

National Curriculum Matrix as Theoretical-Methodological Orientation: The case of the Federal Highway Police

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ABSTRACT

The present work contextualizes the emergence of the National Curriculum Matrix (MCN) in the scenario of public security policies elaborated since the 2000s in Brazil. Based on this contextualization and considering the complexity of police work, the MCN emerged as a theoretical and methodological framework aimed at the professional training of state police (military and civil) and military firefighters. If these institutions were necessarily linked to the MCN, what about the influence of the MCN in a police institution that is not linked and has federal coverage? To answer this question, this paper analyzes, through a case study, the influence of the MCN on the Federal Highway Police – PRF.

Keywords: Public Security, National Curriculum Matrix, Police Training, Federal Highway Police.

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INTRODUCTION

The field of research is situated in the context of democratization and with security gaining more and more prominence in Brazil, where it is interesting to note that, only at the beginning of the twenty-first century, more systematic and profound approaches emerged, involving public security at various levels of governance in the country (PONCIONI, 2013).

It was up to the National Secretariat of Public Security – SENASP, created by Decree No. 2,315/1997 within the structure of the Ministry of Justice, to act as an inducer and articulator of public policies aimed at the implementation of national plans. For this reason, after two years, the National Public Security Plan (PNSP) emerged⁶, entitled Brazil Says No to Violence, which was followed by several other plans: Public Security Plan for Brazil (2003); National Plan for Public Security with Citizenship – Pronasci (2007); Safer Brazil (2013); National Homicide Reduction Program (2015), which was never implemented; the 2017 National Public Security Plan and, soon after, the 2018 National Public Security Plan; until the current PNSP of 2021, which is expected to be in force until 2030.

These plans constituted a significant articulation whose main objective was to establish a democratic governance system for public security policies, with the purpose of reducing crime and violence, generating a sense of security in society. To this end, cooperation was stimulated between the different agencies involved, in all spheres of government, which included the definition of common goals and indicators, with priority given to meeting social demands.

Therefore, the performance of police institutions, as they are the front line in contact with the population, has always been at the center of discussions, and, as Lima, Bueno and Mingardi (2016) point out, the political democratization that occurred at the end of the 1980s marked the beginning of the change in the relations between the police and society, as a result of social pressures. demanding new models of politics and policing.

In 2003, during the National Seminar on Public Security, which aimed to disseminate and stimulate training actions within the scope of the Unified Public Security System, SENASP announced actions aimed at police education, with emphasis on the creation of the National Curriculum Matrix (MCN) for police education.

The National Curriculum Matrix had the virtue of including the professional training of police officers in the governmental agenda, with the status of a public policy, considering the privileged place in the choice of alternatives and proposals for the problem that involves the performance of police officers for the effectiveness of a "citizen" public security in the country (PONCIONI, 2013, p. 50).

⁶ The first PNSP after redemocratization dates back to 1991 with the Collor government.



In 2014, the Ministry of Justice/SENASP reissued the National Curriculum Matrix – For training actions for professionals in the area of public security. The novelty was due to the inclusion of a professional study and a mapping of competencies with the objective of outlining a profile of the positions of state public security institutions, clearly proposing a transition from the logic focused on content to a logic focused on competencies (cognitive – operative – attitudinal).

Thus, the National Curriculum Matrix emerged (2003) and was consolidated (2014) as a theoretical-methodological framework guiding the initial and continuing training actions of public security professionals in Brazil. The Military Police, the Civil Police and the Military Fire Brigades have been, from the beginning, linked to the MCN, regardless of the level or modality of education that is intended to be carried out. Its articulating axes and thematic areas began to guide the most diverse programs and projects carried out by the National Secretariat of Public Security (SENASP, 2014).

Although the Federal Highway Police (PRF) was not formally among the institutions linked to the obligation to adopt and implement the MCN, the fact is that the context and reality of action have always been exactly the same as those of the linked institutions, that is, the daily life of Brazilian society, since the PRF is present in all units of the Federation.

