



Navigating HFSS Regulations Across the UK

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Welcome

Amy Glass

Head of UK Diet and Health Policy

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Programme



10:35	The role of functional ingredients in achieving HFSS compliancy	Emma Davies (Ulrick and Short)
10.50	HFSS experience so far	Louise Allen (Food and Drink Federation)
11:05	HFSS policy in Wales	Ed Wilson (Welsh Government)
11:20	HFSS policy in Scotland	Cheryl McNulty (Scottish Government)
11.35	Further HFSS advertising rules	Chris Walker (Advertising Association)
11.50	Q and A session	All

The Role of Functional Ingredients in Achieving HFSS Compliancy

Emma Davies

Technical Sales (Bakery)

Ulrick & Short

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The role of functional ingredients in achieving HFSS compliancy

FDF WEBINAR
25TH JUNE



How we work

TOGETHER, YOU AND US

01

Design &
develop



02

Clean label
processing



03

Technical
expertise

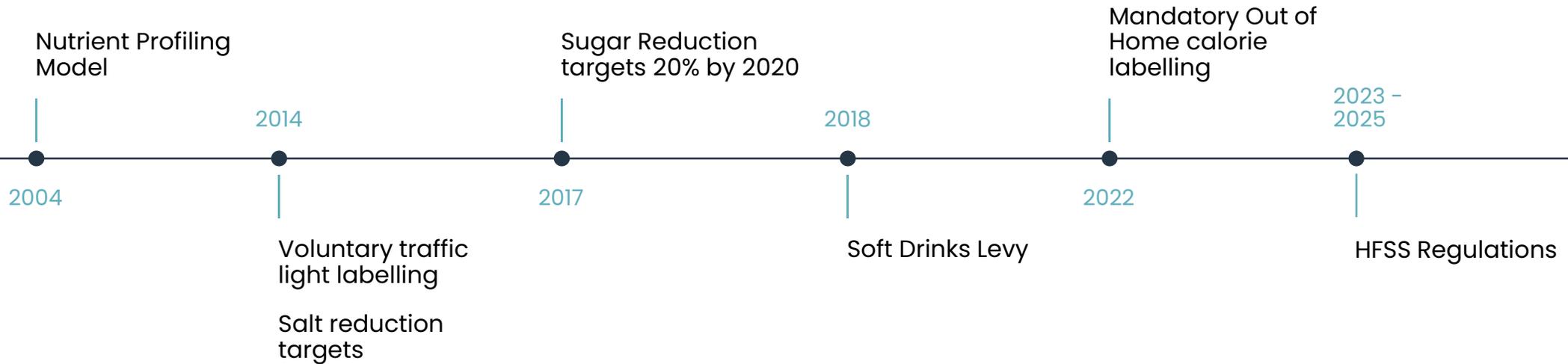


01

Why HFSS?



A decade of health regulations & policies



Leading to a more holistic approach

HFSS REGULATIONS

01

Ban on promotion by location



02

Ban on price promotion for volume sales



03

Ban on TV & online advertisements



02

How to achieve HFSS compliancy

HFSS score

A Points

(Calories + Sugar +
Saturated Fat + Sodium)

–

C Points

(Fruit, Veg & Nuts +
Protein + Fibre)

