

Loyalty pricing in the groceries sector

Summary

27 November 2024



© Crown copyright 2024

You may reuse this information (not including logos) free of charge in any format or medium, under the terms of the Open Government Licence.

To view this licence, visit www.nationalarchives.gov.uk/doc/open-government-licence/ or write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or email: psi@nationalarchives.gsi.gov.uk

Loyalty pricing in the Groceries Sector - Summary

1. Loyalty pricing – where shoppers get a discount on products if they are a member of a loyalty scheme – is now part of everyday life when grocery shopping. Tesco and Sainsburys, the two largest grocery retailers¹ offer thousands of products on a loyalty price promotion each week. Morrisons, Co-op, Waitrose, and, most recently, Lidl also offer discounted prices to members. Total revenue from the sale of loyalty priced grocery products for November 2023 to January 2024 stood at over £5 billion² (equating to approximately 22% of total grocery revenues for the supermarkets who offer loyalty price promotions).³ The number of loyalty prices has continued to grow at most of these supermarkets during 2024.
2. When searching for good deals, and often faced with a vast array of offers, many people say they don't trust that supermarket loyalty discounts are as good as they seem. Consumer groups and media coverage have raised concerns that loyalty price savings may not be genuine or that some groups of shoppers may be unfairly excluded from accessing loyalty prices.
3. As part of the CMA's response to the rising cost of living and our programme of work in the groceries sector, we have conducted a rigorous investigation into supermarket loyalty pricing.
4. This has included examining pricing data for around 50,000 grocery products that were on a loyalty price promotion to check whether offers are genuine, and consumers are being treated fairly. To understand how shoppers feel about loyalty pricing, we commissioned a wide ranging nationally representative survey. We also examined a sample of 429 branded products on a loyalty promotion to see how loyalty prices compare to prices charged at other retailers for the same product. In addition, we assessed whether supermarkets' data collection policies, and their approach to which shoppers can join their loyalty schemes and access loyalty prices, are fair under consumer law.

¹ Tesco and Sainsbury's have a combined groceries market share of 43.4%. 12 weeks ending 03.11.2024. [Grocery Market Share - Kantar \(kantarworldpanel.com\)](https://www.kantarworldpanel.com)

² This figure for supermarkets' revenues from sales of products subject to loyalty promotions is based on the supermarkets' aggregated responses to our requests for information.

³ This figure for supermarkets' revenues from sales of products subject to loyalty promotions is based on the supermarkets' aggregated responses to our requests for information. The 22% figure is an average for the five supermarkets - the percentage varies across the supermarkets.

5. Our key findings include:
- **97% of shoppers are a member of at least one supermarket loyalty scheme**, and on average shoppers are members of 3 supermarket loyalty schemes.
 - Despite widespread participation in supermarket loyalty schemes, our consumer survey found that **43% of shoppers consider it unfair that loyalty scheme members pay lower prices for some products than non-members**
 - The **average saving on products with loyalty pricing for loyalty scheme members ranged from 17% - 25% across the five supermarkets we examined.**
 - **Most shoppers (69%) think loyalty pricing offers good savings.** However, a significant proportion (40%) say they do not trust loyalty prices are a genuine saving on the usual price. Strikingly, **over half of shoppers (55%) think that the price for non-members during loyalty promotions is higher than the usual selling price.**
 - However, **the overwhelming majority (92%) of around 50,000 products on a loyalty dual price promotion⁴ we analysed offer genuine savings on the usual price of the product at that retailer.** We found very limited evidence of price changes which could indicate that supermarkets may have inflated prices to make their loyalty prices appear misleadingly attractive. Our findings should provide reassurance to shoppers: in the majority of cases those without a loyalty scheme membership are paying the same price during a loyalty promotion as they do in the weeks both before and after it.
 - Our analysis shows **loyalty prices are generally the same price or cheaper than the cheapest price available for that product at other supermarkets.** But this is not always the case: 61 of the 429 products with a loyalty price we examined were available at a lower price at other supermarkets. **Consumers should continue to shop around to find the best deals, even when supermarkets are promoting a loyalty discount.**

⁴ This is where supermarkets offer a single product for sale at two prices: a lower price exclusively available to their loyalty scheme members, and a higher price for shoppers who are not loyalty scheme members.

