

Comments by the Federative Republic of Brazil on the Habitat III Policy Papers

The following comments on Habitat III Policy Papers comprise analyses made by 14 Ministries at federal level, as well as by states and municipalities. We applaud the efforts made by the policy units to identify challenges, policy priorities and key actions at all levels of implementation, especially in light of the complexity and intersectoriality of the issues under discussion. Nevertheless, in the elaboration of the final documents, Brazil believes that it is important to achieve a fine balance between further refining the multisectoral analyses on one hand, and avoiding repetition in and between documents on the other. This endeavor is an important step in the process of obtaining a "concise, focused, forward-looking and action-oriented outcome document" in Habitat III, as decided by the General Assembly in Resolution 67/216.

1 – The Right to the City and Cities for all

Positive aspects: issues presented in the paper that are considered of particular importance and/or should be maintained	<ul style="list-style-type: none">• The recognition of the Right to the City as the heart of the New Urban Agenda, reaffirming the “necessary link between social inclusion, participatory democracy, and human rights with the territory to make inclusive, fair, democratic and sustainable cities” (p. 2).• The recognition that all persons who inhabit a city (in its urban, rural or semi-rural spaces), whether permanently or transitionally, must be considered its citizens and, thus, be able to enjoy their rights and have access to public spaces, basic services, and community facilities.• The importance of guaranteeing the right to social participation (institutionalized or not), with clearly defined rules and roles and recognizing the city as a space of debate and conflict; and, similarly, the need of participatory urban planning and management, based on capacity-building and empowerment of society to effectively influence decision-making processes, reflecting the governance principles of accessibility, transparency and inclusiveness. Furthermore, the importance of women as agents in the planning and decision-making processes of urban policies.• The understanding of the physical space of the city as encompassing the surrounding rural area and its natural
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resources, in addition to the urban space. This understanding is crucial in order to promote the necessary debate on overcoming the urban-rural divide, which contributes to the neglect and exclusion of rural areas and its actors, in particular the most vulnerable social groups, such as indigenous and quilombola communities.

- The approach on the dichotomy between growth and wellbeing, with focus on the formulation and implementation of development strategies that prioritize human wellbeing in face of territorial and economic changes, as well as the emphasis on solutions to fight poverty and guarantee means of subsistence to all.
- The need for mechanisms aimed at strengthening urban identity, culture and heritage.
- The need to ensure the use of public space as a place of development of legal economic activities and income generation; the recognition of decent work as a central concept for the achievement of inclusive cities, and the importance of formal and solidarity economies to foster businesses in the cities.
- The fact that discussions on mobility encompass the organization of city functions and the importance of spatial planning, including the promotion of the mix of use and income in the territory and polycentricity, reducing the need for motorized displacement. Furthermore, mobility solutions presented in the paper adequately emphasize the improvement of public transport and non-motorized modes of transportation instead of large road infrastructure projects.
- The focus on mixed-uses of urban space, intensive use of urban infrastructure, design of spaces for public use and the need to plan the city under concepts of resilience and sustainability, considering the organization of the urban space, building typologies, modes of transport, environmental protection, among others forms of planning and management of urban daily life.
- The importance of the social function of land and the right to adequate housing in addressing the right to the city and cities for all, especially the need of guaranteeing the social function of land through mechanisms that manage land value.
- The proposals for decommodification of the urban space and the discussion of mechanisms related to the fair distribution of burdens and benefits associated with the urbanization process, including the search for solutions to avoid the displacement of local residents (gentrification) in large urban projects, as well as projects implemented via public-private partnerships with large companies.
- The importance of promoting a balance between fostering the development of metropolitan areas and medium and small-sized cities, as well as the need to promote development strategies for local development of small and medium-sized municipalities to curb urban concentration in mega cities.
- The need to develop specific employment policies for young people, as well as the need to guarantee the

	<p>safety and quality of the public spaces, particularly free of violence against women and youth.</p> <ul style="list-style-type: none"> • The importance of addressing the environmental aspects of air quality and noise pollution, which reflects in human health and greater governmental expenses, due to the increased need for hospital care, hospitalizations and the use of medicines. Poor air quality is correlated to the effects of morbidity and mortality caused by respiratory problems and cardiovascular disease.
<p>Omissions: relevant issues that were not addressed in the document</p>	<ul style="list-style-type: none"> • The text focuses on recommendations and priorities for women, immigrants, refugees and IDPs, leaving several other vulnerable groups underrepresented, such as the youth, older persons, persons with disabilities, children and LGBT persons, as well as persons discriminated by race, ethnicity or religion. The paper could also profit from discussing the urban insertion of groups affected by multiple vulnerabilities – such, in the case of Brazil, as the black youth. <ul style="list-style-type: none"> - Particularly, the issue of accessibility for older persons and persons with disabilities was not duly contemplated in the document. Removing barriers to the full use of the city is an important component of the right to the city and should be given greater consideration in the elaboration of a New Urban Agenda. In this context, the design of a city for all must aim at guaranteeing autonomy to older persons, as well as to people with various permanent or temporary disabilities (such as reduced mobility, vision and hearing impairment, among others). The design of public parks and spaces and community facilities must encompass mechanisms and technologies that allow the inclusion of people with autonomy, enabling them to exercise their right of moving around the city and, thus, creating more friendly spaces. - Furthermore, the paper should have a more cross-cutting perspective on the youth, addressing the need to introduce specific policies and rights to increase the autonomy of young people, as well as the leadership role that can be played by young persons or groups. • The paper should address the right to land, particularly the right to urban land, among the policy priorities and critical issues for implementation of a New Urban Agenda; and expand the concept of social function of property beyond the notions of housing production and control of the private use of space as a way to promote inclusion. In parallel to the social function of property, the broader concepts of social function of the city and public space should also be introduced. In this context, it is important to highlight that the current approach to property hinders the implementation of resilience and environmental measures. • As regards identity, culture and heritage, the following points should be taken into consideration in the elaboration of the final document:

