RELATO TÉCNICO

ENVIRONMENTAL POLICY DISMANTLING AND UNDOING OF BUREAUCRATIC CAPACITIES IN BRAZIL

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Abstract

This work analyzes street-level bureaucrats' action in the implementation of environmental policy in Brazil, taking as case studies the IBAMA inspectors and ICMBio agents, before and after the beginning of President Bolsonaro's term. A theoretical model was developed that integrates three different analytical dimensions of street-level bureaucrats' action: institutional, individual and relational dimensions. Based on this, a case-oriented investigation was conducted, where significant cases were selected to illustrate two different profiles of environmental agents (cross-case analysis). The information obtained was analyzed using Systematic Content Analysis (SCA). In addition, a cross-time poll was conducted on the institutional changes that occurred before and after the of Bolsonaro´s administration. The results show comparatively between IBAMA inspectors and ICMBio agents how they are articulated, with their peculiarities in each of the institutions. The changes undertaken by the Bolsonaro administration currently have led to the freezing of bureaucratic capacities, the weakening of institutions in Brazil.

Keywords

Implementation of Environmental Policy. Street-level Bureaucrats' Capacities. Brazilian Institutions. Policy Dismantling.

1 Introduction

The aim of this work is analyze street-level bureaucrats' (SLB) action in the implementation of Brazilian environmental policy, taking as case studies the agents working in the two main agencies operating in this area, before and after the beginning of President Bolsonaro's term.

To test the analytical model adopted in this research, the implementing agent of the Brazilian environmental policy that operates in the Amazon region was chosen. To this end, we interviewed twenty-eight SLBs working in the two main federal environmental public institutions: Brazilian Institute for the Environment and Renewable Natural Resources (IBAMA) and the Chico Mendes Institute for Biodiversity Conservation (ICMBio).

The unit of analysis adopted in this work is implementation Brazilian environmental policy within the scope of federal competence, focusing on the prevention and control of deforestation (IBAMA Inspector) and the management of Federal Conservation Units (ICMBio Agent). In both cases, limit the analysis of the action of these agents to the Amazon region, a big territory in terms of biodiversity living with the highest rates of deforestation recorded in the country.

The IBAMA Inspector and the ICMBio Agent, although both are SLBs active in the defense of the environment and have similarities in terms of skills, training, and modalities of entry into public service, have differences with respect to the main routines developed daily, the mode of operation, and the territorial delimitation of the respective function. The IBAMA Inspector acts as an environmental policeman, directing his/her action to the repression of crimes and other environmental illegalities; while the work of the ICMBio Agent is more focused on managing

the Federal Conservation Units (FCUs), caring for relations with traditional populations, as well as collectively the sustainable use of natural resources.

Another aspect that is being observed in this work is related with the current Brazilian institutional moment, in view of the anti-democratic and anti-environmental status of the Bolsonaro administration. This aspect cause limitation in the action of SLBs because of the intentional violation of legal norms that secure implementation Brazilian environmental policy. With regards to the structure of this paper, apart from this Introduction, an overview of the evolution of Brazilian environmental policy is presented in the following section. The third section brings the presentation of the analysis model of the SLBs' action in the environmental area and the two research hypotheses. In the fourth section, the methodological procedures are described. The fifth and sixth sections discuss the results of the research, comparatively IBAMA and ICMBio SLBs acting and the examination of the dismantling brazilian environmental policy after the Bolsonaro administration. The last section weaves final remarks.

2 The Construction and Dismantling of Brazilian Environmental Policy

The 1988 Federal Constitution represents the main milestone in the process of strengthening the institutions of Brazilian environmental policy, as it gave an even greater impetus to the creation of new laws, regulations, and regulatory agencies. From the constitutional recognition of the environment as an asset for common use by the people, to be defended and preserved by the State and the community, the path of environmental laws and regulations has been consolidated, in line with the international agreements stipulated by Brazil. Among the approved laws, it is worth mentioning Law No. 7,735/1989, which created IBAMA; Law No. 9,605/1998 (Environmental Crimes Law), which represents the main legal reference in the federal sphere about environmental inspection, inhibiting environmental crimes and infractions; Law 9,985/2000, which creates the National System of Nature Conservation Units; Law 11,516/2007 that creates the ICMBio, which assumes part of the assets, resources, personnel, positions, and functions originally linked to IBAMA; and Law 12,187/2009, which defines the National Policy on Climate Change, containing both the consolidation of protected areas and the plans to combat deforestation, under the Action Plan for the Prevention and Control of Deforestation in the Legal Amazon, approved by Presidential Decree in 2003.

