

# Cambodia Country Focus Report November 2025



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## A) An Introduction to the Enabling Environment

What we understand by an Enabling Environment is the combination of laws, rules and social attitudes that support and promote the work of civil society. Within such an environment, civil society can engage in political and public life without fear of reprisals, openly express its views, and actively participate in shaping its context. This includes a supportive legal and regulatory framework for civil society, ensuring access to information and resources that are sustainable and flexible to pursue their goals unhindered, in safe physical and digital spaces. In an enabling environment, the state demonstrates openness and responsiveness in governance, promoting transparency, accountability, and inclusive decision-making. Positive values, norms, attitudes, and practices towards civil society from state and non-state actors further underscore the supportive environment.

To capture the state of the Enabling Environment, we use the following six principles:

## **SIX ENABLING PRINCIPLES**

- 1. Respect and Protection of Fundamental Freedoms
- 2. Supportive Legal and Regulatory Framework
- 3. Accessible and Sustainable Resources
- 4. Open and Responsive State
- 5. Supportive Public Culture and Discourses on Civil Society
- 6. Access to a Secure Digital Environment

In this Country Focus Report, each enabling principle is assessed with a quantitative score and complemented by an analysis and recommendations written by our Network Members. Rather

than offering a singular index to rank countries, the report aims to measure the enabling environment for civil society across the six principles, discerning dimensions of strength and those requiring attention.

The findings presented in this report are grounded in the insights and diverse perspectives of civil society actors who came together in a dedicated panel with representatives from civil society to discuss and evaluate the state of the Enabling Environment. Their collective input enriches the report with a grounded, participatory assessment. This primary input is further supported by secondary sources of information, which provide additional context and strengthen the analysis.

## **Brief Overview of the Country Context**

The Cambodian People's Party (CPP) has consecutively won the national election and governed Cambodia for almost four decades, dominating political life, government institutions, and the judiciary, resulting in a highly restricted democratic environment. Even though the constitution declares Cambodia to be a democratic country led and managed by multiple parties, in practice, only one party currently governs the nation.

The transition of prime ministerial power to the former prime minister's son in 2023 has not reversed the trend of authoritarian governance. Elections are tightly controlled, with opposition parties facing legal and administrative barriers, civil society actors targeted, and independent media largely suppressed.

Civil society in Cambodia continues to face a gradually shrinking civic space under the relevant laws covering the operation of NGOs. Freedoms of expression, assembly, and association were further curtailed in 2024, with peaceful public gatherings virtually impossible due to permit requirements and government harassment. Activists, opposition figures, and human rights defenders remain under surveillance, intimidation, and risk of detention, while government narratives portray CSOs as foreign agents threatening national security. This environment has generated widespread fear, prompted self-censorship, and forced civil society activities primarily into private spaces.

Funding challenges have compounded these restrictions. The withdrawal of major donors like USAID and SIDA has significantly reduced resources for human rights and democracy-promoting CSOs. Recently, the United States Department of State announced that its embassies will no longer be permitted to fund initiatives aimed at promoting democracy and human rights. This decision risks silencing the voices of victims, such as communities affected by land grabbing, whose stories are often conveyed through civil society organisations to international actors. including donors, development partners, and foreign governments. When these voices are not heard, injustices are more likely to persist because the lack of visibility reduces accountability and weakens pressure for reform in Cambodian society. Many organisations are scaling back or relying on voluntary efforts while appealing for new funding from other democratic international partners. NGOs focused on non-sensitive development areas such as agriculture, education, and gender continue some operations without government interference. Despite these, civil society remains an important actor in supporting community-level legal aid, human rights awareness, social service delivery, and public dialogue. However, they must steer a complex and repressive political culture that co-opts, controls, and stifles independent voices. The government retains strong regulatory control through laws like the Law on Associations and Non-Governmental

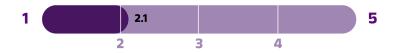
Organisations	(LANGO)	and	surveillance	provisions,	undermining	civil	society's	ability	to
advocate freely	<i>/</i> .								

## B) Assessment of the Enabling Environment

## **PRINCIPLE SCORE**

## 1. Respect and Protection of Fundamental Freedoms

Score: 2.1/5 (Repressed) 1



In Cambodia, fundamental civic freedoms, such as freedom of association, peaceful assembly, and expression, are enshrined in the <u>Constitution</u> and international treaties such as the International Covenant on Civil and Political Rights (<u>ICCPR</u>).

### 1.1 | Freedom of Association

Freedom of association is legally protected under both national and international frameworks. Cambodia's Constitution (Article 42) and its ratification of the ICCPR safeguard this right. In practice, however, challenges persist. Panellists acknowledged that most NGOs and associations are able to register and operate, particularly those working in service delivery or development. Nevertheless, groups engaging in advocacy, especially around human rights, democracy, or natural resources, face scrutiny. Despite the presence of informal youth and community groups operating with minimal interference, CSOs working in sensitive sectors described the operating space as fragile and conditional.

#### 1.2 | Freedom of Peaceful Assembly

<sup>&</sup>lt;sup>1</sup>This is a rebased score derived from the <u>CIVICUS Monitor rating</u> published in December 2024. The country is rated as Repressed in the Monitor, with a score of 27 out of 100, which has been converted to fit our 1–5 scale.

Freedom of peaceful assembly remains constrained. Although Article 41 of the Constitution guarantees this right, and Cambodia is a party to the ICCPR (Article 21), the panellists noted that approvals are often required in advance, particularly from sub-national authorities. In many cases, CSOs must seek permission at district or provincial levels, and even then, events, especially those related to governance, land rights, or labour, are restricted or monitored. Events in public or hotel venues are often reported to authorities, and police are present at some CSO activities. While children and youth have been able to participate in advocacy activities in some sectors (e.g., education), participants noted that government often requests advance review of materials and may discourage the inclusion of politically sensitive themes.

