

Fair Food Price Caps – FSS Advice

Principles, criteria and potential approaches for
identifying foods for inclusion within an essential
food basket

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At Food Standards Scotland we have a unique role, working independently of Ministers and industry to provide advice which is impartial, and based on robust science and data.

Our remit covers all aspects of the food chain which can impact on public health – aiming to protect consumers from food safety risks and promote healthy eating

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Abbreviations

FSS	Food Standards Scotland
HFSS	High fat, sugar or salt
HLP	Healthy Living Programme
HRS	Healthcare Retail Standard

Introduction and policy context

The Scottish Government is considering options to improve food affordability, including the potential introduction of a price cap on a defined set of essential food items. This reflects wider concerns around the cost of living, food insecurity and the impact of rising food prices on low-income households. The aim is to keep essential foods affordable and ensure everyone can access the basic necessities for a balanced diet and meet their nutritional needs.

From a public health nutrition perspective, improving access to affordable, healthier foods is an important consideration. Poor diets remain a key public health challenge in Scotland and improving access to affordable, healthier foods for everyone is essential, particularly for lower-income groups. Households with children in the lowest income quintile would need to spend around [85% of their disposable income to afford a healthy diet in line with UK dietary guidance](#) as depicted by the Eatwell Guide. A food price cap policy therefore presents an opportunity to prioritise foods that support healthier diets and help address diet-related inequalities. The approach should be consistent with the ambitions of the Good Food Nation (Scotland) Act, supporting access to healthy, affordable food for all.

A key challenge in designing any food price cap policy is determining what constitutes an appropriate basket of "essential" food items. Decisions about the composition of such a basket could have implications for affordability, dietary health, consumer choice, retailer implementation and wider food system objectives.

This paper does not seek to determine the relative weighting of these considerations, which are ultimately policy decisions. Rather, it provides advice from a public health nutrition perspective on principles, criteria and potential approaches that could be used to identify foods for inclusion within an essential food basket. The recommendations are intended to complement wider analytical work and support further policy development.

FSS recommendations for selecting items for price capping

The following section sets out Food Standards Scotland's (FSS) recommended principles and criteria for selecting foods for inclusion within a food price cap policy. These recommendations are intended to support the development of a transparent and evidence-based approach to defining an essential food basket.

The recommendations have been developed with consideration of dietary guidance, health inequalities, purchasing behaviour, consumer acceptability, practicality and environmental sustainability. Further advice may be provided as policy development progresses and the scope and parameters of the policy become clearer following Ministerial decisions.

Excluding HFSS products and alignment with wider diet policy

The approach should align with and support wider Scottish Government policies, including those aimed at improving diet and reducing obesity – for example,

imminent restrictions on the promotion of food and drink that is high in fat, sugar or salt (HFSS).

FSS do not advise restricting the inclusion of ultra-processed foods, as the evidence base in relation to processing remains uncertain and of insufficient quality. However, any processed/ultra-processed items included within the price cap should be non-HFSS¹ – for example pasta sauces, baked beans, bread and cereals.

Alignment with dietary guidance

Alignment with dietary recommendations should be a key, underpinning principle of the policy. Included items should support the achievement of a healthy, balanced diet in line with the [Eatwell Guide](#) and [Scottish Dietary Goals](#), by:

- Prioritising a variety of vegetables and fruits, and plain starchy carbohydrates (including wholegrains)
- Including low fat, sugar and salt dairy and alternative foods
- Including healthier sources of protein such as beans and pulses, lean meat, eggs and fish
- Excluding HFSS products – key exceptions may include oil and spreads.

Informed by current purchase and/or consumption patterns

Items that are price capped should represent familiar, healthy, staple foods that households are likely to buy and use frequently, to ensure that the products appeal to consumers. Data on current purchase and/or consumption can be used to inform decisions on specific items.

Practicality

The selection of items should recognise varying levels of cooking skills, time availability and access to facilities. This may include both staple ingredients for home cooking, alongside some preprepared or convenience options that can support quick and easy meals. Items should be practical to store and prepare, with consideration given to pack size/price per kg or litre, and product shelf life to help minimise food waste.

Consideration of dietary requirements and inclusivity

The policy should aspire to be as inclusive as possible, acknowledging the variation in dietary requirements and preferences and cultural practices across Scotland's population – for example, families with children, vegetarian or vegan diets, and cultural or religious dietary practices. The list should aim to include a range of options across key food groups, including different sources of protein and dairy or alternatives, to support accessibility.

Particular consideration should be given to consumers with medically required dietary restrictions, such as food allergies, coeliac disease and lactose intolerance,

¹ HFSS – as defined by the UK Nutrient Profiling Model

as well as the nutritional needs of infants and young children. Specialist products are unlikely to be represented across all categories within a capped basket; however, potential impacts on these groups should be considered through the policy development process and relevant impact assessments.

