



## Centre for Food Policy

Policy and practice to redesign food systems

# Lessons from English promotions regulations

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# The City for Food Policy

## Vision:

To inform policy and practice that redesigns food systems which are fair, healthy, environmentally sustainable and resilient

## Our primary activities:

Generate  
evidence

Provide  
spaces  
for debate

Impact  
policy &  
practice

Educate  
in food  
policy

*Partnership, engagement, lived experience*

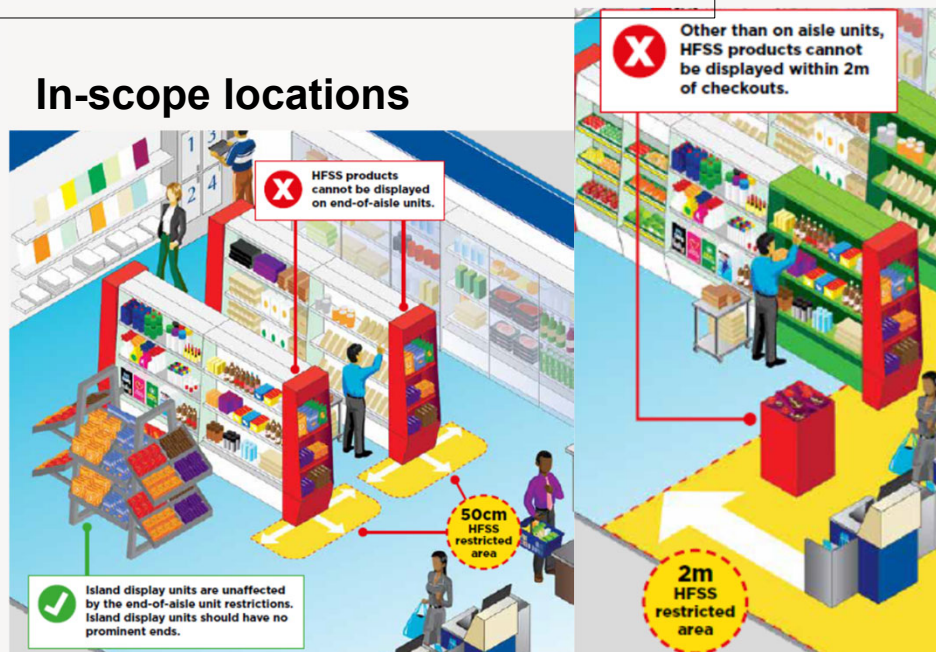


# Food (promotions and placement) Regulations 2021

## In-scope businesses

50+ employees; stores >2,000 sq. ft  
non-food & online retailers

## In-scope locations

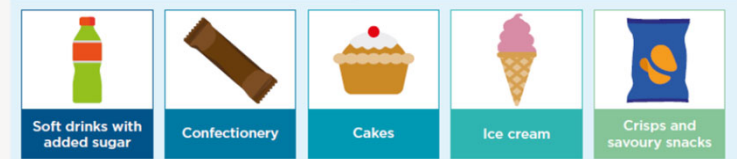


## In-scope products



Nutrient Profiling Technical  
Guidance

January 2011



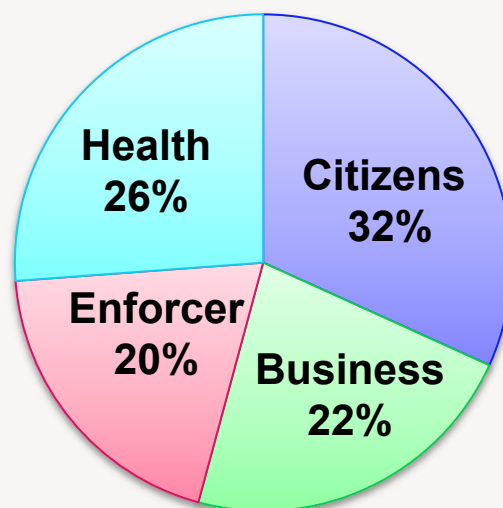
**Enforcement by:**  
Local authorities

# What did people say about the regulations?



**Rapid qualitative methods**

n=108 stakeholder interviews



**Systems approach**



n=453 delegates free online conference



**Validation & prioritisation**

# Theme 1: legislation is ‘good first step’ but...

## Exploitation of loopholes

*“that’s kind of the thing that worries me a bit, are we really going to replace this with something that’s good for your health.”*

