

HEALTHCARE AND LIFE SCIENCES

## Manufacturers of certain foods asked to reformulate nutritional content of products by 2025

In December 2021, the Food Reformulation Taskforce of the Department of Health and Food Safety Authority of Ireland (FSAI) (the **Task Force**) finalised the [Food Product Reformulation Roadmap for Ireland \(the Roadmap\)](#).

The Roadmap sets voluntary targets for certain manufacturers to improve the nutritional content of their products. The FSAI recently published the 40 priority food categories for reformulation and has so far identified 314 impacted manufacturers.

5 MIN READ



Obesity and overweight are seen as one of the biggest health challenges in Ireland at the moment, with recent [reports](#) indicating that 61% of adults and 34% of children are obese or overweight. The Task Force hopes that food reformulation will assist in tackling these issues.

In this publication, we provide an overview of the:

- main proposed changes to products
- what foods and manufacturers are caught by the Roadmap
- practical considerations for manufacturers in implementing the Roadmap

### Changes to food products

The proposed changes under the Roadmap include a requirement that manufacturers reduce the amount of saturated fat, salt and sugar in their food products. These are described in the Roadmap as 'Target Nutrients'.

Specifically the following reductions for Target Nutrients and energy (i.e. calories) should be met by 2025:

- 10% reduction in saturated fats
- 10% reduction in salt
- 20% reduction in sugar
- 20% reduction in calories

The Task Force have not yet published baseline figures from which these targets are set therefore the precise reduction target per 100g is awaited.

Other changes include a suggested serving size reduction for certain foods.

### What foods?

On 30 June 2022, the FSAI identified the [priority 40 food categories](#) for reformulation in Ireland, with the following foods being identified as those with the highest number of Target Nutrients:

- biscuits including crackers
- cakes, pastries and buns
- soups, sauces and miscellaneous foods (dressings and condiments)
- chocolate confectionary
- savouries (All savoury food products such as pizza, pancakes)
- sandwiches
- white sliced bread and rolls
- Ready to Eat Breakfast Cereals (**RTEBC**)
- cheeses
- other fat spreads (40-80% fat)
- beef and veal ready meals
- meat products
- other breakfast cereals (not RTEBC)

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The 40 food categories also include beverages, specifically:

- carbonated beverages
- other milks and milks based beverages (e.g. flavoured milk, goats' milk, evaporated milk)
- fruit juices and smoothies
- squashes, cordials and fruit juice drinks
- other beverages (e.g. cocoa with milk prepared for consumption, ovaltine, water)

At the moment, alcoholic beverages are not listed as a priority food category.

### Which manufacturers?

Manufacturers of pre-packaged food products within the 40 food categories fall within the scope of the Roadmap. Non pre-packaged food products are not currently in scope.

To date, the Task Force have identified 314 impacted manufacturers as supplying the Irish market with food products containing

Target Nutrients or calories on or above the 75th percentile in each food category. The Task Force have not published the names of the impacted manufacturers but intends to engage with them directly. The Task Force will liaise with these manufacturers in an effort to encourage their buy-in to reducing calories and/or Target Nutrients in their food products in line with the Road Map. Food brands on the Irish market which are purchased in the largest volume will also be identified and targeted by the Task Force.

The Task Force is also in the process of identifying manufacturers of food products for babies and young children, with a specific report outlining requirements for these products to be published later this year.

The Task Force also intends to engage with retailers and the Out of Home Sector (e.g. restaurants, cafes and bars) about the reduction of energy and / or Target Nutrients in the 40 food categories, as part of its strategy to engage with all stakeholders.

### Practical considerations for manufacturers

If the proposed changes to Target Nutrients are implemented by industry, they could potentially have a significant impact on the flavour, taste, texture, recipes and therefore sales of certain products. However, as recent trends suggest that the Irish consumer is making healthier food choices, this may present an opportunity for manufacturers to expand their target markets.

The Task Force commended the positive engagement by the food and drinks industry so far. Notwithstanding this, it is clear that further information on specific actions and targets for manufacturers are needed.

Pending further guidance from the Task Force, manufacturers should note that:

- compliance with the Roadmap is not currently compulsory, therefore any changes adopted will be voluntary. The Task Force indicated that legislation is not currently being considered.





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However if industry buy-in is not achieved by 2025, it will consider other options to achieve compliance.

- the targets are currently based on a year-on-year reduction of 2.2% to be achieved by 2025.
- it is unclear whether manufacturers who agree to comply with the Roadmap must meet all of the targets to claim they are compliant, or whether reductions in some of the Target Nutrients will be acceptable.
- while the Roadmap is voluntary, it is envisaged that certain self-regulatory standards will apply to manufacturers. These will include accountability requirements such as mandatory public reporting of compliance with the standards and achievement of targets. The Task Force is also considering potential bodies to oversee its implementation such as the FSAI.

- if volunteering to comply with the Roadmap, manufacturers should commence preparations for reducing Target Nutrients and energy. In doing so, manufacturers should consider:
  - » revising recipes and carrying out taste tests as early as possible
  - » using substitute ingredients
  - » alternative approaches to reducing Target Nutrient intake, e.g. reducing portion and serving sizes
  - » labelling implications
  - » budget formulations, cost and sales projections
  - » rebranding and marketing opportunities

It is important to note that the Roadmap is an evolving plan and therefore manufacturers should keep a close eye on any changes introduced by the Task Force.

The [Food Reformulation page](#) of the FSAI website went live on 1 June 2022.





For further information or assistance in dealing with food product regulatory requirements in Ireland, please contact Katie O'Connor, Partner, Róise Nic Ghráinne, Senior Associate or any other member of ALG's Healthcare and Life Sciences team.

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