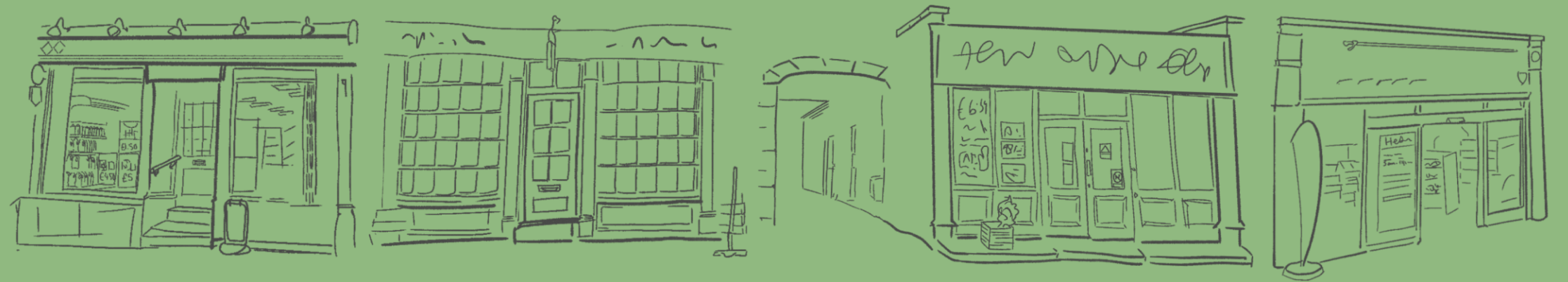


Power and the UPF environment



May 2025

Dan Crossley, Executive Director



Food Ethics Council

Background and register of interests:

Dan Crossley: I have worked in the not-for-profit/ charity sector on food systems, sustainability and justice for 20 years. Before that, I worked for a food manufacturing company for 2 years.

I write a regular column for The Grocer, a food sector magazine (unpaid)

Food Ethics Council is not-for-profit. Most of our income is from charitable trusts and foundations. As one part of our work, we run a Business Forum, a space for people from food businesses to come together to explore contentious issues. Participating businesses pay a membership fee, which when combined makes up about 10% of our income each year. Business Forum members include Sainsbury's, Coop, McDonalds UK & Ireland, Greggs, Caffè Nero and Yeo Valley. Full list here: <https://www.foodethicscouncil.org/engage/our-business-forum/business-forum-members/>

Food Ethics Council does not do individual consultancy with businesses, as our independence is important to us.

What I will talk about

- *Food environments*
- *Power in food systems in general*
- *Influence of power in food environments*
- *Power and UPFs specifically*

NOTE: I'm not yet talking specifically about UPFs



What are 'food environments'?

“Where we live, work, shop and learn can affect the food we eat and how healthy we are. We call this the food environment: it could be your neighbourhood, workplace or even online, and it includes **everything you experience in those places relating to food**. It is the availability, accessibility, affordability and advertising of food.”

(Hugo Harper, Nesta, <https://www.nesta.org.uk/blog/foundations-what-is-the-food-environment/>)

Some definitions of 'food environments':

