

THE ALCOHOL INDUSTRY IN CAMBODIA

A Study of Taxation, Regulation, Distribution, and Consumption of Alcohol



The Asia Foundation

As part of the Preventing Intimate Violence Project

Funded by the Australian Department of Foreign Affairs and Trade

June 2016

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Executive Summary

Violence against women (VAW) is a pandemic, with far-reaching physical, psychological, and economic consequences for women, their families, and societies as a whole. According to the World Health Organization (WHO), South-East Asia is the worst affected region for intimate partner violence (IPV), with approximately 38 per cent of all women in the region affected. In Cambodia, one in five ever-partnered women reported experiencing physical and/or sexual violence by an intimate partner in their lifetime (WHO 2015). Alcohol abuse increases women's vulnerability to violence (TAF 2015).

The Asia Foundation commissioned this research to provide greater understanding of the alcohol industry in Cambodia, particularly the taxation, regulation, distribution of alcohol, and alcohol consumption patterns. This research used multiple research methods to collect qualitative and quantitative data and secondary data analysis to gain insight into the dynamics of the alcohol industry and alcohol supply chains in Cambodia. International and regional strategies to reduce the health and social impacts of alcohol consumption through greater industry regulation, in particular restrictions on alcohol advertising and price controls were examined. This research found that in Cambodia there is little regulation of the alcohol industry including the advertising of alcohol products and very few, if any measures in place to protect consumers.

Most recent World Health Organization (2014) data show that in the last decade alcohol consumption in Cambodia has increased. As per capita income has risen middle class consumption patterns have emerged, particularly in Phnom Penh and other urban centres and alcohol, particularly beer consumption has grown. Alcohol consumption has many detrimental effects on Cambodian society, particularly for women. Alcohol abuse has resulted in more than 60 major types of disease including cardiovascular disease, cirrhosis of the liver, cancer and sexually transmitted diseases including HIV/AIDS (Jamieson, 2012). Alcohol is a factor in many unintentional deaths and injuries. In the first 6 months of 2015 for example, there were more than 2500 alcohol-related traffic accidents (Pang, 2015).

Cambodia has limited alcohol regulations and a particularly weak policy framework for the regulation of alcohol. Although a national law on alcohol -sponsored by the Ministry of Health attempts to regulate the alcohol industry, the law is currently in draft form and moving between the Council of Ministers and the Ministry of Health. The law is yet to be finalised. Questions have been raised about the nature of the relationships between the Government and the alcohol industry and the political-economy of the alcohol industry more generally.

There is no minimum drinking age, no limitations on the sale or advertising of alcohol and Cambodia has some of the lowest taxes on alcohol products in the region. In particular:

1. There is no on or off premise **age limits** for the sale of alcohol although the draft new alcohol law attempts to regulate the legal age for drinking and the purchase of alcohol.
2. There is currently no on or off premise **time restrictions** on the sale of alcohol. At specific times however, such as during national elections or special events such as the King's funeral, alcohol sales are temporarily banned.
3. Although there is a **blood alcohol limit for driving**, enforcement is inadequate.
4. Cambodia has **limited laws on alcohol advertising** and enforcement of the non-legally binding directives that do exist are questionable. For example, the October 2014 directive banning alcoholic advertisement during peak night time television viewing has not been successfully enforced.
5. There are no laws on **alcohol sponsorship or sales promotions**.
6. **There are no legal requirements for health warnings** to be included on alcohol products and advertisements.

Key findings

This study identified four key sets of findings:

1 - Alcohol consumption patterns are highly gendered

Distinctive gendered patterns of alcohol consumption are evident in Cambodia. Men's alcohol consumption significantly exceeds global averages. Even though alcohol consumption levels in Cambodia are below the global average of 6.2 litres per person, Cambodian men consume an average of 9.7 litres per person (Barron, 2014). This is

equivalent to almost six times the amount of alcohol consumed by their female counterparts (ibid). Men reported that they mostly drink for social purposes (43 per cent), for medicinal reasons (20 per cent) and for energy (18 per cent). Women reported that they mostly drink for medicinal purposes (52 per cent), for energy (22 per cent) and for socializing (20 per cent). Although women are not the consumers of alcohol, they often carry the financial and health related impacts of men's alcohol consumption and are the targets of alcohol-related intimate partner violence.

2 - Large producers with political affiliations exist alongside small home-based informal producers

Large local producers and large importers are the main players in the alcohol industry in Cambodia. In this study large producers were defined by the scale of their investment. The largest producers of beer and importers of alcohol products have strong affiliations with the dominant political party - the Cambodian People's Party - through shareholding and relationships at the Ministerial level and with senior government officials. Large producers' can influence new laws and regulations. In practice this means that large producers and government officials, including Ministers and family members of high ranking officials, are involved in various businesses together. Although large producers do have relationships to the senate or assembly, they are not as prominent as relationships at the ministerial level. These insights were gleaned through anecdotal evidence as no large producers agreed to participate in an interview in this study.

There are many small producers who typically operate informally and the production of alcohol constitutes a substantial source of income for their households. For the majority of small producers (60 per cent) interviewed, alcohol production accounted for 40 per cent of their income, whilst for the remaining 40 per cent, alcohol accounted for more than 40 per cent of their income.

The distribution channels of all alcohol producers are relatively simple and well established. Both large and small producers develop their own distribution channels. For large producers, distribution is nationwide whereas for small producers' distribution is generally to local markets and arrangements are quite informal. Large producers leverage sophisticated networks of distributors to get their products to market and provide simple types of financial incentives such as the provision of short term credit and discounts for bulk purchases. Small enterprises and rice wine producers face increasingly stiff competition with more producers entering the market and changing consumer tastes. Most small producers were not aware of the draft alcohol law and therefore had no opinion on whether such a law would impact them.

3 - Regulation of the alcohol industry

To reduce the negative impacts of increased rates of alcohol consumption, greater legal and policy regulation is required. This study examined two approaches to regulation:

1 Advertising restrictions

Advertising is not only a means of reaching consumers and promoting products but also provides an opportunity for government and policy interventions to inform consumers of health risks as well as new laws and regulations. In many countries the content, time, place, and messaging of alcohol advertising is restricted. The effectiveness of such regulations is debatable however, because regulations have not been comprehensively applied across all forms of media simultaneously. As a result, the general population continue to be exposed to significant levels of alcohol advertising even when restrictions are in place and the impact of any one ban is difficult to disentangle.

Secondary data analysis in this study has shown that in ASEAN nations with total bans on beer advertisements on national TV do in fact have lower rates of beer consumption per capita. Countries with no restrictions, voluntary or partial restrictions, have higher rates of beer consumption. Cambodia has no advertising regulations and high levels of beer consumption. Findings on the impact of restrictions on television advertisements on wine and spirit consumption are less conclusive.

Alcohol advertising is a major source of revenue particularly for TV stations in Cambodia. Advertising takes place in all forms - from TV and radio commercials, to print media and sponsorships as well as general merchandising support. TV however, is the dominant form of media and accounts for an estimated 60 per cent of all advertising in the country. Companies use TV as a means to push sales and to increase brand recognition in an increasingly competitive environment. National television is the biggest income source in the advertising industry. It is estimated that in

Cambodia, the total advertising revenue generated from the top ten TV channels reached around US \$100 million per year in 2015, of which beverages, including alcohol, accounted for around 50 per cent (Kunmakara, 2016). Beer advertising increased by 164 per cent in 2011 making it one of the fastest growing areas in the advertising industry in Cambodia. It is estimated that advertising revenues will exceed US \$100 million per year in the coming years.

The Ministry of Information issued a circular on 1 October 2014 to ban alcohol advertisements from 6-8 pm from 1 January, 2015. This circular has not had a significant impact on the advertising industry however. The enforcement of the circular is inconsistent, requires reinforcement and is likely to meet with resistance from the advertising industry. The restriction on advertising during prime-time hours is the only restriction on alcohol companies. In the alcohol industry, in particular, application of directives aimed at the sector and curtailing advertising on TV during peak viewing hours lack enforcement measures or penalties for not following directives. There are no restrictions or regulations for merchandising, promotion and sponsorship.

The replacement of alcohol advertisements with other advertisements is very difficult to achieve. The number of viewers who watch particular programs on TV drives the willingness of sponsors to promote programs. Replacements require more diversified TV programming as greater diversity would provide greater advertising opportunities. In Cambodia, entertainment programs, news and business programs are the most popular TV programs. The development of more educational programming may represent greater opportunities to replace alcohol advertisement, to include educational advertising and promote the safe use of alcohol.

2 Price controls

Cambodia also does not have any price control regulations. Research shows that price control initiatives are very much country specific and need to take into consideration the particularities of society, culture and the general environment in which price controls are implemented. Price control is seen by some as a restriction on individual freedoms and a regressive form of government intervention. Furthermore, there is little solid evidence to demonstrate the impact of price control strategies.

In the Cambodian context price control strategies particularly for the products of large producers warrants a larger and more in-depth study to identify whether or not such policies would reduce the negative social and health impacts of alcohol consumption. There is a clear need to understand the structure of the alcohol market and to think carefully about impact of price controls on business as well as on consumption patterns.

4 - Government revenues from the alcohol industry

The study attempted to calculate revenues from the import of alcohol but limited data are publicly available. The study team conservatively estimated that the Cambodian government would collect US \$30 – 40 million dollars annually from import and related taxes. Total revenues from imported alcohol continue to increase year after year. Informal discussions with importers suggests that taxes and customs duties vary depending on the popularity of particular alcohol products. At present alcohol exports are limited and there were no available data on government export revenues at the time of this study.

1 Study Objectives

Violence against women (VAW) is a pandemic with far-reaching physical, psychological, and economic consequences for women, their families, and societies as a whole. According to the World Health Organization (WHO), South-East Asia is the worst affected region for intimate partner violence (IPV), with approximately 38 per cent of all women in the region affected. The Australian Department of Foreign Affairs and Trade (DFAT) is supporting the Cambodian Ministry of Women's Affairs to change attitudes and prevent violence so that women and girls can feel safe in their homes, in the workplace and in their communities. The DFAT-supported Prevention of Intimate Partner Violence Program (PIPV) seeks to reduce rates of IPV by promoting comprehensive primary prevention strategies and interventions that reduce or eliminate specific risk factors and strengthen or establish protective factors for the prevention of IPV. The Program supports the development of community-based interventions that reduce alcohol abuse as a strategy to prevent IPV.

The Asia Foundation commissioned this research on the alcohol industry in Cambodia to provide greater understanding of the taxation, regulation, distribution, and consumption of alcohol. This research used multiple research methods to collect qualitative and quantitative data and the analysis of secondary data to gain insight into the alcohol industry and alcohol consumption in Cambodia. These data and findings are presented in this report. This research has four key objectives that aim to understand:

- the structure of the alcohol product market including import, export and consumption trends, production, distribution channels, price control, sector financing and regulatory framework;
- tax and import duties, VAT and other special taxes on alcohol products;
- international regulations on alcohol product advertisement; and
- television's revenues from alcohol product advertisement

1.1 Study approach and methodology

Mixed methods were used to collect data that aimed to understand the supply and distribution of alcohol and industry regulation in Cambodia. Key informant interviews with stakeholders and a survey were conducted. Sampling for the interviews and survey was purposive and aimed to provide greater understanding of the supply and distribution of alcohol in Cambodia from the perspective of different Cambodian stakeholders. Stakeholders at all stages of the alcohol supply chain were approached to participate in this research (see Table 1).

Table 1: The alcohol supply chain in Cambodia

	Producers	Importers	Wholesalers	Distributors	Retailers	Consumers
Types identified in Cambodia	Beer and wine factories Formal local production of hard spirits and liquors (e.g. palm wine) or boutique producers Informal home-made rice and palm wines etc.	Hard spirits e.g. whisky, brandy, vodka etc. Wines International brands Informal imports (e.g. Laos beer down the Mekong)	Large stocks Can be wholesaler and distributor	Can be a distributor and retailer or just a distributor	Small family owned enterprises Medium to large expatriate owned enterprises Restaurants Beer gardens etc	Individual consumers of alcohol
Where they buy from	Import raw production materials Value added on to Cambodia produce e.g.	Regional and global supply chains Regional factories and exporters	From producers and importers	From importers and wholesalers	From wholesalers and distributors	From retailers mostly unless large quantities and then from producers,

	Kirel wines and grape farms	Bundling of products at key hubs e.g. Singapore			If large enterprises from importers	wholesalers and distributors
Customer base	Wholesalers, large and small distributors	Wholesaler and distributor of certain volumes Importer owned retail shops Large establishments	Distributors and retailers and on occasion direct to consumers	Retailers but also direct to consumer	Directly to consumers	
Location	Sihanoukville Phnom Penh fringe areas Other provinces	Phnom Penh mostly Major cities	Phnom Penh and other major cities	Mostly situated in major areas of towns and districts.	Urban and rural areas.	Urban and rural areas.

The following stakeholder groups were defined in the following ways and each was invited to participate in an interview. Table 2 shows the sample size achieved for each group.

1. **Large Formal Producers:** Producers with significant in-country investments by Cambodian business people, foreign investors or a combination of both. For example, Khmer Brewery and Angkor Beer. Representatives from this group of producers declined the invitation to participate in this research.
2. **Small Local Producers:** Small producers engaged in the informal production of spirits – mainly rice wine - who are provincially-based. A total of 313 small local producers were interviewed in four provinces.
3. **Importers:** Enterprises that focus on the importation of alcoholic products into Cambodia. They include small and large-scale enterprises. Only one interview was conducted with an importer despite approaching more than 50 importers of various scales. Several informal discussions were held with importers but most were reluctant to formally participate due to the sensitive nature of the industry. A list of importers is provided in the Appendix 1.
4. **Wholesalers and Distributors:** Enterprises who stock locally produced and imported alcoholic products for re-sale. A total of 21 interviews were conducted with wholesalers and distributors.
5. **Retailers:** Enterprises who sell directly to consumers. They can be ‘on premise’ retailers - restaurants or beer gardens where purchased alcoholic products are consumed on-site or ‘off premise’ retailers where the consumer purchases alcoholic products that are consumed elsewhere. A final sample of 120 retailers were interviewed in Phnom Penh.

