

19-21 Broad Street | St Helier
Jersey | JE2 3RR

JCRA
2nd Floor Salisbury House
1 – 9 Union Street,
St Helier
JE2 3RF

20 June 2023

Dear JCRA colleagues,

Public Health Response to the JCRA Groceries Market Study, June 2023

Public Health Jersey welcomes the opportunity to comment on the Groceries Market Study report consultation published on the 6th of June 2023.

The following sets out the views of Public Health Jersey to key recommendations of the Groceries Market Study. Ultimately, our aim is to support all Islanders to be better able to afford and access healthier more nutritious, delicious, and sustainable foods to improve their diet and health.

1. Do respondents support the draft recommendation for improved price transparency in the groceries market (enhancing the Jersey Consumer Council's price comparison service)? Local public health research suggests that affordability is a key consideration for Islanders in making dietary choices. Public Health Jersey would strongly support improving price transparency on produce, so Islanders can more easily identify affordable healthy, nutritious options for their diet. This includes removing barriers for smaller scale enterprises, such as farm shops selling fresh local produce, so that these producers can promote their prices and on-island food production.

However, we suggest that the price comparison service is accompanied by more information on the nutritional content of products so Islanders are alerted when food products contain high levels of sugar, salt and fat. which have a detrimental impact on their health. In addition, the service may benefit from an extended range of healthier goods for comparison. Public Health Jersey would be able to support and advise if this approach were adopted.

2. On draft recommendation 2 and the market dynamic, do respondents agree that, where possible, entry barriers should be minimised to enable market entry and that Jersey should be a testbed for innovation?

Public Health Jersey would support reducing entry barriers for any businesses producing and selling affordable healthy and nutritious, and where possible local, food (i.e., whole foods).

Improving routes to markets for local food producers could sustain local production. Innovation to support this approach would also be welcomed, for example by considering adopting new approaches for dynamic procurement which allow different producers to share common sales platforms. Such approaches are showing promise in other places and might allow several businesses to work together to access and obtain larger contracts, for example for larger-scale catering or other Government contracts. This approach could also lead to greater competition leading to a wider range of more affordable food products.

Improved access to food outlets might also be beneficial and addressed through changes in opening hours and increases to the number of food outlets, for example extending the range of community grocery and farmer markets. Another opportunity is to build on the role of Jersey market retailers, including the central market who already offer a range of healthy local food products. Ensuring these markets have convenient opening times and locations is also important.

Whilst supporting improved access to an increased breadth of locally grown and produced whole foods is important, we recognise that a significant proportion of foods in the local market will be sourced off Island. We would therefore also support entry to lower price operators that focus on providing Islanders with healthier, nutritious foods.

3. The Authority would also welcome views on any other matter relating to the draft report and the draft findings, including views on who is best placed to help implement each of the options for recommendations

Public Health Jersey wishes to provide a summary of the local evidence on the impact of diet and accessibility of good quality nutritious food on the health and wellbeing of Islanders. This informs the rationale for responses outlined under 1 and 2 above. In addition, we have provided in the appendix a summary of views received by the public which underpins our aim to improve the affordability and accessibility of healthier, nutritious foods for all Islanders, supporting them in improving their own health and wellbeing.

The [Obesity, Diet and Physical Activity Report 2021](#), shows that nearly all adults (90%) agreed healthy eating was important to them. Recent consultation for the public health strategy confirmed this. Islanders also commenting on the relative affordability and wide availability of unhealthy options and challenges in obtaining healthy foods, due to relatively higher price and less availability. Competition regulation should therefore be used to improve access to affordable, healthy nutritious foods that are sustainably produced. The JCRA could also consider how it could use competition to reduce the availability of unhealthy foods – in particular highly processed foods high in salt fat and sugar – which harm health and therefore Jersey's long-term prosperity and wellbeing.