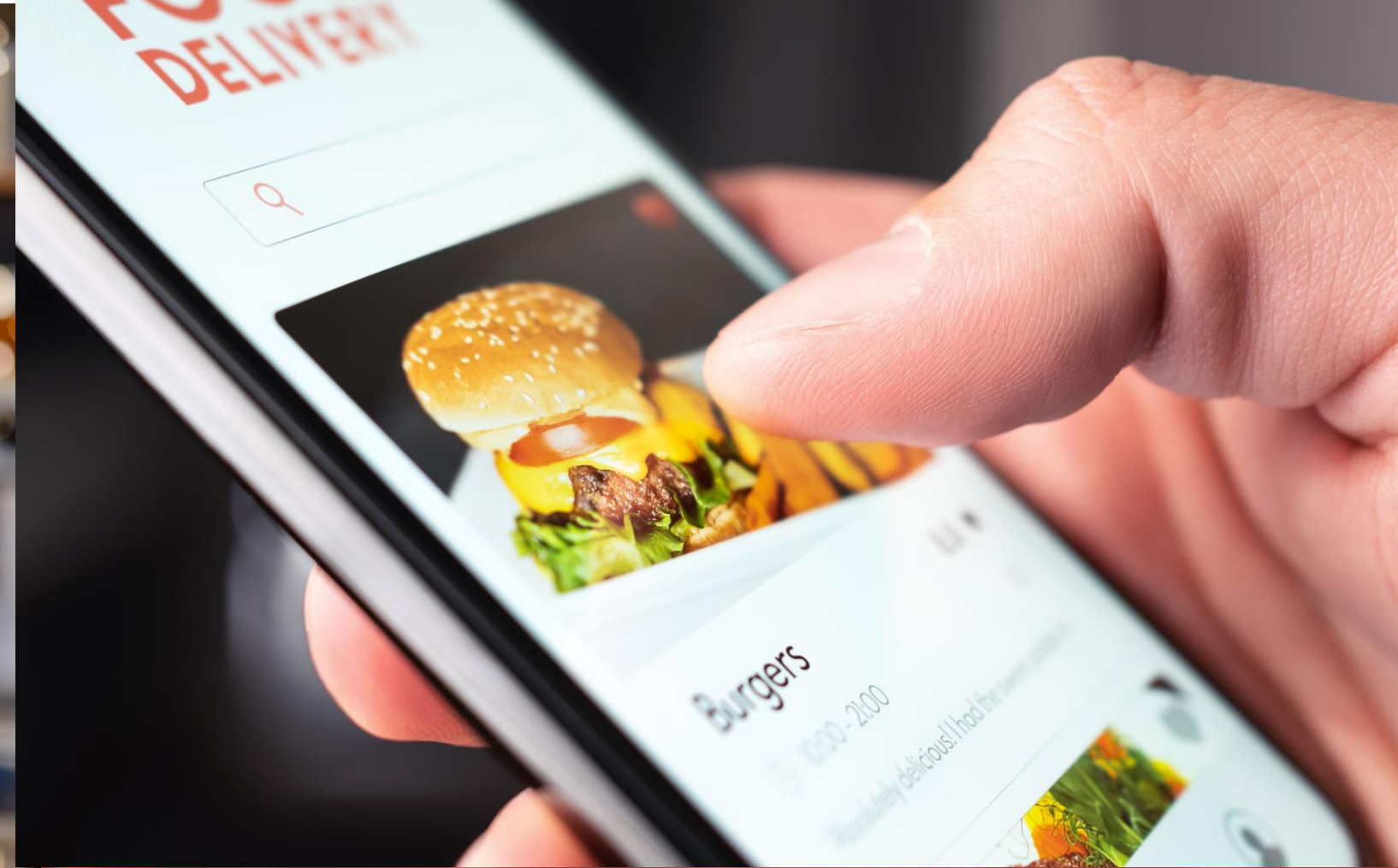
“The physical, economic, political and socio-cultural contexts in which consumers engage with the food system to make their decisions relating to food” (High Level Panel of Experts on Food Security and Nutrition, 2017)

<https://openknowledge.fao.org/server/api/core/bitstreams/4ac1286e-eef3-4f1d-b5bd-d92f5d1ce738/content>)

“**The interface between people and food systems**” (European Public Health Alliance, 2021)

<https://epha.org/wp-content/uploads/2021/10/policy-briefing-i-discovering-the-role-of-food-environments-for-sustainable-food-systems-eufpc-october2021.pdf>

“**The point at which food supply meets us as food citizens**” (Anna Taylor, Food Foundation, 2025)



Examples of some different food environments



FOOD ENVIRONMENT METRICS

APPEAL



Food promotions P10

Over a third (37%) of supermarket promotions on food and non-alcoholic drinks are for unhealthy food.



