

VOLUNTARY FOOD REFORMULATION TARGETS: SODIUM, SUGAR & SATURATED FATS

Healthy Food Partnership Voluntary Food Reformulation

Summary and Analysis of Public Consultation regarding Sodium, Sugar and Saturated Fats
Reformulation

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1. BACKGROUND AND CONTEXT

The initial Healthy Food Partnership Voluntary Food Reformulation Targets to be considered by stakeholders in the public consultation were developed by the Reformulation Working Group (RWG) across 2017-18. Detailed information about this process is included in the *Healthy Food Partnership Reformulation Program: Evidence Informing the Approach, Draft Targets and Modelling Outcomes* (the rationale).

The current report provides a summary and analysis of the public consultation regarding the proposed Sodium, Saturated Fats and Sugar targets.

Demographics of the respondents are reported along with a summary of responses regarding the reformulation agenda. The main section of the report provides a detailed summary and analysis of the feedback regarding the food categories identified for reformulation; including the definition of the food category and the inclusion and exclusion of items, perceived concerns and challenges for reformulation including potential technical constraints, and perceptions regarding the appropriateness of the timeframe for reformulation to occur.

2. DEMOGRAPHICS AND GENERAL QUESTIONS: SUMMARY AND ANALYSIS OF CONSULTATION

2.1 DEMOGRAPHICS

Thirty-one unique organisations/individuals participated in the consultation, providing 49 separate submissions. In total, there were 22 submissions that responded to one or more food categories, three provided general comments based on themes within the consultation that were not attributed to specific food categories and an additional one provided comments on the portion size questions only. Of the 31 participants, 15 reported they reside in, or that the organisation is located in Victoria, ten are from NSW, three from ACT, two participants are from WA and one respondent reported being from overseas. Submissions which provided consent to be published in an identifiable format have at times been specifically identified.

Where the analysis of submissions prompted the RWG to significantly revise the category definitions or target, further targeted consultation was undertaken with food companies with products in the relevant categories. These categories were: gravies and finishing sauces; soups; wet pastries; corn snacks; cakes, muffins and slices; breakfast cereals; soft drinks; muesli bars and sweetened yoghurts.

2.2 REFORMULATION: SUPPORT AND BARRIERS

Twenty-six respondents indicated that they support the reformulation (of sodium, saturated fat and sugar). Four Industry groups [including the Australian Industry Group (AiG) and Dairy Australia] and one member of the public do not support nutrient reformulation as a public health measure.

Many of the 31 participants provided information about the public health issues they associate with reformulation in general. The barriers to reformulation of specific food categories are described in Section 3, however the following is a summary of the general barriers identified by the participants in response to this item.

Responses from industry groups:

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- Public health: concern that reduction in sodium may compromise intake of five food groups and food and beverages associated with positive health outcomes (e.g. breakfast cereals, bread and flavoured milk) (AFGC; and other industry group);
- Public health: reformulation may unfavourably influence nutrient intake including reduced iodine, wholegrain, fibre and calcium and increased saturated fat and potassium (due to use as a replacement of sodium) (AFGC; Woolworths);
- Public health: increase in artificial ingredients (Woolworths);
- Public education is required to support consumer uptake of reformulated products (industry group);
- Food industry manufacturing structure may not allow companies to influence nutrient profile (industry group);
- Food service products: unclear if these are included/excluded;
- Negative public relations for industry if reformulation unable to be achieved (industry group);
- Cost involved in reformulation, R&D and sensory testing (industry group);
- Existing corporate reformulation requirements;
- Quality of data used to develop targets;
- Food safety (role of sodium in preservation);
- The timeline for reformulation may impact Industry's ability to reformulate and maintain consumer acceptability;
- Proposed a more flexible approach based on a proportion of the category meeting the targets; and
- Reformulation may adversely impact consumer acceptability and quality of target food groups impacting the commercial viability of parts of the food industry.

Responses from members of the public / organisations concerned about:

- Public health: increase in artificial ingredients;
- Public health: may compromise intake of five food groups (e.g. fruit and vegetables), food and beverages associated with positive health outcomes (e.g. breakfast cereals, bread and flavoured milk);
- Public health: reformulation may unfavourably influence nutrient intake including reduced iodine; and
- Food safety (role of sodium in preservation).

Responses from Member Association (DAA):

- Public health: sodium reduction as a concern in cystic fibrosis, chronic kidney disease and other vulnerable populations (especially those at risk of malnutrition).

Responses from National Services body (Dairy Australia)

- Public health: reformulation may compromise intake of five food group foods and increase discretionary food intake;
- Public health: reformulation may unfavourably influence nutrient intake including reduction in iodine intake due to salt reduction in foods; and
- Public health: increase in artificial ingredients.

3. FOOD CATEGORIES: SUMMARY AND ANALYSIS OF CONSULTATION

3.1 INTRODUCTION AND METHOD OF SUMMATION AND ANALYSIS

The RWG identified 36 food categories for consideration in the consultation. Five of these categories had both sodium and saturated fats targets proposed, and one of these categories had both sodium and sugar targets proposed.

The following tables show the food categories to be considered for reformulation, the observed mean of items in each category currently¹, the proposed target(s) at time of consultation, and the endorsed targets.

Table 1: Food categories identified for reformulation, observed Sodium mean and range of items in scope for each food category, draft targets (at time of initial consultation), and endorsed targets.

| Food Category | Observed mean (mg/100g) [range] of in scope items | Draft Sodium target (mg/100g) | Endorsed Sodium target (mg/100g) |
|--|---|-------------------------------|----------------------------------|
| Bread | 432.9 [381-876] | 380mg | 380mg |
| Flat breads | 674.2 [451-1020] | 450mg | 450mg |
| Breakfast cereals | 441.7 [363-590] | 360mg | Subcategory targets developed |
| Cheddar and cheddar style cheese | 734.8 [720-790] | 710mg | 710mg |
| Processed cheeses | 1415.8 [1300-1940] | 1270mg | 1270mg |
| Crumbed and battered meat and poultry | 614.9 [452-1050] | 450mg | 450mg |
| Crumbed and battered seafood | 425.6 [278-835] | 270mg | 270mg |
| Gravies and finishing sauces | 590.6 [454-1279] | 450mg | 450mg |
| Pesto | 1095 [722-1350] | 720mg | 720mg |
| Asian-style sauces | 1302.7 [697-2230] | 680mg | 680mg |
| Other savoury sauces | 497.3 [365-1654] | 360mg | 360mg |
| Pizza | 620.3 [470-1230] | 450mg | 450mg |
| Ham | 1207.7 [1006 – 2260] | 1005mg | 1005mg |
| Bacon | 1130.5 [1020 -1400] | 1005mg | 1005mg |
| Processed deli meats | 906.5 [724 – 1330] | 720mg | 720mg |
| Frankfurts and Saveloys | 1149.4 [912 – 1400] | 900mg | 900mg |
| Ready meals | 333.78 [251 – 780] | 250mg | 250mg |
| Sausages | 685.9 [545 – 990] | 540mg | 540mg |
| Plain savoury crackers and biscuits | 775.9 [631 – 1100] | 630mg | 630mg |
| Plain corn, rice and other 'grain-cake' biscuits | 311.0 [300 – 322] | 270mg | 270mg |
| Flavoured biscuits, crackers and 'grain-cake' biscuits | 967.2 [722 – 1690] | 720mg | 720mg |
| Dry pastries | 486.4 [505 – 721] | 500mg | 500mg |
| Wet pastries | 486.3 [405 – 743] | 360mg | 400mg |
| Potato snacks | 618.5 [501 – 1260] | 500mg | 500mg |
| Salt and vinegar snacks | 1057.3 [840 – 1750] | 810mg | 810mg |
| Extruded snacks | 935.5 [745 – 1360] | 720mg | 720mg |
| Corn snacks | 569.6 [370 – 897] | 360mg | 360mg |

¹ Based on retail products in the FoodTrack© database in 2017

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| Food Category | Observed mean (mg/100g) [range] of in scope items | Draft Sodium target (mg/100g) | Endorsed Sodium target (mg/100g) |
|-----------------------------------|---|-------------------------------|----------------------------------|
| Vegetable, grain and other snacks | 733.4 [470 – 1430] | 450mg | 450mg |
| Soups | 314.8 [281 – 886] | 270mg | 280mg |
| Cakes, Muffins and Slices | 434.4 [360 – 1186] | 360mg | 360mg |

Table 2: Food categories identified for reformulation, current observed Saturated Fat mean and range of items in scope for each food category, draft targets (at time of initial consultation), and endorsed targets.

| Food Category | Observed mean (g/100g) [range] of in scope items | Draft Saturated Fat target (g/100g) | Endorsed Saturated Fat target (g/100g) |
|-------------------------|--|--------------------------------------|--|
| Pizza | 5.1 [4.1 – 8.4] | 4g | 4g |
| Frankfurts and Saveloys | 7.6 [6.6 - 8.5] | 10% reduction for products over 6.5g | 10% reduction for products over 6.5g |
| Sausages | 9.2 [7.2 - 17.0] | 7g | 7g |
| Dry pastries | 8.2 [7.1 – 10.3] | 7g | 7g |
| Wet pastries | 7.8 [7.1 – 9.5] | 7g | 7g |

Table 3: Food categories identified for reformulation, current observed Sugar mean and range of items in scope for each food category, draft targets (at time of initial consultation), and endorsed targets.

| Food Category | Observed mean (g/100g) [range] of in scope items | Draft Sugar target (g/100g) | Endorsed Sugar target (g/100g) |
|---|--|--|--|
| Breakfast cereal - fruit | 28.41 [22.60 - 42.00] | 10% reduction for products over 25g, and a reduction in sugar to 22.5g for products between 22.5-25g sugar | Subcategory targets developed |
| Flavoured milk - Mammalian milk | 7.94 [0.30 - 11.40] | 9g | 9g |
| Flavoured milk – Dairy alternatives | 4.65 [0.30 - 7.40] | 4g | 5g |
| Muesli bars | 31.57 [25.10 - 49.80] | 10% reduction for products over 28g, and a reduction in sugar to 25g/100g for products between 25-28g | 25g/100g or at least a 15% reduction for products containing over 28.5g/100g |
| Soft drinks | 11.40 [10.10 - 16.70] | 10% reduction in sugar across defined products for products above 10g sugar | 10% reduction in sugar across defined products for products above 10g sugar |
| Beverages - Flavoured water, flavoured mineral water, soda water and iced tea | 6.20 [5.10 – 8.00] | 5g | 5g |
| Sweetened yoghurt | 15.80 [13.60 – 21.90] | 13.5g | 12.5g |

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For each of the 36 food categories, respondents were asked for feedback on five main questions:

- Is the definition appropriate? E.g. are there any other products that could be included or excluded from the definition?
- Are you aware of any technical constraints with meeting the reformulation target, in this timeframe, in this food category?
- Do you have other concerns or challenges associated with this reformulation target?
- Is the time frame suggested (4 years) to meet the target for this category, reasonable?
- To what extent are you considering implementing this category target? Responses to this question will not be published.

To determine recommendations, it was necessary to consider all aspects of feedback for each food category on balance, i.e. there are inter-relationships between the responses which require mutual consideration. For example, suggestions regarding inclusions of items under the definition of a food category (point one above) should be considered with potential technical constraints arising from this inclusion. Therefore, although this report includes summary tables which report findings across all food categories, discussion occurs category by category.

3.2 HIGH LEVEL COMMENTS ACROSS CATEGORIES

The submissions for sodium, saturated fats and sugars reformulation targets contained several 'themes', which the RWG provides a high-level response to here, and briefing summary notes in each of the respective tables.

Timeframe for implementation

Across all categories the RWG has proposed a four-year implementation period, to commence once targets are endorsed and announced. This is consistent with the timeframe for the previous Australian Food and Health Dialogue and similar to timeframes adopted in New Zealand. Alignment of targets with previous Food and Health Dialogue targets, 2010 National Healthy School Canteens Guidelines and New Zealand targets were put forward as reasons for a shorter implementation period, on the basis that work may well already be in progress. The RWG also notes (predominantly) industry feedback about the option of reformulation through incremental changes, each requiring a period of development, consumer testing, food labelling changes etc. and consultation feedback suggesting that a longer implementation period may be required. RWG has made the decision to set a single end point target, rather than several staged targets. This provides industry with the flexibility to determine how to best achieve the target through consideration of their own product development cycles, including for instance, any reformulation already in progress, and the degree of reformulation required. The RWG considers that four years provides flexibility for industry.

The RWG acknowledges that the ability of companies to reformulate to meet the targets within the timeframe will vary. Comments received about targets included potentially limiting new product development, consumer demand for 'indulgent' product lines that fall outside of targets, the importance of providing consumers choice and/or the existence of product options of varying nutrient levels. Overall, the Partnership aims to optimise the nutritional profile of foods, and within that, reformulation targets have been established for the reduction of risk nutrients in categories which are key contributors to population intakes.

The Partnership Reformulation Program aims to see all products in scope of the categories 'shift down' to meet the reformulation targets.

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As outlined in the [RWGs rationale paper](#) (released during 2018 consultation), reformulation targets have been established based on the available nutrient data and international comparisons, with all targets considered to be technically feasible based on the presence of comparable products already in the market. Sales weighted data has not been used.

Industry is encouraged to work with the Implementation, Monitoring and Evaluation Reference Group (IMERG) to share success stories throughout the reformulation period and to keep in close dialogue regarding implementation issues.

Reporting requirements

The progress report is proposed to be made to the IMERG at year two and after year four of implementation. Some submissions proposed that reporting begin after one year and be required annually to provide transparency and consideration of more stringent targets, or a mandatory approach, if progress is not apparent. However, the RWG believes that this would be too onerous and contrary to the voluntary nature of the Partnership's work, being mindful that in the first year there may be minimal reformulation to report. Additional reports create an extra task for companies implementing the targets, and effort would be better directed at reformulating.

A reporting template has been developed and provided to industry as an Excel spreadsheet for ease of reporting. The implementation and reporting periods will align with the end of financial years (i.e. 30 June 2022 and 30 June 2024).

Possible risks associated with the nutrient reformulation program

The public submissions process sought information about potential risks associated with the nutrient reformulation program. The identified potential risks to public health have been assessed by independent technical experts and the Department of Health. Separate risk assessment reports have been prepared and provided to the RWG to inform their decisions. None of the risks precluded nutrient reformulation of sodium, saturated fats or sugars as a population-level health initiative. Where potential risks to certain at-risk population groups have been identified, the risk assessment makes note of monitoring and management approaches. The risk assessments have been collated into a single report, available on the Healthy Food Partnership [website](#).

In relation to the review of the Health Star Rating system

Targeted consultation was conducted in February-March 2019 on selected categories for which the RWG proposed significant changes to definition or target. This period coincided with the release of the draft report on the independent review of the Health Star Rating system (HSR). One of the options put forward in that draft report is to recalibrate all of the 'cut-points' for sodium baseline points.

Reformulation to reduce sodium is an important population health initiative and it is not necessary to await the outcome of the HSR review to set reformulation targets. The outcomes of the HSR review are not yet known, and any changes to the HSR system will need to be approved by the Australia New Zealand Ministerial forum on Food Regulation (indicatively in late 2019), followed by an implementation /transition period. Waiting for the outcomes of the review before finalising reformulation targets would delay the reformulation initiative. In the event of a revision of the sodium cut-points, further alignment with the reformulation targets would necessitate a significant amount of work from the RWG, further delaying implementation of the PRP.

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The HSR cut-points were one of several factors taken into consideration when establishing the reformulation targets as described in the RWG's rationale.

3.3 SUMMARY AND ANALYSIS OF CONSULTATION ON DIFFERENT FOOD CATEGORIES

3.3.1 Category 1: Leavened bread

Definition: Products made by baking a yeast-leavened dough prepared from cereal flours or meals and water and bread mixes.

ENDOSRED TARGET: A reduction in sodium across defined products to 380mg/100g by 30 June 2024.

Inclusions

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, damper, hot cross buns, English muffins, includes gluten-free alternatives.

Exclusions

Savoury flavoured products (e.g. cheese and bacon or spinach or vegemite rolls/scrolls, garlic bread), flatbreads, breadcrumbs, individual ingredients for bread (e.g. flour, yeast), crumpets, scones, sweet breads including iced varieties, bread-like cakes (including but not limited to brioche, panettone and stolen), biscuits, crackers and breadsticks (e.g. grissini's).

Overview of responses:

There were 11 responses to the consultation questions regarding the 'Bread' food category. Eight indicated satisfaction with the current definition, however one expressed concern that it may be difficult to monitor items that are not required to provide a Nutrition Information Panel/Ingredients list (e.g. artisanal bakery products/supermarket in-store bakery). One respondent supported their affirmative position with recent findings that 20% of breads already on the market meet the target.

One (industry) respondent requested more information regarding the process of categorisation of items into food categories and two respondents queried the inclusion of artisanal breads (and one identified organic breads) into this category. Concern was raised that the reduction or replacement of sodium in these breads would unfavourably influence the taste, quality and authenticity of these items and could lead to more wastage and the inclusion of artificial ingredients. One participant also noted that products with 'Protected Designation of Origin' should be excluded (as per items in the 'Cheese' food categories).

Three responses reported that no technical constraints would influence reformulation of items in this category, whilst two indicated no concerns or challenges. Six responses indicated concern about technical constraints, and eight responses to the question regarding concerns and challenges for reformulation of items in the 'Bread' category were affirmative. These responses can be categorized into technical issues, food safety concerns, consumer acceptance, commercial viability and public health risks; although there is significant overlap across categories. Several indicated that sodium is vital in the manufacture of some breads due to the role of sodium-based raising agents. The role of salt as a preservative was commonly raised as a concern by respondents. It was noted that replacing salt with other preservatives could influence consumer acceptance through the inclusion of artificial ingredients and a shorter shelf-life. Other aspects of consumer acceptance raised as concerns for items in the 'Bread' category include negative influence on taste, texture, integrity, reduction in the range and variety of available options. In particular, a reduction in sodium in leavened breads (including gluten-free breads) may result in changes in preservation, structure and taste. White bread is more likely to be influenced than wholemeal and grain varieties. Public health risk concerns focused

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on the role of salt in bread for the provision of iodine. Although recent investigations have shown a reduced rate of mild iodine deficiency across the population, there are still concerns for pregnant and lactating women. Likewise, reduced options could further reduce the consumption of already under-consumed grains. Multiple respondents identified concern regarding whether reformulation would further reduce bread consumption (previous studies have shown a 20g decline in bread consumption in recent years). Participants also provided suggestions to overcome potential problems and these are summarized in the recommendations section below.

The George Institute for Global Health (public health) investigated the sodium target for breads using 774 items from this category as reported in the FoodSwitch database (as opposed to the FoodTrack database used to in the development of the target by the RWG). This investigation identified a mean sodium content that is higher in the products investigated via FoodSwitch. In addition, the public health organisation reports that 35% of products already meet the target. Furthermore, the proposed target is not set at a Health Star Rating (HSR) cut-point [the organisation notes the fact that both bread targets are below the UK 2017 sodium target and the previous Food and Health Dialogue (FHD) target]. The George Institute recommend that the target be set at 360mg/100g.

Seven of ten responses reported that the four-year timeframe for reformulation is not reasonable. However, most discussion relates to concerns and challenges identified in previous responses, e.g. shelf life, consumer acceptance etc. Industry reports that the timeline for reformulation will likely be extended by activities required to overcome barriers. The timeframe is likely reasonable for some items but not all, and an industry stakeholder proposes that an incremental roll-out of the targets could address this concern. Likewise it was suggested that companies be provided with the opportunity to reformulate a proportion of items within the timeframe with others to follow as concerns are addressed. Finally, three responses suggest the need to regulate the approach to reformulation if voluntary reformulation is not successful. If meaningful reductions are achieved, then further progressive reduction in the sodium target should be considered.

Summary of Recommendations for Food Category 1: Leavened Bread

It is important to consider the following recommendations are predominantly from participants that have responded unfavourably to the reformulation targets. They should be considered in the context of the data collected from all participants.

Table 4: (Leavened Bread) Consultation recommendations and RWG decisions

| Type of recommendation | Specific recommendation | RWG notes |
|-----------------------------|--|---|
| Provide further information | Provide more information about the criteria used to categorise items into food categories. | Definitions were developed for the RWG by the CSIRO, based on FoodTrack data and technical insights. Draft definitions were released as part of the public consultation in 2018. |
| Amend definition | Exclude artisanal and organic breads from reformulation. | Retain. These products have pushed in-market sodium levels higher, products can still reformulate. RWG considers that there is not a sufficient technical reason to exclude these products. |
| | Exclude items with 'Protected Designation of Origin'. | If a particular salt/sodium level is defined as part of the product formulation and identity then they may be excluded, however this is thought to be unlikely for breads. |

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| Type of recommendation | Specific recommendation | RWG notes |
|------------------------------|--|--|
| | | Imports are not excluded; the RWG notes that it may be difficult to influence the manufacture of imported products, but also that other countries are setting sodium reduction targets for products including bread. |
| Amend target | Reduce to 360mg/100g. | Retain 380mg target |
| Amend approach | Replace sodium with potassium-based raising agents. | RWG emphasises that industry has flexibility to implement according to their own internal product development cycles – this may involve incremental changes. |
| | Do not reformulate. | |
| Further consultation | Seek further feedback from industry, food technologists and consumers about successful approach. | |
| Monitor, evaluate and review | Consider impact of sodium reformulation on the intake of iodine, wholegrain, dietary fibre and other essential nutrients of at-risk populations. | <p>The impact on iodine fortification / dietary intake was considered as part of the risk assessment work (see separate paper). Ongoing monitoring of population level intakes of iodine would be prudent with regard to that program and any impact of the sodium reformulation. There are provisions for the level of iodine fortification to be increased if required.</p> <p>Other nutrient / population diet monitoring is also discussed in the risk assessment reports.</p> |
| Education | Communicate appropriate messages to health professionals and consumers regarding the need for reformulation, and the potential use of lemon, vinegar and herbs and spices as salt replacement. | Noted. |
| Timeframe | An increased timeframe may be required by some companies depending on the number of affected items. | Retain 4yr implementation period. |
| | Companies to nominate the proportion of products within their range for reformulation in four-year timeframe, with a view to reformulation of more items in their range after further investigation into feasibility. | RWG is proposing single end-point targets, and emphasises that industry has flexibility to implement according to their own internal product development cycles – this may involve incremental changes. |
| | Organisations to provide annual progress reports starting in 2019, in which potential challenges are identified to inform future requirements. If voluntary reformulation progress is not meaningful in terms of reduction in overall sodium in these items, government regulation should be enforced. If reductions are meaningful, | As consulted on, companies will be asked to report to the IMERG at 2yrs and after 4yrs. RWG acknowledge an interest in being able to report early successes of the Reformulation Program, but believe that companies who want to talk publicly about their progress will do so. |

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| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|--|-----------|
| | then target should continue to be reduced progressively. | |

3.3.2 Category 2: Flat bread

Definition: Products made by baking an unleavened or slightly-leavened dough prepared from cereal flours or meals and water.

ENDORSED TARGET: A reduction in sodium across defined products to 450mg/100g by 30 June 2024.

Inclusions

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

Exclusions

Flat breads with toppings, completely leavened breads (e.g. loaf bread, sweet breads, focaccia, buns), sweetened flat bread, crispbreads, dough and mixes.

Overview of responses

Eight of thirteen responses for the 'Flat bread' category indicated their satisfaction with the current definition. However, clarification was sought with regard to the exclusion of flat breads with topping (industry group) and pizza bases (Grains and Legumes Nutrition Council - GLNC), given they are similar in nutritional profile and often consumed in similar ways (e.g. with high-salt characteristic toppings). Similarly, a separate respondent sought clarity as to whether all flatbreads are excluded if they have toppings, and how flat breads that are part of meal kits are considered. Woolworths specifically recommended that tortillas and other flatbreads with a longer shelf life are excluded from the definition. A member of the public indicated concern about replacing salt with artificial food additives.

The Australian Food and Grocery Council (AFGC), a large industry group, state that the target of 450mg/100g is feasible for a reasonable proportion of the items within the food category, but for products at the higher end of the range of sodium content, the target may not be achievable without substantial unfavourable outcomes. In contrast, public health groups have identified the sodium target for this group as being too conservative. The submission from the George Institute for Global Health recommends a lower target of between 360-400mg. As described for the 'Bread' food category in the previous section, their investigation using FoodSwitch data suggests that this is a feasible target based on the proportion of items already meeting the target, and the mean sodium content of items currently available in the market.

There were eight responses identifying technical constraints in the 'Flat bread' category, and ten responses identifying a concern or challenge. Food safety, public health risk, consumer acceptance, technical issues and capacity were identified as topics of concern. The preservation role of salt was commonly raised by respondents, in particular this was raised as a concern for safety due to increased microbial activity. In addition, increased food spoilage and reduced shelf-life is also a concern if preservation is compromised which can lead to increased food wastage. As described in the previous 'Bread' food category, reducing salt in items in the 'Flat bread' category may also lead to reduced iodine consumption which is an important public safety concern.

The removal of salt may also influence the taste, palatability, product integrity and therefore acceptance by the consumer. Respondents also raised concern for the artificiality of products should

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salt be replaced by other ingredients. The DAA identified the role of salt in achieving elasticity in flat breads such as tortillas, and replacements such as potassium chloride may also influence consumer acceptance. Packaging requirements is also a concern for manufacturers, reduced shelf-life will require changes to the information to be provided to consumers about storage. Likewise, resealable packages are often used to preserve freshness in low-sodium items, but this change to packaging for all items in this category is not considered feasible. Gluten-free and refined white flatbreads were raised as having the most substantial technical challenges.

Eight of 11 respondents indicated that four years was not a reasonable timeframe to reformulate items in this food category. Many comments reiterated concerns and challenges identified above. In addition (as per the recommendations stated below), various respondents suggested an incremental approach to the rollout of reformulation targets, particularly for companies which have a wide range of products which fit within this category, and given the wide range of sodium content of items included in this category.

Summary of Recommendations for Food Category 2: Flat bread

It is important to consider the following recommendations are predominantly from participants that have responded unfavourably to the reformulation targets. They should be considered in the context of the data collected from all participants.

Table 5: (Flat bread) Consultation recommendations and RWG decisions

| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|---|--|
| Amend definition | Exclude tortillas and other flatbreads with a longer shelf-life (develop new category for these items). | RWG further explored the similarities between fresh and long-life flat breads, nutritionally and for manufacturing. It is acknowledged that the target will be more challenging for shelf-stable products, but is considered to be technically feasible. |
| | Clarify inclusion/exclusion of pizza bases, flat breads with topping and flat bread as part of meal kits. | <p>Topped items are excluded in line with breads, as the toppings may contribute additional sodium.</p> <p>Sodium levels in plain (untopped) pizza bases is comparable to the other included flat breads. RWG note that retail pizzas and certain individual products commonly used as pizza toppings have targets proposed so consider that it makes sense to include the plain bases.</p> <p>Clarify definition for inclusion of 'plain' untopped flat breads; untopped pizza bases, meal kit breads</p> |
| Further consultation | Seek further feedback from industry, food technologists and consumers about successful approach. | RWG is proposing single end-point targets, and emphasises that industry has flexibility to implement according to their own internal product development cycles – this may involve incremental changes. |

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| Type of recommendation | Specific recommendation | RWG notes |
|------------------------------|---|--|
| Monitor, evaluate and review | Consider impact of sodium reformulation on the intake of iodine, wholegrain, dietary fibre and other essential nutrients of at-risk populations. | <p>The impact on iodine fortification / dietary intake was considered as part of the risk assessment work (see separate paper). Ongoing monitoring of population level intakes of iodine would be prudent with regard to that program and any impact of the sodium reformulation. There are provisions for the level of iodine fortification to be increased if required.</p> <p>Other nutrient / population diet monitoring is also discussed in the risk assessment reports.</p> |
| Education | Communicate appropriate messages to health professionals and consumers regarding the need for reformulation, and the potential use of lemon, vinegar and herbs and spices as salt replacement. | Noted. Communication goes to implementation. |
| Timeframe | Increase timeframe for gradual reformulation approach. | <p>As consulted on, companies will be asked to report to the IMERG at 2yrs and after 4yrs.</p> <p>RWG is proposing single end-point targets, and emphasises that industry has flexibility to implement according to their own internal product development cycles – this may involve incremental changes.</p> <p>RWG acknowledge an interest in being able to report early successes of the Reformulation Program, but believe that companies who want to talk publicly about their progress will do so.</p> |
| | Companies should be able to nominate products within their range that can feasibly be reformulated within the timeframe, as well as those that will require longer and those that will not be able to be reformulated in order to meet the target. | |
| | Organisations to provide annual progress reports starting in 2019, in which potential challenges are identified to inform future requirements. If voluntary reformulation progress is not meaningful in terms of reduction in overall sodium in these items, government regulation should be enforced. If reductions are meaningful, then target should continue to be reduced progressively. | |
| Amend target | Reduce to 360mg | RWG note the comments about challenges for long-life products and that the 450mg target aligns with UK target. Based on FoodTrack data about 50% of products already meet this target. RWG recommends a target of 450mg/100g. |

Breakfast Cereal – sugar targets

Overview of responses

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Both sodium and sugar reformulation targets have been proposed for the ‘Breakfast cereal’ food category. The consultation invited feedback from respondents regarding both targets, and therefore some responses address both targets simultaneously (especially with regard to the definition of the food category).

Three of 11 respondents agreed the definition for the category is reasonable. Some respondents sought clarification and rationale regarding the inclusion and exclusion of items in this group. Multiple respondents also queried which products would fit under each of the descriptive sub-categories in this group. These comments are summarised in Table 3.

Table 6: ‘Breakfast cereal’ products and categories for which clarification has been sought

| Product/sub-category | Feedback provided |
|---|--|
| Processed bran (sub-category) | Products with added flour, sugar, sodium or emulsifiers should be included. |
| Processed bran (sub-category) | Comment: products in this sub-category could be 100% cereal grains but others may include other ingredients. |
| Untoasted muesli (sub-category) | Is bircher muesli included? |
| Untoasted muesli (sub-category) | Untoasted mueslis with additions should be included. |
| Untoasted muesli (sub-category) | All untoasted mueslis should be included. |
| Porridge | All porridge which is not 100% oats/other grains should be included. |
| Plain flakes (sub-category) | Are Corn Flakes included? |
| Plain flakes (sub-category) | Definition and inclusions/exclusions unclear. |
| Plain puffed grains (sub-category) | Are Rice Bubbles included? |
| Processed bran or oat products (sub-category) | Definition and inclusions/exclusions unclear (are All-Bran or Bran Plus included?). |
| Oat products designed to be consumed as a cereal (sub-category) | Unclear. Are flavoured oats sachets included? |
| Granola | Some granolas are intended to be eaten hot – are they included or excluded? |
| All items | All items that contain no artificial ingredients should be excluded. |

In addition to the multiple comments regarding the inclusion and exclusion of various items shown in Table 5, DAA also made a general recommendation to include ‘processed bran’ into the definition of the broad food category, i.e. “Breakfast Cereal: Ready to eat breakfast cereal: Commercial breakfast cereals made from flakes, puffed grains, processed grains, processed bran and fruit/flake mixtures with added ingredients, designed to be eaten cold, and not requiring further cooking or processing”. Sanitarium also suggest that extruded cereals be added to the description of inclusions for this food category.

