

**HEALTHY FOOD PARTNERSHIP REFORMULATION PROGRAM:**

**WAVE 3 CATEGORY DEFINITIONS AND TARGETS**

**AFGC SUBMISSION**

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**QUESTIONS**

**1 What is your name?**

Anne-Marie Mackintosh

**2 Are you answering on behalf of an organisation?**

Yes

**Please select only one item**

Australian Food & Grocery Council

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

The Australian Food and Grocery Council (AFGC) is the leading national organisation representing Australia's food, beverage and grocery manufacturing sector.

With an annual turnover in the 2022-23 financial year of \$162 billion, Australia's food and grocery manufacturing sector makes a substantial contribution to the Australian economy and is vital to the nation's future prosperity. Each business in the sector has contributed towards an industry-wide \$4.2 billion capital investment in 2022-23.

Food, beverage and grocery manufacturing together forms Australia's largest manufacturing sector, representing over 32 per cent of total manufacturing turnover in Australia. The industry makes a large contribution to rural and regional Australia economies, with almost 40 per cent of its 281,000 employees being in rural and regional Australia.

It is essential to the economic and social development of Australia, and particularly rural and regional Australia, that the magnitude, significance and contribution of this industry is recognised and factored into the Government's economic, industrial and trade policies.

The industry has a clear view, outlined in Sustaining Australia: Food and Grocery Manufacturing 2030, of its role in the expansion of domestic manufacturing, jobs growth, higher exports and enhancing the sovereign capability of the entire sector.

This submission has been prepared by the AFGC and reflects the collective views of the membership

**3 What sectors do you represent?**

Food Industry

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

Yes

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

Yes

**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?**

Yes - Publish response, including both my name and organisation's name

## Plant-based products

### 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 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?

Yes.

In general, the AFGC and its members support the definitions as drafted for 'plant-based' and 'plant-based meat alternatives'.

Additionally, the AFGC provides the following general feedback on the Wave 3 targets:

In establishing these targets, the AFGC has two primary concerns:

1. It is important to acknowledge that plant-based foods are an emerging category. Therefore, the consumption of these foods and their contribution of nutrients (such as sodium) to the Australian population's intake—based on national nutrition surveys—is currently unknown.
2. Setting nutrient targets that are too strict could hinder industry participation in the Wave 3 program, as this category is still trying to establish a foothold in the marketplace.

For this reason, the AFGC recommends that the proposed categories and targets do not proceed in wave 3.

### Consideration of the current environment

The transition towards dietary patterns that are both healthy and environmentally sustainable represents one of the major challenges of our time. We must address climate change while also anticipating a global population growth of 20% by 2050<sup>1</sup>.

The world's population is projected to increase by 2 billion people over the next 30 years, rising from 7.7 billion currently to 9.7 billion in 2050<sup>2</sup>. Consequently, global agricultural production must increase by approximately 60-70% from current levels to satisfy the heightened food demand expected by 2050<sup>3</sup>. This means that we will need to produce more protein, and it must be done more sustainably and sourced from a diverse range of options to nourish the future population. Plant-based alternatives present a significant growth market opportunity, particularly for Australia<sup>4</sup>.

<sup>1</sup> Lawrence, A. S., Huang, H., Johnson, B. J., & Wycherley, T. P. (2023). Impact of a switch to plant-based foods that visually and functionally mimic animal-source meat and dairy milk for the Australian population—a dietary modelling study. *Nutrients*, 15(8), 1825. <https://doi.org/10.3390/nu1508182>

<sup>2</sup> [Growing at a slower pace, world population is expected to reach 9.7 billion in 2050 and could peak at nearly 11 billion around 2100 | United Nations](#)

<sup>3</sup> [Feeding the world in 2050 and beyond – Part 1: Productivity challenges - Agriculture](#)

<sup>4</sup> [FoodFrontier-2023-State-of-the-Industry-report.pdf](#)

## **Category facing headwinds.**

Economic difficulties for manufacturers and consumers have resulted in an anticipated contraction in some areas of the Australian plant-based meat industry in FY23, including retail sales, economic contribution, employment, domestic production and investment. According to a recent report by the Alternative Protein Council<sup>4</sup> while the number of plant-based meat alternatives in the market has grown by 8% since July 2021 to January 2024, there has been a reduction in the range of products now available in major grocery chains nationwide, with retailer range reduction (product deletions) seen in some stores.

A decline was observed in several other categories including ready meals (down from 17.8% to 9.2%), burgers (uncrumbed) (declining from 11.5% to 8.1%) and sausages (down from 15.5% to 13.2%). Taste and price are the two most significant barrier to repurchasing PB products. According to Food Frontier survey<sup>5</sup>, 46% find the poor taste of these products to be a barrier, while 37% cite high prices as a barrier. Beyond price, the taste and texture of many plant-based meat products are still falling short of consumer expectations and remain a barrier to repeat purchase. According to Mintel, 53% of all consumers agree that plant-based meats should taste indistinguishable from conventional meat<sup>4</sup>.