=

HFSS Score

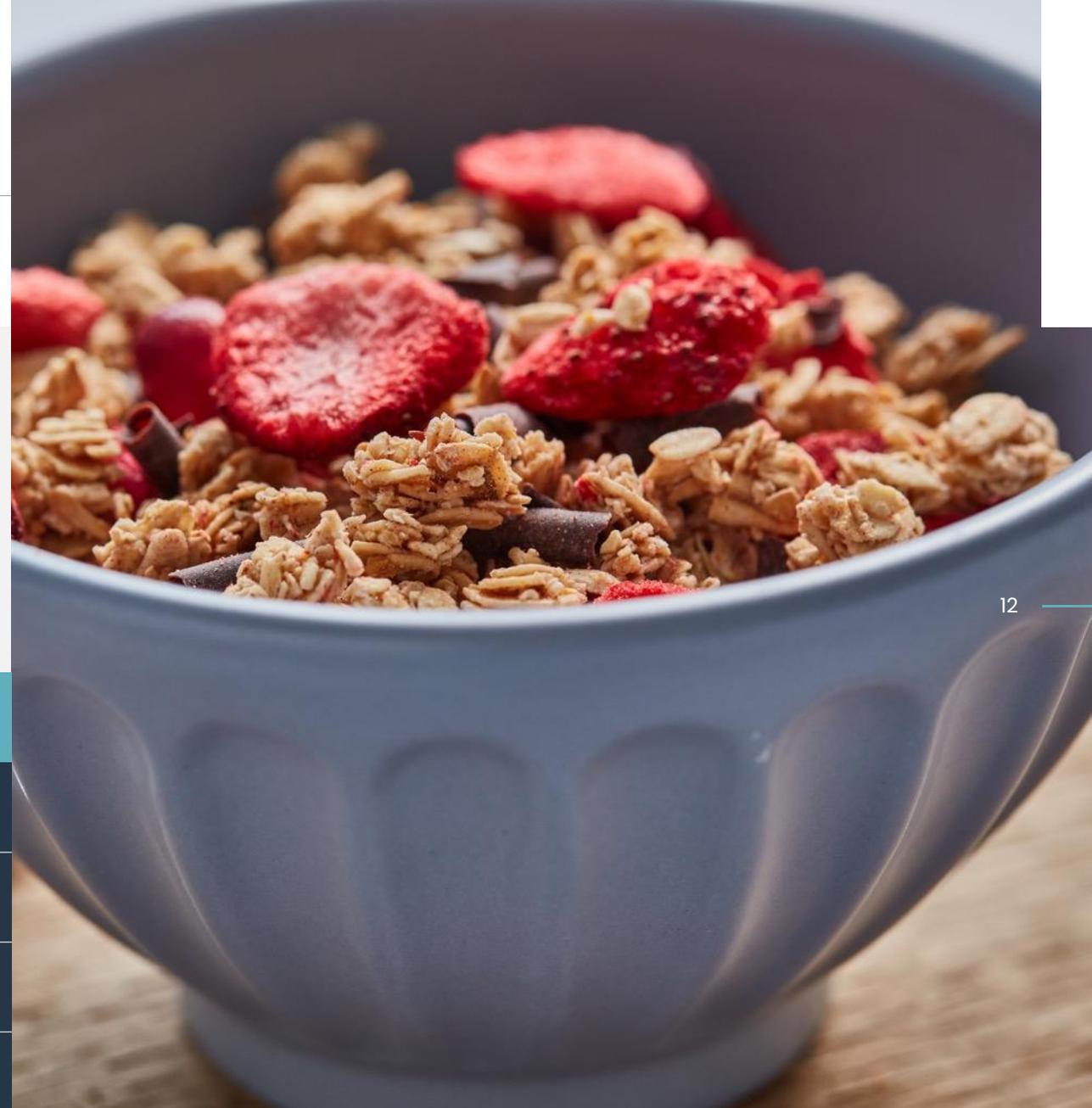
food scoring 4 or more = HFSS
drink scoring 1 or more = HFSS

Sugar Reduction

with avanté™

- Clean label functional sugar replacer
- Mimics the functionality of sugar
- Provides volume, texture & mouthfeel

FEATURES	BENEFITS
Clean Label – additive free	Simplify label declarations
Replaces functionality of sugar	Develop healthier products & improve nutritional labelling
Plant based	Suitable for vegan products
Allergen free options	Suitable for gluten free products
Dry addition powder	Easy application – no process change



Fat Reduction

with delyte™

- Clean label functional fat replacers
- Replace functionality of fat
- Added indulgence & mouthfeel

FEATURES	BENEFITS
Clean Label – additive free	Simplify label declarations
Reduce Fat & Calories	Improve nutritional labelling
Plant Based	Suitable for vegan applications
Neutral Taste	Enhance flavour profiles
Dry addition powder	Easy application, no process change



Protein Fortification

with complex™

- Clean label functional proteins
- Binds & Emulsifies
- Allows for “source of” & “high in” claims

FEATURES	BENEFITS
Clean Label – additive free	Simplify label declarations
Bind fat & water	Control textures
High protein content	Make protein claims
Plant based	Suitable for vegan applications



