


Civil Society Organisations and the Extractives Industries in Myanmar – A Brief Overview

The logo for the Myanmar Centre for Responsible Business features a green and yellow rectangular background with the text "Myanmar Centre for Responsible Business" in white and yellow.

This paper draws on work undertaken for MCRB's Sector-Wide Impact Assessment (SWIA) on Oil and Gas and MCRB's ongoing engagement with civil society. More information on engaging with civil society can be found in Chapter 4 (Project Level Impacts), and Chapter 7.2 (Recommendations to Companies). Location-specific advice on Rakhine and Mon/Tanintharyi is provided in Chapter 6 of the SWIA.

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Civil Society Organisation Typology

It is possible to distinguish different types of Myanmar civil society organizations (CSOs), such as faith-based, trade and student unions, human rights organizations, or aid-providers. Community-based organisations (CBOs) can be defined as those operating only at the local level, providing development and other assistance, and sometimes mediating between communities and local government. 'NGO' can refer to Myanmar NGO (MNGO or local, LNGO) but is generally used in Myanmar to refer to internationally based non-governmental organisations (INGOs) who have a Myanmar presence e.g. Oxfam.

Historical Context¹

Despite many decades of government surveillance and restrictions, civil society and community-based organizations are active in Myanmar at both the national and local levels, including in ethnic minority areas. In the aftermath of Cyclone Nargis in May 2008, pre-existing and new Myanmar civil society networks organized and greatly expanded as they worked to help survivors. They have developed into a significant positive force in the country. Since the 2011 reform process began, the Myanmar government has granted greater latitude to civil society groups, with new opportunities for them to increase their activities to help people claim their rights, including in local communities. Some organisations have been able to engage with the government, although others find it difficult to do so.

Before 2011

During successive military government rule from 1962 – 2011, civil society organizations, including trade unions, student unions, and advocacy groups were declared illegal and suppressed by the authorities under the provisions of various laws, most notably the colonial-era 1908 Unlawful Associations Law. Under Article 15(2) (b) of this law, any association can be declared unlawful if the head of state so deems it. While the law, which is still on the books, was used by the government to imprison members of armed opposition groups, it was also used to target peaceful

¹ Much of this section is drawn from "[Civil Society Gaining Ground: Opportunities for Change and Development in Burma](#)", Transnational Institute/Burma Center Netherlands, November 2011

opposition activists. Under Law No 6/88 (“Law Relating on Formation of Associations and Organizations”), a decree issued in the wake of the September 1988 coup, all organizations were required to seek permission from the authorities to operate or they were not allowed to function. It appears that if a group did not register according to Law No 6/88, it could be considered illegal and hence its members penalized under the provisions of the 1908 Unlawful Associations Act.²

Following the 1988 coup, the government set up its own organisations (known as GONGOs – government organized non-governmental organisations), most notably the Union Solidarity and Development Association (USDA) established in 1993. The authorities stated that its membership was 24 million people, but most of them were effectively forced to join. In April 2010 the USDA was transformed into the Union Solidarity and Development Party (USDP), which gained the most seats in Myanmar’s November 2010 general elections, in the face of a boycott by the National League for Democracy (NLD) and widespread criticism that the elections were neither free nor fair. Other GONGOs include the Myanmar Maternal and Child Welfare Association and the Myanmar Women’s Affairs Federation, whose top leadership generally consisted of the wives of senior military.

During military rule, faith-based and other organizations providing assistance to local communities were able to operate in-country, albeit often under the radar. Environmental organizations, organizations working on community development, and groups working on women’s rights and with people living with HIV/AIDS began to be established during the late 1990s, some of them registering as service companies to avoid problems trying to register as an NGO. Moreover, after the military government began agreeing a series of ceasefires with ethnic minority armed opposition groups in 1989, civil society took this opportunity to begin new initiatives in ethnic minority ceasefire areas. Two of the most important groups formed during this period are Metta Development Foundation and Shalom. Both worked initially in Kachin State following the 1994 ceasefire there, before expanding to other areas of the country.

