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**GREEN PAPER: PROMOTING HEALTHY DIETS AND PHYSICAL ACTIVITY:
TOWARDS A EUROPEAN STRATEGY OR THE PREVENTION OF OVERWEIGHT,
OBESITY AND CHRONIC DISEASES**

RESPONSE FROM THE MEAT AND LIVESTOCK COMMISSION

INTRODUCTION

The Meat and Livestock Commission (MLC) is an Executive non-departmental public body, established under the 1967 Agriculture Act, to improve the efficiency of the British red meat industry, taking account of the views of the consumer. We support efforts to improve diets at a national and European level and have been involved in a number of initiatives to help prevent and treat overweight and obesity. Within this framework we continue to promote lean red meat in the context of a healthy balanced diet and produce a variety of diet and nutrition education resources for use by health professionals, teachers and caterers. Produced in line with Government recommendation, these resources assist them in their role as nutrition educators to help people make informed and healthy choices in the context of their diet and lifestyle.

Our responses to the questions posed are based on the knowledge and experience of a range of professionals working in dietetics and nutrition, education, consumer research, marketing and food service. We welcome the opportunity to contribute to this consultation and agree with the need for an integrated approach to fostering health that combines the promotion of healthy lifestyles with actions aimed at addressing social and economic inequalities and the physical environment. We believe that if any initiative is to be effective it should involve all stakeholders and also agree that there does need to be a commitment to such an approach through other Community policies.

We feel it is essential for any policies developed in this area and subsequent actions taken to be backed by a strong evidence base. We endeavour to ensure such an approach underpins our activities and responses to consultations.

We have confined our response to our specific areas of expertise. Where questions are outwith our remit we have indicated this as 'not applicable (N/A)'.

RESPONSE TO QUESTIONS

Section IV.3.2

What are the concrete contributions which Community policies, if any, should make towards the promotion of healthy diets and physical activity, and towards creating environments which make healthy choices easy choices?

- Consumers increasingly look to food labels as a source of information on which to base their food choice. Whilst we appreciate efforts are presently in place to harmonization food labeling legislation throughout Europe, the process of completing this continues and further consultations on the matter have been issued. We believe that the goal of achieving a single approach to food labeling which is applied throughout the EU is long overdue. This will provide the consumer with consistency and in doing so will help boost the usability of food labels reducing the potential or different approaches to mislead the consumer.
- Similarly, there is a need for an agreed EU protocol for making health claims about foods. In the UK the Joint Health Claims Initiative (JHCI) has developed a voluntary code of claims that can withstand scientific substantiation. Similar approaches have been adopted in other EU countries. However, there is a need for a harmonized approach to be adopted in order that food processors and manufacturers from different countries are working to a similar all be it voluntary template and none are unfairly disadvantaged over others. For example a number of French dairy producers are making claims about their produce containing enhanced levels of n-3 fatty acids. These claims if made in the UK would not conform to the code approved by the JHCI. Such anomalies need to be addressed at EU level.
- The MLC has worked with the British Meat Products Association (BMPA) and the Food and Drink Federation (FDF) to form a Joint Salt Working Group (JSWG). This group has developed an industry action plan to reduce the sodium content of a variety of meat products. This has been discussed at length with the Food Standards Agency (FSA) which is shortly to issue new category specific salt reduction targets. Of concern is that the achievement of these targets in the UK could disadvantage British produce, especially if consumer taste preferences continue to favour higher sodium imports. We would request that similar reformulation strategies are supported and promoted in all other EU countries for the collective good.

Which kind of Community or national measures could contribute towards improving the attractiveness, availability, accessibility and affordability of fruits and vegetables?

N/A

On which areas related to nutrition, physical activity, the development of tools for the analysis of related disorders, and consumer behaviour is more research needed?

- Over the past twenty years and more the red meat industry in the UK has achieved significant reductions in the fat content of beef, lamb and pork. Today British beef typically contains only 5% fat, lamb 8% and pork 4%. This has been achieved by a combination of improved animal husbandry and modern seam butchery techniques. About half the fat in lean red meat is unsaturated and there is the potential to further manipulate the fatty acid profile of meat in favour of the cardio-protective n-3 fatty acids. A number of EU funded projects are presently investigating ways in which animal husbandry practices can be modified so as to improve the fatty acid profile of meat and milk, with the goal of an economically viable method of production for such foods. However, this work will only yield benefit to the consuming public if they understand, accept and value the end result as a benefit to their health. Further research to establish consumer views and potential acceptance or rejection of developments in this field is necessary in order to fully exploit the outcomes of this research.

