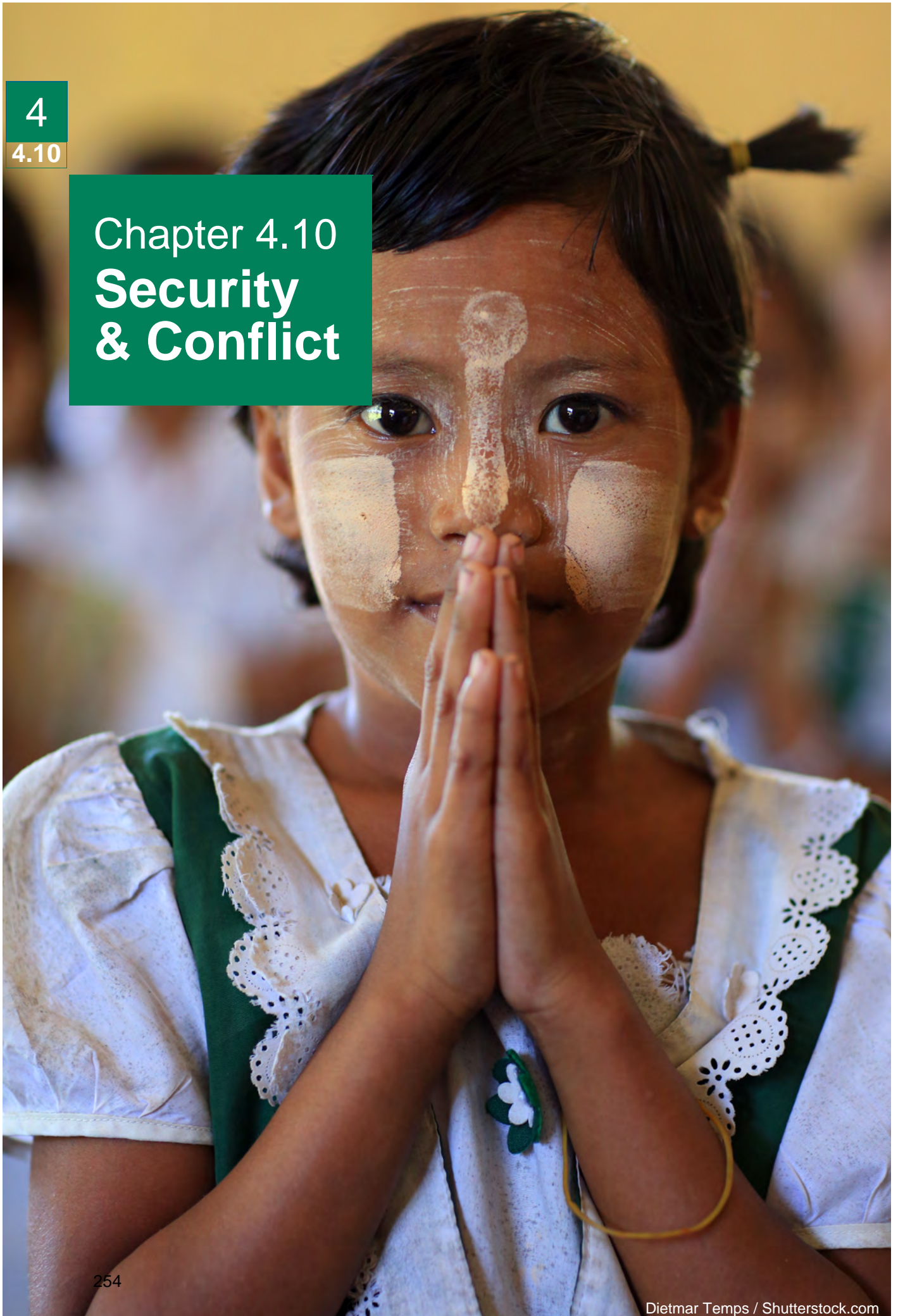


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4.10

Chapter 4.10 Security & Conflict



Chapter 4.10

Security & Conflict

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A. Context

The race to roll out

Myanmar will probably have the fastest take-up of mobile communications in history. There is currently a race taking place to roll out the telecommunications network and secure customers among the Myanmar people, many of whom will be subscribing for the first time. Tower site hunters are continuing to actively search for sites, with an estimate of 250 towers being rolled out per month. Operators have improved coverage significantly in central and lower Myanmar, but are now beginning construction and roll out in areas such as Kachin State and Northern Shan State, with areas including Chin State and Rakhine State slated for rollout in late 2015. Operators are working to ensure that geographic targets set by the Ministry of Communication and Information Technology (MCIT) are met, including providing voice services to 75% of the country and data services for 50% of the country in 60 months⁶³⁶. This prompts companies to maximise population coverage within the confines of the geographic limits. Such dynamics may push companies to consider roll out to areas that still have active armed conflicts, as they will have dwindling options to choose 'safe' (i.e. non-conflict) areas. Other parts of the ICT value chain are increasingly operating in all parts of the country as well.

The Myanmar Government, particularly the *tatmadaw* (army), is still viewed by many ethnic minority populations with deep suspicion as a violent and predatory force. Business, especially the extractives sector, have similarly been viewed as predatory, and

⁶³⁶ Myanmar Ministry of Communications and Information Technology (MCIT), "[End of the Expression of Interest stage regarding the tender for two Nationwide Telecommunications Licences in the Republic of the Union of Myanmar](#)" (21 November 2013).

there is a risk that the ICT sector could be caught up by the broader suspicions of business. Ethnic minority armed group leaders might worry that ICT will be a very well-received service, seen as being delivered or facilitated by the Government, thereby undermining their agendas and support from their communities. In other words, the telecommunications roll out may become associated with state penetration into former insurgent areas. In addition, ICTs bring ‘modernisation’ and the market economy which will impact on traditional cultures and livelihoods patterns. On the other hand, ICT will be seen, at least by some, as contributing to the ‘peace dividend’, including by providing jobs and potentially supporting ethnic languages and cultures. ICT may promote the mobility that was so long denied, for example by helping migrant workers minority groups maintain links with home. The rollout of services in ethnic areas will help ensure that a ‘digital divide’ is not created that could further reinforce inequality in these areas.

