

Government Consultation Response: Restricting promotions of products high in fat, sugar and salt by location and by price

About the Children's Food Campaign: Children's Food Campaign (CFC) aims to improve children and young people's health by campaigning for policy changes in our schools, in our communities and throughout our society that would promote healthy and sustainable food environments. It is a project of charity Sustain: the alliance for better food and farming. Children's Food Campaign is supported by over 100 UK-wide and national organisations, including children's and health charities and professional bodies, trade unions, school food experts and environmental organisations.

About Sustain: Written evidence submitted by Sustain: the alliance for better food and farming. Sustain advocates food and agriculture policies and practices that enhance the health and welfare of people and animals, improve the working and living environment, enrich society and culture and promote equity. We represent around 100 national public interest organisations working at international, national, regional and local level. Sustain coordinates the Children's Food Campaign, and the Sugar Smart campaign. We work with our members and others to promote integrated healthy and sustainable policies and practices for food, farming and fishing.

Q1-19 Information about us

Businesses and products affected

20. Do you think that the restrictions suggested in this consultation should apply to all retail businesses in England that sell food and drink products, including franchises? Yes/no. If yes, please explain

Yes, we welcome the proposals to restrict both price and location promotions of HFSS products as one measure to support a healthier food environment for children. We believe all available policy levers must be applied in order to meet the government's ambition to halve childhood obesity by 2030.

We believe all retail businesses selling food and drink should comply with new restrictions, especially in terms of price offers on HFSS products. Many national food and drink retailers operate through a franchise model, manufacturers promote price and location offers via them, and these local stores are part of the local retail landscape for many communities. For example, there are over 2,400 branches of Spar in the UK (with a combined turnover of £3bn+)¹, whilst the UK's 2500 Nisa franchise business² was acquired by the Cooperative Group in 2018³. Franchises and convenience stores are a major part of local shopping landscapes. There are around 50,000 convenience stores in the UK, accounting for £38 billion in sales in 2017, around one fifth of the UK grocery market⁴. Franchise models like Nisa, Costcutter or McColls will often manage and decide promotional activity to be activated through franchisees who order food and drink products, other supplies and promotional merchandising materials through them.

21. Do you think there are any other retailers that the restrictions suggested in this consultation should apply to? Yes/No. If yes, please explain which retailers and why.

Yes. The restrictions should apply to any type of retailer selling food or drink high in fat, salt and sugar, even where this is not their primary business. Increasingly there are displays and offers for confectionery, snacks and other HFSS products in a more diverse range of retailers, including clothing stores, pharmacies and chemist shops, toy stores, bookshops and stationery stores, garage forecourts, transport hubs and more. We believe that restrictions should apply to outlets visited whilst travelling, such as garage forecourts, service station entrances and airport duty-free stores, for example.

22. Do you think there are any retailers that the restrictions suggested in this consultation should not apply to?

No. We believe the government should aim to create applying across the retail landscape, as to provide exemptions may result in unfair competition between businesses. We believe that aiming for maximum coverage of the restrictions will give the potentially biggest impact in terms of sending out more consistent public messaging, and therefore the biggest potential cost-benefit in terms of the contribution of the policy towards creating a healthier food environment.

23. Do you think that the restrictions should also apply to retailers that do not primarily sell food and drink, for example, clothes retailers and newsagents? Yes/No. Please explain your answer.

Yes. There should be consistent regulation of promotional activity for any retailer selling HFSS products. There is growing evidence that a range of non-food retailers are also promoting and selling HFSS products. The UK Health Forum and Food Active conducted a study in 2018 of 330 non-food retail outlets and found 29.3% were selling food and drink. 40.8% of items on sale were sweets and confectionery, and a further 10% were sugary drinks and 9.6% biscuits. One third of items were part of a promotion, and 42% of items were located at the checkout.⁵ A consumer survey conducted as part of this same study showed that 42% of respondents reported purchasing food or drink while shopping in non-food stores in the previous month. The majority (66%) of the food or drink items that were reported as purchased were classified as less healthy e.g. sweets and chocolate, savoury snacks, sugary drinks and energy drinks. Therefore restricting the sale of unhealthy food and drinks in non-food retailers has the potential to reduce consumption of unhealthy foods.

In a survey of parents conducted by the Children's Food Campaign during February and March⁶, of the 347 parents who responded to a specific question on the types of shops that government restrictions might apply to, 71.5% (n=248) agreed that restrictions should apply to non-food shops like clothes retailers and pharmacies, 70% (n=244) agreed it should include petrol stations and 63% (n=219) agreed it should include newsagents and corner shops. This compares to 75% (n=261) who agreed it should cover large national supermarket chains, so the levels of public support for measures to apply across the different types of stores are very similar.

24. Do you think that the restrictions should also apply to imported products within the specified product categories in scope? Yes/No. Please explain your answer.

Yes. There is no reason to exempt imported products from the restrictions, we believe definitions should relate to the nutritional content of the products, not their origin.

25. Do you think that the restrictions should also apply to online shopping? Yes/No. Please explain your answer.

Yes, online grocery shopping is currently the fastest growing grocery channel in the UK, and according to IGD is predicted to grow 52% from 2018 to 2023.⁷ According to Mintel, the number of people doing at least some of their grocery shopping online grew from 43% to 48% between 2014 and 2017, and this trend is set to continue.⁸ We believe given current and future trends, all price promotion restrictions should apply equally online, and retailers should not encourage shoppers to seek deals online that are not available in store, as this will simply displace consumer purchasing and undermine the impact of the restrictions. We believe it is possible to define the equivalent of entrance, aisle end and locational display advertising within online shopping sites and equal restrictions should therefore apply.

26. If the restrictions applied to online retailers, how could this work in practice?

In relation to volume-based price promotions, we believe pricing policies must be applied to the products regardless of whether purchased in-store or online – the same deals must be restricted by the retailer.

In relation to the equivalent of location-based promotions, we believe it is possible to define online rules and practices that reflect the in-store restrictions. At the very least, this would mean that no HFSS products should be featured or promoted in such places as:

- on the home page
- as a pop-up or plug in advert in any section outside of its own immediate product category or section
- as a suggested replacement or a complementary item for a product that has been placed in the online shopping basket
- during any part the online checkout process, including as a prompt to increase number of items in order to access a volume-based discount.

Furthermore, we believe that price promotions for HFSS products should not be made prominent or 'top of display lists' in any sections of grocery websites pertaining to the current special offers or deals available in-store or online.

27. Who should be responsible for making sure the price restrictions are followed: the retailer that sells the products or the manufacturer that makes them?

Retailers must be held primarily responsible for ensuring price restrictions are followed. UK Competition Law holds the retailer accountable for the price the consumer pays at checkout. In practice manufacturers often pay retailers for price and location promotions as part of an agreed marketing strategy, and the basis on which they work and apply in-store. However, the retailer is closest to the consumer and ultimately responsible for any in-store promotion that takes place, and therefore must be held responsible for ensuring price promotions follow restrictions introduced by the Government.

