



## Myanmar Military Forces Atrocities Against the Rohingya under International Criminal Law

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**Abstract.** The Rohingya, a Muslim ethnic minority group living in northern Rakhine State, Western Myanmar, are considered among the most persecuted minorities in the world. The Rohingya People have been subjected to a variety of significant violations and human rights abuses as a result of their lack of citizenship. They are victims of a series of massacres and inhumane treatment committed by Myanmar military forces, such murder, kidnapping, rape, force labour, torture, extrajudicial executions, restrictions on movements, forced eviction and house and land destruction. In the previous ten years, several crackdowns on the Rohingya people in Rakhine have caused them to flee to neighboring countries. This article examines the atrocities committed by Myanmar military forces against the Rohingya people under international law, notably from the standpoint of international criminal law definition of crimes against humanity.

**Keywords:** Rohingya, Human rights abuses, Crimes against humanity, International Criminal law.

## **Introduction**

In recent years, the media have been fraught with issues of the plight of the Rohingya, a Muslim ethnic minority living in Northern Rakhine State, Western Myanmar. As a minority group living in the Buddhist majority country, the Rohingya people have long been treated unequally by the Government of Myanmar. They have also been subjected to “deepening alienation” and discrimination by the Majority Group. One of the factors for the discrimination and unequal treatment is because the The Government of Myanmar does not recognize them as citizens and has considered them as foreigners and illegal immigrants from Bangladesh.

In 1982, the government of Myanmar issued the 1982 citizenship law. This law has significantly narrowed the Myanmar citizenship categories and removed Rohingya from the official list of 135 national races eligible for full citizenship. Full citizenship is granted under this law largely to members of national races who the state considers to have settled in Myanmar before to 1824, the date of the British occupation. However, according to Myanmar's authorities, there has never been a 'Rohingya' race in Myanmar's history.

As a result of their lack of full citizenship rights, the Rohingya people have faced discrimination and unequal treatment. This in turn leads to human rights violations, abuses, and crimes, leaving the Rohingya people to live in a state of fear and violence.

According to several facts and data documented by Amnesty International, the Rohingya people have been exposed to extreme forms of discrimination, multiple violations and repeated breaches include unlawful killings, physical and sexual violence since 1974 which resulted in the huge number of mass exodus to some neighbour countries.

Furthermore, in a report that has been published by Human Rights Watch, there was evidence of brutal levels of systematic violence in the context of targeted attacks, rapes, tortures, and killings that have been committed by the Myanmar security forces (military Junta) against the Rohingya people.

This violence resulted in the whole and partial destruction of their homes and displacement of a thousands of them. Rohingya men, women, and children were killed, and Some were buried in mass graves. They came to be one of the most persecuted minorities on Earth.

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## **Research Result**

In theory or in practice, discrimination against human beings on the basis of race, color, or ethnic origin cannot be justified anywhere. It also complies with the International Convention on the Elimination of All Forms of Racial Discrimination, which states that all states must take all reasonable steps to prohibit and to eliminate racial discrimination in all of its forms and manifestations, regardless of race, color, national or ethnic origin.

However, the Myanmar government, particularly the security forces do not bear this obligation. Myanmar's de facto leader at the time, Aung San Suu Kyi, also firmly denied that her government had engaged in acts of discrimination that resulted in bloodshed. She dismissed international condemnation of the discrimination and violence.

In fact, a number of international organisations that perform independent studies and research on the Rohingya have recorded evidence of widespread violations and brutality.

One of them was violence that occurred and erupted between October 21 and October 30, 2012. This incident resulted in a potentially serious escalation in several areas of Rakhine State, including the townships of Kyaukpyu, Kyauktaw, Minbya, Mrauk-U, Myebon, Pauktaw, Ramree, and Rathedaung.

Myanmar government officials, local rakhine political party officials, and military officials were all implicated in the Rohingya violence in that episode. According to human rights watch, Prior to the incident, local Arakan political party members and senior Buddhist monks publicly slandered the Rohingya people and characterized them as a threat to Rakhine State.

