

Kingdom of Cambodia
National Religion King



Prakas
On
Nutrition Information Requirements
for the Labelling of Pre-packaged Food Products

Minister of Commerce

- Having seen the Constitution of the Kingdom of Cambodia,
- Having seen the Royal Decree No. NS/RKT/0918/925 dated 06 September 2018, on the Appointment of the Royal Government of the Kingdom of Cambodia,
- Having seen the Royal Decree No. NS/RKT/0320/421 dated 30 March 2020, on the Appointment and Adjustment to the Composition of the Royal Government of the Kingdom of Cambodia,
- Having seen the Royal Kram No. NS/RKM/0618/012 dated 28 June 2018, promulgating the Law on the Organization and Functioning of the Council of Ministers,
- Having seen the Royal Kram No. NS/RKM/0196/16 dated 24 January 1996, promulgating the Law on the establishment of the Ministry of Commerce,
- Having seen the Royal Kram No. NS/RKM/0600/001 dated 21 June 2000, promulgating the Law on the Management of Quality and Safety of Products and Services,
- Having seen the Royal Kram No. NS/RKM/1119/016 dated 02 November 2019, promulgating the Law on Consumer Protection,
- Having seen the Sub-Decree No.38 ANKR.BK dated 16 March 2020 on Organization and Functioning of the Ministry of Commerce,
- Having seen the Sub-Decree No.38 ANKR.BK dated 27 August 2020 on the Organization and Functioning of the National Commission for Consumer Protection,
- Referring to the request of Minister of Commerce,

Hereby Decides

Article 1.–

The Prakas sets out the nutrition information requirements for the labelling of pre-packaged food products to ensure that food is not circulated in the market in a fraudulent or deceptive manner in order to protect the welfare of consumers and promote fair practices in food trade.

Article 2.–

The Prakas applies to pre-packaged food products that describe the nutrients information on the labels which is imported, manufactured, processed, packaged, distributed for the circulation in the Kingdom of Cambodia.

Article 3.–

The key terms used in the Prakas are defined in the glossary attached in Appendix 1 of the Prakas.

Article 4.–

Food business operators are responsible for their food products that are imported, manufactured, processed, packaged and distributed for circulation in the markets by ensuring that they meet quality, safety and labeling requirements in accordance with applicable laws and regulations.

Article 5.–

Nutrients information providing on the label of pre-packaged food products is a voluntary practice.

All nutrients information provided on the label of food products shall be in Khmer or additionally be attached in Khmer language and should not be presented or described in a false, misleading, or deceptive or is likely to create an erroneous impression regarding its character in any respect to the consumers.

On the label of food products shall not allow to use words, pictorial or other means which refer to or are suggestive either directly or indirectly, of any other product with which such food might be confused, or in such a manner as to lead the purchaser or consumer to suppose that the food is connected with such other product.

Article 6.–

Food business operators who wish to provide nutrition information on the labels of their pre-packaged food product shall comply with the following requirements:

1. Nutrition Declaration related to:
 - a. Energy values

- b. Amount of protein, available carbohydrate (excluding dietary fiber), total fat, saturated fat, sodium (or sodium salt) and total sugars.
 - c. The amount of other nutrients for which nutrient claim or nutrient function claim is made.
 - d. The amount of any other nutrients that is considered relevant to maintaining optimal nutritional status as required by national law or national dietary guidelines.
2. In addition to the declaration as stated in point 1 above, vitamins and minerals are allowed to be listed in accordance with the following criteria:
 - Shall also be declared only vitamins and minerals for which recommended intakes have been established and/or which are of nutritional importance in the national dietary requirements.
 - It is not necessary to declare, vitamins and minerals which are present in amounts less than 5% of the Nutrient Reference Value per 100 g or 100 ml or per serving as quantified on the label.
3. All nutrients declaration shall be given in a specific number and be expressed in metric units as shown in Appendix 2 of the Prakas.

Article 7.–

All nutrients information provided on the label of food product is subject to the following principles:

1. The amount of energy and protein is calculated by using the conversion factors as shown in the table in Appendix 3 of the Prakas.
2. The amount of energy values, protein, carbohydrates and fats shall be given in specific number by expressed in metric units.
3. The amount of micronutrients such as vitamins and minerals shall be given in numerical information by expressed in metric units. These micronutrients may be allowed to express in percentage of the nutrient reference value for labelling purposes to help consumers make choices that contribute to an overall healthful dietary intake.
4. The nutrient reference value (NRV) required to be used in the declaration of micronutrients in the nutrition labeling is based on the nutrient reference values-requirement specified in Codex Guideline CAC / GL2-1985 as shown in Appendix 4. Other nutrient reference values which are not specified in Appendix 4 may be used if those reference values are developed and recognized by national or international institutions.

