

# Independent Reporting Mechanism

Action Plan Review:  
Brazil 2023–2027

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Open  
Government  
Partnership



Independent  
Reporting  
Mechanism

## Table of Contents

Section I: Overview	2
Section II: Promising Commitments	4
Section III. Methodology and IRM Indicators	12
Annex 1. Commitment by Commitment Data	14
Annex 2: Action Plan Co-Creation	15

## Section I: Overview

**Brazil’s sixth action plan includes eight commitments prioritized by government and civil society. Commitments to promote transparency and citizen oversight in infrastructure projects, and to increase transparency of scientific research both show substantial potential to deliver results. As Brazil’s first four-year action plan, the mid-point refresh process would help to further specify and enhance the ambition of other commitments.**

Brazil’s sixth action plan comprises eight commitments. It introduces new policy reforms related to citizen oversight of infrastructure projects, improving the quality of ethnic and race related data, digital inclusion for the elderly, improved services for family farming, and social participation and popular education across territories in the country. Three commitments to enhance the publication and use of open data—addressing corruption, promoting open science, and ensuring compliance with access to information legislation—have been carried over from previous plans.

Commitments 1 and 3 have substantial potential for results and are reviewed in further depth in this review. Commitment 1 seeks to improve the accessibility and usability of information on public infrastructure projects and institutionalize spaces for social participation with stakeholders being involved in the selection, planning, execution, and monitoring of public infrastructure cycle. Aside from safeguarding against corruption, enhancing open government values in public infrastructure projects are crucial given the importance of such projects on communities and people’s lives. Commitment 3 continues a successful line of open science commitments by seeking to deliver clear national policies and guidelines to advance transparency in scientific research. It seeks to raise awareness, build capacity, and continue unfinished actions from past commitments, all while building on the strength of the participatory focus.<sup>1</sup>

Commitment 5 is also a promising commitment aimed at improving the quality and availability of ethnic and racial data collected to monitor and strengthen affirmative action policies. Given the inconsistency between Brazil’s ethnic and racial diversity and their underrepresentation in decision-making, this could contribute to greater transparency and social accountability.

The co-creation of the action plan encompassed consultations with a significant geographic reach and notable proactive awareness raising effort. While noting that improvements could still be made in future co-creation processes, civil society stakeholders recognized positive improvement in the quality of dialogue, geographical outreach, and diversity of voices.<sup>2</sup>

A public consultation to propose priority themes received 126 contributions along with 58 contributions received from a parallel process for public institutions. Further consolidation and

### AT A GLANCE

Participating since 2011  
Number of commitments: 8

#### Overview of commitments:

- Commitments with an open government lens: 8 (100%)
- Commitments with substantial potential for results: 2 (25%)
- Promising commitments: 3

#### Policy areas:

Carried over from previous action plans:

- Open data
- Anti-corruption
- Open science
- Access to information

Emerging in this action plan:

- Ethnic and racial affirmative action data
- Digital inclusion for the elderly
- Family farming services

Compliance with OGP minimum requirements for co-creation: Yes

prioritization of these initiatives resulted in four civil society priority topics of anti-corruption, access to information, transparency and participation in infrastructure, and collaborative science.<sup>3</sup> On the government side, the priority topics include service improvement in consultation with users, digital education for the elderly, social participation across national territories, and open ethnic-racial data for affirmative action.<sup>4</sup> These topics were drafted and refined in 16 in-person co-creation workshops until a consensus was reached for the plan's final eight commitments.<sup>5</sup> Women accounted for 60 percent of participants throughout the co-creation workshops.<sup>6</sup>

Civil society stakeholders highlighted that the action plan overlooks crucial policy areas such as environmental sustainability.<sup>7</sup> Environmental themes did not achieve enough popular support during the action plan development process to become commitments.<sup>8</sup> Given Brazil's vast and critical natural resources, the documented erosion of environmental protections by the past administration,<sup>9</sup> and inclusion of environmental commitments in prior action plans, the midterm review could prioritize addressing this gap. Overall, an Imaflora representative recognized that the current administration has expanded environmental policy spaces compared to the previous administration.<sup>10</sup>

To optimize implementation, it is crucial to maintain active and consistent engagement between government and civil society. The Interministerial Committee for Open Government (CIGA) needs to play an active role in ensuring that public institutions remain engaged and that civil servants are provided with the technical support required to deliver open government results.

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<sup>1</sup> Bianca Amaro, Washington Carvalho, and Priscila Sena (Brazilian Institute of Information in Science and Technology – IBICT), interview by IRM researcher, 2 February 2024; Otavio Castro Neves (Comptroller-General of the Union), interview by IRM researcher, 13 March 2024.

<sup>2</sup> Danielle Bello (Open Knowledge Brasil), interview by IRM researcher, 13 March 2024; Paula Schommer (Council of Transparency, Integrity, and Anti-Corruption), interview by IRM researcher, 12 March 2024.

<sup>3</sup> For more information on the process, refer to Annex 2: Action Plan Co-Creation.

<sup>4</sup> For more information, see: <https://www.gov.br/cgu/pt-br/governo-aberto/a-ogp/planos-de-acao/6deg-plano-de-acao-brasileiro/devolutiva-temas-governo.pdf>.

<sup>5</sup> Neves, interview.

<sup>6</sup> See “Brazil 6<sup>th</sup> National Action Plan on Open Government,” *Comptroller-General of the Union*, 2023, [https://www.opengovpartnership.org/wp-content/uploads/2024/01/Brazil\\_Action-Plan\\_2023-2027\\_December\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2024/01/Brazil_Action-Plan_2023-2027_December_EN.pdf). The IRM reviewed photographic evidence of 3 out of 16 workshop meetings and confirmed that women's participation tended to be the majority. See: <https://www.gov.br/cgu/pt-br/governo-aberto/a-ogp/planos-de-acao/6deg-plano-de-acao-brasileiro/Oficinas-cocriacao-6-plano-acao-nacional>.

<sup>7</sup> Bello, interview; Schommer, interview.

<sup>8</sup> See Annex 2: Action Plan Co-Creation.

<sup>9</sup> Robbie Gramer, “Who owns the Earth’s Lungs? The battle to save the Amazon goes beyond Brazil,” *Foreign Policy* (9 December 2022), <https://foreignpolicy.com/2022/12/09/amazon-rainforest-climate-change-deforestation-bolsonaro-lula>.

<sup>10</sup> Bruno Vello (Imaflora), interview by IRM researcher, 23 September 2024.

## Section II: Promising Commitments

The following review looks at the three commitments that the IRM identified as having the potential to realize the most promising results. Promising commitments address a policy area that is important to stakeholders or the national context. They must be verifiable, have a relevant open government lens, and have modest or substantial potential for results. This review also provides an analysis of challenges, opportunities, and recommendations to contribute to the learning and implementation process of this action plan.

**Table 1. Promising commitments**

Promising Commitments
<b>Commitment 1.</b> Transparency and social participation in public infrastructure policies
<b>Commitment 3.</b> Collaborative practices for science and technology
<b>Commitment 5.</b> Ethnic and racial data for affirmative action

### Commitment 1: Transparency and social participation in public infrastructure policies

For a complete description, see Commitment 1 in [Brazil 2023–2027 action plan](#).

#### Context and objectives

The infrastructure sector has one of the highest incidences of corruption in Brazil. A notable example of this is the Odebrecht construction company corruption scandal of the 2010s, which was uncovered in Brazil and then extended to 10 other countries.<sup>1</sup> Such practices often go unpunished due to a lack of transparency and social accountability. An estimate by the United Nations suggests that corruption reduces the value of a public contract by 10 to 25 percent.<sup>2</sup>

This commitment aims to enhance transparency and citizen engagement in infrastructure policies by improving access to information and institutionalizing spaces for public participation in all phases of the infrastructure project cycle. Proposed by civil society, this commitment was the most-voted during consultation<sup>3</sup> and was submitted for the Open Gov Challenge.

