

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

Launch date: 29 July 2026
Respond by: 21 October 2026

This document 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.

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

- 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.

Please note that it is advised that respondents should first read the consultation document before attempting to respond to these consultation questions.

How to respond

The consultation will be open for 12 weeks from Wednesday 29 July 2026. Responses should be received by 23:59 on Wednesday 21 October 2026.

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 via the form below to

Executive.Support@food.gov.uk

Or write to:

Food Standards Agency in Northern Ireland

10A-C Clarendon Road

Belfast BT1 3BG

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

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) ☒

The Royal College of Physicians of Edinburgh

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 ☐

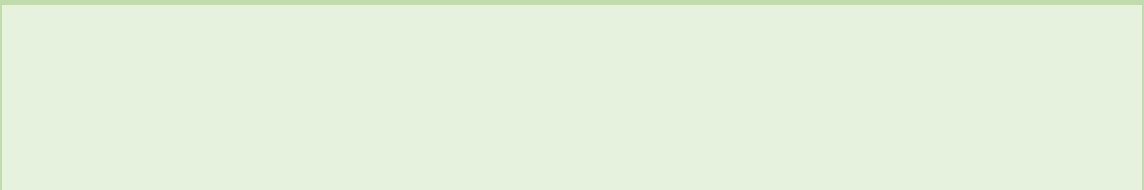
17. Do you agree with the proposed exemptions (e.g., micro and small businesses, care homes, educational settings)?

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

This approach seems to be the most proportionate at this stage.

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

We consider it to be very important for councils to have sufficient resources to enforce the policy comprehensively and that levels of support for this should be reviewed regularly.

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?

The RCPE has consistently supported the restriction of the promotion and placement of foods high in fat, salt or sugar as these foods contribute so much to over consumption, obesity levels and other negative health impacts including the development of diabetes and hypertension. We are aware of a number of academic studies that indicate the benefit of these proposed restrictions.

We would wish to highlight the National Centre for Social Research's positive findings in relation to location-based placement restrictions in England (introduced in October 2022) and the replacement of confectionary products with non-confectionery or healthier categories. (1)

In addition, research highlighted by Obesity Action Scotland indicates that in-store advertising and prominent end-of-aisle positioning strongly stimulate unplanned and impulse purchases, meaning removing HFSS items directly reduces these triggers. (2)

1 <https://natcen.ac.uk/sites/default/files/2025-02/HFSS%20Display%20in%20Supermarkets%20-%20Report.pdf>

2. <https://www.obesityactionsotland.org/media/i0pjseuy/hfss-promotion-restrictions-oas-evidence-overview-website-ready.pdf>

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?

We would refer to the evidence referenced in relation to health in question 25.

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?

The Royal College of Physicians of Edinburgh (RCPE) agrees with the Northern Ireland Executive that obesity is a major and increasing public health challenge that requires to be tackled on a cross portfolio basis.

We consider that all aspects of the obesogenic environment need to be considered, including access to foods high in fat, salt or sugar and the relative cost and promotion of these products and therefore welcome these proposals which align with elsewhere in the UK. We hope that all parts of the UK will consider further restrictions in due course.

In addition to restricting the promotion of unhealthy food, the RCPE would wish to see significant emphasis given to the positive facilitation of promotions of healthy food product choices, both unprocessed foods (eg. fruit and vegetables) and healthier processed foods. The RCPE looks to the Northern Ireland Executive to work constructively with retail, food sector and other industry and relevant stakeholders to put in place support for the promotion of healthier foods.

Thank you

We thank all respondents for their engagement with this consultation and for providing their views and evidence.