



CCHR Briefing Note – April 2014

Cambodia: Freedom of Assembly “on hold”

Executive Summary

This Briefing Note focuses on freedom of assembly in the Kingdom of Cambodia (“Cambodia”), and the current unlawful ban on all assemblies, announced by the Ministry of Interior of the Royal Government of Cambodia (the “RGC”) on 4 January 2014. Despite recent suggestions that the RGC may be lifting the ban reported in the media, the ban remains firmly in place. The Cambodian Center for Human Rights (“CCHR”) has documented numerous cases¹ whereby the right to freedom of assembly has been restricted by the RGC since the ban was initially announced. In light of these developments, this Briefing Note provides an overview and analysis of the current situation of freedom of assembly in Cambodia.

This ban on assemblies is being implemented in the context of an ongoing political deadlock: since the July 2013 National Assembly elections, the Cambodian National Rescue Party (“CNRP”) has boycotted the National Assembly, citing election irregularities and holding regular mass demonstrations. In early January 2014, Cambodia bore witness to a violent crackdown by security forces on protests by the CNRP and by garment workers, the latter of whom are demanding higher minimum wages. The crackdowns resulted in the death of at least four individuals, dozens of injuries and the arrest of 23 people, 21 of whom are still being detained.

The first section of this Briefing Note demonstrates that the current ban on assemblies is unlawful under Cambodian law. The second section examines the implementation of the ban; the use of untrained private security forces; the forbidding of protests; the use of intimidation and violence; and the temporary detention of human rights defenders and protesters. Finally, the third section concludes with a series of recommendations, among which are the following key suggestions to the RGC:

- Immediately and formally repeal the current ban of all assemblies, marches and demonstrations in Cambodia;
- Halt the unlawful temporary detention of peaceful protesters and immediately release those that remain in detention for participating in peaceful protests;
- Put an end to the practice of forcing human rights defenders and citizens exercising their fundamental rights to freedom of expression and assembly from signing statements that restrict their rights in order to be released or avoid charges;
- Ensure security personnel have received appropriate training and put an end to the hiring of private security forces; and

¹ Information was collected through victims interviews and through the monitoring of international and local media

- Take steps to ensure that such restrictions on the freedom of peaceful assembly are prohibited in the future.

This Briefing Note is written by CCHR, a non-aligned, independent, non-governmental organization (“NGO”) that works to promote and protect democracy and respect for human rights – primarily civil and political rights – throughout Cambodia.

The ban on assemblies violates Cambodian domestic laws

On 4 January 2014, following the violent crackdown on protesters, the Ministry of Interior issued a press release stating that there was to be a ban on further demonstrations, assemblies, or marches until “*public order and security are restored.*” The Phnom Penh Municipal Hall also sent a letter to Sam Rainsy, President of the opposition CNRP, rejecting the notification of future CNRP protests and stating that the CNRP will not be authorized to hold marches or demonstrations until security and public order are guaranteed.² According to Brigadier General Kenh Tito, Spokesman for the National Military Police, until “*public order and security are restored*” means the ban will be lifted when the CNRP takes its seats in the National Assembly.³

In addition, on 6 February 2014, the Kampong Chhnang Provincial Hall issued a circular on public assembly to political parties, labor unions, NGOs and other associations. The circular instructs that in order to host a public mass assembly, the organizers must request permission from the provincial authorities seven days in advance, to allow them to determine whether the demonstration is “legitimate.” If permission is not requested, “*the competent authorities will take concrete measures against the rally, and its holder shall be responsible for the face of existing law.*”⁴ This is in direct contravention of the 2009 Law on Peaceful Assembly, which requires a five working day notification system.

On 25 February 2014, it appeared that Prime Minister Hun Sen was set to lift the ban on assembly, when during a speech in Preah Sihanouk province, he announced, “*Now, I am not requesting to hold demonstrations, but I will not prevent it,*” adding that he “*must guarantee peace for all, as well as guarantee the right to gather for all.*”⁵ The announcement led to much confusion as to whether the ban had been lifted, including amongst government officials. However, further protests have since been banned, indicating that in practice the ban remains firmly in place.

