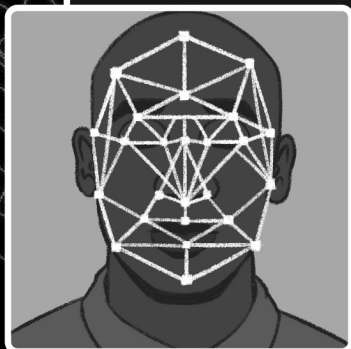


# THE INVISIBLE INTEGRATION

An Integrated Border Operations Center's study



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This report is produced by Data Privacy and TEDIC as part of a project funded by Privacy International and is part of a series of publications that seeks to guide and inform on the deployment of technology in the Triple Border Area.



**DataPrivacyBR**  
Research

**Data Privacy Brasil Research Association** is dedicated to the interface between protection of personal data, technology and fundamental rights, producing research and advocacy actions before the Justice system, legislative bodies and government. Based on an Ethical Financing and Transparency Policy, the association carries out public interest research that seeks to reinforce the grammar of fundamental rights and expand the culture of personal data protection in Brazil and the Global South.



**TEDIC** is a Non-Governmental Organization founded in 2012 whose mission is to defend and promote human rights in the digital environment. Its main topics of interest are freedom of expression, privacy, access to knowledge and gender on the Internet.

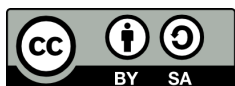
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# EXECUTIVE SUMMARY

This report offers an initial characterization of the Integrated Center for Border Operations (CIOF), a Brazilian public security programme. Its goal is to fight transnational organized crime and integrate different public security agents to centralize information under one roof.

Located in the Triple Border Area, in Foz do Iguaçu, the CIOF programme has conducted efforts to transnationalize itself since its inauguration in 2019. As a result, several invitations have been sent to Paraguayan public security and intelligence institutions to join such a Center through official representatives.

The methodology has combined different data collection methods to avoid researcher bias and gather information from specialized documentary and interviewee sources. As an outcome, the report offers numerous findings around CIOFs institutional membership, database management and its national and international projection. Concretely:

- Data sources from both sides of the border suggest that CIOF is the trend to come and will replicate itself across Brazil and the Triple Border Area. I.e. Argentina is finalizing its own Integrated Center in the same area.
- There is an institutional wish from Brazilian authorities to internationalize the membership within CIOF. There is at least evidence of 3 invitations sent to Paraguayan institutions: The Ministry of Interior, the National Police and the National Anti-Drug Secretariat (SENAD).
- There is evidence of apparent information exchange between the CIOF and the Tripartite Command, another tri-national security programme in Puerto Iguazú.
- There is interesting complementation in the findings from Brazil and Paraguay concerning international actors' involvement in the Triple Border Area. The Paraguayan side identified the interest of the European Union in promoting the adoption of integrated centers such as CIOF in the area. The Brazilian side identified a significant U.S. presence in the CIOF implementation through visits of Brazilian authorities to the U.S Fusion Centers and sharing information agreements.

- CIOFs database can be accessed when solicited by public security organs (regardless of them being members of the Center). Additionally, CIOF does not have a privacy policy document, and the intention of producing one is not known. There is also no administrative act that regulates the collection and processing of these data.

Lastly, based on the numerous findings, the report produced a stakeholder map showcasing the leading national and international actors linked directly and indirectly with CIOF.

*Keywords: Triple Border Area, CIOF, database integration, security, border, privacy, data protection*

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# THE INVISIBLE INTEGRATION

## An integrated Border Operations Center's study

### INTRODUCTION

In December 2019, a public security project with the aim of strengthening relations between Brazil and Paraguay was announced. The public security program was called the Integrated Center for Border Operations (CIOF by its Portuguese and Spanish acronyms) (Ultima Hora, 2019). The main purpose of the project is to contain organized crime in the region of Foz do Iguaçu and the Triple Border Area<sup>1</sup>, shared by Argentina, Brazil, and Paraguay.

During the inauguration event, the then Minister of Justice and Public Security in Brazil, Sergio Moro, mentioned that

“Cooperation with other Mercosur countries has always been positive and the tendency is to seek representatives of police officers, attachés or agents to work within the Integrated Center” (Governo do Brasil, 2019).

Such cooperation with Mercosur countries took shape last year, with an official invitation extended to the Paraguayan Government, seeking designated representatives to join the CIOF in Brazil (La Nación, 2020b).

It is essential to point out that programs such as CIOF are inserted in a broader technologisation trend of security policies in Brazil and particularly in the Triple Border Area. I.e. The Brazilian government bought highly intrusive drones of Israeli origin in 2013 as part of their security strategies for the Copa de Confederações (Folha de S. Paulo, 2013). Media outlets have also pointed out that similar

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<sup>1</sup> The Triple Border Area is a border area shared by Argentina, Brazil and Paraguay. More information [https://en.wikipedia.org/wiki/Triple\\_Frontier](https://en.wikipedia.org/wiki/Triple_Frontier)

technology was also bought in Argentina to be deployed in different borders throughout the country (Agostini, 2017). More recently, the Paraguayan government has deployed the Automated Migration System for Facial Recognition (Smarf), a technology that registers the biometric facial data of people moving through the International Friendship Bridge, at the border crossing between Ciudad del Este (Paraguay) and Foz do Iguaçu (Brazil) (López, 2021).

Based on the above, the current research seeks to better understand the way CIOF was developed and how it has established relationships with Paraguayan institutions. Additionally, it also seeks to better understand how CIOF is potentially linked to security agendas and foreign governments. And more broadly to international cooperation agendas interested in implementing this type of security models throughout the world.

Moreover, the current research had a particular interest in better understanding the nature of the CIOF database. Concretely: how the CIOF database currently works, which public and private stakeholders are currently involved in its operation and what data sharing practices are currently in place and shared across countries.

There is a need to shed light in the way security & technology policies in the region are deployed. This research constitutes an exploratory research of the CIOF database, with a particular geographical focus in Brazil and Paraguay.



## **A. Project Goal and Methodology**

The current research aims to achieve an enhanced public understanding of the CIOF database and how public and private stakeholders are involved in its management and deployment.

To achieve the above, a methodology based on three data collection processes was conducted parallelly in Brazil and Paraguay. This with the aim of shedding light on the different national and international stakeholders involved in the CIOF, and aiming at designing a stakeholder map that fully depicts the CIOF and its actors to date.

The research conducted a desktop research comprising a documentary review (DR) followed by freedom of access to information (FOIAs) requests. Upon the completion of the desktop research, the research conducted 5 interviews with specialized sources from public institutions. Interviewees were from Brazil (3) and Paraguay (2).

Lastly, the key findings in each of the data collection processes were compared, to evidence similarities and discrepancies, and to limit biases coming from the researchers and the data collection process itself.

## **B. Desktop Research**

### ***Documentary review of public sources***

Due to the limited understanding of how the CIOF operates and the level of involvement of public institutions at both sides of the border, we first consulted a number of public institutions' websites. Such institutions were selected based on the contextual and institutional knowledge of TEDIC and Data Privacy Brasil's researchers, and based on publicly available news covering the CIOF and its actors. The selected institutions are mainly related to the field of security and intelligence at the national and sub-national levels.

Additionally, and to expand potential findings in the DR, consultation in the search engines of three private and one public media outlets were carried out in Paraguay. Brazil conducted consultation in two known search engines.

The consultation consisted of the combination of different keywords related to the CIOF and the Triple Border Area. A summary of the documentary review is offered in Table 1:

Country	Key-words	Consulted websites	Nº of entries
Brazil	“CIOF” “centro integrado de operações de fronteira” “Paraguai” “Foz do Iguaçu” “Fronteira” “EUA” “Moro” “Fusion Center”	Gov.br, Federal Police, Paraná Civil Police, Ministry of Justice and Public Security, National Congress, Foreign Affairs and National Defence Committee (CREDN for its Portuguese acronyms), Google, DuckDuckGo	57
Paraguay	“CIOF” “Centro Integrado de Operaciones de Frontera” “Foz de Iguazú” “Ciudad del Este” “Frontera”	Ministry of Interior, Ministry of Justice, Ministry of Foreign Affairs, Public Ministry, SENAD, Chamber of Deputies, Chamber of Senators, SILPY (Integrated Legislation System), National Police, Ciudad del Este Municipal Police <sup>2</sup> , Military Force, Ciudad del Este Municipality, ABC Color, Última Hora, La Nación and Agencia IP	37

In the Paraguayan case, the DR was particularly useful to identify public institutions and international cooperation programmes related directly or indirectly with the CIOF. It was also instrumental to identify specific names for interviewees in the Ministry of Interior and the Ministry of Foreign Affairs. Lastly, it was useful to build questions for the FOIA requests.

In the Brazilian case, the DR was also particularly useful for the identification of public institutions and for the identification of gaps regarding the construction and operationalization of the Center, which helped in the formulation of the FOIA requests.

### **Freedom of Access to Information requests (FOIA)**

We organized two rounds of FOIA requests to public institutions related to foreign policy, energy, justice, sub-national administration, and internal-external security. Such institutions were consulted due to their area of activity that relates to the CIOF, as well as some of the findings in the DR that linked directly or indirectly a specific institution or international cooperation program with the CIOF.

<sup>2</sup> The Ciudad del Este Municipal Police doesn't have an official website, but they have a Facebook profile that acts as the “*de facto*” communication channel of the institution. For the purpose of this research, it was decided to include this source for the documentary review.

## **BRAZIL**

The FOIA requests instruments in Brazil<sup>3</sup> were built under three thematic axes:

- International governments' involvement
- Data processing guidelines
- Integration with other security programs

For the first round of requests, we made five FOIA requests to the following institutions: Integrated Operations Secretariat (Seopi), Federal Police (PF), National Penitentiary Department (DEPEN), Ministry of Foreign Affairs, and the Paraná's Secretary of Public Security (SESP). All these institutions are linked to CIOF's functioning. The second round of FOIAs comprised one additional request to the Ministry of Justice and Public Security.

The FOIA requests in the Brazilian case were particularly useful to reveal some aspects about the CIOF's database's functioning, even if the answers did not lay out a very detailed scenario regarding the data collection, treatment and sharing. It also enabled the mapping of some Brazilian stakeholders that operate the center.

You can find a template with all the FOIA requests and its answers in Appendix 1.

## **PARAGUAY**

The FOIA requests instruments in Paraguay were built under four thematic axes:

- Paraguayan government access to the CIOF
- Other international governments' involvement
- Data processing guidelines
- Integration with other security programs

For the first round of requests, a total of seven FOIA requests were made through the Access to Public Information Portal<sup>4</sup> and to the following institutions: Ministry of Interior (TEDIC, 2021d), National Policy (TEDIC, 2021f), Ministry of Foreign Affairs (TEDIC, 2021c), Ministry of Defense (TEDIC, 2021e), Itaipu Binacional (TEDIC, 2021b), Public Ministry (TEDIC, 2021g) and the Civilian Cabinet of the

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<sup>3</sup> In Brazil, FOIAs are carried out based on the Access to Information Law (LAI), which regulates access to information provided for in the Federal Constitution. Articles 10 et seq. of the Law govern the access to information procedure. The access to public information portal can be done through this website: <https://www.gov.br/acessoainformacao/pt-br/falabr>

<sup>4</sup> Access to public information portal: <https://informacionpublica.paraguay.gov.py/>.

Presidency of the Republic (TEDIC, 2021a).

The second round of FOIAs comprised two additional requests to the Public Ministry (TEDIC, 2021h) and as a follow up to some generic answers provided in the first FOIA answer of such institution.

The FOIA requests in the Paraguayan case were particularly useful to confirm potential representation from specific Ministries or agencies. It was also useful for establishing specific access of Paraguayan institutions to the CIOF database, without having an international cooperation agreement.

You can find a template with all the FOIA requests and its answers in Appendix 1

## **INTERVIEWS**

The last data collection process consisted in a total of five interviews conducted with specialized sources from numerous public institutions. Due to the contextual nature of the interviews conducted in Paraguay and Brazil, we designed different scripts for qualitative research and semi-structured interviews. More information on the different interview instruments in Appendix 2.

To maximize the number and scope of answers, anonymity was granted to the different interviewees. A consent form was provided in each of the interviews, with a clear statement of the purpose of the research and the guarantee of anonymity.

<b>Brazil</b>	<b>Paraguay</b>
Three interviews with civil servants from the: <ul style="list-style-type: none"><li>• Government of Paraná</li><li>• Federal Police</li><li>• Civil Police of Paraná</li></ul>	Two interviews <sup>5</sup> with civil servants from the: <ul style="list-style-type: none"><li>• Ministry of Interior</li><li>• Ministry of Foreign Affairs</li></ul>

In the Paraguayan case, the interviews were mainly useful to identify which institutions were specifically invited to join CIOF, and if such invitations were accepted or not. On the other hand, they were very useful to better understand the international cooperation landscape surrounding CIOF, as well as possible integration with other intelligence programs.

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<sup>5</sup> In the case of Paraguay, an interview with the Public Ministry was also planned, but due to time constraints of the institution, it was impossible to fix a date and time.

In the Brazilian case, the first interview was essential to the identification of other potential interviewees, and valuable for filling in the gaps about the political and institutional context of the CIOF's construction, enabling a more narrative approach. The interviews, in general, were also fundamental for displaying the backstage perspective of the public security's agents and institutions on technology, integration and the future of public security in Brazil.

### **C. Report structure**

The main discoveries of the documentary review, FOIA requests, and interviews, as well as the intertwined between them, are offered in the Main Findings section.

There are some differences in the structure presented between both countries' findings:

In the Brazilian case, each of the sources (Document Research, FOIAs and Interviews) not only presented new information about the Center, but complemented each other. That is, they provided for a better understanding and characterization of the CIOF if read together. In this sense, since the main goal of the present research was to better picture and understand the Center in various aspects, it was decided that a better presentation of the information in the Brazilian case was by dividing the "Main Findings" section into CIOF's characteristics, putting together the information collected in the documents, FOIAs and interviews in a narrative structure.

In the Paraguayan case, and due to its involvement with the CIOF only after it was officially launched, the report builds its findings around each of the data collection processes, and how they complement one another. A particular focus on what institutions were invited and the existence or not of legal documents that legitimize potential information and data exchange is prioritized. It was not possible to build a characterization of the CIOF on the Paraguayan side since it is an exclusive policy from Brazil. Thus, complementariness in the findings was sought.

Additionally, and as a way to merge and complement the findings of both countries, a conclusion section analyzing the main similarities and differences is offered.

## CIOF: key features

Inaugurated in December 2019, CIOF is a Brazilian Ministry of Justice and Public Security's project that integrates all public security actors - who previously worked alone - as a permanent task force in order to share and centralize information under one roof (MJSP, 2019), promoting the collection, analysis, production of knowledge and dissemination of relevant information to public security, especially in the border region of Brazil (Governo do Brasil, 2021).

Its goal is to fight against transnational organized crime through the integration between different levels of public security agents, centralizing information (Governo do Brasil, 2021). As explained by Emerson Rodrigues, delegate of the Federal Police, "The center will be the focal point of integration. This joint work will give an idea of unity" (Primeira Linha, 2019). In concrete terms, its idea is to centralize background information on certain people, which is an information that the Civil Police has access to, with cameras from different places where vehicles pass, an information possessed by the Federal Highway Police and by the State Highway Police (Answer to question 6 - Civil Police of Parana).

The physical gathering of agents in the same environment is an important aspect of the CIOF, because as much as technology is important, faster responses come from people physically gathered in the same environment (Answer to question 6 - Civil Police of Parana).

It is located in the municipality of Foz do Iguaçu/PR and physically held within an area of six hundred square meters in the Technological Park of Itaipu. Among other bodies, it counts with the participation of the Federal Police (PF), the Federal Highway Police (PRF), the National Intelligence Agency (Abin), the Ministry of Defense, the Financial Intelligence Unit (UIF - former Coaf), the Federal Revenue, Department of Asset Recovery and International Legal Cooperation (DRCI) and the National Penitentiary Department (Depen) (MJSP, 2019).

The investigations are concentrated in the border areas of Paraná and Mato Grosso do Sul, and with reflection in large urban centers such as São Paulo, Rio de Janeiro, Belo Horizonte, Porto Alegre, Curitiba and other capitals (Polícia Civil do Paraná, 2019). The ostensive operations control command also covers southern Mato Grosso do Sul and Paraná since the radio signals from these areas have been unified and are interoperated (Polícia Civil do Paraná, 2019)

Sergio Moro, former Minister of Justice and Public Security, one of the leaderships of the project, explained that:

"This initiative is inspired by an American experience called the Fusion Center, installed after the attacks of September 11, 2001. 'We created this first in Brazil so that the police and intelligence forces work together. **The databases of all these institutions will be available for investigations, to share experiences**'"

(emphasis added) (Polícia Civil do Paraná, 2019).

