

Freedom on the Net 2024 - Cambodia

Key Developments, June 1, 2023 – May 31, 2024

Internet freedom in Cambodia declined during the coverage period as the government blocked independent news sites ahead of the July 2023 general election. During the coverage period, Cambodian authorities harassed, monitored, and arrested opposition members for their online activities ahead of and after the election. Ordinary internet users also faced arrest and harassment for their online activity, perpetuating an environment that is characterized by fear and self-censorship.

- In July 2023, a week before the general election, the government ordered the blocking of the news outlets Radio Free Asia (RFA) and Cambodia Daily, as well as Kamnotra, a database that tracks government activity and land disputes (see B1).
- In March 2023, RFA reported that the Cyber War Room, led by Prime Minister Hun Manet and established in 2013 to suppress government criticism and attack critics and political opponents of the government, was coordinating disinformation benefiting the ruling party on social media ahead of the July 2023 general election (see B5).
- In July 2023, the government enacted amendments to the election law to criminalize the encouragement of spoiling election ballots, a form of protest voting used by Candlelight Party supporters during the coverage period. Mass arrests followed (see C2).
- In February 2024, Chao Veasna, a Candlelight Party official, received a three-year prison sentence and fined six million riels (\$1,430) for incitement after he posted a photo on Facebook ahead of the July 2023 general election of his spoiled election ballot (see C3).
- In September 2023, a group of men severely beat and hospitalized Ny Nak, a prominent activist who had criticized a government report in a social media post (see C7).

Political Overview

Cambodia's political system has been dominated by the Cambodian People's Party (CPP) and Hun Sen for more than three decades. While the country conducted semicompetitive elections in the past, polls are now held in a severely repressive environment. The CPP-led government has maintained pressure on the opposition, independent press outlets, and demonstrators with intimidation, politically motivated prosecutions, and violence. Hun Manet succeeded his father, Hun Sen, as prime minister during the coverage period, though Hun Sen still wields significant influence.

A Obstacles to Access

A1 0-6 pts

Do infrastructural limitations restrict access to the internet or the speed and quality of internet connections?	4 / 6
---	--------------

Internet usage and smartphone adoption in Cambodia had been steadily increasing in recent years. But during this and the previous coverage period, official internet penetration rates decreased, potentially because of mobile registration requirements which no longer double-count individuals

using multiple phones or foreign travelers who stay in Cambodia for less than 60 days.¹ January 2024 reporting found Cambodia’s internet penetration stood at 56.7 percent, a 16 percent decline from the previous year.²

According to Ookla’s Speedtest Global Index, as of May 2024, Cambodia’s median mobile download speed was 26.24 megabits per second (Mbps) and the median mobile upload speed was 10.8 Mbps. The median fixed-line broadband download and upload speeds were 46.98 and 46.31 Mbps, respectively.³

Internet access, however, remains constrained by poor infrastructure. Nationwide power outages have posed challenges to telecommunications companies and imposed additional constraints on computer and internet use.⁴ From May 2023 through the end of the current coverage period, Électricité du Cambodge (EdC) has routinely cut power every month across parts of Phnom Penh and Kandal Province, often multiple times of a month, for two-to-four-day periods, with blackouts lasting four to eight hours per day.⁵ The planned power outages are part of scheduled maintenance work.⁶

There have been some efforts to improve infrastructure in recent years. In December 2020, the Ministry of Mines and Energy began rolling out a “smart-grid” electrical system in the last 10 percent of households in remote villages living without electricity.⁷ By the end of the coverage period, at least 300 households in Kampong Chhnang province, Svay Rieng province, Takeo province, and Kampong Speu province have been connected to the electrical system.⁸

Broadband internet services depend on fixed-line networks that are not as readily available in rural areas, thus inhibiting wider internet penetration. As a result, in 2018, internet service providers (ISPs) constructed two submarine fiber-optic internet networks connecting to high-speed international connections, the Malaysia-Cambodia-Thailand (MCT) cable and the Asia-Africa-Europe 1 (AAE-1) cable, covering over 23,000 miles.⁹ In February 2020, Telecom Cambodia signed a memorandum of understanding (MoU) with Cambodia Fiber-Optic Communication Network Co., Ltd. (CFOCN) to construct a metropolitan and regional fiber-optic backbone network.¹⁰

The Cambodian government has demonstrated a commitment to introduce 5G mobile technology.¹¹ Additionally, several mobile service providers have aimed to introduce 5G services, including Cellcard, Smart Axiata, and Metfone.¹²

A2 0-3 pts

Is access to the internet prohibitively expensive or beyond the reach of certain segments of the population for geographical, social, or other reasons?

1 / 3

While internet service remains relatively expensive in Cambodia, it has become more affordable over time. However, gender and rural-urban gaps in access persist.¹³

According to Cable, the average monthly cost of a fixed-line broadband subscription was \$28.13 in 2023,¹⁴ while the average cost of 1 gigabyte (GB) of mobile data was 12 cents. These costs are expensive for many Cambodians; the country’s poverty rate stood at 15.2 percent in 2022 per the UN Development Programme.¹⁵

Internet use also varies based on education. In December 2022, the Ministry of Posts and Telecommunications (MPTC) announced plans to launch 158 community technology centers across the country to benefit educators and students.¹⁶ As of the end of the coverage period, no information about the status of the project has been released.¹⁷

A3 0-6 pts

Does the government exercise technical or legal control over internet infrastructure for the purposes of restricting connectivity?

4 /
6

No government shutdowns of internet or mobile access have been documented in Cambodia, although broad provisions in the laws governing the telecommunications sector could provide the government with the power to do so.

Three operators constitute Cambodia's backbone network: Telecom Cambodia, Viettel Cambodia, and CFCN.¹⁸ These operators interconnect with smaller networks, allowing exchanges of information through Wi-Fi, local area network (LAN) lines, or other means. Telecom Cambodia operates under the jurisdiction of the MPTC and the Ministry of Economy and Finance.¹⁹

In February 2021, the government adopted the highly controversial subdecree on the Establishment of the National Internet Gateway (NIG subdecree). The NIG subdecree seeks to centralize the government's control over all incoming and outgoing domestic and international web traffic through a single internet gateway. The government-appointed NIG operators and regulatory authorities, specifically the MPTC and the Telecommunication Regulator Cambodia (TRC), were given monitoring powers.²⁰ Since the decree was adopted, civil society stakeholders have raised doubts regarding the government's capacity to implement its ambitious NIG at scale,²¹ and the MPTC in February 2022 announced a delay in its implementation.²² As of the end of the coverage period, there have been no further updates on the status of the NIG initiative.

Under Article 7 of the 2015 Law on Telecommunications, the MPTC or other relevant ministries have the authority to order telecommunications providers to "take necessary measures" in undefined circumstances of force majeure. The law separately established an enforcement body of "telecommunications inspection officials" to investigate alleged offenses under the law, with authority to call in support from the armed forces.²³ Under the law, these officials can temporarily suspend telecommunications firms' services and "suspend or fire their staff."²⁴

A4 0-6 pts

Are there legal, regulatory, or economic obstacles that restrict the diversity of service providers?

4 /
6

The telecommunications market has become increasingly competitive since it opened to private investment in 2006, although some obstacles restricting entry into the market persist.²⁵

As of 2021, according to the TRC, Metfone, Smart Axiata, and Cellcard served 90 percent of mobile users.²⁶ During the previous coverage period, Metfone reported having 10 million mobile subscribers,²⁷ Smart Axiata reported 8 million,²⁸ and Cellcard reported 4 million.²⁹

As of November 2022, there were 42 ISPs and 5 mobile service providers.³⁰ No ISPs had their licenses revoked or were fined during the current coverage period.

Previously, in October 2020, the MPTC suspended or revoked the licenses of 17 telecommunications operators for allegedly inaccurately reporting their revenue.³¹ In May 2021, the MPTC levied heavy tax penalties against Cambodian ISPs over purported miscalculation of tax revenues since 2017.³² In February 2022, the MPTC and the TRC suspended the license of King Technologies, which operates the ISP Opennet, and forbade them from signing up new customers over the company's purported failure to pay \$6.6 million owed to the government.³³

A5 0-4 pts

Do national regulatory bodies that oversee service providers and digital technology fail to operate in a free, fair, and independent manner?

0 /
4

Cambodia’s telecommunications regulator lacks independence, notably due to provisions contained in the 2015 Law on Telecommunications and the NIG subdecree.

The TRC is the main regulatory body for Cambodia’s telecommunications sector. Its objective is ostensibly to regulate the operations of telecommunications networks and services in order to “promote fair, efficient, and transparent competition” in Cambodia.³⁴ Although the TRC proclaims itself to be an autonomous public entity, the Law on Telecommunications significantly undermined its independence by granting the MPTC ultimate authority over the regulator in a relationship that lacks transparency.³⁵ The TRC’s lack of independence was demonstrated in the blocks of several news sites ahead of the July 2023 election (see B1).³⁶

B Limits on Content

B1 0-6 pts

Does the state block or filter, or compel service providers to block or filter, internet content, particularly material that is protected by international human rights standards?

3 /
6

Score Change: The score declined from 4 to 3 due to the blocking of independent news sites ahead of the July 2023 general election.

News and other websites are periodically blocked in Cambodia, particularly those that disseminate information that could be perceived as a threat to the ruling government. The NIG subdecree increases the risk that more websites and content will be blocked in the future (see A3 and B3), though it has yet to be implemented.

In July 2023, a week before the general election, the government blocked RFA and Cambodia Daily. The government also blocked access to Kamnotra, a database launched by the Cambodian Center for Independent Media (CCIM) that compiles public data on government decisions and land disputes.³⁷ The sites remained blocked through the end of the coverage period.³⁸ News outlets perceived as less critical of the government were not blocked ahead of the July 2023 elections.

During the previous coverage period, in February 2023, the TRC ordered ISPs to block the English- and Khmer-language news sites belonging to Voice of Democracy (VoD). The blocks came after then premier Hun Sen ordered the revocation of the license of VoD’s parent organization, the CCIM, effectively resulting in the outlet’s closure in Cambodia (see B2 and B6).³⁹

Social media platforms such as YouTube, Facebook, and X were freely available during the coverage period.⁴⁰ In June 2023, Hun Sen threatened to block Cambodians’ access to Facebook,⁴¹ but he retracted his statement that same day amid a backlash from users.⁴² The statements, issued ahead of the July 2023 elections, came after Meta’s Oversight Board recommended that his Facebook and Instagram accounts be suspended for six months for using language that could incite violence.⁴³

In September 2023, the Ministry of Agriculture, Forestry, and Fisheries (MAFF) issued a statement warning potential legal action—the “same outcome as VoD”—against the Cambodian Journalists Alliance Association (CamboJA) for a September 2023 report which detailed the assault of Ny Nak, a prominent government critic, and his wife. The MAFF called on CamboJA to “rectify these serious breaches of journalistic ethics” and “take steps to ensure that such malicious intentions and defamatory speculations do not recur in the future.”⁴⁴ CamboJA did not remove or edit the article, instead correcting a misspelling of a source’s name and adding another journalist who had worked on the piece to the byline (see B2).