Despite advances in the legal framework and in the commitments assumed by Brazil before the international community, in the Amazon region, pressure persists from political and economic agents who understand the occupation of indigenous and public lands as an obstacle to economic growth, contrary to the principles of development sustainable

The signs of the crisis of Brazilian democracy, begin with the victory of the current President Bolsonaro. In its first two years in office, the Bolsonaro administration accelerated the process of eroding the State from within, weakening institutions – especially those linked to the executive branch – and dismantling public policies in the areas of education, culture, citizenship, human rights and the environment. This process culminated in the Covid-19 crisis, which Bolsonaro accentuated his denialist attitude towards the principles of science in dealing with the pandemic.

Thus, since 2019, the actions of the Ministry of Environment, denialist ideology on climate change, are guided by a government program aimed at dismantling environmental policies by weakening or even annihilating the responsible institutions, as happened with the extinction of the Secretariat of Climate Change and Forests. Among the most striking events, the following are worth mentioning: the disqualification of the data provided by the National Institute for Space Research (INPE) on deforestation and the exoneration of the president of this institute by the government, still in 2019; the stimulus for wildfires, deforestation, illegal logging, occupation of indigenous lands and Conservation Units, and clandestine mining, as well as attacks on international agreements on climate change; the flexibilization of environmental norms by means of infra-legal acts and the presentation of bills that are very harmful to the environment, such as Bill 3,729/2004, to simplify the procedures for granting environmental licenses, and Bill 2,633/2020, the so-called land-grabbing bill, on land regularization of improper occupation of public lands; and, also, the removal of civil servants occupying senior positions, especially in IBAMA and ICMBio, replaced by political and/or military agents with ideological positioning aligned with the vision of the current Government, with the consequent emptying of the teams dedicated to environmental inspection and weakening of the governance of the Conservation Units (SEIXAS et al., 2020).

3 Analysis Model and Research Hypotheses

Based on the distinct positions found in literature, we three analytical dimensions were placed in a dialectic relation, which provided a view beyond the limitations of each one and their contribution towards an advance in knowledge on the topic (BONELLI et al, 2019).

With this goal, we took a study by Lima and D'Ascenzi (2013), which proposes a more fluid understanding of the concept of implementation, which could be understood as the result of the interaction between the set of guidelines expressed in a plan and the elements that define the actual context, including power relations established in the workplace. From this viewpoint, the implementation process may generate new insights that are capable of improving and shaping

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the proposals initially set out in the plan to the local context, so that plans and regulations can be conceived, in a more flexible way, as socially constructed objects, potentialities of intentions to be tested, continually interpreted, adapted and improved by the actors involved (MAYNARD-MOODY & MUSHENO, 2012, 2015; LOTTA, 2014, 2018).

All this makes it possible to understand how, within a complex system such as the implementation of environmental policy, the institutional dimension is confronted and renewed, in a dialectical tension with the individual action – or agency – and with the multiple relationships established inside and outside a given organizational environment. Therefore, we include, in the analysis, the agency of individuals and networks of organizations and agents that make up the system, from the point of view of their individual interactions.

Based on an understanding of the above studies by Lima and D'Ascenzi (2013), Majone and Wildavsky (1984), Barrett (2004), we understand that central concepts from literature on implementation. A critical re-reading of these concepts enables us to approximate the theoretical approaches on which they are based, thereby justifying an integration of the institutional, individual and relational dimensions in a single analytical model, where the three dimensions can influence each other, both towards their strengthening and weakening.

