

OVERVIEW

Conflict and political instability in Rakhine state have significantly hindered humanitarian access for both the affected populations and the organisations striving to provide assistance. Factors severely restricting aid workers' movement towards communities in need include the region's complex security environment, with the presence of multiple armed factions (including conflict between the Tatmadaw, the armed forces of Myanmar, and the Arakan Army or AA); administrative barriers; and challenging terrain (ICG 27/08/2024; AWSO accessed 25/10/2024; ACAPS 05/08/2024; UNHRC 20/03/2024; GCR2P 21/08/2024). In Rakhine, these constraints prevent many people from receiving essential services, intensifying their suffering (IRC 19/09/2024; ICG 27/08/2024; OCHA 03/03/2024).

In the mid-2024 Conflict Index of the Armed Conflict Location & Event Data (ACLED) project, Myanmar ranked as the third deadliest and fourth most perilous country for civilians globally (ACLED 06/08/2024). Needs across the country have significantly increased, with an estimated 18.6 million people requiring assistance throughout 2024 compared to one million in 2020 (OCHA 18/12/2023). The escalating armed conflict has also resulted in significant displacement. By 17 October, nearly 3.2 million people had been displaced since February 2021, 232,800 in Rakhine state alone (UNHCR 01/10/2024).

According to the UN, since the February 2021 coup, the Tatmadaw has been involved in a systematic denial of humanitarian relief to people in need (UNHRC 20/03/2024). There have been significant regional disparities in assistance, with the military withholding aid from areas under the control of armed resistance groups, such as the AA in Rakhine (THET 01/02/2024).

The increasing insecurity and strict military regulations have led many aid organisations to reduce their operations (TNH 06/12/2023; UNHRC 16/09/2021). One major factor involves the attacks on aid workers throughout Myanmar, with notable surges in several states (including Rakhine) following the 2021 coup. Out of the 186 such attacks documented since 2011, nearly 90% occurred between 2021–2024 (AWSO accessed 25/10/2024).

About the report

Aim: this report highlights the challenges surrounding aid delivery for humanitarian organisations and access to that aid for people in need. It aims to inform humanitarian responders, donors, and decision makers about the access constraints affecting their operations, staff, and the communities they serve.

Methodology: the findings are based on a review of secondary data and, with most responders reporting remotely outside the country, five INGO and NGO key informant interviews with humanitarian responders in Myanmar and neighbouring states.

Limitations: the conflict has resulted in significant information gaps, making it difficult for cluster teams to conduct thorough assessments. As a result, reported figures may underestimate the actual situation. To address these gaps and reduce the reliance on speculative information, this report cross-references multiple primary and secondary sources and clearly indicates where information remains unverified or speculative.

KEY MESSAGES

- **Escalating conflict and deteriorating humanitarian conditions:** the conflict and political instability in Myanmar have severely limited humanitarian access, particularly in Rakhine state. Movement restrictions, coupled with a complex security landscape, hinder the delivery of essential aid and services, with increasing numbers of people facing displacement, food insecurity, limited healthcare access, and protection risks. At the same time, the conflict has further isolated communities, aggravating their needs and hindering assistance.
- **Restricted humanitarian access and funding shortages:** the complex security landscape, coupled with administrative hurdles and movement restrictions, has severely hampered humanitarian access. This has limited the ability of aid organisations to reach in need populations and deliver critical assistance. Despite the urgency of needs, the 2024 Myanmar Humanitarian Response Plan remains significantly underfunded, hindering efforts to address the crisis. The limited funding has forced humanitarian organisations to prioritise essential needs and reduce the scope of their operations.

- **Localisation and adaptation:** humanitarian organisations have increasingly relied on community-based groups to deliver aid in Myanmar. These grassroots organisations, with their deep-rooted connections and understanding of the complex context, are better equipped to navigate the challenges and reach populations in need. That said, they face significant constraints, including insecurity and limited resources and capacity.
- **Operational challenges and innovation:** the challenging operating environment in Myanmar has forced humanitarian organisations to adapt their strategies and innovate their approaches.
- **Navigating legal and regulatory hurdles:** organisations have had to find creative ways to operate within the restrictive legal framework.
- **Leveraging technology:** the use of satellite internet and other technological solutions has helped in overcoming communication challenges.
- **Adapting financial mechanisms:** the reliance on informal financial systems, such as Hundi, has become necessary to overcome banking restrictions and ensure the timely delivery of aid.