To address these issues, civil society entities and governmental oversight bodies have implemented mechanisms to promote transparency in bidding, contracting, and analyzing the social and environmental impacts of major infrastructure projects. For example, the Institute of Public Works Audit (IBRAOP)<sup>4</sup> and Rui Barbosa Institute lead an initiative to provide guidelines for audit teams to verify and analyze the existence and quality of integrity and transparency mechanisms throughout an infrastructure project's life cycle.<sup>5</sup> Other examples include digital platforms such as the federal government's transparency portal<sup>6</sup> and the [obras.gov](#) portal.<sup>7</sup> Yet, information gaps and integration challenges with government data remain, which hinder effort to improve transparency. Public participation in large-scale projects also remains limited and infrequent, which limit involvement in key phases of the decision-making process.<sup>8</sup>

#### Potential for results: Substantial

This commitment has substantial potential to enhance transparency and strengthen citizen oversight of the infrastructure sector. Activities to increase access to information would broaden the scope of information on [obras.gov](#). According to a 2023 survey by the Federal Court of Accounts (TCU), the platform lacks essential data such as information regarding projects and public works from investment programs.<sup>9</sup> Commitment activities to assess best practices (Milestone 1) and diagnose the current state of infrastructure transparency (Milestone 9) would further help identifying areas for improvement and potential solutions.<sup>10</sup> Milestone 7 on clear and accessible language in relation to infrastructure projects would address the issue of complex legal jargons. Creating proposals for regulatory change and implementing the relevant training of officials, as well as increasing the scope of information on [obras.gov](#) to publish comprehensive information on the selection, planning, execution, and monitoring of all federal infrastructure projects would result in greater public access to information than before.

The greatest potential for substantial results lies in the participatory elements of this commitment. Milestone 5 to establish a permanent space for dialogue between the public and the government

on infrastructure investment plans and projects would address the problem of limited public involvement in key phases of the decision-making process with a new and permanent feature. Introducing regulatory changes to enhance social participation at key stages would also ensure that these improvements are sustained beyond the timeframe of this action plan. According to a Transparência Brasil representative, this commitment would engage civil society organizations in federal infrastructure policies to reduce corruption risks in all stages.<sup>11</sup> This would be a significant change in practice towards greater collaboration and public oversight of infrastructure projects compared to the more adversarial dynamic which currently exists when there are concerns regarding infrastructure policies.

Another aspect of this commitment which points to substantial potential for results is the milestone to propose improvements in transparency and social control of investments in Brazil's Growth Acceleration Program (Milestone 6), which was relaunched in 2023 and is expected to have R\$ 1.3 trillion (approximately US\$231 billion) budget for infrastructure projects by 2026.<sup>12</sup>

### **Opportunities, challenges, and recommendations during implementation**

The commitment benefits from widespread stakeholders' support. It was voted as the most important topic during consultation and the government considers it one of the action plan's flagship topics.<sup>13</sup> Nevertheless, the IRM has identified some challenges that the commitment needs to overcome to achieve its potential impact.

The tight timeframe between the Growth Acceleration Program funds and commitment activities present a major challenge. Incorporating civil society inputs into the assessment and recommendation process of current and best practices could ensure government responses that reflect the priorities of those who are most likely to participate in the oversight of infrastructure projects. There also needs to be clarity in the scope and functions of the permanent space for dialogue to ensure it is an impactful mechanism. Key questions might include the location, participants, metrics of its permanent status, and ensuring uptake. The IRM recommends to:

- **Leverage existing knowledge to streamline the implementation of improvements to [obras.gov](https://obras.gov)**, which may include the guidelines elaborated by Institute of Public Works Auditing (IBRAOP)<sup>14</sup> and recommendations of the Federal Court of Accounts (TCU). This could help with standardizing procedures such as indicating the justification and measures for resuming (or not) such projects, which are then published on [obras.gov](https://obras.gov).<sup>15</sup> In 2023, the Growth Acceleration Program reported that 41% of public works fell under the “interrupted works” category.<sup>16</sup>
- To ensure improvements in transparency and effective mechanisms for participation, the Comptroller-General of the Union (CGU) could **ensure civil society and government participation in workshops to formulate solutions** to the identified challenges.<sup>17</sup> This could be most effective in establishing the rules, responsibilities, scope, and functions of the permanent space for dialogue. As lead institution for the Growth Acceleration Program,<sup>18</sup> Office of the Chief of Staff of the President could also be invited to encourage its participation in delivering concrete and impactful social participation in important infrastructure projects. As recent examples show in the transportation sector, discussions with civil society on strengthening mechanisms and decision-making processes could be replicated and expanded to ensure the inclusion of local institutions and civil society.<sup>19</sup>
- At the midpoint refresh of the action plan period, commitment implementers need to further **specify any unfinished activities and clarify uncertainties over the scope of transparency or depth of participatory mechanisms**. For example, Milestone 3 on improving the [obras.gov](https://obras.gov) platform could be more specific on what fields should be opened at each of the listed stages (selection, planning, execution, and monitoring). The Open Contracting for Infrastructure Data Standard,<sup>20</sup> which provides specific guidance on project-level data to be disclosed for each stage, could serve as a reference or implementation model.
- **Implement an ‘open by design’ approach** to the disclosure of infrastructure projects data across all stages.<sup>21</sup> Milestones related to training (4 and 8) could also be more specific in terms of the target audience. Stakeholders could include activities to support citizen feedback mechanisms in the [obras.gov](https://obras.gov) platform to enable them to report irregularities and violations, similar to relevant practices in Ukraine.<sup>22</sup>

### **Commitment 3: Collaborative practices for science and technology**

For a complete description, see Commitment 3 in [Brazil 2023–2027 action plan](#).

#### **Context and objectives**

The theme of open science has been featured prominently in recent national action plans. Open science offers an improved access to research—predominantly funded by public funds—<sup>23</sup> typically hosted on restricted platforms which in turn has helped advance civic participation in research agendas and enhanced public accountability. Brazil’s fourth action plan aimed to establish governance and support mechanisms for open scientific data through the creation of governance structures, data repositories, and maturity indicators for open data.<sup>24</sup> In the fifth action plan, the goal was to encourage open science by proposing new evaluation mechanisms for the scientific research community in Brazil.

In the sixth action plan, this commitment focuses on the political and policy dimensions to promote open science practices through the development of a National Open Science Policy for the first time as well as considering open science as part of the National Science, Technology, and Innovation Strategy (ENCTI) and elaborating national guidelines. The commitment also advances other actions such as identifying and supporting strategic areas, existing initiatives, and budget actions as well as monitoring open science practices, raising awareness, developing and disseminating educational resources, and creating incentives for adopting these practices.<sup>25</sup>

#### **Potential for results: Substantial**

This commitment has the potential to deliver substantial results. While many activities build on previous commitments, this action plan proposes the development of a National Open Science Policy for the first time with an implementation plan to promote open science. Government stakeholders have highlighted the lack of clear national policies and guidelines as the main obstacle to advancing open science,<sup>26</sup> which is addressed by several commitment milestones.

Milestone 1 aims to ensure practices of collaboration, transparency, and reproducibility of scientific products are included in the 2024–2030 National Science and Technology Strategy (ENCTI). Milestone 2 encourages ongoing debate to develop national guidelines for open science, and Milestone 7 refers to the creation of a National Open Science Policy aligned with the national strategy. These actions would provide a supportive and clear framework that enables open science to progress beyond past voluntary efforts. Ultimately, through these measures, the commitment seeks to improve the quality, transparency, and depth of collaboration and engagement of the public with scientific research.

