2026. This means all protections for Baka, Bagyéli, Bakola and Mbororo peoples depend on generalised environmental and labour laws that do not address their specific situation.
2. **IP ancestral territories have no legal protection.** Ordinance 74/1 (1974) classifies land used for hunting and gathering as "free of any effective occupation", meaning it is automatically state property subject to concession. Because IP communities cannot demonstrate "effective development" in the agricultural sense required by the law, their ancestral territories have no formal legal protection and can be legally transferred to third parties without consent or compensation. The Special Rapporteur on the Right to Food documented this in his 2012 mission to Cameroon: "communities that depend for their living on shifting agriculture or hunting or gathering are not sufficiently protected... This explains why the groups concerned, namely the Mbororo and the Pygmies, face relentless encroachment on the land on which they depend for their livelihood."⁵

³ CED et al., 2013

⁴ ACHPR 2010, CERD 2010, CESCR 2012

⁵ De Schutter, O., 2012

The community forest mechanism under the Forestry Law does not remedy this gap in practice. Obtaining a community forest requires formation of a legal entity with demonstrated organisational capacity, which most Baka and Bagyéli communities lack. The 5,000 hectare maximum is inadequate for communities whose nomadic subsistence activities cover far larger areas. And in mixed Bantu-IP community forests where these barriers have been overcome, experience shows that IP members are routinely excluded from consultations and that the 10% of Annual Forestry Fees allocated to communities rarely reaches them.⁶ Land law reform has been under discussion since 2011 and as of 2024 there is still no clear roadmap.⁷

In the absence of legislative progress, CED has piloted an interim approach⁸: recognising indigenous territories as traditional chieftaincies (a formal administrative unit under Cameroonian law) giving the chieftaincy formal responsibility and decision-making power over a defined territory. On 26 February 2021, the first Baka traditional chief was installed in Assok village in Cameroon's South Region, with support from APIFED, WWF Cameroon and Rainforest Foundation UK.⁹ This provides a degree of practical recognition but is not a substitute for legal land rights.

- 3. No FPIC framework in national law.** No Cameroonian legislation provides for FPIC. The Forestry Law requires "consultation" of communities before logging concessions, but this falls well short of consent, communities cannot refuse a project, only comment on its implementation.¹⁰ The PLADDT guide requires IP inclusion in consultations, but does not require agreement or specify any consequence for non-compliance. GCF ESS 7 and the GCF IP Policy require FPIC under specific circumstances (see Section 6.3), and there is no national law to implement or enforce this.
- 4. Exclusion from administrative and political systems.** IP communities have no formal political representation in cooperatives, municipalities or regional councils. Without identity documents, IP individuals cannot open bank accounts, vote, access subsidy systems, or file formal complaints. The PNDP assessment¹¹ found that not a single Baka served as a civil servant or council member. IWGIA's most recent country reports confirm this has not changed materially.¹² The 2024 Civil Registration Law (Law No. 2024/016) could help if implementation reaches the most marginalised communities. MINEPAT and FODECC should engage with MINAS and CISPAV to maximise this opportunity.

4. Indigenous Peoples in Cameroon and the project area

4.1 Identification of indigenous peoples

Three main groups of indigenous peoples are recognised in Cameroon and are relevant to this IPPF:

Forest peoples: Baka, Bagyéli, Bakola and Bedzang

Three subgroups of forest peoples are present in Cameroon. The Baka are estimated at approximately 40,000 individuals, living primarily in the East and South regions. The Bagyéli and Bakola are estimated at approximately 4,000 individuals, concentrated in approximately 12,000 km² of southern Cameroon, particularly in the districts of Akom II, Bipindi, Kribi and Lolodorf. A much smaller group, the Bedzang,

⁶ CED et al., 2013; IWGIA and IFAD, 2022

⁷ LandCam, 2024

⁸ LandCam, 2024

⁹ WWF Cameroon/APIFED, February 2021

¹⁰ CED et al., 2013

¹¹ Schmidt-Soltan, 2003

¹² IWGIA, 2023; 2024; 2025

number approximately 300 individuals in the central region, northwest of Mbam in the Ngambè-Tikar area. Together, forest peoples represent approximately 0.4% of Cameroon's total population.¹³

All four subgroups meet the GCF IP Policy's four criteria for indigenous peoples under paragraph 14: self-identification as distinct peoples; collective attachment to forest territories; distinct cultural, economic and social systems; and distinct languages.

The sedentarisation of Baka, Bagyéli and Bakola communities is an ongoing and accelerating process driven by forest loss, protected area creation, logging concessions and agricultural expansion, not a completed historical transition. Estimates by 2021 by FAO documented that 81% of Baka food still derives from hunting, gathering and fishing, indicating that forest access remains central to physical survival even as permanent forest camps have become rare¹⁴. Most Baka and Bagyéli now maintain semi-permanent settlements near farming villages while continuing to rely on forest territories for food, medicine and cultural practice. The loss of those territories is therefore an active and documented harm. They have adopted some subsistence farming practices but retain strong forest-based livelihoods and cultural practices. Despite being formally equal citizens under the Cameroonian constitution, these groups face profound structural exclusion. A 2003 assessment by MINEPAT for the World Bank's PNDP programme found that not a single Baka or Kola served as a civil servant, none was a member of any of the country's councils, and almost none held a national identity card. IWGIA's most recent country reports¹⁵ confirm that formal political representation and access to justice remain low. The absence of identity documents compounds every other barrier: without an ID card, a producer cannot open a bank account, access a subsidy system, vote, or file a complaint.¹⁶

