



*Where Nutrition Becomes Therapy*

## Personalised Nutrition: Therapeutic Potential & Regulatory Challenges

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*Global Head Regulatory Advocacy*

**Personalised nutrition for better health -  
targeting the microbiome**

*OECD EWI Workshop, Brussels, October 10-11, 2017*

# What next?

- **Nutrition & ‘Healthy Consumer-Patient’ Continuum**
- **Personalised Nutrition**
  - Untapped, targeted potential for health and disease management
- **Gut Microbiome**
  - Complex, not a fad, a partner re: healthcare solutions
- **Regulatory Considerations**
  - Innovation & investment ‘friendly’, with the consumer & patient in mind
- **Future of Personalised Nutrition**
  - Already here // still plenty to do & more future to come

# How much can Nutrition do for Health & Disease? To what extent - can we personalise nutrition? is the regulatory framework fit-for-purpose?

## Challenges & Paradigms Shifts in Health & Healthcare

- Societal issues: aging population / overweight / rare & chronic diseases & malnutrition / costs

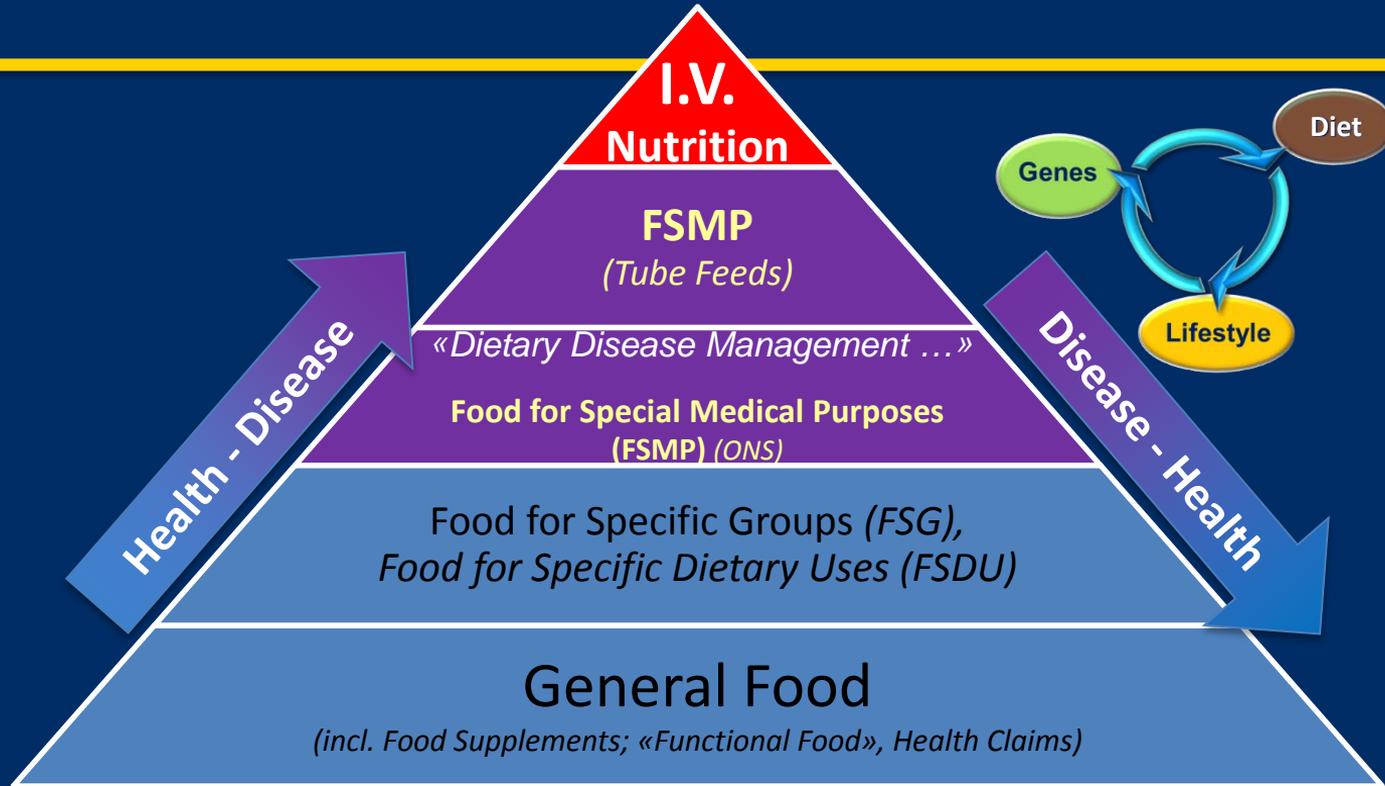
## Health & Therapeutic Solution Potential → encompasses Microbiome, Nutrition & Diagnostics

- New science (incl. microbiome) & technology («omics», IVD, apps ...) → faster; increased complexity
- Nutrition potential for health / as disease prevention / disease-related malnutrition / dietary disease management/ even (symptomatic) «therapy»
- Personalisation («targeted») → none of us is in the «average» // yet no «over-personalization» either

## Ways Forward – Balanced Evidence & Multistakeholder Dialogue → Efficient Healthcare «Logistics»

- Regulatory Framework interpreted/enforced 'fit for purpose' → ROI; acceptable «uncertainty»
  1. Product development: reduce unnecessary technological barriers →  
Nutrients: quality/safety, not disease based (CMC: analytics, GMP, stability, ...; global harmonization)
  2. Broad based evidence (RCTs, RWE, «citizen research»...), post-marketing shift when possible
  3. Balance precautionary approach vs. innovation benefits

# Healthy Consumer ↔ Patient Continuum



# PERSONALISED NUTRITION



# Who benefits from Targeted/ Personalised Nutrition?

- Physiological needs of an individual may differ from group needs
- Personalisation requires to meet measured individual nutrient needs
- Personalised nutrition with a demonstrated potential to improve health, wellbeing, patient care.