Armed Conflict in Myanmar

Myanmar is very ethnically diverse. However, due to complexities and nuances in terms of language, culture and self-identification, it is difficult to identify a definitive list of ethnic minorities. The current figure of 135 “*national races*” used by the Government is contested by many ethnic minority leaders who highlight its weak anthropological underpinning and believe it is an attempt to overstate the complexities for political ends. See [Chapter 4.8](#) on Groups at Risk (specifically the sections on ethnic minorities and on the latest census).

Much of Myanmar’s border areas where many of the ethnic minorities live, have been mired in non-international armed conflict for decades, and it has become a way of life for many armed groups. In the process lives, livelihoods, economies and the environment have been severely affected and sometimes destroyed (see also [Chapter 4.8](#)). Ethnic minority armed groups began fighting against the central Government shortly after independence in 1948. The *Tatmadaw* in turn launched counter-insurgency offenses. Ethnic minority armed groups operate in all seven States – Kayin, Kayah, Shan, Mon, Chin, Kachin, and Rakhine States and parts of Tanintharyi Region. Ceasefires between the Government and several armed groups began to be agreed in 1989 but were essentially only security agreements, with ‘ceasefire groups’ allowed to retain their arms and to control some territory. This resulted in a freeze, rather than a halt, to some of the conflicts. However fighting continued in parts of the Kayin, Kayah, and Shan States in the east of the country as armed groups there continued in their armed struggle for greater autonomy from the central Government.

In its decades-long counter-insurgency campaigns against various ethnic minority armed opposition groups, the *Tatmadaw* has committed a wide range of violations of international human rights and humanitarian law. As troops entered ethnic minority villages, they seized foodstuffs, destroyed villages, used civilians for forced labour, particularly portering, killed and tortured civilians, and forcibly displaced them. Armed ethnic minority opposition groups have also committed abuses, although to a lesser degree.⁶³⁷ Ethnic grievances have centred on these abuses; the lack of self-governance and resource sharing with the central Government; discrimination and marginalisation; religious freedom; and lack of education in ethnic minority languages.

⁶³⁷ For a full discussion of the human rights situation in the counter-insurgency context, see reports from Amnesty International from 1988 – 2008, and Human Rights Watch.