Websites hosting pornography or sexually explicit images are subject to blocking in Cambodia under the Law on Suppression of Human Trafficking and Sexual Exploitation.⁴⁵ The government

banned online gambling in 2019, citing concerns that the industry was being used for criminal extortion.⁴⁶

B2 0-4 pts

Do state or nonstate actors employ legal, administrative, or other means to force publishers, content hosts, or digital platforms to delete content, particularly material that is protected by international human rights standards?

1 /
4

The amount of online content removed at the behest of state or nonstate actors remains difficult to assess, as the process is unofficial and nontransparent.

Content has previously been removed following government pressure or user complaints. In September 2023, the MAFF sought to pressure CamboJA over its report on the assault of a prominent government critic (see B1).⁴⁷ During the previous coverage period, in March 2023, the government threatened legal action against CamboJA's news site if it did not correct alleged misrepresentations in their reporting on the government's revocation of three Khmer-language news outlets' licenses earlier that month (see B6). CamboJA modified the article in response.⁴⁸

During the previous coverage period, in February 2023, the government revoked the media operating license of VoD's parent organization, the CCIM, effectively shutting down VoD—one of the country's last independent news outlets—and blocking its website over its reporting on Hun Manet's role in the government. Before the website was blocked (see B1), the platform publicly apologized and removed the article.⁴⁹

The government commonly arrests and forces individuals to make public apologies in lieu of criminal charges, a tactic it employs in response to dissent or opinions it considers unfavorable. In July 2023, Hun Sen called for members of a Telegram chat group named "Sabai," which had reportedly promoted the spoiling of ballots, to publicly apologize or else face legal action (see C3).⁵⁰ Five people linked to Sabai subsequently did so, including Candlelight Party activist Thach Chea Chantha, who promised to politically affiliate with the CPP.

In August 2023, military authorities sued two online journalists for defamation after they reported on the pollution of a public lake by military personnel. After they were threatened with legal action, the journalists removed the article; the complaint was subsequently withdrawn.⁵¹

B3 0-4 pts

Do restrictions on the internet and digital content lack transparency, proportionality to the stated aims, or an independent appeals process?

1 /
4

The government's restrictions on internet content lack transparency, are vaguely defined, and lack adequate judicial oversight. The MPTC can order ISPs to block websites at the request of other government departments. Implementation of censorship is nontransparent, apparently based on informal communications between government officials and service providers. There is limited avenue for appeal.

The NIG subdecree, adopted in February 2021, grants the government sweeping powers to restrict and block access to digital content, though it has not been implemented (see A3). Under the decree, NIG operators are obligated to collaborate with the MPTC to block or disconnect network connections that affect "safety, social order, dignity, culture, or traditions." If NIG operators or ISPs fail to comply with these broad conditions, they could incur a range of steep financial penalties and even have their licenses suspended or revoked.⁵² The MPTC announced a delay to implementation in February 2022, citing potential traffic disruptions and the ongoing COVID-19 pandemic; the delay was announced amid questions over whether the government possessed the necessary technical capacity to implement its plan. Questions persist over whether the government could realistically enact the NIG plan, though the NIG subdecree has not been rescinded.⁵³

In February 2020, the Ministry of Information (MoI) confirmed that a government “commission” monitors Cambodian media, including social media platforms. The commission operates under the legal authorization of a May 2018 interministerial *Prakas* (Proclamation) on Website and Social Media Control. If the commission deems online content to be unfit for publication or to contain false information, it will either force the publisher to remove the post or take legal action.

In September 2022, the MoI announced that it would apply greater scrutiny to online publications’ journalistic ethics, dissemination of information that is considered false, and organizational structure and scale when issuing media licenses.⁵⁴ Several news outlets have already had licenses revoked (see B2). In August 2019, the government threatened to revoke the licenses of or shut down online news outlets purportedly spreading false information that threatened national security.⁵⁵ Those that the government deems violate their license conditions can be ordered to remove offending content or post corrections.

In September 2022, the Ministry of Women’s Affairs (MoWA) announced plans to develop a social media code of ethics to curb the posting of “provocative” and “immoral” images and videos by online users, particularly women. The MoWA’s plans for implementation were not released by the end of the coverage period.

In April 2020, the Ministry of Culture and Fine Arts created the Disciplinary and Accolade Council to track “illicit content” online. ⁵⁶

B4 0-4 pts

Do online journalists, commentators, and ordinary users practice self-censorship?	1 / 4
--	--------------

Self-censorship online among journalists, activists, CSOs, unionists, and ordinary users is widespread and has reportedly increased in recent years. A clampdown on civil society has created an environment in which CSOs have increasingly self-censored, restricted, or even completely ceased their activities online.

Journalists have avoided reporting on sensitive issues including Hun Sen and his son, Prime Minister Hun Manet, land disputes, corruption, drug trafficking, and political issues due to increased online surveillance, legal action, harassment, and intimidation by authorities (see C3 and C7).⁵⁷

A March 2022 CCIM survey of journalists and media outlets found that 72 percent of respondents were concerned with reporting on political issues, 64 percent were concerned about reporting on human rights abuses, and 61 percent were concerned about reporting on impunity cases.⁵⁸ Additionally, 64 percent of respondents reported that they practiced self-censorship due to the political environment.⁵⁹

In a survey conducted by the Cambodian Center for Human Rights (CCHR), which covered 2023 and was released in January 2024, 36 percent of respondents reported that they felt free to speak on social media,⁶⁰ with the organization noting that figure having fallen over several years. Some 23 percent said they “always” or “regularly” avoided saying what they wanted to in public or online for fear of retaliation.⁶¹

B5 0-4 pts

Are online sources of information controlled or manipulated by the government or other powerful actors to advance a particular political interest?	2 / 4
---	--------------

The spread of disinformation and misinformation on social media, including by the government, its allies, and other political actors,⁶² has been a growing concern in recent years.

In March 2023, RFA reported that the CPP’s Hun Manet–led Cyber War Room, established in 2013 to suppress government criticism and attack critical and opposition voices, was coordinating pro-CPP disinformation on social media ahead of the July 2023 general election.⁶³

In September 2023, the government adopted a subdecree establishing a National Committee for Coordinating Information and Public Opinion Coordination, responsible for monitoring and regulating purportedly false information and promoting a “positive image” and the “prestige” of Cambodia. That same month, the CCIM voiced concerns that the committee could exacerbate the government’s practice of removing government criticism from the internet under “fake news” regulations.⁶⁴

Former premier Hun Sen, who has maintained a large Facebook following, has previously been accused of manipulating his page to create an exaggerated perception of his popularity.⁶⁵ Hun Sen often used his account to post threats of physical attacks and legal action against his critics (see C7).⁶⁶

B6 0-3 pts

Are there economic or regulatory constraints that negatively affect users’ ability to publish content online?

2 / 3

Although economic and regulatory constraints generally do not prevent the publication of online content, a number of media outlets with an online presence have shut down due to high taxes. Separately, online outlets are required to obtain licenses.

During the previous coverage period, in February 2023, the MoI revoked the media operating license of VoD’s parent organization for allegedly violating journalistic ethics (see B2).⁶⁷ The government’s highly politicized decision was strongly condemned by domestic and international CSOs.⁶⁸ In March 2023, the MoI revoked the media licenses of three Khmer-language media outlets—the Federation of Cambodia–ASEAN Journalists, Raksmei Kampong Cham, and Dumming Knongh Srok—for alleged ethics violations. Their reporting related to allegations that a government official had forged documents and engaged in extortion, all related to a land dispute.⁶⁹

In March 2022, the MoI revoked the media licenses of three news outlets that primarily operated online, the Bayong Times, KCTV, and Cambodia Today, following reporting on government corruption.⁷⁰

B7 0-4 pts

Does the online information landscape lack diversity and reliability?

2 / 4

The diversity of the online environment is undermined by the government’s censorship of critical voices and independent media.

During the coverage period, ahead of the July 2023 general election, the government ordered the blocking of RFA and Cambodia Daily, as well as Kamnotra, a database which monitors and compiles government decisions and new legislation (see B1). During the previous coverage period, in February and March 2023, the government revoked the licenses of the CCIM and three Khmer-language news sites (see B6).

The effective lack of independent media outlets has affected the diversity of content online, and has increased self-censorship (see B1, B4, and B6).⁷¹ Media ownership is highly concentrated, and several major media outlets are affiliated with the ruling CPP. Still, Facebook, CamboJA News, and the *Southeast Asia Globe* remained available during the coverage period and are popular sources of news for Cambodians.⁷²

The internet has become one of the main sources of news and information for Cambodians, and social media has allowed the proliferation of more diverse content that is free from government influence.⁷³ However, misinformation about the political opposition frequently spreads online. Ahead of the July 2023 general election, the CPP’s Cyber War Room reportedly spread pro-CPP disinformation and harassed opposition-group members and supporters, further suppressing diverse political speech online (see B5).

The presence of misinformation in Cambodia likely acutely impacts Indigenous communities, in part due to limited digital literacy and a lack of reliable information in Indigenous languages.⁷⁴
B8 0-6 pts

Do conditions impede users’ ability to mobilize, form communities, and campaign, particularly on political and social issues?

4 / 6

Amid heightened restrictions on freedom of assembly, communities, CSOs, and activists have turned to petition websites and social media, particularly Facebook, as platforms for advocacy and to organize assemblies. However, repressive laws, arrests, prosecutions, and increased harassment around digital campaigns have undermined the use of the internet for mobilization (see C2, C3, C5, and C7).

In July 2023, amendments to the election law were signed into effect; those amendments criminalize the encouragement of spoiling election ballots, a form of protest voting used by Candlelight Party supporters during the coverage period, and mass arrests followed (see B2 and C3).

Still, in recent years users have mobilized through social media and online petitions to draw attention to issues including the electoral process, environmental justice, and gender equality.⁷⁵ In March 2024, the UN Children’s Fund office in Cambodia launched a digital campaign to protect children against online sexual exploitation.⁷⁶

During the previous coverage period, CSOs drafted several joint statements, open letters, and recommendations to the government on a range of issues, including the revocation of VoD’s license,⁷⁷ gender-based violence against women journalists,⁷⁸ and freedom of expression more broadly.⁷⁹

C Violations of User Rights

C1 0-6 pts

Do the constitution or other laws fail to protect rights such as freedom of expression, access to information, and press freedom, including on the internet, and are they enforced by a judiciary that lacks independence?