# Personalisation everywhere?

- Personalised & customised approaches are big trends, a potential “tool” for increased customer loyalty & engagement
- Personalised (or “targeted”) Nutrition: Reality or Fiction?
  - Selected micronutrients adjusted per individual, eating habits, differentiation by gender, age/life situation (pregnancy, kids, 50+), gut microbiome/genome/ biomarker analysis-based nutrient cocktails
  - Healthcare professionals adapt nutrition care to their patient needs

Support eye health with Lutemax<sup>®</sup> 2020  
 The only ingredient supported by the B.L.U.E. Study

What's your  
 (Blue Light User)

SPECIAL EDITION: PERSONALIZED NUTRITION

## With interest in wellbeing and longevity on the rise, the time has come for personalized nutrition, say experts

By Stephen Daniels

06-Sep-2017 - Last updated on 08-Sep-2017 at 09:54 GMT



## Personalized nutrition startup Vitamin Packs highlights 'trillions' of combination possibilities

By Adi Menayang

13-Jul-2017 - Last updated on 26-Jul-2017 at 14:17 GMT



## PERSONALIZATION FROM TEST TO TABLE

Habit marries our passion for food with the science of you to bring you the world's most complete personalized nutrition solution.

HOW IT WORKS



### HABIT NUTRITION TEST KIT

Test your metabolism and nutrition needs from the comfort of your own home.



### TEST RESULTS & NUTRITION PLAN

After you send in your samples, we provide you with a digital dashboard of your biological results and personalized nutrition tools and guidance.



### HABIT NUTRITION COACHING

Registered Dietitians, Nutritionists and behavior change experts help you reach your goals with strategies and support tailored just for you.



### PERSONALIZED FRESH MEALS

Our chefs craft delicious meals personalized to your unique biology. Order up a delivery plan that matches your needs and let us do the rest.

# The Future for Medical Foods (*S. Bigelow, 2013*)

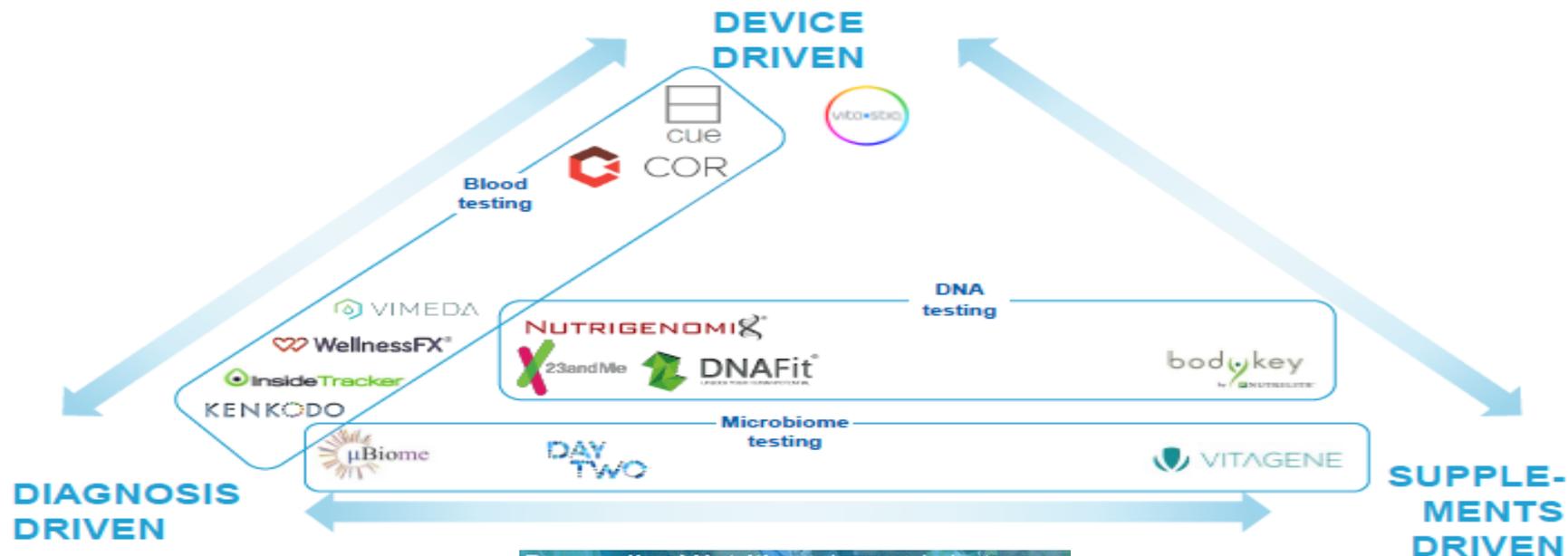
**Genomic scientific findings on genetic polymorphisms** related to disposition of dietary components/nutrients have been shown to have an effect on the risk, progression and clinical outcome for many diseases. For each of the diseases listed below, medical foods can be developed to address the biological effects of each nutrient-related human polymorphism.

