GROCERIES MARKET INVESTIGATION (CONTROLLED LAND) ORDER 2010: ASSESSMENT OF ALDI STORES LIMITED, LIDL GREAT BRITAIN LIMITED AND LIDL NORTHERN IRELAND LIMITED

Provisional decisions

7 August 2026

Competition & Markets Authority

Website: www.gov.uk/cma

The CMA has excluded from this published version of the provisional decisions information which the CMA considers should be excluded having regard to the three considerations set out in section 244 of the Enterprise Act 2002 (specified information: considerations relevant to disclosure). The omissions are indicated by [✀]. Some numbers have been replaced by a range. These are shown in square brackets. Non-sensitive wording is also indicated in square brackets.

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1. Summary

1.1 The Groceries Market Investigation (Controlled Land) Order 2010 (the **Order**) was introduced following the Competition Commission's (**CC**) 2008 groceries market investigation. The Order's purpose is to remedy the adverse effect on competition found by the CC in relation to highly concentrated local markets for the supply of groceries and the control of land in highly concentrated local markets by incumbent retailers. The Order prevents large supermarkets from using certain land agreements to block competitors from opening nearby stores.

1.2 When the Order was made, seven large supermarkets were designated as Large Grocery Retailers (**LGRs**)[1] and required to comply with its terms. The Order provided for the designation of additional grocery retailers as LGRs where they:

(a) operate 'Larger Grocery Stores' throughout either Great Britain or Northern Ireland or both or in a considerable part or parts of the UK;

(b) carry a full range of 'Groceries' for sale at the retail level; and

(c) have an integrated grocery wholesaling function that purchases directly from grocery suppliers.

1.3 The Order makes provision for the designation of additional grocery retailers as LGRs where these criteria are met.

1.4 Aldi and Lidl were not designated as LGRs when the Order was introduced. They were instead considered to be Limited Assortment Discounters (**LADs**), reflecting their then more limited product ranges and low-price business model.[2] The Order specifies that a retailer is a LAD where it sells a significantly more limited range of groceries than an LGR at a low price.

1.5 The Competition and Markets Authority (**CMA**) is now assessing whether market developments since 2010 mean that each of Aldi Stores Limited (**Aldi**), Lidl Great Britain Limited (**Lidl GB**) and Lidl Northern Ireland Limited (**Lidl NI**) now satisfy the criteria for designation as LGRs in the Order, and should therefore be subject to the Order's limitations on the use of certain land agreements to block competitors from opening nearby stores. Evidence provided by each of Aldi, Lidl GB and Lidl NI to the CMA in 2025 demonstrated that a proportion of each of their land agreements contained the type of restrictions which would be subject to the Order.[3]

[1] Asda Stores Limited, Co-operative Group Limited, J Sainsbury plc, Marks and Spencer plc, Tesco plc, Waitrose Limited, and Wm Morrison Supermarkets Limited. See also paragraph 3.3 and Appendix 3.1 of the CC's Final Report entitled 'The supply of groceries in the UK market investigation', 30 April 2008 (**Final Report**).
[2] Final Report, paragraph 3.3.
[3] See Appendix A, paragraph 1.1 for further detail.

1.6 The CMA has used its statutory powers to gather information from Aldi, Lidl GB and Lidl NI as well as from all seven LGRs.[4] The CMA also launched a public Invitation to Comment, inviting views on whether these retailers meet the designation criteria.

1.7 Our provisional view, based on the evidence gathered to date, is that Aldi, Lidl GB and Lidl NI are no longer LADs for the purposes of the Order. Although each retailer continues to sell groceries at a low price, we provisionally consider that they no longer sell a significantly more limited range of groceries than LGRs. We provisionally find that the gap between each of their respective ranges and those of LGRs has narrowed since the CC's market investigation, notwithstanding their lower overall stock keeping unit (**SKU**) count than existing LGRs. We also provisionally find that each now offers a broad coverage across the categories of goods defined as 'Groceries' in the Order, can serve as a destination for a main weekly shop for a substantial number of customers and exerts a material competitive constraint on LGRs.

1.8 Based on our work so far, our provisional view is that each of Aldi, Lidl GB and Lidl NI should be designated as LGRs for the purposes of the Order. In particular, we provisionally find that:

(a) Each of Aldi, Lidl GB and Lidl NI operates 'Larger Grocery Stores' across a sufficient geographic area to meet the criterion in the Order. Aldi and Lidl GB each operate more than 1,000 stores across Great Britain, with a large majority above the 1,000 square metre (**sqm**) threshold. Lidl NI operates more than 40 stores across Northern Ireland, a large majority of which exceed the 1,000 sqm threshold.

(b) Each of Aldi, Lidl GB and Lidl NI now carries a full range of 'Groceries' for sale at the retail level. Although their ranges remain largely focussed on own-brand products, each stocks goods across all major grocery categories. The remaining differences from existing LGRs relate to the depth of choice within categories, particularly branded products and specialist lines, rather than the absence of core grocery categories. The CMA also places weight on evidence that existing LGRs benchmark against Aldi, Lidl GB and Lidl NI, regard them as competitive constraints and, in the case of Aldi and Lidl GB, operate price-matching schemes in response. Third-party submissions broadly reinforce that Aldi, Lidl GB and Lidl NI are now all widely regarded as mainstream competitors for regular grocery shopping, even though their business models remain distinctive.

(c) Each of Aldi, Lidl GB and Lidl NI has an integrated grocery wholesaling function that purchases directly from suppliers, notwithstanding that some

[4] Under s.174 of the Enterprise Act 2002 (**EA02**).

procurement is organised through wider corporate group structures or, in Aldi's case, [✂] SKUs [✂] are procured via intermediaries.

1.9 We therefore propose to designate each of Aldi, Lidl GB and Lidl NI as a Large Grocery Retailer in accordance with Article 3(3) of the Order.

Views on proposal to designate each of Aldi, Lidl GB and Lidl NI as an LGR under the Order

1.10 These are not the CMA's final decisions. In accordance with the Order, each of Aldi, Lidl GB and Lidl NI has an opportunity to comment on the proposal to designate each of them as an LGR.[5] The CMA is also inviting views from all interested stakeholders on its proposal to designate each of Aldi, Lidl GB and Lidl NI as an LGR before it makes its final decisions. All respondents should provide their views, supported with relevant evidence where possible, in writing to the CMA by email to: CLO2026@cma.gov.uk by **5pm on Monday 7 September 2026.**

1.11 The CMA will consider all submissions received in response to these provisional decisions, together with any further evidence, before deciding whether its provisional decisions should be altered.

1.12 The CMA intends to publish all written submissions received. Please ensure that any submission provided to the CMA that contains any confidential material is accompanied by a non-confidential version, which the CMA will publish on its website.

[5] Order, Article 3(3).

2. Introduction

The Competition Commission's 2008 Final Report

2.1 Following a reference from the Office of Fair Trading (**OFT**) in May 2006, the CC investigated the supply of groceries. In its Final Report, published on 30 April 2008, the CC identified adverse effects on competition in several areas. These included high levels of concentration in local markets for the supply of groceries by mid-sized and larger grocery stores, and the use by incumbent retailers of land controls restricting entry in highly concentrated local markets.

2.2 In defining the relevant product market, the CC focussed on two key variables that it considered captured many aspects of the retail offer of any given grocery store:[6] store size and store fascia.

(a) **Store size**: having considered a range of factors,[7] the CC identified a number of store size groups including larger grocery stores[8] ; and mid-sized[9] stores.[10]

(b) **Store fascia**: the CC considered that store fascia signals to customers the range and type of products available. The CC noted that was particularly important for fascias offering a limited range as part of a deliberate business model, independent of store size.[11] When assessing store fascia, the CC also considered grocery retailers' monitoring of their competitors.[12] Stores operated by large grocery retailers were included within the same product market (subject to store size distinctions). Other grocery stores offering a full range of grocery products were considered effective substitutes (again, subject to the store size-based delineation of the product market).[13]

2.3 As part of this analysis, the CC considered that Marks and Spencer plc (**M&S**) stores, despite carrying fewer SKUs than large grocery retailers of a comparable size, should be regarded as in the same product market as stores belonging to large grocery retailers. The CC found that although M&S had 'fewer SKUs within

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6 Final Report, paragraph 4.17.
7 Namely, the extent to which the number of SKUs in a store varies with store size, the presence of different food counters and amenities in stores of different sizes, the store size distribution of grocery stores in the UK as well as within the portfolios of individual grocery retailers, consumer shopping patterns in relation to different store sizes, a model of consumer demand for groceries, and entry analysis. Final Report, paragraphs 4.20 to 4.62.
8 Meaning stores larger than 1,000 to 2,000 sqm. As the precise delineation of the product market by store size differed across local geographic markets, for the purposes of analysing collectively a large number of local markets, the CC in many cases used a 1,400 sqm threshold for larger grocery stores. Final Report, paragraphs 13 and 4.138.
9 Meaning stores between 280 sqm and 1,000 to 2,000 sqm.
10 The CC delineated the product market as follows: (i) larger grocery stores; (ii) mid-size stores and larger grocery stores; and (iii) all grocery stores (ie convenience stores (stores below 280 sqm), mid-sized and larger grocery stores). Final Report, paragraphs 4.63 and 4.135.
11 Final Report, paragraph 4.64.
12 Final Report, paragraphs 4.66 to 4.86.
13 When assessing store fascia, the CC also considered the extent to which revenues of incumbent stores are affected by entry of new stores of different fascias (Final Report, paragraphs 4.69 to 4.73), and results from modelling of consumer demand for groceries (Final Report, paragraph 4.74).

each product category' and only stocked own-label products, it offered 'the same broad product range as large retailers'.[14] The CC therefore rejected arguments that SKU count alone excluded M&S as an effective competitor.[15]

2.4 The CC also rejected submissions from Co-operative Group Limited (**Co-op**) that Co-op's larger stores lacked sufficient product range to be regarded as effective substitutes for larger grocery stores. It concluded that Co-op should be included in the product market as the relationship between range and store size for Co-op was similar to the relationship between range and store size for Asda Stores Limited (**Asda**), Wm Morrison Supermarkets plc (**Morrisons**) and Tesco plc (**Tesco**).[16]

2.5 Conversely, the CC excluded Aldi and Lidl[17] from the same product market as large grocery retailers.[18] The CC found that their limited product range (typically fewer than 1,000 products[19] – as compared with around 5,000 to 10,000 for large grocery retailers) meant they were not close substitutes.[20] The CC instead classified Aldi and Lidl as Limited Assortment Discounters (LADs).[21]

2.6 As noted above, the CC found adverse effects on competition arising in several areas, including high levels of concentration in local markets for the supply of groceries by mid-sized and larger grocery stores and from incumbent retailers' use of land control measures in highly concentrated local markets. These measures included restrictive covenants (that is restrictions typically imposed on the sale of freehold land limiting its future use) and exclusivity arrangements (where landowners or developers grant a grocery retailer exclusive rights and agree not to allow another grocery retailer to operate on site(s) they own). The CC found that such measures acted as a barrier to entry in highly concentrated local markets for mid-sized and larger grocery stores by limiting access to potential sites.[22]

2.7 The CC concluded that a package of remedies would be effective and proportionate to address the identified adverse effect on competition:[23]

[14] Final Report, paragraph 4.77. See also the analysis of M&S's product range at Appendix 3 to the Final Report, paragraph 13. The CC's entry analysis also provided positive grounds for inclusion of M&S stores in the same product market as stores belonging to large grocery retailers.
[15] Final Report, paragraph 4.77.
[16] Final Report, paragraph 4.78.
[17] At the time of the Final Report, Lidl UK GmbH operated its business on a UK-wide basis. Since then, its UK operations have been restructured such that Lidl GB operates in Great Britain, and Lidl NI operates in Northern Ireland. The term **Lidl** is used to describe both entities' operations across Great Britain and Northern Ireland. The CC also considered Netto as part of this analysis as one of the 'three major LADs in the UK'. Netto no longer operates in the UK.
[18] Final Report, paragraphs 4.80 to 4.81.
[19] The CC also found (Final Report, paragraph 3.3) that each of Aldi and Lidl carried in the region of 1,000 to 1,400 product lines in stores ranging from 500 to 1,400 sqm and noted that stores of a similar size operated by a large grocery retailer generally carried around 5,000 products.
[20] The CC's entry analysis also showed that Aldi and Lidl stores were not close substitutes for the stores of large grocery retailers. While the CC found that stores of Aldi and Lidl should not be in the same product market as stores belonging to large grocery retailers when the starting point for a SSNIP test is stores operated by large grocery retailers, it did find a constraint on Aldi and Lidl by mid-size and larger stores of large grocery retailers. Final report, paragraphs 4.80 to 4.81.
[21] Final Report, paragraph 3.3.
[22] Final Report, paragraphs 7.88 to 7.122, and 10.9 to 10.10.
[23] Final Report, paragraphs 11.138 and 11.183.

(a) **Investigated restrictions**: Where the CC had assessed specific restrictive covenants and found an adverse effect on competition, large grocery retailers were required to release those restrictive covenants.[24] They were also prohibited from enforcing (or seeking the enforcement of) specific existing exclusivity arrangements where the CC had found an adverse effect on competition after five years from the date of the Final Report.[25]

(b) **Non-investigated restrictions**: In relation to restrictions which the CC had not investigated, large grocery retailers were required to release existing restrictive covenants and refrain from enforcing (or seeking enforcement of)[26] existing exclusivity arrangements affecting land in highly concentrated local markets where such measures restricted grocery retailing or had equivalent effect. A competition test would determine whether a local market was highly concentrated. To be released from non-investigated restrictions, owners of land subject to a restrictive covenant could apply to the OFT (now the CMA) for the competition test to be applied. In respect of exclusivity arrangements, such an application could be made by any person who agreed to give a large grocery retailer exclusivity or any company wishing to develop a grocery retail store on the site covered by an exclusivity arrangement.[27]

(c) **Future conduct**: Large grocery retailers were prohibited (with limited exceptions) from imposing new restrictive covenants that may restrict grocery retailing or have equivalent effect.[28] They were also prohibited from enforcing (or seeking the enforcement of) new exclusivity arrangements after five years from the opening of the relevant grocery store.[29]

2.8 The CC concluded that the remedies on restrictive covenants and exclusivity arrangements should, in line its market definition in its Final Report, apply to all large grocery retailers.[30] The CC considered whether to limit application of these remedies to those large grocery retailers explicitly identified in the Final Report. While this approach would provide certainty and clarity, the CC recognised that the composition of large grocery retailers under its market definition could change over time.

2.9 The CC therefore concluded that, for the remedies to remain effective, they should apply to all retailers meeting the definition of large grocery retailers. It further

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[24] Final Report, paragraphs 11.150 to 11.153.
[25] Final Report, paragraphs 11.191 to 11.194.
[26] After the longer of (a) five years from the date of the Final Report or (b) five years from the date the grocery retail store was opened.
[27] Final Report, paragraphs 11.155 to 11.159 and paragraphs 11.195 to 11.197.
[28] Final Report, paragraphs 11.167 to 11.182.
[29] Final Report, paragraphs 11.205 to 11.212.
[30] Final Report, paragraphs 11.154, 11.172, 11.198 and 11.214.

provided that the OFT could revise the list of such retailers as appropriate over time, having regard to the CC's approach to market definition.[31]

The 2010 Order

2.10 The CC made the Order on 10 August 2010, to give effect to the remedies set out in the Final Report.[32]

2.11 From the date of the Order, the following seven retailers were designated as LGRs described in Schedule 1 of the Order:

(a) Asda Stores Limited (Asda);

(b) Co-operative Group Limited (Co-op);[33]

(c) Marks and Spencer plc (M&S);

(d) Wm Morrison Supermarkets plc (Morrisons);[34]

(e) J Sainsbury plc (**Sainsbury's**);

(f) Tesco plc (Tesco); and

(g) Waitrose Limited (**Waitrose**).

2.12 In accordance with the CC's conclusions in the Final Report regarding effectiveness of its remedies, the Order provides for the designation of additional grocery retailers as LGRs[35] where specified criteria are met. Since 2010, neither the OFT, nor the CMA, has designated any additional grocery retailers as LGRs under the Order.

2.13 The CMA actively monitors and enforces orders, undertakings, directions and commitments within its remit, including the Order.[36] As part of this role, the CMA is now considering whether each of Aldi, Lidl GB and Lidl NI should be designated as LGRs under the Order.

[31] Final Report, paragraphs 11.154, 11.198 and 11.215.
[32] The CC also made the Groceries (Supply Chain Practices) Market Investigation Order 2009 (the **GSCOP Order**) (Groceries (Supply Chain Practices) Market Investigation Order - GOV.UK) containing a new strengthened code of practice for groceries retailers' dealings with their direct suppliers which is not further considered in this assessment. It also made a number of recommendations, see Final Report, paragraphs 43 to 45 for a summary.
[33] And Midlands Co-operative Society Limited in connection with a specific Restrictive Covenant benefitting one Store.
[34] Wm Morrison Supermarket plc re-registered as a private company in November 2021, under the name of Wm Morrison Supermarkets Limited.
[35] Order, Article 3(3).
[36] Consistent with its duty in s.162 EA02.

The framework for designation

2.14 As noted at paragraph 2.9 above, the CC stated in its Final Report that the list of LGRs could be revised by the OFT over time, as appropriate, having regard to the approach taken to market definition in the Final Report.[37] The purpose of the Order is to remedy, mitigate or prevent the adverse effect on competition identified by the CC in its Final Report in relation to the high levels of concentration in local markets for the supply of groceries by mid-sized and larger grocery stores, and the control of land in highly-concentrated local markets by incumbent retailers.[38]

2.15 The CMA considers that the criteria in the Order for identifying additional LGRs are intended to ensure that the remedies identified by the CC can reflect changing circumstances, thereby supporting the continued effectiveness of the CC's remedies. In particular, the criteria enable the CMA to assess whether a particular Grocery Retailer is sufficiently similar to those which were originally designated as LGRs as to mean that it is appropriate for it to be subject to the same remedy.

2.16 The Order makes provision for designation of additional Grocery Retailers as LGRs if they meet the designation criteria set out at Article 3(4) of the Order, specifically if the Grocery Retailer:

(a) operates Larger Grocery Stores throughout either Great Britain or Northern Ireland or both or in a considerable part or parts of the United Kingdom;

(b) carries a full range of Groceries for sale at the retail level; and

(c) has an integrated grocery wholesaling function that purchases directly from grocery suppliers.[39]

2.17 The Order defines:[40]

a) **'Grocery Retailer'** as 'a person who sells Groceries at the retail level'.

b) **'Groceries'** as 'food (other than that sold for consumption in the store), pet food, drinks (other than those sold for consumption in the store), cleaning products, toiletries and household goods. It excludes petrol, clothing, DIY products, financial services, pharmaceuticals, newspapers, magazines, greetings cards, CDs, DVDs, video and audio tapes, toys, plants, flowers,

[37] Final Report, paragraphs 11.154, 11.198 and 11.215.
[38] And any detrimental effects so far as they have resulted, or may be expected to result from, that adverse effect on competition. Notice of making Controlled Land Order, paragraphs 3 and 12.
[39] These criteria are similar to the description of Large Grocery Retailers in the Final Report, which stated, at paragraph 3.3, that such retailers 'have operations throughout Great Britain and, in some cases, Northern Ireland. These retailers carry a full-range of grocery products and have an integrated wholesaling function that purchases directly from grocery suppliers'.
[40] Order, Article 2(1).

perfumes, cosmetics, electrical appliances, kitchen hardware, gardening equipment, books, tobacco and tobacco products'.

c) **'Larger Grocery Store'** as a 'Grocery Store with a Net Sales Area of more than 1,000 sqm'.

d) **'Grocery Store'** as a 'retail store, a significant proportion of which is devoted to the sale of Groceries, but excludes stores operated by Limited Assortment Discounters and Frozen Food Retailers'. Therefore, a LAD[41] cannot be designated as an LGR.

2.18 Accordingly, to determine whether each of Aldi, Lidl GB and Lidl NI should be designated as LGRs under the Order, the CMA must therefore assess:

(a) Whether each of Aldi, Lidl GB and Lidl NI continues to fall within the definition of a LAD and should therefore remain excluded from scope of the Order; and

(b) If any of Aldi, Lidl GB or Lidl NI do not qualify as a LAD, whether they meet the criteria for designation as an LGR under Article 3(4) of the Order.

Limited Assortment Discounter (LAD)

2.19 As noted above, a LAD is defined as 'a Grocery Retailer which sells a significantly more limited range of Groceries than a Large Grocery Retailer at a low price'.[42] The Order defines an LGR as 'a person designated from time to time as a Large Grocery Retailer in accordance with Article 3'. In applying the definition of a LAD to each of Aldi, Lidl GB and Lidl NI, the CMA has therefore had regard to the retailers already designated as LGRs.

2.20 To be defined as a LAD, a Grocery Retailer must satisfy **both** limbs of the definition. Accordingly, a Grocery Retailer will not be a LAD if it:

(a) offers low prices but does **not** have a significantly more limited range of Groceries than an LGR; or

(b) offers a significantly more limited range of Groceries than an LGR but does **not** do so at a low price.

2.21 The Order does not further define the meaning of 'significantly more limited range of Groceries than a Large Grocery Retailer' or 'at a low price'. In construing these phrases, the CMA has had regard to the purpose of the LADs definition in the Order. That purpose is to exclude stores operated by LADs from the definition of 'Grocery Store' (and therefore from the scope of LGR designation). This reflects

[41] LAD is defined as 'a Grocery Retailer which sells a significantly more limited range of Groceries than a Large Grocery Retailer at a low price'.
[42] Order, Article 2(1).

the CC's finding in the Final Report that, for the purposes of the market investigation, stores operated by LADs were not close substitutes for similarly sized stores of large grocery retailers.[43]

Sells a significantly more limited range of Groceries than a Large Grocery Retailer

2.22 The 'range' limb of the definition requires a comparative assessment. In particular, a LAD must sell a range of Groceries that is '**significantly** more limited' (emphasis added) than an LGR.

2.23 As noted at paragraph 2.21 above, in the Final Report, the CC found that Aldi and Lidl's limited number of products (or SKUs) meant that their stores were not close substitutes for similarly sized LGR stores. The CMA considers SKU count served as a proxy for the breadth of Aldi and Lidl's ranges, given that this assessment appeared in the CC's discussion of 'product range' in the Final Report, and in the broader context of determining whether LAD stores were, for the purposes of the market investigation, substitutable for LGR stores.[44]

2.24 The CMA considers that assessing what is a significantly more limited range of Groceries than an LGR involves an exercise of judgement. The CMA will therefore consider a range of evidence in reaching its decision. The CMA will consider evidence of a Grocery Retailer's product range, including the number of SKUs carried by each of Aldi, Lidl GB and Lidl NI, alongside other evidence on the breadth of each of their ranges, and evidence on the implications of any differences in product ranges as compared to ranges sold by LGRs.

