FOOD SYSTEMS
NDC SCORECARD

Brazil Assessment Update

October 2026

I. Introduction

The Food Systems NDC Scorecard's initial assessment (conducted in September 2025) evaluated Brazil's most recent Nationally Determined Contribution (NDC), along with two of the relevant domestic policies the NDC presents as part of its climate change response: ABC+[1] and ETP.[2] Because the Food Systems NDC Scorecard methodology assesses both the NDC itself and any available referenced materials representing domestic institutional arrangements, both documents were included in the analysis.

The Food Systems NDC Scorecard methodology evaluates food systems integration across four areas: 1) Scope of Food Systems Coverage, 2) Context-specific Action, 3) Promotion of Synergies and Avoidance of Maladaptation, and 4) Equity and Inclusiveness in NDC Development. In the initial assessment from September 2025, Brazil's NDC received a **total score of 6 points out of a possible 12**, reflecting weak integration of food systems into climate action in the NDC.[3]

The 2025 assessment found that Brazil's NDC lacked measures related to food processing, food distribution, and food waste, and, although Brazil has high-impact dietary patterns,[4] the assessment found that Brazil's NDC did not include action to shift from such dietary patterns.[5] It also found incomplete consideration in the NDC of synergies between food systems and other priorities as well as a number of maladaptive actions, such as plans to increase biofuel production or to increase the number of cattle slaughtered through intensive finishing.[6] Moreover, it found that although the NDC contained a number of measures important to equity and inclusiveness, including consideration of the needs of marginalized and/or vulnerable groups and that the NDC development process was inclusive, the NDC's mitigation ambition did not meet expectations for equitable 1.5°C alignment.[7]

In March 2026, Brazil published Plano Clima, the implementation mechanism for its NDC. Plano Clima is an expansive policy, which includes sectoral plans for mitigating emissions and adapting to climate impacts, several of which direct reform of the food system. Plano Clima, although referenced in Brazil's 2024 NDC, was not yet published when the NDC was released and, therefore, was not evaluated in the initial Scorecard assessment conducted in 2025.

This analysis updates the scoring of Brazil's NDC under the Food Systems NDC Scorecard methodology to reflect Plano Clima's guidelines, and also offers additional insights on Brazil's 2025 Food Systems and Climate Framework—an ambitious framework for aligning food systems with climate goals that Brazil has not yet incorporated into its NDC.[8,9]

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[1] Ministério da Agricultura, Pecuária e Abastecimento [MAPA], *Plano Setorial para Adaptação à Mudança do Clima e Baixa Emissão de Carbono na Agropecuária 2020–2030* [ABC+ Plan] (2021) (Brazil).

[2] Ministério da Fazenda [MF], *Plano de Transformação Ecológica* [Ecological Transformation Plan] (2024) (Brazil).

[3] Food Systems NDC Scorecard, Brazil Assessment (September 2025) available at https://cdn.foodsystemsndcscorecard.org/media/sites/641/2025/09/NDC-Scorecard-Brazil-Assessment_Sep-22.pdf, 11.

[4] The Scorecard evaluation considers whether a country's consumption of animal-source foods exceeds the guidance of the EAT-Lancet Planetary Health Diet by 25%. *See Food Systems NDC Scorecard Methodology Paper* (June 2025) available at https://cdn.foodsystemsndcscorecard.org/media/sites/641/2025/10/NDC-Food-Systems-Scorecard-Methodology-Paper-V2.pdf, 6-7 (describing the EAT-Lancet Planetary Health Diet).

[5] *Food Systems NDC Scorecard*, Brazil Assessment, *supra* note 3 at 5.

[6] *Id*. at 6-11.

[7] *Id*. at 9.

[8] The Food Systems and Climate Framework for Public Policies was a proposal published in 2025 by the National Secretariat for Food Security and Nutrition of the Ministry of Social Development and Assistance, Family and Fight Against Hunger and was intended to be a referential document for policy makers within the food system. Within Plano Clima's adaptation plan, the Sectoral Plan for Food and Nutritional Security includes a goal to develop the Food Systems and Climate Framework for Public Policy by 2027, despite the Framework already being published at the end of 2025

[9] Where not specified, in this assessment "NDC" may refer to content within either the direct NDC submission document or other documents analyzed as part of the NDC; Part I includes ABC+ and ETP policy documents, Part II incorporates Plano Clima in addition to the documents in Part I, and Part III further adds the Food Systems and Climate Framework. Original documents not available in English were machine translated by Google.

