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## **Developing a Standard for the Responsible Marketing of Food and Drink:**

### **Stakeholder Perceptions of Benefits, Barriers and Enablers**

**ISM** Institute *for* Social Marketing

A collaboration between the University of Stirling and The Open University

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## EXECUTIVE SUMMARY

Stakeholder views on Scottish Government plans to develop an independent standard in responsible food marketing were explored. Interviews with key informants drawn from a range of professional sectors and consumer focus group discussions provide insight on early responses to the initiative and views on anticipated benefits, barriers and critical success factors.

General findings were:

An initiative that benchmarked responsible food marketing and that could provide leadership and clarity on good practice was almost universally welcomed. There was strong support for the concept of a standard that could result in less intensive marketing of high fat, salt, sugar foods and a standard that addressed all forms of marketing. Independent oversight and third party verification of a voluntary approach was welcomed.

Factors anticipated as key to positive engagement of stakeholders in standard development and adoption were:

- Demonstrable commercial opportunities (reputational benefits, marketing innovations).
- Demonstrable consumer demand.
- Clarity on goals of the standard and performance indicators to be applied to all elements of the marketing mix.
- Participatory development process.
- Standard scope and specifications that proportionately reflect public health and economic fundamental needs and priorities.
- Demonstrable evidence that standard specifications are independent and robust in their scope and objectives.
- Strong branding to communicate the purpose and benefits of the standard.

Key potential barriers were:

- Few benefits for business where HFSS foods are core to profit margins.
- Not aligned/perceived as misaligned with other standards/codes of good practice.
- High costs of participation (audit and certification fees, internal administrative costs etc.).
- Complex and resource intensive implementation, especially for small and medium size enterprises.
- Public misperceptions that the standard in some way is an endorsement for some HFSS foods.

Significant strategic enabling factors recommended were:

- Confidence that a 'fit for purpose' standard can be developed and effectively applied needs to be nurtured. Scottish Government leadership in benchmarking and validating good practice and recognition of BSI's track record in standards were widely recognised and thus provide a good baseline from which to strengthen confidence.
- Strategic public relations expertise should be used to monitor and manage expectations and to build positive recognition of the standard and its aims.

## **BACKGROUND AND RATIONALE FOR RESEARCH**

The Scottish Government has appointed the British Standards Institute to lead the development of an independent marketing standard. The standard will provide a detailed specification for the responsible marketing of foods and drinks. For the purposes of this research, the working description of responsible marketing has been outlined as *'marketing that reflects and supports official dietary recommendations. Official dietary recommendations are based on best scientific evidence currently available and are endorsed by public bodies such as the Scottish Government'*.

Internationally, such a standard will be the first of its kind. It is a unique, and to date untried initiative. There is therefore limited information on how this can be optimally progressed. To address this evidence gap and to support the development process as it goes forward, the Scottish Government commissioned the Institute for Social Marketing to conduct a survey of stakeholder perspectives. The purpose of the research was to identify common and divergent perceptions on benefits and barriers to stakeholder engagement and the potential utility and feasibility of the standard to promote responsible marketing of foods and drinks.

## METHODOLOGY

### Sampling

To capture perspectives of stakeholders with professional interests in a responsible marketing standard for Scotland/or expertise in the food marketing and public health domain, we conducted interviews with selected key informants. Key informants were identified from personal knowledge and records of their previous active engagement in the issue and through snowballing as the survey progressed. Individual key informants were purposely selected to represent a pre-defined cross-section of professional stakeholder sectors. Difficulties were experienced recruiting key informant participants from some sectors but the final sample did achieve representation from all target sectors (see **Tables 1 and 2 in Appendix 1**).

To capture the perspectives of consumers, we conducted focus group discussions. A 2 x 2 factorial design was used to ensure our sample was appropriately representative of the Scottish consumer population with regards to gender, socio-economic status, rural/urban residency, shopping behaviours and interest in dietary health (see **Table 3 in Appendix 2**). Screening questions at the recruitment stage were used to exclude consumer who expressed extremes of interest/no interest in healthy eating.

### Key Informant Interviews

Telephone interviews were conducted with twenty key informants between March and May 2013. Interviews followed a semi-structured discussion guide (see **Appendix 3**). The design of the discussion guide and the conduct of the interviews were designed to capture the varying levels of expertise, knowledge and interest in potential challenges, barriers, enablers, motivators that stakeholders might consider relevant to the development of a responsible food marketing standard. Starting questions and probes were organised around the following themes:

- Perceived challenges and barriers to a constructive and timely standards development process.
- Options and resources available to address and resolve anticipated challenges and barriers.
- Critical resource and process factors to inform and guide development of effective and enduringly relevant standards.
- Critical gaps in knowledge and evidence base required to inform and guide development of effective and enduringly relevant standards.
- Underpinning principles critical to robust standards.
- Incentives and disincentives to engagement in development and roll out of a formalised independent standard process.

Interviews took between 15 minutes and one hour to complete, and were audio recorded and transcribed. Transcripts were coded using the qualitative data analysis software package Nvivo10, and a thematic analysis was conducted.

