



Consultation on restricting promotions of products high in fat, sugar and salt

Launch date: 29 July 2026

Respond by: 21 October 2026

This consultation will be of most interest to

- Large retailers, supermarkets, convenience stores and non-grocery retailers that also sell food (DIY shops, clothing stores and pharmacies).
- Online retailers selling food and drink products.
- Out-of-home food businesses.
- Trade associations representing food retail, food manufacturing and the out-of-home sector.
- Public health organisations, NGOs and consumer advocacy bodies.
- Local councils.
- The general public.

Purpose of the consultation

In Northern Ireland, the Food Standards Agency and the Department of Health are considering the introduction of legislative restrictions on the promotion and placement of food and drink high in fat, sugar and salt (HFSS). Regulations to restrict the promotion of HFSS products by location and volume price have already been implemented in England and Wales, and Scotland are introducing restrictions in October 2026.

Evidence shows that:

- Volume-based price promotions, such as multibuy, significantly increase purchasing and overconsumption of HFSS food, particularly among children¹.
- Placement of HFSS products in prominent locations increases impulse purchasing and contributes to unhealthy dietary patterns².
- The consumption of HFSS food and drink is a key driver of overweight and obesity, which in turn increases the risk of diet related noncommunicable diseases including type 2 diabetes, cardiovascular disease and some cancers².

The purpose of this consultation is therefore to seek views on proposed measures to:

- Reduce people's exposure to HFSS promotions and impulse purchase drivers.
- Support healthier shopping environments and shift the balance of promotions to increase the affordability of healthier options.
- Ensure Northern Ireland maintains policy coherence with the rest of the UK food market to minimise complexity for industry.

¹ Public Health England (2015) 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://assets.publishing.service.gov.uk/media/5a7f9a6040f0b623026907cd/Annexe_4_Analysis_of_price_promotions.pdf

² Department of Health and Social Care (2020; updated 2025). Impact assessment: Restricting checkout, end of aisle and store entrance sales of HFSS products.
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1008423/impact-assessment-restricting-checkout-end-of-aisle-and-store-entrance-sales-of-HFSS.pdf

How to respond

Views are invited on the questions set out throughout this consultation document.

Responses can be submitted via the online questionnaire available at

<https://consultations2.nidirect.gov.uk/doh-1/consultation-on-restricting-promotions-of-hfss>

Alternatively, please send your response to Executive.Support@food.gov.uk

Or write to:

Food Standards Agency in Northern Ireland

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Details of consultation

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1. Glossary of terms

HFSS (High Fat, Sugar or Salt): Food and drink products classified as “less healthy” using the UK Nutrient Profiling Model (NPM), based on their nutritional composition.

Nutrient Profiling Model (NPM): A nutrient scoring system used to classify food and drink products as HFSS or non-HFSS. Products are assessed per 100g using a points-based approach, in which points are awarded for nutrients that should be limited, including energy, saturated fat, sugars and salt (known as ‘A’ points), and for beneficial components, including fruit and vegetable content, fibre and protein (known as ‘C’ points). The final nutrient profile score is calculated by subtracting ‘C’ points from ‘A’ points, and this score determines whether a product is classified as HFSS.

The model was originally developed in 2004-2005 and is currently used in UK policy. An updated version of the model, published in 2018, was developed to reflect advances in nutrition science and dietary guidance. The 2018 model replaces total sugars with free sugars, includes seeds alongside fruit, vegetables and nuts, increases the weighting given to fibre, and updates the scoring thresholds for key nutrients.

HFSS promotion restrictions: Legislative measures that limit how HFSS food and drink products may be promoted, including restrictions on price-based promotions and product placement.

Volume price promotions: Promotions that encourage the purchase of larger quantities or multiple units of a product through a financial incentive, including multibuy offers, such as “3 for 2” or “2 for £3” and additional volume offers, such as “buy one get one free”, “50% extra free”, or similar offers linked to purchasing multiple items.

Placement restrictions: Restrictions on the positioning of HFSS products in specific high-visibility areas of retail environments, intended to reduce impulse purchasing.

Prominent locations: Areas within retail environments that are designed to attract attention or encourage impulse purchases. For the purposes of this consultation, these include: store entrances and covered external areas; checkouts and checkout queuing areas; and ends of aisles. Equivalent online locations are also included.

Online equivalent locations: Digital retail spaces that perform a similar function to prominent in-store locations, including homepages, landing pages, pop-up promotions, basket pages and checkout pages on websites or apps.

Free refills: Promotions allowing unlimited or repeated refills of a drink for a single fixed price, commonly referred to as “bottomless drinks”. In this consultation, this term relates specifically to sugar-sweetened soft drinks that are classified as HFSS.

Prepacked food: Food that is packaged before being offered for sale and remains in that packaging until purchased, in line with retained UK food information legislation.

