



Joint Response from Action on Salt & Action on Sugar to the Scottish Government's consultation - Reducing health harms of foods high in fat, sugar or salt

Action on Salt

Action on Salt (formerly Consensus Action on Salt & Health, CASH) is an organisation supported by 24 expert members and working to reduce the salt intake of the UK population to prevent deaths, and suffering, from heart disease, stroke, kidney disease, osteoporosis, stomach cancer and obesity.

Action on Sugar

Action on Sugar is a group of experts concerned with sugar and obesity and its effects on health. It is working to reach a consensus with the food industry and Government over the harmful effects of a high calorie diet, and bring about a reduction in the amount of sugar and fat in processed foods to prevent obesity, type 2 diabetes and tooth decay.

For more information, please contact: Holly Gabriel, Nutrition Campaigner sugar@qmul.ac.uk

To what degree do you agree or disagree that mandatory measures should be introduced to restrict the promotion and marketing of foods high in fat, sugar or salt to reduce health harms associated with their excessive consumption?

Strongly agree

Foods high in fat, salt and sugar are heavily promoted in supermarkets as well as in the out-of-home sector, and it has been found that such promotions increase the amount of unhealthy food and drink people buy by at least 6% of total sugar purchases (i.e. 30kcal per person, per day). This could be prevented if promotions on high-sugar products did not occur.¹

1. Public Health England (2015) Sugar Reduction: The evidence for action

Should this policy only target discretionary foods?

We believe that the UK Department of Health's current nutrient profiling model, once updated, is the most efficient and effective way of defining the types of products restricted. The nutrient profiling model is evidence-based and already well-known by the food industry. We believe all relevant food bodies should adopt the UK Department of Health's updated nutrient profiling model across the UK, once it is published. The update should include the updated free sugars recommendation following the findings of the Scientific Committee on Nutrition's (SACN) 2015 report on carbohydrates and health.¹

1. SACN (2015) Carbohydrates and Health

Should this policy treat ice-cream and dairy desserts as discretionary foods?

Ice cream is a category contributing to total take home purchase of saturated fat and sugar, and this contribution rose between 2010 and 2016 in Scotland. Temporary price reductions are most common for this food category.¹



Focus should be placed on shifting sales to products still comparably high in calcium but lower in sugar such as plain yogurts. Using the nutrient profiling model to categorise products will allow for healthier products to be promoted and shift sales to these products.

1. https://www.foodstandards.gov.scot/downloads/Monitoring_retail_purchase_and_price_promotions.pdf

Please comment on our approach to defining categories and exclusions of particular foods/products from those definitions

We support your approach in restricting forms of promotion and marketing.

Price promotions that would be subject to restrictions

We believe that only healthy (non-HFSS) products should be put on promotion (including price promotions such as meal deals, multi-buy and extra-free deals). The restriction on temporary price promotions should only include products that are nearing their use by/best before date and not to promote a new product or any other type of temporary price promotion.

Please comment on the approach we are proposing to take to restricting forms of promotion and marketing

We support your approach in restricting forms of promotion and marketing.

Should the restrictions apply to any place where targeted foods are sold to the public, except where they are not sold in the course of business (e.g. charity bake sales)?

We agree with the rationale that these restrictions should apply to any place where targeted foods are sold to the public.

Please comment on whether, and if so to what extent, restrictions should be applied online

Restrictions, where relevant, should be applied online in the same way as in retail stores and the out-of-home sector. For online sales this should include-

- Sections on supermarket websites such as 'healthy lunch-boxes' should be monitored to ensure appropriate products are featured as well as 'multibuys' etc
- Free beer/soft drink with your order on online food delivery businesses should be restricted
- Colour coded nutrition labelling should be on all foods and drinks sold online by supermarkets and restaurants

Should restrictions to displaying targeted foods at end of aisle, checkouts etc., not apply where there is no reasonable alternative to displaying them elsewhere?

In stores where there is no reasonable alternative to displaying products, e.g. in a confectionary only store, then products should be displayed higher up and out of reach and view of children.

Perhaps in such outlets the products should be displayed higher up and out of reach and view of children. If these products become less profitable, then outlets will seek to display alternative products.



Should food marked as discounted because it is close to expiry be exempt from:

- Positioning restrictions (end of aisle, checkouts etc) – No
- Promotion of value restrictions - Yes

Food marketed as discounted because it is close to expiry should not be exempt from positioning restrictions as this allows for foods high in fat, sugar and salt to be placed at checkouts without restrictions increasing impulse purchasing. However, to ensure minimal food waste, a softer restriction on 'promotion of value' restrictions could be considered.

How would the proposed restrictions impact on the people of Scotland, with respect to age, disability, gender reassignment, pregnancy and maternity, ethnicity, religion or belief, sex, sexual orientation or socioeconomic disadvantage?

Unplanned purchases of HFSS products prompted by price promotions can lead to unnecessary pressure on family food budgets, especially among low income families. The lowest earning 10% of UK households spend more than double the percentage of their disposable income on their food basket, compared to the highest earning 10% (17.3% and 7.5% respectively).¹ Evidence also suggests that price promotions are one of the reasons why unhealthy foods are more expensive than healthy foods.² Those from the most deprived areas of Scotland consume considerable less fruit and vegetables than those in the least deprived areas.³

1. Office for National Statistics (2017) Living Costs and Food Survey.
2. Fabian Commission of Food and poverty (2015) A Recipe for Inequality
3. Food Standards Scotland (2018) Estimation of Food and Nutrient intakes from Food Purchase Data in Scotland

Please outline any other comments you wish to make

Regulation to restrict promotions of foods high in fat, sugar and salt will create a level playing field for manufacturers, retailers and the out-of-home sector. Individual companies that wish to support positive purchasing habits may be fearful to do so due to the risk of reducing the relative market share. Regulation will protect those who act responsibly on price discounting, and make sure they are not penalised by those who do not.¹

We applaud the Scottish Government's commitment to tackling levels of overweight and obesity in Scotland by changing the food culture, if implemented this can be world leading. We strongly support the conclusion that a broad range of interventions is needed and that the focus should be on changes to the wider environment to help facilitate healthy choices over and above interventions that rely on individual choice.

1. The Guardian (2016) Supermarket price promotions targeting less healthy food, survey finds. (website)