- **Concerns about their personal data are not preventing many shoppers from joining or using loyalty schemes**, including to access loyalty prices.
- Only 7% of those surveyed who are not members of any supermarket loyalty scheme where they regularly shop for groceries, said this was due to personal data concerns
- We have **not seen evidence of consumer law concerns in relation to supermarkets' collection and use of personal data.**
- **Some supermarkets could do more to ensure certain groups of shoppers**, such as those without a smartphone or who are under 18, **can access - or know how they can access - loyalty prices.**

6. This summary sets out:

- Why the CMA has carried out a review of loyalty pricing in the grocery sector
- How we gathered evidence
- The key findings from our review

Why the CMA has carried out a review of loyalty pricing in the grocery sector

7. In recent years, consumers have faced significant grocery price inflation. In March 2023, aggregate food price inflation stood at 19.1%, putting considerable pressure on many households' budgets.⁵ While grocery inflation has fallen consistently since then, the level of food prices remains substantially elevated relative to average earnings, with the average person paying out a higher proportion of their income for the same basket of groceries than a few years ago.⁶
8. Against the backdrop of sustained cost of living pressures, the CMA has undertaken a comprehensive programme of work to ensure that consumers can be confident they are getting good deals and being treated fairly.

⁵ [Food and energy price inflation, UK - Office for National Statistics](#)

⁶ For example, in May 2024 whole economy average earnings (source: [ONS](#)) were 15.0% higher than in January 2022, whereas food prices (source: [ONS](#)) were 25.4% higher.



CMA work in groceries sector

As part of our programme of work in the groceries sector, in 2023 we assessed retail competition and profitability. We did not find widespread evidence of weak competition: for example, profit margins were historically low and the lowest-price retailers were gaining market share from others.⁷ We provided a further update in July 2024. Again, overall, this did not find evidence that groceries inflation was being driven at an aggregate level by weak competition between retailers.

In addition to this, we have scrutinised grocery retailers' pricing practices, inspecting whether grocery retailers - large and small – are providing shoppers with key price information. In 2023 we assessed whether retailers are following the rules on unit pricing. We called out examples of poor practice, particularly among some variety stores, and wrote to certain retailers telling them to take action. Some of the problems we found stemmed from the legislation itself (the Price Marking Order 2004), which allows unhelpful inconsistencies in retailers' practices and leaves too much scope for interpretation. So, we called on the government to change the rules to help ensure shoppers get the information they need.⁸ The reforms to the unit pricing legislation were recently laid before Parliament and are set to come into force in October 2025.

Following our store inspections, we've also highlighted failings where some, often smaller, grocery retailers have not been consistently providing shoppers with accurate prices, and we produced materials to raise awareness and drive compliance among retailers.⁹



⁷ [Competition, choice and rising prices in groceries - GOV.UK](#)

⁸ [Unit pricing - GOV.UK](#)

⁹ [Review of price marking in the groceries sector - GOV.UK](#)

9. With loyalty prices becoming prevalent in the grocery sector, and questions being raised by stakeholders and consumers about whether they are genuine and fair, in January we began a review into loyalty pricing. Our key objectives were:

- to assess whether grocery retailers' promotions are fair under consumer law and to take enforcement action if we find problems
- to provide advice to grocery retailers to help them understand what consumer law requires when offering loyalty price promotions
- to understand how shoppers feel about loyalty pricing and how it is impacting their shopping behaviour.

What is loyalty pricing?

10. Loyalty pricing, also sometimes referred to as 'member pricing' or 'dual pricing', is a form of promotion where a retailer makes a product available at two prices simultaneously - a cheaper price for shoppers who are members of their loyalty scheme, and a higher price for those who are not members.

Examples of how supermarkets display loyalty prices in store



11. Tesco introduced Clubcard Prices in September 2020. Since then, Sainsbury's, Waitrose, Morrisons, Co-op, and, most recently, Lidl, have been making some price promotions available only to shoppers signed up to their loyalty schemes.

12. Loyalty pricing takes different forms, including:
- **Loyalty dual price promotions** - where supermarkets offer a single product for sale at two prices: a lower price for their loyalty scheme members, and a higher price for shoppers who are not loyalty scheme members.
 - **Loyalty bundle promotions** - where there is a loyalty offer when members buy a number of different items together. This could be a combination of items from a range of different products. For example, 'buy any 2 packs of frozen vegetables for £2'.
 - **Loyalty multibuy promotions** - where there is a loyalty offer available when members buy a certain number of the same item, such as 'buy 3 chocolate bars for the price of 2'.