The right to freedom of assembly is promoted and protected under Cambodian law. Article 41 of the Constitution of the Kingdom of Cambodia (the “Constitution”) provides that “*citizens of Cambodia shall have freedom of expression, freedom of the press, freedom of publication and freedom of assembly. No*

² Mech Dara & Peter Zsombor, ‘Protest Ban Will Last Until Opposition Takes Seats’ *The Cambodia Daily* (22 January 2014) <<http://bit.ly/1jzIVGr>>

³ Ibid

⁴ Ministry of Interior, Circular on public mass rally in Kampong Chhnang province to all political parties, civil society, non-governmental organizations and other associations based in Kampong Chhnang province (6 February 2014)

⁵ Khy Sovuthy & Colin Meyn, ‘Hun Sen Lifts Protest Ban, Warns of Pro-CPP Rallies’ *The Cambodia Daily* (26 February 2014) <<http://bit.ly/1heCg46>>

*one shall take advantage of these rights to harm the honour of others, to affect the good traditions of society, or to violate public order and national security.”*⁶ Article 35 of the Constitution also provides that all Khmer citizens shall have the right to participate actively in the political life of the nation.⁷

In addition, Article 31 of the Constitution states that Cambodia shall recognize and respect the Universal Declaration of Human Rights (“UDHR”) and the covenants and conventions related to human rights,⁸ thereby incorporating the UDHR and the International Covenant on Civil and Political Rights (the “ICCPR”) into domestic law.⁹ The right to freedom of assembly is enshrined in both the UDHR and the ICCPR. Article 20 of the UDHR states that “*everyone has the right to freedom of peaceful assembly and association.*”¹⁰ The right to freedom of peaceful assembly is also guaranteed under Article 21 of the ICCPR.

Restrictions on the right to peaceful assembly must be necessary, proportionate and legitimate

Article 21 of the ICCPR provides guidance on the acceptable restrictions to freedom of assembly, stating that “*no restrictions may be placed on the exercise of this right other than those imposed in conformity with the law and which are necessary*” to ensure “*national security or public safety, public order, the protection of public health or morals or the protection of the rights and freedoms of others.*”¹¹ Moreover, the Implementing Guide to the 2009 Law on Peaceful Assembly states in its Preamble, “*any restrictions that are placed on demonstrations should be appropriate.*”¹²

Mr. Maina Kiai, the United Nations Special Rapporteur on the Rights to Freedom of Peaceful Assembly and of Association, in his report to the Human Rights Council on 21 May 2012, recommended to “*ensure that any restrictions on the rights to freedom of peaceful assembly and of association are **prescribed by law, necessary in a democratic society, and proportionate to the aim pursued, and do not harm the principles of pluralism, tolerance and broadmindedness. Any restrictions should be subject to an independent, impartial, and prompt judicial review.***”¹³ Furthermore, the United Nations Human Rights Committee has stated, “*where such restrictions are made, States must demonstrate their necessity and only take such measures as are proportionate to the pursuance of **legitimate aims** in order to ensure continuous and effective protection of Covenant rights.*”¹⁴ As such, restrictions to the right to

⁶ Constitution of the Kingdom of Cambodia, 21 September 1993. Article 41 <<http://bit.ly/19Ey1Ms>>

⁷ Ibid, Article 35

⁸ Ibid, Article 31

⁹ The direct applicability of international human rights law was reiterated in a 10 July 2007 decision of the Constitutional Council, which states that judges are obliged to consider all Cambodian laws when interpreting laws and making decisions.

¹⁰ Universal Declaration of Human Rights (Adopted 10 December 1948, UNGA Res 217 A (III)) (UDHR), Article 20 <<http://bit.ly/1aRyxCs>>

¹¹ International Covenant on Civil and Political Rights (ICCPR), Article 21 <<http://bit.ly/1eeGc40>>

¹² Ministry of Interior, Implementation Guide to the Law on Peaceful Demonstration, (2009) <<http://bit.ly/190IFJx>>

¹³ OHCHR, Report of the Special Rapporteur on the rights to freedom of peaceful assembly and of association, Maina Kiai (Report) (21 May 2012) <<http://bit.ly/1fd7O6A>>

¹⁴ UNHRC, General Comment No. 31 [80] Nature of the General Legal Obligation Imposed on States Parties to the Covenant, 26 May 2004 <<http://bit.ly/1fYshS>>

freedom of assembly are permitted only in very narrowly defined circumstances and must be proportionate to the aim pursued.

The current ban on all demonstrations, marches and assemblies in any public space constitutes a blanket legal restriction which is overly inclusive and thus **disproportionate**, as no consideration has been given to the specific circumstance of each case. The blanket ban appears excessive especially when protests have thus far only affected certain areas of the city of Phnom Penh.

