

REPSOL'S RESPONSE TO the paper "Driving ecologically unequal exchange: A global analysis of multinational corporations' role in environmental conflicts", July 2025, [Global Environmental Change](#)

About Repsol's approach to Human Rights:

At Repsol we work to build strong relationships with the communities near our operations based on respect, integrity, cultural sensitivity, accountability, transparency, good faith and non-discrimination. We follow an approach to human rights due diligence that is aligned with international best practices, promoting the participation of the communities in the impact management process to guarantee shared value in all phases of our projects.

In Latin America, protecting and showing solidarity with the indigenous communities where we operate has always been a priority for Repsol. We involve the communities from the project's earliest stages of the projects, respecting their unique nature and their human rights, especially for the most vulnerable groups of people.

We periodically evaluate the impacts of our operations on the people and the environment, and we establish action plans and implement social investment projects to promote sustainable development in the areas of our operations.

Our commitment to respect the human rights whenever we operate has been clearly reflected in the Corporate Human Rights Benchmark (CHRB) over the years. Repsol ranked first in the [Corporate Human Rights Benchmark \(CHRB\) 2023](#) among 250 companies, and it has repeatedly been ranked as the top performing company in the extractive sector, according to this benchmark based on public information. It has the highest score overall for human rights practices, and scores in the top three on remedies and grievance mechanisms as well as embedding respect and human rights due diligence.

Response to the cases listed in the Environmental Justice Atlas:

In response to the BHRRC's request for information, we would like to share the comments below.

In general terms, we would first like to comment that, looking at the details of the cases attributed to Repsol in the reference list annexed to the "Environmental Justice Atlas, we see that the case count includes 10 cases related to projects that have no connection to the company. It seems that the company is only mentioned in the descriptions in these cases because it has operations in the same country or assets near the ones mentioned or in relation to geopolitical issues that are related to energy, but in which the company is not involved.

In order to provide a full answer to the BHRRC's request for information, the cases in which Repsol is mentioned in the EJA have been analyzed, finding 23 mentions, the details of which are shown below.

Colombia:

Questions regarding Islas San Andres and Niscota

Repsol does not have any activities in Colombia since 2024, when it sold its stakes in the different assets where it was participating.

Repsol briefly held a stake in an exploration license in the Islas San Andres, but it has never operated in the area.

The Niscota case is referred to other company and Repsol contract is just mentioned as context information. Repsol relinquished its non-operating stake in the Niscota block in 2019 and has not had any relation to this block since.

Mali:

Questions regarding the Taoudeni Basin

Repsol has never had any licenses, stakes, or activities in any assets in Mali.

Algeria:

Questions related to the “gas trading”

This case is a political controversy and, as a company, Repsol has no influence in the political decision-making process related to this issue.

Repsol has been present in Algeria since 1973. It currently holds stakes in the Reggane project and in Block 405a, based on stable contracts signed with the national authorities and in close partnership with the state-owned oil and gas company Sonatrach. Repsol has approximately 100 employees in the country.

Argentina:

Questions regarding Loma de La Lata y Vaca Muerta, Laguna de Llanquanelo, and Chevron’s activities in the country.

Repsol has no licenses or stakes in assets in Argentina and has not carried out any activities in the country since 2012, when the Argentinian government expropriated the 51% of YPF owned by Repsol.

Bolivia:

Questions regarding Sierra de Aguaragüe, Pilón Lajas, Pacific LNG and Campo Margarita

1) Sierra de Aguaragüe: Repsol has never had licenses, stakes, or activities in the area of Sierra de Aguaragüe.

2) Pilón Lajas: The company has never carried out activities in the area, despite having an “Operating Contract for the Tuichi Area” in force between 1997 and 2016.

3) Pacific LNG: Repsol is part of the consortium of Pacific LNG but the company has never had a position of influence in the decision making.

4) Campo Margarita:

Over the years we have built a meaningful engagement with the communities around Campo Margarita and we recognize and respect the right of indigenous peoples to define their development priorities and their relationship with the territory, ensuring that our operations do not impact their cultural identity and autonomy.

We work with human rights due diligence to ensure the safety of our operations and minimize the impact on the environment and the neighboring communities. Guarani and other local communities participate in all the phases of the Due diligence processes along the lifecycle of our projects, including the impact identification, the action plans elaboration and the monitoring processes.

Besides, we promote community development programs designed in collaboration with the communities, prioritizing health, education, basic infrastructure development, organizational empowerment and sustainable development.

We also count on an accessible and culturally appropriate grievance mechanism that promotes dialogue and strengthens mutual trust.

