



Údarás Sábhálteachta Bia NA hÉIREANN  
Food Safety AUTHORITY OF IRELAND

2024

## Food Reformulation Task Force:

Maximum per serving salt targets for  
pizza sold in the foodservice sector:  
consultation outcome



## **Maximum per serving salt targets for pizza sold in the foodservice sector: consultation outcome**

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**Food Safety Authority of Ireland**  
The Exchange, George's Dock, IFSC,  
Dublin 1, D01 P2V6

T +353 1 817 1300  
E [info@fsai.ie](mailto:info@fsai.ie)

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## Contents

<b>CONTENTS</b> .....	<b>1</b>
List of Figures .....	1
<b>GLOSSARY</b> .....	<b>2</b>
<b>1. INTRODUCTION</b> .....	<b>3</b>
1.1 Purpose.....	3
1.2 Consultation background.....	3
1.3 Consultation methodology .....	3
1.4 Consultation acknowledgements .....	4
<b>2. OVERVIEW OF CONSULTATION RESPONSES</b> .....	<b>5</b>
2.1 Number of responses and characteristics of respondents .....	5
2.2 Summary of responses by question .....	5
2.2.1 Do you agree or disagree with the draft maximum per serving salt targets for adult pizzas sold in Irish foodservice outlets? .....	5
2.2.2 Do you agree or disagree with the draft maximum per serving salt targets for children’s pizzas sold in Irish foodservice outlets? .....	7
2.2.3 Do you agree or disagree with the different subcategories of adult and children’s pizzas that the draft maximum per serving salt targets apply to? .....	8
2.2.4 Which of the draft maximum per serving salt targets would you consider the most useful in practice for reformulating the salt content of adult and children’s pizzas sold in Irish foodservice outlets? .....	10
2.2.5 Do you agree or disagree with the one-year timeframe to reduce the salt content in pizza sold in Irish foodservice outlets to below the draft maximum per serving salt targets? .....	12
2.2.6 Responses to invitation to provide any other comments or feedback relevant to the draft maximum per serving salt targets for adult and children’s pizzas sold in Irish foodservice outlets? ... ..	13
<b>3. DISCUSSION</b> .....	<b>14</b>
<b>4. CONCLUSION</b> .....	<b>15</b>
<b>5. REFERENCES</b> .....	<b>16</b>

## **List of Figures**

Figure 1 Overview of the sector of employment of the consultation respondents .....	5
Figure 2 Percentage of respondents who agree or disagree with the draft maximum per serving salt targets for adult pizzas sold in Irish foodservice outlets .....	6
Figure 3 Percentage of respondents who agree or disagree with the draft maximum per serving salt targets for children’s pizzas sold in Irish foodservice outlets .....	7
Figure 4 Percentage of respondents who agree or disagree with the different subcategories of adult and children’s pizzas that the draft maximum per serving salt targets apply to .....	8
Figure 5 Percentage of respondents who preferred maximum per serving salt targets per 100 g, per pizza slice or per whole pizza .....	10
Figure 6 Percentage of respondents who agree or disagree with the one-year time frame to reduce the salt content in pizza sold in Irish foodservice outlets to below the draft maximum per serving salt targets .....	12

## Glossary

Term	Text
<b>EU</b>	European Union
<b>EFSA</b>	European Food Safety Authority
<b>FRT</b>	Food Reformulation Task Force
<b>FSAI</b>	Food Safety Authority of Ireland
<b>g</b>	gram
<b>PHE</b>	Public Health England
<b>SMEs</b>	Small and medium-sized enterprises
<b>UK</b>	United Kingdom
<b>WHO</b>	World Health Organization

## 1. Introduction

### 1.1 Purpose

The purpose of this report is to summarise the feedback received in response to the public consultation on the draft maximum per serving salt targets for pizza sold in the Irish foodservice sector, which was open between 1 July and 29 July 2024.

