

Mr. Raja Kumar
Financial Action Task Force
2 Rue André Pascal
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France

NRC Geneva, 19 October 2022

Dear President of the Financial Action Task Force (FATF)

We are writing to ask that FATF carefully considers humanitarian implications, when deciding whether Myanmar should be added to the list of 'high-risk jurisdiction', in light of the population's overwhelming reliance on international aid flows and remittances. As FATF President, we urge you to issue a public statement emphasising the need to preserve and protect aid deliveries to the people of Myanmar, and ensure any FATF measures are proportionate, risk-based, and do not impede humanitarian operations.

Myanmar's population face enormous challenges. More than 14 million people need humanitarian assistance, 1.3 million are internally displaced, and around 40 percent of the population live below the poverty line. Providing emergency aid in Myanmar is already extremely challenging, with a range of restrictions imposed on non-governmental organisations (NGOs), including on access to financial services. Blacklisting by FATF risks further tightening Myanmar's financial channels, impacting remittances, humanitarian programme funds transfers, and other international financial transactions that are critical to support the basic needs of a population.

We have seen time and again that international correspondent banks take commercial decisions to withdraw critical financial services when the international community indicates heightened levels of risk. Financial industry experts have noted that most international financial institutions would avoid servicing accounts linked to Myanmar rather than undertake the additional internal paperwork and reputation risk that operating in a FATF-blacklisted country would entail.

In line with FATF Recommendation 8 on non-profit organisations and Recommendation 29 on the role of the Financial Intelligence Unit (FIU), FATF actions on Myanmar should be focused, proportionate, and in accordance with international human rights principles and due process norms. Systemic and sustainable safeguards should therefore be put in place to mitigate the unintended negative effects of FATF actions on humanitarian aid delivery in Myanmar.

Given the significance of the humanitarian crisis in Myanmar, we urge you to consider the following actions in order to minimise disruption to aid flows:

- State clearly the need to ensure humanitarian aid is not disrupted in the FATF President's post-Plenary press conference.
- Conduct a review of any unintended consequences of adding Myanmar to the list of 'high-risk jurisdictions'.
- Carefully monitoring Member State's compliance in relation to protecting humanitarian operations, including reporting on this in the next FATF plenary.

Yours sincerely,



Cecilia Roselli

Director of Humanitarian Policy and Representative Office in Geneva
Norwegian Refugee Council