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What appears to be the Huitong 78 is visible at the former Puma Energy terminal in Thilawa, Myanmar, offloading jet fuel.

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Myanmar: New data suggests military still importing fuel for deadly air strikes despite sanctions

- Shipping data suggests attempt to evade sanctions in aviation fuel supply chain
- Direct sales of fuel diminish; instead intermediaries appear to aid purchase of fuel to Myanmar
- At least seven shipments of aviation fuel to Myanmar in 2023, with direct links to storage unit in Viet Nam
- 2023 the worst year for air strikes in Myanmar since coup three years ago

New evidence suggests Myanmar's military is using new tactics to import aviation fuel after sanctions were imposed in response to air strikes that have unlawfully killed and injured civilians, Amnesty International said today ahead of the third anniversary of the 2021 coup.

Shipping, satellite, trade and customs data analysis by Amnesty shows significant changes to how aviation fuel entered Myanmar over the past year, with the military appearing to use new routes and rely on storage units to obfuscate the origin of the fuel.

“After the international community took action on this deadly supply chain, the Myanmar military is ripping a page out of the sanctions evasion playbook to continue importing jet fuel,” said Montse Ferrer, Deputy Regional Director for Research.

“Air strikes have killed or injured hundreds of civilians across Myanmar in 2023, and left many feeling nowhere is safe. The best way to stop the Myanmar military from carrying out lethal air strikes is to stop all jet fuel imports into the country.”

Multiple buyers and storage units that conceal origin

The supply chain of aviation fuel to Myanmar appears to have shifted considerably since sanctions were passed by the UK, the USA, the EU and others last year. Buyers in Myanmar are no longer purchasing fuel directly but apparently relying on multiple purchases and sales of the same fuel to distance themselves from the original supplier of the aviation fuel.

Amnesty’s new research uncovers this apparent ruse.

The findings show that in 2023, as pressure built on companies and states to suspend shipments of jet fuel to Myanmar in the wake of an Amnesty International investigation into the supply chain, there was a lull in imports between January and March.

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>
> **Amnesty International's Montse Ferrer**

In April that year, they picked up again, and vessel tracking data, satellite imagery and customs and trade data show that at least six shipments entered the country between April and August in 2023. Then, in August, the US passed its latest round of sanctions on jet fuel, which appears to have led to another lull in imports from September to November, after which Amnesty identified one final jet fuel shipment in December 2023. The seven shipments, adding up to at least 67 kilotonnes of aviation fuel, represent an increase in shipments compared to 2021-2022, year on year.

While in 2021-2022 the majority of aviation fuel entered Myanmar as direct sales of fuel shipments – making it much easier to trace the supplier – in 2023, the fuel appears to have been bought and sold more than once, before arriving to Myanmar.

Further, the vessels identified by Amnesty picked up the aviation fuel at a storage unit in Viet Nam immediately prior to traveling to Myanmar.