Cambodia's <u>Law on Peaceful Demonstration</u> (2009) requires that organisers notify authorities in advance but does not explicitly require prior permission or registration to hold a peaceful assembly. Despite this, in practice, authorities <u>often impose restrictive</u> prior notification requirements which function as a de facto permission system, and protests by unregistered groups or informal civic initiatives are frequently disrupted or banned by security forces. Notably, in July 2024, <u>10 members of Mother Nature Cambodia were convicted</u> for environmental activism, and later in the year <u>at least 94 individuals were arrested for protesting against a trilateral development plan</u>. These incidents illustrate how restrictions remain context-dependent, selective, and influenced by perceived political alignment.

#### 1.3 | Freedom of Expression

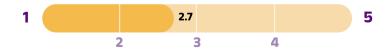
Freedom of expression is similarly limited. While the Constitution and the ICCPR (Article 19) guarantee this right, the legal environment has become increasingly restrictive. Panellists reported widespread self-censorship, particularly among civil society actors working on accountability and human rights issues. Authorities monitor both offline and online expression, and those who publicly criticise government policies, whether through protests, publications, or social media, risk being summoned, threatened, or charged with offences such as incitement or plotting. In mid-2024, at least 94 people were arrested for public criticism of a government plan; 33 of them were charged under incitement laws. Journalists and independent media face harassment and legal threats, with media outlets increasingly pressured to self-censor or risk shutdown. The 2024 convictions of Mother Nature Cambodia members, including youth activist Phuon Keoraksmey, were widely cited as examples of the ongoing crackdown on environmental and civic expression. While formal legal protections exist, panellists agreed that the current enabling environment reflects a selective and politically influenced application of laws, which continues to narrow the space for open expression and dissent.

In summary, the restrictions on freedoms of association, assembly, and expression collectively undermine Cambodia's overall enabling environment for civil society. When CSOs face barriers to registration, peaceful mobilisation, and open communication, their ability to advocate for rights, influence policy, and hold authorities accountable becomes severely constrained. The selective enforcement of laws and surveillance of activists foster a climate of fear and self-censorship, discouraging participation and innovation within civic space. Consequently, collaboration between state and non-state actors weakens, transparency declines, and public trust erodes, limiting the potential for inclusive and rights-based development.

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## 2. Supportive Legal and Regulatory Framework





### 2.1 | Registration

The legal framework in Cambodia requires all associations and non-governmental organisations (NGOs), including social movements and informal civic initiatives, to register before engaging in organised activities. While most are able to register successfully, the process remains moderately burdensome, particularly for local organisations. The 2015 Law on Associations and Non-Governmental Organisations (LANGO) remains the primary legal instrument governing CSO registration, and despite persistent advocacy, no amendments have been adopted. While the registration process is clearly articulated in law, its implementation continues to be bureaucratic and inconsistently applied across different types of organisations and locations.

The Ministry of Interior (MoI) piloted an online registration portal in late 2024, which has moderately improved efficiency for some international NGOs, with processing times of approximately 30 days. However, a few local NGOs, especially grassroots or community-based organisations, report continued delays of three to six months, unclear or excessive documentation requirements, and the resulting need for NGOs to go back and forth to the MoI several times for follow-up.

These administrative inefficiencies create financial and procedural barriers that disable timely and equitable access to registration, especially for organisations with limited capacity. Panellists reported that their NGOs were eventually registered successfully and had received the notification letter from Mol.

Even when registrations are approved, the process to be able to operate legally in practice can be complicated. NGOs that have their office in Phnom Penh but want to implement projects at the provincial or sub-national level first need to seek approval from Mol and particularly from the provincial governor, even though their organisations are already registered with Mol. Furthermore,

while appeal mechanisms formally exist in case such approval is denied, they are rarely pursued or effective due to ambiguous legal standards and the risk of political interference. NGOs were eventually able to open offices at the subnational levels or in provinces, but the process requires long discussions with provincial governors and the Mol.

#### 2.2 | Operational Environment

Regulatory restrictions disproportionately affect organisations working on politically sensitive issues such as land rights, forestry, or indigenous community advocacy. The government often perceives such activities as challenging state authority, exposing corruption, or mobilising communities in ways that could spark social or political contestation. As a result, these organisations face administrative barriers, closer monitoring, or even suspension of activities. According to a panellist, several community-based organisations were officially warned for operating without registration during land rights protests in 2024, highlighting ongoing regulatory pressure on informal civic initiatives. Civic space in the country thus remains <u>"repressed"</u>, with the government routinely using laws such as LANGO to monitor, restrict, and penalise unregistered or outspoken groups.

Generally, the law allows CSOs to set their own objectives and carry out activities. The LANGO formally permits CSOs to register and operate and does not require government approval for most internal governance or mission-setting decisions. In practice, most CSOs are able to conduct dayto-day operations without direct interference. However, the operational environment is constrained by bureaucratic burdens, regulatory ambiguity, and selective enforcement, particularly affecting CSOs working in governance, land rights, human rights, or democracy. The implementation of LANGO continues to create challenges. While domestic CSOs are not required to seek prior approval for each activity, some report being pressured at the subnational level to obtain additional endorsements from local authorities before conducting trainings, workshops, or community outreach. These requirements are not always grounded in law but are applied in practice. A small number of advocacy-oriented organisations also describe being subject to closer monitoring, informal warnings, or administrative delays. Foreign CSOs are generally expected to obtain Memoranda of Understanding (MoUs) from relevant ministries or local authorities, even after completing formal registration. However, this requirement is inconsistently enforced. In practice, many foreign CSOs have been able to implement their activities without disruption, and there have been no reported cases of fines, official warnings, or work delays due to the absence of an MoU. Nonetheless, the lack of clarity around enforcement creates an atmosphere of legal uncertainty, especially for organisations working in sensitive areas such as environmental protection or civic education.

According to field data shared by one of the panellists, a few CSOs report that cooperation with local and national authorities is possible when their activities align with the country priorities. However, those engaging in advocacy or addressing sensitive issues frequently encounter informal barriers, such as delayed approvals or requests for revisions to planned activities. Panellists noted that government-organised NGOs (GONGOs) receive preferential treatment in registration and implementation, highlighting disparities in regulatory enforcement.