2.25 The CMA will consider the following evidence on Grocery Retailers' ranges:

(a) **The number of SKUs stocked by each of Aldi, Lidl GB and Lidl NI as compared to LGRs in stores of a similar size.**[45] As noted above at paragraph 2.23, SKU counts formed part of the CC's analysis and may provide a broad indicator of range (although do not, on their own, provide a full picture).

(b) **Range strategies and the extent to which each of Aldi, Lidl GB and Lidl NI's product ranges comprise own-brand SKUs compared to LGRs in stores of a similar size.** The CMA considers that this factor contributes to a more comprehensive picture of overall range (see paragraph 2.3).

[43] Final Report, paragraphs 4.80 to 4.81.
[44] Final Report, paragraphs 4.75 to 4.81.
[45] The CMA has compared stores of similar sizes in line with the approach taken by the CC in its Final Report – see paragraph 2.21 above. To compare stores of a similar size, the CMA focussed on stores with a Net Sales Area between 1,000 and 2,000 sqm. The CMA notes that there may still be some differences in Grocery Retailers' average store sizes within this range.

(c) **Material gaps in ranges of each of Aldi, Lidl GB and Lidl NI compared to LGRs in stores of a similar size.** The CMA will consider whether there are any material gaps in the Groceries product ranges of each of Aldi, Lidl GB and Lidl NI compared to LGRs in stores of a similar size. The CMA considers that the absence of entire categories of Groceries is likely to be more significant than a narrower offering within a category.[46]

(d) **The business models of each of Aldi, Lidl GB and Lidl NI.** As noted above at paragraph 2.2, a key aspect of the CC's analysis was the signal conveyed by store fascia as to the range and type of products customers can expect to be available, particularly where a limited range is integral to their business model.

2.26 In assessing evidence on the implications of differences in range, the CMA will consider:

(a) **The ability of customers to conduct their main weekly shop at each of Aldi, Lidl GB and Lidl NI.** The CMA considers that whether customers can complete a main weekly shop (that is, a main regular shop) at a Grocery Retailer is a relevant factor in its assessment of this aspect of the LAD definition.[47] The main weekly shop is an important shopping mission for many customers[48] and the ability to support a main weekly shop is a common feature among the LGRs and helps distinguish them from many other Grocery Retailers. It also indicates that they stock a broad range of products. Accordingly, the CMA considers that where customers can complete their main shop at other Grocery Retailers, this indicates that the range sold by those Grocery Retailers is not 'significantly more limited' than the range sold by LGRs.

(b) **Evidence on the competitive constraint exerted by each of Aldi, Lidl GB and Lidl NI on current LGRs**. The CMA considers that evidence of material competitive constraint exerted by Aldi, Lidl GB or Lidl NI on current LGRs would indicate that they no longer offer a 'significantly more limited range of Groceries' than those LGRs. The CMA will consider, as part of this analysis, the views of Aldi, Lidl GB and Lidl NI, the views of third parties (including

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[46] The CMA will also have regard to the CC's finding in its Final Report that M&S was a large grocery retailer because it carried 'the same broad product range as large retailers' (Final Report, paragraph 4.77; see also Appendix 3.1, paragraph 13) and the CC's conclusion that frozen food stores and specialist grocery stores should not be included in the same product market as stores operated by larger grocery retailers due to their limited range (Final Report, paragraphs 4.82 and 4.83).

[47] The CMA notes that the CC in its Final Report moved away from the shopping mission as the starting point for its consideration of market definition. The CC acknowledged an imperfect match between shopping mission and store size, with the latter operating as the focus for its market definition. The CC did however consider that the scope for customers on a particular type of shopping mission to switch some or all of their expenditure to a different-sized store in response to a price increase (or other deterioration in the retail offer) would be relevant to its assessment (Final Report, paragraph 4.19). For the reasons set out at paragraphs 2.26(a), 5.20 and 5.53, the CMA considers that this factor is a relevant one when assessing the extent of the range sold by a Groceries retailer for the purposes of the Order.

[48] See paragraph 4.38.

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LGRs), market shares of each of Aldi, Lidl GB and Lidl NI, consumer behaviour, and any Groceries benchmarking or price-matching by LGRs to each of Aldi, Lidl GB and Lidl NI.

At a low price

2.27 The ‘price’ limb of the definition also implicitly requires a comparative assessment (that is an evaluation of the relative Groceries prices of each of Aldi, Lidl GB and Lidl NI as compared to LGRs). In its Final Report, the CC found that Aldi’s and Lidl’s business models were based on offering a limited range of grocery products ‘at very competitive prices’.[49]

2.28 In assessing whether each of Aldi, Lidl GB and Lidl NI sells its Groceries range ‘at a low price’, the CMA will consider:

(a) **Third-party data**: evidence comparing Groceries prices between LGRs and each of Aldi, Lidl GB and Lidl NI.

(b) **Retailer benchmarking**: Grocery price benchmarking conducted by each of Aldi, Lidl GB and Lidl NI in relation to LGRs, and by LGRs in relation to each of those Grocery Retailers; and

(c) **Price-matching behaviour**: Evidence of Grocery price-matching by LGRs in response to each of Aldi, Lidl GB and Lidl NI.

Large Grocery Retailer

2.29 As noted at paragraph 2.16 above, the Order provides for the designation of additional Grocery Retailers as LGRs where the criteria in Article 3(4) of the Order are met. To be an LGR, a Grocery Retailer must:

(a) operate Larger Grocery Stores throughout either Great Britain or Northern Ireland or both or in a considerable part or parts of the United Kingdom;

(b) carry a full range of Groceries for sale at the retail level; and

(c) have an integrated grocery wholesaling function that purchases directly from grocery suppliers.

2.30 Each of the designation criteria is considered in further detail below.

[49] Final Report, paragraph 3.3.

Operates Larger Grocery Stores throughout either Great Britain or Northern Ireland or both, or in a considerable part or parts of the United Kingdom

2.31 This criterion concerns both the size of the Grocery Retailers' stores and their geographic coverage.

Size of store

2.32 To be designated as an LGR, a Grocery Retailer must operate Larger Grocery Stores,[50] defined as stores with a Net Sales Area of more than 1,000 sqm.[51]

2.33 The Order defines **Net Sales Area** as 'the internal sales area within a Grocery Store comprising all internal areas accessible to the customer and excludes the area in which checkouts, lobbies, concessions, restaurants, customer toilets and walkways behind the checkouts are sited where these are not used for the sale of Groceries'.[52] The Explanatory Note to the Order states that Net Sales Area 'includes all sales area (groceries and non-groceries) within a Grocery Store'.[53]

2.34 The CMA will therefore consider evidence of the size of stores operated by each of Aldi, Lidl GB and Lidl NI.

Geographic coverage of Grocery Stores

2.35 To be designated as an LGR, a Grocery Retailer must operate Larger Grocery Stores[54] throughout either Great Britain or Northern Ireland or both, or in a considerable part or parts of the United Kingdom. The Explanatory Note to the Order states that this criterion captures Grocery Retailers that have stores across a number of regions but that do not necessarily have a presence throughout the whole of Great Britain or Northern Ireland.[55]

2.36 The CMA will therefore consider evidence of the geographic coverage of Larger Grocery Stores operated by each of Aldi, Lidl GB and Lidl NI.

Carries a full range of Groceries for sale at the retail level

2.37 To be designated as an LGR, a Grocery Retailer must offer a full range of Groceries for sale at the retail level.

[50] A '**Grocery Store'** means 'a retail store, a significant proportion of which is devoted to the sale of Groceries, but excludes stores operated by Limited Assortment Discounters and Frozen Food Retailers'. The Explanatory Note to accompany the Order (the **'Explanatory Note to the Order**') makes clear that the term 'a significant proportion' is used to exclude stores where there is some but not a large amount of the store area allocated to the sale of Groceries (such as Boots, which sells sandwiches and other lunchtime food).
[51] Order, Article 2(1).
[52] Order, Article 2(1).
[53] Explanatory Note to the Order, paragraph 14.
[54] Order, Article 2(1).
[55] Explanatory Note to the Order, paragraph 23(a).

2.38 Although the Order does not provide a further explanation of ‘full range of Groceries’ the CMA has had regard to the purpose of the definition in the Order, namely, to ensure the continued effectiveness of the CC’s remedies by ensuring that the remedies identified by the CC can reflect changing circumstances (see further paragraph 2.15 above).

2.39 Under this criterion, the CMA will primarily have regard to category coverage and overall composition of each of Aldi’s, Lidl GB’s and Lidl NI’s ranges.

2.40 As a starting point, the CMA considers that a Grocery Retailer offering a ‘full range of Groceries for sale at the retail level’ should carry products in all of the categories included in the Order’s definition of Groceries,[56] namely: food (other than that sold for consumption in the store), pet food, drinks (other than those sold for consumption in the store), cleaning products, toiletries and household goods.[57]

2.41 The CMA would also expect coverage of the following categories of Groceries: Ambient Grocery, Grocery Non-Food (including household goods, cleaning products, toiletries and pet food), Chilled, Frozen, Meat and Fish, Produce, Bakery, Delicatessen and Beverages (including beer/wines/spirits). These categories are based on the categories of groceries included in Appendix 3.1 of the Final Report where the CC set out summary profiles of UK grocery retailers and their estimated ‘sales mix’: for example, see Table 4 of Appendix 3.1 to the Final Report.

2.42 In terms of coverage within the categories set out at paragraphs 2.40 to 2.41 above, the CMA will consider whether there are any material gaps in the ranges of Aldi, Lidl GB and Lidl NI. The CMA will also consider the extent of the own-brand grocery ranges of Aldi, Lidl GB and Lidl NI. In line with the CC’s approach in its Final Report (including its assessment of M&S), the CMA considers that a Grocery Retailer need not match the breadth and depth of LGRs’ product ranges within each category. A more limited number of SKUs, an own-label focused model, or a narrower range within product segments does not necessarily preclude a finding that the Grocery Retailer offers a ‘full range of groceries’, provided core categories are represented.[58] The CMA will also have regard to the business model of each Grocery Retailer.

[56] In an earlier draft of the Order, the CC removed the ‘full’ requirement from ‘full range of Groceries’, requiring only that retailers carry a ‘range of Groceries’ to be designated (Groceries-Controlled Land order 2nd consultation-mark up-18Nov09.doc). The accompanying ‘Responses to Consultation’ document stated that the exclusion occurred in light of a consultation response that ‘a retailer need not carry all of the products described in the definition of ‘Groceries’ to be regarded as a grocery retailer’ (Responses to Consultation - Controlled land order, paragraph 11). However, the ‘full’ requirement was reinstated in subsequent drafts of the Order. Its inclusion therefore represents a deliberate choice by the CC. The drafting history of this provision of the Order also indicates a clear link between the ‘full range of Groceries’ criterion and the products described in the definition of Groceries in the Order.

[57] Order, Article 2(1).

[58] Final Report, paragraph 4.77 and Appendix 3.1, paragraph 13. M&S considered that it offered a similar range of the core grocery products to the main supermarkets (see Table 10 at Appendix 3.1 to Final Report). However, it did not offer the same variety within those product lines. M&S’s product lines provided a range across the key product segments. M&S’s strategy for its product range was to stock a single M&S brand for a product segment. This could be contrasted

2.43 The CMA also recognises the relevance of the views and behaviour of consumers to its assessment of this criterion, in particular whether consumers are able to complete a main weekly shop at each of Aldi, Lidl GB and Lidl NI. Given that consumers can complete a main weekly shop at an LGR, if they can also do so at a Grocery Retailer, this indicates that those Grocery Retailers also 'carry a full range of Groceries' for the purposes of the Order.

2.44 The CMA will also consider the competitive constraint that each of Aldi, Lidl GB and Lidl NI places on the LGRs as, if a Grocery Retailer imposes a material competitive constraint on LGRs, that indicates it is also likely to 'carry a full range of Groceries' for the purposes of the Order.

Has an integrated grocery wholesaling function that purchases directly from grocery suppliers

2.45 The final criterion is that the Grocery Retailer has an integrated grocery wholesaling function that purchases directly from grocery suppliers. In its Final Report, the CC found that the buying power of an integrated wholesale function was a feature of large grocery retailers.[59]

2.46 The CMA will therefore assess whether each of Aldi, Lidl GB and Lidl NI has an integrated grocery wholesaling function that purchases directly from grocery suppliers.

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with the strategies of other retailers which often offered up to six different versions of a product and cited a much larger product range. Final Report, Appendix 3.1, paragraph 13.

[59] Final Report, paragraphs 3.3 and 3.26 to 3.29. The CC noted that, by contrast, regional grocery retailers generally used grocery wholesalers to source supplies or used buying groups to negotiate on their behalf with suppliers and that symbol group retailers such as Spar, Londis and Costcutter, which operated stores under a common fascia (or symbol), generally sourced supplies through affiliated wholesalers.

3. Separate assessment of Lidl GB and Lidl NI

3.1 At the time of the Final Report, Lidl UK GmbH operated its business on a UK-wide basis.[60] Since then, its UK operations have been restructured such that Lidl GB operates in Great Britain, and Lidl NI operates in Northern Ireland.[61]

3.2 Where a Grocery Retailer structures its UK Groceries business so that different legal entities within a wider corporate group operate in different parts of the UK, and those businesses are eligible for designation under the Order, the CMA could in principle designate either:

(a) each operating business separately, or

(b) a single entity in the corporate group that exercises control over the wider UK business(es) (the 'parent' entity).

3.3 The CMA will determine the appropriate approach on a case-by-case basis, having regard to the purpose of the Order and the nature of the businesses which are eligible for designation under the Order.[62]

Lidl GB

3.4 Lidl GB's principal activity is the retailing of grocery products in Great Britain.[63] It submitted that the LGR designation criteria should be assessed on an individual corporate entity basis.[64]

3.5 Lidl GB submitted that notwithstanding its membership of the Lidl Group and wider Schwarz Group, it retains full operational autonomy over its commercial strategy, and sole authority over both its product range and pricing strategy. Lidl GB submitted that while it participates in group procurement for certain goods within the Schwarz Group, this has no impact on its decision-making autonomy.[65]

3.6 Lidl GB also submitted that there is no common management structure linking Lidl GB with Lidl NI and that Lidl does not treat the United Kingdom as a single, integrated market for retail operations.[66] Lidl GB further submitted that some procurement is conducted via other Lidl country businesses, or Lidl Stiftung & Co. KG, noting that each supplier working with Lidl has only one Lidl company managing the relationship across all markets. However, Lidl GB's Buying

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[60] In its Final Report, paragraph 1.6, the CC identified Lidl UK GmbH as one of the main parties to its investigation. The CC also decided to designate Lidl UK GmbH in its grocery supply chain remedy; see Schedule 2, GSCOP Order.
[61] From 1 March 2019, Lidl GB Ltd carried on the whole or a substantial part of the business formerly carried on by Lidl UK GmbH and therefore from that date Lidl GB Ltd was designated under the GSCOP Order.
[62] See for example, in respect of the GSCOP Order, the designation decision in respect of Amazon.com Inc, to cover the contracting with grocery suppliers of both Amazon EU Sarl and Fresh & Wild Limited, both of which operated in the UK (Notice of Designation of Amazon.com, Incorporated).
[63] Lidl GB, Annual Report and Financial Statements for the year ended 28 February 2025, page 1.
[64] Lidl GB's submission to the CMA [✂].
[65] Lidl GB's submission to the CMA [✂].
[66] Lidl GB's submission to the CMA [✂].

Department determines the product range and retail pricing for products supplied in Great Britain.[67]

Lidl NI

3.7 Lidl NI's principal activity is the retailing of grocery products in Northern Ireland.[68] Lidl NI also submitted that the LGR designation criteria should be assessed on an individual corporate entity basis.[69]

3.8 Lidl NI stated that it exercises exclusive decision-making authority over its product range and pricing, notwithstanding its position within the Lidl Group and wider Schwarz Group.[70]

3.9 Lidl NI also submitted that there is no integrated management framework linking Lidl NI with Lidl GB and that Lidl does not manage the United Kingdom as a singular unified retail territory.[71]

3.10 Lidl NI confirmed that it utilises purchasing services provided by Lidl Stiftung & Co. KG for products it does not independently negotiate, including a range of SKUs sourced via Lidl GB.[72] Lidl NI submitted that whilst for reasons of operational efficiency, all procurement functions and coordination with group service providers are executed by the Lidl Ireland GmbH buying team, it retains sole discretion over its retail pricing and product range. It submitted that this autonomy enables the Lidl NI business to ensure its range aligns with its NI market requirements.[73]

Provisional CMA view on the separate assessment of Lidl GB and Lidl NI

3.11 The purpose of the Order is to remedy, mitigate or prevent the adverse effect on competition identified by the CC in its Final Report in relation to the high levels of concentration in local markets for the supply of groceries by mid-sized and larger grocery stores, and the control of land in highly-concentrated local markets by incumbent retailers.[74] The Order applies to Grocery Retailers designated as LGRs. As noted above at paragraphs 2.9 and 2.16, to ensure effectiveness of the remedies identified by the CC in the Final Report, the Order provides for the designation of additional grocery retailers as LGRs where specified criteria are met.

3.12 The CMA's task under the Order is to assess whether a Grocery Retailer (i) is a LAD, and (ii) if it is not a LAD, whether it is an LGR. A Grocery Retailer's price and

[67] Lidl GB's response to the CMA's s.174 Notice [✂].
[68] Lidl NI, Annual Report and Financial Statements, 28 February 2025, page 4.
[69] Lidl NI's submission to the CMA [✂].
[70] Lidl NI's submission to the CMA [✂].
[71] Lidl NI's submission to the CMA [✂].
[72] Lidl NI's response to the CMA's s.174 Notice [✂].
[73] Lidl NI's response to the CMA's s.174 Notice [✂].
[74] And any detrimental effects so far as they have resulted, or may be expected to result, from that adverse effect on competition. Notice of making Controlled Land Order, paragraphs 3 and 12.

product range are important aspects of the LAD assessment, and its product range and procurement of that range are important aspects of the LGR assessment.

3.13 On the evidence we have seen to date, Lidl GB and Lidl NI have, on a longstanding basis, made separate and independent decisions on range and pricing in their respective markets, and undertake procurement through different purchasing teams (with Lidl NI relying on the Lidl Ireland GmBH procurement team). While both entities utilise certain group level arrangements (including where a single Lidl entity manages a supplier relationship across markets) this practice is consistent within the wider corporate group. While such practices place some limitations on the range from which they can select, both Lidl GB and Lidl NI separately determine the products they stock and the prices at which they are sold.

3.14 The CMA therefore provisionally considers it appropriate in the circumstances to conduct separate designation assessments for each of Lidl GB and Lidl NI.

4. Evidence gathered

4.1 This section sets out the evidence gathered to inform our provisional designation assessments as set out in Section 5.

The evidence we reviewed

4.2 In June 2025 the CMA used its powers under section 174 EA02 to gather information from each of Aldi, Lidl GB, and Lidl NI, including on stores, range, pricing and wholesaling function.

4.3 In March 2026 the CMA issued a public invitation to comment on the potential designation of Aldi and Lidl under the Order. The CMA also used its statutory powers to gather further information from Aldi, Lidl GB, and Lidl NI; and from the seven existing LGRs.[75]

4.4 In May 2026 the CMA held a series of meetings with Aldi, Lidl GB, and Lidl NI.

4.5 The CMA has also had regard, where relevant, to its wider work in the grocery market, including its 2023 report on 'Competition, choice and rising prices in groceries',[76] and its 2019 final report on the 'Anticipated merger between J Sainsbury plc and Asda Group Ltd'.[77]

4.6 Having regard to the criteria within the definitions for LAD and LGR set out in the framework for designation at Section 2 above, and the factors discussed in paragraphs 2.25 to 2.28 and 2.40 to 2.44 above, the CMA has gathered evidence on a number of topics relevant to its assessment. Each of these is considered in further detail below.

Number of SKUs

4.7 This sub-section sets out the evidence on the number of SKUs stocked by each of Aldi, Lidl GB and Lidl NI and the LGRs.

4.8 The CMA recognises that SKUs can be counted in different ways. In particular, the CMA understands that Aldi, Lidl GB and Lidl NI each manage multiple product variants within a case as a single SKU.[78] Aldi explained that each case may contain up to four variants, for example four different flavours, all sharing the same case code, brand, weight (with minor variance) and price. The product variants are managed by case, not by variant, meaning cases are ordered, stocked and

[75] Potential designation of Aldi and Lidl under the Groceries Market Investigation (Controlled Land) Order 2010.
[76] CMA, Competition, choice and rising prices in groceries, July 2023.
[77] CMA, Anticipated merger between J Sainsbury PLC and Asda Group Ltd, 25 April 2019 (**Sainsbury's/Asda**).
[78] Aldi's response to the CMA's s.174 Notice [✂]; Note of meeting with Lidl GB [✂]; Note of meeting with Lidl NI [✂].

replenished as a single unit rather than individually by variant.[79] For this assessment, however, the CMA has counted each product variant separately, as this better reflects the range available to consumers and provides a more consistent comparison with the LGRs, which count similar variations separately. As such, the CMA has treated a SKU as a distinct product variant, based on factors such as brand, quantity and packaging.[80]

4.9 The CMA also considered whether to compare Grocery Retailers' core ranges only, excluding SKUs that are seasonal, regional, trial, limited one-off, or otherwise temporary. However, the CMA considers that non-core products still form part of the range available to consumers. Any temporary or geographically limited availability is better reflected through an average SKU count, which gives proportionally less weight to such products. This approach also reduces the risk of inconsistent comparisons arising from Grocery Retailers using different approaches to define and calculate their core ranges.

4.10 The CC's Final Report found that LADs carried a limited range of grocery products. At that time, the three major LADs in the UK were Aldi, Lidl and Netto.[81] Each of Aldi, Lidl and Netto carried in the region of 1,000 to 1,400 SKUs in stores ranging from 500 to 1,400 sqm,[82] compared with around 5,000 to 10,000 products in similarly sized LGR stores.[83] The CC also reported that Aldi stocked approximately 850 core SKUs, although it is unclear what non-core SKUs were excluded. It is also unclear whether the Aldi and Lidl figures were based on case level SKUs (potentially including multiple flavour variants) or were for individual variants. Aldi, in large part, carried only own-label goods, while Lidl carried larger volumes of branded products.[84]

4.11 Table 4.1 sets out the current average number of Grocery SKUs carried by each Grocery Retailer stores with a Net Sales Area between 1,000 to 2,000 sqm.

