

Written evidence submitted Monster Energy Company (END0020)

Monster Energy Company (Monster) appreciates the opportunity to provide to the Science and Technology Committee (STC) its comments on the safety and marketing of energy drinks, including for adolescents. Monster agrees that regulations concerning the sale of food and beverages should be grounded in the expert scientific assessments of authoritative public health agencies. Sound science should guide decisions on safety. Monster looks forward to the STC objectively evaluating the science on the issues presented in the Terms of Reference, considering the decades of available research on the safety of energy drinks, their ingredients, and their patterns of consumption.

Energy drinks have been marketed worldwide for more than 30 years. In that time, more than 100 billion energy drinks have been sold and safely consumed. Nothing about them is new. Over the years, robust scientific evidence has repeatedly confirmed that energy drinks and their ingredients are safe. For example, the safety of caffeine and other common ingredients in energy drinks is supported by an overwhelming body of scientific literature published by reputable independent parties. Public health authorities in countries with the highest regulatory standards in Europe, North America, and elsewhere have scrutinized and monitored energy drinks for decades. Informed by science, they have found that energy drinks and their ingredients are safe, and energy drinks are not consumed excessively, including by adolescents.

Monster is one of the world's leading energy drink companies.¹ Since 2002, more than 23 billion cans of Monster Energy® drinks have been sold and safely consumed in over 130 countries and territories around the world. In these comments below, Monster is responding to issues most relevant for an energy drink brand owner.

There are many misconceptions about energy drinks. Specifically, to support the STC's inquiry, Monster offers the following facts:

1. **Mainstream energy drinks like Monster Energy are not particularly high in caffeine and do not contribute significant amounts of caffeine to the diets of children and adolescents.** For example, brewed coffees from high street coffee chains, including the two leading brands in the UK, Costa Coffee and Starbucks, contain nearly twice as much caffeine as energy drinks. Further, UK adolescents get *four times* as much caffeine from tea and *three times* as much caffeine from colas as from energy drinks.²
2. **Monster does not market to children, a commitment shared by the industry.** Monster considers the primary target demographic of its consumers to be adults 18-to-34 years old and its secondary target demographic to be adults 35-to-44 years old

¹ Monster's energy drink brands include Monster Energy® and Relentless®, among others.

² See, e.g., EFSA, *Scientific Opinion on the Safety of Caffeine*, 13(5) EFSA J. 1, 107 (2015), available at <https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2015.4102> (referencing the survey NDNS-Rolling Programme Years 1-3).

(primarily males). Marketing to a younger demographic would undermine the brand image and personality that Monster has spent billions of dollars to create and develop over the past 16 years. Accordingly, Monster directs its advertising and promotional activities, including Monster's sponsorship and promotion of competitive gaming, towards older consumers. Monster does not market to children.

3. **Multiple governmental organizations, including the European Food Safety Authority (EFSA), have repeatedly evaluated and concluded that energy drinks pose no particular risk for children and adolescents.** A substantial body of scientific and medical literature demonstrates that: (1) children and adolescents experience no particular or unique safety effects from caffeine; (2) after infancy, caffeine-dose response is a function of body weight (mg/kg), not age; and (3) the rate of caffeine clearance in children and adolescents is at least that of adults. EFSA embraced these conclusions in 2015, taking into account the body of scientific literature on the safety of caffeine and energy drinks.³ The evidence since 2015 reinforces these conclusions.
4. **Energy drinks are not particularly high in sugar, and regulations already restrict the marketing of sugar-sweetened beverages.** Energy drinks contain about the same amount of sugar as standard colas and juices. Further, more than 40% of Monster's energy drink varieties in the UK are currently low- or no-sugar, and, as of June 2018, more than 60% of Monster's various energy drink varieties available in the UK will be low- or no-sugar options.

Accordingly, restrictions on the sale of energy drinks, including those proposed by some in the media, are not supported by evidence.