Non-prepacked food: Food sold loose or packed at the point of sale, such as bakery or deli items. Non-prepacked food is out of scope of HFSS promotion and placement restrictions, except in relation to free refills of sugar-sweetened soft drinks.

Qualifying business: A business that meets the criteria to be in scope of HFSS promotion restrictions, typically determined by employee numbers and, for location restrictions, store size.

Relevant floor area: The internal area of a retail premises used for the sale of food and drink to consumers, excluding staff-only areas, storage areas and other non-public spaces. A threshold of 2,000 square feet (185.8 square metres) is used for the purposes of location-based restrictions.

Franchise arrangement: A business model under which individual outlets operate under a shared brand or agreement. For the purposes of HFSS promotion restrictions, employee numbers may be assessed across the franchise or symbol group as a whole.

Symbol group: A group of independently owned retail businesses operating under a shared trading brand or banner and linked through common supply or operational arrangements.

Out-of-home sector: Businesses that prepare or serve food for immediate consumption away from the home, including restaurants, cafés and takeaways.

Enforcing authority: The body responsible for monitoring compliance with HFSS promotion restrictions.

Implementation period: The period between regulations being made and coming into force, intended to allow businesses and enforcing authorities time to prepare for compliance.

2. Introduction

Obesity

Obesity remains one of the most significant public health challenges facing Northern Ireland. People living with overweight or obesity are at increased risk of a range of serious health conditions, including cardiovascular disease, type 2 diabetes, certain cancers, musculoskeletal conditions and complications during pregnancy³. Obesity has been identified by Cancer Research UK as the second leading preventable cause of cancer, after smoking⁴.

In Northern Ireland, the prevalence of overweight and obesity presents a substantial public health concern. Around 67% of adults and 26% of children aged 2–15 years are living with overweight or obesity⁵. Rates are higher among men than women and are significantly higher in more deprived communities. These inequalities emerge early in life, with obesity levels in Year 1 and Year 8 almost twice as high among children from the most deprived areas than those from the least deprived areas in 2024/2025.

The impacts of excess weight extend across the life course. Even relatively low levels of excess weight are associated with a loss of healthy, disease-free years in adulthood, while children living with obesity are significantly more likely to remain obese into adulthood⁶. In addition to these health impacts, overweight and obesity place a considerable economic burden on society. In Northern Ireland, the combined healthcare and productivity costs associated with overweight and obesity are estimated to be approximately £500 million per year, placing sustained pressure on public services and the wider economy⁷.

³ Department of Health. (2025). Healthy Futures: Obesity strategic framework for Northern Ireland. Northern Ireland Executive. <https://www.health-ni.gov.uk/publications/healthy-futures-obesity-strategic-framework-northern-ireland>

⁴ Cancer Research UK. (2018, September 24). Obesity could overtake smoking as biggest preventable cause of cancer in women. <https://news.cancerresearchuk.org/2018/09/24/obesity-could-overtake-smoking-as-biggest-preventable-cause-of-cancer-in-women/>

⁵ Department of Health. (2025). Health Survey Northern Ireland: First results 2024/25. Northern Ireland Executive. <https://www.health-ni.gov.uk/publications/health-survey-northern-ireland-first-results-202425>

⁶ Simmonds, M., Llewellyn, A., Owen, C. G., & Woolacott, N. (2016). Predicting adult obesity from childhood obesity: A systematic review and meta-analysis. *Obesity Reviews*, 17(2), 95–107. <https://doi.org/10.1111/obr.12334>

⁷ British Heart Foundation Northern Ireland. (2023). The economic impact of smoking, alcohol consumption and obesity in Northern Ireland. <https://www.bhf.org.uk/-/media/files/what-we-do/in-your-area-northern-ireland-pages/ni-cost-to-society-figures-web.pdf>

Obesity is a complex condition, arising from interactions between biological, behavioural and environmental factors. Diet plays a key role, with increased availability and consumption of energy-dense, nutrient-poor foods, larger portion sizes and more eating outside the home driving excess calorie intake. National Diet and Nutrition Survey data for Northern Ireland shows that children and adults across all age groups are eating too much saturated fat and free sugars and not enough fruits, vegetables and fibre.

Healthy Futures

The Department of Health's Healthy Futures obesity strategic framework³ for Northern Ireland sets out a whole-system approach to creating the social and environmental conditions that enable and support people to eat more healthily and be more physically active, while reducing the risk of harm for those living with overweight or obesity. A central principle of Healthy Futures is the reduction of health inequalities, recognising that the burden of overweight and obesity is not evenly shared across society. The high and persistent prevalence of excess weight among both adults and children highlights the need for effective, evidence-based interventions that address the root causes of unhealthy dietary patterns.

The Healthy Futures strategy recognises that improving health outcomes depends on creating the right conditions for people to make healthier choices in their daily lives. The "Healthy Policies" theme focuses on ensuring that health is built into decision-making across government, using policy and regulatory levers to shape the wider environment, reduce inequalities, and support better long-term outcomes.