Furthermore, while a ban on demonstrations, assemblies or marches may be justified and necessary on public order grounds, especially immediately after violent events, this justification loses its relevancy as time passes. For this reason, any ban on marches, demonstrations, and assemblies should be strictly limited in time. On the contrary, while the current ban states it is temporary; the potential end to the ban is subject to a very subjective interpretation of what would qualify as “*public order and security are restored*” as the recent comments of Brigadier General Kenh Tito demonstrate. In the current context, four months after violent clashes took place between police and demonstrators, the ban is clearly **not necessary** anymore.

Given the political deadlock and growing opposition in Cambodia, and the unnecessary and disproportionate nature of the ban on assembly, the legitimate aim of the ban is highly questionable. The current situation in the capital cannot by any stretch qualify as an emergency situation threatening the life of the nation. It thus seems that such a broad ban on assemblies and the subsequent arrests are politically motivated and serve only the purpose of protecting the current government from criticism by garment workers and the political opposition, thus questioning the **legitimacy** of the ban.

Furthermore, in paragraph 25 of his report to the General Assembly on 7 August 2013, Special Rapporteur Maina Kiai, talking about freedom of assembly in the context of elections, noted “*As previously mentioned, blanket bans, which are intrinsically disproportionate and discriminatory, should be prohibited, and restrictions on a peaceful assembly in relation to its “time, place and manner” should be limited to the extent that such restrictions meet the aforementioned strict test of necessity and proportionality.*”

Restrictions on the right to peaceful assembly must be provided by law

Article 37 of the Constitution states “*the rights to strike and to organize peaceful demonstrations shall be implemented and exercised **within the framework of the law**,*”¹⁵ whilst Article 21 of the ICCPR states that “*no restrictions may be placed on the exercise of this right other than those imposed in conformity with the law.*”¹⁶

It is important to note that there are no specific provisions in Cambodian domestic legislation regulating which procedures to follow, or which authority enforces such a ban. Article 12 of the 2009 Law on Peaceful Assembly provides that “*upon discussion, if both parties fail to reach an accord, the competent*

¹⁵ Constitution of the Kingdom of Cambodia, 21 September 1993. Article 37 <<http://bit.ly/19Ey1Ms>>

¹⁶ International Covenant on Civil and Political Rights (ICCPR), Article 21 <<http://bit.ly/1eeGc40>>

municipal or provincial territorial authorities shall request the Minister of Interior to provide a decisive opinion.”¹⁷ However, this provision only concern cases in which someone sent a notification for holding an assembly that is further denied by the local authority and the Ministry of Interior. It does not regulate general bans but only applies on a case-by-case basis.

In addition, Surya P. Subedi, Special Rapporteur on the Situation of Human Rights in Cambodia, recommended in a press statement dated 16 January 2014:

“That the Government clarify the legal basis and justification for such a ban. The Government is reminded that under Article 4 of the International Covenant on Civil and Political Rights, measures derogating from obligations under the Covenant can only be taken to the extent strictly required by the exigencies of the situation, only in regard to public emergencies which threaten the life of the nation and the existence of which is officially proclaimed. I have not seen an official proclamation of a public emergency of such gravity that threatens the life of the nation. In the absence of a legal basis, the ban on demonstrations should be lifted.”¹⁸

Finally, Article 22 of the Constitution states *“When the nation faces danger the king; with the joint approval of the Prime Minister, the President of the National Assembly and the President of the Senate, shall make a proclamation to the people putting the country into a state of emergency.”¹⁹* No state of emergency has been declared legally in Cambodia. In addition, the ban was announced not in an official document but merely via a press release sent by the Ministry of Interior, and has not been provided for by law.

As has been demonstrated, the blanket ban on all assemblies lacks necessity, proportion and legitimacy and thus is not provided for neither by domestic nor international law. As such, the RGC’s current ban on assemblies is unlawful and is a direct attack on the right to freedom of assembly in Cambodia.

Implementation of the ban on assemblies

The lack of legal basis for the ban and lack of clarity over its implementation allows for the right to peacefully assemble to be implemented in a total discretionary fashion. CCHR has found the right to freedom of assembly has been restricted by the RGC in Cambodia since the ban was initially announced on 4 January 2014 to date, by forbidding protests; using violence to disperse crowds; using intimidation; and by temporarily detaining human rights defenders, requiring they sign letters stating they will stop their activities before their release. Restrictions on the right to peaceful assembly have been taking many different forms.