Advertising expenditure on food P12

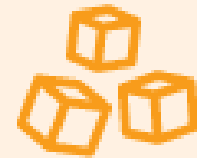
Over a third (36%) of food and soft drink advertising spend is on confectionery, snacks, desserts and soft drinks, compared to just 2% on fruit and veg.



Marketing of infant foods P16

Three-quarters (74%) of the baby and toddler snacks that have front-of-pack promotional claims contain high or medium levels of sugar.

AVAILABILITY



Sugar in children's food products P20

Only 3% of breakfast cereals and 5% of yogurts marketed to children are low in sugar.



Places to buy food P21

A quarter (26%) of places to buy food in England are fast-food outlets, remaining unchanged for six years.

PRICE AND AFFORDABILITY



Cost of more sustainable options P26

More sustainable, plant-based milk alternatives in supermarkets are on average 55% more expensive than dairy milk.



Cost of healthy food P28

On average, healthier foods are more than twice as expensive per calorie as less healthy foods, with healthier food increasing in price at twice the rate in the past two years.



Affordability of a healthy diet P30

To afford the government-recommended healthy diet, the most deprived fifth of the population would need to spend 45% of their disposable income on food, rising to 70% for those households with children.

Source: Food Foundation, Broken Plate 2025

<https://foodfoundation.org.uk/publication/broken-plate-2025>

NOTE: the above food environment metrics are **not** specifically about UPFs

NOTE: I'm not yet talking specifically about UPFs



What does power mean in food systems?

There are different types of power: e.g. influence over policymaking, decision-making, ideas, price-setting, advertising...

Some controls are in place – to try to prevent:

- **power being abused** e.g. Groceries Code Adjudicator, which regulates relationships between the largest grocery retailers and their direct suppliers.
- **companies holding too much power** e.g. CMA (Competition and Markets Authority) investigates potential anti-competitive effects of mergers, and can take action to prevent or modify mergers deemed harmful to competition.

Are those safeguards enough?

Press release

CMA blocks merger between Sainsbury's and Asda

The CMA has blocked the Sainsbury's / Asda merger after finding it would lead to increased prices in stores, online and at many petrol stations across the UK.

From: [Competition and Markets Authority](#)

