



2025/822

28.4.2025

COUNCIL IMPLEMENTING REGULATION (EU) 2025/822
of 25 April 2025
implementing Regulation (EU) No 401/2013 concerning restrictive measures in view of the situation
in Myanmar/Burma

THE COUNCIL OF THE EUROPEAN UNION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Council Regulation (EU) No 401/2013 of 2 May 2013 concerning restrictive measures in view of the situation in Myanmar/Burma and repealing Regulation (EC) No 194/2008 ⁽¹⁾, and in particular Article 4i thereof,

Having regard to the proposal from the High Representative of the Union for Foreign Affairs and Security Policy,

Whereas:

- (1) On 2 May 2013, the Council adopted Regulation (EU) No 401/2013.
- (2) The Council has reviewed the list of natural and legal persons, entities and bodies subject to restrictive measures set out in Annex IV to Regulation (EU) No 401/2013. On the basis of that review, the entries for 14 persons should be amended.
- (3) Regulation (EU) No 401/2013 should therefore be amended accordingly,

HAS ADOPTED THIS REGULATION:

Article 1

Annex IV to Regulation (EU) No 401/2013 is amended in accordance with the Annex to this Regulation.

Article 2

This Regulation shall enter into force on the day following that of its publication in the *Official Journal of the European Union*.

This Regulation shall be binding in its entirety and directly applicable in all Member States.

Done at Brussels, 25 April 2025.

For the Council

The President

A. SZŁAPKA

⁽¹⁾ OJ L 121, 3.5.2013, p. 1, ELI: <http://data.europa.eu/eli/reg/2013/401/oj>.

In Annex IV to Regulation (EU) No 401/2013, the entries for the following 14 persons in the list under the heading 'A. Natural persons referred to in Article 4a', are replaced by the following:

	Name	Identifying information	Reasons	Date of listing
'18.	Sein Win	Date of birth: 24.7.1956; Place of birth: Pyin Oo Lwin, Myanmar/Burma; Nationality: Myanmar; Gender: male	Lieutenant General Sein Win is a member of Tatmadaw and former Minister of Defence (between 24 August 2015 and 1 February 2021). Since February 2021, he has been the chair of the Myanmar War Veterans Organization. On 1 February 2021, he participated in a National Defence and Security Council (NDSC) meeting with the other Tatmadaw members. The NDSC meeting was unconstitutional as it did not include its civilian members. During that meeting, Myint Swe was declared Acting President. Myint Swe then declared a state of emergency and handed over legislative, executive and judicial powers of the State to the Commander-in-Chief of Defence Services Min Aung Hlaing. The procedure for declaring the state of emergency was breached as, under the Constitution, only the President has the authority to declare a state of emergency. By his participation in the NDSC meeting during which it was decided to declare the state of emergency and to hand over the legislative, executive and judicial powers of the State to the Commander-in-Chief of Defence Services, Sein Win contributed to setting aside the results of the elections held on 8 November 2020 and to overthrowing the democratically elected government. Therefore, he is responsible for undermining democracy and the rule of law in Myanmar/Burma. In 2018, the UN as well as international civil society organisations reported gross human rights violations and serious violations of international humanitarian law committed in Kachin, Rakhine and Shan States against the Rohingya population by the military and police forces since 2011 and concluded that many of those violations amount to the gravest crimes under international law. As Minister of Defence from 24 August 2015 to 1 February 2021, Sein Win is responsible for those serious violations and abuses against the Rohingya population.	22.3.2021

