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COP30 IN BELÉM: BILLIONS IN WORKS, TRANSPARENCY LACKING

TRANSPARÊNCIA INTERNACIONAL Brasil

TECHNICAL NOTE

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Analysis reveals serious shortcomings in the disclosure of data on environmental licenses, contracts, and agreements for COP30 works — the largest climate event on the planet, held in the heart of the Amazon

For the preparation of COP30, to be held in Belém in November 2025, the Brazilian federal government allocated specific resources for 23 projects, totaling R$ 2.8 billion (US$ 519,5 million) transferred via the federal budget, BNDES (Brazil's National Bank for Economic and Social Development), and Itaipu (binational public hydroelectric company jointly operated by Brazil and Paraguay).Of the 23 projects, 20 are being or were executed by the Pará State Government and the Belém City Hall, which are responsible for the bidding and contracting processes.

Among the federally funded projects, notable examples include the construction of the Parque Linear Doca (R$ 365.8 million / US$ 67,872,000) and the expansion of Rua da Marinha (R$ 248.5 million / US$ 46,104,000).

Other highlights, through agreements between the Federal Government and the Organization of Ibero-American States (OEI), include two contracts for the assembly of temporary structures for the COP30 Blue and Green Zones (totaling R$ 250 million / US$ 46,378,000).

This analysis of the transparency of COP30-related works reveals that neither the Federal Government, nor the Pará State Government, nor the Belém City Hall publish complete information on the environmental licenses issued for public works.This means there is a lack of data on licensed activities, mitigation and compensation measures, license numbers, types, issuance dates, validity, and status.

The absence of this information prevents the understanding and monitoring of the social and environmental impacts of these projects, which are being implemented to enable the main international meeting on climate change, held in the Amazon biome.

Another finding of the analysis shows that BNDES and Itaipu — the main funders of COP30 works, financing 21 projects in Belém totaling R$ 2.75 billion (US$ 510,204,000) — do not make available the full agreements signed with the Pará Government and Belém City Hall, nor the actual amounts transferred at each stage of the works.

This means it is not possible to track the evolution of public spending on the projects or access detailed information about the obligations set out in the agreements.

The analysis also found that none of the three entities (Federal Government, Pará State Government, and Belém City Hall) disclose information about public hearings and consultations, highlighting the challenges for social control and participation in the planning and implementation of works for a major event.They also do not publish open-format databases on the public works they fund and/or execute for COP30, reducing the granularity of available information and preventing analysis of invested resources and project progress using automation tools and broad data use, modification, and sharing by society.

On the other hand, all entities have created specific transparency pages for COP30, which can be considered a good practice.They publish general information that allows understanding which projects are funded, the total value, and the public entity responsible for execution.The Pará Government provides full contracts and bidding documents for most projects, and Belém City Hall does so for all, being the only evaluated entity to do so.The Federal Government also publishes full agreements with OEI, including information on contracts, bidding processes, and expenses carried out by the organization.

In summary, the analysis reveals transparency deficits in infrastructure works — a sector historically marked by corruption scandals due to the high value and nature of such investments.The lack of transparency in environmental licensing processes is particularly concerning, especially in the context of preparations for the largest climate negotiation event on the planet.

Regarding the results for each federative entity, the analysis showed better performance by Belém City Hall in terms of providing complete information and documents related to contracts and bidding for COP30 works.The worst performance in this area was by the Federal Government, as there is little data and no documents available for works funded by BNDES and Itaipu.

In August 2025, an investigation by the Federal Prosecutor's Office (PGR) pointed to signs of corruption in a R$ 142 million (US$ 26,341,000) contract between the Pará Government and a consortium of companies for the execution of the Perna Norte project from Rua da Marinha to Canal do Bengui, in Belém, under COP30.[1] After complaints, the bidding was suspended,[2] but one of the investigated contractors still holds two contracts for COP30 works with the state,[3] totaling more than R$ 354.4 million[4] (US$ 65,738,000), reinforcing the urgency of ensuring proper control and oversight of spending and investments for the event.

1 Source: *Metrópoles*. Available at: https://www.metropoles.com/colunas/fabio-serapiao/exclusivo-investigacao-da-pgr-aponta-corrupcao-em-licitacao-milionaria-da-cop30. Accessed on 15 August 2025.