Selection of provincial field sites was based on the number of alcohol refineries in the province and determined in consultation with The Asia Foundation (TAF). The provinces where the DFAT-supported Prevention of Intimate Partner Violence (PIPV) program has been delivered (Svay Rieng and Kratie) were included.¹ The survey questionnaire and interview questions were finalised and approved in consultation with TAF. It is important to note that the study was not designed to be representative of the industry as a whole.

The research team attempted to interview TV stations on their advertising revenues as well as speak to advertising agencies, however neither wished to engage in a formal interview given the current sensitivity of the industry with the drafting of the alcohol law. A desk top literature review was used to understand the value of the advertising industry by sector. All government data have been verified to the greatest extent possible.

¹ The Program supported the establishment of Community Alcohol Notification Systems (CANS) in 30 communes in Kratie and Svay Rieng. The CANS is a commune level by-law, which sets limits on the sale, consumption, and advertising of alcohol at the community level. The CANS program follows a participatory approach to engage stakeholders in the community through workshops, ongoing dialogue, trainings, and public campaigns to raise awareness about the harmful effects of alcohol abuse, develop notification systems, and strengthen primary and secondary prevention interventions – including counselling to alcohol abusers.

Study challenges

The study initially employed a purposive sampling strategy which aimed to capture all players along the alcohol supply chain in Cambodia. Large producers and importers nominated not to participate in this research despite many attempts to gain their permission. These firms requested a formal letter from the Government about the study before they would agree to participate and is evidence of the sensitive political climate present among the large producers, importers and distributors. As the 2017 Cambodian election draws closer the political environment is increasingly tense and magnifies the general sensitivity that surrounds the alcohol industry. These sensitivities may have contributed to the reluctance of large producers to participate without a Government letter of approval.

Despite their non-participation, a variety of secondary Cambodian Government data was drawn upon and has provided insight into the volumes of alcohol produced and the amount of revenue raised through taxes and import duties in the country.

Table 2: Sampling of stakeholders in the supply and distribution of alcohol

Suppliers and distributors	Type of enterprise	Definition	Sample required and achieved
<i>Producers</i>	Formal Large Enterprises	Manufacturing facilities registered with the CDC ² and who supply domestic and international markets. The large producer market is dominated by beer manufacturing although there are some spirit and wine producers.	Sample Required: Up to 20 in Phnom Penh and Sihanoukville. Final sample: Despite numerous requests only one formal interview with a large producer was conducted.
	Small informal Producers	Mostly informal rice wine or herbal medication makers who are provincially based.	Sample Required: Up to 30 in three provinces Final sample: 313 across four provinces.
<i>Importers, wholesalers and distributors</i>	Generally large players who are importers only, or act as wholesalers as well. Wholesalers can also be distributors as well, and in turn distributors can also be retailers	Characterised by the volume of the majority of the business (ie imports, wholesale or distribution). Importers mostly import hard spirits and wines.	Sample Required: <i>Importers:</i> Up to 5 in Phnom Penh. <i>Wholesalers and distributors:</i> Up to 10 of each in Phnom Penh. Sample Achieved: <i>Importers:</i> Only one importer agreed to participate in an interview. <i>Wholesalers and distributors</i> – A sample of 21 was achieved in Phnom Penh.
<i>Retailers</i>	On premise	On-premise retailers sell alcohol direct to consumers who drink on premise at the retailers' location. They include KTV, restaurants,	Sample Required: Up to 10 in Phnom Penh only. Sample Achieved: 120 in Phnom Penh.

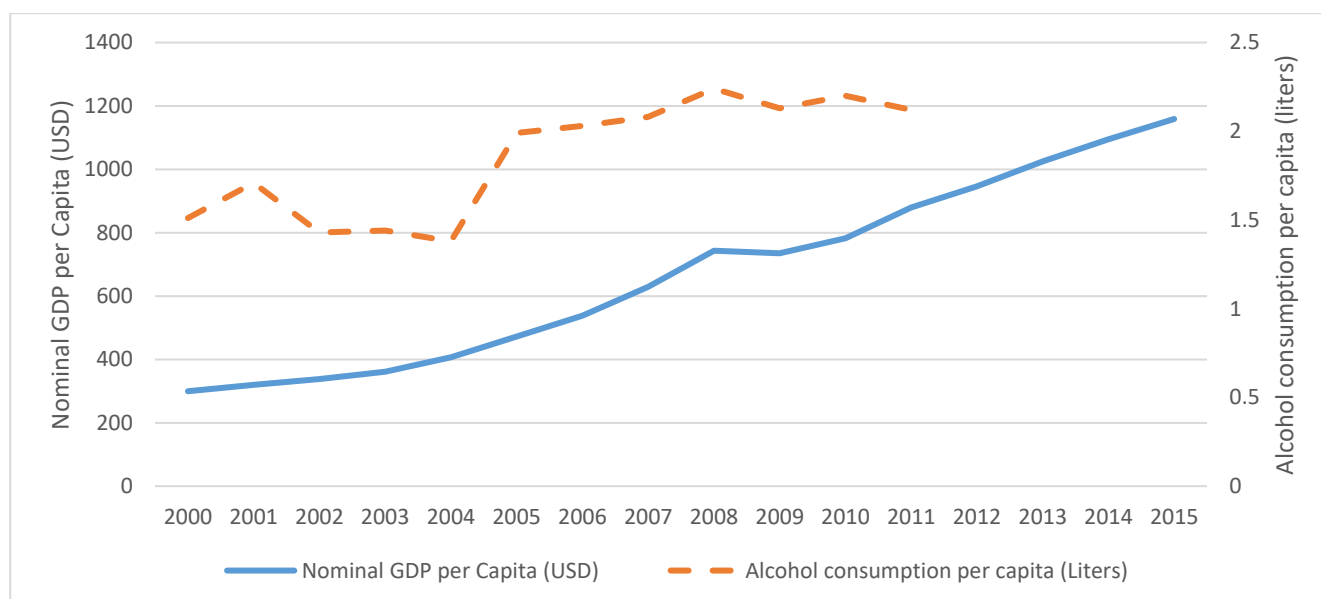
² Council for Development of Cambodia.

Suppliers and distributors	Type of enterprise	Definition	Sample required and achieved
		Mini marts, night clubs and bars.	
	Off Premise	Off-premise retailers who sell alcohol direct to consumer who take the product elsewhere for consumption. Includes small family shops that sell a variety of products and large supermarkets.	

2-The cultural and development context of alcohol consumption in Cambodian

According to the Global Status Report on Alcohol and Health (World Health Organization [WHO], 2014), alcohol consumption in Cambodia has increased in recent decades. The WHO (2011) state that as income increases so too does alcohol consumption (see Figure 2). In Cambodia, this has been the case: GDP per capita has increased from US \$300 in 2000 to US \$1159 in 2015 (ibid). Cambodia became a lower-middle income country in late 2015 and middle class patterns of consumption have emerged (World Bank, 2011, 2014).

Figure 1: Relationship between GDP per capita and alcohol consumption per capita in Cambodia



Source: Compiled based on GDP per capita: The World Bank. Alcohol Consumption data (WHO 2011, 2014).

Accurate data on the relationship between Cambodia's GDP per capita and alcohol consumption in litres per capita demonstrate an overall pattern of increased alcohol consumption. Between 2003 and 2005 Cambodians over 15 years of age drank an average of 4.6 litres of alcohol per person. This figure rose to 5.5 litres between 2008 and 2010, and has remained relatively flat since then (Barron, 2014). Even though levels of alcohol consumption in Cambodia are below the global average of 6.2 litres, Cambodian men consume an average of 9.7 litres per person (Barron, 2014). This is equivalent to almost six times the amount of alcohol consumed by their female counterparts (ibid). Men's alcohol consumption significantly exceeds global averages. Distinctive gendered patterns of alcohol consumption are thus evident in Cambodia.

In Cambodia, spirits have enjoyed the highest rates of consumption per capita since 2000 but since 2010 have declined. In contrast, the consumption of beer has increased since 2004, and since 2010 surpassed per capita levels of spirit consumption (see Figure 2). Wine makes up a small proportion of overall alcohol consumption per capita. These data show that patterns of alcohol consumption have occurred in conjunction with broader social and economic transformation and development.

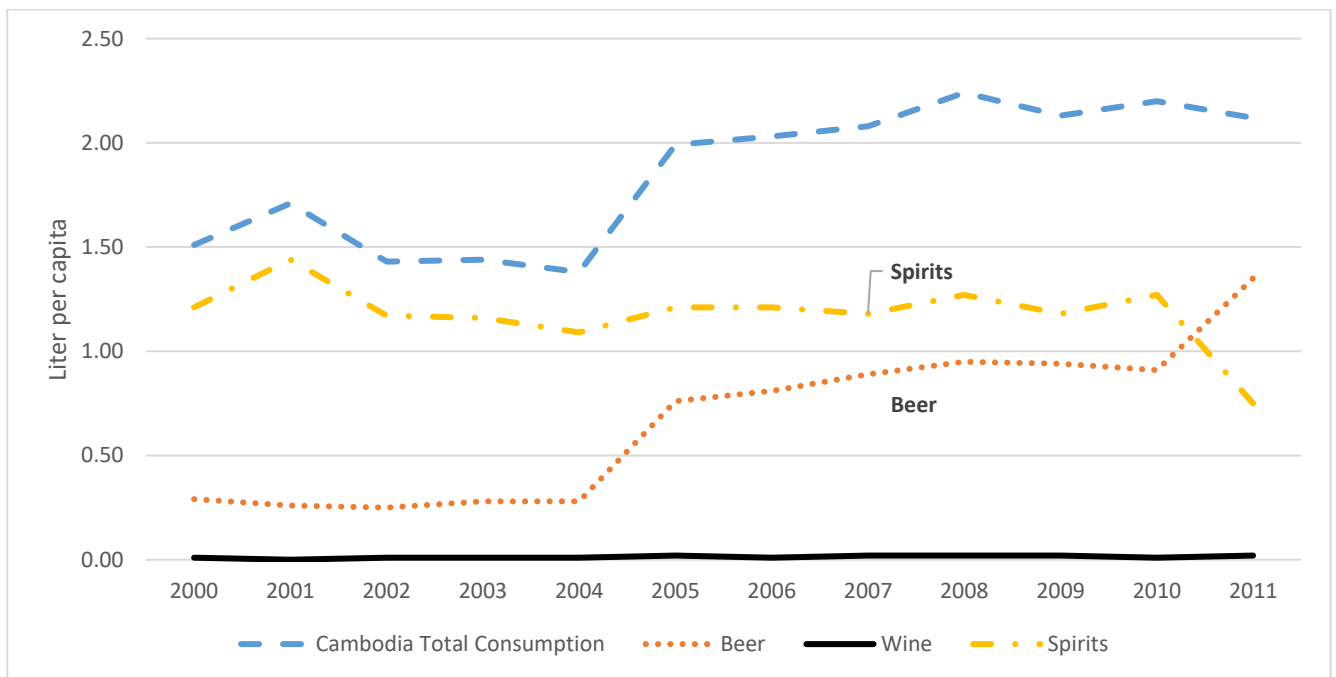
Peer pressure and family drinking patterns push young people – men in particular - to start drinking (Lee, 2012). Some common Khmer expressions demonstrate the social pressure on young persons to drink. For example:

“If you do not drink to get drunk, then why bother drinking?”

“If you are invited to a party and choose not to drink, then why bother coming?” (Jamieson, 2012).

Alcohol consumption is also an important component of an adults’ social and professional life, especially for men. Connections with friends and acquaintances old and new are built and enhanced through the consumption of alcohol (Lee, 2012). In addition, at formal events, government officials and other elites drink alcohol - especially red and white wine and champagne – to toast when agreements are signed (Pang, 2015).

Figure 2: Alcohol consumption by alcohol type



Source: Compiled from WHO Alcohol Consumption data

Alcohol consumption has many detrimental effects on Cambodian society, particularly for women. Alcohol abuse has resulted in more than 60 major types of disease including cardiovascular disease, cirrhosis of the liver, cancer and sexually transmitted diseases including HIV/AIDS (Jamieson, 2012). Alcohol is a factor in many unintentional deaths and injuries. In the first 6 months of 2015 for example, there were more than 2500 alcohol-related traffic accidents (Pang, 2015). Alcohol is also a risk factor for domestic violence as the work of several NGOs and research reports demonstrate (Brickell, 2008; Eng et al., 2010; Kishor & Johnson, 2004; Smith, 2014). The Cambodian Human Rights and Development Association (ADHOC) found 150 and 74 cases of domestic violence that included physical and emotional violence involved heavy alcohol consumption - in 2014 and in the first half of 2015 respectively (Adhoc, 2012). Data for 2015 and 2016 were not available at the time of writing this report. To a large extent women bear the negative health and social impacts of men’s consumption patterns as the carriers of the financial burden, carers when health issues arise, and particularly as victims of alcohol induced violence.

In Cambodia alcohol advertisements are prevalent and highly visible particularly in urban areas, but also along major roads, on restaurant walls and the roofs of private houses, on television, in newspapers, magazines and websites. Advertisements feature film and sport stars, and other celebrities alongside slogans that promote national pride, bravery, community, fashionable taste, and desire that is often highly gendered and sexualised. Advertisements entice Cambodians to consume alcohol and consumption marks the consumer as fashionable and as 'cool' as the public figures in advertisements while at the same time promotes nationalism (Tong, 2013).