From the theoretical construct presented in the article by Bonelli et al. (2019). For the institutional dimension, the indicators formal rules and informal rules were chosen (MARCH AND OLSEN, 2006; NORTH, 1990; HODGSON, 2006). Regarding the individual dimension, it was decided to simultaneously contemplate intrinsic incentives, extrinsic incentives, and values, because we understand that agents' behaviors are not necessarily motivated by cost-benefit calculations, as pointed out by Agency Theory (FAMA & JENSEN, 1983; MOE, 1984; DAVIS, SCHOORMAN, & DONALDSON, 1997). We believe that the same agents, depending on contingencies, may adopt, in a given circumstance, opportunistic behaviors and, in another circumstance, cooperative behaviors, without necessarily being altruistic. As for capacities, we consider that public agents, in addition to technical-administrative capacities, they must also have political-relational capacities, which relate to the skills of interlocution, conflict negotiation and consensus building (PIRES & GOMIDE, 2016). As for the relational dimension, the indicators institutional relations, inter-institutional relations, and alignment of interests were inserted; on the other hand, the indicator reciprocal learning was maintained (BONELLI et al., 2019).

Thus, in order to analyze the action of SLBs in the implementation of Brazilian environmental policy, we adopted the model, reported below in Figure 1, to test, at the empirical level, whether

the norms and structures defined in the environmental policy, as well as informal rules and political-institutional factors, the agents' individual conducts and their mutual interactions, jointly ground the implementation of Brazilian environmental public policy.

Therefore, it is presumed that:

Hypothesis 1: Adherence to established rules, adoption of informal rules, containment of political-institutional factors, SLBs' individual conducts and their interactions jointly ground the implementation of Brazilian environmental public policy.

Figure 1 – Analysis model of environmental street-level bureaucrats' action
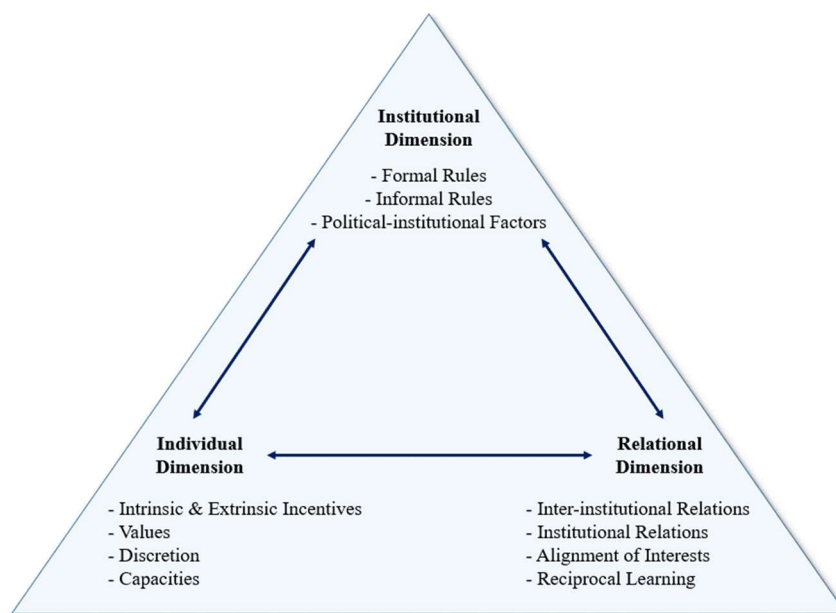
Source: prepared by the authors, based on the research results.

On the other hand, it is also necessary to understand the dynamics of disruptive change that lead to institutional weakening and, after a certain degree of erosion of the founding dimensions of the SLBs' action, the dismantling of the environmental policy. This process, despite the possible resistance from the agents, is translated, in fact, into the disabling of structures and programs, the loss of individual and institutional capacities – due to the appointment of political allies for senior positions, regardless the lack of the necessary technical and relational skills (*aparelhamento*) –, and the emptying of institutional and inter-institutional relations (BAUER & BECKER, 2020). In the case of environmental policy, the empirical investigation conducted in this paper allowed us to identify the existence of institutional structures eroded and deviated from the mission of preserving the Amazon.