Their participation in the formal cocoa and coffee sector as independent registered producers is currently very limited. Where they do participate, it is predominantly as casual labourers on Bantu-owned plantations rather than as landowners or registered producers¹⁷. Indigenous women face compounded discrimination: Bagyéli women consulted by the signatory organisations of the joint 2013 ACHPR report described being treated as inferior by both Bantu men and neighbouring communities, and identified the impossibility of inheriting land as a major structural problem.¹⁸

Mbororo transhumant herders

The Mbororo (Fulani) are estimated at over one million people, representing approximately 12% of Cameroon's population, significantly larger than the forest peoples groups and not a marginal presence. Three subgroups are found in Cameroon: the Wodaabe in the Northern Region; the Jafun, who live primarily in the North-West, West, Adamawa and East regions; and the Galegi (Aku). The Jafun and Aku are traditionally transhumant, moving herds between wet-season and dry-season camps along established livestock corridors (*pistes à bétail*). These corridors and dry-season pastures in coffee-producing municipalities are directly vulnerable to formalisation of land allocations through the PLADDT process, with encroachment by settled farmers on transhumance routes, often occurring without reference to traditional authorities, has been identified as a driver of Mbororo land insecurity across Cameroon, and is documented in the West and North-West coffee-producing regions specifically¹⁹. This makes Mbororo engagement in PLADDT processes not merely good practice but a specific conflict-prevention requirement.

¹³ IWGIA, 2023; 2024; 2025

¹⁴ FAO/Alliance of Bioversity International and CIAT, 2021, cited in IWGIA/IFAD 2022

¹⁵ IWGIA, 2023; 2024; 2025

¹⁶ Schmidt-Soltan, 2003, Forest Peoples Programme, 2025

¹⁷ CED/Fern, 2026

¹⁸ CED et al., 2013).

¹⁹ IWGIA and IFAD, 2022, MBOSCUA research cited in CED et al., 2013

The Jafun are directly relevant to RACINE as they are present in the West and North-West regions, Cameroon's principal Arabica coffee areas. Their transhumance routes may intersect with PLADDT land use planning processes in coffee-producing municipalities. Access to formal systems is severely limited: in Mandjou, Mbororo constitute 95% of the total population of 20,000 but only 5 of 25 municipal representatives are Mbororo²⁰. Only 50% of Mbororo girls attend primary school; 10% reach secondary level and 1% university²¹, indicating that standard digital or text-based outreach will be ineffective. The IP baseline study (see section 7) will confirm the extent of Mbororo presence in specific beneficiary municipalities and assess interactions with project activities.

Sacred forests and cultural heritage in the project area

The West region (Cameroon's principal Arabica coffee production zone) is home to a well-documented network of sacred forests with profound cultural, spiritual and ecological significance. These forests, managed under traditional chieftaincy governance systems, serve as sites for ancestor communication, ritual ceremonies, medicinal plant harvesting, drinking water sources and biodiversity conservation. Recent research on the sacred forests of Bafou, Baleveng and Bamendou in Menoua Division (West region) documented 54 plant species and carbon stocks of up to 443.9 t C/ha, confirming their ecological as well as cultural value²². Traditional laws protecting these forests are under growing pressure from agricultural expansion, generational change and the invasion of exotic plant species.

While these sacred forests are not the territory of the Baka, Bagyéli or Bakola forest peoples, they constitute cultural heritage of the communities living in coffee-producing municipalities and are relevant under GCF ESS 8 (Cultural Heritage) and GCF IP Policy paragraph 63, which requires priority to be given to avoiding impacts on natural areas with cultural or spiritual value. FODECC will need to ensure that PLADDT preparation missions in the West region explicitly map and flag sacred forest sites, and that no agroforestry investment or civil works activity is proposed in or immediately adjacent to a recognised sacred forest without prior consultation with the relevant chieftaincy.

4.2 Preliminary assessment of IP presence in project areas

Given the programmatic nature of RACINE, the full extent of project interactions with IP communities cannot be determined at appraisal. The following preliminary assessment is based on available information at the national level:

Region	IP presence	Project interaction
South	Baka, Bakola, Bagyéli	Major cocoa zone. PLADDT preparation may interact with IP customary land use (forest areas, hunting territories). Beneficiary registration of IP smallholders possible.
East	Baka	Cocoa production zone with significant Baka presence. PLADDT and beneficiary registration may interact with IP communities. Proximity to Lobeke National Park MoU areas.
Centre	Baka: limited; Bedzang: present (Ngambè-Tikar area)	Major cocoa zone. Limited Baka presence in some municipalities. Bedzang in Tikar plain, outside main cocoa belt but should be confirmed in baseline study.
South-West	Limited forest peoples presence	Largest cocoa zone (45-50% national output). Limited IP forest peoples presence. Low forest-peoples risk; Mbororo presence to be confirmed.

²⁰ CED et al., 2013

²¹ MBOSCUA data, cited in CED et al., 2013

²² Tiokeng et al., 2024

West	Mbororo Jafun: moderate; Sacred forests: significant (ESS 8)	Principal Arabica coffee zone. Jafun Mbororo present in transhumance. Network of sacred forests documented in Menoua, Ndé, Haut-Nkam divisions, relevant to ESS 8. PLADDT and civil works require sacred forest mapping.
North-West	Mbororo Jafun: moderate	Arabica coffee zone also affected by anglophone crisis. Mbororo Jafun present. Security risk assessments required before field operations (see ESMP Conflict Sensitivity Note).
Littoral	Mbororo: limited	Some coffee production. Mbororo presence limited; baseline study to confirm.