Social, economic and cultural factors together with the influential role of advertising are the predominant drivers of increased alcohol consumption among the Cambodian population, particularly men (Lee 2012). There are many beer gardens, pubs, restaurants and street vendors who sell alcoholic products across Cambodia but particularly in Phnom Penh. These businesses have grown in number and include a noticeable increase in large boutique breweries and importation of a variety of alcoholic products (Lee, 2012). Traditionally, Cambodians consumed alcohol on specific occasions such as Khmer New Year, wedding parties, or other celebrations. However, as incomes have risen these habits have changed.

3-Alcohol regulatory framework in Cambodia

Regulatory frameworks for alcohol and advertising in Cambodia are limited and those that are in place are poorly implemented and enforced. Consequently, legal and policy frameworks and alcohol advertisements offer consumers little, if any protection and few if any health warnings. At the same time, consumer demand and markets have grown and government revenue from tax and other charges on alcohol producers and importers have significantly increased.

3.1-Overview of Cambodia alcohol regulations

Cambodia has limited policies and interventions in place to regulate alcohol consumption and advertisements. (see Table 3).

1. **Alcohol Law:** A draft Alcohol Law is currently sitting with the Ministry of Health. The Law consists of 10 chapters and 23 Articles.
2. **Taxes:** There are a variety of taxes on locally produced and imported alcohol products. Small producers – typically rural and informal - fall outside of the limited legal regulatory and taxation framework.
3. **Legal age limit:** Currently there are no on or off premise minimum age limit for the sale of alcohol. The new law attempts to regulate a minimum age of purchase and consumption and is currently set at 21 years.
4. **Hours of sale:** Currently there are no on or off premise time limit for the sale of alcohol although at specific times, like during elections or special events, for example the funeral of the King, alcohol sales are banned for several days.
5. **Drink driving:** There are legal limits for blood alcohol concentrations for vehicle drivers although enforcement of these is weak.
6. **Alcohol advertisements:** There are no laws on alcohol advertising. There is only one directive, that is not legally binding for TV broadcasters, which bans alcohol advertisements between 6 and 8 pm every evening. Broadcasters and other actors in the sector do not adhere to this directive. At present there is no enforcement or penalty for non-compliance.
7. **Sponsorship:** There are no laws on alcohol sponsorship or sales promotions.
8. **Consumer protection:** There are no requirements for health warnings on alcohol products or advertisements. Cambodia only introduced health warnings for cigarettes in 2016.

Table 3: Summary of existing policies and interventions in Cambodia

POLICIES AND INTEVENTIONS			
Written national policy (adopted/reviewed) / National Action plan	Yes (2011) / No	National maximum legal blood alcohol concentration (BAC) when driving a vehicle (general / young / professional), in per cent	0.05 / 0.05 / 0.05
Excise tax on beer / wine / spirits	Yes / Yes / Yes	Legally binding regulations on alcohol advertising / product placement	Yes ³ / No
National legal minimum age for off-premise sales of alcoholic beverages (beer / wine / spirits)	No / No / No	Legally binding regulations on alcohol sponsorship / sales promotion	No / No
National legal minimum age for on premise sales of alcoholic beverages (beer / Wine / Spirits)	No / No / No	Legally required health warning labels on alcohol advertisements / containers	No / No
Restrictions for on / off premise sales of alcoholic beverages <i>Hours, days / places, density</i> <i>Specific events / intoxicated persons / petrol stations</i>	No, No / No, No No / No / No	National government support for communication action	Yes
		National monitoring system (s)	No

Source: WHO 2014

³ It is unclear what WHO are referring to as “legally binding regulations on alcohol advertising/product placement” in Cambodia as there are no regulations on alcohol advertising and product placement. The directive banning alcohol advertising during prime time television was issued in October 2014, however it is not law or legally binding.

3.2-Cambodia's new alcohol law

Cambodia's new alcohol law focuses on alcohol product control. In its current draft state it has ten chapters and 23 articles. The objectives of the new Alcohol Product control law - the Alcohol Law - are to:

- take action on alcohol product management and control;
- raise awareness and improve public participation in addressing the dangers of using alcohol products, and
- promote collaboration with ministries, national and international institutions and NGO partners to enhance education and minimize the use of alcohol products.

Although the draft Alcohol Law was forwarded to the Council of Ministers for approval before going to the National Assembly (Pech, 2015), the law is currently being reviewed by the Ministry of Health. The current status of the law is unclear and the process for progressing and passing the law is not known.

3.2-Social regulation of alcohol consumption

Even though the alcohol law is not yet finalised, there are voluntary social and cultural practices that regulate alcohol consumption. Voluntary regulatory practices can be found in Cambodian schools, pagodas, workplaces, hospitals, and many other places where people are informed not to consume alcohol or consume it only if absolutely necessary. For example, in hospitals there are no drinking of alcohol signs. In religious places it is culturally unacceptable to drink and most people entering or visiting a pagoda will adhere to this cultural norm. In workplaces, alcohol consumption is viewed as a serious misconduct that may negatively impact upon the health and safety of others.⁴ In many private sector companies the consumption of alcohol is considered to be a serious misconduct that could result in immediate termination without compensation.⁵

In addition to these socio-cultural norms that regulate alcohol consumption, the alcohol industry itself has tried to regulate usage. An example includes the so-called "Safety Night" campaign endorsed by the alcohol industry as an indispensable part of their corporate social responsibility. In this campaign the alcohol industry promoted responsible drinking and driving practices: "Eat before drinking, drink responsibly, and if drunk don't drive (Kong, N.D.). The impact of this campaign on behaviour is unknown.

⁴ Article 83 of the Labour Law

⁵ HRINC Compliance interview with Mr. Tha Sokthearo on compliance implementation with employers

4-Regulatory approaches to control the consumption of alcohol: international experiences

International evidence suggests that legal and policy frameworks can mitigate the detrimental effects of excessive alcohol consumption. This study reviewed international and regional experiences with two approaches to the regulation of alcohol consumption: firstly, restrictions on advertising alcoholic products and secondly, price control approaches. The introduction of restrictions on alcohol product advertisements has had mixed results in ASEAN nations. In many countries the content, time, place, and messaging of alcohol advertising is restricted but the effectiveness of such regulations is debatable. Advertising restrictions needs to be one strategy amongst a broader sweep of initiatives to regulate the alcohol industry in Cambodia.

4.1 – Regulation of advertising alcoholic products

Alcohol marketing greatly impacts people’s alcohol consumption behaviour, particularly young people in lower and middle-income countries (WHO, 2014). When young people are exposed to attractive marketing materials they tend to start drinking if they do not already drink, or to drink more if they are already drinkers (Anderson et al, 2009).⁶ The effectiveness of marketing to increase alcohol consumption makes it a very attractive tool for alcohol producers to widen their potential target market and profitability (WHO, 2014).

The WHO defines restrictions on alcohol advertising as legally binding restrictions on alcohol advertising, that is the promotion of alcoholic beverages by alcohol producers through a variety of media including national and cable television, national and local radio, print media, advertisements in cinemas, on billboards, at the point-of-sale, on the internet and social media. In many countries alcohol advertising is restricted in terms of content, time, place and messaging. The effectiveness of such regulations is debatable however, because restrictions have not been applied across all forms of media simultaneously. As a result, the general population continue to be exposed to significant levels of alcohol advertising even when restrictions are applied to one or more forms of advertising.

In Thailand for example, there is widespread alcohol advertising regardless of regulations to reduce advertising. The so called ‘Partial Ban’ places restrictions on advertisements on TV broadcasts, billboards, cinema, and print media. Many other forms of advertising such as the internet, sponsorships, sites of consumption, broadcast exemptions and vehicles continue to be utilised by advertisers.

Alcohol suppliers have turned to alternative spaces to intensively advertise their products (Thamarangsi, n.d.). From 2003 to 2004, budgets for mobile advertisements, including ads-on-vehicles and on-drinking-sites grew by 583 per cent and 148 per cent respectively (Thamarangsi, 2008). Even though all types of media have to avoid some content such as that which undermines public order, and are required to carry health warning messages that describe the consequences of alcohol consumption, only broadcast media is restricted in the times that advertisements are allowed (between 22:00-05:00 every day, including on weekend days and during holidays). Only billboards are spatially regulated and must be at least 500 meters from an educational or religious venue. Additionally, several other acts that breach regulations are in place in Thailand (Thamarangsi, n.d.). The effectiveness of such bans is thus unclear.

4.1.1 - ASEAN regulations on alcohol advertising and consumption patterns

Examination of the relationship between advertising and alcohol consumption in ASEAN nations shows that restrictions on alcohol product advertising has had mixed results. This study has examined the latest available data from 2012 for all ASEAN nations (WHO, 2014). Data has been compiled from the WHO Global Status Report on Alcohol and Health (2014) and the WHO’s Global Health Observatory Data Repository (accessed in June, 2016).⁷ The compiled data examines the impact of restrictions on alcohol advertising on national television on the consumption of beer,

⁶ See Anderson, et al (2009) Impact of Alcohol Advertising and Media Exposure on Adolescent Alcohol Use: A Systematic Review of Longitudinal Studies, *Alcohol and Alcoholism*, Vol 44(3):229-243.

⁷ Source: Compiled from World Health Organization Report (2014) and Global Health Observatory Data Repository. Available at http://www.who.int/substance_abuse/publications/global_alcohol_report/profiles/en/ and <http://apps.who.int/gho/data/node.main.A1131?lang=en>. Accessed on 28 June 2016.

wine and spirits within the ASEAN region. Table 4 provides an overview of advertising bans by alcohol product in ASEAN nations.

In Cambodia there are no legally binding restrictions on the advertising of alcohol products. Although a circular that restricts advertisements in peak viewing time came into force in January 2015, it is not legally binding. This suggests that the WHO data for Cambodia which state that there is a legally binding ban on advertising is inaccurate. For this reason, a second data point called Cambodia 2 has been included and is a realistic representation of the lack of enforced restrictions on alcohol advertising in Cambodia.

Figures 3, 4 and 5 present the amalgamated WHO (2014) data on the relationship between regulations on alcohol advertising and the consumption of beer, wine and spirits. In each of these graphs the Y axis refers to the rate of consumption per capita by the type of alcohol being examined, that is beer, wine or spirits. Although more recent data is available on consumption patterns for most countries, data for 2012 has been used as it can be matched with the latest available data on advertising restrictions in ASEAN nations from 2012. The X axis refers to the extent of legislative restrictions on the advertising of alcohol on national television.

Beer consumption and advertising restrictions

Amongst ASEAN nations Indonesia, Myanmar and Brunei have bans on beer advertising on national television. Although Cambodia has restrictions on advertising beer during prime viewing times, the ban is not enforced. The data shows that countries with total bans on beer advertisements on national TV have lower rates of beer consumption per capita – Brunei, Malaysia, Myanmar and Indonesia. Countries with no restrictions, voluntary or partial restrictions have higher rates of beer consumption – Lao, Vietnam, Philippines and Cambodia (see Figure 3).

Table 4: National television advertising restrictions in ASEAN nations

	<i>Beer Ads</i>	<i>Spirits Ads</i>	<i>Wine Ads</i>
<i>Brunei Darussalam</i>	ban	ban	ban
<i>Cambodia</i>	Partial restriction	Partial restrictions	ban
<i>Cambodia 2</i>	No restrictions in 2012 – partial restriction today	No restrictions	No restrictions in 2012 – partial restriction today
<i>Indonesia</i>	ban	ban	ban
<i>Lao People's Democratic Republic</i>	no restrictions	no restrictions	no restrictions
<i>Malaysia</i>	ban	ban	ban
<i>Myanmar</i>	ban	ban	ban
<i>Philippines</i>	no restrictions	no restrictions	no restrictions
<i>Singapore</i>	voluntary/self-restricted	voluntary/self-restricted	voluntary/self-restricted
<i>Thailand</i>	partial restriction time/place	partial restriction time/place	partial restriction time/place
<i>Viet Nam</i>	no restrictions	ban	partial restriction content

Source: WHO (2014).

Wine consumption and advertising restrictions.

Amongst ASEAN nations there is no direct relationship between alcohol advertising and wine consumption. Total advertising bans, no restrictions and even partial restrictions on advertising have had no impact on wine consumption per capita (see Figure 4). In most ASEAN nations wine is an expensive commodity to purchase as it is not produced locally. Wine is imported from France, Australia, the South America's and South Africa, which influences the cost and thus the decision to purchase wine. Singapore has the highest GDP per capita amongst ASEAN countries, are the biggest consumers of wine and have only voluntary advertising restrictions. Countries with a total ban on advertising like Brunei, have the second highest consumption of wine per capita. These data suggest that there is a stronger relationship between per capita income and wine consumption than advertising restrictions. These data suggest that

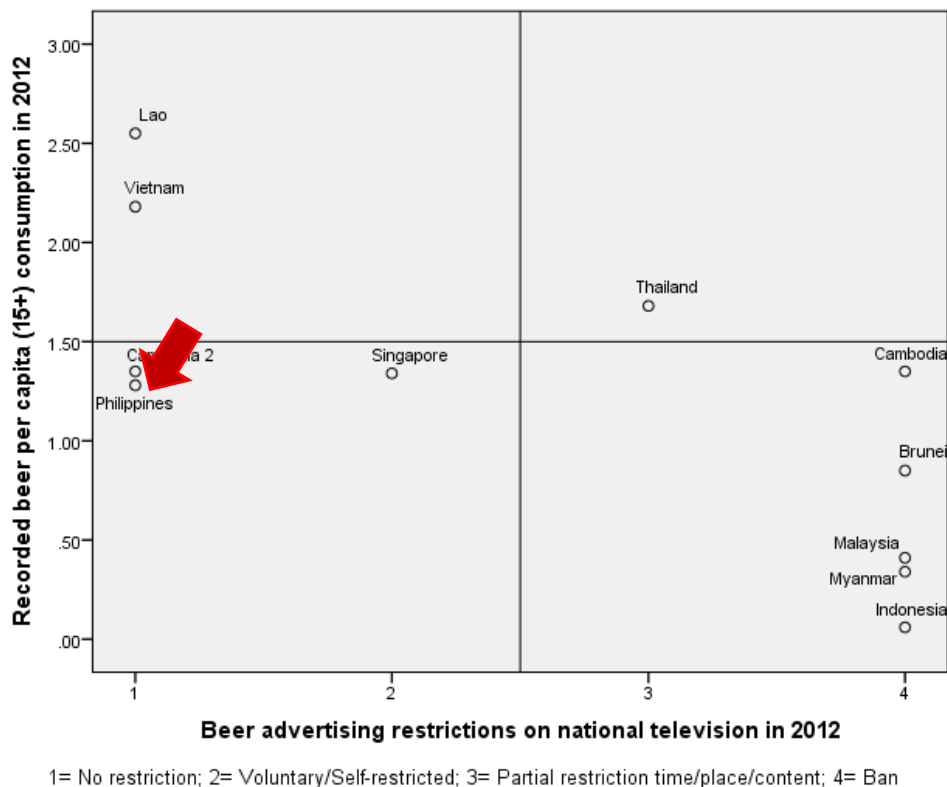
in lesser developed ASEAN nations there is not a culture of wine consumption. However, with increasing GDP per capita income and globalisation wine consumption has increased.