1 / 6

Although some articles in the constitution guarantee freedom of expression, constitutional amendments passed in 2018 undermine these rights, and the legal framework imposes significant restrictions on press freedom and freedom of expression, including online.⁸⁰

Amendments to the constitution and the criminal code⁸¹ adopted in February 2018 restrict fundamental freedoms, including freedom of expression online.⁸² In particular, amendments to Articles 42 and 49 of the constitution state that individuals and political parties should only conduct activities that uphold Cambodia’s “national interest.”⁸³ The broad, vague wording of the amendments leaves them open to abuse, as any legitimate online discourse could be deemed unconstitutional if it ostensibly impacts the national interest.

In April 2020, the government passed the Law on the Management of the Nation in the State of Emergency to respond to the COVID-19 pandemic. This law empowers the government to monitor information online, ban or restrict news and media sharing, and implement other measures it deems necessary.⁸⁴

A 2019 draft Law on Access to Information⁸⁵ contained protections for whistleblowers and had the potential to positively impact free expression online if approved and enforced. However, an updated draft released in August 2019 raised concerns about the law’s adherence to international human rights standards,⁸⁶ as well as its use of broad and unclear standards that could threaten access of information and freedom of expression.⁸⁷ For example, the law narrowly defines the type of information and institutions it applies to; lacks effective oversight procedures; permits public authorities to deny disclosure in various overly broad situations; and contains a criminal libel and defamation provision.⁸⁸ According to a January 2024 CamboJA report, the MoI was reviewing the draft law, which was previously expected to be passed by 2025.⁸⁹

In January 2021, the General Commissariat of the National Police issued a directive barring journalists from filming, recording, or live-streaming ongoing police investigations and other duties performed by the police.⁹⁰ If journalists are found to be in violation of this decree, authorities can take legal action against them under the Press Law. Three days before this directive was established, the information minister threatened journalists who took photos and covered news related to authorities in “prohibited areas.”⁹¹ The new directive is vaguely worded and open to broad interpretation, whereby journalists could be arrested for undertaking legitimate reporting and investigative activities.

Other directives have been presented in provinces outside of Phnom Penh. In November 2021, Kampot governor Mao Thonin ordered the provincial information department to increase its monitoring of journalists. Journalists were also required to report to that department before reporting on issues within Kampot. Following public outcry, the information minister called the directive “wrong” and warned that it may violate Article 40 of the constitution.⁹²

C2 0-4 pts

Are there laws that assign criminal penalties or civil liability for online activities, particularly those that are protected under international human rights standards?

1 / 4

While free-expression protections are enshrined in the constitution, expression is nonetheless threatened by provisions of Cambodian law, notably under parts of the criminal code.⁹³

Recently passed laws and pending legislation impose a range of civil liability and criminal penalties. The NIG subdecree—which has gone unimplemented after the government elected to delay its existing plans in 2022 (see A3)—imposes hefty financial penalties and media license suspension on NIG operators or ISPs who fail to comply with any of the stipulated provisions (see A3 and B3). Fines range from 50 million (\$11,940) to 100 million riels (\$23,890) for individuals, and from 500 million riels (\$119,440) to one billion riels (\$238,890) for legal entities. The NIG subdecree also includes a vague catch-all penalty clause, which subjects any natural or legal person to punishment under “applicable laws” for committing offenses that “affect national security, social order, or national revenue.”⁹⁴ While the final version of the NIG subdecree added a judicial appeal process, CSOs have noted that the Cambodian judiciary lacks independence.⁹⁵

In July 2023, King Norodom Sihamoni issued a royal decree signing amendments to the election law into effect, including amendments to Article 142 which criminalizes the disruption of the electoral process by any means, including online. Under the amendment, individuals who supported the Candlelight Party by discouraging voter registration and inciting eligible voters to spoil their ballots could face fines of 5 to 20 million riels (\$1,190 to \$4,780).⁹⁶ While voters possess the right to spoil ballots or boycott elections as a form of protest in both international human rights standards and in Cambodian constitutional law, the Law on the Amendment of the Election Law (LAEL)

imposes fines of 5 million riels (\$1,194) to 20 million riels (\$4,777), bans on election candidacy, and imprisonment for activists who use social media to promote the spoiling of ballots.⁹⁷

In August 2020, the government released the draft Law on Public Order, which restricts freedom of expression online by prohibiting the use of writing, images, and other content on social media that endangers national tradition and dignity.⁹⁸ The draft law targets women and LGBT+ people by criminalizing wearing clothes that are “too short” or “revealing” in public spaces, including online spaces. Individuals can be fined 100,000 riels (\$23.88) to 500,000 riels (\$119) and imprisoned from one to six days for engaging in prohibited activities.⁹⁹ The bill had not been passed by the end of the coverage period.

The latest draft of the Law on Cybercrime, which the government aims to enact by the end of 2024, criminalizes a range of online speech, including defamation, insults, and technology-related abuse; rights groups have warned of its potential to further limit online free expression in Cambodia.¹⁰⁰ Under Article 42 of the draft legislation, individuals who intimidate, threaten, or abuse people using technology-facilitated means can face fines of up to five million riels (\$1,190) and sentences of up to six months in prison. Additionally, those who cause “grievous harm to the victim” can face fines of up to 10 million riels (\$2,390) and sentences of up to two years in prison. Under Articles 43 and 44, defamation and insults are criminalized with fines up to 10 million riels (\$2,390), and in the case of “serious harm to the victim,” fines up to 20 million riels (\$4,780) and sentences of up to six months in prison. Under Article 49, the dissemination and distribution of false information that “intentionally harms national defense, national security, relations with other countries, economy, public order, or causes discrimination, or affects traditional culture,” is criminalized with fines up to 100 million riels (\$23,890) and sentences ranging from three to five years in prison.¹⁰¹

Under Article 495 of the criminal code, individuals can be arrested for incitement to disturb public order or affecting the dignity of individuals and public officials—a broadly worded provision that can be used to prosecute online critics of the government.¹⁰² Articles 305 and 307,¹⁰³ which govern defamation and public insult respectively, are frequently used against those engaged in online discourse. Under the criminal code, individuals can also be prosecuted in connection with written documents or pictures that are released online unintentionally or without their consent.¹⁰⁴ Those convicted for defamation or public insult can be fined up to 10 million riels (\$2,390).¹⁰⁵

Defamation by media outlets, which is covered in the 1995 Press Law, is punishable with a fine of between 1 million (\$238) and 5 million riels (\$1,194), and outlets convicted must publish a retraction.¹⁰⁶ People can face prison time in connection with online expression under a variety of criminal charges including forgery, which carries a penalty of up to 10 years’ imprisonment, and incitement to disturb social security or discriminate against a person or group, punishable by up to two and three years in prison, respectively.¹⁰⁷ Different articles of the criminal code also include charges for “plotting,” “defamation,” “falsifying information,” and “incitement to commit a felony.”¹⁰⁸

A 2018 amendment to the criminal code introduced a lèse-majesté offense (Article 437) that criminalizes defamation of, insults of, and threats against the king. The crime is punishable by between one and five years in prison and a fine of 2 million (\$477) to 10 million riels (\$2,390). It also applies to media outlets carrying allegedly insulting content.

The 2015 Law on Telecommunications further increased government control over the information and communication technologies (ICT) sector and threatened the rights to privacy and freedom of expression. Articles 80 and 81 punish the “establishment, installation, and utilization of equipment in the telecommunications sector” leading to “national insecurity” with 7 to 15 years in prison and fines ranging from 140 million riels (\$33,444) to 300 million riels (\$71,665). Under Articles 95 and 96, using telecommunications to threaten to damage property can result in a prison sentence of up to six months and fines ranging from one million riels (\$239) to 40 million riels (\$9,555).¹⁰⁹

The 2015 Law on Associations and Non-Governmental Organizations (LANGO) contains provisions—including Article 24, which requires CSOs to act neutrally toward political parties—that have the potential to restrict freedom of expression, including online.

Article 1 of the current Press Law “assures freedom of the press and freedom of publication in conformity with Articles 31 and 41 of the constitution,” but the law does not explicitly cover online media. The law also allows civil action against broadly defined activities; for example, it restricts content that does not promote “the good custom of society” under Article 14,¹¹⁰ violations of which can incur a fine of between 1 million riels (\$239) to 5 million riels (\$1,194).¹¹¹

Article 11 of the March 2021 Law on Measures to Prevent the Spread of COVID-19 and Other Severe and Dangerous Contagious Diseases¹¹² imposes a prison sentence of up to five years and a fine of up to 20 million riels (\$4,780) for “intentionally obstructing” the implementation of COVID-19 measures. Though Article 11 does not explicitly restrict online freedoms, authorities have used this provision to target and silence online speech relating to COVID-19 and vaccines (see C3).¹¹³

C3 0-6 pts

Are individuals penalized for online activities, particularly those that are protected under international human rights standards?

2 / 6

Prosecutions for online speech continued as the government targeted dissenting voices in the political opposition and among the general public, as well as human rights defenders and journalists.¹¹⁴ Authorities continued to arrest and prosecute Candlelight Party and former Cambodia National Rescue Party (CNRP) members en masse for their online activities. In July 2023, during that month’s electoral period, the CCHR’s Fundamental Freedoms Monitoring Project counted 42 people, most of them affiliated with the Candlelight Party, who faced charges under Article 142 of the LAEL (see C2); that legislation criminalizes incitement of others to spoil ballots or boycott a poll.¹¹⁵ That same month, the Phnom Penh Municipal Election Committee tried 21 opposition activists who live overseas in absentia, after CPP lawyers filed a complaint over Facebook posts which allegedly incited ballot spoiling.¹¹⁶

In February 2024, Chao Veasna, a Candlelight Party official, was sentenced to three years in prison and fined six million riels (\$1,430) for incitement after he posted a photo on Facebook in July 2023 of his spoiled election ballot.¹¹⁷ In July 2023, Lor Thorn, vice president of the Candlelight Party’s Pailin Province chapter, was arrested over his alleged connection to a Telegram group that advocated for ballot-spoiling.¹¹⁸ Thorn claimed he was detained without a warrant and was only released after contractually agreeing to refrain from attacking the government going forward. In July 2023, Candlelight Party official Khem Monykosal, along with three other party members and activists, were fined 10 million riels (\$2,390) each and banned from campaigning for 10 days for their posts on social media encouraging others to spoil their ballots.¹¹⁹

In February 2024, the CPP filed a lawsuit against Soeng Senkaruna, a spokesperson for the Cambodian Human Rights and Development Association, for two billion riels (\$500,000) in damages; it accused Senkaruna of providing a defamatory quote for the US-based Cambodia Daily Khmer.¹²⁰

In October 2023, the Phnom Penh Court of First Instance convicted 12 former CNRP political leaders and officials under charges of “conspiracy and incitement to cause serious social unrest” in relation to a Facebook post in 2021 which criticized government leaders for delaying debt repayments during the COVID-19 pandemic.¹²¹ Four leading CNRP figures received eight-year prison terms in absentia. Voeung Samnang, who was in detention in Cambodia at the time of conviction, was sentenced to six years in prison.

