

19th March 2019

Response sent via email childhood.obesity@dhsc.gov.uk

RCN response to DHSC Consultation on restricting promotions of products high in fat, sugar and salt by location and by price

With a membership of around 435,000 registered nurses, midwives, health visitors, nursing students, health care assistants and nurse cadets, the Royal College of Nursing (RCN) is the voice of nursing across the UK and the largest professional union of nursing staff in the world. RCN members work in a variety of hospital and community settings in the NHS and the independent sector. The RCN promotes patient and nursing interests on a wide range of issues by working closely with the Government, the UK parliaments and other national and European political institutions, trade unions, professional bodies and voluntary organisations.

All nursing and midwifery staff are very aware that obesity is a major issue across the UK. They provide a key role in identifying those at risk from weight gain and play a vital role in offering advice and support to help people achieve a healthy weight and adopt a healthy lifestyle.

The RCN welcomes this consultation on restricting the promotion of unhealthy food and drink. As a member of the Obesity Health Alliance (OHA) we believe that legislative support is necessary to support tackling obesity. This is a positive step towards the Government's ambition of halving childhood obesity by 2030. Health Visitors and School Nurses particularly support families and children to adopt healthier eating and these changes to the retail and out of home environment will help to reinforce those messages.

This response to the consultation from the RCN presents a wider view and endorsement of the overall policy, rather than provide a response to individual questions.

We believe that from a health perspective, there is a clear need for legislation and financial incentives to support business to adopt and support healthier eating. The RCN supports the broad aims of the consultation. These are in line with our aims in providing support for our

members in their work with people to lose weight and to reduce the burden of ill health caused by obesity. These include:

- Restricting price promotions of food and drinks high in fat, sugar and salt (HFSS) that specifically encourage overconsumption, such as multi-buy offers (e.g. buy one get one free) and free refills of sugary soft drinks;
- Restricting the placement of all HFSS food and drink products (whether pre-packaged or non-pre-packaged) at key selling locations such as store entrances, checkouts and aisle ends which can lead to peer power and impulse purchases of HFSS products;
- Shifting the balance of promotions towards healthy options and maximising the availability of healthy products that are offered on promotion, to make it easier for parents to make healthier choices when shopping for their families.

In terms of the options laid out in the consultation, the RCN would support option 1: - Require retailers to ensure that all their volume based price promotions on food and drink are on healthier products.

It is encouraging to see the proposals to restrict the promotion and marketing of unhealthy food and drink products through regulation. Mandatory measures which will restrict all volume based price promotions that encourage consumers to buy more HFSS products is to be welcomed. The evidence clearly shows that volume based price promotions do not save consumers money, but actually lead to people buying more¹. Option 1 will provide the greatest health benefit² helping to reduce calorie consumption and provide the clearest message to families trying to make healthy choices.

We are concerned that option 2, would not provide a clear enough process and does not adequately define what would constitute healthier food and would in our opinion leave too much scope and potential confusion to the public. Ideally, however, we would want to see more promotions on fruit, vegetables and other healthy food staples, that are part of the Eatwell guide³.

The restrictions should apply to all retail businesses in England that sell food and drink products to ensure the greatest health benefits. It is clear that price promotions can increase the total amount of household food and drink purchased and encourage people to buy and eat more than they need⁴.

We would also support the restrictions applying to promotions for food consumed out of the home. There is clear evidence showing larger portion sizes increase consumption and encourage people again to eat more.⁵ Unlimited refills incentivise larger portions to ensure the customer is getting value for money.

Many of our members are also exposed to promotions in outlets based in hospitals or struggle with vending machines which only offer HFSS options.

We would like to see access to healthier food choices far more readily available and support the recommendation to restrict these HFSS foods in prime locations. Where products are positioned in shops has an impact on how likely we are to buy them. The visibility of products in a retail environment has a nudging effect on shoppers and ultimately influences which products they choose to buy⁶.

**Royal College of Nursing
of the United Kingdom**
20 Cavendish Square
London W1G 0RN
Telephone +44 (0) 20 7409 3333
RCN Direct 0345 772 6100
www.rcn.org.uk

Patron
Her Majesty the Queen
President
Dr Cecilia Akrisie Anim CBE, RGN, DPSN
Chief Executive & General Secretary
Janet Davies BSc (Hons), MBA, RGN, RMN, FRCN

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In terms of the options for restrictions on location based promotions laid out in the consultation, we support option 1. The adoption of Option 1 would discourage the impulse purchase of unhealthy foods and help minimise the pester purchases made by parents where children see the promotions⁷.

We welcome the intention within this consultation to restrict the promotion of unhealthy food and drink.

Helen Donovan

Professional Lead for Public Health Nursing

¹ Sugar Reduction: The evidence for action - Annexe 4: An analysis of the role of price promotions on the household purchases of food and drinks high in sugar. <https://www.gov.uk/government/publications/sugar-reduction-from-evidence-into-action>

² Restricting volume promotions for HFSS products: impact assessment <https://www.gov.uk/government/publications/restricting-volume-promotions-for-hfss-products-rpc-opinion>

³ Eatwell Guide <https://www.gov.uk/government/publications/the-eatwell-guide>

⁴ Public Health England. Sugar Reduction: The evidence for action. Annexe 4: An analysis of the role of price <https://www.gov.uk/government/publications/sugar-reduction-from-evidence-into-action>

⁵ Zlatevska N, Dubelaar C, Holden SS. Sizing up the effect of portion size on consumption: a meta-analytic review. Journal of Marketing 2014;78:140–54.

⁶ Wilson A, Buckley E, Buckley J and Bogomolva S (2016): Nudging healthier food and beverage choices through salience and priming: Evidence from a systematic review. Food Quality and Preference. 51:47–64.

⁷ British Dietetic Association and Children's Food Campaign, 2013. Available at: <http://www.foodingredientsfirst.com/news/bda-calls-for-uk-government-action-to-chuck-junk-food-off-the-checkout.html>

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