

2013

Food Safety Control Measures

Country Report for Cambodia



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List of acronyms

ADB	Asian Development Bank
ACCSQ	ASEAN Consultative Committee on Standards and Quality
ASEAN	Association of South-East Asian Nations
CAC	Consumers Association of Cambodia
CI	Consumers International
CIRRD	Cambodian Institute for Research and Rural Development
CNCC	Cambodia National Codex Committee
CSO	Civil Society Organisation
EU	European Union
FAO	Food and Agriculture Organization
GAP	Good agricultural practices
GDP	Gross Domestic Product
GHP	Good handling practice
GIZ	Deutsche Gesellschaft für Internationale Zusammenarbeit
GMOs	Genetically modified organisms
GMP	Good manufacturing practice
HACCP	Hazard analysis critical control point
HDI	Human Development Index
HPLC	High-performance liquid chromatography
ICT	Information communication technology
IEC	International Electrotechnical Commission
IMC	Inter-ministerial committee
IPM	Integrated pest management
ISC	Institute of Standards of Cambodia
ISO	International Organization for Standardization
ILCC	Industrial Laboratory Centre of Cambodia
KII	Key informant interviews
LDC	Least-developed country
LMQSPS	Law on the Management of Quality and Safety of Products and Services
LMO	Living modified organisms
MAFF	Ministry of Agriculture, Forestry and Fisheries (MAFF)
MIME	Ministry of Industry, Mines and Energy
MoC	Ministry of Commerce
MoE	Ministry of Environment
MoEF	Ministry of the Economy and Finance
MCPD	Monochloropropane
MoH	Ministry of Health
MoT	Ministry of Tourism
NAL	National Agriculture Laboratory
NVRI	National Veterinary Research Institute

NGO	Non-governmental organisation
NSDP	National Strategic Development Plan
RCP	Recommended codes of practice
RTD	Roundtable discussion
STDF	Standards and Trade Development Facility
SME	Small and medium-sized enterprise
SPS	Sanitary and phytosanitary
UN	United Nations
UNDP	United Nations Development Programme
UNIDO	United Nations Industrial Development Organisation
VAT	Value-added tax
WHO	World Health Organization
WTO	World Trade Organization

Executive summary

Consumers International has carried out primary and secondary research on food safety control measures in Cambodia looking at the overall legal framework, institutions, measures and human resources, as well as the gaps occurring in these areas. This report is the result of the research that focused on the Cambodian experience – food safety control measures and complexities perceived by consumers. It highlights the challenges that Cambodia is facing, particularly in terms of import and export control systems. It provides priority-based recommendations stressing the importance of carrying out a long-term technical assistance programme for Cambodia to improve food safety so that it matches up with that existing in other ASEAN countries. The research indicates that food safety control measures in Cambodia still need to be systematically developed. Food safety practices are not well observed in markets, products are not properly labelled and the very few existing product standards are widely ignored by producers. There is a large implementation and enforcement gap in Cambodia. An enabling environment in terms of the legal framework, infrastructure and skilled human resources of relevant organisations is needed for the effective implementation of FSCMs. The scope needs to be clearly defined with the agencies responsible for enforcing these measures. The existing infrastructure needs to be upgraded in terms of qualified/trained staff and laboratory equipment as well as in terms of quality, i.e. technical assistance to be able to cover the whole control system. This research identified different needs for addressing the above capacity gaps, and highlights the following recommendations to improve food safety control measures:

- Develop food safety standards by adopting applicable regional and international standards
- Implement technical food regulations and set targets for enforcement by responsible agencies
- Develop the capacity of laboratories at national borders to perform inspections, monitoring and surveillance of imported food
- Adopt Codex standards and participate in Codex meetings on food safety, ASEAN meetings and other regional meetings, such as that of the ISO, in order to strengthen the country's export certification system
- Develop food safety indicators based on the ASEAN Food Safety Indicators
- Streamline coordination between authorities responsible for food safety control
- Train staff to implement and enforce food control measures (qualified and certified food inspectors and laboratory technicians)
- Improve the capacity of existing food testing laboratories and investigate the possibility of integrating all laboratories
- Implement food safety best practices such as labelling, packaging, details, safety and quality level by emulating those from other ASEAN countries

Based on the above recommendations, effort is required to streamline food safety control measures that are consistent with existing regional and global trends.

1.

Food safety and consumer protection in Cambodia

1.1 Food safety concerns and consumer protection in Cambodia

Primary and secondary research conducted in Cambodia indicates that people are concerned about the safety of meat being sold at Phnom Penh markets, i.e. that it has not been inspected and may be the product of an illegal slaughtering operation. There are also concerns about the movement of animals through Cambodian border checkpoints. Common consumer concerns in Cambodia relating to food safety are:

- pesticide residues in vegetables that remain on or in food after being applied to food crops
- the use of formalin in fish, shrimp, meat and fruit
- the use of ripening agents, namely calcium carbide, for artificially ripening mangoes, bananas, papayas, and sometimes apples and plums
- arsenic contamination in brown rice, water and fish
- the use of sulphite in palm sugar
- the use of 3-MCPD in soy sauce
- non-food-grade colouring, such as industrial dyes, in foods
- the use of sulphuric acid to produce vinegar
- the use of methanol in alcohol, rice, cassava, tapioca, vinegar, wine etc.
- high levels of veterinary drugs in animals/meat (hormones)
- unsuitable packaging, sometimes resulting in chemical leaching

Cambodia at a glance:

Population: 15,135,000 (2013)

GDP: 7.2% in 2012

Per Capita Income: US\$1,000

HDI: 0.543 (2012) (ranked 138)

Poverty rate: 19.8% in 2011

Health Expenditure: 7.5% of GDP (2013)

(Central Intelligence Agency, The World Fact Book 2013; WHO 2013; UNDP 2013).

The project found that food-borne illnesses are contributing to the country's low life expectancy. The most common of these are due to food poisoning, where a food causes a toxic reaction. Deaths from diarrhoea regularly occur in very poor, remote areas of the country. The secondary research indicates that drinking water supplies and sanitation are very poor in Cambodia. Many Cambodian people live without clean water and hygienic sanitation, and this has caused water-borne and communicable diseases to become prevalent. In Cambodia, diarrhoeal diseases are a major problem as they result in high levels of nutrient wastage, and there is a multiplicity of inappropriate beliefs and practices surrounding food use issues in the country.

1.2 Consumer protection against unsafe food in Cambodia

The secondary research shows that consumer protection in Cambodia is provided for in several laws and regulations. There is no specific, comprehensive law that covers the full scope of consumer protection in Cambodia. The Constitution specifies in Article 64 that 'the State shall ban and severely punish those who import, manufacture or sell illicit drugs and counterfeit and expired goods which affect the health and life of the consumer'. The Law on the Management of Quality and Safety of Products and Services (LMQSPS) of 21 June 2000 also provides a legal framework for consumer protection in terms of public health, safety, fraud and deception, including false advertising, for the products and services offered in the country.

Regarding consumer awareness, there is a wide disparity between rural and urban consumers. The issues of pesticides and health risks are not taken up by the Cambodian media, and there is also a lack of civil society organisations working on general awareness campaigns. For many people, it is not that they are not concerned; it is simply that they are often unaware. Significant advancements have, however, been made in Cambodia in other sectors, but consumer protection has only begun receiving attention during the last decade. Consumers in urban areas, particularly in Phnom Penh, have become increasingly concerned about food safety issues. However, as is the case with food retailers, they also demand low-cost food products. Overall, the concept of consumer protection is gaining in importance and moving higher up the public policy agenda. The primary research shows that dedicated local consumer organisations are lacking.



Food being sold in an open market

Some of the direct and indirect violations relating to food most commonly observed in Cambodia illustrate the following:

- Labelling requirements are not commonly observed, with both imported and domestic products frequently sold without labels written in Khmer, contrary to Article 3 of the LMQSPS, or well past their expiry dates, contrary to Article 1 of the Prakas (Ministerial Proclamation on Product Expiry Dates). It has been shown that consumers trust a product more if it comes without labelling in Khmer. This is because Khmer-labelled, and

therefore presumably local, products are assumed by consumers to be of a lower quality than products labelled in other languages, particularly English, which are presumed to be imported and therefore of a higher quality.

- The use of modern agricultural methods, and especially of poor-quality pesticides, poses severe health risks for farm workers and those exposed to spray drifts, as well as through toxic residues which accumulate in food and drinking water. The hormones, veterinary drugs and antibiotics given to animals to treat illness or promote growth leave residues in foods that finish up on consumers' plates. In addition, unhygienic practices in food production, processing, transport and storage frequently lead to outbreaks of food-borne illness.
- Deficiencies have been observed with regard to pricing information, required by Article 51 of the Law on Commercial Regulations and Commercial Register. Prices are usually displayed in middle-class urban shops and supermarkets, but at the wet markets and open-air markets where most Cambodians shop this is rarely the case, and prices are instead established through haggling between customer and vendor. Moreover, on the rare occasion that a price is displayed, it will nearly always be shown in US dollars, which is the unofficial currency of choice in Cambodia.

The research indicates that there is no dedicated local consumer organisation in Cambodia. Considering the complexity of consumer protection issues, particularly relating to food safety, a consumer organisation could play an effective role in consolidating consumer interest in food safety control by monitoring compliance with standards and advocating for change on behalf of consumers. Addressing this issue would, in turn, catalyse many of the other improvements required in the Cambodian economy. Most importantly, consumer participation would ensure that government and industries work together with the best interests of consumers in mind.