## Focus Group Discussions

Four consumer focus group discussions were conducted in February 2013. Discussions were facilitated by two researchers who followed a semi-structured discussion guide (see **Appendix 4**). Stimulus materials including breakfast cereal and fruit juice packaging, a mock-up logo for the proposed standard, and magazine advertisements for food and drink products were used to promote discussion. The discussions aimed to gain consumer insights around the following questions:

- How can credibility and legitimacy for an independent standard be achieved?
- How and why are consumers likely to use third party certification of an independent standard in responsible food marketing?
- What barriers to consumer use of third party certified standards exist? How can these be overcome?
- What do consumers need, want, like and dislike in current first, second and third party standards?
- How could the added value of third party certified standards best be made available to consumers?
- How can the third party certified standard 'promise(s)' be meaningfully communicated to consumers?

Focus group discussions took between 1 hour and 1.5 hours to complete and were audio recorded and transcribed. Transcripts were coded using the qualitative data analysis software package Nvivo10, and a thematic analysis was conducted.

## Ethics

Ethical approval for the study was granted by the University of Stirling Institute for Socio-Management Ethics Committee in February 2013.

## RESULTS

The research results are presented under general topic headings which were developed and refined through the iterative thematic analysis process. The extent and nature of individual key informant and consumer discussion around each topic area varied depending on levels of experience and expertise.

### Views on Food and Drink Marketing

Key informants as well as consumers universally recognised that marketing includes more than advertising activities. For example, price promotions, point of sale displays, packaging design and sponsorship were some of the marketing activities spontaneously mentioned by respondents.

Consumers and some key informants commented that marketing emphasis tends to be on HFSS foods. In particular, consumers expressed beliefs that most retail price promotions are for HFSS foods. Retailers on the other hand expressed the view that a significant proportion of their price promotions are for fruits and vegetables.

There was a feeling among consumers that food and drink marketing can be misleading and difficult to understand, particularly in relation to on-pack nutrition and health related messaging. It is clear, however, that the informational aspect of such marketing is valued as an aide to decision making, particularly for those with special dietary requirements or an interest in health. Consumers stated that they struggle to know what to believe.

Some key informants expressed views that children are more susceptible to negative effects of food marketing than adults. Consumers initially expressed views that they were not particularly susceptible to the influence of marketing, with the exception of price promotions such as BOGOF (buy one get one free) offers. As discussions progressed however, consumers increasingly commented that purchases were influenced by branding, on-pack marketing and point of sale displays. In comparison to not for profit key informants and consumers, commercial sector key informants more commonly expressed views that marketing had little influence on consumer purchasing behaviour.

Among the key informants interviewed, opinions on what constitutes responsible marketing practice ranged widely. Views ranged from 'there is no way to responsibly market HFSS foods' to 'all foods can be enjoyed as part of a balanced diet ... HFSS foods can be marketed responsibly as long as the message is not that they should be consumed frequently and in large quantities'. There was also a feeling among some commercial sector key informants that food and drink companies and retailers are already marketing responsibly. There appeared to be consensus that a message of appropriate consumption frequency and volume was core to responsible marketing.

Several key informants and consumers commented on the credibility of the food and drink industry in general. Most comments expressed the view that industry credibility was low. There were multiple references to the recent horsemeat scandal, and there was consensus that although this scandal had further undermined reputation, a lack of public trust was a long term phenomenon.

*Recognition of the multi-faceted  
nature of marketing*



*Recognition that responsible marketing explicitly reflects HFSS food consumption advice*

## **Understanding of Proposed Standard**

The concept of a standard for responsible marketing was generally not well understood by consumers even when explained in detail. Consumers found it difficult to differentiate between the health and nutritional attributes of food products and the marketing of those products. There was a widespread misunderstanding among consumers that certification would be a guarantee that food products were 'healthy', or that the on-pack nutritional information had been independently tested and checked for accuracy. Some key informants also had difficulty grasping the concept.

There was varying experience of standards and codes of practice among key informants including experience of both development and implementation. Those with more experience generally had a better understanding of the proposed standard and provided particularly rich comment and perspective.

Many key informants questioned how PAS 2500 would relate to existing advertising standards and codes such as the Ofcom Broadcasting Code, the Advertising Standards Authority Code of Advertising Practice, codes and regulations such as FSA's nutrient profiling and Traffic Light labelling systems, and the EU Directive on Nutrition and Health Claims. The issue of how the standard would overlap with the remit of Trading Standards was also raised. There was a strong feeling that existing codes, standards and regulations should be taken into account in the development of PAS 2500, and it should complement these rather than contradict or attempt to replace them.

There were also questions around how the standard will relate to the Public Health Responsibility Deal. As many UK-wide manufacturers, retailers and catering companies that operate or trade in Scotland have signed up to the Responsibility Deal, views that the standards should take this into account what is already being done and to ensure that the scope of PAS 2500 complements this and avoids replication were expressed by commercial interest stakeholders.

