



Human Rights Council
Working Group on the Universal Periodic Review
Forty-sixth session
29 April–10 May 2024

Summary of stakeholders' submissions on Cambodia*

Report of the Office of the United Nations High Commissioner for Human Rights**

I. Background

1. The present report was prepared pursuant to Human Rights Council resolutions 5/1 and 16/21, taking into consideration the periodicity of the universal periodic review and the outcome of the previous review.¹ It is a summary of 38 stakeholders' submissions² for the universal periodic review, presented in a summarized manner owing to word-limit constraints.

II. Information provided by stakeholders

A. Scope of international obligations³ and cooperation with human rights mechanisms

2. The Human Rights Foundation (HRF) called on Cambodia to commit to ratifying critical international human rights instruments, including, but not limited to ICCPR-OP1, ICCPR-OP2, and the OP-ICESCR.⁴

3. China Labor Watch (CLW) recommended that Cambodia ratify the ICRMW.⁵

4. Several submissions recommended that Cambodia ratify the International Labour Organization (ILO) Migration for Employment Convention, 1949 (No. 97), the ILO Migrant Workers Convention, 1975 (No. 143), the ILO Indigenous and Tribal Peoples Convention, 1989 (No. 169), and the ILO Violence and Harassment Convention, 2019 (No. 190).⁶

5. JS21 recommended that Cambodia ratify, by 2026, the 1954 Convention relating to the Status of Stateless Persons and the 1961 Convention on the Reduction of Statelessness.⁷

6. JS15 recommended that Cambodia extend a standing invitation to all United Nations special procedure mandate holders.⁸

* The present document is being issued without formal editing.

** Agreement was reached to publish the present report after the standard publication date owing to circumstances beyond the submitter's control.



B. National human rights framework

1. Constitutional and legislative framework

7. Asia Centre (AC) recommended that Cambodia ensure that laws enacted during states of emergency were in line with article 4 of the ICCPR on the derogation of rights, and that following the emergency period, it assessed the necessity of those laws in the long term and engaged in public consultations to evaluate their impact.⁹

2. Institutional infrastructure and policy measures

8. JS23 stated that corruption in Cambodia continued to exist on the grand as well as petty scales. It recommended that Cambodia strengthen the independence and accountability of the Anti-Corruption Unit and establish the whistle-blower regime with provisions to provide for adequate protection for whistle-blowers, in line with international best practice.¹⁰

9. CLW recommended that Cambodia establish an independent complaints mechanism with the authority to investigate all reported allegations of and complaints about acts of torture and ill-treatment.¹¹

C. Promotion and protection of human rights

1. Implementation of international human rights obligations, taking into account applicable international humanitarian law

Equality and non-discrimination

10. JS21 stated that many long-term ethnic Vietnamese residents and Khmer Krom continued to live at the margins of society and faced difficulties substantiating their legal status.¹²

Right to life, liberty and security of person, and freedom from torture

11. JS3 recommended that Cambodia ensure that the use of force at assemblies was exceptional and strictly complied with principles of legality, precaution, necessity, proportionality and accountability, and provide comprehensive and periodic training to security forces charged with policing assemblies.¹³

12. The International Commission of Jurists (ICJ) stated that the police may arrest and detain accused persons for a maximum of 24 hours before granting them access to legal counsel, during which time they may be interrogated by the police. That deprived them of the right to legal representation during the first 24 hours of their detention, which was an important safeguard against torture and other ill-treatment in custody.¹⁴

13. JS15 stated that scores of human rights defenders had been harassed, detained, or convicted under vaguely worded charges of “incitement to commit a felony” under articles 494 and 495 of the Criminal Code. Highly politicised courts meant that those arbitrarily detained and charged were often held for prolonged periods in pretrial detention and had no chance of getting a fair trial.¹⁵

14. HRF called on Cambodia to immediately and unconditionally release all prisoners of conscience and end systematic violations of due process, including arbitrary arrests and detentions and deprivation of legal counsel.¹⁶

15. JS22 stated that the use of pre-trial detention remained excessive. The high number of pre-trial detainees contributed to overcrowding and other cruel, inhuman, or degrading treatment in Cambodia’s prisons.¹⁷

16. Amnesty International (AI) stated that the Government’s campaign against drugs had skyrocketed the prison population. Thousands more were held arbitrarily every year in drug detention centres, which lacked medical facilities and properly trained staff. Detainees faced systematic abuse.¹⁸

17. JS24 recommended that Cambodia bring conditions of detention into compliance with the Nelson Mandela Rules, particularly with respect to air-quality standards, access to water, and access to electricity.¹⁹

18. JS6 recommended that Cambodia address prison overcrowding by promoting the greater use of alternatives to pre-trial detention.²⁰

19. JS22 recommended that Cambodia allow for periodic, unannounced, and unimpeded external inspections of prisons by independent international organizations.²¹

20. End Corporal Punishment (ECP) recommended that Cambodia intensify its efforts to adopt the draft Law on Child Protection to clearly prohibit all corporal punishment of children, however light, in every setting of their lives, as a matter of urgency.²²

Administration of justice, including impunity, and the rule of law

21. AI recommended that Cambodia increase efforts to thoroughly, independently and impartially investigate the enforced disappearance of individuals and determine their fate and whereabouts.²³

22. JS3 recommended that Cambodia strengthen existing police and military oversight mechanisms to ensure that security personnel and officials responsible for instances of excessive use of force against peaceful assemblies were held accountable.²⁴

23. JS24 recommended that Cambodia thoroughly and impartially investigate and prosecute crimes committed against representatives of civil society organizations and human rights defenders, as well as opposition members and journalists, and hold offenders accountable.²⁵

24. JS6 stated that the judiciary was routinely used to suppress political opposition or detain activists, union members or citizens making politically sensitive comments through arbitrary charges of incitement. It was also damaged by corruption.²⁶

25. JS23 stated that the judiciary was publicly perceived as one of the most corrupt public institutions in Cambodia even if the independence of the judiciary was guaranteed by the constitution and statute.²⁷

26. ICJ recommended that Cambodia safeguard, in law and in practice, the full independence and impartiality of judges and prosecutors from any form of political pressure and undue influence, including by amending the Law on the Organization of the Courts, the Law on the Statute of Judges and Prosecutors, and the Law on the Organization and Functioning of the Supreme Council of the Magistracy, with the aim to eliminating executive influence on the administration and functioning of the judiciary.²⁸