Section IV4.3

How can the availability and comparability of data on obesity be improved, in particular with a view to determining the precise geographical and socioeconomic distribution of this condition?

- The availability of data on obesity in the UK is in our opinion not lacking. Indeed organizations such as the National Obesity Forum, the Association for the Study of Obesity (ASO) and Dietitians in Obesity Management in the UK (DOM UK) have all helped disseminate information and the results of research on obesity throughout the UK. Collectively they have helped raise the profile of obesity on the political agenda and a sharing of best practice on intervention strategies. However, one shortcoming is that currently there is no financial incentive for General medical Practitioners in the community to address this problem from either a prevention or treatment perspective. While this situation continues there are bound to be disparities between services in different areas.

How can the programme contribute to raising the awareness of the potential which healthy dietary habits and physical activity have for reducing the risk for chronic diseases amongst decision makers, health professionals, the media and the public at large?

- The programme can contribute to further raising awareness by offering support to the plethora of existing initiatives currently underway by both public and private organizations. It could act as a forum for sharing and promoting best practice thus ensuring limited resources are not misdirected. By endeavoring

to ensure that the basic messages are consistent regardless of the channel of communication and the country it is disseminated in, these various communications could collectively help to reinforce and strengthen the impact of messages received by the public at large. This will be particularly challenging with regard to the media who persistently mis-represent diet and health story lines by adopting sensationalist stances. Such reporting often results in the public becoming confused, apathetic or complacent about their own health and wellbeing, wrongly believing that there is no agreement among experts.

Which are the most appropriate dissemination channels for the existing evidence?

- No single channels of dissemination can on its own be hoped to be sufficient. Numerous routes need to be used to reach the general public but any information provided must be tailored to the needs of the target audience. For this reason the MLC produces a range of resources targeted at different groups whether they be primary school children, teachers, caterers or health professionals. The contents of these resources reflect the needs of the intended recipient group.
- Clearly health care professionals and teachers have a direct role to play in communicating with their clients and students on diet and health, but many others such as caterers, butchers, retailers and food processors and manufacturers all have a part to play in influencing food choice and selection.

Section V.1.2.

When providing nutrition information to the consumer, what are the major nutrients, and categories of products, to be considered and why?

- The Institute for Grocery Distribution (IGD) is a charitable body and a research and training organisation for the food and grocery chain in the UK. It provides a forum for discussion to develop and share best practice.
- In 1998, following collaboration between government, consumer organisations and the food industry, IGD published guidelines for voluntary nutrition labelling including the use of Guideline Daily Amounts (GDAs) for calories, fat and saturated fat, for men and women.
- Most recently in light of consumer demand for more information to help them understand food labelling the Industry Nutrition Strategy Group (INSG) on behalf of the IGD reviewed GDAs. Updated GDAs have now been developed for men, women and children and the range of nutrients has been extended to include GDAs for total sugars, carbohydrate, protein, fibre, salt and sodium (see Appendix 1). These are consistent with the latest published scientific data on dietary. It also provides guidance to industry on the best way to present the

GDA on the back of pack following the recommendations made from in depth consumer research.

Which kind of education is required in order to enable consumers to fully understand the information given on food labels, and who should provide it?

- In order to fully understand the information given on food labels consumers need to be able to put the nutritional contribution of a particular food into the context of the whole diet. The review and updating of GDAs in the UK was an attempt to do this. The Multiple Traffic Light (MTL) signposting initiatives proposed by the FSA is an attempt enable consumers to draw comparisons between foods.
- MLC's own research has found that consumers identified two main drivers for communication. Firstly, the need for simplicity which is best addressed through "colour coding". The consumer is inundated with marketing messages and to achieve any level of noticeability a simple "at a glance" style was preferred which was demonstrated by the preference for an MTL format. Secondly, the consumer expressed a need for more detailed information to support the MTL. This is felt to be most appropriately positioned on the back of the pack.
- The MTL system would instantly communicate a product's good and bad points to the consumer. Over time this should begin to shift consumption from "less healthy" to "more healthy" products. However in its current form it is a blunt tool and the banding criteria as set at present provides little incentive for manufacturers and processors to adjust product formulations, as the MTL colours will probably not alter to reflect many of the changes made to either fat or sodium.
- Current manufacturer/retailer schemes which have been introduced in the UK recently seem to perform a similar role to MTL. It remains to be seen to what extent the consumer is confused more than aided by a range of schemes, however successful they may be individually. Inconsistencies between the various schemes could prove to be misleading.

