

The Royal Society for Public Health

Response to UK Government consultation on restricting promotions of products high in fat, sugar and salt by location and price

Questions for Consultation

Businesses and products affected

1. Do you think that the restrictions suggested in this consultation should apply to all retail businesses in England that sell food and drink products, including franchises? Yes/No. Please explain your answer.

Yes, the restrictions in this consultation should apply to all retail businesses in England that sell food and drink products, including franchises. No matter their size or speciality, all businesses should take steps towards fulfilling the government's ambition to halve rates of childhood obesity by 2030¹. This should include all out-of-home businesses that use price promotions on HFSS products, such as fast food takeaway outlets (see Question 30 for more detail).

2. Do you think there are any other retailers that the restrictions suggested in this consultation should apply to? Yes/No. If yes, please explain which retailers and why.

The suggested restrictions in this consultation should apply to all retailers that sell food and drink, including those whose primary focus is not food and drink. This should include supermarkets (both large and small stores), convenience stores, newsagents, clothes shops, household goods shops and any other retailers that stock food or drink without it being their primary product. In addition, it should include businesses in the out-of-home sector that sell food and drink, including cafes, restaurants and fast food chains. It is crucial to have a level playing field across all businesses and retailers.

3. Do you think there are any retailers that the restrictions suggested in this consultation should not apply to? Yes/No. If yes, please explain which retailers and why.

All retailers should follow the restrictions. We recognise that it may be harder for smaller businesses to do this, and they may need a longer implementation period, but they should strive to meet the restrictions.

4. Do you think that the restrictions should also apply to retailers that do not primarily sell food and drink, for example, clothes retailers and newsagents? Yes/No. Please explain your answer.

Clothes retailers and newsagents should also be included, as these types of shop particularly promote high sugar confectionary products around the checkout area². A new report from the UK

¹

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718903/childhood-obesity-a-plan-for-action-chapter-2.pdf

² <http://ukhealthforum.org.uk/wp-content/uploads/2019/03/Strand-1-High-Street-Food-Placement-Project-Strand-One-Final-Report-March-2019.pdf>

Health Forum and Food Active found that 60% of respondents saw sweets and chocolate on sale during their last visit to a non-food store³. As many supermarkets are moving away from this practice⁴, other retailers should too in order to create a fair environment for all retailers.

5. Do you think that the restrictions should also apply to imported products within the specified product categories in scope? Yes/No. Please explain your answer.

Any product within the specified categories should be included, regardless of whether it is imported. For this strategy to be effective it must apply to all products within the specified categories. In 2017 the UK imported just over half of all food consumed⁵; although fruit and vegetables were the most imported products, meat and beverages were the second and third most imported products. Many meat and drink products sit within the categories specified in this consultation, some of which are imported.

6. Do you think that the restrictions should also apply to online shopping? Yes/No. Please explain your answer.

Yes, the restrictions should apply to online shopping as many people do their food shopping online. In 2017, 22% of UK consumers frequently purchased their groceries online⁶. The restrictions outlined should apply in store and online in order to send a consistent and effective message to tackle the obesity epidemic.

7. If the restrictions applied to online retailers, how could this work in practice?

The price promotion restrictions should apply consistently online and in store; products should be sold at the same price online and in store, with no volume based price promotions on HFSS products. If restrictions on price discounts were introduced, these should also apply online.

The location restrictions may be harder to adapt online. Products in scope of the restrictions could be banned from being promoted on the homepage, featuring on side bars, or in other prominent positions on websites. Websites should also be prohibited from suggesting HFSS products to customers.

8. Who should be responsible for making sure the price restrictions are followed: the retailer that sells the products or the manufacturer that makes them? Retailer/Manufacturer. Please explain your answer.

Both manufacturers and retailers should be responsible. Manufacturers should not include price promotions on HFSS products as part of the packaging. Retailers must ensure price restrictions are followed. Manufacturers should clearly define which products fall under the restrictions so retailers know what can and cannot be promoted.

9. Who should be responsible for making sure the location restrictions are followed: the retailer that sells the products or the manufacturer that makes them? Retailer/Manufacturer. Please explain your answer.

