

June 1, 2020

## Joint Statement on the Enforcement of Sub-Decree 133 Implementation in Cambodia

On behalf of Helen Keller International (HKI), the World Health Organization (WHO) and the United Nations Children's Fund (UNICEF), we commend the strong actions of the Royal Government of Cambodia and the Ministry of Health against four separate companies (**Royal Platinum Co. Ltd., Nutrilatt, LMM Distribution, and VVH Import Expert**) found in violation of Cambodia's Sub-Decree 133 during the COVID-19 pandemic, between March and May 2020. Monetary penalties were imposed upon these violators, ranging from 2,500,000 – 5,000,000 Riel (US\$625 – US\$1250), depending on how many times they had offended. These companies had repeatedly promoted breast-milk substitutes, in violation of The International Code of Marketing of Breast-milk Substitutes, and Cambodian Sub-Decree 133 on the Marketing of Products for Infant and Young Child Feeding, hence endangering the lives of infants and young children in the Kingdom of Cambodia.

We would like to take this opportunity to congratulate the Royal Government of Cambodia and the Ministry of Health for taking this pivotal action to protect the health and wellbeing of Cambodian children, particularly during the COVID-19 crisis. At the same time, we strongly condemn the violators who took advantage of the current situation for their own gain.



The COVID-19 pandemic highlights the need for stronger legislation to protect families from false claims about the benefits and safety of breast-milk substitutes or aggressive marketing practices that undermine breastfeeding. More actions are required to enforce the call from WHO, UNICEF and the Cambodian Ministry of Health for exclusive breastfeeding for the first six months of a child's life, and continued breastfeeding until two years of age or beyond.

According to The Lancet 2016, scaling up appropriate breastfeeding practices could prevent an estimated 832,000 child deaths globally each year. Breastfeeding greatly contributes to children's physical and cognitive development, protects against infection, and strengthens a child's immune system. This is particularly important during the COVID-19 pandemic.

Sub-Decree 133 plays a critical role in promoting and protecting the nutrition and health of children in Cambodia, by monitoring and restricting the advertising, marketing and labeling of infant and young child feeding products, including infant formula and other breast-milk substitutes. Since the establishment of the National Oversight Board and the Executive Working Group for Sub-Decree 133 in 2014, the Royal Government of Cambodia has worked hard to improve monitoring and enforcement of Sub-Decree 133 despite challenges such as limited resources.

Sub-Decree 133 helps protect Cambodian children and their families from misleading and inappropriate promotion of infant formula and other breastmilk substitutes. The Sub-Decree was first developed in 2001 by the Infant and Young Child Feeding Technical Working Group, led by the National Nutrition Program of the National Maternal and Child Health Center, under the Ministry of Health. Prime Minister Samdech Akka Moha Sena Padei Techo Hun Sen approved the Sub-Decree on November 18, 2005. In 2014 the Royal Government of Cambodia renewed its dedication to protecting and promoting breastfeeding through the monitoring

and enforcement of Sub-Decree 133. The Sub-Decree is enforced through joint efforts, led by the Ministry of Health and in conjunction with the Ministry of Commerce, Ministry of Information, and Ministry of Industry and Handicraft. Effective monitoring and enforcement of the Sub-Decree requires taking action against violators. Doing so will ultimately result in better prospects and futures for the children of Cambodia. We applaud the continued dedication and commitment of the Royal Government of Cambodia and the Ministry of Health in their efforts to protect and promote children's wellbeing and nutrition, especially during this difficult time of global COVID-19 pandemic.

  
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Dr. L. Ailan  
Representative, WHO  
Date: 29.06.20  
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Mr. Gianfranco Rotigliano  
Representative-a.i, UNICEF  
Date: 29.06.20  
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Ms. Gwyneth Cotes  
Country Director, Helen Keller Int.  
Date: 29.06.20

**Copy to:**

- H.E Prof. Eng Huot, Secretary of State for Health & Chair of Oversight Board for Sub Decree 133
- H.E Prof. Thir Kruey, Secretary of State for Health & Chair of Control Committee for the Content of Marketing of Products for IYCF
- H.E Prof. Oum Samol, Under-Secretary of State for Health & Chair of Executive Working Group for Sub Decree 133
- H.E. Dr. Prak Sophonneary, Under Secretary of State, Ministry of Health
- Dr. Chea Mary, Manager of National Nutrition Program, NMCHC, Ministry of Health
- Ph. Aing Hoksrun, Chief of Food Safety Bureaus, DD, Ministry of Health
- SUN CSA Cambodia members

**For information, please contact:**

Mr. Hou Kroeun, Deputy Country Director, HKI  
095 432 425

Dr. Phal Sano, Technical Officer for Newborn and Child Health  
Health Systems Development, WHO  
012 505 566

Mr. Un Sam Oeurn, Nutrition Officer, UNICEF  
012 914 327