Therefore, from the understanding of the constitution of the founding elements of Brazilian environmental policy, the model needs to be dynamically directed to understand, also, how the

opposite process occurs, that of dismantling, which corresponds to the corrosion of the institutional, individual and relational dimensions. This dismantling process is expressed in deregulation, in the weakening of federal environmental institutions, in the disconnection of individual action from motivations, values, and principles of environmental norms, in the freezing of individual and organizational capacities, in the distortion of the SLBs' discretionary power, and in the emptying of networks of institutional and inter-institutional relations.

Thus, by identifying the distortions of the foundational elements of the SLBs' daily actions and their effects, the model allows us to understand how the process of disruptive change takes place (BAUER & BECKER, 2020), which, in the context proposed for this paper, leads to the hypothesis of the dismantling of the Brazilian environmental policy.

In this sense, we observe that the performance of frontline bureaucrats in the process of implementing Brazilian environmental policy assumes different trajectories, due to the consolidation, or not, of institutional structures, individual action and interpersonal relationships, and according to how these elements influence each other reciprocally. Thus, depending on the level of development and strengthening of these dimensions, the action of federal environmental agents oscillates between the fulfillment of the institutional mission, resistance in maintaining operations – despite contradictory orders – and, at the other extreme, weakening that leads to conducting operations of limited impact or even inaction.

Thus, it is possible to relate the types of behaviors identified from the primary data extracted from the interviews conducted with IBAMA and ICMBio SLBs with the categories defined by Bauer et al. (2021) on the reaction of the bureaucracy when faced with an active dismantling strategy conducted by populist governments (BAUER & KNILL, 2014). According to Bauer et al. (2021), civil servants, confronted with this situation, can react in three separate ways: working, shirking, and sabotage. In the first case, agents, more politically aligned to the government, scrupulously follow the orders received by their superiors; on the other hand, in the second and third cases, respectively, they avoid confrontation, seeking exit strategies, or resist attacks aimed at dismantling structures, resources, personnel, norms, and accountability relationships of public institutions (BAUER ET AL., 2021).

Therefore, the theoretical argumentation developed so far allows the construction of the second research hypothesis, presented below:

Hypothesis 2: The corrosion of the institutional dimension, due to deregulation and appointment of unskilled political allies for senior positions (*aparelhamento*) in IBAMA and ICMBio, causes the weakening of the individual dimension, with the freezing of bureaucratic capacities,

and of the relational dimension, with the disarticulation of partnership networks, leading to the systemic dismantling of the implementation of Brazilian environmental policy.

4 Data and Methods

The research strategy was case-oriented, that is, aimed at deepening the underlying relationships among cases selected for their significance for the understanding of the phenomenon.

A cross-case analysis was performed to examine the action of two different profiles of SLBs operating in the context of Brazilian environmental policy: the IBAMA Inspector and the ICMBio Agent. These two categories of agents were deliberately selected because they differ in terms of role, activities, *modus operandi*, and territorial delimitation of their function.

The temporal cut of this research was the period 2004-2021, for IBAMA, and 2007-2021, for ICMBio, focusing on the comparison between the first three years of the Bolsonaro administration and previous mandates.

The techniques used for data collection were semi-structured and in-depth interviews and documentary research. The script, built from the analysis model, was adapted according to the two different interviewee profiles and was used as a guide to let the field speak and to orient the researchers' work.

Documents such as laws, decrees, regulations, reports, and other relevant files were used throughout the document analysis, to corroborate the primary data obtained in the interviews, using the triangulation technique (DENZIN & LINCOLN, 2005).

The texts of the interview transcripts were examined using Systematic Content Analysis (SCA), based on the procedures described by Hall & Wright (2008) and Salehijam (2018), with adaptations depending on research objective and data available.

The SCA was articulated in the following steps: a) selection of cases by convenience, using the "snowball" technique; b) coding of texts, adopting consistent criteria to ensure reproducibility; c) analysis of coded; d) analysis of coding frequencies by means of descriptive statistics.

Twenty-eight interviews were conducted from March 2019 to September 2020. The number of interviewees was not calculated *a priori* according to sampling criteria, but as many individuals as necessary participated, until reaching the theoretical saturation of the indicators of the analysis model. The participants freely made their statements under the condition that their identities and personal data would be kept confidential.

