



# OBESITY AND PROMOTIONS OF HFSS PRODUCTS

## Key Points

- » Individuals purchase more as a direct result of promotions, with a greater proportion spent on discretionary food categories. Together with advertising, promotions are the most pertinent form of marketing to young people
- » The majority of price promotions in Scotland feature unhealthy products high in fat, sugar and salt (HFSS)
- » The intent for legislation in Scotland has been voiced by the Scottish Government since 2018 but work on this was paused during the COVID-19 pandemic. A consultation on restricting price promotions of HFSS products was undertaken in 2022 and a commitment in the Programme for Government for a Bill to be introduced by mid-2023
- » In 2021, the Food (Promotion and Placement) (England) Regulations 2021 brought into law powers to restrict location and multi-buy deals on HFSS products in England. Location restrictions on promotions came into force in England on 1st October 2022 however the implementation date for restrictions on price promotions have now been delayed until 1st October 2023
- » Regulation of price and location promotions of HFSS products is urgently required, in order to protect children from excess calories and create a consistent, sector-wide level playing field
- » Given the significant economic costs associated with overweight and obesity, there is a clear economic case for investment in improving the health of individuals

## Key Recommended Actions

Legislation must be introduced in Scotland to effectively restrict all types of promotions of HFSS products including:

- » Price promotions (i.e. temporary price reductions, multibuy and others)
- » Non-price promotions (location-based promotions), especially those in the most frequently visited and seen locations in-store and online
- » These measures must apply to both in-store and online locations of retail and out of home (OOH) sector to ensure consistency in all food environments
- » Businesses must be enabled, encouraged and incentivised to increase the amount of healthy foods on promotion



## DEFINITIONS

**Marketing** The activity, set of institutions, and processes for creating, communicating, delivering, and exchanging offerings that have value for customers, clients, partners and society at large.<sup>1</sup>

**Promotions** A form of marketing, the publicising of a product, organisation, or venture so as to increase sales or public awareness.<sup>2</sup>

**Price promotions** Refers to special offers where there is a reduction in the usual price of a product which may be time-limited or conditional on another requirement such as purchasing another item. This can usually take one of three forms such as: a temporary price reduction (TPR), multi-buy or extra free.<sup>3</sup>

» **Temporary price reduction (TPR)** Short term reductions in the price of food and drink products, running offers on specific items for 2-5 weeks.<sup>4</sup>

» **Multibuy** Requires more than one pack to be purchased in order to benefit from a discounted price. This includes 'buy one get one free' '3 for 2' '3 for £10' and can vary from short to long term in duration.<sup>4</sup>

» **Extra free** As defined by Public Health England (2020), this occurs when an 'enlarged pack size is created by the manufacturer, where the pack label states that a proportion of the product is free, for instance an extra-large packet stating 50% extra free.'<sup>4, 5</sup>

**Non-price promotions** Defined by the Scottish Government as 'placement of products in prominent locations, including checkouts and end of aisles, in-store marketing purchase rewards and coupons.'<sup>3</sup>

**HFSS food and drink** Food and drink items which are high in fat, sugar and salt.<sup>6</sup>

**Less healthy food** Categories as defined by Food Standards Scotland (FSS): regular soft drinks, biscuits, cakes and pastries, confectionery, pies and pasties, sausages, crisps and savoury snacks, puddings and deserts, ice cream and edible ices and frozen dairy desserts.<sup>7</sup>

**Discretionary food** A term introduced by Food Standards Scotland. Foods which are optional in the diet, and have little or no nutritional benefit and include confectionery, sweet biscuits, savoury snacks, cakes, pastries, puddings and sugar containing soft drinks.<sup>7, 8</sup>

## PROMOTIONS IN SCOTLAND

**In Scotland, discretionary foods and drinks (such as cakes, biscuits, pastries, cakes, crisps, savoury snacks, puddings, ice creams and soft drinks) contribute significantly to the Scottish diet, particularly towards calories (24%), total fat (25%), saturated fat (28%), total sugar (37%) and sodium (11%)<sup>7</sup>. Within retail environments particularly, price promotions feature significantly within the grocery landscape, encouraging impulse purchasing, responsible for an increase in the volume of food we buy<sup>4</sup>.**

The latest data highlights that individuals purchase 20% more as a direct result of promotions<sup>9</sup>, with a greater proportion spent on discretionary food categories (36.9%), compared to non-discretionary categories (24.7%)<sup>10</sup>. The most frequently promoted discretionary products include confectionery, crisps, ice cream and dairy desserts, and soft drinks<sup>11</sup>. Crisps and savoury snacks are the most frequently purchased discretionary item on price promotion (43.1%) compared to other categories<sup>10</sup>.

Temporary price reductions (TPRs) are the most frequently used type of price promotion in Scotland accounting for 23% of all calories purchased<sup>12</sup>, with 43% of individuals reporting that TPRs caused them to make impulsive purchases<sup>13</sup>. It is clear that TPRs have a significant impact on overall calorie consumption as a 613-calorie reduction per person per week, as presented in an economic modelling study by the Scottish Government, could be achieved if all types of price





promotions were restricted on discretionary products, as opposed to only 115 calories per person per week if only multi-buys were restricted <sup>14</sup>. Further, TPRs are the most commonly used type of promotion online. In our [Survey of Food and Drink Promotions in an Online Retail Environment](#), we found that TPRs accounted for 57% of

price promotions online, with the majority of these being for discretionary HFSS items <sup>11</sup>. Additionally, TPRs are also the most commonly used type of price promotion during the festive and other seasonal periods. Research finds a significant increase in calories purchased and consumed during these times <sup>15</sup>.



## WHY IS THIS AN IMPORTANT ISSUE TO ADDRESS?

Promotions in the UK now account for 34% of take-home food and drink expenditure<sup>4</sup>, and 27.3% of total take-home food and drink in Scotland<sup>10</sup> encouraging individuals to buy more, regardless of income status and demographic group<sup>5</sup>. Evidence from Cancer Research UK<sup>16</sup> suggests that three in ten food and drink items are purchased on promotion in the UK encouraging unnecessary, unplanned and unhealthy purchases that wouldn't have been made if the promotions weren't there, increasing spending by around 22%<sup>17-20</sup>. Additionally, consumers often purchase more of a category than normal, increasing their overall level of take-home food and drink being purchased, with little evidence to show that increased purchasing of one category leads individuals to make a reduction in other food categories such as foods high in sugar<sup>4, 21</sup>. In Scotland, 32% of calories were purchased on price promotion in 2018<sup>12</sup>.

Furthermore, new research highlights that buyers are more responsive to price promotions on unhealthy food<sup>22</sup>, purchasing a less healthy balance of nutrients<sup>17</sup>, such as around a fifth more HFSS products, and less fruit and vegetables than low promotional shoppers<sup>16, 23</sup>. Consumers who make these extra promotional purchases do not stockpile them but instead increase their consumption in a short space of time<sup>9, 24</sup>. Research by Food Standards Scotland (2021) found that along with cost and time, promotions on less healthy items were a key barrier to healthy eating for individuals<sup>25</sup>.

Promotions appear more commonly on unhealthier food items and are more likely to be deeply promoted on products where sugar is added than on products where sugar is naturally present such as milk, fruit and vegetables, with the exception of fruit juice<sup>4, 24</sup>. 8.7% of all take home sugar “is an incremental consequence of promotions” with 6% coming from the higher sugar categories. If higher

sugar category promotions were reduced to zero, a 6.1% saving in sugar volume could be achieved, or 7.4g of sugar per individual per day<sup>4</sup>. Furthermore, findings from one study<sup>22</sup> found that banning promotions on sugar-sweetened beverages was more effective to consumers than taxing soft drinks. The study highlighted that for the average household, banning promotions on soft drinks would reduce annual sugar consumption per person by 9.1% which is equivalent to 0.85kg loss of body weight.

Price promotions are one of the most commonly used marketing strategies in the Out of Home sector in Scotland<sup>25</sup>. As most foods purchased when eating out are discretionary foods, targeting price promotions in this sector could lead to a decrease in consumption of these foods and offer the potential to improve food choices<sup>26</sup>.

# WHY ADDRESS NON-PRICE PROMOTIONS?



Supermarkets use many different combinations of price and non-monetary promotions, highlighting that various combinations work<sup>11</sup>.

Where products are placed in supermarkets has a significant influence on consumer purchases. Research by the Obesity Health Alliance (2018)<sup>20</sup> found that 43% of all food and drink products featured in prominent locations such as end of aisles, checkouts and free-standing displays

were for HFSS products, with less than 1% of healthier foods such as fruit and vegetables being promoted in similar high-profile locations. A study from the University of Cambridge (2018)<sup>27</sup> found there were 76% fewer purchases of sugary confectionery, chocolate and crisps from supermarkets who removed sweets and crisps from checkouts compared to those supermarkets without this policy in place.

Additionally, 17% fewer of these items were purchased and taken home immediately after this policy had been introduced. Similarly, a study undertaken in 2021 found that the removal of unhealthy foods from checkouts and end of aisle positions contributed to around 1,500 fewer portions of confectionery being sold each week<sup>28</sup>. These results suggest that placement of food in key locations does impact upon consumer habits.

'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<sup>25</sup>.

## THE NEED TO REGULATE

Voluntary agreements were previously introduced through the 2011 **Public Health Responsibility Deal (RD)** in England and the **Supporting Healthy Choices** framework in Scotland which was introduced in 2014, yet they have not produced the results required to have a significant impact on consumer purchasing behaviour. Voluntary agreements do not work and regulation is needed in the form of legislation in order to restrict price and location promotions of discretionary HFSS products.

## PUBLIC ATTITUDES

Recent polling results highlight not only a high level of support for restrictions on price and location promotions on HFSS products, but crucially low levels of opposition for these restrictions too<sup>a</sup>. 57% of respondents supported the restrictions of price promotions of unhealthy foods in shops and online, with 26% opposing these restrictions. Similarly, 65% supported measures to restrict where such foods could be displayed in stores, with 15% of respondents opposing this. Furthermore, the vast majority of respondents (87%) supported interventions to ensure special offers and promotions are applied to healthy foods and everyday essentials when shopping in-store and online. Only 5% of respondents opposed these measures.

These findings are supported by further surveys. In 2021, Food Standards Scotland published Wave 12 of their Food in Scotland Consumer Tracking Survey<sup>30</sup> which highlighted that, out of 1,029 Scottish adults, 51% supported a ban of promotional offers on HFSS foods and 31% supported better promotion of healthy options. Additionally, 69% agreed that unhealthy foods were promoted more often than healthier foods.

Further polling found 76% agreed that multi-buy offers encourage unhealthy food consumption and 59% support restrictions on multi-buy promotions of high calorie food<sup>20</sup>. Similarly, polling from the Food Foundation (2022)<sup>18</sup> suggests individuals want promotions on core

essentials, rather than unhealthy foods. 81% of respondents stated they would find supermarkets putting essential products on promotion helpful.

<sup>a</sup> OAS recently commissioned Diffley Partnership to carry out public polling on various policy interventions.

Over 1,000 people responded to the survey which was conducted between 24th-26th August 2022 in Scotland.

The results largely showed support for a number of policy measures which would allow people in Scotland to eat a healthier diet.<sup>29</sup>







## CURRENT POLICY POSITION

The intent for legislation in Scotland has been voiced by the Scottish Government since 2018. Following a consultation held by the Scottish Government from October 2018 - January 2019 on the restriction of HFSS product promotions, it was subsequently announced in September 2019 the intention to introduce restrictions on a range of price and location promotions, including multibuy (Buy One Get One Free and Extra Free), location promotions such as end of aisle and shelf displays, and instore advertising<sup>3, 31, 32</sup>.

However due to the COVID-19 pandemic, the Scottish Government paused the legislation citing the unprecedented challenges on the Scottish food and drink retail industry, with plans to implement the restrictions once the economic challenges of the pandemic had lessened. The 2022/23 Programme for Government<sup>33</sup> included a commitment to introduce a Public Health (Restriction of Price Promotions) Bill which will include restrictions on the promotion of HFSS foods. The Scottish Government held a new consultation on restricting promotions of HFSS foods, which closed on the 23rd September 2022<sup>34</sup>.

We have published our [final response to the consultation](#). Whilst there is a lot to welcome and support within the proposals, there are also areas where we want to see further action, or the action originally proposed in 2018.

The **UK Government's Department of Health and Social Care** launched a consultation in January 2019<sup>35</sup> focusing on price and location promotions of HFSS products in England. The proposals within this consultation aimed to reduce overconsumption of HFSS products in children, whilst encouraging promotions on healthier options, making it easier for families to make healthier choices. Following this consultation, legislation was introduced The Food (Promotion and Placement) (England) Regulations 2021 to restrict the promotion of HFSS products by volume price and location, online and instore in England. Location restrictions on promotions came into force on 1 October 2022 however restrictions on price promotions have now been delayed until 1st October 2023 through the updated Food (Promotion and Placement) (England) (Amendment) Regulations 2022<sup>36, 37</sup>.

The **Welsh Government** launched two consultations in June 2022, as part of its focus on obesity prevention. The **'Healthy Food Environment'** consultation comprises of three main themes including – promoting healthy food choices, improving consumer information and promoting positive choices of food in the out of home sector. Whilst there is no deadline for the introduction of the proposals after the consultation period (September 2022), the Welsh Government aims to achieve the goals of its strategy by 2030<sup>38, 39</sup>.



Table 1

## Details of the Scottish, Welsh and UK Government's promotions restrictions of HFSS products

Country	Stage of Implementation	Summary of extent
Scotland	In the 2022-23 Programme for Government, the Scottish Government committed to bring forward legislation during this Parliament, to restrict the promotions of HFSS products – Public Health (Restriction of Promotions) Bill. A new consultation on this topic was held, which closed on the 23rd September 2022	Price promotion restrictions: multibuy, unlimited amounts for a fixed charge, temporary price reductions (TPRs), meal deals  Location based promotions; checkout areas including self-service, end of aisle, front of store – store entrances and covered outside areas connected to shopping area, island/bin displays  Would also apply to the equivalent locations online; home and checkout
England	Legislation has been introduced The Food (Promotion and Placement) (England) Regulations 2021 to restrict the promotion of HFSS products by volume price and location, online and in-store  Restrictions on location promotions came into effect on 1st October 2022 and apply to both physical and online retailers  Introduction of restrictions on price promotions have been delayed until 1st October 2023 through the updated Food (Promotion and Placement) (England) (Amendment) Regulations 2022	Price promotion restrictions: volume price promotions (multibuy offers such as buy one get one free, buy 2 for £X and extra free offers)  Location based promotion restrictions include: store entrances, aisle ends and checkouts and online equivalents (entry pages, landing pages and shopping basket or payment pages)
Wales	The Welsh Government are currently consulting on HFSS restrictions as a two-stage process. The first consultation closed in September 2022, with additional evidence gathering around implementation taking place during Winter 2022. There are currently no set timescales for the introduction of the proposals after the consultation	Price promotion restrictions: value-based promotions; temporary price reductions, multibuy, volume offers  Location-based promotions restrictions; store entrances, till points, end of aisles, free standing display units







## HOW COULD THE RESTRICTION OF PRICE PROMOTIONS OF HFSS PRODUCTS HELP?

Promotions encourage impulse purchases and successfully influence unconscious decision-making<sup>4, 20</sup>. In order to improve the health of the nation and reduce obesity rates, the consumption of discretionary food and drink needs to be reduced. At the moment, discretionary foods contribute significantly to total calories, sugar and fat consumed, with the purchase of food and drink on price promotion 'continuing to be skewed towards less healthy categories'<sup>25</sup>. Therefore, restricting promotions of HFSS products would result in a reduction in the purchasing of excess HFSS products<sup>40</sup>.

Research from Public Health England (2020)<sup>41</sup> Sugar Reduction programme report highlights that some sugar categories are showing little progress in product reformulation, together with increasing volume sales (increase of 16.3% for chocolate confectionery). This therefore strengthens the need for change through limiting the promotion of high sugar foods<sup>42</sup> to encourage healthier eating and reduce obesity<sup>21</sup>. A promotions-based intervention could have influence across the population as all demographic groups make use of price promotions<sup>16, 25</sup>.

The economic costs associated with obesity are high. The annual cost of obesity to the NHS in Scotland is estimated to reach £600 million per year. The wider economic costs are even bigger, at between £0.9 and £4.6 billion each year<sup>31</sup>. In 2014 to 2015, £6.1 billion was spent in the UK on treating obesity-related ill health which is forecast to rise to £9.7 billion per year by 2050<sup>43</sup>.

<sup>44</sup>. Furthermore, obesity costs wider society an even larger sum at £27 billion which is expected to rise to almost £50 billion per year<sup>43</sup>. The indirect economic costs of those living with overweight and obesity in the UK including early retirement, efficiency at work and prospects



of promotion, is estimated to be equivalent to 3% of gross domestic product (\$73billion) and estimated to account for 60% of the total costs of being overweight or having obesity<sup>45</sup>. Analysis from the McKinsey Institute,

takes into account loss of productivity attributable to loss of life or impaired life quality, direct health care costs and investment to mitigate the impact of obesity<sup>46</sup>.

Furthermore, the global economic impact of overweight and obesity in 2019 was estimated at 2.19% of global gross domestic product (GDP)<sup>47</sup>. If these trends continue, the worldwide economic impacts of overweight and obesity by 2060 are projected to rise to 3.29% of GDP globally<sup>47</sup>. Given such significant economic costs, there is a clear economic case for investment in tackling overweight and obesity.

Further economic analysis published in the McKinsey report found that implementation of a regulated price promotion intervention in the UK has the potential to both be cost-effective and have a high impact on obesity<sup>46</sup>. Researchers estimated that implementation could save 561,000 DALYs, at a cost of \$200 per DALY saved. This would be considered cost-



effective from a societal viewpoint, meaning that over the lifetime of the population targeted restrictions, the amount of money saved from the reduction of obesity, e.g. in healthcare, will be more than the cost of implementing the intervention.

The UK Government's Impact Assessments<sup>19, 48</sup> evaluated the cost of implementing the preferred option in England for both the restriction of volume promotions and location promotions over a 25-year period, assuming a 40% calorie compensation. The consideration of **'calorie compensation'** makes the calculation more realistic, as it cannot be assumed that the restrictions would lead to people completely cutting out the calories associated with price promotions, as they may 'compensate' for them by consuming other food and drink. The savings on applying restrictions on volume promotions in England are estimated

to total £3.18 billion and for location promotions are estimated to total £4.6 billion, over 25 years. This takes into account direct savings to the NHS, monetised health benefit, and social and economic savings.

Price and location promotions of HFSS products encourage purchasing and consumption of these products, and cause consumers to spend more money than they otherwise would. This has clear implications for the rising cost of living. Contrary to industry arguments, promotions do not save people money and instead encourage them to spend more. Figures from the Money Advice Service<sup>49</sup> estimate that promotions cause consumers to spend around £1,300 a year more than they otherwise would. Significantly, promotions appeal to everyone from all demographic groups, not just those on low incomes.

The current cost of living crisis will only make everyday living more challenging for many individuals and families across the country, with the affordability of food a key driver influencing towards the types of foods which individuals purchase<sup>38</sup>. Implementing price and location promotion restrictions of HFSS products would see those on lower incomes, who are more price sensitive, experience disproportionately greater health benefits, thus potentially narrowing the inequalities gap.

Furthermore, the latest Primary 1 BMI data (published on 14th December 2021) highlights significant and worrying trends in the weight of Scottish children. In the 2020/21 school year, 29.5% of children in Primary 1 were at risk of developing overweight or obesity, an increase of 6.8% from the previous year<sup>50</sup>. Importantly, the biggest increase







across weight categories was seen in those at risk of obesity which rose to 15.5% (up from 10% in 2019/20)<sup>50</sup>. In England, 14.4% of children aged 4-5 and 25.5% of children aged 10-11 are living with obesity. These figures have significantly increased from 2019/20, when 9.9% of children aged 4-5 and 21.0% of children aged 10-11 were living with obesity<sup>51</sup>. Children from the most deprived backgrounds in Scotland are also almost three times as likely to be at risk of obesity than their peers from the least deprived areas (21% vs 8%). Tackling the inequalities gap will require action across a number of policies but improving the food environment is

key. It is clear therefore that action on the promotion of unhealthy foods is urgently needed to protect and improve the health of children and to achieve the aim of halving childhood obesity by 2030.

Additionally, the COVID-19 pandemic has changed relationships with food and consumption patterns, exacerbating existing problems with diets and unhealthy eating and weight, with many people reporting eating more unhealthy foods on a more regular basis. We commissioned polling in May 2020 which was repeated again in March 2021<sup>52</sup>, to monitor the ongoing impact of the

pandemic on food consumption patterns. In March 2021, 40% of respondents reported their diet had become worse, compared to 35% in May 2020<sup>52</sup>. There was also a significant increase in the number of people eating takeaways since the start of the pandemic – 31% in March 2021, compared to only 12% in May 2020<sup>52</sup>. Food Standards Scotland (2021)<sup>25</sup> situation report highlights that the takeaway market in Scotland in 2020 grew by 31%, to a market value of £1.1 billion, compared to 2019 pre-pandemic, with two-thirds of people reporting it was difficult to eat healthily when having a takeaway.



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