According to the Al Jazeera news portal, Nearly 5,000 buildings belonging to Rohingya Muslims were demolished. At least 70 Rohingya, including 28 children, were killed in the tragedy in Yan Thei village in Mrauk-U Township. Furthermore, according to the International Crisis Group Asia, 89 people were killed, 136 were injured, and 5,351 homes were destroyed, leaving 32,231 people homeless.

Furthermore, the bloodshed in Myanmar continued. On 9 October 2016, several hundred men attacked three border police posts in Myanmar's northern Rakhine

State. Nine police officers were killed. The government believed that the attackers are from the Rohingya ethnic group. The government immediately deployed Large numbers of soldiers in northern Rakhine state to apprehend the attackers. It was said that more than 100 people were killed in the crackdown. A senior UN official said that the military offensive was a "textbook example of ethnic cleansing."

Moreover, The UN Security Council issued a statement on November 6, 2017 expressing grave concern about reports of human rights abuses and violations, particularly by Myanmar security forces including by the Myanmar security forces, in particular against the Rohingya community, including those involving the systematic use of force and intimidation, killing of men, women, and children, sexual violence, and including the destruction and burning of homes.

### ***Crimes Against Humanity***

Crimes against humanity is one the most serious crimes of concern to the international community. The term 'crimes against humanity' was first used worldwide in a 1915 declaration by the governments of Great Britain, France and Russia, condemning the Turkish government for the suspected massacres of Armenians between 1916 and 1918. The Armenian people were subjected to deportation, expropriation, abduction, torture, massacre, and starvation. A considerable number of Armenians were massacred in a systematic manner, and women and children were kidnapped and abused terribly.

Despite this early use of the term, the first charges of crimes against humanity were brought in 1945 at the International Military Tribunal (IMT) in Nuremberg, Germany, following World War II. On the 8th of August, 1945.

The creation of this tribunal was crucial in the evolution of international criminal law, and it was established to encourage individual accountability and reduce impunity by introducing a legalistic image of a positive international law into the system. In this view, the Nuremberg Tribunal was a watershed moment in legal history, paving the way for a world order founded on the rule of law. Its purpose was to contribute to the advancement of international law.

Article 6 (c) of the Charter establishing the Nuremberg Tribunal defines the crimes against humanity as: murder, extermination, enslavement, deportation, and other inhumane acts committed against any civilian population, before or during the war; or persecutions on political, racial or religious grounds in

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execution of or in connection with any crime within the jurisdiction of the Tribunal, whether or not in violation of the domestic law of the country where perpetrated.

The list of inhumane acts in this article's definition of crimes against humanity is prefaced by a chapeau that specifies the circumstances in which such acts constitute a crime against humanity. According to this article, there are at least four elements that must be sufficiently proven to establish crimes against humanity:

1. Committed against any civilian population,
2. Before or during the war,
3. In execution of or in connection with any crime within the jurisdiction of the tribunal,
4. Whether or not in violation of the domestic law of the country where perpetrated.

As may be seen, the crimes against humanity specified by Article 6, section (c), never considered the element of "widespread or systematic" to be applicable to crimes against humanity. Surprisingly, the international military tribunal of Nuremberg decided to include this section in its decision.

The Nuremberg courts' trial of those responsible for crimes against humanity has proven that there is effective punishment for those responsible for crimes against humanity under international law.

Following that, the International Military Tribunal for the Far East (IMTFE), often known as the Tokyo Tribunal, was founded in January 1946. Douglas McArthur formed this tribunal by proclamation.

In article 5 of the Tokyo Charter of 1946 (Charter of the International Military Tribunal for the Far East), crimes against humanity is defined "murder, extermination, enslavement, deportation, and other inhumane acts committed against any civilian population, before or during the war, or persecutions on political or racial grounds in execution of or in connection with any crime within the jurisdiction of the Tribunal, whether or not in violation of the domestic law of the country where perpetrated. Leaders" organizers, instigators and accomplices participating in the formulation or execution of a common plan or

conspiracy to commit any or' the foregoing crimes are responsible for all 'acts performed by any person in execution of such plan.

