

**DCMS Consultation on Product Placement on Television  
January 2010**

**Response from Baby Milk Action**

*The US Centre for Disease Control and Prevention (CDC) considered that there are only two potential, cost-effective interventions that can be put into place immediately to deal with the childhood obesity epidemic: **decreased television viewing and breastfeeding promotion.***

*“States Parties recognize the right of the child to be protected from economic exploitation and from performing any work that is likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral or social development.” Article 32 of the Convention on the Rights of the Child.*

*“States Parties shall protect the child against all other forms of exploitation prejudicial to any aspects of the child's welfare.” Article 36 of the Convention on the Rights of the Child.*

**Background and Baby Milk Action's interest**

Baby Milk Action is the UK member of the global network, the International Baby Food Action Network (IBFAN)<sup>1</sup>. We are also the secretariat of the UK Baby Feeding Law Group a coalition of 23 leading health professional and mother-support organisations working to bring UK and EU legislation into line with UN Resolutions.<sup>2</sup>

Baby Milk Action has worked for over 30 years to protect infant and young child health from inappropriate marketing, through the monitoring and implementation of safeguards recommended by the World Health Assembly – the world's highest health policy-setting body – such as the *International Code of Marketing of Breastmilk Substitutes* and the *Convention on the Rights of the Child*.<sup>3</sup>

The protection and promotion of breastfeeding is the most cost-effective intervention for child survival and could prevent 13–15% of child deaths in low-income countries.<sup>4</sup> Breastfeeding is also the optimum and natural way to feed all babies, regardless of where they live, and in the light of its importance to child health the *International Code* was adopted as a ‘*minimum requirement*’ to be adopted ‘*in its entirety*’ by ALL countries.

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<sup>1</sup> IBFAN is a network of over 200 not-for-profit citizens groups working to protect infant and young child health in over 100 countries.

<sup>2</sup> The Baby Feeding law Group Member organisations: Association of Breastfeeding Mothers - Association for Improvements in the Maternity Services - Association of Radical Midwives - Baby Milk Action - Best Beginnings – Breastfeeding Community - Breastfeeding Network - Caroline Walker Trust - Community Practitioners and Health Visitors' Association - Food Commission - Lactation Consultants of Great Britain - La Leche League (GB) - Little Angels - Midwives Information and Resource Service - National Childbirth Trust - Royal College of Midwives - Royal College of Nursing - Royal College of Paediatrics and Child Health - The Baby Café - UK Association for Milk Banking - Unicef UK Baby Friendly Initiative - UNISON - Women's Environmental Network.

<sup>3</sup> The International Code of Marketing of Breastmilk Substitutes, WHO 1981, 12 subsequent relevant WHA resolutions, the **Global** Strategy on Infant and Young Child feeding, the Global Strategy on Diet, Physical Activity and Health, The European Charter on Counteracting Obesity, The Universal Declaration on Human Rights; the International Covenant on Economic, Social and Cultural Rights; the Convention on the Rights of the Child as well as General Comment 12 of the Committee on Economic, Social and Cultural Rights, the ILO Maternity Protection Convention No 183.

<sup>4</sup> Jones et al. *How many child deaths can we prevent this year?* The Lancet, Vol 362 July 5, 2003 65-71 Child survival 11

Artificial feeding places an unnecessary burden on the environment. There can be no food more locally produced, more sustainable or more environmentally friendly than a mother's breastmilk - a naturally renewable resource which requires no packaging or transport and results in no wastage. Breastmilk substitutes, in contrast are the product of the dairy industry and a number of industrial processes, which are all high energy consuming and polluting of our environment.

Breastfeeding also provides an ideal window of opportunity for obesity prevention. Exclusive breastfeeding protects against rapid weight gain during infancy and may also help in the development of taste receptors and appetite control. Systematic reviews have demonstrated an association between not breastfeeding and an increased risk of obesity in childhood which is dose dependent, ie babies who are exclusively breastfed for longer are less likely to develop obesity.

In recognition of the risks of artificial feeding and health savings that can be made, the UK Government has made numerous commitments to increase breastfeeding rates.<sup>5</sup> However, the UK has not yet adequately implemented the *International Code* and current regulations permit a high level of advertising of breastmilk substitutes – mostly in the form of follow-on milks – much of which appear on television.

