

Independent Reporting Mechanism (IRM): Brazil Transitional Results Report 2018–2021

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I. Introduction

The Open Government Partnership is a global partnership that brings together government reformers and civil society leaders to create action plans that make governments more inclusive, responsive, and accountable. Action plan commitments may build on existing efforts, identify new steps to complete ongoing reforms, or initiate an entirely new area. OGP’s Independent Reporting Mechanism (IRM) monitors all action plans to ensure governments follow through on commitments. Civil society and government leaders use the evaluations to reflect on their progress and determine if efforts have impacted people’s lives.

The IRM has partnered with Christiana Soares de Freitas to carry out this evaluation. The IRM aims to inform ongoing dialogue around the development and implementation of future commitments. For a full description of the IRM’s methodology, please visit <https://www.opengovpartnership.org/about/independent-reporting-mechanism>.

This report covers the implementation of Brazil’s fourth action plan for 2018–2021. In 2021, the IRM started implementing a new approach to its research process and the scope of its reporting on action plans, approved by the IRM Refresh.¹ The IRM adjusted its Implementation Reports for 2018–2021 action plans to fit the transition process to the new IRM products and enable the IRM to adjust its workflow in light of the COVID-19 pandemic’s effects on OGP country processes.

¹ For more information, see “IRM Refresh,” Open Government Partnership, <https://www.opengovpartnership.org/process/accountability/about-the-irm/irm-refresh>.

II. Action Plan Implementation

The IRM Transitional Results Report assesses the status of the action plan's commitments and the results from their implementation at the end of the action plan cycle. This report does not re-visit the assessments for "Verifiability," "Relevance," or "Potential Impact." The IRM assesses those three indicators in IRM Design Reports. For more details on each indicator, please see Annex I in this report.

2.1. General highlights and results

The process of developing and implementing Brazil's fourth national action plan followed the same methodology and built upon actions initiated in the previous plan, which saw an extensive co-creation between the government and civil society at various stages and processes. The collaborative efforts resulted in defining 11 commitments focused on increasing access to information, enhancing transparency in government processes, and strengthening public accountability.

The implementation of the fourth action plan faced several obstacles. The government underwent various political and administrative changes, which led to alterations in the structures of responsible agencies and limited civic participation. Internal uncertainties related to the appointment of officials and the designation of focal points hindered the execution of nearly all commitments as initially planned. Additionally, misalignment between the cycles of the federal government and OGP action plan posed obstacles and delays to the implementation of certain commitments, such as open government at the state and municipal levels, as well as climate and land transparency.

The COVID-19 pandemic posed significant challenges especially in terms of conducting meetings for action plan implementation. Federal, state, district, and municipal government agencies needed to reorient political and budgetary agendas to prioritize emergency public health policies and actions. Civil society also had to implement numerous adjustments to their administrative structures and priority agendas. Regardless, commitments' implementation continued while adapting to the changing circumstances and challenges brought on by political and health safety-related factors.

Despite these shortcomings, stakeholders were able to complete most milestones. Commitments 2, 3, 5, 7, 10, and 11 were fully implemented, while Commitments 1 and 6 recorded a substantial level of implementation. Commitments 4, 8, and 9 were only partially implemented.

The plan led to improvements in access to information, civic participation, and public accountability, which are positive outcomes. Commitment 1 disseminated open government best practices by engaging with subnational actors. Commitment 2 presented a Reference Model for Open Data Disclosure. Commitment 3 advanced open science as a nascent field in the governmental agenda, leading to public disclosure of scientific data and the establishment of open repositories.

Commitment 5 successfully integrated a mechanism for user feedback in transportation services via a larger public service improvement initiative developed by Comptroller-General of the Union (CGU), the [User's Councils](#). Commitment 6 is helping inform and empower social control by those affected by the Mariana Dam disaster. Commitment 7 had the participation of subnational legislative actors as a conscious effort to increase other public bodies' participation in the OGP process. Furthermore, it has allowed citizens to track and monitor bills' progress in the National Congress, Chamber of Deputies, and the Federal Senate. Commitment 10 improved the National Water Resources Information System (SNIRH) through a participatory process that truly considered the suggestions of various actors. Commitment 11 had a measurable impact on increasing compliance with the Access to Information Law at the subnational level and created a platform, [Fala.BR](#) which serves as a reference in open government practices.

Moreover, the fourth action plan had an active component of knowledge sharing, awareness-raising, and capacity building (specifically Commitments 1, 2, 3, 4, 6, 7, 10, and 11). This resulted in more than 21 training actions, including courses, workshops, instructional videos, and training sessions that had the direct participation of more than 50,000 people, as well as the creation of manuals and reference materials readily available.¹ While the in-person activities were severely limited by COVID-19, the participants of the Plan were able to navigate these obstacles.

However, not all commitments resulted in transformative change as challenges remained in achieving broader and more significant outcomes. Beyond the political context and COVID-19 pandemic, some commitments lacked concrete and tangible results, pursued less ambitious goals, were more activity-based, their milestones lacked specificity, or their potential impact depends on effective adoption. Commitments 1 and 2 disseminated open government best practices at all levels of government but lacked an active component in implementing and adopting such practices. While there has been a reported increase in federal and subnational transparency,² this result can be attributable to other actions within the plan (e.g., Commitment 11) and outside the plan. Commitments 5, 6, and 10 developed or improved existing portals that increase access to information and social monitoring. Nevertheless, the impact of these practices will be more tangible in the future and dependent on citizens and civil society actively using these tools. The commitments with limited implementation (4, 8, and 9) did not have enough evidence to assess early results.

Among the noteworthy commitments highlighted in the IRM Design Report (3, 6, 8, and 11), Commitment 6 achieved minor results. The development of the [Renova Transparency Portal](#) successfully disclosed information on the Mariana Dam disaster reparation process.³ By 2021, BRL 19.6 billion reais (approximately USD 3.7 billion) were accounted for in the portal. Nevertheless, within the IRM evaluation period, the portal was less successful in strengthening public accountability measures through active public participation in monitoring and evaluating the progress of the reparation efforts. Commitment 8 on land transparency was affected by the overall political context on land tenure rights and the various normative instruments being introduced to reduce political participation and public oversight. Furthermore, the milestones that were reported as completed focused more on completing activities (e.g., meetings, documents with demands) than actually improving the land management system.

Commitments 3 and 11 achieved major results. Commitment 3, related to the development of open science, made scientific production data available and enabled greater public oversight of scientific information. Commitment 11 increased transparency and access to information at state and municipal levels. These successful commitments benefited from a set of milestones that were more focused and ambitious and active participation and collaboration from stakeholders. Commitment 7, while not highlighted in the Design Report, achieved a major impact as initially expected. This commitment advanced mechanisms of transparency and social monitoring of the legislative process. However, it lacked a structured and active form of civil participation both in its design and implementation.

To further enhance open government in Brazil, it is crucial to address the gaps in transparency, accountability, and citizen engagement. This may require moving from knowledge sharing and dissemination to more active adoption and operationalization of best practices. Additionally, the political context and normative changes limited civic participation, which should be a priority to correct in future plans, especially in areas that have been eroded, such as climate and land tenure. Moreover, many of the commitments developed online portals and tools that need to have an ongoing component of capacity building and citizen engagement. A model to follow is the [Time Brazil Program](#), which actively trains and provides resources to public managers and citizens and accompanies the Fala.Br platform of Commitment 11.

2.2. COVID 19 pandemic impact on implementation

The COVID-19 pandemic had various impacts on the implementation of commitments in the fourth action plan. For instance, the planning of actions under Commitment 1 had to be modified in terms of schedule and scope, therefore generating new demands for the involved actors. Under Commitment 2, the coordinating stakeholder stated that the results could have been more extensive if not for constraints related to the pandemic, such as difficulties in organizing dissemination activities. Similarly, commitments 6 and 7 dissemination and training activities of transparency and social control mechanisms were limited or canceled, diminishing the overall impact of the commitment. In contrast, the implementation of preprint repositories (Scientific Electronic Library Online and Emerging Research Information) under Milestone 6 of Commitment 3 played a crucial role in rapidly disseminating research findings related to the COVID-19 pandemic.

¹ Comptroller-General of the Union, pre-publication comments. 20 March 2024. The reported number was validated as realistic by the IRM review of each commitment with a training action component. Moreover, many of the training actions were conducted online which tends to facilitate larger dissemination.

² “Painel Monitoramento de Dados Abertos,” [Open Data Monitoring Dashboard], Comptroller-General of the Union, <https://centralpaineis.cgu.gov.br/visualizar/dadosabertos>; “CGU divulga resultado da 2ª edição da Escala Brasil Transparente - Avaliação 360°,” [CGU publishes results of the 2nd edition of the Transparent Brazil Scale - 360° Assessment], Comptroller-General of the Union, 15 March 2021, <https://www.gov.br/cgu/pt-br/assuntos/noticias/2021/03/cgu-divulga-resultado-da-2a-edicao-da-escala-brasil-transparente-avaliacao-360deg>; Comptroller-General of the Union, pre-publication comments, 5 April 2024.

³ The linked portal is the actual version. Evaluation was done based on the portal's 2021 version. See Commitment 6 for more information.

2.3. Early results

The IRM acknowledges that results may not be visible within the two-year time frame of the action plan and that at least a substantial level of completion is required to assess early results. For the purpose of the Transitional Results Report, the IRM will use the “**Did it Open Government?**” (DIOG) indicator to highlight early results based on the changes to government practice in areas relevant to OGP values. Moving forward, new IRM Results Report will not continue using DIOG as an indicator.

Section 2.3 focuses on outcomes from the implementation of commitments that had an ambitious or strong design, per the IRM Design Report assessment or that may have lacked clarity and/or ambition but had successful implementation with “major” or “outstanding” changes to government practice.¹ Commitments considered for analysis in this section had at least a “substantial” level of implementation, as assessed by the IRM in Section 2.4. While this section provides the analysis of the IRM’s findings for the commitments that meet the criteria described above, Section 2.4 includes an overview of the level of completion for all the commitments in the action plan.

Commitment 3: Innovation and open government in science	
<p>Aim of the commitment</p>	<p>This commitment is aimed at propelling the utilization of open data and fostering open data practices in scientific research. It is intended to bolster governmental support for open science, ensure the transparency of data produced by Brazilian researchers, advocate for the dissemination of open-source outcomes resulting from scientific innovation, and enhance the transparency of government’s research investment.</p> <p>Despite a significant portion of scientific research in Brazil being funded by government institutions, scientific findings (including raw data sets and materials) remain largely inaccessible. Initiatives set out in this commitment can reduce the resistance of the scientific institutions towards the practices and values of the open science movement.</p> <p>This commitment introduced the theme of Open Science to Brazil’s OGP process and garnered significant interest from various government and civil society stakeholders. In a context where open science practices and policies were still in their early stages, the commitment significantly sought to transform the scientific landscape by pursuing multiple outcomes that promote transparency and public accountability within the scientific production domain. Given its novelty and potential, the commitment was assessed as noteworthy in the IRM Design Report.</p>
<p>Did it open government? Major</p>	<p>This commitment was completed with major results. Its outcomes brought about notable transformations in the realm of open science policies in Brazil. It enabled collaboration to foster a culture of transparency and accountability in scientific production by ensuring the public disclosure of scientific data.</p> <p>The goals of the commitment were accomplished. It promoted open government and increased the transparency of research production and data usage (particularly in terms of data reuse). This can be verified by examining the most notable results of Milestones 1, 3, 4, 5, 6, 7, and 9.</p> <p>Milestone 1 established an inter-institutional network for open science within the scope of the Research Data Alliance (RDA).² Milestone 3 created a guiding document that incorporated pertinent guidelines and principles for the formulation of institutional policies in support of open science.³ This guiding document is intended to be used by other actors, so it is expected to yield tangible and effective results in the future.</p>

The implementation of this commitment led to increased institutionalization of open science practices in Brazil. An example of this can be seen in one of the leading institutions in science and technology, Fiocruz, where each unit of the organization has established working groups dedicated to open science discussions.⁴

Milestone 4 aimed to disseminate information to generate awareness, participation, and capacity building on open science and its importance among the public and relevant stakeholders. A series of six videos titled “Commitment for Open Science” had recorded 4,688 views as of October 2021.⁵ The videos were available on YouTube and institutional channels of participating organizations such as RNP, the Brazilian Institute for Information on Science and Technology (IBICT), and the National Council for Scientific and Technological Development (CNPq). The video series sensitizes citizens on the open science movement, management of open data, open science perspectives and experiences of different stakeholders, and technological interoperability.⁶ An open science free online course was also created and made available.⁷ Several key actions were carried out under Milestone 5, including (1) signing a cooperation agreement with CNPq for the development and implementation of the ‘Lattes Data’ research repository;⁸ (2) engaging with funding agencies and global institutions (such as ‘DataCite’), and (3) acquiring digital object identifiers (DOIs) to be assigned to research datasets.⁹ The National Consortium for Open Science (CoNCienciA) was subsequently established to obtain DOIs for research datasets.¹⁰

This outcome is directly relevant to Milestone 7, which is aimed at the implementation of a pilot federated infrastructure of research data repositories. Four organizations succeeded in doing so: Embrapa, Fiocruz, RNP, and the National Nuclear Energy Commission (CNEN).¹¹

Under Milestone 6, two digital books¹² were published alongside two preprint repositories: Scientific Electronic Library Online (SciELO)¹³ and Emerging Research Information (EmeRI)¹⁴ were implemented. These repositories played a crucial role in rapidly disseminating research findings related to the COVID-19 pandemic.¹⁵

Through Milestone 9, a set of indicators to assess the level of maturity of science and technology institutions in terms of research data openness was developed. The indicators were organized into categories such as governance, organizational culture, research data management, and technological infrastructure.¹⁶ Some organizations that have already made use of the set of indicators included the Federal University of Ceará (UFC), the Federal University of Goiás (UFG), and the Center of Physical Research (CBPF).

