

Healthy Food Partnership Reformulation Program: Wave 3 Category Definitions Targets

Overview

The **Healthy Food Partnership** <<https://www.health.gov.au/our-work/healthy-food-partnership/about-the-healthy-food-partnership>> (Partnership) is a voluntary collaboration between the food industry, the public health sector and government. Its goal is to enhance population health by improving the food environment and influencing Australians' ability to make healthier food choices.

A key initiative of the Partnership is the **Partnership Reformulation Program** <<https://www.health.gov.au/our-work/healthy-food-partnership/partnership-reformulation-program>> (PRP) which aims to reduce Australians' consumption of sodium, saturated fat and sugar from processed foods.

To achieve this aim, voluntary reformulation targets for sodium, sugar and saturated fat for specific food categories have been established. The PRP is being implemented in "waves". "Wave 1" consists of targets for sodium (across 28 food categories) and saturated fat (across 5 food categories). "Wave 2" consists of targets for sodium (across 5 food categories) and sugar (across 9 food categories) and commenced in 2021.

The Partnership Executive Committee agreed to the development of Wave 3 reformulation targets for an additional three food categories - plant-based proteins, plant-based sweetened yoghurts, and complete salads.

Plant-based proteins and yoghurts were identified to complement the existing targets for animal-based products. Complete salads were originally included in the Ready Meal category (Wave 2). However, feedback from a previous consultation recommended a separate target for these products, due to differences in weight and ingredients (salads are typically significantly lighter).

In July 2023, a targeted consultation was conducted with 7 industry and public health representatives, with experience in food reformulation, to seek feedback on draft definitions for the Wave 3 food categories. Following this, the categories were further refined.

Category definitions and targets have been developed for 4 food categories, which will form Wave 3 of the Partnership Reformulation Program. These categories/sub categories are:

- Plant based meat alternatives
 - Plant-based meat alternatives - Crumbed and battered
 - Plant-based meat alternatives – Mince and burgers
 - Plant-based meat alternatives – Butcher-styled cuts and sausages
 - Plant-based meat alternatives - Processed deli-style meat alternatives
 - Plant-based meat alternatives – Meat-free bacon
- Flavoured tofu
- Plant-based yoghurts
- Packaged salads
 - Packaged salads – Vegetable-dominant
 - Packaged salads – Starch-dominant
 - Packaged salads - Seafood salads

Why your views matter

Stakeholder submissions to this consultation will be used by the Healthy Food Partnership Secretariat and Healthy Food Partnership Executive Committee to determine appropriate definitions and reformulation targets for Wave 3 of the Partnership Reformulation Program.

Your views are being sought on whether:

definitions including inclusion and exclusion criteria for each category are appropriate; and reformulation targets for each category are feasible.

Responding to the consultation:

Download and read the Consultation Paper "Healthy Food Partnership Reformulation Program: Wave 3 Category Definitions and Targets" (available under the 'Related' section at the bottom of this page).

Respond to the questions in the online survey - the questions in the survey match the questions in the Consultation Paper. A preview of the survey is available for download under the 'Related' section at the bottom of this page.

Please provide evidence or examples to support your comments where possible. Comments on technical issues should be based on scientific evidence and/or supported by research where appropriate. Where possible, please provide citations to published studies or other sources.

It is not necessary to provide a response to all questions.

All submissions are subject to the **Freedom of Information Act 1982** <<https://www.legislation.gov.au/Details/C2018C00016>> in Australia. If you consider that all or part of your submission should not be released, please make this clear when making your submission and indicate the grounds for withholding the information.

Introductory text

Please note the questions numbers in this survey do not match the question numbers in the Consultation paper - Healthy Food Partnership Reformulation Program - Wave 3 Public Consultation due to additional introductory questions in the online survey regarding the respondent and privacy etc.

Introduction

1 What is your name?

Name

2 Are you answering on behalf of an organisation?

(Required)

Please select only one item

- Yes
- No

Organisation

If you would like to provide information about your organisation, you can do so below.

3 What sector do you represent?

(Required)

Please select only one item

- Food Industry
- Public Health
- Research/Academic
- Individual (Member of the public)
- Government
- Other

4 If we require further information regarding your submission, can we contact you?

(Required)

Please select only one item

- Yes
- No

5 Have you read the Consultation Paper - Healthy Food Partnership Reformulation Program: Wave 3 Category Definitions and Targets?

