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Coalition Power and Narrative Hegemony in Brazil's Policy on Payment for Environmental Services

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Article

Coalition Power and Narrative Hegemony in Brazil's Policy on Payment for Environmental Services

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Abstract

This article analyzes the formulation process of the Brazilian National Policy on Payment for Environmental Services (PNPSA), a broad legislative framework that institutionalized a national PES system in Brazil. While the PNPSA encompasses governance structures, financing mechanisms, and implementation guidelines, this article focuses analytically on its most contested dimension: the eligibility of legally mandated conservation areas—Permanent Preservation Areas (APPs), Legal Reserves, and Restricted Use Areas—for PES payments using public resources. The study shows that the combination of dominant coalitions and hegemonic narratives produced a policy outcome consistent with institutional capture under the discourse of sustainability. Two complementary theoretical frameworks are mobilized: the Advocacy Coalition Framework (ACF), which explores how belief systems and policy learning structure coalitions of actors; and the Narrative Policy Framework (NPF), which investigates how policy narratives legitimize positions and

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construct moral meanings. Methodologically, the research applies qualitative content analysis of legislative documents, public hearing transcripts, and news reports, supported by data triangulation. The results reveal the predominance of a coalition composed of agribusiness representatives and allied actors, which reinterpreted the concept of “additionality” and consolidated a moral narrative legitimizing compensation for legally mandated conservation. The discussion shows that while the PNPSA is institutionally innovative, it reinforces historical patterns of power concentration and unequal representation within Brazil’s environmental governance.

Keywords: environmental policy, environmental governance, advocacy coalition framework, narrative policy framework, payment for environmental services (PES).

Coalizões de poder e hegemonia narrativa na política de pagamento por serviços ambientais no Brasil

Resumo

Este artigo analisa o processo de formulação da Política Nacional de Pagamento por Serviços Ambientais (PNPSA), um marco legislativo abrangente que institucionalizou um sistema nacional de PSA no Brasil. Embora a PNPSA abranja estruturas de governança, mecanismos de financiamento e diretrizes de implementação, este artigo concentra sua análise na dimensão mais contestada da política: a elegibilidade de áreas de conservação legalmente obrigatórias — Áreas de Preservação Permanente (APPs), Reservas Legais e Áreas de Uso Restrito — para recebimento de pagamentos por serviços ambientais com recursos públicos. O estudo demonstra que a combinação de coalizões dominantes e narrativas hegemônicas produziu um resultado de política pública consistente com a captura institucional sob o discurso da sustentabilidade. Dois referenciais teóricos complementares são mobilizados: o *Advocacy Coalition Framework* (ACF), que examina como sistemas de crenças e o aprendizado orientado a políticas públicas estruturam coalizões de atores; e o *Narrative Policy Framework* (NPF), que investiga como as narrativas de política pública legitimam posições e constroem significados morais. Do ponto de vista metodológico, a pesquisa aplica análise de conteúdo qualitativa de documentos legislativos, transcrições de audiências públicas e reportagens jornalísticas, com suporte de triangulação de dados. Os resultados

revelam a predominância de uma coalizão composta por representantes do agronegócio e atores aliados, que reinterpretou o conceito de “adicionalidade” e consolidou uma narrativa moral que legitima a compensação pela conservação legalmente obrigatória. A discussão evidencia que, embora a PNPSA seja institucionalmente inovadora, ela reforça padrões históricos de concentração de poder e representação desigual na governança ambiental brasileira

Palavras-chave: política ambiental, governança ambiental, *advocacy coalition framework*, *narrative policy framework*, pagamento por serviços ambientais (PSA).

Poder de coalición y hegemonía narrativa en la política brasileña de pago por servicios ambientales

Resumen

Este artículo analiza el proceso de formulación de la Política Nacional de Pago por Servicios Ambientales (PNPSA), un amplio marco legislativo que institucionalizó un sistema nacional de PSA en Brasil. Si bien la PNPSA abarca estructuras de gobernanza, mecanismos de financiamiento y lineamientos de implementación, este artículo concentra su análisis en la dimensión más controvertida de la política: la elegibilidad de áreas de conservación legalmente obligatorias —Áreas de Preservación Permanente (APPs), Reservas Legales y Áreas de Uso Restringido— para recibir pagos por servicios ambientales con recursos públicos. El estudio demuestra que la combinación de coaliciones dominantes y narrativas hegemónicas produjo un resultado de política pública consistente con la captura institucional bajo el discurso de la sostenibilidad. Se movilizan dos marcos teóricos complementarios: el *Advocacy Coalition Framework* (ACF), que examina cómo los sistemas de creencias y el aprendizaje orientado a políticas públicas estructuran coaliciones de actores; y el *Narrative Policy Framework* (NPF), que investiga cómo las narrativas de política pública legitiman posiciones y construyen significados morales. Desde el punto de vista metodológico, la investigación aplica análisis de contenido cualitativo de documentos legislativos, transcripciones de audiencias públicas y reportajes periodísticos, con apoyo de triangulación de datos. Los resultados revelan la predominancia de una coalición compuesta por representantes del agronegocio y actores aliados, que reinterpretó el concepto de

“adicionalidad” y consolidó una narrativa moral que legitima la compensación por la conservación legalmente obligatoria. La discusión evidencia que, si bien la PNPSA es institucionalmente innovadora, refuerza patrones históricos de concentración de poder y representación desigual en la gobernanza ambiental brasileña.

Palabras clave: política ambiental, gobernanza ambiental, *advocacy coalition framework*, *narrative policy framework*, pago por servicios ambientales (PSA).

1. INTRODUCTION

Climate change represents one of the greatest global challenges of the 21st century, with growing impacts on ecosystems, economies, and populations (Intergovernmental Panel on Climate Change, 2025). In this context, environmental governance has progressively become multilevel, multi-actor, and polycentric, recognizing the relevance of both public and private actors in agenda-setting and policy implementation (Bäckstrand et al., 2010; Ostrom et al., 1999). Among the instruments of this new governance era, market mechanisms—such as Payment for Environmental Services (PES)—have gained prominence through their promise to reconcile conservation with development (Newell, 2008).

In Brazil, environmental governance has undergone considerable institutional transformations since its 1988 Constitution, which incorporated principles of decentralization and participation (Ferreira & Seleguim, 2023; Hochstetler, 2007; Moura, 2016). Despite these formal developments, the expansion of economic instruments has coexisted with persistent power asymmetries, reflected in the disproportionate influence of agribusiness-linked groups and the underrepresentation of traditional peoples and social movements (Corazza, 1996, 2003; Potter & Wolf, 2014). This tension characterizes “New Modes of Environmental Governance” (Bäckstrand et al., 2010)—hybrid forms in which governments share decision-making power with private actors, often under unequal conditions.

Since the 2012 Forest Code revision—which relaxed protection of Permanent Preservation Areas (APPs) and Legal Reserves and created instruments such as the Rural Environmental Registry (CAR), Environmental Reserve Quotas (CRA), and PES—the strengthening of agribusiness-linked coalitions and the conversion of environmental

obligations into remuneration opportunities have been observed (Donadelli, 2016). The Parliamentary Front for Agriculture (FPA) emerged as a key coalition, institutionalizing a lobby capable of strongly influencing the Legislature. As several authors have demonstrated, despite holding formal participation rights, most minority groups in Brazil have very little substantive influence on final environmental decisions (Pompeia, 2021). This dynamic consolidated a pattern that the literature has consistently documented in Brazilian environmental governance. While policies formally espouse objectives of social inclusion and valorization of sociobiodiversity, they operate in practice according to logics that exclude traditional peoples and communities from decision-making processes and from the benefits generated. As Bastos Lima (2021) demonstrates, the structural power of agribusiness manifests itself in control over public institutions and in the definition of policy trajectories, endogenizing private agendas under the pretense of public interest. The Brazilian National Policy on Payment for Environmental Services (PNPSA) formulation process, as this article demonstrates, is consistent with this pattern.

