



OBESITY & PROMOTION OF HFSS PRODUCTS

Key Points

- » Promotions encourage people to buy more junk food and other products and services. Together with advertising, promotions are the most pertinent form of marketing to young people
- » Price promotions cause us to buy 18% more food and drink products in the UK
- » High sugar food and drink products are more likely to be promoted in Scotland and the UK than in Europe; and are also more likely to be promoted at higher levels of price discount
- » The Scottish and UK Governments have indicated their concern, and have both undertaken consultations and action on restricting promotions of food and drink products that are high in fat, sugar and salt (HFSS)
- » The UK Government plan to implement legislation to restrict the promotion of HFSS products in England by April 2022
- » The introduction of Scottish legislation has been put on hold due to the effects of the COVID-19 pandemic
- » Regulation of promotions of HFSS products is urgently required, in order to protect children and adults from excess calories and create a consistent, sector-wide level playing field

Key Actions

- Legislation must be introduced in Scotland to restrict effectively all types of promotion of HFSS products including:
- » Price promotions (i.e. temporary price reductions, multibuy and other)
 - » Non-monetary promotions, especially location at most frequently seen/visited places in-store as well as online
 - » These measures must apply to online sales, as the UK online grocery market continues to increase and the use of online food ordering increases
 - » These measures must apply across both retail and out of home
 - » Businesses must be enabled, encouraged and incentivised to increase the amount of healthy foods on promotion



Obesity Action Scotland

Healthy weight for all

DEFINITIONS

Marketing is defined by the World Health Organization (WHO) as “any form of commercial communication or message that is designed to, or has the effect of, increasing the recognition, appeal and/or consumption of particular products or services.”¹

Promotions is a form of marketing, “the publicising of a product, organization, or venture so as to increase sales or public awareness.”²

Price promotions is defined by The Scottish Government as “where the price of a product (or combination of products) is used to promote its sales.”³ Price promotions usually take one of three forms: a temporary price reduction (TPR), multibuy or extra-free.

Non-monetary promotions is defined by The Scottish Government as “marketing or promotion that is not a price promotion, e.g. placement promotions.” This includes, positional or location promotions involving store layout (i.e. end of aisle, front-of-store and checkout displays), product

information promotions (i.e. banners, flyers, shelf decoration), promotions with prizes (i.e. prize draws).³

HFSS food and drink food and drink products that are assessed as being high in fat, sugar and salt.

Discretionary Foods a subset of HFSS products, including confectionery, sweet biscuits, crisps, savoury snacks, cakes, sweet pastries, puddings and sugar containing soft drinks. These foods convey little or no nutritional benefit but have a significant impact on the diet, accounting for, on average, about one fifth of total calories, total fat and saturated fats and over half of daily free sugars consumption. ⁴

Disability-adjusted life year (DALY) a unit of measurement in cost-benefit analysis. Defined by WHO as, “one lost year of “healthy” life. The sum of DALYs across the population, or the burden of disease, can be thought of as a measurement of the gap between current health status and an ideal health situation where the entire population lives to an advanced age, free of disease and disability.”⁵

PROMOTIONS IN THE UK AND SCOTLAND

Public Health England estimated in their 2020 report that 34% of the total food and drink products bought in the UK between 2017-2018 were sold on promotion – amongst the highest proportion in the European market.⁶ Similarly, Food Standards Scotland reported that 32% of the calories bought in 2018 in Scotland were purchased on price promotion.⁷ Price promoted products also account for 36% of the proportion of total fat and saturated fat bought in Scotland in 2018.⁷

Temporary price reductions (TPRs) remain the most commonly used price promotion in retail in the UK, across all categories of food and drink, with an estimated 24% of food and drink products purchased in 2018 attributable to this type of promotion.⁶ Calories purchased on multibuy promotion (defined as Y for £X, “buy one get one free” and “3 for 2” offers fell from 14% to less than 10% between 2010 and 2018.⁶

Public Health England’s analysis of Kantar data in 2020 showed that 18% of promotional sales are ‘net growth’ – in other words sales which would not have occurred without the presence of a promotion.⁶ There seems to also be a skew in the types of food and drink purchased on promotion in Scotland - towards unhealthy products.⁷

In 2018, almost half of all crisps and savoury snacks sold in Scotland were purchased on promotion (46%).⁷ Over 40% of confectionery and sugary soft drinks were also purchased on price promotion.⁷ Compared to healthier categories such as plain bread, vegetables/salad leaves, fruit, and fish – less than 30% of which were purchased on promotion in each category.⁷