Finally, two respondents urged that breakfast biscuits and beverages be considered for reformulation, although they shouldn’t necessarily be included in the ‘Breakfast cereal’ category. A government group (The Prevention, Population Health Branch and the Food Safety Unit of the Department of Health and Human Services, Victoria) suggested that breakfast beverages should be included in the appropriate beverages category (i.e. dairy-based or sugar-sweetened), and the Obesity Policy Coalition public health group encouraged the inclusion of the breakfast biscuits in the bakery category.

There were several concerns raised by respondents with regard to the reduction of sugar in this food category. A member of the public indicated that reducing sugar will likely lead to increased artificiality. This was supported by an industry member who also identified that increased artificiality

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may be costly and consumer acceptance may be low. They also state that the health implications of adding artificial sweeteners are uncertain. The AFGC also mentions that there are technical difficulties with reformulating breakfast cereals, particularly those with a sugar content under 25g/100g, and palatability of these items is likely to be adversely affected. Woolworths highlights that plain cereals without dried fruit or other ingredients to provide sweetness will be difficult to reformulate whilst maintaining consumer acceptability. Solubility is also influenced by sugar content, and can cause difficulty in reformulation. Woolworths also asserts the importance of sugar for taste and texture (particularly to facilitate cereals remaining crunchy after milk is added and to provide lubrication for “dough” being processed into extruded breakfast cereal products).

The AFGC asserts that it should be acknowledged that the industry has already made significant progress in reducing sugar content, and that further reduction may be difficult without affecting identity and acceptance by the consumers. If products are not accepted by consumers, organisations are at financial risk. Multiple industry groups raised concern that those companies that have already reduced sugar content are at a disadvantage compared to those which produce cereals with very high sugar levels (even with a 10% reduction, a very high sugar content cereal can still have a large amount of sugar). This would negatively impact competitiveness for the companies who will be required to lower the content further.

An industry group also noted the importance of breakfast cereals in providing grains in the diets of Australians, however consumption has gradually decreased. Reformulation could lead to a greater reduction in consumption which could negatively impact the health of the population.

A Government organisation recommended that the reformulation target should be aligned with the Healthy Food Choices and National Healthy School Canteens criteria for breakfast cereals, as well as UK targets (<20g/100 (for cereals without dried fruit) and <25g/100g (containing dried fruit). The UK targets specify a reduction of 20%. The George Institute for Public Health propose that a target of no more than 13.5g/100g be set for this food category. This is based on consideration of FoodSwitch data, the Food and Health Dialogue, UK targets and the Health Star Rating.

Generally, most respondents who agreed that the reformulation should occur for this food group indicated the four-year timeframe was reasonable. A member of the public reported that should the reformulation be mandated then it could be implemented in one year. DAA and GLNC also suggest that feedback from industry is required to understand a feasible timeframe for successful reformulation without compromising product safety, quality and consumer acceptance. The AFGC suggests that the proposed timeframe may not be feasible for some products and recommends that the program allow for companies to nominate products that could be reformulated in this time, those that would require longer, and those for which reformulation will not be achievable. In regards to the sugar target, the AFGC suggests that longer timeframes are required for reformulation to allow for gradual reductions so that consumers’ palates may slowly adjust.

Summary of Recommendations for Breakfast cereals

It is important to consider the following recommendations are predominantly from participants that have responded unfavourably to the reformulation targets. They should be considered in the context of the data collected from all participants.

Table 7: (Breakfast Cereal food category) Consultation recommendations and RWG decisions (Sugar)

| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|---|--|
| Amend definition | Separate into smaller sub-categories with individual sugar targets. | The category has been split into cereals with and without fruit. |

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| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|---|--|
| | Clarify inclusions/exclusions in sub-categories 'Plain flakes', 'Processed bran', 'Untoasted muesli' and 'Oat products designed to be consumed as a cereal' | Clarification in inclusions/exclusions |
| | Clarify inclusion/exclusion of bircher muesli, granola and porridge. | Clarification in inclusions/exclusions |
| Amend target | Reduce further. | RWG is proposing single end-point targets, and emphasises that industry has flexibility to implement according to their own internal product development cycles – this may involve incremental changes. |
| Further consultation | Further communication with industry/technologists to determine approach. | |
| Timeframe | Organisations to provide annual progress reports starting in 2019, in which potential challenges are identified to inform future requirements. If voluntary reformulation progress is not meaningful in terms of reduction in overall sodium in these items, government regulation should be enforced. If reductions are meaningful, then target should continue to be reduced progressively. | As consulted on, companies will be asked to report to the IMERG at 2yrs and after 4yrs. RWG acknowledge an interest in being able to report early successes of the Reformulation Program, but believe that companies who want to talk publicly about their progress will do so. |
| | A proportion of products in organisation's portfolio should be required to meet the target within the timeframe, whilst more time is allowed for them to achieve this for other items. | RWG is proposing single end-point targets, and emphasises that industry has flexibility to implement according to their own internal product development cycles – this may involve incremental changes. Retain 4yr implementation period |
| | Extend timeframe to allow for gradual reduction. | |
| | Reduce to one year. | |

Targeted consultation

The RWG conducted an additional targeted consultation in June/July 2020 on a revised food category definition and sugar target. The sugar target taken to the 2018 consultation was intended to be a blanket target for all ready-to-eat cereals. Responses to both the 2018 consultation and 2020 targeted consultation were considered, and the RWG agreed to develop breakfast cereal sub-categories and individual targets for sugar.

3.3.3 Category 3: Breakfast cereals with fruit

Definition: Commercial breakfast cereals with added dried fruit.

ENDORSED TARGET: A reduction in sugar across defined products to 22.5g/100g, and at least a 20% reduction for products containing over 28g sugar/100g, by 30 June 2026*.

Inclusions

Cereal products containing dried fruit, e.g. plain or flaked cereals with dried fruit (e.g. Sultana bran), muesli's with dried fruit. Products with both dried fruit and fruit puree are also included.

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Exclusions

Commercial breakfast cereals without dried fruit, plain or mixed flakes (e.g. , e.g. Weetbix, Corn Flakes), mueslis without fruit pieces, fruit-paste filled wheat pillows, granolas without fruit, cereal/wheat 'biscuits' (e.g. Vita Brits, Weet-Bix), clusters and oat products designed to be consumed as a cereal (e.g. oat sachets). Includes gluten-free varieties.

3.3.4 Category 4: Breakfast cereals without fruit

Definition: Commercial breakfast cereals without dried fruit. May contain fruit pastes/ purees. Products may contain coconut.

ENDORSED TARGET: A reduction in sugar across defined products to 20g/100g, and at least a 20% reduction for products containing over 25g sugar/100g, by 30 June 2026*.

Inclusions

Ready to eat breakfast cereals - plain or mixed flakes, mueslis without fruit pieces, fruit-paste filled wheat pillows, granolas without fruit, cereal/wheat 'biscuits' (e.g. Vita Brits, Weet-Bix), clusters and oat products designed to be consumed as a cereal (e.g. oat sachets). Includes gluten-free varieties.

Exclusions

Cereal products containing dried fruit, e.g. plain or flaked cereals with dried fruit (e.g. Sultana bran), muesli's with dried fruit.

8 Responses – public health: 4, Industry: 5

Response rate: 75%

1 respondents agreed with the target, 3 thought the target should be lower, 2 thought the target should be higher, and 3 provided qualified support.

Alternative targets suggested: 13.5g/100g (2 respondents); separate targets for cereals with added sugar vs those with fruit; 20g/100g for cereals without added fruit and 25g/100g for those with added fruit; Agree with the reduction in sugar across defined products to 22.5g/100g as it aligns with the NZ Heart Foundation Reformulation Program, and agree with over 27g/100g for the reduction part of the definition, but would prefer the percentage reduction to be 10% as was originally proposed; the original target was considered reasonable; Focus on Cereals above 25g/100g - however, does not support a 20% reduction.

A summary of the responses to the 2020 targeted consultation are below.

The George Institute requested the target be lowered to 13.5g/100g based on the high proportion of products already meeting this target, the difference between the FoodSwitch 33rd percentile and the proposed target, the FoodSwitch 33rd percentile (11.9g/100g) and comparisons to the UK targets. A number of respondents, including the Heart Foundation, an industry group and manufacturers proposed the breakfast cereal category be split into two subcategories with targets for cereals with fruit (as fruit contains both natural and added sugars), and cereals without fruit

Many respondents raised concerns regarding sugar reduction from a functional perspective. It is noted that sugar serves many purposes in cereals, including taste, texture (crunch after milk is added), appearance, freshness and bulk. Three respondents stated the 10% reduction was considered feasible, but not the proposed 20% reduction. One submissions cites case studies that have demonstrated that a 10% reduction in sugar or sodium can take a minimum of 2 years to deliver as

consumers take time to adjust to the new sugar or sodium levels before further rounds of reductions can be made. If progressed, Woolworths suggests that feedback provided by companies on the challenges experienced while working towards this sugar target is considered at the two year review.

Breakfast Cereal – sodium targets

The sodium target taken to the 2018 consultation was intended to be a blanket target for all ready-to-eat cereals. Responses to the initial consultation were considered, and the RWG agreed to develop breakfast cereal sub-categories and individual targets for sodium.

Overview of responses

Both sodium and sugar reformulation targets were proposed for the 'Breakfast cereal' food category. The consultation invited feedback from respondents regarding both targets, and therefore some responses address both targets simultaneously (especially with regard to the definition of the food category). The responses that addressed both targets can be found under 3.3.3 Category 3: Breakfast cereal (Sugar target). Comments addressing sodium have been summarised below.

The impact of sodium reformulation on food safety and consumer acceptance were the most commonly raised concerns and challenges raised by respondents for this food category. The GLNC and the AFGC provided feedback that there would be significant technical challenges associated with reducing sodium in this food category given its role in improving shelf life, sensory characteristics, taste and shape. The AFGC state that the role of sodium differs significantly across the wide range of products in this category, and that sodium targets may need to vary accordingly. They reference the New Zealand Heart Foundation as having four different targets for this category. DAA and Sanitarium support the classification of items in this food category into smaller sub-categories with different targets. In contrast, Obesity Policy Coalition public health group report that they cannot identify any technical constraints associated with the reformulation target and thus support it as is.

Multiple respondents encouraged the acknowledgment of the significant time and resource investment already made to reduce sodium in this food category. This was also raised as an indicator of the difficulty of further reductions in this category. DAA also reported that they were aware of some technical challenges associated with reformulation of items in this category and Sanitarium reported that during trials for the FHD they determined the reduction in shelf-life of reduced sodium Cornflakes and Ricies to be commercially unviable, and therefore suggest that the sodium target be increased. Consistent with this, another industry group report that the proposed reformulation would be unachievable for wheat biscuits as the biscuit would fall apart.

Table 8: (Breakfast cereals) Consultation recommendations and RWG decisions (Sodium)

| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|---|---|
| Amend definition | Separate into smaller sub-categories with individual sodium targets. | Individual sodium targets have been set for 3 sub-categories. Where appropriate, these were aligned with New Zealand Heart Foundation Targets. No target was set for oat based products, due to the already low average sodium content of these products and the current category spread. |
| | Clarify inclusions/exclusions in sub-categories 'Plain flakes', 'Processed bran', 'Untoasted muesli' and 'Oat products designed to be consumed as a cereal' | |
| | Clarify inclusion/exclusion of bircher muesli, granola and porridge. | |
| Amend target | Increase target. | Clarification in inclusions/exclusions |

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| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|---|---|
| Amend approach | Companies should be allowed to nominate products that could be reformulated in the four year timeframe, those that would require longer and those for which reformulation is not feasible. | RWG is proposing single end-point targets, and emphasises that industry has flexibility to implement according to their own internal product development cycles – this may involve incremental changes. |
| Further consultation | Seek feedback from industry to understand a feasible timeframe for successful reformulation. | As consulted on, companies will be asked to report to the IMERG at 2yrs and after 4yrs. |
| Timeframe | Extend timeframe. | RWG acknowledge an interest in being able to report early successes of the Reformulation Program, but believe that companies who want to talk publicly about their progress will do so. |
| | Reduce to one year. | |
| | Organisations to provide annual progress reports starting in 2019, in which potential challenges are identified to inform future requirements. If voluntary reformulation progress is not meaningful in terms of reduction in overall sodium in these items, government regulation should be enforced. If reductions are meaningful, then target should continue to be reduced progressively. | |

Targeted consultation

The RWG conducted an additional targeted consultation in June/July 2020 on three new Breakfast Cereal sub-categories and corresponding sodium targets.

8 Responses – public health: 4, Industry: 6

Response rate: 83%

1 respondents agreed with all of the targets, 7 agreed with at least 1 of the targets, 1 thought all of the targets should be lower and 1 thought all of the targets should be higher.

Alternative targets suggested:

Biscuits - 270mg/100g; 360mg/100g; include with flakes and puff as production methods are similar

Flakes and puffs - 180mg/100g; 450mg/100g

All others - 180mg/100g; 400mg/100g (align with NZ HF); 400mg/100g (interim target), progressing to a target of 360mg/100g by 2028.

3.3.5 Category 5: Plain cereal biscuits

Definition: 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.

ENDORSED TARGET: A reduction in sodium across defined products to 300mg/100g by 30 June 2026.

Inclusions

Plain cereal/wheat 'biscuits' (e.g. Vita Brits, Weet-Bix). Gluten-free, multigrain or high fibre unflavoured cereal biscuits.

Exclusions

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Cereal-containing beverages ('breakfast drinks'), 100% plain cereals (e.g. plain flakes, plain puffed grains/cereals, 100% natural bran, plain oats), products with added milk powder that are intended to be consumed only with added water (milk powder can be skim milk powder or dairy alternative, e.g. Uncle Toby's Oats Creamy Honey 50g), breakfast biscuits designed to be consumed without the addition of milk (e.g. Belvita Milk & Cereal Breakfast Biscuits), wheat based cereals not in biscuit form (e.g. All Bran), flavoured cereal biscuits (e.g. Honey Weet-Bix), mueslis, porridge and flavoured breakfast oats, breakfast cereals where the only grain is puffed or flaked rice and/or flaked or extruded corn (e.g. Rice Bubbles, Corn Flakes, Coco Pops, Crunchy Nut), other ready-to-eat breakfast cereals (i.e. those made from flakes, puffed grains, processed grains, and mixtures included in other subcategories (e.g. Just Right, Sultana Bran, Uncle Toby's Plus, Fruity Bites, Cheerios, Special K)).

Summary of responses

The Obesity Policy Coalition support the sodium target of 300mg/100g for this category. One company have provided qualified support for this target. They note that this target will be very challenging for some products in this category. Salt is required for the extruded components to expand during the extrusion process, and assists with flake adhesion during baking. Less salt will result in smaller flakes, affecting density and texture, and increased wastage during production and after packaging.

The George Institute proposed that this target is lowered to 270mg/100g (3 HSR baseline points) based on the high proportion of products already meeting this target (72.7%), the difference between the FoodSwitch 33rd percentile and the proposed target (20%) and HSR cut-points.

One submission noted that while the target may be achievable for some products in this category, it poses significant technical challenges for others, including reduced flake adhesion. Another submission states that the revised target is not technically feasible for a major biscuit in this category. Sodium is required for adhesion, and sodium in this products cannot be reduced below current levels with adding sugar to create adhesion. This product does not currently contain any added sugar. The other major player in this market is able to have lower sodium because they also use added sugar to aid in the adhesion of the flakes.

The RWG acknowledge that one particular product will be unable to meet the target due to technical limitations, however they have chosen to confirm the target at 300mg/100g to encourage the reformulation of other products for which sodium reduction is technically feasible.

3.3.6 Category 6: Plain puffed or flaked or extruded breakfast cereals

Definition: Plain puffed or flaked or extruded breakfast cereals, made from rice, corn, wheat, or other grains, without other ingredients (e.g. fruit, nuts, coconut)

ENDORSED TARGET: A reduction in sodium across defined products to 450mg/100g by 30 June 2026.

Inclusions

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).

Exclusions

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Puffed or flaked or extruded breakfast cereals with other ingredients such as fruit, nuts or coconut (e.g. Just Right, Sultana Bran, Special K Forest Berries), cereal-containing beverages ('breakfast drinks'), 100% plain cereals (e.g. plain flakes, plain puffed grains/cereals, 100% natural bran, plain oats), products with added milk powder intended to be consumed only with added water (milk powder can be skim milk powder or dairy alternative, e.g. Uncle Toby's Oats Creamy Honey 50g), breakfast biscuits designed to be consumed without the addition of milk (e.g. Belvita Milk & Cereal Breakfast Biscuits), mueslis, porridge and flavoured breakfast oats, other ready-to-eat breakfast cereals (i.e. those made from flakes, puffed grains, processed grains) and mixtures included in other subcategories (e.g. Fruity Bites, Weet-bix).

Summary of responses

The DA, the Obesity Policy Coalition, and major retailers, support the creation of sub-categories, based on the various functional roles salt plays in the manufacture of different cereal types.

All responses from industry were supportive of the revised target taken to targeted consultation of 500mg/100g. One company have observed that it isn't technically or financially feasible (due to decreased shelf life) to achieve Na levels below 400mg/100g as originally proposed (the original target taken to the 2018 consultation).

Responses from public health stated that the proposed target is too high. Dietitians Australian conducted a review of cereals in this category using the Coles and Woolworths websites and found only two products (both from the same manufacturer) would require reformulation to meet the proposed target. Based on their findings, they surmise that a lower than proposed target for puffed or flaked cereals is technically feasible and warranted to encourage further sodium reductions to benefit public health. The George Institute propose that this target is lowered to 180mg/100g (2 HSR baseline points) based on the high proportion of products already meeting this target (93.3%), the difference between the FoodSwitch 33rd percentile and the proposed target, and HSR cut-points.

The Heart Foundation propose lowering the target to 450mg/100g, based on their own analysis of products in the Foodtrack database, which found that only 25% of products exceed 500mg Na/100g. They also cite the Public Health England (PHE) progress report on reformulation, which found that the average sodium content of breakfast cereals (as a result of the PHE Reformulation targets) was 235mg Na/100g, with 94% of all cereals falling below 400mg Na/100g.

The RWG agreed to reduce the target to 450mg/100g, acknowledging that while there have been significant shifts since 2017, and manufacturers are beginning to reach the limits of what can be achieved, 450mg/100ml is a balance between what is achievable while continuing to drive change.

3.3.7 Category 7: All other ready-to-eat cereals

Definition: 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).

ENDORSED TARGET: A reduction in sodium across defined products to 270mg/100g by 30 June 2026.

Inclusions

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

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wheat pillows (e.g. Fruity Bites), flavoured cereal biscuits (e.g. Honey Weet-Bix), all other ready-to-eat cereals including those with other ingredients (e.g. Crunchy Nut Corn Flakes).

Exclusions

Plain puffed or flaked or extruded breakfast cereals, made from rice, corn, wheat, or other grains without other ingredients (e.g. Rice Bubbles, gluten free rice flakes, Corn Flakes, All Bran, processed bran, Weeties, quinoa flakes, Special K, Cocoa Pops), cereal-containing beverages ('breakfast drinks'), 100% plain cereals (e.g. plain flakes, plain puffed grains/cereals, 100% natural bran, plain oats), products with added milk powder that are intended to be consumed only with added water (milk powder can be skim milk powder or dairy alternative, e.g. Uncle Toby's Oats Creamy Honey 50g), breakfast biscuits designed to be consumed without the addition of milk (e.g. Belvita Milk & Cereal Breakfast Biscuits), toasted mueslis, porridge and flavoured breakfast oats, plain cereal biscuits (e.g. Weet-Bix).

Summary of responses

The Obesity Policy Coalition support the sodium target of 270mg/100g for this category, while the The George Institute propose that this target is lowered to 180mg/100g.

One company have indicated that they can meet the target for all of the products that make up their top 80% of sales, however for the remaining products, the revised 270mg/100g target is not feasible, stressing product taste and texture would be severely impacted.

Another three companies do not support this target. One notes that while it is achievable for some products, there are significant technical challenges for others, citing salt's adhesion properties, base ingredients that already contain salt, and expansion of extruded cereal components.

Another submission does not support the target of 270mg/100g, stating that this level of reduction is not feasible, and is not supported by consumption data. Cereals contribute to 2% of sodium intakes compared with bread at 12%. The target is also 33% lower than the FHD target, and the NZ Heart Foundation Target.

Woolworths does not support the blanket target of <270mg/100g. Whilst salt can be reduced from a technical perspective, the appearance, texture and resulting flavour may not be acceptable for consumers, particularly in some types of extruded cereals.

The RWG agreed to confirm the target at 270mg/100, with changes to the definition. In acknowledgement of the functional role of sodium in puffed or flaked or extruded breakfast cereals, all plain varieties are now included in category category 6: Plain puffed or flaked or extruded breakfast cereals.

3.3.8 Category 8: Cheese – cheddar and cheddar style

Definition: Mild, matured, tasty, extra tasty, vintage and other cheddar cheeses.

ENDORSED TARGET: A reduction in sodium across defined products to 710mg/100g by 30 June 2024.

Inclusions

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).

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Exclusions

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 Dairy Lea Cheddar cheese) and cheddar-flavoured cheeses.

Overview of responses

Eight of 12 respondents indicated they found the definition of this food category reasonable. There were concerns of increased artificiality which led to the suggestion that all natural, traditional and organic products be excluded from this category. Two respondents suggested the definition specify that items exclusive to food service are excluded from the category. Finally, Woolworths recommended that imported cheese should be considered in a similar way to 'Protected Designation of Origin' products.

DAA indicated their support of the proposed target given that most of the products they surveyed in a brief market assessment met the target. They noted that many items already replace sodium with other ingredients that do not compromise consumer acceptance (e.g. potassium chloride and ammonium chloride). Dairy Australia also made reference to the significant time and effort of manufacturers in reducing salt content in very high salt cheese products whilst maintaining safety, and consumer health and acceptance. However, in contrast to the DAA, they do not support the reformulation target due to concern that further reduction will be required and this will compromise safety and consumer acceptance.

The George Institute for Global Health have indicated that the target is too conservative and have suggested that 630mg/100g is achievable. This was based on the analysis of data from the FoodSwitch database, as described in previous sections.

As alluded to above, both the DAA and Dairy Australia identified concerns and challenges for reformulation due to the multiple roles of sodium as an ingredient in cheese items. Specifically, sodium is a preservative which controls water activity and therefore inhibition of pathogens, modulation of enzyme activity and starter cultures, aiding curd syneresis and for hydration of the curd/cheese casein network, controlling the growth of non-starter lactic acid bacteria and taste. The reduction of sodium in cheese has the potential to impact these processes/outcomes, thus presenting food safety concerns and reduced consumer acceptance. As per the recommendations below, DAA express that the sodium target for this category is still achievable without compromising taste and safety, whereas Dairy Australia believe reformulation will not be able to be achieved without a negative impact on these outcomes. The AFGC also expressed concern about the impact on consumer acceptance of reformulation. Woolworths state that the cost of testing consumer acceptance and shelf-life will present a challenge to many manufacturers, and it is difficult to impact the production of imported and specialty cheese.

In addition, the AFGC highlighted the association between cheese consumption and favourable cardiovascular health outcomes. It hypothesises that sodium plays an important role in this relationship and thus there are public health concerns regarding reformulation. Furthermore, health may be compromised if reformulation leads to poor consumer acceptance and thus reduced consumption, as cheese is an important source of calcium and other nutrients in the diet of the population. Likewise, Dairy Australia note that cheese is encouraged as part of the Australian Dietary Guidelines.

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Of those who agreed that the reformulation of 'Cheese – cheddar and cheddar-style' items, the AFGC recommends extending the four-year timeframe to allow industry to develop adequate technology and processes to reduce the sodium in these items without compromising consumer acceptance and food safety. Woolworths also expressed the need for a long timeframe for the reformulation of aged and mature cheese items in this category.

Summary of Recommendations for Food Category 8: Cheese – cheddar and cheddar style

It is important to consider the following recommendations are predominantly from participants that have responded unfavourably to the reformulation targets. They should be considered in the context of the data collected from all participants.

Table 9: (Cheese - cheddar and cheddar style cheese) Consultation recommendations and RWG decisions

| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|--|---|
| Amend definition | Specify that items exclusive to food service are excluded from the category. | The reformulation targets have been set at the retail level, using FoodTrack (supermarket retail product) data. The focus for monitoring will be on retail products. Notwithstanding this, products manufactured for food service are encouraged to try to meet the targets and companies may wish to make a corresponding pledge under the Food Service Pledge Scheme. RWG note that in many instances a same product is manufactured for both retail and food service channels. |
| | Imported cheese should be considered in a similar way to 'Protected Designation of Origin' products. | Imports are not excluded; the RWG notes that it may be difficult to influence the manufacture of imported products, but also that other countries are setting sodium reduction targets for products including cheese. |
| | Exclude all natural, traditional and organic products. | If a particular salt/sodium level is defined as part of the product formulation and identity then they may be excluded, however this is thought to be unlikely for cheddars. Natural / traditional / organic products are not excluded – manufacturers are best placed to individually determine how they may meet the reformulation targets while maintaining consumer acceptance of their products and associated standards / expectations. |
| Amend target | Reduce target to 630mg/100g. | 710mg was set as a sodium reformulation target under the Food and Health Dialogue, a process which involved industry roundtable meetings and technical input from cheese experts. The target was considered acceptable and technically feasible at |

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| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|---|--|
| | | <p>that time and was subsequently adopted as a reformulation target in New Zealand as well.</p> <p>RWG note that not all products met this target under the Food and Health Dialogue (implementation period March 2013-2017), although specific detail of the reason for this has not been forthcoming. An assessment conducted by the Heart Foundation in May 2016 showed that in September 2015 ~20% of products in this category were still are above the 710 target, although it should be noted that the formal implementation period had not yet concluded. More recent FoodTrack data used by the RWG still indicated that the target had not been fully met.</p> <p>Public Health England set a 2017 target for <i>Cheddar and other similar 'hard pressed' cheeses</i> of 700mg average and 800mg maximum sodium content; and a review in December 2018 found that the average content was down to 712mg across manufacturers and retailers, again indicating technical feasibility. The UK's top 10 sales weighted products all had 720mg/100g sodium at December 2018.</p> <p>RWG acknowledge the multifunctional roles of sodium in cheese, and that food safety is paramount. Challenges with mature and aged cheddars are also noted and contribute to the RWGs decision to not further reduce the target.</p> |
| Amend approach | Do not reformulate. | Noted |
| | Allow manufacturers to select 95% of their range for reformulation and allow the original sodium profile for the remaining 5%. | RWG is proposing single end-point targets, and emphasises that industry has flexibility to implement according to their own internal product development cycles – this may involve incremental changes. |
| Timeframe | Extend timeframe to allow for development of technology and processes required to meet the targets whilst also maintaining food safety and consumer satisfaction. | As consulted on, companies will be asked to report to the IMERG at 2yrs and after 4yrs. |

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| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|---|---|
| | Extend timeframe for aged and mature cheese items. | <p>RWG acknowledges that any mature / aged cheddar products which are just beginning the reformulation process may still be maturing at the 4 yr mark, and consumer acceptability testing may also not have been possible. Noting that the 710mg reformulation target is a continuation of the target set in 2013, RWG proposes a 4 year implementation period in line with all other categories which it is setting targets for, and which was the case under the Food and Health Dialogue.</p> <p>Aged and mature cheese products are not excluded but RWG recognises that the back-end technology takes more time. Industry is encouraged to report on any specific challenges and the extent of progress at the 2 and 4 year, with a view that reformulated products should be in production even if not yet on shelf.</p> <p>As consulted on, companies will be asked to report to the IMERG at 2yrs and after 4yrs.</p> |
| | Organisations to provide annual progress reports starting in 2019, in which potential challenges are identified to inform future requirements. If voluntary reformulation progress is not meaningful in terms of reduction in overall sodium in these items, government regulation should be enforced. If reductions are meaningful, then target should continue to be reduced progressively. | <p>As consulted on, companies will be asked to report to the IMERG at 2yrs and after 4yrs.</p> <p>RWG acknowledge an interest in being able to report early successes of the Reformulation Program, but believe that companies who want to talk publicly about their progress will do so.</p> |

3.3.9 Category 9: Cheese – processed cheeses

Definition: All processed cheese products; products manufactured from cheese and products obtained from milk, which is heated and melted, with or without added emulsifying salts, to form a homogeneous mass.

ENDORSED TARGET: A reduction in sodium across defined products to 1270mg/100g by 30 June 2024.

Inclusions

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

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other forms (e.g. Dairylea Fridge Sticks, Dairylea Cheddar Cream Cheese Spread). Products may be shelf-stable or chilled.

Exclusions

Hard or soft cheeses not processed in the manner 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).

Overview of responses

Nine of 13 respondents agreed that the definition for items include in the 'Cheese – processed cheeses' is appropriate. Comments from those who didn't agree include that natural, traditionally made and/or organic cheeses should be excluded (a member of the public), soy and other dairy alternative processed cheeses should be excluded due to a growing market for vegetarians/vegans, and it should be made explicit that items exclusive to food service are excluded from the definition. One manufacturer recommends that the definition be altered to be in line with the 'Processed Cheese' definition in the Food Standards Code (Std. 1.1.2-3).

Concerns, challenges and/or technical constraints were identified in 16 responses, whilst seven responses indicated that they could identify no problems with reformulation for this food category. As per the findings for the previous food category ('Cheese – cheddar and cheddar-style'), food safety, cost, capacity, public health risk and consumer acceptance were identified as concerns. Sodium plays a vital role in maintaining food safety in cheeses, and reduction will lead to reduced consumer acceptance due to taste and reduced shelf life. Dairy Australia and DAA specify the role of sodium in maintaining cheese structure, controlling protein break down, and inhibiting pathogen/microbial growth. Woolworths note they have reduced the sodium content of items previously in accordance with the FHD and comparisons with items with a higher sodium content indicate a substantial taste difference. In addition, when sodium is reduced, moisture and fat levels change and this impacts energy content, and in turn has ramifications with regard to public health. This is in addition to previously mentioned (for cheddar cheeses) public health concerns surrounding disease risk and inconsistency with the Australian Dietary Guidelines. DAA supports that there may be substantial challenges for reformulation of several cheese types and suggest that although replacement of sodium with potassium chloride and other non-sodium based minerals is possible, this will likely affect taste.

Dairy Australia reiterates that much higher levels of non-sodium emulsifiers are required than is sodium and this contributes to unfavourable changes in palatability, and highlights that it is not possible to reduce sodium in other cheese ingredients such as milk powders, butter and stabilisers. A member of the public also identified increased artificiality as an unwanted change of reformulation. Due to the concerns and challenges raised above, Dairy Australia does not support these targets and believe that they are unlikely to have a positive effect on population health.

The George Institute for Global Health suggest a lower sodium target of 810mg/100g based on their investigation using Food Switch data, which indicates that 53% of items already meet the proposed target. In addition, they note that the proposed target is not set at a HSR cut-point (810mg/100g is the closest lower cut-point). The proposed target is well above the UK 2017 and the FHD sodium target. This suggestion is supported by two public health groups (World Action on Salt and Health and Victorian Government department) support this recommendation by the George Institute.

Four participants indicated the reformulation timeframe was reasonable for this food category, and two indicated that it should be extended in order to allow sufficient time for reformulation that does not compromise food safety and consumer acceptance. Several respondents suggested companies

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provide reformulation progress reports, which should continue to inform changes to the timeframe as well as the target itself (e.g. reduce target if being achieved successfully, or increase target due to insurmountable challenges).

