



LEGAL BRIEF

Law on Civil Aviation of the Kingdom of Cambodia

On 20 January 2026, the King promulgated Law No. NS/RKM/0126/001 on Civil Aviation of the Kingdom of Cambodia, amending Law No. NS/RKM/0108/003 on Civil Aviation of the Kingdom of Cambodia dated 19 January 2008. The Law aims to promote and regulate civil aviation operations in the Kingdom of Cambodia by enhancing aviation safety, security, and order of civil aviation operations; promoting the development of air transport in a sustainable, investment-conductive, and competitive manner; contributing to environmental protection and enhancing the reasonable interests of users of air transport services.



Techo International Airport – Phnom, Cambodia

1. Introduction

On 20 January 2026, the King promulgated Law No. NS/RKM/0126/001 on Civil Aviation of the Kingdom of Cambodia, amending Law No. NS/RKM/0108/003 on Civil Aviation of the Kingdom of Cambodia dated 19 January 2008. The Law aims to promote and regulate civil aviation operations in the Kingdom of Cambodia by enhancing aviation safety, security, and order of civil aviation operations; promoting the development of air transport in a sustainable, investment-conductive, and competitive manner; contributing to environmental protection and enhancing the reasonable interests of users of air transport services.

This law governs all civil aviation operations, including aircraft and aircraft operators, aerodromes and air navigation services, aviation personnel, maintenance organisations, training institutions, air transport services, aviation-related and ancillary services, and holders of Cambodian aviation documents, both inside and outside Cambodia. However, this law shall not apply to state aircraft, except where they conduct civil aviation operations under the State Secretariat of Civil Aviation oversight. Cambodia retains complete sovereignty over its national airspace.

2. Authority of the State Secretariat of Civil Aviation

The State Secretariat of Civil Aviation (“**SSCA**”) is the competent authority responsible for overseeing and regulating civil aviation operations including technical requirements; safety and security compliance; aircraft registration, certification, licensing, and air navigation; issuing aviation regulations and technical requirements; entering into or recognizing Article 83 bis arrangements (referred to in Article 83 bis of the Chicago Convention); appoint and assign competent officers to supervise civil aviation activities and to cooperate with relevant national and international authorities as necessary.

The SSCA is empowered to promulgate Civil Aviation Technical Regulations in accordance with technological developments, technical requirements and international aviation standards, covering areas such as personnel licensing, aircraft operations, aircraft registration and airworthiness, air navigation services, aerodromes, aviation safety and security, transport of dangerous goods, environmental protection, and civil aviation

economics. The Civil Aviation Technical Regulation shall be promulgated by Prakas of the Minister in charge of the State Secretariat of Civil Aviation.

The SSCA shall implement and enforce civil aviation policies and regulations in accordance with applicable international laws, standards, and obligations. However, in exceptional circumstances involving humanitarian concerns, emergencies, or matters of public interest, exemptions may be granted subject to the prior approval of the Royal Government of Cambodia.

3. Civil Aviation Inspection

Civil Aviation Inspectors appointed by the SSCA may conduct inspections, audits, and surveillance of aviation operators, personnel, aircraft, and facilities. They may access aircraft, aviation facilities, records, and other relevant documents. Inspectors with judicial police status may search, seize evidence, detain suspects, and impose interim penalties. In addition, they may prohibit or restrict operations and detain aircraft or aeronautical products where necessary.

4. Civil Aviation Security

Aviation security measures must comply with applicable security laws and international conventions. The SSCA may issue aviation security directives and require the screening of passengers, baggage, cargo, and aircraft. Airport security officers or other competent officers may prohibit a person from travelling on board an aircraft where there are reasonable grounds to suspect that the person intends to commit an offence and may question individuals regarding baggage, cargo, or supplies intended for transport by air.

Furthermore, access to restricted airport areas is limited to authorised persons, and unauthorised entry into or presence in such areas is prohibited. Any person who has been denied transportation under a security directive may file a complaint with the Minister responsible for the SSCA and subsequently appeal to a competent court.