[79] Aldi's response to the CMA's ITC, page 1. See Appendix A, Table 1.1, Notes v), vi), and vii, for further detail on Aldi, Lidl GB, and Lidl NI's submissions on SKU count.

[80] To distinguish between the two for the purpose of this report, the CMA has where relevant referred to 'products' when reporting figures provided by Grocery Retailers where they internally capture multiple variants under one SKU. For example, Aldi reported having [2,000-3,000] total products and [2,000-3,000] core products based on its internal report, but when splitting out variants had [4,000-5,000] SKUs as reported in Table 4.1; Lidl GB had approximately [2,000-3,000] core assortment products; and Lidl NI had under [2,000-3,000] products. Aldi's response to the CMA's s.174 Notice [✂]; Aldi's response to the CMA's ITC, page 1; Note of meeting with Lidl GB [✂]; Note of meeting with Lidl NI [✂].

[81] The Final Report stated that another LAD retailer in the UK was Home Bargains, owned by TJ Morris Ltd, which had approximately 140 stores across the UK and sold a range of discounted brand name products, including groceries. Final Report, paragraph 3.3.

[82] Final Report, paragraph 3.3. We note that the CC referred to product lines in the original text, but it used product lines and SKUs interchangeably, as seen in the Final Report, paragraph 4.20.

[83] Final Report, paragraph 4.80. See also Final Report Appendix 3.1, paragraphs 33 and 34.

[84] Final Report, paragraph 3.3.

Table 4.1: Average number of Grocery SKUs in stores with Net Sales Area between 1,000 to 2,000 sqm

Grocery retailer	Average number of Grocery SKUs in stores with NSA between 1,000 to 2,000 sqm
Asda	[18,000-20,000]
Co-op	[9,000-10,000]
M&S	[6,000-7,000]
Morrisons	[12,000-14,000]
Sainsbury's	[18,000-20,000]
Tesco	[9,000-10,000]
Waitrose	[18,000-20,000]
Aldi	[4,000-5,000]
Lidl GB	[4,000-5,000]
Lidl NI	[4,000-5,000]

Source: Responses to the CMA's s.174 Notices with relevant notes set out in Appendix A, Table 1.1.

4.12 As shown above in Table 4.1, in stores with Net Sales Area between 1,000 to 2,000 sqm:[85]

(a) Aldi, Lidl GB and Lidl NI offer between [4,000-5,000] SKUs (for Lidl GB and Lidl NI) and [4,000-5,000] (for Aldi) SKUs in total.

(b) There is a wide range of SKU numbers within the LGRs; the LGR with the greatest number of SKUs has over [✂] times as many as the LGR with the fewest.

(c) The gaps between Aldi, Lidl GB and Lidl NI and the LGRs range from around [✂] between [✂] and the LGR with the fewest SKUs and around [✂] between [✂] and the LGR with the most SKUs.

Range strategies and own-branded products

4.13 This sub-section sets out evidence on Grocery Retailers' range strategies and own-branded products.

Own-brand

4.14 Table 4.2 shows grocery retailers' average number of own-brand Groceries SKUs and the average proportion of Groceries SKUs which are own-brand.[86]

[85] See Appendix A, Table 1.1 for further detail.
[86] See Appendix A Table 1.2 for further detail.

Table 4.2: **Average number and proportion of Groceries SKUs which are own-brand in stores with Net Sales Area between 1,000 to 2,000 sqm**

Grocery retailer	Average number of those Groceries SKUs which are own-brand in stores with Net Sales Areas between 1,000 to 2,000 sqm	Average percentage of those Groceries SKUs which are own-brand in stores with Net Sales Areas between 1,000 to 2,000 sqm
Asda	[3,600-6,000]	[20-30]%
Co-op	[1,800-3,000]	[20-30]%
M&S	[5,400-7,000]	[90-100]%
Morrisons	[3,600-5,600]	[30-40]%
Sainsbury's	[5,400-8,000]	[30-40]%
Tesco	[2,700-4,000]	[30-40]%
Waitrose	[5,400-8,000]	[30-40]%
Aldi	[3,600-5,000]	[90-100]%
Lidl GB	[3,200-4,500]	[80-90]%
Lidl NI	[3,200-4,500]	[80-90]%

Source: CMA analysis of responses to the CMA's s.174 Notices with relevant notes set out in Appendix A, Table 1.2.

4.15 As can be seen in Table 4.2, in stores with Net Sales Area between 1,000 to 2,000 sqm:

(a) Each of Aldi, Lidl GB and Lidl NI predominantly stocks own-brand Groceries SKUs.

(b) For most LGRs the majority of Groceries SKUs are not own-brand. M&S is the exception with a similar proportion of Groceries SKUs which are own-brand to each of Aldi, Lidl GB and Lidl NI.

(c) In terms of the number of own-brand Groceries SKUs, each of Aldi, Lidl GB and Lidl NI is more similar to [✂].

Categories

4.16 The Order's definition of Groceries included the categories food, pet food, drinks, cleaning products, toiletries and household goods. While each uses different terms for their exact product categories, Aldi, Lidl GB and Lidl NI all offer products in all six categories.

(a) Aldi identifies its own product categories as (among others) fruits and vegetables, pantry, freezer, alcoholic, non-alcoholic beverages, household and health, beauty and baby.[87] Aldi also sells pet food.[88]

[87] Aldi's response to the CMA's s.174 Notice [✂].
[88] Pet Care | Aldi UK, accessed on 23 June 2026.

(b) Lidl GB identifies its categories as fruits and vegetables, frozen, chilled, ambient (which includes pet food, beverages, cleaning products, washing products and household goods), fresh bread / hot convenience, fresh meat, poultry and fish.[89]

(c) Lidl NI identifies its categories as (among others) fresh meat, bakery, hard vegetables, pet food, non-alcoholic beverages, wine/champagne, washing detergent/cleaning agent, personal hygiene/beauty and household goods.[90]

4.17 To further understand the differences in range between each of Aldi, Lidl GB and Lidl NI and LGRs, we compared the number of SKUs each Grocery Retailer offers in nine broad categories based on the categories of groceries included in Appendix 3.1 of the Final Report, where the CC set out summary profiles of UK grocery retailers and their estimated 'sales mix' by category.[91] The evidence showed that:[92]

(a) Each of Aldi, Lidl GB and Lidl NI sells goods in each of the product categories.[93]

(b) Aldi offers fewer SKUs in all product categories than almost all the LGRs.[94]

(c) Lidl GB offers fewer SKUs in all product categories than almost all the LGRs.[95]

(d) Lidl NI offers fewer SKUs than all the LGRs in all product categories.

(e) Compared to the LGRs, each of Aldi, Lidl GB and Lidl NI has a different spread of SKUs across categories, most notably each has a smaller proportion of SKUs in grocery non-food and beverages and higher proportions in chilled and frozen. In the categories where Aldi, Lidl GB and Lidl NI had a notably lower proportion of SKUs compared to the LGRs they each stocked hundreds of SKUs.[96]

[89] Lidl GB's response to the CMA's s.174 Notice [✂].
[90] Lidl NI's response to the CMA's s.174 Notice [✂].
[91] The categories are Ambient Groceries, Grocery non-food (including household goods, cleaning products, toiletries and pet food), Chilled, Frozen, Meat/Fish, Produce, Bakery, Delicatessen and Beverages (including beer/wines/spirits). Some retailers added an additional category (ie Fresh, Miscellaneous and Other) though since not all retailers used these categories, we exclude them from our comparisons.
[92] See Appendix A, Table 1.3 and Table 1.4 for further detail.
[93] Note that each of Aldi, Lidl GB and Lidl NI do not allocate any SKUs to the Delicatessen product category (see Appendix A, notes to Table 1.3 and Table 1.4), however, based on more detailed categorisations submitted by Aldi, Lidl GB, and Lidl NI, the CMA considers that they allocated these products to other categories. Aldi's response to the CMA's s.174 Notice [✂]; Lidl GB's response to the CMA's s.174 Notice [✂]; Lidl NI's response to the CMA's s.174 Notice [✂].
[94] Aldi offers more SKUs in the Frozen category than [✂] and [✂] and more in Meat/Fish than [✂].
[95] Lidl GB offers more SKUs in the Frozen category than [✂] and [✂] and more in Meat/Fish than [✂].
[96] Aldi's response to the CMA's s.174 Notice [✂]; Lidl GB's response to the CMA's s.174 Notice [✂]; Lidl NI's response to the CMA's s.174 Notice [✂]; Responses to the CMA's s.174 Notices: [✂].

Gaps in ranges

4.18 This sub-section sets out evidence on gaps in ranges of Aldi, Lidl GB, and Lidl NI.

Views of Aldi, Lidl GB and Lidl NI on range

4.19 The CMA asked each of Aldi, Lidl GB and Lidl NI what gaps they had in their respective range compared to LGRs. Further, Aldi, Lidl GB and Lidl NI each submitted evidence on how their respective ranges compare to LGRs' ranges.

Aldi

4.20 Overall, Aldi submitted that its range remains more limited than LGRs, particularly in branded goods, specialist lines, free-from, organic, international, health and beauty and service counter type offerings.

4.21 Aldi submitted that 'Customers cannot complete a main weekly shop in Aldi that would be equivalent to a main weekly shop in LGRs, especially in the provision of lots of popular branded products, health and beauty ranges, baby accessories, international cuisines, halal options, vegan and gluten free options and organic products'.[97, 98] Aldi submitted that LGRs' core range is between 20,000 to 30,000 SKUs, which is between 10 to 15 times larger than Aldi's core range.[99]

4.22 Aldi also submitted that it focuses on a limited, curated range, rather than attempting to meet all customer needs and that its range is significantly more restricted than that of LGRs in terms of both breadth and depth. Regarding breadth, Aldi's free-from offering is limited, as well as its vegetarian and vegan ranges compared to some of the LGRs. Aldi stores do not include butcher or specialist counters, pizza counters, pick-and-mix, newspapers or significant health and beauty offerings. Regarding depth of range, Aldi stocks limited SKU counts across categories such as ambient grocery. Aldi submitted that it stocks relatively few lines of organic produce, local speciality foods, exotic fruits and vegetables, pet products and household washing/cleaning products. Aldi also submitted that, across most product categories, LGRs offer a wide variety of options (for example, multiple origins, formats, and quality tiers), whereas Aldi offers a small number of core products and a small number of variants.[100]

4.23 Further, Aldi submitted that customer research consistently identifies [✂] as key reasons for consumers shopping elsewhere.[101] Aldi submitted that within the competitive set outlined in Worldpanel's data (Tesco, Sainsbury's, Asda,

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[97] Note that certain products within health and beauty ranges and baby accessories are not considered Groceries and are therefore not in the scope of our consultation.
[98] Aldi's response to the CMA's ITC [✂].
[99] Aldi's response to the CMA's ITC page 2.
[100] Note of meeting with Aldi [✂]. See also Aldi's submission to the CMA [✂].
[101] Aldi's response to the CMA's ITC [✂].

Morrisons, Waitrose, Iceland Foods Limited (**Iceland**), Aldi and Lidl GB), Aldi had remained ranked [✄] below [✄].[102] Aldi's score in each period has averaged [✄], falling to [✄] in January and February 2026, and it is consistently [✄] behind the average of [✄].[103]

4.24 Aldi submitted that its limited range was recognised by consumers and shaped purchasing behaviour. Aldi stated that [✄] research indicated that only [0-5]% of shoppers were willing to only shop at a LAD and that the majority of customers shop around as they cannot complete a weekly shop at Aldi or LADs more generally. Aldi stated that this again reflected the limited range that it offers and was underscored by the fact [70-80%] spent by Aldi shoppers was spent with other grocery retailers (a figure that has remained largely consistent over the last four years).[104]

Lidl GB

4.25 Overall, Lidl GB submitted that its range remains significantly narrower than LGRs, with fewer branded and specialist options and limited provision in areas such as free-from and world foods.

4.26 In particular, Lidl GB told us that it has a lack of in-store concessions, identifying butcher counters, pharmacies, delicatessen counters, fishmonger counters, opticians and in-store cafes as outside its provision.[105] Further, Lidl GB submitted that its range is significantly narrower than that of LGRs, with its core product range typically around one-tenth of the size of the LGRs, and that it does not seek to replicate the breadth of branded and 'tertiary' (brands with lower customer recognition) options available at LGRs.[106] Lidl GB also told us that a high proportion of its products are own-label (approximately [80-90]%).[107] Within many categories Lidl GB offers only a single product or a very limited number of options, whereas LGRs may offer multiple products differentiated by brand, flavour profile, format and pack size.[108] Lidl GB also stated that certain areas such as free-from or world foods are examples of areas that it does not cover, unlike the LGRs.[109] Further, Lidl GB submitted that its reduced depth of offering means that it does not cover all possible customer requirements within each category. It stated that, while its range is designed to meet the needs of a broad base of customers, some

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[102] Aldi's response to the CMA's ITC [✄]; and Aldi's response to the CMA's s.174 Notice [✄]. We note that Worldpanel measured perception of brand health perception, including specific questions related to product range.
[103] Aldi's response to the CMA's s.174 Notice [✄].
[104] Aldi's submission to the CMA [✄].
[105] Note of meeting with Lidl GB [✄].
[106] Note of meeting with Lidl GB [✄].
[107] Note of meeting with Lidl GB [✄].
[108] Note of meeting with Lidl GB [✄].
[109] Note of meeting with Lidl GB [✄].

customers may not be able to access specific products, formats or price points within its stores.[110]

4.27 Further, Lidl GB submitted both external market research and its own internal analysis on perceptions of its capability to meet the requirements of a full weekly shop.[111] The survey evidence, provided by Lidl GB, showed that when consumers were asked whether the store sells the right range of products to suit their needs, Lidl GB ranked worse than those of [✄], but better than [✄].[112] Further, Lidl GB ranked [✄] for the variety of products available and on the ability to do your full grocery shopping.[113]

Lidl NI

4.28 Overall, Lidl NI submitted that its range lacks breadth and depth compared with LGRs, particularly in organic, gluten-free, ambient, branded and specialist products, although it aims to meet core shopper needs through a focussed range.

4.29 In particular, Lidl NI submitted that its grocery offering lacks breadth compared to LGRs.[114] Lidl NI pointed to areas such as gifting confectionary, alcohol, organic, gluten free, frozen meats, cheeses, dairy, cooked meats, herbs and spices and baking as containing the most significant gaps in its range in comparison to its competitors.[115] Lidl NI also noted that category level market share data indicates where there are gaps in its range (for example, ambient, confectionery, drinks, snacking and alcohol).[116] Further, Lidl NI submitted that there were service gaps given that it did not operate fresh service counters, such as in-store butchers or fishmongers.[117]

4.30 Lidl NI also submitted that, across almost every product category, it offers less depth than its competitors, with the exception of meat and poultry (which it said was a predominantly private-label driven category).[118] Lidl NI acknowledged that it advertised to customers that they can buy ‘everything they need’ from Lidl stores, but submitted that this does not imply equivalence with the full range offer of LGRs.[119] In particular, Lidl NI noted that it tries to offer customers everything they need, but that it removes the ‘choice’ that a customer can get from larger grocery retailers,[120] seeking to offer one variant or pack size per product need, whereas Lidl NI’s competitors may offer 4-5 variants.[121] Lidl NI submitted that: in dry

[110] Note of meeting with Lidl GB [✄].
[111] Note of meeting with Lidl GB [✄].
[112] Lidl GB’s response to the CMA’s s.174 Notice [✄].
[113] Lidl GB’s response to the CMA’s s.174 Notice [✄]. See also Note of meeting with Lidl GB [✄].
[114] Note of meeting with Lidl NI [✄].
[115] Note of meeting with Lidl NI [✄].
[116] Note of meeting with Lidl NI [✄].
[117] Lidl NI’s response to the CMA’s information request [✄].
[118] Note of meeting with Lidl NI [✄].
[119] Note of meeting with Lidl NI [✄].
[120] Note of meeting with Lidl NI [✄].
[121] Note of meeting with Lidl NI [✄].

ambient (basic foodstuffs, baking, cereals) there was a difference of [0-1,000] SKUs compared to an LGR and this gap was most pronounced in branded goods; in herbs and spices Lidl NI only stocked [0-1,000] non-branded SKUs compared to approximately [0-1,000] SKUs in an LGR; and in specialist items Lidl NI stated that its model excluded 'niche, non-core items' that did not meet high-volume demand (for example saffron).[122]

4.31 Further, Lidl NI submitted internal survey evidence that showed consumers perceived its range less favourably than those of [✂], [✂] and [✂]. This was the lowest score with [✂]. Year-on-year Lidl have improved by [✂] in shoppers' perception of providing range of products and a good variety of products.[123]

4.32 Lidl NI also acknowledged that its range has increased since entry into the Northern Irish market but submitted that its range remains significantly smaller than those of designated LGRs. For example, Lidl NI would seek to offer one variant or one size to meet the customers' needs in each of the product areas, whereas Lidl NI's competitors may offer 4-5 variants.[124] Lidl NI also highlighted that since the CC's market investigation, Lidl NI's product range has had significant growth in chilled products, ready meals and frozen ranges, driven by customer demand.[125] Lidl NI stated that across its product categories, Lidl NI is meeting a core shopper's needs. However, those shoppers will have a smaller choice of branded products at Lidl NI compared to other major retailers.[126] Further, Lidl NI submitted that while there has been a marginal increase in SKU count, this did not represent a shift toward a 'full range' model (within the context of the Order).[127]

Third-party views

4.33 In response to our ITC, one response from a consumer submitted that Lidl only stocks limited selections of international cuisine, certain spices, cooking oils and vinegar, grains and pulses (such as rice variants other than white and brown) and toiletries and cleaning supplies.[128]

4.34 The Association of Convenience Stores (**ACS**) stated that Aldi and Lidl GB have expanded their grocery ranges substantially and are increasingly viewed as destinations for a broader grocery shop (see paragraph 4.41(f)).

4.35 Other third parties, including LGRs, noted that Aldi and Lidl GB have strong ranges and broad coverage of everyday groceries, that they sell everything that

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[122] Lidl NI's submission to the CMA [✂].
[123] Lidl NI's response to the CMA's s.174 Notice issued 30 March 2026 [✂]. See also note of meeting with Lidl NI [✂].
[124] Note of meeting with Lidl NI [✂].
[125] Note of meeting with Lidl NI [✂].
[126] Note of meeting with Lidl NI [✂].
[127] Lidl NI's response to the CMA's information request [✂].
[128] Individual's response to the CMA's ITC, questions 1a) and 1d).

customers need for a weekly shop and that they are substitutable to existing LGRs in the eyes of consumers (see paragraphs 4.69 to 4.72 below).

Business models

4.36 This sub-section sets out evidence on Aldi, Lidl GB, and Lidl NI's respective business models. Overall, Aldi, Lidl GB and Lidl NI each submitted that their business models remain based on a focussed, limited assortment, offer designed to support low prices, although each acknowledged that their ranges are intended to meet core grocery needs. In particular:

(a) In line with the evidence on the number of SKUs, Aldi submitted that its more limited product range remains core to its business model and enables it to offer lower prices to its customers.[129] Aldi submitted that its business model has not changed since the Order came into effect.[130] It stated that this low-cost, limited assortment model is fundamental to its competitive positioning and results in a materially different shopping proposition compared with LGRs.[131] Aldi also noted that it does not offer e-commerce, including home delivery or click-and-collect services, or a loyalty card or app-based scheme, and submitted that these factors demonstrate that its model has not materially converged with that of LGRs since 2010.[132]

(b) Lidl GB submitted that its core range is roughly around one-tenth of the size of an LGR.[133] Lidl GB noted that its core approach has remained fundamentally consistent over time; it continues to operate a limited assortment model, centred on a relatively small number of SKUs.[134] Lidl GB emphasised that it does not seek to replicate the breadth of branded and 'tertiary' options available at LGRs.[135] By driving large volume through a small number of SKUs, Lidl GB is able to drive down costs for both Lidl GB and its suppliers. These savings are then passed on to the consumer through lower retail prices.[136] Lidl GB also submitted that its operating model differed from the operating model of LGRs due to the absence of online shopping, home delivery or click-and-collect services, and the lack of in-store concessions.[137]

(c) Lidl NI submitted that its grocery offering is materially smaller than that of designated LGRs and lacks equivalent breadth and depth. It acknowledged that it advertised to customers that they can buy 'everything they need' from

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[129] Note of meeting with Aldi [✂].
[130] Aldi's submission to the CMA [✂].
[131] Note of meeting with Aldi [✂].
[132] Note of meeting with Aldi [✂].
[133] Note of meeting with Lidl GB [✂].
[134] Note of meeting with Lidl GB [✂].
[135] Note of meeting with Lidl GB [✂].
[136] Note of meeting with Lidl GB [✂].
[137] Note of meeting with Lidl GB [✂].

its stores, but argued that this does not imply equivalence with the full-range offer of LGRs.[138] Lidl NI explained that it focuses its range on what it feels are the most important items to customers.[139] It stated that its business model remains focused on a low SKU count and simplified range, in order to offer lower prices.[140]

Suitable destinations for a main weekly shop

4.37 This sub-section sets out evidence on consumer shopping behaviour and evidence on customers being able to complete a main weekly shop, defined by Worldpanel as a main regular shop or big stock up,[141] at each of Aldi, Lidl GB and Lidl NI.

4.38 At the time of the Sainsbury's/Asda merger investigation, the weekly shop was the most common shopping mission.[142] This is consistent with more recent evidence, with a 2025 Mintel report explaining that although 55% of consumers shop more than once a week, 49% of UK grocery shoppers do a main shop and combine it with frequent top-ups and 43% do one main shop.[143] Even these main shops are spread across retailers; the Sainsbury's/Asda merger final report outlines that customers used an average of 1.5 different brands for main shops (over a 12-week period) at the time of the investigation.[144]

4.39 In submissions to the CMA, each of Aldi, Lidl GB and Lidl NI made statements about their range and the extent to which it is sufficient for those doing a main weekly shop:

(a) Aldi submitted that customers cannot complete a main weekly shop in Aldi that would be equivalent to a main weekly shop in the LGRs, noting that its range was significantly more restricted than that of LGRs in terms of both breadth and depth (see paragraphs 4.20 to 4.24).

