

GOVERNANCE OF THE AMAZON FUND TO COMBAT DEFORESTATION IN THE AMAZON FOREST

GOVERNANÇA DO FUNDO AMAZÔNIA PARA O COMBATE DO DESMATAMENTO NA FLORESTA AMAZÔNICA

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Abstract

The objective of the article is to verify which characteristics of the Amazon Fund's governance would reduce its instability in the face of changes in government. The study is original and socially relevant, especially given the fact that Brazil is the world's largest recipient of Reducing Emissions from Deforestation and Forest Degradation (REDD) resources. Qualitative research, with a case study on the Amazon Fund, and three propositions were developed, under the theoretical lens of Governance Theory. Sixteen people linked to the Amazon Fund were interviewed and the data was coded and categorized using the ATLAS.ti 9 software, with discussion and content analysis, and presentation of the results. The results determined that the Amazon Fund was created by a State Policy, but its functioning depends on government ideologies and intentions at a given moment, and may suffer interference, but if the rule for its creation is changed into law, it will be able to remain integrity in its management throughout

Resumo

O objetivo do artigo é verificar quais características da governança do Fundo Amazônia reduziriam sua instabilidade ante às mudanças de governo. O estudo é original e socialmente relevante, sobretudo pelo fato de que o Brasil é o maior receptor mundial de recursos de Redução de Emissões por Desmatamento e Degradação Florestal (REDD). Pesquisa qualitativa, com estudo de caso sobre o Fundo Amazônia, e foram elaboradas três proposições, sob a lente teórica da Teoria em Governança. Entrevistou-se dezesseis pessoas ligadas ao Fundo Amazônia e os dados foram codificados e categorizados, no software ATLAS.ti 9, com discussão e análise de conteúdo, e apresentação dos resultados. Os resultados determinaram que o Fundo Amazônia foi criado por uma Política de Estado, mas seu funcionamento depende de ideologias e intenções do governo em determinado momento, podendo sofrer interferências, mas se a norma de sua criação for alterada para lei, poderá se



governments. With the responses to the propositions, a theoretical framework was developed with recommendations for possible changes in the governance of the Amazon Fund and, from this, a theory called Steps of Environmental Public Governance was created, to guide this and other public funds, involving four steps or gradations: normative, management, representativeness and environmental, with the purpose of strengthening the Fund.

Keywords: Governance. REDD+. Logging. Amazon. Amazon Fund.

manter íntegro em sua gestão ao longo dos governos. Com as respostas às proposições, foi elaborado um framework teórico com as recomendações de possíveis alterações na governança do Fundo Amazônia e, a partir dele, foi criada uma teoria denominada Degraus da Governança Pública Ambiental, para orientar este e outros fundos públicos, envolvendo quatro degraus ou gradações: normativa, de gestão, de representatividade e ambiental, com a finalidade de fortalecimento do Fundo.

Palavras-chave: Governança. REDD+. Desmatamento. Amazônia. Fundo Amazônia.

1 INTRODUCTION

The Amazon Fund was a public fund created in 2007 as a REDD+ mechanism in Brazil, proposed at COP-13 (Amazon Fund, 2019), which operated for twelve years, until June 28, 2019, when its Steering Committee and Committee were extinguished. Technical by the Federal Government, paralyzing the possibility of new fundraising and the Fund's own activities in new projects.

The research consists of discovering what weaknesses exist in the governance mechanisms in the application of international resources raised for actions to combat deforestation in the Amazon Forest, which cause the adopted governance model to be influenced according to possible changes in government and what could be done to reduce these instabilities.

There is a need to analyze which characteristics of the governance model could prevent instability in the Fund in the face of changes in government and what to do to minimize the subjection of the Amazon Fund's governance to such changes.

The problem, therefore, is to identify whether a more robust governance model that is immune to changes in government is possible.

This work proves to be socially relevant, above all, because society/community is the main recipient of the right to environmental preservation, and due to the fact that Brazil is the world's largest recipient of resources for Reducing Emissions from Deforestation and Forest Degradation (REDD+), and the Amazon Fund has already received more than three billion reais to invest in projects to combat and reduce deforestation in the Amazon.

Therefore, the research seeks to verify whether there is adequate structuring in the governance mechanisms currently involved in the application of resources obtained through the Amazon Fund, as well as to indicate what type of governance is necessary to prevent this governance from being subject to changes in government, resulting in, therefore, immune to such fluctuations.

2 LITERATURE REVIEW

2.1 REDD+, its origin and conceptuality

Deforestation and forest degradation are activities that emit greenhouse gases (hereinafter referred to with the acronym GHG), mainly carbon dioxide (CO₂), which cause climate change and once they occur, ecosystem services are harmed and, in most cases, lost, as are the other services provided by the forest, with a huge amount of greenhouse gases being thrown into the atmosphere (MMA, 2017).

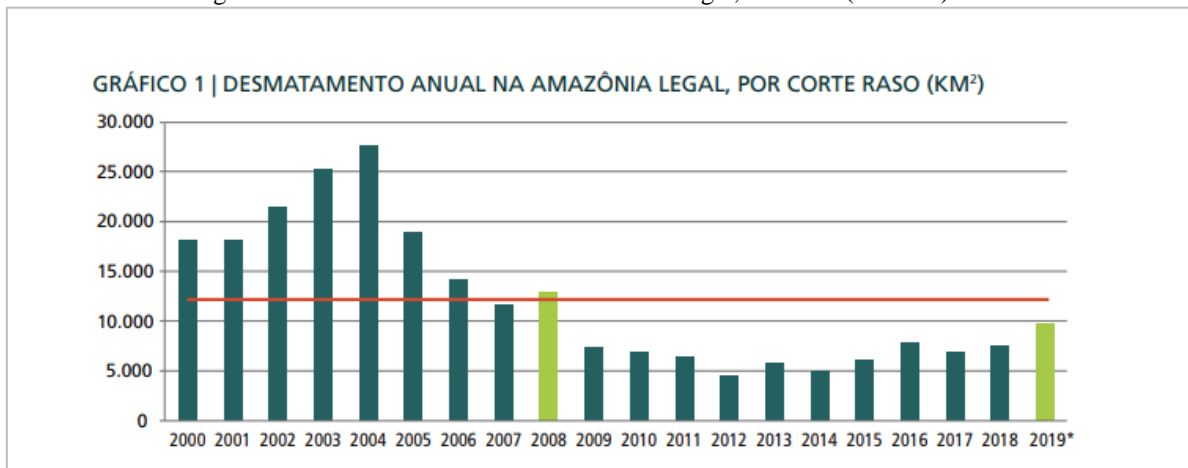
The curve of Brazil's CO₂ emissions, according to data from the Analytical Document - SEEG 9 (1990-2020) is identical to that before the adoption of the National Policy on Climate Change, eleven years ago, when Brazil was ranked sixth in the emissions ranking (SEEG, 2021; Marcovitch, 2011).

Brazil participates in the United Nations Framework Convention on Climate Change (UNFCCC), the Kyoto Protocol and the Paris Agreement, in addition to other international instruments (MMA, 2019a).

And yet, in our country, it is known that deforestation occurs both through fires in the Amazon, with the transformation of previously forested space into pasture for cattle, and through the occupation of the Atlantic Forest and the removal of its wood (Helene, 2009).