Private sector CSOs were established by the local business community. These include the Myanmar Business Coalition on Aid (MBCA) and the Myanmar Women’s Entrepreneurs Association (MWEA). The Union of Myanmar Federation of Chambers of Commerce and Industry began life as a GONGO, and still has privileged access to government through trade missions, contacts and consultation, but is gradually transferring into more of a member-driven business organisation.

Following the 1988 coup, many Burmese organizations were established in exile, primarily in Thailand. After the military’s violent suppression of the 1988 pro-democracy movement, hundreds of students who had led the movement fled the country, where they remained for over two decades. They organized primarily Burman-led political advocacy organisations which were mostly funded by Western governments and organisations and focused on human rights violations. Other groups formed during that time were ethnic minority based and are still active today. Since 2011 some formerly Thai-based organizations have begun to work within the country and openly participate in meetings in Yangon and elsewhere, providing an important injection of capacity and international knowledge.

Situation in 2014

Both government policy and new laws increased political space for civil society. But civil society has itself created more space through advocacy with the government

² “[Myanmar: Justice on Trial](#)”, Amnesty International, AI Index No 16/019/2003, July 2003

and other less direct methods. However the space to operate, including for advocacy activities, is generally far more restricted outside of Yangon, both in post-conflict areas, but also in heartland Bamar rural areas where the authorities have yet to fully absorb the reforms of the last few years. Organizations working outside of Yangon may be under greater surveillance and restrictions by local authorities. Because Yangon is a large city with scores of Myanmar and international organizations, there is less active government scrutiny of their activities, or at least such surveillance is much less visible (perhaps because it is now easier to conduct surveillance via Facebook – FB – rather than Special Branch - SB!).

A key recent development relating to CSOs was the enactment of the ‘Law Relating to the Registration of Organizations’, in July 2014 by parliament (which repeals Law No 6/88 described above.) It sets out the requirements for the registration of both Myanmar and international organizations. Importantly, the law does not mention any penalties for Myanmar organisations which do not register under the provisions of this law. Indeed, many Myanmar Civil Society Organizations and Community Based Organizations (CBOs), including who those who participate in the Myanmar Extractives Industry Transparency Initiative (MEITI), have not registered with the government.

In December 2011 the Parliament enacted the Law Relating to Peaceful Assembly and Peaceful Procession, which permits peaceful assembly for the first time in several decades. However, prior permission from the Government (in this case the Township Police) is still required for an assembly/procession of more than one person and the requirements for seeking such permission are unduly onerous. Moreover, Article 18 of the current law has often been used to target activists and human rights defenders, many of whom have been arrested and imprisoned under its provisions. In addition, Article 18 of the law acts as a significant deterrent as it provided for up to one-year imprisonment for those who demonstrate without prior permission. Parliament amended the law on 19 June 2014; new amendments now reportedly oblige the authorities to grant permission for peaceful demonstrations unless there are “valid reasons” not to do so, and punishment for failing to seek prior permission and holding a demonstration without such permission was reduced from one year to six months. However, the amended law still provides for the arrest and imprisonment of peaceful protesters, and such arrests have increased in 2014.

Although the provisions of the Peaceful Assembly Law are overly restrictive, they do permit demonstrations and processions for the first time in decades. Furthermore, now that the government is beginning to respect the rights to freedom of expression, peaceful assembly, and association, civil society and communities have increasingly exercised these rights by speaking out publicly and openly working with one another. For the first time in some 50 years, independent trade unions are legal, and well over a thousand labour unions have been formed, mostly at the enterprise level.

Media freedom has also significantly increased over the last two years. Pre-publication censorship was lifted in August 2012 and new daily and weekly newspapers and journals have mushroomed including at sub-national level. Media freedom is far from absolute however, particularly when reporting on specific corruption cases or the military’s interests. The authorities have arrested and imprisoned several journalists in the last six months. However these arrests are now widely publicised in the media, and, unlike previously, the media and the authorities engage with one another to try to resolve problems.

