## Business Scouts



## SECTOR BRIEF CAMBODIA: Waste Management



## **Current situation**

Cambodia's rapid economic and urban development, coupled with a growing middle class, has led to significant waste generation in its bigger cities. The country generates 4.78 million tonnes of municipal solid waste (MSW) per year, equivalent to 0.78 kg per day per capita. Waste management faces challenges at every stage: collection, disposal, and recycling. Inefficiencies within the sector have caused health and environmental problems, including air and water pollution. Waste collection and management have thus become major issues that need to be addressed – particularly in the main cities of Phnom Penh, Battambang, Siem Reap, and Sihanoukville.

#### **Collection and Disposal**

The Royal Government of Cambodia (RGC) decentralized waste management to local levels in 1999, but some local authorities still struggle to fulfil their role. In many cities, private companies operate waste collection and transport services, but some of the country's total 204 cities and towns still lack waste management services altogether. As of 2021, only 175 (86%) of them have access to MSW collection services and only 65% of total MSW generated in Cambodia is currently collected. The Ministry of Environment (MoE) has developed policies and guidelines to support local governments, while also providing equipment and training. However, many municipalities lack financial resources and land available for landfill sites, as well as qualified staff for waste management operators. Waste management fee collection poses another major challenge. Consequently, households and local businesses often burn or dispose of waste in public spaces, waterways, and vacant areas. The lack of education, particularly in rural areas, makes changing behaviours challenging.

The capital Phnom Penh is a major waste generator. In 2023, the Phnom Penh Capital Administration (PPCA) reported up to 3,700 tonnes of waste collected and transported per day by registered waste collection companies; a staggering increase by 1,000 tonnes compared to 2021. PPCA manages only one treatment site – the Dangkor landfill – where in 2021, 3,600 tonnes of waste per day were disposed of. Improvements have been made, but this facility is still not following basic international standards and has already exceeded its designed capacity. As a result, the MoE is currently monitoring the construction of a new regional landfill site west of the capital, as well as a waste transfer station in the north. CINTRI was the primary waste collection and transportation company in Phnom Penh until 2020, when waste collection services were split between different companies including GAEA and Mizuda. Today, with 10-year contracts, each of them serves one of the zones defined in the city's three-zone garbage collection system, implemented in 2021. Waste collection fees in the city are managed by the Phnom Penh Waste Management Authority (PPWMA) and were previously included in electricity bills managed by Electricité du Cambodge (EDC). The fees vary based on property type. However, similar to other cities, the collection fee system poses challenges for waste treatment initiatives due to insufficient coverage of operational costs.

According to MoE statistics, MSW is comprised of 50–65% of organic (mostly food) waste. Since 70–80% of generated waste ends up in landfills, they reach full capacity prematurely due to lack of waste separation and of proper organic waste processing. Consequently, PPCA issued a directive in 2021 requiring households to segregate waste into wet and dry categories using black and white plastic bags. However, enforcement and public participation have been limited so far.

After Phnom Penh, Sihanoukville generates 700 tonnes of waste daily, while Siem Reap generates 380 tonnes. To address this, Sihanoukville introduced a new landfill in 2021, with potential expansion to 50ha in the future. Additionally, the RGC, Asian Development Bank (ADB), and World Bank have collaborated to construct six more landfills in the provinces of Siem Reap, Kep, Kampong Chhnang, Pursat, Battambang, and Kampot in 2022 and 2023.

**Municipal Solid Waste Composition** 

by Type in Phnom Penh

ADB also approved a \$180 million loan in 2021 to improve urban infrastructure and competitiveness in the cities Bavet, Kampot, and Poipet through the Livable Cities Investment Project, benefiting over 140,000 residents with better wastewater and waste management services.

#### Waste Sorting and Recycling

Only a few local NGOs and businesses currently process waste by recycling, but private sector initiatives are sparse due to a lack of incentives. Cambodia's recycling sector is thus underdeveloped, with limited large-scale waste treatment facilities. As a result, only 6.4% of the total 222,440 tonnes of recyclable waste collected in 2022 were recycled in the country, most of which being plastic waste (95%). Most of the remaining 93.6% is exported to neighboring countries, for which limited data is available.

Chinese investments in particular have initiated plastic and textile recycling projects, but nevertheless sell the recycled materials outside Cambodia, primarily to China. The recycling sector still heavily relies on informal waste pickers who often live in very difficult conditions below the poverty line (\$2.7/day). The capital alone accounts for 3,000 of these informal workers, also called edjai, who roam the streets gathering recyclable materials. While the RGC would like to transition rapidly to a fully formal waste sector, little attention is paid to the waste pickers' future. The creation of a Cambodian Waste Pickers Association is currently under study.