## **Product Placement**

Baby Milk Action supports the Children's Food Bill Response to this consultation and calls for no product placement to be allowed in UK-made television programmes.

We believe that product placement will not only increase the promotion of HFSS foods, but also the promotion of breastmilk substitutes, feeding bottles and equipment and foods for infants and young children, the marketing of which is undermining UK Government attempts to protect breastfeeding. These products are already inadequately controlled by current UK/EU legislation and the proposal to allow Product Placement will exacerbate an already bad situation. The UK already has one of the lowest breastfeeding rates in Europe. See monitoring reports of the Baby Feeding Law Group and response to the Department of Children Schools and Families consultation: *Assessing the Impact of the Commercial World on Children's Wellbeing*.<sup>6</sup>

## **Monitoring Product placement and sponsorship**

Product Placement and the sponsorship of programmes, presents a more complex problem than crude brand promotions. Not only does it blur the boundaries between advertising and editorial content, it can also be confusing and deceptive when integrated into story lines. Product placement is also difficult to track and monitor, and the option of highlighting occurrences at the start of programmes could exacerbate the problem by implying authoritative endorsement.

If Product placement allows manufacturers of unhealthy foods to link their name to a healthy

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<sup>5</sup> See Choosing Health, Making Healthy Choices easier, White Paper (2004); NICE Maternal and child nutrition Guidance for midwives, health visitors, pharmacists and other primary care services to improve the nutrition of pregnant and breastfeeding mothers and children in low income households (2008) NICE Maternal and Child Nutrition Programme Modelling the cost effectiveness of interventions to promote breastfeeding (2007). "peer support which achieves a relatively high increase in breastfeeding rates actually saves the NHS money in the long run, because levels of hospitalisation of babies drop, breastfed babies grow up into healthier children and adults, fewer women develop breast cancer, and less has to be spent on infant formula."

<sup>6</sup> <http://www.babyfeedinglawgroup.org.uk/monitoring.html>  
<http://www.babymilkaction.org/shop/publications01.html#bflgreports>

activities such as a sport, a halo effect is created which is exacerbated when reformulations are made to foods and accompanied by health and other claims such as – additive free, organic, low fat, ‘fitness’, contains vitamins etc.

Studies show that children are particularly susceptible to embedded brand messages which operate at an subconscious level. The comments of the Campaign for Commercial Free Childhood to the US Federal Communications Commission Notice of Inquiry on embedded advertising, (Sept 08) are useful in this regard:

*“As a result of the constant commercial bombardment, children are now more brand conscious than ever. Toddlers as young as two have been found to have attachments to brands.<sup>31</sup> Children as young as three are capable of recognizing trademarked brand logos. One study found that 81% of three- to six-year-olds after having seen just the logo for Coca-Cola can describe the soft-drink product. On average, teens between thirteen and seventeen have 145 conversations about brands per week, more than twice as many as adults.*

## **Safeguards**

If the UK Government decides to allow product placement in UK-made television programmes, there must at the very least be an absolute prohibition on the placement of ALL food and drink products. Such a ban would benefit adult audiences also.

The existing safeguards included in the AVMS Directive are insufficient to protect children from HFSS marketing, because, according to Ofcom’s figures, 71% of children’s viewing is outside dedicated children’s programming<sup>7</sup>.

The 9pm watershed for traditional HFSS food advertising goes only part of the way to reducing the impact of existing advertising of unhealthy foods to children, and does nothing to address the problem of advertising of breastmilk substitutes.

A complete ban on product placement for all food and drink products – including feeding implements such as bottles etc, is essential.

## **Consultation questions**

*1. What, if any, viewer and other safeguards there should be additional to those required by the AVMS Directive?*

Baby Milk Action believes that product placement in UK-made television programmes should not be permitted. The Government has an obligation under the World Health Assembly Resolutions and the Convention on the Rights of the Child to prohibit all promotion, including product placement of breastmilk substitutes and foods for infants and young children, such as infant formulas, follow-on formulas, growing up milks, baby drinks etc, and feeding bottles and equipment.

In addition product placement of all food and drink products should not be allowed.

*2. How should those additional safeguards be imposed - by law, or by means of the Ofcom Code?*

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<sup>7</sup> Ofcom (2004) *Childhood obesity – food advertising in context*. London

Additional safeguards should be immediately implemented through the Ofcom Code, followed by changes in the law.