2.

Food safety in the food and agricultural trade

2.1 Food safety compliance

As a member of ASEAN and WTO, Cambodia has adopted a number of measures to ensure food safety for consumers. Several regulations have been developed, for example regarding the registration of industrial products, standards for food product labelling, general standards for a model third-party certification system for products, as well as quality control and the safety of food. In 1993, when these regulations were being established, a framework law was implemented to manage and control the quality and safety of food products, goods and services, empowering inspection agents from the Ministry of Commerce to take action against market violations. The Ministry of Health is involved in drafting food law, and a number of sub-decrees have been established addressing food safety and good manufacturing practices (GMP), such as industry standards, food hygiene for human consumption, phytosanitary inspections, animal health and inspections of products derived from animal production, as well as agricultural materials standards.

The Cambodian National Codex Committee (CNCC) was established by sub-decree and consists of eight members. The CNCC is concerned with matters relating to policy on the safety and quality of products and services, consumer protection and fair trade and the coordination of the relevant ministries involved in food safety matters. The Codex contact point is located in the Department of Export Inspection and Fraud Repression under the Ministry of Commerce. As a member of the WTO, Cambodia has prepared an action plan for the implementation of the Sanitary and Phytosanitary (SPS) and Technical Barriers to Trade (TBT) agreements. Sub-decree No 12, adopted in February 2002, established the Department of Industrial Standards, which is tasked with ensuring the quality of product standards, including those for foods. An inter-ministerial committee convened by the Ministry of Commerce to deal with consumer protection coordinates inspections on the quality and safety of products and services. It is responsible for introducing ministerial orders, sub-decrees and other regulations on food hygiene, food labelling and packaging and on the chemical substances banned for use in food products. Currently, the relevant ministries are addressing food standards by adopting and/or adapting standards from the Codex Alimentarius.

2.2 Food import control system

Cambodia has pursued an open economy policy since the 1990s, creating opportunities for accessing technology and overseas markets. Consequently, trade measured as a share of GDP moved from a deficit of 50% in 1993 to a deficit of 12% in 2011. Current exports from Cambodia, such as agriculture, mining, manufacturing, services etc. have contributed to the nation's current account balance, but have been of insufficient value to meet the cost

of imports. However, due to a sustained inflow of official development assistance, the fiscal balance remained positive, as in 2010.

As a member of ASEAN, Cambodia has acceded to 27 ASEAN agreements. Four specific conditions in these agreements cover food security, tariffs, services and investment. Under the agreement in the Common Effective Tariff Scheme (CETS) for the ASEAN Free Trade Area (AFTA), signed in 1992, Cambodia was given until 2009 to reduce tariffs to between 0% and 5% on goods on the inclusion list, and until 2017 to cut tariffs on sensitive agricultural products.

The food industry in Cambodia has the potential to expand its international sales by developing mass production with low input costs and high-quality output. SMEs, which make up approximately 95% of all enterprises and account for almost half of all employment, are the backbone of the Cambodian economy. The Government of Cambodia has emphasised the important role SMEs perform in economic growth and poverty reduction in its Second Socio-Economic Development Plan and its National Poverty Reduction Strategy.

According to the latest available statistics provided by the then Cambodian Ministry of Industry, Mines and Energy in 2006, 82% of SMEs operated in the beverage, food and tobacco sector. Considering that such a large proportion of the workforce is employed in the food and drink industries, its development is critical for pro-poor growth in Cambodia. The food processing industry in Cambodia is still at a developmental stage and is weighed down by several constraints and weaknesses, including the lack of processing facilities, food processing technology and skills, market analysis and marketing information, sanitation and hygiene knowledge; as well as a poor infrastructure, an unreliable supply of raw materials and the fact that its products often fail to be competitive due to high operating costs.

Requirements and procedures for importing food

The secondary research has indicated that informal trade across Cambodia's borders with neighbouring Thailand and Viet Nam has an influence on Cambodia's food supply, but distortions in the formal trade regime keep prices high in the domestic market. There are no quantitative restrictions on Cambodian imports, such as import licences or quotas, except on certain prohibited items such as military or paramilitary goods. However, the importation of technology, works of art, plants and animals, medicines and chemicals all require valid licences. Tariffs on goods consist of ad valorem duties, based on the value of goods when they arrive at customs, including insurance, freight and other duties and taxes. Table 1 summarises some general requirements imposed on imported food and agricultural products.

In addition, these goods are subject to a 10% value-added tax (VAT). Currently, food imports are subject to a 7% tariff, constituting the lowest category of a four-band import tariff system. Cambodia also restricts the exportation of rice, imposing a 10% tax on raw materials and 5% on processed products, including rice. The combination of tariffs and export taxes creates a higher effective rate of protection and a greater incentive to sell domestically due to the higher prices prevailing in the domestic market.

Informal cross-border trade between Cambodia and Thailand is reported to be thriving. Imports consist of food products including rice, fruit, vegetables and processed foods, as well as equipment such as kitchen utensils, bicycles and spare parts for water pumps, ploughs and hoes. The border provinces where this cross-border trade takes place are Battambang, Banteay Meanchey, Koh Kong and Pursat on the border with Thailand, and Prey Veng, Takéo, Kratié, Mondulkiri and Svay Rieng on the border with Vietnam. Table 2 highlights some major food imports and countries exporting to Cambodia.

The official and recognised border crossings where inspections on food and agricultural products being imported are carried out are:

- Sihanouk Ville in Preah Sihanouk Province
- Bavet in Svay Rieng Province
- Poipet in Banteay Meanchey Province
- Phnom Penh International Airport in Phnom Penh city

Table 1: General requirements and standards for Cambodian food and agricultural imports

Areas	Requirements
Import declaration	<ul style="list-style-type: none"> - All imported goods must be reported at a customs office or other location as determined by the Director of Customs. - The Minister of Economics and Finance may, according to Prakas, regulate the time, manner, documentation requirements, circumstances and exceptions with respect to the reporting of imported goods.
Import documents	<ul style="list-style-type: none"> - Cambodian customs requires importers and exporters to provide a bill of lading, packing list and invoice for all shipments
Registration	<ul style="list-style-type: none"> - No approval is required to import goods into Cambodia, providing the importer is registered with the Ministry of Commerce. - Only goods that are classified as prohibited or restricted for import require permission from the relevant ministries (live pigs and pig meat are prohibited by the Ministry of Agriculture). - All imported goods must be reported to the customs office. Companies are required to register at least 15 days prior to the commencement of commercial operations at the provincial or municipal commerce office, or other places as determined by the Ministry of Commerce.
Import licenses	<ul style="list-style-type: none"> - Import licences are required for agricultural imports, such as pesticides and fertilisers, and can be obtained from the Ministry of Agriculture, Forestry and Fisheries; artificial sweeteners, pharmaceuticals and medical materials can be obtained from the Ministry of Health.

Table 1: General requirements and standards for Cambodian food and agricultural imports (continued)

Certificate of Good Manufacturing Practice	- Required for imports of agricultural and pharmaceutical products, in accordance with WHO standards and guidelines
Health certificate	- Required for the import of live animals and animal by-products
Phytosanitary certificate	- Required for the import of certain agricultural goods, including fruit and vegetables, citrus and rose plants and seed, baled cotton and seeds and onion seed
Areas	Requirements
Standards	- Regulated by Industrial Standards of Cambodia CS001-2000 and required on the labelling of all pre-packaged foods
Language	- Khmer language - Additional foreign languages such as English, French, Chinese, etc. must be written in a smaller font than that used for the Khmer text.
Required information	- Name of product - Name, address of person(s) responsible for the products, including producer/s, packagers/wrappers and traders - Source/country of origin - Quantity, weight, volume, etc. - Lot numbers - Date of manufacture and expiry - Ingredients - Usage instructions, where applicable - Licence from the relevant authorities before product circulation; if required and for local products - Quantitative labelling of ingredients - Exemptions: spices and herbs, small units (where the largest surface area is less than 10 cm ²)

Reportedly, very few official exporters market rice due to the high entry costs and restrictions in place on rice exports. Storage, milling and transport costs are reported to account for 5-10% of the sales price. The level of resources required to enter the export market is also increased by the time-consuming procedures required to obtain export licenses. In the food export trade, research has indicated that the primary problem area is the unsanitary condition of fisheries and fish products, leading to the 2005 EU ban on Cambodian fisheries exports; other trade/SPS issues have included phytosanitary concerns regarding shipments of rice to China, due to the presence of weed seeds and nematodes, and the contamination of EU-bound spices like black pepper containing residues and growth promoters.

For this report, the research team visited the Bavet International Border in Svay Rieng Province to monitor the inspection of food imports. At Bavet, Camcontrol staff carry out:

- physical examination of food
- random sampling and testing
- basic tests such as formalin and borax tests
- health certificate examinations from the exporting country



*Bavet International Border in Svay
Rieng Province, Cambodia*

Table 2: Major food imports and countries exporting to Cambodia

Country	Food Products
Thailand	<ul style="list-style-type: none"> • fruit, vegetables and processed foods, including: • large quantities of processed foods – milk (powder and liquid), MSG, sugar, beer and branded instant noodles • smuggled processed foods – canned/bottled soft drinks, fruit, vegetables, processed meats, cooking oil, bakery items, candy, biscuits, instant noodles and spices
Viet Nam	Vegetables, fruits and meat products, including live animals Vegetable imports from Viet Nam supply almost 60% of Cambodia's demand for vegetables, with Cambodian production providing the remaining 40%.
Australia & New Zealand	Milk and milk products

3.

