Research Articles

The (Dis)empowering Effects of Transparency Beyond Information Disclosure: The Extractive Industries Transparency Initiative in Myanmar

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Abstract

This article provides theoretical and empirical insights into the effects of transparency on civil society empowerment by analyzing the Extractive Industries Transparency Initiative (EITI) in Myanmar. It identifies three processes through which the EITI (dis)empowers civil society: *constituting, using,* and *debating* transparency. Whereas most transparency literature focuses on the effects of information disclosure—(*using* transparency)–the empowering effects of *constituting* and *debating* transparency are, for the EITI in Myanmar, much greater. While civil society organizations (CSOs) hardly *use* the EITI report as it lacks actionable information, the EITI has given CSOs a previously unimaginable role through their involvement in designing and implementing the EITI—i.e., in *constituting* transparency—and in EITI-related awareness-raising activities and debates, or *debating* transparency. Though in unequal ways, the processes of constituting and debating transparency empower CSOs to request, collect, and *use* more actionable information than through the EITI alone. This article argues that transparency initiatives could benefit from focusing attention on not only *what* information to disclose but also *through which processes*.

An increasingly important element of recent shifts in state and nonstate governance arrangements is the growing reliance on transparency-based governance

mechanisms, particularly in the environmental governance realm. This so-called "transparency turn" is likely to persist, as it forms an inherent part of wider transformations in society, such as globalization, the information age, and the changing role of state and nonstate actors (Gupta 2008, 1; Gupta and Mason 2014; Mol 2006, 2010). Transparency is often associated with more democratic, legitimate, accountable, and inclusive governance. Yet such associations are more often assumed than critically assessed (Gupta 2008), even as studies—though limited in number—show that these are not always as straightforward as they are assumed to be (e.g., Dingwerth and Eichinger 2010; Fox 2007; Fung et al. 2007; Gupta and Mason 2014; Kolstad and Wiig 2009).

With transparency-based governance mechanisms growing in number, scope, and (geographic) coverage, an increasingly relevant question is not only whether but also how and through what processes transparency may lead to more democratic, accountable, and inclusive governance. What are the effects of the transparency turn under the often challenging governance conditions in developing countries, such as those with fledgling democracies and poorly developed governance frameworks? Although the transparency turn is increasingly studied in policy domains, such as international relations and human rights, literature within the environmental governance domain has mostly focused on the effects of transparency at the global level or in developed countries, with much less attention to the effects of the transparency turn in non- or early democratic countries (Mol 2009; Tan 2014).

This article addresses this literature gap by studying the effects of the Extractive Industries Transparency Initiative (EITI) on the role of civil society actors in Myanmar. Myanmar is one of the least developed countries in the world and has undergone one of the most recent democratic transitions (Coe 2016). Since 2011, Myanmar has been going through a political and economic reform process after a long period of military-based and oppressive governance. A key part of Myanmar's democratization process is the implementation of the EITI, a global standard to enhance transparency in the extractive industries sector. One of the EITI's broader visions is to empower citizens, build the capacity of civil society organizations (CSOs), and enhance their political space by engaging in the governance of extractive industries (EITI 2016a). After years of civic oppression, the EITI raised high expectations among CSOs in Myanmar. The growing body of literature on the EITI in developing countries, however, points to mixed results of the EITI in empowering civil society actors, particularly in non- or early-democratic countries (Furstenberg 2015; Öge 2017; Rustad et al. 2017; Sovacool and Andrews 2015). This article assesses to what extent and how specific processes of the EITI (dis)empower civil society actors at the national and subnational levels in Myanmar.

The next two sections of this article provide brief literature reviews of the effects of transparency and the effects of the EITI on civil society empowerment, while identifying key gaps in this literature. I identify three processes through which transparency initiatives may (dis)empower civil society: *constituting*, *using*, and *debating* transparency. Next, I describe the institutionalization of

transparency through the EITI in Myanmar. The main analysis assesses the effects of the EITI on the empowerment of civil society actors in Myanmar through the three identified processes. The conclusion reflects on which of these processes are representative of transparency initiatives and provides novel empirical and theoretical insights into whether, how, and through which processes transparency (dis)empowers civil society.

The article is based on a primary and secondary literature review and twelve months of fieldwork in Myanmar (September 2016–August 2017), during which I attended conferences and workshops and carried out interviews and focus group discussions. I conducted more than eighty interviews in various places in Myanmar as well as in Chiang Mai (Thailand) and London, with representatives of civil society, the government, the private sector, and international organizations involved in or knowledgeable of the EITI.