Voluntary /self regulation will be utterly inadequate.

*Self-regulation does not work as a way to limit the extent and impact of marketing. Instead, self-regulatory systems promote trust in advertising among consumers and governments, undermining their resolve to bring in the legislation that is needed to protect health. Under these systems the volume of advertising increases.*

Corinna Hawkes, Int.Food Policy Research Institute, Washington. Presentation at the European Platform for Action on Diet and Physical Activity.Feb 2007

### Commercial advantages

3. *Is the range of figures for the potential financial benefit of introducing television product placement set out a Part 3 of this document (between £25m and £140m p.a.) still broadly applicable?*

4. *Is it possible to narrow this wide range of estimates?*

5. *Are there grounds for thinking that the potential benefits have increased or decreased since last year?*

6. *Has any new evidence emerged about the possible benefits since the earlier consultation?*

The baby feeding industry shows no signs of abiding by its obligations under World Health Assembly Resolutions, or halting its drive to maintain and expand its markets in the face of government efforts to protect breastfeeding and infant health. The analysis of the global baby food market, *Euromonitor International*, gives clues as to why companies are so actively trying to undermine government attempts to restrict marketing. The UK should stand firm in its defence of public health by strengthening rather than weakening prohibitions on inappropriate marketing.

*"Baby food global retail value sales will surpass US\$31 billion in 2008, a current value increase of 10.5% from the previous year at fixed US\$ exchange rates. respectively. Western Europe and North America remain the third- and fourth-largest regional markets.....Retail value sales of milk formula will stay somewhat buoyant in Western Europe, particularly in France, to give a constant value CAGR of 3% over the 2008-2013 period. However, sales will decline in the UK, Netherlands, and Denmark....Growth will be virtually static in constant value terms in markets like the UK, Netherlands, Portugal, and Denmark due to such factors as falling birth rates, an increase in breast feeding, the increased popularity of home-made baby food and declining economic growth.....There are significant international variations in the regulations governing the marketing of milk formula, which are reflected in sales differences across countries. The industry is fighting a rearguard action against regulation on a country-by-country basis,"*

Further information can be found in the Euromonitor report *Global Packaged Food: Market Opportunities for Baby Food to 2013*

*"Mothers are returning to a more traditional parenting technique of breastfeeding their children. This presents problems for the baby drinks industry, with the growth of formulas stunted as a consequence. Manufacturers must find ways of creating appeal without positioning drinks as a direct alternative, which creates ill-feeling among mothers. Marketers*

*are becoming more aware of the need to target parents as early as possible. Brand relationships and trust bonds can be formed during pregnancy when the child is not yet even born. This lifestage targeting will becoming increasingly important going forwards.”*  
*Babies and Toddlers: Emerging Opportunities. datamonitor.com*

### Programme genres

7. *If product placement is allowed in programmes made by or for UK television, should any of the programme genres permitted by the AVMS Directive be excluded?*
8. *Should UK controls on product placement be more specific as to what is meant by ‘films and series’ in which product placement can appear?*
9. *Are there definable types of ‘films and series’ in which product placement either should or should not be permitted?*
10. *Should UK controls on product placement be more specific as to what is meant by ‘sports programmes’ in which product placement can appear?*
11. *Is there any reason to restrict product placement in particular types of sports programming?*
12. *Should UK controls on product placement be more specific as to what is meant by ‘light entertainment’ programmes in which product placement can appear?*
13. *Is there any reason to restrict product placement in particular types of ‘light entertainment’ programme?*
14. *Should there be a specific prohibition of product placement in*
  - *religious programmes*
  - *news programmes;*
  - *current affairs programmes;*
  - *consumer programmes; or*
  - *any other specific type of television programme?*

**Baby Milk Action comment:** Product placement could allow further opportunities for manufacturers of unhealthy foods to link their name to a healthy activities such as a sport or worthy causes and create an undeserved halo effect for the whole product range. This halo effect is exacerbated when reformulations are made to foods and accompanied by health and other claims such as – additive free, organic, low fat, ‘fitness’, contains vitamins etc. Baby Milk Action considers that there should be no product placement of any food item on sports programmes.