(Required)

Please select only one item

- Yes
- No

Privacy, Confidential Information and Permissions

IMPORTANT INFORMATION

Privacy and your personal information

The Healthy Food Partnership Secretariat at the Department of Health and Aged Care (Department) invites you to share your views on the public consultation Wave 3 Category Definitions and Targets for the Healthy Food Partnership Reformulation Program.

Your personal information is protected by law, including the *Privacy Act 1988* (Privacy Act) and the Australian Privacy Principles, and is being collected by the Department, via Citizen Space, for the purposes of conducting a consultation process in relation to the public consultation on improving commercial foods for infants and young children. The Department will collect your personal information at the time that you provide a submission, unless you choose to make a submission anonymously, and you are not reasonably identifiable from the information provided in your submission.

If you consent, the Department may, at its discretion, publish part or all of your submission on the Department's website. If your submission is published, the Department may identify you and/or your organisation as the author of the submission, if you consent to being identified. Please note that your email address will not be published and responses may be moderated to remove content that is inappropriate/offensive, or contains sensitive information.

Submissions which have been published on the Department's website can be accessed by the general public, including people overseas. Ordinarily, where the Department discloses personal information to an overseas recipient, Australian Privacy Principle (APP) 8.1 requires the Department to take reasonable steps to ensure that the overseas recipients does not breach the APPs. However, if you consent to the publication of your submission, APP 8.1 will not apply to this disclosure and the Department will not be accountable under the Privacy Act for any subsequent use or disclosure of the submission by an overseas recipient, and you will not be able to seek redress under the Privacy Act.

You should not include information in your submission about another individual who is identified, or reasonably identifiable. If you need to include information about another individual in your submission, you will need to inform that individual of the contents of this notice, and obtain their consent to the Department collecting their personal information.

You can get more information about the way in which the Department will manage your personal information, including our privacy policy, at <https://www.health.gov.au/resources/publications/privacy-policy> <<https://www.health.gov.au/resources/publications/privacy-policy>>. You can obtain a copy of the Department's privacy policy by contacting the Department using the contact details set out below. The Department's privacy policy contains information about:

how you may access the personal information the Department holds about you and how you can seek correction of it; and

how you may complain about a breach of

the APPs; or

a registered APP code that binds the Department; and

how the Department will deal with such a complaint.

You can contact the Department by telephone on (02) 6289 1555 or freecall 1800 020 103 or by using the online enquiries form at www.health.gov.au.

I consent to the Department collecting the information requested in Citizen Space about me, including any sensitive information, for the purposes indicated above.

By making a submission, I acknowledge that:

I understand that the giving of my consent is entirely voluntary

I am over the age of 18 years

I understand the purpose of the collection, use, publication or disclosure of my submission

I understand that copyright in the content of my submission will vest in the Commonwealth of Australia

Where relevant, I have obtained the consent of any individuals whose personal information is included in my submission, to the Department collecting this information for the purposes outlined in this notice

I understand that, where I have provided consent to my submission being published, the Department has complete discretion as to whether my submission, in full or part, will be published.

6 Do you consent to your Submission being published on the Department of Health and Aged Care's Consultation Hub website, and being accessible to the public, including persons overseas?

(Required)

Please select only one item

- Yes - Publish response, including both my name and organisation's name
- Yes - Publish response, without my name, but including my organisation's name
- Yes - Publish response without my name or my organisation's name
- No - I do not consent to the submission made by me being published on the Department's website

Plant-based products

Feedback is being sought on the following definitions and reformulation targets for Wave 3 of the PRP.

Plant-based

Definition: Products composed either predominately or entirely with plant-derived ingredients.

Plant-based meat alternatives

Definition: A food product produced mainly or entirely with plant-derived proteins/ingredients that that replicate the textural, flavour, appearance or other characteristics typically associated with animal meat-based products.

Plant-based meat alternatives subcategories: 1. Crumbed and battered, 2. Mince and burgers, 3. Butcher-styled cuts and sausages, 4. Meat-free bacon, 5. Processed deli meat

7 Is the overarching definition for this category appropriate?

Please select only one item

- Yes
 No

Please explain your reasoning.

