



# Ensuring Compliance with HFSS Regulations Across the UK

# Welcome



**Amy Glass**

Head of UK Diet and Health Policy  
**Food and Drink Federation**

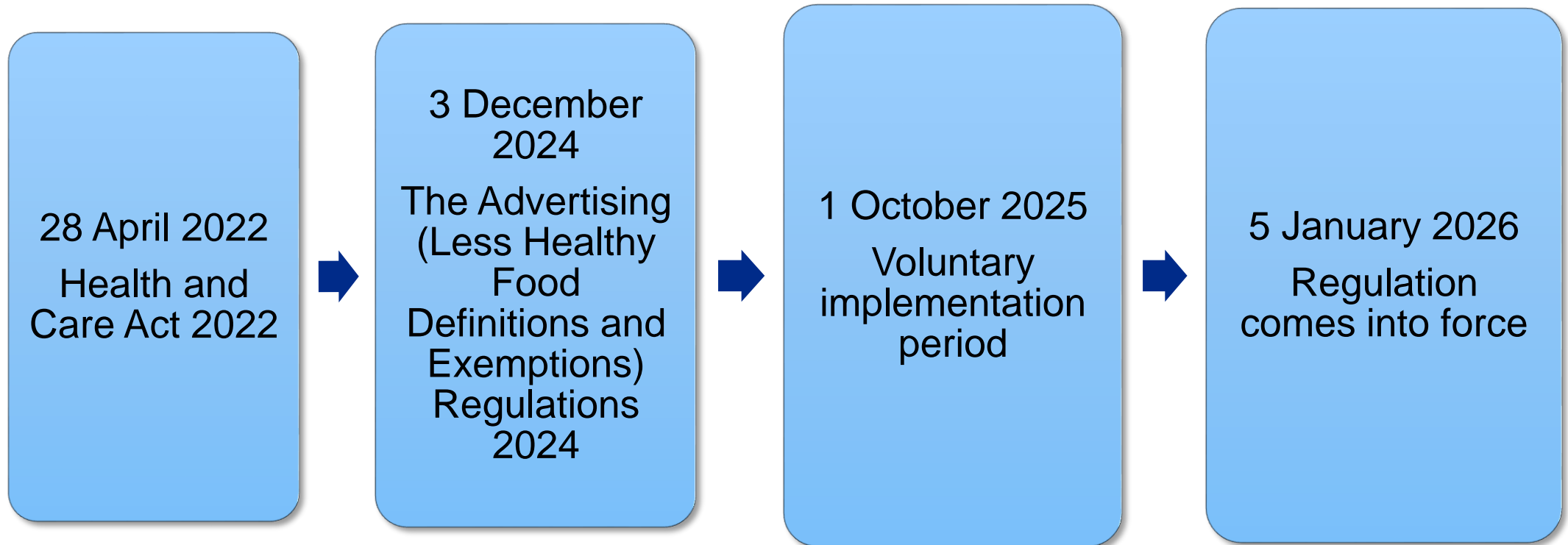
# Introduction to LHF Advertising Regulation



**Louise Allen**

Senior Executive of Diet and Health  
Food and Drink Federation

# Less Healthy Advertising Regulations UK



# Less Healthy Advertising Regulations UK



## The Advertising (Less Healthy Food Definitions and Exemptions) Regulations 2024 - Law will apply from 5 January 2026

### Media in scope:

- Advertising for TV services between 5.30am and 9pm
- Advertising for on demand programme services (ODPS) between 5.30am and 9pm
- All paid for online advertisements (at any time)
- No additional restrictions on print, outdoor, cinema, radio or direct marketing



# Less Healthy Advertising Regulations UK



## **Businesses in scope:**

- Large businesses (>250 employees)
- Anyone placing an advertisement (manufacturers, retailers, out of home sector, charity)
- To note - All businesses, including SMEs are subject to existing rules on high fat salt and sugar (HFSS) advertising in children's media.

## **Exemptions**

- Business to business advertising
- Advertising not intended to be accessed by UK consumers
- Online audio services
- Owned online media - company websites and social media accounts – BUT some caution is needed.

# Less Healthy Advertising Regulations UK



## Online media in scope:

- Paid-for online display advertising (banner ads on news websites and apps, swipe to buy)
- Paid-for online video advertising (video ads served on video sharing sites)
- Paid-for online social media advertising (including in-feed)
- Paid-for search listings (sponsored links on search engines)
- Paid-for listings on price comparison or aggregator services
- Paid-for influencer marketing (influencer posts paid for/sponsored by an advertiser)
- Paid-for in-game advertising or advergames
- Paid-for newsletter advertising (banner ads in a cookery newsletter)
- Paid-for advertisements distributed through web widgets
- Paid-for advertorials.
- Paid-for product specific sponsorship



# What is a 'Less Healthy' Food or Drink

Product falls with the in-scope categories?



Product meets the definition of 'HFSS' using the UK nutrient profiling model guidance 2011?



Less Healthy

Restrictions apply to HFSS products in the following categories:

- 1.Prepared soft drinks with added sugars
- 2.Savoury snacks
- 3.Breakfast cereals and porridges
- 4.Chocolates and sweets
- 5.Ice cream and similar frozen products
- 6.Cakes and cupcakes
- 7.Sweet biscuits and bars
- 8.Morning goods (e.g., sweet pastries)
- 9.Desserts and puddings
- 10.Sweetened yoghurt and fromage frais
- 11.Pizzas
- 12.Prepared potato products
- 13.Main meals and sandwiches



# Nutrient Profiling Model



Points	Energy (kJ)	Sat Fat (g)	Total Sugar (g)	Sodium (mg)
0	≤ 335	≤ 1	≤ 4.5	≤ 90
1	>335	>1	>4.5	>90
2	>670	>2	>9	>180
3	>1005	>3	>13.5	>270
4	>1340	>4	>18	>360
5	>1675	>5	>22.5	>450
6	>2010	>6	>27	>540
7	>2345	>7	>31	>630
8	>2680	>8	>36	>720
9	>3015	>9	>40	>810
10	>3350	>10	>45	>900

Points	Fruit, Veg & Nuts (%)	NSP Fibre ' (g)	Or AOAC Fibre ' (g)	Protein (g)
0	≤ 40	≤ 0.7	≤ 0.9	≤ 1.6
1	>40	>0.7	>0.9	>1.6
2	>60	>1.4	>1.9	>3.2
3	-	>2.1	>2.8	>4.8
4	-	>2.8	>3.7	>6.4
5*	>80	>3.5	>4.7	>8.0

Use the table to work out the score for each nutrient per 100g of product

**Total 'A' points**  
**(energy + sat fat + sugars + sodium)**  
**MINUS**  
**Total 'C' points**  
**(Fruit, veg and nuts + fibre + protein)**

- If a food scores 4 or more = HFSS
- If a drink scores 1 or more = HFSS

## Protein Cap

If a product scores 11 or more 'A' points you cannot take away the protein score (unless you score 5 points for F/V/N)

# Sold vs Consumed

## Use nutrient information as sold

- Almost all NPM scores should be based on nutrition information as sold (even frozen products)
- EXCEPT products that need reconstituting before consumption - e.g. custard powder, cake mixes, drinks powders.
- Nutrient information for reconstituted products should be based on manufacturers reconstitution instructions.



# What is a 'Less Healthy' Food or Drink

UK Government Guidance on  
the Regulation 2024



Nutrient Profiling Model  
Guidance 2011



BRC Guidance on  
Categories



# Is Brand Advertising in Scope?

## Consultation outcome June 2021

We want to give brands the opportunity to reformulate their products. A brand that is currently synonymous with HFSS products may not be in the future. It is only fair to allow the sector the option to move away from producing products that are HFSS. Including brand advertising in scope could restrict this opportunity. The evidence on the impact of advertising to children is also centred on product-specific adverts.