The PNPSA, established by Law No. 14,119/2021 after fifteen years of legislative deliberation, is a clear illustration of these trends. Although framed as an initiative to promote conservation through incentives, the policy emerged from a process shaped by intense disputes among coalitions with divergent interest, particularly over who should receive compensation for providing environmental services and under which criteria (Altmann & Nusdeo, 2023; Benjamin & Akaoui, 2020). While the PNPSA addresses a broad range of PES-related provisions, this article focuses analytically on the controversy that most consistently structured coalition formation and narrative competition throughout the legislative process: the eligibility of APPs, Legal Reserves, and Restricted Use Areas for PES payments using public resources. This focus is empirically grounded—as demonstrated in Section 3, it was the most debated issue across public hearings, appearing in 11 of the 14 sessions analyzed—and it is precisely around this controversy that the dominant narrative was consolidated, and the final policy design was shaped. In the end, the main beneficiaries were not among vulnerable groups, but rather landowners who received compensation for acting according to pre-existing legal obligations.

To demonstrate how this process unfolded, this article adopts a critical-historical perspective on environmental governance, combining two complementary theoretical frameworks: the Advocacy Coalition Framework (ACF), which examines how belief systems and policy learning structure actor coalitions; and the Narrative Policy Framework (NPF), which analyzes how narratives legitimize positions and construct political moralities. The integration of these frameworks offers a lens for interpreting the PNPSA not merely as a sectoral policy but as a discursive and political arena in which coalitions compete to define the legitimate meanings of “environmental services” and “beneficiaries”. The study argues that the PNPSA formulation process was shaped by the interaction among (i) coalitions with varying power and cognitive resources, (ii) moral narratives that framed public debate, and (iii) a representation gap between actors formally invited to participate and those effectively capable of influencing outcomes.

Thus, the specific objectives are to identify the coalitions formed during the PNPSA legislative process; to characterize the policy narratives that structured these coalitions; and to analyze how tensions among them influenced the final policy design. Drawing on qualitative content analysis of legislative documents, public hearing minutes, and journalistic materials for data triangulation, we seek to demonstrate that in Brazilian environmental governance, formal participation does not always translate into substantive deliberative power (Avritzer, 2011; Brito et al., 2025)—and that dominant narratives may, in certain contexts, legitimize the pattern of institutional capture—as characterized by Bastos Lima (2021)—in policies conceived under the sustainability banner.

In addition to this introduction, the article is organized into four sections followed by the final considerations. The first presents the theoretical foundations, situating environmental governance debates in Brazil and presenting the ACF and NPF frameworks. The second describes the research methodology. The third details the empirical findings, identifying actors and coalitions. The fourth discusses the results in dialogue with literature. The final considerations outline directions for future research.

2. ENVIRONMENTAL GOVERNANCE, COALITIONS AND NARRATIVES: ANALYTICAL AND CONCEPTUAL FRAMEWORKS FOR THE PNPSA

Environmental governance is a broad approach that transcends the traditional notion of “environmental policy”, encompassing both formal institutional structures—environmental policies, legislation, norms, and oversight and monitoring bodies—as well as formal and informal inter-institutional arrangements, including pacts and agreements among companies and their associations, social and environmental movements, civil society organizations, research institutions, and Non-Governmental Organization (NGO), which constitute contemporary forms of governance over natural resources and the “commons” (Ostrom, 1990; Seixas et al., 2020).

In Brazil, the formulation and implementation of environmental public policies have undergone significant transformations, with the gradual replacement of the authoritarian model by democratic and participatory processes, influenced by changes in the international political context and by the recognition of the global dimension of contemporary environmental problems (Ferreira & Seleguim, 2023; Hochstetler, 2007; Moura, 2016). These transformations resulted in the emergence of “New Modes of Environmental Governance”, characterized by less hierarchical forms in which governments share some of their political control with civil society organizations, the private sector, NGOs, and other actors (Bäckstrand et al., 2010).

The analysis of the evolution of Brazilian environmental policies reveals that, similarly to other contexts, there has been a transition from the use of command-and-control instruments (regulatory legislation, specific regulations) to economic instruments (quotas, taxes, subsidies, carbon markets) and hybrid mechanisms of private self-management articulated with public authorities (Corazza, 1996, 2003; Potter & Wolf, 2014). This evolution reflects international trends of decentralization, social participation, and of the institutionalization of environmental management, but it is also characterized by the articulation among different actors and interests, evidencing negotiations and compromise between divergent values.

The difference between what is formally stated in terms of participation rights and the actual influence acquired by different groups is, however, an empirical question. A particularly suitable theoretical framework for assessing the dynamic unfolding of plural

policy processes is the Advocacy Coalition Framework (ACF), proposed by Sabatier (1988) and revised in collaboration with Jenkins-Smith (Sabatier & Jenkins-Smith, 1993) and Weible (Weible & Sabatier, 2009). The ACF seeks to understand how policy change occurs and how it is influenced by actor's learning in specific policy subsystems during implementation (Jenkins-Smith et al., 2014; Sabatier, 1988; Sabatier & Jenkins-Smith, 1993). Policy subsystems are semi-independent networks of actors who interact over time, guided by their belief systems, and are crucial for understanding policy formulation, implementation, and evaluation (Sabatier, 1999; Weible et al., 2011). These subsystems are composed of advocacy coalitions, formed when actors perceive shared interests and resources (Sabatier, 2007).

This framework is based on four fundamental premises: (a) the centrality of public policy subsystems as objects of analysis; (b) the need to analyze a minimum temporal trajectory of 10 years; (c) the formation of coalitions among actors; and (d) the interpretation of public policies as reflections of these coalitions' beliefs. These premises structure three analytical axes: coalition formation and maintenance, policy-oriented learning, and changes in public policy design (Weible et al., 2011).

In the ACF, beliefs constitute the central element that guides actor's behavior and coalition formation. The model organizes beliefs into a hierarchical structure of three levels (Sabatier & Jenkins-Smith, 1993). Deep core beliefs represent fundamental normative axioms about human nature, priority values, and basic philosophical orientations, and are highly resistant to change. Policy core beliefs encompass basic normative positions on public policies within a given subsystem, including value priorities, perceptions about the causes of problems, appropriate distribution of authority, and appropriate action strategies. Finally, secondary beliefs refer to more specific aspects of policy implementation, such as instrument design, specific regulations, and resource allocation, and are more susceptible to change based on empirical evidence (Sabatier, 2007). Agreement around policy core beliefs is considered essential for the formation and maintenance of stable coalitions over time.

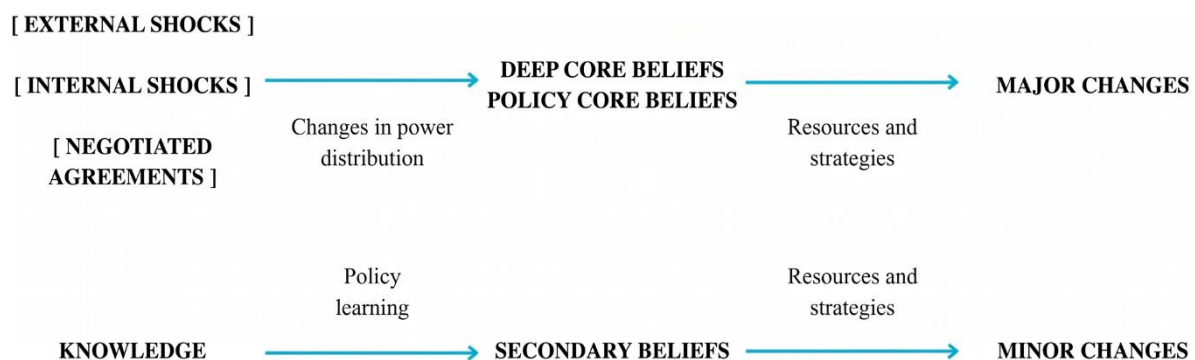
One of the main objectives of the ACF is to investigate change and stability in public policies, understanding their nature and causes (Jenkins-Smith et al., 2014). Policy changes reflect alterations in belief systems: when deep core beliefs change, policy changes tend to

be substantial; when only secondary beliefs are affected, changes are less drastic. In this sense, policy beliefs, defined by the criterion of susceptibility to change, constitute fundamental elements for identifying and characterizing transformations in public policy subsystems (Sabatier, 1988).