The mission of this work is to analyze the influence of the National Curriculum Matrix on the institutional teaching of the Federal Highway Police, even without mandatory linkage.

METHOD

Since there is a lack of explicit and systematic knowledge about the influence of the National Curriculum Matrix on the educational actions of the PRF, it is considered appropriate to have a structured analysis that connects the elements that make up this research question to the conceptual domain resulting from them.

This is a qualitative research, with descriptive purposes, through a case study, using document analysis techniques and interviews, with professionals from the organization studied, carried out in 2019, within a larger research developed with the University of Lisbon – UL.

All editions of the National Curriculum Matrix were analyzed, documents selected because they are the objects of study. This stage gave rise to the documentary reference.

In this context, "the reading operations essentially aimed to ensure the quality of the problematization, while the interviews and the complementary methods especially help the researcher to have a contact with the reality experienced by the social actors" (QUIVY; CAMPENHOUDT, 1992, p. 47).

The interviews were carried out in the semi-directive modality, which allowed the contextualization and deepening of the issues of interest, being pertinent and valid for the study in



question, as highlighted by Ludke and André (1986, p.34), "in this modality the interview unfolds from a basic scheme, but not rigidly applied, allowing the interviewer to make the necessary adaptations".

Thus, the following were interviewed: a) the Executive Director of the Federal Highway Police, one of the main stakeholders in the governance of institutional learning; b) a former coordinator of the National Academy of the Federal Highway Police, for his experience as a manager responsible for the management of the institution's teaching and; c) a PRF teacher with extensive experience in the coordination of institutional educational actions, due to practical experience directly related to professional, initial and continuing education.

It is important to highlight that the interviewees were explained the objectives of the research and the interview, the reasons that characterize them as relevant sources, and the ethical issues, especially the guarantee of anonymity and that the data collected will only be used for exclusively academic purposes. The procedures were previously analyzed and approved by the Ethics Committee of the Institute of Education of the University of Lisbon.

REFERENTIAL

To achieve the objective of this study, it is necessary to understand the curricular matrix construct, and its structuring role for teaching actions, allowing to situate the performance of the National Curriculum Matrix - for training actions of professionals in the area of public security. This chapter, based on a theoretical and documentary survey, proposes to follow this trajectory.

MATRIZ CURRICULAR

A curricular matrix is a reference, a portion of what should be the curriculum taught in schools, and seeks, in theory, to establish common and consensual aspects about what should compose teaching in each of the curricular components or teaching areas. (BAUER, 2020)

Historically, educational institutions have begun to develop more structured curricula to ensure a standardized and consistent education that is able to adapt and evolve according to students' needs and interests, as well as social and cultural changes.

The origin of the concept of curriculum matrix arose with the evolution of formal educational systems, and many educators and researchers contributed to the development of this concept.

In this sense, it is worth highlighting Ralph Tyler, a renowned American educator, responsible for bringing significant contributions to the theme in the twentieth century. XX, and Hilda Taba, an Estonian-born educator who, in her book "Curriculum Development – Theory and Practice" (1962), was disruptive in considering that educational models should be based on cultural and social needs.



The curriculum of the major general subjects is essentially an effort to overcome the compartmentalization and atomization of the curriculum by combining some specific fields within broader branches. History, geography and civics education were combined in social studies. Reading, spelling, composing, and writing have been combined within the Art of Language. The specialized sciences led to general fields such as the general sciences, humanities, and physical sciences. (TABA, 1962, p. 87)

Thus, although it is difficult to attribute a precise origin to the concept, it is possible to state that the idea of a curriculum matrix, as a formalized structure for planning and organizing the educational curriculum, has evolved over time and its adoption is common at various levels of education, from basic education to higher education and professional training.

