Healthy Food Partnership Reformulation Program: Review and Recommendations

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Executive Summary

The Partnership Reformulation Program (PRP) is a key initiative under the Healthy Food Partnership, which brings together government, industry, and public health stakeholders to make improvements to the Australian food supply. The PRP aims to improve public health by reducing Australians' intake of risk nutrients (sodium, saturated fat and sugar) through voluntary reformulation commitments by food industry. The PRP aims to set ambitious, evidence-informed targets that meaningfully improve the food supply, while remaining technically feasible and commercially realistic to promote broad industry engagement. Maintaining this balance is critical, as participation is voluntary and the PRP's success depends on setting targets that drive measurable health benefits without discouraging companies from taking part.

Waves 1 and 2 of the PRP, running from 2020 to 2025, focused on reformulation targets to reduce sodium, sugar and saturated fat content across a diverse range of food categories. This approach aimed to encourage manufacturers to reformulate products, thereby reducing population intakes of key risk nutrients and contributing to better public health outcomes.

The Healthy Food Partnership Secretariat reviewed the food categories comprising Wave 1 and Wave 2[1] of the PRP to ensure it remains both ambitious and achievable. This process was informed by The George Institute FoodSwitch database (extracts for September 2023 and 2025), industry feedback, comparable international benchmarks (New Zealand, UK, and Canada), and the latest population level dietary intake data (ABS National Nutrition and Physical Activity Survey 2023).

Targeted consultation on the draft recommendations was conducted with the Healthy Food Partnership Executive Committee, Implementation, Evaluation and Monitoring Reference Group, and participation companies. Feedback received through that process was used to further refine the recommendations.

The review recommends some changes to nutrient targets, including both reductions and increases, as well as the introduction of new product categories to better reflect the current market. The primary aim is to preserve or enhance public health outcomes while ensuring technical feasibility and sustaining industry engagement. Where targets are adjusted, this is based on robust data analysis, technical feedback from industry, and consideration of consumer acceptance. The review considers feasibility across the wider market, not just products from companies already participating in the PRP.

Upper limits are proposed for high-consumption staples like soups and yoghurts, while proposed increases to targets were limited to technically constrained categories such as deli meats and pizzas. Modest target adjustments in select categories were offset by strengthening in others, particularly chicken and pork sausages, leading to an overall neutral effect. These changes support continued progress in risk nutrient reduction without compromising industry participation.

Elements of the draft Wave 3 categories have also been considered, reflecting both product and consumption trends and feedback received through the Wave 3 public consultation in 2024. The recommendations include targets for *Sweetened yoghurt: Dairy alternatives* and *Crumbed and battered plant-based proteins* which complement the existing reformulation work on animal-based equivalents.

These recommendations aim to maintain the momentum of sodium, saturated fat and sugar reduction across the food supply, while adapting to new evidence and practical realities found through the administration of the PRP over the past 5 years. The changes outlined will help ensure the PRP remains effective and sustainable into the next phase of implementation.

[1] With the exception of breakfast cereals, which have an end point of 2026.

Introduction

The Partnership Reformulation Program (PRP) is a key initiative under the Healthy Food Partnership, which brings together government, industry, and public health stakeholders to make improvements to the Australian food supply. The PRP aims to reduce population intake of key risk nutrients – sodium, saturated fat and added sugars– through voluntary reformulation of packaged foods. To achieve meaningful improvements in public health, the PRP sets nutrient targets that are ambitious and evidence-informed yet remain technically feasible and commercially realistic to promote broad industry participation. Maintaining this balance is critical, as participation is voluntary and the PRP's success depends on targets that encourage widespread reformulation without creating barriers to engagement.

Waves 1 and 2 of the PRP, implemented from 2020 to 2025, established nutrient reduction targets across a broad range of food categories, focusing on staple foods and products that significantly contribute to Australians' intake of sodium, saturated fat and sugars. With four years of implementation completed per wave, the Healthy Food Partnership Secretariat (the Secretariat) undertook a comprehensive review of these categories and targets to ensure they continue to reflect current market conditions, consumption patterns and technical feasibility. This review is informed by updated FoodSwitch datasets (2023 and 2025), feedback from industry stakeholders, comparable international benchmarks (New Zealand, United Kingdom and Canada), and new consumption data from the 2023 National Nutrition and Physical Activity Survey (NNPAS 2023).

NNPAS 2023 data confirms that Australians' sodium intake remains above recommended levels across all age groups. Additionally sweetened dairy products, cereals and beverages continue to be major contributors to added sugar intake, particularly for children. These findings reinforce the importance of maintaining strong reformulation action in categories that drive population-level exposures, and ensuring emerging categories are appropriately captured as the market evolves.

The report also considers proposed Wave 3 categories. In the November 2024, the Healthy Food Partnership consulted on additional Wave 3 categories for potential inclusion in the PRP. Submissions to the public consultation called for updated population-level consumption data to better inform the development and appropriateness of additional targets. Consumption data from NNPAS 2023 became available in late 2025. Several elements from Wave 3 are proposed to be incorporated into the PRP. These include the addition of plant-based equivalents to existing categories (e.g. sweetened plant-based yoghurts, crumbed and battered plant-based proteins).

This report outlines the findings of the review and presents recommendations to strengthen, relax, adjust or maintain the reformulation targets, alongside proposals for new food categories where gaps in coverage were identified. The overarching aim is to ensure the PRP remains effective, sustainable and aligned with both public health priorities and the practical realities of reformulation. The recommended changes are designed to support ongoing progress across the food supply while preserving voluntary industry engagement, recognising that in many categories, increased participation may deliver a greater population health benefit than further strengthening of targets alone.

Methods

The Secretariat undertook this review of the PRP targets by considering evidence on:

- Proportion of products from participating companies and in the wider market that meet the current reformulation targets.
- Distribution of sodium/sugar/saturated fat within the product category in the wider market.
- Contribution of foods to population intakes of sodium, saturated fat and sugar.
- Market capture of companies participating in the PRP.

- International reformulation targets from New Zealand, UK and Canada.
- Industry feedback and issues raised with the Secretariat about the current targets.

For the full considerations, including NNPAS 2023 data, please see Appendix 4.

All categories and targets underwent a preliminary assessment to flag if adjustment was indicated. Following this assessment, they were categorised into three groups for further consideration. The three groups were determined based on the below principles:

1. Targets to strengthen (i.e. target lowered)
   - International reformulation targets are lower than the PRP targets.
   - Most products on the market meet the target.
   - Food category contributes more than 1% to sodium, sugar and saturated fat intakes in population or certain population groups.

2. Categories and targets to adjust (i.e. target relaxed, definition amended, category split)
   - Most products on the market do not meet the target.
   - Questions and concerns have been raised with Secretariat about reformulation target or category definition.
   - Multi-modal distribution of sodium/sugar/saturated fat within product category indicates different product nutritional profiles of products within the category.
   - Changes in the market since the target was developed (e.g. increased range or spread of products in category).

3. Targets to maintain
   - Participating companies achieve the targets more than the wider market (indicating recruitment is more important that target adjustments).

For targets within groups 1 and 2, an in-depth analysis was undertaken to determine possible changes to the reformulation target or product category. Considerations included processing methods, technical feasibility, role of sugar/sodium in the food, potential public health outcomes vs industry participation, industry feedback, international targets, and consumption in the population.

As part of undertaking this analysis, gaps in reformulation targets were considered (i.e. a source of sodium/sugar/saturated fat in the population's diet that is not adequately captured by the PRP), and new products categories were also proposed.

The form of each reformulation target was selected based on the nutrient distribution within the category and known technical limitations.

- Fixed targets were used where a common benchmark was appropriate across products, such as those categories with normal distribution of the target nutrient.
- Percentage reduction targets were used where baseline nutrient levels varied substantially, allowing higher-content products to make meaningful reductions from their own starting point rather than meet a potentially unrealistic threshold.
- Upper limits were used alongside a main target where most products were already close to or below that target and the distribution had a long upper tail, providing a guardrail for products with substantially higher nutrient levels while recognising that the category was approaching the technical limits of reformulation.

This category-specific approach recognises differences in nutrient distributions and the scope for technically feasible reformulation across food categories.

Consultation

Targeted consultation on draft recommendations was conducted with the Healthy Food Partnership Executive Committee, Implementation, Evaluation and Monitoring Reference Group, and participating companies. A total of fourteen written responses were submitted. This was considered alongside verbal feedback received from the Implementation, Evaluation and Monitoring Reference Group. All feedback received was carefully evaluated to determine whether additional modifications or refinements were warranted. Key themes were consolidated to identify areas of consensus and divergence across respondents. Not all respondents addressed every consultation question; therefore, findings were interpreted in the context of stakeholder expertise and the breadth of perspectives provided, rather than being weighted by the number of responses to individual questions.

Overall, stakeholder feedback indicated broad support for many of the proposed revisions to existing and new categories, with more substantive concerns concentrated in a smaller number of areas where technical feasibility, category definitions, or potential impacts were less certain. Industry stakeholders generally supported the direction of the proposed changes, providing detailed technical input to improve clarity and practicality, while public health stakeholders emphasised strengthening governance, enhancing public health impact, and aligning the PRP with broader dietary objectives and international best practice.

The feedback received through the consultation process was used to further refine the recommendations. The final draft recommendations presented in this report incorporate stakeholder feedback and represent the proposed outcomes of the review, for consideration and endorsement by the Healthy Food Partnership Executive Committee.

For a summary of the consultation and the Secretariat's consideration of the feedback, please see Appendix 5.

Recommendations

1. Targets to strengthen (i.e. target lowered)

The review identified opportunities to further strengthen the PRP by lowering targets in categories where data showed this was feasible. For example, target reductions are recommended for soups and salt & vinegar snacks, reflecting the progress already made by industry and the potential for further improvement.

Table 1. Targets to strengthen details the revised categories and nutrient targets that are designed to enhance the PRP. It includes the current target, the proportion of products on the market currently exceeding these targets, and the rationale for each proposed change.

Table 1. Targets to strengthen

Category	Current target	% meeting current target [2]	Recommendation	Rationale
Savoury snacks: Salt & vinegar snacks	**Sodium** 810mg/100g	74%	Lower to 740mg/100g	New target aligns with NZ target. Most products meet the current target.
Soups	**Sodium** 280mg/100g	80%	Maintain target at 280mg/100g, and introduce upper limit of 300mg/100g.	Many products are very close to the existing target; reflects how these products are consumed (higher quantity of sodium per serving; while soups can provide vegetables and grains, a typical serving provides over 800mg sodium at the current target

[2] As calculated from products in the FoodSwitch databases meeting the current target, prior to the proposed revisions

Category	Current target	% meeting current target [2]	Recommendation	Rationale
				which is almost half of the suggested dietary target for an adult). Differences in age-groups was also considered. Among adults aged 65 and older, the proportion of sodium derived from soup (0.9%) is double that of the population average (0.45%). Noting concerns from stakeholders that further sodium reductions are technically challenging, implementing upper limit to reduce the amount of sodium at the upper end of the product category, capturing 9% of products.
Sweetened yoghurts: mammalian	**Sugar** 12.5g/100g	78%	Lower to 11.5g/100g, and introduce upper limit of 16g/100g. Definition updated, and liquid fermented drinks (kefir) moved to list of exclusions.	In 2021, Executive Committee members agreed to this target being reviewed in 2025. The reduction to 11.5g/10g will be a reasonable stretch for industry and continue to support sugar reduction efforts. 47% of products will be required to reformulate to the meet the revised target. In addition, introduce an upper limit of 16 g per 100 g (approximately the 90th percentile of the category). This ensures that products with the highest sugar content (which may not have reformulated to the lower target) are specifically targeted for reformulation, maximising reduction potential.

2. Categories and targets to adjust (i.e. target relaxed, definition amended, category split)

Several categories were identified where technical and commercial barriers limited reformulation. For example, processed deli meats had a very low adherence rate with the existing sodium target, prompting a recommended increase in the sodium target to a more achievable level that still encourages gradual improvement. Similarly, extruded and pelleted snacks and vegetable, grain, and other snacks showed wide variability in sodium content, leading to either a raised target or, in the latter case, the removal of the category and redistribution of products into more appropriate sub-categories. For pizza, the variation in sodium content of toppings resulted in a split category, with higher sodium allowances for varieties with inherently saltier ingredients (e.g. cured meats).

For saturated fat, dry pastries and sausages were highlighted as categories where the target was not feasible due to differences in product composition and type. Adjustments were made to better reflect these realities, such as raising the target for dry pastries and splitting sausage targets by meat type.

Other enhancements included updating category definitions to reflect market trends, such as expanding the crumbed and battered proteins category to explicitly include plant-based alternatives and clarifying the inclusion criteria for savoury biscuits.

Table 2: Categories and targets to adjust summarises the adjustments proposed for selected Wave 1 categories. This table presents the nutrient, current target levels, percentage of products in the market above the existing target, and the rationale behind each recommended revision.

Table 2. Categories and targets to adjust

Category	Current target	% meeting current target[3]	Recommendation	Rationale
Crumbed & battered proteins: meat and poultry	**Sodium** 450mg/100g	63%	Update sub-category name/inclusions to cover plant-based alternatives. Exclusions updated to add crumbed and battered vegetables and entertaining products.	Reflects market trends and streamlines reformulation categories.
Processed meats: Processed deli meats	**Sodium** 720mg/100g	25%	Increase target to 810mg/100g Whole muscle corned beef has been excluded.	75% of the wider market and 65% of participating products currently exceed the sodium target, highlighting the need for a more achievable benchmark to encourage broader industry participation. The recommended revised target aligns with a Health Star Rating sodium cut-point and encourages improvement.
Ready meals	**Sodium** 250mg/100g	49%	Exclude shelf-stable rice/pasta with fish	Exclude shelf-stable rice/pasta with fish from the ready meal category due to the technical difficulties with achieving a sodium target which was not determined with those meals in mind. In addition, these meals are not a significant contributor to the ready meal category. Other ready meals containing fish (e.g. tuna mornay, tuna bake) remain included.
Sauces: Asian-style cooking sauces	**Sodium** 680mg/100g	47%	Maintain current target (with updated name *Asian-style simmer sauces* and definition). Renamed overarching category to "Sauces" and removed general guidance on application of target. Changes to inclusions: Removed reference to stir-fry sauce. Expanded packaging types. Included 'meal bases' and 'recipe bases' which require only the addition of meat and vegetables.	Updated definition clarifies scope; target is feasible for most products.
Sauces: Other savoury Sauces	**Sodium** 360mg/100g	63%	Maintain current target (with updated name *Pasta, Indian and other*	Expanded definition captures more products; target remains achievable.

[3] As calculated from products in the FoodSwitch databases meeting the current target, prior to the proposed revisions.

Category	Current target	% meeting current target[3]	Recommendation	Rationale
			cook-in style sauces and definition). Changes to inclusions: Included 'meal bases' and 'recipe bases' which require only the addition of meat and vegetables.	
Sausages	**Saturated fat** 7g/100g	55%	Disaggregate category. See table 3.	Natural fat content varies by meat type; split targets reflect these differences and improves feasibility.
Savoury and sweet biscuits: Flavoured savoury biscuits, crackers and 'grain-cake' biscuits	**Sodium** 720mg/100g	64%	Inclusions list has been revised to artisan crackers with dried fruit, nuts, or seeds (e.g., fig and walnut crackers).	Reflects market trends. New products entered the market after the commencement of the PRP that did not fit the definition of Flavoured savoury biscuits, crackers and 'grain-cake' biscuits, but would have been an intended product.
Savoury snacks: Extruded & pelleted snacks	**Sodium** 720mg/100g	49%	Increase to 810mg/100g Soya crisps and rice wheels added to inclusions to list.	Many products exceed current target due to role of sodium in processing; new target better aligns with NZ/UK targets and is more achievable for industry.
Savoury snacks: Vegetable, grain & other snacks	**Sodium** 450mg/100g	43%	Remove category; absorb products into other savoury snack categories.	Category is too broad and variable. Products will be better managed in categories organised by processing method.
Savoury snacks: Potato snacks	**Sodium** 500mg/100g	62%	Maintain target, while updating name and expanding inclusions to other vegetable chips and excluding reformed varieties.	This aligns with UK definition and better reflects the different vegetable chips available in the current market. The target is aligned with NZ and WHO Global Sodium Benchmarks (2021).

3. New categories

To better reflect the diversity of products on the market and to set technically feasible targets, several new categories are proposed to be introduced. For sodium, these are thick pastes for Asian-style cooking (which are used in small quantities and have higher sodium due to their concentrated nature), and sheeted and reformed snacks (to distinguish them from extruded and pelleted products).

Data from NNPAS 2023 indicates that sweet biscuits contribute approximately 1.5% of total sodium intake for Australians aged two years and over, which is higher than the contribution from savoury biscuits (1.0%), a category that already has a reformulation target. Given this significant contribution and the widespread consumption of sweet biscuits, a sodium reformulation target for this category is recommended to help reduce overall sodium intake in the population.

The proposed introduction of a sugar reformulation target for sweetened plant-based yoghurt alternatives reflects their growing presence in the market and their contribution to added sugar intake. While mammalian yoghurt already has a target, plant-based versions were previously excluded due to differences in intrinsic sugars. However, these products often contain added sugars at levels comparable to or higher than dairy yoghurt, making them relevant for reformulation. During targeted consultation, industry supported the

inclusion of plant-based yoghurt in the PRP, recognising the importance of consistent standards across similar product types. Establishing a target for this category will help reduce added sugar intake, particularly among consumers seeking dairy alternatives.

For saturated fat, the sausage category was split into subcategories for chicken/pork and beef/lamb, acknowledging the natural differences in fat content and the challenges of achieving a single target across all types.

Table 3 provides an overview of the new categories. It outlines the specific nutrient of concern, category definition, proposed target, and offers the rationale behind the recommendation.

Table 3. New categories

Category	Definition[4]	Proposed target	Rationale
Bread: Leavened bread with additions	Leavened bread loaves and rolls with high sodium additions.	**Sodium** 480mg/100g	Recognises higher sodium from added ingredients; encourages sodium reduction across more bread types while allowing for realistic reformulation. 33% of intended products meet the proposed target across a range of product types.
Pizza: Pizza with cured meat toppings	Commercially produced pizza dough, with cured-meat toppings (may also include vegetable, cheese, uncured meat, fish or alternatives toppings) which only requires cooking or re-heating (i.e. no construction). Pizzas without cured meat toppings (as defined in 9.2) are excluded. Includes chilled and frozen varieties.	**Sodium** 550mg/100g	Sodium content varies by topping; splitting allows more realistic targets for each type. 58% of pizzas with cured meat toppings were above the previous target. The revised target is more realistic, with 47% of products above the target.
Pizza: Pizza with all other toppings	Commercially produced pizza dough with toppings (vegetable, cheese, uncured meat, fish or alternatives) which only requires cooking or re-heating (i.e. no construction). Pizzas with cured meat toppings (as defined in 9.1) are excluded. Includes chilled and frozen varieties.	**Sodium** 450mg/100g	Sodium content varies by topping; splitting allows more realistic targets for each type. 40% of pizzas without cured meat toppings are above the 2020 target for pizzas. This target has been retained for non-cured meat varieties.
Sauces: thick pastes and sauces	Thick pastes and sauces used in very small quantities per serve (e.g. 20-30g) such as curry and Thai pastes. Products within this category may require the addition of liquids such as tomato-based sauces, cream, or coconut milk. Note the example serve size is a guideline only.	**Sodium** 2000mg/100g	Higher sodium is technically necessary; products are used sparingly; aligns with international approaches.
Sausages: chicken/pork	Minced chicken and/or pork, encased in a skin, sold raw and requiring cooking before eating. Product categorisation should be determined based on the species contributing the highest proportion of meat/poultry content in the product.	**Saturated fat** 6g/100g	Lower natural fat content in these meats. Revised target is achievable and encourages reformulation. 44% of products are above the revised target.
Sausages: beef/lamb/veal	Minced meat (beef/lamb/veal) encased in a skin, sold raw and requiring cooking before eating.	**Saturated fat** 8.5g/100g	Higher target to allow for natural fat content. Revised target is achievable and encourages reformulation. At the target

[4] See Appendix 1 for the inclusions and exclusions for each category.

Category	Definition[4]	Proposed target	Rationale
	Product categorisation should be determined based on the species contributing the highest proportion of meat content in the product.		of 7g/100g, 80% of beef and lamb sausages were above the target. Only 63% of products are above the revised target.
Savoury and sweet biscuits: Sweet biscuits	Commercially prepared sweet biscuits, made with or without added flavourings, chocolate, fruit or nuts.	**Sodium** 350mg/100g	Data from NNPAS 2023 showed sweet biscuits make a significant contribution to sodium intake across all age groups, but particularly young children and older adults.
Savoury snacks: Sheeted & reformed snacks	Starch-rich materials (e.g. corn, maize, wheat, rice, potato flour) or legume flours used to make a dough, which is then reformed or sheeted to thin, uniform dimensions and cut to form the snack and fried or baked. Sold as ready-to-eat.	**Sodium** 520mg/100g	Processing method differs from extruded snacks, allows for more realistic targets and clearer categorisation for food companies, based on processing method.
Sweetened yoghurt: Dairy alternatives	Sweetened yoghurt made from non-dairy ingredients	**Sugar** 7g/100g	Plant-based versions were excluded from the other yoghurt category due to differences in intrinsic sugars. The introduction of a target for plant-based versions was supported by industry during targeted consultation.

4. Categories considered for adjustment but maintained

During the review of sodium and saturated fat targets, all categories were closely examined to determine whether further adjustments were needed to improve feasibility or public health impact. In some cases, although potential changes were considered – such as strengthening targets, splitting categories, or redefining inclusions – the evidence showed that the current targets remained appropriate and achievable for the category. As a result, these categories were retained in their existing form. Table 4 outlines these categories, the adjustments considered, and the rationale for maintaining the current approach.

Market share of participating companies was also considered. In many cases, recruitment of additional companies to the PRP will have a greater impact on public health than further changes to the targets would.

Table 4. Categories considered for adjustment but maintained

Category	Current target	% meeting the current target[5]	Adjustment considered	Rationale for maintaining current target/category
Bread: Leavened bread	**Sodium** 380mg/100g	59%	Lowering target	Industry have noted that while the target in the UK and NZ is lower, the conditions in AUS make lower targets unfeasible (humidity, hotter temperatures, and ageing manufacturing plants).
Bread: Flat breads	**Sodium** 450mg/100g	61%	Lowering target or splitting	One company raised technical feasibility issues for tortillas, however careful analysis of the data found many varieties of tortillas below the current target (including market leaders), showing feasibility.

[5] As calculated from products in the FoodSwitch databases meeting the current target.