This declining trend is seen elsewhere such as the US<sup>6</sup>. Following the rapid expansion of the U.S. plant-based retail market from 2019 to 2021, sales moderated in 2022 and declined in 2023. Plant-based price increases coincided with elevated inflation and tight consumer budgets, and purchase dynamics indicated weakening consumer engagement in plant-based categories. There are additional signals that, for the market to see sustained growth, products will need to better deliver on the key consumer drivers of taste, price, and convenience, while offering clear propositions to entice consumers to make the switch.

## **Technical challenges**

New product development requires functional, sensory and stability testing and, depending on the scale of the change or complexity of the recipe, it can take three months to three years to develop a new product due to changed solubility of the protein, or gelling, thickening, foaming, of the ingredients.

Given the long lead times required to see these changes reach the end consumer, plant-based meat manufacturers must ensure they have ongoing new product development processes in place to allow for continuous incremental innovation, from new and better performing ingredients to optimised manufacturing processes.

A recent article<sup>7</sup> examining the challenges of reformulating with plant-based proteins identified the following issues when delivering a quality product, without using animal-based ingredients (that are traditionally relied upon by industry):

- nutritional challenges related to protein content, protein quality and protein digestibility
- product development challenges related to ingredient functionality such as change in texture, mouthfeel or consistency of the final product
- the functionality of plant-based ingredients that do not match that of animal-based ingredients
- the lack of knowledge on how to use plant-based ingredients
- the potential change in colour and appearance of the product
- the potentially longer ingredients list that's required to achieve a similar functionality to the animal-based products
- concerns around how to match the taste and flavour, avoid undesirable flavours and ensure there isn't a lack of flavours or aftertaste
- higher costs of raw materials and processing
- safety of the ingredients, especially regarding the anti-nutrients found in many plant-based materials and allergens such as soya and lupin
- lack of consumer awareness and the fact that even within the vegan market the requirements can be mixed, and
- a lack of understanding how the changes will impact on the brand acceptability

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<sup>5</sup> [The Food Frontier consumer survey 2024 - Food Frontier](#)

<sup>6</sup> <https://gfi.org/marketresearch/>

<sup>7</sup> [The challenges of reformulating with plant-based proteins from Campden BRI](#)

**A note on sodium**

Reducing sodium poses several technical challenges for manufacturers. They must create products that are microbiologically stable and safe while also satisfying consumer flavour expectations. To achieve sodium reduction, certain products can utilize salt replacement technologies, such as potassium chloride (KCl), along with combinations of herbs and spices that enhance the perception of saltiness. However, there is a limit to how much KCl can be used before it negatively impacts flavour.

Moreover, sodium plays a crucial role in taste, and consumers expect plant-based (PB) foods to have a flavour profile similar to that of meat-based products. For items like PB bacon and PB burgers, a higher sodium content is often necessary to meet these taste expectations.

**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, felaful). 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?**

Yes.

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

No.

The AFGC recommends:

1. a target of **500mg/100g** for this category, and
2. extension of the timeframe on the to June 2029, to allow for the additional development time to address two sodium-containing components of the product.

The AFGC conducted a desk top audit of two major retailers and determined the mean for sodium to be 465mg with a range of 357-682mg/100g. See table 1.

<u>Table 1</u>	<u>Mean sodium mg Per 100g</u>	<u>n</u>	<u>Range sodium mg per 100g</u>
Plant-based meat alternatives - Crumbed or battered	465	22	357-682

Note the sample size is small. Refer to appendix 1 for data.

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

Yes. The AFGC requests that the timeframe for crumbed or battered products be extended by an additional year, until June 2029.

The rationale for this extension lies in the technical complexity of reformulating crumbed or battered products. Crumbed and batter products are made up of two primary components – the textured vegetable protein (TVP) base and the outer coating system (crumb/batter).

Sodium is an ingredient in both components and integral in supporting texture and palatability. As a result, reducing sodium content in these products requires addressing two components (TVP and the coating system), rather than just one, as is the case with mince and burgers. Sodium reduction requires significant trial to ensure texture, taste and sensory performance are upheld, and this process will be required for both components. Consequently, a longer redevelopment period is necessary to achieve the target.

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

As noted earlier in the submission, the plant-based meats category is currently in decline. Consumers want products that match their taste and price expectations.

The AFGC strongly recommends that reformulation targets do not place plant-based products at a taste disadvantage to animal-based products.

**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/Frankfurt/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, feta/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?**

Yes

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

No.

The AFGC investigated the category being split into two sub-categories: “plain mince” and “burgers” (see below) based on the premise that burgers have additional ingredients added that may contribute to the total sodium compared with plain mince.