II. Plano Clima

Plano Clima's consideration of food systems directs Brazil's national climate policy away from production-centric strategies and toward a strategy that integrates emission reduction activities across the broader food system. Compared to the ABC+ and ETP that Brazil originally identified in its NDC, Plano Clima represents a more thorough response to the need for heightened ambition while offering implementation guidelines that enhance the role of food systems in reducing emissions.

Scope of Food Systems Coverage

The original Scorecard assessment found Brazil's NDC to include actions related to some stages of the food system—production, food loss, and food consumption—but lacking measures related to food processing, food distribution, and food waste. A major development in Plano Clima is the addition of mitigation and adaptation measures related to food processing, distribution, and waste—all previously assessed as 'absent' from Brazil's NDC.

According to Plano Clima, Brazil plans to address the mitigation of energy use and emissions originating from food processing.[10] Brazil also plans to provide support for "family farming," an agricultural system where the work and management are done mainly by family members on small or medium-sized lands, while also recommending the mapping of local production and processing of alternative proteins, such as plant-based, fungi, and precision fermentation products.[11]

To ensure that national food distribution frameworks supply vulnerable populations with fresh food, Plano Clima calls for the construction of urban agroecological corridors and the mapping of food deserts for future remediation efforts.[12] Two sectoral plans introduce measures for reducing waste, including policies for modernizing supply centers with shelf-life-extending technologies and reclaiming organic waste for fertilizer production.[13]

By incorporating actions regarding food processing, distribution, and waste, the three stages previously assessed as absent, Brazil's score for Food Systems Coverage has shifted from **medium** to **strong**, increasing the section's score from 2 points to 3 points.

Context-Specific Action

The original Scorecard assessment found nearly all Context-Specific Action to be strongly represented within the NDC, but, due to the absence of action geared toward addressing high-impact dietary patterns, the section's final score was 2 out of 3 points (**medium**). Plano Clima demonstrates **strong** action toward addressing high-impact dietary patterns, increasing the Context-Specific Action score from 2 points to 3 points (**strong**).

Plano Clima's Sectoral Plan for Food and Nutrition acknowledges that average meat consumption in Brazil—at both the highest and lowest income levels—is well above maximum recommended levels.[14] Plano Clima continues to note that "excessive [beef] consumption is associated with the development of diseases such as certain types of cancer, diabetes, and cardiovascular diseases, in addition to having a high environmental impact (carbon and water footprints)."[15] Plano Clima demonstrates concrete action to address excessive consumption of meat through planned actions to "disseminate the messages of adequate and healthy eating from the Dietary Guidelines , which states that "choosing diets based on a variety of foods of plant origin with sparing amounts of foods of animal origin implies the choice of a food system that is relatively equitable, and less stressful to the physical environment, for animals and biodiversity in general."[16]

[10] Ministério do Meio Ambiente e Mudança do Clima [MMA], *Plano Clima Mitigação: Plano Setorial de Agricultura e Pecuária* [Sectoral Plan for Agriculture and Livestock] at 112–13 (Action AGR.E.15) (2026) (Brazil).

[11] *Id.* at 119-120 (Action AGR.E.18).

[12] *Id.* at 74 (AGRI.I.12), 98–99 (AGR.E.08); Ministério do Meio Ambiente e Mudança do Clima [MMA], *Plano Clima Adaptação: Plano Setorial de Agricultura Familiar* [Sectoral Plan of Family Farming], at 38, 96 (Action A1.M37); Ministério do Meio Ambiente e Mudança do Clima [MMA], *Plano Clima Adaptação: Plano Setorial de Segurança Alimentar e Nutricional* [Sectoral Plan for Food and Nutritional Security], 41 (Action A1.M4) (2025) (Brazil).

[13] *Plano Clima Mitigação: Plano Setorial de Agricultura e Pecuária*, *supra* note 10 at 33, 35, 96–97; *Plano Clima Adaptação: Plano Setorial de Segurança Alimentar e Nutricional*, *supra* note 12 at 47 (Target M18, Action A1.M18).

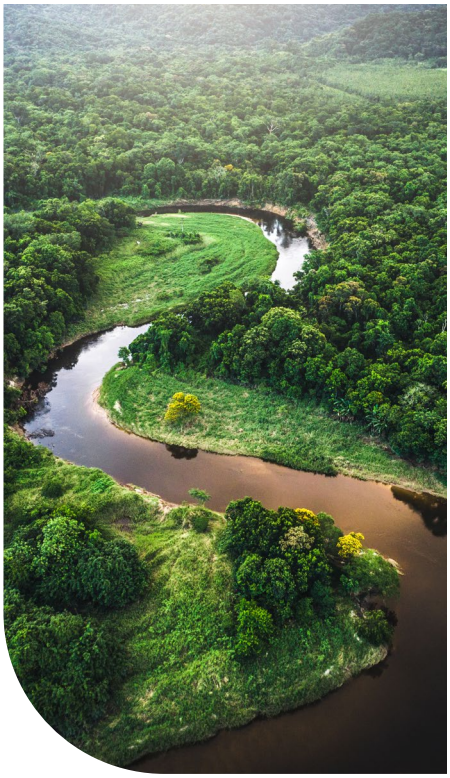
[14] *Plano Clima Adaptação: Plano Setorial de Segurança Alimentar e Nutricional*, *supra* note 12 at 18-19 (2025) (Brazil)