I. The evidence on the potential physical and mental health effects of energy drinks on children and adolescents.

1. The fear that energy drinks may have potential physical and mental health effects on children and adolescents is based on misconceptions. Contrary to celebrity statements in the media, mainstream energy drinks are not high in caffeine or sugar when compared with other common beverages. Further, they are not consumed widely by children and adolescents. Many other common beverages that are consumed widely by these groups contain comparable levels of caffeine and sugar. Finally, authoritative scientific bodies have repeatedly concluded that energy drinks are safe, including for children and adolescents.
 - A. *Mainstream energy drinks are not particularly high in caffeine, and energy drinks do not contribute significant caffeine to the diets of children and adolescents.*
2. Opponents of energy drinks often cite the perception that they are high in caffeine as a potential risk. In fact, mainstream energy drinks—particularly when compared to other sources of caffeine such as coffee—are not high in caffeine. Moreover, caffeine intake has not increased since energy drinks became available, due to apparent substitution of caffeine sources.⁴

³ See, e.g., EFSA, *Scientific Opinion on the Safety of Caffeine*, 13(5) EFSA J. 1, 5, 46-47 (2015), available at <https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2015.4102>.

⁴ See, e.g., N. Tran et al., *Trends and Patterns of Caffeine Consumption Among US Teenagers and Young Adults, NHANES 2003-2012*, 94 FOOD & CHEM. TOXICOLOGY 227, 239 (2016), available at

3. A 500-ml mainstream energy drink, like Monster Energy, has up to 160 mg of caffeine (certain varieties have lower levels) from all sources. In contrast, coffee drinks from Costa Coffee, the most popular coffee shop chain in the UK, provide far more caffeine. Medium-sized (~400 ml) popular Costa coffees, e.g., Americanos, cappuccino, and flavored coffees, fall around 280 mg of caffeine per serving. Large-sized versions (~500 ml) typically have 370 mg.⁵ Starbucks, the second most popular coffee shop chain in the UK, has similar levels of caffeine: a medium or “grande” (~473 ml) Starbucks brewed coffee has 320-330 mg caffeine, and a large or “venti” (~592 ml) has 400-415 mg.⁶ Coffee shop coffees have roughly twice the amount of caffeine—total quantity and concentration—as mainstream energy drinks like Monster Energy.
4. Teas range from no caffeine for herbal teas to 100 mg or more caffeine per 500-ml for certain teas. For black tea, for example, 500 ml (approximately two cups) typically contains 88.8 mg of caffeine, though it can have much higher levels depending on the brand of tea and how long it is steeped.⁷ Teas sold in coffee shops (e.g., Starbucks Chai Latte) or in bottles often contain 90 mg of caffeine or more in a 473 ml serving.⁸ Soft drinks too range from 34 to 100 mg of caffeine per serving.⁹ A standard 500-ml bottle of one of the classic brands of soft drinks contains about 53.5 mg of caffeine.¹⁰
5. The following chart shows the relative proportion of caffeine in some of these common beverages:

<https://www.sciencedirect.com/science/article/pii/S0278691516301879>.

⁵ Caffeine Informer, Costa Coffee, <https://www.caffeineinformer.com/caffeine-content/costa-coffee> (last visited Apr. 5, 2018).

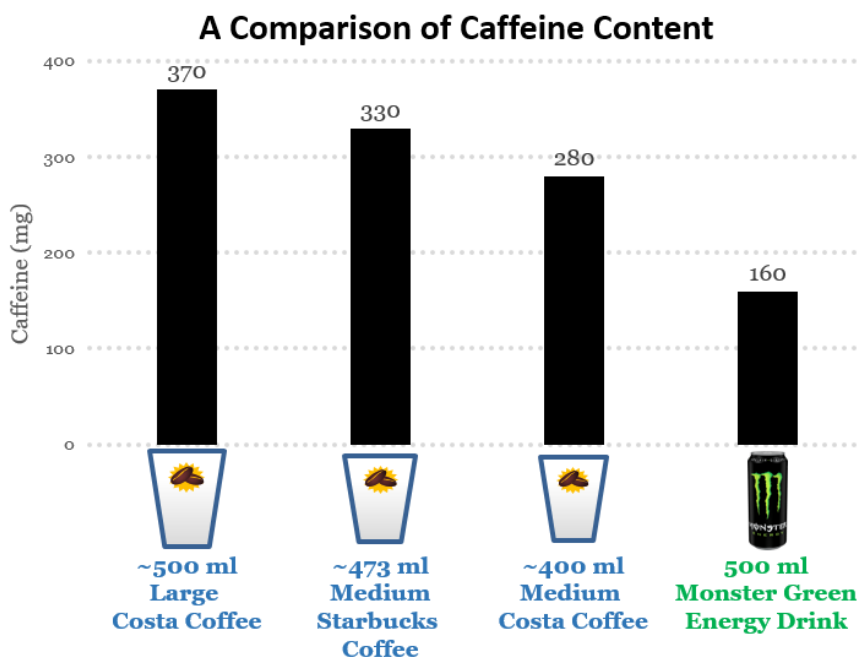
⁶ Caffeine Informer, Starbucks Coffee, <https://www.caffeineinformer.com/caffeine-content/starbucks-grande-coffee> (last visited Apr. 5, 2018). As Caffeine Informer notes, caffeine values in coffee can vary enormously, and Starbucks lists different caffeine amounts in different countries.