The ACF proposes four conceptual pathways for policy change. The first is related to events external to the subsystem, resulting from external shocks, understood as disturbances beyond the control of the actors involved—crises, disasters, or changes in socioeconomic conditions and political regimes (Sabatier & Weible, 2007). The second pathway occurs through internal events, such as conflicts within and between coalitions, political scandals, and failed ideas, which lead actors to rethink their beliefs from new perspectives on the problem (Sabatier & Weible, 2007).

The third pathway comprises negotiated agreements, generally mediated by collaborative institutions that facilitate negotiation between coalitions (Jenkins-Smith et al., 2014). The fourth pathway is oriented toward the long term and is represented by policy-oriented learning, defined as “enduring alterations of thought or behavioral intentions resulting from experience, aimed at obtaining or revising precepts of individual or collective belief systems” (Sabatier & Jenkins-Smith, 1993, p. 42).

Figure 1. Explanatory factors behind policy change in the Advocacy Coalition Framework



Source: Adapted from Ma and Vieira (2020).

Because it is grounded in the concept of “beliefs”, the ACF presents methodological limitations. Actors may prefer not to reveal their true beliefs, impairing empirical

identification. An alternative previously proposed by the literature is the identification of coalitions based on public statements that reveal specific preferences (Donadelli, 2016). For the operationalization of the ACF in the context of environmental policies such as the PNPSA, Donadelli (2016) suggests defining coalitions as a group of actors within a specific subsystem who, while not necessarily coordinated or possessing the same normative beliefs, adopt the same (publicly stated) positions regarding a policy problem.

Because it focuses on public statements as its main object of analysis, the Narrative Policy Framework (NPF) proves to be an interesting complement to the ACF. The NPF provides a quantitative and structured methodology for studying narratives in the process of policy formulation, implementation, and change (Jones & McBeth, 2010). Several advantages are observed in associating ACF hypotheses with NPF methods. Both frameworks advocate a pluralist perspective on policy change, recognizing the participation of a wide range of actors in the political process. The NPF allows identification of relevant actors through public debates, eliminating concerns that these actors may not express their actual normative beliefs. Additionally, the use of predominantly textual narratives reduces possible data sources and modes of analysis, allowing the researcher to focus on textual and content analysis (Donadelli, 2016).

The basic theoretical assumptions of the NPF are grounded in the idea that reality is socially constructed and that public policy narratives are relatively stable over time. These narratives possess specific and identifiable components and play an essential role in human cognition and communication (Shanahan et al., 2018). The NPF operates at three levels of analysis: micro, meso, and macro. At the micro level, the influence of narratives on individual public opinion is investigated, exploring mechanisms such as canonicity and breach, narrative transportation, congruence, and narrator trustworthiness (Green & Brock, 2000; Taber & Lodge, 2006). At the meso level, the focus is on the influence of narratives on the composition of policy coalitions and public policy outcomes. Research has demonstrated how interest groups use narratives to expand or contain the scope of conflict, employing tactics such as victimization or benefit concentration (McBeth et al., 2007). The macro level concentrates on overarching narratives that reflect and shape broad cultural and institutional values, analyzing how policy narratives are constructed and disseminated in national or

international contexts (Jones & McBeth, 2010). At the meso level, the NPF seeks to answer two central questions: (1) How do involved groups construct policy narratives? and (2) What is the effect of these narratives on the public policy-making process? These questions are fundamental for understanding how narratives shape public policies and how they can lead to policy changes. The focus here is on discussing these two general questions. The hypothesis investigated is that a powerful landowner coalition produced a successful, self-serving narrative that influenced the final design of the PNPSA, subtly distorting the conception of payment for environmental services as a tool for enhanced sustainability.

While the ACF and NPF frameworks employed here illuminate how additionality became a contested discursive category around which coalitions and narratives formed, the concept itself originates in, and remains central to, the literature specifically devoted to payments for environmental services. Foundational PES scholarship treats additionality and conditionality as defining design features that distinguish PES from other environmental policy instruments (Engel et al., 2008; Wunder, 2005, 2015), while a more critical strand of this literature has questioned whether a narrow, additionality-centered definition adequately captures the equity and distributive dimensions of PES implementation in unequal contexts (Muradian et al., 2010; Pascual et al., 2010). Read against this literature, the PNPSA dispute over additionality is not merely a discursive contest between coalitions, as the ACF and NPF analysis in this article reveals, but also a substantive instance of a long-standing tension within PES design itself—between efficiency-oriented conditionality criteria and the distributive consequences of applying them in a context of pre-existing land and resource inequality.

3. METHODOLOGY

This research employed multiple sources of evidence to identify coalitions and capture their main narratives, including official documents, public hearings, and journalistic materials. The methodological procedures are described in four stages to ensure study reproducibility.

3.1 Documentary survey and analysis

A comprehensive review was conducted of Bills (PLs), attached bills, amendments, rapporteur reports, and thematic committee reports, as well as NGO documents, available on the Chamber of Deputies and Federal Senate websites. The objective was to systematize the PNPSA legislative process, producing a descriptive and analytical synthesis that enabled understanding of the legislative context and the main changes proposed throughout the deliberation.

3.2 Public hearing survey and content analysis

Public hearings promoted by Federal Senate committees (Permanent Joint Committee on Climate Change and Environment Committee) and Chamber of Deputies committees (Committee on Environment and Sustainable Development and Committee on Agriculture, Livestock, Supply and Rural Development) were analyzed for the period from 2009 to 2020. In total, 9 Senate hearings with 43 speakers and 5 Chamber of Deputies hearings with 25 speakers were analyzed, including legislators, representatives from government agencies, civil society organizations, social movements, private sector entities, and academics. All hearings were transcribed and validated for content analysis, with the aim of identifying governmental actors and non-governmental actors involved in PNPSA formulation. Analysis criteria included identification of hearing representatives, institutions consulted, positions maintained, arguments and evidence presented, and the nature of knowledge employed.

3.3 News clipping

A survey of journalistic materials on the PNPSA was conducted, focusing on commentary in specialized media and major general media outlets. The clipping used keywords such as “PNPSA”, “Payment for Environmental Services”, and “Environmental Services”. Sources consulted included newspapers (*Folha de S. Paulo*, *O Estado de S. Paulo*, and *Valor Econômico*), news agencies (*Agência Brasil*), and specialized portals (*O Eco*, *Nexo Jornal*, *Revista Pesquisa FAPESP*, and *Observatório do Clima*). Civil society publications and

position papers produced by advocacy networks—notably the *Grupo Carta de Belém*, a network of social movements and traditional peoples’ organizations—were also consulted to capture perspectives that circulated outside mainstream media and legislative arenas. This analysis provided input for contextualizing public debate and identifying prevailing media narratives.