### 1.2 Consultation background

A [Roadmap for Food Product Reformulation in Ireland](#) requires the Food Reformulation Task Force (FRT) to develop maximum per serving salt targets for the eating out of home, foodservice sector (Department of Health, 2021). To date, there has been a lack of nutrition composition information for food products sold in the Irish foodservice sector. This absence of information has presented a challenge in setting maximum per serving salt targets. To address this information gap, the FRT has built upon previous research published by *safe*food (2012) by establishing a 2023 benchmark of the salt content of pizzas, a subcategory of the “Savouries” priority food category. Full details of the survey methodology and results are published in the [Benchmarking the salt content of pizza sold in the foodservice sector in 2023](#) (FSAI, 2024a). In summary, this survey revealed notably high salt content in a variety of adult and children’s pizzas sold in restaurant and takeaway outlets. The mean salt content of a convenience sample of adult pizza (n=47) was 7.27 g/100g, ranging from 3.34–11.01 g/pizza and for children’s pizza was 2.73 g/pizza, ranging from 1.31–4.68 g/pizza. Additionally, a large variation in the salt content across different pizza subcategories was found. The presence of pizzas with lower salt content in each subcategory demonstrated that it is technically feasible and acceptable to the consumer for the foodservice sector to make and offer pizza with a lower salt content. These findings indicate that pizza is a food category which requires particular attention for salt reduction. To address this, the FRT developed draft maximum per serving salt targets for pizza sold in foodservice outlets, aligning with global best practice and recommendations (FSAI, 2024b).

### 1.3 Consultation methodology

A document outlining the draft maximum per serving salt targets for adult and children’s pizzas sold in Irish foodservice outlets, and the rationale and the methodology behind their development, was published on the FSAI website for public consultation. The consultation was open for interested parties to submit their feedback on the draft salt targets from 1 July 2024 to 29 July 2024. The consultation documents can be found on the FSAI website [here](#).

A notification to participate in the consultation was circulated to the FRT network of food businesses, stakeholders, trade bodies and the FSAI’s foodservice forum. Other mechanisms used to extend the reach of the consultation included targeted emails to key pizza stakeholders (pizza suppliers, pizza

providers and meal delivery facilitators) and posts to the FSAI social media accounts inviting interested parties to provide their feedback.

Submissions to the public consultation were made through an online questionnaire hosted by an online survey platform. The questionnaire consisted of five technical questions and an invitation to provide an open-ended written response was included to collect additional feedback. The consultation responses were extracted from the online survey platform and transferred to Microsoft Excel.

The consultation responses were analysed using both qualitative and quantitative statistical methods in Microsoft Excel. Frequency statistics were used to analyse the responses to closed questions and thematic narrative analysis was undertaken to analyse responses to open-ended questions inviting any additional feedback or comments.

The responses received from the consultation will be considered alongside any changes required in advance of finalizing the maximum per serving salt targets for both adult and children's pizzas, sold in the foodservice sector and accompanying guidance. The final maximum per serving salt targets will be published in September 2024.

### **1.4 Consultation acknowledgements**

The FSAI would like to thank all interested parties and stakeholders for taking the time to provide their feedback during this public consultation process.

## 2. Overview of consultation responses

### 2.1 Number of responses and characteristics of respondents

In total, six responses were received. The respondents were from across the food industry including the foodservice sector (n=2), food retail sector (n=1), government body/other state agency (n=2) and 'other' (n=1). The sector of employment of the consultation respondents is shown in Figure 1.