It should be noted that a brand is only able to advertise/sponsor if the advert does not include an identifiable less healthy food and drink product.

## **Health and Care Act 2022 – Schedule 18**

‘a product is “identifiable”, in relation to advertisements, if persons in the United Kingdom (or any part of the United Kingdom) could reasonably be expected to be able to identify the advertisements as being for that product’

## Childhood Obesity

Statement made on 22 May 2025

Statement UIN HCWS652

### Statement made by



**Ashley Dalton**

Parliamentary Under-Secretary of State for Public Health and Prevention

Labour

West Lancashire



‘Businesses will still have opportunities to promote their brands, provided that their adverts do not identify a specific less healthy product’

‘The Government intends to make and lay a Statutory Instrument (SI) to explicitly exempt ‘brand advertising’ from the restrictions. The SI will provide legal clarification on this aspect of the existing policy, as it was understood and agreed by Parliament during the passage of the Health and Care Bill’

‘This will enable the regulators to deliver clear implementation guidance and mean that industry can prepare advertising campaigns with confidence’

FDF HFSS  
Toolkit



Includes:

- Links to relevant legislation and government guidance
- Nutrient profiling model calculator and technical guidance
- Research relating to HFSS promotional restrictions in England
- Links to presentation and recording from today's webinar.

[louise.allen@fdf.org.uk](mailto:louise.allen@fdf.org.uk)

# Next steps on LHF Advertising



**Chris Walker**

Head of Policy and Government Affairs  
Advertising Association



# Less Healthy Foods

The Voluntary Agreement  
and New Restrictions





**MONTHS**

0

3

**DAYS**

0

7

# Current state of play



**May 2025**

Government  
decides to  
legislate to  
clarify the  
law

**1<sup>st</sup> October 2025**

# Current state of play



# VOLUNTARY AGREEMENT

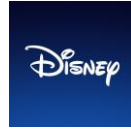


# Trust is crucial

ADVERTISING  
ASSOCIATION

COBA  
THE ASSOCIATION FOR COMMERCIAL  
BROADCASTERS AND ON-DEMAND SERVICES

aop



Guardian Media Group  
gmg

ISBA

IPA  
Incorporated  
by Royal Charter

iab.  
UK

itv

newsmedia  
association



Reach

sky



THE  
Sun

techUK

THE TIMES  
THE SUNDAY TIMES



Department  
for Culture,  
Media & Sport



Department  
of Health &  
Social Care



Prime Minister's Office  
10 Downing Street

ADVERTISING  
ASSOCIATION

CONFIDENTIAL | NOT LEGAL ADVICE

# ADVERTS IN Q4

# Caveats

- Cannot give 100% certainty
- Advice is based on what has been largely consistent between the first and second sets of draft guidance
- We need you! Our ask is that you seek to comply with the letter and spirit of the agreement



# Suggested approach – DON'T:

- **NAME** an LHF product – in text or audio
- **SHOW** an LHF product
  - In its packaging and recognisable
  - Out of packaging, but recognisable
  - In an animated or artistic style
  - In an ad alongside a non-LHF variant
  - In promotional/2-for-1, customer experience or loyalty scheme ads
  - In the background of an ad, but identifiable in real time
- Include branding inextricably linked to an LHF product variant
- Use a combination of factors that may identify an LHF product

# Suggested approach – YOU COULD:

- **Advertise non-LHF** products/product variants
- Refer to a **range** which includes LHF and non-LHF variants – without showing any product
- Use **generic packaging** which doesn't identify a product
- **Imply** the presence of a product without showing it
- Depict **ingredients**
- Run **sourcing, sustainability or CSR** focused ads

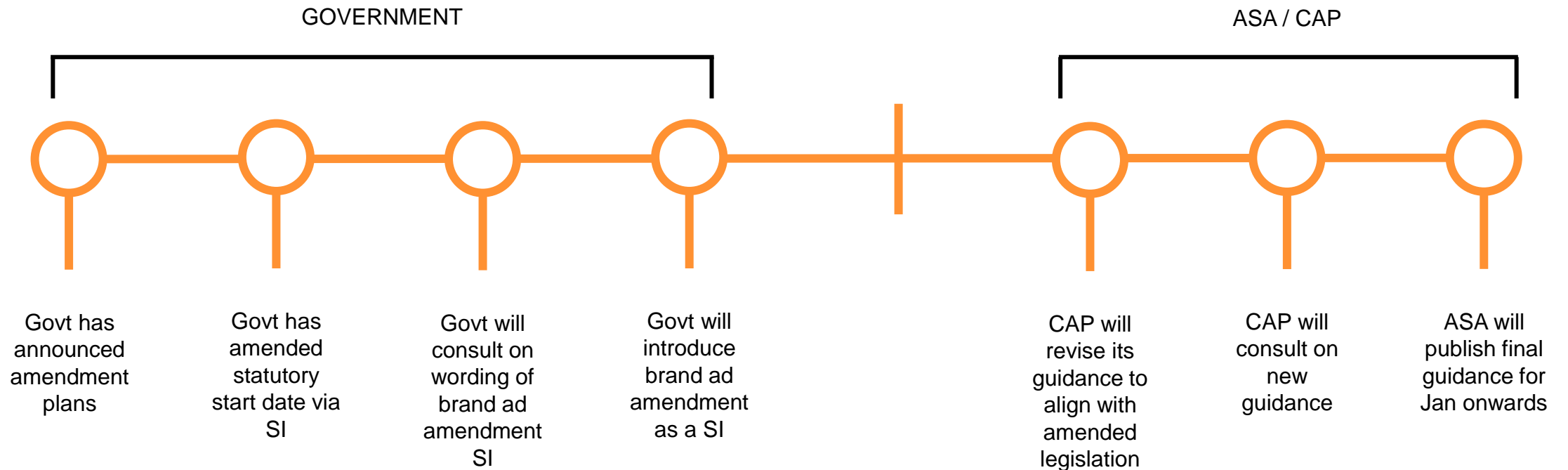
# Consider carefully:

- Depiction or description of generic products
  - Table scenes
- 

**Seek to comply with the spirit of the restrictions**  
**Make best endeavours to live up to our voluntary agreement**  
**Adopt a wide understanding of what might constitute a product ad**

# NEXT STEPS

# Next steps



# Q&A

Tag us with **#FDfEvents**



@fdfevents



@Foodanddrinkfed



@The Food and Drink Federation



[www.fdf.org.uk](http://www.fdf.org.uk)

