To: H.E. Dr Vivian Balakrishnan, Minister of Foreign Affairs Singapore

Open letter regarding Singapore’s response to business linked to Myanmar junta

Your Excellency,

We, the undersigned organizations, urge you to take meaningful and concrete action to block the Myanmar military junta’s access to arms, dual-use goods, technology and funds, which are used in its ongoing campaign of terror against the people.

We specifically ask you:

to expedite and make public investigations into Singapore-based companies involved in and enabling the transfer of arms and dual-use goods and technology transferred, transited, shipped or brokered through Singapore to the Myanmar military;

introduce sanctions to prevent the direct and indirect transfer of arms, dual-use goods and technology to the Myanmar military;

block the Myanmar junta’s access to Singapore’s financial system through targeted sanctions.

Since its attempted coup on 1 February 2021, the Myanmar military has killed more than 3,800 people, detained more than 23,000 and displaced more than 1.6 million. The Myanmar military has scorched at least 70,000 homes and razed villages to the ground. They have weaponized and blocked humanitarian aid, depriving the people of food, water and basic needs. They have even attacked schools and hospitals. Compared to last year, there is a 33 percent increase in indiscriminate airstrikes in the first half of 2023, according to the UN. The Myanmar military can continue to commit these atrocities because countries including Singapore continue to allow—or fail to prevent—the transfer of arms, dual-use goods and technology to the military junta and continued access to their banking systems.

In our view, the best way to hinder the Myanmar junta from continued access to funds, arms, dual-use goods and technology is through an autonomous sanctions regime on Myanmar by Singapore that goes beyond a principled oral expression of commitment in response to investigations by the UN and human rights organizations.

As Your Excellency is aware, in 2023, several reports have raised concerns over the fact that Singapore is a major jurisdiction for the transfer of various items—in particular dual-use goods and technology—intended for use by the Myanmar armed forces. A May 2023 report by the United Nations Special Rapporteur on the situation of human rights in Myanmar identified at least 138 Singapore-based firms that had acted as intermediaries for the Myanmar military, and
highlighted how these firms had shipped arms and related goods worth $254 million USD to Myanmar between February 2021 and December 2022. This follows a report by the activist group Justice For Myanmar which named 38 Singapore companies and their directors and shareholders that have brokered arms and equipment to the Myanmar military and a report by the Special Advisory Council for Myanmar (SAC-M), that highlighted how Singapore continues to function as a strategic transit point for potentially significant volumes of items—including certain raw materials—that feed the Myanmar military’s weapons production industry.

We understand that since the release of these reports, investigations into the conduct of the companies have been initiated by your Government. We welcome these investigations and ask you to expedite them and make public the results.

The May 2023 report by the UN Special Rapporteur also noted that arms dealers move hundreds of millions of dollars through Singaporean banks to supply the Myanmar military. Many Myanmar companies—including companies directly associated with the junta—have offices in Singapore. It is routine practice for companies with direct ties to the Myanmar military to place funds in Singaporean banks. Despite some Western sanctions imposed, most of these companies continue to operate freely, providing a conduit of weapons, munitions and spare parts as well as dual-use items and technology to the junta and through the banking system. We note, in particular, the serious allegations that substantial foreign reserves of Myanmar are suspected to be held in Singapore, providing a financial lifeline for the junta.

The long-standing and well-documented reliance by military-linked companies on the Singaporean banking sector gives Singapore more influence on Myanmar than most other ASEAN member states. It is our view that the degree of cooperation from Singaporean banks will have a major impact on the effectiveness of sanctions on the Myanmar junta.

A legal memorandum from international barristers Felicity Gerry KC and Daye Gang, published by Justice For Myanmar, also concluded that Singapore has an international legal obligation “to investigate, prevent and cease transactions that amount to wrongful acts”, which are applicable to business transactions with the Myanmar military and its business interests. While we appreciate the circular reportedly issued by the Monetary Authority of Singapore (MAS) calling for enhanced due diligence measures to detect and mitigate the risks associated with higher-risk customers and transactions related to Myanmar, and the June 2023 statement by MAS noting that financial institutions should continue to be alert to the heightened risks arising from the situation in Myanmar, much more needs to be done. This includes targeted sanctions against military businesses and an autonomous sanction regime that will stop Singapore-registered companies directly and indirectly procuring arms and dual-use goods and technology for the Myanmar military.

On 14 February 2023, during a parliamentary hearing addressing the report by SAC-M, your Excellency confirmed Singapore’s commitment to not authorize the transfer of dual-use items which have been assessed to have potential military application to Myanmar where there is a serious risk that they may be used to inflict violence against unarmed civilians, and that the
The government of Singapore would not hesitate to take action against those who contravene relevant laws, including Singapore’s Strategic Goods (Control) Act. This commitment is significant as Singapore is the third largest source of arms and dual-use goods for the Myanmar military after Russia and China. However, it is concerning that half a year later, your Excellency’s expressed commitment has only been communicated orally, and we have not yet seen a policy commitment that includes consequences for non-compliance.