Spirit consumption and advertising restrictions.

Amongst ASEAN nations the consumption of spirits varies greatly. Thailand has the highest consumption of spirits per capita and partial restrictions on advertising. The Philippines and Laos have the second and third highest consumption rates and do not restrict advertising. Most countries with bans on spirit advertising – with the exception of Vietnam – record low rates of spirit consumption. There is no clear correlation between bans on spirit advertising and lower consumption levels (see Figure 4).

The data shown in Figures 3, 4 and 5 demonstrates that the introduction of restrictions on alcohol product advertisements has had mixed results in ASEAN nations and suggests that other cultural and price-related factors are at play. Cultural, social and societal characteristics as well as income and education levels of a nation also shape how advertising restrictions influence alcohol consumption levels. Strategies to reduce the multiple negative health and social impacts of alcohol consumption need to be tailored to the specific context and development characteristics of the nation concerned. Restrictions on alcohol advertising must be accompanied by additional strategies that target the alcohol industry, economic and socio-cultural factors.

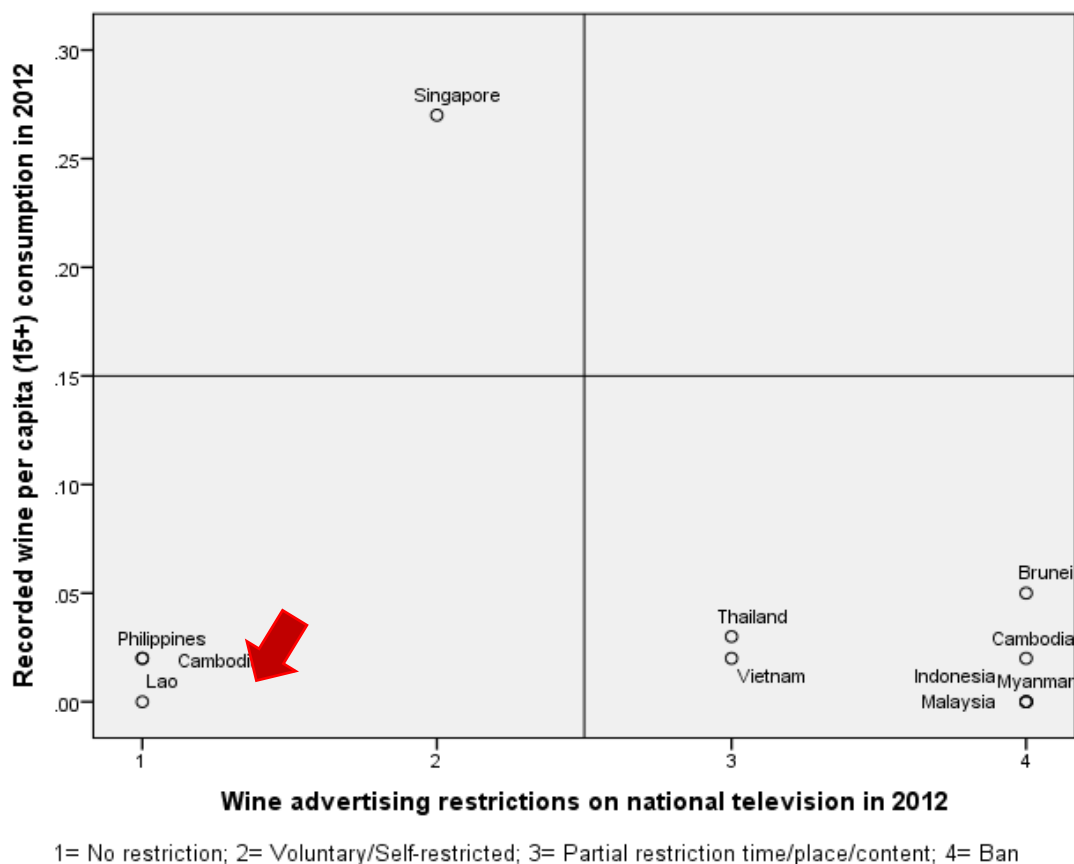
Figure 3: Advertising restrictions and beer consumption per capita in ASEAN nations (2012)



Source: Compiled from WHO (2014) and Global Health Observatory Data Repository.⁸

⁸ <http://apps.who.int/gho/data/node.main.A1026?lang=en> and <http://apps.who.int/gho/data/node.main.A1132?lang=en>. Accessed on 28 June 2016.

Figure 4: Advertising restrictions and wine consumption per capita in ASEAN nations (2012)



Source: Compiled from World Health Organization report 2014 and Global Health Observatory Data Repository.⁹

4.1.2 -Cambodian regulatory framework for alcohol product advertising

TV advertising is the most dominant type of advertising in Cambodia. TV reaches a wider population than other forms of media and is relatively cheap. National television is the biggest source of advertising income in Cambodia. It is estimated that the total advertising revenue generated from the top ten TV channels in Cambodia reached around US \$100 million per year in 2015. Beverages, including alcohol, accounted for 50 per cent of the total (Kunmakara, 2016). It is estimated that advertising revenues will exceed US \$100 million per year in the coming years.

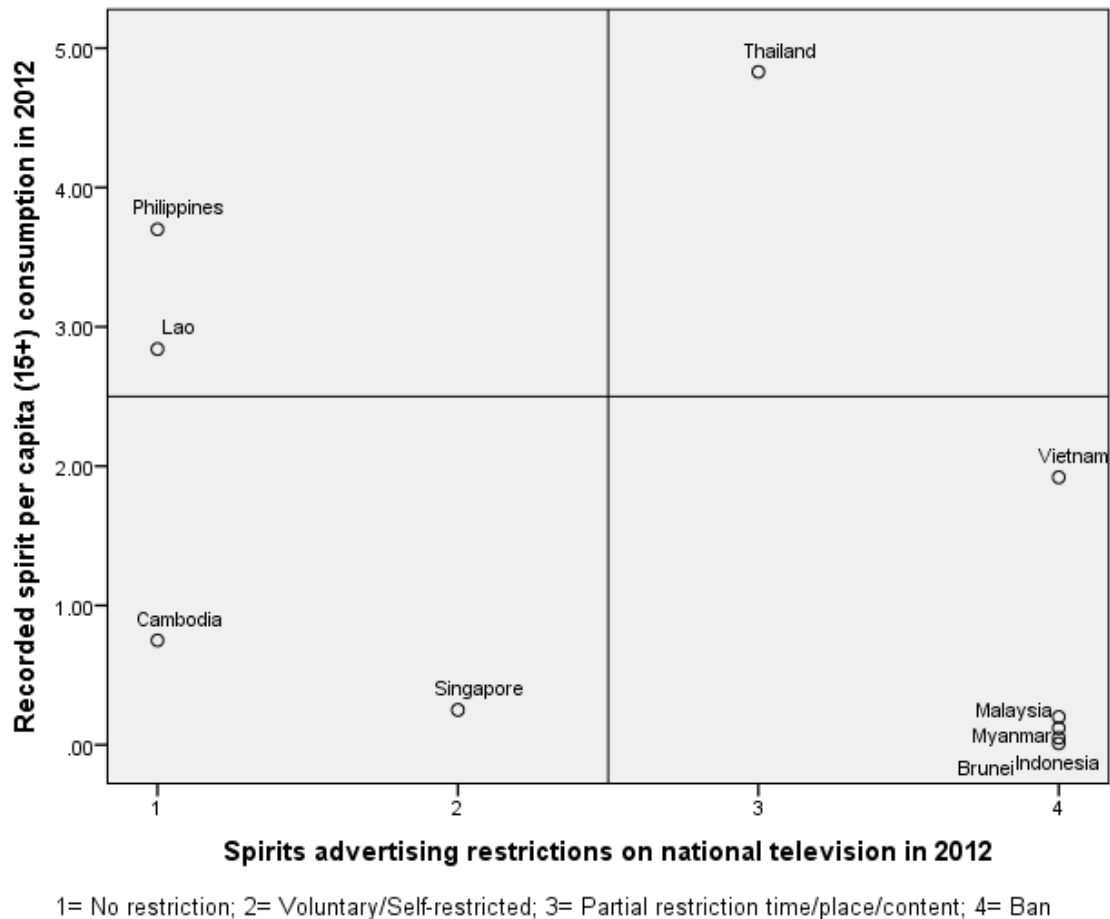
Companies use various marketing methods from electronic to print media to boost their sales, increase market share and strengthen their long-term profitability. However, the majority of advertising (60 per cent) is on national TV. An additional 15 per cent of advertisements are on outdoor billboards, while print media, radio and others types of media account for 15 and 10 per cent respectively (Kunmakara, 2016) (see Figure 6). TV is clearly the dominant media type, which according to the General Manager of CNC, one of the top 10 TV stations in Cambodia, is due to the relatively cheap advertising rates in Cambodia. In addition, the General Manager notes that companies use TV to push sales, increase brand and market awareness as the economic environment becomes more and more competitive.

The beverages sector is the dominant advertising sector and accounts for 50 per cent of total advertising (see Figure 6). Far behind beverage advertisements are cosmetics targeted at women (16 per cent) of advertisements followed

⁹ <http://apps.who.int/gho/data/node.main.A1026?lang=en> and <http://apps.who.int/gho/data/node.main.A1132?lang=en>, Accessed on 28 June 2016.

by the food industry (10 per cent of advertisements). All other sectors such as pharmaceuticals, construction, telecommunications and financial services account for less than 10 per cent of the total sector (Kunmakara, 2016) (see Figure 6). Beer advertising increased by 164 per cent in 2011 making it one of the fastest growing areas in the Cambodian advertising industry. There is no doubt that alcohol advertising is a major source of revenue particularly for TV stations. For the Cambodia News Channel (CNC) alcohol advertising alone accounted for about 20 per cent of the company's total advertising income.

Figure 5: Advertising restrictions and spirits consumption per capita in ASEAN nations (2012)



Source: Author compiled from World Health Organization report 2014 and Global Health Observatory Data Repository.¹⁰

¹⁰ <http://apps.who.int/gho/data/node.main.A1026?lang=en> and <http://apps.who.int/gho/data/node.main.A1132?lang=en>. Accessed on 28 June 2016.

Figure 6: Advertising by media type and sector



Source: Kunmakara (2016).

Replacement of alcohol advertising

The Ministry of Information issued a circular on 1 October 2014 which bans alcohol advertisements from 6-8 pm from January 1st, 2015. However, it has had no significant impact on the advertising industry. Industry representatives note that other sectors are taking up prime time slots on TV whilst the alcohol sector has shifted their time slot. Alcohol revenues have not decreased as expected and may have even increased (Kunmakara, 2016). The Under-Secretary of State at the Ministry of Information signed an announcement on January 11th, 2015 that if any TV channel violates the Ministry's circular of October 1st, 2014, they may face broadcasting postponement from two weeks to one month and license revocation (Neou, 2015). Consistent enforcement of these circulars and announcements is required.

Replacement opportunities for alcohol advertising are limited unless more popular and more diversified programs becomes attractive to Cambodian audiences. TV advertising and sponsorship is primarily driven by the popularity of the programs screened – the more popular a program, the more ability there is to attract sponsorship. The most popular programs in Cambodia are entertainment programs followed by news (Kunmakara, 2016).

4.2- Price control regulations: international experiences

Governments around the world have been exploring feasible, effective and efficient ways to reduce alcohol related deaths. One strategy is the implementation of price controls on alcohol. Price control refers to regulation of the price that alcoholic beverages are sold for. There are many instruments that governments utilize in regard to price control. Most common are bans on minimum pricing, on below cost sales and multi-buy promotions. Such strategies aim to reduce alcohol consumption by introducing financial measures to deter consumers from purchasing and consuming alcohol. A variety of price control measures including minimum pricing, ban on below cost sales, and multi-buy promotions were reviewed as part of this study. There is little solid evidence that demonstrates the impact of price control strategies on existing patterns of alcohol consumption.

4.2.1 – Minimum pricing

Minimum pricing for alcoholic beverages refers to a policy where a minimum price is set for the sale of alcoholic products. Sales below the set price are not allowed. This pricing strategy takes alcohol concentration into account and more alcoholic drinks are more expensive (Government, n.d.). Minimum pricing for alcohol products uses price signals to reduce the consumption of very cheap alcohol by raising the price. This policy has been implemented in a number of countries including Canada and Scotland.

