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Governance in Environmental Policy: Advances and Challenges to Develop a Brazilian Green Economy

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Paper presented at the UNRISD conference
**Green Economy and Sustainable Development:
Bringing Back the Social Dimension**

10–11 October 2011 • Geneva



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Abstract

The objective of this paper is to analyse the governance of the Brazilian environmental policy based on the following question: which actors take part in the policy processes and what are the roles played by each one? The intent is to analyse the institutional design of the environmental sector and the degree of involvement and capacity of each actor to influence this arena. This study considered two dimensions: (1) the intergovernmental interaction, involving federal, state and municipal governments; and (2) the intersectoral interaction, involving governments, civil society and the business sector. The establishment of the National Environmental Policy, in 1981, organized the main actors and defined the governance of the National Environmental System, in an attempt to overcome the historical fragmentation of the issue. The result is a complex engineering in environmental governance, with many spaces and types of articulation: intragovernmental, intergovernmental, with workers and civil society, and with the business sector. Despite the advances in environmental regulation, the effective functioning of this gear still faces many problems: the disproportionate weight of government in relation to workers and civil society, the lack of legitimacy of intergovernmental arenas, the lack of effective incorporation of civil society representatives in decision making processes.

Introduction

The debate about climate change and the need to fit countries' growth within the concepts of sustainable development and green economy¹ has spread around the world. This situation is not different in Brazil, involving governments, civil society and the business sector in discussions about the future of the country.

In this context, the objective of this paper is to analyze the governance of the Brazilian environmental policy, focusing on the processes of policy formulation and implementation, particularly on those programs related to sustainable development and green economy. From the study of governance we pursue an answer to the following question: which actors take part in the processes and what are the roles played by each one? The intent is to analyze the institutional design of the environmental sector and ascertain the degree of involvement and the capacity of each actor to influence the environmental public policy. The participation of all actors is crucial in environmental issues especially considering it is a crosscutting theme.

This study will consider two dimensions which, although not mutually exclusive, have been split for analytical purposes. The first dimension corresponds to the mechanisms of intergovernmental interaction, i.e. between federal, state and municipal governments. This is a fundamental aspect to be considered in countries with federal structure and also because the environmental issue is a crosscutting theme and the responsibility for its future can not be attributed to a single government body, which raises the need to consider mechanisms of federal interaction – such as locus of negotiation –; policy coordination processes led by the Federal Government; vertical cooperation mechanisms – between federal, state and municipal governments –; and horizontal cooperation mechanisms – among municipalities or among states. A previous research on policy arenas in Brazil has revealed a lack of formal federative interaction mechanisms. The health system is the sector that has progressed the most in this aspect, with the establishment of the Tripartite Management Commission (CIT) – a formal locus of negotiation and agreement of the Brazilian Unified Health System with equal participation of representatives of the three spheres of government – and the Bipartite Management Commission (CIB) at the state level. This model has been replicated by the social services policy, but in other areas such as education, agriculture and fisheries, regional development, among others have not developed similar mechanism.

In the environmental policy there is the National Tripartite Technical Commission (CTN), established in 2001, and the State Tripartite Technical Commissions (CTE), established in 2003. These arenas were designed to foster and strengthen the dialogue between the spheres of government and therefore are similar to the TMC and BMC of the health policy. Despite the creation of these arenas, what we see is their fragility as a tool to strengthen the issues related to sustainable development.

The second dimension refers to the mechanisms of intersectoral interaction, involving governments, civil society and the business sector. The crosscutting nature of environmental issues requires the involvement of all sectors in the discussion about the future of the country. The intent is to identify if the government makes use of tools that go beyond its regulatory prerogative on environmental issues and promotes a process of

¹ Green Economy was defined by the United Nations Environment Programme (UNEP 2011) “as one that results in improved human well-being and social equity, while significantly reducing environmental risks and ecological scarcities.”

discussion with the whole of society. In this sense, there is the National Environment Conference, a process – that takes place each 2 or 3 years – of discussion and definition of the main guidelines of the Brazilian sustainable development policy. In these forums, there is higher percentage of representatives of civil society organizations (40 per cent), and fewer of others: the productive sector accounts for 40 per cent, government 20 per cent, indigenous 5 per cent, and traditional people 5 per cent. This is a bottom-up approach that starts from local forums and converge to the national forum. The strategy of the forums does not exhaust other forms of articulation between the three sectors, particularly concerning an ongoing dialogue process. Herein lays the absence of a permanent forum to promote the dialogue with the business sector and representatives of civil society organizations. Only recently, in May 2011, the productive sector and the Federal Government announced the creation of a forum to discuss the Brazilian environmental policy (Correa 2011). However, the business sector has already been ahead of the government when it disclosed, in 2009, an open letter to Brazil on climate change, in which a group of companies made a commitment to reduce their carbon emissions in a voluntary basis (Carta Aberta 2009).

The fact is that the Brazilian environmental policy has been advancing in a fragmented way and with punctual interaction between the actors – governments, civil society and the productive sector. In this scenario, the main hypothesis of this study is that the weakness and fragmentation of the environmental arena result from the lack of a culture of federative agreements, i.e. between the spheres of government, and also due to the absence of a culture of interdisciplinary dialogue involving the creation of permanent negotiation and agreement structure. These aspects reflect in the governance of the Brazilian environmental policy that, while providing some locus of articulation, appears to be fragile in its operation.

In addition, there is an institutional weakness of many Brazilian municipalities – especially those with a smaller population – which, although independent politically, face financial difficulties and do not have sufficient qualified technical staff to address the environmental challenges. Moreover, the lack of a culture of horizontal articulation also creates difficulties for the development of territorial actions, particularly if we consider that the environment is not an issue that respects the boundaries of a municipality or a state.

To advance in this discussion, this article is divided in 4 parts, besides this introduction. The next section presents a brief history of fragmentation in the Brazilian environmental policy, followed by an analysis of the Brazilian National Environmental Policy and its attempt to integrate environmental initiatives and incorporate all levels of government and other actors – civil society, workers and the business sector – in the decision making process and also in the building of shared environmental management. The third section presents a deeper analysis of the main spaces of articulation and discusses the advances and the challenges in the environmental governance. Finally, the conclusion section presents the main findings of this paper.

Environment and public policies in Brazil: a brief history of fragmentation

Public policies related to the environment have a history of fragmentation and, consequently, lack of coordination and interaction. As noted by Almeida (2003), natural resources were initially seen as economic assets and as such, the regulation defined the forms of access and use. The evolution of the concerns related to sustainable development added environmental issues to the economic vision, reflecting in the regulation laid down by government agents.