Plant-based meat alternatives - Crumbed or battered

Plant-based meat alternatives - Crumbed or battered

Definition: Plant-based alternatives designed to replicate animal-based products that have been coated with a crumb or batter.

TARGET: A reduction in sodium across defined products to 450mg/100g by June 2028.

Inclusions

Crumbed and/or battered plant-based meat alternatives, such as schnitzels, nuggets, tenders, bites, fillets, fishless fingers, prawn-less cutlets. Also includes crumbed or battered patties and rissoles. May be whole or in pieces, chilled or frozen, cooked or uncooked. Includes plain and flavoured varieties (e.g. Kiev-style crumbed products). Includes gluten-free varieties.

Exclusions

Products without crumbing or batter, such as patties and uncoated rissoles. Traditional plant-based foods (e.g. tofu, tempeh - tofu or tempeh may be included as an ingredient), beans, nuts, seeds, gluten, jackfruit, banana blossom, mushroom, feta). Veggie patty-style products if made from a combination of vegetables, nuts or seeds. Animal-based products (e.g. cheese, seafood, meat and poultry).

8 Is the definition appropriate? E.g. are there any other products that could be included or excluded from this definition?

Please input your response below.

9 Are there any products in this category that should be split out into their own product category?

Please input your response below.

10 Are you aware of any technical constraints with meeting the reformulation target, in this time frame, for this food category?

Please input your response below.

11 Do you have any other concerns or challenges associated with this reformulation target?

Please input your response below.

Plant-based meat alternatives – Mince and burgers

Plant-based meat alternatives – Mince and burgers

Definition: Plant-based alternatives to animal origin mince and burgers, without crumb, batter, or other coating.

TARGET: A reduction in sodium across defined products to 400mg/100g by June 2028.

Inclusions

Plant-based meat alternatives in formats such as mince, koftas, patties, meatballs, and other similar products without a crumb, batter or other coating. Includes products designed to be eaten chilled, heated or cooked. May be whole or in pieces, fresh or frozen, uncooked or cooked. Includes gluten-free varieties.

Exclusions

Plant-based meat alternatives in formats such as butcher-styled cuts, sausages, hotdogs/frankfurts/saveloys, and shredded meat alternatives, crumbed, coated or battered plant-based meat alternatives, traditional plant-based foods (e.g. tofu, tempeh (tofu or tempeh may be included as an ingredient)), beans, nuts, seeds, gluten, jackfruit, banana blossom, mushroom, felafel), foods requiring reconstitution with additional liquids or extra ingredients (e.g. textured vegetable protein or dry burger mixes), Veggie patty-style products if made from a combination of vegetables, nuts or seeds. Vegetarian pates. Canned products. Animal-based products (e.g. cheese, seafood, meat and poultry).

12 Is the definition appropriate? E.g. are there any other products that could be included or excluded from this definition?

Please input your response below.

13 Are there any products in this category that should be split out into their own product category?

Please input your response below.

14 Are you aware of any technical constraints with meeting the reformulation target, in this time frame, for this food category?

Please input your response below.

15 Do you have any other concerns or challenges associated with this reformulation target?

Please input your response below.

Plant-based meat alternatives – Butcher-styled cuts and sausages

Plant-based meat alternatives – Butcher-styled cuts and sausages

Definition: Plant-based alternatives to animal origin butcher-styled cuts and sausages without crumb, batter, or other coating.

TARGET: A reduction in sodium across defined products to 500mg/100g by June 2028.

Inclusions

Plant-based meat alternatives in formats such as butcher-styled cuts, sausages, hotdogs/frankfurts/saveloys, shredded meat alternatives, and other similar products without a crumb, batter or other coating. Includes products designed to be eaten chilled, heated or cooked. May be whole or in pieces, fresh or frozen, uncooked or cooked. Includes gluten-free varieties.

Exclusions

Plant-based meat alternatives in formats such as mince, koftas, patties, meatballs, and other similar products without a crumb or batter, crumbed, coated or battered plant-based meat substitutes and analogues, traditional plant-based foods (e.g. tofu, tempeh (tofu or tempeh may be included as an ingredient)), beans, nuts, seeds, gluten, jackfruit, banana blossom, mushroom, feta), foods requiring reconstitution with additional liquids or extra ingredients (e.g. textured vegetable protein chunks), Vegetarian pates. Canned products. Animal-based products (e.g. cheese, seafood, meat and poultry).