Administrative burdens also hinder operational autonomy. <u>Prakas 625</u> (October 2024) from the General Department of Taxation introduced additional financial compliance measures, including

mandatory quarterly VAT reconciliation reports. This has increased administrative costs by an estimated 12% for small and medium-sized CSOs and led many to hire external accountants, straining limited budgets and capacity, especially in rural areas, as reported in one panellist's field note.

#### 2.3 | Protection from Interference

While formal restrictions on programmatic activity are limited, state surveillance and monitoring are a concern for a few CSOs working in human rights and democracy. <u>CIVICUS</u> has documented cases of intimidation or monitoring of CSOs, particularly those involved in rights-based advocacy. For example, the labour rights organisation <u>CENTRAL</u> was subjected to investigation by the Ministry of Interior after publishing a report on freedom of association. Such scrutiny contributes to a chilling effect, leading some organisations to self-censor or avoid public-facing engagement.

Despite these constraints, the majority of CSOs in Cambodia continue to operate and implement programmes across various sectors without significant interference. Most activities proceed without obstruction, and routine operations are generally permitted. However, a small number of CSOs, particularly those working on human rights, land issues, or democratic governance, face occasional procedural delays or differential treatment. While these challenges do not constitute outright restrictions, they limit the ability of these specific organisations to operate with full autonomy and may lead to cautious self-regulation in their work.

The legal framework provides minimal and uneven protection for CSOs against interference, with disparities in how different types of organisations are treated. Government-affiliated CSOs and those aligned with state interests (such as the Civil Society Alliance Forum (CSAF) or GONGOs) enjoy greater operational freedom and implicit protection. The CSAF's October 2024 statement of support for the Ministry of Land Management's policies, such as land registration, improved public services, and a dispute-free environment, highlights a recurring pattern in Cambodia's governance ecosystem: Platforms such as the CSAF frequently issue public endorsements of state-led initiatives. These declarations serve a dual purpose: they amplify the government's narrative of inclusive reform while simultaneously securing operational advantages for the endorsing organisations. This raises critical questions about the authenticity of civil society engagement. Such statements are less about genuine advocacy and more about reinforcing a controlled civic space where support is rewarded and dissent marginalised. This transactional relationship blurs the line between civil society autonomy and state influence, challenging the credibility of participatory governance in Cambodia. In contrast, independent, rights-based NGOs, particularly those working on sensitive issues like land rights, governance, or human rights, face a higher risk of surveillance, arbitrary administrative burdens, and targeted restrictions.

LANGO continues to authorise broad grounds for the suspension or dissolution of CSOs, including vaguely defined threats of "endangering national security." This lack of specificity leaves space for politically motivated decisions that threaten independent voices and creates an atmosphere of legal uncertainty. Legal mechanisms for appeal are rarely effective or accessible, particularly for marginalised groups and politically sensitive organisations. Routine inspections and burdensome reporting requirements are also frequently used as <u>instruments of pressure</u>. For example, one human rights CSO was required to submit monthly financial reports and faced the

risk of suspension for minor discrepancies, regardless of intent. These practices contribute to a climate of intimidation and administrative control rather than transparent oversight.

Access and cooperation with authorities at the sub-national level can sometimes be achieved when relationships are strong and issues are not deemed politically sensitive. However, this engagement depends heavily on individual discretion, as many local officials lack awareness of CSO-related policies or apply them inconsistently. One provincial network member noted that while it is possible to work with government officials, "there is no room to talk" when activities are linked to opposition-aligned topics. Third-party harassment also remains a concern. Independent CSOs, especially those involved in advocacy, report being discredited or publicly monitored by government-aligned or so-called "yellow" organisations. There are no legal safeguards in place to prevent or redress this kind of interference, leaving affected CSOs vulnerable and isolated.

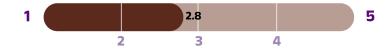
Finally, the 2024 Universal Periodic Review (UPR-45) highlighted these concerns, with 27 recommendations issued to the Cambodian government urging it to protect civic space and end harassment of human rights defenders, including by simplifying registration processes, ensuring fair and consistent application of LANGO, and removing administrative and bureaucratic barriers that restrict the operations of independent CSOs. However, 18 of these recommendations were not accepted, underscoring the government's overall limited commitment to structural reforms.

In summary, although Cambodia's legal framework formally allows CSOs to register and operate, selective enforcement and administrative burdens limit the enabling environment in practice. Independent organisations, particularly those working on human rights, land rights, or democratic governance, face delays, informal pressures, and heightened scrutiny, while government aligned CSOs and GONGOs enjoy preferential treatment. As a result, the enabling environment remains fragile and conditional, and freedom of association is only partially realised.

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## 3. Accessible and Sustainable Resources





#### 3.1 | Accessibility

CSOs in Cambodia are generally able to search and apply for funding opportunities, particularly from international sources. However, actual accessibility is uneven and largely determined by a CSO's internal capacity, especially in areas such as proposal writing, project design, and financial reporting. Local and smaller organisations, in particular, struggle to meet increasingly complex donor requirements, leaving many underfunded or entirely excluded from competitive funding channels.

#### 3.2 | Effectiveness

While international donors provide important financial resources to Cambodian CSOs, the effectiveness of these resources is often constrained by the conditions attached. Many funding arrangements exclude essential operational costs such as staff salaries, administration, and infrastructure, leaving organisations under-resourced to sustain their work. At the same time, some donors impose strict compliance requirements, such as DFAT's Modern Slavery Act provisions on fair wages, workplace safety, and ethical practices, alongside obligations for audits, detailed progress reports, and policy adherence. These conditions, while intended to strengthen accountability, can limit how freely CSOs use the resources to design and implement effective programmes. Accessing and managing such funds therefore requires a high level of organisational capacity in areas like proposal development, technical reporting, and financial management. Smaller or grassroots CSOs, particularly those led by women, youth, or marginalised groups, often lack these capacities and are effectively excluded from funding opportunities, reducing the inclusiveness and diversity of civil society initiatives.