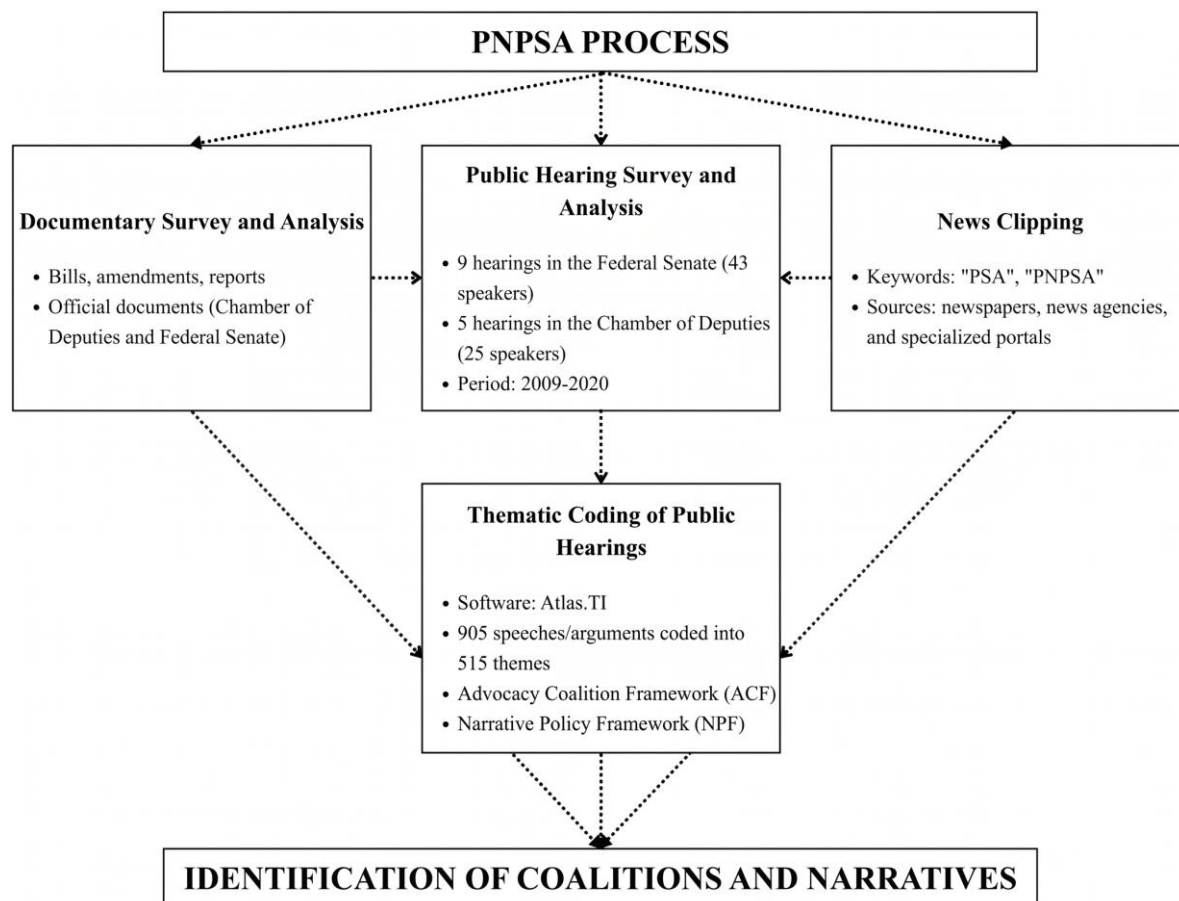
3.4 Thematic coding of public hearing arguments

Content analysis of public hearings adopted the categorical modality (Gibbs, 2009), focusing on identifying thematic passages. Thematic coding of arguments was performed using ATLAS.ti software, producing synthetic frameworks for actor and narrative identification and analysis. Coding involved three stages: identification of thematic narrative axes, categorization of arguments into specific themes, and comparison across the 14 public hearing files. A total of 905 speaker interventions were identified, resulting in 515 thematic codes. Coalition membership was determined through manual reading of all hearing transcripts, following Donadelli (2016) operationalization of the Advocacy Coalition Framework (ACF) for contexts in which actors may not reveal their deep normative beliefs. Under this approach, coalitions are defined as groups of actors who share the same publicly stated positions regarding a specific policy problem, regardless of whether they are formally coordinated or hold identical normative beliefs.

An actor was assigned to a coalition if they explicitly advocated for or against PES eligibility in Permanent Preservation Areas (APPs), Legal Reserves, and Restricted Use Areas in at least one public hearing intervention. For the seven actors who appeared in more than one hearing, classification followed the position expressed across appearances: actors who maintained a consistent position were classified accordingly; actors who did not express a position in an initial hearing but did so in a subsequent one were classified based on the position eventually stated. No actor changed their position between hearings. Actors who addressed other dimensions of the debate—such as financing mechanisms, governance structures, or monitoring—but did not take a position on the central eligibility controversy were excluded from coalition assignment.

The Narrative Policy Framework (NPF) defines policy narratives as structures composed of four essential elements: setting, plot, characters, and moral of the story. The setting establishes the narrative's environment, whether geographical, institutional, or thematic. The plot introduces temporal sequence and causal relationships, structuring coherent explanations. Characters assume roles such as heroes (problem-solvers), villains (those who cause the problem), or victims. The moral presents a policy solution, frequently expressed as a call to action or a concrete proposal for change (Ney, 2006; Stone, 2002; Verweij et al., 2006). Thus, the setting, plot, characters, and moral of the story were also characterized according to NPF methodology.

Figure 2. Methodological procedures and stages for analyzing the PNPSA



Source: Elaborated by the authors.

One of the main challenges in thematic coding was the mobilization of technical-scientific knowledge intertwined with political discourse or denunciation. To ensure accuracy, clear criteria were adopted for argument categorization. For instance, technical-scientific claims (e.g., hydrological models, biodiversity data) were coded separately from normative policy positions; when technical arguments served political purposes (e.g., invoking forest-water relationships to justify landowner remuneration), both dimensions were captured; and denunciations of regulatory failures were distinguished from constructive policy proposals. The diversity of sources required careful data triangulation or double-checking to ensure analytical consistency (Zappellini & Feuerschütte, 2015).

4. REPRESENTATIONS AND COALITIONS: EMPIRICAL EVIDENCE OF THE REPRESENTATIVE GAP IN THE PNPSA

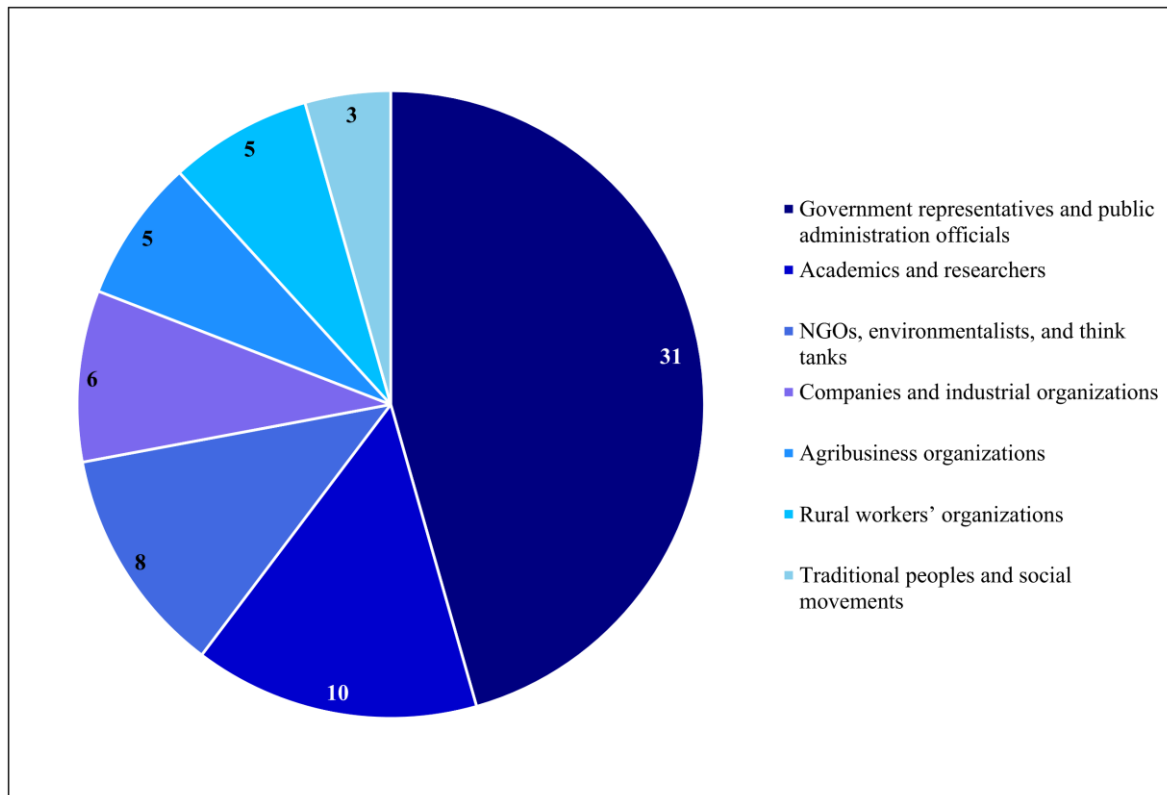
The analysis of public hearings revealed the participatory dynamics and main themes debated in the formulation process of the National Policy on Payment for Environmental Services (PNPSA). The combined application of the Advocacy Coalition Framework (ACF) and the Narrative Policy Framework (NPF) enabled the identification of coalitions and narratives that influenced policy construction. Results are presented according to four analytical perspectives: 4.1 – representativeness; 4.2 – debated themes; 4.3 – coalitions; and 4.4 – narratives.