5 Environmental Policy Implementation in Brazil: comparing the cases of IBAMA and ICMBio SLBs

The Figure 2 below shows how the total percentage frequencies of each indicator of the analysis model are distributed among the interviewees from the two institutions. The total percentage values attributed to IBAMA and ICMBio were calculated from the average of each indicator observed in the fourteen cases of each institution, obtained in all twenty-eight interviews conducted. The spheres are drawn in proportion to the total percentage value of each indicator. For comparative purposes, in the observation of each indicator between the two institutions, the overlapping sphere is the one associated with a higher percentage frequency.

Figure 2 – Distribution of indicators frequencies comparing the cases of IBAMA and ICMBio
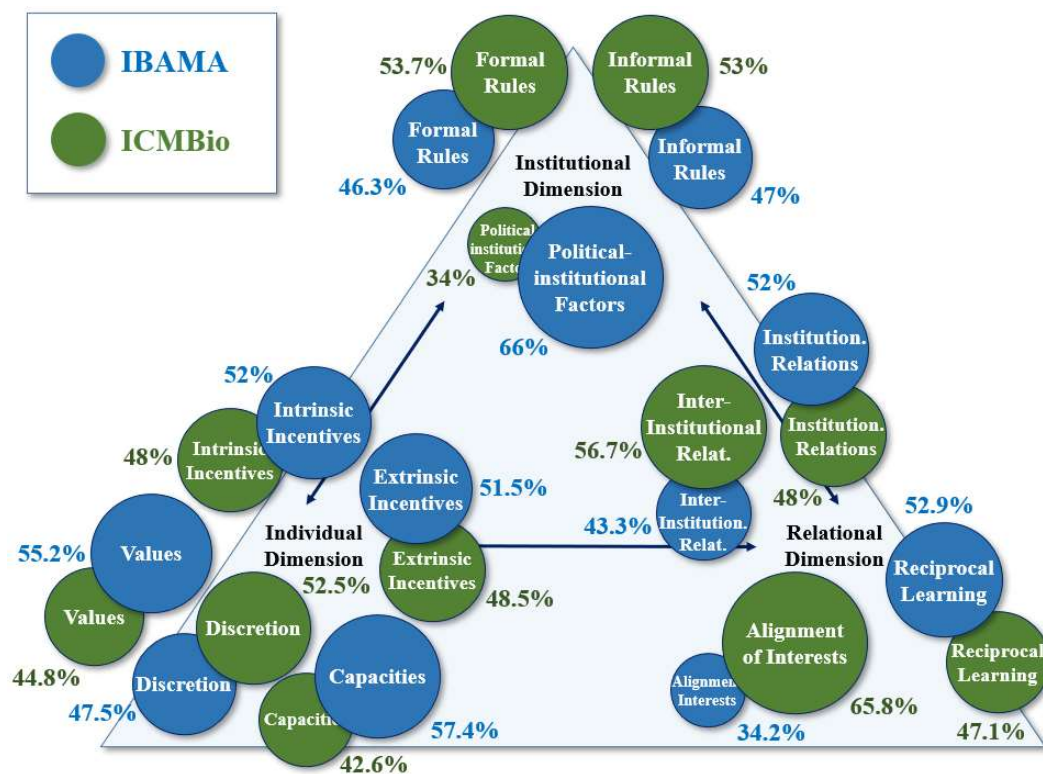
Source: prepared by the authors, based on the research results.

Observing the aggregated data of the indicators of the **institutional dimension**, it is worth noting the concentration of political-institutional factors in IBAMA (66%) in comparison to ICMBio (34%). The Inspectors of IBAMA emphasized, in their statements, the impact of political pressures internal and external to the entity, on enforcement actions; on the other hand, the performance of ICMBio Agents – characterized by more heterogeneous activities – does not seem to be so affected by the behaviors of political agents, according to the reports of the interviewees.