Fibre Fortification

with scilia™

- Clean label functional fibres
- Binds fat & water, improves texture
- Allows for “source of” & “high in” claims

FEATURES	BENEFITS
Clean label – additive free	Simplify label declarations
Plant based & allergen free	Suitable for wide range of applications
Bind fat & water	Increase yield & succulence
Range of fibre lengths	Modify & control textures



03

Case Study: Reformulating a muffin

Control Muffins

A POINTS = 14

	Energy (kJ)	Sat Fat (g)	Total Sugar (g)	Sodium (mg)
Lemon Muffins	1500	2.9	23.3	329

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	>1350	>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

C POINTS = 1

	Fruit, Veg, & Nuts (%)	Fibre (g)	Protein (g)
Lemon Muffins	0%	1.1	5.0

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

HFSS Score = 13

Case Study

REFORMULATING A MUFFIN

Sugar reduction with
avanté 87 – Fortified wheat flour

Fat reduction with
delyte 5 – Tapioca starch

Protein fortification with
complex 18 – Wheat protein

Fibre fortification with
scilia WF90 – Wheat fibre



Non-HFSS Muffins

A POINTS = 7

	Energy (kJ)	Sat Fat (g)	Total Sugar (g)	Sodium (mg)
Lemon Muffins	1198	1.0	18.0	93.0

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	>1350	>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

C POINTS = 8

	Fruit, Veg, & Nuts (%)	Fibre (g)	Protein (g)
Lemon Muffins	0%	7.0	6.2

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

HFSS Score
= -1

Talk to US

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Calculate your HFSS Health Score

Please input product details and values for the appropriate macronutrients in each column below, this will automatically calculate your HFSS score.

Product Name

PRODUCT NAME*

Cinnamon Bagel

Product Type*

FOOD

BEVERAGE

HFSS Experience So Far

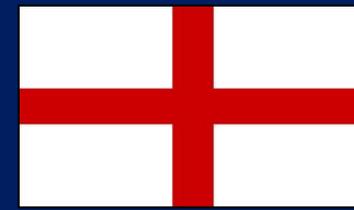
Louise Allen

Senior Executive of Diet and Health, FDF

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HFSS Promotional Restrictions



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

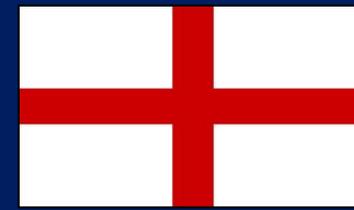
- Within a defined distance of store entrance or covered external area
- Within 2m of checkout facility / queuing area
- End of aisles
- Equivalent restricted online locations (home page, checkout page, pop ups, non-HFSS product searches)
- Exemptions: Small stores and specialist retailers.

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 Promotional Restrictions



fdf

Volume promotions on HFSS products in force from 1 October 2025

Mechanisms in scope

- Multibuys (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

Volume promotions are already in decline from 10.1% of legislation categories in Jan 2019 to 4.6% (online Kantar article June 2023*)



How have businesses reacted?

FDF member products provide...

- 13% fewer calories
- 15% fewer sugars
- 24% less salt

...into the average shopping basket than 8 years ago

Kantar Worldpanel data for FDF members 2015 vs 2022



How Impactful has this been?

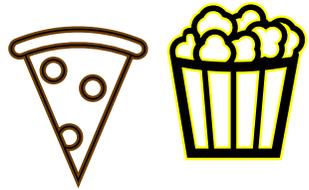
Recent data suggest that the rules seem to be steering shoppers towards healthier options.

- **NielsenIQ:** Non-HFSS products have gained share of units sold in the fresh food, frozen and impulse categories, (but not in ambient grocery). (NielsenIQ: [52 weeks ending 30 June 2023](#))
- **Kantar:** At the end of 2022, volume sales of HFSS products were reduced by 5.1% and non HFSS products increased by 1.7% compared to 2021. (Kantar [Healthier habits for Christmas](#). 12 weeks ending 25 Dec 2022)
- **Kantar:** The average shopping basket in the UK has become healthier, with a 9% reduction in the Nutrient Profile Model score since 2018. (Kantar Worldpanel Take Home data for Total Food and Drink market, Nutrient Profile Model Score 2022 vs 2018)



How Impactful has this been?