Burgers are consumed in a different way to plain mince. Burgers are usually consumed as cooked without additional ingredients (as they already have added ingredient prior to cooking) while plain mince is an ingredient in a recipe and can be cooked in numerous ways with numerous ingredients being added to make the final meal. It is therefore recommended that the sodium level for burgers be higher than that of plain mince.

However, based on a desk top audit of retailers, there is little difference in mean sodium per 100g of mince and burgers. See table 2.

<u>Table 2</u>	<u>Mean sodium mg Per 100g</u>	<u>n</u>	<u>Range sodium mg per 100g</u>
Mince	398	5	295-581 (1120mg)
Burgers	414	7	295-570

Importantly the sample size is small and there is an outlier in mince of 1120mg that skews the mean of sodium of mince, so this was removed. Refer to appendix 1 for data.

**The target of 400mg/100g seems reasonable.**

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

See Q13 response above regarding an increased sodium level for burgers compared with plain mince.

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

See response to Q13.

**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?**

No.

The AFGC recommends:

1. that a definition be provided for “butcher style cut”. Please clarify to help industry as to what type of foods this encompasses.
2. sub-categories for sausages.

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

The AFGC recommends:

1. splitting sausages in this category into two sub-categories as “Plain style plant-based sausages” and “Frankfurt and Saveloy” (as per wave 1&2 categories) as the latter sub-category has a higher sodium content compared to plainer style sausages.
2. “Butcher-styled cuts” be deleted from this category depending on further clarification of this descriptor.

Wave 1&2 acknowledged the difference in sodium content for “Frankfurt and Saveloy”. This is equally justified in plant-based alternatives. The two sub-categories would be:

1. “Plain style plant-based sausages – all sausages except Frankfurt/Frankfurters, hot dogs and saveloys.

**Target 500mg/100g**

2. “Frankfurt and Saveloy” that include Frankfurt/Frankfurters, hot dogs and saveloys recognising the higher flavour and equivalent meat-based target.

**Target 700mg/100g**

See table 3.

<u>Table 3</u>	<u>Mean sodium mg Per 100g</u>	<u>n</u>	<u>Range sodium mg per 100g</u>
Plain style plant-based sausages	429	5	274-569
Frankfurt and Saveloy”	722	3	631-829

Importantly the sample size is small and there is an outlier in Plain style plant-based sausages of 274mg that skews the mean of sodium of sausages. Refer to appendix 1 for data.

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

As noted earlier in the submission, the plant-based meats category is currently in decline. Consumers want products that match their taste and price expectations.

The AFGC **strongly** recommends that reformulation targets do not place plant-based products at a taste disadvantage to animal-based products.

Noting that Wave 1 set separate targets for sausages and Frankfurt and Saveloy products and at higher levels. of, AFGC recommends a similar approach to plant -based.

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

Yes, see response to Q17 and 18.

**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?**

No.

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

No.

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

Yes.

The AFGC investigated the category and based on a desk top audit of retailers, there are few products that exceed the saturated fat target, and more than half exceed the sodium target. See table 4.

<u>Table 4</u>	<u>Mean sodium mg Per 100g</u>	<u>Range sodium mg per 100g</u>	<u>Mean Sat fat g Per100g</u>	<u>Mean Sat fat g Per100g</u>	<u>n</u>
Processed deli-style meat alternatives	941	567-1400	3.0	0.7-13	12

Importantly the sample size is small and there is an outlier in sat fat of 13g that skews the mean of sat fa. Refer to appendix 1 for data.

The AFGC recommends:

1. no saturated fat target.
2. sodium target of 950mg/100g

The AFGC notes that there are two targets for this category.

- 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

The AFGC seeks clarification on the relevance and need for a saturated fat target as a desk top audit of this category could find only a few products that exceeded the draft target.



If a saturated fat target were to be developed, the AFGC requests an extended year for 5 years as 2 targets. A precedent has been set with breakfast cereals which has 2 nutrient targets (sugar and sodium) and was extended by 1 year to meet the targets.

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

Yes, it is challenging to reduce sodium and saturated fat simultaneously therefore an extension for 5 years is requested.

As noted earlier in the submission, the plant-based meats category is currently in decline. Consumers want products that match their taste and price expectations.

The AFGC strongly recommends that reformulation targets do not place plant-based products at a taste disadvantage to animal-based products.

<p><b>Plant-based meat alternatives - Meat-free bacon</b></p> <p>Definition: Plant-based processed bacon-style meat alternatives.</p> <p><b>TARGET:</b></p> <p>A reduction in sodium across defined products to 530mg/100g by June 2028.</p> <p><b>Inclusions</b></p> <p>Plant-based bacon-style products intended to replicate animal-origin bacon.</p> <p><b>Exclusions</b></p> <p>Plant-based processed deli-style meat alternatives. Meat alternatives that fit under another category. Animal-based products (e.g. cheese, seafood, meat and poultry).</p>
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**24 Is the definition appropriate? E.g. are there any other products that could be included or excluded from this definition?**

No.