Consumers, as well as a few key informants questioned what role, if any, the Food Standards Agency in Scotland will have in the standard. There was a feeling that FSA in Scotland has an important role and credibility in standards relating to food and drink, and as such they should be involved PAS 2500.

*More information on links with existing standards and codes of practice needed*

## **Voluntary Nature of Standard**

There was a strong preference for a voluntary approach to the control of marketing, as opposed to legislative controls among key informants from the commercial sector, and as such there was support for PAS 2500. Key informants from not-for-profit organisations generally viewed the voluntary approach as a compromise or 'half-way house' between their desire for legislative controls, and what they perceived as the commercial sector's desire to avoid marketing control.

There was a strong feeling from not-for-profit sector key informants that legislative routes should remain open if the voluntary approach does not meet objectives in terms of comprehensiveness, strength and uptake. There was, however, recognition among most key informants across the sectors that it would be practically challenging to legislate in this area, and this served to further strengthen support for the voluntary approach.

Despite being informed about the voluntary nature of the proposed standard, an assumption developed among consumers that it would be a compulsory standard. When reminded that it was intended to be a voluntary standard, there was scepticism that companies would sign up and the value of the entire initiative was called into question.

*Mixed but generally positive responses to voluntary approach*

## Views on Certification

Third party certification was perceived to be more credible than self-certification or second party certification by the majority of key informants.

Concerns were expressed by a few key informants from the commercial sector that a third party certification body may not have a good understanding of the retail, food and drink manufacturing and/or advertising and marketing sectors.

It was thought that food and drink manufacturers would be familiar with the concept of third party certification in the context of manufacturing and safety standards which are widespread in the sector.

*Strong support for independent third party certification*

## Broad Response to the Standard

There was a feeling among all respondents that there is a need for action to tackle the problem of obesity in Scotland. Recognition of this lay behind strong support of standard objectives.

There was a strong preference amongst commercial interest stakeholders for alternative approaches. Public education campaigns and more education in schools including cooking skills classes to promote healthy eating were frequently mentioned. Initiatives to improve access to healthy foods, particularly for low income consumers were recommended. Re-formulation of foods was also identified as an important approach to improving diets.

Two key informants from the commercial sector expressed the view that a standard is a mechanism for objectively defining and codifying good practice rather than a mechanism for achieving a policy objective such as changing the marketing landscape based on the subjective concept of 'responsible'. These key informants were strongly opposed to PAS 2500.

Consumers generally responded very positively to the idea of the standard on the basis that it would make it easier for them to make healthy choices. However lack of understanding of the concept means some support is probably attributable to the assumption that the standard will signal healthy products, rather than responsible marketing.

*Consensus that action needs to be taken to tackle the problem of obesity*

*Broad support for the standard*

## Anticipated Benefits and Negative Impacts

### Sector Level Change

A standard that would formally define and codify good marketing practice, and facilitate objective assessment of performance was perceived to be beneficial for the commercial sector. Although there was limited consumer discussion around the idea that the standard could result in changes to industry marketing norms, there was repeated reference from key informants to the fact that the standard has the potential to create a 'level playing field' for food and drink businesses in terms of marketing.

Several key informants raised the possibility that the standard may have a positive impact on food and drink marketing practices outside Scotland. Some commercial sector key informants commented there could be a negative impact on the reputation of food and drink and retail sectors because the initiative implies that some marketing practices are irresponsible.

*Codification of good practice is welcomed*

*Moderate optimism that the standard can changes industry norms*

### Corporate Reputation

A majority of key informants commented that certification would recognise and reward good marketing behaviour and would enable companies to demonstrate that they were marketing in an ethical manner. The tie in with corporate social responsibility was viewed positively and its potential to positively impact on corporate reputation was assessed as small but positive.

Consumer focus groups commented that consumers may be suspicious of companies that did not have certification. Some key informants also commented on the risk of negative impact on the corporate reputation of companies who do not sign up to the standard.

*Potential benefits of certification  
on corporate reputation widely  
recognized*

### **Financial Impact**

Consumers asserted that they may be more likely to choose a PAS 2500 certified brand than an uncertified brand.

There was a feeling among many key informants across all sectors that businesses may be reluctant to engage with a standard that is intended to reduce any product sales.

Several commercial sector key informants raised the concern that the additional costs to businesses as a result of the standard would end up being passed on to consumers. Retailers suggested restrictions on price promotions on HFSS foods would not discourage consumer purchases.

*Mixed views about impact on  
profits, net negative effects  
anticipated*

### **Complexity and Administrative Burden**

The primary benefit of the standard from a consumer perspective was that it would make it quicker and easier for them to make healthy choices. The proposed standard was also valued by consumers if it provided reassurance that health related promotional information was marketing intent was trustworthy. These benefits were particularly emphasised by consumers with stronger motivations towards healthy eating.

There was concern among some key informants and consumers that a consumer-facing standard may be confusing and contribute to 'information overload'. Respondents commented that the food and drink retail environment is already cluttered with standards and that consumers often do not engage with or understand existing marques and certificates.