Milestones 9 and 12 focus on raising awareness and building capacity to improve the successful implementation of open science practices. According to a representative of the public research institution Brazilian Agricultural Research Corporation (Embrapa), one of the most significant challenges for open science has been raising awareness within the academic community about the importance of creating and implementing instruments that promote open science.<sup>27</sup>

To foster implementation, Milestone 8 aims to produce action plans to operationalize open science in line with the new National Open Science Policy. Milestone 13 focuses on creating incentive mechanisms for its adoption. These actions enable strategic planning and an actionable roadmap to follow. Furthermore, Milestones 1 and 5 would align the commitment with the ENCTI as well as identify existing and develop new budget plans related to open science respectively. Along with Milestone 11 to identify existing initiatives in need of support, these activities point towards sustained implementation of open science via both the national strategy and policy.

#### **Opportunities, challenges, and recommendations during implementation**

Past commitments provide a solid base on which to build via the resources developed, such as materials, networks, repositories, evaluation metrics, and monitoring indicators. According to government stakeholders, the existing network and collaboration that has arisen from previous action plans provide a solid basis to successfully implement this commitment.<sup>28</sup> These resources and political will can be leveraged in milestones related to monitoring, dissemination of material, awareness raising, and identification of initiatives and strategic areas.

In addition, the IRM recommends the following to ensure the commitment achieves its potential:

- **Establish participatory mechanisms for developing the National Open Science Policy**, which is not currently specified. Some mechanisms that can be developed to pursue

broader co-creation of the policy are consultations and focus groups with researchers and universities beyond the commitment stakeholders as well as organizing discussions in forums such as the National Conference of Science, Technology, and Innovation.

- **Use the experience of previous commitments to ensure effective participation amongst participating institutions.** With 16 institutions currently listed in the current commitment, open science has consistently drawn ample participation. While this has been a strength, representatives from both Embrapa and the Institute of Information in Science and Technology (IBICT) noted the need for improved coordination and communication.<sup>29</sup> Coordinating institutions could lead on ensuring clear rules and lines of communication as well as timelines and a division of responsibilities so that all participants can engage effectively. Stakeholders need to have influence over their respective institutions' open science initiatives and time from their existing responsibilities to advance the commitment milestones. As such, **greater institutional support and capacity** for individuals with busy schedules are also necessary to unblock delays in taking actions and coordinating activities.<sup>30</sup>
- The ambition of the commitment could be further improved by **incorporating an accountability mechanism into the monitoring of open science**, especially as a large portion of research in Brazil is publicly funded. A new milestone to establish a mechanism that outlines the mechanism and what to monitor (e.g., open scientific data, access to articles, citizen science, adoption of alternative metrics, and number of articles with public funds disclosure) could be explored during the midpoint refresh.

## **Commitment 5: Ethnic and racial data for affirmative action**

For a complete description, see Commitment 5 in [Brazil 2023–2027 action plan](#).

### **Context and objectives**

The commitment seeks to produce, process, and provide standardized, high-quality racial and ethnic data. The overall aim is to enhance accessibility and granularity, and to support the creation, implementation, and monitoring of ethnic and racial affirmative action.<sup>31</sup> The Ministry of Racial Equality proposed this theme, which the government selected as one of its four priorities for the action plan.<sup>32</sup>

Standardized, readily accessible, and user-friendly ethnic and racial data are crucial for the development of public policies aimed at reducing inequalities between Brazil's white, black, brown, and mixed-race populations. Black and brown Brazilians account for 55.9% of the population,<sup>33</sup> but unequal representation and opportunities are common. For instance, in the last three elections for the Federal Senate, only 24 out of 108 contested seats (22%) were occupied by individuals who identified as black on their candidacy registration.<sup>34</sup> With only about 14% of justices across Brazil identify as black,<sup>35</sup> an AqualtuneLab representative underscores that the same underrepresentation is also a significant problem in the judiciary.<sup>36</sup>

### **Potential for results: Modest**

This commitment has modest potential for results. It plans to map the data ecosystem and develop a database of ethnic and racial affirmative action policies, encourage public bodies to use the database and update it with standardised information, launch an interactive portal (observatory) to bring together successful initiatives in the application of Law No. 10.639/2023, and hold a National Affirmative Action Forum to bring public officials together to help them construct affirmative action policies. Other activities seek to raise awareness, train officials, and provide guidance on collecting and using ethnic and racial data.

Many of these activities would begin to address deficiencies such as insufficient data, lack of integration and standardization, and limited knowledge or interest in ethnic and racial data,<sup>37</sup> which have limited the implementation and monitoring of affirmative action in Brazil. The commitment activities encourage compliance and nudge behaviors through guidance and sharing best practices. This may serve as reference points and roadmaps for collecting, standardizing, and processing ethnic and racial data, though not mandatory.

Other milestones seek to evaluate the implementation of affirmative action policies, encourage the availability of data on affirmative action policies, and monitor the implementation of Law No.



10.639/2003 on the compulsory teaching of Afro-Brazilian History and Culture in schools. These deliverables increase the avenues for holding government actions to account and promote vital educational spaces that are sensitive of Brazil’s racial diversity.

By improving the quality of ethnic and racial data available to the public and policymakers, this commitment could contribute towards and strengthen public policies aimed at inclusivity and access for black, mixed-race, and indigenous populations. Alongside previous efforts to implement diverse systems, programs, evaluations, and decrees related to ethnic and racial data in Brazil,<sup>38</sup> the commitment may help to consolidate efforts and make them more efficient and effective. However, this can only happen when the whole system of data collection is standardized. As part of a four-year action plan, there is time to implement more ambitious activities that would ensure—not just encourage—compliance with the broad objectives of the commitment. Potentially, the decisions of the Central Data Governance Committee, which has the mandate to deliberate on national data guidelines, including with regard to the recommended level of openness, could lead to more substantial results.<sup>39</sup> The development of various pieces of guidance for universities and federal institutes, heteroidentification boards, and the federal public administration could have positive effects on practices, although the non-mandatory nature effectively limits its potential for results.<sup>40</sup>

### **Opportunities, challenges, and recommendations during implementation**

The commitment is especially relevant and carries significant importance to government actors as reflected by its selection as a top four priority out of the 58 topics suggested by government stakeholders during co-creation. While it is the only commitment involving the Federal Senate, the lack of integration between government information systems is expected to be an obstacle, especially considering its limited aim of delivering an integration pilot, without plans to scale up.

To address potential challenges in implementation, the IRM recommends to:

- Given its novelty on Brazil’s OGP process, actions and milestones must be **defined collaboratively to set the commitment on a path for success**. The midpoint refresh process could offer an opportunity to further specify the commitment goals. For example, Milestone 11 proposes training public agents on ethnic and racial data but has no explicit targets e.g., which government agencies, levels of administration, or number of people to be trained. Similarly, Milestone 10 seeks to evaluate the implementation of affirmative action but unclear if these relate to the existing decrees and laws, new actions, or both.
- The proposed solution of creating an Integrated System of Ethnic-Racial Affirmative Actions is not included as a commitment milestone, although Milestone 8 refers to a data integration pilot. However, it is not clear if this pilot refers to the aforementioned system/solution nor is it sufficiently described on what it aims to achieve. Additionally, the creation of a National Observatory for Racial Equity in Educational Institutions and holding a National Affirmative Action Forum are activities which will require specific and ambitious outcomes that can be demonstrated and measured in the medium-to-long term. These milestones need to be **more explicitly and specifically outlined during the refresh process** to reinforce the commitment’s potential of delivering open government results.
- **Involve state and municipal actors** earlier in the process as certain milestones directly seek their collaboration. Currently, these actors are not represented in the commitment, although state and local actors have participated in past commitments.<sup>41</sup> For example, these milestones could be expanded to include specific actions to organize dialogue with subnational government officials and civil society.