BACKGROUND: RAKHINE STATE POST-COUP

Before the 2021 military coup, Rakhine state was already grappling with significant challenges, primarily marked by ethnic and religious tensions and political instability. The state is home to the majority Rakhine Buddhists and the Rohingya Muslim minority, with the latter facing severe discrimination and exclusion from citizenship under Myanmar's 1982 nationality law. Periodic outbreaks of violence, including the 2012 communal riots that displaced thousands, have aggravated this division (ICG 28/08/2020; TNI 18/12/2019).

The situation in Rakhine worsened significantly in 2017 when Myanmar's military launched a brutal crackdown on the Rohingya, following insurgent attacks on security forces by a Rohingya militant group. The operation, widely described as ethnic cleansing, led to the mass displacement of over 700,000 Rohingya refugees to neighbouring Bangladesh (AI 21/11/2017; HPN 24/10/2018).

The region has also suffered from underdevelopment and poor infrastructure, with much of the population living in poverty. While there have been efforts for peace and reconciliation, including initiatives from the UN and the Myanmar Government, deep-rooted tensions remain unresolved. In the lead-up to the 2021 coup, Rakhine continued to experience instability, with sporadic clashes between the military and ethnic armed organisations (EAOs), leaving the population vulnerable to further displacement and suffering (Nguyen 05/2018; CDA 04/2017; HRW 08/10/2020).

Following the 2021 coup, the state experienced a period of relative stability as major conflicts between the Tatmadaw and various EAOs shifted to other regions, such as Sagaing and Shan states. During this time, the AA and the Tatmadaw, under the authority of the State Administration Council (SAC) – the military-led governing body that assumed power in Myanmar following the coup – upheld a ceasefire. The AA maintained control over rural areas in the central and northern parts of the state, while the military primarily remained stationed in urban areas and military bases (ICG 27/08/2024; HRW 09/02/2024).

Timeline of key developments

- In November 2023, this ceasefire ended after the AA launched attacks on military positions across the state, aiming to establish an autonomous region for over a million people along the Myanmar–Bangladesh border (HRW 09/02/2024; ICG 27/08/2024; GCR2P 22/08/2024).
- In response, the military conducted indiscriminate air strikes on areas under AA control in northern and central Rakhine, targeting non-military infrastructure, such as hospitals and markets, and imposing a physical blockade on the state (ICG 27/08/2024; HRW 12/08/2024). Despite these challenges, the AA, primarily with the support of the Rakhine Buddhist majority, has expanded its operations into northern Rakhine, where reports indicate attacks on Rohingya civilians as a result of their opposition to the AA (ICG 27/08/2024).
- Until May 2024, the AA controlled nine townships in central and northern Rakhine, as well as as much of the Bangladesh border (ICG 27/08/2024).
- By August, the AA controlled the most extensive territory in Myanmar held by a non-state armed group, both in terms of land area and population. It was on the brink of securing nearly all of Rakhine state (ICG 27/08/2024).
- To maintain control over the Myanmar–Bangladesh border, the military has conscripted Rohingya individuals and formed alliances with the Arakan Rohingya Salvation Army (ARSA), a militant group seeking to protect the rights of the Rohingya Muslim minority (USIP 17/08/2018). This collaboration aims to counter AA advances, particularly in northern Rakhine (ICG 27/08/2024; Frontier 04/04/2024). ARSA's retaliation has been a major catalyst for the current conflict in Rakhine state, heightening tensions between the Rohingya community and the Tatmadaw. The group's tactics and objectives remain a subject of debate; some consider it a legitimate resistance movement, while others label it a terrorist organisation (ICG 27/08/2024; USIP 17/08/2018).
- The escalations since November 2023 have resulted in the isolation of Buthidaung, Maungdaw, and Rathedaung townships in northern Rakhine and the capital, Sittwe, from the rest of the state, severely restricting people's access to essential supplies, such as food and medicine (ICG 27/08/2024; MSF 15/04/2024).