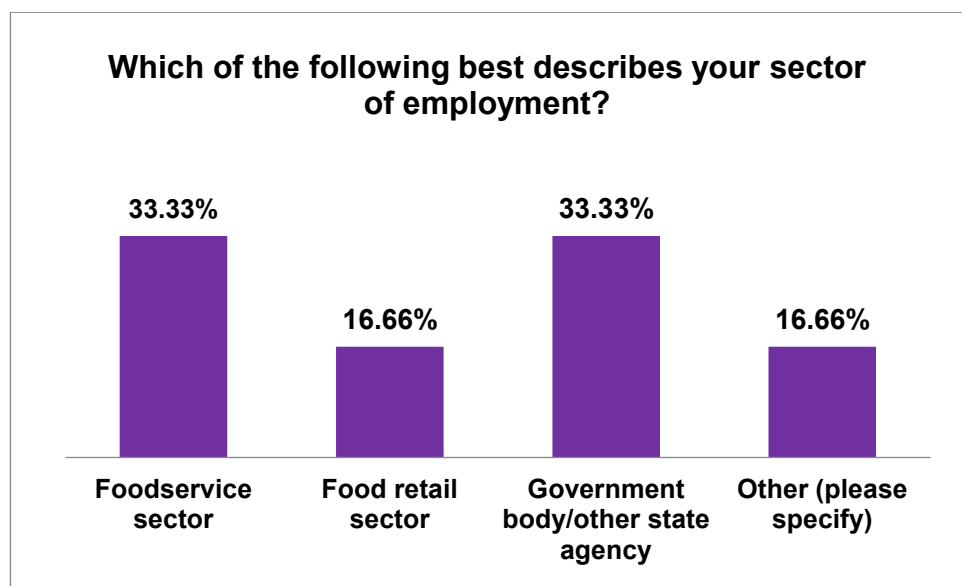


Figure 1 Overview of the sector of employment of the consultation respondents

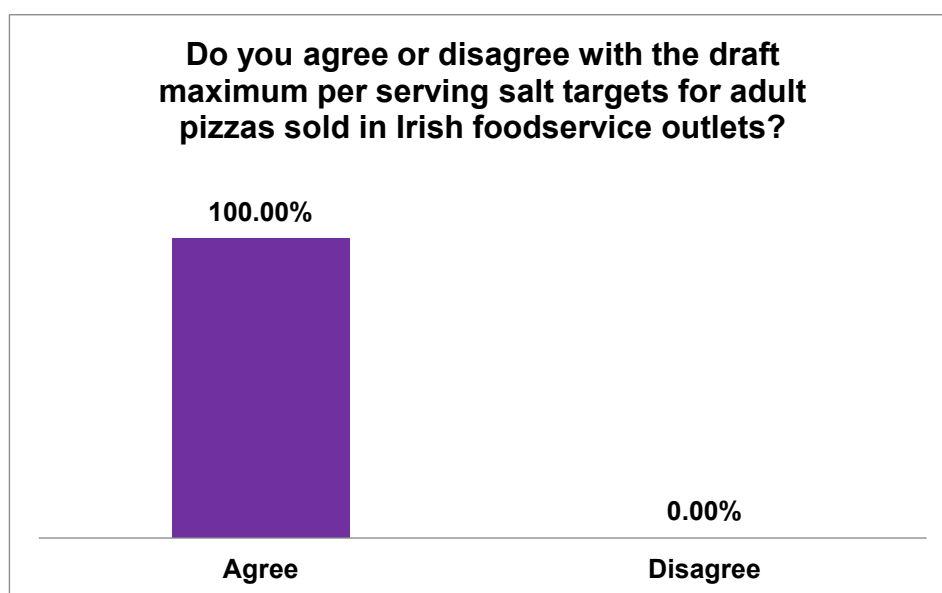
### 2.2 Summary of responses by question

#### 2.2.1 Do you agree or disagree with the draft maximum per serving salt targets for adult pizzas sold in Irish foodservice outlets?

All those who responded to the consultation, 100% (n=6), agreed with the draft maximum per serving salt targets for adult pizzas sold in Irish foodservice outlets, this is shown in Figure 2.