A researcher at the Executive Directorate of Research and Innovation of Embrapa stated that the successful implementation of the commitment was due to the fact that its milestones were accomplished with a collaborative, bottom-up approach between scientists from various organizations.¹⁷ The commitment was led by the scientists themselves, which ensured an agenda of activities that were less vulnerable to the political context. Similar observation was also noted by a representative of the Open Knowledge Brasil during the process of constructing and implementing the fourth action plan.¹⁸

Implementation activities also allowed for the diffusion of the concept of open science, leading governmental institutions to adopt open science practices.¹⁹ The Embrapa representative noted that “OGP provided a collaborative environment for the discussion” that brought the topic of open science into the government agenda, particularly within the Ministry of Science, Technology, and

	<p>Innovation (MCTI), who established a dedicated working group on the subject to meet regularly and address relevant matters.²⁰</p> <p>An Open Knowledge Brasil representative stated that the commitment has changed scientific culture,²¹ especially in the assessment processes of open data maturity and the establishment of interoperability standards. Having monitored the implementation of action plans in Brazil since the first one, the Open Knowledge Brasil representative asserted that this is the most successful OGP commitment to date.²² Together, this progress represents a positive change in the landscape of knowledge production in Brazil. Furthermore, the commitment helped bridge the gap between what is produced by science and what is being used and incorporated into practices.²³ As such, the commitment contributed to the ongoing process of planning and implementing more scientific solutions that address problems identified by the public.</p> <p>Embrapa representatives mentioned some necessary future actions, including the certification of existing repositories, improving the evaluation mechanisms of open science with the support of the Agency for Support and Evaluation of Higher Education (CAPES) and CNPq, and enhancing the culture of data sharing, management, and quality improvement. The absence of a national monitoring system by federal organizations, such as the MCTI, is also underlined as a gap in the implementation of evaluation instruments and assessment of institutional maturity level with regard to open science practices.</p> <p>Commitment 3 benefited from objectives that were more focused on implementing measurable and verifiable activities. This level of maturity distinguishes it from other commitments in the current and previous action plans. Going forward, the IRM recommends deepening the scope of existing activities, such as the establishment of permanent open scientific data repositories and funding policies that support open science actions, as well as implementing a national level monitoring mechanism of indicators for open research data maturity. Furthermore, greater transparency of scientific funding could encourage the federal government to establish and enable legal and political frameworks that promote accountability among public officials.</p>
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Commitment 6: Transparency and public oversight over Mariana’s reparation process and other municipalities in the region

<p>Aim of the commitment</p>	<p>This commitment was developed to bring attention to the environmental disaster of 2015 in the State of Minas Gerais, where one of the worst environmental catastrophes in Brazil’s history occurred after a collapsed mining dam near the city of Mariana led to a torrent of sludge that claimed 19 lives, buried entire villages, and has caused significant material, cultural, health, and ecological damages.²⁴ In the aftermath, it was reported that there was insufficient communication and disclosure of the damages.²⁵ Additionally, the lack of public oversight and self-auditing by the mining industry eroded opportunities for prevention and exacerbated the risk of the Mariana disaster.²⁶</p> <p>This lack of efficient communication, participation, and public oversight was considered also present over the Mariana reparation process by the commitment stakeholders.²⁷ Considering the urgency of ensuring that affected individuals are adequately informed about the reparation process, the IRM assessed this commitment as noteworthy in the Design Report. It aimed to promote transparency, public oversight, and access to information regarding</p>
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	<p>the reparation process, not only in the case of Mariana but also in other municipalities in the region that were affected by the dam rupture.</p>
<p>Did it open government? Marginal</p>	<p>This commitment recorded substantial implementation but generated only marginal results. The most significant outcomes were associated with milestones 1, 2 and 3 which sought to identify information of interest to the affected population, launch a transparency portal, and disseminate its existence.²⁸</p> <p>Under Milestone 2, collaborative efforts involving Clínica de Direitos Humanos, Universidade Federal de Minas Gerais, and the Comptroller-General of the Union (CGU) led to the creation of the Renova Transparency Portal in July 2019, which uses accessible language and discloses data in open format.²⁹ The transparency portal is quite comprehensive. It provides several pieces of information regarding reparation efforts following the disaster.³⁰ The government self-evaluation report noted that a survey was conducted to ensure that the portal provides relevant information in line with public demands, adhering to milestone 1.³¹ The 2021 version of the platform included information on the number of affected individuals, information on reparation claims and emergency aid, and financial resources spent in the reparation process.³² By 2021, the portal had accounted for BRL19.6 billion (approximately USD3.7 billion).³³ This level of transparency has been highlighted by CGU as an important and unprecedented step in a non-governmental operated portal.³⁴</p> <p>Several activities documented in the Renova Foundation Portal show the alignment of the reparation process with OGP values, including the establishment of social dialogue channels with the affected communities, civic monitoring and audits of funds, creation of informational resources about claims and available aid, and construction of budget transparency tools.³⁵ However, goals related to the training and empowerment of public managers and citizens impacted by the disaster, which are essential for the commitment to effectively influence the government and make it more open, were not fully achieved.</p> <p>The self-evaluation report indicated that Milestones 5, 6, and 7, aimed at the promotion of training on transparency, access to information, and social monitoring for managers, technicians, and citizens in the affected states and municipalities, were only partially achieved (50%).³⁶ A course on the legal normative to be followed in contingency plans for risks of dam operations was developed, and a workshop for municipal and state agents in the Rio Doce region and members of existing projects to study and understand the Emergency Action Plan for the elaboration of the contingency plan was conducted.³⁷ Overall, the training methodology and materials were developed but not sufficiently implemented, given the limitations of COVID-19 in-person activities and the target audience's lack of digital infrastructure.³⁸</p> <p>While the commitment was successful in terms of disclosing information and developing transparency mechanisms, it did not deliver its objective of strengthening public accountability measures. To do so, stakeholders need to focus on initiatives that enable public participation in monitoring and evaluating the progress of reparation efforts, as well as explicit mechanisms to hold responsible parties accountable for their actions or lack thereof. This could potentially include more engagement with local communities, effective training programs for public servants, and creating channels for public input and feedback. Nevertheless, the IRM continues to see a transformative potential in the activities for this commitment and encourages further dissemination and training to convert the transparency portal into an effective social monitoring</p>

	<p>tool. Furthermore, in September 2020, the Dam Safety Law was reformulated to have a stronger component of transparency, social participation, and control in the implementation of public and private security and emergency plans.³⁹ The successful application of this law holds promise to further advance the commitment.</p>
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Commitment 7: Transparency in the legislative process	
<p>Aim of the commitment</p>	<p>This commitment aimed to enhance the transparency of the legislative process by improving the presentation of data and information on the progress of legislative proposals. This would enable citizens and civil society organizations to monitor and participate in the activities of the Legislative Branch better. Furthermore, it pursues a conscious effort to increase state and local level participation of public bodies in the OGP national process⁴⁰ by including them as commitment actors.⁴¹</p>
<p>Did it open government? Major</p>	<p>This commitment generated major early results, with its seven milestones being fully completed. Under Milestone 1, the development of a glossary of legislative terms gathered vocabularies that are frequently used in the federal legislative process.⁴² The glossary included concepts expressed in normative texts as well as terms and acronyms of political parties and permanent committees of the National Congress. To increase accessibility and dissemination of best practices, it was translated into Spanish and English.</p> <p>Milestone 2 led to the harmonization of legislative identifiers, which represents a significant advancement in facilitating the monitoring of legislative projects. As a result, both houses of the National Congress institutionalized the same identifier system in 2019, enabling easier tracking of how bills move between them.⁴³</p> <p>Milestone 3 aimed to make legislative texts available in an electronic standardized format called LexML⁴⁴, in accordance with Law No. 95/1998.⁴⁵ This milestone resulted in the publication of the main types of legislative proposals in the LexML format.⁴⁶ By August 2020, 4,584 legislative proposals had been published in this open and machine-readable format.⁴⁷ This increased to 7,635 proposals by March 2023, indicating a continuous practice that is crucial in enhancing oversight by interest groups and the general public.⁴⁸</p> <p>Milestone 4, focused on tracking the progress of bills, represents a significant stride in promoting transparency and accessibility to foster greater citizen participation and oversight. Legislative tracking tools on the institutional portals of the National Congress,⁴⁹ the Chamber of Deputies,⁵⁰ and the Federal Senate⁵¹ were developed to guide citizens in accessing information about bill progress and monitoring it. Once inside a legislative project, the tools enable various features such as public consultation, access to documents and news, review of an entire legislative process, and evidence for each legislative stage.</p> <p>Milestone 5 led to the elaboration and dissemination of materials to explain the legislative process to a diverse category of audience. The materials explained the harmonization of legislative projects, the legislative tracking portals, and the overall legislative process.⁵² Additionally, Milestone 6 sought to facilitate public participation in events to promote and disseminate the actions of the commitment. The in-person national events that were planned were cancelled given the COVID-19.⁵³ Nevertheless, online activities were conducted, among them an informatory video during the Global Open Parliament week of 2020 and an official launch of the Open Parliament Guide.⁵⁴</p> <p>Milestone 7 resulted in the adoption of an updated, more accessible Open Parliament Guide.⁵⁵ It included numerous references to best practices and serves</p>

	<p>as a valuable resource for interested legislative bodies looking to implement open parliament activities. Moreover, it was developed with and contains examples of state and municipal legislative bodies.</p> <p>The commitment fell short of achieving outstanding early results as the main objective of increasing participation from various segments in the legislative process was not fully met⁵⁶ and the participation of civil society stakeholders was low⁵⁷ during the implementation period. In the IRM Design Report, it was highlighted that the commitment structurally lacked civil society participation.⁵⁸ Moreover, the commitment, in its design and implementation, advanced the participation of state and local legislative bodies in the OGP process.</p>
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Commitment 8: Land transparency	
Aim of the commitment	<p>This commitment was highlighted as one of the noteworthy commitments in the IRM Design Report. Its main objective was to ensure transparency in land tenure by consolidating and publishing the available data. Specifically, it aimed to integrate urban and rural property registry databases produced by various public administration bodies into a single registry through the National Territorial Information Management System (SINTER). This initiative was crucial in promoting a comprehensive understanding of the land tenure situation in Brazil. However, implemented activities did not yield objectively verifiable outcomes. Therefore, there is no evidence of early results to report.</p>
<p>Did it open government? Did not change</p>	<p>Implementation of this commitment was limited and generated marginal early results, which can be attributed to limitations on civic participation opportunities in consolidating and updating the land registry.</p> <p>Stakeholders faced various challenges to generate meaningful outcomes following changes in the administrative structure, composition, and competencies of organizations and decision-making bodies participating in the commitment. Provisional Measure No. 870/2019 altered the structure and basic organization of the presidency and ministries.⁵⁹ This provisional measure underwent changes and was further institutionalized into Law No. 13844 in 2019.⁶⁰ These changes also had a direct impact on land tenure, such as in the regularization of the territorial rights of ‘quilombola’⁶¹ communities that were recognized in Article 68 of the Transitional Constitutional Provisions (ADCT) of the Federal Constitution of 1988. The measure/law opened the door for the government to appropriate this community’s lands, given their lack of land titles.⁶²</p> <p>Decree No. 9.759 of 2019,⁶³ further presented challenges to the commitment’s implementation. It revoked and established guidelines, rules, and limitations for collegial bodies⁶⁴ in the federal public administration, leading to the dissolution of several bodies of political deliberation that included civil society, and hindering social control over government processes and practices.</p> <p>In its self-assessment report, the government stated that five of the commitment’s nine milestones were completed, while the other four recorded limited progress.⁶⁵ However, these completed milestones were not based on delivering final outcomes but rather activities, such as a meeting in 2019 to present demands and discuss the integration of the National Rural Property Registry (CNIR) that involved the Civil House (i.e., Chief of Staff Ministry) (Milestone 1),⁶⁶ documents with demands from civil society and government responses (Milestone 4),⁶⁷ and meetings and workshops for presenting and discussing the CNIR structure and public interface implementation with civil society (Milestones 3 and 6).⁶⁸ Additionally, given Decree No. 9.759 of 2019</p>

