

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

- Stakeholder Engagement –

- May 2020 -

The Australia and New Zealand Ministerial Forum on Food Regulation (Forum) considered the *Health Star Rating System Five Year Review Report* (Review Report) and the Report's ten recommendations for enhancing the Health Star Rating (HSR) system in November 2019. The Forum published its Response to the Review Report in December 2019.

The Forum requested that the Food Regulation Standing Committee (FRSC) provide further advice on several recommendations and develop an Implementation Plan for changes to the HSR system. FRSC is keen to keep key stakeholders informed of progress.

At the Forum meeting in November 2019, the Forum supported some recommendations in-full (Recs 1, 2, 6, 10), supported some recommendations subject to funding (Recs 3, 7, 8), and, some in-principle subject to additional modelling or definitions from FRSC and Food Standards Australia New Zealand (FSANZ) (Recs 4a-e, 5, 9). In addition to the changes that were agreed in-principle in November 2019, the Forum asked FRSC to consider whether:

- a stronger approach for total sugars (30 point scale) may achieve an outcome that more closely aligns the HSR system with Dietary Guidelines;
- the alternative approach considered in the draft review report for the scaling of sodium achieves an outcome that more closely aligns the HSR system with Dietary Guidelines;
- dairy re-categorisation is the most appropriate approach when combined with other enhancements; and
- it is appropriate and/or necessary to rescale whole categories in combination with the proposed adjustments to individual nutrients (i.e. sugar and sodium).

The Forum asked FSANZ to undertake further modelling to provide advice on the 30 point sugar table, the alternative sodium approach and the re-categorisation and rescaling of dairy with other changes.

A key consideration for the Implementation Plan is the start date, noting that a two-year transition will apply. In the interest of collaboration and transparency, FRSC is inviting feedback on the proposed start date of 1 October 2020. In considering the appropriateness of the implementation start date, stakeholders should note that:

- A two-year transition period will apply (i.e. changes do not need to be implemented immediately, but rather by 30 September 2022);
- The system is voluntary and there is no requirement to adopt Health Star Ratings during the implementation period;
- FRSC is not proposing to measure uptake until the end of year three (i.e. 30 September 2023); and
- The Forum has agreed in-principle to an uptake target of 70% after five years (i.e. 2025), subject to agreeing interim and final target metrics.

FRSC is seeking feedback only on the impact of the proposed start date of the implementation period. We request that you provide advice on your ability either to implement (food industry stakeholders) or support implementation of (public health, consumer and government stakeholders) a revised HSR system from 1 October 2020, with a two year transition period, by way of providing a response to the question below.

Question

Noting the voluntary nature of the system, does a start date for implementation of October 1, 2020 have any implications for you given:

- i. the modifications (resulting from recommendations agreed in-principle) outlined in the attached information? *Please refer to Calculator 1.*
- ii. the additional modifications outlined in the attached information? *Please refer to Calculator 2.*
- iii. the context of the COVID-19 pandemic?

Please describe the nature of any impacts.

Additional information that may assist stakeholders in their consideration of the appropriateness of the start date can be found on the following pages.

HSR Five-year review system changes

Calculators

Provided alongside this paper are two calculators:

- Calculator 1: includes relevant changes recommended in the Review Report.
- Calculator 2: includes relevant changes recommended in the Review Report and further considerations requested by Ministers in 2019.

Further detail on the changes incorporated into each calculator is provided below.

Calculator 1: HSR system changes as per Review Recommendations

1. Recommendation 2: The HSR energy icon only display option will no longer be valid – *the HSR energy only icon will need to be removed from any products displaying it and (subject to the decision of the relevant business) the HSRs for products previously displaying the HSR energy only icon will need to be determined using the relevant calculation method in the Calculator and an alternative HSR graphic will need to be selected to replace the energy icon only graphic.*
2. Recommendation 4a: Packaged minimally processed fruits and vegetables that apply a HSR no longer need to determine the HSR via the HSR Calculator. They automatically receive an HSR of 5. FRSC are proposing the following definition for minimally processed fruits and vegetable eligible for the automatic 5 star rating:
Fruit (excluding coconut), vegetables, fungi and legumes (except peanuts) that have only been peeled, cut and/or surface treated, blanched and/or frozen or canned without the addition of fat, sugars, sweeteners or salt¹.
3. Recommendation 4b: The penalisation for total sugars has been strengthened by extending the baseline points for products in Categories 1D, 2 and 2D from a maximum of 22 points to a maximum of 25 points for >99g sugar per 100g. *Details provided in Table 1 below.*
4. Recommendation 4c: Sodium sensitivity has been improved for products high in sodium. Specifically, the upper limit of the sodium table for Categories 1D, 2 and 2D has been reduced from a maximum of 30 baseline points for sodium content > 8,106mg/100g to a maximum of 30 baseline points for sodium content >2,700mg/100g. *Details provided in Table 1 below.*
5. Recommendation 4d: Categories 2D and 3D have been rescaled, and a number of defined products previously categorised as Category 2 foods have been re-categorised so as to now be Category 2D dairy foods. *Details provided in Tables 6 and 7 below.*
6. Recommendation 4e: Jellies and water based iced confections are now categorised at Category 1: non-dairy beverages - such products need to use the new calculation method (detailed below).
7. Recommendation 5: The calculation method for non-dairy beverages (other than water and unsweetened flavoured water) has been amended. *Details provided in Table 5 below.*
8. Recommendation 5: Unsweetened flavoured water products that apply a HSR no longer need to determine the HSR via the HSR Calculator. They automatically receive a HSR of 4.5. FRSC are proposing the following definition for unsweetened flavoured waters eligible for the automatic 4.5 star rating:
Packaged beverages similar in nutritional profile to water that: may contain carbon dioxide, whether added or naturally occurring; and contains no added sugars, sweeteners or salt; and contains only the following additives: permitted flavouring substances, excluding quinine and caffeine, at GMP².

