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CADBURY SCHWEPPES RESPONSE TO EU GREEN PAPER: PROMOTING HEALTHY DIETS AND PHYSICAL ACTIVITY

Background

As one of the largest UK-based food and drink companies and the EU's leading beverage and confectionery company, Cadbury Schweppes is pleased to have the opportunity to respond to the EU Green Paper on Promoting healthy diets and physical activity

Cadbury Schweppes manufactures, markets and distributes its branded products in over 200 countries and employs over 50,000 people worldwide including around 14,000 in the EU. We have a long history of engagement with policymakers in the UK and welcome the opportunity to comment on the Green Paper and support measures to further develop strategic policies to promote health and well being.

We have enclosed a response to the questions raised in the consultation paper within our expertise and in addition endorse the detailed responses by our industry organisations, the UK Food and Drink Federation (FDF), CIAA and the World Federation of Advertisers.

IV.3 HEALTH ACROSS EU POLICIES

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?

There is no magic bullet in tackling a complex issue such as these. Cadbury Schweppes believes that in order to deliver sustainable solutions to the issues, any Community policies must be made with the benefit of sound science and consumer understanding, and avoid outcomes that are arbitrary, simplistic or misleading.

The Community could have an important role in enabling the sharing of views and exchange of best practice as opposed to legislation. One of the concrete contributions which Community policies can make is to ensure that they continue to encourage/ support initiatives such as the Platform to exchange best practice and

Working together to create brands people love











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keep the dialogue alive.

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?

It is essential that more comprehensive high quality data is gathered on current nutrient intake within the EU population along with some measure of the health status of the population, such as blood pressure and urine sodium. Without this it will be impossible to track whether policy measures have had the desired effect on consumption patterns.

Changes in diet are not an end in themselves. Their purpose is to reduce the incidence, burden of ill health and mortality from chronic diseases. It is therefore also necessary to collate information on incidence and morbidity from diseases against which preventive health promotion efforts are targeted. This data, together with the cause-specific mortality data already recorded, are essential if adequate assessment of the effectiveness of programmes is to be carried out. In particular these data will allow the relative cost effectiveness of primary and secondary prevention to be compared with the costs of treatment (or non-treatment) of specific diseases.

It is of fundamental importance that the Community's research efforts are not only concentrated on research into diet and food. There is a distinct lack of research and data on physical activity. Since the issue of obesity is multifactoral then both diet and activity must be thoroughly researched. Suggested themes are: research into the barriers to physical activity among some socio economic groups, the impact of levels on physical activity on dietary choices.

IV.4 THE PUBLIC HEALTH ACTION PROGRAMME

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?

This data is ideally collected at the same time, and on the same sample of individuals, as those involved in robust dietary surveys. This will allow comparison of obesity prevalence between socio-economic groups and geographical locations, and assessment of any correlation with particular dietary habits. There is no need to start from scratch, but a need to collate information from existing national dietary surveys, such as the NDNS, which is about to be re-launched in the UK.

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?

By promoting positive, clear and consistent evidence-based messages.

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

V. AREAS FOR ACTION

V.1 CONSUMER INFORMATION, ADVERTISING AND MARKETING

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

Cadbury Schweppes is introducing a global standard for the provision of nutrition information on its products. This standard includes the more comprehensive "Big 8" nutrition labelling on pack and Guideline Daily Amounts (GDAs) for adults. GDAs, where they exist, are a measure of nutritional requirement based on daily average intakes, and aid the construction of sound diets from a variety and choice of differing foods. Our new global standard also provides for nutrition information based per 100 g or per 100 ml and on the basis of a defined portion or serving size.

Cadbury Schweppes nutrition labelling global standard

Nutrition Information per 100ml/100g per pack/unit/serving

Energy	kJ (kcal)	kJ (kcal)
Protein	g	g
Carbohydrate	g	g
(of which sugars)	g	g
Fats	g	g
*(of which saturates) g		g
Fibre	g	g
Sodium	g	g

*Omit if fat is 0g or "traces" (less than 0.1g)

GUIDELINE DAILY AMOUNTS Woman Man Energy Fat

Packaging size may not always permit all the information to be displayed, in which case we will make it available to consumers in other ways including consumer web sites. We will continue to explore new ways to convey this information, as well as

communicating messages to help educate the consumer. We always ensure that our labelling always complies with, and often exceeds, local regulatory standards.

We welcome and support government efforts to help consumers make more informed choices by understanding how products fit within a balanced diet and lifestyle. Our consumers tell us they do not want systems that demonise foods that they already understand and enjoy - just simple and clear information. We are helping consumers by giving them the information they have told us they want so that they can make decisions for themselves.