5. Assessment of potential impacts on Indigenous Peoples

5.1 Overarching finding: no direct negative impacts expected

RACINE operates through a voluntary, demand-driven digital subsidy platform. No project activity involves land acquisition, physical or economic displacement, restriction of access to resources, or the imposition of obligations on any community. Participation by any producer (including IP producers) is entirely voluntary. The project's core mechanism actively prevents harm to forest ecosystems on which IP communities depend, by automatically blocking subsidies for plots within the Permanent Forest Domain and discouraging further deforestation.

IP communities participate in the formal cocoa and coffee sector as independent registered producers only marginally, and no project activities are directed at or specifically affect IP communities or their territories. As of 2025, approximately 320,000 producers (representing some 14% of Cameroon's agricultural population) are registered in FODECC's digital system. IP participation within this registered producer base is currently negligible. The project therefore interacts with IPs primarily through the risk of their exclusion from benefits rather than through any direct harm to their lands, livelihoods or cultural practices.

This IPPF has been prepared at the explicit request of the GCF as a precautionary measure. The IPPF provides a more structured framework for IP engagement than the ESMP alone, and will serve as a useful instrument for managing any IP interactions that arise during implementation.

FPIC requirements under GCF IP Policy paragraphs 58–64 are not triggered by RACINE's standard activities, which do not involve land acquisition, physical displacement, or the direct commercial exploitation of IP cultural heritage. However, as identified in the risk assessment in Section 5.2, specific activities during implementation (particularly PLADDT land use planning and civil works) could in certain circumstances trigger FPIC requirements if they result in restriction of IP access to forest territories, or if they significantly affect cultural heritage sites. The circumstances in which FPIC will be required are set out in detail in Section 6.3.

5.2 Potential social and environmental risks and adverse impacts

Risk	Significance	Notes
Exclusion of IP producers from FODECC benefits due to banking, documentation or digital registration barriers	Moderate	The FODECC system requires bank accounts, smartphone registration, and co-financing contributions. IP producers (particularly the Baka) typically lack identity cards, have no bank accounts, and have very limited smartphone access. Without targeted support, systematic exclusion is the default outcome.

Labour exploitation: IP individuals working as labourers on FODECC-supported plantations under poor conditions	Moderate-High	The most substantively documented IP risk in the project area. A January 2026 joint study by CED and Fern ²³ across ten localities in the Centre, South and East regions found that Baka women are specifically confined to low-paid labour on third-party plantations with little or no income control and high exposure to violence. Women performing a major share of cocoa work receive only 20-30% of income. The UN CESCR (2019), in its Concluding Observations on Cameroon (E/C.12/CMR/CO/4, para 36), expressed concern about allegations that substandard working conditions to which members of indigenous peoples are subjected are tantamount to forced labour.
Land use conflicts during PLADDT processes in areas with IP customary land use	Low-Moderate	PLADDT activities involve land use mapping and formalisation of boundaries. Where IP communities use forest areas for hunting, gathering or seasonal camps, there is a risk that formalisation of land allocations could affect customary use. In the West region, sacred forests may be mapped but not adequately protected from adjacent agricultural expansion incentivised by FODECC subsidies. Where PLADDT processes result in formalisation of land allocations that restrict or extinguish IP access to forest areas traditionally used for hunting, gathering, seasonal activity or cultural practice, FPIC will be required before those allocations are finalised (see Section 6.3).
Cultural heritage: sacred forests in the West (coffee) region affected by project-associated agricultural intensification	Low-Moderate	Sacred forests in coffee-producing municipalities of the West region (e.g. Menoua, Ndé divisions) are under increasing pressure from agricultural expansion. FODECC subsidies for agroforestry and intensification could indirectly accelerate this pressure if not managed (Tiokeng et al., 2024). Where FODECC-supported activities would have a significant adverse impact on a recognised sacred forest or cultural heritage site, FPIC with the relevant chieftaincy authority will be required before those activities proceed (see Section 6.3).
Limited IP participation in decision-making bodies governing the project	Low	IP communities are under-represented in cooperatives, municipalities and regional governance structures. The PNDP IPDP (2003) documented that not a single Baka or Kola was a member of any Cameroonian council; this has not changed materially since.
Agricultural intensification incentivised by FODECC subsidies driving encroachment on IP forest territories	Low-Moderate	FODECC subsidies incentivise expansion and intensification of cocoa/coffee production. IP ancestral lands used for hunting and gathering have no legal protection under Ordinance 74/1 - they are classified as state land subject to concession. In areas where Baka communities live adjacent to cocoa farms, subsidised intensification could accelerate encroachment on forest territories used by IPs. De Schutter (2012) warned explicitly that 'development projects such as forest exploitation and large-scale plantations will further marginalise the Pygmies, instead of improving their situation' if protective measures are absent. RACINE's anti-deforestation geofencing (DFP exclusion) mitigates this partially, but does not cover all forest areas used by IPs.

