

Regulation for **Physical and Digital Grocery Layout** in Abu Dhabi





Introduction

Abu Dhabi is committed to fostering a healthier future for its citizens by reshaping in-store grocery retail and online grocery retail platforms to support informed food choices. Store layouts and online interfaces play a powerful role in shaping consumer behavior, particularly in high-exposure areas of physical retail establishments (store entrances, checkout areas, and aisle ends) and online grocery retail platforms (homepage, checkout, search, and pop-ups section).

This policy establishes a regulatory framework that both restricts the placement of HFSS food and beverage (F&B) products in these zones and encourages the prioritization of healthier alternatives. By addressing the visibility and accessibility of HFSS items across the in-store grocery retail and online grocery retail platforms, the policy responds to the public health challenge of obesity and related non-communicable diseases (NCDs).

Its overarching aim is to transform in-store layouts and online interfaces of grocery retail platforms into environments that promote healthier consumer choices by default.

This policy applies to all major channels through which consumers purchase groceries, including physical supermarket environments and online grocery retail platforms. This policy aims to cover all major channels through which consumers purchase groceries and hence will target both physical supermarket environments and online grocery platforms



1.1

Purpose and objectives

This policy, as part of Abu Dhabi's broader initiatives to tackle obesity and improve public health, establishes a regulatory framework for the placement of HFSS F&B products (kindly refer to section 8 for definition) across in-store grocery retailers and online grocery platforms. It aims to:

- **Reduce obesity prevalence in the Emirate**, where obesity affects 22.8% of adults and 18.1% of children aged 5–17 (2024).
- **Lower the incidence of NCDs** which affect 39.6% of overweight or obese adults aged 18+ (DOH Data Management & Statistics Division, 2024).
- **Enhance public health and economic sustainability** by reducing healthcare costs and improving workforce productivity.
- **Limit visibility and accessibility of HFSS products in high-exposure zones** (in-store and online).
- **Reduce HFSS products consumption**, in alignment with Abu Dhabi's Nutri-Mark program, SEHHI, and international best practices.

1.2

Eligibility

1.2.1 In-store grocery retailers

This policy applies to all physical retail establishments operating within the Emirate of Abu Dhabi (mainland and free zones) that meet the following criteria:

- Have a minimum retail floor area of 4,000 sq. ft or 371.6 sqm., excluding spaces that are: (i) not used for displaying or selling goods (e.g., storage or inventory areas); (ii) primarily used for preparing or selling food for immediate consumption; and (iii) used for customer consultations related to medical services (e.g., pharmacy consultation rooms)
- Sell prepacked food and beverages for direct consumer purchase.

This policy excludes:

- Small grocery/convenience outlets with a retail floor area below 4,000 sq. ft or 371.6 sqm (e.g., local baqalas).
- Specialist retailers who primarily focus on selling one or more types of products (e.g., chocolatiers, ice-cream or sweet shops), provided that such establishments do not sell general grocery items or staple foods.

1.2.2 Online grocery retail platforms

This policy will have applicability to all online grocery retail platforms, operating in the Emirate of Abu Dhabi:

- Online platforms managed by all eligible in-store grocery retail outlets.
- Grocery aggregators and
- In-app grocery services for other delivery platforms.

All eligible in-store grocery retailers and online grocery retail platforms as per this policy are required to comply with the policy scope and requirements below, as a condition of operating within the Emirate of Abu Dhabi.

This policy excludes:

- Online platforms that exclusively sell or deliver non-grocery items (e.g., electronics, fashion, household goods).
- Restaurant delivery sections within multi-category or aggregator applications, which are limited to the sale and delivery of prepared meals and beverages, and not to retail grocery or packaged food items.
- Specialist retailers' online platforms that primarily sell one or more types of HFSS products (e.g., chocolatiers, ice-cream or sweet shops), provided that such establishments do not sell general grocery items or staple foods.



1.3

Scope

1.3.1 In-store grocery retailers

The policy applies to the internal layout and placement of products within eligible stores, focusing on high-exposure zones within the store layout, including

- **Store entrances:** All floor space within the prohibited distance (as specified in the matrix below) of an in-store grocery retail's main entrance(s), including any promotional display areas in the front foyer or just outside the entry:

In-store grocery retail floor area (m ²)	Prohibited distance from entrance (m)
371.6 m ²	3.3 m
464.5 m ²	3.7 m
557.4 m ²	4.1 m
650.3 m ²	4.4 m
743.2 m ²	4.7 m
836.1 m ²	5.0 m
929 m ² and above	5.3 m

Table 1: Prohibited entrance areas, as a measure of relevant floor area (kindly refer to **Section 6. References, reference number 12** for more details)

- **Checkout areas:** All cashier or payment locations, including both human-operated & self-checkout, and any racks or shelves adjacent to or within 2 meters of a checkout counter or queue line.
- **End-of-aisle displays:** The shelf space or display fixtures at both ends of aisles, including any display located within 50cm of the aisle end.

1.3.2 Online grocery retail platforms

This policy applies to the platforms' high exposure zones such as homepage, checkout, pop-ups, and search pages. (Refer definitions)

2

Policy requirements

The policy will be implemented with the following requirements:

2.1 In-store grocery retail products placement

Retailers must arrange store layouts to avoid undue visibility and easy access to HFSS products in high exposure zones, as follows:

- Retailers shall ensure that all food and beverage products placed in high-exposure zones are graded in accordance with the Nutri-Mark system (store entrances, checkout areas within 2m, and aisle ends) to ensure that high-exposure zones do not include HFSS F&B products, graded as “C”, “D” or “E” (e.g., sweet confectionery, sugary drinks, sweet bakery items, sugary cereals).
- Retailers are not required to apply supplementary front-of-pack Nutri-Mark labels on products located in these areas.
- Retailers are encouraged to use high-exposure zones to promote healthier alternatives (e.g., fresh fruit & vegetable baskets, plain or lightly salted nuts, wholegrain crackers, water).
- All eligible retailers shall ensure the availability of the Nutri-Mark score evidence (A–E) for all food and beverage products placed in high-traffic zones, to facilitate product inspection and verification.
- If the retailer has insufficient information to establish a product’s Nutri-mark score, the retailer shall assume the product is

non-compliant for the purposes of this policy.