Summary of Recommendations for Food Category 9: Cheese – processed cheeses

It is important to consider the following recommendations are predominantly from participants that have responded unfavourably to the reformulation targets. They should be considered in the context of the data collected from all participants.

Table 10: (Cheese – processed cheeses) Consultation recommendations and RWG decisions

| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|--|---|
| Amend definition | Exclude natural, traditionally made and/or organic cheeses; Soy and other dairy alternative items should be included. | Definition to remain as drafted. Natural / traditional / organic products are not excluded – manufacturers are best placed to individually determine how they may meet the reformulation targets while maintaining consumer acceptance of their products and associated standards / expectations. Soy and dairy alternatives are remain excluded. The manufacturing processes used for these products are quite different, and the nutritional profile of the base ingredients can be very different. At the population level the dietary contribution of sodium from these products is very low. |
| | Explicitly state that items exclusive to food service are excluded. | The reformulation targets have been set at the retail level, using FoodTrack (supermarket retail product) data. The focus for monitoring will be on retail products. Notwithstanding this, products manufactured for food service are encouraged to try to meet the targets and companies may wish to make a corresponding pledge under the Food Service Pledge Scheme. RWG note that in many instances the same product is manufactured for both retail and food service channels. |
| | Reword definition so as to be consistent with Food Standards Code 1.1.2-3. | Agree, amended in definition for clarity and consistency. |
| Amend target | Reduce target to 810mg/100g. | 1270mg was set as a maximum sodium reformulation target under the Food and Health Dialogue for <u>chilled</u> processed cheeses, in a process which involved industry roundtable meetings and technical input from cheese experts. The target was considered acceptable and technically feasible at that time and was subsequently |

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| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|--|---|
| | | <p>adopted as a reformulation target in New Zealand as well.</p> <p>RWG note that the UK targets are significantly lower (800mg maximum value, 720mg for cheese spreads), but consider a target of 810mg to be too low relative to the current Australian market, notwithstanding that it appears to be technically feasible.</p> <p>RWG also note that many processed cheese products may be flavoured and/or aimed towards children, making this an important category for reformulation.</p> |
| Amend approach | Companies to nominate the products that could be reformulated within the proposed timeframe, those that will need longer and those that are not able to be reformulated to meet the target. | RWG is proposing single end-point targets, and emphasises that industry has flexibility to implement according to their own internal product development cycles – this may involve incremental changes. |
| | Consider reasons for low implementation of the same targets under the FHD program | <p>RWG note that not all products met this target under the Food and Health Dialogue (implementation period March 2013-2017), although specific detail of the reason for this has not been forthcoming.</p> <p>An assessment conducted by the Heart Foundation in May 2016 showed that in September 2015 over 50% of chilled processed cheese products were not meeting the maximum target of 1270mg; although some may have made the percentage reduction. RWG note that the formal implementation period had not yet concluded.</p> |
| Timeframe | Extend timeframe to allow adequate time to reformulate recipes, especially seasonal items; amend labels and source alternative technologies. | <p>Retain 4yr implementation period, including in light of this being a re-affirmed FHD target with respect of the chilled processed cheeses, applied to a slightly wider processed cheese category.</p> <p>As consulted on, companies will be asked to report to the IMERG at 2yrs and after 4yrs.</p> |
| | Extend to six years | |
| | Organisations to provide annual progress reports starting in 2019, in which potential challenges are identified to inform future requirements. If voluntary reformulation progress is not meaningful in terms of reduction in overall sodium in these items, | <p>As consulted on, companies will be asked to report to the IMERG at 2yrs and after 4yrs.</p> <p>RWG acknowledge an interest in being able to report early successes of the Reformulation Program, but believe that companies who want to talk</p> |

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| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|--|---|
| | government regulation should be enforced. If reductions are meaningful, then target should continue to be reduced progressively. | publicly about their progress will do so. |

3.3.10 Category 10: Crumbed and battered proteins – meat and poultry

Definition: Meat (e.g. beef, veal, lamb) and poultry (e.g. chicken, turkey) which have been coated with a crumb or batter.

ENDORSED TARGET: A reduction in sodium across defined products to 450mg/100g by 30 June 2024.

Inclusions

Schnitzels, garlic Kiev, nuggets, crumbed chicken, crumbed burger patties and crumbed/battered rissoles. May be whole or in pieces, fresh or frozen. Includes gluten-free varieties.

Exclusions

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, vegan/vegetarian alternatives, uncoated rissoles, crumbed or battered cheeses, seafood, nuts or other non-meat protein sources.

Overview of responses

Eight of ten respondents indicated they feel the definition for 'Crumbed and battered proteins – meat and poultry' is reasonable. However, Woolworths recommend the definition of 'savory additives' be clarified, as the use of term 'additives' may confuse manufacturers. They also query if garlic or cheese filled kiev and flavoured crumbed chicken (e.g. salt and pepper crumbed chicken burgers) are included. They recommend that all flavoured crumbed proteins or products with additional 'salty' ingredients, e.g. cheese or sauces, are excluded because the extra ingredients contribute additional salt. The Victorian government group (Food Safety Unit and Prevention, Population Health Branch) suggest that vegan/vegetarian alternatives should not be excluded from this category because many of these products are high in sodium, the UK 2017 sodium targets have a category for vegan and vegetarian meat alternatives.

The George Institute for Global Health recommended that the sodium target should be reduced further to 400mg/100g. As per previously described, this is based on consideration of FoodSwitch data, HSR cut-points and the UK 2017 sodium targets. This submission was supported by the World Action on Salt and Health public health group and the Victorian Salt Reduction Partnership.

Five responses indicated that the participant could not identify any technical constraints associated with sodium reformulation for items in this category, likewise two responders indicated that they saw no concerns or challenges with reformulation.

The role of salt as a preservative and for flavour were identified as technical constraints, with reduction resulting in reduced shelf-life or replacement with artificial ingredients. Woolworths query the viability of having the same target for the varied products which fit into this category. They state that many products contain sodium from both the marinade/brine in which the meat/poultry (which is used to prevent the meat from drying out), and from the bread crumbs. Woolworths is concerned

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that it is not feasible that the same sodium target has been set for small and large muscle meat (which require a significantly different amount of sodium to control moisture) and for cooked vs raw products.

Concerns and challenges identified by eight respondents could be categorised as; concerns for public health risk, consumer acceptance and capacity. One industry submission states that there is evidence that a reduction of sodium of more than 15% will be detected by consumers and therefore suggest a two-step reduction program. They also note some companies' inability to influence the formulation of foods that are imported. This is supported by the DAA's and an industry group's submission which encourage the incremental change in sodium content due to the taste change that is associated with reduced sodium. Woolworths agree that consumer acceptance is a concern and state that the process of reducing sodium will require consumer testing of products, and those that do not pass the taste-test will need to be reformulated and tested again. They express concern regarding the viability of this process. Consistent with concerns about the importance of reformulating items in this category slowly, three participants reiterated that the proposed timeframe should be extended. In contrast to this, the Food Safety Unit and Prevention and Population Health Branch (Victorian government) state that the reformulation may be able to be completed in a shorter timeframe given the target is in line with the Healthy Choices and National Healthy School Canteens guidelines and hence some companies may already be working towards reducing sodium content of their products.

Summary of Recommendations for Food Category 10: Crumbed and battered proteins – meat and poultry

It is important to consider the following recommendations are predominantly from participants that have responded unfavourably to the reformulation targets. They should be considered in the context of the data collected from all participants.

Table 11: (Crumbed and battered proteins – meat and poultry) Consultation recommendations and RWG decisions

| Type of recommendation | Specific recommendation | RWG notes |
|----------------------------------|---|--|
| Amend definition Amend target | That vegan/vegetarian alternatives should be included. | Suggestion noted, however RWG agree that these products remain excluded. These products have a different composition, and while range / consumption is increasing these are not yet a major dietary contributor (recall starting consideration of products contributing >1% to dietary intakes). |
| | Exclude all flavoured crumbed proteins or products with additional 'salty' ingredients. Clarify whether these are included: garlic or cheese filled Kievs - flavoured crumbed chicken e.g. salt and pepper crumbed chicken burgers, chilli crumbed chicken pieces or Southern Style crumbed chicken pieces | FoodTrack database shows a number of different crumb types on products, with varying sodium levels. Flavoured crumb products are included. Added 'salty' ingredient covered in re-worded exclusion text. Garlic filled Kiev is included but cheese filled is excluded (a savoury addition). |

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| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|---|---|
| | (in exclusions) Remove the term 'additive' from definition to avoid confusion. | Amend as per suggested text 'products with added savoury sauce, flavourings or additions (e.g. chicken parmigiana, ready meal of schnitzel with vegetables). |
| | Reduce to 400mg/100g. | <p>Noting the feedback, RWG considered the technical feasibility of a revised target of 400mg/100g sodium.</p> <p>Data submitted by the George Institute for Global Health for this category was used as a 'sense check' of the draft targets, and shows that a target of 400mg aligns more closely with the 33rd percentile, where as about 44% of the category already meet the 450mg target.</p> <p>Industry feedback about the different injection rates required to maintain moisture in poultry vs beef or pork; and meats with or without bone, was also noted. While a lower target may be feasible for poultry it would be harder for larger muscle meats. On balance RWG has decided to retain the 450mg target.</p> |
| Amend approach | Provide a two-step/incremental sodium reformulation to allow consumers to adapt. | <p>RWG is proposing single end-point targets, and emphasises that industry has flexibility to implement according to their own internal product development cycles – this may involve incremental changes.</p> <p>Further communication about the reformulation targets should be part of the implementation strategy, including to butchers in order to work towards parity between supermarket and other retail outlets.</p> |
| Timeframe | Reduce timeframe. | Retain 4yr implementation period. |
| | Organisations to provide annual progress reports starting in 2019, in which potential challenges are identified to inform future requirements. If voluntary reformulation progress is not meaningful in terms of reduction in overall sodium in these items, government regulation should be enforced. If reductions are meaningful, then target should continue to be reduced progressively. | <p>As consulted on, companies will be asked to report to the IMERG at 2yrs and after 4yrs. RWG acknowledge an interest in being able to report early successes of the Reformulation Program, but believe that companies who want to talk publicly about their progress will do so.</p> <p>Companies are encouraged to have an ongoing dialogue with IMERG – if they are finding that targets are not achievable due to technical reasons.</p> |

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| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|---|--|
| | | The reformulation program, like all activities of the Partnership, is voluntary. Consideration of mandatory targets or further targets beyond the 4 year period is out of scope for the RWG. |
| Technical issues | Different moisture-injection requirements for small/large muscle meats, in order to keep the meats moist. Suggest 'meat' (e.g. beef, pork) and 'poultry' should have different targets to allow for this. | See comments above against 'target'. RWG has on balance decided to keep a single category with a target of 450mg. |
| Technical issues | Cooked / par cooked / raw products – having the same target for these will be challenging as moisture is lost during cooking. | Noted. Sodium values under consideration are as per NIP. The FoodTrack database used to guide target development included pre- and par-cooked products so we believe the targets are achievable for all product types. |
| Amend definition | That vegan/vegetarian alternatives should be included. | Suggestion noted, however RWG agree that these products remain excluded. These products have a different composition, and while range / consumption is increasing these are not yet a major dietary contributor (recall starting consideration of products contributing >1% to dietary intakes). |

3.3.11 Category 11: Crumbed and battered proteins – seafood

Definition: Seafood which has been coated with a crumb or batter.

ENDORSED TARGET: A reduction in sodium across defined products to 270mg/100g by 30 June 2024.

Inclusions

Crumbed or battered fish, squid, prawns and all other seafood (e.g. fish fingers, fish fillets, crumbed calamari, salt and pepper variants). May be whole or in pieces, fresh or frozen. Includes gluten-free varieties.

Exclusions

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.

Overview of responses

Six respondents indicated they determined the definition for this food category to be reasonable. Clarification of some aspects of the definition was sought by Woolworths. As for the previous food category, the company suggests the term 'additives' not be used so as to avoid confusion. They also propose that 'savory additives' is not an accurate description of the example provided 'battered fish

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with vegetables', and suggests that the description be changed and products with 'added sauce, flavourings or other additions e.g. fish based ready meals of crumbed fish in sauce', be excluded. Various suggestions were made by respondents with regard to items to be included or excluded. One industry submission suggests the exclusion of croquettes and fish that has been partially or lightly crumbed but can have crumb added during preparation. Woolworths recommend that only fish be included in the definition and all other seafood be excluded because for the latter, sodium based mineral salts are commonly added for optimisation of shelf-life and product quality. They also recommend the exclusion of battered fish and seafood, or re-categorisation of these items with a higher sodium target. This is due to the role of sodium bicarbonate for leavening of the batter. An industry group have recommended the exclusion of 'salt and pepper' variants of items in this category.

The George Institute for Global Health agree that the target for this food category is achievable (based on FoodSwitch data and comparison of the target with UK 2017 sodium target and the HSR cut-points). This response is supported by the World Action on Salt and Health public health group. In contrast, Woolworths suggest increasing the target to 450mg/100g for a separate category which includes crumbed or battered seafood (or limiting the category to crumbed fish only).

The most commonly identified concern for reformulation in this category is the impact on taste. Woolworths is concerned about reducing the sodium target of crumbed and battered seafood to a level where flavour and therefore consumer acceptance is affected. This could lead to an overall reduction in the consumption of fish and seafood which are associated with positive health outcomes. These items are convenient options for many families to optimise seafood consumption, and a lack of skill in preparing and cooking fish has been identified as a major barrier to consuming fish and seafood. In addition, some companies import these items and therefore do not have the capacity to influence sodium profile.

DAA acknowledge the difficulty of the reducing salt content of these items without negatively impacting consumer acceptance. Suggestions to overcome this concern are to make reductions in a stepwise manner, and to allow a longer reformulation period so as to test consumer acceptance of items as the sodium is reduced. However, this will result in significant increases in workload, time and cost related to resourcing, packaging and sensory studies. The DAA also raise the concern that reductions in sodium content of these types of products may not have an impact on sodium intake because consumers can choose to add salt at home. DAA advocate for the communication of appropriate messages and education to health professionals and consumers. These should highlight the benefits and importance of food reformulation, including alternatives such as lemon, vinegar or herbs and spices as salt replacements.

With regard to the appropriateness of a four-year timeframe for reformulation of products in this food category, several submissions suggest either a longer implementation period or the need to make incremental reductions over a longer period of time. In contrast, a public health group (Victorian Government department) agree the timeframe is reasonable, particularly for items for which there is a FHD target set previously.

Summary of Recommendations for Food Category 11: Crumbed and battered proteins – seafood

It is important to consider the following recommendations are predominantly from participants that have responded unfavourably to the reformulation targets. They should be considered in the context of the data collected from all participants.

Table 12: (Crumbed and battered proteins - seafood food category) Consultation recommendations and RWG decisions

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| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|---|---|
| Amend definition | Remove the term 'additives' from definition. | Amend as for crumbed and battered meats, using words from submission. |
| | Clarification of the change descriptor 'savory additives'. | |
| | Include fish only, not any other seafood. | Feedback about shelf-life and the use of sodium salts is noted, but these product types are within the dataset used to set the target, indicating the target should be technically feasible. RWG retains the language and target for 'seafood' rather than fish only. |
| | Exclude croquettes, partially or lightly crumbed fish which can have crumb added during preparation, salt and pepper variants, battered fish and seafood. | Croquettes which are potato-based are excluded. RWG has further reviewed the types of products included in the FoodTrack database used to set targets, and it includes a wide range of these listed product types. As with other food categories, if a crumb is included in the package for adding during preparation, then this is considered to be part of the product, and will be reflected in NIP values – these products remain included in the category. Salt and pepper variants are a small subset of products, and other categories have 'salt flavoured' products included within them. RWG is satisfied with the definition as prepared in relation to these products and considers based on the available data that the target is feasible. |
| Amend target | Amend target: crumbed or battered seafood should be a separate category with a target of 450mg/100g. | Based on the data analysed, the target is considered feasible for crumbed and battered fish and other seafood. RWG confirms the recommended target of 270mg. |
| Amend approach | Make reductions in a stepwise manner and test consumer acceptance during the process. | RWG is proposing single end-point targets, and emphasises that industry has flexibility to implement according to their own internal product development cycles – this may involve incremental changes. Further communication about the reformulation targets should be part of the implementation strategy, including to fishmongers in order to work towards parity between supermarket and other retail outlets. |
| Education | DAA advocate for the communication of appropriate messages and education to health professionals and | This feedback is noted. HFP communication about consumption aligned with the Australian Dietary |

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| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|---|--|
| | consumers. These should highlight the benefits and importance of food reformulation, including alternatives such as lemon, vinegar or herbs and spices as salt replacements. | Guidelines, tips and tricks for adding flavour to food without salt, and the purpose of the reformulation program will include these type of messages. |
| Timeframe | Increase to six years. | Retain 4yr implementation period. |
| | Organisations to provide annual progress reports starting in 2019, in which potential challenges are identified to inform future requirements. If voluntary reformulation progress is not meaningful in terms of reduction in overall sodium in these items, government regulation should be enforced. If reductions are meaningful, then target should continue to be reduced progressively. | As consulted on, companies will be asked to report to the IMERG at 2yrs and after 4yrs. RWG acknowledge an interest in being able to report early successes of the Reformulation Program, but believe that companies who want to talk publicly about their progress will do so. |

3.3.12 Category 12: Gravies and sauces – gravies and finishing sauces

Definition: Gravies and finishing sauce products which are designed to be served over food upon serving or as it finishes cooking.

ENDORSED TARGET: A reduction in sodium across defined products to 450mg per 100g/ml by 30 June 2024.

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

Inclusions

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.

Exclusions

Salad dressings, mayonnaises, béarnaise and hollandaise sauces if positioned for use as a condiment (used in small amount to augment a food). Mustards, pesto, 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, rubs, marinades, Asian-style and other savoury sauces. Condiment sauces in meal kits (e.g. taco salsa). Recipe bases / meal base concentrates, dry flavouring sachets.

Overview of responses

Eight of 15 respondents indicated they were happy with the current definition for this food category. The seven who indicated they found the definition unreasonable were consistent in stating clarification was needed. However, they each identified different items for which there was ambiguity about inclusion or exclusion. The responses are summarised in the following dot points:

- Are powdered, reconstituted or ready to serve versions of products in this category included?
Need to consider concentration factors if this is the case.

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- Include mayonnaise and dressings (or develop separate category).
- Include condiment-style sauces (or develop separate category).
- Are items in a meal kit included (e.g. seasoning/sauces in a taco kit)?
- Clarification for definition of 'use as a condiment' and 'finishing sauce' items is required (is there a serving size amount that could be used to distinguish between the two).
- It is unclear if food service items are excluded.
- Consideration of how the product is used (i.e. added to items that are high in sodium or low-sodium profile items).
- The term 'Characterising ingredient' needs clarification.
- Are only items which require the addition of water included in the definition (as per the HSR).
- Woolworths notes that the already available 'low-salt' versions of products which contain less than 450mg/100g will now be obsolete if the sodium target is implemented.

DAA supports the feasibility of the reformulation target for this food category, citing evidence that there is a wide variability in the sodium profile of these items, but there are a substantial proportion of available products that already meet the target suggesting that this is achievable.

The George Institute for Global Health recommend a further reduction of the target to 360mg/100g. This based on an analysis of FoodSwitch data (mean and 33rd percentile), in which 67% of items were found to already meet the proposed target. The target is at the UK 2017 sodium target and is at the 5th HSR cut-point, whereas the reduced target of 360mg/100g would be consistent with the 4th cut-point.

Six respondents did not identify any technical constraints associated with the reformulation of items in this category, and one indicated that they could not identify any concerns and challenges. Food safety (and the role of sodium in preservation – reduces microbial activity by maintain the water activity in these items) was again the most commonly reported concern. If sodium is reduced then shelf-life will also need to be reduced which leads to artificial replacement ingredients being added, greater food wastage, and changes required for labels (cost and commercial viability concerns are associated with this requirement). Consumer acceptance was also a concern, due to sodium influencing flavour of these items, and companies have reported already trying to reduce the sodium in items and believe that any further reduction would result in a product that will not be acceptable for sale. The texture of items is also negatively influenced by an inadequate sodium profile. Companies also raise concern that if the sauces do not contain enough flavour due to reductions, then consumers may add salt after preparation which defeats the purpose of the program.

One manufacturer also noted concern that a reduction to meet the target could result in compromised product quality and identity. They state that the sodium level of the 'characterising ingredient' is acknowledged for the Asian sauces and pesto categories and query why this is not the case for items in the current food category. Another was concerned that in order to meet the target, characterising ingredients such as bacon pieces would need to be removed which would unfavourably impact the consumer acceptability. A company with a large number of items in this category that will need reformulation noted that this would need to occur gradually with food technology research required to achieve the target without compromising safety and consumer acceptance.

Cost is also a significant concern to manufacturers. Research and development required for reformulation, and changes to labelling incur substantial cost. Companies are concerned this will lead to reduced profitability, reduced funds for product innovation and/or increased cost for consumers.

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Some companies do not have the capacity to reformulate the items due to separate ingredients being sourced from overseas companies that cannot be influenced by the Australian manufacturers.

Six of 13 respondents indicated that the four-year reformulation timeframe is adequate for this food category. Others suggested an increased timeframe (up to six years) or that companies be allowed to nominate items to be reformulated in the four-year timeframe but then be permitted to have an extended period of time for the reformulation of other items.

Targeted consultation responses

In response to the request for further feedback on gravies and finishing sauces, and the revised lower target of 410mg, the Department received the following information from 4 businesses. Only Woolworths has agreed to be identified / published. One company supports the lower target. One company responded that the lower 410mg target would be a significant challenge in the four year timeframe, and suggest a six year implementation timeframe would be required.

One company questioned the data provided by the George Institute that was used to support the reduced target. Their own market assessment of products in the category (not just their own) identified 99 products (vs 287 by TGI; and originally 114 from FoodTrack)

- Mean sodium content of the set of 99 products: 489mg (vs mean of 391mg cited by George Institute)
- 43% of products currently meet the 450mg target, requiring reformulation of 57% of the market
- 27% of products currently meet the 410mg target, requiring reformulation of 73% of the market

They also noted that 450mg aligns with the UK target; and that they supported the 450mg target previously proposed.

Woolworths do not support the 410mg target, but do support the 450mg target as achievable in Australia and New Zealand, and aligned with the UK target.

Summary of Recommendations for Food Category 12: Gravies and sauces – gravies and finishing sauces

It is important to consider the following recommendations are predominantly from participants that have responded unfavourably to the reformulation targets. They should be considered in the context of the data collected from all participants.

Table 13: (gravies and finishing sauces) Consultation recommendations and RWG decisions

| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|---|--|
| Amend definition | Express nutrition target as 100g or 100ml as appropriate. Concentration factors should be considered if dry, powdered or reconstituted items are included/excluded. Recipes/preparation instructions need to be considered. | Target is per 100g /ml of product as made up/consumed, in line with the on pack instructions. Any dry products are to use sodium values based on 'as prepared' to pack instructions. RWG note the feedback that some thicker sauces are sold with grams weight – target is therefore as mg/100g. |

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| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|--|---|
| | Include mayonnaise and dressings (in this category or as a separate category with a different target). | These product types are compositionally different, so excluded from this category. |
| | Include condiment style dressings (in this category or separate). | Mayonnaise and salad dressings are low contributors to population level sodium intake based on ABS data, likely also influenced by small serving sizes. As such no target has been set based on the RWG approach of targeting products contributing >1% to population intakes. |
| | Define condiments where listed as an exclusion | |
| | | Definition (excludes condiments) clarified. |
| | Specify that food service items are excluded. | The reformulation targets have been set at the retail level, using FoodTrack (supermarket retail product) data. The focus for monitoring will be on retail products. Notwithstanding this, products manufactured for food service are encouraged to try to meet the targets and companies may wish to make a corresponding pledge under the Food Service Pledge Scheme RWG note that in many instances a same product is manufactured for both retail and food service channels. |
| | Clarify the term 'characterising ingredient'. | 'Characterising ingredient' has a specific meaning in the Food Standards Code and use here may be causing confusion. On reflection it is not required / does not add to the definition, so RWG has amended (deleted) from the high level category definition (see below for revised definition). |
| | Only items that are prepared using water should be included in this definition. | <p>RWG notes that this issue is reflective of HSR 'as prepared' discussions. Reformulation target is for an absolute reduction in sodium, for products as made up. This includes products made up with milk or water.</p> <p>The recent HSR 'as prepared' decision means that some products made up with milk will need to display HSR 'as sold'. The reformulation target may therefore have minimal bearing on their HSR.</p> <p>The RWG notes an alternate approach would be to set different sodium reformulation targets for liquid, condensed and dry sauce products;</p> |

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| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|---|--|
| | | however there would still be different levels of concentration within these, depending on how much liquid is to be added to Xg of product. As this approach is not recommended. |
| | Clarify whether items in a meal kit are included (e.g. seasoning/sauces in a taco kit) | These are excluded. Definition amended to make clear (see above). |
| Amend target | Reduce to 360mg/100g. | <p>The draft target of 450mg aligns with the UK target.</p> <p>FoodSwitch (George Institute) data show 66% of products already meet the 450mg target and thus proposed a 360mg target. However the FoodTrack data shows only 25% currently meet the alternate target of 360mg. RWG acknowledge the different collection methods and challenges of comparing different datasets.</p> <p>RWG considers that 360mg/100g is too low for this category, including with consideration to the magnitude of change required for the significantly higher products.</p> <p>While 450 and 360 align with current HSR nutrient cut-points, and effort has been made to align, these serve as a guide only.</p> <p>RWG notes feedback received that low sodium variants already exist.</p> <p>RWG sought further feedback about the feasibility of a revised 410mg per 100g/ml target; including with consideration to current product ranges and the comments and clarifications provided from the previous consultation round. The RWG decided to confirm the original target.</p> |
| Amend approach | Companies should be allowed to reformulate products gradually until the target is achieved or a 20% reduction is achieved (for items with a sodium profile much higher than the target). | <p>RWG is proposing single end-point targets, and emphasises that industry has flexibility to implement according to their own internal product development cycles – this may involve incremental changes.</p> <p>RWG would prefer to shift the whole food category towards a maximum sodium target, rather than a % reduction.</p> |
| | Companies should be allowed to nominate a certain percentage (suggestions of 80-95%) of their portfolio for reformulation within the timeframe, with an extended period allowed for the reformulation of remaining items. | |

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| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|---|--|
| Education | Provide clear instructions to manufacturers about how to calculate sodium content given confusion around dry (unprepared) vs liquid (prepared) targets. | Noted, see comments above about target as per 100g/ml as prepared to on pack recipes. |
| Timeframe | Extend to six years. | Retain 4yr implementation period. |
| | Longer than four years would be required to gradually make changes based on food technology research. | |
| | Organisations to provide annual progress reports starting in 2019, in which potential challenges are identified to inform future requirements. If voluntary reformulation progress is not meaningful in terms of reduction in overall sodium in these items, government regulation should be enforced. If reductions are meaningful, then target should continue to be reduced progressively. | As consulted on, companies will be asked to report to the IMERG at 2yrs and after 4yrs. RWG acknowledge an interest in being able to report early successes of the Reformulation Program, but believe that companies who want to talk publicly about their progress will do so. |

3.3.13 Category 13: Gravies and sauces – pesto

Definition: 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 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.

ENDORSED TARGET: A reduction in sodium across defined products to 720mg/100g by 30 June 2024.

Inclusions

Pestos used during cooking or intended as stir-through (e.g. basil pesto, sundried tomato pesto). Includes both shelf stable and chilled varieties.

Exclusions

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.

Overview of responses

Nine of 12 respondents expressed their satisfaction with the definition for this food category. There is some feedback seeking clarification of the items to be included and excluded. A member of the public recommends that natural, traditional and organic products in this category should be excluded. Other respondents queried the inclusion of pesto-style dips, pesto stir-through sauces and deli-sold dips.

The George Institute for Global Health recommends a further reduction of the sodium target to 540mg/100g. This is supported by multiple respondents and is based on FoodSwitch data, UK 2017 sodium targets and HSR ratings.

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DAA and an industry group support the proposed reformulation target but acknowledge the difficulty of reducing sodium in these products without compromising food safety and product taste/quality. DAA states that the wide variety of sodium profile in this food category suggests that it can be possible to achieve the target, although the abovementioned industry group highlight that variations in the products impact the sodium required for food safety meaning that it may be more difficult to reduce sodium in some products than others. Another respondent suggested that the differences across items should mean that companies be allowed to specify a number of products to be reformulated in the timeframe with other products being given a longer period of time to be reformulated.

There is concern that the characterising ingredients in these products contain a high level of sodium, and removal of these would compromise consumer acceptance. Likewise, feedback highlights that these products are often consumed in small amounts and reduction may not influence overall sodium consumption significantly. Consumers may also begin adding salt in preparation if the taste is unacceptable.

Most respondents determined that the four-year timeframe was reasonable, although some indicated that the rollout be incremental and that companies be allowed to select a proportion of the items to be reformulated within the four year period but allow extra time for all products in their portfolio to be reformulated. Two submissions including from AFGC queried the feasibility of reformulation in this category being achieved in the four-year timeframe.

Summary of Recommendations for Food Category 13: Gravies and sauces – pesto

It is important to consider the following recommendations are predominantly from participants that have responded unfavourably to the reformulation targets. They should be considered in the context of the data collected from all participants.

Table 14: (Gravies and sauces – pesto) Consultation recommendations and RWG decisions

| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|---|--|
| Amend definition | Clarify inclusion/exclusion of pesto-style dips and stir-through sauces. | Pesto dips and stir through sauces are excluded. |
| | Exclude natural, traditional and organic items. | RWG considers that the sodium levels in some of these products may be reduced, without the need for artificial ingredients which would adversely affect the ability to make these claims. |
| Amend target | Reduce target to 540mg/100g. | Retain target 720mg target. RWG notes the sodium in parmesan cheese used in pesto will be a limiting feature for sodium reformulation. The pesto category is quite small, and the mean of products above target is over 1065mg. 540mg is considered too challenging. |
| | Set a reduction of 25% rather than absolute target. | |
| Timeframe | Companies nominate a proportion of their products for reformulation within the proposed timeframe with other products to be reformulated after. | RWG is proposing single end-point targets, and emphasises that industry has flexibility to implement according to their own internal product development cycles – this may involve incremental changes. |
| | Increase timeframe. | Retain 4yr implementation period |

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| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|---|--|
| | Organisations to provide annual progress reports starting in 2019, in which potential challenges are identified to inform future requirements. If voluntary reformulation progress is not meaningful in terms of reduction in overall sodium in these items, government regulation should be enforced. If reductions are meaningful, then target should continue to be reduced progressively. | As consulted on, companies will be asked to report to the IMERG at 2yrs and after 4yrs. RWG acknowledge an interest in being able to report early successes of the Reformulation Program, but believe that companies who want to talk publicly about their progress will do so. |

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3.3.14 Category 14: Gravies and sauces – Asian-style cooking sauces

Definition: 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 components of a meal and are 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.

ENDORSED TARGET: A reduction in sodium across defined products to 680mg per 100g/ml by 30 June 2024.

Inclusions

Sauces used during cooking (e.g. stir-fry sauces, satay simmer sauce). Includes both shelf stable and chilled varieties.

Exclusions

Curry powder (designed as a spice), sauces and condiments designed to be added at the table (e.g. wasabi, chilli sauce, sweet chilli sauce, soy sauce, fish sauce, oyster sauce,), curry pastes, rubs, marinades, finishing sauces, gravies, pasta sauces, Indian sauces, casserole and non-Asian rice sauces, recipe concentrates or meal base powders / sachets.