Nevertheless, some positive shifts have occurred. Since 2021, several donors have adopted localised funding approaches that prioritise direct engagement with local NGOs, according to the panellists. These models have helped reduce compliance burdens, improved communication, and increased donor responsiveness. Panellists noted that such localised approaches have strengthened mutual accountability and reduced perceptions of favouritism or donor dominance. Despite these gains, rigid and time-consuming reporting requirements remain a burden, often drawing resources away from implementation. The lack of feedback on unsuccessful proposals continues to be a missed opportunity for capacity building and improved grant competitiveness among local CSOs. However, the donors who shifted to local-led approaches still work with local NGOs that have higher levels of capacity, rather than Community Based Organisations (CBOs).

This challenge has been exacerbated by a significant decline in international donor funding. Between <u>January 2020 and January 2025</u>, <u>USAID alone cut over \$371 million</u> in support, impacting at least 185 CSO-led projects. EU development aid has also declined with the EU's <u>Multi-Annual Indicative Program</u> outlining a gradual phase-out of direct CSO support by 2027, further straining the sector. According to <u>CCC's 2024 survey of 103 CSOs</u>, 70% (72 CSOs) secured new grants in 2024, and 17% secured the fundings for five years, yet only 10% secured new grants for 2025. However, 32% of organisations continue to operate on less than USD 100,000 per year, and just 4% of total CSO revenue came from local philanthropy, highlighting a deep dependence on external funding.

Administrative and regulatory burdens also hinder access. This year, 2025, CSOs are required to submit verified bank account documentation and financial records to the Ministry of Interior in addition to the normal annual report they used to submit to the Mol, and notification of this new requirement was not provided to CSOs early. Some banks charge additional service fees for this verification, creating a financial barrier for low-resource organisations. In some cases, CSO staff have had to use personal funds to cover compliance-related costs. Moreover, the slow and partial implementation of the Access to Information (A2I) law limits CSOs' ability to obtain public data necessary for evidence-based programming.

Donor application procedures remain technical and demanding. Proposals typically require extensive financial records and detailed project design documents, which smaller CSOs often cannot prepare without additional capacity-building support. Feedback on unsuccessful proposals is rarely provided, undermining the ability of local actors to improve future submissions.

#### 3.3 | Sustainability

Sustainability remains a significant challenge for Cambodian CSOs, many of which are heavily dependent on short-term, project-based funding from external donors. Unlike member-based unions, most CSOs in Cambodia lack mechanisms to mobilise internal resources through member contributions or other sustainable revenue streams. As a result, when donor funding ends, organisations often struggle to maintain operations, leading to staff reductions, project discontinuity, and even organisational closure.

A major barrier to sustainability is the limited coverage of operational costs and staff salaries in most donor grants. Despite increasing compliance demands, such as audits, reporting, and observance of laws and policies, core funding is often excluded, leaving CSOs under-resourced.

This creates a situation in which organisations are simultaneously expected to perform more while receiving less institutional support.

Government regulations and informal practices further hinder efforts to diversify funding. Some CSOs face significant challenges in securing a Memorandum of Understanding (MoU) and/or engaging with ministries unless they provide Direct Support Allowances (DSAs) or other financial incentives to officials. As many international donors and development partners require government endorsement as a condition for grant eligibility, this hindrance in collaboration with the government also negatively affects CSOs' ability to diversify funding partners.

Local fundraising is underdeveloped, in part due to the absence of legal, fiscal, or social incentives. While, according to the panellist, NGOF successfully mobilised \$80,000 from five Cambodian agribusinesses in 2024, such cases of successful local fundraising remain the exception. Tax incentives for donors and CSO operations exist in policy but are limited in scope and inconsistently applied. The complexity of accessing exemptions discourages widespread benefit.

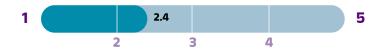
While a few organisations have initiated income-generating activities, such as training services or product sales, these contribute only marginally to their budgets. For example, NGO Forum's earned income accounts for less than 5% of its annual revenue. Compounding this issue is the broader trend of shrinking international support creating funding gaps that few local organisations are equipped to fill, given the lack of financial reserves and income alternatives. Only 11% of CSOs surveyed by CCC in 2024 reported having more than six months of unrestricted reserves, showing the sector's widespread financial vulnerability. Moreover, due to limited core funding and heavy workloads, many CSOs lack the time, tools, and knowledge needed to explore innovative sustainability models or build their internal fundraising capacities.

Overall, while resources are technically available, their accessibility and sustainability are highly uneven, creating structural disadvantages for smaller and grassroots CSOs. The combination of donor-driven compliance burdens, limited coverage of operational costs, declining international aid, weak local fundraising frameworks, and restrictive government requirements undermines the financial resilience of civil society. These constraints not only limit organisational diversity and inclusiveness but could also weaken CSOs' ability to engage meaningfully in governance, advocacy, and service delivery. As a result, only a subset of well-resourced organizations are able to thrive, while many others operate at the margins with uncertain futures.

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## 4. Open and Responsive State





### 4.1 | Transparency

Transparency in Cambodia remains limited and inconsistent, with restricted access to essential public information. While legal frameworks exist to promote information sharing, they are weak, selectively enforced, and often undermined by broad exemptions and administration. In practice, government agencies disclose only the information they choose to release, frequently omitting key documents, especially on sensitive issues such as the Cambodia-Laos-Vietnam (CLV) agreement and other strategic or politically sensitive matters.

The Access to Information (A2I) Law, which was tabled in June 2024, has yet to be adopted. Even in draft form, the law includes vaguely defined exemptions, particularly concerning "national security", which provide the government with wide discretion to reject information requests. This ambiguity <u>undermines the law's potential</u> to guarantee transparency. In theory, public institutions are required to disclose information. However, many government websites are outdated, and relevant documents are not routinely uploaded or made available in accessible formats or local languages. This digital gap particularly affects rural CSOs and community-based organisations that rely on online access to obtain critical public data.

