



Department for
Business & Trade

Statutory Review of the Groceries Code Adjudicator: 2022-2025

Presented to Parliament pursuant to Section 15(7) of the Groceries Code
Adjudicator Act 2013

April 2026



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Ministerial foreword

I am delighted to publish the report on the fourth statutory review of the Groceries Code Adjudicator (GCA) covering the period from 1 April 2022 to 31 March 2025.



The last three years have continued to be challenging for both suppliers and retailers due to ongoing global political instability and continuing inflationary pressures. This of course follows the previous pressures of the impact of the Covid pandemic, the war in Ukraine and the impact these global events have had on cost price inflation.

Given this difficult landscape, I am particularly pleased to see that the Review once again found the GCA to be a broadly effective regulator who is held in high regard throughout the groceries sector. The GCA's annual supplier surveys ('GCA survey') show that awareness of the GCA has remained consistently high over the review period, and that levels of issues faced by suppliers have continued to fall since the first GCA survey in 2014.

There is, of course, always room for improvement and the Review has identified three areas which the Government would invite the GCA to consider and take forward:

1. Stakeholder confidence in the GCA's collaborative approach:

- a. consider the concerns expressed from some stakeholders about the GCA's limited use of its investigatory powers; and
- b. take any necessary action to ensure the basis and effectiveness of the GCA's regulatory approach in enforcing the Code is well understood.

2. Fear of reprisals deterring suppliers from reporting matters to the GCA:

- a. continue considering the concerns of some suppliers about the consequences of raising issues for their businesses; and
- b. take any necessary action to ensure suppliers' concerns are not preventing the GCA receiving sufficient information to effectively enforce the Code, with particular attention paid to harder-to-reach suppliers.

3. Transparency of GCA activity in practice:

- a. consider the concerns of stakeholders requesting practical examples; and
- b. ensure that suitable information is available to support the GCA's purpose of enforcing and encouraging compliance with the Code.

This Review also considered changes in the food supply landscape since the last review, most notably the Agriculture Act 2020, the subsequent Fair Dealings Regulations and the establishment of the Agricultural Supply Chain Adjudicator (ASCA), to enforce those regulations. The Review's consultation therefore additionally asked questions around the GCA's effectiveness given the establishment of the ASCA, whether the current GCA model was still effective, and if there was any evidence of unfair contractual practices that

may have a negative impact on parts of the supply chain not covered by the Groceries Code or the Fair Dealings Regulations.

Whilst the Review found that the current GCA model was still effective and that its independence from Government is highly valued, it found that there was some confusion about the GCA and ASCA's remits and a need for them to be clearer on their respective remits and how they work together. Responses to the Review suggested there might be unfair contractual practices in areas not covered by the Groceries Code or Fair Dealings Regulations. Some stakeholders suggested creating a single supply chain regulator, encompassing the current remits of the GCA and ASCA, to address this. The Government acknowledges these views and notes that the groceries operating environment and the food supply chain landscape have changed since the GCA was established. The Government also notes the independent Farm Profitability Review¹ by Baroness Minette Batters published in December 2025, which reached similar conclusions.

In light of this, the Government has decided to transfer departmental responsibility for the GCA to the Department for Food and Rural Affairs (Defra) to strengthen policy alignment between the GCA and the ASCA who is based at Defra. This transfer will support a more coherent oversight of supply chain regulation and will reduce duplication of effort between two departments. Having responsibility for both Adjudicators sitting with one department will further streamline Ministerial oversight and Parliamentary accountability. The Government will also be in a better place to consider how best to address potential gaps in the supply chain raised by stakeholders in this Review.

Whilst beyond the formal scope of this Review, some stakeholders mentioned irresponsible business practices negatively affecting workers in the food industry. The UK's Trade Strategy², launched in June 2025, includes a review of the Government's approach to Responsible Business Conduct (RBC) policy. The RBC Review focuses on the global supply chains of businesses operating in the UK and will be critical to ensuring that businesses operate in a way that respects human rights, labour rights, the environment, and anti-corruption measures across their operations and supply chains.

I would like to thank everyone who responded to the Review's consultation and also those stakeholders who took time to speak to Government about their experiences.

I would also like to thank Mark White and his team, for all their excellent work in continuing to promote fair practices in supply chains.



Kate Dearden MP
Minister for Employment Rights and Consumer Protection

¹ [Farming Profitability Review 2025: an independent review - GOV.UK](#)

² [The UK's Trade Strategy - GOV.UK](#)

Executive summary

1. Following consideration of the evidence, the Review found the GCA to be a broadly effective regulator that made good use of its powers, adopting a proportionate and collaborative approach which usually resolved issues before the need for an arbitration or investigation.
2. The Review found strong support for the GCA's collaborative style, particularly from designated retailers, who valued its proportionate, partnership-based approach. While some consultation respondents - mainly charities, social enterprises and several MPs - expressed a preference for more frequent use of formal investigatory powers, these views often related to wider questions of supply chain fairness and aspirations to expand the GCA's remit beyond direct suppliers to the 14 designated retailers. There were also indications that limited visibility over the GCA's enforcement activity had left some suppliers frustrated.
3. The annual GCA survey results provide evidence of the GCA's broad effectiveness as a regulator; the surveys show the proportion of suppliers who had any issues (as defined in the Code) continues to reduce, with 79% of suppliers reporting issues in 2014 when the GCA survey began³, down to only 30% in 2025. The percentage of reported issues over the three-year review period was also low at 35% in 2022, 36% in 2023 and 33% in 2024.
4. Despite the GCA's success in reducing Code issues, external factors, such as inflationary pressures have continued to create tension between retailers and suppliers.
5. The Review also found that that GCA had been effective in improving supplier and retailer awareness of the Code, of the GCA and in improving supplier confidence in raising issues with retailers and the GCA. The GCA survey results showed that awareness of the GCA has remained consistently high over the last three years and willingness to raise issues with the GCA has also remained stable⁴. Awareness of the GCA operating confidentially has also remained high, with scores all being 80% or more since 2022⁵, although the 2025 GCA survey deep dive⁶ suggested there is more to do, especially amongst micro suppliers.
6. The Review, however, found that concerns about upholding supplier confidentiality and fears of reprisals remain. This was despite the GCA's efforts to address this, including promoting the existing confidential reporting platform, 'Tell the GCA', and the GCA obtaining reaffirmed commitment from designated retailers that suppliers will not face negative consequences when raising issues⁷. The GCA's 2025 survey found that the main reason suppliers hesitated to report issues to the GCA in 2025 was fear of retailer retaliation. The 2025 GCA deep dive further highlighted that suppliers believed 'no retaliation' assurances were not working in practice. This

³ See GCA Survey 2025 for a trend over time from 2014 to 2025

⁴ [GCA Survey 2025](#)

⁵ [GCA survey 2025](#); [GCA survey 2024](#); [GCA Survey 2023](#); [GCA Survey 2022](#)

⁶ [YouGov slides - GCA Annual conference 2025.pdf](#)

⁷ The Code Compliance Officers' commitment: [Code Compliance Officer contact details and commitment to confidentiality - GOV.UK](#)

builds on the 2024 GCA deep dive⁸, where there was a strong appetite for a third-party advisory body separate to the GCA that could confidentially hear issues. Similar concerns were reported by MPs in two GCA related 2025 Westminster Hall Debates, and by supplier representative groups responding to the consultation, who feared it may still be possible to identify suppliers, especially those in short supply chains.

7. Most respondents felt that the GCA's impact on the groceries market had been positive, however some said there were issues with the Code's remit, which they felt could be updated to reflect changes in business operating models. This was further echoed by concerns mentioned by those responding to the additional question about parts of the supply chain not covered either by the Code or the Fair Dealings Regulations. Other comments in relation to the GCA's impact on the groceries market mentioned imbalances in the system due to differences between small and large retailers, and small retailers and larger suppliers.
8. There were also differing views around the remit of the Code and GCA, including that the current £1 billion turnover threshold for designation in the Groceries (Supply Chain Practices) Market Investigation Order 2009 (the Order), is arbitrary and excludes many retailers with significant supply chain influence. It was suggested that lowering this threshold would ensure consistent standards across the market, prevent competitive distortions, and strengthen the GCA's ability to improve practices. Changes to the Groceries Code are a matter for the CMA to consider in line with competition legislation. It is also for the CMA to consider whether a retailer reaching the turnover threshold should be designated under the Code. In 2018, during the second statutory review, the CMA committed, on an annual basis, to collect information from grocery retailers to determine whether there were further retailers that met the turnover threshold to be considered for designation under the Code. The Government notes that, four retailers have been added since the second review period, including Amazon, which suggests that the CMA's approach is reflecting changes in the grocery retail market.
9. A small number of consultation respondents raised some specific issues which they felt would make the GCA more effective when delivering its key objectives, but the Review did not find evidence to support these points. The Government also notes that the GCA is subject to the Regulators' Code⁹ and that the evidence from this Review suggests the GCA is meeting the expectations of that Code (including by taking a transparent approach to regulation and by engaging openly).
10. The Review found that the maximum financial penalty of 1% of all turnover gives the Adjudicator significant scope to impose an appropriate financial penalty. There was limited evidence to support the need to change the penalty amount, which most stakeholders supported as being at an appropriate level. The Review also found, consistent with the views of the majority of consultation respondents, that the

⁸ [GCA Survey 2024-deep dive](#)

⁹ [Regulators' Code](#)

information which the GCA may consider when deciding whether to investigate should not be restricted¹⁰.

11. To assist the GCA in further improving its effectiveness, the Review has identified three areas for the GCA to consider, regarding:

I. Stakeholder confidence in the GCA's collaborative approach:

- a. consider the concerns expressed from some stakeholders about the GCA's limited use of its investigatory powers; and
- b. take any necessary action to ensure the basis and effectiveness of the GCA's regulatory approach in enforcing the Code is well understood.