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| | <ul style="list-style-type: none">- The UNESCO Convention on Cultural Diversity (2005) provides the framework to numerous issues discussed in the paper, such as the sections "Social aspects: Rights to safety, security and well-being" and "Identity, culture and heritage", as well as to the reference in Policy Paper 2 to culture and heritage" as a driver and an enabler of sustainable urban development", vision enshrined in the more recent documents produced by UNESCO. The 2005 Convention could be further explored in the policy papers, along with the Convention Concerning the Protection of the World Cultural and Natural Heritage (1972) and the Convention for the Safeguarding of the Intangible Cultural Heritage (2003), by providing a way to overcome dualities, such as the opposition between "preservation" and "destruction", and "greeds" and "needs".- It is also important to recognize and preserve the landscape heritage (hills, mountains, volcanoes, rivers) as geographic features of people's identity. Conurbation processes and increasing urban density may lead to the loss of cities' landscapes which are considered icons and identity elements of people with their territory. In this context, it is important to take into consideration geographic elements that are understood as references of the natural site in which the anthropogenic structure is inserted.- Similarly, it is important to recognize and preserve urban centers and historical paths. Some cities contain perimeters whose urban design are intrinsically related to their historical formation and, thus, should be maintained regardless of having relevant buildings. By the same token, there are cities' highways and routes that were important avenues for shaping the urban fabric and, for this reason, must be preserved and highlighted so the population becomes familiar with the city's history.- It is also important to further develop the role of the State in protecting the collective heritage, given that the right to the city is made possible by the fulfillment of the social function of both private and public property.• The right to adequate food, which was not addressed in the paper, should be considered in the context of the right to the city. This implies not only a concern for ensuring food security, but also the need to plan urban space so that it does not form an obesogenic environment. It is important to develop public actions and policies that encourage urban dwellers (especially the poorest) to adopt a physically active non-sedentary life routine and avoid ingesting a diet high in processed foods and with high levels of sodium and fat, because of the poor conditions in the daily routine, such as urban mobility bottlenecks, precarious working environments, lack of public leisure and sports facilities. The consumption of healthy foods, including the support of breastfeeding in different urban environments, the regulation of marketing, advertising and commercial |
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	<p>promotion of food and beverage should be encouraged as mean to avoid non-communicable diseases.</p> <ul style="list-style-type: none"> • Considering the urban-rural continuum, it is necessary to bear in mind the situation of family farmers, who must also be able to fully exercise the right to the city. Family farmers are indispensable actors in breaking the obesogenic cycle described above and in combating poverty, hunger and social inequality. The possibility of promoting the procurement of family farming products as inducing a more sustainable and healthy urban environment should be discussed in the policy papers. The purchase of local food from family farms and local producers generates income for the city and offers the possibility of food that is sustainable, organic, agro-ecological, healthy and culturally identified with its residents. Furthermore, it is fundamental to value the traditional feeding practices and regional culinary preparations that stress the consumption of fresh and minimally processed food. Finally, the paper should also address the existence of food deserts, <i>i.e.</i>, urban areas in which large population groups, primarily low-income, do not have accessible supply of varied and fresh food near their homes.
<p>Negative aspects: approaches considered inconsistent with best practices in the area</p>	<ul style="list-style-type: none"> • In general terms, Brazil does not believe that stimulating a single compact, dense city model is ideal in all cases. It is necessary to recognize different forms of occupation (more or less dense), related to the characteristics of populations and territories, and protect and encourage their maintenance as a sustainable development strategy. <ul style="list-style-type: none"> - In this respect, it is important to emphasize that there is no single universal model of compact city and the universal restriction on urban expansion as a way to promote more inclusive cities is not applicable to the reality of developing countries. In order to promote inclusive cities, the objectives to be pursued in urban planning must be, rather than restricting the growth of urban areas, the balanced distribution of people and activities in the territory –understood as the balance between housing supply and the provision of jobs, infrastructure and urban services–, in order to reduce the need of displacement. Therefore, it is more appropriate to plan urban expansion than to restrict it, as well as to promote the efficient use of space primarily by tackling urban voids and adequately planning the territorial distribution of activities. - In this context, it is crucial to determine urban indices of occupancy that are compatible with the territory's bearing capacity to control urban sprawl, as well as the building and population densification of the city fabric. The portions of a city's territory present differences regarding soil characteristics, the presence of historical buildings, quality of infrastructure, social configuration, among other features. The regulation of land parceling, occupation and use should be made according to the bearing capacity of each land portion, which indicates the propensity for densification of each site and the need for preservation of relevant

environmental or cultural attributes.

- As far as more specific issues are concerned, the following approaches are considered inconsistent with best practices in the area:
 - On page 6, it is stated that the social mix approach to improving existing and/or developing new neighborhoods are criticized for destroying rather than helping existing communities, and for not achieving social interaction in new developments. Brazil believes that, if skillfully constructed, these strategies may increase dwellers' empathy and tolerance.
 - On page 17, instead of deterring "the development of mega-projects and sporting events that displace the urban poor", the paper should focus on ways of ensuring that the development of mega-projects and sporting events offer new inclusion opportunities for the low-income population.
 - On page 33, item 5.5, regarding the assertion "Replace bio-mass consumption with cleaner energy alternatives", it should be highlighted that it is necessary to differentiate the use of traditional biomass (for example, derived from deforestation), from the use of organic forms of biomass (as occurs, for instance, in the production of the Brazilian ethanol). The International Renewable Energy Agency (IRENA) includes bioenergy in the list of sources considered renewable, and the International Energy Agency (IEA) includes some forms of biomass among the most common sources of renewable energy. Therefore, the phrase makes a general and incorrect analysis on the use of biomass as an energy source. In Brazil, sources like sugar cane bagasse are low-emission alternatives, especially when associated with the production of biofuels. In this context, the sentence could be replaced by a reference to the need of advancing the consumption of clean energy alternatives or to replace traditional biomass consumption with cleaner energy alternatives, including other forms of biomass.
 - The text affirms the need to recognize that urbanization in developing countries is characterized by growth in urban informal economies (understood as informal land occupation and informal economic activities). Nevertheless, as regards the case of Brazil, for example, it is important to bear in mind that several efforts have been made in the last 20 years to overcome that legacy and to promote sustainable urban development and inclusive and ordered occupation of cities, ranging from the approval of regulatory frameworks such as the Statute of the City to the implementation of programs involving large investments in urban development and social inclusion, such as the Growth Acceleration Program and the My House, My Life Program, in addition to policies of productive inclusion and fight against poverty. Therefore, it is important to be careful with the reproduction of assessments that do not apply correctly to the current context of Latin America,

	and Brazil in particular.
<p>Information that needs to be corrected and/or updated</p>	<ul style="list-style-type: none"> • When referring to people with disabilities and/or reduced mobility, it is preferable to use the expression "persons with disabilities" instead of the term "handicapped", which has pejorative connotations. • On page 3, paragraph 4, the text in brackets should be suppressed, given that the list provided is non-exhaustive and since the mentioned groups are included in the concept of "marginalized groups and people living under vulnerable conditions". • On page 3, third paragraph of section 3; there is a reference to the sustainable management of "commons", which includes, among others, the so-called "energy assets". It should be highlighted that the expression is not commonly used in the context of expert debate on the matter and there is no internationally agreed definition on this terminology. As inserted, it could give rise to questions about the ownership of resources, goods, equipment and facilities related to the energy sector. For these reasons, it would seem appropriate to delete it from the text. • On page 6, item 1.1, it is important to add that gentrification sometimes also implies a decrease of health and life quality of the residents of the affected areas, as far as the spaces are reconfigured in order to minimize the access to public equipment that promote health, such as plazas, parks, public sporting facilities etc. • On page 6, the expression “food security” should be replaced by “sustainable food systems”, terminology agreed in the Framework for Action at the Second International Conference on Nutrition (ICN2). http://www.fao.org/3/a-mm215e.pdf. • On page 8, the sentence "It is necessary to improve the accessibility to infrastructure, particularly in the transport and public spaces realms" should be replaced by “It is necessary to improve accessibility to destinations and public spaces, through access to transport systems.”, which incorporates the language used in the Declaration of Brasilia, adopted at the Second Global High-Level Conference on Road Safety: http://www.who.int/violence_injury_prevention/road_traffic/Final_Brasilia_declaration_EN.pdf?ua=1. • On page 8, the sentence “There is a need to increase private/public alternatives. There is a need to develop safe and regular transport, to guarantee access to employment, education, health and economic development” should be replaced by “There is a need to foster public transportation and other sustainable transport modes, such as walking and cycling, and well as intermodality. There is a need to develop safe, affordable, accessible and sustainable transport systems for all, to guarantee access to employment, education, health and economic development”, which is based on PP11 of the Declaration of Brasilia.