Seasonality and supply

Definitions of items and categories should be cognisant of seasonal variation, particularly for products such as fruit and vegetables. Broader categorisation may enable flexibility to account for changes in seasonal availability. Alternatively, the policy could prioritise items available year-round however this may be subject to price volatility. Inclusion of frozen and tinned options is also recommended as a means of mitigating these challenges.

Recommended approach for selecting foods within a price cap

While the final composition of any capped basket will require further analytical work and consideration of retailer data, FSS recommends that selection of foods should follow a clear and transparent set of criteria. This would ensure that inclusion decisions are evidence-based, aligned with wider public health objectives, and capable of being applied consistently over time.

FSS recommends that foods considered for inclusion should be assessed against the following hierarchy of criteria, with alignment to dietary guidance and nutritional composition forming the primary considerations. This would help ensure that inclusion decisions are evidence-based, transparent and consistent with wider Scottish Government public health objectives:

1. Support achievement of a healthy balanced diet, in line with the Eatwell Guide and Scottish Dietary Goals.
2. Meet minimum nutritional standards, including exclusion of HFSS products except where justified by dietary guidance (for example certain oils and spreads).
3. Reflect current purchasing and consumption patterns, ensuring that included foods are commonly purchased and acceptable to consumers.
4. Be practical for households to purchase, store and prepare, taking account of differing cooking skills, equipment, time constraints and household circumstances.
5. Support inclusivity and accessibility, recognising variation in dietary preferences, cultural and religious dietary practices, and the need for vegetarian, vegan and dairy alternative options.
6. Be capable of being supplied consistently, including through frozen and tinned alternatives where appropriate to mitigate seasonal variation and reduce supply risks.

While nutritional quality should be a primary consideration, some foods may warrant inclusion because they play an important role in everyday meal preparation or achievement of dietary guidance, even where they would not ordinarily meet nutrient profiling criteria. Examples may include certain oils, spreads and dairy products. Any

such exceptions should be justified transparently and remain consistent with wider dietary recommendations.

Preferred implementation model

FSS considers a hybrid approach, combining broad food categories with minimum nutritional specifications, to be the most practical and proportionate option currently available.

This approach is preferable to specifying individual products and would provide a balance between supporting affordability objectives, protecting nutritional quality and facilitating retailer implementation.

Allowing retailers flexibility within defined categories may reduce administrative burden and improve implementation. However, excessive flexibility could result in lower-quality, less representative or less frequently purchased products being selected solely on the basis of cost. For this reason, category definitions should be accompanied by clear nutritional and product specifications where appropriate.

Nutritional safeguards

To avoid unintended reductions in nutritional quality, FSS recommends that products included within capped categories should be required to meet defined nutritional criteria where appropriate. These could draw on existing approaches already used within Scotland, including the [UK Nutrient Profiling Model](#) and [Healthcare Retail Standard](#) product criteria.

Examples of safeguards may include:

- Restricting composite products to non-HFSS options.
- Specifying wholegrain or higher-fibre options where feasible.
- Requiring unsweetened and appropriately fortified dairy alternatives.
- Applying limits for salt, sugar or saturated fat in relevant product categories.
- Maintaining minimum nutritional standards for products commonly consumed by children and households.

Evidence gaps and further work

At this stage, several issues remain subject to uncertainty and would benefit from further analysis as policy development progresses. These include:

- The impact of different basket compositions on food purchasing behaviour.
- The implications for food manufacturers, retailers and Scottish producers, including whether category definitions could unintentionally advantage or disadvantage particular sectors of Scottish food production.
- Potential effects on product range, availability and consumer choice.
- Consequences for supply chains and risks relating to shortages or substitution.

- How best to accommodate specific dietary requirements, including allergies, intolerances and infant feeding needs, within the overall framework
- Potential opportunities for manufacturers or retailers to reformulate products, alter pack sizes or substitute products in response to the cap.

Further work should also utilise retailer sales data and other analytical evidence to inform decisions on the final categories and products included within the capped basket.

FSS preferred approach

At this stage, FSS advises that food price caps should be based on broad Eatwell Guide food categories, informed by purchasing data, supported by nutritional specifications, and designed to provide flexibility for retailers while safeguarding nutritional quality.

FSS considers this hybrid approach most likely to support affordability objectives while remaining consistent with Scottish public health nutrition policy, the Eatwell Guide and Scottish Dietary Goals.

