São Paulo:
Comments Received Regarding the 2018-2020 Design Report

3.2 Multi-stakeholder process throughout action plan development (pg. 10)

São Paulo City Hall:
The City Hall disagrees with the classification "involve". We believe the adequate one would be "Collaborate", and that can be explained by the following reasons.

As it is proven by our meeting minutes, the text of our Action Plan and this IRM report itself, the co-creation process was done on the basis of an extensive and constant dialogue at all steps of the process, and most of the agenda was exclusively set by the public. To the MSF, this dialogue meant a comprehensive number of general and working group meetings (sometimes as much as four times a week), apart from calls, e-mails and whatsapp messages, through all steps of the co-creation process. No changes to the process design could be taken without careful discussion and consideration by representatives both from government and civil society. All meetings were open to public and properly communicated on City Hall and CSOs social media as much as it was possible. These conversations were the base for deciding even specific details such as coffee break menus, workshop facilitation standards and other. To the public, the dialogue meant eleven open workshops in eleven different locations, on different days of the week and different hours in order to reach the greatest number of people from the most different backgrouds. We (all the MSF) even cared about promoting workshops in places that didn't belong to the City Hall, but were locally relevant to the communities. Apart from that, one online consultation and one online voting, also extensively communicated and open to all. Regarding the agenda-setting, nearly all of it was established by the public. Although the City Hall did have the final word on the AP text, it is important to highlight that the themes, the problems discussed within those themes, and the draft text of commitments were 100% decided by the public.

The final text of commitments and milestones were extensively discussed and negotiated with MSF CSOs and even when changes were made in the plan in 2019 that only happened with talk and negotiation (all meeting minutes are available in our website), which ultimately rendered changes in government's initial proposal. That means that the government's proposals ocurred solely whithin an already restriced frame determined by the public and the final commitments were ultimately decided by the MSF. Therefore, government went quite beyond just informing the public of its decisions, it has indeed promoted an inclusive dialogue and worked in an agenda set mostly by the public.

As we understand, the IRM researcher has not provided evidence for the classification affirmed and, in fact, the data presents leads precisely to the conclusion that "Collaborate" is the most adaquate level of public influence for this co-creation process. As such, we believe it is essential to 1) reconsider the classification from "involve" to "collaborate"; and 2) to highlight the criteria used for the decision, for both transparency and improvements for the next co-creation process.

Co-creation and participation recommendations throughout development (pg. 16)

São Paulo City Hall:
It is essential to point out that civil society only was at a numerical disadvantage because one member (Transparência Brasil) did not attend the meeting. Moreover, voting was a common resource for MSF meetings, taking place throughout the process whenever there was no consensus.

São Paulo City Hall:
It is important to highlight that before the changes took place, the government had heard from Jardim Lapenna and others' experiences and had made a research with public servants and legislation in order to understand if this would be feasible.

In a first scenario, in which the City Hall would create and implement the Plans (that was what the commitment stated), resources and staff would clearly be insufficient. On average, Neighbourhood Plan processes required 3+ nearly-full-time staff and were expected to last at least two years until the publication of the plan. In rough conservative estimates (based on the likely size of neighbourhoods), São Paulo would have at least 1,200 of them. As the commitment previously stated "Create and implement the Neighbourhood Plans", this would mean the city hall would have to guarantee unprecedented resources and staff for these tasks, making it impossible. This was presented to CSO during MSF and commitment two meetings, and, in our perspective, they did not present clear and feasible alternatives to this situation. The City Hall could not commit itself to implement a task it was 100% sure it could not implement.

In a second scenario, the creation of neighbourhood plans would be carried out by local neighbourhood associations and councils (as is the legal determination of articles 347 and 348 of the Plano Diretor Estratégico/ Law 16.050/2014) and approved by the participatory municipal Councils (Conselhos Participativos Municipais, which have 100% civil society representation). This would mean, according to the former commitment text, that the City Hall would have to enforce that all neighbourhoods (again, possibly more than 1,200) would organize themselves to establish all complex methodologies and processes needed to formulate their plans and also guarantee that each CPM would analyze their plans. That would also require unprecedented staff and resources.

Jardim Lapenna is a great case study. But as all case studies, it was made possible due to a combination of factors. For instance, academia and civil society were actively supporting (in hours of work) the neighbourhood plan. To state that because Jardim Lapenna was sucessful, Neighbourhood Plans in general are feasible, is to dismiss the special conditions in which the

development took place. We are currently looking into how this example can be expanded for other regions and it will be essencial that the actors involved collaborate to understand how we can replicate this sucessful project.

Commitment 2. Decentralization and local development: Context and Objectives (pg. 25)

São Paulo City Hall:
We believe that it would be better to use the term "Subprefectures Action Plans", so that is not confused with "Regional Plans", which are another planning instrument which was already formulated in 2016.

(pg. 26)
São Paulo City Hall:
Again, as mentioned in a previous comment, the City Hall has analysed the possibilities for implementing the milestone related to neighbourhood plans but has found no viable option for it. Moreover, the CSOs from the MSF did not present any alternative for making that possible. We believe that is the case precisely because there is no consensus on how these Neighbourhood plans could be created, since the few examples we have (including Jardim Lapenna), despite being greatly made, are not replicable for financial and staff limitations. There is no disagreement on the relevance of neighbourhoods in policy making and urban planning, there is an imperative limitation on how this can be reached. We believe that if this government opinion is not highlighted the reader could be lead to a biased comprehension of the discussion.

Annex I. Overview of São Paulo performance throughout action plan development (pg. 44)
São Paulo City Hall:
We believe that the evaluation on this point should be "green". At that moment, all those informations about the MSF were avaiable to the public.