Overview of responses

Six of 15 respondents agreed with the proposed definition. Those who did not agree with the definition expressed the need for greater clarification around the definitions, inclusions and exclusions for this group. There appears to be substantial overlap between this category and 'other savoury sauces'. A member of the public provides the example of a Cashew Satay cooking sauce which could fit into either category. Woolworths states that the definition does not specify which Asian cuisines fall into this category. One industry submission suggests the inclusion of sodium-reduced soy sauces, but the exclusion of Asian-style pastes (concentrated form of stir fry sauce), as per curry pastes. They also suggest that the reformulation target should be stated as 'per serve' to acknowledge the addition of other ingredients. Two submissions also expressed confusion regarding the inclusion of powdered, reconstituted or prepared versions of a product, whilst an industry group were unsure about sauces exclusively used in food service and those added at the table (or in small amounts during cooking) are included. One suggested separate targets for dry and wet sauce/sauce bases. In addition, Woolworths suggests the definition for 'Asian style sauces' follows the previous FHD description which clearly excluded recipe bases or concentrates which require preparation with other ingredients (e.g. meat, vegetables, butter, cream). Addition of other ingredients can significantly change the nutritional profile of the product and result in unfair comparisons. This would also align to the ruling for the 'as prepared' rules for Health Star Rating which must now be based 'as sold'. The Food Safety Unit and Prevention and Population Health Branch (Victorian government) note that the Healthy Choices and National Healthy School Canteens guidelines have one target for both Asian-style and non-Asian sauces and the UK 2017 sodium targets have one category for 'all cook-in and paste simmer sauces'.

The George Institute for Global Health state that the target is feasible but could be set even lower at 630mg/100g, based on analysis of FoodSwitch data and consideration of the UK 2017 sodium targets and the HSR cut-points (680mg/100g is not one of the cut-points). A lower target is supported by two public health groups (World Action on Salt and Health and Victorian Government department). The Food Safety Unit and Prevention and Population Health Branch (Victorian government) highlights that

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the target is also set above the Healthy Choices and National Healthy School Canteens guidelines. However, the AFGC and other industry group query the achievability of the target in the four-year timeframe.

Food safety, food texture and taste are influenced by the inclusion of sodium in Asian sauces. Therefore, the reduction of sodium is likely to negatively influence consumer acceptance. An industry group state the importance of sodium in maintaining product identity. Multiple respondents identified the need to reduce sodium in a staged approach, to increase acceptance by consumers, however this requires significant company resources which limits viability. There is also a suggestion that companies be able to nominate a proportion of items within their portfolio for reformulation. Woolworths is not confident that sodium can be reduced to the target level without compromising consumer acceptance or commercial viability, particularly without replacing sodium with MSG. In contrast, DAA interprets the target to be feasible, but acknowledges the role of sodium in reducing water activity and thus microbial growth in these items.

Summary of Recommendations for Food Category 14: Gravies and sauces – Asian-style sauces

It is important to consider the following recommendations are predominantly from participants that have responded unfavourably to the reformulation targets. They should be considered in the context of the data collected from all participants.

Table 15: (Asian-style sauces) Consultation recommendations and RWG decisions

| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|---|--|
| Amend definition | State target as 'per serving' rather than 'per 100g. | The target is per 100g /ml as for other sauces. |
| | Align with FHD definition. | Clarifications made in definition |
| | Clarify inclusion/exclusion of powdered, reconstituted or dry sauce bases; and sauces used exclusively during food service, added at the table or added during cooking. | Applies to sauces used during cooking process; not those added at the table. Recipe bases and recipe concentrates are excluded. The reformulation targets have been set at the retail level, using FoodTrack (supermarket retail product) data. The focus for monitoring will be on retail products. Notwithstanding this, products manufactured for food service are encouraged to try to meet the targets and companies may wish to make a corresponding pledge under the Food Service Pledge Scheme RWG note that in many instances a same product is manufactured for both retail and food service channels. |
| | Separate dry and wet sauces into separate categories. | Dry spice / flavouring sachet are excluded. Target applies to wet sauces (or reconstituted if need be), but not meal bases. |
| Amend target | Reduce to 630mg/100g. | RWG considers that the target of 680mg is challenging but feasible and confirm this recommended target. |

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| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|---|--|
| | Reduce by 15% (but once below 680mg, further reduction is voluntary). | RWG is not in favour of the % reduction targets. While targets will be more challenging for very high sodium products, RWG aims to shift whole categories down and narrow the range of sodium values. |
| Amend approach | Reformulate gradually. | RWG is proposing single end-point targets, and emphasises that industry has flexibility to implement according to their own internal product development cycles – this may involve incremental changes. |
| Timeframe | Companies nominate a proportion of their products for reformulation within the proposed timeframe with other products to be reformulated after (or to be reformulated to a lower sodium content but which is still above the target). | |
| | Organisations to provide annual progress reports starting in 2019, in which potential challenges are identified to inform future requirements. If voluntary reformulation progress is not meaningful in terms of reduction in overall sodium in these items, government regulation should be enforced. If reductions are meaningful, then target should continue to be reduced progressively. | As consulted on, companies will be asked to report to the IMERG at 2yrs and after 4yrs. RWG acknowledge an interest in being able to report early successes of the Reformulation Program, but believe that companies who want to talk publicly about their progress will do so. |

3.3.15 Category 15: Gravies and sauces – other savoury sauces

Definition: All other sauce-type products used in cooking and not already included in other categories, which are major components of a meal and are 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.

ENDORSED TARGET: A reduction in sodium across defined products to 360mg per 100g/ml by 30 June 2024.

Inclusions

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). Includes both shelf stable and chilled varieties.

Exclusions

Tomato paste, curry paste, herbs, spices, condiments (e.g. pickles, relishes), tomato sauce, BBQ sauce, Asian-style cooking sauces, gravies and finishing sauces, pesto, recipe concentrates or meal base powders / sachets.

Overview of responses

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Eight of 15 participants indicated that they disagreed with the definition for this food category. Responses from these participants led to two main themes being identified. Seven participants indicate that greater clarification of the definition is required and/or the definition is confusing. Specifically, the meaning of “main characterising component” was isolated as a term for which understanding is sought (industry group). Likewise, another industry group suggest the definition is expanded upon and clear guidance on what products were used to set the criteria. All of these six participants also identified confusion around the inclusions and exclusions of foods within this category. The most frequently identified concern is the inclusion of dry, requiring rehydration or liquid products (also described as powdered and reconstituted products). Four participants were confused by the inclusion of these products when recipe concentrates are listed in the exclusions, but casserole bases (dry and requiring reconstitution) are included (the AFGC and three other industry groups). Woolworths suggests the category should exclude recipe bases and concentrates as per the previous description by the FHD. However, another industry submission proposed that separate targets should be set for recipe bases, along with cooking sauces and simmer sauces. It was also unclear whether the target relates to the products as prepared and whether this can only involve the addition of water (as opposed to milk, cream or other ingredients). One industry group provided a specific example in which their powdered recipe bases would be required to reduce sodium content but that a similar liquid base would not. Both meals when made up according to instructions would have a comparable amount of sodium per serve. This group indicated that they felt it was unclear as to whether these products were, in fact, included. Furthermore, they indicated that they had considered their own dry and wet recipe bases as being out-of-scope with regard to this category as they identify their products as recipe bases or recipes concentrates rather than sauces. Three participants provided feedback regarding the lack of clarity around the inclusion or exclusion of sauces used exclusively in food service (Woolworths and two other industry groups).

Two industry groups (including the AFGC) specifically indicated that the range of products in this food category varies substantially and so the same sodium target is not feasible for all products included in this category. Respondents indicated that reformulation should be phased, and products prioritized for need for reformulation. Should a clearer inclusion/exclusion criteria be implemented, perhaps via the separation of the category into smaller sub-categories, sodium targets may differ across the newly created categories. As part of their responses, the eight participants who indicated the definition for this group is inappropriate also suggested solutions to the concerns summarized above. These are summarized in the ‘Recommendations’ section below.

A response from the Prevention, Population Health Branch and the Food Safety Unit of the Victorian Department of Health and Human Services Department noted that the target for this food category is not consistent with existing Healthy Choices and National Healthy School Canteens guidelines.

The George Institute for Global Public Health investigated the sodium content of 636 items from this food category captured in the FoodSwitch database (as compared to the FoodTrack database used in the development of the reformulation target). 48% of the items in the FoodSwitch database were found to already meet the proposed target. Given the sodium profile was consistent across both databases, and the target is below the UK 2017 sodium target and lower than the previous FHD target, the George Institute concluded the target is feasible. However, the George Institute highlight the challenge associated with achieving this target for this food category given the large variability in items available. One industry submission asserted that the target be set at 10% reduction in sodium rather than an absolute target.

A large number of concerns and challenges (including technical constraints) were identified for this food category, despite ten of the 15 responses indicating no technical constraints or concerns and challenges with regard to this food category. As for many of the food categories, a common concern

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was food safety, specifically with regard to salt's role as a preservative. Food safety must also be considered in the context of sodium's role in reducing water activity in items such as shelf-stable pasta and curry sauces in which sodium reduces water activity. This reduces the potential for microbial growth. However, public health organizations highlight that there is a wide range of sodium content in these food items, suggesting that sodium reduction is both feasible and safe.

An unfavourable effect on taste, consumer preference and identity were also raised as potential concerns and challenges for this group of items. Salt is used for flavour and should it be removed, may be replaced with artificial ingredients. An industry group identifies that reformulation is likely to require changes to recipes. Reducing sodium in products with inherently high sodium profiles (e.g. sauces containing bacon, chorizo or cheese, and recipe bases sold in powdered form) will be greatly affected in terms of these concerns (some products would require a 47-55% reduction in sodium to achieve the target). It appears that a higher contribution of sodium from characterizing ingredients is acknowledged in the 'Asian' and 'pesto' sauces categories, but not within this category. Moreover, industry groups have identified that the target is below the lower range for items in this category, which is in contrast to the 'as-prepared items in the 'Gravies and Finishing Sauces' and 'Asian Sauces' categories for which the target is 120mg and 422mg above the lower range, respectively. Other industry groups highlight the importance of satisfying consumer expectations, including the requirement for items to pass through a customer sensory panel before being available on shelves.

The maintenance of the safety, taste, quality and consumer acceptance of items whilst reducing sodium content is associated with increased cost and reduced commercial viability. Reformulated items will likely require new packaging which is also costly, and many ingredients will need to be replaced.

Finally, global companies are limited in their capacity to change global formulations of certain products, with some items being sold under license.

Six respondents felt the timeframe for reformulation for this food category is reasonable. One participant indicated that five years would be a reasonable timeframe. Other participants commented that the timeframe would not be reasonable because the target is challenging across all products in this category, with the target being unreasonable and unlikely to be met for some of the items with the highest salt profile. Similarly, one participant suggested the timeframe was appropriate if the target was only applied to 80% of the items. Greater time is required to reformulate items whilst ensuring they still meet consumer expectations (this may include the gradual modification of consumer's taste preferences over time), and to learn from technical challenges which may arise during this process. More specifically, one industry organisation suggested a six-year transition period for the category due to the substantial reduction required in many products.

Interestingly, one respondent identified that a shorter timeframe may be possible due to an existing (lower) criteria for the Healthy Choices and National Healthy School Canteens guidelines, and the UK 2017 sodium target; which may mean that industry have already started to reformulate.

Public health groups are supportive of an incremental roll out of the targets but concede their limitations with regard to knowledge about time needed for this to occur from a manufacturing perspective.

Summary of Recommendations for Food Category 15: Gravies and sauces – other savoury sauces

It is important to consider the following recommendations are predominantly from participants that have responded unfavourably to the reformulation targets. They should be considered in the context of the data collected from all participants.

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Table 16: (other savoury sauces) Consultation recommendations and RWG decisions

| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|---|---|
| Amend definition | Separate food category into smaller sub-categories with varying sodium targets Create a category for 'Powdered meal sauce/ base'; noting that the New Zealand target is 5000mg/100g for dry powdered meal bases. | Targets are as prepared /reconstituted using on pack instructions. Dry powder targets are problematic due to concentration factors - it is not clear / consistent how many serves of sauce are to be made per quantity of powder. Therefore targets apply to sodium values of the liquid and 'as prepared' sauces. |
| | Exclude taco sauces, salsas and toppings; recipe bases (requiring additional ingredients) or concentrates; and natural products that do not contain food additives. | Taco flavour powder is excluded. If sold as a sauce to stir through a flavour tacos, it would be included Salsa, taco sauces used as a condiment are excluded. |
| | Include simmer sauces, cooking sauces. | Include these in definition, unless they are already captured in Asian sauces or other sauces category. |
| | State target as per 100mL. | 100g or 100ml as per the packaging. Semi-solid foods (sauces) are often sold as grams weight. |
| | Clarify inclusion/exclusion regarding food service sauces and sauces that can be multifunctional (e.g. added during or at the end of cooking. | The reformulation targets have been set at the retail level, using FoodTrack (supermarket retail product) data. The focus for monitoring will be on retail products. Notwithstanding this, products manufactured for food service are encouraged to try to meet the targets and companies may wish to make a corresponding pledge under the Food Service Pledge Scheme RWG note that in many instances a same product is manufacturers for both retail and food service channels. Any sauces (used for multiple cooking purposes) which are marketed or depicted on pack as a finishing sauce should work towards that target. Sauces otherwise not captured should apply the 'other savoury sauces' target. |
| Amend target | Align with Healthy Choices and National Healthy School Canteens guidelines for comparable category. | RWG note that industry may already be working towards these lower targets. Products marketed to schools may go lower still, while the category as a whole is encouraged to reformulate through this RWG target. |
| | For items containing ingredients that are inherently high in sodium (e.g. bacon and chorizo). | Reformulation targets for higher sodium products which are often also |

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| Type of recommendation | Specific recommendation | RWG notes |
|--------------------------|---|--|
| | | used as ingredients, e.g. cheese will help to achieve the target. |
| | New items must contain 15% less sodium than existing comparable products. | New product development will be subject to business' internal policy. The reformulation target would apply to any new products developed in scope of the definition. |
| | Reduce sodium by 10% in recipe bases (separate sub-category from the current category). | <p>Recipe /meal bases are excluded from this category. Recipe bases are not consumed in their 'base' form (wet or dry) but have meat, veg, pasta etc. added. It is challenging to determine their stand-alone contribution to total population dietary intakes.</p> <p>RWG note this may be a growth category, but do not consider that a separate sub-category is required for recipe bases.</p> <p>RWG prefers to set maximum rather than % reduction targets.</p> |
| Amend approach | Do not reformulate. | <p>This food category was identified as making a significant contributing to population sodium intakes, and data shows a range of sodium content indicating technical feasibility for products which are acceptable to consumers.</p> <p>Many companies are already reformulating products, however the Partnership reformulation program aims to shift whole categories.</p> |
| | Limit target to companies that have existing reformulation targets. | |
| Research and development | Sodium replacement options. | RWG is proposing single end-point targets, and emphasises that industry has flexibility to implement according to their own internal product development cycles. |
| Timeframe | For products significantly above the reformulation target, permission to gradually reduce sodium by 20% over four year timeframe. | RWG is proposing single end-point targets, and emphasises that industry has flexibility to implement according to their own internal product development cycles – this may involve incremental changes. |
| | Companies required to reformulate 80% in four-year timeframe. | |
| | Companies to nominate the proportion of products within their range for reformulation in four-year timeframe, with a view to reformulation of more items in their range after further investigation into feasibility. | |
| | Organisations to provide annual progress reports starting in 2019, in which potential challenges are identified to inform future | As consulted on, companies will be asked to report to the IMERG at 2yrs and after 4yrs. |

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| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|--|---|
| | requirements. If voluntary reformulation progress is not meaningful in terms of reduction in overall sodium in these items, government regulation should be enforced. If reductions are meaningful, then target should continue to be reduced progressively. | RWG acknowledge an interest in being able to report early successes of the Reformulation Program, but believe that companies who want to talk publicly about their progress will do so. |

3.3.16 Category 16: Pizza

Definition: 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.

ENDORSED TARGETS:

Sodium: A reduction in sodium across defined products to 450mg/100g by 30 June 2024.

Saturated Fat: A reduction in saturated fat across defined products to 4g/100g by 30 June 2024.

Inclusions:

Pizzas, calzones, pizza pockets, can be slices or whole.

Exclusions:

Pastry-based dishes, pizza toppings, pizza-flavoured foods (e.g. pastries, biscuits), pizzas from takeaway or fast-food restaurants.

Overview of responses

Eight of nine respondents indicated they agreed with the definition for this food category, with only one industry group expanding to indicate they would prefer there to be two sub-categories within the definition: pizzas with high-sodium toppings (suggested target: 550-600mg/100g) and pizzas with low-sodium toppings (suggested target: 450mg/100g).

Feedback on the sodium target

There were conflicting views with regard to the specific target for this food category. Woolworths recommended that the target be revised, or that 5% of the range of a company be allowed to exceed the target. In contrast, the George Institute for Global Health support the reformulation target, based on their consideration of FoodSwitch data and note that the target is below the current 2017 UK sodium target of 500mg/100g. The prevention, Population Health Division and Food Safety Unit (Victorian Government) support the reduction of the target further to 400mg/100g so as to be consistent with the Healthy Choices and National Healthy School Canteens guidelines.

Consistent with their suggestion for the 'Pizza' food category to be separated into two sub-categories, Woolworths and another industry group identified the large variance in sodium content of items in this category as a technical constraint for the proposed reformulation. Woolworths hypothesised that the reduced sodium target could lead to a reduction in the number of toppings included on a pizza which is generally unfavourable in terms of consumer acceptance. The industry group previously mentioned also suggest that the target could limit new product development which aims to reinvigorate the range of flavours and meat variants used in items in this category.

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Although in support of the target, DAA acknowledges the difficulty of achieving this target given many items exceed the sodium target substantially (this conclusion was based on findings of a brief in-person market assessment performed by a Food Regulatory and Policy Committee member). In addition, DAA notes the role of sodium in maintaining food safety and food texture. In providing potential solutions to reducing sodium content in these items, DAA suggests the replacement of sodium in pizza dough with potassium chloride or other substitutes, and encourage companies to consider the use of herbs, spices and vegetables to enhance flavour.

Food safety concerns were reiterated via comments about sodium's role as a preservative, removal of which could shorten shelf-life or lead to the addition of food additives.

Despite five respondents indicating that the proposed reformulation timeframe (four years) is not suitable, comments indicate that this could be solved by incremental reductions to the target over a longer period of time, or through companies being able to reformulate individual items over time (e.g. focus on reformulation of some items initially, and then others at a later time). DAA supports consultation with industry to agree on a feasible timeframe to allow successful reformulation without compromising product safety and quality.

Feedback on the saturated fats target

A member of the public has suggested that the reduction of saturated fats is based on lack of scientific evidence, and argues that it is only artificial trans fats that should be limited. This respondent also expressed concern that a reduction of saturated fat could lead to increased use of artificial flavours and food additives.

In contrast, both the DAA and Coles support the saturated fat target. The DAA completed a brief in-person market assessment and reported that most products met the saturated fat target. Although in support of the reformulation, the DAA acknowledges the challenge of reducing fat without influencing consumer acceptance especially with regards to taste, texture, heat transfer during cooking and maintaining shelf-life. The DAA encourages manufacturers to consider new and innovative ways to develop products that meet the targets. Coles also acknowledged the potential impact on organoleptic properties and limitations on new product development. The Victorian Government group provided feedback supporting the target, given that it aligns with the existing Healthy Choices guidelines and National School Healthy Canteens guidelines.

Woolworths indicated concern that the amount of topping may need to be reduced in order to reach targets, which will be especially difficult with regard to those with higher fat processed meats. In addition, cheddar cheese may need to be replaced with mozzarella, or those already using mozzarella may require a reduced amount. Woolworths supports the need for all companies to be complicit in the target, so as not to affect company competitiveness. They do however, support the implementation of the target.

The George Institute of Public Health indicates that they believe the target is too conservative and suggest it should be lowered to 3g/100g. This is based on analysis of the saturated fat content of 159 products captured in the FoodSwitch database (as compared to the FoodTrack database used by the RWG in the development of the targets). This analysis determined that 69% of products already meet the target. The proposed target was set at a Healthy Star Rating (HSR) cut-point (4 HSR baseline points).

Despite five respondents indicating that the proposed reformulation timeframe (four years) is not suitable, comments indicate that this could be solved by incremental reductions to the target over a longer period of time, or through companies being able to reformulate individual items over time

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(e.g. focus on reformulation of some items initially, and then others at a later time). DAA supports consultation with industry to agree on a feasible timeframe to allow successful reformulation without compromising product safety and quality.

Summary of Recommendations for Food Category 16: Pizza

It is important to consider the following recommendations are predominantly from participants that have responded unfavourably to the reformulation targets. They should be considered in the context of the data collected from all participants.

Table 17: (Pizza) Consultation recommendations and RWG decisions

| Type of recommendation | Specific recommendation | RWG notes |
|-----------------------------|--|--|
| Amend definition | Separate food category into smaller sub-categories and amend targets: high-sodium toppings: 550-600mg/100g and pizzas with low-sodium toppings: 450mg/100g). | Analysis of the FoodTrack data shows that 'meat' and 'non-meat' based pizzas have various and interspersed nutrient values, particularly for sodium but also for saturated fats. There is not an obvious other basis for the split other than high and low sodium values. RWG does not consider that this is a basis in itself for separating the category. |
| Amend sodium target | Increase target (or allow 5% of portfolio to exceed target. | RWG confirms the 450mg target. |
| | Reduce to 400mg/100g | |
| Amend saturated fats target | Reduce target to 3g/100g. | Most sat fat seems to be coming from the cheese, and some of the highest products in the FoodTrack database are cheese pizzas; or party-size (ratio of base to topping) an outlier at 8mg. Meat-lovers style pizzas are around 5mg. UK didn't have a sat fat target and there was no target under the FHD. Retain 4g target, noting sat fat targeting is relatively new, and will have interactions with sodium reformulation as well. |
| Replacement option | Potassium chloride in pizza bases. | RWG emphasises that industry has flexibility to implement according to their own internal product development cycles – this may involve incremental changes. |
| Test consumer acceptance | Replace sodium with enhancing flavour using herbs, spices and vegetables. Companies to consider new and innovative ways to achieve the target | |
| Further consultation | Targeted consultation with industry regarding appropriate timeframe to allow reformulation without compromising safety or quality. | |
| Timeframe | Organisations to provide annual progress reports starting in 2019, in which potential challenges are identified to inform future | As consulted on, companies will be asked to report to the IMERG at 2yrs and after 4yrs. |

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| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|--|---|
| | requirements. If voluntary reformulation progress is not meaningful in terms of reduction in overall sodium in these items, government regulation should be enforced. If reductions are meaningful, then target should continue to be reduced progressively. | RWG acknowledge an interest in being able to report early successes of the Reformulation Program, but believe that companies who want to talk publicly about their progress will do so. |

3.3.17 Category 17: Processed meat – ham

Definition: Cured pork product generally containing pork, starch, salt, mineral salts, sugar, antioxidant, sodium nitrate, spices and water. Includes all fat varieties.

ENDORSED TARGET: A reduction in sodium across defined products to 1005mg/100g by 30 June 2024.

Inclusions

Packaged or deli ham, including leg ham, shaved ham, lite ham, and flavoured varieties (e.g. honey ham).

Exclusions

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, processed deli meats, Frankfurts and saveloys.

Overview of responses

Clarification was sought regarding the definition of ‘leg of ham’ and there was a query about why this should be excluded. Woolworths strongly advocated that reformulation of sodium content of this category should not proceed, because of their recent reformulation to meet the FHD target which required substantial investment to achieve a safe and acceptable range of items. In contrast, the George Institute for Global Health (supported by two other submissions) states that the target is too conservative and should be reduced to 900mg/100g. This is based on consideration of FoodSwitch data, but also because the target exceeds the 2017 UK sodium target and is higher than the Healthy Choices and National Healthy School Canteens guidelines.

Food safety was the major concern of respondents. Sodium plays a key role in preservation and a reduction in sodium could pose a threat to the health of consumers. Should sodium be reduced, there would need to be significant testing to establish shelf-life and to re-label products accordingly.

Most respondent were agreeable with the timeframe for reformulation of items in this food category. However, the AFGC recommended that some manufacturers may need a longer time as they have a large number of products in this category. In contrast, given the Healthy Choices and National Healthy School Canteens guidelines have recently required a reduction in sodium in these products, perhaps change is already occurring and hence the timeframe may be able to be reduced.

Summary of Recommendations for Food Category 17: Processed meat – ham

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It is important to consider the following recommendations are predominantly from participants that have responded unfavourably to the reformulation targets. They should be considered in the context of the data collected from all participants.

Table 18: (ham) Consultation recommendations and RWG decisions

| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|---|--|
| Amend definition | Clarify the definition and inclusion/exclusion of 'leg of ham'. | Leg of ham is included. In exclusions, replace 'leg of ham' with 'fresh ham – raw, uncured, requiring cooking'. |
| Amend target | Reduce to 900mg/100g | RWG recognises that work has been done previously to reduce the sodium of ham, and potential for food safety concerns if the sodium level were to be set too low. The target of 1005 is considered to be challenging but feasible. |
| Amend approach | Do not reformulate. | |
| Timeframe | Increase. | |
| | Reduce. | |
| | Allow manufacturers to identify products that they will reformulate within the timeframe, with a view to reformulate remaining products after this time. | RWG is proposing single end-point targets, and emphasises that industry has flexibility to implement as they see fit, which may include incremental changes. RWG aims to shift the whole category towards the target within the implementation period. |
| | Organisations to provide annual progress reports starting in 2019, in which potential challenges are identified to inform future requirements. If voluntary reformulation progress is not meaningful in terms of reduction in overall sodium in these items, government regulation should be enforced. If reductions are meaningful, then target should continue to be reduced progressively. | As consulted on, companies will be asked to report to the IMERG at 2yrs and after 4yrs. RWG acknowledge an interest in being able to report early successes of the Reformulation Program, but believe that companies who want to talk publicly about their progress will do so. |

3.3.18 Category 18: Processed meat – bacon

Definition: Cured and smoked pork product generally containing meat, sugar, mineral salts, antioxidant, nitrite and water. Includes all fat varieties.

ENDORSED TARGET: A reduction in sodium across defined products to 1005mg/100g by 30 June 2024.

Inclusions

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).

Exclusions

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, vegetarian/vegan alternatives, processed deli meats, Frankfurts and saveloys.

Overview of responses

Ten participants provided feedback as part of the consultation for the 'Processed meat – bacon' food category. Eight of these determined that the proposed definition was reasonable. The exclusion of items from the category was suggested by two respondents in order to improve the definition. The AFGC recommends the removal of pancetta from the bacon from the inclusion list because it is not an example of an injection cured bacon and when traditionally manufactured, it is a dry cured salted meat like prosciutto. The Food Safety Unit and Prevention and Population Health Branch (Victorian government) query the exclusion of 'Protected Designation of Origin' products and suggest that if nutrition information is available for these commonly-consumed products then they should not be excluded.

The George Institute for Global Health support the proposed sodium target based on FoodSwitch data, HSR cut-points and FHD and UK 2017 sodium targets. However, based on the same rationale, the World Action on Salt and Health public health group recommend a more ambitious target, however they do not specify this target. The Prevention, Population Health Branch and Food Safety Unit (Victorian government) also notes that the target is higher than the Healthy Choices and National Healthy School Canteen guidelines of 750mg/100g, but do not make recommendations regarding change to the proposed target.

Four participants identified technical constraints, and nine identified concerns and challenges associated with the reformulation of items in this category. The role of sodium in preservation was raised by three participants, especially with regard to how a reduction of sodium will impact shelf-life (and consequently food wastage and labelling changes), food safety and artificiality (if sodium is replaced by artificial ingredients). DAA encourages consultation with food technologists in order to ensure the reduction occurs without threats to food safety. The impact of consumer acceptance was also identified given the role of salt in the flavour of bacon. DAA highlights research that sodium reductions of bacon are noticeable to consumers and therefore need to be implemented incrementally. Woolworths agrees that time is required for consumers' palates to adjust but support the reformulation, whilst another industry group also highlight that variances in analytical testing and actual sodium content of products, could present a challenge to setting a specific sodium target. The amount of sodium in items varies due to batch and testing variances and so the content may vary from test to test (sometimes this could result in the product being considered above the target on some occasions). One industry group suggests that a rolling average of sodium content be used to

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determine compliance, and that manufacturers only be encouraged to reduce sodium if the rolling average exceeds to target.

Responses were mixed with regard to the appropriateness of the reformulation of timeframe for this food category. The AFGC suggests that for companies with a large number of products which fit into this category, revalidating all products may take longer than four years. In contrast, the Food Safety Unit and Prevention and Population Health Branch (Victorian government) suggests a shorter timeframe may be achievable given the existence of a lower target in the Healthy Choices and National Healthy School Canteens guidelines.

Summary of Recommendations for Food Category 18: Processed meat – bacon

It is important to consider the following recommendations are predominantly from participants that have responded unfavourably to the reformulation targets. They should be considered in the context of the data collected from all participants.

Table 19: (bacon) Consultation recommendations and RWG decisions

| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|--|---|
| Amend definition | Exclude pancetta. | Agree, exclude pancetta |
| | Include 'Protected Designation of Origin' items. | Imports are not excluded; the RWG notes that it may be difficult to influence the manufacture of imported products, but also that other countries are setting sodium reduction targets for products including bacon. If a particular salt/sodium level is defined as part of the product formulation and identity then they may be excluded, however this is thought to be unlikely for bacon, and pancetta is not listed as an exclusion. |
| Amend target | Reduce. | RWG confirms the target of 1005mg |
| Amend approach | Compliance should be assessed on a rolling average sodium content of items as these may change due to the batch and testing methods used. | As consulted on, companies will be asked to report to the IMERG at 2yrs and after 4yrs. Company report can note this in their reporting if it is a concern. |
| | Incremental reformulation. | RWG is proposing single end-point targets, and emphasises that industry has flexibility to implement according to their own internal product development cycles – this may involve incremental changes. |
| Timeframe | Increase. | As consulted on, companies will be asked to report to the IMERG at 2yrs and after 4yrs. RWG acknowledge an interest in being able to report early successes of the Reformulation Program, but believe that companies who want to talk publicly about their progress will do so. |
| | Reduce. | |
| | Organisations to provide annual progress reports starting in 2019, in which potential challenges are identified to inform future requirements. If voluntary reformulation progress is not meaningful in terms of reduction in overall sodium in these items, | |

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| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|--|-----------|
| | government regulation should be enforced. If reductions are meaningful, then target should continue to be reduced progressively. | |

3.3.19 Category 19: Processed meat – processed deli meats

Definition: Processed and reformed meat products (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.

ENDORSED TARGET: A reduction in sodium across defined products to 720mg/100g by 30 June 2024.

Inclusions

Devon, fritz, chicken loaf, mortadella, pastrami, chicken rolls, Berliner, corned beef and other processed meats (e.g. shaved chicken, turkey or beef if in alignment with subcategory definition).

Exclusions

Sausages sold raw, ham, bacon, twiggly 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), Frankfurts and saveloys.