Freedom of Information (FOI) mechanisms, where they exist, are slow, complicated, and often unreliable. For example, one local NGO that submitted a formal request for data on land concessions had to wait several months and ultimately received only an incomplete and outdated dataset. Rejections are frequently justified using vague terminology such as "threats to national security" without specific explanations or guidance on how to appeal such decisions. Another example was the <a href="2024 NGO census">2024 NGO census</a>, the process for which was led and managed by the MoI. However, until now the information or list of total NGOs still cannot be accessed by NGOs.

International assessments confirm this downward trend in transparency. According to the <u>2024</u> <u>Open Budget Survey</u> by the International Budget Partnership, Cambodia's transparency scored 43 out of 100, citing poor public access to key budget documents and minimal opportunities for public participation (score 2 out of 100) in the budget process. These patterns indicate that while

frameworks for transparency may exist on paper, their implementation remains weak and selective, limiting civic participation, public accountability, and trust in state institutions.

#### 4.2 | Participation

Opportunities for civil society participation in government decision-making exist in Cambodia, but they are irregular and selective. Although draft laws are occasionally made available, consultation processes are narrow and lack inclusivity. While some CSOs are invited to consultations, these opportunities are typically extended to a limited number of organisations, often those perceived as non-critical or aligned with government priorities, such as service delivery CSOs. CSOs working on sensitive or controversial topics, such as human rights, environmental justice, or land governance, are less likely to be included in formal consultation processes. According to a <a href="2024">2024</a> study from Lund University, this selective participation is driven by issue-based discrimination and perceived political alignment, leading to tokenistic engagement and restricted influence.

When government allows CSOs to attend public debates, their opinions are not requested or valued. This reflects an environment in which CSOs are present but often unheard. Consultations are often announced at short notice, sometimes just a few days in advance, leaving little time for CSOs to prepare evidence-based input or conduct community consultations. As a result, their contributions are often general, and the ability to influence policy is constrained. In many government-led events, CSOs are discouraged from raising critical or politically sensitive topics. Agendas are often predetermined, and CSOs are left with little space to engage meaningfully beyond symbolic participation. The participation process tends to be one-directional. While the government may acknowledge CSO feedback, deeper engagement, particularly when input conflicts with official positions, is often resisted. Time constraints, lack of clarity about consultation objectives, and the absence of structured feedback mechanisms limit genuine dialogue and shared decision-making as well as civil society's ability to contribute to policy formulation and hold government accountable. Their participation in public debates and dialogues is often symbolic, largely dependent on their financial resources or connections with government actors. CSOs without external funding or strong networks are frequently excluded from consultations and public platforms.

Despite these challenges, there are a few encouraging examples of more structured collaboration. In the education sector, CSOs participated in the Joint Technical Working Group under the Ministry of Education, Youth and Sport (MoEYS), as noted in <a href="the 2024 SDG-4">the 2024 SDG-4</a> Spotlight Report. Additionally, following sustained advocacy, NGO Forum was invited to co-chair the National Social Protection Council consultation in January 2025, demonstrating that constructive engagement is possible when trust and long-term relationships are established. However, such examples remain exceptions rather than the rule.

Additionally, sub-national platforms offer a more promising environment. In provinces such as Ratanakiri and Siem Reap, dialogue forums allow CSOs to raise local concerns and occasionally influence decisions. These interactions are characterised by a degree of mutual respect, with local officials recognising CSOs' contributions. However, the impact of such dialogue rarely extends to the national level, and there is minimal integration of sub-national feedback into policy processes.

## 4.3 | Accountability

Accountability mechanisms between the government and civil society in Cambodia remain weak and inconsistent. While channels for civil society input do exist, there is a widespread absence of structured follow-up, feedback, or institutional responsiveness, especially at the national level. Many CSOs report that after participating in consultations or submitting advocacy inputs, they receive no formal feedback or updates. Moreover, inputs provided by CSOs are rarely reflected in the final draft and the approved laws or policy documents. For example, while civil society was involved in education policy consultations, there remains limited clarity on how much of their input was incorporated. Similarly, during the drafting of the National Action Plan on Violence Against Children (2025-2030), CSO contributions were only partially accepted, and no explanation was given regarding the exclusion of other recommendations. The Ministry of Information has been repeatedly cited as unresponsive to CSOs' engagement requests. Even when feedback is promised, it is rarely delivered unless CSOs proactively follow up. In some cases, government officials have cited language barriers (e.g., lack of Khmer translation, key terms) as a reason for excluding CSO input.

At the sub-national level, however, there are a few examples of more responsive practices, as shared by the panellists. During the <u>Provincial Partnership Dialogue (PPD)</u> from 2024 to 2025, <u>local authorities in some provinces have acted on community concerns raised</u> by CSOs. In some cases, deputy governors have instructed district or commune officials to follow up on specific issues. Yet, these positive responses are dependent on local leadership and are not standardised across provinces. There is no national framework guiding how authorities should act on CSO input, resulting in uneven accountability practices. Some ministries, such as the Ministry of Economy and Finance (MoEF), have shown partial responsiveness. For example, CSO recommendations to increase commune budgets were acknowledged through formal letters, but actual budgetary changes were minimal.

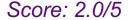
In most cases, CSOs must initiate follow-ups to get any clarity or outcome from prior engagements. Government agencies rarely provide proactive updates on how CSO input has been used or what actions have been taken. There is also no formal mechanism for civil society to appeal decisions, question exclusions, or challenge the misuse of their contributions, for example through selective uptake of CSO input to legitimise predetermined government decision. This lack of structure undermines trust and effective engagement processes, with many CSOs describing participation as a check-box exercise rather than genuine collaboration.

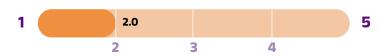
The <u>2024 Corruption Perceptions Index</u> gave Cambodia a score of just 21 out of 100, highlighting persistent corruption concerns. These systemic weaknesses undermine accountability mechanisms that would otherwise allow government institutions to respond meaningfully to CSO recommendations or citizen feedback. A 2025 community scorecard pilot in Kampong Thom conducted by NGOF found that 54% of community grievances remained unresolved after six months, demonstrating the poor institutional follow-through even at the local level.

