



2023

# Food Reformulation Task Force: Priority Food Categories for Reformulation in Ireland

Version 3



**Food Reformulation Task Force: Priority Food Categories for  
Reformulation in Ireland V3**

**Based on an analysis completed by the Dietary Surveys team in  
University College Dublin.**

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## Version history and updates

Version name	Date of change	Description of change
V2	12/05/2023	Table 1 chocolate confectionery and non-chocolate confectionery ticked for reformulation as well as portion size reduction. This is because the food categories have demonstrated reformulation is possible.
V3	29/09/2023	Report updated throughout to reflect the inclusion of the analysis of the National Preschool Nutrition Survey (NPNS). The analysis has not resulted in a change to the 40 priority food categories.

## Introduction

### 1.1 Background

'The Obesity Policy and Action Plan – A Healthy Weight for Ireland' published in 2016, outlines ten steps to be taken within a 10-year time frame to prevent overweight and obesity in Ireland <sup>1</sup>. Step three of the plan relates to food reformulation. It 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** <sup>2</sup>.

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 2021. The Food Reformulation Task Force will implement the **Roadmap** and monitor progress made in reducing energy (calories), saturated fat, sugar and salt in processed packaged food.

### 1.2 Targets

When referred to in the context of the **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 ensure a healthier 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, see Figure 1.



**Figure 1 Reformulation targets for Ireland 2015 - 2025**

As well as the above, targets will be scoped for product ranges explicitly produced for babies and young children in 2023.

## 1.3 Food categories

The **Roadmap for Food Product Reformulation in Ireland** sets out requirements for identifying priority food categories for food reformulation in Ireland. These include the identification of foods which contribute most to energy (calories), saturated fat, sugar and salt intakes in the Irish diet. The roadmap also requires alignment with PHE<sup>a</sup> Salt and Sugar reformulation programme food categories as well as top shelf foods. Food categories considered by the EU Joint Action (JA) on Nutrition – Best-ReMaP<sup>b</sup> will also be included. Finally, product ranges aimed towards babies and young children are included in the reformulation programme.

## 2. Objective

In order to identify and select a list of priority food categories for reformulation in Ireland a review was undertaken to identify the food categories that:

- Contribute most to the intakes of calories, saturated fat, total sugar, and sodium in foods and drinks consumed by the Irish population based on the Irish University Nutrition Alliance (IUNA) dietary surveys (preschool children, primary school aged children, adolescents, adults, and older adults)
- Are targeted by the Public Health England (PHE) Sugar (2017) and Salt (2020) reformulation programmes
- Are top shelf foods in the food pyramid
- Are monitored in the European Union Joint Action (JA) Best-ReMaP Healthy Food for a Healthy Future project
- Are included in the World Health Organisation (WHO) Global Sodium Benchmarks
- Have potential for reformulation or suggested serving size reduction.

Based on this review a final list of priority food categories for reformulation in Ireland was developed and is outlined in this report.

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<sup>a</sup> Now referred to as the Office of Health Improvement and Disparities (OHID)

<sup>b</sup> breakfast cereals, soft drinks, bread products, delicatessen meats & similar, fresh dairy products & deserts.

## 3. Methods

The methodology followed is described in this section of the report and outlined in Figure 2.

### 3.1 Identification of food categories that contribute most to the intakes of calories, saturated fat, total sugar, and sodium in foods in the Irish population (1 - 90 years)

An analysis of the IUNA nationally representative dietary intake surveys was undertaken<sup>c</sup>. The top 20 food categories contributing to saturated fat, total sugar and sodium for each of the population groups aged 1 - 90 years was compiled. Additional lists were compiled with a focus on the top 20 contributing food categories for preschool children (1 – 4 years) and children and adolescents (5 - 18 years). These lists were cross checked against top contributors to energy (calories) (from both the total population calorie intake and children and adolescent calorie intakes) to ensure no food category had been missed.

### 3.2 Comparative analysis

A comparative analysis of food categories common to the following was completed:

- Food categories that contribute most to the intakes of calories, saturated fat, total sugar, and sodium in the Irish diet
- Top shelf foods in the food pyramid
- Food categories targeted under PHE Salt and Sugar reformulation programmes
- Food categories target under European Union Best-ReMaP Healthy Food for a Healthy Future project and WHO Global Sodium Benchmarks.