²³ CED and Fern, 2026

The labour exploitation risk warrants particular attention. The CED/Fern (2026) study (which is the most current evidence base, conducted specifically in RACINE's primary intervention regions) identifies Baka women as facing compounded marginalisation: as women, as indigenous people, and as labourers rather than landowners. This places them at the bottom of the social and economic hierarchy in the cocoa sector, with virtually no leverage over their working conditions or income. These findings are consistent with documentation of Baka working conditions, and with the UN CESCR's 2019 concern about allegations that working conditions for indigenous peoples are tantamount to forced labour. The risk rating of Moderate-High reflects the severity of the pre-existing condition and the project's potential to inadvertently reinforce it if supported farms are not subject to enforceable labour standards.

5.3 Positive impacts and opportunities

The project presents genuine opportunities for indigenous peoples. A note of caution from the CED/Fern (2026) study is however directly relevant: EUDR traceability requirements (geolocation of plots, proof of legal land use, risk management obligations) could actually increase pressure on the most vulnerable actors in the cocoa sector, particularly women with limited access to land documents and information, if not accompanied by targeted support measures. The authors explicitly warn that without such measures, these rules could harm rather than help marginalised women. This caution applies with equal force to FODECC's registration system, which carries similar plot geolocation and documentation requirements. RACINE's design deliberately does not require formal land title for registration, which partially mitigates this risk, but only if the facilitated registration and outreach measures set out in this IPPF (Section 8.1) are effectively implemented for IP producers. The CED/Fern study's own recommendations, securing women's land rights, improving access to training, strengthening women's representation in cooperatives, align directly with these IPPF measures and with the RACINE Gender Action Plan.

Additional opportunities include:

- Access to subsidies: IP landowners and labourers-turned-producers can access FODECC subsidies on the same basis as other smallholders, with income improvement potential.
- Agroforestry and traditional knowledge: The agroforestry components (Activity 2.1.4.1 and Sustainability Window) can incorporate traditional ecological knowledge from forest peoples on forest species, ecosystem management and sustainable harvesting.
- Sacred forest protection: The project's anti-deforestation mechanisms and agroforestry promotion, if well-targeted, can reduce agricultural pressure on sacred forests in the West region, reinforcing rather than undermining traditional conservation governance.
- Land tenure documentation: PLADDT processes and FODECC georeferencing can document IP customary land use and sacred site locations, contributing to longer-term tenure security and cultural heritage protection.
- Financial inclusion: Facilitated bank account opening for IP producers contributes to financial inclusion and provides a formal channel for income that is harder to misappropriate than cash.

6. Engagement and consultation process

6.1 Consultation during project preparation

No structured, IP-specific consultations were conducted with Baka, Bagyéli, Bakola or Mbororo communities during project preparation. General stakeholder consultations were conducted with farmer organisations, cooperatives, municipalities and government agencies across the cocoa and coffee producing regions. The AE acknowledges this as a gap and commits to remedying it through the IP baseline study and the engagement process set out in this IPPF.

6.2 Consultation principles

All engagement with indigenous peoples under this IPPF and any IPP prepared pursuant to it will comply with the following principles, consistent with GCF IP Policy Section 7.1.5 and Operational Guidelines paragraphs 13-19:

- Free: Consultations will be free of external manipulation, interference, coercion and intimidation.
- Prior: Consultations will begin before any project activity that may affect IP communities commences, providing sufficient time for community decision-making processes.
- Informed: All relevant information will be disclosed in accessible formats, in relevant local languages (including Baka, Bagyéli and other IP languages where feasible), and in a manner that is understandable to IP communities.
- Culturally appropriate: Consultation processes will respect the customs, norms and values of affected communities and will engage traditional governance structures (councils of elders, village leaders) as well as IP women and youth
- Ongoing: Engagement will continue throughout the project lifecycle, not only at preparation.

6.3 When FPIC is required and how it will be documented

FPIC under GCF IP Policy Section 7.2 is not required for RACINE's standard activities, as the project does not involve land acquisition, displacement or restriction of IP access to resources. However, FPIC will be required in the following specific circumstances should they arise during implementation:

- If any PLADDT land use planning process in a municipality with significant IP presence proposes to formalise land allocations that would restrict, extinguish or limit IP customary land use or access to forest areas traditionally used for hunting, gathering, seasonal activity or cultural practice.
- If any post-harvest processing centre (Activity 2.1.2.1) is proposed for construction on or immediately adjacent to an area with known IP cultural or spiritual significance, or where such construction would significantly affect a recognised sacred forest.
- **If any other project activity would significantly affect IP cultural heritage, whether through direct physical impact, restriction of access to heritage sites, or commercial use of IP traditional knowledge.**

When any of the following trigger conditions is identified, FODECC or MINEPAT will initiate the **FPIC procedure set out in Appendix 1** before proceeding with the relevant activity.

6.4 Engagement with IP representative organisations

FODECC will engage the following organisations with established relationships with IP communities in Cameroon to support consultation, outreach and monitoring activities. Prior to finalisation of this IPPF, MINEPAT has initiated outreach to IP representative organisations operating in Cameroon's cocoa and coffee producing regions, including those partnering with GCF, to share the IPPF and Funding Proposal and to seek feedback on the proposed IP engagement approach. The table below lists the organisations with which formal partnership agreements will be established during Year 1.

