FOOD SYSTEMS
NDC SCORECARD

Brazil Assessment

September 2025

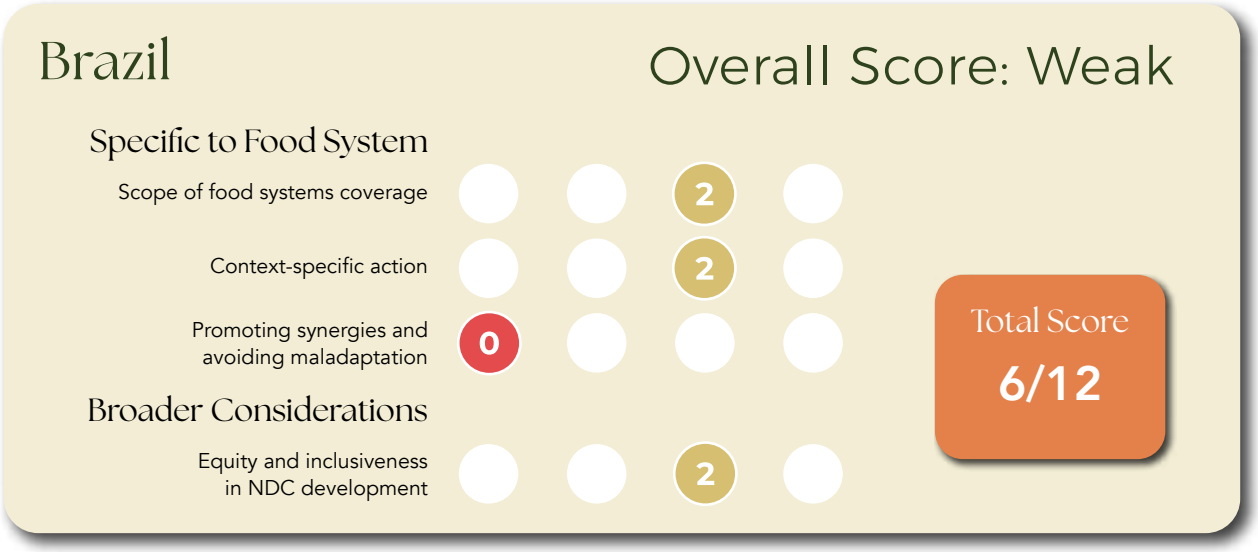
I. Introduction

Brazil is a large, climatically diverse, upper-middle-income country (Brazil's NDC: National Determination to Contribute and Transform [NDC], p. 26) with a high-impact diet (see Food Systems NDC Scorecard methodology, Appendices II, IV). Brazil's 10,900 km coastal zone is one of the largest in the world (NDC, p. 26). Brazil is made up of six major biomes: the Amazon (49.5%), the Cerrado (23.3%), the Atlantic rainforest (13%), the Caatinga (10.1%), the Pantanal (1.8%), and the Pampa (2.3%) (NDC, p. 26). This unique biome profile makes Brazil host to high levels of biodiversity (NDC, p. 26). Brazil has conservation units, or protected areas, covering 1,579,417.53 km² (18.5%) of its continental area and marine conservation units covering an additional 961,248.01 km² (NDC, p. 26). In 2022, 31.6% of Brazil's population lived in poverty, and 5.9% lived in extreme poverty (NDC, p. 27). However, by the end of 2023 the extreme poverty rate was reportedly 4.4%, and by 2024 Brazil was removed from the UN Hunger Map (Global Alliance Against Hunger and Poverty, 2025). Brazil also has high rates of deforestation from food system expansion (see Food Systems NDC Scorecard methodology, Appendix III, and MapBiomas Brasil, "challenges and opportunities" and infographic, 2025; for deforestation generally, see also TerraBrasilis, PRODES, 2025). Brazil notes that it is already experiencing climate impacts, including fires, droughts, and extreme rainfall (NDC, p. 2).