16 Is the definition appropriate? E.g. are there any other products that could be included or excluded from this definition?

Please input your response below.

17 Are there any products in this category that should be split out into their own product category?

Please input your response below.

18 Are you aware of any technical constraints with meeting the reformulation target, in this time frame, for this food category?

Please input your response below.

19 Do you have any other concerns or challenges associated with this reformulation target?

Please input your response below.

Plant-based meat alternatives - Processed deli-style meat alternatives

Plant-based meat alternatives - Processed deli-style meat alternatives

Definition: Plant-based alternatives to processed deli-style meats (excluding bacon-style products).

TARGET:

Sodium: A reduction in sodium across defined products to 800mg/100g by June 2028

Saturated Fat: A reduction in saturated fat across defined products to 4g/100g by June 2028.

Inclusions

Plant-based meat alternatives intended to replicate meat products that would usually be preserved by smoking, curing, salting or chemical preservatives. Includes plant-based formats of ham, bresaola, turkey, salami, prosciutto, chicken slices, pepperoni or other styles of meat, including marinated or seasoned products without crumbing or batter.

Exclusions

Plant-based bacon. Meat alternatives that fit under another category. Animal-based products (e.g. cheese, seafood, meat and poultry). Foods requiring reconstitution with additional liquids or extra ingredients (e.g. textured vegetable protein chunks).

20 Is the definition appropriate? E.g. are there any other products that could be included or excluded from this definition?

Please input your response below.

21 Are there any products in this category that should be split out into their own product category?

Please input your response below.

22 Are you aware of any technical constraints with meeting the reformulation target, in this time frame, for this food category?

Please input your response below.

23 Do you have any other concerns or challenges associated with this reformulation target?

Please input your response below.

Plant-based meat alternatives - Meat-free bacon

Plant-based meat alternatives - Meat-free bacon

Definition: Plant-based processed bacon-style meat alternatives.

TARGET: A reduction in sodium across defined products to 530mg/100g by June 2028.

Inclusions

Plant-based bacon-style products intended to replicate animal-origin bacon.

Exclusions

Plant-based processed deli-style meat alternatives. Meat alternatives that fit under another category. Animal-based products (e.g. cheese, seafood, meat and poultry).

24 Is the definition appropriate? E.g. are there any other products that could be included or excluded from this definition?

Please input your response below.

25 Are you aware of any technical constraints with meeting the reformulation target, in this time frame, for this food category?

Please input your response below.

26 Do you have any other concerns or challenges associated with this reformulation target?

Please input your response below.

Flavoured tofu and tempeh

Flavoured tofu and tempeh

Definition: Tofu and tempeh with added flavour, marinade or salted.

TARGET: A reduction in sodium across defined products to 450mg/100g by June 2028.

Inclusions

Tofu, tempeh, and bean curd which has been flavoured or marinated.

Exclusions

Unflavoured/plain tofu, tempeh, and bean curd. Plant-based meat alternatives that fit under another category. Animal-based products (e.g. cheese, seafood, meat and poultry).

27 Is the definition appropriate? E.g. are there any other products that could be included or excluded from this definition?

Please input your response below.

28 Are you aware of any technical constraints with meeting the reformulation target, in this time frame, for this food category?

Please input your response below.

29 Do you have any other concerns or challenges associated with this reformulation target?

Please input your response below.

30 Currently there are limited flavours of marinated tofu (most use Asian sauces and sweet chilli). Are you aware of other flavours in development or likely to enter the market for which the proposed target may not be appropriate?

Please input your response below.

Sweetened yoghurt - non-dairy

Sweetened yoghurt - non-dairy.

Definition: Yoghurt made from non-dairy ingredients with added sugar.

TARGET: A reduction in sugar across defined products to 6g/100g by June 2028.

Inclusions

Pot-set or non-pot-set yoghurts made with plant-based ingredients (e.g. coconut, soy, grains, rice, oats, nuts) and cultures (with added sugar, honey, juice concentrate or other kilojoule-containing sweetener), with or without non-nutritive sweetener, added cereals/grains, nuts, fibre, vitamins and minerals or confectionary. Includes products in all packaging formats and all sizes (e.g. tubs, pouches and tubes, individual or share packs). Includes plant-based kefir and drinking yoghurts.