For further information, please see the following links:

- ✓ Guarani community testimony regarding Repsol's operations: <https://www.business-humanrights.org/en/latest-news/pueblo-guarani-itika-guasu-orgullo-so-de-conseguir-un-convenio-de-148-millones-d%C3%B3lares-con-repsol-bolivia/>
- ✓ <https://www.lostiempos.com/actualidad/economia/20240823/campo-margarita-zona-petrolera-segura-pueblo-guarani>
- ✓ <https://www.noticiasfides.com/economia/repsol-ypf-amplia-apoyo-a-36-comunidades-de-itika-guasu-123780>
- ✓ <https://heyzine.com/flip-book/f51dac8c3e.html>
- ✓ Socio-environmental monitoring: <https://www.repsol.com/en/sustainability/sustainability-strategy/our-contribution-to-the-sdgs/repsol-sdg-success-stories/socio-environmental-monitoring/index.cshmtl>

Ecuador:

Questions regarding Yasuni National Park, la XI Ronda Petrolera, and Payamino

As part of the company's global strategy, Repsol completed its exit from Ecuador in 2022. Repsol has not had any licenses, stakes or activity in Ecuador since the company exited the country.

During the time that Repsol operated the blocks 16 and 67, from 1991 until 2022, Human Rights Due Diligence was carried out across all activities. As part of the Due Diligence carried out throughout the entire lifecycle of the operations, Friendship Agreements ("*Acuerdos de Amistad*") were maintained with the communities. These agreements are essential to ensure a relationship based on mutual respect and collaboration, thereby promoting the well-being and development of the communities within the area of influence.

Each year, the agreements established with these communities were fulfilled, receiving their feedback and approval. During the years Repsol operated in Ecuador, continuous efforts were made to maintain open and honest communication, as well as our commitment to respecting human rights.

Repsol was not awarded any licenses in the *XI Ronda Petrolera*.

Spain:

Questions regarding Tarragona and the Balearic Sea

- 1) Repsol does not operate any hydrocarbon extraction facilities since we definitively ceased production at all our assets in Spain in 2021.
- 2) Repsol's complex in Tarragona carries out strict monitoring of the environmental impact of its operations and of the entire value chain, including emissions into the atmosphere, water management, waste and soil handling, and groundwater protection, while making responsible use of resources.

The complex integrates sustainability strategies into its operational practices and manages its activities responsibly in line with Repsol's policies on sustainability, occupational health and safety, risk management, and the environment, all aligned with the company's values.

The Tarragona complex maintains ongoing dialogue with its stakeholders and responds to the concerns of the surrounding community. As part of this commitment, since 2018 air quality studies have been conducted in the Camp de Tarragona area. The observatory is a unique initiative within the European Union, responding to social demands for companies to share responsibility for the impacts of their activities, going beyond legal obligations. The Observatory is thus a tool that supports the chemical sector's aim to foster a relationship and integration with its surroundings based on transparency and shared value, while also focusing on continuous improvement toward better air quality.

Driven by this goal, in 2024 the Observatory reached its seventh edition, consolidating its role as a territorial information tool, as well as a permanent participatory platform for all local stakeholders for knowledge-sharing,

debate, and reflection. This helps enrich methodologies and conclusions and sets new challenges in a process of continuous improvement.

The technical and scientific part of the study is carried out by the Rovira i Virgili University of Tarragona and coordinated with stakeholders by the Institut Cerdà.

For more information, please refer to the following links:

- ✓ **Repsol Policies:** [Repsol policies](#)
- ✓ **Environment at the Tarragona Complex:** [Medioambiente](#)
- ✓ **Air Quality Observatory:** [Observatorio calidad del aire](#)

Perú:

Questions regarding Melchorita Gas Plant in Lima and the LNG Gas Pipeline in Ayacucho in Peru

Repsol sold its stake in Peru LNG gas plant in 2013. The project for this plant was carried out following the highest social and environmental standards at that time with strong international financing and significant participation from the Banco Interamericano de Desarrollo (BID).

Repsol sells the production from Blocks 57 to Peru LNG for export.

For more information on how we exercise due diligence in human rights in our activities in Block 57, please visit the following link: <https://www.repsol.com/en/sustainability/sustainability-strategy/our-contribution-to-the-sdgs/repsol-sdg-success-stories/sustainable-coexistence-project/index.cshmtl>

In 2005, Repsol acquired a 10% stake of the Camisea Consortium from Hunt Oil. This Consortium, in charge of operations in Lote 56 and Lote 88, is operated by Pluspetrol.