- Hostilities and insecurity remain the most significant barriers to humanitarian access in the region. At the same time, a lack of electricity and internet connectivity, the loss of essential services, and the conflict's destruction of the economy severely constrain access for both affected people and humanitarian organisations (OCHA 27/09/2024).

ACCESS OF PEOPLE IN NEED TO HUMANITARIAN AID

Access to essential services has become increasingly challenging for those in need since the coup. Insecurity, military blockades, and rising transportation costs significantly hinder individuals' ability to receive aid and access necessary services (TNH 09/10/2024).

The Rohingya in Rakhine face a deteriorating humanitarian crisis alongside rising levels of insecurity, forced conscription into the Tatmadaw, movement restrictions, and clashes between Rohingya communities (USIP 08/05/2024; KII 28/10/2024). Although numbers are very difficult to verify, September 2024 estimates point to 600,000 Rohingya, including 470,000 non-displaced individuals and 125,000 IDPs, requiring humanitarian assistance in the state (IRC 19/09/2024).

The escalating violence since October 2023 has further isolated townships such as Buthidaung, Maungdaw, and Rathedaung, severely restricting access to essential supplies and aid (IRC 19/09/2024; ICG 27/08/2024). Around 125,000 Rohingya also reside in confined camps in central Rakhine state, facing severe restrictions and relying on aid groups for basic services (TNH 09/10/2024). In northern Rakhine, the presence of ARSA and the Rohingya Solidarity Organisation, an EAO advocating Rohingya rights in Rakhine, poses daily protection risks to refugees, including extortion, abduction, and insecurity stemming from rampant drug and human trafficking (USIP 08/05/2024). Many conflict-affected communities in northern Rakhine have sought refuge in camps in Sittwe, but among the Rohingya, only those possessing a national registration card – whether issued prior to or following the revocation of their citizenship – have access to the state capital (MSF 10/09/2024).

Members of ethnic minority groups, including the Rohingya, face significant movement restrictions from both armed groups and the Tatmadaw. These restrictions, which include checkpoints and roadblocks, hinder access to essential services for those in need (KII 28/10/2024). In Sittwe, the Tatmadaw residents are prohibited from travelling to other townships, while recently displaced individuals residing in monasteries face severe movement restrictions imposed by the Tatmadaw, further limiting their access to services (KII 31/10/2024; Danish Immigration Service 15/08/2024).

In August 2024, the AA conducted raids on Rohingya villages in southern Buthidaung township, which seemed intended to intimidate and coerce community members into supporting the AA or deter potential opposition. Following this, the group imposed a strict curfew across

northern Maungdaw township on 2 October, restricting movement from 19:00–6:00 in villages such as Kyauk Hle Kha, Minglalar Gyi, Oo Shay Kya, and Thayet Oak (BROUK 17/10/2024; The Diplomat 08/10/2024). This has affected the community's access to services.

Food security and livelihoods

In 2023, Rakhine ranked as the most vulnerable state across the country, with drivers including movement restrictions, limited market supplies, and rising prices leading to severe food shortages (UNDP 15/12/2023). Approximately 13.3 million people in Myanmar were projected to experience high acute food insecurity levels between June–August 2024, with northern Rakhine state being particularly affected (OCHA 09/06/2024).

The weakening of the Tatmadaw in Rakhine by the AA has prompted the Tatmadaw to shift from ground operations to air raids. This shift has primarily targeted markets and residential areas, aimed at ethnic Rakhine individuals perceived to support the AA. As a result, many people are avoiding markets, leading to difficulties in accessing food and supplies (AJ 04/10/2024).

Movement restrictions further aggravate these challenges, affecting both farmers' and traders' ability to transport their produce to markets and consumers' ability to access essential goods (UNDP 15/12/2023). By 7 October, food prices had risen by 148% over the past year (MIMU 14/10/2024; BNI 15/08/2024). The rise in food prices is likely to compel people to reduce the quantity and quality of their food intake as a coping mechanism.