	<p>limitations, it was not possible to establish a collegiate committee to monitor the implementation of the integration of databases.⁶⁹ Instead, a series of official meetings were held with civil society and government institutions.⁷⁰</p> <p>Completed milestones of this commitment mainly focused on discussions and workshops. They lacked tangible results pertaining to land transparency issues in Brazil. Meanwhile, milestones regarding rural properties which have the highest potential for results, recorded the least amount of progress. For example, Milestone 8, which was responsible for defining and implementing the Land Management System (SIGEF) 2.0 system, was reported to have only 20% completion.⁷¹ This low implementation was in part given a lack of consensus on how to integrate the databases and where to host the SIGEF (Milestone 2), vendors' hiring delays, unrealistic implementation timelines, and shifting the project to another platform initiative.⁷²</p> <p>Land tenure transparency remains an important policy to pursue in Brazil, even more critically considering the recently documented transgressions to certain communities.⁷³ The commitment was also limited in civic participation opportunities given the restricting norms in the Bolsonaro administration. As these measures have been officially revoked,⁷⁴ the IRM encourages retaking activities that impact land tenure transparency and protection with more active civic participation.</p>
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Commitment II: Government transparency - Access to Information Law in states and municipalities

<p>Aim of the commitment</p>	<p>One of the major transparency issues faced by states and municipalities in Brazil is the Access to Information Law (LAI) regulation,⁷⁵ which includes the need for an adequate system to facilitate the population's exercise of their right to access information. At the commitment co-creation, there was a significant absence of specific channels to monitor and process requests for information at the state and municipal levels.⁷⁶</p> <p>This commitment aimed to address the lack of an efficient, accessible, and established system for handling information requests at the state and municipal levels. To address these challenges, it sought to create a unified platform for access to information requests, which is now publicly available.⁷⁷</p>
<p>Did it open government? Major</p>	<p>The commitment was fully completed and generated major early results. The most significant outcome was observed under Milestone 6, which led to the integration and refinement of the Electronic Citizen Information System (e-SIC) system via the newly created Fala.BR (i.e., 'Talk Brazil') platform, which fulfills the implementation of the Access to Information Law in states and municipalities and improves the federal system in place. This initiative created new opportunities for citizens to access information and be informed while guaranteeing its sustainability, as subnational governments do not incur the cost of the platform.</p> <p>All of the commitment's 9 milestones were completed and followed a sequential logic that facilitated the creation and dissemination of the system. Milestone 1 aimed to implement a diagnosis of the Access to Information Law in states and municipalities to enhance the planning and development of the national electronic system for requesting information from municipalities and states. The Comptroller-General of the Union (CGU) and the Getulio Vargas Foundation conducted in-depth studies on the implementation level of the LAI at the subnational level and of the key determinants for local level</p>

transparency, finding that compliance was overall significantly deficient and attributable to a lack of compliance supervision.⁷⁸

Milestone 2 identified partners (public managers and society) for engagement in the initiative. By October 2021, 198 subnational entities had registered to adopt the developed tool.⁷⁹ Milestone 3 was conducted internally by the IT team within CGU, which concluded that implementing the system was technically feasible.⁸⁰ For Milestone 4, CGU and Instituto de Pesquisa DataSenado of the Federal Senate conducted a public consultation to gather inputs from various stakeholders in improving and adapting the national e-SIC system.⁸¹ This goal was successfully achieved with significant civil society participation and the involvement of 532 individuals.⁸² Finally, the system requirements were fully defined, given the inputs from previous activities, and taken as the basis the national e-SIC system (Milestone 5).⁸³

Milestone 6, which pertains to the development of the system, had the most potential for impact as it was the main outcome of the commitment's goal. It was also achieved and subsequently implemented with the Fala.BR platform in March 2020.⁸⁴ On Fala.BR, public managers can implement several activities to enhance transparency and improve interactions between citizens and the government. These included (1) managing the reception of information requests, complaints, feedback, suggestions, and compliments from citizens; (2) enabling automated deadline control for responses to ensure timely and efficient handling of requests and inquiries; (3) facilitating the forwarding of manifestations between Information Services to Citizens and Ombudsman Offices, therefore streamlining communication and coordination between these entities; and (4) customizing the system to meet the specific needs of the subnational governments, allowing for tailored configurations that suit specific structures and requirements.⁸⁵

The Fala.BR platform also allows for the registration of subnational entities in the Ombudsman system.⁸⁶ In this sense, registered states and municipalities can provide citizens with tools in a single platform to make information requests and express their feedback on services provided by these local governments.⁸⁷

According to the government self-evaluation report, a total of 198 organizations had adopted the tool as of 19 October 2021 (124 municipal executive organizations, 17 municipal legislative organizations, 57 state executive organizations, and 4 autonomous social services).⁸⁸

The remaining commitment milestones (7, 8, and 9) sought to build actions that fomented transparency, provide support material to public managers and society, and disseminate the system's existence. Milestone 8 focused on the development of support materials for managers and society. The Fala.BR platform includes comprehensive wiki manuals for its LAI and Ombudsman modules.⁸⁹ A webinar that further supports users in using the platform was also developed.⁹⁰ Milestones 7 and 9 were achieved through the development of the Time Brazil Program.

Time Brazil focuses on open government principles to support and guide states, municipalities, and the Federal District in adopting policies for integrity promotion and corruption prevention, creating transparent and accountable institutions, and ensuring representative, inclusive, and responsive social participation. The program also directly encourages the adoption of the Fala.BR platform. Additionally, the program has a strong component of dissemination of transparency initiatives, not limited to Fala.BR. It offers subnational entities the opportunity to participate in in-person and distance

	<p>training and to benefit from a network of local partners to facilitate access to solutions and dissemination of best practices.⁹¹ Furthermore, it has several resources to educate and inform the public on these initiatives.⁹² As a result of these efforts, the number of adoptions each month has increased noticeably.⁹³</p> <p>The existence of Fala.BR and supporting programs such as Time Brazil empower public managers to effectively handle information inquiries and interactions from the public, enhancing the overall transparency and accountability of government actions. By providing a user-friendly and efficient platform, Fala.BR encourages citizen engagement and participation, leading to a more informed and engaged public to promote accountability of government actions. Overall, the commitment's multi-faceted approach improved transparency, accountability, and participation with a major and measurable improvement⁹⁴ in opening government at the subnational level.</p> <p>Moving forward the questions, complaints, and suggestions sent by citizens through Fala.BR can serve as valuable input for identifying their needs and informing decision-making processes. If this commitment evolves into subsequent commitments in future action plans, it has the potential to better inform commitments and lead to the development of public policies that address citizens' demands.</p>
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¹ IRM Design Reports identified strong commitments as “noteworthy commitments” if they were assessed as verifiable, relevant, and having “transformative” potential impact. If no commitments met the potential impact threshold, the IRM selected noteworthy commitments from those with “moderate” potential impact. For the list of Brazil’s noteworthy commitments, see the Executive Summary of “IRM Brazil Design Report 2018–2020,” Open Government Partnership, 13 October 2020, <https://www.opengovpartnership.org/documents/brazil-design-report-2018-2020>.

² RDA Brazil serves as a neutral environment for ongoing discussions, raising awareness among new stakeholders, and fostering engagement on the topic. It has strengthened the national presence in the global landscape of research data management and openness with 91 members. See “RDA Brazil,” Research Data Alliance, <https://www.rda-alliance.org/groups/rda-brazil/members/all-members>.

³ See Milestone 3 of Commitment 3 in: “Brazil’s Open Government Repository: 4th National Action Plan,” Comptroller-General of the Union, accessed 30 May 2024, <https://www.gov.br/cgu/pt-br/governo-aberto/a-ogp/planos-de-acao/4o-plano-de-acao-brasileiro/compromisso-3-docs/inovacao-e-governo-aberto-na-ciencia-monitoramento-e-execucao>.

⁴ “Ciência Aberta na Fiocruz,” [Open Science in Fiocruz], Fiocruz, accessed 30 May 2024, <https://portal.fiocruz.br/ciencia-aberta>.

⁵ See Commitment 3 in: “End-of Term Self-Assessment Report,” Comptroller-General of the Union, <https://www.opengovpartnership.org/es/documents/brazil-end-of-term-self-assessment-2018-2021>. The IRM researcher confirmed that the views of the video series were above 4,688 views.

⁶ See videos 1 to 6 of Milestone 4 of Commitment 3 in: “Brazil’s Open Government Repository: 4th National Action Plan,” Comptroller-General of the Union. Also available at: “Eduplay,” RNP, <https://eduplay.rnp.br/portal/home>; “Compromisso pela Ciência Aberta,” YouTube, accessed 30 May 2024, https://www.youtube.com/results?search_query=Compromisso+pela+Ci%C3%Aancia+Aberta.

⁷ “O que é ciência aberta? 1º oferta,” Fiocruz, <https://campusvirtual.fiocruz.br/portal/?q=node/38010>.

⁸ See CNPq, “Lançamento do repositório de dados de pesquisa LattesData CNPq/IBICT,” [Launch of the LattesData CNPq/Ibict research data repository], YouTube, 28 June 2022, https://www.youtube.com/watch?v=qO_Q9TaB0CE.

⁹ “End-of Term Self-Assessment Report,” Comptroller-General of the Union.

¹⁰ Fortaleza, interview.

¹¹ “Compromisso 3 pela Ciência Aberta é encerrado com quatro repositórios implantados pela RNP e Ibict,” [Commitment 3 for Open Science ends with four repositories implemented by RNP and Ibict], RNP, 7 August 2020, <https://www.rnp.br/noticias/compromisso-3-pela-ciencia-aberta-e-encerrado-com-quatro-repositorios-implantados-pela-rnp>. The pilot link is no longer available, but evidence of the existence of such repositories is available on “Embrapa repository,” Embrapa, accessed 30 May 2024, <https://oasisbr.ibict.br/vufind/Search/Results?type=AllFields&filter%5b%5d=format%3A%22dataset%22>; “Fiocruz repository,” Fiocruz, accessed 30 May 2024, <https://arcadados-beta.fiocruz.br>.

¹² The books are available at: “CGU repository, Commitment 3, Milestone 6,” Comptroller-General of the Union and alternatively at: https://www.abecbrasil.org.br/arquivos/Ciencia_aberta_editores_cientificos_Ebook.pdf and https://www.abecbrasil.org.br/arquivos/Topicos_dados_abertos_editores_cientificos.pdf.

¹³ See “SciELO preprints,” Scientific Electronic Library Online, <https://preprints.scielo.org/index.php/scielo>.

¹⁴ See “Emerging Research Information,” IBICT, <https://preprints.ibict.br/sobrePreprint.jsp>.

¹⁵ “End-of Term Self-Assessment Report,” Comptroller-General of the Union.