Manufacturers must be held responsible for ensuring that no volume-based price promotional offers (such as 50% Extra Free, or 3 for £1) are printed on product packaging.

Furthermore there must be infrastructure in place to monitor that retailers (and manufacturers where necessary) are complying with any restrictions, as part of ongoing trading standards inspections.

28. Who should be responsible for making sure the location restrictions are followed: the retailer that sells the products or the manufacturer that makes them?

Retailers – whether physical stores or online shopping sites – must be held responsible for ensuring all location restrictions are followed, as they have ultimate control over how all products are displayed and promoted to customers both online and in-store. We believe that responsibility for monitoring compliance with restrictions must be integrated with routine trading standards inspections.

Price promotion restrictions

29. Which of the following options do you think is the most appropriate for achieving the aims of this policy:

Option 1 - Require retailers to ensure that all their volume based price promotions on food and drink are on healthier products.

Option 2 - We are open to alternative suggestions from stakeholders as to how this policy could be implemented in order to reduce overconsumption of HFSS products but also to encourage businesses to promote healthier products and to further incentivise reformulation. For example, we have explored the possible impact of requiring retailers to ensure that at least 80% of their sales from volume based price promotions on all food and drink per year are on healthier products.

Neither

Please explain your answer.

We support Option 1 and oppose Option 2, and that price promotions must not be offered for products defined as high in fat, salt and/or sugar according to the established Nutrient Profile Model, which is the evidence based tool already used and understood by the food industry in relation to advertising restrictions. According to the government's own impact assessment this is the option that will have the highest impact on public health, with benefits from reduced overweight and obesity or diet-related diseases from excess calorie consumption estimated to be £3.1 billion.

We believe that a partial coverage option (such as Option 2) will not deliver the same impact, and will also provide a get-out clause for manufacturers and retailers that may reduce the incentive to reformulate products in order to avoid any new restrictions.

The Children's Food Campaign conducted a survey of parents during February and March 2019 to ascertain their experience and views on promotion of healthy and unhealthy foods. 374 parents with a total of 704 children responded⁹. Almost 4 in 5 parents (78.3%, n=293) said they regularly (37%, n=138) or occasionally (41.4%, n=155) buy food and drink products promoted specifically on multi-buy deals, such as buy 2 for £x or buy one get one free. 3 in 4 parents (74.7%, n=279) said they regularly or occasionally take up offers involving extra for the same price. A smaller number of parents, just 1 in 4 (25.7%, n=96)

said they regularly take up linked offers (eg. adding a half price soft drink if buying another item). 73% (n=269) of parents agreed with the statement that “Price promotions and displays in-store encourage people to buy food or drink they don’t really need”, and 50% (n=182) strongly agreed. When asked if “the food displays I see at checkouts, store entrances and at the ends of aisles support me to make healthy choices”, only 12% of parents agreed, whilst 62% (n=227) of parents disagreed, and 32% (n=117) disagreed strongly.

Evidence is clear that price promotions on HFSS foods do not save people more, but actually encourage people to spend more¹⁰. This is why manufacturers and retailers run such promotions – the logic of the model is that any reduction in price offered is more than offset by an increase in the overall volume of purchase. Cancer Research UK analysis of Kantar Worldpanel data¹¹ indicates high users of HFSS promotions tend on average to purchase more unhealthy food and drink, an average of 11 HFSS products per month for a typical family of 2 adults and 2 children, compared to low promotional users. High promotional users purchase fewer products high in fibre and protein, such as vegetables. In short, they do not save people money overall, and they do affect the overall health of people’s shopping baskets.

As one parent of five children in our survey said, *“It’s rare to find offers on healthy products and when shopping with my teenagers they often think they’re helping by putting things in the trolley that are on offer, but it’s usually items that we don’t need in those quantities but it seems better value due to the offer, so we often come home with more than we need.”*

We believe that Option 1 is the option that parents would support. Two in three parents in our survey (66%, n=239) said that promotions encourage their children to ask for unhealthy products – some of those their children didn’t ask for them also told us it was because their children were too young to ask, or “knew better than to ask” because they knew the answer would be no. More than 60% of parents in the Children’s Food Campaign survey agreed that the government should issue restrictions to:

- (a) Remove unhealthy foods from linked offers eg. Buy X, Get Y free/half price (70.5%, n=248)
- (b) End unlimited free refills of sugary drinks in cafes and restaurants (69.9%, n=246)
- (c) Stop multi-buy volume deals for unhealthy foods like ‘2 for £1’ (65%, n=229)
- (d) Stop ‘extra for the same price’ offers on unhealthy food (63.1%, n=222)
- (e) Remove unhealthy foods from combination offers and meal deals (62.8%, n=221)

We believe Option 1 is simpler and less confusing for the public. Applying restrictions throughout the year and consistently on such products is simpler to enforce and monitor compliance, sends a clearer signal to manufacturers, retailers and consumers alike. We believe it could be challenging to enforce or police a partial restriction approach such as a 20% threshold and define the basis on which partial restrictions would be calculated.

An overall shift of price promotions towards healthier, more nutritious products could also support people who need healthy food to become more affordable and a 20% threshold as proposed in Option 2 could undermine this.

Whilst we support Option 1 and price restrictions starting with the volume-based price promotions described in the consultation document, we believe this approach may still leave a significant amount of HFSS price promotions available for consumers, and may lead to a shift by retailers and manufacturers to increased price reduction or other new promotional mechanics or packaging solutions on HFSS products to avoid the restrictions but continue to promote these products heavily. Some retailers, in particular Sainsbury’s have increasingly moved away from traditional multi-buy promotional mechanics on food¹². Research by the

Obesity Health Alliance in 2018 indicated that despite many price and location promotions in-store on HFSS products in Sainsbury's, 52% were temporary price reductions and none fell into the category of volume-based promotions as defined in the consultation document. In Tesco, only 16% of price promotions were multi-buy type campaigns, compared to 66% price reduction¹³. The growing prevalence of £1 deals on sharing bags and multi-packs of crisps, snacks, confectionery and sweets is of particular concern in this respect, both in multiple retailers and local convenience stores, which incentivise, and normalize, purchase of larger size formats over single portion sizes and equally encourage 'stockpiling' of unhealthy foods must be addressed.

We believe that if the government introduces restrictions first on volume-based price promotions, it must monitor and review how far manufacturers and retailers simply shift towards increased use of these type of temporary price reductions on larger size formats and multi-packs, especially for the most obvious categories of 'junk food' such as crisps and savoury snacks, sugary drinks, confectionery and sweets.

If you are proposing an alternative option, please explain how your preferred option would better deliver the aims of this policy, how it would be delivered and whether there would be any practical and/or implementation issues that we should be aware of.

N/A

30. Do you think that the price restrictions should apply to 'multibuy' promotions and 'extra free' promotions of pre-packaged HFSS products (see Annex 5)? Yes/No. Please explain your answer.

