

Fact Sheet: Right to Freedom of Assembly - Freedom Parks**Fundamental Freedom:** Freedom of Assembly, Freedom of Expression

Snapshot: The introduction of the Law on Peaceful Demonstration in 2009 instigated fears that the establishment of “Freedom Parks” – designated spaces for holding peaceful assemblies – would lead to demonstrations being largely restricted to such locations. Not only has this fear been borne out in the years since, but the designated space – of which there is still only one – has also been re-located to a remote area of Phnom Penh, with use of the space increasingly denied arbitrarily, further undermining the rights to peaceful assembly and expression.

Introduction

Following the adoption of the Law on Peaceful Demonstration (“LPD”) in November 2009, the Cambodian Center for Human Rights (CCHR) [highlighted](#) its concerns about the LPD’s creation of “Freedom Parks” and the potential implications for the exercise of the rights to freedom of assembly and freedom of expression in Cambodia. According to Article 2 of the LPD, its purpose is “to assure freedom of expression of Khmer citizens through peaceful assembly”, whilst the accompanying [Implementation Guide](#) states that “this law is an enabling law that will ensure that demonstrations can take place in a peaceful manner”. Regrettably however, this has not been the case since the LPD’s entry into force. It has not only been used to confine peaceful gatherings and demonstrations to Freedom Park, but increasingly, the very use of Freedom Park has been restricted and denied.

Democracy is lived through everyday participation in society, and requires that individuals can express their views, assemble peacefully, organize and engage in public debate. As Cambodia approaches the 2027 Commune/Sangkat Council elections and the 2028 National Assembly elections, the protection of fundamental freedoms is particularly important. Restrictions on peaceful gatherings therefore risk limiting the democratic space in which Cambodians can exercise their agency and participate meaningfully in public and political life, reducing democracy to the act of voting alone. The upcoming elections serve as an opportunity to respect the rights to freedom of expression, assembly and association, as highlighted by the UN Special Rapporteur to Cambodia Thomas Andrews¹.

The rights to freedom of assembly and freedom of expression in domestic & international law

The right to freedom of assembly is a fundamental human right which allows individuals to express themselves collectively around a shared belief or idea about their society, exercising individual autonomy in solidarity with others. It is intrinsically linked to the right to freedom of expression, and together, they form the bedrock of democratic societies. The rights to freedom of expression and assembly are protected under Cambodian law. Article 41 of the Cambodian Constitution states that all citizens shall have freedom of expression and freedom of assembly. Article 35 provides that all Khmer citizens shall have the right to participate actively in the political life of the nation. Article 31 states that Cambodia shall recognize and respect the Universal Declaration of Human Rights (UDHR) and the covenants and conventions related to human rights, incorporating them into law. As a result, the provisions of the UDHR and the International Covenant on Civil and Political Rights (ICCPR), ratified

¹ [Office of the United Nations High Commissioner for Human Rights, End-of-Mission Statement by the UN Special Rapporteur on the Situation of Human Rights in Cambodia, Tom Andrews, 31 July 2026](#)

by Cambodia in 1992, are guaranteed and applicable under domestic law.² Article 19 of both the UDHR and the ICCPR guarantees everyone the right to freedom of expression, while Article 20 of the UDHR and Article 21 of the ICCPR respectively provide for the right to freedom of assembly.

Analysis of the LPD, “Freedom Parks” and international human rights law

According to Article 3 of the LPD, its scope extends to “all peaceful gatherings or marches for demonstration”, with the exception of those taking place as part of electoral campaigns, those related to labour disputes and parades, funeral processions and “other gatherings for the purposes of serving religion, art, culture, national customs and tradition”. These exclusions sit uneasily with the broad protection afforded to peaceful assemblies under international human rights law, including “demonstrations, protests, meetings, processions, rallies, sit-ins, candlelit vigils and flash mobs”. The Human Rights Committee has clarified that assemblies may be held for a wide range of purposes, including expressing views, conveying positions on particular issues, exchanging ideas, or affirming group solidarity or identity, and may also pursue entertainment, cultural, religious or commercial objectives while remaining protected under Article 21 of the ICCPR³.