Source: Ministry of Environment, 2022 based on study from The Asia Foundation / Institute of Technology Cambodia in 2017

Overview of non-organic recyclables estimated to have been collected in 2022 in Cambodia



Source: Ministry of Environment, 2022

# Managing waste in different sectors

#### Construction and Demolition Waste (C&D)

The construction sector is an important pillar of the Cambodian economy and continues to grow. Effective management of construction and demolition waste (C&D) is still developing. Some waste is collected, treated, and disposed of by the informal sector on a contractual basis, some is sold to buyers for reuse (soil, rubble and rock), while other waste is dumped on open land or in remote public areas.

Waste from metals is also increasing, fueled by steel imports due to the growth of private housing projects and Borey construction. In this context, Hong De Sheng Steel Co., Ltd., a Chinese company, invested \$17 million in a steel processing plant in Oudong district, Kampong Speu province. The plant is operating since 2021 using steel waste and scrap metal to produce – at full capacity – up to 500,000 tonnes of different kinds of steel products annually.

#### Industrial Waste

Volumes of industrial waste in Cambodia have been steady over the last few years. In 2022, industrial solid waste generation was estimated at 130,285 m<sup>3</sup> per year, with 60–70% being textile waste from the garment industry. Sarom Trading, a private company licensed by the MoE in 2002, collects, transports, and disposes of industrial waste in Phnom Penh and Kandal Province using its own disposal sites. Since 2019, Chip Mong Ecocycle, a business unit of Chip Mong Insee cement corporation, provides a waste disposal solution for hazardous and non-hazardous industrial waste in Cambodia. It is using waste from mainly industrial sources for co-processing in a cement kiln to thermally treat and destroy industrial waste with Zero Residue to the environment. Their plant in Kampot Province can handle up to 150,000 tonnes of industrial waste per annum. Chip Mong Ecocycle collaborates with over 100 factories nationwide to source and manage industrial waste.

Outside of Phnom Penh and Kandal Province, factories mostly subcontract local companies for industrial waste management, but these companies often lack the capacity to provide high-quality services. Waste is typically not treated and is often mixed with other waste types at the final disposal site.

#### **Plastic Waste**

Of the little waste Cambodia is able to recycle in the country, plastic constitutes the vast majority. Local private sector initiatives include Man Wah Cam Star Plastic, a company in Bavet city that re- and upcycles used PET bottles into soft polyethylene staple fiber for export to China, where it is used for industrial purposes. Another company called UNG SOK TRY Co. Ltd is processing 60 tonnes of PET bottles per day in Chbar Ampov district, Phnom Penh. Similarly, a joint venture between Phnom Penh Special Economic Zone (PPSEZ) and the Japanese company GOMI, called Gomi Recycle, has collaborated with the Japan International Cooperation Agency JICA to establish a plastic recycling factory in Svay Rieng province. In Phnom Penh, the company molds plastic waste into benches, cases, and tiles on a small scale. As another example, local company Eco-Bricks collects 5 to 10 tonnes of plastic waste monthly, downcycling it into bricks for construction purposes.

Similar initiatives are carried out by the NGO sector, such as Tonle Sap Green Bricks by the Bamboo Shoot Foundation and My Dream Home in Siem Reap province. In Sihanoukville, the NGO Tontoton collects and sorts low value and non-recyclable ocean bound plastic, which is shredded and turned into either floorboards, or sent to serve as fuel in cement kilns. Phnom Penh-based Trash is Nice turns plastic waste into coasters for local restaurants.

So far all these initiatives work a small scale and their impact on the sector is very limited. Once government reforms are implemented and incentives for separate waste collection and treatment are put in place, the sector will become more interesting for local and international recyclers.



Cement kiln co-processing plant by Chip Mong Ecocycle

#### Hazardous and Medical Waste

Hazardous waste generation is increasing due to industrial sector growth and demand for materials containing hazardous substances. Sarom Trading also handles hazardous waste collection and disposal in Phnom Penh and Kandal Province. In other regions, general waste is often mixed with hazardous waste. Many factories do not conduct proactive waste segregation at source, and hazardous waste therefore often ends up in open dump sites. To help mitigate this problem, Chip Mong signed a Memorandum of Understanding (MoU) with the Ministry of Environment in 2021 to sustainably dispose of hazardous industrial waste in Cambodia as well. It currently operates a hazardous waste storage facility in Kampot province with a capacity of 1,100 metric tonnes.