II. Fear of reprisals deterring suppliers from reporting matters to the GCA:

- a. continue considering the concerns of some suppliers about the consequences of raising issues for their businesses; and
- b. take any necessary action to ensure suppliers' concerns are not preventing the GCA receiving sufficient information to effectively enforce the Code, with particular attention paid to harder-to-reach suppliers.

III. Transparency of GCA activity in practice:

- a. consider the concerns of stakeholders requesting practical examples; and
- b. ensure that suitable information is available to support the GCA's purpose of enforcing and encouraging compliance with the Code.

12. With regards to the additional topics considered as part of this Review, which fall outside its statutory terms of reference, the Review found that the current GCA model was still effective and that its independence from Government is highly valued. Some comments suggested the GCA's limited remit being restricted to direct suppliers of the 14 designated retailers, and the current GCA model may be outdated in today's complex supply chain landscape. Consultation responses revealed varying levels of understanding about the GCA and ASCA's respective remits, although the GCA's role was generally better understood, partly as it has been in existence longer than the ASCA. The Review also found that there was a greater need for the GCA and ASCA to more fully explain their respective remits, how they work together and how they deal with scenarios involving both Adjudicators. The Government believes the forthcoming transfer of GCA departmental responsibility to Defra will help both Adjudicators work together more effectively, especially when handling scenarios involving both Adjudicators and when explaining their respective remits to stakeholders.

13. Regarding evidence of unfair contractual practices that may have a negative impact on parts of the supply chain not covered by the Code or the Fair Dealings Regulations, the Review found several consultation respondents, especially trade associations, charities/social enterprises and suppliers/supplier representative groups reporting concerns. These included indirect supplier vulnerability, pressure

¹⁰ S.15(11) of the Act allows the Secretary of State, following a review, to restrict the information the GCA can consider when deciding whether to launch a review to information provided by a supplier; information that is publicly available; information provided by a person employed by the retailer in question or information provided by the retailer in about its compliance with a recommendation by the GCA following an investigation.

cascading through supply chains, direct suppliers holding increasing power over primary producers, exploitative financial arrangements and poor purchasing practices. The Review found some support for the creation of a single supply chain regulator, encompassing the current remits of the GCA and ASCA, but with strengthened powers and resources.

14. Whilst the Government believes there is insufficient evidence from this Review to support establishing a single supply chain regulator at this point, it recognises that the operating environment has changed, and the strength of feeling around supply chain fairness. The Government believes that transferring departmental responsibility for the GCA to Defra will support a more coherent oversight of supply chain regulation, clarify Ministerial responsibility and reduce duplication of effort between the two departments. The Government will also continue the roll out of its Fair Dealings Regulations and will keep the wider framework for supply chain fairness under review.

Background to the Statutory Review

15. The Groceries Code Adjudicator ('GCA') was established under the Groceries Code Adjudicator Act 2013 ('the Act')¹¹. The GCA monitors compliance with and enforces the Groceries Supply Code of Practice ('the Code')¹² which regulates the relationship between retailers designated under the Code and their direct suppliers.
16. The 14 designated retailers are Aldi Stores Ltd ('Aldi'), Amazon.com, Inc ('Amazon'), Asda Stores Ltd ('ASDA'), B&M European Value Retail plc ('B&M'), Co-operative Group Ltd ('Co-op'), Iceland Food Ltd ('Iceland'), J Sainsburys plc ('Sainsbury's'), Lidl GB Ltd ('Lidl'), Marks and Spencer plc ('Marks and Spencer'), Ocado Retail Ltd ('Ocado'), Tesco plc ('Tesco'), TJ Morris Ltd (trading as Home Bargains), Waitrose Ltd ('Waitrose') and Wm Morrison Supermarkets Ltd ('Morrison's'). The Competition and Markets Authority (CMA) assesses annually whether any further retailers have a turnover of £1bn or more in UK grocery sales ('large retailers' as defined by the Code) and should be designated under the Code.
17. Section 15 of the Act requires the Secretary of State to review the performance of the GCA every three years. This report covers the fourth such review ('the Review') and is for the period from 1 April 2022 to 31 March 2025¹³. The statutory review is not a review of the Code, which is a competition measure owned by the CMA, nor is it a review of the GCA's remit. The Act specifies certain issues which the Review must address, what action the Secretary of State may take following the Review and who

¹¹ <https://www.legislation.gov.uk/ukpga/2013/19/contents/enacted>

¹² <https://www.gov.uk/government/publications/groceries-supply-code-of-practice>

¹³ As required by the Act, the first Review covered the period from the creation of the GCA (in June 2013), to 31 March 2016. The Secretary of State's response to that review was published in July 2017 (<https://www.gov.uk/government/publications/groceries-code-adjudicator-statutory-review-2013-to-2016>). The second review covered the period from 1 April 2016 to 31 March 2019. The Secretary of State's response to that review was published 22 August 2019 (<https://www.gov.uk/government/publications/response-to-the-statutory-review-into-the-gca-2019>). The third review covered the period from 1 April 2022 to 31 March 2025. The Secretary of State's response to that review was published 19 July 2023 (<https://www.gov.uk/government/publications/groceries-code-adjudicator-statutory-review-2019-to-2022>)

must be consulted as part of the review¹⁴. These points are covered in the Terms of Reference ('ToR'), which can be found at Annex A and are summarised below:

Issues the Review must address:

- how much the GCA's powers have been exercised;
- how effective the GCA has been in enforcing the Code; and
- whether to limit the information that may be considered by the GCA when deciding whether to investigate.

The Review may also consider:

- whether to change the Permitted Maximum Financial Penalty the Adjudicator can impose following an investigation into non-compliance.

Who must be consulted as part of the Review:

- the Adjudicator;
- the CMA;
- the retailers designated under the Code
- suppliers and/or their representatives;
- consumers and/or their representatives; and
- any other person the Secretary of State thinks appropriate.

18. Due to significant changes in the food supply landscape since the last Review, this consultation also asked for views on topics which may be outside the scope of this Review:

- The current GCA model and potential consolidation with another public body.
- Understanding of the GCA's remit in relation to the Agricultural Supply Chain Adjudicator (ASCA) – the Adjudicator responsible for enforcing the Fair Dealing Regulations made under the Agriculture Act 2020; and
- Unfair contractual practices in parts of the supply chain not covered by either the Groceries Code or the Fair Dealings Regulations which have a negative impact on grocery suppliers.

19. The Review was evidence-led and included a public consultation which ran from 13 May to 5 August 2025. The consultation was available on the gov.uk website and invitations to respond were sent to all 14 designated retailers, organisations representing suppliers and producers, consumer bodies, the CMA and the GCA. 55 responses were received to the consultation, including 11 from designated retailers, nine direct suppliers and supplier representative bodies, 13 trade associations, four charities/social enterprises and four MPs. Details of respondents are set out in Annex C. All responses received through the consultation process were assessed against the ToRs.

20. In addition to the public consultation, this Review drew on other publicly available evidence covering the Review period including the GCA's Annual Reports and Accounts, Parliamentary debates and the 2025 Environment Food and Rural Affairs (EFRA) Select Committee's inquiry into fairness in the food supply chain. The Department for Business and Trade also held meetings with specific stakeholders at

¹⁴ <https://www.legislation.gov.uk/ukpga/2013/19/section/15/enacted>

their request. This Review also considered the independent YouGov Surveys ('the GCA survey') of suppliers carried out annually on behalf of the GCA as a central source of evidence for measures of the GCA's effectiveness over time. The 2025 GCA survey received 2,584 responses of which 2,384 were from direct suppliers¹⁵ to the 14 designated retailers. The Review further drew on YouGov's annual deep dive ('the deep dive') into the GCA survey, based on 28 in-depth 30-45 minute interviews with a range of direct suppliers who took part in the quantitative survey.

Findings of the Statutory Review

Term of Reference 1: Consider the GCA's performance from 1 April 2022 to 31 March 2025.

21. This section of the report assesses:

- how much the GCA's powers have been exercised and in what circumstances; and
- how effective the GCA has been in enforcing the Groceries Code ('the Code').

How much the GCA's powers have been exercised and in what circumstances

22. The evidence showed mixed views about the GCA's effectiveness in exercising powers during the review period. The 2025 GCA survey¹⁶ painted a positive view of the GCA's approach to monitoring, ensuring compliance with and enforcing the Code; direct suppliers were asked to provide an overall assessment of a designated retailer's compliance with the Code, with a mean score across all retailers of 93%, which was an increase of 2% from the 2024 survey results and an increase of 1% from the 2023 results¹⁷ (a comparable statistic not having been reported in the 2022 survey results¹⁸). The 2025 GCA survey deep dive¹⁹ also showed that direct suppliers' view of designated retailers' compliance with the Code improved, with the median score rising from 93.87% in 2022 to 95.02% in 2025. Although 2022 is the first year of the statutory review period, the GCA did not publish an overall mean score for that year. The published 2022 figure represents the median retailer compliance score, whereas figures published from 2023 onwards are mean scores. As a result, the 2022 value is not directly comparable to later years and should be interpreted as an indicative baseline only.

Arbitrations, investigations and enforcement activity

23. The GCA undertook three arbitrations which all concluded during the review period. There was also an ongoing arbitration from the previous review period which was completed during 2023/24. No new investigations were launched, and therefore no formal enforcement measures were used during the review period.

