5 June 2020

Dear Secretariat,

The Public Health Association of Australia (PHAA) is recognised as the principal non-government organisation for public health in Australia working to promote the health and well-being of all Australians. It is the pre-eminent voice for the public’s health in Australia, and seeks to drive better health outcomes through increased knowledge, better access and equity, evidence informed policy and effective population-based practice in public health.

PHAA welcomes the opportunity to provide input to the consultation on the implementation of the 5 year review of the Health Star Ratings (HSR) system. The HSR are an important opportunity to provide clear nutrition labelling for consumers. The 5 year review process has identified improvements of the system to improve alignment with the Australian Dietary Guidelines (ADG)¹ and consumer confidence in the system. These improvements must include the stronger treatment of sugar and salt, as reflected in calculator 2 to better align with the ADG. It is important that these improvements to the system are implemented as soon as possible so that consumers are able to benefit from a strengthened system.

A start date of 1 October 2020 will have limited immediate impacts on industry for a number of reasons. Firstly, the changes affect only a minority of products. Secondly, as a voluntary system only about one-third of all products display the HSR.² Finally, within the voluntary system, there are no meaningful penalties for non-participation. In combination with a 2 year transition period, the main effect of the implementation start date will be to provide certainty to manufacturers. Experience with mandatory country of origin labelling shows that a 2 year implementation period is sufficient to make labelling changes.

As a public health organisation, support for the HSR requires providing consumers with certainty that their concerns have been addressed and that an improved system will be in place soon, reflected in the HSRs on display in supermarket shelves. This requires that the changes arising from the 5 year review are implemented as soon as possible. From a consumer perspective, the processes are already long, and should not be extended further once a clear pathway has been identified. The 5 year review process and the evidence-based and agreed changes arising from it, provide this clear pathway. The further independent modelling reflected in calculator 2 builds upon these agreed changes with a stronger evidence-base for the improved alignment between the HSR and the ADG. These are precisely the changes consumers have been asking for, and which need to be seen by consumers as soon as possible.

We note that the implementation period will trigger not only the main 5 year review changes, but also changes which have been waiting for longer to be enacted since they were decided – such as the ‘as prepared’ changes. This further strengthens the need for immediate implementation.

² http://healthstarrating.gov.au/internet/healthstarrating/publishing.nsf/content/formal-review-of-the-system-after-five-years
The experience of COVID-19 has highlighted the importance of good nutrition to health and wellbeing. An improved HSR is an important element of enabling good nutrition through the provision of clear information to consumers. The quick and clear information provided through the HSR may increase in importance as shoppers try to minimise handling of products resulting in an increased reliance on the front-of-pack information.

While the distancing restrictions of COVID-19 has impacted negatively on many industries, Australian Bureau of Statistics data have shown increased consumption of some foods and beverages, and increased time cooking at home, suggesting that food manufacturers involved in HSR changes are unlikely to have seen significant negative financial impacts.

The PHAA appreciates the opportunity to make this submission and the opportunity to contribute to ensuring improved front of pack labelling for consumers in a timely way.

Please do not hesitate to contact us should you require additional information or have any queries in relation to this submission.

Yours Sincerely,

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