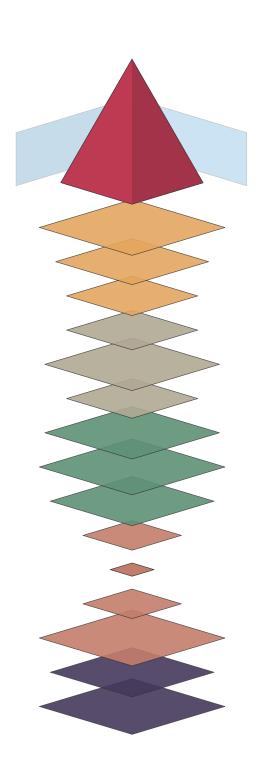




# CAMBODIA







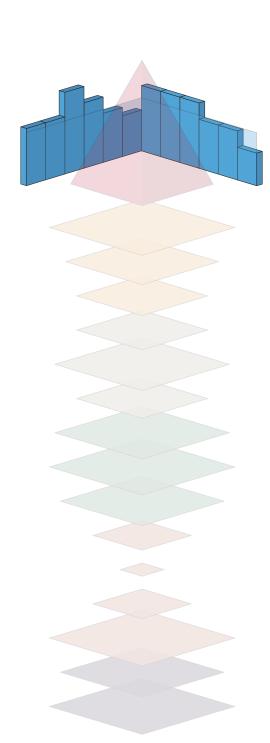








# CAMBODIA











## **CRIMINALITY**

### CRIMINAL MARKETS

#### **PEOPLE**

Cambodia is a major source, transit and destination country for human trafficking. Victims include Cambodian nationals trafficked abroad and foreign nationals lured into the country under false pretences. Sex trafficking is rampant within Cambodia, affecting both local and foreign victims, with Cambodian and Vietnamese women and children particularly vulnerable. Forced labour is also widespread - both within Cambodia and among Cambodian workers abroad - especially in construction, fishing, agriculture and domestic work. Many are coerced into labour through debt bondage. Foreign nationals are increasingly trafficked into Cambodia to be exploited in cyber scam operations, which have spread across both urban and rural regions. Notable hotspots include Sihanoukville, Phnom Penh, Poipet, Bavet and Takeo. Victims, sourced globally, endure forced labour and/or sexual exploitation and in some cases, are sold between compounds. The market continues to expand amid a weak state response and alleged complicity by state-embedded actors at all levels of government.

Human smuggling is widespread, with Cambodians relying on smuggling networks to travel to neighbouring countries, especially Thailand. Economic pressures and wage disparities drive Cambodians to seek employment abroad, often facilitated by brokers or relatives. Many smuggled individuals face physical violence, exploitative conditions and trafficking-like practices. Reports indicate that some state officials profit from the trade through bribery, further entrenching impunity.

Extortion and protection racketeering are also significant concerns. Criminal networks – primarily involving Chinese nationals and other South East Asian groups – dominate this space. These extortion-related activities often overlap with other serious crimes, including kidnapping, homicide and drug and weapons trafficking, and are perpetrated by a mix of both local and foreign criminal actors.

#### **TRADE**

Arms trafficking in Cambodia is fuelled by the sale of weapons from police and military stockpiles, along with a rise in domestic production. These arms have been traced to insurgents in Thailand and conflict zones in Myanmar. Illegal firearm possession and usage are increasing, with incidents involving criminal groups, foreign nationals and even high-level security personnel. While the government has publicly supported crackdowns and initiatives led by the Association of Southeast Asian Nations to combat

arms smuggling, significant enforcement gaps and official complicity undermine these efforts.

Cambodia's counterfeit market is widespread, with counterfeit goods such as textiles, footwear and pharmaceuticals readily available in local markets. Phnom Penh's Toul Tompoung market, for example, is known for selling fake shoes, bags and clothing to both locals and tourists. The counterfeit trade is increasingly moving online, particularly with the emergence of 'online pharmacies' selling counterfeit medicines.

The illicit trade in excise goods – especially alcohol and cigarettes – remains a persistent challenge. High taxes, weak enforcement and a large informal economy drive demand. The line between legal and illegal sales is often unclear, particularly among informal vendors who sell single cigarettes or unregulated alcoholic beverages. A recent spike in excise taxes has further pushed consumers towards cheaper, illicit alternatives, negatively affecting public health and legitimate manufacturers. Although authorities have launched public awareness campaigns and taken enforcement actions – such as temporary alcohol bans and targeted arrests – their effectiveness has been limited. These efforts are further undermined by corruption, as evidenced by allegations of bribery involving regulatory officials.