Internet users also faced arrests and convictions for their online activity. In July 2023, authorities arrested Kang Saron, a man from Banteay Meanchey Province, after he criticized immigration

policy, drug use in Cambodia, and government corruption on a Facebook Live broadcast.¹²² He was bailed 10 days later and in November 2023 was sentenced to three years in prison on charges of defamation, inciting a CPP official, and lèse-majesté.¹²³ That same month, a court detained Svay Sophat, a local journalist in Kampong Speu Province, after he questioned the king over the issue of voter turnout on Facebook Live.¹²⁴

In July 2023, Phi Ouk, a 35-year-old woman, was arrested on insult and incitement charges after she posted on TikTok claiming to be “the Mother of God, the Creator of the world and the whole earth,” and that in her position, she knew that “[Prime Minister] Hun Manet ha[d] done a lot of bad things the past.”¹²⁵ In August 2023, military authorities sued two journalists from news sites RSE-News and Newnetwork for defamation and alleged incitement after reporting on a military official, Yann Sovann; the official had polluted a public lake, largely used by Indigenous people, to pave way for the development of a resort. After Sovann threatened the journalists with legal action, they removed the article and Sovann withdrew the complaint (see C3).¹²⁶

In January 2023, police arrested Ny Nak, a government critic, on charges of incitement and defamation after he criticized the Ministry of Commerce in a Facebook comment.¹²⁷ In January 2024, Ny Nak was arrested over December 2023 Facebook comments criticizing the government’s decision to give land to Labor Minister Heng Sour; Ny Nak was accused of intent to discriminate and incitement. Later in January 2024, Ny Nak’s wife commented that his health had declined.¹²⁸

During the previous coverage period, in December 2022, 36 former opposition members received sentences from the Phnom Penh Municipal Court for plotting against the government; their convictions were based in part on their Facebook posts.¹²⁹ Of the four members who were in Cambodia, three received five-year sentences.¹³⁰ In a June 2022 trial, 50 people received five-to-eight-year terms; the trial reportedly dealt with social media comments critical of the government.¹³¹

Authorities have also charged users under the lèse-majesté amendment of 2018 to Article 437 of the criminal code. In March 2023, opposition activists Yim Sinorn was arrested on charges of insulting the king after he posted on Facebook questioning Norodom Sihamoni’s power and implying he serves more as a figurehead.¹³² He was released a week later after posted a video apology to the king from prison and retracted his statement. In April 2023, he announced his allegiance to the CPP and joined the ruling party.¹³³

C4 0-4 pts

Does the government place restrictions on anonymous communication or encryption?

3 / 4

Encryption technology is freely available. There are some limits on anonymous communication.

The authorities have cracked down on retailers who failed to register SIM card owners since 2017.¹³⁴ The 2015 Regulation on Cell Phone Data threatens suspensions and fines for mobile service providers who do not register the identities of customers.¹³⁵ The regulation obliges companies to supply police with identification details of SIM card holders on request.¹³⁶ In May 2022, Cambodia recorded over 19 million registered SIM cards.¹³⁷

In February 2023, the government issued a new subdecree mandating the implementation of a new SIM card registration system and the registration of all devices which use SIM cards, barring those used by foreign travelers for less than 60 days.¹³⁸

Responding to heightened surveillance, Cambodians have increasingly turned to encrypted applications such as WhatsApp to communicate. Government officials also increasingly use encrypted applications.¹³⁹ However, under the NIG subdecree (see A3), if implemented, ISPs will be required to make users complete online forms with accurate, identifiable information, including names and birthdates, thus undermining anonymous communication.¹⁴⁰

Does state surveillance of internet activities infringe on users' right to privacy? | 2 / 6

The government monitors residents' publicly visible activity online and extralegally surveils private communications, despite the existence of some legal safeguards.

Article 97 of the 2015 Law on Telecommunications criminalizes eavesdropping by private individuals but permits secret surveillance with approval from an undefined "legitimate authority." The law includes no legal or procedural safeguards and appears to authorize undeclared monitoring of "any private speech via telecommunications."¹⁴¹ The passing of the NIG subdecree theoretically allows for the government's unfettered surveillance of individuals' online activity, but the extent to which this law will be implemented is not yet known (see A3 and B3).

Under the draft Law on Cybercrime, authorities can seize computer systems, access user data, and retain a copy of the data when collecting evidence while conducting criminal investigations (see C2 and C6). The draft criminalizes the "deni[al] [of] access to computer data to any person entitled to it," with sentences ranging from six months to three years in prison and fines ranging from 5 million (\$1,190) to 15 million (\$3,580) riels.¹⁴²

Telecommunications users' expectation of privacy—particularly in an electoral context—might be infringed, based on a series of arrests during the 2023 electoral period that relied on ill-defined charges, which themselves rested on telephone activity. In June 2023, two Candlelight Party commune councilors were arrested on incitement charges, allegedly over comments made during a telephone conversation (see C3 and C7).¹⁴³

In recent years, authorities have stated on numerous occasions that they were monitoring online content.¹⁴⁴ In 2017, the National Police announced that it was monitoring Facebook to detect and deter "rebel movements against the government."¹⁴⁵ The 2018 interministerial Prakas on Website and Social Media Control gives extensive surveillance powers to the government and mandates that the MPTC, the MoI, and the Ministry of Interior form a special unit to effectively "police" social media, ostensibly to fight against purportedly false news (see B3).¹⁴⁶ In October 2019, the Ministry of Interior's information technology department announced plans to create a Security Operation Center, which it said would monitor online threats on all digital platforms.¹⁴⁷ In January 2021, the MoI announced its intention to increase monitoring of TikTok and private communications platforms, including WhatsApp, Telegram, and Messenger.¹⁴⁸

In September 2021, the Ministry of Interior and Chinese law enforcement officials agreed to form an "anti-crime plan" whereby Beijing would provide the National Police with equipment, including biometric surveillance technology.¹⁴⁹ In April 2024, Beijing and Phnom Penh signed an agreement for continued law enforcement cooperation.¹⁵⁰

C6 0-6 pts

Does monitoring and collection of user data by service providers and other technology companies infringe on users' right to privacy?

1 / 6

Service providers are required to provide communication information to the government, though this process lacks judicial oversight. Article 6 of the 2015 Law on Telecommunications mandates that all telecommunications operators provide ICT service data to the MPTC.¹⁵¹ There is no requirement for a judicial warrant or other safeguards, and the law places no limits on how long data can be stored.¹⁵²

The NIG subdecree contains a catch-all clause requiring NIG operators to maintain technical records, lists of internet protocol (IP) addresses, and internet traffic records, though it has yet to be implemented (see A3, B3, and C2). Under this clause, bulk data must be collected and maintained

with no clear purpose.¹⁵³ One source reported that ISPs are struggling to identify affordable options for storing the bulk data required by the subdecree.¹⁵⁴

The draft Law on Cybercrime obliges all ISPs to record and retain the computer and traffic data of internet users for a minimum of 180 days—with the potential for an additional 180-day extension—and obliges ISPs to provide the user-identifiable data upon request from the competent authorities (see C2 and C5). Noncompliance can result in sentences ranging from one to six months in prison and fines ranging from 10 million riels (\$2,390) to 20 million riels (\$4,780).¹⁵⁵

The interministerial Prakas on Website and Social Media Control also obliges ISPs to “install software programs and equip internet surveillance tools to easily filter and block any social media accounts or pages” deemed illegal.¹⁵⁶ The Prakas does not provide for any right to challenge a decision taken pursuant to its mandates, nor does it provide for judicial recourse for users whose rights are negatively affected by its implementation.¹⁵⁷

C7 0-5 pts

Are individuals subject to extralegal intimidation or physical violence by state authorities or any other actor in relation to their online activities?

2 /
5

Journalists, activists, and individuals, especially women and members of the LGBT+ community, face increasing harassment,¹⁵⁸ smear campaigns, and violence in Cambodia, sometimes instigated by state officials. According to CamboJA’s annual *Cambodian Journalism Situation Report*, there were at least 32 cases of harassment against 59 journalists in 2023.¹⁵⁹

Physical attacks against activists were also reported during the coverage period. In September 2023, a group of men severely beat and hospitalized Ny Nak, a prominent activist who, the day before, had posted on Facebook criticizing a report published by the Ministry of Agriculture (see B1 and B2).¹⁶⁰ In November 2023, authorities reportedly threatened to shoot Soy Sat, a 72-year-old monk, after he posted a message on Facebook about his plans to march on International Human Rights Day.¹⁶¹

Online harassment is increasingly common in Cambodia, and Hun Sen frequently posted threats to members of the political opposition and government critics on Facebook (see B5). In February 2024, Hun Sen threatened a Facebook user, Shang Hai Heng, who had posted on Facebook about Hun Sen’s ability to weaponize the law to target the opposition.¹⁶² In January 2023, Hun Sen issued a warning against his political opponents on a Facebook live, threatening to “gather CPP people to protest and beat [them] up” and send people to their home.¹⁶³

In June 2023, after a popular CPP-affiliated social media commentator threatened to “cut off” the head of US-based journalist Taing Sarada “with an axe,” for being a “national traitor,” Sarada reported that a stranger knocked on his door in Washington, DC and a car remained outside his house for several hours.¹⁶⁴ During the previous coverage period, in January 2023, the editor in chief of BTN Media was reportedly pushed into a canal by a military officer who owned a sand-dredging site; the journalist was reporting on the impact of sand dredging on nearby rice fields.¹⁶⁵ CamboJA reported that in August 2022, the car of a Penh Chet Media journalist was shot by an unknown assailant after the journalist published an article on illegal cockfighting; the journalist alleged that authorities may have been involved in the activity.¹⁶⁶

C8 0-3 pts

Are websites, governmental and private entities, service providers, or individual users subject to widespread hacking and other forms of cyberattack?

2 /
3

Government bodies, private entities, and government officials were subject to technical attacks during the coverage period. The social media accounts of activists, human rights organizations, and media outlets have been reportedly hacked in recent years.¹⁶⁷

In September 2023, the Facebook pages of two state media outlets, the General Department of National Television in Cambodia and Radio National of Kampuchea, were briefly hacked.¹⁶⁸

In November 2023, threat intelligence company Paulo Alto's Unit 42 reported that two hacking groups, one linked to the Chinese Ministry of State Security and another to a government contractor, were targeting at least 24 Cambodian government bodies and were specifically focused on cloud services.¹⁶⁹ According to the report, the Ministry of Defense was among those targeted, leaving classified government information exposed.¹⁷⁰ The researchers believed that the attacks were part of a long-term espionage effort.