Minimum pricing like the ban on below cost sales of alcohol products is controversial (IAS, 2014). On the one hand it is believed to be an effective way to reduce alcohol consumption, on the other it has been shown to encourage certain groups to drink, such as under age men and women. According to a study conducted by Lonsdale et al (2012), the impact of minimum pricing per alcohol unit is minimal. Slight changes in people's drinking patterns including drink choice and binge drinking were recorded in response to minimum pricing policies. Lonsdale et al (ibid) notes that minimum pricing is expected to affect future generations through higher cost alcohol leading to lower levels of consumption. Furthermore, participants believe that a minimum pricing strategy is a restriction of personal freedom

and on this ground they were opposed to the use of government regulations to restrict alcohol consumption (Lonsdale et al 2012). Respondents also believed that minimum pricing discriminates against the poor and is assumed to positively change alcohol consumption of the poorest whilst having little or no effect on the wealthy.

4.2.2 – Below cost sale of alcohol

A ban on below cost sales of alcohol products means that the sale of any type of alcoholic beverage at a price below the combined cost of government-imposed duties and value-added tax is forbidden (IAS, 2013). This type of ban is in place in a few member states of the European Union (EU), namely Poland, France, Italy, and Belgium (IAS, 2014). In England and Wales, a ban on below cost sales was implemented and set as a supplement to the binding code on alcohol retailing. Generally, a ban on below cost sales of alcohol products is perceived to be able to prevent the sale of alcoholic products at heavily discounted prices and lower excessive alcohol consumption though this is debatable (IAS, 2013). A 2014 study in England showed that a ban on below cost selling only affected 0.3 per cent, 0.5 per cent, and 1 per cent of the alcohol units consumed by the moderate, hazardous, and harmful drinkers aged 16 and above respectively. The reduction in mean consumption of alcohol stands at only 0.04 per cent compared to 1.6 per cent for minimum unit pricing interventions (Brennan et al., 2014). These studies shows that minimum pricing and bans on below cost sales has little impact on existing patterns of alcohol consumption.

According to Leicester (2011) a ban on below cost of alcohol products will dissuade alcohol companies from overproducing alcohol and prevent anti-competitive behaviour by large retailers. However, some large retailers continue to sell alcohol below cost to prevent competition by small retailers which has provoked government intervention (ibid).

4.2.3 – Multi buy promotions

Multi-buy promotions are another alcohol pricing strategy to prevent retailers from temporarily dropping prices to below minimum baseline prices. For example, in Scotland, buy-one-get-one-free, buy-two-for-the-price-of-one, buy-six-get-20-per cent-off, and other similar types of promotions would be legally banned under this pricing policy. Like the above two pricing policies, multi-buy promotion are believed to be a strong deterrent to alcohol-consumption but this continues to be debated (IAS, 2014).

Preliminary evidence of bans on multi-buy promotions in impact in Scotland where a multi-buy ban came into force in October 2011, demonstrate a significant decrease in sales of alcoholic beverages three months after implementation of the ban. However, the Government decided not to outlaw the multi-buys claiming that evidence that it would significantly reduce alcohol consumption was inconclusive (IAS, 2014). There is a clear need to understand the structure of the alcohol market and to think carefully about impact of price controls on business as well as on consumption patterns.

Price controls in the Cambodian context

To date the Cambodian government has had little control or influence over local product pricing and to introduce such measures could be received badly by large producers in the alcohol industry. Price control strategies need to be considered in the broader context of the structure of product manufacturers as well as the enforceability of such a regulation in Cambodia. Many households produce rice wine and home-made alcohol products and there are significantly more small producers than large. The alcoholic products of small household enterprises are generally consumed by rural residents who tend to be poor; product prices are generally quite low. Price control strategies particularly for the products of larger producers warrants a larger and more in-depth study.

5 -The Supply and Distribution of Alcohol in Cambodia

In the last two decades the Cambodian economy has transformed from a centrally planned to a market economy integrated into regional and global trade regimes. Cambodia became a member of the Association of Southeast Asian Nations (ASEAN) in 1999 and the World Trade Organization (WTO) in 2004 (Chap, 2008). In relation to alcoholic products the introduction of a market economy has resulted in the Royal Government of Cambodia's privatization of many state-owned small and medium enterprises (SMEs). Unprofitable enterprises including breweries were targeted as a strategy to enhance their effectiveness and efficiency (Chap, 2011). Many local residents and foreigners were attracted to invest in alcohol product manufacturing and as a consequence the scale and volume of alcohol production in Cambodia has increased alongside an advertising industry to create market demand.

Company registration for alcohol manufacturing plants in Cambodia.

Multiple Ministries are involved in the registration of businesses. Business size and type of investment determine which ministries and how many are involved in the registration process. Foreign direct investment and large local investors of over 1 million US dollars must register with the Council for Development of Cambodia (CDC). This Council is a one stop shop responsible for the co-ordination of, and the provision of information on relevant business and taxation incentives for large investors. In addition to registration with the CDC, businesses must register with the relevant line ministries – whether the Ministry of Commerce, the Ministry of Industry or related ministry as well as with the Tax Department to obtain tax numbers. All companies with over eight employees must also register with the Ministry of Labour and the National Social Security Fund (NSSF).

Local and foreign investors with smaller manufacturing facilities and investments in alcohol production and processing must receive permits from the Ministry of Industry and Handicraft before they can legally establish and begin their operations. To obtain a permit to operate registered facilities must submit a permit application to the Ministry of Industry. The application is reviewed in accordance with the General Department of Industry of the Ministry of Industry's minimum permit requirements. A letter of recommendation is then submitted to the Minister who grants a permit – or not - to the manufacturer submitting the application.¹¹ Typically, businesses that are registered with the Ministry are considered to be 'real regime' enterprises.

Small scale informal enterprises have traditionally fallen outside of the official parameters of 'real regime' enterprises and into 'estimated tax regime' enterprises. They may have simply registered with the municipality and pay estimated taxes each year. Since 2016, the estimated tax regime has been abolished and all enterprises are now required to become formal. It is hoped that formalisation will provide a more business-like environment where businesses and the workforce have full legal protections and access to relevant social security and services.

5.1-Alcohol Producers in Cambodia

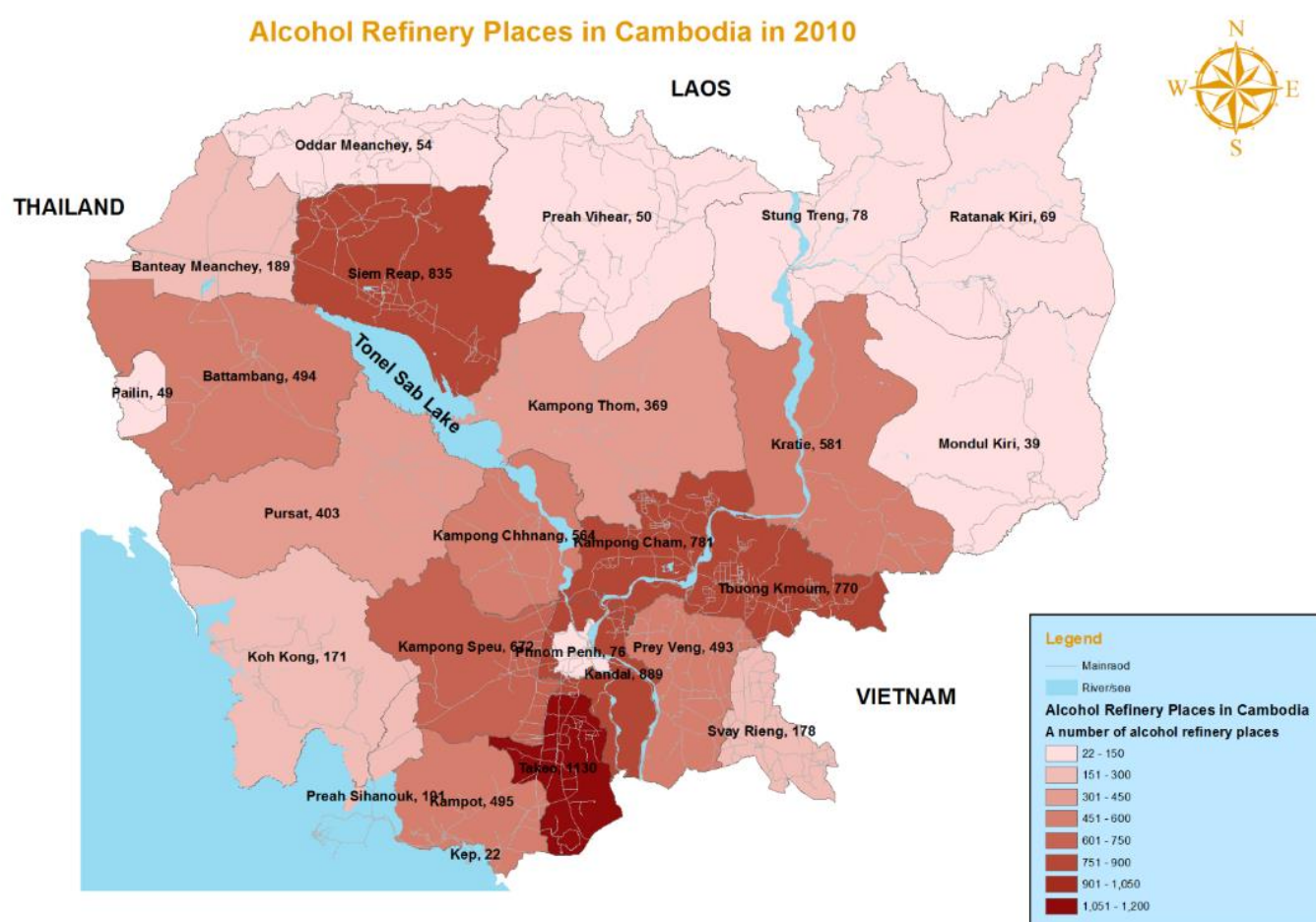
According to the latest Cambodian Commune database, in 2010 Cambodia had just over 9,600 alcohol refinery operations in the country. Figure 7 shows the density of alcohol refineries per province. Provinces that are dark red have a high density of producers whereas provinces that are light red colour have a low density.

Large Producers

In this study large producers were defined as having made large investments of typically more than 1 million US dollars into alcohol production plants. They have significant capital investment in facilities as well as provide employment opportunities. In addition to production facilities, they have developed national distribution channels including marketing and support. To understand the annual production capacity of these large producers' secondary data has been analysed. Table 5 presents data on the scale of beer production in litres produced per year for four largest producers in the country.

¹¹ More details about the related procedures and formalities can be found on the website of the Ministry at <http://www.mih.gov.kh/>.

Figure 7: Alcohol Refineries in Cambodia (2010)



Source: Generated using data from the Commune Database 2010.

Table 5: Annual production rate of the four largest beer producers in Cambodia

Brewery name \ Year	2010	2011	2012	Unit
Cambrew Brewery	100,000,000	85,000,000	No data	Litres
Cambodia Brewery	71,280,000	No data	No data	Litres
Khmer Brewery	NA	50,000,000	150,000,000 ¹²	Litres
Kingdom Brewery	4,000,000	No data	No data	Litres

Source: Different sources¹³

In addition to large producers, Cambodia has seen an increase in micro-breweries particularly in Phnom Penh where many speciality beers are produced and sold direct to the public. Kingdom Brewery - listed above for example, is considered a speciality brewery and is significantly smaller than its larger counterparts. New micro-breweries even smaller than Kingdom Brewery are also increasing in number. These typically brew beer for consumption and unlike Kingdom Brewery are not bottling beer. The diversity of beer-brewing enterprises in Cambodia is quite a unique and dynamic industry that caters to consumers with more and more sophisticated and diverse pallets.

Small local producers

¹² It was just a planning (1-2 million hectoliter) if Cambodian beer market grew

¹³ <http://sea-globe.com/beer-wars/> ; <http://www.phnompenhpost.com/business/competition-bubbles-breweries> ; <http://www.phnompenhpost.com/business/cambodia-brewery-ltd-sales-down-10pc-09>

Table 6 is a summary of small rice wine producers interviewed in this study. Small producers were targeted across four provinces - Kandal, Kratie, Siem Reap and Takeo.

