

FSANZ call for information: Health Star Rating and Nutrition Information Panel

Food Standards Australia New Zealand (FSANZ) is seeking information and evidence to help guide important work on front and back-of-pack nutrition labelling.

Response to Question 1: Information and Evidence to Support FSANZ's Preparatory Work on the Health Star Rating (HSR) System

Do you have any information and/or evidence which may support FSANZ in undertaking the preparatory work on the Health Star Rating (HSR) system? For example, information or evidence on the following topics would be useful:

- (a) consumer use, understanding and trust in the HSR*
- (b) influence of the HSR system on consumer perceptions of food and purchase intention*
- (c) elements of the HSR that work well for consumers*
- (d) elements of the HSR that work well for industry*
- (e) challenges with consumer use of the HSR system*
- (f) challenges with industry implementation of the HSR system*
- (g) potential impact on consumers of mandating the HSR system*
- (h) potential impact on industry of mandating the HSR system (including product reformulation)*
- (i) potential impact on enforcement activities of mandating the HSR system.*

a) Consumer Use, Understanding, and Trust in the HSR

Evidence from global studies indicates that front-of-pack nutrition labels (FOPNL), such as the Health Star Rating (HSR) system, are a World Health Organization (WHO)-recommended "best buy" policy for improving public health.¹ A review of global evidence highlights that interpretive FOPNLs, like the HSR system, are more effective than non-interpretive labels in helping consumers make healthier food choices.²

Although consumers generally view the HSR system as a helpful tool for making informed and healthier choices, scepticism among consumers exists about the transparency of the HSR system, particularly in regard to how scores are assigned and the perceived influence of industry involvement.^{3,4} This scepticism has been identified as a barrier to fully trusting the HSR system as a reliable nutritional indicator.⁵

Strengthening government leadership and improving transparency in the HSR governance framework are essential to build consumer trust.^{5,6} Increasing public visibility of government involvement and ensuring independent reviews of the HSR algorithm are potential solutions to address these concerns.

b) Influence of the HSR System on Consumer Perceptions and Purchase Intentions

The HSR system has been shown to positively influence consumer perceptions of food healthiness and to encourage healthier purchasing decisions.^{2,7} Consumers frequently report that the HSR system helps them make more informed choices, and evidence suggests that its display on food products is one of the most valued features when choosing healthier options.⁸

c) Elements of the HSR system that Work Well for Consumers

- **Simplicity and Ease of Use:** Consumers generally find the HSR system easy to understand and appreciate its simplicity.³ Studies indicate that the clarity of the label makes it an effective tool in guiding healthier choices.^{5,6}
- **Visibility and Consistency:** To maximise its impact, it is crucial that the HSR system is displayed on all products. Evidence shows that consumers find it valuable to have a consistent, easily visible label across product categories.⁴
- **Improved Display Specifications:** Improvements to the display of the HSR graphic, such as mandatory interpretive colours and size standards, could enhance its visibility and effectiveness, especially in online environments.⁹

d) Challenges with Consumer Use of the HSR System

While consumers largely support HSR, challenges persist due to low uptake of the system by industry, particularly on products with lower health star ratings.¹⁰ As a result, many consumers are unable to rely on the HSR system to easily identify healthier choices, particularly when lower-scoring products are not labelled.¹¹ Addressing these challenges requires expanding HSR coverage across all product categories and mandating its use to ensure full consumer access to informed choice.

e) Challenges with Industry Implementation of the HSR System

There is significant resistance among industry stakeholders to adopting the HSR voluntarily, particularly regarding products with lower health ratings.¹¹ This resistance has contributed to stagnation in HSR uptake, with current levels falling well short of targets.¹² Evidence suggests that mandating the system would provide the necessary regulatory certainty to overcome these barriers and increase HSR adoption across the food supply.¹³

f) Potential Impact on Consumers of Mandating the HSR System

Mandating the HSR system is expected to significantly enhance consumer ability to make healthier food choices by ensuring the presence of this labelling on all intended products.⁸ A mandatory approach would make it easier for consumers to compare products and make informed decisions, particularly with respect to identifying unhealthy foods.¹⁰

g) Potential Impact on Industry of Mandating the HSR System (Including Product Reformulation)

A mandatory HSR system would likely encourage industry to reformulate products to achieve higher ratings, as seen in other countries with mandatory labelling schemes.² In a voluntary system, industry adoption has been slow, particularly for lower-rated products, but evidence suggests that a mandatory system would drive product reformulation and improve the overall healthiness of the food supply.¹³

h) Potential Impact on Enforcement Activities of Mandating the HSR System

Mandating the HSR system would require robust monitoring and enforcement mechanisms to ensure compliance. Existing systems such as FoodSwitch in Australia and Nutritrack in New Zealand could be leveraged for ongoing monitoring of HSR labelling accuracy and coverage.¹¹ International examples, such as Singapore's pre-market registration system for FOPNL, demonstrate the feasibility of such a regulatory approach.¹⁴

Response to Question 2: Key Areas for FSANZ to Focus on for HSR Preparatory Work

Are there specific areas you would like FSANZ to focus on for the HSR preparatory work?