# HFSS – A Consumer Perspective



**Susan Liu**

Consumer Insight Director, Public Nutrition Team  
Kantar Worldpanel





# KANTAR

## HFSS in GB - How have consumers responded so far?

A quick look at progress

Kantar Worldpanel: Public & Nutrition Service  
June 2025



# Kantar Worldpanel

## 30,000 household purchase panel

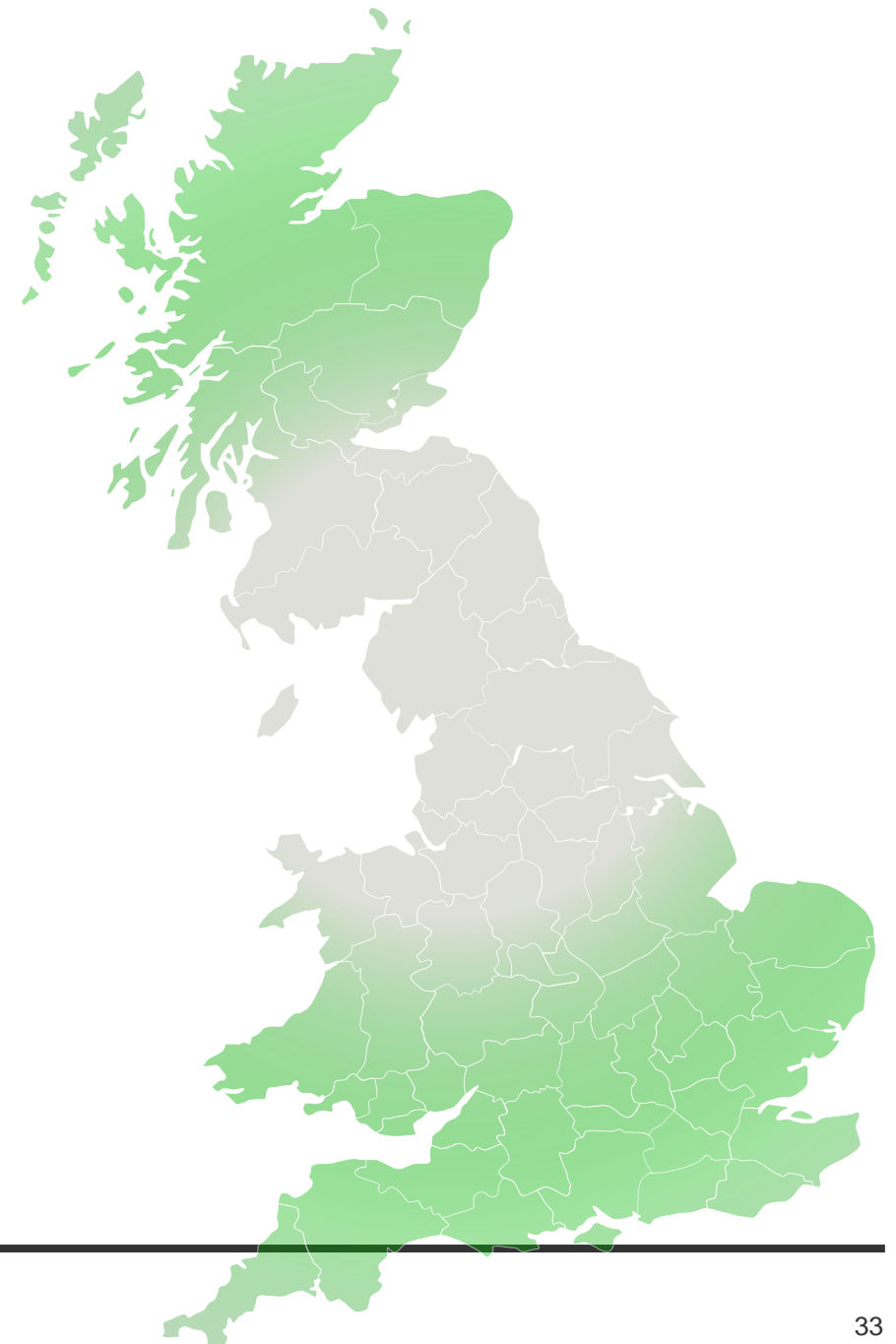
Take home grocery purchasing

Weighted to represent total GB

Continuous, syndicated data

Nutrition information for every  
food & drink product

Syndicated surveys completed by our panellists



# Kantar's nutritional service

Kantar collects nutritional information from packs and overlays purchase behaviour to understand **nutrient purchase trends**.

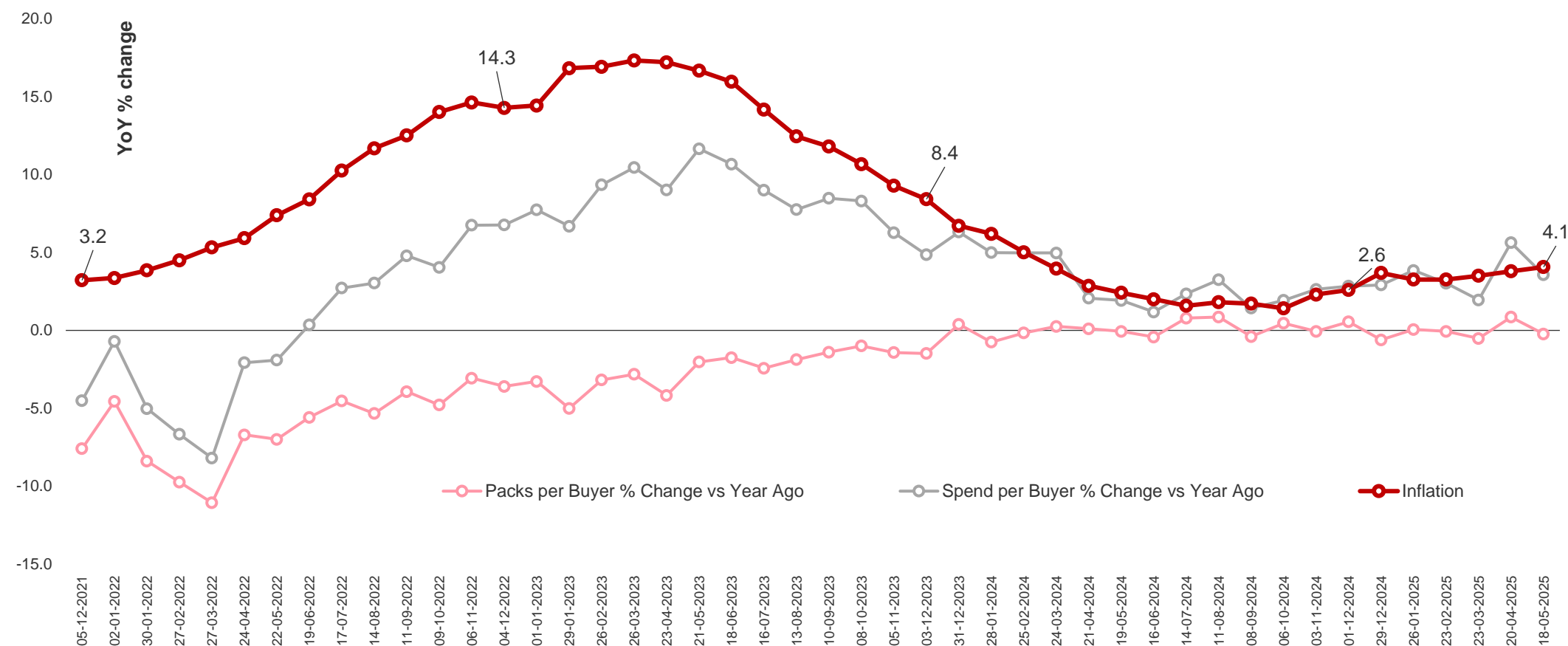
This, together with an estimate of fruit veg and nut content, allows us to estimate the **Nutrient Profile Model\*** scores for every take home food and drink product.

Our category classifications have been used to best match the legislation categories.

We use our read of NPM to estimate whether each product is impacted by HFSS or not.