Yes, restrictions should definitely apply to these types of promotions for all HFSS products in scope of the restrictions, and not just those that are pre-packaged. For example, sugary bakery products are often sold loose, not pre-packaged, but use the same volume-based multi-buy price promotional mechanics, and should be considered within scope of the restrictions.

A 2014 Which? survey of over 77,000 promotions in major supermarkets in 2014 revealed that over 53% of promotions were for less healthy products, and more than half of all confectionery was on offer¹⁴.

We support the introduction of price restrictions on 'multi-buy' and 'extra free' promotions because evidence from research indicates that these lead to increases in purchases of the promoted products, ranging from 12% to 60%, according to one literature review.¹⁵ Whilst it is harder to assess whether multi-buy purchases always result in increased consumption, evidence also suggests that bulk purchase and stockpiling are often associated with greater consumption, as increased quantities of food are present in the household.

Recent analysis of Kantar Worldpanel data by Cancer Research UK has shown that shoppers who more regularly engage with food promotions on HFSS products are on average less likely to purchase as many products that are high in vitamins, minerals, protein and fibre¹⁶.

In the Children's Food Campaign survey of parents during February/March 2019, 65% of parents (n=229) agreed that the government should restrict multi-buy deals on unhealthy foods, and 63.1% (n=222) agreed that 'extra for the same price' offers should be restricted.

There is also evidence that price promotions incentivise unplanned – or impulse – purchases of HFSS foods. In a 2018 survey of adults in the North West of England by Food Active, over

half of promotional purchases made by participants were reported as unplanned 'impulse' purchases, and the most popular items purchased on promotion were puddings and desserts, chocolate, sweets and crisps¹⁷. Volume-based price promotions constituted over a quarter of these purchases, but a greater quantity of these impulse purchases were triggered by temporary price reductions, indicating that even introducing restrictions on multi-buy and 'extra free' will still leave many loopholes for unhealthy product promotions to exploit, and these should be subject to further research and monitoring as part of the implementation of any initial restrictions.

31. Do you currently use or do you know about any official definitions of these types of price promotions? Yes/No. If yes, please provide them below.

No. We would welcome the government providing official definitions of these types of price promotion, and the effect that they are designed to have.

32. Do you think there are any other types of price promotion that should be restricted that we have not mentioned? Yes/No. If yes, please explain which types of promotion and why.

Yes. We acknowledge that the government is focussing attention first and foremost on volume-based price promotions, however we believe that current grocery trends are already moving away from these types of promotion towards temporary price promotions, which are now the dominant price promotion mechanic for categories such as confectionery, crisps and snacks. Sainsbury's announced it was ditching volume-based promotions in February 2016, and the in-store research by Obesity Health Alliance in 2018 showed that whilst there was significant in-store promotion of HFSS products, the dominant mechanic was temporary price reduction. Stores such as WHSmith and Poundland routinely encourage shoppers (through checkout staff or prompts at self-checkouts) to consider additional discount-priced HFSS products at the point-of-purchase, which contribute similar impulse purchasing of larger volumes of HFSS products. This type of 'nudge marketing' on HFSS products should also come under further scrutiny by Government as part of any monitoring of shifts in marketing tactic by manufacturers and retailers.

The evolution of new packaging and sizing formats means that larger volumes of HFSS products are now increasingly sold as 'sharing bags' or as packaged together in multi-packs (eg. 4 chocolate bars for £1, compared to typical 65p single bar pricing) alongside the single size versions. Polling of adults by the Grocer revealed that one in four people admit to eating a sharing bag of confectionery on their own in one go, with the figure rising to one in three for 16-24 year olds¹⁸.

Therefore we believe that if the focus of the initial phase of price promotion restrictions is focussed on multi-buys and 'extra free', the Government should also commit to monitoring and evaluating the effect of these, and whether in fact promotions and purchasing are merely diverted to other forms of price promotion linked to purchase of larger volumes, and consider additional restrictions or complementary measures. In the meantime, we would welcome further research on the likely impact of the remaining promotional mechanisms still allowed for HFSS products, including their effect on overall spend on healthy vs unhealthy products, especially in relation to lower-income families.

33. Do you think that the price restrictions should apply to pre-packaged products which fall into the categories included in Public Health England's (PHE) sugar and calorie reduction programmes and in the Soft Drinks Industry Levy (SDIL), and are classed as high in fat, sugar or salt (HFSS) (see Annex 3)? Yes/No. Please explain why.

Yes. We agree that the price restrictions should definitely cover all the products currently rated as high in fat, salt and/or sugar (HFSS) under the current Public Health England (PHE) Nutrient Profile Model (NPM) that fall into categories included in the Soft Drinks Industry Levy (SDIL) , and the sugar reduction and the calorie reduction programmes. There are also some products, in particular fresh bakery goods, that are sometimes not pre-packaged and so we do not agree that the restrictions should be limited to pre-packaged goods only.

We support the NPM as the established and evidence-based definition for HFSS products whilst the sugar reduction, calorie reduction and SDIL programmes target those specific categories assessed as contributing the most additional calories to children's diets, and therefore the ones where reformulation could support the effort to address child overweight and obesity. The NPM is already well understood and used by food and drink manufacturers, retailers and marketing/advertising professionals in relation to advertising, so this is consistent.

We are concerned however that adopting a supplementary product category approach may lead to a longer legislative process in order to define the categories in enough detail so as to be able to implement the restrictions, and may be open to challenge or interpretation of what constitutes a product in that category. Furthermore, we note that in the case of the current Ofcom and CAP regulations on advertising HFSS products to under-16s, there is no additional product categorisation applied – it relates to all HFSS products covered by the NPM. We would advocate therefore that the most holistic application of the NPM should be applied across all forms of advertising and promotion.

We are aware that a review of the NPM has been conducted in 2018, but that it is the 2004/5 model proposed as the basis for the restrictions. If Government decides not to apply the restrictions to all HFSS products under the current NPM, but to restrict the scope to products under the SDIL, sugar and calorie reduction programmes, we strongly recommend that this is seen as a first phase of restrictions and is made subject to formal review. We further recommend that government should make a clear commitment to consider the potential future extension of restrictions to other categories or all products under any future or revised NPM.

34. Do you think any other product categories should be included in these restrictions? Yes/No. If yes, please explain which product categories and why.

We believe that in future, price promotion restrictions should be considered for other categories classed as HFSS under the current or any revised version of the NPM.

Furthermore, in line with proposals to end the sales of high caffeine energy drinks to under-16s, either as part of these restrictions or additional measures to support the ban, price and locational promotional restrictions on all types of energy drinks (not just high sugar versions) should be considered.

Finally, recognising that products high in salt are also part of the NPM and can lead to high blood pressure and other diet related diseases, we would recommend that the government consider whether the scope should be extended to include PHE salt reduction categories, in line with the launch of a new salt reduction programme.

