

The background features a large, light beige, stylized logo of the word 'MARS'. The letters are thick and blocky, with rounded corners and a slight shadow effect. The word 'MARS' is centered horizontally and vertically on the page.

MARS

Implementing the VITAL tool - a case study

11/9/08

MARS

Mars Snackfood

- **Brands manufactured - MARS®, SNICKERS®, MILKY WAY®, MALTESERS®, PODS®, DOVE®, M&MS®, SKITTLES®, TWIX®, FLING®, BOUNTY®**
- **Complex site -**
 - 8 different Processes,
 - 6 common Wrapping areas
- **6 allergens highlighted in the Code in the 'Table to Clause 4' are used as ingredients onsite (milk, egg, peanuts, soy, tree nuts, cereals)**



- **Guidelines from 3 documents used to develop site Allergen Strategy & Program;**

- Food Standards Code
- Mars Global Allergen Standard
- AFGC Allergen Guide

**Australia
New Zealand
Food
Standards
Code**

Incorporating amendments
up to and including
Amendment 100

Mars Incorporated
Good Manufacturing Practices
Requirements for Allergen Management
in Human Foodstuffs
FINAL - Version 1
April 2008



What we had was...

- **Detailed guidelines**
- **Various methods for assessing cross contamination risk**
- **A Sampling/Testing program**
- **and perhaps an overuse of advisory labelling**

MARS

What we needed was...

**A standardised Allergen risk
assessment procedure to define our
labelling policy**

A potential answer was...

VITAL

MARS

Initial thoughts upon seeing the VITAL Tool list of modules...



After the initial shock...

- **Downloaded Tool and associated information from Allergen Bureau website**
 - Read through the provided guidelines
 - Worked through the 'Soup Mix' example
 - Trained one of our own products
 - Started to become familiar with of all the different sections

And then it was off to...

- **External VITAL Tool training**

- Half day session in Melbourne ran by 'Advancing Food Safety'
- Re-iterate principles behind VITAL Tool
- Understand VITAL Procedure and its application
- Real life opportunity to use tool with expert guidance

And then of course it was time to start implementation...

•Obtained information required to use tool

- Product ingredient lists
- PIFs
- Production schedules
- Particulate vs Readily Dispersible Form
- Process information (residual amounts, Batch amounts etc)

Challenges/Issues - During initial Implementation stage

- Specific HACCP & VITAL tool training required
- Time & resources
- Building competency in use of the Tool
- Only 20 lines for Ingredients on tool
- Getting accurate information from Suppliers - PIF's, changes to their Plant/Process
- Comprehensive knowledge of Plant & Processes is required
- Requires some 'Assumptions' (residual amounts etc), particularly for continuous lines

What we have ended up with is...

- A systematic process to determine Allergen risk from cross contamination
- A way for data to be used to validate the risk assessment and ongoing verification

GRAND TOTAL - RM & Processing Cross Contact, & Concentration / Dilution Impact (As Consumed)	Units	Milk	Egg	Soy	Fish	Peanut	Tree Nut	Sesame	Crustacea	Gluten
	ppm	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	Labelling	Must label	No Label	Must label	No Label	No Label	No Label	No Label	No Label	Must label

Action level 1 (ppm)		5	2	10	20	2	2	2	2	20
Action level 3 (ppm)		50	20	100	200	20	20	20	20	100



Where are we up to?

MALTESERS® CONTAINS 75% MILK CHOCOLATE AND 7.5% MALT EXTRACT. INGREDIENTS: SUGAR, MILK SOLIDS, COCOA BUTTER, COCOA MASS, GLUCOSE SYRUP (SOURCES INCLUDE WHEAT), BARLEY MALT EXTRACT, VEGETABLE FAT, EMULSIFIER (SOY LECITHIN), WHEAT GLUTEN, RAISING AGENTS (500, 501), SALT, PECTIN, FLAVOUR. MILK CHOCOLATE CONTAINS A MINIMUM OF 25% COCOA SOLIDS AND 22% MILK SOLIDS. MAY CONTAIN PEANUTS.

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A TWIX® BAR CONTAINS MILK CHOCOLATE 37%, BISCUIT 32%, AND CARAMEL 31%. INGREDIENTS: SUGAR, MILK SOLIDS, WHEAT FLOUR, GLUCOSE SYRUP (SOURCES INCLUDE WHEAT), VEGETABLE FAT, COCOA BUTTER, COCOA MASS, GLUCOSE, EMULSIFIER (SOY LECITHIN), COCOA POWDER, SALT, RAISING AGENT (SODIUM BICARBONATE), FLAVOUR. MILK CHOCOLATE CONTAINS A MINIMUM OF 25% COCOA SOLIDS AND 22% MILK SOLIDS. MAY CONTAIN EGG PRODUCTS.

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A MARS® BAR CONTAINS MILK CHOCOLATE 40%, NOUGAT 33% AND CARAMEL 27%. INGREDIENTS: SUGAR, WHEAT GLUCOSE SYRUP, MILK SOLIDS, VEGETABLE FAT, COCOA BUTTER, COCOA MASS, BARLEY MALT EXTRACT, COCOA POWDER, EMULSIFIER (SOY LECITHIN), SALT, EGG WHITE, FLAVOUR. MILK CHOCOLATE CONTAINS A MINIMUM OF 25% COCOA SOLIDS AND 22% MILK SOLIDS. MAY CONTAIN PEANUTS AND TREENUTS.

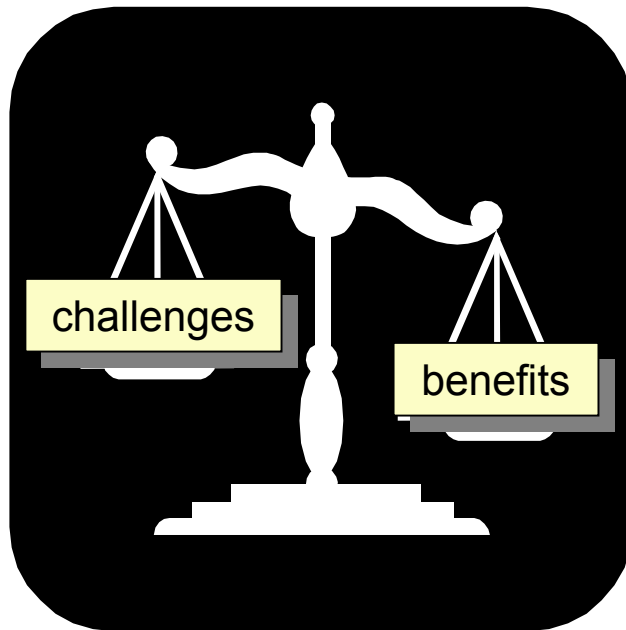
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- Ensures that we know our Raw Material allergen status
- Highlights where an overuse of advisory labelling has occurred
- VITAL is a comprehensive risk assessment tool that is documented and able to be audited
- Allows a consistent advisory language for consumers
- Ongoing verification data is updated easily
- Automatic calculations
- Using the allergen expertise that supports the VITAL Tool we feel our risk assessments will better protect consumers
- Free to download & use



Challenges - Ongoing

- **Data Hungry - and needs to be current**
 - Keeping supplier risks current
 - Updating risks associated with Plant changes
- **Limited space on wraps**
- **Requires all manufacturers to utilise the common language**
- **One size fits all - Grid doesn't take into consideration hyper-sensitive**



We believe we;

- **Have an effective formal allergen risk assessment**
- **Are using the best knowledge available**
- **Have maximised our consumer base**