Bank closures have significantly limited access to formal credit and microfinance. This restricts farmers' ability to purchase agricultural inputs or invest in new equipment to improve productivity, often forcing them to resort to informal money lenders who charge exorbitant interest rates (UNDP 15/12/2023). This situation has compelled farmers to cultivate less land and limit the population's access to cash for food and other essential items, decreasing overall production and worsening food shortages.

Since the escalation of violence in November 2023, the Tatmadaw and the AA have closed rivers and waterways in the areas they control. In central Rakhine, the Tatmadaw has fenced off the coastline and mined the beach to prevent potential AA attacks from the sea (KII 31/10/2024; KII 28/10/2024). Fishing boats in northern Rakhine have also faced attacks, abductions, and arrests by the AA. As a result, fisherfolk have lost access to both rivers and the sea, significantly affecting their livelihoods (BNI 03/09/2024; Narinjara 18/09/2024; DT 14/08/2024).

In September 2024, all displaced and affected individuals required food assistance. To cope, some people resorted to strategies with potentially negative outcomes, including depleting savings, borrowing food or money, and reducing non-essential expenditures (KII 31/10/2024; OCHA 27/09/2024).

In 2024, the UN aims to provide support to only 2.3 million of the 12.9 million people in need of food assistance in Myanmar. Although there have been no comprehensive national surveys on malnutrition since the coup, anecdotal evidence indicates a rapid increase in malnutrition rates (UNHRC 20/03/2024).

The Food Security Cluster projects that food insecurity is likely to worsen in the coming months, with the most vulnerable regions, including Rakhine, affecting IDPs and returnees who potentially face unprecedented levels of food insecurity (OCHA 09/06/2024). According to the cluster, if current funding shortfalls persist, it will be compelled to prioritise assistance for the most critically food-insecure populations, such as newly displaced individuals and stateless people in Rakhine. By 5 November, the cluster was only 10% funded (OCHA accessed 05/11/2024).

Healthcare

People face significant challenges in accessing healthcare in Rakhine. Since November 2023, Médecins Sans Frontières (MSF), which operated all 24 sites for mobile clinics in Rakhine, have been unable to run regular healthcare services in the wider areas of central and northern Rakhine. In June 2024, conflict escalation led to the total suspension of healthcare services throughout the state (MSF 27/06/2024 and 10/09/2024).

While access to mobile clinics in Sittwe is relatively unrestricted, the availability of services in central Rakhine varies significantly from township to township (KII 31/10/2024). Patients from Pauktaw township (northern Rakhine), for example, encounter considerable difficulties in reaching Sittwe by sea because of the blockage of waterways. In other towns, conflict limits both healthcare services and access to them, necessitating longer and more strenuous journeys. Consequently, many people have died while seeking medical care or have been unable to attempt the journey because of high transportation costs and logistical constraints. As a result, MSF has observed an alarming increase in maternal and neonatal mortality rates (MSF 10/09/2024).

Attacks on healthcare: the SAC has actively targeted healthcare facilities, including hospitals, severely undermining their ability to provide medical care across the state (RFA 08/03/2021). Between 2016 and September 2024, Rakhine experienced a total of 131 incidents targeting healthcare, including assaults on health infrastructure and personnel. Of these, 125 incidents occurred following the 2021 coup (Insecurity Insight accessed 11/11/2024).

The military has occupied hospitals and converted them into military bases, directly contravening international humanitarian norms. Military personnel have also subjected healthcare workers to arbitrary beatings and arrests while on duty (The Irrawaddy 01/04/2021; RFA 04/03/2021). Besides direct attacks, the military has conducted raids on private clinics and charitable organisations, seizing medical supplies intended for voluntary medical and

social assistance. It has issued warnings to organisations against providing care to civilian protesters, further restricting people's access to necessary medical services (RFA 08/03/2021; CNN 08/03/2021; Myanmar NOW 24/11/2021).