¹⁷ Law on Peaceful Demonstration, Article 12 (2009) <<http://bit.ly/1itCc0t>>

¹⁸ OHCHR, Statement by the United Nations Special Rapporteur on the situation of human rights in Cambodia, Professor Surya P. Subedi (Press Statement) (16 January 2014) <<http://bit.ly/1rreypZ>>

¹⁹ Constitution of the Kingdom of Cambodia, 21 September 1993. Article 22 <<http://bit.ly/19Ey1Ms>>

Discretionary forbidding protests

Since the ban on assemblies, authorities mainly in Phnom Penh have been forbidding certain protests and not others in a discretionary manner, meaning that the right to freedom of assembly can only be enjoyed occasionally and according to the good will of the authorities. It is thus clear that the ban on assemblies is in place only to enable the RGC to suppress all protests planned by its critics.

For instance, a youth demonstration planned for 23 February 2014 had to be downgraded to a press conference after the RGC refused to lift its ban on public assemblies. Five hundred youth had intended to deliver petitions calling for an amended election law that would allow for the direct election of district, city and provincial councilors.²⁰

On 12 March 2014, after Hun Sen's speech which let people to believe the ban was lifted, authorities announced that Freedom Park would remain off limits for protestors indefinitely; further evidencing that, the ban on public assembly was not being lifted.²¹ The RGC repeatedly has cited security concerns for its refusal to allow demonstrations in Freedom Park, despite the fact that every protest that has occurred there since July's disputed election has remained peaceful. Phnom Penh municipality has rejected several requests to hold public gatherings in Freedom Park – by labor unions and associations, as well as the radio station owner Mam Sonando.²²

On 24 March 2014, City Hall once again refused to authorize a protest planned by Mam Sonando, citing the need to restore public order. Sonando, who has repeatedly asked permission to protest the Ministry of Information's decision to refuse granting him wider radio coverage and a television license, was informed by Phnom Penh Deputy Governor Khuong Sreng that the demonstration should be postponed. However, he was not given an alternative date when requested. Spokesman Long Dimanche announced that a demonstration could not go ahead until "*the situation and public order are completely back to normal,*" and until investigations into the killings of the protesting garment factory workers that took place in early January are complete.²³

While the ban remains in place, the sphere of freedom of assembly remains lawless. In practice, the ban on assemblies appears to have suspended the implementation of the 2009 Law on Peaceful Assembly. The ban in Kampong Chhnang province in particular, illustrates that the right to assembly is currently denied or granted based on decisions by the executive rather than the implementation of the law.

Intimidation and use of violence

Forbidding protests on the basis of the current ban on assemblies empowers the RGC to violently disband protests. For instance, on 8 March 2014, authorities prevented a planned public forum on garment industry issues for International Women's Day from taking place. At 7am police blocked off the

²⁰ Vong Sokheng, 'Youth told demo can't be on street' *The Phnom Penh Post* (17 February 2014) <<http://bit.ly/1kNDVAw>>

²¹ Mom Kunthea, 'Freedom Park off-limits: city' *The Phnom Penh Post* (13 March 2014) <<http://bit.ly/1cEkgk2>>

²² Kuch Naren & Mech Dara, 'Obfuscation Reigns Over Ban on Demonstration' *The Cambodia Daily* (6 March 2014) <<http://bit.ly/OPGJl>>

²³ Kuch Naren, 'City Hall Rejects Mam Sonando's Protest Plan' *The Cambodia Daily* (25 March 2014) <<http://bit.ly/1gww7ln>>

park and side streets leading there; an hour later, black helmet-clad Daun Penh district security guards arrived to forcibly break up the crowd that had gathered near the blockade.²⁴

On 27 January 2014, a peaceful rally outside the Ministry of Information, led by Mam Sonando, was violently dispersed at approximately 10am. Hundreds of military police charged at the crowd, utilizing their batons and smoke canisters to disband the rally. The helmet-clad Daun Penh district security guards were also involved in the dispersing of the rally, using their batons against attendees and journalists who were present. The use of violence left over 10 persons injured.²⁵