In conclusion, the limited transparency, selective participation, weak accountability mechanisms, and inconsistent responsiveness constrain the enabling environment for civil society in Cambodia. While some positive examples of collaboration exist at the sub-national level, the prevailing practices of tokenistic consultation, lack of feedback, and discretionary information sharing undermine trust, reduce the quality of civic engagement, and restrict CSOs' ability to contribute meaningfully to governance and policy processes.

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## 5. Supportive Public Culture and Discourses on Civil Society





## 5.1 | Public Discourse and Constructive Dialogue on Civil Society

Public discourse around civil society in Cambodia remains constrained by political rhetoric, limited media freedom, and unequal engagement opportunities. At the national level, public discourse is shaped by government narratives. Officials tend to prioritise showcasing achievements over engaging in open or critical dialogue with civil society. Many government-CSO interactions in public appear performative, with CSO presence acknowledged but their input sidelined. Media plays a critical role in shaping public perceptions, but independent coverage of civil society is increasingly limited. Media outlets often repeat state messaging while avoiding or censoring sensitive issues. As a result, CSOs, especially those focused on democracy, accountability, or human rights, are either ignored or portrayed in a negative light. For example, Prime Minister Hun Sen <u>publicly accused</u> 40 CSOs, who released a joint statement in defence of a female Voice of Democracy (VOD) reporter targeted by online harassment, of being established solely to oppose the government, rather than to protect women's rights.

The rhetoric from political figures further undermines public trust in civil society. CSOs are at times classified as foreign agents or threats to national stability, particularly those engaged in rights-based advocacy. Before the 2018 elections, a government-issued White Book explicitly associated over 300 civil society groups with orchestrating a "colour revolution." Interior Minister Sar Kheng later dismissed these as comments from individual officials. Although government agencies often rely on CSOs for technical assistance or financial cooperation, the broader political narrative remains wary and, at times, openly critical of civil society actors. This environment has fostered widespread self-censorship among CSOs and individuals. Many civil society representatives report avoiding controversial statements in public forums or on social media, fearing backlash or legal consequences.

While there are occasional moments of constructive dialogue, particularly at the local level, public discourse around CSOs remains largely constrained by suspicion, limited media visibility, and restrictive political conditions.

### 5.2 | Perception of Civil Society and Civic Engagement

Among the broader public, CSOs in Cambodia continue to maintain a relatively positive perception, especially at the local level. In provinces such as Ratanakiri, where approximately 40 NGOs are active, CSOs play a visible role in community outreach, civic education, election monitoring, and advocacy on social justice issues. They are often seen as trusted intermediaries between communities and the government. Campaigns like NGO Forum's 2024 tax fairness initiative, which gathered 19,000 online pledges, also reflect latent civic energy and public support for civil society-led initiatives.

However, this positive perception of CSOs does not translate into a culture of active civic engagement. The ability of ordinary citizens to influence government decisions remains limited. While CSOs provide channels for civic participation, citizens often feel powerless to shape political decisions or contribute meaningfully to policymaking. Panellists observed that civic actors struggle to influence government policy and that many Cambodians lack confidence in their ability to make a difference, largely due to limited political will, weak accountability mechanisms, and a top-down governance culture. Moreover, voting in national elections, though widely practised, is often influenced more by pressure or political obligation than by civic motivation or empowerment.

#### 5.3 | Civic Equality and Inclusion

Civic education is minimal, both in schools and in community settings. While some CSOs attempt to fill this gap through outreach and public education campaigns, these efforts are limited in reach and depth. As a result, most Cambodians remain unaware of their rights and the available mechanisms for participation. For example, while basic civic topics may be introduced in school curricula, there is little emphasis on equipping citizens, especially youth, with the skills or knowledge needed to understand and exercise those rights. This weak foundation hinders meaningful civic engagement beyond symbolic acts such as voting.

Independent media plays a critical role in civic education, yet journalists and outlets face ongoing threats of legal action and intimidation. This restricts the ability of the media to create an informed and engaged public, especially on sensitive topics such as corruption, human rights, and government accountability. Although peaceful demonstrations and activism occur, they are often subject to surveillance or suppression, which discourages open civic expression and fosters fear among citizens. Despite the presence of national policies promoting inclusion, civic equality in Cambodia remains limited in practice, particularly for vulnerable and marginalised communities. Ethnic minorities, the urban poor, persons with disabilities, and LGBTQ+ individuals continue to face systemic exclusion from civic life and public services.

Structural inequalities hinder the ability of marginalised groups, such as indigenous peoples, urban poor communities, and persons with disabilities, to participate meaningfully in decision-making and civic engagement spaces. For indigenous families, land concessions and infrastructure projects have resulted in displacement, often violating legal protections meant to secure their land rights. This not only removes them physically from their ancestral territories but

also undermines their ability to advocate for their interests. <u>LICADHO</u> reported at least nine arrests of indigenous land activists in Koh Kong province, illustrating the ongoing risks faced by those defending community rights.

Urban poor populations face systemic barriers to accessing essential state benefits, such as the IDPoor card, which is frequently denied to families not officially recognised as residents. This bureaucratic exclusion is compounded when individuals try to register in their place of origin, only to be told that support is unavailable, highlighting both territorial discrimination and gaps in the social protection system. Corruption and discrimination in social protection programmes systematically exclude marginalised groups, particularly persons with disabilities, from the services and support they are entitled to. When access to benefits is undermined by political connections or manipulation of eligibility criteria, those most in need face deeper social exclusion. This not only weakens their economic security but also limits their ability to participate in civic life and collective action, reinforcing structural barriers to meaningful engagement in civil society.

Although legal reforms have made some progress, such as the labour law amendment mandating a 2% employment quota for persons with disabilities in public sectors, enforcement remains inconsistent. Without meaningful access to education, vocational training, and employment, people with disabilities or those from minority backgrounds face structural barriers that constrain their economic independence, social networks, and civic engagement. Schools in underserved areas often lack trained teachers, inclusive curricula, or accessible materials, preventing children with disabilities from developing the skills and confidence needed to engage in community activities, advocacy, or local governance. These barriers reduce representation and voice, leaving marginalised populations underrepresented in broader civic life.