Category	Current target	% meeting the current target[5]	Adjustment considered	Rationale for maintaining current target/category
Cheese: Cheddar and cheddar-style cheese	**Sodium** 710mg/100g	74%	Lowering target	Technical and sensory constraints for reducing further; aligns with NZ/UK targets.
Cheese: Processed cheeses	**Sodium** 1270mg/100g	62%	Lowering target	Technical constraints and international alignment; further reduction not feasible for all products.
Crumbed & battered proteins: Fish	**Sodium** 270mg/100g	47%	Adjusting target	Targets already align with international benchmarks; technical feasibility confirmed; adherence is very high for participating companies (73%), recruiting more companies to the PRP has a greater potential for population impact.
Crumbed & battered proteins: Prawns, squid and calamari	**Sodium** 470mg/100g	40%	Adjusting target	Targets already align with international benchmarks; technical feasibility confirmed; adherence is very high for participating companies (80%), recruiting more companies to the PRP has a greater potential for population impact.
Flavoured milk: mammalian	**Sugar** 9g/100g	37%	Lowering target	Aligns with NZ. All participating products meet the target, recruiting more companies to the PRP has a greater potential for population impact.
Flavoured milk: dairy alternatives	**Sugar** 5g/100g	63%	Lowering target	Aligns with NZ. All participating products meet the target, recruiting more companies to the PRP has a greater potential for population impact.
Muesli and snack bars	**Sugar** 25g/100g, and a 15% reduction for products over 28.5g/100g	68%	Splitting or lowering target	Wide variation in sugar content with no clear distinction by product type; aligns with NZ.
Non-alcoholic beverages: Flavoured water, flavoured mineral water, soda water and iced tea	**Sugar** 5g/100g	66%	Lowering target	Aligns with NZ. All participating products meet the target, recruiting more companies to the PRP has a greater potential for population impact.
Non-alcoholic beverages: Carbonated soft drinks and energy drinks	**Sugar** 10% reduction for products over 10g/100g	44%	Adjusting target	Target is challenging, but achievable.
Non-alcoholic beverages: Fruit drinks	**Sugar** 9.5g/100g	58%	Lowering target	Aligns with NZ. Adherence is high for participating companies (73%), recruiting more companies to the PRP has a greater potential for population impact.
Pizza	**Saturated fat** 4g/100g	60%	Splitting by topping type for saturated fat; removing target.	Wide variation in saturated fat content with no clear distinction by topping type; considered removing target – industry feedback that there are no saturated fat targets for meat and cheese, which are

Category	Current target	% meeting the current target[5]	Adjustment considered	Rationale for maintaining current target/category
				the predominant source of saturated fat in these products – however scrutiny of the data suggests current target is feasible.
Processed meat: Ham	**Sodium** 1005mg/100g	52%	Lowering target	Target is already challenging; aligns with NZ.
Processed meat: Bacon	**Sodium** 1005mg/100g	65%	Lowering target	Target is already challenging; aligns with NZ.
Processed meat: Frankfurts & saveloys	**Sodium** 900mg/100g **Saturated fat** 6.5g/100g	31% 81%	Lowering target	Targets are already challenging; further reduction is not technically feasible for all products.
Sauces: Gravies & finishing sauces	**Sodium** 450mg/100g	58%	Lowering target	Adherence is high for participating companies (69%), recruiting more companies to the PRP has a greater potential for population impact.
Sauces: Pesto	**Sodium** 720mg/100g	53%	Lowering target	Adherence is high for participating companies (67%), recruiting more companies to the PRP has a greater potential for population impact.
Sausages	**Sodium** 540mg/100g	43%	Adjusting target	Target is challenging while remaining technically achievable for all meat types; aligns with UK.
Savoury and sweet biscuits: Plain savoury crackers & biscuits	**Sodium** 630mg/100g	68%	Lowering target	Targets align with international benchmarks; adherence is very high for participating companies (91%), recruiting more companies to the PRP has a greater potential for population impact.
Savoury and sweet biscuits: Plain corn, rice & Other 'grain-cake' biscuits	**Sodium** 270mg/100g	88%	Lowering target	All participating products meet the target; focus on recruitment.
Savoury snacks: popcorn	**Sodium** 360mg/100g	49%	Adjusting target	Target is already challenging, but achievable; adherence is very high for participating companies (89%), recruiting more companies to the PRP has a greater potential for population impact.
Savoury pastries: Dry pastries	**Sodium** 500mg/100g	69%	Adjusting target	Aligns with international benchmarks; further reduction not technically feasible.
Savoury pastries: Wet Pastries	**Sodium** 400mg/100g	53%	Adjusting target	Further reduction not technically feasible.
Savoury pastries: Wet Pastries	**Saturated fat** 7g/100g	85%	Excluding party pies	Considered exclusion of party pies based on the assumption of a higher ratio of pastry to filling makes the target unfeasible for party-sized products. Examination of the data found this not to be the case, with only 2 out of 8 party-

Category	Current target	% meeting the current target[5]	Adjustment considered	Rationale for maintaining current target/category
				sized products with a saturated fat content above 7g/100g. Target is considered feasible for all products.
Sweet bakery: cakes, muffins, and slices	**Sodium** 360mg/100g	71%	Adjusting target	Aligns with international benchmarks; further reduction not technically feasible for all products.

5. New categories considered but not progressed

There were five new categories considered for inclusion in the program through the initial screening process that were not progressed. Some of the categories put forward as part of Wave 3 have been adopted into the targets. The Secretariat considered the feedback received through the November 2024 consultation on Wave 3, along with changes in the market and NNPAS 2023 data, when making this decision. Tomato sauce was initially flagged for inclusion in the program but was not progressed when further evidence was presented during the targeted consultation phase of the review. Table 5 outlines the rationale for not proceeding with these categories.

Table 5. New categories considered

Category	Rationale for not proceeding with target for category
Plant-based meat alternatives – Uncrumbed	A sodium reformulation target has not been set for uncrumbed plant-based meat alternatives due to their currently low consumption at a population level, as reflected in NNPAS 2023. In addition, market data indicate a recent decline in the popularity and sales of plant-based meat alternatives, limiting the potential population-level impact of introducing a sodium target.
Plant-based meat alternatives – Processed deli-style meat alternatives and meat-free bacon	A sodium reformulation target has not been set for processed plant-based deli-style meat alternatives and meat-free bacon, recognising their very low contribution to overall dietary sodium intake at a population level. The average sodium content of these products is half that of traditional processed deli-meats. Consumption of these products remains limited, and declining uptake of plant-based meat alternatives further reduces the potential public health benefit of setting a category-specific target.
Flavoured tofu and tempeh	A sodium reformulation target has not been set for flavoured tofu and tempeh given their low consumption in the Australian diet and limited contribution to population sodium intake according to NNPAS 2023. While some products may contain added sodium for flavouring, overall intake remains low and does not warrant prioritisation for reformulation through the Partnership at this time. Continued monitoring will ensure emerging trends or increased consumption can be addressed if needed.
Packaged salads	A sodium reformulation target has not been set for pre-packaged vegetable-dominant salads due to their important role as a source of vegetables in the Australian diet. While some products may contain sodium from dressings or added ingredients, this is partially offset by the naturally high potassium content of vegetables, which helps counterbalance sodium intake. Starch-dominant salads, such as potato and pasta salads (both fresh and shelf-stable), are excluded from this category and are instead explicitly captured within the ready meals category, where sodium targets are more appropriate given their composition and consumption context.

Category	Rationale for not proceeding with target for category
Sauces: tomato sauce	Sodium and sugar reformulation targets were considered for tomato sauce. Feedback on this category received through targeted consultation noted that reduced sodium/sugar varieties are available, and reducing the sodium/sugar on regular varieties would interfere with ability to make nutrition content claims for reduced sodium/salt products. It was also noted that this category contributes small amounts of sodium/sugar to overall population intakes.

Assessment of Overall Impact

The recommendations of the review include a mix of target reductions (strengthening) and target increases (to improve feasibility), as well as new categories to reflect the current market. The overall intent was to maintain or enhance public health impact while ensuring technical feasibility and promoting industry participation.

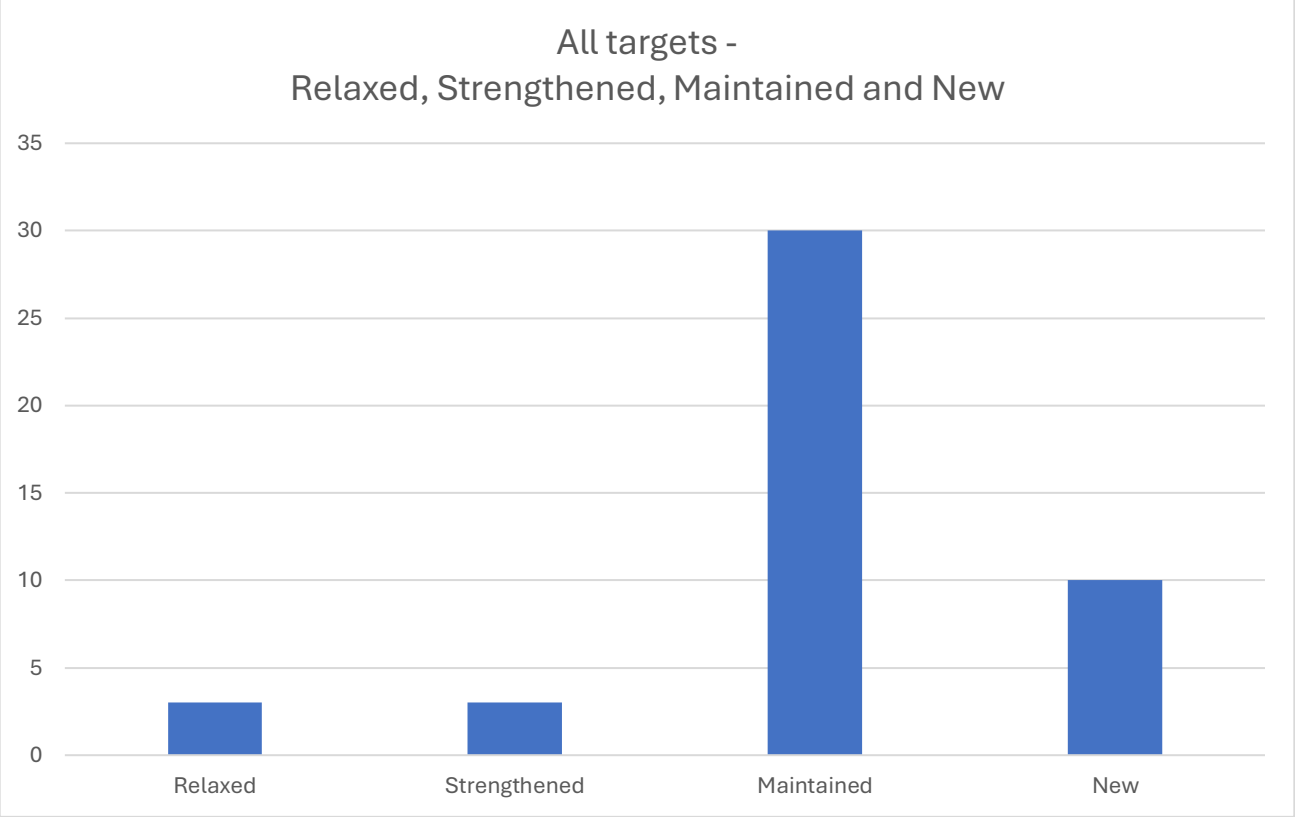
For sodium, reductions were applied to categories where reformulation was already well underway and further improvement was considered feasible - most notably salt and vinegar snacks. In contrast, targets were increased in categories where technical constraints were evident, such as processed deli meats, extruded snacks, and pizzas with cured meat toppings. These adjustments were made to support continued industry participation while still encouraging improvement. Because the increases were limited to smaller or technically constrained categories, the overall effect is expected to be neutral to slightly positive in terms of net sodium reduction (see *Figure 1. Count of targets relaxed, tightened, maintained and new*).

Saturated fat targets were also adjusted to reflect both feasibility and public health priorities. A tighter target was introduced for sausages made from chicken and pork, recognising the lower natural fat content of these meats and the opportunity for further reformulation. At the same time, modest increases were made for dry pastries and sausages made from beef and lamb, acknowledging the technical challenges and natural fat profiles of these products. These changes were limited to categories with low adherence and are expected to result in a neutral overall impact on saturated fat levels.

The tightening of the sugar target for sweetened yoghurt reflects both the assessed feasibility of further reductions and the importance of this category in the diets of children. This adjustment supports the broader goal of reducing added sugar intake across the population, particularly in products that are widely consumed and perceived as healthy.

Taken together, the changes across sodium, saturated fat and sugar reflect a balanced approach - strengthening targets where feasible, adjusting them where necessary to reflect technical realities, and introducing new categories to improve clarity and coverage. This approach ensures the PRP remains effective, sustainable, and responsive to both public health needs and industry capability.

Figure 1. Count of targets relaxed, tightened, maintained and new



Public Health Perspective

The combination of lowering targets in staple categories (e.g. yoghurt), maintaining ambitious targets where feasible, and introducing new categories for clarity and better coverage means the PRP will continue to drive incremental sugar, sodium and saturated fat reduction, while avoiding unrealistic targets that could undermine participation.

Reporting and future reviews

The reporting process will be streamlined following the 5-year reporting for breakfast cereals (June 2026) by aligning the Wave 1 and 2 reporting dates. This will reduce administrative burden on the Secretariat and participating companies.

Baseline will be the date that the category/target was introduced (e.g. baseline for *Leaved bread* will remain July 2020, and for *Sausages: beef/lamb* baseline will be July 2026). Companies new to the PRP that don't have access to historical data can determine a suitable baseline in consultation with the Secretariat based on data availability.

The updated reporting dates for the PRP will be:

- Breakfast Cereals: 5-year progress report due 30 June 2026.
- The next reporting date for Waves 1 and 2 combined (excluding breakfast cereals) will be 30 June 2027, then 2 yearly for all categories going forward (June 2029, June 2031 etc).

The implementation timeframe for each target is 4 years. The categories and targets will be reviewed on a 4-yearly cycle. The next review will commence in 2029, for implementation from 2030[6].

[6] A review of Breakfast cereals post-June 2026 will be considered based on participating company reports.

Appendix 1 – Category definitions and reformulation targets

A revised list of category definitions has been compiled. Small changes have been made to existing categories to clarify inclusions and exclusions. Where these changes are significant, or where new categories have been developed, these additions have been made in red text.

Partnership Food Category and definition	Inclusions	Exclusions	Nutrient target (maximum)
1. Bread ***Products made by baking a dough prepared from cereal flours or meals and water. Includes bread mixes.***			
1.1 Leavened breads *Products made by baking a yeast-leavened dough prepared from cereal flours or meals and water and bread mixes.*	Loaf bread (e.g. white, rye, oat, wholemeal, multigrain, soy/linseed, other seed, omega-3 enriched, low GI, added vegetables e.g. pumpkin bread), un-iced fruit bread/rolls/buns, bread mixes, raisin toast, sourdough, baguettes, focaccia, bagels, bread rolls, bread thins, damper, hot cross buns (incl. sweet flavoured varieties), English muffins. Includes gluten-free alternatives.	Savoury flavoured products (e.g. cheese and bacon or spinach or vegemite rolls/scrolls, garlic bread), flatbreads, breadcrumbs, crumpets, scones, croissants, bread-like cakes (including but not limited to brioche, panettone and stollen), biscuits, crackers and breadsticks (e.g. grissini's), individual ingredients for bread (e.g. flour, yeast).	**Sodium** 380mg per 100g
1.2 Flat breads *Products made by baking an unleavened or slightly-leavened dough prepared from cereal flours or meals and water.*	Flat bread, pita/pocket breads, Turkish bread, naan, Lebanese bread, chapatti, roti, tortilla, wraps, Lavash bread, plain pizza bases includes gluten-free alternatives. Flat breads provided in meal kits.	Flat breads with toppings, completely leavened breads (e.g. loaf bread, sweet breads, focaccia, buns), sweetened flat bread, crispbreads, dough and mixes.	**Sodium** 450mg per 100g
1.3 Leavened breads with additions *Leavened bread loaves and rolls with high sodium additions.*	Leavened breads (as defined at category 1.1 above) with high sodium additions (e.g. cheese, bacon, vegemite, olives, sundried tomatoes, pizza sauce etc.), scrolls and rolls with high sodium additions (e.g. vegemite scrolls, ham and cheese rolls etc.). Includes gluten-free alternatives.	Leavened breads without high sodium additions (see category 1.1), flat breads (see category 1.2), garlic bread, biscuits, crackers and breadsticks (e.g. grissini's), Pizza (see categories 8.1 and 8.2).	**Sodium** 480mg per 100g

Partnership Food Category and definition	Inclusions	Exclusions	Nutrient target (maximum)
Breakfast cereals ***Commercial breakfast cereals made from flakes, puffed grains, processed grains, and fruit/flake mixtures with added ingredients, designed to be eaten cold, and not requiring further cooking or processing.***			
2.1 Breakfast cereals with fruit *Commercial breakfast cereals with added dried fruit.*	All cereal products containing dried fruit, e.g. plain or flaked cereals with dried fruit, mueslis and oats with dried fruit, grain-free cereals with dried fruit. Products with both dried fruit and fruit puree are also included. Includes gluten-free varieties.	Commercial breakfast cereals without dried fruit (see category 2.2). Products containing fruit puree or pastes without dried fruit (see category 2.2). Plain ready-to-eat breakfast cereals with nothing added (e.g. plain flakes, plain puffed grains/cereals and other processed grains, processed bran, oat bran, oats, wheat germ). Breakfast biscuits (e.g. Belvita Milk & Cereal Breakfast Biscuits). Cereal-containing beverages.	**Sugar** 22.5g per 100g AND at least a 20% reduction for products containing over 28g sugar/100g
2.2 Breakfast cereals without fruit *Commercial breakfast cereals without dried fruit. May contain fruit pastes/ purees. Products may contain coconut.*	Ready to eat breakfast cereals - plain or mixed flakes, mueslis without dried fruit, fruit-paste filled wheat pillows, granolas without fruit, cereal/wheat 'biscuits' (e.g. Vita Brits, Weet-Bix), grain-free cereals without dried fruit, clusters and oat products designed to be consumed as a cereal (e.g. oat sachets). Includes gluten-free varieties.	Commercial breakfast cereals with dried fruit (see category 2.1). Plain ready-to-eat breakfast cereals with nothing added (e.g. plain flakes, plain puffed grains/cereals and other processed grains, processed bran, oat bran, oats, wheat germ). Breakfast biscuits (e.g. Belvita Milk & Cereal Breakfast Biscuits). Cereal-containing beverages. Mueslis without added sugar.	**Sugar** 20g per 100g AND at least a 20% reduction for products containing over 25g sugar/100g
2.3 Plain puffed or flaked or extruded breakfast cereals *Plain puffed or flaked or extruded breakfast cereals, made from rice, corn, wheat, or other grains, without other ingredients (e.g. fruit, nuts, coconut)*	Puffed or flaked or extruded breakfast cereals, made from rice, corn, wheat, or other grains with or without additional flavours such as cocoa or cinnamon (e.g. Rice Bubbles, gluten free rice flakes, Corn Flakes, All Bran, processed bran, Weeties, quinoa flakes, Special K, Cocoa Pops).	Puffed or flaked or extruded breakfast cereals with other ingredients such as fruit, nuts or coconut (see category 2.4). Plain cereal biscuits (see category 2.5). Cereal-containing beverages ('breakfast drinks'). Plain ready-to-eat breakfast cereals with nothing added (e.g. plain flakes, plain puffed grains/cereals and other processed grains, processed bran, oat bran, oats, wheat germ). Breakfast biscuits (e.g. Belvita Milk & Cereal Breakfast Biscuits). Mueslis, porridge and flavoured breakfast oats.	**Sodium** 450mg per 100g

Partnership Food Category and definition	Inclusions	Exclusions	Nutrient target (maximum)
2.4 All other ready-to-eat cereals *All other breakfast cereals made from flakes, puffed grains, processed grains, and mixtures not included in other categories. Includes puffed or flaked or extruded breakfast cereals, made from rice, corn, wheat, or other grains with other ingredients (e.g. fruit, nuts, coconut).*	All other flavoured ready-to-eat breakfast cereals including mixed flakes, fruit and flake mixtures (e.g. Just Right, Sultana Bran, Uncle Toby's Plus, Special K Forest Berries), fruit filled wheat pillows (e.g. Fruity Bites), flavoured cereal biscuits (e.g. Honey Weet-Bix, weet-bix bites), all other ready-to-eat cereals including those with other ingredients (e.g. Crunchy Nut Corn Flakes).	Plain puffed or flaked or extruded breakfast cereals, made from rice, corn, wheat, or other grains without other ingredients (see category 2.3). Plain cereal biscuits (see category 2.5). Cereal-containing beverages ('breakfast drinks'). Plain ready-to-eat breakfast cereals with nothing added (e.g. plain flakes, plain puffed grains/cereals and other processed grains, processed bran, oat bran, oats, wheat germ). Breakfast biscuits (e.g. Belvita Milk & Cereal Breakfast Biscuits). Mueslis, porridge and flavoured breakfast oats.	**Sodium** 270mg per 100g
2.5 Plain cereal biscuits *Cereal biscuits marketed as plain and designed to be consumed cold with milk. May be made from wheat or gluten-free alternative and may contain salt or sweeteners but no other added flavours.*	Plain cereal/wheat 'biscuits' (e.g. Vita Brits, Weet-Bix). Gluten-free, multigrain or high fibre unflavoured cereal biscuits.	Plain puffed or flaked or extruded breakfast cereals, made from rice, corn, wheat, or other grains without other ingredients (see category 2.3). Puffed or flaked or extruded breakfast cereals with other ingredients such as fruit, nuts or coconut (see category 2.4). Cereal-containing beverages ('breakfast drinks'). Plain ready-to-eat breakfast cereals with nothing added (e.g. plain flakes, plain puffed grains/cereals and other processed grains, processed bran, oat bran, oats, wheat germ). Breakfast biscuits (e.g. Belvita Milk & Cereal Breakfast Biscuits). Mueslis, porridge and flavoured breakfast oats.	**Sodium** 300mg per 100g
Cheese ***Hard and soft cheese products made from dairy, including processed and unprocessed varieties***			
3.1 Cheddar and cheddar style variety cheese products *Mild, matured, tasty, extra tasty, vintage and other cheddar cheeses.*	Cheddar cheeses: mild, matured, semi-matured, tasty, extra tasty, vintage and smoked. Includes all fat varieties (e.g. full fat, reduced fat) and all forms (e.g. block cheeses, slices and grated).	All non-cheddar cheese products, (e.g. Colby, Swiss, gouda, mozzarella, parmesan), all soft and unripened cheeses (e.g. fetta, cream cheese, brie), 'Protected Designation of Origin' cheeses (e.g. some pecorinos), processed cheddar cheeses (e.g. Kraft Dairylea Cheddar cheese) and cheddar-flavoured cheeses.	**Sodium** 710mg per 100g

Partnership Food Category and definition	Inclusions	Exclusions	Nutrient target (maximum)
3.2 Processed cheeses *All processed cheese products; products obtained from milk, heated and melted, usually with added emulsifying salts, to form a homogeneous mass.*	Processed cheese sold in all forms, including slices (e.g. Kraft singles, Bega super slices, Hillview light cheese slices, Devondale sandwich slices), grated, blocks (e.g. Kraft Dairylea Cheddar) or in other forms (e.g. Dairylea Fridge Sticks, Dairylea Cheddar Cream Cheese Spread). Products may be shelf-stable or chilled	Hard or soft cheeses not processed in the manor outlined in the definition, soy or other dairy alternatives, cream-cheeses or cream-cheese based products (e.g. Philadelphia cream cheese, cream-cheese based dips).	**Sodium** 1270mg per 100g
Crumbed and battered proteins ***Meat, poultry and seafood which have been coated with a crumb or batter made from flour or flour-alternative. Including chilled and frozen varieties.***			
4.1 Meat and poultry and plant-based alternatives *Meat (e.g. beef, veal, lamb) and poultry (e.g. chicken, turkey), and plant-based analogues (e.g. seitan, tofu, soy protein etc.) which have been coated with a crumb or batter.*	Schnitzels, garlic Kievs, nuggets, crumbed chicken, crumbed tofu, crumbed soy protein or seitan, crumbed burger patties and crumbed/ battered rissoles. May be whole or in pieces, fresh or frozen. Includes gluten-free varieties.	Marinated or seasoned products without crumbing or batter, products with added savoury sauce, flavourings or additions (e.g. chicken parmigiana, ready meal of schnitzel with vegetables, ham and cheese Kiev), potato-based dishes, meatloaf, plain (not crumbed/battered) patties, uncoated rissoles, crumbed or battered cheeses, seafood and vegetables, entertaining style products (dim sims, spring rolls, arancini balls, croquettes, mozzarella balls and haloumi chips).	**Sodium** 450mg per 100g
4.2 Fish *Fish which has been coated with a crumb or batter.*	Crumbed or battered fish (e.g. fish fingers, fish fillets, salt and pepper variants). May be whole or in pieces, fresh or frozen. Includes gluten-free varieties.	Squid, calamari, shellfish, molluscs, and other forms of seafood. Marinated or seasoned products without crumbing or batter, products with added savoury sauce, flavourings or additions (e.g. ready meal of battered fish with vegetables), potato-based dishes (e.g. croquettes and fish cakes), vegan/vegetarian alternatives, crumbed or battered cheeses, meats, nuts or other non-seafood protein sources.	**Sodium** 270mg per 100g
4.3 Prawns, squid and calamari P*rawns, squid or calamari which has been coated with a crumb or batter*	Crumbed or battered squid, prawns and calamari (e.g. crumbed calamari, crumbed prawns, salt and pepper variants). May be whole or in pieces, fresh or frozen. Includes gluten-free varieties.	Fish or fish variants. Marinated or seasoned products without crumbing or batter, products with added savoury sauce, flavourings or additions (e.g. ready meal of curried prawns and rice), potato-based dishes (e.g. prawn croquettes), vegan/vegetarian alternatives, crumbed or battered cheeses, meats, nuts or other non-seafood protein sources.	**Sodium** 470mg per 100g