Are voluntary codes ("self-regulation") an adequate tool for limiting the advertising and marketing of energy-dense and micronutrient-poor foods? What would be the alternatives to be considered if self-regulation fails?

- Most large food producers and manufacturers are being increasingly forced into demonstrating a responsible approach to their social marketing policy. A number of self regulated steps have already been taken by for example the retailers who have removed confectionery from checkouts. It is likely that further similar steps may follow and voluntary codes developed to demonstrate that the food industry is taking a responsible approach to diet and health in its advertising and marketing.

- If these voluntary codes are unsuccessful in uniting the food industry or in having the desired effect because they do not go far enough, the use of legislation should be considered.

How can effectiveness in self-regulation be defined, implemented and monitored? Which measures should be taken towards ensuring that the credulity and lacking media literacy of vulnerable consumers are not exploited by advertising, marketing and promotion activities?

- The IGD INSG are about to set up a number of specialist working groups to consider a variety of issues in this area. These include the following work streams:
 - 1) Consideration of the various models being proposed by the FSA and others to identify areas of conflict and make recommendations to retailers and caterers where appropriate.
 - 2) Examine how the nutrient density of food consumed impact on micronutrient intake particularly among vulnerable groups and those at risk of deficiency.
 - 3) Identify and examine the barriers to fruit, vegetables and wholegrain intake and develop strategies to overcome them.
 - 4) To build upon links with the BNF to facilitate the accurate interpretation of dietary intakes and help ensure that dietary recommendations and guidance are based on accurate quality data.

The later work stream is intended to facilitate a dialogue between the food industry and the EuroFIR project. Industry will be encouraged to provide nutrient analysis data for their food products to a quality standard, and in doing so support the accuracy of a Europe wide database.

Section V.2. Identifying best practices

How can consumers best be enabled to make informed choices and take effective action?

- Consumer education is key to building knowledge and understanding about how to make informed food choices. Behaviour change is notoriously difficult to achieve and can only be expected to happen if underlying attitudes are addressed. A multi tiered approach will be necessary with food education beginning in schools, supported with resources and reinforced by explanatory literature appropriately targeted for the intended audience. A number of successful school-based initiatives have been launched in UK schools. These support a whole school approach through which non-curricular activities reflect

healthy lifestyle information provided in lessons. Most recently we were involved in developing a new web site for primary teachers and pupils. 'Food: A Fact of Life' was developed and hosted by the British Nutrition Foundation (BNF) and supported by BMES, British Potato Council, Home grown Cereals Authority, Milk Development Agency and Horticultural Grower Association. The website provides advice, support and downloadable resources for teachers about healthier eating in school.

- Retailers and food manufacturers are well placed to provide their customers with clear information about how their produce can contribute to a balanced diet. The provision of meal ideas and recipes can help put healthier food selection and cooking practices into action.

What contributions can public-private partnerships make toward consumer education?

- There are numerous examples of such partnerships that have made positive contributions to consumer education. The MLC was instrumental in bringing together a group called Partners in Public Sector Catering Forum (PPSCF). It comprised representatives from all the various catering sectors in the public domain, government departments and charitable organizations such as the British Nutrition Foundation (BNF). The group considered the challenges faced by caterers in this arena and identified that tailored diet and nutrition training materials were much needed. As a result a CD ROM was produced providing caterers with a tool box of resources which could be tailored to individual needs to ensure healthier eating practices are being adopted appropriately and in line with the nutritional needs of clients.

In the field of nutrition and physical activity, which should be the key messages to give to consumers, how and by whom should they be delivered?