4.1 Representativeness: patterns of representation and participatory asymmetries in decision-making

A total of 14 public hearings held between 2009 and 2020 were analyzed, with participation from 68 speakers, including representatives from government, the private sector, academia, organized civil society, and social movements. Analysis revealed predominant participation by government representatives and public administration officials (31), followed by academics and researchers (10), NGOs, environmentalists, and think tanks (8), companies and industrial organizations (6), and agribusiness organizations (5) and rural workers'

organizations (5)¹. In contrast, underrepresentation was observed among social movements, Indigenous leaders, *quilombola* and extractivist communities, as well as other traditional peoples (3).

Figure 3. Institutional representation in public hearings analyzed in the Chamber of Deputies and the Federal Senate (2009-2020)



Source: Elaborated by the authors.

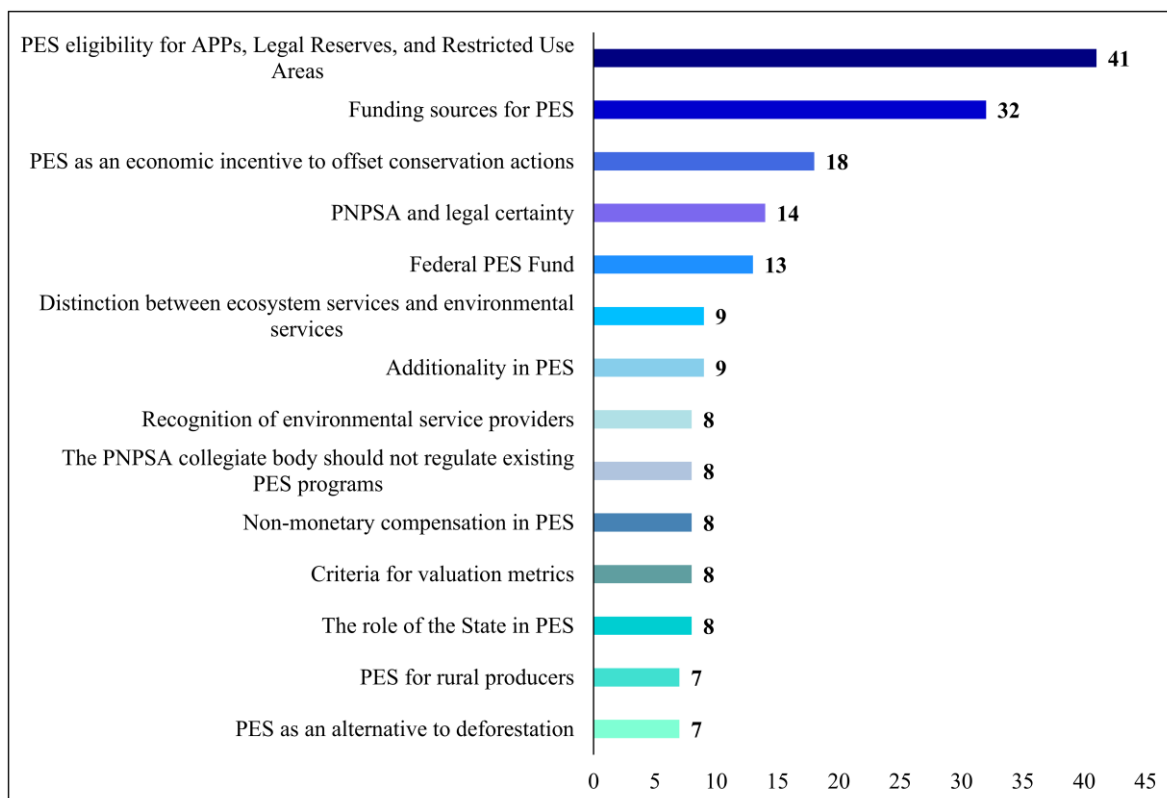
4.2 Debated themes: diversity and priority focuses

Analysis of arguments presented in public hearings resulted in the identification of 905 interventions, which were coded into 515 thematic codes. Figure 4 synthesizes the 15 main

¹ Among government representatives, six belong to the legislative branch. Notable among them are Deputy Anselmo de Jesus (PT-RO) and Deputy Jorge Khoury (DEM-BA), members of the Parliamentary Front for Family Farming (FPAF), as well as Deputy Arnaldo Jardim (Cidadania-SP) and Senator Rodrigo Rollemberg (PSD-DF), respectively vice-president and member of the Parliamentary Front for Agriculture (FPA).

themes identified, classified by frequency of mentions. From the 15 themes identified, four were selected for in-depth discussion: PES eligibility in APPs, Legal Reserves, and Restricted Use Areas; financing sources for PES; PES as an economic incentive for conservation; and legal certainty of the PNPSA. The selection followed two criteria: frequency of mentions across hearings, with the four themes presenting the highest occurrence in the corpus; and analytical centrality, as these four themes constituted the primary axes around which coalition positions diverged and narratives were organized throughout the legislative process.

Figure 4. Thematic coding of arguments: the 15 main themes debated during public hearings



Source: Elaborated by the authors.

The most frequent theme, with 41 mentions across 11 of the 14 sessions, was PES eligibility in Permanent Preservation Areas (APPs), Legal Reserves, and Restricted Use Areas. This prominence reveals intense debate over PES application in these areas, reflecting

concern with defining clear eligibility criteria to ensure PES is directed toward priority conservation areas beyond mere legal compliance incentives.

The second most mentioned theme (32 mentions) was the search for financing sources for PES, highlighting the need for consistent and sustainable financial resources to support programs over the long term, a recurring challenge in Brazilian environmental policies.

The third theme (18 mentions) was PES as an economic incentive for conservation, underscoring its perception as a tool for promoting environmental conservation by offsetting costs associated with sustainable practices through direct financial benefits.

Finally, legal security of the PNPSA emerged as a relevant theme with 14 mentions, indicating the need for a solid regulatory framework that minimizes uncertainties, ensures policy effectiveness, and attracts stakeholder investment.

4.3 Hypothesized coalitions: structure and policy dynamics

The analytical focus centers on the controversy that most consistently structured the PNPSA legislative debate: PES eligibility in Permanent Preservation Areas (APPs), Legal Reserves, and Restricted Use Areas. This focus is not a reduction of the PNPSA's broader scope, but a deliberate analytical choice grounded in the empirical distribution of arguments across hearings—the eligibility question received 41 mentions across 11 of the 14 sessions analyzed, making it the most debated theme in the entire corpus. It is also the axis around which the two main coalitions organized and around which the dominant narrative was consolidated. The combined application of ACF and NPF enabled identification of these two main hypothesized coalitions in the PNPSA debate: the Pro-Sustainable Economic Development Coalition (CPDES) and the Additionality Defenders Coalition (CDA). The former coalition advocates that Permanent Preservation Areas (APPs), Legal Reserves, and Restricted Use Areas should be remunerated through PES regardless of legal obligation. The latter argues that PES should be reserved exclusively for actions beyond legal requirements, ensuring additionality and incentivizing environmental practices that exceed mere legal compliance.

It is important to note that coalition membership does not imply ideological homogeneity. The CPDES brings together actors with heterogeneous profiles and

rationales—agribusiness entities, conservation NGOs, governmental bodies, and rural workers’ organizations—whose convergence was situated specifically around the eligibility question.

The classification of WWF-Brasil and The Nature Conservancy (TNC) within the CPDES illustrates this point. Both supported PES eligibility in APPs and Legal Reserves, but on pragmatic conservation grounds rather than economic compensation arguments. WWF’s representative reframed additionality as behavioral change relative to business as usual, arguing that where landowners lack the capacity to comply with existing law, payment for legally mandated conservation produces outcomes that would not otherwise occur. TNC’s representative argued that legally defined conservation areas are precisely those generating the most relevant environmental services, and that PES should incentivize producers to engage more actively with them. Despite differing rationales, both organizations’ stated positions on eligibility aligned with the CPDES.