A central priority within this theme is tackling the impact of foods high in fat, sugar or salt (HFSS), which continue to be a major driver of obesity and diet-related ill health. The strategy aims to reduce the prominence and availability of these products, particularly for children and in more disadvantaged communities, while supporting a shift towards healthier options.

Key actions include scoping the potential to bring forward legislation to restrict the marketing, promotion and placement of HFSS products.

HFSS Promotions

Between 2023 and 2025, there was an increase in HFSS products purchased on promotion in Northern Ireland, with items such as diet soft drinks, yoghurts and fromage frais, chocolate confectionery and crisps and savoury snacks consistently dominating promotional purchasing. Promotional activity within these categories has also grown over

time, for example, chocolate confectionery increased from 29.17% of volume purchased on promotion in 2024 to 34.27% in 2025⁸.

In 2025, almost one fifth of saturated fat (18.3%) purchased by Northern Ireland consumers in retail outlets, was present in HFSS categories on promotion. The share of energy, sugars and salt (kg) purchased through HFSS categories on promotion also increased from 2023 to 2025. This indicates that a growing proportion of less healthy nutrient intake is being driven by promotions on HFSS products⁸.

It is against this backdrop that the Food Standards Agency in Northern Ireland and the Department of Health are seeking views through this consultation on proposals to introduce restrictions on the promotion of HFSS products, including restrictions based on both location and volume price. These proposals form part of a broader approach to create a healthier food environment and to reduce diet-related harm.

Evidence shows that the promotion of HFSS products through price-based incentives, prominent placement and marketing tactics can significantly influence consumer purchasing behaviour, often at the expense of healthier options. Restricting such promotions is recognised as an important lever for shifting food environments towards healthier choices, particularly for children and those living in socio-economically disadvantaged communities.

The UK Government and the devolved administrations have taken steps to improve population diets and recognise the role of the retail environment in shaping dietary behaviours. In 2022, regulations were introduced in [England](#) to restrict HFSS products from appearing in prominent instore and online locations, including checkouts, entrances and aisle ends. Further restrictions on volume price promotions, such as multibuy offers, came into force in October 2025. Further restrictions on volume price promotions, such as multibuy offers, came into force in October 2025.

The Welsh Government has introduced the Food (Promotion and Presentation) (Wales) Regulations 2025, in force from March 2026, which restrict the promotion, placement and pricing of foods high in fat, salt and sugar (HFSS) in larger retail settings (including bans on multibuy offers and prominent in-store positioning); comparable provisions have been legislated in Scotland through the Food (Promotion and Placement) (Scotland) Regulations 2025, which will come into force on 1 October 2026 and similarly restrict the price promotion and prominent placement of HFSS products to support healthier consumer choices.

⁸ Worldpanel by Numerator- Northern Ireland Take Home Panel and Nutrition Service (This document, including any associated analysis and statements, has been produced independently of Worldpanel by Numerator.)

This consultation therefore seeks views on proposals to restrict the promotion of HFSS products by location and by volume price in Northern Ireland, in line with similar measures elsewhere in the UK. This supports a consistent UK-wide approach to creating a food environment that promotes healthier choices and reduces overconsumption of HFSS products.

3. Main proposals

We are seeking views on proposals to restrict the promotion of HFSS products by volume price and location, in line with the legislative regime that is already in place in England and Wales and legislated for in Scotland.

Proposal 1: Restrict volume price promotions on HFSS products

For the purposes of this consultation, we have defined volume-based price promotions as follows:

- Multibuy offers whereby a discount is offered for buying multiple items at once such as '3 for 2', '3 for £10' and similar offers; and
- Additional volume promotions which indicate that an item or part of an item is free such as 'buy one get one free' or '50% extra free' or incentives such as 'buy 3 products and receive 100 loyalty points'.

These measures aim to reduce incentives to bulk buy or purchase larger volumes of HFSS products, thereby decreasing overconsumption.

Proposal 2: Restrict the placement of HFSS products at prominent locations

The proposal includes restricting the placement of HFSS products in the following prominent in-store locations:

- Store entrances and covered external areas;
- Checkouts and checkout queueing areas; and
- Ends of aisles.

To ensure a level playing field across the retail sector, we propose that these restrictions apply to in-store and online shopping. We intend to mirror the location restrictions for online equivalents, for example, by limiting promotions of HFSS products on homepages, landing pages for other food categories, pop up adverts or pages, and shopping basket and checkout pages.

Proposal 3: Restrict free refills of sugar-sweetened soft drinks

These proposals would restrict free refills of sugar-sweetened soft drinks that are classified as HFSS or less healthy under the Nutrient Profiling Model in qualifying businesses across Northern Ireland, including restaurants and other out-of-home settings. Businesses in scope would not be permitted to offer free refill promotions including “bottomless drinks” which are often priced to appear good value when compared to a single serving, such as a bottled or canned soft drink. Such promotions may encourage higher consumption of sugary soft drinks, leading to increased calorie intake.