Analyzing the Effects of Transparency on Civil Society Empowerment

Owing in part to high expectations for boosting the legitimacy, accountability, and effectiveness of governance, transparency is increasingly becoming a default option in environmental governance (Gupta and Mason 2014; Haufler 2010). It is surprising, therefore, that relatively little research has been carried out on whether, how, for whom, and under what conditions transparency actually matters in this realm (Gupta and Mason 2014), especially in developing countries (Mol 2009; Tan 2014). The limited research that critically assesses transparency is often based on the assumption that the effects of transparency operate through a causal chain (Figure 1): transparency leads to increased information disclosure, which leads to an informed public, which in turn leads to (demands for) more accountability and good governance (e.g., Epremian et al. 2016; Haufler 2010; Lujala and Epremian 2016). Studies that criticize transparency for its limited effects typically identify caveats in this so-called transparency narrative. They argue, for example, that for transparency to 'work', the disclosed information needs to meet certain criteria, such as (1) being accessible, understandable, valuable, actionable, and comparable (Dingwerth and Eichinger 2010; Fox 2007; Fung et al. 2007; Mol 2010; Ofori and Lujala 2015); (2) resonating with and becoming embedded in the users' daily routines (Dingwerth and Eichinger 2010; Gupta and Mason
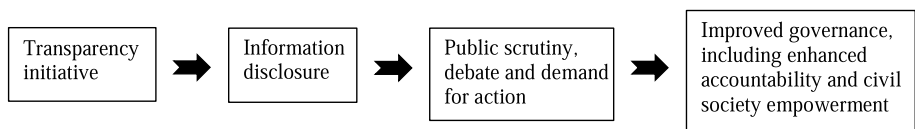

Figure 1
The Transparency Narrative

Adapted from Epremian et al. (2016) and Lujala and Epremian (2016).

2014); and (3) being used by an active, capable, and independent civil society or public (Dingwerth and Eichinger 2010; Haufler 2010; Mol 2010; Ofori and Lujala 2015). Also, accountability mechanisms need to be in place for the newly informed public or civil society to hold responsible actors accountable for their actions (Mol 2009, 2010).

Few articles go beyond this narrow transparency narrative to study the process through which the information to be disclosed is identified, generated, disseminated, and debated. Those articles that do analyze this process focus on global environmental negotiations and the contested nature of that information (e.g., Falkner 2000; Gupta 2000) rather than (also) analyzing the ways in which processes of producing and debating information affect the outcomes of transparency initiatives (for some exceptions, see Fenster 2006; Furstenberg 2015; Gupta et al. 2014). Analyses of the processes through which transparency initiatives (dis)empower are crucial, because, as Dingwerth and Eichinger (2010, 75) argue, "empowerment may be a feature of *specific schemes* … , but not necessarily of disclosure policies *in general*." And, as many articles in the field of science–technology studies show, how and by whom information is generated can have both empowering and disempowering consequences (e.g., Gupta et al. 2014; Luke 1995; Scott 1998).

A number of articles have called for a larger focus on the process through which transparency is constituted, especially in the field of informational governance (Mol 2006, 2009, 2010). As Mol (2006, 501) argues, for example,

> it is … not so much the substantial content of information … that make[s] a difference and begin[s] to give environmental information "transformative" capacities. Rather, the transformative capacity of information in environmental reform is the product of the enhanced possibilities and capacities of environmental information collection, processing, transmission, and use.

This "transformative capacity of information" is, however, seldom studied. This article assesses the transformative capacity of transparency by studying the effects of the EITI on civil society empowerment in Myanmar. On the basis of analyses of empirical material, I identify three processes through which the EITI (dis)empowers civil society, namely, *constituting* transparency, i.e., decision-making processes on what information to generate, collect, and disclose, how, and by whom; *using* transparency, i.e., making use of disclosed information by, for example, holding responsible actors to account; and *debating* transparency, i.e., disseminating and discussing information. As I will show, distinguishing between these processes enables assessment of not only *whether* but also *how and under what conditions* the EITI (dis)empowers civil society.

Analyzing the Effects of the EITI on Civil Society Empowerment

The largest global transparency standard for the extractive industries sector is the EITI. Countries that are candidates to the EITI are required to disclose information

about payments, licenses, production, and contracts between oil, gas, and mining companies and the government. EITI-implementing countries are also required to establish a multistakeholder group (MSG) to oversee the implementation of the standard. The MSG involves government agencies, companies, and the "full, independent, active and effective participation" of civil society (EITI 2016a, 14). The EITI is expected to empower citizens not only through enhanced political space of civil society to influence decision-making on EITI implementation, but also through enhanced public awareness and debate as well as increased technical, financial, and institutional capacity of CSOs. The idea is that this results in enhanced abilities among citizens and civil society to hold government and companies to account for (the impacts of) resource extraction (EITI 2016a).

The EITI has had mixed results when it comes to empowering civil society. On the positive side, it has increased the participation of CSOs through MSGs in many countries, and has built trust and collaborations between government, civil society, and companies (Aaronson 2011; Furstenberg 2015; Rustad et al. 2017; Sovacool and Andrews 2015; Van Alstine 2014a; Wilson and Van Alstine 2014). In some cases, the EITI even presents (one of) the first opportunities for CSOs to discuss the governance of the extractive industries sector with the government and companies (Ospanova et al. 2013; Rustad et al. 2017).

On the negative side, many authors have pointed to the limited partnership between the stakeholder groups, with a lack of full civil society participation (Aaronson 2011; Furstenberg 2015; Smith et al. 2012; Sovacool and Andrews 2015). Haufler (2010) argues, for example, that power remains strongly vested in the government or private-sector elites. In the case of Kyrgyzstan, Furstenberg (2015) even argues that the government uses the EITI to retain its authoritarian style of governance. Many analyses also show how certain CSOs that are more independent from or critical of the government are actively undermined in the EITI process (Aaronson 2011; Kolstad and Wiig 2009; Öge 2017; Ospanova et al. 2013; Wilson and Van Alstine 2014). A key challenge is that most EITI-implementing countries are either non- or early democratic countries with underdeveloped governance mechanisms and political representation and, often, long histories of conflict and civic oppression (Epremian et al. 2016; Furstenberg 2015; Öge 2017; Sovacool and Andrews 2015).

