

9 October 2020

Dear Front-of-Pack Labelling Secretariat,

Submission on the Draft Health Star Rating (HSR) Calculator and Style Guide

Thank you for the opportunity to provide a submission on the 'Draft Updated Health Star Rating Calculator and Style Guide'.

The Global Obesity Centre (GLOBE) seeks to make the following recommendations:

1. Fresh fruits and vegetables, including unpackaged, should explicitly be included in the definition to receive an automatic 5-star rating
2. Amend the layout for the definition '2a Products that must not use the Health Star Rating System'
3. Clarify products intended to use the HSR system with nutrient composition that varies
4. Recommend consistent application of HSR to all products across a food company's product range
5. Include additional categories in the HSR calculator list for categories with an automatic rating
6. Clarify the treatment of canned fruit in juice in the definition of minimally processed fruit
7. Refine the definition for calculation of fvnl points
8. Clarify the use of the HSR graphics, preferencing the use of the HSR icon on its own
9. Establish a minimum size for HSR graphics

We appreciate your consideration of our recommendations and hope you also see the value in incorporating them into the revised HSR calculator and style guide.

Please do not hesitate to contact us should you have any further queries.

Yours sincerely,



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About the Global Obesity Centre

The Global Obesity Centre (GLOBE) is a World Health Organization Collaborating Centre for Obesity Prevention, situated within the Institute for Health Transformation at Deakin University, Melbourne, Australia. Our vision is to catalyse improvements in population health, with a focus on obesity, through innovative research that empowers people and enables healthier environments.



Rationale for Recommendations

1. Fresh fruits and vegetables, including unpackaged, should explicitly be included in the definition to receive an automatic 5-star rating

GLOBE notes that, since the initial release of the draft style guide, the text noting specific exclusion of fresh fruits and vegetables from an automatic 5-star rating was removed. However, we would recommend this goes one step further to clarify and include mention of fresh fruits and vegetables in the definition of minimally processed fruits and vegetables. The HSR Style Guide does not reflect the Ministerial Forum decision to apply an automatic 5-star rating to all fresh and minimally processed fruit and vegetables. In its response to the five-year review, the Ministerial Forum said it supports ‘...the promotion of all unprocessed and minimally processed fruits and vegetables without differentiation’. In our view, the Ministerial Forum response suggests that unprocessed fruit and vegetables will also receive a 5-star rating along with these minimally processed fruit and vegetables, as defined.

The Guide correctly applies a 5-star rating to minimally processed fruit and vegetables, but the definition does not include whole or unprocessed fruit and vegetables. This must be amended to avoid consumer confusion and inconsistency that will undermine confidence in the system overall.

We also recommend that the wording of the minimally processed fruit and vegetable definition is rephrased as the current wording includes many elements and it is difficult to determine whether the definition will be met when only one of these elements applies.

A revised definition could say:

Fruit (except coconut), vegetables, fungi and legumes (except peanuts) that are unprocessed (including whole or unpackaged) or have only been processed in one or more of the following ways, and without the addition of fat, sugars/sweeteners or salt: peeled, cut, surface treated, blanched, frozen, canned.

The guide should also outline how the HSR should be displayed in a food retail area and/or at point of sale for unpackaged fruits and vegetables. For example, would it be permissible to display the HSR on a product’s price and information signage and/or more general signage in a retail environment. General signage to promote fresh fruits and vegetables were trialled in a 12-month healthy supermarket intervention by Cameron et al (1,2). The posters were displayed in the fresh produce section with the statement, “All fresh fruit and vegetables are a healthy choice” along with pictures of fresh fruits and vegetables and a 5 HSR symbol. The evaluation of the study found positive feedback from the supermarket retailer, with supermarkets maintaining the posters after the trial had ended. A survey from 500 customers indicated 55% noticed the posters, of which 36% believed it influenced their purchasing (20% of all surveyed customers).



2. Amend the layout for the definition '2a Products that must not use the Health Star Rating System'

The current format appears confusing for the eligibility of alcoholic beverages, alcohol kits, and kava as the note separates the list. Recommend indenting the note in line with the certain purpose foods to which it relates.

3. Clarify products intended to use the HSR system with nutrient composition that varies

We support the list of products that are intended to use the HSR system and note that this definition is linked to the uptake targets. For this reason, it is important that the products that are intended to use the HSR system are very clear. We agree with the exclusion of products that cannot vary in nutrient composition, as long as this is narrowly defined as set out in the consultation document detailing uptake targets. We support the further clarification around products intended to use the system in that document.