- **Vitamin D receptor.** Vitamin D can be viewed as a master hormone that exerts its metabolic action via a cellular receptor located in most human tissues. While most dietary sources of vitamin D may be found in dairy products, certain populations may not obtain adequate vitamin D to meet their nutritional requirements (Norman and Henry 2012). Its classical nutrition-related actions involve calcium mobilization, especially its deposition to bone tissue, whereas more recent findings involve skeletal muscle and immune system development and maintenance (Girgis et al. 2013, Prietl et al. 2013). Human polymorphisms of the vitamin D receptor affect the ability of vitamin D to exert its biological action, which has been found to be associated with the risk, progression and/or clinical outcome of several diseases including diabetes, rheumatoid arthritis, polycystic ovarian syndrome (PCOS), and ovarian and oral cavity cancers (Gezen-Ak et al. 2012, Hitchon et al. 2012, Larcombe et al. 2012, Levin et al. 2012, Milner 2012, Yokoyama et al. 2012).
- **Folate MTHFR.** Two relatively common human polymorphisms related to dietary folate (vitamin B9) disposition have been characterized for the methylene-tetrahydrofolate reductase (MTHFR) and methionine synthase reductase (MFRR) genes, designated as C677T and A2756G, respectively, which can result in elevated blood levels of homocysteine, a known risk factor for hypertension and vascular disease (Bailey and Caudill 2012). Associations have been characterized between human MTHFR polymorphisms and the risk, progression and/or clinical outcomes for numerous diseases including depression, mild cognitive impairment, heart disease including myocardial infarctions, and spina bifida (Ma et al. 1996, Morita et al. 1997, Schwartz et al. 1997, Lucock et al. 2000, Yates and Lucock 2003, Milner 2012, Smith et al. 2010, Wilson et al. 2013).
- **Dietary fatty acid utilization.** Human polymorphisms affecting energy utilization of dietary polyunsaturated and saturated fatty acids include the genes that code for CALPAIN-10 (Ca-mediated protease), PPAR receptor (peroxisome proliferator-activated receptor), INK4 (a tumor suppressor), lipoprotein lipase, fatty acid desaturase-1 and -2, and endothelial nitric oxide synthase. These human polymorphisms are associated with the progression to metabolic syndrome (a condition that often leads to diabetes and obesity), elevated blood cholesterol levels and asthma (Bendlova et al. 2008, Perez-Rodriguez et al. 2011, Joffe et al. 2012, López-Alarcón et al. 2012, Thompson et al. 2012, Ahmed et al. 2013, Gillingham et al. 2013).
- **Human microbiome.** The microbiome is defined as the total community of microbes that inhabit the human gastrointestinal (GI) tract, of which the microbial community is responsible for aiding the digestive process. The human microbiome has been characterized by the NIH Human Microbiome Consortium in 2012 (Huttenhower et al. 2012). The genetic disposition of human microbiome has been found to be associated with the risk, progression and/or clinical outcome of many diseases including obesity, type 1 diabetes, inflammatory bowel disease, rheumatoid arthritis, muscular dystrophy, multiple sclerosis, fibromyalgia and some cancers (Aomatsu et al. 2012, Clemens 2012, Huttenhower et al. 2012). There is the potential that genetic variations in the members of the microbiome or its human host may have an effect on their interactions in respect to human disease state. Dietary probiotics in the form of cultured dairy products and prebiotic supplements provide positive effects the nature and activity of the human microbiome in respect to digestive process, immunity and perhaps obesity.

# Personalisation starts with Measuring

Some companies are on the market or are fundraising right now

**BASF**  
We create chemistry

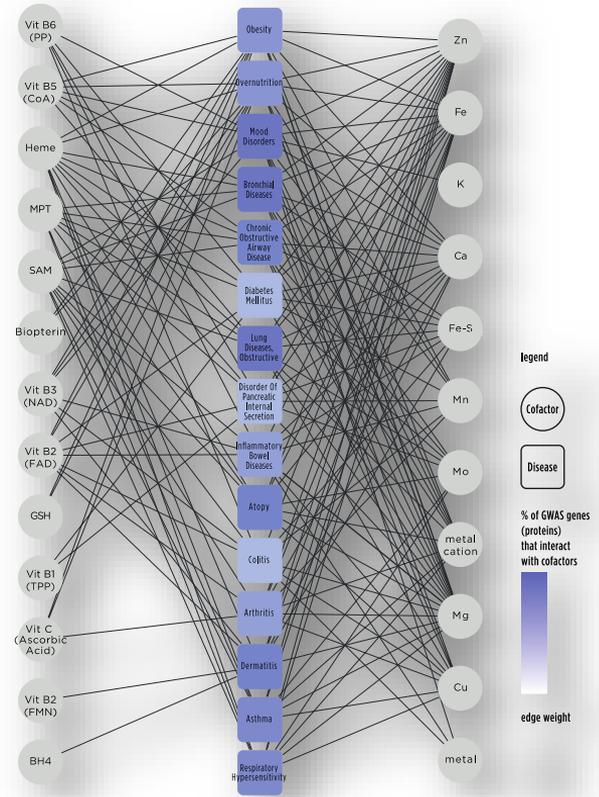
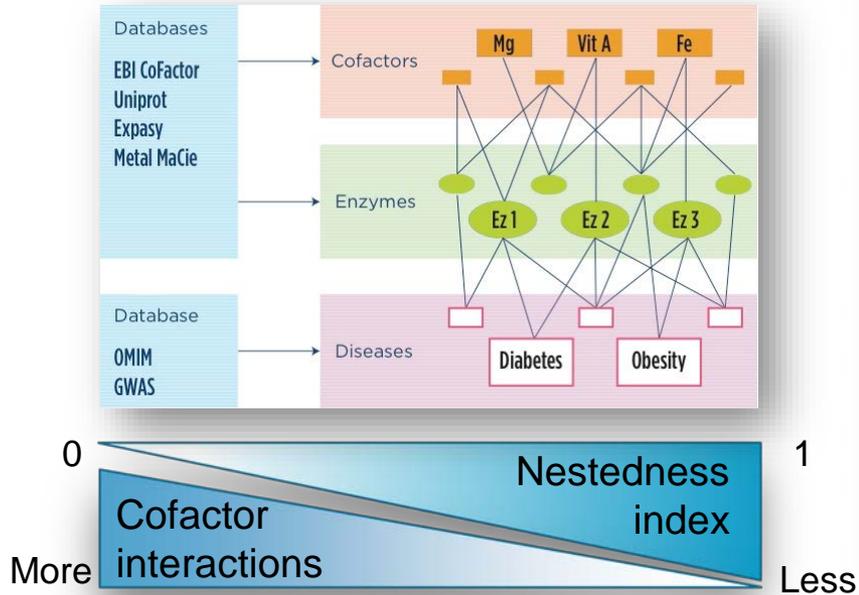