Food and drink products high in sugar (including those with added sugar) are more likely to be bought on



promotion in the UK than those lower in sugar.⁶ These high sugar products are also more likely to be promoted at higher levels of price discount than their lower sugar equivalents.⁶ Public Health England found, in their 2020 report, that the proportion of high sugar products sold on promotion was 6% higher than the total food and drink products sold on promotion (40% vs. 34%).⁶ A discrepancy can also be observed in the monetary value of the promotional discount provided on high sugar vs. lower sugar products. The average food and drink price promotion discount is 30%, but is increased to an average of 32% for high sugar products.⁶ Further to this, it was calculated that 5.5% of take home sugar is an 'incremental consequence of promotions' – 4.4% of this was on high sugar products.⁶ This highlights the fact that a 4.4% sugar intake reduction could potentially be achieved simply by eliminating promotions on high sugar products.⁶

There is also a difference in the sizing of foods being purchased on price promotion in Scotland.⁷ Of the most purchased categories of food on promotion (crisps and savoury snacks), multipacks and larger sized sharing packs are more frequently bought on

promotion than smaller sized single packs, encouraging overconsumption of HFSS products.⁷

FSS survey data from 2019 revealed that price promotions are also influential in individuals' impulse buying of unhealthy products: 57% of individuals surveyed stated that multibuy promotions have led them to impulse buy unhealthy foods that they weren't planning to, 43% stated that temporary price reductions caused them to impulse buy, and 33% stated that loyalty pricing resulted in impulse buying.⁸

Promotions have been shown to have a differential, negative effect in children and young people, increasing purchasing of unhealthy foods in these groups disproportionately.⁹ A survey of the impact of food and drink marketing on young people in Scotland found that 74% of promotions were in foods high in energy/fat/salt and/or free sugar.⁹ The study also showed that 54% of all marketing-prompted purchases were related to a price promotion with over a third of those (35%) being sugar-sweetened beverages, chocolate or sugar-based confectionery.⁹ The researchers suggested that price promotions together with advertising were the most salient forms of marketing to young people.⁹

PROMOTIONS OUT OF HOME

It is also important to consider food eaten outside of the home, as this accounts for up to 25% of the total calories consumed in Scotland.³ The Scottish people spend an estimated total of £4.6 billion in the Out of Home (OOH) market each year.¹⁰ In 2018, there were around 960 million OOH visits in Scotland.¹¹ Consumers made an average of 4.2 OOH trips per week.¹⁰ The number of OOH trips featuring a price promotion in the UK rose from 6.1% in 2017 to 6.7% in 2018.⁶

The level of purchase on promotion is lower in the OOH sector than in retail in Scotland (9.5% vs. 34% respectively) and the balance of promotional techniques is different¹¹. In the OOH sector, the majority of promotions are meal deals or multibuy (76%), with vouchers (10%) and other types of promotions (15%) being only a small proportion.¹¹

A 2018 report on marketing strategies used by businesses in the OOH sector in Scotland showed that price promotions were the most common marketing strategy used, in particular multibuy. Other common strategies included product placement beside till areas, used by 68% of businesses included³ in the report, and 'meal deals'.¹² The foods displayed near till areas were most likely to be high sugar products such as sweets, biscuits and cakes.

The OOH outlets that use promotions most in Scotland are convenience stores, bakeries and sandwich shops, and supermarkets.¹¹

It is also important to note that 40% of the most popular OOH businesses in Scotland do not provide nutritional information such as calorie content on their products, including those products which are promoted.¹³ In a 2018 survey, 66% of individuals stated that they believed cafes and restaurants should display calorie content of products on their menus.¹³



ONLINE GROCERY SHOPPING



Another important source of food and drink promotions to consider is the online shopping sector, which is becoming increasingly popular – especially amidst the current COVID-19 pandemic.¹⁴ Between March and April 2020, online shopping use in the UK increased by 83% as the first national lockdown was implemented.¹⁴ This increase in online food shopping is expected to last past the pandemic – with 69% of people surveyed in the Waitrose 2021 Food and Drink Report stating that they plan to continue grocery shopping online past the pandemic.¹⁵

Consumers are exposed to both price promotions and non-monetary promotions in the online shopping sector. Our [report on online promotions](#) revealed that at least a fifth of food and drink promotions online are for unhealthy food and drink such as crisps, confectionery and sugary drinks. Customers are continuously exposed to large volumes of unhealthy product promotions online.¹⁶ A 2017 analysis of a large dataset of online grocery transactions from the UK Morrisons supermarket found that an estimated 60% of all products added to baskets online were categorised as ‘disrupted’ – meaning that these products were added as a consequence of an engagement with offers, featured products, recommended products, or site navigation to relevant products.¹⁷

One important distinction to note about promotions in the online shopping sector is the fact that internet shopping allows retailers to recognise returning customers and promote products specifically to individuals, tailoring promotions to be as appealing as possible – potentially promoting impulse buying and purchase of discretionary products.¹⁸



WHY ADDRESS PRICE PROMOTIONS?

