



FOCUS FORWARD



APEC MEETING

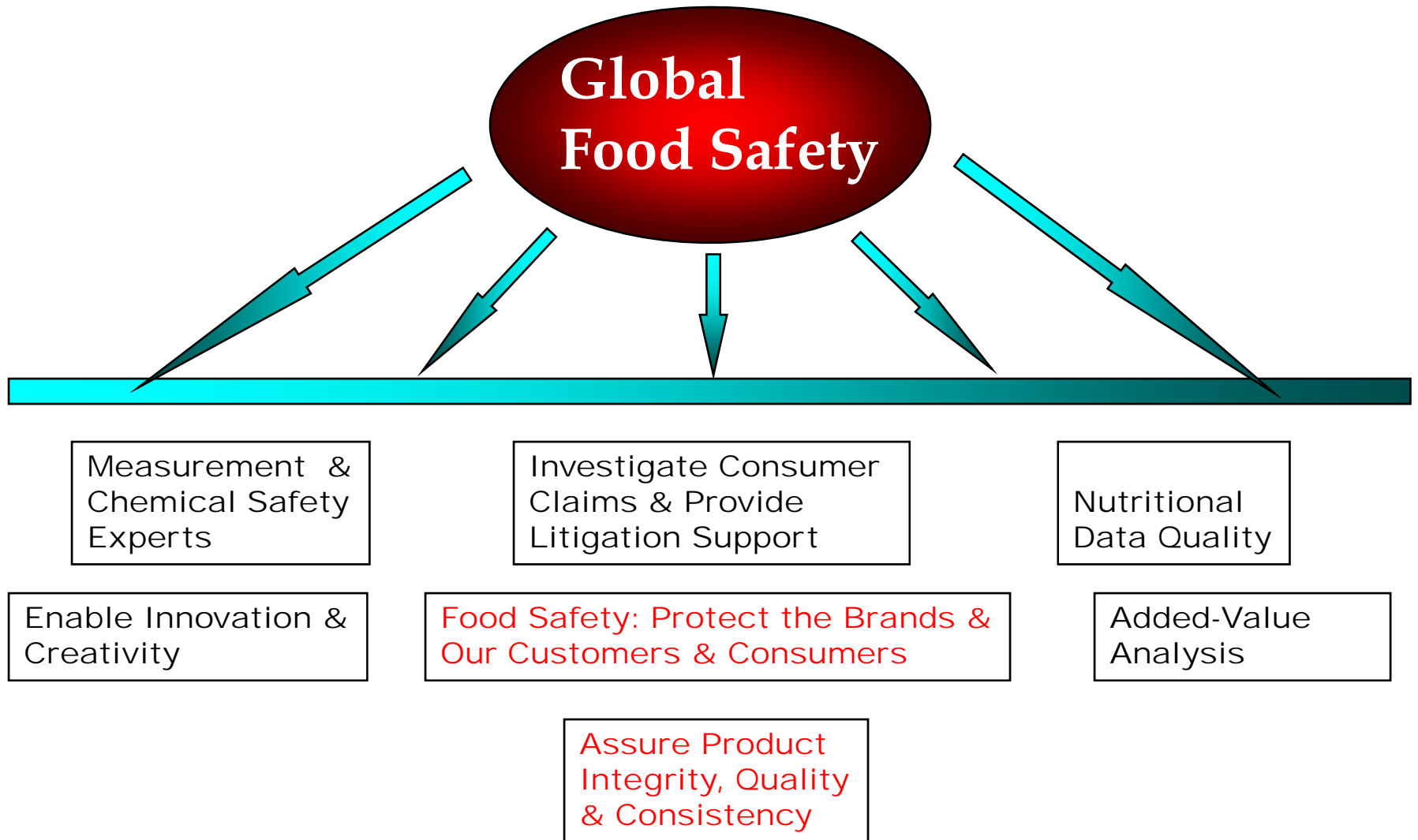
APRIL 25, 2012



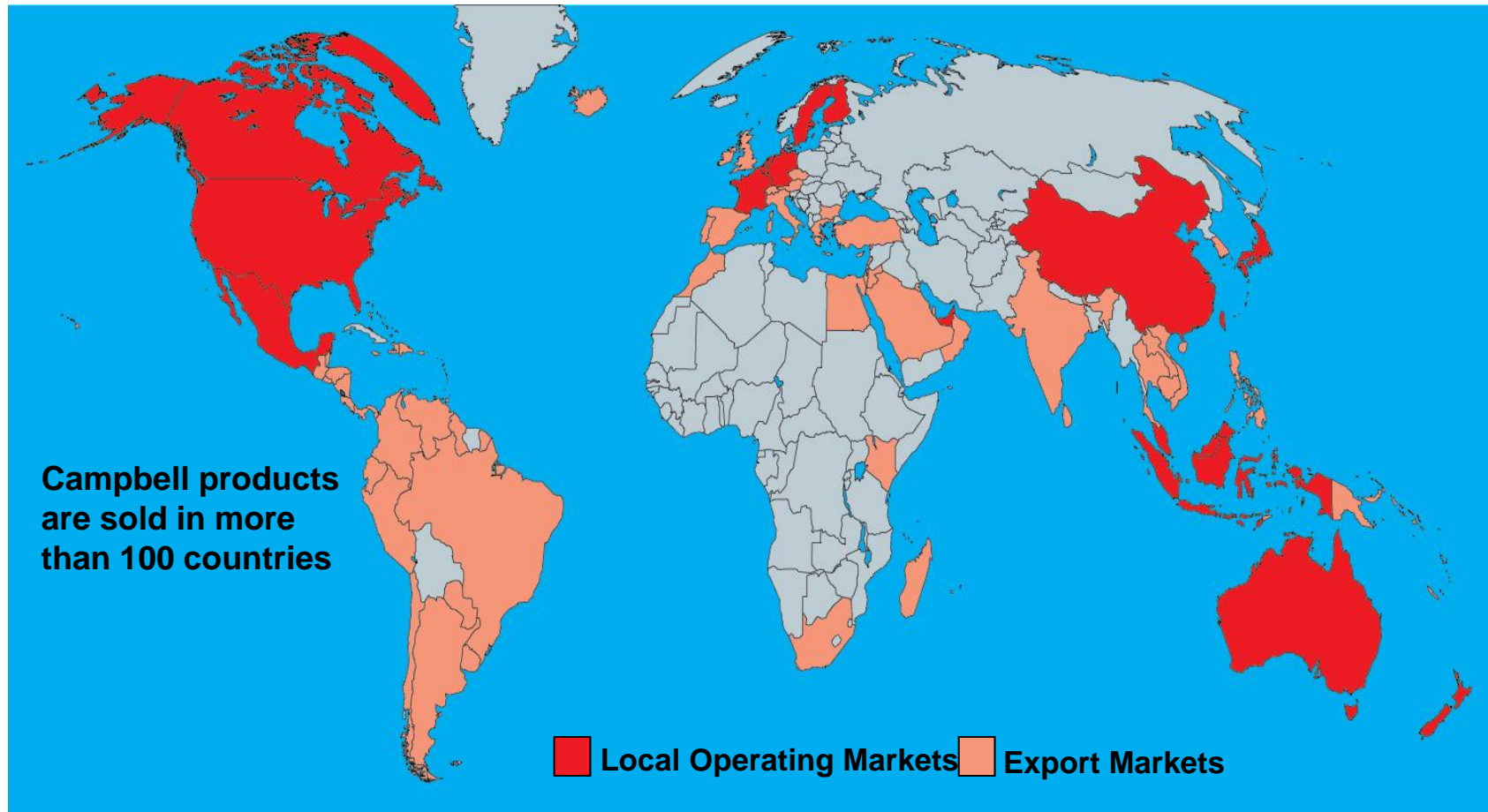
WHEN IS COMMERCIAL CERTIFICATION THE BEST OPTION?

George M. Muscat
Senior Manager Regulatory
Affairs
Campbell Soup Company

ROLES AND RESPONSIBILITIES



GLOBAL FOOTPRINT





- **Global Food and Beverage Manufacturer**
 - Simple Meals, heavily anchored in Soup
 - Baked Snacks, heavily anchored in Biscuits and Bakery
 - Healthy Beverages, heavily anchored in Vegetable-Based Beverages
- **More than \$7.7 billion in sales**
- **Approximately 17,000 employees**
- **142-year history**
- **Products marketed in 100+ countries**



Campbell Portfolio



COMMERCIAL CERTIFICATION DEFINED

**ANY DOCUMENTATION
PROVIDED BY THE
MANUFACTURING COMPANY**



ISSUES AND EXAMPLES

ISSUES	EXAMPLES
Requests are infringing on proprietary formulas.	Exact ingredient percentages and detailed process flows.
Per shipment / Per Lot requests	Certificate of Origin / Certificate of Analysis
GMO / Irradiation	U.S. allows the use of GMO's, allows irradiation for certain processes (spices). Review every ingredient and Vendor.
Lack of knowledge of documentation requirements to import product. .	Product is at the port and is being held by Authorities.



EXPORT DOCUMENTATION REQUESTS F'11 – F'12

	# of Requests
F' 11	
January	0
February	9
March	9
April	8
May	27
June	23
	76
F' 12	
July	35