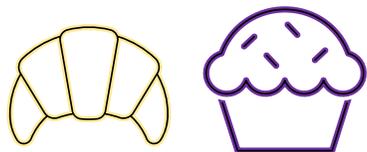
Data from Kantar* suggests some changes in HFSS purchasing one year after location restriction were implemented:



- Greatest reduction in purchasing of HFSS pizza, crisps and savoury snacks and breakfast cereals



- Little change in purchasing of HFSS chocolate confectionery and ice cream



- Increases in purchasing of HFSS morning goods and cakes

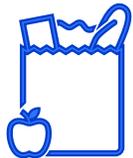
Evaluating Regulation in England – What’s Next?



Early 2025

University of Leeds, supported by the Institute of Grocery Distribution (IGD)

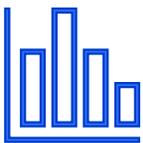
Evaluation of retailers’ sales data to review whether the HFSS ban in England has changed shoppers’ baskets. It will be the first academically rigorous test of the impact of the measures.



July 2026

City University (supported by University of Southampton and the Institute for Fiscal studies)

Study will look at HFSS buying habits in convenience stores, and to find solutions to boost the sales of non HFSS products.



2027

UK Government TBC

Official review and evaluation of the policy by the UK Government (5 years post implementation).

Key Resources – Reformulation for Health



Scottish Government
Reformulation for Health
Programme



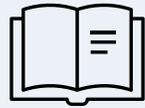
- Bespoke reformulation support for Scottish SMEs
- Run by FDF Scotland and funded by Scottish Government
- Support for specific projects also provided from a range of external partners.
- Work across ingredients suppliers, food and drink manufacturers, wholesalers, retailers, caterers, and academia.

**Reformul8
Partnership**

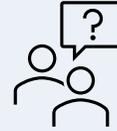
Helping Scottish food
businesses **Reformul8**
for a healthier future



Key Resources



FDF HFSS
Toolkit



Association of
Convenience Stores
Guidance



British Retail Consortium
Category Guidance



HFSS Policy in Wales

Ed Wilson

Deputy Director Public Health Improvement, Prevention and Promotion, Welsh Government

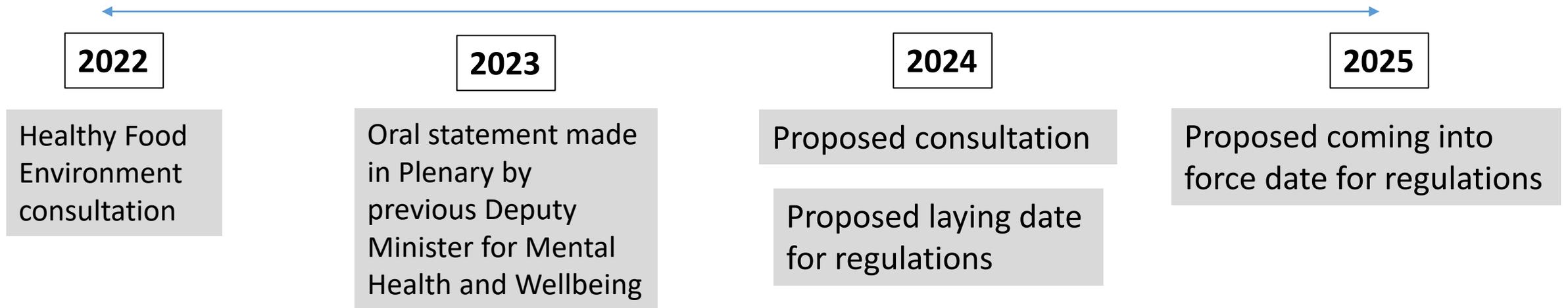
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Timeline for Wales



Llywodraeth Cymru
Welsh Government



HFSS Policy in Scotland

Cheryl McNulty

Restricting Promotions Team Leader, Diet and Healthy Weight, Scottish Government

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IMPROVING
SCOTLAND'S
HEALTH



HFSS Promotion Restrictions

Cheryl McNulty
Diet and Healthy Weight Unit
Scottish Government



Scottish Government
Riaghaltas na h-Alba
gov.scot



Policy Aims

- The primary aim of the policy is to reduce the public health harms associated with the excess consumption of calories, fat, sugar and salt, including the risks of developing type 2 diabetes, various types of cancer and other conditions such as cardiovascular disease.