**Personalized Nutrition** – how an industry can take part in shaping the future of Nutrition

Simon Strauch, Dr. Michael de Marco, Martin Stahljans  
January 2017

# Complexity of Personalising Micronutrients?

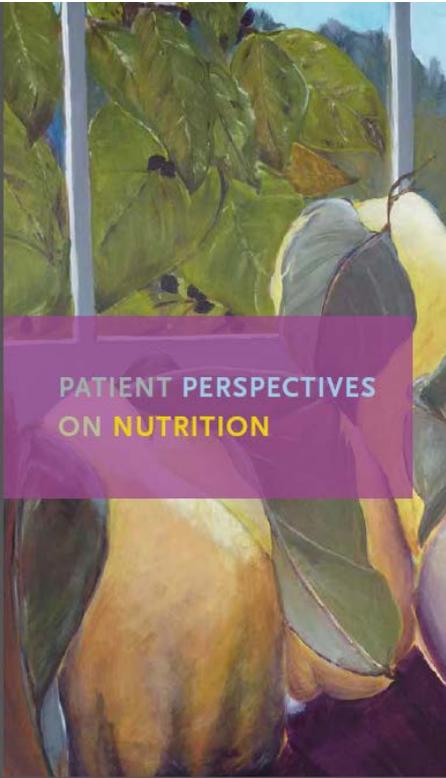
## Cofactor – Protein Interactions





# Medical Nutrition: Improving Nutritional Status / Clinical Advantage

Can be a de-facto Disease Prevention/Management/Treatment - Complementing Drugs



	Disease / Medical Condition	Clinical Benefit
<b>Nutrition as Disease-related Malnutrition Management</b>	Short Bowel Syndrome; Stroke	Lifesaving Intervention
	COPD	Increased Ventilatory Capacity
	Surgical Patients	Less Complications
	Older patients	More Active, Better quality of Life, Decreased Mortality
<b>Nutrition as Disease Management («Therapy»)</b>	Crohn's Disease	Induction of Remission
	Cow's Milk Allergy	Reduced Symptoms, Catch-up Growth
	IEMs: PKU, MSUD, FAOD, GSD	Normal Growth & Development
	Intractable Epilepsy	Less Seizures; Normal Growth & Development

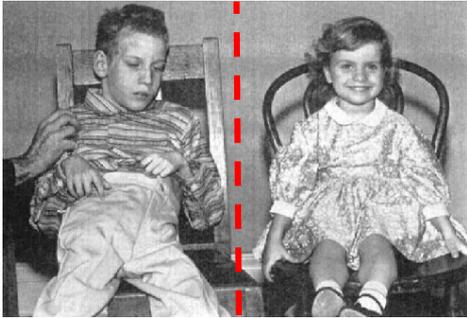
Adapted from: [http://www.eu-patient.eu/globalassets/press/pressreleases/2013-05-24\\_pr-nutrition\\_epf-egan-enha.pdf](http://www.eu-patient.eu/globalassets/press/pressreleases/2013-05-24_pr-nutrition_epf-egan-enha.pdf)

# The PKU story

## For Inborn Errors of Metabolism (IEM)

### Disease / patient need

- Inborn error of metabolism



Two siblings with PKU. Only the **sister** had been diagnosed and treated since birth

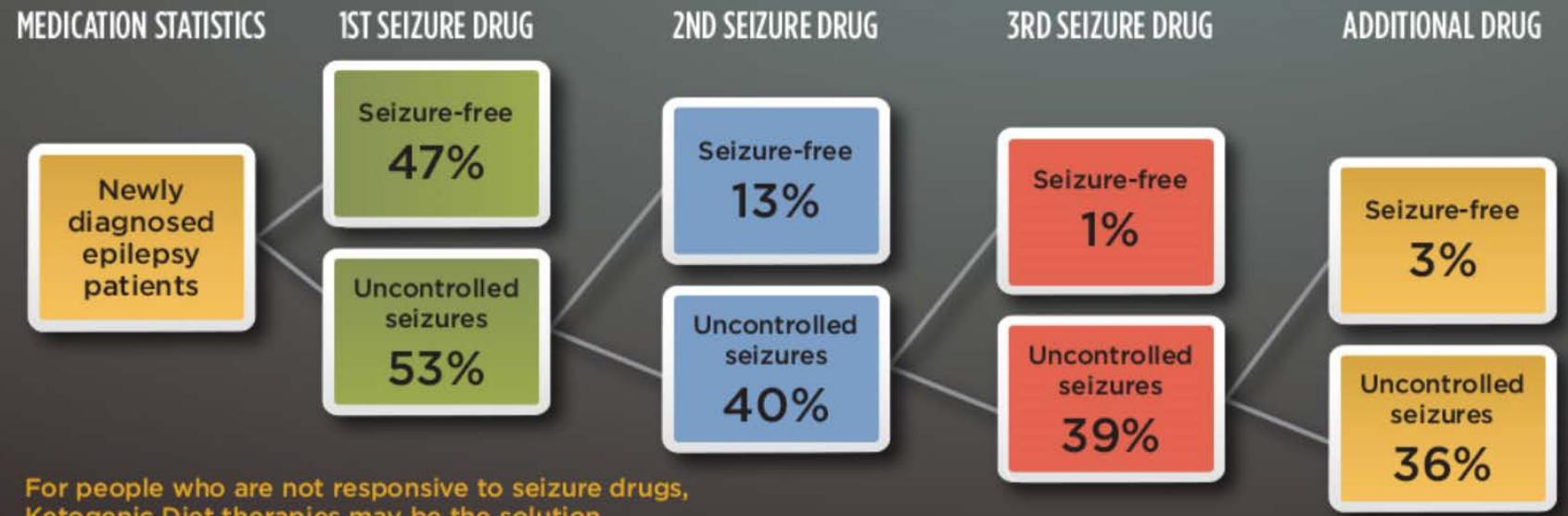
### Nutritional solution



### Clinically proven

- Nutritional therapy is the gold standard
- Vitaflo's portfolio offers “**diet for life**” solutions

# Seizure Control with Medications



For people who are not responsive to seizure drugs, Ketogenic Diet therapies may be the solution. **10-25% of people who try these therapies become seizure free.**

Source: Kwan P, Brodie MJ. *N Engl J Med.* 2000;324:314-319.

