# Summary of Consultation Meetings on the Draft Myanmar ICT Sector Wide Impact Assessment

Yangon, Myanmar: 17th & 18th June 2015
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# Consultation Background

## Aims of a Sector Wide Impact Assessment (SWIA)

The sector-wide impact assessment (SWIA) on the Information and Communication Technologies (ICT) sector is intended to provide an overall picture of potential negative and positive impacts of the ICT sector on society in Myanmar for a wide range of audiences: government, parliamentarians, business, civil society, communities, trade unions and media. The SWIA reviews a sample of current ICT projects and future plans across Myanmar to identify potential key risks, particularly human rights risks, arising from the sector and its continued development.

The SWIA is not a "name and shame" exercise.  The ICT SWIA research is intended to highlight key risks at different levels – individual ICT operations, cumulative ICT activities in a concentrated area, and aggregate impacts from the sector as a whole. From this research, it suggests policy, legal and operational recommendations to a range of actors to prevent negative impacts to people in Myanmar occurring as a result of ICT sector activities and enhance positive impacts – particularly in light of the expected rapid development of the sector. The aim of the ICT SWIA is to help inform forthcoming laws and regulations for the ICT sector, allow ICT companies to undertake their own risk assessments with a wealth of information on the potential human rights risks they may pose to people, and provide relevant information for community/civil society interaction with ICT companies.

## Aims of the June 2015 Stakeholder Consultations

The Myanmar Centre for Responsible Business (MCRB) and the Institute for Human Rights and Business (IHRB) held three consultation meetings on 17th, 18th, and 22nd June 2015 with a total of 69 stakeholders, under the Chatham House rule (i.e. no attribution of comments to particular speakers or organisations):

- **June 17th:** Burmese language consultation in Yangon with businesses, government regulators, service providers, civil society groups, NGOs, and development partners (28 participants).
- **June 18th:** English language consultation in Yangon with businesses, service providers, civil society groups, NGOs, and development partners (25 participants).
- **June 22nd:** English language consultation in London with businesses, development partners, consultancies, law firms, and civil society organizations (16 participants).

A draft of the ICT SWIA was published in advance of the consultations, and is available on the MCRB website. The draft ICT SWIA for consultation represents the majority of the report, excluding a chapter on law and policy (an indicative table of contents for the final ICT SWIA is included in the consultation draft).

The consultations focused in particular on the findings from field research across Myanmar and the recommendations made in the draft ICT SWIA.  Comments received during the consultation will be considered and used to improve the final version of the SWIA report.

**Participants were asked to address the following questions:**

1.  On a sector-wide basis (rather than a project-specific basis) – Do these findings sound appropriate? Have we missed key issues? Have we misdiagnosed?
2.  What are the key recommendations and actions you would suggest – for the Government and for companies operating in the sector and other stakeholders? Who needs to act on them?
3.  What are the linked initiatives happening in Myanmar within government, by development partners, NGOs and other actors that are linked to the ICT sector and would be relevant to highlight?

# Day 1 – Yangon Consultation Conducted in Myanmar Language

## 1. Hate Speech and Freedom of Expression

### 1.1 Stakeholder Comments

*   Overall, there is low level of awareness regarding the impact of hate speech in Myanmar. For many ICT users, Facebook is the main social media platform and generally viewed as "the Internet".
*   Many users do not know that there are "report abuse" functions on social media websites, or do not know how to use the functions.
*   Currently, existing laws and regulations impacting freedom of expression in Myanmar exclude reference to the impact of behavior resulting specifically from ICTs.
*   Transparency reports focused on Government/law enforcement requests for data are issued by some social media platforms and telecommunications operators, but not all.  Some such reports are starting to refer to requests from the Government of Myanmar.
*   There is a lack of social media guidelines across public and private institutions in Myanmar.
*   There is a lack of oversight of hate speech behaviour online in Myanmar. For example, a third party monitoring system that would alert local authorities if online activity was at risk of escalating to real-life violence.

### 1.2 Stakeholder Recommendations

*1.2.1 For Government*

*   To add specific mention of ICTs to the laws (e.g. media law, non-discriminatory law, anti-violence against women law) to protect against online harassment or hate speech using ICTs. An example for the anti-violence against women law might include language focused on online harassment or sexual blackmail.
*   Establish social media guidelines to be used by institutions, including in the private and public sector.