Although a growing body of literature considers the (dis)empowering effects of the EITI, most contributions do not consider the theoretical implications of these findings for the role of transparency in (environmental) governance (for exceptions, see Epremian et al. 2016; Haufler 2010; Mejía Acosta 2013; Van Alstine 2014a, 2014b). Clearly, more research is needed on how and under what conditions transparency—and the EITI in particular—leads to civil society empowerment in developing countries.

Institutionalizing Transparency in Myanmar Through the EITI

Myanmar has recently embarked on the transparency turn by implementing the EITI. Empowering civil society actors through institutionalizing transparency in Myanmar is particularly challenging, as it is one of the least developed countries in the world, with one of the world's most recently reinstated democracies (Coe 2016). Myanmar has experienced decades of military rule and civil war, with an active and at times brutal oppression of civil society. Grievances have historically been addressed not through dialogue but with force (Adam Smith International 2015). For a long time, CSOs avoided becoming (too openly) involved in politics or politically sensitive topics, such as human rights or democracy, focusing instead on service delivery at the local level. In 2011, Myanmar embarked on a radical political and economic reform process, making a quick transition from a military regime to a quasi-civilian government and, by the beginning of 2016, to a (partly) democratically elected government. After its first transition, the government of Myanmar actively started to seek civil society participation in working groups and the drafting or amending of laws and regulations (Kramer 2011; Simpson 2013).

A "central part" of Myanmar's democratization process is implementing the EITI.[1] Myanmar's extractive industries sector, while being the main source of revenue for the government of Myanmar, is characterized by major environmental problems, widespread displacement of people, severe human rights abuses, ethnic conflicts, increased militarization, and poor governance (Adam Smith International 2015; Thet Aung Lynn and Mari Oye 2014). One of the main challenges is the large gaps in government capacity, combined with high levels of secrecy and corruption. According to the Resource Governance Index—a tool that measures transparency and accountability in countries' oil, gas, and mining sectors—Myanmar scored among the lowest of the eighty-nine evaluated countries (Natural Resource Governance Institute 2017). Besides the occurrence of widespread and endemic corruption, Myanmar lacks regulations for information disclosure, revenue reporting, public participation, and grievance mechanisms (Adam Smith International 2015; Thet Aung Lynn and Mari Oye 2014). Furthermore, the governance of Myanmar's extractive industries sector is characterized by the lack of a clear policy framework or vision, poor to no coordination between governmental departments, low enforcement of policies, and overlapping or conflicting governance systems in ethnic areas. An environmental governance framework was virtually nonexistent until 2012.

To address some of the governance challenges in the extractive industries sector, Myanmar became a candidate to the EITI in 2014, after the establishment of its MSG. Following quick progress toward EITI implementation, Myanmar submitted its first EITI report in January 2016. Shortly after this, and mainly because of the government's transition, the MSG was disbanded and remained

1. https://eiti.org/Myanmar, last accessed August 15, 2017.

inactive until April 2017, causing at least a year's delay to the submission of the second report, which was due in January 2017 (Rogers et al., n.d.).

At its initiation, many CSOs had high expectations of the EITI for addressing human rights abuses and environmental problems, enhancing accountability and increasing civil society involvement in the governance of the extractive industries sector.[2] More skeptical CSOs, however, perceived the EITI as a form of window dressing by the government. They believed that the main reason for the government to join the EITI was to bolster Myanmar's international (business) reputation and attract more foreign investment, leading to further environmental and social problems that the country's poorly developed governance framework is unable to address.[3] A crucial and timely question is, therefore, whether, how, and under what conditions the EITI in Myanmar stimulates a more inclusive and accountable governance of the extractive industries sector.

The Effects of Transparency on Civil Society Empowerment in Myanmar: The EITI

In analyzing the effects of the EITI on civil society empowerment, this section looks at three processes. These processes, briefly mentioned above, are based on three elements of the EITI process identified in the EITI standard (Figure 2). First, I consider the process through which transparency is *constituted* within the MSG and the role of civil society therein. Second, I consider the *use* of transparency by assessing to what extent and how information disclosure in the form of the EITI report helps CSOs to hold the government or companies accountable. Finally, I analyze how transparency is *debated* by assessing to what extent and how the EITI stimulates debates and public awareness around natural resource governance.

Constituting Transparency: The EITI MSG

The initialization of the EITI process in 2013 was unique in the context of Myanmar, as it was the first time ever that civil society had been invited to engage in political discussions with the government. Initially, discussions within the MSG were characterized by much distrust between the three stakeholder groups. While the government and companies were, at least to some extent, used to collaborating, bringing together government and civil society representatives proved particularly challenging, with meeting rooms initially split so that the stakeholder groups could talk separately (Vijge and Simpson, n.d.). Owing to decades of oppression and human rights violations, many CSOs

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2. Author's Skype interview with a representative of an international organization, May 7, 2015.
3. Author's interviews with a CSO representative in EITI MSG, September 20, 2016, Yangon; a CSO representative, July 27, 2017, Yangon; an INGO representative, August 31, 2016, London; and a MATA coordinator, March 29, 2017, Yangon.