Many key informants, particularly those from or representing the commercial sector, discussed the increased administrative burden they anticipated the standard would place on businesses. As well as the cost implications of compliance, there was a perception that compliance would be complex and time consuming. This was viewed as a barrier to participation, particularly for small businesses. A stakeholder working in marketing emphasised the need for clarity about where the locus of responsibility for compliance would lie.

*Concerns about consumer  
'information overload'*

*Increased administrative burden  
on commercial sector anticipated*

## Public Health

There was good understanding that the objective of the standard is to reduce the incentives to purchase and consume HFSS foods. The potential of the standard to change industry marketing norms and benefit public health was viewed positively.

Few respondents questioned the in-principle potential of the standard to achieve its aims and to positively impact public health, although there was general uncertainty about the scale of impact. Some commercial interest stakeholders felt a cost-benefit analysis was required and some expressed opposition to what they perceived as the underlying assumption that the private sector shared any responsibility for consumer behaviours.

The greater susceptibility of children to the negative effect of food and drink marketing and therefore, the potential benefits to children's health were particularly emphasised by public health key informants.

The possibility that the standard could drive reformulation was raised by a small number of key informants.

*Potential benefit to public health  
recognized but effect size unclear*

## Key Factors Influencing Engagement/Support

The most strongly and most commonly articulated key informant view on factors influencing the commercial sector's engagement and support of the standard was that companies need to clearly see the benefits to participation. Most key informants felt that if companies are able to see the potential benefits to participation such as a positive effect on corporate image, then they are more likely to engage. Conversely, if the benefits of participation are not apparent to businesses, it was felt that they are unlikely to support or engage with the standard.

Several commercial interest stakeholders asserted that the majority of food and drink manufacturers and retailers are already practicing 'responsible marketing'. Many of the commercial sector key informants commented that many companies have already signed up to the Public Health Responsibility Deal or have their own health promotion initiatives. Drawing on their experience of the development and roll-out of an independent third party certified nutritional standard, one key informant stated that they experienced difficulties engaging retailers as they preferred to develop their own initiatives or versions of the standard. One key informant commented 'I would hope that there is not a food and drink company that is advertising irresponsibly or marketing irresponsibly at the moment'. The added value of an independent standard was on the whole seen as marginal.

Several key informants noted that food and drink manufacturers may not engage with or support the standard because they produce and/or retail HFSS food or drink products. In addition, one key informant highlighted the fact that some food and drink companies produce luxury and indulgence products or services that are unhealthy and are explicitly marketed as such. It was felt that these companies would be unlikely to engage with the standard. Companies who aim to promote their commitment to consumer health or a responsible/ethical ethos were viewed as being more likely to support and buy-in to the standard.

Consumer demand was identified by many commercial sector key informants as likely to be a significant motivating factor for commercial sector engagement.

The support of influential companies was considered to be a key factor in the success of the standard. A few key informants suggested that having industry pioneers and leading companies on board from an early stage would encourage other companies to participate.

There was also a view that companies generally oppose what they view as prescriptive approaches to business practices. In addition, it was very strongly articulated by most key informants from across the sectors that companies would be reluctant to sign up to the standard if they do not feel that they have been involved, or do not feel that they have been adequately represented in the development process. Feeling a strong sense of ownership, involvement in the process and feeling that their voice had been heard was considered a key factor influencing the commercial sector's support for the standard.

The financial implications of participation were also considered to be a key factor influencing the commercial sector's support for and engagement with the standard. The issue of the direct costs associated with certification was raised by most key informants, and it was anticipated that this could be a barrier to participation. This was considered to be a particular issue for small businesses who may not have the budget or resources to ensure compliance or to pay to be audited.

In terms of the Scottish remit of the standard, many informants from or representing the commercial sector raised the concern that the standard would result in increased complexity for businesses as very few operate or trade exclusively in Scotland. Retailers, for example were concerned that the standard would require them to have different marketing practices and activities in their Scottish stores from their other UK stores. The cost and increased administrative burden associated with this was identified as a barrier to participation, and preference was expressed for UK-wide initiatives.

There was a strong feeling among many key informants and consumers alike that consumer awareness and understanding are critical factors influencing consumer engagement with and support for the standard. Levels of engagement were thought likely to vary among consumers, with those with a strong interest in health most likely engage. There was a feeling that consumers may not engage with the standard if it failed to offer immediate benefits.

In terms of consumer support, concerns were raised by a few key informants that 'nanny state' accusations may be levelled by consumers if they view the initiative as the Government restricting consumer choice. In addition, it is clear that the perceived credibility of the standard is a key factor influencing consumer support. Consumers felt that the standard's credibility would be diminished in their view if it was associated with 'unhealthy' products, or with brands or products that they considered to be unethical.

The key factor influencing the public health community and civil interest groups' support for the standard was recognition of its potential benefits to public health. However, it was clearly articulated that this support would be undermined by perceptions that the standard was not robust in its scope and depth, or if there was a perception that the standard had been 'watered down' by commercial interests.