The Tokyo Charter and the Charter of the International Military Tribunal of Nuremberg do not differ significantly in their definitions of crimes against humanity.

### ***Crimes Against Humanity in the Rome Statute***

Article 7 of the Rome Statute of the International Criminal Court provides a fairly detailed definition of crimes against humanity. It states:

1. 'crime against humanity' means any of the following acts (actus reus) when committed as part of a "widespread" or "systematic" (mens rea) attack directed against any civilian population, with knowledge of the attack: (a) Murder; (b) Extermination; (c) Enslavement; (d) Deportation or forcible transfer of population; (e) Imprisonment or other severe deprivation of physical liberty in violation of fundamental rules of international law; (f) Torture; (g) Rape, sexual slavery, enforced prostitution, forced pregnancy, enforced sterilization, or any other form of sexual violence of comparable gravity; (h) Persecution against any identifiable group or collectivity on political, racial, national, ethnic, cultural, religious, gender as defined in paragraph 3, or other grounds that are universally recognized as impermissible under international law, in connection with any act referred to in this paragraph or any crime within the jurisdiction of the Court; (i) Enforced disappearance of persons; (j) The crime of apartheid; (k) Other inhumane acts of a similar character intentionally causing great suffering, or serious injury to body or to mental or physical health.
2. For the purpose of paragraph 1: (a) 'Attack directed against any civilian population' means a course of conduct involving the multiple commission of acts referred to in paragraph 1 against any civilian population, pursuant to or in furtherance of a State or organizational policy to commit such attack; (b) 'Extermination' includes the intentional infliction of conditions of life, inter alia the deprivation of access to food and medicine, calculated to bring about the destruction of part of a population; (c) 'Enslavement' means the exercise of any or all of the powers attaching to the right of ownership over a person and includes the exercise of such power in the course of trafficking in persons, in particular women and children; (d) 'Deportation or forcible transfer of

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population' means forced displacement of the persons concerned by expulsion or other coercive acts from the area in which they are lawfully present, without grounds permitted under international law; (e) 'Torture' means the intentional infliction of severe pain or suffering, whether physical or mental, upon a person in the custody or under the control of the accused; except that torture shall not include pain or suffering arising only from, inherent in or incidental to, lawful sanctions; (f) 'Forced pregnancy' means the unlawful confinement of a woman forcibly made pregnant, with the intent of affecting the ethnic composition of any population or carrying out other grave violations of international law. This definition shall not in any way be interpreted as affecting national laws relating to pregnancy; (g) 'Persecution' means the intentional and severe deprivation of fundamental rights contrary to international law by reason of the identity of the group or collectivity; (h) 'The crime of apartheid' means inhumane acts of a character similar to those referred to in paragraph 1, committed in the context of an institutionalized regime of systematic oppression and domination by one racial group over any other racial group or groups and committed with the intention of maintaining that regime; (i) 'Enforced disappearance of persons' means the arrest, detention or abduction of persons by, or with the authorization, support or acquiescence of, a State or a political organization, followed by a refusal to acknowledge that deprivation of freedom or to give information on the fate or whereabouts of those persons, with the intention of removing them from the protection of the law for a prolonged period of time.

3. For the purpose of this Statute, it is understood that the term 'gender' refers to the two sexes, male and female, within the context of society. The term 'gender' does not indicate any meaning different from the above.

***Crimes Against Humanity In Myanmar***

Because not every brutal act qualifies as a "crime against humanity," It is important to prove that the conduct satisfied the elements of a "widespread" or "systematic" attack.

In the case of the Rohingya people in Myanmar, it is critical to examine the situation and determine whether the attacks were widespread or systematic and could be classified as crimes against humanity under international criminal law.

Thus, it is important to begin with re-describing the situation in Myanmar against the Rohingya people, particularly in the Rakhine State. The writer notes that at least three atrocious incidents against Rohingya people happened in Rakhine State between 2012 and 2017.

The scale and intensity of the violations, primarily conducted by Myanmar security forces against Rohingya people in northern Rakhine State, have been unparalleled and extraordinary.