Civil society organisations have also benefitted from increased funding from Western governments and organisations and to a lesser extent, Asian funders, particularly

from Japan. Many donors have specific programmes focused on capacity building for CSOs to strengthen their ability to work on government and corporate accountability. These donors are also more regularly consulting CSOs on their programmes.

Two coordinating organisations, the Local Resources Centre³, and the Myanmar Information Management Unit⁴ (established 2007), provide a platform for CSOs to coordinate and share information, including with donors and INGOs, and offer capacity-building. However the participating CSOs tend to be more focused on development issues rather than corporate accountability.

Civil society and the extractives industries, including oil and gas

Civil society groups are increasingly focusing on corporate behaviour and the negative impacts of business as the country opens up to investment. Many of the negative impacts are occurring as investment increases in ethnic minority areas previously closed due to armed conflict. CSOs are monitoring and reporting on impacts and abuses, and in some cases working with local communities to help solve problems related to business activities in their areas as they arise. Most CSOs, including those with a business focus, are engaged in multiple activities – for example, in development and training on the one hand, and in advocacy activities on the other.

For rights-based CSOs, their focus is on ‘social justice’. They perceive that this cannot be assured by existing laws (i.e. ‘legal justice’) since they view existing laws as unjust. Better and more meaningful consultation, engagement and mediation between companies, civil society and business is seen as one way to address this.

Myanmar Alliance for Transparency and Accountability (MATA)

Myanmar’s decision in 2012 to apply for membership in the Extractive Industry Transparency Initiative (EITI) has been an important driver for CSO focus on extractives, and greater networking, not least to determine the nine civil society members of the multi-stakeholder group (MSG) (see Table 1 below).

The Myanmar Extractive Industry Transparency Initiative (MEITI), a Multi-stakeholder Group (MSG) comprising civil society, extractive companies, and the government was established in February 2014⁵, and Myanmar was admitted as a candidate country to the EITI in July 2014. The next step for the government is to implement the EITI standard, involving the disclosure of all payments made to the government by the extractives sector, among other commitments.⁶

To coordinate the civil society input into this multi-stakeholder process, a coalition of national civil society organizations started to work together as the Myanmar Coalition for Transparency (MC4T). This network was formally established in April 2014 as the Myanmar Alliance for Accountability and Transparency (MATA) a nationwide umbrella organization of 449 CSO/network and individual members from all States and Regions, a first for Myanmar⁷.

³ <http://www.lrcmyanmar.org/>

⁴ www.themimu.info

⁵ “[Myanmar – Joining the Path to Resource Transparency](#)”, Emma Irwin, Technical Advisor to EITI, 18 July 2014

⁶ “[Myanmar admitted as EITI Candidate](#)”, EITI, 2 July 2014

⁷ See pages 140-167 of [Annex 10 of the MEITI application](#)