27. ICJ stated that numerous violations of fair trial rights had been reported, including of the right to a public hearing, the right to defend themselves, the right to equality of arms, the presumption of innocence, and the right to a public and reasoned judgment, particularly in cases involving human rights defenders and perceived political opponents.²⁹

28. JS6 recommended that Cambodia amend article 301 of Code of Criminal Procedure to ensure that all people had access to a lawyer, including in misdemeanour cases.³⁰

29. JS18 recommended that Cambodia take measures to end the arbitrary and lengthy detention of journalists, ensure that the right to a fair trial was respected, and allow journalists and human rights defenders the right to legal counsel at all stages of their detention and trial.³¹

30. JS6 recommended that Cambodia continue to develop and strengthen processes that eliminated the excessive use of pre-trial detention of children in conflict with the law, in line with international standards on child rights and the Law on Juvenile Justice.³²

31. JS6 recommended that Cambodia take the necessary steps to protect the privacy of children in conflict with the law during criminal proceedings.³³

Fundamental freedoms and the right to participate in public and political life

32. JS17 stated that freedom of expression in Cambodia had deteriorated since the last UPR. Major issues of concern included criminal sentences and arrests of those who exercised

their right to freedom of expression, attacks on the independent media including the closure of media outlets and acts of intimidation and harassment against the media.³⁴

33. ICJ stated that Cambodia had continued using laws that were not human rights compliant to convict human rights defenders, journalists and perceived political opponents on spurious criminal charges, often as a result of criminal proceedings reportedly marred with violations of the right to a fair trial.³⁵

34. Human Rights Watch (HRW) stated that Cambodia had used threats, violence, and repressive laws against community leaders, nongovernmental organizations, and activists who sought to expose human right abuses, corruption, and government overreach.³⁶

35. JS12 stated that most human rights defenders in Cambodia were routinely subjected to judicial harassment including summons, questioning, criminal charges, arrests, detention, and convictions. Criminal offenses such as incitement, plotting, and insulting the King (*lèse majesté*) were commonly used to target human rights defenders.³⁷

36. JS9 recommended that Cambodia cease the judicial harassment, including arbitrary detention, of human rights defenders, particularly environmental activists.³⁸

37. JS17 recommended that Cambodia end impunity by promptly investigating, prosecuting and redressing cases of violence against journalists, human rights defenders, political campaigners and others who were attacked for exercising their right to freedom of expression.³⁹

38. JS12 recommended that Cambodia ensure a free civic space, allowing human rights defenders, political opposition leaders, and journalists to carry out their activities without obstruction, without fear or harassment, or reprisals.⁴⁰

39. JS15 recommended that Cambodia conduct impartial, thorough and effective investigations into all cases of enforced disappearances, attacks, harassment and intimidation against civil society members, human rights defenders and journalists and bring the perpetrators of such offences to justice.⁴¹

40. JS3 recommended that Cambodia repeal or amend the articles of the Criminal Code on defamation, threats to cause damage, obstruction of public official and incitement to bring them into line with article 19 of the ICCPR to and prevent them from being used to arbitrarily restrict fundamental freedoms.⁴²

41. JS12 recommended that Cambodia repeal the provisions of the Criminal code that could be used to restrict freedom of expression, including criminal offenses such as *lèse majesté*, incitement, public defamation, and public insult.⁴³

42. The Asian Network for Free Elections (ANFREL) stated that media freedom and access to information in Cambodia had witnessed a significant decline. Independent media outlets had faced restrictions and journalists had encountered harassment, while state-controlled media entities had come to dominate the information landscape.⁴⁴

43. JS9 stated that journalists and media workers continued to be harassed both judicially and extra-judicially, including through violent attacks, imprisonment, legal action, discrimination, and online harassment.⁴⁵

44. ANFREL stated that the revocation of media licenses was often done based on accusations of spreading false information and inciting societal chaos.⁴⁶

45. HRW stated that Cambodia had threatened and shut down independent media outlets while a number of opposition political party leaders and supporters, civil society activists, and journalists had fled the country or remained in exile in fear of arbitrary arrest.⁴⁷

46. JS12 stated that after the closure of Voice of Democracy and the subsequent decision to block its website, other websites had had their licenses revoked and their staff had been arrested for allegedly publishing fake news or discrediting the Government.⁴⁸

47. HRW recommended that Cambodia cease the arbitrary interference, blocks, and surveillance of online and offline media and the use of repressive laws to censor and control the media.⁴⁹

48. JS9 recommended that Cambodia reinstate the media licences of independent news outlets, including the Voice of Democracy.⁵⁰
49. HRW recommended that Cambodia cease the intimidation, surveillance, and harassment of independent media outlets, journalists, and government critics, and investigate and appropriately prosecute those who were responsible for attacks against them.⁵¹
50. JS12 recommended that Cambodia establish an independent broadcasting authority, setting clear rules for allocating and revoking broadcasting licenses, in line with international human rights standards.⁵²
51. JS4 recommended that Cambodia establish a whistle-blower protection regime by enacting a whistle-blower protection law.⁵³
52. JS15 recommended that Cambodia review the Law on Associations and Non-Governmental Organizations to guarantee that undue restrictions on freedom of association were removed and the Act was brought into compliance with articles 21 and 22 of the ICCPR.⁵⁴
53. JS15 stated that civil society had documented the arbitrary denial of permission to hold peaceful assemblies and arrests of organisers based on vague legal provisions contained in the Law on Peaceful Demonstrations. Authorities had also used excessive and disproportionate force to disperse peaceful demonstrations, leading to widespread arrests and detention of protesters, including human rights defenders, environmental activists, opposition leaders and trade unionists.⁵⁵
54. JS1 recommended that Cambodia ensure that all restrictions and bans on protests, assemblies and demonstrations were strictly necessary and compliant with international human rights standards.⁵⁶
55. JS15 recommended that Cambodia amend the Law on Peaceful Demonstrations to guarantee fully the right to freedom of peaceful assembly as provided for in international law and standards.⁵⁷
56. JS9 recommended that Cambodia promote a safe and enabling environment for individuals and groups to exercise their rights to freedom of peaceful assembly and refrain from the excessive use of force against protestors, including in the context of ongoing strikes by the Labour Rights Supported Union.⁵⁸
57. HRW stated that at the prompting of the government and the ruling Cambodian People's Party, the National Election Committee had barred the main opposition party, the Candlelight Party, from contesting the July 2023 election, effectively making the election a meaningless exercise.⁵⁹
58. JS17 stated that treason charges were commonly used against political opponents, including mass trials of persons connected with the political opposition in 2020–2022, when numerous persons had been convicted of treason and incitement to commit a felony.⁶⁰
59. ANFREL called on Cambodia to cease the crackdown on opposition voices and take the necessary actions to ensure genuine multi-party elections.⁶¹
60. HRW recommended that Cambodia cease politically motivated harassment and prosecution of opposition members and supporters, including those from the Cambodia National Rescue Party and the Candlelight Party.⁶²
61. HRW recommended that Cambodia immediately and unconditionally release all political opposition and civil society activists imprisoned for peacefully exercising their human rights.⁶³

