



ASSESSMENT REPORT

LABOR RIGHTS IN CEMENT SECTOR



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Cambodia has undergone remarkable transformation, emerged from three decades of the genocidal regime (Khmer Rouge), civil war, and internal conflict from the late 1960s to the 1990s. The US-Cambodia bilateral Trade Agreement (1999- 2004), “Every Thing but Arms” (EBA) in 2011 under the European Union’s (EU), US’s Generalized Scheme of Preferences (GSP) were meant to insert Cambodia’s economy into the global economy and facilitate the country’s transition from a centrally planned economy to a free-trade economy. In 1993 after the creation of the Royal Government of Cambodia in its first term from the national election under supervision and support of The United Nations Transitional Authority in Cambodia (UNTAC) which was recognized as the free and fair election; the Department of Occupational Safety and Health was established within the Ministry in charge of Labour and implemented the 1992 Labour Code on a temporary basis until after the Labour Law was promulgated in 1997. Chapter VIII of the Labour Law concerning Health and Safety of Workers largely provides for the Ministry in charge of Labour to develop Prakas and other regulations with a view to monitoring the working conditions which ensure OSH for workers. These steps are in line with the new ILO’s Promotional Framework for Occupational Safety and Health Convention (No 187) 2006 and its accompanying Recommendation (No 197) adopted at the 95th Annual Conference of the ILO in June 2006.

As a member state of the International Labour Organization (ILO), Cambodia has taken many positive, collaborative actions with the ILO, through the development of 5-year-OSH master plan; the first OSH Master Plan 2009-2013, Second 2018-2022, and the third Occupational Safety and Health (OSH) Master Plan for Cambodia, 2023-2027. The construction industry has experienced strong growth since Cambodia opened up to foreign investment in the 1990s. Along with garments, rice and tourism, the construction sector is one of the four pillars of the nation’s economy. The construction sector in Cambodia employs an estimated 200,000 to 250,000 workers. A significant portion of these workers, estimated to be between 30% and 35%, are women. The industry is a major source of employment in Cambodia, but it also faces challenges related to worker safety, health, and formalization. According to Minister of Ministry of Labour and Vocational Training (MLVT), there are only 10 to 15% of them in the formal system, while 80% working onsite are subcontractors and do not have registration or certificates confirming their profession. In Cambodia, construction sites are project owners. So, the nature of the construction sector is very informal.

ILO estimated that more than 1,500 people were killed by occupational accidents in Cambodia, that is, four people every day. The estimate highlights the serious issue of worker safety in Cambodia, particularly in sectors like construction. These accidents often

result from falls from heights, being struck by falling objects, building collapses, electrocution, suffocation, or exposure to hazardous chemicals.

A key aspect involves the establishment of a coherent legal framework, the strengthening of enforcement mechanisms, and the promotion of workplace safety, with the government demonstrating its commitment through three Occupational Safety and Health (OSH) Master Plans (2009–2013, 2018–2022, and 2023–2027), the latest of which is aligned with the Strategic Development Plan for the Labour, Social Security, and Vocational Training (2024–2028). Cambodia's strategized roadmap for Occupational Safety and Health aims to ensure decent working conditions and establish robust workplace safety management systems in line with national and international standards through the development of comprehensive regulations, strengthened legal framework enforcement, and the promotion of OSH within small enterprises and the informal economy.

Through this survey report, information obtained from workers participating in interviews revealed that the main skills of workers in the cement factory in Kampot province are as follows: (1). Rock drilling skills and truck driving skills, loading rocks onto trucks to be stacked in a grinder (where rocks are broken into small pieces) (2). Skills in blasting rocks for testing, cleaning solar panels, transporting coal, wood chips, and fabric into the heating furnace (3). Expertise in repairing, welding, cutting, and maintaining the market, and then sending it to Lamskun (a place where stones are carefully cut into same size). (4). Expertise in ordering the mixing of stones and clay, then sending it to be ground in the raw materials section (5). Skilled in electrical engineering and (6). Skilled in cutting welding when they are ground into powder, in terms of raw materials, and then sending them to be mixed to burn all kinds of raw materials.



Why is this survey necessary?

Since its establishment in 2009, the Building and Wood Workers Union Federation of Cambodia (BWTUC) has been dedicated to addressing challenges and advancing workers' rights within the sector, despite the country's complex socio-economic conditions and difficult political environment.