## Maximum per serving salt targets for pizza sold in the foodservice sector: consultation outcome



**Figure 2** Percentage of respondents who agree or disagree with the draft maximum per serving salt targets for adult pizzas sold in Irish foodservice outlets

All six respondents who agreed with the draft maximum per serving salt targets provided additional commentary and context to their responses. Overall, there was strong support for maximum per serving salt targets to be developed for pizza sold in the Irish foodservice sector. Respondents commended the maximum per serving salt targets and welcomed the approach being taken.

One respondent said

*“Our agreement is based on several key factors which align with our mission to enhance / support public health policies aimed at addressing non-communicable disease and improve population health. High salt content in current offerings, health implications of excessive salt intake, alignment with public health strategies - The draft salt targets are in line with global best practises recommended by the WHO.”*

Another respondent said

*“We welcome these targets were considered against the European Union (EU) and international daily intake threshold for salt (EFSA, 2019; WHO, 2023), the WHO sodium benchmarks for priority food categories (WHO, 2024) and the PHE salt reduction targets for food categories based in the foodservice sector (PHE, 2020)” and “are in line with global best practises recommended by the WHO”.*

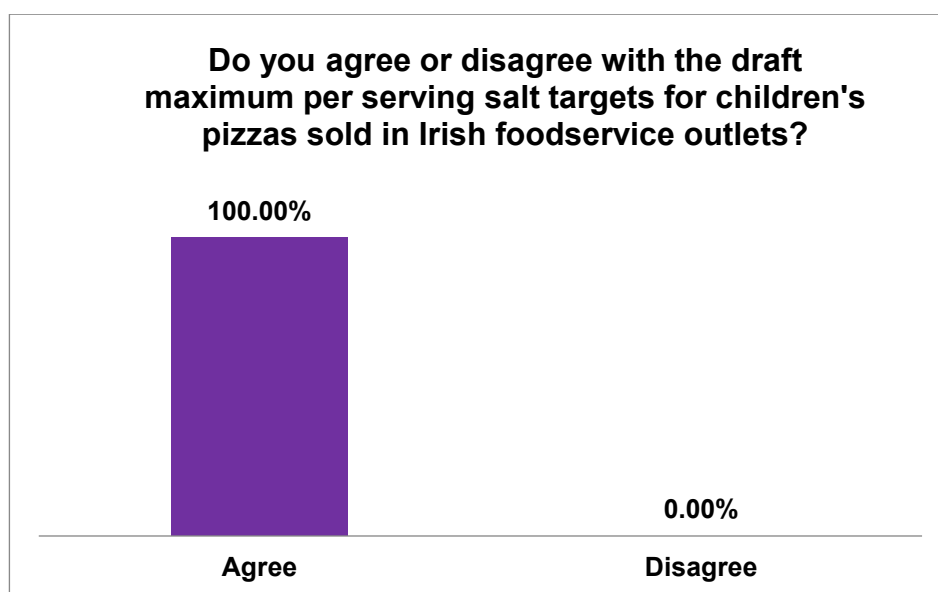
## Maximum per serving salt targets for pizza sold in the foodservice sector: consultation outcome

Another respondent highlighted achieving these targets will depend on ingredient suppliers offering more low-in salt and salt free options

*“.....reduction in salt content would depend on supply chain availability and our supplier’s engagement with reformulation.”*

### 2.2.2 Do you agree or disagree with the draft maximum per serving salt targets for children’s pizzas sold in Irish foodservice outlets?

All those who responded to the consultation, 100% (n=6), agreed with the draft maximum per serving salt targets for children’s pizza sold in Irish foodservice outlets, this is shown in Figure 3.



**Figure 3** Percentage of respondents who agree or disagree with the draft maximum per serving salt targets for children’s pizzas sold in Irish foodservice outlets

All six respondents who agreed with the draft maximum per serving salt targets provided additional commentary and context to their responses. Overall, there was strong support for maximum per serving salt targets for children’s pizza sold in the foodservice sector. All respondents welcomed the draft salt targets for children.

