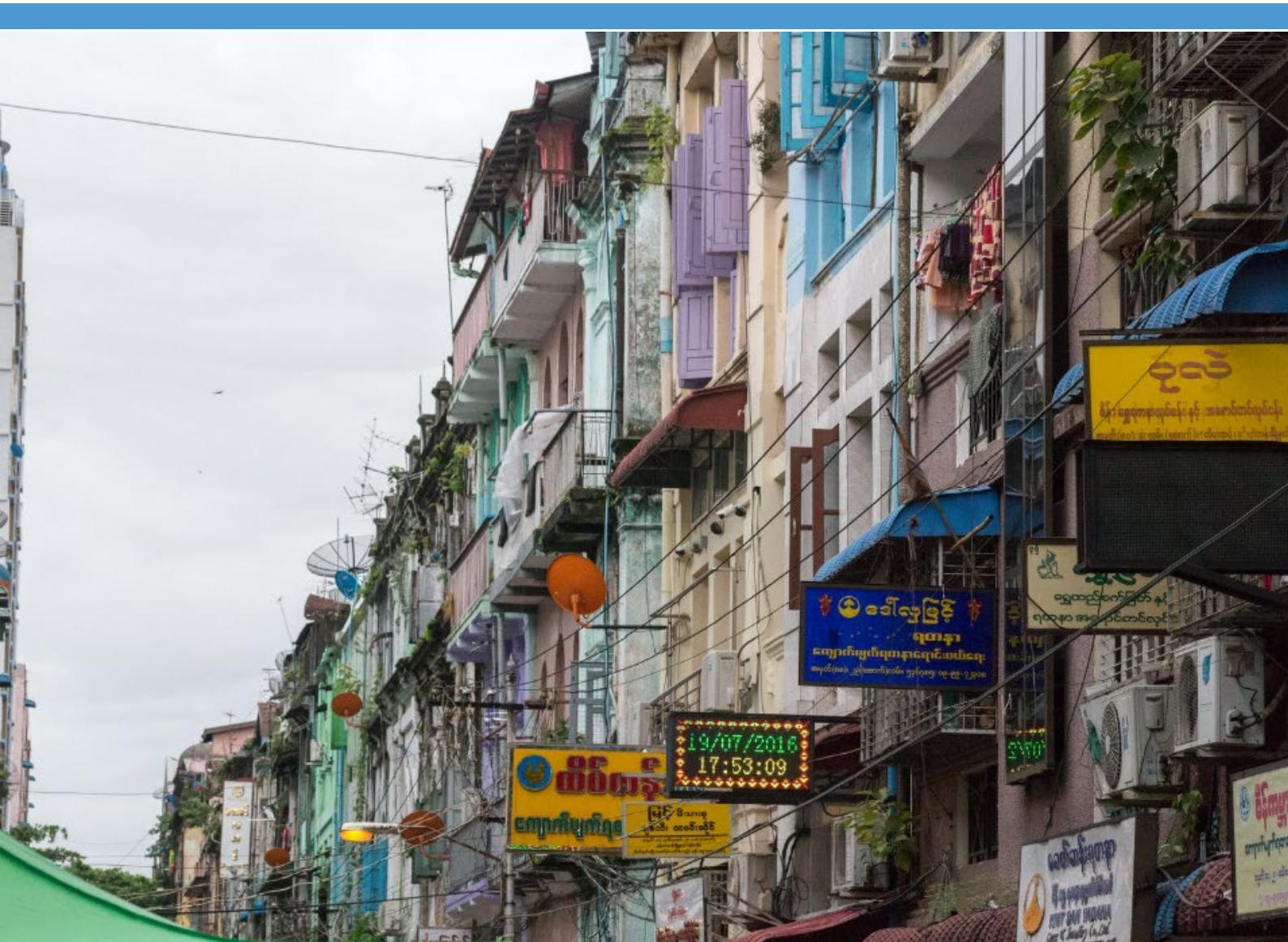


# The Critical Role of Civil Society Organisations in Documenting Atrocity Crimes in Myanmar



## Acknowledgments

This paper is a publication of the Asia Pacific Centre for the Responsibility to Protect. Research and writing this paper was by Dr Beth Rowan APR2P Research Fellow. Research assistance was provided by Htet Htet **Aung**.

<https://doi.org/10.14264/b626601>

## Communications:

Asia Pacific Centre for the Responsibility to Protect  
School of Political Science and International Studies  
The University of Queensland St Lucia Brisbane QLD 4072 Australia  
Email: [r2pinfo@uq.edu.au](mailto:r2pinfo@uq.edu.au)  
<https://r2pasiapacific.org/>

Image <https://www.flickr.com/photos/virtualwayfarer/>

© Asia Pacific Centre for the Responsibility to Protect  
All Rights Reserved

January 2026



The critical role of civil society organisations in documenting atrocity crimes in Myanmar © 2025 by Beth Rowan is licensed under Creative Commons Attribution-NonCommercial 4.0 International

# TABLE OF CONTENTS

## Contents

<u>1. Introduction</u> .....	4
<u>2. The Strategic Importance of CSO Documentation in Myanmar</u> .....	5
<u>2.1. International Mechanisms Depend on Local Evidence</u> .....	5
<u>2.2 Redefining the Justice Pipeline</u> .....	5
<u>3. Who are the CSOs?</u> .....	6
<u>4. What Roles Are CSOs Playing in Justice and Accountability?</u> .....	7
<u>4.1. Core Functions</u> .....	7
<u>4.2. Legal and Strategic Documentation for International Mechanisms</u> .....	8
<u>5. Challenges Facing CSOs in Documentation Work</u> .....	9
<u>5.1. Legal and Regulatory Repression</u> .....	9
<u>5.2. Security and Access Risks</u> .....	10
<u>5.3. Technical Challenges in Evidence Collection</u> .....	11
<u>5.4. Ethical and Psychological Burdens</u> .....	12
<u>5.5. Financial Fragility and Sustainability Gaps</u> .....	12
<u>Conclusion and Recommendations</u> .....	13
<u>References</u> .....	16

# Introduction

In Myanmar today, civil society organisations (CSOs) have become the principal actors documenting atrocity crimes and preserving evidence for international justice, not through official mandate, but because no other actor is positioned to do so.

Since the military coup of February 2021, Myanmar has experienced a collapse of lawful governance. The junta has carried out widespread and systematic violence against civilians, including artillery attacks, arbitrary arrests, torture, and sexual violence.<sup>1</sup> Civil society has been dismantled, pro-democracy figures imprisoned or exiled, and the country is now formally categorised as “closed” by the CIVICUS Monitor.<sup>2</sup> Domestic courts and institutions do not operate with independence, and international investigators have been denied access to the country.<sup>3</sup>

Within this context of repression and impunity, CSOs have emerged as the primary source of atrocity documentation.<sup>4</sup> Working from exile, border regions, or in secrecy within Myanmar, these groups are gathering survivor testimonies, archiving digital evidence, and assembling legal case files for international mechanisms.<sup>5</sup> Their work underpins ongoing accountability efforts, including proceedings under the universal jurisdiction framework in Argentina.<sup>6</sup> Myanmar represents a significant point in the broader evolution of international investigations, where non-state actors, particularly civil society organisations, are producing the core evidentiary record in the near-complete absence of state cooperation or direct international access. While previous contexts such as Syria and the DPRK also saw civil society play pivotal documentation roles,<sup>7</sup> Myanmar exemplifies a deepening shift wherein civil society is often leading the evidence-gathering process itself.