5. Search And Rescue

The SSCA is responsible for establishing, maintaining, and providing 24/7 search and rescue services for aircraft that are missing or in distress within Cambodia and in other areas for which Cambodia has accepted responsibility under regional air navigation agreements. These services are provided through a Rescue Coordination Centre operated by trained and qualified personnel. The SSCA may cooperate with domestic authorities, foreign States, international organisations, and public or private entities in carrying out search and rescue operations. Aircraft owners and operators may be required to reimburse the costs of search and rescue operations and the removal or disposal of wreckage.

6. Liability of Civil Aviation Officers and Competent Authorities

Civil Aviation Inspectors and other competent officials are required to perform their duties in compliance with the Law and applicable regulations. Any violation committed in the exercise of their functions may result in administrative disciplinary measures. Where the violation also constitutes a criminal offence or causes damage to another person, the responsible official may additionally be subject to criminal prosecution and/or civil liability in accordance with the applicable laws of the Kingdom of Cambodia.

LEGAL FRAMEWORK

7. Aircraft

Aircraft operating in, entering, departing from, or transiting Cambodia must comply with all applicable Cambodian laws, regulations, and civil aviation requirements. The following requirements shall apply to all such aircraft:

- Aircraft must be duly registered and display nationality and registration marks;
- Aircraft registered in Cambodia acquire Cambodian nationality and cannot be simultaneously registered in another State;
- Ownership rights and interests in registered aircraft must be recorded in the national recording system;
- Aircraft must hold a valid Certificate of Airworthiness;

- Cambodia may recognise foreign Certificates of Airworthiness that meet International Civil Aviation Organization (“ICAO”) standards;
- Aircraft must be equipped with licensed aeronautical radio equipment;
- Aircraft must maintain a Journey Logbook; and
- Aircraft must carry the required documents, including a registration certificate, airworthiness certificate, crew licenses, radio license, journey logbook, flight operations manual, passenger and/or cargo manifests, and insurance certificate.

In addition, aircraft subject to the Article 83 bis agreement must comply with the applicable operational, airworthiness, personnel licensing, and safety oversight responsibilities assigned under the agreement as recognised and implemented by the SSCA.

8. Personnel

Civil aviation personnel, including air traffic controllers, flight crew, cabin crew, mechanics, and ground handling service specialists, must hold valid licenses or certificates recognised by the SSCA and meet the following requirements:

- Operators must ensure personnel meet the prescribed qualification standards;
- Crew members must not exercise privileges beyond the limitations of their licenses;
- Flight crew must hold valid medical certificates; and
- Aircraft operators must appoint a qualified Aircraft Commander for each flight.

Furthermore, Operators, Aircraft Commanders, aerodrome operators, air traffic service providers, and aviation personnel must comply with mandatory reporting obligations regarding violations, accidents, and incidents.

9. Aircraft Operations and Air Navigation

Aircraft commanders, aircraft operators, and air navigation service providers must comply with the Rules of the Air, air traffic control instructions, and other applicable requirements issued by the SSCA. Aircraft must operate on designated routes, avoid prohibited, restricted, and danger areas, and comply with applicable national and international rules of the air. The SSCA is responsible for establishing and maintaining air navigation facilities and providing air navigation services within Cambodian-controlled airspace and may perform these functions directly or through authorised public or private entities. Aircraft commanders, aircraft operators, and air navigation service providers must meet the following requirements:

- Cambodian-registered aircraft operating abroad must comply with the Rules of the Air of the State being overflown and with ICAO Rules of the Air over the high seas;
- Air navigation facilities and services must comply with the Civil Aviation Technical Regulations and the standards of the Chicago Convention; and
- Aircraft must comply with lawful landing orders issued by the relevant authorities in coordination with the SSCA.

10. Aerodromes

Aerodromes may generally be owned only by the Royal Government or persons of Khmer nationality, unless the Royal Government determines otherwise. The SSCA may classify aerodromes and designate them as international or domestic aerodromes. International aerodromes are established by Sub-Decree, while domestic aerodromes are established by Prakas of the Minister in charge of the State Secretariat of Civil Aviation.