August	45
September	25
October	14
November	18
December	39
January	41
	217



CERTIFICATE REQUESTS

	APEC Countries	All Other Countries	Total
Cert of Origin	9	237	246
GMO	5	0	5
Ingredient Statement	3	28	31
Allergen	1	0	1
Process Flowchart	2	28	30
Certificate of Sterility	3	28	31
Technical Data Sheet	16	14	30
Certificate of Analysis	0	79	79
Certificate of Health	7	0	7
Broth Declaration	16	0	16
Certificate of H&FS	9	7	16
Plant Address Conf	1	0	1
Irradiation	4	0	4
Nutrition Analysis	0	0	0
"Natural Flavors"	0	0	0
Cert of Wholesomeness	0	12	12
Caramel Color	0	1	1
Flavorings	0	1	1
Product Shelf Life/Storage	1	4	5
Meat USDA Inspection	0	1	1
Packaging Specifications	0	1	1
Dioxine	0	0	0
Antioxidant Statement	2	0	2
Function of Ing.	1	0	1
Authorization Letter	1	0	1
Certificate of Conformance	3	0	3
Case Content	19	0	19
Artwork Label	2	27	29
Formulas (internal)	2	0	2
Kosher Certs	0	1	1
DEHP Statement	1	0	1
SQF (Safe Quality Food) Cert	0	2	2
Salt % and Iodized or Non	0	12	12
TOTAL	108	483	591



RECOMMENDATIONS

- **Provide adequate time to gather information and documentation.**
- **Be consistent in information that is requested.**
- **Blanket certificate versus “lot by lot” or “shipment by shipment”.**
- **Eliminate statements that we are regulated by FDA or USDA. In the U.S. we are regulated by the Agencies.**
- **Rely on information from Technical Data sheet (ing. composition, nutrition, etc...)**