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- 16 “End-of Term Self-Assessment Report,” Comptroller-General of the Union. See: the final status report of Commitment 3 in: “Brazil’s Open Government Repository: 4th National Action Plan,” Comptroller-General of the Union.
- 17 Patricia Bertin (Embrapa), interview by IRM researcher, 21 July 2023.
- 18 Neide De Sordi (formerly of Open Knowledge Brasil), interview by IRM researcher, 28 November 2023.
- 19 Bertin, interview.
- 20 Bertin, interview.
- 21 De Sordi, interview.
- 22 De Sordi, interview.
- 23 Fortaleza, interview.
- 24 Sarah Johnson, “‘A never-ending fight’: cancer and diabetes cases soar in the wake of Mariana dam disaster,” *The Guardian*, 22 August 2023, <https://www.theguardian.com/global-development/2023/aug/22/a-never-ending-fight-cancer-and-diabetes-cases-soar-in-wake-of-mariana-dam-disaster>; G. W. Fernandes, F. F. Goulart, B. D. Ranieri, M. S. Coelho, K. Dales, N. Boesche, M. Bustamante, F. A. Carvalho, D. C. Carvalho, R. Dirzo, S. Fernandes, P. M. Galetti, V. E. G. Millan, C. Kielke, J. L. Ramirez, A. Neves, C. Rogass, S. P. Ribeiro, A. Scariot, and B. Soares-Filho, “Deep into the mud: ecological and socioeconomic impacts of the dam breach in Mariana, Brazil,” *Natureza & Conservação*, 2016, 14 (2), pp. 35–45.
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- 27 See Commitment 6 in: “Brazil’s Open Government Repository: 4th National Action Plan,” Comptroller-General of the Union.
- 28 See Commitment 6 in: “Brazil’s Open Government Repository: 4th National Action Plan,” Comptroller-General of the Union.
- 29 See Commitment 6 in: “End-of Term Self-Assessment Report,” Comptroller-General of the Union.
- 30 See “Fundação Renova,” Fundação Renova, <https://www.fundacaorenova.org>. The given link refers to the current portal. For this analysis it was evaluated until 2021 using Wayback Machine snapshots.
- 31 “End-of Term Self-Assessment Report,” Comptroller-General of the Union. There is also a summary document of informational themes demanded by the surveyed public. See Milestone 1 evidence of Commitment 6 in: “Brazil’s Open Government Repository. 4th National Action Plan,” Comptroller-General of the Union.
- 32 Information obtained by using Wayback Machine at: <https://transparencia.fundacaorenova.org>, see: <https://web.archive.org/web/20211023181705/https://transparencia-fundacaorenova.hub.arcgis.com>.
- 33 IRM researcher’s calculations based on disclosed expenses data and taking as reference USD Exchange rate of 30 May 2024. See <https://transparencia.fundacaorenova.org>.
- 34 Comptroller-General of the Union, pre-publication comments, 5 April 2024.
- 35 The 2021 snapshot of the portal shows evidence of these activities. The current portal remains active as well, see Programs (e.g., PG 06 Social Dialogue) in: <https://transparencia.fundacaorenova.org>.
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- 37 “Contingency Plan,” Escola Virtual, accessed 30 May 2024, <https://www.escolavirtual.gov.br/curso/873>; “Evidence of the workshop,” Government of Brazil, accessed 30 May 2024, <https://www.gov.br/mdr/pt-br/noticias/em-governador-valadares-mg-mdr-promove-workshop-sobre-aco-es-de-emergencia-em-barragens>.
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- 43 “Ato Conjunto N. 1 [Joint Act],” Chamber of Deputies, 19 December 2018, https://www2.camara.leg.br/legin/int/atocon/2018/atoconjunto-1-19-dezembro-2018-787498-norma-cd-sgm_sf-sgm.html. See also: <https://www2.camara.leg.br/a-camara/documentos-e-pesquisa/arquivo/sites-tematicos/simplificou/novas-regras-para-numeracao-unificada-das-proposicoes-legislativas>.
- 44 For more information on LeXML, see <https://projeto.lexml.gov.br/documentacao/resumo-em-ingles>.
- 45 Law 95/1998 and its amendments, https://www.planalto.gov.br/ccivil_03/leis/lcp/lcp95.htm.
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- 47 See Commitment 7 in: “End-of Term Self-Assessment Report,” Comptroller-General of the Union.
- 48 Based on the total legislative proposal displayed in <https://www.lexml.gov.br/busca/search?keyword=fmftlexml>, accessed March 2023.
- 49 See <https://www.congressonacional.leg.br/materias/medidas-provisorias>.
- 50 See <https://www.camara.leg.br/busca-portal/proposicoes/pesquisa-simplificada>.
- 51 See <https://www25.senado.leg.br/web/atividade>.
- 52 Evidence of these materials can be accessed in Commitment 7, Milestone 5 in: “Brazil’s Open Government Repository. 4th National Action Plan,” Comptroller-General of the Union.

⁵³ Report on the commitment implementation, July 2020, Commitment 7 in: “Brazil’s Open Government Repository. 4th National Action Plan,” Comptroller-General of the Union.

⁵⁴ “Global Open Parliament week,” YouTube, https://www.youtube.com/watch?v=CsjDlCjAjwc&ab_channel=C%C3%A2maradosDeputados.
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⁵⁶ “Governo Aberto na prática: Resultados dos compromissos - Transparência do processo legislativo,” [Open Government in practice: Results of commitments - Transparency of legislative process], Comptroller-General of the Union, 25 June 2021, <https://www.gov.br/cgu/pt-br/governo-aberto/noticias/2021/6/governo-aberto-na-pratica-resultados-dos-compromissos-transparencia-do-processo-legislativo>.

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⁵⁸ See Commitment 7 in: “IRM Design Report 2018–2020,” Open Government Partnership.

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⁶⁴ Órgãos colegiados [Collegiate Bodies] are consultative and/or deliberative bodies, composed of representatives from different public sectors and also from civil society, created to deal with specific topics, in order to support government action and make collective interests compatible with public policies. See <https://www.gov.br/planalto/pt-br/acao-a-informacao/participacao-social/conselhos-e-orgaos-colegiados>.

⁶⁵ See Commitment 8 in: “End-of Term Self-Assessment Report,” Comptroller-General of the Union.

⁶⁶ See Commitment 8 in: “End-of Term Self-Assessment Report,” Comptroller-General of the Union; Final report on the commitment implementation, August 2021, Commitment 8 in: “Brazil’s Open Government Repository. 4th National Action Plan,” Comptroller-General of the Union.

⁶⁷ See Commitment 8, Milestone 4 documents in: “Brazil’s Open Government Repository. 4th National Action Plan,” Comptroller-General of the Union.

⁶⁸ “End-of Term Self-Assessment Report,” Comptroller-General of the Union; See Commitment 8, Milestone 6 documents in: “Brazil’s Open Government Repository. 4th National Action Plan,” Comptroller-General of the Union.

⁶⁹ See Commitment 8 in: “End-of Term Self-Assessment Report,” Comptroller-General of the Union.

⁷⁰ “Joint Technical Note Cocad/DFC nº 005/2020,” <https://www.gov.br/receitafederal/pt-br/assuntos/orientacao-tributaria/cadastros/portal-cnir/legislacao/legislacao-cadastro-rural/nota-tecnica-conjunta-cocad-dfc-005-2020-entidades-da-sociedade-civil.pdf>; “Notice Cocad/DFC nº 3,” 12 March 2021, <https://www.gov.br/receitafederal/pt-br/assuntos/orientacao-tributaria/cadastros/portal-cnir/ogp-transparencia-fundiaria/notas-tecnicas-transparencia-fundiaria/editais/edital-cocad-dfc-3-reuniao-de-abril-2021-sociedade-civil.pdf>.

⁷¹ See Commitment 8 in: “End-of Term Self-Assessment Report,” Comptroller-General of the Union.

⁷² See Commitment 8 in: “End-of Term Self-Assessment Report,” Comptroller-General of the Union.

⁷³ Pereira da Silva and Cordoba, “Indigenous and Afro-Brazilian lands are under greater threat in Brazil during COVID-19,” The Conversation.

⁷⁴ In 2023, the Lula Administration revoked Provisional Measure nº. 870 of 1 January 2019 and Law nº 13.844, of 18 June 2019 via Law nº 14.600 of 19 June 2023, https://www.planalto.gov.br/ccivil_03/_ato2023-2026/2023/Lei/L14600.htm#art78. Decree nº. 9.759 of 11 April 2019 was revoked by Decree nº 11.371 of 1 January 2023, https://www.planalto.gov.br/ccivil_03/_ato2023-2026/2023/Decreto/D11371.htm#art1.

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⁷⁶ See Commitment 11 in: “4th Brazilian Action Plan,” Comptroller-General of the Union.

⁷⁷ “Plataforma Integrada de Ouvidoria e Acesso à Informação,” [Integrated Ombudsman and Information Access Platform], Comptroller-General of the Union, <https://falabr.cgu.gov.br/web/home>.

⁷⁸ “Report Implementation and compliance indicators for access to information public at subnational level in Brazil,” Comptroller-General of the Union and Getulio Vargas Foundation, December 2020; Gregory Michener and Simeon Nichter, “Working paper: Determining variables for compliance with the Access to Information Law in Brazilian municipalities,” December 2020. See Commitment 11, Milestone 1 documents in: “Brazil’s Open Government Repository. 4th National Action Plan,” Comptroller-General of the Union.

⁷⁹ See Commitment 11 in: “End-of Term Self-Assessment Report,” Comptroller-General of the Union.

⁸⁰ See Meeting 13 June 2019, Commitment 11, Milestone 2 in: “Brazil’s Open Government Repository. 4th National Action Plan,” Comptroller-General of the Union.

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- ⁸¹ “CGU e Senado realizam pesquisa para desenvolvimento do e-SIC Nacional,” [CGU and Senate carry out research to develop National e-SIC], Comptroller-General of the Union, 22 January 2019, <https://www.gov.br/cgu/pt-br/governo-aberto/noticias/2019/01/cgu-e-senado-realizam-pesquisa-para-desenvolvimento-do-e-sic-nacional>. Participants included citizens, academics, users of the Access to Information Law (LAI), non-governmental organizations, and developers of systems linked to entities and public bodies.
- ⁸² See Commitment 11 in: “End-of Term Self-Assessment Report,” Comptroller-General of the Union.
- ⁸³ Final report on the commitment implementation, 19 January 2021, Commitment 11 in: “Brazil’s Open Government Repository. 4th National Action Plan,” Comptroller-General of the Union.
- ⁸⁴ “CGU oferece sistema eletrônico de acesso à informação a estados e municípios,” [CGU offers electronic information access system to states and municipalities], Comptroller-General of the Union, 8 April 2020, <https://www.gov.br/cgu/pt-br/governo-aberto/noticias/2020/4/cgu-oferece-sistema-eletronico-de-acesso-a-informacao-a-estados-e-municipios>.
- ⁸⁵ See Commitment 11 in: “End-of Term Self-Assessment Report,” Comptroller-General of the Union.
- ⁸⁶ “Plataforma Integrada de Ouvidoria e Acesso à Informação,” Comptroller-General of the Union.
- ⁸⁷ The ombudsman module of Fala.BR can be accessed at: <https://falabr.cgu.gov.br/web/home?modoOuvidoria=1&ouvidoriaInterna=false>.
- ⁸⁸ See Commitment 11 in: “End-of Term Self-Assessment Report,” Comptroller-General of the Union.
- ⁸⁹ The manual wiki can be accessed at: https://wiki.cgu.gov.br/index.php/Fala.BR_-_Manual.
- ⁹⁰ Comptroller-General of the Union, “Access to Information Law: dissemination to citizens and benefits for municipal management,” YouTube, https://www.youtube.com/watch?v=gXFNXUjPegg&ab_channel=Controladoria-GeraldaUni%C3%A3o-CGU.
- ⁹¹ See Commitment 11 in: “End-of Term Self-Assessment Report,” Comptroller-General of the Union.
- ⁹² See heading such as “Voce Sabia?” [Did you know?] “Tire Suas Dúvidas” [Clear your Doubts] at <https://www.gov.br/cgu/pt-br/governo-aberto/time-brasil> and <https://www.gov.br/cgu/pt-br/governo-aberto/time-brasil/voce-sabia>.
- ⁹³ The Time Brasil program had 108 members as of March 2022. See “Time Brasil já conta com 108 membros,” [Team Brasil already has 108 members], Comptroller-General of the Union, <https://www.gov.br/cgu/pt-br/governo-aberto/noticias/2022/03/time-brasil-ja-conta-com-108-membros>.
- ⁹⁴ During the commitment’s implementation there was a measurable improvement. The second edition of “Escala Brasil Transparente - Avaliação 360°” [Transparent Brazil Scale - 360° Assessment], which measures compliance with LAI by subnational governments and the Federal District, gives the results for the 2020 evaluation compared to the 2017 instance. In general, large municipalities (50,000 inhabitants or more) that had a score below 5 (from a 0 to 10 scale) were reduced from 22% of the total to 16%. Furthermore, those with scores between 9 and 10 increased their share from 12% to 18%. CGU. CGU divulga resultado da 2ª edição da Escala Brasil Transparente - Avaliação 360°, 15 March 2021, <https://www.gov.br/cgu/pt-br/assuntos/noticias/2021/03/cgu-divulga-resultado-da-2a-edicao-da-escala-brasil-transparente-avaliacao-360deg>; Comptroller-General of the Union, pre-publication comments, 5 April 2024.

2.4. Commitment implementation

The table below includes an assessment of the level of completion for each commitment in the action plan.