(b) Lidl GB submitted that its range is significantly narrower than that of LGRs and that its reduced depth of offering meant that it did not cover all possible customer requirements within each category (see paragraphs 4.25 to 4.27).

(c) Lidl NI submitted that its grocery offering lacked breadth compared to LGRs and that across almost every product category, it offered less depth than its competitors, with the exception of meat and poultry (see paragraphs 4.28 to 4.32).

[138] Note of meeting with Lidl NI [✂].
[139] Note of meeting with Lidl NI [✂].
[140] Note of meeting with Lidl NI [✂].
[141] Definition from Worldpanel data on customer mission. [✂] response to the CMA's information request [✂].
[142] Sainsbury's/Asda final report, paragraph 4.12.
[143] Mintel (2025), 'Supermarkets – UK – 2025', page 21.
[144] Sainsbury's/Asda final report, paragraph 4.11.

4.40 Each of Aldi, Lidl GB and Lidl NI make public statements about their range and the extent to which it is sufficient for those doing a main weekly shop:

(a) Aldi's website states: 'There's only one place to enjoy the full Everyday Amazing experience and that's in your local Aldi store. Whether you're looking for amazing value groceries, beautiful fresh flowers or you just want to browse our famous Middle Aisles, we have everything you need (and more!) for your big weekly shop';[145]

(b) Lidl GB's website states: 'At Lidl, we believe good quality should be affordable, which is why you'll find all you need for your weekly shop at great prices in our stores';[146] and

(c) Lidl NI's website states 'More for Less … Go Full Lidl' and in explaining how it compares products in Lidl NI to the products in Tesco, Lidl NI states that it does its shop in Lidl including 'all the bits and bobs of an average family's shop' and then selects like-for-like products from Tesco.[147]

4.41 Third-party submissions generally supported the view that Aldi, Lidl GB and Lidl NI are used for main grocery shopping. In particular:

(a) One LGR [✂] submitted data on grocery market shares in Great Britain showing that for main shops Aldi and Lidl GB ranked third and fifth respectively and their shares for main shops were higher than their overall shares.[148,149]

(b) Sainsbury's said that 'evidence on consumer shopping behaviour indicates that consumers view Aldi and Lidl as providing the full range of products they need for a main grocery shop'. Sainsbury's submitted that:[150]

(i) Aldi and Lidl's close to 20% share of all UK take-home grocery spending cannot be explained by occasional or supplementary purchases; it reflected households allocating a substantial proportion of

[145] About | ALDI UK, accessed on 30 April 2026. See also Morrisons' response to the CMA's ITC, page 2, part of point A, which explains that Aldi claims that it sells 'everything you need (and more!) for your big weekly shop' across a 'huge range of tasty groceries'. See also Iceland's response to the CMA's ITC, page 12, paragraph 22b, which quotes Aldi's website: 'Feast your eyes on our huge range of tasty groceries packed full of freshness from Britain's Cheapest Supermarket'.
[146] About us, accessed on 30 April 2026. See also Morrisons' response to the CMA's ITC, page 2, part of point A, which references Lidl's claims that 'you'll find all you need for your weekly shop at great prices in our stores'.
[147] More For Less, accessed on 22 July 2026.
[148] [✂] response to the CMA's information request [✂].
[149] The CMA notes that Aldi's share for main shop customer missions relative to its overall share was higher than for any LGR and Lidl GB's share for main shop customer missions relative to its overall share was higher than for four LGRs. In the Worldpanel data, Main Shop is defined as a main regular shop or big stock up. The data set also considers three other types of shopping mission: (i) Replenishment which refers to stocking up or a few items for use on a different day; (ii) Specific Journey which refers to for example gifts, shopping for an event or specific item, or taking advantage of a specific promotion; and (iii) For Tonight which refers to specific meals or items for use on the same day. [✂] response to the CMA's information request [✂].
[150] Sainsbury's response to the CMA's ITC, page 5, paragraph 13.

their overall weekly grocery budget to Aldi and Lidl, consistent with use for the main grocery shop.

(ii) Sainsbury's internal analysis produced from Worldpanel data found that for shoppers that do not shop at Sainsbury's, Aldi ranks third and Lidl GB ranks fifth for consumer main shop missions.

(iii) Aldi and Lidl GB have 40-60% of their volumes sold as part of a main shop, with Aldi having the highest proportion amongst Grocery Retailers and Lidl GB the third highest. Sainsbury's submitted that this demonstrated the strength of their offering as they are able to attract customers completing a large basket shop.[151]

(c) Further, Sainsbury's said that Aldi and Lidl have repeatedly entered into, and been recognised by, industry awards as 'Supermarket of the Year', 'Favourite Supermarket', or 'Grocer of the Year'. These awards assess retailers on the basis of their overall grocery proposition, suitability for routine household shopping, and ability to meet consumers' weekly shopping needs. Sainsbury's submitted that the repeated classification of Aldi and Lidl as supermarkets by independent organisations reinforces the conclusion that both retailers are widely perceived as full-range supermarkets rather than limited or supplementary grocery outlets.[152] Moreover, Sainsbury's submitted that Lidl had stated as far back as 2018, in a hearing as part of the Sainsbury's/Asda merger, that Lidl tries 'to offer every product required for a full weekly shop' notwithstanding a more limited product count.[153]

(d) Morrisons provided examples of both Aldi and Lidl GB advertising to customers that they offer a full range of groceries.[154]

(e) Iceland stated that in its view Aldi and Lidl GB have significantly increased their product range since the 2008 groceries market investigation. Iceland also said that, more fundamentally, both Aldi and Lidl GB now make available a full range of household essential items.[155]

(f) ACS stated that in recent years Aldi and Lidl GB have expanded their grocery ranges substantially and are increasingly viewed by consumers as destinations for a broader grocery shop, rather than simply a limited discount

[151] Sainsbury's response to CMA's information request [✂].
[152] Sainsbury's response to the CMA's ITC, paragraph 15; Retail Industry Awards 2024 | Winners: Supermarket of the Year | Talking Retail. We note that Sainsbury's stated that all references to Lidl in its response to the CMA's ITC include both Lidl Great Britain and Lidl Northern Ireland collectively. Sainsbury's submission to the CMA [✂].
[153] Sainsbury's response to the CMA's ITC, paragraph 15. See also Summary of hearing with Lidl on 6 November 2018, Sainsbury's/Asda, paragraph 2.
[154] Morrisons' response to the CMA's ITC, pages 1 to 2. Morrisons provided links to examples: About | ALDI UK; Groceries | ALDI UK; and About us | Lidl.
[155] Iceland's response to the CMA's ITC, paragraphs 14 and 20. Iceland noted that it understood that the estimated SKU count information to be GB-wide and it considered that Lidl stocks a wide and growing range of essential household grocery items in NI too. Iceland's response to the CMA's information request [✂].

offer.[156] Further, ACS submitted that Aldi and Lidl GB were no longer perceived in the market as offering a significantly more limited range of groceries than designated Large Grocery Retailers.[157]

4.42 A 2025 Mintel report used a consumer survey to consider the extent to which Grocery Retailers were used for main grocery shopping as seen in Table 4.3. Aldi and Lidl had the fourth and fifth largest shares of respondents for main grocery shopping, with both larger than Morrisons.[158]

Table 4.3: Proportion of respondents using leading grocery retailers for main grocery shopping

Grocery retailer	Main grocery shopping, % of respondents
Tesco	32%
Sainsbury's	14%
Asda	13%
Aldi	12%
Lidl	10%
Morrisons	8%

Source: Mintel (2025), 'Supermarkets – UK – 2025', page 22. August 2025, Base: 1,903 internet users aged 16+ who are responsible/jointly responsible for grocery shopping in their household. Note: Mintel does not distinguish between Lidl GB and Lidl NI and refers just to Lidl.

Competitive constraint exerted on LGRs

4.43 This section outlines evidence on the competitive interactions between each of Aldi, Lidl GB and Lidl NI and the LGRs, and the degree of competitive constraint exerted by each of them on the LGRs.

4.44 In considering the evolution of the market since the Order, this section first covers the situation found by the CC in its Final Report; then covers subsequent findings by the CMA; and finally covers evidence gathered in this investigation, evidence on market shares, specifically views from Aldi, Lidl GB and Lidl NI and from third parties, and the price benchmarking and price matching schemes of LGRs.

Past competition investigations

4.45 The contrast in findings between the CC's 2008 Final Report and the CMA's 2019 investigation into the proposed merger of Sainsbury's/Asda shows a change in the competitive constraint Aldi, Lidl GB and Lidl NI impose on the LGRs. This is

[156] ACS's response to the CMA's ITC, page 1.
[157] ACS's response to the CMA's ITC, page 2.
[158] Mintel (2025), 'Supermarkets – UK – 2025', page 22. We note that Mintel does not distinguish between Lidl GB and Lidl NI and refers just to Lidl. 12% of respondents to their consumer survey use Aldi for main grocery shopping and 10% use Lidl. Base: Mintel, August 2025, 1,903 internet users aged 16+ who are responsible/jointly responsible for grocery shopping in their household.

notwithstanding both investigations finding that Aldi and Lidl had different business models to traditional Grocery Retailers, with much smaller ranges.

4.46 The CC's 2008 Final Report found that LGRs accounted for an estimated 85% of total UK grocery sales, with the four largest grocery retailers together accounting for just over 65%.[159] By contrast, Aldi and Lidl accounted for only 1.3% and 1.5% respectively of total UK grocery sales.[160]

4.47 In terms of competition between Aldi and Lidl and LGRs, the CC's 2008 Final Report found that:

(a) Econometric analysis of consumer demand showed that the grocery retailers included in its sample (Asda, Morrisons, Sainsbury's, Somerfield Stores Limited (**Somerfield**), Tesco and Waitrose) were close competitors to each other for both large weekly shopping trips and other shopping trips.[161]

(b) Entry analysis showed that Aldi and Lidl stores were not close substitutes for the stores of LGRs.[162]

(c) Product range was an important factor that differentiated grocery stores, and:

(i) To the extent that other grocery stores offered customers a full range of grocery products, the CC considered that these stores were effective substitutes for those operated by the LGRs, subject to its size-based delineation of the product market.[163]

(ii) The limited number of products carried by Aldi and Lidl stores meant that these stores were not close substitutes for similarly sized stores operated by Co-op, M&S, Sainsbury's, Somerfield and Tesco.[164]

(iii) Larger grocery stores operated by LGRs were not competitively constrained by LADs stores, but conversely LADs stores were competitively constrained by other LADs stores and mid-sized and larger grocery stores operated by large grocery retailers.[165]

4.48 In its 2019 investigation into the Sainsbury's/Asda merger, the CMA found that:

(a) A major development in the years before the merger was the growth of Aldi and Lidl (the report did not distinguish between Lidl GB and Lidl NI). Both had increased the number of stores since 2010 and had more than doubled their combined estimated groceries market share in Great Britain to around 13%

[159] Final Report, paragraph 3.4.
[160] Final Report, paragraph 3.4, Figure 3.1.
[161] Final Report, paragraph 4.74.
[162] Final Report, paragraphs 4.71 and 4.80.
[163] Final Report, paragraph 4.75.
[164] Final Report, paragraph 4.80.
[165] Final Report, paragraphs 4.85 and 4.86.

of sales.[166] Specifically, in the UK, Aldi was the fifth largest grocery retailer with a 7% market share and Lidl was the eighth largest with a 5% market share.[167]

(b) Aldi and Lidl had adopted a different business model to traditional grocery retailers; they tended to be cheaper than other grocery retailers, they stocked around one-fifteenth of the different product lines of a large 'Big 4'supermarket,[168] and they offered fewer branded goods.[169]

(c) Both Aldi and Lidl posed a material constraint on Asda and Sainsbury's, albeit this constraint is more limited than that provided by some other grocery retailers.[170]

(d) The constraint from an Aldi or Lidl Medium store may be greater than the constraint from a 'Big 4' Medium store, particularly on Asda stores (the CMA noted that most Aldi and Lidl stores were medium-sized stores).[171]

(e) Aldi and Lidl were in the same relevant product market along with the LGRs and Iceland (albeit the CMA stated that Iceland imposed a constraint on Sainsbury's and Asda to a 'much lesser extent').[172] This was based on evidence, including survey data, entry-exit analysis and internal documents[173] and was for all Large stores (greater than 1,400 sqm) and Medium stores (280 to 1,400 sqm).[174]

4.49 In its 2023 work 'Competition, choice and rising prices in groceries',[175] the CMA found that:

(a) Aldi and Lidl offered much smaller ranges than the major grocery retailers and competed on a low price offering with few frills and few well-known brands, though they aimed to match or exceed the quality of the major supermarkets on their own-label products.[176]

(b) Tesco, Sainsbury's, Asda and Morrisons were the major grocery retailers in Great Britain and pitched themselves as offering something to all demographics. They aimed to stay competitive with the discounters on a

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166 Sainsbury's/Asda final report, paragraph 4.8.
167 Sainsbury's/Asda final report, paragraphs 4.27 and 4.42. We note that the report did not distinguish between Lidl GB and Lidl NI.
168 Sainsbury's/Asda final report, paragraph 17, described Tesco, Sainsbury's, Asda and Morrisons as the 'so-called 'Big 4' grocery retailers'.
169 Sainsbury's/Asda final report, paragraphs 17 and 4.43. We note that this comparison of range did not account for different store sizes or relative focus on own-brand.
170 Sainsbury's/Asda final report, paragraphs 7.48.
171 Sainsbury's/Asda final report, paragraphs 7.49, and Figures 8.4 and 8.5. As can be seen in the figures, the constraint from Aldi stores was greater than from Lidl.
172 Sainsbury's/Asda final report, paragraphs 7.38 and 7.67.
173 Sainsbury's/Asda final report, paragraph 7.50.
174 Sainsbury's/Asda final report, paragraph 7.7.
175 Competition, choice and rising prices in groceries report.
176 Competition, choice and rising prices in groceries report, paragraph 3.8(b).

number of key lines and offer – to slightly varying degrees – a wide range of products, with tens of thousands of individual SKUs.[177]

(c) Grocery retailers closely monitored competitors' prices, and aimed to stay competitive with rivals, particularly for the most commonly purchased items, with a view to sustaining and increasing sales volumes. Given the number of retailers and items in question, this overall approach manifested itself in a range of different pricing strategies.[178] Some grocery retailers used the discounters as a reference point for their price strategies while some used Tesco (being the supermarket with the largest share); and others compared to more than one other retailer.[179]

(d) Consumers are increasingly prepared to shop around to find the best prices, and lower-priced grocery retailers have been successful in winning market share.[180]

4.50 We note that the 2023 report did not assess range through the type of market definition exercise undertaken by the CC in the 2008 Final Report, or by the CMA in 2019 Sainsbury's/Asda merger investigation. Nor did it assess range by reference to the designation criteria in the Order. For example, it did not take into account store size or relative emphasis on own-brand products. The CMA has taken this into account when considering what weight to place on the 2023 report for the purposes of this assessment.

Market shares of Grocery Retailers

4.51 Evidence on their market shares shows each of Aldi, Lidl GB and Lidl NI winning a significant and growing share of customers' grocery spending.

4.52 Based on recent Worldpanel data for Great Britain, in 2026 Aldi has a 10.8% grocery market share and Lidl GB an 8.6% market share.[181] Aldi is the fourth largest grocery retailer in Great Britain after Tesco, Sainsbury's and Asda, and Lidl GB is fifth largest. Both Aldi and Lidl GB have larger market shares than Morrisons, Co-op, Waitrose, and M&S.[182] Since 2020, Aldi's grocery market share has grown by over a quarter and Lidl GB has grown by over half. Further, in the

[177] Competition, choice and rising prices in groceries report, paragraph 3.8(a).
[178] Competition, choice and rising prices in groceries report, paragraph 3.40.
[179] Competition, choice and rising prices in groceries report, paragraph 3.46.
[180] Competition, choice and rising prices in groceries report, paragraph 3.40.
[181] Grocery Market Share - Worldpanel. Data for 12 weeks ending 17 May 2026. Worldpanel's Grocery Market Share data is derived from Worldpanel's research covering the household grocery purchasing habits of 30,000 demographically representative households in Great Britain. All data is based on the value of items being purchased by these consumers. Last accessed on 2 June 2026. See also Sainsbury's response to the CMA's ITC, paragraph 9; Iceland's response to the CMA's ITC, paragraph 18.; and Morrisons' response to the CMA's ITC, page 3. Market shares based on Kantar (https://www.kantar.com/campaigns/grocery-market-share) for the 12-week period 22 March 2026.
[182] While M&S is not included in the published Worldpanel data, according to Worldpanel data seen by The Grocer M&S has the same market share as Waitrose. Source: M&S market share level with Waitrose as Ocado sales boom | The Grocer, accessed 22 July 2026.

period between February 2020 and May 2026, Aldi has overtaken Morrisons in size and Lidl GB has surpassed both Co-op and Morrisons.[183]

4.53 These market share estimates are similar to those available in a recent report from Mintel,[184] which also ranked Aldi and Lidl in fourth and fifth respectively, albeit with slightly lower market shares for 2025, 9.2% and 6.3% respectively in the UK.[185] Both Aldi and Lidl's market share has increased since 2020; Aldi's from 7.8% and Lidl's from 4.4%.[186]

4.54 Lidl NI submitted that its estimated market share was 9.7% in 2026.[187] Based on Kantar data for grocery market shares in Northern Ireland, in 2025 Lidl NI had a 9.5% market share. Lidl NI was the fourth largest grocery retailer in Northern Ireland, behind Tesco, Sainsbury's, and Asda.[188] Lidl NI has also reported strong revenue growth of 11% a year over the last decade.[189]

Views of Aldi, Lidl GB and Lidl NI on competitive dynamics

4.55 The CMA asked each of Aldi, Lidl GB and Lidl NI for their views on the strength of their competitors' offerings. Further, Aldi, Lidl GB and Lidl NI each submitted evidence on the competitive dynamic between grocery retailers.

4.56 Overall, Aldi, Lidl GB and Lidl NI each described themselves as operating within a competitive grocery market while emphasising that their closest competitors are those with low-price limited assortment models.

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[183] CMA analysis of Grocery Market Share - Worldpanel. 2026 market shares quoted based on data for 12 weeks ending 17/05/2026 and 2020 market shares quoted based on data for 12 weeks ending 02/02/2020. Worldpanel reported that Aldi had a market share of 8.5% in 2020, and Lidl had a market share of 5.4%.
[184] Market shares produced by Mintel and Worldpanel are likely to differ given they use different methodologies and samples of consumers. Estimated market shares of the top 10 grocery retailers are sourced from Mintel, who used company reports and accounts for 2019 to 2025 from Office for National Statistics (ONS). ONS, released 24 October 2025, ONS website, statistical bulletin, Retail sales, Great Britain - Office for National Statistics. The ONS uses the Retail Sales Index (RSI), which is compiled using data from the Monthly Business Survey – Retail Sales Index (MBS-RSI). The RSI covers businesses that are engaged in retail trade and that operate in Great Britain; it does not include Northern Ireland, the Isle of Man or the Channel Islands. Retail sales data are collected from a sample of approximately 5,000 retailers across Great Britain. The sample represents the whole retail sector and includes all large retailers and a representative sample of smaller businesses; the known retail industry population is approximately 200,000 businesses and while the sample represents 2.5% of this population, in terms of the number of businesses the sample represents approximately 75.7% of all known turnover in the retail industry (averaged across October 2024 to September 2025). For September 2025, the Retail Sales Index (RSI) survey response rates were 61.2% based on returned forms, 3.3 percentage points above August 2025. This accounted for 84.1% of total turnover coverage of the sample population.
[185] Mintel (2025), 'Supermarkets – UK – 2025', page 38. We note that Mintel does not distinguish between Lidl GB and Lidl NI and rather refers just to Lidl.
[186] CMA analysis of Mintel (2025), 'Supermarkets – UK – 2025', page 53. UK: leading grocery retailers estimated market share, 2020-25, source: company annual reports and accounts/Mintel.
[187] Lidl NI's response to the CMA's information request [✂].
[188] [✂] submission to the CMA [✂].
[189] New report reveals Lidl Northern Ireland boosted local economy by a record £360m in 2023 as retailer marks 25 years in region - Lidl Northern Ireland, last accessed 22 July 2026.

Aldi

4.57 Aldi stated that ‘consumers clearly understand that discount supermarkets are different and offer smaller ranges’[190] and that it was responsible for greater levels of competition in the grocery market, evidenced by LGRs operating Aldi Price Match schemes.[191]

4.58 It submitted that the growth of Aldi and LADs more generally has helped to intensify competition in the UK grocery sector, increasing choice and driving competitive pricing. Aldi stated that the fact that this has happened while the Order has been in effect demonstrated that the market was working effectively and the regulations as they stand were allowing competition to thrive.[192]

4.59 Aldi stated the UK grocery market was widely regarded as one of the most competitive in the world and that this was a view Aldi strongly shared based on its experience in Great Britain. Aldi stated that this high level of competition was reflected in the diversity of retailer propositions, customer missions and pricing dynamics across the market.[193]

4.60 Aldi stated that it considered competition to operate across different levels:

(a) closest direct competitors (such as Lidl);

(b) broader grocery retailers offering a wider, full-service proposition; and

(c) more specialised or convenience-led operators.[194]

4.61 Aldi submitted that the LGRs each present a ‘Strong’ or ‘Very Strong’ overall grocery offering, materially more extensive than Aldi's in range, format, services and channels, while Aldi's closest competitor remains Lidl as a ‘fellow LAD’.[195]

4.62 Aldi explained that by offering less choice to customers, it can be highly competitive on price across the products that it does stock.[196] Aldi stated that it competes to capture a portion of customers’ overall grocery spend, rather than acting as a full-service alternative to LGRs and seeks to increase the proportion of customers using Aldi for a larger share of their shop.[197]

190 Aldi’s response to the CMA’s ITC, page 2.
191 Aldi’s response to the CMA’s ITC, page 2.
192 Aldi’s submission to the CMA [✂].
193 Aldi’s response to the CMA’s information request [✂].
194 Aldi’s response to the CMA’s information request [✂].
195 Aldi’s response to the CMA’s information request [✂].
196 Note of meeting with Aldi [✂].
197 Note of meeting with Aldi [✂].