*Identify, nurture and communicate consumer and commercial benefits*

*Sense of ownership in standard development critical for commercial sector*

*Public health credibility of standard must be nurtured and protected*

## **Incentivising and Encouraging Engagement**

The majority of key informants expressed the view that it is important to incentivise companies to sign up to the standard, or there is a risk of limited uptake and failure. Some key informants from the public health community and civil interest groups expressed the view that incentivisation should use a carrot/stick approach, with clear and concrete benefits to participation and a credible threat of legislation should companies fail to step up on a voluntary basis.

One key informant shared their experience of incentivising food and drink manufacturers' participation in an independent third party certified nutritional standard. In the case of that particular standard, promotion of certified products on a consumer-facing website run by the certification body acted as a successful incentive to participation. Another key informant from a major UK supermarket suggested that retailers may be incentivised to participate if certification was linked to commercial interests such as local council planning applications for new stores. Positive support for reputation management and corporate social responsibility strategies of companies committing to the standard, as discussed earlier in the report, were also recommended.

Consumers and some key informants proposed that consumer engagement with the standard could be encouraged by undertaking a clearly communicated consumer-facing awareness campaign.

*Incentives for commercial sector engagement recommended*

*Credible threat of legislation if standard is not adopted recommended*

## **Barriers and Facilitators: Development**

The most significant barrier to the development of the standard anticipated by the majority of key informants across all sectors was that it will be extremely challenging to reach consensus on the definition of 'responsible marketing'. Several key informants also anticipated that it will be challenging to reach consensus on the scope of the standard in terms of which types of marketing will be covered, through which channels and in what way. In order to help mitigate this problem it

was considered essential for the Scottish Government to clearly set out the expectations and key aims for the standard from the start. One key informant from a civil interest group felt it was important that the standard should start ambitiously with as broad a scope of possible, with narrowing of focus if necessary as development progresses.

Key informant discussion on barriers to the development of the standard also tended to focus on the anticipated complexity of developing a standard that would work across the many business models it aims to include. Concerns around the complexity of defining and writing specifications for the many marketing activities the standard might aim to apply to were also raised by one retail key informant. Respondents anticipated that because the standard could not be a 'one size fits all' a series of standards for food and drink manufacturers, supermarkets, small retailers etc. would be required and this raised issues about parity.

In order to facilitate the development of the standard and mitigate some of the anticipated barriers, the majority of key informants considered it critical to get retailers and food and drink manufacturing companies on board from an early stage. Key informants noted that the involvement of professionals with direct experience and expertise in commercial marketing could be very helpful in ensuring the codification of good practice was robust and comprehensive.

In addition, the view that the development process can be expedited by building on existing industry standards and codes that are familiar to and accepted by food and drink manufacturers and retailers was articulated by several key informants. Using the FSA Nutrient Profiling Model as the basis for defining HFSS foods was repeatedly suggested by several key informants as the scheme has wide acceptance, and would avoid unnecessary duplication of effort.

*Challenges in reaching consensus  
on scope of standard and  
definitions anticipated*

*Lack of commercial sector  
engagement/support a threat*

*Building on existing standards  
and codes of practice may  
expedite the process*

## **Barriers and Facilitators: Roll Out**

The most significant potential barrier to the roll-out of the standard anticipated by many key informants was a lack of industry participation and uptake. In addition to the potential reasons for lack of engagement outlined in '**Key factors influencing engagement/support**', it was felt that this was a particular threat if the standard did not have industry credibility. Involving representatives from food and drink companies, retailers and marketers in the development of the standard from an early stage and fostering a sense of ownership among commercial sector key informants were considered key to ensuring credibility. In addition, it was felt that the support of leading companies and industry pioneers would enhance the credibility of the standard and may encourage other companies to participate.



Several key informants highlighted the need to ensure the support and engagement of major supermarkets. Supermarkets were identified as having the most significant influence on food and drink manufacturer practices as they are the primary route to market. For example, they have been key drivers of product re-formulation to meet salt reduction targets. Harnessing the power of supermarkets to encourage manufacturer participation was therefore viewed as a potentially important facilitator to the successful roll-out of the standard.

Consumer groups were identified by a few key informants as having an important influence on consumer attitudes and opinions including demand for a responsible marketing standard. Given the importance of consumer demand to food and drink manufacturers and retailers, consumer groups clearly have a key role to play in encouraging uptake of the standard. It was also suggested that a consumer facing awareness raising campaign may act to drive consumer demand and therefore encourage commercial sector participation.

Costs and additional complexity/administrative burden associated with participation in the standard were identified as barriers for commercial operator engagement. Proactive efforts to reduce these barriers can improve participation rates.