Table 1: Civil Society members of the MEITI multistakeholder group (MSG)⁸

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U Wong Aung @ Tun Win Kyaw	Director	Shwe Gas Movement	wongaung@gmail.com Tel: 09-450023878
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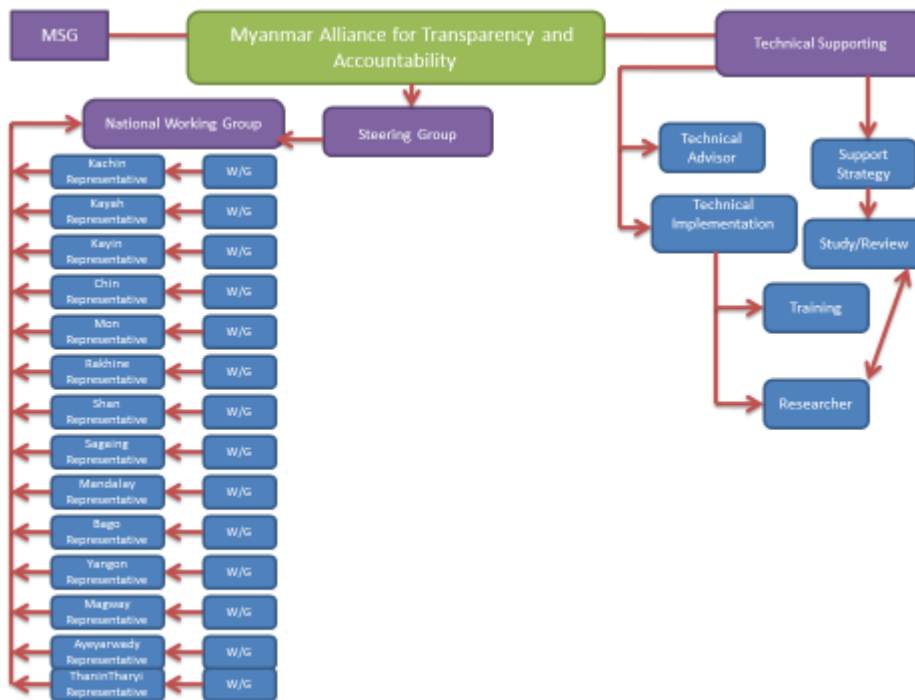
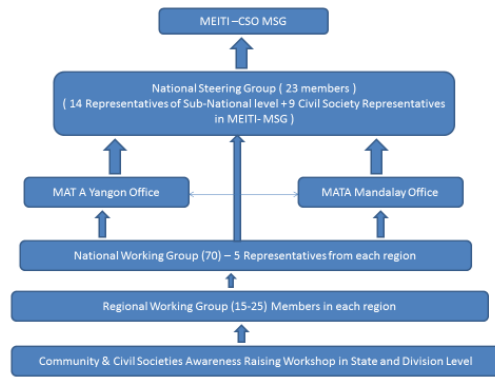
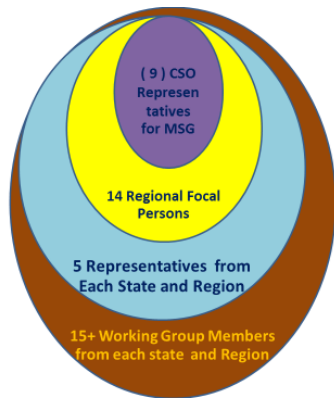
MATA's objectives are:

- To advocate for transparency and accountability by government, elected representatives, companies, donors and civil society.
- To promote the freedom of public participation in, and scrutiny of, Myanmar's legal frameworks and guidelines relating to resources.

MATA receives financial and technical support from a number of donors and international organisations including Natural Resources Governance Initiative (NRGI, formerly Revenue Watch). MATA's current focus is on EITI, corruption and timber. However it has ambitions for a wider corporate accountability agenda, when its capacity and resources permit.

MATA's structure is national and subnational and includes a Steering Group and Technical Working Group at national level. The Steering Group includes a number of prominent Myanmar civil society leaders from Myanmar-China Pipeline Watch Committee, ECODEV/ALARM, Paungku, Myanmar Green Network, and Shwe Gas movement. Many of these groups are also represented on the MEITI multi-stakeholder group (see Table 1).

⁸ Source [MEITI application Annex 10](#)



The interests and agendas of MATA members are shaped by recent controversies and experiences concerning the extractives in Myanmar (see Annex for examples).

Particular EITI-related priorities of the members of MATA, in addition to full transparency over national and local government revenue, and contract transparency, are information about budgets for local community development, any equity share for regional government, budgets and measures for environmental safeguards, including liability arrangements, compensation for land acquisition, and company mechanisms for addressing grievances of, and resolving disputes with, local communities.