35. Do you think any of these categories should not be included? Yes/No. If yes, please explain which product categories and why.

No. We believe that the restrictions should be aligned with current approaches on the NPM, sugar reduction and calorie reduction, and any further exclusions will only serve to confuse the food and drink industry.

36. Do you think that the price restrictions should also apply to free refills of sugar-sweetened beverages in the out-of-home sector, if they are in scope of the SDIL, including where they could be a part of a meal deal? Yes/No. Please explain your answer.

Yes – we would welcome the restrictions being applied to free refills of sugar-sweetened beverages, which are the top source of sugar for children aged 11-18. In the Children's Food Campaign Parents' Survey, 7 in 10 parents (69.9%, n=246) agreed that the government should regulate to stop companies offering unlimited free refills on sugary drinks to children. Recognising that not all sugar-sweetened drinks consumed by children (especially sugary milkshakes) are covered by the SDIL, but that this may change in future, and the high sugar content of these drinks, we would recommend that restrictions on free refills apply both to those covered under the SDIL and by the PHE sugar reduction programme.

37. For food and drink consumed outside of the home, are there other types of price promotion that should be restricted? Yes/No. If yes, please explain which promotions we should consider and why.

We would like to see the restrictions include unlimited refills of any type of HFSS product as defined by the NPM, as research in the out-of-home sector suggests that in some popular family dining establishments such promotions are not limited to sugary-drinks covered by the SDIL. There is evidence that some out-of-home establishments have adjusted their policies on sugary fizzy drinks but not other high sugar products. For example, Pizza Hut has now moved its unlimited fizzy drinks to the low and no-sugar options that fall outside the SDIL, but still continues to offer unlimited ice-cream with confectionery accompaniments as part of its kids' menu¹⁹.

Meal deals targeted at children should also be restricted, in both retail and the out of home sector. Action on Salt recently surveyed salt levels in children's main meals²⁰, available at popular chain restaurants and fast food outlets operating across the UK. They found that 41% of meals had more than 1.8g of salt per portion, which is the target level of salt for children's meals sold in the out of home sector, as set by Public Health England. Many of these meals were sold as part of a meal deal, with 18 of the 26 outlets (69%) surveyed offering a low cost meal deal to children, typically consisting of a main, side, dessert and drink. This incentivises the purchase of more food and therefore increases the total level of salt, calories and sugar sold to children.

Recognising the increasing trend towards eating out-of-home, a proliferation of fast food outlets, cafés and restaurants offering meal deals and kids' deals, we would welcome further monitoring and research on the offers available in this sector and their likely contribution to consumption of excess calories, salt, fat and sugar by children.

Location restrictions

38. Which of the following options do you think is the most appropriate to achieve the aims of this policy:

Option 1 - We propose that the location restrictions should apply to the following locations: store entrances, ends of aisles and checkout areas (see Annex 2).

Option 2 - We are open to alternative suggestions from stakeholders as to how this policy could be implemented. If you are proposing an alternative option, please explain how your preferred option would better deliver the aims of this policy, how it would be delivered and whether there would be any practical and/or implementation issues that we should be aware of.

Neither

Option 1. We welcome the Government proposal to restrict location-based promotions of HFSS products in-store and online, as part of overall efforts to reduce exposure by children to displays of less healthy products, and ultimately deliver its ambition to reduce childhood obesity by half by 2030. Option 1, according to the Government's own impact assessment is the one that is likely result in the most positive health benefits, potentially reaching £4.5 billion over the next 25 years, if implemented. The cost savings to the NHS are estimated to be a potential £3bn alone.²¹

We believe that introducing restrictions on in-store displays at checkouts, aisle ends and store entrances would be popular with the public and especially would support parents shopping with their children. The Children's Food Campaign's own February/March 2019 survey of parents shows more than 3 in 4 parents (76.7%, n=270) – the highest level of support of all the different measures included in this consultation - agreed with a ban on these locational promotions for HFSS products or 'less healthy' food and drink. (NB It is worth noting that this overwhelming support comes despite encouragement from a small number of libertarian economists via Twitter to deliberately seek to influence our findings, and clear evidence from our survey data analysis that several did respond. We have of course retained these responses alongside all others as part of our overall findings for balance, as they still represent genuine public views).

Manufacturers invest in promotions with retailers to display their products in prominent locations in stores and online because it works in driving increased purchase. Evidence shows that when products are placed in convenient and eye-catching locations, it results in increased sales of these products²². Parents tell us that placing these items in entrances, checkout areas and other prominent locations close to family staples results in increased pester power, and whilst they do not always succumb to this pressure, they are clear it makes it more difficult to consistently promote good behaviour. It encourages parents to inadvertently associated 'treats at checkouts' for good behaviour while shopping, and many parents say that the growing dominance of junk food displays in-store has resulted in shopping becoming an arena of tension between parents and children. Some parents reported that they have even stopped taking children into certain stores, or taking them shopping altogether, in order to avoid conflict at the checkout. Removing these products from checkouts can serve to reduce consumer impulse purchase. Evidence from the University of Cambridge published in late 2018 has shown that voluntary actions to remove sweets, crisps and confectionery from some supermarkets checkouts resulted in 76% fewer of these products being purchased, compared to retailers without this policy.²³ One study as

part of research for NHS Health Scotland in 2017 showed that placing soft drinks at the ends of aisles resulted in more than 51% increased sales.²⁴

This is consistent with Food Active's recent survey of 379 adults in the North West of England, in which 75.1% of respondents supported introduction of restrictions on promotions of less healthy products in prominent locations, and 49.6% 'strongly agreed'²⁵. Just 15% disagreed or strongly disagreed.

39. Do you think that the location restrictions should apply to all of the following locations: store entrances, ends of aisles and checkout areas? Yes/No. Please explain your answer.

Yes. These areas are those with the highest footfall of shoppers that nearly all shoppers are forced to pass as they make their way through the store, and therefore must be at the heart of any new restrictions.

Evidence from research suggests that removing unhealthy food at checkouts would have an impact on the amount purchased. A 2018 longitudinal study of voluntary supermarket policies on less-healthy foods at checkouts, showed that sales of sweets, chocolate and crisps declined by 7% almost immediately after supermarkets announced a checkout policy and one year later 17% fewer of these products were being purchased.²⁶

However, there is also significant evidence that voluntary efforts have not been sufficient in reducing exposure to HFSS product promotions. Despite the first voluntary pledges to remove sweets from checkouts were made over 20 years ago, there is still a very high prevalence of in-store promotions of HFSS products in prominent locations. The definitions applied by retailers to what constitutes 'the checkout' appear very blurred, as do the product categories to which voluntary measures apply. Research in 2018 by the Obesity Health Alliance in five large stores owned by national retailers indicated that 70% of all food and drink products in store entrances, aisle ends and checkouts were for food and drink included in PHE's sugar (42%) and calorie reduction (27%) programme or soft drinks covered by the SDIL (1%)²⁷. Less than 1% of promotions were for fruit and vegetables. This suggests that in many retailers, those earlier voluntary commitments have slipped over time.

