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

Provisional decisions – Appendix A

07 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 Some numbers have been replaced by a range.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. The evidence gathered

Number of SKUs

Table 1.1: Average number of Grocery SKUs in stores with Net Sales Area between 1,000 to 2,000 sqm, and greater than 2,000 sqm

Grocery retailer	Average number of Grocery SKUs in stores with NSA between 1,000 to 2,000 sqm	Average number of Grocery SKUs in stores with NSA greater than 2,000 sqm
Asda	[18,000-20,000]	[25,000-30,000]
Co-op	[9,000-10,000]	not applicable
M&S	[6,000-7,000]	[6,000-7,000]
Morrisons	[12,000-14,000]	[18,000-20,000]
Sainsbury's	[18,000-20,000]	[30,000-35,000]
Tesco	[9,000-10,000]	[16,000-18,000]
Waitrose	[18,000-20,000]	[20,000-25,000]
Aldi	[4,000-5,000]	not applicable
Lidl GB	[4.000-5,000]	not applicable
Lidl NI	[4,000-5,000]	not applicable

Source: Asda's response to the CMA's s.174 Notice [✂]; Co-op's response to the CMA's s.174 Notice [✂]; M&S' response to the CMA's s.174 Notice [✂]; Morrisons' response to the CMA's s.174 Notice [✂]; Sainsbury's response to the CMA's s.174 Notice [✂]; Tesco's response to the CMA's s.174 Notice [✂]; Waitrose'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 NI's response to the CMA's s.174 Notice [✂].
Notes: Aldi, Lidl GB, Lidl NI and the LGRs provided, for the period 1 March 2025 to 28 February 2026, the average number of stock keeping units (SKUs), for Groceries.

i) Asda's figures were [✂]. Asda were unable to split out the SKUs which relate to houseplants and flowers, and which would not fall within the definition of 'Groceries'. Therefore, the above figures are consequently inflated as a result of this inclusion.

ii) Co-op's total SKU count number was noted as circa [9,000-10,000] and excluded items that were On and Off shelf promotions, as they were assumed to be duplicates of products included in Co-op's fixture ranged products, so already counted. Co-op defined 'On shelf promotion' as a product ranged all year round in the body of the store and periodically duplicated on a gondola end when on promotion; and 'Off shelf promotion' as a product ranged all year round in the body of the store and periodically duplicated in a dump bin or stack when on promotion. Examples include price marked and promotional multi packs.

iii) Tesco's totals show the number of grocery (i.e. excluding general merchandise, clothing, homeware etc.) SKUs which recorded at least £1 of sales in a store in a given week.

iv) Waitrose's internal measurements overstate size relative to the Net Sales Area definition. In terms of impact, several stores would fall outside the above 2,000 sqm size band if assessed using the CMA's approach in the Order. This means that the reported average SKU count for stores above 2,000 sqm may be slightly understated, as it includes stores that would otherwise fall within the smaller band and thus reduce the average. Waitrose's totals include five stores located in the Channel Islands (not in the UK). Waitrose stated that given their limited number relative to the overall estate, their inclusion did not materially affect the results.

v) Aldi's 'SKUs' are counted at the case level and correspond to a single product code. Each case may contain up to four variants (flavours) of the same product, all sharing the same case code, brand, weight (with minor variance), price, and price card (Aldi considered products in the same case to be a 'line', regardless of whether there is differentiation in flavour or weight in the products). Aldi's average number of single product codes were c. [2,000-3,000], this number includes Aldi's Core Range and any products on 'trial' and those considered regionally specific, seasonal lines and Groceries included in Aldi's Special Buy range. Including flavour 'variant' level (SKUs, as defined by the CMA), this was [4,000-5,000].

vi) Lidl GB noted that the SKU count referred to Lidl GB's standard permanently listed assortment and did not include its weekly rotating promotional assortment (food promotions and non-food). The listed assortment range naturally fluctuated throughout the year but usually by no more than +/- [✂] lines on the figures provided.

vii) Lidl NI submitted that for the basis of this response the total average number of Groceries SKUs including seasonal and in/out items was calculated using the average number of In/Out items on a weekly basis throughout the period.

Figure 1.1: Average number of Grocery SKUs in stores with Net Sales Area between 1,000 to 2,000 sqm

[✂]

Source: CMA analysis of responses to the CMA's s.174 Notices: Asda's response to the CMA's s.174 Notice [✂]; Co-op's response to the CMA's s.174 Notice [✂]; M&S' response to the CMA's s.174 Notice [✂]; Morrisons' response to the CMA's s.174 Notice [✂]; Sainsbury's response to the CMA's s.174 Notice [✂]; Tesco's response to the CMA's s.174 Notice [✂]; Waitrose'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 NI's response to the CMA's s.174 Notice [✂].