How we gathered evidence

13. To inform the review we have gathered evidence and information from a range of sources, including:
- information from Tesco, Sainsbury's, Waitrose, Co-op and Morrisons ('the five supermarkets'¹⁰) on their loyalty pricing, including a year of daily pricing data for around 50,000 grocery products that were on a loyalty price promotion either in August or November of 2023.
 - information from the 5 supermarkets about their loyalty schemes and the data they collect about shoppers.
 - supermarkets' websites, privacy policies, public statements and annual reports, and market reports on loyalty pricing.
 - a nationally representative consumer survey, carried out by the National Centre for Social Research (NatCen) on our behalf, gathering responses from 2,439 grocery shoppers, 2,313 of whom were loyalty scheme members.
 - consumer comments on loyalty pricing and publicly available consumer research and media coverage relating to loyalty pricing.

¹⁰ These supermarkets were the primary focus of our review because they were the ones that offered loyalty pricing at the point we opened our review in early 2024.

- a sample of 429 branded products on a loyalty promotion at one or more of Tesco, Sainsbury's, Morrisons and Co-op. We then collected price data for up to six other supermarkets (Asda, Co-op, Morrisons, Ocado, Sainsburys, Tesco and Waitrose) if they also sold the identical branded products, to compare the prices.¹¹
14. We have engaged with a range of stakeholders during our review, including supermarkets, other regulators, and consumer representative organisations. We welcome the constructive approach adopted by all of them towards our review.
 15. We have carefully considered all information when coming to our conclusions. This report sets out our views on the loyalty pricing practices we have seen and how retailers can stay on the right side of consumer law when offering loyalty price promotions.¹²

Overview of findings

There is widespread participation in supermarket loyalty schemes, with 97% of shoppers being a member of at least one loyalty scheme

16. Our consumer survey revealed widespread participation in supermarket loyalty schemes, with 97% of UK shoppers being members of at least one loyalty scheme and shoppers on average having 3 memberships. Notably, 1 in 5 (21%) have memberships of five or more supermarket loyalty schemes.
17. Tesco Clubcard is the loyalty scheme with the most members, with 77% of regular grocery shoppers in our survey saying they are signed up to this loyalty scheme, followed by Sainsbury's Nectar Card, with 57%.

The average loyalty price saving for members ranged from 17% to 25% across the five supermarkets

18. Our analysis found that the **average loyalty price saving for members on products with a loyalty price promotion ranged from 17% to 25%** across the five supermarkets.

¹¹ We did not include the two large discount supermarkets, Aldi and Lidl, in our comparative analysis as neither supermarket retails online nor stocks a wide enough range of branded products to enable sufficient like-for-like comparisons with the branded products in our sample.

¹² Including in circumstances where loyalty price promotions interact with other forms of promotion

19. We found branded products make up the majority (58-90%) of products on a loyalty price promotion across all five retailers. The average length of a loyalty dual price promotion was between 17 and 26 days.
20. Our comparisons of prices across supermarkets indicates that the loyalty price savings for members tend to be similar to the savings from was/now offers available to all shoppers.

Loyalty pricing is only one factor that influences whether people join loyalty schemes

21. 27% of shoppers say they have joined a supermarket loyalty scheme in the last 12 months. Among those who have signed up to a scheme during this period, wanting to access loyalty prices was a primary motivation for 27% in their decision to join.
22. From our consumer survey, the loyalty schemes with the highest proportion of new joiners in the last year were Lidl Plus and Asda Rewards - at 30% and 27%, respectively. In part this is likely to reflect the fact these are two of the newest supermarket loyalty schemes.
23. It is noteworthy that Asda do not offer loyalty price promotions and Lidl only introduced them for a limited range of products earlier this year.¹³ These findings suggest that loyalty pricing is not the only driver of new membership growth. A range of factors, such as other loyalty scheme benefits and people changing how much they shop at certain supermarkets, are also prompting shoppers to sign up to loyalty schemes.
24. Despite widespread participation in supermarket loyalty schemes, our consumer survey found that a significant proportion of shoppers – 43% - consider it unfair that loyalty scheme members pay lower prices for some products than non-members.

While 60% of shoppers trust that loyalty prices provide savings on the usual price, 55% think the price for non-members during a loyalty promotion is generally inflated

25. Our consumer survey found that the majority of shoppers (69%) think that loyalty pricing offers good savings for members. Moreover, loyalty pricing is a popular form of promotion. Over a quarter (26%) consider loyalty price

¹³ The disparity in recent membership growth between schemes may reflect their relative longevity. For example, Tesco and Sainsbury's, the two supermarkets with the largest loyalty schemes in the UK, may have a more saturated membership base.

promotions as the most likely amongst common promotions to increase the likelihood they will shop at a particular supermarket.