Right to privacy

62. JS17 stated that monitoring of internet content and social media posts, accompanied by website blocks and legal action against content that authorities disapproved of, had increased in recent years.⁶⁴
63. ICJ stated that the Sub-Decree on the Establishment of the National Internet Gateway required all internet traffic to be routed through a regulatory body charged with monitoring

online activity before it reached users. It posed risks to the exercise of the rights to freedom of expression and privacy, containing provisions endowing overbroad powers on government-appointed operators to block or disconnect online connections, retain traffic data and provide network information requested by the authorities, and issue overbroad penalties for non-compliant telecommunications operators.⁶⁵

64. JS12 stated that Cambodia lacked strong data protection rules that would clearly constrain the Government's ability to access private data.⁶⁶

65. JS17 recommended that Cambodia place clear limits on the power of authorities to engage in surveillance and to block Internet sites without a court order and revise the Telecommunications Law to align with international standards.⁶⁷

66. HRF called on Cambodia to revoke the Sub-Decree on the Establishment of the National Internet Gateway.⁶⁸

67. JS4 urged Cambodia to adopt an Access to Information Law in line with international standards and establish an access to information oversight system.⁶⁹

Prohibition of all forms of slavery, including trafficking in persons

68. JS13 stated that slavery-like labour practices, including forced labour and human trafficking for the purpose of sexual and labour exploitation, continued to be reported, particularly in certain Special Economic Zones.⁷⁰

69. AI stated that during the COVID-19 pandemic, criminal organizations had begun trafficking persons from various countries into Cambodia, forcing them into fortified compounds to run online scams and gambling operations under the threat of violence and confiscating their passports. It stated that several investigative news reports tied Government officials and their families to the compounds. AI stated that a significant number of trafficking survivors who were removed from the compounds by the authorities, were detained in state-run centres for months, placed in overcrowded rooms, asked to pay for their own food and water, all without any access to legal counsel.⁷¹

70. JS16 stated that child labour, including the worst forms of child labour, continued to be a serious issue. Forced labour of children remained present in multiple sectors, including in unsafe and precarious industries like brick kilns, rubber plantations and agriculture, factories and in the informal sector.⁷²

71. JS16 recommended that Cambodia explicitly prohibit the employment of children in harmful or hazardous work and develop a list of hazardous work prohibited for children, and significantly increase the human, technical and financial resources allocated to labour inspections in all sectors in order to effectively implement the laws and policies on child labour, prosecute any perpetrators of violations relating to child labour and increase sanctions. It also recommended that Cambodia support children who had experienced the worst forms of child labour and contemporary forms of slavery to fully access their rights.⁷³

72. CLW recommended that Cambodia better coordinate its efforts to combat trafficking in persons, especially through the National Committee for Counter Trafficking and the Anti-Human Trafficking and Juvenile Protection Police, by systematically and vigorously investigating and prosecuting perpetrators. It recommended that Cambodia guarantee adequate protection, reparation, and compensation to victims, including rehabilitation.⁷⁴

Right to work and to just and favourable conditions of work

73. JS26 stated that the independent trade union movement in Cambodia was being specifically and systematically targeted via administrative requirements, judicial obstruction and harassment and criminalization.⁷⁵

74. HRW recommended that Cambodia amend the Law on Trade Unions in consultation with workers, labour advocates, and other stakeholders, to bring it into full compliance with International Labour Organization Conventions No. 87 (Freedom of Association) and No. 98 (Right to Organize and Collectively Bargain).⁷⁶

75. HRW recommended that Cambodia cease the harassment, arbitrary arrests, and attacks on trade unionists and workers, and investigate and appropriately prosecute the perpetrators of such attacks.⁷⁷

76. JS12 recommended that Cambodia drop all charges against trade union activists for their involvement in union activities and unconditionally release all the leaders from the Labour Rights Supported Union of Khmer Employees of NagaWorld.⁷⁸

77. JS13 recommended that Cambodia ensure that the minimum wage was applied to all sectors of the labour market and that all workers received a minimum wage that enabled them to enjoy a decent standard of living for themselves and their families.⁷⁹

78. JS13 recommended that Cambodia ensure that legislation protecting labour rights was effectively applied to all sectors and all workers, including by addressing the practice of engaging in short-term employment contracts as a means of bypassing various social protection laws or restricting union activities by employers.⁸⁰

79. JS26 recommended that Cambodia ensure legal protections against gender-based violence at work through the inclusion in the Labour Law of a definition of sexual harassment and gender-based violence.⁸¹

Right to social security

80. JS16 recommended that Cambodia expand social protection coverage, deliver safety nets, and provide other support to families with children in vulnerable situations, and in particular support foster parents and kinship caregivers at risk of poverty and exploitation by linking them with social protection support services.⁸²

81. The Cambodian Disabled People's Organization (CDPO) recommended that Cambodia ensure that all persons with disabilities, including those working in the informal sector, had access to the National Social Security Fund.⁸³

Right to an adequate standard of living

82. JS3 stated that there had been a dramatic increase in land disputes, with the number of people forcibly evicted or displaced rising every year despite existing legal protections and a titling drive.⁸⁴

83. JS22 stated that, since 2019, at least 22,021 families had been impacted by rampant land grabbing, and tens of thousands of others continued to lack remedy from decade-old disputes. In recent years, Cambodia had reclassified large swaths of state land in order to hand them over to well-connected elites.⁸⁵

84. JS22 stated that violence perpetrated by armed forces, arbitrary detention, and criminal prosecution had been routinely used to evict and silence communities, without adequate compensation or resettlement areas.⁸⁶

85. AI recommended that Cambodia adopt measures to prevent unlawful evictions and use mechanisms based on accountability and transparency to settle land disputes in an equitable and expeditious fashion, as urged by the Human Rights Council in its resolution 36/32.⁸⁷