In this process, the State initially set its control and management authority over natural wealth and resources and after that defined the forms of access and exploration by private enterprises. This was accompanied by a sectorization of the actions in the Federal Government, which established, in 1934, three agencies to operate in three distinct but related sectors: the National Department of Water and Energy, the National Department of Mineral Production, and the Federal Forest Service. Throughout the 1960s, during the military regime in Brazil, the legislation were updated and new structures were created – such as the Mineral Resources Research Company – in order to reduce bureaucratic constraints and make more agile procedures related to activities involving access to natural resources (Almeida 2003).

The National Environment Policy (Law 6,938/1981) represented an effort to build a common vision of the environmental issues, seeking to overcome the logic of sectorization and fragmentation. Based on this concept the National System of Environment were designed, which will be discussed in the next section. Nevertheless, the regulation of this law was promulgated only in 1990 (Decree 99: 274).

The re-democratization of the country in the mid 1980s and the National Constitution of 1988 pushed the environmental theme into a new level and turned it into a central issue in policy design. At the same time, states and municipalities have gained autonomy and competence to legislate on these issues, but the regulation about the field of action and the scope have been left for later clarification and is still awaiting for better definition. Some issues are often defined on demand, restoring the logic of fragmentation to the detriment of a full picture of the environment.

The establishment of the Brazilian Institute of Environment and Renewable Natural Resources (IBAMA), in 1989, was an effort towards better integration, as it merged the Rubber Office, the Brazilian Institute for Forestry Development, the Fishery Development Office and the Special Environmental Secretariat². The National Department of Mineral Production was transformed into a special authority and later into the National Mining Agency. In the field of water resources, the National Water Agency³ was established in 2000, and the formation of river basin consortia was stimulated. Other agencies were also created, such as the Brazilian Forest Service (SFB), in 2006, and the Chico Mendes Institute for Biodiversity Conservation (ICMbio), in 2007. Leme (2010: 30) has also noted that:

In the current decade, the creation of new environmental agencies under the Ministry of the Environment points to a tendency of specialization

² Federal Law nº 7.735/1989.

³ Federal Law nº 9.984/2000.

and compartmentalization of environmental agendas [...]. The creation of these bodies was not accompanied by the establishment of an institutionalized forum under a legal framework that would provide coordination between the specific agendas, although there is superposition. Thus, the coordination between the agencies is contingent, since it is at the discretion of political actors, and then those agencies do not always become clearly articulated, which often leads to the overlapping of responsibilities, resources, effort and still demonstrates deficiency in the coordination of environmental policies.

In addition to this fragmentation within the federal government, the states also began to regulate strongly in various industries, following the economic growth driven by increasing industrialization and the environmental problems that arose from it. Thus, many States were ahead of federal legislation that often absorbed what already existed to make it a national standard. This is the case, for example, of the State of São Paulo, with restrictive legislation in the area of industrial pollution, which formed the basis for federal legislation.

The participation of the society was also expanded with the creation of public policy management councils in the three spheres of government, which were built as consultative and deliberative forums with representatives from the government and civil society. Noteworthy are the environmental councils, the river basin committees and the areas of environmental protection. Despite the potential to increase social participation, “these instances are often quite formal, without being able to influence the decision making process, and where representation have often a very contradictory character” (Jacobi 2003).

Although the sectorization is an important resource to deal with a broad field, the absence of integration and articulation mechanisms represents a major constraint to the effectiveness of environmental policy, a context that the National Environmental Policy was not able to balance completely.

The Brazilian National Environmental Policy: towards an integrated policy?

The challenges of environmental management in Brazil are exacerbated by the size of its continental territory, to which are added the long Brazilian coastline, and the diversity of terrestrial and aquatic biomes. Moreover, there is an increasing international pressure claiming for environmental protection and an emergence of issues related to climate change, which need to be considered together with the expansion of agriculture and industrial development in regions that has not yet been a priority in terms of investment.

From an internal perspective, the country's federative structure also stands as a challenge to environmental management because it requires greater interaction and coordination among the components of the federation. This is necessary because the environment is not an issue that follows the political and territorial division of the country. Besides the interaction among the spheres of government, we need also to consider the participation of civil society in the discussion and definition of environmental policies. How to do this in a country with 8,000 km² and that are soon expected to reach 200 million people is the challenge posed to the citizenry.

And to understand how this challenge is being faced it is necessary to start the discussion from the National Environmental Policy, a federal law passed by in 1981. This legislation established the National Environmental System (SISNAMA), composed of representatives of the three spheres of government and expected to be the main mechanism suited to deal with environmental issues in Brazil. The structure and functions of the SISNAMA are listed in Table 1.

Table 1 – Structure and Functions of the SISNAMA

Type of Body	Entity	Assignment – Law 6.938/1981 and subsequent amendments
Superior Body	Federal Government Council	“advise the President in the formulation of the national environment and natural resources policy.”
Consultative and Deliberative Body	National Environment Council – CONAMA	“the purpose is to advise, study and propose to the Government Council the guidelines of government policy for the environment and natural resources and deliberate, within its competence, on norms and standards compatible with an ecologically balanced environment and essential to a healthy quality of life”
Central Body	Ministry of Environment - MMA	“plan, coordinate, supervise, and control, as a federal agency, the national policy and government guidelines established for the environment.”
Executive Body	<ul style="list-style-type: none"> • Brazilian Institute of Environment and Renewable Natural Resources – IBAMA • Chico Mendes Institute for Biodiversity Conservation 	“Implement and enforce, as a federal agency, the government policy and guidelines established for the environment.”
State Body	State agencies	“implementation of programs, projects, and the control and supervision of activities capable of causing environmental degradation.”
Local Body	Municipal agencies	“control and supervision of those activities in their jurisdictions.”

Source: National Environmental Policy (Brazil 1981)

The Government Council has an advisory function to the President and thus the main body of the SISNAMA is the National Environment Council (CONAMA), which is chaired by the Ministry of Environment and with representation of all ministries, the IBAMA, the Chico Mendes Institute, the state and local governments, workers, civil society and business (See the complete list in Annex I).

Each of the 26 state governments and the Federal District government is entitled to appoint one member to the CONAMA. In general they are from the State Secretariat of Environment or other equivalent agency.

The representatives of municipal governments are chosen from among those who have structured an environmental agency and a deliberative environment council. The members are: one from each geographic region of the country (5 members), one from the National Association of Municipalities and Environment (ANAMMA), and two from other national association of municipalities.