Lidl GB

4.63 Lidl GB stated that it deemed the British grocery market to be a competitive market, with a strong competitor set that all, ultimately, compete for overall market share. Lidl GB explained that it systematically monitors the range, quality and pricing of [✂].[198]

4.64 Lidl GB stated that Aldi is its most direct competitor; as a limited assortment discounter it has a similar business model ([✂]).[199] However, Lidl GB stated that it seeks to win customers from across the grocery sector, including LGRs, and that price is the primary driver of its competitiveness.[200]

4.65 Lidl GB stated that while it operates within the same broad grocery market as LGRs, it does so through its significantly different business model, which is fundamentally based on maintaining a limited range. Although Lidl GB aims to meet as many customers' needs as possible within its limited assortment, it does not seek to replicate the comprehensive coverage of a full-range retailer.[201]

Lidl NI

4.66 Lidl NI stated that keeping its overall range size constrained allows it to compete for shoppers conducting a weekly shop, and is a necessity when considering the comparatively smaller size of its stores when compared with LGRs.[202] Lidl NI explained that it compares itself to the retailers in the Northern Irish market but that the retailers it compares itself to vary by category and acknowledged that it cannot compete across all dimensions with all retailers. Lidl NI stated that across the core of its range, it would be comparing itself with the supermarkets that have the largest market share.[203]

4.67 Further, Lidl NI understands that most customers' spend is concentrated on the 20% most demanded items, which is where it aims to compete. It understands that it is less likely to compete on the remaining 80% of items, thereby giving larger retailers an advantage.[204]

4.68 Lidl NI also submitted that its market share growth was primarily driven by:

(a) Rising economic pressure leading customers to switch to Lidl NI for essential needs to benefit from its lower price points.

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[198] Lidl GB's response to the CMA's information request [✂]; and Note of meeting with Lidl GB [✂].
[199] Lidl GB's response to the CMA's information request [✂]; and Note of meeting with Lidl GB [✂].
[200] Note of meeting with Lidl GB [✂].
[201] Note of meeting with Lidl GB [✂].
[202] Note of meeting with Lidl NI [✂].
[203] Note of meeting with Lidl NI [✂]. We note that, as above in paragraph 4.54, based on Kantar data for grocery market shares in Northern Ireland, Lidl NI was the fourth largest grocery retailer in Northern Ireland, behind Tesco, Sainsbury's and Asda. [✂] submission to the CMA [✂].
[204] Note of meeting with Lidl NI [✂].

(b) Customers increasingly recognising its ‘Good-Better-Best’ strategy, where it provides the highest quality at the best price within specific tiers (Entry, Standard, and Premium/Deluxe).

(c) New store openings and marketing, rather than an expansion into ‘full-range’ territory (within the context of the Order).[205]

Third-party views on competitive dynamics

4.69 Across third-party responses, LGRs and other stakeholders consistently describe Aldi, Lidl GB and Lidl NI as significant competitors. They are described as being increasingly substitutable for traditional LGRs for a main grocery shop, exerting clear price pressure and a significant competitive constraint on the wider market. This is seen as reflecting their strengthened proposition (including wider fresh/grocery range and improved in-store offer).

4.70 In relation to LGRs’ ranking of their main competitors in the supply of groceries, the evidence showed that for the relevant stores:[206]

(a) Aldi was ranked as a strong competitor by two LGRs [✂] and [✂] and as a very strong competitor by four LGRs [✂], [✂], [✂], [✂].[207]

(b) Lidl GB was ranked as a moderate competitor by one LGR [✂], as a strong competitor by one LGR [✂], and as a very strong competitor by four LGRs [✂], [✂], [✂], [✂]].[208]

(c) Lidl NI was ranked as a very strong competitor by two LGRs [✂] and [✂] and as a moderate competitor by one other LGR [✂].[209]

(d) Aldi and Lidl GB were ranked by almost all LGRs to be at least as strong as or a stronger competitor than [✂], [✂], [✂], and [✂].

4.71 More generally, evidence from LGRs indicated that they view Aldi, Lidl GB, and Lidl NI as significant competitors:

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205 Lidl NI’s response to the CMA’s information request [✂].
206 Responses to the CMA’s information requests: [✂]. We asked the LGRs to rate how strong each competitors’ offering was on a scale of very weak to very strong. Further, we note that multiple LGRs [[✂], [✂], [✂], [✂], [✂], [✂]] stated that there is limited if any competitor differentiation based on the Grocery Store size.
207 Responses to the CMA’s information requests: [✂].
208 Responses to the CMA’s information requests: [✂].
209 Responses to the CMA’s information requests: [✂]. [✂] and [✂] submitted the same rankings for Lidl for both GB and NI. Specifically, [✂] stated that its response for GB also captured its perspective of competitors within Northern Ireland. [✂] used the following data sources to analyse each retailer’s performance against the five key metrics: Value market share and value growth for larger baskets and switching losses/gains - Worldpanel NI 52w/e to 19 April 2026; Value perception - YouGov net value perceptions, NI, 52w/e to 3 June 2026; and Quality perception - YouGov net quality perceptions, NI, 52w/e to June 2026.

(a) One LGR [✂] submitted, in the context of which retailers it benchmarks against, that its main grocery competitors included Aldi and Lidl GB.[210]

(b) Sainsbury's stated that evidence on consumer shopping behaviour demonstrated that Aldi and Lidl are functionally equivalent to the existing LGRs and substitutable in the eyes of consumers.[211] Further, Sainsbury's said that it competes closely with Aldi and Lidl for customers looking to complete their main grocery shop,[212] and that 'consumers no longer view Aldi or Lidl as 'fringe' retailers to be used simply as a 'top up' shop, as was the case at the time of the 2008 Grocery MI Report'.[213] Additionally, it stated that where an Aldi or Lidl had opened near one of its stores in 2024/25, it observed a decrease in sales, indicating that customers switch 'at least a material proportion of their shop' to Aldi/Lidl.[214]

(c) In one LGR's [✂] analysis [✂], a Lidl opening produced [✂], and an Aldi opening [✂].[215]

(d) One LGR [✂] submitted that its Board regards Aldi and Lidl GB as significant competitors by reference to [✂].[216] The LGR also stated that the extent and regularity of price benchmarking reflected the importance of Aldi and Lidl GB as mainstream competitors. [217] Further, the LGR submitted that by focusing on the items that customers need to complete their 'big weekly shop', Aldi and Lidl GB continue to compete [✂] with Large Grocery Retailers.[218]

(e) Morrisons said there was clear, direct, price competition between the Large Grocery Retailers and Aldi and Lidl GB.[219] Morrisons also highlighted a poll run in 2023 by Pricer (a third-party consumer research provider) that found that 56% of respondents had switched their whole weekly shop to Aldi and Lidl from traditional supermarkets.[220]

(f) One LGR [✂] stated that it is subject to a much wider set of competitive constraints in the Great Britain market. The competitive constraints identified by the LGR included Large Grocery Retailers (as defined in the Order), Aldi and Lidl GB (the LGR noting their significant growth and that they are a major

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210 [✂] response to the CMA's s.174 Notice [✂].
211 Sainsbury's response to the CMA's ITC, paragraph 14.
212 Sainsbury's response to the CMA's ITC, paragraph 42.
213 Sainsbury's response to the CMA's ITC, page 5, paragraph 13. See also paragraph 2.26(a) above.
214 Sainsbury's response to the CMA's ITC, paragraph 13. Sainsbury's noted that references to Lidl in its response to the CMA's ITC include both Lidl Great Britain and Lidl Northern Ireland collectively. Sainsbury's submission to the CMA [✂].
215 Only these [✂] Grocery Retailers were included. For example, [✂] explained that [✂] had not opened stores near any of [✂] stores in recent years. [✂] response to the CMA's information [✂].
216 [✂] response to the CMA's s.174 Notice [✂].
217 [✂] response to the CMA's s.174 Notice [✂].
218 [✂] response to the CMA's information request [✂].
219 Morrisons' response to the CMA's ITC, page 2, point B.
220 Cost-of-living prompts discounter switching: 56% of UK shoppers have switched entire weekly shop to Aldi or Lidl | Pricer, accessed 1 May 2026. Pricer surveyed 1,000 UK shoppers. This article is referenced in Morrisons' response to the CMA's ITC, page 2, part of point A.

competitive force) and others who sell Groceries including certain retailers,[221] local shops and boutique farm shops as well as online retail from Ocado and Amazon.[222] Further, the LGR ranked Aldi as having the strongest competitive offering in Great Britain, ahead of Tesco in second and Lidl GB in third.[223] The LGR also noted that in Northern Ireland, the wider competitor set was smaller but competitors such as Spar and Supervalu (as well as independents) do exercise competitive constraint. Further, the LGR ranked Lidl as having the third strongest competitive offering in Northern Ireland, behind [✂] and [✂], but ahead of [✂].[224]

(g) One LGR [✂], while explaining the benchmarking it does, stated that it operates within a market environment in which Aldi and Lidl GB exert a wider competitive constraint on the market and contributed to downward pressure on prices across the sector.[225] Further, the LGR stated that Aldi and Lidl GB have a strong range across all 'full shop categories and need states'; and had a value-led proposition supported by a high proportion of own-brand products and broad coverage of everyday grocery, household and family shopping needs.[226]

(h) One LGR [✂] stated that Aldi and Lidl directly competed with it across all Grocery Stores within its portfolio, regardless of store size. The LGR stated that, although Aldi and Lidl may have fewer SKUs and branded products, they traditionally lead in price point and sell everything a customer would need for a weekly shop. It also submitted that the latest Worldpanel grocery market share data shows that both Aldi and Lidl GB now each have a larger market share in Great Britain than Morrisons, and that market shares of that scale indicate that they operate as Large Grocery Retailers.[227]

4.72 Other third parties similarly considered that Aldi, Lidl GB, and Lidl NI are significant competitors to LGRs:

(a) Iceland stated that in its view Aldi and Lidl each exert a significant competitive constraint on LGRs and other retailers.[228] Iceland submitted its analysis based on switching data from Worldpanel that 'Aldi has been winning customers from a range of retailers, most notably Asda, Morrisons and Co-op and has been losing customers to Lidl GB, Tesco, Sainsbury's,

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[221] Examples provided of retailers were Iceland, Spar, Premier, Nisa, B&M, Home Bargains, Heron Foods, Farm Foods.
[222] [✂] response to the CMA's information [✂].
[223] [✂] response to the CMA's information request [✂]. [✂] has used [✂] to analyse the competitive constraint posed by competitors (broadly over the last 12 month period), with each retailer's performance against each key metric measured [✂] then combined to provide an overall rank which indicates the strength of their competitive offering.
[224] [✂] response to the CMA's information request [✂].
[225] [✂] response to the CMA's s.174 Notice [✂].
[226] [✂] response to the CMA's information request [✂].
[227] [✂] response to the CMA's information request [✂].
[228] Iceland's response to the CMA's ITC, paragraph 18. Iceland noted that its references to the competitive constraint exerted by Lidl on other LGRs and retailers were intended to relate to Lidl's UK-wide grocery business. Iceland's submission to the CMA [✂].

and to some extent, Iceland. Lidl GB has been winning customers from most retailers including Aldi, Asda, Tesco, Morrisons and to a lesser extent Co-op, Sainsbury's, Waitrose and Iceland.'[229]

(b) The ACS stated that Aldi and Lidl GB's wider fresh and grocery range, food-to-go offer, in-store bakery and self-checkout facilities have strengthened their competitive position and made them more comparable to mainstream grocery retailers than in the past.[230]

4.73 Research by Mintel also indicates that Aldi, Lidl GB, and Lidl NI are significant competitors to LGRs. In a recent report, looking at the UK grocery and supermarket sector, Mintel stated that the leading supermarket players were continuing to experience intense competition from other channels, particularly Aldi and Lidl, due to their ongoing appeal to value-conscious shoppers. Further, Mintel stated that Aldi and Lidl have been building market share at the expense of some traditional mainstream players, particularly Asda and Morrisons. It stated that their value positioning resonates with cost-conscious shoppers and has forced the 'big four' to intensify price-matching and loyalty-scheme activity.[231]

Price

4.74 This section sets out evidence on how each of Aldi, Lidl GB and Lidl NI's prices compare to the LGRs'. This evidence is from Which? Analysis, price benchmarking and from price matching schemes.

4.75 The evidence shows that each of Aldi, Lidl GB and Lidl NI has lower prices overall than the LGRs, although on a narrower range of products some LGRs have price matching schemes against Aldi or Lidl GB.

Price comparisons

4.76 The CMA considers evidence from the following sources: Which? analysis, price benchmarking carried out by Aldi, Lidl GB and Lidl NI, and price benchmarking carried out and price matching schemes implemented by the LGRs.

4.77 We note that these various comparisons of prices (ie the Which? analysis and price benchmarking) are not consistent with each other in terms of methodology –

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[229] Iceland's response to the CMA's ITC, paragraph 14. Iceland noted that the switching data from Worldpanel on which its internal analysis was based was GB-wide and that Iceland would expect there to be a degree of customer switching across Aldi, Lidl and other retailers in NI too. Iceland's submission to the CMA [✄]. See also Iceland's submission to the CMA [✄]: Iceland submitted that the purpose of the graphics was to depict how shopper spend has moved year-on-year from other retailers to Aldi and Lidl. Iceland used data from Worldpanel, which analyses shopper trends and behaviours: Iceland assessed 13 Worldpanel data releases for each of Aldi and Lidl, which covered a 26-month period from 29/01/2024 to 22/03/2026, to understand switching patterns covering the period 27/01/2025 to 22/03/2026 versus the equivalent days in the 12 months prior to that, namely 29/01/2024 to 23/03/2025.

[230] ACS's response to the CMA's ITC, page 2.

[231] Mintel (2025), Supermarkets – UK – 2025, pages 17 to 19. We note that Mintel does not distinguish between Lidl GB and Lidl NI and rather refers just to Lidl.

there are important differences, particularly in terms of the purpose of the comparison, the products covered and whether results were weighted according to sales.

4.78 The Which? analysis and evidence on benchmarking show each of Aldi, Lidl GB and Lidl NI to be the lowest priced supermarkets. When comparing their prices to the LGRs', the smallest price gap reported was [5-10]% (based on the comparisons received the LGRs were at least [5-10]% more expensive than each of Aldi, Lidl GB and Lidl NI).

Which? analysis

4.79 Every month Which? 'compares thousands of prices at eight of the UK's 'major supermarkets': Aldi, Asda, Lidl, Morrisons, Ocado,[232] Sainsbury's, Tesco and Waitrose.'[233] For April 2026, Which? compared the price of a basket of 96 items between the supermarkets and found:[234]

(a) Aldi was the cheapest supermarket with the list costing an average of £172.77.

(b) Lidl (with Lidl Plus) was second with an average price of £175.20.

(c) Asda, Tesco (with Clubcard), Sainsbury's (with Nectar) and Morrisons (in that order) are the next cheapest supermarkets with average basket costs of between £197.91 and £205.31. These averages are between 15 and 19% more expensive than Aldi and between 13 and 17% more expensive than Lidl.[235]

(d) Waitrose was the most expensive supermarket with an average price of £242.04.[236] That was 40% greater than Aldi, 38% greater than Lidl and 18% above Morrisons, the next most expensive LGR.[237]

Price benchmarking and matching schemes

4.80 As part of its evidence gathering on the relative pricing of Aldi, Lidl GB and Lidl NI compared with the LGRs, the CMA requested information regarding their internal

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[232] Ocado Retail Limited (**Ocado**).
[233] Using data supplied by an independent price comparison company (and fieldworkers for stores that do not have online prices), Which? tracks the prices of up to 200 branded and own-label products every day over the course of a month to work out the average cost per item. Which? then adds up those averages to get a total for each retailer. Which? includes special offers and, since June 2024, loyalty prices where applicable, but not multibuys or the value of points, personalised discounts or other rewards. Products on Which?'s list include everything from Heinz baked beans and Mr Kipling cakes to own-label milk, bread and cheese; Supermarket prices: which is the cheapest supermarket in 2026? - Which?, accessed 22 July 2026.
[234] Which? also compare the cost of a longer list of items, including a wide range of branded items not typically stocked at Aldi and Lidl.
[235] CMA analysis of Which? Data.
[236] Supermarket prices: which is the cheapest supermarket in 2026? - Which?, accessed 22 July 2026.
[237] CMA analysis of Which? Data.

grocery price benchmarking and any price matching activity.[238] The CMA considers this evidence to be relevant not only to the assessment of relative prices but also to the extent of competitive constraint exerted by Aldi, Lidl GB and Lidl NI on LGRs. In particular, where an LGR benchmarks against, or matches prices offered by, another Grocery Retailer, the CMA considers that this is consistent with that LGR seeing that Grocery Retailer as a notable competitive constraint.

4.81 The evidence below shows that Aldi and, to a lesser extent, Lidl GB play an important role in the pricing frameworks of the LGRs, including through ongoing benchmarking and targeted price matching.

4.82 In relation to Aldi, Lidl GB, and Lidl NI benchmarking grocery prices against LGRs, the evidence showed that:[239]

(a) Aldi benchmarks against [✂]. Aldi stated that benchmarking ensured that it continued to offer a clear price discount relative to the wider market. Aldi matches its own products against [✂]. Aldi will match and, in turn, price against [✂]. Aldi [✂].[240]

(b) Lidl GB benchmarks against [✂]. Lidl GB stated that this ensures that Lidl GB remained competitive on retail prices in the GB market. It also tracks the average percentage differential between itself and [✂]. Lidl GB does this for [✂]. Lidl GB [✂].[241]

(c) Lidl NI benchmarks against [✂]. Lidl NI stated that the purpose was to ensure Lidl NI offered market leading value. Lidl NI stated that [✂] price checks and quality benchmarking were completed on [✂].[242] Further, Lidl NI emphasised that it continues to position itself as cheaper than its competitors.[243]

4.83 Through this benchmarking, Aldi, Lidl GB and Lidl NI identified, during the period from 1 March 2025 to 28 February 2026, that their prices were lower than LGRs.

(a) Aldi found it was at least [10-20]% cheaper than the LGRs it benchmarked against. Further, Aldi noted that [✂].[244]

(b) Lidl GB found it was on average [10-20]% cheaper than [✂].[245] Lidl GB also told us that on average, a basket of goods at Lidl GB is typically priced around [10–20]% below that of LGRs.[246]

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[238] See Appendix A, Tables 1.5, 1.6, and 1.7, for further detail.
[239] See Appendix A, Table 1.5, for further detail.
[240] Aldi's response to the CMA's s.174 Notice [✂].
[241] Lidl GB's response to the CMA's s.174 Notice [✂].
[242] Lidl NI's response to the CMA's s.174 Notice [✂].
[243] Note of meeting with Lidl NI [✂].
[244] Aldi's response to the CMA's s.174 Notice [✂].
[245] Lidl GB's response to the CMA's s.174 Notice [✂].
[246] Note of meeting with Lidl GB [✂].

(c) Lidl NI found it was at least [5-10]% cheaper than the LGRs it benchmarked against.[247]

4.84 In relation to LGRs benchmarking grocery prices against Aldi, Lidl GB and Lidl NI, the evidence showed that:[248]

(a) Five of the LGRs regularly benchmark to Aldi and Lidl GB and [✂] benchmarking also included Lidl NI. These LGRs use these benchmarks and price indexes to measure relative price competitiveness compared with other grocery retailers.[249]

(b) Another LGR [✂] submitted that it did not specifically benchmark prices against Aldi or Lidl GB but that it did monitor broader market pricing and competitive dynamics across the grocery sector, including through third-party data providers and internal analysis. As part of this, Aldi and Lidl GB were relevant reference points within the wider competitive landscape, particularly given their role in shaping customer expectations on price.[250]

(c) The final LGR [✂] stated that it did not directly benchmark product prices against Aldi and Lidl GB. Rather, it has a strategic focus on other competitors. However, it also said that over the last year it had compared prices to Aldi and Lidl GB, alongside other competitors, as part of two ad hoc analyses.[251]

4.85 Through this benchmarking LGRs found Aldi and Lidl GB to be cheaper. Specifically, that Aldi's prices were at least [5-10]% lower and that Lidl GB's prices were at least [5-10]% lower.[252] None of the LGRs monitored Lidl NI's prices separately from Lidl GB's.

4.86 In relation to LGRs implementing explicit price matching (or equivalent schemes) on the basis of prices offered by Aldi or Lidl GB, the evidence showed that:[253]

(a) Four of the seven LGRs have an explicit price matching scheme, with three of these being an Aldi Price Match and the other LGR having schemes against Aldi and Lidl GB.[254]

(b) The number of Groceries SKUs covered in price matching schemes varied between LGRs, ranging from over 100 SKUs in Co-op to over 800 SKUs in Sainsbury's. The LGRs stated that the Groceries SKUs that are included in

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[247] Lidl NI's response to the CMA's s.174 Notice [✂].
[248] See Appendix A, Table 1.6, for further detail.
[249] Responses to the CMA's s.174 Notice: [✂].
[250] [✂] response to the CMA's s.174 Notice [✂].
[251] [✂] response to the CMA's s.174 Notice [✂]. [✂] noted that its responses related to Lidl GB only. [✂] response to the CMA's information request [✂].
[252] See Appendix A, Table 1.8, for further detail.
[253] See Appendix A, Table 1.7, for further detail.
[254] Responses to the CMA's s.174 Notice: [✂].

the price matching schemes include everyday essentials, best sellers, and core consumer items.[255]

(c) Three grocery retailers Sainsbury's, Morrisons and Iceland highlighted that price match schemes mean that LGRs offer a range of grocery products at similar prices to Aldi and Lidl GB.[256]

Store size and geographic presence

4.87 This sub-section sets out evidence on the size and geographic presence of stores operated by each of Aldi, Lidl GB and Lidl NI in the UK. This evidence is relevant to our assessment of whether Aldi, Lidl GB and/or Lidl NI operates 'Larger Grocery Stores throughout either Great Britain or Northern Ireland or both or in a considerable part or parts of the United Kingdom'.

4.88 The CMA gathered data directly from each of Aldi, Lidl GB and Lidl NI for the purpose of assessing the size and geographic presence of their stores.[257] Table 4.4 sets out an overview, based on our assessment of data submitted to us by Aldi, Lidl GB and Lidl NI, of the number and size of stores that they operate in the UK.[258]

Table 4.4: **Store size and coverage of Aldi, Lidl GB and Lidl NI**

Metric	Aldi	Lidl GB	Lidl NI
Number of grocery stores operated in GB	1,085	1,016	0
A. Number of grocery stores operated in England	908	842	0
B. Number of grocery stores operated in Scotland	112	113	0
C. Number of grocery stores operated in Wales	65	61	0
Number of grocery stores operated in NI	0	0	44
Number of grocery stores with a Net Sales Area > 1,000 sqm	785	881	35
Proportion of stores with a Net Sales Area > 1,000 sqm (%)	72%	87%	80%
Average size of grocery stores (sqm)	1,080	1,225	1,262

Source: CMA analysis of Aldi's, Lidl GB's and Lidl NI's responses to the CMA's s.174 notices.