Moving on to analyze the data related to the indicators of the **individual dimension**, the elements that present the greatest discrepancies between the cases of IBAMA Inspectors and

ICMBio Agents are capacities and values, since the former are distributed in the proportions of 57.4% for IBAMA and 42.6% for ICMBio; and the latter reach, respectively, 55.2% and 44.8%. In fact, in IBAMA Inspectors' statements, greater emphasis was placed on the importance of capacities (technical-administrative and political-relational), on the role of values, and on the influence of both categories on their actions, especially during inspection operations. In the case of ICMBio Agents, it results that, due to the nature of their work – which includes socio-environmental management as a fundamental component, in addition to other quite heterogeneous tasks –, on the one hand, the baggage of capacities does not need to reach the same level of specialization as that of IBAMA Inspectors; on the other hand, the set of individual values are less predominant, mainly due to the fact that the Conservation Unit managers are socially inserted, in a stable way, in the community where they work and, therefore, by the need to put collective interests before individual ideals and beliefs. The intrinsic and extrinsic incentives show a slight predominance of the concentration of these indicators in IBAMA (around 52.0%), in comparison with Chico Mendes Institute (around 48%). The civil servants at ICMBio, in their statements, a greater propensity to stick to formal and informal rules, in their day-to-day activities, resort heavily to the use of discretionary power, due to the exercise of functions related to environmental education and socio-environmental management, activities which require dialogue, negotiations, consensus building, and reaching agreements among the various stakeholders.

As for the evaluation of the results of the **relational dimension**, the aggregated data show, in general, the highest concentration of indicators in the cases of the ICMBio, because the action of its agents, compared to IBAMA's Inspectors, is less focused on enforcement and more prone to weaving inter-institutional relationships. The indicators alignment of interests and inter-institutional relations clearly reveal this characterization, since, for the ICMBio, the percentages reach 65.8% and 56.7%, respectively, against 34.2% and 43.3% registered in the cases of IBAMA. On the other hand, in the latter institution, there is a prevalence of relationships established with professionals from the same institution (52.0% versus 48.0% for ICMBio). This aspect is quite characteristic of the work of IBAMA Inspectors, who, when working in teams composed of SLBs from different states, need to develop a strong cohesion within the team, as well as promote an intense exchange of knowledge. Finally, the reciprocal learning indicator, which in the case of IBAMA reaches a percentage of 52.9% (47.1% in the case of ICMBio), is due precisely to the greater intensity that the inspection work of the first institution requires in terms of the exchange of experiences and technical knowledge within their teams.

The Table 1 below summarizes the main elements that define the SLBs' action in Brazilian environmental policy in each of these institutions, with their respective peculiarities:

Table 1 – Summary of the comparative analysis between the IBAMA and ICMBio cases

IBAMA	ICMBio
▪ The political-institutional factors have a greater influence on the actions of IBAMA SLBs ▪ The capacities, values and, to a lesser extent, the incentives show a greater incidence from the point of view of IBAMA Inspectors ▪ Institutional relationships prevail due to the relevance of knowledge exchange between the Federal Environmental Agents coming from different regions of Brazil for the execution of environmental inspections ▪ IBAMA Inspectors more often use the institutional doctrine, the baggage of skills and the guidance of the team coordinators	▪ Formal rules, informal rules, and discretionary power have a similar weight between the two institutions, with a slight predominance at the ICMBio ▪ At the ICMBio, inter-institutional relations have a greater influence compared to institutional relations, coherently with the performance of its Agents, whose actions require building consensus with other public entities, communities, local producers, and other socio-economic agents ▪ The work inside the institution is developed in a more individualized way and seems less permeated by team spirit

Source: prepared by the authors, based on the research results.

It is worth noting that, in addition to the effort made in this research to observe each of the indicators and their effects on the actions of the SLBs of both institutions, the results of the Systematic Content Analysis jointly pointed out the existence of relationships between the indicators, within the same dimension and between different dimensions. For example, in both entities, the intrinsic incentives are strictly linked to the set of values of the environmental agents (identification of the individual ideal of defending nature with the institutional mission); the degree of discretion adopted in environmental enforcement correlates with the technical and relational capacities of the agents (knowledge of the legislation and ability to apply the rule to the factual situation); and the environmental policy enforcement benefits from the ability to apply informal rules and routines that favor the adaptation of formal rules to the specific situation and/or the local context, as long as the principle of legality is not contradicted.

