

## AUSTRALIAN CHRONIC DISEASE PREVENTION ALLIANCE



### **Engagement - Implementation of changes resulting from the Health Star Rating System Five Year Review**

June 2020

The Australian Chronic Disease Prevention Alliance welcomes the opportunity to comment on the implementation of changes resulting from the Five-Year Review of the Health Star Rating system.

The Australian Chronic Disease Prevention Alliance (ACDPA) is an alliance of Cancer Council Australia; Diabetes Australia; National Heart Foundation of Australia; Kidney Health Australia; and Stroke Foundation. Members work together to promote prevention, integrated risk assessment and effective management of chronic disease risk.

#### **Support for the system requires changes to sugar and sodium and increased uptake**

The Health Star Rating system is an important initiative to improve nutrition in Australia by providing easy-to-understand information for consumers about the healthiness of products. The Five-Year Review and its recommendations provide an opportunity for evidence-based improvements to the system.

As an alliance of public health organisations, ACDPA's support of the Health Star Rating (HSR) system requires significant changes to sugar and sodium in the algorithm to better align with the Dietary Guidelines and consumer expectations about the treatment of these risk nutrients in calculating star ratings.

Our support of the HSR system is also based on seeing an increase in the uptake of the system by manufacturers, so the star rating appears on an increasing range of products to guide healthier food choices. As it stands, the star system currently only appears on around one-third of products, which not only hinders the consumer's ability to compare products but equally undermines the overall intent of the system. We therefore support the need to ensure increasing uptake across products with interim targets, monitoring and accountability. The system needs to work for consumers, not just food companies.

#### **Support for Calculator 2 to improve sugar and sodium in the algorithm**

The proposed improvements to sugar and sodium in Calculator 2 address concerns around the existing treatment of these risk nutrients and are consistent with Ministerial interest to address these concerns and improve the accuracy of the system.

Australians consume too much sugar and salt in their everyday diets, with much of this coming from processed foods. These risk nutrients can contribute to disease and unhealthy weight gain, so it is essential that processed foods high in sugar and/or salt do not attract high star ratings or assume the appearance of being endorsed by the HSR system.

We strongly recommend Calculator 2 to better align with the Australian Dietary Guidelines and support consumer expectations about products high in sugar and/or salt. There have been consistent concerns around products receiving high star ratings despite high levels of sugar and/or salt. This includes discretionary foods and Five Food Group foods that have high sugar and/or salt content. Strengthening the treatment of these risk nutrients in the algorithm would provide an incentive for manufacturers to reformulate, irrespective of the type of product, and support consumers indirectly by providing healthier options in addition to better labelling.

#### **Support for changes to non-dairy beverages and removing the energy icon**

We reiterate our strong support for the recommendations from the Five-Year Review that have already been accepted by Ministers to improve the system's accuracy and enable the system to achieve its purpose. These are based on extensive consultation as part of the Five-Year Review and have already been endorsed by Ministers to strengthen the system.

We strongly support the agreed changes to non-dairy beverages to better align with the Dietary Guidelines, including to better reflect the nutritional profile of high sugar fruit juices. The treatment of high sugar fruit juices in the existing algorithm has been a concern for consumer and public health groups due to misalignment with dietary advice regarding limiting consumption of fruit juices. We strongly support the changes to non-dairy beverages to improve the algorithm and support consumer trust.

We strongly support the decision to remove the energy icon from the HSR graphic options, as it is poorly understood by consumers, inconsistently applied across products and it does not include an interpretive element, limiting its usefulness as part of the HSR system.

Both these changes have been supported by Ministers and we reiterate the importance of incorporating these changes into the system improvements as soon as possible to ensure the system works for consumers not just for manufacturers.

### **Support for October 2020 start date and targets to increase uptake**

We strongly support the October 2020 start date for the implementation. The system has been in operation since 2014 and, six years later, it still only appears on around one-third of eligible products.

The effects for this start date on industry are minimal, even with the advent of COVID-19, as the system is voluntary and operating only on a small proportion of products, with an even smaller proportion affected by calculator changes. The two-year transition period is a generous timeframe for industry for a system that is still voluntary.

We support clear interim targets, monitoring and accountability to ensure the proposed deadline is met and that high uptake (minimum 70 percent) is achieved across products as soon as possible to increase the effectiveness of the system. If targets are not being met, we support making the system mandatory to meet the objective to provide readily accessible information for consumers and improve nutrition at the population level.

### **Intent of the Health Star Rating system**

Finally, we highlight that the overarching purpose of the system is to provide information for consumers about the healthiness of products and ultimately improve nutrition. A further benefit is the reformulation of products following changes to the algorithm to achieve higher star ratings (including for Five Food Group foods that are high in sugar and/or salt).

We strongly highlight that changes to the HSR system should be based on public health evidence to better align with the Australian Dietary Guidelines and build consumer trust, and highlight the importance of increasing uptake so that the system appears on more products to support consumer decision making.

#### *About chronic disease*

Chronic diseases are the leading cause of premature death in Australia. One in two Australians have a chronic disease, and one in four Australians have multiple conditions. Overweight and obesity is a major risk factor shared by heart disease, diabetes, stroke, kidney disease and certain cancers. 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 nutrition and generate health benefits.

*Please note that input from the Heart Foundation to this ACDPA response has been limited to feedback on technical aspects of the system.*