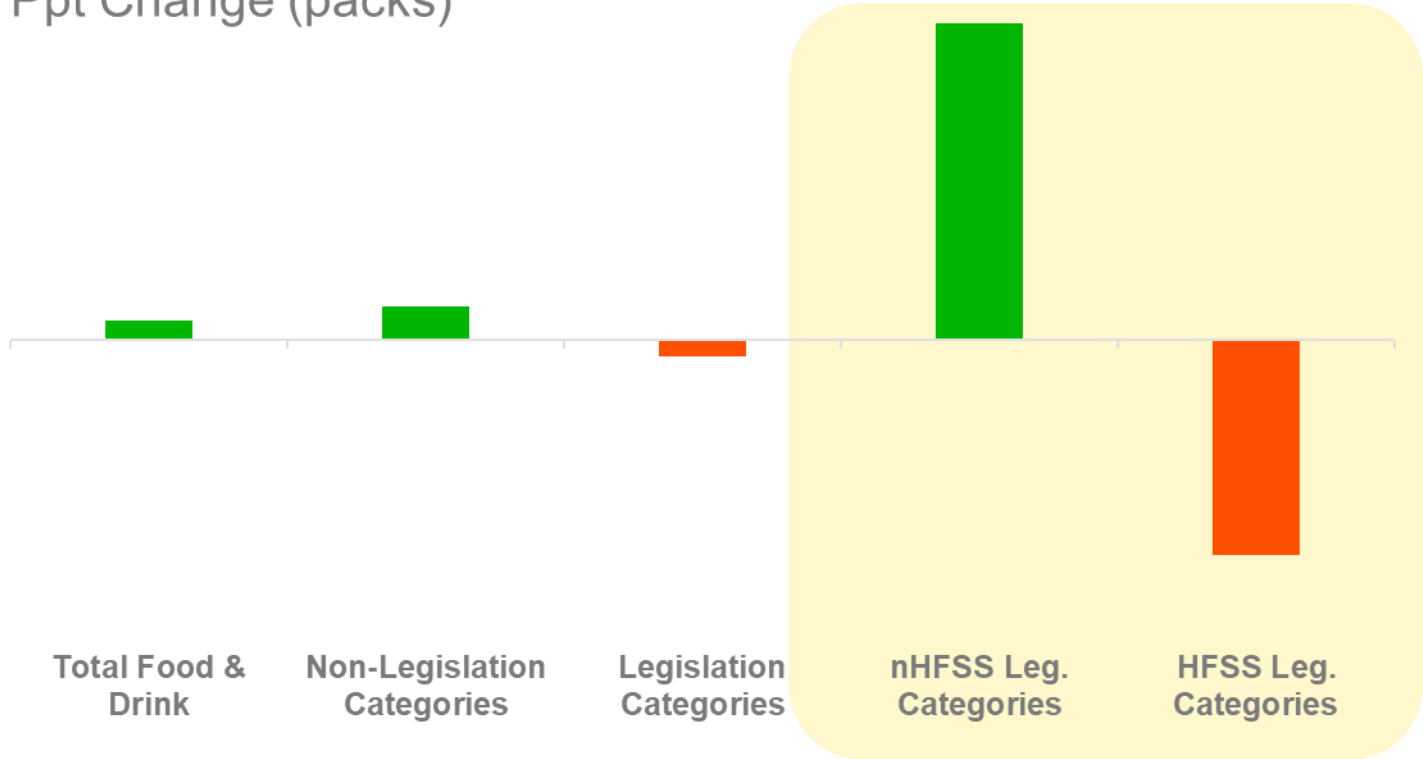


# Inflation has come down since the heights of 2023, but in the latest months has been creeping up again and volume is clinging onto growth



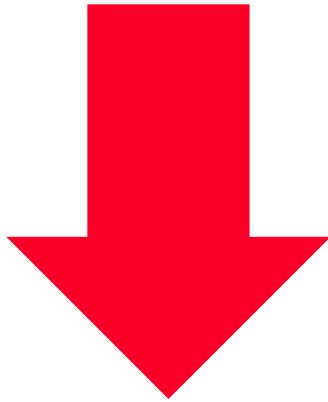
# Overall, non HFSS products have grown ahead of HFSS within legislation categories, but not enough to balance overall decline

52 w/e 29 Dec 2024 vs 52 w/e 1 Jan 2023  
Ppt Change (packs)

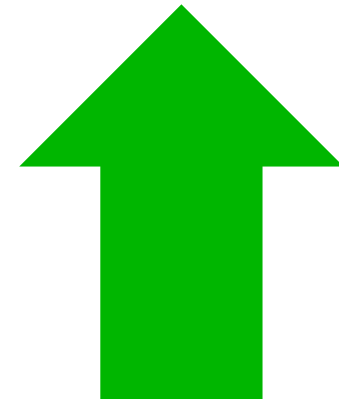


At the Total Market level, the balance is shifting towards non HFSS across all demographics groups