- Establish a 3rd party independent body to monitor hate speech, to identify the degree of hate speech (e.g. hate speech leading to communal violence) and to recommend follow-up actions.
- Create an "alert system" to prevent any communal violence resulting from on-line hate speech. This system could support and inform relevant authority to prevent communal violence from spreading (e.g. Mandalay 2014 riots).

*1.2.2 For Companies*

- Promote awareness of Facebook's Community Standards, which outline what content is acceptable and unacceptable to post on Facebook.
- Ensure that materials promoting the community standards and reporting functions are available in Burmese and in other ethnic languages.
- Initiate a public awareness campaign focused on platform-specific guidelines and the impacts of hate speech spread through media. Ensure that all materials are translated into local languages to improve understanding.
- For social media platforms, including messaging service providers, and telecommunications operators to issue transparency reports detailing government or law enforcement requests for information or content censorship. Ensure these reports are available in local languages.

## 2. Privacy/Lawful Interception, Cyber Security and Cybercrime

### 2.1 Stakeholder Comments

- Many people in Myanmar grew up under a repressive surveillance regime, and are familiar with methods of physical surveillance, such as being followed. However, the majority do not know how digital surveillance is carried out and who has access to their data, phone records, etc.
- There is a prevailing lack of trust between the public and the government, as well as a belief that the government will not protect or respect citizens' privacy or personal data. There is a feeling among the general public that there is still physical surveillance and that government agencies likely monitor their digital communications.
- The term 'privacy' and accompanying terminology are very new to Myanmar. Culturally, people in Myanmar have a limited understanding of the concept of privacy.
- There is a lack of understanding in the Burmese culture about why privacy online is important and basic steps users should take to protect it, eg. using passwords to protect their online accounts and information.
- Out of three telecommunications operators in Myanmar, only one telecommunications operator issues a transparency report disclosing interception requests from law enforcement, including cases the company complies with.
- One Myanmar telecommunications operator mentioned that they have an in-house policy regarding lawful interception, allowing them to provide data to the government in serious criminal cases. This operator has a specific department for lawful interception to review the requests. Requests must have an authorized signature of Ministry of Communications Information Technology to be reviewed by the operator before providing any data.
- There is no oversight body (parliamentary or otherwise) for lawful interception, and no clear process in place.

- The Ministry of Communications and Information Technology (MCIT) has mandated a system that in theory requires an ID, which is recorded, to buy a SIM card. However in practice, people use their own ID and buy multiple SIM cards for their friends and family members. People have raised concerns regarding data protection and their ID being associated with another user's activity incorrectly. It was noted that in many other countries (e.g. Thailand and India), people are not required to show IDs or register with their IDs to purchase SIM cards.

## 2.2. Stakeholder Recommendations

### 2.2.1 For Government

- Enact a legal framework for lawful interception (a commitment was made by the Government of Myanmar, but a draft has not yet been published for public consultation).
- Clarify the process for requests from law enforcement to telecommunications operators to provide user data, including judicial authorisation and procedural oversight.
- Educate journalists on ICTs and human rights issues, including lawful interception, to support their ability to raise public awareness and foster an informed debate among the public.
- Provide trainings for lawyers and judges to build capacity and familiarity with ICT issues related to lawful interception, data privacy and other human rights risks.
- Raise public awareness around the importance of privacy when using ICTs, including foundational knowledge, such as the need for a strong and secure password.
- Provide education on privacy, hate speech and human rights when using ICTs in public school curriculum.
- Expand initiatives on ICT education with school children to support the objectives of the Ministry of Communications and Information Technology (MCIT) and Myanmar Computer Federation (MCF).
- Eliminate the system of mandatory SIM card registration policy.

## 3. Network rollout: Land, Labour and Stakeholder Engagement

### 3.1 Stakeholder Comments

- Companies awarded standardised licenses can lease land for mobile tower construction. If needed, the Ministry of Communication and Information Technology (MCIT) liaises with city development committees to ensure the permitting process stays on schedule.
- MCIT has carried out negotiations with other government departments or regional governments to assist tower companies with the site acquisition process in the cases of land held by ministries or City Development Councils (CDCs, e.g. Yangon CDC or Mandalay CDC). The price of land outside any city has been set at 200,000 kyats (per month/per lease area, approximately 50' x 50' per tower) and 300,000 kyats for land inside the city.
- Leaflets have been distributed by the Myanmar Government to inform citizens that mobile towers do not pose general public health risks based on data from the World Health Organization, but these have not been distributed country-wide due to budget constraints.