Over the years, BWTUC has achieved significant political and strategic successes in improving the working conditions and livelihoods of both local and remote workers through collective bargaining, social dialogue, advocacy, and a range of campaign activities at both national and international levels.

BWTUC has adopted a five-year strategic plan (2023–2027) that focuses on strengthening enterprise-based trade unions. Its strategic priorities include organizing and mobilizing workers, improving working conditions through establishment of Collective Bargaining Agreements (CBAs), contributing to policy reform in the construction sector, and enhancing the capacity of affiliated local trade unions.

Wages continue to be a major challenge for workers in cement companies, particularly among those employed by sub-contractors, where foremen often exploit the labor force by providing low and irregular pay

A gender pay gap continues to exist between men and women in the workplace. Many construction workers—particularly those employed by small contractors operating outside the formal system—earn less than the minimum monthly wage and lack access to social security protections such as health care, work injury coverage, pensions, job classification benefits by profession, and other entitlements. These gaps contribute to labor migration, financial insecurity, and an increased risk of child labor exploitation.

Purpose of the assessment:

- ▶ To assess the worker's needs in cement sector within in Cambodia—particularly in BWTUC's target areas—with regard to labor rights, working conditions, wages, freedom of association, and occupational Safety and health (OSH).
- ▶ To contribute to the promotion and dissemination of labor rights and freedom of association among workers in the cement sector
- ▶ To identify and document the challenges faced workers in cement sector, as well as their recommendations, in order to inform and strengthen the BWTUC's strategic plan.



What methods were used, and who were the participants in the assessment?

3.1 Assessment design and sample

The assessment was conducted through face-to-face interviews with respondents, including union members and workers in the cement sector, across 12 companies located in Kampot Province, Cambodia. The sample population consisted of workers aged 15 to 45 years. Data collection was carried out over a one-month period, from July 1 to July 31, 2025

The assessment employed a random sampling strategy in order to ensure representativeness of the target workers, which included both unionized and non-unionized workers in the cement sector. In total, 179 participants were interviewed, of whom 32% were women, thereby providing gender-inclusive perspectives. The data collection was carried out in Dang Tong and Teuk Chhou districts of Kampot Province, which are key sites of cement production within Cambodia.

Interviews were conducted within community settings, in close proximity to workers' workplaces, as well as in workers' households. A structured questionnaire was administered through face-to-face interviews to ensure clarity and reliability of responses. The data collection process was coordinated and supervised by staff from BWTUC.

3.2 Questionnaire development and data collection

The development of the questionnaires was undertaken by technical officers and subsequently reviewed and refined through discussions with the leadership and staff of the Building and Wood Workers Trade Union Confederation (BWTUC). A technical meeting was convened to provide feedback on both the questionnaire design and the data collection procedures, including the interview process. Following a pilot test of the questionnaires conducted by BWTUC staff, the leadership and working group finalized the data collection plan, which included assigning responsibility for specific target companies and unions to designated teams.

3.3 Data entry and analysis

Data entry is performed directly by staff using the Microsoft Excel database system developed by the technical officers. The system enables automatic analysis of the entered data, while simultaneous quality control checks and verifications are conducted to ensure accuracy and reliability