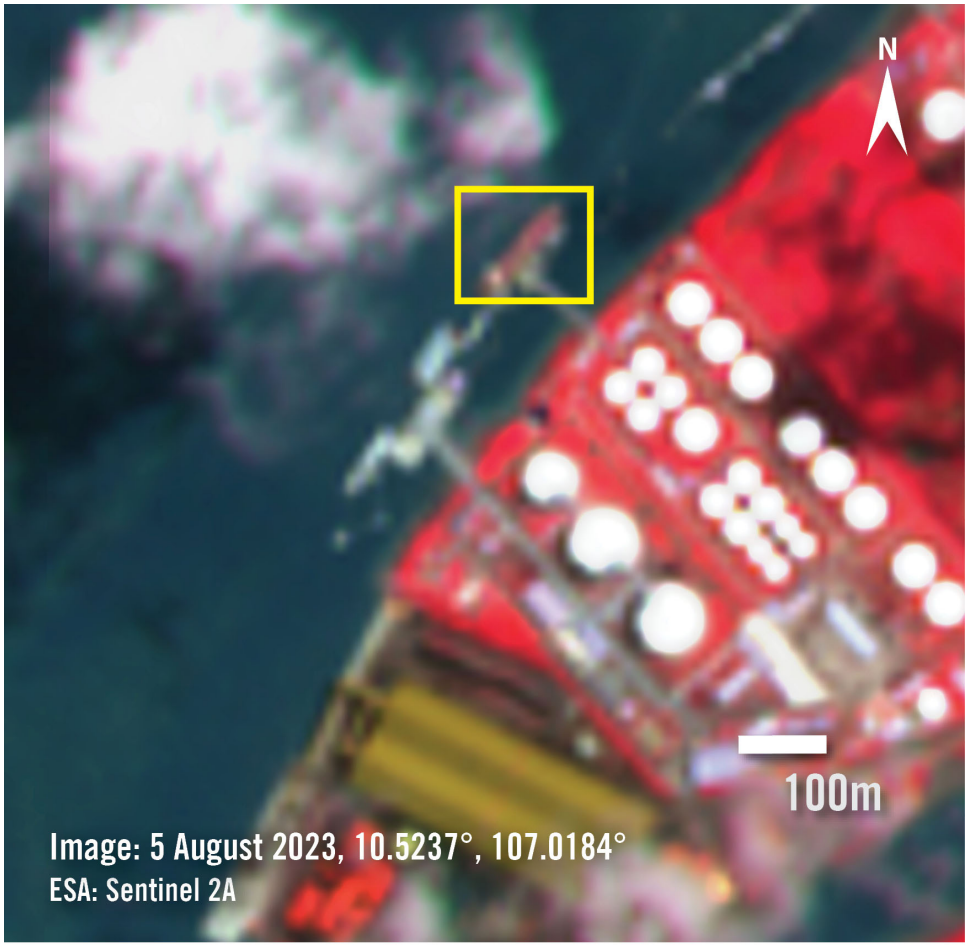
“This is significant because storage units make fuel notoriously hard to trace,” explains Ferrer. “A lot can happen at a storage unit – fuel can be blended to mask its origin; sellers can lose track of buyers as fuel changes hands; storage unit owners or managers can claim ignorance once the fuel arrives at rented-out tanks. In addition, the larger a storage unit, the more ships arrive with different types of cargo, making the tracing of goods by external actors virtually impossible.

“This could be a way to evade sanctions. Fuel is no longer sold by the supplier directly to a Myanmar – possibly sanctioned – entity, but through one or more intermediaries, while also ensuring that the vessel’s last stop before arrival in Myanmar is a storage unit which cannot be easily linked to the actual fuel supplier.”

Viet Nam connection

The seven shipments in 2023 loaded aviation fuel at a small storage terminal called Cai Mep Petroleum terminal close to Ho Chi Minh City, Viet Nam, which is operated by local company Hai Linh Co. Ltd. Shipments occurred in April, May, June, July, August and December.

Satellite imagery over Hai Linh Cai Mep shows a ship that is the same general size, shape and color as Huitong 78.



False-colour, near-infrared satellite imagery over Hai Linh Cai Mep shows a ship that is the same general size, shape and color as Huitong 78.

Vessel tracking and customs data has made it possible to identify what likely occurred during these shipments. First, the original supplier sold the jet fuel to a trader. That trader would have then off-sold it, once or multiple times, but in all cases, the second-to-last sale of the jet fuel before transfer to Myanmar was from a trader to a Vietnamese company. This Vietnamese company then received the fuel at a storage terminal in Cai Mep managed by Hai Linh. After storing the fuel for anywhere between a few hours to days, that fuel was sold to Myanmar and transported by vessel.

Amnesty has identified three shipments to Viet Nam that were immediately preceded by deliveries from recognizable locations. In one case, a shipment of jet fuel in August originated (although having been transported by a different vessel) from the China National Offshore Oil Corporation (CNOOC) terminal in Huizhou, the third-largest national oil company in China. According to vessel tracking data and satellite imagery, two other shipments in April and May onloaded the jet fuel at the Pengerang Independent Terminals, a storage terminal in Malaysia partly owned by Vopak, before arriving in Viet Nam and subsequently travelling to Myanmar (also by a different vessel).