This report maps the evolving role of Myanmar’s CSOs in the pursuit of international justice. It suggests that these actors have the potential to reshape how accountability is pursued in international legal processes, due to their foundational role in evidence collection. To understand this shift, the report offers a field-level analysis of the CSO ecosystem: their identities, their core functions, and the structural constraints they navigate. It examines the growing dependence of international justice mechanisms on civil society evidence, and considers the legal, technical, and ethical challenges that arise as a result. At its core, the report demonstrates that the future of justice in Myanmar now hinges not only on international courts or commissions, but on the survival, credibility, and sustainability of Myanmar’s civil society itself. It concludes with recommendations for supporting the integral role CSOs are playing in the pursuit of justice and accountability for atrocity crimes in Myanmar.

---

<sup>1</sup> Amnesty International. *Myanmar: Four Years After Coup, World Must Demand Accountability for Atrocity Crimes* (2025), <https://www.amnesty.org/en/latest/news/2025/01/myanmar-four-years-after-coup-world-must-demand-accountability-for-atrocity-crimes/>

<sup>2</sup> CIVICUS. *Monitor Tracking Civic Space* (2025), [https://monitor.civicus.org/globalfindings\\_2023/](https://monitor.civicus.org/globalfindings_2023/)

<sup>3</sup> Human Rights Council. *Situation of Human Rights in Myanmar* (2024).

<sup>4</sup> Konstantina Stavrou, “Civil Society and the IIIM in the Investigation and Prosecution of the Crimes Committed Against the Rohingya” (2021) 36(1) *Utrecht Journal of International and European Law*, 95–113, <https://doi.org/10.5334/ujiel.525>

<sup>5</sup> The Centre for Information Resilience. *Digital Investigations: Human Stories* (2025), <https://www.info-res.org>

<sup>6</sup> Maaike Matelski, Rachel D. LLM, & Brianne McGonigle Leyh, “Multi-Layered Civil Society Documentation of Human Rights Violations in Myanmar: The Potential for Accountability and Truth-Telling” (2022) 14(3) *Journal of Human Rights Practice*, 794–818.

<sup>7</sup> See for example: United Nations Human Rights Council. (2014). *Report of the commission of inquiry on human rights in the Democratic People’s Republic of Korea* (A/HRC/25/63). United Nations., International, Impartial and Independent Mechanism for Syria. (n.d.). *Civil society*. IIIM. (Retrieved August 26, 2025)

## 2. The Strategic Importance of CSO Documentation in Myanmar

### 2.1. International Mechanisms Depend on Local Evidence

Civil society documentation of atrocity crimes and human rights abuses in Myanmar has become an essential source of evidence for international accountability efforts. These crimes, such as genocide, war crimes, and crimes against humanity, are governed by international legal frameworks such as the Genocide Convention, the Rome Statute of the International Criminal Court (ICC)<sup>8</sup>, the UN Charter<sup>9</sup>, and customary international law.<sup>10</sup> Allegations of these crimes require the investigation and prosecution of perpetrators,<sup>11</sup> and as such, to pursue legal accountability, international mechanisms such as the ICC, the International Court of Justice (ICJ), and universal jurisdiction depend upon the collection and preservation of timely evidence that meets strict thresholds of admissibility, authenticity, and reliability.<sup>12</sup>

Historically, such evidence has been collected by state authorities or UN-mandated fact-finding missions.<sup>13</sup> In Myanmar, however, such access has been almost entirely blocked.<sup>14</sup> International investigators have been denied entry, and domestic institutions remain under the direct control of the military junta, leaving them with no independence or capacity to pursue prosecutions for crimes committed by the state itself.<sup>15</sup> Under such circumstances, international investigators rely heavily on remote interviews for evidence collection, particularly with diaspora communities.<sup>16</sup>

Yet in Myanmar, local CSOs have assumed the frontline role in evidence collection, collecting the witness testimonies, photographic evidence, and victim accounts that now form the basis of international legal cases.<sup>17</sup>

### 2.2 Redefining the Justice Pipeline

This development builds on trends seen in other contexts where state-led or institutional investigations were obstructed, including Syria and North Korea, where civil society actors stepped in to document and preserve evidence in the face of institutional paralysis or access

---

<sup>8</sup> International Criminal Court, *Rome Statute of the International Criminal Court*, Article 69 (1998). Under Article 69 of the Rome Statute, evidence must be evaluated for its probative value and collected under conditions that respect due process and chain-of-custody standards: *“The Court may rule on the relevance or admissibility of any evidence, taking into account its probative value and any prejudice that such evidence may cause.”*

<sup>9</sup> United Nations, *Charter of the United Nations* (1945), <https://www.un.org/en/about-us/un-charter>

<sup>10</sup> Independent Investigative Mechanism for Myanmar, *Collecting Evidence and Case Building* (n.d.), <https://iimm.un.org/en/collecting-evidence-and-case-building>

<sup>11</sup> UNGA Resolution 2583, Question of the punishment of war criminals and of persons who have committed crimes against humanity, UN Doc A/RES/2583(1969) para 1.

<sup>12</sup> International Law Editorial Board, *The Role of Evidence in International Law: A Crucial Component* (2024), <https://worldjurisprudence.com/the-role-of-evidence-in-international-law/>

<sup>13</sup> United Nations Human Rights Council. *International Commissions of Inquiry, Commissions on Human Rights, Fact-Finding Missions, and Other Investigations* (2025), <https://www.ohchr.org/en/hr-bodies/hrc/co-is>.

<sup>14</sup> United Nations Human Rights Council. (2018). *Resolution adopted by the Human Rights Council on 27 September 2018-Situation of human rights of Rohingya Muslims and other minorities in Myanmar*, UN Doc. A/HRC/RES/39/2 (2018) (Resolution 39/2) preamble, 2 “The government of Myanmar denied access to the UN fact-finding mission and the Special Rapporteur in 2018”.

<sup>15</sup> Bar International Association. (2022). Crackdown on Human Rights Defenders, Opposition, and the Right to a Fair Trial in Myanmar., *Crackdown on Human Rights Defenders, Opposition, and the Right to a Fair Trial in Myanmar*.

<sup>16</sup> Justice and Equity Centre. (2021, August 18). *Restricted access interviews: A guide to interviewing witnesses in remote human rights investigations*.

<sup>17</sup> Dijkstra, R. LLM. (2022). Documenting human rights violations in Myanmar: the potential for truth-telling and accountability.

denial. In Myanmar, this pattern has become especially pronounced: civil society organisations have taken on a primary role in collecting evidence for international accountability in the absence of access for state-based or international investigators. This shift is significant for several reasons.

First, it adds to a growing body of practice challenging the assumption that only states or international institutions possess the authority or technical infrastructure to investigate international crimes.<sup>18</sup> In Myanmar, CSOs have assumed this role not through formal mandate, but through necessity, proximity to affected communities, and the practical ability to document where no one else can.

Second, it means that international mechanisms now rely on non-state actors to provide material that will form the basis for trials, legal complaints, and historical truth-telling. In the absence of access to crime scenes or state cooperation, institutions such as the Independent Investigative Mechanism for Myanmar (IIMM) must depend on documentation collected by CSOs. This reliance, in turn, shapes what kinds of cases can be brought, which patterns of abuse are visible to legal forums, and whose experiences are formally recorded.<sup>19</sup> The evidentiary process itself is now grounded in decentralised sources, raising new questions about standardisation, verification, and gatekeeping.

