



Údarás Sábháilteachta Bia na hÉireann
Food Safety Authority of Ireland

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Food Reformulation Task Force: Energy and target nutrient thresholds for use in new product development



Energy and target nutrient thresholds for use in new product development

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Glossary

Term	Text
FSAI	Food Safety Authority of Ireland
g	gram
Kcal	kilocalories
n	number of samples
NPD	new product development
ml	millilitres
NT	not targeted

1. Introduction

1.1 Purpose

This report outlines energy (calories) and target nutrient thresholds for use in new product development (NPD) in 13 food categories prioritised for reformulation in Ireland. An energy and target nutrient threshold for a food category or subcategory is intended to be a maximum limit for the energy (calories) or nutrient in a new product that is being developed in that category or subcategory of foods. Food businesses should aim to not exceed this threshold and, if at all possible, aim for a lower level of energy (calories) or nutrient in a new food product. The energy (calories) and target nutrient thresholds have been developed to address industry feedback on the challenges of applying percentage nutrient reduction targets to new products. These thresholds have been developed using median values for food products on the Irish market in 2021, and where needed, adapted to account for consultation feedback.

1.2 Background

The Obesity Policy and Action Plan – A Healthy Weight for Ireland published in 2016, outlines 10 steps to be taken within a 10-year time frame to address overweight and obesity in Ireland (DoH, 2016). Step three of the plan relates to food reformulation and aims to “secure appropriate support from the commercial sector to play its part in obesity prevention and agree food industry reformulation targets and review progress”. To achieve this a Food Reformulation Subgroup of the Obesity Policy Implementation Oversight Group developed *A Roadmap for Food Product Reformulation in Ireland* which was published in 2021 (DoH, 2021).

To deliver the Roadmap, the Food Reformulation Task Force, a strategic partnership between Healthy Ireland and the Food Safety Authority of Ireland (FSAI), was established in 2022. The Food Reformulation Task Force is implementing the Roadmap and monitoring progress made in reducing energy (calories), saturated fat, sugar, and salt in priority food categories.

1.3 Energy and nutrient reformulation targets for priority food categories

When referred to in the context of *A Roadmap for Food Product Reformulation in Ireland*, food reformulation means improving the nutritional content of commonly consumed processed foods and drinks. This is achieved by reducing energy (calories) and target nutrients (saturated fat,

sugar, and salt) to improve the nutrient quality of the food supply. Specifically, the Roadmap sets targets for the reduction of energy (calories) and sugar by 20% and salt and saturated fat by 10% between 2015 and 2025, in pre-packaged foods consumed by the general population (see Figure 1).



Figure 1 Nutrient reduction targets for food products prioritised for reformulation in Ireland between 2015 and 2025

1.4 Priority food categories for food reformulation in Ireland

The Food Reformulation Task Force published *Priority Food Categories for Food Reformulation in Ireland* in mid-2022. The 40 priority food categories were identified as being in high priority need of reformulation given their significant contribution to dietary intakes of the target nutrients in the Irish population (aged 1–90 years). The report, *Food Reformulation Task Force: Priority Food Categories for Food Reformulation in Ireland V3*, is available [here](#) (FSAI, 2023).

1.5 New product development and reformulation

The task force has received feedback from the food industry of challenges in applying percentage reduction targets to NPD. In response to this feedback, food businesses were advised to contact the task force when creating new products and a nutrient threshold relevant to the product type would be provided. This approach has been burdensome to both the task force and the food industry. To address this, the task force accessed pre-existing market snapshot data and developed draft energy (calories) and target nutrient thresholds for new products in 15 priority food categories, that were published for consultation in July 2024. A summary of the consultation feedback is outlined in Appendix 1. Following this consultation, feedback has been considered, and the thresholds have been finalised for 13 priority food categories.

In the context of this report, NPD means the development and launch of a new product to the market. It does not include existing food product renovation or the introduction of new flavours of an existing food product.

The task force recognises that some food categories are broad, and so it may not be feasible for all food products in a category to achieve the energy (calories) or target nutrient thresholds in new food products. The food industry is requested to bring foods to the market that are as close to the thresholds as possible, whilst maintaining the food product characteristics and safety.

