



Our Position on Tackling Promotions

The Alliance firmly believes that tackling promotions is a key action that needs to be implemented to help tackle the challenge of overweight and obesity in Scotland. In this position statement we outline the measures that we collectively identify as crucial to ensuring successful action. These steps will help see that all people have access to healthy food and achieve the commitment to halve child obesity by 2030.

Types of Promotions

The Alliance believes price and non-price promotions on High Fat Salt and Sugar (HFSS) products should be restricted through regulation by the introduction of a Scottish Parliament Bill.

Price Promotions

The Bill should enable restriction across all types of price promotions including temporary price reductions, multi-buys and extra free on HFSS products. A phased approach to regulation could prioritise the restriction of multi-buys but the Bill should enable all types of price promotion to be tackled in the future.

Research by Cancer Research UKⁱ, based on Kantar WorldPanel purchasing data from 2017, identified that people who buy a high proportion of their food on promotion buy a significantly higher quantity of HFSS food and drink and much less fruit and vegetables, than people who buy little on promotion. Multi-buy and extra free promotions encourage over-consumption by normalising the purchase of more of these products. Price promotions drive unplanned purchases of additional less healthy food and drinks.

Temporary price reductions (TPRs) are the most commonly used price promotion in retail in Scotland, across all categories of food and drink, with more than 26% of all calories purchased in 2016 coming from this type of promotion – a rise of 5% since 2010ⁱⁱ.

Non-price promotions

The Bill should enable restriction across the types of location promotions and non-price promotions that are used to influence purchasing patterns of HFSS products. Location and non-price promotions also have a substantial effect on purchasing habits.

- End of aisle displays can significantly increase purchases of alcoholic and non-alcoholic beveragesⁱⁱⁱ.
- In 2018, the Obesity Health Alliance surveyed food and drink product placement within 5 supermarkets in England. They included products highlighted in PHE sugar and calorie reduction programmes, as well as drinks included in the soft drinks industry levy. They found that sugary food and drinks made up 43% of all food and drink displayed in prominent areas e.g. checkouts and end-of-aisles^{iv}.
- Of all food and drink located in prominent areas, 42% were targeted by the PHE sugar reduction programme and 27% were in the calorie reduction programme^v.
- In contrast, fruit and vegetable placement in prime locations was less than 1%^{vi}.
- A recent study of food purchased from checkout areas of 9 UK supermarkets found those with checkout food policies had an immediate 17% fall in sugary confectionary, chocolate, and potato crisps purchased. Although not causal in nature, the results suggest that placement of foods in key locations does impact consumer habits^{vii}.
- In the Out of Home sector, foods placed beside till areas are more likely to be high in sugar, such as sweets, cakes and biscuits. ‘Upselling’ also occurs regularly, most often in the form of meal deals. As less healthy options are offered as part of meal deals, this can make it more difficult for the consumer to make healthy choices, leading them to purchase and consume more than they had planned^{viii}.

Because of these reasons there must be robust and ambitious legislation that reshapes the food environment and helps people and their families live a healthier life. The Alliance believes there should be a blanket implementation of this policy on all premises to ensure that there is a level playing field including in the out of home sector. We are keen to avoid exemptions to ensure this policy is as effective as possible in changing food environments across Scotland. However we recognise that there are some outlets where it may be impossible to restructure the retail environment to ensure compliance. We would anticipate such premises to be very limited in number.

The Scottish Government must set strict limits to ensure that exemptions are only where absolutely necessary. We urge the Scottish Government to ensure that the range of exemptions for certain retail outlets is limited. Wherever possible, such outlets should be encouraged and supported to enable compliance or to ensure effective alternative actions.

Type of premises

The Alliance believes that proposed measures to restrict promotions should be applied in retail, out of home and the corresponding online environments.

The Online Retail Environment

Legislation must also apply online as a substantial proportion of groceries are bought online in the UK. A Kantar Worldpanel^{ix} report published in 2015 revealed the UK trend of continued growth of online retail, which then accounted for 6.3% of grocery sales.

In 2016, UK was the world third-largest adopter of online grocery shopping, only behind South Korea and Japan, with the increase to 6.9% global market value. In 2017 the online share of the UK grocery market increased again to 7.5% and Kantar Worldpanel^x predicted that by 2025 it would reach 12%.

Convenience is one of the strong drivers of online sales. According to the Online Shopper Intelligence report from Kantar Media^{xi}, key motives for online grocery shopping are: the ability to shop at any time (60%), having groceries delivered to the door (58%), and the avoidance of carrying home heavy items (55%). Another report from the Kantar Worldpanel^{xii} suggests possible ways of increasing online sales by deliveries to tube stations, or click and collect to local stores. Retailers have been aware of the direction of change and will be ready to actively adapt their selling techniques online. Therefore, the same restrictions on promotion of the targeted foods should be applied online. There should be no exemptions.

Defining High Fat Salt and Sugar products on Promotion

The Alliance believes the UK Nutrient Profile Model (UKNPM) provides a good foundation to define HFFS products. While the 2003/4 version of the UKNPM is a workable option, we believe that the Scottish Government should adopt the forthcoming update version of the UKNPM as soon as it is viable after launch. This is because it is most reflective of the latest scientific evidence.

Within its approach we suggest that the Scottish Government should give due consideration to an approach where certain categories of discretionary foods have no thresholds applied and a whole category restriction applies.

We recognise that due consideration needs to be given to similar proposals being developed by the UK Government. Alignment should be sought wherever practical, however this should not lead to delay of Scottish legislation or weakening of proposals for Scotland. We need to see bold and ambitious action implemented if we want to achieve the necessary change in the food environment.

Changing the Balance

The current obesogenic environment makes it difficult for people of all ages to make healthy choices. Urgent action is needed to ensure that there is a greater proportion of healthy products on promotion and a smaller proportion of unhealthy, across the retail and out-of-home sector. This should involve exploring innovative means of encouraging retailers and manufacturers to promote healthier goods, in addition to restricting the promotion of less healthy products.

The Alliance has identified that some evidence exists on ways of encouraging healthier food promotions, but that it is not been examined in any great detail. We ask that the Scottish Government commits to identifying and examining the evidence on enabling healthier promotions and the effects on behaviour and diet. We would be happy to support any activity in this area.

Exemptions

The Alliance believes there should be very few exemptions in the framework Bill.

In the UK Department of Health and Social Care (DHSC) consultation on promotions it is proposed to exempt micro-businesses from these restrictions. The Scottish Obesity Alliance is very concerned by this proposal. We understand the implementation of change will be tougher on smaller businesses and we therefore ask the Scottish Government to provide the resource and time if necessary to support those businesses rather than an exemption. The DHSC impact assessment^{xiii} itself indicates that 75% of businesses in the out of home sector affected by any restrictions are micro businesses. Evidence and experience suggests that these are most likely to be located in more deprived communities, and are also likely to be the types of premises that school children will use at lunchtimes. Exempting such premises could potentially lead to a widening inequalities gap in diet and obesity and leave young people unable to access healthy options. We support the position of the Scottish Government in including micro-businesses but offering additional support and resource to enable them to comply with any legislation.

Finally, the proposed restrictions should apply all the time with no seasonal exceptions. Research published by Food Standards Scotland showed that there is currently a large uplift in calories purchased from some of the discretionary food categories over the festive season^{xiv}.

About the Scottish Obesity Alliance

The Scottish Obesity Alliance brings together organisations to collectively advocate for improved policy and practice on obesity prevention in Scotland.

Our memberships consists of leading national health charities, medical royal colleges, campaign groups and professional and academic groups who have an interest in reducing rates of obesity and overweight in Scotland.

www.scottishobesityalliance.org

ⁱ CRUK (2019) Paying the price: New evidence on the link between price promotions, purchasing of less healthy food and drink, and overweight and obesity in Great Britain. Available from

https://www.cancerresearchuk.org/sites/default/files/paying_the_price_-_full_report.pdf

ⁱⁱ Food Standards Scotland (2016) Foods and drinks purchased into the home in Scotland using data from Kantar WorldPanel. January 2016

ⁱⁱⁱ University of Cambridge (2014) End-of-aisle displays encourage consumption of alcohol and fizzy drinks. Available from

<https://www.cam.ac.uk/research/news/end-of-aisle-displays-encourage-consumption-of-alcohol-and-fizzy-drinks>

-
- iv Obesity Health Alliance (2018) Out of place: The extent of unhealthy foods in prime locations in supermarkets. Available from <http://obesityhealthalliance.org.uk/wp-content/uploads/2018/11/Out-of-Place-Obesity-Health-Alliance-2.pdf>
- v Public Health England (2014) Sugar Reduction Programme: Progress made by industry in the first year. Available from <https://publichealthengland.exposure.co/sugar-reduction-programme>
- vi *ibid.*
- vii Ejlerskov KT, Stead M, Adamson A, White M, Adams J. (2011) The nature of UK supermarkets' policies on checkout food and associations with healthfulness and type of food displayed: cross-sectional study. *Int J Behav Nutr Phys Act.* 2018;15(1):52. Published 2018 Jun 11. Available from <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5996483/>
- viii Gorski MT, Roberto CA. (2015) Public health policies to encourage healthy eating habits: recent perspectives. *J Healthc Leadersh.* 2015;7:81-90. Published 2015 Sep 23. Available from <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5740998/>
- ix McKeivitt, Fraser (2016) UK leads as third-largest adopter of online grocery shopping. 30/09/2016 Available from: <https://uk.kantar.com/consumer/shoppers/2016/kantar-worldpanel-ecommerce-grocery-market-data/>
- x McKeivitt, Fraser (2017) Online FMCG sales up 7.6% in UK. In in the online Kantar Worldpanel news centre. 21/11/2017. Available from <https://www.kantarworldpanel.com/en/PR/Online-FMCG-sales-up-76-in-UK>
- xi Radcliffe, Jeremy (2012) Why shop for groceries online? Available from: <https://uk.kantar.com/consumer/shoppers/convenience-tops-list-of-reasons-for-online-grocery-shopping/>
- xii Kantar Worldpanel (2015) The Great Grocery Revolution. What is really happening to Britain's supermarkets? Thoughts on... series. Available from <https://www.kantarworldpanel.com/global/Reports>
- xiii https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770705/impact-assessment-for-restricting-volume-promotions-for-HFSS-products.pdf
- xiv Food Standards Scotland (2016) Foods and drinks purchased into the home in Scotland using data from Kantar WorldPanel. Available from [https://www.foodstandards.gov.scot/downloads/Food and Drinks Purchased into The Home in Scotland report.pdf](https://www.foodstandards.gov.scot/downloads/Food_and_Drinks_Purchased_into_The_Home_in_Scotland_report.pdf).