- Also on page 8, item 1.5, it is important that the discussion on urban mobility also considers the positive impact that public policies oriented to the use of non-motorized vehicles and walking have in preventing diseases and disorders (especially the cardio-cerebro-vascular diseases, the leading cause of deaths the world).
- On page 14, item 4.1, it is worth mentioning the public facilities that impact human health which depends on the preservation or conservation of natural resources, such as parks and squares.
- On page 14, the item “Increase of public violence against women” should be replaced by “Increase of gender based violence”, since the concept of public violence is unclear.
- On page 16, item 5.4, "Energy consumption", there is the use of the expression "energy poverty". Although it seems to relate to the typical approach of multidimensional poverty –in which two of the eighteen components refer, in fact, to energy– there would be a preference for using alternative terminology with a focus on access to energy. The current expression could lead to misleading conclusions regarding the availability of energy resources in a city, region or country.
- On page 22, the sentence “The women need the support of the government with the implementation of laws to protect them from different kind of violence” should be replaced by “Vulnerable groups, especially women and girls, need the support of the government with the implementation of laws, policies and plans of action to protect them from different kinds of violence”.
- Also on page 22, the following changes should be made:
 - “To promote the expansion of public transport over private” should be replaced by “to promote the expansion of public transport”;
 - In “To assure public transport that is affordable, secure and free from violence for women and children”, the word “secure” should be replaced by “safe”; and
 - The sentence “To recognize and promote diverse modes of mobility, pedestrian, public transportation, bicycles, and cars” should be replaced by “To recognize and promote sustainable modes of mobility, such as public transportation, walking and cycling”.
- On page 23, under the topic 1.8, entitled "Cultural practice, identity and heritage", there is a reference to recognizing culture as the fourth pillar of sustainable development. Even though culture is an important element in the debates on sustainable development, it is not among the three pillars of the Sustainable Development Goals (*i.e.* environmental, social and economic pillars), which resulted from a long negotiation process between the members of the United Nations.
- On page 32, item 5.4, given that the concept of "mitigation" in the climate regime is associated with the

	<p>reduction of emissions of greenhouse gases, the words "mitigate" and "mitigation" should be replaced by "reduce" and "reduction" in the following sentences "To recognize and mitigate eminent risk in coastal cities due to rising sea level. The way how the mitigation is possible will be the starting of a resilient process to prevent disasters with the application of a methodology to implement in the vulnerable communities.</p> <ul style="list-style-type: none"> • The above rationale also applies to the language used in the sentence "To recognize and promote the role of green infrastructure in mitigating disasters", on page 33. The words "green" and "mitigating" could be replaced by "resilient" and "preventing" respectively.
<p>General comments</p>	<ul style="list-style-type: none"> • In general terms, the text has a thorough and comprehensive approach on the topics under analysis and is compatible with Brazilian guidelines for social and urban policies. Nevertheless, it is important to highlight that the document, besides being rather repetitive, addresses an excessive number of issues – which, despite being vital for urban development, were already covered in other more specific papers. This approach can lead to an emptying of the discussion of the Right to the City as a driving force of inclusive urban development. Therefore, in the final version of the document, it is important to try to avoid repetition and concentrate on the core issues of the Right to the City. • Although the policy paper addresses problems and difficulties that hinder the enjoyment of human rights in many modern-day cities, it is worth noting that it sometimes uses a too generalizing language, which could be better seen in context, given the efforts of various local and national governments, including Brazil, towards the realization of those rights. For instance, this kind of approach may be observed on page 2, "The current urban development model has proven to fail in granting urban dwellers a good life. On the contrary, this model fosters financial profit and the commodification of the city to the benefit of a financial oligarchy and at the expense of the majority of the population", and on page 19, "Despite the population demonstrated with examples that solve the housing problem in construction for the poor. The government does not recognise these practices and the budget for housing is going to the middle class." • As reported in a footnote in its introduction, the paper does not have an "implementation" section. The inclusion of this section in the final version of the document would be important to more easily distinguish what the policy unit considered to be the political priorities and recommendations for future action on the topics discussed.
<p>Specific comments</p>	<ul style="list-style-type: none"> • Regarding the decommodification of space, it is crucial to acknowledge that the great challenge to break the vicious circle of speculation and broaden land access opportunities for the poorest population is counteracting the effects of the unequal distribution of infrastructure in the territory, which is how the presence of

infrastructure becomes a major factor in the formation of land prices. In this context, it is necessary to strengthen the universalization of infrastructure and urban services to increase the supply of adequate land at fair prices.

- The right to the city relates to the need of examining how supply, access and deficits are distributed and present in the territory in order to adapt them to the needs of society.
- As regards the promotion of safe cities, it is important to reinforce the need to develop intangible actions such as increasing the self-esteem of the population that lives in poorer neighborhoods (fighting territorial stigmatization) and strengthening neighborhood ties. Furthermore, it is important to improve (via investment and regulation) the quality of urban spaces by tackling urban voids, valuing and upgrading public spaces and spaces of coexistence, and promoting mixed-uses, active façades and urban control.
- The paper should deepen the discussion on inclusive strategies of zoning for social inclusion of the poorest population and integration of informal and precarious settlements in the urban fabric.
- It should also be noted that the document includes among its priorities, recommendations of actions on matters that are not fully under the competence of the executive and legislative branches, such as "ensure that the judiciary supports the ability of individuals and communities to challenge forced evictions". Even though those powers may create legislation, including rules of procedural law on human rights and urban development, it does not seem to be possible to guarantee that the judiciary will support individual claims in the matter as suggested by the document; therefore, it would be more appropriate to use language that promotes the right of access to justice.
- Regarding environmental aspects of the document, it is important to ensure the universalization of water supply as a right to all urban dwellers, in sufficient quantity and adequate quality; to prevent and minimize contamination of water supply sources and to set performance goals of water treatment processes for removal of chemical and microbiological contaminants.
- On pages 3 and 4 of document (item 3 - The Right to the City to the Heart of the New Urban Agenda) the elements that should constitute the New Urban Agenda are discussed. Brazil suggests the incorporation of "universal access to health" among these elements.
- On page 14, the actions on violence should be given more attention and highlighted in a separate item within Social Aspects. Moreover, the text should contemplate violence against children, given that 25% of children experience physical violence, and 36% emotional violence (see Draft global plan of action on violence, figure 1, available at: http://apps.who.int/gb/ebwha/pdf_files/EB138/B138_9-en.pdf).

	<ul style="list-style-type: none"> • On page 23, sub-item "to promote social infrastructure and public facilities and services particularly in low-income neighborhoods", the final document could make a reference to the need of integrating public records and social databases, which has the potential to leverage the impact of social policies and the public facilities by which they are supported, such as the Brazilian Single Registry for Social Programs ("<i>Cadastro Único</i>"). • On page 31, item 5.1, entitled "Air quality and noise pollution", there is reference in the first and sixth topics to the need to encourage vehicles using clean energy. Although the plain mention of "clean energy vehicles" does not imply in itself discriminatory bias, the inclusion of an express reference to sustainable biofuels as an example of "clean energy" to be encouraged in urban transport would be positive. The increased use of vehicles running on biofuels in urban transport currently depends more on public policy incentives than technological development, as opposed to other options, such as electric vehicles, which still require a technological leap-forward development in order to lower the costs involved. Given that it is the viable solution in the short term, it is fit to have an express reference to it. • On page 33, item 5.5, "Energy consumption", third point, the reference to "Set bench marks to reduce and eliminate fossil fuel consumption" should be deleted. Despite the commendable efforts undertaken by various countries to promote greater use of renewable sources, it does not seem appropriate at this time to establish specific targets in this matter at the present forum.
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2 – Socio-Cultural Urban Framework