The AFGC investigated the category and based on a desk top audit of retailers, there are few products in this category n = 3, and is not appropriate to set a target based on a small sample size. See Table 5

<u>Table 5</u>	<u>Mean sodium mg Per 100g</u>	<u>Range sodium mg per 100g</u>	<u>n</u>
Plant-based meat alternatives - Meat-free bacon	726	530-1100	3

Note the sample size is small. Refer to appendix 1 for data.

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

While the AFGC does not support a target for this category, if it were to proceed, the AFGC recommends a higher level of sodium is required to deliver on the taste expectations of consumers.

The AFGC recommends that the sodium target for Meat-free bacon be aligned to that of animal-based products wave 1 bacon i.e. 1005mg/100g.

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For reference, Coles offers a plant-based bacon with 1100mg of sodium per 100g. [Plant based Bacon](#)  
It seems this was not captured in data, as the highest sodium level noted was 924mg per 100g.

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

Sodium contributes to taste and consumers expect that PB foods taste like meat-based e.g. within PB bacon, PB sausages, and PB burgers categories, a higher level of sodium is required to deliver on the taste expectations of consumers.

**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?**

No comment.

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

No comment.

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

No comment.

**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?**

No comment.

**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?**

No.

The AFGC seeks consistency in the definition applied to plant-based with that of dairy-based sweetened yoghurts. The definition for "Sweetened yoghurt" (dairy) in wave 1& 2, and a modified definition for plant based sweetened yoghurts is below:

<i>Sweetened yoghurt (dairy) (wave 1&amp;2)</i>	<i>Sweetened yoghurt (plant-based) (wave 3) Proposed new definition</i>
<p><i>Food Category: Sweetened yoghurt Definition: Sweetened dairy-based yoghurts, liquid or semi-solid.</i></p> <p><i>TARGET: A reduction in sugar across defined products to 12.5g/100g by 30 June 2024. this target will be reviewed in 2025, with the view to revising the target to 10.5g by 2030.</i></p> <p><i>Inclusions Sweetened yoghurts made with dairy milk (with added sugar, honey, juice concentrate or other kilojoule-containing sweetener) with or without non-nutritive sweetener, added cereals/grains, nuts, fibre, vitamins and minerals or confectionary, yoghurt drinks, fermented milk (milk kefir). Includes yoghurts sold in pots, pouches and bottles.</i></p> <p><i>Exclusions Custards, dairy and dairy alternative desserts (including frozen products), fromage frais (e.g. Fruche), plain/Greek-style or other unsweetened or non-nutritive sweetened yoghurts with no added sugar, honey, juice concentrate, or other kilojoule-</i></p>	<p><i>Food Category: Sweetened yoghurt Definition: Sweetened <b>plant-based</b> yoghurts, liquid or semi-solid.</i></p> <p><i>TARGET: A reduction in sugar across defined products to 12.5g/100g by 30 June 2024. this target will be reviewed in 2025, with the view to revising the target to 10.5g by 2030.</i></p> <p><i>Inclusions Sweetened yoghurts made with <b>plant-based</b> 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, <b>plant-based</b> yoghurt drinks, <b>plant-based</b> fermented milk (milk kefir). Includes yoghurts sold in pots, pouches and bottles.</i></p> <p><i>Exclusions Dairy and <b>plant-based</b> custards, desserts (including frozen products), plain*/ or other unsweetened or non-nutritive sweetened <b>plant-based</b> yoghurts with no</i></p>

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<p><i>containing sweetener, yoghurts made with milk alternatives (e.g. nuts, oat, coconut, rice, soy)</i></p> <p>Source: <a href="#">Partnership Reformulation Program – Food category definitions</a></p>	<p><i>added sugar, honey, juice concentrate, or other kilojoule-containing sweetener.</i></p> <p><i>*Please note when describing plain PB yoghurts, it means styles such as plain Greek style PB yoghurts that are unflavoured</i></p>
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**32 Are you aware of any technical constraints with meeting the reformulation target, in this time frame, for this food category?**

No. The AFGC conducted a desktop audit, and the target seems reasonable set at 6g/100g. See table 6.

<u>Table 6</u>	<u>Mean sugar g Per 100g</u>	<u>Range sugar g per 100g</u>	<u>n</u>
Sweetened yoghurt - non-dairy	5.8	2.4-7.1	22

Note the sample size is small. Refer to appendix 1 for data.