Table 6: Characteristics of small alcohol producers

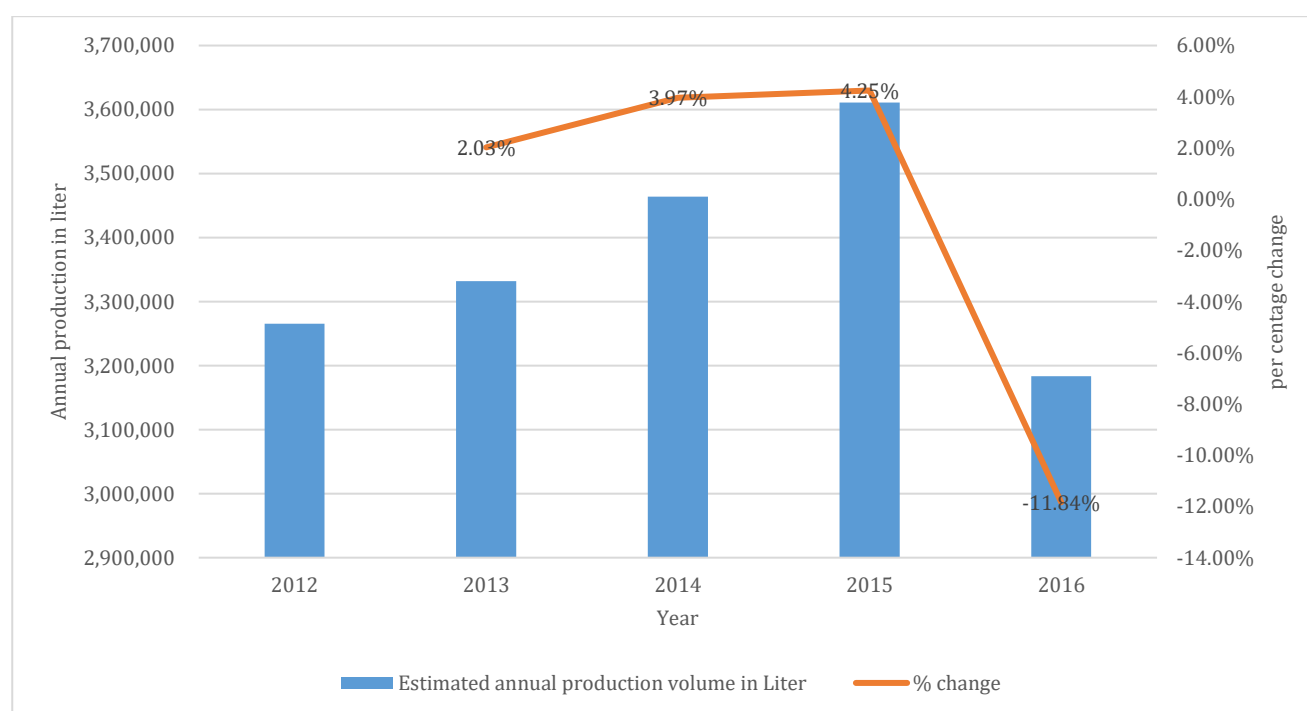
Small local producers
<ul style="list-style-type: none"> • 43 per cent of small producers were female owned and managed. • 86 per cent did not pay tax. • Most producers (84 per cent) are not aware of the alcohol law. • Only 1.6 per cent knew that government issued a directive to increase taxes. Most did not know how such taxes would impact them. • 96 per cent did not have any challenges with corruption or informal payments. • 70 per cent did not expect their business to grow in the coming three years.
<p>Enterprise characteristics</p> <ul style="list-style-type: none"> • Start-up capital ranged from US \$25 to 3000 with an average US \$470. Most were within the US \$100 –US \$600 range. • Assets held were small on average around US \$400.
<p>Income from alcohol production as a percentage of total income</p> <ul style="list-style-type: none"> • 60 per cent of reported that alcohol production makes up to 40 per cent of their total income. • 23 per cent reported that alcohol production is 40 – 60 per cent of their total income. • 12 per cent reported that alcohol production is 60 – 80 per cent of their total income.
<p>Supply chain and financing</p> <ul style="list-style-type: none"> • 53 per cent developed their own distribution channels and sell to local stores for resale. Of these 40 per cent sell their product in a family shop. • 49 per cent sell to shops on credit and are paid when products are sold. A deposit for the product delivered was required by 12 per cent) but it was more common for producers to be paid on delivery (39 per cent).
<p>Marketing and promotion</p> <ul style="list-style-type: none"> • 74 per cent reported that word of mouth was most important form of marketing and promotion used. • Social media and websites were reported as not important to promote products. • The majority producers did not intend to use social media for marketing and promotion
<p>Customer base</p> <ul style="list-style-type: none"> • 80 per cent of customers were men with an even distribution between the following age groups: 25 – 30, 30 – 40 and 40 – 50 years old. Less than 1 per cent were between 15 and 18 years old and even fewer were less than 15 years old (0.2 per cent). • 20 per cent of customers were women with an even distribution between the following age groups 30 – 40 and 40 – 50 years old. Less than 1 per cent were between 15 – 18 years old and less than 15 years old 0.2 per cent each. • Men reported that they mostly drink for social purposes (43 per cent), for medicinal reasons (20 per cent) and for energy (18 per cent).

Small local producers

- Women reported that they drink mostly for medicinal purposes (52 per cent), for energy (22 per cent) and for socializing (20 per cent).
- Consumers were generally low to middle income clientele.

There was an increase in spirit production by small local producer from 3.27 million litres in 2012 to 3.61 million litre in 2015 (see Figure 8). Small producers related this increase to several factors: the costs of raw ingredients, the availability of capital, favourable weather, labour, time and increased demand. Rice wine production increased for the same reasons. However, in 2016 rice wine production dropped to around 3.18 million litres. Most producers claimed that as the prices of the raw ingredients soared they had to decrease production. Additionally, the weather was extremely hot and hindered production. Some producers shifted their income generation strategy to farming, livestock, and other small family-owned business. Competition is also increasing with a number of new producers entering the market. Producers also reported that the demand for rice wine is decreasing in favour of commercial products.

Figure 8: Estimated annual rice wine production in litres



5.2-Wholesalers and Distributors

Wholesalers and distributors are enterprises with warehousing facilities in which they store a variety of alcoholic products. Wholesalers may also be distributors and some are also retailers who sell directly to consumers. In this study, they are grouped together as wholesalers and distributors. Only one respondents was a distributor. Table 7 below provides a summary of the wholesalers and distributors interviewed in this study. All wholesalers and distributors interviewed were based in Phnom Penh. Just over half (57 per cent) of informants were men and 43 per cent were women.

Table 7: Characteristics of wholesalers and distributors

Wholesalers and Distributors
<p>Enterprise characteristics</p> <ul style="list-style-type: none"> - Company asset size varied from smaller enterprises with US \$15,000 to those with more than US \$250,000. - Annual turnover ranged from below US \$15,000 to more than US \$1 million. Not all respondents answered this question. - Six invested less than US \$5,000 in startup capital. A further five invested US \$25 – 35,000 to establish their businesses. Ten respondents did not answer this question. - Corruption and informal payments were not a serious concern for just under half of respondents (43 per cent). - Nearly 50 per cent expected their business to grow in the next three years. - Most beers, with some also selling spirits and wine. <p>Customers</p> <ul style="list-style-type: none"> • 35 per cent sold to retailers, 23 per cent sold to other distributors and wholesalers. • 27 per cent also sold directly to consumers. • 24 per cent sold products to the provinces and of these, 50 per cent sold onto to distributors and retailers who sell direct to the consumer. 37 per cent sold products to wholesalers who did not sell to the consumer. <p>Finance and marketing</p> <ul style="list-style-type: none"> • The most common types of financial incentives provided by producers to wholesalers and distributors were discounts for bulk purchases (33 per cent) and favourable payment terms (33 per cent). • The most common types of finance provided to customers were favourable payment terms (43 per cent) and discounts for bulk purchases (36 per cent). • Corruption and informal payments in the distribution system were rated by 28 per cent of respondents as moderate to very serious. 24 per cent said these payments were not at all serious and 48 per cent did not know. • None of the companies reported the use of beer promotion ladies. • The most important marketing and the pricing tactic 'buy 2 get 1 free'. • Most respondents did not know about social media and online marketing. <p>Most (76 per cent) were not aware of the new alcohol law</p> <ul style="list-style-type: none"> • The development and implementation of laws and regulations relating to alcohol production was considered to be essential and a high priority by 38 and 19 per cent of respondents respectively. • 34 per cent believe there is insufficient consumer protection. 14 per cent had no idea. • The majority of informants (71 per cent) agree that there needs to be health warning signs on the dangers of drinking.

5.3-Retailers

Retailers are those enterprises who sell directly to consumers and can be on or off premise retailers. On premise retailers allow the consumer to drink on the premises, while off premise retailers sell alcohol and the consumer drinks it elsewhere. Table 8 provides a summary of retailers interviewed in this study.

Table 8: Characteristics of retailers

Retailers
<p>Business profile</p> <ul style="list-style-type: none"> • <i>Just over a third (38 per cent) of respondents considered themselves to be well established. However, 30 per cent were established in the last one to two years (2014-15).</i> • <i>Most have one shareholder only.</i> • <i>Asset sizes varied significantly however, the majority held between US \$10-20,000.</i> • <i>Most off premise retailers have a relatively small turnover of less than US \$55,000 while the turnover of on premise outlets varied greatly.</i> • <i>Half of both on and off premise outlets are positive about potential for future growth.</i> <p>Finance and marketing strategies</p> <ul style="list-style-type: none"> • <i>Finance and marketing strategies are relatively simple and include refunds, discounts, credit and favourable payment terms.</i> • <i>Most on or off premise retailers do not provide credit to customers (more elaboration on comments needs to be provided in the final report)</i> • <i>Less than 10 per cent (n=7) use promotion ladies.</i> • <i>Direct promotions to consumers are the most important marketing approach for on premise outlets. Promotions for retail is most important for off premise outlets.</i> • <i>'Buy 2 and get 1 free' is the most population way to promote products and drive sales.</i> • <i>TV is the most important advertising channel (50 per cent) followed by radio (14 per cent).</i> <p>Customer profile</p> <ul style="list-style-type: none"> • <i>Mostly men for both on and off premise retailers.</i> • <i>On premise retail customers were 21 – 40 year olds whereas off premise customers were slightly older 25 – 50 year olds.</i> • <i>Most customers (45 per cent) were considered to be middle income.</i> • <i>Most (over 80 per cent) were not aware of the new alcohol law.</i> • <i>Tax affects both on and off premise businesses. 37 per cent of on premise and 73 per cent of off premise noted that taxes affect them.</i> • <i>According to the retailers an increase in tax will have an impact on consumer drinking</i>

5.4-Distribution channels of alcohol

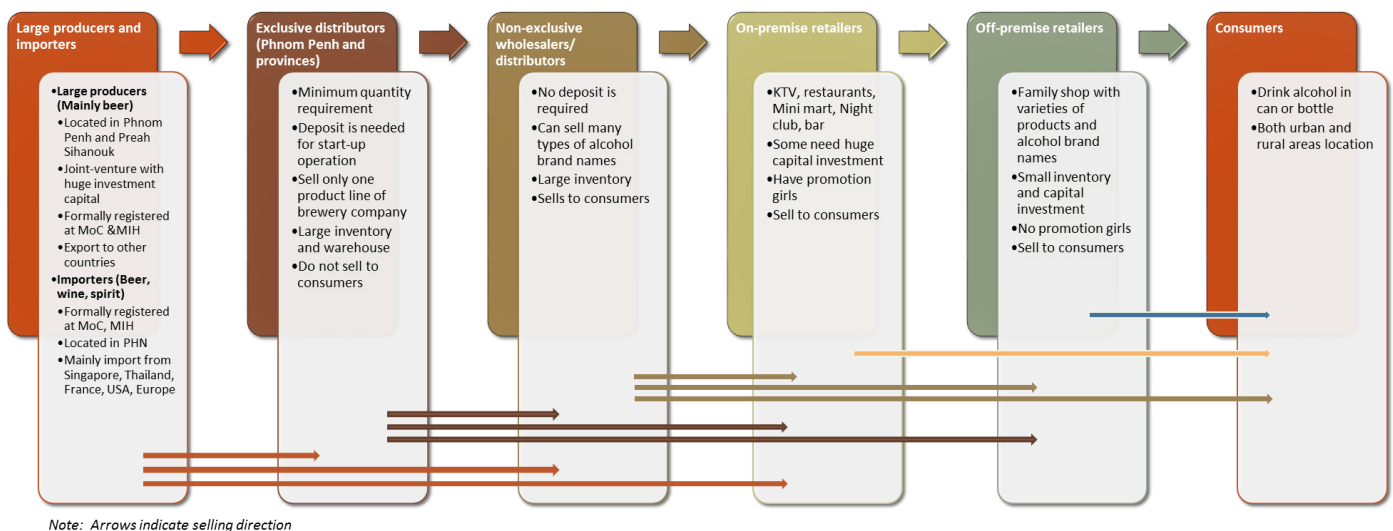
Large producers and importers

Large local producers and large importers are the main players in the alcohol industry in Cambodia. These enterprises have significant capital investment as well as influence within the sector. Large importers are politically connected and mostly import wines, beers and spirits. Most large enterprises produce beer, although there are enterprises emerging that produce wines and spirits, for example the Kirel brand produce pineapple palm wine and niche products for export. Large local producers and importers distribute and sell alcohol to exclusive distributors, non-exclusive wholesalers/wholesalers, and to on-premise retailers. Alcohol importers stated that they were required to buy minimum quantities of alcohol from suppliers.

Exclusive distributors are required to buy minimum quantities of alcohol from the large producers and importers. Start-up operations with large producers and importers require cash deposits. Exclusive distributors sell to non-exclusive distributors or wholesalers, on-premise retailers and off-premise retailers. They also sell to consumers in bulk for weddings and other special occasions.

Non-exclusive distributors or wholesalers are not required to buy minimum quantities from suppliers and cash deposits are not a requirement. They distribute and sell to on-premise retailers, off-premise retailers, and consumers. Figure 9 presents these distribution channels.

Figure 9: Alcohol Distribution Channels in Cambodia

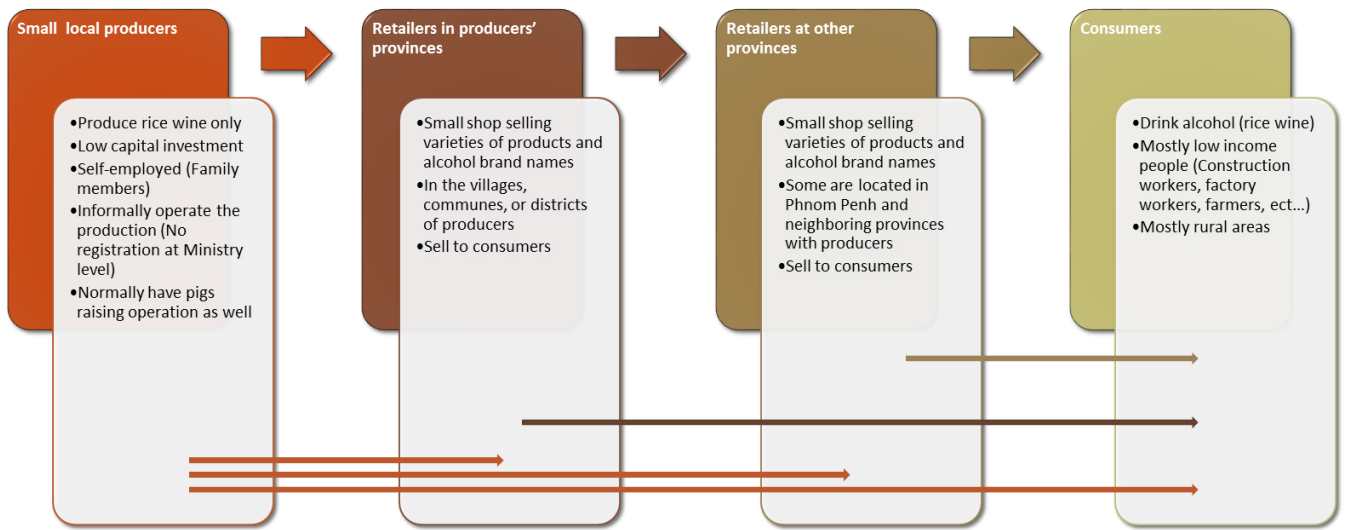


Small producers of rice wine

Small local producers mainly produce rice wine which is categorized as spirit. Rice wine production is informal and operates with low capital investment and without paid employees. These are mainly owner operated enterprises where family members are the workers. Often rice wine producers have other livelihood activities such as pig raising to support their households. Most small local producers distribute and sell their products to small retailers within the provinces while some of them distribute and sell to small retailers in other provinces. Consumers can buy direct from the producer as well (see Figure 10).