Similarly, the amount of medical waste is increasing as the healthcare sector expands, especially in Phnom Penh, where healthcare services are concentrated. However, despite the 34 incinerators operating across the country (five of which opened in 2022), medical waste often ends up in landfill sites as it is commonly mixed with general waste. For instance, the amount of medical waste dumped at Dangkor landfill is estimated to be 2 m<sup>3</sup> per day. At the peak of the COVID-19 pandemic, this figure rose to 20 tonnes per day. In Phnom Penh, medical waste is managed by the Medical Waste Management Unit (MWMU) of the Cambodian Red Cross

Branch in Phnom Penh, which was established in 2009 for waste collection, transportation, processing, and final disposal services from the healthcare facilities.

In 2021, the Ministry of Health collaborated with UNDP on training healthcare workers to manage infectious waste and wastewater with financial support from China. In 2022, it also received a \$3 million grant from JICA to enhance infectious waste management by funding the installation of additional medical waste incinerators at 29 public health facilities in 10 provinces.

#### E-Waste

Cambodia's consumer economy has led to a significant increase in e-waste, including TVs, PCs, refrigerators, air conditioners, batteries, and washing machines. Valuable waste components are collected and exported, often from open dump sites, whereas non-valuable waste is disposed of in landfills. In a recent development, batteries and selected electronic waste is now being collected in disposal bins by the MoE in partnership with Ecobatt Energy Cambodia, focusing on Phnom Penh with 40 additional bins in other provinces. The batteries are exported to Spain and South Korea, but Ecobatt is looking for partners to accept other electronic waste as well. As of February 2023, approximately 7 tonnes of electronic waste have been collected, representing only a tiny fraction of the estimated 27,112 tonnes of e-waste generated each year.



Transport of collected cardboard waste

## Policy and regulation

Cambodia's Law on Environmental Protection and Natural Resource Management (1996) defined the MoE as the leading agency for formulating policies, issuing regulations, and coordinating waste management and pollution control actions. Current regulations assign the responsibility for waste collection, transportation, and disposal to municipalities and provinces. Sub-Decrees No. 36 (1999) and No. 113 (2015) outline the authority of districts and municipalities in managing waste, including collection, transportation, recycling, minimization, and dumping. Initially, the provincial level oversaw MSW management, but the Cambodian government was encouraged to involve municipalities due to their broader responsibilities.

In 2016, Sub-Decree No. 16 was implemented to prevent disposal of electronic waste in rivers or dumps, imposing penalties on

individuals and businesses. Since 2017, Sub-Decree No. 168 requires supermarkets and shopping malls to charge customers 400 riels (about \$0.10) per bag to manage plastic bag usage. Since then, no major change has been observed in Cambodian practices. In fact, Cambodian people are still using on average 2,000 plastic bags annually. A sub-decree on plastic management is to be published by the end of 2023.

Currently, no specific laws or policies address construction and demolition waste. However, Sub-Decree No. 113 (2015) on Urban Solid Waste Management provides guidance on treating and disposing of C&D waste. The sub-decree includes a clause outlining the responsibilities of C&D waste generators for transportation and disposal, which can be subcontracted or self-performed. However, so far, no initiative has been implemented to treat C&D waste. Hazardous waste management, including medical waste, will be addressed in a Sub-Decree currently in preparation by the MoE.

Sub-Decree No. 124 has provided tax incentives for small and medium-sized enterprises in priority sectors since October 2018, including waste processing for the tourism industry. Authorities exempt some suppliers from value-added tax, following the 2017 Law on Financial Management, covering both services and goods. However, the use of economic incentives and self-regulation instruments has so far not been implemented to any significant degree. Many factories have no internal policy on waste management and there are no specific incentives available for companies that wish to develop initiatives to implement a Reduce, Reuse, Recycle (3R) strategy. Sub-Decree No. 139 from mid-2023 on the Implementation of the Law on Investment (promulgated in October 2021) did not introduce new incentives.

Going beyond existing laws and regulations (sub-decrees), the Cambodian government has recently also adopted a number of high-level policies and strategies for waste management. Despite not having the same legal force, they provide ambitious long-term goals which can only be achieved with sufficient funding:

In 2021, the government released the Urban Solid Waste Management Policy 2020–2030, aligned with the Rectangular Strategy Phase IV. The policy aims to achieve environmental sustainability and address climate change. It has set the goal for all 'urban solid waste' to be sorted, packaged, stored, cleaned, collected, transported, used, and recycled by 2030.