1 A national **multi-stakeholder group** (government, industry and civil society) decides how their EITI process should work.

2 Government revenue and company payments are **disclosed** together with other information about the extractive sector.

3 The findings are communicated to create **public awareness and debate** about how the country should manage its resources.

Figure 2
The Three Elements of the EITI Process

From EITI (2016a).

had difficulties negotiating with the government on the issue of revenue transparency rather than addressing the many adverse impacts they experienced from resource extraction. While the EITI is not primarily aimed at addressing these impacts, CSOs in Myanmar have few to no mechanisms at their disposal to hold the government accountable for these impacts. CSOs therefore called for a broad scope of the EITI report with inclusion of environmental impact assessments and coverage of not only oil, gas, and mining but also the hydropower and forestry sectors. Government representatives, however, were mainly interested in quick progress toward EITI compliance and pushed for a narrow scope of information disclosure with a limited coverage of sectors. This shows that friction existed over what was to be made transparent (for similar observations, see Aaronson 2011; Smith et al. 2012; Sovacool and Andrews 2015; Van Alstine 2014a).[4]

In the end, the EITI report did not meet CSOs' demands to include environmental and social impact assessments or a broad range of sectors. Important in this decision was the tight deadline for producing the first EITI report and the crucial role of the Myanmar EITI coordination office—hosted by a national think tank—in supporting the government to push toward meeting this deadline.[5]

Despite this, CSOs did manage to use the EITI process to draw attention to the adverse impacts and human rights violations in the extractive industries sector, partly by means of international exposure and scrutiny. The most important example of this was the way in which protests against the notorious Letpadaung copper mine played a role in the EITI process. Protests against the mine's large-scale environmental destruction and deprivation of livelihoods culminated in 2014 when a protestor was shot by the police. CSOs that did not partake in the EITI process exerted pressure on CSO representatives within the MSG to demand accountability and action of the government.[6] CSO representatives accused the

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4. Author's interviews with a representative of an international organization, December 16, 2016, Yangon; and with a CSO representative in EITI MSG, September 20, 2016, Yangon.
5. Author's interview with a representative of an international organization, December 16, 2016, Yangon.
6. Author's interview with a CSO representative in EITI MSG, September 20, 2016, Yangon.

government of breaching its EITI commitments and threatened to withdraw from the EITI process. In, for the EITI, a highly unusual process, CSOs arranged an extraordinary MSG meeting attended by the head of the EITI international secretariat to discuss the adverse social and environmental impacts of the mine with the Myanmar government (MEITI 2015). Although the meeting did not result in concrete decisions, it did generate large national and international media attention and put pressure on responsible actors.[7] Partly as a response to this incidence, CSOs developed a template for EITI-implementing countries to report potential breaches of the EITI's civil society protocol (EITI 2016b). This template, piloted in Myanmar, (also) enables civil society to address adverse social and environmental impacts from extractive industries.[8]

Overall, the EITI process has led to, in Myanmar, an unprecedented role for civil society in the governance of the extractive industries sector, with CSOs engaged in the EITI process at both national and subnational levels generally indicating satisfaction with their influence.[9] CSOs are amply represented in the MSG; while the government and private sector each have six representatives in the MSG, there are nine CSO representatives. Through civil society involvement in the MSG, CSOs learn to lobby, engage in political dialogue, and help improve governmental policies and regulations, often for the first time ever.[10]

Such empowerment has not, however, taken place equally among CSOs. Burmese CSOs are often privileged over ethnic minority groups. Of the nine CSO representatives who participated in the MSG, only one or two were from ethnic groups.[11] CSOs in ethnic and rural areas often do not (yet) enjoy the freedom of speech that Nay Pyi Taw– or Yangon-based ones are now starting to gain. Unequal representation in the MSG, however, does not happen through active obstruction by the government, as is the case in some other EITI-implementing countries (Aaronson 2011; Kolstad and Wiig 2009; Wilson and Van Alstine 2014). CSOs operating in Yangon or Nay Pyi Taw simply have more resources and ability to attend the MSG meetings, trainings, and workshops (Kramer 2011).[12] And although CSO representatives in the MSG are selected

7. Author's interview with representative 1 of a national think tank, September 17, 2016, Magway.
8. Author's interview with a representative of Publish What You Pay, August 31, 2016, London.
9. Author's interviews with former MATA coordinator 1, March 12, 2016, Yangon; former MATA coordinator 2, November 17, 2016, Yangon; a representative of Publish What You Pay, August 31, 2016, London; the director of an NGO, November 25, 2016, Yangon; MATA Magway representatives 1 and 2, June 5, 2017, Magway; a MATA representative, May 29, 2017, Yangon; and CSO representative 3, June 3, 2017, Mandalay.
10. Author's interviews with former MATA coordinator 1, September 22, 2016, Yangon; a CSO representative in EITI MSG, September 20, 2016, Yangon; a representative of an international organization, September 6, 2016, Yangon; an INGO representative, September 20, 2016, Yangon; an ethnic CSO representative, October 5, 2016, Chiang Mai; representative 2 of a border-based CSO, October 7, 2016, Chiang Mai; a MATA Mandalay representative, June 4, 2017, Mandalay; a former MATA Mandalay representative, June 4, 2017, Mandalay; and representative 2 of a national think tank, May 30, 2017, Yangon.
11. Author's interview with representative 1 of a national think tank, December 7, 2016, Nay Pyi Taw.
12. Author's interview with a representative of an oil company, November 17, 2016, Yangon.