Published 25 April 2019

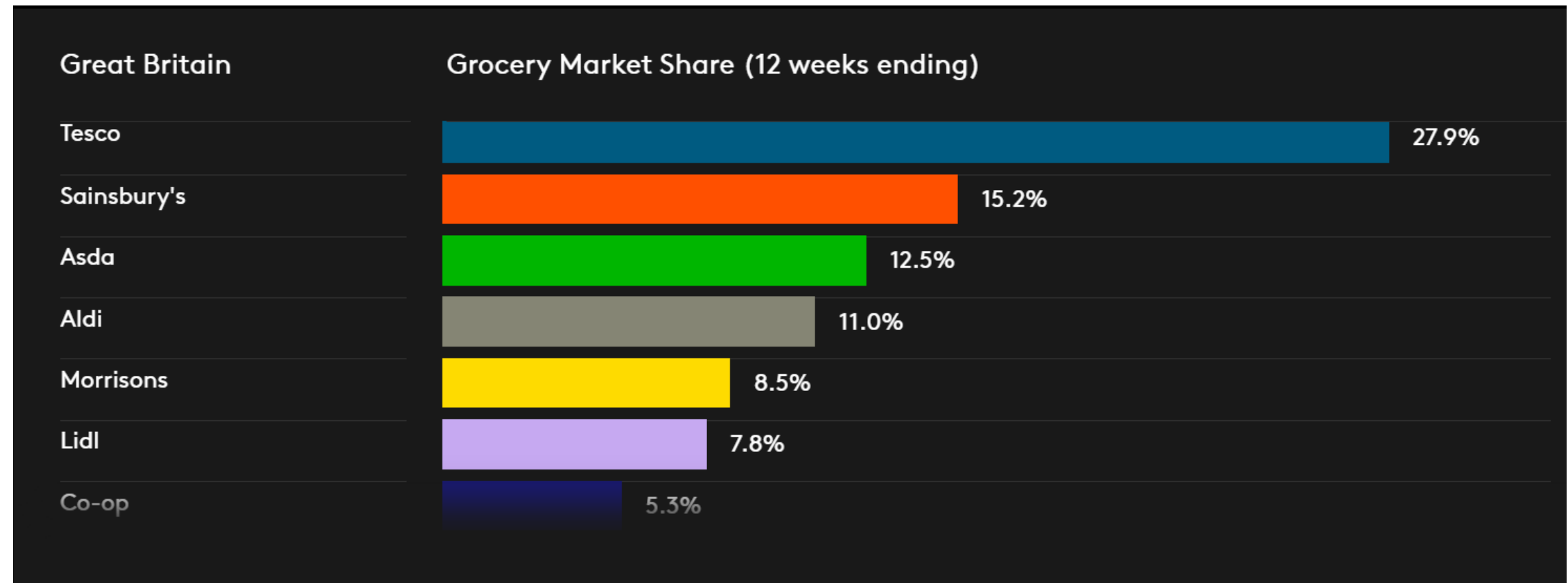


Who holds corporate power?

Food retailers: Almost £8 in every £9 spent on groceries in GB (88%) is with just seven supermarkets. In Northern Ireland, over £7 in every £9 spent (78%) is with the four largest supermarkets.

Seed companies: Dominated by a very small number of large global corporates

Multinational food and drink brands: e.g. Nestle, Unilever, PepsiCo, Kelloggs, Coca Cola...



Source: Kantar (March 2025) <https://www.kantarworldpanel.com/grocery-market-share/great-britain>

‘Out of home’ sector (restaurants, cafes, contract catering etc): Much more fragmented, although it still contains powerful (often global) brands