#### **ENVIRONMENT**

Cambodia faces widespread flora-related crimes, particularly illegal logging. Significant quantities of luxury timber are exported to neighbouring countries, especially via Vietnam to China, where demand is high. Although Vietnam bans such imports, much of Cambodia's timber continues to be laundered across the border. Corrupt officials and politically connected businesses enable this trade. Criminal operations often exploit legal concessions to launder illicit timber, while illegal roads and purpose-built infrastructure facilitate deeper incursions into forested areas. Small-scale loggers from impoverished communities are recruited to harvest and transport timber, with profits ultimately benefiting organized criminal groups.

Fauna crimes are also widespread. Cambodia serves as a source, transit and destination country for wildlife trafficking. Species such as pangolins, macaques and exotic birds are frequently targeted, often destined for markets in China and Vietnam. The macaque trade – recently exposed for extensive laundering – highlights how legal trade channels are exploited for illicit purposes. While awareness campaigns and limited enforcement actions exist, persistent corruption and the continued use of snares and traps severely hinder conservation efforts. Illegal, unreported and unregulated fishing remains prevalent despite government initiatives.



Non-renewable resource crimes, including sand and gold mining, remain significant. Although official figures suggest regulated trade, major discrepancies between Cambodia's export and import data in sand shipments point to a large-scale black market. Unregulated sand dredging has caused severe ecological degradation, affecting river systems and communities reliant on fishing. Government concessions often overlap with protected areas, with Chinese and Cambodian tycoons being key actors in the market. The issuance of permits despite the environmental risks suggests systemic corruption within government agencies. While some operations have been shut down, many continue under the protection of influential actors. Illegal gold mining is similarly entrenched in Cambodia, with foreign companies - particularly from China - playing a prominent role. Some operate without permits and have close ties to senior Cambodian officials. Toxic waste from these operations, including cyanide-laced tailings, has polluted rivers, affecting agriculture, drinking water and fisheries across vast regions.

#### **DRUGS**

Cambodia serves as both a transit and destination country for heroin, with Chinese and Taiwanese groups implicated in trafficking. Although heroin is not the most prevalent drug in the country, seizures and arrests have been increasing. Corruption remains a barrier to enforcement and reports of drug-related violence are common.

The cocaine market remains limited. Distribution appears to be a spillover from the small market in Thailand, with some involvement from transnational networks, primarily of West African origin. However, there is currently no indication that these groups have the capacity to expand significantly within Cambodia. High prices and low domestic demand keep cocaine's role in the country's drug landscape marginal.

Cannabis is widely cultivated and consumed, particularly in rural areas. Despite being illegal, the drug is openly sold in tourist areas, where cultural acceptance contributes to its visibility. Domestic production supports both the domestic market and regional trade. Law enforcement efforts largely prioritize harder drugs, and cannabis-related arrests are relatively infrequent.

Cambodia's synthetic drug market is considerably more influential. The country has become a major production and transit hub, particularly for ketamine and methamphetamine. Drug seizures and raids on ketamine labs have increased recently, and transnational networks from China, Taiwan and neighbouring countries are heavily involved. Trafficking routes span the region, with synthetic drugs exported to markets such as South Korea and Australia. Despite some enforcement successes, the trade persists, driven by sustained demand, systemic corruption and regional connectivity.

#### **CYBER-DEPENDENT CRIMES**

Cambodia faces a growing threat from cyber-dependent crimes, fuelled by increased internet connectivity and online activity. Incidents of malware infections and unauthorized system access are on the rise. Weak cyber infrastructure, institutional shortcomings and low public awareness of information and communications technology contribute to the nation's heightened vulnerability to cyber threats.

#### **FINANCIAL CRIMES**

Financial crimes are widespread, driven by weak regulatory frameworks and entrenched corruption. Common offences include fraudulent investment schemes, property scams and the misappropriation of public funds. Microfinance institutions and prominent business figures have been implicated in scams estimated to be worth millions of US dollars. A particularly concerning trend is the rise of cyberenabled fraud, including romance scams and cryptocurrency schemes, orchestrated by sophisticated criminal groups. These operations are active across the country and often involve coordination between Chinese criminal groups and local actors. In some cases, human trafficking victims are forced to carry out these scams. While authorities have launched public awareness campaigns and restricted access to fraudulent websites, enforcement remains limited.