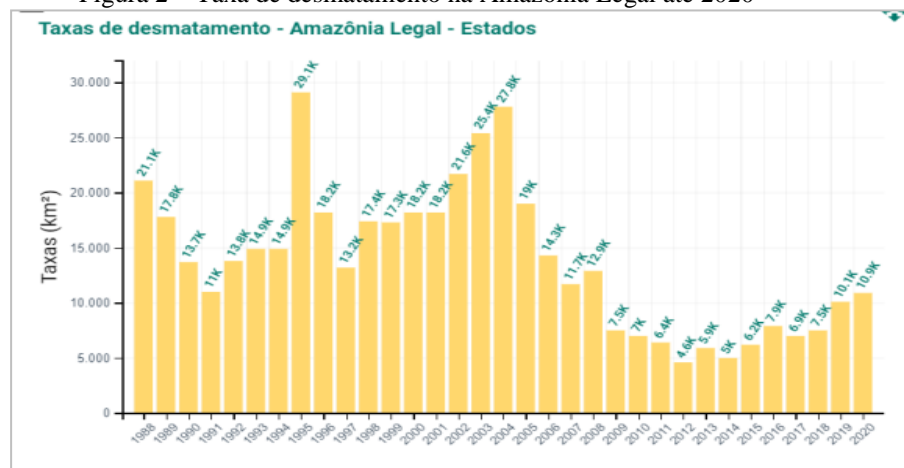
Thus, in addition to contributing to the greenhouse effect, deforestation generates other negative impacts on society and the environment and, in this context, on the other hand, the conservation and recovery of forests bring benefits for the mitigation and adaptation to climate change, in the face of its adverse effects.

Figures 1 and 2, below, demonstrate the evolution of annual deforestation in the Legal Amazon, until 2020, and the Deforestation Rate by State until 2020, information collected on the Amazon Fund and INPE websites.

Figura 1. Desmatamento anual na Amazônia Legal, até 2020 (em Km²)

Fonte: Relatório Anual de Atividades de 2020 (FA, 2021).

Figura 2 – Taxa de desmatamento na Amazônia Legal até 2020



Fonte: INPE/Prodes (2021).

Environmental issues regarding climate change, with regard to the increase in the concentration of greenhouse gases in the atmosphere, have been discussed internationally for more than twenty years, being a latent concern in all countries, and the increasing increase in Deforestation was increased by the systematic dismantling of environmental policies in Brazil, and by the federal government's rhetoric of misinformation and incompatibility of the economic development of the Amazon region with environmental preservation (Marcovitch and Pinsky, 2014; MMA, 2016).

In 1972, in Stockholm, the first major United Nations meeting took place, in which environmental issues were discussed, which were beginning to gain prominence, mainly among industrialized countries, through the perception that natural resources were finite (Nascimento, 2012).

Subsequently, in 1997, the Kyoto Conference was held, which resulted in a

protocol of intentions to reduce GHG emissions, although the mechanisms envisaged were limited in terms of the objective of reducing the emission of these gases, as they adopted the logic of the GHG market. transfer of emissions (Irawan & Tacconi, 2013).

The first time that there was talk about the possibility of financially compensating developing countries for actions that voluntarily reduced deforestation in their tropical forests and thus avoided GHG emissions occurred during the 9th United Nations Conference of the Parties (COP) on Climate Change carried out in Milan, in 2003, and these possible actions were called Compensated Reduction in Deforestation.

In 2006, the concept of RED was expanded, moving to REDD (Reducing Emissions from Deforestation and Forest Degradation), at COP 12 in Nairobi, so that promoting the reduction of forest degradation was environmentally necessary.

Essentially, REDD+ establishes incentives for developing countries to protect and better manage their forest resources by creating and recognizing a financial value for the additional carbon stored in trees or not emitted into the atmosphere and this proposal is based on the content of the Copenhagen, and currently treated under the United Nations Framework Convention on Climate Change (UNFCCC), REDD+ has proven, since its creation, to be one of the main pillars of the post-2012 international climate regime, especially in relation to climate mitigation efforts. developing countries (Corbera & Schroeder, 2010).

In summary, REDD+ is an instrument developed within the scope of the UNFCCC to financially reward developing countries for their results related to activities: (i) reducing emissions from deforestation; (ii) reduction of emissions from forest degradation; (iii) conservation of forest carbon stocks; (iv) sustainable forest management; and (v) increase in forest carbon stocks (Angelsen et al., 2018).

In November 2013, COP-19 was held in Warsaw, and the Warsaw Platform for REDD+ was approved, which established rules to determine reference levels for financing, for the implementation of safeguards and for the creation of institutions and modalities for Measurement, Reporting and Verification (MRV) (United Nations, 2013).

Therefore, REDD+ supports “reducing emissions from deforestation and forest degradation, and the role of conservation, sustainable forest management and increasing forest carbon stocks in developing countries” (UNFCCC, 2014, p. 6).

During COP-21, held in Paris, signatory countries will present quantitative and unilateral targets for reducing GHG emissions by mid-2025 or 2030, called National

Determining Contribution (NDC).

During the month of November 2021, COP-26 took place in the city of Glasgow, Scotland and the Glasgow Climate Pact was approved on November 13, 2021, despite differences between the so-called rich and poor countries, with some consensuses were reached (Capital Reset, 2021).

Finally, after two weeks of discussions, there was consensus on the format that the global carbon market should take, which was defined in Article 6 of the Paris Agreement, at COP-21, in 2015.

Coincidentally, deforestation in the Amazon forest in the Legal Amazon increased in October compared to a year ago, according to satellite data presented by INPE on November 12, 2021, in the Deter System.

Preliminary data from the National Space Research Agency (INPE) showed that approximately 877 square kilometers (339 square miles) of forest were deforested in October 2021 (DETER – INPE, 2021), an increase of 5% compared to October of 2020, having been the worst deforestation in the month of October since the current monitoring system began in 2016 (Reuters, 2021).

2.2 Amazon fund

As deforestation has been a present problem in recent years, as well as the degradation of the environment through human action, the Brazilian Government's initiative program, called the Amazon Fund, during its operation, was considered one of the main programs for the conservation of Amazon.

The Amazon Fund can be considered a pioneering initiative for financing REDD+ actions. The proposal to create the Fund was made by Brazil in 2007, during the 13th UNFCCC (Amazon Fund, 2019).

The following year, the international treaty was ratified in the domestic legal system and the Amazon Fund was authorized to be created and managed by BNDES, through Presidential Decree No. 6,527, of August 1, 2008.

Until June 2019, the Amazon Fund was an important intermediation interface in fundraising, having been created by Brazil in 2008, at the same time that the National Policy on Climate Change (PNMC) was published. At that time, it was considered the Government's main initiative aimed at reducing greenhouse gas emissions.

Until June 2019, when it was suspended, the person who held the presidency of the Amazon Fund was the Minister of the Environment and its management was carried out by BNDES. Through this bank, resources were raised, and projects and actions that received support from the resources transferred were contracted and monitored.

In terms of governance, until then, the Amazon Fund had a steering committee, formally called the Amazon Fund Guidance Committee (COFA), which had the function of determining the Fund's guidelines and monitoring the results obtained, formed by representatives of the federal government, and state, in addition to civil society. There was also the Technical Committee (CTFA), which had the function of certifying emissions from deforestation in the Amazon. This committee is appointed by the Ministry of the Environment.

Thus, the Amazon Fund presented itself as an important Brazilian initiative to support the reduction of greenhouse gas emissions, as a result of changes that may have occurred in the use of land and forests, representing a pioneering REDD+ instrument in Brazil, a true innovation in terms of environmental policy to protect forests and reduce deforestation in the Amazon.

