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# INTERNET MONITORING AND ACTION PROJECT

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# PROJECT STATUS

## Project title:

Internet Monitoring Action Plan 2020-2024

## Project period

November 1, 2021, to September 30, 2024

## Grant Number

G-1929-21-100-3046-20

## Funder

United States Department of State (DOS)

## Prime Award Program Name and Implementer

Internet Monitoring and Action Project (iMAP)

## Implemented

The East-West Management Institute, Inc. (EWMI)

## Implementing Partners

The Advocacy and Policy Institute (API)



# EXECUTIVE SUMMARY

## Project Goal

Promote and safeguard Internet freedoms through better civil society understanding of Internet censorship, digital rights, and safety.

### Objective 1

Civil society and active citizens are trained on internet freedom, digital rights, and digital safety as a complement to API's advocacy and A2I capacity development training.

During the reporting period, four (04) reports were developed, exceeding the target of three (03) reports on Internet Censorship for Cambodia. These reports are available on an annual basis and are used to inform civil society action and advocacy and cover the period from 2021 to 2024. These annual reports revealed that the OONI Probe Tools was run 6,566,328 times to monitor internet censorship across 1,940 tested websites. The reports detailed 145 websites that were blocked, with 43 blocked in year 1, 37 in year 2, and 65 in year 3. Additionally, 119 websites were identified as non-accessible during specific periods, including information on their names, blocking durations, methods used for blocking, and the Internet Service Providers involved. This report was presented to the European Union, the Australian Embassy, EuroCham, USAID, and development partners in a joint working group meeting and shared with the youth network and relevant Ministries.

There were (05) networks of the Cambodian OONI (Open Observatory of Network Interference) formed and sustained to run the OONI, surpassing the target of three (03) networks.

There were 894 participants (319 women) who attended the project implementation,

**OOONI**  
Open Observatory of Network Interference

**Global community measuring Internet censorship since 2012**

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including Training, OONI running, semi-annual national OONI network meetings, and Phnom Penh Internet Forum and refresher training and coaching, they are from development partners (DP), civil society organizations (CSOs), Digital Rights Working Group and youth networks.

During the reporting period, five (05) training courses were conducted. The training curriculum covered topics such as access to information, online information, monitoring internet censorship, understanding digital rights, promoting Internet Freedom, and advocating for the use of OONI Probe Tools. Additionally, the training aimed to establish networks among CSOs and youths to increase the number of measurements conducted using the OONI Probe.

### Refreshing the OONI Network and Holding Consultative Meetings:

- The draft Cambodia 2024 Internet Censorship Report was reviewed in consultation with Civil Society Support (CSS) partners, members of the Digital Rights Working Group, the Access to Information Working Group, the Coalition for Partnership in Democratic Development (CPDD) Working Group, youth representatives, Family Health International (FHI 360), and the International Center for Not-for-Profit Law (ICNL). Those who contributed to the consultation provided feedback for drafting the Cambodia Internet Censorship Report yearly.
- To serve digital rights and freedom of expression, API as a member of the Digital Rights Working Group, contributed to DRWG's advocate strategy, to achieve this strategy we conducted the meeting to discuss the activities plan strategy, shape Cybercrime draft law, Data Protection, Cybersecurity, Internet Gateway, domain names again the international standard and preparations for the Phnom Penh Internet Forum (PPIF), which was organized by the Digital Rights Working Group (DRWG) and co-hosted by API, Youth Resource Development Program (YRDP), and Open Development Cambodia (ODC).

