

# Atlas of the Brazilian Digital Ecosystem Regulation

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# About Reglab

We are a private research center specialized in the media and technology sector. We help companies, associations, and policymakers make strategic decisions based on data and evidence.

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## About our special formats

Our special formats include customized content solutions for specific clients. In this case, Reglab has prepared a regulatory mapping: a non-exhaustive survey of laws, decrees, and other federal regulations applicable to the digital ecosystem in Brazil.

Although prepared with technical rigor and responsibility, this report is an action-oriented tool rather than an academic paper or replicable scientific research. The content is based on the analysis of public documents available as of November 6, 2025.

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## Acknowledgements

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# Introduction: Why map the regulation of the digital ecosystem in Brazil?

A broad set of regulations forms a consistent governance structure for the digital environment in Brazil. The Atlas of the Brazilian Digital Ecosystem Regulation aims to bring visibility to this framework. Inspired by the work of the [Centre for European Policy Studies \(CEPS\)](#), which identified and cataloged dozens of legal instruments and governance mechanisms in the European Union, this study adapts that approach to the Brazilian context.

Our goal is to gather regulatory instruments in a public and visual database that shape the Brazilian digital ecosystem, including laws, decrees, executive branch acts, and self-regulatory instruments; and identify the institutions responsible for drafting, implementing, and enforcing them. By systematizing this information, the mapping provides a clear and accessible portrait of digital governance in Brazil. This effort contributes to public debate and supports evidence-based policymaking.

Given the dynamic and constantly evolving nature of this field, this study is a work in progress, reflecting the continuous evolution of the regulatory system. The database consists of two tables:

- **Table 1:** Regulatory instruments relevant to the digital governance ecosystem. The survey includes regulatory instruments enacted up to November 6, 2025, which serves as the formal cutoff date for this research. After this date, we selectively included certain approved instruments widely recognized as relevant to the Brazilian digital ecosystem. These additions do not represent a systematic review of all thematic axes but rather targeted updates restricted to regulations of more relevance.
- **Table 2:** Bodies, institutions, and associations that contribute to the drafting, implementation, and enforcement of the regulatory instruments identified in Table 1 related to digital governance.

We developed our database by classifying regulatory and governance instruments into 17 thematic areas: Advertising; AI; Audiovisual; Betting & Online Gaming; Children; Cloud Computing; Competition; Connectivity; Content Creators; Content Moderation; Cybersecurity; E-commerce & Consumer Protection; Fintechs & Crypto; Industrial Policy; Intellectual Property; Privacy & Data; Research & Development. In the **“Scenarios and Trends”** section, we present legislative movements, such as bills and regulatory proposals addressing core digital agenda topics. If approved, these measures could significantly alter the regulatory structure of the Brazilian ecosystem.

## EXPLANATIONS REGARDING THE SURVEY AND METHODOLOGICAL RESERVATIONS

This mapping was conducted as exploratory and non-exhaustive research. We performed searches using keywords on Google, relying exclusively on official sources. Our goal was to gather a representative set of regulations and acts with a direct impact on the digital environment's regulation, without claiming to be exhaustive. We made no analytical inferences or value judgments regarding the content of the regulations; therefore, the result reflects a purely descriptive mapping.

The database excludes interpretative or administrative documents, such as technical notes and official announcements, because they fulfill an advisory role rather than establishing normative obligations. We also excluded ordinances regarding regulatory agendas due to their dynamic nature, as well as judicial decisions and internal management acts.

A key reservation regarding ANATEL: Virtually all of the agency's normative acts concern connectivity, a specific thematic axis of this project. Including the entire collection would artificially expand the database, creating asymmetries that would compromise comparability with other themes. For these reasons, we prioritized only regulations with direct and material impact.

# Scenarios and Trends

**An overview of proposals that could transform the regulatory environment in the coming years.**

## AI Regulation

Brazil does not yet have specific federal legislation on AI. However, in December 2024, the Federal Senate approved Bill 2,338/2023, which is currently the main proposal under discussion in the National Congress regarding technology regulation in Brazil ([Agência Senado, 2024](#)).

Bill 2,338/2023 establishes an extensive set of measures for regulating the development and use of artificial intelligence. The text adopts a risk-based approach, defines a broad list of rights for users affected by these technologies, and institutes regulatory governance mechanisms for implementing and supervising AI-related practices.

Since May 2025, the project has been moving through a Special Committee in the Chamber of Deputies. Currently, the process awaits the publication of the rapporteur's

opinion, which must be voted on in a plenary session. If approved, it will return to the Senate for final deliberation ([Kaufman, 2025](#)). Therefore, Bill 2,338/2023 still has to go through some stages before its potential approval by the National Congress.

## Competition Regulation

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The regulatory landscape for digital markets in Brazil has gained significant relevance in recent months. In October 2024, the Secretariat for Economic Reforms of the Ministry of Finance (SRE/MF) published the report “Digital Platforms: Economic and Competitive Aspects and Recommendations for Regulatory Improvements in Brazil.” Based on international experiences and contributions from a public consultation held between January and May 2024, the document indicates that the tools provided by the Competition Law (Law 12,529/2011) are insufficient to address the dynamics of digital markets ([Ministério da Fazenda, 2024](#)).