Small producers continue to be exposed to local level factors which determine levels of production and demand. In comparison, large producers have significant vested political and economic interests and are able to use extensive advertising to create brand recognition, to drive demand and thus profitability.

Figure 10: Rice Wine Distribution Channel in Cambodia



Note: Arrows indicate selling direction

6-Government revenues from alcohol

Alcohol related revenue are an important factor to consider in the context of potential legislative changes. Government revenue from the alcohol industry includes import and export duties, income tax and social security contributions collected from employers and employees in the alcohol industry. This section reviews the direct income earned by the government from imports and exports to Cambodia. There is no available government data on income earned from income taxes and social security contributions. Government data is difficult to access and unreliable given the weak enforcement of laws, including on import and export duties. The figures presented are thus conservative estimates. Informal discussions with importers suggest implementation of taxes and customs duties varies depending on the popularity of different alcoholic products. For example, a wine importer described how popular wines and champagnes are taxed at a higher rate and that consumers of these products will purchase them regardless of their price.

6.1-Government revenue from imports

Volumes of imported alcohol

From 2012 to 2014 alcohol imports increased alongside increased per capita rates of alcohol consumption (WHO, 2014). In 2014, there was a dramatic jump in beer imports (see Figure 11 below). In 2014, spirits, wine, and beer imports grew to 2.1 million litres, 1.6 million litres, and 32.3 million litres respectively. Relevant government departments were unable to explain this increase. It appears however, that in July 2016 a review of the sub-decree on Excise Tax Rates on Certain Merchandises was conducted and an increase in excise tax on 43 alcohol products from 20 per cent to 25 per cent was introduced (Chea, 2015). It is likely that alcohol products were imported in bulk in the first half of 2016 before the sub-decree and tax increase were put into effect in July 2016.

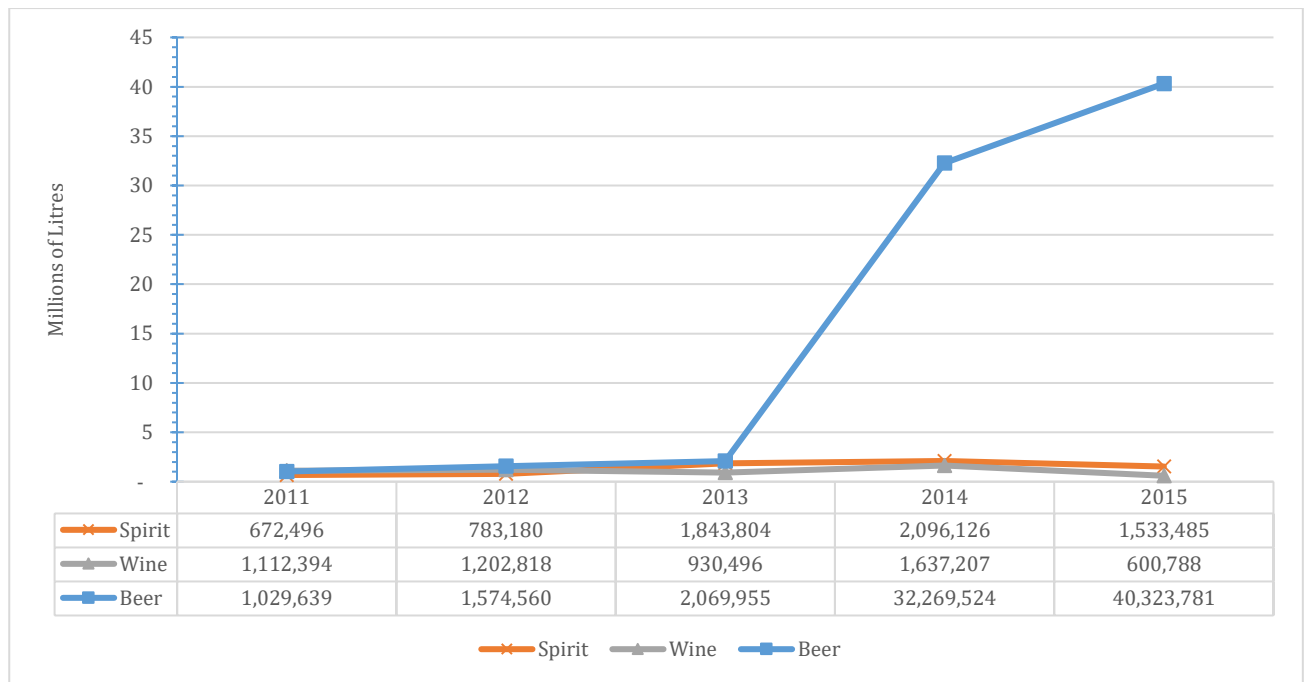
In 2015, spirit and wine plummeted to 1.5 million litres and 0.6 million litres respectively. The decline in wine and spirit imports could also be related to the implementation of the review on the sub-decree of Excise Tax Rates on Certain Merchandises. Although restrictions on alcohol advertisement during prime time viewing hours was introduced in 2015. It is unclear whether these advertising restrictions had an impact on the level of alcoholic imports or if data related to imports are inaccurate and do not capture data for products entering the country through informal channels.

Government revenue from alcohol imports

Actual data on government revenues from alcohol imports were not available from the Ministry, despite several requests to the relevant government departments. The estimated revenue from alcohol imports has been calculated based on import data and the following method has been used:

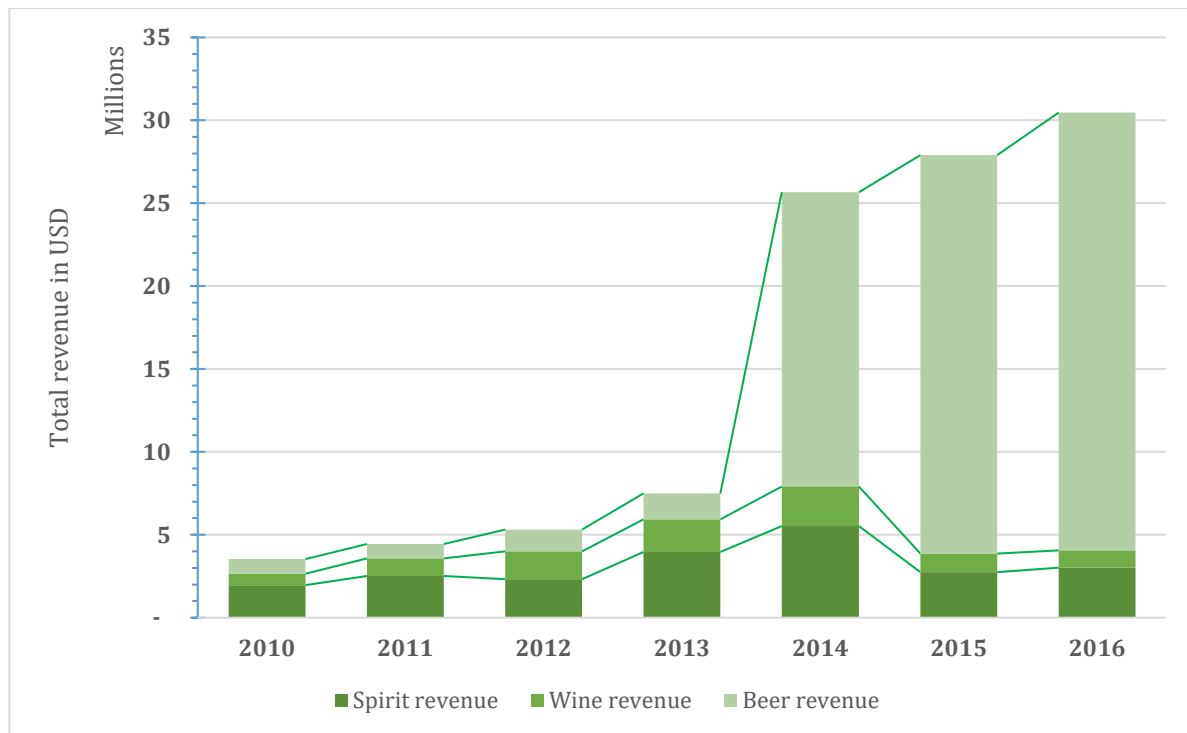
1. Custom duty revenue is the multiplication of custom duty rate with custom value in USD or national currency (For example: 15 per cent * USD 300,000 = USD 45,000).
2. Special tax revenue is the multiplication of special tax rate with the sum of custom value and custom duty revenue (For example: 20 per cent * (300,000+45,000) = USD 69,000).
3. VAT revenue is the multiplication of VAT rate with the sum of custom value, custom duty revenue, and special tax revenue (For example: 10 per cent * (300,000 + 45,000 + 69,000) = USD 41,400).

Figure 11: Volume of imported alcohol to Cambodia: 2011 to 2015



Source: Compiled from MEF, GDEC Statistics

Customs duty, special tax, and VAT are levied on alcohol imports. Revenue is thus the sum of these three charges. The research team verified the calculations with relevant government authorities to enable rough estimates to be made about revenues gained from imports. Total revenues from imported alcohol continue to increase year after year (Figure 12). As imported quantities of alcohol have increased so too has government revenue, primarily due to increased volumes of beer imports. While spirits and wine have traditionally contributed most significantly to revenues, since 2014 they have become less significant (Figure 13). Again, it is not possible to precisely understand the reason for these changes in the data and the contributions of each type of alcohol.

Figure 12: Total estimated government revenue from the import of beer, wine and spirits (2010 to 2016)¹⁴

Source: Calculated by using GDCE data

Figure 13: Percentage of revenue by spirit, wine, and beer import from 2010 to 2016¹⁵

Source: Calculated using GDCE data

¹⁴ It was assumed for calculation purposes that special tax on liquor and beer was increased to 35 per cent and 30 per cent respectively since January 1, 2016.

¹⁵ It was assumed for calculation purposes that special tax on liquor and beer was increased to 35 per cent and 30 per cent respectively since January 1, 2016.

Tables 9, 10 and 11 show government revenue from imported alcohol between 2010 and early 2016. The tax rate (per cent) and the custom value data from the General Department of Customs and Excise has been used to calculate total revenues.

Table 9: Total Revenue from Imported Spirits: 2010 to 2016

	2010	2011	2012	2013	2014	2015	2016 (Q1)
Custom value in USD	3,791,004	4,851,405	4,473,980	7,651,278	10,669,921	5,295,569	4,257,484
Custom duty (15 per cent)	568,651	727,711	671,097	1,147,692	1,600,488	794,335	638,623
Special tax (20 per cent & 35 per cent in 2016)	871,931	1,115,823	1,029,015	1,759,794	2,454,082	1,217,981	1,713,637
VAT (10 per cent)	523,158	669,494	617,409	1,055,876	1,472,449	730,788	660,974
Total revenues (exclude other fees)	1,963,740	2,513,028	2,317,522	3,963,362	5,527,019	2,743,105	3,013,234

Source: Calculated using GDCE data

Table 10: Total Revenue from Imported Wine: 2010 to 2016

	2010	2011	2012	2013	2014	2015	2016 (Q1)
Custom value in USD	1,325,414	2,052,151	3,269,531	3,792,344	4,603,240	2,183,328	1,470,292
Custom duty (15 per cent)	198,812	307,823	490,430	568,852	690,486	327,499	220,544
Special tax (20 per cent & 35 per cent in 2016)	304,845	471,995	751,992	872,239	1,058,745	502,165	591,793
VAT (10 per cent)	182,907	283,197	451,195	523,344	635,247	301,299	228,263
Total revenues (exclude other fees)	686,564	1,063,014	1,693,617	1,964,434	2,384,478	1,130,964	1,040,599