**OONI**  
Global Community Uncovering Internet Censorship

Install **OONI Probe** app and measure internet censorship!  
<https://ooni.org/install/mobile/>

Visit **OONI Explorer** to discover evidence of internet censorship through open data.  
<https://explorer.ooni.org/>

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@OpenObservatory @ooni  
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The Phnom Penh Internet Forum (PPIF) was celebrated every year, PPIF yielded significant outcomes that shaped the future of digital rights in Cambodia. This collaborative approach ensures ongoing dialogue between CSOs and the private sector, including internet service providers. The forum emphasized the importance of the Draft Law on Cyber Crimes, Data Protection Law, Cyber Security, and Access to Information, urging the Cambodian government to align it with international human rights standards. Experts and stakeholders, including representatives from NGOs and law firms, stress that meaningful consultation with all relevant parties, especially main sector players and citizens, is crucial to ensuring the legitimacy and effectiveness of laws. A report detailing the forum's findings will be accessible through the PPIF's social media channels, promoting transparency and continued engagement. The organizing team, DRWG, is committed to hosting the forum annually to sustain momentum in advocating for digital rights.

## ACTIVITIES AND RESULTS FOR THREE YEARS

The overall objective of the project: Promote and safeguard Internet freedoms through better civil society understanding of Internet censorship, digital rights, and safety in advocacy.

### Objective 1: The Internet Censorship Report For Cambodia Is Available Annually And Used To Inform Civil Society Action And Advocacy.

#### Activity 1.1: Internet Censorship Data Entry Using Open Observatory Of Network Interference (OONI)

A total of six (06) out of the targeted four (04) OONI networks were created, and 99 members, including NGO staff, journalists, and activists, were introduced to iMAP and OONI tools. They learned how to monitor internet censorship through <https://explorer.ooni.org/> and shared insights on the digital rights situation.



The breakdown of participants is as follows:

- Advocacy and Policy Institute (API) staff: 37 members
- Digital Right Working Group (DRWG): 14 NGOs with 14 members
- Access to Information Working Group (A2IWG): 21 NGOs
- Social Accountability Working Group (ISAF): 15 NGOs with 15 members
- Mobilization and support Team: 8 NGOs with 20 members.
- Activists of API on Social Accountability (ISAC) in Kandal province (Ta Khmau municipality) and Phnom Penh (Sen Sok District): 10 members.

The iMAP report and OONI tools were presented to the OONI team, which included participants from the NGOs, activists, and Journalists listed above, with 28 members attending. Additionally, 24 participants from various organizations, including ODC, Activist, BHR, API staff, CPDD, YCC, CISA, YRDP, and Kawsang participated in the semi-annual national network.

### Activity 1.1.1. To document Internet censorship and the nature of such regulation.

The reference of the document on internet censorship and the nature of such regulation which refers to the reports on the iMAP Internet Censorship Report 2022 to 2024 was obtained from:

- During the reporting period, 10 youths (including 9 women) were selected, and two orientation meetings were conducted to run the OONI and monitor the progress of the daily plan. During the reporting period, 10 youths and NGOs were supported in installing and running the OONI Probe.
- The real overview idea of group discussion from the iMAP training (iMAP local network meeting and semi-meeting) on the overall expression of digital rights, freedom of expression, and digital security.
- Other sources included quoted content and real information from 31 articles sourced from government and NGO websites, such as Freedom House, and Fresh News Asia, the United Nations Human Rights (State of Press Freedom), data portals, Phnom Penh Post, the Telecom Regulator of Cambodia, and others.
- Four (04) Cambodia Internet Censorship/key finding Reports were produced based on data from 2022 to 2024. During this period, the Open Observatory of Network Interference (OONI Probe Tools) was run 6,566,328 times, testing 1,940 websites to monitor internet censorship. Of these, 145 websites were identified as blocked, and most of the identified websites were blocked using DNS blocking methods by 31 Internet Service Providers (ISPs). Viettel Cambodia (Metfone), a Vietnamese-owned company, was the top blocker, having blocked all the identified domains. iSeek Communications ranked second in the number of blocked websites. Other companies, such as M247 Europe SRL, Cogetel Online, Smart Axiata, WiCAM, EZECOM, and several others, also blocked various websites.

## Activity 1.2: Annual Cambodia country report on Internet Interference and Censorship, disseminated to relevant civil society working group(s) for joint advocacy.