Conflict has greatly inhibited economic development in the ethnic border areas, and poverty rates in these areas are high. For example 73% of the population in Chin State lives below the poverty line, 44% in Rakhine State (though the World Bank's reinterpretation of the data suggests a rate of 77.9%) and 33% in Shan State; the national poverty rate is 26% (the World Bank's reinterpretation of the data reveals a 37.5% rate).⁶³⁸

Ongoing Conflicts

In June 2011 a 17-year ceasefire between major armed group, the Kachin Independence Organisation (KIO), and the Government broke down. Fighting continues in Kachin and Northern Shan States between the two groups, with some 100,000 people displaced.⁶³⁹ Other armed groups there are also fighting against the *tatmadaw*, including the Ta-ang (Palaung) National Liberation Army, which is allied to the KIO. In February 2015 the Myanmar National Democratic Alliance Army, an ethnic Kokang (Han Chinese) armed group, launched an offensive against the *tatmadaw* in northern Shan State, where fighting is ongoing. 30,000 Kokang civilians fled to China; others were displaced internally. The President declared a state of emergency and martial law the same month, granting wide powers to the *tatmadaw* in the conflict area.⁶⁴⁰ Since the resumption of fighting in 2011, some 200,000 people have been displaced in Kachin and northern Shan States.⁶⁴¹

All of these conflicts have delayed and complicated the nationwide peace process. Moreover, both international and Myanmar NGOs have reported violations of international human rights and humanitarian law, including forced displacement and labour; torture; and arbitrary arrests by the *tatmadaw* of ethnic minority civilians in the context of the KIO/TNLA – *tatmadaw* conflict.⁶⁴²

Post-Conflict Areas and the Peace Process

From late 2011 the Thein Sein Government started a new peace initiative, engaging in talks with almost all groups and agreeing written documents. A total of 14 individual ceasefire agreements have been signed, with active talks on a nationwide ceasefire agreement ongoing between the Government and armed groups. As a result, fighting has been reduced in Kayah, Kayah, and eastern Shan States as armed groups in those areas have agreed ceasefires with the Government. On 31 March 2015 the Government and armed groups agreed on a draft text for a Nationwide Ceasefire Accord (NCA); in May armed groups met among themselves for further discussions on the draft NCA. Formal signing of the agreement has yet to take place, with both sides needing to reach a consensus inter alia on which groups are eligible to sign the document.⁶⁴³ While these are historic developments, much work remains to take the next step of determining the highly political and complex questions around the Government's structure and division of power and the shape of the future armed forces. With the November 2015 elections approaching and a new Government taking power in March 2016, both the Government and armed ethnic minority groups are aware that time is running out for the National Ceasefire Agreement.

⁶³⁸ ADB, "[Interim Country Partnership Strategy: Myanmar 2012 – 2014, Poverty Analysis \(Summary\)](#)" (2012).

⁶³⁹ UN HCR, "[2015 UNHCR country operations profile - Myanmar](#)" (last accessed September 2015).

⁶⁴⁰ International Crisis Group, "[Crisis Alert: Deteriorating situation in Myanmar](#)" (2 March 2015).

⁶⁴¹ Transnational Institute in The Nation, "[Consequences of the Kokang crisis for peace, democracy in Myanmar](#)" (29 July 2015).

⁶⁴² See for example Human Rights Watch, "[Untold Miseries: Wartime Abuses and Forced Displacement in Kachin State](#)" (March 2012).

⁶⁴³ International Crisis Group, "[Myanmar](#)" (1 April 2015).

Although fighting continues in Kachin and northern Shan States, ceasefires in other ethnic minority areas are mostly holding as a post-conflict landscape emerges. Fighting has largely ceased in Kayin, Kayah, and Chin States, and the 1995 ceasefire between the New Mon State Party and the Government remains intact in Mon State. However there are legacy issues emerging, such as landmines planted by most parties to the conflicts, including non-state armed groups. The Government is not yet a state party to the Mine Ban Treaty, although in 2012 it stated an interest in acceding to it.⁶⁴⁴ A major mine clearance operation in many parts of the border areas has yet to begin.