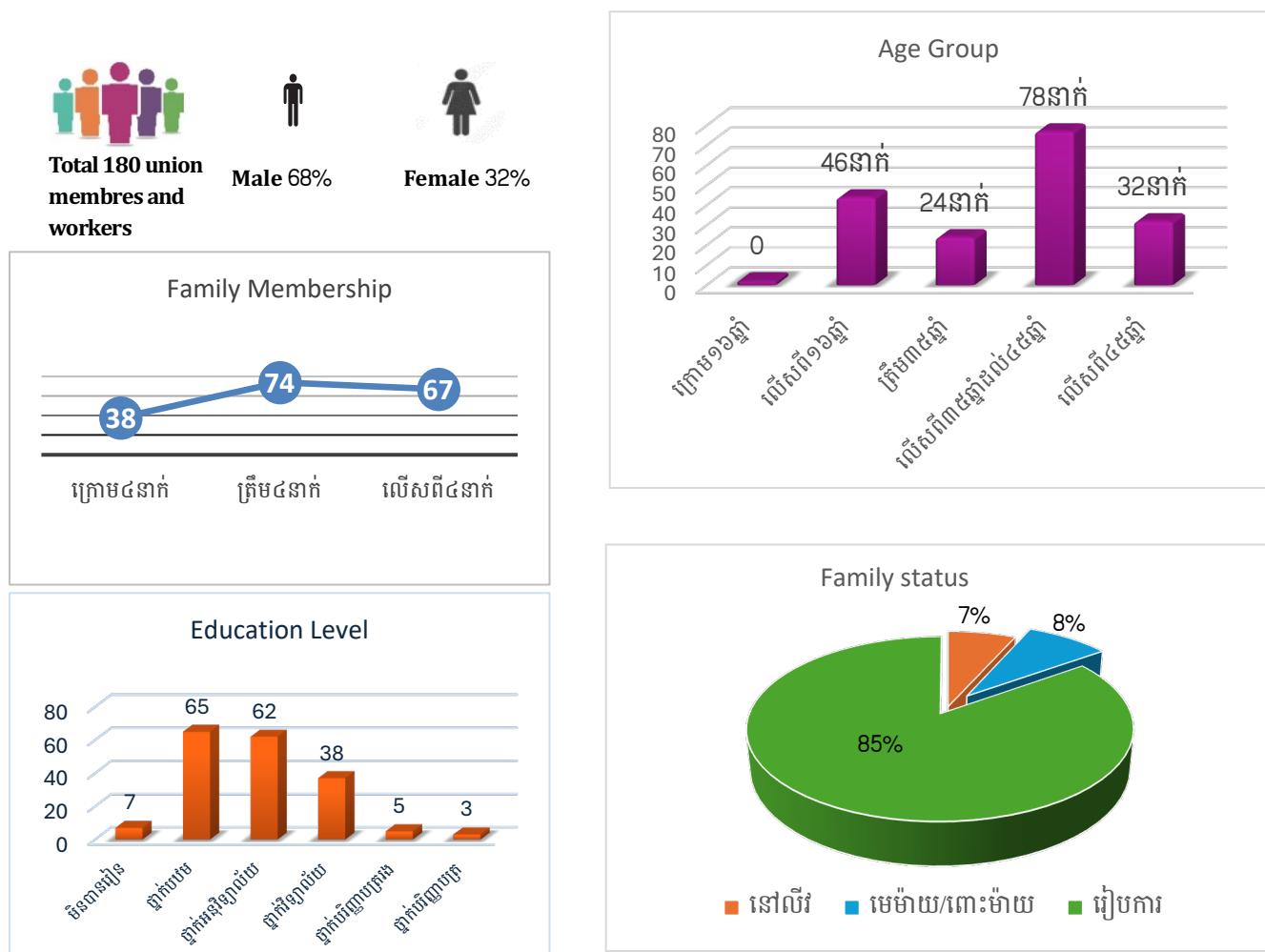




What insights do the assessment findings provide regarding the working conditions of workers in the cement sector?

4.1 General information

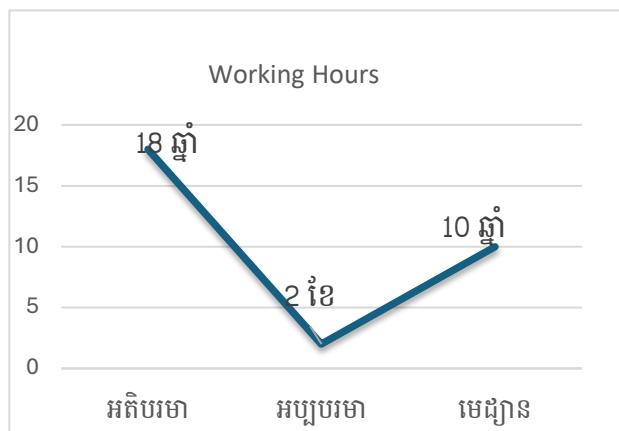
The assessment was conducted with a total of 180 workers in the cement sector, of whom 32 were female. Respondents' ages ranged from 16 years to over 45 years. Regarding educational attainment, the majority (65 workers) had completed only primary school, while a small proportion (3 workers) reported holding a bachelor's degree. Additionally, 7 respondents indicated that they had no formal education. In terms of marital status, the majority of respondents (85 percent) were married.