Satellite imagery of the CNOOC port shows a ship that is the same approximate size, colour and layout as the Super Infinity.

Vietnamese customs data has also made it possible to identify the fuel traders that made the second-to-last purchase of jet fuel that transited through Viet Nam. The most prominent of these is BB Energy (Asia) Pte. Ltd., the Singapore branch of privately owned BB Energy, based in Dubai and described as “among the world’s leading independent energy trading companies”, with 30 offices around the world, including one in London. At least three of the seven shipments that transited through Viet Nam before arriving in Myanmar involved BB Energy (Asia).

It is unclear whether the trading companies knew the fuel they were selling to Vietnamese companies would soon thereafter end up in Myanmar, or whether their actions could run afoul of existing sanctions.

These traders sold the fuel to a Vietnamese company, which then appears to have sold the jet fuel to a Myanmar purchaser. Customs data indicates one of these companies to be Hai Linh Ltd., the company that owns and operates the storage terminal at Cai Mep.

Jet fuel offloaded in sanctioned-linked Yangon terminal

All seven aviation fuel shipments were offloaded at the former Puma Energy terminal in Thilawa area port, Yangon, Myanmar.

Following Puma Energy's departure from Myanmar in December 2022, it sold its assets and transferred the management of the Thilawa terminal to a joint venture between Shoon Energy Thilawa Terminal Co. Ltd. (formerly Asia Sun Aviation) and a state-owned and military controlled entity, MPE. Several Shoon Energy companies – although not the company managing the terminal – have been sanctioned by the UK, the USA, the EU and others for their role in the import and distribution of aviation fuel.

"The fact that these shipments are arriving at the same terminal with direct links to sanctioned companies and individuals and to the Myanmar military raises real questions about sanction effectiveness and compliance for those involved in the supply chain," Ferrer said.

> **"The Vietnamese government has an obligation to make sure its ports are not being used for activities linked to human rights violations.**
>
> **Amnesty International's Montse Ferrer**

Six of the seven Vietnamese shipments were transported by the Chinese-flagged oil tanker HUITONG 78 (IMO 9646479); the remaining shipment was done by Liberian-flagged oil tanker YIDA 8 (IMO 9936941). Amnesty was unable to confirm the current owners of these vessels.

Companies' responsibility and countries' obligations across entire value chain

As outlined in the UN Guiding Principles on Business and Human Rights, companies have a responsibility to seek to prevent or mitigate adverse human rights impacts by conducting human rights due diligence. In conducting such due diligence, international standards establish that companies should assess the entire value chain for human rights risks and

harm. In fact, companies can become directly linked to the harm – and in certain cases, liable under sanctions regimes – as a result of the irresponsible usage of the products or services they supply or manage. This includes jet fuel suppliers, fuel traders and storage terminal managers such as BB Energy, CNOOC, Hai Linh, Vopak and others.

“We have been told time and time again by companies that they are not responsible for what happens to the products after they sell them; or that they cannot control what happens at the storage terminals they themselves own and operate. However, the reality is that companies *can* know and *should* know what happens to their entire value chain if they are at all serious about human rights due diligence,” Ferrer said.

Under international law, all states have a duty to protect against human rights abuses by all actors, including companies. This means that states must protect individuals and communities from the harmful activities of corporate actors through effective policies, legislation, regulation and adjudication.

“The role played here by Viet Nam is particularly problematic. The Cai Mep port is essential for this new supply chain to work – and so the Vietnamese government has an obligation to make sure its ports are not being used for activities linked to human rights violations,” Ferrer said.

2023 worst year for air strikes

Myanmar military air strikes continued over the same period, with the **UN reporting** in September 2023 a significant increase compared to the first year after the coup.