MATA members are also interested in greater transparency around beneficial ownership, including, but not limited to the extractives. This relates to wider concerns about 'cronies' whom they define as individuals/companies with a history of involvement in narcotics trafficking, human right abuses, and corruption, whose behaviour and interests risk impeding the democratic process. MATA members are particularly concerned that companies who invest in Myanmar should not establish business links with those they consider 'cronies', and their families unless those individuals/companies take steps to redress past wrongs and adopt transparent and responsible business practices.

Current and future trends

Some of the emerging trends relating to CSOs and companies' interaction with them include:

- **Consultation overload:** International financial institutions, UN organisations, donors, and companies are all increasingly holding 'consultations' on their expanding programmes with civil society organisations. CSOs welcome genuine consultation but have limited capacity and funding to engage in it. CSOs are becoming wary of what they consider to be one-way and high-level presentations from organisations intended to allow them to tick the box and claim consultation has occurred. They are looking for meaningful consultation, conducted in an efficient way.
- **Partnership overload:** Some CSOs, particularly those in niche areas such as extractives or ICT are overwhelmed by requests for information, partnership, and assistance from donors, international NGOs and companies (who at the same time are poaching their key staff). There is a risk that local civil society will be distorted by the rapid influx of a wide range of international actors.⁹ Many local organisations have reported that their main weakness is related to financial management, with an additional need for training in project management and reporting, in order to meet donor requirements. Some observers have noted that giving large grants without adequate support may be counter-productive and create disputes among organizations.¹⁰
- **A less favourable operating environment:** While many developments such as the Registration Law generally increase the space for CSOs to operate, there have been some worrying recent developments such as the arrests and imprisonment of several local journalists during the first half of 2014; the continued arrests of demonstrators, many of them protesting against land grabs, under the 2011 Peaceful Assembly Law; and unchecked inter-communal violence (SWIA Chapter 4.6 and Chapter 6.1). The run-up to the General Elections expected to take place in November 2015, the uncertain Constitutional amendment process (SWIA Chapter 2), and the ongoing peace talks with armed ethnic minority groups (SWIA Part 4.5) are all factors which have led and may lead to greater tensions between civil society and the government, and within civil society itself.

Building relationships with Myanmar civil society – some pointers

In view of the above context, the following suggestions are made to help companies in building relations based on trust with civil society organisations:

- Be transparent. Proactively share information and communicate. Provide a comprehensive explanation about the company's planned or existing activities in Myanmar. Assume little or no knowledge of the company and its operations in initial contacts (unless the CSO works specifically on that case). Some of the larger Myanmar civil society organizations (CSOs) will have met with international companies, but many of the smaller ones, especially community-based organizations (CBOs) outside of the major cities, will probably not have had such contact. To provide an evidence base for discussion, consider sharing monitoring reports pro-actively with CSOs and CBOs, in an accessible form, or even carry out joint monitoring.
- Monitor and respond rapidly to rumour and inaccurate local media coverage and have a clearly signposted, informed and empowered spokesperson and/or community liaison officer. Many Myanmar media publications are not

⁹ See for example "[Burma in the Balance: The Role of Foreign Assistance in Supporting Burma's Democratic Transition](#)", Project 2049 Institute, March 2012.

¹⁰ [Civil Society Gaining Ground: Opportunities for Change and Development in Burma](#)", pp. 39 and 43, Transnational Institute/Burma Center Netherlands, November 2011.

used to checking facts with companies; this is partly because many companies don't invest in personnel for external communications. Communities want a one-stop shop with whom they can raise questions and concerns