Where food categories from the above comparative analysis were not identified as contributors in the Irish diet, pragmatic decisions were made to include or exclude the food categories.

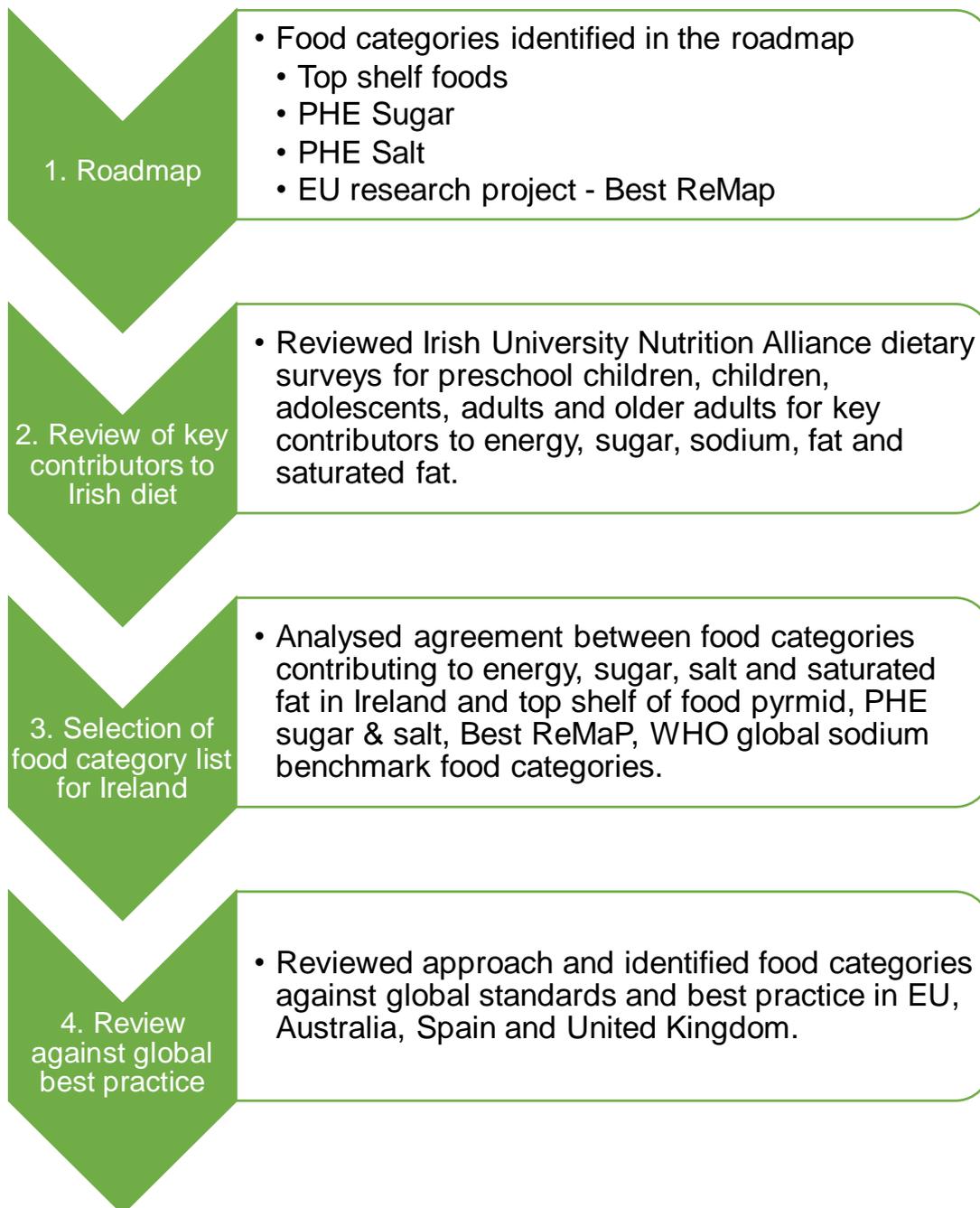
### 3.3 Recommendation on food categories for reformulation