86. JS3 recommended that Cambodia ensure that future evictions complied with relevant international human rights law and standards, and that: (1) evicted families were provided with adequate compensation based on the market value of the land they used to occupy, and resettled in areas that offered easy access to basic services and livelihood opportunities; (2) evictions were only used as an absolute last resort; and (3) evictions were never carried out using excessive or disproportionate force.⁸⁸

Right to health

87. JS16 stated that access to affordable and quality health care remained far from being universally accessible, especially for the near-poor and groups in vulnerable situations living on the margin of poverty. Health expenditures could push many households back into poverty and forced families to take on unmanageable debt burdens.⁸⁹

88. JS16 recommended that Cambodia prioritize measures to improve access to free, quality health services, in particular in rural areas and for children with disabilities, children belonging to minority groups and migrant children, including by expanding access to the Health Equity Fund.⁹⁰

89. JS8 stated that child undernutrition, including stunting, wasting, underweight, and micronutrient deficiencies, was high in Cambodia despite years of economic growth.⁹¹

90. JS25 recommended that Cambodia ensure that all sex workers were able to access health services and address stigma and discrimination in healthcare services.⁹²

Right to education

91. Broken Chalk (BC) stated that while progress was tangible, children in Cambodia were still failing to reach learning standards appropriate for their age. By the time they were 17 years old, 55% of adolescents would have dropped out of school.⁹³

92. JS8 stated that education-related costs such as transportation, uniforms, shoes, books, supplies, and unofficial fees required by teachers created a financial burden that weighed heaviest on the poorest families. Some families took out loans to cover education costs for their children or removed their children from school in an effort to cut expenses and make existing loan repayments.⁹⁴

93. BC stated that there was increasing evidence that insufficient sanitation, water, and handwashing facilities in schools in Cambodia posed a barrier to children attending school and performing well, particularly affecting girls, and making it more challenging for them to manage menstrual care while at school. Children with disabilities found it particularly difficult to go to school if there were no accessible or adequate bathrooms.⁹⁵

94. BC stated that girls were affected by harmful social norms. After their education, they might be pressured to work in factories or rice fields to provide immediate income for their families.⁹⁶

95. JS16 recommended that Cambodia improve the quality of education at all levels, especially in rural areas, including by reducing the student-teacher ratio, ensuring appropriate levels of training for teachers and equipping schools with adequate and inclusive educational infrastructure, resources, technology, and sanitation.⁹⁷

96. JS16 recommended that Cambodia ensure that primary education was compulsory, and that free education was provided for all children for at least nine years and take active steps to guarantee that for children in the public education system, financial costs, including voluntary contributions, did not present obstacles for children to access education on an equal basis with their peers.⁹⁸

97. BC recommended that Cambodia focus on equitable and inclusive access to education for children with disabilities, children from ethnic minorities and children living in rural and urban poor areas.⁹⁹

98. CDPO recommended that Cambodia support the enrolment of children with disabilities at primary schools utilizing integrated and inclusion approaches.¹⁰⁰

99. JS21 recommended that Cambodia provide universal and non-discriminatory access to public education for all children regardless of whether they had sufficient proof of identity, including Vietnamese, in furtherance of the Education for All goals.¹⁰¹

Cultural rights

100. JS27 recommended that Cambodia strengthen the promotion of indigenous cultural traditions and create programs to preserve the sustainable practices and culture of Indigenous Peoples.¹⁰²

Development, the environment, and business and human rights

101. JS3 stated that land rights activists had been caught up in the widespread crackdown on fundamental freedoms launched by Cambodia in 2017. Many had been harassed or otherwise targeted.¹⁰³

102. JS9 stated that Cambodia had instigated a campaign of judicial harassment against environmental human rights defenders who spoke out against land grabs and environmental degradation.¹⁰⁴

103. JS13 recommended that Cambodia ensure that business entities operating in or domiciled in Cambodia systematically conducted consultations and carried out human rights due diligence, including independent environmental impact assessments, to prevent and/or mitigate the risks of negative impacts of their operations on the exercise of human rights.¹⁰⁵

2. Rights of specific persons or groups

Women

104. JS20 stated that gender-based violence in all of its forms continued to be prevalent in Cambodia. Many women survivors of domestic abuse continued to receive limited practical protection. Victim-blaming was pervasive. Some women seeking judicial remedies were stymied by lack of access and affordability of courts, as well as unwillingness by police to fully investigate violence, by prosecutors to initiate charges, and by courts to convict perpetrators and sentence them to appropriate remedies.¹⁰⁶

105. JS20 recommended that Cambodia ensure that protection orders and administrative decisions were effectively enforced and easily obtained in practice by all survivors of gender-based violence, including ethnic minorities, Indigenous Peoples, LGBTIQ+ individuals, persons with disabilities, sex workers, and other marginalized groups and those at risk of exclusion.¹⁰⁷

106. JS20 recommended that Cambodia ensure that all State actors at the local level were effectively equipped with legal, gender-based violence, and other necessary knowledge and skills to consistently be able to apply a survivor-centred, rights-based, and gender-responsive approach in their service delivery.¹⁰⁸

107. JS11 stated that women's political participation still encountered many challenges, ranging from getting opportunities to stand as candidates, to participating in the electoral process, and to advancing their political life as elected women.¹⁰⁹

108. JS14 recommended that Cambodia establish a budget line for a gender-responsive budget for every line ministry/agency to be funded from the national budget.¹¹⁰

109. JS16 recommended that Cambodia improve the quality and efficacy of awareness raising activities aimed at eliminating gender stereotypes and discrimination against girls and women.¹¹¹

Children

110. The European Centre for Law and Justice (ECLJ) stated that in Cambodia, nineteen percent of girls were married before the age of eighteen, while two percent were married before the age of fifteen. Child marriage was most prevalent in rural areas such as Ratana Kiri or Mondul Kiri, where thirty-six percent of girls were married before eighteen.¹¹²

111. JS16 stated that child marriage in Cambodia was largely due to the persistence of harmful gender norms, lack of girl empowerment and lack of sexual education. There was a concerning ad hoc tolerance for underage marriages at the local level, notably in indigenous communities, which was reinforced by socio-economic inequalities and lack of access to education.¹¹³

112. JS16 stated that cases of sexual exploitation and suspected trafficking of children in residential care facilities had continued to be reported.¹¹⁴