¹ Draft definition being proposed to the Forum

² Draft definition being proposed to the Forum

Calculator 2: HSR system changes as per Review Recommendations AND changes resulting from additional work requested by the Forum

1. Recommendations 2, 4a, 4d, 4e and 5 – as detailed above.
2. Alternative to Recommendation 4b: The penalisation for total sugars has been strengthened by extending the baseline points for products in Categories 1D, 2 and 2D from a maximum of 22 points to a maximum of 30 points for >99g sugar per 100g. *Details provided in Table 3 below.*
3. Alternative to Recommendation 4c: The upper limit of the sodium table for Categories 1D, 2, 2D, 3 and 3D has been reduced from a maximum of 30 baseline points for sodium content > 8,106mg/100g to a maximum of 30 baseline points for sodium content >2,2500mg/100g, and the increments between points has been reduced to 75mg. *Details provided in Tables 3 and 4 below.*

Table 1: HSR Baseline Points for Category 1D Beverages, 2 or 2D Foods, as per Review Recommendations

HSR baseline points	Average energy content (kJ) per 100 g or 100 mL	Average saturated fatty acids (g) per 100 g or 100 mL	Average total sugars (g) per 100 g or 100 mL	Average sodium (mg) per 100 g or 100 mL
0	≤335	≤1.0	≤5.00	≤90
1	>335	>1.0	>5.0	>90
2	>670	>2.0	>8.9	>180
3	>1005	>3.0	>12.8	>270
4	>1340	>4.0	>16.8	>360
5	>1675	>5.0	>20.7	>450
6	>2010	>6.0	>24.6	>540
7	>2345	>7.0	>28.5	>630
8	>2680	>8.0	>32.4	>720
9	>3015	>9.0	>36.3	>810
10	>3350	>10.0	>40.3	>900
11	>3685	>11.2	>44.2	>990
12		>12.5	>48.1	>1080
13		>13.9	>52.0	>1170
14		>15.5	>55.9	>1260
15		>17.3	>59.8	>1350
16		>19.3	>63.8	>1440
17		>21.6	>67.7	>1530
18		>24.1	>71.6	>1620
19		>26.9	>75.5	>1710
20		>30.0	>79.4	>1800
21		>33.5	>83.3	>1890
22		>37.4	>87.3	>1980
23		>41.7	>91.2	>2070
24		>46.6	>95.1	>2160
25		>52.0	>99.0	>2250
26		>58.0		>2340
27		>64.7		>2430
28		>72.3		>2520
29		>80.6		>2610
30		>90.0		>2700

Table 2: HSR Baseline Points for Category 3 or 3D Foods, unchanged as a result of Review

Recommendations

HSR baseline points	Average energy content (kJ) per 100 g or 100 mL	Average saturated fatty acids (g) per 100 g or 100 mL	Average total sugars (g) per 100 g or 100 mL	Average sodium (mg) per 100 g or 100 mL
0	≤335	≤0	≤5.0	≤90
1	>335	>1.0	>5.0	>90
2	>670	>2.0	>9.0	>180
3	>1005	>3.0	>13.5	>270
4	>1340	>4.0	>18.0	>360
5	>1675	>5.0	>22.5	>450
6	>2010	>6.0	>27.0	>540
7	>2345	>7.0	>31.0	>630
8	>2680	>8.0	>36.0	>720
9	>3015	>9.0	>40.0	>810
10	>3350	>10.0	>45.0	>900
11	>3685	>11.0		>990
12		>12.0		>1080
13		>13.0		>1170
14		>14.0		>1260
15		>15.0		>1350
16		>16.0		>1440
17		>17.0		>1530
18		>18.0		>1620
19		>19.0		>1710
20		>20.0		>1800
21		>21.0		>1890
22		>22.0		>1980
23		>23.0		>2070
24		>24.0		>2160
25		>25.0		>2250
26		>26.0		>2340
27		>27.0		>2430
28		>28.0		>2520
29		>29.0		>2610
30		>30.0		>2700

Table 3: HSR Baseline Points for Category 1D Beverages, 2 or 2D Foods – stronger penalty for total sugars and sodium