- CED (Centre pour l'Environnement et le Développement): Works on forest peoples' rights, customary land and REDD+ in Cameroon. Has conducted field work in Baka and Bagyéli communities across the South and East regions, and co-produced the 2026 study on women in the cocoa sector.
- OKANI: A local, indigenous NGO run by Baka people, working to ensure the rights of indigenous peoples. Directly linked to community governance structures. Based in Bertoua, active in the East region.
- RACOPY (Réseau Recherches Actions Concertées Pygmées): National network of organisations working with Baka, Bagyéli, Bakola and Bedzang peoples. Members based in the East, Centre and South regions. Established 1996.
- MBOSCUA (Mbororo Social and Cultural Development Association): Works to strengthen Mbororo capacities for fair and sustainable development and protects their economic and social rights. Based in Bamenda, covering North-West and West regions, directly relevant to coffee-producing areas.

Engagement with these organisations will begin with the IP baseline study (Year 1) and continue throughout the project. FODECC will formalise partnerships with at least two of these organisations through collaboration agreements before the end of Year 1.

7. IP baseline study

FODECC will commission an IP baseline study in Year 1 of project implementation. This study is the cornerstone of this IPPF and will provide the evidence base for all subsequent IP engagement, benefit-sharing and monitoring activities. It will be conducted in partnership with at least one IP representative organisation (CED, OKANI or RACOPY) and in consultation with affected communities.

7.1 Scope of the study

The study will address the following:

1. Mapping of IP presence: identification and mapping of Baka, Bagyéli, Bakola, Bedzang and Mbororo (Jafun) communities in or adjacent to project beneficiary municipalities, with particular focus on the East, South and Centre regions (forest peoples) and the West and North-West regions (Jafun Mbororo).
2. Current participation in the cocoa and coffee sector: assessment of the extent to which IP community members currently participate in the formal sector as landowners, registered producers, labourers or cooperative members. Drawing on the CED/Fern (2026) findings as a baseline, the study will provide disaggregated data on women, men and youth, including Baka women's specific situation.
3. Labour conditions: documentation of the nature and extent of IP individuals' employment as agricultural labourers on cocoa and coffee plantations, including wages, working conditions, incidence of forced or exploitative practices, access to grievance mechanisms, and whether payment in kind is occurring. The study should assess compliance with the Labour Code and verify the severity of the forced labour risk flagged by the UN CESCR (2019).
4. Access barriers: assessment of specific barriers facing IP producers in accessing the FODECC subsidy system, with particular focus on identity card access, banking requirements, digital registration, language, co-financing obligations and documentation. The study should assess the proportion of IP adults who hold identity cards and bank accounts.
5. Land tenure and sacred sites: mapping of IP customary land use and forest territories in municipalities where PLADDT processes are planned. In the West region specifically, mapping of sacred forests in beneficiary municipalities to inform ESS 8 compliance and PLADDT preparation.

6. Consultation outcomes: structured, culturally appropriate consultations with IP communities and, in the West region, with chieftaincy authorities responsible for sacred forests, on the project, their needs and priorities, and their views on the measures proposed in this IPPF. Findings to be documented and shared for community validation.
7. Opportunities: Assessment of specific opportunities for IP communities to benefit from the project.

7.2 Outputs and timeline

Output	Timeline	Responsibility
Study Terms of Reference developed and published	Month 3	FODECC
Partnerships formalised with IP representative organisations	Month 6	FODECC / MINEPAT
Field consultations and data collection completed	Month 9	Study team + IP organisations
Draft study report circulated to IP communities for validation	Month 11	FODECC E&S Specialist
Final study report submitted to MINEPAT and GCF	Month 12	FODECC E&S Specialist
Study findings integrated into revised IPPF/IPP as appropriate	Month 15	MINEPAT

8. Avoidance, mitigation and benefit-sharing measures

8.1 Measures applicable throughout project implementation

Access and inclusion

- ➔ FODECC's registration system will not require formal land title as a condition of eligibility. Producers are required only to declare that they cultivate the plot and commit to deforestation-free production. This is critical for IP women and men who hold customary but not formal title.
- ➔ Targeted outreach sessions will be conducted in IP communities in the East and South regions by FODECC in partnership with CED, OKANI and RACOPY, using culturally appropriate formats and IP languages. Sessions will explain FODECC eligibility criteria and the registration process.
- ➔ Facilitated registration support will be provided to IP producers: MINADER field staff and partner NGO representatives will offer direct assistance with plot georeferencing and bank account opening.
- ➔ IP producers who register will have equal access to FODECC's agricultural advisory services and agroecological transition support. Training content will, where appropriate, incorporate traditional ecological knowledge on forest species and agroforestry practices.

Labour conditions

- ➔ All producer agreements under the FODECC Guichet system will include a clause prohibiting exploitative labour practices, including those affecting IP labourers (see Exclusion List, ESMP Annex 3).
- ➔ Agricultural advisors will be trained to identify potential cases of IP labour exploitation during farm visits and to report these to the FODECC E&S Specialist through the digital monitoring platform.

- ➔ The GRM (ESMP Chapter 5) provides a dedicated channel for IP labourers and community members to raise grievances related to working conditions.

PLADDT and land use planning

- ➔ In municipalities where IP communities are identified as present or with collective attachment, MINEPAT will ensure that the PLADDT process explicitly maps customary land use, including forest areas used for hunting, gathering and seasonal activities.
- ➔ No land allocations will be formalised in PLADDT plans in areas with IP customary use without prior consultation with affected communities and, where required by this IPPF, FPIC.
- ➔ PLADDT preparation missions in areas with significant IP presence will include a community facilitator from an IP representative organisation.