³ <http://ukhealthforum.org.uk/wp-content/uploads/2019/03/Strand-2-High-Street-Food-Placement-Project-Strand-Two-Final-Report-March-2019.pdf>

⁴ <https://www.tescopl.com/news/news-releases/2015/sweets-and-chocolates-removed-from-all-checkouts-from-today/>

⁵ <https://www.gov.uk/government/publications/food-statistics-pocketbook-2017/food-statistics-in-your-pocket-2017-global-and-uk-supply>

⁶ <https://www.statista.com/topics/3144/online-grocery-shopping-in-the-united-kingdom/>

Manufacturers and retailers should both be responsible for following location restrictions. Manufacturers should not be allowed to pay retailers to place restricted products in prominent locations, and equally retailers should introduce policies to ensure the restrictions are adhered to.

Price promotion restrictions

10. Which of the following options do you think is the most appropriate for achieving the aims of this policy:

Option 1 - Require retailers to ensure that all their volume based price promotions on food and drink are on healthier products.

Option 2 - We are open to alternative suggestions from stakeholders as to how this policy could be implemented in order to reduce overconsumption of HFSS products but also to encourage businesses to promote healthier products and to further incentivise reformulation. For example, we have explored the possible impact of requiring retailers to ensure that at least 80% of their sales from volume based price promotions on all food and drink per year are on healthier products.

Neither

Please explain your answer.

Option 1 is most appropriate for achieving the aims of this policy. For this policy to be effective, it must cover restrictions on all HFSS products, and only allow volume based price promotions of healthier products. Recent research by Cancer Research UK found that shoppers who buy more on promotion are more likely to be overweight or obese⁷. Option 2 is not clear enough to consumers and would rely on retailers sharing their sales data to work.

11. If you are proposing an alternative option, please explain how your preferred option would better deliver the aims of this policy, how it would be delivered and whether there would be any practical and/or implementation issues that we should be aware of.

NA

12. Do you think that the price restrictions should apply to 'multibuy' promotions and 'extra free' promotions of pre-packaged HFSS products (see Annex 5)? Yes/No. Please explain your answer.

Yes, the price restrictions should apply to promotions that result in purchasing more to take advantage of the discount. These types of promotion encourage over-purchasing and therefore over-consumption, so they do not save the consumer money in the long term, but they do contribute to weight gain⁸. Our report, The Child's Obesity Strategy, revealed that 47% of young people thought there should be limits on buy one get one free offers for junk food⁹. Polling commissioned by RSPH and Slimming World for our report, Size Matters, found that 60% of the public have experienced upselling of unhealthy, high calorie food and drink in supermarkets¹⁰.

⁷ 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. Timothy Coker, Harriet Rungay, Emily Whiteside, Gillian Rosenberg, Jyotsna Vohra. 2019.

⁸ <https://academic.oup.com/nutritionreviews/article-abstract/67/6/333/1812231>

⁹ <https://www.rsph.org.uk/uploads/assets/uploaded/403f6527-dd7a-4b7e-8ad62dab7bef33fd.pdf>

¹⁰ <https://www.rsph.org.uk/uploads/assets/uploaded/055c2d87-c3ab-4dfb-ba4aa44b9488c88f.pdf>

13. Do you currently use or do you know about any official definitions of these types of price promotions? Yes/No. If yes, please provide them below.

No

14. Do you think there are any other types of price promotion that should be restricted that we have not mentioned? Yes/No. If yes, please explain which types of promotion and why.

We strongly support restricting HFSS products that are sold at a discounted price. For this strategy to be effective, it must cover all HFSS products in scope of the restrictions, whether they are part of a volume based promotion or a price cut promotion.

Volume based restrictions alone won't be enough to tackle the obesity epidemic. We recognise that there is a greater evidence base around the link between volume based price promotions and HFSS consumption. In the first instance we would support further research into the impact of price reductions on purchasing and consumption of HFSS products before a restriction on discounts is introduced. See Question 47 for further details.

15. Do you think that the price restrictions should apply to pre-packaged products which fall into the categories included in Public Health England's (PHE) sugar and calorie reduction programmes and in the Soft Drinks Industry Levy (SDIL), and are classed as high in fat, sugar or salt (HFSS) (see Annex 3)? Yes/No. Please explain why.

Yes, it should apply to these products, as these contribute most to children's sugar and calorie intake, and subsequently childhood obesity¹¹.

16. Do you think any other product categories should be included in these restrictions? Yes/No. If yes, please explain which product categories and why.

No, initially these restrictions should just apply to the PHE Reformulation and SDIL products that are classed as HFSS. In time and after review, these restrictions could be introduced more widely to apply to other products. It would be necessary to have an agreed and clear definition specifying which new products the restrictions would apply to.