	Name	Identifying information	Reasons	Date of listing
20.	Mya Tun Oo	Nationality: Myanmar/Burma; Date of birth: 4.5.1961 or 5.5.1961; Gender: male	General Mya Tun Oo is a member of the Myanmar Armed Forces (Tatmadaw). He was Minister of Defence from 1 February 2021 to 3 August 2023, and is a member of the State Administrative Council (SAC). On 1 February 2023, he was also appointed Deputy Prime Minister. As of 1 August 2023, he also assumed the role of Union Minister of Transport and Communications. He also oversees other junta-controlled supervisory bodies related to foreign investment and trade. On 1 February 2021, the Myanmar Armed Forces (Tatmadaw), led by Commander-in-Chief Min Aung Hlaing, staged a coup in Myanmar by setting aside the results of the elections held on 8 November 2020 and by overthrowing the democratically elected government. As part of the coup, Vice-President Myint Swe, functioning as Acting President, declared a state of emergency on 1 February 2021 and transferred the legislative, executive and judicial powers of the state to the Commander-in-Chief of Defence Services Senior General Min Aung Hlaing. On 2 February 2021, the SAC was established to exercise those powers, preventing the democratically elected government from fulfilling its mandate. Mya Tun Oo participated in the meeting of the National Defence and Security Council (NDSC) on 31 January 2022, which extended the state of emergency until 31 July 2022. As member of the NDSC and SAC, General Mya Tun Oo has been directly involved in and responsible for decision-making concerning state functions and is therefore responsible for undermining democracy and the rule of law in Myanmar/Burma. Additionally, the SAC adopted decisions restricting the rights to freedom of expression, including access to information, and peaceful assembly. The military forces and authorities operating under the control of the SAC have committed serious human rights violations since 1 February 2021, killing civilian and unarmed protestors, restricting freedom of assembly and of expression, including by restricting internet access, and through arbitrary arrests and detention of opposition leaders and opponents of the coup.	22.3.2021

	Name	Identifying information	Reasons	Date of listing
			As member of the SAC, General Mya Tun Oo is directly responsible for those repressive decisions and for serious human rights violations. Furthermore, as former Minister of Defence, Mya Tun Oo bears responsibility for the attacks by the military forces in Kayah State on 25 December 2021 killing more than 30 people, including children and humanitarian staff, and mass killings and torture of civilians throughout Myanmar. In his previous role as Minister of Defence, General Mya Tun Oo was moreover responsible for the bombardments, air raids, and other instances of large-scale violence that have been carried out by the Myanmar armed forces during 2022. Therefore, he is responsible for serious human rights violations in Myanmar/Burma. In 2018, the United Nations as well as international civil society organisations reported gross human rights violations and serious violations of international humanitarian law committed in Kachin, Rakhine and Shan States against the Rohingya population by the military and police forces since 2011 and concluded that many of those violations amount to the gravest crimes under international law. Mya Tun Oo was Joint Chief of Staff of the Myanmar Armed Forces (Tatmadaw), the third most senior position in the Tatmadaw, from August 2016 until his appointment as Minister of Defence. In that capacity, he oversaw military operations carried out in Rakhine State and coordinated the various armed forces, including the Army, Navy and Air Force, as well as the use of artillery. He is therefore responsible for those serious violations and abuses against the Rohingya population.	

	Name	Identifying information	Reasons	Date of listing
24.	Moe Myint Tun	Date of birth: 24.5.1968; Nationality: Myanmar; Gender: male	Lieutenant General Moe Myint Tun was a member of the Myanmar Armed Forces (Tatmadaw) and member of the State Administrative Council (SAC). On 1 February 2021, the Myanmar Armed Forces (Tatmadaw), led by Commander-in-Chief Min Aung Hlaing, staged a coup in Myanmar by setting aside the results of the elections held on 8 November 2020 and by overthrowing the democratically elected government. As part of the coup, Vice-President Myint Swe, functioning as Acting President, declared a state of emergency on 1 February and transferred the legislative, executive and judicial powers of the state to the Commander-in-Chief of Defence Services Senior General Min Aung Hlaing. On 2 February, the SAC was established to exercise those powers, preventing the democratically elected government from fulfilling its mandate. As member of the SAC, Lieutenant General Moe Myint Tun has been directly involved in and responsible for decision-making concerning state functions and is therefore responsible for undermining democracy and the rule of law in Myanmar/Burma. Additionally, the SAC adopted decisions restricting the rights to freedom of expression, including access to information, and peaceful assembly. The military forces and authorities operating under the control of the SAC have committed serious human rights violations since 1 February 2021, killing civilian and unarmed protestors, restricting freedom of assembly and of expression, including by restricting internet access, and through arbitrary arrests and detention of opposition leaders and opponents of the coup. His ongoing influence in the Junta regime is exemplified by the fact that his family members are receiving substantial construction tenders, which typically are only received due to connections with high-ranking officials. As a former member of the SAC, Lieutenant General Moe Myint Tun is directly responsible for those repressive decisions and for serious human rights violations. In 2018, the UN as well as international civil society organisations reported gross human rights violations and serious violations of international humanitarian law committed in Kachin, Rakhine and Shan States against the Rohingya population by the military and police forces since 2011 and concluded that many of those violations amount to the gravest crimes under international law. Lieutenant General Moe Myint Tun served as Commander of the Bureau of Special Operations 6 (BSO 6) and was the Chief of Staff (Army) of the Myanmar Armed Forces (Tatmadaw) until 2019. In that capacity, he oversaw operations in Rakhine State. He is therefore responsible for those serious violations and abuses against the Rohingya population.	22.3.2021