Brazil submitted its NDC on November 13, 2024 (NDC Registry). As the incoming COP30 presidency, Brazil has worked alongside the COP28 and COP29 presidencies (forming the COP Presidencies Troika) to raise ambition in NDCs (Troika Letter, March 2024). Brazil's Interministerial Committee on Climate Change set an "economy-wide target of reducing its net greenhouse gas emissions by 59 to 67 percent below 2005 levels by 2035, which is consistent, in absolute terms, with an emission level of 1.05 to 0.85 GtCO2e, according to the most recent inventory data" (NDC, p. 23). Specific sectoral targets for achieving those numbers are outlined in Brazil's climate plan (not yet concluded), which includes strategies for both mitigation and adaptation, with emphasis on a just transition and a crosscutting approach (NDC, p. 11). The NDC also describes Brazil's plan to end illegal deforestation in the Amazon and Cerrado biomes and save native vegetation, which will enable achievement of "the goal of net zero emissions by 2050" (NDC, p. 15). The Brazilian government has executive, legislative, and judicial branches, which have "established the Pact for Ecological Transformation between the three branches of the Brazilian State" (NDC, p. 3). Brazil also has three levels of government, federal, state, and municipal (NDC, p. 6), and reports taking a whole-of-government, whole-of-economy, and whole-of-society approach to its NDC (NDC, p. 10).

This NDC was evaluated according to the Food Systems NDC Scorecard methodology, using the documents below. All scores are based on evaluations of the NDC and documents cited within each area of the assessment. Where not specified, in this assessment "NDC" may refer to content within the NDC submission document or other documents analyzed as part of the NDC (see Appendix).

For Brazil, we analyzed the NDC, Plano Setorial para Adaptação à Mudança do Clima e Baixa Emissão de Carbono na Agropecuária 2020–2030 (Sectoral plan for adaptation to climate change and low carbon emissions in agriculture and livestock 2020–2030 [ABC+]), and Plano de Transformação Ecológica (Ecological transformation plan [ETP]). For additional information on policies considered in this evaluation, please see the Appendix. Original documents not available in English were translated using DeepL.



II. Scope of Food Systems Coverage (0–3 points)

TOTAL AREA SCORE = 2 POINTS (MEDIUM)

In this area, the scorecard framework evaluates whether the NDC or policies referenced within the NDC addresses each stage of the food system to assess the full extent of the country's climate mitigation and adaptation potential. The stages are as follows: (1) food production; (2) food loss; (3) food processing; (4) food distribution; (5) food consumption, including food access, diets, and nutrition; and (6) food waste. This area does not assess the policies' benefits or harms; these considerations are addressed in subsequent areas of this assessment. The NDC will receive a "strong" score of 3 points if it addresses all subareas; a "medium" score of 2 points if it addresses at least food production, food consumption, and either food loss or waste; a "weak" score of 1 point if it addresses at least one subarea; and an "absent" score of 0 points if no subarea is addressed.

Since Brazil's NDC demonstrates action at the food production, food loss, and food consumption stages of the food system but does not demonstrate action at the food processing, food distribution, and food waste stages, the NDC received **a medium score of 2 points** for the scope of food systems coverage area.

(1) Food production
The NDC demonstrates action at the food production stage through adaptation objectives, financial commitments, and technological innovation. For example, the NDC describes a national objective to promote "resilient production and regular access to healthy foods" (NDC, p. 12), and the Amazon Fund contributes to the development of socio-biodiversity production chains for foods like Brazil nuts, seeds, oils, açai, and cocoa (NDC, p. 21).

(2) Food loss
The NDC demonstrates action at the food loss stage through preventive agricultural practices. For example, the ABC+ states that irrigated systems "reduce the vulnerability of production systems to periods of drought and the risk of crop loss due to extreme events" (ABC+, p. 45).

(3) Food processing
Nothing in the NDC suggests action in this subarea.

(4) Food distribution
Nothing in the NDC suggests action in this subarea.

(5) Food consumption
The NDC demonstrates action at the food consumption stage by including, as one of the national adaptation objectives, the promotion of "sustainable and resilient production and regular access to healthy food of adequate quality and quantity" (NDC, p. 12). The NDC does not explain or give examples of what constitutes healthy food or suggest that this measure also seeks to ensure that these foods are sustainable (see subarea 5 in the context-specific action area below for further discussion on the lack of action overall in the NDC on the issue of sustainable food consumption).

(6) Food waste
Nothing in the NDC suggests action in this subarea.