through an election process in all states and regions of Myanmar, some consider this process to be illegitimate and/or inadequate in representing Myanmar citizens, owing, in part, to exclusion of certain CSOs from ethnic states.[13] Burmese civil society groups have even been accused of purposefully preventing ethnic groups from participating or voicing their opinions.[14]

Using Transparency: Use of the EITI Report

Despite various shortcomings, the first EITI report in Myanmar was widely heralded by national and international civil society groups as a major achievement in shedding light on the largely opaque extractive industries sector. An example of how CSOs used the EITI report was by demanding regular disclosure of information on the unclear usage of revenues by Myanmar's state-owned enterprises (Heller and Delesgues 2016). Following much media attention on this issue shortly after the first EITI report was published, the government announced a review of state-owned enterprises, though how this has progressed so far is unclear.[15]

Apart from this example, Myanmar's EITI report is not widely used by civil society actors or citizens.[16] Explanations for this are in line with the common critique of the transparency narrative discussed earlier. First, although many citizens—and even government officials—remain unaware of the EITI, civil society actors who are aware of the EITI report are often unable to understand the information from the report, let alone use it to hold responsible actors accountable. The (technical) capacity among CSOs in Myanmar is (still) very low, especially among those from ethnic areas.[17] Second, the EITI report does not provide specific or actionable information, for example, on the terms of contracts and licenses, on specific states and regions, or on beneficial ownership.[18] As such, the EITI report provides only limited opportunities for citizens or CSOs to monitor extraction in their areas and hold operators accountable for adverse

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13. Author's interviews with an ethnic CSO representative, October 5, 2016, Chiang Mai; a CSO representative, July 27, 2017, Yangon; MATA Magway representative 2, June 5, 2017, Magway; and CSO representatives 3 and 4, June 3, 2017, Mandalay.
14. Author's interview with an ethnic CSO representative, October 5, 2016, Chiang Mai.
15. Author's interviews with representative 1 of a national think tank, July 18, 2017, Yangon; and a representative of a state-owned enterprise, August 17, 2017, Nay Pyi Taw.
16. Author's interviews with former MATA coordinator 1, September 22, 2016 and December 3, 2016, Yangon; MATA Magway representative 1, June 5, 2017, Magway; a representative of Magway EITI Watch Group, December 12, 2016, Magway; and the director of an NGO, November 25, 2016, Yangon.
17. Author's interviews with a representative of Magway EITI Watch Group, December 12, 2016, Magway; a representative of an oil company, November 17, 2016, Yangon; the head of CSR of an oil company, November 17, 2016, Yangon; former MATA coordinator 1, September 22, 2016, and December 3, 2016, Yangon; a representative of a political party, December 3, 2016, Bago; and a township secretary of a political party, December 3, 2016, Bago.
18. Author's interviews with former MATA coordinator 1, September 22, 2016, Yangon; former MATA coordinator 2, November 17, 2016, Yangon; a representative of Magway EITI Watch Group, December 12, 2016, Magway; and the head of CSR of an oil company, November 17, 2016, Yangon.

impacts. Third, Myanmar severely lacks accountability mechanisms, especially at the local level. The country has no legal obligations for project-level grievance mechanisms, it lacks free legal aid systems for the poor to address their grievances, and its legal system is poorly developed and frequently unreliable or corrupt. What is more, public demonstrations demanding accountability and actions of extractive industry operators are at times violently stopped by police forces.

Debating Transparency: Public Awareness and Debates Around the EITI

The EITI in Myanmar has stimulated many awareness-raising activities, such as workshops, seminars, and conferences at the national, state, district, and even township levels on the topic of the EITI as well as, more broadly, natural resource governance.[19] One of the most significant outcomes of the EITI in terms of civil society empowerment is the establishment of one of Myanmar's first civil society coalitions, the Myanmar Alliance for Transparency and Accountability (MATA). Established in 2014, MATA aims to build CSOs' capacity and facilitate CSO engagement in the EITI process (for similar observations, see Wilson and Van Alstine 2014). It reportedly consists of 580 CSOs from across the country. MATA not only organizes CSO representation in the national MSG but also operates through multistakeholder working groups in various states and regions to discuss the EITI and, more broadly, natural resource governance.[20]

Notwithstanding the enhanced civil society coordination that MATA embodies, some civil society representatives argue that the EITI has divided CSOs and distracted them from their core objectives.[21] Some more critical CSOs that do not partake in MATA or the EITI process are of the opinion that the EITI has made CSOs in Myanmar lose their citizen-oriented focus and become too donor driven;[22] has enhanced inequality between CSOs that are included in and excluded from the EITI process;[23] and has silenced CSOs by promises