- The IGD Industry Nutrition Strategy Group considered this question some time ago and as a result has developed an agreed list of healthy lifestyle messages (see Appendix 2). This prioritised series of healthy lifestyle messages aims to provide consumers with simple and consistent messages on maintaining a healthy lifestyle. They are suitable for many different modes of communication from food packaging to point of sale material and websites, and they will be used throughout the food industry.
- The food industry is taking a number of proactive steps to further enhance the nutritional profile of its products and to improve information provided to the consumer either via labelling or in leaflets and other forms of off-pack information.

Section V3.2. identifying best practices:

What are good examples for improving the nutritional value of school meals, and how can parents be informed on how to improve the nutritional value of home meals?

- All school children have four choices at lunchtime, a school meal, a packed lunch, a meal purchased away from the school or to eat nothing. The MLC believe the best choice for all schools is that of a school lunch as it keeps students on site during the lunch break, doesn't require the need to refrigerate food brought in from home and has a positive impact on levels of concentration.
- A successful school meals programme requires to be part of a whole school approach which is centred on the importance of a healthy diet and lifestyle. The food provision must reflect the messages delivered in the classroom and engage both pupils and their parents.
- Meals should be served quickly to minimise queuing and feature popular foods, such as pasta, rice or noodles together with a popular protein foods such as lean red meat. Adherence food and nutritional based standards should help ensure the nutrient profile of the meals provided reflect the needs of the children. The CD ROM we produced for caterers gives a variety of ideas to enable caterers to improve the nutritional standards of food served at school. It includes training support materials on a variety of topics including the provision of special diets and contains a series of checklists that enable caterers to quickly assess nutritional standards. A selection of popular recipes using healthier catering practice and encouraging the inclusion of fruit and vegetables in the dish are also given.
- The school fruit scheme in primary schools has made a start in encouraging pupils to eat fruit but it is our belief that a balanced meal for all age groups is the best possible school meal and that the pricing structure for school meals should be for the whole meal and not priced as individual elements which allows the pupil to opt out of the healthier parts of the meal. As such we would like to see, for example, a two course meal in Secondary schools at a fixed price with the meal based on one portion of protein and carbohydrate and two portions of fruit and vegetables and a fruit or milk based dessert.
- Schools should also, as a matter of best practice, send home the school meals menu to all parents (Derbyshire CC and Hertfordshire CC do this) regardless of whether the pupil has a meal or not. These menus can also be used to carry healthy eating messages into the home.

What is good practice for the provision of physical activity in schools on a regular basis?

N/A

What is good practice for fostering healthy dietary choices at schools, especially as regards the excessive intake of energy-dense snacks and sugar-sweetened soft drinks?

- N/A

How can the media, health services, civil society and relevant sectors of industry support health education efforts made by schools? What role can public-private partnerships play in this regard?

- As previously mentioned the British Meat Education Service (BMES) has been producing nutrition education resources linked to the curriculum for some years. These are targeted at specific key stages and are supported by a website www.bmesonline.co.uk. All resources conform with Government recommendations and position lean red meat as part of a balanced diet and healthy lifestyle. Unlike other resources we do not overly state the importance of our products (i.e. lean red meat). However, we do stress that lean red meat is a useful source of haem iron in the diet, which is known to be lacking in certain vulnerable groups in the UK, such as school children.

Section V.4.1 identifying best practices,

How can employers succeed in offering healthy choices at workplace canteens, and in improving the nutritional value of canteen meals?

- Current figures from the British Hospitality Association's (BHA) annual Food & Service Management Survey (covering 2005) shows that the number of meals served in the workplace as being 9,228 million per annum making it the single biggest market for contract caterers.
- Given that many workplace dining facilities have been sub-contracted to third party service providers it is important that the contract for the supply of catering covers the provision of healthy choices and if necessary even subsidises the meal price for the healthier dish options as a means of encouraging consumption.
- It is important to remember that employees have a choice when it comes to eating at work. This in many cases sees the employee leaving the work environment and purchasing food in the High Street. This trend, coupled with the ever-increasing cost of office space, has seen many work place eating areas either removed or substantially reduced in size. In some cases only vending machines are provided.
- Add to this the ever decreasing length of the lunch-time break, now estimated by contract caterers to be little more than 25 minutes, and the opportunity for delivering healthy eating messages and the ability to serve a healthier meal are very often seriously reduced.