Cambodia’s food safety control systems

3.1 Food control management

The system of food control is complex, with significant control exercised by Camcontrol, the Cambodian Import-Export Inspection and Fraud Repression Directorate General of the Ministry of Commerce. Apart from Camcontrol, Ministry of Mines and Energy, Ministry of Agriculture, Forestry and Fisheries, Ministry of Health, Ministry of Tourism and Ministry of Economy and Finance are empowered with different responsibilities as listed in the table below:

Table 3: Food safety administration in Cambodia

Ministry	Responsibility
Ministry of Commerce (via Camcontrol)	Camcontrol ensures protection of consumers in general, dealing with food and non-food products and fraud. It protects against harm to human health from unsafe goods, as well as harm to people, property and the environment arising from general product issues. Camcontrol’s activities are focused on preventing the distribution of unsafe, poor quality, adulterated, misbranded or contaminated products, including food. Camcontrol’s officers inspect imported foods at the point of entry as well as foods for export. They also perform market monitoring throughout the country, being the Codex contact point.
Ministry of Mines and Energy (MME)	The Ministry of Mines and Energy (MME) is the authority conducting quality controls in manufactured and industrial products. They inspect samples of processed food and undertake microbiological and/or chemical analyses in laboratories of a range of products such as bottled water, beer, wine, fish, soy sauce and vinegar. Before issuing licenses, the result of the analytical testing must be satisfactory. However, as there are no national food standards from which to interpret results, the Codex standards are applied. A small number of national standards has been approved by the Industrial Standards Technical Committee.
Ministry of Agriculture, Forestry and Fisheries (MAFF)	The Ministry of Agriculture, Forestry and Fisheries (MAFF) plays a key role in managing and controlling the safety and quality of agricultural products (raw materials) as they enter the food chain. Inspections of phytosanitary issues, agricultural chemical residues, animal health and sanitation and agricultural material are carried out by MAFF officers. The Ministry operates nine checkpoints where it works to control the above-mentioned items and issues

Table 3: Food safety administration in Cambodia (continued)

Ministry	Responsibility
Ministry of Health (MoH)	The Ministry of Health (MoH) is responsible for all aspects of public health, including assuring the safety and wholesome nature of food offered for sale in Cambodia. The Department of Food and Drugs provides guidance in the creation of a fully integrated food control structure, involving all stakeholders in the food supply and food control chain. The Ministry of Health is the focal point of the Asian Expert on Food Safety.
Ministry of Tourism (MoT)	The Ministry of Tourism's main food safety role is to register, provide permits for and inspect food outlets, such as food courts and restaurants, in all of Cambodia's provinces, thereby ensuring that they comply with MoT standards.
Ministry of Economy and Finance	The General Department of Customs and Excise in the Ministry of Economy and Finance assumes the lead role in effectively facilitating and encouraging food safety inspections at international border checkpoints.



CI meeting with the food safety authorities in Phnom Penh

In addition to the above-mentioned responsibilities and, as mentioned in Section 2.1, the inter-ministerial committee and Cambodia National Codex Committee (CNCC) play a vital role in coordinating inspections of the quality and safety of products and services in Cambodia.

3.2 Legislative measures

The principal food safety law

The Inter-Ministerial Prakas (Prakas No. UATH.BRK 868) on the Implementation and Institutional Arrangements of Food Safety Based on the Farm to Table Approach (IMP868) of 22 October 2010. According to Article 1, this Prakas:

- aims to improve the implementation of the food safety system for the protection of consumer health and enhance Cambodian food export competitiveness;

- aims to set up institutional mechanisms for facilitating and coordinating activities from different ministries and competent authorities related to food safety;
- draws on key principles based on scientific principles, economic efficiency and effective trade facilitation for its institutional arrangements and its implementation by the ministries relevant to food safety matters.

The provisions of this Prakas (Article 2) cover food produced for commercial purposes and all related activities at all stages of the food chain, from primary production on farms to final consumer consumption. This excludes food produced for family consumption or recreational purposes, animal feed and living modified organisms (LMO).

In order to move towards building a food safety policy based on an integrated approach, the institutional arrangements laid down in this Prakas clarify the accountabilities and effective roles and responsibilities of ministries and competent authorities, particularly with respect to:

- policy development, legal framework, standards and technical regulation development
- regulation and enforcement of food safety, including food business registration and licensing, inspection and other legal enforcement actions
- verification and competent authority certification
- development and implementation of risk analyses and risk management systems
- data collection and scientific and technical research with the purpose of monitoring risk

Other legislation

Sub-decree No 54 of 22 September 97 on the Organisation and Functioning of the Ministry of Commerce

Under this sub-decree, the Ministry of Commerce assigns duties to the Cambodia Import-Export Inspection and Fraud Repression Directorate General (Camcontrol). Camcontrol's enforcement provisions are supported by the Law on the Management of Quality and Safety of Products and Services (LMQSPS). Under this law, besides other functions, Camcontrol sets food standards, specifications and labelling requirements, and controls the production and importation of products, including food products.

Sub-decree No 59 on Upgrading Cambodia Import-Export Inspection and Fraud Repression Department (Camcontrol) to Cambodia Import-Export Inspection and Fraud Repression Directorate-General (Camcontrol) under the Ministry of Commerce

This sub-decree sets out Camcontrol's responsibilities in more detail. Article 3 requires the Directorate General to :

- provide import-export inspection services with Customs and Excise based on the Trade Facilitation through Risk Management
- protect consumers, ensure quality, safety of products and repress fraud in collaboration with relevant agencies
- issue certificates of quantity for export goods upon request from applicants in order to fulfil importing country requirements

- check National Standard Conformity on the quality and safety of products which use the sign of the National Standard
- conduct cooperative pre-checks on declarations of products and services that may affect safety, consumers' health or production, trade in those products and services provided by competent authorities
- inspect products and services at the stage of circulating in markets
- manage the Laboratory Department of the Ministry of Commerce to diagnose the quality of products
- cater for commercial services
- collect import-export inspection fees and fees for the diagnosis of product quality;
- act as a secretariat for the National Codex Committee
- act as a contact point for receiving and disseminating Sanitary and Phytosanitary (SPS)
- act as a contact point for providing information on food safety under the framework of the ASEAN-China cooperation
- carry out other duties designated by the Ministry's leaders

The law covering product safety and labelling: LMQSPS

LMQSPS contains a number of detailed prescriptions on product safety and labelling. Articles 6 and 7 of LMQSPS prohibit the production or insertion into the stream of commerce of products, goods or services that might be detrimental to the health or safety of consumers when no prior disclosure has been made or no prior authorisation has been issued by the competent institutions following a proper inspection. Article 17 states that it is prohibited to falsify products used or kept for commercialisation by modifying the products through treatment or tampering such as adding, subtracting or substituting any part of or complete component. It is also prohibited to put into the stream of commerce products that are known to be not genuine. According to Articles 18 and 20, it is prohibited to put into the stream of commerce food products that are known to be contaminated or toxic or do not meet bacteriological or sanitary requirements, as well as products and instruments used for falsifying and counterfeiting products. Similarly, Chapter 6 of the law authorises the inspection of the quality and safety of goods and services and the analysis of product samples. Their quality and safety are to be compared against 'the requirements as prescribed by law', which are, for the most part, separately specified in regulations or 'Prakas'. Specific Prakas and sub-decrees on food and product safety include those covering:

- o vinegar (2003);
- o iodised salt (2003);
- o bottled drinking water (2005);
- o chilli sauce (2005);
- o chemicals prohibited for use in food (2006);
- o soy sauce (2007).

On labelling, the LMQSPS makes the following provisions:

- o Article 3 requires that vendors 'indicate on their products, goods, and services in

- o Khmer language the ingredients, composition, usage guidelines, manufacturing date and expiration date, along with other requirements that guarantee the health and safety of consumers and, in Article 4, provide ‘accurate information concerning their composition or configuration ... so as to prevent confusion by consumers or damage competition.’
- o Article 6 states that where goods or services can harm the health or safety of consumers, their manufacturing and commercialisation shall be subject to a prior submission of a declaration to the competent institutions, prior authorisation and an indication of usage guidelines in the Khmer language.
- o A quality mark may be used by manufacturers and service providers who comply with relevant quality and safety criteria as established in the sub-decree (Chapter 3 and Article 59).

The Law on Commercial Regulations and Commercial Register 1995 and its Amendment Law of 18 November 1999

This law and its amendment law require merchants ‘to display the rates and conditions of sale in force’ (Article 51) and to establish prices ‘in the national currency (Riels), except in cases where otherwise authorised by the Ministry of Commerce’.

The Law on Metrology

Article 33 of this law requires that information be provided on the quantity or weight of product and the name and address of the manufacturer, packer or the trademark.

Prakas No 329 (MoC/M99) on Measures against Food Products Devoid of Appropriate Packaging Labels (1999)

This Prakas prohibits the importation, circulation, sale or display for sale of products that lack appropriate trademarks or labels, or where such labels do not meet legal requirements (Article 1). Such goods may be seized and destroyed or shipped back to their point of origin (Article 3).

Prakas No 335 on Product Expiry Date

This Prakas requires both imported and locally produced food to display an expiry date (Article 1), for which sellers are to be accountable (Article 2). The customs department will issue an expiry date certificate for food products that are imported or exported (Article 3).

