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*Information Collection Title:* Reporting Requirements for Responsible Investment in Burma

Bureau of Democracy, Human Rights, and Labor  
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U.S. Department of State  
2201 C Street NW  
Washington, D.C.

We, the undersigned civil society groups from Burma/Myanmar (hereinafter “Myanmar”), welcome the opportunity to voice our support for the U.S. Reporting Requirements for Responsible Investment in Burma. We ask the U.S. Government to renew the Reporting Requirements, as they provide an important tool for ensuring new foreign investment in Myanmar is accountable, transparent and contributes to the development of Myanmar and the democratic reform process.

New investment is still in the early stages, and the information required by the Reporting Requirements will be increasingly important to Myanmar civil society. The outcome of the recent elections will likely lead to an increase in foreign investment in Myanmar. But the military remains outside of democratic accountability structures under the 2008 Constitution. Removing the Reporting Requirements just as high risk foreign investment ramps up would weaken the NLD and civil society’s push for transparency and responsible investment. A return to secretive foreign investment in an economy that is still controlled by cronies and military owned companies risks exacerbating conflict, land rights disputes, corruption and other serious human rights threats.

The Reporting Requirements offer transparency that would not exist if they were not required by the U.S. Government. This access to information is crucial for promoting and protecting human rights, and ensuring accountability and transparency of corporations operating in Myanmar. This sets a benchmark for companies from other countries investing in Myanmar.

In addition, we would urge the Obama Administration to strengthen the Reporting Requirements to expressly require investors to report who their Myanmar business partners and contacts are, including names and national identity numbers of all individuals who ultimately own and control them. Companies should not be able to hide, or ignore, the connections that some of their partners have to serious corruption or human rights abuse. Companies that fail to comply with this, or other provisions of the Reporting Requirements, should be sanctioned. We would also urge you to make all reported information public including contact with Myanmar military and armed groups, and steps companies have taken to identify and mitigate risks with respect to environmental issues, human rights, worker rights and anti-corruption.

Lastly, recognizing that an important purpose of the Reporting Requirements is to enable civil society to access this information, then the Reporting Requirements themselves, as well as the

reports submitted by companies, need to be available in Myanmar language. It is restrictively difficult for communities and civil society groups to access the information and engage in the process when it is not in Myanmar language. Additionally, due to the limited internet connectivity, it would be useful to have this information available at the U.S. Embassy in Yangon.

We recognize that foreign investment has the potential to have a significant impact on our country's transition, so long as it is accountable and transparent. We urge you to renew the Reporting Requirements as part of the U.S. Government's stated policy of promoting and supporting transparency in Myanmar.

Sincerely,

1. Our Future Initiative (OFI)
2. The Seagull; Human Rights, Peace and Development
3. Dawei Development Association (DDA)
4. EarthRights International (ERI)
5. Tarkapaw Youth Group
6. Tenasserim River and Indigenous People Networks (TRIP NET)
7. Sein Yaung So(Activities)(Tada-U)
8. Land Core Group (LCG)
9. Tavoyan Women's Union
10. Sierra Club
11. Kachin Peace Network
12. Kachin Women Peace Network
13. Association of Human Rights Defenders and Promoters- HRDP
14. Magway EITI Watch Group
15. Green Network Sustainable
16. Environment Group
17. Hands of Unity Group
18. ME Community Development Center 5.Organic Agro and Farmer Affair Development Group
19. .Kyauk Htep Community Library
20. Myaing Youth Development Organization
21. Green Future
22. Shwe Yenatha Labour Union
23. Farmer Union - Magway
24. Farmer Right and Development Organization
25. Organic Farmer Organization
26. Natural Sever Community
27. Mintae Village Development Group