For Pestana (1998) "the matrix seems to be a way of overcoming the division, perceptible in almost every curricular proposal, between the curricular objectives and the list of contents, since it concretizes, in each descriptor, the articulation between the curricular objective (or development objective) and the content" (p.70).

In Brazilian education, the use of curricular matrices is a constant, especially after the last decades, with the expansion of the debate to ensure more consistent educational processes aligned with the needs of society. An example of this are the national curriculum guidelines and specific legislation, with emphasis on Law No. 9,394/1996, which establishes the guidelines and bases of national education (LDB), which provide guidance on the structuring and organization of the curriculum at different levels and modalities of education.

Doll (2002) argues that the curriculum should allow the creation of meaningful connections between the different contents. For the author, the curriculum should be conceived as a flexible and dynamic representation of the curriculum, being able to adapt and evolve according to the needs and interests of students, as well as social and cultural changes.

NATIONAL CURRICULUM MATRIX – FOR TRAINING ACTIONS FOR PROFESSIONALS IN THE AREA OF PUBLIC SECURITY

Despite the Federal Constitution of 1988 and the introduction of more robust public security policies from the 2000s onwards, such as the strengthening of SENASP and successive PNSPs, the Brazilian perspective on public security continued to be strongly linked and restricted to the action of police forces and the focus on the repression of crimes, a result of outdated paradigms denounced by authors such as Vargas (2020) and Fabretti (2014).

Thus, even in recent history, police and criminal justice institutions have not undergone major reforms in their structures, and the public security system has continued to accumulate demands for its policies of incomplete changes.

In this scenario, it is worth highlighting the initiative of a standardized and humanized training policy presented by the National Curriculum Matrix – For training actions of professionals



in the area of public security, which represented a guiding advance in the educational actions of all state public security forces.

Miranda (2008, p. 70) points out that the implementation of the Curriculum Matrix

[...] It raised the diagnosis of the conditions of police education, aiming at the progressive incorporation of theoretical-methodological references into the curricula and the effective transformation of professional and institutional performance. The aim was to integrate the theoretical principles into the specific contents of police work, which were traditionally associated with training.

The National Curriculum Matrix (MCN) was launched in 2003 and underwent its first revision in 2005, where two important documents were incorporated: the Pedagogical Guidelines for the Training Activities of Professionals in the Public Security Area, which provided guidelines for the planning, monitoring and evaluation of training activities, and the Curricular Network, composed of disciplines that covered content in a conceptual way. procedural and attitudinal.

In 2008, a second review of the MCN was carried out with the aim of updating and expanding it, driven by the need for support for its implementation in the states. In 2014, the current version of the MCN was presented, which brought as a novelty the focus on the competencies identified by the working groups based on the "reports of the Professional Study and Mapping of Competencies: Profile of the Positions of the State Institutions of Public Security, prepared by SENASP" (SENASP, 2014, p.20).

The realization of this mapping of competencies allowed not only the updating of the MCN, but also its improvement. It is noteworthy that the first edition, in 2003, used the Brazilian Classification of Occupations (CBO) to describe the characteristics of public security activity, an approach considered superficial and generalizing.

With the mapping of competencies, it was possible to incorporate more detailed and specific information, providing a more comprehensive and in-depth view of the needs and skills required by professionals in the area of public security.

In its 2014 version, the National Curriculum Matrix is presented as:

[...] a theoretical-methodological framework to guide the training actions – initial and continuous – of professionals in the area of public security – Military Police, Civil Police, Military Fire Brigade, regardless of the level or modality of education that is expected to be served. Its articulating axes and thematic areas currently guide the most diverse programs and projects carried out by the National Secretariat of Public Security (SENASP, 2014, p. 11 - emphasis added).

And it has the following general objective:

The public security training actions, planned based on the Matrix, have the general objective of favoring the understanding of the exercise of public security activity as a practice of citizenship, professional, social and political participation in a Democratic State of Law,



stimulating the adoption of attitudes of justice, cooperation, respect for the Law, human promotion and repudiation of any form of intolerance. (SENASP, 2014, p. 40).