Partnership Food Category and definition	Inclusions	Exclusions	Nutrient target (maximum)
Flavoured milk ***Dairy or dairy alternative liquid ready-to-drink milks with added non-nutritive- and sugar-sweetened flavourings.***			
5.1 Flavoured milk: mammalian *Mammalian milk with added flavour(s).*	Chocolate, vanilla, coffee, strawberry or other prepared, ready-to-drink, flavoured dairy milk drinks. Includes ready-to-drink, portion sized beverages, eggnog and lactose free varieties. Includes all fat varieties (e.g. full fat, reduced fat), non-nutritive- and sugar-sweetened milks.	Plain milks (e.g. cow's milk, evaporated milk, buttermilk). Flavoured milk alternatives (see category 5.2). Dry beverage flavourings (e.g. NESQUICK) and straws with integrated flavourings (e.g. Sippahh). Smoothies, meal replacements, protein shakes. Breakfast beverages (e.g. Up&Go). Formulated supplementary foods (e.g. Milo, Sustagen). Probiotic drinks (e.g. kefir, Yakult) and bubble tea. Frozen dairy desserts.	**Sugar** 9g per 100ml
5.2 Flavoured milk: Dairy alternatives *Any dairy milk substitute with added flavour(s).*	Chocolate, vanilla, strawberry or other prepared, ready-to-drink, flavoured soy, oat, nut, rice, coconut or other dairy alternative milks. Includes all fat varieties (e.g. full fat, reduced fat), non-nutritive and sugar-sweetened milks.	Plain milks (e.g. original/plain soy milk). flavoured animal milks (see category 5.1). Dry beverage flavourings (e.g. NESQUICK) and straws with integrated flavourings (e.g. Sippahh). Smoothies, meal replacements, protein shakes. Breakfast beverages (e.g. Up&Go). Formulated supplementary foods (e.g. Milo, Sustagen). Probiotic drinks (e.g. kefir, Yakult) and bubble tea. Frozen dairy desserts.	**Sugar** 5g per 100ml
Muesli and snack bars ***Baked or cold-formed cereal-based snack bars, based on cereals and/or nuts and/or seeds and/or fruit, may contain fruit, nuts, seeds, chocolate or yoghurt chips/ or coating or other fillings and toppings.***			
6.1 Muesli and snack bars *Baked or cold-formed cereal-based snack bars, based on cereals and/or nuts and/or seeds and/or fruit, may contain fruit, nuts, seeds, chocolate or yoghurt chips/ or coating or other fillings and toppings.*	Muesli bars, muesli slices, breakfast bars, granola bars, oat bars, nut bars, fruit-filled cereal bars and twists. May also include other ingredients including wheat, oats, puffed rice or other grains nuts, dried fruit, fruit puree, honey/sugars, yoghurt or chocolate. Also includes fruit bars / leathers / chews / strings / straps that are not 100% fruit. Also includes bliss balls and energy balls with added sugar, and products based on nuts, seeds or cereals, marketed as 'protein bars' / 'energy bars' / 'low carb bars' where protein powder/blends is added as an ingredient but is not the principle ingredient.	100% fruit bars / leathers / chews / strings / straps, bliss balls and energy balls with no added sugar. Also excludes products marketed as 'protein bars', 'energy bars', 'low carb bars', where protein powder/blend is the principle ingredient, as well as formulated supplementary sports foods. Excludes products that contain less than 10% of energy content from added sugar*.	**Sugar** 25g per 100g AND at least a 15% reduction for products containing over 28.5g per 100g

Partnership Food Category and definition	Inclusions	Exclusions	Nutrient target (maximum)
Non-alcoholic beverages *Ready-to-drink non-dairy beverages with caloric sweeteners.*			
7.1 Flavoured water, flavoured mineral water, soda water and iced tea *Ready-to-drink, non-dairy beverages with caloric sweeteners, excluding soft drinks, fruit drinks and energy drinks.*	Vitamin waters, coconut water, sparkling flavoured waters (e.g. flavoured mineral or soda water) and iced tea. Products sold as ready-to-drink.	Fruit drinks (see category 7.3). Soft drinks and energy drinks (see category 7.2). Smoothies. Unsweetened tea and plain mineral/spring/soda water. Cordials. Juices. Drink powders or concentrates. Kombucha and water-kefir (and similar products where the majority of sugar has been fermented) and diet or low kJ (<80kJ/100ml) drinks.	**Sugar** 5g per 100mL
7.2 Carbonated soft drinks and energy drinks *Ready-to-drink, non-dairy, sweetened drinks marketed as soft drinks or energy drinks.*	Carbonated soft-drinks, energy drinks (Formulated Caffeinated Beverages). Products sold as ready-to-drink.	Flavoured water, flavoured mineral water, soda water and iced tea (see category 7.1). Fruit drinks (see category 7.3). Sports and electrolyte drinks. Cordials. Juices. Drink powders or concentrates. Kombucha and water-kefir (and similar products where the majority of sugar has been fermented) and diet or low kJ (<80kJ/100ml) drinks.	**Sugar** A 10% reduction for products above 10g per 100mL
7.3 Fruit drinks *Ready-to-drink fruit drink (carbonated or still), containing less than 96% fruit juice, with added sugar.*	Ready to drink Fruit Drinks, as defined in Standard 2.6.2 of the Food Standards Code, with added sugar.	Fruit juice (containing a minimum 96% juice). Fruit drinks without added sugar. Non-nutritive sweetened fruit drinks. Carbonated fruit juices. Fruit and vegetable juice blends. Cordials and similar products requiring reconstitution. Smoothies.	**Sugar** 9.5g per 100ml
8. Pizza *Commercially produced pizza dough, with toppings (vegetable, cheese, meat, fish or alternatives) which only requires cooking or re-heating (i.e. no construction). Includes chilled and frozen varieties.*			

Partnership Food Category and definition	Inclusions	Exclusions	Nutrient target (maximum)
8.1 Pizzas with cured meat toppings *Commercially produced pizza dough, with cured-meat toppings (may also include vegetable, cheese, uncured meat, fish or alternatives toppings) which only requires cooking or re-heating (i.e. no construction). Pizzas without cured meat toppings (as defined in 9.2) are excluded. Includes chilled and frozen varieties.*	All fresh and frozen pizzas, calzones, pizza pockets with cured meat toppings (e.g., ham, pepperoni). Can be slices or whole.	All pizzas without cured meat toppings (see category 982). Pastry-based dishes. Pizza toppings. Pizza-flavoured foods (e.g. pastries, biscuits). Pizzas from takeaway or fast-food restaurants. Leavened bread and rolls with pizza-like toppings (see category 1.3).	**Sodium** 550mg per 100g **Saturated fat** 4g per 100g
8.2 Pizzas with all other toppings *Commercially produced pizza dough with toppings (vegetable, cheese, uncured meat, fish or alternatives) which only requires cooking or re-heating (i.e. no construction). Pizzas with cured meat toppings (as defined in 9.1) are excluded. Includes chilled and frozen varieties.*	All fresh and frozen pizza, calzones, pizza pockets, without cured meat toppings (e.g., chicken, beef, fish, margherita). Can be slices or whole.	All pizzas with cured meat toppings (see category 8.1). Pastry-based dishes. Pizza toppings. Pizza-flavoured foods (e.g. pastries, biscuits). Pizzas from takeaway or fast-food restaurants. Leavened bread and rolls with pizza-like toppings (see category 1.3).	**Sodium** 450mg per 100g **Saturated fat** 4g per 100g
9. Processed meat ***Meat and poultry preserved by smoking, curing, salting or chemical preservatives. Meat product contains no less than 300g/kg meat, where meat either singly or in combination with other ingredients or additives, has undergone a method of processing other than boning, slicing, dicing, mincing or freezing, and includes manufactured meat and cured and/or dried meat flesh in whole cuts or pieces.***			
9.1 Ham *Cured pork product generally containing pork, starch, salt, mineral salts, sugar, antioxidant, sodium nitrate, spices and water. Includes all fat varieties.*	Packaged or deli ham, including leg ham, shaved ham, lite ham, and flavoured varieties (e.g. honey ham).	Sausages, fresh ham – raw, uncured, requiring cooking, 'Protected Designation of Origin' (e.g. Champagne ham, prosciutto, some pancetta's), traditional speciality guaranteed products (e.g. Parma ham), speciality products produced using traditional methods such as immersion and dry cured processes (e.g. cured tongue), canned processed meats (e.g. spam), vegetarian/ vegan alternatives, bacon (see category 9.2), processed deli meats (see category 9.3), Frankfurts and saveloys (see category 9.4).	**Sodium** 1005mg per 100g

Partnership Food Category and definition	Inclusions	Exclusions	Nutrient target (maximum)
9.2 Bacon *Cured and smoked pork product generally containing meat, sugar, mineral salts, antioxidant, nitrite and water. Includes all fat varieties.*	Packaged or deli bacon sold in all forms (e.g. rashers, diced). Includes all types of injection cured bacon (e.g. sliced back, streaky, bacon joints)	Dry and immersion cured pancetta and bacon, ham, 'Protected Designation of Origin', traditional speciality guaranteed products, speciality products produced using traditional methods, sausages, canned processed meats, turkey bacon, chicken bacon, ham (see category 9.1), vegetarian/ vegan alternatives, processed deli meats (see category 9.3), Frankfurts and saveloys (see category 9.4).	**Sodium** 1005mg per 100g
9.3 Processed deli meat *Processed and/or reformed meat products including whole muscle meats (containing pork, beef, or chicken) with added ingredients such as starch, salt, cereal, sugar, spices, flavour, sodium nitrite/nitrate, preservatives and water. Products are typically served cold and often sliced or diced. Includes emulsified luncheon meats.*	Devon, fritz, chicken loaf, mortadella, pastrami, chicken rolls, Berliner, whole muscle corned beef (e.g. silverside) and other processed whole muscle meats (e.g. chicken pieces, shaved chicken, turkey or beef, if in alignment with subcategory definition).	Sausages sold raw, ham (see category 9.1), bacon (see category 9.2), twiggy sticks, kabana, salami, mettwurst canned meats, meat paste, vegetarian/vegan alternatives, pate, cooked uncured meats (e.g. roast meats), dried meats, fermented meats, 'Protected Designation of Origin', traditional speciality guaranteed products and speciality products produced using traditional methods (e.g. immersion and dry cured processes including cured tongue), whole muscle corned beef (e.g. silverside), Frankfurts and saveloys (see category 9.4).	**Sodium** 810mg per 100g
9.4 Frankfurts and saveloys *Frankfurts/Frankfurters, hot dogs and saveloys.*	Frankfurts/Frankfurters, hot dogs and saveloys.	Ham, bacon, processed deli meats, canned processed meats, kabana, kransky, Polish sausage, fresh sausages, vegetarian/vegan alternatives, sausage rolls, coated processed meats and meats in pastry or bread.	**Sodium** 900mg per 100g **Saturated fat** 10% reduction across products with saturated fat levels exceeding 6.5g per 100g
10. Ready meals ***Meals sold as ready-to-eat. May require re-heating or added accompaniments (e.g. potato, rice, noodles, pasta). Includes chilled and frozen varieties.***			

Partnership Food Category and definition	Inclusions	Exclusions	Nutrient target (maximum)
10.1 Ready meals *Meals sold as ready-to-eat. May require re-heating or added accompaniments (e.g. potato, rice, noodles, pasta). Includes chilled and frozen varieties.*	Frozen, fresh or chilled plated complete meals of all cuisines made from meat, poultry, fish, Quorn, tofu or vegetables (e.g. frozen lasagne, frozen risotto, fresh pastas with sauces, butter chicken with rice, vegetable curries, dhal). Shelf-stable rice/pasta with meat/poultry/ ~~fish~~/ vegetables and/or sauce served as a meal. Canned meals with meat or alternative (e.g. canned Irish stew, beef stroganoff) and other dishes that can be consumed as a meal and do not require preparation.	Meals requiring reconstitution (powdered or dry sachets). kit meals (e.g. taco kits, sushi kits) and any meals requiring the addition of fresh ingredients (e.g. vegetables, meat, meat alternatives). Soups (see category 16.1). Pizzas (see categories 8.1 and 8.2). Dishes requiring preparation (e.g. 2 Minute Noodles). Salads (sold as a side dish or bagged mix of salad ingredients (e.g. potato salad) and sold as a complete meal e.g. chicken caesar salad with croutons). Shelf-stable rice/pasta with fish and/or sauce served as a meal.	**Sodium** 250mg per 100g
~~Gravies and~~ Sauces ***~~This category includes products intended to complement or enhance a meal, either during cooking or at the point of serving.~~*** ***Any sauces, used for multiple cooking purposes, which could be considered in two reformulation categories, should be classified in line with the on-pack imagery, preparation instructions and in-store placement.*** ***~~Target is per 100g/ml of product for ready to serve sauces; and per 100g/ml of dry or condensed sauce that has been made up / diluted in accordance with the on-pack instructions.~~ If the sauce nutrition information is expressed as per 100mL, apply the product's specific gravity value to convert the nutrition information from millilitres to grams, to enable comparison to the per 100g nutrient target.***			
11.1 Gravies and finishing sauces *Gravies and finishing sauce products which are designed to be served over food upon serving or as it finishes cooking.*	Ready-to-serve liquid gravies, powdered gravies, sauces used in cooking and positioned as a finishing sauce to be served over the food upon serving or as it finishes cooking (e.g. red wine sauce, mushroom sauce, white sauce, cheese sauce and Hollandaise sauce). Includes both shelf stable and chilled varieties.	Salad dressings, mayonnaises, béarnaise and hollandaise sauces if positioned for use as a condiment (used in small amount to augment a food). Mustards, pesto (see category 11.2), tomato paste, passata, condiment style sauces (e.g. tomato, barbeque, hoisin and sweet chilli sauces), ready meals containing gravies or finishing sauces and stocks (e.g. vegetable or chicken stock), curry pastes (see category 11.5), rubs, marinades, Asian-style and other savoury sauces (see categories 6.4 and 11.5). Condiment sauces in meal kits (e.g. taco salsa). Recipe bases / meal base concentrates, dry flavouring sachets.	**Sodium** 450mg per 100g Target is per 100g/ml of product for ready to serve gravies; and per 100g/ml of dry or condensed gravy that has been made up / diluted in accordance with the on-pack instructions.

Partnership Food Category and definition	Inclusions	Exclusions	Nutrient target (maximum)
11.2 Pesto *A sauce traditionally made with basil, garlic, pine nuts or other nuts, olive oil, parmesan or similar cheeses, and salt. May include other herbs and/or vegetables and flavourings, and is a major characterising component of a meal and designed to be added to foods during preparation, rather than at the table. Includes both shelf stable and chilled varieties.*	Pesto used during cooking or intended as stir-through (e.g. basil pesto, sundried tomato pesto, olive pesto). Includes both shelf stable and chilled varieties	All other sauces, condiments or flavourings, ready meals containing pesto, pesto marketed as a dip and pesto sauces marketed as a pasta sauce (e.g. stir-through pesto pasta sauce), finishing sauces and condiments.	**Sodium** 720mg per 100g
11.3 Asian-style simmer sauces *Simmer-style sauces based on replicating Asian flavours, often based on high sodium sauces such as soy, fish or oyster sauce and/or labelled as noodle sauce or stir-fry sauce, which are major characterising components of a meal. Designed to be added to foods during preparation, rather than at the table. Includes both shelf stable and chilled varieties. Products within this category do not require reconstitution or the addition of liquids such as tomato-based sauces or pastes, cream, coconut milk or stock.*	Sauces used during cooking (e.g. stir-fry sauces, simmer sauce, meal bases, recipe bases) where typically the whole jar, pouch or tub is used and only require the addition of meat and/or vegetables. Includes both shelf stable and chilled varieties.	Sauces and condiments designed to be added at the table (e.g. wasabi, chilli sauce, sweet chilli sauce, soy sauce, fish sauce, oyster sauce, Worcestershire sauce). Gravies and finishing sauces (see category 11.1). Curry pastes, marinades designed to be used in small amounts (see category 11.5 Thick pastes and sauces). Pasta sauces, Indian sauces, casserole and non-Asian rice sauces (see category 11.4 Other savoury sauces). Recipe concentrates or meal base powders / sachets, rubs.	**Sodium** 680mg per 100g
11.4 Pasta, Indian-style and other cooking sauces *All Pasta, Indian-style and other cooking sauces that are major characterising components of a meal. Designed to be added to foods during preparation, rather than at the table. Includes both shelf stable and chilled varieties. Products within this category do not require reconstitution or the addition of liquids such as tomato-based sauces or pastes, cream, coconut milk or stock.*	Cooking sauces (liquid), casserole sauces, pasta sauces (including pesto pasta sauce), pasta and risotto bakes, Indian curry sauces (e.g. butter chicken) and other rice, pasta or noodle sauces used in cooking. Can be pour-in, stir-in, cook-in, simmer-in or stir-thru (e.g. stir-fry, casserole, ragout, goulash, curry sauces in liquid form). May include Asian-style simmer sauces without high sodium additions. Includes both shelf stable and chilled varieties.	Gravies and finishing sauces (see category 11.1). Pesto (see category 11.2). Asian-style simmer sauces (see category 11.3). Tomato paste, curry paste, herbs, spices, condiments (e.g. pickles, relishes), tomato sauce, BBQ sauce, recipe concentrates or meal base powders / sachets, rubs, marinades.	**Sodium** 360mg per 100g

Partnership Food Category and definition	Inclusions	Exclusions	Nutrient target (maximum)
11.5 Thick pastes and sauces *Thick pastes and sauces used in very small quantities per serve (e.g. 20-30g) such as curry and Thai. Products within this category may require the addition of liquids such as tomato-based sauces, cream, or coconut milk.*	Thick pastes and sauces (incl. marinades) used in very small quantities (e.g. 20-30g/serve).	Gravies and finishing sauces (see category 11.1). Pesto (see category 11.2). Asian-style simmer sauces (see category 11.3). Pasta sauces, Indian sauces, casserole and non-Asian rice sauces (see category 11.4 Other savoury sauces). Recipe concentrates or meal base powders / sachets.	**Sodium** 2000mg per 100g
12. Sausages ***Minced meat, poultry or a combination of meat and poultry, encased in a skin, sold raw and requiring cooking before eating. Product must contain no less than 500g/kg of fat free meat flesh; and have a proportion of fat that is no more than 500g/kg of the fat free meat flesh content.***			
12.1 Sausages: Chicken/Pork *Minced chicken and/or pork, encased in a skin, sold raw and requiring cooking before eating. Product must contain no less than 500g/kg of fat free meat flesh; and have a proportion of fat that is no more than 500g/kg of the fat free meat flesh content.*	Fresh, chilled and frozen sausages and chipolatas, sold in raw form, made from (predominately) chicken or pork. Product categorisation should be determined based on the species contributing the highest proportion of meat/poultry content in the product.	Sausages made from (predominately) beef, lamb or veal (see category 12.2). Rissoles, burger patties, crumbed or battered meats, vegetarian/ vegan alternatives, sausage rolls, ham, bacon, deli meats, frankfurts, saveloys, hot dogs and other pre-cooked sausages, sausage meat products (e.g. stuffing, turkey roll or chicken roll).	**Sodium** 540mg per 100g **Saturated fat** 6g per 100g
12.2 Sausages: Beef/Lamb/Veal *Minced meat (beef/lamb/veal) encased in a skin, sold raw and requiring cooking before eating. Product must contain no less than 500g/kg of fat free meat flesh; and have a proportion of fat that is no more than 500g/kg of the fat free meat flesh content.*	Fresh, chilled and frozen sausages, boerewors and chevapchichi, sold in raw form, made from (predominately) beef, lamb or veal. Product categorisation should be determined based on the species contributing the highest proportion of meat content in the product.	Sausages made from (predominately) chicken or pork (see category 12.1). Rissoles, burger patties, crumbed or battered meats, vegetarian/ vegan alternatives, sausage rolls, ham, bacon, deli meats, frankfurts, saveloys, hot dogs and other pre-cooked sausages, sausage meat products (e.g. stuffing, turkey roll or chicken roll).	**Sodium** 540mg per 100g **Saturated fat** 8.5g per 100g
13. Savoury and sweet biscuits ***Biscuits, crackers or cakes which are shelf-stable and ready-to-eat.***			
13.1 Plain savoury crackers and biscuits *Plain, savoury grain-based crackers and biscuits which are shelf-stable and ready-to-eat. Includes pepper varieties, but not those identified as salt flavoured*	Wholemeal/wholegrain/plain crackers and biscuits with a flaky texture (e.g. SAO, Jatz, Savoy), crispbreads (e.g. Ryvita, Cruskits), other varieties (e.g. water/wafer crackers), all with either pepper flavouring (only) or without flavourings. Includes crackers made from any type of flour (e.g. wheat, rice). Plain products seasoned with salt.	Breadsticks, croutons, sweet biscuits, combinations of savoury biscuits/crackers with toppings (e.g. cheese, dip, vegetables, canned seafood), plain or flavoured rice cakes (e.g. SunRice rice cakes), savoury crackers with cheese, salt, or other savoury flavourings. Note: rice crackers that are advertised as 'plain' are also excluded if they contain any added seasoning/flavouring (other than salt).	**Sodium** 630mg per 100g

Partnership Food Category and definition	Inclusions	Exclusions	Nutrient target (maximum)
13.2 Plain corn, rice and other 'grain-cake' biscuits *Plain, savoury corn, quinoa or rice-based cakes which are shelf-stable and ready-to-eat.*	Puffed/ popped grain cakes (grain-varieties listed in definition) without added flavourings (e.g. SunRice rice cakes, Real Foods corn thins, SunRice rice and quinoa cakes). Includes products with salt added as a 'seasoning' sprinkled on top.	Plain or flavoured crackers (e.g. rice crackers, corn-based crackers, flavoured grain-based crackers) and flavoured cakes (e.g. flavoured rice cakes, flavoured corn Thins). Excludes plain and 'unseasoned' rice cakes.	**Sodium** 270mg per 100g
13.3 Flavoured savoury biscuits, crackers and 'grain-cake' biscuits *Flavoured or salted savoury grain-based biscuits, crackers and cakes which are shelf-stable and ready-to-eat*	Savoury crackers with cheese (e.g. Shapes), salt (e.g. rosemary & sea salt, garlic & sea salt crostini, Grissini or other biscuits), or other savoury flavourings. Flavoured rice, corn or other crackers, biscuits (e.g. Country Cheese, Sakata, Delites) and 'grain-cakes' (e.g. flavoured rice cakes, flavoured corn Thins), artisan crackers with dried fruit, nuts, or seeds (e.g. fig and walnut crackers).	Croutons, breadsticks, sweet biscuits, savoury biscuits/crackers with toppings (e.g. cheese, dip, vegetables, canned seafood) and plain puffed/popped 'grain-cakes', plain wholemeal/wholegrain crackers and plain biscuits, plain crispbreads (e.g. Ryvita, Cruskits), other varieties (e.g. water/wafer crackers). Products where salt (alone) is used as a 'seasoning'/ lightly salted products.	**Sodium** 720mg per 100g
13.4 Sweet biscuits *Commercially prepared sweet biscuits, made with or without added flavourings, chocolate, fruit or nuts.*	Includes all filled and unfilled sweet biscuits, whether coated (full or half) or not, wafer biscuits, breakfast biscuits, and mixes for baking. May contain added flavourings, chocolate, confectionary, fruit or nuts.	Savoury biscuits (see categories 13.1, 13.2 or 13.3), cakes, muffins or slices (see category 17.1), single biscuit-making ingredients (e.g. icing, sugar, flour), meringues (including pavlova, macarons), pastry bases (e.g. unfilled short crust pastry, tart shells), crepes, pancakes, pikelets, waffles, sweet buns, scones, pastries (e.g. croissants, Danishes, strudels).	**Sodium** 350 mg per 100g
Savoury pastries ***Meat, poultry and/or vegetable filling encased in a pastry.***			
14.1 Dry pastries *Dry meat, vegetable or dairy filing encased in a pastry.*	Sausage rolls. Meat or vegetable or plant-based meat alternative pasties. Savoury pastries/rolls/triangles (e.g. chicken & vegetable, spinach & cheese, ham & cheese). Quiche. Pastizzi. Includes family size, single-serve and party varieties. Includes gluten-free varieties.	All wet pastries (see category 14.2). Asian pastries (e.g. dumplings, wontons, spring rolls) and filled vol-au-vents. Croissants. Sweet pastries. Pastry cases or bases without fillings (e.g. vol au vent or spring roll wrappers). Frittatas.	**Sodium** 500mg per 100g **Saturated fat** 8g per 100g