- Where a sit down meal is served, facilities managers should specify in their contract to caterers, that the range of meals cooked should attempt to reduce the amount of deep fat fried foods, increase the amount of fruit and vegetables (and salad) served and offer a broad base of nutritionally balanced meals including a lean red meat options.

What measures would encourage and facilitate the practice of physical activity during breaks, and on the way to and from work?

N/A

Section V.5.1:

Which measures, and at what level, are needed to ensure a stronger integration aiming at promoting healthy diets and physical activity into health services?

- N/A

Section V.6.1:

In which ways can public policies contribute to ensure that physical activity be “built into” daily routines?

- N/A

Which measures are needed to foster the development of environments that are conducive to physical activity?

- N/A

Section V.7.1

Which measures, and at what level, would promote healthy diets and physical activity towards population groups and households belonging to certain socioeconomic categories, and enable these groups to adopt healthier lifestyles?

- N/A

How can the “clustering of unhealthy habits” that has frequently been demonstrated for certain socio-economic groups be addressed?

- N/A

Section V.8.2:

Which are the most important elements of an integrated and comprehensive approach towards the promotion of healthy diets and physical activity?

- Consistency of message between the various communication channels is essential in order to dispel myths that the experts are not in agreement, In addition communications need to be tailored to their audience.

Section V.9.3

In which way could social and cultural variations and different regional and national dietary habits be taken into account in food-based dietary guidelines at a European level?

- Food based dietary guidelines need to be culturally specific, socially acceptable and encompass examples that are relevant to the population group. It is hard to see how a single set of guidelines can work across Europe. Unlike nutrient guidelines, they need to be carefully targeted. Realistic goals will need to be set based on a step-wise approach involving industry. Industry will need to have incentives to stimulate product innovation and improve consumer access to healthier choices

How can the gaps between proposed nutrient targets and actual consumption patterns be overcome?

- As previously indicated bridging the gap between nutrition targets and actual consumption patterns needs multi-stakeholder involvement. The work of the Joint Salt Working Party with the FSA illustrates the importance of this as means of helping achieve the salt reduction targets set for the UK.

How can dietary guidelines be communicated to consumers?

- In line with the FSAs food selection model the MLC has developed a model to interpret dietary guidance. Called Getting the Balance Right (See Appendix 3) this plate model is at the core of all our diet and nutrition education resources and as previously mentioned it is also featured on our CD ROM for caterers. Consumer awareness of such models increases when a number of communication channels are used. Our model has been particularly well received by health professionals who tell us that they particularly like the quality of the photography and the wide variety of foods featured. Efforts were made to ensure that each food group was equally pictorially attractive as often the fruit and vegetables group dominate over the others. We have shared this imagery with a number of other organizations including the British Diabetic Association and have provided the FSA with our evaluative research on our model to consider as part of their review of their model the Balance of Good Health.

In which way could nutrient profile scoring systems such as developed recently in UK contribute to such developments?

- This model was specifically developed as a means of restricting the advertising of certain food to children. As such it has limited potential for developing for other uses.

Section V.10.2

Under which conditions should the Community engage in exchanging experience and identifying best practice between the EU and non-EU countries? If so, through which means?

- It is important that any new initiatives build on and extend existing networks such as the European Network of Health Promoting Schools and other established networks of the Council of Europe.

Section V.11.

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?

- With the continued growth of out of home eating and in particular the growth driven by ‘snacking’ and ‘hand-held meals’ the paper does not address the delivery of health messages and the provision of healthy meals in dining sectors such as pub and restaurants and fast food outlets.
- A clear lead from the EU to catering operators along with targets for numbers of healthy meals offered on menus and served to customers should be considered along with a simple, common to all, signposting scheme to which all operators can subscribe.

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

- We agree that a dual approach addressing both diet and physical activity is needed. However, to date diet seems to have been given the greater attention with numerous high profile initiatives already happening in for example schools and developments in food labeling in the retail sector. In contrast initiatives focusing the promotion of activity are less in evidence.