17. Do you think any of these categories should not be included? Yes/No. If yes, please explain which product categories and why.

No.

18. Do you think that the price restrictions should also apply to free refills of sugar-sweetened beverages in the out-of-home sector, if they are in scope of the SDIL, including where they could be a part of a meal deal? Yes/No. Please explain your answer.

Yes, these restrictions should apply to free refills of sugary drinks in the scope of the SDIL, even if they are part of a meal deal. These drinks contribute to sugar consumption and obesity, so any measure to reduce their consumption is beneficial. The World Health Organisation has recommended a reduced consumption of free sugars, and therefore sugar-sweetened beverages¹².

¹¹

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770704/consultation-on-restricting-price-promotions-of-HFSS-products.pdf

¹² https://www.who.int/elena/titles/ssbs_childhood_obesity/en/

19. For food and drink consumed outside of the home, are there other types of price promotion that should be restricted? Yes/No. If yes, please explain which promotions we should consider and why.

Meal deals should be considered for restriction. Many meal deals include HFSS products, so there should be further research into the impact of meal deals on purchasing and consumption.

Seasonal products should also be considered for restriction. Retailers should look at limiting how early they promote seasonal HFSS products. With three weeks to go until Easter, RSPH commissioned polling that revealed 23% of those surveyed had already bought and consumed at least one full sized Easter egg in 2019¹³. 77% of respondents thought that supermarkets start selling Easter eggs and other Easter related treats too early.

Location restrictions

20. Which of the following options do you think is the most appropriate to achieve the aims of this policy:

Option 1 - We propose that the location restrictions should apply to the following locations: store entrances, ends of aisles and checkout areas (see Annex 2).

Option 2 - We are open to alternative suggestions from stakeholders as to how this policy could be implemented. If you are proposing an alternative option, please explain how your preferred option would better deliver the aims of this policy, how it would be delivered and whether there would be any practical and/or implementation issues that we should be aware of.

Neither

Option 1 is preferred, as data from the Obesity Health Alliance showed that the majority of food and drink products in store entrances, end of aisles and checkout areas are food and drinks that contribute to children's excess sugar and calorie intake¹⁴. We may be open to further restrictions in the future if evidence emerges about other locations contributing to high sales of HFSS products.

21. Do you think that the location restrictions should apply to all of the following locations: store entrances, ends of aisles and checkout areas? Yes/No. Please explain your answer.

Yes, the location restrictions should apply to store entrances, ends of aisles and checkout areas. Products in these areas sell well because they are more visible¹⁵, so if the products in these areas are HFSS they contribute further to the obesity problem¹⁶.

22. Do you currently use or do you know about any official definitions for these locations? Yes/No. If yes, please provide them below.

No

¹³ <https://www.rsph.org.uk/about-us/news/retailers-urged-to-crack-down-on-early-easter-egg-sales-to-tackle-obesity.html>

¹⁴ <http://obesityhealthalliance.org.uk/wp-content/uploads/2018/11/Out-of-Place-Obesity-Health-Alliance-2.pdf>

¹⁵ Wilson A, Buckley E, Buckley J and Bogomolva S. Nudging healthier food and beverage choices through salience and priming: Evidence from a systematic review. Food Quality and Preference 2016. 51:47–64.

¹⁶ Cohen D and Lesser L. Obesity prevention at the point of purchase. Obesity Reviews 2016. 17:389–396

23. Do you think there are other locations inside stores where the restrictions should apply to? Yes/No. If yes, please explain which locations and why.

The restrictions should apply to freestanding gondolas as they are very prominent and make a feature of products, so products placed there are more likely to be purchased¹⁷.

To reduce children's pester power on parents, locations within the eye line of children and young people should be included. In 2016 RSPH asked young people for their views on how to tackle the childhood obesity crisis; one suggestion was to position unhealthy food and drink on higher shelves, away from the eye line of young people¹⁸. Alternatively, the bottom shelf could be utilised; supermarkets often place the cheapest items on the lowest shelf because customers are less likely to bend down to look at these products¹⁹. Moreover, one study found that removing sweets from the checkout, which is directly in the eye line of children, resulted in a 17% decrease in purchases of these products²⁰.

24. Do you think that the location restrictions should apply to all products (whether prepackaged or non-pre-packaged) which fall into the categories included in PHE's sugar and calorie reduction programmes and in the SDIL, and are classed as HFSS (see Annex 3)? Yes/No.