(11001, Business)

## Exemptions may increase inequalities

*“a significant number of small businesses won’t be caught by the regulations; our children are going to those smaller stores after school.”*

(13036, Enforcer)

## Complex issue

*“this policy alongside others are a really important to address childhood obesity.”*

(12026, Health Group)

## Rebalancing food cost

*“I do strongly believe the government should keep the price of sugar and fat foods higher and the healthier food lower in price.”*

(6303, Consumer)

## Theme 2: Inconsistent approaches may affect impact

### Priorities

*“We do promotions to attract customers to come to buy stuff. If we can’t do it, they go to a supermarket. Obviously we’re losing customers. How are we going to survive?”*

(11086, Business).

*“There could be that rush to the top as it were, instead of the bottom where we’re all trying to find new ways to promote healthy stuff.”*

(11011, Business).

### Complexity

*“Using square footage to determine in-scope businesses is complex. Will not be sending officers out with a tape measure.”* (13011, Enforcer)

### Resource limitations

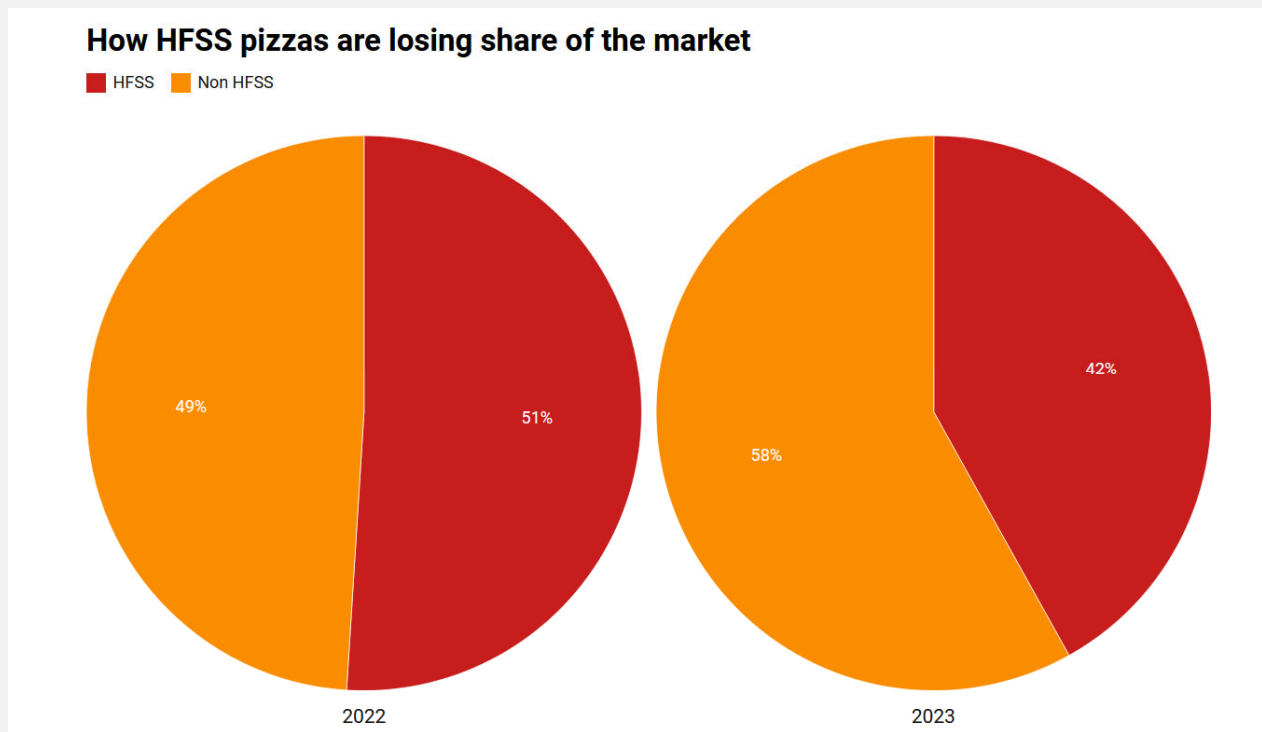
*“You’ve got limited resources, you have to target those at stuff that has probably the most imminent risk.”* (13011, Enforcer)