The operation, management, expansion, or use of land as an aerodrome requires a licence or certificate issued by the SSCA. The SSCA may amend, suspend, or revoke an aerodrome licence or certificate for safety, security, or other prescribed reasons and is responsible for regulating aerodrome plans, programmes, service charges, ground handling services, and other ancillary services.

11. Unmanned Aircraft and Aerial Work

The operation of unmanned aircraft requires prior authorisation from the SSCA. Aerial photography, image capture, video recording, and the transmission of images or videos from unmanned aircraft are also subject to

SSCA authorisation. In addition, no person may conduct aerial work activities or operate an aerial work business without authorisation from the SSCA and compliance with the applicable Civil Aviation Technical Regulations.

12. Civil Aviation Training Institutions

Civil aviation training institutions may be established by the SSCA or through authorised private investment. Flight training schools, flight simulators, and aircraft maintenance training schools must obtain the required certification before commencing operations. The SSCA may also issue certificates or recognise certificates issued by other Contracting States for civil aviation training institutions in accordance with applicable laws and regulations.

13. Aircraft Manufacture and Approved Maintenance Organisations

Aircraft manufacturing, modification, repair, overhaul, and maintenance organisations must obtain the required certification to operate. The SSCA may oversee and classify maintenance organisations based on the adequacy of their facilities, infrastructure, maintenance capabilities, and personnel competencies. The SSCA may also issue certificates or recognise certificates issued by other Contracting States for aircraft maintenance organisations in accordance with applicable Civil Aviation Technical Regulations.

14. Air Transport Operations

Air transport enterprises must hold a valid Air Operator Certificate (“**AOC**”) issued or recognised by the SSCA. The SSCA regulates air transport and ancillary services, including competition, traffic rights, slot allocation, consumer protection, and the resolution of disputes relating to air transport services, and may authorise domestic and international air transport operations in accordance with applicable laws, international conventions, and bilateral or multilateral agreements. Air transport service charges must be publicly disclosed and applied in a transparent and non-discriminatory manner.

Furthermore, air transport enterprises are required to ensure that flight operations and aircraft maintenance are conducted in compliance with the Law, Civil Aviation Technical Regulations, and AOC conditions, and must give priority to the employment of suitably qualified Cambodian nationals. The SSCA may amend, suspend, or revoke an AOC for non-compliance with applicable regulations or certificate conditions.

15. Dangerous Goods

An operator intending to transport dangerous goods by air, including explosives, flammable materials, toxic substances, radioactive materials, gases, corrosives, and other high-risk substances, must submit an application to the SSCA in accordance with applicable regulations. The SSCA, together with the relevant ministries and institutions, may approve the application, impose additional conditions, or refuse the application. If refused or subject to additional conditions, the applicant must be notified in writing of the reasons by the SSCA.

16. Liability And Insurance

Liability for international carriage by air is governed by the Montreal Convention 1999 and other applicable international treaties or conventions to which Cambodia is a party. For domestic air carriage not covered by such international instruments, air transport enterprises are required to compensate passengers for death or bodily injury, as well as for the destruction, loss, or damage of baggage and cargo, and for damage caused by delays in the carriage of passengers, baggage, or cargo, subject to the conditions prescribed by law. Moreover, air transport enterprises must also maintain insurance coverage for liability to third parties and for damage to passengers, baggage, and cargo carried by them.