Commitment	Completion
<p>I. Open government in states and municipalities</p>	<p>SUBSTANTIAL</p> <p>This commitment aimed to promote collaborative actions to disseminate knowledge and share good practices in open government by fostering engagement with subnational actors. Seven out of the eight milestones were successfully achieved.</p> <p>Milestone 1, aimed at articulating the dissemination of open government concepts and practices, gathered information from commitment actors rather than a broader set of stakeholders.¹ Milestone 2, which sought to map and research cases and good practices on open government, was not completed as planned following institutional changes in the civil society responsible for its implementation and the lack of human and financial resources by other participating organizations to assume responsibility.²</p> <p>Milestones 3, 4, and 5 achieved meaningful completion. Milestone 3 involved the development of a distance learning course on open government,³ which was completed by 4,554 participants by October 8, 2021.⁴ Milestone 4 saw the creation of a course on Data Journalism for Local Coverage.⁵ Milestone 5 resulted in the development of the Open Government board game.⁶ Both the courses and the game serve as valuable educational resources, contributing to knowledge dissemination and capacity building on open government principles.⁷</p> <p>For Milestone 6, specific workshops on open government at the subnational level were developed and implemented at the III and IV Brazilian National Meeting on Open Government in December 2018 and November 2019.⁸ These ongoing events aim to facilitate wide discussions on open government and represent an important space for knowledge sharing and dissemination of best practices.</p> <p>For Milestone 7, the open government theme was presented to the National Internal Control Council (CONACI) on 30 November 2018, with the aim of engaging and informing internal control bodies at the subnational level.⁹ Milestone 8 was successfully accomplished with the development of the “Guidelines for the Formation of Open Government Networks in States and Municipalities.”¹⁰</p>
<p>2. Open data ecosystem</p>	<p>COMPLETE</p> <p>This commitment aimed to establish an open data ecosystem that fosters the disclosure and usage of federal, state, and municipal data in a way that meets society’s demands.¹¹ It strengthened transparency by setting data disclosure standards, sensitized civil society and the three branches of government on current disclosure efforts and best practices, and encouraged social accountability actions from civil society.</p>

	<p>According to the government self-evaluation report,¹² all milestones of this commitment were completed, although the IRM evaluates early results as marginal. It is worth noting that the Reference Model for Open Data Disclosure, the main deliverable of the commitment, was published in October 2020.¹³ However, the dissemination efforts of the model were hampered by the COVID-19 pandemic.¹⁴</p> <p>Milestone 1 on the identification of actors in the open data ecosystem was fulfilled through an online consultation.¹⁵ As a learning, it highlighted the difficulty of systematically mapping actors/users given the dispersion and lack of direct exchanges in the ecosystem.¹⁶ Milestones 2 and 3, on the identification of existing models of data disclosure and their strengths and limitations, resulted in the document “Modelos de Abertura de Dados: Potencialidades e Limites” (Data Opening Models: Potentials and Limits).¹⁷</p> <p>Milestones 4, 5, and 6 sought to develop the reference model. An initial structure was presented (Milestone 4),¹⁸ for which each theme was further elaborated (Milestone 5),¹⁹ and improved and validated by public consultation (Milestone 6).²⁰ The consultation received 43 responses,²¹ which were considered and responded to in a transparent manner.²² The commitment coordinator highlighted the value of collaborative participation in the consultation process and, in general, for the development of the reference model.²³</p> <p>The final goal of the commitment was the launch (Milestone 8) and dissemination of the reference model (Milestones 7 and 9). The reference model, after incorporating the public consultation and expert feedback, was launched.²⁴ In general, the final model included an (1) introduction to the concepts and benefits of open data, (2) recommendations and best practices on data publication and reutilization, (3) guidelines and best practices directly related to states, municipalities and strategic national themes, and (4) fundamentals on open data governance structures.²⁵ Additionally, the guidelines to assist states and municipalities in disclosing and selecting a minimum set of information and topics within their jurisdiction were strengthened via a direct consultation of 186 specialists in diverse sectors at the national, state, and municipal levels.²⁶</p> <p>The dissemination of the reference model under Milestones 7 and 9 was documented in a communication plan²⁷ and a schedule that contained all the information and news published and posted by the aforementioned stakeholders.²⁸ However, the dissemination was significantly affected by the restrictions related to the COVID-19 pandemic as planned events to disseminate the reference model and promote integration, capacity-building, and awareness among society at all administrative levels were not carried out.²⁹</p>
<p>3. Innovation and open government in science</p>	<p>COMPLETE</p> <p>For details regarding the implementation and early results of this commitment, see Section 2.3.</p>
<p>4. Strengthening public oversight over the Food and Nutrition Security</p>	<p>LIMITED</p> <p>This commitment aimed to enhance participation and public oversight over the Food and Nutrition Security Policy (PLANSAN) by implementing training initiatives for public officials and civil society to raise awareness of</p>

<p>National Plan (PLANSAN)</p>	<p>the human right to adequate food and the role of public oversight to strengthen food and nutrition security.</p> <p>Commitment 4 was established in accordance with the Organic Law of Food and Nutrition Security (Law n° 11.346 of 2006),³⁰ which created the National Food and Nutrition Security System (SISAN), a public, intersectoral, and participatory system that facilitates coordination among all levels of government and society for the implementation and execution of food and nutrition security policies.³¹</p> <p>CONSEA was an essential institution envisioned under SISAN to facilitate effective public oversight and citizen participation in the formulation, monitoring, and evaluation of food and nutrition security policies, with the goal of progressively realizing the human right to adequate food.³²</p> <p>However, the issuance of Provisional Measure No. 870/2019³³ meant the initial dissolution of CONSEA, as a collegiate body, alongside other administrative changes in the structure of participating organizations involved in the commitment. This normative measure significantly impacted the commitment's implementation as CONSEA played a central role in four out of the six agreed-upon milestones.³⁴ Nevertheless, it was soon re-established with the conversion of Provisional Measure No. 870/2019 into Law No. 13.844/2019³⁵ as an immediate advisory body to the President of the Republic, as initially required in Law No. 11.346/2006.³⁶</p> <p>The circumstances arising from CONSEA's initial dissolution involved reviewing and renegotiating some actions, normative adjustments, and redefining civil society representations. The Ministry of Citizenship, the lead institution of the commitment, worked with other stakeholders to overcome these challenges by organizing implementation meetings and establishing partnerships with universities.³⁷ Despite these efforts, Commitment 4 did not meet most of the deadlines and failed to fully implement some of its milestones. The completion level of commitment was reported at 62%.³⁸</p> <p>According to the government self-evaluation report, only 2 out of the 6 milestones were fully completed.³⁹ Milestone 1 mapped the existence of distance learning resources related to food and nutrition security and the human rights to adequate food.⁴⁰ Milestone 3 was completed with the realization of two rounds of state seminars on social oversight in food and nutrition security in a webinar format.</p> <p>Milestone 2 was reported as 70% completed.⁴¹ Its objective was to build a convergence agenda for training in Food and Nutrition Security (SAN) and the Human Right to Adequate Food (DHAA) through various activities. In 2020, agreements were formalized with six state governments (Acre, Amazonas, Distrito Federal, Goiás, Mato Grosso, and Pará), totaling approximately 3 million reais allocated to the management, training, and structuring of SISAN. Eleven further agreements were subsequently signed, covering 17 states in total.⁴² As part of this milestone, the Federal University of Pernambuco, Federal University of Rio Grande do Norte, and Federal University of Paraíba launched a booklet on DHAA and an introduction to SAN Policies.⁴³</p> <p>Milestone 4 was reported as 60% completed with the provision of 3 distance learning courses on SAN and DHAA despite being impacted by the dissolution of CONSEA and COVID-19 pandemic. Additionally, an</p>
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	<p>extension course on productive rural promotion for food security and nutritional education was developed for family farmers.⁴⁴</p> <p>Only 20% of the objectives of Milestones 5 and 6 were achieved.⁴⁵ The self-evaluation report mentioned initial negotiations regarding the offering of courses on a virtual platform (Milestone 5) and the inclusion of courses on the subject in the National School of Public Administration (Milestone 6).</p> <p>Owing to its marginal potential impact, the commitment milestones were mostly to educate and socialize the concept without increasing measures for public participation and oversight. Thus, it represented only a foundational step in this sector. Furthermore, the COVID-19 pandemic and the initial dissolution of participatory bodies such as CONSEA limited the planned diffusion and development of the various training activities.</p>
<p>5. Analysis over the user satisfaction and ANTT regulation social impact</p>	<p>COMPLETE</p> <p>Commitment 5 aimed to enhance the data collection of user satisfaction with transportation services, such as roads, railroads, and interstate buses. According to the coordinator of the commitment, the goal was to develop a technology that could integrate data from different systems to gather citizens' feedback and improve the regulatory activities of the National Association of Land Transportation (ANTT).⁴⁶ The commitment's main goal was achieved via the launch of a larger initiative by CGU, "Conselho de Usuários" [Users' Council].⁴⁷</p> <p>All milestones of this commitment were successfully completed.⁴⁸ Milestones 1 and 2 referred to mapping the necessary data and collection tools for evaluating services. Milestone 4 defined the selection strategy of the technological tool to be used, while Milestone 3 studied its feasibility. Milestone 5 implemented the selection strategy, and Milestone 6 concluded with the selection of a tool for data collection on user satisfaction with transportation services.⁴⁹</p> <p>During the implementation of Commitment 5, the publication of Decree No. 10.228⁵⁰ on 5 February 2020 established the Ombudsman System and created user councils for public services within the administration of the Federal Executive Power. Most crucially, the decree assigned the Comptroller-General of the Union (CGU) to provide a specific electronic system integrated with other governmental agencies aimed at enabling the implementation of national satisfaction surveys with users of public services.⁵¹</p> <p>Subsequently, the CGU developed the Virtual Platform for User Councils of Public Services.⁵² ANTT expressed its interest in using the platform during the fourth meeting between commitment coordinators. It dropped analyzing the tools raised in Milestone 2 using the model developed in Milestone 4 and instead focused on completing Milestones 3, 5, and 6.⁵³ While several milestones were ongoing or completed (milestones 1, 2, 4, and 5)⁵⁴, adopting the CGU tool allowed for the completion of the commitment's goal. Furthermore, it permitted addressing delays and challenges brought by the COVID-19 pandemic and the lack of involvement by other actors, which had overburdened ANTT.⁵⁵</p> <p>The CGU then authorized the completion of the commitment, defining the CGU Platform as the mechanism for data collection to improve services</p>

	regulated by ANTT and promote public participation in satisfaction surveys. ⁵⁶ Additionally, utilizing the platform would incur zero implementation costs for ANTT, therefore saving public funds in the long term. It also provides autonomy and flexibility in conducting surveys at shorter intervals compared to in-person surveys. ⁵⁷
6. Transparency and public oversight over Mariana's reparation processes and other municipalities in the region	SUBSTANTIAL For details regarding the implementation and early results of this commitment, see Section 2.3.
7. Transparency in legislative process	COMPLETE For details regarding the implementation and early results of this commitment, see Section 2.3.
8. Land transparency	LIMITED For details regarding the implementation and early results of this commitment, see Section 2.3.
9. Open government and climate	LIMITED This commitment aimed to enhance climate policy planning and management through effective civic participation, specifically by evaluating policies and actions to expand spaces for social participation. However, only two out of the eight milestones comprising this commitment were fully completed. ⁵⁸ The completed milestones related to the identification and mapping of academic studies and articles on climate change impact (Milestone 1) and national and international documents and experiences in evaluating climate change policies and actions (Milestone 2). Challenges and disagreements between civil society and the government regarding the scope of policies to be evaluated especially affected the implementation of Milestone 3. This ultimately led to civil society formally withdrawing from the commitment, as stated in a document signed by several civil society organizations available in the online repository. ⁵⁹ While the government reported advancement on other milestones, ⁶⁰ no specific evidence was provided to support these claims. In the final execution report of the commitment, it was evident that the conclusion of most milestones was dependent on the defined scope pursued and not accomplished under Milestone 3. ⁶¹ Despite the political context and the importance of establishing a legitimate space to continue the climate change agenda, this commitment did not generate significant results. The Brazilian OGP Coordinating Committee assessed that insufficient time and unfavorable conditions to fully implement the commitment contributed to its limited progress. ⁶² As such, there is no evidence of early results to report.

