Dear Minister

RE: Strengthening the Health Star Rating system

As a group of leading public health and consumer organisations, we support continuation of the Health Star Rating (HSR) system and improvements to the system as part of the five-year review.

Diets high in unhealthy foods contribute to unhealthy weight gain and many chronic diseases. Clear and accurate information on food products is essential to improve health as part of a broader prevention strategy.

We appreciate the Ministerial Forum’s consideration of the Health Star Rating system at the next meeting and strongly urge you to support improvements to ensure the system works for consumers, not just food companies.

As such we strongly recommend changes to how the HSR is calculated:

- An automatic 5-star rating for fresh and minimally processed fruits and vegetables
- Added sugars be incorporated into the algorithm. If that isn’t possible because it is not yet in the Nutrition Information Panel, we recommend the sugar points table be extended to 30 points to receive equal treatment to saturated fat and sodium
- Sodium sensitivity should be improved. Reducing the upper limit of the table to 30 points for sodium content >2,700mg/100g would produce results only for very salty foods. A better solution would be to update the entire sodium points table to align with the updated sodium Nutrient Reference Value. This would increase the incentive for the 93% of food products with sodium <900mg/100g to reformulate.
- A protein tipping point of 11 baseline points to prevent foods relatively high in risk nutrients obtaining high HSRs from adding unnecessary protein
- Improvements to the method of assigning HSRs to non-dairy beverages. Presently, the HSRs for some beverages do not properly reflect dietary guidance and their relative nutritional value. Greater transparency and modelling are required to understand the effect of any proposed changes to this category. We are particularly concerned that some fruit and vegetable juices would continue to receive high ratings under proposed changes, and we are concerned about the potential creation of a new category, unsweetened flavoured water, exempt from the algorithm
- Rescale Category 3 upwards (to 15-20%) to improve the HSR of healthier oils and better align with the evidence base for healthier oils within a healthy eating pattern.

These recommendations are also broadly consistent with State and Territory positions submitted in earlier consultations but were not reflected in February’s Draft Review Report. We believe this makes it
even more important for recommendations on HSR’s governance to be adopted to ensure independence and transparency, and to protect HSR from undue industry influence.

**Calling for the HSR system to be made mandatory**

Currently only around one-third of eligible products are displaying the HSR system, meaning consumers do not have the information necessary to compare similar products. We strongly call for the HSR system to be made mandatory to meet the system’s objective to provide readily accessible information for consumers. If HSR remains voluntary for now, clear targets and timelines must be set (e.g. 90% participation by 2021), with failure to meet these automatically triggering mandatory implementation.

We highlight that any changes to the HSR system should be grounded in public health evidence, in line with the system’s purpose. Any modelling to assess the impact of changes to the algorithm, or decision about the ‘impact’ of a given option must take note of the percentage of products affected that are actually carrying an HSR label. This has implications for both consumer messaging and the actual cost to industry of any change.

We strongly support continuation and improvements to the system. The five-year review provides an opportunity to better align with the Australian Dietary Guidelines and the HSR 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.’

We highlight the importance of these recommendations in improving the accuracy and uptake of the system to improve consumers’ health. For more detail on these recommendations, please see our submissions to the five-year review.

We would welcome the opportunity to discuss this vital issue with you further. Almost every Australian eats a diet significantly sub-optimal to health and a strong HSR system provides a real opportunity to address diet-related ill health.

Sincerely

Sharon McGowan  
Chair  
Australian Chronic Disease Prevention Alliance

Bruce Neal  
A/g Executive Director  
The George Institute, Australia

Jane Martin  
Executive Manager  
Obesity Policy Coalition

Alan Kirkland  
CEO  
CHOICE

Steve Allender  
Director  
Global Obesity Centre (GLOBE)  
WHO Collaborating Centre for Obesity Prevention

Terry Slevin  
CEO  
Public Health Association of Australia

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.