MCIT provides the content to mobile network operators and tower-related companies to print and distribute in the areas they are working.

- Community members are unsure where they can send complaints regarding the rollout process. Sometimes complaints are sent directly to the President, MCIT, City Development Councils, etc. It often can take time for the complaint to arrive to the proper individual at MCIT from the incorrect government office.
- Telephone operators hired sub-contractors for tower station construction and fibre cable installation. There are issues ensuring sub-contractors follow necessary guidelines for labour standards and land acquisition. When there is a complaint and construction is halted, the tower companies are impacted as they have made significant investment in raw materials (capital intensive business to construct towers).
- Community members want a strong mobile reception, but do not want towers built nearby. In order to have strong reception, towers are necessary.

## 3.2 Stakeholder Recommendations

- It was noted that site hunter jobs for identifying potential tower locations across Myanmar have provided some jobs for women.  Participants suggested this should be reflected in the ICT SWIA final report.
- MCIT has submitted a recommendation to the President's Office regarding process improvement and how complaints should be handled.  Follow up is needed.

## 4. Access to Information, including accessibility of vulnerable groups

### 4.1 Stakeholder Comments

- Digital literacy, such as understanding privacy settings, is important when interacting with ICTs and is at a very low level across Myanmar, particularly outside the major cities.
- There is a need for terms and conditions/agreements to be translated to support a clear understanding by local users.
- There is a need for nationwide access to telecommunications (voice and internet) outside of major cities like Yangon.
- While some participants recommended that CSOs should function as a bridge between the Government and public, one participant challenged the reliability and ethics of CSOs, especially in reaching and supporting grassroots community engagement.

### 4.2 Stakeholder Recommendations

*4.2.1 For Government*

- Access to Information is important as well as an effective feedback mechanism for the public to give feedback on information requests (to ensure data is relevant and timely).
- Government should establish community centres across the country. These centres should play a role in both information collection and information dissemination. Government Ministries (Union and State/Regional) should have one collective website where different statistics and data are combined. This would make it easier for the public to obtain data.

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- In areas outside of current telecommunications coverage, there should be a communication system in place which allows members of parliament or public sector officials to relay information from constituents in remote areas (e.g. satellite phone). It is essential that public sector officials can relay information from their constituents directly from the ground to Naypyitaw while encouraging communication between the government and community.
- Government websites (Including at the State/Regional level) should also provide space for public comments. Outreach mechanisms should use more creative channels so that the public not only has access to information but also becomes more interested in the information being disseminated.
- Government's legal frameworks are not interconnected; the Union Government should make these legal frameworks more cohesive. There is a lack of understanding of laws and policies among the Government Ministries. The different laws and policies that are relevant to one Ministry need to be well understood, respected and coherently implemented by other Ministries as well.
- Collaborative ways should be considered to work with CSOs, the public and other stakeholders, and the Government should use media more to provide information access and find ways to deliver news in more interesting ways to public.
- Digital Literacy should be taught at an early age and should be compulsory in the Basic Education system.
- Establish a response mechanism, such as emergency response for natural disasters. The Union and State/Regional Governments should collaborate with other stakeholders such as mobile operators and use mobile network as a way to disseminate emergency information to the wider public. Call centres should be effectively managed (e.g. 911 emergency calls).
- Resources for social / emotional support are needed, for example a mental health hotline, suicide prevention, or domestic violence resources. This kind of improved infrastructure allows for people to communicate across the country to promote social welfare. Such call centres should also be made available in ethnic languages, with training provided for call centre teams, and an emphasis on recruiting staff who speak ethnic languages.
- Myanmar people are hungry for information. More content should be made available online and through voice services (dial in hotlines for example, with audio recordings). This includes TV and radio broadcasting (with services in ethnic languages), online and podcasts to download and listen, etc. This services should also be made widely accessible in ethnic regions in ethnic languages.

### 4.2.2 For Companies

- Businesses should ensure that their job announcements are reaching as many local people as possible to ensure equal opportunities for all Myanmar people.
- Businesses should promote job creation for people with disabilities (e.g. call centres).
- Business should also make their business profiles/information easily accessible to the public. Business should strive for transparency and incorporate responsible business practices throughout their organisation.

### 4.2.3 For Civil Society

- Collaboration, communication and coordination must be improved among CSOs. A collective information dissemination process should be explored. For example, one website that

provides all update information of all CSOs (nation-wide, but also regionally and in ethnic languages).