Range strategies and own-branded products

Own-brand

Table 1.2: 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 NSA between 1,000 to 2,000 sqm	Average percentage of those Groceries SKUs which are 'own-brand' in stores with NSA 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: Asda's response to the CMA's s.174 Notice [✂]; Co-op's response to the CMA's s.174 Notice [✂]; M&S' response to the CMA's s.174 Notice [✂]; Morrisons' response to the CMA's s.174 Notice [✂]; Sainsbury's response to the CMA's s.174 Notice [✂]; Tesco's response to the CMA's s.174 Notice [✂]; Waitrose'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 NI's response to the CMA's s.174 Notice [✂].
Notes: Aldi, Lidl GB, Lidl NI and LGRs provided, for the period 1 March 2025 to 28 February 2026, the average number of own-brand Groceries SKUs and the average proportion of Groceries SKUs which are own-brand.

i) The CMA estimated the number of own brand Groceries SKUs by multiplying the average percentage of those Groceries SKUs which are 'own-brand' by the average number of SKUs in stores with NSA between 1,000 to 2,000 sqm.

*ii) * Asda stated that the [20-30%] is [✂] not specific for stores with NSA between 1,000 to 2,000 sqm.*

Categories

Table 1.3: Average number of SKUs by product category for stores with a Net Sales Area greater than 1,000 sqm

Product category	*Asda*	*Co-op*	*M&S*	*Morrisons*	*Sainsbury's*	*Tesco*	*Waitrose*	*Aldi*	*Lidl GB*	*Lidl NI*
Ambient Grocery	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]
Grocery Non-food	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]
Chilled	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]
Frozen	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]
Meat/Fish	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]
Produce	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]
Bakery	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]
Delicatessen	[✂]	-	[✂]	[✂]	-	[✂]	[✂]	-	-	-
Beverages	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]
Total	**[✂]**	**[✂]**	**[✂]**	**[✂]**	**[✂]**	**[✂]**	**[✂]**	**[✂]**	**[✂]**	**[✂]**

Source: Asda's response to the CMA's s.174 Notice [✂]; Co-op's response to the CMA's s.174 Notice [✂]; M&S' response to the CMA's s.174 Notice [✂]; Morrisons' response to the CMA's s.174 Notice [✂]; Sainsbury's response to the CMA's s.174 Notice [✂]; Tesco's response to the CMA's s.174 Notice [✂]; Waitrose's response to the CMA's s.174 Notice [✂]; Tesco's response to the CMA's information request [✂]; 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 [✂].

Notes: The supermarkets' methodologies for allocating products to categories differ slightly. This gives rise to the need to caveat the above comparisons. Points to highlight are as follows:

- *i) 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.*
- *ii) Some retailers added an additional category as follows: Co-op – Miscellaneous ([✂] SKUs); M&S – Other ([✂] SKUs); Morrisons – Fresh ([✂] SKUs). The SKU counts from these categories are included in each retailer's total number of SKUs however, we do not present these categories in the table since not all retailers used them. As a result, the total number of SKUs as shown in the table is larger than the sum of the SKUs in the product categories shown for Co-op, M&S and Morrisons.*
- *iii) For some retailers, the total number of SKUs summed over all product categories does not equal the total number of SKUs outlined in the 'Number of SKUs' section above. This is due to the retailers using different methodologies in response to different questions in the CMA's s.174 notices. First, in Table 1.1 the SKU counts are calculated separately for stores with Net Sales Area between 1,000 to 2,000 sqm and greater than 2,000 sqm, whereas Table 1.3 is calculated for all stores exceeding 1,000 sqm. Second, some retailers calculated average SKU counts across categories rather than stores. This means that their SKU counts in this table include all SKUs equally regardless of how many stores they are stocked in.*
- *iv) Aldi highlighted that its figures include trial, regionally specific products, seasonal lines and groceries in the Special Buy range, but Co-op allocated promotional, seasonal and project-based categories to a Miscellaneous category.*
- *v) Grocery Non-food – Waitrose [✂]. Based on Waitrose's response, we have [✂].*
- *vi) Delicatessen - Waitrose included dips, cooked meat and pate etc, as well as the Deli Service Counter in Delicatessen.*
- *vii) We note that some retailers have allocated Delicatessen SKUs to other categories. Aldi, Lidl GB and Lidl NI do not allocate any SKUs to the Delicatessen product category, however, based on more detailed categorisations submitted by Aldi, Lidl GB, and Lidl NI, the CMA considers that they allocated these SKUs to other categories; Aldi included all Delicatessen-style products in the Chilled category, Lidl GB allocated delicatessen products to Ambient Grocery and chilled delicatessen to Chilled, Lidl NI has allocated sub-categories such as Cold Meats to Chilled and Specialist Meats to Ambient Groceries. Co-op and Sainsbury's stated that they do not stock any products within the Delicatessen*

category. We expect that these LGRs have allocated Delicatessen SKUs to other product categories in a similar way to Aldi, Lidl GB and Lidl NI.

viii) Beverages - Asda included some beverages in the Ambient Grocery category and immediate consumption drinks in the Chilled category. Waitrose included chilled dairy drinks in Chilled, Food to go drinks in Beverages and hot beverages in Ambient Grocery.

