



Response to the Green Paper “Promoting healthy diets and physical activity: a European dimension for the prevention of overweight, obesity and chronic diseases”

Introduction

Amway is a brand that transcends borders and differences in language, culture, and politics. Operating in 80 countries with more than 3 million direct sellers to distribute its products, the company is part of the Alticor Group whose global sales totaled \$6.4 billion in the FY ended on August 2005.

Unlike other direct selling companies that use outside contractors to develop and manufacture most, if not all, of their products, Amway has invested heavily in extensive R&D and manufacturing facilities for its product lines. The company currently owns more than 500 patents and employs 575 professionals in 67 labs worldwide.

Amway, with our core NUTRILITE™ brand business in nutrition and wellness products, firmly believes in the contribution in raising awareness on the importance of healthy diets and physical activity among our millions of customers around the world. It is thus a strong and passionate promoter of the “Four Pillars” of a healthy lifestyle: Choice, Nutrition, Body and Mind.

Amway is a responsible player in the food supplements’ industry. It is an active member of Food Supplement Associations both at national and European level, as well as a member of the European Responsible Nutrition Alliance (ERNA).

Amway therefore supports the European Commission’s publication of the Green Paper as a stimulus for the debate and exchange of good practice between all stakeholders.

Obesity and other chronic conditions are a major concern for both citizens and governments. Amway shares these concerns and has already set up a number of company initiatives designed to help both employees and customers meet their healthy lifestyle goals. These initiatives will be showcased when answering the questions posed by the European Commission.

Amway has chosen to concentrate on answering those questions of most relevance to its business and where it can provide added-value.



V.2 Consumer education

How can consumers best be enabled to make informed choices and take effective action? What contributions can public-private partnerships make toward consumer education? In the field of nutrition and physical activity, which should be the key messages to give consumers, how and by whom should they be delivered?

Consumer education combined with clear information campaigns can empower consumers to make informed choices and develop a personalized approach to balanced lifestyles.

The multi-faceted nature of the challenge faced ensures that there is a role for a range of actors in facilitating this. Governments and education authorities have a duty to provide education on how to achieve a healthy lifestyle from an early age.

Businesses like Amway, with large pan-European consumer bases and marketing reach, also have a role to play in providing accessible information on diet and physical activity requirements that make understanding and decision-making easier. Through its direct selling channel of distribution, Amway can provide information to thousands of consumers across Europe as they are personally contacted and serviced by our direct sellers when they are presented our product offering.

There is clearly a role for public-private partnerships as companies, governments and NGOs have different and often complimentary skills that can ensure that high quality factual information reaches consumers in a coherent and easily understandable format.

Public authorities, business and NGOs all have a role to play in delivering core healthy lifestyle messages on nutrition and physical activity. Whilst it may be more appropriate for public authorities to be involved in education, business can, through marketing channels such as direct selling, reach a larger cross-section of society in an informative and effective way.

Core messages should be evidence based and scientifically proven, taking into account latest developments and understanding. The enhancement of those core messages could be done by the European Food Safety Authority, should its capabilities be adequately developed. This process however must not ignore the research and development (R&D) capabilities and knowledge of companies in this area.

Amway has, over the last 70 years through an internal R&D program developed its core messages to create awareness on what we consider the key elements for a healthy living and to promote the healthy lifestyle messages:

- **Choice**



Individuals need to take the responsibility to choose what they eat, how they exercise and what measures they need to take to achieve a healthy, balanced lifestyle. It is important they can make properly informed choices based on appropriate and proper resources, based on clear and scientifically sound information.

- **Nutrition**

A balanced diet is at the centre of the healthy living equation. Eating regular meals with plenty of fruit and vegetable can provide all nutrients needed to support health. However our modern living environments, life events such as pregnancy, occupations and activities may increase the gap between what we eat and the nutrients the body needs. Therefore in some cases we believe that supplementation with nutrients can be a practical and safe way to ensure an optimal supply of nutrients.

- **Body**

Modern sedentary lifestyles are having a negative effect. The rise of obesity presents a major societal threat. Besides hyper nutrition, the main cause of obesity is a lack of physical exercise. A balanced healthy lifestyle demands the energy-output (activity) to equal the energy-input (food) to keep a constant body weight. Maintaining an active lifestyle enhances physical fitness, supports normal body weight, has a positive impact on overall health status and mental state and is a key component of healthy living.

- **Mind**

In a world that is moving faster, where time pressures are increasing and stress levels rising, it is difficult for people to find the time, energy or inclination with which to focus on creating a healthy balanced lifestyle. It is important to dedicate time to rest, relax and cultivate hobbies or personal development as the body-mind link plays a significant role in how the body handles stress, anxiety and depression, which are important factors influencing health. Furthermore, training the intellect is a means to support mental fitness in all life stages.

Amway actively raises Direct Sellers' awareness of these messages by offering training free of charge to thousands of direct sellers every year in every country where Amway is selling NUTRILITE™ products. Only in 2005, more than 350,000 Amway distributors were trained in more than 4,000 training sessions all over Europe. The Amway distributors share these messages with their customers during product promotion.



V.4 Food availability, physical activity and health education at the work place.

