

Berlin, 9 January 2025

Minister Rui Costa
Office of the Chief of Staff of the Presidency
Federal Government of Brazil

cc
Minister Vinícius Marques de Carvalho
Office of the Comptroller-General

Minister Guilherme Boulos
General Secretariat of the Presidency

Subject: Concerns regarding the public response to Transparency International Brazil's PAC transparency study

Dear Minister,

Transparency International writes to express its serious concern regarding the public statement issued by the Ministry of Government (Casa Civil) in response to the recent study published by Transparency International Brazil (TI Brazil) on transparency gaps in the federal government's flagship infrastructure investment programme (PAC).

The current federal government has repeatedly and commendably emphasised the essential role of civil society, public consultations, and the meaningful involvement of civil society organisations in policy formulation and decision-making. This commitment is fundamental to democratic governance, accountability, and the prevention of corruption, particularly in large-scale public investment programmes.

TI Brazil has played an important and recognised role in policy discussions and oversight in Brazil, including through its participation in the Council of Transparency, Integrity and Anticorruption led by the Office of the Comptroller General (CGU) and in work related to the 'Secret Budget'. Its work has aimed to support public institutions by identifying risks, strengthening safeguards, and contributing evidence-based recommendations to protect public resources.

It is therefore with considerable surprise and concern that we observed the Ministry's reaction to TI Brazil's recent study. Rather than engaging substantively and constructively with the findings and recommendations - intended precisely to help safeguard a flagship government programme against corruption - the Ministry opted to publicly attempt to delegitimise the organisation's work and attack its credibility.

Of particular gravity is the Ministry's claim that Transparency International Brazil is under investigation by the Federal Police. There is no public record of any such investigation. TI Brazil has never been formally notified of an investigation, nor is there any known documentation to substantiate this assertion. This raises serious questions about how a federal government entity could claim knowledge of a purported law enforcement action, and whether confidential information is being improperly invoked for political purposes.

This episode cannot be viewed in isolation. For several years, Transparency International Brazil has been subjected to sustained legal harassment based on demonstrably false allegations and disinformation. These claims have been repeatedly rebutted not only by TI Brazil itself, but also by the Public Prosecutor's Office and the Federal Court of Auditors. The Inter-American Commission on Human Rights has already expressed concern over this harassment against TI in Brazil, recognising it as a serious case of criminalisation of a civil society organisation. It is deeply troubling that, rather than fostering democratic dialogue around the study's findings and recommendations, a federal ministry would resort to a similar approach of intimidation and reputational attack.

Such actions are inconsistent with democratic principles, the rule of law, and the government's stated commitment to civic participation. Civil society organisations must be able to conduct independent analysis and express critical views without fear of retaliation, harassment, or criminalisation. Attempts to silence or discredit them undermine public trust and weaken the very safeguards that protect public programmes from corruption and mismanagement.

Transparency International stands firmly with its Brazilian chapter and reiterates its readiness to engage in constructive, good-faith dialogue with public authorities. We respectfully call on the Ministry to clarify its public statements without delay, refrain from unfounded allegations, and reaffirm its commitment to protecting civic space and independent oversight.

We remain convinced that open engagement with evidence-based research and recommendations is the most effective way to strengthen public governance and ensure that major government initiatives deliver their intended benefits to the Brazilian people.

Yours sincerely,

François Valérian
Chair