GDA labelling

In the UK Cadbury Schweppes has been engaged with the Food Standards Agency in numerous consultations on labelling in the last few years. In order to support the FSA in addressing a challenge of this magnitude and to submit a detailed response FSA's initial consultation on signpost labelling in April 2005 we undertook consumer research¹ on front of pack signposting based on the FSA proposed nutrient profiling model. The full summary of the research is attached at Annex 1. We have shared this research with the Food Standards Agency and explained that although we recognise the importance of providing a scheme that will genuinely work for the consumer, it is clear from our research that traffic light labelling as currently proposed does not fulfil this requirement.

Based on the findings from our research we have now moved to determine a labelling solution to help consumers build and strengthen their understanding around food and nutrition. As a result we have developed a major new consumer education initiative that Cadbury Schweppes is undertaking to help people understand better how treats such as chocolates and sweets can be enjoyed as part of a balanced diet and lifestyle. We enclose the full detail information on this 'Be treatwise²' initiative in Annex 2.

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?

Although appropriate and clear labelling can give information to consumers about the food they buy, it should not form the only part of educating the public about how to eat a balanced diet.

Although we are willing to play our part in educating consumers, national governments also have responsibility (as recognised in WHO Report 916 "Diet, nutrition and the prevention of chronic diseases").

¹ Emailed as CS Green Paper response Annex 1 signpost research

² Emailed as CS Green Paper response Annex 2.1 and 2.2 Be treatwise

Along with the wider food industry, Cadbury Schweppes is determined to work with Government and other stakeholders to help consumers eat more balanced diets. In the UK we have offered and continue to offer a comprehensive joint industrygovernment funded education campaign to help consumers understand how food fits into a healthy lifestyle.

We have committed to educating our consumers by including:

- A new "Be treatwise³" icon on the front of packs to reinforce the need to understand the role of treats within the overall context of food intake and energy expenditure.
- The UK government endorsed message "Be active for 30 mins per day" to be included on packs. Millions of packs will be a powerful communication vehicle supporting consumer education.
- Enhanced labelling to help consumers better understand guideline daily amounts (GDAs) and the role our products play within their overall diet and lifestyle.

Are voluntary codes ("self-regulation") an adequate tool for limiting the advertising and marketing of energy-dense and micronutrient-poor foods?

We refer to the submission of our industry association the World Federation of Advertisers.

With regard to Advertising to children: Cadbury Schweppes has taken a selfregulatory approach globally. Cadbury Schweppes does not advertise to children under 8 nor use visuals of children under 8 in our marketing communications, including vending. This has been our global position since Sept 2004 and in the UK since 2001.

Cadbury Schweppes has a Global Marketing Code of Practice⁴ with specific reference to children, which is attached as Annex 3 and includes guidelines on:

- the use of fictitious, real or licensed characters
- supporting the role of parents and guardians, and not encouraging pester power
- not using fantasy, including animation in any way that can encourage poor dietary habits or less than sensible consumption
- not creating a sense of urgency or price promotion
- clearly understandable language and visuals, particularly around promotions
- not misrepresenting the potential benefits of consuming the product
- not relating to the content of a program when we advertise adjacent to it

³ Emailed as CS Green Paper response Annex 2.1 and 2.2 Be treatwise

⁴ Emailed as CS Green Paper Annex 3 CS Marketing code

 encouraging the sound use of the product with a view towards proper nutritional development and good nutritional practices

What would be the alternatives to be considered if self-regulation fails?

Cadbury Schweppes does not believe that any universal nutrition profiling can be used fairly to assess whether or not an individual food is 'healthy' and can therefore be advertised freely.

We have significant concerns with the UK Food Standard's Agency's profiling model, or indeed the extent any similar model which attempts to distil a product's nutrient composition into a single score, can help provide a sound scientific basis for the comparison of the nutrient content of foods. We are unable to support the model and a full explanation is given at V.9.

V.2 CONSUMER EDUCATION

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

Governments have the primary responsibility to ensure that their populations receive education about food and nutrition. Within the syllabuses/curricula and educational framework set by governments industry has a responsibility to provide support in the form of expertise and materials to complement government's information.

Industry has a role to deliver a range of information and education materials to help consumers better understand the role of their products within a balanced diet and are ideally placed to play an important part, in conjunction with Government, in the information and education arena.