Article 4 of the LPD states that “peaceful assembly” refers to “a gathering or a march conducted by a group of people to publicly demand, protest or express their sentiments, opinions or will by using various forms or means peacefully”. No distinction is provided between “peaceful gatherings and marches” (Article 3) and “peaceful assembly” (Article 4). For peaceful assemblies of fewer than 200 people, Article 14 stipulates that they can be held in Freedom Parks, and require written notification to the municipal or provincial authority at least 12 hours in advance. According to the LPD Implementation Guide, they must be “compounds or centers that the general public can easily hear and see”, “in the center of the municipality or provincial capital” and “should not be in a quiet place, demonstrators have a right to be heard”. Furthermore, the LPD also provides that each capital and province must establish a Freedom Park by 6 June 2010. More than 15 years later, however, CCHR is aware of only one Freedom Park in the country, located in Phnom Penh.

CCHR has also noted that a number of the LPD’s provisions related to Freedom Parks are contrary to international human rights standards or are not enforced in practice, specifically regarding: location and authorization.

- **Location**

The designation of a specific space for holding peaceful assemblies becomes problematic when this designation becomes the rule, whereby assemblies *not* held in this space are prohibited from taking place. In its General Comment no. 37, the Human Rights Committee (HRC) asserts that peaceful assemblies may in principle be conducted in all spaces to which the public has access or should have access, and that “there can be no blanket ban on all assemblies... in all public places except one specific location within a city or outside the city center”.⁴ Assemblies are a legitimate use of public space and

² Constitutional Council of the Kingdom of Cambodia, Decision No. 092/003/2007 ([CCC, 10 July 2007](#)), p.2: “The term “Laws” as above referred to means the national laws, including the Constitution which is the supreme law, all the laws that remain in force, and the international laws already recognized by the Kingdom of Cambodia.”

³ Human Rights Committee, General Comment No.37, ([CCPR/C/GC/37](#)), 17 September 2020, §6

⁴ Ibid, §55

by their nature, are inherently disruptive, to a certain extent. Such disruptions must therefore be accommodated within reason.⁵ As CCHR has [documented](#) since 2016, notifications to municipal authorities in Phnom Penh about [planned assemblies](#) in locations other than Freedom Park are often met with orders that the assembly cannot go ahead in the [intended location](#) and should instead take place at Freedom Park.⁶

Despite the LPD's abovementioned explicit provisions for the central location of Freedom Parks, the relocation of Phnom Penh's Freedom Park in 2017 directly contravened these provisions. It was relocated from the capital's central Daun Penh district – close to national institutions and foreign embassies – to a location 5km away, along National Road 5, surrounded by warehouses and industrial buildings. The move was ordered because the authorities [claimed](#) that the initial location was bad for business, tourism and caused ["anarchy"](#). The relocation of Phnom Penh's Freedom Park is therefore contrary not only to the LPD, but also to international human rights law, which provides that "peaceful assemblies should not be relegated to remote areas where they cannot effectively capture the attention of those who are being addressed, or the general public".⁷

- **Authorization**

According to international human rights law, peacefully assembling or demonstrating is not an act that requires permission from the authorities. To require such would, in many cases, nullify the very purpose and principle of protest. Whilst Articles 5-7 of the LPD encouragingly use the term "shall" in relation to the submission of notification letters to the relevant authorities, this is undercut by Article 20, which states that "although a demonstration proceeds peacefully, if no notification letter is received in accordance with article 5, 6 and 14 of this law, competent authorities may take actions to cease such a demonstration". Furthermore, Section II (1) of the Implementation Guide in relation to Article 5, includes a notable shift from "shall" to state that "individuals wishing to organize a peaceful demonstration at a public location *must* notify the competent municipal or provincial authorities in writing".

Notification systems should serve the purpose of allowing the authorities to fulfill their positive obligation to facilitate peaceful assemblies and protect the rights of others.⁸ As stated by the Human Rights Committee, "notification regimes, for their part, must not in practice function as authorization systems".⁹ This would appear to be the case under the LPD, however. Such authorization requirements in domestic law are incongruent with States' obligations under international human rights standards, according to which "national laws should not require prior authorization for assemblies and must also enable the holding of spontaneous assemblies".¹⁰

In its nine years of systematically monitoring the enjoyment of fundamental freedoms, CCHR has

⁵ Ibid, §47

⁶ CCHR, CCHR, Cambodia Fundamental Freedoms Monitor – 2016 Annual Report, (August 2017), p.18 <https://tinyurl.com/FFMP-2016-17>