One respondent said

*“it is welcomed to see special consideration for children given the popularity of pizza for children as a menu item in food service outlets in Ireland”*

Another respondent commented that:

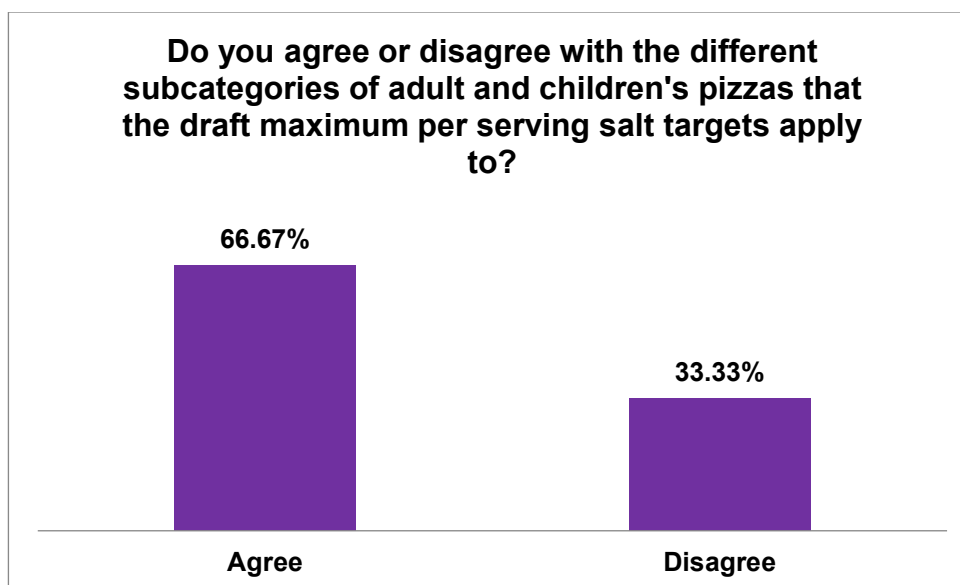
*“Specific targets tailored to children’s requirements is a sensible approach. If the different dietary needs and consumption patterns of these groups, allowing for more targeted and effective reformulation targets”.*

A respondent highlighted the success of these targets being dependent on their implementation and monitoring

*“Salt levels do need to be reduced but how this is implemented at food service level and monitored will be the issue.”*

### 2.2.3 Do you agree or disagree with the different subcategories of adult and children’s pizzas that the draft maximum per serving salt targets apply to?

Of the six responses, 66.67% (n=4) agreed with the different subcategories of adult and children’s pizzas, and 33.33% (n=2) disagreed, this is show in Figure 4.



**Figure 4** Percentage of respondents who agree or disagree with the different subcategories of adult and children’s pizzas that the draft maximum per serving salt targets apply to

Of the respondents that agreed (n=4) with the pizza subcategories, their feedback highlighted the subcategories are in line with what is commonly offered by foodservice outlets.

## Maximum per serving salt targets for pizza sold in the foodservice sector: consultation outcome

*“The different subcategories of adults and children's pizza proposed in respect of draft maximum per serving salt targets appear to be in keeping with the nature of the menu offering for pizza in food service.”*

Of the respondents who disagreed with the pizza subcategories proposed, one respondent stated that their business does not sell children's pizza