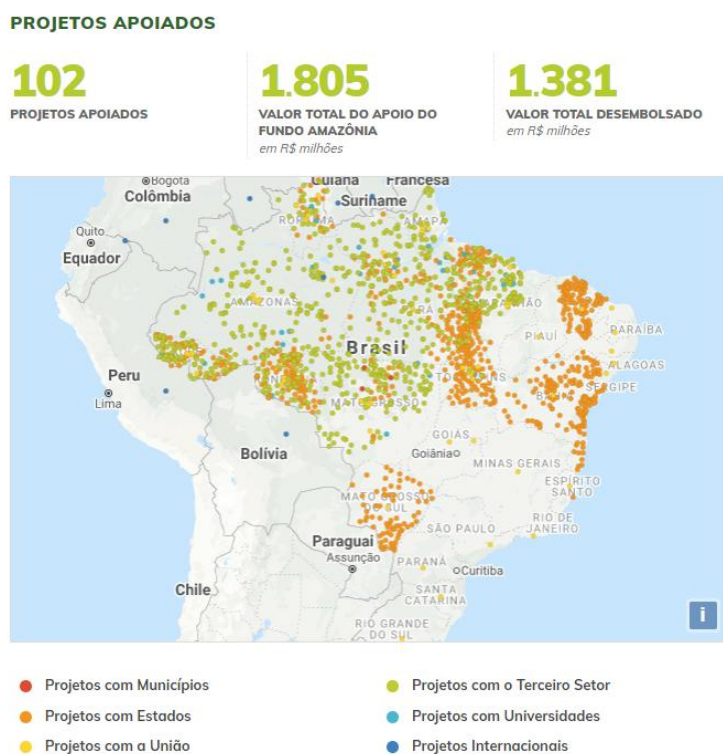
The Amazon Fund has already received more than three billion reais in donations from Brazil and other countries, with Norway being the main donor. By the end of 2017, the Amazon Fund received the amount of R\$3,123,091,258.23 in donations, 93.3% of which came from the government of Norway, 6.2% from the government of Germany, through KFW Entwicklungsbank, and 0.5% of Petróleo Brasileiro S.A. (Petrobras). (FA, 2018).

A country that stood out in terms of donations made was Norway, which was responsible for a REDD transaction at a national level, in addition to contributing money to the Amazon Fund.

According to data obtained from the institution's website, until June 2019, 102 projects supported by the Fund were approved, with a total value of financial support from the Amazon Fund in the order of R\$ 1,869,000.00 (one billion, eight hundred and sixty-six million reais), with a total of 1,066,000.00 (one billion and sixty-six million reais) disbursed to date (FA, 2019).

The following figure demonstrates this data:

Figura 3 – Projetos Apoiados pelo Fundo Amazônia



Fonte: Relatório Anual de Atividades de 2020 (FA, 2020).

From 2019 onwards, a new political stage began, as new federal and state governments were elected. With the new government, significant changes occurred in all government spheres, in which reforms were implemented with the restructuring of strategies and policies, also including environmental policy. In this way, the Amazon Fund, which represented an instrument of national climate policy and PPCDAm, ended up being achieved by this agenda, in which different priorities were indicated with the aim of adapting all available instruments to the country's new moment (FA, 2019).

With the promulgation of Decree 9,759, on April 11, 2019, which extinguished and established rules for federal public administration collegiate bodies, the two committees that made up the governance of the Amazon Fund, that is, the Amazon Fund Guidance Committee (COFA) and the Amazon Fund Technical Committee (CTFA), were extinguished as of June 28, 2019.

And Decree 10,223, of February 5, 2020, revoked several normative decrees or parts of them, and in article 1, item CCII, articles 4 to 6 of Decree 6,527/2008 were revoked, which were related and established the composition and presidency of COFA and its objectives.

With the publication of Decree 10,144/2019, of November 28, 2019, which Establishes the National Commission for Reducing Greenhouse Gas Emissions from Deforestation and Forest Degradation, Conservation of Forest Carbon Stocks, Sustainable Management of Forests and Increase in Forest Carbon Stocks - REDD+, completely repealing, in its article 12, item I, the previous decree that established CONAREDD+, Decree 8,576, of November 26, 2015.

By Decree 10,144/2019, there were also changes in the collection of donations to the Amazon Fund, as in article 12, item II, of the aforementioned decree, article 2 of Decree 6,527/2008 was revoked, which authorized “the BNDES to carry out the fundraising and issuing a diploma recognizing the contribution of donors to the Amazon Fund” and, thus, the BNDES was no longer authorized to capture new donations to the Amazon Fund at the end of 2019 and, also, article 3, which established the responsibilities of the CTFA.

As a result, COFA and CTFA were dissolved and all analyzes and approvals of new projects by BNDES were suspended and, until the end of this research, these negotiations had not yet been concluded.

Based on these changes in relation to the governance of the fund, the Brazilian government began negotiations with the governments of donor countries to seek to establish an understanding regarding a new governance that included all the points of view of the parties involved.

Despite these characteristics and the legal framework of the Fund, with the promulgation of Decree 9,759, on April 11, 2019, which extinguished and established rules for federal public administration bodies created by decree, the two committees that made up the governance of the Amazon Fund, namely: the Amazon Fund Guidance Committee (COFA) and the Amazon Fund Technical Committee (CTFA), were extinguished as of June 28, 2019 (FA, 2019).

On June 5, 2020, Initial Petition number 40,734 was filed, referring to the Direct Action of Unconstitutionality by Omission (ADO) number 59. The action was filed by the Brazilian Socialist Party (PSL) and the Socialism and Freedom Party (P-Sol), motivated by the suspension of Amazon Fund operations.

On October 1, 2020, the Rapporteur of the case, Minister Rosa Weber, in a monocratic order, called a Public Hearing, with the purpose of collecting information to assist the Court in judging the action, and said hearing took place on October 22 and 23

2020, in which testimonies were collected from thirty-four people who had knowledge at some level about the structure and functioning of the Amazon Fund, and the trial took place on 11/10/2022 and became final, without the possibility of appeals, on 23 /08/2023. On the merits of the judgment, by a majority, the action was partially judged to be valid, and the art was declared unconstitutional. 12, II, of Decree No. 10,144/2019 and art. 1st of Decree No. 9,759/2019, with regard to the collegiate bodies established by Decree No. 6,527/2008; The judgment failed to accept, due to supervening loss of purpose, due to being prejudiced, the request for declaration of unconstitutionality of art. 1st, CCII, of Decree No. 10,223/2020, at the point where it extinguished the Amazon Fund Guidance Committee, since the Federal Supreme Court itself, in the judgment of ADPF 651, reported by Minister Carmen Lúcia, when granting the addition to initial decision, declared the unconstitutionality of this legal provision. The decision, finally, determined that the Union, within sixty days, adopt administrative measures necessary for the reactivation of the Amazon Fund, within the limits of its competences, with the governance format established in Decree No. 6,527/2008.