The need to regulate price promotions

- » The pricing of food and drinks is a highly influential factor for consumers when making purchase decisions¹⁹
- » Recent analyses of UK purchasing data shows that there is an inverse relationship between product pricing and consumer demand, meaning that the cheaper the products are – the more in demand they are. This leads to overconsumption of unhealthy food and drinks²⁰
- » Promotions make products cheaper and change normal shopping patterns²¹
- » In 2020, PHE reported that the UK had amongst the highest prevalence of price promotions across the whole of Europe⁶
- » Price promotions are one of the most common marketing strategies used in the OOH sector in Scotland¹²
- » The effects of promotions can be seen across all demographic and socioeconomic groups¹³
- » Price promotions in food and drink products online also results in an increase in sales²²



Benefits of restricting price promotions

- » Evidence shows that increasing the skew of price promotions towards healthy food could improve diets if implemented correctly¹⁹
- » Price promotions were one of the eighteen obesity intervention areas identified in The McKinsey Global Institute report,²³ which highlighted that the potential impact of price promotion would depend on price change
- » As a large proportion of foods purchased when eating OOH are discretionary foods¹¹ targeting price promotions in this sector could lead to a decrease in consumption of these foods. Evidence from the McKinsey report²³ also supported the idea that restricting promotional activity in high-calorie foods could decrease consumption
- » There is evidence that price promotions result in impulse buying, overconsumption, and stockpiling.²⁰ Removing promotions from unhealthy food and drink products is therefore likely to result in a decrease of these behaviours surrounding such products

WHY ADDRESS NON-MONETARY PROMOTIONS?

The need to regulate non-monetary promotions

- » End-of-aisle displays have been previously demonstrated to increase impulse purchasing, with almost a third of individuals surveyed by FSS admitting that end of aisle displays have led them to buy unhealthy food or drink on impulse⁸
- » In the Out of Home sector, foods placed beside till areas are more likely to be high in sugar, such as sweets, cakes and biscuits¹²
- » 'Upselling' (encouraging customers to buy larger volumes or to pay more) 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 planned¹²
- » In 2018, the Obesity Health Alliance surveyed food and drink product placement within five supermarkets. 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.²⁴ 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 programme²⁴



Benefits of restricting non-monetary promotions

- » 67% of individuals surveyed in Food Standards Scotland's Consumer Tracking Survey stated that they believed that placing HFSS foods at checkout resulted in them buying more.⁸ Removing unhealthy products from checkout areas would therefore likely result in a significant decrease in the purchase of such products
- » A 2020 systematic review concluded that increased availability and more promotions of healthy food, and conversely less promotions of unhealthy foods leads to "better dietary-related behaviours"²⁶
- » A 2018 study of food purchased from checkout areas of nine UK supermarkets found that supermarkets with checkout food policies had an immediate 17% fall in sugary confectionary, chocolate, and potato crisps purchased.²⁷ This result suggests that placement of food and drinks in key locations does impact consumer habits – and that removing unhealthy food and drinks from key locations is likely to result in a decrease in the purchase and consumption of such products

PUBLIC ATTITUDES

In the October 2020 wave of the FSS Scotland Consumer Tracking Survey, 68% of individuals stated that it worried them that unhealthy foods are price promoted more often than healthy foods.²⁸ Further to this, 50% of individuals stated that they believed promotional offers on HFSS foods should be banned.²⁸ Overall, 58% of those surveyed said that they supported the restriction of marketing and promotion of some unhealthy food and drinks in Scotland.²⁸ Obesity Health Alliance's 2020 survey found that 72% of the public supported government action on restricting promotion of unhealthy food in prominent places and 62% of people supported restrictions on price promotions.²⁹ Finally, 57% of individuals who responded to the 2020 UK Government consultation, stated that they supported the decision to restrict the promotion of HFSS food and drink products.³⁰

Respondents to Food Standards Scotland's 2019 survey thought that promotion of foods in the OOH sector, irrespective of whether the foods are healthy or unhealthy, should not be restricted for adults. However, they were clear that for children unhealthy choices should be limited, including restrictions of promotional offers of unhealthy products.³¹