⁷ Caffeine Informer, Black Tea, <https://www.caffeineinformer.com/caffeine-content/tea-brewed?> (last visited Apr. 5, 2018). In the United States, a “cup” is equal to 240 ml. In many other countries, a “cup” is 250 ml.

⁸ Caffeine Informer, Caffeine Content of Drinks, <https://www.caffeineinformer.com/the-caffeine-database> (last visited Apr. 5, 2018).

⁹ *Id.*

¹⁰ Caffeine Informer, Pepsi Cola, <https://www.caffeineinformer.com/caffeine-content/pepsi-cola?> (last visited Apr. 5, 2018).

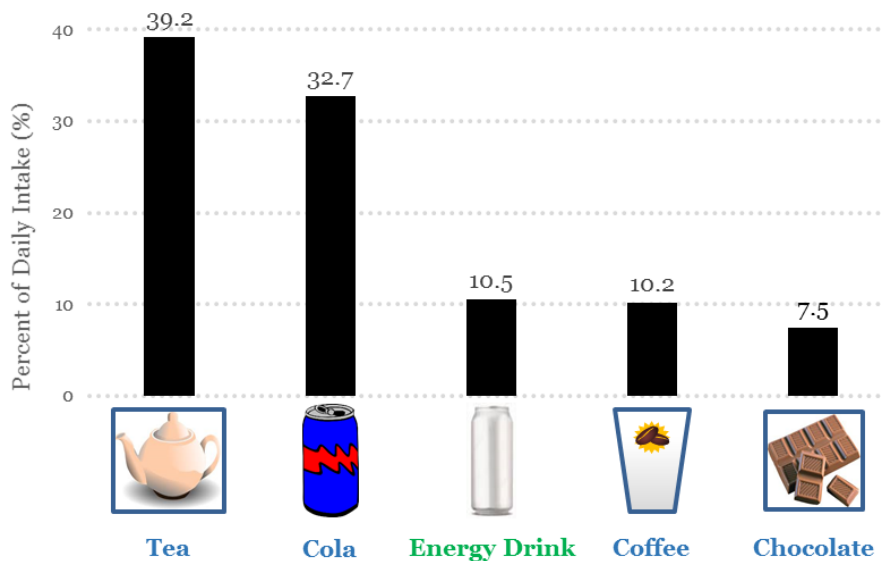


6. In addition, manufacturers of energy drinks can control the caffeine in their products. For example, Monster Energy drink varieties in the UK are formulated to contain up to 32 mg of caffeine per 100 ml (depending on variety), as are many other energy drinks. In teas and coffees, by contrast, caffeine content can vary widely. For example, one study found that the caffeine content of one specific coffee (Starbucks Breakfast Blend) at a single coffee shop varied by hundreds of milligrams (from 259 to 564 mg in a 473 ml cup, i.e., from 55 mg to 119 mg caffeine per 100 ml) over the course of six consecutive days.¹¹
7. There is also a significant misconception that children and adolescents get most of their caffeine from energy drinks. UK adolescents (10 to < 18 years) consume *four times* as much caffeine from tea, *three times* as much caffeine from colas, and about the same amount of caffeine from coffee, as from energy drinks.¹² These data are illustrated in the following chart:

¹¹ R.R. McCusker et al., *Caffeine Content of Specialty Coffees*, 27 J. Analytical Toxicology 520, 522 (2003), available at <http://pkdiet.com/pdf/CaffeineSpecialtyCoffee.pdf>.

¹² See, e.g., EFSA, *Scientific Opinion on the Safety of Caffeine*, 13(5) EFSA J. 1,107 (2015), available at <https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2015.4102> (referencing the survey NDNS-Rolling Programme Years 1-3).