Third, it introduces increased legal and ethical responsibilities for CSOs, including the need to meet evidentiary standards, protect witnesses, and preserve data securely over time, due to the thresholds of admissibility, authenticity, and reliability that legal documentation must meet.<sup>20</sup> These responsibilities are compounded by resource limitations, security risks, and the emotional burden of working closely with trauma survivors. Yet, they are central to ensuring that CSO-collected material can contribute meaningfully to future prosecutions.

Finally, it reflects a paradigm shift in atrocity accountability. In closed or repressive states, international justice is increasingly driven not by institutions, but by communities, activists, and survivors themselves. Historically, evidence presented by UN investigators or states has often been afforded greater weight than that provided by CSOs in the prosecution of atrocity crimes.<sup>21</sup> However, in the absence of this investigatory capacity in Myanmar, what has emerged in its place is a decentralised system, in which documentation and evidence is generated almost exclusively by a diffuse network of civil society actors. What this means for the admissibility and authority of such evidence in international justice, however, remains an open and pressing question.

### 3. Who are the CSOs?

CSOs documenting atrocity crimes in Myanmar form a diverse and decentralised ecosystem, spanning ethnic regions, urban resistance groups, and diaspora communities. They include community-based monitors such as the Karen Human Rights Group (KHRG), ethnic human rights organisations like the Chin Human Rights Organization (CHRO) and Shan Human Rights Foundation (SHRF), and diaspora-led accountability actors such as the Burmese Rohingya Organisation UK (BROUK). Others, including Assistance Association for Political Prisoners (AAPP) and ND-Burma, contribute broad-based documentation, maintain records of state violence, and support legal or advocacy efforts.

---

<sup>18</sup> Stavrou, (2021),

<sup>19</sup> Rebecca J Hamilton, 'User Generated Evidence' (2018) 57(1) *Columbia Journal of Transnational Law* 1,39.

<sup>20</sup> Abbott, K. (2019). Myanmar: documentation practices may raise challenges for accountability.

<sup>21</sup> Freeman, L. "Prosecuting Atrocity Crimes with Open Source Evidence: Lessons from the International Criminal Court" in Dubberley, Sam, Alexa Koenig, and Daragh Murray (eds), *Digital Witness: Using Open Source Information for Human Rights Investigation, Documentation, and Accountability* (2019; online edn, Oxford Academic), <https://doi.org/10.1093/law/9780198836063.001.0001>, accessed 19 Apr. 2025. P51, 56

The operational realities of CSOs vary. Most CSOs are not registered under the junta's legal framework<sup>22</sup> and rely on informal or transnational networks to conduct interviews, archive documentation, and safely transmit evidence.<sup>23</sup> Some operate clandestinely within Myanmar, others work from border regions in Thailand and India, and many now operate in exile. Their staff are typically composed of activists, researchers, lawyers, survivors, and trained community members, many of whom work without formal protection, registration, or consistent funding.

Many CSOs have also built formal partnerships with international legal organisations such as Fortify Rights, Global Justice Centre, and the European Centre for Constitutional and Human Rights (ECCHR).<sup>24</sup> Much of the evidence collected by CSOs on the ground in Myanmar is eventually submitted to international mechanisms, typically via encrypted channels operated by exile-based partners or international legal partners. In this way, Myanmar's civil society is not only documenting crimes, but increasingly engaging in joint legal action on the global stage.

## 4. What Roles Are CSOs Playing in Justice and Accountability?

### 4.1. Core Functions

- *Evidence collection:* Collecting primary documentation of atrocity crimes, including eyewitness testimonies,<sup>25</sup> photo and video evidence,<sup>26</sup> conflict mapping and incident logs,<sup>27</sup> and satellite imagery analysis.<sup>28</sup>
- *Community-based monitoring and training:* Some CSOs train community monitors and fieldworkers in field data collection, such as human rights documentation methods, ethical interview techniques, and safe data collection protocols.<sup>29</sup>
- *Strategic advocacy:* Leveraging documentation to influence international bodies and states, including providing inputs to the UN Human Rights Council, supporting resolutions or sanctions campaigns, and amplifying accountability demands before the International Court of Justice and International Criminal Court.<sup>30</sup>
- *Data preservation:* Collaborating with international mechanisms for long-term preservation of data.<sup>31</sup>

---

<sup>22</sup> See section 5.1 below

<sup>23</sup> International Center for Not - For -Profit Law , H. (2023). *Assessment of Myanmar Civic Space : Changes, Challenges, and Impacts*. <https://www.icnl.org/post/assessment-and-monitoring/country-assessments/assessment-of-myanmar-civic-space>.

<sup>24</sup> Fortify Rights. (2025). Joint Statement: Myanmar: Four years after coup, world must demand accountability for atrocity crimes. <https://www.fortifyrights.org/mya-inv-stm-2025-01-31/>

<sup>25</sup> Karen Human Rights Group. (2025). <https://khrg.org/>. Chin Human Rights Organization. (2025).

<https://www.chinhumanrights.org/>. Network for Human Rights Documentation. (2025). <https://ndburma.org>

<sup>26</sup> Myanmar Witness. (2025). <https://www.info-res.org/myanmar-witness/>

<sup>27</sup> Shan Human Rights Foundation. (2025, April). *Five civilians killed, ten injured by SAC airstrikes and drone bombing in Nawngkho township*. <https://shanhumanrights.org/>. Assistance Association for Political Prisoners. (2025). *Daily briefing in relation to the military coup*. <https://aappb.org/>

<sup>28</sup> Fortify Rights. (2025). *Fortify Rights*. <https://www.fortifyrights.org>

<sup>29</sup> Karen Human Rights Group. (2025, April). *Statement on International Day for Mine Awareness and Assistance in Mine Action*. <https://khrg.org/2025/04/statement-international-day-mine-awareness-and-assistance-mine-action>

<sup>30</sup> Burma Campaign UK. (2025). *Burma Campaign UK policy briefs*. <https://burmacampaign.org.uk>

<sup>31</sup> Independent Investigative Mechanism for Myanmar. (n.d.). *Collecting evidence and case building*. <https://iimm.un.org/en/collecting-evidence-and-case-building>. The IIMM does not release the names of the CSOs who submit evidence to the mechanisms for security reasons.

- *Legal submissions to international mechanisms:* Preparing formal evidentiary dossiers for accountability proceedings, including direct submissions to the IIMM and universal jurisdiction cases. CSO-generated evidence has also fed indirectly into proceedings at the ICC and ICJ, however, this has typically occurred via intermediaries such as the IIMM, the UN Fact-Finding Mission, or legal NGOs.<sup>32</sup>

## 4.2. Legal and Strategic Documentation for International Mechanisms

One of the primary institutional recipients of CSO documentation is the Independent Investigative Mechanism for Myanmar. Established in 2018 by the UN Human Rights Council, the IIMM was explicitly mandated to operate without physical access to Myanmar's territory. As a result, it relies extensively on external partnerships with civil society organisations to gather and receive evidence relevant to international crimes.<sup>33</sup>

Many Myanmar-based and exile-led CSOs have developed secure, encrypted workflows for submitting documentation directly to the IIMM. The IIMM then uses these submissions to compile structured case files and evidentiary material, which may be shared with competent courts, including the ICC or national prosecutors under universal jurisdiction, upon request.<sup>34</sup> Beyond supporting the work of international mechanisms, CSOs have also played a direct role in initiating legal proceedings. In multiple jurisdictions, including Argentina, Germany, and the Philippines, CSO-led documentation has formed the evidentiary backbone of complaints filed under universal jurisdiction. These are not peripheral contributions. In many cases, CSOs themselves triggered litigation, acting in partnership with international legal NGOs to build admissible case files and support survivor-led testimony.