Fusion Centers' main mission is to serve as the central point for the “[...] collection, coordination, analysis and dissemination of intelligence to first responders, law enforcement and private sector” (DHS, n.d.). This inspiration was strongly highlighted in all of the conducted Brazilian interviews and in most of the news collected in the desk research stage and further confirmed by some FOIA's answers. Defined in details by the “Considerations for Fusion Center and Emergency Operations Center Coordination - Comprehensive Preparedness Guide (CPG)”:

“The core function of a fusion center is the intelligence process. Simply stated, the intelligence process (or cycle) is an organized process by which information is gathered, assessed and distributed. Following steps in the process: planning and direction, information gathering, processing and collation, analysis and production, dissemination and reevaluation (feedback). Fusion centers engage in this process, regardless of their mission (all-crimes, terrorism or all-hazards), the disciplines or stakeholders they support (law enforcement, fire services, public health, etc.) or the types of information they receive. This process is the means by which raw information becomes a finished intelligence product for use in decision making and formulating policies/actions.” (DHS, DOJ, 2010).

## A. Political and institutional context: the construction of the CIOF

Connecting the material found in the DR with the information from the interviews, this research found out that CIOF is not an isolated effort, but part of a wider public security trend to create and invest in integrated centers and a concrete plan of creating integrated units for combating organized crime, which will have the ostensible work at the borders as a purpose. As stated in the Ministry of Justice and Public Security's (MJSP) Strategic Plan, "Integrated operations units, called Fusion Centers, will be deployed to coordinate overt border police operations and also to manage police investigations through multidisciplinary agencies, composed of different representatives of public security forces" (MJSP, 2019b).

The beginning of this trend precedes CIOF's inauguration and can date back as far as 2016, when the then President of Republic of Brazil, Michel Temer, approved the Integrated Border Protection Program (PIIF) (BRASIL, 2016), indicating the direction towards which Brazilian public security was headed<sup>6</sup>: the integration of Federal Public Administration Units' actions in order to strengthen the prevention, control, inspection and repression of cross-border crimes. Coordinated by the Department of Defense and National Security Affairs and composed by the Brazilian Intelligence Agency (ABIN), the program's main goal is to integrate public security forces and share information among them. (Gabinete de Segurança Institucional, 2020). Legally, this helped to pave the way for the construction of the CIOF.

As mentioned, the main inspirational source for the CIOF were the U.S.' Fusion Centers, a "[...] collaborative effort of two or more agencies that provides resources, expertise and information to the center with the goal of maximizing their ability to detect, prevent, investigate and respond to criminal and terrorist activity" (DHS, DOJ, 2010, p.9). According to the Paraná's Civil Police interviewee, Brazilian public security delegations, accompanied by US delegations, have been visiting some U.S.' Fusion Centers since 2016<sup>7</sup>. All of these visits sowed a seed for the creation of Fusion Centers in Brazil.

For instance, in 2018, the Integrated Center for Public Security Intelligence - Southern Regional (CIISP-Sul), was inaugurated by the Minister of Public Security, Raul Jungmann, in Curitiba, Paraná. It

<sup>6</sup> As stated in their website, PPIF's vision of the future is to be recognized by Brazilian society as a program with governance that promotes integration between agencies, federative entities and neighboring countries and that enhances the role of the Brazilian State in preventing and combating cross-border crimes. (Gabinete de Segurança Institucional, 2020)

<sup>7</sup> Some of the visits this research became aware of were: (i) 2016, a Brazilian public security delegation, due to its good relationship with the American police, headed to Texas, in the United States, to visit and learn from one of their Fusion Centers (Answer to question 4 - Civil Police of Paraná); (ii) From June 22nd to 26th 2019, a Brazilian delegation led by Moro took an unpaid leave to go to the U.S. "[...] to carry out a technical visit to U.S.' institutions". In the license application, Moro makes it clear that the visit's goal was to investigate the functioning of the Fusion Center model institutions (a structure that integrates security forces of different levels, which "[...] receive[s], analyze[s], collect[s] and share[s] information related to threats to national security."), which would inspire the construction and operation of the CIOF. (Ofício n. 1804/2019/AFEPAR/MJ, 2019)



was the first of five regional units meant to be implemented in Brazil to fight organized crime (MJSP, 2018). Other states, such as Rio Grande do Sul and Santa Catarina, were fighting to take the Integrated Center to their territories, which indicates a political alignment around the idea of Integrated Centers (Answer to question 4 - Civil Police of Paraná).

In spite of having a different scope than the CIOF, which focuses on cross-border criminality (Answer to question 3 - Government of Paraná), the CIISP-Sul has a very similar goal: integration between public security agents for the production of strategic knowledge and the integrated access to the contents of the databases of the various institutions and bodies that make up the public security structure (MJSP, 2018). CIISP-Sul began its operations in May 2019, and, according to Sergio Moro, the then Minister of Justice and Public Security, the path to public security involved not only investments, but integration and intelligence:

“We already have thirteen agencies involved in this Integrated Center, and this number should increase, in addition to investment in technology, which has been quite useful in improving the quality and quantity of data available in the field of public safety. **The path to public safety is this. It does need investment of resources, but it needs, above all, integration and optimization of resources.**” (emphasis added) (MJSP, 2019c)

As will be detailed further in this report, the same logic applies to CIOF<sup>8</sup>.

CIOF's institutional kickoff happened on March 25th 2019, when the Ordinance no. 264/2019 was published, establishing a Working Group, within the scope of the Ministry of Justice and Public Security, “[...] with the purpose of examining and formulating a detailed work plan containing the design, budget and schedule for carrying out the proposal for the creation and implementation of the Integrated Center for Border Operations in the Municipality of Foz do Iguaçu/PR (CIOF)” (BRASIL, 2019). The Working Group had the task of submitting the final work report that should contain the description of the activities carried out, the analysis of data and information and, as the case could be, the proposal of referrals.

Although the Ordinance is public - and the National Penitentiary Department's FOIA's answer explicitly mentions it -, when asked about the concluding documents of the Working Group, the Federal Police answered that “after consulting the competent body of this Federal Police, the General Coordi-

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<sup>8</sup> CIISP-Sul has databases and data systems from agencies in the three southern states. It centralizes the analysis and dissemination of data for state secretariats decision-making, producing strategic content for security forces' operations and allows the collection of information of criminal organizations members and the preparation of preventive combat actions to drug trafficking, arms smuggling and reduction of violence. This functioning might give some indications on how the CIOF works, which is not clear from the news on CIOF nor from the FOIA's answers.

nation of International Cooperation - CGCI/PF clarified that it could not report on the matter due to the lack of sufficient data to allow identification of the ordinance in question.”. (Data Privacy Brazil, 2021f). The Ordinance was then attached to the LAI’s appeal<sup>9</sup>, which was not known due to the body’s lack of competence to answer the question.

## **B. Location: Paraná**

As already stated, the CIOF is located in Foz do Iguaçu, Paraná. There are four main reasons for this location, which were revealed by the interviewees.

**Border state:** The first one is the fact that Paraná is a state that borders Paraguay and Argentina. Being a border state facilitates smuggling, the international trafficking of drugs and weapons. As the interviewees stated, it is very difficult for governments to deal with this matter alone, which means that the more help one country can get, the better. Paraná also borders what was called “consumer states”, such as São Paulo, making it a gateway state for drug and weapon trafficking within the national territory. In a nutshell, Paraná is located in an area that enables cross-border crimes. In this sense, CIOF would “help to bring back the feeling of public safety” (Answer to question 4 - Civil Police of Paraná)

**Culture of agency’s integration:** Paraná’s public safety agents already had the culture of working together with one another, in an inter-agency manner, differently from most of the other Brazilian states. One of the interviewees attributed this integration culture to the “need of survival” of the safety agencies in Paraná: “[...] the institutions had to trust each other and work together in order to fight crime successfully, which means that the Federal Police had to communicate with the Civil Police, the Military Police, and so on”.

**Tripartite Command Agreement:** This agreement, born after terrorist attacks in Argentina, legally predicts the sharing of information among the signatory countries, which means that Police from Brazil, Paraguay and Argentina meet regularly to share information. In other words, just as Paraná had an internal culture of agency’s integration, this agreement was responsible for the integration of agencies on an international level. This information is supported by news articles (Primeira Linha, 2019).

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<sup>9</sup> In Brazil, when the response to a LAI request is incomplete or does not correspond to what was asked, there is the possibility of appealing the response, which was done in this case.

**Itaipu:** Itaipu Technological Park (PTI)<sup>10</sup> was an already built structure, which meant no need for buying lands, bids, construction projects, and so on. (Polícia Civil do Paraná, 2019) This came in hand since Sérgio Moro wanted an emergency solution. Itaipu also had interests in the security promised by the Center, a crucial element for the development of the region. The hydroelectric plant contributed with an area of 600 square meters in the PTI – and with the acquisition of technological tools – R\$ 2.9 million were invested by the Itaipu – for the CIOF project. (Parque Tecnológico de Itaipu, 2016)

The fact that Paraná is the second largest tourist destination in Brazil and that it houses the largest Arab community in Brazil was also mentioned by the Federal Police interviewee. (Answer to question 4 - Federal Police)

### **C. Main Goals: axes of action**

CIOF's main goal is to fight organized cross-border crimes by gathering together under one roof the representatives of various agencies in charge of law enforcement (Polícia Civil do Paraná, 2019) to combine their information in order to prevent and, when not possible, to quickly repress criminal activity.

It aims to work as a “command and control office for ostensive operations” (Primeira Linha, 2019), and as “[...] great brain in order to generate information for all of Brazil” (MJSP, 2019). As explained by Delegate Wagner Mesquita, coordinator of the working group for the implementation of the CIOF and general coordinator for Combating Organized Crime at the Ministry of Justice and Public Security, the Center has

“[...] intellectual capacity to generate and share information, direct coordinated actions and expand technological tools with the use of satellites, cameras, sensors, and drones that will stimulate and expand the capacity to fight organized crime, as well as to combat drug and arms trafficking, terrorist financing and money laundering of criminal organizations. [...] Criminal organizations have strengthened and started to use modern logistical resources and, now, the MJSP invests in the adoption of

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**10** Located in Foz do Iguaçu, Itaipu is a Binational Power Plant built in 1966 based on an agreement between ministers of Brazil and Paraguay, in which the two countries committed themselves to studying the use of the hydraulic resources present between the two countries, which until then was a matter of dispute between them. (Pacievitch, 2009). Itaipu Brasil Technological Park (PTI-BR) was built in 2003 by Itaipu and is a scientific and technological hub present in Brazil and Paraguay. The total park covers 116 hectares and stands out for the creation and dissemination of knowledge (Master Ambiental, 2015).

new work methodologies, mainly in the aspects of integrated actions and information sharing.” (MJSP, 2019)

Its crucial element is the centralization of information, so that police and intelligence forces can work together:

“[...] **data from the institutions involved will generate reports** that, from now on, will assist criminal investigations throughout the country, mainly in the Triple Border area, which operates directly in the states of Paraná and Mato Grosso do Sul, and with consequences in the large consumer centers in Rio de Janeiro, São Paulo, Minas Gerais, Porto Alegre and other capitals.” (MJSP, 2019) (emphasis added)

The Federal Police interviewee laid out three main axes of the CIOF's scope: (i) Command and control of offensive operations; (ii) Assistance to the specialized police and (iii) Intelligence: the production of knowledge. (Answer to question 4 - Federal Police)

So far, the demand that has had the most attention was the command and control axe. When organizing an ostensive operation, the CIOF enables public security agents not only to have advanced technological information (for instance, using satellite or drone images) in one adequate command and control room (with representatives from each institution), but to unify all this information in one place in order to facilitate their strategic decisions. The interviewee called this the “classic command and control system”, which, until the CIOF, was not done in the Triple Border Area: “everyone was ostensibly operating at the border and had no command and control tools, not even an interoperated radio.” (Answer to question 4 - Federal Police)

In other words, the command's idea is to: “[...] serve as a tool that will have direct applicability in operations that already take place in border regions, but which still did not have troop placements, online monitoring in the development of operations, due to the disintegrated languages.” (Primeira Linha, 2019).

Nowadays, the CIOF has more than 20 position rooms - which are crisis management rooms - ready to receive information 24 hours a day, where all the law enforcement representatives are gathered and all the collected information is centralized and available to use, subsidizing better decision making.

In order to fulfill its command purpose, the CIOF got authorization from the Army to use one of their war infantry softwares, “Pacificador” - which was used in Rio de Janeiro in 2018, during the

Federal Intervention<sup>11</sup> - to geo-position the military within the *favelas*. As described by the interviewee:

“[...] on an operating table, you saw the operation like a video game: you saw vehicles and the military walking in the field, progressing and controlling the entire operation. It's free software (Pacificador), this Army software, and we managed to make CIOF the first place outside the Army environment to be able to use this technology in command of operations there, of overt operations. Today, there are already trained people, the software is running inside Itaipu.” (Answer to question 4 - Federal Police)

The second axe, assistance to the specialized police, aims to be able to provide information requested by any Police, just as in the work example given by the interviewee: during an investigation, the Federal Police, who needed more information about an individual who had a criminal record within the U.S. Police, asked the DEA for some information - which was possible due to the Federal Police's agreement with the DEA. After a visit to the El Paso Fusion Center, where the case was exposed, the DEA returned with a massive amount of information within a week, collected by different agencies, but presented in a unified manner. “They gathered all the evidence involving the individual, his family, his family's involvement in drug trafficking, the family members' ticket with a photo.” (Answer to question 4 - Federal Police)

This axe has not been directly assessed by the CIOF yet. There is still a need to meet with specialists in all states to be able to show this product and prepare them for future work. Nonetheless, it aims to help the specialized police stations which investigate the performance of suspects inside and outside Brazil. Right now, they do not have the appropriate tools to carry out those investigations. The idea is to be able to create a team in the CIOF - which already exists within the Federal Police structure - for criminal investigations throughout Brazil.

The last axis is intelligence: CIOF integrates intelligence forces in its operations (Polícia Civil do Paraná, 2019). Intelligence means the capability of producing knowledge, collecting information from any relevant source (an informant, a database, open source softwares, etc. (Answer to question 3.a. - Federal Police)), processing it and reporting the information. It is an informational flow: data collection, data fusion and dissemination of information. Intelligence agencies, such as the CIA and ABIN, subsidize decision makers with information. In Brazil's public security case, intelligence informs the

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**11** In February 2018, a Federal Intervention in public security in the State of Rio de Janeiro was decreed by the Decree n. 9.288/18 to combat organized crime in the State and to maintain public order. The federal intervention was agreed with the then governor of the State of Rio de Janeiro, Luiz Fernando Pezão, and the Military Commander of the East, General Walter Souza Braga Netto, was appointed to intervene. During the intervention, the armed forces and the military police acted together. (Rodrigues, 2020)

law enforcers “[...] where the social movements are or how any terrorist organization is doing, if there is any transfer of money from organizations” (Answer to question 3.a. - Federal Police). In other words, the intelligence produced by the CIOF guides security operations and is directed towards specialized agents, who will thereby act. The CIOF’s aim is not only to produce intelligence, but also to centralize it and exchange it regularly, disseminating it<sup>12</sup>:

“It is this centralized information that allows the execution of actions. The databases of institutions affecting the generation of reports, from now on, will assist criminal investigations across the country, mainly in the area of the Triple Border, which act directly in the states of Paraná and Mato Grosso do Sul, and with consequences in the large consumer centers in Rio de Janeiro, São Paulo, Minas Gerais, Porto Alegre and other capitals.” (MJSP, 2019)

#### **D. CIOFs database operationalization**

One of the main challenges of this research was to understand the operationalization of the Center’s database, since there was not so much information available about how it worked, especially regarding the participating agencies’ functions within the Center. Most of the news regarding the Center had to do with its inauguration and some operations the Center has assisted<sup>13</sup>. The FOIA requests were thus crucial in this part of the research.

From the information the research was able to gather, the Center’s project was conceived and developed within the scope of the Directorate of Operations of the Secretariat for Integrated Operations (Data Privacy Brasil, 2021b)<sup>14</sup>. The CIOF’s database is under the Seopi’s responsibility and is reported

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**12** One example given was the exchange of knowledge between the Federal Revenue and the Police, in which the Revenue notices, at São Paulo’s airport, that a suitcase that arrived has the characteristic of storing drugs. The Revenue, then, reports the details of the situation and, in 48h, everyone will be aware, enabling the Federal Police to better approach the individual who owns the suitcase.

**13** To mention some of them: (MJSP, 2020); (MJSP, 2020a); (MJSP, 2021) (MJSP, 2020b); (MJSP, 2021a) and (MJSP, 2021b). Although, two of three interviewees stated that it is hard to know for sure the exact positive results that came from the CIOF due to strategic reasons (you do not disclose what comes from the center) and legal reasons (you cannot report, for instance, a phone intercept in the media) - although, it was mentioned that the increase in drug seizures in Paraná today has, at some point, the role of the Integrated Centers, because quality information is produced there.

**14** Secretariat of Integrated Operations (Seopi) is a superior public body at the federal level, linked to the Ministry of Justice and Public Security (MJSP), whose focus is the integration of Brazilian federal and state police forces in the fight against organized crime. (Vilela, P. R., 2018) It was instituted in January 2019, through article 2 of Decree 9.662 (BRASIL 2019a). Its creation was announced as a measure to improve the national coordination of police activities in each state. (CRUZ, 2020). Seopi has a troubled history. In addition to the tender for contracting spy software (Pegasus), in 2020, Seopi produced, at the request of the Ministry of Justice and Public Security, a report entitled “Actions of Antifa Groups and Anti-Fascism Police”, presented in the first half of June 2020. The report was then sent to various public administration bodies, members of the Brazilian Intelligence System (SISBIN). (VALENTE, 2020)

directly to the Operations Directorate of the MJSP (Data Privacy Brasil, 2021). The decision of which people will have their data collected in order to integrate the CIOF's database was stated as confidential information, but it was reported that the data analysis is carried out on demand by institutions in the area of public safety (Data Privacy Brasil, 2021).