### Children

15. *Should any or all product placement be restricted or prohibited in programmes with a disproportionately high child audience?*

**Baby Milk Action comment:** The UK has an obligation under the Convention of the Rights of the Child to protect children from exploitation Article 36 says: “*States Parties shall protect the child against all other forms of exploitation prejudicial to any aspects of the*

*child's welfare.*" For the reasons stated above and those expressed by the Children's Food Bill, Product Placement should not be allowed in any programmes.

16. *If so, how should that assessment be made in advance of a programme being broadcast?*

**Baby Milk Action comment:** The concept of "*disproportionately high child audience*" is too problematic to protect children from exploitation.. A complete prohibition on placement of HFSS products would avoid this difficulty.

17. *How could a 'disproportionately high child audience' be defined?*

**Baby Milk Action comment:** It is not possible to define this. There must be a complete prohibition of product placement of all food and drink products (including all breastmilk substitutes and foods for infants and young children, such as infant formulas, follow-on formulas, growing up milks, baby drinks etc, and feeding bottles and equipment).

18. *Should there be restrictions on placing certain types of products (e.g. HFSS foods or alcohol) in programmes with a disproportionately high child audience?; and if so*

19. *Should those restrictions be the same as or greater than those which are currently in place for the scheduling of spot advertising of those products?*

**Baby Milk Action comment:** The best way to protect children from product placement is to maintain the current prohibition. However, if product placement is permitted, product placement for all food and drink products and feeding implements should be prohibited

#### Editorial independence; undue prominence

20. *How could 'undue prominence' be avoided, given the commercial imperative for audiences to recognize the products and services that have been placed?*

21. *At what point should the Government, or Ofcom, draw the line between legitimate paid placement of goods or services and illegitimate 'direct encouragement' to purchase or hire them?*

22. *Are rules – in addition to those that prevent 'undue prominence' and the promotion of placed products – needed to safeguard editorial integrity? If so, what should these be?*

**Baby Milk Action comment:** Product placement inevitably leads to products being given undue prominence in story lines and also affects editorial content. It is also difficult to monitor. One example from the archives: In the 1992 film *City of Joy*, an American doctor working in a Calcutta slum, hands a mother of a malnourished infant (her hands stunted by leprosy) two cans of Nestlé *Lactogen* infant formula. The director denied it was product placement but the scene was not in the original book. The result was that story was distorted to present a dangerous message.

#### Tobacco, alcohol, HFSS foods, gambling

23. *Should television placement of smoking accessories such as cigarette papers and pipes be prohibited?*

**Baby Milk Action comment:** Yes of course.

24. *Should television placement of alcohol, HFSS foods or gambling be subject to an outright prohibition; or, if not prohibited, should it be subject to restrictions of some kind?*

**Baby Milk Action comment:** Yes. Of course.

25. *If it is not practicable to apply the detail of the BCAP Code rules on alcohol advertising to alcohol product placement, would the simple AVMS Directive rules that alcohol advertising must not be aimed specifically at minors and must not encourage immoderate consumption provide adequate safeguards?*

**Baby Milk Action comment:** No – this would not be sufficient.

26. *Are there any alternative forms of safeguard that may be appropriate?*

**Baby Milk Action comment:** Legislation prohibiting product placement of alcohol.

#### Monitoring

27. *What methods of assessment and monitoring would be most effective in ensuring that there was accurate and reliable information about the actual effects of any introduction of product placement in these areas?*

**Baby Milk Action comment:** Product placement is often very difficult to track and monitor, and the option of highlighting occurrences at the start of programmes could exacerbate the problem by conveying an additional implicit ‘authoritative’ endorsement by programme makers.

It is essential that there is truly independent monitoring of product placement and that programme makers are required to disclose all transactions as ‘above the line’ expenditure.

28. *Would it be possible or desirable to levy a charge on product placements to enable monitoring and/or research to take place?*

**Baby Milk Action comment:** While we agree with the CFB that organisations using product placement – if permitted – should pick up any costs and be responsible for monitoring it according to whatever guidelines are agreed, it is crucial that there is in addition independent monitoring and evaluation of its impact. This will be facilitated by a publicly available register of all transactions. The bench mark used in such monitoring should be in line with recommendations drawn up and adopted by the World Health Assembly.

#### Other types of product

29. *Are there any other product or service categories whose placement should be subject to prohibition or restriction?*

**Baby Milk Action comment:** Infant and young child feeding information and advice services.

30. *If so, what, and why?*

**Baby Milk Action comment:** All parents - those who breast feed and those who choose to bottle feed - have the right to objective sound evidence based information.