A Comparison of Daily Caffeine Intake for UK Adolescents



8. Only a small proportion of children and adolescents consume energy drinks regularly. More than 30% of UK adolescents do not consume energy drinks at all.¹³ While an EFSA consumption study found that 69% of UK adolescents (ages 10 to < 18 years) and 68% of European adolescents were “consumers” of energy drinks, “consumers” was broadly defined as those who had consumed at least one energy drink in an entire year.¹⁴ Thus, the use of such data to suggest that all UK and European adolescents are regular consumers of energy drinks would be misleading at best.
9. Even among energy drink consumers, energy drinks constitute a small amount of their total caffeine intake. Adolescent energy drink consumers in the UK drank an average of approximately 750 ml per week, or one-and-a-half 500-ml cans per week.¹⁵ Just 32.1 mg, or 16.9%, of their total average daily caffeine intake came from energy drinks.¹⁶
10. Because energy drinks contain less caffeine than a similarly sized coffee shop coffee and contribute less caffeine to the diets of adolescents than tea and soft drinks, there are no grounds to single out energy drinks for an age restriction or other regulation.

¹³ S. Zucconi et al., *Gathering Consumption Data on Specific Consumer Groups of Energy Drinks*, 10 EFSA J. 1, 91 (2013), available at <https://efsa.onlinelibrary.wiley.com/doi/abs/10.2903/sp.efsa.2013.EN-394>.

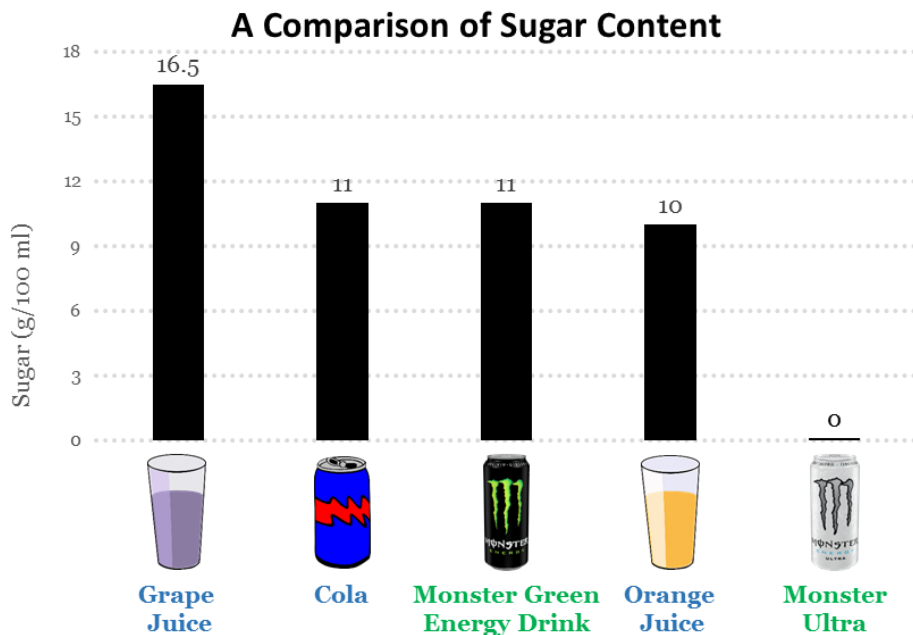
¹⁴ S. Zucconi et al., *Gathering Consumption Data on Specific Consumer Groups of Energy Drinks*, 10 EFSA J. 1, 2 n.4, 91, 154 (2013), available at <https://efsa.onlinelibrary.wiley.com/doi/abs/10.2903/sp.efsa.2013.EN-394>.

¹⁵ S. Zucconi et al., *Gathering Consumption Data on Specific Consumer Groups of Energy Drinks*, 10 EFSA J. 1, 154 (2013), available at <https://efsa.onlinelibrary.wiley.com/doi/abs/10.2903/sp.efsa.2013.EN-394> (reporting that UK adolescent energy drink consumers drank an average of 3.1 liters of energy drinks per month, which equals approximately 750 ml per week).

¹⁶ S. Zucconi et al., *Gathering Consumption Data on Specific Consumer Groups of Energy Drinks*, 10 EFSA J. 1, 110, 113 (2013) available at <https://efsa.onlinelibrary.wiley.com/doi/abs/10.2903/sp.efsa.2013.EN-394>.