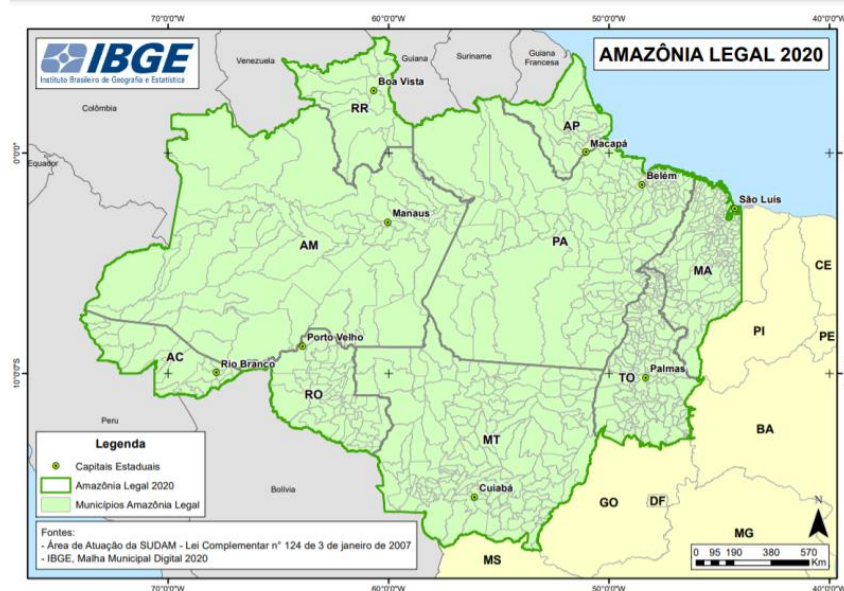
It appears, Bill PLS 415/2020, initiated in the federal Senate, with the purpose of transforming the Amazon Fund into a private fund created by law. The project is an initiative of Senator Jorge Kajuru (Cidadania/GO), its Rapporteur is Senator Jayme Campos (DEM-MT), and is categorized under the subject of Environment, with the nature of a General Standard (SF, 2021), which has already was approved in the Senate, on November 24, 2021, with a deadline for appeal between 11/29/2021 and 12/03/2021, which occurred at the 36th Meeting, when the Senate Environment Committee approved PLS 415 /2020, in accordance with the report by Senator Jayme Campos, with the Minutes and Notes, the Final Opinion of the Commission and the Final Text of the Commission and Letter no. 187/2021- CMA, which announced the approval of a final decision. There was no appeal, and the matter was referred to the Chamber of Deputies on 12/10/2021, as it is a law that requires bicameral approval (National Congress, 2021).

Received, on 02/02/2022, the Board of Directors of the Chamber of Deputies forwarded the project to the Committees on National Integration, Regional and Amazon Development, Environment and Sustainable Development and Finance and Taxation and Constitution and Justice and Citizenship , with PL 4387/2019 being attached to it, a proposal subject to Conclusive Assessment by the Committees. The bill was processed during 2022 and on 03/10/2023, the project was redistributed to the Commission for the

Amazon and Original and Traditional Peoples, replacing the Commission for National Integration, Regional Development and the Amazon. PL-1183/2023, on 04/26/2023 and PL-584/2024, on 03/12/2024, were added to the project. On 05/06/2024, Deputy Amom Mandel (CITIZENSHIP-AM) was appointed Rapporteur and on 05/07/2024 the deadline for Amendments to the Project began (5 sessions from 05/08/2024), which ended on 05/22/2024 without presenting amendments, and the project continues to be processed in the Chamber of Deputies.

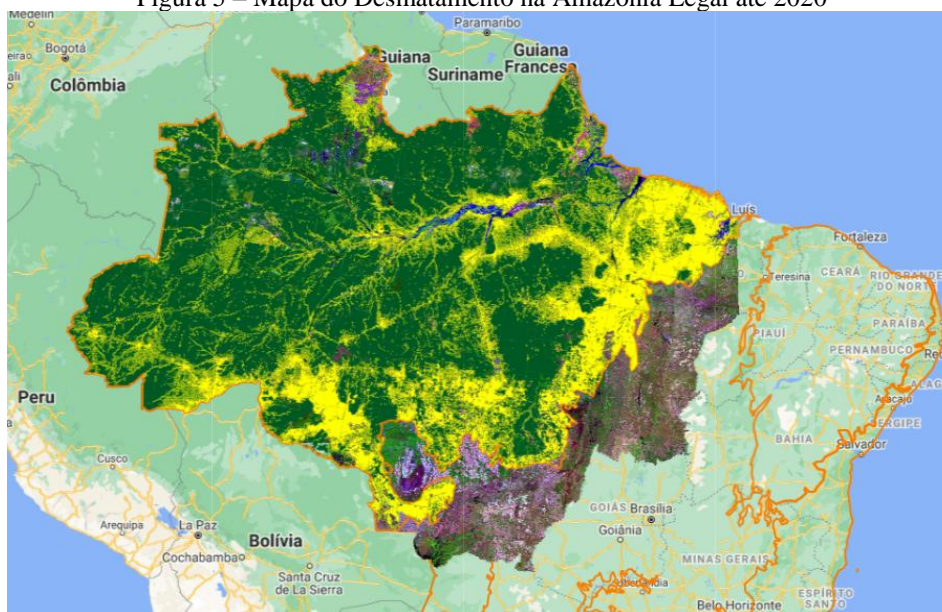
The IBGE (2021) released, on July 13, 2021, the new Map of the Legal Amazon for 2020 (Figure 4) and, according to the information, currently, the Legal Amazon occupies 5,015,068.18 km², corresponding to approximately of 58.9% of the Brazilian territory (8,510,295.914 km²), and is made up of nine states, which are Acre (22 municipalities), Amapá (16), Amazonas (62), Mato Grosso (141), Pará (144), Rondônia (52), Roraima (15), Tocantins (139) and part of Maranhão (181 municipalities, of which 21 were partially integrated), with a total of 772 municipalities. And figure 5 represents the accumulated deforestation in the Legal Amazon from 1988 to 2020, in more recent research with INPE, the accumulated deforestation until 2020, and the image shows the increase in deforestation in the Legal Amazon in the period.

Figura 4- Mapa da Amazônia Legal para 2020



Fonte: IBGE (2021).

Figura 5 – Mapa do Desmatamento na Amazônia Legal até 2020



Fonte: INPE, Terrabrasilis, Prodes (2020).

2.3 Theory in governance

Governance can be conceptualized as the exercise of political, economic and administrative authority in managing the affairs of a country, at all levels, which includes the mechanisms, processes and institutions through which citizens and groups articulate their interests, exercise their legal rights, fulfill their obligations and resolve their conflicts.

According to Vidigal (2000), governance comes from a Latin origin “governance” which means to govern, it is a form/system used by shareholders for the company's initiatives.

The expression “governance” arises from considerations carried out mainly by the World Bank, “with a view to deepening knowledge of the conditions that guarantee an efficient State” (Diniz, 1995, p. 400). This scholar also states that “such concern shifted the focus of attention from the strictly economic implications of state action to a more comprehensive vision, involving the social and political dimensions of public management”.

Therefore, the assessment of governing capacity would then be carried out through the configuration through which the government exercises its power, not just focusing on the results of its policies.

According to The World Bank's 2017 report, developing countries and international development entities must rethink how they view governance as the key to overcoming challenges related to security, growth and equity.

Governance can be defined as the way in which power is exercised in the administration of economic and social resources, with a view to development. In the definition of the World Bank, in the Governance and Development Report, from 1992, governance is the exercise of authority, control, government power, and can also be represented as the way in which power is exercised in the administration of social resources and economic aspects of a country, with a view to development, which implies the ability of governments to plan, formulate and implement policies, in addition to fulfilling their functions.

The 2017 World Bank Report, in chapter 1, which has the title, Governance for development, the challenges, defines governance as follows:

Governance is the process by which state and non-state actors interact to design and implement policies within a given set of formal and informal rules that shape and are shaped by power. This Report defines power as the ability of groups and individuals to bring about the interests of those groups and to cause others to act in the interests of those groups and individuals and to bring about specific results. Depending on the context, actors may establish a government as a set of formal state institutions (organizations and rules) that impose and implement policies. Furthermore, depending on the context, state actors will play a more or less important role in relation to non-state actors, such as civil society organizations and business lobbies. Furthermore, governance occurs at different levels, from international bodies, to national state institutions, to government agencies, to community and business associations. These dimensions often overlap, creating a network of actors and interests. (2017, p. 2).

