



## Mandatory Liabilities of Exclusive Manufacturers, Importers or Suppliers of Electrical and Electronic Equipment for the Sake of Environmental Safety

### Key Highlights:

- The Ministry of Environment (“**MOE**”) issued Prakas No. 2196/0325 dated 18 March 2025 on the liabilities of exclusive manufacturers, importers or suppliers of electrical and electronic equipment concerning e-waste management (“**Prakas on E-waste Liability**”). The Prakas on E-waste Liability aims to improve the e-waste management practices, reduce environmental impact, and ensure proper handling of e-waste after use.
- This Prakas on E-waste Liability serves as an implementing instrument of Section 2, Chapter 4 (liabilities of manufacturers, importers, or suppliers of electrical and electronic products and hazardous waste) of the Code of Environment and Natural Resources, dated 29 June 2023 (“**Environmental Code**”).
- Under the Prakas on E-waste Liability, the exclusive manufacturers, importers or suppliers of electrical and electronic products are required to:
  - Be liable for the e-waste management;
  - Collect, manage, and treat e-waste after use or disposal. E-waste can be treated by a licensed waste management company or re-exported to the country of origin in accordance with applicable laws of Cambodia;
  - Develop their owned e-waste collection system permitted by the MOE; or cooperate with an e-waste collection company permitted by the MOE; and
  - Report the quantity and types of imported electrical and electronic products and waste collected after use every six months.



## Details:

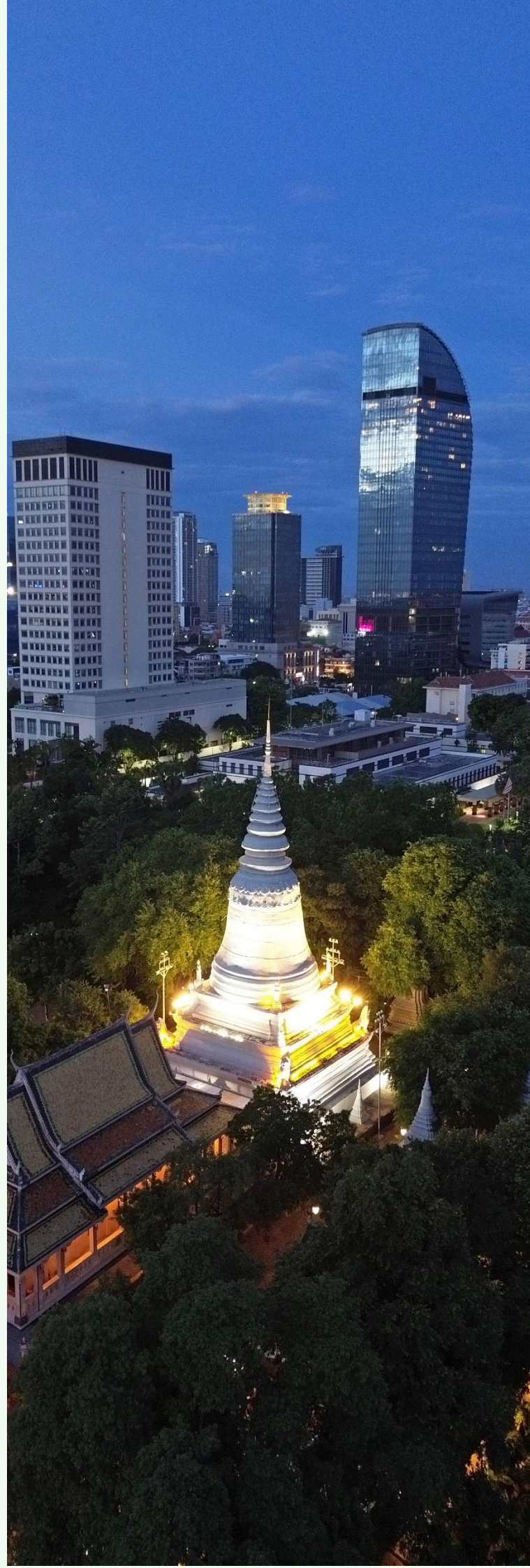
On 18 March 2025, the MOE issued the Prakas on E-waste Liability to determine the liabilities of the exclusive manufacturers, importers or suppliers of the electrical and electronic products covered under Annex I of the Prakas. The electrical and electronic products under Annex I include air conditioners, fridge, printing machines, washing machines for household and commercial services, non-rechargeable batteries, lamps with specific codes (please see details in Annex 1 of the Prakas).

The manufacturers, importers, or suppliers exclusively supplying the electrical and electronic products must establish and implement their own system for proper e-waste collection with prior approval from the MOE. Alternatively, they can cooperate with e-waste collection companies permitted by the MOE for e-waste transportation and storage.

### (i) E-Waste Management:

The Prakas on E-Waste Liability requires the manufacturers, importers, or suppliers of the electrical and electronic products to collect, transport and storing e-waste as the following:

- **Transportation and Storage:** establish mechanism to collect, transport and store e-waste;
- **Sorting and Labelling:** set up waste storage by sorting and labelling waste based on the electrical and electronic products; and
- **Final Storage:** set up a final storage for waste to be treated or to be re-exported to the country of origin.



**(ii) Liabilities:**

- **E-Waste Treatment:** The manufacturers, importers, or exclusive suppliers of electrical and electronic products must be liable for managing and treating the e-waste collected. The waste treatment can be carried out by the e-waste treatment company permitted by the MOE or export to the country of origin in compliance with the applicable laws and regulations of Cambodia.
- **Reporting:** The manufacturers, importers, or exclusive suppliers of electrical and electronic products must submit a report on the details of electrical and electronic products and waste to the MOE for every six months/twice a year.

The report must contain the following information:

- **Imported Electrical and Electronic Products:**
  - product code,
  - product description,
  - quantities, and
  - product weights.
- **Collected E-waste:**
  - details of e-waste: quantity and type of waste and weight of waste;

- management of e-waste: type of waste, service of waste collection; location and date of waste collection; and
- final storage: export and processing.

*The sample report for e-waste collection is outlined in Annex 2 of the Prakas on E-Waste Liability.*

**(iii) Non-Compliance:**

The Prakas on E-waste Liability does not specify any penalties for non-compliance with the mandatory liabilities. However, Article 840 of the Environmental Code states "any person who fail to implement Article 252 (paragraph 1) (obligation of owners of hazardous waste) shall be penalized in imprisonment from one year to three years and subject to a monetary fine from between 100,000,000 Riels (approximately USD 25,000) to 300,000,000 Riels (approximately USD 75,000)."

Further, Article 841 of the Environmental Code also provides "any person who fails to implement Article 253 (permit to discharge hazardous waste) shall be penalized in imprisonment from two years to five years and by a monetary fine from 200,000,000 Riels (approximately USD 50,000) to 500,000,000 Riels (approximately USD 125,000)."

*The information provided here is for information purposes only and is not intended to constitute legal advice. Legal advice should be obtained from qualified legal counsel for all specific situations*

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