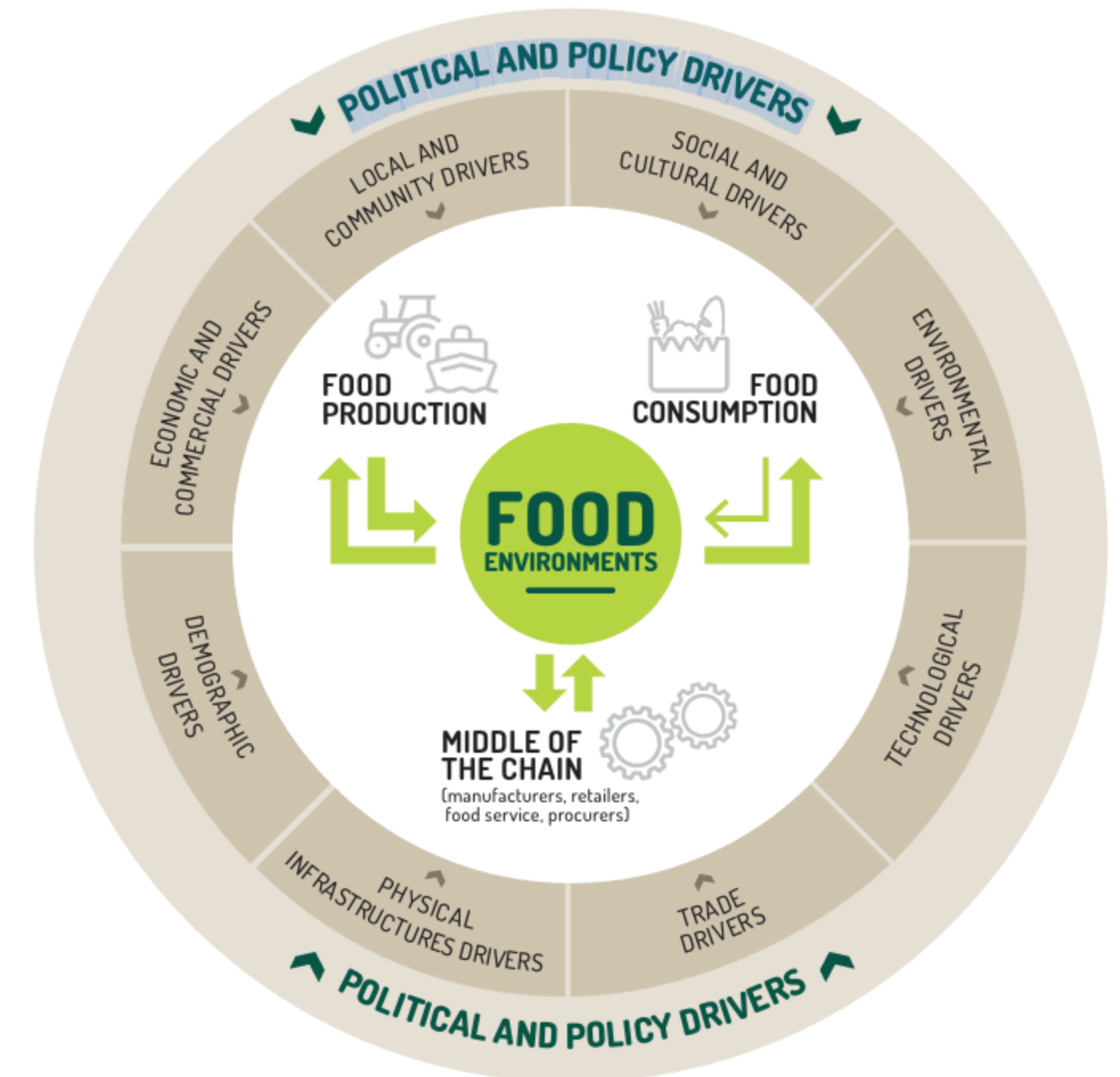
Where can we see the influence of power in food environments?

THE FOOD ENVIRONMENT AS AN INTERFACE BETWEEN PEOPLE AND FOOD SYSTEMS

WHO IS RESPONSIBLE?

Some argue it's all about individual responsibility and that the power lies with individuals who have the power to choose what they buy and eat.

Others argue it's the corporates who shape the food environment around us and who are responsible for providing us, the buying public, with better options, and point out that not everyone can access or afford certain foods



In relation to UPFs, who might have power?