¹⁵ [GCA Annual Survey 2025](#)

¹⁶ [GCA Survey 2025; GCA Annual Report and Accounts 2024-25 – HC 1032](#) page 28

¹⁷ [GCA Annual Report and Accounts 2023-24](#), page 29

¹⁸ [Groceries Code Adjudicator Annual Report and Accounts 1 April 2022 – 31 March 2023](#)

¹⁹ [YouGov slides - GCA Annual conference 2025.pdf](#)

24. The CMA responded to the consultation saying that it believed the GCA's powers were sufficient and appropriate to enforce the Code, and that the GCA had been effective in undertaking its role and exercising its powers. The CMA further stated that they considered the GCA a valuable and trusted adjudicator who had made significant progress in addressing the original competition concerns identified, as evidenced by the GCA's annual survey results.
25. Some consultation respondents, including most designated retailers who responded, said it was not possible to comment on arbitrations due to the low numbers involved. As arbitrations are confidential, only the few suppliers and designated retailers who had been involved in one would be able to comment on how arbitrations have been conducted. The designated retailers who commented on arbitrations generally supported the GCA's emphasis on resolving disputes without formal arbitration when possible, viewing low arbitration numbers as a positive sign rather than a concern.
26. Several respondents - including charities, social enterprises and trade unions – attributed the low number of arbitrations to a culture of fear with suppliers fearing delisting, a risk of retaliation from retailers or other commercial consequences as they believe suppliers may be unable to maintain their anonymity during arbitration, despite confidentiality protections in place.
27. Direct suppliers and supplier representative groups had minimal comments on arbitration, mainly as they had little or no experience of it. Comments included supermarkets having the balance of power, arbitration being a big step to take, general support for the structure and principles of the GCA and support for the GCA's collaborative approach instead of enforcement.
28. A few respondents suggested that providing clear guidance and real-world case studies or anonymised examples could help reassure suppliers that disputes could be resolved fairly. They mentioned they thought this would also increase awareness of the arbitration function, especially for smaller suppliers. The Government understands this may be challenging in practice as both parties need to agree to publication, and many arbitrations are fact specific, making them difficult to summarise whilst remaining meaningful. Furthermore, the small number of arbitrations make it more likely that parties involved are identified via a process of elimination, which could impact on future commercial relationships if recognised by another retailer.
29. Although the GCA did not launch an investigation during the review period, he made clear he would do so if needed. For example, he warned Amazon that unless it took swift, comprehensive action to comply with the Code, he would not hesitate to investigate. He reiterated that if Amazon was not complying and an investigation was the most appropriate way to secure change, he would launch one.²⁰ In fact, the GCA did launch an investigation into Amazon for a suspected Code breach shortly after the Review period ended and while the public consultation for this Review was underway.
30. Views about the GCA's use of investigation and enforcement powers were mixed. Some responses, especially designated retailers, supported the GCA's collaborative, compliance-focused approach, which they felt led to quicker resolutions and

²⁰ <https://www.gov.uk/government/news/edition-38-news-from-the-adjudicator>

minimised the need for formal investigation. They noted the focus on engagement and scrutiny to achieve positive change without always requiring formal investigations and acknowledged that best practice feedback is shared broadly, not just with investigated parties. Other consultation respondents noted that the mere threat of an investigation and the GCA's activities to promote improved conduct likely had a positive influence on the behaviours of designated retailers.

31. In contrast, some respondents, including direct suppliers, expressed scepticism regarding the GCA's effectiveness in conducting investigations and thought a more active use of formal investigation and enforcement powers was necessary. Some also perceived the lack of investigations and enforcement activity as avoidance and a reflection of suppliers' fear of reprisals. The fact that there had been no formal investigations since 2019 was also raised in a Parliamentary debate²¹ on the powers of the GCA in June 2025.
32. The 2025 GCA survey deep dive ²² further showed that suppliers want greater visibility of GCA casework to help build confidence that issues are being resolved. They mentioned that limited visibility over the GCA's enforcement activity record had left some suppliers frustrated, noting little evidence of public action such as financial penalties, naming and shaming, or legal proceedings against retailers.
33. The legislation sets out that the must GCA publish guidance on the criteria the Adjudicator will use when deciding whether to carry out an investigation²³. Suggestions from respondents indicated this statutory guidance²⁴ ought to be reviewed to ensure its principles remain aligned with evolving dynamics of supply chains.
34. Some MPs who responded to the consultation also mentioned that the GCA should be able to launch an investigation without the need for a complaint. This power already exists in legislation²⁵, and the Adjudicator has set out in statutory guidance what his reasonable grounds for suspicion might be based on, including but not limited to evidence provided by direct or indirect suppliers or third parties.

Providing advice, guidance and recommendations

35. Whilst no formal interpretive guidance²⁶ was issued under s12(3) during the review period, the GCA did provide one piece of s11 advice as well as general advice, recommendations and best practice statements. The GCA also provided general advice, guidance and recommendations while working with individual designated retailers on specific issues. Nevertheless, some consultation respondents called for GCA communications to be more tailored towards smaller suppliers and other harder-to-reach audiences, to write publications using plainer language with real-

²¹ [Groceries Code Adjudicator - Hansard - UK Parliament](#)

²² [YouGov slides - GCA Annual conference 2025.pdf](#)

²³ [s12\(1\) Groceries Code Adjudicator Act 2013](#)

²⁴ [GCA Statutory Guidance updated March 2016.pdf](#)

²⁵ s4 of the [Groceries Code Adjudicator Act](#) states that the Adjudicator may investigate whether a large retailer has broken the Groceries Code if the Adjudicator has reasonable grounds to suspect that (a) the retailer has broken the Code; or (b) the retailer has failed to follow a recommendation made under section 7.

²⁶ [GCA policy Interpretive guidance best practice and voluntary agreements March 2016.pdf](#)

world examples and to ensure existing guidance was up-to date and still fit for purpose.

36. Generally, the GCA's advice and guidance in the review period was considered constructive and proportionate, but there were some calls for information to be more accessible and straightforward for suppliers to fully benefit. This was corroborated by the 2025 GCA survey deep dive ²⁷, in which micro suppliers raised the need for lighter-touch pathways and clearer guidance about escalation routes to reduce the cost and complexity when navigating compliance processes.
37. Some consultation respondents suggested the GCA could improve its outreach and communications by using plain language and real-world examples, and by tailoring engagement with smaller suppliers and those operating outside the traditional supermarket model. In his response to the consultation, the Adjudicator explained that he did not issue any s12 formal interpretative guidance during the review period because, after 15 years, stakeholders generally had a good understanding of the Code, and he did not want to risk adding undue burdens on designated retailers by publishing formal guidance. One designated retailer pointed out that the evidence base provided by previous best practice statements, interpretative guidance and outcomes from the two investigations, had produced sufficient practical guidance that builds on the provisions of the Code.
38. The GCA did work with individual designated retailers on specific issues in a more targeted fashion. This included issuing formal s11 advice to a designated retailer regarding their governance arrangements for dealing with Code compliance. The GCA also worked with Amazon, who became a designated retailer in 2022, to help their timely transition to Code compliance.
39. In their responses to the consultation, designated retailers reported they largely valued the collaborative approach of the GCA and the effectiveness of having regular meetings where feedback is listened to and actioned. One designated retailer also praised the GCA for becoming more tailored in their data requests in recent months and further commented that they appreciated this as a reduced burden on business.
40. A few designated retailers, however, felt that the GCA could be more transparent about meeting agendas and have a more open dialogue in which GCA offered views and advice without comprising future enforcement activity. Some suppliers felt that the GCA had to remain neutral and that this resulted in GCA advice, guidance and recommendations sometimes being watered down. Similar comments from suppliers also mentioned the GCA's advice being overly cautious. Other respondents, however, saw the GCA as a good communicator, providing helpful guidance, advice and information via its website, newsletters, and meetings, including useful interpretations of its annual supplier survey.

²⁷ [YouGov slides - GCA Annual conference 2025.pdf](#)

41. Consultation respondents further mentioned the GCA's helpful and quick intervention into Tesco's introduction of a fulfilment fee paid by suppliers per unit of their products purchased by consumers through Tesco's online channels. This resulted in Tesco confirming the fees were voluntary and that suppliers would not be penalised if they did not pay. The GCA also continued to monitor the situation, which was widely viewed as the Adjudicator demonstrating his effectiveness in resolving issues rapidly without needing to resort to formal investigation.
42. The GCA's guidance, especially the 7 Golden Rules for Considering Cost Price Increases ²⁸ ('7 Golden Rules') originally issued in January 2022, was still widely recognised and valued by consultation respondents for clarifying fair dealing and improving retailer behaviour. There was also a desire for the 7 Golden Rules to be formally incorporated into the Code for stronger legal standing.

How effective the GCA has been in enforcing the Groceries Code

43. In considering how effective the GCA has been in enforcing the Code, most consultation responses were positive. Respondents principally mentioned the issues raised above under 'arbitrations, investigations and enforcement activity' in paragraphs 23 to 34.
44. Suppliers generally reported that retailer buying behaviour had become more collaborative, with many of the issues they previously experienced having faded since the Code was introduced. They praised the GCA's support for suppliers, its 7 Golden Rules work, and the positive influence created simply by the GCA's existence and the possibility of enforcement.
45. Designated retailers were also predominantly positive about the GCA's enforcement approach, saying they thought it was effective and proportionate. They also highlighted the GCA's improved compliance metrics and that they valued GCA's proactive engagement with Code Compliance Officers, which helped identify and address potential issues early.
46. Some respondents, however, raised concerns. As previously mentioned, they pointed to the low number of arbitrations and investigations, and subsequent enforcement action and noted that larger retailers continued to hold significant power over suppliers and growers. Several respondents – particularly charities and social enterprises – felt the GCA's reliance on soft power and limited use of investigations reduced its effectiveness, arguing that a more visible and active enforcement regime is needed to deter unfair dealing. Others stressed that the GCA's remit, restricted to direct suppliers, limited its ability to enforce effectively across the wider supply chain.
47. The GCA survey results show that the proportion of suppliers who had any issues (as defined in the Code) continues to reduce as illustrated by the table below. 79% of suppliers reported issues in 2014 when the survey began²⁹, falling to 30% in 2025.

