Open letter to the Government of the Netherlands, Airbus SE's domicile, calling for scrutiny of Airbus' business with AVIC, which continues to transfer aircraft and associated equipment to the criminal Myanmar military junta

To:
Caspar Veldkamp, Minister of Foreign Affairs
Dirk Beljaarts, Minister of Economic Affairs
Eelco Heinen, Minister of Finance

February 5, 2025

Re: Airbus' business relationship with Aviation Industry Corporation of China (AVIC)

During the four years after the February 2021 attempted coup in Myanmar, the military junta continues to commit war crimes, crimes against humanity and other gross human rights abuses against the people of Myanmar with impunity. This campaign of terror is only possible through the junta's continued access to arms, including combat aircraft, and related technical maintenance, repair and overhaul assistance.

A key supplier of military aircraft and maintenance to the junta is the Aviation Industry Corporation of China (AVIC).[1]

As you will surely be aware, **'Airbus is a key investor and partner of AVIC'** . With ongoing credible documentation and reporting at the United Nations of the human rights crisis in Myanmar[2] and the role of AVIC in supplying arms to the junta,[3] Airbus must know that its collaboration with AVIC is highly problematic. Yet Airbus has maintained its collaboration with AVIC, as well as its investments in multiple AVIC subsidiaries through the Hong Kong publicly listed company, AviChina Industry & Technology Company Limited (AviChina).

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[1]Justice For Myanmar and Info Birmanie 2024. 'Airbusted: How Airbus' close partner AVIC is supplying arms to the Myanmar military and what Airbus should do about it', https://www.justiceformyanmar.org/stories/airbusted.

[2]See, for example, the United Nations Special Rapporteur on the situation of human rights in Myanmar, 2022. Conference Room Paper of the Special Rapporteur, Enabling Atrocities: UN Member States' Arms Transfers to the Myanmar Military. 22 February 2022. A/HRC/49/CRP.1, paragraph 36; United Nations High Commissioner for Human Rights, September 2023. Situation of human rights in Myanmar 2 - Report of the United Nations High Commissioner for Human Rights (A/HRC/54/59). Paragraph 11; United Nations Special Rapporteur on the situation of human rights in Myanmar, 2024. 'Turning tide in Myanmar requires stronger international action as desperate, dangerous junta escalates civilian attacks: UN expert'; and UN Human Rights Council, 2024. Resolution A/HRC/55/L.17. Situation of human rights in Myanmar. Adopted 4 without a vote on 4 April 2024.

[3]Report A/HRC/42/CRP.3, 'The economic interests of the Myanmar military', of the Independent International Fact-Finding Mission on Myanmar; United Nations Special Rapporteur on the situation of human rights in Myanmar, 2022. Conference Room Paper of the Special Rapporteur, Enabling Atrocities: UN Member States' Arms Transfers to the Myanmar Military. 22 February 2022. A/HRC/49/CRP.1; Stockholm International Peace Research Institute, 'SIPRI Arms Transfers Database'.



Airbus is the biggest international shareholder of AviChina.[4] As such, Airbus has significant influence over AviChina's strategic business decisions.

AviChina's most recent annual report (for fiscal year 2022-2023) states that the company "principally operates through its subsidiaries" and that AviChina group is "mainly engaged in the development, manufacture, sales and upgrade of civil aviation products and defense products such as provision of helicopters, trainer aircraft, general-purpose aircraft and regional jets for domestic and overseas customers; and the co-development and manufacture of aviation products with foreign aviation products manufacturers."[5] The group's principal products include the K-8 trainer aircraft and the Y-12 multipurpose aircraft, according to the same annual report.[6] Both aircraft have been commissioned by the Myanmar military since its coup attempt and continue to be frequently documented in use for airstrikes on civilians.[7]

We note that due to the unacceptable risks that AviChina supplies the Myanmar junta with military aircraft and associated arms and material, several Dutch institutional investors have proceeded to altogether exclude AviChina from their portfolios.[8] We also note that the Netherlands continues to play key role in advancing international discussions – including at the United Nations, the European Union and the Organisation for Economic Cooperation and Development – that promote corporate respect for human rights, and corporate accountability for human rights harms.

Moreover, Airbus is taking a risk by providing financial support to a junta arms dealer, as Myanmar has been subject to a European arms embargo. This restriction, renewed in 2018 by the Member States, specifies that it is forbidden for a European entity to:

"Provide financing or financial assistance related to military activities, including in particular grants, loans and export credit insurance for any sale, supply, transfer or export of arms and related materiel, as well as equipment which might be used for internal repression, or for the provision of related technical assistance, brokering and other services directly or indirectly to any person, entity or body in, or for use in Myanmar/Burma"[9].