Despite the fact that there was no information available regarding which type of data treatment is held in the CIOF, the MJSP answered that the algorithm's conclusions go through human reviews. (Data Privacy Brasil, 2021) Even though not all information about the data treatment was shared, this is the first time the authorities affirmed that the CIOF's data treatment goes through an automated process. It is not publicly available which algorithm is used.

The sharing of data held by the CIOF with outside institutions - which is, technically, a case of data interoperability (Data Privacy Brasil, 2021)- happens when requested and only data related to criminal activities are shared. It is not possible to be sure which institutions can request such data, since the FOIA answer was vague. Nonetheless, it is certain that Federal Highway Police, National Intelligence Agency, Ministry of Defense, Financial Intelligence Unit, Federal Revenue, Military Police, Civil Police and Scientific Police are authorized to do so. (Data Privacy Brasil, 2021)

The purpose of this data sharing is to repress and prevent criminal activities. Although the MJSP stated that the period in which the collected data remains in the CIOF's database was confidential information, one of the interviewees declared that collected data is not erased, since the general concept of Fusion Centers is precisely being a "pool of information": "[...] you throw everything into the pool of information, coming from various data, and then process it, generating reports for whom it might interest" (Answer to question 8 - Federal Police). When the MJSP came across the question regarding what is the administrative act that defines / regulates the collection and processing of these data, it stated "no answer" (Data Privacy Brasil, 2021)

Moreover, the MJSP declared that the CIOF's database is restricted to the Center and not integrated with other existing security and migration programs in the Tri-Border area, such as VIGIA (Data Privacy Brasil, 2021), which could imply that it is also not integrated with the Tripartite Command. The database is also not Integrated Center for Regional Public Security Intelligence - Southeast, in São Paulo. But if requested, the information can be shared (Data Privacy Brasil, 2021),, since "CIOF will have an exclusive communication and service channel for public agents from the various units operating within the scope of Operation Horus, of the National Border and Border Security Program (VIGIA), supporting police officers through consultations with banks in data from people and vehicles from several states in Brazil." (Governo do Brasil, 2021)

Within a brief research about the North-American Fusion Centers, it was possible to find the "Fusion Center Privacy Policy Development", a workbook destined to "[...] assist center personnel in developing a privacy policy related to the information the center collects, receives, maintains, archives, accesses, and discloses [...]" (DHS, DOJ. 2010a) in the light of gaps in the rules that prescribe what and

how information can be collected, used, maintained (including storage, review, and validation/purge) and shared. Also, the 8th guideline from the “Fusion Center Guidelines: Developing and Sharing Information and Intelligence in a New Era”<sup>15</sup> addresses privacy issues, acknowledging “[...] the need to ensure that constitutional rights, civil liberties, civil rights, and privacy are protected throughout the intelligence process [...]” balancing the “[...] law enforcement’s ability to share information with the rights of citizens, appropriate privacy and civil liberties policies must be in place.” (DHS, DOJ 2006)

Some Fusion Centers have their own privacy policy documents, such as MATRIX (El Paso, 2011), a “US Department of Homeland (DHS), and the State of Texas recognized Fusion Center, working in conjunction with other fusion centers in Texas and throughout the US to detect, prevent and interrupt crime and terrorism.” (MATRIX, s.d.) As stated in their website, the privacy policy is approved by the Department of Homeland Security (DHS) as a mandatory component for the recognition of the Center.

Although CIOF is inspired in U.S.’ Fusion Centers, Brazil does not have any type of guidelines addressing legal privacy issues regarding Fusion Centers’ operation and the CIOF also does not have a privacy policy document. When asked via FOIA request why there wasn’t such a document, if it would be formulated and, if not, why, the Federal Police did not address the question. (Data Privacy Brasil, 2021c)

## **E. International Cooperation**

From the DR, this research was able to gather information regarding the U.S.’ presence in the process of CIOF’s construction and the idea of expanding the Center’s communication capacity to other international authorities. In this sense, some of the FOIAs requests and some of the questions from the interviews had the purpose of finding out the degree of other government’s participation in the CIOF and if information from the Center’s database was shared with other international authorities. As will be detailed in the following paragraphs, there is indeed an intention of cooperating with other governments, as demonstrated by the agreements with the U.S.’ public security agencies, as well as by the statements of agents involved with the CIOF. Nonetheless, it seems that the CIOF’s operationalization is restricted to Brazilian authorities.

Although the Center is inspired by U.S. models - and its approval and construction happened after the aforementioned visits to Washington and El Paso in order to better understand their functioning -, according to the MJSP’s FOIA’s answers, “nothing was provided to Brazilian authorities by the Government of the United States of America. The creation of the CIOF involved only an agreement

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**15** Guidelines established by members of the U.S. Department of Justice’s (DOJ) Global Justice Information Sharing Initiative’s (Global) and DHS’s Homeland Security Advisory Council (HSAC) in collaboration with numerous law enforcement experts and practitioners from local, state, tribal, and federal agencies, as well as representatives of public safety and private sector entities across the country to address the lack of standards for fusion centers to develop common capabilities and processes for information sharing. (DOJ, DHS, 2006)



with Itaipu Binacional, which promoted the adaptation of physical space and the purchase of equipment (computer and furniture)". (Data Privacy Brasil, 2021).

When asked if there was any involvement or consultation with any international governments regarding the implementation, operationalization and management of the CIOF, the MJSP answered that it was "not possible to answer this question", "since the creators of the Center (Minister of Justice, Secretary of Integrated Operations and other Coordinators) are no longer part of the current administration" (Data Privacy Brasil, 2021). Yet it was stated that there is no international government involved in the CIOF's technical data sharing and treatment decisions, according to MJSP and Seopi.

The MJSP stated that no data is shared with U.S.' databases and that their cooperation is punctual (Data Privacy Brasil, 2021) - the aforementioned support provided by the US government in locating a Brazilian fugitive from justice who resided in the US is an example (Answer to question 4 - Federal Police).

In March 2019 the Ministry of Justice and Public Security signed institutional cooperation agreements with the Federal Investigation Agency, the FBI, and with the DHS (MJSP, 2019a). "[T]he purpose of the documents is the sharing of information on criminal and terrorist groups with a view to combating transnational organized crime." (MJSP, 2019a). This agreement provides for the exchange of fingerprint identifying information in criminal investigations. When asked where the agreement could be found, through a FOIA question, the Federal Police answered that:

"The instruments of agreement in question contain tools used in defense of society, so that their dissemination would enable criminals to gain knowledge to reach them, with the aggravation of weakening not only national security, but also that of the signatory foreign country, which was not consulted on the publication of these terms of cooperation. Thus, any publicity could generate a lack of confidence in signatory countries to enter into agreements with Brazil in view of the possibility of seeing their lines of action to combat terrorism, drug trafficking, international criminal organizations, etc., unduly exposed. For no other reason, these agreements are not published, when signed, in their entirety, but only an extract. This measure is also intended not only to protect the information, but also to meet the requirement that is usually formulated by the signatory country, namely, the non-publication of the signed agreement. In view of the foregoing, due to unreasonableness and because the requested documents contain information with restricted

access, its disclosure is not possible.” (LAI, Federal Police, 2021)<sup>16</sup>

After the Brazilian delegation visited the El Paso Intelligence Center (EPIC), which has a dozen FBI agents to monitor the United States’ border with Mexico, Moro announced that he would permanently assign a Federal Police delegate to operate at the US intelligence center, expanding the exchange of information. (VIANA, 2020)

In June 2019, the General Director of the Federal Police signed an inter-institutional Cooperation Agreement with the Drug Enforcement Administration (DEA) El Paso Intelligence Center (BRASIL, 2019b). The provision is for voluntary sharing of police information through established procedures and guidelines. When asked via FOIA request where the agreement could be found, the Federal Police gave the exact same answer as when asked about the agreement between MJSP, the FBI, and the DHS - which means the access to the full document was denied due to security reasons.

Due to these agreements, with the purpose of trying to better understand the U.S.’ cooperation with the CIOF, one of the FOIA’s to MJSP asked if the U.S. had jurisdiction in Brazil or in Paraguay, to which MJSP replied that this was not an applicable question.

A United Kingdom agency - not specified within the news report - also contacted the CIOF, which is important because of the international movement of drugs (Polícia Civil do Paraná, 2019). Due to the aforementioned agreements between Brazil and the FBI, one of the FOIA questions asked if the relationship between Brazilian Public Security Ministry and the FBI was unprecedented, to which MJSP and Seopi answered that it did not apply to the CIOF’s case.

Although the Federal Police interviewee did not know if it was already working, they stated that Argentina was finalizing the implementation of its own Fusion Center, which would create a direct communication channel with the CIOF. Brazil has also established a cooperation agreement with Paraguay, Bolivia, Peru and Colombia for the CIOF’s activities (Polícia Civil do Paraná, 2019). The interviewee implied that this is the natural movement of the Center: to multiply and connect, which is backed up by the DR finding’s. (Polícia Civil do Paraná, 2019)

In relation to the sharing of information with Paraguay, there were already some advances regarding the authorization for Paraguayan immigration officials inside the CIOF, but that was all the interviewee mentioned. The other interviewee, nonetheless, highlighted the importance of having a close relationship with the authorities of other countries in order to have quick responses, specially in a Border Center. Sometimes those relationships are even informal ones, because excessive formality in a case like this will stifle the work for both sides: “[...] that is, this personal negotiation with the Paraguayan authorities to get the quickest answers [...] because sometimes excessive formalism can stifle the

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<sup>16</sup> Despite the Federal Police’s answer, the appeal stated that the agreement was already public in (Viana, N. (2020)

Center's efficiency".

## **F. Future Predictions**

The Brazilian interviewees all see the CIOF's model and technology as an efficiency advance within the public safety department, which is welcome in a country of continental dimensions (approximately 17.000 km) with budget limitations. In their view, technology helps optimize the personnel in public security - for instance, it provides the means for remote interrogation (which, according to one of the interviewees, even if it raises concerns about its legality, there is no other way to do this nowadays).

The Paraná's Civil Police interviewee claimed that in the future it should be possible to have one single police force, which unites preventive and investigative police - and stated this was allowed by the Brazilian Constitution, without any specific mention to its articles or sections. This indicates an intention not only of creating more Fusion Centers in different states, but of broadening the CIOF's logic to the Public Security field as a whole. It was also mentioned the intention of developing Fusion Centers for different scopes, such as the creation of a Fusion Center to fight environmental crimes. The important thing, according to the interviewee, is to spread the CIOF's culture for investigations in general.

Moreover, all of the interviewees were enthusiastic about public safety technologies designed by private companies. To illustrate the reason why, one of them mentioned that Paraná's government was establishing a new program, "Olho Vivo", located in the Public Security State Ministry, which required a robust amount of cameras with face recognition and license plate reading capabilities. The government was prepared to spend approximately forty million reais in the acquisition of cameras and storage memory. Nonetheless, the acquisition plan was abandoned, because, by using the CIOF's logic, there was a perception that it would be inefficient for the state: in addition to the expenses in maintaining services, they realized that the State was not interested in the cameras themselves, but in the information that comes from the camera's collected data. This means the most efficient model was to lease the cameras, as the obligation to keep them up to date would then belong to the private entrepreneur.

At that point, there was a talk with Celepar<sup>17</sup>, a technology company, and the government decided to change its focus: instead of spending the budget on buying the cameras, it would be invested in processing the data that comes from the leased cameras, creating a "mega processing structure", a "pool of information". This led to the government receiving a series of data sources offers from startup companies and municipal management companies for the Olho Vivo project. The interviewee added that this logic fits not only within facial recognition technologies, but in biometrics, reading cars' plates on the roads, and so on.

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<sup>17</sup> <https://www.celepar.pr.gov.br>



## A. Desktop research

### **Documentary review**

#### *Context information*

The main usefulness of the DR was to provide the research with information that linked public institutions and international cooperation programmes directly or indirectly with CIOF and different initiatives in the Triple Border Area. It also provided important contextual information to understand the current securitization and intelligence trends in such area.

Concretely, the DR showcases that CIOF comes to reinforce the strengthening of Foz do Iguacu as an important intelligence centre for the Triple Border Area, with a particular perspective from Brazil and for the fight of drug trafficking, arms, medicines and smuggling (Ultima Hora, 2020).

Moreover, the documentary review showcases a number of monitoring and intelligence programmes co-existing in the area, such as the Federal Police Intelligence Center, the Frontera Tech program (Ultima Hora, 2021), Tripartite Command (Mereles, 2019a), Bipartite Command (Ministerio de Relaciones Exteriores, 2020) and the VIGIA program<sup>18</sup> (Ministerio de Relaciones Exteriores, 2021a).

On the other hand, the invitation for Paraguay to nominate a permanent focal point in CIOF was officially extended in 2020, during a high-level visit of Brazil's Chancellor in Paraguay (La Nación, 2020a). The relevance of the invitation was framed in the importance of security, defence and combating transnational crimes.

It would appear that inter-cooperation agreements between different police bodies is a trend that will escalate in time, with a particular focus on the creation of shared databases. The DR found a cooperation agreement signed in November 2019 and between ministries of Interior, Security, Justice and national police authorities of MERCOSUR, to support police forces in the fight against all types of crime. The agreement aims to enhance technical support through the exchange of information methodologies and technology, training and the execution of joint investigations, operations and proceedings in border areas (Mereles, 2019b). One month later, the CIOF was officially inaugurated (La Nacion, 2019).

However, such integration and digitization of the security process is not exempt from opposing views. The DR identified a news outlet covering both the inauguration of the CIOF and the installation of facial recognition cameras in the triple border area. Such news also reported voices of concern on the

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<sup>18</sup> Acronym for Programa Nacional de Segurança nas Fronteiras e Divisas in portuguese.

part of the business community in Ciudad del Este, and the effects that this type of system can have on the flow of people who come to the area (La Nacion, 2019).

### ***National and international stakeholders***

The DR references two specific institutions that could be directly linked to conversations with CIOF. First, the then Head of the Civilian Cabinet of the Presidency of the Republic stated the importance of the invitation to join CIOF, noting that:

“It is not only about receiving information from one side or the other, why not? We would also have the right to analyse the information together with them, as well as the source of the information” (La Nación, 2020b).

Secondly, the high level visit of Brazil’s Chancellor was hosted by its Paraguayan counterpart. Notably, an invitation to join CIOF was extended in this visit (La Nación, 2020a). It is also important to highlight the positive perception of the Paraguayan Minister of Foreign Affairs in this visit, and in regards to the collaboration between the governments of Paraguay and Brazil for the fight against transnational crime. Also its positive assessment of the results of the Tripartite Command in the Triple Border, and lastly, the joint agreement to form a Bipartite Command in Pedro Juan Caballero and Ponta Porá (Ministerio de Relaciones Exteriores, 2020).

On the other hand, a more indirect link between the Ministry of Foreign Affairs and CIOF is identified, through the EUROFRONT program. Such is a cooperation program financed by the European Union, whose goal is to encourage dialogue between authorities involved in border management, and to facilitate the exchange of information between national authorities. A particular attention in technological training at border posts is mentioned (Ministerio de Relaciones Exteriores, 2021a).

The program made a visit last year to the Triple Border area, where they held meetings with several security actors at both sides of the border, where they visited the CIOF and Tripartite Command. The visit also announced a field study that is conducting an analysis of the performance of border posts in the area and with the relevant institutions (Ministerio de Relaciones Exteriores, 2021b).

The DR also identified evidence of cooperation between the Public Ministry and CIOF. Concretely, in the framework of a raid to capture a drug trafficking leader, a press note published in said ministry website mentions that Brazil opened to the Public Ministry the possibility of working jointly with the CIOF to combat terrorism, organized crime and drug trafficking (Ministerio Público, 2020).

The DR did not find other institutions that were directly or indirectly mentioned or linked to CIOF. However, institutional press notes linking the Ministry of Interior and the National Police with the Tripartite Command were also found (Ministerio del Interior, 2021). Due to their institutional relevance in security matters, such institutions were also included in the FOIA request section, along with the other identified institutions already mentioned above.

**B. FOIA requests**

The FOIA requests were designed to further deepen some of the findings of the DR. Concretely, a better understanding of the Ministry of Foreign Affairs, the Civilian Cabinet of the Presidency of the Republic and Public Ministry with CIOF was explored. Additionally, a better understanding of the link between the EUROFRONT programme and CIOF was also explored.

Moreover, and although the review did not find direct links between some public institutions and CIOF, the research still conducted FOIA requests and based on the importance of such institutions in intelligence and security operations. Concretely the Ministry of Interior, Ministry of Defense and the SENAD. Itaipu Binacional (Paraguayan delegation) was also included due to the geographical location of CIOF. Table 2 offers a summary of the main findings in this section..