ADULTS

	Guideline Daily Amount		
	MEN	WOMEN	ADULTS
Energy (Calories)	2500	2000	2000
Fat (g)	95	70	70
Saturated Fat (g)	30	20	20
Carbohydrate (g)	300	230	230
Total Sugars (g)	120	90	90
Non Milk Extrinsic Sugars (NMES) (g)	65	50	50
Protein (g)	55	45	45
Dietary Fibre (AOAC) (g)	24	24	24
Dietary Fibre (Non Starch Polysaccharide - NSP) (g)	18	18	18
Sodium (g)	2.4	2.4	2.4
Salt (g)	6	6	6

GIRLS

	Guideline Daily Amount			
	4 – 6 Years	7 – 10 years	11 – 14 years	15-18 Years
Energy (Calories)	1550	1750	1850	2100
Fat (g)	60	70	70	80
Saturated Fat (g)	20	20	25	25
Carbohydrate (g)	195	220	230	265
Total Sugars (g)	75	85	90	105
NMES (g)	40	50	50	60
Protein (g)	20	28	41	45
Dietary Fibre (AOAC) (g)	12	16	20	24
Dietary Fibre (NSP) (g)	9	12	15	18
Sodium (g)	1.1	1.8	2.4	2.4
Salt (g)	3	5	6	6

BOYS

	Guideline Daily Amount			
	4 – 6 Years	7 – 10 years	11 – 14 years	15-18 Years
Energy (Calories)	1700	1950	2200	2750
Fat (g)	65	75	85	105
Saturated Fat (g)	20	25	25	35
Carbohydrate (g)	215	245	275	345
Total Sugars (g)	85	100	110	140
NMES (g)	45	55	60	75
Protein (g)	20	28	42	55

Dietary Fibre (AOAC) (g)	12	16	20	24
Dietary Fibre (NSP) (g)	9	12	15	18
Sodium (g)	1.1	1.8	2.4	2.4
Salt (g)	3	5	6	6

CHILDREN AGED 5 – 10 YEARS

	Guideline Daily Amount
	5 – 10 Years
Energy (Calories)	1800
Fat (g)	70
Saturated Fat (g)	20
Carbohydrate (g)	220
Total Sugars (g)	85
NMES (g)	50
Protein (g)	24
Dietary Fibre (AOAC) (g)	15
Dietary Fibre (NSP) (g)	11
Sodium (g)	1.4
Salt (g)	4

KEY MESSAGES

- Eat and enjoy a variety of different foods, in moderation.
- Enjoy an active lifestyle.
- Maintain a healthy weight; balance the amount that you eat with your level of activity.
- Drink plenty of fluids.

SUPPORTING MESSAGES

- Eat at least 5 portions of fruit and vegetables every day.
- At every meal include a starchy food such as pasta, rice, bread, cereals (ideally wholegrain), potatoes, beans and pulses.
- Be aware of the fat in food especially saturated fat and how much you eat.
- Be aware of salt in food and how much you add.
- Be aware of sugar in food and drink and how much you add.
- Use GDAs to choose foods for a balanced diet.
- Know your GDA for.....
- Alcohol is a source of calories, drink sensibly.
- Include sources of protein such as meat, fish, milk products, eggs, nuts or pulses every day.
- Eating calcium rich foods everyday is important for bones and teeth.
- Eating iron rich foods is important for your blood and energy levels.
- Eat at least 2 portions of fish a week, one of which should be oil-rich.
- Omega 3 oils are an important part of a balanced diet.

enjoying a healthy diet is all about
getting the balance right

fruit & vegetables

bread, other cereals & potatoes

meat, fish & alternatives

milk & dairy foods

foods containing fat, foods & drinks containing sugar

There are no healthy or unhealthy foods - only healthy or unhealthy diets

- Select a variety of foods from each group in the proportions shown
- Eat at least 5 portions of fruit and vegetables a day
- Eat foods containing fats and sugars sparingly and select lower-fat options where possible
- Eat less saturated fat
- Eat less salt
- Drink plenty of fluid - 6 to 10 cups or glasses a day

- enjoy your food!

The British Dietetic Association supports the food selection guide as a useful tool to convey the principles of a healthy and balanced diet for adults and children over the age of 5 years.

This food selection guide is based on 'The Balance of Good Health' with local permission of the Food Standards Agency.

2006

Reference: IGD. (2006) Best Practice Guidance on the Presentation of Guideline Daily Amounts

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