III. Context-Specific Action (0–3 points)

TOTAL AREA SCORE = 2 POINTS (MEDIUM)

In this area, the scorecard framework evaluates the depth of food systems integration within the NDC through a framework of seven critical subareas for climate change mitigation and adaptation in the food system: (1) addressing food insecurity and malnutrition, (2) mitigating emissions in food production, (3) reducing fossil fuel use in the food system, (4) reducing agricultural deforestation, (5) shifting from high-impact dietary patterns, (6) reducing food loss and/or waste, and (7) enhancing climate-resilient food production. Subareas 6 and 7 are evaluated for all countries, and the other five are evaluated if applicable to a given country.

Subarea 1 is evaluated for all countries except high-income countries. Although food insecurity is present in high-income countries, this subarea is assessed only for low- and middle-income countries where the prevalence of food insecurity and malnutrition are associated with greater climate vulnerabilities. Subareas 2 and 3 are evaluated for high- and upper-middle-income countries only. Subarea 4 is scored for countries that are ranked among the 25 countries with the highest rates of agricultural deforestation according to Global Forest Watch data, and subarea 5 is evaluated for countries with a high-impact diet—countries whose consumption of animal-source foods (ASFs) exceeds EAT-Lancet recommendations by 25%.

The action in each applicable subarea is first assessed as strong, medium, weak, or absent:

- Actions are strong when a specific policy has been adopted or a plan to adopt a specific policy is in place.
- Actions are medium when an intent to take action is mentioned (i.e., no detailed implementation plan exists).
- Actions are weak if only a descriptive mention of it is included and absent when no action is mentioned.

On the basis of these assessments, the NDC will receive a strong, medium, weak, or absent rating for the area as a whole. (See more details in the Food Systems NDC Scorecard methodology, p. 7.)

Subareas 1–3 were evaluated because Brazil is an upper-middle-income country, and subarea 4 was evaluated because Brazil is ranked as a country with a high rate of deforestation from food system expansion. Subarea 5 was evaluated because Brazil exceeds EAT-Lancet recommendations for ASF consumption, and subareas 6–7 were evaluated as they are for all countries.

Since Brazil's NDC demonstrates strong action in six subareas and no action in one, it received **a medium score of 2 points** for the context-specific action area.

(1) Addressing food insecurity and malnutrition
The NDC demonstrates strong action to address food insecurity and malnutrition. For example, in its NDC, Brazil presents a plan to use sovereign bonds to replenish the National Climate Change Fund, which will help support programs fighting poverty and hunger, such as the Bolsa Familia, introduced in 2003 (Center for Public Impact, 2019); Continuous Payments Benefits; and the Food Acquisition Program (NDC, p. 18). The NDC also lists "food and nutritional security" as one of Brazil's adaptation plans in development (NDC, p. 12).

(2) Mitigating emissions in food production
The ABC+ demonstrates strong action to mitigate emissions in food production. For example, the ABC+ encourages the expansion of the Direct Planting System for grains and vegetables; the system for vegetables would diversify species through crop rotation and help maintain cover soil throughout the growing season (ABC+, pp. 52–53).

(3) Reducing fossil fuel use in the food system
The NDC demonstrates strong action to reduce fossil fuel use in the food system. For example, the NDC indicates an overall commitment to decarbonizing the energy matrix, which will impact electric agricultural machinery (NDC, p. 3). The ABC+ also addresses fossil fuel reduction in the food system through the Direct Planting System—it requires less fossil fuel use and increases the efficiency of fertilizer nutrients so less fertilizer is needed for the same amount of food production (ABC+, p. 54).

(4) Reducing agricultural deforestation
The NDC demonstrates strong action toward reducing agricultural deforestation. For example, in its NDC, Brazil notes a plan to incorporate federal assets through the use of "geotechnologies to promote land-title regularization" and help fight deforestation (NDC, p. 4). Brazil indicates it will continue to monitor and control deforestation and forest degradation with the assistance of national technology, including the DETER/PRODES satellite monitoring systems of the National Institute for Space Research (NDC, p. 8). The NDC also describes policies that help with "efforts to achieve zero deforestation," including the Action Plan for the Prevention and Control of Deforestation in the Amazon and the Action Plan for the Prevention and Control of Deforestation in the Cerrado Biome (NDC, pp. 32–33).

(5) Shifting from high-impact dietary patterns
Although Brazil's per capita supply of animal products indicates consumption significantly exceeding EAT-Lancet recommendations, nothing in the NDC suggests action in this subarea (see Food Systems NDC Scorecard methodology, Appendix IV).