- CSOs should continue to engage with the Union and State/Regional Governments and communities to improve relations. Functional relationships will improve the ability of CSOs to support the public's access to information.

### 4.2.4 For Ethnic Regions

- There needs to be increased partnership where Government and CSOs work together.
- Voice services supporting improved ICT use and communication should be made available and accessible to the local people in their preferred language.
- There should be information / community centres which includes libraries, talk shows, internet access and trainings to develop economic opportunities in the region.
- These centres could also provide services (e.g. community members charging their phone battery for a small sum, and while they wait learning about community information resources). Women should take a leadership role at these resource centres.
- Businesses can also play a role in providing access to these centres, such as providing satellite phone services for use in serious emergency situations. Since businesses have committed to providing universal services they should also consider emergency telecommunications infrastructure to rural areas outside of the current rollout area.

### 4.2.5 For Media

- It is necessary that access to information and media coverage is nationwide, not only Yangon but also for local communities. Online media should be utilised in addition to traditional print media. Media should also collaborate with Government (Union and State/Regional) in these process and provide technical support so as to provide information access to wider public.
- There should be news-only television channels, which also broadcast in ethnic languages, as well as TV and broadcasting services that are broadcasted in specific languages.

# Day 2 – Yangon Consultation Conducted in English Language

## 1. Hate Speech and Freedom of Expression

### 1.1 Stakeholder Comments

- Social media supports two-way conversation where people can voice their opinions. One of the best ways to counter hate speech is with positive messages.
- The line separating hate speech and freedom of expression varies in every country, which makes it especially hard for social media platforms, such as Facebook, to monitor what may be regarded as hate speech in another country.
- There is a low level of awareness about how to report abusive online content to the service provider eg. social media, and what action the company may take.

- Citizens often open many social media or other online accounts under fake names, which questions the effectiveness of some service provider's "real name policies" in the context of Myanmar.

## 1.2. Stakeholder Recommendations

### 1.2.1 For Governments

- Add ICT-specific considerations and provisions to current and future laws and regulations.
- Update or clarify existing laws to include sections on hate speech and freedom of expression.
- Encourage influential institutions and individuals (religious, governmental etc.) to speak out against hate speech, as well as promote responsible social media usage (including within the institution itself).

### 1.2.2 For Companies

- Facebook terms and conditions, and other social media guidelines in general, must be translated into local languages.
- All companies should publish specific ICT guidelines that educate employees how to responsibly use social media and the Internet.
- Increase education of how to use, why to use and the results of using social media platforms' "content reporting" functions.
- Increase public knowledge of the link between ICT and human rights and encourage more CSOs to spark conversation around human rights online.

## 2. Privacy/Lawful Interception, Cyber Security and Cybercrime

### 2.1 Stakeholder Comments

- The concept of privacy as outlined in international human rights standards is not fully understood in the context of Burmese culture, in which people live in close proximity and often with extended family, making the notion of a truly private space in Myanmar an less common reality.
- Therefore, there is a lack of understanding of the importance of the right to privacy online and the consequences of privacy infringement e.g. posting personal information such as bank details online.

### 2.2. Stakeholder Recommendations

- Clear legislation on lawful interception is needed.
- Provide businesses and communities with education on privacy, lawful interception and the risks of poor cyber security and increasing global cybercrime.
- Ensure that businesses' terms and conditions or privacy policies are publically available so users or customers are aware of what personal data may be collected or shared.

## 3. Network Rollout: Land, Labour and Stakeholder Engagement

### 3.1 Stakeholder Comments

- Overall stakeholder engagement in the ICT sector, by Government or companies, is very weak.
- Communities have raised concerns over why the land lease for towers is higher than their incomes, leading some to feel there might be a health risk associated with living near mobile phone towers.
- There is the perceived dilemma of concerns about health risks of living near a mobile phone tower on one hand and for those hosting a tower on their land, receiving a regular and significant source of income for the next 15 years on the other hand. Since 2 -3 lakhs per month is a significant sum for people, especially living in rural, it tends to win over their concerns on health or other matters.
- Because there is a requirement to meet national rollout targets as quickly as possible, the importance of stakeholder engagement and public consultation is sometimes overlooked. It is often not easy for companies to know who the stakeholders are in specific communities due to the speed of the rollout and performance targets.