# Early findings show reduction in HFSS foods

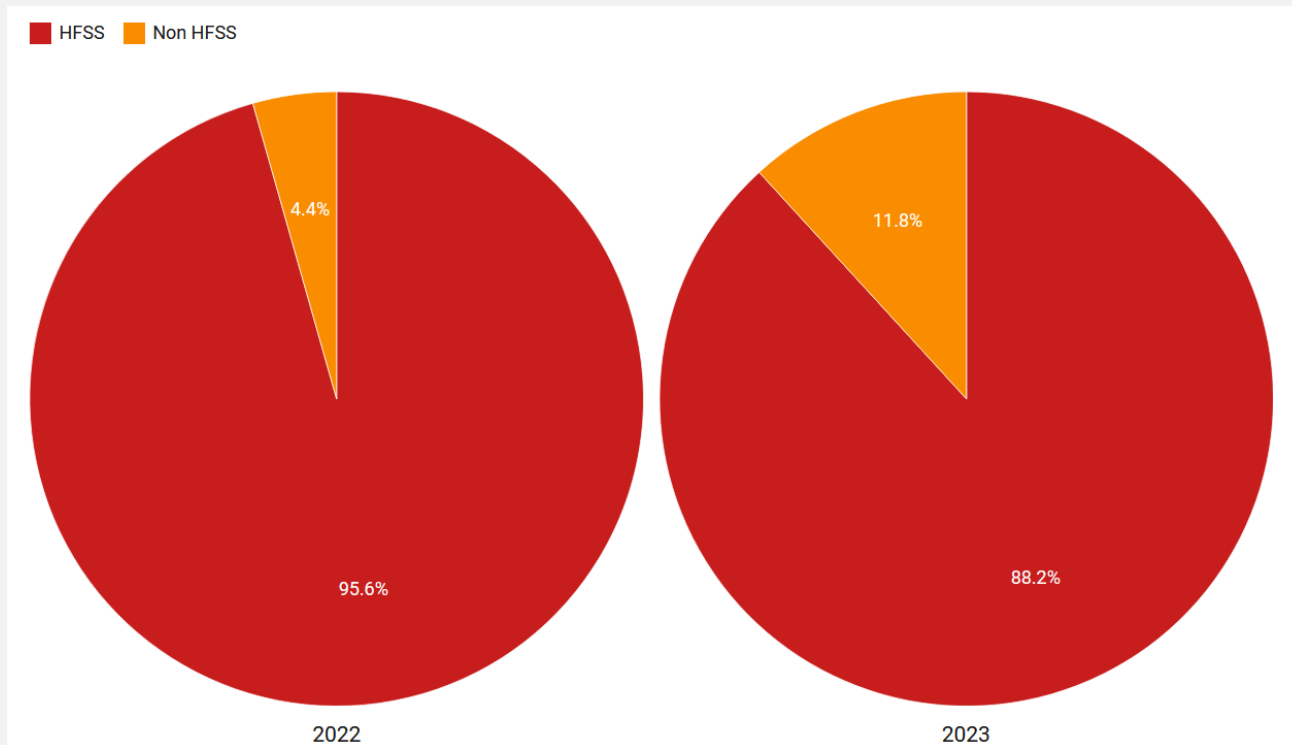
## Pizzas

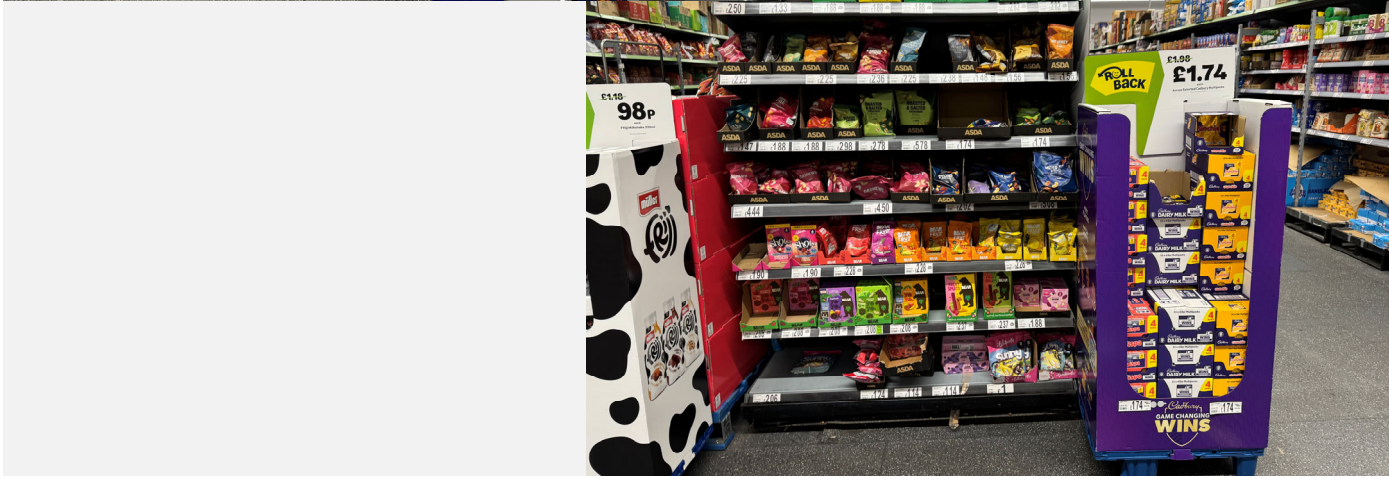
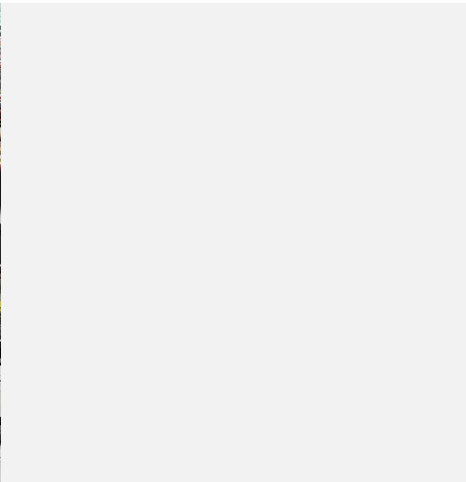




# Early findings show reduction in HFSS foods

## Crisps





# Insufficient enforcement

## New enforcement framework

*"How many bargain buckets, do you need in a row for that to constitute as an aisle? You'll have someone in Cornwall saying six in a line, I know that that's aisle, but you might have an officer in Lincolnshire saying no, they're just buckets, they're fine."*

(13029, Enforcer)

## Regional and local activity

*"We do have good food retail meetings. Environmental Health is represented, our business support team is there, our Public Health team is there. And we've got a social enterprise in our borough, that works specifically around food, that often gets commissioned by the Council. So, there are things in play that might help with this legislation."* (13036, Enforcer)

## National government leadership

*"Tricky to see any long-term enforcement without funding"* (13004, Enforcer)

# Insufficient funding for enforcement

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## Treading lightly on HFSS trading compliance

With the high in fat, salt and sugar legislation in place for a number of months now, is the government taking it seriously or have retailers seen this as an inevitable step change and complied.

14 March 2023



Fol request showed:

- £179,000 – year 1
  - £102,000 – year 2
- ➡ shared by >300 LGAs