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

No

<p><b>Packaged salads</b></p> <p>Definition: Products consisting of vegetables either raw or cooked (or combination), intended to be consumed cold, with the addition of other ingredients and dressings.</p> <p>Packaged Salads subcategories:</p> <p>1. Packaged salads – Vegetable-dominant; 2. Packaged salads – Starch-dominant; 3. Packaged salads - Seafood salads</p> <p><a href="#">Packaged salads – Vegetable-dominant</a></p> <p>Definition: Vegetable-based salads with dressings and/or additions/toppings that contain added sodium.</p> <p>TARGET: A reduction in sodium across defined products to 300mg/100g by June 2028.</p> <p>Inclusions</p> <p>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.</p> <p>Exclusions</p> <p>Bagged salads without inclusions (e.g. bagged mixed salad leaves). Fruit salads.</p> <p>Note that vegetable-dominant and starch dominant salads have the same sodium target. Feedback on the targets is sought to ensure the target is appropriate for the products in each category.</p>
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**34. Is the definition appropriate? E.g. are there any other products that could be included or excluded from this definition?**

No.

Given the recent results of the Australian Bureau of Statistics<sup>8</sup> that indicates Australians are not reaching the recommended serves of vegetables (and fruits), setting a target for salads is not recommended. Adults and children had similar rates of meeting both fruit and vegetable recommendations (4.2% and 4.3%)

However, if targets are to proceed, the AFGC recommends re-consideration of salad sub-categories as “Vegetable-dominant” and “Starch-dominant” have the same draft target of 300mg/100g, and it is the ingredients that are inherently high in sodium and dressings that are the critical factors not the vegetable or starch component.

A desk top audit of online retailers’ (Woolworth and Coles) packaged salads, indicates that salads that have a higher sodium level are predominantly “Caesar” and “buffalo-style” salads when compared with other salad types. The common ingredients in Caesar and buffalo-style salads are:

- Caesar dressing and blue cheese dressing which contain ingredients that are high in sodium for example parmesan cheese, cheese powder, bacon, salt.
- additional bacon and cheese as a salad ingredient.
- chicken (optional) that is often processed with a brine or marinade that contains sodium.

Caesar and buffalo-style salad bowls have a mean sodium of 485mg/100g versus other salads with a mean of 257mg/100g. These salads when sold in a plastic bag as a kit have a mean sodium of 380mg/100g versus other salads with a mean of 193mg/100g. See excel spreadsheet.

The AFGC therefore recommends a target only for Caesar and buffalo style salads of 400mg/100g. See table 7.

<u>Table 7</u>	<u>Mean sodium mg Per 100g</u>	<u>Mean sodium mg Per serve</u>	<u>n</u>	<u>Range sodium mg per 100g</u>
<b>bowls with salad dressing sachets</b>				
Caesar and buffalo	485	865	6	370-636mg
Other	257	513	8	135-331
<b>Salad kits in a plastic bag</b>				
Caesar	381	434	2	377 -384
other	193	226	6	127 - 300
<b>ready to eat salads (tubs)</b>	256	421	12	186-439

Note the sample size is small. Refer to appendix 1 for data.

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

Yes.

The inherent ingredients of these salads (Caesar and buffalo) are high in sodium. It is therefore challenging to reformulate these inherently high sodium ingredients to a level that is like other salad types thus justifying a sub-category to themselves.

<sup>8</sup> [National Health Survey, 2022 | Australian Bureau of Statistics](#)

It may therefore not be necessary to set a target for other salad types as they are typically lower.

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

Yes, Sodium is used in salad for numerous reasons:

- **Preservation:** Sodium acts as a preservative, helping to extend the shelf life of salads by inhibiting the growth of bacteria and mould.
- **Flavour Enhancement:** Salt enhances the flavour of the salad, making it more appealing to consumers. Salt can reduce perception of bitterness. This is particularly effective in salads built around bitter greens like arugula, endive, and radicchio, which can sometimes overwhelm other flavours. Adding a pinch of salt can mellow the bitterness, creating balance with other salad ingredients like acidic dressing, sweet fruit, or umami-rich cheese. Salt also enhances our perception of sweetness.
- **Added Ingredients:** Many packaged salads include processed ingredients like cheeses, cured meats, or dressings, which can significantly increase the overall sodium content.

**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 multiserve.

**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?**

No. Please see response to Q 34 & 35.

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

Please see response to Q 34 & 35.

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

Please see response to Q 36.

**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**

No.

Given the results of the Australian Bureau of Statistics<sup>8</sup> that indicates Australians are not reaching the recommended serves of vegetables (and fruits) , setting a target for salads is not recommended. Adults and children had similar rates of meeting both fruit and vegetable recommendations (4.2% and 4.3%)

However, if a target proceeds, the AFGC recommends that ambient tuna ready meals be excluded in the definition. Based on the wave 1 & 2 categories, the AFGC views ambient tuna ready meals be assessed under 'Ready Meals' (definition attached), and not under this proposed salad category.

Please note '...shelf-stable rice/pasta with meat/poultry/fish/vegetables and/sauce served as a meal (e.g. quinoa and bean salads in shelf-stable container) ...'

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*Food Category: 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.

**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 (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).

The AFGC therefore recommends.