2. Methodology

2.1 Dataset used

The FSAI took part in a European Union Joint Action [Best-ReMaP](#) work package 5, sharing best practice in reformulation monitoring between 2020 and 2023. Under Best-ReMaP in 2021, prior to the establishment of the task force, market snapshots of five food categories were completed by the FSAI. Nutrition declaration and food label information were collected for the food categories from four of the leading grocery retailers, who accounted for at least 60% of market share. These data were provided to the Food Reformulation Task Force and in 2023, these data were recategorised using the Irish Universities Nutrition Alliance food categorisation structure that has been adopted by the task force. In total these data represented 15 of the 40 priority food categories for reformulation. Further detail on the data collection methodology and data analysis, is outlined in the Food Reformulation Task Force 2023 Progress Report and Food Reformulation Task Force Monitoring Reformulation Progress in Priority Food Categories 2024 Report (FSAI, 2023; FSAI, 2024).

2.2 New product energy and target nutrient threshold development

To develop energy (calories) and target nutrient thresholds for use in NPD, the median energy (calories) and target nutrient value was calculated for each of the 15 priority food categories, using data described in section 2.1. The median value was chosen as it is considered to be a feasible target given half of existing food products in the food category have already achieved the target. It is also considered sufficiently ambitious as half of existing food products in the category require reformulation to meet the target. Applying the median nutrient content as a category wide threshold for NPD will contribute to achieving food category reformulation targets described in *A Roadmap*

for *Food Product Reformulation in Ireland*. Based on consultation feedback, the median value for saturated fat in Beef and veal products, and Sandwich hams was revised. Similarly, the threshold for salt in Ready to eat breakfast cereals was revised to account for consultation feedback on feasibility. Final thresholds were not included for Other breakfast cereals, Other breads, and the Natural yoghurt subcategory. For the 13 priority food categories for which thresholds have been established, they were included for energy (calories) or nutrients that are prioritised for reformulation in that priority food category. Where the reformulation of energy (calories) or a nutrient was not prioritised for reformulation in that food category, it was marked as Not Targeted (NT).

3. Energy and target nutrient thresholds for use in new product development

The energy (calories) and target nutrient thresholds for NPD in 13 priority food categories are outlined in Tables 1–8. Food category and subcategory examples are outlined in Appendix 2. Additional information on food categories and their descriptions can be found in the following report *Food Reformulation Task Force: Priority food Categories for Food Reformulation in Ireland V3* published [here](#).

Table 1 Target nutrient threshold per 100 ml of new beverage products

Priority food category	Sugar (g)
Alternatives to milk & milk-based beverages	4.75*
Carbonated beverages	4.00
Fruit juices & smoothies	10.00
Squashes, cordials & fruit juice drinks	3.90

ml=millilitres. *Excluding naturally occurring lactose and evaporated milks.

Table 2 Target nutrient threshold per 100 g of new dessert products

Priority food category	Sugar (g)
Desserts	18.45

g= gram.

Table 3 Energy and target nutrient thresholds per 100 g of new bread products

Priority food category	Energy (kcal)	Sugar (g)*	Salt (g)
White sliced bread & rolls	257	3.70	1.10
Wholemeal & brown bread & rolls	235	2.60	1.06

kcal= kilocalories; g= gram; *proving may release sugar, products should aim to be as close as possible to the nutrient threshold.

Table 4 Energy and target nutrient thresholds per 100 g of new beef & veal and chicken, turkey & game products

Priority food category	Energy (kcal)	Saturated fat (g)	Salt (g)
Beef & veal	NT	3.00*	NT
Chicken, turkey & game	120	NT	1.10

kcal= kilocalories; g= gram; NT= not targeted as energy or nutrient is not prioritised for reformulation in food category; *may not be applicable to beef mince.

Table 5 Target nutrient thresholds per 100 g of new bacon & ham products

Priority food subcategory	Saturated fat (g)	Salt (g)
Sandwich hams	1.30	1.80
Rashers	5.10	2.70
Other bacon & ham	4.60	2.90

kcal= kilocalories; g= gram.

Table 6 Target nutrient thresholds per 100 g of new sausage products

Priority food subcategory	Saturated fat (g)	Salt (g)
Traditional Irish sausages	8.50	1.78
Other sausage products	11.00	3.70

kcal= kilocalories; g= gram.

Table 7 Energy and target nutrient thresholds per 100 g of new ready to eat breakfast cereal products

Priority food category	Energy (kcal)	Saturated fat (g)	Sugar (g)	Salt (g)
Ready to eat breakfast cereals	385	NT	17.00	0.70

kcal= kilocalories; g= gram; NT= not targeted as energy or nutrient is not prioritised for reformulation in food category.