HFSS



Non HFSS





# The groups that continue to have the greatest leaning towards HFSS products..

% HFSS packs within Legislation categories in GB

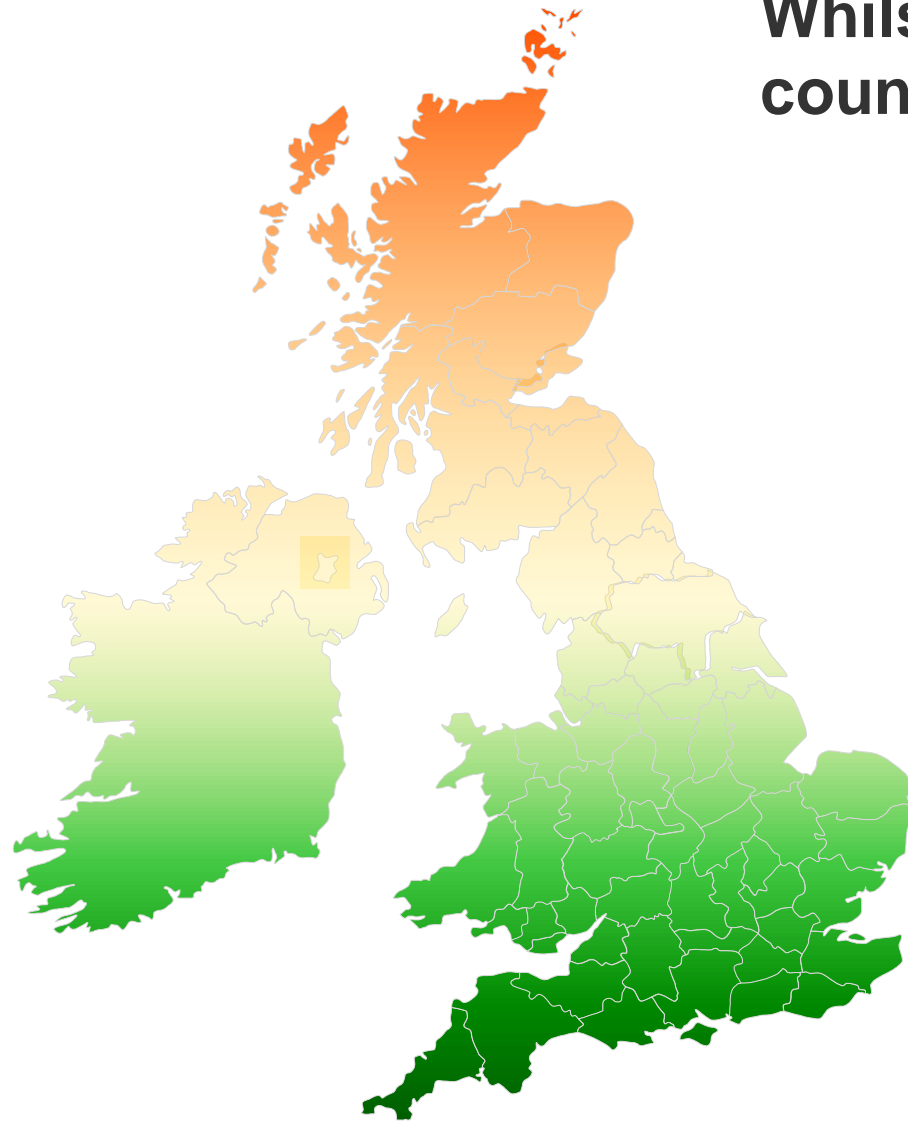


**Retired**  
(demographic group who  
saw the least change)



**Households *without***  
**children**

**Whilst progress has been felt up and down the country, the level naturally varies by region**



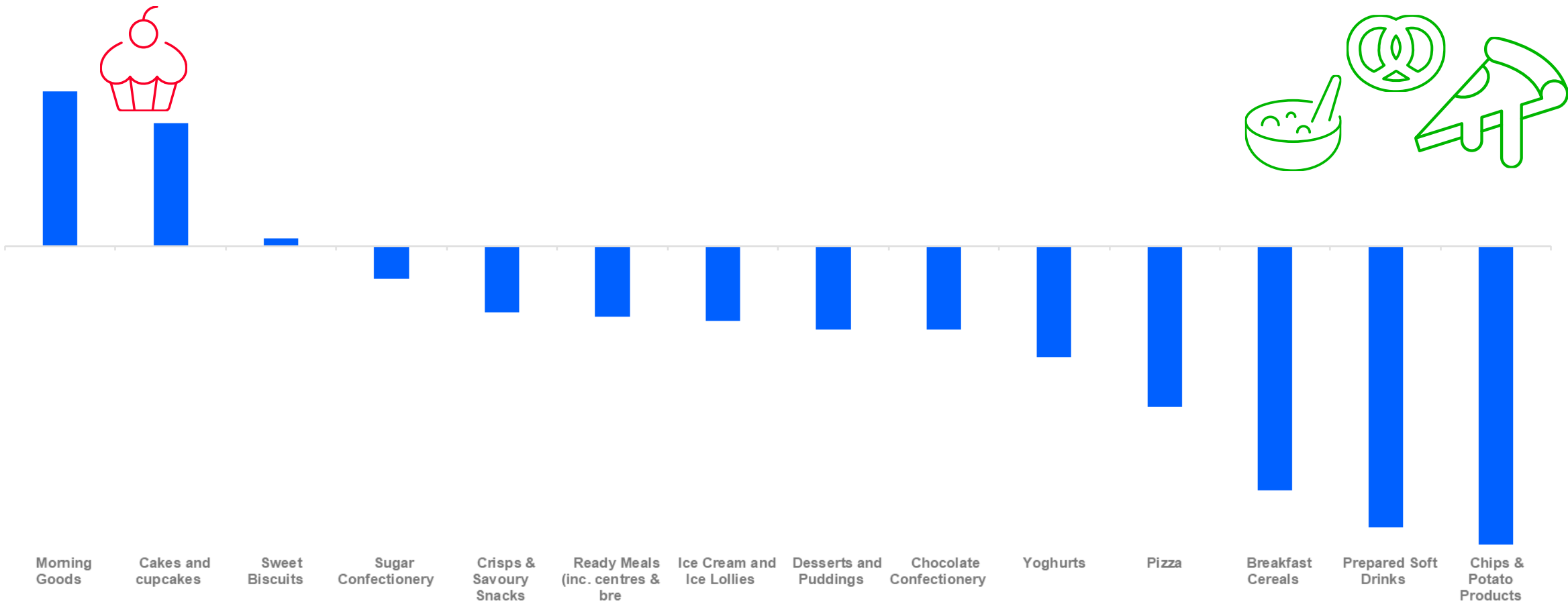
Highest reliance on HFSS products in Legislation categories



Lowest reliance on HFSS products in Legislation categories

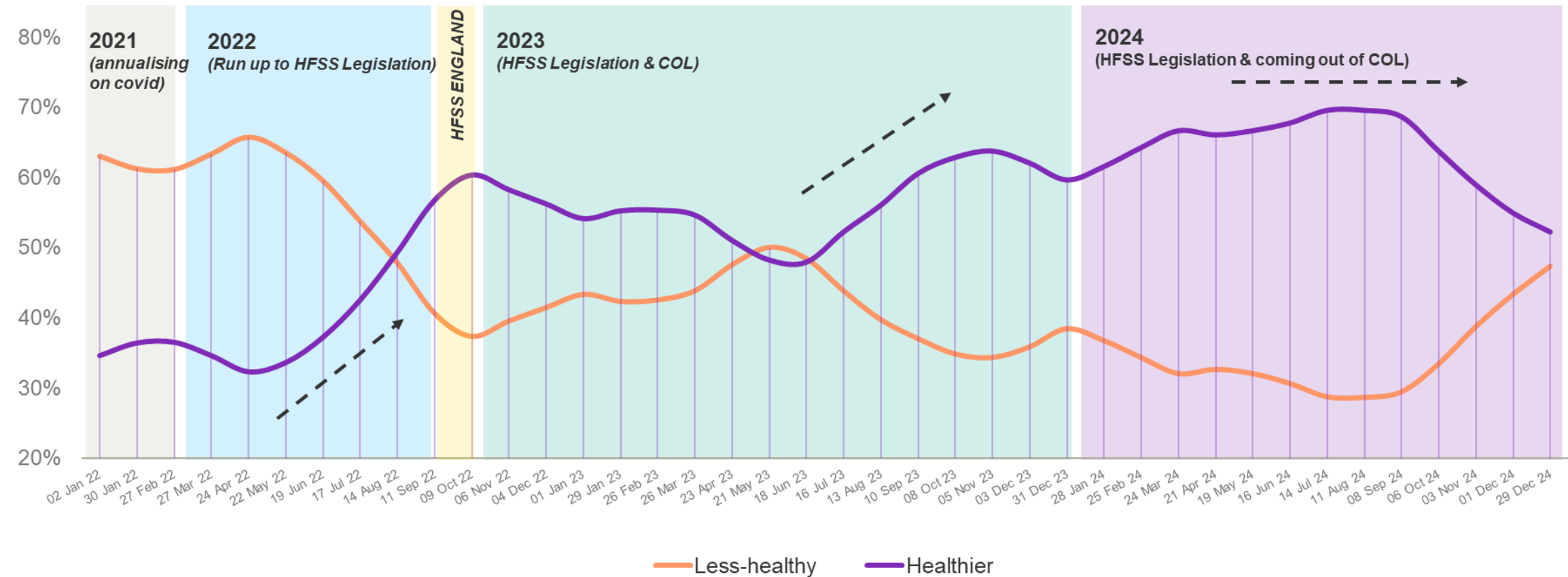
# And the level of change varies across the legislation categories

Ppt change in HFSS as a percentage of packs sold - GB





# Industry has responded to HFSS legislation in England, and it has prompted a sharp increase in healthier innovation. But external factors have also plagued shoppers!





# We are reformulating to make **categories healthier**

Average NPM Scores - Total HFSS Categories

**4.93** → **4.82**  
52 w/e 1 Jan 2023      52 w/e 29 Dec 2024



## But baskets are getting **unhealthier**

Average NPM Scores - Total food drink

**1.11** → **1.12**  
52 w/e 1 Jan 2023      52 w/e 29 Dec 2024

# ...and consumers want more innovation!

But this must be meaningful and fit our lifestyle needs



## 46%

believe retailers & manufacturers should be **increasing healthy NPD** to help us stay healthy

(vs 33% globally)



Something **without the effort**

**1bn fewer** scratch cooked meals vs 10 years ago.



# ...and more innovation!

But this must be meaningful and fit our lifestyle needs



## 46%

believe retailers & manufacturers should be **increasing healthy NPD to help us stay healthy**

*(vs 33% globally)*



### Added goodness

**69%** see **multi-vitamins** as beneficial for our wellbeing.



**They are high in Protein & Vitamins**

Over 9 Vitamins to help reduce tiredness and boost your metabolism.