The World Bank itself then clarified that this general definition is consistent with the World Bank's corporate definition, which emphasizes formal institutions and the role of state actors. In this sense, in terms of environmental governance, Marcovitch and Pinsky clarify that the evolution of Brazilian environmental policy developed as a reflection of the evolution of policies in the international context:

In this way, the evolution of Brazilian environmental policy is a reflection of the evolution of public policies in the international context, the adoption of the principles of decentralization, privatization, social participation and the institutionalization of integrated and dynamic management processes. Such changes occur mainly from the perception of the failure of current development models and their negative influences on society, the economy and the environment, resulting in transformations of policy paradigms and public,

social and private institutions and their interactions. -relations in the use of environmental resources, in the appropriation of territories and in the management models adopted. (2014, p. 283)

This model of environmental governance, World Resources Institute (WRI, 2009) mentions that it is associated with public institutions, such as government environmental agencies, observing the position of the official authority regarding the environment, comprising, at the national level, the ministries, environmental agencies and regulatory and control agencies at all levels of government.

2.4 Governance theory as a structure for the action of the Amazon Fund

As already mentioned, the Amazon Fund is a fund managed by BNDES, which also performs the function of raising resources, contracting and monitoring the financed projects. It is worth remembering that, although new projects are suspended, projects that were already under development continue to be implemented, so the bank continues its work in these cases.

Figure 6, below, precisely portrays the Governance of the FA before Decree No. 9,759, of April 11, 2019, let's see:

Figura 6 - Governança do Fundo Amazônia até 28 de junho de 2019



Fonte: Relatório de Atividades exercício 2020 (FA, 2021).

This FA governance structure was made up of representatives from the Federal Government, the governments of the states of the Legal Amazon, civil society and the

scientific community. However, Decree 10,144/2019, of November 28, 2019, in its article 12, revoked article 2 of Decree 6,527/2008, which authorized the BNDES to collect donations and issue a diploma recognizing the contribution of donors to the Amazon Fund.

Therefore, it appears that the governance model adopted by the Amazon Fund obtained large investments for the Amazon, providing transparency to its activities through the preparation of Annual Reports that expose actions and results obtained through the FA, in addition to always organizing and participating of events with the aim of publicizing the work carried out, reporting to donors and society on what is being accomplished.

3 METHODOLOGY

Regarding the methodological procedure used, these will be detailed below, with the collection techniques used, the sample selection criteria used for the interviews, the field research, the research subjects, conceptual model and research tie-in matrix , as well as preparing the interviews, defining the research methodology.

The case study addresses the role of the Amazon Fund, as a public fund created to finance projects to reduce deforestation and degradation of the Amazon Forest.

Data collection was based on semi-structured interviews with four open questions answered in interviews with people involved at various organizational levels that involve the transfer of REDD+ resources through the Amazon Fund.

Thus, when interviews were carried out, the analysis of the collected data was carried out using the deductive method and the data were analyzed from the interviews, which were transcribed and their contents were treated using Bardin's Content Analysis technique (2016), a technique that presupposes three moments: pre-analysis, exploration of the material and interpretation of the contents. It is defined as a set of communications analysis techniques aiming to obtain, through systematic and objective procedures for describing the content of messages, indicators that allow the inference of relative knowledge of the conditions of production and reception of these messages (Bardin, 2016).

Thus, all categories of the methodological procedure adopted were established, and the following table demonstrates each of them.

Quadro 1 - Caracterização do Estudo em Questão

Características Gerais de Pesquisa Científica		Caracterização do Estudo
Quanto à abordagem do problema	Pesquisa qualitativa, pesquisa quantitativa e pesquisa mista. (Gerhardt & Silveria, 2009; Triviños, 1987; Minayo, 2007; André, 1995)	Pesquisa Qualitativa
Quanto ao Gênero	Pesquisa teórica, metodológica, empírica e prática. (Prodanov & Freitas, 2013)	Pesquisa Metodológica
Quanto à natureza	Pesquisa básica e pesquisa aplicada. (Gerhardt & Silveira, 2009; Gil, 2008; Heerd & Leonel, 2006)	Pesquisa Aplicada
Quanto aos procedimentos empregados	Pesquisa experimental, bibliográfica, documental, de campo, ex post facto, de levantamento, com survey, estudo de caso tipo único e tipo múltiplo, pesquisa participante, pesquisa etnográfica e etnometodológica. (Voss, Tsiriktsis, & Frohlich, 2002; Yin, 2015; Lakatos & Marconi, 1996)	Pesquisa Bibliográfica e Estudo de Caso Tipo Único
Quanto aos objetivos	Exploratória, descritiva e explicativa. (Gerhardt & Silveira, 2009; Mattar, 1999; May, 2004)	Pesquisa Exploratória e descritiva

Nota: elaborada pela autora com base nos autores mencionados.

Preliminarily, a list of possible participants was created, including representatives of the main countries and companies that made donations to the Amazon Fund, that is, Norway, Germany and Petrobrás, as well as experts and public policy makers at national level, or that is, people involved in the national REDD+ policy, with the aim of obtaining a qualitative assessment of people with in-depth knowledge and who are involved in the process of formulating and implementing REDD+ policies, specifically linked to the Amazon Fund and who have been involved with the FA between 2008 and 2019. This delimitation of the procedure for choosing the interviewed subjects was important to clarify the step by step, with the aim of maintaining scientific rigor in qualitative research and establishing transparency regarding the decisions made (Flick, 2009).

After completing the initial interviews, other participants emerged and were included based on indications from the first interviewees, in the method through which references are made between people who share or know other people who have some characteristics of interest for the research. Thus, the research was carried out with 16 people, over 18 years old, with authorization through a Free and Informed Consent Form, and the profile of the interviewees was varied, as it approached different stakeholders.

With regard to the basic interview script by interviewee profile, four semi-structured questions were asked to the administrators of the Fund researched and agents of the government entities involved, donors and, equally, the interviews were applied to others involved, such as proponents and participants of projects benefiting from the resources.

To assist the researcher in analyzing the data collected in the interviews, after creating codes and categorizing the researcher, the software was chosen to be used to analyze the data (Godoi, Mello, & Silva, 2010). The program that proved to be most appropriate for managing and analyzing the information collected was ATLAS.ti 9. According to (Godoi, Mello, & Silva, 2010), the use of software to support the analysis of empirical material in qualitative research is increasing.

3.1 Interviewee data

The following table presents the data of the interviewees (names and positions), in order to identify that each interviewee is not fictitious.