[15] *Id.* at 19.

[16] *Id.* at 55 (Action A3.M33). Ministry of Health of Brazil, *Dietary Guidelines for the Brazilian Population*, at 31 (2015) (Brazil).

Promoting Synergies and Avoiding Maladaptations

In the original Scorecard assessment, Brazil's NDC received 0 points (very weak) for promoting synergies and avoiding maladaptations. While Plano Clima adds new synergies related to One Health, human rights, and gender, the overall score for this area remains 0 points due to the maladaptations identified.



Plano Clima includes a Just Transition and Climate Justice sectoral plan, recognizing the climate crisis as a threat to human rights and social justice.[17] The sectoral plan heavily incorporates goals and objectives intended to increase gender empowerment and indigenous rights.[18] These are supported by actions in other sectoral plans, such as promoting the productive inclusion of 52,000 rural women with access to technical assistance and rural credit, creating of woman-led native seed networks to secure food sovereignty, and ensuring the territorial security of indigenous and quilombola populations.[19] These actions are reinforced by references to already existing nutrition-based policies, such as the Dietary Guidelines for the Brazilian Population and Brazil's Basic Food Basket (cesta básica de alimentos), which excludes Ultra-Processed Foods (UPFs)[20] while supporting minimally processed foods. Plano Clima also explicity recognizes interdependence between human, animal, and environmental health, in line with the premises of One Health.[21] These additions show a **strong** promotion of synergistic policy, increasing the score to a maximum of 3.

However, the inclusion of maladaptive activities that pose an immediate or long-term threat to other sustainability, social, and health goals continue to outweigh the synergies identified. The Scorecard framework weighs synergistic policies against maladaptive ones; each maladaptive policy subtracts one point from the aggregate score gained by synergistic policies. Plano Clima includes maladaptive activities that increase production of crops primarily for nonfood uses and that support intensification of animal agriculture. For example, Plano Clima includes action to "expand the sustainable production of biomass and raw materials for biofuels"[22] as well as action to increase "intensive finishing by 5 million animals slaughtered."[23]

By subtracting 1 point for each maladaptation, the cumulative score for promoting synergies and avoiding maladaptations—including the initial assessment's score of -4 for maladaptations—is 0 points (**very weak**).

Equity and Inclusiveness in NDC Development

Lastly, the previous assessment scored Equity and Inclusiveness at a medium level (2 points), due in part to a lack of concrete measures to promote just transitions. As mentioned above, Plano Clima contains a sectoral plan on Just Transition and Climate Justice within its Cross-cutting Strategy for Climate Action. This includes an objective to transform the labor market through initiatives promoting the "inclusion of informal workers in the green labor market" and developing "incentives for informal entrepreneurs and self-employed workers to formalize their businesses in sustainable sectors."[24] Overall, this area earned an additional .5 points, increasing the score to 2.5 points (**strong**).

[17] See *generally, Ministério do Meio Ambiente e Mudança do Clima* [MMA], *Plano Clima: Estratégia Transversal de Transição Justa e Justiça Climática* [Cross-Cutting Strategy for Just Transition and Climate Justice] (2026) (Brazil).

[18] *Id.* at 17, 58–59, 66, 68, 71.

[19] *Plano Clima Mitigação: Plano Setorial de Agricultura e Pecuária, supra* note 10 at 143, 100–101 (Action AGR.E.09), 130 (Action AGR.E.23); MMA, *Plano Setorial de Agricultura Familiar, supra note* 14 at 27–28, 31 (Action A.M5), 32 (Actions A.M8–A.M10).

[20] Plano Clima refers to the Dietary Guidelines for the Brazilian Population for a definition of ultra-processed foods as "industrial formulations made entirely or mostly from substances extracted from foods (oils, fats, sugar, starch, and proteins), derived from food constituents (hydrogenated fats and modified starch), or synthesised in laboratories from food substrates or other organic sources (flavour enhancers, colours, and several food additives used to make the product hyper-palatable)."