4.89 As shown in Table 4.4:

(a) Aldi operates more than 1,000 stores across Great Britain.[259] Whilst it does not operate stores in Northern Ireland, it maintains a significant presence

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[255] Responses to the CMA's s.174 Notice: [✂].
[256] Sainsbury's' response to the CMA's ITC, paragraph 22; Morrisons' response to the CMA's ITC, page 2; Iceland's response to the CMA's ITC, paragraph 15.
[257] Aldi's response to the CMA's s.174 Notice [✂]; Aldi's response to the CMA's s.174 Notice [✂]; Lidl GB's response to the CMA's s.174 Notice [✂]; Lidl GB's response to the CMA's s.174 Notice [✂]; Lidl NI's response to the CMA's s.174 Notice [✂]; and Lidl NI's response to the CMA's s.174 Notice [✂].
[258] As of 28 February 2026, based on data supplied to the CMA by Aldi, Lidl GB and Lidl NI.
[259] For an approximate illustration of the presence of Aldi's stores across Great Britain, see Iceland's response to the CMA's ITC, page 4, figure 1.

throughout England, Scotland and Wales.[260] The large majority of its stores in Great Britain (72%) possess a Net Sales Area greater than 1,000 sqm.

(b) Lidl GB operates more than 1,000 stores across Great Britain.[261] Whilst it does not operate stores in Northern Ireland, it maintains a significant presence throughout England, Scotland and Wales.[262] The large majority of its stores in Great Britain (87%) possess a Net Sales Area greater than 1,000 sqm.

(c) Whilst Lidl NI does not operate stores in England, Scotland or Wales, it operates more than 40 stores throughout Northern Ireland and maintains a significant presence there.[263, 264] The large majority of its stores in Northern Ireland (80%) possess a Net Sales Area greater than 1,000 sqm.

Integrated grocery wholesaling function

4.90 Each of Aldi, Lidl GB and Lidl NI made submissions to the CMA about how they procure groceries.

Aldi

4.91 Aldi submitted that it [✂] procures directly from grocery suppliers. In the UK, this is mainly done via its UK Buying and Support Service Teams, [✂].[265] Aldi told us that its sourcing had shifted since 2010, with British sourced products now making up a greater proportion of its range.[266] Aldi explained that its UK Buying Department focuses on the buying process (including supplier management, negotiations, sampling etc.). In addition to its UK teams, Aldi's Global Sourcing and International Buying Teams also source [✂] for UK stores, using [✂].[267]

4.92 Aldi further submitted that [✂] SKUs [✂] are sourced through independent intermediaries or buying groups. It explained that these intermediaries were

[260] Aldi recently announced that it was aiming to open 40 new stores in Great Britain this year, as it works towards its long-term goal of operating 1,500 stores in the UK; Aldi announces over £370 million investment in opening new stores, accessed 12 May 2026. Aldi has stated minimum size requirements of 18,000 square feet (1,672 sqm) for new sites located outside of London, and 8,000 square feet (743 sqm) for sites located in London; Required towns, accessed 12 May 2026.
[261] For an approximate illustration of the presence of Lidl GB's stores across Great Britain, see Iceland's response to the CMA's ITC, page 5, figure 2.
[262] Lidl GB aims to open 50 new stores in Great Britain by April 2027; Lidl GB announces ambitious expansion plans with over 50 new stores set to open in next 12 months, accessed 12 May 2026. The stated minimum size requirements for new sites is 18,000 square feet (1,672 sqm); New store site requirements, accessed 12 May 2026.
[263] For an approximate illustration of the presence of Lidl NI's stores across Northern Ireland, see Iceland's response to the CMA's ITC, page 5, figure 2.
[264] Lidl NI plans to increase its overall footprint to more than 60 stores across Northern Ireland by 2032; Lidl's economic contribution in Northern Ireland to rise by almost half-a-billion pounds per year, accessed 12 May 2026. In Ireland and Northern Ireland, Lidl requires sites that possess a sales area of 500-1,700 sqm; Location criteria, accessed 12 May 2026.
[265] Aldi's response to the CMA's s.174 Notice [✂].
[266] Note of meeting with Aldi [✂].
[267] Aldi's response to the CMA's s.174 Notice [✂]. Aldi's response to the CMA's s.174 Notice [✂].

generally agents, acting on behalf of smaller factories or suppliers based outside of the UK who often do not have a sales team.[268]

Lidl GB

4.93 Lidl GB submitted that it buys directly from grocery suppliers, and that it does not buy any products through independent intermediaries, wholesalers or buying groups. It told the CMA that the [✂] of its range is procured directly by the Lidl GB buying team [✂] with the remainder procured on behalf of Lidl GB by either the Lidl Stiftung & Co. KG Buying team, based in Germany, or by the buying teams of other Lidl country companies.[269]

Lidl NI

4.94 Lidl NI submitted that it purchases products directly from grocery suppliers and it does not buy any products through an independent intermediary, wholesaler or buying group. Lidl NI submitted that it uses purchasing services provided by Lidl Stiftung & Co. KG, which itself develops and sources products potentially suitable for various markets, partially collaborating with other national Lidl subsidiaries (such that Lidl NI procures a range of SKUs sourced via Lidl GB).[270] For operational efficiency, all procurement functions and coordination with group service providers for Lidl NI are executed by the Lidl Ireland GmbH buying team.[271]

[268] Aldi's response to the CMA's s.174 Notice [✂].
[269] Lidl GB's response to the CMA's s.174 Notice [✂]; and Lidl GB's response to the CMA's s.174 Notice [✂].
[270] Lidl NI's response to the CMA's s.174 Notice [✂]; and Lidl NI's response to the CMA's s.174 Notice [✂].
[271] Lidl NI's response to the CMA's s.174 Notice [✂].

5. Our provisional assessment

Introduction

5.1 This section sets out our provisional assessment of whether each of Aldi, Lidl GB and Lidl NI:

(a) meets the definition of a LAD set out in the Order; and, if not,

(b) meets the LGR designation criteria set out in Article 3(4) of the Order.

Whether Aldi, Lidl GB and Lidl NI meet the definition of a LAD: provisional assessment

5.2 As noted in Section 2 above, a LAD is defined as 'a Grocery Retailer which sells a significantly more limited range of Groceries than a Large Grocery Retailer at a low price'.[272] Accordingly, the CMA considers each of the two limbs of this definition in relation to each of Aldi, Lidl GB and Lidl NI in turn below.

Whether each of Aldi, Lidl GB and Lidl NI sell a significantly more limited range of Groceries than a Large Grocery Retailer: provisional assessment

5.3 As set out in the framework for designation section (see paragraphs 2.22 to 2.26), the CMA considers two types of evidence relevant to this limb of the LAD definition:

(a) Evidence on a Grocery Retailer's product range as compared to LGRs. This includes the number of SKUs stocked by each of Aldi, Lidl GB and Lidl NI, the range strategies and the extent to which these SKU numbers comprise own-branded SKUs, the identification of any material gaps in the ranges of each retailer and evidence on the business models of each retailer; and

(b) Evidence on the implications of differences in ranges as compared with the LGRs. This includes the extent to which customers can complete a main weekly shop at a retailer, and the degree of competitive constraint exerted by each of Aldi, Lidl GB and Lidl NI on the LGRs.

5.4 This section addresses first the evidence on a Grocery Retailer's product range, and then the evidence on the implications of differences in range.

[272] Order, Article 2(1).

Evidence on a Grocery Retailer's product range

5.5 The CMA has considered a range of evidence on product range. Consistent with the CC's approach in the Final Report, the CMA's starting point is SKU count, since a higher number of SKUs will generally indicate a broader range. However, SKU count does not, on its own, provide a complete picture. It may not reflect, for example, the extent to which a Grocery Retailer stocks multiple brands of the same product, or whether its offer is concentrated in particular types of products. The CMA has therefore considered SKU count alongside other evidence, including the role of own-brand products in Aldi's, Lidl GB's and Lidl NI's range strategies, and whether there are any material gaps in their ranges that may not be apparent from SKU numbers alone.

5.6 This approach is consistent with the CC's approach in the Final Report. In particular, the CC recognised that it is possible to offer a product range broadly comparable to an LGR with a substantially lower SKU count where there is greater reliance on own-brand products (see, for example, paragraphs 2.3 and 2.42). In addition, when considering frozen food stores, the CC specifically noted that those stores carried a limited range of non-frozen grocery products when considering if they were in the same market as LGRs.[273]

Number of SKUs

5.7 The CMA provisionally finds that each of Aldi, Lidl GB and Lidl NI has seen a significant increase in overall number of SKUs since the CC's Final Report. Specifically:

(a) Aldi stocks an average of [4,000-5,000] SKUs (including flavour variant products and non-core SKUs) in its stores with a Net Sales Area of between 1,000 and 2,000 sqm (see Table 4.1). This represents a substantial increase from the approximately 850 core SKUs in each of its stores identified in the Final Report.[274]

(b) Lidl GB stocks an average of [4,000-5,000] SKUs in its stores with a Net Sales Area of between 1,000 and 2,000 sqm (see Table 4.1). This represents a substantial increase from the 1,000 SKUs identified in the Final Report (noting that this was a UK-wide figure for stores ranging from 500 to 1,400 sqm).[275]

[273] Final Report, paragraph 4.82.
[274] The CMA acknowledges that it is unclear if the reference to 'core SKUs' in the Final Report relates to only certain SKUs and how multiple flavour variants are accounted for. However, even the [2,000-3,000] core products reported by Aldi (see footnote 80 above) (ie excluding products that were seasonal, regional, trial, limited one-off, or otherwise temporary and not splitting out flavour variants) represents a substantial increase from the figure set out in the Final Report (see paragraph 4.11). Final Report, Appendix 3.1, paragraph 33.
[275] Final Report, Appendix 3.1, paragraph 34. It is not clear whether these figures submitted to the CC were for SKUs at the case level, ie potentially including multiple flavour variants, or were for individual variants.

(c) Lidl NI stocks an average of [4,000-5,000] SKUs in its stores with a Net Sales Area of between 1,000 and 2,000 sqm (see Table 4.1). This represents a substantial increase from the 1,000 SKUs identified in the Final Report (again noting that this was a UK-wide figure for stores ranging from 500 to 1,400 sqm).[276]

5.8 The CMA provisionally finds that the gap in SKU numbers between each of Aldi, Lidl GB and Lidl NI and LGRs has also narrowed. In stores of comparable size,[277] as set out in more detail in paragraphs 4.7 to 4.12:

(a) At the time of the CC's Final Report, Aldi stocked approximately 850 core SKUs compared with around 5,000 to 10,000 SKUs typically stocked by LGRs. Aldi therefore stocked fewer than one fifth of the SKUs typically stocked by LGRs at that time.[278] By contrast, Aldi now stocks an average of [4,000-5,000] SKUs in stores with a Net Sales Area of 1,000 to 2,000 sqm, which is approximately [✂] of the SKU count of the LGR with the lowest average number of SKUs (M&S, with [6,000-7,000] SKUs on average in stores with a Net Sales Area of 1,000 to 2,000 sqm) (see Table 4.1).[279] Aldi's SKU count is also [✂] of the LGRs with the second and third lowest SKU counts, and [✂] of the SKU count of LGRs with the highest SKU counts (see Table 4.1). Aldi submitted that LGRs have core ranges between 20,000 and 30,000 SKUs which would be 10 to 15 times larger than Aldi's core range.[280] However, that submission is not supported by the evidence obtained by the CMA for LGR stores with a Net Sales Area of 1,000 to 2,000 sqm. No LGR had an average SKU count (including core and non-core range) for those stores over 20,000 (see Table 4.1).

(b) At the time of the CC's Final Report, Lidl stocked around 1,000 different products, compared with around 5,000 to 10,000 SKUs typically stocked by LGRs. Lidl therefore stocked, at most, around one fifth of the SKUs typically stocked by LGRs at the time.[281]

(i) By comparison, Lidl GB now stocks on average [4,000-5,000] SKUs in stores with a Net Sales Area if 1,000 to 2,000 sqm. This is [✂] of the SKU count of the LGR with the lowest average number of SKUs (M&S, with [6,000-7,000] SKUs on average in stores with a Net Sales Area of 1,000 to 2,000 sqm) (see Table 4.1). Lidl GB's SKU count is also [✂] of

[276] Final Report, Appendix 3.1, paragraph 34. It is not clear whether these figures submitted to the CC were for SKUs at the case level, ie potentially including multiple flavour variants, or were for individual variants.
[277] In the Final Report this was for stores with NSA of 500 to 1,400 sqm and in our recent evidence gathering stores with NSA of 1,000 to 2,000 sqm.
[278] Final Report, paragraph 4.80.
[279] This narrowing remains material even when Aldi's current core range is assessed using a case-level SKU count (rather than counting flavour variants separately). On that basis, Aldi's SKU count would still be around [✂] of the SKU count of the LGR with the lowest average number of SKUs.
[280] Aldi's response to the CMA's ITC, page 2.
[281] Final Report, paragraph 4.80.

the LGRs with the second and third lowest SKU counts, and [✂] of the SKU count of LGRs with the highest SKU counts (see Table 4.1).

(ii) Lidl NI now stocks on average [4,000-5,000] SKUs in stores with a Net Sales Area of 1,000 to 2,000 sqm. While Lidl NI submitted that this is considerably lower than the LGRs,[282] it is [✂] of the SKU count of the LGR with the lowest average number of SKUs (M&S with [6,000-7,000] SKUs on average in stores with a Net Sales Area of 1,000 to 2,000 sqm) (see Table 4.1 and paragraph 4.12)). Lidl NI's SKU count is likewise [✂] of the LGRs with the second and third fewest SKU counts, and [✂] of the SKU count of the LGRs with the highest SKU counts (see Table 4.1).

Range strategies and own-branded products

5.9 The CMA provisionally finds that Aldi, Lidl GB and Lidl NI each operate range strategies that are primarily focused on own-brand products. In respect of each retailer:

(a) Aldi stocks approximately [3,600-5,000] own-brand SKUs in its stores with a Net Sales Area of between 1,000 and 2,000 sqm. This is a greater number than [✂] LGRs (see Table 4.2);

(b) Lidl GB stocks approximately [3,200-4,500] own-brand SKUs on average in stores with a Net Sales Area of between 1,000 and 2,000 sqm. This is a greater number than [✂] LGRs (see Table 4.2); and

(c) Lidl NI stocks approximately [3,200-4,500] own-brand SKUs in its stores with a Net Sales Area of between 1,000 and 2,000 sqm. This is a greater number than [✂] LGRs (see Table 4.2).

5.10 This indicates that much of the differences between the SKU counts of each of Aldi, Lidl GB and Lidl NI and those of LGRs may be accounted for by differences in approaches to stocking branded products.

5.11 The CMA provisionally considers that a limited presence of branded products does not constitute a materially limited grocery range, particularly where the retailer offers products across the core grocery categories. This is consistent with the Final Report, in which the CC recognised that a retailer can offer a product range broadly comparable to that of an LGR even where its range consists of own-brand products (see, for example, paragraphs 2.3 and 2.42). In the CMA's view, therefore, when assessing whether a retailer sells a significantly more limited range of Groceries than an LGR, the absence of material product categories or product types from a retailer's range is of much greater significance than the

[282] Note of meeting with Lidl NI [✂].

absence or reduced presence of products from particular supplier types (such as branded suppliers).

Material gaps in ranges

5.12 The CMA identified no material gaps in Aldi's (see paragraphs 4.20 to 4.24), Lidl GB's (see paragraphs 4.25 to 4.27) or Lidl NI's (see paragraphs 4.28 to 4.32) ranges at the level of the broad product categories of Groceries as defined in the Order or the product categories set out in the CC's Final report (see paragraphs 4.16 to 4.17). This is supported by each of the retailers' own explanations of their ranges:

(a) Aldi explained that it offers a basic range within most categories but does not provide the same depth or variety of range as LGRs, including in areas such as free-from, organic, international cuisines, exotic fruits and vegetables, and health and beauty products.[283]

(b) Lidl GB explained that its relatively small number of SKUs was sufficient to meet the majority of customers' grocery needs but highlighted certain areas such as free-from or world foods as examples of areas that it does not cover.[284]

(c) Lidl NI explained that it covers all the needs for a family's weekly shop but that it lacks the choice available at an LGR;[285] for example, Lidl NI cited gaps in its organic and gluten free ranges.[286]

5.13 While there are gaps in each of their ranges relative to the LGRs, as set out in their respective submissions (see paragraphs 4.22, 4.26 and 4.29), the CMA considers these gaps are not sufficient to conclude that their ranges are significantly more limited than those of LGRs. Further, the CMA notes that each of Aldi, Lidl GB and Lidl NI offers products in each category of Groceries as defined in the Order and in each of the nine broad categories considered by the CC in its Final Report. In addition, in relation to points made by Aldi (paragraph 4.22), Lidl GB (paragraph 4.26) and Lidl NI (paragraph 4.29), that they do not offer specialist butcher or fishmonger counters, the Order does not require any of those products to be provided via specialist counters.

5.14 Each of Aldi, Lidl GB and Lidl NI submitted survey evidence that showed that consumers perceived their respective range as [✂] than those of the LGRs. However, the CMA considers that this survey evidence is mixed: while consumers

[283] Aldi's submission to the CMA [✂].
[284] Note of meeting with Lidl GB [✂].
[285] Note of meeting with Lidl NI [✂].
[286] Note of meeting with Lidl NI [✂].

view their ranges less favourably than some LGRs, they view them similarly to, or more favourably than others.

(a) As set out in paragraph 4.23, Aldi submitted that it ranks [✂]. However, it ranks above [✂] and its score is similar to [✂] score especially when looked at over a longer period.[287]

(b) As set out in paragraph 4.27, Lidl GB submitted both external market research and its own internal analysis on perceptions of its capability to meet the requirements of a full weekly shop, and submitted that its core product range was typically around one-tenth of the size of the LGRs (see paragraph 4.26).[288] However, it was ranked ahead of [✂] and [✂] on whether 'the store sells the right range of products to suit my needs.' Although Lidl GB had the [✂] score on a moving annual total basis for customers' ability to complete a full grocery shop, its score is similar to [✂].[289]

(c) As set out in paragraph 4.31, Lidl NI submitted internal survey evidence showing that consumers perceived its range less favourably than those [✂] of [✂], [✂] and [✂]. However, Lidl NI's score was similar to [✂] and [✂] [✂],with [✂] scoring [✂]. Further, while Lidl NI ranked below [✂] and [✂] for most of the last two years, it has ranked above both retailers during parts of 2025.[290]

Business models

5.15 As noted in Section 2, the CMA considers that the signal conveyed to customers about the range and type of products available at a Grocery Retailer is a relevant consideration as to whether that retailer is a LAD, particularly where a limited range is central to its business model,

5.16 Aldi, Lidl GB and Lidl NI submitted that, despite increasing the number of SKUs they offer, their business models have not materially changed since the Order came into force. They said that they continue to operate as limited assortment discount retailers, with their core proposition and strategic positioning remaining substantially unchanged. They each also said that consumers viewed them differently to the LGRs due to their more limited ranges. Aldi and Lidl GB also pointed to their lack of (among other things) an e-commerce offering, as evidence that their respective business models differ from those of the LGRs (see paragraph 4.36 above). Aldi and Lidl GB also each flagged the other as their closest competitor (see paragraphs 4.60(a) and 4.64 above).

[287] Aldi's response to the CMA's s.174 Notice [✂].
[288] Note of meeting with Lidl GB [✂].
[289] Lidl GB's response to the CMA's s.174 Notice [✂].
[290] Lidl NI response to the CMA's s.174 Notice [✂].

5.17 The CMA accepts that Aldi, Lidl GB and Lidl NI continue to operate business models that differ, to some extent, from those of the existing LGRs. However, as the CMA has provisionally found, the SKU gaps between each of Aldi, Lidl GB and Lidl NI and LGRs have narrowed since the CC's Final Report (see paragraphs 5.7 to 5.8). Further, as seen below at paragraphs 5.19 to 5.35, the evidence indicates that the respective ranges of Aldi, Lidl GB and Lidl NI do not prevent customers from completing a main weekly shop at those retailers, nor prevent Aldi, Lidl GB and Lidl NI from exerting a material competitive constraint on the LGRs. Indeed, the marketing materials and statements of each of Aldi, Lidl GB and Lidl NI also emphasise the suitability of their respective stores for completion of a weekly shop (see below at paragraph 5.21). The CMA considers this is relevant to the signal now conveyed to customers about the range and type of products they can expect to be available at Aldi, Lidl GB and Lidl NI.[291]

5.18 The CMA provisionally considers that a distinct business model can be entirely consistent with not being a LAD under the Order. The CMA also notes (see paragraph 5.63 to 5.66 below) that existing LGRs themselves exhibit material variation in business models and strategies.

Evidence on the implications of differences in range

5.19 The CMA has considered, alongside the evidence on product range above, evidence on the practical significance of any remaining differences in range compared with the LGRs.

5.20 First, the CMA has considered whether consumers are able to complete a main weekly shop at each of Aldi, Lidl GB and Lidl NI. This is in the context of the Sainsbury's/Asda merger investigation, where the weekly shop was the most common shopping mission[292] and a 2025 Mintel report explaining that 49% of UK grocery shoppers do a main shop and combine it with frequent top-ups and 43% do one main shop.[293]

5.21 In this context and given consumers can complete a main weekly shop at an LGR, evidence that they can also do so at Aldi, Lidl GB and Lidl NI indicates that the range sold by those Grocery Retailers is not 'significantly more limited' than those of the LGRs. The CMA has considered evidence from the marketing material of Aldi, Lidl GB and Lidl NI, as well as analysis of consumer shopping behaviour submitted to the CMA by Grocery Retailers.

5.22 Second, the CMA has had regard to the purpose of the LADs definition set out in the Order. The CC's analysis reflected a view that the LADs' significantly more limited ranges constrained their ability to compete with LGRs. As such, if Aldi, Lidl

[291] The CMA also notes in this regard the evidence regarding customer perceptions of range at paragraph 5.14 above.
[292] Sainsbury's/Asda final report, paragraph 4.12.
[293] Mintel (2025), 'Supermarkets – UK – 2025', page 21.

GB and/or Lidl NI exert a material competitive constraint on the LGRs, this indicates that they no longer offer a 'significantly more limited range of Groceries' than the LGRs. Against that framework, the CMA considers it relevant to assess the extent to which any of Aldi, Lidl GB and Lidl NI now offer a sufficient range to constrain the LGRs in practice.