Restrictions on free refill promotions for sugar-sweetened soft drinks are already in force in England and Wales and will apply from October 2026 in Scotland.

We propose to take the same measures which are intended to support a healthier food environment, reduce barriers to healthy choices, and support a consistent framework across the UK.

Product scope

HFSS products are currently defined using the 2004/05 UK Nutrient Profiling Model, which remains the basis for classifying foods and drinks as “less healthy” across existing advertising and promotions policy in England, Wales and Scotland.

In recent years UK dietary guidance has evolved, particularly regarding free sugars and fibre, and these changes are reflected in the updated [2018 Nutrient Profiling Model](#). The 2018 model was developed following an expert review and incorporates updated recommendations from the Scientific Advisory Committee on Nutrition.

Following the UK Government’s consultation on implementing the 2018 Nutrient Profiling Model, there is now the possibility that future regulations could be based on either the existing 2004/05 model or the updated 2018 version.

As part of this consultation, we will therefore include a specific question on whether stakeholders believe we should:

- Use the existing 2004/05 model;
- Use the updated 2018 model; or
- Use the 2004/05 model and review at a later date.

We propose to use the same product categories as the UK Government, as set out in the Food (Promotion and Placement) (England) Regulations 2021. These categories draw on the product groupings used in Public Health England’s programmes, now led by the Office for Health Improvement and Disparities, including the Calorie Reduction Programme, the Sugar Reduction Programme and the Soft Drinks Industry Levy, and have been streamlined to focus on products of particular concern for childhood obesity.

- Soft drinks
- Chocolate confectionery
- Sugar confectionery
- Cakes
- Ice cream
- Morning goods
- Puddings and dairy desserts
- Sweet biscuits
- Breakfast cereals
- Yoghurts
- Milk based drinks with added sugar
- Juice based drinks with added sugar
- Pizza
- Crisps and savoury snacks
- Ready meals and meal centres including breaded and battered products
- Chips and potato products

In England, Scotland and Wales, the promotion restrictions apply only to prepacked food and drink products within the specified product categories, except for soft drinks refills.

We propose to maintain the same approach, with non-prepacked products remaining out of scope.

Business scope and exemptions

In order to ensure consistency for food businesses, and considering the wider evidence base, we propose taking the same approach as the UK Government in determining which businesses are in scope of the restrictions. Volume price restrictions will apply to retail businesses with 50 or more employees and location restrictions will apply to retail businesses with 50 or more employees, where the store has a relevant floor area of 2,000 square feet or more.

As well as food and drink retailers, other retailers that sell food or drink, even where this is not the main purpose of their business, will also be in scope of the restrictions. This includes but is not limited to DIY stores, pharmacies, clothing stores and garden centres.

We recognise that franchise and symbol group arrangements in Northern Ireland vary, and the terms of these arrangements can differ. As is the case in England, Scotland and Wales, where a business operates under a franchise arrangement, or trades under a symbol group banner, we propose it will be within scope of the restrictions if the franchise or symbol group, taken as a whole, employs 50 people or more, even where individual outlets are independently owned.

We propose that retailers with fewer than 50 employees be exempt from restrictions and stores with fewer than 2,000 square feet of relevant floor area be exempt from location restrictions, regardless of the number of employees.

Businesses such as care homes and schools, as well as food provided by charities in the course of their charitable activities, will be exempt from the restrictions.

Applying the location restrictions would be impractical for specialist retailers that only, or mainly, sell food from a single category of products within scope of the restrictions, for example, chocolatiers or confectioners. Therefore, we propose that specialist retailers be exempt from location restrictions. However, specialist retailers will still be subject to the volume price promotion restrictions.

Although the out-of-home sector is exempt from volume price and location restrictions, businesses with 50 or more employees must comply with restrictions on free refills of sugar-sweetened soft drinks including restaurants, cafes and other out-of-home settings. This restriction also applies to retail businesses with 50 or more employees.

Enforcement

Effective enforcement will be essential to ensure any restrictions on the promotion and placement of HFSS products are applied consistently, proportionately and in line with existing food law practice in Northern Ireland.

In England and Wales, enforcement is carried out by local authorities using traditional food law powers, supported by civil sanctions under the Regulatory Enforcement and Sanctions Act 2008 (RESA), including Fixed Monetary Penalties (FMPs). The relevant parts of RESA do not apply in Northern Ireland. In Scotland, enforcement relies on a stepped approach using existing food law powers only, moving from informal engagement to compliance notices and, where necessary, criminal prosecution.

Enforcement in Northern Ireland would be expected to be undertaken by local councils, consistent with arrangements for other food law controls. Two enforcement approaches are being considered:

Option 1: Enforcement through improvement notices and criminal prosecution only

This option would rely on existing food law powers. Enforcement authorities would adopt a stepped approach, beginning with informal engagement and advice, followed by the use of improvement notices where necessary. Failure to comply with an improvement notice, or serious breaches, may result in criminal prosecution. This approach would require no new enforcement legislation.