### **Other commitments**

Other commitments that the IRM did not identify as promising commitments are discussed below. This review provides guidance to contribute to the learning and implementation of these commitments.

**Commitment 2** brings a fresh push to the fight against corruption, which has been a priority since Brazil’s first action plan.<sup>42</sup> It aims to improve the quality, openness, and use of strategic data for the prevention and detention of corruption that match the needs of relevant stakeholders. The commitment could outline more clearly who and how many individuals would be trained on using the data strategically, how many data-quality diagnoses would be conducted, and in what areas.

The current commitment could better reflect and explain how it would strengthen collaboration, as similar actors participated in a previous commitment,<sup>43</sup> and benefit from incorporation into the work of the recently established Transparency, Integrity, and Anticorruption Council.<sup>44</sup>

**Commitment 4** seeks to develop a collaborative network to share best practices and resources, conduct capacity building, and implement collaborative monitoring of the Access to Information Law. The network will be composed of states, municipalities, federal entities, civil society, and other strategic actors. However, it is not clear how this would directly improve existing strategies, policies, and government programs to enhance awareness and compliance with the law.<sup>45</sup> To achieve added value, the network could be institutionalized and form part of a permanent collaborative mechanism to monitor compliance.

**Commitment 6** aims to promote digital and media education for the elderly and directly involve them in the decision-making process for the curriculum. The commitment creates participatory mechanisms for this underrepresented demographic, engaging them in the design of government programs. While the actions may result in modest change, a path to improving the commitment's potential for results could involve increasing the participation of the elderly in the use of online tools such as [fala.br](https://fala.br) and other transparency portals or measuring the impact of the interventions on improving public ability to identify fake news.

**Commitment 7** aims to evaluate, enhance, and expand access to the services offered by the Ministry of Agrarian Development and Family Farming (MDA). The commitment adopts a user-centered approach to improve and monitor services for rural family farmers, which is a traditionally vulnerable group. Improvements in participation and access would be sought by engaging farmers in evaluating, improving, and digitizing the ministry's services. Plans for evaluations, monitoring, implementing recommendations, and incorporating the ministry's services for family farming into the federal government's online evaluation of user satisfaction with public services would contribute towards accountability.<sup>46</sup> Making these satisfaction assessments and evaluations public, and integrating it with data of fiscal, postal, and legal registries would contribute towards transparency. Some of these actions could result in permanent improvements to the ministry's services, but it may turn out to be a standalone and internal initiative towards a set of services while its more innovative aspects are focused on a single improvement effort e.g., participatory evaluation. Consequently, the commitment is considered to have modest potential for results. To further strengthen its potential for results, stakeholders could consider how the participatory evaluation can become a permanent and ongoing aspect of the family farming service and replicate it on other services and sectors.

**Commitment 8** aims to establish a collaborative network for training territorial agents to enhance social participation using popular, digital, and media education to connect politics, public policies, and social participation with people's daily lives.<sup>47</sup> Territorial agents are diverse actors that are closer to local and daily realities and can include neighborhood associations, social movements, unions, interested individuals in general, and government representatives. It recognizes the need for expanding engagement in the OGP process across the country that goes beyond the usual suspect actors by linking OGP with local activism and Brazil's historical tradition of social movements and targeting key agendas such as public participation, education, and inclusion. However, the commitment could go beyond mapping and publishing social participation initiatives. For example, it can aim to diagnose participatory deficiencies across territories or initiatives and tie the involvement of territorial agents more clearly across other milestones to clarify the network's contribution to commitment implementation. Given Brazil's experience with participatory actions and the four-year action plan period, it would benefit from a clearer link between the mapping, training, and dissemination of participatory processes at the territorial level and the broader impact on social participation. The lead institution could also connect this commitment to ongoing participatory mechanisms as part of a whole-of-government strategy.

<sup>1</sup> Daniel Gallas, "Brazil's Odebrecht corruption scandal explained," *BBC News*, 17 April 2019, <https://www.bbc.com/news/business-39194395>.

<sup>2</sup> "Good practices in ensuring compliance with Article 9 of the United Nations Convention against Corruption," *United Nations Office on Drugs and Corruption*, 2021, [https://www.unodc.org/documents/corruption/Publications/2013/Guidebook\\_on\\_anti-corruption\\_in\\_public\\_procurement\\_and\\_the\\_management\\_of\\_public\\_finances.pdf](https://www.unodc.org/documents/corruption/Publications/2013/Guidebook_on_anti-corruption_in_public_procurement_and_the_management_of_public_finances.pdf).

<sup>3</sup> “Processo de Elaboração – 6º Plano de Ação Brasileiro,” [Process of Elaboration – Sixth National Action Plan of Brazil], *Comptroller-General of the Union*, 14 March 2024, [https://www.gov.br/cgu/pt-br/governo-aberto/a-ogp/planos-de-acao/6deg-plano-de-acao-brasileiro/elaboracao\\_6o-plano-de-acao-brasileiro](https://www.gov.br/cgu/pt-br/governo-aberto/a-ogp/planos-de-acao/6deg-plano-de-acao-brasileiro/elaboracao_6o-plano-de-acao-brasileiro).

<sup>4</sup> Instituto Brasileiro de Auditoria de Obras Públicas (IBRAOP) is a national non-profit private civil society organization composed of professionals in engineering, architecture, and agronomy who work on public works auditing. It aims to bring together professionals involved in both external and internal control of public works nationwide. Its primary objective is to enhance technical methods and procedures for auditing and controlling engineering works and services. IBRAOP plays a significant role in auditing and evaluating the management of public funds allocated to construction projects, ensuring compliance with legal and regulatory standards. Their initiatives aim to improve the efficiency of investments, prevent corruption, and enhance public trust in the execution of infrastructure projects across Brazil. See: <https://www.ibraop.org.br/sobre/#:~:text=O%20IBRAOP%20C3%A9%20uma%20sociedade,%C3%A0%20auditoria%20de%20obras%20p%C3%BAblicas>.

<sup>5</sup> “PROC-IBR-SOCIOAMB 006/2023,” *Instituto Brasileiro de Auditoria de Obras Públicas*, June 2023, <https://www.ibraop.org.br/wp-content/uploads/2023/06/PROC-IBR-SOCIOAMB-006-2023.pdf>.

<sup>6</sup> See: <https://portaldatransparencia.gov.br>.

<sup>7</sup> The [obras.gov](https://www.gov.br/obrasgov) platform promotes transparency of investments by tracking and monitoring the implementation of infrastructure projects by the federal government. See: <https://www.gov.br/transferegov/pt-br/obrasgov>.

<sup>8</sup> See Commitment 1 in: “Brazil 6th National Action Plan on Open Government,” *Comptroller-General of the Union*, 2023, [https://www.opengovpartnership.org/wp-content/uploads/2024/01/Brazil\\_Action-Plan\\_2023-2027\\_December\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2024/01/Brazil_Action-Plan_2023-2027_December_EN.pdf).

<sup>9</sup> See: <https://portal.tcu.gov.br/imprensa/noticias/brasil-tem-8-6-mil-obras-paralisadas-financiadas-com-recursos-federais.htm>.