In December 2023, Amnesty International **documented**, among other potential war crimes, the military’s indiscriminate air and ground attacks on Pauktaw town in Rakhine State, as well as its likely use of banned cluster munitions in northern Shan State.

Amnesty International also **documented** how, on 9 October, an air strike followed by mortar fire on a camp for internally displaced persons in Mung Lai Hkye village, Kachin State killed at least 28 civilians including children, and injured at least 57 others.

According to media reports, air strikes resulting in civilian deaths also took place in Bago and Sagaing Regions and in Chin, Kayah, Kayin and Mon states.

For example on 27 June, **air strikes** near a monastery in Nyaung Kone village in Sagaing Region killed a monk and at least nine other civilians.

On 11 April, in the single deadliest aerial attack since the coup, military aircraft bombed a gathering of people who were inaugurating a new local administrative office in the village of Pa Zyi Gyi, also in Sagaing Region. At least 100 civilians were killed, including 35 children, as well as 18 people aligned with armed opposition groups.

The military admitted the attack but claimed that explosives stored at the site where the gathering was taking place were responsible for the scale of the fatalities.

“There’s an epidemic of deadly, unlawful air strikes in Myanmar, but the cure is clear. We have to stop jet fuel imports from ending up in the hands of the Myanmar military,” Ferrer said.

Background

Since the 1 February 2021 coup, air strikes have killed, maimed and displaced civilians across the country, targeting schools, IDP camps and other civilian infrastructure.

In response, Amnesty International published *Deadly Cargo: Exposing the Supply Chain that Fuels War Crimes in Myanmar* in November 2022, which it published in collaboration with Justice for Myanmar.

The report revealed how aviation fuel reached the country, how it ended up with the Myanmar military and how it reached bases from which air attacks that constituted war crimes were conducted. In March 2023, Amnesty published updated findings on new shipments.

Following evidence linking foreign and domestic companies to the supply of aviation fuel to the Myanmar military, the UK, the USA, Canada, the EU and Switzerland imposed sanctions on companies and individuals in Myanmar and Singapore involved in the procurement and distribution of aviation fuel into Myanmar.

In August, the USA extended the reach of potential sanctions, stating that anyone involved in this industry was at risk.

All companies named in this press release were contacted for comment with the exception of Shoon Energy Thilawa Terminal Co. Ltd, who were contacted by Amnesty International at the time the findings against them were originally published. The only company to respond to Amnesty International for this press release is Royal Vopak who emphasised their respect

for human rights and claimed to have no record of a vessel birthing at Pengerang storage terminal on or about the dates we identified. This conflicts with Amnesty's own evidence.

Vessel	Vessel IMO	Load port	Immediately preceding stop	Arrival date in Myanmar	Offloading terminal	Arrival date in Myanmar
HUIT ONG 78	9646479	Hai Linh terminal, Cai Mep, VN	Unknown	20/12/2023	Shoon Energy, Thilawa	9.81
HUIT ONG 78	9646479	Hai Linh terminal, Cai Mep, VN	CNOOC terminal, Huizhou, PRC	15/8/2023	Shoon Energy, Thilawa	9.91
HUIT ONG 78	9646479	Hai Linh terminal, Cai Mep, VN	Unknown	7/7/2023	Shoon Energy, Thilawa	10.09
HUIT ONG 78	9646479	Hai Linh terminal, Cai Mep, VN	Unknown	16/6/2023	Shoon Energy, Thilawa	5.01
HUIT ONG 78	9646479	Hai Linh terminal, Cai Mep, VN	Pengerang terminal, Malaysia	26/5/2023	Shoon Energy, Thilawa	9.99
HUIT ONG 78	9646479	Hai Linh terminal, Cai Mep, VN	Unknown	4/5/2023	Shoon Energy, Thilawa	10.00
YIDA 8	9936941	Hai Linh terminal, Cai Mep, VN	Pengerang terminal, Malaysia	20/4/2023	Shoon Energy, Thilawa	12.81