



SUPPORTING
AN ENABLING ENVIRONMENT
FOR CIVIL SOCIETY

Enabling Environment Snapshot

Brazil

January 2026

Context

Period covered by this report: September 2025 to January 2026

Brazil enters 2026 in a context shaped by the upcoming national electoral cycle, persistent political polarisation, and ongoing tensions in public debate around issues such as the environment, land, public security, and human rights. Although democratic institutions remain formally consolidated, the socio-political environment continues to be sensitive to competing narratives, disinformation, and episodes of political and territorial violence, with uneven impacts across regions.

At the institutional level, the federal government maintains a stated commitment to social participation and dialogue; however, the effectiveness of these mechanisms depends on administrative capacity, policy stability, and the meaningful incorporation of civil society input. At the same time, fiscal constraints, volatility in international cooperation, and the concentration of funding increase sustainability challenges for CSOs, particularly territorially rooted organisations. In areas marked by land disputes, environmental protection, and organised violence, significant risks for community leaders and human rights defenders persist, directly shaping the practical conditions for civic action in the country.

1. Respect and protection of fundamental freedoms

[Brazil's 1988 Constitution](#) provides strong formal guarantees for freedom of association, expression, assembly and due process, which remain the core legal basis for civil society action and protection of human rights defenders (HRDs). In practice, civic space continues to oscillate between institutional reopening and recurring [attempts to stigmatise, monitor, or constrain civil society organisations](#) (CSOs) through political and administrative pressure.

A key positive institutional development was the adoption of [Decree No. 12,710 \(5 Nov 2025\)](#) establishing a National Plan for the Protection of Human Rights Defenders (PlanoDDH), built with civil society participation and framed as compliance with judicial and [Inter-American Court obligations](#). However, by late 2025 the Plan faced [coordinated legislative pushback](#), with multiple PDLs (legislative decrees) seeking to suspend Decree 12,710—an initiative [denounced by the Brazilian Committee of Human Rights Defenders](#) as a direct threat to the country's main protection policy for HRDs. The National Plan politically strengthens the [federal Protection Programme of Human Rights Defenders, Communicators and Environmentalists](#), but coverage and effectiveness of the programme remain [structurally challenged](#) given the scale and geographic concentration of risk.

Even without broad legal rollback of association rights, CSOs continuously report patterns consistent with “[bureaucratic criminalisation](#),” including retroactive accountability demands, arbitrary administrative procedures, and financial/operational obstacles that chill legitimate activity.

2. Supportive legal framework for the work of civil society actors

Brazil’s [Constitution](#) guarantees freedom of association and other fundamental rights that underpin the legality and autonomy of civil society organisations (CSOs).

In 2025, the federal government approved a comprehensive “[MROSC Manual – From Planning to Accountability](#)” through Interministerial Ordinance SG/MGI/AGU [No. 197 \(11 August 2025\)](#), aiming to unify procedural guidance across all phases of federal partnerships and strengthen legal certainty for both CSOs and public managers. [The manual is presented as a practical tool to standardise procedures](#) and improve partnership management. Municipal stakeholders have treated it [as an important step to strengthen local implementation capacity](#). In January 2026, the [Ministry of Culture adopted the MROSC Manual](#) as a mandatory technical reference for managing and monitoring partnerships with civil society organisations.

The report “[Challenges to the Sustainability of CSOs and Democracy in Brazil](#)”, published in October 2025, indicates that, despite advances in the regulatory framework governing partnerships between the State and civil society, organisations continue to face significant administrative and bureaucratic challenges. Key issues include the complexity of procedures associated with public partnerships, extensive documentation requirements for accountability, differing interpretations of rules across government bodies, and the need for specialised technical capacities in financial and legal management. The study also highlights that these requirements tend to affect smaller or territorially rooted organisations more intensely, as they often have limited administrative structures, which can hinder their participation in public calls, the management of multiple funding streams, and the institutional sustainability of their activities.

3. Accessible and sustainable resources

Brazilian CSOs continue to [face structural sustainability constraints](#) that go beyond “fundraising,” including institutional capacity, political context, and reputational factors that shape their ability to mobilise resources over time.

[Recent sector analyses](#) reinforce that financial sustainability remains a central bottleneck for a significant number of CSOs, particularly smaller and territorially based organisations with limited access to diversified funding streams.