The Law on Geographical Indications

Yet to be implemented, this law will establish a system whereby a registered trademark can be applied to Cambodian products like agricultural goods, foodstuffs or handicraft goods indicating their geographical origin. Article 28 of the law prohibits the unauthorised use or ‘other false or misleading indication as to the provenance, origin, nature, or essential qualities of the goods’ or ‘other practices likely to mislead the public as to the true origin of the goods’. Article 42 provides for penalties ranging from KHR 1 million to

20 million (the latter being approximately US\$4,745), or from one to five year's imprisonment, or both.

Sub-decree No 67 of 22 October 1997

This sub-decree identifies the Ministry of Health (MoH) as responsible for controlling the safety and management of food. As a result, MoH placed 'food and cosmetics' under the then Department of Drugs and Medical Devices, creating the Department of Drugs and Food, which now handles food safety matters for MoH. Sub-decree No 67 clearly and unambiguously defines the duty of the Ministry of Health to control the safety (and wholesomeness) of the food supply.

Sub-decree No 64 of 29 July 2001

This sub-decree provides for the designation and management of border controls at the border gates, airports and seaports of the Kingdom of Cambodia.

Sub-decree No 47 Or Nor Kror.Bor Kor of 12 June 2003 on Food Hygiene for Human Beings

The Sub-Decree provides for rules regarding: food production buildings; premises where food products are prepared, treated or processed; means of transportation for food products; hygiene measures; equipment used for food production; management of solid and liquid waste and unclean water; water supply; staff hygiene; raw materials and ingredients for producing food; markets and distribution activities, etc.

Sub-decree on the Management of the Import of Live Animals and Meat Products

This sub-decree provides for the sanitary inspection of animals and animal products in order to prevent and control the outbreak or spread of diseases. The Department of Animal Health and Production under the Ministry of Agriculture, Forestry and Fisheries (MAFF) is thus required to establish inspection offices for animal health and products of animal origin. The rights and duties of these offices are outlined in the text. The sub-decree also sets out requirements for the transportation, import and export, etc. of animals or products of animal origin, specifies offences and determines penalties.

Sub-decree on Phytosanitary Inspection of 13 March 2003

The aim of this sub-decree is to prevent the introduction of dangerous pests into the territory and the spread of pests from one part of the territory to another within the country or to other countries by any means of transportation in order to protect agricultural production and biodiversity. The sub-decree further provides for: procedures and requirements for the transportation, import, export and transit of plant quarantine materials; phytosanitary inspection formalities; penalties; etc.

Sanitary Inspection of Animals and Animal Products of 29 July 1988

Inspections of animal health and products of animal origin are carried out in order to prevent outbreaks of animal-borne diseases and the circulation of infected products of animal origin from one region to another within the country or exported to a foreign coun-

try, and to prevent the transmission of such disease by any means of transport in order to protect animals and products of animal origin.

Sub-decree No 12 of 11 February 2002

This sub-decree established the Department of Industrial Standards of Cambodia, which is in charge of developing national standards to improve the quality of local products, including food.

Biosafety measures (regulations on biotechnology or GMOs)

Cambodia still needs to develop policies on biotechnology/biosafety. However, the Government recognises biotechnologies as part of the strategic triangle for developing the country's economic growth, social development and sustainability. Cambodia is not capable of developing any GMOs in the near future, but will most likely be a user of GM products. The competent national agency responsible for these issues is the National Biodiversity Steering Committee (NBSC), under the Ministry of Environment.

3.3 National food standards

Wherever relevant to the country's situation (import and domestic), Cambodia employs Codex standards regarding technical regulations for food. The standards are classified as:

- general standards
- commodities standards
- guidelines/recommended codes of practice (RCP)

The three levels of standards are:

- integral adoption as a technical regulation
- certain standards adopted as safety or technical requirements for food
- certain guidelines/RCP used as reference material for the regulation being endorsed as approved practice

The Institute of Standards of Cambodia (ISC) is the agency responsible for developing standards and quality assurance in Cambodia. During its field visit to Cambodia, CI had the opportunity to meet officials from the Institute and, in their discussions, they broached the Law on Standards of Cambodia of 24 June 2007, which has the following purposes (Article 2):

- to improve the quality of products, services and management



Office of the Institute of Standards of Cambodia

- to raise and rationalise production efficiency
- to ensure fair and simplified trade
- to rationalise product use
- to enhance consumer protection and public welfare

The scope of this Law covers all activities related to standardisation, quality assurance and related activities within the whole territory of Cambodia (Article 1).

The Institute of Standards of Cambodia (ISC):

ISC is a subscriber member of the International Organization for Standardization (ISO), an affiliate member of the International Electrotechnical Commission (IEC) and a member of the ASEAN Consultative Committee on Standards and Quality (ACCSQ). With the accession of Cambodia to the World Trade Organisation (WTO) in October 2004, ISC operates as a WTO/TBT (Technical Barriers to Trade) enquiry point and acts as a notification authority. Currently, there are 55 Cambodian standards, mainly in the fields of food, electrical appliances and tools.

In addition to ISC, there is the National Standards Council which consists of 21 members from different ministries, universities, consumer associations and producer associations. The National Standards Council is tasked with, among other things:

- approving, amending and cancelling any national standards
- approving, amending and cancelling any standard trademarks
- determining voluntary or mandatory standards or standard trademarks
- advising the minister with regard to standardisation priorities and policies, programmes, planning, projects and activities to ensure maximum effectiveness

3.4 Inspection and enforcement

The secondary data shows that the Ministry of Commerce and Ministry of Mines and Energy (MME) exercise significant control in this area. Camcontrol's officers inspect imported foods at the point of entry as well as foods for export. The inspectors also perform market monitoring throughout the country. Camcontrol's activities are mainly focused on preventing the distribution of unsafe, poor quality, adulterated, misbranded or contaminated products, including food

3.5 Food safety laboratories and facilities

The four laboratories visited during the field visit were the key government laboratories involved in food control, and each belongs to a different ministry or department. In general, laboratorial infrastructure and equipment related to food safety in Cambodia are described in Table 2. Alongside these, Cambodia operates four other government laboratories and two non-government laboratories for food testing. These laboratories and their mandates are as follows:

- **Camcontrol Testing Laboratory (CTL)**

The Camcontrol Testing laboratory (CTL), under the Camcontrol Directorate-General of

the Ministry of Commerce, is responsible for testing food samples for physical, chemical and microbiological contaminants to support Camcontrol's food inspection activities at border inspection posts and in local markets.

- **Industrial Laboratory Centre of Cambodia (ILCC)**

The ILCC, under the Ministry of Mines and Energy (MME), has as its main objective the provision of testing services for food analysis to support the work of MME's regulatory departments, food product safety and quality control systems, standards activities, and other non-governmental customers (in the private sector, NGOs and community) re-searching and improving food product quality and safety.

- **National Agricultural Laboratory (NAL)**

NAL is the reference laboratory of the Ministry of Agriculture, Forestry and Fisheries (MAFF) and focuses on testing pesticide products and fertilisers, as well as elements in soil and water.

- **National Health Product Quality Control Centre (NHPQCC)**

This laboratory under the Ministry of Health primarily performs drug quality control using instrumental analysis. It also plays a role in analysing samples from poisoning outbreaks.

- **Feed Quality Control Laboratory**

This laboratory, under the Ministry of Agriculture, Forestry and Fisheries, was still being developed at the time of writing. Details of its organisation and planned operations were not available at that time.

- **National Veterinary Research Institute (NaVRI)**

The National Veterinary Research Institute under the Ministry of Agriculture, Forestry and Fisheries primarily monitors animal health by carrying out serological, histological and bacteriological analyses. It no longer performs food analyses and so is not directly considered in this study.

- **National Metrology Laboratory (NML)**

Although metrology is an important factor in laboratory operation and accreditation, this laboratory, which presently operates under the Central Metrology Department of the Ministry of Mines and Energy, is not covered by this study.

- **Environmental Laboratory**

The Department of Environmental Pollution Control under the Ministry of Environment has run an analytical laboratory since 1996, supported by UNDP and the EU. Although the laboratory was visited for this study, it is not considered to be part of the present food safety system.

- **The Pasteur Institute of Cambodia (IPC)**

This international NGO maintains a large laboratory complex in Phnom Penh which covers a broad range of areas and operates a number of specialised laboratories. The

Institute’s Food Microbiology and Water Analysis Laboratory has been operating since 1996 and carries out routine services in three areas:

- o water microbiology
- o food microbiology and environmental samples (e.g. food preparation surfaces, air, water, etc.)
- o the chemical parameters of water

This laboratory, along with other IPC labs, collaborates with the Ministry of Health and has participated as a stakeholder in investigations into food-borne diseases with local and international partners.

• **Intertek Testing Services, Cambodia**

Intertek, located in southern Phnom Penh, provides a range of testing and quality-related solutions for industry. Their operations include textile testing and consumer product auditing and inspection, and the testing and inspection of bulk commodities cargo such as petroleum, chemicals, minerals, and food and agricultural products.