In other words, by owning shares in AviChina, Airbus could be in violation of the arms embargo, which your government is responsible for implementing.

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[4]AviChina's largest controlling shareholder is AVIC, followed by the Chinese state-owned Tianjin Free Trade Zone Investment and Airbus. AviChina, 2022. Annual Report.

[5]AviChina, 2022. Annual Report.

[6]AviChina, 2022. Annual Report.

[7]Janes, 2021. 'Myanmar Air Force inducts new aircraft'. 17 December 2021 (Y-12); Burma News International, 2023. 'China-Made Y-12 Aircraft Increasingly Deployed by Air Force in Recent Bombing Raids Across Several Combat Zones'. 21 December 2023 (Y12); Burma News International, 2023. 'China-Made Y-12 Aircraft Increasingly Deployed by Air Force in Recent Bombing Raids Across Several Combat Zones'. 21 December 2023 (Y-12); Myanmar Witness. 'Hongdu K-8 Karakorum profile' (K-8); Free Burma Rangers, 27 June 2023 (K-8); Myanmar Witness, 2023. 'Airstrikes and massacres in Pinlaung'. 17 March 2023 (K-8).

[8]See, for example, the exclusion lists of ASR Netherlands (https://www.asrnederland.nl/-/media/files/asrnederland nl/duurzaam-ondernemen/duurzame-belegger/duurzaam-beleggingsbeleid/overview-excluded-companies.pdf); Heineken Pensioenfunds (https://heinekenpensioenfonds.nl/wp-content/uploads/2024/03/240229-Exclusion-list-2024_companies.pdf); Achmea (https://www.achmea.nl/-/media/achmea/documenten/duurzaamheid/documentatie-mvb/overzichten/uitsluitingslijst beleggen.pdf); ING CDC Pensioenfonds (https://ing.cdcpensioen.nl/uploads/files/ing/informatie/beleggen/ING_CDC_Restricted List_jan18.pdf) and KLMvliegendfond (https://klmvliegendfonds.nl/sites/klmvliegendfonds.nl/files/2023 12/Uitsluitingenlijst%20Q3%202023%20PFV.pdf). atie/beleggen/ING_CDC_RestrictedList_jan18.pdf) and KLMvliegendfond (https://klmvliegendfonds.nl/sites/klmvliegendfonds.nl/files/2023 12/Uitsluitingenlijst%20Q3%202023%20PFV.pdf).

[9]Council of the European Union Decision 2013/184/CFSP, https://eur-lex.europa.eu/legalcontent/EN/TXT/HTML/?uri=CELEX%3A32013D0184



Airbus is legally domiciled in your country. Because of this fact alone, and in light of your commitments to advance business respect for human rights, we consider that your Government has a particularly important role to play in ensuring that Airbus assumes its responsibility to respect human rights across its entire value chain.

We, the undersigned organisations, urge your Governments to take meaningful and concrete action to block the Myanmar military junta's access to military aircraft, spare parts and related maintenance, repair and overhaul services which continue to be provided to the junta by AVIC subsidiaries and partners.

We specifically ask you to:

1) Ensure that Airbus acts in accordance with its human rights responsibilities by using its leverage to stop AVIC's business with the Myanmar military.

2) Ensure that Airbus takes steps to divest from AviChina and end its business relationship with AVIC if transfers of AVIC aircraft, associated equipment and support to Myanmar continue.

Sincerely,
361 international and local revolutionary groups, and civil society organisations

For more information, please contact:

Blood Money Campaign, ***bloodmoneycampaign21@protonmail.com***

A total of 361 organisations, including 73 groups that can't be named because of security reasons, have signed this letter.