Ethnic minority ceasefire areas are rich in natural resources, including hydropower, hardwoods, and minerals. Ceasefires have made land more available to commercial interests, some of which are linked to the central Government and the military. Ethnic minority ceasefire groups also have business interests in their territories. At the same time these areas are highly militarised, including Myanmar troops and allied militias, ethnic minority armed groups, and armed criminal elements.

The nationwide ceasefire process will not necessarily bring an end to insecurity in Myanmar's border areas. In addition to the major armed groups at the peace table, there are numerous small splinter groups, village militias (some with hundreds of troops), and armed criminal gangs. Lack of economic opportunities, an easy availability of weapons, and weak security and rule of law mean that these areas will be characterised by insecurity for some time to come. If the peace process eventually leads to disarmament, demobilisation, rehabilitation and reintegration – which is still likely some years off – there will be the additional dynamic of former combatants with limited opportunities for lawful employment, who may resort to extortion, racketeering and other criminal activities to support themselves, as indeed some are already doing.

Intercommunal Violence

There has been a long history of inter-communal violence in Myanmar, dating back to colonial times. In 1977 and again in 1991 there were major exoduses of Rohingya Muslims⁶⁴⁵ from northern parts of Rakhine state into Bangladesh, as a result of intercommunal clashes and abuses by state security forces. Most of the 250,000 who fled were subsequently repatriated under UN auspices, but there were no real efforts at re-integration, and the majority have no citizenship papers and were registered as “*foreign residents*” (white card holders) with fewer rights. These white cards were also withdrawn in 2015, leaving them without papers. Moreover, Rohingyas did not appear on voter lists displayed in Rakhine State during June 2015, leaving them effectively disenfranchised and unable to vote in the 2015 elections.

For over 20 years credible international organisations have reported on human rights violations against the Rohingya, including forced labour, forcible displacement, restrictions on marriage and freedom of movement, as well as the more recent violence against them.⁶⁴⁶ Moreover successive UN Special Rapporteurs on the situation of human rights in Myanmar have expressed concerns about such violations against the Rohingya.⁶⁴⁷

⁶⁴⁴ Landmine and Cluster Munitions Monitor, “[Myanmar/Burma](#)” (November 2014).

⁶⁴⁵ The Myanmar Government refuses to accept the term ‘Rohingya’ and refers to the population as ‘Bengali’.

⁶⁴⁶ See for example Amnesty International, “[Myanmar: The Rohingya Minority: Fundamental Rights Denied](#)”, Index number ASA 16/005/204 (May 2004). Human Rights Watch, “[All you can do is pray: Crimes Against](#)

A new round of deadly violence erupted across much of the state in 2012. This has mainly been anti-Muslim violence by Buddhist mobs, although in northern Rakhine State where the Muslim population is a large majority, there has also been Muslim-on-Buddhist violence. (See also [Chapter 4.8](#) Groups at Risk). However, the most recent manifestation has been among the most intense and sustained and is partly linked to the new political realities and the competition for political power in Rakhine State. Under the military regime, the Rakhine minority was seen as a threat and systematically side-lined, and so there was effectively no political power to compete for.

Currently, there are almost 140,000 internally displaced persons in Rakhine State, many living in very poor conditions; the large majority are in Sittwe Township. Other Muslim populations have lost, or are at risk of losing, their livelihoods, compounded by longstanding restrictions on movement that prevent them travelling in search of work. Access to these populations for humanitarian organisations is a major challenge, with local Rakhine communities accusing them of pro-Muslim bias, and often intimidating humanitarian workers and blocking access to Muslim communities.

Other Security Issues

On a more general basis, to date there have been few reports of security issues around ICT infrastructure. Based on experience in other countries, once the presence of bunkers of fuels around tower base stations becomes more widely known, there could be increased incidence of theft, leading to the need for more stringent security measures or guarding of tower facilities.

B. Field Research Findings

Land
Human Rights Implicated: Right to life, liberty and security of the person; Right to take part in the conduct of public affairs; Right to information
<p>Field Assessment Findings</p> <ul style="list-style-type: none"> ▪ There were some cases in which companies attempted to negotiate access to areas to lay fibre cables with non-state armed groups (NSAGs). In some cases a fee was paid for this access. ▪ Researchers received reports of cases of operational delays, where local groups, including armed groups, blocked access to sites, due to lack of consultation at the site level. While some consultation with local leaders may have been undertaken, this may not have been communicated to or accepted by all.