113. JS16 recommended that Cambodia phase out institutionalization, support and prioritize family-based care for children wherever possible, including for children with disabilities, and strengthen the foster care system for children who could not stay with their families including by implementing the National Action Plan on Improving Alternative Care for Children 2023–2027.¹¹⁵

Persons with disabilities

114. CDPO recommended that Cambodia ensure that all current health staff were trained in the area of disability and that disability was included in the training curriculum for all new health staff within 4 years.¹¹⁶

115. CDPO recommended that Cambodia develop and adopt national justice system guidelines to ensure equitable services for persons with disabilities, inclusive of all types of disability, in 2 years.¹¹⁷

116. JS16 stated that most children with disabilities, especially in rural areas and especially those with intellectual disabilities, were either never enrolled in school, or dropped out prior to completion of lower secondary.¹¹⁸

Indigenous Peoples

117. JS3 stated that despite the existence of legal mechanisms to formalize their customary land rights, indigenous communities were particularly vulnerable to losing the land that sustained them and were often subject to forced evictions or blocked from accessing their traditional lands.¹¹⁹

118. AI stated that Cambodia routinely used repressive tactics to intimidate and threaten Indigenous environmental defenders, including death threats.¹²⁰

119. JS3 recommended that Cambodia amend the 2023 Environment and Natural Resources Code to include the term “indigenous communities” and reaffirm their exclusive ownership of indigenous customary lands and natural resources therein.¹²¹

120. JS3 recommended that Cambodia establish mechanisms to ensure that local and indigenous communities were systematically consulted and able to give their prior, free, and informed consent to the creation, extension and/or privatization of protected conservation areas or issuing of land concessions and step up efforts to issue them with formal land titles.¹²²

121. JS27 recommended that Cambodia develop protective measures to ensure Indigenous Peoples’ lands were free from illegal encroachment while in the process of collective land registration.¹²³

122. JS27 stated that Indigenous Peoples continued to struggle with a lack of schools, remoteness, and a lack of accommodation, support, study materials, teachers and scholarships.¹²⁴

123. JS27 recommended that Cambodia provide direct support to Indigenous Peoples in accessing formal quality education from early childhood to university, through ensuring accessibility of schools, scholarships, and expansion of multi-lingual education.¹²⁵

Lesbian, gay, bisexual, transgender and intersex persons

124. JS10 stated that LGBT+ persons in Cambodia continued to face various forms of legal and social discrimination, in large part due to: (1) the current exclusion of same-sex couples from being able to legally marry under the law, (2) the current lack of legal recognition of self-defined gender identity for transgender and gender-diverse persons, and (3) persisting lived experiences of discrimination based on SOGIESC and obstacles to social inclusion in the family, education, employment and health sectors with remaining gaps in legal and policy protections against discrimination based on SOGIESC.¹²⁶

125. JS16 noted that children with diverse sexual orientation, gender identity and expression, and sex characteristics were subjected to stigma, bullying, discrimination, physical and psychological violence. Specialized counselling services to support the psychosocial wellbeing and mental health needs of such children were limited in availability and accessibility.¹²⁷

126. JS10 recommended that Cambodia continue progress towards enacting legal amendments to recognize legal marriage equality for same-sex couples with a view to guaranteeing non-discrimination, full equality and social inclusion of LGBT+ persons in Cambodia.¹²⁸

Stateless persons

127. JS21 stated that many of Cambodia's Vietnamese communities were stateless or at risk of statelessness, having neither Cambodian nor Vietnamese nationality. They did not have access to many basic economic, social and political rights and faced an array of disadvantages, including limited freedom of movement, being unable to own land, and difficulty accessing formal employment, education, health care and legal protection.¹²⁹

128. JS2 stated that the Khmer Krom faced challenges in obtaining Cambodian identity cards, which were very important to receive health care, education, land ownership, employment, passports, and the right to vote. It was also not uncommon for local authorities to require the Khmer Krom to pay money to obtain legal documents or to require the Khmer Krom to change their original name and place of birth to obtain an identity card.¹³⁰

129. JS21 stated that without national ID cards, as many as 30 percent of Khmer Krom in Cambodia struggled to get full access to healthcare, education, land ownership, employment, passports, finance and other benefits available to ordinary citizens such as the ability to vote.¹³¹

130. JS21 recommended that Cambodia strengthen efforts to achieve birth registration for all children, including Khmer Krom and Vietnamese children.¹³²

131. JS21 recommended that Cambodia take measures to ensure that children born in Cambodia who would otherwise be stateless had the ability to acquire nationality and had access to identity documents.¹³³

Notes

¹ A/HRC/41/17, A/HRC/41/17/Add.1, and A/HRC/41/2.

² The stakeholders listed below have contributed information for this summary; the full texts of all original submissions are available at: www.ohchr.org (one asterisk denotes a national human rights institution with A status).

*Civil society**Individual submissions:*

AC	Asia Center, Bangkok (Thailand);
AI	Amnesty International, London (United Kingdom);
ANFREL	The Asian Network for Free Elections, Bangkok (Thailand);
BC	Broken Chalk, Amsterdam (the Netherlands);
CDPO	The Cambodian Disabled People's Organization, Phnom Penh (Cambodia);
CLW	China Labor Watch, New York (United States of America);
ECLJ	The European Centre for Law and Justice, Strasbourg (France);
ECP	End Corporal Punishment, Geneva (Switzerland);
HRF	The Human Rights Foundation, New York (United States of America);
HRW	Human Rights Watch, Geneva (Switzerland);
ICJ	The International Commission of Jurists, Geneva (Switzerland).