Individuals should be encouraged to take responsibility for their own health, but to do so they need to have appropriate skills and ready access to information and wide range of food and health choices. Industry believes that it contributes to helping empower individuals to make the right choices by providing information about the food it produces.

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

As part of the private sector we are determined to play our part in finding solutions to issues such as obesity, and where we can partner with the public sector to do so, we will.

We are taking a co-ordinated approach across our business, making it a central part

of the way we operate. Our **12 Point Plan** was launched in September 2004 and the information below is a progress report as of September 2005.

1. Products and Innovation

Through innovation we're investing in the development of new products within every category that will provide consumers with more choice. These include lower calorie offerings and new sweetening options. In addition, we're reducing trans-fats and salt content in our products and have discontinued making products which contain embedded toys.

2. Marketing

We've introduced a global marketing code of practice with specific reference to children. We don't advertise to children under eight years where they're the majority of the audience.

3. Portion Sizes

We've reviewed our single-serve portion sizes around the world and are providing a broader range of smaller portion options.

4. Labelling

We're looking for ways to help people make more informed choices. This includes providing more information about our products and ingredients and messages to help educate the consumer. We've launched a new global labelling standard.

5. Vending

We don't vend our confectionery or carbonated soft drink products in primary schools and will only vend these products in secondary schools by invitation and in line with nutritional guidelines set by the school. Guidelines for vending are included within our global marketing code of practice.

6. Consumer Insight

We continue to invest in consumer research that helps build our knowledge around health concerns, including obesity. We're using and sharing our consumer research and expertise to help improve understanding of concerns, both within and outside our business.

7. Education

We continue to support initiatives that promote physical activity and responsible consumption of our products. We're also helping to build understanding of the "energy equation" particularly amongst children.

8. Community

As part of our wider corporate social responsibility programme we'll continue to support initiatives that promote physical activity and education that helps improve

consumer health and prevent obesity.

9. Business Partners

We're asking our business partners and suppliers to support our responses to obesity and consumer health concerns.

10. Employees

We're active in helping our people understand and improve their own health and well-being.

11. Science

We work with the scientific community and base our decisions on sound science. We're investing in new science and increasing our scientific resources within our business.

12. Other stakeholders

We're working with others (including government, campaigners, shareholders and customers) to help find solutions.

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 to?

Any messages on food and health need to be positive, easily understood and consistent.

A long-term strategic approach (at least 10-20 years) to messaging is fundamental to influencing behavioural change - anything less than this would only create awareness. This may not be the preferred choice of politicians who want to achieve success in line with electoral timetables. It is imperative that the Community supports a long-term approach as the right way forward.

Messages should support the references to physical activity as well as balanced diets. We strongly support messages around the role of treats in moderation within the context of a balanced diet.

The widest communication of such messages is desirable. Industry and governments can work together to achieve this objective. As outlined above we have already committed to using our packs to endorse government messages on healthy lifestyles.

V.3 A FOCUS ON CHILDREN AND YOUNG PEOPLE

What are 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?

We would urge decision makers to consider the importance of a whole school approach to food. This would include education processes that teach children to appreciate the value of food (including its farming and production) and its role in diet and balanced lifestyle. School food needs to be seen in the context of balanced lifestyles, the real food environment and the global marketplace in which we operate.

Banning certain foods in schools will not, in our view, deliver the objective of helping children enjoy balanced diets. Instead, action should be channelled towards sustainable and culture-changing solutions and industry should be viewed as an ally in this process. We believe the most constructive way forward is to build on joint expertise and work in partnership with governments and other relevant bodies to tackle consumer health concerns through education and prevention, based on sound and robust science.

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

This is not within Cadbury Schweppes' area of expertise.

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?

Our products have been enjoyed safely as treats for over a hundred years and the role of confectionery is well understood. In view of consumer health concerns, particularly in relation to children, we also have a well-established global position on vending that we will not vend in primary schools and will only vend in secondary schools by invitation.

We disagree that banning products from schools is the only way to limit the excessive intake of energy-dense snacks and sugar-sweetened soft drinks because:

- Children are generally permitted progressively greater freedom to make choices for themselves as they grow older, and a distinction should be made between children and young adults. Young adults have an energy requirement in excess of older adults. Confectionery provides energy, nutrition and mental alertness when they need it, ensuring that individuals can survive the hectic schedules and activities that are part of being in education.
- We believe that creating an artificial food environment is counter-productive to helping students make choices from a wide range of available products and

developing this as an important life skill. Instead of demonizing certain foods, children should be educated to understand the role of treats in the context of a balanced lifestyle.