- In October 2022, the final state report on internet censorship and the 7th Cambodia General Election report was released on the following websites: [API News](#) | [API \(apiinstitute.org\)](#), [Sinar Project website](#), [ODC website](#), [7th Cambodia General Elections](#).
- In October 2023, the final state report on internet censorship was released on the following website: [API News](#) | [API \(apiinstitute.org\)](#)
- In October 2024, the final state report on internet censorship was released on the following website: [API News](#) | [API \(apiinstitute.org\)](#)
- The iMAP state of the Internet Censorship report was presented and Dissemination to ODC, Activist, BHR, API staff, CPDD, YCC, CISA, YRDP, Digital right working group, and Kawsang.
- At the Cambodia People Forum (Convergence space 3: "Digitalization Impactful on Human Safety and Security"), around 200 participants attended the presentation of the state report on internet censorship and key findings from January to June 2022.
- Four (04) reports (iMAP Cambodia 2023 and 2024 Internet Censorship, and 7th General Election) were produced in both English and Khmer versions. The report process was as follows:
  1. API drafted the two reports,
  2. The reports were consulted with the Civil Society Organization groups including Access to Information (A2I) and Digital Rights Working Group (DRWG) for input on the report and two DRWG members would prefer to put their organization names in the reports,
  3. The final reports have been sent to the SINA team, who provided the technical, and overview of the whole report,
  3. The reports had been publicly released on the websites.



- Advocacy Policy Institute was invited to be interviewed by Hello VOA to discuss the key findings of the iMAP Cambodia 2023 Internet Censorship and Legal update. API Executive Director, Mr. Lam Socheat, shared that this is the second report of the Internet censorship report (iMAP Cambodia 2023 Internet Censorship Report), following the dissemination of the previous report (iMAP Cambodia 2022 Internet Censorship Report) at the Asian People Form. To monitor internet censorship interference, the OONI Probe Tools is used daily. The report identified 37 websites from various categories such as News, Date, XED, and Games. Mr. Socheat noted that while internet service providers, influenced by the government, blocked game websites, some independent websites were blocked. The reports clearly state the name of the blocked website and the period of blocking during which they were blocked. The purpose of this report is to promote digital rights and freedom of expression through the Internet because citizens rely on smartphones to access online information and communicate with the government and Internet Service Providers (ISPs). However, the reasons behind the website blockages remain unclear. As a result, CSOs and API intend to bring these reports to government authorities and ISPs to discuss why these websites were blocked. The Ministry of Post and Telecommunications is drafting several laws, including the Cybercrime Law, Security Law, Domain Law, and Internet Gateway Law. Mr. Socheat acknowledged that some of these laws are beneficial, but others, such as the Access to Information and Cybersecurity Laws have allowed CSO input. He emphasized the need for public release and open consultations with CSOs and relevant sectors to ensure the laws are aligned with international standards. He expressed hope that all the laws would be released soon and that the public would collectively respect and follow these laws.
- API Attended the monthly Digital Rights Working Group (DRWG) meetings and contributed, and focused on topics related to Digital Rights and included updates on the iMAP report, Digital Rights Universal Periodic Review (UPR), Freedom of Expression UPR, general election updated, activists' arrests, and legal environment in Cambodia.