CONTAG was likewise classified within the CPDES. One of its representatives acknowledged the legal obligation but argued that legal mandate and financial valuation are not mutually exclusive: without active farmer engagement, legally prescribed conservation remains practically absent. This position placed CONTAG alongside the CPDES on the eligibility question, even if its motivation—support for family farmers—differed substantially from that of agribusiness entities.

These cases illustrate a pattern consistent with ACF theory, in which coalitions often form around shared instrumental positions rather than shared values, uniting actors who agree on what the policy should do while disagreeing on why.

The CPDES comprises diverse actors, including parliamentarians, the federal government, public administrators, agribusiness organizations, companies, industrial organizations, NGOs, think tanks, environmentalists, academics, researchers, and rural workers’ organizations (see Table 1). The CDA, in turn, is formed by academics, researchers, NGOs, parliamentarians, and rural workers’ organizations (see Table 2). Notably, this coalition lacks representation from agribusiness organizations and industrial companies.

Table 1. Summary of CPDES by actor type and institutional affiliation

Actors	Institutional Affiliation
Federal Government and public administration bodies	<i>Ministério do Meio Ambiente</i> (MMA)—Ministry of the Environment; <i>Ministério da Agricultura e Pecuária</i> (MAPA)—Ministry of Agriculture and Livestock; <i>Secretaria Estadual de Meio Ambiente e Recursos Hídricos</i> (SEAMA)—State Secretariat for Environment and Water Resources; <i>Agência Nacional de Águas e Saneamento Básico</i> (ANA)—National Water and Sanitation Agency; <i>Empresa Brasileira de Pesquisa Agropecuária</i> (EMBRAPA)—Brazilian Agricultural Research Corporation
Parliamentarians and legislative consultants	Federal Deputies; Senators; Legislative consultants
Agribusiness organizations	<i>Confederação Nacional da Agricultura e Pecuária do Brasil</i> (CNA)—National Confederation of Agriculture and Livestock of Brazil
Rural workers' organizations	<i>Confederação Nacional dos Trabalhadores na Agricultura</i> (CONTAG)—National Confederation of Agricultural Workers
Companies and industry organizations	<i>Confederação Nacional da Indústria</i> (CNI)—National Confederation of Industry
NGOs, think tanks, and environmentalists	The Nature Conservancy (TNC); World Wide Fund for Nature (WWF); <i>Instituto BVRio</i> —BVRio Institute; <i>Instituto Democracia e Sustentabilidade</i> (IDS)—Institute for Democracy and Sustainability
Academics and researchers	Professors and researchers from the University of Brasília (UnB)

Source: Elaborated by the authors.

Table 2. Summary of CDA by actor type and institutional affiliation

Actors	Institutional Affiliation
Parliamentarians	Federal Deputies
Rural workers' organizations	<i>Conselho Nacional das Populações Extrativistas (CNS)</i> —National Council of Extractivist Populations
NGOs	<i>Instituto Socioambiental (ISA)</i> —Socio-Environmental Institute
Academics and researchers	Professors and researchers from the University of Brasília (UnB)

Source: Elaborated by the authors.

4.4 Dominant narratives and moral contests over justice and efficiency

Analysis of narratives in the PNPSA formulation process followed NPF methodology. Identification of narrative elements (setting, plot, characters, and moral of the story) is presented below.

4.4.1 Setting

The narratives unfolded in Brazil's main institutional arenas: the Chamber of Deputies and the Federal Senate.

Bill No. 792/2007, initiated by Deputy Anselmo de Jesus (PT/RO), was the first to regulate PES in the Chamber, defining environmental services as “flows of matter, energy, and information that, combined with constructed and human capital, produce benefits for human beings”, with payment for those voluntarily developing these benefits (Brasil, 2007, Bill No. 792). The first public hearing on PES was held by CMADS in June 2009, debating compensation for environmental services, the REDD+ mechanism, and the creation of a Federal PES Fund.

In 2012, CMMC held the first Senate hearing, coinciding with approval of the new Forest Code (Brasil, 2012, Law No. 12651), which authorizes PES programs as

compensation for conservation activities in APPs, Legal Reserves, and Restricted Use Areas, marking the growing prominence of narratives about PES eligibility in these areas.

In 2015, Deputy Rubens Bueno (PPS/PR) presented Bill No. 312/2015, establishing the concepts, objectives, and guidelines of the PNPSA. Deputy Evair de Melo (PV/ES), rapporteur in CAPADR, attached it to Bill No. 792/2007 and removed the Federal PES Fund.

Between 2015 and 2020, discussions intensified regarding PES eligibility in APPs and Legal Reserves, as Bill No. 312/2015 did not provide for monetary remuneration in these areas, despite the Forest Code's provision. In August 2019, Deputy Camilo Capiberibe (PSB-AP), presented a substitute allowing for monetary remuneration on private properties, establishing that APPs and Legal Reserves could be remunerated through private contracts, but public resources should be restricted to additionality situations.

The bill proceeded to the Federal Senate in March 2019. Senator Fabiano Contarato (REDE/ES) incorporated thirteen amendments. The CMA eliminated restrictions on PES, allowing public authorities to reward legally required conservation (Brasil, 2019, Bill No. 5028).

The bill was approved on December 16, 2020 by the Senate and on December 21, 2020 by the Chamber, and was enacted as Law No. 14.119 on January 13, 2021 (Brasil, 2021).

4.4.2 Plot

The predominant plot identified in discussions on PES eligibility in APPs, Legal Reserves, and Restricted Use Areas was “Essentiality for the Collectivity”, sustained by the CPDES. This narrative constructs a story in which a small group alone bears the burden of environmental preservation. Although these areas provide essential environmental services to all, the preservation burden falls entirely on private agents, many of whom lack sufficient income or technical conditions to fulfill their legal conservation obligations. Connected to this plot is the inadvertent causal mechanism, which identifies a system failure. From this perspective, PES in these areas should not be interpreted as a “prize” but as a correction of a structural system failure and fair recognition of the public interest burden that private agents assume.

The second most recurrent plot was “PES Additionality”, sustained by the CDA. This narrative emphasizes that PES should be reserved exclusively for actions that transcend legal requirements, ensuring additional value beyond mere legal compliance with the Forest Code. Including APPs, Legal Reserves, and Restricted Use Areas would not promote genuine environmental improvement but merely remunerate pre-existing obligations. Connected to this plot is the intentional causal mechanism: the problem’s origin is attributed not to legal system failure but to inappropriate use of public resources, which compromises the policy’s central objectives by failing to prioritize remuneration for individuals who have historically promoted conservation without legal obligations or remuneration. Paying for legal compliance is classified as an intentional action that nullifies the incentive for improvement and wastes scarce public resources. The “PES Additionality” narrative advocates that financial resources should be strategically allocated only to generate new environmental benefits, maximizing the social return on public investment.

4.4.3 Characters

Character identification classifies actors into three archetypal roles: heroes, villains, and victims. In the dispute over PES eligibility in APPs, Legal Reserves, and Restricted Use Areas, the definition of these roles varies substantially between coalitions, revealing opposing framings about who deserves protection, accountability, and recognition.

For the CPDES, rural producers simultaneously play the roles of victims and heroes. As victims, they are portrayed as an overburdened group bearing the burden of environmental preservation alone, despite performing essential social roles such as ensuring food security. This burden is aggravated by more rigorous environmental requirements than those of international competitors, generating competitive disadvantages. As heroes, they are presented as the true guardians of environmental conservation, performing actions from native vegetation preservation to reforestation and sustainable exploitation, generating benefits that extend beyond private property boundaries to the entire collectivity. The villain is the PES bill itself (specifically Bill 792), which, by excluding APPs and Legal Reserves

from payment eligibility, perpetuates injustice by failing to reward the essential environmental services already provided by this group.