Overview of responses

Seven of 10 respondents determined the definition for this category to be appropriate. The AFGC seeks clarification regarding meat sold as a sliced product and that sold as a knob, as these products require a different amount of sodium for shelf-life. They also believe it is necessary to clarify in the definition that products like kabana, kransky and Polish sausage are excluded. A large industry group also strongly recommends the exclusion of cooked uncured meats such as roast beef due to food safety issues. Woolworths suggest the exclusion of emulsified luncheon meats.

Woolworths is concerned that all processed deli meat is covered by a single sodium target and believes this target is unachievable for most processed deli meats. The company recommends the higher Food and Health target of 1090mg/100g for ham/bacon and other nominated cured meat products be maintained. DAA states that it may be difficult for manufacturers to meet the target given their research suggests that many of the items currently available do not meet the target. Both Woolworths and the AFGC believe the target is unachievable. Salami, pork devon, chicken and beef products all exceed the target substantially. However, the Food Safety Unit and Prevention and Population Health Branch (Victorian government) asserts that the target is feasible, given some small Victorian businesses have reduced sodium profiles to below this target successfully. In addition, the target aligns with the existing Healthy Choices and National Healthy School Canteens guidelines.

The George Institute for Global Health supports that the reformulation target is achievable, but suggest that Australia should aspire to reducing even further (to the UK 2017 sodium target of 650mg/100g). The current proposed target is at an HSR cut-point and indicates that 28% of the 108

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relevant products in the FoodSwitch database already meet the target. The World Action on Salt and Health support the George Institute's submission.

Various concerns, challenges and technical constraints were identified in the consultation for this food category. These can be summarised as relating to food safety (and shelf-life if sodium is reduced) and consumer acceptance (including taste, artificiality, cost and product quality). Industry group the AFGC highlights the role of sodium in preservation, but DAA highlight that there is already a short shelf-life for these products which is unlikely to be impacted if items are stored as per instructions on labels. Salt is an important flavour in these items and reduction could compromise product quality. Likewise, consumer acceptance will be impacted if the sodium level is reduced so much that it influences the structure of sliced meats (sodium is required for protein extraction for binding, and the proposed target is not much higher than the functional limit to ensure the meat doesn't fall apart). It is likely that if sodium is reduced then other artificial ingredients may need to be added if the shelf-life, taste and structure of the products are to remain acceptable to the consumer.

Woolworths also highlights the importance of emulsified luncheon meats in limiting food waste in the manufacturing of smallgoods whilst providing a lower cost product for consumers. The target may not allow for commercially-viable production.

A public health group (Victorian Government department) affirms that a four-year reformulation timeframe is reasonable. The Food Safety Unit and Prevention and Population Health Branch (Victorian government) suggests that given the target is consistent with UK 2017 sodium target and Healthy Choices and Healthy School Canteen guidelines, a shorter timeframe could be set.

Summary of Recommendations for Food Category 19: Processed meat – processed deli meats

It is important to consider the following recommendations are predominantly from participants that have responded unfavourably to the reformulation targets. They should be considered in the context of the data collected from all participants.

Table 20: (processed deli meats) Consultation recommendations and RWG decisions

| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|--|--|
| Amend definition | Exclude products such as kabana, kransky and Polish sausage; emulsified luncheon meats and cooked uncured meats. | Kabana, kransky, and polish sausage are excluded. Emulsified meats are included (e.g. devon, fritz). |
| Amend approach. | Do not reformulate. | RWG notes that the previous FHD target of 830mg was largely unmet, or the product mean increased again over time. RWG is proposing single end-point targets, and emphasises that industry has flexibility to implement according to their own internal product development cycles – this may involve incremental changes. |
| | Incremental reformulation. | |
| Timeframe | Reduce. | A 4 year implementation period is proposed. |
| | Organisations to provide annual progress reports starting in 2019, in which potential challenges are | |

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| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|--|--|
| | identified to inform future requirements. If voluntary reformulation progress is not meaningful in terms of reduction in overall sodium in these items, government regulation should be enforced. If reductions are meaningful, then target should continue to be reduced progressively. | As consulted on, companies will be asked to report to the IMERG at 2yrs and after 4yrs. RWG acknowledge an interest in being able to report early successes of the Reformulation Program, but believe that companies who want to talk publicly about their progress will do so. |

3.3.20 Category 20: Processed meat – frankfurts and saveloys

Definition: Frankfurts/Frankfurters, hot dogs and saveloys.

ENDORSED TARGETS:

Sodium - A reduction in sodium across defined products to 900mg/100g by 30 June 2024.

Saturated Fat - A 10% reduction in saturated fat across defined products with saturated fat levels exceeding 6.5g/100g by 30 June 2024.

Inclusions

Frankfurts/Frankfurters, hot dogs and saveloys.

Exclusions

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.

Overview of responses

Only one of nine respondents provided a suggestion for change with regard to the definition of this food category. The Food Safety Unit and Prevention and Population Health Branch (Victorian government) suggests the category should include kabana, kransky and Polish sausage (or, if Polish sausage is sold raw, then it should be included in sausages category).

Feedback on sodium target

Woolworths does not support the sodium target for this category due to the production method of these items. These items are often produced from meat trimmings of other smallgoods so it would be difficult to control the sodium content (as compared to the production of regular sausages where the ingoing meat specifications are tightly controlled). DAA supports that it may be difficult to reduce sodium in these products for this reason, however they still support the reformulation target and state that manufacturers should be encouraged to at least attempt to meet the target. In contrast, public health concerns are based on the fact that the target is higher than the UK 2017 sodium target and substantially exceeds the Healthy Choices and National Healthy School Canteens guidelines. The George Institute for Global Health also supports the feasibility of the target and suggest that the target could be further reduced in the future so as to be consistent with the UK 2017 target.

The preservation role of sodium is raised as a concern for reformulation of products in this category, and respondents indicated concern that shelf-life (and subsequently food wastage) will be affected if sodium is reduced. These products also lead to reduced food wastage in the production of other smallgoods and if these off-cuts cannot be used to make other products this will threaten commercial

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viability. Likewise, sodium is important for the texture of these products, and reduction may result in reduced consumer acceptance.

Four of eight respondents expressed that the four-year timeframe is appropriate. Given the existing guidelines for reduction in sodium content (Healthy Choices and National Healthy School Canteens guidelines and the UK 2017 sodium target), some reformulation be able to be achieved in a shorter timeframe. Incremental reductions were encouraged by multiple respondents.

Feedback on saturated fats target

A member of the public indicated that they believe the reformulation is not necessary as saturated fat is healthy and hydrogenated oils should be the target for reduction.

The AFGC expressed concern regarding the impact of a reduction of saturated fat would have on the sensory impact of the meat, and the cost of production. It states that the saturated fat is dependent on the amount of meat in the product and therefore a reduction would only be able to be achieved by reducing the amount of meat in the product. Alternatively, a leaner cut of meat would be required but this would increase cost. The AFGC also highlights the specific price point that these products have in the market. They recommend further targeted consultation with industry to ensure targets are appropriate for frankfurts and saveloys. Woolworths add that frankfurts and saveloys include leftover meat that remains after other cuts are manufactured, and if this meat is not used for these products then food wastage will occur.

The Victorian Government provided feedback that the proposed reformulation target does not align with the existing Healthy Choices guidelines and National School Healthy Canteens guidelines (which recommend these products should have 5g/100g or lower).

Woolworths agrees with the proposed target.

The George Institute recommends the target should be further reduced to 4g/100g. This is based on their analysis of FoodSwitch data which indicated that 53% of products already meet the target and this target matches that set by the Food and Health Dialogue (FHD) in 2011. Finally, the target was not set at a HSR cut-point.

Four of eight respondents expressed that the four-year timeframe is appropriate. Incremental reductions were encouraged by multiple respondents.

Summary of Recommendations for Food Category 20: Processed meat – frankfurts and saveloys

It is important to consider the following recommendations are predominantly from participants that have responded unfavourably to the reformulation targets. They should be considered in the context of the data collected from all participants.

Table 21: (frankfurts and saveloys) Consultation recommendations and RWG decisions

| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|---|--|
| Amend definition | Include products such as kabana, kransky and Polish sausage (or, if Polish sausage is sold raw then it should be in the sausages category). | Exclude cured / smoked sausages, e.g. Polish sausage, kransky and cabana. If Polish sausage is sold raw, it should be in the 'sausages' category. |
| Amend sodium target | Further reduction of the target should be implemented in the future. | Noted. Consideration of future further reformulation work is out of scope for the RWG in setting these targets. |

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| Type of recommendation | Specific recommendation | RWG notes |
|-----------------------------|---|--|
| Amend saturated fats target | Reduce further (to 4g/100g). | The proposed target reaffirms the target set under the Food and Health Dialogue, which has not yet been met for all products. There is no comparable target in the UK or New Zealand RWG propose to retain the target of 10% reduction for products above 6.5g. |
| Amend approach | Do not reformulate. | RWG is proposing single end-point targets, and emphasises that industry has flexibility to implement according to their own internal product development cycles – this may involve incremental changes. |
| | Incremental reductions. | |
| Further consultation | Further targeted consultation with industry. | The RWG considers that the targets are technically feasible and were developed originally through extensive consultation under the Food and Health Dialogue. |
| Timeframe | Reduce. | As consulted on, companies will be asked to report to the IMERG at 2yrs and after 4yrs. RWG acknowledge an interest in being able to report early successes of the Reformulation Program, but believe that companies who want to talk publicly about their progress will do so. |
| | Organisations to provide annual progress reports starting in 2019, in which potential challenges are identified to inform future requirements. If voluntary reformulation progress is not meaningful in terms of reduction in overall sodium in these items, government regulation should be enforced. If reductions are meaningful, then target should continue to be reduced progressively. | |

3.3.21 Category 21: Ready meals

Definition: Meals sold as ready-to-eat. May require re-heating or added accompaniments (e.g. potato, rice, noodles, pasta). Includes chilled and frozen varieties.

ENDORSED TARGET: A reduction in sodium across defined products to 250mg/100g by 30 June 2025.

Inclusions

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 (e.g. quinoa and bean salads in shelf-stable container) and 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.

Exclusions

Meals requiring reconstitution (powdered or dry sachets), kit meals (e.g. taco kits, sushi kits), any meals requiring the addition of fresh ingredients (e.g. vegetables, meat, meat alternatives), soups, pizzas and dishes requiring preparation (e.g. Mac & Cheese, 2 Minute Noodles). Salads

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(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).

Overview of responses

Seven of 14 respondents agreed the definition of this food category was appropriate. A member of the public suggests the exclusion of any natural, fresh products without food additives. Many respondents reported that they found the definition unclear, with suggestions made regarding inclusion and exclusion of several items. Most respondents indicated they were unclear about whether both ready meals that do not require added ingredients, and those that do require the addition of other ingredients are included in the definition. It is also unclear if reconstituted meals are included. One industry submission asserted that side dishes should not be considered as full meals in this category, and the target is too conservative for side dishes. This industry group and the AFGC seek greater clarity in the definition regarding what defines a major characterising component of the meal. Many suggest that the target would need to be different for these items and may require a separate food category. Woolworths asserts that they do not agree with the current definition because the ready meals versus ready meals that require additional ingredients added during preparation do not have comparable sodium profiles. They also suggest that salads are excluded from the definition because although they have a higher sodium content per 100g, they are lighter in weight and per serving, they contain less than a typical 300-400g ready meal. Woolworths, and two other industry groups also indicate that the wide range of items included in this definition could mean that a single sodium target is not applicable. This is supported by two groups, the GLNC and the AFGC, who suggest that a minimum and maximum value be used rather than a single target. In contrast, despite the variation in the range of items, DAA supports the implementation of the target.

The George Institute for Global Health supports the target, based on Food Switch data and comparison of the target to the UK 2017 sodium target.

The role of sodium as a preservative was a concern raised by multiple respondents. An industry group highlighted that sodium is a key ingredient in their products contributing to their longer shelf-life (through microbial control) as compared to other ready meals on the market. They raise concern that a decreased sodium level will impact consumer acceptance.

Taste is also likely to be influenced by reduced sodium and this will also influence acceptance. Replacement of sodium with other ingredients may increase cost and artificiality may not be acceptable to customers. Characterising ingredients of meals in this category will often be salty and therefore are more technically challenging to reformulate.

Interestingly, an industry group identifies the need to ensure that labels communicating the saltier nature of the product are not misleading, i.e. the flavour of the product needs to meet the expectations of the consumer. The submission by the AFGC agrees and highlights the fact that the contribution of higher sodium ingredients has been acknowledged in the savoury snacks category (for salt and vinegar snacks) and in the Asian sauces category and queries why this is not the case for ready meals. Woolworths also suggests the acknowledgement of these characterising ingredients in this category. AFGC queries the consideration of all of the abovementioned concerns in the process used to develop the reformulation target for this category. Woolworths and another industry group both raise concern about the impact of the reformulation on innovation and product development given the resources that will be required.

Summary of Recommendations for Food Category 21: Ready meals

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It is important to consider the following recommendations are predominantly from participants that have responded unfavourably to the reformulation targets. They should be considered in the context of the data collected from all participants.

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Table 22: (Ready meals) Consultation recommendations and RWG decisions

| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|---|---|
| Amend definition | Clarify inclusion of ready meals requiring addition of ingredients and reconstituted ready meals. | The dataset used to determine the target has been reviewed and it does not support separation into sub-categories. Side salads are excluded. Salads sold as a complete meal are included. |
| | Exclude salads. | |
| | Separate into sub-categories. | |
| Amend target | Minimum and maximum values due to variability of items. | The data used to set the target has been reviewed and the decision is to confirm target of 250mg/100g |
| | Percentage reduction for each item. | |
| | Include 10% reduction for products significantly above proposed target, or specifically for Asian meals. | |
| | Reduce further to 230mg/100g. | |
| Amend approach | Companies nominate 95% of their product range for reformulation and attempt to reduce sodium as much as possible in remaining 5%. | RWG is proposing single end-point targets, and emphasises that industry has flexibility to implement according to their own internal product development cycles – this may involve incremental changes. |
| | Phased approach to allow more time to reformulate. | |
| Timeframe | Increase in order to source new technologies and to consider seasonal foods and minimise burden to industry. | As consulted on, companies will be asked to report to the IMERG at 2yrs and after 4yrs. |
| | Reduce. | RWG acknowledge an interest in being able to report early successes of the Reformulation Program, but believe that companies who want to talk publicly about their progress will do so. |
| | Organisations to provide annual progress reports starting in 2019, in which potential challenges are identified to inform future requirements. If voluntary reformulation progress is not meaningful in terms of reduction in overall sodium in these items, government regulation should be enforced. If reductions are meaningful, then target should continue to be reduced progressively. | |

3.3.22 Category 22: Sausages

Definition: 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.

ENDORSED TARGETS:

Sodium - A reduction in sodium across defined products to 540mg/100g by 30 June 2024.

Saturated Fat – A reduction in saturated fat across defined products to 7g/100g by 30 June 2024.

Inclusions

Fresh, chilled and frozen sausages and chipolatas, sold in raw form, made from beef, veal, lamb, kangaroo, chicken, turkey, pork or other meats. Raw Polish sausage

Exclusions

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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).

Overview of responses

Respondents agreed with the definition of the 'sausages' food category.

Feedback on sodium target

This food category has a proposed reformulation target for both sodium and saturated fat. The Food Safety Unit and Prevention and Population Health Branch (Victorian government) encouraged a greater reduction in sodium in order to be consistent with the Healthy Choice and Healthy School Canteens guidelines and proposed 450mg. The DAA supports the target but identifies complexity of applying to butcher sausages as these are often sold without labels. The George Institute for Global Health also supports the target, based on Food Switch data, and the UK 2017 sodium target and HSR cut-point.

Technical constraints to sodium reformulation in this category were identified by participants. This is due to the role of sodium as a preservative, emulsifier and flavour enhancer. A reduction in sodium in sausages could unfavourably influence shelf-life and consumer acceptance, via taste or replacement of sodium with artificial ingredients. DAA encourages the addition of nutritional ingredients such as vegetables and herbs to optimise the taste of sausages. Woolworths highlight that food safety may be compromised as a result of reducing sodium in sausages that do not use nitrites for preservation (e.g. organic sausages). The AFGC also highlighted the complexity of reformulation of items in this category due to meat being supplied by other companies, which makes influencing the sodium content difficult.

An important consideration for this food category is the role of sausages as a low-cost meat option. There is concern that reformulation may lead to increased cost which could substantially impact low-income and food insecure consumers and their families.

There were differing views with regard to the appropriateness of the four-year timeframe for sodium reformulation of items in this category. Both Victorian Government departments state that due to previous targets being set, e.g. 2017 UK sodium target and Healthy Choices guidelines, the reformulation could be achieved in less than four years. In contrast, the DAA supports engagement with industry, and thus incremental reductions so as not to compromise food safety and consumer acceptance. Woolworths highlights the impact of reformulation of both sodium and saturated fat content on taste, and therefore encourage a longer timeframe be considered for this category.

Feedback on saturated fats target

A member of the public expressed opinion that saturated fat should not be reformulated and that trans fats should be the target for change. Woolworths indicated their concern that a 'blanket' saturated fat target for all sausages would not allow for the current 'tiering' of sausages according to fat content (i.e. lower fat and premium options). They suggest that companies could be allowed to identify 95% of their portfolio for which they meet the target. The AFGC identified the complexity that could be faced by some companies that use meat from another company in their product and are therefore unable to influence the fat content.

In contrast, the DAA supports the reformulation target due to the fact that there are already several products on the market that meet the proposed target, while they do acknowledge the importance of fat in food and cooking. Coles also supports the reformulation but provide some specific

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recommendations for how this could be achieved. They suggest two options based on the facts that the saturated fat content of sausages is dependent on the leanness of the animal from which the product is made (i.e. pork, chicken, beef etc), as well as the quality of the cut of meat included in the sausage (i.e. meat:fat ratio). One option provided is to increase the meat:fat ratio of meat included in the products but this will impact the consumer acceptance as fat influences taste of the product. In addition, the price of the product will increase as higher meat:fat ratio cuts are more expensive. This is a concern due to the fact that sausages have a specific price point in the market which is important to many consumers. There would also not be enough appropriate meat:fat ratio trim (the offcuts used to make sausages) to achieve the need for sausages which would also lead to an increase in the value of this meat and thus also influence cost for both the company and the consumer. The second option proposed by Coles to achieve the reformulation is to reduce the amount of meat in the product which would mean an increase in 'premix' as the other ingredient in the product. This would influence consumer acceptability also and would also increase sodium content. With regard to cost, the DAA also notes the important role of sausages as an option for those on a lower budget.

The Victorian Government's feedback suggested the target should be reduced further so as to align with the National School Healthy Canteens guidelines and Victorian Healthy Choices Guidelines (maximum of 5g/100g). Likewise, the George Institute suggested a further reduction to 5g to the target given a large proportion of items on the market already meet the target.

Multiple respondents indicated that the timeframe may not be sufficient to achieve the reformulation.

Summary of Recommendations for Food Category 22: Sausages

It is important to consider the following recommendations are predominantly from participants that have responded unfavourably to the reformulation targets. They should be considered in the context of the data collected from all participants.

Table 23: (Sausages) Consultation recommendations and RWG decisions

| Type of recommendation | Specific recommendation | RWG notes |
|-----------------------------|--------------------------------------|---|
| Amend sodium target | Reduce to 450mg/100g | RWG confirm 540mg as the target. |
| Amend saturated fats target | Reduce (to 5g/100g) | Very few saturated fat targets have been set previously, and not for sausages. The role of fat in providing flavour and moisture, and a use for cheaper cuts of meat, is noted. There is no saturated fat target for sausages in the UK or New Zealand. RWG confirms the proposed 7g/100g saturated fat target. |
| Amend approach | Incremental reductions over time. | RWG is proposing single end-point targets, and emphasises that industry has flexibility to implement according to their own internal product development cycles – this may involve incremental changes. |
| Further consultation | Targeted consultation with industry. | RWG consider that this target is challenging but feasible. Further communication about the reformulation targets should be part of the implementation strategy, |

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| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|---|--|
| | | including to butchers in order to work towards parity between supermarket and other retail outlets. |
| Education | Communicate with consumers regarding safe food preparation of products with changed shelf-lives. | Noted. This information is, and will continue to be conveyed through use by / best before dates, cooking instructions, and other food labelling. |
| | Encourage manufacturers to consider the addition of other ingredients with nutritional value to enhance flavouring (e.g. herbs and vegetables) rather than sodium. | Noted – option for communications about this, notwithstanding industry will determine how best to meet the targets. |
| Timeframe | Reduce. | 4 year implementation period. |
| | Increase. | |
| | Organisations to provide annual progress reports starting in 2019, in which potential challenges are identified to inform future requirements. If voluntary reformulation progress is not meaningful in terms of reduction in overall sodium in these items, government regulation should be enforced. If reductions are meaningful, then target should continue to be reduced progressively. | As consulted on, companies will be asked to report to the IMERG at 2yrs and after 4yrs. RWG acknowledge an interest in being able to report early successes of the Reformulation Program, but believe that companies who want to talk publicly about their progress will do so. |

3.3.23 Category 23: Savoury biscuits – plain savoury crackers and biscuits

Definition: 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.

ENDORSED TARGET: A reduction in sodium across defined products to 630mg/100g by 30 June 2024.

Inclusions

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.

Exclusions

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 excluded if they contain any added seasoning/flavouring, (including other than salt).

Overview of responses

Seven of 10 respondents indicated they were satisfied with the current definition for this food category. The following suggestions were made from those who determined changes were required:

- Exclude natural or organic products which don't contain food additives.

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- Make the definition clearer with regard to whether 'plain' includes lightly salted or salted products. Are these products include in this category or in 'Flavoured biscuits, crackers and corn cakes'?
- Remove the term 'soda biscuit' and replace with 'plain savoury biscuits'.
- Clarify what is meant by 'includes pepper varieties, but not those with added salt flavours'.
- Include pepper flavoured crackers under 'flavoured crackers' category.
- Include plain rice crackers in this food category rather than 'flavoured crackers', because there is no more salt in a plain rice cracker compared to a Jatz or Sao. The statement should be changed to 'rice crackers are excluded if they contain added seasoning/flavouring'.

The George Institute for Global Health state that, based on analysis of FoodSwitch data and consideration of the UK 2017 and FHD sodium targets, the target could be set lower at 450mg/100g. This is supported by the Victorian Government department and the World Action on Salt and Health public health group.

Five of nine respondents couldn't identify any technical constraints associated with reformulation in this food category. However, of those who did, the role of sodium in maintaining shape, integrity, texture, consistency, taste and other characteristic properties of savoury crackers and biscuits was raised as a challenge for reformulation, i.e. a reduction in sodium may compromise the consumer acceptance of these products. DAA highlights the role of sodium in crispbread, i.e. it is required in binding and absorbing ingredients and its removal would leave the dough sticky and unable to be rolled out to make a cracker or crispbread. The GLNC state the role of sodium differs across products and no one ingredient is capable of replacing the multiple functions of sodium, e.g. potassium chloride is expensive, less effective and imparts a bitter taste. Moreover, the use of artificial ingredients is often unacceptable to consumers. Woolworths highlight that there is greater consumer acceptance for saltier crackers than low-salt varieties. The AFGC states that the further research and technology is needed to successfully reformulate products without compromising consumer acceptance. DAA also support the communication of appropriate messages and education to health professionals and consumers, highlighting the benefits and importance of food reformulation, including alternatives such as lemon, vinegar or herbs and spices as salt replacements.

The AFGC raise concern about the commercial viability of expecting companies to reformulate 100% of their portfolio, particularly those products which are not high sellers. If companies do not reformulate all products there may be a negative consumer perception which will also affect commercial viability. Woolworths supports that companies should be able to nominate 95% of their products for reformulation in the timeframe, and be required to reduce the salt content of the remaining 5% as much as possible. This is also supported by GLNC. Both the AFGC and the GLNC do not believe the four year timeframe is feasible if all products in a companies' portfolio need to be reformulated. DAA supports an incremental rollout.

Summary of Recommendations for Food Category 23: Savoury biscuits – plain savoury crackers and soda biscuits

It is important to consider the following recommendations are predominantly from participants that have responded unfavourably to the reformulation targets. They should be considered in the context of the data collected from all participants.

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Table 24: (plain savoury crackers and biscuits) Consultation recommendations and RWG decisions

| Type of recommendation | Specific recommendation | RWG notes |
|-------------------------------|---|--|
| Amend definition | Clarify definitions of terms including 'plain', 'soda biscuit' and 'pepper varieties'. | Pepper flavoured or salt seasoned are included as 'plain', but products marketed as salt flavoured (e.g. sea salt and rosemary) are excluded {included in 'flavoured category'}. Soda biscuits have been removed from the definition, but are considered as an included product. |
| | Exclude 'pepper varieties' and natural or organic varieties which don't include artificial ingredients. | Organic products are not excluded. |
| | Include 'plain rice crackers' in this food category. | Agree, clarified in definition that plain rice crackers with salt seasoning are included in this category. |
| Amend approach | Incremental reductions. Companies to nominate a proportion of their portfolio for reformulation. | RWG is proposing single end-point targets, and emphasises that industry has flexibility to implement according to their own internal product development cycles – this may involve incremental changes. |
| Further consultation/research | Targeted consultation with industry, and further research to determine technology required for successful reformulation. | |
| Education | Communicate to health professionals and consumers regarding the benefits of reformulation, and the use of alternatives to add flavour, e.g. lemon, vinegar or herbs and spices. | Noted but considered unlikely to be suitable for plain products |
| Timeframe | Increase. | 4 year implementation period |
| | Organisations to provide annual progress reports starting in 2019, in which potential challenges are identified to inform future requirements. If voluntary reformulation progress is not meaningful in terms of reduction in overall sodium in these items, government regulation should be enforced. If reductions are meaningful, then target should continue to be reduced progressively. | As consulted on, companies will be asked to report to the IMERG at 2yrs and after 4yrs. RWG acknowledge an interest in being able to report early successes of the Reformulation Program, but believe that companies who want to talk publicly about their progress will do so. |
| Reduce target | Reduce to 450mg | RWG considered other ways to categorise the savoury biscuits. On balance confirm these three categories. Based on available FoodTrack data and technical limitations noted in submissions, 450mg is considered too challenging. RWG confirm the 630mg target |

3.3.24 Category 24: Savoury biscuits – plain corn, rice and other ‘grain-cake’ biscuits

Definition: Plain, savoury corn, quinoa or rice-based cakes which are shelf-stable and ready-to-eat.

ENDORSED TARGET: A reduction in sodium across defined products to 270mg/100g by 30 June 2024.

Inclusions

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.

Exclusions

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.

Overview of responses

Five respondents indicated that the definition for this food category was inappropriate. Of these, three (the Victorian Salt Reduction Partnership; the George Institute for Global Health; World Action on Salt and Health) expressed a strong recommendation to revise the definition and inclusion and exclusion criteria. Specifically, the definition needs to clarify if ‘flavouring’ includes salted products, and whether salted and lightly salted products are included in this food category, or in food category #21 (Savoury biscuits – flavoured biscuits, crackers and corn cakes). A member of the public expressed the need for clarification regarding whether natural and traditional are included and indicated a preference for the inclusion of only products that contain artificial food additives. In addition, they felt that the term ‘cake’ should be removed to avoid confusion and suggested ‘puffed grain biscuits’ as a replacement. In contrast, an industry group asserts the need to avoid the term ‘corn thins’ and change to ‘corn cakes’ (and/or ‘wafers’ as this is the term used for this item in New Zealand. They also suggested the addition of the term ‘popped’ to the description ‘puffed’.

There were 10 responses to the question regarding the identification of potential technical constraints which could negatively influence the reformulation of products in the ‘Savoury biscuits – plain, corn, rice and other cakes’ food category, within the reformulation timeframe. Seven respondents could not identify any potential technical constraints. A member of the public reported concern regarding the use of sodium as a preservative in this food group was identified as a potential issue regarding food safety, and the respondent indicated their concern that reducing sodium could result in a shorter shelf life and therefore greater food wastage. Additionally, salt provides flavour in this group. The respondent asserts the importance of avoiding replacing sodium with an artificial ingredient, this respondent also raised this concern in a subsequent response. Another respondent expressed concern regarding technical issues, and elaborated by highlighting the role of sodium in these items for maintaining characteristic physical properties and taste profile. Replacement of sodium could be expensive, less effective and increase the artificiality, and may not meet consumer preferences.

Four of 10 respondents did not identify any potential concerns or challenges associated with sodium reformulation of items in this food category. Three respondents suggested the sodium target was too conservative. This is based on research investigating the sodium profile of products on the market currently using the FoodSwitch database which has a higher number of products than that in the Food Track database used in the development of the sodium target. The findings suggest the mean sodium content of items in this group is 55% higher using data from the Food Switch database than

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the Food Track database. Three participants identified concerns with a potential public health risk, and individual respondents expressed concern regarding reduced consumer acceptance, increased artificiality, and lack of feasibility for companies for which items in this category represent a small market share. Importantly, one respondent also queried whether reformulation of items in this category would have a significant impact on the sodium intake of Australians. Participants identifying concerns and challenges were also invited to suggest potential solutions, which are addressed at the end of this section.

Five participants indicated they did not believe that the timeframe (four years) was reasonable for the reformulation of products in the 'Savoury biscuits – plain, corn, rice and other cakes' food category, whilst four determined that it was a reasonable timeframe (although one public health organisation conceded they did not have understanding regarding manufacturing concerns and challenges). Recommendations for amending the timeframe appear below.

Summary of Recommendations for Food Category 24: Savoury biscuits – plain, corn, rice and other cakes

It is important to consider the following recommendations are predominantly from participants that have responded unfavourably to the reformulation targets. They should be considered in the context of the data collected from all participants.

Table 25: (plain, corn, rice and other grain-cake biscuits) Consultation recommendations and RWG decisions

| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|--|--|
| Amend definition | Clarify if 'flavouring' includes salted products, and whether salted and lightly salted products are included in this food category, or in food category #21 (Savoury biscuits – flavoured biscuits, crackers and corn cakes). | Lightly salted / seasoned grain 'cake-style' biscuits are included in this category. Other 'flavours' are in the flavoured biscuits, crackers and cakes category. Plain and unseasoned rice cakes are excluded from all targets, as they are so low in sodium that the targets have no impact. |
| | Include only products that contain artificial food additives. | Noted. |
| | Replace 'cake' with 'puffed grain biscuits'. | 'Thins' are provided as an example of product. Many other categories provide examples of specific products. |
| | Avoid using 'corn thins' and replace with 'corn cakes' or 'wafers'. | |
| | Add 'popped' to discussion regarding 'puffed' items. | |
| Amend target | Reduce target to 90mg/100g. | RWG considered other ways to categorise the savoury biscuits. On balance confirm these three categories. 90mg is considered too challenging. RWG confirm the 270mg target. |
| Amend approach | Companies to nominate the proportion of products within their range for reformulation in four-year timeframe, with a view to reformulation of more items in their range after further investigation into feasibility. | RWG is proposing single end-point targets, and emphasises that industry has flexibility to implement according to their own internal product development cycles – this may involve incremental changes. |

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| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|---|--|
| Timeframe | Organisations to provide annual progress reports starting in 2019, in which potential challenges are identified to inform future requirements. If voluntary reformulation progress is not meaningful in terms of reduction in overall sodium in these items, government regulation should be enforced. If reductions are meaningful, then target should continue to be reduced progressively. | As consulted on, companies will be asked to report to the IMERG at 2yrs and after 4yrs. RWG acknowledge an interest in being able to report early successes of the Reformulation Program, but believe that companies who want to talk publicly about their progress will do so. |

3.3.25 Category 25: Savoury biscuits – flavoured savoury biscuits, crackers and ‘grain-cake’ biscuits

Definition: Flavoured or salted savoury grain-based biscuits, crackers and cakes which are shelf-stable and ready-to-eat.