<sup>10</sup> Evidence shows there has been engagement with civil society over the implementation period. See: <https://transparenciainternacional.org.br/posts/governo-e-sociedade-discutem-transparencia-e-participacao-no-setor-de-transporte>.

<sup>11</sup> Renato Morgado (Transparência Brasil), email correspondence with IRM researcher, 19 August 2024.

<sup>12</sup> See: <https://www.gov.br/casacivil/pt-br/novopac/conheca-o-plano>.

<sup>13</sup> Joe Foti, “Reform Space to Watch: Anti-corruption and Infrastructure Data in Brazil,” *Open Government Partnership*, 22 November 2023, <https://www.opengovpartnership.org/stories/reform-space-to-watch-anti-corruption-and-infrastructure-data-in-brazil>.

<sup>14</sup> “PROC-IBR-SOCIOAMB 006/2023,” *Instituto Brasileiro de Auditoria de Obras Públicas*.

<sup>15</sup> “Brasil tem 8,6 mil obras paralisadas, financiadas com recursos federais,” [Brazil has 8.6 thousand public works paralyzed that are financed with federal resources], *Federal Court of Accounts*, 18 October 2023, <https://portal.tcu.gov.br/imprensa/noticias/brasil-tem-8-6-mil-obras-paralisadas-financiadas-com-recursos-federais.htm>.

<sup>16</sup> “Brazil has 8.6 thousand public works paralyzed that are financed with federal resources,” *Federal Court of Accounts*.

<sup>17</sup> See: [https://www.gov.br/cgu/pt-br/governo-aberto/a-ogp/planos-de-acao/6deg-plano-de-acao-brasileiro/compromisso-2/memoria\\_1areuniao-de-monitoramento\\_compromisso-1.pdf](https://www.gov.br/cgu/pt-br/governo-aberto/a-ogp/planos-de-acao/6deg-plano-de-acao-brasileiro/compromisso-2/memoria_1areuniao-de-monitoramento_compromisso-1.pdf).

<sup>18</sup> See: <https://www.gov.br/casacivil/pt-br/novopac>.

<sup>19</sup> See: <https://transparenciainternacional.org.br/posts/governo-e-sociedade-discutem-transparencia-e-participacao-no-setor-de-transporte>.

<sup>20</sup> “Open Contracting for Infrastructure Data Standards,” *Open Contracting Partnership*, <https://standard.open-contracting.org/infrastructure/latest/en/projects>.

<sup>21</sup> “IRM Transitional Results Report: Brazil 2018–2021,” *Open Government Partnership*, 10 October 2024, <https://www.opengovpartnership.org/documents/brazil-transitional-results-report-2018-2021>.

<sup>22</sup> “Through the Power of the People: Empowering Citizen Watchdogs,” *Open Government Partnership*, 21 September 2021, <https://www.ogpstories.org/through-the-power-of-the-people-empowering-citizen-watchdogs/>

<sup>23</sup> Mariluce Moura, “Universidades públicas respondem por mais de 95% da produção científica do Brasil,” [Public universities account for more than 95% of scientific production in Brazil], *Academia Brasileira de Ciências*, 15 April 2019, <https://www.abc.org.br/2019/04/15/universidades-publicas-respodem-por-mais-de-95-da-producao-cientifica-do-brasil>.

<sup>24</sup> “IRM Transitional Results Report: Brazil 2018–2021,” *Open Government Partnership*.

<sup>25</sup> “Brazil 6th National Action Plan on Open Government,” *Comptroller-General of the Union*.

<sup>26</sup> “IRM Results Report: Brazil 2021–2023,” *Open Government Partnership*, 9 October 2024,

<https://www.opengovpartnership.org/documents/brazil-results-report-2021-2023>; see Commitment 3 in: “Brazil 6th National Action Plan on Open Government,” *Comptroller-General of the Union*.

<sup>27</sup> Patricia Bertin (Brazilian Agricultural Research Corporation – Embrapa), interview by IRM researcher, 26 April 2024.

<sup>28</sup> Bianca Amaro, Washington Carvalho, and Priscila Sena (Brazilian Institute of Information in Science and Technology – IBICT), interview by IRM researcher, 2 February 2024.

<sup>29</sup> Bertin, interview; Amaro, Carvalho, and Sena, interview.

<sup>30</sup> Amaro, Carvalho, and Sena, interview.

<sup>31</sup> Affirmative actions are policies, whether public or private, created with the aim of promoting the repair and overcoming of social inequalities that structure the Brazilian society. These inequalities have historically blocked access to university for certain groups, groups that constantly experience discrimination based on their race, class, regionality, living with a disability, sexual orientation, and gender identity. See: <https://www.ufmg.br/prae/acoes-afirmativas/o-que-sao-acoes-afirmativas>.

<sup>32</sup> “Process of Elaboration – Sixth National Action Plan of Brazil,” *Comptroller-General of the Union*.

<sup>33</sup> “IBGE 2022 Census,” *Instituto Brasileiro de Geografia e Estatística*, 2022, <https://www.ibge.gov.br/estatisticas/sociais/trabalho/22827-censo-demografico-2022.html>.

<sup>34</sup> Data from the Ministry of Management and Innovation in Public Services (MGI) also show that black and mixed-race individuals constitute 39.9% of all active civil servants as of March 2024. See: <https://g1.globo.com/politica/noticia/2024/03/26/200-anos-do-senado-22percent-das-cadeiras-foram-ocupadas-por-negros-na-ultima-decada.ghtml>; <https://www.gov.br/gestao/pt-br/assuntos/noticias/2024/marco/politicas-afirmativas-ampliam-presenca-de-pessoas-negras-em-postos-de-decisao-do-governo-federal>.

- <sup>35</sup> Andre Richter, “Less than 15% of Brazilian judges’ self-report as black,” Agencia Brasil, 28 May 2024, <https://agenciabrasil.ebc.com.br/justica/noticia/2024-05/menos-de-15-dos-juizes-brasileiros-se-declaram-negros>.
- <sup>36</sup> Paulo Rená da Silva (Reference Institute for Internet and Society – IRIS & Member of AqualtuneLab), interview by IRM researcher, 10 July 2024.
- <sup>37</sup> Some of these actions include quotas for public education and public service and compulsory teaching of Afro-Brazilian History and Culture as outlined in Decrees No. 11.785/2023 and No. 11.443/2023 as well as Laws No. 12.990/2014, No. 12.711/2012, and No. 10.639/2003. See: “Brazil 6<sup>th</sup> National Action Plan on Open Government,” *Comptroller-General of the Union*; Anonymous government representative, interview by IRM researcher, 29 April 2024.
- <sup>38</sup> See Commitment 5 in: “Brazil 6<sup>th</sup> National Action Plan on Open Government,” *Comptroller-General of the Union*.
- <sup>39</sup> See: <https://www.gov.br/governodigital/pt-br/governanca-de-dados/comite-central-de-governanca-de-dados>.
- <sup>40</sup> The hetero-identification commissions operate in the selection processes of students for federal institutions of higher education in Brazil. Each commission aims to verify the racial self-declaration of the candidate for the vacancy, with the candidate's phenotype as the central reference. See: <https://www.scielo.br/j/cp/a/6v3wNmrTBrstCln6PNCQsg/?format=pdf&lang=pt>. The commissions are formed with the purpose of verifying whether the students who have benefited from quotas for black individuals are actually black or mixed race. See: <https://www1.folha.uol.com.br/educacao/2024/03/bancas-para-identificar-cotistas-negros-chegam-a-todas-as-universidades-federais.shtml>.
- <sup>41</sup> Commitment 12 in Brazil’s fifth action plan was led by a subnational entity. See: “IRM Results Report: Brazil 2021–2023,” *Open Government Partnership*.
- <sup>42</sup> See Commitments 1.3 and 3.1 of Brazil’s first action plan in: “Brazil OGP Action Plan 2012–2013,” *Government of Brazil*, 23 January 2012, <https://www.opengovpartnership.org/documents/brazil-first-national-action-plan-2012-2013>.
- <sup>43</sup> Both commitments share actors such as the CGU, judiciary representatives, Transparência Brasil, and Ethos Instituto.
- <sup>44</sup> For more information on the CTICC, see: “Executive Decree No. 11.528,” *Government of Brazil*, 16 May 2023, [https://www.planalto.gov.br/ccivil\\_03/\\_Ato2023-2026/2023/Decreto/D11528.htm](https://www.planalto.gov.br/ccivil_03/_Ato2023-2026/2023/Decreto/D11528.htm).
- <sup>45</sup> The “LAI para todos” (LAI for all) program share a series of objectives with this commitment, such as training public servants, cataloging and consolidating best practices, ensuring the proper application of the Freedom of Information Act by federal executive branch agencies and entities, and providing technological solutions to optimize access to information, see: <https://www.gov.br/acessoainformacao/pt-br/programa-lai-para-todos>. The Transparent Brazil Scale verifies whether municipalities are meeting the transparency and access to information requirements of Law No. 12.527/2011. Representatives from federal and local government and civil society launched the Brazilian Network of Open Government in April 2024, see: <https://retps.org.br/e-lancada-em-osasco-sp-a-rede-brasileira-de-governo-aberto>.
- <sup>46</sup> The user satisfaction assessment of public services is a digital government initiative that allows citizens to evaluate the public services they have received. The last available ranking is for 2022 and can be accessed at: <https://www.gov.br/governodigital/pt-br/estrategias-e-governanca-digital/transformacao-digital/central-de-qualidade/ranking-de-servicos-e-de-orgaos>. The API is the designated tool to create the evaluations and access the information of these assessments by the user or the service administrator.
- <sup>47</sup> See Commitment 8 in: “Brazil 6<sup>th</sup> National Action Plan on Open Government,” *Comptroller-General of the Union*.