An international consulting firm specialized in businesses and human rights, Akuaipa, which seeks to promote a social and economic transformation that guarantees better performance in human rights matters, analyzed the Camisea project in 2021. The consultancy prepared a detailed analysis report on various aspects regarding Due Diligence on Human Rights

The report and more information about the Camisea project can be found in this link: <https://www.repsol.com/en/sustainability/sustainability-pillars/people/human-rights/business-relationships/camisea-project/index.cshmtl>

Questions regarding Hidrovía Amazónica, Ucayali in Peru

We are not familiar with the project mentioned as the Hidrovía Amazónica; in the event that the text refers to the impact on the Atalaya community due to river navigation resulting from the Camisea or Block 57, we would like to clarify the following:

- The communities and federations of Atalaya are part of the areas of indirect influence due to the impact on river transit. They participate in various dialogue spaces, and the Operators have voluntary social investment agreements with them.
- Both Block 57 and Camisea have had licenses to operate since the beginning of their activities over 20 years ago and comply with the highest international standards in terms of respect for communities, their territories, biodiversity, and environmental protection.

For more information on how we exercise due diligence in human rights in our activities in Block 57 and Camisea, please visit the following links:

- ✓ <https://www.repsol.com/en/sustainability/sustainability-strategy/our-contribution-to-the-sdgs/repsol-sdg-success-stories/sustainable-coexistence-project/index.cshmtl>
- ✓ <https://www.repsol.com/en/sustainability/sustainability-pillars/people/human-rights/business-relationships/camisea-project/index.cshmtl>

Question related to the Amarakaeri communal reserve and Hunt Oil in Peru

Repsol has not had any license, stake, or activity in Block 76 since 2017. Block 76, operated by Hunt Oil, had a license contract for exploration activities, which expired in August 2017. Since that date, Repsol has had no activity or participation in any project or activity in this area. During the period of exploratory activity (1 well), the project had the social license to carry out such activities.

Question related to the oil spill in Ventanilla, Peru, in 2022

According to information widely disseminated in different media outlets, citing sources from the judicial investigation, (i) the primary cause of the spill was the uncontrolled displacement of the Mare Doricum tanker, which led to damage to the underwater installations (PLEM) at the maritime terminal of the La Pampilla Refinery (RELAPASAA). This happened after a break in the lines that should have kept the ship moored during the crude unloading operation. Ensuring the mooring and safety operations of the tanker is the responsibility of the captain of the ship, according to both Peruvian and international laws; and (ii) the PLEM (pipeline end manifold) withstood the demands of the normal operation as it had done since 2013, the year of its manufacture and installation.

As part of its immediate response to the accident, and in parallel with environmental remediation and cleanup efforts, Repsol designed a Social Action Plan to remediate the negative impacts on communities caused by the spill. The Social Action Plan was developed in accordance with our human rights and community relations policy, aligned with international due diligence standards and the United Nations Guiding Principles on Business and Human Rights.

The Social Action Plan is divided into three phases: Emergency Phase, Remediation Phase, and Development Phase.

More information about the Social Action Plan in the La Pampilla Refinery and the company's human rights policy can be found here:

- ✓ <https://www.repsol.com/en/sustainability/sustainability-pillars/people/human-rights/la-pampilla-social-action-plan/index.cshhtml>
- ✓ <https://compromisorepsol.pe/>
- ✓ https://www.repsol.com/content/dam/repsol-corporate/en_gb/sostenibilidad/human-rights-repsol.pdf

Carbon credit projects:

Questions regarding RMDLT REDD Portel-Pará, Brazil; Madre de Dios Amazon REDD+ Project, Peru; and Parque Nacional Cordillera Azul (PNCAZ) REDD+ Project, Peru

Repsol has never acquired carbon credits or had any other relationship with the project RMDLT REDD Portel-Pará or any other projects in Brazil.

Regarding the mentioned projects in Peru, Repsol acquired carbon credits from the REDD+ projects in Madre de Dios and Cordillera Azul in 2020.

This purchase was guaranteed by the highest international standards available, with certification from Verra, a global reference for integrity in the voluntary carbon market at the time of purchase. Both projects were certified under the CCB (Climate, Community & Biodiversity Standard) and in both cases they were ranked as Gold level, which means that the projects were evaluated and recognized for their positive impact on biodiversity conservation, local community development, and climate change mitigation.

Subsequent to Repsol's purchase of credits, both projects have been subject to public and legal questioning. Repsol stopped purchasing credits in 2022 and has retired a total of 53,355 credits for compensation between 2020 and 2025, including 32,986 from Cordillera Azul and 20,369 from Madre de Dios.