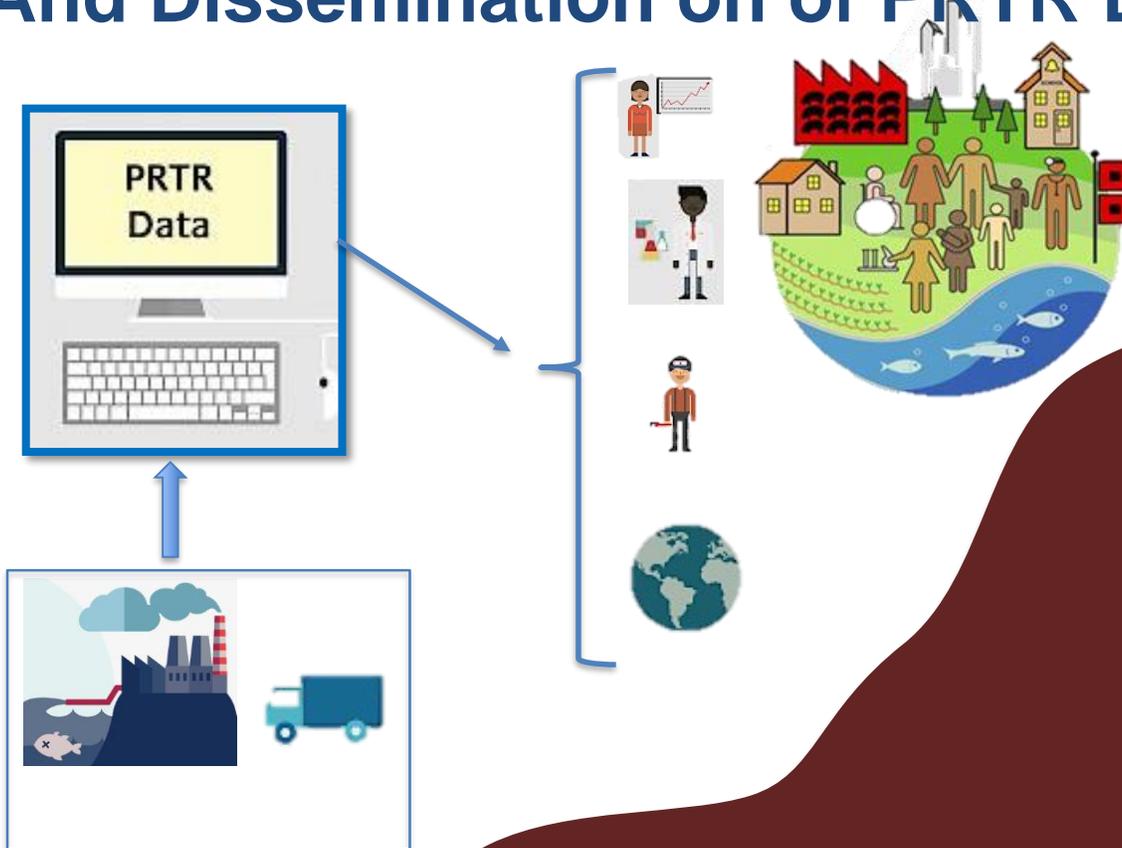




Kingdom of Cambodia
Nations King Religions

Ministry of Environment
General Directorate of Environmental Protection

National Strategy for Public Access to Environmental Information And Dissemination on of PRTR Data



Project Coordination Unit (PCU)
Global Project on the Implementation
of PRTRs as a Tool for POPs Reporting,
Dissemination and Awareness Raising for CAMBODIA
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General Directorate of Environmental Protection, Ministry of Environment- Pollutant Release and Transfer Register (PRTR)

This national dissemination strategy was prepared in March 2017 as part of the project “Global Project on the Implementation of PRTRs as a tool for POPs reporting, dissemination and awareness raising for Belarus, Cambodia, Ecuador, Kazakhstan, Moldova and Peru”, Kingdom of Cambodia, Ministry of Environment was jointed the project. The project was financed by the Global Environment Facility (GEF) with in-kind contributions from the Royal Government of Cambodia for the Pollutant Release and Transfer Register as POPs reporting. The United Nations Institute for Training and Research (UNITAR) served as the implementing agency.