Cambodia's updated Nationally Determined Contribution (NDC) from 2020 in the framework of the Paris Agreement sets ambitious waste management targets. This includes increasing the share of waste disposed at sanitary landfills, implementing source separation and composting for at least 10% of all MSW, producing refusederived fuel (RDF), and implementing the National Reduce, Reuse, Recycle (3R) strategy that was adopted in 2008 already.

In June 2021, the National Council for Sustainable Development (NCSD) and the MoE, with support from Sweden, Japan, and UNDP, also launched the National Circular Economy Strategy and Action Plan, as well as a platform to engage the private sector in the transition towards a circular economy. Through its implementation, a reduction in waste disposal needs may be observed in the years to come.

Overall, several regulations, guidelines, and initiatives have been developed over the past two decades. However, the lack of monitoring, funding, private incentives, implementation, and enforcement capacities remains the major challenge that impacts business opportunities. As a result, improvements in waste management have been relatively slow, with private companies and investors lobbying for better governance to boost this sector.

#### **Best Practice**

Strengthening Reduce, Reuse, Recycle (3R) to Preserve Marine Biodiversity (3RproMar) in the ASEAN region

Implemented by the German development agency Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH, the 3RproMar project supports Cambodia, Vietnam, the Philippines, and Indonesia in reducing land-based waste leakage into oceans. In Cambodia, the project is implemented in collaboration with the MoE and covers three main components: measures for national policies, private sector engagement, and pilot projects. At policy level, the project focuses on a sub-decree on single-use-plastic products, an extended producer responsibility (EPR) scheme, and a guideline on zero waste communities. The private sector also plays a key role in this project by developing joint solutions in promoting circular economy approaches to reduce plastics consumption and prevent plastic pollution starting from the source and along the value chain. Pilot projects include, for example, a successful local management scheme on the island of Koh Trung, Kratie Province. It entails the provision of a small collection vehicle (tuk-tuk), permanent and temporary waste recycling banks, a storage facility, and centralized as well as home compost units.

### **Business opportunities**

Cambodia's tremendous backlog demand in waste management offers a huge range of business opportunities. Germany is regarded as an international leader in successful waste management and recycling. Several German companies already operate businesses in the waste management sector in Southeast Asia, such as ALBA Group and Remondis.

Ambitious objectives, such as implementing the 3R principles, require expertise, modern equipment, and efficient processes for waste collection, as well as sorting, disposal, and treatment – the latter encompassing biological, physical, and thermal techniques. It also involves reducing landfill usage, establishing recycling systems, and ensuring emission protection, landfill monitoring, and aftercare. This presents business opportunities for German and European planning and consulting agencies, as well as technology and equipment suppliers. However, competition is high due to suppliers in the region, including China, Japan, and Korea.

Business opportunities also arise from the development cooperation initiatives of major development banks such as the World Bank, the ADB, and other international donors. In areas where German companies have a key technological position, they also hold an important position in Cambodian tenders.

Specific opportunities lie in the following areas:

#### Waste-to-Energy

For specific types of industrial waste, and other waste sources with high calorific values, waste-to-energy can provide efficient solutions. Germany and Europe have advanced waste-to-energy facilities and import waste to supply fuel to plants. However, waste-to-energy in Cambodia has so far only been tackled by their Asian competition. The most successful example of waste-to-energy in Cambodia is the co-processing plant by the aforementioned Thai-Cambodian joint venture Chip Mong Insee Cement Corporation. In a recent initiative from December 2022, the RGC approved a South Korean firm's proposal to study the potential for waste-toenergy solutions. The Council for the Development of Cambodia, along with the Ministry of Mines and Energy (MME) and PPCA, will facilitate the new study. Similarly, in March 2023, PPCA received a new proposition from Mizuda Group to invest in a waste-to-energy plant in Phnom Penh.

However, in the past years, Chinese investment companies had already discussed building waste-to-energy plants in Phnom Penh, Sihanoukville and Siem Reap with high-level officials. Due to difficulties in allocating suitable waste as feedstock (quality and quantity) as well as financing waste collection through end-consumer payments, all those initiatives were eventually abandoned, despite the initial support of the Cambodian Government.