The set of empirical evidence shows that, despite the specificities of IBAMA and ICMBio, the institutional, individual and relational dimensions and their respective indicators are compatible with each other, define concomitantly, and ground the action of the bureaucrats who implement the Brazilian environmental policy in both institutions, <u>confirming the first research hypothesis</u>.

6 Brazilian Environmental Policy Before and After the Beginning of Bolsonaro Government

In addition to comparing the performance of frontline agents working in the two institutions studied, this research also observed elements that allowed us to evaluate the environmental policy transformations that occurred before and after the beginning of the Bolsonaro

government. This aspect is related to the changes implemented by this government regarding the institutional dimension, with repercussions on the individual and relational dimensions, such as changes in infra-legal norms, attempts to reform legislation, political pressure on public agents, dismissals of public servants trained in the fight against deforestation and environmental preservation, and the appointment of military personnel without the necessary expertise. This is straightforward evidence of strategies of populist public administration policy, whose objectives are oriented towards dismantling, coherently with what was pointed out by Bauer and Becker (2020) about democratic backsliding caused by populist governments.

In most interviews conducted, two conceptual categories emerged, without being directly asked to the participants, namely "dismantling of the environmental policy" and "institutional weakening" of the main entities responsible for implementing the environmental agenda. Whether before or after the beginning of the Bolsonaro government's mandate – and the condition of each interviewee regarding the continuity, or not, in the exercise of the respective senior position, if any. Thus, the dummies "environmental policy dismantling" and "institutional weakening" were gathered in the following Table 2, along with the dummies referring, respectively, to the "before/after Bolsonaro" and the "removal from senior position", for each of the interviewed SLBs.

Table 2 – Poll on institutional changes in environmental policy "before and after Bolsonaro"

Case	Environmental policy dismantling	Institutional weakening	Removal from senior position	Before/After Bolsonaro
IBAMA Total	13	14	6	13
IBAMA Frequency	92.8%	100%	42.8%	92.8%
ICMBio Total	6	12	2	7
ICMBio Frequency	42.8%	85.7%	14.3%	50%
Overall Total	19	26	8	20
Overall Frequency	67.8%	92.8%	28.6%	71.4%

Source: prepared by the authors, based on the research results.

The data on the interviewees' perception of institutional changes in environmental policy, before and after the beginning of the Bolsonaro government, summarized in Table 2 as "Before/After Bolsonaro", show that in IBAMA there is a strong alignment between the Inspectors who evaluate that there is a process of environmental policy dismantling and those who state that this process began with the advent of the Bolsonaro government, as the respective dummies both show the same value (92.8%). It was possible to observe the same alignment in the ICMBio Agents, but to a much lower degree, with the values of the dichotomous variables deconstruction of environmental policy and before/after Bolsonaro corresponding, respectively,

to 42.8% and 50%. Thus, if it is possible to state that almost all the IBAMA Federal Environmental Agents see the deep institutional changes undertaken by the current government in environmental policy and its deleterious effects, on the other hand, in the Chico Mendes Institute, the SLBs are quite divided on this issue.

Regarding institutional weakening, it can be argued that IBAMA Inspectors are unanimous about the occurrence of this phenomenon in the Brazilian environmental area (100%) and that the vast majority of ICMBio Agents have a similar position (85.7%), but without necessarily linking this process to the actions of the Bolsonaro government.

According to the results of the cross-time poll conducted in this research, the impact of the Bolsonaro government in the removal of civil servants holding senior positions has been greater in IBAMA than in ICMBio (42.8% and 14.3% of respondents, respectively). We consider that this may have had repercussions on the participants' opinions regarding the evaluation of the institutional changes made and their effects.

As for the aggregated data, it is relevant to note that, according to 92.8% of the respondents, there is an ongoing process of institutional weakening in the environmental area, which, for most of these respondents (71.4%), can be attributed to the actions of the Bolsonaro government. Similarly to what was put about the data from the IBAMA cases, there is also an alignment, at the aggregate level, between the SLBs who believe in the dismantling process of environmental policy and those who understand that this process began after the start of the Bolsonaro administration, as the present, respectively, the values of 67.8% and 71.4%.