Source: Calculated using GDCE data

Table 11: Total Revenue from Imported Beer: 2010 to 2016

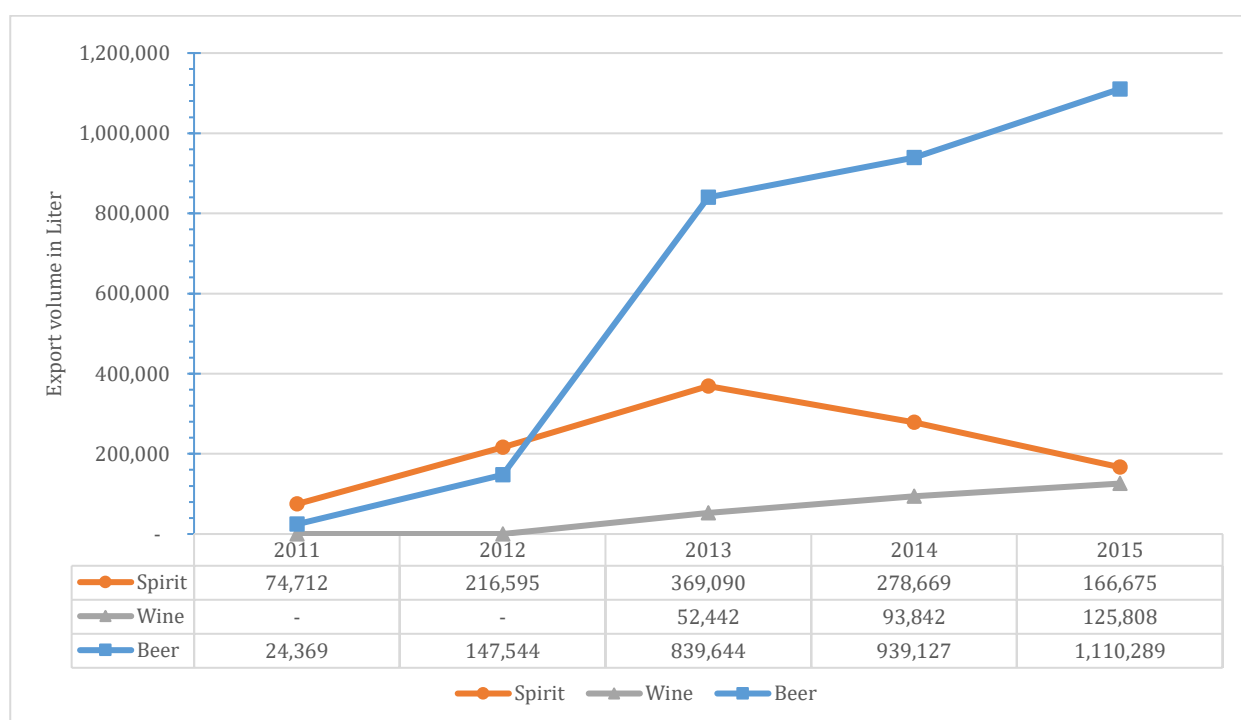
	2010	2011	2012	2013	2014	2015	2016 (Q1)
Custom Value in USD	1,031,671	1,007,450	1,516,164	1,840,902	20,721,464	28,068,305	28,383,418
Custom duty	361,085	352,608	530,658	644,316	7,252,513	9,823,907	9,934,196
Special tax	348,189	340,014	511,705	621,304	6,993,494	9,473,053	11,495,284
VAT	174,094	170,007	255,853	310,652	3,496,747	4,736,526	4,981,290
Total declaration (exclude other fees)	883,368	862,629	1,298,216	1,576,272	17,742,754	24,033,486	26,410,770

Source: Calculated using GDCE data

6.2-Government revenue from alcohol exports

Since 2011 exported volumes of alcohol show mixed results (see Figure 14). Beer exports have steadily increased over time with a significant jump in 2013 and climbing steadily ever since. Wine exports started from a zero base in 2011 – 2012 and steadily climbed to 126 thousand litres in 2015. Exported spirits have increased from 2011 - 2012 and reached a peak in 2013, however they declined rapidly since then. It is not clear why spirits exports have decreased.

Figure 14: Volume of exported alcohol (2011 to 2015)



Source: Compiled from MEF, GDEC Statistics

6.3-Tax and import duties, VAT and other special taxes on alcohol

In Cambodia, a 10 per cent value added tax is levied on all alcoholic products. Products are also subject to specific taxes on certain merchandise and services at the rate of 30 per cent and 35 per cent. Moreover, a customs duty rate of 15 per cent and 35 per cent is applied to liquor and beer respectively. From 1 April, 2016 however tax on alcoholic products increased notably with special tax rates increasing to 30 per cent for beer and 35 per cent for liquors (see Table 12).¹⁶

Table 12: Customs, special taxes and VAT on selected alcoholic products

Tariff code	Description of goods	Custom duty (per cent)	Special tax (per cent)	VAT (per cent)
2203.00.10	Stout or porter	35	30	10
2203.00.90	Other, including ale	35	30	10
2204.10.00	Sparkling wine	15	35	10
2208.50.00	Gin and Geneva	15	35	10
2208.20.50	Brandy	15	35	10
2208.60.00	Vodka	15	35	10

¹⁶ <http://cambodiaexpatsonline.com/newsworthy/taxes-beer-booze-and-ciggies-increase-t8170.html>

Tariff code	Description of goods	Custom duty (per cent)	Special tax (per cent)	VAT (per cent)
2208.20.90	Spirits obtained by distilling grape wine or grape marc others	15	35	10
2208.70.00	Liqueurs and cordials	15	35	10
2208.30.00	Whiskies	15	35	10
2204.21.11	Of an alcoholic strength by volume not exceeding 15 per cent volume	15	35	10
2204.29.11	Of an alcoholic strength by volume not exceeding 15 per cent volume	15	35	10

Source: Compiled data using customs tariffs of Cambodia 2012, General Department of Customs and Excise.

7-Conclusions and recommendations

Traditionally, Cambodians only consumed alcohol on specific occasions such as Khmer New Year, wedding parties, or other celebrations. In the last two decades these habits have changed however as the Cambodian economy has transformed from a centrally planned to a market economy integrated into regional and global trade regimes. With trade liberalisation and development, domestic and new foreign investment has been attracted into the Cambodian alcohol industry. Consequently, the scale and volume of alcohol production has increased alongside rising incomes and an increased number of imported alcoholic products. Growing market demand, profitability and consumption are driven by a cheap, highly televised and unregulated advertising industry. Furthermore, the Cambodian government earns a significant amount of revenue from import and other special duties and taxes on the alcohol industry. There are thus significant vested private and government interests in the maintenance of the status quo in the alcohol industry.

Large local producers and large importers are the main players in the alcohol industry in Cambodia. The largest producers of beer and importers of alcohol products have strong affiliations with the dominant political party - the Cambodian People's Party - through shareholding and influential relationships at the Ministerial level and with senior government officials. In practice this means that large producers are involved in various businesses with government officials, including Ministers and family members of high ranking officials. Through these relationship large producers can influence new laws and regulations. Alongside these politically and economically connected and powerful large producers are many small informal producers who run owner operated household businesses that support their livelihoods. However, the industry is driven by the interests of large producers who are embedded within the political architecture of the Cambodian government and associated financial profits.

Gendered patterns of alcohol consumption

Alcohol consumption patterns in Cambodia are distinctly gendered with men's consumption six times greater than women's. Not only does alcohol consumption increase women's vulnerability to intimate partner violence but women typically carry the financial and health related impacts of men's consumption patterns. Socio-economic and cultural factors are important drivers of men's current patterns of alcohol consumption. Additionally, the role of the advertising industry in shaping consumer decision-making is strong, particularly in the absence of any enforced advertising regulations. The provision of consumer and health warning messages would be a step in the right direction but on their own are insufficient to change men's current drinking behaviour.

Regulation of the alcohol industry: advertising restrictions and price controls

Alcohol advertising is a major source of revenue particularly for TV stations. National television is the biggest income source in the advertising industry and it is estimated that advertising revenues will exceed US \$100 million per year in the coming years. Although in 2015 a Ministerial directive aimed to curtail advertising on TV during peak viewing hours came into force, it is not legally binding, lacks penalties and enforcement measures for non-compliance. There are no restrictions or regulations for alcohol merchandising, promotion and sponsorship. Furthermore, the replacement of alcohol advertisements with other advertisements on television will be very difficult to achieve given current Cambodian TV viewer preferences and program selection. The development of more educational programming may represent greater opportunities to replace alcohol advertising and to promote the safe use of alcohol. This will require specific strategies to shift program selection however and will take time to achieve.

The introduction of restrictions on alcohol product advertisements has had mixed results in ASEAN nations. In many countries the content, time, place, and messaging of alcohol advertising is restricted but the effectiveness of such regulations is debatable. Advertising restrictions need to be one strategy amongst a broader sweep of initiatives to regulate the alcohol industry in Cambodia. Additional strategies that target the alcohol industry, economic and socio-cultural factors are also required. Greater examination of how notions of masculinity and power are played out through alcohol would be helpful to identify new messaging to reduce consumption and promote more positive patterns of masculinity, socialisation and networking.

Price control strategies aim to reduce alcohol consumption by introducing financial measures to deter consumers from purchasing and consuming alcohol. A variety of price control measures include minimum pricing, bans on below

cost sales, and multi-buy promotions and were reviewed as part of this study. The research literature shows that minimum pricing, price control strategies and bans on below cost sales have little impact on existing patterns of alcohol consumption. Cambodia does not have any price control regulations at present. In the Cambodian context price control strategies particularly for the products of large producers warrants more in-depth study to identify whether or not such policies would effectively reduce the negative social and health impacts of alcohol consumption. Any efforts to control prices are likely to encounter resistance from the private sector and on their own are unlikely to change current consumption patterns.

Government revenue

This study attempted to calculate government revenues from the import of alcohol but limited data were publicly available. Conservative estimates put government revenue at between US \$30 – 40 million dollars from import and related taxes annually. Total revenue from imported alcohol continue to increase year after year. There is little incentive for the government to alter this valuable revenue stream. It is thus in government interests to ensure current levels of demand for alcohol products continue.

This study has demonstrated that political, economic, cultural and social factors together with the advertising industry shape the nature of the alcohol industry in Cambodia. Strategies to reduce the multiple negative and gender specific health and social impacts of alcohol consumption need to be tailored to the specific context and development characteristics of Cambodia.

Recommendations

A harm reduction alcohol advertising initiative would be an appropriate way to promote a responsible alcohol industry. A joint public-private partnership between the government and peak industry representatives would be appropriate. Health messages, consumer warnings and protection could be integrated to provide consumers with better access to information and knowledge to enable them to make more informed decisions regarding their drinking habits.

Such an initiative could be implemented in the following ways:

1. Set enforceable standards on advertising and health messaging as a requirement for alcohol advertising, for example, the size and viability of public billboards and televised material. Relevant ministries articulate key health and consumer protection messages that identify the long term health consequences of drinking and promote responsible alcohol consumption. Strictly enforced blood alcohol levels for driving are urgently required.
2. The government could generate TV advertisements related to negative health and other consequences of alcohol abuse and enforce a law that requires these government health adverts to be aired for every 2 adverts aired by alcohol company. Alcohol product advertisement should include health warnings promoted as a part of being a socially responsible business.
3. The government could to generate posters on health, traffic and other warnings related to alcohol that are displayed in all establishment that sell alcohol.

Each of interventions requires that Government and industry partners take an engaged, proactive and legally enforced role to build a responsible alcohol industry where consumers are protected from the an entirely unregulated advertising industry. Acceptance of the new Alcohol Law is a critical step to make these guidelines legally binding and enforceable.

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Appendix 1- Contact list of importers

No	Types of alcohol	Its brand name	Company Name	Contact details	Address
1	Beer	Leo and Singha	Kingdom Breweries (Cambodia) Ltd.	023 430 180	No. 1748, National Road No 5, 12104 Phnom Penh
2	Beer	Corona Extra	Attwood Import Export Co., Ltd.	023 890 769/023 890 770	N. 23, Confederation de la Russie, Attwood Business Center 12102 Phnom Penh
3	Beer	Black Cat Lager Beer, Black Cat Extra Stout	Lao Hang Heng Wine Co., Ltd	023 215 737/012 946 600	No. 169, Mao Tse Toung Blvd, 12308 Phnom Penh
4	Beer	333 premium and Saigon beer	Representative Office of Sabeco in Phnom Penh, (VN company)	023 6872 286	
5	Wine	Rondonal	Rondonal Exclusive Distributor	023 426 868/012 866 288/016 837 325	No. 16A, National Road No 5, Sangkat Russey Keo, Khan Russey Keo, 12104 Phnom Penh
6	Wine	Curtis	Uniqe Wine Cambodia	092 997 711/098 997 711/092 998 800	No. 77D, Samdech Monireth Blvd (217), 12159 Phnom Penh
7	Wine	Red Knot	DNNS Trading	023 5555 390/099 222 406	No. S-02, Promenade (St.), Ratana Plaza, Sangkat Teuk Thla, 12102 Phnom Penh
8	Wine	Wines from Australia, Chile, France, Italy, Spain & Argentine	Boolum Boolum Co.,Ltd.	023 6498 999	No. 18Eo, St. 123, Sangkat Boeung Trabek, Khan Chamkar Morn, 12305 Phnom Penh
9	Wine	Red wine and white wine and Champagne	IDD - International Diversity Distributor	017 292 266/096 3636 168	No. 63, St. 118, Sangkat Teuk Laak I, Khan Toul Kork, 12156 Phnom Penh
10	Wine	Red wine and white wine from France	The Wine Collection	012 300 600 023 881 610	No. 22-24, St. 586, Sangkat Boeung Kak II, Khan Toul Kork, 12152 Phnom Penh
11	Spirit	Special Muscle Wine	Lao Hang Heng Wine Co., Ltd	023 215 737/012 946 600	No. 169, Mao Tse Toung Blvd., 12308 Phnom Penh
12	Wine	Varieties of wine	Chhivtimex Group (Duong Chhiv Im-Ex & Transport) Co., Ltd.	023 885 388/023 881 838/012 838 898	No. 92ABC, Confederation de la Russie Blvd (110), 12156 Phnom Penh
13	Spirit	Henessy	Attwood Import Export Co., Ltd.	023 890 769 023 890 770	
14	Spirit	Wine and Spirit	Golden Sunshine (Cambodia) Co., Ltd.	0236 923 181/097 9893 888	No. 82, St. 71, Sangkat Boeung Tumpun, Khan Meanchey, 12351 Phnom Penh
15	Spirit	France's premier red wine (Bordeaux)	Richline Wine & Spirit Corporation	016 677 246	No. 15, St. 608, 12152 Phnom Penh
16	Spirit	Hunter Wine & Black Hawk Wine	Mayland Hunter International	012 912 219/023 6365 819	No. 313AB, Chom Chao (St. 217), Phnom Penh
17	Spirit	Wine and Spirit	Celliers d'Asie (ឧត្តមសុខាណុន)	023 986 350 /012 811 419	No. 62B, St. 432, Sangkat Toul Tum Pong II, Khan Chamkar Morn, 12311 Phnom Penh