B. *Energy drinks are not particularly high in sugar, and regulations already restrict the marketing of sugar-sweetened beverages.*

11. Mainstream energy drinks are not particularly high in sugar, and typically contain about the same amount of sugar as colas and juices, while low- and no-sugar energy drinks contain significantly less or no sugar. A Monster Energy (Green) energy drink contains 11 g sugar/100 ml, which is about the same amount of sugar found in standard colas (11 g/100 ml) and juices (10 g/100 ml).¹⁷ There are also numerous no-sugar energy drinks and low-sugar energy drinks that contain less than 4.8 g sugar/100 ml. For example, more than 40% of Monster's energy drink varieties in the UK are currently low- or no-sugar, and, as of June 2018, more than 60% of Monster's various energy drink varieties available in the UK will be low- or no-sugar options. Further, adolescents drink far more cola and juice than they drink energy drinks, making the former much more significant sources of sugar consumption.¹⁸
12. The chart below shows the relative proportion of sugar found in colas, juices, and certain Monster energy drinks. Monster Ultra, which Jamie Oliver presented as an example of a high-sugar drink, is actually a no-sugar drink:



13. Advertising restrictions in the UK applicable to sugar-sweetened beverages do not discriminate between energy drinks and other beverages. For foods with certain levels of sugar, including some energy drinks, advertising in any media where those under the age of 16 make up over 25% of the audience is prohibited.¹⁹

¹⁷ See Pepsi, Pepsi, <https://www.pepsi.co.uk/products/pepsi>; Tropicana, Sugars & Juice, <http://www.tropicana.co.uk/faq>.

¹⁸ See, e.g., EFSA, *Scientific Opinion on the Safety of Caffeine*, 13(5) EFSA J. 1, 106 (2015), available at <https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2015.4102> (referencing the survey NDNS-Rolling Programme Years 1-3).

¹⁹ [The Broadcast Code](#) and [The Non-broadcast Code](#) of the UK Advertising Standards Authority.

C. *EFSA, and other scientific bodies, have evaluated repeatedly the safety of energy drinks, including the potential physical and mental health effects on children and adolescents, and have repeatedly concluded that the products are safe.*

14. The safety of the ingredients in energy drinks, alone and in combination, has been well established. The ingredients in mainstream energy drinks are found in a broad range of food products with a long history of safe consumption. Most of the attention about the safety of energy drinks focuses on caffeine. Numerous scientific studies, scientific bodies, and government health agencies have concluded that energy drinks, including the caffeine they contain, are safe.
15. There is a misconception that energy drinks contain many stimulants. This is not true. Caffeine (including caffeine from guarana) is the only stimulant in mainstream energy drinks like Monster Energy. Mainstream energy drinks may include other ingredients such as taurine, D-glucurono- γ -lactone, ginseng extract, B vitamins, and sweeteners. These are not stimulants. They are found in a broad range of food products that have a long history of safe consumption. For example, taurine is a common amino acid found in many foods, including infant formula.²⁰
16. Caffeine is one of the longest-used and best-studied food ingredients in the world. Found in common foods such as coffee, tea, and chocolate, caffeine has been a part of the human diet for millennia. In addition, extensive studies have established its safety. Regardless of whether caffeine is added to a product (such as in energy drinks and colas) or naturally occurring (such as in tea, coffee, or chocolate), and whether it is consumed hot or cold, rapidly or slowly, or from a carbonated or non-carbonated beverage, there is no chemical difference, and studies have shown the effects are the same.²¹
17. *Safety of caffeine in children and adolescents.* Global health authorities, such as EFSA and the U.S. Food and Drug Administration (FDA), have recognized that children and adolescents are not at a unique risk from caffeine consumption.²² Evaluating this issue in 2015, after extensive study, EFSA concluded that the substantial body of scientific and medical literature demonstrates that: (1) children and adolescents experience no particular or unique safety effects from caffeine; (2) after infancy, caffeine-dose response is a function of body weight (mg/kg), not age; (3) the rate of caffeine clearance in children is at least that of adults; and (4) any acute behavioral or other effects that children and adolescents may experience from caffeine are the same as those experienced by adults.²³
18. EFSA concluded that its single-dose of no concern for adults (3 mg/kg of body weight) also may apply to children and adolescents. EFSA expressly recognized that this is a “rather conservative”

²⁰ See, e.g., Russell W. Chesney et al., Abstract, *The Role of Taurine in Infant Nutrition*, 442 ADVANCES IN EXPERIMENTAL MEDICINE & BIOLOGY 463-76 (1998), <https://www.ncbi.nlm.nih.gov/pubmed/9635063>.