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1. 5/ of Zaya State Strike
2. Action Against Myanmar Military Coup (Sydney)
3. Action Committee for Democracy Development (ACDD)
4. Action Committee of Basic Education Students (ACBES)
5. Ah Nah Podcast - Conversations with Myanmar
6. All Arakan Youth Organizations Network (AAYON)
7. All Aung Myay Thar San Schools Strike Force
8. All Burma Federation of Student Unions (Monywa District)
9. All Burma Student Democratic Front (ABSDF) - Australia Branch
10. All Young Burmese League (AYBL)
11. Alliance for Democracy for Myanmar
12. Alliance of Students' Union – Yangon (ASU-Yangon)
13. ALTSEAN-Burma
14. Anti Dictatorship in Burma DMVPA Area
15. Anti-Junta Alliance Yangon-AJAY
16. Anti-junta Forces Coordination Committee (AFCC -Mandalay)
17. Anyar Taw Eain
18. Arakan CSO Network
19. Arakan Rohingya Development Association - Australia
20. Arakan Youth Peace Network (AYPN)
21. Athan - Freedom of Expression Activist organization
22. Aung San Suu Kyi Park Norway
23. Australian Burmese Rohingya Organisation (ABRO)
24. Australian Coalition for Democratic Burma (ACDB)
25. Australian Karen Organisation (AKO)
26. AWDO (Magway Region)
27. A-Yar-Taw People Strike
28. Basic Education General Strike Committee (BEGSC)
29. Basic Education Worker Unions - Steering Committee (BEWU-SC)
30. Basic Education Worker`s Union (Bago)
31. Blood Money Campaign (BMC)



32. Board Of Education (Bago)
33. Boston Free Burma
34. Burma Campaign UK
35. Burma Human Rights Network (BHRN)
36. Burmese Canadian Network (BCN)
37. Burmese Community Development Collaboration (BCDC)
38. Burmese Community Support Grop (BCSG)
39. Burmese Medical Association Australia (BMAA)
40. Burmese Rohingya Association in Japan (BRAJ)
41. Burmese Rohingya Community in Denmark (BRCD)
42. Burmese Rohingya Community of Georgia, Atlanta
43. Burmese Rohingya Organisation UK (BROUK)
44. Burmese Rohingya Welfare Organization New Zealand (BRWO) NZ
45. Burmese Women's Union -BWU
46. Campaign for a New Myanmar
47. CAN-Myanmar
48. CDM Medical Network (CDMMN)
49. Chanmyatharzi Township People's Strike
50. Chaung Oo Township Youth Strike Committee
51. Chin Community in Norway
52. Chin Social Association (Mae Sot)
53. Chindwin (West) Villages Women Strike
54. Civil Information Network (CIN)
55. Civil Society Organizations Coordination Committee (Monywa)
56. Coalition Strike Committee – Dawei
57. Co-operative University Mandalay Students' Strike
58. Coordination Team for Emergency Relief-Karenni (CTER)
59. CRPH & NUG Supporters Ireland
60. CRPH Funding Ireland
61. CRPH Support Group, Norway
62. CRPH, NUG Support Team Germany - Deutschland
63. Daung Sitthe Strike
64. Dawei (Ashaetaw) Women Strike
65. Dawei Youths Revolutionary Movement Strike Committee
66. Defend Myanmar Democracy
67. Democracy, Peace and Women's Organization
68. Democratic Party for a New Society, Norway
69. Democratic Youth Council
70. Depayin Township Revolution Steering Committee
71. Depayin Women Strike
72. EarthRights International



73. Enemy Air Route (EAR)
74. Equality Myanmar (EQMM)
75. Ethnic Youth General Strike Committee (Mandalay)
76. ETOs Watch Coalition
77. European Rohingya Council (ERC)
78. Federal School
79. Former ABSDF
80. Former Political Prisoners and New Generation Group – Monywa
81. Free Rohingya Coalition
82. Freedom and Labor Action Group (FLAG)
83. Friends Against Dictatorship (FAD)
84. Future Thanlwin (FT)
85. Gangaw Women Strike
86. General Strike Collaboration Committee (GSCC)
87. General Strike Committee of Basic and Higher Education (GSCBHE)
88. General Strike Coordination Body (GSCB)
89. Generation Network Myanmar
90. Generation Wave
91. Generations' Solidarity Coalition of Nationalities (GSCN)
92. Global Action Against China's Meddling in Myanmar (GAACMM)
93. Global Myanmar Spring Revolution (GMSR)
94. Global Shan Network (GSN)
95. GMSR Korea 글로벌 미얀마 봄혁명 연대 -တကမ္ဘာလုံးဆိုင်ရာ မြန်မာ့နွေဦးတော်လှန်ရေး
96. HTY Scout Channel
97. Human Rights Foundation of Monland
98. India for Myanmar
99. Industrial Training Centre (ITC) Family Sydney
100. Industries Strike
101. Info Birmanie
102. Information & Scout News (Hlaing)
103. Inter - Religious Institute for Peace (IRIP)
104. Interim Myanma Railways Administration Council (IMRAC)
105. International Campaign for the Rohingya
106. Japan Myanmar Help Network (JMHN) – comprising of over 40 youth groups in Japan
107. Justice & Equality Focus (JEF)
108. Justice For Myanmar (JFM)
109. Justice Movement for Community-Innlay
110. Kachin Association Australia (KAA)
111. Kachin Association Norway
112. Kachin Peace Network