## CRIMINAL ACTORS

Cambodia is home to multiple mafia-style groups operating across illicit sectors, including environmental crimes, human trafficking and cybercrime. These groups often function at the intersection between legality and illegality, with blurred boundaries between criminal actors, private businesses and state representatives. Some influential individuals are reported to lead groups that dominate the illegal timber trade, supported by networks involving forest rangers, police, military personnel and government officials. These groups exert territorial control over forested areas, using checkpoints and political influence to monopolize markets and restrict access. They are active across various provinces and are embedded within both state and military institutions.

Mafia-style groups maintain strong ties to political elites, using state protection to shield their operations from scrutiny. Some actors are also involved in illicit markets such as gambling and cybercrime, leveraging political affiliations to operate with impunity.

Cambodia also hosts a range of loosely organized criminal networks engaged in drug trafficking, wildlife and mineral smuggling, cyber scam operations and human smuggling. These networks are adaptable and opportunistic. Emerging markets, such as cyber scam compounds and synthetic drug production and trafficking, enable existing networks to expand and new ones to develop. Criminal networks also rely on relationships with both state and foreign actors to



facilitate trafficking and fraud schemes. Their operations are reliant on transnational collaboration and frequently involve foreign and state-embedded actors.

State-embedded actors in Cambodia are deeply involved in the country's criminal ecosystem. Corruption enables a range of criminal markets, including timber trafficking, cybercrime, financial fraud and land grabs. Senior officials maintain close alliances with criminal networks, using their influence to avoid prosecution and facilitate illegal activities. Within the ruling party, extensive patronage networks incentivize lower-ranking individuals to participate in criminal activities to 'pay' their higher-ups and maintain these connections. Uniformed officers often provide security for cyber scam compounds and prevent victims from escaping. These abuses occur across all levels of the state.

Foreign criminal actors play a notable role in Cambodia's organized crime landscape. Chinese-speaking groups are heavily involved in human trafficking, drug production and cyber scams. These groups have formed alliances with those that control territory in Cambodia, allowing

them to expand their operations globally. Their networks are often structured and hierarchical, with roles ranging from top-level financiers to trafficked individuals forced to participate in cyber scam operations. Their operations are characterized by violence, coercion and sophisticated financial tactics, including money laundering through casinos, front companies and shell corporations.

Private-sector entities in Cambodia both facilitate and enable organized crime. Prominent businessmen hold government-issued concessions in forestry and mining, which are used to launder illegally sourced timber and gold. Payment platforms play a key role in processing transactions for scam operations. Despite international scrutiny, these businesses continue to operate publicly, reflecting the level of protection they receive from influential actors. Additionally, facilities such as hotels, brick kilns and entertainment venues are used for trafficking and forced labour. Some illegally registered private recruitment agencies have been implicated in the exploitation of Cambodian workers abroad, highlighting gaps in oversight and accountability.

# **RESILIENCE**

#### **LEADERSHIP AND GOVERNANCE**

Cambodia's political leadership and governance are marked by systemic weaknesses, including entrenched corruption, limited transparency and a fragile rule of law. Political centralization and the suppression of dissent have contributed to a stable environment for illicit actors to operate. The ruling party's long-standing dominance has allowed criminal groups to maintain established connections within state structures, reducing the likelihood of disruption due to political change. Although the government has launched public initiatives to combat cybercrime and environmental offences, these efforts are largely regarded as symbolic. Public crackdowns have had little effect on entrenched criminal operations and have rarely resulted in accountability for key actors.

Government transparency and accountability remain weak. While the release of budgetary documents marks some progress, the lack of detailed audit reports and the failure to disclose natural resource contracts point to persistent opacity. Anti-corruption institutions exist but are seen as ineffective, with international observers noting their limited enforcement capacity. Political affiliations and financial entanglements between criminal groups and government figures have also obstructed meaningful reform and eroded public trust.

Cambodia maintains cooperative engagements with regional and international partners. It has ratified major transnational crime conventions and engages in joint operations – particularly with China – to combat cybercrime, human trafficking and cyber scam operations. Cambodia is also a member of the Asia-Pacific Anti-Corruption Initiative and collaborates with neighbouring countries to address drug and arms trafficking. However, tensions with some regional partners persist, and gaps remain in effective implementation.

National legislation covers a wide range of criminal offences, including drug and human trafficking, wildlife crimes, organized crime and money laundering. While the legal framework exists, its effectiveness remains questionable. Recent efforts at both national and local levels have sought to develop policy responses to curb cyber-enabled exploitation, trafficking and narcotics-related offences. However, enforcement of these legal provisions is frequently undermined by systemic weaknesses within the law enforcement and judicial sectors.