Table 4: An overview of laboratory infrastructure

Area	State of the Laboratory
Facilities	<ul style="list-style-type: none"> • To upgrade each of the five public sector laboratories, improvements are required in terms of layouts or the use of infrastructure/facilities. ISO 17025 requires that laboratories maintain environmental conditions which do not invalidate results or adversely affect the required quality of any measurement. The ILCC lab, built in 2006, is housed in a large air-conditioned building covering approximately 1,100 m² (three times larger than that of Camcontrol) and is ISO 17025 accredited. Alongside some unused space within the building, there is a reasonably large amount of land available around the laboratory for expansion. Modifications and improvements would, however, be necessary to achieve a suitable air exchange rate for the laboratory working environment, including the installation of additional fume cupboards and other extraction facilities. • Laboratory safety devices are lacking in many places and should therefore be uniformly introduced or their use increased in all laboratories. • HVAC systems appear to be neglected, and proper air exchange according to the type of laboratory is not guaranteed and not integrated into the lab’s design. • Another weak point is that not all laboratories have a waste management plan and the related facilities. When upgrading the laboratories, this should form an integral part of each laboratory’s design and management procedures.

Table 4: An overview of laboratory infrastructure (continued)

Area	State of the Laboratory
Equipment and supplies	<ul style="list-style-type: none"> • Equipment of varying levels of sophistication has been provided by development partners – especially the Asian Development Bank (ADB), the United Nations Industrial Development Organisation (UNIDO), the Norwegian Agency for Development Cooperation (NORAD) and others – over a number of years. Some are in use, some are no longer in use and some have not yet been used. • High-tech equipment to carry out, for example, gas chromatography–mass spectrometry (GC-MS), high performance liquid chromatography–mass spectrometry (HPLC-MS) or any tandem mass spectrometry (MS/MS) has not been found in any of the food laboratories. The EU and many other countries, however, require the use of this kind of equipment in their accredited laboratories in order to be able to detect very low levels of some contaminants, such as pesticides or veterinary drugs, and for confirmation of positive results obtained in many cases through screening tests.
Volumes and types of test performed	<ul style="list-style-type: none"> • The volumes and types of tests performed indicate that, on average, 4,000 food safety samples would be collected. However, this information is based on indicative figures related to the testing protocol. General food safety monitoring as part of a ‘National Residue Plan’ would have to be worked out based on more concrete data for the agricultural environment, which is not available at this time. It should also be clearly stated that this can be quite a complex task, requiring the involvement of additional specialists and a set of basic data on the agricultural production and trading environment.
Staff qualifications, experience and skills	<p>Food safety monitoring and the use of the required highly sophisticated analytical laboratory instrumentation needs permanent, motivated, highly qualified and specialised analytical chemists, food chemists and microbiologists. The education and training of such people is costly and salaries should aim to reflect this. However, the remuneration of staff employed in government laboratories is quite low and there are few incentives in place to drive higher performance.</p> <ul style="list-style-type: none"> • Well-qualified specialists may be easily attracted to better paid jobs in the food industry or other parts of the private sector. In Cambodia, there is an internal staff rotation policy between departments which has a direct and negative effect on the delivery of work. Camcontrol, for instance, regularly rotates laboratory staff, posting them in border inspection labs where they must undertake other kinds of work.



CI's visit to the NHPQCC and ILCC Laboratories in Phnom Penh

The development of Cambodia's laboratory infrastructure and environment is still wanting and laboratories are not yet placed to carry out highly sophisticated analytical laboratory operations. Existing laboratories cannot cope with the demands of supporting modern food safety systems and SPS requirements without major change.

Several laboratories operate more or less in parallel, meaning they partially duplicate work and compete with each other. However, none of them is in a position to offer the full range of required services at the expected levels of quality and quantity. The laboratory's mandates are not always clear and also seem to overlap; and, above all, there appears to be little recognition of the difference between public and commercial interests.

3.6 Risk management

The research and key informant interview (KII) information from Camcontrol indicates that Cambodia does not have an active programme of food-borne illness surveillance and outbreak responses are often limited by the lack of available expertise. Moreover, reports show that there have been hardly any cases of food being recalled from the market. Risk analysis in Cambodia takes a purely reactive approach; traceability mechanisms are limited and there is no national reporting database in place.

The approach to risk communication function is traditional; when a risk is detected, information is shared with the public through the media and/or government offices in all 24 provinces.

3.7 Accreditation and certification services

Cambodia's good agricultural practice (GAP) standards were developed in line with the ASEAN GAP. These were annexed to the draft of the MAFF Ministerial Proclamation (Prakas) on the System of Good Agricultural Practice for fresh fruit and vegetables. The Plant Protection and SPS Department, in cooperation with other specialised departments, will play a key role as the GAP certification body.

SPS issues in Cambodia are important for developing the agricultural sector (by reducing losses from pests or diseases), protecting public health (by reducing the incidence of food-borne and zoonotic diseases) and market access (permitting export growth by satisfying the SPS requirements of trading partners). However, Cambodia's SPS assessment needs are fragmented.



CI meeting with the SPS Focal Person in the Department of Agriculture, Phnom Penh

SPS received scant attention in the National Strategic Development Plan (NSDP) and the Diagnostic Trade Integration Study (DTIS), and no SPS action plan has been drawn up for Cambodia. FAO, with the assistance of the Standards and Trade Development Facility (STDF), has commissioned a study to determine the scope of an SPS action plan for Cambodia. The study report developed an action plan to improve SPS capacity in Cambodia and made recommendations on immediate and longer-term actions to improve how Cambodia's management system for sanitary and phytosanitary (SPS) matters works. It explains the need to resolve the mandates of the agencies involved in SPS-related control and certification activities, and suggests ways forward in other areas while these mandates are being resolved – most importantly in building technical and operational capacity.

Cambodia has adopted several foreign and international standards for its own use, such as those of ISO, Codex, IEC, Thailand and Singapore. As indicated in Standards Development above, draft standards relating to industrial products must be submitted to the Industrial Standards Technical Committee for approval and draft standards relating to food must be submitted to the Cambodia National Codex Committee (CNCC), which was established by sub-decree and comprises eight members. CNCC considers matters related to policy on the safety and quality of products and services, consumer protection and fair trade, and it coordinates the relevant ministries involved in food safety matters.

The certification system in Cambodia is divided up in many different ways. For example, the Ministry of Mines and Energy issues local product registration certificates and the Ministry of

Commerce is in charge of providing export or pre-shipment certification. However, this certification system and these certification bodies still do not comply with international requirements.

3.8 Education, awareness and training

The Fraud and Deceitful Advertising Repression Office, under Camcontrol, is responsible for consumer education and information programmes in Cambodia. Pursuant to this mandate, Camcontrol has developed a strategic plan for 2008-2013, which includes train-the-trainer programmes and consumer education campaigns on product quality, safety and services. Camcontrol's education campaigns have been delivered using a number of parallel approaches:

- Seminars provided for traders, craftspeople and students explained the provisions of the LMQSPS. The seminars included training in the contents of the relevant legislation and provided recommendations on how best to choose food products (including canned and packaged food), expiry dates, general hygiene at food outlets and the risks caused by drug use.
- Given that consumer education is not yet part of the basic curriculum of the education system, Camcontrol-trained trainers delivered education and information campaigns in schools.
- Printed materials including banners, instructional posters and flyers were distributed covering product labelling, product safety, hygiene and food-borne disease, and publications were issued on efficient energy use and health issues related to the use of tobacco and drugs.
- A television campaign was broadcast comprising a combination of paid television advertisements and unpaid public service announcements aired voluntarily by the broadcaster (there is no quota for compulsory airtime for public service announcements in Cambodia).

The following education and training programmes are currently available in Cambodia:

- With its National Centre for Health Promotion, the Ministry of Health plays a leading role in delivering food safety education to consumers. The Centre is actively involved in health education and food safety for the public and school children, but it has developed and uses limited information, education and communication materials.
- Between 1998 and 2004, agriculture authorities conducted an extensive integrated pest management (IPM) programme in 15 provinces. This programme (supported by the Danish International Development Agency and the World Bank) has trained 80,000 farmers (i.e. less than 1% to 2% of the total farming population) in IPM rice farmer communities. Village animal health workers conduct training as part of their regular duties.
- The Ministry of Commerce has delivered several seminars and workshops at the national level on topics related to food safety, including on how Codex works. In addition, the Ministry runs a staff exchange programme with other Asian countries.

However, because of the limited reach of such efforts most farmers, fishermen, food processors, food handlers and consumers are still in need of education and training in relation to food safety. In order for food safety education and training to have a significant impact on

the safety of food, a comprehensive, more focused and better resourced programme is absolutely essential. For developing consumer awareness, most key informants agreed that television would be the most suitable medium, although in rural areas radio might be more effective. Awareness also needs to be raised among businesses, with the aim of stimulating a better culture of consumer protection.

3.9 Human resource capacity and development

Cambodian legislation does not stipulate the training requirements for food inspectors. Inspectors do not have degree-level qualifications and have minimal training in risk-based approaches to food safety. However, with the assistance of FAO, key Camcontrol inspectors have received some training on the quality control of food. The purpose of this training is to ensure Camcontrol could effectively implement its responsibilities in relation to the inspection of imported food. In most of Cambodia's ministries, there is lack of adequate and trained human resources. Camcontrol was at pains to highlight the fact that it needs more staff to deal with food safety matters. It also reported a need for infrastructure support to enable it to engage in networking with provincial officers. The need for greater inspection and testing capacity was also identified by almost all key informants. Due to the lack of local capacity, ISC sends products abroad for testing, whereas the other ministries attempt to test locally, but with limited effectiveness.