The International Code of Marketing of Breastmilk Substitutes and subsequent relevant WHA Resolutions contain detailed recommendations regarding the need for objective and consistent information on infant and young child feeding and the need to protect against conflicts of interest.

Baby Feeding Law Group members have had many years of experience monitoring the activities of food companies. Under pressure to reduce direct advertising to children, many are now presenting themselves as ‘*nutrition education companies*’ and most offer phone line help, information or education services. Education is a key way to market products and encourage the use of artificial feeding. Allowing manufacturers of baby foods to sponsor programmes has a profound and harmful effect on breastfeeding rates in the UK. Commercial information which may appear to be educational (because it will inevitably say ‘breast is best’ will almost certainly be biased and misleading and will undermine the Government’s health messages and the aims set out in the *Choosing Health*, White Paper.

Article 4 of the *International Code of Marketing of Breast-milk Substitutes* and subsequent relevant WHA resolutions, which the UK has consistently endorsed but not yet implemented, calls on Member States to provide “*objective and consistent*” information on infant and young child feeding and the WHA Resolutions, especially WHA 59.32, highlight the risks of conflicts of interest.<sup>8</sup> The *Convention on the Rights of the Child* also contains important safeguards regarding breastfeeding and the need to guard against exploitation.<sup>9</sup>

### Terms of trade

31. *If television product placement is allowed, what models might there be for revenue sharing between broadcaster and producer?*

n/a

32. *Does the industry anticipate that the commercial negotiation of product placement arrangements would form part of the terms of trade between broadcasters and producers?*

n/a

### Prop placement market

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<sup>8</sup> WHA Resolution 58.28 urges Member States: (4) *to ensure that financial support and other incentives for programmes and health professionals working in infant and young-child health do not create conflicts of interest;*

<sup>9</sup> Convention on the Rights of the Child: **Article 24** calls on States Parties to “*recognize the right of the child to the enjoyment of the highest attainable standard of health and to facilities for the treatment of illness and rehabilitation of health. States Parties shall strive to ensure that no child is deprived of his or her right of access to such health care services. (e) To ensure that all segments of society, in particular parents and children, are informed, have access to education and are supported in the use of basic knowledge of child health and nutrition, the advantages of breastfeeding, hygiene and environmental sanitation and the prevention of accidents; Article 36* calls on States Parties to “*protect the child against all other forms of exploitation prejudicial to any aspects of the child’s welfare.*”

33. *What impact would allowing television product placement have on the existing product placement market, and on the ability of broadcasters to source products and services in this way?*

n/a

Signalling product placement to viewers

34. *How should television product placement be notified to viewers?*

**Baby Milk Action comment:** A key concern about product placement is that it is not always identifiable. However, if product placement is allowed, its identification on screen by means of a generic logo, text, or spoken announcement while assisting transparency, will not, in itself be adequate because not everyone sees the start of a programme. It is also problematic because it could imply authoritative endorsement.

There is no easy answer to this and a complete ban on product placement would be much more preferable.

35. *When should it be notified to viewers – should we go beyond the EU requirement for notification before and after the programme and after any ad breaks?*

**Baby Milk Action comment:** See comment above

36. *Should notifications to viewers mention the product(s) which has or have been placed?*

**Baby Milk Action comment:** see comment above

37. *Do you have any other views about alerting viewers to the presence of product placement in a television programme?*

**Baby Milk Action comment:** The whole thing – the product placement and the notification of that advert would be extremely distracting and annoying. But not having the notification would be deceptive.

Thematic placement

38. *Should the prohibition of ‘thematic placement’ extend to placements which feature only generic products and services or types of product and service rather than branded ones?*

**Baby Milk Action comment:** The ‘normalisation’ of artificial feeding of babies and excess consumption of junk food are important public health concerns, so the prohibition of ‘thematic placement’ should certainly extend to placements of generic food and drink products in addition to branded ones.