Table 1.4 Percentage of SKUs by product category for stores with a Net Sales Area greater than 1,000 sqm

Product category	*Asda*	*Co-op*	*M&S*	*Morrisons*	*Sainsbury's*	*Tesco*	*Waitrose*	*Aldi*	*Lidl GB*	*Lidl NI*
Ambient Grocery	[20-30%]	[30-40%]	[10-20%]	[30-40%]	[20-30%]	[30-40%]	[30-40%]	[20-30%]	[30-40%]	[30-40%]
Grocery Non-food	[30-40%]	[20-30%]	[20-30%]	[20-30%]	[30-40%]	[20-30%]	[10-20%]	[10-20%]	[10-20%]	[10-20%]
Chilled	[10-20%]	[10-20%]	[10-20%]	[5-10%]	[10-20%]	[5-10%]	[10-20%]	[10-20%]	[20-30%]	[20-30%]
Frozen	[0-5%]	[0-5%]	[0-5%]	[5-10%]	[0-5%]	[5-10%]	[0-5%]	[10-20%]	[5-10%]	[5-10%]
Meat/Fish	[5-10%]	[0-5%]	[5-10%]	[0-5%]	[0-5%]	[0-5%]	[5-10%]	[5-10%]	[0-5%]	[0-5%]
Produce	[0-5%]	[0-5%]	[5-10%]	[0-5%]	[0-5%]	[0-5%]	[5-10%]	[5-10%]	[0-5%]	[0-5%]
Bakery	[0-5%]	[0-5%]	[0-5%]	[0-5%]	[0-5%]	[0-5%]	[0-5%]	[5-10%]	[0-5%]	[5-10%]
Delicatessen	[0-5%]	-	[0-5%]	[5-10%]	-	[0-5%]	[0-5%]	-	-	-
Beverages	[10-20%]	[10-20%]	[5-10%]	[10-20%]	[5-10%]	[10-20%]	[10-20%]	[10-20%]	[10-20%]	[5-10%]
Total	**100%**	**100%**	**100%**	**100%**	**100%**	**100%**	**100%**	**100%**	**100%**	**100%**

Source: CMA analysis of responses to the CMA's s.174 Notices: Asda's response to the CMA's s.174 Notice [✂]; Co-op's response to the CMA's s.174 Notice [✂]; M&S' response to the CMA's s.174 Notice [✂]; Morrisons' response to the CMA's s.174 Notice [✂]; Sainsbury's response to the CMA's s.174 Notice [✂]; Tesco's response to the CMA's s.174 Notice [✂]; Waitrose's response to the CMA's s.174 Notice [✂]; Tesco's response to the CMA's information request [✂]; 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 [✂].

Note: The supermarkets' methodologies for allocating products to categories differ slightly. This gives rise to the need to caveat the above comparisons, please see the notes beneath Table 1.3 for more detail.

i) Specifically, please see notes vi) and vii) in Table 1.3 for more detail on the Delicatessen category.

ii) As above, since Miscellaneous, Other and Fresh categories are excluded from the table, the percentages displayed do not sum to the total 100% for Co-op, M&S and Morrisons.

Price

Price comparisons

Price benchmarking and matching schemes

Table 1.5: Aldi, Lidl GB and Lidl NI benchmarking grocery prices against LGRs

Aldi, Lidl GB and Lidl NI's benchmarking		Asda	Co-op	M&S	Morrisons	Sainsbury's	Tesco	Waitrose	Aldi	Lidl GB	Lidl NI
[✂]	benchmarks against…	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]
[✂]		[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]
[✂]		[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]	[✂]

Source: 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 [✂].