HSR baseline points	Average energy content (kJ) per 100 g or 100 mL	Average saturated fatty acids (g) per 100 g or 100 mL	Average total sugars (g) per 100 g or 100 mL	Average sodium (mg) per 100 g or 100 mL
0	≤335	≤0	≤5.00	≤75
1	>335	>1.0	>5.0	>75
2	>670	>2.0	>8.3	>150
3	>1005	>3.0	>11.5	>225
4	>1340	>4.0	>14.7	>300
5	>1675	>5.0	>18.0	>375
6	>2010	>6.0	>21.2	>450
7	>2345	>7.0	>24.5	>525
8	>2680	>8.0	>27.7	>600
9	>3015	>9.0	>30.9	>675
10	>3350	>10.0	>34.2	>750
11	>3685	>11.2	>37.4	>825
12		>12.5	>40.7	>900
13		>13.9	>43.9	>975
14		>15.5	>47.1	>1050
15		>17.3	>50.4	>1125
16		>19.3	>53.6	>1200
17		>21.6	>56.9	>1275
18		>24.1	>60.1	>1350
19		>26.9	>63.4	>1425
20		>30.0	>66.6	>1500
21		>33.5	>69.8	>1575
22		>37.4	>73.1	>1650
23		>41.7	>76.3	>1725
24		>46.6	>79.6	>1800
25		>52.0	>82.8	>1875
26		>58.0	>86.0	>1950
27		>64.7	>89.3	>2025
28		>72.3	>92.5	>2100
29		>80.6	>95.8	>2175
30		>90.0	>99.0	>2250

Table 4: HSR Baseline Points for Category 3 or 3D Foods – stronger penalty for sodium

HSR baseline points	Average energy content (kJ) per 100 g or 100 mL	Average saturated fatty acids (g) per 100 g or 100 mL	Average total sugars (g) per 100 g or 100 mL	Average sodium (mg) per 100 g or 100 mL
0	≤335	≤0	≤5.0	≤75
1	>335	>1.0	>5.0	>75
2	>670	>2.0	>9.0	>150
3	>1005	>3.0	>13.5	>225
4	>1340	>4.0	>18.0	>300
5	>1675	>5.0	>22.5	>375
6	>2010	>6.0	>27.0	>450
7	>2345	>7.0	>31.0	>525
8	>2680	>8.0	>36.0	>600
9	>3015	>9.0	>40.0	>675
10	>3350	>10.0	>45.0	>750
11	>3685	>11.0		>825
12		>12.0		>900
13		>13.0		>975
14		>14.0		>1050
15		>15.0		>1125
16		>16.0		>1200
17		>17.0		>1275
18		>18.0		>1350
19		>19.0		>1425
20		>20.0		>1500
21		>21.0		>1575
22		>22.0		>1650
23		>23.0		>1725
24		>24.0		>1800
25		>25.0		>1875
26		>26.0		>1950
27		>27.0		>2025
28		>28.0		>2100
29		>29.0		>2175
30		>30.0		>2250

Table 5: HSR Baseline and Modifying Points for Category 1 Beverages (non-dairy)

HSR baseline points	Average energy content (kJ) per 100 mL	Average total sugars content (g) per 100 mL	HSR modifying points	Fruit and Vegetable content (%)
0	≤1.1	≤0.1	0	<25
1	>1.1	>0.1	1	≥25
2	>31	>1.6	2	≥33
3	>61	>3.1	3	≥41
4	>91	>4.6	4	≥49
5	>121	>6.1	5	≥57
6	>151	>7.6	6	≥65
7	>181	>9.1	7	≥73
8	>211	>10.6	8	≥81
9	>241	>12.1	9	≥89
10	>271	>13.6	10	≥96

Table 6: Assignment of a rating to product based on the final HSR score

Health Star Rating	Category 1 Non-Dairy Beverages	Category 1D Dairy Beverages	Category 2 Non-dairy Foods	Category 2D Dairy Foods	Category 3 Oils and Spreads	Category 3D Cheese with calcium content >320mg/100g
5	Water	≤ -2	≤ -11	≤ -2	≤ 13	≤ 24
4 ½	Flavoured water	-1	-10 – -7	-1 – 0	14 – 16	25 – 26
4	0	0	-6 – -2	1 – 2	17 – 20	27 – 28
3 ½	1	1	-1 – 2	3	21 – 23	29 – 30
3	2 – 3	2	3 – 6	4 – 5	24 – 27	31
2 ½	4 – 5	3	7 – 11	6 – 7	28 – 30	32 – 33
2	6 – 7	4	12 – 15	8	31 – 34	34 – 35
1 ½	8 – 9	5	16 – 20	9 – 10	35 – 37	36 – 37
1	10 – 11	6	21 – 24	11 – 12	38 – 41	38 – 39
½	≥12	≥ 7	≥25	≥13	≥42	≥40

Table 7: HSR Category 2 - redefined

Category 2D to include all ‘spoonable’ dairy foods that contain ≥75% dairy ingredients.
Including: yoghurts, custards, evaporated milks, dairy-based desserts (mousses, crème caramels, panna cottas) cream cheeses, creams, sour creams, crème fraiche and mascarpone.
Excluding: ice creams, gelatos and other dairy-based ice confections and condensed milks.