The list of food categories for reformulation developed following comparative analysis (see 3.2) was reviewed. Recommendations were made to determine which of the food categories are most suitable for (a) reformulation and (b) suggested serving size reduction. Recommendations for each took

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<sup>c</sup> National Preschool Nutrition Survey – NPNS (2011 – 2012; n500; ages 1-4 years), National Children’s Food Survey II - NCFS II (2017-18; n600; ages 5-12 years), the National Teens’ Food Survey II - NTFS II (2019-20; n428; ages 13-18 years) and the National Adult Nutrition Survey - NANS (2008-09; n1500; ages 18-90years)

PHE's reformulation guidance into account <sup>3 4</sup>. This approach was reviewed and benchmarked against global best practice in reformulation across EU, Spain, United Kingdom and Australia.



**Figure 2** Method for identification of priority food categories for food reformulation in Ireland

## 4. Results

### 4.1 Identification of food categories that contribute most to the intakes of calories, saturated fat, total sugar, and sodium in foods in the Irish population

The 20 food categories contributing to the **intakes of total energy** (calories) in the Irish population (1-90 years) were food categories that consisted of

- starchy foods (rice, pasta, flours, grains and starches and potatoes)
- breads (white and wholemeal based breads and rolls)
- cereals (ready to eat breakfast cereals)
- savoury foods
- discretionary foods (biscuits & crackers, cakes, pastries & buns, chocolate confectionery, savoury snacks)
- soups, sauces & miscellaneous foods
- meats and fish (chicken, turkey & game, fish & fish products, meat products, beef & veal dishes)
- dairy based foods (spreads, cheeses and whole milk)
- alcoholic beverages.

The 20 food categories contributing to the **intakes of saturated fat** in the Irish population (1-90 years) were food categories that consisted of

- dairy-based foods (butter and spreads, cheeses, whole milk, and yoghurts)
- discretionary foods (ice cream, chocolate confectionery, cakes, pastries & buns, biscuits)
- savoury foods (savoury food products such as pizza, pancakes, sandwiches)
- meats (beef, veal, bacon & ham, sausages, meat products).

The 20 food categories contributing to the **intakes of total sugars** in the Irish population (1-90 years) were

- breads (wholemeal & brown bread & rolls, white sliced bread & rolls)
- cereals (ready to eat breakfast cereals and other breakfast cereals)
- discretionary foods (Ice-creams, desserts, chocolate & non chocolate confectionery, biscuits including crackers, cakes pastries & buns and alcoholic beverages)
- beverages (carbonated beverages, fruit juices & smoothies).

The 20 food categories contributing to the **intakes of sodium** in the Irish population (1-90 years) were

- breads (wholemeal & brown bread & rolls, white sliced bread & rolls and other breads)
- cereals (ready to eat breakfast cereals)
- savoury foods (savouries, savoury snacks)
- meats and fish (sausages, bacon & ham, poultry & game dishes, beef and veal dishes, fish & fish products)
- dairy products (low fat, skimmed & fortified milks, cheeses)
- other fat spreads.

A compiled list of food categories which are the main contributors **to intakes of saturated fat, total sugars, and sodium** across the Irish population was established from the top 20 food lists. When duplicates were removed this resulted in a list of 40 food categories. This list was compared to the top 20 food categories that contributed to energy (calories) intake. This comparison showed that two categories were not included in the list of 40 food categories: rice, pasta, flours, grains and starch and potatoes -boiled, baked or mashed. Neither of these food categories are considered suitable for food reformulation and so they were not included in the priority food categories for food reformulation list.

The list of 40 food categories was compared with the food categories contributing to intakes of saturated fat, total sugar and salt in preschool children (1-4 years) and children and adolescent (5-18 years). Two food categories: burgers and chicken, turkey and game, which are contributors to salt intake for children and adolescents were not included in the list of 40 food categories. These were added to the list of priority food categories.