## Section III. Methodology and IRM Indicators

The purpose of this review is not an evaluation. It is intended as a quick, independent, technical review of the characteristics of the action plan and the strengths and challenges the IRM identifies to inform a stronger implementation process. The IRM highlights commitments that have the highest potential for results, a high priority for country stakeholders, a priority in the national open government context, or a combination of these factors.

The three IRM products provided during a national action plan cycle include:

- **Co-Creation Brief:** A concise brief that highlights lessons from previous IRM reports to support a country's OGP process, action plan design, and overall learning.
- **Action Plan Review:** A technical review of the characteristics of the action plan and the strengths and challenges IRM identifies to inform a stronger implementation process.
- **Results Report:** An overall implementation assessment that focuses on policy-level results and how changes happen. It also checks compliance with OGP rules and informs accountability and longer-term learning.

In the Action Plan Review, the IRM follows a filtering and clustering process to identify promising reforms or commitments:

**Step 1:** Determine what is reviewable based on the verifiability of the commitment as written in the action plan.

**Step 2:** Determine if the commitment has an open government lens. Is it relevant to OGP values?

**Step 3:** Review commitments that are verifiable and have an open government lens to identify if certain commitments need to be clustered. Commitments that have a common policy objective or contribute to the same reform or policy issue should be clustered. The potential for results of clustered commitments should be reviewed as a whole. IRM staff follow these steps to cluster commitments:

- a. Determine overarching themes. If the action plan is not already grouped by themes, IRM staff may use OGP's thematic tagging as reference.
- b. Review commitment objectives to identify commitments that address the same policy issue or contribute to the same broader policy or government reform.
- c. Organize commitments into clusters as needed. Commitments may already be organized in the action plan under specific policy or government reforms.

**Step 4:** Assess the potential for results of the clustered or standalone commitment.

Filtering is an internal process. Data for individual commitments is available in Annex 1. In addition, during the internal review process of this product, the IRM verifies the accuracy of findings and collects further input through peer review, OGP Support Unit feedback as needed, interviews and validation with country stakeholders, an external expert review, and oversight by IRM's International Experts Panel (IEP).

As described earlier, IRM relies on **three key indicators** for this review:

### I. Verifiability

- **Yes, specific enough to review:** As written in the action plan, the stated objectives and proposed actions are sufficiently clear and include objectively verifiable activities to assess implementation.
- **No, not specific enough to review:** As written in the action plan, the stated objectives and proposed actions lack clarity and do not include explicitly verifiable activities to assess implementation.
- Commitments that are not verifiable will be considered not reviewable, and further assessment will not be carried out.

### II. Open government lens

This indicator determines if the commitment relates to the open government values of transparency, civic participation, or public accountability as defined by the Open Government Declaration and the OGP Articles of Governance by responding to the following guiding

questions. Based on a close reading of the commitment text, the IRM first determines whether the commitment has an open government lens:

- **Yes/No:** Does the commitment set out to make a policy area, institution, or decision-making process more transparent, participatory, or accountable to the public?

The IRM uses the OGP values as defined in the Articles of Governance. In addition, the following questions for each OGP value may be used as a reference to identify the specific open government lens in commitment analysis:

- **Transparency:** Will the government disclose more information, improve the legal or institutional frameworks to guarantee the right to information, improve the quality of the information disclosed to the public, or improve the transparency of government decision-making processes or institutions?
- **Civic Participation:** Will the government create or improve opportunities, processes, or mechanisms for the public to inform or influence decisions? Will the government create, enable, or improve participatory mechanisms for minorities or underrepresented groups? Will the government enable a legal environment to guarantee freedoms of assembly, association, and peaceful protest?
- **Public Accountability:** Will the government create or improve opportunities to hold officials answerable for their actions? Will the government enable legal, policy, or institutional frameworks to foster accountability of public officials?

### III. Potential for results

The IRM adjusted this indicator—formerly known as the “potential impact” indicator—to take into account the feedback from the IRM Refresh consultation process with the OGP community. With the new results-oriented strategic focus of IRM products, the IRM modified this indicator to lay out the expected results and potential that would be verified in the IRM Results Report after implementation. Given the purpose of this Action Plan Review, the assessment of potential for results is only an early indication of the possibility the commitment has to yield meaningful results based on its articulation in the action plan in contrast with the state of play in the respective policy area.

The scale of the indicator is defined as:

- **Unclear:** The commitment is aimed at continuing ongoing practices in line with existing legislation, requirements, or policies without indication of the added value or enhanced open government approach in contrast with existing practice.
- **Modest:** A positive but standalone initiative or change to processes, practices, or policies. The commitment does not generate binding or institutionalized changes across government or institutions that govern a policy area. Examples are tools (e.g., websites) or data release, training, or pilot projects.
- **Substantial:** A possible game changer for practices, policies, or institutions that govern a policy area, public sector, or the relationship between citizens and state. The commitment generates binding and institutionalized changes across government.

This review was prepared by the IRM in collaboration with Christiana Soares de Freitas and Pedro Espailat and was externally expert reviewed by Andy McDevitt. The IRM methodology, quality of IRM products, and review process are overseen by IRM’s IEP. For more information, see the IRM Overview section of the OGP website.<sup>1</sup>

<sup>1</sup> “IRM Overview,” Open Government Partnership, <https://www.opengovpartnership.org/irm-guidance-overview>.