# «Intractable Epilepsy & the Value of formulated Ketogenic Diet Products»\* as Nutritional Therapy

## Ketogenic Diet: The Basics

- Traditionally started gradually in the hospital over 2-3 days, after a 24 hour fast
  - Families educated daily
- Ratio (fat: carbs and protein)
  - 4:1 more strict
  - 3:1 for infants and adolescents
- Calories and fluids measured
- Solid foods and/or formula

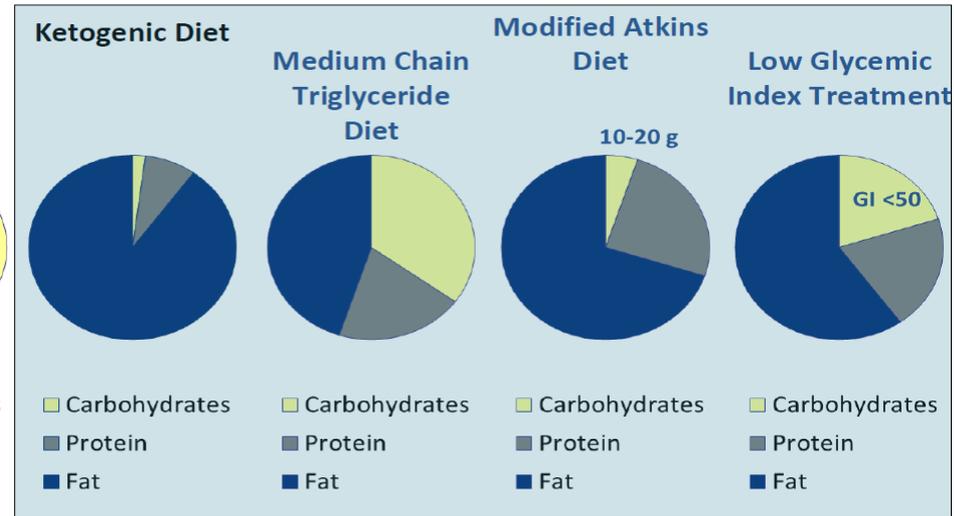


■ Carbohydrates  
■ Protein  
■ Fat

### Case Study: 17 year old female

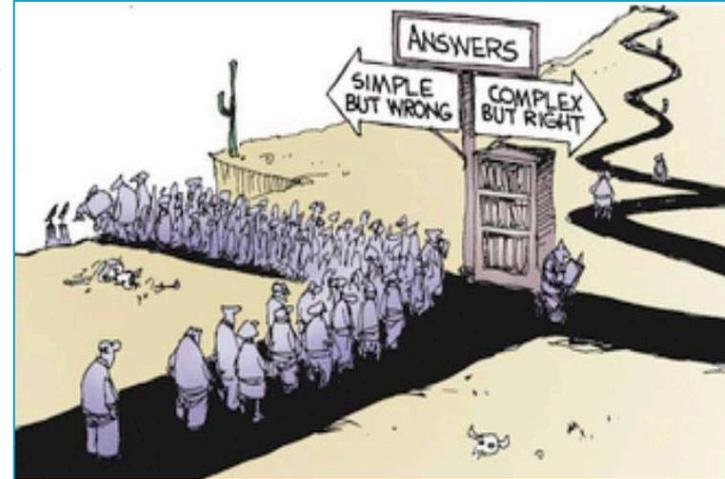
- 1 week: No change in seizures, likes the fat foods but misses rice and pasta
- 1 month: Seizures reduced 90%! (but not driving...)

## Four Ketogenic Diets



# Personalized Nutrition – A Gut Feeling

- **Nutrition is crucial in health & disease management**  
→ **Microbiome part of the solution**
  - Nutrition is safe, physiologic, nourishes (!), can be a sole or additional solution to disease prevention, related malnutrition, dietary disease management, symptomatic disease therapy
  - Use untapped nutrition potential in an adapted, «modern» way\*
- **Regulatory framework tested by a real world scenario**
  - Aging society, NCDs, healthcare costs, patient empowerment
  - Increased complexity: blurring lines between established food, drug, devices categories (FSMP, nutritional therapy, 'apps' ...)
- **We must interpret/enforce regulations in an innovation & consumer/patient friendly way**
  - Eliminate unnecessary technological hurdles (CMC; global)
  - Opportunities will be lost if no investment (ROI)\*
  - Accept a 'certain' uncertainty (IT/Big data ...)