Protection

In Rakhine state, landmines and other unexploded ordnance remain a significant threat, particularly in conflict-affected townships. These hazardous devices complicate efforts to provide aid and limit the safe movement of people. As conflict intensifies, the presence of unexploded ordnance in both rural and urban areas severely impedes agricultural activities, restricts access to vital resources, and further destabilises already vulnerable communities such as women and children.

Reports of civilian casualties, arrests, and detentions for alleged affiliation with conflict parties are also prevalent. These actions are often based on perceived associations with either the Tatmadaw or the AA (OCHA 03/03/2024). The escalating conflict is heightening concerns about forced recruitment, particularly among vulnerable Rohingya populations. Reports of both the Tatmadaw and Rohingya Solidarity Organisation forcibly recruiting young Rohingya in Buthidaung, Kyaukphyu, and Sittwe townships have emerged, potentially intensifying intercommunal tensions in Rakhine state. Fear of forced recruitment is driving displacement, with the conscription law's impact on the availability of young humanitarian workers being a significant concern. Since November 2023, arbitrary arrests have continued across the state, with over 1,400 people detained for alleged affiliation with either side of the conflict (AJ 04/10/2024; OCHA 05/04/2024).

Human trafficking also remains a critical issue, with many people – especially women and children – fleeing violence and seeking refuge in neighbouring countries, only to face further exploitation (HRW accessed 14/11/2024; UN Women 29/12/2022).

Illegal movements across borders by the Rohingya are becoming increasingly common as they attempt to escape the conflict into Bangladesh, often resulting in dangerous journeys and vulnerable conditions that expose them to trafficking, arrest, or detention. Between 1 January and 31 October 2022, analysis from the Center for Operational Analysis and Research tracked reports of 1,967 Rohingya people arrested within Myanmar and 41 in Thailand (COAR 28/03/2023).

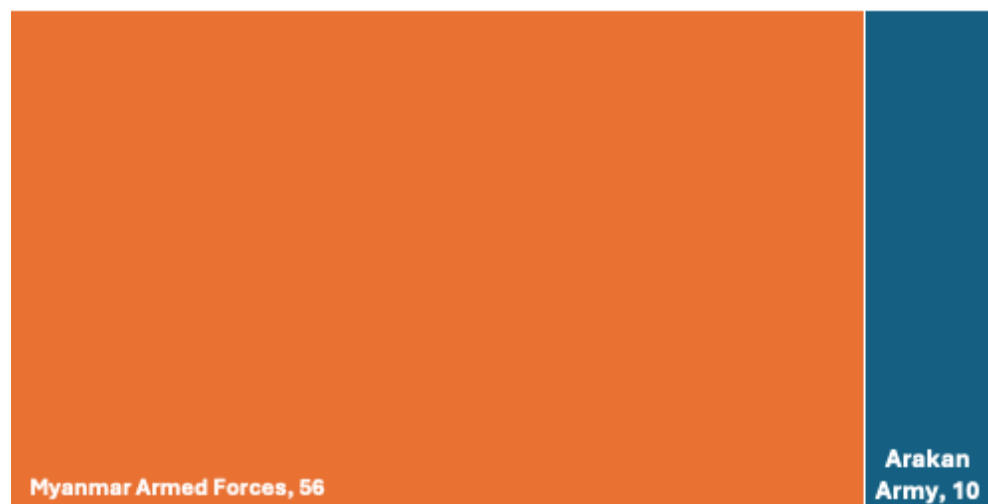
The loss of important documentation, such as land and housing records, has also become a critical issue for displaced communities in Rakhine. The destruction of homes and the displacement of large numbers of people are likely to result in the loss of proof of ownership, complicating the process of returning to their homes or claiming land and property rights. This documentation loss has long-term implications, as it is a barrier to future stability and recovery (KII 28/10/2024; HRW 17/07/2018).

Education

Conflict escalations have endangered teachers, schools, and universities, drawing educational institutions into the turmoil and affecting numerous students. Even with schools remaining open in areas under SAC control, they face significant challenges, including a shortage of teachers and restrictions on the entry of goods limiting the availability of school supplies. Consequently, until October, humanitarian organisations were able to provide only informal education outside the normal curriculum (KII 31/10/2024).