- In cases where nutritional labeling is not displayed on certain products, retailers shall ensure that the relevant nutritional information is readily accessible and can be provided upon request during inspection.

2.2 Online grocery retail platforms (Figure 5.4)

For all eligible online retail platforms (as defined in section 1.3.2. Online grocery retail platforms) HFSS items must not be offered for sale across the following sections:

- [Homepage \(including browsing and favorites\) Figure 5.4](#)
 - a) HFSS items must not be offered for sale on the entire homepage (whether or not the consumer enters the online marketplace via the home page).
 - b) HFSS items must not be offered on a favourite products page, unless previously intentionally marked as favourites by the consumer, and must not be given greater prominence than other products.
- [Search Section Figure 5.4](#)
 - a) HFSS products must not be displayed as default results in the search section (e.g., when the consumer clicks into the search bar without typing anything).
 - b) HFSS products must not appear in search results when the consumer is browsing or searching for non-HFSS products (e.g., when searching for non-HFSS items, products like chocolate or chips must not be displayed).
 - c) HFSS products shall not appear in search results unless the consumer explicitly types the full name of that

product (e.g., only when typing “chocolate” will chocolate products appear, while partial entries such as “cho” shall not trigger such results).

➤ **Checkout Section Figure 5.4**

a) HFSS items must not be given prominence in checkout pages (basket, payment, delivery steps). This includes cross-selling, last-minute recommendations, or bundle prompts suggesting the addition of HFSS products (e.g., “add chocolate bar for AED 5” or “upgrade your order with chips”).

➤ **Pop-ups Section Figure 5.4**

a) HFSS products must not be displayed within pop-up elements that appear automatically or intrusively within a page, where the consumer has not intentionally opened the content and is required to act (e.g., close or skip) to continue browsing.

b) HFSS products must not be offered during search and the checkout process in pop-up format which are visual elements that appear suddenly and intrusively within a page, requiring the user to act (e.g., close or dismiss) to continue navigating.

Online grocery retail platforms must avoid undue visibility and easy access to HFSS products in high exposure zones, as follows:

- Retailers must grade all food and beverage products located in high-exposure zones (homepage, search, check-out and pop-ups sections) using the Nutri-Mark system to ensure that high-exposure zones do not include HFSS products, graded as “C”, “D” or “E” (e.g., sweet confectionery, sugary drinks, sweet bakery items, sugary cereals)

All eligible retailers shall ensure the availability of the Nutri-Mark score evidence

(A–E) for all food and beverage products placed in high-traffic zones, to facilitate product inspection and verification.

- In cases where nutritional labeling is not displayed on certain products, retailers shall ensure that the relevant nutritional information is readily accessible and can be provided upon request during inspection.

2.3 Data reporting requirements

- Retailers are required to provide relevant sales data (e.g., HFSS product sales, non-HFSS product sales) as outlined by the government bodies responsible for monitoring the policy, on a periodic basis (refer to Section 5.5 for more details)
- Such data shall be submitted upon official request from the Abu Dhabi designated authority, and at least once annually as part of the policy performance review process.
- Where possible, retailers are encouraged to include a breakdown of non-HFSS and HFSS product sales to support policy performance monitoring.
- All submitted data will be handled under strict confidentiality protocols, used solely for policy monitoring and evaluation purposes.

3

Roles and responsibilities

The governmental entities and regulatory mandates will form the basis for the policy’s authority, implementation, and enforcement.

Entity	Role	Responsibility
Abu Dhabi Department of Economic Development (ADDED)	Regulator of business licences	Imposes disciplinary actions including but not limited to fines, licence suspensions, and revocation for non-compliant entities
Department of Health (DOH)	Regulator for health	The regulative body of the Healthcare Sector in the Emirate of Abu Dhabi, established based on Law No. (10) of 2018
Abu Dhabi Public Health Center (ADPHC)	Regulator of nutritional guidelines	Defines and regulates criteria for non-HFSS and HFSS F&B products and brands
Quality and Conformity Council (QCC)	Publisher of standards and certification processes	<ol style="list-style-type: none"> 1. Publishes standards and develops certification processes for F&B advertisers as per Abu Dhabi Public Health Center (ADPHC) and working group criteria 2. Verify the accuracy of legal measurement units indicated on product information cards and ensure their compliance with the provisions of Cabinet Resolution No. 85 of 2023 regarding Legal Measurement Units. 3. Verify the accuracy of quantities declared on information cards in pre-packaged goods, including health food products, in accordance with the provisions of Cabinet Resolution No. 83 of 2024 regarding the Product Quantity Regulation in Pre-Packaged Goods.
Abu Dhabi Agriculture and Food Safety Authority (ADAFSA)	Regulator for policy compliance and enforcement	Regulates and oversees food safety across Emirate of Abu Dhabi, and ensure compliance across the food supply chain



4

Food classification framework

Adherence to Nutri-Mark Identification:

- Retailers are responsible for ensuring that products placed within restricted zones (e.g., entrances, checkouts, aisle ends, and high-exposure digital zones) are graded in accordance with Nutri-Mark requirements, whether the score is displayed on-pack or determined using available nutritional information.
- Products graded as A or B shall be classified as non-HFSS and permitted for display in high-exposure zones, while products graded C, D, or E shall be classified as HFSS and restricted from these areas.
- Retailers and manufacturers are not required to place a Nutri-Mark label on products they have graded.