²⁸ [Edition 28: News from the Adjudicator - GOV.UK](#)

²⁹ [Groceries Code Adjudicator - Annual Report and Accounts 2014-15](#) – page 17

Year	2014	2022	2023	2024	2025
Suppliers reporting Code issues	79%	35%	36%	33%	30%

48. The GCA’s 2022–23 annual report³⁰ explains that the increase in reported issues in 2023 reflects Amazon’s first inclusion in the GCA survey, as it had only been designated in 2022 and initially recorded the lowest perceived compliance. Although still the lowest scores of any retailer in 2025, Amazon’s score improved from 59% in 2023 to 66% in 2025, although their performance dipped to 47% in 2024.

What has been the impact of the GCA on the groceries market?

49. Most respondents said they thought the GCA had had a broadly positive impact on the groceries market, leading to improved retailer-supplier relationships, confidence of fair treatment and protection and a cultural change of a more collaborative approach influenced by the GCA’s guidance and enforcement activity.

50. Designated retailers felt that GCA had increased Code awareness and compliance, driving good practices across all designated retailers. The GCA’s high level of interaction with retailers and associated levels of scrutiny, a better awareness of supplier concerns, and the desire for designated retailers to improve their ‘score’ in the annual GCA survey were further highlighted. Retailers also noted that the GCA’s regulatory focus prompted them to review and improve their own systems, leading to more collaborative and transparent relationships with suppliers that delivered mutual efficiencies and benefits, including for consumers. GCA survey results further show suppliers having a good understanding of the GCA and its role³¹, and a reduction in the percentage of suppliers reporting any Code-related issues.

51. Some designated retailers, however, felt that the remit and Code could be updated to reflect changes in business operating models. There were also comments that reflected an imbalance due to the differences between small and large retailers as well as between small retailers and large suppliers.

52. Comments from suppliers showed the GCA has played a crucial role in improving confidence across the supply chain, benefiting both suppliers and consumers. Suppliers were now reporting much greater confidence that they would be treated fairly, and that issues such as delayed payments and forecasting errors had declined significantly.

53. Respondents generally reported they thought GCA had been instrumental in clarifying what constitutes good practice and what behaviours are unacceptable under the Code. This, and the GCA’s deterrent effect, had contributed to a more level playing field, where suppliers found it easier, more transparent, and more

³⁰ [GCA Annual Report and Accounts 2022-23](#)

³¹ [GCA Survey 2025](#)

commercially viable to do business with major grocery retailers. This had, in turn, encouraged greater stability and investment across the groceries supply chain.

54. A few respondents felt the GCA had had no or little impact on the groceries market, citing concerns about its limited scope, lack of use of powers and size and limited resources. Specific concerns mentioned included power imbalances, limited transparency, and a ‘culture of fear’ still existing in parts of the supply chain, particularly affecting smaller businesses, including farmers. Information provided in the 2025 GCA survey deep dive further highlighted that, whilst awareness of ‘no retaliation’ was high, this did not necessarily translate to confidence in raising Code issues.³²

How effective has the GCA been in improving retailer and supplier awareness of the Code?

55. The table below shows the GCA annual survey results for relevant questions over the review period. This shows that awareness of the GCA has remained consistently high, and that there has been a very slight increase in how well suppliers understand the GCA’s roles and responsibilities and in their understanding of the Code.

Topic	2022	2023	2024	2025
Awareness of the GCA	83%	83%	84%	83%
Good or fair understanding of the GCA's roles and responsibilities	68%	68%	71%	70%
Good or fair understanding of the Code	-	74%	75%	75%
Aware of the Code ³³	88%	-	-	-

56. The GCA continued to actively engage stakeholders, including both designated retailers and suppliers throughout the review period. In 2024/25, this included 84 meetings with designated retailers to address Code-related matters and 15 meetings with individual suppliers to discuss specific Code issues. The GCA also had 25 meetings and events with various suppliers and trade association representatives, including addressing larger events held by the Northern Irish Food and Drink Association (NIFDA) and the Country Land and Business Association (CLA), and attended the UK Farm to Fork summit at 10 Downing Street in May 2024³⁴.

57. The previous years of the review period saw similar levels of activity with over 150 meetings in 2023/24 and more than 170 in 2022/23 including several large events which enabled the GCA to promote its work directly to multiple suppliers and

³² [YouGov slides - GCA Annual conference 2025.pdf](#)

³³ The 2022 GCA survey reported this question as the percentage of suppliers aware of the Code, rather than having a good or fair understanding: [GCA Annual Report and Accounts 2021-22 – HC 648](#) page 27

³⁴ [GCA Annual Report and Accounts 2024-25](#)

provided an opportunity for suppliers to share their experiences of working with the designated retailers.

58. The GCA moved its annual conference to hybrid rather than in person only in September 2023. The conference was attended by hundreds of delegates, including supplier representatives, retailers, and trade associations. The conference has continued in its successful hybrid format in 2024 and 2025. The 2025 conference was again well attended by both suppliers and designated retailers and included an address from the Adjudicator, a panel session about key issues facing the sector and presentation of the 2025 GCA survey deep dive.

59. The GCA continued to use digital tools to improve awareness of the Code, including communicating to stakeholders via its newsletter and social media channels. The GCA website remained an important tool for suppliers and other stakeholders. In 2024/25, there were over 4,500 unique page views to the website’s homepage.

How effective has the GCA been in improving supplier confidence in raising issues with retailers and the GCA?

60. The table below shows the willingness of suppliers to report to the GCA in 2022-25 compared to the first survey in 2014, based on GCA survey results³⁵.

Year	2014	2022	2023	2024	2025
Willingness to report to the GCA	38%	55%	58%	59%	59%

61. The 2025 GCA survey showed that willingness to report to the GCA had remained broadly stable in the past few years. The willingness to report has increased overall since the first GCA survey in 2014 when only 38% of suppliers had answered in the affirmative.

62. Of the 41% of suppliers that are either unwilling to, or unsure about, reporting an issue in the 2025 GCA survey, the most cited reason remained believing the retailer would find out and that there would be consequences for their business. However, this was down from 41% in 2023 to 38% in 2025. The 2022 survey does not provide a comparative percentage, but does reference that the main reasons suppliers said they would not raise issues with the GCA were 1) the retailer finding out and there being consequences for their business and 2) the issue could be addressed by the supplier themselves. One supplier responding to the consultation mentioned that guaranteed anonymity and whistleblower protections, more regional engagement, quicker resolution processes and more transparency over outcomes from previous complaints to demonstrate effectiveness, would encourage them to raise an issue with the GCA.

³⁵ [GCA Survey 2025](#)

63. GCA surveys from 2023–2025 show that awareness of the GCA’s confidential handling of information has consistently remained at or above 80% since 2022.³⁶ The GCA continued regular engagement with suppliers to explain the Code and its collaborative approach. Building on the confidentiality commitment introduced for Code Compliance Officers in 2021, all designated retailers affirmed in February 2023 that they would work collaboratively with suppliers and ensure no negative consequences for raising issues.
64. The Adjudicator explained in his consultation response how he had monitored designated retailers’ operationalisation of this commitment in a proportionate manner. He noted that the proportion of direct suppliers reporting a suffering relationship as a result of raising an issue fell from 30% in 2023 to 28% in 2025³⁷. He also used supplier engagement to reinforce that he handles information confidentially under s18 of the GCA Act and can raise issues anonymously or in aggregate to help protect supplier confidentiality. The 2024-25 Annual Report further explains that, when intervening with designated retailers, the Adjudicator does not disclose the supplier’s identity or product category. When providing oral evidence to the Business and Trade Select Committee in June 2023, the Adjudicator also reaffirmed that his statutory obligation of confidentiality is absolute.
65. Several MPs raised the fear of reprisals from suppliers who make complaints to the GCA in the two Westminster Hall Debates on the GCA in 2025. Suggestions to remedy this included anonymous reporting tools. MPs were reminded of the GCA’s existing confidential reporting platform, ‘Tell the GCA’. Similar points were raised during the EFRA Select Committee’s inquiry into fairness in the food supply chain during 2025. In his consultation response, the Adjudicator confirmed that suppliers remain able to report issues to him anonymously through this online platform.
66. The 2025 GCA survey deep dive³⁸ revealed that some suppliers were unaware of the ‘Tell the GCA’ reporting platform. Conversations with suppliers by YouGov further suggested that ‘no retaliation’ assurances were not working in practice and that there was a lack of confidence in CCOs and how to challenge their decisions. 10 of the 28 suppliers interviewed by YouGov for the GCA survey said they would not raise a Code-related issue with the GCA in the future.

Would representative groups consider raising an issue with the GCA on behalf of their members?

67. The vast majority of respondents said they would consider raising an issue with the GCA on behalf of their members. Reasons provided included representative groups believing that information provided to the GCA was valuable and enhanced the GCA’s effectiveness, and the GCA having a valuable range of tools to act on reports of potential Code breaches. There were also positive comments about the GCA’s approach to confidentiality and the knowledge that both this and the groups or their members’ anonymity would be protected.