### 4.2 Comparative analysis

There were five food categories not identified as contributors to saturated fat, sugar and salt in the Irish diet but targeted by the PHE Sugar and Salt reformulation programmes. These were added to the list of priority food categories for food reformulation: butter (80% fat), meat pies & pastries, processed & homemade potato products, vegetable & pulse dishes, and nuts, seeds, herbs & spices.

There were five food categories: other milks and milk-based drinks, fruit juice and smoothies<sup>d</sup>, other beverages, carbonated beverages & squashes, cordials & fruit juice drinks, retained in the priority

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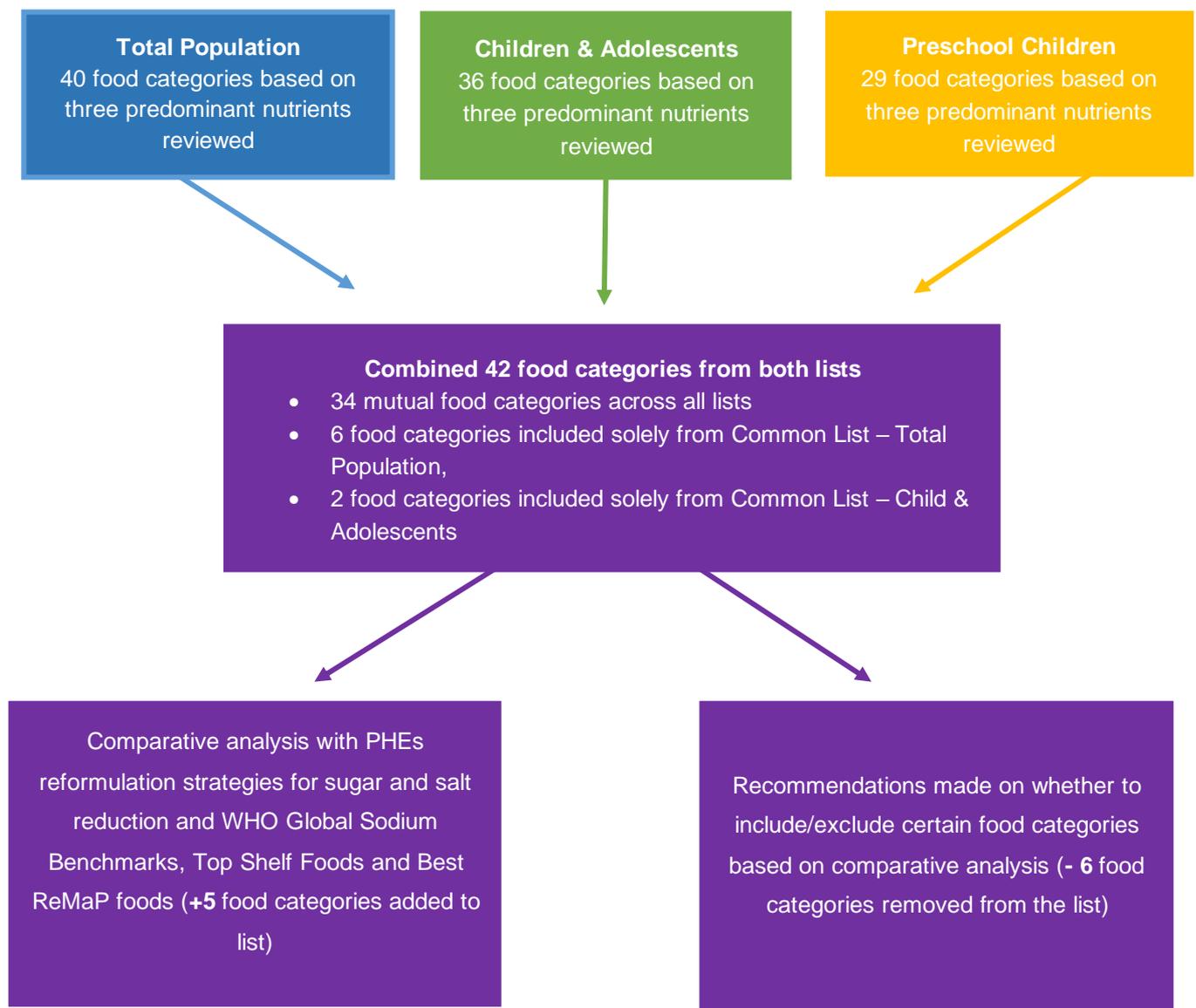
<sup>d</sup> In 2018 PHE also identified fruit juice and milk-based drinks as important contributors to sugar in the UK diet and added these food categories to the sugar reduction programme.