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19. Author's interviews with a CSO representative in EITI MSG Magway, December 11, 2016, Magway; a representative of Magway EITI Watch Group, September 18, 2016, and December 12, 2016, Magway; representative of a coal company 2 in EITI MSG Magway, December 12, 2016, Magway; a representative of an international oil company in EITI MSG Magway, December 12, 2016, Magway; a MATA Mandalay representative, June 4, 2017, Mandalay; MATA Magway representative 4, June 5, 2017, Magway; and CSO representative 3, June 3, 2017, Mandalay.
20. Author's interviews with a MATA coordinator, November 29, 2016, Yangon; CSO representative 4, June 3, 2017, Mandalay; a former MATA Mandalay representative, June 4, 2017, Mandalay; and MATA Magway representative 1, June 5, 2017, Magway.
21. Author's interviews with CSO representative 2, December 14, 2016, Mandalay; a former MATA Mandalay representative, June 4, 2017, Mandalay; and a CSO representative, July 27, 2017, Yangon.
22. Author's interviews with representative 1 of a border-based CSO, October 4, 2016, Chiang Mai; a former CSO representative in EITI MSG Mandalay, December 14, 2016, Mandalay; CSO representative 4, June 3, 2017, Mandalay; an ethnic CSO representative, October 27, 2016, Mawlamyine; and an ethnic CSO representative, October 5, 2016, Chiang Mai.
23. Author's interviews with a former CSO representative in EITI MSG Mandalay, December 14, 2016, Mandalay; a CSO representative in EITI MSG, September 20, 2016, Yangon; an INGO representative, September 20, 2016, Yangon; and representative 2 of a border-based CSO, October 7, 2016, Chiang Mai.

of "hollow" governmental reforms, such as transparency initiatives that do not, in their eyes, address the core issues in natural resource governance in Myanmar (for similar observations, see Auld and Gulbrandsen 2014; Furstenberg 2015; Mol 2010).[24] While the size and geographical coverage of MATA are significant in the context of Myanmar, the coalition has struggled with internal disputes, including contestation around membership, with some listed members not having consented to be represented by MATA.[25] Some ethnic groups complained that MATA is too centralized and that it marginalizes and paternalizes ethnic groups.[26] According to some, MATA is not necessarily bound by a prime interest in enhancing transparency in the extractive industries sector but by the networking opportunities and the sense of security it provides against the Myanmar government and army.[27] Indeed, MATA was established to serve the need that CSOs feel to speak with one voice to counter the strong positions of the government and companies (Vijge et al., n.d.).[28] The internal struggles of MATA show, however, that efforts to homogenize the representation of civil society in a country as (ethnically) diverse as Myanmar do not necessarily result in equal empowerment (see also Vijge et al., n.d.; Vijge and Simpson, n.d.).

Constituting, Using, and Debating Transparency: Empowering CSOs to Evoke Action?

The preceding analyses suggest that the process of *using* transparency through the EITI report is the least effective of the three identified processes in empowering civil society in Myanmar. What is important to consider, however, is the reinforcing interactions between the three processes. Through *constituting* and *debating* transparency, CSOs in Myanmar build their capacity and knowledge around extractive industries, organize themselves within MATA, and build important relations with government and company representatives. This in turn enables CSOs to demand, gather, and *use* information that is more specific and actionable than what has been disclosed through the first EITI report.[29] The availability of

24. Author's interviews with representative 1 of a border-based CSO, October 4, 2016, Chiang Mai; and with the director of an NGO, November 25, 2016, Yangon.
25. Author's interviews with an ethnic CSO representative, October 5, 2016, Chiang Mai; and representative 1 of a border-based CSO, October 4, 2016, Chiang Mai.
26. Author's interviews with representative 1 of a national think tank, September 5, 2016, Yangon; a CSO representative in EITI MSG, September 20, 2016, Yangon; an ethnic CSO representative, October 5, 2016, Chiang Mai; and a former CSO representative in EITI MSG Mandalay, December 14, 2016, Mandalay.
27. Author's interview with a CSO representative in EITI MSG, September 20, 2016, Yangon.
28. Author's interviews with a former MATA Mandalay representative, June 4, 2017, Mandalay; and MATA Magway representative 1, June 5, 2017, Magway.
29. Author's interviews with representatives of a coal company 1 and 2 in EITI MSG Magway, December 11–12, 2016, Magway; a representative of a small-scale oil company in EITI MSG Magway, December 11, 2016, Magway; a CSO representative in EITI MSG Magway, December 11, 2016, Magway; and a representative of an international oil company in EITI MSG Magway, December 12, 2016, Magway.

such actionable and specific information again helps to build trust, respect, and understanding between government, civil society, and the private sector.[30] This is especially apparent at the subnational level (see also Vijge et al., n.d.).