In the context of eating Out of Home, the FSS Consumer Tracking Survey highlighted that the public would like it to be easier for them to eat healthily OOH.⁸ The majority of individuals surveyed stated that it would be easier to eat healthily in the OOH sector if lower prices

for healthy foods were available (57%) and there were better promotions of healthy options (55%).⁸ More than a quarter of individuals also agreed that it would be easier to eat healthily OOH if there were less promotions on unhealthy products (26%), and 19% agreed that removing the placement of unhealthy products at checkouts would improve their ability to eat healthily OOH.⁸



EFFECT ON BUSINESS

The UK Government released Impact Assessments alongside their consultation in 2018^{32,33}, where they detailed the costs involved in implementing price promotion restrictions. The estimated loss in profits for retailers, the OOH sector and manufacturers over, 25 years, were projected to be £0.7bn, £0.4bn and £0.4bn, respectively, for location promotions. For volume promotions, estimated loss for retailers is expected be around £175m and manufacturers £55m, over 25 years. The loss to the OOH sector has not been defined. However, these projections have been likely compromised due to the unknown effects of the COVID-19 pandemic.



POLICY POSITION AND FUTURE ACTIONS

Both the Scottish and UK Governments have concluded that mandatory legislation was required to create consistent, sector-wide action to produce the desired effect and behaviour change. As a result of this, both Governments have held consultations on the restriction of promotion of HFSS products, details of which can be found below in Table 1.

The strategies proposed by both Governments differed in several areas including the definition of products that should not be promoted and the definition of multibuy (Table 1). Suggested non-monetary promotion

restrictions were described more in-depth by the Scottish Government, going beyond that of the UK Government to include strategies such as upselling, coupons, offering of free samples and branded units.

The Scottish Government also suggested applying the same price promotion restrictions to the OOH sector as for retailers, alongside additional considerations, whereas the UK Government only considered the price promotion of pre-packaged HFSS products and free refills of sugary soft drinks in the OOH context (Table 2).

Table 1

Details of the Scottish and UK Governments consultations on promotion of HFSS products

Sources: **Scottish Government:** Reducing health harms of foods high in fat, sugar, or salt
UK Government: Restricting promotions of food and drink that is high in fat, sugar and salt

	Date Published	Closing Date	Defining products that should not be promoted	Suggested Price Promotion Restrictions	Suggested Non-monetary Promotion Restrictions	Settings
Scotland	October 2018	January 2019	Discretionary categories: confectionery, sweet biscuits, crisps, savoury snacks, cakes, pastries, puddings, sugar-sweetened beverages, and possibly ice-cream and dairy desserts	Multibuys* Sale of unlimited amounts for a fixed charge *Defined as (a) two or more separate products sold together to obtain a discount or (b) one or more products given free as a result of a purchase. incl. meal deals	Placement of HFSS at checkouts, end of aisle displays, front of store, island/bin displays Promotion of value, shelf-edge displays and signage, in-store advertising, upselling, coupons, purchase rewards, free samples and branded chillers and display units* *Not an exhaustive list	Any place where targeted foods are sold to the public in the course of business, e. retail, Out of Home outlets and wholesale outlets wher sales are made to the public
UK	January 2019	April 2019	2004/5 Nutrient Profiling Model applied to foods included in PHE's reformulation categories and in scope of Soft Drinks Industry Levy	Only pre-packaged products: Multibuys* Extra-free *Defined as – where the discount is obtained by purchasing more than one unit, such as in 'buy one get one free' and '3 for 2 offers'. Does not incl. meal deals	Location restrictions apply to both non-pre-packaged and pre-packaged products. Price restrictions only to pre-packaged products. Placement of HFSS at checkouts, end of aisle displays and front of store	All retail businesses which sell any food and drink products, including their franchises and online stores Retailers who do not primarily sell food and drink e.g. clothes retailers and newsagents

Table 2

Out of Home Proposals

Sources: Scottish Government: Reducing health harms of foods high in fat, sugar, or salt: consultation analysis
UK Government: Restricting promotions of food and drink that is high in fat, sugar and salt

	Out of Home Proposals	Out of Home Settings
Scotland	<p>From Price Promotions Consultation:</p> <p>Multibuys</p> <p>Sale of unlimited amounts for a fixed charge</p> <p>From OOH Consultation:</p> <p>Encouraging food business to reduce upselling and upsizing of non-discretionary HFSS foods</p> <p>Reduction in promotion or marketing of large or multiple portions</p> <p>Businesses positively marketing and promoting fruit and vegetables</p> <p>Raising consumer awareness and motivating behaviour change through the use of social marketing campaigns, e.g. 'say no to upsizing'</p>	<p>Cafes, restaurants, takeaways, pubs/bars, vending machines, workplace canteens, hotels, leisure and entertainment venues</p> <p>Supermarkets and convenience stores who provide food 'on-the-go'</p> <p>Places where we purchase food when commuting or travelling</p> <p>Manufacturers and suppliers of food and drink to the Out of Home Sector</p> <p>Food delivery services, including online</p>
UK	<p>Pre-packaged HFSS products</p> <p>Free refills of sugar-sweetened soft drinks in scope of Soft Drinks Industry Levy</p>	<p>Businesses that sell food and drink products to be consumed outside the home or on the go, e.g. restaurants, coffee shops, takeaways</p>