<p>Positive aspects: issues presented in the paper that are considered of particular importance and/or should be maintained</p>	<ul style="list-style-type: none"> • The very existence of an urban framework that highlights cultural and social issues is a positive aspect. In the central messages of the document, the emphasis on social innovation, which may also be understood as "citizen innovation", in urban planning and management is a positive point that should be maintained. • The same applies to the emphasis on the promotion of localized systems of sustainable urban development through participatory processes, which should be kept as a general guideline to the paper, along with promoting social, economic and cultural inclusion, respecting diversity and cultural values, increasing urban safety, and developing sustainable urban settlements. • The recognition of cities as places of cultural production is also of extreme importance. In this context, Brazil supports the point of anchoring the socio-cultural urban framework in the narrative of the "Right to the City"
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	<p>(page 10), which may also be understood as a cultural right. Culture is an important dimension of sustainable urban development and may play an important part in the success of the New Urban Agenda, given its role in the activation of public spaces and in the promotion of a sense of fellowship and belonging between urban dwellers – which in turn may give rise to a virtuous process of material and immaterial enrichment of cities.</p> <ul style="list-style-type: none"> • The linkage between migration and urban issues should also be maintained in the final document.
<p>Omissions: relevant issues that were not addressed in the document</p>	<ul style="list-style-type: none"> • The need for maintaining or creating large urban spaces for public events should be discussed in the paper. Cities, especially the most populous, sometimes lack space for large gatherings of people. Squares and parks are important to enable and disseminate cultural, artistic and religious practices to large numbers of urban dwellers and allow them to keep their traditions and create new forms of manifestations of urban culture. • The document should emphasize the importance of the democratization of communication, as well as the appreciation of the various means of community communication, independent and peer to peer, especially in light of the fact that the media often contributes to the stigmatization of certain social groups and the feeling of fear and insecurity among citizens. • In addition to protecting cultural diversity, the paper should address ways to promote the diverse cultural dynamics of cities and the incorporation of citizens' innovations and creations in the economy, encouraging micro and small cultural producers with public and private incentives. • As observed in the commentaries to Policy Paper 1, the UNESCO Convention on Cultural Diversity (2005) provides the framework to numerous issues discussed in the policy papers, such as the sections "Social aspects: Rights to safety, security and well-being" and "Identity, culture and heritage" of Policy Paper 1, as well as to the reference in Policy Paper 2 to culture and heritage "as a driver and an enabler of sustainable urban development", vision enshrined in the more recent documents produced by UNESCO. The 2005 Convention could be further explored in the policy papers, along with the Convention Concerning the Protection of the World Cultural and Natural Heritage (1972) and the Convention for the Safeguarding of the Intangible Cultural Heritage (2003).
<p>Negative aspects: approaches considered inconsistent with best</p>	<ul style="list-style-type: none"> • As observed in the commentaries to Policy Paper 1, the text focuses on recommendations and priorities for women, migrants, refugees and IDPs, leaving several other vulnerable groups underrepresented, such as the youth, older persons, persons with disabilities, children and LGBT persons, as well as persons discriminated against by race, religion or ethnicity. The paper could also profit from discussing the urban insertion of groups affected by multiple vulnerabilities – such as, in the case of Brazil, the black youth. • Some of the recommended actions are related to the creation of new government institutions or NGOs.

practices in the area	However, it is also important to address strengthening and building capacity of existing institutions.
Information that needs to be corrected and/or updated	<ul style="list-style-type: none"> • On page 6, the expression “health including sexual and reproductive health” should be replaced by “health including sexual and reproductive health and rights”. • Also on page 6, the term “nutritious food” should be replaced by “food security and nutrition”, incorporating the language of Recommendation 3 of the Framework for Action of the Second International Conference on Nutrition (ICN2), available at http://www.fao.org/3/a-mm215e.pdf (Recommendation 3: Strengthen and establish, as appropriate, national cross-government, intersector, multi-stakeholder mechanisms for food security and nutrition to oversee implementation of policies, strategies, programmes and other investments in nutrition. Such platforms may be needed at various levels, with robust safeguards against abuse and conflicts of interest).
General comments	<ul style="list-style-type: none"> • The approach on the topics is consistent with Brazil's national policies. However, the text is rather repetitive and does not offer a deep analysis of the addressed issues, impairing a thorough and complex understanding of the topics under discussion. The presentation of best practices and lessons learned can be an interesting way to further develop the subject and confirm the effectiveness of recommendations. • Although the policy paper addresses problems and difficulties that hinder the enjoyment of human rights in many modern-day cities, it is worth noting that it sometimes uses a too generalizing language, which could be better seen in context, given the efforts of various local and national governments including Brazil, towards the realization of those rights. This may be observed, for instance, on page 14, "One cannot exclude the responsibilities of the national government but one has to redirect dualism and exclusion and modify the neoliberal model."
Specific comments	<ul style="list-style-type: none"> • Regarding the inclusion of migrants and refugees, it is important to highlight the role local governments may play in the mobilization of the private sector and civil society. • It is worth noting that the issues discussed in the paper are also related to tourism, in light of the premise that, in order to meet the needs of a tourist, a city must first and foremost meet the needs of the local community. Particularly, the tackling of socio-cultural issues and the social inclusion of groups in marginalized or vulnerable situations have important positive effects on the sustainable development of tourism. • In the elaboration of inclusive urban policies, it is important to consider that many small social mobilization processes have the potential to catalyze major changes, such as sports, culture and education. In this context, Governments should consider the inclusion of the right to participate and transform the city (and the

	<p>place/country) in school education.</p> <ul style="list-style-type: none"> • The conservation of cities' immaterial heritage (p. 10) should be further developed in the paper. In this context, encouraging the exchange of experiences and practices of coexistence based on orality, and the appreciation of the different traditions as a common good, may increase the meeting and respect between urban dwellers and stimulate the creation and expansion of local and regional networks, stimulating the sense of belonging.
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4 - Urban Governance, Capacity and Institutional Development

<p>Positive aspects: issues presented in the paper that are considered of particular importance and/or should be maintained</p>	<ul style="list-style-type: none"> • The importance of including communities in decision-making processes, with emphasis on the promotion of participation, equity, inclusion and capacity building through new laws or review of existing legislation, providing new approaches to the urban governance process. • The need for vertical and horizontal cooperation between national and supranational governments. • The emphasis on the metropolitan question. • The need to establish urban-rural cooperation. • The importance of reinforcing local governments through economic coordination and institutional development, especially by strengthening technical personnel. • The need to ensure appropriate and sufficient resources to implement policies, both through tax revenues and public-private partnerships, as well as through funding and access to national resources. • The need for transparency and control of public accounts.
<p>Omissions: relevant issues that were not addressed in the document</p>	<ul style="list-style-type: none"> • The suggestion of indicators and forms of monitoring is a positive aspect and should be maintained, but some of the proposed indicators are unclear and need to be further detailed. • Even though there is a good emphasis on the metropolitan question, when addressing the challenges of metropolitan governance, little attention is devoted to the financing of metropolitan areas, as well as the need to promote multi-level and multi-stakeholders governance capacity, which is crucial to advance in the provision of well-integrated policies and services. In this regard, the topic "3b. Analyze financial resources required and instruments for their sustainability" should address the issues of "Metropolitan Governance" and "Participation and equity", as was done in the other topics.

<p>Negative aspects: approaches considered inconsistent with best practices in the area</p>	<ul style="list-style-type: none"> • The proposed indicator "the percentage of the urban population living in slums" should be removed, since there are several urbanized slums that provide adequate infrastructure. By the same token, the most appropriate indicators relate to the measurement of access to public services, security of tenure and infrastructure – which are already considered in other proposed indicators. • The creation of federal states/provinces that reflect metropolitan boundaries (p. 13) cannot be considered a factor of urban governance success or institutional capacity, given the existence of growing/expanding metropolitan areas, which thwarts the creation of states or provinces with changing borders. • The target of increasing the share of budgets managed by local governments (p. 15) disregards the fact that this share is already significant in countries with tradition of municipal autonomy. This goal should be replaced by the target of guaranteeing a percentage in the sharing of resources that is proportional and appropriate to the local government's duties and responsibilities. • It is important to consider that the implementation of key actions 1 and 3 (p. 19: local law review, territorial cohesion and financing of subnational governments) also relies heavily on states/provinces and should not be attributed exclusively to national governments. Likewise, the implementation of key actions 5 and 6 (transparency and new technologies in urban and territorial management) may involve purely local responsibility, and not shared responsibilities between local governments and the national government, as suggested in the document. • The indicator "the convergence of voting patterns in metropolitan regions" (p. 21) should also be suppressed, given that electoral discrepancies are the result of the democratic process and occur even between neighborhoods and districts of the same municipality. Thus, it may also occur between different locations in the same metropolitan area. • On page 7, as regards the affirmation “Demographic change and ageing societies will lead to greater risks of isolation within metropolitan regions and put additional pressures on cost effectiveness of key services (above all health)”, the expression “above all health” should be suppressed. What should be emphasized is the universal access to health that guarantees health care for all, throughout life, combined with other protection policies and social inclusion of this aging population, so that they can contribute positively to society. Healthy ageing is not just the absence of illness, but the maintenance of functional ability. According the World Report on Ageing and Health: “[r]ather than portraying expenditures on older people as a cost, these are considered as investments that enable the well-being and various contributions of older people. These investments include expenditures on health systems, long-term care and on enabling environments more broadly. The return on
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	<p>some of these investments is obvious (for example, better health from appropriate investment in health systems leads to increased participation in society). Others may be less direct and less obvious but require equal consideration: for example, investment in long-term care will not only benefit older people who have significant losses of capacity but can also allow women to remain in the workforce instead of at home caring for older relatives; the availability of long-term care may also foster social cohesion by sharing risk across the community" (p. 17, http://apps.who.int/iris/bitstream/10665/186463/1/9789240694811_eng.pdf?ua=1).</p>
<p>Additional comments</p>	<ul style="list-style-type: none"> • The identification of common external factors favorable to the success of policy priorities should be highlighted as a general positive aspect, especially "crisis as opportunity or big flagship events (Barcelona vs. Athens in the case of Olympics)." The importance and impact of mega-events should be emphasized, not only at metropolitan level, but also at other levels and cities. • Vertical, horizontal and cross-sectoral cooperation should be added to the list of criteria for identifying policy priorities (p. 10). • The text affirms that urban-rural collaboration is a vital challenge for metropolitan governance. It is important to bear in mind that this cooperation should take place between any level of cities, not only at metropolitan level.