(6) Reducing food loss and/or waste
The NDC demonstrates strong plans to reduce food loss. For example, the ABC+ states that Brazil intends to increase the use of irrigated systems, which it says will protect crops during droughts, reducing the risk of loss (ABC+, p. 45). Although nothing in the NDC suggests action to reduce food waste, the NDC was assessed as strong in this subarea in accordance with the methodology (see Food Systems NDC Scorecard methodology, pp. 7–8).

(7) Enhancing climate-resilient food production
The NDC demonstrates strong action toward enhancing climate-resilient food production through the ABC+. For example, the plan says that it will promote "Integrated Crop-Livestock-Forest Systems" and states that these improve the "adaptive capacity and resilience of agricultural production systems in the face of climate change" (ABC+, p. 58). The plan also discusses intended activities such as developing new methods "for the conservation and sustainable use of genetic resources, biodiversity, soil, and water, which increase the resilience of and adaptive capacity of agricultural production systems in the face of climate change" (ABC+, p. 99).

IV. Promoting Synergies and Avoiding Maladaptation (0–3 points)

TOTAL AREA SCORE = 0 POINTS (VERY WEAK)

Measures put forth in the NDC can promote synergies with other sustainability, social, and health objectives. These measures could also conflict with the same objectives. In this area, the scorecard framework evaluates the extent to which the NDC has sought to promote synergies and avoid maladaptation or make trade-offs with other sustainable development objectives. This is a two-step evaluation process. The first step is an assessment of whether the NDC considers seven topics in relation to the food system that support sustainable development synergies: (1) nutrition; (2) One Health, animal health, and/or animal welfare; (3) other health considerations; (4) human rights; (5) biodiversity, nature, and ecosystems; (6) gender; and (7) small-scale producers. For each synergistic subarea addressed 0.5 points are given, up to a maximum of 3 points.

Brazil's NDC **received 1.5 points in the synergies main subarea** because it addresses three of the seven synergistic topics.

The second step is an assessment of the NDC for risks of maladaptation related to the inclusion of five to eight high-risk activities: (1) expansion of agricultural frontier; (2) increasing production of crops such as soy, corn, rapeseed, wheat, and sugar cane for animal feed and energy; (3) increasing pesticide use; (4) intensification measures that threaten the livelihood of small-scale farmers, pastoralists, and fishers; and (5) increasing water consumption. The remaining high-risk activities are evaluated only for high- and upper-middle-income countries: (6) intensification of animal agriculture (and expansion of animal agriculture subsectors), (7) increasing consumption of particular animal products in a country that already exceeds by 25% or more EAT-Lancet levels for ASF consumption, and (8) increasing fertilizer usage.

Brazil's NDC **lost 4 points in the maladaptation main subarea** because it engages in four of the high-risk activities considered.

For each synergistic subarea, the NDC receives 0.5 points up to a maximum of 3 points. For each maladaptive high-risk activity, the NDC loses 1 point. The number of points subtracted from high-risk activities or policies *can equal but not exceed* the number of points gained for the synergistic topics mentioned.

Since the maladaptation score of 4 points exceeds the synergies score of 1.5 points, the NDC received **a very weak total score of 0 points** for the promoting synergies and avoiding maladaptation area.

Synergies

(1) Nutrition
The NDC states that among the 16 sectoral and thematic adaptation plans Brazil is developing, one is on "food and nutritional security" (NDC, p. 12). The NDC also considers nutrition through its national adaptation objectives (NDC, p. 12). The second of these objectives is to have sustainable production that enables regular access to quality healthy food (NDC, p. 12).

(2) One Health, animal health, and/or animal welfare
Nothing in the NDC suggests that Brazil considers this subarea in the context of food systems.

(3) Other health considerations
Nothing in the NDC suggests that Brazil considers this subarea in the context of food systems.

(4) Human rights
Nothing in the NDC suggests that Brazil considers this subarea in the context of food systems.

(5) Biodiversity, nature, and ecosystems
The ABC+ discusses an integrated landscape approach, a multifunctional agricultural strategy intended to promote effective conservation of natural resources with productive land use in accordance with land-use planning and the economic valuation of ecosystem services (ABC+, p. 34). The ABC+ states that incentivizing rural properties to comply with environmental laws can promote the recovery and conservation of soil, water, and biodiversity (ABC+, p. 34).

(6) Gender
Nothing in the NDC suggests that Brazil considers this subarea in the context of food systems.