*Critical mass levels of uptake a priority*

*Support of retailers critical*

*Consumer groups have a key role in encouraging uptake*

## Scope of Standard

There was a lot of key informant discussion around the types of marketing that should be covered by the standard. Key informant views on the scope were divided. Some expressed the opinion that the standard should have as broad a scope as possible and should attempt to address all forms of marketing. Others felt that this was too ambitious, and expressed the view that it may be more manageable if the focus was restricted to one or two forms of marketing. Online marketing was considered to be a particularly important but challenging area for the standard to address. Challenges such as its fast-changing nature, user generated content and its global nature were noted.

There was a feeling among a few key informants that the standard should particularly seek to address marketing targeted at children as they are more susceptible to the negative effects than adults.

There was a strong view among most key informants from the not-for-profit sector that the standard should be underpinned by nutrition standards and that brands associated with a defined health nutrition/threshold should be eligible for certification. There was an assumption among consumers that this would be the case. The FSA Nutrient Profiling Model was considered by key informants to be appropriate for this purpose.

*Scope of standard must be clearly defined and communicated*

*FSA Nutrient Profiling Model  
should form the basis of the  
standard*

## Views on Certification Process

There was some key informant discussion around the process of achieving certification, and questions were raised about what form auditing would take. Several commercial sector key informants, particularly retailers, expressed a preference for sample audits as these would be less expensive and time consuming than full audits. Questions were also raised about the consequences of failing an audit, and a few commercial sector key informants wanted to know if there would be sanctions.

It was highlighted that in order to facilitate the auditing process and to ensure fairness, the standard criteria must be objective, and verifiable.

*Clarity and objectivity on good  
practice criteria and indicators*

## Evaluation

One key informant from a public health background praised what he viewed as a pioneering initiative to tackle the problem of obesity. He emphasised the need for both process and impact evaluations of the standard in order to contribute to the international evidence base on the effectiveness of such initiatives. The key informant acknowledged that it would be challenging to evaluate in terms of outcomes such as impact on HFSS food and drink consumption and obesity, and suggested that it may be less challenging initially to measure impact in terms of intermediate outcome measures such as change in marketing spend or on food and drink sales data. An evaluation study comparing Scottish outcome measures with those of a control country was suggested.

*Impact and process evaluation  
recommended*

## Views on Scottish Government Backing

The Scottish Government backing for the standard was generally viewed positively by consumers and most key informants alike. As discussed in '**key factors influencing engagement/support**', there were concerns among a few key informants that there may be a consumer perception that the proposed standard is an example of a 'nanny state' intervention on the part of the Scottish Government. This view was not, however, strongly expressed by consumers, and in fact this type of government-backed initiative was widely supported.

There was some key informant and consumer discussion around the idea that the proposed standard could be viewed as being undertaken for reasons of political gain. In particular, a few key informants and consumers felt that the fact that the standard has a Scottish remit and has no

parallel in the rest of the UK could be perceived as being associated with the SNP Government's desire to assert independence.

Some commercial sector key informants expressed views that MSPs fail to set a good example in terms of healthy eating.

*Scottish Government viewed as a credible backer*

*Some concerns that the initiative could be viewed as a 'nanny state' intervention*

## Views on BSI

BSI and the Kitemark enjoy high levels of recognition and public confidence. There was limited knowledge and understanding of the range of activities and industry sectors that BSI are involved in. Consumers who were familiar with the Kitemark and/or BSI associated it with product safety and expressed trust in the brand. Many key informants also associated BSI with product safety, and were unaware of the organisation's work in other areas.

One key informant from a marketing background discussed the complexity and precision of British Standards, and questioned how a technical standard would capture the 'subjectivity' of marketing. Some key informants commented that they did not associate BSI with marketing expertise. The costs of purchasing BSI standard were a concern for some commercial interest respondents.

Few respondents had good knowledge of BSI's role or areas of expertise. Most respondents were aware of BSI and expressed high levels of trust in the BSI 'brand'

*BSI viewed as a credible and trustworthy*

*BSI brand associated with technical standards, not associated with marketing*

## Other Comments

Some key informants shared views and experiences on building interest and support for good practice and suggested learning from these could encourage stakeholder engagement with the standard. These included sponsorship of an award for 'responsible marketing' at a high profile awards ceremony such as the Scotland Food & Drink Excellence Awards; a phased approach, initially starting with relatively lenient criteria and moving towards stricter criteria over time; an outcome focused framework of best practice which outlines goals but not performance indicators (similar to the 'Investors in People' model).

Concerns were articulated by some key informants and consumers on the risk of 'endorsement creep'. It was considered extremely important to ensure proactively ensure certification of the

marketing activities of a brand did not result in perceptions among consumers that certification in any way endorsed HFSS foods associated with that brand.

## CONCLUSIONS

There was universal recognition that marketing comprises a broad range of activities and that an effective intervention to constrain the effects of marketing should address all of these. Price-based marketing and retail store marketing activities were perceived to be particularly influential. Stakeholders from multiple representative sectors, but particularly consumers felt that food marketing was strongly skewed towards the promotion of HFSS foods and that rebalancing this in favour of more healthful dietary goals was desirable.