- 1) ambient tuna ready meals be excluded from seafood salads.
- 2) ambient tuna ready meals be assessed under the ready meal category (wave 1 & 2) and
- 3) The sodium target for ready meal category be reassessed considering the information provided in response to Q41 for tuna ready meals. The AFGC notes that the proposed target for ready meals is 250mg/100g which is lower than that proposed target for seafoods salads.

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

Yes.

The AFGC recommends that ambient tuna ready meals be excluded in the definition; and that it be included under “ready meals” with a reassessment of the sodium target.

A shelf stable tuna ‘Ready Meal’ with 25% tuna can hit 250mg/100g sodium from tuna component alone, before accounting for any other ingredients. Therefore, setting a target requires caution to ensure the target does not inadvertently drive the tuna percentage down to reduce the sodium.

For ambient tuna ready meals there are numerous sources of sodium in these products:

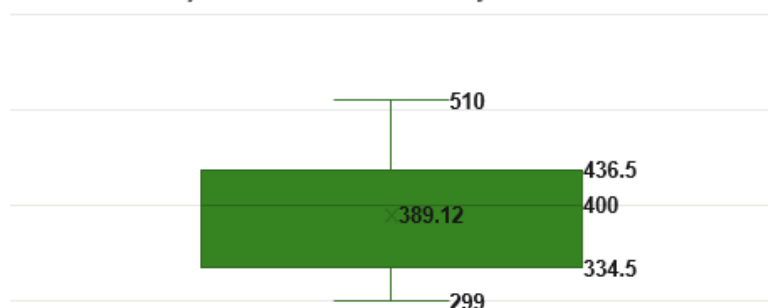
- sodium from tuna
- sodium from other ingredients (inherent and compound ingredients)
- added sodium as salt.

**Tuna procurement and challenges**

Fishing for tuna can take ~30 – 45 days at sea. Boats are not equipped with refrigeration or freezing capabilities. Once tuna is caught, it is preserved in salted ice baths for the remainder of the fishing trip duration. Whilst in the salt baths, tuna will absorb salt. The Thai Tuna Industry Association has set Quality Standards for ‘Salt content’ of tuna, with the maximum salt level set at 2.5% (Approx. 1,000mg sodium)

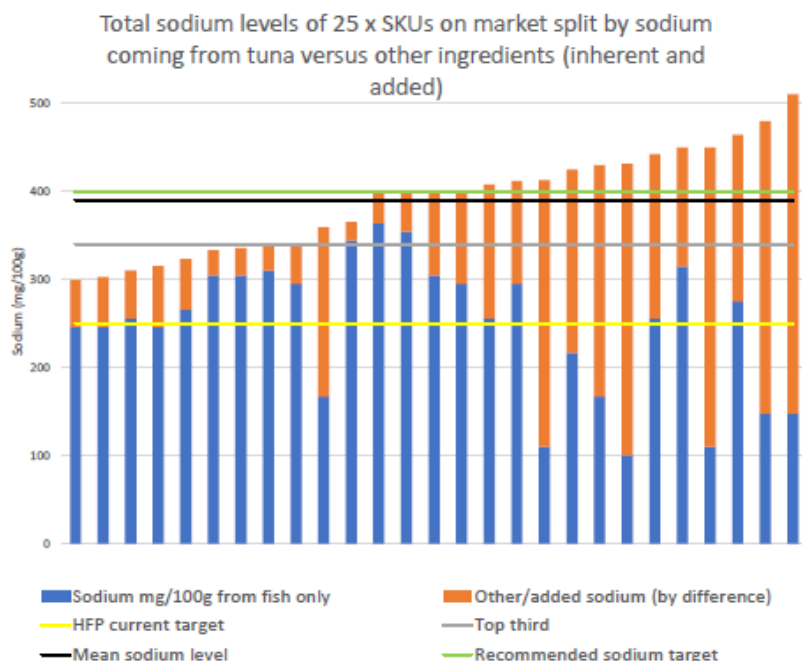
A desk top audit based on 2 major retailer websites indicates 25 shelf-stable tuna products across 6 brands were identified as meeting the inclusion criteria of HFP ‘Ready Meals’ food category, but none met the sodium target <250mg/100g.

**Sodium content (mg/100g) distribution of 25 Shelf stable tuna ready meals listed on two major retailer websites**





Given multiple sources of salt (sodium) in these products, sodium data alone does not provide adequate insight to set targets –



Please note that:

- No products meet current HFP target (yellow line)
- Top third' target approach (grey line) risks driving down tuna % due to flavour and cost challenges; resulting in lower levels of positive nutrients (protein, omega-3) and lower HSR.
- Mean target (black line) approach risks driving down tuna % for higher containing products to achieve flavour balance.

New sub-category and target for ready meal

The AFGC recommends that for the category of ready meals, a subcategory be created for tuna, with a revised target of 400mg/100g.

This drives a reduction in added salt (44% products above this level), while still enabling significant amounts of tuna in products.