In addition, CONAMA has twenty-one representatives of labor organizations and civil society, as follows: two representatives of an environmental organization from each geographic region of the country; a representative of a national environmental organization; three representatives of associations legally formed for the protection of natural resources and that fight against pollution, of free choice of the President; a representative of a national professional entity involved in environmental and sanitation issues, appointed by the Brazilian Association of Sanitary and Environmental Engineering (ABES); a workers' representative appointed by trade unions and confederation of workers from urban areas; a representative of workers from rural areas; a representative of traditional populations; an indigenous' community representative appointed by the People Articulation Council and Indigenous Organizations of Brazil (CAPOIB); a representative of the scientific community, appointed by the Brazilian Society for the Advancement of Science (SBPC); a representative of the National Council of General Chiefs of the Military Police and Military Firefighters (CNCG); and a representative of the Brazilian Foundation for the Conservation of Nature (FBCN).

The 8 private sector representatives are chosen from business entities. CONAMA can also appoint an honorary member. Finally, there are three non-voting members.

From an organizational standpoint, CONAMA has in its structure: Technical Chambers (CT), Special Chambers (CE), Working Groups (GT), and Environmental Policy Integration Committee (CIPAM). There are 11 Technical Chambers which are assigned to develop, analyze, and report to the Council on the issues within their competence (see Annex II for the current Technical Chambers and Working Groups). The Working Groups are time-limited and are created to analyze, study and make proposals on issues within its competence and are under a Technical Chamber. The Special Chamber "is the CONAMA's administrative body and is responsible for final trials regarding fines and other administrative penalties imposed by IBAMA. Decisions of the Chamber are final." (MMA, nd). The CIPAM has the competence to integrate the topics discussed in the CTs and GTs, to promote its dissemination and systematization, and monitor and evaluate the implementation of decisions taken by the Council.

The CONAMA shall hold four regular meetings a year and there are also special meetings which can be convened by three-quarters of its members. The Council is responsible for:

... study and propose policy guidelines for environmental issues and natural resources, establish standards and criteria for the licensing of polluting activities; institute studies on the alternatives and potential environmental consequences of public or private projects; decide on fines or penalties as the last instance is the system; submit proposals for granting and tax benefits aimed at improving environmental quality (Jacobi 2003: 326).

CONAMA's decisions may be taken in the form of: (1) Resolutions, when the deliberation is about guidelines and technical standards, criteria and standards related to environmental protection and sustainable use of environmental resources, (2) Motions, in the case of manifestation related to the environmental issue, (3) Recommendations, in the case of manifestation on the implementation of policies, public programs and standards with repercussions in the environmental arena, including partnership

agreements⁴, (4) Propositions, in the case of environmental issues to be submitted to the Government Council, to the Senate Commissions, or to the House of Representatives, and (5) Decisions, in the case of fines and other penalties imposed by IBAMA, as the final administrative instance and level of appeal, only if the CIPAM had been heard before (MMA, s.d.). Since its creation, the Council has issued 440 Resolutions, 118 Motions, 12 Recommendations, 3 Propositions, and 7 decisions.

This is the structure, represented in Annex III, which supports the advancement of environmental protection initiatives. To discuss the functioning of this structure three issues will be addressed: intergovernmental relations, intergovernmental relations and civil society participation.

The main spaces of articulation: advances and challenges in environmental governance

The Government Council will not be analyzed in this article because it is an advisory body of the Presidency for all subjects and not only in environmental issues. Thus, in the National Environmental System the principal entity is the National Environmental Council (CONAMA), with representatives from different sectors of the political and civil society. Looking the Council composition, we find that there are 107 members, according to Table 2 (The complete list is in Annex I).

Table 2 –Composition of the National Environmental Council (CONAMA)

Representatives	N.	%
Government	76	71
Federal	41	
State	27	
Municipal	8	
Workers and Civil Society	22	20,6
Business Sector	8	7,5
Honorary Member	1	0,9
TOTAL	107	100

Source: Environment Ministry (Brazil n.d.)

There is a clear predominance of government representatives (76 members which represent 71 per cent of the total) in the main decision making body on environmental policy in Brazil. Also worth of note is the predominance of the Federal Government in relation to other spheres, with 41 members or 38 per cent of the members of the Council. This highlights the importance of the federal sphere in the debates with other spheres of government and with civil society and business.

In the following sections we will deepen the debate about CONAMA’s composition and its implications for environmental governance.

Intergovernmental Relations

The presence of all ministries and secretaries of state in the CONAMA reveals, from an institutional design perspective, that the environment is seen as a transversal issue and that, therefore, permeates all government agencies. Thus, their presence in the Council

⁴ As established in the Federal Law n° 9.790/1999.

reflects the possibility to promote better coordination and greater synergy between federal actions related to the environment, and also the need to incorporate environmental issues into all public policies.

However, an analysis of the participation of different ministries in the last 11 meetings (that was held between 2010 and August 2011) reveals that some of them are not diligent members (Brazil, 2011). Among the 41 representatives of the Federal Government, seven of them have attended all meetings: ICMBio, Ministry of Navy, Ministry of Science and Technology, Ministry of Defense, Ministry of Environment, Ministry of Mines and Energy, and Ministry of Transport. At the other end, the champion of absences was the Ministry of Labor and Employment, with 9 faults (82 per cent). Then, with seven absences (64 per cent) were the Ministry of Sports and the Special Secretariat for Policies to Promote Racial Equality. With six absences (54 per cent) were the Ministry of Health and the Special Secretariat of Human Rights. One should try to justify the absence considering the thematic gap between these agencies and the environment. However, considering that Brazil will host the next World Cup (2014) and the Olympics (2016), the implications of large projects on the environment and for employment creation are clear.

In some sectors, the interface with environmental issues is more direct, such as in the Ministry of Agrarian Development (MDA) that deals with issues related to land use and also with the settlements through the National Institute of Colonization and Agrarian Reform (INCRA). Thus, the interaction between MDA and MMA sounds necessary and CONAMA would be one of the main spaces of dialogue. In terms of participation, the MDA had three absences (27 per cent), although its presence has been effected through an alternate member on 7 occasions (64 per cent) and by the full member in only one meeting (9 per cent). Despite the relative participation of representatives from the MDA, the tension between both ministries reveals the difficulty task of coordination and articulation through CONAMA. In 2008, the MMA openly criticized the MDA and INCRA of being responsible for the six major deforestation areas, caused by settlements located in the State of Mato Grosso (Fatorelli, & Mertens, 2010). One of the main points of disagreement were about the methodological approach used to measure deforestation: while the MDA adopted the measurements done by the National Institute for Space Research (INPE), the MDA and the Department of Environment of Mato Grosso State adopted another technology, resulting in divergent and conflicting data.

