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## BR-319: the perverse role of strategic environmental assessment

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Read the article by Academic [Philip Martin Fearnside](#), published on the *Amazônia Real* website on September 17th:

The licensing of the BR-319 reconstruction project was addressed in an “agreement” between the Ministry of Environment and Climate Change (MMA) and the Ministry of Transport (MT), which provides for the hiring of a firm to carry out a Strategic Environmental Assessment (SEA) of the proposed work [1]. Although an SEA, which would propose governance actions in a 50 km strip on each side of the road, also has an extremely dangerous role by facilitating the approval of the reconstruction project. The impacts of the BR-319 reconstruction are enormous, and are not limited to the strip in question [2, 3].

The licensing of the project awaits a decision from the Brazilian Institute of Environment and Renewable Natural Resources (IBAMA), an agency subordinate to the Ministry of the Environment (MMA). Minister Marina Silva, of the MMA, has stated many times that this decision will be “technical,” without political interference. A worrying event is President Lula's interview on September 9th, where he stated that the BR-319 project “will get off the ground” [4]. The implication is that approval is guaranteed after the SEA is completed, regardless of its content. Announcing this before the content of the SEA is known and before a decision is made is clearly a violation of IBAMA's independence.

In fact, documents like the SEA (Strategic Environmental Assessment) play a very different role in the licensing process than people with little contact with the licensing system think. Basically, whoever writes the document can say whatever they want, for example, that the project in question would be an environmental disaster and should not be done, but even so, the document serves to approve the project. In this case, there are only two boxes to check: the SEA was done, yes, or no. There is no option for “SEA was done, but the project was rejected based on the authors' analysis.” At most, IBAMA, through the contracted firm, would repeatedly return it to the authors for revision until it has a version that provides a public justification for approval.

Past examples where IBAMA analysts themselves issued hundreds of pages of reports showing that projects should not be approved, ended up being approved in the end. The hydroelectric plants on the Madeira River [5, 6], Belo Monte [7-11] and São Manuel [12,

13] stand out.

It is important to recognize the fact that no governance plan declared by MMA, DNIT or President Lula will be able to contain the impact beyond the narrow margin of the highway itself. The Government of Amazonas is free to build the state roads that would connect to BR-319, including AM-366 which would extend 574 km west of the highway. Also, it would not be possible to control the impulse to deforestation in areas already connected to Manaus by road, especially in the State of Roraima [14]. The fishbones from the road that connects Autazes to BR-319 already gives a warning [15].

Including a series of “conditions” in the report does not solve these problems. IBAMA including conditions in the license does not guarantee that they will be met. See the case of Belo Monte [16-18]. How many indigenous lands had the land grabbers and invaders removed? [19].

The argument of proponents of the BR-319 project is always that environmental damage will be controlled by a “governance” program. Unfortunately, even for the first strip along the highway itself, which proponents believe to be the geographical limit of their responsibility, this discourse is false [20]. The working group that DNIT (National Department of Transport Infrastructure) set up considered the BR-319 reconstruction project “environmentally viable” on this basis [21, 22]. The example of “governance” was the BR-163 highway (Santarém-Cuiabá), whose approval based on the BR-163 Sustainable program was followed by the highway becoming one of the biggest hotspots for illegal deforestation, land grabbing, invasion of indigenous lands and other illegalities, even including the organization of the “day of fire” in 2019 [23].

The Environmental Impact Study (EIA) and the governance plan for a 50 km strip from the road to be proposed by the AAE barely scratch the surface of the total impact of the project. Assume that only the federal project is at stake, and not the five state roads to be connected to it, including the AM-366 which would open up the vast Trans-Purus Region [24-26], in addition to facilitating the plan for the enormous “Solimões Sedimentary Area” oil and gas project [27, 28]. The governor of Amazonas considers the project, led by the Russian oil giant Rosneft, a “priority undertaking for the state” [29]. Both the opening of the Trans-Purus region and the new oil and gas fields have enormous climatic consequences, with disastrous impacts on Brazil [30-32]. All this can be expected to happen almost automatically after the BR-319 is rebuilt.

My text on “BR-319 and the Banality of Evil” is very relevant [33]. Although the example Hannah Arendt studied of the “banality of evil” (the Minister of Transport of Nazi Germany) was of an extreme nature, the principle applies strongly to the Brazilian Ministry of Transport and to the other actors in the current case. Each actor, constrained by their role, does not escape responsibility for the broader consequences of their actions. The new “agreement” aimed at licensing the work based on a SEA is a gateway to impact far beyond the area to be targeted by “governance” [1]. As is the case for all actors, scientists cannot think that fulfilling the task of conducting a good SEA is the limit of their responsibility.

*The image that opens this article is from the meeting with Marina Silva, Minister of the*

*Environment and Climate Change of Brazil, and the Minister of Transport, [José Renan](#) Vasconcelos Calheiros Filho (Photo: Marcio Ferreira/MT/23/04/2024).*  
**[Read the full article, with references, on the Amazônia Real website, which is freely accessible.](#)**

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