Yes, the restrictions should apply to all products in PHE's reformulation programmes and in the SDIL, and are classed as HFSS.

25. Do you think any other product categories should be included in these restrictions? Yes/No. If yes, please explain which product categories and why.

No, initially it should just apply to the products stated above, but after a review period it could be extended to include other HFSS products that do not currently come under PHE's sugar and calorie reduction programmes and the SDIL.

26. Do you think any of these product categories should not be included? Yes/No. If yes, please explain which product categories and why.

No.

Definitions

27. Do you think that the 2004/5 Nutrient profiling model (NPM) provides an appropriate way of defining HFSS products within the food and drink categories proposed for inclusion in this policy (see Annex 4)? Yes/No. If you answered no, what other ways could we use? Please explain your suggestions.

Yes, the Nutrient Profiling Model is an appropriate way to define the products for inclusion in this policy. Although initially developed to define products that can be advertised to children, it is well understood and could easily be used to define which products should fall under the restrictions of this consultation.

¹⁷ <http://obesityhealthalliance.org.uk/wp-content/uploads/2018/11/Out-of-Place-Obesity-Health-Alliance-2.pdf>

¹⁸ <https://www.rsph.org.uk/uploads/assets/uploaded/403f6527-dd7a-4b7e-8ad62dab7bef33fd.pdf>

¹⁹ <https://www.telegraph.co.uk/finance/personalfinance/money-saving-tips/10289708/How-supermarkets-get-you-to-spend-more.html>

²⁰ <https://www.sciencedaily.com/releases/2018/12/181218171553.htm>

Additionally, other definitions should be considered, such as defining products for inclusion by their calorie content per serving. This may provide an easier alternative for smaller businesses and the out-of-home sector, who don't have access to nutritionists so may find this simpler than using the NPM.

28. Do you think that micro, small, medium and large businesses should be defined by how many employees they have, as defined in the EU recommendation 2003/361 (see Annex 5)? Yes/No.

Yes, businesses should be defined by how many employees they have.

29. Do you think we should consider other ways to define businesses apart from the number of employees, such as floor space/size or turnover? Yes/No. If yes, please explain which methods you think we should consider and why.

NA

Businesses and products out of scope

30. Should the price restrictions apply to the businesses and products below (see Annex 5):

- **Microbusinesses - we recognise it may be too difficult for micro businesses to apply the restrictions**
- **Specialist retailers - we recognise it may be impractical for retailers that only sell one type of product to apply the restrictions**
- **Products that are non- pre-packaged - we recognise it may be impractical for retailers to apply the restrictions when nutritional information is not displayed on the pack for certain products that are sold loose**
- **Meal deals in the retail or out of home sector - we recognise they are generally aimed at adults and they aim to reduce the cost of a single meal**
- **Any other price promotion activity in the out of home sector - we recognise promotions in these settings serve a different purpose to supermarket multibuy promotions and are generally aimed at groups of people eating out together**

Yes/no. Please explain your answer.

Yes, the restrictions should apply to microbusinesses. Although it may be difficult for these businesses to implement the restrictions, they should have to abide by the same rules as larger businesses to send clear messages to customers. For these outlets, a simpler method should be considered for identifying which products should be restricted, such as by calories per serving.

The restrictions should also apply to specialist retailers. Although implementing the restriction may be more difficult for specialist retailers, we believe the restrictions should still apply to them, as they should be on a level playing field with other retailers.

Non-pre-packaged products should also be covered by the restrictions. Many non-pre-packaged bakery products are HFSS, so the restrictions should apply regardless of the packaging.

These restrictions should also apply to meal deals – see response to Question 19.

Price promotion of HFSS products in the out-of-home sector should be restricted following a clear definition of this sector and the products in scope of the restriction. The UK spent over £49bn eating

out in 2017²¹. Although it is not an aim to make it more expensive for people to eat out, many foods and drinks consumed out-of-home are HFSS, and if they were in the retail environment they would be restricted according to this consultation. For example, the pizza chain Domino's has a buy one get one free deal on Tuesdays. It would not be fair to not restrict out-of-home retailers while others must comply with restrictions.