2 Source: *g1*. Available at: https://g1.globo.com/politica/noticia/2025/08/07/dino-abre-inquerito-para-investigar-grupo-suspeito-de-fraude-em-licitacao-da-cop-30.ghtml. Accessed on 23 October 2025.

3 Source: *Metrópoles*. Available at: https://www.metropoles.com/colunas/fabio-serapiao/empresa-sob-suspeita-de-corrupcao-tem-contrato-de-r-123-mi-da-cop30. Accessed on 23 October 2025.

4 Source: *Folha de S. Paulo*. Available at: https://www1.folha.uol.com.br/ambiente/2025/08/obra-de-r-231-mi-do-governo-do-para-para-cop30-une-investigadas-por-corrupcao-e-superfaturamento.shtml. Accessed on 23 October 2025.

HOW THE SURVEY WAS CONDUCTED

The analysis consisted of verifying the availability of information and documents related to public works contracted for the realization of COP30 in Brazil on specific pages about the event, on the transparency portals of the Federal Government, BNDES, Itaipu, the Government of the State of Pará, and the City Hall of Belém, as well as the portals of environmental agencies (for the Federal Government, Pará State Government and Belém City Hall).

Assessed Entity	COP30 Specific Websites	Transparency Portals	Portals for Environmental Licenses
Federal Government	https://portaldatransparencia.gov.br/cop30	https://portaldatransparencia.gov.br/ https://www.bndes.gov.br/wps/portal/site/home/transparencia https://www.itaipu.gov.br/institucional/transparencia	https://servicos.ibama.gov.br/licenciamento/consulta_rel_licencia_por_ano.php https://dadosabertos.ibama.gov.br/dataset/licencas-ambientais-de-atividades-e-empreendimentos-licenciados-pelo-ibama/resource/9e4873d3-10d8-464f-a883-88be3b3abf06
Pará State Government	https://www.seop.pa.gov.br/transparencia-seop-cop30	http://transparencia.pa.gov.br/	http://portaldatransparencia.semas.pa.gov.br/#/visao-publica
Belém City Hall	https://cop30.belem.pa.gov.br/	http://portaltransparencia.belem.pa.gov.br/	https://meioambiente.belem.pa.gov.br/licencas/licencas-emitidas/

The structure of the COP30 pages was evaluated based on usability criteria and the centralization of information, as well as the availability of data and documents on contracts, agreements, bidding processes, physical and budgetary execution, issued environmental licenses, and the publication of reports from public hearings and consultations related to the execution of works in preparation for the conference.

RESULTS

1.Transparency Pages on COP30

The starting point of this study is the existence of specific pages and portals of the evaluated entities for publishing information about investments in public works for COP30.Additionally, data disclosed through active transparency on public investments for the conference, including costs and progress of public works, were analyzed on these platforms.

Given the magnitude and complexity of the investments made for COP30, the data must be available in an accessible, centralized, and detailed manner, allowing for social and institutional oversight of these expenditures.

Next, the presence of three important characteristics for accessing public information on the COP30 pages of the three considered entities is evaluated: centralization, usability, and open data.

1.1 Centralization

Based on the COP30 page on the Federal Government's Transparency Portal, the COP30 transparency page of Para's State Department of Public Works (SEOP/PA), and the COP30 website of the Belém City Hall, the goal was to understand whether information about investments in public works for the conference is published in a centralized manner on a single portal.

It was observed that the Federal Government page discloses information about contracts for works financed by the federal budget, BNDES, and Itaipu, as well as contracts and agreements signed by OEI and its subcontractors for the execution of works.

In the case of Pará, the specific page of the State Department of Public Works (SEOP/PA) provides a table listing the works contracted by the State for COP30, as well as links to contracts and bidding processes.

The Belém City Hall has a website dedicated to the event, with a section for transparency, where general information about public works contracted by the municipality is published.To access the contracts and bidding documents, it is necessary to visit the municipality's Transparency Portal.

1.2 Usability

Regarding usability, the existence of mechanisms that make the user experience on these portals more efficient was evaluated.The following were considered:

- Search and data filtering mechanisms;
- Graphic resources, maps, and/or data visualizations;
- Link to access the information request system;
- Link to access the complaint or ombudsman channel;
- Date of last update of the available information;
- Frequently asked questions section.

The Federal Government was the only one to fully meet the usability criteria, offering all these mechanisms on its COP30 transparency page.