Graph 1: General information

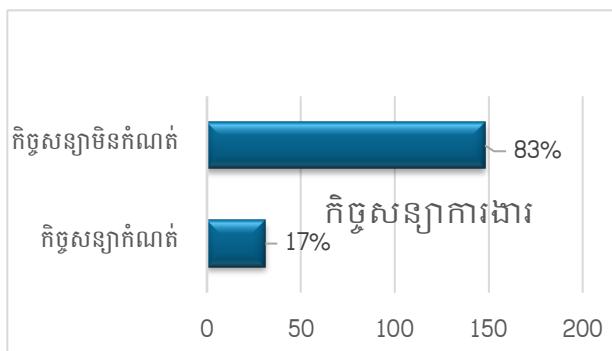
4.2 Wage section

According to the report, 83 percent of respondents have employment relationship under an Undetermined Duration Contract (UDC), while 17 percent were employed under a Fixed Duration Contract (FDC)



Graph 3: Working hours

According to information provided by workers in cement companies, 165 respondents reported receiving their wages through bank accounts or bank statements. Ten workers indicated that they received their wages in cash directly, while five workers did not provide a response regarding their wage payment method



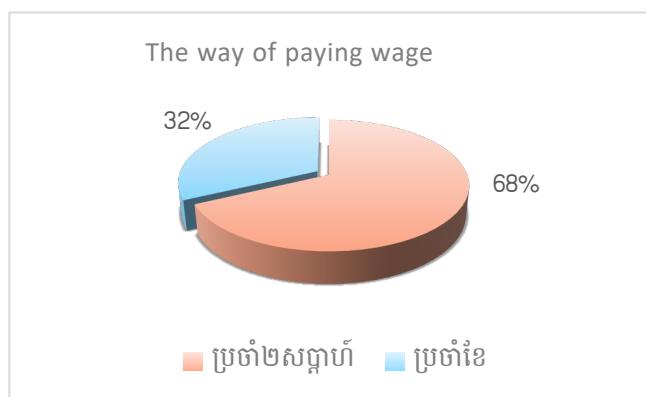
Graph 2: Employment contract

The graph indicates that employment duration among interviewed cement sector workers ranges from as short as two months to as long as 18 years. Notably, the largest proportion of respondents reported a tenure of approximately 10 years.



Graph 4: How to pay wages

According to the assessment report, 68% of interviewed cement company workers indicated that they receive wage payments twice a month (or every two weeks), while 32% reported receiving their wages once a month, typically at the end of the month.



Graph 5: The way of paying wage



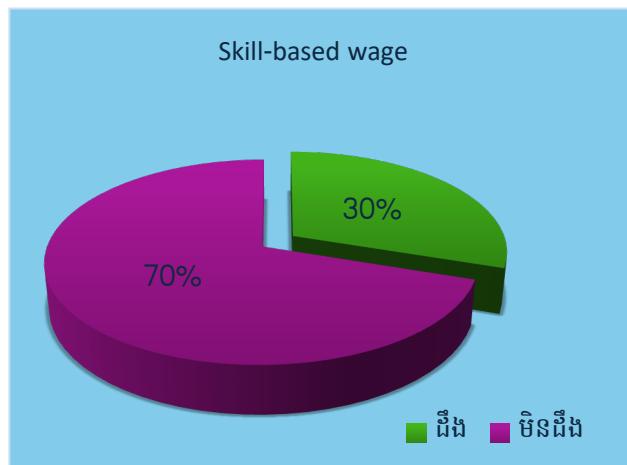
Interview findings show that 127 workers reported receiving monthly wages between USD 201 and USD 250. In addition, 24 workers reported wages above USD 251 per month, while three workers reported the lowest wage range, between USD 50 and USD 100 per month

The graph shows that the highest reported basic wage among the interviewed workers was USD 408 per month, with a corresponding total wage of USD 430. The lowest reported basic wage was USD 128 per month, with a total wage of USD 180. In addition, the maximum reported basic wage was USD 208 per month, with a total wage of USD 280.