Option 2: Explore the introduction of monetary sanctions as an alternative to criminal prosecution

This option allows the policy to be progressed with the enforcement approach outlined in Option 1, while also exploring a legislative route to introducing monetary sanctions as an alternative to prosecution. Monetary sanctions allow enforcement authorities to deal with

minor criminal offences without the need for court proceedings and, importantly for businesses, avoid a criminal conviction.

Monetary sanctions are intended for lower level or first-time breaches, providing a more proportionate and efficient enforcement response, while reserving criminal prosecution for serious or persistent non-compliance.

Under either option, the FSA would provide clear guidance, support a consistent enforcement approach across local councils, and provide a suitable implementation period (for example, 12 months).

4. Impacts

This section sets out the anticipated impacts of introducing restrictions on the promotion and placement of HFSS products in Northern Ireland. It summarises available evidence from other UK nations and invites stakeholders to provide views, data, and insights to inform our final impact assessment.

We welcome qualitative and quantitative evidence from consumers, health organisations, community groups, businesses, enforcement bodies and other interested parties to support or challenge the findings summarised below.

Health Impacts

Our assessment is that restricting the promotion of products high in fat, sugar or salt (HFSS) by location and by volume price has the potential to contribute to improved dietary behaviours and, over time, improved health outcomes across the population.

Dietary patterns in Northern Ireland play an important role in these outcomes. Evidence indicates high intakes of free sugars, saturated fat and overall energy, particularly among children and young people⁹. Price-based promotions and prominent product placement have been shown to influence purchasing behaviour, often encouraging the purchase and consumption of HFSS products^{1,2}. By reducing exposure to these promotional cues, particularly in prominent in-store and online locations, the proposed restrictions may help to support healthier purchasing patterns over time.

We also consider that the proposals may have particular relevance for children and young people, who are more susceptible to marketing and promotional activity, and for communities experiencing higher levels of deprivation. Evidence shows that rates of overweight and obesity are higher in more deprived areas and that exposure to HFSS promotions may be greater in these settings⁶. Measures that address environmental

⁹ Food Standards Agency. (2025). National Diet and Nutrition Survey: 2017 to 2023 report for Northern Ireland. UK Government. <https://www.gov.uk/government/statistics/national-diet-and-nutrition-survey-report-for-northern-ireland>

drivers of food choice therefore have the potential to support improvements in health outcomes while also contributing to a reduction in health inequalities.

Evidence from England indicates that restricting the promotion of HFSS products can reduce calorie consumption and support improved population health outcomes. Modelling undertaken as part of the UK Government's wider obesity strategy estimates that HFSS promotion restrictions could lead to significant reductions in daily calorie intake among overweight and obese adults. These changes are projected to deliver £2.39 billion in health benefits over 25 years, including reduced incidence of diet-related disease¹⁰. If we assume benefits would be similar in Northern Ireland, this could equate to over £70 million locally.

Evaluations of the placement restrictions introduced in England in 2022 have shown early behavioural impacts. Research conducted by the Institute of Grocery Distribution and the University of Leeds suggests that these restrictions resulted in an estimated 2 million fewer in-scope HFSS products sold per day, with 56% of shoppers reporting that they did not notice changes in-store environments¹¹. This suggests that such interventions may shift purchasing behaviour without creating negative consumer experience or resistance.

We are seeking views on the likely scale of health benefits arising from equivalent restrictions in Northern Ireland, and welcome evidence on the potential for reduced calorie consumption, improved nutritional choices, and long-term reductions in obesity and related conditions.

Business Impacts

The proposed restrictions may have implications for retailers, manufacturers and the wider food industry, particularly in relation to promotional strategies and product placement. Over the longer term, any reduction in diet-related ill health could help to reduce pressure on health services and productivity losses associated with overweight and obesity.

FSA mapping research indicates that HFSS promotion restrictions would affect a substantial proportion of food businesses in Northern Ireland, particularly in the grocery sector. The study estimates that 45.7% of grocery retailers would be in scope of location restrictions and 62.5% of volume restrictions, meaning many businesses may need to

¹⁰ Department of Health and Social Care. (2025). Final impact assessment: Restricting promotions of products high in fat, sugar or salt by location and by volume price. UK Government. <https://assets.publishing.service.gov.uk/media/68dba7b78c1db6022d0c9eef/final-impact-assessment-for-restricting-volume-price-promotions-for-HFSS-products.pdf>

¹¹ Institute of Grocery Distribution, & University of Leeds. (2025). Evaluation of the HFSS placement legislation: Impact on sales and consumer behaviour. IGD. <https://www.igd.com/reports/evaluation-of-the-hfss-placement-legislation/7159>

adjust promotional practices and store layouts¹¹. Smaller retailers operating under franchise or symbol group arrangements would also be captured. A smaller proportion of non-grocery retailers would be affected, while impacts in the out-of-home sector are more limited, with only 10.9% of businesses in scope of restrictions on free refills of sugar-sweetened drinks¹². Overall, impacts are expected to vary by business type, with scope for retailers to shift promotions towards healthier alternatives, as has been implemented in other UK nations.