In 2015, subnational MSGs were initiated in Magway and Mandalay[31] to raise awareness about and discuss the EITI and—in reality, often more important—the adverse impacts of extractive industries. The establishment of these MSGs followed a request from MATA, which experienced difficulties at the subnational level in demanding information from the government.[32] The subnational MSGs triggered CSOs in Magway and Mandalay—both MATA and non-MATA members—to take a leading role in monitoring the impacts of extractive industries, sometimes in collaboration with the government, citizens, and even companies in their region.[33] Civil society representatives declared that they highly valued the generation and exchange of information facilitated by the MSGs, even as this information is by no means complete.[34] The enhanced availability of information also enabled civil society to more effectively communicate with the other stakeholder groups, using arguments based on reliable information rather than, as they initially did, on assumptions.[35]

While the EITI process to some extent empowered CSOs to use information to *demand* accountability, the extent to which CSOs at the subnational level have been able to *evoke* action is limited (for similar observations, see Rustad et al. 2017).[36] This is (at least partly) because state or regional governments have limited authority to formulate plans for managing (impacts from) natural

30. Author's interviews with a MATA Mandalay representative, June 4, 2017, Mandalay; CSO representative 3, June 3, 2017, Mandalay; a former MATA Mandalay representative, June 4, 2017, Mandalay; a representative of a small-scale oil company in EITI MSG Magway, December 11, 2016, Magway; and representative of a coal company 2 in EITI MSG Magway, December 12, 2016, Magway.
31. Though the national MSG decided to establish four EITI subnational coordination units, MSG meetings have only taken place in two regions: Mandalay and Magway.
32. Author's interview with MATA Magway representative 1, June 5, 2017, Magway.
33. Author's interviews with CSO representative 3, June 3, 2017, Mandalay; a MATA Mandalay representative, June 4, 2017, Mandalay; a former MATA Mandalay representative, June 4, 2017, Mandalay; a representative of Magway EITI Watch Group, December 12, 2016, Magway; representatives of a coal company 1 and 2 in EITI MSG Magway, December 11–12, 2016, Magway; a representative of a small-scale oil company in EITI MSG Magway, December 11, 2016, Magway; a CSO representative in EITI MSG Magway, December 11, 2016, Magway; MATA Magway representative 4, June 5, 2017, Magway; representative 2 of a national think tank, May 30, 2017, Yangon; a private-sector representative, June 3, 2017, Mandalay; and a representative of an international oil company in EITI MSG Magway, December 12, 2016, Magway.
34. Author's interviews with representatives of a coal company 1 and 2 involved in EITI MSG Magway, December 11–12, 2016, Magway; a representative of a small-scale oil company in EITI MSG Magway, December 11, 2016, Magway; a CSO representative in EITI MSG Magway, December 11, 2016, Magway; MATA Magway representatives 1 and 2, June 5, 2017, Magway; and a representative of an international oil company in EITI MSG Magway, December 12, 2016, Magway.
35. Author's interview with a MATA Mandalay representative, June 4, 2017, Mandalay.
36. Author's interviews with CSO representative 4, June 3, 2017, Mandalay; representative of a coal company 2 in EITI MSG Magway, December 12, 2016, Magway; a MATA representative, May 29, 2017, Yangon; CSO representative 3, June 3, 2017, Mandalay; and a CSO representative, July 27, 2017, Yangon.

resource extraction. In a number of cases in Mandalay and Magway, CSOs used the information gathered through the aforementioned monitoring practices to submit reports to the national MSG or union-level ministries to demand action in addressing the adverse impacts of extractive industries.[37] Most of the time, however, these demands did not result in response or action.[38] Apart from limited decentralization, another important constraint in CSOs' ability to evoke action is the lack of specific rules and regulations that mandate civil society involvement in governmental decision-making. Because of this, the level of such involvement mainly depends on the goodwill of individual government officials and is therefore highly variable across the states and regions of Myanmar.[39]

Conclusions

In analyzing the effects of the EITI on civil society empowerment in Myanmar, this article identified three processes through which civil society empowerment can take place: *constituting*, *using*, and *debating* transparency. I argue that whereas most transparency literature mainly focuses on the effects of information disclosure—that is, *using* transparency—the processes of *constituting* and *debating* transparency have much larger empowering effects in the case of the EITI in Myanmar. What is more, these processes also empower civil society in more effectively demanding, checking, collecting, and *using* information that is more specific and actionable than what has been disclosed through the EITI report. I also argue, however, that the EITI process has empowered civil society in unequal ways by creating new forms of inclusion and exclusion. This does not happen through active obstruction by the government but through uneven representation among civil society actors. Though the EITI in Myanmar has empowered certain CSOs to demand accountability of the government and companies regarding the adverse impacts of extractive industries, CSOs' ability to *evoke* response and action from responsible actors is limited, mainly because of institutional constraints (for similar observations, see Fox 2007; Fung et al. 2007; Kosack and Fung 2014).

Theoretically, this article showed that the empowering effects of transparency initiatives are not as linear as often portrayed in the literature, which commonly draws on the so-called transparency narrative. As I show, processes of constituting and debating transparency are important for CSOs to build

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37. Author's interviews with a MATA Mandalay representative, June 4, 2017, Mandalay; MATA Magway representative 4, June 5, 2017, Magway; CSO representative 3, June 3, 2017, Mandalay; CSO representative 4, June 3, 2017, Mandalay; representative of Magway EITI Watch Group, December 12, 2016, Magway; and a former MATA Mandalay representative, June 4, 2017, Mandalay.
38. Author's interviews with CSO representatives 3 and 4, June 3, 2017, Mandalay; a representative of Magway EITI Watch Group, December 12, 2016, Magway; and MATA Magway representative 4, June 5, 2017, Magway.
39. Author's interviews with an NGO representative, November 25, 2016, Yangon; former MATA coordinator 1, November 22, 2016, Yangon; and a government representative, December 3, 2016, Bago.
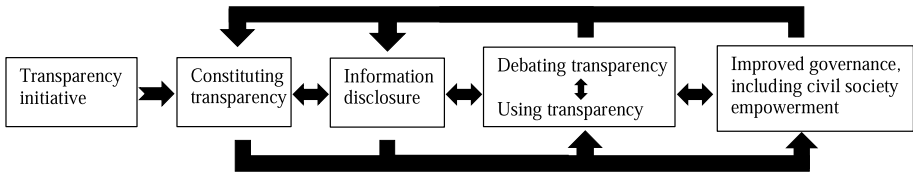
Figure 3
The Empowering Effects of Transparency Through Constituting, Using, and Debating Transparency