Quadro 2 - Nomes, cargos/funções no FA, data, duração e plataformas utilizadas para as entrevistas

	Nome	Cargo	Órgão	Data	Duração	Meio
1	Virgílio Viana	Superintendente Geral	Fundação Amazonas Sustentável (FAS)	15/09/2020	27'41"	Presencial
2	Valcleia dos Santos Lima Solidade	Superintendente de Desenvolvimento Sustentável de Comunidades		30/09/2020	44'19"	Presencial
3	Victor Salviati	Gerente		15/10/2020	38'14"	Presencial
4	Henrique Pereira	Professor e Ex-Chefe IBAMA Mao	UFAM	10/08/2021	28'20"	Meet
5	Carlos Nobre	Membro COFA por MCTIC 2011-2014	INPE	19/08/2021 20/08/2021	25'51" 45'05"	Whatsapp
6	Suene Moraes	Assessora Imprensa	SEMAR/TO	20/08/2021	34'04"	Meet
7	Rubens Brito	Sub-secretário meio ambiente		23/08/2021	51'49"	Meet
8	Adalberto Val	Membro do COFA por SBPC	INPA	25/08/2021	73'04"	Meet
9	Naziano Filizola	Membro do CTFA 2012/2018	CTFA UFAM	31/08/2021	42'02"	Meet
10	Marcos Freitas		CTFA UFRJ	01/09/2021	44'08"	Whatsapp
11	Gabriel Lui	Coordenador	MMA	02/09/2021	38'23"	Meet
12	Juliana Santiago	Chefe do FA no BNDES	BNDES	06/09/2021	74'23"	Meet
13	André Vianna	Gerente de Projeto Cidades Florestais	IDESAM	09/09/2021	21'36"	Meet
14	Livia Kramer	Min Rel Exteriores Noruega	Noruega	10/09/2021	61'26"	Meet
15	Jacques Marcovitch	Professor Senior	FEA-USP	14/09/2021	36'35"	Meet
16	Priscilla Santos	Cons. Mudanças Climáticas Embaixada Noruega	Noruega e CEPAL	21/09/2021	34'25"	Meet

Fonte: relação dos entrevistados elaborada pela Autora, 2021.

4 ANALYSIS AND DISCUSSION OF RESULTS

In this chapter, the objective is to describe and discuss the results found from the analysis of the collected data. To this end, we discuss the relationship between the data obtained through the research interviews, based on the analytical categories found, in accordance with the theoretical framework explained. Afterwards, a graphic representation is demonstrated, using a framework that graphically organizes the possibilities of conduct and situations that could reflect on the reduction of weaknesses in the governance of the Amazon Fund, considering the results, with responses to the propositions presented (confirming or disconfirming), as well as, answering the research problem.

The data analysis phase was divided into cycles, the first cycle being coding, in which we sought to identify and record excerpts from the analyzed materials that exemplify the same idea (Gibbs, 2009).

Quadro 3 - Categorização e Codificação dos Dados Coletados

CODIFICAÇÃO E CATEGORIZAÇÃO COM BASE NA TEORIA DE GOVERNANÇA		
CÓDIGOS DESCRITIVOS	CATEGORIA	CÓDIGOS ANALÍTICOS
<ul style="list-style-type: none"> • Implementação do FA; • Concretização e estabilização do FA 	Pontos Fortes do FA	Criação do FA
<ul style="list-style-type: none"> • Participação paritária; • Doação com base em resultados. 		Conquistas do FA
<ul style="list-style-type: none"> • Mudança de paradigma na ideologia e política de governo; • Suspensão do FA 	Ameaças que causam impacto ao FA	Início dos Problemas
<ul style="list-style-type: none"> • Falta de clareza na interlocução; • Criação por Decreto 	Pontos que exigem atenção no FA	Fragilidades na Governança do FA
<ul style="list-style-type: none"> • FA tendo base em política de Governo ou política de Estado; • Norma mais robusta para a existência do FA 	Oportunidades na reativação do FA	Sugestões para fortalecimento da Governança do FA na reativação

Fonte: elaborada pela Autora, 2021.

Therefore, the general results are presented based on the literal replication criterion for each category of analysis, which were divided into four categories, which are the strengths and points that require attention in the Amazon Fund, the threats that cause impacts and opportunities in reactivating the Amazon Fund, generating the five analytical codes.

4.1 Creation of the Amazon fund

To begin the presentation of the results, we start from the idea that the Amazon Fund, since its creation and implementation, began to present positive results as soon as operations and financing of approved projects began.

In this section, the results are presented with regard to what the interviewees responded in a convergent way to the theoretical framework in relation to the creation, installation and start of operation of the Amazon Fund's activities.

What was observed was that those interviewed who, in some way, had contact, knowledge or participated in the period of creation of the Amazon Fund spoke about it in a positive way.

With the creation and beginning of the FA's financial support activities, it began to have a well-designed governance structure, which was guided by the principles of good governance, with emphasis on transparency. In addition to the information contained on the Fund's official website, supported projects were often subject to audits that could be carried out by the Fund or even by donors.

This transparency was widely reported in the speeches of other interviewees. It is also possible to identify that the creation of the Amazon Fund represents a pioneering spirit in terms of international policy for implementing REDD+ actions.

Thus, according to the analysis of the documents that demonstrate the creation of the Amazon Fund, as well as the interviews carried out, it is concluded that the Fund was a pioneering REDD+ mechanism created by a proposal presented by Brazil at COP-13, and that it presented results extraordinary since the first years of its.

4.2 Achievements of the Amazon fund

In this section, the results are presented with regard to what was identified as the achievements of the Amazon Fund throughout its trajectory until suspension, considering transversally what is contained in the theoretical framework and the statements from the data collected in the interviews carried out.

As already explained, the Fund appears to be a pioneering REDD+ initiative and this, in addition to what was demonstrated in the literature review, was also mentioned by several interviewees, highlighting that many aspects and characteristics of the Fund

represent achievements throughout its existence, especially with regard to fundraising due to the reduction in deforestation in the Amazon, which was occurring on a large scale.

There was, therefore, a decline in deforestation from the first years of creation of the Amazon Fund until 2018, which denotes its effectiveness as a mechanism to combat deforestation, a great achievement that was celebrated throughout the years of operation.

All interviewees mention Brazil's prestige in the international sphere at the time of the creation of the Amazon Fund and how the results of the Fund's operation were positive until the time of its dissolution.

A great achievement of the Amazon Fund was due to the fact that the donor countries agreed to the formation of a model in which there was no interference or interference in national sovereignty and Brazil could manage the donations received in the way that best suited it, as long as the expected result was obtained, which was a reduction in deforestation.

Other achievements of the Amazon Fund can be observed, including the effectiveness that the fund had in supporting projects to combat deforestation and fires.

For several interviewees, the relationship they had with the Amazon Fund was positive, mainly due to the likely completion of the Projects that were supported by the Fund in the State of Tocantins and the technical performance of FA technicians in analyzing the execution of these projects. Likewise, when talking about the Amazon Fund's achievements, one of them was the confidence in the results presented by INPE in relation to deforestation data and its reduction.

In short, after analyzing all the interviews, it was possible to identify numerous achievements of the Amazon Fund, among which it is possible to list an open dialogue between BNDES technicians and project executors, impacts and contributions of the FA in Conservation Units, assistance in advancing INPE's monitoring conditions, effectiveness in reducing deforestation between 2008 and 2014, security and reliability in deforestation data measured by INPE.

Thus, the information collected in the interviews is in line with the literature presented and the data collected in the documents made available by the Amazon Fund and data on the reduction of deforestation, it appears that there were many achievements obtained by the Fund since its creation until its suspension, and this was diametrically reflected in obtaining the expected results, with a large increase in the reduction of deforestation from 2008 to 2018.

4.3 Beginning of problems involving the Amazon fund

In this section, we present the results regarding the beginning of the problems with the Amazon Fund, which occurred as a result of the change in government ideology. It is possible that this could have been one of the main reasons for the dissolution of the Fund's guiding and technical committees and that will require attention in governance when the FA is reactivated.