In May 2023, the website of Cambodia Angkor Air faced a distributed-denial-of-service (DDoS) attack, temporarily halting its online services.¹⁷¹

Footnotes

- 1 James Whitehead, "TRC tightens control on SIM card vendors," Khmer Times, May 10, 2024, <https://www.khmertimeskh.com/501485835/trc-tightens-control-on-sim-card...>; Sub-Decree No. 193 on the Implementation of the Identification Registration System for SIM Card Users: <https://opendevelopmentcambodia.net/news/sub-decree-mandates-implemanta...>
- 2 Simon Kemp, "Digital 2024: Cambodia," Data Reportal, February 23, 2024 <https://datareportal.com/reports/digital-2024-cambodia>.
- 3 Ookla, "Speedtest Global Index: Cambodia's Mobile and Broadband Speeds," accessed May 31, 2024, <https://www.speedtest.net/global-index/cambodia>.
- 4 Poovenraj Kanagaraj, "Demand for data with upcoming 5G rollout may see price increases," Khmer Times, January 27, 2020, <https://www.khmertimeskh.com/50683844/demand-for-data-with-upcoming-5g-....>
- 5 "EDC," Khmer Times, accessed May 31, 2024, <https://www.khmertimeskh.com/tag/edc/>.
- 6 "Khmer Times. Rolling power outages in Phnom Penh and Kandal through Sunday," January 20, 2024, <https://www.khmertimeskh.com/501426089/rolling-power-outages-in-phnom-p....>
- 7 Buth Sela, "Village first to get 'smart grid' in Kampong Chhnang province," Khmer Times, December 23, 2020 <https://www.khmertimeskh.com/50796286/village-first-to-get-smart-grid-i....>
- 8 "Projects," Okra Solar, accessed May 31, 2024, <https://www.okrasolar.com/projects>.
- 9 Sok Chan, "Number of internet users up this year," Khmer Times, December 7, 2018, <https://www.khmertimeskh.com/557066/number-of-internet-users-up-this-ye....>
- 10 May Kunmakara, "Telecom Cambodia, CFOCN sign fiber optic network deal" Phnom Penh Post, February 12, 2020 <https://www.phnompenhpost.com/business/telecom-cambodia-cfocn-sign-fibr....>
- 11 See e.g. "Press Release: Officials from Ministry of Posts and Telecommunications of Cambodia joined 5G Training held in Beijing, aiming to speed up Cambodia 5G launch in 2020," Khmer Times, January 13, 2020 <https://www.khmertimeskh.com/50679345/officials-from-ministry-of-posts-....>
Thou Vireak, "Metfone to use Huawei's 5G technology for network," Phnom Penh Post, August 27, 2019, <https://www.phnompenhpost.com/business/metfone-use-huaweis-5g-technolog...>; "MPT Minister Announces Upcoming 5G Launch for Cambodia," Telecom Review, March 14, 2024, <https://www.telecomreviewasia.com/news/industry-news/4067-mpt-minister-....>
- 12 See e.g., Shaun Turton, "Cambodia joins the 5G race despite concerns over cost and viability," Nikkei Asia, May 20, 2019, <https://s.nikkei.com/2Elc0qT>; □ Sok Chan, "Cellcard ready to upgrade infrastructure to 5G," Khmer Times, October 4, 2018, <https://www.khmertimeskh.com/539136/cellcard-ready-to-upgrade-infrastru...>; Shaun Turton, "Huawei extends Asia dominance with Cambodia 5G rollout," Nikkei Asia, April 26, 2019, <https://asia.nikkei.com/Business/Technology/Huawei-extends->

- Asia-dominan...; “Internet users in Cambodia near 16M,” Bangkok Post, July 26, 2020, <https://www.bangkokpost.com/business/1719527/internet-users-in-cambodia...>; May Kunmakara, “Ministry: 5G essential for Cambodia’s digitalization,” Phnom Penh Post, February 27, 2020, <https://www.phnompenhpost.com/business/ministry-5g-essential-cambodias-....>
- 13 Asia Foundation, “Mobile Phones and Internet Use in Cambodia 2016,” December 2016, <https://asiafoundation.org/publication/mobile-phones-internet-use-cambo...>; Simon Kemp “Digital 2023: Cambodia”, February 13, 2023, <https://datareportal.com/reports/digital-2023-cambodia>.
 - 14 “Global broadband pricing league table 2023,” Cable, accessed July 13, 2023, <https://www.cable.co.uk/broadband/pricing/worldwide-comparison/>.
 - 15 “UNDP Launches 2022 Economic and Social Impact Assessment of COVID-19 and War in Ukraine on Cambodia,” UNDP, November 23, 2022, <https://www.undp.org/cambodia/press-releases/undp-launches-2022-economi....>
 - 16 Manoj Mathew, “Government to launch Community Tech Centres to boost digital literacy,” Khmer Times, December 2022, <https://www.khmertimeskh.com/501200557/government-to-launch-community-t....>
 - 17 Ry Sochan. Telecommunications ministry reiterates plans for 558 tech centres. The Phnom Penh Post. 05 August 2023, <https://www.phnompenhpost.com/national/telecommunications-ministry-reit...>
 - 18 Ministry of Post and Telecommunications (MPTC), “Fact Sheet: Telecommunication Sector,” December 2015, <https://www.mptc.gov.kh/public/article/2847>.
 - 19 World Bank, “Cambodia Services Trade: Performance and Regulatory Framework Assessment,” July 2014, <http://documents.worldbank.org/curated/en/806791468015647474/pdf/912430....>
 - 20 CCHR, “Joint statement – CSOs call on the Royal Government of Cambodia to repeal the sub-decree on the establishment of the National Internet Gateway”, February 19, 2021, https://cchrcambodia.org/media/files/press_release/801_jscne_en.pdf
 - 21 Fiona Kelliher, “Cambodia’s internet gateway debut leaves analysts in the dark,” Southeast Asia Globe. 15 February 2022, <https://southeastasiaglobe.com/cambodias-internet-gateway-leaves-analys....>
 - 22 Sebastian Stangio, “Cambodia Puts Controversial National Internet Gateway Plan on Hold,” The Diplomat, February 16, 2022 <https://thediplomat.com/2022/02/cambodia-puts-controversial-national-in....>
 - 23 Cambodian League for the Promotion and Defense of Human Rights (LICADHO), “Cambodia’s Law on Telecommunications: A Legal Analysis,” March 2016, <https://www.licadho-cambodia.org/reports.php?perm=214>.
 - 24 LICADHO, “Cambodia’s Law on Telecommunications: A Legal Analysis,” March 2016, <https://www.licadho-cambodia.org/reports.php?perm=214>.
 - 25 World Bank, “Cambodia Services Trade: Performance and Regulatory Framework Assessment,” July 2014, <http://documents.worldbank.org/curated/en/806791468015647474/pdf/912430....>
 - 26 Business 2 Business Cambodia, “Telcos and Mobile Devices in Cambodia,” March 25, 2023, <https://www.b2b-cambodia.com/articles/telcos-and-mobile-devices-in-camb....>
 - 27 Metfone, “Why Chose Metfone,” accessed May 23, 2023, <https://www.metfone.com.kh/en>.
 - 28 Smart Axiata, “About Smart,” accessed May 23, 2023, <https://www.smart.com.kh/more/corporate-information/about-smart/>.
 - 29 CellCard, “About CellCard,” accessed May 23, 2023, <https://www.cellcard.com.kh/en/about-us/>.
 - 30 TRC, “Licenses,” accessed May 23, 2023, <https://www.trc.gov.kh/licenses/>.
 - 31 See e.g., Khorn Savi, “National Police orders closure of online gambling operations” Phnom Penh Post, June 28, 2020, <https://www.phnompenhpost.com/national/national-police-orders-closure-o...>; Vaughan O’Grady, “Cambodian ministry penalises 17 operators” Developing Telecoms, October 26, 2020, <https://www.developingtelecoms.com/telecom-business/telecom-regulation/...>;

- Sok Chan, “Telecoms operators have their licences revoked” Khmer Times, October 21, 2020, <https://www.khmertimeskh.com/50775084/telecoms-operators-have-their-lic...>;
- Khmer Times, “Six online gaming sites blocked by Cambodian authorities, July 1, 2020, <https://www.khmertimeskh.com/50739956/six-online-gaming-sites-blocked-b...>
- 32Husain Haider, “Netizens could end up paying fines dating back years: ISPs”, Khmer Times, May 5, 2021 <https://www.khmertimeskh.com/50851318/netizens-could-end-up-paying-fine...>
 - 33Meng Seavmey, “Government Bans Opennet from Taking on New Customers over \$6.6 Million Debt,” Cambodianess, February 22, 2022 <https://cambodianess.com/article/government-bans-opennet-from-taking-on...>
 - 34TRC, “About Us: Background,” accessed January 21, 2020, <https://www.trc.gov.kh/about-us/background/>.
 - 35Sithi, “Law on Telecommunications,” accessed September 20, 2020, http://www.sithi.org/temp.php?url=law_detail.php&lg=&id=277.
 - 36Cambodian Journalists Alliance Association, “Government advances censorship of critical news sites in the lead-up to national elections,” July 18, 2023, <https://www.camboja.net/government-advances-censorship-of-critical-news...>;
 - Jack Brook, “Cambodia internet providers told to block independent broadcaster,” Asia Nikkei, February 20, 2023, Cambodia internet providers told to block independent broadcaster - Nikkei Asia.
 - 37Lors Liblib and Noeurn Davin, “Cambodian Government Blocks News Sites Before Unopposed Election,” Voice of America, July 21, 2023, <https://www.voacambodia.com/amp/cambodian-government-blocks-news-sites-...>
 - 38Open Observatory of Network Interference Explorer, “Cambodia,” accessed May 31, 2024, https://explorer.ooni.org/chart/mat?probe_cc=KH&since=2023-08-04&until=...
 - 39“Cambodia: Hun Sen Extinguishes Media Freedom,” Human Rights Watch, February 14, 2023, <https://www.hrw.org/news/2023/02/14/cambodia-hun-sen-extinguishes-media...>
 - 40Simon Kemp, “Digital 2023: Cambodia,” February 13, 2023 <https://datareportal.com/reports/digital-2023-cambodia>.
 - 41Joel Guinto, “Cambodia PM threatens Facebook ban after posts ruled violent,” BBC, June 30, 2023, <https://www.bbc.com/news/world-asia-66062752>.
 - 42Fiona Kelliher, “Cambodia PM backtracks on threat to ban Facebook amid content row,” Al Jazeera, July 1, 2023, <https://www.aljazeera.com/news/2023/7/1/cambodia-pm-backtracks-on-threa...>
 - 43Grant Peck and Sopheng Cheng, “Oversight board recommends Facebook suspend Cambodian premier’s account for violent language,” Associated Press, June 29, 2023, <https://apnews.com/article/hun-sen-facebook-violence-speech-meta-instag...>
 - 44Sebastian Strangio. Cambodian Ministry Threatens Independent Media Outlet With Closure. 19 September 2023. The Diplomat. <https://thediplomat.com/2023/09/cambodian-ministry-threatens-independen...>
 - 45Michael Dickison, “Ministry Seeking to Curb Sexual Images Online,” Cambodia Daily, October 25, 2016, <https://english.cambodiadaily.com/news/ministry-seeking-curb-sexual-ima...>
 - 46Prak Chan Thul, “Thousands lose jobs, casinos shut as Cambodia bans online gambling,” Reuters, December 31, 2019, <https://www.reuters.com/article/us-cambodia-gambling/thousands-lose-job...>
 - 47Sebastian Strangio, Cambodian Ministry Threatens Independent Media Outlet With Closure, The Diplomat, 19 September 2023, <https://thediplomat.com/2023/09/cambodian-ministry-threatens-independen...>
 - 48Son Minea, “CamboJa in trouble for misreporting Info Ministry’s decision-making,” Khmer Times, March 21, 2023, <https://www.khmertimeskh.com/501258640/camboja-in-trouble-for-misreport...>
 - 49Ry Sochan, “VOD’s media license revoked,” Phnom Penh Post, February 13, 2023, <https://www.phnompenhpost.com/national/vods-media-licence-revoked>; Luke Hunt, “Cambodian PM shuts independent news outlet,” Union of Catholic Asian News,