Economic analysis from England suggests that, despite upfront implementation and compliance costs for retailers and manufacturers, the policy delivers long-term net social benefits. In their impact assessment, the Department of Health and Social Care estimates a net present social value (NPSV) of £2.754 billion (equivalent to over £80 million in Northern Ireland), demonstrating the potential for substantial societal gain, even when accounting for costs to industry⁹.

Feedback from Welsh consultations highlights several considerations relevant to Northern Ireland. Businesses, particularly small retailers, emphasised the importance of clear guidance, proportionate enforcement, and adequate lead-in time to support effective implementation. Respondents also noted potential operational challenges, including adjusting store layouts, re-training staff, and understanding the scope of regulated products¹³.

We seek further evidence from businesses of all sizes on:

- anticipated compliance costs;
- expected operational changes;
- supply chain implications;
- the role of voluntary reformulation; and
- any impacts on competitiveness between large and small retailers.

¹² Davis, G., Sharpe, F., McFarland, K., McGonagle, J., & Close, F. (2026). Mapping the food retail and out of home sector in Northern Ireland. Food Standards Agency Research and Evidence.
<https://doi.org/10.46756/001c.144758>

¹³ Welsh Government. (2025). Proposals to make the food environment healthier: Summary of responses to the consultation on the Food (Promotion and Placement) (Wales) Regulations. Welsh Government.
<https://www.gov.wales/proposals-make-food-environment-healthier>

Consumer Impacts

There is evidence that people living in more deprived communities experience higher rates of overweight and obesity and may be more exposed to promotions of HFSS products⁶. At the same time, affordability is an important factor shaping food choice, and some households rely on promotions to manage food budgets^{14,15}.

We consider that restricting promotions on HFSS products, while allowing promotions on healthier products such as fruit and vegetables, has the potential to support healthier choices without increasing food costs overall. However, we recognise that impacts may vary across different socio-economic groups.

Responses to the Welsh consultation indicated that some consumers were concerned about potential cost-of-living impacts, particularly if restrictions were perceived to reduce access to value promotions¹³. However, available evidence from England suggests that HFSS promotions often encourage greater overall spending rather than saving, and that the removal of certain promotions does not necessarily increase household food bills^{10,16}. Stakeholders also reported that shopper experience remained broadly positive following implementation of HFSS placement restrictions, with the majority of consumers not noticing any change.

We invite evidence on:

- potential impacts on household food budgets;
- consumer perceptions of fairness and choice;
- the extent to which promotions influence purchasing behaviour; and
- whether restrictions may support healthier default choices for families.

Evidence gathered through this consultation will inform the final impact assessment and shape decisions on the design and implementation of HFSS promotion and placement restrictions in Northern Ireland.

¹⁴ Food Standards Agency. (2024). Food and You 2: Northern Ireland Wave 7–8 key findings. Food Standards Agency. <https://www.food.gov.uk/research/food-and-you-2/food-and-you-2-northern-ireland-wave-7-8-key-findings>

¹⁵ Food Standards Agency, & YouGov. (2025). Consumer Insights Tracker (July–September 2025). Food Standards Agency Research and Evidence. <https://doi.org/10.46756/001c.145735>

¹⁶ Public Health England. (2015). 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. UK Government https://assets.publishing.service.gov.uk/media/5a7f9a6040f0b623026907cd/Annexe_4_Analysis_of_price_promotions.pdf

5. Engagement and consultation process

Throughout the development of these policy proposals, we have undertaken early and ongoing engagement with a range of stakeholders to ensure the emerging approach reflects operational realities, public health priorities, and enforcement considerations.

Engagement to date has included:

- Retail representatives, including large national chains and independent retail bodies, to understand practical implications of HFSS promotion restrictions, discuss potential implementation challenges, and explore opportunities for policy alignment across the UK. Retailers operating on a UK-wide basis have repeatedly emphasised the importance of policy consistency between nations to minimise compliance complexity and administrative burden, reflecting views raised through the Welsh Government's consultation process.
- Public health organisations, including charities and advocacy groups to ensure the proposals remain aligned with public health objectives and evidence relating to dietary health, obesity, and inequalities.
- Local councils who provided early insight on inspection processes, training needs, communication requirements, and the importance of clear statutory guidance to support consistent enforcement. Learning from implementation in England and Wales highlights that robust, accessible guidance is essential to support both compliance and proportionate enforcement.