113. Kachin Student Union
114. Kalay Township Strike Force
115. Kalay Women Strike
116. Kamayut Scout Channel
117. Karen Human Rights Group (KHRG)
118. Karen Peace Support Network (KPSN)
119. Karenni Human Rights Group (KnHRG)
120. Karenni National Women's Organization (KNWO)
121. KayahLi Phu Youth-KLY
122. Kayan New Generation Youth (KNGY)
123. Kayaw Women Association
124. K'cho Ethnic Association (Europe)
125. Keng Tung Youth
126. Kyae Lak Myay
127. Kyae Lak Myay
128. Kyain Seikgyi Spring Revolution Leading Committee
129. Kyauktada Strike Committee (KSC)
130. Land In Our Hands - ဒို့မြေကွန်ရက်
131. Latpadaung Region Strike Committee
132. Legal Aid for Human Rights
133. Let's Help Each Other (LHEO) - အလုပ်သမား အချင်းချင်းရိုင်းပင်း ကူညီရေးအဖွဲ့
134. LGBT Alliance
135. LGBT Alliance Myanmar (Kalay Region)
136. LGBT Alliance Myanmar (Kyaukse Region)
137. LGBT Community Yangon
138. LGBT Union – Mandalay
139. Madaya Federal School
140. Magway People's Revolution Committee (မကွေးလူထု တိုက်ပွဲကော်မတီ)
141. Maharaungmyay Township People's Strike
142. Mandalar University Students' Strike
143. Mandalay Alliance Coalition Strike
144. Mandalay Medical Family (MFM)
145. Mandalay Strike Force (MSF)
146. Mandalay Women Strike
147. Mandalay Youth Strike
148. Mandalay-based People's Strike
149. Mandalay-Based University Students' Unions (MDY_SUs)
150. MATA စစ်ကိုင်းတိုင်း
151. Matu Chin Community - NSW/UPU Chin Association
152. Mayangone News
153. MayMyo Strike Force



154. Milk Team Alliance Thailand (MTAT)
155. MilkTeaAlliance Calendar Team
156. Mindat Chin Community NSW
157. Minority Affairs Institute (MAI Myanmar)
158. Mon National Council (MNC)
159. Mon State Development Center (MSDC)
160. Monywa LGBT Strike
161. Monywa People's Strike Steering Committee
162. Monywa Women Strike
163. Monywa-Amyint Road Strike Leading Committee
164. Monywa-Amyint Road Women Strike
165. Multi-Religions Strike
166. Mya Taung Strike
167. Myanmar Campaign Network
168. Myanmar Catholic Community in Norway
169. Myanmar Community Coffs Harbour (MCC)
170. Myanmar Community in Norway
171. Myanmar Democratic Force (Denmark)
172. Myanmar Engineering Association of Australia (MEAA)
173. Myanmar Ethnic Rohingya Human Rights Organization in Malaysia (MERHROM)
174. Myanmar Federal Democratic Mission Collection (MFDMC)
175. Myanmar Global Support Foundation - MGSF
176. Myanmar Hindu Union
177. Myanmar Institute of Information Technology Students' Strike
178. Myanmar Labor Alliance (MLA)
179. Myanmar Professionals Association Australia (MPAA)
180. Myanmar Student Union (တကသမျှးအဖွဲ့ချုပ်)
181. Myanmar Students' Association Australia (MSAA) NSW Chapter
182. Myanmar Tourism Committee (MTC)
183. Myaung Youth Network
184. MyaYar Knowledge Tree
185. Myingyan Civillian Movement Committee
186. National League for Democracy (Monywa Township)
187. Nattalin Board of Education
188. Network for Human Rights Documentation ND-Burma
189. Network of University Student Unions – Monywa
190. New Myanmar Foundation
191. New Power Generation
192. New Step
193. NLD Organization Committee (International) Norway
194. NLD Solidarity Association (NSW chapter)