Article 8.–

All foods that labelled to have a certain nutrient claim or nutrient function claim are required to provide information on that nutrient on the label as defined in Article 6 of the Prakas. Nutrient claims are permitted only for those nutrients that relate to energy, protein, carbohydrates,

fats, and their components, fiber, sodium, and vitamins and minerals for which Nutrient Reference Value (NRVs) have been established.

For Nutrient Content Claims on food labels, some requirements are as follows:

1. Nutrient Content Claims by using words such as "Source", "High", "Low", "Very low", "Free" shall comply with the conditions set out in Appendix 5.
2. Nutrient Comparative Claims using words such as "Reduced", "Less than", "Fewer", "Increased", "More than", "Ligh", "Extra" shall comply with certain conditions in Appendix 6 and in accordance with some of the following principles:
 - a. The foods being compared should be different versions of the same food or similar foods. The foods being compared should be clearly identified
 - b. The amount of difference related to the same quantity, expressed as a percentage, fraction, or an absolute amount. A comparison of the energy value and the amount of nutrients to be different shall be in accordance with the requirements set out in Appendix 6.
3. Non-Addition of Sugars Claim

Claims regarding the non-addition of sugars to a food may be made provided the following conditions are met:

- a. No sugars of any type have been added to the food such as sucrose, glucose, honey, molasses, corn syrup, etc.;
 - b. The food contains no ingredients that contain sugars as an ingredient such as jams, jellies, sweetened chocolate, sweetened fruit pieces, etc.;
 - c. The food contains no ingredients containing sugars that substitute for added sugars such as non-reconstituted concentrated fruit juice, dried fruit paste, etc.; and
 - d. The sugars content of the food itself has not been increased above the amount contributed by the ingredients by some other means such as the use of enzymes to hydrolyze starches to release sugars.
4. Nutrient Function Claim

A nutrient function claim shall not imply or include any statement to the effect that the nutrient would afford a cure or treatment for or protection from disease.

Article 9.–

The criteria set out for the tolerable level that acceptable between the differences of the analytical results and the nutrient declared or nutrient claim on the product label is set out in Appendix 7.

The values used in nutrient declaration should be weighted average values derived from data specifically obtained from analyses of products which are representative of the product being labelled.

In those cases where a product is subject to a national or international standard, requirements for tolerances for nutrient declaration established by the standard should take precedence over these Prakas.

Article 10.–

Food business operators shall provide accuracy nutrient information in accordance with the requirements set out in the Prakas.

In case there is improper implementation, the food business operators will be punished as stated in the Law on Consumer Protection and other regulations in force.

Article 11.–

Any provisions that are contrary to this Prakas shall be abrogated.

Article 12.–

The Prakas is effective from June 1, 2022 onwards.

Article 13.–

The composition of the National Commission for Consumer Protection, the Director of the Cabinet, Delegate of the Royal Government of Cambodia, in charge as the Director General of the Consumer Protection Competition and Fraud Repression Directorate-General and the Chairpersons of all relevant institutions shall be responsible for the implementation of the Prakas according to their respective duties.

Tuesday, the 6th Day of the waning moon of the 3rd month,
in the year of the Ox, Trei Sak, B.C. 2565

Phnom Penh, 22 February 2022
Minister of Commerce
[Signed]

PAN SORASAK

Recipients:

- General Secretariat of the Constitutional Council
- Cabinet of Samdech Akka Moha Sena Padei Techo Prime Minister
- Cabinet of Samdech, His Excellency and Her Excellency the Deputy Prime Ministers
- Capital and Provincial Administration
- Cambodia Chamber of Commerce
- As stated in Article 13
- Royal Gazettes
- Documentation and Archive