Retail stores / Product placement	Products meeting Nutri-mark grades A & B standards	Products meeting Nutri-mark grades C, D, & E standards
In-store/ online grocery retail products placement	Permitted in high-exposure and high-traffic zones	Not Permitted in high-exposure and high-traffic zones

Table 3: Requirements of this policy for different types of products

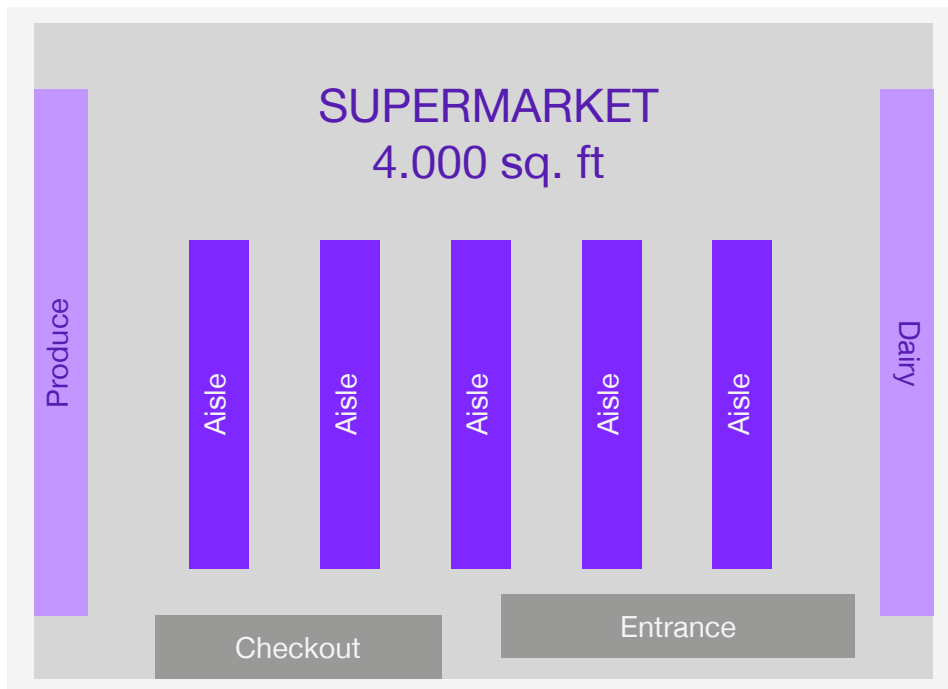
(This classification framework is informed by the Nutri-Mark nutrition labelling standard (ADG 044:2024) issued by the Abu Dhabi Quality and Conformity Council (QCC), as cited under Reference No. 8.)

5

Annexure

5.1 Image for eligibility criteria

Retail floor area of the supermarket



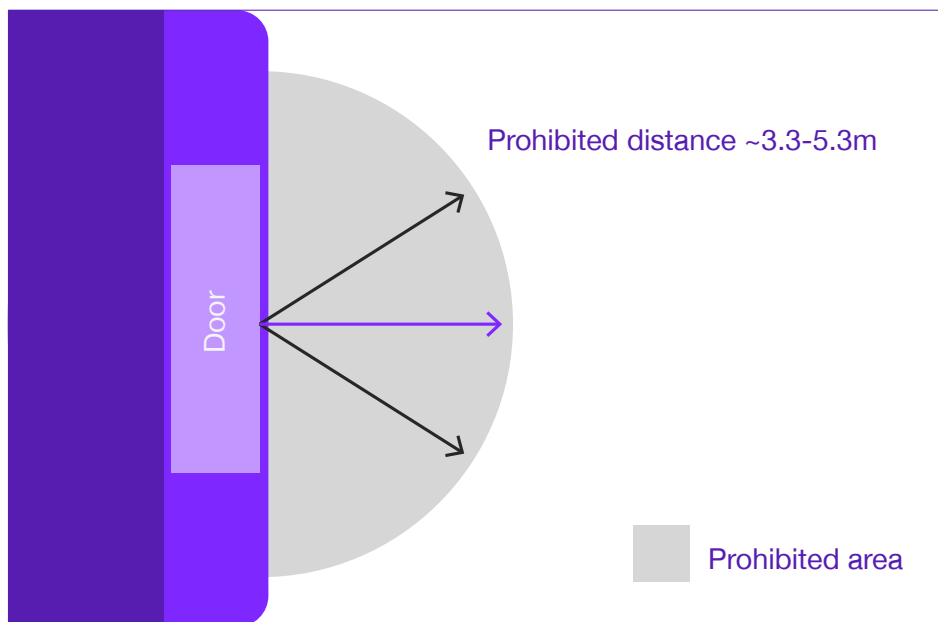
5.2 Images for scope of policy

5.2.1: High traffic zone # 1 – store entrances:

HFSS placement is restricted both within the covered internal entrance area (e.g., foyer or lobby) and around the main store entrance, with a defined prohibited zone of 5.3-3.3 meters (depending on size of store)