Particular consideration should be given to ensuring that the policy contributes to reducing socioeconomic inequalities in access to a healthy diet, recognising the substantially higher financial burden of achieving dietary recommendations among lower-income households.

Example food items, by Eatwell Guide category are provided in Annexe A.

Examples of existing product specifications used within existing Scottish Government policy for the retail environment to support healthy diets are provided in Annexe B.

Annexe A: Example food items, by Eatwell Guide category

The following sections provide an example list of items that could be considered within the price cap policy, based on the Eatwell guide food group categories.

Vegetables and fruit

Vegetables and fruit are an important part of a healthy and sustainable diet, accounting for around a third of the Eatwell Guide. However, [intakes remain below recommended levels in Scotland at just 2.9 portions per day among adults](#), compared to the recommended 5 portions per day.

Analysis of [data from Numerator \(formerly Kantar\)](#) showed that the most frequently consumed fruits in 2020 were: bananas, apples, berries and currants, grapes and easy peelers. The most frequently consumed vegetables in 2020 were onions, carrots, tomatoes, peppers and cucumber. These items align with a modelled example of a healthy balanced diet, [Eatwell Everyday](#) and other [published analyses of commonly consumed vegetables](#) in Scotland.

Consideration could be given to the provision of frozen and tinned options, alongside fresh, to provide convenient, longer shelf-life options. Seasonality is a key consideration as noted above, for example updating item lists over the course of a year.

It is worth noting that many fruit and vegetable options are already relatively low cost. Consideration could therefore be given to prioritising items that are typically more expensive but still widely consumed, in order to maximise impact.

Potential items based on the above could include:

- Bananas, apples, strawberries, grapes and tangerines/satsumas
- Onions, carrots, tomatoes, peppers and cucumber
- Frozen peas or mixed vegetables (no additions)
- Tinned tomatoes, tinned sweetcorn (in water), tinned fruit (in juice)

Starchy carbohydrates

The Eatwell Guide emphasises that meals should be based on starchy carbohydrates such as bread, pasta, rice and potatoes, given their role as a key source of energy and their importance within a balanced diet.

Specifically including wholegrain items would support increasing fibre intakes, which remain below recommended levels in Scotland – only 3% of adults in 2024 met fibre recommendations. Among cereal and cereal products (e.g. pasta, rice and bread), data from the [National Diet and Nutrition Survey \(2019 to 2023\)](#) indicate that these foods contribute around 45% of fibre intake in adults aged 19 to 64 years.

Potential items could include:

- Bread: wholemeal varieties would be preferable to support achievement of fibre recommendations; however, it is important to note that only non-wholemeal flour is currently in scope of mandatory folic acid fortification for the prevention of neural tube defects. 50/50 options could be included as higher fibre option, whilst remaining acceptable to consumers.
- Pasta (plain, no additions)
- Rice (plain, no additions)
- Potatoes (plain, no additions)
- Porridge oats (plain, no additions)
- Breakfast cereals (non HFSS only)

Protein sources

A variety of protein options are recommended by the Eatwell Guide, including beans, pulses, fish and eggs, with an emphasis on plant-based sources. [Around 86% of adults consume some type of meat in Scotland](#), with diets typically characterised by higher intakes of white meat. Evidence demonstrates declining consumption of red and processed meat and increasing consumption of alternatives such as fish, eggs and plant-based products.

Dietary advice in Scotland is for intakes of red and red processed meat to be limited to a maximum of 70g per day among adults, with [26% currently consuming more than this](#). This advice is based on evidence from the [Scientific Advisory Committee on Nutrition](#), for the reduction of colorectal cancer risk.

Including lean protein sources such as chicken would reflect current consumption patterns in Scotland, where chicken dishes account for a substantial proportion of total meat intake, while supporting a shift away from red and processed meat in line with Scottish Dietary Goals. Consideration could also be given to inclusion of a meat alternative, such as tofu, soy mince or soy 'chunks' (alongside beans and pulses) to capture consumers who are actively reducing meat intake/do not eat meat.

Encouraging increased consumption of beans and pulses would help address the [consistently low fibre intakes in Scotland](#). Items such as tinned pulses provide convenient options with a long shelf life and can be used in a range of everyday meals. In addition to health benefits, increasing the availability and affordability of plant-based protein sources would also support wider climate and sustainability goals, given the lower environmental impact of foods of these items compared to animal-based proteins.

Convenient forms of fish such as frozen and tinned [may also be more popular in some households in Scotland](#), particularly those with children. Including an oily fish such as salmon or mackerel would also support achievement of the oily fish Goal.