#### **CRIMINAL JUSTICE AND SECURITY**

Cambodia's judicial system faces significant challenges. It is widely criticized for its lack of independence, corruption and failure to prosecute actors involved in organized crime. Most cases are resolved outside the court system due to



slow and incompetent judicial processes. Certain criminal elements have reportedly continued their operations from within detention facilities, highlighting the lack of oversight and accountability in the prison system. Prisons are overcrowded and plagued by poor conditions, with reports of abuse, extortion and arbitrary detention. Instances of forced labour and exploitation further reflect systemic failures.

Law enforcement is similarly hindered by corruption and a pervasive patronage culture. Although specialized units exist – including those targeting economic crimes and counterfeit goods – their effectiveness is undermined by bribery, political interference and limited operational capacity. Law enforcement personnel have been implicated in protecting illicit operations, including scam compounds and trafficking networks. Some have been accused of extorting victims and returning them to criminal groups. Recent administrative changes in law enforcement structures have yet to produce substantive change.

Cambodia's territorial integrity remains vulnerable due to porous borders and weak oversight. The country is a major transit point for regional drug trafficking, human smuggling, environmental crimes and the counterfeit goods trade. Border enforcement is hampered by limited institutional capacity and alleged collusion between officials and traffickers. Special Economic Zones – particularly those with foreign investment – are often seen as operating outside the control of local authorities, enabling organized criminal activity. While cross-border cooperation with regional partners has improved in recent years, enforcement gaps continue to be exploited by transnational criminal networks.

#### **ECONOMIC AND FINANCIAL ENVIRONMENT**

Cambodia's anti-money laundering framework faces persistent challenges. While the country has made progress in aligning with international standards – as evidenced by its removal from the Financial Action Task Force's Grey List in February 2023 after being listed since 2019 – practical enforcement remains weak. Financial intelligence units are under-resourced and prosecutions for financial crimes are rare. The widespread use of cash, dollarization of the economy and limited oversight make Cambodia an attractive destination for laundering illicit funds. Known criminal actors continue to operate openly, particularly in sectors such as real estate, casinos and digital payment systems.

The broader economic regulatory environment is marked by weak governance and minimal transparency. High levels of corruption, tax evasion and property rights abuses undermine investor confidence and regulatory effectiveness. Regulatory loopholes allow criminal actors to acquire multiple land concessions and launder natural resources. While Cambodia has enacted investment and competition laws and implemented some social welfare initiatives, it has struggled to enforce environmental protections or

regulate private-sector activities linked to organized crime. Land disputes, especially in areas targeted for real estate development, remain a major source of conflict and abuse.

#### **CIVIL SOCIETY AND SOCIAL PROTECTION**

Victim and witness support in Cambodia remains insufficient. The government relies heavily on civil society organizations to provide essential services to victims of human trafficking, cyber scams and other forms of exploitation. Government protocols for handling victims are often inconsistently applied, and some victims face detention or re-victimization. Observers have documented mistreatment and criminalization of individuals rescued from trafficking, particularly those from cyber scam compounds. Victims are sometimes held in overcrowded centres, required to buy their own food and kept near their traffickers before deportation. While police occasionally refer victims to NGOs, the Ministry of Social Affairs, Veterans and Youth Rehabilitation depends heavily on these organizations for financial and material support. Government systems lack the capacity and infrastructure to provide comprehensive care or identify trafficking victims. In response, NGOs offer temporary shelter, healthcare, psychosocial support and reintegration services. Regarding drug use, recent legislation has established a national roadmap to integrate substance abuse care, mental health services and community reintegration, though the latter has not yet been evaluated. Holistic drug programmes, including needle and syringe exchange, voluntary detoxification and counselling, are available through NGOs.

Prevention efforts have been hindered by limited political will and weak institutional capacity. Although some frameworks exist to combat corruption and trafficking – such as whistle-blower pathways and anti-corruption campaigns – enforcement is inconsistent. Community-based policing is present in rural areas, but in many locations, law enforcement is basic and influenced by patronage. The absence of a coherent national strategy on organized crime prevention and the lack of strong whistle-blower protections further weaken the prevention environment.

Non-state actors, particularly local civil society organizations and the media, play a critical role but are severely constrained. Press freedom and freedom of expression have deteriorated, with independent media outlets and activists subject to harassment, surveillance and legal threats. Journalists covering organized crime or environmental issues are particularly vulnerable. Many local NGOs and civil society groups operate under the threat of closure or retaliation, leading to self-censorship and diminished public engagement. Environmental defenders and community organizations – especially those opposing illegal logging and land grabs – have been systematically targeted. Despite these challenges,



some actors continue to document and resist criminal activities, often at significant personal risk.

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