This national Strategy was made through the consulting workshop taken on PRTR Training Sessions and National Workshop on Draft of National Executive Proposal and Practical uses and Dissemination Strategy of PRTR Data by UNITAR’s expert Mr. Andrea CARARO supports UNITAR’s Chemicals and Waste Management Programme by coordinating the Pollutant Release and Transfer Registers (PRTRs) portfolio, and Mr. Jorge OCANA Manager of the CWM Programme in UNITAR, with the national coordinator; Mr. UON Sokunthea, national coordinator and Mr. Phet Pichhara, Project Director and Director of department of hazardous substance management, Ministry of Environment through consulting with national stakeholder, NGOs and private sector. The national strategy was prepared by the national consultant from Ministry of Environment, **Mr. Sophal Laska** assistance with the preparation and review were made by **Mr. Andrea CARARO**, expert of UNITAR.

This national strategy contributes to the Global Project on the Implementation of PRTRs as a tool for POPs reporting, dissemination and awareness raising. The Kingdom of Cambodia is a party to the Stockholm Convention, a legally binding instrument to achieve reduction and where possible the elimination of 12 initial POPs and 10 newly listed POPs.

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List of Abbreviation

CSO	: Civil Society Organization
FASMEC	: Federation of Association for Small and Medium Enterprises of Cambodia
GEF	: Global Environmental Facility
GMAC	: Garment Manufacturers Association in Cambodia
HSMD	: Hazardous Substance Management Department
ILO	: International Labor Organization
MAFF	: Ministry of Agriculture, Forestry and Fisheries
MB	: The Mlup Baitong Organization
MIH	: Ministry of Industry and Handicrafts
MOC	: Ministry of Commerce
MOE	: Ministry of Environment
MOH	: Ministry of Health
MOI	: Ministry of Interior
MOLVT	: Ministry of Labor and Vocational Training
NGOs	: Non-Governmental Organizations
NIP	: National Implementation Plan
POPs	: Persistent Organic Pollutants
PRTR	: Pollutants Release and Transfer Register
SAICM	: Strategic Approach to International Chemicals Management
SMC	: Sound Management of Chemicals
UNDP	: The United Nations Development Programme
UNEP	: The United Nations Environment Programme
UNIDO	: The United Nations Industrial Development Organization
UNITAR	: The United Nations Institute for Training and Research

1. Introduction

Hazardous chemical substances are released every day into the environment from operation of industrial installations and other sources that can pose adverse impacts on human health. In order to protect human health and the environment from harmful chemical substances, providing and enhancing public access to specific environmental information will enable public participation in decision making on environmental issues as well as contribute into the environmental pollution prevention and reduction.

A Pollutant Release and Transfer Register (PRTR) is a publicly accessible database of hazardous chemicals or pollutants released to air, water and soil and transferred off-site for treatment or disposal. It brings together information about which chemicals are being released, where, how much and by whom through effectively record these pollutants and make it available to the public.

Cambodia considers Pollutant Release and Transfer Register (PRTR) as a key tool to provide the public with data regarding the amount of harmful chemicals and pollutants released to air, water and soil and transferred off-site for treatment in order to make informed decisions.

In the framework of the global project coordinated by UNITAR, UN Environment with the financial support of the Global Environment Facility (GEF), Cambodia is implementing a national PRTR system. The project coordination unit (PCU) within the Ministry of Environment, is responsible of the national implementation and accountable of providing information regarding the role of relevant stakeholders in implementation of PRTR including reporting from operation industrial installations and public access to hazardous chemicals information includes releases to air, water and soil as well as transfers of pollutants/waste to treatment and disposal sites.