This results of the "before/after Bolsonaro" cross-time poll data collected in this research will be further explored for upcoming publications toward identifying information that will allow capturing the type of reaction expressed by the environmental agents interviewed, in the face of the active dismantling promoted by the Bolsonaro government, whether it fits as shirking, sabotage, working, or other categories emerging from the fieldwork (BAUER et al., 2021).

In effect, we are currently witnessing in Brazil a process of undoing public policies, not only in the environmental area, which, far from being simply the expression of the inaction of a government contrary to the policies built since redemocratization. It is a work of dismantling and sabotage of already consolidated policies, by a management that, acting apparently within the framework of legality, repeatedly deteriorates the institutions.

The dismantling of the Brazilian environmental policy is represented through a version of the model capable of capturing the current reality (Figure 3 below), which contemplates the distortions that occurred in its elements after of the Bolsonaro administration.

Figure 3 – Dismantling of Brazilian environmental policy (realistic version of the analysis model)
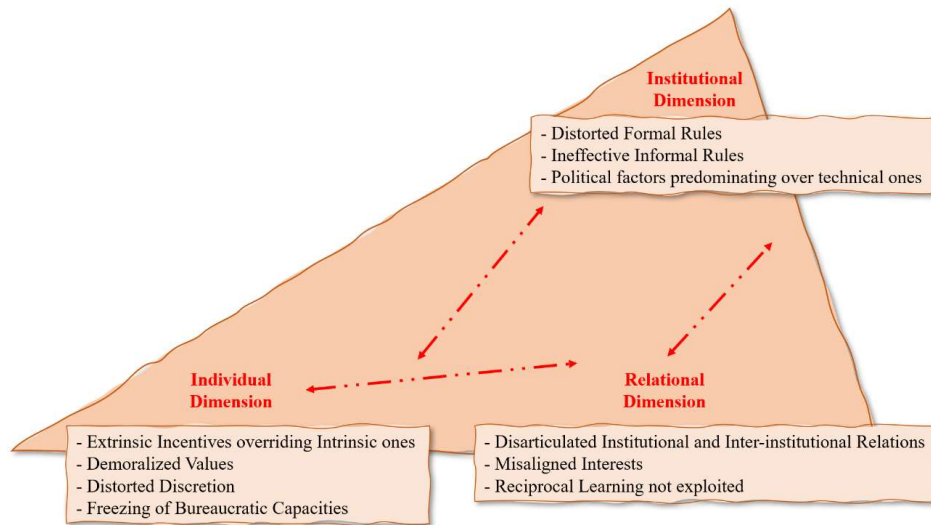
Source: prepared by the authors, based on the research results.

The result of this deconstruction of the fundamental dimensions of the SLBs' action is the progressive corrosion of the two main Brazilian environmental agencies and the dismantling of the system of environmental governance, which currently presents itself with its deformed structure and the functioning mechanisms, <u>confirming the second research hypothesis</u>.

7 Final Remarks

The results of the research showed that, despite the dismantling of the environmental policy underway, the pillars of the SLBs' actions continue to resist, even if hidden or latent. It is understood that capacities at the individual and organizational level, as well as institutional and inter-institutional relations have the potential to be reactivated. Here remains the question, to be addressed in future research, about how and under what conditions it will be possible to put the structures and mechanisms of Brazilian environmental policy back into operation.

This paper has shown how important it is for Brazilian environmental governance to keep solid institutions, incentives, values and individual capacities and partnership networks functioning. The integration of all these elements allowed that, in the thirty years following the promulgation of the Federal Constitution, great advances were registered in the incremental construction of the Brazilian environmental policy. However, it was empirically observed that only three years of Bolsonaro were enough to destroy the progress made in previous administration. This shows that there is still, in Brazil, the need to (re)build an environmental governance capable of resisting the attacks of anti-democratic governments and, more broadly, independent of the political-party influence of the administration in power.

From the set of results presented, it is understood that, although the diffuse right to the

preservation of the environment is constitutionally recognized, the Brazilian environmental policy still lacks stricter regulation, in the sense of consolidating the role of the professional bureaucracy, guaranteeing a substantive autonomy of the agencies that execute environmental policy, and establishing mechanisms to encourage territorial planning and sustainable productive activities.

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