ENDORSED TARGET: A reduction in sodium across defined products to 720mg/100g by 30 June 2024.

Inclusions

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).

Exclusions

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/plain crackers and plain biscuits, plain crispbreads (e.g. Ryvita, Cruskits), other varieties (e.g. water/wafer crackers). Excludes products where salt (alone) is used as a ‘seasoning’/ lightly salted products.

Overview of responses

Seven of 11 respondents indicate the definition is appropriate for this food category. One respondent asserted that ‘Corn thins is a brand name and so should be referred to as ‘corn cakes’ or ‘popped cakes’, or could remove the term ‘cake’ and replace with biscuit. Woolworths also suggests the title of this food category should be changed to ‘Flavoured savoury crackers, biscuits and other cakes’ to align with the titles of other food categories. They express confusion about including ‘corn cakes’ in the title when rice and other grain based cakes are also included. The George Institute for Global Health seeks clarification of the inclusion and exclusion criteria, asserting that the definition should be clearer as to whether ‘flavouring’ includes salted and lightly salted products. They believe it is unclear whether these products are included in ‘Savoury biscuits’ (sub-category one or two) or the current category. Woolworths believe that other whole grain snacks should also be included in this category (e.g. VitaWeat cracker chips) rather than in the ‘Savoury snacks’ category with vegetable and legume chips. The rationale for this is that salt is used for texture in the wholegrain snacks where it is only used for flavour in vegetable or legume chips.

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The George Institute for Global Health suggests a further reduction in the sodium target for this food category to 540mg/100g. This is supported by two public health groups (Victorian Government department and World Action on Salt and Health) and is based on FoodSwitch data. The Food Safety Unit and Prevention and Population Health Branch (Victorian government) also notes that the target is above the Healthy Choices and National Healthy School Canteens guidelines, and suggests that the target align with these.

Food safety and technical issues were raised by participants as potential barriers to reformulation. Sodium is required as a preservative, for texture and as a raising agent in some styles of crackers. Salt is also an important source of flavour for these products. Both a member of the public and Woolworths raised concern that sodium may be replaced with artificial ingredients which may not be accepted by consumers. There is concern that the category contains a wide variation of products with significantly different sodium profiles. Reformulation will be more technically difficult for higher sodium products. Multiple respondents suggest that companies be permitted to nominate 95% of products in their portfolio for reformulation, whilst attempting to reduce the other 5% as much as is possible without compromising quality and safety.

The majority of feedback supported a four-year timeframe for reformulation in this category. However, the Food Safety Unit and Prevention and Population Health Branch (Victorian government) suggested that the reformulation could be achieved in a shorter timeframe given existing guidelines for sodium reduction. In contrast the AFGC stated that four years may not be long enough for reformulation of some products with a higher sodium content. An incremental rollout of the target is supported by DAA and the AFGC.

Summary of Recommendations for Food Category 25: Savoury biscuits – flavoured biscuits, crackers and corn cakes

It is important to consider the following recommendations are predominantly from participants that have responded unfavourably to the reformulation targets. They should be considered in the context of the data collected from all participants.

Table 26: (flavoured savoury biscuits, crackers and cake-style' biscuits) Consultation recommendations and RWG decisions

| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|--|---|
| Amend definition | Change 'corn thins' to 'corn cakes' or remove 'cakes' altogether and replace with 'biscuits'. | Amended |
| | Change title of the food category to 'Flavoured savoury crackers, biscuits and other cakes'. | |
| | Clarify the inclusion/exclusion of salted and lightly salted products, and whether flavouring refers to these. | Lightly salted products are considered to be 'plain' and fit in the two previous sub-categories depending on whether it's a biscuit or 'cake-style' biscuit. |
| | Include other whole grain snacks in this category rather than in the 'Savoury snacks' category. | RWG considers that whole-grain snacks are marketed alongside other savoury snacks, for a different eating occasion, and have retained in the savoury snacks sub-category. |
| Amend target | Reduce to 540mg/100g. | RWG considered alternate ways to categorise the savoury biscuits categories. Based on available product data RWG confirm the target of 720mg |

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| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|---|--|
| Amend approach | Companies nominate 95% of their portfolio for reformulation and reduce sodium as much as possible in remaining 5%. | RWG is proposing single end-point targets, and emphasises that industry has flexibility to implement according to their own internal product development cycles – this may involve incremental changes. |
| | Phased/incremental reformulation. | |
| Timeframe | Organisations to provide annual progress reports starting in 2019, in which potential challenges are identified to inform future requirements. If voluntary reformulation progress is not meaningful in terms of reduction in overall sodium in these items, government regulation should be enforced. If reductions are meaningful, then target should continue to be reduced progressively. | As consulted on, companies will be asked to report to the IMERG at 2yrs and after 4yrs. RWG acknowledge an interest in being able to report early successes of the Reformulation Program, but believe that companies who want to talk publicly about their progress will do so. |

3.3.26 Category 26: Savoury pastries – dry pastries

Definition: Dry meat, vegetable or dairy filling encased in a pastry.

ENDORSED TARGETS:

Sodium - A reduction in sodium across defined products to 500mg/100g by 30 June 2024.

Saturated Fat – A reduction in saturated fat across defined products to 7g/100g by 30 June 2024.

Inclusions

Sausage rolls, meat or vegetable pasties, savoury pastries/rolls (e.g. chicken & vegetable, spinach & cheese, ham & cheese), single-serve and party variety pasties and sausage rolls, quiche, pastizzi. Includes gluten-free varieties.

Exclusions

Frittatas, processed meats, pastry cases or bases without fillings (e.g. vol au vent or spring roll wrappers), sweet pastries, Asian pastries (e.g. dumplings, wontons, spring rolls) and filled vol-au-vents. All wet pastry dishes including, meat or vegetarian pies (in a gravy base, all flavours).

Overview of responses

Only two respondents indicated they did not agree with the proposed definition for this food category. One industry group indicates the need for further clarification of the inclusion and exclusion criteria. In particular, samosas should be included in the definition despite being classified as an Asian pastry. The Food Safety Unit and Prevention and Population Health Branch (Victorian government) highlights that the proposed definition is inconsistent with the existing Healthy Choices and National Healthy School Canteens guidelines nutrient criteria for pastries which do include pastizzi, Asian pastries and filled vol-au-vents. They suggest they should be included given they often have a high sodium content.

Feedback on sodium target

The George Institute for Global Health expresses that the target could be set lower at 450mg/100g based on evidence from analysis of FoodSwitch data as well as consideration of the UK 2017 sodium

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target, and the HSR and FHD guidelines. This recommendation is supported by the World Action on Salt and Health. The Food Safety Unit and Prevention and Population Health Branch (Victorian government) also supports the lowering of the target, stating that it should align with the Healthy Choices and National Healthy School Canteens guidelines (400mg/100g).

Feedback from respondents regarding technical constraints focused on the functional role of sodium in foods. DAA supports the reformulation target but note the actions of sodium as an emulsifier, preservative and flavour enhancer in these foods. They encourage manufacturers to consider innovative techniques to achieve this and for the use of potassium chloride as a replacement in dry pastries, alongside other natural flavour enhancers. However, the AFGC asserts that the role of sodium in the integrity, structure and texture of pastry means that it would be very difficult to meet from both a technical and a consumer expectation perspective. In particular, they state that sodium is needed for the successful sheeting of pastry when manufactured on a large scale, to prevent splitting and breaking. Sodium compounds are also a key component of binding agents and emulsifiers used in fillings and these are integral to product manufacture, palatability, textural qualities and consumer acceptance. A company also states that industry have already established a sodium threshold baseline, below which products are not acceptable to consumers. Sodium replacements are not successful as replacements. They also highlight that many of the products which would be affected by sodium reformulation are iconic parts of companies' portfolios and have been in production for decades.

Five of nine respondents indicated that they believed the four-year timeframe for this target is reasonable. Given the existence of the UK 2017 sodium target and the Healthy Choices and National Healthy School Canteens guidelines, suggest that the timeframe could be shorter but in contrast, the AFGC suggests that it will not be possible to achieve reformulation in this time. A potential solution suggested by the AFGC is for companies to be allowed to nominate 95% of their range for which reformulation is possible.

Feedback on Saturated fat target

The Food Safety Unit and Prevention and Population Health Branch (Victorian government) highlights that the proposed target does not align with the existing Healthy Choices and National Healthy School Canteens guidelines, and therefore recommends it be reduced to 5g/100g. The George Institute consider the target feasible based on their analysis of FoodSwitch data which showed that the mean saturated fat content of these products (on the market) was 7.2g/100g and 31% of products already meet the target.

As for the previous categories, a member of the public expressed concern regarding the evidence for the need to reduce saturated fat. An industry member indicated that it might be difficult to influence the saturated fat content of some ingredients due to them being manufactured by, and purchased from other companies.

AFGC noted that some of their members were already working towards reducing saturated fat to 7g/100g and to reduce trans fats. They reiterate the importance of acknowledging these efforts. However, they also state that other members may find this target difficult to achieve, in particular those that use butter in puff pastry products. Woolworths also states the importance of the type of fat used in the pastry, meaning butter-based pastries have a higher saturated fat content and this will be difficult to change. They note the technical difficulties of reducing saturated fat in dry pastries due to their higher ratio of pastry to filling. Likewise, if fillings include cheese or cream as characterising ingredients these would also contribute to the overall saturated fat content. For these products, the AFGC recommends flexibility in the target.

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Although in support of the reformulation, the DAA notes the importance of fats in foods and cooking and that a reduction in these foods could lead to a dryer product that is less acceptable to consumers, and could also reduce shelf life. Coles also identified the need for saturated fat in order to create an appropriate texture in these products. But they argue (in contrast to the AFGC) that much of the saturated fat actually comes from fillings (especially meat) and this could only be decreased by reducing the amount of meat in the product. Thus, Coles determine saturated fat reformulation to be a significant challenge. Woolworths mentions that changing the type of meat to a lower fat type will lead to a dryer product overall.

DAA provided detailed information about the roles of fats in these products and some useful recommendations for how the target could still be achieved despite significant challenges. They recommend the use of extra virgin olive oil in pastries but acknowledge the higher cost of this ingredient. Other suggestions are to use emulsifiers added to oils, use mono- and poly- unsaturated fats such as Rice bran oil in bread products, and to use inulin and oligosaccharides in some dough products. They also indicate that further research is required to investigate the use of a fat substitute called 'Organogels'. The DAA encourages companies and researchers to consider new and innovative ways to develop products to meet the target.

The respondents provided mixed feedback with regard to the appropriateness of the four-year timeframe for reformulation. Some indicated longer would be needed, especially to allow for an incremental implementation of the reformulation process. Whilst others suggested the timeframe would be achievable.

Targeted consultation responses

The Department conducted targeted consultation on moving quiches and pastizzi into this category from the wet pastries category. This move was supported by stakeholders.

Summary of Recommendations for Food Category 26: Savoury pastries – dry pastries

It is important to consider the following recommendations are predominantly from participants that have responded unfavourably to the reformulation targets. They should be considered in the context of the data collected from all participants.

Table 27: (dry pastries) Consultation recommendations and RWG decisions

| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|---|---|
| Amend definition | Include pastizzi, Asian pastries and filled vol-au-vents. | <p>RWG has reviewed the available FoodTrack data and agrees that the sodium levels of pastizzi (324-629mg/100g, mean 390mg/100g) are comparable and should be included in this category.</p> <p>Quiche will also be added (reflective of comments in wet pastry category). (Sodium range 340-617mg/100g, mean 453mg/100g).</p> <p>The RWG is not aware of any pre-filled vol-au-vents sold at the retail level and considers that these would be a small contributor to population intakes.</p> <p>There is a wide range of types of Asian pastries which could be considered</p> |

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| Type of recommendation | Specific recommendation | RWG notes |
|-----------------------------|---|--|
| | | (e.g. spring roll, samosa, pakora, bhaji, gyoza) however the wrappings are quite different to 'pastry', and the filling is often a larger proportion of the product. At the retail level these products are considered to be a low contributor to total population dietary intakes of sodium and saturate fat; although it is noted that the contribution may be higher for sub-populations. |
| Amend sodium target | Reduce to 450mg/100g. | Available FoodTrack data was reviewed, with the addition of quiche and pastizzi to this category, and RWG agree to retain the 500mg/100g target for sodium. |
| | Reduce to 400mg/100g. | |
| Amend saturated fats target | Reduce to 5g/100g | Retain 7g, target allows for sat fat from pastry or meat / dairy content in the varied product types. Saturated fats target is the same for wet and dry pastries. |
| Amend approach | Companies nominate 95% of their portfolio for reformulation and reduce sodium as much as possible in remaining 5%. | RWG is proposing single end-point targets, and emphasises that industry has flexibility to implement according to their own internal product development cycles – this may involve incremental changes. |
| | Do not reformulate. | Noted. |
| Education | Encourage the replacement of fats with other ingredients as described above. Encourage industry to consider new and innovative options. | Industry is best placed to determine how to conduct reformulate individual products. |
| Timeframe | Reduce. | As consulted on, companies will be asked to report to the IMERG at 2yrs and after 4yrs. RWG acknowledge an interest in being able to report early successes of the Reformulation Program, but believe that companies who want to talk publicly about their progress will do so. |
| | Organisations to provide annual progress reports starting in 2019, in which potential challenges are identified to inform future requirements. If voluntary reformulation progress is not meaningful in terms of reduction in overall sodium in these items, government regulation should be enforced. If reductions are meaningful, then target should continue to be reduced progressively. | |

3.3.27 Category 27: Savoury pastries – wet pastries

Definition: Wet meat, vegetable or dairy filling encased in a pastry.

ENDORSED TARGETS:

Sodium - A reduction in sodium across defined products to 400mg/100g by 30 June 2024.

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Saturated Fat – A reduction in saturated fat across defined products to 7g/100g by 30 June 2024.

Inclusions

Meat or vegetarian pies (in a gravy base, all flavours), includes gluten-free varieties.

Exclusions

Pizzas, calzones, pizza pockets, pastry cases or bases without fillings (e.g. vol-au-vent or spring roll wrappers), sweet pastries. All dry pastries including sausage rolls, meat or vegetable pasties and savoury pastries/rolls, quiche, pastizzi.

Overview of responses

Eight of 10 respondents indicated that they agreed with the definition for this food category. Both Woolworths and the AFGC query whether quiches should be included in this category due to them being very different to other items in this category. They are not fully encased in a pastry and have a solid rather than wet filling and are therefore it is more appropriate to include these in the dry pastry category.

Feedback on sodium targets

The Food Safety Unit and Prevention and Population Health Branch (Victorian government) highlights that the proposed target is lower than the existing Healthy Choices and National Healthy School Canteens guidelines (400mg/100g). The AFGC suggests a higher target be set based on industry feedback. In contrast, the George Institute for Global Health supports the proposed target. This is based on analysis of FoodSwitch data and the UK 2017 sodium, HSR and FHD targets.

Similar to the 'Savoury pastries – dry pastries' category, the functional role of sodium in products in this food category was raised as contributing to a technical constraint to reformulation. In particular, sodium is required for pastry sheeting and is a key ingredient in binding agents and emulsifiers needed for the filling of these products. Woolworths specifies that sodium reduction in products that use full butter pastry will be more difficult than for other products. DAA agrees that there will be significant difficulties in reformulation of items in this category but support the target. A member of the public also highlighted that the reduction of sodium in this category could lead to replacement with artificial ingredients.

Consumer acceptance was raised as a considerable concern for reformulation of products in this category, particularly for iconic products for which consumers have strong expectations regarding quality. The AFGC indicates that reformulation trials have already identified limitations. Woolworths states that most quiches on the market contain substantially more sodium than the target and are unlikely to be accepted by consumers if reformulated. DAA, in support of the target, suggest that potassium-based products could be used as a replacement for sodium in conjunction with flavour enhancers. Some companies do not have the capacity to influence the manufacture of ingredients/products which are produced elsewhere.

Woolworths suggests that companies should be able to nominate 95% of their portfolio for reformulation and aim to reduce the sodium content of the remaining 5% as much as possible. DAA suggests the incremental introduction of the targets across this food category. The timeframe should be informed by advice from food technologists and industry. In contrast, it is suggested that given the existence of the FHD and UK 2017 sodium targets and Healthy Choices and National Healthy School Canteens guidelines, that the proposed reformulation could be achieved more quickly than the four-year timeframe.

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Feedback on saturated fats target

As per the previous section, the Food Safety Unit and Prevention and Population Health Branch (Victorian government) highlights that the proposed target does not align with the existing Healthy Choices and National Healthy School Canteens guidelines, and therefore recommends it be reduced to 5g/100g. This is supported by the George Institute, based on their analysis of FoodSwitch data.

The AFGC reports that their members are in general, able to meet the proposed target for several products but again state that it will be more difficult for products with cheese or cream as the characterising ingredient in fillings to meet the target. They suggest flexibility in the target for these products. They also note that for some companies, the authenticity/identity of their products could be influenced by a reduction in saturated fat. As for the previous category, Coles indicates that saturated fat is an ingredient in the meat fillings of some of their products and a reduction would require less meat in the product. Woolworths highlights that lower fat meat will likely lead to a dryer pastry which may be less acceptable to the consumer. Butter-containing pastries will also be more difficult to influence in terms of saturated fat profile. Woolworths suggest that the target should allow for 5% of products in a company's portfolio to have a higher saturated fat content than the target. The DAA notes the importance of saturated fat in achieving a sufficiently moist product, but encourage companies to consider new and innovative ways to reduce fat content so as to meet the target. The ideas for saturated fat replacements noted in the previous section are also applicable to these products.

Targeted consultation responses

The Department conducted targeted consultation on moving quiches and pastizzi into the dry pastries category, and revising the sodium target for wet pastries to 400mg/100g. This was supported by stakeholders.

Summary of Recommendations for Food Category 27: Savoury pastries – wet pastries

It is important to consider the following recommendations are predominantly from participants that have responded unfavourably to the reformulation targets. They should be considered in the context of the data collected from all participants.

Table 28: (wet pastries) Consultation recommendations and RWG decisions

| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|--|--|
| Amend definition | Exclude quiche. | Agree. |
| Amend approach | Incremental reformulation. | Industry flexibility within 4yrs. |
| | Companies should be able to nominate 95% of portfolio for reformulation and reduce sodium as much as possible in remaining 5%. | RWG is proposing single end-point targets, and emphasises that industry has flexibility to implement as they see fit, which may include incremental changes. |
| Further consultation | Targeted consultation with industry to identify achievable target. | RWG considers the target to be feasible, and is conducting targeted consultation on amendments now proposed in response to the 2018 public consultation. A higher sodium target of 400mg/100g was proposed and further targeted consultation conducted. |

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| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|---|--|
| Education | Encourage the replacement of fats with other ingredients as described above. Encourage industry to consider new and innovative options. | Noted. Industry is best placed to determine how to reformulate individual products. |
| Timeframe | Reduce. | Retain 4yr implementation period. |
| | Organisations to provide annual progress reports starting in 2019, in which potential challenges are identified to inform future requirements. If voluntary reformulation progress is not meaningful in terms of reduction in overall sodium in these items, government regulation should be enforced. If reductions are meaningful, then target should continue to be reduced progressively. | As consulted on, companies will be asked to report to the IMERG at 2yrs and after 4yrs. RWG acknowledge an interest in being able to report early successes of the Reformulation Program, but believe that companies who want to talk publicly about their progress will do so. |
| Amend target | (consequential) | Although the target seemed appropriated based on consultation, reconsideration of the data following definitional changes indicated that almost 75% of products would need to reformulate to meet the 360mg target. A revised target of 400mg is therefore considered to be more feasible. |

3.3.28 Category 28: Savoury snacks – potato snacks

Definition: Thin potato slices 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.

ENDORSED TARGET: A reduction in sodium across defined products to 500mg/100g by 30 June 2024.

Inclusions

Potato crisps (all flavours except salt & vinegar)/ includes thick, thin, crinkle, sticks, deli-style, potato straws and Pringles. Includes sheeted and re-formed potato snacks

Exclusions

Salt and vinegar flavoured potato crisps and straws, processed flavoured snacks, corn chips, popcorn, vegetable- or legume-based snacks, savoury biscuits, crackers or cakes and extruded snacks.

Overview of responses

Eight of 10 respondents agreed with the current definition. However, two industry groups (the AFGC and Woolworths) indicate there needs to be greater clarification and accuracy of the definitions, inclusions and exclusions. The AFGC highlights thin potato slices are included in the definition but also includes Pringles which are fabricated potato rather than potato slices. Woolworths does not believe plain and flavoured potato snacks should be included in the same category given the target is low and suggest that a higher target be allowed for flavoured potato snacks. If both are included in the category then it should be increased to 550mg/100g (as per the FHD target).

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The George Institute for Global Health suggests the sodium target be reduced to 450mg/100g for this food category. This is based on FoodSwitch data. The Institute concedes this is an ambitious target given the proposed target is already set below the FHD and UK 2017 sodium targets. They highlight that the proposed target is not set at a HSR cut-point.

Woolworths highlights that reduced sodium content in their products will not allow them to compete with products containing MSG. The AFGC states that the target will not be achievable for 100% of the items in the food category. They note previous reductions in the sodium content in this category but that further reductions are likely to negatively impact consumer acceptance. These products only contain a small number of ingredients and rely on seasoning to differentiate between various flavours. The AFGC asserts the need to change the approach to reformulation in this food category. They suggest revision of the target, the introduction of a range of targets and/or allowing companies to nominate a proportion of portfolio for which they believe reformulation will be possible and then attempt to reduce sodium as much as possible in the remaining products. This approach should be informed by further targeted consultation with manufacturers. Innovation is also suggested as a potential solution, with new low-sodium products being developed.

Summary of Recommendations for Food Category 28: Savoury snacks – potato snacks

It is important to consider the following recommendations are predominantly from participants that have responded unfavourably to the reformulation targets. They should be considered in the context of the data collected from all participants.

Table 29: (potato snacks) Consultation recommendations and RWG decisions

| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|---|--|
| Amend definition | Separate plain and flavoured potato snacks into sub-categories. | No, S&V already separated, most others fairly similar. Includes reformed potato such as Pringles. |
| Amend target | Increase. | RWG note that New Zealand will soon begin consultation on a 520mg target for this category, based on sales-weighted data of the New Zealand market. RWG consider 520 too high, based on the available FoodTrack and FoodSwitch product data. |
| | Reduce to 450mg/100g. | 500mg is considered to be challenging based on feedback, roughly 1/3 of products currently meet this target. |
| Amend approach | Set a minimum and maximum value for the category. | Noted, RWG prefers to set maximum rather than % reduction or average maximum content targets. |
| | companies can nominate a proportion of their portfolio for reformulation. | RWG is proposing single end-point targets, and emphasises that industry has flexibility to implement according to their own internal product development cycles – this may involve incremental changes. |
| | Incremental reformulation. | RWG is proposing single end-point targets, and emphasises that industry has flexibility to implement as they see fit, which may include incremental changes. |

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| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|---|--|
| Further consultation | Further targeted consultation with manufacturers to establish achievable target. | |
| Innovation | Encourage manufacturers to develop new low-sodium product options. | New product development of lower sodium products is encouraged. The reformulation target will hopefully encourage a new basis for this. |
| Timeframe | Increase. | Retain 4yr implementation period. |
| | Organisations to provide annual progress reports starting in 2019, in which potential challenges are identified to inform future requirements. If voluntary reformulation progress is not meaningful in terms of reduction in overall sodium in these items, government regulation should be enforced. If reductions are meaningful, then target should continue to be reduced progressively. | As consulted on, companies will be asked to report to the IMERG at 2yrs and after 4yrs. RWG acknowledge an interest in being able to report early successes of the Reformulation Program, but believe that companies who want to talk publicly about their progress will do so. |

3.3.29 Category 29: Savoury snacks – salt and vinegar snacks

Definition: All snack products salt & vinegar flavoured and sold as ready-to-eat. Includes potato-, corn-, rice-, vegetable-based snacks.

ENDORSED TARGET: A reduction in sodium across defined products to 810mg/100g by 30 June 2024.

Inclusions

Potato-, corn-, vegetable-, grain-based and extruded snacks flavoured with salt and vinegar flavouring. Includes popcorn.

Exclusions

All non-salt and vinegar flavoured snacks (e.g. potato crisps, processed flavoured snacks, corn chips, popcorn, vegetable- or legume-based snacks, savoury biscuits, crackers or cakes, extruded snacks and nuts (including salted)).

Overview of responses

All 10 respondents indicate the appropriateness of the definition for this food category. The George Institute for Global Health support the proposed target based on consideration of FoodSwitch data, the UK 2017 and FHD sodium targets and the HSR cut-points. The Food Safety Unit and Prevention and Population Health Branch (Victorian government) suggests the target could be reduced further given the Healthy Choices and National Healthy School Canteens guidelines have a lower target. In contrast, Woolworths does not support reformulation in this category due to the challenges highlighted below.

The AFGC is the only respondent to elaborate on the technical constraints influencing reformulation in this category. They state that technology and reduced consumer acceptance are likely to be challenges in this category because the product is historically identified as a salty tasting snack. They

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suggest that more research is required in order to identify options for replacement options for sodium.

Woolworths highlights that they have previously trialled sodium reduction in this category and identified that consumers do not accept the change in quality, and predict that industry will be less likely to engage in reformulation if the target is too low as they will not be able to compete with other companies that have not reformulated.

Industry groups (including the AFGC) suggest a longer timeframe will be required to achieve reformulation, whereas and indicate that existing targets mean that a shorter timeframe may be achievable. DAA suggests incremental implementation of the target, and another potential solution is to allow companies to nominate a proportion of items in their portfolio for reformulation.

Summary of Recommendations for Food Category 29: Savoury snacks – salt and vinegar snacks

It is important to consider the following recommendations are predominantly from participants that have responded unfavourably to the reformulation targets. They should be considered in the context of the data collected from all participants.

Table 30: (salt and vinegar snacks) Consultation recommendations and RWG decisions

| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|---|--|
| Amend target | Reduce. | RWG notes that New Zealand is proposing 740mg/100g sodium target but consider 810mg may be challenging enough based on Australian industry feedback and product data. |
| Amend approach | Do not reformulate. | Noted. |
| | Incremental reformulation. | Industry flexibility within 4yrs. |
| | Companies to nominate a proportion of their portfolio for reformulation. | RWG is proposing single end-point targets, and emphasises that industry has flexibility to implement according to their own internal product development cycles – this may involve incremental changes. |
| Timeframe | Increase. | Retain 4yr implementation period. |
| | Reduce. | |
| | Organisations to provide annual progress reports starting in 2019, in which potential challenges are identified to inform future requirements. If voluntary reformulation progress is not meaningful in terms of reduction in overall sodium in these items, government regulation should be enforced. If reductions are meaningful, then target should continue to be reduced progressively. | As consulted on, companies will be asked to report to the IMERG at 2yrs and after 4yrs. RWG acknowledge an interest in being able to report early successes of the Reformulation Program, but believe that companies who want to talk publicly about their progress will do so. |

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3.3.30 Category 30: Savoury snacks – extruded and pelleted snacks

Definition: 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.

ENDORSED TARGET: A reduction in sodium across defined products to 720mg/100g by 30 June 2024.

Inclusions

Processed flavoured snacks (e.g. Cheese Puffs, Bacon Balls, Twisties, Burger Rings, Cheezels, Grain Waves, pork rind snacks, prawn crackers).

Exclusions

Potato crisps, processed salt and vinegar flavoured snacks, popcorn, corn-, vegetable- or legume-based snacks. Savoury biscuits, crackers and cakes.

Overview of responses

Nine of 10 respondents indicated the definition for this food category is appropriate. However, the AFGC states that clarification is needed around the inclusions and exclusions, particularly with products such as Grain Waves which has a different product profile and a significantly lower sodium value. It is also unclear if this sub-category includes pellet snacks. They also highlight the huge variation in methods of production, product profile and nutrient value when comparing some products to other products within this category. Sodium mean values within this category vary by up to 800mg/100g between products. The AFGC recommend that similar products in this category are grouped together with separate targets and these should be informed by further targeted consultation with industry.

FoodSwitch data was analysed by the George Institute for Global Health and it was concluded that the proposed target is feasible. Based on this data, the World Action on Salt and Health indicate that the target could be further reduced. Government group (The Prevention, Population Health Branch and the Food Safety Unit, Victoria) also suggest reducing the target given it is above the Healthy Choices and National Healthy School Canteens guidelines.

The AFGC was the only respondent to identify technical constraints to reformulation in this category. They identify the varying roles of sodium in product stability, texture and taste and assert that reducing sodium is likely to negatively influence quality, identity and consumer acceptance. In particular, products with characterising ingredients such as cheese or bacon will have a higher sodium content and should be acknowledged as per the salt and vinegar food category.

Woolworths identifies that the difference in the proposed sodium target and the FHD is substantial and indicates that too much reduction in the sodium content of these products will lead to poor engagement in reformulation by industry. Consumers do not buy these items for health reasons and therefore are unlikely to accept these reductions. Woolworths suggests a 10% reduction over four years in this category.

Summary of Recommendations for Food Category 30: Savoury snacks – extruded snacks

It is important to consider the following recommendations are predominantly from participants that have responded unfavourably to the reformulation targets. They should be considered in the context of the data collected from all participants.

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Table 31: (extruded snacks) Consultation recommendations and RWG decisions

| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|---|---|
| Amend definition | Separate into sub-categories/categories. | Consideration has been given to whether this category, or savoury snacks broadly, can be better split. Retain this category but clarify it includes pelleted. |
| Amend target | Reduce sodium by 10% rather than absolute target or have different targets for sub-categories. | RWG confirms the 720mg target. |
| | Reduce. | |
| Amend approach | Separate into sub-categories with different targets, based on further targeted consultation with industry. | RWG has considered different ways to split the savoury snacks category. Production methods are noted as having some reliance on sodium, e.g. for sheeting, extrusion; however the real differences seem to be with the flavour profiles and sodium added on top of products. |
| | Incremental reformulation. | RWG is proposing single end-point targets, and emphasises that industry has flexibility to implement according to their own internal product development cycles – this may involve incremental changes. |
| Timeframe | Organisations to provide annual progress reports starting in 2019, in which potential challenges are identified to inform future requirements. If voluntary reformulation progress is not meaningful in terms of reduction in overall sodium in these items, government regulation should be enforced. If reductions are meaningful, then target should continue to be reduced progressively. | As consulted on, companies will be asked to report to the IMERG at 2yrs and after 4yrs. RWG acknowledge an interest in being able to report early successes of the Reformulation Program, but believe that companies who want to talk publicly about their progress will do so. |

3.3.31 Category 31: Savoury snacks – vegetable, grains and other snacks

Definition: Vegetable matter (except potato) or cereal grains (~~except corn~~) used to make a dough, which is then sheeted to thin, uniform dimensions and cut to form the snack and fried or baked. Sold as ready-to-eat.

ENDORSED TARGET: A reduction in sodium across defined products to 450mg/100g by 30 June 2024.

Inclusions

Vegetable or legume chips (e.g. beetroot chips, chickpea chips, sweet potato chips), **corn chips**, wholegrain snacks (e.g. multigrain and sea salt VitaWeat Cracker Chips and other wholegrain crisps).