For the CDA, providers of additional environmental benefits—those who go beyond legal obligations—are the victims and heroes. As victims, they are described as a historically frustrated group that maintains voluntarily preserved areas but finds itself overlooked amid pressure from rural producers demanding public resources to fulfill minimum obligations. As heroes, they represent a group that protects additional areas, deserving reward for their voluntary and extraordinary actions that generate additional benefits. The villains are rural producers seeking PES to comply with the Forest Code—characterized as opportunists who waste scarce public resources by demanding payment for pre-existing obligations—and the Forest Code itself, which, by authorizing PES programs for APPs, Legal Reserves, and Restricted Use Areas in its Article 41, reduces the instrument’s additionality and diverts resources from those who truly deserve incentives.

Tables 3 and 4 below present specific examples of narratives according to the roles assumed by characters as proposed by NPF.

Table 3. Heroes, villains, and victims of the narrative according to CPDES definition

Victim	Villain	Hero	Narrative Example
Rural Producers	PES Bill	Rural Producers	Victim: “On the contrary, and fulfilling our duty, the productive sector has the obligation to produce and guarantee the country’s food security, not only economically but also for strategic reasons. However, compared to our competitors, we face much greater requirements. That’s why I bring these slides: to say that APPs and Legal Reserves also need to be included in the PES system.” Villain: “[...] although the texts are different, Bill 792 does not allow PES in areas under administrative restrictions, which strongly affects the entire rural sector. [...] So, for us, the

			text of Bill 312 by Deputy Rubens Bueno is better in this regard because it allows it.” Hero: “We believe that any landowner who undertakes conservation actions on their land [should be compensated]. Conservation actions are not necessarily only preservation, that is, keeping native vegetation intact, but also reforestation actions, restoration actions, and even sustainable economic exploitation, which is provided for in the new Forest Code law. Why should they be compensated for this? Because the benefits extend beyond private property. The social benefits are for everyone in the surrounding community.”
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Source: Elaborated by the authors, based on public hearing transcripts (translated from Portuguese²).

Table 4. Heroes, villains, and victims of the narrative according to CDA definition

Victim	Villain	Hero	Narrative Example
Providers of additional environmental benefits	Rural Producers / Forest Code	Providers of additional environmental benefits	Victim: “Regarding the maintenance of Legal Reserves specifically, I recall that we are experiencing, on the one hand, enormous frustration among those who maintain forest reserves larger than legally required and are counting on CAR implementation so that their CRAs gain real market value and, on the other hand, pressure from a portion of rural producers requesting public financial resources to comply with the minimum rule, that is, to maintain or reforest the minimum reserve area defined by law.” Villain: “PES emerged as an economic incentive for Forest Code compliance, which was precisely for APPs and

² All quotes have been translated from Portuguese by the authors.

			Legal Reserve restoration, which brings low additionality to the instrument. And that's why it was inserted into the law, which is precisely the reward for generating environmental services by private landowners. There are also some issues where there is double counting of these environmental services within the list of environmental services that the new native vegetation protection law brings, an undefined final services, that is, what exactly you are trying to offer, what exactly you are paying for, and low additionality, where you are paying for areas already provided for in the regulation. So, to have high additionality, what will you add beyond what is already provided for?" Hero: "[...] I understand that it is not up to the public budget to pay for mere legal compliance. I have my properties regularized. They have Legal Reserves, they have APPs, everything is fenced. However, I believe that payment cannot be for mere legal compliance. There must be additionality in relation to what is established in the legislation."
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Source: Elaborated by the authors, based on public hearing transcripts (translated from Portuguese).

4.4.4 Moral of the Story

The final legal results demonstrate that the “moral of the story” sustained by the CPDES coalition was successful as rural landowners obtained the benefit of receiving PES for preserving areas such as APPs, Legal Reserves, and Restricted Use Areas—areas that, legally, they would already be obligated to protect, even in the absence of any remuneration. The narrative constructed by the CPDES around PES eligibility in these areas was consolidated in four central argumentative pillars, presented in Table 5 below.

Table 5. Implementation of Law No. 14,119/2021, Article 9, sole paragraph

Narrative	Official Document
“The inclusion of APPs, Legal Reserves, and Restricted Use Areas in PES is essential to ensure economic and environmental sustainability.” “Many landowners lack sufficient technical and financial conditions to carry out these conservation activities on their own.” “APPs and Legal Reserves provide essential environmental services for the collectivity and, therefore, should be remunerated.” “Article 41 of the Forest Code authorizes incentive programs for the maintenance of these areas.”	“Permanent Preservation Areas, Legal Reserves, and other areas under administrative restrictions in accordance with environmental legislation shall be eligible for payment for environmental services using public resources, as regulated, with preference for those located in watersheds considered critical for public water supply, as defined by the competent authority, or in priority areas for biodiversity conservation in areas undergoing desertification or advanced fragmentation.”

Source: Elaborated by the authors, based on public hearing transcripts and Law No. 14,119/2021 (translated from Portuguese).

5. GOVERNANCE, COALITIONS, AND NARRATIVES IN THE PNPSA POLICY PROCESS

Brazil possesses strategic attributes—territorial extent, biodiversity, and water capacity—that make it a central actor in the global environmental agenda. This position is challenged by a domestic context marked by historical disputes between economic growth and environmental protection. Brazilian environmental policy evolved from command-and-control instruments to economic mechanisms and hybrid forms of private self-management, in line with “New Modes of Environmental Governance” (Bäckstrand et al., 2010). However, this transition enabled the expansion of economic interests in defining environmental rules.

The PNPSA formulation reproduces this pattern. Analysis of public hearings reveals a structural representation imbalance—predominance of governmental and business actors and underrepresentation of traditional peoples and social movements—reflecting the asymmetry

of resources and influence among groups. Formal participation did not translate into deliberative power. The pattern of outcomes observed—in which the final policy design closely reflected the positions of the coalition with greater institutional presence and resource endowment, while minority voices left limited traceable impact on the legislation’s trajectory—is more consistent with a legitimization dynamic than a genuinely deliberative one (Avritzer, 2011; Brito et al., 2025). This characterization does not imply that hearings were designed to exclude, but that structural asymmetries in representation and resources systematically constrained the deliberative potential of formally open participation spaces.

Our study demonstrates that the ideal of participatory governance as an inclusive process encounters substantive limits in this case. The “deliberative turn” in Brazilian environmental policy, while discursively anchored in democratic values, reveals a more legitimating than transformative character, especially when unequal representation converts into decision-making asymmetry. The PNPSA exposes the coexistence of a formally plural but substantively concentrated governance system, in which public deliberation is captured by consolidated power structures.

Application of the ACF (Sabatier, 1988; Sabatier & Jenkins-Smith, 1993; Weible et al., 2011) demonstrates that PNPSA formulation was dominated by a coalition with superior political and cognitive resources. This coalition corresponds to the CPDES. Composed of rural landowners, agribusiness entities, NGOs, and governmental actors, this coalition succeeded in reinterpreting central principles of the additionality debate and decisively influencing the legislative outcome.

Coalitions formed around shared empirical beliefs rather than normative values. Both recognized the importance of PES but diverged regarding its purpose: while the CDA advocated payments only for actions exceeding legal obligations, the CPDES reinterpreted the concept, arguing that mandatory preservation itself entailed private costs and public benefits justifying financial compensation.

This interpretation converted “additionality”³ into a notion relative to business as usual, diluting its original meaning of environmental innovation. The CDA, with fewer power

³ Additionality, a concept originating in the Kyoto Protocol for the Clean Development Mechanism (CDM), aims to ensure that greenhouse gas (GHG) reduction projects provide additional mitigation beyond what would occur without these projects. In the payments for environmental services (PES) literature more broadly,

resources, less cohesion, and lower institutional articulation capacity, could not neutralize the dominant narrative. Thus, the ACF applied to the PNPSA reveals how the CPDES's power structure led to policy change—a legal reconfiguration that maintained the stability of power relations in the environmental subsystem under the guise of normative innovation.

Through the NPF (Jones & McBeth, 2010), it was possible to demonstrate the argumentative process through which coalitions mobilize narratives to shape perceptions of justice and efficiency. In the PNPSA case, two antagonistic narratives organized the debate: “Essentiality for the Collectivity”, associated with the CPDES, and “PES Additionality”, linked to the CDA.