26. However, our survey also found that 40% of respondents do not trust that the loyalty price charged to members during a loyalty promotion is a genuine saving on the *usual price* for that product, while 60% do. In line with concerns raised by Which? and in the media, our survey found many people are sceptical about the price for non-members. Strikingly, over half (55%) of people in our survey said they think that non-member prices during a loyalty price promotion are generally higher than the price usually charged for the product. This view is particularly common among younger people, with, for example, 71% of those aged 18-29 thinking that the price for shoppers who aren't members has been inflated.

The overwhelming majority of around 50,000 products on a loyalty promotion we analysed offered genuine savings on the “usual” price at that supermarket.

27. Supermarkets, like all traders, must ensure that any price advantage claimed with a promotion is not misleading under consumer law. If supermarkets choose to use loyalty prices, or another form of reference pricing, any comparison between the non-loyalty price / reference price and the discounted price must reflect a genuine price advantage or saving. If not, they are liable to mislead consumers and to break the law.
28. As part of our review we have assessed whether loyalty price promotions are genuine promotions and comply with consumer law. To do this we have carried out a detailed price analysis of grocery products subject to loyalty pricing. We set out the findings from this analysis in chapter 7. In summary:
- The overwhelming majority of around 50,000 products we analysed did not have a pricing pattern that suggests the promotion may mislead shoppers about the savings it offers on the “usual” price.
 - For example, for 92% of the products on a loyalty dual price promotion that we assessed, the non-member price *during* the loyalty promotion was the same (or cheaper) than the price charged to all shoppers during the 28 days *before* the loyalty promotion.
 - We identified a very small number - just 0.6% of the 50,000 loyalty dual price promotions - with a pricing pattern where the non-member price during the loyalty promotion was higher than the price for all shoppers *before and after* the promotion. This pricing pattern *could* suggest that the “usual” price for the product may have been inflated during the loyalty price promotion. However, when we examined these offers in further

detail, we found that many might be explained by the existence of other promotions in the days around the loyalty price promotion.

- Similarly, our analysis of loyalty bundle promotions found limited cause for concern. The vast majority of products on these promotions were not subject to a price increase in the lead up to, or during the first few weeks of, a bundle promotion. Moreover, further analysis showed that the small number of products with price increases were spread across different bundle promotions. Given the small proportion of potentially problematic price movements, and the inflationary context of the period, we consider it unlikely that these price increases are a reason for concern.

29. In summary, the number of potentially concerning loyalty price promotions made up a very small proportion of the overall number of offers – they do not represent a systemic problem or suggest retailers are trying to mislead shoppers.
30. Today we have written to all supermarkets that use loyalty pricing to advise them to review their practices in line with our advice and, where necessary, take action to ensure **all** of their promotions comply with consumer law. This includes when they alternate between loyalty promotions and other forms of promotions such as was/now promotions.
31. **More generally, we advise all grocery retailers offering - or considering introducing - loyalty price promotions to read chapter 6 of this report. In this chapter we set out the CMA's view on how to stay on the right side of the law when offering this form of promotion, and make sure none of their promotions have the potential to mislead shoppers.**
32. Our findings should provide reassurance to shoppers. In the majority of cases these promotions appear to offer genuine savings, and those without a loyalty scheme membership are paying the same price during a loyalty promotion as they do in the weeks both before and after it.

Our comparative analysis revealed loyalty prices are generally the same price or cheaper than the cheapest price available for that product at other supermarkets

33. Consumer law does not require that retailers make loyalty prices cheaper than the price charged by other retailers for that same product. Nor does it require non-loyalty prices for products on a loyalty price promotion to be similar to the prices charged by other retailers. As long as they don't mislead people, supermarkets are free to set their prices how they choose, and the CMA's

recent reports on competition and profitability in the groceries sector have shown that competition between them is generally working well.