Fatorelli and Mertens (2010: 408) also noted that “there is disarticulation among internal sectors, low qualification of the technical staff, lack of infrastructure, low degree of integration and cooperation among technicians and administrators across departments and institutions that have related activities.” The set of problems, the authors say, shows the lack of planning and sectoral integration from design to monitoring.

Although adjustments have been made to overcome the problem, the fact is that the context is a symptom of the difficulties faced by CONAMA and other federal agencies that operate in the environmental area to establish standards and disseminate them among federal staff.

The existence of other structures that also deals with environmental issues is another challenge for the articulation and production of a joint vision. For instance, only in the Ministry of Environment there are nine collegiate bodies.

An initiative to coordinate some ministries and promote the integration of policies was the revision of the Plan for Preventing and Combating Deforestation in the Amazon (PPCDAM). The “PPCDAM was launched in 2004 and is an innovative tool, since it has been drawn up by 14 ministries of the Brazilian government based on the previous work of the Permanent Inter-Ministerial Working Group” (Fatorelli, & Mértens 2010: 410).

In addition to that, another joint effort emerged from the creation of the CONAMA/CNRH Permanent Integration Commission, in 2006. The CNRH is the Water Resources National Council and is under de Ministry of Environment (MMA), as is CONAMA. But the difficulties of this commission were identified by the agency that created it, the MMA:

We emphasize that this CONAMA/CNRH Commission had its members nominated only in December 12, 2007, through Ministerial Order n. 590/07, which also determined that this committee should be under the coordination of the DSIS [SISNAMA Coordination Department]. The first meeting of the CONAMA/CNRH Permanent Commission was held at the MMA headquarters on March 3, 2008, during which has been settled that their meetings should be quarterly, but subsequent superior command suspended the activities of this commission (Brazil 2009: 6).

These situations reveal the enormous complexity of environmental issues, especially when different ministries have initiatives that impact on nature. The difficulty to establish a dialogue and the ineffective meetings of the CONAMA make necessary new efforts on coordination, but these efforts do not always bring the solutions initially expected.

Intergovernmental Relations

Subnational governments are also represented on the CONAMA, although with a lower number of seats in proportion to the Federal Government. There are 27 seats for the states and Federal District (25 per cent) and 8 seats for the municipalities (7.5 per cent).

The analysis of member’s participation in the Council meetings shows that two states were absent in seven of them in the last two years (64 per cent): Paraná and Amapá; 3 states missed 6 meetings (54 per cent): Acre, Minas Gerais and Paraíba; and 4 states failed to attend almost half of the meetings (45 per cent): Ceará, Maranhão, Pará and Tocantins, revealing a distrust of this instance of articulation.

Even considering the participation of the states in the meetings of the CONAMA, this does not necessarily reflect in concrete actions by state governments. This is due to the fact that many state departments do not have the necessary infrastructure in terms of equipment, personnel, and financial resources to operate in the formulation, implementation and supervision of environmental issues (Leme 2010: 6).

On the part of municipalities, the main absence was from the representative of the National Front of Mayors (FNP) who missed seven meetings (64 per cent), followed by the representative of the cities of the Northeast Region, with 4 faults (45 per cent). The absence of FNP is remarkable, since it is one of the main organizations that promote articulation between municipalities. On the other hand, the representative of the National Confederation of Municipalities (CNM), which also articulate municipalities

missed only one meeting (9 per cent), while the representative of the National Association of Municipalities of Environment missed two (18 per cent).

In addition to CONAMA's quarterly meetings, the Ministry of Environment established additional interlocution structures: the National Tripartite Technical Commission⁵ (CTN) and the State Tripartite Technical Commissions⁶ (CTE). The CTN was established in 2001 in order to promote dialogue among governments and implement the idea of the shared environmental management, i.e., the articulation of the three spheres of government in the management of environmental issues. It would then strengthen the SISNAMA. It is interesting to note that the CTN is a forum with parity of representation, having been created with three members from each level of government and extended to 5 members in 2007⁷. In addition it is important to highlight that that state governments are represented by the Brazilian Association of State Environmental Entities (ABEM), which brings together state environment departments and other government agencies related to the issue. On the part of municipalities, the representatives are appointed by the National Association of Municipal Environmental Agencies (ANAMMA), which brings together municipal secretariats and other municipal agencies related to the environment.

These horizontal networks (ABEM and ANAMMA) should be highlighted as important *loci* of interaction and intergovernmental coordination, creating an institutional space not only from the political point of view, but also regarding technical issues, since creates a space for environmental managers to exchange experiences and knowledge. Also regarding the political aspect, these networks can serve to build consensus and common position, especially in situations that involve some kind of confrontation with another level of government, notably the federal one.

The National Tripartite Technical Commission, for its part, is characterized as a space of vertical articulation intended to integrate different levels of government. From a conceptual point of view, it is an important mechanism for building a space for the exercise of an ongoing dialogue in which the views of the different spheres of government are brought to the negotiating table. At the same time, it has the potential to align the expectations of the actors and to act as a point for exchange of information, from Federal Government to the subnational levels and also in the opposite direction.

However, besides the fact that institutional participants are the same in both instances, it is unclear how the interaction between CTN and CONAMA takes place.

The Tripartite State Technical Commissions were created in each of the 26 Brazilian states and the Bipartite Technical Commission was created in the Federal District. As in CTN, there is parity in the composition, with two members of each level of government. The CTEs have emerged as a demand of the 1st National Environment Conference held in 2003 and were created as instances of political articulation and the resolutions of the Commissions should be taken by consensus of its members.

The CTEs were designed as an important space to foster the dialogue between the municipalities of a given state with the environmental agency of that state. The state-municipalities articulation is one of the most fragile aspects of the Brazilian federation,

⁵ Established by the Ministerial Order n° 189/2001 from the Environment Ministry.

⁶ Established by the Ministerial Order n° 473/2003 from the Environment Ministry.

⁷ Composition of the CTN changed by the Ministerial Order n° 23/2007 from the Environment Ministry (MMA 2008: 8).

as a consequence of an intense process of decentralization of social policies triggered after the country's democratization in the late 1980s. This process transferred to municipalities the responsibility for implementing many of the policies, and the states role regarding the relationship with municipalities remained unclear (Abrucio, and Gaetani, 2006). In this scenario, both levels of government avoided an approach in terms of joint formulation and implementation of policies.