### 3.2. Stakeholder Recommendations

*3.2.1 For Companies*

- Tower companies need to be more active in the public consultation process.
- Tower companies should include a guide or process map that identifies step-by-step each part of the rollout and what needs to be done during the construction process. They should also identify opportunities for engagement during the network rollout.
- Develop a model contract template (in local language) that is used by all telecommunications operators and subcontractors for the land lease process. This model contract should be approved and include government oversight.
- The leasing process should have a local CSO or legal aid organization that provides explanations on the terms and conditions of the contract. When tower companies provide the contract to the land user/owner, there should also be information provided as to where they can find additional third party legal aid (e.g. contact numbers for hotlines providing clarification on the contract terms) to help landowners clarify additional questions over the phone. It is important that the person responding may talk to the callers in their chosen language and give correct information.
- Ensure the company representative assigned as a site hunter and responsible for getting leases signed is following contracting processes correctly. There should be a checklist (for required documentation or permits) that is shared with other stakeholders (including landowners, authorities) in order to promote greater transparency.
- International companies typically have higher safety standards than local companies and sub-contractors. Therefore, mandate standards for worker and job site safety and to engage with local supply chains, and require submission and publication of HSE statistics for tower companies.

- Raise awareness through trainings to local and sub-contracted companies on safety and auditing on-site. There should also be guidelines in local languages.
- There should be an industry wide HSE system and training course. Major licensees can take charge in running such workshops and best practices from other countries should be adopted.

## 4. Access to Information, including accessibility of vulnerable groups

### 4.1 Stakeholder Comments

- A variety of factors can restrict access to information or exclude vulnerable groups. These include digital literacy level, hardware type, language, reading and writing ability, geographic location, basic connectivity, socio-economic factors.

### 4.2. Stakeholder Recommendations

#### 4.2.1 For Government

- Publish a quarterly report of aggregate sector-level data from operators, including their achieved regional penetration, data consumption trends, and data at sub-region. This information will help to better support rollout of access to the network for all Myanmar people (and achieving universal service targets for operators).
- Given that the majority of ICT users are engaging via a mobile device, Government websites (ministries or city-level like Yangon City Development Council) should be mobile friendly, meaning full functionality from mobile devices including smartphones and tablets.
- Government websites and tools should be made user friendly, and if possible be designed in tandem with actual user testing. This is the practice most major companies use for product design (e.g. user feedback).
- All websites should be available in multiple languages, with an emphasis on Unicode for Myanmar language fonts. There should also be additional offline options such as hotlines, or dial in with speech instruction.
- Government (Union and State/Regional) should partner and engage with the ICT sector (e.g. startups, developers) to improve development of e-government applications, as opposed to relying on outside foreign consulting firms.
- All data must be searchable and sortable. This should include a proper migration plan from Zawgyi to Unicode, including clearly stipulated standards by Government. For example, regarding a company licensed to publish online content, their license should include provisions mandating them to publish content in Unicode.
- Regarding import regulations, original equipment manufacturers and hardware companies should be required to use the Myanmar language as their default/out of box language.
- Information about customer service standards and complaints mechanisms should be made publicly available by all ICT companies, and mandated by Government.
- All companies involved in the land acquisition and network rollout should be required to have a complaints line in local languages.
- The Post and Telecommunications Department should provide a model contract template for land leases to ensure a standard procedure is followed by tower companies.

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- All data should be required to be in Unicode and reflected in ICT licensing agreements with the relevant ministry.

### 4.2.2 For Companies

- Inform users of existing conversion tools, such as Myanmar Computer Federation's Zawgyi-Unicode converter.
- Private companies should provide ICT4D support, particularly through community specific initiatives. This would entail understanding what the biggest issues are facing the community and working to use ICT to combat those issues.
- Accelerate ICT4D development through partnerships with local CSOs. Expand various applications of ICT4D in communities.
- Dedicated CSOs are one option for providing a grievance channel regarding the land acquisition process.

# Day 3 – London Consultation Conducted in English Language

## General Comments

- **Government consultation on ICT law and policy:** Stakeholders were aware that there have public consultations on ICT laws and policies held by the Ministry for Communications and Information Technology (MCIT). But there are major improvements needed in the way the government is consulting, i.e. only two weeks to provide input and no transparency as to how the stakeholder input will be used. Companies should engage transparently in the process and use their leverage to improve the legal framework.

- **Conflict issues:**
  - **Risks of creating a digital divide in conflict areas:** Stakeholders queried whether there were any restrictions on geographic coverage of the network rollout due to conflict issues. If so, this could create a "digital divide" reinforcing inequality in conflict areas unable to access and benefit from ICTs.
  - **Transparency is needed over ICT company interactions with public and private security:** Stakeholders noted the role of the military and armed groups was seen as one of the least proactive areas of engagement in Myanmar regarding progress since the democratisation process began. Stakeholders noted that very little information is known regarding ICT company interactions with public and private security providers in conflict areas.