<p>10. Open government and water resources</p>	<p>COMPLETE</p> <p>This commitment aimed to prioritize water-related issues on the public policy agenda through improved planning, monitoring, capacity-building, and evaluation of management instruments. Coordinated by the National Water and Basic Sanitation Agency (ANA), it sought to enhance the National Water Resources Information System (SNIRH) through a participatory process and to build the capacity of committees in critical areas for integrated water resources management.⁶³</p> <p>Under Milestone 1, ANA conducted a mapping and selection of critical areas,⁶⁴ by leveraging an available situation report from 2017⁶⁵ and mapping critical basins.⁶⁶ Under Milestone 2, ANA organized a workshop to instruct and assess the SNIRH with the basin committee and civil society at the 11th National Meeting of Basin Committees in Foz do Iguaçu on 21–25 October 2019.⁶⁷</p> <p>An online consultation on the SNIRH to understand user experience regarding the system's structure, content coverage, and access methods was conducted (Milestone 3).⁶⁸ Subsequently, a document to consolidate responses garnered from the public online consultation was published (Milestone 4).⁶⁹</p> <p>Under Milestone 5, ANA evaluated and prioritized suggestions to improve the SNIRH and the system's missing information. The results of this evaluation and prioritization process were reported in a document.⁷⁰ Subsequently, ANA undertook actions to improve the SNIRH. This included the release of a new version of the SNIRH metadata portal,⁷¹ which was presented at the Brazilian Symposium on Spatial Data Infrastructures⁷² and in a virtual class for the audience of the University of Brasília,⁷³ which had been viewed 720 times as of October 2021.⁷⁴ For Milestone 7, ANA prepared a report on the use of SNIRH information by the basin committees of the selected critical areas.⁷⁵ Finally, with Milestone 8 ANA launched an online course for the public to better take advantage of the SNIRH as an informational, monitoring, and water resources management tool.⁷⁶</p>
<p>11. Access to Information Act in states and municipalities</p>	<p>COMPLETE</p> <p>For details regarding the implementation and early results of this commitment, see Section 2.3.</p>

¹ The evidence for milestone 1 shows eight entities responded to seven questions. Seven of these entities were official actors of the commitment. The remaining entity from civil society appears to have joined the commitment as it was present in the monitoring meetings. See “Brazil’s Open Government Repository: 4th National Action Plan,” Comptroller-General of the Union, accessed 30 May 2024, <https://www.gov.br/cgu/pt-br/governo-aberto/a-ogp/planos-de-acao/4o-plano-de-acao-brasileiro/compromisso-3-docs/inovacao-e-governo-aberto-na-ciencia-monitoramento-e-execucao>.

² See final implementation report on Commitment 1 in: “Brazil’s Open Government Repository: 4th National Action Plan,” Comptroller-General of the Union.

³ “Está disponível curso gratuito sobre Governo Aberto,” [Free course on Open Government is available], Comptroller-General of the Union, 9 September 2019, <https://www.gov.br/cgu/pt-br/governo-aberto/noticias/2019/09/esta-disponivel-curso-gratuito-sobre-governo-aberto>. The course is offered via AVAMEC platform of the Ministry of Education, but users need to register to see it on: <https://avamec.mec.gov.br/-/usuario/autenticar>.

⁴ See Commitment 1 in: “End-of Term Self-Assessment Report,” Comptroller-General of the Union, <https://www.opengovpartnership.org/es/documents/brazil-end-of-term-self-assessment-2018-2021>.

⁵ “Jornalismo de dados para coberturas locais,” [Data journalism for local coverage], Open Knowledge Brasil, <https://escoladedados.org/courses/jornalismo-de-dados-para-coberturas-locais>.

⁶ “Jogo de Governo Aberto,” [Open Government Game], Tabletopia, <https://tabletopia.com/games/jogo-de-governo-aberto>.

⁷ See comments from Commitment 1 stakeholders on implementation results: Comptroller-General of the Union, “OGP - 4º Plano de Ação Brasileiro - Compromisso 1,” [OGP - 4th Brazilian Action Plan - Commitment 1], YouTube, 17 July 2021, <https://www.youtube.com/watch?v=WvhrqDj14zA>.

⁸ A workshop titled “Governo Aberto no Brasil e em São Paulo: ações concretas dos planos nacional e subnacional,” [Open Government in Brazil and São Paulo: concrete actions at national and subnational levels] was part of the Third Brazilian Open Government Meeting on 4 December 2018, see: <https://governoaberto.sched.com/list/descriptions>, accessed 30 May 2024; a workshop titled “Na prática: abrindo governo em cidades e estados,” [In practice: opening government in cities and states] was presented at the Fourth Open Government Meeting on 26 November 2019, see https://www.prefeitura.sp.gov.br/cidade/secretarias/casa_civil/reacoes_institucionais/governo_aberto_na_cidade_de_sao_paulo/index.php?p=291349; “Report workshop ‘In practice: opening government in cities and states,’” Comptroller-General of the Union, 26 November 2019, <https://www.gov.br/cgu/pt-br/governo-aberto/a-ogp/planos-de-acao/4o-plano-de-acao-brasileiro/compromisso-1-docs/relatoria-oficina-prefeitura-de-sao-paulo-2019.pdf>.

⁹ The theme was presented as part of wider meeting/event of CONACI under the title “Práticas de Governo Aberto a partir das Diretrizes Internacionais,” [Open Government Practices based on International Guidelines], 30 November 2018, <https://acessoinformacao.es.gov.br/Not%C3%ADcia/secont-apresenta-robota-maila-na-29a-reuniao-tecnica-do-conaci-em-campo-grande>; Comptroller-General of the Union, pre-publication comments, 20 March 2024.

¹⁰ “Diretrizes para formação de redes de governo aberto em estados e municípios,” [Guidelines for formation of open government networks in states and municipalities], Comptroller-General of the Union, https://www.gov.br/cgu/pt-br/governo-aberto/a-ogp/planos-de-acao/4o-plano-de-acao-brasileiro/compromisso-1-docs/marco8_documento.pdf.

¹¹ See Commitment 2 in: “4º Plano de Ação Brasileiro,” [4th Brazilian Action Plan], Comptroller-General of the Union, <https://www.gov.br/cgu/pt-br/governo-aberto/a-ogp/planos-de-acao/4o-plano-de-acao-brasileiro>.

¹² See Commitment 2 in: “End-of Term Self-Assessment Report,” Comptroller-General of the Union.

¹³ “Modelo de Referência para Publicação de Dados Abertos é lançado,” [Reference Model for Open Data Publishing is launched], Comptroller-General of the Union, updated 11 March 2022, <https://www.gov.br/cgu/pt-br/assuntos/noticias/2020/09/modelo-de-referencia-para-publicacao-de-dados-abertos-e-lancado>.

¹⁴ See Commitment 2 in: “End-of Term Self-Assessment Report,” Comptroller-General of the Union.

¹⁵ “Pesquisa mapeia atores e redes de dados abertos governamentais,” [Research maps actors and network of open government data users], Comptroller-General of the Union, 3 June 2019, <https://www.gov.br/cgu/pt-br/governo-aberto/noticias/2019/06/pesquisa-mapeia-atores-e-redes-de-dados-abertos-governamentais>.

¹⁶ “Governo Aberto na Prática: Resultados dos Compromissos - Ecossistema de Dados Abertos,” [Open Government in Practice: Results of Commitments - Open Data Ecosystem], Comptroller-General of the Union, updated 24 August 2022, https://www.gov.br/cgu/pt-br/governo-aberto/noticias/2021/6/governo-aberto-na-pratica-resultados-dos-compromissos-ecossistema-de-dados-abertos?_authenticator=e9efafb87fbd61292f936f6ee46d817b2898cad6.

¹⁷ See Commitment 2 - Data Opening Models: Potential and Limits in: “Brazil’s Repository, 4th National Action Plan,” Comptroller-General of the Union, <https://www.gov.br/cgu/pt-br/governo-aberto/a-ogp/planos-de-acao/4o-plano-de-acao-brasileiro/compromisso-2-docs/marcos-2-e-3-modelos-de-abertura-de-dados.pdf>.

¹⁸ See Commitment 2, Milestone 4 in: “Brazil’s Open Government Repository: 4th National Action Plan,” Comptroller-General of the Union.

¹⁹ Milestone 5 pertained to expanding each theme presented in Milestone 4. The evidence for the fulfillment of this activity can be attributed to the reference model version available for public consultation. See Commitment 2, Milestone 6 in: “Brazil’s Open Government Repository: 4th National Action Plan,” Comptroller-General of the Union.

²⁰ The public consultation was open from 28 May until 27 July 2020. “Consulta Pública: Modelo de Referência para Publicação de Dados Abertos,” [Public Consultation: Reference Model for Publication of Open Data], Comptroller-General of the Union, <https://www.gov.br/cgu/pt-br/governo-aberto/noticias/2020/5/consulta-publica-modelo-de-referencia-para-publicacao-de-dados-abertos>.

²¹ See Commitment 2 in: “End-of Term Self-Assessment Report,” Comptroller-General of the Union.

²² “Devolutiva da Consulta Pública ao Modelo de Referência para Publicação de Dados Abertos,” [Feedback from the Public Consultation to the Reference Model for Publication of Open Data], Comptroller-General of the Union, 15 September 2020, <https://www.gov.br/cgu/pt-br/governo-aberto/noticias/2020/9/devolutiva-2013-consulta-publica-modelo-de-referencia-para-publicacao-de-dados-abertos>.

²³ “Open Government in Practice: Results of Commitments - Open Data Ecosystem,” Comptroller-General of the Union.

²⁴ “Reference Model for Open Data Publishing is launched,” Comptroller-General of the Union; An expert survey in relation to guidelines for open data at the municipal level was conducted between 13 February and 8 March 2020 with 186 direct contact targets (144 in the first round and an additional 42 through the snowball method) and a total of 60 individual responses from 57 respondents, who had the option to choose from 13 available areas or suggest a new one. See “Open Government in Practice: Results of Commitments - Open Data Ecosystem,” Comptroller-General of the Union.

²⁵ See https://www.gov.br/cgu/pt-br/governo-aberto/a-ogp/planos-de-acao/4o-plano-de-acao-brasileiro/compromisso-2-docs/modelo-de-referencia-de-abertura-de-dados_verso-final-2.pdf.

²⁶ “Open Government in Practice: Results of Commitments - Open Data Ecosystem,” Comptroller-General of the Union.

²⁷ See Commitment 2, Milestone 7 in: “Brazil’s Open Government Repository: 4th National Action Plan,” Comptroller-General of the Union.

²⁸ See https://www.gov.br/cgu/pt-br/governo-aberto/a-ogp/planos-de-acao/4o-plano-de-acao-brasileiro/compromisso-2-docs/marco-9-disseminacao-modelo-referencia_vf.docx. Note: Some of these links are no longer working. The IRM

recognizes that the implantation period concluded in 2021 while the review process was conducted between 2023 and 2024.

²⁹ See Commitment 2 in: “End-of Term Self-Assessment Report,” Comptroller-General of the Union.

³⁰ “Lei nº 11.346, de 15 de Setembro de 2006,” [Law No. 11.345 of 15 September 2006], Civil House of the Presidency of the Republic, 15 September 2006, http://www.planalto.gov.br/ccivil_03/_ato2004-2006/2006/lei/111346.htm.

³¹ See Commitment 4 in: “End-of Term Self-Assessment Report,” Comptroller-General of the Union.

³² See [in Portuguese] <http://www4.planalto.gov.br/consea/aceso-a-informacao/institucional/o-que-e-o-consea>.

³³ “Medida Provisória nº 870, de 1º de Janeiro de 2019,” [Provisional Measure No. 870 of 1 January 2019], General Secretariat of the Presidency of the Republic, 1 January 2019, http://www.planalto.gov.br/ccivil_03/_ato2019-2022/2019/Mpv/mpv870.htm.

³⁴ See Commitment 4 in: “End-of Term Self-Assessment Report,” Comptroller-General of the Union.

³⁵ “Lei nº 13.844 de 18 de Junho de 2019,” [Law No. 13.844 of 18 June 2019], General Secretariat of the Presidency of the Republic, 18 June 2019, <https://legislacao.presidencia.gov.br/atos/?tipo=LEI&numero=13844&ano=2019&ato=159ITT61keZpWT15c>.

³⁶ See Commitment 4 in: “End-of Term Self-Assessment Report,” Comptroller-General of the Union.

³⁷ See Commitment 4 in: “End-of Term Self-Assessment Report,” Comptroller-General of the Union.

³⁸ See Commitment 4 in: “End-of Term Self-Assessment Report,” Comptroller-General of the Union.

³⁹ See Commitment 4 in: “End-of Term Self-Assessment Report,” Comptroller-General of the Union.