At a press conference in May 2019, the then Minister of the Environment, Ricardo Salles, stated that he had carried out an analysis of some project contracts financed by the Amazon Fund and that he had found inconsistencies. The projects that would have presented inconsistencies were not pointed out, but this fact started a feeling of uneasiness among the institutions and a series of disagreements that started to cause problems with regard to criticism of the Amazon Fund and its governance, including unofficial speeches that the Fund's resources would be used to pay salaries in non-governmental organizations. These problems reflected the federal government's stance on the environmental issue, which culminated in the suspension of the Amazon Fund due to the extinction of its guiding and technical committees, a fact that took everyone by surprise, as it was something truly unexpected.

These situations are corroborated by the statements of the interviewees and what is observed is that there is a convergence in the statements of the interviewees in the sense that the projects supported by the Amazon Fund presented by non-governmental organizations, although there were a greater number in the portfolio of supported projects, in amount of resources the largest projects were those presented by government organizations.

Therefore, it was evident, from the documents and news researched, in addition to what was extracted from the interviewees' responses, that the problems that began to destabilize the functioning of the Amazon Fund began after the change in thinking of the new federal government.

4.4 Weaknesses in the governance of the Amazon fund

In this section, the weaknesses of the Amazon Fund's governance will be analyzed in line with the theoretical framework presented, analyzing together with the Fund's

trajectory until the moment it was dissolved, and to what extent such weaknesses were decisive for it not to be could prevent the Fund from being shut down.

The first weakness perhaps concerns the legal diploma that created the Amazon Fund and its Guidance and Technical Committees, that is, a decree, and the ease with which it is revoked in the way it happened.

Although the decree is the correct legal diploma for the stages of incorporation of an international treaty, through a complex legislative procedure, as provided for in the Constitution of the Republic of 1988, its repeal can occur in a more simplified manner, which should not be occur.

On a practical level, the incorporation of the commitments that Brazil assumed at COP-13, with the approval of the Amazon Fund, occurred by Decree, and remained so throughout its existence, without seeking to change the norm to another that is more robust and more difficult to change, such as a law, for example. But this was not done because there is a general consensus that it was expected that Brazil would always fulfill the commitment set out in the international treaty, based on the assumption that a State must guarantee compliance with commitments ratified at the international level.

Interviewees also reported the tone of surprise that fell on everyone, a situation that, at the same time as it represented the beginning of problems with the Amazon Fund, is also characterized as one of the weaknesses in its governance.

These findings highlighted the existence of weaknesses in the governance of the Amazon Fund that may have influenced the situations that resulted in the suspension of the Fund.

4.5 Suggestions for strengthening the Amazon fund

In this section, the results are presented regarding opportunities to strengthen governance when the Amazon Fund is reactivated.

It was clear from the research that several of the interviewees suggested, as a means of strengthening and shielding the governance of the Amazon Fund in the event of its reactivation, the alteration of the legal diploma that created it, which was a decree, to a more robust one, which is more difficult to change, as is the law. This was the recommendation made by several interviewees.

Some interviewees made this suggestion of transforming the creation and governance of the Amazon Fund into law, because they believe that this would be a way to make it more difficult to dissolve its composition elements and to stop the FA itself, since the law is a more difficult diploma. To be changed, as it has stricter rules for editing and revocation.

Regarding the suggestion that the Amazon Fund be created under the law, as previously shown in this research, there is already a bill with this purpose, PLS 415/20, initiated by Senator Kajuru, whose explanation of reasons project and processing is explained in the chapter and subtitle of this thesis. However, the project establishes that the fund must be established in legislation as a non-profit civil association to allocate the value of donations received in cash to carry out actions to prevent, monitor and combat deforestation in the Legal Amazon.

One of the interviewees pointed out some suggestions in this regard, the existence of committees with irremovable mandates, to strengthen the governance of the Amazon Fund, suggesting that, in addition to the reformulation of the Amazon Fund committees being composed of people from multidisciplinary areas to fulfill an irremovable mandate without coinciding with the official election year for the majority positions, this determination could represent something good for strengthening the governance of the FA and, also, the preparation of white papers to guide these committees in solving problems, not only environmental ones, but also even political issues involving the Fund.

Another interviewee made a similar recommendation, however, he suggested that, given the importance of the Amazon Fund, a mechanism similar to a regulatory agency could be created. There was also a recommendation to create councils, including a government council, a council of non-governmental agencies and a council of donor partners, such as the European ECA30 Project, in addition to maintaining a parity governance structure for the Amazon Fund.

The interviewees mentioned the feasibility of the participation of donor countries in the deliberative councils of the Amazon Fund, without this being an affront to national sovereignty, since these countries are the Fund's financiers, having already made large amounts of transfers and, furthermore, , that, if the Fund is reactivated, the rules for approving projects must be designed and developed taking into account the reality of the Amazon and the BNDES must use different rules than those used for approving projects and financial contracts with the initiative private.

Some interviewees also mentioned the possibility that the management of the Amazon Fund would be carried out by a private legal institution, which should be established by law. However, at this point there were differences of opinion between them, as some understand that privatization would not be possible since the International Treaty that created the Amazon Fund has, in its origins, the requirement that it be a public fund, subject to change. in the Brazilian domestic legal system.

Some of those interviewed had a contrary opinion, with the mention that Norway's interest, through Norway's International Climate and Forest Initiative (NICFI), which is the environmental body equivalent to a Ministry of the Environment, was cooperation between the two countries in a public partnership, because this was the nature of the cooperation signed, arguing that with the private sector alone it would be difficult to achieve the objectives and results.

Asked if privatization could be a path, some responded that it would not be within the focus of the NICFI partnership, because public policy is needed, the country's will to implement public policies that lead to a reduction in deforestation, and that is the private sector alone. can't do.

The interviewees converged on the recommendation that the Amazon Fund, upon resuming its activities, should open an office in the Amazon, as in the existing format, with the office operating at the BNDES headquarters, in Rio de Janeiro, it is far from the Fund's purpose, which is deforestation in the Legal Amazon, which is difficult to understand and execute.

Amazon Fund as State Policy and not Government Policy, was also suggested by several interviewees, although some interviewees analyzed, from their point of view, that the Amazon Fund represents a Government policy, while others see the Fund as a true policy of State.

Some interviewees went further and suggested that, based on a State Policy, a cooperation treaty be created between Amazonian countries, because the Forest, with its fauna and flora, does not see the political borders defined in the so-called Legal Amazon and extends across several countries in the Amazon Basin.

Due to the interviewees' experience and knowledge about the Amazon Fund, many important recommendations were thought up and made by all participants, which converge with an idea for possible strengthening of the Amazon Fund's governance.

Once the analysis and discussion of all collected data, both documentary and interviewees' responses, has been completed, it is possible to make considerations, presenting recommendations for changes that could contribute to strengthening the Amazon Fund, making it, if not immune, at least more stable in the face of possible changes in government, so that, when reactivated, it will not be suspended again.

Regarding the idea that considers that the Amazon Fund represents a Government Policy and not a State Policy, the research and data analysis confirmed this proposition, since the Amazon Fund was conceived as the result of true State Policy, not However, it is possible to distance ourselves from the ideals that underpinned that State Policy, according to the interests of a given government, in which a certain agenda of interests can be strengthened or weakened, as is the case with the environmental agenda.

Thus, in relation to the consideration that, as a Public Fund that originates from international cooperation, the Amazon Fund depends on the ideologies and intentions of the existing government at a given moment and throughout the management of the fund, the analysis and discussion brought to light the conclusion that this proposition is confirmed, because, although the State Policy gave rise to the Amazon Fund, it cannot be forgotten that the orientation of a National State is subject to change, according to the ideology of a given government, which can break with the understandings and conceptions of the State emanated at a previous time.