1. Mandating and Strengthening the HSR System

To ensure that the HSR system achieves its intended public health and consumer objectives, it is essential that FSANZ prioritise the mandatory implementation of the HSR system. Evidence indicates that a voluntary system has been insufficient in addressing entrenched consumer distrust and delivering consistent public health outcomes. Mandating the HSR system is the most effective approach to overcome these barriers and ensure that the HSR system functions as a tool for empowering consumers and improving public health outcomes.^{4, 8}

2. Drawing on Existing Evidence and Global Innovation in FOPNL

There is already a robust body of evidence regarding the performance and potential of the HSR system. Drawing on this existing research and lessons from global innovations in FOPNL can help FSANZ avoid unnecessary duplication and streamline its preparatory work. The evidence highlights that mandatory FOPNLs, such as the HSR system, have significant public health benefits.² FSANZ should focus on refining the HSR system based on this evidence, rather than commissioning extensive new consumer research. If further consumer studies are undertaken, FSANZ should focus on testing how a comprehensive package of reforms enhances the achievement of HSR's policy goals, rather than revisiting elements of the system.^{2, 15}

3. Focus Areas for FSANZ's Preparatory Work

To maximize the potential benefits of the HSR system for public health and consumers, FSANZ should prioritise the following areas:

a) Progressing the Mandate for HSR

FSANZ should expedite the preparatory work required to mandate the HSR system, ensuring this is prioritised ahead of any review of the Nutrition Information Panel (NIP). The biggest benefits to consumers will be realised by mandating the HSR, which will lead to broader coverage, greater transparency, and more informed consumer choices.¹²

b) Cost/Benefit Analysis Using Existing Data

FSANZ should start early on cost/benefit analysis, leveraging the substantial body of existing data on HSR's performance. This analysis should focus on the clear benefits of a mandatory system, recognising that even small shifts in dietary intake can significantly reduce disease risk and healthcare costs at the population level.¹³ FSANZ should be cautious when considering industry self-reports on costs and preferences, as commercial interests may conflict with the public health goals of the HSR system.

c) Strengthening HSR Governance

FSANZ should work with other government stakeholders to revise and strengthen the governance of the HSR system. Increased government leadership and the independence of scientific processes, particularly the review of the HSR algorithm, will be critical to restoring consumer trust. FSANZ must ensure that any review committees are independent of industry influence and are led by government, with input from unbiased scientific experts.^{1,6} This would align with global best practices in nutrition labelling, ensuring that the HSR system remains an effective public health tool.

d) Updating Visual Elements for Improved Salience and Visibility

FSANZ should test and update the visual elements of the HSR logo to improve its salience and visibility. Research suggests that mandating the use of interpretive colours (green, orange, and red) and removing the additional "tail" with nutrient icons would simplify the label, making it easier for consumers to interpret.⁹ Additionally, implementing uniform display requirements for size and placement across all products, including in online retail environments, would increase the likelihood that consumers notice and use the label when making purchasing decisions.¹⁶

e) Independent Periodic Reviews of the HSR Algorithm

FSANZ should establish a robust process for independent, periodic reviews of the HSR algorithm to ensure that it reflects the changing food supply, updated

scientific evidence, and dietary guidelines. These reviews should focus on addressing high-profile anomalies, such as products high in salt, added sugars, and unhealthy fats, that continue to receive high HSR scores despite being inconsistent with dietary recommendations. Reviews should be independent, transparent, and led by experts with no conflicts of interest. Regular reviews, ideally every five years, will ensure the system remains up-to-date and effective in promoting public health.¹⁷

Response to Question 3: Information and Evidence for FSANZ's Holistic Review of the NIP

Do you have any information and/or evidence which may support FSANZ in undertaking the holistic review of the NIP? For example, information or evidence on the following topics would be useful:

- (a) consumer use, understanding and trust in the NIP*
- (b) elements of the NIP that work well for consumers*
- (c) elements of the NIP that work well for industry*
- (d) elements of the NIP that work well for enforcement purposes*
- (e) challenges with consumer use of the NIP*
- (f) challenges with industry implementation of the NIP*
- (g) challenges with enforcement of the NIP or its use to support enforcement of other labelling elements*

a) Consumer Use, Understanding, and Trust in the NIP

The NIP is widely regarded as the most trusted and important nutrition label by consumers in Australia and New Zealand.⁸ A comprehensive review of global evidence on nutrient declarations confirms that NIPs enhance consumer understanding of the nutritional content of foods, contributing to healthier food choices.¹⁸ However, challenges remain regarding its accessibility, especially in digital environments, where NIPs are often not available prior to purchase.¹⁹ Consumers' trust in the NIP could be strengthened by ensuring the consistency and clarity of the label, as well as addressing discrepancies such as the optional inclusion of calories versus kilojoules.²⁰

b) Elements of the NIP that Work Well for Consumers

The NIP's clear presentation of core nutrients per 100g/mL, including energy, protein, total fat, saturated fat, carbohydrates, total sugars, and sodium, works well for consumers, particularly when it provides a standardised, easy-to-understand format. However, existing research indicates that the NIP could be further improved by including added sugars, dietary fibre, and total trans fats, which would enhance

consumer decision-making and support public health objectives.²¹ Additionally, consistent serving sizes and more straightforward language can improve clarity for a broader consumer base.

c) Elements of the NIP that Work Well for Industry

For industry, the NIP offers a consistent, standardised format for nutrient declarations that ensures compliance with regulations while allowing flexibility for different product categories. This transparency supports industry reformulation initiatives by providing a clear benchmark for nutrient content. However, industry would benefit from clearer guidelines on serving sizes, and there is scope for improvement in how added sugars are quantified, which could incentivise more widespread reformulation to meet public health goals.

d) Elements of the NIP that Work Well for Enforcement Purposes

The NIP plays a crucial role in enforcement by providing a standardised, transparent basis for monitoring compliance with nutritional standards. It helps regulatory bodies track adherence to food labelling regulations and supports the identification of products that do not meet the required nutritional criteria. The addition of mandatory ingredients such as added sugars, dietary fibre, and trans fats would further aid enforcement efforts by creating a clearer and more complete nutritional profile for products.

e) Challenges with Consumer Use of the NIP

Several challenges persist regarding consumer use of the NIP. One key issue is the inconsistency in serving sizes, which can make comparisons between products difficult.²¹ Additionally, the presence of competing and sometimes misleading claims (e.g., health claims, generic product claims) can distract consumers and undermine their ability to accurately interpret the NIP.⁹ Furthermore, the small size and poor visibility of NIPs on product packaging limit their utility.²¹ To address these, FSANZ could mandate standardised, more prominent NIP displays on product packaging, including online platforms.

f) Challenges with Industry Implementation of the NIP

Industry implementation of the NIP is complicated by factors such as discretionary serving sizes, variations in nutrient reference values, and the complexity of adding new mandatory elements like added sugars.²¹ Furthermore, the dual use of kilojoules and calories on labels can create confusion, with a tendency to emphasise the calorie count over kilojoules.²⁰ Aligning industry practices with clearer, more standardised labelling requirements could improve consistency across products and facilitate easier consumer interpretation.

g) Challenges with Enforcement of the NIP or Its Use to Support Enforcement of Other Labelling Elements

One major challenge for enforcement is the lack of a consistent and enforceable standard for added sugars across all products. The absence of mandatory quantification of added sugars in the NIP makes it difficult for regulatory bodies to monitor compliance with public health guidelines effectively. Additionally, the competing claims and complex serving size choices often result in confusion and inconsistent application of the NIP, complicating enforcement efforts. Ensuring that the NIP includes all relevant nutrients and follows consistent guidelines would help mitigate these challenges and support more effective enforcement.

Response to Question 4: Specific Focus Areas for FSANZ's Review of the NIP

Are there specific areas you would like FSANZ to focus on for the review of the NIP?

1. Retention of the NIP on Packages

The NIP is crucial for consumer understanding and public health initiatives, and its retention on food packages is essential. Any reforms to the NIP should demonstrate tangible benefits, ensuring that it remains a trusted and functional tool for both consumers and the broader public health framework.

2. Mandatory Information

The NIP should retain mandatory content for energy, protein, total fat, saturated fat, carbohydrates, total sugars, and sodium per 100g/mL. It is recommended that additional mandatory items such as added sugars, dietary fibre, and total trans fats be incorporated to enhance transparency and align with dietary guidelines.

3. Incorporation of Added Sugars

The mandatory quantification of added sugars in the NIP should be a priority in the review. This will allow consumers to make informed choices in line with dietary guidelines and incentivise reformulation by the food industry. There is an existing body of work that can support this transition.²² FSANZ should revisit challenges around defining and presenting added sugars, focusing on solutions that can be practically applied.