The definition of products that can vary in nutrient composition must be based on broad categories of food, not on smaller subcategories. For example, milk as a whole group rather than full fat milk. For clarity, we recommend that the guide include a list of products that are found to be unable to vary in nutrient composition.

4. Recommend consistent application of HSR to all products across a food company's product range

The draft style guide says on page 8: 'Use of the HSR system is voluntary; however, food companies that choose to adopt the HSR system are encouraged to do so consistently across their product range, and within product categories.'

We ask that this be strengthened to avoid the HSR being used as a promotional tool for higher rating products or product categories. We recommend that the reference to product categories be removed, as this implies that it is acceptable for manufacturers to apply the HSR only on higher rating categories, and not on others.

We recommend the sentence above be amended to read: 'Use of the HSR system is voluntary; however, food companies that choose to adopt the HSR system should do so consistently across their full product range.'

5. Include additional categories in the HSR calculator list for categories with an automatic rating

We recommend four categories be added to the HSR calculator list in line with the changes to how the HSR is calculated for 'water', 'unsweetened flavoured water', 'fresh, unprocessed fruits and vegetables', and 'minimally processed fruits and vegetables'. This would help make it clear when calculating the HSR that these products are treated differently and receive an automatic HSR that does not require the algorithm. We also recommend adding these categories to 'Figure 1 Categories of products in the HSR Calculator'. As it stands, with this information integrated into category 1 and category 2 descriptions, it is not immediately obvious that these products are excluded from the algorithm. Given the change in how their HSR is calculated, it no longer aligns that they be considered within the same category of foods that use the algorithm to calculate the HSR.



6. Clarify the treatment of canned fruit in juice in the definition of minimally processed fruit

The current definition of minimally processed fruit does not make it clear whether canned fruit in natural juice would be considered a sugar/sweetener. Canned fruit serves as a useful substitute when fresh fruit is not available. However, it provides an additional source of free sugars which should be reflected in its HSR and should not be permitted under the definition of minimally processed fruit.

7. Refine the definition for calculation of fvnl points

In line with the OPC submission, we highlight that this method of calculating fvnl points allows processed fruit and vegetable ingredients that we consider added sugar to receive points for fruit and vegetable content. These ingredients include fruit and vegetable paste, juice, juice concentrate and dried fruit. This essentially allows manufacturers to obtain fruit and vegetable points for putting added sugar in their food. This is not consistent with the Australian Dietary Guidelines.

We note that FSANZ is currently reviewing added sugar labelling, and as part of this work will develop a definition of added sugar. The HSR definition of fvnl must be updated to reflect this definition of added sugar, which is likely to include some of the elements given points under the HSR as a form of fruit and vegetables.

8. Clarify the use of the HSR graphics, preferencing the use of the HSR icon on its own

The style guide advises that 'Food and beverage companies are encouraged to use as many elements of the HSR system graphic as possible consistent with the hierarchy of elements' (page 8). We recommend this advice be removed from the guide. There is no evidence that displaying as many elements as possible is beneficial for consumers. We note that some elements of the HSR graphic, such as the energy icon, are not interpretive and have been shown to be of limited use to consumers.

We also recommend that the guide is amended to make it clearer to readers that, where a manufacturer chooses to use the HSR system on a particular product, the HSR graphic must always be used. This appears to be the overall intention of the guide, however wording in some parts is unclear. We recommend clauses 5.5, 5.5.1 and 5.1.2 include a statement advising that the energy and nutrient content icons can only be used together with the main HSR graphic.

9. Establish a minimum size for HSR graphics

The style guide advises that the HSR graphics can be scaled to fit the size of the pack as long as they remain legible. We argue that the style guide should include a minimum size requirement, and that this may vary in accordance with the size of the pack. Establishing a minimum size is important as the visibility of the HSR graphic to the consumer is likely to affect its impact. This should be reflected in the examples included, as currently the HSR graphics in Appendix 5 are not legible.



References

1. Cameron A, Sacks G, Brown A, Ngan W, Isaacs J. Customer and staff perceptions of a supermarket marketing intervention to promote healthy eating. Paper presented at: 15th World Congress on Public Health; 2017 Apr 3-7; Melbourne.
2. Cameron A, Brown A, Gamble G, Reimers J, Marshall J, Steele T, Orellana L, Ni Mhurchu C, Moodie M, Etile F, Swinburn B, Ananthapavan J, Blake M, Ngan W, Sacks G. Outcomes of a 12 month supermarket RCT to promote healthy eating. Paper presented at: PHAA Food Futures conference; 2018 Nov 20-21; Brisbane.