	Name	Identifying information	Reasons	Date of listing
25.	Than Hlaing	Nationality: Myanmar/Burma; Date of birth: 1965; Gender: male	Lieutenant General Than Hlaing is a member of the Myanmar Armed Forces (Tatmadaw). He was appointed Deputy Minister of Home Affairs and Chief of Police on 2 February 2021 and stepped down from those positions on 5 May 2022. He is currently part of the reserve forces. On 1 February 2021, the Myanmar Armed Forces (Tatmadaw), led by Commander-in-Chief Min Aung Hlaing, staged a coup in Myanmar by setting aside the results of the elections held on 8 November 2020 and by overthrowing the democratically elected government. As part of the coup, Vice-President Myint Swe, functioning as Acting President, declared a state of emergency on 1 February 2021 and transferred the legislative, executive and judicial powers of the state to the Commander-in-Chief of Defence Services Senior General Min Aung Hlaing. On 2 February 2021, the SAC was established to exercise those powers, preventing the democratically elected government from fulfilling its mandate. Appointed by the SAC, Lieutenant General Than Hlaing was engaged in actions and policies undermining democracy and the rule of law in Myanmar/Burma, as well as actions that threaten the peace, security and stability of Myanmar/Burma. Additionally, police forces acting under the authority of Lieutenant General Than Hlaing have committed serious human rights violations since 1 February 2021, killing civilian and unarmed protestors, restricting freedom of assembly and of expression, carrying out arbitrary arrests and detaining opposition leaders and opponents of the coup. In his previous roles as Deputy Minister of Home Affairs and Chief of Police, Lieutenant General Than Hlaing was directly responsible for decision making concerning repressive policies and violent actions committed by police against peaceful demonstrators and is therefore responsible for serious human rights violations in Myanmar/Burma.	22.3.2021

	Name	Identifying information	Reasons	Date of listing
32.	Sai Long Hseng	Nationality: Myanmar/Burma; Date of birth: 18.4.1947; Place of birth: Kengtung, Myanmar/Burma; Gender: male; Citizenship verification card: Katana (Naing) 0052495; NRC Number: 13/KATANA (N)-005249; Function: Former Member of State Administrative Council	Sai Long Hseng was a member of the State Administrative Council (SAC) and its Central Advisory Body. On 1 February 2021, the Myanmar Armed Forces (Tatmadaw), led by Commander-in-Chief Min Aung Hlaing, staged a coup in Myanmar by setting aside the results of the elections held on 8 November 2020 and by overthrowing the democratically elected government. As part of the coup, Vice-President Myint Swe, functioning as Acting President, declared a state of emergency on 1 February 2021 and transferred the legislative, executive and judicial powers of the state to the Commander-in-Chief of Defence Services Senior General Min Aung Hlaing. On 2 February 2021, the SAC was established to exercise those powers, preventing the democratically elected government from fulfilling its mandate. As a member of the SAC and its Central Advisory Body, Sai Long Hseng has been directly involved in and responsible for decision-making concerning state functions and is therefore responsible for undermining democracy and the rule of law in Myanmar/Burma. Additionally, the SAC adopted decisions restricting the rights to freedom of expression, including access to information, and peaceful assembly. The military forces and authorities operating under the control of the SAC have committed serious human rights violations since 1 February 2021, killing civilian and unarmed protestors, restricting freedom of assembly and of expression, including by restricting internet access, and through arbitrary arrests and detention of opposition leaders and opponents of the coup. Furthermore, the SAC has imposed martial law in parts of the country allowing the military complete authority over the specified areas, including administrative, judicial and law enforcement functions. In the areas under martial law, civilians, including journalists and peaceful protestors, are prosecuted by military courts, effectively depriving them of the right to due process, including the right to appeal. Violent actions by military and police forces threatening peace, security and stability have increased significantly in areas where martial law has been declared. As a member of the SAC and its Central Advisory Body, Sai Long Hseng is directly responsible for those repressive decisions and for serious human rights violations.	19.4.2021