An analysis on the role of the CTEs conducted by the Coordination to Support Federative Articulation (CAAF) of the SISNAMA Coordination Department concluded that they were:

... devoid of a clear and continuous methodology of articulation to promote a shared environmental management, and most of the CTEs had worked poorly, without focusing its actions on major issues related to shared environmental management and the strengthening of SISNAMA, also presenting weak internal institutional organization and absence of a support structure from the federal level. (Brazil 2010: 11)

It is easy to note the lack of articulation with CTN and MMA, which reflected in the lack of planning in the CTEs and in the absence of a thematic agenda related to its initial objective, i.e., the shared environmental management. In many of the CTEs there were not regular meetings, which were interrupted by political interests, during election years, lack of mobilization, among other factors. There were also failures to raise the awareness of federal agencies such as the IBAMA and the MMA, including its state units, as well as of the state governments, resulting in the lack of priority to the subject by these actors.

The failure in intergovernmental dialogue reflected in another instance, the State Environment Councils. According to an informal survey conducted by the National Association of Municipal Environmental Agencies (ANAMMA), "there is no single state council with a seat to represent municipalities" (Leme 2010: 30).

It is also noteworthy that the CTN and the CTEs are incorporated in the SISNAMA in a precarious way, because they were created by means of ministerial orders and thus these commissions are more fragile than the legislation that created the National Environmental Policy and also the CONAMA. Leme (2010, p. 6) points out that they can be dismantled at any time or even ignored by superior decision makers. Considering the lack of interest of the MMA in the CTN and CTEs, subnational governments have a role in the strengthening of these spaces, which are important channels of communication and negotiation with the Federal Government. If we consider the ministerial orders, the CTN and the CTEs would then have the same status and the weakness that have the Tripartite Management Commission and Bipartite Management Commission of the Brazilian Unified Health System (SUS). These instances, however, were legitimized by the actors themselves, in spite of some difficulties they have faced, and would hardly be ignored or even dismantled in the decision making process of the public health system (Lucchese 1996; Sano 2008).

Another weakness of the CTN is the fact that the ministerial order had not specified its regulation and even today there are not a by-law specifying norms and procedures of operation, requiring from its members constant updates through the issuance of new ordinances.

In this context, it is possible to analyze another aspect of the case involving the tension between the MMA and MDA (Fatorelli and Mertens 2010) discussed in previously. Besides the lack of intergovernmental coordination - between the two ministries involved in the case – it is clearly possible to see that CONAMA was not efficient in getting their guidelines understood by the State of Mato Grosso. This was exactly the case regarding the definition of the appropriate methodology for the analysis of deforestation and also in the procedures for obtaining Rural Environmental License.

The issue of licensing has been addressed by several researchers, who reported several fails, such as the lack of standardized procedures, methodologies, organization, and storage of information, problems to which the lack of a structured and capable team to deal with the theme can be added (Sousa 2005; Soares 2008; Azevedo 2009; Fatorelli and Mertens 2010).

Relations with civil society

In the CONAMA, workers and civil society have a fifth of the representatives, which can be considered a very inexpressive number compared to the size of the government sector. To make the situation worse, two representatives of the "quota" of civil society are in fact members of government: the representative of ANAMMA, which is an organization that brings together representatives of municipal environmental agencies, and also the representative of the National Council of General Chiefs of the Military Police and Military Firefighters. Both organizations were created as civil associations, but the intention was to promote articulation among similar governmental agencies and, thus, their members also represent the government. Moreover, it is worth noting that other three representatives are freely chosen by the President of the Republic, and one of them has not yet been nominated. These features further increase the dominance of government in the decisions of the CONAMA.

Besides the CONAMA, the civil society can take part both in the State Environment Councils and in the Municipal Environment Councils. The results of these spaces, however, have been uneven, with the prevalence of the government in the decision making “because many times government have the majority of the representation, which greatly increases the power to manipulate consensus and results, and the broader the representation of different segments, the greater the legitimacy of decisions” (Jacobi 2003: 328). The author also noted the strengthening of some environmental NGOs which have been playing an important role in many state and municipal councils.

Despite these problems, some of the environmental councils “have the duty to regulate the law, which makes participation in these spaces even more important for the different segments that hold an interest in the field of environmental preservation. Others have a consultative function and provide a space for the society to present its viewpoint in the formulation of public policies and programs” (Jacobi 2005).

Another challenge to foster social participation in these spaces of deliberation is the technical language of the field, which makes it more difficult for some members to decide in a clear and conscious way. On a survey among members of CONAMA, Fonseca et. al. (2010) have found that 73 per cent of them understand only part of the matters being discussed. The difficulty would be a result from the breadth of topics addressed under the umbrella of environmental issues, since the themes can range from energy to fishing biodiversity, from solid waste to the use of pesticide, among many others. Add to that the need to combine technical and legal knowledge. The survey has

also revealed that the members of the council were in doubt about the political interests that may be involved in technical subjects.

But if we consider only the members of CONAMA from the MMA, we will find that they have the support of specialists in various industries, which does not occur with the representatives of civil society, who are considered the least prepared and qualified in terms of technical knowledge to participate in the meetings of CONAMA.

In this context, some CONAMA's resolutions has ended up presenting low technical quality, resulting in the establishment of standards that are not applicable or that create doubts in its interpretation (Fonseca et. al. 2010: 15). In the survey, at least 18 resolutions have been identified by counselors as having negative impact on environmental management.

These facts point out the importance of counselors' capacity building initiatives, but there are few studies evaluating these programs and their impact on the role of counselors.

Thus, although there are opportunities for civil society participation, deeper analysis are needed to assess their actual contribution and to avoid the use of their presence as a way to merely legitimize a decision in a context where the vast majority of votes belong to the government sector.

Another mechanism of social participation is the National Environment Conference that aims to "build a space of social convergence for the formulation of a national agenda of the environment, through mobilization, education and expansion of popular participation, which aims to establish a sustainable development policy for the country" (BRASIL n.d). The Conferences should take place every two years and until now there have been three: 2003, 2005 and 2008. It happens in a bottom-up fashion and is based on local conferences in all Brazilian states which are open to broad social participation. These local conferences converge into the national forum.

Returning to the Rural Environmental Licensing process in the Mato Grosso State, now in terms of social participation, Azevedo (2009) has noted a lack of participation, preparation and discussion of the tool for environmental licensing with society. Fatorelli and Mertens (2010: 408).explain that this may be a result "of its legal language, which make it practically inaccessible to most people."

In short, although the participation of civil society is contemplated in several forums, their effective participation is often limited by lack of priority that these spaces have received from governments, to which can be added the lack of preparation and expertise of civil society members. In this context they simply end up legitimizing government decisions.

Conclusions

The establishment of the National Environmental Policy, in 1981, organized the main actors around the theme and set out the parameters of the governance structure of the National Environmental System. Subsequent amendments adapted this structure to the new democratic values of the country, incorporating state and municipal governments and civil society in the process of discussion and deliberation on environmental issues.