3.10 Food safety initiatives in Cambodia

Recently, FAO and WHO have been working with the governments of Cambodia, Lao People's Democratic Republic and Viet Nam on formulating a regional programme to improve food safety. The principal objectives of the programme are to strengthen the capacity of national authorities to regulate and enforce food safety, to assist rural communities and small businesses to produce and process safe food and to reduce the incidence of food-borne diseases. By providing support in developing a modern and science-based food control system, this programme aims to reduce food safety risks for domestic consumers in Cambodia and promote economic development through increased food and agricultural exports that meet international sanitary and phytosanitary requirements. The key strategies under this programme are:

- assisting authorities in rationalising policies, laws and standards related to food safety and quality
- information sharing and exchange of good practices between the participating countries
- enhancing the skills of inspectors and facilitating effective enforcement of regulations
- strengthening the capacity of countries to monitor food contamination and apply such information for risk management purposes
- facilitating the application of good agricultural practices (GAP), good hygiene practices (GHP), quality assurance (QA) and the hazard analysis and critical control point system (HACCP) in small and medium-sized agri-food businesses
- increasing awareness and knowledge about food safety among consumers and the

women and men responsible for food production, processing, handling and marketing in rural communities

- developing and implementing food-borne disease surveillance systems

Reflecting the importance of food safety to enhance public health as well as economic development, a number of completed and ongoing projects have addressed various challenges facing food safety and quality in Cambodia. These include:

- the FAO Technical Cooperation Project (TCP), which sought to strengthen the National Codex Committee in Cambodia and build the capacity of Camcontrol in the areas of food inspection, food analysis and import control (1999-2001)
- UNIDO's work to support the Ministry of Mines and Energy in developing standards on labelling and certification for vinegar, fish sauce, soy sauce and chilli sauce that comply with Industrial Standards Cambodia
- WHO's provision, since the early 1990s, of a number of short-term consultancies that focused on strengthening the capacity of the health authorities to implement a programme on food control and involved the training of health workers in basic food safety

3.11 ASEAN Common Food Control Requirements (ACFCR) in Cambodia

Harmonisation of food safety standards in the ASEAN region is key to the successful transition of ASEAN into a single-market community by 2015 (ASEAN Economic Community), which is expected to foster stronger intra-ASEAN and international trade in food and agricultural produce. The ASEAN Concord II is a significant declaration in that it highlights how essential effective national food control systems are for protecting the health of consumers and how critical they are for enabling countries to assure the safety and quality of their food. ASEAN recognises the need for developing food control systems, taking into account the obligations under the WTO's Sanitary and Phytosanitary (SPS) and Technical Barriers to Trade (TBT) Agreements, which carry great weight in terms of international trade. As such, the commitment of member countries to deepen internal economic integration in order to realise the ASEAN Economic Community in 2020 is important. Issues to be considered when establishing, updating, strengthening or revising food control systems where national authorities are accountable are:

- developing science-based food control strategies
- establishing priorities based on risk analysis and the effectiveness of risk management
- maximising risk reduction by applying the principle of prevention throughout the food chain from farm to table
- establishing emergency procedures and rapid alert systems to facilitate the withdrawal or recall of products
- establishing guidelines for the exchange of information in food control emergency situations and rejections of imported food
- recognising that ensuring food safety requires positive interaction among all stakeholders involved in food control management

ASEAN member countries where possible and appropriate should develop national food

control systems taking into account the above factors. By the same token, the common set of guiding principles for establishing food control measures in ASEAN Member Countries is as follows:

- 1. Integrated farm-to-table concept:** To achieve maximum consumer protection, it is essential that safety and quality measures be built in and implemented from production to consumption. This calls for a comprehensive and integrated farm-to-table approach in which everyone in the food chain has to play an essential role in ensuring food safety and quality.
- 2. Risk analysis:** Risk analysis based on assessment, management and communication should be the foundation of food control policy in ASEAN countries for controlling food safety hazards at the country level as well as at the regional level. The adoption and implementation of risk analysis within food control systems in ASEAN Member Countries is encouraged
- 3. Transparency:** Food control systems should be developed and implemented in a transparent manner, where stakeholders in the food chain should be allowed to make effective contributions and, where appropriate, the rationale for new food control measures should be explained. This will encourage cooperation from all parties concerned and improve efficiency and the compliance rate. The confidence of consumers in the safety and quality of the food supply depends on their perception of the integrity and effectiveness of food control operations and activities.
- 4. Regulatory impact assessment:** Regulatory impact assessments assist food control agencies in making a reliable evaluation of the impact of regulations on producers and consumers, and in formulating adjustments or revisions in their strategies to achieve the most beneficial effect.

Similarly, the ASEAN Common Principles and Requirements for Food Labelling and Hygiene provide guidance on general requirements for the labelling of pre-packaged food and basic food hygiene principles in ASEAN countries. In addition, Common Requirements for Food Hygiene emphasises the effective hygiene control measures needed for ensuring consumer safety as well as for preventing economic loss arising from possible food-borne hazards. These common requirements guide food operators and/or food producers to comply with the food hygiene provisions in food production from farm to table. Elaborating on the hygiene measures to be followed from primary production, through processing, to consumption, the requirements address the need for the development of workable food safety systems, such as an HACCP-based control system in all ASEAN countries.

In Cambodia, harmonisation of ASEAN common food control requirements is still a distant reality. The country's weak legislative, administrative and physical infrastructure means that efforts must focus on building the overall capacity for diagnosis and enforcement for all areas of food safety, plant health and animal health in Cambodia. The country's capacities (including facilities, equipment and human resources) for inspection and certification, and also surveillance, monitoring and risk analysis, etc. need to be strengthened. There is a strong need to mainstream the ASEAN guiding principles for integrating food control measures into the work of all relevant agencies to improve coordination and communication among central and decentralised institutions in the country.

4.

Prioritising recommendations

Given the rapid development of our scientific and technical understanding of food-borne hazards to human health, it is essential that Cambodia installs a strong food control system. The overall observation from research indicates that food control measures in Cambodia remain weak. The responsibilities for food control are dispersed among different ministries and agencies, which have poorly-defined and sometimes overlapping mandates in this area. The government has established an Inter-Ministerial Committee Coordinating the Inspection of Quality and Safety of Products and Services (IMC) and located its secretariat in the Ministry of Commerce's Camcontrol Department. However, our research indicates that this committee is relatively inactive.

The food safety working group, tasked with improving coordination among concerned departments in the Ministry of Health, also meets infrequently. Although some efforts have been made to increase the level of officials' knowledge about food standardisation and food safety issues (including an FAO project to strengthen the National Codex Committee, which has its secretariat in Camcontrol), further work is needed

National capacity for food inspection is also weak. A number of different agencies (the Ministry of Commerce, Ministry of Agriculture, Forestry and Fisheries, Ministry of Mines and Energy and the health authorities) are involved in inspection, leading to the duplication and overlapping of roles and responsibilities. Although the capacity of the Ministry of Commerce's inspectorate is strong, the capability of inspectors serving in the Ministry of Health is weak. In general, there are also many gaps in the implementation of inspection in food production, processing, handling and sales. Inspectors are not specialised in the necessary aspects of food control. Inadequate training and possible corruption in enforcement are constraints.

Although the Pasteur Institute and some government laboratories provide high-level expertise in particular analyses, laboratory personnel generally lack training in analytical methods and quality assurance, and the overall capacity for food monitoring and disease surveillance is limited. Laboratories tend to work in isolation from each other contributing to overlaps between activities. Risk analysis has not been adopted as a basis for decision-making. In spite of some efforts to support food safety education and training (notably an extensive integrated pest management programme), the vast majority of farmers, fishermen, food processors, food handlers and consumers remain uninformed about food safety and, as a result, lack the capacity to comply with modern food quality and safety assurance requirements.

Being a strongly agriculture-based country with an expanding food-processing industry, Cambodia has the potential to become a major food supplier in ASEAN provided that standards improve and the increasing concerns of consumers are addressed. It should be noted that the weak food safety control measures currently in place can impede trade and significantly affect Cambodia's ability to access markets, particularly in industrialised countries.

Increasing concern about food-borne illnesses in Cambodia must be managed and the many examples of failures to control unsafe, fraudulent and improperly labelled food must be prevented from reoccurring. Cambodia needs to learn from the mistakes of developed countries and draw benefit from the significant time and resources these countries have spent trying to improve their own food control strategies. The overall analysis shows that Cambodia is on the pathway to safer food where authorities can choose either to better coordinate food control activities using a risk-based farm-to-table approach or address the legal, institutional and human resource capacity gaps that are holding back food control measures in Cambodia, such as:

- multiple and overlapping laws, regulations and standards, i.e. the lack of a coordinated food safety policy
- disagreements regarding food control management responsibilities, i.e. the lack of inter-ministerial coordination and overlapping responsibilities
- poorly equipped laboratories and testing facilities
- untrained human resources and personnel – specifically, the lack of expertise required to work on specific food safety issues and the fact that staff administering food safety do not have the appropriate skills
- poorly focused enforcement activities, particularly the lack of effective border controls (inspection and monitoring)
- the lack of a risk management function
- ineffective communication, training and education
- the lack of national standards on food safety and management
- the absence of consumer representation or consumer voice in food safety matters

4.1 Recommended resource mobilisation

Accession to the WTO and the signing of key agreements could provide the impetus for Cambodia to take stock of what is being done and of what needs to be done better – this is what has happened in other countries in the region such as China and Vietnam. To avail itself of this opportunity, Cambodia needs to improve its food safety control measures, focusing on:

- the health and wellbeing of the country's consumers
- developing science-based food control strategies
- establishing initiatives, along the farm-to-table continuum, that target both risk and economic development
- recognising that food control is a responsibility shared by all stakeholders

Research has determined the priority areas and strengthening activities for the planning,

development, implementation and enforcement of food safety control measures in Cambodia, based on a priority scorecard (Table 5).