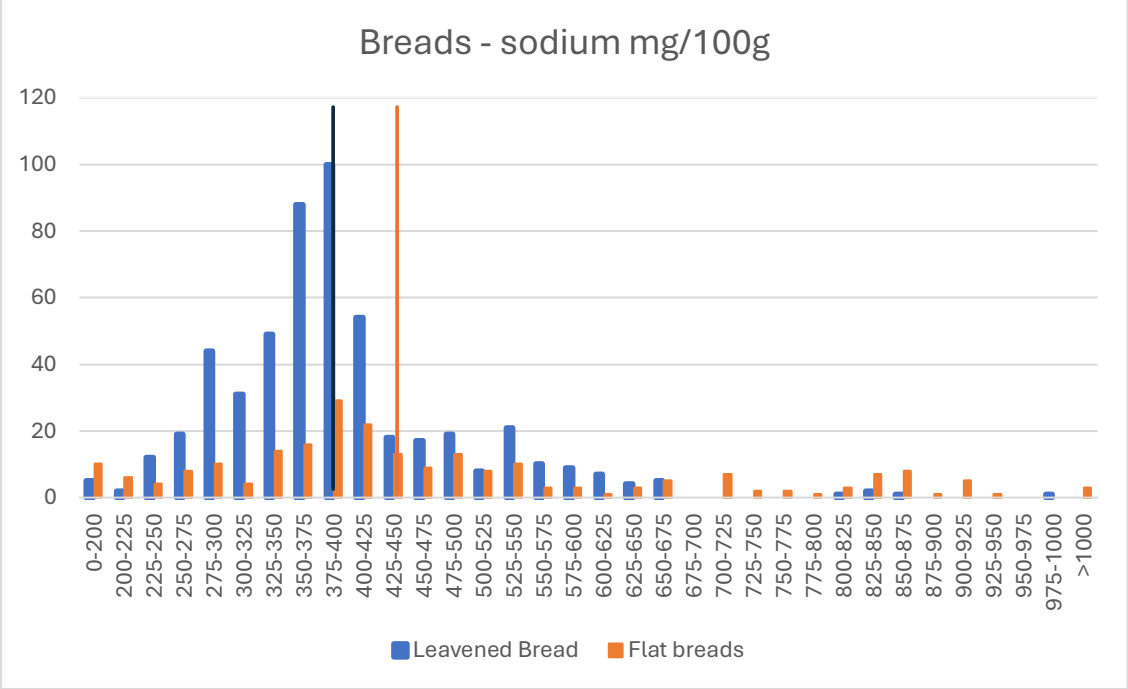
Partnership Food Category and definition	Inclusions	Exclusions	Nutrient target (maximum)
14.2 Wet pastries *Wet meat, vegetable or dairy filing encased in a pastry.*	Meat or vegetarian pies (in a gravy base, all flavours), includes gluten-free varieties.	All dry pastries (see category 14.1). Pizzas, calzones, and pizza pockets. Pastry cases or bases without fillings (e.g. vol-au-vent or spring roll wrappers). Sweet pastries. Pies without pastry (e.g. cottage pie)	**Sodium** 400mg per 100g **Saturated fat** 7g per 100g
Savoury snacks ***Potato-, corn-, vegetable-, grain-based shelf-stable, ready-to-eat snacks sold in portioned or bulk packaging with or without flavouring.***			
15.1 Potato and other vegetable chips *Thin slices of potato or other vegetable that are generally deep fried, and then flavoured (e.g. using salts, seasonings, herbs or spices), ready-to-eat snacks. Excludes salt and vinegar flavours.*	All standard chips (sliced potato or vegetable only), all flavours except salt and vinegar (see category 15.2). Includes thick, thin, crinkle, and deli-style.	Salt and vinegar flavoured varieties (see category 15.2). Extruded and pelleted snacks (see category 15.3). Sheeted and reformed snacks (see category 15.4). Popcorn (see category 15.5).	**Sodium** 500mg per 100g
15.2 Salt and vinegar snacks *All snack products salt & vinegar flavoured and sold as ready-to-eat. Includes potato-, corn-, rice-, vegetable-based snacks.*	Potato-, corn-, vegetable-, grain-based snacks flavoured with salt and vinegar flavouring. Includes popcorn.	All non-salt and vinegar flavoured snacks (e.g. potato crisps, processed flavoured snacks, corn chips, popcorn, vegetable- or legume-based snacks).	**Sodium** 740mg per 100g
15.3 Extruded and pelleted snacks *Starch-rich materials (e.g. corn, maize, wheat, rice, potato flour) or legume flours that are generally transformed into "hot melt fluids" and then expanded or puffed via an extruder to form a ready-to-eat snack.*	Processed flavoured snacks (e.g. Cheese Puffs, Bacon Balls, Twisties, Burger Rings, Cheezels, rice wheels, soya crisps, pork rind snacks, prawn crackers) produced via extruded or pelleting processes.	Salt and vinegar flavoured varieties (see category 15.2), Potato and other vegetable chips (see category 15.1), Sheeted and reformed snacks (see category 15.4), Popcorn (see category 15.5), P pretzels.	**Sodium** 810mg per 100g
15.4 Sheeted and reformed snacks Starch-rich materials (e.g. corn, maize, wheat, rice, potato flour) or legume flours used to make a dough, which is then reformed or sheeted to thin, uniform dimensions and cut to form the snack and fried or baked. Sold as ready-to-eat.	Processed flavoured snacks (e.g. corn chips, pringles), produced via sheeting or reforming processes.	Salt and vinegar flavoured varieties (see category 15.2), Extruded and pelleted snacks (see category 15.3), Potato and other vegetable chips (see category 15.1), Popcorn (see category 15.5), Plain savoury crackers and biscuits (see category 13.1), Plain corn, rice and other 'grain-cake' biscuits (see category 13.2), Flavoured savoury biscuits, crackers and 'grain-cake' biscuits (see category 13.3), pretzels.	**Sodium** 520mg per 100g

Partnership Food Category and definition	Inclusions	Exclusions	Nutrient target (maximum)
15.5 Popcorn *Corn or maize kernels that have been heated until they burst open and puff out.*	Popcorn, all flavours except salt and vinegar. Includes microwave varieties.	No added salt varieties, Salt and vinegar flavoured varieties (see category 15.2), Potato and other vegetable chips (see category 15.1), Extruded and pelleted snacks (see category 15.3), Sheeted and reformed snacks (see category 15.4).	**Sodium** 360mg per 100g
Soups ***Savoury, primarily liquid dish, containing meat, poultry, fish, vegetables or other ingredients in stock or water. May be chilled or shelf-stable, ready for consumption or requiring reconstitution.***			
16.1 Soups *Chilled soups, ready-to-eat soups, frozen soups, dry packet soup mixes requiring reconstitution and canned soups.* *Target is per 100g of product for ready to serve soups; and per 100g of dry or condensed soups that have been made up / diluted in accordance with the on-pack instructions.*	Chilled soups, ready-to-eat soups, frozen soups, dry packet soup mixes requiring reconstitution and canned soups.	Products designed to be added to soup (e.g. lentil soup mix, soup beans, pasta or noodles for soups, canned or fresh meats for use in soups, e.g. beef soup bones).	**Sodium** 280mg per 100g Upper limit 300mg per 100g
Sweet bakery ***Freshly baked, frozen, shelf-stable or baking mixes of cakes, muffins and slices.***			
17.1 Cakes, muffins and slices *Freshly baked, frozen, shelf-stable or baking mixes of cakes, muffins and slices.*	All cakes, lamingtons, cupcakes, cake-type slices (e.g. chocolate brownies), biscuit-type slices (e.g. hedgehogs, caramel slice), cake rolls (e.g. Swiss rolls), muffins and muffin bars, cake mixes, muffin mixes and slice mixes.	Meringues (including pavlova, macarons), pastry bases (e.g. short crust pastry, tart shells), crepes, pancakes, pikelets, waffles, single cake-making ingredients (e.g. icing, sugar, flour), sweet buns (e.g. finger buns, fruit buns, fruit loaves, cinnamon scrolls), scones, pastries (e.g. croissants, Danishes, strudels), sweet biscuits (see 13.4), fruit pies, cheesecake, tarts, crumbles, doughnuts, profiteroles, flour-based puddings (e.g. sticky date pudding), eclairs.	**Sodium** 360mg per 100g
Sweetened yoghurt ***Sweetened dairy-based or dairy-alternative yoghurts, liquid or semi-solid.***			

Partnership Food Category and definition	Inclusions	Exclusions	Nutrient target (maximum)
18.1 Sweetened yoghurt: Mammalian ~~*Sweetened dairy-based yoghurts, liquid or semi-solid.*~~ *Liquid and semi-solid sweetened and/or flavoured yoghurt, excluding plain yoghurts with no added kilojoule-containing sweeteners or flavouring.*	Sweetened yoghurts made with dairy milk (with added sugar, honey, juice concentrate or other kilojoule-containing sweetener) with or without non-nutritive sweetener, added cereals/grains, nuts, fibre, vitamins and minerals or confectionary. Yoghurt drinks, probiotic drinks, fermented milk (milk kefir). Includes yoghurts sold in pots, pouches and bottles.	Yoghurts made with milk alternatives (see category 18.2). Custards, dairy and dairy alternative desserts (including frozen products). Fromage frais (e.g. Fruche). Plain/Greek-style and other unsweetened or non-nutritive sweetened yoghurts. No added sugar products with non-nutritive sweeteners. No-added-sugar products with fruit. ~~with no added sugar, honey, juice concentrate, or other kilojoule-containing sweetener~~ Liquid fermented milk drinks (milk kefir).	**Sugar** 11.5g per 100g Upper limit 16g per 100g
18.2 Sweetened yoghurt: Dairy alternatives *Sweetened yoghurt made from non-dairy ingredients, liquid or semi-solid.*	Sweetened yoghurts made with plant-based ingredients (e.g. coconut, soy, grains, rice, oats, nuts) and cultures (with added sugar, honey, juice concentrate or other kilojoule-containing sweetener). Includes plant-based kefir and drinking yoghurts. Includes yoghurts sold in pots, pouches and bottles.	Sweetened mammalian yoghurts (see category 18.1). Non-nutritive sweetened yoghurts with no added sugar, honey, juice concentrate, or other kilojoule-containing sweetener (may contain unconcentrated fruit for flavouring). Puddings (including rice pudding) and other non-dairy desserts (e.g. chia pots, custards, sweetened non-yoghurt desserts, frozen yoghurts), ice-creams/ice desserts, products without cultures.	**Sugar** 7g per 100g

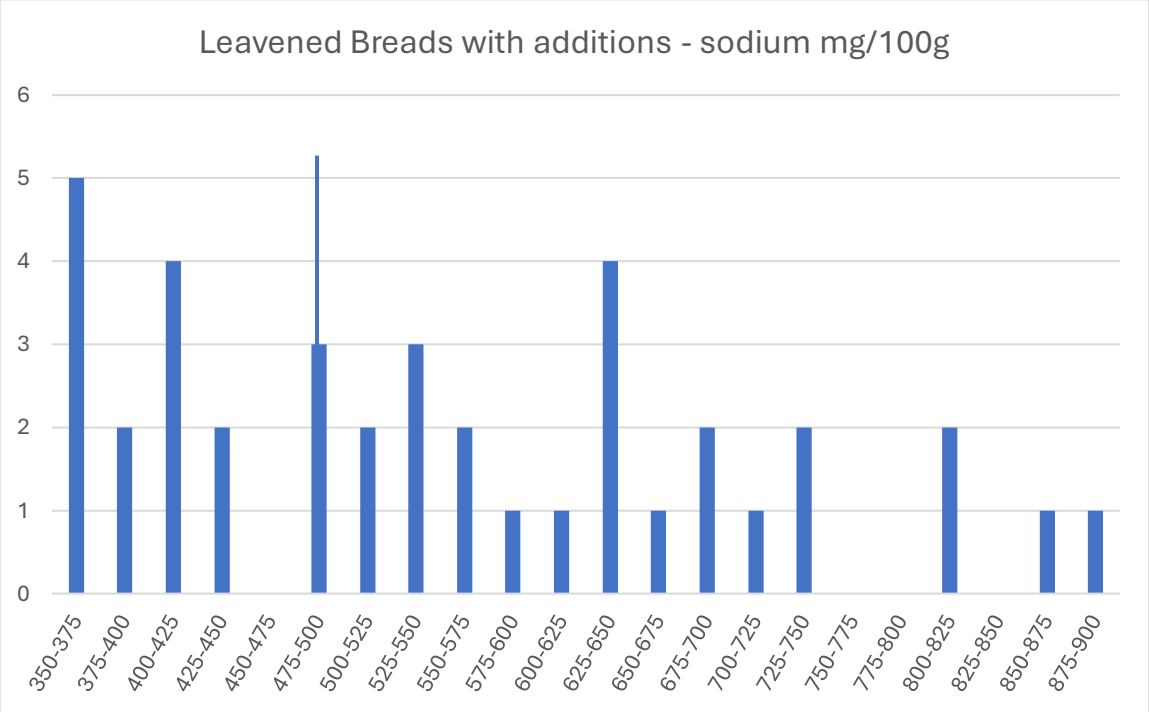
Appendix 2 - Histograms

1.0 Bread - sodium (n=758)



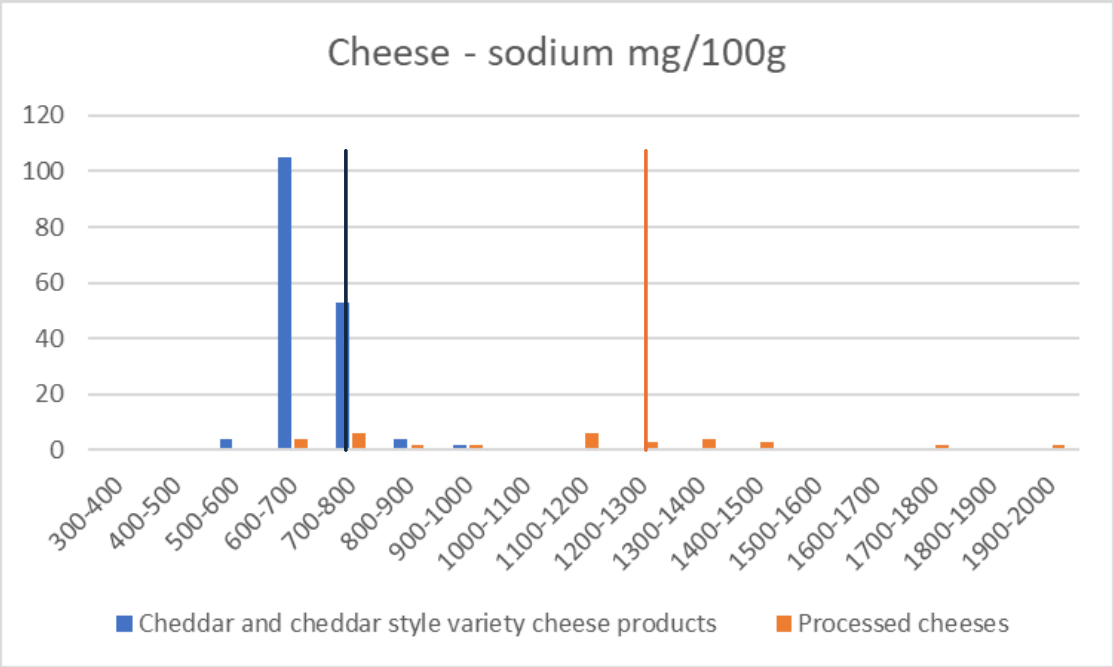
The targets for *Leavened bread* and *Flat bread* will be maintained at 380mg/100g and 450mg/100g respectively. These targets are depicted by a thin line on the graph as per graph legend.

1.3 Bread - Leavened breads with additions - sodium (n=39)



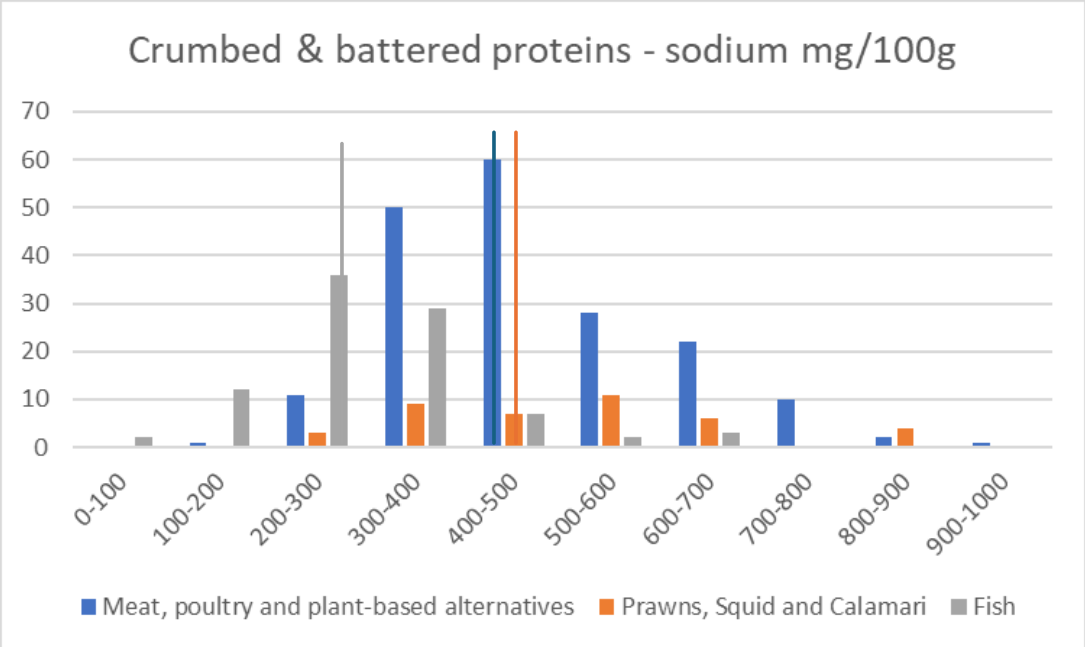
The recommended sodium target for *Leavened breads with additions* is 480mg/100g. This target is depicted by a thin line on the graph.

3.0 Cheese - sodium (n=170)



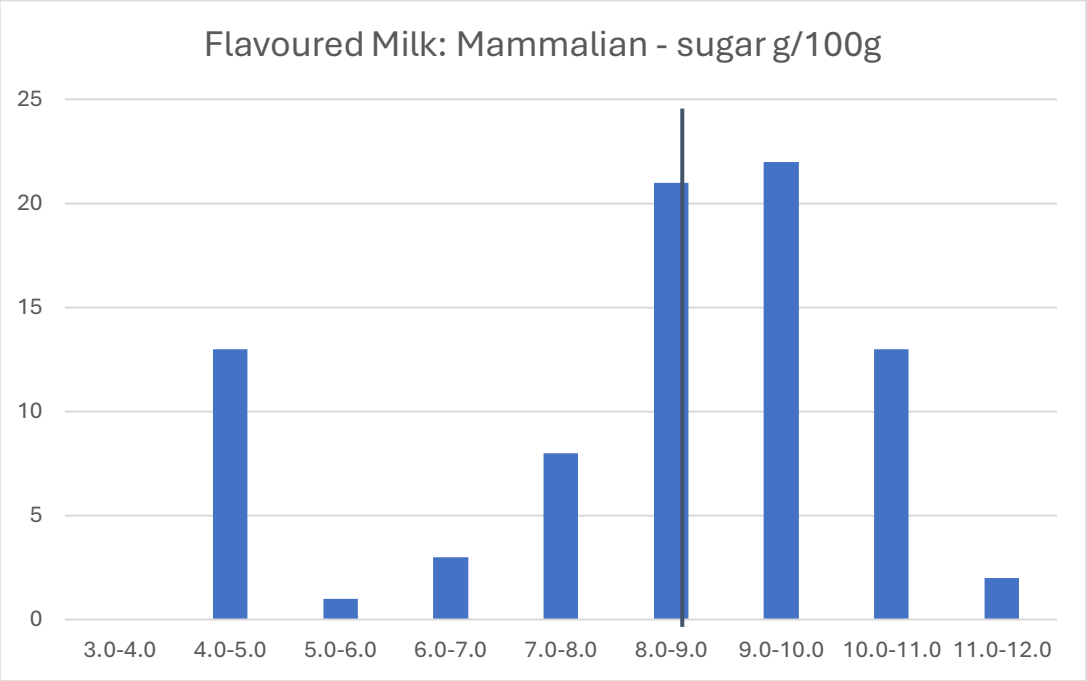
The sodium targets for the cheese categories were maintained: *Cheddar and cheddar-style variety cheese products* (710mg/100g), *Processed cheeses* (1270mg/100g). These targets are depicted by thin lines on the graph as per graph legend.

4.0 Crumbed and battered proteins - sodium (n=316)



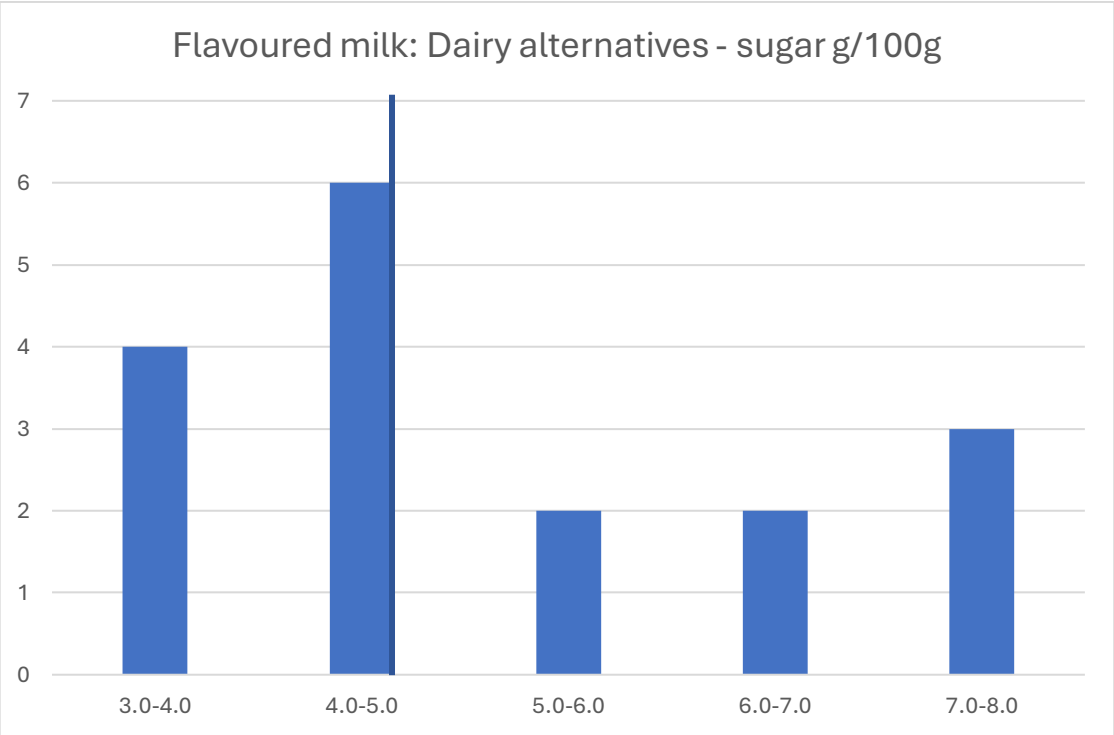
The sodium targets for the crumbed and battered protein categories were maintained, with an update to the category name and definition for *Meat, poultry and plant-based alternatives* (previously *Meat and poultry*): *Meat, poultry and plant-based alternatives* (450mg/100g), *Prawns, squid and calamari* (470mg/100g) and *Fish* (270mg/100g). These targets are depicted by thin lines on the graph as per graph legend.

5.1 Flavoured Milk: Mammalian – sugar (n=83)



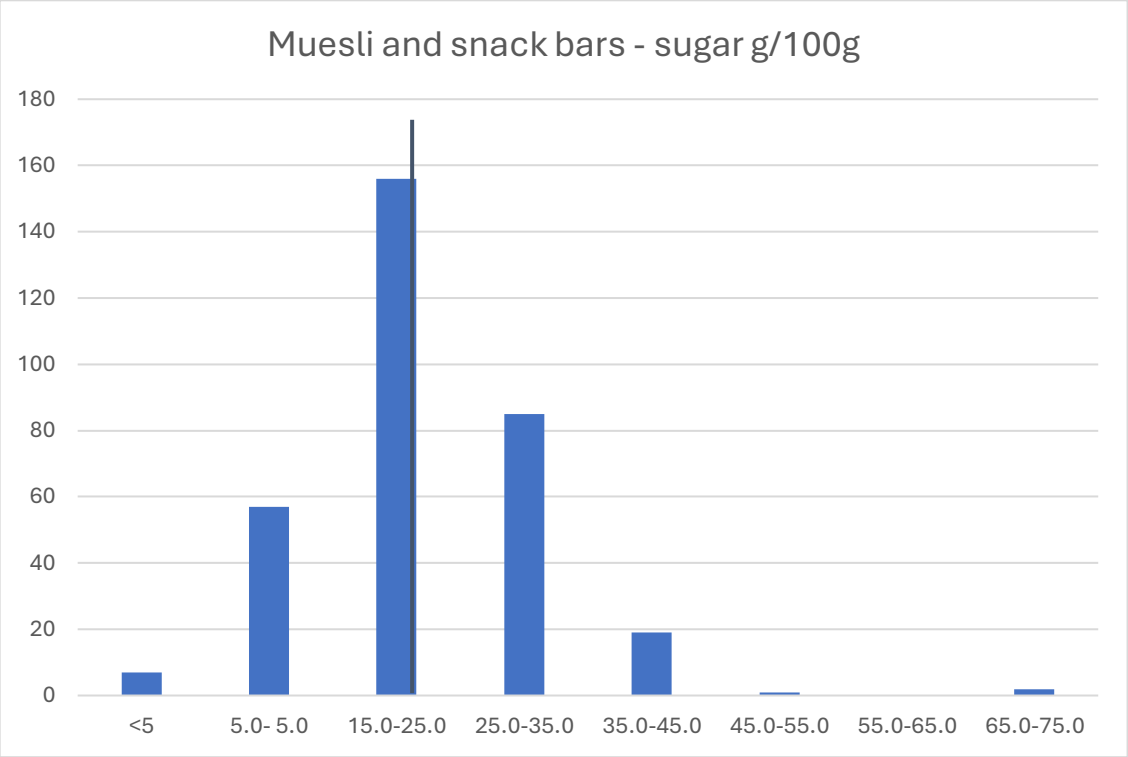
The sugar target for the *Flavoured Milk: Mammalian* category was maintained at 9g/100g. This target is depicted by a thin line on the graph.