The SEOP/PA page that provides data on contracts for COP30 works includes most of the listed items but does not allow searching/filtering of data on the works for the event and does not have a frequently asked questions section.

The Belém City Hall COP30 website has a frequently asked questions section but does not allow filtering of data on works in progress for the conference nor does it use graphic resources that facilitate data understanding.

1.3 Open Data

The existence of open databases containing information about the COP30-related works was also evaluated.Two practices were used as reference: the publication of data organized in a database and in machine-readable formats (.csv, .json, .xml, among others), and the possibility of downloading the data.

None of the three assessed entities publishes an open-format database of the public works they finance and/or execute in preparation for the event.The only one to publish a list with aggregated information about the works is the Government of Pará, and although available for download, the document is in .pdf format — not machine-readable.

The Federal Government publishes the works it finances, as well as those contracted by OEI, but access is segmented into different sections within the COP30 page, according to the entity: OEI, federal budget, BNDES, and Itaipu, making it impossible to download a complete list organized in a single database.

The municipality of Belém also publishes information about works for the conference on its website, but it is not possible to download the list organized in a single open-format database.

The Access to Information Law (Law No.12.527/2011), Article 8, § 3, item II, states that public agencies and entities must make reports available on their websites in various electronic formats, including open and non-proprietary formats, to facilitate citizens' analysis of the information.Publishing open databases allows society to use large sets of public data that can be analyzed using tools such as spreadsheet editors and programming languages to generate new information,

research, and discoveries about public administration.Therefore, the absence of open data on COP30 works constitutes a significant gap in the dissemination of information about the event and highlights the need for governments involved to align with public transparency guidelines and best practices.Without open data, another barrier is imposed on the appropriation of information by managers, researchers, journalists, and civil society in general, hindering the production of analyses and the monitoring of public spending.

2. Publicity of Information on COP30 Works

The infrastructure sector is characterized by complex contracts, multi-stage project execution, and the involvement of various actors, in addition to the high volume of resources involved, making expenditure control challenging.To reduce the risks of corruption and enable social control of the sector, it is essential that public agencies promote transparency of these investments: from the publication of the bidding notice to the delivery of the work.

Given this need, the study evaluated which data, information, and documents are made available through active transparency by the Union (federal government, BNDES, and Itaipu), the Government of Pará, and the municipality of Belém regarding the execution of public works for COP30.

2.1 Contracts and Agreements

Regarding the contracts and agreements signed for the execution of architecture and engineering works and services related to COP30, the study evaluated the disclosure of: (i) general information, including the name of the public agency responsible for the contract or agreement, the source or origin of the funds, the object of the contract, the bidding process number, the contract or agreement and any amendments, the name and tax ID (CNPJ) of the contracted company, and the duration of the contract; (ii) the full text of the contracts or agreements and the bidding process documents.

At the federal level, the transparency of the information evaluated in item (i) varies depending on the related entity.The Federal Government finances two works via its budget: the first, the Sanitary Sewage - Ver-o-Peso Market, for which it signed an agreement with the Government of Pará; and the second, the Renovation of the Belém Air Base, which includes five contracts and is executed by the Air Force.For the work under agreement with the Government of Pará, all listed items are disclosed on the federal Transparency Portal and the Transferegov.br Portal.Regarding the work executed by the Air Force, almost all criteria are met, but for three contracts, the source/origin of the funds is not provided.Additionally, there are

two contracts signed by OEI that include infrastructure implementation for the event, and most items, except for the contract numbers, are publicly available.

BNDES and Itaipu, which finance most of the works, only disclose the object of the financing and the public entity responsible for its execution, lacking information about the source of the funds, bidding process numbers, contracts and agreements, the name and duration of the signed contract.These are important items for verifying potential irregularities in contracting and for monitoring the budget execution of public works.

It is noted that the Federal Government publishes the full text of the contracts, agreements, and bidding documents for only one of the two works it finances — the sewage system at Ver-o-Peso Market.For the renovation of the Belém Air Base, contract information is available, but the documents are not.Regarding infrastructure actions executed by OEI, only the bidding documents for the two contracts signed by the organization are disclosed, as both originated from the same bidding process.

BNDES and Itaipu do not publish the agreements related to the 21 public works they finance for COP30, making it impossible to monitor the terms of resource transfers to the Government of Pará and the municipality of Belém.