⁷ CCPR/C/GC/37 §53 - 55

⁸ CCPR/C/GC/37 §70 - 74

⁹ CCPR/C/GC/37 §73

¹⁰ UN Human Rights Council, Model Protocol for Law Enforcement Officials to Promote and Protect Human Rights in the Context of Peaceful Protests ([A/HRC/55/60](#)), §18

noted that in recent years, further to restricting peaceful assemblies to taking place in Freedom Park, those planning such gatherings are being informed by the authorities that they cannot hold them even in Freedom Park.¹¹ On some occasions they have also been [physically](#) prevented from accessing it. In September 2020, groups intending to participate in a peaceful assembly at Freedom Park to protest the arrest of human rights defenders, found the area [barricaded and guarded](#) by police officers. According to City Hall, this was necessary to maintain security and public order, but the restriction was [denounced](#) by a number of UN Special Rapporteurs. In April 2024, the Phnom Penh authorities [prevented](#) the Nation Power Party (NPP) from using Freedom Park to hold a peaceful assembly calling for the release of imprisoned party members. On 23 April 2025, the Nation Power Party (NPP), planning to mark International Labour Day on 1 May, was informed by Phnom Penh Municipal Authorities that Freedom Park was [not a place for celebrations](#), and it therefore could not be used. Two days later, the authorities used the same reason in response to a notification letter submitted by a group of civil society organizations (CSOs), stating their intent to use Freedom Park to mark International Labour Day. The CSOs clarified that they wished to hold a public peaceful gathering, to which the authorities responded that the notification process hadn't been adequately followed and that the CSOs should hold the event at their offices. The CSOs were ultimately granted access to a different location. This "celebration" caveat, and the direction to hold the gathering at the organizer's offices, was also [cited](#) by in September 2024, in response to the Cambodian Independent Teacher's Association (CITA)'s notification letter of their intent to use Freedom Park, despite the fact that the Association holds its World Teacher's Day celebration there every year.

Since the Cambodia – Thailand border conflict erupted in July 2025, there was no a single use of Freedom Park has been allowed. CCHR documented multiple event intended to organize at Freedom Park were denied by the authority. In September 2025, the CITA once again notified the Phnom Penh authority about the use of Freedom Park to hold the [World Teachers' Day celebration](#) on 5 October 2025, with 150 participants. The organizers were invited for a meeting at the Phnom Penh Municipality on 30 September to discuss their plan. The authority stressed that, due to the challenges Cambodia was facing from the invasion by Thailand CITA should instead hold the event at its office. Similarly, the same reason was used to deny permission for a group of 22 CSOs to hold the 34th anniversary of the Paris Peace Agreement at Freedom Park on 19 October 2025. Instead, the Phnom Penh authorities

¹¹ CCHR, Cambodia Fundamental Freedoms Monitor – 2023 Annual Report, (April 2024), p.23 – 24, <https://tinyurl.com/FFMP-2023>
 CCHR, Cambodia Fundamental Freedoms Monitor – 2022 Annual Report, (September 2023) p.21-22, <https://tinyurl.com/FFMP-2022>
 CCHR, Cambodia Fundamental Freedoms Monitor – 2021 Annual Report, (April 2022) p.24 <https://tinyurl.com/FFMP-2021>
 CCHR, Cambodia Fundamental Freedoms Monitor – 2020 Annual Report, (April 2021), p. 23 - 24, <https://tinyurl.com/FFMP-2020>
 CCHR, Cambodia Fundamental Freedoms Monitor – 2019 Annual Report, (July 2020) p.31 - 32, <https://tinyurl.com/FFMP-2019-20>
 CCHR, Cambodia Fundamental Freedoms Monitor – 2018 Annual Report, (July 2019) p.32, <https://tinyurl.com/FFMP-2018-19>
 CCHR, Cambodia Fundamental Freedoms Monitor – 2017 Annual Report, (September 2018) <https://tinyurl.com/FFMP-2017-18>
 CCHR, Cambodia Fundamental Freedoms Monitor – 2016 Annual Report, (August 2017), p.17 – 18, <https://tinyurl.com/FFMP-2016-17>

instructed the CSOs to hold the event at their offices or any other private places.¹² In October 2025, the [Nation Power Party](#) also intended to hold the 34th Anniversary of the Paris Peace Agreements at Freedom Park. It was, however, prevented from holding the event at its intended location. No specific reason was given for the denial, but the party was asked to hold the celebration in its office instead.