Table 5: Priority areas for FSCM strengthening in Cambodia

Focus areas	Strengthening activities	Action point and agency responsible
Food safety compliance	<ul style="list-style-type: none"> • Undertake product registration throughout the country to improve traceability mechanisms in the case of outbreaks • Make the certification of food and agricultural products mandatory • Develop food safety standards by adopting ASEAN or other International standards on GMOs, organic food, pesticide residues in vegetables, food additives, the use of veterinary drugs in animals/ meat, etc. 	IMP 868*
Food import control system	<p>Undertake enforcement activities by:</p> <ul style="list-style-type: none"> • establishing inspection procedures based on a risk management approach • carrying out regular visits to food premises and monitoring cross-border trade and food safety practices • investigating consumer complaints that allege breaches of food safety laws • developing a consistent, balanced and fair enforcement strategy with all relevant agencies in the country, including the media • implementing laws/regulations and setting targets for enforcement 	Camcontrol/MAFF
Food safety indicators	<ul style="list-style-type: none"> • Develop food safety indicators based on the ASEAN Food Safety Indicators • Develop a coordinated action plan to join up the work of all of the ministries involved in food standards 	IMP 868
Laws and regulations	<ul style="list-style-type: none"> • Develop a food safety policy for establishing national food safety objectives and requirements, and guidance for application in the specific sectors of the food supply chain (production, processing, storage, transportation and marketing) 	MoC and IMP 868
Food safety laboratories and facilities	<ul style="list-style-type: none"> • Develop the capacity of laboratories to conduct food product testing • Provide basic food testing facilities at border checkpoints 	ISC

Table 5: Priority areas for FSCM strengthening in Cambodia (continued)

Focus areas	Strengthening activities	Action point and agency responsible
Human resource development	<ul style="list-style-type: none"> • Train staff to enforce the laws/regulations • Provide food safety training to qualified and certified food inspectors and lab technicians from MoC, MoH and other relevant ministries • Recruit specialised staff and expertise for all the relevant agencies 	IMP 868
Monitoring and surveillance	<ul style="list-style-type: none"> • Utilise test kits for conducting monitoring in the domestic market • Develop a comprehensive monitoring strategy with all relevant agencies in the country, including the media and civil society organisations 	Camcontrol and IMP 868
Safety assurance and labelling	<ul style="list-style-type: none"> • Enforce labelling regulations and educate consumers regarding labelling • Develop compliance measures to ensure the food industry adheres to food safety labelling requirements 	IMP 868
Accreditation and certification services	<ul style="list-style-type: none"> • Strengthen existing certification services to cover GMO foods, organic food production, etc. 	ISC
International participation and recognition	<ul style="list-style-type: none"> • Participate in Codex meetings on food safety and in ASEAN and other regional meetings, including ISO, to strengthen the export certification system 	IMP 868
Communication and information	<ul style="list-style-type: none"> • Develop a database on food-borne illness outbreaks in the country • Set up a mechanism to share information on food safety issues and food crisis management with the relevant agencies 	IMP 868
Education, awareness and training	<ul style="list-style-type: none"> • Deliver consumer education through both electronic and print media • Set up an independent consumer protection association • Set up a programme specifically for consumer education • Raise public awareness on food safety issues 	IMP 868
Research and development	<ul style="list-style-type: none"> • Conduct research on specific food safety issues • Conduct risk assessments 	IMP 868

*IMP refers to the Inter-Ministerial Prakas on the Implementation and Institutional Arrangements of Food Safety Based on the Farm-to-Table Approach.

The research shows that specific organisational assistance needs to be provided in order to strengthen the system as described in Table 6.

Table 6: Organisational assistance required for strengthening FSCM in Cambodia

Agency	Type of assistance
Food Safety Bureau in the Department of Drugs and Food	<ul style="list-style-type: none"> • Assist in the development of a food safety policy • Assist in the development of traceability mechanisms • Assist in the development and maintenance of a database
General Directorate of Agriculture	<ul style="list-style-type: none"> • Provide expert assistance on GAP and food safety • Equip a laboratory facility (maximum residue limits laboratory) • Assist in awareness-raising at the grassroots level • Build capacities through exposure visits
ISC	<ul style="list-style-type: none"> • Assist in the development of food-related standards • Assist in developing the capacities and experience of ISO auditors • Strengthen standards development by making voluntary standards mandatory • Draw up halal standards • Develop and maintain a database (establishing baseline data) • Strengthen the capacity of technical committees to develop standards • Develop and strengthen consumer organisations and ensure their participation in standards development and food safety issues
ILCC	<ul style="list-style-type: none"> • Improve financial capacities to sustain operations (accreditation fees) • Provide technical assistance and training on new equipment (high-performance liquid chromatography, gas chromatography, atomic absorption spectrometry)
Camcontrol Lab	<ul style="list-style-type: none"> • Develop a high-risk foods list. • Provide technical assistance and training on a set of detection methods, equipment and data analysis methodologies (ELISA test kits for beta-agonists and aflatoxin; gas chromatography–mass spectrometry)
Consumer Protection Association	<p>Establish an independent consumer protection association for promoting consumer rights and interests. To achieve this, the following activities are recommended:</p> <ul style="list-style-type: none"> • conduct a market survey to understand the problems encountered by consumers in Cambodia • send consumer leaders on internships in successful consumer organisations in the ASEAN region • deliver training workshops in Cambodia for specific target groups • produce and disseminate materials on consumer issues in the local language

5.

Conclusion

With ASEAN countries moving rapidly towards the formation of the ASEAN Economic Community (AEC) by 2015, Cambodia needs to address, among other issues, food safety control in the country. The food safety system must ultimately be able to prevent exposure to unacceptable levels of food-borne hazards along the entire food chain, and it should aim to bring scientific objectivity and balance to food safety initiatives. Pro-consumer approaches need to be put in place to build consumer confidence and also to advocate and assist in the development of a risk-based, sustainable and integrated food safety control system. Cambodia needs to develop an integrated approach to addressing food safety control that will enable different government departments to effectively and promptly assess, communicate and manage food-borne risks/crises, while ensuring import and domestic controls. All of these areas require the concerted efforts of all relevant stakeholders.

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Appendices

Appendix 1: Research methodology

In order to ensure uniform analysis on aspects relating to food safety control measures, the research adopted standardised and identical terms in the design and execution of the research in each country. These terms are generally aligned with Codex guidelines and include:

- **Control measure:** any action and activity that can be used to prevent or eliminate a food safety hazard or reduce it to an acceptable level.
- **Food safety control system:** the combination of control measures that, when taken as a whole, ensures that food is safe for its intended use.
- **Monitoring:** the act of conducting a planned sequence of observations or measurements of control parameters to assess whether a control measure is under control.
- **Validation:** obtaining evidence that a control measure or combination of control measures, if properly implemented, is capable of controlling the hazard to a specified outcome.
- **Verification:** the application of methods, procedures, tests and other evaluations, in addition to monitoring, to determine whether a control measure is or has been operating as intended.

The above measures are considered as the main components of the research.

Selection of stakeholders

As food safety and food control measures in each country are carried out by different agencies and authorities, the identification and selection of relevant stakeholders (to be key informants) and the coordination of field visits and the roundtable discussion (RTD) was carried out with the assistance of country partners, namely local civil society organisations in each country. The selected stakeholders represent the various groupings that deliver the functions, roles and areas of involvement along the food safety (measures) value chain.

The main groupings of stakeholders are:

- **policymakers and implementers:** government agencies and authorities (including public health, food safety, agriculture, fisheries, livestock, standards, accreditation bodies, etc.)
- **facilities:** food testing laboratories, import checkpoints, food processing, handling and marketing
- **food safety interest groups:** consumer organisations, NGOs, FAO, WHO, etc.
- **the private sector:** producers, importers and exporters
- **human resources:** food safety inspectors, laboratory technicians and food safety experts

The local partner supporting CI in the implementation of the research was the Cambodian Institute for Research and Rural Development (CIRD).

Data gathering

This research used a qualitative approach for data gathering and analysis that was ultimately used for inventory and documentation purposes. To this end, survey questionnaires were

developed to assist in gathering data and implementing research, which ran as follows:

Secondary data gathering	The desk research involved a study of relevant documents and publications and a literature search of available documents and reports relating to food safety and food control measures. Secondary data was also gathered by the local partner using the Focal Point Questionnaire, which mainly focuses on three key components of the food control system: food legislation; food control management; and information, education and communication. This includes gathering data relating to acts and laws, rules and regulations, codes of conduct and government policies etc.
Primary data gathering	Data are collected through key informant interviews (KII), field visits and roundtable discussion (RTD). This approach involves specific sets of questions designed for specific key informants, sites visited or organisations met in relation to food safety control measures. The key informants are persons in senior positions involved in policymaking or enforcement (from different departments) or individuals who are involved in monitoring, awareness-raising and/or policy advocacy. These individuals were identified in consultation with in-country partner organisations. For the KIIs, open-ended questions were used to probe for more detail on the information already gathered in the secondary research. This included, for example, probing into specific details, facts and figures related to food safety relevant to the responsibilities and functions of the key informants.
Validation	A half-day RTD with participants from selected stakeholder organisations was delivered. The main aim of the RTD event was to share and validate the key findings of the Focal Point Questionnaire, key informant interviews and site visit observations in order to strengthen the validity, accuracy and reliability of the data and information collected. The participants included mid-level or junior-level representatives from the same organisations or agencies the team had met during their country visit.
Data analysis and reporting	Using the data collected in the above three stages, cross-verification was subsequently used as the principal analysis method for this study and country report, involving: <ul style="list-style-type: none"> • standardised data entry templates created for data reporting • a standardised PowerPoint template created for the RTD • a standardised RTD format and procedures

Overview of the methodology employed

Step 1	Gather secondary data related to food safety control measures.
Step 2	Carry out consultations among CI and partners regarding stakeholder identification, consultation, analysis and responsibilities.