2. Methodology

The preparation of PRTR dissemination strategy is done through comprehensively study on existing documents regarding the chemical management in Cambodia in related sectors including agriculture, industry, health, as well as public perception of chemicals risk and its effects on environment and human health. The review was done focusing on:

- General situation on chemicals management in Cambodia, including key stakeholders to chemicals management, gaps and challenges in the current chemicals management system, and status of public awareness on chemicals and existing mechanism on raising public awareness on chemicals in Cambodia,
- PRTR system including the benefit of PRTR system to the government, industries/private sectors, civil society, academia, and the public
- The previous implementation of PRTR related activities in Cambodia, etc.

3. Chemical Management in Cambodia: Gaps and Challenges

Cambodia still has limited capacity to properly implement sound management of chemicals due to limited human resources and expertise, lack of a legal framework, and lack of coordination mechanisms at national level. These related problems could be listed here:

Table 1: Gaps and Challenges in Chemical Management

No.	Gaps and Challenges	
1.	Legal tools and enforcement	<ul style="list-style-type: none"> • Fragmented nature and incomplete legislative coverage of chemical management issues which results in coordination gaps between responsible agencies and unclear implementation requirements; • Lack of compliance promotion, enforcement training and capacity that has fostered increasing of uncontrolled chemicals on the market, • Lack of legislation/regulation defining obligation of industry to publicly report about the chemicals use, waste generation, etc., and • Limited legislation on occupational health and safety which clearly state the monitoring on effects, use of personal protected equipment, training on safety, procedure and reporting of the hazards.
2.	Awareness of Chemicals Hazards and Proper use	<ul style="list-style-type: none"> • Lack of awareness (on hazards & safe use of chemicals) for farmers and industry workers who are required to use chemicals in their work as well as for public at large; • Awareness raising to public and stakeholders about the basic knowledge of chemical substances in order to promote the safe use of chemicals, stop the import of banned chemicals, improve the safe control on chemical substance used in their entities, • Limited notification and labelling of chemicals in Khmer language
3.	Capability in Chemicals Assessment and management	<ul style="list-style-type: none"> • Insufficient ability for chemicals assessment and the identification of chemicals-related problems in the production, trade, storage, use, and disposal of such chemicals; • Lack of human resources as well as technical expertise in analyzing chemicals, chemicals risk and hazards, and chemicals pollution management, • Lack of reliable laboratories and equipment for chemicals monitoring and analyzing, and cooperation among laboratories is very limited, and • Lack of appropriate waste disposal options for chemical-intensive sectors
4.	Coordination Mechanism and information sharing	<ul style="list-style-type: none"> • Lack of mechanism for information exchange among relevant institutions/organizations for chemicals management, • Limited available national information related to chemicals import, storage, use and disposal to be publicly accessed, • Lack of systematic, technical and proper chemical data management system owing to lack of expertise and limited financial resources, • No clearing-house mechanism for sound management of chemicals include PRTR system, where chemicals data and information

		related issues are collecting, analyzing, recording, and disseminating,
5.	Participation from private sector	<ul style="list-style-type: none"> Lack of private sector responsibility and stewardship in terms of following required registration procedures, providing appropriate hazards information and labelling of the chemicals they supply, prior to placing them on the market, and reporting amount of wastes generated and releasing media;

4. Pollutants Release and Transfer Register (PRTR)

4.1. What is PRTR System?

PRTR is a system that could be defined in general as a public accessible, online database containing various information from both point-sources and diffuse sources of pollutions, about the chemical substances or chemicals products, as raw materials, used in the production, and the pollutants or toxic substances released into the environment (air, water or soil), or transferred to other sites in the form of wastes in order to be treated or to disposed of. From these reported data useful environmental information could be produced and then used by the government, the public and all interested stakeholder who should be granted free access to PRTR data.