As previously stated, violence occurred and erupted between October 21 and October 30, 2012 in Yan Thei Village, Mrauk-U township, and several other areas of Rakhine State. The Rohingya people were overwhelmingly affected, resulting in numerous deaths and widespread destruction of a predominantly Rohingya Muslim community.

In this episode, the Myanmar security forces did nothing to stop the violence or prevent it from growing. Rather than providing protection and averting the attack, they became personally involved in attacking and burning Rohingya neighborhoods and villages.

In this violence, Rohingya men, women, and children were killed, some were buried in mass graves, and their villages and neighbourhoods were razed. This violence also resulted in the whole and partial destruction of Muslim areas and displacement of a further 36,000 people.

Aljazeera news portal reported that almost 5,000 buildings owned by Muslim Rohingya were destroyed. At least 70 Rohingya, including 28 children were killed in a massacre in Yan Thei village in Mrauk-U Township. The International Crisis Group Asia also published a report stating that 89 people were killed, 136 wounded, and 5,351 homes burned down, making 32,231 people homeless.

Moreover, On October 9, 2016, several hundred men attacked three border police checkpoints in Myanmar's northern Rakhine State. The incident resulted in the deaths of nine police officers. According to police, the attackers are believed to be Rohingya Muslims. The government quickly sent significant numbers of soldiers in northern Rakhine state to apprehend the attackers.

According to amnesty international report, the security forces have committed violations by killing Rohingya people, firing at random in villages, arbitrarily arresting Rohingya males, raping Rohingya women and girls, and destroying

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homes and property. More than 100 people are alleged to have died as a result of the crackdown.

In August of 2017, the next crisis happened. On the morning of August 25, 2017, members of the Arakan Rohingya Salvation Army (ARSA), a Rohingya militant group, attacked roughly 30 security force stations in northern Rakhine State. In response, a huge security operation was initiated. Myanmar's military carried out heinous retaliation against Rohingya citizens. The Myanmar military retaliated with brutality, which resulted in the destruction of thousands of homes and the deaths of hundreds of Rohingya people. According to Amnesty International Report, The military has carried out a campaign of violence that has been systematic, organized, and widespread.

Similarly, Human Rights Watch discovered that this operation included murder, rape and other forms of sexual violence. Myanmar military forces burned down at least 288 predominantly Rohingya villages and forced more than 600,000 Rohingya, 80% of the group's total estimated population in northern Rakhine state, to flee neighboring Bangladesh, joining hundreds of thousands who had fled Myanmar for Bangladesh because of prior government repression or during earlier violence in 2016.

In the article 7 (1) of the Rome Statute, there is phrase 'widespread or systematic'. This phrase constitutes the "chapeau" or general requirements of a crime against humanity. This chapeau requirement must be demonstrated satisfactorily. Because this is what sets a crime against humanity apart from other international or domestic offenses. A crime may be considered a crime against humanity if it is committed in the context of a widespread or systematic attack against a civilian population.

However, Since the widespread or systematic nature of attacks is disjunctive, there is no obligation to fulfill both elements. This means that fulfilling just one of the conditions is enough to classify a crime as a crime against humanity.

The term "widespread" usually refers to the number of victims and the consequences of the attack. It means that the attack must be large-scale and result in a huge number of casualties. Because there is no set number of attacks or victims, the International Criminal Court and tribunals normally consider variables such as the impact of the attack on the targeted population and the

number of victims in Blaškić appeal judgment, an attack is considered widespread on the basis of the “large-scale nature of the attack and the number of targeted persons.

Systematic, on the other hand, usually refers to the organized nature of acts of violence, such as the repetition of similar criminal actions. It can be signed by the existence of a plan involving attacks, as well as other indicators such as the existence of a specific policy to destroy or weaken a community, discriminatory legislation, or the involvement of high-level political or military figures in the plan's creation.

In the prosecutor v. Akayesu Judgment, the term "widespread" requires massive, frequent, large-scale action involving a substantial number of victims. The action carried out collectively with considerable seriousness and directed against a large number of victims. Whereas, the term "systematic" requires a high degree of orchestration and methodical planning. While in Tadic trial judgment, systematic refers to a pattern or methodical plan.