- Vending machines can be programmed not to vend at set times during the day, a facility which is already taken up by some schools.
- Children will learn about how to balance their diet if they receive positive consistent messages from a variety of sources and occasions in schools. We would urge decision makers to give a fundamental rethink of the importance of a 'whole school' approach to food. This would include education processes that teach children to appreciate the value of food (including its farming and production) and its role in diet and balanced lifestyle. School food needs to be seen in the context of balanced lifestyles, the real food environment and the global marketplace in which we operate.

We do recognise that children may not always be able to make appropriate choice and acknowledges that the school environment is different from the high street: it cannot, however, be entirely insulated from it. Along with the wider UK food industry we have begun to explore the feasibility of developing a scheme, based on Target Nutrient Specifications (TNSs) and food categories and linked to portion sizes and GDAs (Guideline Daily Amounts), to introduce restrictions on non-lunch food in schools.

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?

By establishing credible and consistent food and health messages.

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 improving the nutritional value of canteen meals?

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

We believe that employers have a to play in helping both its employees and the communities in which it operates to lead balanced lifestyles. We have a long tradition of looking after our employees and part of that commitment today still involves helping them keep fit, healthy and feeling good about themselves. In the UK to help increase employees well-being both at home and in the work place, the company has

introduced the *Fit for Life* initiative. *Fit for Life* is a lifestyle and activity programme being introduced to all Cadbury Schweppes employees throughout the UK. Each employee is provided with a *Fit for Life* booklet to keep them informed about the initiative and to encourage participation in the programme.

Fit for Life focuses on four key areas of health and well-being:

1) Activity

A range of initiatives has been introduced to encourage greater participation in physical activity. For example, employees have raised thousands of pounds for charity in a fun run through Birmingham, and a further £8,000 has been raised for Colon Cancer Concern by employees taking part in a 5K fun run. In addition, organised group walks around Bournville on two lunchtimes per week help to raise money for a local hospice. Employees are also provided a subsidy to buy a bicycle as part of the Bikes 4 Work initiative.

2) Balance and relaxation

Courses designed to help employees relax and relieve stress have been introduced. A lunchtime coaching session teaches employees effective techniques for relaxing at work and at home, and a back-care scheme has been a great success, with a third of the depot's 180 staff involved.

3) Nutrition

Recognising the importance of a varied, balanced diet, we are working closely with our caterers to ensure employees have access to a full range of nutritious food. We are clearly identifying lower calorie options, for example, and encouraging consumption of the recommended 5 portions of fruit and vegetables a day.

4) Personal Well-being

The Fit for Life initiative keeps employees well informed about the many lifestyle changes they can make to improve their health and well-being. Health services available to employees include:

- Lifestyle medicals including checks on height, weight, urine, blood pressure, pulse and cholesterol
- Access to smoking cessation workshops

Outside of the UK we've also launched 32 Employee Health and Wellbeing programmes ranging from healthy choice menus and to subsidized gymnasiums and bicycles for staff. In Greece for example an 'Active Living Scheme' has upgraded employee sports facilities providing football, basketball games and dance classes.

V.5 BUILDING OVERWEIGHT AND OBESITY PREVENTION AND TREATMENT INTO HEALTH SERVICES

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

Not within our expertise.

V.6 ADDRESSING THE OBESOGENIC ENVIRONMENT

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

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

Not within our expertise.

V.7 SOCIO-ECONOMIC INEQUALITIES

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

Measures and messages to promote healthy diets and physical activity will have different impact on different social groups these will not neatly delineate by socioeconomic status, nor should they be designed to do so.

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

There should be more research undertaken into the health needs of socially deprived groups. It will also be necessary to address the food intake of people with more specialised dietary needs (such as food allergies/intolerances) as well as socioeconomic needs. We welcome the Low Income Diet and Nutrition Survey being undertaken by UK's FSA which aims to provide additional data in this area and to inform subsequent Government policy.

V.8 Fostering and integrated and comprehensive approach towards the promotion of healthy diets and physical activity

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

Which role at national and at Community level?

Consumers need to be aware of what constitutes a balanced diet, as informed choice can create demand, to which industry can respond.

Policy initiatives should be taken forward holistically, based on social, environmental and economic factors. To be effective, any such strategy requires consistent, positive messages in the context of the whole diet, rather than single issues. Government should facilitate co-operation with all relevant stakeholders.

V.9 RECOMMENDATIONS FOR NUTRIENT INTAKES AND FOR DEVELOPMENT OF FOOD-BASED DIETARY GUIDELINES

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 flexible so that they can be adapted to the differing needs of local communities. A "Community" set of guidelines cannot be appropriate. However, a simple scheme framework that emphasises balancing diets and taking enough physical activity, such as the US pyramid model, can be used to promote balanced lifestyles.