Axe 1	Axe 2	Axe 3	Axe 4
Paraguayan government access to CIOF	Other International governments involvement	Data processing guidelines	Integration with other security programs

Main findings
<p><b>Institution: Ministry of Interior</b></p> <p>The response makes no reference to an invitation to nominate a representative to join CIOF. It also affirms that there is no state police officer or another institution [from Paraguay] with a permanent presence before the CIOF (TEDIC, 2021d).</p>
<p><b>Institution: National Police</b></p> <p>The response only makes reference to axe 4.</p> <p>It mentions specifically the Tripartite Command and its validity since 1996, highlighting the need for its existence to generate strategic actions to face the problem of organized crime and to develop cooperation measures for security and information exchange. It then states that there are no agreements and conventions between the Tripartite Command/ Paraguayan Delegation and the CIOF (TEDIC, 2021f).</p>

## Main findings

### **Institution: Ministry of Foreign Affairs**

The response makes references to axes 1 and 2.

In relation to axe 1, it clarifies that to date there is no cooperation agreement between Brazil and Paraguay for CIOF. It also points out that since there is no specific cooperation agreement, such a Ministry is unaware of the participation of other institutions within CIOF. They then go on to clarify that participation could take place in the framework of bilateral agreements between institutions, which do not have a binding character, nor do they generate responsibilities for the parties. Lastly, they clarify that they conducted informal inquiries and confirm that no Paraguayan institution is represented at the moment in CIOF (TEDIC, 2021c).

In relation to axe 2, it indirectly denies any knowledge of involvement of foreign governments/programmes with CIOF, clarifying that said center is a dependency of the Government of the Federative Republic of Brazil, whose operation and composition is determined by the legislation of said country (TEDIC, 2021c).

### **Institution: Public Ministry**

A first response, in reference to axis 1, was prepared by the Directorate of International Affairs and Internal Legal Assistance of the Public Ministry, stating that such a Ministry is not part of the CIOF (TEDIC, 2021g).

However, the research conducted a second FOIA request and referencing directly the Public Ministry press note mentioned in the DR and its cooperation with CIOF. The second response, prepared by the Communication and Press Department, states that CIOF is a cooperation-oriented agency with Brazilian and also Paraguayan institutions. And for the exchange of strategic information without the need of a formal invitation or request for cooperation through a formal channel (TEDIC, 2021h).

The second response also points out that the spontaneous exchange of information is vital to optimize tasks and fight against transnational crime (TEDIC, 2021h).

### **Institution: Itaipu Binacional**

The response makes reference to axe 1, stating that the Itaipu Binacional- Paraguay side has not received any formal invitation to join CIOF, and that the Center is managed by the PTI Brasil Foundation, where the Paraguayan margin has no intervention to date. (TEDIC, 2021b).

### **Institution: Ministry of National Defense**

The response points out that the Ministry of Defense has no information about the existence of a cooperation agreement with CIOF (TEDIC, 2021e). Said Ministry also referred the consultation to the Military Forces Command, who also gave a similar response, denying any type of cooperation agreement with CIOF (TEDIC, 2021e).



## Main findings

### **Institution: Civilian Cabinet of the Presidency of the Republic**

The response of this Cabinet fully adhered to those of the Ministry of Interior and Ministry of Foreign Affairs. They particularly highlighted that to date, there is no specific cooperation agreement between Brazil and Paraguay regarding said center (TEDIC, 2021a).

## C. Interviews

The final data collection stage showcases a number of findings around the Paraguayan institutional involvement in CIOF. Namely that of institutions invited to join the center. It also evidenced an international interest in the Triple Border area, and translated in the form of international cooperation programs that relate directly or indirectly with CIOF.

Two officials from the Ministry of Interior and Ministry of Foreign Affairs provided the research with valuable insights to further deepen some of the findings of the DR and FOIA data collection process.

The interview templates are available in Appendix 2.

### *Paraguayan institutions invited to join CIOF*

The interview with the Ministry of Interior representative showcases that there was an invitation extended to such Ministry to join CIOF. The document was explicit in regards to what CIOF is. The interviewee also highlights that integrated centers such as CIOF are the trend to come.

The formal invitation to participate came from Brazil to the ministry, the whole concept note was anticipated, what it consists of, we are very aware of that. But it is not something new, that is a trend. Brazil is the first to get ahead, perhaps. But that's going to be a trend. Brazil is ahead because it has long-term policies. In other words, Brazil is already making visible what is coming (Answer to question 2.B- Ministry of Interior)

This model from Brazil is a model that was launched years ago, but could not be implemented. Now, with this government it was implemented for the first time. They have... I don't know how it originated, but we have always known that it was going to come about. What's more, the idea is to transnationalize that

one day, that is the idea (Answer to question 2.B- Ministry of Interior)

Moreover, it is apparent that representatives from the Ministry of Interior even participated in the opening of the Center in 2019.

The center opened at a MERCOSUR meeting. It must have been in December 2019, if I remember correctly. Precisely, that time the MERCOSUR meeting was held on the Brazilian side of Itaipu. We all stayed at the hotel in Foz do Iguaçu. It was the last face-to-face meeting we had, then all the meetings were online [...] And that time we did it at the Itaipú Binacional facilities, within its technology park, and the opening of the operations center was there (Answer to question 2.B- Ministry of Interior).

On the other hand, it would appear that not much has been done with such an invitation, according to both interviewees.

The invitation went through several departments as well. At the opening of what it was, with the conceptual note of what it is and what it intends. But there was no involvement (Answer to question 2.F- Ministry of Interior).

In conversations with the Interior Ministry we had an affirmative answer, we received it, but not much was done with that because the current system works (Answer to question 2.B- Ministry of Foreign Affairs).

In relation to the above, the answer of the Ministry of Foreign Affairs particularly stands out. By system, it appears the interviewee describes a connection between the Tripartite Command and the CIOF. It argues that such connection makes Paraguayan authorities consider it unnecessary to nominate representatives within CIOF.

Yes, we do know the CIOF. Yes, there is a collaboration, but not integrated, that is, Paraguay is not part of the CIOF. However, it collaborates with the CIOF through the tripartite command. The tripartite command is a police alliance that integrates the three border countries, Paraguay, Argentina, and Brazil, through which all types of cooperation are managed, including the information that the CIOF needs. So, whenever they

need something, they ask the Brazilian side of the tripartite command, the tripartite command distributes the request and our segment of the tripartite command makes the consultation to whoever corresponds (Answer to question 2.a- Ministry of Foreign Affairs).

On the other hand, the interview with the Ministry of Foreign Affairs also points to an apparent invitation for the National Police and the SENAD office to join the center

We were invited on different occasions, not the Paraguayan State, only the police department and the SENAD, to assess if they were interested in collaborating more closely with that (Answer to question 2.a- Ministry of Foreign Affairs).

Lastly, the interview with the Ministry of Foreign Affairs reconfirms that aside from the invitations to join CIOF, not much has been done with them. Additionally, it points out to the problems of having different invitations forwarded between institutions that don't necessarily follow international public law checks and balances

Yes, when we receive this type of initiative, we review it in general, to assess if it corresponds, if there is no transfer of sovereignty, if it corresponds to the interests of the republic, if there are no foreign policy problems with the corresponding country (Answer to question 2.a- Ministry of Foreign Affairs).

When the Ministers met, it was loudly said that there was an interest. Which happens a lot. Now, the ministers meet a lot, what we call the "executive diplomacy". The Minister of Women meets the Minister of another country and so on. Something that diversifies our work too much. We have to be attentive to what all the ministers and all the national secretariats do, which are fifty-four. And it makes monitoring a little difficult, particularly for a single institution, which to top it all is quite small, right. So, the answer I can give you is, the Ministry of Foreign Affairs should have received that invitation. If the Brazilian State had behaved as it should. The fact that it did not happen might specifically mean that we are losing something in the process. Because the only international interlocutor of the Paraguayan State is the national chancellery. There is no other. So, having said that, usually when we see that there is a good opportunity, we try

not to stop the process, but yes, integrate into the process as it should be. And that is where we stand now with this issue. Since we took notice, particularly from your request, then we began to network and so on. I am at ease since there was not much movement, meaning the movement is elsewhere (Answer to question 2.b- Ministry of Foreign Affairs).

### ***International cooperation actors linked to CIOF***

The interviews point out the interest of the European Union for the implementation of Integrated Centers such as CIOF in Paraguay and also the region. Two specific programs stand out according to the interviews: “El PACTO” and “EUROFRONT”.

Yes, I know it. In reality, the CIOF is a European model. They are called Integrated Border Operations Centers. In Europe it has been used a lot for years. In fact, we collaborated here with a program called EL PACTO, which wanted to implement these models [...] EL PACTO. “EL” means “Europe to Latin America”. And “PACTO” means “Program of [I don’t remember] Against Transnational Organized Crime. It is a 5-year program; It started in 2017 and is ending in mid-2023. We worked with them, and they went into various lines. They also brought several models, for example we met the working models, the joint investigation force, Task Force is called. Here we call it “multidisciplinary teams” specialized from various institutions for a research team. We are in the process of forming one. They also brought a model of an European council that analyzes the regional threat of the entire European Union. They also wanted to implement that system here. And the others are the Border Operation Centers. There are three working models they wanted to implement: multidisciplinary investigation teams, integrated border centers, and a higher center, a regional security council (Answer to question 2.a- Ministry of Interior).

First let me tell you that the EUROFRONT program is one of the programs that we have with the European Union, Paraguay is the second largest cooperation recipient with the European Union, and in the security segment, we have EUROFRONT, COPOLAD and EL PACTO, that are three specific security

programs. EUROFRONT's main objective is to strengthen border control, or border control systems and adapt them first at the subregional level, and then at the level where both regions can share the data in a precise way. (Answer to question 3.a- Ministry of Foreign Affairs).

Moreover, the interview with the Ministry of Foreign Affairs also points out that the EUROFRONT program has other components in Argentina and Brazil, and that it is part of a master plan program to integrate how border control and its data is collected both in the Triple Border Area and in the European Union.

So, in a safe and timely manner, a European citizen in the region, a citizen of the triple border (Paraguay, Brazil, and Argentina), or a citizen of MERCOSUR, can have integrated controls. If they control you there, here you already have an input response, you know where you move and so on. The idea is for us to be capable of acting with the same security and with the same freedoms for that purpose, because the European Union has many freedoms (Answer to question 3.a- Ministry of Foreign Affairs).

I do not know if it helps, but I do know that the CIOF is integrated into the system that they are proposing to Brazil. What they are doing here, they are also doing it in Argentina and Brazil. Particularly, we are the most advanced with EUROFRONT, followed by Brazil [...] There is a tripartite commitment, and of course EUROFRONT Paraguay has to talk with EUROFRONT Brazil to see what they are doing. And I am aware that EUROFRONT Brazil did the same, they met with all the relevant authorities, both police and judicial, as well as investigative. There they also perform data surveys to see the difference between Paraguay and Brazilian legislation and vice versa. Of course this is public to us, we also know what they are seeing (Answer to question 3.b- Ministry of Foreign Affairs).

It is interesting to point out that this notion of integrated control could be linked to the apparent necessity that particularly the Ministry of Interior identifies and in regards to eliminating the notion of borders, both in terms of data and intelligence exchange, as well as actual police border crossing.

The data connotation is losing the concept of "border". The concept of borders is lost. That is the greatest stumbling block

we face as we are sometimes jealous to share our data, when in fact, sharing data is what will nurture and provide greater strength to the fight against crime. That is the biggest stumbling block. For everything we do, our main problem is sharing data. When we make any agreement, any operation, sharing data is the most sensitive issue. And when we talk about sharing data, we talk about technologies (Answer to question 1.a- Ministry of Interior).

In MERCOSUR I think it was last year. A macro agreement was approved, which has been discussed for a long time, so that the police can pass to the other side of the border. Up to certain limits, with certain restrictions, of course. Because, what do criminals do? Just as they do in Pedro Juan Caballero: they kill someone on one border and run to the other border, then tell the Paraguayan police that they can not cross it. Therefore it is an effort to minimize that tool they have that allows that. To be able to do certain persecution, under certain conditions, right. But everything points to tearing down that border. That border causes plenty of problems in our job. Many problems. And it is a shield for criminals. Just as technology is breaking down borders, and criminals take advantage of that, we continue to maintain formal borders which makes our work very difficult. And we need to tear that down (Answer to question 2.b- Ministry of Interior).

### ***Importance of privacy and data protection in security programs***

There are some discrepancies between the perceptions of the interviewees and in relation to the importance of privacy and data protection in security policies. This is particularly important since the process of invitation to Paraguayan authorities to join CIOF did not necessarily follow international public law due processes, and thus, excluded also the checks and balances mentioned by the Ministry of Foreign Affairs in the invitation section.

In the case of the Ministry of Interior interviewee, it would appear that a trade-off between privacy and security is inescapable

I'm going to tell you my opinion. Those factors are always analyzed, but a decision must always be made for a greater good.

So, choosing a greater good sometimes means sacrifices. You can not have everything, in order to get one thing you have to sacrifice another, unfortunately, and that's my very personal opinion [...] Much has been said about the right to privacy, but the entire population is connected to Google, and similar platforms that are watching you all day long. At the end of the month they send you "look, you were in such a city, such a part. It tells you your journey. I mean, they are spying on you all day. And yourself, when you download WhatsApp, you join a cafe, Facebook, you have a Google account, and they tell you privacy terms there. You never read, but you still accept it, right? You are implicitly agreeing to be tracked. Why are you going to refuse so much when the State wants to do it?. The State tries to ensure your safety, and the others try to do it to sell you things (Answer to question 1.b- Ministry of Interior).

It is reasonable to say that such perception coupled with an apparent lack of transparency in how public institutions on both sides of the border communicate and send out invitations could, at the very least, have a negative impact in the way human rights impact assessment or other methodologies are even practiced.

On the other hand, the Ministry of Foreign affairs interviewee is adamant about the compliance of privacy and human rights for any agreement that is signed by the Paraguayan state. However, and in the case of data protection, enforcement is quite a problematic issue, due to the lack of a personal data protection authority in Paraguay.

The first answer is one hundred percent in all cases. Now, if we have to dig deeper, the answer becomes a little more difficult to implement. Why? Because we can do a check, but of course we are not the authority that is going to assure that that happens there. Here I have to refer to the initiative that we all share the Personal Data Protection law that is still under study but that would help a lot, as an example. Now, having said that, Paraguay is a member of all international Human Rights agreements, it has to protect Article 19, Article 17, it has to protect privacy, people's identity, it has to ensure freedom. Although nowadays there is not a precise competent authority, such it should be that one created by the Data Protection law [...] All international agreements and every union in Paraguay, any mechanism, has to protect people's data, their freedom, their identity and the

presumption of innocence, in addition to all human rights. That is above anything, and as you know, international agreements are above national law. So even if we have an agreement with MERCOSUR, it does not measure up to a human rights agreement that is applicable to Paraguay. (Answer to question 2.F- Ministry of Foreign Affairs).

Lastly, and according to the Ministry of Foreign Affairs interviewee, for the particular case of CIOF, the enquiries around the matter have not been carried out, since not much has been done with the invitations as already pointed out. In due time, and if a particular institution accepts such invitation, necessary enquiries will be made.

We will eventually do it as we did with other institutions if we really want to join in the protection of data generated by Paraguayans. But in the first instance the answer is no. Now, the necessary consultations will be made if applicable, because we have to know the type of treatment and the type of security the data that we generate as a State will have, and that will allow subsequent joint work. Paraguayan citizens, data on Paraguayan citizens, a database that can be integrated, everything has to be well protected, both technically and legally, in the sense of how they are going to use the data we are going to provide them with (Answer to question 2.D- Ministry of Foreign Affairs).