Based on the list published by SEOP/PA, the Government of Pará provides all the information listed in item (i) regarding COP30 public works contracts.Regarding the availability of full documents (item ii), the government publishes 19 of the 22 contracts and documents from 15 bidding processes.

The municipality of Belém also discloses all the information analyzed in item (i) on its COP30 website and transparency portal.The municipality provides the full text of contracts and bidding documents (item ii), being the only entity to do so for all signed contracts.

2.2 Physical and Financial Execution

To assess the transparency of the physical and financial execution of contracts and agreements related to COP30 works, the availability of total forecasted, committed, settled, and paid amounts, percentage of physical execution of the works, and images of the progress of the works was verified on the specific COP30 pages and transparency portals of the evaluated entities.

At the federal level, transparency varies according to the funding entity.Total forecasted amounts are disclosed for works linked to OEI, the federal budget, BNDES, and Itaipu.However, total paid amounts are only available for OEI and the federal budget, and committed and settled amounts only for the federal budget.None of the federal entities disclose percentages of physical execution or images of the progress of the works.

In Pará State, based on the list published by SEOP/PA and the state transparency portal,

only the total forecasted amounts and the percentage of physical execution of COP30-related works were identified.Total paid, committed, or settled amounts and images of the progress of the works were not found.

On the COP30 website and the transparency portal of the Belém City Hall, total forecasted and committed amounts and the percentage of physical execution of the works executed by the City Hall were identified.However, total paid and settled amounts and images of the progress of the works were not located.

2.3 Environmental Licences

On the specific COP30 pages, transparency portals, and websites of the licensing agencies of each evaluated entity, information on environmental licenses issued for the execution of conference-related works was researched.

No documents on environmental licensing were found on the pages of Federal Government and the Belém City Hall.In the case of Pará State, only four of the 22 contracts have environmental licenses in their annexes in the list published by SEOP/PA.Of these, three present the same license, expired in 2022, and only one has a valid license, with validity until 2027.

In addition to violating the obligation to disclose information on issued environmental licenses, as per Federal Law No.6.938/1981, the absence of information on possible licenses and environmental studies related to the event's works prevents proper understanding of the socio-environmental impacts of these works, as well as monitoring of mitigation and compensation measures to be fulfilled by the executing agencies.This would already be serious in any context, but is even more so considering that such works are aimed at the largest climate negotiation event in the world, held in the Amazon biome.

2.4 Public Consultations and Hearings

Reports of public hearings and consultations and other forms of public consultation on the works for COP30 were sought on the specific COP30 pages and transparency portals of the evaluated entities.However, no information on social participation processes was found on the platforms of the Federal Government, the Pará Government, or the Belém City Hall.

The lack of detail on social participation in the works in Belém does not allow us to know whether the population, especially those benefiting from or impacted by the projects, was adequately included in the debates and whether their suggestions were considered in the final decision.

RECOMMENDATIONS

Although the Federal Government, the Pará Government, and the Belém City Hall provide an important set of information, several relevant data and documents for preventing corruption and ensuring social control of COP30 infrastructure works are still not publicly available and in the appropriate format.

Given this scenario and contributing to the improvement of transparency of investments in works for COP30 and other major events held by the country in the future, we present the following recommendations:

- Availability, in open format, of information and documents characterizing all work contracts, including the source of funds, bidding process numbers, agreements, contracts and any amendments, name and tax ID (CNPJ) of the executing company, and the contract's purpose;
- Availability of the full content of all agreements signed between BNDES and Itaipu and the Governments of Pará and the Belém City Hall;
- Availability of information on environmental licensing and environmental studies of all works for COP30, including the full license and respective supporting studies, license number, licensing agency name, licensed activity, license type, issuance date, validity, and status (valid, renewed, closed);
- Disclosure of any reports of public hearings and/or consultations and other forms of public consultation regarding the works and architectural and engineering services related to COP30;
- For future major events, availability of all information on public works in a single institutional portal, integrating all data and documents produced by the different federative entities;
- For future major events, availability of information allowing real-time monitoring of the physical and budgetary execution of all works, including expected start and completion dates, budget execution (paid, committed, and settled amounts), percentage of physical execution, images of project progress, and execution of environmental licensing conditions

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Cover image: visit to the construction site of Parque da Cidade, the venue that will host the COP30 program. Photo: Ricardo Stuckert/PR