The result is a complex engineering in environmental governance, with many spaces and types of articulation: intergovernmental, intergovernmental, with workers and civil society, and with the business sector. Despite the advances in environmental regulation, the effective functioning of this gear still faces many problems.

The National Environment Council has emerged as the major body of deliberation on the theme and was designed to incorporate in the decision-making process the three spheres of government, workers, civil society and business sector. It reflects, therefore, the transversal dimension of environmental issues, which can not be bounded by geographical boundaries that define the territorial limits of municipalities and states. At the same time recognizes the impact that each actor represented in the Council may cause to the environment, and vice versa, urging them to assume their responsibilities in the decisions and consequences on the elements of nature.

The disproportionate weight of government in relation to workers and civil society representatives, however, unbalance the dispute within the Council. Even among the levels of government, the federal sphere has more representatives and may ultimately have greater influence in shaping the debates. In addition, the presence of experts in different themes to support the members of the Ministry of Environment in the debates in the CONAMA also increases the weight of the ministry's argument vis-à-vis other segments in the council.

The absence of representatives of some ministries in the meetings of the Council is symptomatic of the difficulty to raise the environmental issue to a central position in all policy arenas. The transversality of the issue has not yet been incorporated by all governmental actors.

And even the attendance at the meetings does not seem to actually be enough to foster greater interaction between members and avoid misunderstandings, such as the discussion between the Ministry of Environment and the Ministry of Rural Development regarding the deforestation in Mato Grosso State and the procedures for obtaining the Rural Environmental License. This divergence also reflects the difficulties that the agencies under the MMA have in monitoring and supervising the implementation of its own guidelines. It also reflects the lack of articulation between the CONAMA and the National Tripartite Technical Commission (CTN) and the State Tripartite Technical Commission (CTE).

The CTN and CTEs have their own problems of legitimacy, both by the lack of support and recognition from MMA and IBAMA, as well as from state environment secretaries. The CTEs were conceived as a unique space that would allow the interaction between a state and the municipalities to discuss the directions of a shared environmental management. But the lack of importance that most state governments have given to this space reflects the traditional logic of this level of government, i.e., acting for itself and without considering the possibilities of synergy or even the offer of technical support to municipalities. On the other hand, the presence of representatives from Federal Government in the CTEs also overcomes a trend in other policy areas in which federal programs connect directly with the municipalities without any form of articulation with state governments.

The weakening of these spaces of federative articulation reflects the difficulty of the three spheres of government to incorporate into their political practice the negotiation

process, where differences and disagreements do not mean mere detachment and disruption, but the need to strengthen the dialogue and the search for understanding in the definition of the contours of a shared environmental management and, consequently, the strengthening of SISNAMA.

The absence of representatives of civil society in these two places of articulation (CTN and CTEs) is also noteworthy, repeating the same characteristics of the Tripartite Management Commission and Bipartite Management Commission of the health system. Their participation is mandatory in the State Environment Councils and also in the Municipal Environment Councils, and other collegiate institutions related to the theme. A major fact that limits their effective participation regards the lack of technical knowledge in most, if not in all, the issues under responsibility of CONAMA. It raises the need to discuss and incorporate new forms of training and strengthening civil society organizations. To strengthen the desired shared management in environment it is necessary also to strengthen the participation of society itself.

In fact, the civil society participation in the three Conferences of the Environment is also worth highlighting. Such participation has led, for example, to the creation of the CTEs. But the recent lack of priority in the Conferences by the MMA reveals that social participation in public policy is not a priority. It also signals the resumption of a vision focused on government agencies as the holders of the knowledge and, consequently, of the responses to environmental problems. The prevalence of this vision put society and other weak actors in a legitimizing role of the official policies, since they have a seat on several environmental deliberative boards.

Finally, the challenges to develop plural environmental governance are enormous, as well as the challenges that nature brings us. The search for a more coordinated and cooperative action, both in the horizontal and vertical way, as well as the effective incorporation of civil society in decision making processes are some of the major issues facing the entire society.

References

- Abrucio, F. L. and F. Gaetani. 2006. “Avanços e perspectivas da gestão pública nos estados: agenda, aprendizado e coalizão.” In Consad, *Avanços e perspectivas da gestão pública nos estados*. Consad, Brasília.
- Almeida, J. G. A. 2003. *A construção da gestão ambiental dos recursos minerais*. Tese de Doutorado, Instituto de Filosofia e Ciências Humanas da Universidade Estadual de Campinas, Campinas.
- Azevedo, A. A. 2009. *Legitimação da insustentabilidade? Análise do Sistema de Licenciamento Ambiental de Propriedades Rurais - SLAPR (Mato Grosso)*. Dissertação de Mestrado, Centro de Desenvolvimento Sustentável, UnB, Brasília.
- Brazil. Conselho Nacional do Meio Ambiente – Conama. 2011. *Presença de Conselheiros nas Reuniões Plenárias Ordinárias e Extraordinárias do Conselho Nacional do Meio Ambiente – CONAMA - Exercícios 2010 e 2011*. Brasília: Conama.
- Brazil. Ministério do Meio Ambiente. 2009. *Relatório Anual: Comissões Tripartite*. MMA, Brasília.
- Brazil. 1981. *National Environmental Policy*. Law No. 6938/1981.
- Brazil. Ministério do Meio Ambiente. Conselho Nacional do Meio Ambiente – Conama. 2008. *Estado da arte das Comissões Técnicas Tripartite Nacional: Nota informativa 001/2008*. Brasília: Conama.
www.docstoc.com/docs/50739231/NOTA-INFORMATIVA-n%C2%BA-0012008-SAICDSISAAFS
- Brazil. Ministério do Meio Ambiente. (n.d.). MMA.
www.mma.gov.br/sitio/index.php?ido=conteudo.monta&idEstrutura=116&idConteudo=5923&idMenu=5260.
- Carta aberta ao Brasil sobre Mudanças Climáticas.
www.mma.gov.br/estruturas/182/_arquivos/cartamudancasclimaticas_182.pdf.
- Correa, C. 2011. *Governo e setor privado debatem estratégias para biodiversidade*.
www.mma.gov.br/sitio/index.php?ido=ascom.noticiaMMA&idEstrutura=8&codigo=6873.
- Fatorelli, L. and F. Mertens. 2010. “Integração de Políticas e Governança Ambiental: o caso do licenciamento rural no Brazil.” *Ambiente & Sociedade*, Vol. 18, No. 2, pp. 401-415. www.scielo.br/pdf/asoc/v13n2/v13n2a12.pdf
- Fonseca, I. F, M. Bursztyn and A.M.M. Moura. 2010. “Conhecimentos Técnicos, Políticas Públicas e Participação: O Caso do Conselho Nacional do Meio Ambiente – CONAMA.” *Encontro da Anppas*.
www.anppas.org.br/encontro5/cd/artigos/GT3-321-237-20100903125339.pdf