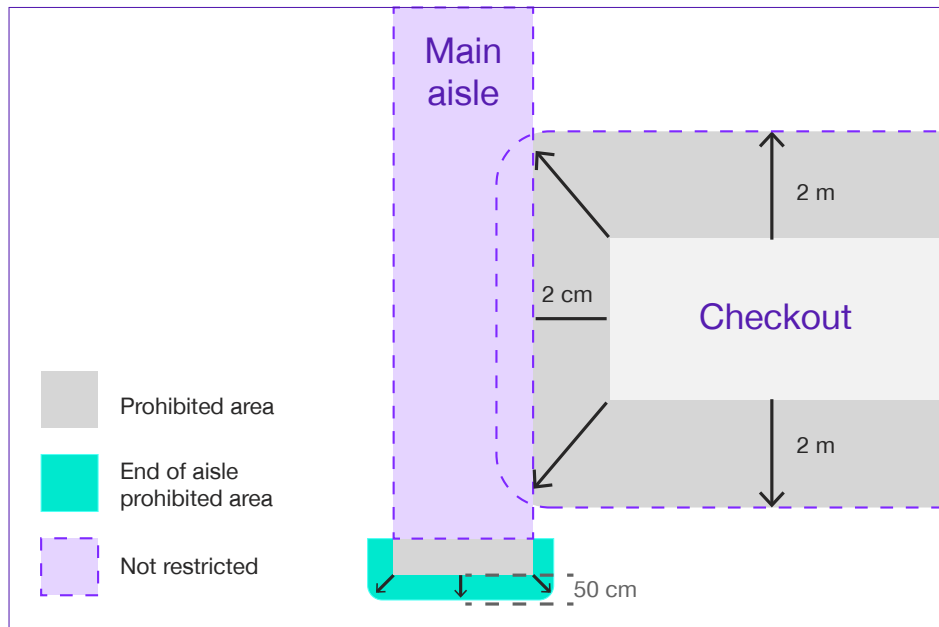
Prohibited distance ~5.3-3.3m

HFSS products cannot be placed within 5.3-3.3m of a single door entrance (depending on size of store)



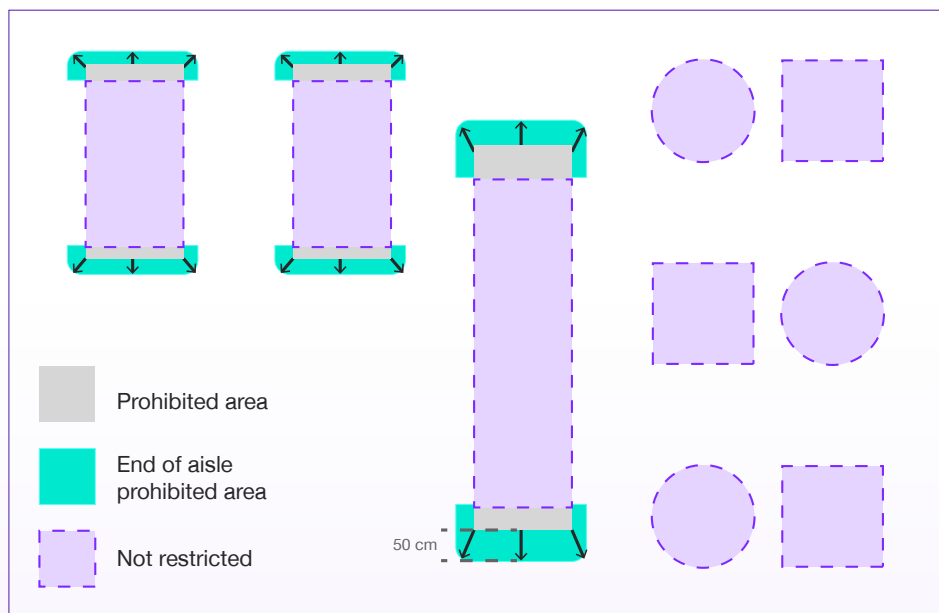
5.2.2: High traffic zone # 2 – checkout:

HFSS products cannot be placed within 2m of any checkout area. Placement is allowed in aisles, but not at aisle ends (within 50cm)



5.2.3: High traffic zone # 3 – end of aisles:

HFSS products cannot be displayed at aisle ends or within 50cm of them. Island-type structures are permitted



5.3 Images of restrictions on placement of products

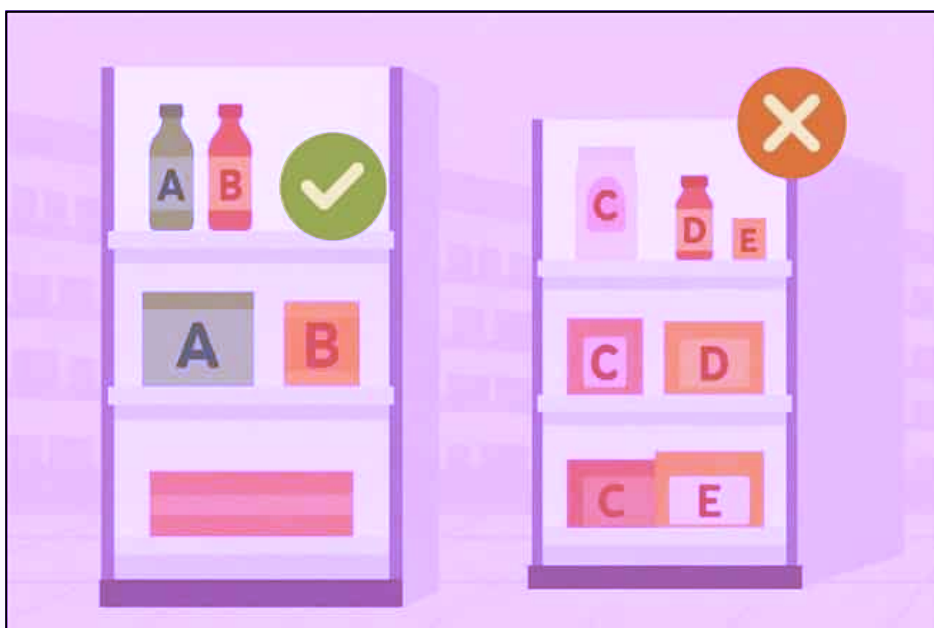
5.3.1: High traffic zone # 1 – checkouts:

Restriction on placement of HFSS products at checkout area



5.3.2: High traffic zone # 2 – end of aisles:

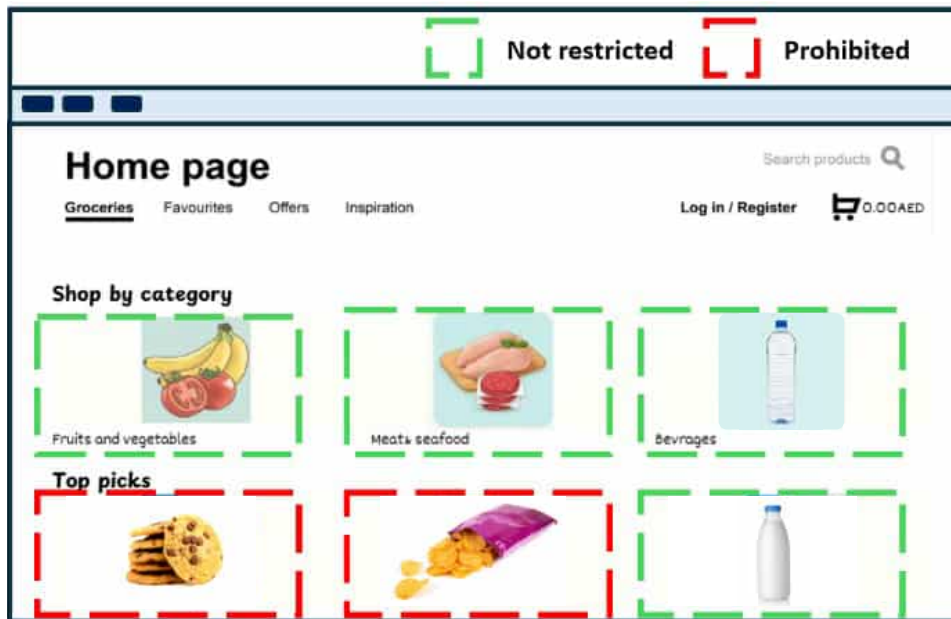
Restriction on placement of HFSS products at end-of-aisle



5.4 Images for supermarkets & grocery platforms/websites

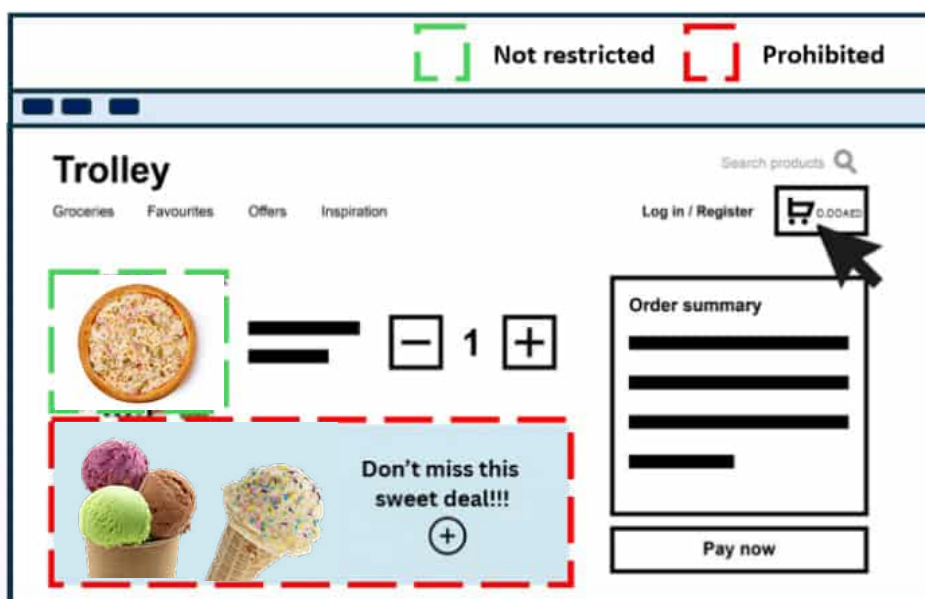
5.4.1: High traffic zone # 1 – homepage:

Figure 1. Homepage: HFSS items like cookies/crisps being featured on the homepage are prohibited