34. Even so, we think it can still be valuable for shoppers to know whether loyalty prices are typically cheaper than other retailers' prices.
35. Our comparative analysis indicates that **loyalty prices are generally the same price or cheaper than the cheapest price available for that product at other supermarkets. For most of the products in our sample a loyalty price was either the cheapest price available (for 154 products) or the equal cheapest price available (for 214 products) across the retailers.**
36. For most of the products where the cheapest price was charged by multiple stores, the product was also on promotion at those other stores - either another loyalty price promotion (24 products) or a 'was/now' promotion (128 products). For 60 products the equal cheapest price included a non-promotional price as well as a loyalty price.
37. However, **we also found several loyalty priced products in our sample which were more expensive than the cheapest price available at other retailers at that time. For 61 products (14%), the cheapest price across the retailers did not include a loyalty price.** While the cheapest prices for these products were generally was/now promotions, for 20 products a non-promotional price was either the cheapest price, or the equal cheapest alongside a was/now promotional price.
38. The findings in relation to these 61 products support the view that **shoppers should not assume a loyalty price is always the lowest price a product is available for and it's worth shopping around.**

Some branded products are sold in different pack sizes at different retailers - shoppers may not spot these differences when comparing prices

39. Whilst our comparative price analysis demonstrates there can be value in shopping around, it also revealed a challenge for shoppers when comparing prices across supermarkets. We found that for several loyalty priced products in our sample, there were differences in the pack sizes that were available at different supermarkets, with these differences sometimes being quite small and potentially difficult to spot.
40. We think this could make it difficult for shoppers to make accurate like-for-like price comparisons on such branded products across retailers.

The extent of promotional activity on some products may make it harder for shoppers to have meaningful anchor prices

41. Our comparative analysis has also highlighted many examples of the same branded products being on promotion simultaneously at different retailers. For example, **343 (80%) of the branded products in our sample were also on a promotion in at least one other retailer, and in most cases, they were on promotion in multiple other retailers.**
42. Moreover, our analysis of the supermarket data has shown some of the supermarkets have frequent loyalty price promotions on certain products across the year.
43. The extent of promotional activity we have seen during our analysis on the same product - both at individual supermarkets and across different supermarkets - can make it challenging for shoppers to know what a meaningful anchor (or “usual”) price is for products, particularly during a period of inflation when prices are increasing. This in turn can make it difficult for shoppers to assess whether:
 - loyalty prices represent genuine savings; and
 - whether the price charged to non-members during a loyalty price promotion is the “usual” price.
44. The scale of promotional activity on certain items across supermarkets may be a factor that underpins some of the scepticism shoppers appear to have towards loyalty prices, and particularly whether non-loyalty prices are “usual” selling.

Some supermarkets could do more to help some shoppers access loyalty prices

45. We examined the eligibility criteria of loyalty schemes for supermarkets that have loyalty price promotions. Eligibility requirements across schemes include minimum age requirements, or the need to have a UK residency, UK address, or smartphone to access some or all of a scheme’s benefits.
46. The supermarkets’ eligibility requirements are unlikely, in our view, to breach consumer law. However, some supermarkets could do more to allow a wider range of people to access loyalty prices or to ensure their customers know how they can join schemes in some circumstances. For example, we found that shoppers who are under 18 or without a smartphone are restricted from accessing loyalty prices at some supermarkets. Supermarkets could improve access to loyalty schemes in a number of ways, such as:

- where they don't do so already, introduce provisions that allow under-18s to access schemes (or certain aspects of those schemes where legal considerations do not preclude that). For example, through a parent or guardian or by introducing a form of junior membership.
- enable customers both to join and access their membership schemes offline, such as being able to seek assistance in registration e.g. in store or through a telephone contact centre, as well as the option to request a physical card to access loyalty prices when they shop.
- eliminate the need for an email address when using an offline registration method where this is currently a requirement.
- make clearer to customers that they don't need to provide a fixed address to join their loyalty schemes.

While some shoppers have concerns about sharing their data, these are not preventing the overwhelming majority from using supermarket loyalty schemes and accessing loyalty prices

47. Most shoppers say they are aware that supermarkets collect their data when they use loyalty schemes. For example, our survey found that nearly three quarters (72%) of shoppers, when asked to think back to when they had most recently signed up for a loyalty scheme, were aware that supermarkets would be collecting personal data each time they shop.
48. Our survey found that shoppers are relatively comfortable with sharing their data when it remains within that supermarket. For example, 61% feel comfortable about supermarkets using the information they collect on them through their loyalty scheme to send them personalised offers.
49. However, fewer people feel comfortable about supermarkets sharing their data with other companies. For example, only 32% feel comfortable with supermarkets sharing their anonymised data with other companies so they can understand shopping habits in general. Even fewer - just 17% - are comfortable with supermarkets sharing their individual data so other companies can send them personalised promotions.
50. Concerns about their data being collected, used and shared are not preventing many shoppers from joining or using supermarket loyalty schemes, including to access loyalty prices. Only 7% of those surveyed who are not members of any loyalty scheme where they regularly shop for groceries, said this was due to personal data concerns. This suggests that while many shoppers have some reservations about their personal data being shared,

many are willing to exchange some degree of privacy for the perceived benefits that loyalty schemes offer.