4. Clarifying Sub-Components of Macronutrients

Introducing terms such as "of which" or "includes" (e.g., "Total sugars x grams, of which/includes added sugars x grams") would improve consumer understanding of how sub-components like added sugars and saturated fats contribute to the overall nutritional profile.²¹ This approach aligns with global best practices and could further clarify important nutritional information for consumers.

5. Improving NIP's Visual Design

FSANZ should consider changes to the visual display of the NIP, including larger font sizes, standardised colours (without interpretive elements), and minimum size requirements to improve visibility and salience. Additionally, ensuring the NIP is displayed clearly in online retail environments, where it is often absent, should be prioritised.²³

6. Focus on Consumer Education and Trust

Consumer engagement with labelling systems is strongly influenced by trust. FSANZ should develop educational campaigns that promote trust in the NIP and HSR system, addressing the challenges posed by competing claims and conflicting interpretations of the information. Collaboration with experts from other jurisdictions on best practices and research is key to ensuring that changes are evidence-based and culturally appropriate.

Response to Question 5: Complementary Role of HSR and NIP

Do you have any information or evidence that specifically considers how the HSR system and the NIP can complement and support each other?

1. Complementary Functions of NIP and HSR

The NIP provides detailed, standardised information for those who want to make informed nutritional decisions, while the HSR offers a quick, interpretive at-a-glance guide for broader consumer accessibility. These two labels work together to support consumers in making healthier food choices. The NIP is essential for interpreting the HSR, ensuring that both labels align with dietary guidelines and public health goals.

2. Enhancing HSR with NIP Data

To improve the effectiveness of the HSR system, it should be strengthened by incorporating data from the NIP, such as added sugars, which would refine the HSR algorithm and improve its public health impact. Ensuring consistency between these labels will minimise confusion and enhance consumer confidence in both systems.

3. Supporting Comprehensive Consumer Education

FSANZ should integrate the NIP and HSR into a cohesive consumer education campaign. This would enhance both trust in the labels and nutrition literacy, empowering consumers to make healthier choices based on a deeper understanding of the information provided by both labels.

Response to Question 6: Other Information or Evidence

1. Consumer Engagement and Trust in Labelling

Trust in food labelling systems, including the NIP and HSR, is essential for their effectiveness. However, consumer trust can be undermined by scepticism about industry motivations, inconsistencies in labels, and perceived discrepancies between label claims and consumer understanding. Previous research highlights that such distrust extends beyond labelling to the broader food system.^{24,25} Addressing these concerns is crucial, as government leadership is expected to ensure transparent, consistent labelling that consumers can trust. It is imperative for FSANZ to focus on strengthening this trust by

ensuring the NIP and HSR are reliable and align with consumer expectations and public health goals.

2. Consumer Research to Support NIP and HSR

FSANZ's commitment to conducting additional consumer research is commendable, but it is essential that not only new studies build on the existing evidence base, but the resulting evidence base leads to defined, actionable solutions. The research should focus on best practices from leading jurisdictions such as France and Mexico, where innovative nutrition labelling initiatives have been successfully implemented. Collaborating with these international leaders, as well as consulting with experts from FSANZ's advisory groups, will ensure that research remains rigorous and impactful. Moreover, consumer research should inform education campaigns designed to increase nutrition literacy, with consideration given to varying health literacy levels and diverse community needs.

3. Global Collaboration on Nutrition Labelling

Australia and France previously co-convened a global network on nutrition labelling under the WHO. Australia recommends that the Global Action Network on Nutrition Labelling be revitalised to ensure that Australia and New Zealand can benefit from the latest international insights on nutrition labelling. Leveraging global expertise will help improve the design and impact of the NIP and HSR in line with the best available evidence and innovations from other jurisdictions.

Conclusion

The focus on consumer trust in labelling systems is key to the success of any reforms to the NIP and the HSR system in Australia. By addressing consumer concerns about consistency, transparency, and alignment with public health goals, FSANZ can enhance both consumer confidence and label effectiveness. The proposed research collaboration with global experts and the revitalisation of international networks will further support the review process by incorporating diverse perspectives and best practices, ensuring that Australia and New Zealand remain at the forefront of nutrition labelling innovation. This approach will not only improve the NIP but also ensure that public health initiatives are grounded in robust, global evidence and consumer engagement. Furthermore, it will support government efforts to prevent the rise in obesity and diet-related chronic diseases, including cardiovascular disease, diabetes and some cancers.

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