²¹ J.R. White et al., *Pharmacokinetic analysis and comparison of caffeine administered rapidly or slowly in coffee chilled or hot versus chilled energy drink in healthy young adults*, 54 Clin. Toxicol. 308, 312 (2016), available at <https://www.tandfonline.com/doi/full/10.3109/15563650.2016.1146740>.

²² See, e.g., 21 C.F.R. 340.50.

²³ See EFSA, *Scientific Opinion on the Safety of Caffeine*, 13(5) EFSA J. 1, 5, 46-47, 70-71 (2015), available at <https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2015.4102>.

figure.²⁴ The UK's Food Standards Agency, on behalf of the Committee on Toxicity of Chemicals in Food, Consumer Products and the Environment, agreed with this approach.²⁵

19. *Safety of other ingredients in energy drinks.* EFSA has repeatedly confirmed the safety of energy drink ingredients other than caffeine, namely taurine and D-glucurono- γ -lactone, including in 2009 and 2015. In 2009, EFSA found no basis to suspect that the key ingredients in energy drinks interact negatively with each other or enhance the effects of caffeine.²⁶ EFSA concluded that the exposure to these ingredients at the levels presently used in mainstream energy drinks is not a safety concern, and that additive interactions between taurine and caffeine on diuretic effects are unlikely.²⁷ EFSA reconfirmed these findings in 2015, noting that it is unlikely that taurine and D-glucurono- γ -lactone interact adversely with, or enhance the effects of, caffeine with respect to its effects on the cardiovascular system, the central nervous system, or hydration status in the body.²⁸

II. How marketing of energy drinks affects consumption, including for example links to 'gaming.'

A. *Monster does not market to children, a commitment shared by the industry as a whole.*

20. Monster markets its products to the demographics it wants to purchase its products, which is a primary target demographic of adults 18-to-34 years old and a secondary target demographic of adults 35-to-44 years old (primarily males). Monster does not focus its marketing initiatives on younger demographics. To do so would undermine the credibility of the brand image in the eyes of its target consumers. It has long been Monster's policy not to sample its products at primary and secondary schools. Instead, Monster samples at universities and at events predominantly attended by adults. Monster does not advertise on television, radio, or print media where the target audience is predominantly children.
21. Like Monster, the energy drink industry generally is committed to avoiding marketing to children. Monster, as a U.S.-based company, is a member of the American Beverage Association (ABA) and voluntarily follows the ABA Guidance for the Responsible Labeling and Marketing of Energy Drinks in the U.S., which includes a commitment not to market energy drinks to children.²⁹

²⁴ See EFSA, *Scientific Opinion on the Safety of Caffeine*, 13(5) EFSA J. 1, 70-71 (2015), available at <https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2015.4102>.

²⁵ See EFSA, *Technical Report Outcome of a public consultation on the draft Scientific Opinion of the EFSA Panel on Dietetic Products, Nutrition and Allergies (NDA) on the safety of caffeine* at 95 (2017), available at <http://onlinelibrary.wiley.com/doi/10.2903/sp.efsa.2015.EN-811/epdf> ("[FSA] Members supported EFSA's approach of extrapolating from adults to children and adolescents on a bodyweight basis, which was acceptable given the lack of direct data on toxicity in children and adolescents.").

²⁶ See EFSA, *The Use Of Taurine And D-Glucurono- γ -lactone As Constituents Of The So-Called "Energy" Drinks*, 935 EFSA J. 1, 23 (2009), <https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2009.935>.

²⁷ See EFSA, *The Use Of Taurine And D-Glucurono- γ -lactone As Constituents Of The So-Called "Energy" Drinks*, 935 EFSA J. 1, 23 (2009), <https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2009.935>.

²⁸ EFSA, *Scientific Opinion on the Safety of Caffeine*, 13(5) EFSA J. 1, 3, 16-18 (2015), available at <https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2015.4102>.