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food category list despite not being listed in the PHE Sugar and Salt reformulation programmes or WHO Global Sodium Benchmarks. These food categories were retained because of their substantial contributions to saturated fat, sugar and salt in the Irish population and their potential for reformulation.

There was agreement between the identified food categories in step one and top shelf foods and food categories targeted under JA Best-ReMaP.

The results of the food category identification and comparative analysis are outlined in Figure 3.



**Figure 3** Food category identification and comparative analysis

### 4.3 Recommendation of food category list for reformulation

Six food categories identified as contributors to saturated fat, total sugar and salt in foods in the Irish diet were removed from the priority list because either:

- the food category contained fresh produce and reformulation was inappropriate, or
- the food category was composed mainly of homemade dishes or
- the food category included alcoholic beverages.

These food categories were alcoholic beverages, whole milk, low fat & skimmed & fortified milks, eggs & egg dishes, bananas and other fruits.

The final list of 40 priority food categories for reformulation in Ireland can be found in Table 1. Description of food categories and examples of products in food categories is outlined in [Appendix 1, Table 3](#).

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**Table 1** Priority food categories (n = 40) for food reformulation in Ireland, the target nutrients they contribute to in the Irish diet (1 - 90 years) and whether considered suitable for nutrient or suggested serving size reduction

Food Categories	No. of Categories #	Energy (calories)	Saturated Fat	Sugar	Salt	Reformulation	Suggested Serving Size Reduction
Biscuits including crackers	4	✓	✓	✓	✓	✓	✓
Cakes, pastries & buns	4	✓	✓	✓	✓	✓	✓
Soups, sauces & miscellaneous foods	4	✓	✓	✓	✓	✓	✓
Chocolate confectionery	3	✓	✓	✓	X	✓	✓
Savouries	3	✓	✓	X	✓	✓	✓
White sliced bread & rolls	3	✓	X	✓	✓	✓	✓
Ready to eat breakfast cereals	3	✓	X	✓	✓	✓	✓
Cheeses	3	✓	✓	X	✓	✓	✓
Yoghurts	3	✓	✓	✓	X	✓	✓
Other fat spreads (40-80% fat)	3	✓	✓	X	✓	✓	✓
Beef & veal ready meals	3	✓	✓	X	✓	✓	✓
Meat products	3	✓	✓	X	✓	✓	✓
Other breakfast cereals	3	✓	✓	✓	X	✓	✓
Wholemeal & brown bread & rolls	3	✓	X	✓	✓	✓	✓

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Sausages	2	X	✓	X	✓	✓	✓
Ice-creams	2	X	✓	✓	X	✓	✓
Bacon & ham	2	X	✓	X	✓	✓	✓
Nuts & seeds, herbs & spices	2	X	X	✓	✓	✓	✓
Chipped, fried & roasted potatoes	2	✓	✓	X	X	✓	✓
Fish & fish products	2	✓	X	X	✓	✓	✓
Savoury snacks	2	✓	X	X	✓	✓	✓
Chicken, turkey & game	2	✓	X	X	✓*	✓	✓
Poultry & game ready meals	2	✓	X	X	✓	✓	✓
Sugars, syrups, preserves & sweeteners	1	X	X	✓	X	✓	✓
Non-chocolate confectionery	1	X	X	✓	X	✓	✓
Carbonated beverages	1	X	X	✓	X	✓	✓
Alternatives to milk & milks-based beverages	1	X	X	✓	X	✓	✓
Desserts	1	X	X	✓	X	✓	✓
Butter (over 80% fat)**	1	X	X	X	✓	✓	✓
Peas, beans & lentils	1	X	X	X	✓	✓	✓
Fruit juices & smoothies	1	X	X	✓	X	✓	✓