Step 3	Design questionnaires using preliminary and baseline information gathered in Step 1 and the findings from Step 2 .
Step 4	Carry out a pilot study/pre-testing among partners to test the adequacy of the instruments.
Step 5	Revise questionnaires based on findings from the pilot study and feedback from GIZ to ensure appropriateness in the local context
Step 6	Disseminate the Focal Point Questionnaire to country partners, to be completed prior to field visits.
Step 7	Ask a specific set of questions to the identified key informants during the field visit. The questions are selected from the Master Questionnaire (KII), which is then frequently updated and modified during the interview process to allow researchers to probe more deeply
Step 8	Conduct roundtable discussions following the completion of key informant interviews to validate and share findings.

Sample size: Due to time and budget restrictions, 11 key informants were interviewed and four site visits (to laboratories, import/export points, public food preparation sites and markets) were conducted in Cambodia from 19 to 24 July 2013. The RTD was held on 25 July with 15 participants who comprised mostly government officials from the middle management tier of different ministries. A list of the RTD participants is appended below.

Qualitative information obtained from the key informant interviews and roundtable interviews was used to substantiate or supplement quantitative information obtained from the general survey. The open-ended key informant interviews and roundtable discussion served as a sounding board to fill in any information gaps and to check the validity and relevance of the research. The findings of these processes informed the development of this report and also set recommendations and a road map of the strategic thrust areas for improving food safety control in Cambodia.

Capacity-building needs and gap analyses

The identification of capacity-building needs and gaps was accomplished by performing a systematic analysis of the information gathered through the secondary and primary research. The information gathered from the above-mentioned analysis was used to identify gaps in the existing operating context for food safety control in the country. An index was developed to be used as a checklist for identifying gaps and priorities, and its level was based on analysis of the research and the capacity-building need.

Profile of stakeholders

Generally, the stakeholders were identified based on their direct and indirect involvement in food safety including:

- government entities
- national non-governmental organisations (NGOs) and civil society organisations (CSOs), including consumer associations working on food issues

The 11 food-safety-related stakeholders in Cambodia that participated in this study can be categorised under three main groups:

- government agencies
- UN and non-government organisations
- laboratories

A) Government agencies

- Ministry of Environment (MoE)
- Food Safety Bureau, Ministry of Health (MoH)
- Institute of Standards of Cambodia (ISC)
- General Directorate of Agriculture
- Camcontrol, Ministry of Commerce (MoC)

B) UN and non-governmental organisations

- FAO Cambodia
- Groupe de Recherches et d'Echanges Technologiques (GRET) – an INGO
- Cambodian Institute for Research and Rural Development CIRDC – an NGO
- Consumers Association of Cambodia

C) Laboratories

- Camcontrol, Ministry of Commerce
- National Health Products Quality Control Centre
- Industrial Laboratory Centre of Cambodia (ILCC).

Limitations

- Due to general elections taking place in the country, some relevant stakeholders were not able to participate in the research, key informant interviews and RTD.
- Accessing detailed materials primarily depended on the resources, publications or reports being available online, a situation compounded by the limited availability of these documents in English. Data was also mainly based on secondary compilation by the focal points (local partner) and key informants. However, it was noted during the course of the interviews that the participants might have limited knowledge or experience in answering some of the questions pertinent to areas beyond the scope of their functions.
- Complete data on enforcement is also critically lacking in this report due to the lack of participation of enforcement units or departments. Only small passing references and general remarks were made by key informants – no specific mention was made nor were reference materials, cases or statistics provided in this regard.

Appendix 2: Field visits and appointments

Date (2013)	Activities	Location
19 July	Arrival of the CI mission team	
20 July	Planning and coordination of the visit	
21 July	Visit to Bavet International Border in Svay Rieng Province	
22 July	Ministry of Environment (MoE) Nin Vantha # 48, Samdach, Preah Sihanouk, Tonle Bassac, Phnom Penh Tel: +855 11 872436 Email: moe-cabinet@camnet.com.kh Web: www.moe.gov.kh	MoE office
22 July	Visiting the Orusey Market	
22 July	Ministry of Health (MoH) Dr Aing Hoksrun, Chief of the Food Safety Bureau Address: 151-153, Kampuchea Krom Blvd, Phnom Penh Tel: +855 85538066, 77804966 Email: hoksrunaing@gmail.com Web: www.moh.gov.kh	MoH office
22 July	Institute of Standards of Cambodia (ISC) Mr Chan Borin, Deputy Director General Address: # 538 National Road 2, Chak Angre Leu, Meanchey District, Phnom Penh Tel: 012 751 571	ISC office
23 July	Food and Agriculture Organization of the United Nations Ms Nina Brandstrup, FAO Representative in Cambodia Email: Nina.Brandstrup@fao.org Web: www.fao.org	FAO office
23 July	Groupe de Recherches et d'Echanges Technologiques (GRET) Mr Aing Poro, Country Representative Project Manager Tel: +855 12 626203	GRET office
23 July	Cambodian Institute for Research and Rural Development (CIRD) Mr Prak Sereyvath, Executive Director Address: # 35, Street 410 Sangkat Beug Trabek, Khan Chamkarmon, Phnom Penh Tel: +855 12 887966 Email: prakseriyvath@online.com.kh	CIRD office
23 July	Consumer Association of Cambodia (CAC) Mr Mok Mey	Hotel Hemawari, Phnom Penh

Date (2013)	Activities	Location
24 July	Department of Agriculture of the Ministry of Agriculture, Forestry and Fisheries	Office of the Department of Agriculture of the Ministry of Agriculture, Forestry and Fisheries
24 July	Ministry of Mines and Energy (MME) and the Industrial Laboratory Centre of Cambodia (ILCC) Mr In Sambo, Director of ILCC Tel: +855 12 249141 Email: insambo@yahoo.com	MIME office
24 July	Camcontrol Laboratory Mr Dim Theng Tel: +855 12 526660 Email: dimtheng@gmail.com	Camcontrol office
25 July	Roundtable discussion	Hotel Hemawari, Phnom Penh
26 July	Departure of the CI mission team	

Appendix 3: Roundtable discussion



Roundtable discussion in Phnom Penh

25 July 2013

- 09.00 – 09.30: Registration
- 09.30 – 09.40: Welcome by CIRD
- 09.40 – 10.00: Introduction to Consumers International
by Dr Anni Mitin, Policy Officer, Consumers International
- 10.00 – 10.30: Tea
- 10.30 – 11.00: Presentation of the assessment findings on food control measures in
Cambodia by Dr Anni Mitin and Satya Sharma, Consumers International
- 11.00 – 12.30: Open discussion on a future agenda
- 12.30 – 12.45: Closing Remarks by CIRD

Lunch

* * *

Appendix 4: Participants in the roundtable

<p>Seng Chhang Director Cambodia Certification Department (CCD) Institute of Standards Cambodia (ISC) Ministry of Mines and Energy # 538 National Rd 2, Sangkat Chak Angre Leu, Khan Meanchey, Phnom Penh Tel: +855 12669686, 16977471 Email: Schhang.ccd@gmail.com</p>	<p>Paris Chuop Assistant FAO Representative (Pro- gramme) Food and Agriculture Organization # 5 Street 370, Boeung Keng Kang I, Khan Chamcamorn, PO Box 53, Phnom Penh Tel: +855 (23) 216566 Email: Paris.chuop@fao.org Web: www.fao.org</p>
<p>Srey Siyorn Deputy Director of ILCC General Department of Industry Industrial Laboratory Centre of Cambodia (ILCC) Ministry of Mines and Energy Address: # 45 Preach Norodom Blvd, Phnom Penh Tel: +855 12794688 Email: Ssy_ilcc@yahoo.com</p>	<p>Meas Chanty Agro-Development GRET # 22 Street 330, Boeung Keng Kang III PO Box 57, Phnom Penh Tel: +855 (23) 220259, 220343 Email: measchanty60@gmail.com Web: www.gret.org</p>
<p>Chheng Nakry Junior Researcher Cambodian Institute for Research and Ru- ral Development # 35 Street 410, Sangkat Boeung Trabek Khan Chamkar Morn, PO Box 2543, Phnom Penh Tel: +855 (23) 726728 Email: nakrychheng@online.com.kh Web: www.cird.org.kh</p>	<p>Sok Sarang Programme Officer Cambodian Institute for Research and Ru- ral Development # 35 St 410, Sangkat Boeung Trabek Khan Chamkar Morn, PO Box 2543, Phnom Penh Tel: +855 (23) 726728 Email: soksarang@online.com.kh Web: www.cird.org.kh</p>
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<p>Nin Vantha Ministry of Environment # 48, Samdach Preah Sihanouk, Tonle Bassac, Phnom Penh, Cambodia. Tel: +855 11872436 Email: moe-cabinet@camnet.com.kh Web: www.moe.gov.kh</p>	

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