How can employers succeed in offering healthy choices at workplace canteens and in improving the nutritional value of canteens meals? What measures would encourage and facilitate the practice of physical activity during breaks and on the way to and from work?

A healthy workforce is a productive workforce. This has been recognized by forward-looking employers for decades. The provision of facilities at the workplace, or indeed in the vicinity of the workplace, should be supplemented by encouragement to participate in physical activity. Incentives can take many forms from providing a physical infrastructure (gym, changing areas, bicycle parking), to monetary incentives (free club membership, sponsorship of teams, etc).

In the United States, Amway's parent company, Alticor, has been running the *Optimal You* program for employees since 2004. *Optimal You* is designed to help employees live more balanced lives with a healthy work environment in which they could have access to the tools and resources they need. The program not only raises awareness on health and wellness but also provides courses and services designed to facilitate proactive action. All employees are encouraged to participate and have access to a company owned on-site fitness centre, trainers and nutritionists. Healthy meal options are offered in all the Alticor cafeterias and coffee shops.

A cornerstone of the program is the incentive of drastically reduced health insurance premiums and more than 70% of the employees participated in it during the 1st year. Importantly the progress of employees is monitored and the long-term impact on their behavior is being tracked. Of the 5000 employees who have taken up the *Optimal You* challenge 84% have said that the program motivated them to make lifestyle changes, 82% say that have a better understanding of their health as a result and 91% successfully achieved their goals.

Amway is at present planning a strategy to roll out the *Optimal You* concept for employees in Europe. However, the diversity of national EU markets means that such an exercise is far from straight forward.

The company has a history of encouraging sporting activities amongst its employees and direct sellers. Initiatives such as the Amway Europe Football Tournament are a fixture of the company calendar since a decade. Our partnership with UNICEF, falling under the One by One children's program, also encourages employees and direct sellers to raise funds through sports events and physical activity. The company is looking at ways in which to include physical activities and associated equipment in its direct seller orientated incentive programs.



V.9 Recommendations for nutrient intakes and for the development of food-based dietary guidelines.

How can gaps between proposed nutrient targets and actual consumption patterns be overcome? How can dietary guidelines be communicated to consumers?

A balanced diet is at the centre of the healthy living equation. Eating regular meals with plenty of fruit and vegetable can provide all nutrients needed to support health. However our modern living environments, life events such as pregnancy, occupations and activities may increase the gap between what we eat and the nutrients the body needs. Therefore in some cases we believe that supplementation with nutrients can be a practical and safe way to ensure an optimal supply of nutrients.

The adequate consumption of fruits and vegetables is seen to be the cornerstone of a healthy diet. Studies have shown that a majority of EU citizens do not eat the recommended five pieces a day. Lack of awareness, reduced availability and financial considerations make achieving the increased consumption of these foods difficult.

The European Food Supplements Directive has created a harmonized framework for offering safe and beneficial products to European consumers. Food supplements containing vitamins and minerals but also a vast range of other substances are recognized and accessible. Amway hopes that a further harmonization of the food supplements legislation will make available a wider range of safe and trusted food supplements to all European citizens.

The role that food supplements have to play should be more widely explained as part of nutrition and lifestyle education and information. Scientific research into the role of supplements should be encouraged and the findings communicated to consumers to allow them to make an informed choice.



V.11 Other issues

Are there issues not addressed in the present Green paper which need consideration when looking at the European dimension of the promotion of diet, physical activity and health?

Acknowledging the role of food supplements

Amway is disappointed that the Green Paper has failed to acknowledge the contribution that food supplements can make in achieving a healthy and balanced lifestyle. We would therefore encourage the Commission to take this into account and encourage measures that will aid understanding of supplements role and awareness of this amongst European consumers.

Integrating healthy lifestyle choices into health insurance

The increasing availability and reliance on private corporate health insurance schemes in Europe offer an opportunity to incentivize balanced lifestyle choices.

A cornerstone of the Amway's parent company Alticor's *Optimal You* program is the incentive of drastically reduced health insurance premiums and more than 70% of the employees participated in it during the 1st year. Importantly the progress of employees is monitored and the long-term impact on their behavior is being tracked. Of the 5000 employees who have taken up the *Optimal You* challenge, 84% have said that the program motivated them to make lifestyle changes, 82% said they have a better understanding of their health as a result and 91% successfully achieved their goals.

Amway would like to introduce a similar incentive in Europe however the uneven availability of such schemes across the EU makes this difficult.

Which of the issues addressed in the present Green Paper should receive first priority, and which may be considered less pressing?

Consumer education should be a priority if consumers are to be empowered to make their own choices on how best to achieve the balanced lifestyle suited to their own personal situation. These messages should be developed in partnership with stakeholders.

Progress will be much more efficient and have a more immediate impact if companies, scientists, regulators, and stakeholder groups work together and share information on the progress being made. Amway is therefore committed to working with other stakeholders to provide an answer to societal problems.

This paper represents the views of its author on the subject. These views have not been adopted or in any way approved by the Commission and should not be relied upon as a statement of the Commission's or Health & Consumer Protection DG's views. The European Commission does not guarantee the accuracy of the data included in this paper, nor does it accept responsibility for any use made thereof.