A model such as this allows foods from all cultures to be slotted into the various segments. The basis of a balanced diet remains constant across cultures but the foods that make up the diets will differ with cultures. In addition, the specific food advice given must reflect the particular diet-related health problems of each community. No single food contains all the nutrients needed for good health; consumption of a wide variety of foods each day is important. And few foods are equally acceptable to all cultures. A flexible framework will allow food-based advice to be tailored to the various local diet-related problems of individual communities.

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

Positive messages work best. People do not respond to being 'preached at' or given negative messages. In addition, serious consideration needs to be given first to the necessity of meeting all these (somewhat arbitrary) targets precisely and simultaneously.

How can dietary guidelines be communicated to consumers?

Pictorial guides translate nutrient recommendations into guidance for food choice by providing consistent visual information about what constitutes a healthy diet. A food guide that is relevant and recognised by individual communities may have some positive influence in changing eating habits. See V8 above.

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

As described above we have significant concerns with the UK Food Standard's Agency's profiling model, or indeed the extent any similar model which attempts to distil a product's nutrient composition into a single score, can help provide a sound scientific basis for the comparison of the nutrient content of foods. We are unable to support such as system as we believe that:

1. It is scientifically flawed:

- It is not based on products as they are consumed: this means that many breakfast cereals are classified as "unhealthy" and thus could be subject to marketing restrictions. Had they been classified on the basis of adding low fat milk, they would appear in the "healthy" category.
- It is not based on portion size, nor frequency of consumption: as the model only classifies a product per 100g, taking no account of portion size, a pizza therefore is seen as "more healthy" than raisins; French fries appear "more healthy" than oatcakes; a Quarter Pounder with cheese is better for you than Bran Flakes or Porridge.
- Micronutrients are not included: although recent dietary surveys have indicated that many children's diets are deficient in key micronutrients such as calcium and iron, the model no longer includes micronutrients
 - 2. *It seems to be based on pre-conceptions*: it is evident that the thresholds were chosen arbitrarily so that foods could be fitted into certain categories: starting from a subjective list of "good" and "bad" foods, it moves on to devise a points scoring system against the original list.
 - 3. *It is potentially misleading to consumers*: as recent press reports show, there are signs that the concept could be misused and applied more widely to dietary choice with unintended, adverse consequences for consumers, for example, by choosing a diet solely consisting of "more healthy" products.
 - 4. *It stifles innovation*: the model does not recognise the many current innovations undertaken by the food industry that attempt to build a better balance of ingredients within a product category. Lower fat chocolate, for example, would still be in the "high" category, thereby reducing the incentive

to innovate.

5. *It is a disproportionate policy response* to concerns around advertising: along with the wider industry, Cadbury Schweppes is striving to make a positive contribution to addressing consumer health concerns. We have introduced a global marketing code of practice with specific reference to children and Cadbury Trebor Bassett in the UK has not placed advertising during children's TV programmes of any age since 2001. Industry is committed to tightening the broadcast code, however any restrictions should remain proportionate.

In the European context no such model can credibly address at the same time all the various issues that may occur in populations as diverse as the EU: obesity and underweight; diseases and risk factors such as heart disease or blood pressure; dietary imbalances such as low fruit and vegetable intake; and take account of the diet. Simplistically according a particular "score" to individual foods is unhelpful and misleading to consumers.

V.10 COOPERATION BEYOND THE EUROPEAN UNION

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?

Conversations at a technical level with scientists in other parts of the world will add to the knowledge base on which more successful approaches may be based. We support the EU Platform's transatlantic dialogue with the US in order to seek best practice.

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?

There is a need to look more at what affects people's practice and behaviour, i.e. the drivers of and barriers to change. Reversing the causes is not the only way to deal with the issue and interventions can involve taking positive action, for example the introduction of fluoride toothpaste has done far more to prevent dental caries than persuading people not to snack between meals or avoid sugar. There also needs to be a resolution of the debate as to the extent to which intervention aimed at changing people's lifestyles is merited, given the present imperfect state of evidence and the fundamental commitment of the Community to personal freedoms.

Which of the issues addressed in the present Green paper should receive

first priority, and which may be considered less pressing?

Unbiased education and information are the top priorities.

These should be focussed on how to eat a balanced diet while dispelling the many popular but misleading myths about food and diet.

Choosing a healthy lifestyle and diet should be made as easy as possible.

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