Joint submissions:

JS1	Joint submission 1 submitted by: Cambodian Human Rights and Development Association (ADHOC); Committee for Free and Fair Elections in Cambodia (COMFREL);
JS2	Joint submission 2 submitted by: Khmer Kampuchea Krom for Human Rights and Development Association (KKKHRDA); Alliance for Conflict Transformation (ACT); Cambodian Center for Human Rights (CCHR); Khmer Kampuchea Krom Community (KKKC); Friendship for Khmer Kampuchea Krom Association (FKKKA); Khmer Kampuchea Krom Cultural Center in Cambodia (KKKCCC); Khmer Fund for the Poor (KFP); Khmer Kampuchea Krom Women Association (KKKWA); Khmer Krom Youth Council (KKYC);

- JS3 **Joint submission 3 submitted by:** Cambodian Center for Human Rights (CCHR); Cambodian Center for Humanity and Self Reliance (CCHSR); Children and Women Development Center in Cambodia (CWDC); Cambodia Indigenous People Organization (CIPO); Cambodia Indigenous Youth Association (CIYA); Cambodian Indigenous Women Association (CIWA); Cambodian Human Rights Action Coalition (CHRAC); Community Legal Education Center (CLEC); Community Translation Organization (CTO); Partnership for Development in Kampuchea (PADEK); PONLOK KHMER; Samakum Teang Tnaut Organization (STT);
- JS4 **Joint submission 4 submitted by:** Advocacy and Policy Institute (API); Cambodian Human Rights and Development Association (ADHOC); Alliance for Conflict Transformation (ACT); The Cambodian Center for Human Rights (CCHR); Cooperation Committee for Cambodia (CCC); Cambodian Disabilities People Organization (CDPO); Cambodia Center for Independent Media (CCIM); Community Legal Education Center (CLEC); Cambodian Journalists Alliance Association (CamboJA); Coalition for Partnership in Democratic Development (CPDD); Cambodian Human Rights Action Committee (CHRAC); Committee for Free and Fair Elections in Cambodia (COMFREL); NGO Forum on Cambodia (NGOF); Star Kampuchea (SK); Transparency International Cambodia (TIC); Village Support Group (VSG); Youth Council of Cambodia (YCC); Youth Resource Development Program;
- JS5 **Joint submission 5 submitted by:** The Committee for Free and Fair Elections in Cambodia (COMFREL); Cambodia Human Rights and Development Association (ADHOC); Cambodian Center for Human Rights (CCHR); Cambodian Center for Independent Media (CCIM); Center for Alliance of Labor and Human Rights (CENTRAL); Coalition for Integrity and Social Accountability (CISA); Cambodian Youth Network (CYN); People Center for Development and Peace (PDP-Center); Youth Resource Development Program (YRDP); Cambodian Human Rights Action Coalition (CHRAC); Neutral and Impartial Committee for Free and Fair Election in Cambodia (NICFEC); The Affiliated Network for Social Accountability-Cambodia (ANSA); Cambodian Institute for Democracy (CID); Transparency International Cambodia (TI-C); Advocacy and Policy Institute (API);
- JS6 **Joint submission 6 submitted by:** The Cambodian Centre for Human Rights (CCHR), the Cambodian Human Rights and Development Association (ADHOC) and the Centre for Law and Transformative Change (CLTC);
- JS7 **Joint submission 7 submitted by:** Cambodian Digital Rights Working Group (DRWG) and Asia Centre;
- JS8 **Joint submission 8 submitted by:** Cambodian League for the Promotion and Defense of Human Rights (LICADHO); Equitable Cambodia (EC); Sahmakum Teang Tnaut (STT); FIAN Germany;
- JS9 **Joint submission 9 submitted by:** ARTICLE 19; PEN America;
- JS10 **Joint submission 10 submitted by:** Rainbow Community Kampuchea Organisation (RoCK); Beautiful Life Organisation (BLO); Cambodian Center for Human Rights (CCHR); Micro Rainbow International Foundation (MRIF); Gender and Development for Cambodia (GADC); SILAKA Cambodia; Women Peace Makers Organization (WPM); Klahaan Organization; Reproductive Health Association of

- Cambodia (RHAC); Women's Network for Unity (WNU); Asian Region of the International Lesbian, Gay, Bisexual, Trans, and Intersex Association (ILGA Asia); APCOM Foundation; Asia Pacific Alliance for Sexual and Reproductive Health and Rights (APA); Asia Pacific Transgender Network (APTN); Asian Pacific Resource and Research Centre for Women – ARROW; ILGA World; RFSU – Sexual and Reproductive Rights for All; International Women’s Development Agency (IWDA); LoveisDiversity; SafeSpaceBTB;
- JS11 **Joint submission 11 submitted by:** SILAKA Cambodia; The Committee for Free and Fair Elections in Cambodia (COMFREL); Gender and Development for Cambodia (GADC); Women Peace Makers (WPM); Women’s Network for Unity (WNU); NGO-CEDAW
- JS12 **Joint submission 12 submitted by:** Cambodian Center for Human Rights (CCHR); Cambodian Human Rights and Development Association (ADHOC); Solidarity Center; Center for alliance of labor and human rights (CENTRAL); The Committee for Free and Fair Elections in Cambodia (COMFREL);
- JS13 **Joint submission 13 submitted by:** the International Commission of Jurists (ICJ); Land Watch Thai (LWT);
- JS14 **Joint submission 14 submitted by:** Gender and Development for Cambodia (GADC); SILAKA Cambodia; Women Peace Makers (WPM); The Committee for Free and Fair Elections in Cambodia (COMFREL); NGO-CEDAW; Banteay Srei; Women’s Network for Unity (WNU); Gender and Development Network (GADNet);
- JS15 **Joint submission 15 submitted by:** CIVICUS: World Alliance for Citizen Participation; The Asian Forum for Human Rights and Development (FORUM-ASIA);
- JS16 **Joint submission 16 submitted by:** Aide et Action (AEA); Buddhist for Social Development Action (BSDA); Cambodia Family Support (CFS); Community Council for Development Organization (CCDO); Children Action for Development (CAD); Khmer New Generation Organization (KNGO); Cambodian Organization for Living and Temporary-Care (COLT); Cambodia Centre for the Protection of Children's Rights (CCPCR); Child Helpline Cambodia (CHC); Italian Association for Aid to Children (CIAI); Cham Khmer Islam Minority Human Rights Development Association (CKIMHRDA); Children and Life Association (CLA); Cambodian Organization for Children and Development (COCD); Children and Poor Communities Development Organization (CPCDO); Child Rights Foundation (CRF); Community Training Organization for Development (CTOD); Cambodian Volunteers for Community Development (CVCD); Cambodian Women's Development Association (CWDA); ERIKS Development Partner (ERIKS); Good Neighbors Cambodia (GNC); Hagar International Foundation (Hagar); Happy Tree Social Services (Happy Tree); Homeland (Meatho Phum Ko’Mah) (Homeland); Improving Cambodia’s Society through Skillful Parenting (ICS-SP); Khemara (KHEMARA); Khmer Kampuchea Krom for Human Rights and Development Association (KKKHRDA); KnK Cambodia (KNK); Krousar Thmey (KrT); Khmer Youth Association (KYA); International Center for Children and Family (CIFA); Legal Aid of Cambodia (LAC); Mith Samlanh (Mith Samlanh); Operations Enfants du Cambodge (OEC); Planete Enfants and Development (PE & D); United World Schools (UWS); Plan International Cambodia (Plan); Phnom Srey

