

NATURAL SOURCE WATERS ASSOCIATION (NSWA)- WRITTEN EVIDENCE (FDO0070)

Questions and NSWA Responses

Question 7 - Lessons learned from international policy and practice, and from the devolved administrations, on diet-related obesity prevention.

In June 2023 the Welsh Government [announced](#) its plans to bring forward legislation to restrict the placement and price promotions for HFSS products in retailers with over 50 staff members. This legislation, [will be brought forward](#) in the autumn of 2024, with a further 12-month implementation period for business up to the end of 2025. The purpose of this legislation is not to ban meal deals as a concept, but to make them healthier and more nutritionally balanced. Research Public Health Wales which profiled 2 million meal deals in Wales found that three-quarters of them exceeded the recommended level of calories for lunch. The least healthy options of these would provide two-thirds of daily calorie intake, over 122 per cent of daily fat intake, 149 per cent of sugar, and 112 per cent of salt.

The Welsh Government have argued that whilst meal deals offered a convenient option for “time-poor” customers, the options that are available in the promotion are often high in fat, sugar or salt, and therefore shoppers are being “incentivised to overconsume”. These price promotions also increase the amount of products that are bought and consumed by about a fifth, and as these products often are higher in fat and sugar this equates to tens of thousands of additional calories being consumed by the average person every year.

Similarly the Scottish Government has launched a [consultation](#) seeking views on proposed regulations to restrict the promotions of HFSS foods where they are sold to the public, including around meal deals.

Legislation around meal deals and the promotion of HFSS products within them would be supportive of recommendations made by [Public Health England](#) in 2015, which showed that the UK’s population is consuming too many drinks high in sugar, with almost 25% of adults classed as obese. Further to this, treating obesity and the associated consequences currently costs the NHS [£6.1 billion](#) every year, therefore a focus on encouraging healthier choices would help to save the taxpayer millions.

The research also found that food retail price promotions are more widespread in Britain than anywhere else in Europe, with foods on promotion accounting for around 40% of all expenditure on food and

drinks consumed at home, and products with higher sugar are promoted more than other foods. These price promotions increase the amount of food and drink people buy by around one-fifth, and these are purchases people would not make without the in-store promotion. The research called for a reduction in the number and type of price promotions in all retail outlets.

Products that have a healthier nutritional value should be prioritised for inclusion in promotional deals, such as meal deals, instead of HFSS products to help create a healthier consumer environment. Due to the well-documented effect of sugary drinks on obesity, particularly for children, natural source water is a healthy alternative for the meal deal promotional package. [Natural source waters](#) are the healthiest choice on the shelf as they do not contain any additives or sugars.

Incentivising natural source water in meal deals will also increase healthy hydration habits. This is particularly important in children, as instilling healthy hydration habits early on in childhood will mean that they are more likely to carry these habits through to adulthood.

Question 8 - The effectiveness of Government planning and policymaking processes in relation to food and drink policy and tackling obesity.

The government's Soft Drinks Industry Levy, and restrictions on the [location and promotion](#) restriction of HFSS products, are vital to meet the government's ambitions to [reduce childhood obesity](#).

Recently, we have seen an increasing focus on preventative healthcare, as set out in [the NHS Long Term Plan](#). Restrictions placed on HFSS products, and promotion of healthier alternatives, such as natural source waters, in their place, are well-placed to support this new focus on preventative measures to help ease pressure on the NHS and create a healthier society.

Research by Public Health Wales in 2023 revealed 75% of meal deals they examined exceed recommended calories for lunch. In a recent survey of 1,000 lunchtime meal deal buyers conducted by Censuswide for the Natural Source Waters Association 39% of people said they bought a fizzy drink, still fruit drink, sports or energy drink, all of which contain sugar. About the same amount said they bought a diet fizzy drink or natural source water. However, 79% said they thought retailers should do more to encourage healthy choices in meal deals with a further discount and loyalty scheme points being the most popular incentives. The English, Scottish and Welsh Governments have all explored legislation to restrict unhealthy options in meal deals but progress has paused in the wake of COVID and the cost of living crisis.

Question 9 - The impact of recent policy tools and legislative measures intended to prevent obesity.

In 2018 the UK Government implemented the Soft Drinks Industry Levy, which is a two-tier sugar tax targeted soft drink manufacturers with the aim to incentivise them to reduce sugar content in their products. The impact of this Levy so far has been significant. The soft drink industry had responded by [reformulating](#) their products, with 8 out of the top 10 companies reducing the sugar content of their products by 15% or more. The [percentage](#) of drinks with sugar levels over the tax threshold also fell from 49% to 15%. There was also a [weekly reduction](#) of 30g per household in sugar purchased from soft drinks that were taken home, which is equivalent to a reduction of sugar consumption of 12.5 grams per person per week.

Research by the University of Cambridge [showed](#) that the introduction of the levy was associated with an 8% relative reduction in obesity levels in Year 6 girls, equivalent to preventing 5,234 cases of obesity per year in this group. Further to this, reductions were greatest in girls whose schools were in deprived areas, with those living in the most deprived areas seeing a 9% reduction.

The success of this levy illustrates clearly that action taken on sugary drinks has a direct correlation to obesity rates. In this case, it is important to capitalise on this effort and push forward with action through the promotion of healthy alternatives in the place of these sugary drinks. [Natural source waters](#) are the healthiest choice on the shelf as they do not contain any additives or sugars.

8 April 2024