

Entry into force of the amendments to the General Law on Forced Disappearance, as well as to the General Population Law

Mexico City, July 22, 2025

On July 16, 2025, amendments to key public security laws were published in the Federal Official Gazette (*Diario Oficial de la Federación*, "DOF")¹, imposing new obligations to companies. Among these amended laws are (i) the General Law on Forced Disappearance (*Ley General en Materia de Desaparición Forzada de Personas, Desaparición Cometida por Particulares y del Sistema Nacional de Búsqueda de Personas*, "Law on Forced Disappearance"), as well as (ii) the General Population Law (*Ley General de Población*, "Population Law"). These amendments entered into force on July 17, 2025.

As previously reported², on March 31, 2025, President Claudia Sheinbaum presented a bill to amend both laws. After weeks of legislative review during the extraordinary legislative period, Congress approved the final versions with several noteworthy changes, as seen below:

1. Access to personal data in databases or information systems

- The Law on Forced Disappearance in effect requires private entities, regardless of their nature, that process biometric or identification data, to allow certain authorities the immediate consultation of the information on missing persons contained in their registries, databases or information systems, exclusively for their search, location and identification of missing persons.

¹ The relevant decrees published on July 16, 2025, on matters related to public security, data access, and national identity documents are:

1. Decree amending the General Law on Forced Disappearance of People, Disappearance Committed by Private Individuals and the National System for the Search for People, as well as the General Population Law, aimed at strengthening the search, location, and identification of missing persons.
2. Decree enacting the National Guard Law and amending the Organic Law of the Federal Public Administration; the Organic Law of the Mexican Army and Air Force; the Military Education Law of the Mexican Army and Air Force; the Law on Promotions and Rewards for the Mexican Army and Air Force; the Social Security Institute Law for the Mexican Armed Forces; the Military Discipline Law; the Code of Military Justice; and the Military Code of Criminal Procedure.
3. Decree enacting the General Law on the National Public Security System.
4. Decree enacting the Law on the National Public Security Research and Intelligence System.

² Click [here](#) to consult the client alert prepared by Galicia

- Previously (in the bill to amend the Law on Forced Disappearance presented on March 31), such access was required to be immediate and unrestricted, without being restricted to data related to missing persons. This adjustment reduces the risk of massive and unjustified access and better aligns the measure with the principles of necessity and proportionality.

2. Interconnection of databases with authorities

- The amendments to the Law on Forced Disappearance introduced changes to the list of private entities required to allow the interconnection of their databases with the National Identity Platform for the permanent and real-time consultation of information.
- The entities subject to this obligation include private individuals that provide financial, transportation, healthcare, telecommunications, education, delivery and courier services, among others. The list has been expanded to include providers of physical and mental healthcare services, private assistance services, and addiction treatment centers.
- However, the obligation for private institutions that manage registries or databases of individuals to allow consultation by authorities remains in place.
- In this regard, limits and safeguards have been established: authorities may only access such databases when necessary for the investigation, search, location, or identification of missing or unlocated persons, and only if a Search File has been issued or a specific investigation case number has been assigned. Moreover, the data subject to authority consultation must be directly related to the missing person.
- Finally, the Law on Forced Disappearance incorporates data protection principles and provides that the regulation must establish minimum security and traceability mechanisms. These adjustments seek to limit the use of these measures and strengthen safeguards for private parties.

3. Access to images generated by satellites, drones, or other technologies

- The Law on Forced Disappearance in effect requires individuals who generate or have access to images and measurements generated by satellites, drones or other technologies, to allow certain authorities their consultation exclusively for their search, location and identification of missing persons.
- In the bill to amend the Law on Forced Disappearance presented on March 31, such access was not restricted to the exclusive requirement that the data be related to missing persons. This restriction strengthens protection to data privacy and reduces the risk of illegal or expansive powers from authorities, aligning with the principles of proportionality and legitimate purpose.

4. Empowered authorities

- The list of authorities empowered to carry out the consultations referenced in the Law on Forced Disappearance has been expanded, as shown below:

Bill issued on March 31	Law on Forced Disappearance in effect
Prosecutor's Office, Local Prosecutors' Offices, public security institutions belonging to the Security Cabinet of the Federal Executive, as well as the National Intelligence Center.	Prosecutors' Offices, the Public Security Ministry, the National Guard and the police within the scope of their powers, as established in article 21 of the Federal Constitution, acting under the direction of the Public Prosecutor's Office, as well as the National Search Commission and the Local Search Commissions.

This is relevant considering that companies must be aware of which authorities they should allow access to the data, as long as it is duly justified by the competent authority.

What was maintained?

The following topics remained unchanged from the bill from March 31 to the July 16 publication in the DOF:

- CURP: the Population Law maintained the provisions related to the CURP, which, from now on, will be the only valid ID (for identification purposes only) for individuals of Mexican nationality or foreign nationals with regular immigration status in the country. It must be requested in the processes of validation and authentication of identity in digital media, as well as for the provision of procedures and services. However, the Population Law does not establish specific penalties in the event of non-compliance with this obligation.
- Search forms: the Law on Forced Disappearance maintained the provision that obliges private entities that have the capacity to massively broadcast information, to disseminate search forms issued by the corresponding authorities.

Finally, as mentioned, the amendments to both laws came into force the day after their publication, although additional transitory provisions are also established with deadlines and special rules for the operation of the National Identity Platform, CURP, among others.

For further information, please do not hesitate to contact Xavier Careaga (TMT AI Counsel – xcareaga@galicia.com.mx).

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