## Annex 1. Commitment by Commitment Data<sup>1</sup>

<p><b>Commitment 1: Transparency and social participation in public infrastructure policies</b></p> <ul style="list-style-type: none"> <li>• Verifiable: Yes</li> <li>• Does it have an open government lens? Yes</li> <li>• Potential for results: Substantial</li> </ul>
<p><b>Commitment 2: Data for the collective fight against corruption</b></p> <ul style="list-style-type: none"> <li>• Verifiable: Yes</li> <li>• Does it have an open government lens? Yes</li> <li>• Potential for results: Modest</li> </ul>
<p><b>Commitment 3: Collaborative practices for science and technology</b></p> <ul style="list-style-type: none"> <li>• Verifiable: Yes</li> <li>• Does it have an open government lens? Yes</li> <li>• Potential for results: Substantial</li> </ul>
<p><b>Commitment 4: Culture of access to information</b></p> <ul style="list-style-type: none"> <li>• Verifiable: Yes</li> <li>• Does it have an open government lens? Yes</li> <li>• Potential for results: Modest</li> </ul>
<p><b>Commitment 5: Ethnic and racial data for affirmative</b></p> <ul style="list-style-type: none"> <li>• Verifiable: Yes</li> <li>• Does it have an open government lens? Yes</li> <li>• Potential for results: Modest</li> </ul>
<p><b>Commitment 6: Digital and media education for the elderly people</b></p> <ul style="list-style-type: none"> <li>• Verifiable: Yes</li> <li>• Does it have an open government lens? Yes</li> <li>• Potential for results: Modest</li> </ul>
<p><b>Commitment 7: Better services for family farming</b></p> <ul style="list-style-type: none"> <li>• Verifiable: Yes</li> <li>• Does it have an open government lens? Yes</li> <li>• Potential for results: Modest</li> </ul>
<p><b>Commitment 8: Social participation and popular education in the territories</b></p> <ul style="list-style-type: none"> <li>• Verifiable: Yes</li> <li>• Does it have an open government lens? Yes</li> <li>• Potential for results: Modest</li> </ul>

<sup>1</sup> Editorial notes: Commitment short titles may have been edited for brevity. For the complete text of commitments, please see “Brazil 6<sup>th</sup> National Action Plan on Open Government,” *Comptroller-General of the Union*, 2023, [https://www.opengovpartnership.org/wp-content/uploads/2024/01/Brazil\\_Action-Plan\\_2023-2027\\_December\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2024/01/Brazil_Action-Plan_2023-2027_December_EN.pdf).

## Annex 2: Action Plan Co-Creation

OGP member countries are encouraged to aim for the full ambition of the OGP Participation and Co-Creation Standards that came into force on 1 January 2022.<sup>1</sup> The IRM assesses all countries that submitted action plans from 2022 onward under the updated standards. Table 2 outlines the extent to which the countries' participation and co-creation practices meet the minimum requirements that apply during development of the action plan.

OGP instituted a 24-month grace period to ensure a fair and transparent transition to the updated standards. Action plans co-created and submitted by 31 December 2023 fall within the grace period. The IRM will assess countries' alignment with the standards and their minimum requirements.<sup>2</sup> However, countries will only be found to be acting contrary to process if they do not meet the minimum requirements for action plans co-created in 2024 and onwards.

**Table 2. Compliance with minimum requirements**

Minimum requirement	Met during co-creation?	Met during implementation?
<b>1.1 Space for dialogue:</b> Brazil's OGP multistakeholder forum (MSF) comprises the Interministerial Committee for Open Government (CIGA) and the Civil Society Working Group (CSWG), which have existed since 2014. <sup>3</sup> In 2019, an Executive Decree defined the CIGA's current scope and responsibilities in relation to open government. <sup>4</sup> In 2023, CIGA composition was increased from 13 to 15 members, <sup>5</sup> who agreed to take on new initiatives such as the implementation of OECD recommendations, developing an Open Government Strategy, creating indicators to ensure the sustainability of actions, and evaluating the impact of open government projects. <sup>6</sup> The CGU confirmed that the MSF met regularly during co-creation at least every six months. <sup>7</sup>	Yes	<i>To be assessed in the Midterm Review</i>
<b>2.1 OGP website:</b> There is a dedicated public site for the sixth action plan that contains information on the co-creation process, sub-portals for monitoring commitment implementation, and the action plan document itself. <sup>8</sup>	Yes	<i>To be assessed in the Midterm Review</i>
<b>2.2 Repository:</b> Brazil's OGP website holds a repository with information on the co-creation process and implementation of current and past action plans. <sup>9</sup> According to the CGU, it is updated at least every trimester during implementation and was updated within 15 days of completion of each stage in the co-creation process, <sup>10</sup> which the IRM was able to confirm. <sup>11</sup> The publication of consultation responses and co-creation workshop results indicate the repository was frequently updated during co-creation. <sup>12</sup>	Yes	<i>To be assessed in the Midterm Review</i>
<b>3.1 Advanced notice:</b> The CGU held a meeting with government and civil society organizations on 7 June 2023 to share the methodology for producing the sixth action plan. <sup>13</sup> The CGU published a summary of the event on its website and disseminated the news via Instagram on 13 June 2023. They published another announcement on Instagram two weeks in advance of the start of the first public consultation which began on 12 July 2023 <sup>14</sup> and a more detailed timeline on the co-creation	Yes	<i>To be assessed in the Midterm Review</i>



process later. <sup>15</sup> In the future, detailed timelines could be published online as soon as the information is shared directly with stakeholders.		
<b>3.2 Outreach:</b> The government and civil society conducted dissemination activities on social media and institutional portals. <sup>16</sup>	Yes	Not applicable
<b>3.3 Feedback mechanism:</b> The process of defining priority themes involved the public in three stages: (1) A public consultation for the thematic priorities ran for 14 days on 12–26 July 2023 with a total of 126 contributions received; <sup>17</sup> (2) which were then compiled and filtered into 65 thematic priorities by the CGU as CIGA coordinator alongside CSWG representatives on 26 July–7 August 2023; <sup>18</sup> and (3) where the compiled themes were submitted to a public voting process on the Participa+ Brasil digital platform on 7–28 August 2023. The final stage received 1,889 votes from 541 citizens and identified 4 thematic priorities: combating corruption, access to information, transparency and participation in infrastructure, and collaborative science. <sup>19</sup> Two further rounds of co-creation workshops were organized to provide additional space for feedback and focused on both civil society and government priorities, <sup>20</sup> which were then validated by CIGA and CSWG. <sup>21</sup>	Yes	Not applicable
<b>4.1 Reasoned response:</b> Contributions from stakeholders were documented publicly. <sup>22</sup> Written feedback on how each proposed theme and inputs were considered in developing the action plan was published to civil society and government stakeholders. <sup>23</sup>	Yes	<i>To be assessed in the Midterm Review</i>
<b>5.1 Open implementation:</b> The IRM will assess whether meetings were held with civil society stakeholders to present implementation results and enable civil society to provide comments in the Results Report.	Not applicable	<i>To be assessed in the Midterm Review</i>

<sup>1</sup> “OGP Participation and Co-Creation Standards,” *Open Government Partnership*, 2021, <https://www.opengovpartnership.org/ogp-participation-co-creation-standards>.

<sup>2</sup> “IRM Guidelines for the Assessment of Minimum Requirements,” *Open Government Partnership*, <https://www.opengovpartnership.org/documents/irm-guidelines-for-the-assessment-of-minimum-requirements>.

<sup>3</sup> “Resolution CGU No. 1,” *Comptroller-General of the Union*, 18 November 2014, [https://www.gov.br/cgu/pt-br/governo-aberto/governo-aberto-no-brasil/grupo-de-trabalho-da-sociedade-civil/copy\\_of\\_grupo-de-trabalho-da-sociedade-civil/resolucao\\_instituiqt\\_ge\\_ciga\\_2014.pdf](https://www.gov.br/cgu/pt-br/governo-aberto/governo-aberto-no-brasil/grupo-de-trabalho-da-sociedade-civil/copy_of_grupo-de-trabalho-da-sociedade-civil/resolucao_instituiqt_ge_ciga_2014.pdf).