(7) Small-scale producers
The ABC+ considers small-scale producers in its goal of achieving integrated agriculture (ABC+, p. 23). The plan states that support will be given to "family farms, agrarian reform settlements, traditional communities and peoples, and small producers" (ABC+, p. 23).

Maladaptations

(1) Expansion of agricultural frontier
The ETP presents plans to increase the extraction and export of nontimber forest products, such as "leaves, fruits, flowers, seeds, nuts, hearts of palm, roots, bark, fibers, essential oils, oilseeds, latex, resins, gums, herbs, bamboo, ornamental plants, fungi, and [unspecified] animal products," as well as other economic activities, including tropical fishing and fish farming (ETP, pp. 74–75). Although the ETP states or implies that these plans are forest-compatible, the activities involve significant risks of impacts on nature or land use, particularly where the policies to promote the activities do not include sufficient safeguards. However, given the lack of explicit intent to expand agricultural frontier, no points were deducted. In addition to the policy outlined in the ETP, the NDC asserts that Brazil "will continue to demonstrate that it is possible to sustainably expand agricultural production while guaranteeing food security and energy security through the sustainable production of biofuels" (NDC, p. 15), which raises concerns, although no points were deducted for this policy either.

(2) Increasing production of crops primarily for nonfood uses (animal feed and energy)
The NDC and ABC+ repeatedly mention increasing biofuel production. One of the national mitigation objectives in the NDC is to replace fossil fuels through the promotion and development of sustainable biofuels and electrification solutions (NDC, p. 14). The NDC states that Brazil plans to continue expanding agricultural production with the intent to guarantee food security and energy security through biofuels (NDC, p. 15).

(3) Increasing pesticide use
Nothing in the NDC suggests that Brazil engages in this high-risk activity.

(4) Intensification measures that threaten the livelihood of small-scale farmers, pastoralists, and fishers
Nothing in the NDC suggests that Brazil engages in this high-risk activity.

(5) Increasing water consumption
The ABC+ indicates that an estimated 55 million hectares of land are suitable for intensification or expansion (over pasture areas) of irrigated agriculture (ABC+, p. 72), which would increase the amount of land in need of regular watering, risking water scarcity.

(6) Intensification of animal agriculture and expansion of animal agriculture subsectors
Brazil intends to increase intensive finishing, a system where cattle raised for beef are typically confined to small areas and fed specific food to make them reach slaughter weight faster (ABC+, pp. 80–81). The ABC+ states that intensive finishing will benefit the environment since each animal will produce less methane because they will be slaughtered at a younger age and that this will free up pasture land for other uses (ABC+, p. 80). However, the plan fails to discuss the extremely negative impact on the animals' welfare, such as the health effects of rapid weight gain, or the risk that the total amount of methane produced would not decrease, despite the animals' shorter lifespans, given Brazil's intention to increase the number of cattle slaughtered each year (see also IPCC, Special Report on Climate Change and Land, 5.1.4.3).

While Brazil has been implementing intensive finishing for several years, the country's emissions from enteric fermentation have continued to increase (Brazil's National Inventory Report of Anthropogenic Emissions by Sources and Removals by Sinks of Greenhouse Gases, p. 69). Intensive finishing also increases the risk of disease transmission, both between the animals and to humans (Koyun et al., "Disease Occurrence in and the Transferal of Zoonotic Agents by North American Feedlot Cattle"). The ABC+ states that the goal is to slaughter an additional five million cattle from intensive-finishing operations between 2020 and 2030, and Brazil estimates that about 10 million cattle from such operations were slaughtered in 2020 alone (ABC+, pp. 22, 80).

(7) Increasing consumption of particular animal products in a country that already exceeds by 25% or more EAT-Lancet levels for ASF consumption
The ETP states, "The recovery of a potential area of 40 million hectares of pastureland could meet the demands for animal protein and boost the production of grains and other foods in Brazil over the next 10 years, without the need to open new areas that are currently preserved with forests and other forms of native vegetation" (ETP, p. 76). As consumption of animal products in Brazil significantly exceeds EAT-Lancet levels and consumption in some categories, such as poultry, continues to rise (Our World in Data, "Per Capita Meat Consumption by Type," 2025), supporting any upward shifts in demand for animal protein constitutes a maladaptation.