# GUT MICROBIOME



# Innovation Engine – Critical to long-term Success

## Partnering in GI Health



## Partnering in Food Allergy



## Networking with Academia



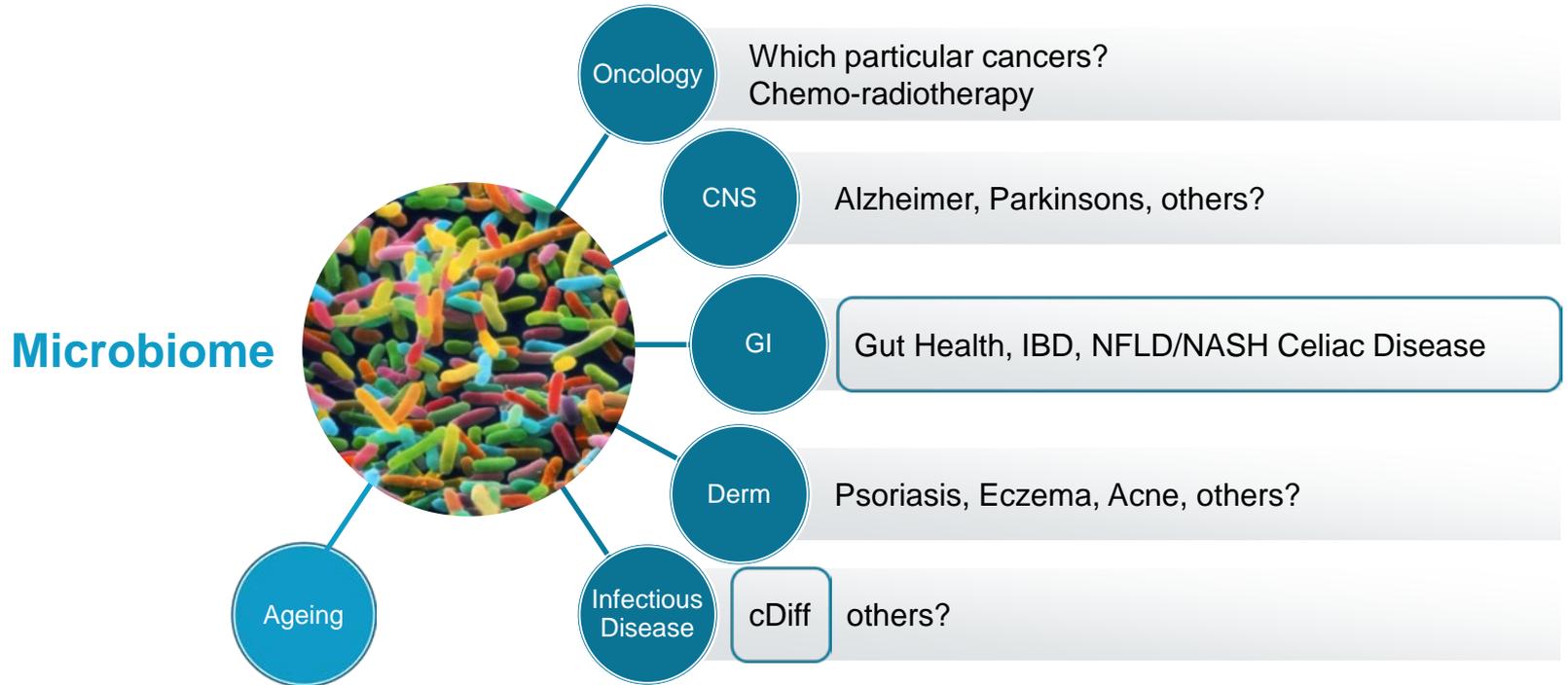
## Partnering in Brain Health / Devices



## Leveraging Venture Funds



# A broad Role of Microbiome



# Critical Path to Microbiome Modulation & Deployment in Multiple Indications

*We can influence by....*

**1** Diagnosing the microbiome  
*How do we measure microbiota status in health & disease*

*...using Differentiating Technologies*

- Metagenomic 'footprint' of microbiota in health & disease
- MetaHIT database (10 million bacterial genes)
- De-risking CTs & development plans across indication areas

**2** Replacing the Microbiome  
*Restore a healthy microbiome*

- Bacterial cultivation & spore technology
- Access to unique bioinformatic tools to generate new Ecobiotics: defined live bacterial engraftments

**3** Feed the healthy microbiome  
*Develop nutrients/molecules enhancing healthy microbiome*

- Developing nutrients/natural derived ingredients to modulate the microbiome (eg AAs, oligosaccharides, prebiotics, probiotics, lipids)

**4** Kill the unhealthy microbiome  
*Develop targeted solutions & prevent colonisation of pathogens*

- Nutrients or bacteria derived small molecules
- Antagonise attachment / metabolic activity of non-beneficial bacteria

**5** Use bacteria as delivery system  
*Select & develop live bacteria as benefit delivery system*

- Unique delivery system (eg. *L. lactis*) for biologics & small molecules
- Specific probiotics

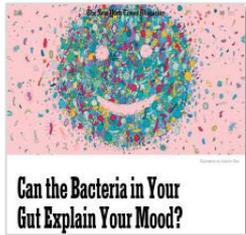
# Mastering the Microbiome... a New Health Frontier

Anxiety

Gastrointestinal  
Health

Allergy,  
Obesity/Diabetes

Probiotics (BL 999) in Anxiety Management



*Ecobiotics* in the Microbiome



IBD IBS  
Crohn's Disease  
Ulcerative Colitis

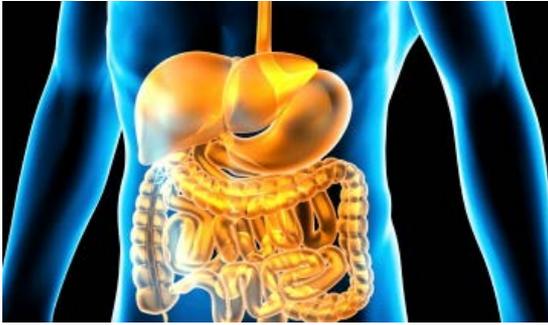


Targeted Bacteria in Inflammation  
& Immunity-related Diseases



# Building Leadership in the Microbiome Field

*Strategic investment and partnership with Seres*



- **Microbiome is a fast developing and new health frontier**
- **Exclusive agreement outside North America for Seres' novel class of microbiome therapeutics**
  - Clostridium difficile infections (CDI): SER-109, SER-262
  - Inflammatory bowel disease (IBD): SER-287, SER-301
- **Complementary relationship to support future commercialization**
- **Seres: leader in the microbiome space with most advanced pipeline**
- **Nestlé Health Science: global footprint; strong category expertise in Acute Care & GI; opportunities for co-therapeutic approaches (Dx-Rx-Nx)**

# Gut Microbiome – Healthcare Potential

- Need to address basic development issues

## Baseline Thoughts

- Patient or Microbiome? Symbiosis? Dysbiosis? «Healthy» Microbiome?
- Health & disease impact? define gaps

## Transformative Science

- Dynamics of gut microbiome: mechanism of action, physiologically relevant endpoints, individual metabolism, e.g. nutrition phenotyping to quantify “DNR” (nutritional needs)

## Quality, Safety, Efficacy

- Regulate what: Safety 1st (pathogen free)?
- Large scale production; batch consistency?
- Classify non-gut systemic microbiome effect

## Gold Standard, Precedent, Analogy, Learning?

- Pro-, Pre-, Symbiotics / Antibiotics
- 1st 1000 days, functional variability
- Access: patients', payers' views?



# Microbiome

## – A Gut Feeling

- Microbiome is a complex adaptive system → not a fad, a ‘quasi organ’ not to be viewed in isolation → a variable in every aspect of host health → the diet has a strong effect on gut microbial composition
- Blurred lines → view in context, good vs. bad oversimplified → only few strains seem important, 1 bacteria present in a certain host environment & a genetic susceptibility can influence health or disease
- Don't oversell → targeting the microbiome will not affect or cure *all* GI diseases



# REGULATORY CONSIDERATIONS



# «Modify\* the Gut Microbiome for the ...

## Biological Drug

- .. prevention, treatment, cure of IBD / ... C.diff. »

## FSMP/ Medical Food (tube feeds or ONS)

- ... dietary management of IBD»

## Food Health Claim (EU NHCR Art.14; US)

- ... risk (factor) reduction of IBD» (~«Disease Prevention»)

## Food Health, S/F Claim (EU NHCR Art.13; US S/F)

- ... normal bowel function/  
increase in faecal bulk»

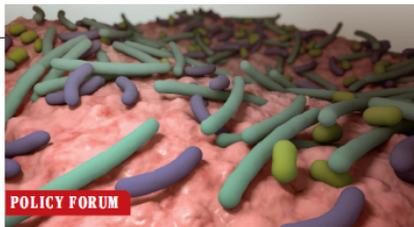
\* incl. e.g. FMT from healthy to sick individuals



# Regulatory framework for personalised nutrition in health & disease

- Current rules & advice based on average requirements & limits (EAR, DRI, UL, ...), health, age or gender related → personal needs, safety, claims may deviate → healthy people (homeostasis) vs. disease
- Measuring tests & devices (e.g. IVD, LDTs, apps, wearables) must be validated to ascertain quality & reliable nutritional advice





SCIENCE AND REGULATION

## Food and microbiota in the FDA regulatory framework

How should microbiota-directed foods be regulated?