<sup>4</sup> “Decree N. 10.160/2019,” *Government of Brazil*, 10 December 2019, <http://pesquisa.in.gov.br/imprensa/jsp/visualiza/index.jsp?data=10/12/2019&jornal=515&pagina=3&totalArquivos=181>.

<sup>5</sup> “Ordinance CGU. N. 3.340/2023,” *Comptroller-General of the Union*, <https://www.gov.br/cgu/pt-br/governo-aberto/governo-aberto-no-brasil/resolveuid/5a779befba294ebf849b8d23f40ce26d>. The new composition reflects changes in the government’s public administration organigram between 2019 (Bolsonaro Administration) and 2023 (Lula Administration). For example, the Ministry of Economics was created by consolidating the Ministry of Finance and the Ministry of Management of Innovation in Public Services and was part of CIGA in 2019. In 2023, these ministries were again separated and continue to be part of CIGA. See current composition of CIGA in: “Ordinance CGU N.1.525/2024,” *Comptroller-General of the Union*, [https://www.gov.br/cgu/pt-br/governo-aberto/governo-aberto-no-brasil/portaria\\_1-525\\_2024.pdf](https://www.gov.br/cgu/pt-br/governo-aberto/governo-aberto-no-brasil/portaria_1-525_2024.pdf).

<sup>6</sup> See: <https://www.gov.br/cgu/pt-br/governo-aberto/noticias/2023/12/primeira-reuniao-da-nova-composicao-do-comite-interministerial-governo-aberto>; Otavio Castro Neves (IRM Point of Contact at the Comptroller General of the Union), interview by IRM researcher, 18 June 2024.

<sup>7</sup> Neves, interview.

<sup>8</sup> “Processo de Elaboração – 6º Plano de Ação Brasileiro,” [Process of Elaboration – Sixth National Action Plan of Brazil], *Comptroller-General of the Union*, 14 March 2024, <https://www.gov.br/cgu/pt-br/governo-aberto/a-ogp/planos-de-acao/6deg-plano-de-acao-brasileiro>.

<sup>9</sup> See: <https://www.gov.br/cgu/pt-br/governo-aberto/a-ogp/planos-de-acao>.

<sup>10</sup> Neves, interview.

<sup>11</sup> “IRM Results Report: Brazil 2021–2023,” *Open Government Partnership*, 9 October 2024, <https://www.opengovpartnership.org/documents/brazil-results-report-2021-2023>.

<sup>12</sup> For example, a report for the co-creation workshops of each commitment that occurred between 2–5 October 2023, was published in the repository. See: <https://www.gov.br/cgu/pt-br/governo-aberto/noticias/2023/10/primeira-etapa-das-oficinas-de-cocriacao-de-governo-aberto-do-6deg-plano-de-acao-nacional>. Similarly, the public consultations result for thematic proposals on 12–26 July 2023 could be downloaded from the repository at:

[https://www.gov.br/cgu/pt-br/governo-aberto/a-ogp/planos-de-acao/6deg-plano-de-acao-brasileiro/sistematizacoes\\_contribuicoes\\_final.xlsx](https://www.gov.br/cgu/pt-br/governo-aberto/a-ogp/planos-de-acao/6deg-plano-de-acao-brasileiro/sistematizacoes_contribuicoes_final.xlsx).

<sup>13</sup> See: <https://www.gov.br/cgu/pt-br/assuntos/noticias/2023/06/cgu-realiza-encontro-de-governo-aberto-e-inicia-construcao-do-6o-plano-de-acao-nacional>.

<sup>14</sup> See: <https://www.instagram.com/p/CuE53x8t3Wp/?hl=en>.

<sup>15</sup> See: [https://www.gov.br/cgu/pt-br/governo-aberto/a-ogp/planos-de-acao/6deg-plano-de-acao-brasileiro/elaboracao\\_6o-plano-de-acao-brasileiro](https://www.gov.br/cgu/pt-br/governo-aberto/a-ogp/planos-de-acao/6deg-plano-de-acao-brasileiro/elaboracao_6o-plano-de-acao-brasileiro).

<sup>16</sup> This includes: (1) a social media post by a civil society organization, see:

<https://www.instagram.com/cgmnit/p/CwNfxZPvCyH/?hl=zh-cn&ref=159>; (2) a news article on a government website,

see: <https://agenciagov.ebc.com.br/noticias/202310/cgu-inicia-elaboracao-do-6o-plano-de-acao-nacional-junto-a-parceria-para-governo-aberto>; (3) a blog by a civil society member of the MSF, see: <https://ok.org.br/noticia/6o-plano-de-acao-nacional-de-governo-aberto-organizacoes-recomendam-voto-em-tres-temas>; and (4) a social media post by CGU, see: <https://www.instagram.com/p/Cwhq8lwRM8k/?hl=en>.

<sup>17</sup> The opening of the first public consultation for thematic proposal is available at: <https://www.gov.br/cgu/pt-br/governo-aberto/noticias/2023/07/consulta-publica-para-definicao-dos-temas-do-6deg-plano-de-acao-nacional-da-ogp>; while the uncategorized results can be downloaded at: [https://www.gov.br/cgu/pt-br/governo-aberto/a-ogp/planos-de-acao/6deg-plano-de-acao-brasileiro/sistematizacoes\\_contribuicoes\\_final.xlsx](https://www.gov.br/cgu/pt-br/governo-aberto/a-ogp/planos-de-acao/6deg-plano-de-acao-brasileiro/sistematizacoes_contribuicoes_final.xlsx).

<sup>18</sup> Explanation on how the proposed themes were compiled is available at: <https://www.gov.br/cgu/pt-br/governo-aberto/a-ogp/planos-de-acao/6deg-plano-de-acao-brasileiro/definicao-dos-temas-do-6deg-plano-de-acao-nacional-da-ogp>.

<sup>19</sup> Voting process results are available at: <https://www.gov.br/cgu/pt-br/governo-aberto/a-ogp/planos-de-acao/6deg-plano-de-acao-brasileiro/devolutiva-temas-sociedade.pdf>.

<sup>20</sup> The description and evidence of this process can be found at: <https://www.gov.br/cgu/pt-br/governo-aberto/a-ogp/planos-de-acao/6deg-plano-de-acao-brasileiro/Oficinas-cocriacao-6-plano-acao-nacional>.

<sup>21</sup> The description of the development process of the plan can be accessed at: [https://www.gov.br/cgu/pt-br/governo-aberto/a-ogp/planos-de-acao/6deg-plano-de-acao-brasileiro/elaboracao\\_6o-plano-de-acao-brasileiro](https://www.gov.br/cgu/pt-br/governo-aberto/a-ogp/planos-de-acao/6deg-plano-de-acao-brasileiro/elaboracao_6o-plano-de-acao-brasileiro).

<sup>22</sup> See: <https://www.gov.br/participamaisbrasil/6-plano-priorizacao-temas>.

<sup>23</sup> Neves, interview; see: <https://www.gov.br/cgu/pt-br/governo-aberto/a-ogp/planos-de-acao/6deg-plano-de-acao-brasileiro/Oficinas-cocriacao-6-plano-acao-nacional>; <https://www.gov.br/cgu/pt-br/governo-aberto/confira-os-oito-temas-que-comporao-o-6o-plano-de-acao-nacional-de-governo-aberto/devolutiva-temas-governo-1.pdf/view>.