5 – Municipal Finance and Local Fiscal Systems

<p>Positive aspects: issues presented in the paper that are considered of particular importance and/or should be maintained</p>	<ul style="list-style-type: none"> • The importance of applying resources to reduce inequality and promote human rights. • The importance of strengthening transparency: relationship between tax obligations, public spending and the social return of expenditures. • The need to structure public spending according to the real needs of the population, including the importance of participatory budgeting strategies. • The need to create new forms of financing climate change response strategies. • The need to develop financial and institutional modalities for metropolitan areas. • The importance of legal and institutional frameworks required for effective local collection of own-source revenue, as well as the need to expand local capacity of indebtedness and fiscal management. • The importance of strengthening municipalities' financing strategies, including the capture of land valuation.
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<p>Omissions: relevant issues that were not addressed in the document</p>	<ul style="list-style-type: none"> • The paper could deepen the discussion on the special financing challenges faced by small municipalities. • Funding for urban services and infrastructure with private sector participation was not fully developed in the paper. The topic that addresses PPPs should highlight the following aspects, considered crucial to the adequate functioning of such partnerships: 1) a robust legal framework - whose institutionalization begins by appropriate legislation debated with society; 2) effective monitoring mechanisms; 3) careful design, preparation, evaluation, acquisition, contracting and supervision; 4) guarantees are a fundamental part of the process and should comprise the legal and governance framework. These complex variables involve capacity building in the public sector for the coordination and management of PPP programs. • The paper could address the alignment of national government's transfers with municipalities' medium to long term planning.
<p>Negative aspects: approaches considered inconsistent with best practices in the area</p>	<ul style="list-style-type: none"> • To some extent, it is important to highlight the risk of centralization of investments in cities by national governments, removing municipalities' ability to decide on their local priorities. On the other hand, the complete budget decentralization may not be an adequate way to improve the quality of expenditure (including due to the limited management capacity of local governments). In this context, it is more important to promote dialogue and cooperation between different levels of government, respecting, on one hand, the ability of management and financing of national governments and, on the other, the autonomy of local governments and their legitimacy to define investment priorities.
<p>General comments</p>	<ul style="list-style-type: none"> • The policy paper takes a municipalist view of the issue of financing, implying that the less interference from the national government in resource management, the better (aiming at the same time for an ideal situation of full capacity of municipal management). Such a view translates into an idea of "empowerment" of cities to address urban issues – a premise that is appropriate and consistent with the Brazilian federative model. However, as regards the specific topic of financing, full allocative and management decentralization may not be the ideal model, because it would hamper redistributive policies and the fight against regional inequalities. Finally, rather than expand the amount of resource transfers from central governments to municipalities, it is necessary to increase the self-financing capacity of local governments – improving their tax management and promoting the use of alternative sources of financing, such as social management of real estate valuation and securitization of municipal assets. The New Urban Agenda should address the possibilities of expanding national and international cooperation on this topic.
<p>Specific comments</p>	<ul style="list-style-type: none"> • Regarding the expansion of revenue collection, it is important to emphasize the need of accurate information on the tax base (good and updated records in order to integrate information and avoid rework). As far as

	<p>property taxes are concerned, it is important to bear in mind that they should be kept at fair prices and updated according to the structuring characteristics of the territory, the particulars of the buildings and residents' or users' payment capacity. In addition to being important sources of revenue, updated property taxes can help control land prices, as well as prices of commercial and residential units.</p> <ul style="list-style-type: none"> • The final document should also discuss the use of mechanisms such as "created land" ("solo criado") and charges for additional building rights as a way of increasing revenues for urban development, as well as the possibility of "securitization" of these rights to build (granted against payment by the government) for use as loan guarantees and/or trading in capital markets. • As regards the adequate functioning of legal and institutional frameworks, it is important to strengthen local capacity for the proper taxes and duties' calculation. • The policy paper should also discuss private financing possibilities of urban development (including innovative strategies such as crowdfunding) and the importance of including informal situations in tax management for both the expansion of revenue and the promotion of the recognition of these situations (forms of inclusion), as well as a fiscal education strategy.
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6 - Urban Spatial Strategies

<p>Positive aspects: issues presented in the paper that are considered of particular importance and/or should be maintained</p>	<ul style="list-style-type: none"> • The importance of aligning the document with Sustainable Development Goal 11, including the emphasis on the access to safe, inclusive and accessible green and public spaces and the importance of supporting economic, social and environmental links between urban, peri-urban and rural areas. • The need to foster participation in public space planning and design. • The reference to alternative strategies for areas where traditional measures failed.
<p>Omissions: relevant issues that were not addressed in</p>	<ul style="list-style-type: none"> • The document fails to address urban problems in light of the urban land market and its potential regulation by the government, including through mechanisms to capture the added value generated by public investments or changes in urban rules. The possibility of addressing the price of urban land and policies that can influence it

<p>the document</p>	<p>should be considered, considering, among others, the aim of making the land served by infrastructure affordable to the poor.</p> <ul style="list-style-type: none"> • The document addresses insufficiently the issue of spatial segregation in urban areas and its relation with the maldistribution of urban infrastructure in the cities. • Discussions on the issue of land value, real estate market and urban land speculation and consequences of territorial segregation were also absent. • The paper should deepen the discussion on underutilized land and buildings, addressing mechanisms aimed at promoting the occupation and use of underutilized real estate, especially in areas with good infrastructure. • The issues discussed in the paper were not discussed under the perspective of metropolitan areas, leaving a void on which spatial planning measures should be adopted between local and metropolitan areas. • The indicators mentioned in the text should be further detailed, describing innovations and alternatives on the implementation and monitoring of the New Urban Agenda. • As regards green areas, the document should also discuss the situation of the rivers in the cities, where many are channeled, diverted, embanked or polluted, as well as their linkage with urban green areas – which are crucial to ensure the health of water bodies and the provision of ecosystem services related to the quantity and quality of water, as well as recharge areas, which are lost by the high impermeabilization of urban soil. • On page 6, the paper should highlight the most important points of the reviewed key publications/documents.
<p>Negative aspects: approaches considered inconsistent with best practices in the area</p>	<ul style="list-style-type: none"> • The document is rather alarmist on the question of population growth (p. 4) –mentioning, for instance, the risk of rural regions' cultural destruction based on the mere prospect of a reduction of only 1% of the rural population– and disregards the fact that migration changes significantly the distribution of estimated population growth. Furthermore, the paper addresses the persistence of poverty without taking into account recent advances in the fight against this challenge all over the world, and envisages a scenario of environmental disasters, without taking into account international developments in environmental protection. • Although it is necessary to allocate a significant percentage of urban for public spaces, the requirement to allocate 45% of it (p. 8 and 15) does not take into account typical housing needs of the most populous and developing countries and could hamper options for more compact cities.