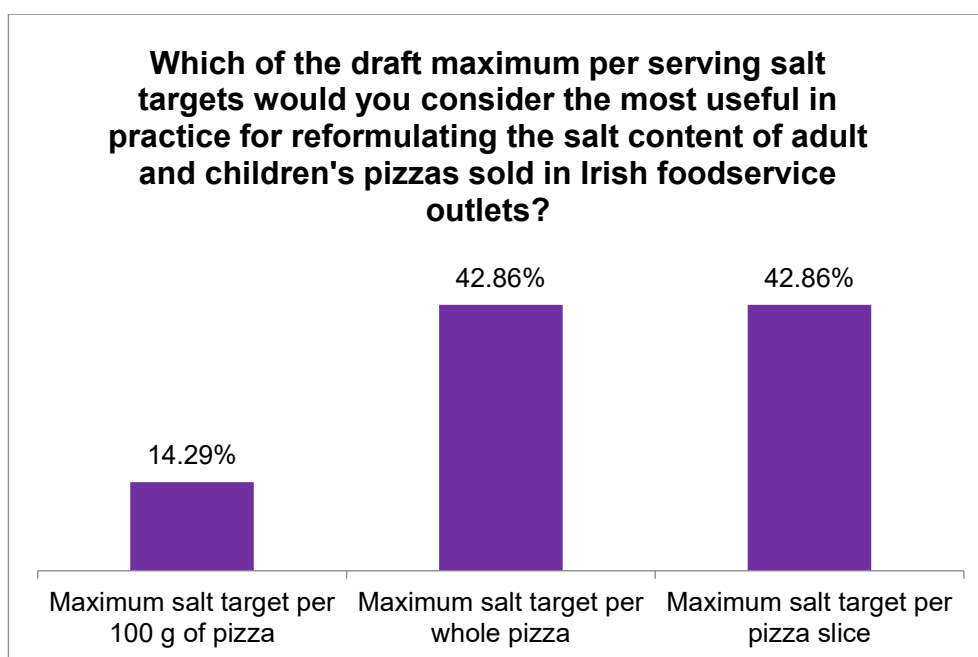
*“In our business we don't sell children's pizzas. We serve larger pizzas for families to share.”*

Another respondent raised a concern around the subcategory labelled “other toppings”

*“Other toppings' is broad/ slightly ambiguous (description noted in footnote of the benchmarking report) category, could be further defined for clarity.”*

## 2.2.4 Which of the draft maximum per serving salt targets would you consider the most useful in practice for reformulating the salt content of adult and children’s pizzas sold in Irish foodservice outlets?

Of the six responses, the majority of respondents were in favour of maximum per serving salt targets per pizza slice or per whole pizza. Only one respondent selected a preference for maximum per serving salt targets per 100 g of pizza. This is shown in Figure 5.



**Figure 5** Percentage of respondents who preferred maximum per serving salt targets per 100 g, per pizza slice or per whole pizza

One respondent suggested a dual target approach

*“In reality, pizza is not consumed per 100g. However, the maximum salt target per 100g of pizza is a standardised method and will enable consistent measurement and comparison across different pizza types and sizes - thus facilitating easier reformulation and compliance monitoring. A dual threshold could be considered to set targets for per 100g and per whole pizza.”*

Other respondents outlined a target per pizza slice would be preferable

*“use of a maximum salt target per pizza slice (per portion) is the most useful approach as it takes account of the fact that pizza is available to purchase on a per slice basis.”*

*“per slice, as long as there is consistency in the slice size would be most useful in terms of consumer understanding.”*