For example:

- In Argentina, the Burmese Rohingya Organisation UK (BROUK), supported by Fortify Rights, filed a complaint alleging genocide and crimes against humanity. The case has since progressed with judicial recognition.<sup>35</sup>
- In Germany, the legal complaint submitted under the *Völkerstrafgesetzbuch* (Germany's Code of Crimes Against International Law) was filed by Fortify Rights and supported by years of grassroots documentation from ethnic communities across Myanmar.<sup>36</sup>
- In the Philippines, a case focused on crimes in Chin State was built on Myanmar survivor testimonies and CSO-led investigation, with legal assistance from international experts.<sup>37</sup>
- In Turkey, the Myanmar Accountability Project (MAP) filed a complaint in Istanbul on behalf of torture victims held at the Ye Kyi Ain Interrogation Centre in Yangon. The

---

<sup>32</sup> Independent Investigative Mechanism for Myanmar (IIMM). (2023). *Annual report of the Independent Investigative Mechanism for Myanmar, A/HRC/54/20.* United Nations Human Rights Council., UN Human Rights Council. (2018). *Report of the Independent International Fact-Finding Mission on Myanmar, A/HRC/39/64.* United Nations.

<sup>33</sup> Independent Investigative Mechanism for Myanmar .(2018). *Collecting the evidence needed to ensure that perpetrators of serious international crimes in Myanmar face justice.* <https://iimm.un.org/en/faq>

<sup>34</sup> UN Human Rights Council. IIMM Report A/78/216 (2023)

<sup>35</sup> Fortify Rights & BROUK. (2023). *Rohingya Genocide Case: Update on Universal Jurisdiction Complaint in Argentina.* <https://www.fortifyrights.org/mya-inv-2023-03-22/>

<sup>36</sup> ECCHR. (2023). *Germany: Criminal Complaint on Atrocity Crimes in Myanmar.* <https://www.ecchr.eu/en/case/myanmar-crimes-against-humanity-genocide/>

<sup>37</sup> Legal Action Worldwide. (2023). *Philippines Case on Myanmar Crimes under Universal Jurisdiction* [Details to be confirmed based on filing document]. Dantes, L. (2024, April 9). *Crimes Against International Humanitarian Law in Myanmar: Will the Philippines Impose Universal Jurisdiction on behalf of Burmese Refugees?* Harvard International Law Journal.

complaint provided detailed evidence of systematic torture and named perpetrators, demanding that Turkish prosecutors pursue charges under universal jurisdiction.<sup>38</sup>

While multiple jurisdictions have accepted CSO-led complaints, Argentina remains the only case to have advanced to the stage of judicial action. In February 2025, an Argentinian court issued arrest warrants for Senior General Min Aung Hlaing and 24 other senior junta leaders, marking the first universal jurisdiction case to reach this stage and offering a rare glimpse of accountability for the Rohingya.<sup>39</sup> Germany's federal prosecutor declined to pursue the complaint on the grounds that the IIMM's mandate already covers the situation. In the Philippines and Turkey, the authorities have yet to issue a public response or initiate formal prosecutorial action on the complaints.<sup>40</sup>

## 5. Challenges Facing CSOs in Documentation Work

Despite their increasing centrality to international justice efforts, CSOs in Myanmar operate in one of the most repressive and volatile environments in the world. While their documentation work is foundational to accountability for atrocity crimes, CSOs conduct these activities without the formal status, protections, or institutional resources typically afforded to investigative bodies.

This section outlines five interrelated challenges facing Myanmar's CSOs in the documentation of core international crimes: legal repression, security risks, technical barriers, ethical burdens, and financial fragility. Each constraint carries implications not only for the safety of documentation teams, but also for the quality, admissibility, and long-term sustainability of the evidence they produce.

### 5.1. Legal and Regulatory Repression

Myanmar's post-coup legal framework has been systematically reshaped to criminalise civil society activity, making evidence collection a legally hazardous task. The Organisation Registration Law (2022)<sup>41</sup> mandates that all CSOs register with junta authorities, exposing them to surveillance, shutdowns, and legal harassment. Many organisations have chosen not to register, rendering their operations technically illegal and cutting them off from banking access and institutional donor funding.<sup>42</sup>

The regime has also weaponised Penal Code Sections 505(A) and 124 and the 2021 Anti-Terrorism Law to arrest and prosecute activists, including those involved in documentation.<sup>43</sup> Additionally, the Cybersecurity Law (2025) outlaws the use of virtual private networks (VPNs), encryption, and secure messaging apps, tools essential for safely transmitting interviews, photos, and case files.<sup>44</sup>

---

<sup>38</sup> Myanmar Accountability Project. (2022, March 29). *Unprecedented criminal procedure against Myanmar junta launched in Turkey: Criminal complaint for torture and crimes against humanity filed in Istanbul*

<sup>39</sup> Xu, W. (2025, February 27). *A glimpse of hope for the Rohingya: Argentinian arrest warrant for Min Aung Hlaing in the first universal jurisdiction case*. Verfassungsblog

<sup>40</sup> Independent Investigative Mechanism for Myanmar. (n.d.). *Universal jurisdiction*. Retrieved October 2 2025

<sup>41</sup> International Center for Not-For-Profit Law. (n.d.). *Myanmar: Overview of restrictive laws*. <https://www.icnl.org/wp-content/uploads/Myanmar-ORL-final.pdf>

<sup>42</sup> International Commission of Jurists. (2022). *Myanmar: A year after military takeover, no rule of law or judicial independence*.

<sup>43</sup> Ibid.

<sup>44</sup> The Diplomat. (2025, January). *Myanmar military junta enacts repressive new cybersecurity bill*. <https://thediplomat.com/2025/01/myanmar-military-junta-enacts-repressive-new-cybersecurity-bill/>

This legal framework places civil society actors in a state of persistent legal jeopardy. Because registration now requires engagement with junta authorities, many organisations have chosen to remain unregistered in order to preserve their independence.<sup>45</sup> This decision, however, renders their operations technically illegal under the Organisation Registration Law. As a result, fieldworkers risk surveillance, arrest, and prosecution for engaging in documentation work. Organisations operating outside the legal framework face severe barriers in accessing institutional funding, bank accounts, and securing legal protections.<sup>46</sup> The cumulative effect is that civil society in Myanmar is being systematically repressed.

## 5.2. Security and Access Risks

CSOs in Myanmar face extreme security challenges when conducting documentation work, particularly in areas of active conflict and military control. These risks shape the viability and continuity of evidence collection efforts.