Agroforestry and traditional knowledge

- ➔ The agroecological window and the shade tree components of the producers' window will explore how traditional ecological knowledge of IP communities on forest species, ecological relationships and sustainable resource management can inform the selection of agroforestry species and system design.
- ➔ Any use of IP traditional knowledge in project communications, training materials or technical documents will be subject to prior consultation with the knowledge holders and will not involve commercial use without FPIC.

8.2 Conditions triggering preparation of a site-specific IPP

In accordance with GCF IP Policy paragraph 38 and Operational Guidelines paragraphs 23-27, a site-specific IPP will be prepared whenever:

1. A PLADDT process is being prepared in a municipality where the IP baseline study (or other evidence) identifies significant IP presence or customary land use that may be affected by land allocation decisions;
2. A post-harvest processing centre (Activity 2.1.2.1) is proposed for a location within or immediately adjacent to an area of known IP cultural, spiritual or customary significance;
3. Any other project activity is identified during implementation as likely to have a significant interaction (positive or negative) with an IP community that is not adequately covered by the general measures in this IPPF.

IPPF and IPP trigger decision tree

The following decision tree guides MINEPAT and FODECC in determining whether a site-specific IPP is required for any given project activity:

1. Is the activity taking place in a municipality where IP communities are present or have collective attachment (as identified by the IP baseline study or other evidence)?
2. Does the activity involve any of the following: (a) land use allocation decisions affecting IP customary use; (b) construction in or adjacent to IP cultural/spiritual sites; (c) commercial use of IP traditional knowledge; or (d) other significant IP interactions not covered by IPPF general measures?
3. Does the activity require FPIC (i.e., does it restrict IP access to resources, involve land acquisition, affect cultural heritage, or require relocation)?

8.3 Content of site-specific IPPs

Site-specific IPPs (if required) prepared under this IPPF will include, as a minimum, the elements required by GCF IP Policy paragraph 39:

- Baseline information on the affected IP community (drawn from the study and any additional field assessment);
- Key findings on site-specific impacts, risks and opportunities;
- Measures to avoid, minimise and mitigate negative impacts, and enhance positive impacts;
- Results of consultations, including a list of participants, dates, responsible parties, and (where applicable) evidence of FPIC;
- Gender assessment and targeted measures for IP women;
- Benefit-sharing arrangements specific to the site;
- Tenure arrangements and how customary land use has been recognised;
- Site-specific grievance redress arrangements;
- Costs, budgets, timetables and institutional responsibilities; and
- Monitoring, evaluation and reporting indicators.

IPPs will be prepared by relevant executing entities in consultation with affected IP communities and reviewed and approved by MINEPAT before the relevant activity commences. IPPs will be disclosed in accordance with Section 11 of this IPPF.

9. Grievance Redress Mechanism

RACINE's four-level Complaints Management Mechanism (CMM), described in Chapter 5 of the ESMP, applies to all project-affected persons, including indigenous peoples. In accordance with GCF IP Policy Section 7.3, the following additional provisions apply specifically to IP communities:

- **Accessibility:** The GRM is accessible through mobile application, paper form, telephone and in-person at the town hall. In IP communities with limited digital literacy or mobile phone access, community facilitators from IP representative organisations may serve as GRM intermediaries, receiving complaints on behalf of community members and submitting them to the FODECC E&S Specialist.
- **Language:** Complaints may be submitted in French, English or local languages. FODECC will arrange interpretation/translation where needed, including for IP languages.
- **Confidentiality:** Complainants' identities can be kept confidential if requested, particularly where a complainant fears retaliation.
- **No cost:** The GRM is available at no cost to affected persons.
- **Culturally appropriate processes:** Where appropriate and agreed with the affected community, grievances may also be addressed through traditional or customary dispute resolution processes, supplementary to the GRM.
- **Response time:** The FODECC E&S Specialist will acknowledge all IP-related complaints within five working days and provide a substantive response within 30 working days.
- **Escalation:** Unresolved complaints can be escalated to MINEPAT (GRM Level 4) and, if still unresolved, to the GCF Independent Redress Mechanism (IRM).

For clarity, these arrangements form part of a three-level architecture: the project-level Grievance Redress Mechanism operated by FODECC (the four tiers described above, including the COPIL); the institutional Grievance Redress Mechanism of MINEPAT as Accredited Entity, with investigations by the General Inspectorate (IGEFS) and sanctions through the CELCOR/SEAH Unit; and the Independent Redress Mechanism (IRM) of the Green Climate Fund. An affected indigenous person or community may bring a grievance to the Accredited Entity level or directly to the GCF IRM, without exhausting the lower levels. Complaints relating to sexual exploitation, abuse and harassment follow the dedicated, survivor-centred pathway, with response triggered within 72 hours.

The detailed operation of this mechanism is set out in the project-level Grievance Redress Mechanism and in the consolidated MINEPAT SEAH grievance mechanism, annexed to the ESMP. For consistency with the Funding Proposal and its annexes, the Grievance Redress Mechanism (GRM) referred to in this chapter is the project's Grievance Redress Mechanism (GRM); the two terms are equivalent.

The GRM will be communicated to IP communities as part of the targeted outreach process (Section 8.1). Community facilitators will be trained to explain the GRM and assist IP community members in using it. The number and nature of IP-related complaints will be tracked and reported in half-yearly E&S monitoring reports.