³⁶ [GCA survey 2025](#); [GCA survey 2024](#); [GCA Survey 2023](#); [GCA Survey 2022](#) and [GCA Annual Report and Accounts 2024-25](#) pg 32

³⁷ [GCA’s Response to the GCA statutory review 2025 - GOV.UK](#)

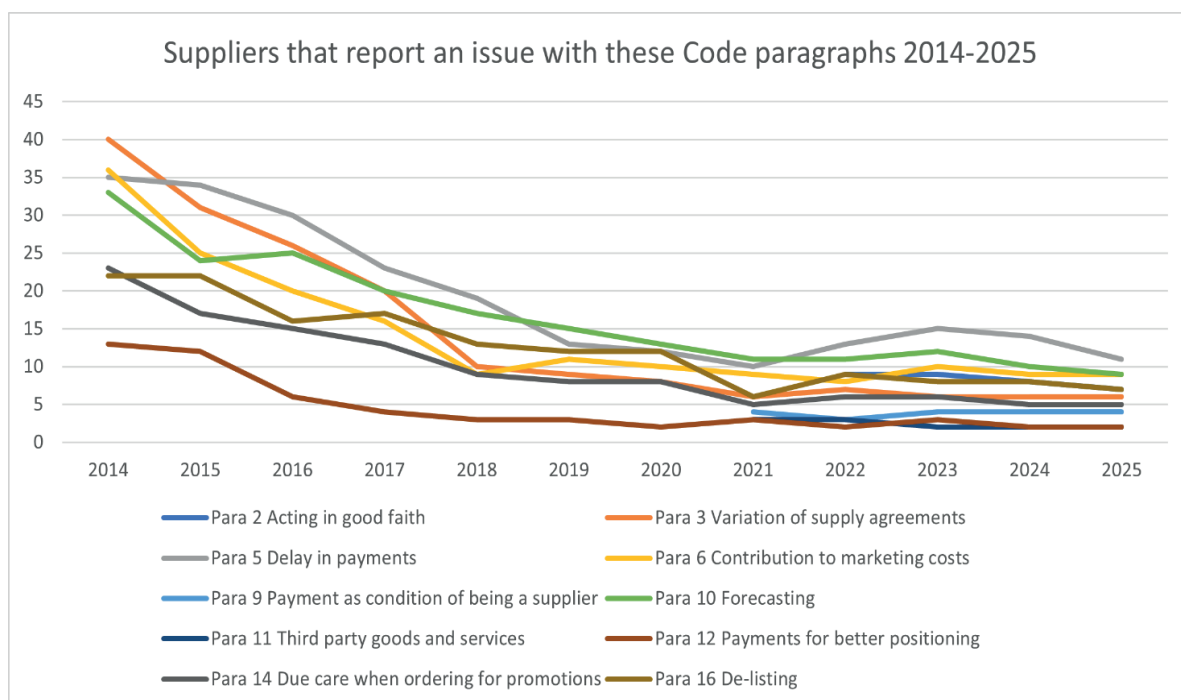
³⁸ [YouGov slides - GCA Annual conference 2025.pdf](#)

68. Many representative groups, especially those representing primary producers such as farmers and growers, however, mentioned that because many of their members did not have direct relationships with designated retailers, the GCA's scope for intervention would be limited. There were further comments that if the scope of the GCA were to be extended upstream to include the relationship between producers and processors or first purchasers, these groups would consider reporting issues. Concerns were also raised that despite the GCA's assurances around anonymity and confidentiality, it may still be possible to identify direct suppliers, especially if there are few of them in a supply chain, underscoring the need for clear communication of the GCA's confidentiality policies to primary producers.

Have direct suppliers experienced any issues with retailers covered by the Code since April 2022? Did they raise the issue with the GCA? How do suppliers feel retailer practice overall has changed since the last Review? Which issues have direct suppliers experienced in the past 12 months? (in Code terms)

69. Levels of issues faced by direct suppliers have continued to fall since 2014 as illustrated by the graph below³⁹ and the table above in paragraph 47. The volume of suppliers that experienced at least one Code issue decreased from 35% in 2022 to 30% in 2025. There was, however, a slight increase in some issues being reported in 2022 and 2023, before continuing on a downwards trajectory in 2024 and 2025.

70. The top issue (as expressed in terms of the Code) reported by suppliers over the review period has been delay in payments, followed by forecasting errors and then the obligation to contribute to marketing costs. This was broadly consistent with responses to the consultation for this Review.



³⁹ Chart taken from [GCA Annual Report 2024-25](#), pg 30, covering some of the main issues experienced by suppliers.

71. The vast majority of designated retailers have also seen improvements in suppliers' perception of their Code compliance performance from 2022 to 2025. In 2025 all designated retailers scored over 90% with the exception of Amazon, who came in at 66%; this was a 19% improvement on Amazon's 2024 result when they scored 47%, although they had performed better in their first year (2023) with 59%⁴⁰. Consultation responses corroborated this data with most respondents saying they had only rarely or occasionally experienced Code issues with designated retailers since April 2022. Of those who had experienced issues, equal numbers said they had raised the issue with the GCA as said they had not. Those who had done, so said they were either very satisfied or satisfied with how the GCA dealt with the matter. Those who chose not to raise the issue with the GCA, cited fear of penalty from retailers, concerns over confidentiality, being unsure of what was covered by the Code and if the GCA would assist and the ability to address issues themselves as reasons.
72. When discussing how issues with designated retailers had changed since April 2022, several suppliers mentioned retailers being under more pressure during periods of inflation, which in turn lead to poor behaviour towards suppliers. Increased food prices and falling retail sales since April 2022 because consumers were less able to buy groceries was cited as a particular pressure. The GCA was praised for offering support for cost prices increase negotiations which some suppliers found very useful.
73. One supplier suggested that whilst many designated retailers were now better trained to be superficially compliant with the Code, practices that eroded the margins of small suppliers persisted and a widening gap between formal compliance and practical fairness had emerged over the past three years. The importance of Code training for retailers, including staff in the Fast-Moving Consumer Goods industry, was further highlighted⁴¹.
74. The 2025 GCA survey deep dive revealed that suppliers had experienced a challenging and turbulent landscape in 2024/25, with expectations for this to continue. Specific challenges mentioned included navigating the impacts of the cost-of-living crisis, climate change affecting supply chains and an increasingly erratic and turbulent landscape due to climate change, inflation and global political and economic volatility.

Has the introduction of the GCA had an impact on product or process innovation for suppliers?

75. The majority of suppliers who answered this question reported that the GCA had not had any impact on them undertaking product or process innovation. One respondent who identified themselves as an individual rather than a supplier reported that suppliers, especially smaller ones, remained reluctant to invest in product or process innovation due to margin squeeze, cash flow uncertainty and retailer dominance discouraging long-term research and development or sustainable reformulation efforts.

⁴⁰ [Groceries Code Adjudicator Annual Report and Accounts 1 April 2022 – 31 March 2023](#)

⁴¹ [Fast-moving consumer goods \(FMCGs\)](#) are products that are sold quickly, are affordable for consumers, and have high turnover for companies.

Do suppliers now spend relatively more, or relatively less, on product or process innovation than they did three years ago?

76. Responses to this question were mixed, with several reporting no change. The only supplier who answered, 'relatively more', explained that innovation was key to driving growth in their business. Two non-supplier respondents (a trade union and an individual) answered 'relatively less'. Reasons provided included rising input costs, supply chain instability, and continued retailer pressure to cut prices had severely limited margins and flexibility resulting in less being spent product or process innovation than three years ago as suppliers were focusing on their economic survival. They also highlighted that innovation required stable and fair conditions, and that the fear of delisting or punitive terms was not conducive to creating such an environment.

What impact has the GCA had on large retailers' relationships with suppliers and has resolving a complaint with suppliers become more or less burdensome than before the GCA?

77. Designated retailers generally reported that the GCA had strengthened their relationships with suppliers. They highlighted the Code's role in providing a clear framework, the GCA's guidance and best-practice support, and the increased awareness and transparency created through regular engagement and annual GCA survey insights. Retailers also valued the GCA's encouragement for suppliers to raise concerns—whether directly with CCOs or anonymously through GCA channels—and noted that the Adjudicator's collaborative approach and use of case studies had helped improve their own internal practices.

78. Views were mixed on whether resolving complaints with suppliers had become more or less burdensome since the GCA's establishment. Some designated retailers reported no material change, as they had already had close working relationships with suppliers and their own dispute resolution procedures in place before the Code and GCA. Others highlighted that embedding Code requirements into their training, procedures and communication practices had reduced the likelihood of legal disputes arising.

79. Some designated retailers, however, pointed to a growing administrative burden. Examples included issues escalated to senior levels or CCOs requiring a detailed audit trail in case of further escalation and the reporting obligations on CCO informal monthly listening sessions - having to document these meetings and provide copies to their suppliers and the GCA. There was also mention that the Code assumed the balance of power always resides with the designated retailer, allowing the Code to be unfairly weaponised by some suppliers, and which could make dealing with some supplier complaints more time-consuming and complex.

80. A non-retailer individual highlighted the ongoing risks for suppliers despite retailers now having formal processes in place for handling Code related complaints. Issues mentioned included complaint resolution processes still being long drawn out, opaque and reliant on supplier persistence, and some complaints avoiding GCA involvement so that abuse remained hidden. They suggested that whilst the formal burden of handling complaints had eased due to clearer expectations, the informal burden on suppliers to pursue justice remained high.

81. The 2025 GCA survey deep dive⁴² further highlighted that while some suppliers noted the effectiveness of citing the Code for moving conversations with designated retailers along, others viewed mentioning the Code as overly combative. Many suppliers also reporting weighing up the seriousness of an issue against the potential damage of raising a complaint.

Do large retailers think there is a way to make the GCA more effective in delivering its key objectives?

82. Several designated retailers did not believe there were ways to make the GCA more effective, citing that the GCA provided sufficient support in delivering its key objectives and that they valued the GCA's collaborative approach.

83. Others suggested targeted improvements. They highlighted the value of strengthening Code knowledge—both by encouraging suppliers to improve their understanding and by providing clearer guidance or additional best practice material to address areas of ambiguity. Some also felt the GCA team could benefit from deeper end to end supply chain experience. Insights from the 2025 GCA survey deep dive reinforced this, showing that greater awareness of the Code, particularly among micro suppliers, would help them identify and challenge unreasonable requests.