There was a recognition across all representative sectors that benchmarking good practice could improve sector level practice creating a 'level playing field'. Some commercial sector key informants expressed views that currently, where best practice was in place, intervention in the form of standard setting was superfluous, but this was not a widely held viewpoint. Notwithstanding, difficulties in fully understanding the concept, consumers were strongly in favour of a standard that might reduce the ambivalence they experienced as a result of exposure to competing cues and information on food purchase and consumption. Key informants from public health backgrounds were also in support of benchmarking good practice and noted the possibility of knowledge gain, as well as change in practice from the development process.

Many key informants expressed concerns about the potential complexity and challenges of writing a 'fit for purpose' standard. Many were sceptical that standard specification would be sufficiently precise and detailed to be effective. Some noted that the involvement of professionals with direct experience and expertise in commercial marketing could be very helpful in ensuring codification of good practice was robust and comprehensive. A number of respondents commented that BSI had a strong reputation in standards but were not aware of BSI having any prior involvement in marketing standards. Many respondents expressed positive support for the Scottish Government as a credible endorser of a responsible marketing standard.

The concept of independence in standard specification and verification was, on the whole, highly valued. There was variance in what stakeholders meant by 'independence', but commonly mentioned criteria were independent of profit motives, based on robust evidence, applied equally across all commercial sectors and validated by external established organisations such as the Food Standards Agency Scotland. Independence in defining scope and parameters such as indicators and thresholds for the standard was frequently mentioned as a critical success factor. Third party audit and certification was also seen as helpful to assuring independence.

Comments on the voluntary nature of the standard noted both the benefits and the challenges. Recognised benefits were lower administrative burdens in interpretation and application than legislation, and more speedy progress in development and launch. Key informants and consumers expressed concerns about compliance if the standard was purely voluntary. Possible reasons for non-compliance were adoption would incur cost and no benefit, particularly for companies where HFSS foods were a core part of their business or there was misalignment with existing standards of good practice (for example the Public Health Responsibility Deal). Some form of binding requirement to comply was frequently mentioned as desirable and some respondents, including the majority of consumer respondents who suggested it was essential.

Comments on anticipated efficacy of the standard in changing standards of practice were mixed, but there was underlying consensus that a mix of strategic and operational factors was critical to success. Key informants with significant prior experience in standards and codes of practice provided particularly rich comment and perspective on this area of discussion. The most commonly cited operational factors were building a critical mass in adoption of the standard and the comprehensiveness of the specifications. The most significant strategic barriers anticipated were insufficient clarity on exactly what good practice was assured by the standard and any implication by association that the standard endorsed the marketing of HFSS foods. Respondents emphasised the importance of a strong communications strategy. The more in-depth discussions on this noted that strategic communications planning needed to simultaneously focus on corporate benefits such as reputational capital, and consumer benefits such as strong branding.

There was general recognition that participation from a broad base of stakeholders was necessary. Many respondents also expressed reservation about the motives, expertise and likely influence of stakeholders. Low levels of trust were apparent but did not appear to be strongly significant barriers to engagement with the process of development. Respondents' views on their and others willingness to be actively involved application and use of the standard once it has been developed are of course dependent on its final scope and detail. Key future evaluation criteria mentioned were robustness, utility and benefits of being associated with the standard.

## APPENDICES

### Appendix 1: Number of key informant interview participants by sector

**Table 1: Number of commercial interest key informants by sector**

<b>Commercial interest</b>	<b>Number</b>
Food service	1
Food and drink manufacturers	3
Trade associations	2
Marketing/PR	3
Retail	2

**Table 2: Number of not for profit key informants by sector**

<b>Not for profit</b>	<b>Number</b>
Civil interest groups	2
Experienced in third party certification (food and drink marketing)	2
Public health policy	3
Scottish economic interest	2

## Appendix 2: Focus group discussions demographic information

**Table 3: Focus group discussions demographic information**

Group number	Demographics*	Number of participants
1	Age 18-34 Social grade C2D Rural location	4 (3 female, 1 male)
2	Age 35+ Social grade BC1 Rural location	4 (2 female, 2 male)
3	Age 18-34 Social grade BC1 Urban location	6 (4 female, 2 male)
4	Age 35+ Social grade C2D Urban location	6 (3 female, 3 male)

\*All groups included a mix of those were main grocery shoppers for their household and those were not



## Appendix 3: Semi-structured discussion guide for interviews with key informants

[Ensure explanation of third party certified standard is at hand and available to respondent throughout the interview.

Note that some questions are only applicable to certain sectors.]

### Background

- Introductions
- Briefly explain the purpose of study

### Questions about respondent

- *Can you tell me some details about your organisation?*
- *Can you tell me some details about your role in the organisation?*

### Questions about third party standards and certification

- *Do you personally have any experience of third party certified standards?*
- *What do you understand to be third party certified standards?*
- *Has the organisation you work for ever participated in any third party certification schemes?*
  - *If yes, ask details. What? For what aim? Current status – active/lapsed and why?*
  - *If yes, ask about the experience of participating. Positives/negatives in understanding and applying for eligibility, using/implementing, impact?*

### Questions about the proposed third party certified standard

[Briefly explain the proposed standard. Clarify that this it is a proposed standard, and the details have yet to be decided/agreed.]