Insights from parents in our survey talked about how they regularly deploy their own parenting skills to say no to their children pestering for unhealthy foods and drinks. However, a number of parents say that when their children are tired or bored, they sometimes give in to pestering to avoid a 'scene' in the store. As one parent said, *"Putting sweets at checkouts can be an issue as children have to stand there while adults pay for the shop, so they will see it and ask at the most stressful part of the shop. Sometimes I have just given in at this point and bought the product as I am under pressure to load, pay for and bag the shop alone."* Many parents say they now avoid where they can taking their children into shops where they know there may be an issue. One parent said, *"My children constantly ask for unhealthy products when they are prominently displayed in shops. It is tiresome so I try to avoid taking them into shops as much as possible. I often say no, because I don't want them to associate shopping trips with 'treats'."* Parents also spoke about the mixed signals their children get from special offers and in-store displays. As one said, "It is clear that for many parents, the child eye-level displays on shop floors and especially close to pay points remain a major issue, even for those who are successfully resisting the pressure from their children to buy these products.

Whilst we would welcome restrictions removing HFSS products from entrances, checkouts and ends of aisles, defining the acceptable perimeter for restrictions in relation to different sizes of stores may not be straightforward. For example, we have noted in some supermarkets, whilst there are no products on display next to the staffed checkouts, the queue areas for self-checkouts have in effect become a chicane of confectionery, crisps and snacks. HFSS products are also regularly promoted alongside other healthier foods through use of free-standing display units and hanging displays. In addition, we believe that government restrictions need to be future proofed and recognised that the stores of the future may not have traditional checkouts at all, as in-store app-based purchasing technology starts to take off. Therefore, every aisle becomes a self-service checkout.

We would therefore encourage government to explore a 'back in its rightful place' policy for location-based promotions, in which HFSS products in scope of the restrictions may only be promoted in the context of the section/aisle/shelves in which their own product category is located. This would enable parents to avoid such areas altogether, reduce impulse purchasing, whilst allowing any shopper to seek out these products if they wish to purchase them. This would have the effect of removing such products from all the areas being proposed, but also future-proof the policy for maximum impact on consumer purchasing behaviour, and reduce the ability of retailers to migrate displays of HFSS products through innovative store reformatting, new types of display vehicles and IT-based purchasing tools, to continue to promote impulse purchase of HFSS products.

Recent evidence by Food Active and the UK Health Forum for Public Health England (PHE) has also shown that many non-food retailers, such as pharmacies and cosmetic stores, clothing stores and stationery/newsagent stores are promoting less healthy food items in prominent locations in their stores, and particularly at checkouts to trigger additional impulse purchases²⁸.

40. Do you currently use or do you know about any official definitions for these locations? Yes/No. If yes, please provide them below.

No. As stated in Q40 whilst we welcome a policy to remove HFSS products from these locations, we are concerned that seeking specific definitions for all types of store and size of store may prove challenging, and result in retailers reformatting their stores and the precise mechanics of display tools used in order to avoid the definitions. Tesco is reported to be trialling mobile payment apps which mean customers are scanning and checking out their own purchases as they move around the store – in this way every aisle becomes a checkout.²⁹

For this reason, we would encourage Government to consider the potential advantages of an 'in its own place' policy for HFSS products, compared to an option that seeks to define specific locations, in which effectively these products are only displayed in their own product category sections, and therefore customers may choose whether to look at these shelves or aisles, or to avoid them.

41. Do you think there are other locations inside stores where the restrictions should apply to? Yes/No. If yes, please explain which locations and why.

Please see our comments on Q39 & Q40 regarding an 'in its own place' policy to reduce the risk of displacement within stores, and future proof the restrictions in light of future cashless and app-based point of purchase developments..

We also agree with the Obesity Health Alliance that the policy should address the use of Free Standing Display Units, recognising that their research indicated that 83% of products on display via FSDUs were for products that are high contributors to excess sugar and calorie consumption by children under Public Health England's sugar reduction, calorie reduction programmes and the SDIL, including confectionery, crisps and sugary cereals.

42. Do you think that the location restrictions should apply to all products (whether pre-packaged or nonpre-packaged) which fall into the categories included in PHE's sugar and calorie reduction programmes and in the SDIL, and are classed as HFSS (see Annex 3)? Yes/No.

Yes. We agree that the price restrictions should definitely cover all the products currently rated as high in fat, salt and/or sugar (HFSS) under the current Public Health England (PHE) Nutrient Profile Model (NPM) that fall into categories included in the Soft Drinks Industry Levy (SDIL) , and the sugar reduction and the calorie reduction programmes. There are also some products, in particular fresh bakery goods, that are sometimes not pre-packaged and so we do not agree that the restrictions should be limited to pre-packaged goods only.

We support the NPM as the established and evidence-based definition for HFSS products whilst the sugar reduction, calorie reduction and SDIL programmes target those specific categories assessed as contributing the most additional calories to children's diets, and therefore the ones where reformulation could support the effort to address child overweight and obesity. The NPM is already well understood and used by food and drink manufacturers, retailers and marketing/advertising professionals in relation to advertising, so this is consistent.

We are concerned however that adopting a supplementary product category approach may lead to a longer legislative process in order to define the categories in enough detail so as to be able to implement the restrictions, and may be open to challenge or interpretation of what constitutes a product in that category. Furthermore, we note that in the case of the current Ofcom and CAP regulations on advertising HFSS products to under-16s, there is no additional product categorisation applied – it relates to all HFSS products covered by the NPM. We would advocate therefore that the most holistic application of the NPM should be applied across all forms of advertising and promotion.

We are aware that a review of the NPM has been conducted in 2018, but that it is the 2004/5 model proposed as the basis for the restrictions. If Government decides not to apply the restrictions to all HFSS products under the current NPM, but to restrict the scope to products under the SDIL, sugar and calorie reduction programmes, we strongly recommend that this is seen as a first phase of restrictions and is made subject to formal review. We further recommend that government should make a clear commitment to consider the potential future extension of restrictions to other categories or all products under any future or revised NPM.

43. Do you think any other product categories should be included in these restrictions? Yes/No. If yes, please explain which product categories and why.

We believe that in future, price promotion restrictions should be considered for other categories classed as HFSS under the current or any revised version of the NPM.

Furthermore, in line with proposals to end the sales of high caffeine energy drinks to under-16s, either as part of these restrictions or additional measures to support the

ban, price and locational promotional restrictions on all types of energy drinks (not just high sugar versions) should be considered.

Finally, recognising that products high in salt are also part of the NPM and can lead to high blood pressure and other diet related diseases, we would recommend that the government consider whether the scope should be extended to include PHE salt reduction categories, in line with the launch of a new salt reduction programme.

44. Do you think any of these product categories should not be included? Yes/No. If yes, please explain which product categories and why.