awareness, knowledge, capacity, coordination, and negotiation skills as well as trust and (accountability) relationships with other stakeholder groups. This, in turn, enhances their ability to demand, generate, and use information to communicate more effectively and hold responsible actors to account. Such feedback loops are important factors in explaining the reinforcing nature of transparency initiatives and their effects on civil society empowerment—factors that are overlooked in the transparency narrative (Figure 3).

These feedback loops are also important in considering the empowering effects of multistakeholder initiatives. Whereas literature on multistakeholder processes mostly focuses on civil society involvement in the decision-making process, the findings of this article suggest that civil society empowerment does not (only) happen in linear ways from one single process; rather, empowerment can also happen through processes of *debating* and *using* the outcomes of decision-making as well as the feedback loops between these processes.

The preceding findings have important methodological implications. In analyses of the (empowering) effects of transparency and multistakeholder initiatives, scholars would do well to focus not only on the effects of information disclosure but also on processes of debating, demanding, checking, and/or generating information and the feedback loops between these processes. Such an expanded focus blurs the conventional boundaries between information disclosers and information recipients, because both can be involved in, learn from, and build capacity through processes of debating, demanding, checking, and/or generating information (see also Gupta and Mason 2014). For example, although beyond the scope of this article, the government of Myanmar, in its efforts to gather and consolidate information for the EITI report, established coordination mechanisms to facilitate interministerial exchange of previously unavailable or inaccessible information. Also companies gain knowledge through the EITI process, mainly about (sustainability) standards, rules, and regulations for their business operations.[40] Assessments of the (empowering) effects of transparency and multistakeholder initiatives would therefore benefit from a focus on the

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40. Author's interviews with representative of a coal company 2 in EITI MSG Magway, December 12, 2016, Magway; and a representative of an international oil company in EITI MSG Magway, December 12, 2016, Magway.

role of and consequences for not only information recipients but also information disclosers.

The findings of this article have important policy implications. Disclosing information should not be considered as the first and most important step in transparency initiatives, as is often done; rather, considerations of how to constitute transparency in the first place as well as how to debate it deserve equal (if not more) attention. If countries are serious about enhancing accountability by means of transparency initiatives, they would do well to focus attention on not only *what* information to disclose but also *through what processes*. Also important in enhancing accountability are parallel reform processes, particularly in empowering those civil society actors that have limited resources and capacity to be involved in constituting or debating transparency or to use the disclosed information to hold others to account.

The findings of this article might suggest that the empowering effects of information disclosure alone are rather limited (see also Dingwerth and Eichinger 2010; Gupta 2010; Mol 2010). After all, the multistakeholder processes of constituting and debating transparency are not necessary features of transparency initiatives (Dingwerth and Eichinger 2010). An increasing number of transparency initiatives, however, recognize the relevance of multistakeholder processes through which transparency is constituted and debated. Also, the EITI standard itself seems to recognize not only the importance of multistakeholder processes but also the limited use of EITI reports, as shown by the additional requirements for MSGs to define plans for using disclosed information from the reports (Brockmyer 2016; EITI 2016a).

Even for transparency initiatives that only focus on information disclosure, however, an important message from this article is that the extent to which information empowers depends on how and by whom the information is produced. As I showed in the case of the EITI in Myanmar, a transfer of information from the government to the public through official outlets like the EITI report—also called proactive transparency—may have limited empowering effects. CSOs in Myanmar are more empowered through demanding and/or generating (region-)specific information that goes beyond such proactive transparency, also called demand-driven transparency (see also Brockmyer 2016; Fox 2007). This calls for a broader conceptualization of information disclosure in transparency initiatives to include not just the transfer of information from disclosers to recipients but also the exchange of information among stakeholders, including beyond official outlets.

Although the EITI in Myanmar represents a unique case of civil society empowerment, the EITI in Myanmar is not unique in having created (one of) the first opportunities for CSOs to be involved in the governance of the extractive industries sector (see, e.g., Ospanova et al. 2013; Rustad et al. 2017). Myanmar is also not the only country that draws on transparency during a state of democratic transition. Indeed, most countries that have committed to implementing the EITI have fledgling or poorly functioning democracies, often with long

histories of conflict and civic oppression (Epremian et al. 2016; Furstenberg 2015; Öge 2017; Sovacool and Andrews 2015). Analyses in such contexts present analytical challenges in assessing to what extent transparency initiatives—either through enhanced transparency or multistakeholder processes—catalyze rather than merely coincide with broader governance reform. This is particularly so in Myanmar, where the EITI is seen as a central part of the country's democratic reform process. Additional analyses of the processes through which transparency (dis)empowers civil society in other countries would therefore be welcome to review the findings in this article.

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