5.2 Flavoured Milk: Dairy Alternatives – sugar (n=17)



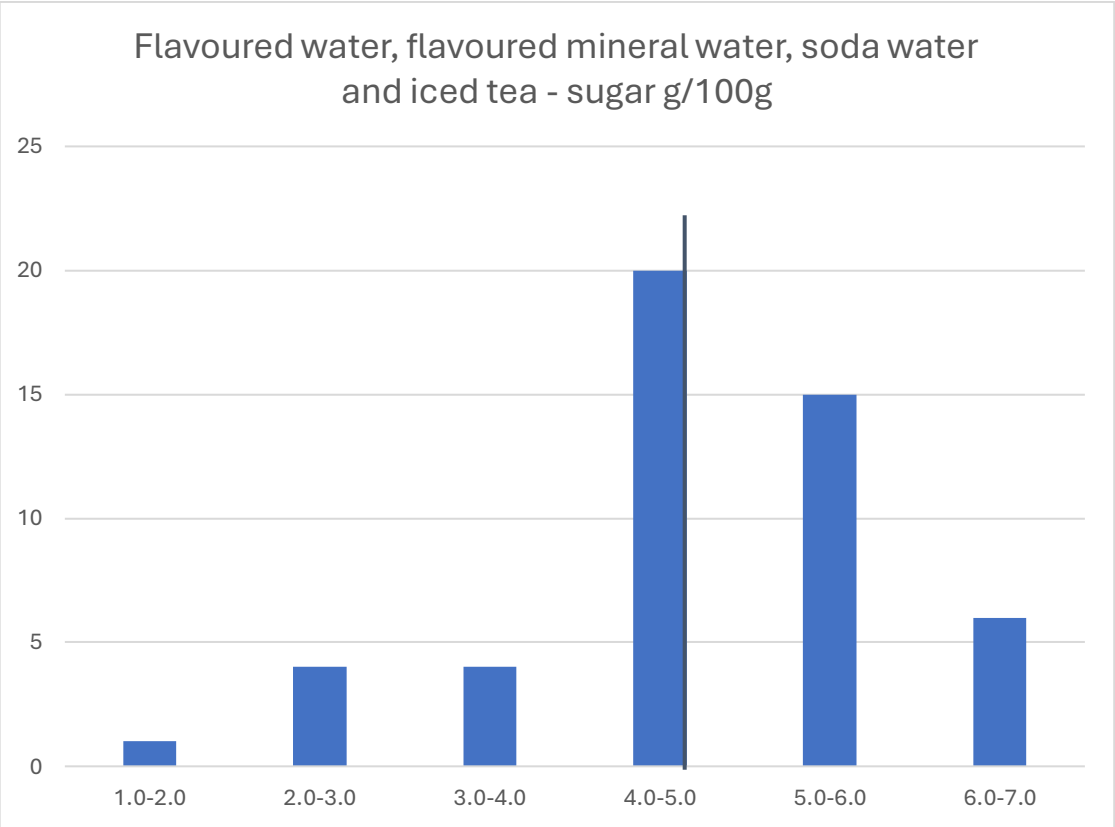
The sugar target for the *Flavoured Milk: Dairy Alternatives* category was maintained at 5g/100g. This target is depicted by a thin line on the graph.

6.0 Muesli and Snack Bars – sugar (n=327)



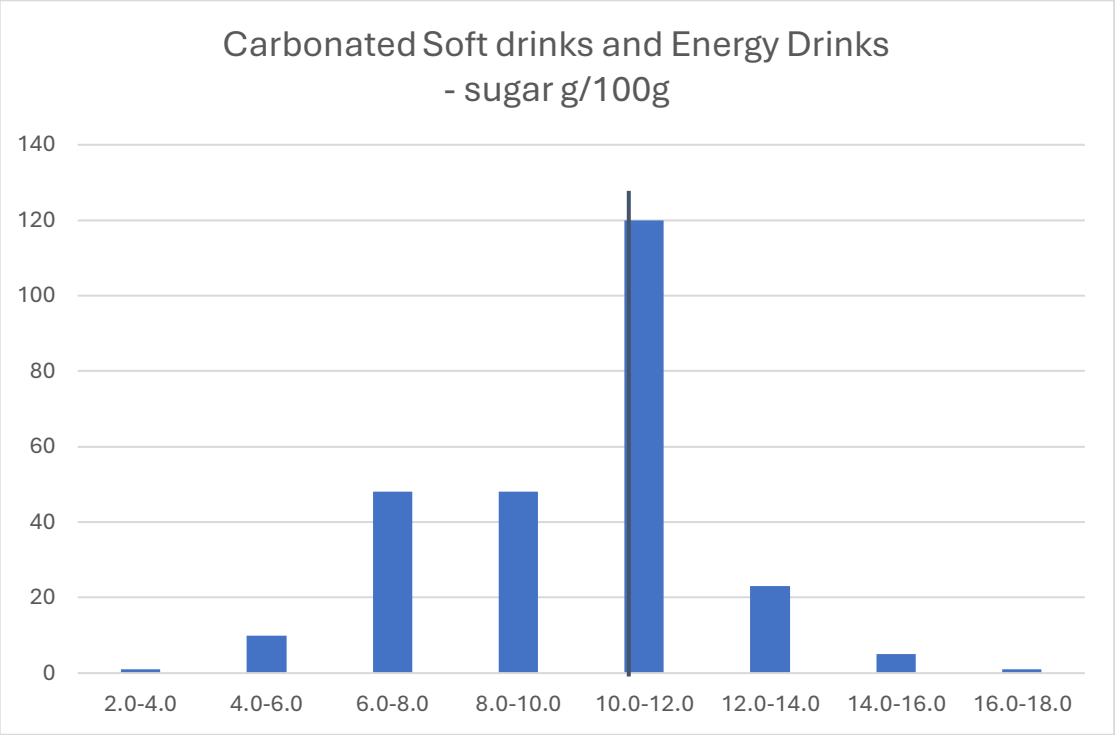
The sugar target for the *Muesli and Snack Bars* category was maintained at 25g/100g (or at least a 15% reduction for products containing over 28.5g/100g). The fixed target is depicted by a thin line on the graph.

7.1 Flavoured water, flavoured mineral water, soda water and iced tea – sugar (n=50)



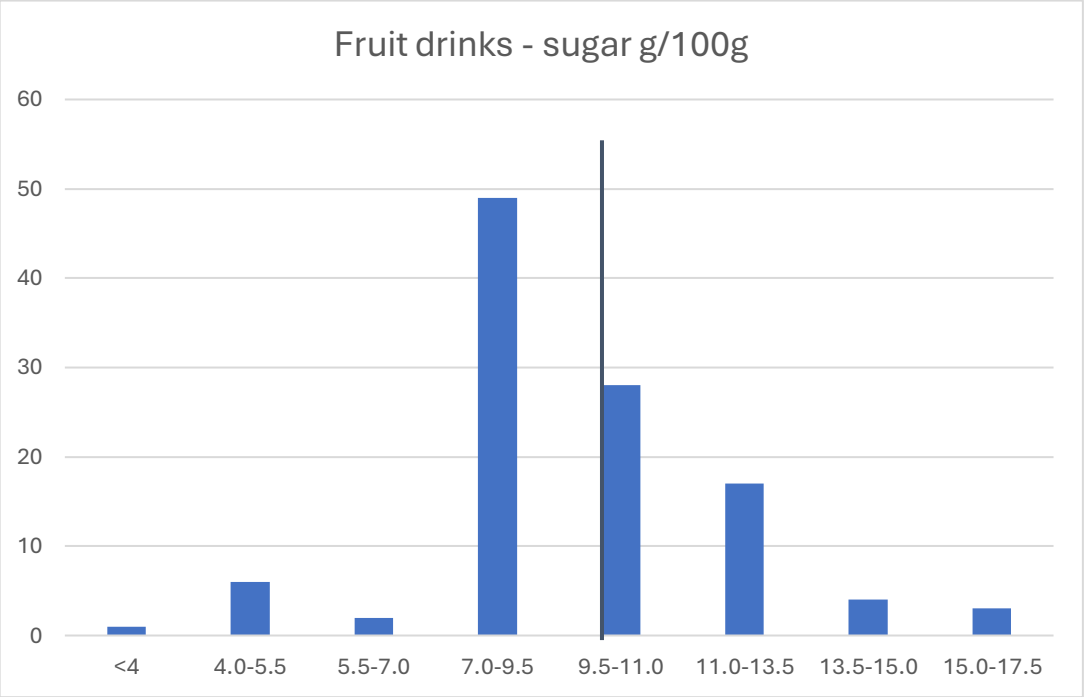
The sugar target for the *Flavoured water, flavoured mineral water, soda water and iced tea* category was maintained at 5g/100g. This target is depicted by a thin line on the graph.

7.2 Carbonated Soft drinks and Energy Drinks– sugar (n=256)



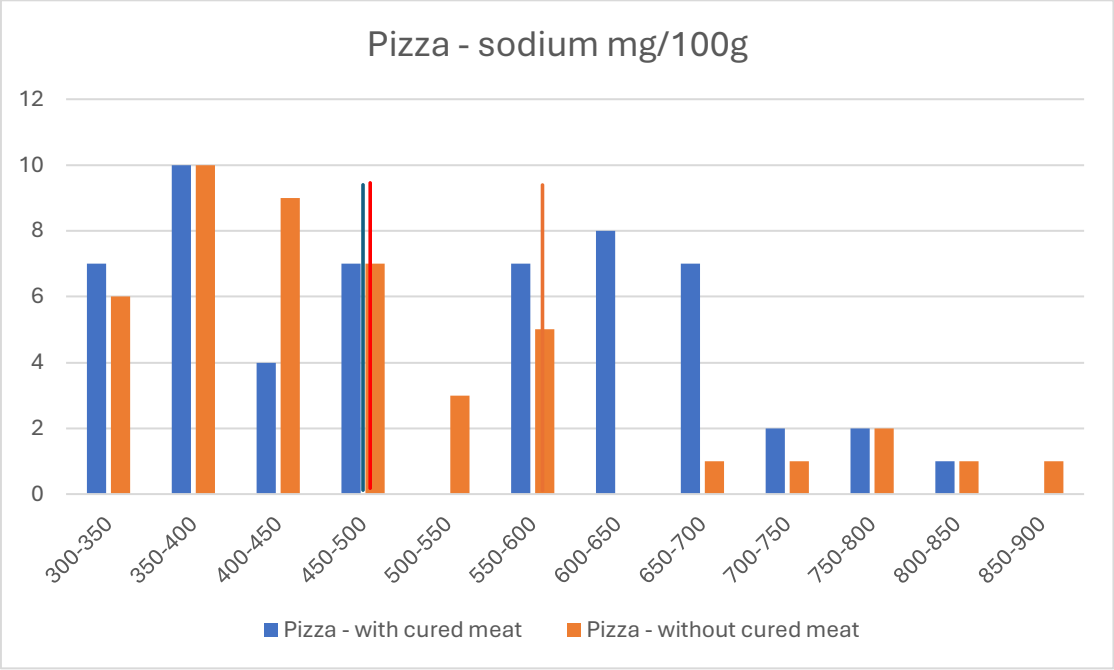
The sugar target for the *Carbonated Soft drinks and Energy Drinks* category was maintained at a 10% reduction in sugar for defined products above 10g. A fixed target of 10g/100g is depicted by a thin line on the graph.

7.3 Fruit drinks– sugar (n=110)



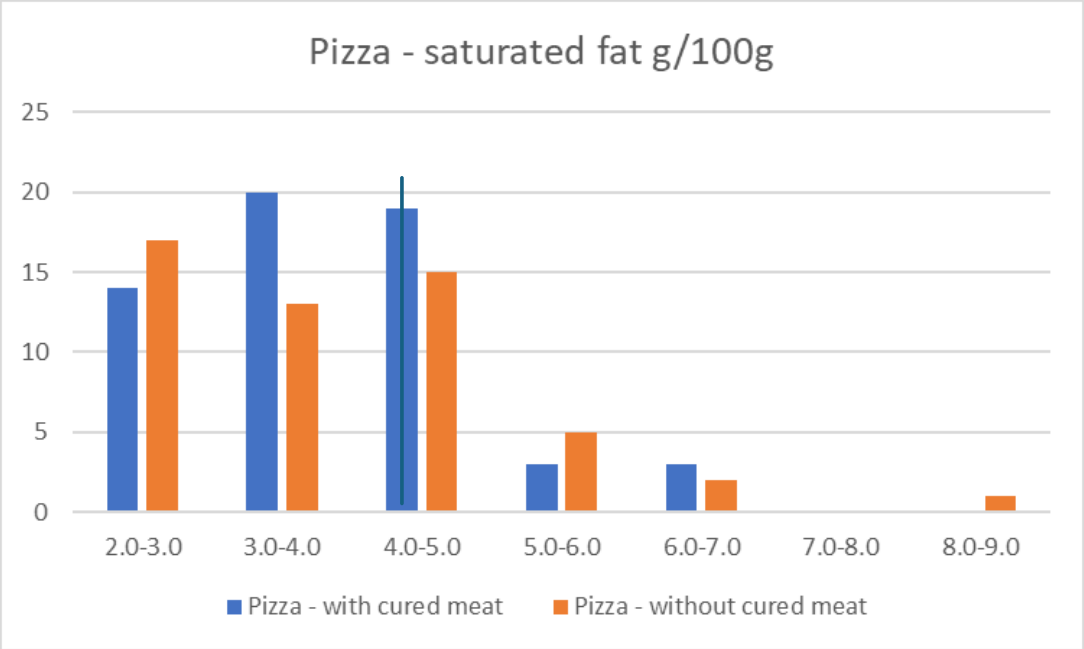
The sugar target for the *Fruit drinks* category was maintained at 9.5g/100g. This target is depicted by a thin line on the graph.

8.0 Pizza - sodium (n=112)



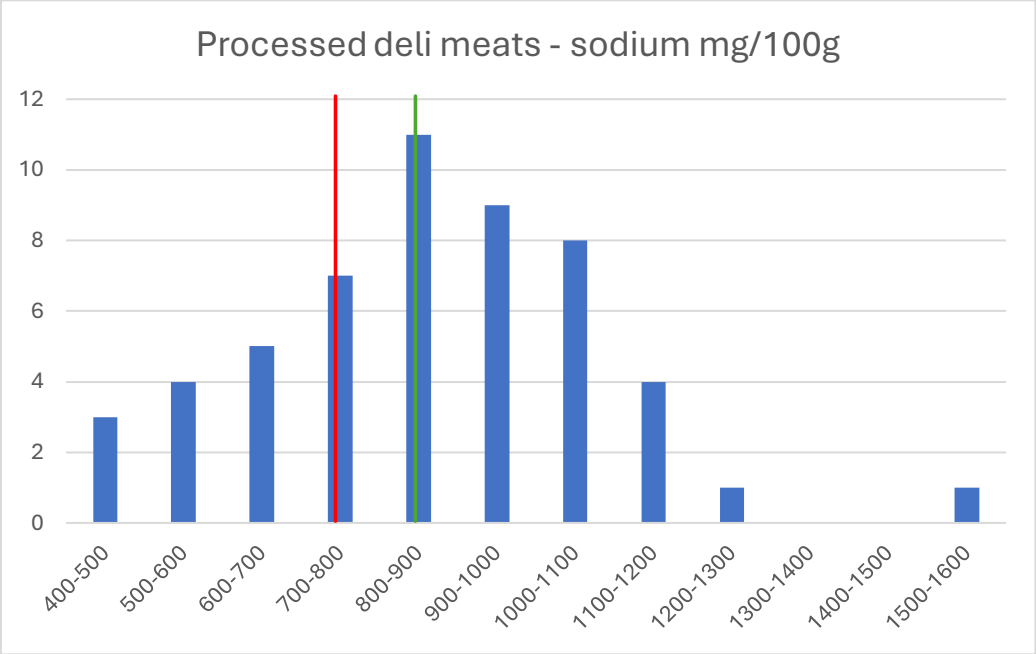
Current sodium target (450mg/100g) depicted by red line, proposed targets for *Pizza with cured meat topppings* (550mg/100g) and *Pizza – all other varieties* (450mg/100g) shown with thin line as per legend on the graph.

8.0 Pizza - saturated fat (n=112)



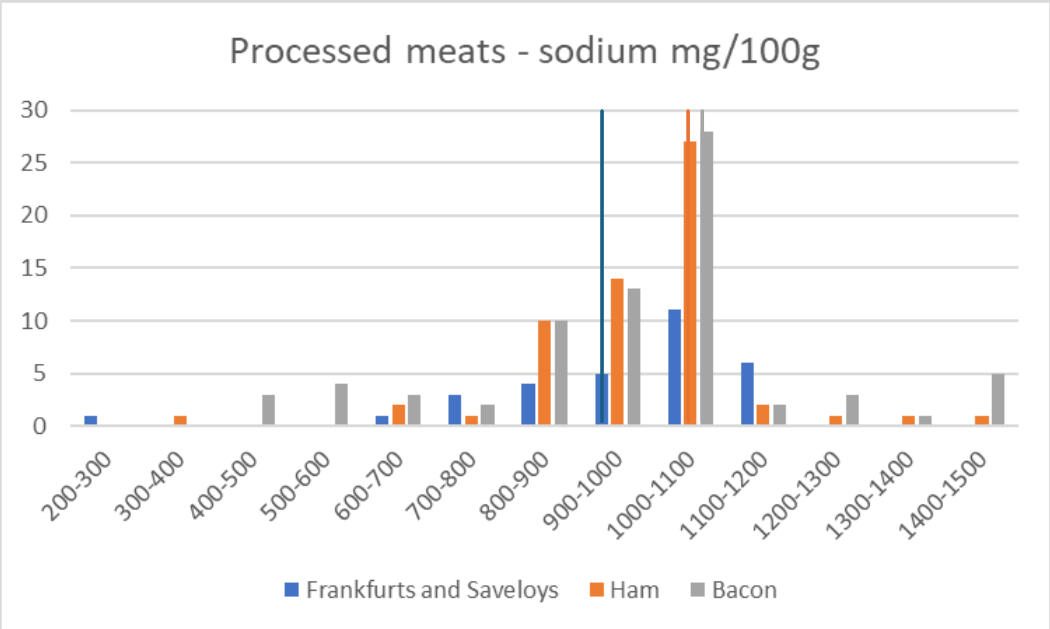
The saturated fat target for the pizza category was maintained at 4g/100g. Disaggregation of this category was explored, including by toppings with and without cured meat as per the sodium target. However, as illustrated by the above graph, there was no appreciable difference between the topping types, and the current target is considered feasible for all products. This target is depicted by a thin line on the graph.

9.3 Processed Deli Meats - sodium (n=53)



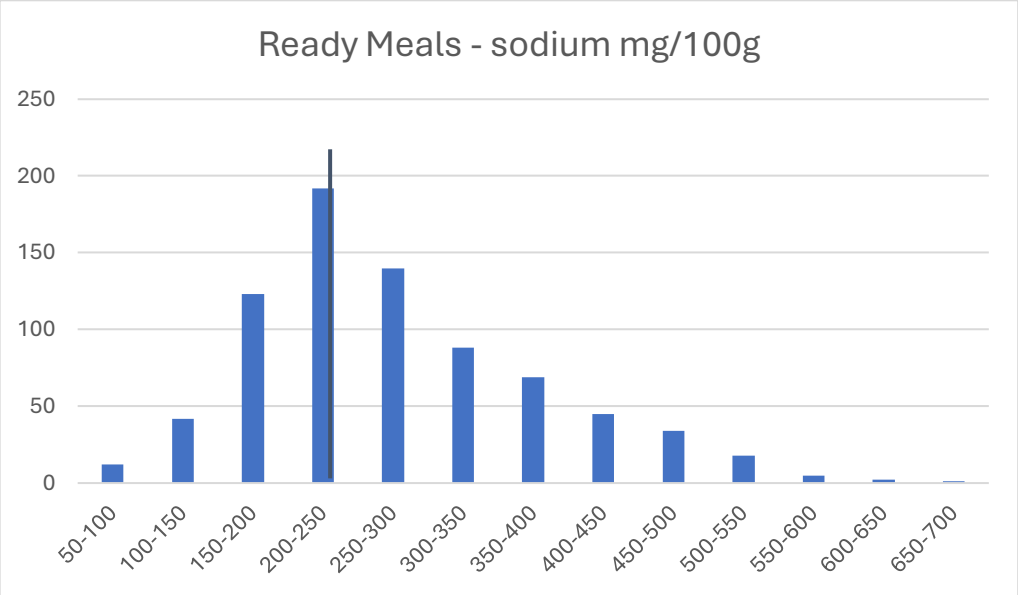
Current target for *Processed deli meats* (720mg/100g) depicted by red line. Proposed target shown with green line (810mg/100g).

9.0 Processed meats (excluding processed deli meats) - sodium (n=166)



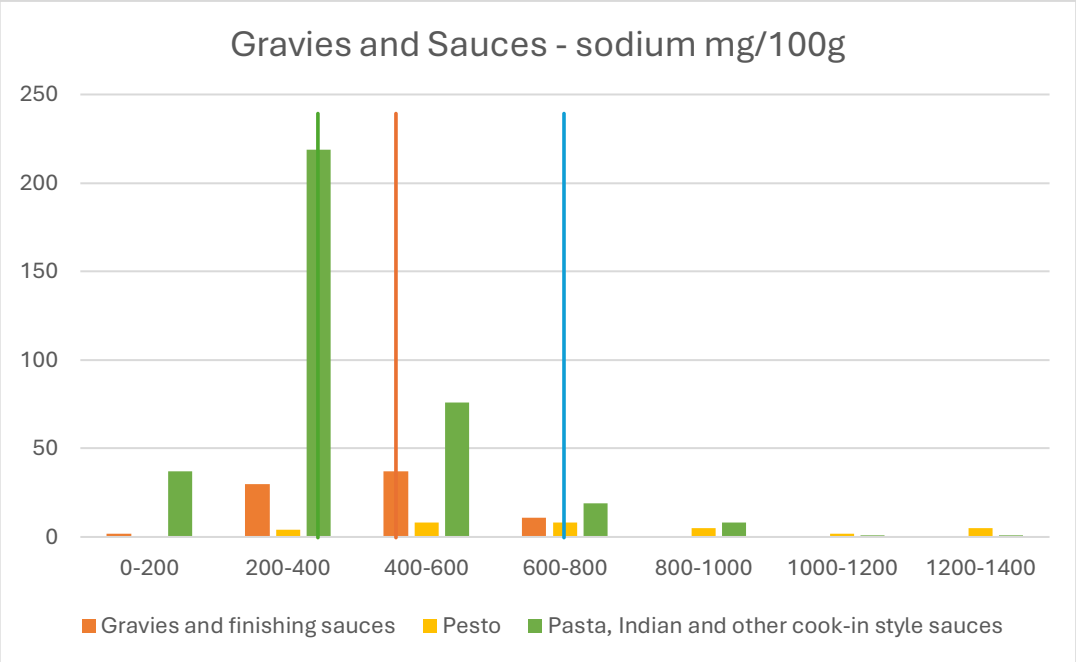
Changes were made to the sodium target for processed deli meats (see Processed Deli Meats), while the remaining sodium targets for processed meats categories were maintained: *Frankfurts and saveloys* (900mg/100g), *Ham* (1005mg/100g) and *Bacon* (1005mg/100g). These targets are depicted by thin lines on the graph as per graph legend.

10.0 Ready Meals – sodium (n=771)



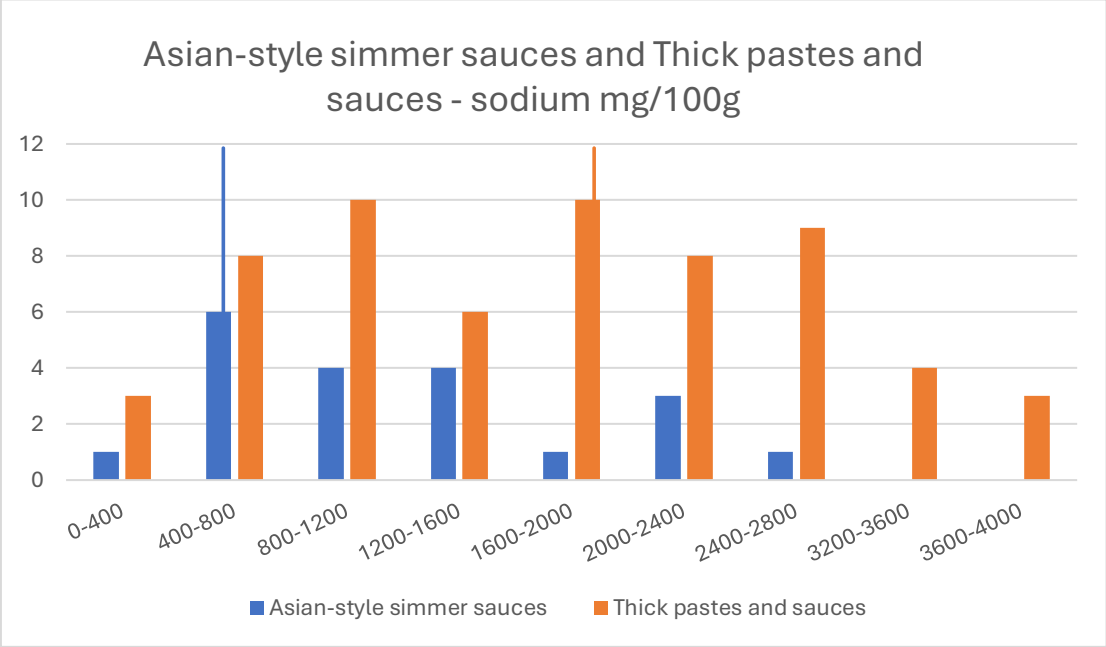
The sodium target for the *Ready Meals* category was maintained at 250mg/100g. This target is depicted by a thin line on the graph.