84. Retailers also proposed measures to improve transparency and protection, such as publishing anonymised complaints data, introducing clearer investigation triggers, and working with devolved governments on regional issues. These suggestions aligned with the 2025 GCA survey deep dive findings indicating suppliers wanted greater visibility of GCA casework and were frustrated by the limited public enforcement record.

85. One retailer also noted persistent misconceptions about the GCA's role - particularly the belief that it ensures a 'fair price' - and emphasised the need for clearer communication about the boundaries of the GCA's remit and how it sits alongside other mechanisms such as the Prompt Payment Code, the Small Business Commissioner and the CMA.

86. There were also views around the remit of the Code and GCA, including the suggestion that the current £1 billion turnover designation threshold was arbitrary and excluded many retailers with significant supply chain influence. It was suggested that lowering this threshold would ensure consistent standards across the market, prevent competitive distortions, and strengthen the GCA's ability to improve practices throughout the UK groceries sector. Others, including stakeholders beyond the designated retailers, felt the Code itself should evolve to reflect modern supply chain practices such as algorithmic purchasing, just-in-time logistics, penalties and sustainability linked requirements.

What has been the impact of the GCA on consumers in relation to the quality or choice of groceries supplied by retailer?

87. Consultation responses to this question were mixed. Those who thought the GCA did not have any or a limited impact on consumers came from a variety of respondent categories including direct suppliers, individuals and those self-identifying as

⁴² [YouGov slides - GCA Annual conference 2025.pdf](#)

services/consultants. They mentioned large retailers continuing to favour scale and price over diversity, which in turn reduced the availability of local and ethically produced items.

88. There was also mention of smaller suppliers facing the risks of de-listing which further reduces consumer options, and ongoing pressure on suppliers to meet supermarket demands resulting in reduced quality products being made available to consumers, or even the replacement of certain products by cheaper alternatives. There were further concerns around supply chain centralisation by retailers, which threatened the independence of suppliers and local food sovereignty, with some calling for a more localised and transparency supply chain to better benefit regional economies and consumers. There were suggestions that the GCA could do more to protect the long-term interests of consumers by ensuring fair, transparent and localised supply chains that benefit the UK.

89. Other responses, especially those from charities, social enterprises and campaigners highlighted growing consumer expectations around sustainability and fairness in food production, noting the GCA's role in maintaining these standards by promoting transparency and supplier protection. They also raised concerns about unclear labelling especially around animal welfare and the lack of distinction between farms and practices, arguing that limited information reduces consumer choice. Respondents suggested that publishing clearer, more accessible information would help consumers make more ethical buying decisions.

The Government's conclusions on how much the GCA's powers have been exercised and in what circumstances and how effective the GCA has been in enforcing the Groceries Code

90. Consultation responses show that stakeholders, including suppliers and retailers, continue to consider the GCA to be broadly effective and to have overall exercised its powers appropriately. This is supported by GCA survey results which broadly improved over the review period. The Government therefore concludes that the GCA should continue its valuable work and may wish to consider the following:

Stakeholder confidence in the GCA's collaborative approach:

91. The Government acknowledges the different views regarding the Adjudicator's collaborative approach which some stakeholders cite as reducing the need for arbitration and investigation, while others believe a more interventionist approach would make the GCA more effective. The Government notes that perceived compliance with the Code remains high and that views on the GCA's effectiveness remain positive. The Government also notes the Adjudicator's current investigation into Amazon for a suspected Code breach.

92. The Government is mindful of the Adjudicator's operational independence but believes the Adjudicator's collaborative approach to be in line with the Regulators' Code, specifically that Regulators' activities should support growth and reduce

unnecessary regulatory burdens. The Government believes the GCA's approach to also be aligned to the Government's Regulatory Action Plan⁴³, which seeks to overhaul the UK's regulatory system and ensure regulation is targeted, proportionate and supports growth.

93. The Government further notes the specifics of s4 of the Act, which give the GCA the power to investigate if the Adjudicator has reasonable grounds to suspect a designated retailer has breached the Code, or has failed to follow a recommendation following an investigation⁴⁴. The Adjudicator must publish guidance on how he will carry out his investigation and enforcement functions before commencing an investigation, which was introduced in 2016⁴⁵. The Adjudicator has some discretion regarding the use of his statutory powers, and the GCA has since its establishment, sought to enforce the Code through collaborative regulation.
94. To continue to ensure the Adjudicator's regulatory approach is fully transparent and in line with both the Regulators' Code and the Regulatory Action Plan, the Adjudicator may wish to:
- a) consider the concerns expressed from some stakeholders about the GCA's limited use of its investigatory powers; and
 - b) take any necessary action to ensure the basis and effectiveness of the GCA's regulatory approach in enforcing the Code is well understood.

Fear of reprisals deterring suppliers from reporting matters to the GCA:

95. The Government was pleased to find that the GCA had been broadly effective in improving supplier and retailer awareness of the Code, the GCA and in improving supplier confidence when raising issues with both designated retailers and the GCA. The Government appreciates that awareness raising is an ongoing process, especially amongst some harder-to-reach groups, such as micro-suppliers.
96. The Government notes that, while there is generally good awareness of the GCA's requirement to treat information from suppliers about non-compliance confidentially, the fear of reprisals from suppliers remains an issue, which may deter some suppliers from reporting matters to the GCA. The Government fully appreciates the GCA's ongoing efforts to address this, including the 'Tell the GCA' confidential reporting platform. The Government encourages the GCA to:
- a) continue considering the concerns of some suppliers about the consequences of raising issues for their businesses; and
 - b) take any necessary action to ensure suppliers' concerns are not preventing the GCA receiving sufficient information to effectively enforce the Code, with particular attention paid to harder-to-reach suppliers.

⁴³ [New approach to ensure regulators and regulation support growth \(HTML\) - GOV.UK](#)

⁴⁴ [S4 GCA Act 2013](#)

⁴⁵ [GCA Statutory Guidance updated March 2016.pdf](#)

Transparency of GCA activity in practice:

97. The Government further notes comments to the consultation that real-world case studies or anonymised examples could help reassure suppliers that disputes are resolved fairly. The Government appreciates this is challenging to deliver in practice whilst maintaining anonymity, especially when the small numbers involved allow parties to be more easily identified. The Government encourages the Adjudicator to:

- a) consider the concerns of stakeholders requesting practical examples; and
- b) ensure that suitable information is available to support the GCA's purpose of enforcing and encouraging compliance with the Code.

Term of Reference 2: whether it would be desirable for the Secretary of State to exercise their Order-making powers contained in Section 9(6) and Section 15(11) of the Act.

98. Section 9(6) and section 15(11) Order-making powers allow the Secretary of State to amend the maximum fine that the GCA can impose following an investigation and to limit the information that the Adjudicator can consider when deciding whether to launch an investigation.⁴⁶

99. Respondents generally agreed that the possibility of a financial penalty remains an important deterrent within the GCA's regulatory approach. Some questioned its effectiveness given that no penalty has yet been issued, while others argued that this demonstrated the deterrent was working.

100. Most respondents felt the maximum financial penalty of 1% of all turnover (and not just turnover from a retailer's grocery business) remained appropriate, although some, including most MPs, questioned if it was sufficiently high to be a realistic deterrent, whilst others commented that it was disproportionately large. Several noted that the lack of previous penalties suggested no need to increase it. Some supported periodic review to ensure the level remains proportionate and effective. A few designated retailers suggested refining the calculation, for example basing it on UK turnover, restricting it to grocery turnover, or using profit rather than turnover given the sector's low margins.

101. Most respondents also opposed the Secretary of State making an order specifying the information the GCA may consider in deciding whether to carry out an

⁴⁶ The Groceries Code Adjudicator Act 2013 allows the Secretary of State, following a review, to insert a new section into the Act which would state that, in deciding whether to carry out an investigation the Adjudicator may consider only—

- (a) information provided by a supplier;
- (b) information that is publicly available;
- (c) information provided by a person who obtained the information at a time when the person was a worker employed by the retailer in question or a company in the same group;
- (d) information provided by the retailer in question about whether it has complied with a recommendation made under section 7 (i.e. following an investigation)

investigation. The GCA and many stakeholders highlighted the importance of not limiting the information the GCA may consider stressing the importance of allowing the GCA to use intelligence from a wide range of sources—particularly where suppliers fear being identified. Others, however, sought greater clarity and transparency around the criteria and information the GCA considers when launching investigations, noting that uncertainty can affect both suppliers and retailers.

The Government’s conclusions on whether it would be desirable for the Secretary of State to exercise their Order-making powers contained in Section 9(6) and Section 15(11) of the Act

102. The Government has reviewed responses to the consultation and continues to believe that the current calculation of the maximum financial penalty the GCA can issue of 1% of all turnover is appropriate and gives the Adjudicator significant scope to impose an appropriate financial penalty.

103. The Government also sees no case to restrict the information which GCA can consider before deciding whether to launch an investigation as set out in s.15(13) of the Groceries Code Adjudicator Act. The Government continues to believe that the Adjudicator should not be limited by the information he can take into account when considering an investigation. The Government also notes that as an investigation is a potentially significant regulatory intervention, it is right that it is based on evidence or intelligence of non-compliance. It is also appropriate that, as required by the Act, the grounds for undertaking an investigation are set out in guidance issued by the GCA to ensuring transparency in the GCA’s decision-making approach.