A PRTR can be an important tool in the development of environmental policies of a government, providing information about emissions and releases of pollutants that would be otherwise difficult to obtain, encouraging reporters to reduce pollution, and engendering broad public participation and awareness. Indeed, governments may wish to achieve national environmental goals to promote sustainable development and then use PRTR as an important tool to monitor how these goals are achieved. The development and implementation of a PRTR system adapted to national needs represents a means for governments to track generation, release and transfer of various pollutants over time and with geographical reference.

4.2. Why is PRTR system needed?

PRTR system has been used or developed in many countries. The overall goal for developing or having this system is to increase the reduction of harmful effects of chemical substances on human health and environment, and also to enhance the implementation the agenda 21 principle 10 that stated about the public’s right to access to information related to environment.

The specific objectives of the national PRTR of Cambodia can be identified as the following:

- To reduce the harmful effects on human health and environment as results of pollutants that are released and transferred;
- To have comprehensive information of chemicals or chemical substances that need to be regulated and reported under some international environmental conventions;
- To identify the environmental pollution, including air pollution, water pollution, soil pollution and pollution as result of disposal of hazardous waste, and the pollution sources;

- To mitigate the global environmental issues such as GHGs emission, ozone layer depletion, etc.;
- To promote the cleaner production to help in reducing the amount of generation waste and to save the raw materials;
- To encourage and enhance the monitoring on imported, produced and distributed products;
- To increase the monitoring and preventing the pollution through the evaluation on effectiveness of law enforcement;
- To increase the synergy of existing data collection and reporting mechanism;
- To increase the participation of the public in decision making related to environmental policy;
- To disseminate the information related to chemicals risks inside the country and outside the country; and
- To reduce cost in environmental protection through the reduction on raw materials loss and expense on monitoring on and treatment and disposal of waste.

4.3. Benefits of PRTR system

PRTR system can benefit different stakeholders ranging from the government to industries and the public/civil society:

❖ Government

Chapter 19 of Agenda 21 identifies information gathering and dissemination about chemical emissions as a basic element for the sound management of chemicals and specifically advocates the establishment of national emission inventories. This can most usefully be done through the development of reporting systems, which include emissions from chemical factories in the totality of emissions from industry and other sources. Therefore, the development and implementation of a PRTR adapted to national needs will assist governments to track the generation, release and fate of emissions of hazardous chemical substances and pollutants over time, to examine progress in reducing emissions and to set priorities for reducing or even eliminating the most potentially damaging pollutant releases and transfers.

Government can benefit from establishing and implementing a PRTR including:

- PRTR system will provide data and information that will enable government to monitor progress on pollution or chemical reduction policy and indicate trends over time. Information on emissions of materials can help governments to design an efficient management regulatory framework.
- Government can also use emission information to develop strategies for substances, industries or regions that require the most attention. PRTR data can be used to monitor progress towards targets and commitments to international environmental agreements and conventions.
- PRTR can provide data about accidental releases such as spills or emissions from a fire at an industrial facility. Register results can also be used to plan for possible emergencies

by providing insight into the kinds of releases that may occur under emergency circumstances.

- PRTR data and information can be used for assessing risks to human health and the environment as input to dispersion models to simulate emissions and any subsequent pollution.
- PRTR can help pin-point priority candidates to introduce technologies for cleaner production. PRTR results can be used to help direct research and development for pollution prevention, recycling, recovery and reuse technologies. It can also indicate where technology transfer might be most useful
- PRTR can help pollution prevention and lessen the burden of control regulations requiring monitoring and enforcement actions. It can also provide useful information for land-use planning activities and in the licensing potential sources of pollutants.