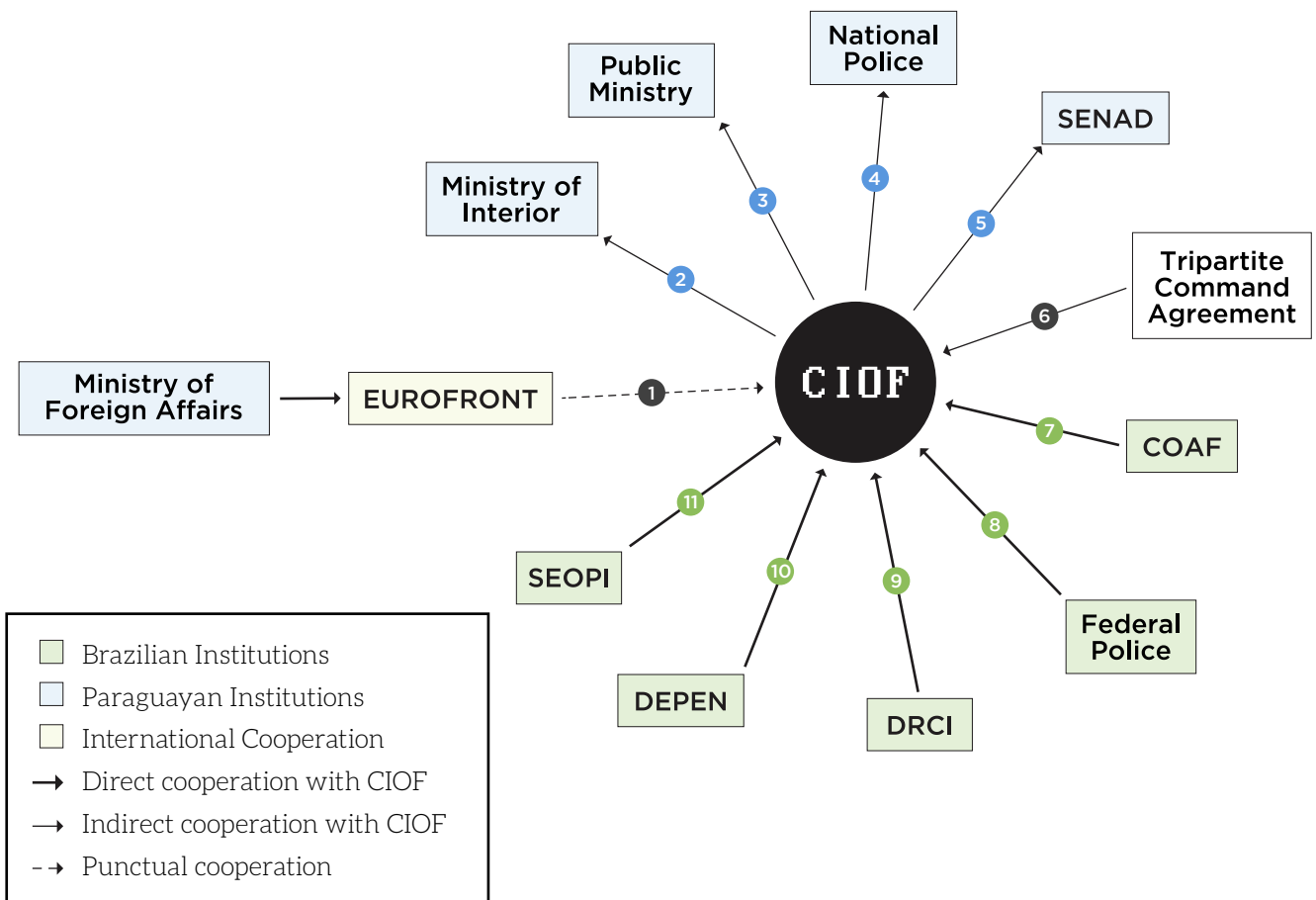
## STAKEHOLDER MAPPING

Throughout the research, information was gathered about the national and international actors linked to the CIOF. Although this mapping is incomplete, as this research could not obtain information about the function/linkage of some of the institutions that are linked to the Center, it helps to unravel the knot that seems to be the understanding of the CIOF stakeholders and, thus, to better understand the Center as a whole.

In the Brazilian case, the mapped actors are Brazilian public institutions that effectively help to maintain and operate the CIOF. The information collected was mostly acquired by FOIA requests. The second round of FOIA, as already explained, aimed specifically at understanding the role of actors that were not yet mapped, but most of them were not answered.

In the Paraguayan case, the mapped actors are national institutions that received invitations to join CIOF at some point in time, but did not accept the invitation for a number of reasons already explained in the interviews section. The Paraguayan DR and interviews also unveiled international cooperation programmes linked in some way to CIOF, and other surveillance programs in the area that are connected to the CIOF.

The idea here is to represent these connections in a visual way, with specific arrows linking the actors to the CIOF and outlining their role in the Center. The table with all the information about the actors, as well as their affiliation/function in the Center with the respective sources can be verified in Appendix 3.



- 1 Visit of representatives of the Ministry of Foreign Affairs to the CIOF database through the ongoing EUROFRONT cooperation program.
- 2 Invitation made to the Ministry of the Interior (nothing resulted from the invitation, so there is no direct involvement)
- 3 Cooperation through spontaneous exchange of information has already taken place. The research cannot confirm nor deny the existence of direct invitation to join CIOF, but there is no representation.
- 4 Invitation to join the CIOF was made to the National Police (nothing resulted from the invitation, so there is no direct involvement).
- 5 Invitation to SENAD to join the CIOF (nothing resulted from the invitation, so there is no direct involvement).
- 6 Collaboration through the Comando Tripartito.
- 7 Assistance in monitoring illegal financial transactions.
- 8 CIOF Administration. Like other public security agencies, it has the possibility to request information from the CIOF database.
- 9 Assistance in analysis of the processing of cooperation requests, by obtaining data and information on International Legal Cooperation, providing guidance to local and regional authorities in the formulation of requests and responses. It helps relations between national and foreign institutions in terms of research.
- 10 Through the Directorate of Penitentiary Intelligence (DIPEN), it examines the proposed object and participates in thematic groups. As for data sharing, DEPEN, through its representatives, identifies inmates in the Federal Penitentiary System and disseminates intelligence reports according to the appropriate technical channel.
- 11 Responsible for decision-making based on data from the CIOF database (the database is the responsibility of the CIOF itself, reporting directly to the Operations Directorate), as well as for the preparation, organization, coordination, conduction and execution of the CIO project.

## CONCLUSION

The current research constitutes an innovative effort to characterize the CIOF intelligence program, with a particular focus in making the different stakeholders visible at both sides of the borders in Brazil and Paraguay.

Moreover, there was an important effort to better understand what type of data is currently collected within CIOF, and what are the different mechanisms that are adopted in terms of data analysis, sharing and storage between the aforementioned stakeholders. Below, you can find the main conclusions grouped by chapters.

### **A. Integrated Border Centers have come to stay**

Firstly, it is important to highlight that findings at both sides of the border strongly suggest that the adoption and extension of intelligence programs such as CIOF are the trend to come. In Paraguay's case, this was particularly evident in the Ministry of Interior's interview, in which they pointed out several times to this idea, as well as to the necessary transnationalization of the program.

Such a trend was also visible in some of the findings of the DR, particularly in the narrative that was adopted in the visit of Brazil's Chancellor to Paraguay. A narrative that was very positive towards the adoption of integrated centers of this nature. Concretely, there was an announcement of extending similar programmes to CIOF, such as the Bipartite Command in the Pedro Juan Caballero-Ponta Porá area.

From the Brazilian side, this was evident in the interviews, as all of the interviewees have pointed out the lack of integration between public security agencies as an issue to be solved. They have also shown enthusiasm regarding the information centralization logic. This becomes especially clear in the "Future Predictions" topic. Also, as stated in the "International Cooperation" topic, the Federal Police interviewee mentioned that Argentina was finalizing the implementation of its own Fusion Center, which indicates the spread not only of the Fusion Center's logic, but of its institutionalization. This is compatible with what has been pointed out as the natural movement of the Center: to multiply and connect.

This trend was also visible in the Brazilian documents and news collected in the DR, which indicate the institutional intention of creating more Integrated Centers.

## **B. Stakeholders involvement with CIOF**

The research showcases the institutional wish of Brazilian authorities to internationalize the membership within the CIOF in Foz do Iguacu. It is evident that a number of invitations have been sent to Paraguayan authorities since the Center was inaugurated in 2019. Concretely, the research has found evidence of invitations sent to the Ministry of Interior, the National Police and the SENAD agency in Paraguay.

However, and at least on the Paraguayan side, it appears that not much has been done with such invitations. This is because intelligence information in the area is already available through other integrated programs such as the Tripartite Command. It is safe to say that, to date, there is no Paraguayan direct representation within CIOF.

Curiously, a news outlet found in the Brazilian DR takes note of apparent cooperation agreements between CIOF and different countries in the region, including Paraguay. This however, goes against the findings of the Paraguayan FOIAs and interviews, since in both cases there was a denial of the existence of cooperation agreements signed between Paraguayan authorities and CIOF. There is a need for further exploration in regard to this dissonance.

On the other hand, it is still not possible to fully affirm nor deny that a direct invitation has been sent by CIOF to the Paraguayan Public Ministry to join said Center. The FOIA answers are vague and not conclusive in their answers, aside from stating that the Public Ministry is not part of CIOF. Thus, it is possible to point to isolated access by the Public Ministry to the CIOF database. More details about this in the database section below.

The research has also found evidence that an apparent information exchange between the CIOF and the Tripartite Command is currently in place. No detail in the type of shared information has been found.

## **C. Lack of transparency**

It is important to point out the difficulties in accessing information about CIOF. Such difficulties are evidence of a lack of transparency around systems such as CIOF.

For the Paraguayan case, the FOIA answers were extremely vague, and in most cases with a lack of basic information of how CIOF operated. One possibility could be that, since there are no Paraguayan members within CIOF, the answers to the asked questions are not possible in Paraguay. However, the aforementioned vagueness was also present in terms of not even properly answering if an invitation to join CIOF was ever received.

The interviews were fundamental to mitigate such vagueness. They even evidenced discrepancies in terms of the responses of the FOIAs. Concretely, they helped confirm the existence of invitations directly sent from CIOF and received by Paraguayan authorities (see stakeholder section above), as well as an apparent integration between intelligence programs in the Triple Border Area (namely the Tripartite Command).

For the purpose of this research, it was impossible to access the invitations sent to Paraguayan authorities to join CIOF.

In the Brazilian case, the lack of transparency was evident from the DR: even if there were a lot of official government news reporting the implementation of the Center - and some announcing successful police operations which counted with the CIOF's support - none of the information available detailed the Center's operationalization. There was no information regarding the stakeholders' function within the Center; data collection, treatment and flow; and privacy limitations. It is important to highlight that the institutional process of the Center's implementation was also very opaque and the task of searching for official documents about the CIOF was very arduous. The FOIA's requests' answers helped in this sense, but were also not completely satisfying, whether not addressing the question posed, or not answering it at all.

To cite another example already mentioned, the second FOIA request sent to the Ministry of Justice and Public Security asked about the specific functions of DEPEN, ABIN, Federal Highway Police, IRS, Financial Intelligence Unit and Department of Asset Recovery and International Legal Cooperation in the CIOF. Only the last organ responded. Also, some of the answers made little sense, such as the second FOIA request sent to the Federal Police which asked for the concluding documents of the Working Group established by the Ordinance no. 264/2019. Such a request was not answered due to the lack of sufficient data to allow identification of the Ordinance. This led to the attachment of the Ordinance to the appeal, which, in its turn, established no need to adjudicate on the grounds that the agency would not be competent to answer the question.

The interviews were essential to complete the information gaps spotted in the two first phases, since the interviewees had a close relationship with the process of building the center.

#### **D. International Cooperation**

There is an interesting complementation in the findings from Brazil and Paraguay in relation to international actors' involvement in the Triple Border Area for the deployment of CIOF.

Concretely, the Paraguayan side identified, both in the documentary review and the interviews,

an important interest of the European Union in promoting the adoption of integrated centers such as CIOF.

EL PACTO and EUROFRONT are the main cooperation programmes currently in place that have support from the European Union. According to the interviews, both programs are interested in promoting integrated centers.

Moreover, it appears that EUROFRONT is part of a larger border management programme that is also present in Brazil and Argentina. As already mentioned in the findings section, the EUROFRONT programme conducted a visit to CIOF in 2021. It would appear that one of the main goals of such a program is to better equate how border management data is gathered between the European Union and the Triple Border area.

Curiously, there is no evidence of the EUROFRONT programme in the findings of the Brazilian side. However, the U.S. presence was very significant in the CIOF's implementation, whether during the Brazilian visitations of the U.S.' Fusion Centers (always accompanied by U.S.' public security agents representatives), or regarding the sharing information agreements (to which the Federal Police denied access).

## **E. Database access, privacy and data protection considerations**

For the Paraguayan findings, it was impossible to characterize the database nature of CIOF, since there is no actual representation of a Paraguayan authority within CIOF. The only available evidence for this is that of an apparent "spontaneous access" from the Public Ministry, and for a specific criminal investigation conducted a few years ago. The apparent lack of a cooperation agreement to govern such information exchange and the subsequent international data transfer, is particularly worrying and needs further exploration.

The above could be coupled with some of the findings of the interview stage in Brazil. For instance, the Paraná's Civil Police's interviewee stated that, although the sharing of information with other authorities is crucial for quick responses, sometimes those relationships have to be informal, "[...] because excessive formality in a case like this will stifle the work for both sides.". The interviewee strongly affirmed that agreements between different polices have to exist, but "[...] some formal things and some from this interpersonal relationship. Because sometimes excessive formalism can stifle the Center's efficiency. But for sure, in a Border Center, you will obviously have negotiations very close to the authorities in other countries."

The shortage of official documents during the DR phase supports this statement. It is important to highlight that this research does not state that official documents which institutionalized CIOF's

project and operations are not public or that they do not exist, but only that they are very complicated to find.

As already stated, the information regarding the characteristics of the CIOF's database came essentially from the FOIA's requests. Although not fully complete, if connected with the Center's main goal of combining and centralizing information, it seems that the CIOF's database can be accessed when solicited by public security organs, since it also has the function of assisting investigations. The main finding is that the CIOF's database will work as a "pool of information" (Answer to question 8 - Federal Police). Even so, CIOF does not have a privacy policy document and the intention of producing one is not known. There is also no administrative act that regulates the collection and processing of these data.

On the other hand, it is important to point out the perception of inescapable trade-offs between the rights of privacy with that of security. This was particularly evident in the Paraguayan Ministry of Interior interviewee opinion. Although in itself, such perception is not necessarily an institutional opinion - it is not unreasonable to say that those perceptions could be quite extended between civil servants working in security institutions such as that of the Ministry of Interior or the National Police.

In this sense, it is also possible to affirm that such perception, coupled with a lack of due process when sending out invitations to Paraguayan authorities to join CIOF, could, at the very least, have a negative impact when evaluating programmes such as CIOF through a human rights lense.

## **F. Limitations of the research**

The value of the present research lies in its exploratory nature. However, due to geographical limitations, an approach to include potential Argentinian involvement within CIOF was not explored at this stage of the research. Such an approach is necessary to further understand the implications of integrated centers such as CIOFs in a highly sensible area like the Triple Border Area.

On the other hand, while the research has provided clues about a possible integration of CIOF with security programmes like the Tripartite Command, further exploration is needed to characterize such integration, as well as the interrelation with other security programmes in the area, such as Fronteira Tech, the Vigia programme and others.

Additionally, more needs to be done in terms of understanding the perception of people in the area and towards this system. A particular focus in understanding the level of citizens' awareness of such programs and the lack of transparency and extensive surveillance that is coupled to them should be adopted. And, finally, an urgent research agenda spotted by this research regards the need to understand the issues and the legal limitations of the increase of private companies' participation in the public security field.

## BIBLIOGRAPHY

- Agostini, R. (2017, October 4). Inauguraron un sistema de control de fronteras apoyado con cámaras y drones. La Nación. <https://www.lanacion.com.ar/seguridad/inauguraron-un-sistema-de-control-de-fronteras-apoyado-con-camaras-y-drones-nid2068981/>
- BRASIL. (2019). PORTARIA No 264, DE 25 DE MARÇO DE 2019.
- BRASIL. (2019a). DOU, N° 131. <https://dspace.mj.gov.br/bitstream/1/4957/1/Extrato%20de%20Publica%c3%a7%c3%a3o.pdf>
- BRASIL.(2016). D. 8903. [http://www.planalto.gov.br/ccivil\\_03/\\_ato2015-2018/2016/decreto/D8903.htm](http://www.planalto.gov.br/ccivil_03/_ato2015-2018/2016/decreto/D8903.htm)
- BRASIL.(2019a). D9662. [http://www.planalto.gov.br/ccivil\\_03/\\_ato2019-2022/2019/decreto/D9662.htm](http://www.planalto.gov.br/ccivil_03/_ato2019-2022/2019/decreto/D9662.htm)
- Cruz, I. (2020, Outubro 10). O que é a Seopi. E quais suas ações desde que foi criada. Nexo Jornal. <https://www.nexojornal.com.br/expresso/2020/08/10/O-que-%C3%A9-a-Seopi.-E-quais-suas-a%C3%A7%C3%B5es-desde-que-foi-criada>
- Data Privacy Brasil (2021) Request for access to information (FOIA) - MJSP.
- Data Privacy Brasil (2021a) Request for access to information (FOIA) - Seopi.
- Data Privacy Brasil (2021b) Request for access to information (FOIA) - DEPEN.
- Data Privacy Brasil (2021c) Request for access to information (FOIA) - Polícia Federal.
- Data Privacy Brasil (2021d) Request for access to information (FOIA) - Ministério das Relações Exteriores.
- Data Privacy Brasil (2021e) Request for access to information (FOIA) - Secretaria de Segurança Pública do Paraná (SESP).
- Data Privacy Brasil (2021f) Second request for access to information (FOIA) - Polícia Federal.
- Data Privacy Brasil (2021g) Second request for access to information (FOIA) - DRCI.
- DHS, DOJ. (2010). Considerations for Fusion Center and Emergency Operations Center Coordination. 86.
- DHS, DOJ. (2010a) Fusion Process Technical Assistance Program and Services. Fusion Center Privacy Policy Development: Privacy, Civil Rights, and Civil Liberties Policy Template. 62.