Additional questions asked about whether the current model of the GCA is still effective, the GCA’s remit in relation to the Agricultural Supply Chain Adjudicator (ASCA) and parts of the supply chain not covered by either the Groceries Code or Fair Dealings Regulations which have a negative impact on grocery suppliers

Current GCA model and potential consolidation with another public body

104. The majority of consultation respondents considered the current GCA model to be effective and supported its continuation in its present form. Key strengths identified included the GCA’s independence from Government and its funding through a levy rather than general taxation. Most respondents opposed consolidating the GCA with another public body, citing concerns that such a move could dilute its focus, reduce effectiveness, and undermine its established reputation within the industry.

105. Some respondents acknowledged that, if managed carefully, consolidation with another independent regulator could enhance data sharing, strategic enforcement, and the ability to address systemic unfairness. However, even among these views, there was a preference for strengthening the existing GCA model rather than

merging it with another organisation. There was also recognition that the GCA's current focus on direct suppliers may be outdated given the complexity of today's supply chains, and some suggested expanding its remit.

106. Recent Parliamentary debates and the EFRA Select Committee's 2025 fairness in the food supply chain inquiry echoed calls for increased funding, additional staff, and an expanded remit to cover indirect suppliers and intermediaries. An Early Day Motion in June 2025⁴⁷ further advocated for merging the GCA and ASCA under a single regulator with enhanced powers and resources. The GCA's response highlighted significant improvements in Code compliance since 2014⁴⁸, attributing this progress to its operational independence, clear focus, and cost-effective approach funded by designated retailers.

GCA's remit in relation to the ASCA

107. Consultation responses showed varying levels of understanding regarding the relationship between the GCA and ASCA, partly due to ASCA only having been established in 2024. While the theoretical distinction between the two Adjudicators was generally recognised, respondents expressed uncertainty about how their respective regimes interact in practice, particularly in cases where designated retailers are subject to both sets of regulations - these retailers were already subject to Code and GCA jurisdiction, but are now in scope of Fair Dealings Regulations and ASCA jurisdiction if directly supplied by sellers subject to that regime. Concerns were raised about inconsistencies between the regimes and a lack of clarity over which would take precedence in the event of a conflict.

108. Additional feedback highlighted the complexity of supply chains and the risk of regulatory fragmentation with separate Adjudicators, potentially weakening overall oversight. Respondents requested clearer guidance on the respective remits and practical scenarios involving overlap, as well as improved collaboration and information sharing between the GCA and ASCA to prevent regulatory gaps and duplication. These points were also reflected in the EFRA Select Committee's 2025 fairness in the food supply chain inquiry.

109. Some stakeholders, especially those focused on retail, noted that the ASCA fell outside their usual scope and therefore did not comment in detail. Nine respondents did not answer this question at all. The Adjudicator confirmed that he did not believe the GCA's effectiveness had been impacted by the ASCA's establishment and emphasised the GCA's ongoing cooperation with ASCA and Defra officials to ensure clear communication, information sharing, and stakeholder understanding of the respective regimes.

Parts of the supply chain not covered by either the Groceries Code or the Fair Dealings Regulations which have a negative impact on grocery suppliers

⁴⁷ [Farmers, growers and the supermarket supply chain](#)

⁴⁸ Average overall perceived compliance score across the Retailers being 93% in 2025 compared to 73% in 2014

110. Consultation responses revealed concern about unregulated parts of the supply chain across several respondent categories, but especially from trade associations, charities/social enterprises and suppliers/supplier representative groups. Specific concerns mentioned included indirect supplier vulnerability, pressure cascading through supply chains, direct suppliers holding increasing power over primary producers, exploitative financial arrangements and poor purchasing practices.

111. The vulnerability of smaller retailers at the hands of large suppliers was also raised as well as concern over the treatment of workers in the food industry.

Indirect suppliers, intermediaries and supply chain complexity

112. As the Groceries Code applies only to direct suppliers of the 14 designated retailers, it excludes indirect suppliers such as most primary producers, farmers, packhouses, and processors operating through intermediaries. The Fair Dealings Regulations, enforced by the ASCA, are being implemented sectorally. As of March 2025, only the Milk Regulations⁴⁹ had partially come into force. Many respondents identified a significant protection gap for indirect suppliers, noting that pressures and practices from designated retailers affect the broader supply chain.

113. Some respondents reported designated retailers re-structuring supply chains by introducing intermediaries to circumvent the Code, increasing risks for indirect suppliers who lack Code or Fair Dealings protection. The Adjudicator noted that, while issues with intermediaries in some supply chains had been identified and discussed with designated retailers, he had not identified any evidence of retailers deliberately using intermediaries with the intention of circumventing the Code and had therefore not recommended any Code changes to the CMA.

114. Further concerns mentioned included exploitative financial arrangements such as fixed-price contracts that lack inflation protection or set prices below production costs. Others highlighted restrictions on sales, which limit farmers' ability to seek fairer prices by obliging them to sell exclusively to certain buyers or middlemen. Additionally, several responses described poor purchasing practices such as short-notice changes to order volumes or cancellations, which force small-scale producers to absorb the associated costs.

115. Consultation responses further mentioned some designated retailers reducing the number of direct suppliers they deal with, resulting in fewer direct suppliers gaining increased leverage over primary producers, especially when buying the entirety of a retailer's needs for a product range. In some cases, these direct suppliers had adopted purchasing practices similar to those the Code was designed to prevent. The 2025 GCA survey⁵⁰ also noted that rationalisation and consolidation were becoming more prominent in the groceries sector, with retailers increasingly focused on efficiency and streamlined operations.

⁴⁹ [The Fair Dealing Obligations \(Milk\) Regulations 2024](#) came into force for new contracts on 09.07.24 and to all existing contracts from 09.07.25. [The Fair Dealing Obligations \(Pigs\) Regulations 2025](#) came into force on 13.08.25

⁵⁰ [YouGov slides - GCA Annual conference 2025.pdf](#)

Small retailers including designated retailers

116. Smaller designated retailers highlighted specific issues when dealing with some large suppliers who hold greater bargaining power. An example provided was large suppliers leveraging the Code during commercial negotiations to impose short notice cost price increases accompanied by threats on smaller designated retailers. Smaller designated retailers felt that while they were bound by the Code, they were not protected by it (or the Fair Dealings Regulations), in contrast to the large suppliers who receive Code protection, putting them in an even stronger negotiating position.
117. Undesignated smaller retailers also raised concerns about large suppliers abusing their market position through anti-competitive practices and unilateral demands. Additional feedback highlighted poor practices by large buyers, such as last-minute changes to order volumes, prices, or delivery schedules, which negatively impact farmers and growers through intermediaries.

Suggestions offered by consultation responses

118. Some respondents recommended expanding regulatory oversight to the entire supply chain, aligning the remits of both the GCA and ASCA. The 2019 EU Unfair Trading Practices Directive was cited as a potential model for a unified supply chain regulator. However, designated retailers and their groups advised against extending the Code without further investigation.
119. A House of Commons Early Day Motion⁵¹ in June 2025 further called for the Government to bring GCA and ASCA together, with strengthened powers and resources. The motion highlighted farmers and overseas exporters, who are not directly covered by the Code, being subjected to unfair trading practices by large UK corporate buyers as 'risks and costs are passed along the supply chain where many unfair and abusive behaviours remain masked by a climate of fear or remain unchecked'. It argued that maintaining two separate regulators risked fragmenting and weakening oversight, and advocated for a central regulator with strengthened authority over production, delivery, and payment issues. This view was echoed by food businesses and farming campaigners, who met MPs and Peers at the House of Commons in September 2025.

No unfair practices in the unregulated supply chain

120. A minority of consultation responses indicated there were no unfair contractual practices in supply chain segments not covered by the Groceries Code or Fair Dealings Regulations. Reasons included the recent implementation of the Fair Dealings Regulations for Milk and the need for regulatory stability to allow contractual relationships to adapt to sector challenges. Some respondents suggested that concerns could be better addressed through collaboration, negotiation, or existing legal mechanisms, rather than expanding regulation. Others considered current regulations sufficiently comprehensive across the supply chain.

⁵¹ [Farmers, growers and the supermarket supply chain](#)

121. Regarding intermediaries or consolidators, one response noted that their use often enabled smaller producers to access larger retailers without the complexity and resource demands of arranging direct supply arrangements.

122. The EFRA Select Committee's 2025 inquiry identified vulnerabilities in the mid-supply chain, particularly affecting small food processors who remain exposed to financial risks, including the threat of administration. The inquiry also highlighted the creation of intermediaries intended to circumvent the Groceries Code and Fair Dealing Regulations, leaving indirect suppliers, such as small farms and primary producers, unprotected, especially as Fair Dealings Regulations only applied to the milk sector at that time. Additionally, concerns were raised about the lack of protection for the food service and manufacturing sector, which supplies half of the UK's food.⁵² The Committee further noted risks associated with departmental fragmentation and a siloed approach between the GCA (Department for Business and Trade) and the ASCA (Defra), with no formal mechanism for information sharing between these bodies.

123. The GCA's response to the EFRA Select Committee supplemented evidence previously provided to the Committee in 2023. The Adjudicator emphasised that, although the Groceries Code applies only to direct suppliers of designated retailers, he had engaged with suppliers throughout the entire supply chain, which he considered essential to anticipate issues relevant to the Code. This included proactive engagement with grocery suppliers and their representatives, including food producers, to ensure their concerns were understood.

124. The Adjudicator also noted awareness of designated retailers adjusting commercial strategies through the use of consolidators and intermediaries, highlighting that today's indirect supplier may become tomorrow's direct supplier.⁵³ Furthermore, the Adjudicator explained that he worked to improve designated retailers' understanding of producer challenges. This included discussing their plans to enhance knowledge of crop growing cycles, suggesting improved training for buyers and extending the length of time buyers spend in product categories to improve their knowledge of suppliers concerns and challenges.