39. *Should the prohibition of ‘thematic placement’ extend to the placement in a programme of references to the beliefs, policies, aims or objectives of the placer?*

**Baby Milk Action comment:** Yes.

Negative and simulated placements

40. *If television product placement is to be allowed, should there be rules which prevent negative placements?*

n/a

41. *Should the regulation of television product placement, if it is to be allowed, contain specific controls on the use of simulated products?*

n/a

**42 Further comments: Industry funded media literacy**

There are now many industry funded media literacy schemes which are promoted as a way to inoculate children against the bad effects of commercial communications. Some appear to be educational but on close examination contain exercises which undermine health messages. It is important that policy makers recognise the dangers of relying on such schemes when considering whether to relax UK advertising rules.

Media Smart, for example, is a scheme that claims to benefit primary school children and provide them with the *“tools to help them interpret, understand and use information provided in adverts to their benefit. The programme teaches children to question their sources of information and helps them think about the influences on their every day choices. The advertising business has a long track record of responsible advertising to children. Media Smart® continues this tradition”* ([www.mediasmart.org.uk](http://www.mediasmart.org.uk))

Although referred to as ‘*not for profit*’ Media Smart is funded by corporate sponsors including the Advertising Association, the British Toy and Hobby Association, Cadbury, GMTV, Heinz, Kellogg’s, Mars UK, McDonald’s and Procter & Gamble.

Baby Milk Action believes that despite its supposedly wide-ranging governance and popularity with primary school teachers, the funding of media Smart has fundamentally influenced its remit and content to the extent that it is educationally harmful

*Media Smart exercises*

- reward children directly in proportion to the amount of television they watch;
- imply that advertisers in the UK are generally ‘responsible’ and that the advertising controls in the UK are effective.
- Imply that junk food ‘taste great’

**For example: *The Smart quiz*** asks: *“Which supermodel is the “face” of the Rimmel UK TV advertising campaign - Jordan, Kate Moss or Naomi Campbell?”* The child cannot move on to the next page until they give the right answer.

In another game, called ***Product Match***, children are asked to match reasons why they might buy certain products. A chocolate bar must be matched with *“Tastes great!”*; a trashy comic with *“A great read!”* and a toy tractor with *“Only £9.99!”*

The European Platform *Working paper on Lifestyles and Education* (June 2008) which was discussed at the Plenary Session in 2<sup>nd</sup> July raised concerns about the effectiveness of Media Smart: “*Media Smart is a media literacy programme for 6 to 11 year olds running in Belgium, Finland, Germany, Hungary, Netherlands, Portugal, Sweden and the UK. The programme teaches children to think critically about advertising and provides free materials for schools using real examples of adverts, funded by the advertising industry. Critics of the initiative have asked for the evidence base to be provided for the rationale of the ‘innoculation approach’ of ‘vaccinating’ children against future exposure to advertising....The available studies on Media Smart centred on schools in which their materials have been used in Britain. Although feedback from teachers has been extremely positive, with 98% of those using the material intending to use it in the future and 86% of these teachers rating it “extremely valuable or very useful”. A closer examination of feedback from teachers who have used the material indicates somewhat mixed results and questions about longterm impact. Much of the data indicates little more than high levels of content recall levels with little further impact.*”

The evaluation of Media Smart (paid for by Media Smart but conducted by the Institute of Education) shows that the pack skips over the commercial impact:

*“They should also encourage children’s efforts to be critical of mainstream media representations a key area of media literacy that is rather neglected in the pack.”*

The evaluators, who despite using commercial incentives such as WH Smith vouchers and a prize draw for a camcorder, had a poor response to questionnaires. However the evaluation reported an ‘excellent’ or ‘good’ rating by 85% of teachers - but this related to success at engaging pupils, design and ease-of-use, age-appropriateness and adaptability.

Teachers used the pack to teach ‘persuasive writing’ rather than about regulation and the evaluation found little evidence of long-term impact.

#### **43 Consultation arrangements**

We support the concerns of the Children’s Food Campaign regarding the arrangements for consultation and the lack of time allowed. The public was given only an eight week consultation period in which to respond – a period which included the Christmas and New Year holidays.

This contravenes the Government’s Code of Practice on Consultation, which states that: “*Under normal circumstances, consultations should last for a minimum of 12 weeks. This should be factored into project plans for policy development work.*” (Section 2.1)

It further states that: “*If a consultation exercise is to take place over a period when consultees are less able to respond, e.g. over the summer or Christmas break...consideration should be given to the feasibility of allowing a longer period for the consultation.*” (Section 2.2)

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