Table 8 Energy and target nutrient thresholds per 100 g of new yoghurt products

Priority food subcategory	Energy (kcal)	Saturated fat (g)	Sugar (g)
Flavoured yoghurt	84	1.6	9.9*
Non-dairy yoghurt alternative	76	0.4	8.2

kcal= kilocalories; g= gram; *including naturally occurring lactose.

4. Application of energy and target nutrient thresholds for new product development and monitoring

The energy (calories) and target nutrient thresholds outlined in this report should be used to inform NPD. The task force recognises that some food categories are broad, and so it may not be feasible for all food products in a category to achieve the NPD threshold. The food industry is requested to bring foods to the market that are as close to the energy (calories) and target nutrient thresholds as possible, whilst maintaining the food product characteristics and safety. Whilst achieving reformulations, it is important to note that foods placed on the Irish market must be safe, as required by Article 14 of Regulation (EC) No 178/2002.

For food categories not included in this report, food businesses should continue to contact the task force for guidance on appropriate energy (calories) and target nutrient thresholds for use in NPD. As and when data is available, energy (calories) and target nutrient thresholds for use in NPD for some of the remaining 27 priority food categories will be published.

The task force will monitor conformance with these thresholds as part of ongoing monitoring efforts, and progress will be published in monitoring reports.

5. References

Department of Health (2016) A Healthy Weight for Ireland: Obesity Policy and Action Plan 2016 – 2025. Available at: <https://gov.ie/en/department-of-health/publications/a-healthy-weight-for-ireland-obesity-policy-and-action-plan-2016-2025/>

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Food Safety Authority of Ireland (2023) Food Reformulation Task Force: Priority Food Categories for Reformulation in Ireland Version 3. Available at: <https://www.fsai.ie/publications/food-reformulation-task-force-priority-food-catego>

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Food Safety Authority of Ireland (2025) Food Reformulation Task Force: Monitoring reformulation progress in priority food categories 2024. Available at: <https://www.fsai.ie/publications/food-reformulation-task-force-monitoring-reformula>

Appendix 1 Draft energy and target nutrient thresholds for use in new product development consultation feedback

The draft energy (calories) and target nutrient thresholds for use in new product development were issued for consultation between August and September 2024. The consultation feedback is summarised here.

Consultation questions and responses

1. Which of the following best describes your sector of employment?

The consultation received 15 responses in total. The majority of respondents were from the food industry (53.33%), followed by other (26.67%), government body (13.33%) and retailer (6.67%).

2. Do you agree with the introduction of energy and target nutrient thresholds for new product development?

The majority of respondents (53.33%) stated they agreed with the introduction of thresholds, whilst 13.33% did not agree. The remainder of respondents (33.33%) did not agree or disagree. Respondents outlined some key areas for consideration in regard to the introduction of energy and target nutrient thresholds for new product development, including:

- a. The targets apply only to products per 100 g and don't consider reformulation by portion size.
- b. The targets should align with those of Public Health England and should account for the natural nutrient composition of foods.

3. Do you agree with the draft target nutrient thresholds for new beverage products?

Of those who responded, 40.00% agreed with the draft target nutrient thresholds for new beverage products, 20.00% disagreed, and the remainder of respondents (40.00%) did not agree or disagree. A specific request was made that naturally occurring lactose in dairy foods be accounted for. The applicability of the thresholds to evaporated milk was queried.

The sugar threshold for carbonated beverages was queried and additional information on the dataset used to develop the targets was requested.

4. Do you agree with the draft target nutrient thresholds for new dessert products?

Of those who responded, 26.67% agreed with the draft target nutrient thresholds for new dessert products, 13.33% disagreed and the remainder of respondents (60.00%) did not agree or disagree. A suggestion was made to set nutrient thresholds at subcategory level for dessert products.

5. Do you agree with the draft energy and target nutrient thresholds for new bread products?

Of those who responded, 40.00% agreed with the draft target nutrient thresholds for new bread products, 6.67% disagreed and the remainder of respondents (53.33%) did not agree or disagree. The potential for starch to breakdown into sugar during proving was raised as a potential challenge to achieving the draft sugar threshold.