To this end, the MCN is structured in articulating axes (figure 1), which establish a set of transversal contents relevant to the topics discussed in the area of public security. These contents address social problems of national scope and, therefore, should be incorporated into different disciplines, providing a reflection on the individual, social, historical and political role of professionals in training. This contributes significantly to the personal development of these professionals, stimulating moral and ethical conduct, in addition to encouraging them to constantly reflect on the professional practices they will adopt and the context in which they will be applied.

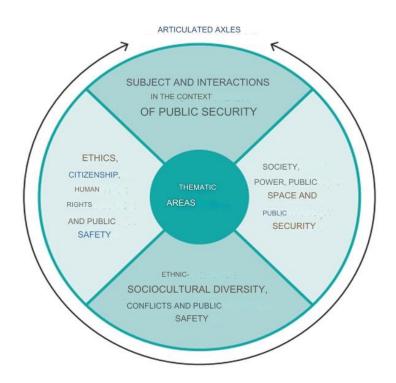


Figure 1 - Articulating Axes of the National Curriculum Matrix (SENASP, 2104, P.42)

The four articulating axes were already present in the first version of the MCN, in 2003; remained unchanged in the 2005 and 2008 revisions; and received a small increase in point four, in the 2014 version, which expanded the item to include ethnic-sociocultural diversity. All axes can be developed in curricular activities through seminars, lectures, round tables, workshops and other forms of facilitation of learning, which go beyond the logic of courses. These activities can take place both in the school environment and outside of it, related to specific subjects or to broader, contextualized projects.



The axes lead to reflection on the individual, social, historical and political roles of the professional and public security institutions. They are oriented towards personal development and moral and ethical conduct, referring to the general purposes of training actions, stimulating permanent and reflective questioning of professional and institutional practices in the social and political context in which they take place (SENASP, 2014, p. 41).

Thus, in the educational perspective adopted by the MCN, teaching is conceived as a process that demands an intentional intervention by the educator, aiming to promote learning, the construction/reconstruction of knowledge and the critical appropriation of the culture elaborated. In this context, it is essential to consider the need for quality and comprehensiveness standards that are based on ethical principles.

The intentional action of the educator encompasses the appropriate selection of teaching strategies, the creation of stimulating learning environments, and the establishment of relationships of partnership and dialogue with students. In this way, it seeks to foster the cognitive, affective and social development of students, enabling them to become critical, reflective and autonomous subjects in the construction of knowledge and in the development of skills. To do this,

The processes of construction/reconstruction of knowledge are related to the ability to learn continuously and involve, among others, the capacities of analysis, synthesis, criticism and creation, based on the exploration of different perspectives in the interpretation of reality, in the face of challenges and problematizing situations related to the area of activity. (SENASP, 2014, p. 52)

The promotion of learning takes place through the articulation between the students' previous knowledge and the contents to be learned, with the mediation of the educator. In this process, it is relevant to consider the individual and collective experiences of students, stimulating active participation, investigation, problematization and the search for contextualized solutions. In addition, it is necessary to provide an environment that supports and encourages autonomy, respecting the diversity of skills, interests, and learning paces.

The critical appropriation of the elaborated culture implies not only the assimilation of knowledge accumulated throughout history, but also the ability to reflect and question the values, beliefs and cultural practices in force. This process of critical appropriation seeks to stimulate critical thinking, contextualized analysis, and reasoned positioning in the face of issues and dilemmas present in society.

Therefore, the educational vision adopted emphasizes the importance of intentional action in the promotion of meaningful learning and the construction of knowledge, as well as in the formation of critical and reflective subjects, capable of critically appropriating the culture elaborated and acting ethically and responsibly in society.