- Jacobi, P. 2005.. “Governança institucional de problemas ambientais.” *Política e Sociedade*, No. 7, pp. 119-37.
- Jacobi, P. 2003. “Espaços públicos e práticas participativas na gestão do meio ambiente no Brasil.” *Sociedade e Estado*, Brasília, Vol. 18, No. 1/2, pp. 315-338.
- Leme, T. N. 2010. “Os municípios e a política nacional do meio ambiente.” *Planejamento e políticas públicas*, IPEA Brasília, Vol. 35.
- Lucchese, P. T. R. 1996. “Descentralização do financiamento e gestão da assistência à saúde no Brasil: a implementação do Sistema Único de Saúde - retrospectiva 1990/1995.” *Planejamento e Políticas Públicas*, No. 14. Ipea, Rio de Janeiro.
- Sano, H. 2008. *Articulação horizontal no federalismo brasileiro: os Conselhos de Secretários Estaduais*. Tese de doutorado, Fundação Getulio Vargas - Escola de Administração de Empresas de São Paulo, São Paulo, SP, Brazil.
- Soares, J. L. N. 2008. A organização territorial de assentamentos rurais para atender a legislação ambiental na Amazônia. *Campo-Território: Revista de Geografia Agrária*, No. 3, pp. 143-155.
- Sousa, P. M. 2005. *Análise do licenciamento ambiental como instrumento de política do meio ambiente no rio Grande do norte - Período 1992-2003*. Dissertação de Mestrado, Faculdade de Arquitetura e Urbanismo, Universidade Federal do Rio Grande do Norte, Natal.
- UNEP (United Nations Environment Programme). 2011. *Towards a Green Economy: Pathways to Sustainable Development and Poverty Eradication - A Synthesis for Policy Makers*. France: UNEP.

Annex I – Composition of the CONAMA

N.	PRESIDENCY
1	- CHAIRMAN OF CONAMA
2	- EXECUTIVE SECRETARY
	ENTITIES OF WORKERS AND CIVIL SOCIETY
3	- BRAZILIAN ASSOCIATION OF HEALTH AND ENVIRONMENTAL ENGINEERING - ABES
4	- CIVIL ASSOCIATION INDICATED BY THE PRESIDENT OF THE REPUBLIC -
5	- CIVIL ASSOCIATION INDICATED BY THE PRESIDENT OF THE REPUBLIC - THE ASSOCIATION OF ENVIRONMENTAL PROTECTION-ADEMASP
6	- CIVIL ASSOCIATION INDICATED BY THE PRESIDENT OF THE REPUBLIC - INSTITUTE FOR THE RIGHT ONE PLANET GREEN
7	- TRADE UNIONS AND CONFEDERATIONS WORKERS OF THE URBAN AREA
8	- SCIENTIFIC COMMUNITY
9	- INDIGENOUS COMMUNITY
10	- NATIONAL CONFEDERATION OF AGRICULTURAL WORKERS - CONTAG
11	- NATIONAL COUNCIL OF COMMANDERS GENERAL OF POLICE AND MILITARY FIRE BRIGADE - CNCG
12	- AGENCIES OF ENVIRONMENTAL CENTER-WEST - ECODATA
13	- AGENCIES OF ENVIRONMENTAL CENTER-WEST - FUNATURA
14	- ENVIRONMENTAL AUTHORITIES OF NORTHEAST - BIOESTE
15	- ENVIRONMENTAL AUTHORITIES OF NORTHEAST - FURP
16	- ENVIRONMENTAL AUTHORITIES OF THE NORTH - SOS AMAZON
17	- ENVIRONMENTAL AUTHORITIES OF THE NORTH - KANINDÉ
18	- SOUTHEAST OF ENVIRONMENTAL ORGANIZATIONS - LAND POINT
19	- SOUTHEAST OF ENVIRONMENTAL AUTHORITIES - PROAMA
20	- AGENCIES OF SOUTHERN ENVIRONMENTAL - LOVE
21	- AGENCIES OF SOUTHERN ENVIRONMENTAL - Inga
22	- AGENCIES OF NATIONAL ENVIRONMENTAL - MOVE
23	- BRAZILIAN FOUNDATION FOR THE CONSERVATION OF NATURE - FBCN
24	- TRADITIONAL POPULATIONS
	BUSINESS ENTITIES
25	- CONFEDERATION OF AGRICULTURE AND FISHERIES OF BRAZIL - CNA
26	- NATIONAL CONFEDERATION OF INDUSTRY - CNI
27	- NATIONAL CONFEDERATION OF INDUSTRY - CNI
28	- NATIONAL CONFEDERATION OF INDUSTRY - CNI
29	- NATIONAL CONFEDERATION OF TRADE IN GOODS, SERVICES AND TOURISM - CNC
30	- NATIONAL CONFEDERATION OF TRADE IN GOODS, SERVICES AND TOURISM - CNC
31	- NATIONAL CONFEDERATION OF TRANSPORT - CNT
32	- FOREST SECTOR
	MUNICIPAL GOVERNMENTS
33	- NATIONAL CONFEDERATION OF MUNICIPALITIES - CNM
34	- NATIONAL FRONT OF MAYORS - FNP
35	- LOCAL GOVERNMENTS - NATIONAL ANAMMA
36	- LOCAL GOVERNMENTS - WEST CENTRAL REGION ANAMMA
37	- LOCAL GOVERNMENTS - ANAMMA NORTHEAST
38	- LOCAL GOVERNMENTS - REGION NORTH ANAMMA
39	- LOCAL GOVERNMENTS - ANAMMA SOUTHEAST
40	- LOCAL GOVERNMENTS - ANAMMA SOUTH REGION
	STATE GOVERNMENTS
41	- GOVERNMENT OF THE FEDERAL DISTRICT
42	- STATE GOVERNMENT - ACRE
43	- STATE GOVERNMENT - Alagoas