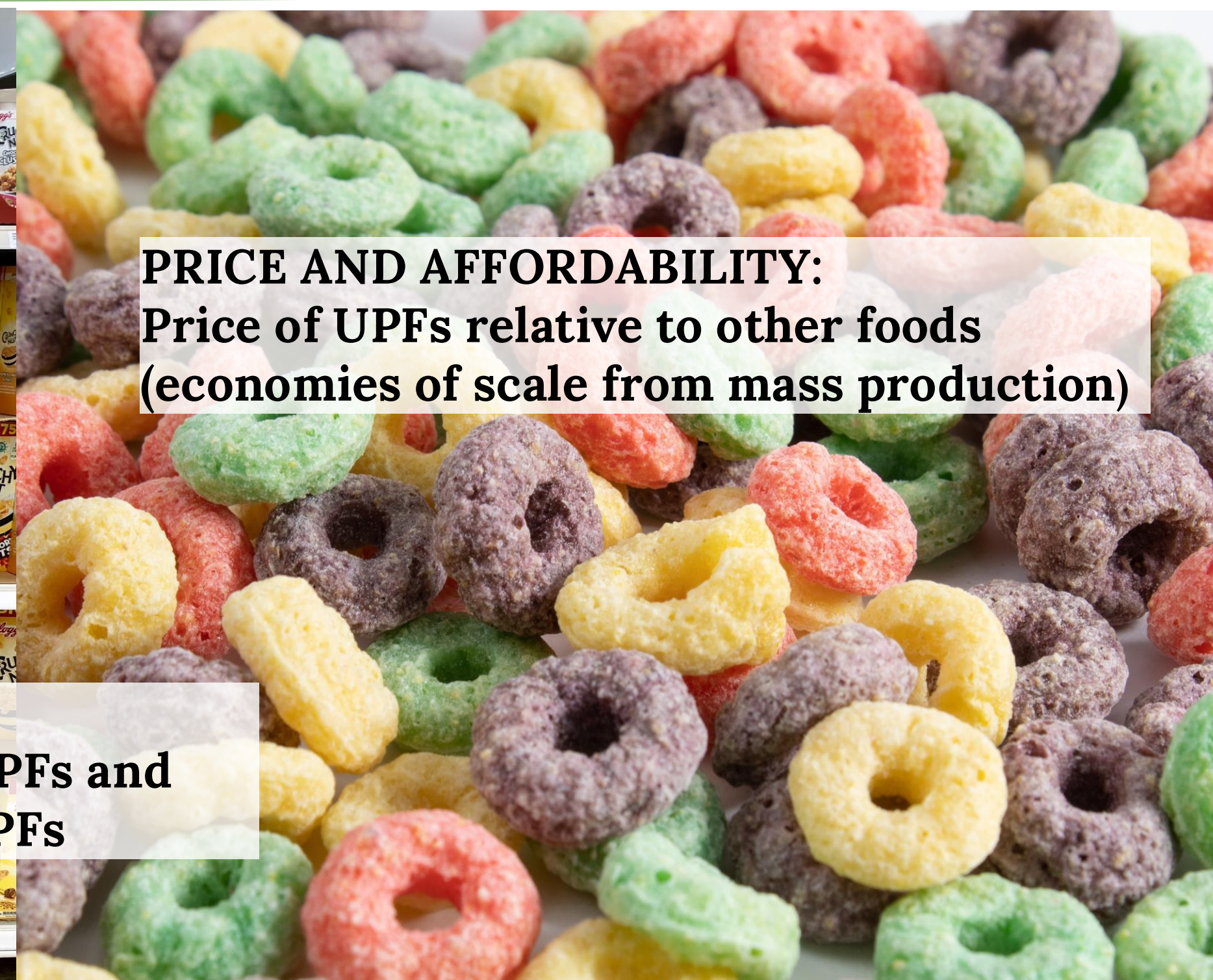
- **Corporations** making, buying and selling UPFs, and lobbying government
- National **governments** – setting policies, regulation, restricting marketing, dietary guidelines...
- **Metro mayors and local government** – may have power to restrict advertising on UPFs
- **Scientific advisory bodies** e.g. SACN (Scientific Advisory Committee on Nutrition) – scientific guidance and evidence on health effects; + public health experts, **researchers** and academics
- **Regulators** e.g. FSA (Food Standards Agency) regulates food additives
- **International organisations** e.g. World Health Organisation sets guidelines on food marketing
- **Advertising** agencies/ companies – helping advertise and promote (or not) UPFs
- **Media** e.g. influential podcasters, authors – influencing public opinion on UPFs
- **Civil society** e.g. non-governmental organisations (NGOs) – lobbying government to act

NOTE: Power is not evenly spread across these groups.
Some have more power and influence than others.

Where do power relationships show up in the food system in relation to UPFs?



AVAILABILITY:
Product ranges – how dominant and prominent UPFs are in store



PRICE AND AFFORDABILITY:
Price of UPFs relative to other foods (economies of scale from mass production)

APPEAL:
Promotions of UPFs and advertising of UPFs

A quick summary

Environments: our interface with food systems

Important to consider power in food systems – who has power and how do they use it (or abuse it)?

Power and responsibility affect food environments

- Power dynamics affect the availability, affordability and appeal of*