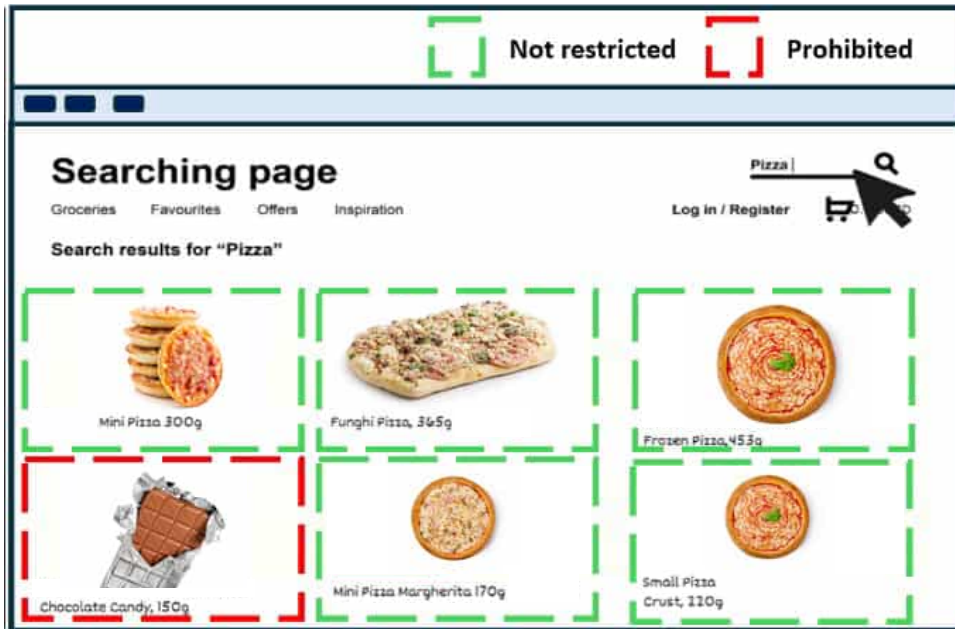
5.4.2: High traffic zone # 2 – checkouts:

Figure 2. Checkout: Placement of HFSS items such as the ice cream are prohibited, unless already in cart for the customer



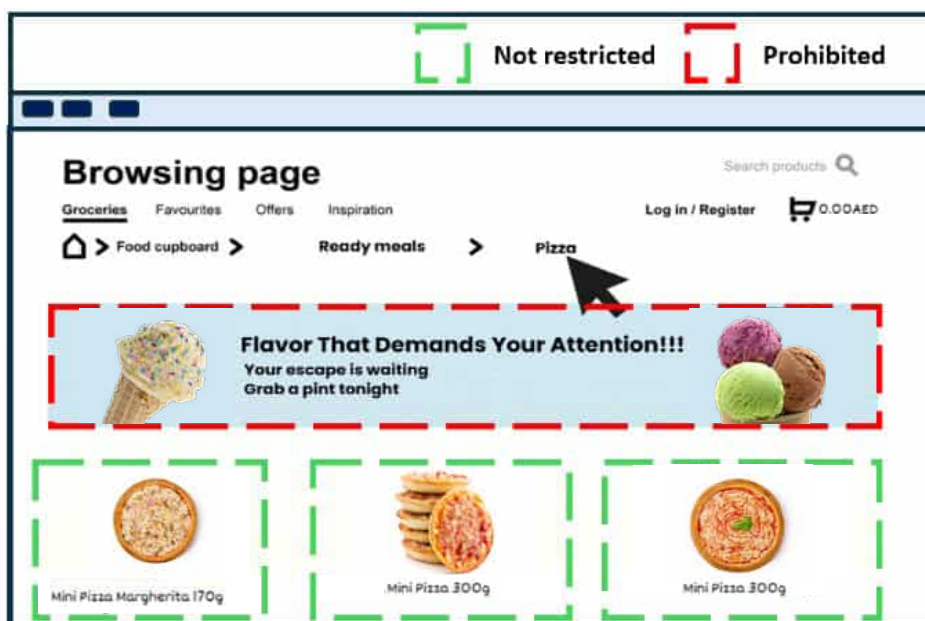
5.4.3: High traffic zone # 3 – search:

Figure 3. Search: HFSS items can only appear unless searched for; Chocolate Candy (since not searched for) are prohibited



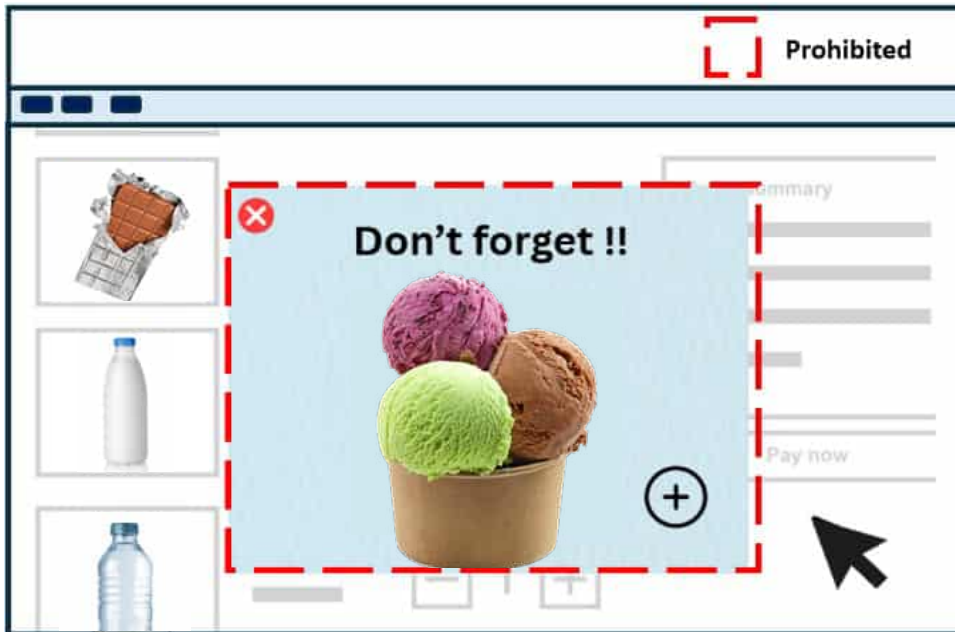
5.4.4: High traffic zone # 4 – Browsing:

Figure 4. Browsing: HFSS items can only appear unless browsed for; pizza is permitted since browsed for and ice cream (since not browsed for) is prohibited