(8) Increasing fertilizer usage
Although we did not find explicit evidence of plans to increase fertilizer usage and thus no points were deducted, Brazil's indicated plan to slaughter 500,000 more cattle each year from intensive-finishing operations will require an increase in production of energy-rich animal feed, such as grains, corn, and soybeans, which all need a lot of fertilizer to maintain high productivity. (See Ysamat, "Brazil Prioritizes Reducing Its Foreign Dependence on Fertilizers," 2023, noting that in Brazil the demand for fertilizer is expected to increase as overall crop production rises.)

V. Equity and Inclusiveness in NDC Development (0–3 points)

TOTAL AREA SCORE = 2 POINTS (MEDIUM)

In this area, the scorecard framework evaluates the NDC on the main subareas of equity and inclusiveness throughout the NDC's development. This NDC as a whole was scored on this area, not just the NDC's content concerning food systems. Each main subarea was scored up to 3 points, and the total score is the average of the two main subarea scores.

Brazil's NDC received **a medium total score of 2 points** for the equity and inclusiveness area.

Equity

The scorecard framework evaluates equity through (1) equitable 1.5°C alignment, (2) just transitions, (3) consideration of the needs of marginalized and/or vulnerable groups, and (4) equitable finance. Subarea 4 is evaluated only for high-income countries on whether they commit to financing for developing countries. The equity main subarea will receive a strong score of 3 points if all issues are addressed, a medium score of 2 points if two or three issues are addressed, a weak score of 1 point if one issue is addressed, or an absent score of 0 points if no issues are addressed.

Brazil's NDC received **a weak score of 1 point for the equity main subarea** because it addresses subarea 3 but not subareas 1 or 2.

(1) Equitable 1.5°C alignment
The NDC sets an economy-wide target to reduce GHG emissions by 59%–67% below 2005 levels by 2035 (NDC, p. 23).

Equitable 1.5°C alignment is assessed according to the fair shares assessment approach of the Civil Society Equity Review (CSER), using the Climate Equity Reference Calculator. Under this analysis, a country's emissions reduction is determined to contribute its mitigation fair share if the country meets either of two CSER benchmarks, each corresponding to different but reasonable visions of equity.

In the Climate Equity Reference Calculator analysis, Brazil's target emissions levels are adjusted according to the non-LULUCF portions of these emissions (see the Climate Equity Reference Calculator analysis of Brazil for more on this adjustment and the Food Systems NDC Scorecard methodology, p. 11, for details on how the Climate Equity Reference Framework considers emissions reduction from LULUCF and how this can affect a target's assessment).

According to the 1850 High Progressivity benchmark, the low end of Brazil's emissions-reduction range falls short of its mitigation fair share by 6.2 t CO2-e per capita, while the high end of its emissions-reduction range falls short by 5.3 t CO2-e per capita. According to the 1950 Medium Progressivity benchmark, the low end of Brazil's emissions-reduction range falls short by 5.9 t CO2-e per capita, while the high end of its reduction range falls short by 5.3 t CO2-e per capita. Since Brazil's planned reductions do not meet either benchmark, the country is not considered equitably aligned with efforts toward 1.5°C.

(2) Just transitions
The NDC does not include concrete measures to promote just transitions, so this subarea was considered not addressed in the NDC. However, the NDC does contain broad references to just transitions in the development of new policies. For example, the NDC notes that Brazil's new climate plan will include, in addition to mitigation and adaptation, the Transversal Strategy, which covers five themes, including just transitions and socio-environmental impacts (NDC, p. 10). Additionally, guidelines in the National Adaptation Strategy specifically call for consideration of just transitions in adaptation actions (NDC, p. 11). Similarly, one of the 10 guidelines under the National Mitigation Strategy is "just and inclusive transition" (NDC, p. 13). The NDC also includes a section dedicated to "just transitions and climate justice," which states, "the National Policy on Climate Change, under review, will unprecedentedly incorporate the concepts of just transition and climate justice into its legal framework" (NDC, p. 23).

(3) Specific consideration of the needs of marginalized and/or vulnerable groups
The NDC provides specific consideration of the needs of marginalized or vulnerable groups, including women, youth, and Indigenous Peoples. It considers needs in relation to "gender," as opposed to women specifically. For example, Brazil's commitment to promoting climate justice includes addressing gender inequalities (NDC, p. 23). Gender is similarly included in the context of climate justice in the guidelines of the National Adaptation Strategy (NDC, p. 11). Regarding youth, one of the five objectives of the Pact for Ecological Transformation is the "consideration of the rights of children and future generations" (NDC, p. 3). Finally, the NDC commits to promoting climate justice, including "in particular the rights of indigenous and traditional populations, in the face of climate change" (NDC, p. 23).