- API attended the regional Digital Right Asia Pacific Assembly (DRAPA) workshop at Chiang Mai to build and expand knowledge of digital rights cases and experiences from the network. The workshop hosted over one hundred sessions, with multiple sessions scheduled simultaneously, allowing participants to attend topics of their interest. Over five days, several topics related to human rights, AI, and digital security were explored, including iMAP presentations. Particularly noteworthy sessions covered countering hate speech, internet shutdowns, digital security helplines, digital privacy toolkits, the Internet Monitoring Action Project (iMAP) by the Sinar Project Team, digital rights and trade agreements, feminist tech organizing in the Asia Pacific and exploring bridges between the digital rights movement in the region. The knowledge gained from these sessions will be incorporated into the Digital Right and Freedom of Expression module, with technical insights, such as password management, cybersecurity protection, and cloud data storage, applied within API's organizational practices.
- Updated on the progress of five (05) Draft Laws by the Ministry of Post and Telecommunication:
  1. **Cybercrime Law:** The Ministry has insisted on releasing the final draft of the Cybercrime Law for public input. This will give Civil Society Organizations (CSOs) adequate time to review and provide feedback, and it is now submitted to the Ministry of Council.
  2. **Cybersecurity Law:** Some suggestions have been submitted to the Ministry of Post and Telecommunications. However, CSOs have not received any response from the Ministry.
  3. **Personal Data Protection Law:** This Law has been officially shared with certain CSOs working on digital rights and freedom of expression materials to provide input.
  4. **Domain Name Law:** This law mandates companies to register a national domain (.kh) for their websites and emails by January 2023. Although the deadline has not been strictly enforced, CSOs have not yet passed the law.
  5. **Internet National Gateway (ING) Draft Law:** The first draft of the ING law has been initiated, citing national safety and security protection as justification. However, critics argue that these legal measures are being used by the Cambodian government to increase control over internet usage, thereby infringing on citizens' fundamental rights to freedom of expression.



*iMAP training A2I and DRWG*

- The Digital Rights Working Group (DRWG) contributed to seven (07) key recommendations provided by its members in the Universal Periodic Review (UPR) report. These recommendations largely focus on the following:
  1. Ensuring internet-related laws are enacted in the country,
  2. Revising or repealing restrictive laws and regulations that limit internet freedoms,
  3. Disseminating internal drafts and improving the process of public consultation during legislative processes to gather wider inputs from civil society actors,
  4. Enacting the Law on Access to Information and committing to ending online harassment of civil society actors and opposition politicians,
  5. Increasing internet access for citizens to ensure all Cambodians can receive news online,
  6. Enhancing digital literacy education, both in formal settings such as schools and universities, as well as in informal education settings, and
  7. Promoting media literacy, enabling Cambodians to distinguish reliable sources of information from unreliable ones and critically evaluate the news they receive.
- The DRWG meeting was conducted with representatives from 18 NGOs, Development Partners (DPs), UN agencies, and Embassies participating. The meetings covered a range of critical topics, including:
  1. UPR discussions on access to information, digital rights, internet freedom, freedom of expression, and media freedom with DPs,
  2. Priority action plans and budget proposals,
  3. OONI updates, along with announcements for iMAP and OONI data analysis training,

4. Planning for the Phnom Penh Internet Forum (PPIF) and discussions on domain names,
  5. Meeting with USAID's delegation regarding digital rights,
  6. Online content regulation training conducted on June 17 by Asia Centre,
  7. Brazil's plan to open an embassy in Cambodia, with a focus on freedom of expression,
  8. Online exchange sessions with regional partners, including a partner in Taiwan (TaiW).
- Universal Periodic Review (UPR) on access to information, digital rights and internet freedom, freedom of expression, and media freedom, and recommendations were briefed to 12 development partners (DPs), UN agencies, and Embassies to gain support in international advocacy campaigns.



- The DRWG took immediate actions regarding the Cybercrime Law advocacy, which included the following steps:
  - The Cybercrime Advocacy sub-group, which includes API, is responsible for updating information and communication between the DRWG and the NGO Forum. The NGO Forum, in turn, is responsible for communicating with the government.
  - The DRWG has organized a local consultative workshop involving local lawyers supported by FHI360 and CSOs.
  - The DRWG shared the final Cybercrime analysis with OHCHR, development partners, big tech Companies (Meta, Amazon, Google), AmCham, EuroCham, and the Asian Internet Foundation.
  - The consolidated final analysis of the Cybercrime Law, incorporating inputs, comments, and suggestions from relevant sectors, will be sent to government and State bodies, like the Ministry of Interior, Ministry of Justice, National Assembly, Senate, and Cambodia Human Rights Committee.