⁴⁰ See “Mapeamento de ações de Cursos de Educação à Distância e Produções voltadas a promoção da Segurança Alimentar e Nutricional e o Direito Humano à Alimentação Adequada” in: “Brazil’s Open Government Repository: 4th National Action Plan,” Comptroller-General of the Union, <https://www.gov.br/cgu/pt-br/governo-aberto/a-ogp/planos-de-acao/4o-plano-de-acao-brasileiro/compromisso-4-docs/levantamento-de-cursos-de-ead-sisan.pdf>.

⁴¹ See Commitment 4 in: “End-of Term Self-Assessment Report,” Comptroller-General of the Union.

⁴² See Commitment 4 in: “End-of Term Self-Assessment Report,” Comptroller-General of the Union.

⁴³ SISAN Universidades, “Projeto SISAN Universidades UFRPE-UFPB-UFRN: Lançamento da Cartilha - Você tem fome de quê?” [SISAN Project Universities UFRPE-UFPB-UFRN: Launch of the Booklet - What are you hungry for?], YouTube, 15 October 2020, <https://www.youtube.com/watch?v=cTRljHA0SIw>.

⁴⁴ See Commitment 4 in: “End-of Term Self-Assessment Report,” Comptroller-General of the Union.

⁴⁵ See Commitment 4 in: “End-of Term Self-Assessment Report,” Comptroller-General of the Union.

⁴⁶ “Governo Aberto na Prática: Resultados dos Compromissos - impacto social da regulação da ANTT,” [Open Government in Practice: Results of Commitments - social impact of ANTT regulation], Comptroller-General of the Union, 18 June 2021, <https://www.gov.br/cgu/pt-br/governo-aberto/noticias/2021/6/governo-aberto-na-pratica-resultados-dos-compromissos-impacto-social-da-regulacao-da-antt>.

⁴⁷ Available at <https://conselhodeusuarios.cgu.gov.br/inicio>.

⁴⁸ See Commitment 5 in: “End-of Term Self-Assessment Report,” Comptroller-General of the Union.

⁴⁹ See Commitment 5 in: “4th Brazilian Action Plan,” Comptroller-General of the Union.

⁵⁰ “Decreto nº 10.228, de 5 de Fevereiro de 2020,” [Decree No. 10.228 of 5 February 2020], Secretariat General of the Presidency of the Republic, 5 February 2020, http://www.planalto.gov.br/ccivil_03/_ato2019-2022/2020/decreto/D10228.htm.

⁵¹ “Social impact of ANTT regulation,” Comptroller-General of the Union.

⁵² See <https://conselhodeusuarios.cgu.gov.br/inicio>.

⁵³ See Commitment 5, Meeting on 14 May 2020 in: “Brazil’s Open Government Repository: 4th National Action Plan,” Comptroller-General of the Union; the platform is referred here as Ouvidoria-Geral da União – OGU. See also the recording of the meeting at <https://www.youtube.com/watch?v=-dtKqUjtaE0>.

⁵⁴ See Commitment 5, Meeting on 14 May 2020 in: “Brazil’s Open Government Repository: 4th National Action Plan,” Comptroller-General of the Union.

⁵⁵ See Commitment 5 in: “End-of Term Self-Assessment Report,” Comptroller-General of the Union.

⁵⁶ 4ª Reunião Geral de Coordenadores de Compromisso do 4º Plano de Ação Nacional, 14 May 2020, <https://www.youtube.com/watch?v=-dtKqUjtaE0>.

⁵⁷ “Social impact of ANTT regulation,” Comptroller-General of the Union.

⁵⁸ See Commitment 9 in: “End-of Term Self-Assessment Report,” Comptroller-General of the Union.

⁵⁹ “Comunicado de saída da sociedade civil brasileira do Compromisso 9 do 4º Plano de Ação Nacional em Governo Aberto – OGP,” [Statement on the exit from civil society of Commitment 9 of the 4th National Action Plan], 8 April 2021, <https://www.gov.br/cgu/pt-br/governo-aberto/a-ogp/planos-de-acao/4o-plano-de-acao-brasileiro/compromisso-9-docs/comunicado-saida-sociedade-civil-comp9.pdf>.

⁶⁰ See Commitment 9 in: “End-of Term Self-Assessment Report,” Comptroller-General of the Union.

⁶¹ See Final Implementation Report of 9 December 2020 in: “Brazil’s Open Government Repository: 4th National Action Plan,” Comptroller-General of the Union.

⁶² See Commitment 9 in: “End-of Term Self-Assessment Report,” Comptroller-General of the Union, p. 75.

⁶³ It is worth mentioning that the existence of the National Water Resources Policy of Brazil represented a way to leverage the achievement of its goals. See “Lei nº 9.433, de 8 de Janeiro de 1997,” [Law No. 9.433 of 8 January 1997], Civil House of the Presidency of the Republic, 8 January 1997, http://www.planalto.gov.br/ccivil_03/leis/19433.htm. The policy is operationalized by the National Water and Basic Sanitation Agency at the federal level and by 27 water resources management bodies in the federative units, considering the multiple domains of water as established by the Constitution. It establishes a decentralized system with the participation of various stakeholders at different levels of government. These improvements have facilitated public management and the work practices of civil servants that utilize this data for decision-

making. The commitment included specific milestones for the training of these different actors. The training activities covered various topics, including the presentation of the system and its access methods. They also involved in-person activities and the production of training materials for continuous online learning. Valuable data is available especially at the SNIRH panel, which brings annual situation reports and other useful data to monitor the process of policy implementation. See “Sistema Nacional de Informações sobre Recursos Hídricos,” [National Water Resources Information System], National Water and Basic Sanitation Agency, <https://www.snirh.gov.br/snirh/snirh-1/aceso-tematico/balanco-hidrico>. In the Design Report, the potential impact of the commitment was coded as minor, see: “IRM Brazil Design Report 2018–2020,” Open Government Partnership.

⁶⁴ “Monitoramento 4º Plano de Ação – OGP 5ª Reunião do Compromisso 10,” [Fourth action plan monitoring - Fifth OGP meeting of Commitment 10], Comptroller-General of the Union, 22 January 2021, https://www.gov.br/cgu/pt-br/governo-aberto/a-ogp/planos-de-acao/4o-plano-de-acao-brasileiro/compromisso-10-docs/10-5reuniao_-22-01-2021.pdf.

⁶⁵ “Conjuntura de Recursos Hídricos 2017,” [Water Resources Situation 2017], National Water and Basic Sanitation Agency, 2017, http://www.snirh.gov.br/portal/snirh/centrais-de-conteudos/conjuntura-dos-recursos-hidricos/conj2017_rel-1.pdf.

⁶⁶ “Sistema Nacional de Informações sobre Recursos Hídricos,” National Water and Basic Sanitation Agency, <https://www.snirh.gov.br/snirh/snirh-1/aceso-tematico/balanco-hidrico>.

⁶⁷ Portal FNCBH, “Gonzalo Álvaro Vásquez Fernández e Marcus Fuckner da ANA falam sobre o SNIRH,” [Gonzalo Álvaro Vásquez Fernández and Marcus Fuckner from ANA talk about SNIRH], YouTube, 6 November 2019,

<https://www.youtube.com/watch?v=BHxPdwPr0mo>; “ANA realiza oficina para capacitação e avaliação do SNIRH” [ANA holds workshop for training and evaluation of SNIRH], Comptroller-General of the Union, 1 October 2019, <https://www.gov.br/cgu/pt-br/governo-aberto/noticias/2019/09/ana-realiza-oficina-para-capitacao-e-avaliacao-do-snirh>.

⁶⁸ “Consulta online busca aprimoramento na transparência do SNIRH,” [Online consultation seeks to improve SNIRH transparency], Comptroller-General of the Union, 19 February 2020, <https://www.gov.br/cgu/pt-br/governo-aberto/noticias/2020/consulta-online-busca-aprimoramento-na-transparencia-do-sistema-nacional-de-informacoes-sobre-recursos-hidricos>.

⁶⁹ “Consolidação das respostas - O Sistema Nacional de Informações Sobre Recursos Hídricos (SNIRH),” [Consolidation of responses - The National Information System on Water Resources (SNIRH)], Artigo 19, 2020, <https://www.gov.br/cgu/pt-br/governo-aberto/a-ogp/planos-de-acao/4o-plano-de-acao-brasileiro/compromisso-10-docs/resultados-consulta-online-snirh.pdf>.

⁷⁰ See Commitment 10, Documents, Milestone 5 in: “Brazil’s Open Government Repository: 4th National Action Plan,” Comptroller-General of the Union, <https://www.gov.br/cgu/pt-br/governo-aberto/a-ogp/planos-de-acao/4o-plano-de-acao-brasileiro/compromisso-10-docs/consulta-online-snirh-devolutiva-ana.xlsx>.

⁷¹ See <https://metadados.snirh.gov.br/geonetwork/srv/por/catalog.search#/home>.

⁷² See <https://inde.gov.br/simposio-12-anos/programacao.html>.

⁷³ Aula aberta: O Novo Portal de Metadados da ANA, [Open class: The New ANA Metadata Portal], November 2020, https://www.youtube.com/watch?v=4o9gbSu7Nml&t=2239s&ab_channel=UnBTV.

⁷⁴ See Commitment 10 in: “End-of Term Self-Assessment Report,” Comptroller-General of the Union.

⁷⁵ “Relatório do Marco 7 do Compromisso 10 ‘Governo Aberto e Recursos Hídricos’ do 4º Plano de Ação do Brasil para Governo Aberto,” [Report on Milestone 7 of Commitment 10 ‘Open Government and Water Resources’ of Brazil’s 4th Action Plan for Open Government], Comptroller-General of the Union, <https://www.gov.br/cgu/pt-br/governo-aberto/a-ogp/planos-de-acao/4o-plano-de-acao-brasileiro/compromisso-10-docs/relatoriomarco7.pdf>.

⁷⁶ “ANA lança curso on-line para facilitar o acesso às informações do SNIRH,” [ANA launches online course to facilitate access to SNIRH information], National Water and Basic Sanitation Agency, updated 18 November 2022, <https://www.gov.br/ana/pt-br/assuntos/noticias-e-eventos/noticias/ana-lanca-curso-on-line-para-facilitar-o-aceso-as-informacoes-do-snirh>.

III. Multi-Stakeholder Process

3.1. Multi-stakeholder process throughout action plan implementation

In 2017, OGP adopted the OGP Participation and Co-Creation Standards intended to support participation and co-creation by civil society at all stages of the OGP cycle. All OGP participating countries are expected to meet these standards. The standards aim to raise ambition and quality of participation during development, implementation, and review of OGP action plans.

OGP’s Articles of Governance also establish participation and co-creation requirements a country or entity must meet in their action plan development and implementation to act according to the OGP process. **Brazil did not act contrary to OGP process.**

Please see Section 3.2 for an overview of Brazil’s performance implementing the Co-Creation and Participation Standards throughout the action plan implementation.

Table [3.2]: Level of Public Influence

The IRM has adapted the International Association for Public Participation (IAP2) “Spectrum of Participation” to apply it to OGP.¹ In the spirit of OGP, most countries should aspire to “collaborate.”

Level of public influence		During development of action plan	During implementation of action plan
Empower	The government handed decision-making power to members of the public.		
Collaborate	There was iterative dialogue AND the public helped set the agenda.	✓	✓
Involve	The government gave feedback on how public inputs were considered.		
Consult	The public could give inputs.		
Inform	The government provided the public with information on the action plan.		
No Consultation	No consultation		

As stated in the IRM Design Report, both government and civil society stakeholders played crucial institutional roles in the administration of Brazil’s OGP process. The Inter-Ministerial Committee on Open Government (CIGA) and the Executive Group of CIGA acted as government representatives, while civil society is represented by the Civil Society Working Group (CS-WG). Though the CS-WG has a consultative role by mandate, in practice, its function is more collaborative, actively participating in co-creating the consultation process and monitoring the implementation.

The procedural aspects of the OGP process were well-organized and transparent. Regular meetings of government and civil society groups were held, and detailed documentation of these meetings was made available online. Each commitment had a dedicated monitoring group, with one leader from civil society and another from the government. These groups

ensured remote participation for all meetings, and the quality of remote engagement was validated by an IRM researcher who attended three meetings. Minutes of all meetings were published on the country's OGP website, accessible in open and proprietary data formats.

Developing the action plan commitments involved active participation from representatives of both civil society and the government. The government employed a meticulous methodology during the implementation phase, which included periodic follow-up meetings with both the government and the CS-WG. During these meetings, milestone developments were reviewed, and rapporteurs from each sector provided valuable comments.

Furthermore, the commitment text resulted from a transparent, participative, and accountable process jointly run by the government and civil society. Interviews with individuals from both the government (CGU) and civil society (CS-WG) confirmed the effectiveness of this collaboration. The themes and milestones of the commitments reflected the interests of all parties involved in the process.