Policy Context

- [A Healthier Future – Scotland's Diet & Healthy Weight Delivery Plan](#) is the Scottish Government's main strategy for supporting healthy weight.
- The plan acknowledges that no single intervention can turn the tide on Scotland's high levels of overweight and obesity





Background

- On 30 May in a statement to Parliament the Minister for Public Health & Women's Health set out plans to consult on the detail of proposed regulations to restrict the promotion of less healthy food and drink, with a view to laying regulations before the Scottish Parliament subject to the outcome of the consultation.
- As part of a programme of extensive engagement Ministerial roundtable events took place in November and December 2023.
- Outputs from the roundtable events helped to further inform the consultation document and accompanying partial Business and Regulatory Impact Assessment (BRIA) that was published on 27 February 2024. The consultation closed on 21 May.





Consultation

The consultation sought views on, amongst other things,

- o price promotions within scope of restrictions, including meal deals and temporary price reductions.
- o approach to placement restrictions of targeted foods in store and online.
- o qualifying businesses in scope of restrictions, including exemptions for small businesses based on employee number and floor space.
- o proposed approach to enforcement and implementation.





Next Steps

- Analysis of consultation responses
- Continued programme of stakeholder engagement
- Continued work to develop a suite of impact assessments
- Continued monitoring of developments elsewhere in UK
- Decision on final policy
- Guidance development
- Lay regulations before Scottish Parliament





Contact Details

If you have any questions, please get in touch via

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](#)
- [Restricting Promotions of Food and Drink High In Fat, Sugar or Salt: Partial Business and Regulatory Impact Assessment - gov.scot \(www.gov.scot\)](#)
- <https://publichealthscotland.scot/publications/transforming-our-food-environment-a-spotlight-on-promotions/>
- [What is secondary legislation | Scottish Parliament Website](#)



Further HFSS Advertising Rules

Chris Walker

Head of Policy and Government Affairs
Advertising Association

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HFSS / LHF Restrictions: Current State of Play

June 2024



What we know



Health and Care Act 2022

2022 CHAPTER 31

to make provision about health services in England.

[28th April 2022]

ENACTED by the Queen's most Excellent Majesty in Council, and with the advice and consent of the Privy Council, and by the authority of the House of Commons, in pursuance of a Bill passed by the House of Commons and by the House of Lords in pursuance of a Bill passed by that House, and with the assent of the Queen, as follows:-

HEALTH SERVICE IN ENGLAND: COMMISSIONING, COLLABORATION AND OTHER CHANGES

NHS England

1 NHS Commissioning Board renamed NHS England

- (1) The National Health Service Commissioning Board is renamed NHS England.
- (2) Schedule 1 contains consequential amendments.

2 Power to require commissioning of specialised services

- (1) Section 3B of the National Health Service Act 2006 (Secretary of State's power to require commissioning of specialised services) is amended as follows.
- (2) For subsection (2)

“(2) A service
Secretary
arrange

tion (1)(d) only
e for NHS Eng
her by NHS I

- 1st October 2025
- HFSS vs. LHF
- Labour committed to implementation
- Total ban on “paid for” advertising online; watershed ban for TV and ODPS
- Brand exemption