## Objective 2: Civil Society And Active Citizens Are Trained On Internet Freedom, Digital Rights, And Digital Safety As A Complement To API'S Advocacy And A2I Capacity Development Training.

### Activity 2.1: Develop a training module on internet freedom, digital rights, and safety complementing advocacy and A2I curricula for CSOs and active citizens.

API cooperated with CLEC to update the modules of Digital Rights, Freedom of Expression, Digital Security, and Advocacy that were written in 2022 for use as the document in training and delivered to the participants during the training, thus they will use them as a document in the implemented the project and attended the CLEC Digital Right and Freedom Expression guideline.

The training module of the Access to Information (A2I), Digital Rights, Internet Freedom, Digital Security lesson, Internet Censorship, and Advocacy had been developed and used as the resource to create the training document for the OONI team.

### Activity 2.2: Conduct training policy advocacy training advocacy to select civil society actors and active citizens

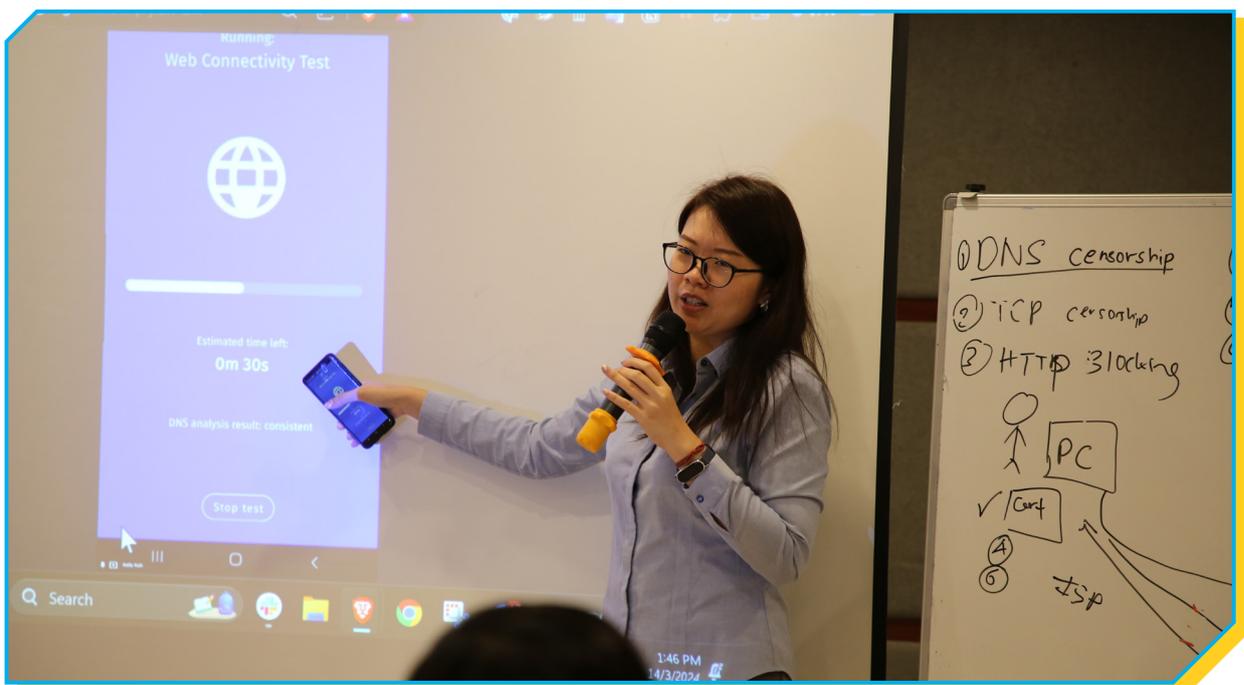
Four (04) training sessions exceeding three (03) targeted sessions on Digital Rights, Internet Freedom, Digital Security, Advocacy were provided to 30 participants (12 women) from the Access to Information (A2I) and Digital Rights Working Group (DRWG). The participants were selected based on their involvement in advocacy and engagement in freedom of speech, internet freedom, and digital privacy. The training aimed to enhance participants' knowledge and skills to advocate for internet freedom.