This early engagement has helped shape initial policy positions and identify areas where further consultation is required. We welcome additional engagement from all stakeholders through this consultation process.

Following the close of this consultation, we expect further targeted engagement with specific stakeholders to refine the detail of the proposals. This may include:

- Technical discussions with retailers and manufacturers on product classification, nutrient profiling requirements, and operational impacts.
- Workshops with enforcement officers to test draft guidance, explore enforcement pathways, and ensure proportionality.
- Engagement with public health stakeholders to review equity impacts and ensure the proposals support wider population health goals.

A further, more focused consultation will be undertaken on the draft legislation and proposed enforcement arrangements before they are finalised.

Following the consultation, responses will be analysed to identify key themes and inform whether there is sufficient support to progress the proposals. Subject to this, further consultation may take place to refine the approach.

Within three months of a consultation ending, we aim to publish a summary of responses received and provide a link to it from this page.

6. Questions asked in this consultation:

1. Are you responding on behalf of an organisation?

Yes ☐

No ☐

2. If you are responding on behalf of an organisation, please state what type of organisation it is.

Retailer ☐

Out of home food business ☐

Trade association ☐

Public health organisation ☐

NGO ☐

Consumer advocacy body ☐

Local council ☐

Community and voluntary organisation ☐

Not applicable ☐

Other (please add your organisation below) ☐

3. Do you agree that restrictions on the promotion and placement of products high in fat, sugar and salt (HFSS) should be introduced in Northern Ireland?

Yes ☐

No ☐

Not Sure ☐

4. Do you agree that a legislative approach should be considered for Northern Ireland similar to England, Scotland and Wales?

Yes ☐

No ☐

Not Sure ☐

5. Are there any considerations specific to Northern Ireland that should be taken into account regarding the proposals in this consultation?

6. Do you agree with the proposed product categories that would be subject to HFSS promotion restrictions in Northern Ireland?

Yes ☐

No ☐

Not Sure ☐

7. Do you agree that non-prepacked products should remain out of scope (consistent with England, Wales and Scotland), except for soft drink refills?

Yes ☐

No ☐

Not Sure ☐

8. Which approach should be used to determine which products are in scope of restrictions? Option 1) Use the existing 2004/05 Nutrient Profiling Model; Option 2) Use the updated 2018 Nutrient Profiling Model; or Option 3) Use the 2004/05 Nutrient Profiling Model and review at a later date.

Option 1 ☐

Option 2 ☐

Option 3 ☐

- 9.** Do you have evidence on the challenges or operational issues businesses may face if the 2018 Nutrient Profiling Model is applied in Northern Ireland, including impacts on product classification?

- 10.** Do you agree with the proposal to restrict multibuy and volume promotions (e.g., “3 for 2”, “BOGOF”, extra-free offers) for HFSS products in Northern Ireland?

Yes ☐

No ☐

Not Sure ☐

- 11.** Do you agree with restricting the placement of HFSS products in the following in-store locations: a) store entrances; b) covered external areas; c) checkouts and queuing areas; and d) aisle ends?

Yes ☐

No ☐

Not Sure ☐

- 12.** Do you agree that equivalent restrictions (both volume price and location) should apply to online retail environments (e.g., homepages, pop-ups, checkout pages)?

Yes ☐

No ☐

Not Sure ☐

- 13.** Do you agree with prohibiting free refills of sugar sweetened soft drinks in Northern Ireland?

Yes ☐

No ☐

Not Sure ☐

14. Do you agree that the volume price and location restrictions should apply only to retailers with 50 or more employees?

Yes ☐

No ☐

Not Sure ☐

15. Do you agree that location restrictions should apply only to stores with a relevant floor area of 2,000 square feet or more?

Yes ☐

No ☐

Not Sure ☐

16. Should specialist retailers that sell one type of food product e.g. chocolatiers or confectioners, be exempt from location restrictions?

Yes ☐

No ☐

Not Sure ☐

17. Do you agree with the proposed exemptions (e.g., micro and small businesses, care homes, educational settings)?

Yes ☐

No ☐

Not Sure ☐

- 18.** Do you have evidence on how the proposals may impact small and micro-businesses that may be in scope due to an association with a franchise or symbol group?

- 19.** Do you agree that local councils should be the enforcing authorities for HFSS promotion restrictions in Northern Ireland?

Yes ☐

No ☐

Not Sure ☐

- 20.** Which enforcement approach do you consider most appropriate for Northern Ireland, and why? Option 1) Enforcement through improvement notices and criminal prosecution only; or Option 2) Explore the introduction of monetary sanctions as an alternative to criminal prosecution (while progressing the policy initially with the approach outlined in Option 1).

Option 1 ☐

Option 2 ☐

Why did you choose option1 or 2

- 21.** If local councils were to enforce the policy, what resources do you think would be required to support enforcement?

22. Do you have evidence on any challenges that may affect the ability to enforce the policy in a proportionate and consistent way in Northern Ireland?