February 13, 2023, <https://www.ucanews.com/news/cambodian-pm-shuts-independent-news-outlet...>

- 50Sovann Sreypich and Eung Sea, “Three Candlelight Party Leaders Arrested of Spoiled Ballots, “Sabai” Telegram Chat Members Spared Following Public Apologies,” CamboJA, July 25, 2023, <https://cambojanews.com/three-candlelight-leaders-arrested-over-spoiled...>
- 51CamboJA, “Journalism Situation in Cambodia: Quarterly Monitoring Report,” October 18, 2023, <https://www.camboja.net/wp-content/uploads/2023/10/Quarterly-Report-Jul...>
- 52HRW, “Cambodia: Internet Censorship, Control Expanded,” February 18, 2021, <https://www.hrw.org/news/2021/02/18/cambodia-internet-censorship-contro...>
- 53Sebastian Strangio, “Cambodia Puts Controversial National Internet Gateway Plan on Hold,” The Diplomat, February 16, 2022, <https://thediplomat.com/2022/02/cambodia-puts-controversial-national-in...>
- 54Chhun Sunly, “MoI to restrict issuing online media licences,” Khmer Times, September 2, 2022, <https://www.khmertimeskh.com/501143344/moi-to-restrict-issuing-online-m...>
- 55Ly Livsier, “Ministry to Revoke Licenses of Media over Fake News,” Khmer Times, August 13, 2019, <https://www.khmertimeskh.com/632885/ministry-to-revoke-licences-of-medi...>; Sheith Khidhir, “Fake News from Cambodia's Government?,” ASEAN Post, August 19, 2019, <https://theaseanpost.com/article/fake-news-cambodias-government>
- 56Sen David, “Online Seller Makes Public Apology for 'Sexy' Selling Techniques,” Khmer Times, February 20, 2020, <https://www.khmertimeskh.com/50692775/online-seller-makes-public-apolog...>
- 57Ly Livsier, “Ministry to Revoke Licenses of Media over Fake News.” Khmer Times, August 13, 2019. <https://www.khmertimeskh.com/632885/ministry-to-revoke-licences-of-medi...>
- 58Cambodian Center for Independent Media, “Challenges for Independent Media in Cambodia 2021,” accessed March 15, 2022, p. 12 https://ccimcambodia.org/wp-content/uploads/2022/03/CCIM_Challenges-for...
- 59Ibid. p. 13.
- 60“Cambodia Fundamental Freedoms Monitor: 2023 Annual Report,” Cambodian Center for Human Rights (CCHR), accessed May 31, 2024, <https://cchrcambodia.org/en/publications/general-reports/cambodia-funda...>
- 61Ibid.
- 62“Industrialized Disinformation: 2020 Global Inventory of Organised Social Media Manipulation,” Oxford Internet Institute (OII), accessed May 31, 2022, <https://demtech.oii.ox.ac.uk/wp-content/uploads/sites/127/2021/02/Cyber...>
- 63Neou Vannarin, “ក្រុមវាយប្រហារតាមអ៊ីនធឺណិតបក្សកាន់អំណាចកំពុងពង្រឹងសកម្មភាពតាមអ្នកបង្កបង្កាបមតិវិវាទ,” Radio Free Asia, July 3, 2023, <https://www.rfa.org/khmer/news/human-rights/cyber-attack-groups-are-int...>; Samuel Wooley, “Some of the Worst Troll Armies Are Gaining Ground. Just Look at Cambodia,” New York Times, July 11, 2023, <https://www.nytimes.com/2023/07/11/opinion/cambodia-elections-hun-sen-h...>; Ben Paviour, “Members Confirm CPP-Linked ‘Cyber War Room,’” The Cambodia Daily, May 26, 2017, <https://english.cambodiadaily.com/editors-choice/members-confirm-cpp-li...>
- 64Phon Sothyroth, “Government Forms Committee to Monitor Public Opinion and Promote Positive Image of Cambodia,” CamboJA, September 7, 2023, <https://cambojanews.com/government-forms-committee-to-monitor-public-op...>
- 65Ben Paviour and Kuch Naren, “Live From Facebook, It’s Prime Minister Hun Sen,” Cambodia Daily, June 21, 2016, <https://english.cambodiadaily.com/editors-choice/live-from-facebook-its...>; “Office of the Council of Ministers,” Office of the Council of Ministers, accessed October 1, 2020, <http://pressocm.gov.kh/en>; Daniel Nass and Shaun Turton, “Only 20 per cent of PM’s recent Facebook ‘Likes’ from Cambodia,” Phnom Penh Post, March 9, 2016, <https://www.phnompenhpost.com/national/only-20-cent-pms-recent-facebook...>

- 66Matthew Ingram, “An election in Cambodia exposes Facebook’s shortcomings (again),” Columbia Journalism Review, July 27, 2023, https://www.cjr.org/the_media_today/cambodia_hun_sen_facebook.php.
- 67Ry Sochan, “VOD’s media license revoked, Phnom Penh Post, February 13, 2023, <https://www.phnompenhpost.com/national/vods-media-licence-revoked>.
- 68“RSF joins press freedom and civil society organisations in condemning Cambodian government’s decision to revoke independent media VOD’s licence,” Reporters Without Borders, July 24, 2023, <https://rsf.org/en/rsf-joins-press-freedom-and-civil-society-organisati....>
- 69Khuon Narim, “Information Ministry Revokes Three Media Licenses Following Reports on Senior Official’s Role in Land Fraud,” Cambodian Journalist Alliance Association, March 2023, <https://cambojanews.com/information-ministry-revokes-three-media-licens....>
- 70
- 71“Cambodia: Controlling election reporting guidelines released, “International Federation of Journalists (IFJ),” June 2018, <https://www.ifj.org/media-centre/news/detail/category/human-rights/arti...>; Pech Sotheary, “Report: Media Freedom ‘Collapsed,’” Khmer Times, February 22, 2018, <https://www.khmertimeskh.com/109746/report-media-freedom-collapsed/>; “Cambodia: The Independent Press in Ruins,” Reporters Without Borders, February 2018, <https://rsf.org/en/news/rsf-publishes-report-media-freedom-under-attack....>
- 72David Hutt, “The Truth About Hun Sen and the Media in Cambodia,” Diplomat, January 30, 2020, <https://thediplomat.com/2020/01/the-truth-about-hun-sen-and-the-media-i....>
- 73Paul Millar, “How leaks, lies, and fake news took over politics,” Southeast Asia Globe, March 7, 2017, <https://southeastasiaglobe.com/the-tangled-web-how-leaks-lies-and-fake-....>
- 74Tuy Engly, “Cambodia’s Indigenous Peoples Struggle with Digital Literacy on Eve of the Elections”, CamboJA News, 01 March 2023, <https://cambojanews.com/cambodias-indigenous-peoples-struggle-with-digi....>
- 75“Phnom Tamao Forest Saved from Developers,” Wildlife Alliance, accessed on July 14, 2023, <https://www.wildlifealliance.org/phnom-tamao-forest-saved/>; “Five Journalists, Four Activists Detained at Phnom Tamao Forest,” Licadho, August 16, 2022, <https://www.licadho-cambodia.org/flashnews.php?perm=318>; CCHR, “Joint Statement: Authorities must immediately stop using violence and arbitrary application of laws against peaceful women strikers,” February 2022, <https://cchrcambodia.org/en/publications/project/press-releases/protect....>
- 76“Online Campaign to protect children and adolescents from online sexual exploitation,” UNICEF Cambodia, March 21, 2024, <https://www.unicef.org/cambodia/press-releases/unicef-cambodia-launches....>
- 77“CSOs Joint Statement: Media and civil society groups deeply disturbed by government’s decision to revoke VOD’s media license and the sexual harassment of a female reporter,” Sithi, February 13 2023, <https://sithi.org/publications/2023-02-14-joint-statement-media-and-civ....>
- 78“Request to take immediate action against Mr. Pheng Vannak, Director of Pheng Vannak News for using misogynistic language and verbal harassment against a women journalist,” Twitter, February 14, 2023, <https://twitter.com/cchrcambodia/status/1625665895363416064/photo/1>.
- 79“Joint Statement World Press Freedom Day,” Sithi, May 2, 2023, <https://www.sithi.org/publications/2023-05-02-joint-statement-world-pre....>
- 80Constitutional Council of the Kingdom of Cambodia, Decision No. 092/003/2007, July 10, 2007; □ Constitution of the Kingdom of Cambodia, Unofficial Translation Supervised by the Constitutional Council, March 2010, <https://www.wipo.int/edocs/lexdocs/laws/en/kh/kh009en.pdf>; □ “Draft Penal Code Amendment related to Lèse-majesté and Constitutional Amendments Promulgated,” Fresh News, March 3, 2018, <http://en.freshnewsasia.com/index.php/en/7748-2018-03-03-05-59-30.html>.