Labour
Human Rights Implicated: Right to life, liberty and security of the person; Right to just and favourable conditions of work
<p>Field Assessment Findings</p>

[Humanity and Ethnic Cleansing of Rohingya Muslims in Burma's Arakan State](#)" (April 2013) and International Crisis Group, ["The Dark Side of Transition: Violence Against Muslims in Myanmar"](#) (Oct. 2013).

⁶⁴⁷ Office of the High Commissioner for Human Rights, ["UN rights expert calls on Myanmar to address worrying signs of backtracking in pivotal year"](#) (18 March 2015).

- Researchers observed **fire-arms being carried by NSAGs** present during roll-out in ceasefire areas. While researchers neither observed nor heard reports of shots being fired, the presence of fire-arms presents a security and safety risk.
- Researchers also received reports from workers that they were aware that in the past **landmines may have been sown around infrastructure in conflict areas**. This led workers to avoid walking through certain areas. The measures companies took to protect their workers in such circumstances were unclear.

C. Security & Conflict: Recommendations for ICT Companies

Interactions with Myanmar Military

- **Undertake enhanced due diligence regarding company interactions with the Myanmar military:** Due to the legacy of armed conflict in certain areas, and clashes still occurring in some areas, ICT companies will have to be particularly aware of the risks of human rights violations being committed by the Myanmar military near their areas of operations. Neither the field research nor other reports have indicated that the Myanmar military is providing security in connection with infrastructure rollout. However, the *tatmadaw* has played a role in security strategic assets like oil and gas pipelines in the country. The military has a long history of human rights violations in ethnic minority areas including forced labour and torture of civilians by troops, illegal taxation, and land confiscation.
- **Where military involvement is unavoidable, use international standards such as the [Voluntary Principles on Security and Human Rights](#) (the VPs).** If it is unavoidable to work with the Myanmar military provide security for network infrastructure construction or operations, operators should identify safeguards that could be put in place with them to prevent human rights abuses in connection with any of their operations. The VPs are an international initiative on security forces and human rights developed for the extractives sector but applicable more widely. They provide useful guidance for incorporating human rights into arrangements with public and private security providers (see below, Security Providers). Companies, rather than countries, can take the initiative to apply the VPs to their operations. Myanmar therefore does not need to ‘join’ the VPs before the standards can be adopted in-country. However since doing so requires cooperation with security forces, to be effective, the Government should understand and support the VPs and their application. Some oil and gas companies are considering advocacy to the Government to support of the VPs⁶⁴⁸.
- **Be aware of the potential for surveillance and address consumer fears:** ICT companies that operate within those parts of the ICT value chain which may be subject to surveillance requests from the Government should understand the historical context of surveillance in Myanmar, in particular in areas of armed conflict and its often severe consequences. Currently there is a lack of appropriate legal safeguards on surveillance (see [Chapter 4.4](#) on Surveillance). There may therefore be justifiable sensitivity among the population and civil society organisations to the possibility of continued surveillance, particularly in ethnic minority regions. There is a possibility for misunderstandings and tension if ICT companies are seen to be facilitating (and spreading) Government surveillance.

⁶⁴⁸ See MCRB, “[Myanmar Oil & Gas Sector Wide Impact Assessment](#)” (2014), pg. 151-152.

Security Risks

- **Assess the risk of land mines:** Land mines were previously planted around Myanmar's infrastructure as (reportedly) a means of preventing sabotage by local armed groups. In addition, large swathes of the border areas are still seeded with landmines and other explosive remnants of war. There are no accurate maps of such areas seeded and in the parts of the country where conflicts are still active, new land mines are being planted. There has been no systematic de-mining in Myanmar. Ethnic armed groups generally know where land mines are in their areas of control. ICT companies will need to assess the risk of land mines being present near tower sites they are building or upgrading, as well as areas for fibre lines. Companies should avoid these areas to protect the safety of their staff and contractor staff.
- **Security risks for Muslim staff:** There exist potential security risks to Muslim staff, or staff of a company believed to be Muslim where local communities hold anti-Muslim sentiments.
- **Security risks for expatriate staff:** There exist potential security risks to expatriate ICT company staff in Rakhine State given recent protests directed at international aid workers
- **Exposure to criminal gangs:** Companies operating in conflict areas may become targets for bandit attacks, or extortion by armed groups or criminal gangs seeking to control access to areas or extort money to "*protect*" workers or facilities.