Exclusions

Yoghurts with no added sugar, honey, juice concentrate, or other kilojoule-containing sweetener. Puddings (including rice pudding) and other non-dairy desserts (e.g. chia pots, custards, frozen yoghurts), ice-creams/ice desserts, products without cultures, products with animal origin ingredients.

31 Is the definition appropriate? E.g. are there any other products that could be included or excluded from this definition?

Please input your response below.

32 Are you aware of any technical constraints with meeting the reformulation target, in this time frame, for this food category?

Please input your response below.

33 Do you have any other concerns or challenges associated with this reformulation target?

Please input your response below.

Packaged salads

Packaged salads

Definition: Products consisting of vegetables either raw or cooked (or combination), intended to be consumed cold, with the addition of other ingredients and dressings.

Packaged Salads subcategories: 1. Packaged salads – Vegetable-dominant; 2. Packaged salads – Starch-dominant; 3. Packaged salads - Seafood salads

Packaged salads – Vegetable-dominant

Definition: Vegetable-based salads with dressings and/or additions/toppings that contain added sodium.

TARGET: A reduction in sodium across defined products to 300mg/100g by June 2028.

Inclusions

Examples include Caesar salad, Greek salad, Asian-style salad, and wedge salad. Additions include meat, legumes, croutons, cheese, eggs, nuts and grains or starchy vegetables (when less than 50% total product). May include fruit as an ingredient. Ready to eat or combine/mix at home. Single or multi serve.

Exclusions

Bagged salads without inclusions (e.g. bagged mixed salad leaves). Fruit salads.

Note that vegetable-dominant and starch dominant salads have the same sodium target. Feedback on the targets are sought to ensure the target is appropriate for the products in each category.

34 Is the definition appropriate? E.g. are there any other products that could be included or excluded from this definition?

Please input your response below.

35 Are you aware of any technical constraints with meeting the reformulation target, in this time frame, for this food category?

Please input your response below.

36 Do you have any other concerns or challenges associated with this reformulation target?

Please input your response below.

Food category: Packaged salads – Starch-dominant

Food category: Packaged salads – Starch-dominant

Definition: Salads containing more than 50% starch-based ingredients, with dressings and/or additions/toppings that contain added sodium.

TARGET: A reduction in sodium across defined products to 300mg/100g by June 2028

Inclusions

Examples include pasta salad, potato salad, and cous-cous salads. Shelf-stable rice/pasta salads with meat/poultry/ vegetables and/or sauce with more than 50% starch-based ingredients (e.g. quinoa and bean salads in shelf-stable container). May include fruit as an ingredient. Ready to eat or combine/mix at home. Single or multi serve.

Exclusions

Excludes canned products (e.g. canned four bean mix) and products that have seafood ingredients (e.g. tuna and pasta salad). Excludes vegetable dominant salads.

37 Is the definition appropriate? E.g. are there any other products that could be included or excluded from this definition?

Please input your response below.

38 Are you aware of any technical constraints with meeting the reformulation target, in this time frame, for this food category?

Please input your response below.

39 Do you have any other concerns or challenges associated with this reformulation target?

Please input your response below.

Food category: Packaged salads – Seafood salads

Food category: Packaged salads – Seafood salads

Definition: Seafood-based salads with dressings and/or additions/toppings that contain added sodium.

TARGET: A reduction in sodium across defined products to 350mg/100g by June 2028

Inclusions

Seafood based salads containing a minimum of 10% fish/seafood. Examples include tuna and pasta salad, tuna and rice salad, salmon poke bowl. Includes products that have vegetables and other additions. Ready to eat or combine/mix at home. Single or multi serve.

Exclusions

Excludes products with more than 50% starch-based ingredients. Excludes products that come with crackers (e.g. Tuna & Crackers Snack Pack).

40 Is the definition appropriate? E.g. are there any other products that could be included or excluded from this definition?

Please input your response below.

41 Are you aware of any technical constraints with meeting the reformulation target, in this time frame, for this food category?

Please input your response below.

42 Do you have any other concerns or challenges associated with this reformulation target?

Please input your response below.