Based on the previously specified concept of "systematic" or "widespread." During military campaigns in October 2012, October to December 2016, and August 2017, Myanmar military forces appear to have committed crimes against humanity against the Rohingya population in numerous areas of Rakhine state.

According to Report that published by Amnesty International and Human rights Watch, Myanmar security forces committed a multitude of crimes against Rohingya civilians, including murder, rape, and sexual abuse, enforced disappearances, detention, and deportation and forcible population transfer. And those crimes are part of a widespread attack.

During those military campaigns, more than 150 Rohingya people have been slain in Myanmar's military campaign, with some being buried in mass graves and their towns and neighborhoods being demolished. As a result, Rohingya Muslim villages were completely or partially destroyed, and significant numbers of people were displaced.

The large number of victims and the vast scope of destruction serve as solid and significant evidence that the Myanmar military forces has carried out a widespread attack against the Rohingya people.

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The attacks against the Rohingya people in northern Rakhine State were also systematic. A systematic attack refers to the organized nature of the acts of violence and the improbability of their random occurrence or non-accidental repetition of similar criminal conduct.

Amnesty International's report and Human Rights Watch's report show that the large-scale military operations launched in 2016 and 2017 were carried out in a systematic and organized manner. The report shows that there was planning, preparation, initiation and coordination between military forces, local officials and police prior to the attack.

The organized nature and pattern of acts of violence carried out by the Myanmar military forces against the Rohingya civilian population during the two military campaigns suggest that the attacks were also systematic.

In summary, based on evidence and the reports from Amnesty International and Human Rights Watch, a large number of Rohingya people were massacred in a systematic manner (article 7 (1) (a) of the Rome Statute), Women and children were kidnapped, raped, and abused terribly (article 7 (1) (g) of the Rome Statute). The reports also revealed that the Rohingya people were subjected to breaches as a result of widespread forced labor. (article 7 (1) (c) of the Rome Statute), in addition, there are summary executions and torture, which frequently culminated in death (Article 7 (1) (h) of the Rome Statute). Furthermore, the reports revealed that the Myanmar military forces's attacks have resulted in the total or partial annihilation of a primarily Rohingya population in various regions of Rakhine state.(article 7 (1) (b) of the Rome Statute) and have caused Thousands of Rohingya people have been forced to flee their homes (article 7 (1) (d) of the Rome Statute).

Thus, the atrocities committed by Myanmar military forces as part of a widespread and systematic attacks against the Rohingya people could be considered crimes against humanity under international criminal law.

## **Conclusion**

Article 7 of the Rome statute defines Crime against humanity as any of the following acts when committed as part of a “widespread” or “systematic” attack directed against any civilian population, with knowledge of the attack: (a) Murder;

(b) Extermination; (c) Enslavement; (d) Deportation or forcible transfer of population; (e) Imprisonment or other severe deprivation of physical liberty in violation of fundamental rules of international law; (f) Torture; (g) Rape, sexual slavery, enforced prostitution, forced pregnancy, enforced sterilization, or any other form of sexual violence of comparable gravity; (h) Persecution against any identifiable group or collectivity on political, racial, national, ethnic, cultural, religious, gender as defined in paragraph 3, or other grounds that are universally recognized as impermissible under international law, in connection with any act referred to in this paragraph or any crime within the jurisdiction of the Court; (i) Enforced disappearance of persons; (j) The crime of apartheid; (k) Other inhumane acts of a similar character intentionally causing great suffering, or serious injury to body or to mental or physical health. To constitute as crimes against humanity, a commission of act (actus reus) has to fulfil the “widespread” or “systematic” element (mens rea). The word "or" indicates that both elements do not need to be met, implying that fulfilling one of the elements is sufficient and might be considered a crime against humanity. From the analysis that has been made, there is a mountain of evidence that hundreds of thousands of Rohingya women, men, and children have been the victims of a highly orchestrated, widespread and systematic attack carried out deliberately by the Myanmar Military forces. This is punishable under international law, especially in the rezime of international criminal law.

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