## Maximum per serving salt targets for pizza sold in the foodservice sector: consultation outcome

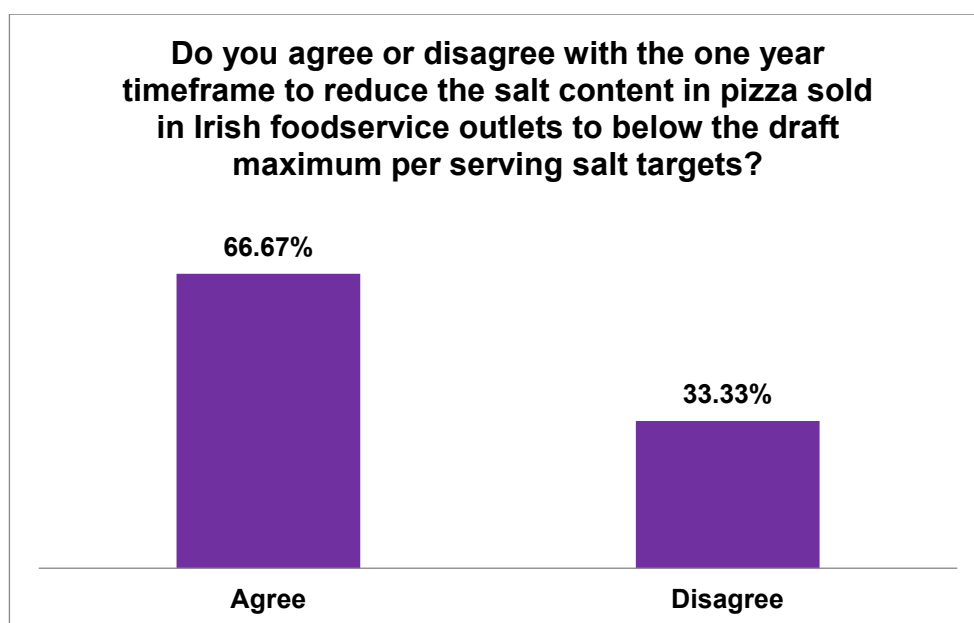
Finally, other respondents outlined a preference for a target per whole pizza

*“Easier for customers to understand. We don’t sell pizzas by the slice. Per 100g is for food labelling, not for finished dishes in a food service business.”*

*“A whole pizza approach may be more feasible for smaller businesses who might not have the technical ability to calculate nutrients per gram weight and by setting a max target per pizza, the smaller size offerings will be below the threshold as it’s unlikely that a recipe formula will change based on pizza size.”*

## 2.2.5 Do you agree or disagree with the one-year timeframe to reduce the salt content in pizza sold in Irish foodservice outlets to below the draft maximum per serving salt targets?

Of the six responses, 66.67% (n=4) agreed with the one-year timeframe to reduce the salt content in pizza sold in Irish foodservice outlets to below the draft maximum per serving salt targets and 33.33% (n=2) disagreed. This is shown in Figure 6.



**Figure 6** Percentage of respondents who agree or disagree with the one-year time frame to reduce the salt content in pizza sold in Irish foodservice outlets to below the draft maximum per serving salt targets

One respondent who supported the proposed timeframe stated

*"is welcomed and will provide the foodservice with suitable time to achieve compliance over a considerable period".*

Some respondents agreed with the timeframe, whilst also highlighting some potential challenges to achieving reformulation within a one-year timeframe

*"...food business capacity and resources should be considered. A one-year timeframe may be challenging for foodservice outlets that are SMEs or owner operated."*

## Maximum per serving salt targets for pizza sold in the foodservice sector: consultation outcome

*“Agree, however as noted above our business relies on suppliers reformulating their products so this would be the only perceived barrier.”*

Respondents who disagreed with the timeframe raised barriers to achieving this timeframe

*“I think more time required as a lot to be considered Are food service business expected to get nutritional's done on all types of pizzas and different pizza sizes.”*

Another respondent suggested a longer timeframe

*“A 2-year time frame is more realistically achievable.”*

### **2.2.6 Responses to invitation to provide any other comments or feedback relevant to the draft maximum per serving salt targets for adult and children’s pizzas sold in Irish foodservice outlets?**

Of those who responded, five provided additional commentary. Recurring themes from this commentary are described here.