Under the National Adaptation Strategy, 16 plans are being developed, including one on Indigenous Peoples (NDC, p. 12), and the guidelines for the National Mitigation Strategy call for "articulation between sectoral mitigation policies and other public policies to generate co-benefits," including a "guarantee of the rights of traditional peoples and communities and indigenous peoples" (NDC, p. 14).

(4) Equitable finance
This subarea was not analyzed for Brazil.

Inclusiveness in NDC Development

Inclusiveness in NDC development was evaluated on whether the following groups were included in the NDC's development: (1) multiple government ministries, (2) departments and agencies of government, (3) subnational bodies, (4) the private sector, (5) academia, (6) civil society organizations, (7) Indigenous Peoples, and (8) other vulnerable and/or marginalized groups, earning 0.5 points for each for a maximum of 3 points.

Brazil's NDC received **a strong score of 3 points for the inclusiveness main subarea**.

The NDC describes the process of developing the NDC and climate plan, which included consultations across "bodies at different levels of government, the private sector, civil society and the scientific community," as well as the participation of "indigenous peoples, traditional peoples and communities," and academia (NDC, p. 26). Brazil also utilized broad public participation to develop the climate plan through the Participatory Brazil Platform, which allowed citizens to send proposals directly (NDC, p. 26).

VI. Analysis and Conclusions (Total score 0–12 points)

BRAZIL'S NDC TOTAL SCORE = 6 POINTS (WEAK)

Brazil's NDC received **a weak total score of 6 points out of 12**. This score is based on evaluations of the NDC, ABC+, and ETP. Although the NDC is clear that the National Climate Plan will be central to the NDC's implementation, this plan was not included in the evaluation, as it was not finalized before the release of this assessment.

Brazil's NDC could benefit from further incorporation and amplification of existing policies. For example, the National Plan for Agroecology and Organic Production (PLANAPO), in addition to being relevant to mitigation and adaptation in production, has relevance to processing and distribution. Additionally, the National Productive Forests Program (PNFP), which supports recovering degraded land for use in family farming and the promotion of agroecology, is relevant to mitigation and adaptation. However, PLANAPO and PNFP are not referenced in Brazil's NDC.

In the **scope of food systems coverage area**, Brazil's NDC received a **medium score** because although it demonstrates action in the food production, food loss, and food consumption stages, it lacks action in the food processing, food distribution, or food waste stages.

In the **context-specific action area**, the NDC received a **medium score** because it demonstrates strong action in six subareas and no action in one. Brazil is a country with a high-impact diet, but the NDC does not have policies about shifting from high-impact to lower-impact dietary patterns. The ABC+ discusses Brazil's intent to promote the Direct Planting System for vegetables and grains, stating that using this system for vegetable production could help "mitigate the negative impacts generated by the conventional vegetable production system" and secure the vegetable production chain's inclusion in discussions on issues related to climate change and sustainable development (ABC+, pp. 52–54). If this practice does become more commonplace, it could be an opportunity for Brazil to develop plant-forward policies that have the co-benefits of increased food security, improved health, and decreased food-related emissions.

In the **promoting synergies and avoiding maladaptation area**, the NDC received a **very weak score**; it earned 1.5 points in the synergies main subarea because it considers three synergistic topics but lost these points because Brazil engages in multiple high-risk maladaptive activities. The NDC indicates that Brazil plans to expand biofuel production into degraded pasture lands, increase irrigation, and slaughter five million additional cattle through intensive finishing over a 10-year period. Further, plans to expand production to satisfy demand for animal proteins—even though Brazil's ASF consumption levels far exceed EAT-Lancet recommendations—carry significant risks of maladaptation, particularly with the persistent increase in consumption of some ASFs, such as poultry. Despite engaging in these high-risk activities, Brazil presents its intensification of animal agriculture and agricultural expansion for energy as being progressive and sustainable.

In the **equity and inclusiveness in NDC development area**, the NDC received a **medium score** because although the NDC shows that all identified groups were included in its development, the NDC addressed only one subarea under equity. The NDC does not contain concrete measures to promote just transitions, and Brazil's emissions-reduction pledge is not equitably aligned with 1.5°C and falls short of its mitigation fair share.