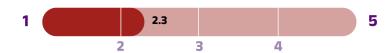
Representation of marginalised groups in policymaking similarly remains limited and often symbolic. While indigenous and minority communities may hold seats in certain consultative bodies, their contributions are frequently sidelined or ignored. This tokenism restricts their influence and perpetuates exclusion from meaningful decision-making processes. Social biases and prejudice also undermine civic inclusion. Public attitudes toward groups such as the LGBTQ+ community and women's rights advocates remain shaped by stigma and misinformation. Although there are positive signs, such as Cambodia's first <a href="Pride Parade in Phnom Penh in June 2024">Pride Parade in Phnom Penh in June 2024</a>, which drew over 3,000 participants peacefully and with municipal authorisation, these moments of visibility are rare and do not yet reflect societal acceptance.

In summary, the public culture and discourse in Cambodia continue to constrain the enabling environment for civil society. Political rhetoric, limited media independence, and selective engagement foster mistrust and self-censorship. Inequalities and corruption systematically exclude marginalised groups from meaningful participation. Although CSOs enjoy some local visibility and public support, weak civic education, tokenistic representation, and persistent social biases limit citizens' confidence and ability to engage in civic life. These conditions reduce the influence of civil society in policymaking, restrict channels for collective action, and weaken the overall culture of civic participation and accountability.

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## 6. Access to a Secure Digital Environment





### 6.1 | Digital Rights and Freedoms

While Cambodia's digital infrastructure has rapidly expanded, the digital rights environment remains restrictive and increasingly surveilled. Government control over online expression has intensified through formal regulations and informal practices, creating a disabling environment for digital freedom and civic engagement online.

Independent and opposition media platforms continue to be blocked, as documented by the Open Observatory of Network Interference, particularly during politically sensitive periods such as the 2023 general election. Authorities also shut down access to independent news websites such as Radio Free Asia (RFA) and Voice of Democracy (VOD) and threatened broader restrictions on social media usage. Freedom of expression online is systematically curtailed. Content critical of the government is selectively censored, while users, both local and abroad, who raise critical views on social issues, including electricity services or public safety, face surveillance, intimidation, and coercion. One example is the administrator of the Facebook page Bun Park, who was forced to issue public corrections for commenting on rising crime rates, and Nuon Toeun, who was arrested in Malaysia for incitement to disturb social security after posting content critical of the Cambodian government. CSOs also face disruptions to their online events and digital campaigns, especially when engaging on sensitive topics. For instance, in 2024, provincial authorities cancelled a meeting of one panellist's extractive-industry coalition, citing security concerns.

Government surveillance is growing. Government monitoring teams track online behaviour, and dissenting content is often removed or hidden, with little transparency from social media platforms. Laws such as the <u>Law on Telecommunications</u> and <u>Sub-decree 23 on the National Internet</u>

<u>Gateway (NIG)</u> grant broad and vague powers to authorities to monitor, control, and block online content deemed a threat to "social order" or "culture." The NIG is a government-mandated mechanism requiring all internet traffic in Cambodia to pass through a single state-controlled gateway. While the official rationale is to "strengthen national security, protect social order, and preserve culture", <u>digital rights experts</u> have warned that the NIG could "severely shrink civic space."

Additionally, a leaked draft of the Cyber-Crime Law (November 2024) criminalises online "insults" to public figures, imposing penalties of up to three years in prison These measures reflect a legal environment that restricts digital freedom rather than protecting it.

## 6.2 | Digital Security and Privacy

Cambodia's digital environment also poses increasing risks to security and privacy. Online scams and fraud, including gambling ads, fake job offers, and loan schemes, are rising, yet there is no strong legal framework to ensure cybersecurity or protect user rights. While the government has introduced initiatives to combat fake news and enhance online safety, these often blur with censorship and control. The <a href="Freedom House Internet Freedom Index">Freedom Index</a> (2025) ranked Cambodia as "Partly Free" (43/100), reflecting shrinking space for online civic expression. Panellists further highlighted that weak safeguards, inconsistent enforcement, and limited digital literacy leave vulnerable groups, particularly youth and the elderly, exposed to phishing, hacking, and disinformation, with CSOs and activists facing heightened risks of surveillance and harassment.

Although laws exist on paper, such as <u>Sub-Decree No. 252</u> on personal data protection and new digital identity regulations, implementation is minimal. Panellists noted that laws are rarely enforced effectively and are often used to punish dissenting voices rather than to safeguard users. This erodes trust in the digital legal framework and discourages open civic use of online platforms. CSOs and activists expressed deep fear of online surveillance and harassment. Many avoid posting sensitive content due to fears of retaliation or monitoring. Some described being targeted by pro-government "cyber armies" or bot networks that conduct coordinated harassment campaigns, often including hate speech, threats, and reputational attacks. One panellist noted that harassment often intensifies when CSOs address politically sensitive issues like land rights or governance.

Findings from <u>digital safety research</u> in Cambodia reveal that over 60% of respondents, many of whom are journalists, activists, or CSO members, reported low confidence in defending against digital threats, such as phishing, account takeover, or surveillance. In parallel, a <u>2021 LICADHO study</u> found that 38% of participants experienced online harassment, highlighting a persistent and widespread exposure to digital risks, including among those working in civil society.

### 6.3 | Digital Accessibility

Cambodia has made significant <u>progress in digital infrastructure</u>, particularly in expanding internet and mobile connectivity. As of early 2025, internet penetration stands at 60.7%, with 4G coverage reaching 93.2% of the population and 82% of the land area. Smartphone usage is high, with 25.3 million mobile connections, exceeding the population, and 12.9 million active social media users, covering 72.4% of the population. These figures reflect an increasingly connected society and a growing opportunity for CSOs to reach communities via digital channels.

Despite these advancements, meaningful digital accessibility remains limited, especially for marginalised and rural populations. For instance, rural communities in Mondulkiri experience internet speeds as low as 9 Mbps, compared to 36 Mbps in Phnom Penh, limiting the ability of CSOs in those areas, such as community forestry groups, to rely on digital tools for engagement or reporting.