- Organization for Development (PSOD); Rural Aid Organization (RAO); Sunshine Cambodia (SC); Save the Children International (SCI); Street Children Assistance and Development Program (SCADP); Sacrifice Families and Orphan Development Association (SFODA); Koampia Phum Yoeung Organization (KPY); Santi Sena Organization (SSO); SOS Children's Villages Cambodia (SOS); Save Vulnerable Cambodians (SVC); Terre des Hommes Germany (TdH-G); Terre des Hommes Netherlands (TdH-NL); This Life Cambodia (TLC); Vulnerable Children Assistance Organization (VCAO); World Vision Cambodia (WVI); Wathnakteap (WP); Women Organisation for Modern Economy and Nursing (WOMEN); Non-Timber Forest Product (NTFP); Integral Cooperation Cambodia (ICC); Women's Media Center of Cambodia (WMC); Banteay Srei (BTS); M'lup Russey (MRO); Phare Ponleu Selpak (PPS); Cambodian Agency Development of Disability and the Poor (CADDP); Child Advocate Network (CAN); Adolescent and Youth Reference Group (AYRG); Cambodian Children and Young People Movement for Child Rights (CCYMCR);
- JS17 **Joint submission 17 submitted by:** Cambodian Center for Independent Media (CCIM); Advocacy and Policy Institute (API); Alliance for Conflict Transformation (ACT); Cambodian Institute for Democracy (CID); Cambodian Center for Human Rights (CCHR); Cambodian Female Journalist Network (CFJ); Cambodia Human Rights and Development Association (ADHOC); Cambodian Journalist Alliance Association (CamboJA); Center for Alliance of Labor and Human Rights (CENTRAL); The Committee for Free and Fair Elections in Cambodia (COMFREL); Community Legal Education Center (CLEC); Community Translation Organization (CTO); The NGO Forum on Cambodia (NGOF); Transparency International Cambodia (TIC); Youth Resources Development Program (YRDP);
- JS18 **Joint submission 18 submitted by:** Freedom House and Robert F. Kennedy Human Rights (RFK);
- JS19 **Joint submission 19 submitted by:** Commission of Inquiry for Cambodia; Save Cambodia;
- JS20 **Joint submission 20 submitted by:** Women Peace Makers (WPM); Gender and Development for Cambodia (GADC); SILIKA Cambodia; Women's Network for Unity (WNU); The Cambodian NGO Committee on CEDAW (NGO-CEDAW); Banteay Srei Organization (BS); Gender and Development Network (GADNet); The Committee for Free and Fair Elections in Cambodia (COMFREL); Klahaan Organization;
- JS21 **Joint submission 21 submitted by:** Nationality for All (NFA); Women Peace Makers Cambodia; Gender and Development for Cambodia; Khmer Community Development (KCD);
- JS22 **Joint submission 22 submitted by:** The International Federation for Human Rights (FIDH); the Cambodian Human Rights and Development Association (ADHOC);
- JS23 **Joint submission 23 submitted by:** Transparency International Cambodia (TI Cambodia); Advocacy and Policy Institute (API); Cambodia Institute for Democracy (CID); Cambodian Center for Independent Media (CCIM); Cambodian Journalist Alliance (CamboJa); Youth Council of Cambodia (YCC); NGO Forum on Cambodia (NGOF);
- JS24 **Joint submission 24 submitted by:** The Advocates for Human Rights; The Committee for Paris Peace Accords on Cambodia, Minnesota, (CPPAC-MN);
- JS25 **Joint submission 25 submitted by:** Women's Network for

- JS26 Unity (WNU); Sexual Rights Initiative;
Joint submission 26 submitted by: Center for Alliance of Labor and Human Rights (CENTRAL); Banteay Srei; Building and Wood Workers Trade Union Federation of Cambodia (BWTUC); Cambodian Alliance of Trade Unions (CATU); Cambodian Food and Service Workers Federation (CFSWF); Cambodian Informal Economy Workers Association (CIWA); Cambodian Tourism and Service Workers' Federation (CTSWF); Cambodian Youth Network (CYN); Coalition of Cambodian Apparel Workers' Democratic Unions (C.CAWDU); Gender and Development for Cambodia (GADC); Labour Rights Supported Union of Khmer Employees of NagaWorld (LRSU); Solidarity Center Cambodia (ACILS); The Affiliated Network for Social Accountability Cambodia (ANSA Cambodia); The Free Independent Trade Union Federation (FUFU); The Free Trade Union of Workers of the Kingdom of Cambodia (FTUWKC); The Independent Democratic Association of the Informal Economy (IDEA); The Independent Trade Union Federation (INTUFE); The People Center for Development and Peace (PDP); Transparency International Cambodia (TI Cambodia); Youth Resource Development Program (YRDP);
- JS27 **Joint submission 27 submitted by:** Cambodia Indigenous Peoples Alliance (CIPA); Asia Indigenous Peoples Pact (AIPP); Indigenous Peoples Rights International (IPRI).

³ *The following abbreviations are used in UPR documents:*

ICERD	International Convention on the Elimination of All Forms of Racial Discrimination
ICESCR	International Covenant on Economic, Social and Cultural Rights
OP-ICESCR	Optional Protocol to ICESCR
ICCPR	International Covenant on Civil and Political Rights
ICCPR-OP 1	Optional Protocol to ICCPR
ICCPR-OP 2	Second Optional Protocol to ICCPR, aiming at the abolition of the death penalty
CEDAW	Convention on the Elimination of All Forms of Discrimination against Women
OP-CEDAW	Optional Protocol to CEDAW
CAT	Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment
OP-CAT	Optional Protocol to CAT
CRC	Convention on the Rights of the Child
OP-CRC-AC	Optional Protocol to CRC on the involvement of children in armed conflict
OP-CRC-SC	Optional Protocol to CRC on the sale of children, child prostitution and child pornography
OP-CRC-IC	Optional Protocol to CRC on a communications procedure
ICRMW	International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families
CRPD	Convention on the Rights of Persons with Disabilities
OP-CRPD	Optional Protocol to CRPD
ICPPED	International Convention for the Protection of All Persons from Enforced Disappearance

⁴ HRF, para. 34(b).