By Jonathan M. Green,<sup>1,2\*</sup> Michael J. Barratt,<sup>3,4\*</sup> Michael Kinch,<sup>5</sup> Jeffrey I. Gordon<sup>6</sup>

New understanding of how our gut microbial communities (microbiota) transform dietary ingredients into metabolic products that affect human biology is altering our definitions of the nutritional value of foods (1, 2). We are coming to appreciate how much formation of the gut microbiota during early postnatal life and the traits encoded by its several million microbial genes (microbiome) are important determinants of healthy growth and of our metabolic, physiologic, immune, and perhaps neurologic phenotypes (3, 4). These advances are spawning efforts to develop foods that promote healthy microbiota development during early postnatal life, prevent the loss of microbial diversity associated with Western diets, and repair abnormalities associated with various disease states (5–8). But given the mechanisms by which such microbiota-directed foods (MDFs) may achieve their desired effects, the existing U.S. regulatory framework presents challenges in determining how MDFs should be classified. How these challenges are addressed will affect innovation incentives, product quality, consumer access, and public health. Although

approaches to regulation vary among countries (9), we focus on the U.S. Food and Drug Administration (FDA) because of its global influence and because the products it regulates are often widely distributed.

It has been more than 20 years since the last major revision of regulatory definitions for food ingredients in the United States. When the Dietary Supplement Health and Education Act of 1994 was signed into law, knowledge of the role of the gut microbiota in health and disease was limited. Growing appreciation of how the microbiota generates biomolecules that are not produced by any of our human cell lineages and that affect our health status is forcing us to evolve our concept of essential nutrients to include some of these microbial products (10, 11). A microbiota that cannot generate these products in adequate quantities may lead to disease and is thus a target for reconfiguration by MDFs, which can be defined as foods designed to alter properties of a microbiota. An MDF could alter existing members of the consumer's microbiota in a deliberate manner to affect the community's functional properties, and/or it may provide a substrate that is transformed by the microbiota to products necessary for a healthy state.

### POTENTIAL CLASSIFICATIONS

If an MDF is designed primarily to provide nutritive value, a key question is whether such nutritive value has to be provided directly by the MDF for it to be classified as a "conventional food" by the FDA (i.e., substances ingested primarily for their taste, aroma, or nutritive value). For example, if the MDF affects targeted members of the

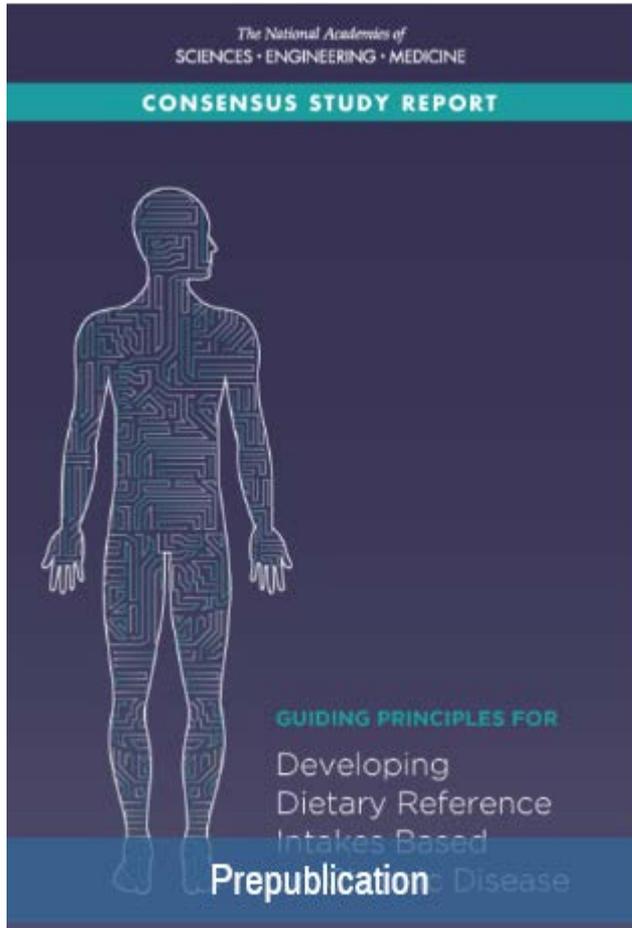
There is rapid growth in the number of products that claim to affect the gut microbiota and benefit health.

microbiota in ways that increase microbial production of a nutrient necessary for a healthy state, would the MDF be considered a food? One way of distinguishing a conventional food from an MDF is that the former is not designed to specifically alter the properties of the microbiota, whereas the latter is intentionally formulated with this goal in mind. In practice, ingredients that target the microbiota may be present in, or deliberately added to, existing products (e.g., human milk oligosaccharides in infant formula (12)).

The distinction between conventional food and an MDF may be inconsequential from a regulatory perspective if the use of the MDF satisfies criteria for being deemed Generally Recognized as Safe (GRAS) and claims fall within the scope allowable for food. Note that it is not the substance itself that underlies GRAS designation but rather its manner of use; moreover, there is no definitive list of substances established as GRAS under conditions of intended use. To establish GRAS status, qualified food-safety experts would have to consider the effects of the MDF, its constituents, and the products of its microbial biotransformation. If an MDF is composed of ingredients with GRAS status, it could be classified as a conventional food. If any components do not have GRAS status, they cannot be added to conventional food without petitioning the FDA for approval as a new food additive. This requires extensive safety testing (13).