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Other breads	1	X	X	X	✓	✓	✓
Beef & veal	1	X	✓	X	X	✓	✓
Rice puddings & custard	1	X	X	✓	X	✓	✓
Burgers	1	X	X	X	✓ *	✓	✓
Other beverages	1	X	X	✓	X	✓	✓
Squashes, cordials & fruit juice drinks	1	X	X	✓	X	✓	✓
Meat pies & pastries	1	X	X	X	✓	✓	✓
Processed potato products	1	X	X	X	✓	✓	✓
Vegetable & pulse dishes	1	X	X	X	✓	✓	✓

# Number of target nutrients the food category is a contributor to.

\* Chicken, turkey and game and Burgers are contributors to sodium dietary intake in children and adolescence only.

\*\* Although butter was a source of saturated fat in the Irish diet, the legal composition of butter inhibits the reformulation of this nutrient.

The percentage contribution to population dietary intakes of target nutrients coming from the 40 priority food categories is summarised in Table 2.

**Table 2** Total percentage contribution of food categories suitable for reformulation to calorie and target nutrient intakes\*

	<b>Preschool children</b>	<b>Children</b>	<b>Adolescents</b>	<b>Adults</b>	<b>Older Adults</b>
	(1-4yrs)	(5-12yrs)	(13-18yrs)	(18-64yrs)	(65-90yrs)
	%	%	%	%	%
<b>Energy (calories)</b>	58	80.2	80.8	75.0	72.1
<b>Saturated Fat</b>	57	79.9	81.0	80.3	73.8
<b>Total Sugar</b>	47	68.7	73.1	68.5	62.9
<b>Sodium</b>	76	90.6	90.5	89.6	88.5

\*Target nutrients include saturated fat, total sugar and sodium and analysis based on final list of food categories (n = 40).

## 5. Conclusion and next steps

This report outlines the 40 priority food categories which will be targeted for food reformulation in Ireland.

Over the course of the lifetime of the Food Reformulation Task Force, these 40 food categories will be prioritised for industry engagement and the monitoring of reformulation progress. The Food Reformulation Task Force will engage with manufacturers, retailers and the Out of Home Sector about the reduction of energy and / or target nutrients in priority food categories.

Average nutritional content of these 40 food categories has been calculated and is available in a subsequent report [here](#). These averages will be used to develop a baseline for monitoring food reformulation against and the methodology for doing this is published [here](#). A report specific to targets and monitoring of foods explicitly aimed towards babies and young children will be scoped in the second half of 2023.

## 6. References

1. Department of Health. A Healthy Weight for Ireland: Obesity Policy and Action Plan 2016 – 2025. In: Health Do, ed. Dublin: The Stationery Office; 2016.
2. Department of Health. Roadmap for Food Product Reformulation in Ireland. 2021.
3. Public Health England. Sugar reduction: achieving the 20%. 2017.
4. Public Health England. Salt reduction targets for 2024. 2020.