❖ **Private/Industrial Sectors**

Industrial sector and economic operators should be prevented to have erroneous perceptions of PRTR as an additional reporting and administrative burden. The experiences from worldwide implementation of PRTR in the private sectors in different countries showed that PRTRs are a very important tool to provide key information on productions processes and help to minimize costs and improve efficiencies. Industries can benefit of PRTR reporting as follow:

- Advantage of improved management of chemical substances:
 - Providing information of level efficacy of raw material using and resources supporting in their production such as: chemical substance, water, electricity, and fuel;
 - Identifying equipment leak and other inefficiencies that waste raw material and resources in their production system;
 - Alerting level of losing raw material or resources supporting production through releasing into environment and lost in semi-product and waste;
 - Monitoring their production management such as: raw material, semi-finish product, and final product respect to the technical or not;
 - Identifying type and waste quantity of their production and emission which transfer into environment;
 - Accessing information in production management, raw material, and waste which improve environmental quality by prevent pollution in their industry and reduce waste increasingly. Additionally, the industry gain benefit from expend reduction on losing raw material, water, and disposal especially they can improve manufacturing processes and reduced point source and fugitive emission into environment.
- Benefits of employees' education on chemicals management:
 - Raising the knowledge of not only those who handle chemical substances but also other employees, on the handling and release of chemical substances by giving them information on the released quantity, etc. of chemical substances assessed through PRTR and training on the management status, safety, etc. of the chemical substances they handle;
 - Encouraging employees to handle chemical substances more carefully, thus enhancing awareness of handling and safety

- Benefits of a better communication with local communities:
 - Communicating with local communities by setting up a forum to explain the PRTR data and status of chemical substance management.
 - Through the efforts to protect the environment, people will learn to trust the industries, leading to better relations between the two. It is essential for businesses to communicate with communities to enable the locals to understand their environmental policy and measures taken, and to learn about chemical substances handled
- Boosting the business image when businesses win the trust of local communities.

❖ **Public/Civil Society**

Public and civil society participation in PRTR is important because they help spread messages. They can also benefit from supporting a national PRTR.

- The public can use PRTR information to learn about releases and transfers occurring in their communities and to become better informed about the environmental performance of individual facilities, economic sectors and government regulatory agencies
- PRTR can also stimulate public to ask questions of and to seek improvements to human health and environmental well-being.
- Non-governmental organizations can both use and disseminate PRTR data to reflect their individual purposes and goals.
- Researchers and academics can use PRTR data for modelling or other studies, and the financial sector for evaluating investment proposals or for considering insurance or sustainability issues.

4.4. Key Stakeholders to PRTR System

The success of the Pollutant Release and Transfer Registers implementation requires participation, coordination and cooperation from all stakeholders. The main stakeholders in implementing PRTR are government, industry, academia, civil society, and the general public. Key roles of stakeholders in supporting the implementation of a national PRTR system are described in the table below.

Table 2: Roles of Key Stakeholders to PRTR System

No.	Stakeholder	Role of Stakeholders
1	National Government	<ul style="list-style-type: none"> • Developing policy and legislation related to PRTR system, • Developing and implementing a PRTR system, • Providing education to industries, local government and lower level institutions • Keeping records and maintenance overall database and information, • Organizing and summing up the data of released quantities submitted by businesses, • Estimating the quantities released from households, farms and automobiles,

		<ul style="list-style-type: none"> • Publishing data and use them for environmental protection and chemical substances management, • Sharing and dissemination information to the public, • Consulting with institutional stakeholders and coordination agencies, • Monitoring and evaluating the effectiveness of the system
2	Sub-National Government	<ul style="list-style-type: none"> • Raising awareness to the public on the PRTR system, benefits of the system, • Keeping record and data related to environmental pollutions, • Working with civil society and local community/public in monitoring and evaluation the implementation of the chemical substance management by industries, and • Reporting the information concerning the environmental pollution to the central government
3	Industries and Private Sectors	<ul style="list-style-type: none"> • Working closely with national and sub-national government to be able to use the system properly, • Assessing and notifying the quantity of various chemical substances to be released to the environment and report it to the government under the PRTR system • Using the data they have reported to improve the management system, suppress unnecessary release, and reduce raw materials costs,
3	Academia and Research Institutes	<ul style="list-style-type: none"> • Using the PRTR data and information for conducting a scientific research, • Developing more researching documents related to chemicals especially in Khmer language • Improving public awareness on environmental pollution through the published documents, and • Consulting with government in the policy making process
4	Civil Society Organizations (CSOs/NGOs)	<ul style="list-style-type: none"> • Consulting with government in the policy making process • Raising awareness for local communities and general public especially for those where the government could not reach to, • Enabling underserved populations, such as girls and ethnic minorities, gain access to information, • Supporting the government financially or technically in improving the public access, • Helping to build capacity to local government and local authorities, • Monitoring the practice of industries and report back to the government • Conducting a study on the impacts of PRTR system and give back the recommendation to improve the system
5	Public/Local Community	<ul style="list-style-type: none"> • Learning about the release and management conditions of chemical substances through the PRTR data published,