[21] See *Plano Clima Mitigación: Plano Setorial de Agricultura e Pecuária, supra* note 10 at 20 (stating, "It is becoming increasingly relevant to include aspects for a transition of food systems in an equitable, humane and sustainable way, valuing One Health and animal welfare actions."). See also *Plano Setorial de Agricultura Familiar, supra note* 14 at 16 (noting the "unprocessed foods that make up the basic food basket." (emphasis in original)).

[22] *Plano Clima Mitigação: Plano Setorial de Agricultura e Pecuária, supra* note 10 at 90–91 (Action AGR.E.04), (2026) (Brazil)

[23] *Id.* at 44, 57 (Action AGR.I.04).

[24] MMA, *Plano Clima: Estratégia Transversal de Transição Justa e Justiça Climática, supra* note 17, at 58.

Total Score

By adopting Plano Clima, the overall score for Brazil's NDC under the Food Systems NDC Scorecard has increased 2.5 points. This increase heavily impacts the aggregate assessment of how comprehensively food systems are integrated into Brazil's NDC, shifting it upward two levels from **weak** to **strong**. Because Plano Clima does not remove any of the maladaptive policies identified in the original assessment, this update stops short of assessing Brazil's current NDC as exhibiting a **very strong** integration of food system action. However, Plano Clima indicates an intention to expand the role of food systems in achieving climate goals.

Scorecard Area	Initial Assessment (2025)	Plano Clima Update (2026)
Food System Coverage	2	3
Context-Specific Action	2	3
Synergies & Maladaptations	0	0
Equity & Inclusiveness	2	2.5
Total Score	6 points (weak)	8.5 points (strong)

III. The Food Systems and Climate Framework

Brazil's Food Systems and Climate Framework for Public Policies is a reference document published by the Ministry of Social Development and Assistance, Family and Fight Against Hunger to guide public policy at all levels of government. The Framework aims to provide a scientifically-grounded, transformative vision for future food system ambition. The National Secretariat for Food Security and Nutrition launched the Framework to help all levels of government tackle the growing connection between food systems and climate change, while expanding the movement and action of public policies that consider the entire food system.

The implementation of Framework's recommendations would be a step forward to those of Plano Clima. Within Plano Clima's adaptation plan, the Sectoral Plan for Food and Nutritional Security includes a goal to develop the Food Systems and Climate Framework for Public Policy by 2027,[25] despite the Framework already being published at the end of 2025. As focus turns to implementation, the Framework's implementation should extend beyond adaption. For example, the Framework includes recommendations to encourage a shift toward plant-based, healthy diets, which, the Framework notes, could mitigate 45 million tons of carbon annually.[26] In addition, the Framework promotes ambitious actions, such as advocating for policy makers to limit regulatory barriers to food donation, increasing the amount of redistributable edible surplus, and recovering of unsafe food (waste) through composting.

The Framework also highlights the hidden costs of food systems and proposes compensatory tax mechanisms for products with significant environmental impacts—such as ultra-processed and animal-based foods. It also calls for reorienting subsidies and fiscal policies to account for the negative externalities of carbon-intensive production models.[27]

[25] Plano Clima Adaptação: Plano Setorial de Segurança Alimentar e Nutricional, *supra* note 12 at 52 (Goal M 26).

[26] Ministério do Desenvolvimento e Assistência Social, Família e Combate à Fome [MDS], Secretaria Nacional de Segurança Alimentar e Nutricional [SESAN], *Marco de Referência de Sistemas Alimentares e Clima para Políticas Públicas* [Food Systems and Climate Reference Framework for Public Policies], 63 (2025) (Brazil)

[27] *Id.* at 48.

While Plano Clima serves as the government's operational roadmap, incorporating the Framework's ambitious directives into Brazil's NDC would further strengthen the level of food system integration in Brazil's climate policies. In fact, there is a specific recommendation in the Framework that its principles, guidelines, and pathways are integrated into the monitoring and formulation of national and global targets for the NDC.[28]



IV. Conclusion: Brazil's Climate Policy and Food System Action

Brazil's integration of food systems action into climate policy has evolved significantly, moving from the production-centric foundations of the original NDC to the more comprehensive vision of Plano Clima. By taking action on critical, previously unaddressed areas, Brazil has committed to a more ambitious climate policy than its 2024 NDCs reflected, raising its Scorecard from 6 to 8.5. Looking further ahead, the vision of the Food Systems and Climate Framework demonstrates important progress toward the much needed transformation of the current food system and to effectively tackling the climate crisis.

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

This update reflects policies published as of June 2026.

[28] *Id.* at 50.