195. No Business With Genocide
196. No.12 Basic Education Branch High School (Maharaungmyay) Students' Union
197. NOK Information & Scout Echo
198. North Dagon & East Dagon News
199. Norway Falam Community
200. Norway Matu Community
201. Norway Rvwang Community
202. NSW Karenni (Kayah) Communities
203. Nway Oo Guru Lay Myar (ဇနွဦးဂုရုလေးများ)
204. Nyan Lynn Thit Analytica
205. OCTOPUS (Youth Organization)
206. Oway Institute
207. Pakkoku Youth Development Council (PYDC)
208. Pakkoku Youth Network
209. Pale Township People's Strike Steering Committee
210. People Defense and Supporting Force (PDSF)
211. People's Embrace
212. Peoples of Longing
213. Political Prisoners Network Myanmar (PPNM)
214. Progressive Muslim Youth Association (PMYA)
215. Progressive Voice
216. Purple Window Counselling
217. Pyi Gyi Tagon Strike Force
218. Queers of Burma Alternative (QBA)
219. Representative Committee of University Teacher Associations (RC of UTAs)
220. Revolution Through Art (RTA)
221. Rise Again Myanmar (RAM)
222. Rohingya Association of Canada (RAC)
223. Rohingya Community in Norway
224. Rohingya Human Rights Initiative
225. Rohingya Maìyafuìnor Collaborative Network (RMCN)
226. Rohingya Organisation Norway (RON)
227. Samgha Sammaga-Mandalay
228. Save and Care Organization for Ethnic Women at Border Areas (SCOEWBA)
229. Save Myanmar San Francisco
230. Save Myanmar USA
231. Sein Pann Strike Column
232. Seinpann Strike
233. Shan MATA
234. Shwe Pan Kone People`s Strike Steering Committee
235. Sisters2Sisters



236. Sitt Nyein Pann Foundation
237. South Dagon Scouting Infos (SDG)
238. Southern Dragon Myanmar
239. Southern Youth Development Organization
240. Spring Revolution Myanmar Muslim Community
241. Support Group for Democracy in Myanmar (NL)
242. Support Group for Democracy in Myanmar (The Netherlands)
243. Sydney Friends for Myanmar Unity
244. Sydney Peace & Justice Coalition
245. SYSO, Seoul
246. Tai Pin Phaw online counseling Service
247. Tamwe Nway Oo Channel
248. Taze Strike Commitee
249. Taze Women Strike
250. Technological Teachers' Federation (TTF)
251. Thaketa & Dawbon Scout Channel
252. Thakhin Kodaw Mhine Peace Network (Monywa)
253. Thayat Chaung Women Strike
254. The 88 Generation Peace and Open Society (Monywa)
255. The Mekong Butterfly
256. Thint Myat Lo Thu Myar Organization
257. TPN-SBO - သဖြေညီရွှေဘိုပန်း
258. Twitter Team for Revolution (TTFR)
259. University Students' Unions Alumni Force
260. Volunteers in Myanmar
261. We Pledge CDM (Australia)
262. Wetlet Revolution Leading Committee
263. Wetlet Twonship Women Strike
264. White Coat Society Yangon (WCSY)
265. Women Activists Myanmar (WAM)
266. Women Alliance Burma (WAB)
267. Women's Organization of Political Prisoners (WOPP)
268. Yadanabon University Students' Union (YDNBUSU)
269. Yangon Deaf Group
270. Yangon Women Strike
271. Yasakyo Township People`s Strike Steering Committee
272. Yinmarpin and Salingyi All Villages Strike Committee
273. Youth for Democratization of Myanmar (YDM)
274. Youth Heart Beams
275. Youth Scout For Democracy (YSD)
276. Zomi Association Australia Inc.



277. Zomi Christian Fellowship of Norway
278. Zomi Community Norway
279. ကြာအင်းဆိပ်ကြီးသပိတ်အင်အားစု/ကရင်
280. ပြင်သစ်နိုင်ငံရောက် မြန်မာများအသင်း
281. ပြည်သူ့သပိတ်အင်အားစု
282. ပုလဲလူထုသပိတ် တိုက်ပွဲဦးဆောင်ကော်မတီ
283. မျိုးဆက်-Generations
284. မြန်မာမွတ်စလင်အစည်းအရုံး (BMA)
285. ယိမ်းနွဲ့ပါး
286. ဝေါမြို့နယ်ပညာရေးဘုတ်အဖွဲ့
287. သမိုင်းသယ်ဆောင်သူများ
288. အညာလွင်ပြင်ရပ်ဝန်း