Table 1.6: LGRs benchmarking grocery prices against Aldi, Lidl GB and Lidl NI*

LGRs' benchmarking		Aldi	Lidl GB	Lidl NI**	Other LGRs
[✂]	benchmarks against…	[✂]	[✂]	[✂]	✓
[✂]		[✂]	[✂]	[✂]	[✂]
[✂]		✓	✓	[✂]	✓
[✂]		✓	✓	[✂]	✓
[✂]		✓	✓	[✂]	✓
[✂]		✓	✓	[✂]	✓
[✂]		✓	✓	[✂]	✓

Source: Asda's response to the CMA's s.174 Notice [✂]; Co-op's response to the CMA's s.174 Notice [✂]; M&S' response to the CMA's s.174 Notice [✂]; Morrisons' response to the CMA's s.174 Notice [✂]; Sainsbury's response to the CMA's s.174 Notice [✂]; Tesco's response to the CMA's s.174 Notice [✂]; Waitrose's response to the CMA's s.174 Notice [✂].
Notes:
- *i) [✂] stated that the data collection process was split across approximately [✂] stores for each of Aldi and Lidl ([✂]);*
- *ii) [✂] noted that price benchmarking was not conducted on a UK-wide basis; comparisons were based on prices in England.*
- *iii) [✂] benchmarking exercise was undertaken against Lidl as a singular trading entity. This included obtaining price data from Lidl GB and Lidl NI stores to obtain an overall price picture for Lidl as a whole. [✂] submission to the CMA [✂];*
- *iv) [✂] stated that it did not directly benchmark product prices against Aldi and Lidl GB. 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.*
- *v) [✂] noted that price benchmarking was done for stores located in England and it also price benchmarks in Scotland due to legislative differences in the beers, wines and spirits (BWS) category;*
- *vi) [✂] stated that it considered Lidl GB and Lidl NI collectively as a key competitor and its benchmarking did not intentionally distinguish between the two entities. However, the methodology for the data collection excluded Northern Ireland for all retailers (that is not just Lidl NI). [✂] submission to the CMA [✂];*
- *vii) *The CMA has randomised the order of Table 1.6, and the accompanying notes, to protect confidentiality.*
- *viii) **Given the smaller number of retailers present in NI the CMA has redacted the full column to protect confidentiality.*

Table 1.7: LGRs price matching on basis of prices offered by Aldi, Lidl GB and Lidl NI

LGRs		Aldi	Lidl GB	Lidl NI
Asda				
Co-op		✓		
M&S				
Morrisons	price matches against…	✓	✓	not applicable
Sainsbury's		✓		
Tesco		✓		
Waitrose				not applicable

Source: Asda's response to the CMA's s.174 Notice [✂]; Co-op's response to the CMA's s.174 Notice [✂]; M&S' response to the CMA's s.174 Notice [✂]; Morrisons' response to the CMA's s.174 Notice [✂]; Sainsbury's response to the CMA's s.174 Notice [✂]; Tesco's response to the CMA's s.174 Notice [✂]; Waitrose's response to the CMA's s.174 Notice [✂].

Table 1.8: LGRs average percentage differential in price to Aldi and Lidl

Grocery retailer	Average percentage differential in price to Aldi	Average percentage differential in price to Lidl
Asda	[✂]	[✂]
Co-op	[✂]	[✂]
M&S	[✂]	[✂]
Morrisons	[✂]	[✂]
Sainsbury's	[✂]	[✂]
Tesco	[✂]	[✂]
Waitrose	[✂]	[✂]

Source: CMA analysis of responses to the CMA's s.174 Notices: Asda's response to the CMA's s.174 Notice [✂]; Co-op's response to the CMA's s.174 Notice [✂]; M&S' response to the CMA's s.174 Notice [✂]; Morrisons' response to the CMA's s.174 Notice [✂]; Sainsbury's response to the CMA's s.174 Notice [✂]; Tesco's response to the CMA's s.174 Notice [✂]; Waitrose's response to the CMA's s.174 Notice [✂].
Notes:
i) [✂]
ii) [✂]
iii) [✂]
iv) [✂]
v) [✂]
vi) [✂]
vii) [✂]
viii) [✂]
ix) [✂]

Aldi, Lidl GB and Lidl NI land agreements

1.1 The CMA asked each of Aldi, Lidl GB and Lidl NI in 2025 to provide information on whether they used restrictive covenants and exclusivity arrangements in their land agreements.

(a) Aldi carried out a 10% sampling exercise of its existing land agreements. Of those, [50-60%] contained a restriction on grocery retailing although this figure included [✂].[1]

(b) Lidl GB carried out a 10% sampling exercise of its existing land agreements. Of those, [10-20%] contained a restriction on grocery retailing.[2]

(c) Lidl NI reviewed all of its existing land agreements. Of those, [20-30%] contained a restriction on grocery retailing.[3]

[1] Aldi's response to the CMA's s.174 Notice [✂].
[2] Lidl GB's response to the CMA's s.174 Notice [✂].
[3] Lidl NI's response to the CMA's s.174 Notice [✂].