Following this diagnosis, in September 2025, the Federal Government sent Bill 4,675/2025 to the Chamber of Deputies, proposing economic and competition regulation for large technology companies. Drafted by the SRE/MF and a technical group coordinated by the Chief of Staff’s Office (Casa Civil), the text suggests reforming Law 12,529/2011 by incorporating new instruments focused on “systemically relevant” economic agents ([Ministério da Fazenda, 2025](#)). These agents, characterized by substantial economic power and influence over digital market dynamics, would be subject to specific compliance duties. These include maintaining a local office, registering with CADE (the Administrative Council for Economic Defense), submitting all mergers and acquisitions for prior review, and disclosing information regarding the offering and use of their services.

Currently, Bill 4,675/2025 awaits a referral from the President of the Chamber of Deputies, with the urgency request still pending deliberation ([Câmara dos Deputados, 2025](#)).

## Content Moderation

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The main legal instrument guiding content moderation in Brazil was Article 19 of the Brazilian Civil Rights Framework for the Internet. This article limited the civil liability of platforms to cases where a specific court order for content removal existed. However, on June 26, 2025, the Supreme Federal Court (STF) declared this provision partially unconstitutional and established new rules for content moderation, reshaping the legal foundations of liability and online content governance in the country. This decision represents a recent milestone with significant systemic impact, and its practical consequences and judicial consolidation are still unfolding.

On September 23, 2025, the Superior Court of Justice (STJ) decided not to apply the STF’s new interpretation immediately. The STJ noted that the decision was not yet final and its effects could still be adjusted through pending legal appeals ([Brasil, 2025](#)). With the official publication of the ruling on November 5, 2025, the period for further appeals began, and the

final scope of this decision and its impact on the content moderation regime still depend on future clarifications from the STF.

Additionally, on September 17, 2025, the government enacted Law 15,211, which established the Digital Statute for Children and Adolescents (Digital ECA). This law imposes expanded duties for active content moderation and removal on platforms likely to be accessed by minors, regardless of a court order. Set to take effect in March 2026, this law adds a new layer of complexity to the regulatory landscape. Brazil's framework now combines proactive intervention obligations with a judicial precedent that is still being consolidated.

## Digital Creators

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In the last ten years, the National Congress has received more than 80 bills aimed at regulating the activities of digital influencers. These proposals cover topics such as content rules, advertising and digital marketing, professional recognition, and the protection of minors in online environments ([Ramos; Garrote; Brombine, 2025](#)).

Among these, Bill 3,444/2023 stands out; it was approved by the Chamber of Deputies in October 2025 and is currently moving through the Federal Senate ([Piovesan; Miranda, 2025](#)). The bill amends the Statute for Children and Adolescents (ECA) to establish that artistic representation activities involving children and adolescents require judicial authorization, while other forms of economic exploitation in digital environments are prohibited.

## Advertising for Online Betting

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In Brazil, bills seeking to further restrict advertising for online betting are gaining prominence. In May 2025, the Senate approved Bill 2,985/2023, which proposes banning advertisements and marketing actions for fixed-odds betting involving athletes, artists, communicators, influencers, or public authorities. The measure, which now moves to the Chamber of Deputies for review, reflects a growing concern regarding the promotion of gambling and its potential addictive effects, especially among young people and vulnerable audiences ([Agência Senado, 2025](#)).

## Audiovisual Regulation

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The debate regarding the regulation of streaming and video-on-demand services advanced significantly in the National Congress during 2024 and 2025. In April 2024, the Federal Senate approved Bill 2,331/2022, which regulates video-on-demand services, audiovisual content-sharing platforms, and Internet Protocol Television ([Agência Senado, 2024](#)).

In the Chamber of Deputies, Bill 2,331/2022 was joined with Bill 8,889/2017, which already addressed the same topic. Both were analyzed together, and the Plenary approved a favorable opinion for the consolidated projects. Since the version approved by the

Chamber substantially revisits and incorporates the matter previously passed by the Senate in Bill 2,331/2022, the Senate Presidency designated the matter as a “Chamber Substitute” to Bill 2,331/2022 and archived Bill 8,889/2017 ([Senado Federal, 2025](#)).

As a result, legislative deliberation will continue with Bill 2,331/2022 as the primary proposal. This consolidates the discussion on establishing rules for streaming and video-on-demand services, including the extension of the Contribution for the Development of the National Cinematographic Industry (Condecine) to these platforms to promote the Brazilian audiovisual sector.

## Protection of Children and Adolescents in the Digital Environment

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On September 17, 2025, the government enacted Law 15,211/2025, establishing the Digital Statute for Children and Adolescents (Digital ECA). While the law sets unprecedented protection rules for minors online, it requires specific regulations to define compliance and enforcement procedures which were not published yet.

To address this, an Intersectoral Committee, comprising the Ministry of Justice and Public Security (MJSP), the Ministry of Human Rights and Citizenship, the Secretariat of Social Communication, and CONANDA, held a [Public Consultation between October and November 2025 to gather input for the Digital ECA’s regulation](#).

During the same period, the MJSP opened [another Public Consultation regarding age verification mechanisms for information technology products and services](#), seeking contributions from users, companies, and civil society organizations. Together, these two consultations gathered over 130 contributions, reflecting broad public interest in regulating digital environments for minors.

Furthermore, the National Data Protection Authority (ANPD), responsible for overseeing the Digital ECA, opened a [call for contributions in late November to identify which concepts in the Statute require additional clarification](#). The goal is to reduce ambiguities that could hinder implementation and compromise the law’s effectiveness. This movement reinforces the government’s effort to consolidate minimum operational guidelines before final regulation is established.



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