All stages and documents related to the OGP were made accessible to the public, ensuring a transparent decision-making process. According to a representative from civil society, both online and offline stages contributed significantly to the final successful outcome. Despite some commitment objectives not being achieved, largely due to the political context that did not favor citizen engagement at the time, this cooperative and inclusive approach in consultation and implementation has led to an OGP process that is truly participatory. It reflects the collective efforts to promote open governance in Brazil.

As highlighted in specific milestones of the implemented commitments, two major factors posed challenges to the implementation process and hindered effective social participation in the stages of commitment implementation. The first factor was the pandemic, which prevented in-person gatherings for implementing the product's milestones. The second factor was the political context, which introduced decrees and other normative instruments that significantly impeded the progress of the work, even collaboratively. The most notable example of these obstacles is related to Commitment 4, concerning the strengthening of public oversight over the Food and Nutrition Security National Plan. The CONSEA, the coordinating council responsible for the commitment's milestones, was dissolved by a provisional measure and later reestablished. Due to these two factors, the level of engagement between civil society and the government could not be improved.

3.2 Overview of Brazil's performance throughout action plan implementation

Key:

- Green = Meets standard
- Yellow = In progress (steps have been taken to meet this standard, but it is not met)
- Red = No evidence of action

Multi-stakeholder Forum	During Development	During Implementation
Ia. Forum established: The OGP National Steering Committee oversaw the co-creation process of the action plan. ²	Green	Green
Ib. Regularity: The OGP National Steering Committee met regularly during the co-creation process, meeting the OGP standards that require that the forums meet at least once every quarter. ³	Green	Green

1c. Collaborative mandate development: Members of the forum jointly develop its remit, membership, and governance structure. ⁴	Green	Green
1d. Public mandate: Information on the forum's remit, membership, and governance structure is available on the OGP website/page. ⁵	Green	Green
2a. Multi-Stakeholder: The forum includes both governmental and non-government representatives. ⁶	Green	Green
2b. Parity: The forum included an even balance of government and non-government representatives. ⁷	Green	Green
2c. Transparent selection: Non-government members of the forum are selected through a fair and transparent process. ⁸	Green	Green
2d. High-level government representation: The forum included high-level representatives with decision-making authority from government. ⁹	Green	Green
3a. Openness: The forum accepted input and representation on the action plan implementation from any civil society and other stakeholders outside the forum. ¹⁰	Green	Green
3b. Remote participation: There were opportunities for remote participation in meetings and events. ¹¹	Green	Green
3c. Minutes: The OGP forum or the government proactively communicated and reported back on its decisions, activities, and results to wider government and civil society stakeholders. ¹²	Green	Green

Key:

- Green = Meets standard
- Yellow = In progress (steps have been taken to meet this standard, but it is not met)
- Red = No evidence of action

Action Plan Implementation	
4a. Process transparency: There is a national OGP website/webpage with regular updates (i.e., at least every six months) on the progress of commitments, including progress against milestones, reasons for any delays, next steps. This is in addition to publishing a self-assessment report. ¹³	Green
4b. Communication channels: The website/web page has a feature to allow the public to comment on action plan progress updates. ¹⁴	Green
4c. Engagement with civil society: The government held at least two open meetings with civil society to discuss the implementation of the NAP. ¹⁵	Green

4d. Cooperation with the IRM: The government shared IRM Design report with other government institutions and stakeholders to encourage input during the public comment phase. ¹⁶	Green
4e. MSF engagement: The multi-stakeholder forum monitored and deliberated on how to improve the implementation of the NAP. ¹⁷	Green
4f. MSF engagement with self-assessment report: The government submitted its end of term self-assessment report to the national multi-stakeholder forum for comments and feedback on the content of the report. ¹⁸	Green
4g. Repository: The forum documented, collected, and published a repository on the domestic OGP website in line with IRM guidance . ¹⁹	Green

¹ “IAP2’s Public Participation Spectrum,” International Association for Public Participation, 2014, https://cdn.ymaws.com/www.iap2.org/resource/resmgr/pillars/Spectrum_8.5x11_Print.pdf.

² Otavio Castro Neves (Comptroller-General of the Union), interview by IRM researcher, 17 November 2023.

³ Neves, interview, 17 November 2023.

⁴ Otavio Castro Neves (Comptroller-General of the Union), interview by IRM researcher, 22 August 2023.

⁵ “Comitê Interministerial de Governo Aberto (CIGA),” Comptroller-General of the Union, <https://www.gov.br/cgu/pt-br/governo-aberto/governo-aberto-no-brasil/comite-interministerial>; “Segundo Grupo de Trabalho da Sociedade Civil (Second CSWG),” Comptroller-General of the Union, <https://www.gov.br/cgu/pt-br/governo-aberto/governo-aberto-no-brasil/grupo-de-trabalho-da-sociedade-civil/portaria-oficializa-a-composicao-do-novo-gt-tematico-da-sociedade-civil>.

⁶ “Comitê Interministerial de Governo Aberto (CIGA),” Comptroller-General of the Union; “Segundo Grupo de Trabalho da Sociedade Civil (Second CSWG),” Comptroller-General of the Union.

⁷ The CIGA is composed of 15 ministries, and the second CSWG was formed by 7 organizations, see: “Segundo Grupo de Trabalho da Sociedade Civil (Second CSWG),” Comptroller-General of the Union; “Segundo Grupo de Trabalho da Sociedade Civil (Second CSWG),” Comptroller-General of the Union. Nevertheless, the Co-creation workshops for the fourth action plan had equal participation between civil society and government, see: “Oficinas de Cocriação - 4º Plano de Ação,” [Co-creation Workshops - 4th Action Plan], Comptroller-General of the Union, updated 17 June 2020, <https://www.gov.br/cgu/pt-br/governo-aberto/a-ogp/planos-de-acao/4o-plano-de-acao-brasileiro/oficinas-de-cocriacao-4-o-plano-de-acao>.

⁸ Neves, interview, 22 August 2023. See also “Second CSWG Portaria nº 3.414/2018 and Edital nº 1/2018,” Comptroller-General of the Union, <https://www.gov.br/cgu/pt-br/governo-aberto/governo-aberto-no-brasil/grupo-de-trabalho-da-sociedade-civil/portaria-oficializa-a-composicao-do-novo-gt-tematico-da-sociedade-civil>.

⁹ For the fourth action plan, the CIGA as the government representative body of the forum was composed of 15 ministries and was coordinated by CGU, see “Decreto nº 10.160/2019,” Comptroller-General of the Union, <http://pesquisa.in.gov.br/imprensa/jsp/visualiza/index.jsp?data=10/12/2019&jornal=515&pagina=3&totalArquivos=181>.

¹⁰ The openness of the process is described in: “4º Plano de Ação Brasileiro,” [4th Brazilian Action Plan], Comptroller-General of the Union, <https://www.gov.br/cgu/pt-br/governo-aberto/a-ogp/planos-de-acao/4o-plano-de-acao-brasileiro>.

¹¹ Public consultation was done on the website on 4–22 April 2018 and 27 April–6 May 2018, see <https://www.gov.br/cgu/pt-br/governo-aberto>; Neves, interview, 17 November 2023; see Definition of Themes in: “4th Brazilian Action Plan,” Comptroller-General of the Union.

¹² All the information regarding the process is clearly present at CGU’s website, especially at: <https://www.gov.br/cgu/pt-br/governo-aberto/a-ogp/planos-de-acao/4o-plano-de-acao-brasileiro/oficinas-de-cocriacao-4-o-plano-de-acao>. There is also a page in the CGU’s website that shows statistics of assessment of the available information. At: <https://repositorio.cgu.gov.br/handle/1/46277/statistics>.

¹³ “4th Brazilian Action Plan,” Comptroller-General of the Union.

¹⁴ Neves, interview, 17 November 2023.

¹⁵ “4º Plano de Ação Brasileiro - Monitoramento e execução,” [4th Brazilian Action Plan - Monitoring and execution], Comptroller-General of the Union, last updated 21 December 2021, <https://www.gov.br/cgu/pt-br/governo-aberto/a-ogp/planos-de-acao/4o-plano-de-acao-brasileiro/4o-plano-de-acao-brasileiro-monitoramento-e-execucao>.

¹⁶ Neves, interview, 17 November 2023.

¹⁷ “4th Brazilian Action Plan - Monitoring and execution,” Comptroller-General of the Union.

¹⁸ Neves, interview, 17 November 2023.

¹⁹ “4th Brazilian Action Plan,” Comptroller-General of the Union.

IV. Methodology and Sources

National researchers conduct research for the IRM reports. All IRM reports undergo a quality control process led by IRM staff to ensure that the highest standards of research and due diligence have been applied.

The International Experts Panel (IEP) of the IRM oversees the quality control of each report. The IEP is composed of experts in transparency, participation, accountability, and social science research methods.

The International Experts Panel overseeing this cycle of reports were:

- César Cruz-Rubio
- Mary Francoli
- Brendan Halloran
- Jeff Lovitt
- Juanita Olaya

This review process, including the procedure for incorporating comments received, is outlined in greater detail in Section III of the Procedures Manual¹ and in Brazil's Design Report 2018–2020.

About the IRM

The Open Government Partnership (OGP) aims to secure concrete commitments from governments to promote transparency, empower citizens, fight corruption, and harness new technologies to strengthen governance. OGP's Independent Reporting Mechanism (IRM) assesses development and implementation of national action plans to foster dialogue among stakeholders and improve accountability.



¹ "IRM Procedures Manual, v3," Open Government Partnership, <https://www.opengovpartnership.org/documents/irm-procedures-manual>.

Annex I. IRM Indicators

The indicators and methods used in the IRM research can be found in the IRM Procedures Manual.¹ A summary of key indicators the IRM assesses is below.

- **Verifiability:**
 - Not specific enough to verify: As written in the commitment, do the objectives stated and actions proposed lack sufficient clarity and specificity for their completion to be objectively verified through a subsequent assessment process?
 - Specific enough to verify: As written in the commitment, are the objectives stated and actions proposed sufficiently clear and specific to allow for their completion to be objectively verified through a subsequent assessment process?
- **Relevance:** This variable evaluates the commitment's relevance to OGP values. Based on a close reading of the commitment text as stated in the action plan, the guiding questions to determine the relevance are:
 - Access to Information: Will the government disclose more information or improve the quality of the information disclosed to the public?
 - Civic Participation: Will the government create or improve opportunities or capabilities for the public to inform or influence decisions or policies?
 - Public Accountability: Will the government create or improve public facing opportunities to hold officials answerable for their actions?
- **Potential impact:** This variable assesses the *potential impact* of the commitment, if completed as written. The IRM researcher uses the text from the action plan to:
 - Identify the social, economic, political, or environmental problem.
 - Establish the status quo at the outset of the action plan.
 - Assess the degree to which the commitment would impact performance and tackle the problem if implemented.
- **Completion:** This variable assesses the commitment's implementation and progress. This variable is assessed at the end of the action plan cycle, in the *IRM Implementation Report*.
- **Did It Open Government?** This variable attempts to move beyond measuring outputs and deliverables to looking at how the government practice, in areas relevant to OGP values, has changed as a result of the commitment's implementation. This variable is assessed at the end of the action plan cycle, in the IRM Implementation Report.

Results-oriented commitments

A potentially starred commitment has more potential to be ambitious and to be implemented. A good commitment design is one that clearly describes the:

1. **Problem:** What is the economic, social, political, or environmental problem? Rather than describing an administrative issue or tool (e.g., 'Misallocation of welfare funds' is more helpful than 'lacking a website')?
2. **Status quo:** What is the status quo of the policy issue at the beginning of an action plan (e.g., "26 percent of judicial corruption complaints are not processed currently")?
3. **Change:** Rather than stating intermediary outputs, what is the targeted behavior change expected from the commitment's implementation (e.g., "Doubling response rates to information requests" is a stronger goal than "publishing a protocol for response")?

Starred commitments

One measure, the “starred commitment” (★), deserves further explanation due to its particular interest to readers and usefulness for encouraging a race to the top among OGP-participating countries/entities. To receive a star, a commitment must meet several criteria:

- The commitment’s design should be **Verifiable**, **Relevant** to OGP values, and have **Transformative** potential impact. As assessed in the Design Report.
- The commitment’s implementation must be assessed by IRM Implementation Report as **Substantial** or **Complete**.

This variable is assessed in the IRM Implementation Report at the end of the action plan cycle.

¹ “IRM Procedures Manual, v3,” Open Government Partnership, <https://www.opengovpartnership.org/documents/irm-procedures-manual>.