

22 August 2017

Federal Register Number: 2017-16287

TO: Department of State Desk Officer in the Office of Information and
Regulatory Affairs at the Office of Management and Budget (OMB)

FROM: Mennonite Central Committee U.S.

**RE: Emergency Submission Comment on “Request for Approval to Travel to a Restricted
Country or Area”**

As a humanitarian agency with a U.S. support base numbering in the hundreds of thousands, we write to express concern regarding proposed DPRK (North Korea) travel restrictions.

For nearly 100 years, and with offices in more than 50 countries, Mennonite Central Committee (MCC) has worked around the world to respond to basic needs and work for peace and justice in the name of Christ. MCC has worked in North Korea for the past 22 years, committing over \$22 million in assistance to orphanages, disaster response, elderly care centers, and tuberculosis and hepatitis care centers. Throughout these two decades, MCC staff from the U.S. and Canada have visited North Korea regularly to implement and monitor our projects without incident.

We have four major concerns about the DPRK travel restrictions:

1. The travel restrictions will create enormous obstacles for MCC to continue assisting vulnerable populations in North Korea. Without U.S. staff able to travel into DPRK, MCC will not be able to monitor and evaluate its humanitarian work, jeopardizing ongoing assistance and projects. In addition, with more resources dedicated to complying with tightening restrictions, fewer resources can be directed to assisting vulnerable people.
2. Because of MCC's focus on partnership with other DPRK-engaged peer agencies and ministries involving U.S. citizens, we are keenly aware of how the proposed restrictions will disrupt and, in some cases, even end their humanitarian efforts. This includes dedicated Americans who have been living inside North Korea, such as those caring for children with severe disabilities. The presence of these U.S. citizens has been a small but critical sign of hope for a new future between U.S. and North Korean people.

3. MCC's long experience in places of intense conflict, such as Vietnam during the war and Cambodia after the Khmer Rouge, has allowed MCC to pursue people-to-people exchanges in efforts to foster peace across divides. Especially during times of increased hostility, it is important to allow U.S. citizens the freedom to pursue alternatives to conflict through human interactions which are an expression of their religious faith. Banning travel to North Korea will decrease the impact of one of the most important resources the U.S. has for pursuing a future of peace and stability on the Korean Peninsula: human relationships.
4. One of our country's greatest values is allowing diverse expressions of belief and religious faith. This is the legal basis for citizens whose faith calls them to live out alternatives to war. There is an extensive U.S. tradition in which citizens with such convictions who – aware of the risks – have served in places of conflict and vulnerability and provided the presence of U.S. citizens who care about the poorest of the poor. This tradition has allowed MCC to be present as ambassadors of peace in difficult places. We urge humanitarian exceptions which will allow MCC and other U.S. agencies and ministries to continue such a presence in DPRK. Serving vulnerable populations in North Korea is important to MCC supporters in the U.S. and is an expression of their religious beliefs concerning welcoming the stranger and seeking peace between enemies.

For these reasons, we believe that restrictions on travel to DPRK undermine the chances for building a more positive future between the people of North Korea and the U.S. If such restrictions are implemented, MCC asks that, at a minimum, DOS-2017-0033 include clear and categorical exemptions for the following:

1. Humanitarian relief and assistance projects (organizations currently operating under General License No. 5 issued by the Department of Treasury – March 16, 2016);
2. Operations necessary for the retrieval/recovery of U.S. veterans' remains left in North Korea since the Korean War;
3. Korean American divided families that are meeting their family members through government-sanctioned reunion mechanisms;
4. Exchanges for purposes of cooperation in conflict reduction, citizen diplomacy, academics, professional fields of mutual interest such as healthcare, faith-based delegations and dialogues, as well as cultural and sports exchanges;
5. Journalists traveling to the region for reporting purposes.

MCC specifically requests that the language in the travel restrictions that reads as “justified by compelling humanitarian considerations,” be clarified to include those traveling to work on such humanitarian and assistance projects as outlined above.

People-to-people exchange has been a priority in MCC's efforts to pursue peace. The proposed North Korea travel restrictions not only limit these opportunities for exchanges, they also place an undue burden on humanitarian organizations such as ours. The absence of U.S. citizens engaged in humanitarian work in DPRK will close off some of the few remaining avenues for dialogue with North Koreans that could pave the way for future diplomacy.

We would welcome the opportunity to speak to you further regarding our work and the impact of our projects.

Sincerely,

A handwritten signature in black ink, appearing to read "J Ron Byler". The signature is stylized with a large initial "J" and a long horizontal stroke extending to the right.

J Ron Byler

Executive Director

Mennonite Central Committee U.S.

cc: Bureau of Consular Affairs, Passport Services Directorate