Packed with over 9 Vitamins

C	B2	B6
E	B3	B9
B1	B5	B12

## So what are the takeouts?



01

Legislation in England has had a positive impact in boosting healthier sales all demographics

02

Healthier progress across GB varies more by region at the overall level, than other demographic splits

03

We have seen a huge increase in healthier innovation coinciding with England's legislation which has contributed to progress

04

For healthier progress to continue, we need to innovate in a way that streamlines the shopper's everyday and offers more goodness





# Thank you

If you have any queries, please reach out to:



**Susie Liu**

Susan.Liu@kantar.com  
Kantar Public & Nutrition

# Healthier Product Innovation: Industry Progress



**Kate Harrington**

Senior Executive of Diet and Health  
Food and Drink Federation

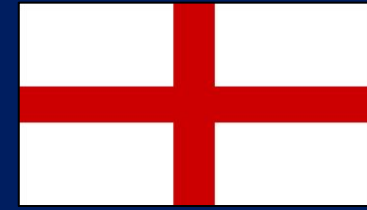
# What I'll cover



- HFSS promotions in England and HFSS volume restrictions
- Industry progress to date
  - Kantar data showing salt, sugar and calorie reduction in FDF member products
  - Spotlight on Action on Fibre
  - Case studies
  - Spotlight on FDF Scotland's Reformulation for Health programme
- Driving further progress
- Key resources



# HFSS promotions in England



fdf

## The Food (Promotion and Placement) (England) Regulations 2021

- Retail businesses with over 50 employees
- Placement restrictions came into force October 2022

### Location in scope

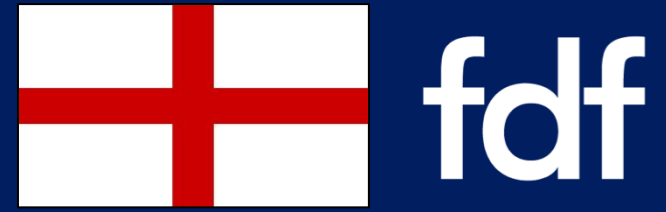
- Within a defined distance of store entrance or covered external area
- Within 2m of checkout facility / queuing area
- End of aisles
- Equivalent restricted online locations (home page, checkout page, pop ups, non-HFSS product searches)
- Exemptions: Small stores and specialist retailers.

### Products in scope

#### Prepacked HFSS products that fall under the following categories:

1. Soft drinks with added sugar
2. Savoury snacks
3. Breakfast cereals
4. Confectionery, including chocolate and sweets
5. Ice cream, ice lollies, frozen yoghurt, water ices
6. Cakes and cupcakes
7. Sweet biscuits and bars
8. Morning goods
9. Desserts and puddings
10. Sweetened yoghurt / fromage frais
11. Pizzas
12. Chips and potato products
13. Ready meals, meal centres, breaded and battered products

# HFSS volume promotions



## Volume promotions on HFSS products in force from 1 October 2025

### Mechanisms in scope

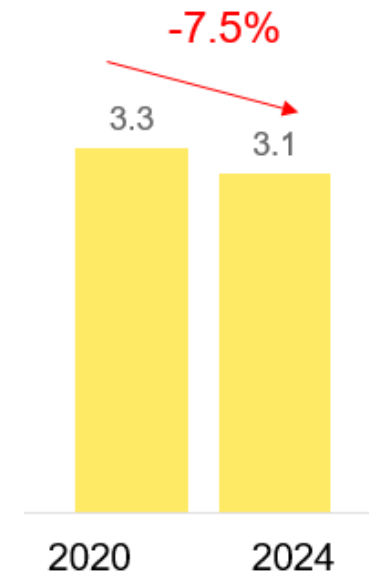
- Multibuy (eg BOGOF, buy 6 save 25%),
- Volume promotions with loyalty points or discounts (eg buy 3 get 1000 loyalty points)
- On pack volume promotions (50% extra free) (by October 2026)
- Unlimited refills of sugar sweetened HFSS drinks in out of home sector
- Not in Scope: Meal deals, multipacks, temporary price reductions, samples, vouchers



# 2024 progress

1. Food and Drink Federation member products have 31% less salt, 30% less sugar and 24% fewer calories compared to 2015.
2. Our members' products have become healthier on average.
  - The average NPM score is now 3.1 for FDF members, representing a 7.5% reduction since 2020.
  - Under the Government's HFSS legislation, a lower NPM score indicates a healthier product. Foods in regulated categories with a score of 4 or above, and drinks scoring 1 or more, are classified as less healthy and face restrictions.

*FDF Member products now have:*



1. Kantar Worldpanel GB Take Home Purchase data for FDF members, 2024 vs 2015 total nutrient volume contribution (percentage difference).  
2. Kantar's Worldpanel GB Take Home Purchase data for FDF members, average weighted Nutrient Profile Model Score 2020, 2024