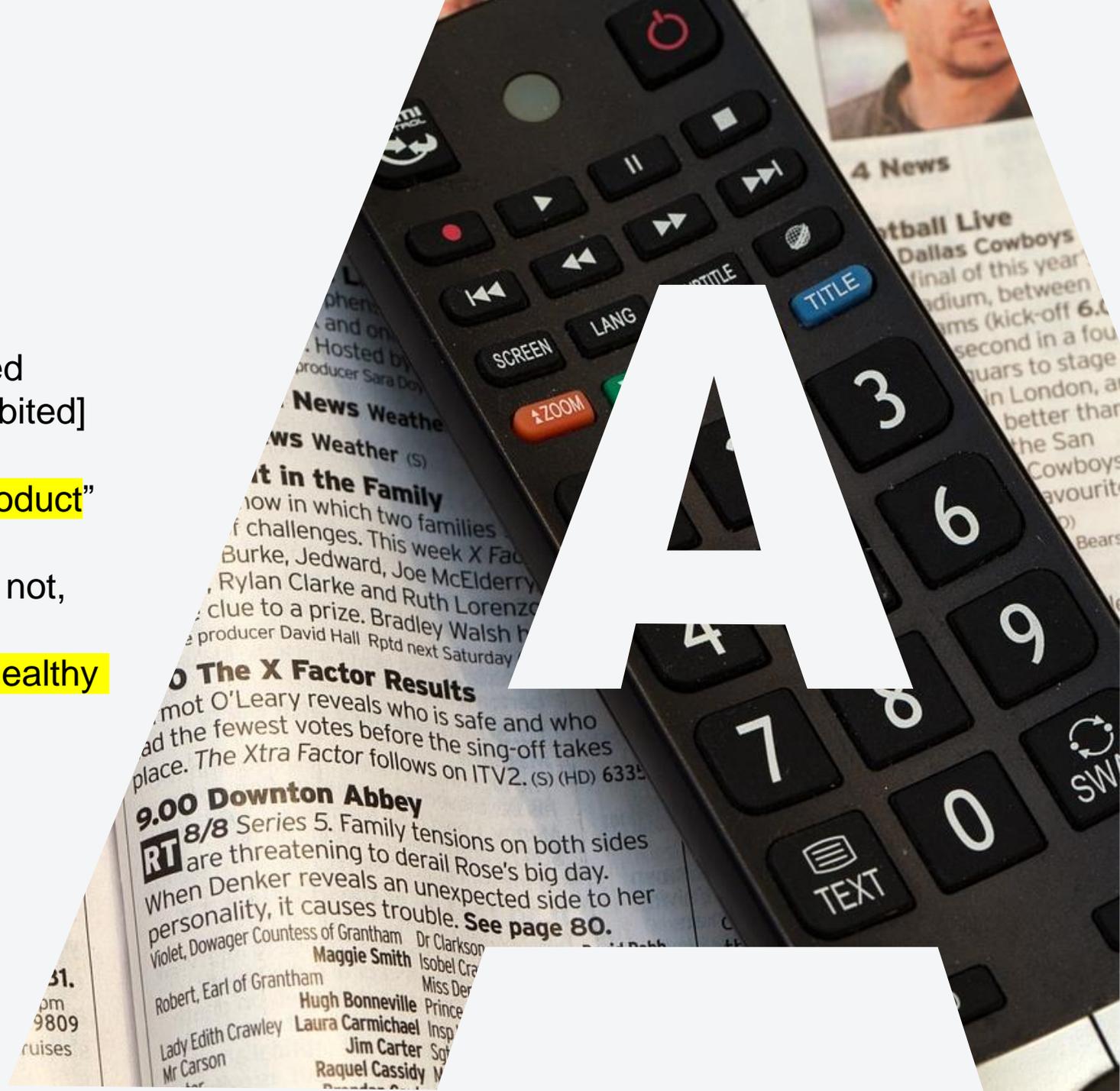
Online Ban

- “A person must not **pay** for advertisements for an **identifiable less healthy food or drink** product to be placed on the internet”
- Exemptions:
 - *SMEs*
 - *Intended for non-UK audiences*
 - *Radio services*
- “Owned media” is fine



