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

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 Myanma 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 ၈၈ငြိမ်ချမ်းရေးနှင့်ပွင့်လင်းလူ့အဖွဲ့အစည်းထားဝယ်ခရိုင်

- 3 Ah Nah Podcast conversations with Myanmar
- 4 All Burma Democratic Face in New Zealand
- 5 Anti-Junta Mass Movement AJMM
- 6 Associations of United Nationalities in Japan
- 7 Auckland Kachin Community NZ
- 8 Auckland Zomi Community
- 9 Aung San Suu Kyi Park Norway
- 10 Basic Education Students & Youths Association (BESYA)
- 11 Boycott Military's Pocket
- 12 Burma Campaign UK
- 13 Burmese Community Group (Manawatu, NZ)
- 14 Burmese Rohingya Welfare Organisation New Zealand
- 15 Burmese American Community Institute 9BACI)
- 16 Burmese Canadian Network
- 17 Campaign for a New Myanmar
- 18 CDM Support Team Mandalay (CSTM)
- 19 Chin Community of Auckland
- 20 Chin Community in Norway
- 21 Citizen of Burma Award New Zealand
- 22 Citizens of Burma Award(Buffalo Chapter)
- 23 COBA UAE
- 24 CRPH and NUG Supporters Ireland
- 25 CRPH Funding Ireland
- 26 CRPH Support Group, Norway
- 27 CRPH Support Group, Norway and members organizations endorses
- 28 Democratic Party for a New Society, Norway
- 29 Democratic Youth Council ( ဒီမိုကရက်တစ်လူငယ်ကောင်စီ )
- 30 Doh Atu Ensemble pour le Myanmar
- 31 Dream Hope Goals Media Group
- 32 Dunedin Myanmar Community New Zealand
- 33 Enemy Air Route Channel
- 34 Federal Myanmar Benevolence Group (NZ)
- 35 Federal School
- 36 Federation of Workers' Union of the Burmese Citizen in Japan (FWUBC)
- 37 Free Rohingya Coalition
- 38 General Strike Committee of Nationalities (GSCN)
- 39 General Strike Coordination Body GSCB
- 40 Global Myanmar Spring Revolution (GMSR)
- 41 Hero Behind Bars
- 42 HTY Scout Channel
- 43 Human Right Defenders and Promoters(Palaw)
- 44 Information & Scout News (Hlaing)
- 45 Insein Scout Channel
- 46 Integria, z.s.

- 47 International Association, Myanmar-Switzerland (IAMS)
- 48 International Campaign for the Rohingya
- 49 Japan Myanmar Help Network JMHN (comprising of over 40 youth groups in Japan)
- 50 Justice For Myanmar
- 51 K'cho Ethnic Association
- 52 Kachin Association Norway
- 53 Kachin State Civilian Movement- KSCM
- 54 Kamayut Scout Channel
- 55 Kanbauk Defense Force (KBDF)
- 56 Karenni Society New Zealand
- 57 Karenni Association Norway
- 58 Karenni Wellington Community
- 59 Kyauktada Strike Committee
- 60 Kyimyindaing Scout Channel
- 61 La Communauté Birmane de France
- 62 LA2M
- 63 Lanmadaw, Latha & Pabedan Scout Channel
- 64 League for Democracy in Burma( Japan )
- 65 Legal Aid for Human Rights (Southern Shan State)
- 66 LGBTIQ (လိင်စိတ်ခံယူမှုကွဲပြားသူများ) သပိတ်စစ်ကြောင်း
- 67 Mayangone News
- 68 MIIT ကျောင်းသားကျောင်းသူများ သပိတ်စစ်ကြောင်း
- 69 Minority Affairs Institute (MAI Myanmar)
- 70 Muslim Youth Network
- 71 Myanmar Community Christchurch New Zealand
- 72 Myanmar Gonye (New Zealand)
- 73 Myanmar Action Group Denmark
- 74 Myanmar Catholic Community In Norway
- 75 Myanmar community in Italy
- 76 Myanmar Community in Norway
- 77 Myanmar Democratic Force in Denmark
- 78 Myanmar Engineers New Zealand
- 79 Myanmar Global Support Foundation (MGSF)
- 80 Myanmar Hindu Community Norway
- 81 Myanmar Muslim Revolution Force
- 82 Myanmar Students' Union in New Zealand
- 83 Nelson Myanmar Community New Zealand
- 84 New Zealand Doctors for NUG
- 85 New Zealand Zo Community Inc.
- 86 New Zealand Karen Association
- 87 NLD Organization Committee (International) Norway
- 88 No Business With Genocide
- 89 NOK Information & Scout Echo
- 90 North Dagon & East Dagon News