During the parliamentary hearing, you noted that specifically on military sales, there had been no transfers of arms to Myanmar in recent years. While this is welcome, the problem, as we see it, is not a question of transfers of conventional arms to Myanmar, but the numerous times that dual-use goods and technology that originates from or transits Singapore—whether transferred directly or indirectly to the junta—has ended up in the hands of the Myanmar military.

Your Excellency, we therefore ask Singapore to adopt and implement export restrictions on Myanmar. This would follow the recent precedent of restrictive measures applied by your government to Russia, pursuant to which applications to export military items, controlled electronics, controlled computers, and certain telecommunications and encryption items to Myanmar would be rejected. In addition, financial measures targeted at designated military-controlled banks, entities and activities should be put in place to restrict the military’s ability to finance its acts of terror against the people. Recent sanctions imposed by the US on Myanmar’s main portals of foreign currency payments, the state-owned Myanma Foreign Trade Bank (MFTB) and Myanmar Investment and Commercial Bank (MICB) should set the example in this regard. A failure by Singapore to act would sustain the current crisis whereby MFTB and MICB facilitate foreign-currency exchange within Myanmar and enable transactions between the military junta and foreign markets to buy arms, dual-use goods, technology and jet fuel, and to undermine the effectiveness of the US sanctions on these entities.

While Singapore continues to call for immediate cessation of violence under ASEAN, Singapore-based businesses and the financial system’s involvement in the transfer of weapons and dual-use goods to the Myanmar military directly undermines ASEAN’s credibility. We the undersigned CSOs strongly urge Your Excellency to set a precedent for the region by taking robust and tangible actions to stop Singapore businesses and financial institutions from enabling and being complicit in the Myanmar junta’s ongoing atrocities. As ASEAN is conducting a review of implementation of the failed Five-Point Consensus, these meaningful steps of Singapore will assist ASEAN in reforming the current ineffective approach and replacing the Consensus with concrete actions to address the crisis effectively.

Sincerely,

A total of 200 organizations, including 4 groups that can't be named because of security reasons, have signed this letter.

1 8888 Generation (New Zealand)
2 စာရင်းများခေါ်ဆိုခဲ့သည်။
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International Campaign for the Rohingya
Japan Myanmar Help Network - JMHN (comprising of over 40 youth groups in Japan)
Justice For Myanmar
K'cho Ethnic Association
Kachin Association Norway
Kachin State Civilian Movement- KSCM
Kamayut Scout Channel
Kanbauk Defense Force (KBDF)
Karenni Society New Zealand
Karenni Association - Norway
Karenni Wellington Community
Kyauktada Strike Committee
Kyimyindaing Scout Channel
La Communauté Birmane de France
LA2M
Lanmadaw, Latha & Pabedan Scout Channel
League for Democracy in Burma( Japan )
Legal Aid for Human Rights (Southern Shan State)
LGBTIQ (လိင်စိတ်ခံယူမကွဲြပားသူများ)
Mayangone News
MIIT များတင်ဆက်သတ်မှတ်ရေးဦးစီးချုပ်
Minority Affairs Institute (MAI Myanmar)
Muslim Youth Network
Myanmar Community Christchurch New Zealand
Myanmar Gonye (New Zealand)
Myanmar Action Group Denmark
Myanmar Catholic Community In Norway
Myanmar community in Italy
Myanmar Community in Norway
Myanmar Democratic Force in Denmark
Myanmar Engineers - New Zealand
Myanmar Global Support Foundation ( MGSF )
Myanmar Hindu Community - Norway
Myanmar Muslim Revolution Force
Myanmar Students’ Union in New Zealand
Nelson Myanmar Community New Zealand
New Zealand Doctors for NUG
New Zealand Zo Community Inc.
New Zealand Karen Association
NLD Organization Committee (International) Norway
No Business With Genocide
NOK Information & Scout Echo
North Dagon & East Dagon News
91  Norway Falam Community
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94  Overseas Mon Association. New Zealand
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96  Peace for Burma (Vancouver) Canada
97  Progressive Muslim Youth Association - PMYA
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99  Rangoon Scout Network
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102  Save Myanmar Fundraising Group (New Zealand)
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109  Tamwe Nway Oo Channel
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112  Tourism Committee
113  U.S. Campaign for Burma
114  Unitarian Universalist Service Committee
115  United States Chin Coalition (USCC)
116  Universities Kachin Literature and Culture Association - Yangon (Yangon JLH)
117  Volunteers in Myanmar
118  We support NUG-NB
119  Wellington Chin Community (New Zealand)
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121  Yangon Revolution Force - YRF (Soft Strike Community)
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126  Zomi Christian Fellowship of Norway
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130  ကွန်ပျတာတကသိုလ် ေကျာင်းသားများသမဂ
131  ချမ်းြမသာစည်မိနယ်လူထုသပိတ်စစ်ေကာင်း
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တိုက်ကွမ်ဒို အားကစားအသင်း