In this regard, it is worth mentioning Canário (2013) when he highlights that "adult education, as we know it today, is a recent phenomenon [...] Conceiving education as a broad and multiform process that is intertwined with the life process of each individual, [...]" (p. 11).

To facilitate the process, the MCN presented thematic areas (figure 2) that correspond to content spaces that should be worked on by the areas of knowledge, enabling adaptations that meet the expectations of the various institutions, careers, demands of society and local and/or regional peculiarities.

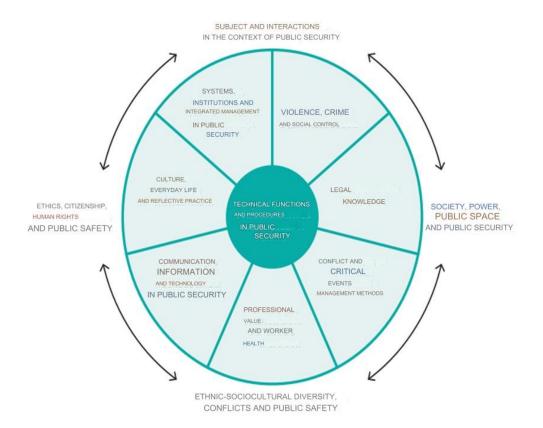


Figure 2 – Thematic areas of the National Curriculum Matrix (SENASP, 2014, p. 45)

Thus, through a dynamic of constant and intense relationship between the articulating axes and the thematic areas, a range of possible combinations for the contents is opened, which allows contributing to the unity of thought and action of professionals in the area of security, in harmony with regional peculiarities.

To this end, the MCN prescribes that,

The thematic area Functions, Techniques and Procedures in Public Security corresponds to the final implementation of the entire training process aimed at equipping the public security professional for the performance of his function. The quality of this performance is, however, linked to the cognitive, operative and attitudinal competencies contemplated by the other thematic areas. (SENASP, 2014, p. 45).



Therefore, the results resulting from the training, as proposed by the MCN, must go beyond technical performance.

RESULTS

According to what is presented in the above-mentioned reference, it was in 2003, with the launch of the National Curriculum Matrix, that, as highlighted by Miranda (2008), for the first time attention was focused on the need for technical parameters to guide the performance of the Brazilian police, in order to enable the composition of theoretical and practical references according to the following democratic principles:

- Citizenship and human rights are the ethical, normative, legal and practical references, so that training allows the construction of new cultural and structural paradigms;
- The training of security professionals should be continuous and regular;
- The pedagogical approach must enable the democratic construction of knowledge, so that the training process takes into account the representations and experiences of the actors;
- Pedagogical policies should be based on a diagnosis of the needs, needs and demands of the institutions;
- Training actions should focus on the principle of integration, encourage interdisciplinarity and cover the largest number of professionals;
- Training actions must combine methods and content that respect both the universality of citizenship and the recognition of diversity (Miranda, 2008, p. 74).

In its current version, from 2014, the National Curriculum Matrix maintained, without changes, the dynamics of the articulating axes of the thematic areas and the pedagogical orientation, but included in its text the following points:

- Professional skills extracted from the professional profile;
- New curricular network (common core) that will guide the training and qualification curricula of Civil and Military Police Officers, as well as the curricular network specifically designed for the training and qualification of Military Firefighters; (SENASP, 2014, p. 13 emphasis added).

As Rodrigues (2020) points out, although the military and civil police have different attributions, the greatest concern should lie in the aspect of how these institutions develop their actions, as "they are necessarily linked to constitutional and human rights principles and, at this point, the role of the educational process practiced in these institutions stands out as fundamental" (p. 51).

It is worth noting that until the emergence of Law 13,675 of 2018, the Federal Highway Police was not formally linked to the MCN, however, it has always been linked to the same constitutional principles as the state security forces, especially the respect and promotion of human rights.

The central point of the discussion, which now follows, is to ascertain, whether or not there was an influence of the MCN on the educational processes of the PRF, even before its obligation.