17. Environmental And Aerodrome Safety Protection

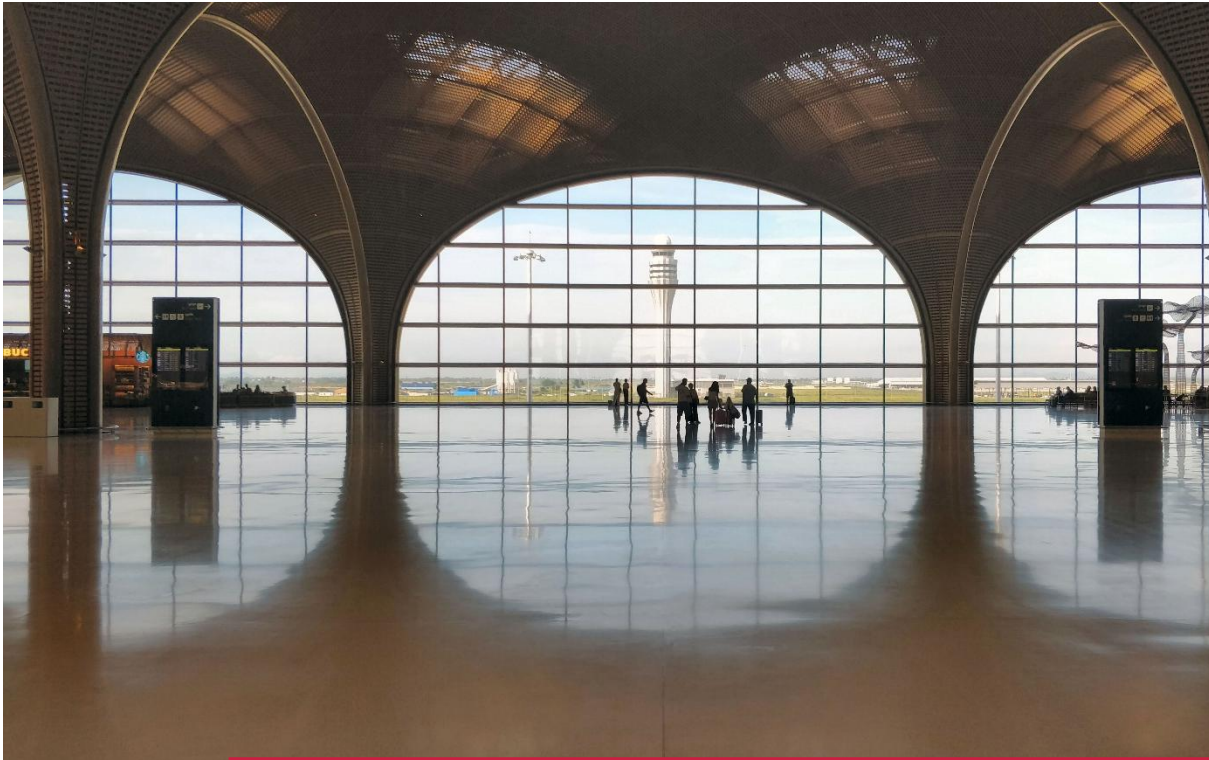
Aviation activities must comply with environmental standards relating to aircraft noise, waste management, emissions, and carbon reporting. Aircraft operators are required to report carbon emissions from international operations, and Cambodia implements the Carbon Offsetting and Reduction Scheme for International Aviation (“**CORSIA**”). Aerodrome projects must have environmental management plans, environmental management systems, and environmental impact assessments in place. In addition, wildlife hazard management plans and wildlife hazard risk assessments are required to support aviation safety and environmental compliance.

Additionally, the SSCA may establish obstacle limitation surfaces, height restrictions, and controlled areas around aerodromes to ensure aviation safety. Construction, lighting, reflective devices, vegetation, and

activities or installations that attract wildlife may be prohibited, restricted, or regulated within such areas. Property owners may be required to remove, modify, or reduce obstacles that pose a risk to aircraft operations or air navigation. Compensation may be available for the lawful removal, modification, or reduction of property in accordance with applicable laws and regulations.

18. Penalty Provisions

The Law provides for both administrative and criminal penalties for violations of civil aviation requirements. Administrative penalties may include written warnings, suspension of aviation activities, re-examination or retraining requirements, and the suspension or revocation of licences and certificates. In addition, criminal penalties may include monetary fines ranging from KHR 1 million to KHR 2 billion and imprisonment ranging from one month to life imprisonment.



Techo International Airport's Transit Area – Phnom Penh, Cambodia

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Kinstellar Southeast Asia (Cambodia) in association with Sok Siphana Sethalay was born from the recent combination of SokSiphana & Associates' and Sethalay Law Office's expertise and resources. As one of Cambodia's leading law firms, we offer comprehensive corporate and commercial legal services to a wide-ranging clientele – from multinational corporations to fast-growing local businesses.

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