- 81 Andrew Nachemson and Mech Dara, “Updated: Lèse Majesté Law Among Changes to Cambodia’s Constitution and Penal Code,” Phnom Penh Post, February 2, 2018, <https://www.phnompenhpost.com/national-politics/updated-lese-majeste-la...>
- 82 Niem Chheng and Andrew Nachemson, “Lèse majesté law now in effect,” Phnom Penh Post, March 5, 2018, <https://www.phnompenhpost.com/national-politics/lese-majeste-law-now-ef...>
- 64 “Joint Statement: Organizations call for outright rejection of draft amendments to the Constitution and Criminal Code,” ASEAN Parliamentarians for Human Rights, February 21, 2018, <https://aseanmp.org/2018/02/21/joint-statement-outright-rejection-of-dr...>; “UN experts say constitutional changes in Cambodia impinge on democracy,” Office of the UN High Commissioner for Human Rights (OHCHR), February 2018, <https://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=22674...>
- 83 “Draft Penal Code Amendment related to Lèse-majesté and Constitutional Amendments Promulgated,” Fresh News, March 3, 2018, <http://en.freshnewsasia.com/index.php/en/7748-2018-03-03-05-59-30.html>.
- 84 Randle DeFalco, “Opportunism, COVID-19, and Cambodia’s State of Emergency Law,” Just Security, August 3, 2020, <https://www.justsecurity.org/71194/opportunism-covid-19-and-cambodias-s...>
- 85 Daphne Chen, “Draft of long-awaited access-to-information law unveiled,” Phnom Penh Post, February 1, 2018, <https://www.phnompenhpost.com/national/draft-long-awaited-access-inform...>
- 86 “Cambodia: Access to Information Bill Falls Short,” Human Rights Watch (HRW), December 2019, www.hrw.org/news/2019/12/11/cambodia-access-information-bill-falls-short.
- 87 “Cambodia: Analysis of the Draft Law on Access to Information,” Article 19, December 10, 2019, www.article19.org/resources/cambodia-analysis-of-the-draft-law-on-acces...
- 88 Ibid.
- 89 Seoung Nimol, “Ministry of Information Finalizing Protracted Access to Information Draft Law,” CamboJA News, January 24, 2024, <https://cambojanews.com/ministry-of-information-finalizing-protracted-a...>
- 90 See e.g., Buth Reaksmeay Kongkea, “Journalists barred from filming or recording police investigations,” Khmer Times, January 25, 2021, <https://www.khmertimeskh.com/50806487/journalists-barred-from-filming-o...>; Khy Sovuthy, “Reporters remain unclear on scope of police powers in new directive on interference by media,” Camboja, February 6, 2021, <https://cambojanews.com/reporters-remain-unclear-on-scope-of-police-pow...>
- 91 “Open Letter: Journalists Call on Government to Clarify Latest Directive to the Press,” Overseas Press Club of Cambodia, “February 5, 2021, <https://opc-cambodia.org/blog/2021/02/05/open-letter-journalists-call-o...>
- 92 Sun Narin and Meas Molika, “Provincial Governor in Cambodia Knocked for Plan to Combat ‘Nonsense News,’” VOA, December 3, 2021, <https://www.voacambodia.com/a/provincial-governor-in-cambodia-knocked-f...>
- 93 “Cambodia: New Penal Code Undercuts Free Speech,” Human Rights Watch (HRW), December 2010, <https://www.hrw.org/news/2010/12/23/cambodia-new-penal-code-undercuts-f...>
- 94 Sub-Decree on the Establishment of a National Internet Gateway, Article 17 (2021)
- 95 HRW, “Cambodia: Internet Censorship, Control Expanded,” February 18, 2021, <https://www.hrw.org/news/2021/02/18/cambodia-internet-censorship-contro...>
- 96 “King promulgates amended election law,” The Phnom Penh Post, July 5, 2023, <https://www.phnompenhpost.com/national/king-promulgates-amended-electio...>
- 97 Hang Punreay, “King issues decree ratifying newly amended election law,” Khmer Times, July 6, 2023, <https://www.khmertimeskh.com/501319530/king-issues-decree-ratifying-new...>; “Cambodian lawmakers approve changes to election law that disqualify candidates who don’t vote,” AP News, June 23, 2023, <https://apnews.com/article/cambodia-election-law-amendment-opposition-7...>
- 98 “Joint Statement: Draft Law on Public Order Violates Women’s Rights: Discard Draft, Stop Blaming Survivors of Violence,” CCHR, August 27,

- 2020, https://cchrcambodia.org/media/files/press_release/774_jsodpodlgfe_en.p...
- 99“Joint Statement: Civil Society Organizations for the Draft Law on Public Order to be Immediately Discarded,” Human Rights Watch (HRW), August 13, 2020, https://www.hrw.org/sites/default/files/media_2020/08/200813%20CSO%20Jo...
 - 100Fiona Kelliher and Sun Narin, “Experts fear Cambodian cybercrime law could aid crackdown,” Voice of America, April 8, 2024, <https://www.voanews.com/a/experts-fear-cambodian-cybercrime-law-could-a...>
 - 101“Law on Cybercrime,” Kingdom of Cambodia, accessed May 31, 2024.
 - 102“Cambodia: New Penal Code Undercuts Free Speech,” Human Rights Watch, December 2010, <https://www.hrw.org/news/2010/12/23/cambodia-new-penal-code-undercuts-f...>
 - 103Kingdom of Cambodia, “Criminal Code of the Kingdom of Cambodia, Khmer–English translation,” NGOCEDAW, January 2014, http://ngocedaw.org/wp-content/uploads/2015/05/Criminal_Code_EN-KH_Jan_....
 - 104CCHR, “Digital Wrongs? An Overview of the Situation of Digital Rights in Cambodia,” February 2016, https://cchrcambodia.org/index_old.php?url=media/media.php&p=analysis_d...
 - 105Kingdom of Cambodia, “Criminal Code of the Kingdom of Cambodia, Khmer–English translation,” NGOCEDAW, January 2014, http://ngocedaw.org/wp-content/uploads/2015/05/Criminal_Code_EN-KH_Jan_....
 - 106World Trade Organization (WTO), “The Compendium of Cambodian Laws, Volume II: Law on the Press,” July 1995, https://www.wto.org/english/thewto_e/acc_e/khm_e/WTACCKHM3A3_LEG_36.pdf.
 - 107Cambodian Criminal Code, Articles 495, 496, and 629 <https://www.ajne.org/sites/default/files/resource/laws/7195/criminal-co...>
 - 108CCHR, “Fundamental Freedoms Snapshot on “Online Expression in Cambodia,”” Accessed October 2, 2020, <https://cchrcambodia.org/admin/media/newsletter/newsletter/english/2-Sn...>
 - 109“Law on Telecommunications,” Telecommunication Regulator of Cambodia, November 30, 2015, <https://trc.gov.kh/wp-content/uploads/law/law-on-telecommunications.pdf>.
 - 110CCHR, “Fact Sheet: The Law on the Press 1995,” September 2011, <https://cchrcambodia.org/admin/media/factsheet/factsheet/english/CCHR%2....>
 - 111“Law on the Press (1995),” Sithi, accessed October 2, 2020, http://sithi.org/temp.php?url=law_detail.php&lg=&id=75; [http://sithi.org/admin/upload/law/Law%20on%20the%20Press%20\(1995\).ENG.p...](http://sithi.org/admin/upload/law/Law%20on%20the%20Press%20(1995).ENG.p...)
 - 112“Cambodia: Scrap Abusive Covid-19 Prevention Bill,” Human Rights Watch, March 5, 2021, <https://www.hrw.org/news/2021/03/05/cambodia-scrap-abusive-covid-19-pre...>
 - 113Khuth Sokun, “Man arrested for posting video forbidding workers to vaccinate against Chinese COVID-19,” Voice of Democracy, March 24, 2021, <https://vodkhmer.news/2021/03/24/man-arrested-in-connection-with-chines....>
 - 114See, e.g., “Briefing | A Legal Brief on Cambodia’s Covid-19 Law Used to Persecute Human Rights Defenders and Other Activists,” LICADHO, September 2022, <https://www.licadho-cambodia.org/reports.php?perm=238>.
 - 115“Cambodia Fundamental Freedoms Monitor: 2023 Annual Report,” CCHR, accessed May 31, 2024, <https://cchrcambodia.org/en/publications/general-reports/cambodia-funda...>
 - 116Khuon Narim, “21 Opposition Activists Overseas Fined, Banned From Running for Office for 20 years,” CamboJA, July 26, 2023, <https://cambojanews.com/21-opposition-activists-overseas-fined-banned-f...>
 - 117“Cambodian activist who spoiled election ballot sentenced to 3 years,” RFA Khmer, February 7, 2024, <https://www.rfa.org/english/news/cambodia/spoiled-ballot-sentence-02072....>
 - 118Sovann Sreypich and Eung Sea, “Three Candlelight Party Leaders Arrested of Spoiled Ballots, “Sabai” Telegram Chat Members Spared Following Public Apologies,”

- CamboJA, July 25, 2023, <https://cambojanews.com/three-candlelight-leaders-arrested-over-spoiled...>
- 119Khuon Narim, “NEC Upholds Convictions Against Opposition Members for Inciting Spoiled Ballots,” CamboJA, July 27, 2023, <https://cambojanews.com/nec-upholds-convictions-against-opposition-memb...>
 - 120Teng Yalirozy, “Right Groups Hope for Fair Court Resolution on ADHOC’s Spokesman Lawsuit,” Cambodianess, February 6, 2024, <https://cambodianess.com/article/right-groups-hope-for-fair-court-resol...>
 - 121Tin Zakaria, “Phnom Penh Municipal Court Sentences 12 Opposition Activists and Leaders to 5 – 8 Years in Prison for Conspiracy and Incitement,” RFA, October 25, 2023, <https://www.rfa.org/khmer/news/politics/phnom-penh-municipal-court-sent...>
 - 122Yang Chandara, “Wife of a man who critisized Hun Sen’s regime on Facebook demands her husband’s release,” RFA Khmer, July 7, 2023, <https://www.rfa.org/khmer/news/law/the-wife-of-a-detainee-who-criticize...>
 - 123“Cambodian man gets 3 years for Facebook post critical of the government,” RFA Khmer, November 22, 2023, <https://www.rfa.org/english/news/cambodia/facebook-comments-sentence-11...>
 - 124Kim Yutharo, “Kompong Speu reporter in detention for ‘lese-majeste,’” Phnom Penh Post, July 25, 2023, <https://www.phnompenhpost.com/national/kampong-speu-reporter-detention-....>
 - 125Buth Reaksmeay Kongkea, “Woman in court for ‘insulting’ Mr Hun Manet,” Khmer Times, August 2, 2023, <https://www.khmertimeskh.com/501335352/woman-in-court-for-insulting-mr-....>
 - 126“Journalism Situation in Cambodia: Quarterly Monitoring Report,” CamboJA, October 18, 2023, <https://www.camboja.net/wp-content/uploads/2023/10/Quarterly-Report-Jul...>
 - 127“Critic faces charges after mocking government on Facebook,” RFA Khmer, January 5, 2024, <https://www.rfa.org/english/news/cambodia/critic-charged-facebook-01052...>
 - 128“Cambodia: Dissident Arrested After Criticizing Minister,” Human Rights Watch, January 24, 2024, <https://www.hrw.org/news/2024/01/24/cambodia-dissident-arrested-after-c....>
 - 129“Court Convicts 36 Former Opposition Activists in Latest Mass Trial,” LICADHO, December 22, 2022, <https://www.licadho-cambodia.org/articles/20221222/179/index.html>.
 - 130ស៊ិន សារ៉ាត, “អតីតមេដឹកនាំ និងសកម្មជនCNRPជិត៤០នាក់ត្រូវបានផ្ដន្ទាទោសឱ្យជាប់ពន្ធនាគាររហូតដល់៧ឆ្នាំពីបទ «រួមគំនិតក្សត្រ»,” CamboJa News, December 23, 2022, <https://khmer.cambojanews.com/dozens-of-cnrp-leaders-and-activists-sent...>
 - 131“Court Convicts At Least 51 in CNRP Mass Trial,” LICADHO, June 14, 2022, <https://www.licadho-cambodia.org/articles/20220614/176/index.html>.
 - 132“Opposition activists arrested in Phnom Penh after online comments about king,” March 21, 2023, <https://www.rfa.org/english/news/cambodia/opposition-arrests-facebook-k...>; “Cambodian activists charged with insulting king on Facebook,” Al Jazeera, March 23, 2023, <https://www.aljazeera.com/news/2023/3/23/cambodians-held-on-rare-royal-....>
 - 133“Top opposition party youth leader switches allegiance to Hun Sen’s ruling party,” Radio Free Asia, April 21, 2023, <https://www.rfa.org/english/news/cambodia/opposition-defector-042120231...>
 - 134Khy Sovuthy, “Police Hail First Arrest in Unregistered SIM Card Crackdown,” Cambodia Daily, February 22, 2017, <https://english.cambodiadaily.com/news/police-hail-first-arrest-in-unre...>
 - 135Khy Sovuthy and Aisha Down, “Telecoms Ministry Promises Punishment for Non-Registration of Phone Users,” Cambodia Daily, November 2, 2016, <https://english.cambodiadaily.com/business/telecoms-ministry-promises-p...>
 - 136“Digital Wrongs? An Overview of the Situation of Digital Rights in Cambodia,” CCHR, February 2016, https://cchrcambodia.org/index_old.php?url=media/media.php&p=analysis_d...
 - 137Ibid.