The first aspect to be considered is that the PRF, due to its capillarity, has always worked in partnership with all state police forces in Brazil, and this operational approach was naturally echoed in the integration in training actions. Thus, for the RB interviewee, it has always been common for federal highway police officers to participate in training conducted by other police forces. As it states:

Another very common practice was the solicitation or occupation by offering vacancies in external courses, as a rule of the military forces and with an eminently operational focus, especially in special operations activities, police shooting techniques and the use of motorcycles in policing or in escort and scouting. Thus, when the graduates, when they returned, they ended up multiplying their knowledge, sometimes in an organized and intentional way, and at other times by observing daily practice. (RB Interviewee)

This statement leads to the understanding that the work techniques and doctrines adopted today by the PRF teaching were greatly influenced by what was learned, over time, in the educational actions in which its police officers participated with the state public security forces. Consequence of the learning process and application in the work context, which occurred, as highlighted by the interviewee, both intentionally and through the assimilation and replication of the practice.

With regard to the influence of the MCN, specifically and directly, on PRF teaching, the interviewee RB states that it has occurred since the PRF began its transition from content-based logic to competency-based logic:

The National Curriculum Matrix, legally, it will base all the training, all the qualification, the education of military police officers, civil police officers, right..., [...], what not... it does not apply as a rule to the PRF or the Federal Police, because SENASP, which is the one that developed this Matrix, has a limitation in relation to this. It guides these police, but it has been used since the beginning, since the PRF, it is... in 2008 you started the competency-based work using the National Curriculum Matrix as your main reference, why? The first thing we have to work on is... with reference to other institutions, because we often work together, you know; secondly, because it is a job very well done and it was raised, of course, for a general reality [...] (RB Interviewee)

Interviewee JH also draws attention to competency-based teaching, especially to the competency mapping presented by MCN in 2014:

[...] The profile of what it means to be a police officer is very close. I think that it (MCN) can be used and can be used a lot with this bias – of what is the desired profile, what are the minimum and common competencies for all public security professionals, how do you develop in these professionals the necessary attitudes to, in the environment of the Brazilian social pact, right? in the vision of state and society that we have in Brazil, how the police should act and should behave. So, I think it's an important element from that point of view. (Interview JH).

It was possible to observe that the interviewees highlight, as a major influencing factor, the mapping of competencies presented by the MCN. This, apparently, refers to the fact that the PRF, as



an institution with a horizontal and complex structure, has a mapping of strategic managerial competencies, but does not have a general and complete mapping of competencies.

The National Curriculum Matrix highlights that competencies have a close relationship with the ethical, legal and technical axes that,

according to Balestreri (1998), they are present in the training of professionals in the area of public security; with the Four Pillars of Education proposed by UNESCO: learning to learn, learning to do, learning to be and learning to live together; and with the dimensions of knowledge: knowing, knowing how to do and knowing how to be" (SENASP, 2014, p. 20).

In addition, it is important to consider and reinforce the territorial scope of the PRF's action, constantly interacting with all other Brazilian police forces, in a scenario with similar characteristics, that is, Brazilian society as a whole.

In this context, cognitive and attitudinal skills, associated with the concept of transversal skills, become even more relevant and similar among different police forces. These competencies encompass skills and attitudes that are essential for the effective performance of police activities, as noted by the EW interviewee.

The Curricular Matrix brought a greater load in the area of humanities, so greater attention was given mainly to the disciplines of human relations, human rights and ethics in police training. This was a gain in relation to the Curriculum Matrix. The Curricular Matrix brings a guideline that is based on state institutions, as it covers the civil police and the military police, a workload also in these training courses is much greater than in the PRF course, this workload is much greater, and also the execution time is longer. So, the Curricular Matrix brought this benefit and also the issue of interdisciplinarity, which began to be worked on in 2009, when this process of approximation and inclusion of the Curricular Matrix in the formation of the PRF (EW Interview) began.