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

Yes. See response to Q 40 & 41.

Category	Brand name	Product Name	Sodium mg mean	Sat fat g mean
<b>Plant based deli-style meat alts n=13</b>				
	Made with Plants	Meat free Ham Sliced	1200	1.7
	Made with Plants	Meat Free Roast Chicken	700	1.6
	Plantitude	Plant Based Salami	800	1.8
	Plantitude	Plant Based Smoked Ham Slices	1100	1
	Plantitude	Plant Based Pastrami Slices	800	1
	Get Plant'd	Deli-Style Ham	764	7.5
	Get Plant'd	Deli-Style Steak	567	0.6
	Get Plant'd	Deli-Style Pepperoni	807	13
	Suzy Spoon	Pastrami	873	2.8
	Suzy Spoon	Pepperoni Log	1020	0.7
	Deli Licious	Ham Style	1400	0.8
	Deli Licious	Hungarian Salami Style	1200	1.3
	Deli Licious	Chicken Style	1000	1.2
<b>mean</b>			<b>941</b>	<b>3.0</b>
<b>range</b>			<b>567-1400</b>	<b>0.7 - 13</b>
<b>Plant-based meat alternatives -Mince and burgers n=12</b>				
Mince n=5	Plantein	Premium Plant Based Mince 200g	460	
	Impossible	Plant Based Beef Mince 340g	325	
	Veef	Plant Based Beef Mince 300g	329	
	Birds Eye	Plant Based Mince 300g	581	
	V2	Plant Based Mince Beef 400g	295	
<b>mean</b>			<b>398</b>	
<b>range</b>			<b>295-460</b>	
Burgers n=7	Beyond Burger	Plant Based Burger Patties 226g	310	
	Vegie Delights	Plant Based Not Burger 300g	360	
	Meet	Plant Based Beef Burgers 2 Pack 200g	487	
	V2	Burger Beef 4pk 452g	295	
	Veef	Plant Based Premium Beef Burger 240g	550	
	Plantein	Premium 2 Plant Based Burgers 200g	570	
	Impossible	Plant Based Beef Burger 227g	325	
<b>mean</b>			<b>414</b>	
<b>range</b>			<b>295 - 570</b>	
<b>Plant-based meat alternatives – Butcher-styled cuts and sausages n=7</b>				
<b>Plain style sausages n=4</b>	Unreal Co.	Beefy Brat	517	
	V2	Spicy Spanish	274	
	vEEF	Smokey Sausages	569	
	vEEF	Chorizo Sausages	539	
	Suzy Spoon	Smoked Chilli Sausage	456	
<b>mean</b>			<b>429</b>	
<b>range</b>			<b>274-569</b>	

<b>Frankfurts and hot dogs n=3</b>	Suzy Spoon	Frankfurts	706	
	Frys	Smoked Hot Dogs	829	
	Vegie Delights	Vegie Hot Dog	631	
<b>mean</b>			<b>722</b>	
<b>range</b>			<b>631-829</b>	
<b>Plant-based meat alternatives - Meat-free bacon n=3</b>				
	Get Plant'd	Meat Free Bacon	530	
	Suzy Spoon	Smokey Rasher	547	
	Made with Plants	Meat Free Bacon	1100	
<b>mean</b>			<b>726</b>	
<b>range</b>			<b>530-1100</b>	

Category	Brand name	Product Name	Sugar g mean
<b>Sweetened yoghurt - non-dairy n=22</b>			
	Nakula	Coconut Strawberry Chia	3.8
	Nakula	Coconut Mango	5
	Nakula	Coconut Vanilla	4.8
	Vitasoy	Soy Lemon	6.8
	Cocobella	Coconut Strawberry	4.5
	Cocobella	Passionfruit Coconut	5
	Vitasoy	Soy Mango Passionfruit	6.9
	Cocobella	Protein Coconut Strawberry	6.8
	Cocobella	Protein Coconut Vanilla	5.9
	Coles	Coconut Vanilla	2.4
	Vitasoy	Soy Strawberry	6.5
	Vitasoy	Soy Vanilla	6.6
	Vitasoy	Oat Summer Fruit	6.6
	Vitasoy	Oat Blueberry	6.5
	CoYo	Coconut Mango	6.3
	CoYo	Coconut Strawberry	3.8
	Vitasoy	Oat Vanilla	7.1
	Kingland	Mixed Berries+chia	7.7
	Kingland	SoyPro+ Berries	7.1
	Cocobella	Blueberry Coconut	7.2
	Cocobella	Mango Coconut	5.6
	Cocobella	Vanilla Coconut	5.5
<b>mean</b>			<b>5.8</b>
<b>range</b>			<b>2.4-7.1</b>
<b>Packaged salads</b>			
<b>bowls with salad dressing sachets</b>	Woolworths	Chicken Caesar Salad Bowl	620