As for the idea that the Amazon Fund would have more stability if a normative means were found that would keep it intact, with strict rules for its alteration, suspension or exclusion, regardless of changes in government, the results of the analysis confirmed this statement, since the Amazon Fund, although it was created and internalized in the Brazilian legal system, through a decree, which is the applicable legal diploma for procedures arising from international agreements and treaties, could have undergone a process of legalization, that is, of transformation of its structure, which would come into existence through law, which is a type of normative diploma, with stricter rules for its formation and also for its dissolution, and can only be changed by the National Congress.

Thus, even if some elements of the Amazon Fund's governance structure could be regulated by decree or resolution, with the aim of not rigidifying its structure, the legal basis would not allow the FA to be changed abruptly.

This, therefore, is the first recommendation to strengthen the Amazon Fund, since the transformation of the legal document creating this Fund, which is a public fund,

created through decree, for implementation through law, as said before, could make it difficult sudden changes in paradigms and avoid, once again, the suspension of the fund's operation in accordance with the change in interests.

Therefore, the recommendation of this research would be consolidated in changing the normative basis of the Amazon Fund to law, as proposed in the project, however, the ideal would be to maintain the legal nature of a Public Foundation, with the management of the Fund's resources remaining under the responsibility from BNDES, a financial institution that, over the ten years of FA operation, learned on its own to make the rules that would guide project approval and release of resources more flexible.

This perception occurred because, unlike common BNDES operations, in which the amounts released for financing depend on strict rules and payment guarantees, precisely because they are financing with reimbursement, the resources of the Amazon Fund, in turn, are resources donated by nations and national or international companies in exchange for a result, which is the reduction of deforestation in the Amazon Forest, that is, it is money donated, not lent, and the consideration is the expected result to enable the release of more resources.

Regarding the reestablishment of the Amazon Fund Committees, both the Advisor and the Technical, the recommendation is that there be a reformulation in the FA's governance model in the sense that the committees are completely restructured with equal composition and that their members exercise a multi-annual mandate without that they can be dismissed without coincidence of temporality and that Councils representing government entities, non-governmental organizations and donor partners are created, which would function as advisory councils.

With these perceptions and recommendations made, and considering that the present study aimed to understand the context of the Amazon Fund, in the search for an answer to the research problem, based on the formulation of propositions, the results allowed me to respond to the problem question, with the creation of a scientific postulate in this thesis, which I called Steps of Environmental Public Governance, steps that must be taken to reach a level of strengthened governance for the Amazon Fund and, also, for other public environmental funds, implementing REDD+ and payment for results, through these four theoretical steps: normative, management, representativeness and environmental.

Table 4, below, represents the proposal of a theoretical framework with recommendations for possible changes with a view to strengthening the Amazon Fund, and which supported the four levels of gradation of public environmental governance:

Quadro 4 - Framework teórico sugestivo de alteração na governança

Gradação	Sugestões para mudanças
Normativa	- Criação por lei - Representar uma Política de Estado
Gestão	- Permanecer gerido pelo BNDES
	- Melhorar a comunicação e informação do FA ao público
	- Comitês eleitos, para mandatos por tempo determinado, com poder orientador, técnico e de regulação
Representatividade	- Composição paritária: instituições públicas, privadas e doadores
Ambiental	- Garantir a proteção do meio ambiente ecologicamente equilibrado para as presentes e futuras gerações

Fonte: elaborado pelos autores, 2021.

Therefore, the governance of the Amazon Fund, as well as other public funds originating in international cooperation, implementing REDD+ for payment by results, must be treated not only from the perspective of corporate governance principles or good public governance practices or private sector, which are normally mentioned in the literature on the subject, but must go further, with a postulate of Steps of Environmental Public Governance, which encompass the normative, management, representation and environmental steps or gradations.

When mentioning the steps, it is not a case of one being more important than the other, since the steps have the same status of importance, however, it is necessary to be aware that, for methodological reasons, the route in these steps must be observed.

These Steps of Environmental Public Governance will serve as a paradigm for proposed changes aimed at strengthening the governance of the Amazon Fund and other public environmental funds, in order to reduce their instability in the face of changes in government and can be represented in the diagram proposed in the illustration that below:

Figura 7 - Diagrama dos Degraus da Governança Pública Ambiental do Fundo Amazônia



Fonte: elaborado pelos autores (2021).

With the strengthening of the elements involved in these four dimensions, it will be possible to envision a future for the Amazon Fund as a perennial and effective mechanism for reducing deforestation in the Amazon Forest, within the scope of the Legal Amazon, and combating environmental degradation, in addition to contribute to guiding the implementation and governance of other public environmental funds originating in international cooperation.

5 FINAL CONSIDERATIONS

This study was carried out with the purpose of answering which characteristics of the Amazon Fund's Governance would reduce its instability in the face of changes in government.

The literature review provided the study of the main theoretical concepts involved in the research, especially the conceptualization of REDD+, the Amazon Fund, the National Council for the Legal Amazon and Governance Theory. To condense and understand the theoretical framework applied to the research problem and objectives of the thesis, together with the propositions presented, sixteen interviews were carried out

with four semi-structured questions, in which respondents were people who had technical or academic involvement with the Amazon Fund and agreed to be interviewed.

The conclusions, therefore, are presented below, as a result of the research carried out in search of answers to the research problem and propositions presented. Regarding the idea that considers that the Amazon Fund represents a Government Policy and not a State Policy, the research and data analysis confirmed this proposition, since the Amazon Fund was conceived as the result of true State Policy, despite It is possible for there to be a distancing from the ideals that underpinned that State Policy, in accordance with the interests of a given government, in which a certain agenda of interests can be strengthened or weakened, as is the case with the environmental agenda.

In relation to the mention that, as a Public Fund that originates from international cooperation, the Amazon Fund depends on the ideologies and intentions of the existing government at a given moment and throughout the management of the fund, the analysis and discussion brought to light the conclusion that This understanding is confirmed, because, although State Policy gave rise to the Amazon Fund, it cannot be forgotten that the orientation of a National State is subject to change, according to the ideology of a given government, which can break with the understandings and conceptions of the State issued at a previous time.

Regarding the possibility of posing that the Amazon Fund would have more stability if a normative means were found that would keep it intact, with strict rules for its alteration, suspension or exclusion, regardless of changes in government, the results of the analysis confirmed this statement, a since the Amazon Fund, although it was created and internalized in the Brazilian legal system, through a decree, which is the applicable legal diploma for such procedures arising from international agreements and treaties, could have gone through a process of legalization, that is, of transformation of its structure, which would come into existence through law, which is a type of normative diploma, with stricter rules for formation and also for its dissolution, which can only be changed by the National Congress.

Thus, even if some elements of the Amazon Fund's governance structure could be regulated by decree or resolution, with the aim of not rigidifying its structure, the legal basis would not allow the FA to be changed abruptly.

So, in this thesis the scientific postulate Steps of Environmental Public Governance was created, which necessarily follows the path to strengthening the

governance of the Amazon Fund, and other public environmental funds, through four steps or theoretical gradations that are the normative, management, representation and environmental issues, which will serve as a paradigm for proposed changes aimed at strengthening the governance of the Amazon Fund, in order to reduce its instability in the face of changes in government.

An integrated and strengthened governance of the Amazon Fund that considers the regional aspects of the Amazon Biome and the characteristics of the Legal Amazon could be the answer to these challenges.

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Authors' Contribution

Both authors contributed equally to the development of this article.

Data availability

All datasets relevant to this study's findings are fully available within the article.

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