Suitable destinations for a main weekly shop

5.23 The CMA provisionally finds that Aldi, Lidl GB and Lidl NI's own marketing and statements about range indicate that they are suitable destinations for a main weekly shop (see paragraph 4.40). In addition, the CMA provisionally finds that consumer spending evidence indicates both Aldi and Lidl GB are used by a significant number of shoppers for main grocery missions (see paragraphs 4.41 to 4.42 and Table 4.3 above):

(a) Aldi's marketing materials, including statements on its website, state that it provides everything shoppers need for their big weekly shop (see paragraph 4.40(a)). This is consistent with other analysis on consumer spending.[294] For example, one LGR [[✂]] submitted data showing that Aldi ranked third among rival grocery retailers for main shops and that Aldi's share for main shops was higher than its share across all shopping missions.[295] Similarly, a 2025 Mintel report found Aldi had the fourth largest share of UK respondents using them for their main grocery shopping.[296] Sainsbury's submitted one piece of analysis showing that, amongst non-Sainsbury's shoppers, Aldi again ranks third for main shops.[297] Sainsbury's submitted a second piece of analysis, provided by Worldpanel, showing that [50-60]% of Aldi's volumes were sold as part of a main shop in the financial year 2025/26 which was a higher proportion than any LGR.[298]

(b) Lidl GB's marketing materials, including statements on its website, state that shoppers will find all they need for their weekly shop in its stores (see paragraph 4.40(b)). This is consistent with other analysis on consumer spending.[299] For example, one LGR [[✂]] submitted data showing that Lidl GB ranked fifth among rival grocery retailers for main shops and Lidl GB's shares for main shops were higher than its share across all shopping missions.[300] Similarly, a 2025 Mintel report found Lidl had the fifth largest share of UK respondents using them for their main grocery shopping.[301]

[294] This is also consistent with the views of most third parties, including some of the LGRs and the ACS. See paragraphs 4.34 and 4.35.
[295] [✂] submission to the CMA [✂].
[296] Mintel (2025), 'Supermarkets – UK – 2025', page 22.
[297] Sainsbury's response to the CMA's ITC, page 5, paragraph 13.
[298] Sainsbury's response to CMA's information request [✂].
[299] This is also consistent with the views of most third parties, including some of the LGRs and the ACS. One third party, a consumer that responded to our ITC, noted limitations of Lidl's range. See paragraphs 4.33 to 4.34.
[300] [✂] submission to the CMA [✂].
[301] Mintel (2025), 'Supermarkets – UK – 2025', page 22. We note that the data is for the UK and Mintel does not distinguish between Lidl GB and Lidl NI and refers just to Lidl.

Sainsbury's also submitted one piece of analysis showing that, amongst non-Sainsbury's shoppers, Lidl GB ranks fifth among rival grocery retailers for main shops.[302] Sainsbury's submitted a second piece of analysis, provided by Worldpanel, showing that [40-50]% of Lidl GB's volumes were sold as part of a main shop in the financial year 2025/26 which was a higher proportion than five out of seven LGRs.[303]

(c) Lidl NI's statements that its range covers all the needs for a family's weekly shop, and its marketing materials on its website (see paragraph 4.40(c)), suggest that it believes consumers should view Lidl NI as a suitable destination for their main weekly shop. A 2025 Mintel report found Lidl had the fifth largest share of UK respondents using them for their main grocery shopping.[304]

5.24 Aldi submitted that its limited range was recognised by consumers and shaped purchasing behaviour – specifically that analysis showed only [0-5]% of shoppers were willing to only shop at a LAD, that the majority of customers shop around as they cannot complete a weekly shop at Aldi or LADs more generally and that [70-80%] spent by Aldi shoppers was spent with other grocery retailers (a figure that has remained largely consistent over the last four years).[305]

5.25 However, the CMA provisionally considers that this analysis does not show that Aldi offers a significantly more limited range than an LGR. This is because:

(a) Evidence shows that consumers tend to use a range of Grocery Retailers to meet their needs even for main shops, such that only a relatively small proportion of customers being willing to only use a LAD is part of a wider trend across Grocery Retailers. For example, the Sainsbury's/Asda merger final report outlines that customers used an average of 1.5 different brands for main shops (over a 12-week period) at the time of the investigation.[306]

(b) In a context where customers tend to use multiple Grocery Retailers (for example see paragraph 4.38), the analysis submitted by Aldi shows that for the 12-week period ending 19 April 2026, [10-20]% of Aldi shoppers' spend was in Aldi which is the largest share of any Grocery Retailer (Tesco was next with [10-20]% share of Aldi shoppers' spend).[307] Aldi further submitted that its shoppers are more likely to shop elsewhere than shoppers at other supermarkets and told us that this is illustrated by [✂] data for this period showing that Tesco's share of its own shoppers' spend is [30-40]% meaning

302 Sainsbury's response to the CMA's ITC, page 5, paragraph 13.
303 Sainsbury's response to the CMA's information request [✂].
304 Mintel (2025), 'Supermarkets – UK – 2025', page 22. We note that the data is for the UK and Mintel does not distinguish between Lidl GB and Lidl NI and refers just to Lidl.
305 Aldi's submission to the CMA [✂].
306 Sainsbury's/Asda final report, paragraph 4.11.
307 This is followed by Sainsbury's ([✂] share of Aldi shoppers' spend), Asda ([✂]), Lidl ([✂]) and Morrisons ([✂]). Aldi submission to the CMA [✂].

it retains around [70-80]% more of its shoppers' grocery spend than Aldi.[308] However, the CMA notes that three LGRs [[✄], [✄] and [✄]] have shares of their own shoppers' spend that is lower than Aldi's.[309] Again, while this is consistent with evidence of customers using multiple retailers it is not, in and of itself, inconsistent with a conclusion that these customers are using Aldi for main shops.

Competitive constraint exerted on LGRs

5.26 The CMA provisionally considers that evidence of a material competitive constraint exerted by Aldi, Lidl GB and/or Lidl NI on the LGRs supports the conclusion that these Grocery Retailers no longer offer a 'significantly more limited range of Groceries' than the LGRs. As set out in the competitive dynamics section (see paragraphs 4.43 to 4.72 and paragraphs 5.27 to 5.35 below), the CMA provisionally finds that each of Aldi, Lidl GB and Lidl NI exerts a material competitive constraint on the LGRs, both in relation to comparable-sized stores and larger LGR stores.

5.27 This marks a clear change from the CC's findings in its 2008 Final Report (see paragraphs 4.46 and 4.47). In the CMA's 2019 Sainsbury's/Asda merger investigation, the CMA found that:

(a) Aldi and Lidl[310] had grown significantly since 2010, more than doubling their combined estimated grocery market share in Great Britain to around 13% of sales.[311]

(b) Aldi and Lidl were in the same relevant product market along with the LGRs and Iceland[312] based on evidence, including survey data, entry-exit analysis and internal documents[313] and the finding was for all large stores (greater than 1,400 sqm) and medium stores (280 to 1,400 sqm).[314]

(c) Medium-sized Aldi and Lidl stores may be a greater constraint than a medium-sized 'Big 4' store, particularly on Asda stores (the CMA noted that most Aldi and Lidl stores were medium-sized stores). [315]

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308 Aldi submission to the CMA [✄].
309 The other four LGRs [✄] have shares of their own shoppers' spend that are higher than Aldi. [✄].
310 The report did not distinguish between Lidl GB and Lidl NI.
311 Sainsbury's/Asda final report, paragraph 4.8.
312 Sainsbury's/Asda final report, paragraphs 7.38 and 7.67, albeit the CMA stated that Iceland imposed a constraint on Sainsbury's and Asda to a 'much lesser extent'.
313 Sainsbury's/Asda final report, paragraph 7.50
314 Sainsbury's/Asda final report, paragraph 7.7.
315 Sainsbury's/Asda final report, paragraphs 7.49, and Figures 8.4 and 8.5. As can be seen in the figures, the constraint from Aldi stores was greater than from Lidl.

5.28 Thise findings were made notwithstanding Aldi's and Lidl's distinct business models.[316]

5.29 Since 2019, the evidence shows that these trends have continued, consistent with the CMA's view that each of Aldi, Lidl GB and Lidl NI continues to exert a material competitive constraint on LGRs:

Aldi

5.30 Aldi's grocery market share in Great Britain since the CMA's 2019 merger investigation has grown from 8.5% in 2020[317] to 10.8% in 2026,[318] and it has grown its geographic presence from around 750 stores in 2018[319] to 1,085 stores in 2026 (see Table 4.4). Aldi is now the fourth largest Grocery Retailer, with a larger market share than four LGRs: Morrisons, Co-op, Waitrose and M&S (in size order) (paragraph 4.52).

5.31 Further, the competitive constraint from Aldi is reflected in:

(a) Aldi's submission that the growth of Aldi and LADs more generally has helped to intensify competition in the UK grocery sector, increasing choice and driving competitive pricing.[320]

(b) the views of LGRs (and other stakeholders), including almost all LGRs who ranked Aldi as a strong or very strong competitor, with all of those considering Aldi to be at least as strong as or a stronger competitor than [✂], [✂], [✂], [✂] and [✂] (paragraphs 4.70(a) and 4.70(d));[321]

(c) data supplied by Iceland which showed that over a 12-month period customers had consistently switched to Aldi from Asda, Morrisons and Co-op (see paragraph 4.72(a)); and

(d) Aldi playing an important role in the pricing frameworks of the LGRs, including through ongoing benchmarking and targeted price matching (paragraphs 4.80 to 4.86).

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[316] The CMA noted differences including Aldi and Lidl being cheaper, stocking fewer products lines and fewer branded products. Sainsbury's/Asda final report, paragraph 17 and 4.43.

[317] CMA analysis of Grocery Market Share - Worldpanel. Data for 12 weeks ending 2 February 2020. The market shares presented in the CMA's 2019 investigation into the Sainsbury's/Asda merger were UK-wide market shares. Given Aldi only operates in GB and for consistency the CMA has considered market shares for both 2020 and 2026 based on data from Worldpanel. Aldi's UK-wide market share as reported in the merger investigation was 7%. Based on the 52-week period to 12 August 2018. Sainsbury's/Asda final report, paragraph 4.27.

[318] Grocery Market Share - Worldpanel. Data for 12 weeks ending 17 May 2026. See footnote 181 for more details.

[319] Lidl opens its 700th store in the UK, accessed 8 June 2026.

[320] Aldi's submission to the CMA [✂].

[321] We note that multiple LGRs [✂] stated that there is limited if any competitor differentiation based on the Grocery Store size. Responses to the CMA's information requests: [✂] response to the CMA's information request [✂]; [✂] response to the CMA's information request [✂]; [✂] response to the CMA's information [✂]; [✂] response to the CMA's information request [✂]; [✂] response to the CMA's information request [✂]; [✂] response to the CMA's information request [✂].

Lidl GB

5.32 Lidl GB's grocery market share in Great Britain since the CMA's 2019 merger investigation has grown from 5.4% in 2020[322] to 8.6% in 2026,[323] whilst it has grown its geographic presence from 736 stores in 2018[324] to 1,016 stores in 2026 (see Table 4.4). Lidl GB is now the fifth largest Grocery Retailer, with a larger market share than four LGRs: Morrisons, Co-op, Waitrose and M&S (in size order) (see paragraph 4.52).

5.33 Further, the competitive constraint from Lidl GB is reflected in:

(a) Lidl GB's statement that it seeks to win customers from across the grocery sector, including LGRs.[325]

(b) the views of LGRs (and other stakeholders), including almost all LGRs who ranked Lidl GB as a moderate, strong or very strong competitor, with all of those LGRs considering Lidl GB to be at least as strong as or a stronger competitor than [✂], [✂], [✂] and [✂] (paragraphs 4.70(b) and 4.70(d));[326]

(c) data supplied by Iceland which showed that over a 12-month period customers had consistently switched to Lidl GB from Asda, Tesco and Morrisons (see paragraph 4.72(a)); and

(d) Lidl GB playing a role in the pricing frameworks of the LGRs, including through ongoing benchmarking and targeted price matching (paragraphs 4.80 to 4.86).

Lidl NI

5.34 Lidl NI's consistently strong revenue growth[327] has resulted in an estimated grocery market share in Northern Ireland of 9.7% (paragraph 4.54),[328] whilst it has grown its geographic presence from 38 stores in 2019[329] to 44 stores in 2026 (see Table 4.4).

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[322] CMA analysis of Grocery Market Share - Worldpanel. Data for 12 weeks ending 2 February 2020. The market shares presented in the CMA's 2019 investigation into the Sainsbury's/Asda merger were UK-wide market shares. Given Lidl GB only operates in GB and for consistency the CMA has considered market shares for both 2020 and 2026 based on data from Worldpanel by Numerator. Lidl GB and Lidl NI's combined UK-wide market share as reported in the merger investigation was 5%. Based on the 52-week period to 12 August 2018. Sainsbury's/Asda final report, paragraph 4.27.
[323] Grocery Market Share - Worldpanel. Data for 12 weeks ending 17 May 2026. See footnote 181 for more details.
[324] Lidl GB's submission to the CMA [✂].
[325] Note of meeting with Lidl GB [✂].
[326] We note that multiple LGRs [✂] stated that there is limited if any competitor differentiation based on the Grocery Store size. Responses to the CMA's information requests: [✂] response to the CMA's information [✂]; [✂] response to the CMA's information request [✂]; [✂] response to the CMA's information request [✂]; [✂] response to the CMA's information request [✂]; [✂] response to the CMA's information [✂]; [✂] response to the CMA's information request [✂].
[327] New report reveals Lidl Northern Ireland boosted local economy by a record £360m in 2023 as retailer marks 25 years in region, accessed 5 June 2026.
[328] Lidl NI's response to CMA's information request [✂].
[329] Lidl opens its 200th store on the island of Ireland, accessed 8 June 2026.

5.35 Further, the competitive constraint from Lidl NI is reflected in the views of three LGRs who ranked Lidl NI as a moderate or very strong competitor (paragraphs 4.70(c)).[330]

Provisional conclusions

5.36 The evidence set out above shows that the ranges offered by each of Aldi, Lidl GB and Lidl NI are not significantly more limited than those offered by LGRs. In particular, our provisional findings are that:

(a) Aldi, Lidl GB and Lidl NI have each significantly expanded the range of products they each offer since the CC report. This has led to a narrowing of the gaps in SKU count between each of Aldi, Lidl GB and Lidl NI and LGRs.

(b) While each of Aldi, Lidl GB and Lidl NI focuses on own-brand products, the CMA considers that the absence of material product categories or product types from a retailer's range is of much greater significance than the absence or reduced presence of products from particular supplier types (such as branded suppliers) when assessing whether a retailer sells a significantly more limited range of Groceries than an LGR. As recognised by the CC, it is possible to offer a product range broadly comparable to an LGR with a substantially lower SKU count where there is greater reliance on own-brand products (see for examples paragraphs 2.3 and 2.42).

(c) The CMA identified no material gaps in each of Aldi's, Lidl GB's and Lidl NI's current ranges, at the level of the broad product categories of Groceries as defined in the Order or the product categories set out in the CC's Final Report, even though each retailer does not have the depth of offering that some LGRs have.

(d) The CMA accepts that the business models adopted by each of Aldi, Lidl GB and Lidl NI differ, to some extent, from those of the existing LGRs. However, for the reasons set out at paragraph 5.16 above, the CMA considers that a distinct business model can be entirely consistent with not being a LAD under the Order. The CMA also notes (see paragraphs 5.63 to 5.66 below) that existing LGRs themselves exhibit material variation in business models and strategies.

(e) Aldi's own marketing materials, and available evidence on consumer behaviour, indicate that Aldi is a suitable destination for consumers' main weekly shop. Lidl GB's own marketing materials, and available evidence on consumer behaviour, indicate that Lidl GB has all consumers need for their main weekly shop. Lidl NI's own statements, and marketing materials,

330 We note that we received responses from three LGRs [✂] on competitor offering in NI. [✂] and [✂] both ranked Lidl GB and Lidl NI as the same entity.

indicate that Lidl NI is a suitable destination for consumers' main weekly shop.

(f) With regards to the competitive constraint exerted on LGRs:

(i) Aldi exerts a material competitive constraint on the LGRs, despite differences in their strategies, as found by previous investigations and shown by evidence such as switching data, LGRs' views, price benchmarking and price matching schemes. This is also reflected in the substantial growth in Aldi's market share in Great Britain from 8.5% in 2020 to 10.8% in 2026.

(ii) Lidl GB exerts a material competitive constraint on the LGRs, despite differences in their strategies, as found by previous investigations and shown by evidence such as switching data, LGRs' views, price benchmarking and targeted price matching. This is also reflected in the substantial growth in Lidl GB's market share in Great Britain from 5.4% in 2020 to 8.6% in 2026.[331]

(iii) Lidl NI exerts a material competitive constraint on the LGRs, despite differences in their strategies, as found by previous investigations and shown by the views of LGRs. This is also reflected in Lidl NI's consistently strong revenue growth,[332] which has resulted in an estimated market share in Northern Ireland of 9.7%.[333]

5.37 For these reasons and based on the evidence set out above, the CMA provisionally considers that:

(a) it is no longer the case that Aldi sells a significantly more limited range of groceries than an LGR.

(b) it is no longer the case that Lidl GB sells a significantly more limited range of groceries than an LGR.

(c) it is no longer the case that Lidl NI sells a significantly more limited range of groceries than an LGR.

[331] Grocery Market Share - Worldpanel.
[332] New report reveals Lidl Northern Ireland boosted local economy by a record £360m in 2023 as retailer marks 25 years in region, accessed 5 June 2026.
[333] Lidl NI's response to CMA's information request [✂].

Whether each of Aldi, Lidl GB and Lidl NI sells at a low price: provisional assessment

5.38 In each price comparison in which Aldi, Lidl GB and Lidl NI were included[334] (see paragraphs 4.76 to 4.86), each of those retailers was found to be cheaper than any LGR. Although the methodologies used differed and resulted in varying estimates of the price differential, all comparisons identified a price gap of at least [5-10]% between Aldi[335] and the cheapest LGR, at least [5-10]% between Lidl GB and the cheapest LGR, and at least [5-10]% between Lidl NI and the cheapest LGR.

5.39 Based on the evidence above, the CMA provisionally considers that:

(a) Aldi sells at a low price.

(b) Lidl GB sells at a low price.

(c) Lidl NI sells at a low price.

Provisional conclusions on whether each of Aldi, Lidl GB and Lidl NI is a LAD

5.40 Based on the evidence above, and noting that none of Aldi, Lidl GB and Lidl NI meets both of the criteria that are set out in the Order's definition of a LAD, the CMA provisionally considers that:

(a) Aldi is no longer a LAD, as set out in the Order.

(b) Lidl GB is no longer a LAD, as set out in the Order.

(c) Lidl NI is no longer a LAD, as set out in the Order.

5.41 The CMA will, therefore, go on to consider provisionally whether each of Aldi, Lidl GB and Lidl NI meets the criteria for designation as an LGR.

Whether each of Aldi, Lidl GB and Lidl NI meets the criteria for designation as an LGR: provisional assessment

LGR designation criteria

5.42 As noted at paragraph 2.16 above, the Order provides for the designation of additional Grocery Retailers as LGRs where they:

[334] Namely Which? analysis, benchmarking carried out by Aldi, Lidl GB and Lidl NI, and benchmarking carried out by the LGRs.

[335] With respect to Aldi, while four LGRs operate price matching schemes to Aldi (see paragraph 4.86), suggesting that for some products prices may align, these schemes cover a relatively narrow range of products. Further, these products are included in the benchmarking above and so the price differentials persist notwithstanding the existence of these price matching schemes.

(a) operate Larger Grocery Stores throughout either Great Britain or Northern Ireland or both or in a considerable part or parts of the UK;

(b) carry a full range of Groceries for sale at the retail level; and

(c) have an integrated grocery wholesaling function that purchases directly from grocery suppliers.

5.43 We set out below our provisional assessment of whether these designation criteria are met in relation to each of Aldi, Lidl GB and Lidl NI.

Whether each of Aldi, Lidl GB and Lidl NI operates Larger Grocery Stores throughout either Great Britain or Northern Ireland or both or in a considerable part or parts of the United Kingdom: provisional assessment

5.44 As set out in the framework for designation section above (see paragraphs 2.31 to 2.36), to be designated as an LGR, a Grocery Retailer must operate Larger Grocery Stores throughout either Great Britain or Northern Ireland or both, or in a considerable part or parts of the United Kingdom. As noted at paragraph 2.21, the Order excludes stores operated by LADs from the definition of Grocery Store.

5.45 At paragraph 5.40, we provisionally considered that each of Aldi, Lidl GB and Lidl NI is no longer a LAD, as set out in the Order. Therefore, we provisionally consider each of Aldi's, Lidl GB's and Lidl NI's stores to be Grocery Stores for the purpose of assessing whether they meet this designation criterion.

5.46 In our provisional assessment of whether each of Aldi, Lidl GB and Lidl NI meets this designation criterion, we have considered:

(a) Whether they each operate Larger Grocery Stores – that is whether they operate Grocery Stores with Net Sales Areas of more than 1,000 sqm; and

(b) Whether they each operate those Larger Grocery Stores throughout Great Britain or Northern Ireland or both, or in a considerable part or parts of the United Kingdom.

5.47 As evidenced in Section 4 (see Table 4.4):

(a) Aldi operates more than 1,000 stores across Great Britain. The majority of its stores (72%) possess a Net Sales Area greater than 1,000 sqm, meeting the definition of a Larger Grocery Store. Whilst Aldi does not operate stores in Northern Ireland, it maintains a significant presence throughout England, Scotland and Wales.

(b) Lidl GB operates more than 1,000 stores across Great Britain. The majority of its stores (87%) possess a Net Sales Area greater than 1,000 sqm, meeting the definition of a Larger Grocery Store. Whilst Lidl GB does not operate stores in Northern Ireland, it maintains a significant presence throughout England, Scotland and Wales.

(c) Lidl NI operates more than 40 stores across Northern Ireland. The majority of its stores (80%) possess a Net Sales Area greater than 1,000 sqm, meeting the definition of a Larger Grocery Store. Whilst Lidl NI does not operate stores in England, Scotland or Wales, it maintains a significant presence throughout Northern Ireland.