No. We believe that the restrictions should be aligned with current approaches on the NPM, sugar reduction and calorie reduction, and any further exclusions will only serve to confuse the food and drink industry.

Definitions

45. Do you think that the 2004/5 Nutrient profiling model (NPM) provides an appropriate way of defining HFSS products within the food and drink categories proposed for inclusion in this policy (see Annex 4)? Yes/No. If you answered no, what other ways could we use? Please explain your suggestions.

Yes – please see our responses to Q33, 34, 35, 42 & 43. We support the use of the current NPM to define the HFSS products covered by the restrictions, as the established and evidence-based definition for HFSS products that is already well understood and used by food and drink manufacturers, retailers and marketing/advertising professionals in relation to advertising.

However we would like the Government to commit to a timely review of the policy including any further extension to other product categories or in line with any revision of the NPM, no later than 3 years after the introduction of these restrictions.

46. Do you think that micro, small, medium and large businesses should be defined by how many employees they have, as defined in the EU recommendation 2003/361 (see Annex 5)? Yes/No.

Yes, we agree with using existing definitions for business size. However recognising that franchises may be considered to be independently owned businesses, and that some large companies are acquiring franchise chains, we hope Government will ensure that this does not become a means to exempt businesses that are part of a larger food manufacturing or retail empire.

47. Do you think we should consider other ways to define businesses apart from the number of employees, such as floor space/size or turnover? Yes/No. If yes, please explain which methods you think we should consider and why.

No. We believe that it is right to base policy on the size of the business, not the size of the store. We believe that in relation to franchises, the business size should relate to the total number of employees associated with the franchise business, not to individual stores.

Businesses and products out of scope

48. Should the price restrictions apply to Microbusinesses?

Yes. We do not believe it should be difficult for micro business to apply price promotion restrictions as long as they are clearly communicated, but they will need support from manufacturers in terms of removing any relevant volume-based price promotions from product packaging and enough time to sell existing stock.

49. Should the price restrictions apply to specialist retailers who only sell one type of product such as chocolatiers?

We do not see any reason why specialist stores should not be subject to the same price restrictions as other stores. Not to apply them equally may be considered anti-competitive, and just shift purchasing to these retailers.

50. Should the price restrictions apply to products that are non- pre-packaged - we recognise it may be impractical for retailers to apply the restrictions when nutritional information is not displayed on the pack for certain products that are sold loose

Yes, we do not believe that non-prepackaged goods should be exempt from restrictions. Products such as cookies, cakes, pastries are often sold loose, and additional displays promote these offers. Given current public campaigns to remove plastic and excess packaging from products for environmental reasons, and current retailers starting to reinstate packaging free food and drink, we believe that the policy should be defined by the food product nutritional profile itself not by how it is packaged.

51. Should the price restrictions apply to meal deals in the retail or out of home sector?

Yes. We believe the restrictions should apply to meal deals targeted at children, in both retail and the out of home. Action on Salt's survey of salt levels in children's main meals available at popular chain restaurants and fast food outlets operating across the UK found that 41% of meals had more than 1.8g of salt per portion which is the target level of salt for children's meals sold in the out of home sector, as set by Public Health England. Many of these meals were sold as part of a meal deal, with 18 of the 26 outlets (69%) surveyed offering a low cost meal deal to children, typically consisting of a main, side, dessert and drink. This incentivises the purchase of more food and therefore increases the total level of salt, calories and sugar sold to children.

52. Should the price restrictions apply to any other price promotion activity in the out of home sector?

Yes. There is a growing 'eating out' trend in the UK, and we spent an estimated £49bn eating and drinking out, not including alcohol. according to Kantar's 2018 out-of-home report³⁰. Whilst we recognise the Government's intention not to increase the cost of eating out for families, there is a risk that only implementing price restrictions in retail but not out-of-home environments may open up new competitive disadvantages that disincentivise eating at home and family mealtimes too. Furthermore it could undermine efforts at menu reformulation by out of home meal providers. We would like therefore to see the Government commit to developing new evidence and insight on the role of price promotions in the out-of-home and delivery food sectors, and the association of volume-based price promotions and

multi-buy offers (eg. 2 extra-large pizzas for £Y, combination meal deals, and ‘go large/add extra items for just £X’) with excess calorie or sugar consumption leading to overweight and obesity.

53. Should the location restrictions apply to very small stores that do not have distinct checkout, front of store and aisle end areas, even if they are part of a chain?

We accept that very small kiosks may find it hard to implement location restrictions. We also recognise that lower income families are more likely to shop at more local, often smaller stores, and therefore small stores also have an important role to play in tackling obesity, especially given the links between inequality and higher prevalence of overweight and obesity. We would welcome any incentives or investment available to small businesses willing to trial approaches to re-engineering their stores to take HFSS products (and particularly removing sugary drinks, confectionery, crisps and snacks) from checkouts in particular, and trial commercial strategies that rebalance their overall offer towards non-HFSS products and services. For example, the Buywell project Sustain ran with 15 local convenience stores led to an average 60% increase in sales of fruit and vegetable through a series of low cost changes³¹.

54. Should the price restrictions apply to specialist retailers – we recognise it may be impractical for retailers that only sell one type of product to apply the restrictions

Yes, we understand that specialist retailers such as dedicated sweet shops or chocolate specialists may not be able to implement location based promotional restrictions as their whole stores are dedicated to these products, and therefore HFSS products make up all, or almost all of their range. Given people only enter these stores for the explicit purpose of purchasing these products, there is a reasonable case for exemption in relation to location-based promotions only. However they should still be subject to price promotion restrictions and not incentivise multi-buy or ‘extra free’ purchases through price offers such as 3 bars of chocolate for £10, or ‘buy 3, get one free’.

55. Should the price restrictions apply to non-pre-packaged products – we recognise it may be impractical for retailers to apply the restrictions when nutritional information is not displayed on the pack for certain products that are sold loose

Non-pre-packaged goods that fall within the HFSS product category scope should be included in restrictions. Products such as cookies, cakes, pastries are often sold loose, and additional displays promote these offers. Given current public campaigns to remove plastic and excess packaging from products, and return to package free food and drink, we believe that the policy should be defined by the food product nutritional profile itself not by how it is packaged.

Yes/no. Please explain your answer.

56. Are there any other businesses and/or products that should be out of scope of the price and location restrictions? Yes/No. If yes, please explain which businesses and/or products and why.

No.

Policy implementation

57. How much time would businesses need to prepare for implementation? Please explain your answer.

We support a 6-12 month timeframe for implementation, and understand that an extended transition time may be needed for micro-businesses and small independent businesses.

58. DHSC will provide guidance and methodology that will help businesses to know which products can or cannot be promoted. What other support is needed to put this policy into practice?

We believe all policies must be accompanied by enforcement in order to be effective. We believe therefore there should be training offered to those monitoring implementation of restrictions (we assume this will fall under trading standards). We also support the Government operating a system of penalties such as fines for non-compliance with the policy.