<p>Information that needs to be corrected and/or updated</p>	<ul style="list-style-type: none"> • On page 9, the reference to a qualitative concept of urbanization could be made clearer.
<p>Additional comments</p>	<ul style="list-style-type: none"> • The paper could discuss the role of urban legislation in creating incentives for promoting public and private buildings that are urban-friendly through the implementation of public fruition areas, internal roads for public use and active façades and integrating private projects into public spaces. Governments can encourage or require that public or private projects provide for a percentage of land allocated to areas for public enjoyment - small squares of collective use integrated to the street. The internal roads for public use may be crossing paths aimed at non-motorized modes of transport that shorten distances and enable greater safety and comfort to pedestrians. • As regards the development of new urban-rural relationships supportive of sustainable urban development, urban centers should support agricultural production activity aimed at providing adequate food supply to meet their demand – while rural areas should receive specific policies, more urbanized areas may also allocate spaces for the development of urban agriculture. In this context, it is worth highlighting the importance of promoting actions in urban and peri-urban agroecology, creating green belts around cities to produce healthy food. • As already noted in commentaries to Policy Paper 1, it is necessary to bear in mind the need to plan urban space so that it does not form an obesogenic environment. In this regard, it is important to develop public actions and policies that prevent urban dwellers (especially the poorest) from adopting a sedentary life routine and ingesting a diet high in processed foods and with high levels of sodium and fat, because of the poor conditions in the daily routine. • In the elaboration of recommendations of access to inclusive spaces, it is important to bear in mind that the prioritization of underserved portions of the city (p.11), exemplified by the issue of infrastructure in informal settlements, should be associated with land regularization, so that it does not become an incentive for more illegal occupation.

7 - Urban Economic Development Strategies

<p>Positive aspects: issues presented in the paper that are considered of particular importance and/or should be maintained</p>	<ul style="list-style-type: none"> • The need to consider the specificities of local conditions in the formulation of economic development strategies for cities and the recognition that there is no single recommendation able to encompass the different local characteristics. • The emphasis on job creation and formalization as key measures for social inclusion, economic vitality and urban sustainable development. • The emphasis on the importance of land use policies for the formulation of sustainable urban development strategies. • The recognition of connectivity as a driver of greater productivity in urban services and activities. • The importance of planning and monitoring for the elaboration of successful sustainable development strategies.
<p>Omissions: relevant issues that were not addressed in the document</p>	<ul style="list-style-type: none"> • The document did not discuss institutional strategies for conurbations, metropolitan areas and other settlements where there are common problems requiring an intermediate coordination between cities and the sub-national entities. • The paper should further discuss the role of metropolitan areas in the topic of "clearer demarcation of boundary of competencies between central, state, metropolitan and local governments" (p. 19), as well as in job creation policies, addressing, for instance, the potential positive effects of combining employment policies with regional polynucleation. • The paper should deepen the discussion on how information and communication technologies can boost connectivity and how this increased connectivity can lead to better urban services and business environment. • Given the importance of decent work in the promotion of social inclusion in the cities, the paper should recommend the adoption of decent work indicators at the local level for the monitoring and evaluation of the challenges mentioned in the document. • The paper should also give more attention to the discussion of measures aimed at reducing gender inequality in the world of work. • On page 22, SDG 3 (Ensure healthy lives and promote well-being for all) should be included among the other linkages with the Agenda 2030.

<p>Information that needs to be corrected and/or updated</p>	<ul style="list-style-type: none"> • On page 2, the expression “food security” should be replaced by “sustainable food systems”, language agreed in the Framework for Action at the Second International Conference on Nutrition (ICN2), available at http://www.fao.org/3/a-mm215e.pdf.
<p>Additional comments</p>	<ul style="list-style-type: none"> • Despite being a recurring theme throughout the text, there are no specific indicators on the effectiveness of land use policies. Indicators on formalization of urban land use and on housing in risk areas should be incorporated as the minimum necessary to fill this gap. • In the elaboration of recommendations, it is important to consider the strong correlation between the right to urban mobility and access to education and employment. Deficiencies in urban mobility affect directly and indirectly vocational training, job search, time spent in home-work displacement, and influences the turnover rates – mainly of young persons. • More attention to the elaboration of databases on economic and social performance of urban services, as well as to the articulation with the SDGs, should be given in the final text.

8 - Urban Ecology and Resilience

<p>Positive aspects: issues presented in the paper that are considered of particular importance and/or should be maintained</p>	<ul style="list-style-type: none"> • The integrated vision between resilience and urban ecology and the importance of implementing a paradigm shift in the way cities are built are key aspects. Specifically, it is important to highlight the notion that the future city must be resilient on a number of scales (neighborhood, district, city, region) and must have green infrastructure, accessibility and mobility, good urban form, greater collaboration between stakeholders and empowered marginalized communities. • The need for involvement of the local population in decision-making processes, with an emphasis on gender, marginalized communities and grassroots institutions and the importance of empowering these actors to actively participate in the formation of urban structure and function. • The need for systemic planning to simultaneously integrate housing, transport, energy and green systems and the importance of having more efficient, adaptable, creative and inclusive urban planning models, in order to better respond to urban disasters and stresses. • The importance of investing in sustainable and efficient infrastructure that can meet the growing demand for services such as energy, water and food, while ensuring environmental sustainability.
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	<ul style="list-style-type: none"> • The emphasis on legal and institutional development, governance and policy coordination accompanied by technological innovation, with a view to improving resilience. • The importance of capacity building for local authorities and communities. • The importance of increasing education on urban ecology and resilience at all age levels, from primary school through university and continuing education.
<p style="text-align: center;">Omissions: relevant issues that were not addressed in the document</p>	<ul style="list-style-type: none"> • The Sendai Framework for Disaster Risk Reduction 2015-2030 stresses the importance of "Build Back Better", which should be addressed in the paper. According to the Sendai Framework, the recovery, rehabilitation and reconstruction phase, which needs to be prepared ahead of a disaster, is a critical opportunity to "Build Back Better", including through integrating disaster risk reduction into development measures. • The paper should also address the importance of developing more consistent processes of monitoring and tracking of contingency and risk situations, aiming to preserve the physical integrity of people, the environment and water resources, especially in activities related to industrial and agricultural use of water, tailings disposal derived from mining, etc. • The paper should also discuss the implementation of environmental impact studies, which may avoid risk situations and detect possible effects of projects on the physical and social environment in which will be inserted. In this context, diagnostics and scenario studies should be required to assess the construction of large buildings or activities with potential impact. • The document should address the concept of water security, which was not discussed in any of the policy papers. There is only a passing reference to water stress on page 2, which is not further considered in the text. • The issues discussed in the paper should also be approached from the perspective of metropolitan areas. • The paper recognizes the importance of indicators, but does not present a proposal for a system of indicators, which should be aligned with the SDGs. Such indicators should focus on measuring the results of policies in implementation, monitoring and evaluation phases. In this respect, only three examples of indicator frameworks are presented, but not further detailed (pages 17 and 22). • The paper should provide a better integration of the discussed topics with the aspects of risk management that lead to increased urban resilience: prevention, mitigation, preparedness, response and recovery. Furthermore, it is important to encourage the implementation of management actions for disaster risks with an intersectoral