Between 1 January 2020 and 27 August 2024, there have been around 1,200 incidents affecting education, including attacks on education infrastructure, students, and teachers. Of these, at least 13% were recorded in Rakhine state (Insecurity Insight accessed 17/10/2024). This has resulted in learning disruptions, the displacement of students and teachers, and the destruction of educational facilities. As a result, many children may never return to school, exposing them to exploitation risks, such as child labour and early marriages. The disruption not only limits their immediate learning opportunities but also undermines long-term development, increasing the risk of perpetuating cycles of poverty.

Figure 1. Attacks on education, by perpetrator, between January 2020 and August 2024



Source: Insecurity Insight (accessed 17/10/2024)

HUMANITARIAN ACCESS CONSTRAINTS

Hostilities and insecurity continue to be the main obstacles to humanitarian access in Rakhine state. Between 2020 and September 2024, 44 of the 138 reported attacks in Myanmar occurred in Rakhine (OCHA accessed 29/10/2024).

Movement restrictions imposed by both the military and the AA, coupled with the closure of roads and waterways, have severely limited access to the region. Air transport remains the only viable option, significantly increasing the cost and time required for aid delivery (KII 28/10/2024; CSIS 29/11/2023). Because of the escalating conflict and severe restrictions on humanitarian access in central and northern Rakhine state since November 2023, several organisations, including Lutheran World Federation and MSF, have been compelled to suspend medical assistance in northern Rakhine state (MSF 27/06/2024; SCR 02/07/2024).

ACLED's six-month forecast to December 2024 predicts at least 152 political violence events in Rakhine (ACLED 06/08/2024). This is likely to further curtail the humanitarian response in the state.

Bureaucratic and administrative impediments

Decades of military rule in Myanmar, along with conflict and tensions with democratic opposition groups, including EAOs – persisting even during the brief period of the democratically elected National League for Democracy Government – have made Myanmar a longstanding access-constrained environment for humanitarian aid (AJ 01/02/2021; ICG 16/02/2021). According to humanitarian organisations, the coup has significantly increased these obstacles (AJ 01/02/2021).

In October 2022, the SAC enacted the Organization Registration Law (ORL), which replaced the Association Registration Law of 2014. The ORL has significantly hindered the operations of humanitarian organisations in the country (CLD 08/2023). This law imposes strict registration requirements on both national and international NGOs, carrying penalties for non-compliance. Many national organisations are reluctant or unable to register, fearing potential risks and allegations of supporting the military, which would affect their operations in EAO-controlled areas such as northern Rakhine (KII 23/10/2024). The requirement to disclose funding sources, operational locations, and other sensitive information has also created significant operational difficulties. The consequences of operating without registration include financial penalties and potential imprisonment, and partnerships with unregistered organisations present additional risks. These conditions have severely threatened the programming presence of numerous organisations in Myanmar, prompting the withdrawal of several international organisations from Rakhine state (CORE 04/2023; Devex 15/02/2023; TNH 06/12/2023; KII 28/10/2024).

Movement restrictions

Bureaucratic restrictions: according to the NGO laws, humanitarian organisations operating in military-controlled areas such as Sittwe and southern Rakhine must secure travel authorisations (TAs) for the movement of staff and supplies, but these requests are often denied. This has resulted in the arrest and detention of aid workers from both INGOs and NGOs who continue to operate without TAs, as well as the seizure of relief supplies, severely disrupting humanitarian operations (OCHA 03/03/2024; KHRG 08/06/2022).

Because of the SAC's designation of the AA as a terrorist organisation, no TAs are issued for townships in central and northern Rakhine, which are primarily under AA control. As a result, many humanitarian organisations have suspended operations in these areas to avoid being mistakenly associated with the AA, which could lead to potential detention and being used as an example by the SAC to deter others from operating without authorisation. In the absence of INGOs, community based responders with TAs remain operational and critical for humanitarian assistance (KII 28/10/2024; KII 31/11/2024).