On 26 January 2014, security forces beat protestors trying to gather in Freedom Park with truncheons and stunned them with electric cattle prods. A protestor kicking a helmeted security guard in the groin near Naga Bridge sparked the clashes. Nine unions and associations were gathering to demand the release of the 23 people detained in early January, and a \$160 minimum wage for all Cambodian workers. A week prior, the government had rejected their application to hold the demonstration.²⁶

Intimidation of violence has also been used to prevent rallies from taking place. For instance, a meeting of the opposition CNRP in Troeuy Sla commune in Kandal province was cancelled on 21 January 2014 after several hundreds of Cambodian People's Party ("CPP") supporters and riot and military police armed with tear gas canisters, shields and batons were present at the meeting venue. The meeting was postponed, shortly before CNRP leaders were scheduled to arrive, reportedly to avoid violence, in light of the heavy presence of security forces.²⁷ The CNRP had received approval for the meeting from Interior Minister Sar Kheng earlier on 21 January 2014; however, in practice the display of numerous threatening security forces and CPP supporters was a clear dissuasive message aiming at restricting the opposition's right to peaceful assembly. Similar tactics of intimidation were used to prevent meetings with Kem Sokha, Vice President of the CNRP, on 26 January 2014 in Kampong Cham province.²⁸

In addition, of serious concern is the systematic use of private, untrained security personnel hired by Phnom Penh Municipal Hall, to forcibly break up demonstrations and make arrests in Phnom Penh. According to Long Dimanche, the Phnom Penh Municipal spokesman, the civilian security forces have had no security training, although they have received legal and administrative training. Dimanche refused to elaborate on what that training has involved, the size of the force at the Municipal Hall's disposal or when the directive was issued. The untrained forces are often armed with batons and metal bars to forcibly crackdown on protestors. They are usually recognizable by their nondescript uniforms and black helmets, however even some of the security guards wearing clearly marked Daun Penh district uniforms have reported having received no security training for the job and were uncertain as to where

²⁴ Mech Dara, 'Protest Ban Firmly in Place on Women's Day' *The Cambodia Daily* (10 March 2014) <<http://bit.ly/1gf8N9Y>>

²⁵ Khouth Sophak Chakrya & Kevin Ponniah, 'Rally violently dispersed' *The Phnom Penh Post* (28 January 2014) <<http://bit.ly/1iF64Jy>>

²⁶ Sean Teehan and Daniel Quinlan, 'More violence at freedom Park' *The Phnom Penh Post* (26 January 2014) <<http://bit.ly/1kf1ssi>>

²⁷ Phann Ana & Aun Pheap, 'CNRP Cancels Meeting as CPP Supporters Turn Out in Force' *The Cambodia Daily* (22 January 2014) <<http://bit.ly/1m3dvc7>>

²⁸ May Titthara & Stuart White, 'No talks amid violence: Sokha' *The Phnom Penh Post* (28 January 2014) <<http://bit.ly/1mrsK1n>>

their salaries come from.²⁹ The lack of training raises grave concerns, as they have no knowledge on how to properly manage crowds. Moreover, as the untrained security forces are privately hired, once they employ violence, as is often the case, there is no way of knowing whom they are accountable to, which reinforces the culture of impunity.

Temporary arrests of protesters

On 6 January 2014, five land rights activists from Boeng Kak Lake were temporarily arrested in Phnom Penh. At 8.00 am, Tep Vanny, Yorm Bopha, Bo Chhorvy, Phan Chhunreth and Song Srey Leap started a march to the French Embassy asking for the release of Vorn Pao and nine other peaceful demonstrators previously arrested on 2 January. The five activists were arrested by the police at around 8.40 am and immediately taken to the Phnom Penh Municipal Police Station. They were released at 4.45 pm only after they agreed to sign a letter stating that they would temporarily not engage in further protests.³⁰

On 19 January 2014, Sok Chhun Oeung, acting President of the Independent Democracy of Informal Economy Association (“IDEA”), was arrested while attempting to hold a vigil for the 23 persons that have been detained since the violent clashes of 2 and 3 January 2014. He was detained overnight at the Phnom Penh Municipal Police Station and released after signing a similar letter.³¹