Graph 6: Monthly wage

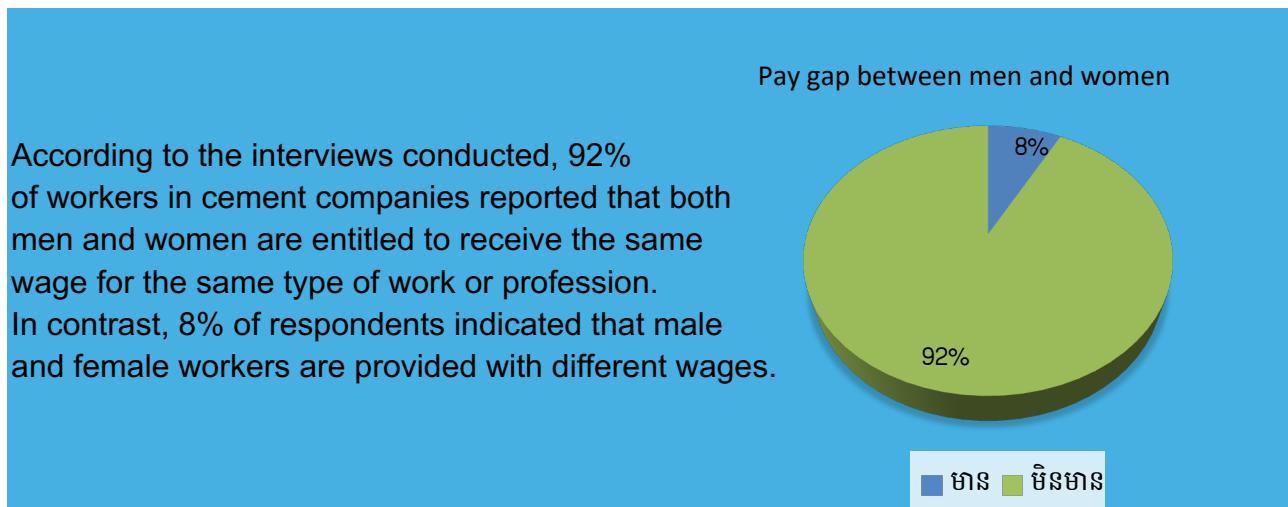


Graph 7: Basic wages and total Wages



According to information from interviewed workers in cement companies, 70% reported that they did not know, or were uncertain, whether their wages were based on skills, while 30% reported that their wages were determined according to skills in the workplace.