Appendix 1 of Prakas No. 0059P.N.A.KBB.BRK dated 22 February 2022

Glossary

1. **Nutrition labelling** refers to a display or description intended to inform the consumer of nutritional properties of a food.
2. **Nutrition declaration** refers to a standardized statement or listing of the nutrient content of a food.
3. **Nutrition claim** refers to any representation which states, suggests or implies that a food has particular nutritional properties including but not limited to the energy value and to the content of protein, fat and carbohydrates, as well as the content of vitamins and minerals. The following do not constitute nutrition claims:
 - a. the mention of substances in the list of ingredients;
 - b. the mention of nutrients as a mandatory part of nutrition labelling;
 - c. quantitative or qualitative declaration of certain nutrients or ingredients on the label if required by national legislation.Nutrition claims can be nutrient content claims, nutrient comparative claim, non-addition claims, and nutrient function claims.
4. **Nutrient content claim** refers to a nutrition claim that describes the level of a nutrient contained in a food. (Examples: “source of calcium”; “high in fibre and low in fat”.)
5. **Nutrient comparative claim** refers to a claim that compares the nutrient levels and/or energy value of two or more foods. (Examples: “reduced”; “increased”; “less than”; “more than”; “fewer”.)
6. **Non-addition claim** refers to any claim that an ingredient has not been added to a food, either directly or indirectly. The ingredient is one whose presence or addition is permitted in the food and which consumers would normally expect to find in the food.
7. **Nutrient function claim** refers to a nutrition claim that describes the physiological role of the nutrient in growth, development and normal functions of the body.
8. **Nutrient** refers to any substance normally consumed as a constituent of food which provides energy; or is needed for growth, development and maintenance of life; and a deficit of which will cause characteristic bio-chemical or physiological changes to occur. Generally, nutrients are the substances in food which are the composition or a part of groups of proteins, carbohydrates, fats, dietary fiber, vitamins and minerals.
9. **Carbohydrates** refer to available carbohydrates that provide energy, excluding fiber.
10. **Nutrient Reference Values (NRVs)** refers to a set of numerical values that are based on scientific data for purposes of nutrition labelling and relevant claims. They comprise the following two types of NRVs: Nutrient Reference Values - Requirements (NRVs-R) and Nutrient Reference Values – Non-communicable Disease (NRVs-NCD).

11. **Nutrient Reference Values - Requirements (NRVs-R)** refer to NRVs that are based on levels of nutrients associated with nutrient requirements.
12. **Nutrient Reference Values – Non-communicable Disease (NRVs-NCD)** refer to NRVs that are based on levels of nutrients associated with the reduction in the risk of diet-related noncommunicable diseases not including nutrient deficiency diseases or disorders.
13. **Food circulated in the markets** refers to food that is occupied for the purpose of sale, including offers for sale or other forms of remittance, whether free of charge or for sale and distribution.
14. **Consumer** refers to an individual or group that buys or receives food to meet personal needs.
15. **Requirements** refer to the criteria set down by the competent authorities relating to trade in foodstuffs covering the protection of public health, the protection of consumers and conditions of fair trading.
17. **Food business operator** refers to a natural person or legal person, both for profit and non-profit, related to the production, processing, trade, processing, packaging, warehousing, food service, gift giving (as food) or do pre-packaged food business.

Appendix 2 of Prakas No. 0059P.N.A.KBB.BRK dated 22 February 2022

International Metric Units Required for Nutrients Declaration

No.	Component	Measurement Unit (Solid Food)	Measurement Unit (Liquid Food)
1	Energy	kcal/100g [kJ/100g]	kcal/100ml [kJ/100ml]
2	Protein	g/100g	g/100ml
3	Carbohydrates	g/100g	g/100ml
4	Total fat	g/100g	g/100ml
5	Saturated fat	g/100g	g/100g
6	Sodium (Sodium Salt)	g/100g	g/100ml
7	Total sugar	g/100g	g/100ml

In addition to the declared amounts per 100 g (for solid foods) or 100 ml (for liquid foods) as listed in the table above, the nutrition information is also allowed to provide in the amounts per serving as quantified in the label or per portion provided that the number of portions contained in the package stated.

Appendix 3 of Prakas No. 0059P.N.A.KBB.BRK dated 22 February 2022

Conversion Factors for Calculating the Energy Value for Nutrients and Proteins**1. Conversion factors for calculation of energy value:**

Nutrients	Amount	Conversion Factor	
		kcal	kJ
Carbohydrates	1g	4	17
Protein	1g	4	17
Fat	1g	9	37
Ethanol	1g	7	29
Organic Acid	1g	3	13
Energy Value of Nutrient = Quantity of Nutrient (in gram) X Conversion factor			

2. Conversion factors for calculation of protein

Type of Food	Conversion Factor
Barley, Oats, Ryes, Wheat	5.83
Wheat flour	5.70
Rice	5.95
Peanut, Ground nut	5.46
Soya bean	6.25
Cashew nut, Tree nut	5.30
Milk	6.38
Protein = Total Nitrogen X Conversion factors for specific food¹	

¹ The conversion factor for a particular food shall be taken in accordance with the specifications of the codex standard, unless there is another conversion factor provided by the national standard or food analysis method.