It is important to highlight that the MCN itself states that the implementation of a curriculum requires a relationship of congruence between contextual intentionalities expressed in everyday facts (contextual dimension); the legal and conceptual contributions (political dimension) and the appropriate conditions for its operationalization on a day-to-day basis (technical-methodological dimension). This indicates that "the actions carried out in educational spaces should be aimed at the development of the professional competencies necessary for the performance of the public security professional in the context in which social needs and requirements are established" (SENASP, 2014, p. 16).

In this sense, Poncioni (2013) presents an interesting reflection:

The Matrix offers, based on an institutional definition of the public security professional, in the case of police officers, the technical parameters for changing the theoretical-practical frameworks of professional training; proposes to break with the current paradigms of the professional training of police officers, fundamentally based on a "traditional police professional model", which mixes militaristic and legalistic principles for crime control, for the adoption of a "new" type of police professional model, which emphasizes public service, the discretion of the police officer informed by a high level of education and training, and



the search for a closer relationship between the police and the community, characteristic of democratic societies (p. 50).

Still, in relation to the advantages and disadvantages of the influence of the MCN on the training actions of the PRF, the EW interviewee highlights the positive impact on the qualification of the institution's teaching staff:

> [...] I believe that we only had gains with the implementation of the Curriculum Matrix, mainly so that the training of the instructor himself had a...., a caution of the general administration in making a periodic update of the instructors, then the qualification of the instructors, so that they are better prepared for the execution of the activities in the classroom, both in training and in qualification. (EW interview).

Finally, it should be noted that the foundations for a new public security governance were laid in 2018, with Law 13,675, which disciplined the organization and functioning of the bodies responsible for public security in Brazil, under the terms of § 7 of article 144 of the Federal Constitution, created the National Policy for Public Security and Social Defense (PNSPDS) and instituted the Unified Public Security System (SUSP).

> Article 9 The Unified Public Security System (Susp) is hereby established, whose central body is the Extraordinary Ministry of Public Security [...] § 2 The operational members of Susp are: [...]

II - Federal Highway Police;

Article 10 [...]

§ 5 The exchange of technical and scientific knowledge for the qualification of public security and social defense professionals shall take place, among other ways, through reciprocity in the opening of vacancies in specialization, improvement and strategic studies courses, respecting the peculiarities and the legal regime of each institution, and observing, whenever possible, the national curriculum matrix. (LAW 13.675 - emphasis added)

CONCLUSION

Despite the complexity of Public Security in Brazil, it can be said that the National Curriculum Matrix, presented by the National Secretariat of Public Security – SENASP in 2003, plays a fundamental role in the professional training of Brazilian police officers. The importance of the MCN lies in the fact that it establishes guidelines and benchmarks for the construction of police training curricula throughout the country.

The MCN seeks to ensure the standardization and quality of the content and skills developed throughout the training of police officers, contributing to the construction of solid and comprehensive knowledge in the technical, operational, ethical, and social areas. In addition, MCN emphasizes the importance of developing transversal skills, such as teamwork, communication, professional ethics, and respect for human rights.

Although the MCN of 2014, version still in force, is expressly directed to the military police, civil police and military fire brigades, therefore, without binding power to the Federal Highway



Police, the fact is that, due to its consistency and amplitude, it ended up guiding, theoretically and methodologically, the training actions of the PRF, especially in the structuring of a teaching aimed at the development of skills. as verified in the present work.

From Law 13,675/2018, which instituted the Unified Public Security System – SUSP, a new perspective of application for the MCN emerged, broader, aimed at SUSP members and no longer directed to state, military and civil police, and military firefighters. Thus, the next editions of the MCN should undergo changes considering this new complexity.

It is important that new research be developed for the advancement of police professional training in Brazil, even as a basis for reviewing and updating the MCN.

7

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