- DHS, DOJ (2006) Fusion Center Guidelines Developing and Sharing Information and Intelligence in a New Era. 104.
- DHS. (n.d.). Intro to the Network of National Fusion Centers. Retrieved January 12, 2022, from <https://vod-progressive.akamaized.net/exp=1642031522~acl=%2Fvim-eo-prod-skyfire-std-us%2F01%2F3698%2F12%2F318494678%2F1286161999.mp4~hmac=edaca520792b3a6369e6a23699cabfd553949243543dbda741c1d06fcc1a25ca/vimeo-prod-skyfire-std-us/01/3698/12/318494678/1286161999.mp4?filename=Intro+to+the+Net-work+of+National+Fusion+Centers.mp4>
- El Paso Intelligence Center (EPIC). (n.d.). DEA - United States Drug Enforcement Administration. Consultado em Janeiro 11, 2022, from <https://www.dea.gov/what-we-do/law-enforcement/epic>
- El Paso Police Department “Matrix” Fusion Center Privacy Policy (2011) <https://www.elpasotexas.gov/assets/Documents/CoEP/Police/Fusion-Center/El-Paso-PD-MATRIX-PRIVACY-POLICY-Approved-101311.pdf>
- Folha de S. Paulo. (2013). FAB recebe dois novos aviões não tripulados para vigiar fronteiras. Folha de S.Paulo. <http://www1.folha.uol.com.br/poder/2013/02/1232556-fab-recebe-dois-novos-avioes-nao-tripulados-para-vigiar-as-fronteiras.shtml>
- Gabinete de Segurança Institucional. (2020, Janeiro 10). Programa de Proteção Integrada de Fronteiras (PPIF). Gabinete de Segurança Institucional. <https://www.gov.br/gsi/pt-br/assuntos/programa-de-protecao-integrada-de-fronteiras-ppif-1/programa-de-protecao-integrada-de-fronteiras-ppif>
- Governo do Brasil. (2019). Primeiro Centro Integrado de Operações de Fronteira é inaugurado em Foz do Iguaçu. Governo do Brasil. <https://www.gov.br/pt-br/noticias/justica-e-seguranca/2019/12/primeiro-centro-integrado-de-operacoes-de-fronteira-e-inaugurado>
- Governo do Brasil. (2021, Abril 29). Centro Integrado de Operações de Fronteira passa a funcionar 24 horas por dia. <https://www.gov.br/pt-br/noticias/justica-e-seguranca/2021/04/centro-integrado-de-operacoes-de-fronteira-passa-a-funcionar-24-horas-por-dia>
- La Nación. (2019). Brasil instaló cámaras para el reconocimiento facial y placas. [https://lanacion.com.py/destacado\\_edicion\\_impresa/2019/12/17/brasil-instalo-camaras-para-el-reconocimiento-facial-y-placas/](https://lanacion.com.py/destacado_edicion_impresa/2019/12/17/brasil-instalo-camaras-para-el-reconocimiento-facial-y-placas/)
- La Nación. (2020a). La Nación / Brasil ofrece al Paraguay formar parte de su Centro de Inteligencia. [https://lanacion.com.py/destacado\\_edicion\\_impresa/2020/02/04/brasil-ofrece-al-paraguay-formar-parte-de-su-centro-de-inteligencia/](https://lanacion.com.py/destacado_edicion_impresa/2020/02/04/brasil-ofrece-al-paraguay-formar-parte-de-su-centro-de-inteligencia/)
- La Nación. (2020b). Valorán invitación de Brasil al Centro Integrado de Frontera. [https://lanacion.com.py/politica\\_edicion\\_impresa/2020/02/11/valoran-invitation-de-brasil-al-centro-integra-](https://lanacion.com.py/politica_edicion_impresa/2020/02/11/valoran-invitation-de-brasil-al-centro-integra-)

## do-de-frontera/

- López, K. (2021, Janeiro 29). Sistema de reconocimiento facial en el Puente de la Amistad ya enroló a más de 4.000 personas. Agencia IP. <https://www.ip.gov.py/ip/mas-de-4-000-personas-enroladas-al-sistema-de-reconocimiento-facial-en-el-puente-de-la-amistad/>
- Master Ambiental. (2015, Julho 7). Parque Tecnológico Itaipu—PTI. Master Ambiental - Consultoria Ambiental. <https://www.masterambiental.com.br/categoria-clientes/comercio-e-servicos/parque-tecnologico-itaipu-pti/>
- MATRIX, City of El Paso Texas. ([s.d.]). <https://www.elpasotexas.gov/police-department/fusion-center>
- Mereles, R. (2019a, Julho 30). Paraguay, Argentina y Brasil están logrando un ‘éxito permanente’ en la triple frontera, dice ministra Bullrich. Agencia IP. <https://www.ip.gov.py/ip/paraguay-argentina-y-brasil-estan-logrando-un-exito-permanente-en-la-triple-frontera-dice-ministra-bullrich/>
- Mereles, R. (2019b, Novembro 7). Mercosur firmó acuerdo de cooperación policial en espacios fronterizos. Agencia IP. <https://www.ip.gov.py/ip/mercosur-firmo-acuerdo-de-cooperacion-policial-en-espacios-fronterizos/>
- Ministerio de Relaciones Exteriores. (2020). Paraguay y Brasil ratifican excelente relación bilateral con obras de infraestructura y conectividad, y acciones conjuntas. <https://www.mre.gov.py/index.php/noticias-de-embajadas-y-consulados/paraguay-y-brasil-ratifican-excelente-relacion-bilateral-con-obras-de-infraestructura-y-conectividad-y-acciones-conjuntas>
- Ministerio de Relaciones Exteriores. (2021a). Paraguay y Brasil acogerán la visita de expertos europeos en gestión fronteriza. <https://www.mre.gov.py/index.php/noticias-de-embajadas-y-consulados/paraguay-y-brasil-acogeran-la-visita-de-expertos-europeos-en-gestion-fronteriza>
- Ministerio de Relaciones Exteriores. (2021b). Paraguay y Brasil destacan cooperación sobre seguridad en la triple frontera del Programa EUROFRONT. <https://www.mre.gov.py/index.php/noticias-de-embajadas-y-consulados/paraguay-y-brasil-destacan-cooperacion-sobre-seguridad-en-la-triple-frontera-del-programa-eurofront>
- Ministerio del Interior. (2021, Maio 19). Ministro del Interior destaca cooperación policial entre Argentina, Brasil y Paraguay, en el marco del 25° Aniversario del Comando Tripartito [Tweet]. @minteriorpy. <https://twitter.com/minteriorpy/status/1395038009607737348>
- Ministerio Público. (2020). Tras allanamiento detienen a líder narcotraficante brasileiro buscado por tráfico de drogas y de armas. <https://www.ministeriopublico.gov.py/nota/tras-allanamiento-detienen-a-lider-narcotraficante-brasilero-buscado-por-trafico-de-drogas-y-de-armas-5167>
- MJSP. (2018, Dezembro 4). Ministro Jungmann inaugura, no Paraná, Centro Integrado de Inteligência de Segurança Pública—Regional Sul. Ministério da Justiça e Segurança Pública. <https://www.justica.gov.br/noticias-seguranca/collective-nitf-content-1544017488.39>

- MJSP. (2019, Dezembro 16). Foz do Iguaçu recebe o primeiro Centro Integrado para combater o crime organizado nas fronteiras. <https://www.gov.br/mj/pt-br/assuntos/noticias/foz-do-iguacu-recebe-o-primeiro-centro-integrado-para-combater-o-crime-organizado-nas-fronteiras>
- MJSP. (2019a). Em missão oficial aos Estados Unidos, Moro intensifica cooperação entre os dois países. Ministério da Justiça e Segurança Pública. <https://www.justica.gov.br/news/collective-nitf-content-1553073984.69>
- MJSP. (2019b). Algumas medidas para o combate aos crimes de corrupção, crime organizado e crimes violentos (Projetos Estratégicos MJSP). <https://cdn.oantagonista.net/uploads/2019/03/Moro.pdf>
- MJSP. (2019c). Centro Integrado de Inteligência de Segurança Pública Regional Sul entra em operação na cidade de Curitiba (PR). Ministério da Justiça e Segurança Pública. <https://www.justica.gov.br/news/collective-nitf-content-1557524929.17>
- MJSP. (2020, Julho 28). Centro Integrado de Operações de Fronteira auxilia na prisão de foragido no estado do Pará. Ministério da Justiça e Segurança Pública. <https://www.gov.br/mj/pt-br/assuntos/noticias/centro-integrado-de-operacoes-de-fronteira-auxilia-na-prisao-de-foragido-no-estado-do-para>
- MJSP. (2020a). Centro Integrado de Operações de Fronteira auxilia na prisão de acusado por abuso e exploração sexual infantojuvenil. Ministério da Justiça e Segurança Pública. <https://www.gov.br/mj/pt-br/assuntos/noticias/centro-integrado-de-operacoes-nas-fronteiras-auxilia-na-prisao-de-acusado-por-abuso-e-exploracao-sexual-infantojuvenil>
- MJSP. (2020b). Atuação do Centro Integrado de Operações de Fronteira resulta na prisão de um homem acusado de violência sexual. Ministério da Justiça e Segurança Pública. <https://www.gov.br/mj/pt-br/assuntos/noticias/atuacao-do-centro-integrado-de-operacoes-de-fronteira-resulta-na-prisao-de-um-homem-acusado-de-violencia-sexual>
- MJSP. (2021). Centro Integrado de Operações de Fronteira do MJSP auxilia GAECO em prisão de casal foragido da Justiça do Goiás. Ministério da Justiça e Segurança Pública. <https://www.gov.br/mj/pt-br/assuntos/noticias/centro-integrado-de-operacoes-de-fronteira-do-mjsp-auxilia-gaeco-em-prisao-de-casal-foragido-da-justica-do-goias>
- MJSP. (2021a). Policiais prendem homem com aproximadamente 100 kg de maconha na BR277, no Paraná—Português (Brasil). <https://www.gov.br/pf/pt-br/assuntos/noticias/2021/05/policiais-prendem-homem-com-aproximadamente-100-kg-de-maconha-na-br277-no-parana>
- MJSP. (2021b). Centro Integrado de Operações de Fronteira do MJSP auxilia Polícia Civil de São Paulo em prisão de acusado por participação em grandes assaltos. Ministério da Justiça e Segurança Pública. <https://www.gov.br/mj/pt-br/assuntos/noticias/centro-integrado-de-operacoes-de-fronteira-do-mjsp-auxilia-policia-civil-de-sao-paulo-em-prisao-de-acusado-por-participacao-em-grandes-assaltos>

- Ofício n. 1804/2019/AFEPAR/MJ. (2019). [https://www.camara.leg.br/proposicoesWeb/prop\\_mostrarintegra?codteor=1789154](https://www.camara.leg.br/proposicoesWeb/prop_mostrarintegra?codteor=1789154)
- Pacievitch, T. (2009). Itaipu Binacional. InfoEscola. <https://www.infoescola.com/geografia/itai-pu-binacional/>
- Parque Tecnológico de Itaipu. (2016, Dezembro 16). Centro Integrado de Operações começa a funcionar no Parque Tecnológico Itaipu – Fundação Parque Tecnológico de Itaipu. <https://www.pti.org.br/centro-integrado-de-opera%3%a7%3%b5es-come%3%a7a-funcionar-no-parque-tec-nol%3%b3gico-itaipu/>
- Polícia Civil do Paraná. (2019, Dezembro 16). Centro de Operações de Fronteira fortalece segurança do Paraná e do Brasil. Polícia Civil do Paraná. <https://www.policiacivil.pr.gov.br/Agencia-de-Noticias/Noticia/Centro-de-Operacoes-de-Fronteira-fortalece-seguranca-do-Parana-e-do>
- Primeira Linha. (2019, Dezembro 17). Segurança: Centro de Operações de Fronteira fortalece segurança do Paraná e do Brasil. Jornal Primeira Linha. <https://www.primeiralinha.com.br/noticias.php?noticia=1469&tipo=online>
- Rodrigues, N. (2020). Intervenção federal no Rio de Janeiro em 2018. InfoEscola. <https://www.infoescola.com/historia/intervencao-federal-no-rio-de-janeiro-em-201>
- TEDIC.. (2021b). Solicitação de acesso à informação—Itaipu Binacional. <https://informacionpublica.paraguay.gov.py/portal/#!/ciudadano/solicitud/48342>
- TEDIC.. (2021c). Solicitação de acesso à informação – Ministério das Relações Exteriores. <https://informacionpublica.paraguay.gov.py/portal/#!/ciudadano/solicitud/48340>
- TEDIC.. (2021d). Pedido de acesso à informação – Ministério do Interior. <https://informacionpublica.paraguay.gov.py/portal/#!/ciudadano/solicitud/48338>
- TEDIC.. (2021e). Pedido de acesso à informação—Ministério da Defesa Nacional. <https://informacionpublica.paraguay.gov.py/portal/#!/ciudadano/solicitud/48468>
- TEDIC.. (2021f). Pedido de acesso à informação – Polícia Nacional. <https://informacionpublica.paraguay.gov.py/portal/#!/ciudadano/solicitud/48339>
- TEDIC. (2021g). Solicitação de acesso à informação – Ministério Público. <https://informacionpublica.paraguay.gov.py/portal/#!/ciudadano/solicitud/48341>
- TEDIC. (2021h). Segunda solicitação de acesso à informação – Ministério Público. <https://informacionpublica.paraguay.gov.py/portal/#!/ciudadano/solicitud/49246>
- Última Hora. (2019). La Triple Frontera, vigilada por la inteligencia brasileña. ultimahora.com. <https://www.ultimahora.com/la-triple-frontera-vigilada-la-inteligencia-brasilena-n2862732.html>

- Última Hora. (2020). Brasil despliega Operativo Ágata en la Triple Frontera. ultimahora.com. <https://www.ultimahora.com/brasil-despliega-operativo-agata-la-triple-frontera-n2904557.html>
- Última Hora. (2021). Brasil inicia una nueva Operación Aghata en la frontera con Paraguay. ultimahora.com. <https://www.ultimahora.com/brasil-inicia-una-nueva-operacion-aghata-la-frontera-paraguay-n2941225.html>
- Valente, R. (2020, Julho 24). Ação sigilosa do governo mira professores e policiais antifascistas. <https://noticias.uol.com.br/colunas/rubens-valente/2020/07/24/ministerio-justica-governo-bolsonaro-antifascistas.htm>
- Viana, N. (2020, Maio 4). Sergio Moro abriu as portas da Polícia Federal para o FBI. Agência Pública. <https://apublica.org/2020/05/no-ministerio-da-justica-sergio-moro-abriu-as-portas-para-o-fbi/>
- Vilela, P. R. (2018, Novembro 26). Moro anuncia criação da Secretaria de Operações Policiais Integradas. Agência Brasil. <https://agenciabrasil.ebc.com.br/politica/noticia/2018-11/moro-anuncia-criacao-da-secretaria-de-operacoes-policiais-integradas>

## APPENDIX 1

### A. Brazil's FOIA

1st FOIAs	
Organ: MJSP & Seopi	
Question	Answer
In addition to the US, has there been any involvement or consultation with international governments regarding the implementation, operationalization and management of CIOF? If yes, which ones? In what terms did this relationship take place (eg, donation of materials, technical training, visits, among others)?	It is not possible to answer this question by CIOF, since the creators of the Center (Minister of Justice, Secretary of Integrated Operations and other Coordinators) are no longer part of the current administration.
What was provided by the US government to the Brazilian government within the scope of the CIOF implementation project?	Nothing was provided by the Government of the United States of America. The creation of the CIOF involved only an Agreement with Itaipu Binacional, which promoted the adaptation of physical space and the purchase of equipment (computer and furniture).
Is the relationship between Brazilian Public Security and the FBI unprecedented? If not, what other security programs have the FBI been involved in?	Not applicable to CIOF.
Are data collected and processed by CIOF shared with databases in the US? If so, what justification for this international sharing?	No data is shared with US banks. Cooperation is punctual. As an example, the support provided by the US government in locating a Brazilian fugitive from justice who resided in the US is cited.
Is the US or any other international government involved in CIOF's technical data sharing decisions?	No.
Is the US or any other international government involved in CIOF's technical data handling decisions?	No.
Does the US have jurisdiction in Brazil / Paraguay?	Not applicable to CIOF.
Is Seopi the responsible organ for making decisions based on data from this CIOF database?	Yes

Is there a human review of the conclusions reached by the algorithms used by CIOF?	Yes.
Which agency is responsible for the CIOF database?	The CIOF itself, reporting directly to the MJSP Operations Directorate.
How is it decided which people will have their data collected to integrate the CIOF database?	Confidential information. Data analysis is carried out on demand from institutions in the area of public safety.
Is the data collected by CIOF shared with the Federal Highway Police, National Intelligence Agency (Abin), Ministry of Defense, Financial Intelligence Unit (UIF - former Coaf), Federal Revenue, Military Police, Civil Police and Scientific Police or with any other bodies not mentioned?	When requested, they can be shared.
Is all collected data shared or just some? If only some, what data is shared?	Only data related to criminal activities and on demand from institutions.
In technical terms, is it a case of data sharing or interoperability?	Interoperability.
What is the purpose of sharing the data?	Repression and/or prevention of criminal activities.
For how long is the collected data stored in the CIOF database?	Confidential information.
What is the administrative act that defines / regulates the collection and processing of these data?	No answer.
Is the CIOF database integrated with other existing security and migration programs in the Tri-Border area, such as VIGIA?	The CIOF database is restricted to the Center. The information requested within Operation Horus is shared and sharing is recorded. There is no integration between databases.
Is the CIOF database integrated with the Integrated Center for Regional Public Security Intelligence - Southeast, in São Paulo?	No.
If so, how would this integration work/work in technical terms? Is it a case of interoperability or data sharing?	Not applicable.
What kind of data is shared, specifically? For what reason?	Not applicable.