Fieldworkers often operate in environments of pervasive surveillance and militarisation, making them vulnerable to arrest, torture, and targeted killings. Since the 2021 coup, over 28,000 people have been detained, including many activists and documenters.<sup>47</sup> CSOs report that simply transporting interview transcripts or photos can lead to arrest, enforced disappearance, or detention if discovered by military intelligence.<sup>48</sup>

Access to survivors is also highly restricted. Ongoing violence, displacement, and military checkpoints limit physical entry to crime sites or villages. In many instances, CSOs must rely on informal networks of community members or ethnic armed actors to access affected areas and gather testimonies.<sup>49</sup>

This precarious access has led to fragmentation in documentation efforts. Certain regions, especially those under tight military control, remain under-documented, while areas with active CSO networks are overrepresented.<sup>50</sup> This unevenness affects not only the completeness of the historical record but also suggests that the over-documented regions may shape international narratives, while under-documented areas risk being neglected in accountability mechanisms. In particular, conflict-affected areas such as Kayah/Karen, parts of Bago and Magway, Ayeyarwady, and remote zones like Naga and Kokang remain comparatively under-documented due to structural access barriers and the absence of sustained CSO presence.<sup>51</sup> Even digital transmission carries risk. Without secure digital channels, documents and testimonies are susceptible to interception or deletion. The Cybersecurity Law criminalises the

<sup>45</sup> The Frontier Myanmar. (2021, September 28). "CSOs after the coup: Operations squeezed; funding crunched". "CSOs after the coup: Operations squeezed, funding crunched". <https://www.frontiermyanmar.net/en/csos-after-the-coup-operations-squeezed-funding-crunched/>

<sup>46</sup> International Center for Not-For-Profit Law. (2022, November). *Civic space in Myanmar: In the post-coup and COVID-19 pandemic era*. <https://www.icnl.org/post/report/civic-space-in-myanmar>. Found in: <https://books.openedition.org/irasec/10213?lang=en>

<sup>47</sup> Assistance Association for Political Prisoners. (2025). *Daily briefing in relation to the military coup*. <https://aappb.org/?p=31913>

<sup>48</sup> Stavrou, 2021, p. 88

<sup>49</sup> Yamahata, M. T., & Yamahata, Y. (2025). *Civil society organizations and their role in building democracy in Myanmar: The case of the Kachin Women's Association Thailand*. In: Yamahata, C., Takeda, M. (eds) Youth, Community, and Democracy in India, Myanmar, and Thailand. Palgrave Macmillan, Singapore. [https://doi.org/10.1007/978-981-97-6378-8\\_17](https://doi.org/10.1007/978-981-97-6378-8_17)

<sup>50</sup> Matelski, M., & Dijkstra, R. (2022). *Multi-layered civil society documentation of human rights violations in Myanmar: Between memory, accountability, and strategic advocacy*. Journal of Human Rights Practice, 14(3), 794–816. <https://doi.org/10.1093/jhuman/huac031>

<sup>51</sup> For example, ND-Burma's 2024 dataset shows very low incident capture in Bago, Magway, Ayeyarwady and the Naga Self-Administered Zone, despite ongoing hostilities, while Karen/Kayah is acknowledged by CSOs themselves as an under-documented high-violence area. Access restrictions imposed by non-state actors also mean Kokang and Wa remain largely absent from independent documentation. Network for Human Rights Documentation–Burma. (2025). *Documentation in darkness: An overview of the human rights situation in Burma January–December 2024*. Network for Human Rights Documentation–Burma.

use of VPNs and encryption entirely, which are essential for safely moving documentation from field teams to international legal bodies.

Finally, many CSOs are compelled to adopt clandestine operational modes. Staff frequently relocate, rotate identities, or change workspaces to avoid detection. The psychological toll of working under continuous threat, compounded by the absence of protective infrastructure, is profound.<sup>52</sup>

In short, civil society documentation is a logistically complex, high-risk activity that exposes individuals to arrest, violence, and long-term imprisonment. Any international reliance on such documentation must be grounded in a recognition of the human cost borne by those collecting it and accompanied by concrete efforts to protect and support them.

### 5.3. Technical Challenges in Evidence Collection

Most CSOs in Myanmar were not founded as legal or forensic organisations. Their role in documenting atrocity crimes has developed out of urgent necessity rather than through access to formal training, legal protocols, or international evidentiary standards. As a result, multiple technical constraints affect the admissibility and probative value of the evidence they collect.

- Chain of custody<sup>53</sup> protocols may be incomplete or undocumented, making it difficult for courts to verify whether physical or digital evidence has been altered, contaminated, or mishandled during transmission. The absence of clear provenance undermines its reliability in court.<sup>54</sup>
- Visual evidence may lack embedded metadata, including timestamps, GPS coordinates, or source information, reducing its legal weight. Without technical verification of where, when, and by whom an image was captured, its authenticity can be easily challenged.<sup>55</sup>
- Interview practices can be inconsistent, particularly in fieldwork involving survivors of trauma, sexual violence, or detention. CSOs do not uniformly follow best-practice methods for legal interviewing, such as securing informed consent, avoiding leading questions, or using trauma-informed protocols.<sup>56</sup>
- Disparate data structures, including inconsistent naming conventions, duplicate entries, and vague geotagging, can all complicate the integration of material into legal case files. This has led to duplication resulting in questions over admissibility or reliability in legal forums.

These challenges directly determine whether otherwise powerful documentation can be used as admissible evidence. As international justice precedents show, including in Syria and Libya, evidence that fails to meet legal standards is often excluded, undermining accountability and retraumatising those who gave testimony in good faith.<sup>57</sup>

---

<sup>52</sup> Matelski & Dijkstra, 2022, p. 809; Stavrou, 2021, p. 88).

<sup>53</sup> Chain of custody refers to the documented process that records the handling of evidence from collection through to submission in legal proceedings, ensuring it has not been altered or tampered with.

<sup>54</sup> Fortify Rights. (2022). *Submission to the Independent Investigative Mechanism for Myanmar*

<sup>55</sup> Global Justice Center. (2023). *Myanmar Civil Society Evidence Documentation Gaps and Challenges*, Balkibayeva, Zhanagul. (2024). Problems of Admissibility and Reliability of Metadata as Evidence. *International Journal of Law and Policy*. 2. 48-58. 10.59022/ijlp.232.

<sup>56</sup> Opinio Juris. (2023, July 3). *Myanmar documentation practices may raise challenges for accountability*.

<https://opiniojuris.org/2023/07/03/myanmar-documentation-practices-may-raise-challenges-for-accountability/>, Global Justice Center. (2023). *Myanmar Civil Society Evidence Documentation Gaps and Challenges*

<sup>57</sup> Global Justice Center. (2023). *Myanmar Civil Society Evidence Documentation Gaps and Challenges*

## 5.4. Ethical and Psychological Burdens

Civil society actors documenting atrocity crimes are often exposed to intense emotional and psychological stress. Many fieldworkers engage with survivors of sexual violence, torture, or mass killings without formal training in trauma-informed methods or access to adequate mental health support.

Common risks include:

- Re-traumatisation of survivors through repeated or poorly conducted interviews, especially when interviewers lack knowledge of safe disclosure practices.<sup>58</sup>
- Collection of testimonies without full informed consent, which may result in survivors not fully understanding the implications of sharing their accounts for future legal use.<sup>59</sup>
- Secondary trauma and emotional burnout among documentation staff, who regularly process large volumes of distressing material without psychological care systems.<sup>60</sup>

While some guidelines exist, such as those from the International Institute for Criminal Investigations (IICI)<sup>61</sup> or UN documentation protocols<sup>62</sup>, few Myanmar-based CSOs have the financial or institutional capacity to integrate these systematically into field practice.<sup>63</sup>

## 5.5. Financial Fragility and Sustainability Gaps

The financial environment facing Myanmar's civil society has grown increasingly constrained since the 2021 military coup, leaving many CSOs contending with a shrinking pool of international support. Without sustainable financial backing, even the most committed organisations may be at risk of structural failure. In a context where CSOs serve as the backbone of atrocity evidence collection, this financial precarity poses a systemic threat to the continuity and quality of atrocity documentation efforts.