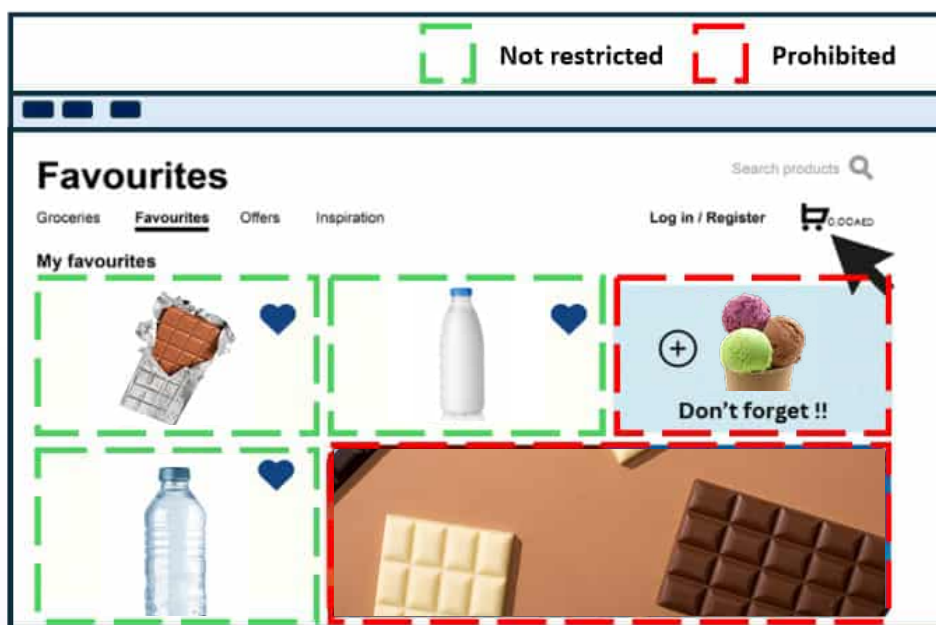
5.4.5: High traffic zone # 5 – Popups:

Figure 5. Pop ups: Pop-up advertisements of any foods that fall within the scope of this policy including an ice cream is prohibited

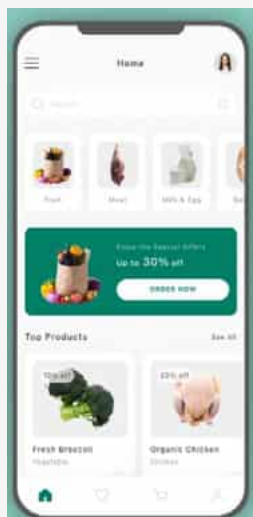


5.4.6: High traffic zone # 5 – Favourites:

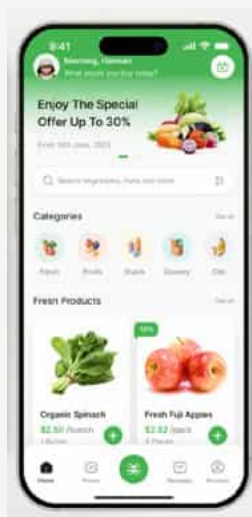
Figure 6. Favorites: Products marked by the user can appear in this section, even if they are HFSS; products like Chocolate Bars cannot be permitted unless specifically marked as favorites



Online platforms managed by grocery retail



Grocery aggregators



In-app grocery services



5.5 Type of Data to Be Collected (non-exhaustive)

Sales Data by Product Health Category

- Sales value and volume of non-HFSS (Nutri-Mark A–B) and HFSS (Nutri-Mark C–E) products
- Breakdown of sales by product category (e.g., beverages, snacks, bakery, ready-to-eat)

Sales Data by Exposure Zone

- Sales data of products located in restricted zones (e.g., entrances, checkouts, aisle ends, homepage banners) versus non-restricted zones

Comparison of HFSS versus non-HFSS product sales in high-exposure areas

- Distribution of non-HFSS and HFSS product sales across channels (e.g., in-store, online, app)

Time-Series Data

- Periodic sales data (e.g., monthly or quarterly) to monitor shifts in consumer purchasing patterns following policy implementation



6

References

1. [Law No. \(14\) of 2019: Establishment of Abu Dhabi Public Health Centre \(ADPHC\): Legal decree establishing ADPHC and empowering it to oversee public health initiatives in Abu Dhabi.](#)
2. [ADPHC/DoH: SEHHI Program Guidelines \(2025\):](#) Abu Dhabi's healthy food program documentation, including nutritional criteria for the SEHHI (formerly Weqaya) logo and spectrum classifications for food and beverages.
3. [UAE Nutri-Mark Nutrition Labelling Regulation \(2025\):](#) Emirate-wide mandate (first phase effective 1 June 2025) requiring front-of-pack nutrition grading of certain packaged foods.
4. [UK Food \(Promotion and Placement\) Regulations \(2021\):](#) Legislative precedent from the United Kingdom that restricts placement of HFSS products in stores larger than 185.8 m², effective October 2022.
5. [HFSS Display in Supermarkets \(England\), Observational Study \(2025\):](#) Research showing a reduction in space devoted to HFSS products in restricted areas—from approximately 38% before legislation to around 6% after—based on observational data from 23 stores.
6. [Berkeley Healthy Checkout Ordinance, Municipal Code \(BMC 9.82.030\):](#) Legal text mandating that only products meeting specified nutritional criteria may be sold in checkout areas of large stores.
7. [Berkeley City Council, Healthy Checkout Ordinance Supplemental Material \(2024\):](#) Council meeting documentation providing updates, supporting materials, and policy implementation details for the Healthy Checkout Ordinance.
8. [Abu Dhabi Quality and Conformity Council \(QCC\), Nutri-Mark Nutrition Labelling Standard \(ADG 044:2024\):](#) Official standard establishing front-of-pack nutrition grading requirements for packaged foods in Abu Dhabi.
9. [Euromonitor International - Definition of supermarkets and hypermarkets:](#) supermarkets have ~4,000 25,000 sq. ft of selling space, while hypermarkets have selling area over 25,000 sq. ft
10. [UK – HFSS Promotion Restrictions \(2021\):](#) Regulation limiting the promotion and placement of high fat, sugar, and salt foods across physical and digital retail environments.
11. [UAE – Federal Food Safety Law No. 2015\) 10\):](#) Foundational law covering food safety and nutrition labelling across all distribution channels, including digital platforms.
12. In Table 1 the measurement of the prohibited distance from the entrance was derived from the formula $\sqrt{(0.03 \times a)}$, where a is the store floor area and the coefficient 0.03 is included in the guidance formula for calculating the prohibited distance at store entrances.[4]