## Appendix 1

Table 3 Food categories description and examples

Food Categories	Description	Examples* of foods contained in categories
<b>Bacon &amp; ham</b>	Bacon and ham	Bacon rashers grilled, gammon steaks fried, ham
<b>Beef &amp; veal</b>	Beef and Veal	Fillet steak fried, mince beef, roast beef
<b>Beef &amp; veal ready meals</b>	Beef and veal dishes	Beef stew, lasagne, beef curry
<b>Biscuits including crackers</b>	Biscuits including crackers	Rich tea, boudoir biscuit, crispbread
<b>Burgers</b>	Burgers	Beef burger, lamb burger, takeaway burger
<b>Butter (over 80% fat)</b>	Butter	Butter, garlic butter, unsalted butter
<b>Cakes, pastries &amp; buns</b>	All cakes, pastries and buns	Apple slices, custard slices, brownies
<b>Carbonated beverages</b>	Carbonated beverages	Cola, orange, other fizzy drinks
<b>Cheeses</b>	Hard, soft and semi-soft cheeses	Brie, cheese spread, processed single serve cheeses
<b>Chicken, turkey &amp; game</b>	Chicken, turkey and game	Chicken breast fried, turkey leg grilled, roasted duck
<b>Chipped, fried &amp; roasted potatoes</b>	Chipped, fried and roasted potatoes	Chips, wedges, roast potatoes
<b>Chocolate confectionery</b>	Chocolate confectionery	Milk chocolate, truffles, chocolate bars, chocolate covered confectionery
<b>Desserts</b>	Desserts	Tiramisu, apple crumble, sponge pudding
<b>Fish &amp; fish products</b>	Fish and fish products	Cod baked, haddock breaded, fish fingers
<b>Fruit juices &amp; smoothies</b>	Fruit juices and smoothies	Mixed fresh juice, fresh apple juice, banana smoothie
<b>Ice-creams</b>	Ice-creams	Flavoured ice-cream, ice – cream with cone, ice – lollies and pops
<b>Meat pies &amp; pastries</b>	Meat pies and pastries	Sausage rolls, pork pies, chicken pies
<b>Meat products</b>	Meat products	Black pudding, chicken in batter, chicken Kiev
<b>Non-chocolate confectionery</b>	Non-chocolate confectionery	Lollipops, fruit gums, chewy sweets
<b>Nuts &amp; seeds, herbs &amp; spices</b>	Nuts, seeds, herbs and spices	Ginger, basil, cinnamon, cashew nuts (salted)
<b>Other beverages</b>	Other beverages	Cocoa with milk prepared for consumption, malt-based drink

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<b>Other breads</b>	All other breads	Garlic bread, malt bread, scones
<b>Other breakfast cereals</b>	All other breakfast cereal not classified as RTE	Porridge, cereal requiring cooking
<b>Other fat spreads (40-80% fat)</b>	Other fat spreads	Vegetable oil spreads, soya spread, dairy based spreads
<b>Alternatives to milk &amp; milk-based beverages</b>	All other milks and milk-based beverages	Flavoured milk, evaporated milk, plant-based drinks
<b>Peas, beans &amp; lentils</b>	Peas, beans and lentils	Baked beans, chickpeas (canned), mushy peas
<b>Poultry &amp; game dishes</b>	Poultry and game dishes	Chicken stir-fry, chicken pasta, turkey curry
<b>Processed &amp; homemade potato products</b>	Processed and homemade potato products	Hash potatoes, potato croquettes, garlic potatoes
<b>Rice puddings &amp; custard</b>	Rice puddings and custard	Rice pudding, canned, custard ready to eat, custard made with whole milk
<b>RTEBC</b>	Ready to eat breakfast cereal	Cornflakes, crispies, muesli
<b>Sausages</b>	Sausages	Pork sausages, beef sausages, frankfurters
<b>Savouries</b>	All savoury food products such as pizza, pancakes, sandwiches	Deep pan pizza, savoury pancakes (frozen), quiche
<b>Savoury snacks</b>	Savoury snacks	Popcorn, crisps, maize snacks
<b>Soups, sauces &amp; miscellaneous foods</b>	Soups, sauces, dressings and condiments	Vegetable soup, tomato sauce, mayonnaise
<b>Squashes, cordials &amp; fruit juice drinks</b>	Squashes, cordials and fruit juice drinks	Fruit drink prepared for consumption, fruit juice drink, ready to drink
<b>Sugars, syrups, preserves &amp; sweeteners</b>	Sugars, syrups, preserves and sweeteners	Sugar, honey, sweetener, fruit jam
<b>Vegetable &amp; pulse dishes</b>	Vegetable and pulse dishes	Garlic mushrooms, vegetable spring rolls, lentil salad
<b>White sliced bread &amp; rolls</b>	White breads and rolls	White sliced bread, white rolls, crusty, ciabatta
<b>Wholemeal &amp; brown bread &amp; rolls</b>	Wholemeal, wholegrain and brown bread	Brown rolls, multigrain bagels, granary bread
<b>Yoghurts</b>	Yogurt	Full fat fruit yogurt, 0% fat yogurt, twin pot yogurt

\*Examples only, list not exhaustive.



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