Food Regulations in the Middle East: A Mars Perspective

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MARS | Agenda

- Few words about Mars Inc.
- What's going well
- How the system works?
- Current Challenges
- Recommendation

MARS We are the world's leading confectionery company

a leading chocolate manufacturer,















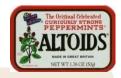
in 2008 we acquired Wrigley.













MARS | We are also the leading petcare company



















MARS Our Presence in GCC

















MARS The Five Principles of Mars



MARS | 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

MARS 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



MARS 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

MARS Elements of Food Regulations

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





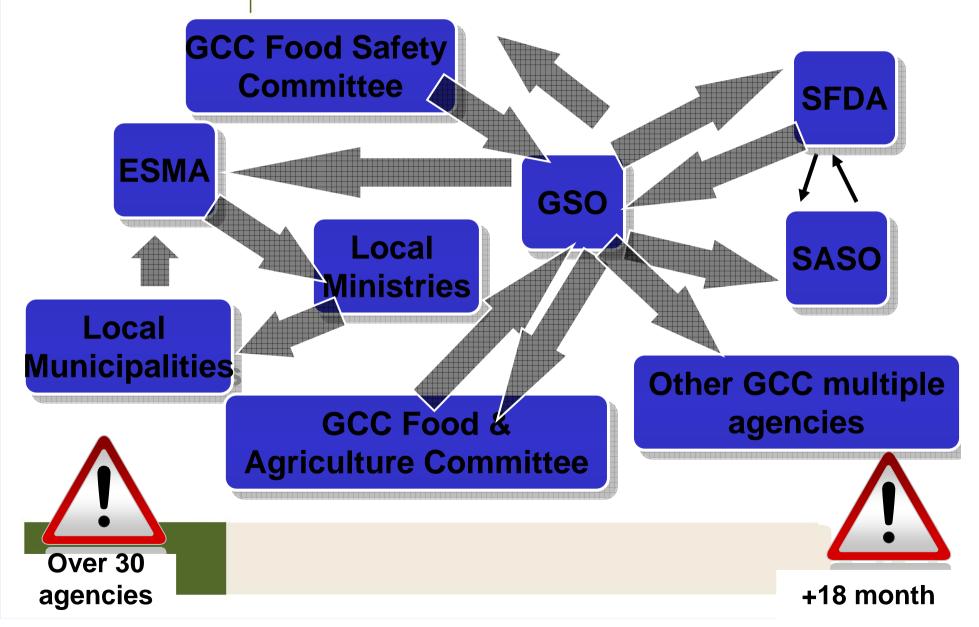
- Lengthy & complex approval process for standards
 - Standards required to be updated
- Lack of fully harmonized standards & requirements across the Middle East
- Need for more alignment between multiple agencies
 - Ministries, authorities
 - Legislate, implement, control
 - Cascading and adoption of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

How the Regulatory system MARS 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

MARS Who to go to and when?





MARS 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**

MARS Certification

- 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

MARS Food Labeling

- 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

MARS | Harmonization Gaps

Food Colors

	GCC	Egypt	Lebanon	Syria	Tunisia	Algeria
E100		33				
E101						
E102						
E104						
E110						
E120						
E122						
E123						
E124						
E127						
E128						
E129						
E131						
E132						
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E142						
E143						
E150a						
E151						
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E155						
E160a						
E161						
E162						
E163						
E164						
E170						
E171						
E172						
E173						
E174						
E175						
E180						

MARS 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

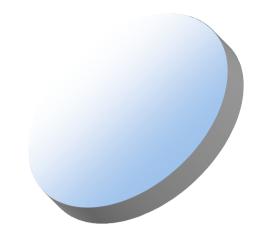
Discrepancies will.....

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

MARS And Finally.....

- Let's get the facts
- Science based evidence
- Collaboration
- The Consumer







6 business segments:

- Chocolate
- Petcare
- Food
- Wrigley
- Drinks
- SymbioScience



























































MARS | Africa, India and Middle East



MARS 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

MARS Lengthy Approvals

- GCC Chocolate Standards still in draft
- Not fully aligned with Codex
 - Minimums for total fat and sugars: not a requirement in Codex
 - <u>Fat free milk solids</u> defined: Codex defines milk fat and total milk solids requirement
 - The use of certain <u>Emulsifiers</u> (except lecithin) is restricted to a certain dosage: Codex: Permit broader use of emulsifiers across various chocolate products
 - Antioxidants not allowed in white chocolate

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