31. Should the location restrictions apply to the businesses and products below (see Annex 5):

- **Very small stores that do not have distinct checkout, front of store and aisle end areas, even if they are part of a chain – we recognise it may be impractical for small outlets to apply the restrictions because they may not have distinct areas**
- **Specialist retailers – we recognise it may be impractical for retailers that only sell one type of product to apply the restrictions**
- **Non-pre-packaged products – we recognise it may be impractical for retailers to apply the restrictions when nutritional information is not displayed on the pack for certain products that are sold loose**

Yes/no. Please explain your answer.

These restrictions should apply to very small stores. Although it may be more difficult for these stores to apply the location restrictions, they should aim to do so to create a level playing field for all businesses.

It may be impossible for specialist retailers that only sell one type of product to apply the location restrictions.

The location restrictions should apply to non-pre-packed products as many of these products are HFSS.

32. Are there any other businesses and/or products that should be out of scope of the price and location restrictions? Yes/No. If yes, please explain which businesses and/or products and why.

No.

Policy implementation

33. How much time would businesses need to prepare for implementation? Please explain your answer.

Businesses should be given one year to prepare for implementation, with smaller businesses given an additional year.

34. DHSC will provide guidance and methodology that will help businesses to know which products can or cannot be promoted. What other support is needed to put this policy into practice?

Staff should be provided with educational tools and training if necessary.

35. Would these restrictions cause any implementation or other practical issues for particular businesses that we have not considered in this consultation? Yes/No. If yes, please explain what

²¹ <https://uk.kantar.com/consumer/shoppers/2018/the-uk-spent-over-%C2%A349bn-on-eating-and-drinking-out-last-year/>

the likely issues are and provide evidence and suggestions of how the issues could be mitigated for these businesses.

NA

36. We welcome views through the consultation on possible approaches to enforcement. Do you have any suggestions for how we can enforce the restrictions in a way that is fair to businesses?

The restrictions could be enforced by Trading Standards Officers. RSPH has called for a review of supermarket regulation²², due to the current ambiguous regulatory landscape.

Impact Assessment questions

To assess the potential impact of the proposed policies, we have produced two Impact Assessments (IA). These documents can be found on the main consultation page on Gov.uk. The IAs include modelling of a range of options to restrict promotions of HFSS products by location and by price. Through this modelling we established the best options to pursue and seek stakeholders' views on. As a result, we are not consulting on all the options that were modelled in the IAs.

The following questions will help us gather further evidence and gain insight into the issues raised in the impact assessments.

Please note that any information you provide may be used in our final IA that will be published.

General IA questions

37. We have calculated illustrative transition costs in both impact assessments. Do these calculations reflect a fair assessment of the costs that would be faced by your organisation/business? Yes/No. If no, please provide any further evidence which could be used to improve our estimates.

If you are referring to a specific calculation in one of the IAs, please state which one(s).

NA

38. Are you aware of any other data sources on sales in the out-of-home food market and the nutritional content of the products sold? Yes/No. If yes, please provide details of the information contained in the data set and the provider.

NA

39. Are you aware of any other data sources available which would improve our estimates of the number of food retailers and out-of-home food outlets? Yes/No. If yes, please provide details of the information contained in the data set and the provider.

NA

40. How will these proposals affect the relationships between manufacturers and retailers (e.g. sales agreements, sales targets, the future relationships and profitability)? Please provide further evidence which could be used to improve our understanding.

NA

²² <https://www.rsph.org.uk/about-us/news/supermarkets-found-to-be-marketing-products-as-healthy-that-are-nutritionally-poor.html>

41. Is it reasonable to assume that retailers and out of home businesses are inspected by Trading Standards every 3.5 and 2 years, respectively? Yes/No. If no, please provide further evidence which could be used to improve our estimates.

Inspections of retailers and out-of-home businesses should be more frequent than every 3.5 and 2 years. Trading Standards Officers should be given more resources for checking that businesses are complying with the restrictions.

42. Is there any additional evidence that would improve our understanding of the level of compensating behaviour which might occur? Yes/No. If yes, please provide further evidence which could be used to improve our estimates.

NA

43. Do you have any further evidence or data you wish to submit for us to consider for our final impact assessment or any specific comments on the methodology or assumptions made? Yes/No. If yes, please provide further evidence which could be used to improve our estimates.

If you are referring to a specific IA question or calculation, please state which one(s).

NA

Location restrictions IA

44. Is our assessment of the major supermarkets' approach to placing HFSS food and drinks at checkouts accurate? Yes/No. If no, please provide further evidence which could be used to improve our understanding.