11.0 Sauces - sodium (n=453) (Excluding Asian-style simmer sauces and pastes)



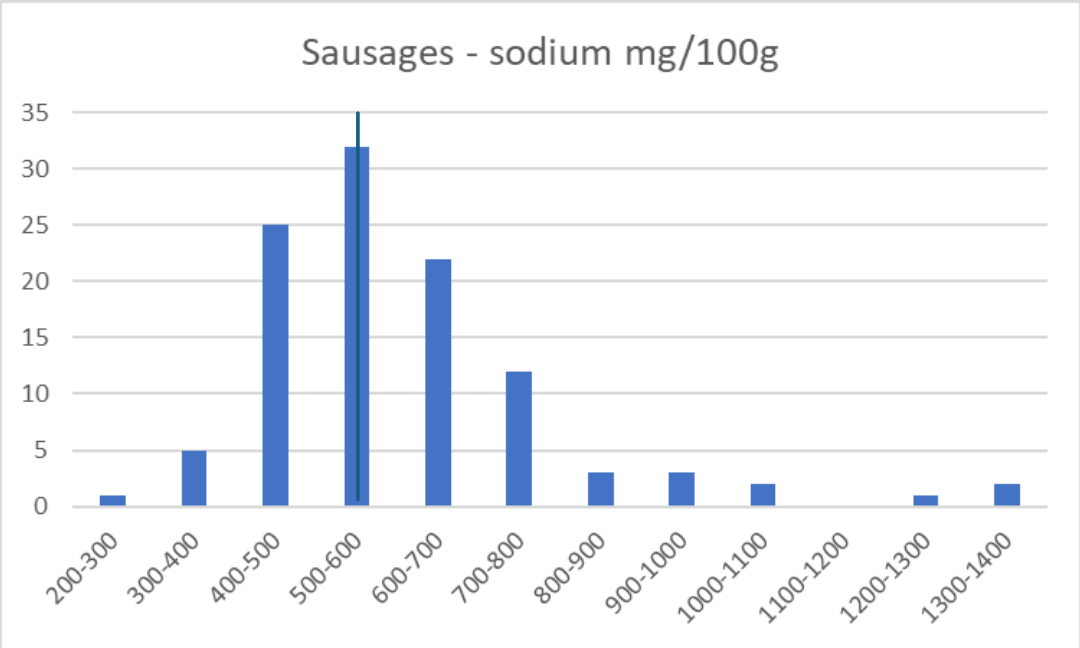
There were no changes to the sodium targets for *Gravies and finishing sauces* (450mg/100g), *Pesto* (720mg/100g), or *Pasta, Indian and other cook-in style sauces* (360mg/100g). The inclusions were updated for the *Pasta, Indian and other cook-in style sauces* (previously called *Other savoury sauces*). The existing targets are depicted by a thin line on the graph as per graph legend.

11.0 Sauces - 11.3 Asian-style simmer sauces, and 11.5 Thick pastes and sauces - sodium (n=88)



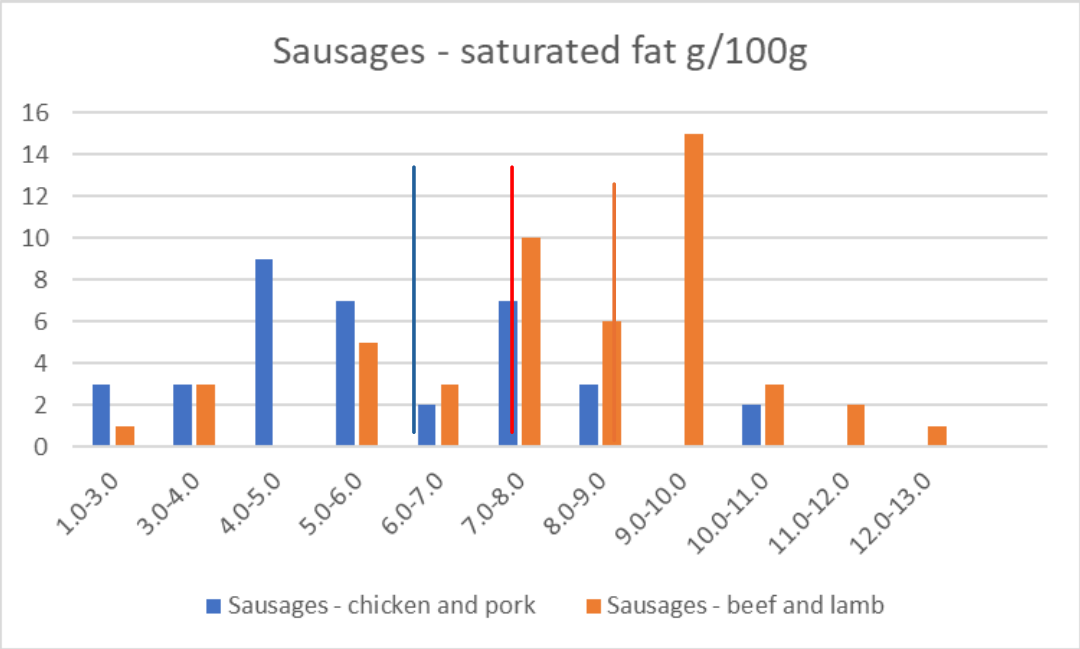
The sodium target for *Asian-style simmer sauces* was maintained at 680mg/100g, while updating the name (previously *Asian style cooking sauces*) and inclusions. A new category and target was developed for *Thick pastes and sauces* (2000mg/100g). These targets are depicted by a thin line on the graph as per graph legend.

12.0 Sausages - sodium (n=107)



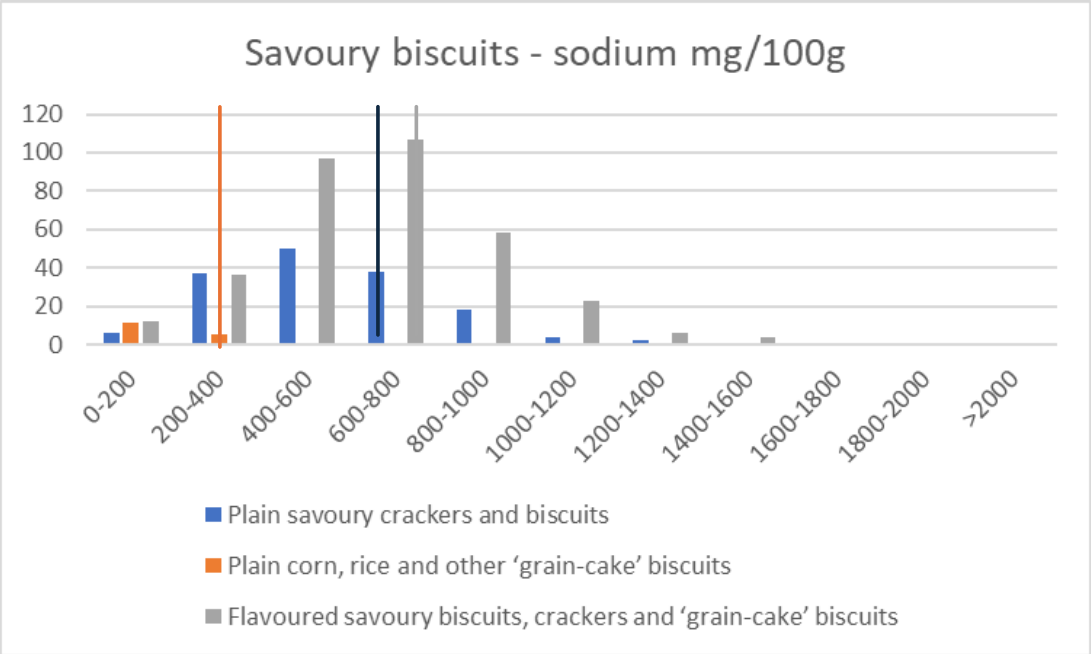
The sodium target for the *Sausages* category was maintained at 540mg/100g. This target is depicted by a thin line on the graph.

12.0 Sausages – saturated fat (n=107)



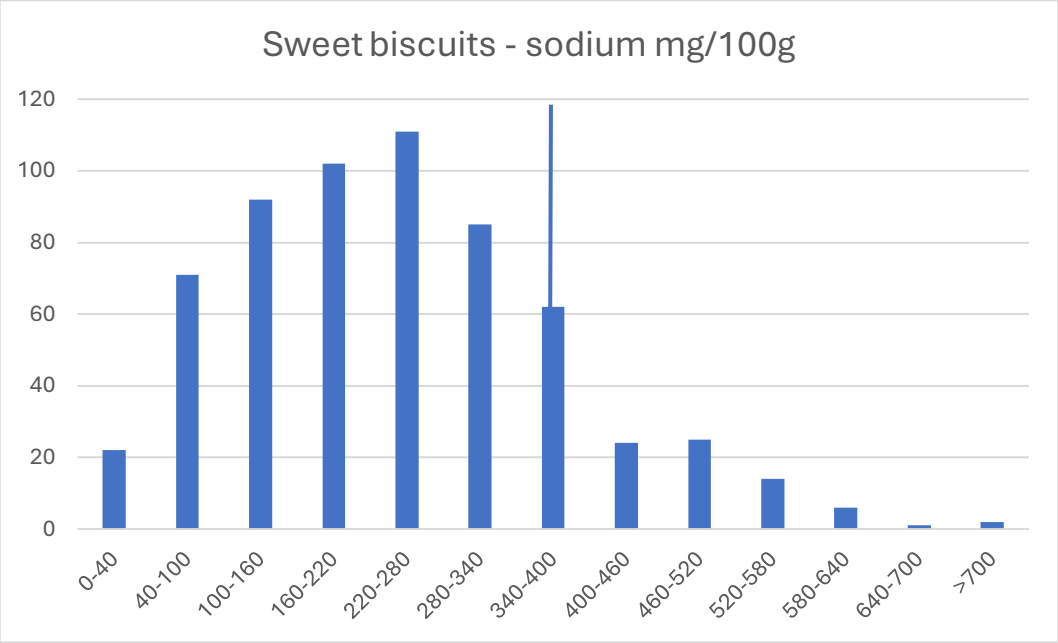
The *Sausages* category was disaggregated to account for the naturally occurring saturated fat differences between the varieties. The target for *Sausages – chicken and pork* was lowered to 6g/100g, while the target for *Sausages – beef and lamb* was increased to 8.5g/100g. These targets are depicted by a thin line on the graph as per graph legend, while the original target (7g/100g) is shown in red.

13.0 Savoury biscuits - sodium (n=518)



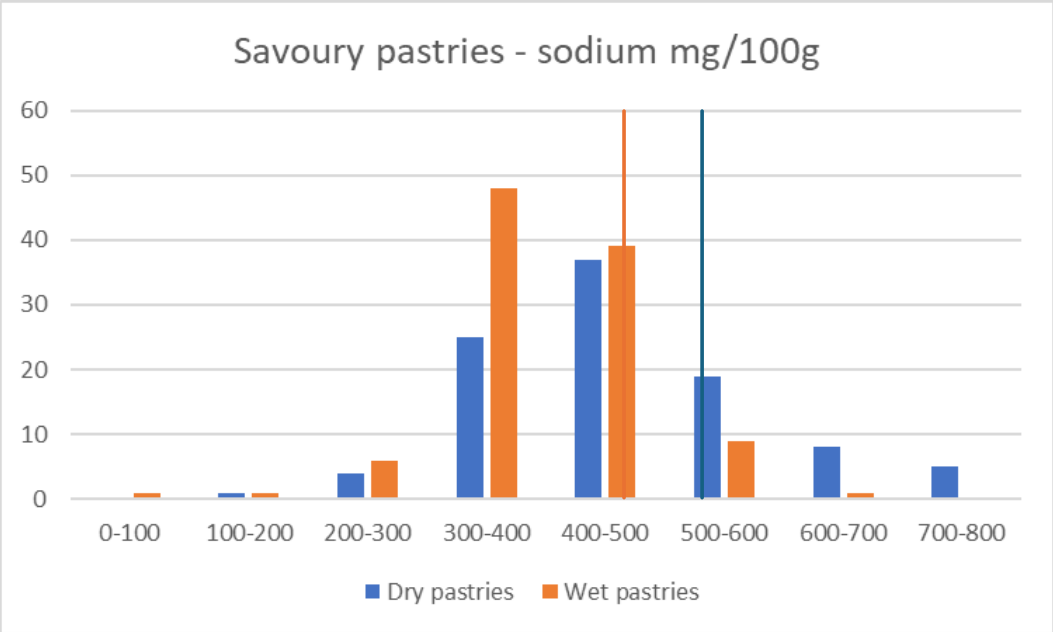
The sodium targets for the savoury biscuits categories were maintained: *Plain savoury crackers and biscuits* (630mg/100g), *Plain corn, rice and other 'grain-cake' biscuits* (270mg/100g) and *Flavoured savoury biscuits, crackers and 'grain-cake' biscuits* (720mg/100g). These targets are depicted by thin lines on the graph as per graph legend.

13.4 Sweet biscuits – sodium (n=618)



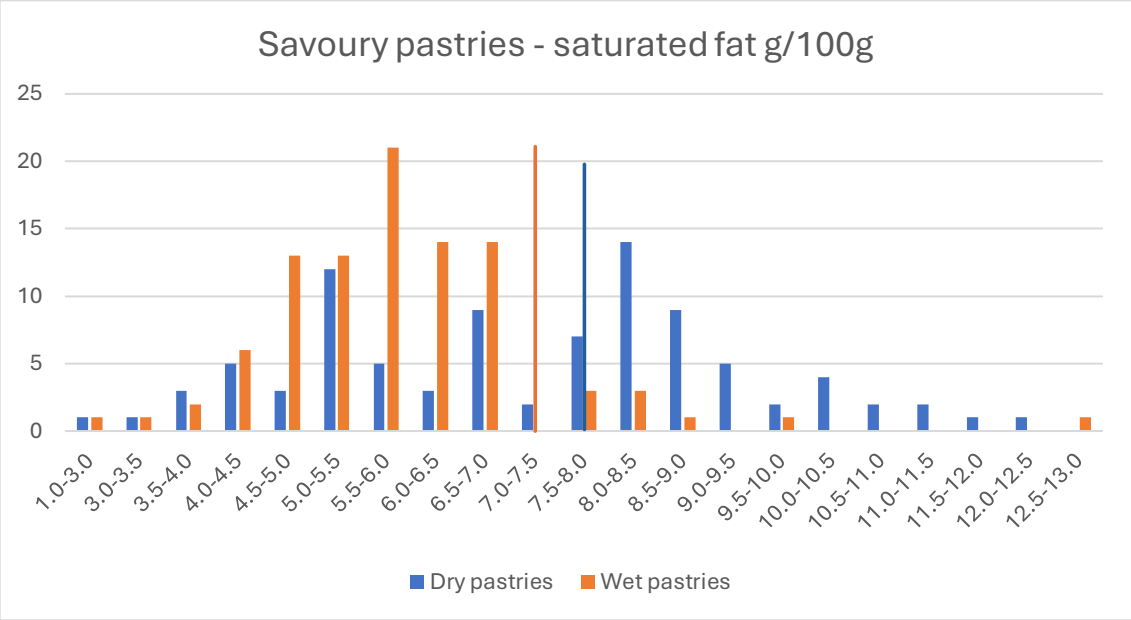
The recommended sodium target for *Sweet biscuits* is 350mg/100g. This target is depicted by a thin line on the graph.

14.0 Savoury pastries - sodium (n=204)



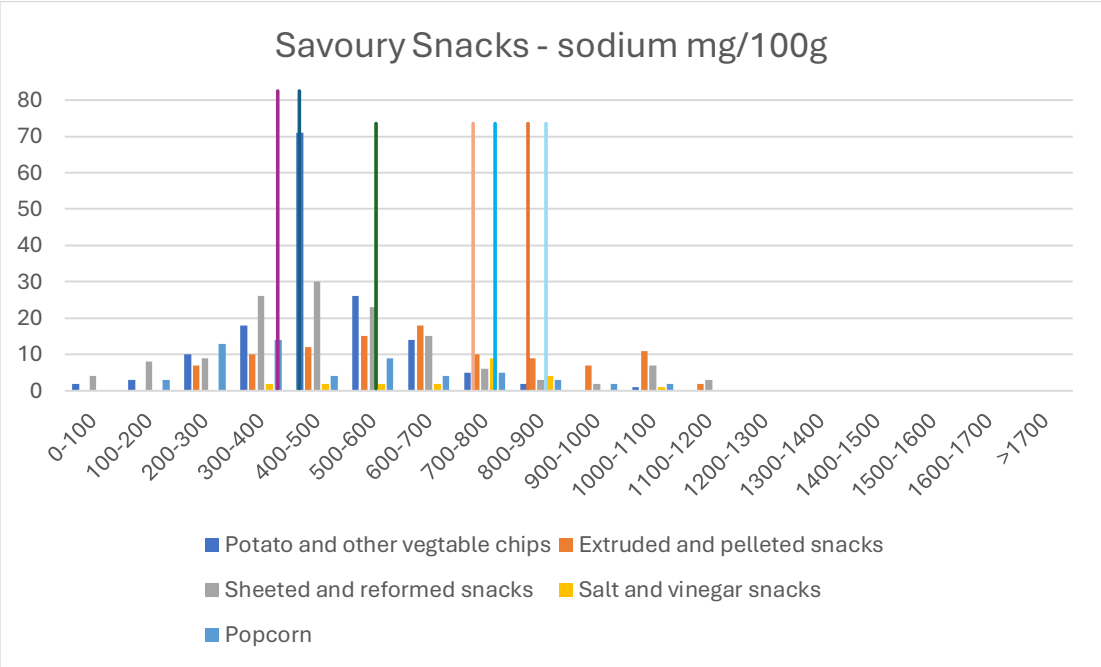
The sodium targets for the savoury pastries categories were maintained: *Dry pastries* (500mg/100g), *Wet pastries* (400mg/100g). These targets are depicted by thin lines on the graph as per graph legend.

14.0 Savoury Pastries – saturated fat (n=204)



The saturated fat target for *Savoury pastries – dry pastries* was increased from 7g/100g to 8g/100g to due to the higher saturated fat content of quiches and sausage rolls, which make up a large proportion of the category. The saturated fat target for *Savoury pastries – wet pastries* was maintained at 7g/100g. These targets are depicted by a thin line on the graph as per graph legend.

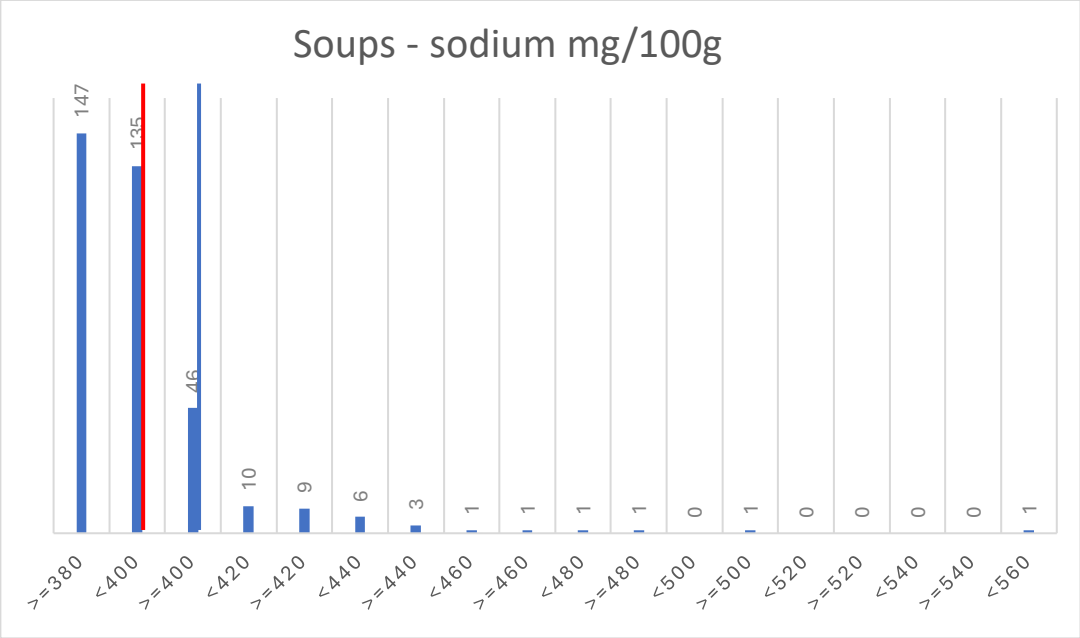
15.0 Savoury Snacks - sodium (n=492)



Recommended sodium target for *Potato and other vegetable chips* is maintained at 500mg/100g and depicted by dark blue line on the graph as per graph legend. The sodium target for *Sheeted and reformed snacks* (new category, 520mg/100g) depicted with dark green line as per graph legend. The target for the new *Extruded and pelleted snacks* category is shown in orange (810mg/100g), with current target in lighter orange (720mg/100g). The new target for *Salt and vinegar snacks* shown in blue (720mg/100g), with current

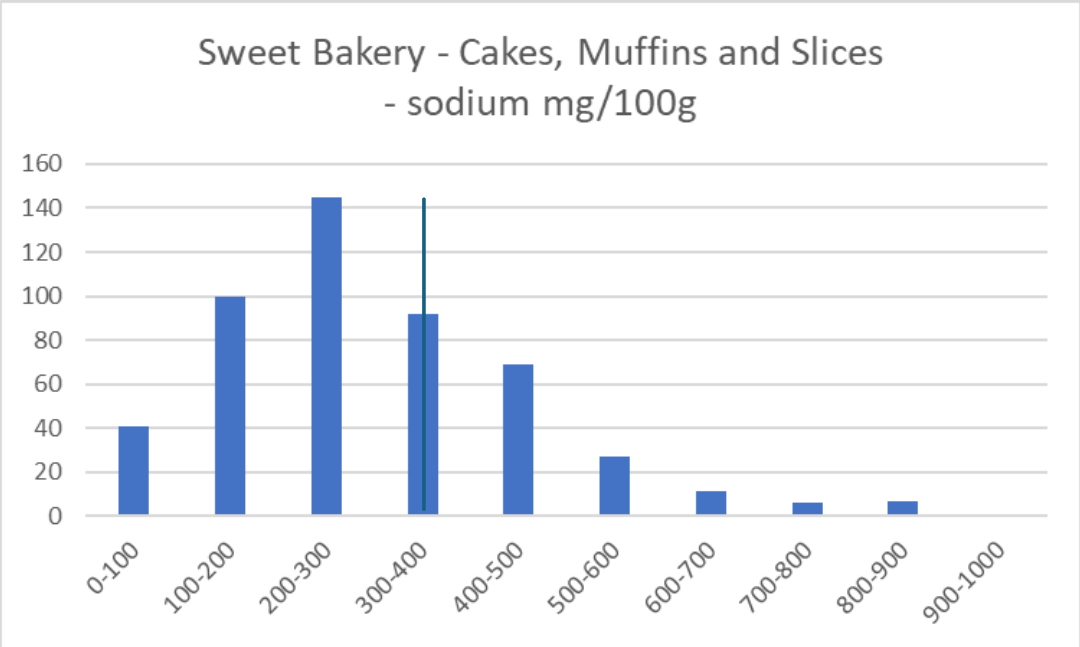
target in lighter blue (810mg/100g). The sodium target for the *Popcorn* category was maintained at 360mg/100g. This target is depicted by a thin purple line on the graph.

16.0 Soups - sodium (n=363)



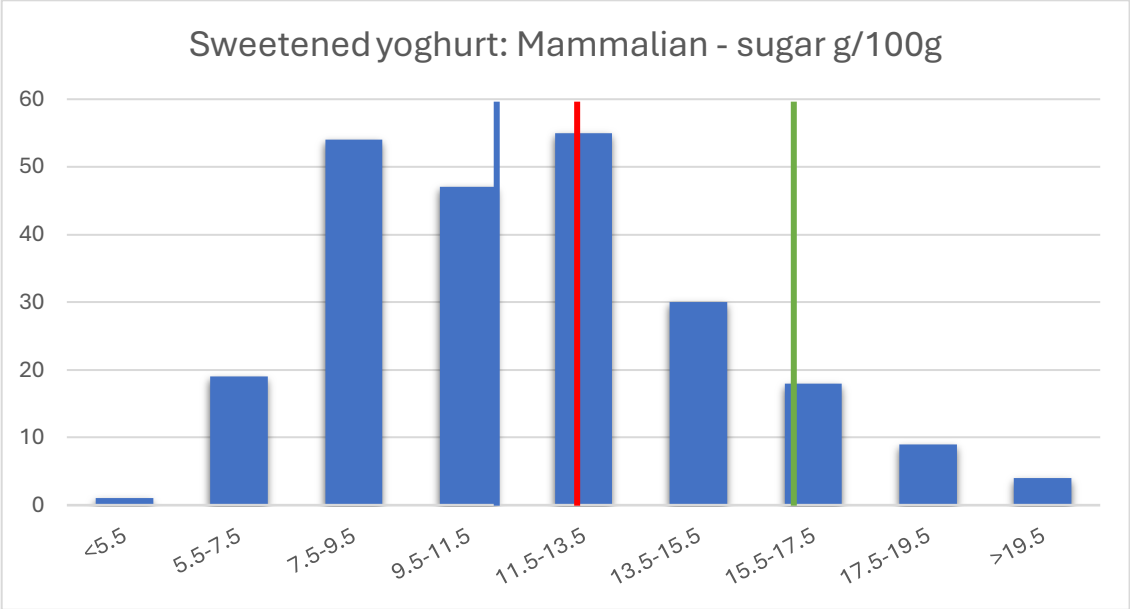
The recommended sodium target for *Soups* will be maintained at 280mg/100g. In addition, an upper limit will be introduced at 300mg/100g. The upper limit is depicted by a thin blue line on the graph, while the lower target is shown in red.