5.48 We note that this represents an increase in both the number and size of stores operated by each of Aldi and Lidl in the UK since the 2008 Final Report, where the CC noted that Aldi operated 360 stores and Lidl (collectively) operated 465 stores in the UK,[336] with the average size of a LAD store at that time being 800 sqm.[337]

Provisional conclusions

5.49 Based on the evidence above, the CMA provisionally considers that:

(a) Aldi operates Larger Grocery Stores, and that it operates its Larger Grocery Stores throughout Great Britain. The CMA therefore provisionally concludes that Aldi meets this designation criterion.

(b) Lidl GB operates Larger Grocery Stores, and that it operates its Larger Grocery Stores throughout Great Britain. The CMA therefore provisionally concludes that Lidl GB meets this designation criterion.

(c) Lidl NI operates Larger Grocery Stores, and that it operates its Larger Grocery Stores throughout Northern Ireland. The CMA therefore provisionally concludes that Lidl NI meets this designation criterion.

Whether each of Aldi, Lidl GB and Lidl NI carries a full range of Groceries for sale at the retail level: provisional assessment

5.50 As set out in the framework for designation section above (see paragraphs 2.37 to 2.44), to be designated as an LGR, a Grocery Retailer must carry a full range of Groceries for sale at the retail level.

5.51 In accordance with the framework for designation, the CMA has had regard primarily to the category coverage and overall composition of each of Aldi's, Lidl GB's and Lidl NI's ranges when assessing this criterion. This has included assessing whether each Grocery Retailer carries products in:

(a) All of the categories included in the Order's definition of Groceries; and

[336] Final Report, paragraph 3.18, footnote 1 (Verdict, UK Grocery Retailers, 2008).
[337] Final Report, Figure 3.2.

(b) In nine categories of Groceries, which are based on categories included in Appendix 3.1 of the Final Report, where the CC set out summary profiles of UK grocery retailers and their estimated 'sales mix'.

5.52 The CMA has also considered the extent of each of Aldi, Lidl GB and Lidl NI's coverage in these categories. To do this, the CMA has considered the extent to which a Grocery Retailer's range comprises own-brand products and if it does how its range compares to those of LGRs for own-brand Groceries; and whether there are any material gaps in ranges. The CMA has also had regard to the business model of each Grocery Retailer.

5.53 Further, the CMA has considered evidence on whether consumers are able to complete a main weekly shop at each of Aldi, Lidl GB and Lidl NI. As noted at paragraph 2.43 above, given that consumers can complete a main weekly shop at an LGR, evidence that they can also do so at Aldi, Lidl GB and Lidl NI indicates that those Grocery Retailers 'carry a full range' like the LGRs. The CMA has therefore considered evidence from the marketing material of Aldi, Lidl GB and Lidl NI, as well as analysis of consumer shopping behaviour submitted to the CMA by Grocery Retailers.

5.54 The CMA has also considered the competitive constraint that each of Aldi, Lidl GB and Lidl NI places on the LGRs. As noted at paragraph 2.44 above, if a Grocery Retailer imposes a material competitive constraint on LGRs, that indicates it is also likely to 'carry a full range of Groceries' under the Order.

Categories included in the Order's definition of Groceries

5.55 As set out at paragraph 4.16 above, while each uses different terms for their exact product categories, each of Aldi, Lidl GB and Lidl NI offers products in all six categories in the Order's definition of Groceries: food, pet food, drinks, cleaning products, toiletries and household goods.

Categories included in Appendix 3.1 of the Final Report

5.56 As set out at paragraph 4.17 above, each of Aldi, Lidl GB and Lidl NI sells products in each of the product categories included in Appendix 3.1 of the Final Report, where the CC set out summary profiles of UK grocery retailers and their estimated 'sales mix' by category.[338]

[338] The categories are Ambient Groceries, Grocery non-food (including household goods, cleaning products, toiletries and pet food), Chilled, Frozen, Meat/Fish, Produce, Bakery, Delicatessen and Beverages (including beer/wines/spirits). Some retailers added an additional category (ie Fresh, Miscellaneous and Other) though since not all retailers used these categories, we exclude them from our comparisons.

Category coverage and material gaps in ranges

5.57 Aldi, Lidl GB and Lidl NI each made submissions on how their propositions differ from those of LGRs, particularly in relation to product range (see paragraph 4.36 above).

5.58 The CMA has considered each of Aldi, Lidl GB and Lidl NI's ranges focusing on their category coverage and overall composition of their ranges, rather than treating overall SKU count as determinative.

5.59 The CMA also notes that Aldi, Lidl GB and Lidl NI's Groceries ranges are each focused primarily on own-brand products (see further paragraphs 5.9 to 5.11 above). However, in line with the CC's assessment in the Final Report in relation to M&S, a retailer can offer a product range broadly comparable to that of an LGR even where its range consists of own-brand products (see paragraphs 2.3 and 2.42). In the CMA's view, therefore, when assessing whether a retailer carries a full range of Groceries, the absence of material product categories or product types from a retailer's range is of greater significance than the absence or reduced presence in a retailer's range of products from particular supplier types (such as branded suppliers).

5.60 Aldi, Lidl GB and Lidl NI each explained that, while their ranges differ from LGRs, they are designed to meet customers' core grocery needs.

(a) Aldi explained that it offers a basic range of products across most categories but does not provide the same depth or variety of range as LGRs, including in areas such as free-from, organic, international cuisines, exotic fruits and vegetables, and health and beauty products.[339]

(b) Lidl GB explained that its range is designed to meet the majority of customers' grocery needs, while recognising that it does not cover certain areas, such as free-from or world foods.[340]

(c) Lidl NI explained that its range is intended to cover all the needs for a family's weekly shop, but that it removes the choice that a customer can get from LGRs;[341] for example, Lidl NI cited gaps in its organic and gluten free ranges.[342]

5.61 Notwithstanding the submissions of Aldi, Lidl GB and Lidl NI regarding gaps in their respective ranges (see paragraph 5.13), the CMA has not identified any material gaps in Aldi's, Lidl GB's or Lidl NI's ranges at the level of the broad product categories of Groceries as defined in the Order or the product categories

[339] Aldi's submission to the CMA [✂].
[340] Note of meeting with Lidl GB [✂].
[341] Note of meeting with Lidl NI [✂].
[342] Note of meeting with Lidl NI [✂].

set out in the CC's Final Report (see paragraph 5.12). The differences identified by the retailers mainly relate to the depth of choice within particular categories, rather than the absence of core grocery categories (see paragraph 5.12 above).

5.62 This evidence is consistent with the evidence on suitability for completion of a main weekly shop and competitive constraints exerted on the LGRs. Taken together, the evidence indicates that each retailer's grocery offer is sufficient to support a main weekly shop (see paragraphs 5.67 to 5.70 below), and that the composition of their ranges is sufficient for them to exert a material competitive constraint on the LGRs (see paragraphs 5.71 and 5.72 below).

Business models

5.63 Aldi, Lidl GB and Lidl NI each provided submissions to the CMA regarding their business model, as set out at paragraph 4.36 above.

5.64 As set out at paragraph 5.17 above, the CMA recognises that these retailers operate a business model that continues to differ, to some extent, from those of the existing LGRs. However, the CMA also observes that the existing LGRs themselves exhibit material variation in their business models and strategies, including in particular:

(a) Product range – as set out in Table 4.1, in relevant stores the difference between the LGR with the highest average SKU count and the LGR with the lowest SKU count exceeds [✂] SKUs; and

(b) Balance between branded and own-brand products – as shown in Table 4.2, M&S places substantially greater emphasis on own-brand products which account for over 90% of its average SKU count in relevant stores, whereas for other LGRs this proportion is in the range of [20-40]%.

5.65 Taken together, this evidence shows that there is no uniform LGR business model. Rather, the CMA finds that the business models and strategies adopted by the LGRs encompass a spectrum of different approaches which show that having a distinctive business model is entirely consistent with carrying a full range of groceries.

5.66 Further, the CMA has taken account under this heading of the signal which is conveyed by store fascia to customers regarding the range and type of products they can expect to be available at Aldi, Lidl GB and Lidl NI as considered in further detail at paragraphs 5.15 to 5.18 above.[343]

[343] The CMA also notes in this regard the evidence regarding customer perceptions of range at paragraph 5.14 above.

Suitability for completion of a main weekly shop

5.67 At the time of the Sainsbury's/Asda merger investigation, the weekly shop was the most common shopping mission.[344] This is consistent with a 2025 Mintel report explaining that 49% of UK grocery shoppers do a main shop and combine it with frequent top-ups and 43% do one main shop.[345] In this context, the CMA considers that evidence of consumers completing a main weekly shop at a Grocery Retailer indicates that the retailer carries a full range of groceries for the purposes of this assessment. We have therefore considered Aldi, Lidl GB and Lidl NI's own statements and marketing materials, together with available evidence on consumer shopping behaviour.

5.68 The CMA finds that Aldi, Lidl GB and Lidl NI's websites each present their ranges as suitable for a main weekly shop. Aldi states that it provides everything shoppers need for their big weekly shop (see paragraph 4.40(a)); Lidl GB states that shoppers will find all they need for their weekly shop in its stores (see paragraph 4.40(b)); and Lidl NI refers to covering all the needs for a family's weekly shop (see paragraph 4.40(c)).

5.69 The CMA finds that available evidence on consumer spending supports this position for Aldi and Lidl GB (see paragraph 4.37 to 4.42 above).[346] Data submitted by one LGR [[✂]] shows that Aldi ranked third and Lidl GB ranked fifth among rival grocery retailers for consumer main shops.[347] Sainsbury's analysis similarly ranked Aldi third and Lidl GB fifth for main shop missions among non-Sainsbury's shoppers.[348] Similarly, a 2025 Mintel report found Aldi and Lidl had the fourth and fifth largest shares of respondents using them for their main grocery shopping.[349]

5.70 The CMA also considered Aldi's submission that consumers recognise its limited range and that this affects purchasing behaviour (see paragraph 5.24). For the same reasons as set out in paragraph 5.25, the CMA considers that this evidence does not show that consumers regard Aldi as unsuitable for a main weekly shop.

Competitive constraint exerted on LGRs

5.71 The CMA finds that evidence shows that each of Aldi, Lidl GB and Lidl NI exerts a material competitive constraint on the LGRs (see paragraphs 4.43 to 4.72 above).

[344] Sainsbury's/Asda final report, paragraph 4.12.
[345] Mintel (2025), 'Supermarkets – UK – 2025', page 21.
[346] This was also supported by the views of most third parties, including most of the LGRs and the ACS. One third party, a consumer that responded to our ITC, noted limitations of Lidl's range. See paragraphs 4.33 to 4.35.
[347] [✂] response to the CMA's information request [✂].
[348] Sainsbury's response to the CMA's ITC, page 5, paragraph 13.
[349] Mintel (2025), 'Supermarkets – UK – 2025', page 22. We note that Mintel does not distinguish between Lidl GB and Lidl NI and refers just to Lidl.

This indicates that they each carry a full range of Groceries, allowing them to compete with the LGRs.

5.72 The CMA finds that, as set out above in paragraphs 5.26 to 5.35, in relation to the competitive constraint exerted on LGRs by each of Aldi, Lidl GB and Lidl NI:

(a) In contrast to the CC's findings in the Final Report, the CMA's 2019 investigation into the Sainsbury's/Asda merger indicates that each of Aldi and Lidl placed a material constraint on LGRs (the report did not distinguish between Lidl GB and Lidl NI), despite differences in their strategies.

(b) Since the CMA's 2019 investigation the trends identified, in particular the growth of each of Aldi, Lidl GB and Lidl NI, appear to have continued which is consistent with a continuing competitive constraint by each of Aldi, Lidl GB and Lidl NI on LGRs.

(c) This is also supported by the views of LGRs and, for Aldi and Lidl GB, switching data and pricing frameworks.

Provisional conclusions

5.73 In its provisional assessments of whether each of Aldi, Lidl GB and Lidl NI carries a full range of Groceries, the CMA considered evidence on their respective category coverage and the overall composition of each Grocery Retailer's offering, rather than their overall SKU counts. Consistent with the CC's approach in its Final Report, the CMA considers that a lower SKU count, an own-label focused model, or narrower range within product segments does not necessarily preclude a finding that the Grocery Retailer offers a 'full range of groceries', provided the core categories are represented.

5.74 In this regard, the CMA's provisional findings are that:

(a) Each of Aldi, Lidl GB and Lidl NI carries products in all of the categories included in the Order's definition of Groceries; and in all of the categories of Groceries set out at paragraph 2.41 which are based on categories included in Appendix 3.1 of the Final Report, where the CC set out summary profiles of UK grocery retailers and their estimated 'sales mix'.

(b) Each of Aldi's, Lidl GB's and Lidl NI's respective range strategies is focused primarily on own-brand products, where its SKU count is comparable to those of LGRs. Further, the CMA identified no material gaps in Aldi's, Lidl GB's or Lidl NI's ranges at the level of broad product categories or in relation to the categories included in the Order's definition of Groceries (see paragraph 5.61). This indicates that each of Aldi, Lidl GB and Lidl NI offers products in the same broad product categories as LGRs.

(c) Consistent with this, evidence from the statements and marketing material of each of Aldi, Lidl GB and Lidl NI shows that each considers its respective range sufficient to be a suitable destination for consumers' main weekly shop. For Aldi and Lidl GB this is also consistent with evidence on consumer shopping where analysis from Tesco and Sainsbury's on main shopping missions shows that both Aldi and Lidl rank higher than most LGRs.

(d) The CMA also considered evidence regarding the business models of Aldi, Lidl GB and Lidl NI and the business models of LGRs. The CMA considers that this evidence demonstrates that there is no uniform LGR business model. Rather, the business models and strategies adopted by the LGRs encompass a spectrum of different approaches. This shows that having a distinctive business model is entirely consistent with carrying a full range of groceries.

5.75 The CMA also provisionally finds that evidence shows that each of Aldi, Lidl GB and Lidl NI exerts a material competitive constraint on the LGRs, indicating that they each carry a full range of Groceries allowing them to compete with the LGRs.

(a) This was found to be the case by the CMA's 2019 investigation into the Sainsbury's/Asda merger which found that Ald and Lidl had grown since 2010, were in the same market as the LGRs and that medium-sized Aldi and Lidl stores were a potentially greater constraint than a medium-sized 'Big 4' store (the CMA noted that most Aldi and Lidl stores were medium-sized stores).

(b) Since then Aldi, Lidl GB and Lidl NI have each continued to grow. For example, Aldi's grocery market share in Great Britain grew from 8.5% in 2020 to 10.8% in 2026 and Lidl GB's grocery market share in Great Britain increased from 5.4% in 2020 to 8.6% in 2026. Lidl NI has also seen consistently strong revenue growth,[350] which has left it with an estimated grocery market share of 9.7% in Northern Ireland.[351]

(c) Wider evidence on the views of LGRs on their competitors also shows the material constraint exerted by each of Aldi, Lidl GB and Lidl NI. For Aldi and Lidl GB, the CMA has also received switching data that shows that customers switch from certain LGRs to Aldi and Lidl GB, whilst both play a role in in the pricing frameworks of the LGRs (for example through benchmarking / price matching schemes).

5.76 For these reasons and based on the evidence set out above, the CMA provisionally considers that:

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[350] New report reveals Lidl Northern Ireland boosted local economy by a record £360m in 2023 as retailer marks 25 years in region, accessed 5 June 2026.
[351] Lidl NI's response to CMA's information request [✂].

(a) Aldi carries a full range of Groceries for sale at the retail level.

(b) Lidl GB carries a full range of Groceries for sale at the retail level.

(c) Lidl NI carries a full range of Groceries for sale at the retail level.

Whether each of Aldi, Lidl GB and Lidl NI has an integrated grocery wholesaling function that purchases directly from grocery suppliers: provisional assessment

Aldi

5.77 As set out at paragraph 4.91 above, Aldi [✄] procures directly from grocery suppliers. The CMA provisionally considers that the use by Aldi of wider group purchasing capabilities (see paragraph 4.91 above) is consistent with Aldi having an integrated grocery wholesaling function that purchases directly from grocery suppliers. The CMA further provisionally considers that Aldi's procurement of [✄] products via intermediaries [✄] (see paragraph 4.92 above) does not preclude it from possessing an integrated wholesaling function that purchases directly from grocery suppliers.[352]

Lidl GB

5.78 As set out at paragraph 4.93 above, Lidl GB buys directly from grocery suppliers and does not buy any products through independent intermediaries, wholesalers or buying groups. The CMA also provisionally considers that the use by Lidl GB of wider group purchasing capabilities (see paragraph 4.93) is consistent with Lidl GB having an integrated grocery wholesaling function that purchases directly from grocery suppliers.

Lidl NI

5.79 As set out at paragraph 4.94 above, Lidl NI purchases products directly from grocery suppliers and does not buy any products through an independent intermediary, wholesaler or buying group. The CMA also provisionally considers that the use by Lidl NI of wider group purchasing capabilities (see paragraph 4.94 above) is consistent with Lidl NI having an integrated grocery wholesaling function that purchases directly from grocery suppliers.

[352] The CMA notes that in the Final Report, paragraphs 3.30-3.34, the CC explained that at that time, grocery retailers purchased relatively little of their fresh produce directly from UK farmers. Instead, most fresh produce was supplied to grocery retailers via intermediaries. It noted that primary producers such as farmers may be members of, or shareholders in, intermediary businesses that market their produce to grocery retailers. This indirect trading relationship for a category of groceries did not prevent the CC from finding that the LGR had integrated wholesaling functions.

Provisional conclusions

5.80 The CMA therefore provisionally concludes that:

(a) Aldi has an integrated grocery wholesaling function that purchases directly from grocery suppliers.

(b) Lidl GB has an integrated grocery wholesaling function that purchases directly from grocery suppliers.

(c) Lidl NI has an integrated grocery wholesaling function that purchases directly from grocery suppliers.

Provisional conclusions on whether each of Aldi, Lidl GB and Lidl NI meets the criteria for designation as an LGR

5.81 Based on the evidence above, the CMA provisionally concludes that:

(a) Aldi meets all of the criteria for designation as an LGR.

(b) Lidl GB meets all of the criteria for designation as an LGR.

(c) Lidl NI meets all of the criteria for designation as an LGR.

6. Provisional decisions on designation

6.1 As noted at paragraph 2.18 the CMA has provisionally considered whether each of Aldi, Lidl GB and Lidl NI meets the definition of a LAD in the Order, and if not, whether each meets the criteria for designation set out in the Order. The CMA's provisional decisions in relation to each of Aldi, Lidl GB and Lidl NI are set out below.

Aldi

6.2 The CMA has provisionally found that Aldi is no longer a LAD within the meaning of the Order (see paragraph 5.40(a)).

6.3 The CMA has provisionally found that whilst Aldi continues to sell groceries at a low price (see paragraphs 5.38 and 5.39(a)), it no longer carries a significantly more limited range of Groceries than an LGR (see paragraphs 5.7(a), 5.8(a), 5.9(a), 5.10 to 5.11, 5.12(a), 5.13 to 5.14(a), 5.17 to 5.18, 5.23(a), 5.24 to 5.31, 5.36 and 5.37(a)).

6.4 The CMA has also provisionally found that Aldi satisfies the criteria for designation set out in Article 3(4) of the Order:

(a) Aldi operates Larger Grocery Stores throughout Great Britain (see paragraphs 5.47(a) and 5.49(a));

(b) Aldi carries a full range of Groceries for sale at the retail level (see paragraphs 5.55 to 5.56, 5.59, 5.60(a), 5.61 to 5.66, and 5.68 to 5.76(a); and

(c) Aldi has an integrated grocery wholesaling function that purchases directly from grocery suppliers (see paragraphs 5.77 and 5.80(a)).

6.5 Accordingly, the CMA's provisional decision under Article 3(3) of the Order is that Aldi is to be designated as an LGR under the Order (see paragraph 5.81(a)).

Lidl GB

6.6 The CMA has provisionally found that Lidl GB is no longer a LAD within the meaning of the Order (see paragraph 5.40(b)).

6.7 The CMA has provisionally found that whilst Lidl GB continues to sell groceries at a low price (see paragraphs 5.38 and 5.39(b)), it no longer carries a significantly more limited range of Groceries than an LGR (see paragraphs 5.7(b), 5.8(b)(i), 5.9(b), 5.10 to 5.11, 5.12(b), 5.13, 5.14(b), 5.17 to 5.18, 5.23(b), 5.26 to 5.29, 5.32 to 5.33, 5.36 and 5.37(b)).

6.8 The CMA has also provisionally found that Lidl GB satisfies the criteria for designation set out in Article 3(4) of the Order:

(a) Lidl GB operates Larger Grocery Stores throughout Great Britain (see paragraphs 5.47(b) and 5.49(b));

(b) Lidl GB carries a full range of Groceries for sale at the retail level (see paragraphs 5.55 to 5.56, 5.59, 5.60(b); 5.61 to 5.66, 5.68 to 5.69, 5.71 to 5.75 and 5.76(b)); and

(c) Lidl GB has an integrated grocery wholesaling function that purchases directly from grocery suppliers (see paragraphs 5.78 and 5.80(b)).

6.9 Accordingly, the CMA's provisional decision under Article 3(3) of the Order is that Lidl GB is to be designated as an LGR under the Order (see paragraph 5.81(b)).

Lidl NI

6.10 The CMA has provisionally found that Lidl NI is no longer a LAD within the meaning of the Order (see paragraph 5.40(c)).

6.11 The CMA has provisionally found that whilst Lidl NI continues to sell groceries at a low price (see paragraphs 5.38 and 5.39(c)), it no longer carries a significantly more limited range of Groceries than an LGR (see paragraphs 5.7(c), 5.8(b)(ii), 5.9(c), 5.10 to 5.11, 5.12(c), 5.13, 5.14(c), 5.17 to 5.18, 5.23(c), 5.26 to 5.29, 5.34 to 5.35, 5.36 and 5.37(c)).

6.12 The CMA has also provisionally found that Lidl NI satisfies the criteria for designation set out in Article 3(4) of the Order:

(a) Lidl NI operates Larger Grocery Stores throughout Northern Ireland (see paragraphs 5.47(c) and 5.49(c));

(b) Lidl NI carries a full range of Groceries for sale at the retail level (see paragraphs 5.55 to 5.56, 5.59, 5.60(c), 5.61 to 5.66, 5.68 to 5.69, 5.73 to 5.75 and 5.76(c)); and

(c) Lidl NI has an integrated grocery wholesaling function that purchases directly from grocery suppliers (see paragraphs 5.79 and 5.80(c)).

6.13 Accordingly, the CMA's provisional decision under Article 3(3) of the Order is that Lidl NI is to be designated as an LGR under the Order (see paragraph 5.81(c)).

Juliette Enser on behalf of the Case and Policy Committee

7 August 2026