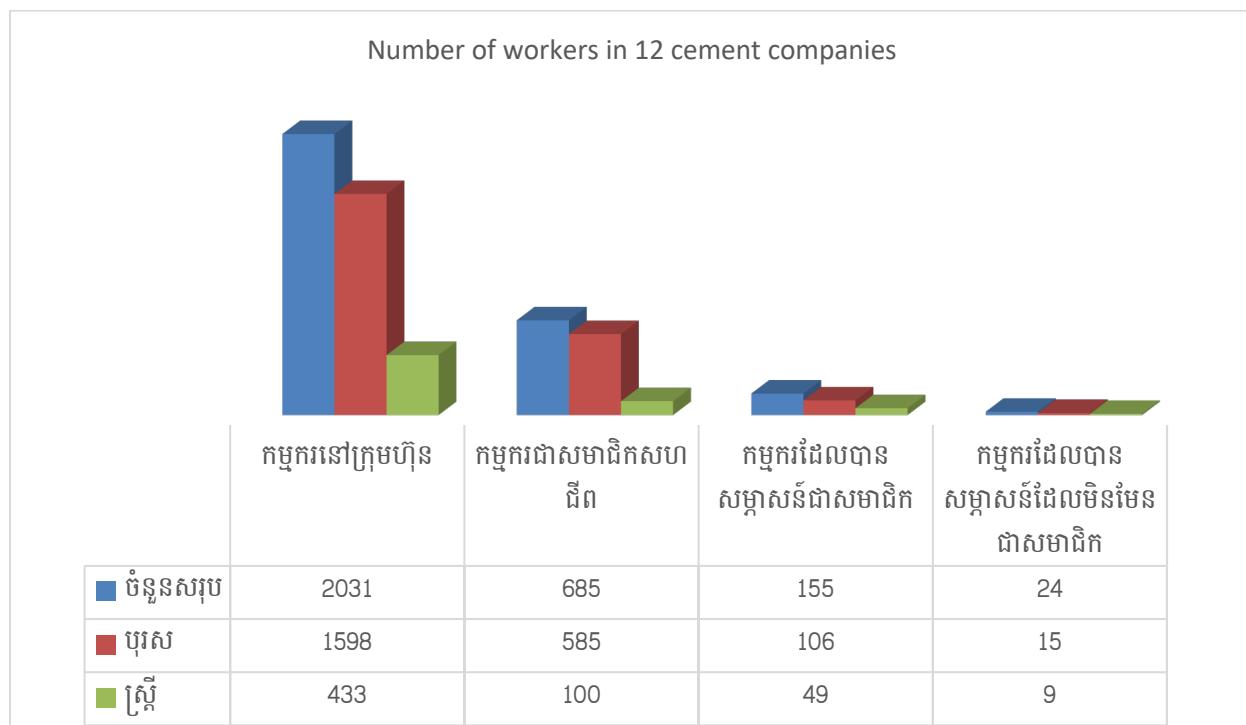
Graph 8: Skill-based wage



Graph 9: Pay gap between men and women

4.3 Freedom of association

The graph illustrates the workforce composition in 12 cement companies with a total of 2,031 workers, of whom 1,598 are men and 433 are women. Among these, 685 workers are union members (584 men and 100 women). For the assessment, a total of 179 workers were interviewed, consisting of 155 union members and 24 non-union members.



Graph 10: Number of workers in 12 cement companies

4.4 Occupational Safety and health (OSH)

Occupational safety and health	Yes	No	Don't Know
Existing OSH committee within the companies	76%	14%	10%
The company provided workers with personal protective equipment (PPE) and issued OSH measure	96%	3%	1%
The company employs an on-site doctor to deliver healthcare services in the event of emergencies	67%	23%	10%
The company provides workers with access to regular health check-up services	70%	22%	8%
The company registered workers for eligibility under the National Social Security Fund (NSSF)	95%	0.6%	4.4%

Table 1: Occupational safety and health

4.5 Perspectives and demands articulated by workers in the cement sector

Challenges in Participating enterprise-based trade union:

- ▶ Companies restrict workers from participating in trade union activities.
- ▶ Employers issue threats against workers who seek to join trade unions
- ▶ Discriminatory practices are directed toward local unions
- ▶ Meetings between trade unions and their members are held irregularly

Below are the action taken in response to workplace accident or incident:

- ▶ Workers report incidents to the company, including team leaders, head of departments, and administrative personnels
- ▶ Workers communicate with trade unions regarding the incident
- ▶ Workers contact emergency medical services as needed
- ▶ Workers liaise with the National Social Security Fund (NSSF) for support or claims

Workers' demands:

- Minimum wage must be commenced within the range of \$208 to \$300 per month
- Ensure regular salary payments with annual increase starting at \$10
- Fringe benefits must be provided as well as performance-based incentives and severance pay

1. Wage

-Commence Collective Bargaining Agreement (CBA) and Most

5

CONCLUSION

- Employers should ensure that qualified doctors are present on-site and that appropriate emergency facilities are accessible
- Employers are requested to arrange health check-ups for all workers at least twice per year
- Employers must ensure that all workers are registered with the NSSF

safety and health

This study underscores the significance of considering the perspectives of workers employed in cement companies who are members of BWTUC. The findings highlight the critical role of active engagement by employers, companies, and the government in promoting labor rights and improving working conditions, in alignment with national labor laws and relevant International Labour Organization (ILO) conventions. Such collaboration ensures the protection of workers' rights and benefits within the cement sector. Regarding remuneration, the study notes notable progress, with wages being disbursed every two weeks or semi-monthly in accordance with the Labor Law, and particularly through the regular and secure transfer of payments to individual workers' bank accounts.

Although minimum wages in this sector have not yet been formally established or discussed at the national level, the survey findings indicate that the base wage negotiated between companies and workers is comparable to that in the garment sector, with a standard rate of \$208 for employees holding valid contracts. Additional benefits, such as overtime compensation, and allowances for food and transportation, are also provided. In terms of occupational Safety and health (OSH), the cement company demonstrates compliance with establishment of OSH guideline and OSH committee at workplace. The company provides clear instructions for the proper use of health and safety equipment, supplies adequate personal protective equipment (PPE), have employed doctor on duty for first aid, and provide workers with support for regular health check-up.