တိုင်းရင်းေဆးတကသိုလ် (မေလး) ေကျာင်းသားများသမဂ

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ေွဦးေတာ်လှန်ေရးဘာသာေပါင်းစံုကွန်ရက်

ပညာေရးမိသားစု (စစ်အာဏာှင်ဆန့်ကျင်ေရးပညာေရးစစ်ေကာင်းများ ချိတ်ဆက်ညိိင်းေရးေကာ်မတီ)

ြပည်ကီးတံခွန်သပိတ်

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ဘုရားကီး  ငိမ်းချမ်းေရးသပိတ်စစ်ေကာင်း

မေကွးလူထုတိုက်ပွဲေကာ်မတီ

Magway People's Revolution Committee

မလာတကသိုလ် ေကျာင်းသားများသပိတ်စစ်ေကာင်း

မလာတကသိုလ် ေကျာင်းသားများ သမဂ

မေလး ကဗျာဆရာများ  သမဂ (Mandalay Poets' Union)

မေလး ကုန်စည်ဒိုင်သပိတ်စစ်ေကာင်း

မေလး နည်းပညာတကသိုလ်  သမဂ

မေလး ိုင်ငံြခားဘာသာတကသိုလ်  သမဂ

မေလး ပုဂလိကတကသိုလ်  သမဂ (MPUSU)

မေလး မဟာမိတ် သပိတ်တပ်ေပါင်းစုစစ်ေကာင်း

မေလး လူငယ်  သပိတ်စစ်ေကာင်း

မေလး သပိတ်အင်အားစု

မေလး အင်ဂျင်နီယာ  တပ်ေပါင်းစု

မေလး အင်ဂျင်နီယာများ  အဖဲ (Mandalay Engineer Group)

မေလး အရပ်ဖက်  အဖဲအစည်းများ

ြမင်းြခံလူထုလပ်ှားမေကာ်မတီ

ြမေတာင်  သပိတ်စစ်ေကာင်း

ြမန်မီးရထား  တိုင်းအမှတ် (၃)CDM ဝန်ထမ်းများ  သပိတ်စစ်ေကာင်း

ြမန်မာသတင်းအချက်အလက်  နည်းပညာတကသိုလ် (မေလး)

မွတ်စ်လင်မ်လူငယ်များ  အဖဲ

မဟာေအာင်ေြမမိနယ်  စုပါလူထုသပိတ်စစ်ေကာင်း
176 အမြင် သို့သော် စကြာသင်ပါးအောင်မြင်ကြမည်
177 ဒိုရ္ဂါးလော်သန်နှင့် အဆောက်အဦး  (ရ.တ.သ.ဝ.)
178 အတက်ဒါရိုက်စီးပွားရေးဦးစီးချုပ် (အီးမီးဗီ-နယ်မြေ) | Alliance of Students' Unions Yangon (ASU-Yangon)
179 စီး (မော်သော်အိုင် ဗောဓုလောင်)
180 ကျွန်တော်မှာ တရားလေးနှင့်
181 နောက်ကြား (နယ်မြေ)
182 ဝယ်ယူပြောင်းပြည်
183 အရွယ်အစား စီးနှင့် ကျွန်တော် အပြောင်းအလဲများ အားလုံးကြည့်နေသည်:
184 အရွယ်အစားပြောင်းလည် နောက်ထပ်ကျွန်တော် အရာအရာများကိုလည်း ကျွန်တော်
185 အရွယ်အစားများကို ဒီဇိုင်းအားဖြင့် (နယ်မြေ)ကျွန်တော်အနွယ်များ အားလုံး
186 အရွယ်အစားများကို (နယ်မြေ)ကျွန်တော်အနွယ်များ
187 အရွယ်အစားပြောင်းလည် (နယ်မြေ)ကျွန်တော်အနွယ်များ
188 အရွယ်အစားများကို  (နယ်မြေ)ကျွန်တော်အနွယ်များ
189 အ.တ.ကြာ (၃) ကျွန်တော် ကျွန်တော်အဝေးသောကျွန်တော် အားလုံးတွင်:
190 အ.တ.ကြာ (၃) ကျွန်တော် ကျွန်တော်အဝေးသောကျွန်တော် အားလုံး (အ.တ.ကြာ)
191 အဖျင်စွာမှာ ကျွန်တော် အခြေခံကျွန်တော်:
192 အဖျင်စွာမှာ ကျွန်တော် (နယ်မြေ)
193 အဖျင်စွာမှာ ကျွန်တော်များကို နောက်ထပ်ကျွန်တော်(နယ်မြေ)ကျွန်တော်အနွယ်များ
194 အဖျင်စွာမှာ ကျွန်တော်
195 အဖျင်စွာမှာ ကျွန်တော်
196 အတွက် ကျွန်တော်များကို အပေါ် အဖျင်စွာမှာ: