

# NGO LAWS & CRACKDOWNS ON HUMAN RIGHTS DEFENDERS: INTERNATIONAL LESSONS FOR CAMBODIA

A LICADHO Briefing Paper  
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**LICADHO**

CAMBODIAN LEAGUE FOR THE PROMOTION  
AND DEFENSE OF HUMAN RIGHTS

## **Cambodian League for the Promotion and Defense of Human Rights (LICADHO)**

LICADHO is a national Cambodian human rights organization. Since its establishment in 1992, LICADHO has been at the forefront of efforts to protect civil and political and economic and social rights in Cambodia and to promote respect for them by the Cambodian government and institutions. Building on its past achievements, LICADHO continues to be an advocate for the Cambodian people and a monitor of the government through wide ranging human rights programs from its main office in Phnom Penh and 12 provincial offices.

LICADHO pursues its activities through two program departments:

### **Department of Monitoring and Protection:**

- **Monitoring of State Violations and Women's and Children's Rights:** monitors collect and investigate human rights violations perpetrated by the State and violations made against women and children. Victims are provided assistance through interventions with local authorities and court officials.
- **Paralegal and Legal Representation:** victims are provided legal advice by our paralegal team and in key cases legal representation by our human rights lawyers.
- **Prison Monitoring:** researchers monitor 18 prisons to assess prison conditions and ensure that pre-trial detainees have access to legal representation.
- **Medical Assistance:** a medical team provides medical assistance and referrals to prisoners and prison officials in 12 prisons and victims of human rights violations.

### **Department of Communication and Advocacy:**

- **Community Training, Education and Advocacy:** advocates raise awareness to specific target groups, support protection networks at the grassroots level and advocate for social and legal changes with women and youth.
- **Public Advocacy and Outreach:** human rights cases are compiled into a central electronic database, so that accurate information can be easily accessed and analyzed, and produced into periodic public reports (written, audio and visual).

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### ***Background Information***

In October 2004, the Special Representative of the UN Secretary-General on Human Rights Defenders, Hina Jilani, tabled a report on the status of human rights defenders worldwide. Her report highlighted a number of factors which allow for government crackdowns on human rights defenders' work. All of these factors are present in Cambodia:

- "...weaknesses in the law and legal processes,
- limitations on the competence and independence of the judiciary,
- the lack of awareness or accountability among local authorities for the respect of international human rights standards, and
- weaknesses in civil society".

Her report focused in particular on a worrying trend by various governments to use 'NGO laws' to restrict the activities of human rights NGOs, and highlighted a number of measures which have caused problems in other countries, including:

- "...the criminalization of non-registered human rights groups;
- unnecessarily burdensome and lengthy registration procedures;
- limits on the creation of networks;
- inappropriate denial of registration;
- limited independence of registration authorities;
- requirements to re-register when new legislation is introduced;
- State scrutiny of and interference with an organization's management, objectives and activities;
- administrative and judicial harassment;
- restrictions on access to funding;
- restrictions on cooperation with international human rights partners".<sup>1</sup>

All of the key concerns above could well result from the passage of an NGO Law in Cambodia. In some cases provisions in such laws are directly contrary to the guarantees of freedom of expression and assembly in the International Covenant on Civil and Political Rights, which Cambodia has ratified. In other cases the provisions are not objectionable on their face, and are similar to those in place in Western democracies, but they are problematic in less democratic countries when they are manipulated by politicized government agencies, or when there is no potential for review by an independent judiciary.

In the Cambodian context any NGO law – regardless of its particular content – poses a threat to the work of human rights defenders and other NGOs. While human rights defenders are most at risk because of their role in continually criticizing government actions, the objectives of all NGOs and development agents – both foreign and domestic – can be compromised. And government claims that NGO Laws are enacted to promote legitimate and effective civil societies are rarely borne out. As Hina Jilani noted in 2006, "Far from being used to give legal basis to NGOs and guarantee their rights, domestic legislation has been enforced to keep them under strict control ... where legislation on freedom of association appears to be in accordance with international law, registration requirements have been used arbitrarily or restrictively to void legal protection for those human rights NGOs that are most critical against the Government."<sup>2</sup>

Civil societies around the world have faced similar threats to Cambodia in recent years, and some examples of their varying experiences are provided below. Russia's new NGO Law has been used

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<sup>1</sup> Report of the Special Representative of the Secretary-General on Human Rights Defenders, Hina Jilani, October 1, 2004, A/59/401, p2.

<sup>2</sup> Report of the Special Representative of the Secretary-General on Human Rights Defenders, Hina Jilani, October 23, 2006, E/CN.4/2006/95, p15.

to intimidate and shut down local NGOs critical of the government, while forcing international organizations ranging from Amnesty International to Médecins Sans Frontières and the Danish Refugee Council to suspend their operations whilst awaiting “re-registration”. In Ethiopia, a pending NGO Law criminalizes a range of legitimate civil society activity, and targets in particular foreign and foreign-funded NGOs. In Asian countries such as China, Thailand, and Malaysia, the government has used registration requirements to restrict the activities of civil society organizations critical of government, even though those countries’ laws theoretically protect freedom of assembly and association.

Yet restrictive NGO Laws are not an inevitability, and can be prevented with a concerted effort from civil society. In Nepal, India, and Bangladesh, the governments recently attempted to introduce NGO laws which would likely have similar effects to the others described here, but they met with considerable resistance from NGOs, donor agencies and the international community. In Nepal and Bangladesh the controversial bills were eventually withdrawn; in India the law has yet to be passed or implemented, and now appears to have been placed on hold.

Cambodia would be wise to heed the lessons of its peers on the dangers of government regulation of civil society, and NGOs both local and international - as well as their supporters - should take action to ensure that Cambodia’s vibrant civil society is not suffocated by repressive, restrictive and unnecessary legislation.

### **Russia: NGO Law cracks down on dissent and international NGOs**

In Russia, a highly-restrictive NGO Law (officially entitled “On Introducing Amendments into Certain Legislative Acts of the Russian Federation”) was passed in January 2006 and came into effect on April 15 of that year. As with previous Cambodian draft NGO Laws, it contains registration and reporting procedures that are complex enough to take up huge amount of NGO time and money, but that are also vague enough to allow for arbitrary interpretation by the authorities.

Under the new law, organizations must complete around 100 pages of documents to register, including detailed personal information about each member – including the death certificates of any founder members that are deceased.<sup>3</sup> The law also permits the authorities to deny registration to a foreign NGO if they decide that its “goals and objectives . . . create a threat to the sovereignty, political independence, territorial integrity, national unity, unique character, cultural heritage and national interests of the Russian Federation.”<sup>4</sup>

By June 29, 2006, 40 foreign NGOs had applied for registration - and every single one was turned down by the authorities for supposedly failing to meet the requirements correctly.<sup>5</sup> When an October 2006 registration deadline passed, nearly 100 NGOs, including numerous high-profile international organizations, had still not been accepted and were forced to shut down. Amongst others, Amnesty International, Human Rights Watch, Médecins Sans Frontières, the Danish Refugee Council, the National Democratic Institute for International Affairs and the International Republican Institute were forced to suspend their operations pending attempts at re-registration. HRW, for example, had to stop interviewing victims of human rights violations, and Amnesty was forced to postpone several campaigns, while MSF had to halt some of its humanitarian work in Chechnya and a program in Moscow involving homeless children.<sup>6</sup>

<sup>3</sup> Alison Kamhi, *The International Journal of Not-for-Profit Law*, Volume 9, Issue 1, December 2006, “The Russian NGO Law: Potential Conflicts with International, National, and Foreign Legislation”, at [http://www.icnl.org/KNOWLEDGE/IJNL/vol9iss1/art\\_6.htm](http://www.icnl.org/KNOWLEDGE/IJNL/vol9iss1/art_6.htm)

<sup>4</sup> International Center for Not-for-Profit Law, February 17, 2006, “Analysis of Law # 18-FZ:L On Introducing Amendments to Certain Legislative Acts of the Russian Federation”, at [http://www.icnl.org/knowledge/news/2006/01-19\\_Russia\\_NGO\\_Law\\_Analysis.pdf](http://www.icnl.org/knowledge/news/2006/01-19_Russia_NGO_Law_Analysis.pdf)

<sup>5</sup> Kamhi, *Ibid.*

<sup>6</sup> Henry Meyer, *Associated Press*, October 19, 2006, “About 100 NGOs suspended in Russia”, at [http://www.boston.com/news/world/europe/articles/2006/10/19/about\\_100\\_ngos\\_suspended\\_in\\_russia](http://www.boston.com/news/world/europe/articles/2006/10/19/about_100_ngos_suspended_in_russia)

In addition to the registration requirements, the new law gives the government huge powers to interfere in the daily operation of the organizations. It gives the government the power to demand the NGO's internal documents, and to have government representatives present at any NGO event, including internal meetings.<sup>7</sup> NGOs must also file detailed annual activity and financial reports to the government, including accounting for every penny of foreign donations received – thereby effectively preventing anonymous donations.<sup>8</sup> It has been estimated that the new reporting system will cost volunteer organizations in Russia some 6.9 billion rubles (\$230m) a year, and that some 70 to 80 percent of Russia's NGOs stand to be closed because they lack the resources to follow the onerous new procedures for reporting and auditing.<sup>9</sup>

Even where the new requirements are met, the law is already being used to target organizations critical of the government. For example, ERC Bellona, an independent Russian NGO that has questioned the government's environmental record, was placed under investigation in July 2007 on spurious charges of tax evasion after being subjected to a supposedly random "spot check" by federal registration authorities. The authorities claimed that Bellona was now liable for "advertising" taxes simply because it had acknowledged the support of the British and Dutch consulates to a training program for environmental journalists.<sup>10</sup>

More worrying still, just as in Cambodia, are the attempts to link NGOs to "terrorism" or "extremism". Just a few weeks after the law was passed, a court convicted the executive director of the Russian-Chechen Friendship Society on "race hate" charges, for publishing non-violent articles by Chechen separatist leaders. The Society had long been critical of the government's policy in Chechnya, and the conviction was widely condemned as an attack on peaceful and legitimate freedom of expression. In October 2006, the Society was closed down, under a provision in the NGO Law that makes it illegal for an organization to be headed by a person convicted of undefined "extremist" activities.<sup>11</sup>

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<sup>7</sup> International Center for Not-for-Profit Law, *ibid.*

<sup>8</sup> Kamhi, *ibid.*

<sup>9</sup> Charles Digges, September 9, 2007, "Bellona St. Petersburg under the gun of Russia's new NGO laws", at [http://www.bellona.org/articles/articles\\_2007/bellona\\_NGO](http://www.bellona.org/articles/articles_2007/bellona_NGO)

<sup>10</sup> Digges. *Ibid.*

<sup>11</sup> Amnesty International, October 13, 2006, "Russian Federation: Russian Chechen Friendship Society closed under new NGO law", at <http://www.amnesty.org/en/library/asset/EUR46/048/2006/en/dom-EUR460482006en.html>

### **Ethiopia: Draconian draft NGO Law threatens existence of civil society**

In Ethiopia, a draft NGO Law called the “Charities and Societies Proclamation” is currently before the parliament, and is likely to be passed in the near future. The law, which will regulate all domestic and international civil society organizations NGOs carrying out activities in the country, has been heavily criticized by numerous human rights and development agencies, as well as foreign governments including the United States.

Amongst other things, the law creates a state oversight agency which could at any moment launch an investigation into any organization, take part in internal meetings or instruct the police to do so, as well as appoint or dismiss senior staff.<sup>12</sup> Foreign and foreign-funded organizations are forbidden to work on a wide range of issues, including human rights, democracy building, gender, children’s rights, disabled rights, conflict resolution and the justice sector. Any violation of the law will be “punishable in accordance with the provisions of the criminal code”, while numerous administrative irregularities are criminalized – for example, failing to comply with a requirement that no more than 30 percent of an NGO’s budget be spent on administration. NGOs that do not meet these stringent conditions risk being suspended or closed down, while any staff members who participate in “criminal acts” such as failing to keep adequate accounting records face prison terms of between three and five years.<sup>13</sup>

According to Human Rights Watch, “the intended and actual result of this law would be to make it nearly impossible for any civil society organization to carry out work the government does not approve of. It also contravenes fundamental human rights guaranteed by international law and by Ethiopia’s constitution. Most notably, the law would criminalize human rights-related work carried out by non-Ethiopian organizations while at the same time making it impossible for domestic human rights organizations to operate with any real degree of effectiveness or independence.”<sup>14</sup>

Amnesty International has claimed that the bill violates the Ethiopian constitution and international and regional human rights treaties to which Ethiopia is a party, and that, if passed, it will "wreck" Ethiopian civil society.<sup>15</sup>

Concerns about the draft law expressed by the U.S. Department of State have been dismissed by the Ethiopian government, despite the fact that the U.S. provides some \$800m in annual aid to the country, primarily humanitarian food aid.<sup>16</sup> Despite the outcry provoked by the draft law, on October 17, 2008, it was sent by the Council of Ministers to the Parliament for approval, where it remains pending at time of writing.

<sup>12</sup> AFP, October 18, 2008, “Disputed NGO law sent to Ethiopian parliament: report”, at [http://afp.google.com/article/ALeqM5JayJFD5I2u\\_Sl3FITNczCjIGvNcA](http://afp.google.com/article/ALeqM5JayJFD5I2u_Sl3FITNczCjIGvNcA)

<sup>13</sup> Human Rights Watch, October 13, 2008, “Analysis of Ethiopia’s Draft Civil Society Law”, at <http://www.hrw.org/legacy/pub/2008/africa/HRW.NGO.Law.Analysis.pdf>

<sup>14</sup> Human Rights Watch, *ibid.*

<sup>15</sup> Amnesty International, October 14, 2008, “Ethiopia: Draft Law Would Wreck Civil Society”, at <http://www.amnestyusa.org/document.php?id=ENGAFR250092008&lang=e>

<sup>16</sup> Peter Heinlein, VOA News, October 21, 2007, “US Says Draft Ethiopian NGO Law Would 'Close Political Space'”, at <http://www.voanews.com/english/archive/2008-10/2008-10-21-voa68.cfm?CFID=73400617&CFTOKEN=21050934>

## Asia: Examples of NGO Laws and other civil society restrictions

### China<sup>17</sup>

In China, freedom of association is theoretically protected by law, as it is in Cambodia. But in reality in China the government has restricted this right considerably, particularly through regulations on civil society organizations. Government policy and regulations require all professional, social, and economic organizations to gain registration and approval from government. According to the US State Department, "in practice these regulations prevented the formation of truly autonomous political, human rights, religious, spiritual, labor, and other organizations that might challenge government authority".<sup>18</sup> In the past few years, this has been achieved partly by refusing registration or deregistering NGOs. The government also introduced a task force to oversee and interrogate NGOs, particularly those with foreign links, and those focused on social development or human rights.

### Thailand<sup>19</sup>

In Thailand, it is radio stations and media outlets that have had the same problems with new registration requirements as human rights NGOs have had elsewhere. Thai statutory law only allows government entities to use radio frequencies, but a state policy allowed community radio operators to operate 'extra-legally' until regulations were introduced. In 2004 the government began to require registration, warning that unregistered operators would be arrested. Following the new policy, the government closed 17 community radio stations, including one that was notably critical of the government. The police also informally requested media outlets to be cautious when reporting sensitive political or social issues. Even though this request had no legal standing, it may well have prompted self-censorship by the radio stations. The crackdown on community radio stations was accompanied by incidents of censorship of television programs, newspapers, and books that were critical of government or the monarchy. In February 2006, Sathien Chanthorn, a 56-year old farmer who ran a community radio station that was occasionally critical of government, received an 840 euro fine and a four-month suspended sentence for operating his station without a license.<sup>20</sup>

### Malaysia<sup>21</sup>

Malaysia also protects freedom of association in its constitution, but it is limited by several statutes. Societies must register if they are to function, and the government has manipulated this requirement for political purposes. Political opposition groups affiliated with the Communist or Socialist parties in Malaysia have been refused registration. The University and University Colleges Act also requires student associations to gain approval of their universities, and prohibits them from participating in political activities. A number of Universities also allowed government to monitor campus elections of student representatives.

<sup>17</sup> U.S. Department of State, Bureau of Democracy, Human Rights, and Labor, March 8, 2006, "Country Reports on Human Rights Practices, China, 2005", at [www.state.gov/g/drl/rls/hrrpt/2005/61605.htm](http://www.state.gov/g/drl/rls/hrrpt/2005/61605.htm)

<sup>18</sup> *Ibid.*

<sup>19</sup> U.S. Department of State, Bureau of Democracy, Human Rights, and Labor, March 8, 2006, "Country Reports on Human Rights Practices, Thailand, 2005", at <http://www.state.gov/g/drl/rls/hrrpt/2005/61628.htm>

<sup>20</sup> Reporters without Borders, February 8, 2006, "Farmer gets suspended sentence for operating community radio" at [www.rsf.org/article.php3?id\\_article=16399](http://www.rsf.org/article.php3?id_article=16399)

<sup>21</sup> U.S. Department of State, Bureau of Democracy, Human Rights, and Labor, March 8, 2006, "Country Reports on Human Rights Practices, Malaysia, 2005", at <http://www.state.gov/g/drl/rls/hrrpt/2005/61615.htm>

## **Asia: NGO Laws successfully blocked**

### **Nepal<sup>22</sup>**

In November 2005, the Government of Nepal introduced a Code of Conduct for Social Organizations, as part of its Social Welfare Act. The Code would be administered by a Council of government appointees, with the power to dissolve, or to suspend and take over the administration of organizations that contravene the Code. It also contained a number of provisions that violated Nepal's obligations under international human rights treaties, particularly the ICCPR. Among the most problematic provisions in the law were requirements that activities be in consonance with government plans, and that the government approve foreign funding to NGOs. The NGO Federation of Nepal, representing 2600 national NGOs, rejected the Code outright. The Association of International NGOs, representing 50 INGOs working in Nepal, expressed serious concerns on both procedural and substantive aspects of the law. The Special Representative of the UN Secretary-General on Human Rights Defenders also affirmed that the Code was in contradiction to the Declaration on Human Rights Defenders. Due to this reaction the Nepal Supreme Court was convinced to suspend the implementation of the Code, and finally in May 2006 the Nepalese Cabinet annulled the Ordinance introducing the Code, not long after the Nepalese Parliament had been restored and the King had capitulated in response to major protests.

### **Bangladesh<sup>23</sup>**

In 2004, the Bangladesh government proposed an amendment to its Foreign Donations Regulation Act. The changes would have barred NGOs from participating in "political activity", defined vaguely and broadly as including "any activity which may be interpreted as political, or may affect politics, or such other activities which may be interpreted to be detrimental to national independence, sovereignty, culture, ethnic and religious sentiment". The new Act would also have allowed the authorities to remove the Chief Executive of an organization if the government is satisfied that they have "been responsible for any irregularity in respect of its funds or for any mal-administration in the conduct of its affairs ... or has caused the organization to be involved in any political activity, or any activity influencing politics directly". Contraventions of the Act would also give the government power to dissolve an NGO and liquidate its assets. Under immense pressure from donors and NGOs, however, the government eventually withdrew the proposals.

### **India<sup>24</sup>**

In 2005, the government of India proposed a Foreign Contribution Management and Control Bill. Although an existing law already requires Ministry of Home Affairs approval of any foreign funding to Indian NGOs, the new bill has the potential to restrict NGO activities even further. The Bill would add a requirement for NGOs to seek re-registration every two years, which could be denied if the Registration Authority finds that the NGO has not "undertaken meaningful activity in its chosen field", a determination left up to the discretion of the authority. The bill would also prohibit foreign donations to "organizations of a political nature" - a term which is not defined in any greater detail, and could encompass human rights defenders and other government critics. A variety of human rights organizations - the South Asia Human Rights Documentation Centre in particular - spoke out against the constraints the bill will imply for their activities. A revised version of the Bill was put forward in late 2006, with some of the restrictions removed, but at time of writing has yet to be passed and appears to have been placed on indefinite hiatus.

<sup>22</sup> Information provided by Forum-Asia.

<sup>23</sup> See Pandey and Shruti, above.

<sup>24</sup> See Pooran Chandra Pandey and Ishita Shruti, 2005, "Laws to Regulate Foreign Contribution in Commonwealth Nations", VANI, New Delhi; and SHRDC, February 25, 2006, "Where not to be if you're a human rights defender", *Human Rights Features*, HRF 136/06, at <http://www.hrhc.net/sahrdc/hrfeatures/HRF136.htm>





# NGO Law: Concerns and Recommendations

June 2006



សម្ព័ន្ធនៃជំរឿននិងការការពារសិទ្ធិមនុស្ស លីកាដូ

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# Background

- The Cambodian government has decided to draft an NGO law by December, 2006
- The World Bank has agreed to help in the process





# Consultation Process

- Star Kampuchea has established a working group of NGOs to discuss the NGO law.





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# Advantages of an NGO law



# 1. Funding

- An NGO law could set out clear requirements for NGOs to obtain legal status. This would allow the government to give tax breaks to companies that make donations to NGOs.
- This way Cambodian NGOs could reduce their reliance on foreign funding



# Funding...

BUT...

- This would require changes to tax laws. An NGO law would not do this by itself.
- Creating incentives for companies to avoid taxes by making donations could encourage corruption in NGOs.



## 2. Cooperation

- Some NGOs which work regularly with government (health, development NGOs etc.) believe that an NGO law would require the government to cooperate better with NGOs.



# Cooperation...

BUT...

- An NGO law would certainly create new duties for NGOs to provide information to the government.
- But it would not necessarily require government to cooperate better with NGOs.





# 3. Constitution

- Some lawyers say the Constitution of Cambodia requires an NGO law
  - Article 42 of the Constitution says the right to association will be ‘determined by law’.



# Constitution...

BUT...

- NGOs currently register with relevant government institutions and are accountable to the government and to the public. It is therefore not urgent that the system be reformed.



# Disadvantages of an NGO law

Based on latest draft NGO law  
available: May 2005



# 1. Registration

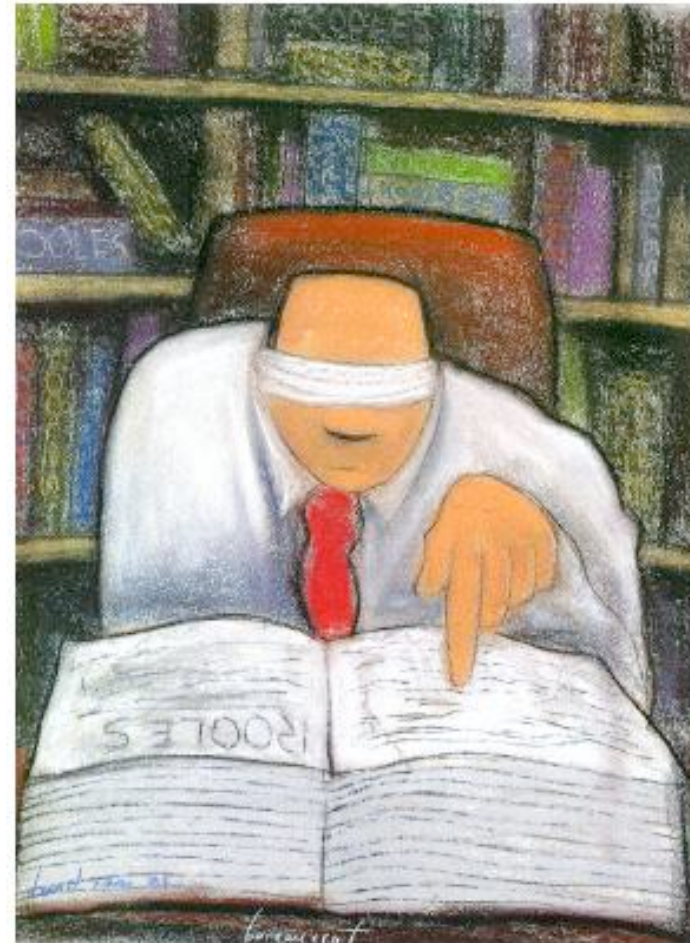
- Cambodian NGOs would have to register or re-register with the Ministry of Interior





# Registration...

- The registration institution would not be independent from government





# Registration...

- The process could be long, complicated, and costly, and government institutions could delay or refuse registration for minor technical problems





## 2. “Politics”

- Cambodian NGOs would be prohibited from “conducting activities for political interests”





# “Politics” ...

- But it is not clear what ‘political interests’ means – the government could accuse NGOs of conducting ‘political’ work, and suspend or dissolve the NGO







# “Politics” ...

- Cambodian NGOs that keep working after they have been suspended or dissolved could face large fines, or their staff could go to prison





# 3. Notification of Authorities

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- Cambodian NGOs would have to notify local authorities about their “project plans”, but it is unclear exactly what information is required



## 4. Judiciary

- Because the judiciary in Cambodia is weak and laws are not always enforced, *any* provision in an NGO law could be harmful to NGOs – even ‘reasonable’ and clearly drafted provisions.



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# INTERNATIONAL LESSONS



# International Lessons...

- In many countries around the world, governments have used NGO laws to restrict civil society organizations' work or even ban NGOs.



# International Lessons...





# International Lessons...

- In China and Thailand, the governments have used registration rules to limit legitimate criticism of government by NGOs or media



# International Lessons...

- In Nepal and Bangladesh, NGOs joined with international donors, and succeeded in stopping restrictive NGO laws that had been proposed by the government





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# ALTERNATIVES



# Alternatives...

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1. The Cambodian government should pass 8 key laws to ensure judicial independence and integrity **before** an NGO law is drafted



# Alternatives...

2. An independent certification institution could be established to monitor NGO activities and finances, and provide information to donors.
  - This organization would be independent from government



# INITIATIVES



# Initiatives...

- Louise Arbour, the UN High Commissioner for Human Rights:
  - communicated to the Cambodian government that NGOs should be “safeguarded and supported”
  - and that judicial reform should be the top priority in terms of building democracy and the rule of law in Cambodia



# Initiatives...

- Cambodian Human Rights Action Committee (CHRAC):
  - CHRAC's 21 members met to discuss concerns about the NGO Law
  - CHRAC steering committee met with the Star Kampuchea working group to express concerns
  - Chair of CHRAC met with World Bank



# Initiatives...

- LICADHO
  - Shared concerns and recommendations with international NGOs, U.N. agencies, Cambodian NGOs
  - Is meeting with key coalitions to discuss concerns and recommendations
  - Is researching the experience of other countries in the region with NGO laws



# Initiatives...

- International allies  
(Human Rights Watch, Amnesty International, Forum-Asia, Federation Internationale and other experts)
  - Provided resource information and research documents
  - Offered to join in lobbying efforts on the NGO law at the bilateral and multilateral levels