6 RECOMMENDATIONS

Compliance with Labor Laws and Wage Payment Practices in Twelve Cement Factories:

- The assessment revealed that 68% of workers interviewed in cement factories receive wages twice per month (every two weeks), while 32% are paid on a monthly basis made at the end of each month. In Cambodia, the government has established a semi-monthly wage payment system to mitigate financial risks for employees. According to Prakas No. 442 of the Ministry of Labor and Vocational Training, employers are required to disburse 50% of wages in the second week of the month and the remaining 50%, along with all applicable benefits, in the fourth week. This system aims to provide workers with more frequent access to their income, thereby reducing dependence on informal credit and minimizing potential financial hardship.
While the Prakas permits a single monthly payment if mutually agreed upon by employers and employees, evidence indicates that companies, particularly those affected by the COVID-19 pandemic, often face challenges in maintaining timely wage payments. Therefore, it is strongly recommended that the proportion of wages paid in a single monthly installment be minimized. Even when a one-time monthly payment is implemented, employers must provide full disclosure regarding the implications for worker benefits, including those guaranteed under Cambodian labor law in cases of Act of God/force majeure, such as natural disasters or national emergencies. Adhering to these provisions will enhance financial security for workers, ensure transparency in wage practices, and maintain compliance with national labor regulations
- The survey findings indicate that a substantial proportion of workers bear significant family responsibilities. Specifically, 74% of workers support four family members, while 67% support more than four. For households in which the worker is the sole income earner, meeting the needs of these dependents within the limits of current wage levels presents a considerable financial challenge. Given the inadequacy of existing wage income to support workers' families, the following recommendations are proposed: (1). The National Social Security Fund (NSSF) should extend coverage to dependent family members of workers (2). Employers and policymakers should prioritize wage increases to ensure an adequate standard of living and dignified life for workers and their families (3). Collective Bargaining Agreements (CBAs) or other binding agreements should be established to secure additional benefits beyond those mandated by law.

- According to feedback from workers in the cement sector, overtime work is a common practice across all 12 assessed companies. Overtime is typically required on regular working days and, in some cases, during national holidays when companies aim to increase productivity, for instance, by cleaning ovens or production areas. In the machine control sections, operations run continuously for 24 hours before shutdown. Due to a shortage of skilled mechanics, a single worker with mechanical expertise may be required to work extended hours or cover two shifts per day. In situations where workers are absent, informal agreements between colleagues often result in others taking on additional shifts to ensure continuous operation.

The findings further reveal that overtime frequently exceeds two hours per day, which is not in compliance with labor law provisions limiting overtime to a maximum of two (2) hours daily. Despite this legal violation, workers expressed general satisfaction with the opportunity to work overtime and with the benefits provided as compensation.

However, the prevalence of excessive overtime raises critical concerns. Prolonged working hours can adversely affect both the physical and psychological health of workers. Female workers, in particular, face disproportionate risks, as excessive or forced overtime may compromise reproductive health and heighten exposure to safety concerns, especially when traveling at night. It is therefore essential that stakeholders ensure overtime practices are effectively regulated to protect the health, safety, and overall well-being of workers.

Freedom of Association

- Cambodia's Trade Union Law (2016) was enacted with the objective of guaranteeing the rights and freedoms of workers, establishments, and individuals under its scope. It specifically regulates the organization and functioning of professional organizations of workers, employees, and employers within the Kingdom of Cambodia. In practice, most of the 12 assessed cement companies have established trade unions to represent workers. This demonstrates the exercise of the right to organize as professional associations and ensures worker representation within Occupational Safety and Health (OSH) committees at the workplace—an important and positive development. Nevertheless, some interviewed workers reported experiencing threats, harassment, and persecution when participating in union activities or serving as union activists. Such practices undermine the principles of freedom of association guaranteed by law.

To safeguard workers' rights in the workplace, it is recommended that awareness of the right to freedom of association be systematically promoted among both workers and employers. At the same time, companies should foster an enabling environment for social dialogue and work to strengthen cooperative relationships

between unions and employers in order to achieve outcomes that are mutually beneficial.

- Across the 12 assessed factories, there are a total of 2,031 workers, of whom only 685 are union members, according to BWTUC data. This relatively low rate of union membership suggests that the capacity and power of unions to engage in dialogue or to advocate effectively with employers and the government remains limited. To enhance their influence, unions should strengthen strategies for organizing and mobilizing more workers. Expanding membership would enable unions to build a stronger collective force capable of advancing workers' common interests, both within individual companies and across the cement sector nationally. Such efforts of trade unions are also essential to ensuring compliance with Occupational Safety and Health (OSH) standards, the protection of Freedom of Association (FoA), and other fundamental labor rights in the workplace.

Occupation Safety and Health (OSH)

- Among the workers interviewed, all were registered with the National Social Security Fund (NSSF) and entitled to benefits under Cambodian law, including coverage for occupational risks, healthcare, and pensions. While these provisions are important, it is widely recognized that prevention is preferable to treatment. In the absence of adequate Occupational Safety and Health (OSH) protection, workplace accidents or fatalities result in significant personal and financial losses for workers and their families, as well as economic losses for companies due to reduced productivity and increased costs.