If an MDF were classified as a "dietary supplement," it would be possible to make certain claims related to its nutrient content and its effects on health or the structure and function of the body but not claims regarding the treatment, prevention, or diagnosis of a disease. However, if an MDF contains a substance not normally found in food or one that has not been reviewed by the FDA as a new ingredient under a New Dietary Ingredient (NDI) notification, its classification as a dietary supplement would likely be precluded (14).

A "medicinal food" is designed for dietary management of a disease or condition with "distinctive nutritional requirements" (e.g., for management of inborn errors of metabolism, such as phenylketonuria). If an MDF is designed for a condition where insufficiency of a product of a microbiota—or chemicals generated by host cell metabolism of that product—is recognized to be causally related to the condition, then that product might be considered an "essential nutrient" in the context of that condition. An MDF that promotes microbial production of the



OECD publishing

## THE MICROBIOME, DIET AND HEALTH

TOWARDS A SCIENCE AND INNOVATION AGENDA

OECD SCIENCE, TECHNOLOGY AND INNOVATION POLICY PAPERS

September 2017 No. 42



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US Guiding Principles for Developing Dietary Reference Intakes Based on Chronic Disease (S Kumanyika & MP Oria, Eds.; NASEM ...) (2017 pre-publication)



# Increase Flexibility between Food & Drug Frames for Innovative Solution-Focused Dietary Disease Management



## Regulatory Design & Gaps

Geographical Destination & Food or Drug «Intended use»:  
Design @ very start of development:

‘ Changing horses midstream? ’ →

~Start from scratch to meet compliance requirements



«Disruptive innovations» in dietary disease management:  
Difficult to meet all category requirements when switching frames

- ❖ Nutrition vs. drug CMC (monographs; analytics; G(X)P; ...); clinical (disease) endpoints
- ❖ Nutrient «cocktails» not adapted to [mono-]dose-response drug requirements
- ❖ Health vs. disease dosage continuum: nutritional → pharmacologic → toxic
- ❖ Patho-mechanism of action («DNR») proof for medical food, yet not drugs

# Why citizen-driven research strategies

## 20<sup>th</sup> century

- Cure
- Religion of the Average
- “We take good care of you”
- You are either sick or healthy
- Reductionist
- Knowledge imperative
- Certainty / uncertainty

## 21<sup>st</sup> century

- Prevention
- Uniqueness of the individual
- “I take good care of myself”
- Focus on resilience
- Appreciative of complexity
- Learning imperative
- Curiosity

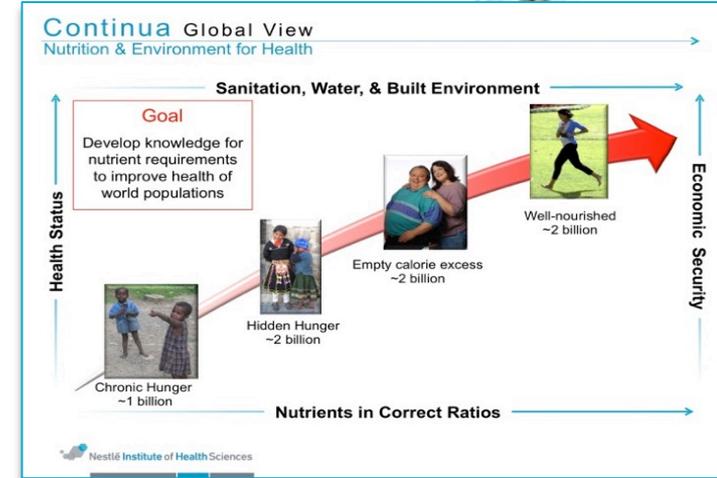


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# Personalised Nutrition's Future?

- Science is crucial to develop effective regulation & policy, but may not provide answers to all aspects
- Incentives for the development of nutrition solutions is of public interest → Accelerate current thinking & approaches → Prepare for unexpected “disruptive”, cost-efficient solutions (“omics”, IT/Big data, diagnostics)
- Nutrition approach still largely driven by averaging needs (EAR, DRI, UL ...). Personalisation is a general, non-stoppable trend. Personalised Nutrition is already amongst us. Both approaches can co-exist together.
- No «over-personalising» (homeostasis vs. disease)
- Demonstrated, perceived & sustained benefit for consumers, patients, health care systems is key → Need for a continued multi-stakeholder dialogue.



# THANK YOU

UNITED STATES · ENGLISH

EUROPE

ASIA

EURASIA

AFRICA

S. AMERICA

N. AMERICA

The following words are the equivalent of the word "thank you" in the languages of the countries shown. The words are listed in the order of the countries shown.



**FRANCE**  
Merci.  
MERSE



**GERMANY**  
Danke.  
DANKHAY



**ITALY**  
Grazie.  
GRAZIE



**CZECH REPUBLIC**  
Děkuji.  
DEKHUY



**GREECE**  
ε-χαρή-ree-STO.  
E-KHAR-REE-STO



**CROATIA**  
Hvala.  
HVALAY



**NETHERLANDS**  
Dankjewel.  
DANKJEWEL



**HUNGARY**  
Köszönöm.  
KOSZONOM



**SWEDEN**  
Tack.  
TACK



**POLAND**  
Dziękuję.  
DEKHUYAY



**JAPAN**  
arigatou  
gozaimasu.  
ARIGATOU GOZAIMASU



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GAMSAMHNIDA



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XIE XIE



**ISRAEL**  
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TUDA



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DHANYAVAD



**VIETNAM**  
Cảm ơn bạn.  
CAM ON BAN



**TURKEY**  
Teşekkür ederim.  
TESKUR EDERIM



**RUSSIA**  
спас-SEE-bah.  
SPAS-SEE-BAH



**EGYPT**  
شكران.  
SHUKRAN



**TANZANIA**  
Asante.  
ASANTE



**BRAZIL**  
Obrigado/Obrigada.  
ORIGADU/ORIGADA



**MEXICO**  
Gracias.  
GRASYAS

## Personalised



1960s

## Nutrition



Treated PKU Patients

- Making a Difference