Potential items could include:

- Eggs
- Tinned beans – such as baked beans, chickpeas, lentils and/or kidney beans
- Tinned tuna and tinned mackerel
- Salmon – could consider frozen option
- Chicken breasts
- Soya-based meat alternative

Dairy and alternatives

Dairy and alternatives are important sources of key nutrients such as calcium. [Most of the population in Scotland consume some dairy \(99%\)](#), and this is largely driven by products such as milk (67% of intake), cheese (14%) and yogurt (9%). Dietary advice in Scotland is for consumers to choose low fat, sugar and salt options.

Dairy alternatives should be included to provide options for those who do not consume animal milks, and these [should be unsweetened and fortified with key micronutrients \(such as calcium, iodine, vitamin B12 and vitamin D\)](#) to help mitigate potential risks of inadequate nutrient intake. [Soya drinks are nutritionally closer to cows' milk, though oat drinks are currently the most commonly consumed](#) dairy alternative drink (around 50%) in the UK.

Potential items could include:

- Semi-skimmed milk
- Plain yogurt
- Cheddar cheese, ideally a reduced fat option. However, it should be noted that many cheeses do not pass the NPM and therefore, if included, cheese would be an exception to this principle.
- Fortified, unsweetened milk alternative

Oils and spreads

Although oils and spreads generally do not pass a NPM, they are essential for cooking and food preparation, helping to support cooking at home where possible. Including options higher in unsaturated fats would support reductions in saturated fat intake [which remain above recommended intakes](#), while ensuring households have access to basic cooking ingredients.

Potential items could include:

- Vegetable/sunflower oil
- Polyunsaturated spread

Additional items to consider: convenience and preprepared items

Inclusion of some convenience/pre-prepared items could also be considered, which would take account of some of the key barriers many individuals face when cooking and preparing food. For example, limited time, varying cooking equipment and skills.

Provided that included options are not classified as HFSS, products in this category could support quick and healthy meal choices while still contributing to a balanced diet.

Potential items could include:

- Tinned vegetable soup
- Pasta sauce

Annexe B: Existing product specifications in use within the retail environment to support healthy diets

The following sections provide an overview of existing item lists and associated product specifications used for the provision and promotion of products within retail environments in Scotland. These may help inform the development of a food price cap. While the overarching principles and categories within these policies are generally aligned with current dietary advice, it should be noted that the underlying product-specific criteria may require revision. Although these criteria were originally designed to support product positioning and promotion rather than price control, the development of a price cap should be guided by the same core principles to support progress towards national Dietary Goals.

Healthcare retail standard

The [Healthcare Retail Standard \(HRS\)](#) is a mandatory requirement for stores in NHS settings across Scotland. It helps promote healthier food and drink options for employees, patients, and visitors, fostering a more health-conscious environment.

Key inclusions within the HRS, and associated criteria are as follows:

- **Fruit and vegetables:** fresh, frozen, tinned, pickled and dried (no added sugar), including potatoes and potato products
- **Beans, pulses and legumes:** all forms, including tinned varieties (e.g. baked beans in sauce)
- **Starchy carbohydrates and grains:** rice, pasta, noodles, couscous, bulgur wheat, quinoa, polenta, breakfast cereals ($\leq 22.5\text{g}$ sugar, $\leq 1.5\text{g}$ salt, $\geq 5\text{g}$ fibre), and wholemeal bread
- **Fish:** fresh, frozen, tinned and processed fish, including oily fish varieties
- **Meat and alternatives:** lean fresh and frozen white/red meat and vegetarian alternatives
- **Dairy and alternatives:**
 - Cheese and alternatives ($\leq 27\text{g}$ fat per 100g)
 - Plain unsweetened yoghurt ($\leq 3\text{g}$ fat per 100g)
 - Lower-fat milk and alternatives ($\leq 1.8\text{g}$ fat per 100ml)
- **Fruit and vegetable juices:** with no added sugar or sweeteners

Scottish grocers healthy living programme

The [Healthy Living Programme \(HLP\)](#) supports small retailers to increase sales, engage customers, and promote healthier choices, with a particular focus on stores serving more deprived communities.

Although small retailers are not currently proposed to be within scope of the price cap policy, Ministers may wish to consider commissioning a review and update of the HLP alongside this work. This would help ensure that communities without access to larger retailers continue to be supported in accessing healthier food options. FSS would be well placed to support any such review.

Summary of core principles

Across these policies, the following principles are aligned with FSS' recommended approach to category and item selection for the price cap:

- Prioritising availability of healthy options in line with dietary advice, including vegetables, fruit and starchy carbohydrates
- Restricting availability of HFSS items
- Nutrition criteria in place for composite items
- Availability of high fibre options available
- Selection of foods should be guided by transparent criteria that balance nutritional quality, consumer purchasing patterns, practicality, inclusivity and supply considerations.