Appendix 4 of Prakas No. 0059P.N.A.KBB.BRK dated 22 February 2022

Nutrient Reference Values-Requirements (NRVs-R) for using in Nutrition Declaration
(Refer to Codex Guideline on Nutrition Labeling CAC/GL2-1985)

Nutrient Component	Unit	NRVs Value
Vitamins		
- Vitamin A	(µg RAE or RE)	800
- Vitamin D	(µg)	15
- Vitamin C	(mg)	100
- Vitamin K	(µg)	60
- Vitamin E	(mg)	9
- Thiamin or Vitamin B1	(mg)	1.2
- Riboflavin or Vitamin B2	(mg)	1.2
- Niacin or Vitamin B3	(mg NE)	15
- Pyridoxine or Vitamin B6	(mg)	1.3
- Folic acid or Vitamin B9	(µg DFE)	400
- Cyanocobalamin or B12	(µg)	2.4
- Pantothenic acid or B5	(mg)	5
- Biotin or B7	(µg)	30
Minerals		
- Calcium	(mg)	1000
- Magnesium	(mg)	310
- Iron	(mg)	14
- Zinc	(mg)	11
- Iodine	(µg)	150
- Copper	(µg)	900
- Selenium	(µg)	60
- Manganese	(mg)	3
- Molybdenum	(µg)	45
- Phosphor	(mg)	700
Others		
- Protein	(g)	50

Appendix 5 of Prakas No. 0059P.N.A.KBB.BRK dated 22 February 2022

Conditions for Nutrient Content Claim

Components	Claim	Requirement (not more than)
Energy	Low	• Solid food: 40kcal (170kJ)/100g • Liquid food: 20kcal (80kJ)/100ml
	Free	• Liquid food: 4kcal (17kJ)/100ml
Fat	Low	• Solid food: 3g/100g • Liquid food: 1.5g/100ml
	Free	• Solid food: 0.5g/100g • Liquid food: 0.5g/100ml
Saturated Fat	Low	• Solid food: 1.5g/100g • Liquid food: 0.75g/100ml
	Free	• Solid food: 0.1g/100g • Liquid food: 0.1g/100ml
Cholesterol	Low	• Solid food: 0.02g/100g • Liquid food: 0.01g/100ml
	Free	• Solid food: 0.005g/100g • Liquid food: 0.005g/100ml
Sugar	Free	• Solid food: 05g/100g • Liquid food: 0.5g/100ml
Sodium	Low	0.12g/100g or 100ml
	Very low	0.04g/100g or 100ml
	Free	0.005g/100g or 100ml
Component	Claim	Requirement (not less than)
Protein	Source	• Solid food: 10% of NRV/100g • Liquid food: 5% of NRV/100ml or 5% of NRV/100kcal
	High	2 times of values for “source”
Vitamins and Minerals	Source	• Solid food: 15% of NRV/100g • Liquid food: 7.5% of NRV/100ml or 5% of NRV/100kcal
	High	2 times of values for “source”
Dietary Fiber	Source	• Solid food: 3g/100g • Liquid food: 1.5g/100ml
	High	2 times of values for “source”

Appendix 6 of Prakas No. 0059P.N.A.KBB.BRK dated 22 February 2022

Conditions for Nutrient Comparative Claim

Component	Requirement	
	Minimum Relative Difference	Minimum Absolute Difference
Energy	25%	• Solid food: not less than 40kcal (170kJ)/100g • Liquid food: not less than 20kcal (80kJ)/100ml
Protein	25%	• Solid food: not less than 10% of NRV/100g • Liquid food: not less than 5% of NRV/100ml or not less than 5% of NRV/100kcal
Total Fat	25%	• Solid food: not less than 3g/100g • Liquid food: not less than 1.5g/100ml
Saturated fatty acids	25%	• Solid food: not less than 1.5g/100g • Liquid food: not less than 0.75g/100ml
Cholesterol	25%	• Solid food: not less than 0.02g/100g • Liquid food: not less than 0.01g/100ml
Sugars	25%	• Solid food: not less than 0.5g/100g • Liquid food: not less than 0.5g/100ml
Sodium	25%	• Solid food: not less than 0.12g/100g • Liquid food: not less than 0.12g/100ml
Dietary fiber	25%	• Solid food: not less than 3g/100g • Liquid food: not less than 1.5g/100ml
Vitamins and Minerals	10% NRV	• Solid food: not less than 15% of NRV/100g • Liquid food: not less than 7.5% of NRV/100ml or not less than 5% of NRV/100kcal

Appendix 7 of Prakas No. 0059P.NAKBB. BRK dated 22 February 2022

Tolerance Limits for Declaration of Micronutrients and Macronutrients

Energy/ Nutrient	Tolerance Limits
- Protein - Total carbohydrates - Dietary fiber - Unsaturated fats	At least 80% of declared value on label
- Energy - Total sugar - Total fat - Saturated fat - Trans fat - Cholesterol	80-120% of declared value on label
- Sodium	80-120% of declared value on label
- Natural Vitamins and Minerals	At least 80% of declared value on label
- Additive Vitamins and Minerals	At least 100% of declared value on label