On 21 January 2014, eleven human rights activists and peaceful protesters were temporarily arrested by Daun Penh security guards and taken to the Phnom Penh Municipal Police Station. The 11 arrested were Boeng Kak Lake rights activists Tep Vanny, Yorm Bopha, Song Srey Leap, Phan Chhunreth, Pong Sopheap, Erm Sreytouch, Bov Sorphea, and Ngoun Kimlang; Cambodian Independent Teachers Association (“CITA”) President Mr. Rong Chhun; Cambodian Alliance of Trade Unions (“CATU”) member Cheang Thida; and Housing Rights Task Force (“HRTF”) member Ms. Long Kimhaeng. The first six arrests took place in front of the United States Embassy during a demonstration to deliver a petition calling for the release of the 23 activists and strikers, imprisoned in early January. The five others were arrested about 10 minutes later while making their way to the French Embassy. All eleven people were released in the afternoon after signing a letter stating they would not incite or participate in further illegal activities or demonstrations.³²

On 22 February 2014, seven youths – two female and five male – were temporarily detained in Phnom Penh while marching to call for peace. The youths were members of an organization called Club of

²⁹ Khouth Sophak Chakrya & Shane Worrell, ‘Untrained guards rule at protests’ *The Phnom Penh Post* (23 January 2014) <<http://bit.ly/1fcN6Ut>>

³⁰ CCHR, Conditional Release of Human Rights Defenders Violates Fundamental Rights to Freedom of Expression and Assembly (Briefing Note) (05 February 2014) <<http://bit.ly/1g4udlw>>

³¹ Khouth Sophak Chakrya & Sean Teehan, ‘Union leader released’ *The Phnom Penh Post* (20 January 2014) <<http://bit.ly/1joXtfi>>

³² Phorn Bopha & Colin Meyn, ‘11 Activists Arrested for Views That ‘Impact Public Order’ *The Cambodia Daily* (22 January 2014) <<http://bit.ly/NMvpnl>>

Khmer Youth Mohanokor, which promotes youth advocacy and social justice. They were released the same day, but only after signing documents promising not to march without permission.³³

On 5 March 2014, three former Boeng Kak Lake community residents were temporarily detained after they parked a tuk-tuk mounted with loudspeakers outside City Hall to call for Phnom Penh Governor Pa Socheatvong to provide additional compensation for the loss of their homes through forced eviction. Daun Penh district's civilian security guards detained them at the municipal police headquarters, where they were held for several hours.³⁴

The temporary detention of human rights defenders and peaceful protesters, and the requirement to sign a letter stating they will stop their activities is a clear attempt at restricting the environment in which human rights defenders operate and a clear attempt at putting an end to their activities.

Conclusions and recommendations

The current blanket ban on all assemblies, demonstrations and marches declared by the Ministry of Interior has no legal foundation, and violates the RGC's obligations under domestic and international law as it is grossly disproportionate, excessively broad, and has no legitimate aim. The current ban is still being implemented despite Hun Sen's speech to the media. The confusion around the current situation, regarding the legality of the ban or whether it is still in place, allows the RGC to discretionally forbid, disband and arrest protesters. It is clear that such a broad ban on assemblies is politically motivated and serves only the purpose of protecting the current government from criticism by garment workers and by the political opposition. The ban on assemblies and the restricting tactics described above are direct attacks to the right to freedom of peaceful assembly in Cambodia. As such, CCHR recommends that, the RGC should:

- Immediately formally repeal the current ban of all assemblies, marches and demonstrations in Cambodia;
- Halt the unlawful temporary detention of peaceful protesters and immediately release those human rights defenders that remain in detention for participating in peaceful protests;
- Put an end to the practice of forcing human rights defenders and citizens exercising their fundamental rights to freedom of expression and assembly from signing statements that restrict their rights in order to be released or avoid charges;
- Cancel such letters previously signed and consider them as null and void;
- Put an end to all political and judicial harassment and violence against peaceful protestors and human rights defenders;
- Ensure security personnel have received appropriate training and put an end to the hiring of private security forces;

³³ Hul Reaksmeay & Mech Dara, 'Events Promoting Peace Stopped by Authorities' *The Cambodia Daily* (24 January 2014) <<http://bit.ly/1rrjafZ>>

³⁴ Kuch Naren & Mech Dara, 'Obfuscation Reigns Over Ban on Demonstration' *The Cambodia Daily* (6 March 2014) <<http://bit.ly/OPGJl>>

- Take steps to ensure that such restrictions on the freedom of peaceful assembly are prohibited in the future; and
- Ensure the right to freedom of assembly is fully respected and comply with and ensure that existing laws are properly implemented, applied and respected.

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