Engagement in Conflict Affected Areas

- **Consulting with non-state armed groups (NSAGs):** There are particular challenges in conducting effective consultations in conflict-affected areas. Many ethnic minority border areas have never historically come under the administrative control of the central state. Companies should build an understanding the history and dynamics of the conflict and the key stakeholders that need to be consulted, through a conflict mapping and stakeholder analysis. In areas where non-state armed groups (NSAGs) operate, it is critical to engage with them and the ethnic minority civil society groups operating in their areas. Most of these groups have bilateral ceasefire agreements with the Government that in principle authorise them to travel freely within the country (without arms) and meet with whomever they wish. They are, however, technically illegal (see Chapter 2 on the Unlawful Associations Act). It is important to recognise that some of these groups have areas of political influence and authority that are far wider than the limited territory over which they have military control. The larger NSAGs run parallel administrations, from health and education through to land registration, forestry and revenue collection. As the de facto authority in their areas, their agreement is necessary for any activities to take place. Companies should be aware of whom they are consulting with (or who those acting on their behalf are consulting with), and understand the risks of not consulting with NSAGs (but see below). It will also be important for companies engaging local contractors to understand the relationship between sub-contractors and NSAGs.
- **Consulting with communities in conflict areas:** Companies should not assume that the NSAG is representative of the views of all communities; in some cases relations may be coercive; in some cases the NSAG may be dominated by one ethnic minority and not others in the area. Companies should identify others who are representative of different constituencies, including those whose voices may not always be heard, such as women's groups or marginalised communities; as well as the main power holders (who may not always be representative). In some cases – for example, meetings with leaders of NSAGs – contacts may have to be established

through a trusted third party, who can provide a channel of communication and/or convene meetings. Experienced third party facilitators will need to be engaged to ensure that effective community consultations can take place in an atmosphere where people will be safe and confident to speak freely, something that the presence of either Government or NSAG representatives might hamper. In conflict contexts in particular, consultations with key stakeholders should be seen as a relationship-building exercise more than an information-collection exercise; if handled poorly the consultation process could put communities at risk; if handled well, the sector could provide new models for business in post-conflict areas.

- **Consultations in inter-communal conflict areas:** In areas where there are inter-communal tensions and violence, such as parts of Rakhine State, similar challenges exist. Consultations themselves could present a risk of increasing tensions or prompt violence if Rakhine communities object to consultation with Muslim communities, or object to the provision of services to other communities due to their concerns that this may give legitimacy to that community and its viewpoints. Such situations need to be handled with great delicacy, and require a detailed understanding of local dynamics; local authorities are often not neutral.
- **Understand the debate on benefits sharing:** Many of Myanmar's ethnic minority areas are resource rich with considerable economic potential, but have been exploited for the benefit of the local elite, or Naypyidaw, while the community has experienced only the negative impacts. The expectation is that discussion on this will take place as part of the post-ceasefire political dialogue. This has classically been an extractives sector issue, but given the positive benefits of access to modern telecommunications, there is a risk that ICT companies will experience similar tensions if ICTs are not rolled out to local ethnic minority populations. Universal access is thus an important objective for collective action by the sector, civil society and the Government.

Land Considerations

- **Undertake additional due diligence on land in conflict affected areas:** In conflict-affected areas, acquiring land use permits by ICT companies has added complexities. Many of these areas are not included in the national cadastre, or are considered Vacant, Fallow or Virgin lands by default. Some NSAG administrations have their own systems of land registration, including recognition of communal rights, customary rights, and shifting cultivation. Weaknesses in these systems, corruption and lack of transparency mean that local populations are not always consulted on decisions, including the granting of land use rights for private sector operations. In any due diligence, companies should consult closely with the affected communities. In some areas of contested authority, communities may not be aware that such rights have been granted, or by whom. Local armed group commanders may give authorisations without the knowledge of their headquarters.⁶⁴⁹ The widespread planting of anti-personnel land mines in much of the border areas has restricted the use of this land by communities and other potential land users. The fact that the land has not been used by rights holders for long periods due to land mines increases the chances of dispossession of these original rights holders. Land will be particularly susceptible to land grabbing if future demining programs render it safe to use.
- **Additional land due diligence in areas of inter-communal violence:** In areas of inter-communal tension, such as Rakhine State where almost 140,000 people remain