⁵ CLW, p. 9. See also JS26, para. 4.29.

⁶ AI, para. 40; CLW, p. 9; and JS26, para. 4.26.

⁷ JS21, p. 7.

⁸ JS15, p. 18.

⁹ AC, p. 5.

¹⁰ JS23, paras. 4, 42(1), and 42(4).

¹¹ CLW, p. 9. See also JS6, p. 6.

¹² JS21, para. 9.

- ¹³ JS3, p. 5.
- ¹⁴ ICJ, para. 19. See also JS6, para. 43.
- ¹⁵ JS15, para. 3.3.
- ¹⁶ HRF, para. 34(e).
- ¹⁷ JS22, paras. 52–53.
- ¹⁸ AI, paras. 14, 17 and 18.
- ¹⁹ JS24, p. 9. See also AI, para. 39; and JS22, paras. 54 and 61.
- ²⁰ JS6, p. 4. See also JS22, para. 61; and JS24, p. 9.
- ²¹ JS22, para. 61.
- ²² ECP, para. 1.3.
- ²³ AI, para. 47.
- ²⁴ JS3, p. 5.
- ²⁵ JS24, p. 9.
- ²⁶ JS6, paras. 51–52. See also HRW, p. 1.
- ²⁷ JS23, para. 16. See also ICJ, para. 13.
- ²⁸ ICJ, para. 24.
- ²⁹ *Ibid.*, para. 18.
- ³⁰ JS6, p. 5.
- ³¹ JS18, paras. 38–40.
- ³² JS6, p. 7.
- ³³ *Ibid.*
- ³⁴ JS17, para. 2. See also JS5, p. 7.
- ³⁵ ICJ, para. 3. See also JS17, paras. 6–7.
- ³⁶ HRW, p. 1. See also HRF, para. 30.
- ³⁷ JS12, para. 13.
- ³⁸ JS9, para. 29.
- ³⁹ JS17, para. 73. See also JS9, para. 29.
- ⁴⁰ JS12, p. 7. See also HRF, para. 34(a); JS2, p. 6; and JS3, p. 7.
- ⁴¹ JS15, p. 16.
- ⁴² JS3, p. 7.
- ⁴³ JS12, p. 9. See also JS7, para. 41.
- ⁴⁴ ANFREL, para. 12. See also JS5, p. 9.
- ⁴⁵ JS9, para. 23.
- ⁴⁶ ANFREL, para. 12.
- ⁴⁷ HRW, p. 1.
- ⁴⁸ JS12, paras. 31–32. See also HRW, pp. 3–4; and JS7, paras. 27–28.
- ⁴⁹ HRW, p. 4. See also ANFREL, p. 5; and JS1, para. 28(xii).
- ⁵⁰ JS9, para. 25. See also HRW, p. 4.
- ⁵¹ HRW, p. 4. See also HRF, para. 34(d); and JS17, para. 67.
- ⁵² JS12, p. 9. See also JS18, para. 62.
- ⁵³ JS4, para. 67.
- ⁵⁴ JS15, p. 16. See also ANFREL, para. 10; and JS1, para. 22.
- ⁵⁵ JS15, para. 5.5.
- ⁵⁶ JS1, para. 28(xi).
- ⁵⁷ JS15, p. 17.
- ⁵⁸ JS9, para. 49.
- ⁵⁹ HRW, p. 1. See also JS5, p. 4.
- ⁶⁰ JS17, para. 17.
- ⁶¹ ANFREL, p. 5. See also HRW, p. 2; JS5, p. 9; and JS19, para. 4.
- ⁶² HRW, p. 2.
- ⁶³ *Ibid.*
- ⁶⁴ JS17, para. 57.
- ⁶⁵ ICJ, para. 8.
- ⁶⁶ JS12, para. 35.
- ⁶⁷ JS17, para. 76.
- ⁶⁸ HRF, para. 34(d). See also JS9, para. 20.
- ⁶⁹ JS4, paras. 58 and 61. See also JS9, para. 14.
- ⁷⁰ JS13, para. 15.
- ⁷¹ AI, paras. 6, 7 and 9. See also CLW, paras. 13–15.
- ⁷² JS16, p. 9.
- ⁷³ *Ibid.*, p. 10.
- ⁷⁴ CLW, p. 9.

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- 75 JS26, para. 1.1. See also CLW, para. 19; and JS15, para. 2.5.
76 HRW, p. 5. See also JS13, p. 7; JS26, paras. 4.6 and 4.16.
77 HRW, p. 5. See also JS13, p. 7.
78 JS12, p. 11.
79 JS13, p. 7.
80 Ibid., pp. 6–7.
81 JS26, para. 4.26.
82 JS16, p. 6.
83 CDPO, para. 32.
84 JS3, para. 6.
85 JS22, para. 2.
86 Ibid., para. 8. See also AI, paras. 10–12; JS3, para. 15.
87 AI, para. 30.
88 JS3, p. 9. See also JS13, p. 7.
89 JS16, para. 14.
90 Ibid., p. 5.
91 JS8, para. 33.
92 JS25, para. 12.
93 BC, para. 12.
94 JS8, para. 35.
95 BC, para. 15.
96 Ibid., para. 19.
97 JS16, p. 8.
98 Ibid., p. 9.
99 BC, para. 20.
100 CDPO, para. 23.
101 JS21, p. 7.
102 JS27, para. 68.
103 JS3, para. 6.
104 JS9, para. 28.
105 JS13, p. 6.
106 JS20, pp. 2 and 4.
107 Ibid., p. 5.
108 Ibid., p. 6.
109 JS11, para. 6.3.
110 JS14, para. 3.2.1.
111 JS16, p. 2.
112 ECLJ, para. 17.
113 JS16, para. 24.
114 Ibid., para. 16.
115 Ibid., p. 6.
116 CDPO, para. 17.
117 Ibid., para. 20.
118 JS16, para. 24.
119 JS3, para. 23. See also JS22, para. 13.
120 AI, para. 24.
121 JS3, p. 11. See also AI, para. 41; and JS22, para. 17.
122 JS3, p. 13.
123 JS27, para. 26.
124 Ibid., para. 44.
125 Ibid., para. 56.
126 JS10, para. 6.
127 JS16, paras. 9–10.
128 JS10, p. 5.
129 JS21, para. 11.
130 JS2, paras. 7 and 16.
131 JS21, para. 26.
132 Ibid., p. 6.
133 Ibid., p. 7.
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