44	- STATE GOVERNMENT - AMAPÁ
45	- STATE GOVERNMENT - AMAZON
46	- STATE GOVERNMENT - BAHIA
47	- STATE GOVERNMENT - CEARÁ
48	- STATE GOVERNMENT - THE HOLY SPIRIT
49	- STATE GOVERNMENT - GOIÁS
50	- STATE GOVERNMENT - Maranhao
51	- STATE GOVERNMENT - MATO GROSSO
52	- STATE GOVERNMENT - MATO GROSSO DO SUL
53	- STATE GOVERNMENT - MINAS GERAIS
54	- STATE GOVERNMENT - PARANA
55	- STATE GOVERNMENT - PARAÍBA
56	- STATE GOVERNMENT - FOR
57	- STATE GOVERNMENT - Pernambuco
58	- STATE GOVERNMENT - Piaui
59	- STATE GOVERNMENT - RIO DE JANEIRO
60	- STATE GOVERNMENT - RIO GRANDE DO NORTE
61	- STATE GOVERNMENT - RIO GRANDE DO SUL
62	- STATE GOVERNMENT - RONDÔNIA
63	- STATE GOVERNMENT - RORAIMA
64	- STATE GOVERNMENT - SANTA CATARINA
65	- STATE GOVERNMENT - Sergipe
66	- STATE GOVERNMENT - SAO PAULO
67	- STATE GOVERNMENT - Tocantins
	FEDERAL GOVERNMENT
68	- NATIONAL WATER AGENCY - ANA
69	- HOUSE OFFICE OF THE PRESIDENT OF THE CIVIL
70	- AIR FORCE COMMAND
71	- COMMAND OF THE NAVY
72	- COMMAND OF THE ARMY
73	- INSTITUTIONAL SECURITY OFFICE OF THE PRESIDENCY OF THE REPUBLIC
74	- BRAZILIAN INSTITUTE OF THE ENVIRONMENT AND RENEWABLE NATURAL RESOURCES - IBAMA
75	- CHICO MENDES INSTITUTE FOR BIODIVERSITY CONSERVATION - ICMBIO
76	- MINISTRY - AGRICULTURE, LIVESTOCK AND SUPPLY
77	- MINISTRY - CITIES
78	- MINISTRY - SCIENCE AND TECHNOLOGY AND INFORMATION
79	- MINISTRY - COMMUNICATIONS
80	- MINISTRY - CULTURE
81	- MINISTRY - DEFENSE
82	- MINISTRY - AGRICULTURAL DEVELOPMENT
83	- MINISTRY - DEVELOPMENT AND FIGHT AGAINST HUNGER
84	- MINISTRY - DEVELOPMENT, INDUSTRY AND FOREIGN TRADE
85	- MINISTRY - EDUCATION
86	- MINISTRY - SPORT
87	- MINISTRY - FARM
88	- MINISTRY - NATIONAL INTEGRATION
89	- MINISTRY - JUSTICE
90	- MINISTRY - ENVIRONMENT
91	- MINISTRY - MINES AND ENERGY
92	- MINISTRY - FISHING AND AQUACULTURE
93	- MINISTRY - PLANNING, MANAGEMENT AND BUDGET
94	- MINISTRY - SOCIAL SECURITY
95	- MINISTRY - FOREIGN
96	- MINISTRY - HEALTH

97	- MINISTRY - WORK AND EMPLOYMENT
98	- MINISTRY - TRANSPORT
99	- MINISTRY - TOURISM
100	- MEDIA SECRETARIAT OF THE PRESIDENCY OF THE REPUBLIC
101	- SECRETARY OF INSTITUTIONAL RELATIONS OF THE OFFICE OF THE PRESIDENT
102	- SPECIAL SECRETARIAT OF POLICIES FOR THE PROMOTION OF RACIAL EQUALITY OF THE PRESIDENCY OF THE REPUBLIC
103	- SPECIAL SECRETARIAT OF POLICIES FOR WOMEN'S PRESIDENCY OF THE REPUBLIC
104	- HUMAN RIGHTS SPECIAL SECRETARIAT OF THE PRESIDENCY OF THE REPUBLIC
105	- SPECIAL SECRETARIAT OF THE PRESIDENCY OF THE REPUBLIC PORTS
106	- GENERAL SECRETARIAT OF THE PRESIDENCY OF THE REPUBLIC
	HONORARY MEMBER
107	- HONORARY MEMBER
	NOT VOTING DIRECTORS
	- COMMITTEE ON ENVIRONMENT AND SUSTAINABLE DEVELOPMENT OF THE HOUSE OF REPRESENTATIVES
	- FEDERAL PROSECUTOR
	- STATE PROSECUTOR

Source: Brazil (s.d.)

Annex II – Technical Chambers (CT) and Working Groups (GT) of the CONAMA

- CT International Affairs
- CT Legal Affairs
- CT mining, Energy and Infrastructure
- CT Biodiversity, Fauna and Fishing Resources
 - GT EXOTIC SPECIES - Introduction, Reintroduction and Translocation of Exotic Species in Aquatic Environments
- CT Quality Control and Environmental
 - GT Dredging - Forwarding 421/10, 344/04 Review of laying down general guidelines and procedures for evaluating the minimum material to be dredged in Brazilian waters
 - GT Stationary Sources - Define standards for emissions of air pollutants from stationary sources
 - GT Proconve Promot - Responsibility for technologies used in Proconve and Promot.
- CT Economics and the Environment
 - GT Climate Change - Impacts of Climate Change in Brazil and the Role of CONAMA in Adoption and Adaptation Measures
 - GT RECYCLED PAPER - Recycling paper and concept definition and parameters of recycled paper.
- CT Environmental Education
- CT Forest and agroforestry activities
- CT Land Management and Biomes
 - GT 369/06 MONITORING - Monitoring and Analysis of the Effects of Resolution 369/2006
 - GT TOP OF HILL - Definition of the concepts 'hilltop' and 'ridge line' listed in CONAMA Resolution No. 303/02
- CT Health, Environmental Sanitation and Waste Management

- GT Electronics - Waste electrical and electronic equipment
- GT Used Containers - management of packaging used lubricating oil
- GT Lamps - Final destination of waste lamps containing mercury.
- GT Micronutrients - Use of industrial waste listed as a raw material for manufacture of suppliers of micronutrients used as agricultural input
- GT to Monitor Resolution 362/05 - Group-monitoring of CONAMA Resolution 362/2005
- GT Review 05/93 - Management of solid waste services at ports, airports, bus and train stations.
- GT REVIEW 307/02 - Review of Resolution No. 307/02 - Waste from construction
- CT and other Protected Areas Protected Areas
- GT CATEGORIES OF MANAGEMENT REGULATIONS - Biological Reserve,
Ecological Station, Environmental Protection Area, Area of Relevant Ecological Interest, Wildlife Refuge

Interinstitutional Working Group

- GTI Restoration and Preservation of Areas of Permanent Preservation-APP
- Subgroup campaign 'Let's Take Care of APP
- Subgroup Mapping of APP
- Subgroup Methodology for recovery and restoration of APP
- Subgroup Plan to encourage restoration and preservation of APP

Annex III – Environmental Governance Structure