# Spotlight on Action on Fibre

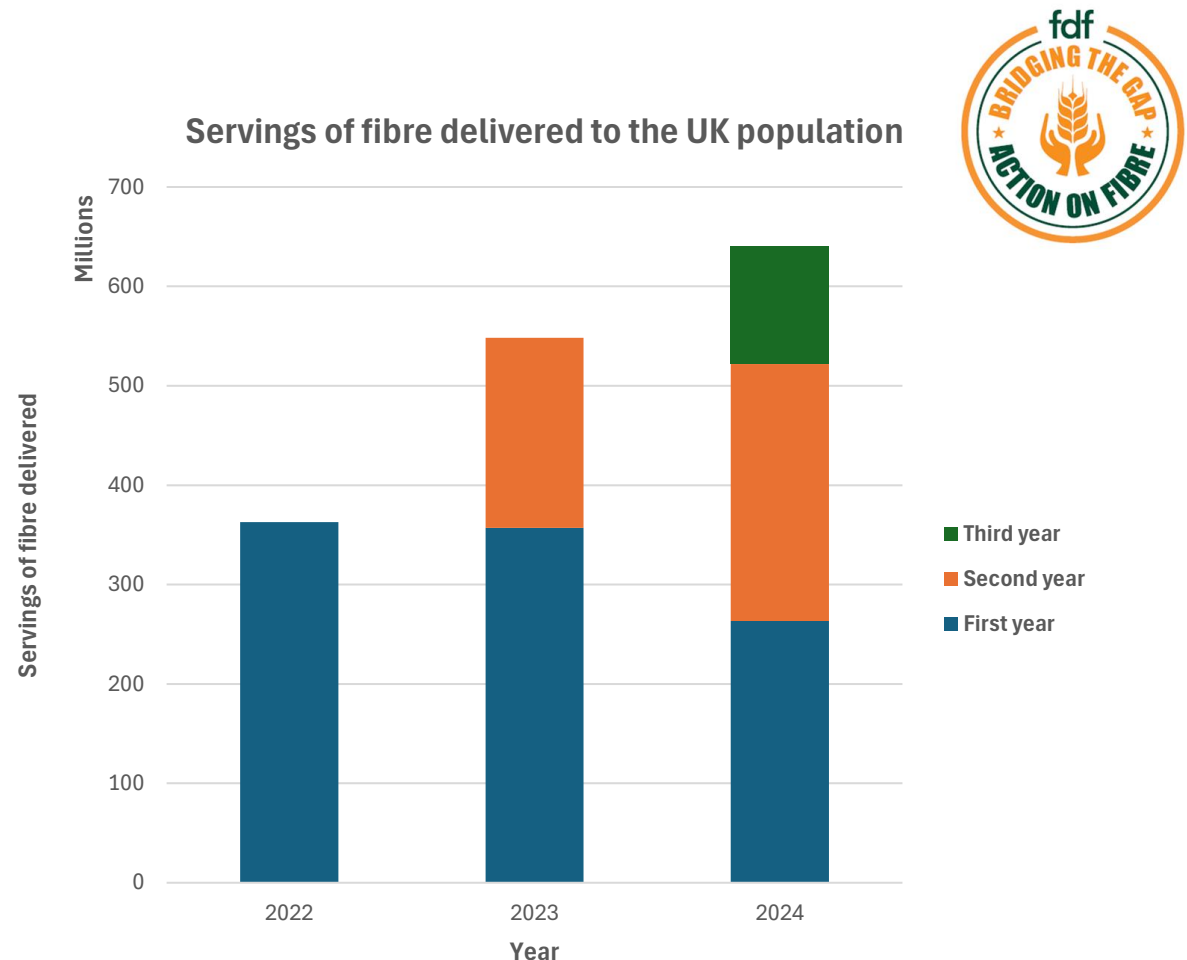


## In 2024...

- 24 brands participated to help bridge the fibre gap
- Over **90** new and reformulated products were brought to market
- This delivered **118 million** servings of fibre to the population

## Since 2022...

- Almost **400** new and reformulated products launched
- This delivered **1.5 billion** servings of fibre to the UK population



# Case studies



- In October 2024, **PepsiCo UK** transformed its entire Doritos portfolio, now classified **non-HFSS**.
- **Reduction of salt and fat by an average of 18% and 14%.**
- **Changes** included adding more corn, fine-tuning the cooking process and altering the seasoning.



- As of September 2024, **BelVita's** entire Soft Bakes range is now **non-HFSS**.
- For the Choco Hazelnut Soft Bake, reduction of **sodium by 56% and saturated fat by 5%.**
- For the Choc Chip Soft Bake, reduction of **sodium by 24%, sugars by 10% and saturated fat by 9%.**



- **Mars Food & Nutrition UK** expanded its range to **27 ambient ready meals**, under Ben's Original and Dolmio.
- The **innovations** include grain bowls, classic rice meals, plant-powered options, globally inspired street food and premium pasta dishes.
- All of the products are **non-HFSS**.



- **Kellanova** launched Special K High Fibre Crunchy Golden Clusters in the UK.
- This has a **fibre content of 13g/100g**, reduced sugar, salt and saturated fat, and is also now **non-HFSS**.
- The launch contributed **13.4 million fibre servings** in 2024.

# Spotlight on FDF Scotland



## Reformulation for Health programme:

- ✓ **Over £374,000 in funding pots** to support SME manufacturers in Scotland
- ✓ Supported hundreds of food businesses and stakeholders through **upskilling training events**
- ✓ Involved the **whole system, from ingredient suppliers to academia**, to promote collaboration for successful reformulation of Scottish products
- ✓ The **Reformul8 Partnership** brings together stakeholders who can facilitate reformulation and has grown to a network of **80 partners**
- ✓ Freely available **Reformulation Toolkit** provides a wealth of resources to support industry with reformulation





# Driving further progress



*The need for a stable regulatory environment and goalposts (such as HFSS) to give companies the confidence to invest further in innovation*

**Government can support food and drink manufacturers to accelerate this work by:**



Establishing a reformulation programme to support SMEs based on the Reformulation for Health Programme in Scotland



Supporting reformulation investment by expanding access to existing R&D tax credits, grants and capital allowance schemes



Launching a new public health campaign with positive, practical messaging to support consumer behaviour change



Developing mandatory health metrics in collaboration with industry and others to support transparent data reporting

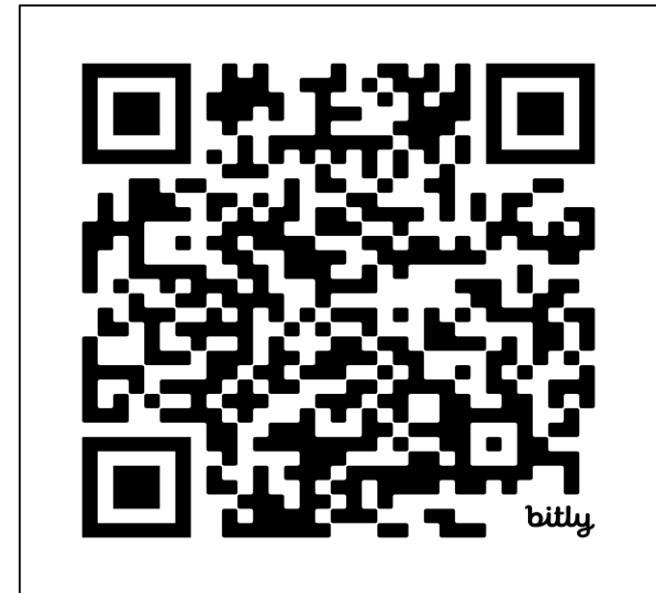
## HFSS toolkit



## FDF Scotland Reformulation toolkit



## Shaping a healthier future progress report





# HFSS Policy in Wales

**Jasmine Tompkins**

Head of Wider Determinants of Health  
Welsh Government



Llywodraeth Cymru  
Welsh Government

# The Food (Promotion and Presentation) (Wales) Regulations 2025

The Cabinet Secretary for Health and Social Care made The Food (Promotion and Presentation) (Wales) 2025 in March this year