On 27 February 2026, a group of CSOs working to promote human rights, labour rights and women's rights submitted a letter to the Phnom Penh authorities notifying them of their intention to use the Freedom Park for the celebration of the 115th International Women's Day on 8 March 2026. The group planned to have 500 participants at their event but was [refused permission by the Phnom Penh authorities](#) in a letter to the group of organizers on 4 March. On 6 March, the CSO group issued an [open letter](#) clarifying that the gathering would be pursued as planned and requested the authorities to fulfill their obligation to maintain order at Freedom Park on 8 March. After the open letter was made public, the Phnom Penh authorities invited the CSO group to a meeting on 7 March to discuss the plan, which was ultimately granted other location to host the event.

It is worth noting that these efforts to restrict the use of Freedom Park are occurring in an environment in which peaceful marches, particularly those seeking to raise grievances or advocate for rights, continue to face stringent restrictions. Most recently, on International Labour Day on 1 May 2026, around 200 workers and trade union representatives attempting to march to several embassies and government institutions in Phnom Penh [were blocked by district security guards](#). Authorities reportedly informed organizers that only around ten people would be permitted to walk and submit petitions. A subsequent attempt by participants to walk from the US Embassy to the Council for the Development of Cambodia was again blocked. At the same time, large-scale marches on other issues have been permitted, including peace marches relating to the Cambodia-Thailand border conflict in 2025. This differing treatment raises concerns regarding the consistent and non-discriminatory application of restrictions on peaceful assembly. It also highlights the potential impact of designating specific locations for peaceful demonstrations and insisting on their use, as such requirements can facilitate restrictions on assemblies and marches held elsewhere.

Based on the experience of CSOs in their attempts to engage with the authorities to facilitate gatherings, the authorities often conduct themselves in a manner that is seemingly aimed at having an intimidating effect on the CSOs and their members. One such example is that the authorities will call a meeting with CSO representatives, in which a small number of CSO staff will be greatly outnumbered by Government officials, many of whom are high-ranking. Similarly, when the authorities call CSO representatives to hear their decision and explanation, the representatives are often not given sufficient time to speak or engage in discussion about the decision. Concerns regarding such practices have been raised by the previous UN Special Rapporteur on the situation of human rights in Cambodia, Mr. Muntarbhorn, who reported that groups had faced intimidation and, in 2025, recommended that the Government instruct local authorities to stop monitoring and intimidating stakeholders engaging with CSOs¹³. Such conduct seems to be aimed at creating a dynamic whereby CSOs are expected to seek the approval of the authorities in order to hold a gathering, in contravention

¹² Minute of the meeting on the request for permission to mark the 34th anniversary of the Paris Peace Agreement at Freedom Park of 22 Associations and Non-Governmental Organizations.

¹³ [UN Human Rights Council, Situation of Human Rights in Cambodia: Report of the Special Rapporteur on the Situation of Human Rights in Cambodia, Vitit Muntarbhorn, A/HRC/60/86, 23 July 2025](#)

of human rights law and standards.

Conclusion

In the years since the LPD entered into force, not only have the initial concerns about the misuse of Freedom Parks materialized, but now even the use of such designated spaces is becoming increasingly difficult for those seeking to hold demonstrations there. This is despite the fact that organizers are seeking to engage with the relevant authorities to inform them of their plans, so that such assemblies can be peacefully conducted and facilitated by the authorities, as is their obligation under the international human rights treaties they have committed to uphold. Instead, organizers are being “denied permission” to use Freedom Park, despite the fact that peaceful assemblies do not require permission. Such denials are particularly concerning given that there remains just one Freedom Park, despite the LPD stipulating that each province should have one. The continued erosion of the right to freedom of assembly, and thus freedom of expression, undermines the rights of all Cambodians, not only those seeking to participate in a demonstration. With Cambodia entering its next electoral cycle, ensuring that citizens have the ability and adequate space to express their views, assemble and participate in public debate is particularly important. As emphasized by the former UN Special Rapporteur to Cambodia, meaningful political liberalization requires respect for freedom of expression and peaceful assembly, alongside greater participation, inclusivity and people-led checks and balances.

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