- 91 Norway Falam Community
- 92 Norway Matu Community
- 93 Norway Rywang Community
- 94 Overseas Mon Association. New Zealand
- 95 PDF Support (Vancouver - Canada)
- 96 Peace for Burma (Vancouver) Canada
- 97 Progressive Muslim Youth Association-PMYA
- 98 **Progressive Voice**
- 99 Rangoon Scout Network
- 100 Rohingya Community in Norway
- 101 Rywang Community Association New Zealand
- 102 Save Myanmar Fundraising Group (New Zealand)
- 103 Save Myanmar Israel
- 104 Shan Community (New Zealand)
- 105 Sitt Nyein Pann Foundation
- 106 South Dagon Scouting Infos (SDG)
- 107 Southern Dragon Myanmar
- 108 Support group for Democracy in Myanmar (the Netherland)
- 109 Tamwe Nway Oo Channel
- 110 Tenasserim Students Unions Network - TSUN
- 111 Thaketa & Dawbon Scout Channel
- 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 )
- 120 Wellington Myanmar community
- 121 Yangon Revolution Force - YRF (Soft Strike Community)
- 122 Youth for Democratization of Myanmar (UDM)
- 123 Youth Scout For Democracy (YSD)
- 124 YWTC(yangon)
- 125 **Z Fighter News**
- 126 Zomi Christian Fellowship of Norway
- Zomi Community Norway 127
- ကျန်းမာရေးမိသားစု မန္တလေး (Medical Family Mandalay) 128
- ကွန်ပျူတာတက္ကသိုလ်(မန္တလေး)ကျောင်းသားများသမဂ္ဂ ချမ်းမြသာစည်မြို့နယ် လူထုသပိတ်စစ်ကြောင်း စိန်ပန်း သပိတ်စစ်ကြောင်း 129
- 130
- 131
- ဆေးတက္ကသိုလ်(မန္တလေး)ကျောင်းသားများသမဂ္ဂ 132
- ဆေးဘက်ဆိုင်ရာနည်းပညာတက္ကသိုလ်(မန္တလေး)ကျောင်းသားများ သမဂ္ဂ 133
- ဆေးဝါးတက္က်သိုလ်(မန္တလေး)ကျောင်းသားများသမဂ္ဂ 134

```
တမ္ပဝတီ လူထုသပိတ်စစ်ကြောင်း
တိုက်ကွမ်ဒို အားကစားအသင်း
135
136
          တိုင်းရင်းဆေးတက္ကသိုလ်(မန္တလေး)ကျောင်းသားများသမဂ္ဂ
137
          တိုင်းရင်းသားလူငယ်များ အထွေထွေသပိတ်ကော်မတီ
138
         တောင်သာလူထုလှုပ်ရှားမှုကော်မတီ
ဒေါင်းစစ်သည်
139
140
          နည်းပညာတက္ကသိုလ်(မန္တလေး)ကျောင်းသားများသမဂ္ဂ
နည်းပညာတက္ကသိုလ်(ရတနာပုံဆိုင်ဘာစီးတီး)ကျောင်းသားများ သမဂ္ဂ
141
142
          နွေဦးတော်လှန်ရေးဘာသာပေါင်းစုံကွန်ရက်
143
          နားထောင်ရင်းလှူပေးပါ။
144
145 ပညာရေးမိသားစု
ချိတ်ဆက်ညှိနှိုင်းရေးကော်မတီ)
                                               (စစ်အာဏာရှင်ဆန့်ကျင်ရေး
                                                                                      ပညာရေးစစ်ကြောင်းများ
         ပြည်ကြီးတံခွန်သပိတ်
ပုဂ္ဂလိက မူကြိုဆရာ၊ ဆရာမများအဖွဲ့
ဘာသာပေါင်းစုံ သပိတ်စစ်ကြောင်း
ဘုရားကြီး ငြိမ်းချမ်းရေးသပိတ်စစ်ကြောင်း
မကွေးလူထုတိုက်ပွဲကော်မတီ / Magway People's Revolution Committee
မန္တလာတက္ကသိုလ် ကျောင်းသားကျောင်းသူများသပိတ်စစ်ကြောင်း
147
148
149
150
151
          မန္တိလာတက္က်သိုလ်ကျောင်းသားများသမဂ္ဂ
152
          မန္တလေး က်ဗျာဆရာများသမဂ္ဂ (Mandalay Poets' Union)
မန္တလေး ကုန်စည်ဒိုင်သပိတ်စစ်ကြောင်း
153
154
          မန္တလေး၊ တက္ကသိုလ် ဒီဂရီ၊ ကောလိပ် ဆရာ၊ ဆရာမများ၊ ဝန်ထမ်းများ သပိတ်စစ်ကြောင်း