ACTIONS FOLLOWING UK/SCOTTISH GOVERNMENT CONSULTATIONS

Following consultations, as described in **Table 1** and **Table 2**, both the Scottish Government and UK Government announced action to restrict the promotion of HFSS products.

The **Scottish Government** in its Programme for Government 2019-20 included a commitment to bring forward a Bill on Restricting Foods Promotion.³⁷ This framework bill should have led to regulations that restricted the promotion of unhealthy products in Scotland. The aim of the proposed policy was to reduce excessive consumption of sugar, salt and fat in Scotland, in turn lowering the associated risks of developing obesity-related disease such as type 2 diabetes and certain types of cancer.

However, on June 11th 2020, the Scottish Government announced that the introduction of this legislation would be paused - and that the Restricting Foods Promotion Bill was no longer going to be implemented in 2020, due to the effects of COVID-19 and the unknown impact that the pandemic will have on food and drink industries.³⁸ Though, the Scottish Government have stated that they do still have plans to implement promotion restrictions in the future:

*"We remain fully committed to restricting the promotion and marketing of foods high in fat, sugar or salt where they are sold to the public and will seek to progress this measure as soon as it is possible to do so. Pausing the introduction of the bill provides us with an opportunity to take stock, take into account the impact of the COVID-19 lockdown, including on people's diet and healthy weight."*³⁹

Following consultation, the **UK Government** announced in 'Tackling obesity: empowering adults and children to live healthier lives' that they intended to implement legislation by April 2022 which will restrict the promotion of HFSS products by both location and price in medium and large retailers in store and online in England.²⁵ Locations restrictions will include: end of aisle promotions, checkout promotions, store entrances, and online equivalents such as personalised promotions on payment pages, landing pages, and main/home pages of websites.³⁰ Pricing restrictions will prohibit volume promotions such as: "buy one get one free" and "2 for 1".³⁰ Free refills of sugary soft drinks will also be restricted in the OOH sector.³⁰ Price promotion restrictions will not apply to TPRs.³⁰

How could the restriction of price promotions of HFSS products help?

In addition to the benefits of the restriction of promotions listed in the boxes above, further positive effects of such policy change are likely.

Considering the excessive amounts of discretionary food consumed in Scotland, mandatory measures restricting the promotion and marketing of such foods could have a positive impact on public health.³

FSS believes that halving discretionary food intake (the equivalent of 190 kcals per person, per day) would be a 'key step' to improving the Scottish diet.⁴ This would align with the Scottish Dietary Goal,⁴⁰ revised in 2016, which advises a 120kcal reduction per person, per day, and would likely bring us closer to the goal for free sugar consumption.

The economic costs associated with obesity are high. It is estimated that the cost of ill-health associated with overweight and obesity cost the NHS £6.1bn in 2014/15.⁴¹ This figure is projected to rise to £9.7bn by 2050.⁴¹ It is also estimated that costs to the wider society are even greater, at £27bn per year, expected to rise to almost £50bn by 2050.⁴¹

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.²³ 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 by the 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 savings on applying restrictions on volume promotions are estimated to total **£3.18bn**³² and for location promotions are estimated to total **£4.6bn**,³³ over 25 years. This takes into account direct savings to the NHS, monetised health benefit, and social and economic savings.

The UK Government's implementation of promotion restrictions in England is expected to result in the reduction of purchasing and consumption of discretionary food and drink products.³⁶ PHE has recommended that the restriction of promotion on HFSS products will reduce population sugar and calorie consumption, and therefore will consequently reduce obesity levels.³⁰ As children are shown to be disproportionately impressionable to HFSS product promotions, the introduction of legislation to reduce such promotions should reduce the purchase and consumption of these products specifically in children. However, what is unknown is the extent to which the restricted methods of promotion will be replaced by the ones still allowed. Temporary price reductions especially should be closely monitored after April 2022 in England.

The NHS and wider Scottish society could benefit greatly from the implementation of promotion regulations. This would be a key step towards changing the obesogenic environment, with the potential to improve the overall health of the Scottish population.¹³

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