The publication of the draft targets was welcomed by some respondents

*“We support the approach being taken by the Food Reformulation Task Force to ensure that there is a mechanism in place to consider and reduce the salt content of all pizza sold in foodservice in Ireland.”*

Feedback was also provided on additional measures and other approaches which could be considered

*“Calorie labelling should be considered alongside all reformulation initiatives - a primary population health issue is the high energy content of foods eaten outside of the home.”*

*“Pizza producers need to be targeted also”*

*The policy should apply to all independent pizza businesses, as well as the groups. It should also include the traditional Irish/Italian 'Chippers' that sell pizzas as part of their menu. And dine-in pizza restaurants too.*



### 3. Discussion

This report summarises the feedback received in response to the public consultation on the draft maximum per serving salt targets for pizza sold in the Irish foodservice sector. The consultation was open from 1 July 2024 to 29 July 2024, and 6 responses were received during this duration.

In general, respondents agreed with the draft maximum per serving salt targets for adult and children's pizza sold in Irish foodservice outlets. The need for such targets, in the context of a high numbers of people living with overweight and obesity, and the increased risk of cardiovascular diseases as a result of high salt dietary intakes, was recognised by several respondents.

Feedback on pizza subcategorisation was generally positive. Respondents agreed that the subcategorisation used was a fair representation of the types of pizza sold in foodservice outlets. The majority of respondents agreed with the need for different targets for children's and adults' pizza. It was outlined that additional detail was needed in the description of pizza with 'other toppings', and this will be considered when preparing the final targets. Based on this feedback it is not expected that any changes will be made to the subcategorization used, however additional detail may be added to the description of the subcategory, pizza with 'other toppings'.

The majority of respondents were in agreement with the timeframe, of one year, to achieve the targets. However, some concerns were raised around foodservice outlets being able to analyse and augment recipes in a one-year time period. Respondents also highlighted that the implementation and monitoring of conformance with the targets would be key in ensuring their adoption within the one-year time period. The task force will take this into account; however, it is important to note that the request to the food industry to reduce salt in their foods, is not new. The implementation of the [Roadmap for Food Product Reformulation in Ireland](#) has been ongoing since the beginning of 2022, and the food industry has been aware of the requirement to reduce salt in their foods.

In relation to whether targets per 100 g, per slice and per whole pizza should be used, a respondent recognised the usefulness of the per 100 g target for standardisation and monitoring. Having a standardised target, per 100 g, is something the task force is in favour of as it will allow for standardised comparison across outlets, pizza types and between foodservice and prepacked pizza. However, it was highlighted in responses received to this consultation that a per 100 g target would not be useful in practice and it was suggested a dual approach could be used, e.g. having a target per 100 g and per portion. This is a pragmatic suggestion and is something that is likely to be adopted. With regard to the type of portion a target should be set for, respondents were split between setting a target per slice and per whole pizza. To inform a decision on how best to proceed, the task force will consider the pros and cons of setting targets per slice and per whole pizza.

Respondents outlined some important considerations for the task force to take into account when finalising the targets. The important role of ingredient suppliers in offering lower salt ingredients was highlighted by some respondents. The task force currently engages with ingredient suppliers and will raise the feedback received in this consultation with them in future meetings. The task force will also consider establishing a database of ingredient suppliers as a resource to support reformulation efforts by the food industry. A second consideration is feedback on the need for clear communication on how uptake and conformance with these targets will be monitored, and details will be provided in the final guidance and during stakeholder communication.

### 4. Conclusion

Given the high salt content of pizzas sold to both adults and children by Irish foodservice outlets, and in line with the requirements set out in the [Roadmap for Food Product Reformulation in Ireland](#) (Department of Health, 2021), the FRT has developed draft maximum per serving salt targets for pizzas served in the Irish foodservice sector. The consultation feedback received in relation to these draft targets has been outlined in this report. Following the completion of this consultation, the FRT will consider the feedback provided by all parties and will reflect this when finalising the maximum per serving salt targets for adult and children's pizza sold in the Irish foodservice outlets. The final maximum per serving salt targets will be published by September 2024.

## 5. References

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**Food Safety Authority of Ireland**

The Exchange, George's Dock, IFSC,  
Dublin 1, D01 P2V6

T +353 1 817 1300

E [info@fsai.ie](mailto:info@fsai.ie)



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