59. Would these restrictions cause any implementation or other practical issues for particular businesses that we have not considered in this consultation? Yes/No. If yes, please explain what the likely issues are and provide evidence and suggestions of how the issues could be mitigated for these businesses.

N/A

60. We welcome views through the consultation on possible approaches to enforcement. Do you have any suggestions for how we can enforce the restrictions in a way that is fair to businesses?

We believe that enforcement should be integrated with ongoing trading standards, and local authority teams. Additional funding is likely to be required to enable them to perform this role.

Impact Assessment questions

General IA questions

61. We have calculated illustrative transition costs in both impact assessments. Do these calculations reflect a fair assessment of the costs that would be faced by your organisation/business? Yes/No. If no, please provide any further evidence which could be used to improve our estimates.

N/A

62. Are you aware of any other data sources on sales in the out-of-home food market and the nutritional content of the products sold? Yes/No. If yes, please provide details of the information contained in the data set and the provider.

N/A

63. Are you aware of any other data sources available which would improve our estimates of the number of food retailers and out-of-home food outlets? Yes/No. If yes, please provide details of the information contained in the data set and the provider.

N/A

64. How will these proposals affect the relationships between manufacturers and retailers (e.g. sales agreements, sales targets, the future relationships and

profitability)? Please provide further evidence which could be used to improve our understanding.

N/A

65. Is it reasonable to assume that retailers and out of home businesses are inspected by Trading Standards every 3.5 and 2 years, respectively? Yes/No. If no, please provide further evidence which could be used to improve our estimates.

Yes

66. Is there any additional evidence that would improve our understanding of the level of compensating behaviour which might occur? Yes/No. If yes, please provide further evidence which could be used to improve our estimates.

N/A.

67. Do you have any further evidence or data you wish to submit for us to consider for our final impact assessment or any specific comments on the methodology or assumptions made? Yes/No. If yes, please provide further evidence which could be used to improve our estimates.

N/A

Location restrictions IA

68. Is our assessment of the major supermarkets' approach to placing HFSS food and drinks at checkouts accurate? Yes/No. If no, please provide further evidence which could be used to improve our understanding.

N/A

69. Is there evidence to suggest that smaller retailers are voluntarily restricting the placement of HFSS food and drinks in stores? Yes/No. If yes, please provide further evidence which could be used to improve our understanding.

N/A

70. Is there any additional evidence that would improve our estimates of the use of location promotions within the domestic retail or out of home markets, the sales uplift they provide and proportion of sales they represent? Yes/No. If yes, please provide further evidence which could be used to improve our estimates.

N/A

Price restrictions IA

71. Is it reasonable to assume that businesses will switch to using price cuts instead of volume offers to promote HFSS products? Yes/No. If no, please provide further evidence which could be used to improve our understanding.

There is already evidence that retailers are adopting price cuts and every day low pricing (EDLP) in preference to volume-based multibuy deals, and this is likely to support that trend. However, for maximum impact of promotional restrictions, we believe that price cuts, such as the prevalence of £1 deals, on larger sizes and multipacks of confectionery, crisps, snacks and other HFSS products need to be kept

under scrutiny and consideration for future extension of restrictions, based on evidence that these also contribute to excess sugar, salt, saturated fat and overall calorie consumption.

72. To what extent are price promotions offered in the out of home sector? Please provide evidence which could be used to improve our understanding.

N/A

73. Do consumers respond in a similar way to price promotions offered in the out of home sector and those offered in supermarkets? Please provide further evidence which could be used to improve our understanding.

N/A

74. Is the approach used in the impact assessment suitable for assessing the impact on consumers and specifically for assessing the impact on consumer surplus? Yes/No. If no, please provide further evidence which could be used to improve our estimates.

N/A

75. How would retailers adjust their promotion strategies to meet the 80/20 target?

N/A

Equalities Assessment questions

To assess the potential impact of the policies proposed in Chapter 2 of the Government's Childhood Obesity Plan against the Government's duties under the Equality Act 2010 a separate Equality Analysis has been produced.

76. Do you think that the proposed policy to restrict promotions of HFSS products by location and by price is likely to have an impact on people on the basis of their age, sex, race, religion, sexual orientation, pregnancy and maternity, disability, gender reassignment and marriage/civil partnership? Yes/No. If yes, please explain your answer and provide relevant evidence.

No

77. Do you think that any of the proposals in this consultation would help achieve any of the following aims:

- Eliminating discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010
- Advancing equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it?
- Fostering good relations between persons who share a relevant protected characteristic and persons who do not share it?

No

If you answered yes to the previous question, please explain which aims it would help achieve and how.

N/A

78. If you answered no to the previous question, could the proposals be changed so that they are more effective? If yes, please explain what changes would be needed.

N/A

79. Do you think that the proposed policy to restrict promotions of HFSS products by location and by price would be likely to have an impact on people from lower socioeconomic backgrounds? Yes/No. If yes, please explain your answer and provide relevant evidence.

Sustain runs a number of projects which focus on alleviating food poverty i.e. trying to improve the ability for those on a low income to access and afford healthy food, most notably we are a founding member of the UK Food Poverty Alliance, part of End Hunger UK, and run the Food Power network which supports over 40 local alliances across the UK trying to tackle this issue.

It is worth noting in this regard, that these proposals relate to HFSS products, rather than healthier family staples, which are most important to those seeking affordable food.

Evidence from Cancer Research UK's analysis of Kantar Worldpanel data shows that the association between overweight and obesity and promotional purchasing was seen in all income groups, and that regardless of demographics people who spend more on promotions are also less likely to purchase healthier foods³². Evidence shows that higher income groups show higher promotional purchasing than the lowest income group. Evidence from both sales data and PHE's studies on price promotions of sugary products indicate that price promotions do not save people money, but often cause them to spend more. This is particularly true of promotions that trigger impulse purchasing (such as in-store displays linked to offers) or encourage shoppers to trade up to larger volume purchases (such as multibuy deals), and therefore can lead to overconsumption. Therefore we do not believe there would be any adverse effect on people from lower socio-economic backgrounds from introducing the restrictions proposed.

The evidence around price reduction promotions on HFSS produce, not in the scope of the Government proposals, warrants further research, particularly on how these impact on purchasing and consumption behaviour for lower income households working to a tight budget.

Further points

80. Is there anything else that you would like to tell us or any more information that you would like to provide for this consultation?