		<ul style="list-style-type: none"> • Being aware of the importance of reducing the use of toxic chemical substances in households, • Reducing environmental risks incurred by chemical substances by improving communication with the government and business on risks
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5. National Strategy for PRTR awareness raising and dissemination of PRTR data

The public awareness of the chemical management, safe use and their related hazards, especially for farmers and industry workers who are required to use chemicals in their work, are very limited. The main reasons behind this are: (i) Chemical information is rarely published in the mass media, which the public could access to, especially in local newspaper, magazine, radio, social network, etc. and (ii) Public forum to discuss about the chemicals related topic is limited.

5.1. Mission

“National PRTR system will undertake the identification, collection, processing, and disseminations of information of environmental pollution in order to facilitate public access to information and enhance awareness and to participate in environmental decision-making that will contribute to the prevention and reduction pollution of the environment.”

5.2. Vision

“Stakeholders will be able to access high quality information and up-to-date data on environmental matters through a national PRTR electronic database or PRTR web-portal and other available media, in order to participate in preventing the environmental pollution and protecting public health.”

5.3. Goal

National strategy for the public access to environmental information and dissemination of PRTR data has been developed that the PCU will enforce at national level to *“enhance public access to information on environmental issues and pollutant release and transfer registers (PRTR) information system in order to increase awareness and promote participation of the public in the process of decision-making on environmental policy-making.”*

5.4. Action Plan

Achieving the above objective requires an action plan presented as following:

1) Promoting public access to national environmental information in a national PRTR web-portal system;

- To develop an online database system where public could access to PRTR information for free
- To establish a PRTR page in Facebook which is the most popular social network, and to update it regularly
- To organize public awareness raising workshop on access environmental information on the established national PRTR electronic database system

- To provide guidance for accessing and using information in the established national PRTR database during the awareness raising workshop
- To disseminate PRTR information to the public through brochures and leaflets, article in local newspapers, magazines, etc.
- To have a PRTR awareness raising program on local radio
- To develop a video clip on the PRTR information and PRTR project in Cambodia

2) Disseminating of quality information of environmental issues

- Provide mapping of sources of emissions through GSI Maps (Facilities locations)
- To build capacity to focal personnel of MoE to collect, process, verify, compile data and disseminate quality information on PRTR databases
- To maintenance and continuous updating of information on the progress of the project, environmental information through the PRTR Website and social media accounts
- Provide aggregate analysis of PRTR data for easy-to-read materials

3) Promoting public participation in decision-making process in environmental issues

- Organize stakeholders consultative workshop on developing a national strategy on PRTR dissemination and public awareness raising
- To organize national forum on environmental protection participated by government agencies, academia, industrial enterprises, NGOs, the media, local communities.
- To establish environmental education campaign for student (e.g. a debate for university student on the topic related to health and environment hazards of improper chemical use and management)
- Create course of study on environmental management, monitoring and estimation of pollutants
- To develop other communication mechanisms for sharing of best practices among industrial sectors and the public
- To conduct monitoring and evaluation of public participation in the decision making-process in the environmental matters