The former constructed rural producers as simultaneously victims and heroes: victims for bearing the conservation burden alone and heroes for protecting ecosystems essential to society. The villain was the PES bill that excluded APPs and Legal Reserves from eligibility. The narrative called for “correction of a historical injustice”, transforming a legal obligation into public merit. Meanwhile, the CDA narrative defined providers of additional environmental benefits as heroes and producers seeking remuneration for legal compliance as villains, invoking principles of distributive justice and efficiency in public resource use.

These narratives express different moral conceptions of justice: the CPDES conceives it as compensatory retribution, while the CDA views it as meritorious recognition. Both invoke efficiency but in opposing senses—for the CPDES, efficiency means remunerating all environmental service providers; for the CDA, it means prioritizing actions that generate additional environmental gains.

The NPF proved useful in tracing how these stories became institutionalized. By articulating technical, legal, and moral arguments, the CPDES achieved narrative hegemony and legitimized its proposal before decision-makers and public opinion. The result is the incorporation of its moral story into Law No. 14,119/2021. Mandatory conservation became eligible for payment. From a distributive justice perspective—specifically the principle that public resources should prioritize those least able to self-fund environmental conservation—this outcome can be characterized as regressive, as it primarily benefits established

additionality is treated jointly with conditionality as a defining design criterion (Engel et al., 2008; Wunder, 2005, 2015), and its narrow, efficiency-oriented application has been criticized for overlooking distributive and equity concerns (Muradian et al., 2010; Pascual et al., 2010).

landowners who already hold legal obligations and land titles, rather than traditional communities, smallholders, and other groups with fewer resources and greater socio-environmental vulnerability. In this sense, the PNPSA consolidates a form of environmental justice that remunerates those who already hold land and resources, reinforcing rather than redistributing existing inequalities.

The public circulation of the CPDES narrative extended beyond legislative arenas. Coverage in specialized agricultural media framed the approval of PL 312/2015 as a milestone in the dialogue between agriculture and environmental conservation, with Embrapa researchers describing it as “an advance for the country’s sustainable development” that establishes “alignment between agriculture and the environment” (Delgado, 2019). This media framing reproduced, the same argumentative structure identified in hearing transcripts in the public sphere—legitimizing PES for legally mandated conservation areas as a technical and environmental consensus rather than a contested political outcome. That the dominant coalition’s narrative found resonance in specialized media while critical voices were confined to alternative civil society channels further illustrates the asymmetry of communicative resources between coalitions, reinforcing the representation gap documented in Section 3.1.

This analysis shows that the PNPSA reflects the consolidation of a hybrid environmental governance model in which market instruments coexist with historical inequalities of power and representation. The articulation between dominant coalitions and hegemonic narratives resulted in a policy that, while innovative in form, reproduces structural and symbolic inequalities. Thus, the PNPSA not only institutionalizes PES as an economic instrument but also illustrates how representational asymmetries and narrative dominance, documented throughout this analysis, are consistent with a pattern of political capture that constrains effective democratization of environmental governance in Brazil.

6. FINAL CONSIDERATIONS

This study investigated the formulation of the Brazilian National Policy on Payment for Environmental Services (PNPSA). Through qualitative analysis of legislative documents,

public hearing minutes, and journalistic materials, we sought to understand how coalitions, narratives, and representation gaps shaped the PNPSA's political-institutional process.

First, from the perspective of Brazilian environmental governance, results reveal that the PNPSA fits into a persistent pattern: while there is discourse of broad and democratic participation, the reality is governance marked by symbolic and structural inequalities in representation and decision-making. Brazil's environmental policy subsystem proves vulnerable to the dynamic that Bastos Lima (2021) identifies as the structural power of agribusiness: its capacity to control public institutions and define policy trajectories, endogenizing private agendas under the pretense of public interest. The PNPSA case confirms a pattern consistently documented in the literature—environmental policies that formally espouse social inclusion and valorization of sociobiodiversity operate in practice according to logics that exclude traditional peoples and communities from decision-making processes and from the benefits generated. While the evidence presented does not allow us to conclude that deliberative arenas were deliberately designed to exclude less powerful actors, it strongly suggests that formal participation did not translate into substantive influence for less-resourced groups, and that the final policy design disproportionately reflected the interests of the dominant coalition.

Second, through the lens of the Advocacy Coalition Framework (ACF), the victory of the Pro-Sustainable Economic Development Coalition (CPDES) demonstrates the central role of beliefs, external shocks, strategic policy learning, and institutional mobilization capacity. This coalition succeeded in redefining the concept of additionality, transforming how PES came to be conceived and regulated in the country. Thus, the resulting policy did not imply a rupture with existing power alliances but rather reinforced the prevailing power structure, albeit under a new normative guise.

Notably, some of the most direct critiques of market-based conservation instruments were expressed outside legislative arenas altogether, in channels accessible primarily to already-mobilized civil society actors. The *Grupo Carta de Belém*—a network of social movements, traditional peoples' organizations, and researchers defending territorial and socio-environmental rights—published detailed critical analyses of the PES bill during the legislative process, arguing that PES in APPs and Legal Reserves would transfer the

“environmental debt to poor communities in the Global South” and create risks of external control over Indigenous and peasant territories (Grupo Carta de Belém, 2013). *FASE—Solidariedade e Educação*, another key civil society organization, documented similar concerns, highlighting the risk of territorial dispossession and arguing that the PSA framework reduces communities to mere “service providers”, subordinating their rights and ways of life to market logics (Solidariedade e Educação, 2013, 2014, 2016). Social movements such as the *Movimento dos Pequenos Agricultores* (MPA) and *Via Campesina* proposed alternative frameworks—including the concept of “retribution for the peasant mode of agriculture”—that reframed conservation not as a marketable service but as a collective right deserving structural public support, rather than conditional payments. Indigenous leaders from Acre and southern Amazonas similarly denounced the misuse of PES and REDD resources obtained in their name, with benefits reaching only a minority of communities (Instituto Humanitas Unisinos, 2019). The fact that these voices appeared in alternative media and civil society publications rather than in public hearings is itself evidence of the structural barriers that limited their access to the formal deliberative process—and raises the question, unresolvable with the available data, of whether their absence reflected disengagement or structural inaccessibility. This distinction has significant implications for democratic environmental governance and warrants direct investigation in future research.

Third, informed by the Narrative Policy Framework (NPF), our analysis revealed that narrative construction was decisive in legitimizing and institutionalizing this normative reform. The CPDES imposed a moral narrative that framed producers as heroes of mandatory conservation and articulated a villain—the legal system preventing remuneration—succeeding in incorporating their moral of the story into Law No. 14,119/2021: passive conservation, legally instituted by previous legislation, now becomes eligible for payment. In this way, disputes were not merely about resources or laws but about the “way of seeing” conservation, which symbolically legitimizes the reproduction of inequalities.

Together, these analytical efforts point to a central conclusion: the PNPSA is innovative in form (by instituting a national PES system) but reproductive in substance—it strengthens a pattern of hybrid environmental governance in which market instruments coexist with high power concentration and deficient representation. This finding has important implications for

theory and practice. In the governance and public policy literature, it confirms that market-based environmental instruments are not free from political dynamics of power asymmetry and narrative hegemony. For policy-making practice, it highlights the need for critical attention to effective participation, the definition of what is understood as additionality, and how moral narratives are mobilized to legitimize debatable environmental reforms.

Finally, this study inaugurates three fronts for future research: (i) empirically investigating the PNPSA's actual territorial effects—who is effectively being remunerated? Which environmental impacts have been generated?; (ii) deepening our understanding of participation gaps for traditionally underrepresented actors, especially Indigenous peoples, *quilombola* communities, and settlements—by further exploring how the representation gap unfolds at the local level; and (iii) comparing the Brazilian experience with similar initiatives in other Latin American countries to verify the extent to which the articulation among coalitions, narratives, and the institutional-capture dynamic identified in this case follows a broader or country-specific pattern. We hope this work contributes to strengthening debate on environmental justice and democratic governance in conservation policies in Brazil.

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RESEARCH DATA AVAILABILITY

The entire dataset supporting the results of this study is available upon request to the corresponding author Débora Naidhig. The dataset is not publicly available as it contains unpublished data that may be used in future research.

CONFLICT OF INTEREST

The authors declare that there is no conflict of interest to report.

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