As the AA strengthens its control over central and northern Rakhine, they have begun requiring humanitarian organisations to submit formal requests for general operation access to the Humanitarian and Development Coordination Office, the group's humanitarian arm. While some national organisations have complied, INGOs have collectively resisted this additional bureaucratic impediment (HRW 05/08/2024; KII 28/10/2024; KII 31/11/2024).

Physical access restrictions: in Sittwe, the Tatmadaw has imposed stringent access restrictions. Despite OCHA's approval of a joint TA request in September 2024, the Tatmadaw has issued only a limited number of TAs, to be shared among INGOs and UN agencies. These TAs have been restrictive, allowing access for only a short period to temporary displacement camps in monasteries and excluding longstanding IDP camps in the town (CNN 23/08/2024; KII 31/11/2024; MSF 12/07/2024). Although some community based organisations can get TAs since they are registered, they usually receive limited access (KII 28/10/2024).

International organisations, to be specific, are facing growing challenges in obtaining and renewing visas for their international staff. As a result, many of these aid workers focused on Myanmar have been stationed outside the country and are using remote project monitoring methods, which are often associated with delayed response times (CORE 04/2023; KHRG 08/06/2022).

Since 13 November, both the AA and Tatmadaw have been blocking most roads and waterways connecting Rakhine state's townships, severely restricting the movement of people and goods within the state (Myanmar NOW 21/12/2023; RFA 20/11/2023).

Restrictions on communications

Since early 2024, the Tatmadaw has taken control of telecommunications services, including internet access, in northern and central Rakhine, significantly hindering humanitarian operations (EngageMedia 05/02/2024; KII 31/10/2024).

From 2021–2023, Myanmar had the second-highest number of internet shutdowns worldwide, totalling 864 days of limited access. In 2023 alone, 20 of the 37 internet shutdowns that occurred globally were in Myanmar (Access Now 12/2023).

Despite the availability of intermittent service from the state-owned telecommunications provider MPT, which is primarily limited to voice calls, connectivity remains severely restricted in Rakhine state. Strict blockades and the control of essential supplies, including fuel, have led to the shutdown of many telecommunications towers, particularly those reliant on diesel generators (Mizzima 21/10/2024; KII 28/10/2024; KII 31/10/2024). Since the first half of 2024, communication outages have been most severe in six townships: Buthidaung, Kyauktaw, Maungdaw, Minbya, Pauktaw, and Ponnagyun. Besides these, Myebon, Mrauk-U, and Rathedaung have experienced frequent disconnections, resulting in sporadic and unreliable communication access. Initially, the disruptions did not severely affect townships such as Ann, Gwa, Kyaukphyu, Munaung, Ramree, Sittwe, Taungup, and Thandwe, but between 12–17 October, all 17 townships of Rakhine experienced a complete shutdown of phone and internet services after the AA attacked border police in Maungdaw township and Tatmadaw in Ann township. The incident has left the entire region without consistent communication access. In Sittwe, Taungup, and Thandwe, limited communication is still available through the state-controlled operator Myanmar Economic Corporation, while some areas have been able to access the internet using Starlink, providing a partial solution to the communication crisis (Mizzima 21/10/2024; Tha Din 03/11/2024).

This disruption in communications has significantly hampered humanitarian organisations' ability to maintain contact with their staff and affiliates, hindering efforts to gather critical information on the needs of affected populations across the state (Rest of World 26/04/2022). Organisations are also concerned about the security of their humanitarian data, fearing potential misuse that could jeopardise the safety of aid recipients, humanitarian personnel, and other stakeholders (Global NPO Coalition on FATF 03/11/2022; CORE 04/2023).

Financial restrictions

Because of the severe restrictions on the entry of goods into Rakhine state and the subsequent shortage of supplies in towns, humanitarian organisations have been compelled to shift their assistance modalities towards cash-based interventions (CORE 04/2023; KII 28/10/2024; KII 31/10/2024).

That said, since February, the banking system in northern and central Rakhine has been inoperative because of SAC restrictions imposed to limit the AA's access to cash. As a result, humanitarian organisations have been forced to rely on informal cash transfer agents, hundis, who charge exorbitant fees. Hundi fees are particularly high in northern Rakhine, where the AA exerts significant control and security risks are elevated. These fees range from 8–15% of the amount transferred. In contrast, fees in central Rakhine, including Sittwe, are lower, ranging from 2–3% in October (KII 28/10/2024; KII 31/10/2024).