6. Do you agree with the draft energy and target nutrient thresholds for new beef & veal and chicken, turkey & game products?

Of those who responded, 40.00% agreed with the draft target nutrient thresholds for new beef & veal and chicken, turkey & game products, 6.67% disagreed and the remainder of respondents (53.33%) did not agree or disagree. The naturally occurring saturated fat content in these products was raised as a potential barrier to achieving the draft saturated fat threshold.

7. Do you agree with the draft target nutrient thresholds for new bacon & ham products?

Of those who responded, 40.00% agreed with the draft target nutrient thresholds for new bacon & ham products, 13.33% disagreed and the remainder of respondents (46.67%) did not agree or disagree. The naturally occurring saturated fat content in these products was raised as a potential barrier to achieving the draft saturated fat threshold. Concerns around food safety and salt reduction were also raised.

8. Do you agree with the draft target nutrient thresholds for new sausage products?

Of those who responded, 40.00% agreed with the draft target nutrient thresholds for new sausage products, 6.67% disagreed and the remainder of respondents (53.33%) did not

agree or disagree. A concern was raised with regards to the salt target, and a stepwise approach to reducing salt in sausages was suggested.

9. Do you agree with the draft energy and target nutrient thresholds for new breakfast cereal products?

Of those who responded, 26.67% agreed with the draft target nutrient thresholds for new breakfast cereal products, 26.67% disagreed and the remainder of respondents (46.67%) did not agree or disagree. Respondents outlined the proposed salt target for Ready to eat breakfast cereals is substantially lower than the target in the UK, and would be challenging to meet. It was stated that the targets for Other breakfast cereals did not provide scope for product innovation.

10. Do you agree with the draft energy and target nutrient thresholds for new yoghurt products?

Of those who responded, 33.33% agreed with the draft target nutrient thresholds for new yoghurt products, 33.33% disagreed and the remainder of respondents (33.33%) did not agree or disagree. A specific request was made that naturally occurring lactose in yoghurt be recognised, and for natural yoghurt to be excluded.

11. Do you have any additional comments on the draft energy and target nutrient thresholds for new product development?

Two thirds (66.66%) of respondents provided additional comments. A number of comments welcomed the approach and outlined the need for ambitious reformulation targets to improve the nutrient quality of the food supply. Other comments reiterated the concerns summarised above. A request was made for the Food Reformulation Task Force to engage with the food industry at an earlier stage when establishing reformulation targets and in advance of the public consultation. A concern was raised about the timeframe for achieving the targets, outlining that a 2025 deadline did not allow for sufficient time for targets to be absorbed into new product development plans.

The feedback summarised here has been taken into account in the changes made to the final energy (calories) and target nutrient thresholds for use in NPD published in this report.

Appendix 2 Examples of food products in priority food categories and subcategories

Table 9 Examples of food products in priority food categories and subcategories

Food Categories	Subcategories included in this report	Examples* of foods contained in categories
Bacon & ham	Sandwich ham, Rashers, Other bacon & ham	Sliced ham, Bacon rashers, streaky bacon Gammon steaks, ham
Beef & veal	None	Fillet steak, mince beef
Carbonated beverages	None	Cola, orange, other fizzy drinks
Chicken, turkey & game	None	Chicken breast, turkey leg, duck, chicken/turkey sausages
Desserts	None	Tiramisu, apple crumble, sponge pudding, trifle, jelly pots
Fruit juices & smoothies	None	Mixed fresh juice, fresh apple juice, fruit smoothies
Alternatives to milk & milk-based beverages	None	Flavoured milk-based drinks, plant-based drinks
RTEBC	None	Cornflakes, branflakes, wholegrain loops, crispies, frosted flakes, muesli, granola
Sausages	Traditional Irish sausages, Other sausages	Pork sausages, cocktail sausages Frankfurters, hot dogs, salami, peperami, pepperoni
Squashes, cordials & fruit juice drinks	None	Fruit drink prepared for consumption, fruit juice drink
White sliced bread & rolls	White breads and rolls	White sliced bread, white rolls, crusty white loaf, ciabatta
Wholemeal & brown bread & rolls	Wholemeal, wholegrain and brown bread	Brown rolls, multigrain bagels, granary bread
Yoghurts	Flavoured yoghurt, Non-dairy yoghurt alternative	Fruit yoghurt, Plant-based yoghurt alternative

RTEBC= Ready to eat breakfast cereals



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