- Meet with a variety of CSOs/CBOs, both at the national and local level. At the national level, this could mean meeting with environmental and human rights groups for example. At the local level, this could mean a faith-based group, a women's group etc.
- CSOs/CBOs in Myanmar face many demands on their time so keep meetings focused, and tied to specific issues and questions. Be aware that leaders of CSOs who speak English face even more demands as international actors constantly seek them out for their insights.
- Provide written material in the Burmese language, and in good time (e.g. two weeks), to allow groups to consult amongst their membership.
- Attempt to meet with CBOs/CSOs without the presence of the authorities (this may be more difficult at local level). Build trust by keeping the details of meetings with them confidential and assure them that you will do so.
- Some CBOs/CSOs may be reluctant to accept assistance, whether financial or in-kind, from businesses, so be aware of any potential sensitivities. If your company does intend to provide financial assistance to a CSO/CBO, ensure that they have adequate financial systems in place to account for such funds or, as part of your support, provide in-kind expertise or funds to provide CBO with capacity building on financial and project management.
- When planning any CSR projects in the area of operations, explain the company's social investment strategy and consult with communities/CBOs and their leaders about what they think is needed.
- When meeting with local CBOs in the company's area of operation, be sure to ask detailed questions about the history of land tenure in the area. There are many land disputes in Myanmar, partly due to a lack of clarity about complicated and overlapping laws and practices.
- Be aware of ethnic/religious diversity in Myanmar. Such diversity is not readily apparent to non-Myanmar people, so take time to research areas where your company plans to operate, and understand the diversity and potential biases of your local staff.
- When operating in ethnic minority areas, take into account that some communities may have recently emerged from armed conflict. There may be overlapping spheres of influence between local government authorities on the one hand, and armed ceasefire groups on the other. Some ceasefire groups have established their own administrations covering areas such as education and health for example. Do research and take expert advice and the time to understand the relationships of local CBOs with the local government and ceasefire armed groups.
- Coordinate with other companies to reduce the consultation burden, and engage with civil society through collective and multi-stakeholder initiatives such as MEITI. Where MEITI's current framework does not support the topics under discussion, MCRB stands ready to support such engagement and dialogue.

Further relevant pointers and recommendations can be found in Part 7.2 of the Sector-Wide Impact Assessment.

Annex: Recent controversies in the extractives industries in Myanmar

In Myanmar, the main sectors characterised by disputes between companies and communities are the extractive industries, energy – both hydro and coal power, economic development zones and agriculture. The primary point of company/community tension tends to involve land, but pollution, lack of economic benefits, and labour conditions have also been important concerns.

Major cases from the last two decades, including allegations of abuses by security forces associated with extractives projects, colour CSO perceptions about mining and oil and gas. Recent examples include:

Letpadaung copper mine: The community dispute has yet to be resolved concerning the expansion of Letpadaung Copper Mine in Sagaing Region operated by Myanmar Yangtse Copper Mine Ltd, part owned by Chinese-owned mining company Wanbao). Wanbao, a subsidiary of Norinco, is in partnership with the Union of Myanmar Economic Holdings (UMEHL), one of the two major military-owned companies, as well as a state Mining Enterprise. A period of company/community tensions, mostly focused on land issues, came to a head in November 2012 when the security forces fired white phosphorous at peaceful protesters, severely burning some of them, including Buddhist monks. Afterwards work was suspended until late 2013, and the government appointed a high-profile commission of inquiry into the incident headed by Daw Aung San Suu Kyi.

The situation was exacerbated by the fact that one of the villages in the Letpadaung area is near a UMEHL-owned sulphuric acid factory which local people and environmentalists say is polluting the soil, air, crops and water.¹¹ Some of the locals, who are now split following the company's provision of more generous compensation, continue to protest against land confiscation. In May 2014 three workers from a Wanbao contractor were briefly abducted and released unharmed by people demanding the cancellation of the project¹².

Wanbao has reported that they have already spent \$1.3 million on corporate responsibility projects in 2013 and if and when the mine opens, the company will spend 2% of the profits to help the local community. Wanbao also says that it has created almost 4,000 new jobs in the area.

In 2013 an Environmental and Social Impact Assessment was undertaken, benchmarking against international standards including those of the IFC. The report was disclosed in January 2014¹³ but public consultation and discussion of it has been limited, including at national level, contributing to a continuing negative view of the project.