The regulations will come into force on 26 March 2026

The Regulations are largely aligned to UK Government's equivalent regulations

# Differences between the regulations in Wales and England



On-pack promotions



Aisle end restrictions

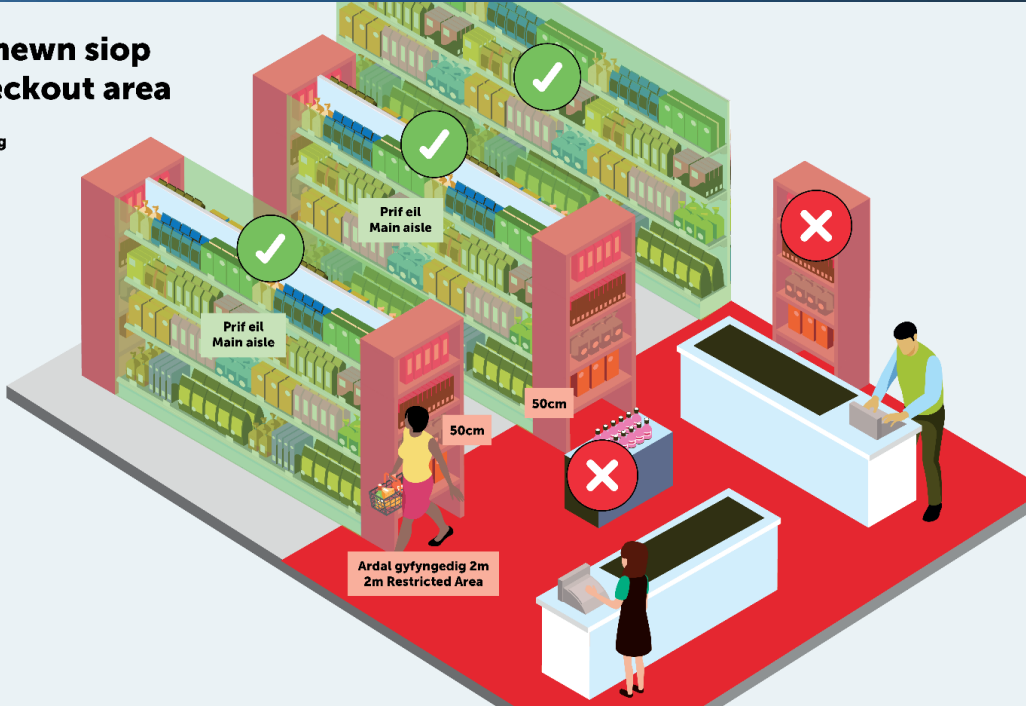


Minor legal drafting differences

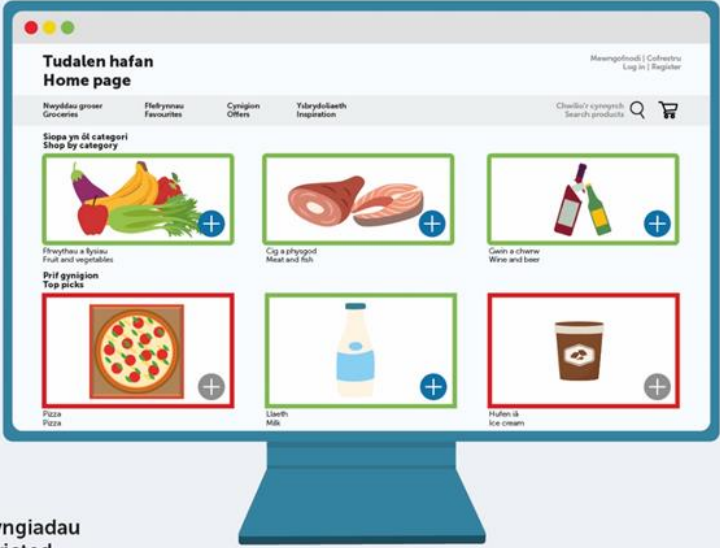
# Supporting guidance

## Ardal dalu mewn siop In-store checkout area

- Ardal waharddedig  
Prohibited area
- Dim cyfyngiadau  
Non-restricted



## Tudalen hafan ar-lein An online home page



- Gwaharddedig  
Prohibited
- Dim cyfyngiadau  
Not restricted

# Next Steps

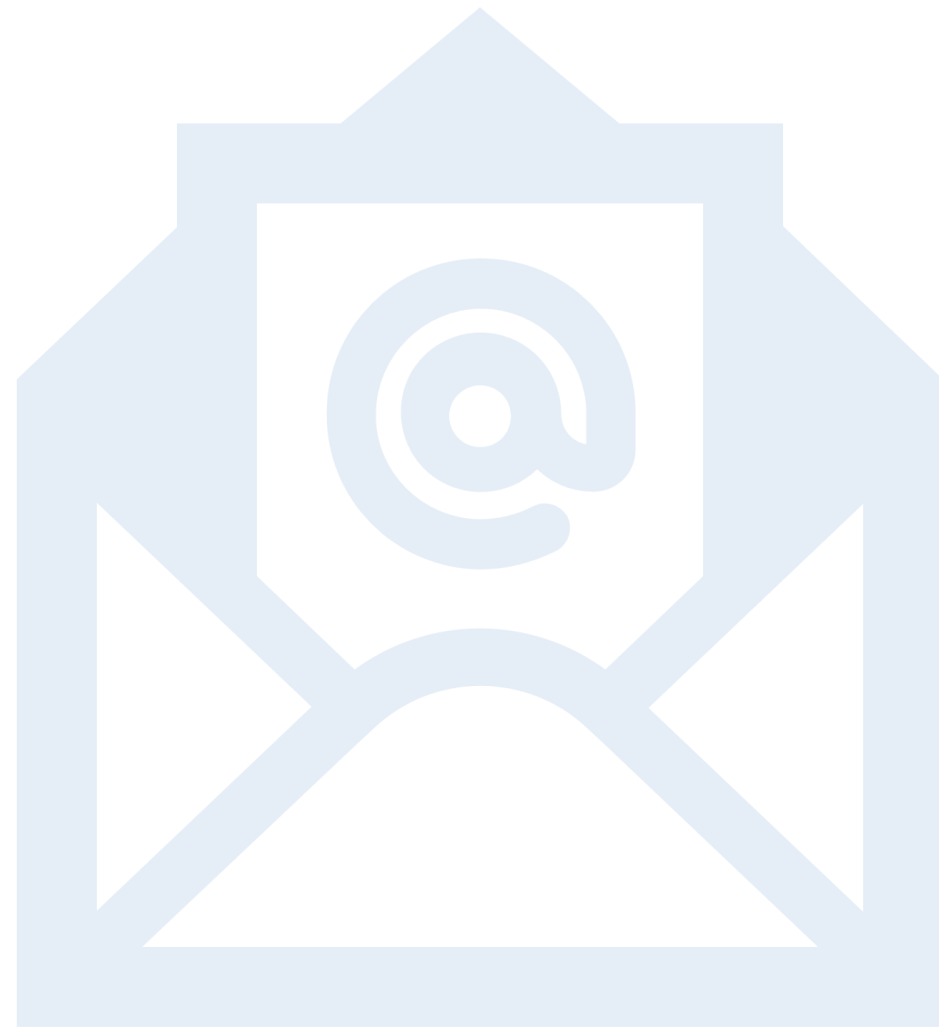
Publication of guidance

Continued engagement with businesses and enforcement bodies

Evaluation programme



Jasmine.Tompkins@gov.wales



# HFSS Policy in Scotland

**Cheryl McNulty**

Restricting Promotions Team Leader, Diet and Healthy Weight  
Scottish Government





# Update - HFSS Promotion Restrictions

Cheryl McNulty  
Diet and Healthy Weight  
Scottish Government





## Background

- The Scottish Government is committed to preventative public health actions to help create a Scotland where everyone eats well and has a healthy weight.
- In 2024 we consulted on the detail of proposed regulation to restrict the promotion of food and drink high in fat sugar or salt.
- On 17<sup>th</sup> June the Scottish Government:
  - published independent analysis of consultation responses
  - published it's response to feedback raised in public consultation
  - updated the Scottish Parliament on its decision to regulate the promotion of food and drink high in fat sugar or salt





## Decision to Regulate HFSS Promotions

Taking account of the feedback received to the consultation, regulations will:

- target food categories that are significant contributors of calories, fat and sugar to the Scottish diet
- restrict promotion of pre-packed food and drink products within targeted food categories that are high in fat, sugar or salt (HFSS)
- restrict price promotions of HFSS products such as multi-buy offers (for example buy one get one free) and free refills of soft drinks with added sugar;
- restricting the placement of HFSS food and drink products at key selling locations such as store entrances, checkouts and aisle ends.

Decisions align with the policy in England and Wales and will apply to businesses with 50 and more employees, both in store and online.





## Timeline / Next Steps

- Regulations will be introduced to the Scottish Parliament this autumn and will be supported by the timely development of clear guidance to help ensure that all parties understand what is expected of them and their responsibilities for ensuring compliance
- A full suite of impact assessments will support regulations
- We intend a period of 12 months between regulations being laid in Parliament and regulations coming into force to enable industry and local authorities to fully prepare





## Contact Details

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If you have any questions, please get in touch via

[DietPolicy@gov.scot](mailto:DietPolicy@gov.scot)

### Relevant links

- [Restricting promotions of food and drink high in fat, sugar or salt – Consultation on the detail of proposed regulations - Scottish Government consultations - Citizen Space](#)
- [Independent analysis of consultation responses](#)
- Scottish Government's [policy response](#)



# Q&A

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# Thank You

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