22. Monster's UK distributor, Coca-Cola European Partners (CCEP), is a member of the British Soft Drinks Association (BSDA) and distributes Monster's products in accordance with BSDA guidance for the responsible labeling and marketing of energy drinks. In the UK, Monster's marketing practices are aligned with CCEP's marketing practices. Monster also complies with advertising standards adopted by the Advertising Standards Authority, which contain specific restrictions on advertising to children that apply across the industry (e.g., advertisers must ensure that there is nothing within an ad that is addressed to, targeted at or features a child that could result in a child's physical, mental or moral harm). Energy drinks also must comply with a comprehensive body of EU regulations that govern the safety, composition, and labeling of energy drinks, as discussed in brief in Section IV.

B. Insofar as Monster markets to gamers, it markets to young adults.

23. As stated above, Monster's primary target demographic is 18-to-34-year-old adults, and its secondary target demographic is 35-to-44-year-old adults (primarily males). Monster's advertising, sponsorship, and promotional activities are focused directly at its consumers in these demographics. In fact, Monster Energy is mainly a motor sports brand, and the substantial majority of Monster's total marketing expenditures are focused on motor sport athletes and events, which athletes and events generally appeal to older, adult consumers.
24. Monster sponsors and promotes an extensive range of activities, one of which is competitive gaming (i.e., "eSports"), consistent with its targeted consumer demographics. However, its total spend in this regard is less than 2% of its overall marketing and promotional costs. Although it may not be generally well known, competitive-gaming viewers are primarily adults. Indeed, statistical data show that 86% of UK eSports viewers are 21 years old or older.³⁰

III. The extent to which drinks being carbonated affects their consumption and marketing.

25. As discussed above in Section I, the characteristics of energy drinks do not affect the way that they are consumed or how the body processes energy drink ingredients once consumed.

IV. What controls, regulation or awareness-raising are in place for energy drinks.

26. Energy drinks already are highly regulated in the UK based on a comprehensive body of EU laws that regulate their composition, labeling, and safety. For instance, like all foods and beverages, energy drinks placed on the EU market must be safe, not injurious to health, and fit for human consumption.³¹ With respect to labeling, beverages that contain more than 150 mg caffeine per liter must state: "High caffeine content. Not recommended for children or pregnant or breast-feeding women." Such beverages also must declare the amount of caffeine per 100 ml.³²

²⁹ American Beverage Association, ABA Guidance for the Responsible Labeling and Marketing of Energy Drinks, available at <https://www.energydrinkinformation.com/files/resources/2014-energy-drinks-guidance-approved-by-bod-43020c.pdf>.

³⁰ Newzoo, The UK Esports Audience 2016 (Aug. 2, 2016), <https://newzoo.com/insights/infographics/uk-esports-audience-2016/>.

³¹ Regulation (EC) No 178/2002 of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety (<http://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1516702639364&uri=CELEX:02002R0178-20140630>).

Further, energy drinks may only make health or nutrition claims that are compliant with the EU Nutrition and Health Claims Regulation.³³ Sections I and II discuss various other applicable UK laws and regulations, including the Advertising Standards Authority Codes of Practice, as well as commitments from Monster and the industry generally.

V. What further controls, regulation or awareness-raising are required, and where responsibility/accountability for that should lie.

27. All beverage companies are responsible for the safety of their products and for responsibly marketing their products.
28. Any further controls or regulation should be based on science. Current research on energy drinks, covering multiple decades, shows that no further regulation is merited at this time.

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³² Regulation (EU) No 1169/2011 of the European Parliament and of the Council of 25 October 2011 on the provision of food information to consumers, amending Regulations (EC) No 1924/2006 and (EC) No 1925/2006 of the European Parliament and of the Council, and repealing Commission Directive 87/250/EEC, Council Directive 90/496/EEC, Commission Directive 1999/10/EC, Directive 2000/13/EC of the European Parliament and of the Council, Commission Directives 2002/67/EC and 2008/5/EC and Commission Regulation (EC) No 608/2004 (<http://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1516702865950&uri=CELEX:02011R1169-20140219>).

³³ Regulation (EC) No 1924/2006 of the European Parliament and of the Council of 20 December 2006 on nutrition and health claims made on foods (<http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02006R1924-20141213&from=EN>).