155
          မန္တလေးကွန်ပျူတာတက္ကသိုလ်ကျောင်းသားများသမဂ္ဂ
156
          မန္တလေးတိုက္ကသိုလ် ကျောင်းသား ကျောင်းသူဟောင်းများ သပိတ်စစ်ကြောင်း
မန္တလေးတိုင်းဒေသကြီးလွှတ်တော် ကိုယ်စားပြုကော်မတီ (Committee
157
158
                                                                                          (Committee
                                                                                                               Representing
Mandalay Region Hluttaw)
          မန္တလေးနည်းပညာတက္ကသိုလ်ကျောင်းသားများသမဂ္ဂ
         မန္တလေးနိုင်ငံခြားဘာသာတက္ကသိုလ်ကျောင်းသားများသမဂ္ဂ
မန္တလေးနိုင်ငံခြားဘာသာတက္ကသိုလ်ကျောင်းသားများသမဂ္ဂ
မန္တလေးပုဂ္ဂလိကတက္ကသိုလ် ကျောင်းသားများသမဂ္ဂ (MPUSU)
မန္တလေးမြို့အခြေစိုက် လူထုသပိတ်စစ်ကြောင်း
မန္တလေးမဟာမိတ် သပိတ်တပ်ပေါင်းစုစစ်ကြောင်း
160
161
162
163
          မန္တလေးလူငွယ့် သပိတ်စစ်ကြောင်း
164
          မန္တလေးသပိတ်အင်အားစု
165
          မန္တလေးအင့်ဂျင့်နီယာ တပ်ပေါင်းစု
166
         မန္တလေးအင်ဂျိင်နီယာများအဖွဲ့ (Mandalay Engineer Group)
မန္တလေးအရပ်ဖက်အဖွဲ့အစည်းများ
167
168
          မြင်းခြံလူထုလှုပ်ရှားမှုကော်မတီ
မြတောင် သပိတ်စစ်ကြောင်း
169
170
          မြန်မာနိုင်ငံဘဏ်အလုပ်သမားသမဂ္ဂများအဖွဲ့ချုပ် (Bank Trade Unions Federation of
171
Myanmar – BTUFM)
          မြန်မာ့မီးရထား တိုင်းအမှတ် (၃) CDM ဝန်ထမ်းများ သပိတ်စစ်ကြောင်း
မြန်မာ့သတ္တင်းအချက်အလက်နည်းပညာတက္ကသိုလ်(မန္တလေး) ကျောင်းသားများသမဂ္ဂ
172
173
          မွတ်စ်လင်မ့်လူငယ်များအဖွဲ့
174
          မိဟာအောင်မြေမြို့နယ် စုပေါင်းလူထုသပိတ်စစ်ကြောင်း
175
```

```
မေမြို့ ပင်မအထွေထွေသပိတ်အင်အားစု
ရတနာပုံတက္ကသိုလ်ကျောင်းသားများသမဂ္ဂ (ရ.တ.က.သ)
ရန်ကုန်အခြေစိုက်တက္ကသိုလ်ကျောင်းသားသမဂ္ဂများ (တကသများ-ရန်ကုန်) | Alliance of
176
177
178
Students' Unions Yangon (ASU-Yangon)
         ရေဘဝဲ (ပြည်သူ့အကျိုးပြု လူငယ်အဖွဲ့အစည်း)
179
         လှူငယ်ကဗျာဆရာများသမဂ္ဂ
180
181
         သံဃသမဂ္ဂ (မန္တလေး)
         သပြေညို သတင်းလွှာ
182
         သမဝါယမတက္ကသိုလ် ကျောင်းသူ၊ ကျောင်းသားများ သပိတ်စစ်ကြောင်း
သရက်ချောင်းမြို့နယ် ပြည်သူကာကွယ်ရေးပြောက်ကျားတပ်ဖွဲ့
သွားဘက်ဆိုင်ရာဆေးတက္ကသိုလ်(မန္တလေး)ကျောင်းသားများ သမဂ္ဂ
183
184
185
         သားဖွားသင်တန်းကျောင်း(မန္တလေး)ကျောင်းသားများသမဂ္ဂ
သူနာပြုတက္ကသိုလ်(မန္တလေး)ကျောင်းသားများသမဂ္ဂ
186
187
         သူနာပြုသင်တန်းကျောင်း(မန္တလေး)ကျောင်းသားများသမဂ္ဂ
188
189
         အ်.ထ.က (၇) ကျောင်းသူ၊ ကျောင်းသားဟောင်းများ သပိတ်စစ်ကြောင်း
         အ.လ.က (၁၂) ထဲခွဲ၊ အခြေခံပညာကျောင်းသားများသမဂ္ဂ (အ.က.သ)
အဖမ်းဆီးခံပြည်သူများ ကိုယ်စားပြုသပိတွ်စစ်ကြောင်း
190
191
         အမျိုးသားဒီမိုကရေစီအဖွဲ့ချုပ် (မန္တလေးတိုင်း)
192
         အမျိုးသားယဉ်ကျေးမှုနှင့် အီနုပညာတက္ကသိုလ်(မန္တလေး)ကျောင်းသားများသမဂ္ဂ
193
         အလုပ်သမားသမဂ္ဂများအဖွဲ့ချုပ်
အောင်ပင့်လယ် ပင်မသပိတ်စစ်ကြောင်း
194
195
```

အောင်မြေသာစံ ပညာရေးကျောင်းပေါင်းစုံ သပိတ်စစ်ကြောင်း

196