10. Institutional arrangements

Actor	IPPF responsibilities
MINEPAT (AE)	Strategic oversight of IPPF implementation; review and approval of IPPs; inclusion of IP data in annual E&S reports to GCF; ensuring IPPF requirements are reflected in subsidiary agreements with FODECC; point of escalation for unresolved IP complaints.
FODECC E&S Specialist (Component 2)	Day-to-day IPPF implementation for Component 2 activities; commissioning and managing the IP baseline study; coordinating with IP representative organisations; ensuring outreach and facilitated registration for IP producers; managing GRM for IP-related complaints; preparing and implementing IPPs for Component 2 activities; preparing IP sections of half-yearly E&S monitoring reports.
MINEPAT (Component 1)	Ensuring IPPF requirements are applied to PLADDT activities and MRV field operations; identifying IP interactions in field operations; notifying FODECC/MINEPAT immediately if FPIC-triggering circumstances arise; preparing IPPs for Component 1 if required.
Agricultural advisors / CTFC	Identifying potential IP interactions during farm visits; reporting on IP participation in FODECC system; flagging potential labour exploitation of IP workers; supporting GRM at field level.
IP representative organisations (tbc CED, OKANI, RACOPY, MBOSCUDA)	Supporting IP baseline study; conducting culturally appropriate outreach and registration assistance in IP communities; serving as GRM intermediaries; supporting FPIC processes where required; providing feedback on IPPF and IPP implementation.

11. Monitoring, evaluation and reporting

11.1 Indicators

Indicator	Baseline (Year 1)	Target	Frequency
Number of IP producers registered in FODECC system (disaggregated by gender)	To be set by baseline study	Increase year-on-year	Annual

Number of IP outreach sessions conducted	0	≥4 per year in Years 2-6	Annual
Number of IP-related complaints received and resolved through GRM	0	100% resolved within 30 working days	Half-yearly
Number of IPPs prepared	0	As required by trigger conditions	As needed
IP baseline study completed and shared with communities	Not completed	Completed by Month 12	One-off
Producer agreements including IP labour clause in force	0	100% of agreements	Annual
PLADDT processes in IP areas including customary land use mapping	0	100% of PLADDT in IP areas	As PLADDT conducted

11.2 Reporting

- FODECC E&S Specialist will include an IP section in every half-yearly E&S monitoring report to MINEPAT.
- MINEPAT will include IP progress data in every annual E&S report to the GCF.
- The IP baseline study report will be shared with the GCF as an annex to the first project progress report (no later than Month 15).
- Any IPP prepared during implementation will be submitted to the GCF for review before the relevant activity commences.
- A mid-term review of this IPPF will be conducted at Year 3, drawing on IP baseline study findings and implementation experience, and shared with GCF.

12. Budget

The following indicative budget covers the dedicated IP-specific activities under this IPPF. Costs for general project activities that have an IP dimension (agricultural advisory services, PLADDT preparation, GRM) are embedded in the project's main operational budget.

Activity	Indicative cost (EUR)	Year(s)	Funding source
IP baseline study (consultancy, field work, translation, community validation)	30,000-40,000	Year 1	GCF grant
Targeted IP outreach sessions (facilitation, materials, travel)	10,000 per year	Years 1-6	GCF grant
Facilitated registration support for IP producers	5,000 per year	Years 2-6	GCF grant
FPIC processes and IPP preparation (if triggered)	15,000-30,000 per IPP	As needed	GCF grant
Mid-term IPPF review	Embedded in FODECC gender and inclusion unit operating costs	Year 3	GCF grant
FODECC E&S Specialist	Embedded in ESMP budget	Years 1-6	GCF grant

Costs for FPIC processes and IPP preparation are indicative only and will be determined based on baseline study findings and actual trigger conditions. If multiple IPPs are required, the AE will request additional GCF resources through the project change request procedure.

13. Disclosure

This IPPF will be disclosed in accordance with the GCF Information Disclosure Policy and GCF IP Policy:

- The IPPF will be published on MINEPAT's website and on the GCF project page prior to project approval.
- A summary of the IPPF will be translated into French and, where feasible, into relevant IP languages or accessible oral formats for IP communities in the East and South regions
- Summaries will be shared with IP representative organisations (CED, OKANI, RACOPY) for dissemination to affected communities.
- Any IPP prepared under this IPPF will be disclosed to the affected community and on the GCF project page before the relevant activity commences.
- Communities will be provided sufficient time to review and provide feedback on disclosed documents before activities affecting them commence.

Appendix 1 - FPIC Procedure

1. Purpose and scope

This annex sets out the procedure for conducting and documenting Free, Prior and Informed Consent (FPIC) processes under the RACINE IPPF, in accordance with the GCF Indigenous Peoples Policy (2018) and Operational Guidelines (2019), Section 3.3. It applies whenever any of the trigger conditions set out in Section 6.3 of this IPPF are identified during project implementation.

FPIC is both a process and an outcome. The process requires good faith engagement with affected IP communities, based on adequate information, free from coercion, and conducted before any activity affecting them commences. The outcome requires documented evidence of agreement, or of a decision to withhold consent. MINEPAT and FODECC are required to document both.

2. Step-by-step FPIC procedure

Step 1: Trigger identification and suspension

The field officer, agricultural advisor, PLADDT facilitator or CTFC agent who identifies a potential FPIC trigger submits a written trigger notification to the FODECC E&S Specialist (Component 2) or MINEPAT E&S team (Component 1). The relevant activity is suspended immediately pending completion of the FPIC process. A suspension notice is communicated to all field staff and contractors involved.