#### **Industrial Waste Recycling**

The recycling infrastructure in Cambodia is underdeveloped with very limited recyclers and mainly down cyclers in the country. Due to an increased awareness of this topic and the relatively untapped market in Cambodia, recyclers from the region are interested to either source textile waste from Cambodia or set up their own textile waste sorting and recycling facilities here. Plans are underway to develop a business case for advancing textile waste recycling in the country. The project "Fostering a Sustainable Textile Industry in Cambodia" (FABRIC) by German development agency GIZ is paving the way for identifying and strengthening initiatives in this sector. This is done by facilitating technical dialogue on working level around circular economy issues, as well as through provision of technical advice on the implementation of a pilot project for recycling industrial textile waste. Sector Brief Cambodia: Waste Management



Dangkor Landfill in Phnom Penh

#### **Organic Waste Composting**

Few solutions exist across the country to recycle organic waste. There are for example composting facilities in Phnom Penh (TwinAgri), Battambang (COMPOSTED), or Kampong Chhnang (Junlen Farm), but also innovative solutions such as Ruy Reach, a start-up recycling food waste using black soldier fly larvae. A new composting facility is currently under construction in Sotr Nikum district, Siem Reap province as part of program led by GIZ and the GRET Cambodia called "Improving public service delivery for citizens in Cambodia". The facility aims to turn organic waste into premium fertilizer by using earthworms in partnership with local farmers and authorities.

Composting is more cost-effective than anaerobic digestion, but financial incentives are lacking. The hospitality sector is likely to be interested in collection services for their organic waste for composting. Profits could be achieved if waste-generating companies can be motivated to sort waste at the source and pay collection fees.

#### Logistics for Specific Waste Types

Opportunities exist to provide logistical services for companies processing different types of waste. Several projects are being developed to profitably recycle or process certain types of waste, but they lack the expertise or vehicles required for collection and transportation. For instance, Chip Mong Ecocycle is planning to open a tire recycling factory, but they have yet to find partners for subcontracting logistics.

#### **Plastic Waste Recycling**

Given the limited plastic recycling capabilities outlined above, specialized European companies have an opportunity to operate in Cambodia with little competition. The need for large scale plastic recycling facilities will further increase when neighboring Thailand and Vietnam will ban plastic waste imports by 2025. So far, recyclable plastic is often collected by informal waste pickers and sold to these neighbors via middlemen.

More German companies can contribute to recycling Cambodia's abundant plastic waste, possibly taking inspiration from organizations such as COMPED, a Cambodian NGO. It collects plastic waste in Battambang with a catamaran funded by One Earth – One Ocean, a German organization. The plastic waste is recycled into granules for export. Other ideas – albeit at very small scale – include converting plastic waste in Cambodia into asphalt concrete for road construction, as proposed by the Japanese company IKEE Co., Ltd. A successful prototype of modified asphalt from plastic waste was tested in 2023 at the Institute of Technology of Cambodia with the support of UNDP and the Embassy of Japan.

#### Hazardous and Medical Waste Recycling

European companies specializing in hazardous and medical waste recycling can expand their operations quickly due to limited competition. As of today, Bun Leang Ly Global is the only company that builds and operates medical waste treatment plants in 6 provinces. After the awaited release of the sub-decree on hazardous waste, companies should seize the opportunities to bring recycling technologies to Cambodia – besides incineration also encompassing steam-based treatments such as autoclaving, microwave and frictional heat treatments, which can sterilize infectious and sharp medical waste by subjecting it to moist heat and steam. This can be combined with mechanical processes like mixing, grinding, and shredding.

#### E-Waste Recycling

E-waste collection and recycling are still very limited in Cambodia. However, given the current digitalization of the economy and the rise of the electric vehicle sector, it is forecasted that the amount of e-waste will grow in the coming years. Beyond the collection of recyclable materials from e-waste by informal waste pickers, private sector initiatives are starting to highlight potentials for European investors. Setting up a specialized e-waste recycling plant or EEE repair factory is one of such possibilities. Successful examples of this include Asia Data Destruction and Circular Digital Lab Cambodia which both offer a second life to decommissioned electronic equipment, while Ecobatt Energy Cambodia started a reconditioning process for used car batteries.

#### **Second-hand Machinery**

Trading second-hand machinery for the waste sector also has potential in the country. As new machineries found in Europe are mostly too expensive for developing countries, Cambodia can be a destination to put them to good use. For example, waste collectors in cities such as Siem Reap employ second-hand waste collection trucks due to budgetary constraints, but there is also demand for other equipment, including used waste compactors, recycling machinery, and waste sorting plants in the country.

#### **Digitalization and Data Management**

Like all economic sectors, waste management will need to achieve digitalization. The first steps have been initiated with a national platform for SWM and a mobile app called SAMRAAM, aiming at giving every citizen access to collection schedules, live tracking, bill payment, and reporting. European companies and start-ups specializing in such digital services could seize this opportunity to offer their products and technologies.

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