- *From your perspective what criteria would you like to see included in a third party certified standard for responsible marketing? Probe for those criteria considered as priority/unacceptable/needing refinement improvement.*
- *Ask about the value of certification in general?*
  - *Self certification?*
  - *Third party certification?*
- *In your opinion, would your organisation be interested in participating in a third party certified standard for responsible marketing?*
- *In your opinion, would your organisation be interested in supporting/endorsing third party certified standard for responsible marketing?*
- *From your perspective what might be the benefits of a third party certified standard in the food and drink sector/environment?*
- *From your perspective what might be the negative impacts of a third party certified standard for responsible marketing in the food and drink sector/environment?*
- *What do you think might be the benefits of a third party standard for responsible marketing for your own organisation's goals and objectives regarding responsible marketing and advertising of food and drinks?*
- *From your perspective what might be the benefits of a third party certified standard for consumers regarding responsible marketing of food and drinks?*
- *From your perspective what might be the negative impacts of a third party certified standard for consumers regarding responsible marketing of food and drinks?*
- *Do you anticipate any barriers or disincentives to the development of this standard? How could these problems/barriers be avoided/mitigated?*

- *What do you think might help this standard to get off the ground in it's development/early inception? How might this be enhanced?*
- *Is there anything else that we haven't covered that might facilitate/encourage your organisation's support for getting this standard off the ground?*
- *There are usually significant costs associated with applying for and being certified with a TPS standard. Can you comment on this? How much of barriers might it be for your organisation/others etc.? Can it be understood as an 'investment' and if so, what?*

#### **Questions about Scottish Government/BSI**

- *Development and endorsement of a standard necessarily brings together a wide range of stakeholders from public sector, private sector, not-for-profit sector, for example. Can you comment on any past experience of multi-stakeholder collaboration and how this shapes your views and expectations on how this standard might evolve and its likely value, credibility, effectiveness, good practice?*
- *What are your thoughts on the standard being a joint Scottish Government and BSI scheme?*
- *Do you have any experience of working with the Scottish Government or BSI?*
- *Early consumer research we have conducted found fairly high levels of confidence in SG and BSI endorsement. Does this align with your own perspectives or surprise you? Any other comments?*
- *Early consumer research found most consumers' expectations were that endorsement would not only be for good marketing practice but also for foods that were recommended as best for health. Can you comment on this?*

#### **Wrap up questions**

- *Would you be willing and interested in being involved in the development of the standard and its governance/oversight?*
- *Do you have any other comments, or anything you feel we haven't covered?*

[Thank participant for their time and insights]

## Appendix 4: Semi-structured discussion guide for focus group discussions

[Introduce the topic and purpose of the group]

### Food shopping

*I know you all do a bit of food shopping and some of you shop for the who family can you tell me little but about where you shop, how often, who you buy for and what kind of things guide what you buy, how easy do you find it making decisions. What are the challenges?*

### Food marketing

*I'm particularly interested in schemes that improve people's confidence in the claims made in food marketing and how food producers and retailers promote their shops and products, but before we talk about that can I ask you:*

- *What does food marketing mean to you/ what immediately comes to mind? Is it just about advertising or is it more than that?*
- *What are your views on food marketing / how do you feel about it?*
- *Can you give me some good and bad examples/types of food marketing? How do you define what's good and bad? Why?*
- *How would you judge what's good and bad food marketing? Can you give me some examples?*
- *What kind of values/time do you give to food marketing? How useful is it? How believable do you find it? What do you get out of it?*
- *What do you get out of food marketing? Is it simply about product information or are there other benefits?*
- *How easy is it to make sense of food marketing messages? What are the challenges?*
- *What do you think food producers and retailers invest so much time and energy in marketing? Is it to help consumers? If not, then what?*
- *As someone who shops and has to make purchasing decisions is marketing something that should be improved? Why/in what way? Is it something that CAN be improved? Is it something that should be regulated? Why?*

### Marketing case study

*Okay, lets move on a bit and think about some specific examples of food marketing. Here are a few cereal packets we picked off the supermarket shelf, can we go through each and try and make some assessment on how believable the claims made on each are.*

[Explore how consumers process the imagery and messages on each package in turn and how this informs their decisions. Explore spontaneous response to the mock-up third party certification logo on the Weetabix box.]

### Third party certified standard

*What I'd like to do now is look at the proposal to introduce a standard for food marketing in Scotland.*

[Explain the proposed standard.]

- *What do you think of the idea?*
- *How feasible is it? How do you think consumers would respond? How would food producers respond? Why?*
- *How credible/ trustworthy would you find it?*

[Explore response to the separate components of the mock-up logo in turn and how these different features affect credibility:

- 'No marketing hype' wording

- 'Health Information you can trust' wording
- Healthier Scotland logo
- Kite mark logo]

[Offer the opportunity to voice any other comments/views.

Thank participants for their time and insights]