The **Tagaungtaung nickel mine and smelter** operated by China Non-Ferrous Metals Corporation (CNMC) in Tigyaing Township, Sagaing Division has also attracted local and CSO criticism, with a particular focus on pollution and the absence of local economic benefits including failure to hire and develop Myanmar managers.

¹¹ “[Eight Detained as Opposition to Burma’s Letpadaung Copper Mine Continues](#)”, The Irrawaddy, 5 February 2014.

¹² “[Kidnapped](#)”, The Economist, 24 May 2014.

¹³ <http://www.myanmaryangtse.com.mm/en/latest-news/177-letpadaung-copper-project-a-brief-on-the-draft-esia-report.html>

Shwe Gas Pipeline The ‘Shwe Gas Pipeline’ comes on shore from the Bay of Bengal at Kyaukphyu, Rakhine State, crosses Myanmar and enters Yunnan Province in China. Several Myanmar and international NGOs have researched and reported its impacts.¹⁴ The Thailand-based civil society organization the ‘Shwe Gas Movement’ and the international NGO Earthrights International have reported on land confiscations, damage to traditional fishing grounds and other abuses during the pipeline construction.¹⁵ In September 2013 10 people who organized a protest against the Shwe Gas Pipeline were sentenced to two months’ imprisonment in Kyaukphyu for demonstrating without a permit under Section 18 of the Peaceful Assembly Law, and released the next month.¹⁶ The Myanmar-China Pipeline Watch Committee monitors the environmental and social impacts of the pipeline. Badeidha Moe, a CSO, organized a community-based impact assessment of parts of the pipeline in 2013, and also arranged a photo exhibition of its impacts on the environment.

Earlier pipelines were also a cause of controversy. Earthrights International reported on human rights abuses associated with the **Yadana Gas Pipeline** running from the Andaman Sea across Tanintharyi Region into Thailand, operated by Total and Chevron. Historical allegations have included forced labour and violations of property rights.¹⁷ In relation to such allegations, in 1997 the US federal district court in Los Angeles, California agreed to hear the case *Doe v. Unocal*, brought by Myanmar nationals from the Yadana pipeline area. In March 2005, just before a trial was due to begin, Unocal agreed to compensate the plaintiffs, a settlement which ended the lawsuit. Shortly thereafter, Unocal was acquired by Chevron.¹⁸

Finally, ethnic minority-based civil society organizations have reported on abuses associated with companies in Kayin, Mon, and Shan areas. The Karen Human Rights Group’s “Losing Ground: Land conflicts and collective action in Eastern Myanmar” reports on **land confiscations**, some of them **related to mining, hydropower, logging, and plantation agriculture**.¹⁹ The Human Rights Foundation of Monland issues frequent reports on land confiscation and extortion in Mon areas, some of them associated with plantation agriculture.²⁰ The Shan Human Rights Foundation has reported on human rights violations and violations of international humanitarian law in the context of the Myanmar army’s counter-insurgency activities for many years, but also occasionally issues reports on businesses - most recently on gold mining in the Shan State.²¹

¹⁴ <http://www.earthrights.org/campaigns/civil-society-reports-statements-shwe-and-myanmar-china-oil-and-gas-projects>

¹⁵ See “[Sold Out](#)”, Shwe Gas Movement, September 2011, and “[There is no benefit, they destroyed our farmland](#)”, Earthrights International, April 2013

¹⁶ See for example “[Court Reduces Prison Time for Detained Arakanese Activists](#)”, The Irrawaddy, 25 October 2013

¹⁷ See for example “[Total Impact](#)”, September 2009

¹⁸ see for example [Doe v. Unocal Case History, Earthrights International](#)

¹⁹ “[Losing Ground](#)”, March 2013

²⁰ See the website www.rehmonya.org

²¹ “[Eastern Shan State villagers call for an immediate end to destructive gold mining operations](#)”, 16 July 2014