The following are some ways Brazil could substantially improve its NDC score in accordance with this evaluation: (1) developing policies to reduce food waste (e.g., redirection initiatives such as food banking, which could also aid in addressing food insecurity); (2) developing policies and plans to start shifting from its current high-impact dietary patterns toward lower-impact ones—this could include promoting a shift toward a more vegetable-rich diet, especially in schools and other public institutions; (3) reducing, not expanding or intensifying, animal agriculture; (4) increasing Brazil's emissions-reduction pledge to at least meet its mitigation fair share; and (5) detailing specific measures to promote just transitions.

Appendix

Documents Evaluated

- Brazil's NDC: National Determination to Contribute and Transform
- Plano Setorial para Adaptação à Mudança do Clima e Baixa Emissão de Carbono na Agropecuária 2020–2030 (Sectoral plan for adaptation to climate change and low carbon emissions in agriculture and livestock 2020–2030)
- Plano de Transformação Ecológica (Ecological transformation plan)

Document Selection

An NDC submission typically references a number of policy documents. In some cases, these policy documents are referenced to provide context clarifying the content of the NDC. In other cases, these policy documents are referenced because they form part of a country's contribution to mitigating and adapting to climate change.

Where a country considers the documents integral to its climate change response, the Food Systems NDC Scorecard considers the content of these documents, if adequately referenced in an NDC submission, to be part of the NDC.

As a reference's intended function is not always clear, the Food Systems NDC Scorecard considers it holistically:

- How the NDC discusses the policy document.
- Location of the reference. For example, if the reference is within the planning processes section of an "information to facilitate clarity, transparency and understanding" table, this is a strong indication that the policy was incorporated into the NDC.
- Content of the referenced policy document itself—namely, the extent to which it considers climate change and therefore constitutes part of the country's climate policy framework.
- The Party's overall policy framework—for example, whether a cited policy is active rather than obsolete or superseded by other policy documents and whether other policy documents should perform the same function.

For Brazil, the NDC submission, ABC+, and ETP were included in this analysis. Brazil's NDC references the ABC+ in the context of the National Mitigation Strategy's accompanying sectoral plans (NDC, p. 15). The NDC also references the ETP as "supporting the implementation of the Climate Plan," stating that it will "respond to mitigation and adaptation needs in the face of the climate crisis while repositioning the Brazilian economy in a new cycle of low-carbon economic growth" (NDC, p. 17). Although the NDC is clear that the National Climate Plan is central to the NDC's implementation, this plan was not included, as it was not completed before the release of this assessment.

Scope of Assessment

This evaluation focuses on a food system perspective. While evaluating equity and inclusiveness more broadly, it does not specifically assess other sectors (such as energy) or indicate the quality of a country's climate policy overall. Additionally, the scoring reflects the presence or absence of particular types of action or consideration within the areas and subareas examined. This does not necessarily reflect ambition in the depth of action. For example, a policy to slightly mitigate food production emissions in a subsector will count equally in scoring to a policy to significantly mitigate emissions. The scores should be understood as indicators to consider alongside the fuller analyses. Finally, while NDCs are critical policy instruments, implementation is necessary to translate their ambition into action. Accordingly, an ambitious NDC alone does not guarantee effective action, just as the ambitiousness of action is not limited to the content of an NDC.

Acknowledgments

This assessment was undertaken by April Foreman, Ally Grimaldi, Olivia Ruthven, and Walter Sánchez-Suárez using the Food Systems NDC Scorecard methodology. The core partners for the assessment phase of the Food Systems NDC Scorecard project are Mercy For Animals, Center for Biological Diversity, EAT, Global Alliance for Improved Nutrition, and Global Law Alliance for Animals and the Environment at Lewis & Clark Law School.

We would also like to thank Wanderson Costa for their time spent reviewing and providing feedback.

We wish to acknowledge other initiatives and reports that have provided inspiration for this project, including the Healthy NDCs Scorecard, Initiative on Climate Action and Nutrition (I-CAN), Food Forward NDCs, Enhancing Food Systems for NDCs, Animals for Climate Action, and *A Practical Guide to Assessing Food Systems in Nationally Determined Contributions*.

Please contact the Food Systems NDC Scorecard project (info@foodsystemsndcscorecard.org) with any feedback, comments, or questions.