17.0 Sweet Bakery - Cakes, Muffins, Slices – sodium (n=499)



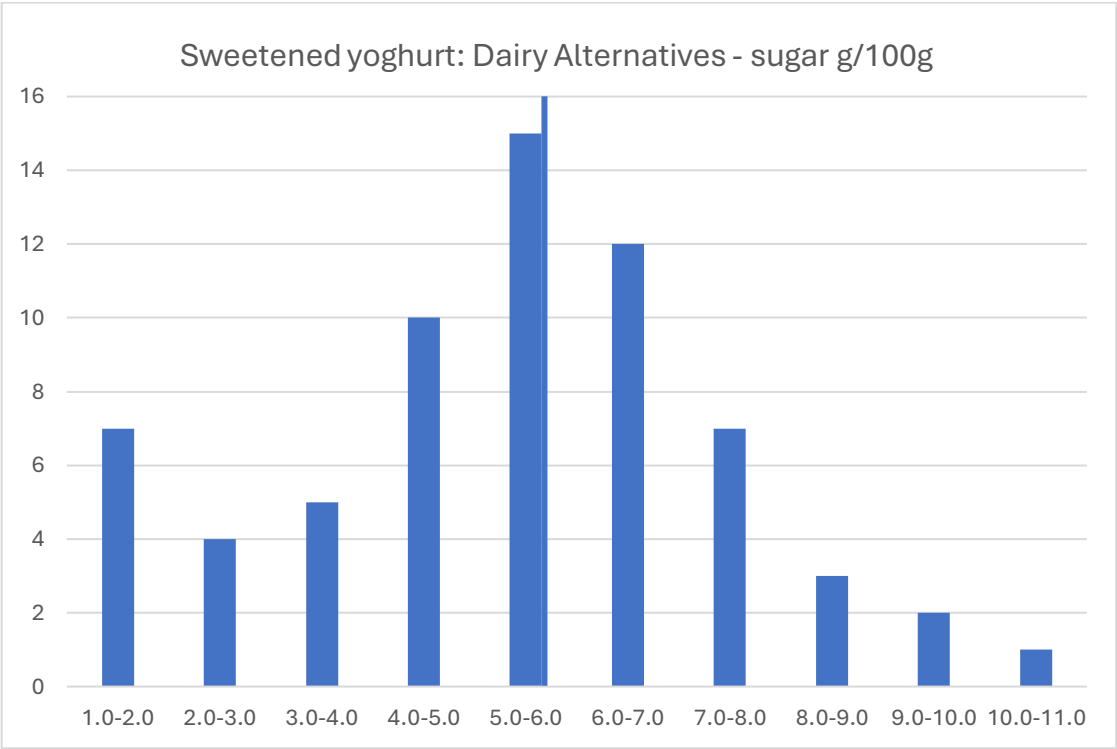
The sodium target for the *Sweet Bakery - Cakes, Muffins and Slices* category was maintained at 360mg/100g. This target is depicted by a thin line on the graph.

18.1 Sweetened yoghurt: Mammalian - sugar (n=237)



The recommended sugar target for *Sweetened yoghurts: Mammalian* will reduce from 12.5g/100g to 11.5g/100g. The new target is depicted by a thin blue line on the graph, while the original target is shown in red. In addition, an upper limit has been set at 16.0g/100g, depicted by the green line on the graph.

18.2 Sweetened yoghurt: Dairy Alternatives - sugar (n=66)



The recommended sugar target for *Sweetened yoghurts: Dairy Alternatives* is 6g/100g. This target is depicted by a thin line on the graph.

Appendix 3 – Descriptive statistics for new or updated PRP sub-categories[7]

Category	Count	Nutrient/unit	Min	Max	Average	Median	% above target
1.3 Leavened breads with additions	39	Sodium mg/100g	351	893	558	549	67%
4.1 Crumbed and battered proteins: Meat and poultry and plant-based alternatives	186	Sodium mg/100g	107	900	467	442	44%
9.1 Pizza: Pizzas with cured meat toppings	59	Sodium mg/100g	220	1040	511	482	47%
9.2 Pizza: Pizzas with all other toppings	53	Sodium mg/100g	176	897	443	402	40%
10.3 Processed meat: Processed deli meat	53	Sodium mg/100g	420	1530	863	847	62%
11.3 Sauces: Asian-style simmer sauces	20	Sodium mg/100g	270	2487	1192	904	75%
11.3 Sauces: Pasta, Indian-style and other cooking sauces	361	Sodium mg/100g	24	1270	354	337	39%
11.5 Sauces: Thick pastes and sauces	68	Sodium mg/100g	251	4520	2044	1930	46%
12.1 Sausages: Chicken/Pork	41	Saturated fat g/100g	1	11.4	6.1	5.8	44%
12.2 Sausages: Beef/Lamb/Veal	64	Saturated fat g/100g	2.9	13.1	8.6	8.4	63%
13.3 Savoury and sweet biscuits: Flavoured savoury biscuits, crackers and 'grain-cake' biscuits	341	Sodium mg/100g	44%	44%	44%	44%	35%
13.4 Savoury and sweet biscuits: Sweet biscuits	601	Sodium mg/100g	5	892	241	233	19%
14.1 Savoury pastries: Dry pastries	99	Saturated fat g/100g	2.8	12.2	7.2	7.3	33%
15.1 Savoury snacks: Potato and other vegetable chips	152	Sodium mg/100g	51	1000	466	478	32%

[7] Calculated from the FoodSwitch databases, for categories where data was available.

Category	Count	Nutrient/unit	Min	Max	Average	Median	% above target
15.2 Savoury snacks: Salt and vinegar snacks	23	Sodium mg/100g	300	1750	745	778	57%
15.3 Savoury snacks: Extruded and pelleted snacks	121	Sodium mg/100g	238	2980	806	690	39%
15.4 Savoury snacks: Sheeted and reformed snacks	148	Sodium mg/100g	44	2000	533	484.5	37%
16.1 Soups	363	Sodium mg/100g	43	590	259	265	47%
18.1 Sweetened yoghurt: Mammalian	237	Sugar g/100g	5.1	20.4	11.6	11.4	49%
18.2 Sweetened yoghurt: Dairy Alternatives	59	Sugar g/100g	1.2	10.1	5.3	5.4	20%

Appendix 4 – Considerations

In reviewing Wave 1 of the PRP, the Secretariat drew on a range of data sources and analytical approaches to ensure that sodium and saturated fat targets remained both ambitious and achievable. The review was informed by extracts of the FoodSwitch dataset (September 2021[8], September 2023[9], September 2025[10]), the Healthy Food Partnership's 4-year progress reports (participating companies, detailed feedback from industry stakeholders, and the latest population level nutrition intake data (NNPAS 2023). Targets were also benchmarked against comparable international programs in New Zealand), the UK and Canada, to ensure Australia's approach was both evidence-based and globally relevant (with priority given to New Zealand due to the joint nature of the New Zealand and Australian food system (with priority given to New Zealand due to the joint nature of the New Zealand and Australian food system).

Target Adherence Analysis

A central consideration throughout the review was the proportion of products in each category that currently meet or fall below the existing and proposed targets. For each food category, the Secretariat examined not only the absolute number of products exceeding the targets, but also the trends over time - specifically, how adherence had shifted since the PRP's inception and how participating companies compared to the broader market. The analysis also considered the distribution of nutrient levels within each category, recognising that the proportion of products above or below a target does not indicate how far products are from that target. This distributional information, illustrated through histograms in Appendix 4, provided insight into whether products clustered close to the target or were substantially above it. Together, these considerations enabled a more nuanced assessment of where targets could be strengthened, maintained, or, where necessary, relaxed to reflect technical or commercial realities.

Technical Feasibility Assessment

Assessment of technical feasibility was an integral part of the review process. Industry feedback highlighted barriers to reformulation, such as the functional role of sodium in shelf life and product quality, and the natural fat content inherent to sausages. Where a high proportion of products already met the target, and where international benchmarks supported further reduction, the Secretariat recommended strengthening the target. Conversely, in categories where adherence was low and technical constraints were well-documented, such as processed deli meats and extruded snacks, a more achievable target was supported to encourage broader industry participation and incremental improvement.

Public Health Impact Considerations

Another important lens was the potential public health impact, particularly for at-risk population groups. The Secretariat considered data from NNPAS 2023 to assess if the food categories currently in the PRP remain top contributors to population intakes of sodium, saturated fat and added sugars. Data from the National Nutrition and Physical Activity Survey 2011-12 was used at the outset of the PRP to prioritise categories for reformulation, particularly those with high consumption across the general population and among population sub-groups.

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[8] Data on *Sweetened yoghurt: Dairy alternatives* and *Plant-based crumbed and battered proteins*
[9] Data on Wave 1 categories
[10] Data on Wave 2 categories

Sodium

NNPAS 2023 highlighted that daily sodium intake remains above recommended levels, with foods included in the Partnership's reformulation categories remaining key contributors. See Table 6 for the proportion of sodium from these foods.

Table 6. Proportion of sodium from NNPAS 2023 mapped to PRP food categories

PRP Food Category	2–4 years	5–11 years	12–17 years	18–29 years	30–49 years	50–64 years	65–74 years	75 years and over	2–17 years	18 years and over	2 years and over
Leavened breads	8.9	7.8	5.7	5.1	6.3	7.8	9.2	10.7	6.9	7.0	7.0
Flat breads	4.1	3.8	2.8	2.6	3.1	1.7	1.7	1.3	3.4	2.4	2.6
Breakfast cereals	3.0	2.8	2.0	0.7	1.0	1.4	1.8	2.7	2.4	1.3	1.5
Cheese	3.7	2.5	1.9	1.8	2.2	2.6	2.6	2.9	2.3	2.3	2.3
Crumbed and battered proteins	5.3	4.7	5.1	1.8	2.3	1.8	2.0	1.6	4.9	2.0	2.6
Gravies and savoury sauces	2.0	3.1	4.2	5.3	3.6	3.9	3.3	2.0	3.5	3.9	3.8
Pizza	2.2	2.2	4.4	3.2	4.0	2.3	2.4	1.2	3.3	3.0	3.1
Processed meat	3.3	4.9	4.0	5.4	4.6	5.1	5.0	6.4	4.3	5.1	4.9
Ready meals	1.6	1.4	2.3	4.9	4.5	3.2	3.6	4.8	1.8	4.3	3.8
Sausages	3.3	4.1	3.1	2.7	2.6	2.6	3.3	3.7	3.6	2.8	2.9
Savoury biscuits	3.0	2.1	1.3	0.7	0.7	0.8	1.1	0.9	1.9	0.8	1.0
Sweet biscuits[11]	2.4	1.8	0.9	0.8	1.2	1.3	1.6	2.4	1.4	1.3	1.3
Savoury pastries	1.5	2.8	4.2	4.3	3.9	4.7	3.5	4.1	3.3	4.2	4.0
Savoury snacks	3.1	4.4	3.5	1.7	1.8	1.7	0.9	0.5	3.8	1.6	2.0
Soups[12]	0.1	0.1	0.1	0.3	0.5	0.6	0.9	0.9	0.1	0.5	0.5[13]
Sweet bakery	1.8	2.0	1.8	1.1	1.3	1.6	1.7	1.9	1.9	1.4	1.5

Sugar

The findings of NNPAS 2023 indicate free sugars now account for 8.2% of total energy intake (within World Health Organization recommendations[14]) sweetened dairy products such as yoghurt and

[11] New category

[12] Note that the proportions for the 2–4, 5–11, 12–17 and 18–29 year age groups has a high margin of error and should be used with caution.

[13] Among adults aged 65 and older, the proportion of sodium derived from soup (0.9%) is double that of the total population average (0.45%).

[14] The World Health Organisation recommends free sugars make up no more than 10% of total energy intake.

flavoured milks, and breakfast cereals remain notable sources of free and total sugars, particularly for children (see Table 7). These insights informed decisions to lower the targets in categories like sweetened yoghurt, and to maintain or adjust others.

Table 7. Proportion of daily total sugars from select food groups – children vs adult population

AUSNUT Food group	2–4	5–11	12–17	2–17	18 years and over	Total 2 years and over
Breakfast cereals, ready to eat	2.9	4.1	3.7	3.8	2.4	2.7
Flavoured milks	0.3	1.7	1.7	1.5	1.6	1.5
Gravies and savoury sauces	0.8	1.7	2.1	1.8	1.5	1.5
Carbonated soft drinks, energy drinks, electrolyte drinks and flavoured mineral waters	0.7	4.5	16.1	8.8	12.4	11.6
Fruit drinks	0.2	0.7	0.6	0.6	0.3	0.4
Muesli and snack bars	0.8	1.4	1.2	1.3	0.6	0.7
Yoghurt	5.4	2.4	1.6	2.5	1.8	1.9

Saturated fat

Data on saturated fat intake show the main contributors to saturated fat intake are covered by the current PRP categories. Most of the remaining categories were not selected for reformulation as the removal of saturated fat from those categories is technically constrained. Where appropriate, categories not suited to reformulation were assigned maximum recommended serving sizes under the Partnership's Industry Guide to Voluntary Serving Size Reduction.

See Table 8 below for the top 15 contributors to saturated fat intake, and whether the food category is covered by the PRP categories for saturated fat or Partnership Serving Size guidance.

Table 8. Top contributors to daily saturated fat intake

AUSNUT sub-major food group	Proportion of saturated fat for 2 years and over	Food is captured by PRP categories	Food is captured by serving size recommendations
Mixed dishes where cereal is the major ingredient[15]	17.5	✓	✓
Dairy milk (cow, sheep and goat)	6.9		
Cheese	5.4		
Pastries	4.8	✓	✓
Coffee and coffee substitutes	4.4		
Sweet biscuits	4.3		✓
Chocolate and chocolate-based confectionery	3.8		✓
Butters	3.6		
Mixed dishes where poultry or feathered game is the major component	3.4		
Potatoes, chips and other potato products and dishes	3.2		✓
Beef, sheep and pork, unprocessed	3.0		
Sausages, frankfurts and saveloys	2.7	✓	

[15] Includes pizza, burgers, sandwiches, pasta/rice dishes, dumplings and sushi

Frozen milk products	2.4		✓
Yoghurt	2.5		
Cakes, muffins, scones, cake-type desserts	2.2		✓

Market Share

Market share was a key consideration in balancing the ambition of reformulation targets with the practicalities of industry participation. The Secretariat assessed the number of companies currently engaged in the Partnership PRP relative to the broader food market, using ABS data and FoodSwitch brand coverage for a crude estimate or market representation. In categories where participation was low, particularly those with high population-level nutrient contributions, the Secretariat weighed the benefits of strengthening targets against the potential impact on recruitment. In some cases, targets were adjusted to improve feasibility and encourage broader uptake, recognising that expanding participation can amplify the PRP's overall public health impact.

Market changes

The review also took into account evolving market trends and product innovation. Category definitions were updated to reflect the growing diversity of the food supply, such as the explicit inclusion of plant-based alternatives in the crumbed and battered proteins category. In some cases, new categories were introduced, such as thick sauces, thick pastes, and sheeted/reformed snacks, to better capture the range of products now available and to set technically appropriate targets.

Throughout the process, the Secretariat was mindful of the need for robust monitoring and reporting, while also recognising the limitations of available data. The analysis relied on both FoodSwitch market data and company self-reporting, and the Secretariat acknowledged the importance of maintaining the 80:20 rule to allow companies some flexibility in their reformulation efforts. This approach supports innovation and consumer choice, while still driving meaningful change.

The table below provides a checklist of factors considered in the review.

Checklist of Review Considerations

Review Element	Details
Data Sources Used	• FoodSwitch datasets (Sept 2023 and Sept 2025) Healthy Food Partnership 4-year progress reports for Wave 1 and Wave 2 • Industry stakeholder feedback
International Benchmarking	• Targets compared with programs in New Zealand, UK, and Canada
Target Adherence Analysis	• Assessed % of products meeting targets across time-points • Compared participating companies vs wider market
Technical Feasibility Assessment	• The role of sodium in shelf life and product quality • Consideration of different processing methods Natural fat content in sausages and technical properties of saturated fat • Industry feedback on reformulation challenges
Target Adjustment Criteria	• High adherence from participating companies and/or wider market → lowering or maintaining the target, and/or focus on recruitment

Review Element	Details
	• Low adherence from participating companies + technical barriers → increasing target
Public Health Impact Considerations and Consumption Data	• Considered ABS data on nutrient contribution to diet from NNPAS 2023. • Prioritised categories with high population-level intake • Focused on sodium for older adults and sugar for children
Market Share	• Assessed market share of participating companies • Balanced target ambition with recruitment potential
Market changes	• Refined definitions and introduced new categories to reflect market trends

Summary

In summary, the Secretariat sought to balance public health ambition with technical and commercial feasibility. Where possible, targets were strengthened in high-consumption categories and maintained or modestly relaxed in categories with clear barriers to reformulation. The overall intent was to ensure that the PRP continues to deliver positive health outcomes, particularly for at-risk groups, while remaining practical and sustainable for industry. These considerations underpin the recommendations outlined in the category review and will help guide the next phase of the PRP's implementation.

Appendix 5 - Consultation Summary Report: Healthy Food Partnership Reformulation Program: Consultation on proposed revisions and new categories

Executive Summary

The Partnership Secretariat has undertaken a review of existing categories and targets established under the Partnership Reformulation Program Wave 1 (2020–2024) and Wave 2 (2021–2025/26). The aim of the review is to ensure the targets remain fit-for-purpose, feasible, and align with current evidence. The review drew on updated food composition data, international benchmarks, stakeholder input, and emerging evidence, including data from the 2023 National Nutrition and Physical Activity Survey (NNPAS).

A consultation paper and supporting evidence were distributed to the Healthy Food Partnership Executive Committee, the Implementation, Monitoring and Evaluation Reference Group (IMERG), and participating companies. A total of twelve responses were received. Feedback was synthesised to provide a balanced representation of stakeholder views, identifying areas of broad support, mixed views, and concern across both existing and proposed new categories.

Overall, stakeholders expressed support for many of the proposed changes, particularly where they reflected current market trends and technical feasibility. Stakeholders also raised issues outside the scope of specific consultation, including the need to improve industry participation, strengthen governance arrangements, and evaluate the Program against its long-term objectives. There was support for improved monitoring of population-level dietary outcomes.

Stakeholder feedback to this consultation has informed refinement of the reformulation targets. Endorsement of the refined targets will now be sought.

1. Introduction

The Partnership Reformulation Program (PRP) Wave 1 (2020-2024) and Wave 2 (2021-2025/26) established targets across a range of commonly consumed food categories for sodium, saturated fat and sugar. Following an evaluation of the four-years of implementation and updated evidence, the Department reviewed the existing categories and targets to ensure they continue to be appropriate, feasible and aligned with current market trends and consumption patterns.

The review assessed whether Wave 1 and Wave 2 categories and targets remain fit-for-purpose by considering: updated food composition data (FoodSwitch database), feedback from industry and public health stakeholders, international benchmarks (New Zealand, United Kingdom and Canada), and updated consumption data from the NNPAS 2023. The review also considered elements from the 2024 Wave 3 consultation, including the rapid changes in the market for plant-based alternatives, and incorporating plant-based equivalents into relevant existing categories where appropriate.

Informed by this review, changes to nutrient targets were recommended as well as the introduction of new product categories. The recommendations were to strengthen targets for 3 categories, adjust targets for 11 categories, introduce 10 new categories, and maintain targets for 6 categories. The primary aim of these changes was to preserve or enhance public health outcomes for the PRP while ensuring technical feasibility and sustaining industry engagement.

2. Consultation

On 26 March 2026 a consultation paper was sent to the Healthy Food Partnership Executive Committee, the Implementation, Monitoring and Evaluation Reference Group (IMERG) and companies participating in the PRP.

A total of twelve submissions were received with the following representation of sectors:

Stakeholder	Number of responses received
Industry	10
Public health	2

Responses were carefully reviewed and synthesised. Key themes were consolidated to identify areas of consensus and divergence across respondents. Not all respondents addressed every consultation question; therefore, findings have been interpreted in the context of stakeholder expertise and the breadth of perspectives provided, rather than being weighted by the number of responses to individual questions.

3. Category-level insights

Industry tended to respond to technical details on the proposal and in general supported most of the proposed changes with suggestions on granular topics such as inclusion/exclusion criteria and technical feasibility. Public health stakeholders tended to provide comments on the broader application of the PRP and made suggestions to improve the Partnership's governance and public health impacts. Feedback received that was outside the scope of the immediate consultation is provided at section 5.

The following tables provide a high-level overview of stakeholder views to the proposed changes. Table 1 presents new categories and groups them based on the nature of stakeholder views—broad support or agreement, mixed views, and significant concern. Table 2 applies the same approach to proposed existing categories.

Table 1: Stakeholder views of proposed changes to new categories

New categories with broad support/agreement	
Food category/sub-category	• Savoury snacks: Sheeted and reformed snacks • Pizzas with cured meat toppings • Pizzas with all other toppings • Sweetened yoghurt: Dairy alternatives
New categories with mixed views	
Food category/sub-category	• Gravies and sauces: Thick pastes and sauces • Savoury and sweet biscuits: Sweet biscuits • Sausages: Chicken/Pork
New categories with significant concern	
Food category/sub-category	• Bread: Leavened bread with additions • Gravies and sauces: Tomato sauce • Sausages: Beef/Lamb/Veal

Table 2: Stakeholder views of proposed changes to existing categories

Existing categories with broad support/agreement	
Food category/sub-category	• Processed meat: Processed deli meat • Savoury and sweet biscuits: Flavoured savoury biscuits, crackers and 'grain-cake' biscuits • Savoury snacks: Salt and vinegar snacks • Savoury snacks: Extruded and pelleted snacks • Savoury snacks: Potato snacks • Crumbed and battered proteins: Meat and poultry and plant-based alternatives • Pizza
Existing categories with mixed views	
Food category/sub-category	• Savoury pastries: Dry pastries • Gravies and sauces: Asian-style simmer sauces • Gravies and sauces: Pasta, Indian-style and other cooking sauces
Existing categories with significant concern	
Food category/sub-category	• Soups • Sweetened yoghurt: Mammalian

4. Feedback on proposed changes to new and existing categories

The following tables provide a more detailed account of stakeholder views underpinning the high-level overview presented above. Table 3 presents the proposed changes to new categories, and Table 4 presents the proposed changes to existing categories. The Partnership Secretariat's response to these comments is also provided.

Table 3. Summary of proposed changes to new categories

Category	Definition	Proposed target	Stakeholder views	Partnership secretariat response
Bread: Leavened bread with additions	Leavened bread loaves and rolls with high sodium additions.	**Sodium** 450mg/100g	Significant concerns. Definition - ambiguity with this definition i.e. whether a pizza roll (with pizza sauce, ham, bacon cheese and olives) be considered a pizza or a roll. If the sub-category is introduced then new category suggested to align with 'pizza with cured meat toppings' and 9.2 Pizzas with all other toppings. Clarification required on whether all formats of garlic bread are intended to be included (including fresh, refrigerated and frozen) variants. Confirmation also required on classification of products such as pizza rolls and share-and-tear varieties. Proposed target – target seems unrealistic as it is marginally higher than plain leavened bread. Reducing the quantity of toppings simply to meet the target would negatively impact the customer experience. Need to consider the purchase volume and its impact. For garlic bread, recommendation for it to be excluded.	Revised target following analysis of data. 33% of intended products meet the proposed target across a range of product types. Updates to inclusions list: Clarified treatment of pizza-like products. Garlic bread excluded.
Gravies and sauces: Thick pastes and sauces	Thick pastes and sauces used in very small quantities per serve (e.g. 20-30g) such as curry and Thai. Products within this category may require the addition of liquids such as tomato-based sauces, cream, or coconut milk.	**Sodium** 2000mg/100g	Mixed views. Definition – Clearer and further descriptors are required to ensure consistent application of the targets. There needs to distinguishment between 'thick paste' from 'thick sauce.' Examples to consider include curry pastes, concentrated stock/bouillon pastes, harissa and gochujang-style products). Clarity needed on whether the proposed serve size (20-30g) is an intended guideline or a strict requirement – (i.e. would a 50g sachet with 12.5g serving sizes be included based on this definition, or, would a product with a labelled serve size of 43g be considered in scope?) Suggest including 'tomato paste' in the exclusions list for clarity. Proposed targets – difficult to establish due to the broad range of products. It is also crucial to acknowledge this does not reflect the product's final contribution to the meal. Potentially a lower target of 1500mg/100g to be more suitable. Implementation considerations – nutritional profile of the final meal is driven by the other ingredients added, as the concentrated sauce or paste having a much smaller impact than its 'as sold' label suggests.	Curry pastes are in the inclusions. Updated for clarity. Definition updated to show the suggested serve size is a guideline. Exclusions updated to list tomato paste.