	Name	Identifying information	Reasons	Date of listing
40.	Tin Aung San	Nationality: Myanmar/Burma; Date of birth: 16.10.1960; Gender: male; National ID: 12/La Ma Na (N) 89 489	Admiral Tin Aung San is the Commander-in-Chief of the Myanmar Navy, a member of the State Administration Council (SAC) and Minister for the Office of Prime Minister. Previously, he served as Minister of Transport and Communication and as Minister of Defence. On 1 February 2021, the Myanmar Armed Forces (Tatmadaw), led by Commander-in-Chief Min Aung Hlaing, staged a coup in Myanmar by setting aside the results of the elections held on 8 November 2020 and by overthrowing the democratically elected government. As part of the coup, Vice-President Myint Swe, functioning as Acting President, declared a state of emergency on 1 February 2021 and transferred the legislative, executive and judicial powers of the state to the Commander-in-Chief of Defence Services Senior General Min Aung Hlaing. On 2 February 2021, the SAC was established to exercise those powers, preventing the democratically elected government from fulfilling its mandate. As a Government Minister of Transport and Communications, he was responsible for communication and networks and thus made decisions and implemented policies that defined the freedom of access to data online. While he occupied this role, there were numerous shutdowns and deliberate slowdowns of the internet, as well as orders for providers to prevent Facebook, Twitter and Instagram from being online. In January 2022, a new draft of the cyber security bill was circulated, which allows for the abuse of surveillance technology in order to monitor and target individuals, and thus to suppress their freedom of expression as well as access to information. He is therefore directly responsible for limiting press freedom and access to information online, as well as for violating the right to privacy of the Myanmar people. In so doing, he has undermined democracy and rule of law in Myanmar/Burma. Being a member of the SAC and Deputy Prime Minister as well as a former Minister of Defence, Tin Aung San has been directly involved in and responsible for decision making concerning state functions and is therefore responsible for undermining democracy and the rule of law in Myanmar/Burma. He is also directly responsible for the repressive decisions taken by the SAC, including legislation that violates human rights and limits the freedoms of the citizens of Myanmar, and for the serious human rights violations committed by the Myanmar security forces.	21.6.2021

	Name	Identifying information	Reasons	Date of listing
44.	Aung Naing Oo	Date of birth: 13.10.1962 or 9.6.1969; Nationality: Myanmar/Burma; Place of birth: Kyaukse, Mandalay, Myanmar/Burma; Gender: male; Address: L 103, Kenyeikthar Lane 6, FMI city, Yangon, Myanmar/Burma; Passport number: DM002656; National ID: 7/PaKhaNa (Naing) 13345; 5/SaKaNa (Naing) 017289	Aung Naing Oo is the former Minister of Commerce. He was the minister for Investment and Foreign Economic Relations from 2 February 2021 until 18 August 2022. He was appointed by the State Administrative Council (SAC), led by Commander-in-Chief Min Aung Hlaing, which took over the legislative, executive and judicial powers of the State as of 2 February 2021. As former Government Minister, he forms part of the military regime which seized power during a military coup and overthrew legitimately elected leaders in Myanmar/Burma. As Minister for Investment and Foreign Economic Relations, he was in charge of facilitating business and investments in Myanmar/Burma and therefore contributes to securing the financial needs of the military regime. In his statements and acts, he has publicly supported the coup and the military regime, including by stating that the international media exaggerated the crisis and also insisting that the civil disobedience movement is coming to an end. Additionally, he barred executives of foreign telecommunications firms from leaving the country without permission and dismissed protesting civil servants from the Ministry in February 2021. Therefore, his actions, policies and activities undermine democracy and the rule of law in Myanmar/Burma, and he is engaged in actions that threaten the peace, security and stability of Myanmar/Burma.	21.2.2022