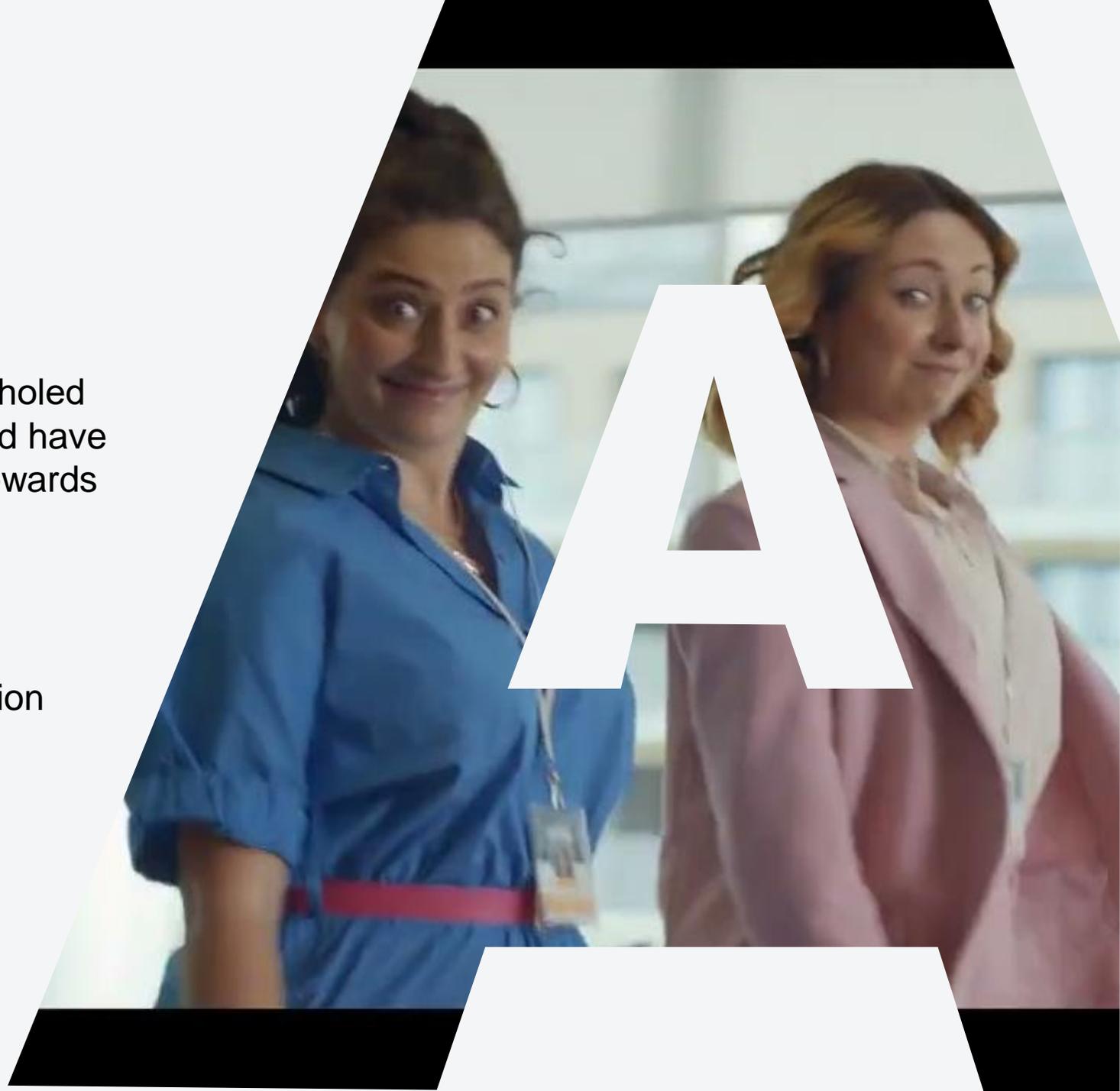
TV/ODPS Ban

- “Television programme services provided between 5.30am and 9.00pm [are prohibited] from including advertisements for an **identifiable less healthy food or drink product**”
- “On-demand programme services must not, between 5.30am and 9.00pm, include advertisements for an **identifiable less healthy food or drink product**”
- SMEs are exempt



Brand Exemption

- “...to ensure that brands are not pigeonholed as synonymous with HFSS products and have the freedom to reformulate and move towards offering healthier products”
- Conflict with CAP / BCAP guidance
- Waiting for full ASA guidance post-election



What we don't know

- Secondary Regulations
 - *Products in scope*
 - *Final definition of SME*
 - *Final definitions re: radio services*
- Final ASA guidance
 - *Definition of “identifiable”*
 - *Brand advertising guidelines*
 - *Sponsorship and influencers (“non-monetary payment”)*
 - *Prominence*
 - *“Blended imagery” (LFH / non-LFH): in-store vs online*
- Impact of election / further delay



Q&A

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