Dear Minister

RE: Support to strengthen the Health Star Rating system and increase uptake

We wrote to members of the Australia and New Zealand Ministerial Forum on Food Regulation in June 2019 regarding the Health Star Rating (HSR) system and we thank you for your response.

We write again in the lead up to the next Forum meeting in November to express our support for all the recommendations in the final report and highlight further improvements for the HSR calculator (recommendation 4) and increasing uptake (recommendation 9).

Overweight and obesity is a significant problem in Australia and unhealthy diets are the major contributor. Two-thirds of Australian adults and one in four children are overweight or obese, and unhealthy foods make up around 40 percent of daily energy intake. These foods are heavily promoted, accessible and affordable. There is a crucial need for clear labels to provide information that helps people understand the healthiness of foods and choose between products.

We applaud the Forum’s recent decisions to progress added sugars labelling and energy labelling on alcoholic drinks through Food Standards Australia New Zealand (FSANZ), as well as enhancing national consistency on fast food menus. We are keen to see this work progress quickly and we urge you to build on this momentum to support the HSR to achieve its potential as a valuable tool for consumers, rather than a marketing tool for industry.

We strongly urge you to support all the recommendations in the final HSR review as the bare minimum required to strengthen the system, with further improvements to recommendations 4 and 9.

Recommendation 2 – removing the energy icon as an option

We highlight our strong support for removing the energy icon from the HSR graphic options, as recommended in the final report. The energy icon is the least preferred graphic by consumers, and it is poorly understood. In particular, it is inconsistently applied across products and does not include an interpretive element, limiting its usefulness as part of the HSR system.

Recommendation 4 – a package of changes to the Health Star Rating calculator

We support recommendation 4 and its sub-recommendations as an essential starting point, noting the need to further improve the treatment of sugars and sodium.

- Recommendation 4B on sugars is a positive step towards improving the calculation of sugars. However, further action is required to deal with the massive contribution of added sugars to dietary intake and unhealthy weight gain. We seek a firm commitment from the Forum that added sugars will be incorporated into the calculator as the basis for sugar measurement once a decision is made to introduce added sugars into the nutrition labelling requirements of the Food Standards Code.
• **Recommendation 4D on sodium** is a positive step towards improving the treatment of sodium in the algorithm. However, it is inadequate to deal with the excess sodium in Australian diets, mostly from processed foods. Excess sodium contributes to high blood pressure (hypertension), which affects six million Australian adults and is a major risk factor for heart attack and stroke. The current recommendation only targets foods with the highest levels of sodium but provides no incentive for the majority of salty products to be reformulated. We strongly urge the Forum to improve sodium sensitivity by adopting further changes to the points table, as recommended in the additional sodium option from the draft review (p102).

**Recommendation 5 – changes to the ratings for non-dairy beverages**

We also highlight our support for the improvements to recommendation 5, which provides a solution to the challenging category of non-dairy beverages and better aligns with the Dietary Guidelines. We support this recommendation as it better reflects the nutritional profile of high sugar fruit juice.

**Recommendation 7 – changes to the governance of the system**

We highlight our strong support for changes to the HSR system governance, including transferring the HSR calculator and TAG database to FSANZ to increase transparency, enhance government leadership, and mitigate the risk of real or perceived conflicts of interest in HSR policymaking.

**Recommendation 9 – mandating the system if voluntary targets are not met**

We support making the HSR system mandatory to meet the system’s objective to provide ‘convenient, relevant and readily understood nutrition information and/or guidance on food packs to assist consumers to make informed food purchases and healthier eating choices.’

Currently only one-third of eligible products display the HSR, hampering consumers’ ability to compare products and undermining the system’s purpose. We applaud the efforts of the major supermarket retailers to incorporate ratings onto all their private label products, which now make up more than half of all uptake. We believe that voluntarily increasing uptake among other manufacturers will be challenging due to the lack of commercial incentives to display ratings on products that would receive lower stars. Insufficient uptake prevents the system from achieving its purpose and creates an uneven playing field for industry.

We support recommendation 9 as a positive step towards increasing uptake and we seek a firmer, detailed commitment to prevent subsequent delays. We highlight the importance of specific, measurable, attributable, realistic, and time bound (SMART) commitments with a clear definition of an appropriate denominator of total ‘target’ (eligible) products, independent and transparent monitoring, and regular reporting. If ongoing reporting suggests voluntary targets are off-track, we support preparations commencing with FSANZ to develop an appropriate standard for mandating the system by the agreed deadline to prevent further unnecessary delays.

At a minimum, we support the draft report’s recommendation of 70 percent uptake by 2023. To better achieve the system’s objectives, our preference is for a higher target of 80-90 percent within 2-3 years. We note that the HSR system was first introduced in 2014 and the previous Forum supported a mandatory approach if uptake was inadequate after the first two years: “If, following evaluation after two years, a voluntary implementation is found to be unsuccessful, a mandatory approach will be required. This would require Food Standards Australia New Zealand (FSANZ) to develop a standard.”

**Support for all recommendations**

We reiterate our support for all the recommendations from the final review as the bare minimum required to strengthen the system and achieve its aim.

The five-year review provides an opportunity to improve the effectiveness of the system and we strongly urge you to support all the recommendations, with further improvements to recommendations 4 and 9.
We highlight that the purpose of the system is to provide clear and accurate information on products, and we urge you to prioritise the food regulatory system aims of enabling consumers to make informed choices and supporting public health objectives\(^1\) when the Forum considers each recommendation.

We would welcome the opportunity to discuss this with you further or provide additional detail in order to improve the diets and health of Australians.

Sincerely

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Please note that input from the Heart Foundation to the Australian Chronic Disease Prevention Alliance (ACDPA) position on the HSR system has been limited to feedback on technical aspects of the system.

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