	Name	Identifying information	Reasons	Date of listing
64.	Ni Lin Aung	Nationality: Myanmar/Burma; Gender: male	Major General Ni Lin Aung has been working in the Eastern Central Command since August 2022. He is the former Commander of the Eastern Command of the Myanmar Armed Forces (Tatmadaw). Part of the jurisdiction of the Eastern Command is the State of Kayah. In an attack on 24 December 2021 near Moso village in Phruso township, Karenni (Kayah) State, at least 35 persons were killed, among them civilians, children and two humanitarian aid workers of the NGO Save the Children. The Tatmadaw is held responsible for the attack. In his position as Commander of the Eastern Command, Major (formerly Brigadier) General Ni Lin Aung directly commanded the units in the State of Kayah, including those responsible for that massacre. On 21 July 2023, Major General Ni Lin Aung was appointed Deputy Minister for Home Affairs and given the joint responsibility of Police Chief, and, on 3 August 2024, he returned to his previous military function. As a former Deputy Minister and a member of the Myanmar Armed Forces (Tatmadaw), he forms part of the military regime which has seized power in a military coup and overthrown the legitimately elected leaders of Myanmar/Burma. Major General Ni Lin Aung is therefore responsible for undermining democracy and the rule of law in Myanmar/Burma and for serious human rights violations and engaging in actions that threaten the peace, security and stability of Myanmar/Burma.	21.2.2022

	Name	Identifying information	Reasons	Date of listing
75.	Phone Myat	Nationality: Myanmar/Burma; Gender: male	Lieutenant General Phone Myat has been the Commander of Bureau of Special Operation 5 (BSO 5) since January 2025 and was Commander of Bureau of Special Operation 3 (BSO 3) of the Myanmar Armed Forces (Tatmadaw) from April 2021 to January 2025. Previously, he served as Deputy Minister at the Ministry of Home Affairs between July 2020 and April 2021, and he was the commander of the Western Command between May 2019 and July 2020. As commander of BSO 5, Phone Myat commands and controls military forces in the area of Yangon. As commander of BSO 3, Phone Myat commanded and controlled military forces of the South Western Command (Ayeyarwaddy), the Southern Command (Bago and Magway) and the Western Command (Rakhine and Chin). Military forces under his command committed serious human rights violations, crimes and atrocities, including killings, ground and aerial attacks against civilians and massacres in the Magway region, Chin State and the Bago region. In his capacity as Commander of BSO 5 and former Commander of BSO 3, Phone Myat is responsible for serious human rights violations, for activities undermining democracy and the rule of law in Myanmar/Burma, as well as for actions that threaten the peace, security and stability of Myanmar/Burma.	8.11.2022

	Name	Identifying information	Reasons	Date of listing
77.	Thet Pon	Nationality: Myanmar/Burma; Gender: male	Lieutenant General Thet Pon is the Commander of Bureau of Special Operation 6 (BSO 6) since January 2025 and was Commander of Bureau of Special Operations 5 (BSO 5) of the Myanmar Armed Forces (Tatmadaw) from June 2020 to January 2025. Previously, he was Commander of the North Western Command until 2017 and the Yangon Regional Commander between 2017 and June 2020. As commander of BSO 6, Thet Pon commands and controls military forces in the area of Nay Pyi Taw. As Commander of BSO 5, Thet Pon commanded and controlled the military forces and the military tribunals in the Yangon Region. In March 2021, the State Administration Council introduced martial law in Myanmar, transferring executive and judicial power to the head of the relevant regional military commands. By July 2022, military tribunals in the Yangon Region sentenced 119 individuals to death, many of them for political reasons, including four members of the democratic opposition who were executed in the Yangon Region. Additionally, military forces in the Yangon region committed violent acts and killings against peaceful protestors, such as the use of lethal force during anti-junta protests in Yangon's Hlaing Tharyar township on 14 March 2021. In his capacity as Commander of BSO 6 and former Commander of BSO 5, Thet Pon is responsible for serious human right violations, for activities undermining democracy and the rule of law in Myanmar/Burma, as well as for actions that threaten the peace, security and stability of Myanmar/Burma.	8.11.2022