- USAID and other international donors have withdrawn or downsized operations, cutting off long-term funding streams for many CSOs.<sup>64</sup>
- Due to legal restrictions, unregistered CSOs cannot access formal banking systems, which forces them to rely on informal financial transfers, diaspora networks, or risky in-kind support.<sup>65</sup>

---

<sup>58</sup> Michels, A., & Javidan, E. P. (2024). *Integration of mental health and psychosocial support approaches in accountability mechanisms for atrocity crimes*. KPSRL.

<sup>59</sup> Critelli, F. M., & McPherson, J. (2019). *Women, trauma, and human rights*. In L. D. Butler & F. Critelli (Eds.), *Trauma and Human Rights: Integrating Approaches to Address Human Suffering* (pp. 157–172). Springer.

<sup>60</sup> Moayerian, N., Stephenson Jr., M., & Abu Karaki, M. (2023). Exploring Syrian refugees' access to medical and social support services using a trauma-informed analytic framework. *International Journal of Environmental Research and Public Health*, 20(3), 2031, Wyatt, Z. O. (2021). *Walking the journey of resilience and recovery from trauma for Cambodian young people*. ResearchGate.

<sup>61</sup> IICI. (2017). *International Protocol on the Documentation and Investigation of Sexual Violence in Conflict* (2nd ed.). International Institute for Criminal Investigations.

<sup>62</sup> Office of the United Nations High Commissioner for Human Rights (OHCHR). (2011). *Manual on Human Rights Monitoring*. United Nations.

<sup>63</sup> D'Alessandra, F. (2024). *The ten-year revolution: Civil society documentation in international criminal justice*. *Journal of International Criminal Justice*, 22(2), 311–334.

<sup>64</sup> Human Rights Myanmar. (2025). *America cuts \$1.1 billion for Myanmar, abandoning democracy and rights*. <https://humanrightsmyanmar.org/wp-content/uploads/HRM-USAID-cancellation.pdf>

<sup>65</sup> Global NPO Coalition on FATF. (2023). *Financial Action Task Force (FATF) actions on Myanmar: Unintended consequences on humanitarian aid*. <https://fatfplatform.org>

- Most grants available are short-term or project-based, with little coverage for core operating costs, security needs, or emergency relocation for at-risk staff.<sup>66</sup>

Taken together, these constraints form a dense and overlapping structure of risk that defines the operating environment for Myanmar's civil society. The challenges outlined above are not isolated, instead, they reinforce one another, compounding the difficulties of sustained documentation work, and revealing the deep fragility at the core of Myanmar's current accountability infrastructure.

Crucially, this fragility extends beyond local actors, as the IIMM is itself under growing financial strain. In July 2025, the Mechanism reported that it had only been allocated 73 per cent of its approved annual budget, resulting in cutbacks to recruitment, expert consultancies, field investigations, training, and IT systems. Additionally, recent UN budget cuts require the Mechanism to reduce its staff by 20 per cent by 2026.<sup>67</sup> On top of this, the Secretary-General's draft 2026 programme budget proposes a further 14–15 per cent resource cut within the broader human rights pillar.<sup>68</sup> Unless specifically protected, these layered reductions will compound the IIMM's financial vulnerability and further erode its ability to collect, analyse, and prepare evidence to the standards required for international criminal proceedings.

The precarity of both CSOs and the IIMM reveals a systemic weakness: Myanmar's evidentiary record depends on a fragile pipeline from local organisations to international mechanisms. When funding at either end falters, the entire accountability process is compromised.

---

<sup>66</sup> Wells, T., & Pruitt, P. M. (2024). *Amid revolution, Myanmar's NGOs face a deficit of donor solidarity*. New Mandala. <https://www.newmandala.org/amid-revolution-myanmars-ngos-face-a-deficit-of-donor-solidarity/>

<sup>67</sup> Independent Investigative Mechanism for Myanmar. (2025). *Annual report 2025*. United Nations Human Rights Council, p16

<sup>68</sup> United Nations. (2025, April 29). *Proposed programme budget for 2026: Part VI, human rights and humanitarian affairs; Section 24, human rights; Programme 20, human rights (A/80/6 (Sect. 24))*. United Nations General Assembly., United Nations. (2025, May 21). *Proposed programme budget for 2026: Part VI, human rights and humanitarian affairs; Section 24, human rights; Programme 20, human rights (Corrigendum) (A/80/6 (Sect. 24)/Corr.1)*. United Nations General Assembly.

# Conclusion and Recommendations

In the absence of state accountability and with international access blocked, the responsibility for preserving the evidentiary record of atrocity crimes in Myanmar has fallen to a dispersed, decentralised network of civil society organisations. These CSOs collect, analyse, and submit material that forms the basis of international legal action. Their documentation has catalysed universal jurisdiction complaints, supported the work of the Independent Investigative Mechanism for Myanmar, and preserved the narratives of survivors whose experiences would otherwise remain invisible. This shift reflects a broader transformation in international justice practice under conditions of sustained authoritarianism, where civil society actors increasingly lead documentation and legal efforts in the absence of institutional access.

However, this shift from state-produced to civil society-produced documentation is not without cost. CSOs operate in an environment of criminalisation, surveillance, and with chronic under-resourcing. Fieldworkers face legal risk, psychological strain, and personal danger. Many organisations are unregistered and financially isolated. Even when material is collected at great risk, it often lacks the technical scaffolding required for legal admissibility. In short, while CSOs are doing the work of accountability, they do so without the protections or resources typically afforded to that role.

If these CSO-led efforts are undermined by repression, burnout, or a lack of sustainable support, the infrastructure supporting international accountability for Myanmar will be significantly weakened. Likewise, continued reliance on civil society documentation without meaningful recognition of the burdens involved risks entrenching a model of justice that is extractive in practice and unsustainable in design. Importantly, what is at stake is not only the safety of individual organisations, but also the long-term viability of an emergent model of community-driven justice. Therefore, this report makes the following recommendations:

## **Recognise Civil Society Documentation as Legitimate Evidence**

International organisations and regional bodies such as ASEAN and AICHR should formally recognise CSO documentation as legitimate evidence. Much of this material already meets admissibility standards and has fed into proceedings at the ICJ, ICC, and universal jurisdiction cases. For bodies without fact-finding mandates or access, such as AICHR, recognition would provide a credible evidentiary basis for advocacy while also validating CSO roles, justifying donor investment, and acknowledging the disproportionate risks borne by local actors

## **Fund Sustainable Core Support for CSOs**

Donors should provide multi-year, unrestricted operational funding for Myanmar CSOs engaged in atrocity documentation. Sustainable financing is essential to reduce the disproportionate risks borne by frontline documenters and to safeguard the continuity of Myanmar's accountability infrastructure. Core support must cover salaries, security, emergency relocation, and psychosocial care, and be accessible to exile-based CSOs through flexible funding channels.

## **Expand Coverage to Under-documented Regions**

Donors should support CSOs on the ground and along the borders to expand their networks into under-documented regions. Without this, accountability risks being built on a partial record of violations that excludes entire populations. Implementation requires resourcing local and diaspora organisations to extend reach, strengthening fragile networks, and investing in secure data systems and psychosocial care for documenters.

## **Strengthen Technical Capacity and Ethical Standards**

International NGOs and legal support organisations should provide ongoing training and mentorship for Myanmar CSOs. High turnover and the risk of burnout mean that without sustained support, documentation quality and ethical standards cannot be maintained. Continuous accompaniment, rather than one-off workshops, is needed to uphold evidentiary standards and ensure material remains usable in accountability processes such as universal jurisdiction cases.