Exclusions

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Biscuits and dip (including cheese dips), potato-based snacks, processed flavoured snacks, ~~corn-based snacks~~, popcorn, pretzels, dry noodle snacks, Bhuja snacks, salt and vinegar-flavoured snacks, extruded snacks. Savoury biscuits, crackers and cakes.

Overview of responses

Eight of 10 respondents indicate that the definition for this category is appropriate. However, the AFGC state that greater clarity is needed in the definition. There is a large variation in products included in this category, which makes it difficult to set one target that is appropriate for all. Some items may be better placed in the Extruded snacks category, and it is not clear why VitaWeat cracker chips are included when other savoury crackers are not. Woolworths does not support a separate category for vegetable or legume chips with a lower target, as they have the same requirement for sodium as other items in the 'potato snacks' category. They also query the inclusion of cracker chips and wholegrain snacks in this category and suggests they are included with 'savoury flavoured biscuits'.

Sodium is required for flavour and texture in this category and reduction may impact consumer acceptance. Large industry group, the AFGC, does not consider the target feasible for 100% of products across a company's portfolio. In contrast, the George Institute for Global Health determines the target is feasible, based on Food Switch data,

Summary of Recommendations for Food Category 31: Savoury snacks – vegetables, grains and other snacks

It is important to consider the following recommendations are predominantly from participants that have responded unfavourably to the reformulation targets. They should be considered in the context of the data collected from all participants.

Table 32: (Savoury snacks – vegetables, grains and other snacks) Consultation recommendations and RWG decisions

| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|--|--|
| Amend definition | Exclude cracker chips and wholegrain snacks. | The eating occasion for these is most similar to chips, rather than savoury biscuits, so considered to best fit here. Sodium range is appropriate in this category. |
| Amend approach | Remove this category as these items should be included in 'potato snacks' category. | These products are often marketed in the 'health foods' aisle and this is a growth category. RWG consider that a lower target is feasible based on available product data. |
| | Incremental reformulation. | RWG is proposing single end-point targets, and emphasises that industry has flexibility to implement as they see fit, which may include incremental changes. |
| Timeframe | Increase. | Retain 4yr implementation period. |
| | Reduce. | |
| | Organisations to provide annual progress reports starting in 2019, in which potential challenges are identified to inform future | As consulted on, companies will be asked to report to the IMERG at 2yrs and after 4yrs. |

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| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|--|---|
| | requirements. If voluntary reformulation progress is not meaningful in terms of reduction in overall sodium in these items, government regulation should be enforced. If reductions are meaningful, then target should continue to be reduced progressively. | RWG acknowledge an interest in being able to report early successes of the Reformulation Program, but believe that companies who want to talk publicly about their progress will do so. |

3.3.32 Food Category 32: Savoury snacks – Popcorn

Corn or maize kernels that have been heated until they burst open and puff out.

ENDROSED TARGET: A reduction in sodium across defined products to 360mg/100g by 30 June 2025.

Inclusions

Popcorn, all flavours except salt and vinegar. Includes microwave varieties.

Exclusions

No added salt varieties, salt and vinegar flavoured popcorn, savoury biscuits, crackers or cakes.

Overview of responses

Six of eleven respondents indicated their acceptance of the current definition for this food category. A member of the public suggested that any items that are natural or organic and don't include artificial ingredients should be excluded from the definition. An industry group assert that items with sea salt flavours should be excluded as they belong better in the salt and vinegar category. One industry group query whether taco shells are included in this category. Multiple respondents indicated they thought that popcorn and corn chips should be in separate categories because of their significantly different processing and flavour profiles. Woolworths state that the target is too low for corn chips but that it is feasible for popcorn. They highlight that the FHD target for cereal based snacks is 550-700mg/100g. The Healthy Choices and National Healthy School Canteens guidelines are also higher than the current target.

Six of ten responses did not identify any technical constraints associated with reformulation in this category. According to the feedback provided, reduced consumer acceptance due to the role of sodium in the taste of these items is the main concern. Consumers expect a particular flavour based on communication on packaging about the taste of the item, and reducing the sodium could result in misleading messages. Cheese-flavoured corn chip varieties which contain real cheese are likely to be particularly difficult to reformulate given the sodium profile of cheese. Two industry groups (including the AFGC) do not believe the target is feasible. Consumers are unlikely to accept artificial sodium replacements. The AFGC recommend that further targeted consultation is required to categorise items appropriately and set a target that is achievable.

In contrast, the George Institute for Global Health states that the target is achievable, based on the analysis of FoodSwitch data. The public health group World Action on Salt and Health believe the target could be more ambitious.

Targeted consultation responses

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The RWG took the following revised targets to targeted consultation:

CORN SNACKS TARGET: A reduction in sodium across defined products to 360mg/100g

POPCORN TARGET: A reduction in sodium across defined products to 300mg/100g

The proposal to split into two categories is supported, however the proposed targets were considered too low by those who responded.

Comments from respondents included:

- HFP targets for sodium for cereal based snacks are 450mg/100g so suggest a similar target for corn snacks and popcorn.
- School canteen guidelines in states other than NSW where HSR is used - have a sodium cut-off of 200mg per serve [corn snacks comment]. Since serve sizes sold in canteens are also restricted to small serve sizes, this equates to a much higher sodium levels per 100g.
- Cheese-based flavoured corn snacks tend to be higher in sodium
- One manufacturer noted that the mean of their current corn snacks portfolio is about 540mg/100g sodium, with no products currently meeting the target 360mg
- Products with sodium values well above 700mg noted as unlikely to be able to meet target.
- Woolworths provides three suggested alternative targets for corn snacks:
 - 520mg - 550mg/100g (in line with the New Zealand Heart Foundation sodium target);
 - 500mg/100g (in line with the Healthy Food Partnership Target for potato chips); or
 - 450mg/100g (mean sodium of the corn snacks category based on FoodTrack data).
- Woolworths also note an HSR-incentive to reformulate popcorn to 360mg; but not to the lower target of 300mg.
- Settling of the salt in packages (popcorn); or uneven coating of products with a lower sodium content.

Summary of Recommendations for Food Category 32: Savoury snacks – corn snacks

It is important to consider the following recommendations are predominantly from participants that have responded unfavourably to the reformulation targets. They should be considered in the context of the data collected from all participants.

Table 33: (Savoury snacks – corn snacks food category) Consultation recommendations and RWG decisions

| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|---|---|
| Amend definition | Clarify inclusion/exclusion of taco shells. | Agree these are excluded – they have a different sodium profile (5-130mg indicatively) and are consumed as part of a meal rather than a snack food. |
| | Separate into sub-categories (corn chips and popcorn). | Corn chips have been grouped with the vegetable, grains and other snacks category. Popcorn is now a separate category. |
| | Exclude sea salt flavoured items from this category and include in salt and vinegar category. | Salt & vinegar flavoured products are excluded from this category. Salt & vinegar flavoured popcorn is expected to meet the target for salt and vinegar snacks. |
| Amend target | Increase target for corn chips. | Corn chips have been grouped with the vegetable, grains and other snacks category, which has a higher target of 450mg. |

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| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|---|--|
| | Reduce. | The target of 360mg was noted in submissions as very challenging. RWG does not agree with the suggestion to further reduce the target. |
| Amend approach | Incremental reformulation. | RWG is proposing single end-point targets, and emphasises that industry has flexibility to implement according to their own internal product development cycles – this may involve incremental changes. |
| Timeframe | Increase. | Retain 4yr implementation period |
| | Reduce. | |
| | Organisations to provide annual progress reports starting in 2019, in which potential challenges are identified to inform future requirements. If voluntary reformulation progress is not meaningful in terms of reduction in overall sodium in these items, government regulation should be enforced. If reductions are meaningful, then target should continue to be reduced progressively. | As consulted on, companies will be asked to report to the IMERG at 2yrs and after 4yrs. RWG acknowledge an interest in being able to report early successes of the Reformulation Program, but believe that companies who want to talk publicly about their progress will do so. |

3.3.33 Category 33: Soups

Definition: 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.

ENDORSED TARGET: A reduction in sodium across defined products to 280mg per 100g/ml by 30 June 2024.

Target is per 100g/ml of product for ready to serve soups; and per 100g/ml of dry or condensed soups that have been made up / diluted in accordance with the on-pack instructions.

Inclusions

Chilled soups, ready-to-eat soups, frozen soups, dry packet soup mixes requiring reconstitution and canned soups.

Exclusions

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).

Overview of responses

Eight of 14 respondents indicated the definition for the 'Soups' food category was reasonable. However, some respondents felt it was unclear whether powdered, reconstituted or ready to serve products were all included. Woolworths suggests packet dried soup should be treated differently to chilled and canned soups as reduction is more difficult due to the lack of other ingredients, these therefore rely on sodium to provide flavour. Woolworths highlights the difficulty of meet the previous

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FHD target of 290mg/100g for this group given they do not use other flavour enhancers. Multiple respondents recommended that the target should be expressed as 'per 100g' or 'per 100mL' depending on the product. Similarly, respondents indicated they were unclear as to whether the target is set 'as sold' or 'as prepared'. One expressed confusion regarding the inclusion of items exclusive to food service.

Two groups (the GLNC and the AFGC) highlight the variability of products in this food category as a barrier to achieving this target for all products. Consistent with this, one industry submission states that the target is likely achievable for instant soups but would be more difficult in other product types. The target is set below the New Zealand Reformulation targets, and it is recommended that it be made consistent with this target because some manufacturers may have already reformulated products based on this target. The New Zealand target is 280mg/100g and a 20% reduction for products significantly above the target. DAA support the achievability of the target but concede that the role of sodium in preservation (particularly those with high water activity) makes reformulation more technically difficult.

The George Institute for Global Health also agrees that the target is feasible based on FoodSwitch data and consideration of the 2017 UK and the FHD target, and notes that the target is set at a HSR cut-point. Based on this information, the World Action on Salt and Health public health group suggest that the target could actually be reduced further.

Technical challenges to reformulation were raised and included that many of these products contain characterising ingredients that are higher in sodium but have a strong influence on consumer acceptance and therefore commercial viability. Replacement of sodium with other artificial ingredients may also not be acceptable to consumers. Reducing sodium will alter the taste and may lead to consumers adding salt at the table. As mentioned above, the role of sodium in food safety and shelf-life must also be considered when attempting to achieve the target.

One industry group highlights the importance of providing adequate time for reformulation (more than four years) to allow for consideration of the reduction in seasonal foods and to implement labelling requirements. Multiple respondents also encouraged a phased approach so as to avoid compromising food safety and consumer acceptance.

Targeted consultation responses

The Department conducted targeted consultation on a revised target of 280mg/100g. Woolworths plus two manufacturers support the new target, noting alignment with NZ target as an improvement. One manufacturer advised that over 50% of their soup portfolio would need to be reformulated and they are unable to commit to meeting the target.

Summary of Recommendations for Food Category 33: Soups

It is important to consider the following recommendations are predominantly from participants that have responded unfavourably to the reformulation targets. They should be considered in the context of the data collected from all participants.

Table 34: (Soups) Consultation recommendations and RWG decisions

| Type of recommendation | Specific comments | RWG consideration |
|------------------------|--|---|
| Amend definition | Clarify inclusion/exclusion of powdered, reconstituted or ready to serve products. | RWG confirms that the target is per 100g/ml of product for ready to serve; and per 100g/ml of dry or condensed soups that have been made up / |

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| Type of recommendation | Specific comments | RWG consideration |
|------------------------|---|---|
| | | diluted in accordance with the on-pack instructions. |
| | Separate packet-dried soups into different category. | Once diluted / made up, sodium values are within the range of other ready to eat and condensed soup varieties. |
| | State target as mL/100g or mg/100mg as appropriate. | Target is for mg of sodium per 100g/ml of product, depending on how the product is labelled. |
| Amend target | 20% reduction for products significantly above target. | Noted, but decided to retain absolute target. |
| | Increase to 280mg/100g. | New Zealand target for soups is 280mg. RWG notes advice that over 50% of Australian market is currently manufactured in NZ, where this target has already been set. RWG sought further feedback on a revised sodium target of 280mg/100g/ml. |
| Amend approach | Companies nominate 95% of their portfolio for reformulation and reduce sodium as much as possible in remaining 5%. | RWG is proposing single end-point targets, and emphasises that industry has flexibility to implement as they see fit, which may include incremental changes. |
| Timeframe | Increase. | Retain 4yr implementation period |
| | Organisations to provide annual progress reports starting in 2019, in which potential challenges are identified to inform future requirements. If voluntary reformulation progress is not meaningful in terms of reduction in overall sodium in these items, government regulation should be enforced. If reductions are meaningful, then target should continue to be reduced progressively. | As consulted on, companies will be asked to report to the IMERG at 2yrs and after 4yrs. RWG acknowledge an interest in being able to report early successes of the Reformulation Program, but believe that companies who want to talk publicly about their progress will do so. |

3.3.34 Category 34: Sweet bakery – cakes, muffins and slices

Definition: Freshly baked, frozen, shelf-stable or baking mixes of cakes, muffins and slices.

ENDORSED TARGET: A reduction in sodium across defined products to 360mg/100g by 30 June 2024.

For dry mixes, the target applies to the product as prepared in accordance with the on-pack instructions, including the addition of icing if this is included in the package.

Inclusions

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.

Exclusions

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Meringues (including pavlova, macarons), muesli/fruit/nut bars, pastry bases (e.g. short crust pastry, tart shells), crepes, pancakes, pikelets, waffles, single cake-making ingredients (e.g. icing/frosting, sugar, flour), sweet buns (e.g. finger buns, fruit buns, fruit loaves, cinnamon scrolls), scones, pastries (e.g. croissants, Danishes, strudels), sweet biscuits, fruit pies, tarts, crumbles, doughnuts, profiteroles, flour-based puddings (e.g. sticky date pudding), eclairs and cookies.

Overview of responses

Four of 11 responses indicate the appropriateness of the definition. Other participants sought clarification of the definition, including the products that are included/excluded. One industry group believe it is necessary to explicitly state that the target is for products 'as prepared', and recommend that the category be divided into further sub-categories because the range of items in this category is too broad to fit under one target. This second point is supported by Woolworths. Both organisations highlight the substantial differences between the raising agent required for light and fluffy cakes compared to dense cakes and slices. The sub-categories should be based on the function and amount of leavening agent used. The World Action on Salt and Health public health group and the George Institute for Global Health indicate that they believe more sweet bakery products should be included in the definition. Although the items to be added are not specified, the organisations direct the Working Group to the UK 2017 sodium targets for guidance. Woolworths and another industry group express concern regarding salted caramel variants being included in this category, and suggest acknowledgement of these types of items (i.e. with characterising and typically salty ingredients), as per other categories. Finally, the AFGC seeks clarification regarding whether the icing/frosting component of cake mixes is included.

One industry group did not support the proposed target (technical constraints and challenges are discussed below) and suggest that they should be revised upwards based on discussion with industry. DAA support communication with food technologists and industry in order to ensure reformulation that does not compromise shelf-life and quality. In contrast, the George Institute for Global Health suggest that the proposed target is too conservative and should be reduced further to 270mg/100g. This is based on FoodSwitch data and comparison to the UK 2017 sodium target. A reduced target will be in line with the 3rd HSR cut-point.

As alluded to above, sodium plays a key role in raising agents and a specific functionality in the structure, texture, quality, shelf-life and flavour of products in this category. Therefore, reduction of sodium will negatively influence these outcomes. More specifically, there are certain ingredients containing sodium which cannot be reduced (e.g. naturally occurring sodium in certain products such as eggs, or raising agents which are required to make cakes rise), therefore to achieve the reformulation target the sodium would need to be drastically reduced in one or a small number of ingredients which will likely significantly impact the taste of the product. An industry group report having previously developed a sodium-free alternative and discovered poor consumer acceptance due to density and water activity. Woolworths state that they have removed all added salt from cake mixes but their products still exceed the sodium target because of the leavening agents. They query whether the reformulation target is seeking for companies to replace sodium bicarbonate with potassium bicarbonate and are concerned with the impact of this. In contrast, DAA state that they do not recognise sodium bicarbonate as a raising agent to contribute a significant amount of the sodium to the overall product. Gluten-free products are also likely to be more greatly influenced by reductions in sodium.

The communication on labels that a product is of a salty nature is also another consideration in reformulation. The label must not mislead the consumer with flavour names and visual cues if the

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sodium content is inconsistent with these messages. The cost and capacity of organisations to change their labelling as well as meet customer demand is another important concern.

Targeted consultation responses

The Department conducted targeted consultation on a revised target of 320mg/100g. One manufacturer recommended retaining the 360mg target proposed in the 2018 consultation. They note that Sodium in cakes is mostly for leavening agents used to achieve varying textures. One manufacturer commented that cake mixes may be more challenging to reformulate, and sodium is also contributed from the ingredients added to the cake mix (butter milk eggs) – these cannot be reformulated by the cake mix manufacturer.

It was also suggested that cakes be given a higher target than slices. Woolworths note that the 360mg target originally proposed would be very challenging. They also note that for uniced cakes at 740mg, where sodium is in mostly as a leavening agent, the target is not achievable.

Woolworths suggest splitting into cakes / muffins / slices categories with different targets for each. [Note that the secretariat has looked at this previously, and products are interspersed in the FoodTrack data; different targets may be set but are unlikely to be very different from each other].

Summary of Recommendations for Food Category 34: Sweet bakery – cakes, muffins and slices

It is important to consider the following recommendations are predominantly from participants that have responded unfavourably to the reformulation targets. They should be considered in the context of the data collected from all participants.

Table 35: (Sweet bakery – cakes, muffins and slices) Consultation recommendations and RWG decisions

| Type of recommendation | Specific recommendation | RWG considerations |
|------------------------|---|--|
| Amend definition. | Explicitly state that the target is for products 'as prepared'. | Agree, clarify as prepared according to on pack instructions |
| | Separate into sub-categories with different targets, based on amount of raising agent required. | Slices generally at lower end anyway, mean of products in scope is 428mg. Splitting slices would be a very small contributor, but there are higher sodium ones which fit within cakes range. RWG is further considering the additional feedback provided in March 2019. |
| | Include more sweet bakery items as per UK 2017 sodium target. | Other products are compositionally quite different, and contribute less than 1% to population intake of sodium according to ABS data. |
| | Exclude salted caramel varieties. | Noted, however some salted caramel products are within target range demonstrating technical feasibility. RWG notes that the number of these products has increased. |
| | Clarify inclusion/exclusion of icing/frosting component of cake mixes. | These are included. RWG has looked at the implications of icing/ fillings on the sodium levels of products and |

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| Type of recommendation | Specific recommendation | RWG considerations |
|------------------------|---|--|
| | | consider that these can have the same target applied. See data splits below. |
| Amend target | Reduce to 270mg/100g. | RWG has further explored options to split the category (see below), but determined that the products are most sensibly kept grouped together, and proposes a revised target of 320mg/100g. Based on both FoodTrack and FoodSwitch data (supplied in submission) roughly 1/3 of products will already meet this target. |
| | Increase. | |
| Amend approach | Companies nominate 95% of their portfolio for reformulation and reduce sodium as much as possible in remaining 5%. | RWG is proposing single end-point targets, and emphasises that industry has flexibility to implement as they see fit, which may include incremental changes. |
| Further consultation | Further targeted consultation with industry and food technologists to determine achievable target. | Industry comments are invited on the proposed amendment to definition and target, which have been considered in the context of all of the submissions received. Feedback about specific product types which may be unable to meet the target due to technological limitations is invited. RWG is further considering the additional feedback provided in March 2019 |
| Communicate | Communicate with industry that reformulation should not lead to increased saturated fat profile. | While the RWG will not prescribe how reformulation should take place, the aim of the reformulation program is to optimise the nutrient profile of foods. |
| Timeframe | Increase. | Retain 4yr implementation period |
| | Organisations to provide annual progress reports starting in 2019, in which potential challenges are identified to inform future requirements. If voluntary reformulation progress is not meaningful in terms of reduction in overall sodium in these items, government regulation should be enforced. If reductions are meaningful, then target should continue to be reduced progressively. | As consulted on, companies will be asked to report to the IMERG at 2yrs and after 4yrs. RWG acknowledge an interest in being able to report early successes of the Reformulation Program, but believe that companies who want to talk publicly about their progress will do so. |

3.3.35 Category 35: Flavoured milk - Mammalian milk

Definition: Mammalian milk with added flavour(s).

ENDORSED TARGET: A reduction in sugar across defined products to 9g/100g by 30 June 2025.

Inclusions

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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.

Exclusions

Plain milks (e.g. cow's milk, evaporated milk, buttermilk), dry beverage flavourings (e.g. NESQUICK), flavoured milk alternatives (e.g. chocolate soy milks), smoothies, meal replacements, protein shakes, frozen dairy desserts, cream (e.g. thickened cream, soy cream, sour cream), straws with integrated flavourings (e.g. Sippahh), breakfast beverages (e.g. Up&Go), formulated supplementary foods (e.g. Milo, Sustagen), probiotic drinks (e.g. kefir, Yakult) and bubble tea.

Overview of responses

Three of thirteen respondents indicated that the definition was appropriate for this food category. There were numerous suggestions for items to be included or excluded. A member of the public suggested that probiotic drinks such as Kefir and Yakult should be excluded, and an industry representative suggested the exclusion of ready-to-drink Milo and Sustagen. Suggestions for items to be included are smoothies, meal replacements, protein shakes, eggnog and breakfast beverages.

AFGC queried whether ready-to-drink Formulated Supplementary Foods are included in the definition and another industry representative believes the terms 'ready-to-drink' requires greater clarification, and queries why ready-to-drink items are included but dry beverage flavourings are not. An industry member believes that this food category should not be included in reformulation because of its role in the provision of dairy to many Australians. Another industry representative states that they would like to see greater transparency and rationale around the determination of inclusion and exclusion criteria.

Industry identified that there are significant challenges to reformulating beverages in this food category. Sugar is an important ingredient influencing taste, texture and viscosity and reformulation is therefore complex and could influence cost and consumer acceptance. Industry assert that consumers prefer the taste of sugar in comparison to other sweeteners. There is also concern that if consumers do not find alternatives acceptable then they will not consume these beverages which are important contributors to overall dairy consumption for many Australians. The majority of Australians already do not meet recommended consumption of dairy products which are the main providers of calcium in most peoples' diets. This raises public health concerns. It is important to consider naturally occurring lactose in this category and industry query whether the definition should include a distinction between this and 'added sugar'.

Food safety is another concern, with industry highlighting that sugar influences the reduction of harmful microbial growth. Sugar also plays a role in stabilisation, with reduction having the potential to lead to separation of ingredients in the flavoured milk. Stabilisation with sugar also allows milk to be able to be frozen and thawed. Sugars also act as a bulking agent. Several respondents noted that there are a number of modulators available to replace sugar but that this would add cost.

An industry representative also encourages acknowledgement of the commitment of members of the Australian Beverages Council to the Sugar Reduction Pledge for all non-alcoholic beverages.

Industry suggest that small and medium size enterprises will not likely have the resources to reformulate, in particular the technical expertise. They recommend that the Government consider ways to assist by providing resources and training. They also highlight that some member companies do not have the ability to change the formulation of products available in the Australian market because of uniformity of recipes markets in which the company operates. Industry members have

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suggested that this food category be excluded from reformulation, or if included then there should be a longer period of time allowed to achieve the targets. Others also recommend that there be different targets for different items so that some reformulation could occur but without a large negative impact on companies that have several items from this category in their portfolio.

The George Institute for Public Health supports the reformulation target but suggests that in the future it could be reduced further so as to align with New Zealand's target of 7g/100g. Another public health group suggest the target be reduced further due to these items being consumed in large quantities.

Summary of Recommendations for Food Category 35: Flavoured milk - Mammalian milk

It is important to consider the following recommendations are predominantly from participants that have responded unfavourably to the reformulation targets. They should be considered in the context of the data collected from all participants. The summary table in Section 4 presents recommendations based on all feedback.

Table 36: (Flavoured milk - Mammalian milk food category) Consultation recommendations and RWG decisions

| Type of recommendation | Specific recommendation | RWG notes |
|-----------------------------|--|---|
| Amend definition | Include: smoothies, meal replacements, protein shakes, eggnog and breakfast beverages. | Breakfast beverages are different products to flavoured milk (and are not grouped together in the Australian Health Survey), and don't contribute significantly to sugar consumption. |
| | Exclude: Kefir, ready-to-drink Milo and Sustagen. | Excluded. |
| | Clarify: lactose vs added sugar. | The target applies to total sugar, and accounts for intrinsic lactose. |
| Amend target | Do not reformulate. | Data does not indicate lowering target. NZ target also includes a percentage reduction target for products significantly above. The RWG prefer to set single end-point targets. |
| | Reduce further. | |
| | Increase | |
| Amend approach | Allow companies to nominate certain products in their portfolio for reformulation, allowing others to remain as they are. | RWG is proposing single end-point targets, and emphasises that industry has flexibility to implement according to their own internal product development cycles – this may involve incremental changes. |
| Provide support to industry | Provide training/resources to smaller enterprises to assist in reformulation. | Companies will be provided with guidance documents. |
| Timeframe | Extend. | RWG is proposing single end-point targets, and emphasises that industry has flexibility to implement according to their own internal product development cycles – this may involve incremental changes. |
| | Reduce. | |
| | Progress reports should identify potential challenges to inform future requirements. If voluntary reformulation is not meaningful in terms of reduction in overall sodium, government regulation should be enforced. If meaningful, then target should continue to be reduced progressively. | |

3.3.36 Category 36: Flavoured milk – Dairy alternatives

Definition: Any dairy milk substitute with added flavour(s).

ENDORSED TARGET: A reduction in sugar across defined products to 5g/100g by 30 June 2025.

Inclusions

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

Exclusions

Plain milks (e.g. original/plain soy milk), dry beverage flavourings (e.g. NESQUICK), flavoured animal milks (e.g. cow's milk), smoothies, meal replacements, protein shakes, frozen dairy-alternative desserts, straws with integrated flavourings (e.g. Sippahh), formulated supplementary foods (e.g. Milo), breakfast beverages (e.g. Up&Go), probiotic drinks (e.g. kefir, Yakult) and bubble tea.

Overview of responses

NOTE: Responses as part of the consultation regarding this food category are similar to those described in the previous section, however they are presented again so this section remains stand-alone.

Five of thirteen respondents agreed with the definition for this food category. Respondents noted that probiotic drinks such as kefir and Yakult should be excluded, whereas other participants indicated that smoothies, meal replacements, protein shakes and breakfast beverages should be included. Clarification was also sought on whether products sold into food service are to be included, and a respondent indicated that greater consistency in the definition is required with transparency regarding the rationale. An industry representative noted that artificially sweetened flavoured dairy milk alternatives are included, but because natural intense sweeteners (eg Stevia) are increasingly being used in both flavoured dairy and dairy free milks, they asserted the need for the definition to cover these products as well. Additionally, this respondent suggested the addition of the descriptor 'original' alongside the example of plain soy milk, to provide further clarity. 'Original' is a common descriptor used across dairy free milks by various manufacturers. Some 'original' style plant based alternatives to plain milk may contain flavourings (other than sugars) to improve palatability, and our understanding is that these would not be captured by the targets, which is considered appropriate. The term 'ready-to-drink' also requires clarification in the definition, as it could cause confusion among consumers and industry players. An industry representative also encourages acknowledgement of the commitment of members of the Australian Beverages Council to the Sugar Reduction Pledge for all non-alcoholic beverages.

Concerns about reformulation included increased artificiality, reduced palatability and thus poor acceptance by consumers. The AFGC noted that due to the absence of lactose, plant-based alternatives are less sweet which makes it more difficult to reduce sugar in these items. Woolworths also point out that dairy alternatives tend to have less fat and rely on sugar for mouthfeel. They recommend further targeted consultation with industry to develop more appropriate targets. DAA acknowledges there are some challenges that manufacturers may encounter in order to reach reformulation targets, however fully support their implementation. An industry group asserts that the target for this food category is too low and that there is a competitive advantage to dairy flavoured milks given this target is lower. Global recipes are also difficult to influence. Industry also comment

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that these drinks, if consumed in moderation, can form part of a healthy diet, and that they should continue to encourage the population to engage in physical activity and moderate their intake of high energy foods and beverages. Significant costs will also be incurred due to label design, production, proofing and labour.

Despite the constraints and barriers identified by several respondents, the George Institute for Public Health assert that the target could be made lower at 3g/100g. Whilst industry groups recommend a higher target of 5g/100g.

The AFGC recommend that organisations be able to identify some items in their portfolio for reformulation in the proposed timeframe. Incremental changes and further consultation with industry were also highlighted as reasons for why a longer timeframe is needed.

Summary of Recommendations for Food Category 36: Flavoured milk – Dairy alternatives

It is important to consider the following recommendations are predominantly from participants that have responded unfavourably to the reformulation targets. They should be considered in the context of the data collected from all participants. The summary table in Section 4 presents recommendations based on all feedback.

Table 37: (Flavoured milk – Dairy alternatives food category) Consultation recommendations and RWG decisions

| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|--|--|
| Amend definition | Exclude: probiotic drinks such as kefir and Yakult. | Excluded – did not form part of the dataset used to determine targets |
| | Include: smoothies, meal replacements, protein shakes and breakfast beverages. | Excluded – did not form part of the dataset used to determine targets |
| | Clarification sought regarding the meaning of the term ‘ready-to-drink’. | ‘Ready-to-drink’ refers to products that are ready to drink off the shelf, not requiring reconstitution |
| | Add ‘original’ to the descriptor of plain soy milk. | Amended |
| Amend target | Increase. | RWG has reconsidered the data used to inform the targets and has increased the target to 5g/100ml. |
| | Reduce further. | The RWG does not consider a target below 5g to be feasible. |
| Amend approach | Incremental changes to the target. | RWG is proposing single end-point targets, and emphasises that industry has flexibility to implement according to their own internal product development cycles – this may involve incremental changes. |
| Further consultation | Consult with industry regarding technological constraints. | |
| Timeframe | Organisations to provide annual progress reports starting in 2019, in which potential challenges are identified to inform future requirements. If voluntary reformulation progress is not meaningful in terms of reduction in overall sodium in these items, government regulation should be | As consulted on, companies will be asked to report to the IMERG at 2yrs and after 4yrs. RWG acknowledge an interest in being able to report early successes of the Reformulation Program, but believe that companies who want to talk publicly about their progress will do so. |

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| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|--|-----------|
| | enforced. If reductions are meaningful, then target should continue to be reduced progressively. | |
| | Increase. | |

3.3.37 Category 37: Muesli Bars and Snack Bars

Definition: Baked or cold-formed snack bars, based on cereals and/or nuts and/or seeds and/or fruit, may contain chocolate or yoghurt chips/coating or other fillings and toppings.

ENDORSED TARGET: A reduction in sugar across defined products to 25g/100g, or at least a 15% reduction for products containing over 28.5g/100g by 30 June 2025.

Inclusions

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.

Exclusions

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*.

Overview of responses

Half of the respondents agreed with the definition for this food category. Woolworths suggest that nut bars (non-cereal based) should be included in the definition, and another industry representative encourage the inclusion of protein bars, lo-carb bars and fruit bars. Others requested greater clarification of inclusions and exclusions, especially with regard to what is classified as protein, nut and fruit bars. There is also a query as to whether the reformulation occurs to all sugar in the product or only added sugar.