Category	Definition	Proposed target	Stakeholder views	Partnership secretariat response
Gravies and sauces: Tomato sauce	Commercially prepared sauce with a thick consistency, typically used as a condiment. Contains tomatoes, sugar, salt, food acid and spices.	**Sodium** 680mg/100g **Sugar** 23g/100g[16]	Significant concern Definition - does not provide a clear distinction from subcategory 6.6 Thick Pastes and Sauces, unclear whether products containing additional ingredients fall within the scope of this category. The term 'thick consistency' is ambiguous and recommended to remove. Needing confirmation on whether the definition includes or excludes barbecue sauces, and tomato sauces formulated with additional ingredients (e.g. added fruit purees, fruit juice, similar additions). Typically, consumption is in small amounts meaning it contributes relatively less to population intakes of sugar and sodium. Recommendation to include 'tomato paste' in exclusions list. Recommendation to replace 'Sauces where tomato is not a primary ingredient' and instead list examples of other condiments and tables that are excluded (e.g. barbeque sauce, chilli sauce (which may have tomato as a primary ingredient). Clarity needed on tomato chutney style products or tomato-based pizza sauces. Proposed target – not seen as appropriate as it would nullify 'reduced salt and sugar' claims, technical limitations and whether the target would result in a meaningful reduction in population-level consumption of sodium and sugar. Recommended to consider this product for portion size guidance and education.	Proposed category will not progress. Note that reduced sugar/salt varieties are available and do not want to interfere with ability to make nutrition content claims for reduced sodium/salt products. Agree with comments that this category contributes small amounts of sodium/sugar to overall population intakes.

[16] If the sauce nutrition information is expressed as per 100mL, apply the products specific gravity value to convert the nutrition information from millilitres to grams, to enable comparison to the per 100g nutrient target

Category	Definition	Proposed target	Stakeholder views	Partnership secretariat response
Savoury snacks: Sheeted and reformed snacks	Starch-rich materials (e.g. corn, maize, wheat, rice, potato flour) or legume flours used to make a dough, which is then reformed or sheeted to thin, uniform dimensions and cut to form the snack and fried or baked. Sold as ready-to-eat.	**Sodium** 520mg/100g	Broad support Definition, included or excluded products – supported as it will improve clarity where manufacturing method, structure and seasoning differ from extruded products. Further clarity on classifications i.e. explicit clarification of how sheeted crackers are treated. Expand the exclusion criteria to include the Savoury Biscuits category. Clarity – separation of products will likely reduce misclassification and improve integrity of sodium monitoring. Clear guidance is welcomed to support consistent report and meaningful comparison across manufacturers. Technical constraints – consideration of the functional role of sodium in flavour delivery and sensitivity of product formulation. Clearer categorisation between sheeted crackers and higher sodium sheeted snack products would support realistic target application and ensure technical feasibility.	Exclusions updated to specify savoury biscuits categories.
Pizzas with cured meat toppings	Commercially produced pizza dough, with cured-meat toppings (may also include vegetable, cheese, meat, fish or alternatives toppings) which only requires cooking or re-heating (i.e. no construction). Pizzas without cured meat toppings (as defined in 9.2) are excluded. Includes chilled and frozen varieties.	**Sodium** 550mg/100g	Broad support Disaggregation – supported as it is likely to improve fairness and interpretability and there is comfortability achieving this target going forward. Definition – requires further clarity, clarification on mixed topping pizzas (e.g. 'meat lovers' containing both cured and non-cured meats). Add bread rolls with pizza toppings as an Exclusion. Proposed target – reasonable single value across this sub-category Technical constraints – suggestion for saturated fat to increase to 5g/100g to account for additional saturated fat contributed by cured meat. Need to consider that strict guidelines may lead to customers perceiving the product as just a base. Should be noted that chicken as a topping (where cooked chicken is purchased externally) is injected with brine, and will align more to a cured meat.	Mixed topping pizzas are included as per the definition. Inclusions updated to note uncured meats may be present on a cured meat pizza. Exclusions list updated to list bread rolls with pizza toppings. Data doesn't support a higher saturated fat target by topping type.

Category	Definition	Proposed target	Stakeholder views	Partnership secretariat response
Pizzas with all other toppings	Commercially produced pizza dough with toppings (vegetable, cheese, meat, fish or alternatives) which only requires cooking or re-heating (i.e. no construction). Pizzas with cured meat toppings (as defined in 9.1) are excluded. Includes chilled and frozen varieties.	**Sodium** 450mg/100g	Broad support Definition – needs to clarify whether the sub-category excludes any cured meat inclusion entirely and how 'mixed topping' products are treated Proposed target – broadly supported for 450mg/100g Technical constraints – ingredient sodium contributions, dough handling impacts. Some factories may externally purchase all ingredients and may have little influence over the sodium level of the finished product.	Exclusions list updated to list bread rolls with pizza toppings. Definition clearly excludes pizzas with cured meat toppings.
Savoury and sweet biscuits: Sweet biscuits	Commercially prepared sweet biscuits, made with or without added flavourings, chocolate, fruit or nuts.	**Sodium** 280mg/100g	Mixed views Proposed sodium target – clear evidence is required of category contribution to sodium intake and baseline sodium. Recommendation for either setting sub-category specific targets informed by baseline data or confirming 280mg/100g represents a realistic yet stretch target. Current proposed target is too low meaning products would experience a noticeable taste difference and may reduce consumer acceptance. Alternative targets of 340mg/100g, and 400mg/100g are proposed. Definition – introduce practical sub-categories (e.g. plain sweet biscuits, cream-filled, wafer/finger biscuits) and/or provide clear examples to avoid unintended inclusion of dessert-style items. Exclude salted caramel flavoured variants as salt functions as a characterising ingredient. Clarify cereal bars as current wording could be interpreted to include all muesli and snack bars.	Changes to inclusions: Remove cereal bars and include wafer biscuits. Include biscuit mixes. Excluded salted caramel as salt is a characterising ingredient. For dry mixes, the target applies to the product as prepared in accordance with the on-pack instructions. Distinct variations in sodium content observed when data segmented by biscuit type. Target increased to drive reformulation of high sodium varieties.

Category	Definition	Proposed target	Stakeholder views	Partnership secretariat response
Sausages: Chicken/Pork	Minced chicken and/or pork, encased in a skin, sold raw and requiring cooking before eating. Product must contain no less than 500g/kg of fat free meat flesh; and have a proportion of fat that is no more than 500g/kg of the fat free meat flesh content.	**Saturated fat** 6g/100g	Mixed views. Definition – segmenting sausages into subcategories is overly complex. Could establish a threshold of ">x% meat content" or specifying that categorisation should be based on the species with the highest percentage of meat content. Clarity is required on how mixed-meat sausages are treated. Proposed target – feasibility depends on fat trim, inclusion of skin and product style. The grouping pork and chicken sausages needs to consider the following: saturated fat content of pork sausages is closer to beef than it is to chicken; pork and beef sausages are manufactured with similar ratios and chemical lean (CL) can be controlled, whereas chicken has no CL rating. Technical constraints – Includes maintaining texture/juiciness and bite when lowering fat, managing cost impacts and ensuring product performance across cooking methods. Need to consider the CL of sausages and the implications of organoleptic properties of a sausage, and cost.	The available data does not support industry claims that the proposed targets are unachievable. For pork sausages, approximately 50% of products already meet the proposed 6g per 100g target, with compliant products observed across a range of price points. This demonstrates that reformulation to this level is technically feasible and already being achieved within the current market. Definition updated to specify that categorisation should be based on the species with the highest percentage of meat content.
Sausages: Beef/Lamb/Veal	Minced meat (beef/lamb/veal) encased in a skin, sold raw and requiring cooking before eating. Product must contain no less than 500g/kg of fat free meat flesh; and have a proportion of fat that is no more than 500g/kg of the fat free meat flesh content.	**Saturated fat** 8g/100g	Significant concern. Definition – generally clear, clarity required on how mixed-meat products and classification rules work. Proposed target – more realistic targets of 8.5g and 9g/100g of saturated fat suggested. Feasibility is sensitive to traditional product styles and fat content expectations. Cost is also a significant limitation given product is positioned as a affordable source of meat. Technical constraints – similar constraints to pork/beef sausages. Constraints also include maintaining sensory quality and texture at lower fat levels, raw material cost and availability of lean trims, and potential compensatory formulation changes.	The saturated target has been adjusted up to 8.5g/100g. For beef sausages, 55% of products will meet the proposed 8.5g/100g target which is closely aligned with the chicken/pork sausage category. Definition updated to specify that categorisation should be based on the species with the highest percentage of meat content.

Category	Definition	Proposed target	Stakeholder views	Partnership secretariat response
Sweetened yoghurt: Dairy alternatives	Sweetened yoghurt made from non-dairy ingredients, liquid or semi-solid.	**Sugar** 6g/100g	Broad support. Confirmation required on how products sweetened with non-nutritive sweeteners are classified to ensure consistency between inclusion and exclusion criteria. Single target may have feasibility implications across different bases, so the dataset would need to represent the full mix of bases and product styles. Challenges include maintaining taste and texture when reducing added sugars. Substitution with alternative sweeteners/bulking agents can create labelling, costs and consumer-perception considerations.	Update to clarify the exclusion of non-nutritive sweetened yoghurts with no added sugar, honey, juice concentrate, or other kilojoule-containing sweetener (may contain unconcentrated fruit for flavouring). Target increased to 7g/100g to align with target for mammalian yoghurt (which allows 4.7g for intrinsic sugar).

Table 4: Summary of proposed changes to existing categories

Food category / sub-category	Current target	HFP Proposed revision	Stakeholder views	Partnership secretariat response
Processed meat: Processed deli meat	**Sodium** 720mg/100g	Increase to 810mg/100g	Broad support. Revised target – Feasibility will vary by sub-type (e.g. Devon versus silverside). Revised target remains unsuitable for whole muscle corned beef, where the traditional curing process for corned beef results in an inherent sodium content of 900-1000mg per 100g in products. Consider adding 'canned corned beef' as an exclusion. Concerns – need to clarify if uncooked/raw products are in scope. Considerations include ensuring the scope and sampling frame reflects market mix, and managing trade-offs with shelf-life, safety and sensory quality. Several excluded products (ham, bacon, salami, mettwurst, kabana and other cured or fermented meats) sit outside the sub-category and is subject to clear dietary advice to limit consumption. Important to acknowledge that increasing sodium benchmarks risks normalising higher sodium levels in foods that contribute to population intake.	Note excluded products such as ham and bacon are in their own categories. Whole muscle corned beef has been excluded. Salami, mettwurst, kabana and other cured or fermented meats remain outside of the definition due to technical limitations related to food safety.
Savoury and sweet biscuits: Flavoured savoury biscuits, crackers and 'grain-cake' biscuits	**Sodium** 720mg/100g	Update sub-category name/update inclusions to cover new products.	Broad support. Inclusion/exclusions – revise the description to artisan crackers with dried fruit, nuts, or seeds (for instance, fig and walnut crackers)	Exclusions list has been revised to artisan crackers with dried fruit, nuts, or seeds (e.g., fig and walnut crackers).

Food category / sub-category	Current target	HFP Proposed revision	Stakeholder views	Partnership secretariat response
Savoury pastries: Dry pastries	**Saturated fat** 7g/100g	Increase to 7.5g/100g	Mixed views. Revised target – minor increase will not improve feasibility or incentivise manufacturers who were not able to meet the previous lower target. Target remains difficult for sausage rolls due to the functional role that fat has in dough, where too little fat compromised quality and resulted in dry, brittle products.	Revised to 8g per 100g, acknowledging technical challenges for quiches and sausage rolls. Revised target will require 54% of quiches and 29% of sausage rolls to reformulate. Technical limitations, unsaturated fats can only be partially substituted.
Savoury snacks: Salt and vinegar snacks	**Sodium** 810mg/100g	Lower to 740mg/100g	Broad support. Flavour profile of salt and vinegar products necessitates a certain level of salt. Reformulation beyond the proposed revised target would not be supported as it would begin to be detrimental to flavour profile. One submitter, who does not manufacture products in this category, indicated the revised target may be challenging for some manufacturers.	Progress with proposed changes.
Savoury snacks: Extruded and pelleted snacks	**Sodium** 720mg/100g	Increase to 810mg/100g	Broad support. Ongoing monitoring will be important. It is important to note reduction is difficult where potassium chloride replacement is not always possible. Request for products such as Soya Crisps and Rice Wheels to be inclusions. Important to acknowledge that increasing sodium benchmarks risks normalising higher sodium levels in foods that contribute to population intake.	Updates to inclusions: soya crisps, rice wheels
Soups	**Sodium** 280mg/100g	Lower to 265mg/100g	Significant concern. Technical constraints – many soups have reached lowest sodium threshold, with little incentive to engage in costly reformulation. The target would require a long timeline to implement and significant resources to achieve. The 265mg/100g target would make manufacturers have to use salt replacers, flavour modulators or other food additives. There is a concern further sodium reduction in soups may create an undesirable trade-off between sodium levels and complex ingredient lists. Stakeholders support maintaining the existing target of 280mg/100g. Other comments – additional reformulations may reduce taste acceptance and may result in greater use of table salt by consumers. NNPAS 2023 population intake data indicates the proportion of sodium derived from soup was 0.5%, among people aged 2 years and over, and 0.9% among adults aged 65 years and older – the lowest sodium contribution compared with other food categories in the PRP.	Note concerns from stakeholders that further sodium reductions are technically challenging. Implementing sodium upper limit to reduce the amount of sodium at the upper end of the product category, capturing 9% of products.

Food category / sub-category	Current target	HFP Proposed revision	Stakeholder views	Partnership secretariat response
Sweetened yoghurt: Mammalian	**Sugar** 12.5g/100g	Lower to 10.5g/100g	Significant concern. Definition – suggestion that category be definition be updated to all semi-solid sweetened and/or flavoured yoghurt, excluding plain yoghurts with no added sweeteners or flavouring. Liquid fermented drinks (kefir) to be excluded from the definition as it sits well below the proposed target. Add 'no added sugar products with non-nutritive sweeteners' and 'no added sugar products with fruit only' to the exclusions list. Clarify if fruit puree is considered as 'unconcentrated fruit'. In general terminology should align with the Food Standards Code. Technical constraint – reducing the sugar content requires significant investment and time in research and development. The proposal to reduce the target to 10.5g/100g remains challenging and unachievable by 2030. Each 0.5g reduction requires a significant level of reformulation. Removing sugar may involve using lactose hydrolysis or adding alternate sweeteners, thickeners or emulsifiers which introduce longer ingredient lists and complex formulations. Sugars contribute to flavour balance and mouthfeels. Other concerns – An alternative compromise is a midpoint of 11.5g/100g may present a more technically feasible target whilst still meeting consumer taste demands and optics of expectation for tightening. The 11.5g target would help retain interest in the HFP and show that industry is making progress. The higher proportion of sugars consumed in children aged 2-4 years is likely driven by higher overall yoghurt consumption, rather than by higher sugar content of the products consumed.	Support suggested target for 11.5g sugar per 100g. This reduction will be a reasonable stretch for industry and continue to support sugar reduction efforts. In addition, introduce an upper limit of 16 g per 100 g (approximately the 90th percentile of the category). This ensures that products with the highest sugar content (which may not have reformulated to the target) are specifically targeted for reformulation, maximising reduction potential. Increasing industry participation will also support population health outcomes. Definition updated. Liquid fermented drinks (kefir) moved to list of exclusions.

Food category / sub-category	Current target	HFP Proposed revision	Stakeholder views	Partnership secretariat response
Crumbed & battered proteins: Meat and poultry	**Sodium** 450mg/100g	Maintain current target. Update sub-category name/inclusions to **4.1 Meat and poultry and plant-based alternatives** to cover plant-based alternatives.	Broad support. Definition - broadly clear, however plant-based foods are an emerging category and consumption/contribution of nutrients is unknown. Setting strict nutrient targets may hinder industry participation. Inclusions/exclusions - one stakeholder recommends against the inclusion of plant-based proteins. Since it is an emerging category, plant-based food consumption and their contribution of nutrients (such as sodium) is currently unknown. Inclusion of pork products to be made clearer (pork schnitzels, schnitzel dippers, pork poppers and similar crumbed pork snack products). Suggested exclusions - crumbed and battered vegetables, entertaining style products (dim sims, spring rolls, arancini balls, croquettes, mozzarella balls and haloumi chips). Clarification of how crumbed rissoles, meatloaf-style products and similar items that contain a sausage-meat component should be classified. Technical constraints - reformulation requires change across multiple functional components (protein matrix, binder systems and coating/crumb) – additional development time may be required to achieve targets.	Maintain inclusion of plant-based alternatives. Target is achievable based on current products in the market. There are no strict nutrient targets, participation in reformulation program is voluntary. Inclusions updated to clarify inclusion of pork products. Exclusions updated to add crumbed and battered vegetables and entertaining products as suggested. Crumbed/battered rissoles were already explicitly included.
Gravies and sauces: Asian-style cooking sauces	**Sodium** 680mg/100g	Maintain current target (with updated sub-category name **6.4 Asian-style simmer sauces** and definition).	Mixed views. Definition – update the target to per 100g “as sold” to better reflect how sauces are typically used and for consistency with other targets. Revert definition to ‘cooking sauces’ description as stir fry sauces are not considered a ‘simmer sauce’ due to contrasting cooking methods. Additional consideration required in renaming ‘Gravies and sauces’ to ‘Sauces’, as ‘Gravies’ applies to only one sub-category. Inclusions/exclusions – use general, broad descriptions in response to ‘where typically the whole jar is used’ as the product may be sold in a pouch or tub. Add ‘Meal bases’ and ‘recipe bases’ which require only the addition of meat and vegetables as inclusions. Technical constraints - the functional role of sodium in flavour balance. The core flavour profile of this category is driven by high sodium containing ingredients including soy sauce and fish sauce so it may be technically challenging to achieve for some varieties. There are substantial sodium	Renamed overarching category to "Sauces" and removed general guidance on application of target. Changes to inclusions: Removed reference to stir-fry sauce. Expanded packaging types. Included ‘meal bases’ and ‘recipe bases' which require only the addition of meat and vegetables. Stir-fry sauces used in small amounts are not intended to be captured by this category. Those products come under 6.6 Thick pastes and sauces.

Food category / sub-category	Current target	HFP Proposed revision	Stakeholder views	Partnership secretariat response
			differences between cooking sauces labelled as simmer, stir fry, recipe base or meal pouch for consideration. Other concerns – proposed increase target for stir-fry sauces, a minimum of 1000mg/100g.	
Gravies and sauces: Other savoury Sauces	**Sodium** 360mg/100g	Maintain current target (with updated sub-category name **6.5 Pasta, Indian-style and other cooking sauces** and definition).	Mixed views Definition – contradictive to target description and may drive confusion. Further clarification required for shelf-stable 'meal bases', 'pour-over' versus 'cook-in' and concentrated pastes. Inclusions/exclusions – suggestion inclusions: 'meal bases' and 'recipe bases' Other concerns – need to consider breadth of products captured within this subcategory. Change from 'made up/diluted as per on pack instructions where applicable' to 'as sold'. Indian cooking sauces may encounter challenges in terms of varying serving sizes, recipe concentrations and sodium levels.	Concentrated pastes are not included (see exclusions and note the definition states that products within this category do not require reconstitution). Changes to inclusions: Included 'meal bases' and 'recipe bases' which require only the addition of meat and vegetables. Indian cooking sauces were already included in this category prior to the review. The changes to this category were for clarification only.
Savoury snacks: Vegetable, grain & other snacks	**Sodium** 450mg/100g	Remove category; absorb products into other savoury snack categories.	Broad support	Progress proposed changes.
Savoury snacks: Potato snacks	**Sodium** 500mg/100g	Maintain target, while updating sub-category name to **15.1 Potato and other vegetable chips** and expanding inclusions to other vegetable	Broad support	Progress proposed changes.
Ready Meals*	**Sodium** 250 mg/100g		It is not clear whether tuna-based ready meals are within the Ready Meals category. For these foods the sodium target of 250 mg/100 g is technically challenging in practice.	Shelf-stable tuna based ready meals were within the ready meals category. See *Shelf-stable rice/pasta with meat/poultry/ fish/ vegetables and/or sauce served as a meal*.

Food category / sub-category	Current target	HFP Proposed revision	Stakeholder views	Partnership secretariat response
*Food category identified by stakeholders to address			Due to external standards on sodium levels in tuna, manufacturers cannot reduce the salt content of the tuna itself. This may lead to manufacturers having to reduce the proportion of tuna in products and thus a reduction to omega-3 and protein intake. It is recommended that shelf-stable seafood based ready-meals be separated into their own category. Stakeholders recommend a sodium target of 360mg/100g to balance stretch and feasibility. Clarity is also sought about whether potato bake and cauliflower cheese is part of the ready meals category.	However, The Partnership Secretariat have made the decision to exclude shelf-stable rice/pasta with fish from the ready meal category due to the technical difficulties with achieving a sodium target which was not determined with those meals in mind. In addition, these meals are not a significant contributor to the ready meal category. Other ready meals containing fish (e.g. tuna mornay, tuna bake) remain included.

5. Feedback outside the scope of proposed categories

Beyond the consultation questions, stakeholders provided additional suggestions for improving the PRP and Partnership more broadly. The information provided by stakeholders outside the scope of the consultation questions is summarised below to provide a record of what was submitted. The Partnership Secretariat has not assessed the merits of these suggestions or confirmed whether the perspectives submitted are accurate.

Increase participation from food manufacturers to enhance public health impact

Both industry and public health stakeholders support the need for the Partnership Secretariat to engage the food industry through social media, press statements and web-based strategies to further encourage participation. Stakeholders considered it is important to acknowledge the technical limitations for reformulating certain categories and therefore encourage greater uptake by manufacturers who are not yet participating to achieve public health outcomes. Previous letters written to Chief Executive Officers of food manufacturers is welcomed and may be a timely investment to encourage participation.

Stakeholders considered that Government leadership of the Partnership can support industry participation and uptake of reformulation targets. However, strict nutrient targets and repeated tightening of targets may reduce industry participation especially in categories that have undergone reformulation for many years. More broadly, there should be progression towards dietary patterns consistent with national dietary guidance and World Health Organization reformulation benchmarks.

Strengthen governance arrangements

Public health stakeholders see an opportunity to review and strengthen governance led by independent public health expertise, prioritising scientific evidence and international best practice. One submitter considered the current governance model could benefit from a clear separation between policy setting and implementation. This submission also recommended a wide-scope independent review of food and nutrition governance, including reviewing the Healthy Food Partnership Executive Committee Terms of Reference, and identifying and responding to emerging issues in the food environment including food processing.

Evaluate the reformulation program against the logic model

One industry stakeholder recommended evaluating the program against the 'Overall Logic Model for the Healthy Food Partnership'. They considered the consultation paper did not adequately consider the long-term outcomes regarding the Australian diet aligning more to the Australian Dietary Guidelines, and ultimately the public health objective of reducing population intakes of key risk nutrients – sodium, saturated fat and added sugars.

They considered the PRP Review and Recommendations paper would benefit from more consistent reference relating to the long-term outcome metrics for sodium, saturated fat and added sugars.

Monitor the impact of the HSR mandate

Industry see value in monitoring changes over time about the levels of risk-nutrients in foods. In addition to the data presented in the consultation paper, it may be beneficial to measure food composition at the commencement of a HSR mandate (if this is to eventuate).

Consider upper limits of proposed targets and carcinogens in foods

One public health stakeholders suggested upper limits could be considered for certain food categories where further reformulation may be challenging.

Concerns about carcinogens associated with processed meats were also raised, including whether this may warrant stricter measures for this category, noting the associated health impacts.

6. Conclusion

Overall, stakeholder feedback indicates broad support for many of the proposed revisions to existing and new categories, with more substantive concerns concentrated in a small number of areas where technical feasibility, category definitions, or potential impacts were less certain. Industry stakeholders generally supported the direction of the proposed changes, providing detailed technical input to improve clarity and practicality, while public health stakeholders emphasised strengthening governance, enhancing public health impact, and aligning the Program with broader dietary objectives and international best practice.

The consultation also highlighted opportunities to strengthen participation, governance arrangements, and evaluation against the Program's long-term objectives, particularly in measuring progress against population-level dietary outcomes, including sodium, saturated fat and added sugars.

Stakeholder feedback to this consultation has informed refinement of the reformulation targets. Endorsement of the refined targets will now be sought.