Food Regulations in the Middle East: A Mars Perspective

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Agenda

• Few words about Mars Inc.
• What’s going well
• How the system works?
• Current Challenges
• Recommendation
We are the world’s leading confectionery company

a leading chocolate manufacturer,

in 2008 we acquired Wrigley.
We are also the leading petcare company
Our Presence in GCC
The Five Principles of Mars

Quality  Responsibility  Mutuality  Efficiency  Freedom
Why do we need Food Regulations?

• To protect consumers from:
  • Unsafe practices
  • Misleading information

• Ease cross boundary trade

This requires joint effort between Regulators, Industry and Academics
What is going well?

• **Formation of:**
  - GCC food safety committee
  - SFDA (Saudi Food & Drug Administration)
  - Food Safety committee in Egypt (in progress)

• **Positive signs towards alignment with Codex & ISO**
  - SASO role model
  - Should be implemented across the region
  - >16700 standards published
What is going well?

• Commitment towards standardization and harmonization across boundaries
  • GSO Model
  • 6 GCC + Yemen

• Industry involvement in standards
  • Dubai Municipality role model
  • Transparency & Collaboration

• Huge focus on Food Safety
Elements of Food Regulations

- Include:
  - Food Standards
  - Food Labeling
  - Food Safety & Hygiene standards
  - Food Additives
  - Pesticides/ Contaminants
  - Inspection/ Certification
  - Risk Assessment
Current Challenges

- Lengthy & complex approval process for standards
  - Standards required to be updated
- Lack of fully harmonized standards & requirements across the Middle East
- Need for more alignment between multiple agencies
  - Ministries, authorities
  - Legislate, implement, control
  - Cascading and adoption of standards
- Communication to industry
  - Local decrees
- No trade associations to represent industry
How the Regulatory system works?

GCC food & Agriculture Committee
Submit requests to GSO Annual Plan

GSO Technical Committee
review and finalize Annual plan

GCC food & Agriculture Committee
Members draft/ amend standards

GSO Technical Committee
approve/ send final
draft to Multiple agencies

Multiple Agencies Review

GSO Technical Committee review/
approve/ issue draft std

Ministries Approval

Multiple agencies for implementation
Who to go to and when?

GCC Food Safety Committee

ESMA

GSO

Local Ministries

Local Municipalities

GCC Food & Agriculture Committee

SFDA

SASO

Other GCC multiple agencies

Over 30 agencies

+18 month
Lengthy Approvals

• Standards still in draft
  • GSO Chocolate Standards
  • GMO standard

• Out of date
  • Morocco chocolate standards have finally been approved
  • Has not changed since 1932
  • The Chocolate Standard stipulates that Milk chocolate must contain:
    • cocoa solids minimum 32%
    • milk solids minimum 15%.
  • Several attempts to adopt Codex by major Chocolate players
  • GMA, NCA
When products is exported to GCC, why do we need:

- Health certificate

Qatar:
- Requires Irradiation free certificate for food products from Europe, Turkey and UAE

Saudi:
- Requires Dioxin free certificate

Sampling and Testing
• Labeling requirements vary across the Middle East
• Products overly crowded with text to ensure it is Saleable across a wide range of countries
• Use of Production date, product type, product category, etc
• Nutrition information not mandatory
• Allergen labeling not mandatory
### Food Colors

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Other Gaps

- GMO
- Functional Food
- Allergens
- Traceability
- Recall
MARS  Why Codex?

- Consistently reviewed
- Agreed upon by the international scientific community
- Deemed as viable and appropriate standard for the food manufacturers to follow
- Global standard for those countries who don’t have their own legislation
- Recognized as a global standard by WTO

Discrepancies will unduly create trade barriers and potentially affect the flow of food products across borders
MARS | Recommendation

- Food legislation and standards aligned with Codex across the Middle East
  - AIDMO
- Harmonization across the Middle East
- More early involvement from industry
- Faster approvals and implementation
- Recognition of documentation across the GCC & Middle East
  - Recognition of SASO, ESMA mark etc…
- More Mandatory information to consumers:
  - Nutrition information like GDA should be mandatory
  - Use Best Before Date
  - Allergens
And Finally.....

- Let’s get the facts
- Science based evidence
- Collaboration
- The Consumer
Thank you
Mars Inc

6 business segments:

- Chocolate
- Petcare
- Food
- Wrigley
- Drinks
- SymbioScience
Africa, India and Middle East

57 Countries
Example: Vegetable Fat

• Addition of Vegetable fat to chocolate is permitted in our Region Provided it does not exceed 5%
• But.......................Labeling varies
  • chocolates made with substitutes of cocoa butter
  • the names of the cocoa butter substitutes and/or vegetable oils should be mentioned
  • “contains vegetable oils in addition to cocoa butter”
• GCC Chocolate Standards still in draft

• Not fully aligned with Codex
  • Minimums for **total fat and sugars**: not a requirement in Codex
  • **Fat free milk solids** defined: Codex defines milk fat and total milk solids requirement
  • The use of certain **Emulsifiers** (except lecithin) is restricted to a certain dosage: Codex: Permit broader use of emulsifiers across various chocolate products
  • **Antioxidants** not allowed in white chocolate
• Morocco chocolate standards have finally been approved
• Has not changed since 1932
• The Chocolate Standard stipulates that Milk chocolate must contain:
  • cocoa solids minimum 32%
  • milk solids minimum 15%
• Several attempts to adopt Codex by major Chocolate players
• CMA, NCA