In [environmental and climate-linked agendas](#), the scale of national mechanisms associated with restoration and conservation continues to expand, which can generate important programmatic funding windows relevant to CSOs working on territories and rights-based approaches. BNDES' "[Restaura Amazônia](#)" explicitly mobilises BRL 450 million (ca. 75 million Euro) from the Amazon Fund (plus additional captured resources), illustrating the continued relevance of large thematic funds for ecosystem restoration and associated civil society implementation capacity.

In sum, the 2026 update for Principle 3 indicates continuity in structural sustainability challenges, combined with incremental opportunity channels (domestic giving growth, endowments, climate-linked funding windows) and a stronger emphasis on digital transformation as an enabling [operational strategy](#).

Finally, media reporting in 2026 suggested that [external funding contractions](#) (notably reductions linked to U.S. resources) could increase pressure on CSOs, particularly affecting humanitarian operations in Brazil, and amplify the importance of predictable domestic partnership rules and diversified funding channels.

4. State openness and responsiveness

Brazil's federal participation architecture continues to rely on [legally institutionalised participation bodies](#) and digital channels that connect civil society to policy processes.

Brazil also remains engaged in global open-government coalitions through the **Open Government Partnership (OGP)**. In November 2025, the **Government of Brazil** assumed the role of **OGP Steering Committee Co-Chair (2025–2026)**, sharing leadership priorities for the partnership.

There has been continued regular updating of the databases of the Federal Transparency Portal, including budget execution, transfers, and federal expenditures, as well as the ongoing availability of downloads in open formats, thereby preserving the conditions for social monitoring, data reuse, and external oversight.

During the same period, [an updated version of the ComunicaBR portal was launched](#), aimed at providing a territorialised presentation of federal public policies and investments at the municipal level. Although it does not replace the core instruments of fiscal transparency and access to information, the initiative reinforces the digital environment for the dissemination of public data and signals an incremental trend toward improved usability and integration of

government information. In terms of data governance and digital transformation, the updates observed are characterised more by consolidation and maintenance of the existing infrastructure than by disruptive normative or technological changes.

A significant participation-related legal development is the formal inclusion of CSO representation in Conitec (SUS health technology assessment), established by Law No. [15,120/2025](#). This inclusion is operationalised through updates to Conitec's governance rules in Decree No. 12,716/2025, [which amends the underlying framework](#) originally set by Decree No. 7,646/2011.

In January 2026, [Conitec reopened applications for CSO](#) representatives because instability in the “Brasil Participativo” platform (15–17 December 2025) affected the application process, extending the deadline and reiterating the procedural and documentary requirements for participation. [This episode](#) illustrates a practical constraint in participation arrangements: even when participation is formally guaranteed, access can be shaped by platform reliability and administrative gatekeeping capacity.

Concerns about state openness and participation have also been raised in relation to [Provisional Measure No. 1,318/2025 \(MP 1318/2025\)](#). The measure, passed in September 2025, creates a special tax regime (ReData) to attract large-scale investment in data centres that would be build across the country, including in indigenous territories. Civil society organisations and Indigenous rights advocates have pointed to the absence of free, prior and [informed consultation \(FPIC\) with Indigenous peoples](#) during the formulation of the measure, despite its potential impacts on territories and communities. The episode has been cited as an example of gaps between formal commitments to participation and the effective inclusion of affected groups in decision-making processes.

5. Political Culture and Public Discourses on Civil Society

Public debate about civil society in Brazil continues to be shaped by polarised narratives that alternately frame [CSOs/NGOs as essential public-interest actors or as entities requiring heightened suspicion and control](#).

At the same time, civil society and allied actors have invested in reputation-building and advocacy initiatives aimed at reinforcing the public role of CSOs. Among the examples already mentioned in previous reports are the [“Sociedade Viva”](#) initiative and the creation of the [Parliamentary Front in Defence of CSOs](#), both intended to expand the sector's presence and defence in the public sphere.

In this context, in February 2026, [Abong relaunched Rede Cardume](#), an initiative that brings together grassroots communicators and civil society organisations to strengthen coordinated communication efforts in defence of rights. The initiative seeks to develop proactive agendas and strategies that move beyond merely defensive approaches, broadening the reach of CSO narratives, particularly in the face of disinformation and attacks against the sector.

Finally, [information disorder](#) remains a structural feature of Brazil's civic and political communication environment, with direct implications for public trust in NGOs and for the safety and legitimacy of advocacy in contested policy areas such as climate and environment.

