

## **DR SINÉAD FUREY, ULSTER UNIVERSITY - WRITTEN EVIDENCE (FDO0018)**

Thank you for the opportunity to respond to the above call for evidence. My comments are attached and focus on the effectiveness of Government planning and policymaking processes in relation to food and drink policy and tackling obesity. I hope you find them useful.

Thank you for considering this submission and please do not hesitate to be in touch should you require any additional information or clarification.

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## **The effectiveness of Government planning and policymaking processes in relation to food and drink policy and tackling obesity.**

UPFs are contributing to obesity, principally because they are 'cheap' sources of calories, less satiating and are readily available, supported by aggressive and well-funded advertising. In contrast, what is needed is up-stream regulatory measures to alter supply and demand given the dominance of supermarkets and the predominance of UPFs within them. Consideration should be given to requiring supermarkets to mandatorily report UPF sales as a proportion of all sales in order to help judge the balance between healthy unprocessed foods and processed foods. Transparent criteria (e.g., front of pack nutrition labelling) should be used to assess nutritional quality and increase the proportion of sales from nutritious food by making healthy foods more accessible (See Ulster university research below).

Ulster University completed two food retail promotion research projects available at:

[http://www.consumercouncil.org.uk/sites/default/files/original/Research\\_Report\\_a\\_three\\_stage\\_investigation\\_into\\_the\\_balance\\_of\\_healthy\\_versus\\_less\\_healthy\\_promotions\\_among\\_NI\\_Food\\_Retailers\\_March\\_2016.pdf](http://www.consumercouncil.org.uk/sites/default/files/original/Research_Report_a_three_stage_investigation_into_the_balance_of_healthy_versus_less_healthy_promotions_among_NI_Food_Retailers_March_2016.pdf);

and

[https://www.safefood.net/getattachment/4c20a9d5-10e5-4169-acce-0b771c2ae6de/Whats-on-offer\\_Accessible.pdf?lang=en-IE](https://www.safefood.net/getattachment/4c20a9d5-10e5-4169-acce-0b771c2ae6de/Whats-on-offer_Accessible.pdf?lang=en-IE).

- We support the restriction of volume-based price promotions of high fat, sugar and salt (HFSS) foods and drink
- Ulster's research in Northern Ireland identified that healthy and less healthy items were equally frequently on promotional offer (in-store and online) based on the Front of Pack scoring method i.e. (52.5% categorised as amber/green and 47.5% of products categorised as red).
- Ulster's research in the Republic of Ireland found that more than one-third (35%) of the total sample of food and drinks audited were categorised as high in fat, sugar and salt, a clear over-representation of their distribution in the food pyramid. This figure increased to 56.1% for the amount of high fat, sugar and salt foods on promotion in convenience stores. The online audit of food promotions (n = 786) similarly concluded an over-representation of foods high in fat, sugar and salt on promotion, particularly during the winter season. Most promotions were price-based i.e. reduced price or volume-based i.e. receiving more of a product for the regular retail price. HFSS foods were almost equally located in promotional areas (34.8%) and regular (non-promotional) locations (35.3%). The majority of consumers reported that they regularly bought food on promotion (91.6%) and showed a preference for "price reductions that offer a cost saving" (92.9% reported buying these always, almost every time, occasionally or sometimes) and volume-based ("Buy One get One Free") types of

promotions (85.4%). All shoppers (n=50) displayed a level of awareness regarding the availability of promotions on offer but engaged with them differently.

- Importantly, when considering the health of consumers' diets, we believe that it is vital to decide on the definition of a balanced promotional diet. For example, a reasonable health-focused proposal would be that promotions in-store should reflect government recommendations e.g. Eatwell Guide, where the great majority of promoted items are green/amber and only a very small percentage (e.g., 10%) are red items.
- The placement of HFSS food at main selling locations in stores, with specific emphasis placed on aisle ends and dedicated promotional stands should be restricted.

Alternatively, we need to reduce reliance on UPFs within a healthy eating lifestyle that re-traditionalises eating practices by recommending limiting UPF consumption (and increasing consumption of minimally processed foods) in any revised obesity prevention strategies or public health messaging (inter)national. This could be achieved by prioritising, subsidising and promoting unprocessed and minimally processed foods and taxing UPFs. However, to do so necessarily involves strategising around ensuring affordable food is accessible to all. There must not be a two-tier food system whereby only some can afford to buy and eat healthy, minimally processed and sustainable food. Food poverty (also known as food insecurity) is the inability to afford or access a healthy diet (Radimer *et al.*, 1992), and has been recognised as a public health emergency (Taylor-Robinson *et al.*, 2013; Furey, 2019). Some mechanism needs to be in place to ensure that the food system is secure, sustainable and healthy because, paradoxically, those consumers who stand to benefit most from a healthy diet are those who can least afford it. It could be deemed that the business case for preventative measures writes itself because it is simply too cost prohibitive not to take action (Caraher and Furey, 2018).

### **Additional sources**

- Beacom, E., Hollywood, L., McLaughlin, C., Furey, S., Price, R., McMahon-Beattie, U. and Burns, A. (2021) Investigating the healthiness of food products on promotion: market brands and own brands. *British Food Journal*. ISSN: 0007-070X
- Caraher, M. and Furey, S. (2018) [\*The Economics of Emergency Food Aid Provision: A Financial, Social and Cultural Perspective\*](#) London: Palgrave Macmillan eBook ISBN: 978-3-319-78506-6; DOI: 10.1007/978-3-319-78506-6; Hardcover ISBN: 978-3-319-78505-9.
- Caraher, M., Furey, S. and Wells, R. (2023) *Food policy in the United Kingdom: an introduction. First edition*. London: Routledge. ISBN: 9781032196770 (paperback)/ 9781032196824 (hard back)/ 9781003260301 (e-book).

- Furey, S., McLaughlin, C., Hollywood, L., Burns, A., McMahon-Beattie, U., Price, R., Humphreys, P., McCarthy, M., Collins, A., Raats, M., Tatlow-Golden, M., Dean, M. and Murrin, C. (2019) *What's on offer? The types of food and drink on price promotion in retail outlets in the Republic of Ireland*. Cork: **safefood**. [ISBN: 978-1-905767-86-1]  
(available from:  
<https://safefood.eu/SafeFood/media/SafeFoodLibrary/Documents/Publications/Research%20Reports/Whats-on-offer.pdf>.)
- Hollywood, L., Furey, S., Burns, A., McMahon-Beattie, U., Price, R., Duffy, M Dowler, E., Livingstone, B., Humphreys, P, Moore, C. and McCullagh, F. (2015) *A three-stage investigation into the balance of healthy versus less healthy food promotions among Northern Ireland food retailers – final report to Food Standards Agency in Northern Ireland*.

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