**Organ:** Depen

### Question

*All the questions above were sent to DEPEN, to which there was one integrated answer.*

### Answer

The INTEGRATED BORDER OPERATIONS CENTER (CIOF), a unit of the Ministry of Justice and Public Security (MJSP), in the municipality of Foz do Iguacu/PR is a project that was conceived and developed within the scope of the Directorate of Operations of the Secretariat for Integrated Operations (SEOPI). To carry out the implementation of the project, a working group was created by Ministerial Ordinance No. 264, of March 25, 2019, whose members were I - from the Federal Police; II - Federal Highway Police; III - the Financial Activities Control Board; IV - of the National Public Security Secretariat; V - from the Department of Asset Recovery and International Legal Cooperation of the National Secretariat of Justice; VI - of the National Penitentiary Department; VII - the Secretariat for Integrated Operations; VIII - the Executive Secretariat; and IX - Special Advisory on Legislative Matters.

3. The Project was created with a view to implementing a data and systems sharing unit through liaison officers, managing multi-agency police investigations, as well as coordinating overt border police operations, based on the need for firm and coordinated action of the Brazilian State in combating organized crime in the border region.

4. In its preparation, the Seopi, through the General Coordination for Combating Organized Crime, took into account as a historical context the strengthening and expansion of the actions of local, interstate and transnational Criminal Organizations (ORCRIM), which use logistical resources modern, protected means of communication and quick articulation in acts harmful to society.

5. International experiences such as the FUSION CENTERS were taken into account, in which the EPIC (EL PASO INTELLIGENCE CENTER), administered by the US anti-drug agency DEA (Drug Enforcement Administration), which brings together liaison officers from 24 internal institutions and from different countries.

6. The National Penitentiary Department (DEPEN), through the Directorate of Penitentiary Intelligence (DIPEN), is responsible for participating in order to examine the proposed object and participate of the thematic groups. As for data sharing, DEPEN, through its representatives, it is up to the identification of individuals incarcerated in the Federal Penitentiary System and dissemination of intelligence reports according to the appropriate technical channel.



7. Regarding the inquiries contained in the Request for Access to Information (15946657), of item 01 to 07, this Coordination is unable to give the proper answers due to the fact that the preparation, organization, coordination and execution of the CIOF Project is incumbent upon exclusively to the Secretariat for Integrated Operations. Therefore, with regard to questions relating to the objectives, historical and international context, scope of action, administration, project management, databases and technologies, mission, agreements with international organizations, processing and sharing of data and knowledge, will be properly answered forwarded to the Secretariat for Integrated Operations of the Ministry of Justice and Public Security

**Organ:** Federal Police

**Question**

*All the questions above were sent to the Federal Police, to which there was one integrated answer.*

**Answer**

According to clarifications by the Police Intelligence Directorate - DIP/PF, the Integrated Center for Border Operations in the Municipality of Foz do Iguacu/PR ("CIOF") is a strategic project of the Ministry of Justice and Public Security, conducted by the Secretariat of Operations Integrated (SEOPI/MJSP).

**Organ:** Ministry of Foreign Affairs

**Question**

**Answer**

1. In addition to the US, has there been any involvement or consultation with international governments regarding the implementation, operationalization and management of CIOF? If yes, which ones? In what terms did this relationship take place (eg, donation of materials, technical training, visits, among others)?
2. What was provided by the US government to the Brazilian government under the CIOF implementation project?
3. Is the relationship between Brazilian Public Security and the FBI unprecedented? If not, what other security programs have the FBI been involved in?
4. Is data collected and processed by CIOF shared with databases in the US? If so, what justification

"The Center for Integrated Operations at the Border (CIOF) is inspired by an inter-institutional cooperation model, originally developed by the US, to face some serious types of crime.

According to MJSP Ordinance n. 264/2019, which set up a working group responsible for studying the creation of the CIOF, the Ministry of Foreign Affairs (MRE) was not called upon to carry out its design and composition process, nor does it participate operationally in it.

In this capacity, the MRE is not competent to answer the questions in question.

It should be noted that the operation of CIOF, inaugurated on December 16, 2019, is under the responsibility of the Secretariat for Integrated Operations

<p>for this international sharing?</p> <p>5. Is the US or any other international government involved in CIOF's technical data sharing decisions?</p> <p>6. Is the US or any other international government involved in CIOF's technical data handling decisions?</p> <p>7. Does the US have jurisdiction in Brazil / Paraguay?</p>	<p>(Seopi) of the Ministry of Justice and Public Security (MJSP).</p> <p>Its purpose, according to the MJSP (see <a href="https://www.gov.br/mj/pt-br/assuntos/noticias/centro-integrado-de-operacoes-de-fronteira-do-ministerio-da-justica-e-seguranca-publica-completa-1-ano">https://www.gov.br/mj/pt-br/assuntos/noticias/centro-integrado-de-operacoes-de-fronteira-do-ministerio-da-justica-e-seguranca-publica-completa-1-ano</a>), is to promote the integration between public security agents dedicated to the fight against national and transnational organized crime.</p> <p>CIOF is also active in overt police operations and assisting in investigations, in cooperation with state and federal police institutions, as well as institutions in charge of public security abroad. In light of the above, and in line with the provisions of Article 11, § 1, III, of the Access to Information Law, the MRE opines that the issues object of the consultation must be reported to the MJSP.”</p>
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<b>Organ:</b> Paraná Public Security Secretariat (SESP)	
<b>Question</b>	<b>Answer</b>
<p>1. Is the database under state or federal responsibility?</p> <p>2. What legal instruments support the Integrated Border Operations Center and define its objectives? (Alternatively: What is the administrative act that defines / regulates the collection and processing of this data?)</p> <p>3. The data collected by CIOF is shared with the Federal Police, Federal Highway Police, National Intelligence Agency (Abin), Ministry of Defense, Financial Intelligence Unit (UIF - former Coaf), Federal Revenue, Military Police, Civil Police and Police Scientific or another body not mentioned?</p> <p>4. What are the ways of integrating existing data and information?</p>	<p>Dear Data Privacy Brazil Research Association:</p> <p>In response to the claim made by you, we inform you that the Integrated Border Operations Center (CIOF) is managed by the Ministry of Justice and Public Security.</p> <p>We request that you get in touch with the aforementioned Body, to clarify the questions raised.</p> <p>We appreciate the contact.</p> <p>Any questions, we are at your disposal.</p> <p>Kind regards.</p> <p>Ombudsman of the Secretary of State for Public Security of the State of Paraná</p>

<p>5. Does SESP participate in the decision of which people will have their data collected to integrate the CIOF database? If yes, what are the criteria for this decision?</p> <p>6. Does CIOF promote data integration with the Integrated Center for Public Security Intelligence in the South Region (CIISP-South)? If so, how would this integration work/work in technical terms? What kind of data is shared?</p> <p>7. Does the Integrated Center for Public Security Intelligence – Southern Regional (CIISPR-South) have US participation? If yes, on what terms?</p> <p>8. Is the person in charge of data protection André Luis Marques de Oliveira from the Scientific Police?</p>	
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<b>2nd FOIAs</b>	
<b>Organ:</b> Federal Police	
<b>Question</b>	<b>Answer</b>
<p>1. Is there a document that clarifies CIOF's privacy policy? For example, like the privacy document of The Matrix, Fusion Center of El Paso (ANNEX I), model that inspired CIOF?</p> <p>2. If there is no document on the CIOF privacy policy: will this be done? If not, why? Why isn't there yet?</p>	<p>According to clarifications by the Police Intelligence Directorate - DIP/PF, the Integrated Border Operations Center in the Municipality of Foz do Iguacu/ PR ("CIOF") is a strategic project of the Ministry of Justice and Public Security, conducted by the Secretariat of Integrated Operations (SEOPI/MJSP).</p>
<p>3. According to government news (ANNEX 2), on March 19, the MJSP signed institutional cooperation agreements with the Federal Investigation Agency, the FBI, and with the US Department of Homeland Security, Homeland Security - DHS, aiming at the sharing information about criminal groups and terrorists with a focus on combating transnational organized crime. The agreement with the FBI provides for the exchange of fingerprint identifying information in criminal investigations.</p>	<p>The instruments of agreements in question contain tools used in defense of society, so that their dissemination would enable criminals to gain knowledge to reach them, with the aggravation of weakening not only national security, but also that of the signatory foreign country, which was not consulted on the publication of these terms of cooperation. Thus, any publicity could generate a lack of confidence in signatory countries to enter into agreements with Brazil in view of the possibility of</p>

<p>Where can we find these agreements?</p> <p>4. According to the DOU of July 10, 2019 (ANNEX 3), the director general of the Federal Police signed an Inter-Institutional Cooperation Agreement with the Drug Enforcement Administration's (DEA) El Paso Intelligence Center whose provision is for voluntary sharing police information through established procedures and guidelines. Where is this agreement located so that we can access it?</p>	<p>seeing their lines of action to combat terrorism, drug trafficking, international criminal organizations, etc., unduly exposed. For no other reason, these agreements are not published, when signed, in their entirety, but only an extract. This measure is also intended not only to protect the information, but also to meet the requirement that is usually formulated by the signatory country, namely, the non-publication of the signed agreement. In view of the foregoing, due to unreasonableness and because the requested documents contain restricted access information, its disclosure is not possible.</p>
<p>Who were the participants of the Working Group established by Ordinance n. 264/2019? Where are the conclusion documents of this Working Group found?</p>	<p>After consulting the competent body of this Federal Police, the General Coordination of International Cooperation - CGCI/PF clarified that it could not report on the matter due to the lack of sufficient data to allow identification of the ordinance in question.</p>

Appeal	
Question	Answer
<p><i>In the appeal, we sent a copy of Ordinance n. 264/2019, so that the last question could be answered.</i></p>	<p><i>No need to adjudicate.</i></p> <p>(Note: with respect to the MJSP-FBI agreement, the appeal clarified that "it turns out that, despite the fact that access to data was denied at source, the requested information is already public")</p>

Organ: MJSP	
Question	Answer
<p>1. What is DEPEN's role in CIOF? Specifically, does DEPEN only contribute with its own data and information or does it have any other role in the operation of the Center?</p> <p>2. What is ABIN's role in CIOF? Specifically, does ABIN only contribute with its own data and</p>	<p><i>Only the Department of Asset Recovery and International Legal Cooperation answered, as follows:</i></p> <p>The Department of Asset Recovery and International Legal Cooperation of the National Secretariat of Justice (DRCI/SENAJUS) exercises the role of central authority, through the coordination and</p>

<p>information or does it have any other role in the operation of the Center?</p> <p>3. What is the role of the Federal Highway Police in CIOF? Specifically, does the PRF only contribute with its own data and information or does it have any other role in the operation of the Center?</p> <p>4. What is the role of the IRS in CIOF? Specifically, does the Federal Revenue only contribute with its own data and information or does it have any other role in the operation of the Center?</p> <p>5. What is the role of the Department of Asset Recovery and International Legal Cooperation in CIOF? Specifically, does the DRCI only contribute with its own data and information or does it have any other role in the operationalization of the Center?</p> <p>6. What is the role of the Financial Intelligence Unit at CIOF? Specifically, does the FIU only contribute its own data and information or does it have any other role in the operation of the Center?</p>	<p>instruction of active and passive requests for international legal cooperation in civil and criminal matters, including in matters of international maintenance, international abduction of children, international adoption, extradition, transfer of sentenced persons and transfer of sentence.</p> <p>The DRCI assists the Integrated Border Operations Center (CIOF) in the analysis and processing of requests for cooperation, by obtaining data and information about International Legal Cooperation, providing guidance to local and regional authorities on the formulation requests and responses, in addition to fostering relations between national and foreign institutions in investigative matters.</p>
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**B. Paraguay's FOIAs**

<b>Request #48338 - Ministry of Interior</b>	
<b>Thematic Axes</b>	<b>Answers</b>
<p>Paraguayan government access to CIOF</p> <p>Other International governments involvement</p> <p>Data processing guidelines</p> <p>Integration with other security programs</p>	<p>The CIOF is coordinated by the Federal Police with the support of the Federal Highway Police, the National Intelligence Agency, the Ministry of Defence, the Financial Intelligence Unit, the Receita Federal, the National Penitentiary Department and state police. Its mission is to command and control intensive operations, covering the area of Mato Grosso do Sul and the border with Argentina and Paraguay, and to support investigations throughout the country. In view of the above, we kindly ask you to forward your queries to the Ministry</p>

	of Foreign Affairs, so that they can be answered, taking into account that they refer to issues between governments and the agreements that arise from them. Likewise, to date, there is no state police officer or official from any other institution with a permanent presence before the CIOF.
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<b>Request #48339 - National Police</b>	
<b>Thematic Axes</b>	<b>Answers</b>
Paraguayan government access to CIOF Other International governments involvement Data processing guidelines Integration with other security programs	<p>The Tripartite Command/Paraguayan Delegation is an International Cooperation Agreement signed on May 18, 1996, by the Ministers of the Interior of the Republic of Paraguay and Argentina and the Minister of Justice of the Federative Republic of Brazil, in the city of Puerto Iguazú. There, the Tripartite Command was founded and installed, integrated by the three countries in view of the need to generate strategic actions to confront the problem of organised crime, oriented towards the development of cooperation measures for security and the exchange of information.</p> <p>The channel for the exchange of information in this Specialised Technical Unit is the Intelligence Centre of the Federal Police in Foz do Iguacu. <b>There are no agreements and conventions between the Tripartite Command/Paraguayan Delegation and the CIOF.</b></p>

<b>Request #48340 - Ministry of Foreign Affairs</b>	
<b>Thematic Axe</b>	<b>Answer</b>
Paraguayan government access to CIOF	<p>a. First of all, it should be clarified that the Integrated Border Operations Centre -CIOF- is a dependency of the Government of the Federative Republic of Brazil, whose functioning and composition is determined by the legislation of that country. To date, there is no specific cooperation agreement between Brazil and our country regarding this centre.</p>

	<p>b. In the absence of a specific cooperation agreement on this centre, this General Unit is unaware of the participation of other institutions in the aforementioned centre. <b>However, it is clarified that participation could take place within the framework of bilateral agreements between institutions, which are not binding in nature, nor do they generate responsibilities for the parties. According to informal enquiries, no national institution is represented in the CIOF in Brazil.</b></p>
Other International governments involvement	<p>a. The question refers directly to CIOF, which, as mentioned above, is an agency of the Government of the Federative Republic of Brazil, the functioning and composition of which is determined by Brazilian legislation,</p> <p>b. Idem point B.a.</p> <p>c. Idem point B.a.</p> <p>d. Idem point B.a.</p> <p>e. Idem point B.a.</p> <p>f. Idem point B.a.</p> <p>g. The consultation is of a general nature, but it is made clear that Paraguay is a sovereign and independent country, integrated into the international community.</p>
Data processing guidelines	<p>a. Idem point B.a.</p> <p>b. Idem point B.a.</p> <p>c. Idem points B.a and A.a <i>in fine</i></p> <p>d. Idem point B.a</p> <p>e. Idem point B.a</p> <p>f. Idem point B.a</p> <p>g. Idem point B.a</p> <p>h. Idem point B.a</p> <p>i. Idem point B.a</p>
Integration with other security programs	<p>a. Idem points B.a. and A.a. <i>in fine</i></p> <p>b. Idem point B.a and A.a <i>in fine</i></p> <p>c. Idem point B.a and A.a <i>in fine</i></p>

**Request #48341 - Public Ministry**

Thematic Axes	Answer
<p>Paraguayan government access to CIOF</p> <p>Other International governments involvement</p> <p>Data processing guidelines</p> <p>Integration with other security programs</p>	<p><b>[Extrato da resposta do e-mail]:</b> “This address informs that our institution is not part of the aforementioned Centre and that, after resorting to open source publications, it is understood that the CIOF deals with intelligence matters, so it is suggested that consultations made in the framework of law 5282/14 be addressed to institutions in charge of intelligence and border security policies, as well as to the Ministry of Foreign Affairs.”</p>

Additional FOIA request to ask about cooperation with CIOF and based on press note published in the Public Ministry’s website and where such cooperation was described

Thematic Axe	Answer
<p>Non applicable</p>	<p><i>Answer provided by Communication and Press Department by email</i></p> <p><b>[Extract from email response]:</b> In this sense, CIOF is a unit oriented towards cooperation with other institutions, whether in Brazil or Paraguay, through the exchange of strategic information without implying any kind of formal invitation or request for cooperation through a formal channel.</p> <p><b>[Extract from email response]:</b> This spontaneous exchange of information is fundamental to optimise tasks and achieve transnational organised crime. In other words, in these cases it is common to exchange information in the context indicated, used in the international criminal sphere, in order to expedite investigations into cases of transnational organised crime.</p> <p><b>[Extract from email response]:</b> In this case of case No. 922/2020 “Fiscal Investigation s/ Criminal Association and others”, the investigative dynamics led by the Public Prosecutor’s Office can validly count on the support of that institution or others that provide data relevant to its role, which are kept</p>



	discreet and confidential, in order to optimise prior intelligence work, before or during the initiation of a criminal case, which allows for the successful outcome of the proceedings and which allude to drug trafficking or other acts related to organised crime”.
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<b>Request #48342 - Itaipu Binacional</b>	
<b>Thematic Axes</b>	<b>Answer</b>
Paraguayan government access to CIOF Other International governments involvement Data processing guidelines Integration with other security programs	<p>“Manifestation Attended:</p> <p>Dear Dr. Mario Ovelar Director Access to Information Ministry of Justice: The General Ombudsman’s Office has received this request for information, which has been forwarded to the competent body. The same has responded as follows: “According to background we have no records on the query, in this framework we can confirm that ITAIPU Paraguay side, to date, has not received an official invitation to join the Integrated Border Operations Centre (CIOF)”, This Centre is managed by the PTI Brazil Foundation, where the Paraguayan margin to date has no involvement.</p> <p>Sincerely, Javier Coronel DP.PY”.</p>

<b>Request #48468 - Ministry of National Defence and Military Forces Command</b>	
<b>Thematic Axes</b>	<b>Answer</b>
Paraguayan government access to CIOF Other International governments involvement Data processing guidelines Integration with other security programs	<p><b>Ministry of National Defence</b></p> <p>In this regard, the requesting unit has recommended that the file be forwarded to this Directorate, requesting information on the existence of an agreement signed between this Ministry and the Integrated Border Operations Centre (CIOF).</p> <p>In this regard, the Legal Department reports that the requested information is not available in this office, and therefore it is suggested that the corresponding report from the Military Forces Command</p>

be awaited in order to comply with the request.