23. Do you agree that a lead in period of 12 months is appropriate to allow preparation for implementation of the policy?

Yes ☐

No ☐

Not Sure ☐

24. Are there specific operational barriers that should be considered when determining implementation timelines?

25. Do you have evidence on the potential health impacts of the proposed restrictions in Northern Ireland?

26. Do you have evidence on how the proposed restrictions may impact businesses, including compliance costs, operational and supply chain impacts, product reformulation, and competitiveness between larger and smaller retailers?

27. Do you have evidence on the potential impacts of the proposed restrictions on consumers, including impacts on household food budgets, consumer perceptions of fairness and choice, the extent to which promotions influence purchasing behaviour, and whether the restrictions may support healthier default choices for families?

28. What impacts, if any, do you think the proposed policy would have on people on the basis of their: age, sex, race, religion, sexual orientation, pregnancy and maternity, disability, gender reassignment and marriage/civil partnership?

29. Are there population groups or communities who may be disproportionately affected, positively or negatively, by the proposals. Please list below

30. Do you have any additional comments or evidence not covered elsewhere in this consultation?

7. Responses and data protection

Responses are required by close 21 October 2026. Please state, in your response, whether you are responding as a private individual or on behalf of an organisation/company (including details of any stakeholders your organisation represents).

Responses can be submitted via the online questionnaire available at <https://consultations2.nidirect.gov.uk/doh-1/consultation-on-restricting-promotions-of-hfss>

Alternatively, please send your response to Executive.Support@food.gov.uk

Or write to:

Food Standards Agency in Northern Ireland

10A-C Clarendon Road

Belfast BT1 3BG

For information on how the FSA handles your personal data, please refer to the Consultation privacy notice at <https://www.food.gov.uk/about-us/privacy-notice-consultations>'.

8. Further information

If you require a more accessible format of this document, please send details to the named contact for responses to this consultation and your request will be considered.

This consultation has been prepared in accordance with [HM Government consultation principles](#).

Thank you on behalf of the Food Standards Agency and Department of Health for participating in this public consultation.

Dietary Health Team/Food Standards Agency, Health Development Policy
Branch/Department of Health

9. References

- [Public Health England \(2015\) 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](#)
- [Department of Health and Social Care \(2020; updated 2025\). Impact assessment: Restricting checkout, end of aisle and store entrance sales of HFSS products.](#)
- [Department of Health. \(2025\). Healthy Futures: Obesity strategic framework for Northern Ireland. Northern Ireland Executive.](#)
- [Cancer Research UK. \(2018, September 24\). Obesity could overtake smoking as biggest preventable cause of cancer in women.](#)
- [Department of Health. \(2025\). Health Survey Northern Ireland: First results 2024/25. Northern Ireland Executive.](#)
- [Department of Health. \(2026\). Health Inequalities Annual Report 2026. Northern Ireland Executive.](#)
- [Simmonds, M., Llewellyn, A., Owen, C. G., & Woolacott, N. \(2016\). Predicting adult obesity from childhood obesity: A systematic review and meta-analysis. Obesity Reviews, 17\(2\), 95–107. <https://doi.org/10.1111/obr.12334>](#)
- [British Heart Foundation Northern Ireland. \(2023\). The economic impact of smoking, alcohol consumption and obesity in Northern Ireland.](#)
- Worldpanel by Numerator. [2023-2025] purchase and nutrition data from the Northern Ireland Take Home Panel and GB Nutrition Service (This document, including any associated analysis and statements, has been produced independently of Worldpanel by Numerator.)
- [Food Standards Agency. \(2025\). National Diet and Nutrition Survey: 2017 to 2023 report for Northern Ireland. UK Government.](#)
- [Department of Health and Social Care. \(2025\). Final impact assessment: Restricting promotions of products high in fat, sugar or salt by location and by volume price. UK Government.](#)
- [Institute of Grocery Distribution, & University of Leeds. \(2025\). Evaluation of the HFSS placement legislation: Impact on sales and consumer behaviour. IGD.](#)
- [Davis, G., Sharpe, F., McFarland, K., McGonagle, J., & Close, F. \(2026\). Mapping the food retail and out of home sector in Northern Ireland. Food Standards Agency Research and Evidence. <https://doi.org/10.46756/001c.144758>](#)

[Welsh Government. \(2025\). Proposals to make the food environment healthier: Summary of responses to the consultation on the Food \(Promotion and Placement\) \(Wales\) Regulations. Welsh Government.](#)

[Food Standards Agency. \(2024\). Food and You 2: Northern Ireland Wave 7–8 key findings. Food Standards Agency.](#)

[Food Standards Agency, & YouGov. \(2025\). Consumer Insights Tracker \(July–September 2025\). Food Standards Agency Research and Evidence.](#)
<https://doi.org/10.46756/001c.145735>

[Public Health England. \(2015\). 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. UK Government.](#)