In 2025, Brazil was publicly associated with multilateral efforts to address climate disinformation at [COP discussions](#), underscoring that mis/disinformation is increasingly treated as a governance problem rather than only a communications challenge. Civil society organisations have also publicly called for platform accountability and policy responses to disinformation (including [climate-focused disinformation](#)), linking the issue to rights protection and to the enabling environment for civic action.

6. Access to a secure digital environment

Brazil's legal framework for a secure digital environment continues to rely on the [Civil Rights Framework for the Internet](#) (Marco Civil da Internet, Law No. 12,965/2014), and, with regard to personal data protection, on the [General Data Protection Law](#) (LGPD, Law No. 13,709/2018). At the institutional level, the [National Data Protection Authority \(ANPD\)](#) continues to consolidate its enforcement capacity and has [published research](#), deliberations and votes that reflect its [operational practice and the use of sanctioning instruments](#), including the imposition of daily fines to ensure compliance with its determinations.

Brazil continues to use technical transparency tools, such as the public incident statistics portal maintained by [CERT.br](#). The statistics published by CERT.br enable evidence-based monitoring of incident categories and trends that may affect the confidentiality, integrity, and continuity of digital services. At the same time, the multistakeholder model of internet governance remains a pillar of the digital environment in the country, with [CGI.br](#) playing a relevant role in strategic debates on rights and online security. In January, for example, CGI.br published a [proposal](#) on age verification on the internet, presenting seven recommendations for the age assurance mechanism foreseen in the Digital ECA.

According to the [TIC Domicilios 2024 survey](#), 84% of the population aged 10 or older uses the Internet, corresponding to approximately 159 million people in the country. At the household level, 83% of Brazilian households have Internet access, remaining stable compared to the

previous year. Among connected households, 71% use fixed broadband, predominantly through fibre optic or cable connections (65%), while 14% access the Internet through mobile networks (3G/4G/5G). However, significant inequalities persist in the quality of connectivity, the type of access, particularly the dependence on mobile phones, and the relative cost of services. These factors significantly influence the concrete conditions for digital participation and the functioning of the enabling environment in the country.

During the current reporting period, no additional substantial regulatory changes related to the operation of satellite internet infrastructure in Brazil were observed. Nevertheless, [the previously authorised expansion of the Starlink](#) constellation has continued to fuel regulatory and public policy debates. In recent months, discussions have mainly focused on the implications of [the rapid expansion of private satellite connectivity providers](#), reflecting a broader challenge of balancing connectivity expansion with safeguards related to digital sovereignty, regulatory capacity, and the resilience of national communication infrastructures. Overall, the 2026 snapshot for Principle 6 indicates continuity in the core legal pillars ([Marco Civil](#) + LGPD), combined with meaningful jurisprudential change on platform liability and ongoing measurement of cyber threats through CERT.br, while digital inclusion evidence remains central for understanding differential exposure to online risks.

Challenges and Opportunities

Recent reports indicate that reductions in external funding flows, particularly those linked to resources originating from the United States, may place pressure on civil society organisations throughout 2026. For many organisations, these resources are essential to maintain staff, programmes and their presence in communities. In the coming months, it will be important to prioritise flexible and predictable support, as well as initiatives aimed at resource diversification, helping to sustain the work of these organisations and strengthen their institutional sustainability.

Issues such as digital platform regulation, data protection and age verification online, addressed in a proposal published by CGI.br in January 2026, are likely to remain central in public debate. These discussions have a direct impact on the communication and mobilisation spaces used by civil society organisations and social movements. Supporting the meaningful participation of civil society in these processes can help ensure that digital policies take into account their implications for rights, freedom of expression and civic communication.

In a context marked by political polarisation and the spread of disinformation, recent initiatives, such as the relaunch of the Cardume Network by Abong in February 2026, highlight the importance of strengthening collective communication strategies among civil society

organisations. In the coming months, supporting efforts that increase the visibility of organisations, promote the sharing of experiences and address stigmatising narratives can contribute to a more enabling public environment for civil society action.

In the face of financial constraints and institutional challenges, the consortium can play an important role in the coming months by connecting Brazilian organisations with funders, thematic networks and international partners. By facilitating these linkages and giving visibility to initiatives already led by organisations, it is possible to expand opportunities for collaboration, learning and access to resources aligned with locally defined priorities.

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