# Evidence on price promotions



## Exemptions may increase inequalities

*“Will the problem shift so we see a huge amount 25% off or 50% off price promotions instead?”*

(13013, Enforcer)

## Rebalancing food cost

*“Far from saving people money promotions lead to more purchases and contribute to greater consumption, resulting in overweight and obesity.”*

(12039, Health expert)

*“I do buy treats for my children but like I said they’re treats so if they’re not on offer then I would still get them but probably not as frequent.”*

(6029, Consumer)



# Recommendations

1. Make a central HFSS calculator freely available

2. Refine legislation to enhance intent and close loopholes

3. Conduct a robust evaluation – intended & unintended effects

4. Provide greater support for small businesses

5. Provide ring-fenced enforcement resources for local authorities

6. Create and communicate a long-term food & health roadmap



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# Thank you

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Has HFSS legislation led to healthier food and beverage sales? The DIO-Food protocol – using supermarket sales data for policy evaluation

Research Award

Active Award

Award ID: NIHR156535

Shortlist: [+](#)

Evaluating the impact of the placement regulations on the CONvenience store sector and co-creating solutions for a healthier system: ECON study

Research Award

Active Award

Award ID: NIHR207065

Shortlist: [+](#)

ENTHUSE Evaluating The High fat sUgar Salt rEgulations: practice, response and impact across retail settings