Given that the cement sector is characterized by high occupational risks, it is recommended that the state enact and rigorously enforce comprehensive OSH legislation. Furthermore, existing labor unions should be strengthened to play a more active role in promoting workplace safety. Specifically, workers' organizations should be empowered to participate as representatives in workplace OSH committees or working groups at the national, regional, and international levels, facilitating the exchange of knowledge, best practices, and collaborative strategies for improving occupational health and safety standards.

General Recommendations

Come to a general recommendation under observation in the assessment, Cambodia's social security system, funded through employer contributions, provides support to workers in the event of workplace accidents via the Social Security Fund. While this mechanism offers partial protection, prevention remains the most effective approach. Workplace accidents frequently result from negligence or inadequate implementation of Occupational Safety and Health (OSH) measures, highlighting gaps in the quality and

effectiveness of current protection systems. Establishing OSH as a robust prevention mechanism should therefore be a top priority to minimize workplace hazards. By emphasizing preventive measures, workers, employers, and government authorities can reduce unnecessary financial losses, improve workplace safety, and enhance overall productivity.

The development of a strong and effective OSH system requires active participation from workers' and employers' unions, as well as government engagement. Strengthening workplace safety and health systems involves additional efforts, including expanding industrial relation both bipartite and tripartite social dialogue. Specifically, the government should accelerate the enactment and practical implementation of OSH legislation and create an enabling environment for regular bi- and tripartite dialogue within the cement sector. Such initiatives will foster continuous communication among stakeholders, support the exchange of best practices, and ensure the effective enforcement of occupational safety and health standards.

7. REFERENCES

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- Safety and health in the textile, clothing, leather and footwear sectors www.ilo.org/sites/default/files/wcmsp5/groups/public/@ed_dialogue/@sector/documents/normativeinstrument/wcms_866154.pdf
- Guidelines for organizing infirmaries for enterprises and institutions https://mlvt.gov.kh/media/k2/attachments/CambodiaZInfirmaryZGuidelines_KhZV2.pdf
- Study report on heat and body work Heat and the working body by Mr. Pratik Mishara and Dr. Laurie Passons
- Survey report on construction workers in Phnom Penh 2017 by the Center for Policy Studies

8. ANNEXS

List of companies and target groups participating in the survey

No	Full Name	Location	Parent Company	Acronym	Total Worker
1	Thai Boon Roong Cement Co.,Ltd (Parent Company)	Kampot Province, Dang Tong district,	Thai Boon Roong	BWTU-T.B.R.C	296
2	TS cement company (New Name/T Service Technical Kampot Co.,Ltd			BWTU-T.S.T.K	30
3	Charkrey Ting Cement Factory (Parent company)	Kampot Province, Teuk Chhu district	Charkrey Ting Cement Factory	BWTU-CCC	380
4	Bag Packing Company (Chakrey Ting)			BWTU-B.P	118
5	S&B Cement company (New Name/Phnom Pech Kampot (under K-Cement)	Kampot Province, Dang Tong distric	K-Cement Factory	BWTU-P.P.K	390
6	Kron cement company (New Nam /Janran M.E Service Co.,Ltd (under K-Cement)	Kampot Province, Dang Tong distric		BWTU-J.M.E	95
7	Bun cham Roeun cement company (New Name/Beiv Thi Char Co.,LTD (under K-Cement)	Kampot Province, Dang Tong distric		BWTU-BTC	368
8	UTH THY cement company (New Name/LCHHL Co.,Ltd (under K-Cement)	Kampot Province, Dang Tong distric		BWTU-LCHHL	143
9	THAN DA CLEAN SERVICE (New Name/TD Cleaner Co.,Ltd (under K-Cement)	Kampot Province, Dang Tong distric		BWTU-TD	29
10	TS Myler Sales & Service Co.,Ltd (under K-cement)	Kampot Province, Dang Tong distric		BWTU-TSS	103
11	Building and Wood Workers Trade Union of Faith company(New Name/ Zeal Eng Co.,Ltd (under K-cement)	Kampot Province, Dang Tong distric		BWTU- Z.E	59
12	ETPS (under K-cement)	Kampot ProvinceDang Tong distric		BWTUC-ETPS	20