5.5. Expected Outcomes

- Public will be able to easy access to national environmental information on established a publicly accessible national PTRT, print publications, websites and social media.
- Environmental education and public awareness about environmental issues will be increased and well informed
- Quality information of environmental issues will be disseminated to the public through different tools:
 - Brochures of PRTR System in Cambodia
 - Booklet of PRTR chemical factsheet
 - leaflet
 - Poster

- Website
- Facebook page
- Other Social media
- Rights to and transparency in accessing to environmental information will be enhanced
- Public participation in the environmental policy decision-making will be enhanced with better understanding and well-informed of environmental issues made easy to obtain that contributes to environmental pollution reduction and prevention.
- Quality of decisions taken for environmental protection and nature management will be improved

5.6. Timeframe and Estimated Budget

Table 3: Timeframe and estimated budget

Objective	Activities	Outputs Indicator	Responsible Agencies & Cooperating	Estimated Budget (\$)	2018											
					Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec
1. Promoting public access to national environmental information in national PRTR web-portal	1.1 To develop an online database system where public could access to PRTR information for free	Website of PRTR system in Cambodia		GEF: 20,100\$												
	1.1.1 Develop database and web portal															
	1.1.2 Publication of PRTR System															
	1.1.3 Publication to user on information PRTR accessible															
	1.1.4 Publication to user of environmental information and emission data through online system															
	1.2 To establish a PRTR page in Facebook which is the most popular social network, and to update it regularly	- Facebook page of PRTR system in Cambodia		GEF: -3,000\$												
	1.2.1 To establish a PRTR page in Facebook															
1.2.2 To Promote a FB page of PRTR System																

1.2.3 To Promote a FB page of PRTR to user on information PRTR accessible															
1.2.3 To Promote a FB page of environmental information and pollution release emission															
1.3 To organize public awareness raising workshop on access environmental information on the established national PRTR electronic database system in Phnom Penh in 10-May, Svay Rieng in and Preahsihanouk	200 participants evaluation sheet on the public awareness of the PRTR web-portal	PCU- MoE and DoE	GEF: 5,000\$ MoE: 5,000\$												
1.3.1 Phnom Penh	70 participants														
1.3.2 Svay Rieng	70 participant														
1.3.3 Preah Sihanouk	60 participant														
1.4 To provide guidance for accessing and using information in the established National PRTR database during the awareness raising workshop	-1000 participants - Evaluation sheet on understanding of the PRTR web-portal and its benefits	PCU – MoE & DoE	GEF: -4,000\$												
1.5 To disseminate PRTR information to the public through brochures and leaflets, article in local	- Number of brochures, leaflets, article in newspaper	PCU - MoE	GEF: -4,000\$												



5.7. Implementation and Coordination Mechanism

An existing inter-ministerial technical working group can serve as a coordinating group for implementing the PRTR strategic plan for dissemination and public access to information. This inter-ministerial technical working group has recently been updated and now includes 30 members from governmental agencies, NOGs/civil society, private sector and academia.

Ministry of Environment as a chair of this inter-minister technical working group and will be a lead agency in coordinating and implementing national strategy for PRTR dissemination and awareness raising.

5.8. Monitoring and Evaluating of the Strategy

In order to ensure an effectiveness of the implementation of this strategy requires to:

- Undertake regular monitoring of the progress
- Assess the progress against goal and targets, as indicated in Table 3
- Conduct review process with relevant stakeholders and submit to the independent evaluation to the national coordinating group
- Identify the success and failure factors
- Updating the strategy to adjust the situation based on the success and failure
- Applying success cases to other area
- Sending questionnaire to a significant number of people from different regions (big cities, small cities, rural areas) to get some information on the knowledge of PRTRs, if they know about it, if they are interested to have more information, what they know about chemicals, pollutants, are they scared for they health? In this way you can get some statistics on PRTR knowledge to use in the report of the strategy

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