## **Safeguard the IIMM's Budget and Mandate**

Member States should ring-fence funding for the IIMM within the UN system, insulating it from austerity cuts. Predictable, multi-year voluntary contributions should supplement assessed funding to prevent staff downsizing and preserve essential expertise. The UN and its Member States should also establish a continuity plan to ensure that Myanmar's evidence remains actively used across accountability venues, including universal jurisdiction cases, domestic prosecutions, the ICC, and the ICJ.

## **Support Coordination Among Documentation Networks**

Donors and international partners should invest in platforms that enable CSOs to coordinate documentation efforts and harmonise standards. Effective coordination through cross-border networks will improve evidence consistency, efficiency, and inclusivity, ensuring that documentation efforts remain sustainable and impactful in accountability processes.

## **Centre Survivors in Accountability Processes**

Accountability efforts should recognise survivors not only as sources of testimony but as stakeholders in justice. Donors and mechanisms should prioritise psychosocial care, informed consent, and victim participation in shaping justice strategies, ensuring documentation practices serve those most affected.

## **Maintain Political Commitment to Accountability**

UN Member States should issue regular joint statements at the HRC and UNGA affirming that Myanmar accountability remains a priority. This visible political commitment is essential to sustain momentum, counter donor fatigue, and reassure CSOs and survivors that their risks and sacrifices are not in vain.

## References

Abbott, K. (2019, July 3). *Myanmar: Documentation practices may raise challenges for accountability*. Opinio Juris. <https://opiniojuris.org/2019/07/03/myanmar-documentation-practices-may-raise-challenges-for-accountability>

Amnesty International. (2025, January 31). *Myanmar: Four years after coup, world must demand accountability for atrocity crimes*. <https://www.amnesty.org/en/latest/news/2025/01/myanmar-four-years-after-coup-world-must-demand-accountability-for-atrocity-crimes>

Amnesty International USA. (2025). *Accountability for atrocities committed by Myanmar's military regime*.

Amnesty International. <https://www.amnesty.org/en/countries/asia-and-the-pacific/myanmar>

Assistance Association for Political Prisoners. (2025). *Daily briefing in relation to the military coup*. <https://aappb.org/?p=31913>

Bar Human Rights Committee of England and Wales. (2022). *Crackdown on human rights defenders, opposition, and the right to a fair trial in Myanmar*. <https://barhumanrights.org.uk>

Burma Human Rights Network. (2024). *Myanmar's ongoing human rights crisis*. <https://www.bhrn.org>

CIVICUS. (2025). *Monitor tracking civic space: Global findings 2023*. [https://monitor.civicus.org/globalfindings\\_2023](https://monitor.civicus.org/globalfindings_2023)

Critelli, F. M., & McPherson, J. (2019). Women, trauma, and human rights. In L. D. Butler & F. M. Critelli (Eds.), *Trauma and human rights: Integrating approaches to address human suffering* (pp. 157–172). Springer. [https://doi.org/10.1007/978-3-030-22277-1\\_9](https://doi.org/10.1007/978-3-030-22277-1_9)

D'Alessandra, F. (2024). The ten-year revolution: Civil society documentation in international criminal justice. *Journal of International Criminal Justice*, 22(2), 311–334. <https://doi.org/10.1093/jicj/mqae018>

Dantes, L. (2024, April 9). *Crimes Against International Humanitarian Law in Myanmar: Will the Philippines Impose Universal Jurisdiction on behalf of Burmese Refugees?* Harvard International Law Journal.

Dijkstra, R. (2022). *Documenting human rights violations in Myanmar: The potential for truth-telling and accountability*. [Unpublished master's thesis].

Fortify Rights. (2025, January 31). *Joint statement: Myanmar: Four years after coup, world must demand accountability for atrocity crimes*. <https://www.fortifyrights.org/mya-inv-stm-2025-01-31>

Fortify Rights, & Burmese Rohingya Organisation UK. (2023, March 22). *Rohingya genocide case: Update on universal jurisdiction complaint in Argentina*. <https://www.fortifyrights.org/mya-inv-2023-03-22>

Freedom House. (2025). *Myanmar's civil society under siege: A review of 2024*. <https://freedomhouse.org>

Freeman, L. (2019). Prosecuting atrocity crimes with open source evidence: Lessons from the International Criminal Court. In S. Dubberley, A. Koenig, & D. Murray (Eds.), *Digital witness: Using open source information for human rights investigation, documentation, and accountability* (pp. 153–174). Oxford University Press.

Global Fund for Women. (2023). *Women's rights in Myanmar: The impact of military rule*. <https://www.globalfundforwomen.org>

Global Justice Center. (2023). *Myanmar civil society evidence documentation gaps and challenges*. <https://globaljusticecenter.net>

Global Witness. (2023). *Myanmar: The consequences of military control over the economy*. <https://www.globalwitness.org/en/campaigns/myanmar>

Global NPO Coalition on FATF. (2023). *Financial Action Task Force (FATF) actions on Myanmar: Unintended consequences on humanitarian aid*. <https://fatfplatform.org>

Hamilton, R. J. (2018). User-generated evidence. *Columbia Journal of Transnational Law*, 57(1), 1–46.

Office of the United Nations High Commissioner for Human Rights. (2024, September). *Situation of human rights in Myanmar* (A/HRC/57/56; advance unedited version). United Nations. <https://www.ohchr.org/en/documents/country-reports/ahrc5756-situation-human-rights-myanmar-report-united-nations-high>

Human Rights Watch. (2024, March 1). *Myanmar's military junta continues to violate human rights*. <https://www.hrw.org/news/2024/03/01/myanmar-military-junta-continues-violate-human-rights>

Human Rights Myanmar. (2025). *America cuts \$1.1 billion for Myanmar, abandoning democracy and rights* [PDF]. <https://humanrightsmyanmar.org/wp-content/uploads/HRM-USAID-cancellation.pdf>

Independent Investigative Mechanism for Myanmar. (2025). *Annual report 2025*. United Nations Human Rights Council. <https://iimm.un.org>

Independent Investigative Mechanism for Myanmar. (n.d.). *Universal jurisdiction*. <https://iimm.un.org/en/universal-jurisdiction>?

International Center for Not-for-Profit Law. (2023). *Assessment of Myanmar civic space: Changes, challenges, and impacts*. <https://www.icnl.org/post/assessment-and-monitoring/country-assessments/assessment-of-myanmar-civic-space>

International Commission of Jurists. (2022). *Myanmar: A year after military takeover, no rule of law or judicial independence*. <https://www.icj.org/myanmar-a-year-after-military-takeover-no-rule-of-law-or-judicial-independence>

International Commission of Jurists. (2023). *Evidence and admissibility standards in Myanmar justice processes*. <https://www.icj.org>

International Criminal Court. (1998). *Rome Statute of the International Criminal Court*. United Nations. <https://www.icc-cpi.int/resource-library/documents/rs-eng.pdf>

International Criminal Court. (2024). *Myanmar and the ICC: Accountability for atrocities*. <https://www.icc-cpi.int>

International Federation for Human Rights. (2025). *Accountability for Myanmar's military junta*. <https://www.fidh.org/en/countries/myanmar>

International Law Editorial Board. (2024). *The role of evidence in international law: A crucial component*. World Jurisprudence. <https://worldjurisprudence.com/the-role-of-evidence-in-international-law>

Institute for International Criminal Investigations. (2017). *International protocol on the documentation and investigation of sexual violence in conflict* (2nd ed.). Author.