**Military Forces Command**

The Directorate of Policy, Strategy and Plans of the General Directorate of Operations of the Joint Chiefs of Staff of the Command of the Military Forces does not have any agreements or arrangements with the Integrated Border Operations Centre (CIOF) in its files, and enquiries made through technical channels with the Director of Army Operations show that they do not have any agreement or arrangement with the CIOF.

In accordance with the analysis carried out, in reference to Note No. 61 of the Director of the Anti-Corruption Unit and Office of Access to Information of the Ministry of National Defence dated 26 October 2021, in which he suggests referring to the General Directorate of Legal Affairs - Directorate of Standards, Agreements and International Relations of that Ministry, in order to inform whether the Ministry of National Defence or the Command of the Military Forces has signed an agreement with the Integrated Centre for Border Operations (CIOF), **it is appropriate; to reply that the Military Forces Command has not signed any agreement with the aforementioned organisation of the Federative Republic of Brazil.**

**Request #49037 - Civil Cabinet**

Thematic Axes	Answer
Paraguayan government access to CIOF Other International governments involvement Data processing guidelines Integration with other security programs	In response to your request for access to public information identified with ID 49037, please note that the Civil Cabinet adheres to the responses made by the Ministry of Foreign Affairs and the Ministry of the Interior, competent institutions in the matter of the query made. You can access them at the following links:  <a href="https://informacionpublica.paraguay.gov.py/portal/#!/citizen/request/48340">https://informacionpublica.paraguay.gov.py/portal/#!/citizen/request/48340</a>

<https://informacionpublica.paraguay.gov.py/portal/#/citizen/application/48338>

It is worth highlighting the response provided by the Ministry of Foreign Affairs, which is transcribed in relevant part as follows: “a. **First of all, it should be clarified that the Integrated Border Operations Centre -CIOF- is a dependency of the Government of the Federative Republic of Brazil, whose functioning and composition is determined by the legislation of that country. To date, there is no specific cooperation agreement between Brazil and our country regarding this centre...**”

### A. Brazil – Interviews Templates

#### *Government of Parana State*

1. How do you see, in general terms, the problem of public security in Paraná and Brazil?
2. The field of public safety has been greatly impacted by new technologies. What role do you see in new technologies in the fight against organized crime?
3. How do you see pilot projects like the Integrated Border Operations Centers, inspired by the US Fusion Centers?
4. Regarding your position at Itaipu, how do you see the structuring of the CIOF and the benefits generated by this sharing of data?

#### *Federal Police*

1. Given your vast experience in the field of public security, how do you see, in general terms, the problem of public security in Paraná and Brazil?
2. The field of public security has been greatly impacted by new technologies. What role do you see in these new technologies in the fight against organized crime? Do you think that there is any resistance to the implementation of technologies in the field of public security on the part of society? Is there any resistance from public security operators themselves?
3. As our project aims to make the CIOF visible, I would like to ask you some concepts, to make it clearer to citizens.
  - a. What is public safety? Is there any difference between public safety and intelligence?
  - b. How would you describe CIOF to someone who is a layman in the field of public security?
4. Regarding the working group for the implementation of the CIOF, could you tell us a little about this institutional process of creation of the Center?

5. Government news draws attention to the fact that in 2019 there was a technical visit to El Paso and Washington to better understand the security institutions there. How was the articulation of this visit?
6. You have a lot of experience in international operations and a great relationship with the US police. What do you think we can learn from the US in terms of fighting crime?
7. In your opinion, was the US delegation interested in building the CIOF? Does this interest remain in the operationalization of the CIOF?
8. Where did this inspiration for Fusion Centers come from? And how do they work? What are the challenges to transplant this model to Brazil?
9. How do you see the future of CIOF in the next 10 years?

#### ***Civil Police of Paraná***

1. Given your vast experience in the field of public security, how do you see, in general terms, the problem of public security in Paraná and Brazil?
2. With regard to the CIOF, you mentioned that your participation was greater in the search for information about the Center's demand. Institutionally, how did this process begin? Where did the idea for the Center come from and how did the search for information take place?
3. And what were your conclusions? Was the CIOF necessary?
4. Many reports about the Center point out that it was inspired by the US Fusion Centers. What is the reason for this inspiration? How do Fusion Centers work?
5. Government news also draws attention to the fact that, in 2019, there was a technical visit to the El Paso Fusion Center (EPIC) in order to better understand the model there. How was the articulation of this visit? In your opinion, was the US delegation interested in building the CIOF?
6. If someone who knows nothing about public safety asked you what the CIOF is, how would you describe it?

7. The field of public security has been greatly impacted by new technologies. What role do you see in these new technologies in the fight against organized crime?
8. You also mentioned that you sought information about the possibility of implementing something similar in Curitiba. How was that process? Would you say that there is a tendency to increasingly implement these integrated centers in Brazil?

## **B. Paraguay – Interviews Template**

### *Ministry of the Interior*

1. **Regarding the security issue in the Triple Border area and MERCOSUR:**
  - a. The field of public security has been greatly impacted by new technologies. As an expert on the subject: What role do you see the new information and communication technologies will play in the fight against organized crime?
  - b. According to your experience, and regarding the different initiatives at the intersection of public policies and security in the Triple Border area; do you consider that the protection of personal data and respect for the privacy of people in the mentioned territories are subject to analysis before the implementation of these policies? In case of an affirmative answer: In what way?
2. **Regarding the Integrated Border Operations Center (CIOF) and the different border security programs:**
  - a. Do you know the Integrated Border Operations Center located in the city of Foz de Iguazú? What information can you give us about it?
  - b. Do you have any information on the way in which the invitation from Brazil was given to the Paraguayan government to be part of the CIOF? What institutions were involved in this process?
  - c. To your knowledge, is there a level of integration of the CIOF database with other existing border security programs, such as the Tripartite Command, the Bipartite Command, the National Program for Segurança nas Fronteiras e Divisas (VIGIA), the Nucleo de Intelligence of the Federal Police Investigation? In what sense specifically? What kind of cooperation agreements exist [or should exist] between these parties?
  - d. Are you familiar with the involvement of private Paraguayan, Brazilian and/or foreign companies in the installation and/or operationalization of the CIOF and the potential data exchange with Paraguay? In the case of an *affirmative answer*: What kind of data protection safeguards are established with these companies for their management and protection?

- e. As an expert in the field. How do you see the structuring of the CIOF and the benefits generated by this data exchange?
- f. Could you refer us to someone who knows and has had some degree of involvement with the management and/or operationalization of the CIOF?

### **Ministry of Foreign Affairs**

1. **Regarding the security issue in the Triple Border area and MERCOSUR:**
  - a. The field of public security has been severely impacted by new technologies. As an expert on the subject: What role do you see the new information and communication technologies will play in the fight against organized crime?
2. **Regarding the Integrated Border Operations Center (CIOF) and the different border security programs:**
  - a. Do you know the Integrated Border Operations Center located in the city of Foz de Iguazú? What information can you give us about it?
  - b. Do you have any information about the way in which the invitation from Brazil was given to the Paraguayan government to be part of the CIOF? What institutions were involved in this process?
  - c. To your knowledge, is there a level of integration of the CIOF database with other existing border security programs, such as the Tripartite Command, the Bipartite Command, the National Program for Segurança nas Fronteiras e Divisas (VIGIA), the Nucleo de Inteligencia de Pesquisa da Policia Federal? In what sense specifically? What kind of cooperation agreements exist [**or should exist**] between these parties?
  - d. Are you familiar with the involvement of private Paraguayan, Brazilian and/or foreign companies in the installation and/or operationalization of the CIOF and the possible exchange of data with Paraguay? If the answer is yes: What kind of data protection safeguards are established with these companies for their management and protection?
  - e. As an expert in the field. How do you see the structuring of the CIOF and the benefits generated by this data exchange?
  - f. According to your experience, and regarding the different initiatives at the intersection of public policies and security in the Triple Border area, do you consider that the protection of personal data and respect for the privacy of people in the mentioned territories are subject to analysis before the implementation of these policies? In case of an *affirmative answer*: In what way?
  - g. Could you refer us to someone who knows and has had some degree of involvement with the management and/or operationalization of the CIOF?

**3. Regarding the EUROFRONT program:**

- a. Could you tell us a bit about the nature of the EUROFRONT program funded by the European Union, and the nature of the visits carried out between July 26 and August 2 of this year?
- b. Among the different visits that were made within the framework of the EUROFRONT program arrival, the Ministry of Foreign Affairs mentioned and accompanied a visit to the CIOF: Is there any kind of help that the EUROFRONT program is planning for the CIOF? What is the level of involvement of the Paraguayan government in this process?
- c. In a note identified by our investigation at the Ministry of Foreign Affairs, we identified that currently there is an investigator who is conducting a diagnosis on the performance of the border posts and the border needs of the three countries: At what stage is the diagnosis and how is it in relation to the CIOF? Is there some kind of preliminary report that can be publicly accessed?
- d. Is it possible for you to refer us to this international researcher in order to conduct a brief interview similar to the one we are conducting with you?



**Stakeholders Mapping Table**

Institutional actor	Function or evidence of inter-action/involvement with CIOF	Comments for visualization	
<b>BRAZIL</b>			
Ministry of Justice and Public Security	Secretaria de Operações Integradas (SEOPI)	Responsible for making decisions based on the data in this CIOF database (The database is under the responsibility of the CIOF itself, reporting directly to the Directorate of Operations). (Data Privacy Brasil, 2021a) It is also responsible for conducting the CIOF project before its implementation. (Governo do Brasil, 2021). The elaboration, organization, coordination and execution of the CIOF Project is the exclusive responsibility of the Secretariat of Integrated Operations. (Data Privacy Brasil, 2021a)	A line coming from SEOPI and in direction to the CIOF should be visible. This is the same type of line that will link other Brazilian stakeholders who actually help operate the Center.
	Departamento Nacional Penitenciário (DEPEN)	Responsible for examining the Center’s proposed object and participate in thematic groups. As for data sharing, DEPEN, through its representatives, is responsible for identifying individuals inmates in the Federal Penitentiary System and disseminating intelligence reports according to the appropriate technical channel. (Data Privacy Brasil, 2021b)	A line coming from DEPEN and in direction to the CIOF should be visible. This is the same type of line that will link other Brazilian stakeholders who actually help operate the Center.
	Polícia Federal (PF)	CIOF’s administration (Polícia Civil do Paraná, 2019) It can request information from the CIOF’s database. (Data Privacy Brasil, 2021c)	A line coming from PF and in direction to the CIOF should be visible. This is the same type of line that will link other Brazilian stakeholders who actually help operate the Center.
	Departamento de Recuperação de Ativos e Cooperação Jurídica internacional (DRCI)	Assists the Integrated Center for Border Operations (CIOF) in the analysis and processing of cooperation requests, by obtaining data and information about International Legal Cooperation, promoting guidance to local and regional authorities on the formulation of requests. and responses, in addition to fostering	A line coming from DRCI and in direction to the CIOF should be visible. This is the same type of line that will link other Brazilian stakeholders who actually help operate the Center.

Institutional actor		Function or evidence of inter-action/involvement with CIOF	Comments for visualization
		relations between national and foreign institutions in investigative matters. (Data Privacy Brasil, 2021f)	
Ministério da Justiça e Segurança Pública	Inteligência Financeira (UIF - antigo COAF)	Assistance in monitoring illegal financial transactions (Governo do Brasil, 2021)	A line coming from UIF and in direction to the CIOF should be visible. This is the same type of line that will link other Brazilian stakeholders who actually help operate the Center.
<b>PARAGUAY</b>			
Ministry of Interior		<p>Both qualified interviews with the Ministry of Foreign affairs (Answer 2.b) and the Ministry of Interior (Answer 2.b) state that there was an invitation made for the Ministry of Interior, thus, this should be visualized in the stakeholder map</p> <p>The interview with the Ministry of Interior states that while there was an invitation there is no involvement (Answer 2.f), while the Ministry of Foreign Affairs explicitly states that in preparation for the interview for this research, the Ministry of Interior brief them and told them that not much was made with the invitation (Answer 2.b)</p>	A line coming from CIOF and in direction to the Ministry of Interior should be visible. This line should be different of those that are confirmed members and have active duties within CIOF
National Police		Interview with Ministry of Foreign Affairs representative mentions explicitly that an invitation to join CIOF was made to the National Police (Answer 2.a).	A line coming from CIOF and in direction to the National Police should be visible. This line should be different of those that are confirmed members and have active duties within CIOF.
Public Ministry		<p>The documentary review mentions in this <a href="#">article</a> that Brazil opened the possibility for the Public Ministry to work jointly with CIOF.</p> <p><b>FOIA requests</b> After subsequent FOIA requests, it is</p>	No direct invitation to join CIOF to the Public Ministry. However, it seems from the DR and the FOIAs that specific cooperation has happened in the past

Institutional actor	Function or evidence of inter-action/involvement with CIOF	Comments for visualization
Public Ministry	still not possible to affirm or deny a direct invitation to the Public Ministry to join CIOF. However, the Public Ministry responded in one FOIA answer that such a Ministry is not part of CIOF. On a subsequent FOIA request, the Ministry indirectly answered that “spontaneous exchange of information is fundamental to optimise tasks” and that CIOF is oriented towards cooperation without necessarily being backed by a cooperation agreement.	and through this spontaneous exchange of information. We should include a bidirectional intermittent arrow between CIOF and the Public Ministry to showcase this connection.
Ministry of Foreign Affairs	<p>Documentary review shows in this article a visit of representatives from the Ministry of Foreign Affairs to the CIOF database, and through the EUROFRONT cooperation programme currently ongoing.</p> <p><b>FOIA Request</b> The Ministry of Foreign Affairs answered that to date there is no specific cooperation agreement between CIOF and national institutions.</p>	No direct invitation to join CIOF to the Ministry of Foreign Affairs. However, by proxy we should include a line from the Ministry of Foreign Affairs (Paraguay), connected to the EUROFRONT program, and then do the intermittent line from EUROFRONT towards CIOF.
SENAD	<p><b>Interviews</b> Interview with a representative of Ministry of Foreign Affairs mentions an invitation to the SENAD to join CIOF (Answer 2.a). Same interviewee mentions that not much has been done with the invitation.</p>	A line coming from CIOF and in direction to the SENAD should be visible. This line should be different of those that are confirmed members and have active duties within CIOF.
<b>INTERNATIONAL COOPERATION</b>		
EUROFRONT	<p>Documentary review shows in this <u>article</u> a visit of representatives from the Ministry of Foreign Affairs to the CIOF database, and through the EUROFRONT cooperation programme currently ongoing.</p> <p><b>FOIA Request</b> The Ministry of Foreign Affairs answered that to date there is no specific cooperation agreement between CIOF and national institutions.</p>	No direct invitation to join CIOF to the Ministry of Foreign Affairs. However, by proxy we should include a line from the Ministry of Foreign Affairs (Paraguay), connected to the EUROFRONT program, and then do the intermittent line from EUROFRONT towards CIOF.

Institutional actor	Function or evidence of interaction/involvement with CIOF	Comments for visualization
<b>OTHER INTELLIGENCE PROGRAMMES</b>		
Tripartite Command	Interview with Ministry of Foreign Affairs confirms that although there is currently no representation of Paraguay in CIOF, there is collaboration through the "Comando Tripartito" (Answer 2.a).	An arrow coming from Comando Tripartito and in direction to CIOF should be made visible, to showcase this apparent data exchange pointed by the Ministry of Foreign Affairs interviewee.