Several respondents asserted their concern that removing sugar would lead to increased artificiality of muesli bars. Some organisations highlighted the functions of sugar, including taste, colour, bulk, preservation, structural integrity (preventing crumbling) and texture. By reducing sugar, it is likely that consumer acceptance and cost effectiveness will be negatively influenced. In order to avoid this, some respondents recommend organisations be assisted to research and develop new technologies to assist in the reformulation process. In addition, certain types of bars will be more difficult to reformulate due to characterising ingredients also containing sugar (e.g. chocolate and fruit). These items are at a greater risk that identity, quality and commercial viability are compromised. Respondents suggest that there be different targets according to the type of muesli bar, as sugar plays a more critical role in certain bars (including those that are more nutrient dense).

Some responses challenged the need for reformulation of these items for health reasons. They state that muesli bars have been identified as important contributors of whole grain and nuts to many Australians diets. Moreover, they are not an important contributor of sugar in most people's diets.

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The George Institute for Public Health and another respondent suggest that the target could be lower. The George Institute recommend a target of 18g/100g based on analysis of the FoodSwitch database.

Several respondents suggested that companies should be able to identify some items within their portfolio for reformulation within the timeframe, but be provided extra time to attempt reformulation of other items. Several organisations have already reduced sugar in these items, and they highlight that these items are portion-controlled and therefore do not pose as much risk for large sugar consumption as other items.

Multiple respondents suggest that the timeframe is not long enough due to the technical constraints identified, the assertion that changes should be made incrementally and that time is required for research and development of new technologies to allow successful reformulation to occur.

Targeted consultation

The RWG conducted an additional targeted consultation in June/July 2020 on a revised food category definition and sugar target.

8 Responses – public health: 3, Industry: 5

Response rate: 80%

2 respondents agreed with the target, 2 provided qualified support, 2 thought the target should be lower and 2 thought it should be higher.

Alternative targets suggested: 18g/100g (2 respondents), 10% reduction for products containing over 28.5g/100g

The Obesity Policy Coalition, Dietitians Australia and one major retailer support the revised and wider definition and list of inclusions for this category, noting that the amended target aligns with the New Zealand Heart Foundation reformulation target.

Another respondent does not agree with extending the definition to include fruit-based snacks with added sugar. This respondent seeks clarification on the definition of added sugar, as there is no clear definition in the food standards code. It is primarily an issue for fruit-based snacks as a small amount of added sugar classifies these items as “included”. Additionally, if a small amount of sugar or maltodextrin were used in an energy ball for functional reasons, that product would be included.

Dietitians Australia support the revised target, citing a recent audit of muesli bars, grain-based bars, and oat slices which highlights that products in this category can be and already are being formulated with a sugar content below the proposed target, mitigating concerns about technical issues previously suggested.

The George Institute and the Obesity Policy Coalition (OPC) do not support the proposed target. While the target is lower than originally proposed, they do not believe it is low enough. The OPC note this is a particular concern for this product category which is a common lunchbox item for Australian children.

Two major manufacturers are fully supportive of the revised target. One submission agreed in part with the redrafted sugar target – they agree with the absolute portions of the target i) A reduction in sugar across defined products to 25g/100g and ii) a percentage reduction for products over 28.5g/100g, but did not agree with the 15% reduction, preferring to keep the 10% as was originally proposed.

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Another company notes that in particular, oat based bars, being crystalline/low moisture, require a higher amount of sugar - other binding solutions such as fibre do not result in the same crunchy texture. One respondent suggested splitting the category into two subcategories with separate sugar targets, stating that muesli-type bars are technically and compositionally different to fruit-based bars.

Woolworths recommends that bars and balls that are based on dried fruit are excluded, noting that cereals, nuts and seeds inherently have a lower sugar content compared to dried fruit. Consequently products based on dried fruit will be higher in sugar than those based on cereals, nuts or seeds. It is therefore not appropriate to apply the same sugar target to both. Additionally, for bars that are predominantly dried fruit and sugar there are limited opportunities to reduce the sugar content without replacing it with ingredients like maltodextrin or sweeteners.

The RWG agreed to confirm the revised target. The RWG acknowledge the functional role sugars play have in these products, and have amended the exclusion criteria to exclude products where less than 10% of energy comes from added sugar. A definition for added sugar for the purposes of the PRP has been developed.

Summary of Recommendations for Food Category 37: Muesli Bars

It is important to consider the following recommendations are predominantly from participants that have responded unfavourably to the reformulation targets. They should be considered in the context of the data collected from all participants. The summary table in Section 4 presents recommendations based on all feedback.

Table 38: (Muesli Bars food category) Consultation recommendations and RWG decisions

| Type of recommendation | Specific recommendation | RWG notes |
|--------------------------|--|--|
| Amend definition | Include nut bars, protein bars, lo-carb bars and fruit bars. | Protein and low-carb bars are considered to be a different type of product and will not be included in the category. The RWG considered the inclusion of fruit and nut bars, and determined that nut-based and fruit-based bars with added sugar will be included, but 100% fruit bars will be excluded. |
| Amend target | Reduce further. | RWG is proposing an increase to the percentage reduction portion of the target, while retaining the absolute target following reconsideration of the data after widening the definition. This aligns with the New Zealand Heart Foundation's reformulation target. |
| | Do not reformulate. | |
| Amend approach | Allow organisations to nominate a proportion of their portfolio for reformulation in the proposed timeframe. | RWG is proposing single end-point targets, and emphasises that industry has flexibility to implement according to their own internal product development cycles – this may involve incremental changes. |
| Research and development | Allow time for research and development to facilitate successful reformulation. | |
| Timeframe | Organisations to provide annual progress reports starting in 2019, in which potential challenges are | As consulted on, companies will be asked to report to the IMERG at 2yrs and after 4yrs. |

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| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|--|---|
| | identified to inform future requirements. If voluntary reformulation progress is not meaningful in terms of reduction in overall sodium in these items, government regulation should be enforced. If reductions are meaningful, then target should continue to be reduced progressively. | RWG acknowledge an interest in being able to report early successes of the Reformulation Program, but believe that companies who want to talk publicly about their progress will do so. |

3.3.38 Category 38: Beverages - Carbonated soft drinks and energy drinks

Definition: Ready-to-drink, non-dairy, sweetened drinks marketed as soft drinks or energy drinks.

ENDORSED TARGET: A 10% reduction in sugar for defined products above 10g sugar/100mL by 30 June 2025.

Inclusions

Carbonated soft-drinks, energy drinks (Formulated Caffeinated Beverages). Products sold as ready-to-drink.

Exclusions

Sports drinks, drink powders or concentrates, sparkling juices, electrolyte drinks, kombucha (and similar products where the majority of the added sugar has been fermented) and artificially non-nutritive sweetened or low kJ (<80kJ/100ml) drinks, including sports drinks.

Overview of responses

Six of the twelve respondents agreed with the current definition for this food category. One respondent queried whether cordials or fruit drinks, bubble teas and canned coffee should be included given they are not represented elsewhere. The AFGC expressed that the definition is unclear and that it should align with the Food Standards Code classifications for beverages and brewed soft drinks. They specified that water based flavoured drinks including formulated caffeinated beverages (e.g. energy drinks), iced teas and brewed soft drinks (i.e. kombucha) should be included in this category, but that electrolyte drinks, drink powders or concentrates, sparkling juices and fruit juices (as defined by the food standards code) and diet or low kJ drinks, flavoured water/spring water/mineral water/carbonated water, flavoured mineralized and flavoured soda waters should be excluded. There is a need to clarify the items included in the definitions, especially with regard to sports/electrolyte drinks and using the term 'diet' instead of artificially sweetened drinks.

DAA also does not support the definition and query the how the terms 'soft drinks' and 'energy drinks' were chosen. Another industry member group also recommend this target be aligned with the FSANZ definitions, and specifically suggest the exclusion of alcohol replacements (such as de-alcoholised beer or wine); liquid drink flavouring (typically added to food or drinks like coffee or cocktails); cordials, concentrates and powders to be prepared; sports drinks under the current definition of electrolyte and isotonic drinks; sports drinks under any future definition provided by FSANZ following current reviews; diet/low kilojoule drinks (drinks with <80kJ/100ml); and fruit juices (including coconut water) or sparkling juices. An industry group would prefer sparkling fruit beverages be included in the soft drink category rather than the flavoured water, mineral water and soda water and iced tea category. A large industry member organisation also suggests acknowledgement of the work that several organisations have already completed as part of the 'Sugar Reduction Pledge', and suggest that the proposed target should be changed to align with this.

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A member of the public is concerned that a reduction in sugar will lead to increased use of artificial sweeteners. This is also the concern of some industry members, due to artificial replacements potentially negatively impacting consumer acceptance, and may also create technical challenges due to the degree of solubility of these additives. Taste, texture and mouthfeel of items will be impacted by sugar reduction. Global recipes are also a barrier to reformulation given that global companies use uniform recipes across the world and it is unlikely that the Australian companies can influence this. Changes to sugar content will also require label changes which will be a significant cost to companies. Industry suggest that potential technical constraints be considered in more detail through a collaborative approach involving industry, government and public health stakeholders.

Some Industry groups query the need for reduction across all items given the diet options available already to consumers. Some believe it would be more effective to encourage the population to consume the diet options already available. In contrast, the George Institute for Public Health believe the target could be set lower at 9g/100g based on analysis of Food Switch data and given significant reformulation in the UK (based on 20% reduction target).

There are a range of different responses regarding the timeframe of implementation across this category. Public health groups suggest the reduction could be achieved in one year, whilst several industry groups believe longer than four years is required for companies with larger portfolios. Incremental reduction is also suggested which requires an increased timeframe.

Target Consultation

The Department conducted an additional targeted consultation in June/July 2020 on a revised food category definition.

Definition

Only one respondent commented on the revised definition. Dietitians Australia (DA) noted that the Reformulation Working Group excluded sports drinks. DA proposed the carbonated soft drink exclusions be amended to "Sports drinks, drink powders or concentrates, sparkling juices, electrolyte drinks, kombucha (and similar products where the majority of the added sugar has been fermented) and artificially non-nutritive sweetened or low kilojoule (<80kJ/100ml) drinks, including sports drinks."

Summary of Recommendations for Food Category 38: Soft drinks

It is important to consider the following recommendations are predominantly from participants that have responded unfavourably to the reformulation targets. They should be considered in the context of the data collected from all participants. The summary table in Section 4 presents recommendations based on all feedback.

Table 39: (Soft drinks food category) Consultation recommendations and RWG decisions

| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|---|--|
| Amend definition | More clarity is required, align with Food Standards Code. | There is no definition for soft drinks (with the exception of brewed soft drinks at Standard 2.6.2) in the Food Standards Code. |
| | Include Sports Drinks | Sports Drinks were not included in the modelling for this target, Sugar content is typically 6-7%, and for products also which are considered electrolyte drinks, the Food Standards Code is prescriptive regarding sugar content. |

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| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|---|---|
| Amend approach | Do not reformulate. | Noted. |
| | Decrease target further. | The RWG explored an absolute target of 10.5g/100ml, but after further modelling and consideration of international data, have decided to confirm the target taken to consultation. |
| Education | Encourage population to consume already-available diet drinks. | Noted. |
| Consultation | Further consultation regarding how to reformulate successfully. | Companies are best placed to determine how to reformulate their own individual products. |
| Timeframe | Organisations to provide annual progress reports starting in 2019, in which potential challenges are identified to inform future requirements. If voluntary reformulation progress is not meaningful in terms of reduction in overall sodium in these items, government regulation should be enforced. If reductions are meaningful, then target should continue to be reduced progressively. | As consulted on, companies will be asked to report to the IMERG at 2yrs and after 4yrs. RWG acknowledge an interest in being able to report early successes of the Reformulation Program, but believe that companies who want to talk publicly about their progress will do so. Retain 4yr implementation period. |
| | Reduce. | |
| | Increase. | |
| | Implement changes to sugar profile incrementally. | RWG is proposing single end-point targets, and emphasises that industry has flexibility to implement according to their own internal product development cycles – this may involve incremental changes. |

The RWG considered Industry claims that global recipes are a barrier to reformulation and that global companies use uniform recipes across the world. The 2015 Fizzy Drinks Global Survey by Action on Sugar showed a large variation in sugar content of well-known soft drink brands, and indicates that reformulation of global brands is feasible. However, from further investigation into the ingredients of different soft-drink formulations, it appears that to reformulation to reduce sugar content significantly requires supplementation with non-nutritive sweeteners to maintain the flavour profile. The RWG agreed to confirm the target taken to consultation.

In response to the submissions, and re-consideration of the data used to determine the draft target and international formulations, the RWG proposed an amended category name for 'Soft drinks' to clearly identify the included products and confirmed the original target.

3.3.39 Category 39: Beverages – Fruit drinks

Definition: Ready-to-drink fruit drink (carbonated or still), containing less than 96% fruit juice, with added sugar.

ENDORSED TARGET: A reduction in sugar across defined products to 9.5g/100ml by 30 June 2025.

Inclusions

Fruit Drinks, as defined in Standard 2.6.2 of the Food Standards Code, with added sugar.

Exclusions

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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, smoothies.

In reviewing the feedback for the 'Soft drinks' category, the RWG reviewed FoodTrack product data to consider the inclusion of 'Fruit drinks' in the 'Soft drinks' category, and whether there is a notable variation in sugar content of these two product types.

| | count | min | max | mean | 33 rd percentile | 66 th percentile | Proposed sugar target (g/100ml) |
|--------------|-------|-----|------|--------|-----------------------------|-----------------------------|---------------------------------|
| Soft drinks | 140 | 6.4 | 16.7 | 10.099 | 10.4 | 11.3 | 10% reduction >10g |
| Fruit drinks | 87 | 5.5 | 14.7 | 10.699 | 9.2 | 10.7 | 9.5 |

After applying a similar process to what was originally used to set the draft targets, RWG disagree with the recommendation in the submissions that Fruit drinks should be included in the Soft drinks category. Instead, a new subcategory for 'Fruit drinks' with a sugar target of 9.5g/100ml is proposed. Based on the data available roughly one third of products will already meet each of these targets.

Targeted Consultation

The Department conducted targeted consultation in June/July 2020 on this new food category.

7 Responses – public health: 3, Industry: 4
 Response rate: 70%
 2 respondents agreed with the target, 2 thought the target should be lower and 3 thought it should be higher.
 Alternative targets suggested: 10g/100ml (include with Soft Drinks), 10g/100ml (keep separate category), 7.5-8.5g/100ml, 9g/100ml

Dietitians Australia noted this new sub-category aligns better with Food Standards Code definitions in Standard 2.6.2. For certainty, the definition should include carbonated and still fruit drinks. This ensures sweetened carbonated fruit drinks are expressly included in the sub-category. DA proposes that the fruit drinks definition should be amended to "Ready-to-drink fruit drink (carbonated or still), containing less than 96% fruit juice, with added sugar."

One respondent expressed concerns regarding the term 'added sugar' being used as a differentiator for which products are in scope.

The Obesity Policy Coalition think this category should be extended to include cordials. These drinks can be very high in added sugar and should be subject to the same targets. Cordials account for 4.9% of free sugar consumption and are often consumed by young children making this an important category for reformulation and influence.

One respondent supports the target, but also states that companies that are actively supporting the Australian Beverages Council Limited Sugar Reduction Pledge should not be asked to commit additionally to the Healthy Food Partnership Reformulation Program.

One major retailer is supportive of the target, while the George institute and the Obesity Policy Coalition strongly propose that this target is lowered.

Woolworths is concerned that reaching the proposed target for fruit drinks without reducing the juice content or adding artificial or intense sweeteners would be difficult whilst still delivering a great

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tasting product that consumers will accept. The fruit juice and sugar content of fruit drinks is important not only for the taste, but also for the texture and mouthfeel.

Woolworths also notes that some fruit drinks that meet the target contain stevia. Some research suggests the effect of stevia on “good” bacteria in the colon may be undesirable and there is still no strong evidence as to whether intense sweeteners are beneficial or not. Given tetra pack fruit drinks are commonly consumed by children it is important that the risks versus the benefits of using an ingredient such as stevia compared to an additional 0.5g or less of sugar per 100mL is considered.

The RWG agreed to confirm the target taken to consultation. The 9.5g/100g target was carefully considered, and the data does not support the inclusion of fruit drinks into the soft drinks category. A definition for added sugar for the purposes of the PRP has been developed

3.3.40 Category 40: Beverages - Flavoured water, flavoured mineral water, soda water and iced tea

Definition: Ready-to-drink, non-dairy beverages with caloric sweeteners, excluding soft drinks and energy drinks.

ENDORSED TARGET: A reduction in sugar across defined products to 5g/100mL by 30 June 2025.

Inclusions

Vitamin waters, coconut water, sparkling flavoured waters (e.g. flavoured mineral or soda water) and iced tea. Products sold as ready-to-drink.

Exclusions

Cordials, juices, fruit drinks, smoothies, tea, coffee, plain mineral/spring/soda water, drink powders or concentrates, soft drinks, energy drinks and kombucha and water-kefir (and similar products where the majority of sugar has been fermented) and diet or low kJ (<80kJ/100ml food) drinks.

Overview of responses

Three of twelve respondents agree with the current definition. As per the points made with regard to the Soft drinks category, some respondents query where cordials, fruit drinks, bubble teas and canned coffee should be represented (suggesting they should be included here). A member of the public suggest that probiotic drinks should be excluded, and Woolworths suggest that iced tea be excluded from this group and added to the soft drinks category. The AFGC recommends inclusions should be flavoured mineral waters/ carbonated waters/ spring waters/ mineralised / soda waters, including flavoured waters, whilst exclusions should be cordials, drink powders or concentrates, plain mineral/spring/soda water, tea, coffee, smoothies, soft drinks, energy drinks, iced teas, fruit drinks, formulated beverages and brewed soft drinks (kombucha), electrolyte drinks, drink powders or concentrates, sparkling juices and fruit juices (as defined by the food standards code), coconut water and diet or low kJ drinks. They also encourage aligning the definition with the Food Standards Code, as do a large industry member organisation. This large organisation also encourages acknowledgement of the industry’s Sugar Reduction Pledge, and consider aligning the target with the work that is already occurring in order to meet the pledge.

Technical issues identified in response to this category are similar to those described for soft drinks. Increased artificiality (concerns regarding impact on taste and public health which may result from the consumption of these artificial sweeteners), taste, mouthfeel, inability to impact global recipes, solubility issues, requirements to change labels and cost were all identified as challenges of

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reformulation in this category. Iced tea was raised as an item that will be particularly difficult to reformulate given the need for sweetness and mouthfeel. In addition, a large industry member group expressed concern about impact on hydration should these items become unacceptable to consumers, fearing they will not replace intake they would have achieved via these items with other beverages.

The George Institute for Public Health suggest a lower target of 3g/100mL is achievable given their analysis of FoodSwitch data.

Industry groups suggest the need for incremental implementation, and that companies be able to identify a proportion of their portfolio that will be reformulated within the proposed timeframe (allowing more time to reformulate other items). Several respondents identified the need for a longer timeframe to achieve reformulation. However, one respondent expressed that reformulation should be achievable in a shorter timeframe.

Summary of Recommendations for Food Category 40: Beverages - Flavoured water, flavoured mineral water, soda water and iced tea

It is important to consider the following recommendations are predominantly from participants that have responded unfavourably to the reformulation targets. They should be considered in the context of the data collected from all participants. The summary table in Section 4 presents recommendations based on all feedback.

Table 40: (Beverages - Flavoured water, flavoured mineral water, soda water and iced tea food category) Consultation recommendations and RWG decisions

| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|---|---|
| Amend definition | Align with Food Standards Code | There is no definition for these types of drinks in the Food Standards Code. |
| Amend approach | Do not reformulate. | RWG is proposing single end-point targets, and emphasises that industry has flexibility to implement according to their own internal product development cycles – this may involve incremental changes. |
| | Incremental reduction. | |
| | Companies identify proportion of portfolio for reformulation. | |
| Further consultation | To address technical concerns and achievability of target. | |
| Timeframe | Organisations to provide annual progress reports starting in 2019, in which potential challenges are identified to inform future requirements. If voluntary reformulation progress is not meaningful in terms of reduction in overall sodium in these items, government regulation should be enforced. If reductions are meaningful, then target should continue to be reduced progressively. | As consulted on, companies will be asked to report to the IMERG at 2yrs and after 4yrs. RWG acknowledge an interest in being able to report early successes of the Reformulation Program, but believe that companies who want to talk publicly about their progress will do so. Retain 4yr implementation period. |
| | Increase. | |
| | Reduce. | |

3.3.41 Category 41: Sweetened yoghurt

Definition: Sweetened dairy-based yoghurts, liquid or semi-solid.

ENDORSED TARGET: A reduction in sugar across defined products to 12.5g/100g by 30 June 2025.

Inclusions

Sweetened yoghurts made with dairy milk (with sugar, honey, juice concentrate, fruit or other kilojoule-containing sweetener) with or without non-nutritive sweetener, added cereals/grains, nuts, fibre, vitamins, minerals or confectionary. Includes yoghurt drinks, fermented milk (milk kefir). Includes yoghurts sold in pots, pouches and bottles).

Exclusions

Custards, dairy and dairy alternative desserts (including frozen products), 'Fruche', fromage frais, plain/Greek-style or other unsweetened yoghurts and non-nutritive sweetened yoghurts with no added sugar, honey, juice concentrate, fruit or other calorie-containing sweetener, and yoghurts made with milk alternatives (e.g. nuts, oat, coconut, rice, soy).

Overview of responses

Four of eleven respondents indicated they found this definition to be reasonable. Woolworths suggest that sub-categories be developed for different product types for more achievability. They also query the need for this blanket reformulation given the existence of diet options within this group. A public health group suggest the inclusion of custards, dairy and alternative desserts in this group, and DAA highlight the discrepancy between this subcategory and the flavoured milk section, as both have dairy-alternative products and should both have separate categories for dairy and non-dairy items. Therefore, DAA propose a separate category for non-dairy based sweetened yoghurt. Likewise, other respondents queried the definition and encouraged alignment with the definitions in the Food Standards Code. An industry group requests more clarity regarding consistency of definitions across categories (i.e. yoghurts and milk), and greater transparency regarding the development of these categories and their targets. They recommend separate targets for both mammalian and non-dairy flavoured yoghurt, and also query if intrinsic sugars (i.e. lactose) are included in the sugar total or added sugar only.

There were many concerns and challenges identified with regard to the achievability of reformulation in this food category. The replacement of sugar with artificial sweeteners was a common concern and how this could negatively impact taste and solubility. Sugar is known to attenuate the sour taste resulting from lactic fermentation. Respondents also query the healthfulness of artificial sweeteners. Likewise, health may be impacted if consumers reduce their intake of yoghurt as an important dairy food in the diets of many Australians. This could lead to a reduction in overall calcium intake. Furthermore, it was asserted that the sugar from yoghurt is not a large contributor to the total sugar consumed in most diets. Sugar also allows suitable freeze-thaw properties of sweetened yoghurts and acts as a bulking agent.

Respondents in support of reformulation also highlight the need to communicate to industry that sugar reductions should be achieved without increasing saturated fat content and be accompanied by energy reduction. The George Institute for Public Health assert the need to reduce the sugar target further, based on analysis of FoodSwitch data. They suggest that 9g/100g is achievable.

Industry groups recommend incremental reductions and for companies to nominate a proportion of their portfolio for reduction in the proposed timeframe.

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The RWG considered the suggestion of a separate category for non-dairy yoghurts, and determined (through additional analysis of the category data) that separate targets are not indicated as dairy alternatives are typically lower in sugar. The RWG decided to remove non-dairy yoghurts from the category.

Comparing product spread: sugar content of non-dairy vs dairy yoghurts

| | Count | Min (g/100g) | Max (g/100g) | Mean (g/100g) | % above 10.5g/100g target | % above 13.5g/100g target |
|-----------------------|-------|-----------------|--|------------------|---------------------------------|---------------------------------|
| Non-dairy yoghurt | 16 | 1.2 | 10.1 (1 product, others are 6.5g or lower) | 3.4 | 0% | 0% |
| Dairy milk yoghurt | 289 | 5.8 | 19.3 | 12.0 | 66% | 33% |

In reconsidering the data to exclude non-dairy yoghurts, the RWG reflected on the target taken to consultation of 13.5g/100g, and agreed that this target was considerably higher than other categories. Adopting the same approach taken for other categories, where approximately 2/3 of the category sit above the target, the RWG agreed to take a reduced target of 10.5g/100g to targeted consultation.

Targeted consultation

The RWG conducted an additional targeted consultation in June/July 2020 on a revised food category definition and sugar target.

7 Responses – public health: 3, Industry: 4

Response rate: 78%

3 respondents agreed with the target, 1 thought the target should be lower, 3 thought it should be higher.

Alternative targets suggested: 9g/100g and 12.5g/100g (2 respondents)

Revised Definition

The majority of respondents agreed with the revised definition. One respondent agreed with the new definition, but queried the inclusion and exclusion criteria in relation to “yoghurt drinks” which are included, and “fermented milks” which are excluded. They recommend both “Yoghurts drinks” and “fermented milks” be excluded due to their lower sugar content compared to other dairy items in this category. The Obesity Policy Coalition would like to see the category extended to include custards, dairy and alternative desserts as these can be high in added sugar and are usually co-located with yoghurts in the supermarket.

In considering the above responses, and undertaking additional analysis, the RWG recommends including both drinking yoghurts and fermented milk drinks, they are similar compositionally to sweetened yoghurt.

Plant-based yogurts

Dietitians Australia agrees there is currently no strong need for sugar reformulation in non-dairy sweetened yoghurts. However, they recommend that this growing product category should continue

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to be monitored, and reformulation targets introduced if added sugar content begins to trend upwards.

The Obesity Coalition and two other respondents do not support the exclusion of milk alternative yoghurts from reformulation. An alternative category and target should be put in place for this category with a significantly lower reformulation target given these products contain no intrinsic dairy sugars. They state that plant-based sweetened yoghurts should be included as it is a growing category and industry data shows 34% of plant-based yoghurts would exceed an equivalent target of 5.5g/100g.

Revised Target

Three out of seven respondents agreed with the revised target. Of the four who disagreed with the target, one proposed it should be reduced further, while the other three thought it should be higher. The George Institute strongly propose that this target is lowered to 9g/100g (2 HSR baseline points) based on the high proportion of products already meeting this target, the FoodSwitch 33rd percentile and HSR cut-points.

Three respondents expressed concern that the revised total sugar target of 10.5g/100g may be achievable for a selection of yoghurts positioned for 'everyday' consumption, however it is not a realistic target that could be achieved for all yoghurts within the four-year time frame. Reasons cited include consumer acceptance, strategies used by lower sugar varieties (use of non-nutritive sweeteners or the lactase enzyme), and additional challenges for products with higher fruit content. Two of these respondents recommend an interim target of 12.5g/100g by end of 2024, progressing to a target of 10.5g/100g by 2030. One recommended two targets be set for sweetened yoghurt – a /100g target and a % reduction target.

The RWG considered the feedback on the revised target, and decided to confirm the target of 10.5g/100g. Almost 50% of respondents supported the revised target, and the RWG considers the four-year timeframe is sufficient.

Summary of Recommendations for Food Category 41: Sweetened yoghurt

It is important to consider the following recommendations are predominantly from participants that have responded unfavourably to the reformulation targets. They should be considered in the context of the data collected from all participants. The summary table in Section 4 presents recommendations based on all feedback.

Table 41: (Sweetened yoghurt) Consultation recommendations and RWG decisions

| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|---|---|
| Amend definition | Separate targets for mammalian and non-dairy flavoured yoghurt. | Separate targets are not indicated, as dairy alternatives are typically lower in sugar. After further consideration, the RWG agreed that Dairy alternatives should be removed from this category and not assigned a target at this time. However, they recommend that this category should continue to be monitored, and reformulation targets introduced if added sugar content begins to trend upwards. |

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| Type of recommendation | Specific recommendation | RWG notes |
|------------------------|---|--|
| | Clarify the inclusion/exclusion of “yoghurt drinks” and “fermented milks” | After additional analysis, the RWG recommends including both products, as compositionally, they are similar to sweetened yoghurt. |
| | Separate into gourmet options and plain yoghurts. | Not practical to define. |
| | Align with Food Standards Code. | The definition used in the Food Standards Code: ‘ <i>yoghurt</i> ’ means a fermented milk where the fermentation has been carried out with lactic acid producing microorganisms’ is not fit for this purpose, as it does not specify the use of added sugars. |
| | Extend the definition to include custards and dairy and alternative desserts | The RWG is not considering a target for these products as they were not identified in the initial identification of priority categories. |
| Amend approach | Do not reformulate. | The RWG amended the target to 10.5g/100g |
| | Reduce target further to 9g/100g. | |
| | Incremental reductions. | RWG is proposing single end-point targets, and emphasises that industry has flexibility to implement according to their own internal product development cycles – this may involve incremental changes. |
| | Companies can nominate proportion of portfolio for reformulation in proposed timeframe. | |
| Timeframe | Organisations to provide annual progress reports starting in 2019, in which potential challenges are identified to inform future requirements. If voluntary reformulation progress is not meaningful in terms of reduction in overall sodium in these items, government regulation should be enforced. If reductions are meaningful, then target should continue to be reduced progressively. | As consulted on, companies will be asked to report to the IMERG at 2yrs and after 4yrs. RWG acknowledge an interest in being able to report early successes of the Reformulation Program, but believe that companies who want to talk publicly about their progress will do so. |
| | Increase. | Retain 4yr implementation timeframe |
| | Reduce. | |

4. SUMMARY AND CONCLUSIONS

The RWG reiterates and recommends:

- The targets have been set at a retail level, using 2016/2017 FoodTrack data. Different datasets and data-collection methods will produce slightly different information.
- 2017 product nutrition information should therefore be considered as an appropriate baseline for the percentage reduction targets.
- The George Institute for Global Health’s FoodSwitch database was used to sense check the recommended targets.

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- Ideally targets would be set using sales weighted retail data, however at the time the RWG commenced this work it was unavailable at an affordable price with a sufficient level of product detail matched to necessary nutrition information.
- Future monitoring of the impact of the reformulation targets based on both SKUs (product count) and sales weighted data should be considered. The FoodSwitch database linked to Nielsen HomeScan data, or FoodTrack data combined with supermarket scanner data which has recently been made available to the Australian Bureau of Statistics, could both be considered for this purpose. There may be other similar databases arising in the future.
- Targets have been expressed as for 100% of in scope products. To specify a different percentage may be seen by some stakeholders as providing permission for high-sodium products, or top-selling products not to take reformulation efforts. Under a voluntary reformulation program and with flexibility for industry to implement as best fits within product cycles is it not possible to specify which products should be prioritised. RWG envisage and have modelled the impact of the targets (see Rationale) based on a best case scenario of 100% uptake.
- RWG recommend each target have an implementation period of four years from commencement.
- Industry submissions have noted the cost to industry of food reformulation, including from product research and development, consumer sensory and acceptance testing, label changes and each over several rounds if reformulation is conducted by an incremental approach.
- Content for a reporting template has been provided, and RWG consider this would be most accessible as an Excel document, for ease of industry reporting and compilation of data.
- Reporting on progress at two years of implementation and after four years of implementation is recommended.
- The targets have been set for a population health initiative. Notwithstanding that, the risk assessments identified areas where monitoring of population intakes including for vulnerable populations is warranted; particularly regarding the use of potassium chloride as a replacement for sodium chloride; and for impact on iodine fortification programs.
- Ongoing monitoring of population level dietary intake and nutrition surveys are recommended, to inform ongoing management of the potential risks and to assess the inferred impact of the reformulation program and Healthy Food Partnership as a whole.