The FODECC E&S Specialist confirms whether the trigger conditions are met within five working days, in consultation with the IP baseline study findings and the IP representative organisation most active in the area.

Step 2: Community identification and representative mapping

Working with the relevant IP representative organisation (CED, OKANI, RACOPY or MBOSCUDA as appropriate), the FODECC E&S Specialist identifies:

- Which specific IP community or communities are affected
- The community's own governance and decision-making structures (council of elders, village chief, women's association, etc.)
- The customary process by which the community makes collective decisions affecting land and resources
- The community's preferred language(s) for communication
- Whether a community-appointed facilitator or interpreter is needed

The IP representative organisation confirms the appropriate entry point for engagement. No direct contact with the community is made by FODECC or MINEPAT staff before this mapping is complete.

Documentation required: community identification note; confirmation from IP representative organisation.

Step 3: Information disclosure

All information relevant to the proposed activity is disclosed to the community in a format and language that is accessible and understandable. For Baka, Bagyéli, Bakola or Mbororo communities with low literacy rates, this requires oral presentation facilitated by the IP representative organisation, not written documents alone.

Information disclosed must include:

- The nature, purpose and location of the proposed activity
- The expected duration and reversibility of any impacts
- Potential positive and negative impacts on the community's lands, resources, livelihoods and cultural practices
- The proposed mitigation measures and any benefit-sharing arrangements
- The community's rights under this IPPF, including the right to give conditional consent or to refuse consent
- The process by which the community's decision will be documented and respected
- The grievance redress mechanism available if the community has concerns about the process

Disclosure materials are shared in advance of the first consultation meeting, not at it.

Documentation required: disclosure materials (in appropriate language/format); record of distribution.

Step 4: First consultation meeting

A first meeting is held with the community, facilitated by the IP representative organisation and attended by FODECC/MINEPAT staff. The purpose of this meeting is to present information and answer questions, **not** to seek consent. The community must have adequate time for internal deliberation before a decision is requested.

The meeting must:

- Be held at a time and place convenient to the community

- Include women, youth and elders, with separate sessions for women and youth where culturally appropriate
- Be conducted in the community's language with appropriate interpretation
- Be recorded (with community permission) and summarised in written minutes shared with the community for validation

At the close of the first meeting, the community is informed of the timeline for further consultations and decision-making.

Documentation required: meeting minutes (validated by community representatives); attendance list; summary of main issues raised.

Step 5: Community deliberation period

The community is given a deliberation period of at least 30 days to discuss the proposed activity internally, using its own customary decision-making processes, without pressure from FODECC or MINEPAT. During this period:

- FODECC/MINEPAT staff do not contact the community about the proposed activity unless the community requests clarification
- Additional information or clarification may be requested by the community at any time and must be provided promptly
- A second consultation meeting may be held at the community's request

Documentation required: record of any clarification requests and responses.

Step 6: Consent meeting and decision documentation

A formal consent meeting is held at which the community communicates its decision. The decision may be:

- **Consent:** the community agrees to the proposed activity, with or without conditions. Any conditions are recorded in detail. The activity may proceed only in full compliance with those conditions.
- **Conditional consent:** the community agrees in principle subject to specific modifications to the project design or additional commitments. FODECC/MINEPAT must confirm acceptance of the conditions in writing before the activity proceeds. If conditions cannot be met, the activity is redesigned or abandoned.
- **Refusal of consent:** the community withholds consent. The activity may not proceed. FODECC or MINEPAT must redesign or abandon the activity and notify the GCF within 30 days.

The outcome is documented in a consent record that must include:

- Names and roles of community representatives present
- Date and location
- A plain-language summary of the proposed activity as presented
- The community's decision and any conditions
- Signatures or marks of community representatives (or equivalent endorsement under customary governance)
- Signatures of FODECC/MINEPAT representatives and the IP representative organisation facilitator

The consent record must be shared with the community for validation before it is finalised. A copy is provided to the community, to MINEPAT, to the GCF, and to the IP representative organisation.

Documentation required: consent record (as above); evidence of community validation.

Step 7: Reporting and disclosure (within 30 days of decision)

The FODECC E&S Specialist prepares a brief FPIC process report including:

- Summary of trigger circumstances
- Community identification and representative mapping
- Information disclosed and methods used
- Dates and participants of all consultation meetings
- Main issues raised by the community and how they were addressed
- The community's decision and any conditions
- Next steps (activity proceeds, redesign required, or activity abandoned)

The FPIC process report is submitted to MINEPAT, disclosed on the GCF project page, and included as an annex to the relevant IPP. If consent was refused, the GCF is notified separately within 30 days.

3. Special considerations for RACINE's context

- Baka, Bagyéli and Bakola communities have very low literacy rates. All disclosure materials must be prepared in oral/visual formats. Written minutes must be read back to participants and validated orally before signature.
- IP women face compounded discrimination and must be specifically included in consultations. Where cultural norms restrict mixed-gender deliberation, separate sessions for women must be held with a female facilitator.
- Consultations should not be scheduled during periods of intense agricultural activity (planting, harvesting) or forest-based activity (dry season hunting). Schedule in consultation with the community and the IP representative organisation.
- Many IP community members lack identity cards. The absence of formal identification does not disqualify a community member from participating in or representing the community in an FPIC process. Customary authority and community mandate are the relevant credentials.
- If project circumstances change materially after consent has been given — including changes in project design, location or expected impacts — the FPIC process must be revisited with the community before the activity proceeds.

Appendix 2 - key references

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