- **Data Interception and Surveillance:** Stakeholders queried whether other Government Ministries and authorities were involved in data interception requests, or if such activities were confined to the Ministry of Communications and Information Technology.
- **Many human rights risks are inter-connected**: Freedom of association, freedom of assembly and non-discrimination are all interconnected issues. This is particularly well illustrated regarding meta-data. This should be considered in the ICT SWIA.

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- **Access to effective remedy during the tower rollout process**:
  o **Operational level grievance mechanisms in practice is pretty poor:** Much more accountability and accessibility needs to be demonstrated by operators and other ICT companies.
  o **The pressure to meet targets works against meaningful consultation:** The rollout process dis-incentivises the use of effective operational-level grievance mechanisms. Tower companies and sub-contractors are under pressure to build 17,300 towers in 3 years (targeting 75% coverage by 2016). Tower companies have characterised Myanmar as a relatively easy market to put up a tower, which could implicitly reflect that companies are not asking questions on the ground and taking community objections. There are many steps from the sub-contractor back to the operator.
  o **Layers of sub-contracting create lack of transparency and accountability in practice:** There is a growing ecosystem of suppliers in Myanmar – six main suppliers currently with layers of sub-contractors actually doing the work. This makes it very difficult to create accountability and transparency where the rollout is happening on the ground.
  o **Infrastructure sharing is not happening:** In the beginning of the rollout, infrastructure sharing was proposed. The current reality is the tenancy ratio means there is essentially one operator on a tower. This means if the operator is seeking coverage in a desirable area, tower companies have to race. The commercial reality of putting tower companies in competition with each other outweighs the incentive to implement these basic practices. It is critical to address the market structure at the root in order to achieve meaningful consultation on the ground.
  o **Recommendation:** Companies need to be sharing structures to minimise the number of towers, and operators (companies "at the top of the food chain") need to cascade requirements for meaningful community consultation and grievance mechanisms down the subcontracting chain.

- **Child online safety issues:**
  o **The ICT SWIA needs to be more explicit:** Child safety online is noted in the ICT SWIA, generally assuming the ICT industry will take the lead on preventing impacts to children. But this should be followed up with specific recommendations to industry. As the report is currently drafted this is not included.
  o **Child safety in the context of other human rights:** Child online safety should also be reflected in relation to other human rights issues, such as freedom of expression. Child online safety is one of the classic ways to actually censor people online in practice, by saying speech should be restricted to protect children. This is similar regarding arguments against anonymity – it can often be a guise for censorship and impacts on privacy, rather than a genuine measure to protect children. So it is important to consider child protection issues in the context of other rights as well.
  o **Recommendations:** The Government should develop a more comprehensive framework protecting children, while at the same time asking the ICT industry to share their expertise and experience from other countries.
- **Child safety during tower and other ICT construction:** Experiences from the mining sector around the world were shared, in particular the risk that as network rollout operations progress (e.g. trucks coming through to construct) this can lead to additional child safety threats, for example for those children staying at the camps unattended.

- **Filtering content:** In the UK, there are many different operators and a very low level of transparency as to what content is being filtered. Overall the "why and how" component of filtered content globally is not readily available. If systems allow filtering, there must be transparency to allow site owners to understand why their site has been filtered.
  - o **Transparency is critical:** It is very important to get transparency incorporated into the regulatory framework, as well as to provide clarity on what companies themselves are allowed to publish. This also impacts what companies themselves are able to report regarding transparency measures. Operator contracts and requirements are not public in Myanmar.

- **Fuel theft:** Stakeholders noted that both operations and security are often powered by generators, which has led to challenges around fuel theft in other countries. Stakeholders noted fuel theft does not yet seem to be a major problem in Myanmar, but anticipated this was due to people being unaware of its existence at tower sites. There is a potential risk for the future, in cases where security guards may have been attacked, which can then fuel local conflicts. This can also raise gender discrimination implications, where compensation is paid to male heads of household rather than the person impacted.
- **Benefits of electricity and fuel sharing:** A major challenge in Myanmar stakeholders noted was there is no grid feed in tariff to sell excess energy capacity to the local community. Communities are therefore missing out on the potential benefits of energy generated by tower infrastructure.