NA

45. Is there evidence to suggest that smaller retailers are voluntarily restricting the placement of HFSS food and drinks in stores? Yes/No. If yes, please provide further evidence which could be used to improve our understanding.

NA

46. Is there any additional evidence that would improve our estimates of the use of location promotions within the domestic retail or out of home markets, the sales uplift they provide and proportion of sales they represent? Yes/No. If yes, please provide further evidence which could be used to improve our estimates.

NA

Price restrictions IA

47. Is it reasonable to assume that businesses will switch to using price cuts instead of volume offers to promote HFSS products? Yes/No. If no, please provide further evidence which could be used to improve our understanding.

It can be assumed that businesses will switch from volume based promotions to price cuts to promote HFSS products because this is already happening. For example, Pepsi already does this; on the Tesco website, accessed on 5th April 2019, Pepsi Max 8x330ml was price cut from £3.50 to £2.50.

48. To what extent are price promotions offered in the out of home sector? Please provide evidence which could be used to improve our understanding.

Meal deal vouchers are frequently found in newspapers, magazines, and on flyers. For instance, The Independent Voucher Codes, accessed on 5th April 2019, offered a McDonald's wrap of the day for £1.99. For this reason, price promotion in the out-of-home sector should be clearly defined and included in the restrictions.

49. Do consumers respond in a similar way to price promotions offered in the out of home sector and those offered in supermarkets? Please provide further evidence which could be used to improve our understanding.

NA

50. Is the approach used in the impact assessment suitable for assessing the impact on consumers and specifically for assessing the impact on consumer surplus? Yes/No. If no, please provide further evidence which could be used to improve our estimates.

NA

51. How would retailers adjust their promotion strategies to meet the 80/20 target?

NA

Equalities Assessment questions

To assess the potential impact of the policies proposed in Chapter 2 of the Government's Childhood Obesity Plan against the Government's duties under the Equality Act 2010 a separate Equality Analysis has been produced.

52. Do you think that the proposed policy to restrict promotions of HFSS products by location and by price is likely to have an impact on people on the basis of their age, sex, race, religion, sexual orientation, pregnancy and maternity, disability, gender reassignment and marriage/civil partnership? Yes/No. If yes, please explain your answer and provide relevant evidence.

NA

53. Do you think that any of the proposals in this consultation would help achieve any of the following aims:

- **Eliminating discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010**
- **Advancing equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it?**
- **Fostering good relations between persons who share a relevant protected characteristic and persons who do not share it?**

Yes/No

NA

54. If you answered yes to the previous question, please explain which aims it would help achieve and how.

NA

55. If you answered no to the previous question, could the proposals be changed so that they are more effective? If yes, please explain what changes would be needed.

NA

56. Do you think that the proposed policy to restrict promotions of HFSS products by location and by price would be likely to have an impact on people from lower socioeconomic backgrounds? Yes/No. If yes, please explain your answer and provide relevant evidence.

Yes, people from lower socio-economic backgrounds are more likely to be affected by the proposed restrictions, as unhealthy foods such as those included in the scope of this consultation are on average three times cheaper than healthy foods²³.

Further points

57. Is there anything else that you would like to tell us or any more information that you would like to provide for this consultation?

The Royal Society for Public Health (RSPH) is an independent health education charity, dedicated to protecting and promoting the public's health and wellbeing. We are the world's longest-established public health body with more than 6,500 members drawn from the public health community both in the UK and internationally. Our operations include an Ofqual recognised awarding organisation, a training and development arm, and health and wellbeing accreditation. We also produce a wide-variety of public health conferences; our publishing division includes the internationally renowned journal Public Health; and we are developing policy and campaigns to promote better health and wellbeing. For more information visit www.rsph.org.uk.

We welcome this consultation because of the evidence of the effects price promotion and location of HFSS products have on levels of obesity. RSPH is well placed to provide comment on this consultation because of the work we have done in this area: The Child's Obesity Strategy gathered young people's views on how to tackle the childhood obesity crisis²⁴, and Size Matters examined the impact of upselling on weight gain²⁵.

²³ <https://foodfoundation.org.uk/wp-content/uploads/2019/02/The-Broken-Plate.pdf>

²⁴ <https://www.rsph.org.uk/uploads/assets/uploaded/403f6527-dd7a-4b7e-8ad62dab7bef33fd.pdf>

²⁵ <https://www.rsph.org.uk/uploads/assets/uploaded/055c2d87-c3ab-4dfb-ba4aa44b9488c88f.pdf>