Digital Security training was specifically requested by CLEC for the Consultative Workshop on Digital Rights and Freedom of Expression Guidelines. The agenda focused on internet safety, particularly cybersecurity practices. As a result of the training, participants learned to protect themselves from cyberattacks, including link attacks, virus protection, and browser configuration with Cloudflare DNS, using VPNs like Psiphon, to prevent hacker attacks.

API received monthly coaching from the Sinar Project team, which provided technical support for the Internet Monitoring Action Plan (iMAP), conducted detailed data analysis, and produced annual Country Internet Censorship Report.

# LESSONS LEARNED

- The report utilizes data released from the OONI probe tools, which is crucial for closely collaborating with existing networks like DRWG and A2I, as well as creating new activist networks. The more OONI runners involved, the more comprehensive the data becomes, allowing for better analysis in reports.
- Increasing the number of organizations endorsing the reports strengthens the advocacy efforts aimed at the government, particularly in addressing internet censorship.
- The results of the report, based on technological evidence, make it easier to present convincing proof to the government.
- The report has been thoroughly reviewed by the Sinar Project team and has been publicly released.
- To better empower young people in project activities, flexibility in scheduling and open discussions with youth before involving them in the projects is necessary.
- API continued to engage with embassies and development partners to communicate, advocate, dialogue, and lobby government authorities, civil society organizations, community members, and youth about the Cambodia 2024 Internet Censorship report, as well as participating in the Phnom Penh Internet Forum (PPIF).
- In light of the political tension, the policy dialogue with the government and collaboration with development partners who influence governmental decisions have become crucial advocacy strategies.



# CHALLENGES

- The default auto-running will randomly run the global and local websites, not the specific websites that we want to monitor.
- Youth groups have been preoccupied with their studies and have not been able to fully participate in the project activities. NGOs, likewise, have been busy with other tasks and have faced staff changes. In response, API adapted by scheduling project activities with youth groups on weekends and strengthening collaboration with NGO partners for better participation.





វិទ្យាស្ថានគំរូមតិ និងគោលនយោបាយ  
ADVOCACY AND POLICY INSTITUTE

## ADVOCACY AND POLICY INSTITUTE

**A leading Cambodian NGO active in advocacy,  
policy influencing, capacity building,  
good governance and dialogue facilitation  
between citizens and state actors**

*The Advocacy and Policy Institute (API) is a Cambodian non-governmental organisation active in advocacy, policy influencing, good governance and civic engagement. Capacity building and dialogue facilitation are at the heart of our efforts towards democratic and sustainable development.*

*We have received widespread acclaim from both local and international organisations for our reliability, relevance and professionalism. Over a time span of almost two decades, API has helped institutionalise advocacy skills and has been striving to make local democratic and accountable governance a reality. To these ends, we have been conducting more than 300 training courses for over 10,000 participants affiliated with civil society and community-based organisations, local councils, media outlets, trade unions, Government institutions and the Cambodian Parliament.*

*API is unique in the Cambodian civil society in serving as a connector and facilitator for citizens' empowerment in their interaction with government at all levels. API has acquired first-hand experience on policy issues like access to information (A2I) through its grassroots work. Based on this vast experience, we are in the best position to make the voices of ordinary citizens count in policy-making at the national level. Here we have been trying to support government actors serve citizens according to the law and contribute to an enabling environment for citizens and civil society to express their concerns. Finally, we have been playing an important role in helping citizens understand their rights, access to information and make use of the opportunities for engagement offered by various laws and government policies.*

*Our programmes are guided by a human rights based approach. API serves all Cambodians and values the diversity of gender, sexual orientation and identity, (dis)ability, ethnicity, faith and political opinions. At the same time, we are especially committed to supporting the most disadvantaged in their efforts to make their voices heard.*

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