Independent Investigative Mechanism for Myanmar. (n.d.). *Collecting evidence and case building*. <https://iimm.un.org/en/collecting-evidence-and-case-building>

Independent Investigative Mechanism for Myanmar. (2018). *Collecting the evidence needed to ensure that perpetrators of serious international crimes in Myanmar face justice*. <https://iimm.un.org/en/faq>

Independent Investigative Mechanism for Myanmar. (2023). *Annual report of the Independent Investigative Mechanism for Myanmar* (A/HRC/54/20). United Nations Human Rights Council. <https://iimm.un.org>

International Center for Not-for-Profit Law. (2023). *Civic space in Myanmar: In the post-coup and COVID-19 pandemic era*. <https://www.icnl.org/post/report/civic-space-in-myanmar>

International Criminal Court. (2024). *Rome Statute of the International Criminal Court: Article 69(4)*. <https://www.icc-cpi.int>

International, Impartial and Independent Mechanism for Syria. (n.d.). *Civil society*. IIIM. Retrieved August 26, 2025, from <https://iimm.un.org/who-we-work-with/civil-society>

Justice and Equity Centre. (2021, August 18). *Restricted access interviews: A guide to interviewing witnesses in remote human rights investigations*. <https://jec.org.au/resources/restricted-access-interviews-a-guide-to-interviewing-witnesses-in-remote-human-rights-investigations>

Justice For Myanmar. (2024). *Open letter: Urgent call for swift action against the military junta to end its war of terror and protect civilians in Myanmar*. <https://www.justiceformyanmar.org/press-releases/open-letter-urgent-call-for-swift-action-against-the-military-junta-to-end-its-war-of-terror-and-protect-civilians-in-myanmar>

Justice For Myanmar. (2025). *Breaking the silence on Myanmar's military crimes*. <https://www.justiceformyanmar.org>

Karen Human Rights Group. (2025, April). *Statement on International Day for Mine Awareness and Assistance in Mine Action*. <https://khrg.org/2025/04/statement-international-day-mine-awareness-and-assistance-mine-action>

Kyaw. (2024). Laws as weapons of oppression: Challenges and resilience of Myanmar civil society in the post-coup. In C. Jaquet (Ed.), *Defiance, civil resistance and experiences of violence under military rule in Myanmar* (pp. 159–200). Chiang Mai University Press.

Legal Action Worldwide. (2023). *Philippines case on Myanmar crimes under universal jurisdiction* [Filing document].

Matelski, M., Rachel, D., & McGonigle Leyh, B. (2022). Multi-layered civil society documentation of human rights violations in Myanmar: The potential for accountability and truth-telling. *Journal of Human Rights Practice*, 14(3), 794–818. <https://doi.org/10.1093/jhuman/huac028>

Michels, A., & Javidan, E. P. (2024). *Integration of mental health and psychosocial support approaches in accountability mechanisms for atrocity crimes*. Knowledge Platform Security & Rule of Law (KPSRL). <https://www.kpsrl.org/publication/integration-of-mhpss-in-accountability-mechanisms>

Moayerian, N., Stephenson, M., Jr., & Abu Karaki, M. (2023). Exploring Syrian refugees' access to medical and social support services using a trauma-informed analytic framework. *International Journal of Environmental Research and Public Health*, 20(3), 2031. <https://doi.org/10.3390/ijerph20032031>

Myanmar Accountability Project. (2022, March 29). *Unprecedented criminal procedure against Myanmar junta launched in Turkey: Criminal complaint for torture and crimes against humanity filed in Istanbul*

Myanmar Witness. (2025). *Digital investigations: Human stories*. Centre for Information Resilience. <https://www.info-res.org>

Network for Human Rights Documentation–Burma. (2025). *Documentation in darkness: An overview of the human rights situation in Burma, January–December 2024*. ND-Burma.

Office of the United Nations High Commissioner for Human Rights. (2011). *Manual on human rights monitoring*. United Nations.

Opinio Juris. (2023, July 3). *Myanmar documentation practices may raise challenges for accountability*. Opinio Juris. <https://opiniojuris.org/2023/07/03/myanmar-documentation-practices-may-raise-challenges-for-accountability>

Pact. (2025). *Addressing the humanitarian challenges in Myanmar post-coup*. <https://www.pactworld.org>

Reporters Without Borders. (2024). *Press freedom in Myanmar: Declining and under threat*. <https://rsf.org/en/country/myanmar>

Rome Statute of the International Criminal Court. (1998). Article 69(4): *The Court may rule on the relevance or admissibility of any evidence, taking into account its probative value and any prejudice that such evidence may cause*. United Nations. <https://www.icc-cpi.int>

Shan Human Rights Foundation. (2025, April). *Five civilians killed, ten injured by SAC airstrikes and drone bombing in Nawngkhio township*. <https://shanhumanrights.org>

Stavrou, K. (2021). Civil society and the IIMM in the investigation and prosecution of the crimes committed against the Rohingya. *Utrecht Journal of International and European Law*, 36(1), 95–113. <https://doi.org/10.5334/ujiel.525>

The Centre for Information Resilience. (2025). *Digital investigations: Human stories*. <https://www.info-res.org>

The Diplomat. (2025, January). *Myanmar military junta enacts repressive new cybersecurity bill*. <https://thediplomat.com/2025/01/myanmar-military-junta-enacts-repressive-new-cybersecurity-bill>

United Nations. (1945). *Charter of the United Nations*. <https://www.un.org/en/about-us/un-charter>

United Nations. (2025, April 29). *Proposed programme budget for 2026: Part VI, human rights and humanitarian affairs; Section 24, human rights; Programme 20, human rights (A/80/6 (Sect. 24))*. United Nations General Assembly.

United Nations. (2025, May 21). *Proposed programme budget for 2026: Part VI, human rights and humanitarian affairs; Section 24, human rights; Programme 20, human rights (Corrigendum) (A/80/6 (Sect. 24)/Corr.1)*. United Nations General Assembly.

United Nations Human Rights Council. (2014). *Report of the commission of inquiry on human rights in the Democratic People's Republic of Korea (A/HRC/25/63)*. United Nations.

United Nations Human Rights Council. (2018, September 27). *Resolution adopted by the Human Rights Council on the situation of human rights of Rohingya Muslims and other minorities in Myanmar (A/HRC/RES/39/2)*. United Nations.

United Nations Human Rights Council. (2018). *Report of the Independent International Fact-Finding Mission on Myanmar (A/HRC/39/64)*. United Nations.

United Nations Human Rights Council. (2025). *International commissions of inquiry, commissions on human rights, fact-finding missions, and other investigations*. United Nations. <https://www.ohchr.org/en/hr-bodies/hrc/co-is>

Wells, T., & Pruitt, P. M. (2024, January 29). Amid revolution, Myanmar's NGOs face a deficit of donor solidarity. *New Mandala*. <https://www.newmandala.org/amid-revolution-myanmars-ngos-face-a-deficit-of-donor-solidarity>

Xu, W. (2025, February 27). *A glimpse of hope for the Rohingya: Argentinian arrest warrant for Min Aung Hlaing in the first universal jurisdiction case*. *Verfassungsblog*

Yamahata, M. T., & Yamahata, Y. (2025). Civil society organizations and their role in building democracy in Myanmar: The case of the Kachin Women's Association Thailand. In C. Yamahata & M. Takeda (Eds.), *Youth, community, and democracy in India, Myanmar, and Thailand* (pp. 263–284). Palgrave Macmillan. [https://doi.org/10.1007/978-981-97-6378-8\\_17](https://doi.org/10.1007/978-981-97-6378-8_17)