We have not seen evidence of consumer law concerns in relation to supermarkets' collection and use of personal data

51. We reviewed supermarkets' privacy policies and considered these against supermarket responses to questions we asked on their data collection and use practices. (We set out our findings in chapter 5.) In our view, the information provided by supermarkets to consumers is likely to give shoppers a reasonable understanding of what is being done with their data. For example, the supermarkets outline the types of personal data they collect, such as purchase history and preferences, and explain how this data is used.
52. Supermarkets disclose their data sharing practices in general terms. They do not always, for example, explicitly disclose the identity of every third party that they may share data with. Although they adopt a high-level approach to disclosing their data-sharing partnerships, they appear to give shoppers adequate information about their practices, and we think are unlikely to be in breach of consumer law.

Loyalty pricing is prompting some shoppers to use loyalty schemes more, but supermarkets without loyalty pricing have also seen an increase in scheme engagement

53. Our survey found that a minority of shoppers used their loyalty scheme membership more than a year ago, with 27% using their loyalty card or app more at Asda; 21% at Tesco and Lidl; 19% at Morrisons; 18% at Sainsbury's; 14% at Co-op; and 10% at Waitrose.
54. Among those who did increase their use of any of their loyalty schemes compared with 12 months ago, loyalty pricing was the joint most common reason cited for this (26%).¹⁴ However, it is noteworthy that the supermarket with the loyalty scheme with the most shoppers using it more over the past 12 months is Asda, which does not currently offer loyalty pricing at all.

Loyalty pricing is not changing where most people grocery shop

55. According to our survey, **most shoppers (76%) report that loyalty pricing has not changed where they shop over the past 12 months.** This is

¹⁴ Starting to shop at or increasing frequency of shopping at a particular store was also identified as the main or sole motivation by 26% of respondents.

especially pronounced among older shoppers, with 89% of those over 70 reporting no change in where they shop, compared with 65% of 18- to 29-year-olds.

56. Our survey found that people fragment their grocery shop, on average shopping at three supermarkets regularly. Interestingly, our survey found that while 69% of respondents said that loyalty pricing has not affected the extent to which they compare prices across supermarkets compared to 12 months ago, **nearly a quarter (24%) reported that they now compare prices more due to the introduction of loyalty pricing**. Those in financial difficulty in our survey were especially likely to compare prices more than before.
57. In summary, our survey findings do not indicate that loyalty pricing has changed consumer behaviour in such a way that it is weakening competition in the groceries sector.

Our messages to shoppers:

58. Our pricing analysis has found that the overwhelming majority of loyalty price promotions appear to represent genuine savings on the “usual” price at the supermarket running the promotion. Moreover, shoppers without a loyalty scheme membership are generally paying the same price during the loyalty price promotion as they do in the weeks both before and after loyalty price promotions. This review, like our analysis into the drivers of grocery inflation earlier this year,¹⁵ should provide reassurance to shoppers that they are not being treated unfairly by supermarkets.
59. Our comparative price analysis indicates loyalty prices generally do offer shoppers savings when compared with the price of the same product available at other supermarkets when it is not on promotion at the other retailers. But this is not always the case. We found several loyalty priced products which were more expensive than the cheapest price available at other retailers at that time, so there is value in shopping around.

Our messages for supermarkets:

60. Supermarkets should read the advice we provide in chapter 6, to help ensure that their loyalty price promotions are fair and do not mislead shoppers, in particular when they are alternating between loyalty price promotions and other forms of promotion such as was/now promotions.

¹⁵ [Competition and profitability in the groceries sector - GOV.UK](#)

61. They should consider whether they could do more:

- so that certain groups of shoppers, such as those under 18 or without a smartphone, are not prevented from joining their loyalty schemes and accessing the cheaper loyalty prices, and
- to promote the ways some groups of customers, such as those without a fixed address, can access their loyalty scheme and in turn loyalty prices.