<b>Caesar and Buffalo salads n=6</b>	Woolworths	Chicken Buffalo Salad Bowl 180g	481
	Woolworths	Caesar Salad Kit Tub 250g	377
	Woolworths	Caesar Salad Bowl	370
	Coles	Kitchen Caesar Salad Bowl   200g	424
	Coles	Kitchen Chicken Caesar Salad Bowl   180g	636
<b>mean</b>			<b>485</b>
<b>range</b>			<b>370-636</b>
<b>bowls with salad dressing sachets</b>	Woolworths	Beetroot & Feta Salad Bowl 200g	331
<b>Other salads n=8</b>	Woolworths	Garden Salad Bowl 180g	329
	Woolworths	Green Goodness Salad Bowl	135
	Woolworths	Asian Salad Bowl	322
	Woolworths	Asian Salad Kit Tub 250g	300
	Woolworths	Cobb Salad Bowl 240g	248
	Woolworths	Mexican Style Salad Bowl Ready To Eat	184
	Coles	Va Green Goddess Better Bowl   200g	204
<b>mean</b>			<b>257</b>
<b>range</b>			<b>135-331</b>
<b>Kits</b>			
<b>Caesar and Buffalo salads n = 2</b>	Woolworths	Caesar Salad Kit Tub 250g	377
	Coles	Kitchen Caesar Salad Kit   290g	384
<b>mean</b>			<b>381</b>
<b>range</b>			<b>377-384</b>
<b>Kits</b>			
<b>Other salads</b>	Woolworths	Asian Salad Kit Tub 250g	300
	Woolworths	Korean Style Salad Kit 400g	251
	Woolworths	Kaleslaw Kit 350g	195
	Woolworths	Crunchy Noodle Coleslaw Kit Coleslaw Kit 520g	148
	Woolworths	Classic Coleslaw Kit 500g	138
	Woolworths	American Style Slaw Kit 450g	127
<b>mean</b>			<b>193</b>
<b>range</b>			<b>127-300</b>
<b>Ready to eat container</b>	Salad Servers	Pumpkin Couscous With Fresh Mint 600g	439
<b>Other salads</b>	Salad Servers	Green Goddess Salad 600g	306
	Salad Servers	Lentil Salad With Extra Virgin Olive Oil & Lemon 600g	248
	Salad Servers	Grains & Greens 250g	247
	Salad Servers	Quinoa Tabbouleh 250g	243
	Woolworths	Basil Pesto Pasta Salad 250g	240
	Salad Servers	Bean Medly With Lemon Zest 250g	238
	Salad Servers	Turmeric Couscous With Cauliflower & Cranberry 600g	226
	Salad Servers	Jewelled Saffron Rice 600g	217
	Coles Kitchen	Pasta Salad   250g	262
	Coles Kitchen	Coleslaw Salad   250g	222
	Coles Kitchen	Potato Salad   250g	186
<b>mean</b>			<b>256</b>
<b>range</b>			<b>217-439</b>

Plant-based meat alternatives - Crumbed or battered			sodium
	Birds Eye	Plant Based Veggie Patties	389
	Birds Eye	Plant Based Chicken Style Fingers   300g	431
	Birds Eye	Plant Based Wholemeal Crumb Chicken Tenders 300g	569
	Birds Eye	Plant Based Chicken Style Nuggets   300g	429
	Birds Eye	Plant Based Sweet Chilli Tenders   300g	415
	Coles	Natures Kitchen Chicken Style Sweet Chilli Tenders   300g	440
	Coles	Natures Kitchen Chicken Style Schnitzel   300g	390
	Coles	Natures Kitchen Chicken Style Nuggets   300g	370
	Fry's*	Plant Based Soy & Flaxseed Schnitzels 320g	570
	Fry's	Plant Based Rice Protein & Chia Seed Nuggets 240g	409.7 (410)
	Fry's	Plant Based Rice Protein & Quinoa Burgers 320g	681.7 (682)
	Fry's	Plant Based Rice Protein & Chia Seed Nuggets 240g	357
	Fry's	Plant Based Popcorn Chicken   300g	640
	Fry's	Gluten Free Nuggets With Rice Protein & Chia   240g	357
	Plantitude	Chicken Free Crumbed Tenders 300g	430
	Plantitude	Chicken Free Crumbed Schnitzels 300g	430
	Plantitude	Chicken Free Sweet Chilli Tenders Mild 300g	449
	Quorn**	Vegan Nuggets 280g	386
	Quorn	Frozen Meat Free Cheese & Spinach Schnitzels   240g	488
	Vegie Delights	Plant Based Chicken-Style Burgers 4 Pack	600
	Vegie Delights	Plant Based Not Burger 4 Pack	360
	Vegie Delights	Tender Crumbed Schnitzel 300g	630
<b>mean</b>			<b>465</b>
<b>range</b>			<b>357 - 682</b>

\*Fry's is made in South Africa

\*\*Quorn made in UK