	and articulated approach between governmental and non-governmental institutions and community (pages 32 and 33).
Information that needs to be corrected and/or updated	<ul style="list-style-type: none"> • The paper should provide the definitions of resilience and ecosystems. In this respect, the 5th Assessment Report of the Intergovernmental Panel on Climate Change (AR5 IPCC, 2014) quotes the Arctic Council's (2013) definition of resilience as "the capacity of social, economic and environmental systems to cope with a hazardous event or trend or disturbance, responding or reorganizing in ways that maintain their essential function, identity and structure, while also maintaining the capacity for adaptation, learning and transformation." The Convention of Biological Diversity (1992), in its turn, defines ecosystem as "a dynamic complex of plant, animal and micro-organism communities and their non-living environment interacting as a functional unit." • On the second paragraph of page 2, bibliographic reference should be provided for the statement that "Climate change alone will place new social, fiscal and political pressures on urban systems, with a ten-fold increase in flood-related losses to \$52 billion by 2050, and forty percent of urban residents affected by water stress." • On page 8, point 1.b.6.ii, given that the emphasis on the approach to climate change at the city level is in adaptation, the referred item should be replaced for "Adaptation to climate change may carry significant costs". • On page 9, paragraph d.1 (SDG goals and targets), the reference to climate change as a natural phenomenon ("natural phenomena such as climate change on the global environment") is not fully correct since the object of the UNFCCC are the anthropogenic emissions of greenhouse gases, <i>i.e.</i> the change of climate induced by human activity. • On page 11, point 2.b.2.v, the term "low-carbon" should be deleted, given that it is not used in the UNFCCC. The same applies to "climate neutrality", which, alternatively, should be clearly defined. • On page 16, point a.3, the concept "climate-smart" should be deleted, given that it is not recognized multilaterally.
Additional comments	<ul style="list-style-type: none"> • In general, the document is quite comprehensive, covering a wide range of issues and contexts (governance, policy, capacity, planning, infrastructure, environment, culture, livelihoods and consumption), enumerating actions from simpler to more complex levels of institutional and social articulation. Nevertheless, there should be greater linkage between recommendations and the SDGs and the Sendai Framework for Disaster Risk Reduction 2015-2030.

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| | <ul style="list-style-type: none">• The paper should favor an approach focused on strengthening the capacity of cities to respond to pressures and impacts of human activities through measures of mitigation and adaptation to climate change so as to promote the resilience of cities. In this respect, ecosystem-based management, approach also known as "Ecosystem-based Adaptation" (EbA), may play an important role, given that, besides being cost-effective and a non-regret measure, its activities are able to produce a number of side benefits for urban communities.• Forest remnants, street arborization, green urban areas and ecological corridors should be given greater attention in the document, given their prominent role in the urban ecosystem.• The paper should deepen the discussion on urban legislation and resilience. In this context, normative frameworks could establish the compulsory alignment of public and private projects with resilience principles. Therefore, new projects should, for instance, be required to preserve a portion of their lot's natural soil or a parcel of forested land. Other mechanisms could also be considered, such as water capture boxes or structures that deter the flow of water to the public drainage system, thus preventing flooding. Finally, administrations may also encourage or require the implementation of water reuse mechanisms and energy saving solutions.• It is also important to note that the reduction of disaster risk is a cost-effective investment to prevent future losses. In order to reduce the risk of disasters, it is necessary to focus on: monitoring, assessment and understanding of the risk of disasters and to share the information and how they are generated; strengthening disaster risk governance and coordination between institutions and relevant sectors, as well as the complete and meaningful participation of stakeholders; investment in economic, social, health, culture and education resilience of people, communities, countries and the environment, including through technology and research; improvements in early warning systems for various hazards, considering the aspects of preparedness, response, recovery, rehabilitation and reconstruction.• In addition to the actions and national capacities, it is necessary to intensify international cooperation between countries and international organizations. |
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9 – Urban Services and Technology

<p>Positive aspects: issues presented in the paper that are considered of particular importance and/or should be maintained</p>	<ul style="list-style-type: none"> • The actions and recommendations for urban mobility are considered of particular importance, especially the integration with land use policies, the promotion of densification, non-motorized modes, public transport and travel demand management. In this respect, the lack of adequate urban mobility infrastructure in the face of growing demand, the need for funding, and and the high number of traffic accidents and deaths are the challenges of special importance.
<p>Omissions: relevant issues that were not addressed in the document</p>	<ul style="list-style-type: none"> • Regarding the issue of transport and mobility, the paper mentions SGD 11.2, but fails to include SDG 3.6, which sets the target to halve the number of global deaths and injuries from road traffic accidents by 2020. It is important that both SDG 3.6 and 11.2 are reflected in the New Urban Agenda, as complementary targets on road safety. <ul style="list-style-type: none"> - In this respect, taking into account that the majority of road deaths and injuries take place in urban areas and, thus, considering the importance of giving due attention to the issues of sustainable urban mobility and enhanced accessibility to destinations, activities, services and goods, the Brasilia Declaration on Road Safety, adopted at the Second High-Level Global Conference on Road Safety (Brasilia, 18-19 of November 2015), recommended the United Nations Conference on Sustainable Urban Development and Housing, to give appropriate consideration to road safety and access to safe public transport and non-motorized modes of transport in the future New Urban Agenda. - Furthermore, it is particularly important to urge all levels of government to promote, adapt and implement road safety policies for the protection of vulnerable people among road users, in particular children, youth, older persons and persons with disabilities, in line with relevant UN legal instruments, including the Convention on the Rights of the Child and the Convention on the Rights of Persons with Disabilities (see OP16 of the Brasilia Declaration). • The paper should emphasize the need for better use of environmental resources, with respect to the use of rainwater, the reduction of losses in water systems, the reuse of sewage effluents, the use of energy deriving from the treatment of solid waste's effluents and sewage treatment plants, and rationalization of water use by

the population, among others.

- As far as sanitation is concerned, the following points should be considered:
 - The need to ensure access to basic sanitation (including drinking water supply, sanitary sewage systems, urban cleaning and solid waste management, and storm water drainage and management) with the necessary infrastructure and integrated to housing;
 - The need to ensure the development of local, regional and national information systems that account for the above-mentioned components of basic sanitation;
 - The need to recognize urban areas that are typical in some developing countries, such as slums and stilt houses, as urban designs amenable to interference and, thus, define actions and strategies for access to basic sanitation infrastructure in these urban conurbations;
 - The need to ensure funding and financial resources from federal entities for basic sanitation actions, particularly for interventions in low HDI locations and urban conurbations (such as slums and stilt houses) and especially for people in vulnerable situations;
 - The importance of ensuring the participation and social control by the local population during the discussion of the planning and implementation of basic sanitation infrastructure;
 - The need to ensure the use of new technologies and innovations in the production of materials used in sanitation, as well as advanced techniques in the development of construction methods;
 - The need to ensure that the implementation of the basic sanitation infrastructure is preceded by plans and projects, in accordance with local legislation and policies, as well as consistent with local realities;
 - The need to develop sanitation infrastructures that are reliable, sustainable, resilient, and affordable to all, focusing on equitable access;
 - The importance of strengthening community-based initiatives in the management of solid waste;
 - New technologies for decentralized treatment of domestic sewage, such as bio-septic tanks, evapotranspiration and root zones, may be interesting complementary alternatives to conventional collection and treatment systems.
- The paper should deepen the discussion on the challenges faced in metropolitan regions, given that the provision of transport and sanitation services in these areas requires a systemic perspective and permanent and coordinated actions.
- The debate on smart cities and technologies, considered of great relevance in the issue papers, has not been given adequate attention in the policy papers. The following points should be considered regarding this topic:

	<ul style="list-style-type: none"> - The document should discuss the creation of sustainable smart cities' models with long-term financing, giving due consideration to the fact that the successful implementation of smart cities projects depend on adequate legislation on data protection and strong ICT companies; - The need to stimulating the creation and development of solutions using the "Internet of Things"; - The importance of encouraging the development of technology-based companies (startups) focused on waste management, health, water and sanitation, public safety, urban ecology and energy; and promoting capacity building and training for the implementation of smart cities technology. Among others, the use of such technologies may reduce the waste of basic services through the implementation of integrated intelligent measurement in water, energy, gas and sanitation; the use of smart meters and sensors to meet consumer demand; and the promotion of energy efficiency and increased technological development in sectors such as construction and transport; - The importance of the participation of civil society in smart cities' projects and that the debate on “smart cities” is based on the promotion of social inclusion; - Smart cities projects must be adequate to cities’ contexts and particularities and take into consideration the strong asymmetry in the control of existing data about people. In this context, the paper could explore the potential effects of the use of Big Data in the management of cities, highlighting their problems and discussing the possible benefits for citizens. - The need of encouraging independent and collaborative ownership of open technologies, as well as the use of free software in public administration, especially in information systems for management and planning.
<p>Information that needs to be corrected and/or updated</p>	<ul style="list-style-type: none"> • On page 8, the following revised text is suggested for the topic on health: “Access to health care taking into account the principles of universality, integrity and equity. Balance among national, regional and local health services needs to be provided. The healthy living conditions in urban areas (air, water, soil, safety) need to be improved. The promotion of a conducive environment that promotes physical activity such as walking, and cycling is also to be considered”, which incorporates language of the Framework for Action adopted at the Second International Conference on Nutrition (ICN2), available at http://www.fao.org/3/a-mm215e.pdf (Recommendation 41: Create a conducive environment that promotes physical activity to address sedentary lifestyle from the early stages of life). • Furthermore, the notion expressed at sentences “The cost efficiency of health services through urban concentration of services with cost saving effects needs further fostering”, on page 8, and “Foster cost efficiency of health services through urban concentration of services”, on page 13, should be made clearer;

	<ul style="list-style-type: none"> • On page 13, the sentence “Ensure reliable operations/conditions for delivery of health services” should be replaced by “Ensure access to health based on the principles of universality, integrality and equity”.
General comments	<ul style="list-style-type: none"> • Brazil believes that the New Urban Agenda should address the need to guarantee full coverage of water supply and sanitary sewage systems with due quality and quantity, as well as the need for protection and maintenance of water supply sources and the importance of managing and reducing the proportion of solid waste to be disposed. • As far as health is concerned, Brazil believes that the New Urban Agenda, as well as the policy papers for Habitat III, should approach health care as one of its key pillars. It is essential to discuss the Social Determinants of Health: the conditions in which the population lives and works that directly affect the health problems and risk factors, such as food, housing, education, and other social and economic factors. Although these aspects are represented in the documents, the intersectionality and clear correlation between them and health is barely perceived. Moreover, the New Urban Agenda should clearly promote access to quality health services, as well as the creation of health systems based on the universal access to health and universal health coverage as a way to mitigate the health inequality within cities, addressing health as a right of the peoples.
Specific comments	<ul style="list-style-type: none"> • It is important to deepen the debate on solutions to metropolitan and urban areas with respect to management and coordination of the different levels of government to provide access to an efficient public transportation service and appropriate tariff policies, especially considering lower-income classes. • The discussions on transport and mobility should bear in mind that improving mobility policies involves the qualification of public transport system and the development of better and safer routes for non-motorized transport, as well as placing restrictions for private vehicles, such as setting a limit to the amount of spaces for the custody of light vehicles in urban projects (buildings with large areas for vehicle parking facilitate the choice of private transport as a means of transport). • As regards waste management, it is important to promote the transformation of landfills and "dumps", especially when not operated, in safe places for the population and, when feasible, reintegrate them into the city fabric in order to contribute to the ecological balance and to public activities related to recreation and sports. • Regarding management of water and waste, it is important to adjust existing water treatment systems in order to guarantee water in sufficient quantity and adequate quality as a measure to minimize health risks; to

	<p>ensure the provision of safe water on a continuous basis to the population; to track the potential sources of contamination in river basins so as to establish balance of land use and occupation; and to quantifiably reduce the incidence or prevalence of water related diseases.</p>
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10 – Housing Policies

<p>Positive aspects: issues presented in the paper that are considered of particular importance and/or should be maintained</p>	<ul style="list-style-type: none"> • The need for a simultaneous twin-track approach with curative (slum upgrading) and preventive (new provision) housing policies, corroborating the understanding of housing as a policy that should be implemented with attention to precarious settlements and their urbanization, as well as housing provision. • The paper addresses key issues which are considered criteria of housing precariousness in Brazil, such as overcrowding, lack of access to services and infrastructure, and poor building quality, and recognizes insufficient access to infrastructure and the dysfunctions of the land market as major causes of urban informality. • The need to expand and improve the supply chain of social housing stock, including social rental, as well as the importance of promoting alternatives to private property to ensure security of tenure and access to housing. • The importance of using local and regional materials and techniques appropriate to local conditions. • The importance of the monitoring of goals and objectives related to the subject, as well as the analysis of SDG 11 indicators.
<p>Omissions: relevant issues that were not addressed in the document</p>	<ul style="list-style-type: none"> • The paper could have presented a deeper discussion on the issue of land value and its relation to the debate on social inclusion. In this context, it could approach the development of urban-financial policies to enable the allocation of housing aimed at middle and low income families in central areas. In addition to improving the conditions of peripheral areas, it is important to encourage the production of housing for families of lower income where the territory is historically more expensive, given the existing infrastructure and conditions of mobility. • The document should present a more thorough discussion on the strengthening of governments and local administrations, introducing instruments and strategies. • The text should address climate issues in the context of housing policies. • The paper should deepen the discussion on the challenges faced in metropolitan regions, given that the

	<p>provision of housing in these areas requires a systemic perspective and permanent and coordinated actions.</p> <ul style="list-style-type: none"> • The paper should address the point raised in Policy Paper 1 on the need to provide housing options with diverse typologies and with priority allocation to women.
Information that needs to be corrected and/or updated	<ul style="list-style-type: none"> • On page 6, paragraph 2 of item 1.1, the text in brackets should be suppressed, given that the list provided is non-exhaustive and since the mentioned groups are included in the concept of "vulnerable and special needs groups". • On page 6, the expression “health including sexual and reproductive health” should be replaced by “health including sexual and reproductive health and rights”. • Also on page 6, the term “nutritious food” should be replaced by “food security and nutrition”, incorporating the language of Recommendation 3 of the Framework for Action of the Second International Conference on Nutrition (ICN2), available at http://www.fao.org/3/a-mm215e.pdf (Recommendation 3: Strengthen and establish, as appropriate, national cross-government, intersector, multi-stakeholder mechanisms for food security and nutrition to oversee implementation of policies, strategies, programmes and other investments in nutrition. Such platforms may be needed at various levels, with robust safeguards against abuse and conflicts of interest.
Additional comments	<ul style="list-style-type: none"> • The paper would benefit from a cross-sectional and more integrated approach to the root causes of housing challenges. For instance, the lack of access to basic services is rather disconnected from the access to land (which ideally should have adequate infrastructure). Similarly, the paper should address the linkages between the issue of affordability and the problem of scarcity, which causes high prices and leads to the informal use and occupation of urban land. Finally, the excessive itemization also casts shadow on the obvious link between the increased density of housing units, their scarcity and high prices. • Recommended actions should take into consideration that increased access to funding would be an innocuous measure without due solution to the chronic shortage of housing alternatives aimed at the low-income sector. • Considering the urban-rural continuum, the elaboration of housing policies should consider rural areas as an essential living space for a great part of the population and where there is a very important housing demand – with a differentiated scale of space appropriation, which must be respected. • The presentation of best practices and lessons learned can be an interesting way to further develop the subject and confirm the effectiveness of interventions in housing and slum upgrading.