Multiple panellists emphasised that access does not equal effective use. While many citizens can access the internet, they lack knowledge of privacy, data protection, and safe online practices. Digital literacy across the population continues to be low with only 32% of Cambodians possessing basic digital skills. Panellists highlighted that digital literacy is especially weak among vulnerable groups such as indigenous communities, women, the elderly, and those living in rural areas. This lack of knowledge leaves people more vulnerable to scams, misinformation, and identity theft, creating mistrust and privacy risks.

Moreover, CSOs and human rights defenders reported being reluctant to engage online due to fears of surveillance, monitoring, and data commercialisation, which create chilling effects on civic expression. These concerns are compounded by the absence of formal digital literacy programs, especially at the grassroots level and disproportionately affects CSOs working with high-risk populations, including LGBTQ+ activists, environmental defenders, and indigenous leaders.

Although there is a growing pool of ICT-skilled labour in urban areas, disparities in access, skill levels, and usage quality between urban and rural populations remain obvious. For example, while CSOs in Phnom Penh can effectively run online campaigns or training, organisations in provinces like Ratanakiri or Preah Vihear often depend on offline or hybrid methods due to connectivity and skill limitations.

In summary, Cambodia's digital environment shapes the enabling environment for civil society. While infrastructure and connectivity have expanded, the restrictive laws, surveillance, censorship, and weak privacy protections limit safe and meaningful online engagement. CSOs, activists, and vulnerable populations face risks of harassment, data misuse, and exclusion, which discourages participation and advocacy. Low digital literacy and uneven access further increase these barriers, particularly for rural and marginalised groups.

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## C) Recommendations

Based on the gaps identified in the report, the following recommendations are proposed:

#### **Government of Cambodia**

- Revise the Law on Associations and Non-Governmental Organisations (LANGO) and other related legislation to safeguard, rather than restrict, freedoms of association, assembly, and expression. Remove arbitrary registration and reporting requirements that stifle CSO operations.
- Ensure fair and transparent legal procedures for civil society actors, journalists, and opposition members, including due process guarantees (such as access to legal counsel and fair trial standards), independent judicial review of politically motivated arrests and detentions, protection from arbitrary or prolonged detention, and consistent, nondiscriminatory application of laws.
- Institutionalise regular forums where CSOs can safely engage ministries (e.g., Ministry of Interior, Ministry of Women's Affairs, Ministry of Social Affairs) on policy development, human rights, and public service delivery.
- Integrate civic education and critical thinking skills to cultivate new generations of informed, engaged citizens.

#### **Donors and International Community**

- Prioritize multi-year, flexible funding for both human rights advocacy and grassroots development CSOs, recognising the importance of core support amid donor withdrawals.
- Develop rapid response funds and emergency relocation programmes for at-risk activists and organisations. Support digital and physical security training for CSOs working under surveillance and pressure.
- Fund independent news outlets and citizen journalism initiatives that provide platforms for civil discourse and government accountability.

• Use diplomatic channels, including the UN, ASEAN, and bilateral relationships, to advocate collectively for civic space, political pluralism, and rule of law. Tie development aid and trade preferences to tangible human rights benchmarks.

#### **Civil Society Organisations**

- Increase collaboration across sectors (e.g., human rights, gender, youth, environmental NGOs) for shared advocacy, resource pooling, and resilience against targeted crackdowns.
- Maintain high standards of governance and transparency in operations and reporting to enhance legitimacy, trust, and resilience to government accusations.
- Expand use of secure digital platforms for public education, documentation, and collaboration, mitigating risks from surveillance and restricted physical assembly.\
- Establish regular monitoring and public reporting on the status of the enabling environment in Cambodia and support local CSOs in accessing international human rights mechanisms.
- Provide technical assistance for CSOs engaging in evidence-based advocacy, legal reform, and constructive government engagement.

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## D) Research Process

Each principle encompasses various dimensions which are assessed and aggregated to provide quantitative scores per principle. These scores reflect the degree to which the environment within the country enables or disables the work of civil society. Scores are on a five-category scale defined as: fully disabling (1), disabling (2), partially enabling (3), enabling (4), and fully enabling (5). To complement the scores, this report provides a narrative analysis of the enabling or disabling environment for civil society, identifying strengths and weaknesses as well as offering recommendations. The process of drafting the analysis is led by Network Members; the consortium provides quality control and editorial oversight before publication.

For Principle 1 - which evaluates respect for and protection of freedom of association and peaceful assembly - the score integrates data from the CIVICUS Monitor. However, for Principles 2-6, the availability of yearly updated external quantitative indicators for the 86 countries part of the EUSEE programme are either limited or non-existent. To address this, Network Members convene a panel of representatives of civil society and experts once a year. This panel uses a set of guiding questions to assess the status of each principle and its dimensions within the country. The discussions are supported by secondary sources, such as V-Dem, the Bertelsmann Stiftung Governance Index, the RTI Rating from the Centre for Law and Democracy, and other trusted resources. These sources provide benchmarks for measuring similar dimensions and are complemented by primary data collection and other secondary sources of information available for the country. Guided by these deliberations, the panel assigns scores for each dimension, which the Network Members submit to the Consortium, accompanied by detailed justifications that reflect the country's specific context. To determine a single score per principle, the scores assigned to each dimension are aggregated using a weighted average, reflecting the relative importance of each dimension within the principle. This approach balances diverse perspectives while maintaining a structured and objective evaluation framework.

The CFR was developed through a robust research cycle, combining quantitative and qualitative methods. A panel of 14 experts convened on 8 August 2025, including CSO representatives, academics, government officials, and donor partners. The panel assessed the six principles using a scoring framework, supplemented by EWM data collected throughout 2024/25, external sources (e.g., media reports, legal documents). Discussions provided nuanced insights into enabling and disabling factors, with case studies illustrating key challenges. The draft was reviewed by the main researcher to ensure accuracy, following which, supporting documents were sourced and hyperlinked. Referenced statutes and regulations were also reviewed to ensure accuracy of information.

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