Many of the promotions discussed in this consultation are often supported by in-store signage, A-boards immediately outside store entrances and window displays. Sustain has been working with Food Active to explore physical advertising of HFSS produce, produced within put from local councils and communities across the UK. One of the areas identified by this project is the lack of clarity over advertising/signage inside, and within the periphery of, food outlets – both retail and out of home. Local authority powers to restrict A- Boards for example outside of outlets are limited, or would require an overly complex, impractical and heavy handed approach that would require requesting a derogation of powers from national government. This type of advertising to be out-of-scope of current CAP rules on non-broadcast advertising of HFSS products to under-16s, and therefore there is a significant loophole in current rules, which means the ASA cannot consider complaints on adverts for

HFSS products within these environments, even within the current limited scope of such advertising by stores being placed within 100m of a school. Sustain's forthcoming report shows the need to close this loophole and clarify the rules around advertising and promotion on HFSS produce in these locations. As a first instance we believe it is within the scope of this consultation for the proposed restrictions on promotions to apply to advertising (of these promotions) within/outside these outlets.

We are concerned that if displays are not allowed in prominent locations, there will be an upsurge of in-store posters and signage to where these product offers might be found, to encourage people to seek them out.

About the Children's Food Campaign: Children's Food Campaign (CFC) aims to improve children and young people's health by campaigning for policy changes in our schools, in our communities and throughout our society that would promote healthy and sustainable food environments. It is a project of charity Sustain: the alliance for better food and farming. Children's Food Campaign is supported by over 100 UK-wide and national organisations, including children's and health charities and professional bodies, trade unions, school food experts and environmental organisations.

About Sustain: the alliance for better food and farming. Sustain advocates food and agriculture policies and practices that enhance the health and welfare of people and animals, improve the working and living environment, enrich society and culture and promote equity. We represent around 100 national public interest organisations working at international, national, regional and local level. Sustain coordinates the Children's Food Campaign, and the Sugar Smart campaign. We work with our members and others to promote integrated healthy and sustainable policies and practices for food, farming and fishing.

¹ <https://www.spar.co.uk/about-spar>

² <http://www.nisalocally.co.uk/stores>

³ <https://www.co-operative.coop/media/news-releases/co-op-completes-acquisition-of-nisa-retail-limited>

⁴ https://www.acs.org.uk/sites/default/files/lobbying/acs_submission_-_nisa_co-op_2018.pdf

⁵ <http://www.foodactive.org.uk/wp-content/uploads/2019/03/Strand-1-High-Street-Food-Placement-Project-Strand-One-Final-Report-March-20191.pdf>

⁶ Research conducted via SurveyMonkey, open 4 Feb-15 March 2019. Parents recruited via membership networks of Children's Food Campaign and Parents' Jury. Not weighted to be demographically representative, but done on purely voluntary opt-in basis. Full results available on request.

⁷ <https://www.igd.com/about-us/media/press-releases/press-release/t/uk-food-and-grocery-market-to-grow-148-by-282bn-by-2023/i/19052>

⁸ <https://www.mintel.com/press-centre/retail-press-centre/online-grocery-clicks-in-the-uk>

⁹ Research conducted via SurveyMonkey, open 4 Feb-15 March 2019. Parents recruited via membership networks of Children's Food Campaign and Parents' Jury. Not weighted to be demographically representative, but done on purely voluntary opt-in basis.

¹⁰ Public Health England, Sugar Reduction: The Evidence for Action 2015, Annexe 4: An analysis of the role of price promotions on the household purchases of food and drinks high in sugar. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/470179/Sugar_reduction_The_evidence_for_action.pdf

¹¹ https://www.cancerresearchuk.org/sites/default/files/paying_the_price_-_full_report.pdf?utm_source=twitter_crukpolicy&utm_medium=cruksocialmedia&utm_campaign=CRUKpolicy

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- ¹² <https://www.independent.co.uk/news/business/news/sainsburys-first-supermarket-to-say-bogof-to-multi-buy-deals-a6867696.html>
- ¹³ <http://obesityhealthalliance.org.uk/wp-content/uploads/2018/11/Out-of-Place-Obesity-Health-Alliance-2.pdf>
- ¹⁴ <https://inews.co.uk/news/health/supermarkets-discounts-unhealthy-food-obesity-which/>
- ¹⁵ Hawkes, Corinna. Sales promotion and food consumption. Nutrition Reviews 2009. https://www.researchgate.net/publication/26285775_Sales_promotions_and_food_consumption
- ¹⁶ Cancer Research UK, Paying the Price, March 2019. https://www.cancerresearchuk.org/sites/default/files/paying_the_price_-_full_report.pdf?utm_source=twitter_crukpolicy&utm_medium=cruksocialmedia&utm_campaign=CRUKpolicy
- ¹⁷ <http://www.foodactive.org.uk/wp-content/uploads/2019/02/Food-Active-Price-Promotions-on-Less-Healthy-Food-and-Drink.pdf>
- ¹⁸ <https://www.telegraph.co.uk/news/2018/01/26/calls-sharing-bags-sweets-banned-people-eat-one-go/>
- ¹⁹ <https://www.pizzahut.co.uk/restaurants/food/kids-menu/>
- ²⁰ Action on Salt (2019). <http://www.actiononsalt.org.uk/media/action-on-salt/FINAL-Survey-Report.pdf>
- ²¹ DHSC Restricting checkout, end-of-aisle, and store entrance sales of food and drinks high in fat, salt, and sugar (HFSS) Impact Assessment https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770706/impact-assessment-restricting-checkout-end-of-aisle-and-store-entrance-sales-of-HFSS.pdf
- ²² Cohen D and Lesser L, Obesity Prevention at the point of purchase. Obesity Reviews 2016. <https://www.ncbi.nlm.nih.gov/pubmed/26910361>
- ²³ <https://www.cedar.iph.cam.ac.uk/removing-sweets-and-crisps-from-supermarket-checkouts-linked-to-dramatic-fall-in-unhealthy-snack-purchases/>
- ²⁴ <http://www.healthscotland.scot/media/1611/rapid-evidence-review-restriction-of-price-promotions.pdf>
- ²⁵ <http://www.foodactive.org.uk/wp-content/uploads/2019/02/Food-Active-Price-Promotions-on-Less-Healthy-Food-and-Drink.pdf>
- ²⁶ <https://journals.plos.org/plosmedicine/article?id=10.1371/journal.pmed.1002712>
- ²⁷ Out of Place, Obesity Health Alliance, 2018. <http://obesityhealthalliance.org.uk/wp-content/uploads/2018/11/Out-of-Place-Obesity-Health-Alliance-2.pdf>
- ²⁸ <http://www.foodactive.org.uk/wp-content/uploads/2019/03/Strand-1-High-Street-Food-Placement-Project-Strand-One-Final-Report-March-20191.pdf>
- ²⁹ <https://www.thegrocer.co.uk/store-design-old/tesco-pilots-first-cashless-store-and-amazon-go-style-payment/568770.article>
- ³⁰ <https://uk.kantar.com/consumer/shoppers/2018/the-uk-spent-over-£49bn-on-eating-and-drinking-out-last-year/>
- ³¹ Buywell Project, Sustain. https://www.sustainweb.org/publications/buywell_retail_project_final_report/
- ³² Cancer Research UK, Paying the Price, March 2019 https://www.cancerresearchuk.org/sites/default/files/paying_the_price_-_full_report.pdf