	Name	Identifying information	Reasons	Date of listing
78.	Htein Win	Nationality: Myanmar/Burma; Gender: male	Admiral Htein Win is the Navy Commander-in-Chief as well as former Head of Armed Forces Training and former Commander of the Southern Command of the Myanmar Armed Forces (Tatmadaw). As regional commander, he commanded and controlled military forces in the Bago and Magway regions. Military forces in those regions committed air strikes, raids, arson, numerous killings and used human shields. The Magway region is a particular hotspot for brutal anti-opposition operations conducted by the military, using a “Kill All, Burn All, Loot All” strategy in the Magway region. In his capacity as Navy Commander-in-Chief as well as former Head of Armed Forces Training and former Commander of the Southern Command, Htein Win is responsible for serious human right violations, for activities undermining democracy and the rule of law in Myanmar/Burma, as well as for actions that threaten the peace, security and stability of Myanmar/Burma.	8.11.2022
81.	Nyunt Win Swe	Nationality: Myanmar/Burma; Gender: male	Lieutenant General Nyunt Win Swe has been the Commander of Bureau of Special Operation 4 (BSO 4) since 2023. In that capacity, he commands and controls military forces in the area of Yangon. He was the Commander of the Yangon Region of the Myanmar Armed Forces (Tatmadaw) from June 2020 to early 2023. In that capacity, Nyunt Win Swe commanded and controlled military forces in the Yangon Region and oversaw the military tribunals for the Yangon Region. In March 2021, the State Administration Council introduced martial law in Myanmar, transferring executive and judicial power to the head of the relevant regional military commands. By July 2022, military tribunals in the Yangon Region sentenced 119 individuals to death, many of them for political reasons, including four members of the democratic opposition who were executed in the Yangon Region. Additionally, military forces in the Yangon region committed violent acts and killings against peaceful protestors, such as the use of lethal force during anti-junta protests in Yangon's Hlaing Tharyar township on 14 March 2021. In his capacities, Nyunt Win Swe is responsible for serious human rights violations, for activities undermining democracy and the rule of law in Myanmar/Burma, as well as for actions that threaten the peace, security and stability of Myanmar/Burma.	8.11.2022

	Name	Identifying information	Reasons	Date of listing
89.	Maung Maung Aye	Nationality: Myanmar/Burma; Place of birth: Myanmar/Burma; Gender: male; Rank: General	General Maung Maung Aye was the Chief of the General Staff for the Myanmar army, navy, and air force until December 2024. In December 2024, he was appointed Minister of Defence. In those positions, Maung Maung Aye forms part of the regime, which seized power and overthrew legitimately elected leaders in Myanmar/Burma in February 2021. He is actively participating in the purchase of arms from Russia. Further, he also helps to strengthen the Myanmar Armed Forces international positioning through meetings with counterparts from other countries. He is therefore a natural person whose actions, policies or activities undermine democracy or the rule of law in Myanmar/Burma, and who engages in, or provides support for, actions that threaten the peace, security or stability of Myanmar/Burma. He is also responsible for numerous human rights violations.	20.2.2023
95.	Kyaw Swar Lin (a.k.a. Kyaw Swar Linn)	Nationality: Myanmar/Burma; Place of birth: Myanmar/Burma; Gender: male; Function: Chief of the General Staff; former Army Chief of Staff and former Quartermaster General of the Myanmar armed forces	Lieutenant General Kyaw Swar Lin was Quartermaster General from May 2020 to December 2024, when he was promoted to Chief of the General Staff for the Myanmar army, navy, and air force, a high-ranking position in the military of Myanmar/Burma. From October 2023 to December 2024, he was also Army Chief of Staff. In addition, Kyaw Swar Lin runs the Myanmar Economic Corporation (MEC), which is one of the two major conglomerates and holding companies operated by the military, generating revenue for the Myanmar armed forces (Tatmadaw). As Chief of the General Staff, former Army Chief of Staff and former Quartermaster General, he forms part of the military regime which has seized power in a military coup and overthrown the legitimately elected leaders of Myanmar/Burma. Kyaw Swar Lin is therefore a natural person whose policies and activities undermine democracy and the rule of law in Myanmar/Burma, and who provides support for actions that threaten the peace, security and stability of Myanmar/Burma.	20.7.2023'