⁶⁴⁹ See Karen Human Rights Group, "[Losing Ground: Land conflicts and collective action in eastern Myanmar](#)" (March 2013) and TNI, "[Financing dispossession](#)" (Feb. 2012).

displaced by inter-communal violence, ICT companies will need to carry out particularly careful due diligence on the provenance of any land they seek to use. They should first establish whether there is a connection to persons displaced by inter-communal violence. Since displaced populations should be entitled to return to their homes, it is important for companies to avoid contributing to the problem, or appear to give tacit support to, or benefit from, the activities which have resulted in the displacement. Companies should obtain advice from local experts including relief agencies and CSOs operating in the area before deciding how to proceed.

Company Employed & Contracted Security Providers

- **Security Providers:** Some companies in the ICT value chain will require security guards for their towers and generators (where there are some reports of fuel and equipment theft), data centres or office buildings. It is important to ensure that contracted security providers (whether contracted directly or through a service) have had background checks to ensure security service owners, managers or guards have not been linked to past human rights abuses. They also need appropriate training on respecting human rights. Companies should ensure that working conditions and employment contracts, in line with international labour rights standards, are integral parts of the contract with the security provider, as security providers are often very poorly paid in Myanmar. Companies should consider prioritising members of local communities for security jobs, but bear in mind where this may exacerbate inter-communal tensions, depending on the choices made. As noted above, the [Voluntary Principles on Security and Human Rights](#) provide relevant guidance, despite being developed for the extractives sector. In addition, if the ICT companies find that they need active protection from private security guards, there is now an [International Code of Conduct for Private Security Providers](#)⁶⁵⁰ that sets private security industry principles and standards based on international human rights law. The code is open to signature by companies providing security services and will soon put in place a certification system that will help to ensure company compliance with the code, providing additional assurance that service providers are trained in international human rights law principles.⁶⁵¹ This is a relevant reference for screening potential service providers and should serve as a goal for company commitment within a specified time period.⁶⁵²
- **Use of weapons:** Private security guards are unarmed in Myanmar, which lowers the level of risks to human rights posed by private security providers but does not eliminate all risks. Appropriate training in human rights will still be needed.⁶⁵³ However in ethnic minority areas, guards may be armed, which heightens risks and requires more immediate training on the appropriate use of force and in human rights.

⁶⁵⁰ International Code of Conduct Association, "[International Code of Conduct for Private Security Providers](#)" (2010).

⁶⁵¹ Ibid. See also, MCRB, "[Myanmar Oil & Gas Sector Wide Impact Assessment](#)" (2014), Chapter 4.7.

⁶⁵² See: Myanmar Times, "[The rise of private security](#)" (5 January 2015).

⁶⁵³ For further guidance, see Voluntary Principles on Security and Human Rights, "[Implementation Guidance Tools](#)" (2011).

D. Relevant International Standards and Guidance on Security and Conflict

Relevant International Standards:

- [The Voluntary Principles on Security and Human Rights](#) is an initiative that includes governments, companies in the extractives sector, and NGOs. The Principles are designed to guide companies in maintaining the safety and security of their operations within an operating framework that encourages respect for human rights and which addresses working with public and private security providers.
- [International Code of Conduct for Private Security Providers](#)

Guidance:

- The IFC/World Bank Group Environmental, Health, and Safety Guidelines for Telecommunications provide guidance on siting infrastructure and other aspects of community safety.⁶⁵⁴
- The World Bank-supported Myanmar Telecommunications Sector Reform Project Land Lease Guidelines provides valuable guidance for other ICT companies involved in land acquisition, including calling for the identification of the presence of ethnic minorities during scoping and screening phases.⁶⁵⁵

⁶⁵⁴ IFC, "[Environmental, Health, and Safety Guidelines for Telecommunications](#)" (April 2007).

⁶⁵⁵ World Bank, "[Myanmar - Telecommunications Sector Reform Project: environmental and social management framework \(Vol. 2\): Land lease guidelines](#)" (English) (2013).