The Government's conclusions on the additional questions

125. The Government acknowledges that the Review found varying levels of understanding between the GCA and ASCA's remits and some confusion about how the two regimes interact. The Government also acknowledges stakeholder concerns around supply chain complexity and changes in supply chain practices over the last decade, including increased supplier rationalisation and consolidation.

⁵² committees.parliament.uk/writtenevidence/122922/html/

⁵³ committees.parliament.uk/writtenevidence/135304/pdf/

126. The Government does not believe that this review provides sufficient evidence to support establishing a single supply chain regulator. Transferring departmental responsibility for the GCA to Defra will, however, strengthen links between the GCA and the ASCA and support a more coherent approach to supply chain regulation. Having both Adjudicators in one department will further streamline stakeholder engagement, Ministerial oversight and Parliamentary accountability. The Government will also continue the roll out of its Fair Dealings Regulations and will keep the wider framework for supply chain fairness under review.

Annex A: Terms of Reference

Term of Reference 1

Consider the GCA's performance from 1 April 2022 to 31 March 2025.

This will in particular:

- Consider how much the GCA's powers have been exercised and in what circumstances; and
- Assess how effective the GCA has been in enforcing the Groceries Code ('the Code').

Term of Reference 2

Consider whether it would be desirable for the Secretary of State to exercise their Order-making powers contained in Section 9(6)⁵⁴ and Section 15(11) of the Act.

This will consider whether:

- To make an Order setting out the information that the GCA may consider when deciding whether to investigate;
- To amend or replace the Groceries Code Adjudicator (Permitted Maximum Financial Penalty) Order 2015.

Consultation process

The following will be consulted:

- (a) The GCA;
- (b) The Competition and Markets Authority;
- (c) The retailers mentioned in Article 4(1)(a) and (b) of the Groceries Supply Order⁵⁵;
- (d) One or more persons representing the interests of suppliers;
- (e) One or more persons representing the interests of consumers; and
- (f) Any other person (see explanatory notes below).

Next steps

As soon as practicable after the consultation period, the Secretary of State will:

- Publish a report of the findings of the GCA review; and
- Lay a copy of the report before Parliament.

Explanatory notes

In preparing these terms of reference we have fulfilled the requirements of the Act.

Section 15(8) of the Act sets out the persons that must be consulted as part of the review. Paragraph (g) of section 15(8) says that includes any other person the Secretary of State thinks appropriate. The Secretary of State has not identified any other specific person or persons he wishes to consult but welcomes contributions from any interested person.

⁵⁴ Note section 15 does not require the review to consider the powers in section 9(6) of the Act but section 15(6) provides that the review may consider this.

⁵⁵ At the date of this document these retailers are: Asda Stores Ltd; Co-operative Group Ltd; Marks & Spencer plc; Wm Morrison Supermarkets Ltd; J Sainsbury plc; Tesco plc; Waitrose Ltd; Aldi Stores Ltd; Iceland Foods Ltd; Lidl GB Ltd; B&M European Value Retail plc; TJ Morris Ltd, trading as Home Bargains; Ocado Retail Ltd; and Amazon.com, Inc.

Annex B: The Code and the GCA

The Groceries Code

In May 2006 the Competition Commission⁵⁶(CC) launched a Market Investigation into the UK Groceries market in response to long-standing concerns about practices of the large retailers (supermarkets). The CC published its findings in 2008⁵⁷ stating that, while the sector was broadly competitive, some large retailers were transferring excessive risk and unexpected costs to their direct suppliers by using their buyer power. The CC considered that this might have an adverse effect on suppliers' ability to invest and innovate which could ultimately reduce choice and/or increase prices for consumers. As a result of these findings, the CC issued the Groceries (Supply Chain Practices) Market Investigation Order 2009⁵⁸ ('the Order') containing a new strengthened code of practice for groceries retailers' dealings with their direct suppliers i.e. The Groceries Supply Code of Practice⁵⁹ ('the Code').

Large retailers were given some time to set up a voluntary Ombudsman but, as this self-regulatory approach did not progress, the Groceries Code Adjudicator (GCA) was established under the Groceries Code Adjudicator Act 2013 ('the Act')⁶⁰.

The Groceries Code Adjudicator

The GCA is an independent regulator sponsored by the Department for Business and Trade. It was established under the Act. The purpose of the GCA is to monitor and enforce the Code⁶¹.

The first Groceries Code Adjudicator, Christine Tacon CBE served from June 2013 until October 2020. Mark White became the second Groceries Code Adjudicator on 31 October 2020, appointed by the Secretary of State for a four-year term and reappointed for a second term of 3-years starting October 2024. The GCA is wholly funded by a levy on the retailers which for 2025/26 is £2.2 million. Mark White works four days per week and has a small team made up of public sector secondees.

The Remit

The Code applies to the fourteen largest UK grocery retailers⁶² ('large retailers') with UK annual groceries turnover of more than £1 billion and which are designated in writing by the CMA as a Designated Retailer. Designated Retailers must incorporate the Code into their supply agreements with their direct suppliers. It imposes an over-arching principle of fair dealing and includes specific provisions governing the variation of supply agreements and terms of supply; the timing of payments; payments for marketing costs and the funding of promotions; and payments as a condition of being a supplier.

⁵⁶ In April 2014, most of the functions of the Competition Commission were transferred to the Competition and Markets Authority.

⁵⁷ www.gov.uk/cma-cases/groceries-market-investigation-cc

⁵⁸ <https://www.gov.uk/government/publications/groceries-supply-chain-practices-market-investigation-order>

⁵⁹ <https://www.gov.uk/government/publications/groceries-supply-code-of-practice>

⁶⁰ <https://www.legislation.gov.uk/ukpga/2013/19/contents>

⁶¹ <https://www.gov.uk/government/publications/groceries-supply-code-of-practice>

⁶² These are – Amazon, Aldi, ASDA, B&M, Co-op, Marks and Spencer, Iceland, Lidl, Morrisons, Ocado, Sainsburys, Tesco, Waitrose and Home Bargains. Ocado and B&M were added to the list in November 2018, Home Bargains was added to the list in September 2019 and Amazon was added on 1 March 2022.

The Code does not directly regulate the actual prices paid by the large retailers to their direct suppliers. In addition, the Code does not cover disputes between the large retailers and consumers, which are regulated by consumer protection legislation.

Duties

The GCA is responsible for monitoring and encouraging compliance with and enforcing the Code. Under the Code the large retailers are obliged to deal with suppliers to ensure fairness across a range of supply chain practices. These include making payments on time; no variations to supply agreements without notice; compensation payments for forecasting errors; no charges for shrinkage or wastage; restrictions on listing fees, marketing costs and delisting. The GCA website includes a list of issues covered by the Code⁶³.

Statutory functions

The statutory functions of the GCA, set out in legislation, are to:

- provide advice and guidance to both suppliers and the large retailers on matters relating to the Code;
- arbitrate in disputes between suppliers and the large retailers [or appoint someone else to arbitrate];
- investigate issues to ascertain whether there has been a breach of the Code;
- impose sanctions and other remedies for breaches of the Code; and
- to prepare and publish an annual report on the GCA's activities.

Information sources

Suppliers, trade associations and other representative bodies are encouraged to provide the GCA with information and evidence about how the large retailers are treating their direct suppliers. All information received is dealt with on a confidential basis and the GCA has a legal duty to preserve anonymity [unless the person sharing the information gives consent for disclosure, disclosure is required for the purpose of an EU obligation, disclosure is required under the rules of a court or a court order, for the purposes of legal proceedings of any description].

Powers

Investigative powers

Under the Act, the GCA may launch an investigation if the GCA has reasonable grounds to suspect that a large retailer has:

- (a) broken the Code; or
- (b) failed to follow a recommendation issued by the GCA following a previous investigation.

Enforcement powers

If a breach of the Code is found following investigation, the GCA can take one or more of the following enforcement measures:

- (a) make recommendations;
- (b) require large retailers to publish details of any breach; and
- (c) impose a fine.

⁶³ <https://www.gov.uk/government/organisations/groceries-code-adjudicator>

Role of Government

The GCA is operationally independent of Government.

The Secretary of State for the Department of Business and Trade is responsible for appointing the GCA. The current GCA was appointed following an open competition in accordance with Cabinet Office guidelines on public appointments. The Secretary of State is also required to approve the GCA's annual levy. The GCA must submit a levy proposal and supporting business case in advance to the Secretary of State. The Secretary of State will consider the proposal and write to the GCA confirming whether he has approved the levy, and whether he has done so in full or in part. Once in receipt of this approval, the GCA may invoice the retailers for their share of the levy. Non-payment of the levy is recoverable by the GCA as a civil debt.

The Groceries Code Adjudicator Act 2013 also provides powers for the Secretary of State to transfer the GCA's functions to a public body or abolish the GCA. The Secretary of State can use the findings of the GCA Review to consider whether and to what extent it is necessary to exercise these powers.

Annex C: Breakdown of responses to public consultation

Statutory Respondents listed in the Groceries Code Adjudicator Act 2013.

- the Groceries Code Adjudicator (GCA);
- the Competition and Markets Authority (CMA);
- retailers subject to the Code;
- one or more persons representing the interests of suppliers;
- one or more persons representing the interests of consumers; and
- any other person the Secretary of State thinks appropriate.

Responses broken down by sector

- large retailers (i.e. those designated under the Code/designated retailers) – 11
- direct suppliers – 7
- representative organisations – 19
 - of which there were 13 trade associations; 4 charity/social enterprise groups, 2 supplier representative groups
- consumers/consumer groups/individuals – 4 (some in the charity/social enterprise also answered consumer-specific questions)
- Other - 14
 - including services/consultants, the CMA, and the GCA
 - MPs
 - individuals
 - campaigners
 - academics

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