The Central Bank of Myanmar's heightened scrutiny of NGO bank accounts and funding sources has resulted in delays or denials of financial transactions. This has compromised the timely delivery of aid and disrupted essential operational activities, such as the payment of staff salaries and suppliers (Global NPO Coalition on FATF 02/2023). Re-registration requirements by the SAC have also meant difficulties for community based NGOs to open bank accounts or access existing accounts as the bank requires them to present new registration certificates (KII 28/10/2024; Global NPO Coalition on FATF 02/2023).

In October 2022, the Financial Action Task Force, an intergovernmental watchdog institution, placed Myanmar on its blacklist as a result of significant deficiencies in addressing money laundering and terrorist financing risks. As a result, international money transfers have become subject to heightened monitoring and restrictions by the global financial system. For aid organisations, this has translated into delays in assistance and operations, including the payment of staff salaries (Global NPO Coalition on FATF 03/11/2022; CORE 04/2023).

Subsequent increase in operation costs

Since the escalation of violence in November 2023, the prices of goods in Rakhine state have skyrocketed. The state-wide blockade has hindered the transportation of supplies from Yangon and ports. Slow clearance processes at ports have also aggravated the shortages of food and other goods in markets (WB 06/2024). These factors have led to substantial price increases, affecting humanitarian organisations' budgets. By October 2024, food prices had surged by at least 143% compared to the same period in 2023. In August 2024 alone, most prices of goods had risen by up to 10%, with the highest rise in prices observed in Sittwe in central Rakhine and Kyaktauw, Maungdaw, Minbya, Mrauk-U, Myebon, Pauktaw, Ponnagyun,

and Rathedaung in northern Rakhine (MIMU 25/09/2024). The time-limited nature of TAs, coupled with lengthy port clearance processes, has also resulted in the expiry of TAs by the time goods are cleared (KII 31/10/2024).

Since February 2024, electricity has been unavailable in Rakhine state. As a result, humanitarian organisations have had to rely on expensive fuel to power their operations. In October 2024, gasoline prices had risen to MMK 21,000 (USD 1.10) per litre in central Rakhine and MMK 16,000 (USD 0.84) per litre in northern Rakhine, significantly higher than the MMK 8,000 (USD 0.42) and MMK 7,000 (USD 0.37) per litre prices in southeastern and northeastern Myanmar, respectively (KII 31/10/2024). In August, the increase in fuel prices also led to a rise in transportation costs, further aggravating the challenges of moving goods to Rakhine (MIMU 21/08/2024).

Underfunding

Since 2022, there has been a shift in donor funding towards the southeastern regions of Myanmar, where escalating conflicts between the Karen National Union and Tatmadaw have led to increased humanitarian needs (Fumagalli 2022). In May 2023, funding for assistance in Rakhine state increased to 92% of the required USD 407 million, up from 45.6% in 2022. This surge in funding was prompted by the devastating impact of Cyclone Mocha, a Category 4 cyclone that made landfall in Sittwe and affected approximately 1.2 million people across all seven districts and 17 townships of the state (WB 29/06/2023; OCHA accessed 09/11/2024; OCHA accessed 11/11/2024). In August 2024, widespread flooding as a result of Super Typhoon Yagi, which affected 69 townships in central, eastern and southeastern Rakhine state, further compounded the situation, necessitating additional resources for humanitarian responders to provide critical assistance (OCHA 10/10/2024 and 30/09/2024).

By 3 November, the 2024 Myanmar Humanitarian Response Plan had received only 32.4% of the required USD 994 million. All sectors, except for Coordination and Support Services, remained significantly underfunded, with Education being the most underfunded sector at only 10% (OCHA accessed 03/11/2024). This significant funding shortfall has severely hampered response efforts. To mitigate the lack of funding, humanitarian organisations have prioritised critical needs, such as food and healthcare, focusing on vulnerable populations, including women, children, and older people (KII 28/10/2024).