Definitions and abbreviations

- **Enforcement actions:** Measures that regulatory authorities may take to ensure adherence to this policy.
- **F&B:** An abbreviation for Food and Beverage, referring to any edible product or drink intended for human consumption.
- **Government:** The Government of Abu Dhabi.
- **Grace period:** A specified introductory period after this policy comes into effect during which enforcement is educational or advisory in nature rather than punitive.
- **Non-HFSS Food:** Foods and beverages that are low in added sugar, salt, and saturated fat, and high in nutrients (Nutri-Mark grades A or B).
- **HFSS products:** Foods and beverages that are high in calories, fats, sugars, or sodium, and low in beneficial nutrients (Nutri-Mark grades C, D or E).
- **High-exposure zones (In-store):** Key areas in a store that attract maximum shopper attention or foot traffic, thereby offering high visibility to products. For this policy, high-exposure zones are defined to include:

a) **Store entrances:** All floor space within the prohibited distance (as specified in the matrix below) of a in-store grocery retail's main entrance(s), including any promotional display areas in the front foyer or just outside the entry

In-store grocery retail floor area (m ²)	Prohibited distance from entrance (m)
371.6 m ²	3.3 m
464.5 m ²	3.7 m
557.4 m ²	4.1 m
650.3 m ²	4.4 m
743.2 m ²	4.7 m
836.1 m ²	5.0 m
929 m ² and above	5.3 m

b) **Checkout areas:** All cashier or payment locations, including both human-operated & self-checkout, and any racks or shelves adjacent to or within 2 meters of a checkout counter or queue line.

c) **End-of-aisle displays**: The shelf space or display fixtures at both ends of aisles, including any display located within 50 cm of the aisle end

➤ **High exposure zones (platforms)**: Key areas on a digital platform that attract maximum shopper attention, thereby offering high visibility to products. For this policy, high-exposure zones are defined to include:

a) **Homepage section**: The main landing page of a digital platform or website that is first displayed to users, typically featuring key navigation menus, promotional banners, and category listings.

b) **Checkout section**: Associated interface where users review their selected items, provide payment and delivery details, and confirm their order

c) **Search section**: Function that enables users to enter keywords or filters to locate specific products or categories within the platform

d) **Pop-ups section**: Temporary on-screen messages or windows that appear to provide notifications, offers, or prompts for user action

➤ **Nutri-Mark**: A front-of-pack nutrition label announced in Abu Dhabi in 2025, grading packaged foods from “A” (healthiest) to “E” (least healthy) based on calories, sugar, saturated fat, salt, and beneficial nutrients. The scheme, not yet in force, will apply only to a limited range of products rather than all packaged foods.

(Until the Nutri-Mark standard is formally adopted at the federal level, retailers shall classify products based on the nutritional information available on the package, using the Nutri-Mark guideline and the TAMM platform as reference tools for calculating the Nutri-Mark grade)

➤ **Prepacked food and beverages**: Any single item for final consumer, consisting of a food and the packaging into which it was put before being offered for sale, in such a way that the contents cannot be altered without opening or changing the packaging.

➤ **In-store grocery retailers**: Supermarkets, grocery chains, large food retailers and other retail establishments operating within the Emirate of Abu Dhabi, that sell prepacked food and beverages for direct consumer purchase.

➤ **Retail floor area**: Refers to the internal area of a store used for displaying or selling goods, but excludes areas that are: (i) not used for displaying or selling goods; (ii) mainly used for preparing or selling food to eat immediately; and (iii) used for customer consultations related to medical services (e.g., pharmacy rooms);

➤ **SEHHI**: “Safe Eating, Healthy Habits, Informative Choices” is an initiative launched by the Abu Dhabi Public Health Centre (ADPHC) in 2022 to promote healthier food choices in various establishments across the Emirate.

➤ **Online interface**: The layout and design of digital retail platforms, including websites, mobile apps, and in-app grocery services. They determine how products are organised, displayed, and promoted.

➤ **Online grocery retail platforms**: Digital channels that enable consumers to purchase groceries and related products through the internet, offering convenience, accessibility, and home delivery or pick-up options. These platforms can take different forms, like:

a) **Grocery platforms/websites**: Online platforms operated directly by in-store grocery retail, where consumers can browse their full product range and place grocery orders for home delivery or click-and-collect.

b) **Grocery aggregators**: Independent apps or websites that consolidate offerings from multiple supermarkets and grocery stores, allowing customers to shop from different retailers through a single digital interface.

c) **In-app grocery services**: Dedicated online grocery stores integrated within broader food delivery apps, typically supported by dark stores or micro-fulfillment centers to enable rapid delivery of essential grocery items.