Along with smoking, eating a high-quality diet rich in whole foods – fruit, vegetables, whole grains, bean, pulses and unprocessed fish and meat – is the single biggest thing any of us can do to protect our long-term health. Unfortunately, most of us do not manage to eat a healthy diet. For example, roughly two thirds of adults in Jersey (69%) eat fewer than the recommended five portions of fruit and vegetables a day. The proportion of children and young people eating 5-a-day decreases with age, from 38% (in Year 4) to 18% (by Year 12).

We also know there are significant inequalities in diet in Jersey, linked to socio-economic status. Islanders with lower incomes (whether adults or children) typically have worse diets. This is consistent with international trends and, over time, contributes to the greater burden of ill health seen among those with fewer resources. Interventions which increase the availability of healthy foods, and/or reduce their price are likely to lead to improvements in diet across the population and will benefit those with fewer resources.

The opposite of a healthy diet is an unhealthy diet with lots of highly processed foods high in fat, salt and sugar, and with only small amounts of healthy foods such as fresh fruit, and vegetables. These diets are a huge risk to long-term health, causing heart disease, obesity, type 2 diabetes, and some cancers. Heart disease and cancer are the biggest causes of death in Jersey and four of the top five causes of ill health on the Island are diet related. About a fifth of children and young people eat foods high in fat, salt and sugar every day, with approximately 45% of Year 10 and 12 pupils doing so most days.

In 2021, only roughly half (47%) of all adults reported a healthy weight, with a third (32%) reporting overweight and 18% obese (noting self-reported rates tend to underestimate obesity). In the same way that poor diet harms health, raised Body Mass Index (BMI) is a major risk factor for noncommunicable diseases such as heart disease, type 2 diabetes and cancers.

We have strong evidence to show that Islanders want to see Government and other key partners help make the change towards a healthier food environment in Jersey. As set out in the Appendix below, Islanders report finding it difficult to eat healthy, good quality, affordable food as part of their daily diet, and this is negatively impacting their overall health and wellbeing. Public Health Jersey would support and embrace any opportunities to partner with the JCRA to address these challenging and urgent priorities.

Appendix – findings from Public Health’s Big Conversation and follow-up focus groups

In Autumn 2022, Public Health Jersey undertook the ‘Big Health and Wellbeing Conversation’, a consultation event to understand how Islanders perceive their health, and how they think the Government of Jersey can help to improve their health and wellbeing. The findings of the consultation are set out in the Director of Public Health’s Annual Report (2022).

Having an unbalanced diet with too much junk food and not enough healthy food was identified in the Conversation as negatively impact Islanders wellbeing. Many stated they could not afford healthy food, so instead turn to more accessible and cheaper alternatives, often unhealthy, processed, junk and fast-food options, despite knowing the health implications. This is a common factor for many Islanders, but it is exacerbated among those struggling financially.

Islanders are aware of the importance of consuming healthy foods such as fruit and vegetables but need to prioritise their time and money for other important necessities such

as working, paying the bills, and housing, often resulting in them consuming more unhealthy food.

Following the Big Conversation, focus groups were held to build on these findings and help inform the refresh of Jersey's Food and Nutrition Strategy. These were group discussions including participants from across the social spectrum, with representation from ethnic minority groups and low-income households. The groups discussed strategies that can support healthy food systems, advocating for more support to farmers and to incentivise agriculture in Jersey.

Subsidies and price caps for healthy foods and increasing regulations on supermarkets were some of the policies that the groups suggested for Government to adopt. Equally, restrictions on promotion of unhealthy foods in retail environments and a ban on advertisements of unhealthy foods were some of the actions that Government could employ, according to some of the participants.¹

These findings were also reflected in the Rural Economy Framework Public Consultation Research Project carried out in 2020, which sought to gain Islanders' views on our local food system and the extent to which our community wishes to support local production/consumption and protect Jersey's rural economy and countryside, with 82% of Islanders calling for greater support for local produce, farms and farmers.²

Yours sincerely

On behalf of Public Health Jersey

publichealth@gov.je

¹ [Food and Nutrition Discussion Groups Report](#)

² [Rural Economic Framework.pdf \(gov.je\)](#)