- 138Yuth Vireak, “Sub-decree mandates implementation of mobile SIM registration system,” Phnom Penh Post, March 10, 2023, <https://www.phnompenhpost.com/national/sub-decree-mandates-implementation...>
- 139Alex Willemyns and Mech Dara, “In a digital age, government turns to Telegram for communication,” Phnom Penh Post, August 10, 2017, <https://www.phnompenhpost.com/national-post-depth-politics/digital-age-....>
- 140Reuters Staff, “Cambodia’s new China-style internet gateway decried as repression tool”, Reuters, February 18, 2021, <https://www.reuters.com/article/us-cambodia-internet/cambodias-new-chin....>
- 141LICADHO, “Cambodia's Law on Telecommunications: A Legal Analysis,” March 2016, <https://www.licadho-cambodia.org/reports.php?perm=214>.
- 142Law on Cybercrime, Kingdom of Cambodia, accessed May 31, 2024.
- 143Khuon Narim and Hel Komsan, “Two Candlelight Commune Councillors Arrested in Tbong Khmum Province,” CamboJA, June 9, 2023, <https://cambojanews.com/two-candlelight-commune-councilors-arrested-in-....>
- 144Ben Sokhean and Ben Paviour, “Government To Monitor Sam Rainsy’s Facebook Page,” Cambodia Daily, August 1, 2017, <https://english.cambodiadaily.com/news/government-to-monitor-sam-rainsy....>
- 145Mech Dara, “Cambodia’s Facebook crackdown: Police are monitoring site for ‘enemies’ and ‘rebel movements,’” Phnom Penh Post, July 25, 2017, <https://www.phnompenhpost.com/national/cambodias-facebook-crackdown-pol....>; Kong Meta and Daphne Chen, “Defence Ministry monitoring Facebook for feedback,” Phnom Penh Post, February 14, 2018, <https://www.phnompenhpost.com/national/defence-ministry-monitoring-face....>
- 146Mech Dara and Hor Kimsay, “Three ministries set up web-monitoring group to look out for ‘fake news,’” Phnom Penh Post, June 7, 2018, <https://www.phnompenhpost.com/national/three-ministries-set-web-monitor....>
- 147Khuon Narim, “Planned security centre raises rights concerns over internet surveillance,” Khmer Times, October 10, 2019, <https://www.khmertimeskh.com/50649622/planned-security-centre-raises-ri....>
- 148Cambodia Daily, “Cambodia expands monitoring of ‘fake news’,” Cambodia Daily, January 29, 2021, <https://english.cambodiadaily.com/news/cambodia-expands-monitoring-of-f....>
- 149Oun Chheng Por, “Chinese police share intelligence and tracking technology with Cambodia and help build National Police headquarters,” VOA, September 29, 2021, <https://khmer.voanews.com/a/new-deal-sees-china-build-cambodia-s-police....>
- 150“Cambodia, China sign law enforcement work plan,” Phnom Penh Post, May 1, 2023, <https://www.phnompenhpost.com/national/cambodia-china-sign-law-enforcem....>
- 151“Law on Telecommunications,” Sithi, January 27, 2016, http://sithi.org/temp.php?url=law_detail.php&lg=&id=277.
- 152“Cambodia's Law on Telecommunications: A Legal Analysis,” Licadho, March 2016, <https://www.licadho-cambodia.org/reports.php?perm=214>.
- 153“Joint Statement: Discard the Sub-Decree on the Establishment of the National Internet Gateway, set to detrimentally impact human rights online in Cambodia,” PEN International, February 18, 2021, <https://pen-international.org/news/discard-sub-decree-establishment-nat....>
- 154Fiona Kelliher, “Cambodia’s internet gateway debut leaves analysts in the dark,” Southeast Asia Globe, February 15, 2022, <https://southeastasiaglobe.com/cambodias-internet-gateway-leaves-analys....>
- 155Law on Cybercrime, Kingdom of Cambodia, accessed May 31, 2024.
- 156Mech Dara and Hor Kimsay, “Three ministries set up web-monitoring group to look out for ‘fake news,’” Phnom Penh Post, June 7, 2018, <https://www.phnompenhpost.com/national/three-ministries-set-web-monitor....>
- 157“Civil Society Rejects Government Attack on Freedom of Expression,” CCHR, June 2018, https://cchrcambodia.org/index_old.php?title=Civil-Society-Rejects-Gove....
- 158“Status Update: Harassment on Social Media in Cambodia,” Cambodian League for the Promotion and Defense of Human Rights, November 2021, <https://www.licadho-cambodia.org/reports.php?perm=235>.

- 159 Sim Chansamnang, “Report: Legal harassment of Cambodian journalists increasing, Voice of America, April 9, 2024, <https://www.voanews.com/a/report-legal-harassment-of-cambodian-journali...>
- 160 “Cambodia: Dissident, Wife Brutally Assaulted,” Human Rights Watch, September 19, 2023, <https://www.hrw.org/news/2023/09/19/cambodia-dissident-wife-brutally-as...>
- 161 “Soy Sat monks fleeing persecution by authorities,” Radio Free Asia, November 24, 2024, <https://www.rfa.org/khmer/news/human-rights/venerable-soy-sat-is-escapi...>
- 162 “Hun Sen Threatens to Arrest Citizen Who Criticizes Him on Facebook for Complaining with Adhoc Officials,” Radio Free Asia, February 6, 2024, <https://www.rfa.org/khmer/news/politics/hun-sen-threatens-to-arrest-a-p...>
- 163 Colin Meyn, “Meta’s Decision on Hun Sen Skewered as ‘Failure’ to Deter Violence,” Voice of America, September 26, 2023, <https://www.voacambodia.com/a/meta-s-decision-on-hun-sen-skewered-as-fa...>; “Oversight Board announces new case related to Cambodia,” Oversight Board, March 2023, <https://www.oversightboardappeals.com/news/580515594014316-oversight-bo...>
- 164 Liam Scott, “Far-Reaching Threats a Worry for Cambodian-American Journalist,” Voice of America, <https://www.voanews.com/a/far-reaching-threats-a-worry-for-cambodian-am...>; Hel Komsan and Eug Sea, “Licensed Media Publisher Threatens to Kill Cambodia Daily Khmer Journalist on Facebook,” June 26, 2023, <https://cambojanews.com/licensed-media-publisher-threatens-to-kill-camb...>
- 165 “Journalism Situation in Cambodia: Quarterly Monitoring Report, January-March 2023,” CamboJA, May 2023, <https://www.camboja.net/wp-content/uploads/2023/05/Quarterly-Report-Jan...>; “ទៀតហើយ អ្នកសារព័ត៌មាន ត្រូវបានម្ចាស់អាជីវកម្ម ប្លង់ខ្សាច់ ធ្វើសកម្មភាព ឆក់យកកាដាសំគាល់ខ្លួន រហូតឈានទៅដល់ ហិង្សា,” Kang Meas News, January 28, 2023, http://www.kangmeasnews.com/2023/01/kmn_90.html.
- 166 “Cambodian Journalism situation Report 2022: An annual record of reported harassment cases against journalists,” Cambodian Journalists Alliance Association, April 2023, <https://www.camboja.net/wp-content/uploads/2023/04/2022-Cambodian-Journ...>
- 167 Trudy Harris, “Cambodia’s Internet crackdown reaches its activist monks,” Coda Story, March 28, 2019, <https://www.codastory.com/authoritarian-tech/cambodias-internet-crackdo...>; “សមាគម អាដហុក បារម្ភពីគេហទំព័ររបស់ខ្លួនត្រូវបានក្រុមហ៊ុនបច្ចេកវិទ្យាចូលគ្រប់គ្រង [ADHOC Concerned About Its Website Being Taken Over by Hackers],” RFA, July 19, 2018, <https://www.rfa.org/khmer/news/human-rights/Adhoc-website-was-hacked-07...>; Pav Suy, “More Facebook pages hacked,” Khmer Times, February 28, 2018, <https://www.khmertimeskh.com/110854/facebook-pages-hacked/>; Mech Dara, “Fresh News blames hackers for false post on Hun Sen’s death,” Phnom Penh Post, November 28, 2017, <https://www.phnompenhpost.com/national/fresh-news-blames-hackers-false-...>; Hor Kimsay and Daphne Chen, “Hacks a ‘wake up call’ to telecom security weaknesses: gov’t,” Phnom Penh Post, March 14, 2018, <https://www.phnompenhpost.com/national/hacks-wakeup-call-telecom-securi...>
- 168 Torn Vibol, “Info Ministry looking for hackers of state media Facebook pages,” Khmer Times, September 21, 2023, <https://www.khmertimeskh.com/501363893/info-ministry-looking-for-hacker...>
- 169 Jonathan Greig, “Chinese APT groups target dozens of Cambodian government orgs,” The Record, November 9, 2023, <https://therecord.media/chinese-apt-groups-target-cambodian-organizatio...>
- 170 Ellen Nakashima, “Chinese cyberspies have widely penetrated networks of ally Cambodia,” The Washington Post, November 8, 2023, <https://www.washingtonpost.com/politics/2023/11/08/cambodia-has-chinese...>
- 171 Vishwa Pandagle, “Cambodia Angkor Air Cyber Attack: ‘Host Kill Crew Hackers’ Claims Responsibility,” May 10, 2023, <https://thecyberexpress.com/cambodia-angkor-air-cyber-attack-airlines-h...>