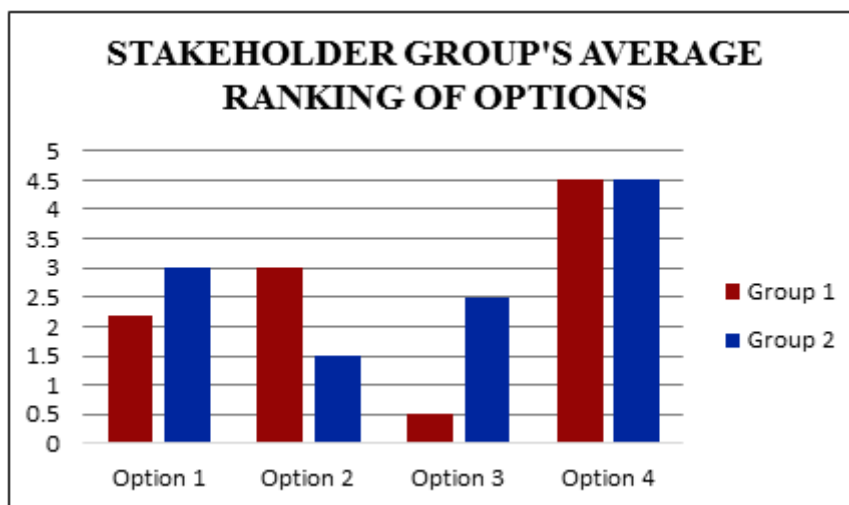


HEALTH STAR RATING 'AS PREPARED' STAKEHOLDER WORKSHOP

Auckland 5 October 2017

Industry, Public Health, Government and Consumer Stakeholders (Attendees: 12)

Stakeholders were given an overview of the objectives of the Health Star Rating (HSR) system and the current rules for the form of the food ('as prepared' rules) to be used in calculating the HSR. A discussion paper outlining the issues was provided to participants prior to the workshop. Participants were then asked to consider four options for the 'as prepared' rules as detailed in the discussion paper: 1) status quo, 2) 'as sold' only, 3) multiple HSRs on pack and 4) 'as sold' with exemptions. The attendees were split into two groups with an even distribution of industry, public health, government and consumer stakeholders in each group. Attendees were asked to consider the pros and cons of each option and assign an overall star rating based on how successful they considered each option would be. The individual groups then provided feedback and each option was discussed as a larger group.



Key messages

The outcomes of the workshop are not a consensus statement. The 'messages' described below reflect the main themes and views of attendees in general. Overall there was good, robust discussion and stakeholders worked together to find a 'best fit' solution.

- There was a strong preference for option four ('as sold' with exemptions) in both groups. Stakeholders expressed that in order for this option to be successful there would need to be a limited number of exemptions and that the rules for these need to be very clear.
 - Consensus was reached that products that are required to be rehydrated or diluted with water only be exempt from applying the HSR 'as sold'.

- There was strong agreement to exempt products that need to be drained prior to consumption but only for certain categories e.g. canned vegetables, canned pulses.
- There was some agreement that products that are able to score health stars on their own should not be allowed to contribute to another products ‘as prepared’ HSR.
- There were mixed views on the other options but none of these were seen as particularly viable solutions.
- Whatever option is selected, clear and detailed guidance is necessary to prevent differences in interpretation and to ensure consistent application within categories.
- Stakeholders acknowledged the importance of being consistent with the Food Standards Code, with special consideration of Formulated Supplementary Foods (Standard 2.9.3) potentially required.
- Stakeholders acknowledged that it would be unlikely to find a solution that would solve all irregularities but emphasis should be put on finding a solution for products that are consumed in large amounts, have a big impact on health, or gain a lot of media attention.
- Stakeholders identified a need for consumer research on the understanding consumers have of ‘as prepared’ in relation to the HSR. Additionally, the ‘as prepared’ rules need further explanation to all stakeholders, including consumers.

Pros and cons of each option

Option one - Status quo	
Pros	Cons
<ul style="list-style-type: none"> ● No change to packaging ● No expense ● Consistency with Food Standards Code ● Allows for variation in the way products are made up ● Practical for the consumer ● Aids consumers to make meals in line with dietary guidelines e.g. adding fruit and vegetables ● Avoids complicating the system further ● Element of confidence and trust already 	<ul style="list-style-type: none"> ● Different application by different companies e.g. within categories some companies use ‘as sold’ while others use ‘as prepared’. Can’t make a comparison between products within the category. ● Ambiguous- open to different interpretations (leading to the above) ● Confusion/ difficulty applying the ‘as prepared’ rules by industry ● Confusion for consumers ● Mistrust by consumers and media ● Continued criticism of the HSR and of the process ● Potentially misleading if consumer doesn’t prepare product as per instruction ● May not drive reformulation as can manipulate recipe instead to improve HSR ● Allows precedent setting- problem grows ● Gives industry the option to ‘creatively market’ products based on recipes ● Current problem will be unresolved

Option one - Status quo
<p>Comments:</p> <ul style="list-style-type: none"> • Make ‘as prepared’ HSRs a different colour to ‘as sold’ so it can easily be differentiated by consumers OR state ‘as prepared’ on the HSR to make it clear • Need guidelines on use as currently there is too much ambiguity • Need consumer research to know how consumers understand HSR ‘as prepared’

Option two – ‘As sold’ only	
Pro	Con
<ul style="list-style-type: none"> • Consistent application (by industry) within category • Remove confusion (for industry) • Remove criticism around particular products • Greater consistency with other categories that are not using ‘as prepared’ • Simple • Reformulation easier to see and would possibly encourage reformulation 	<ul style="list-style-type: none"> • Difficult to compare different forms of the product within category (e.g. stock powder with liquid stock) • Doesn’t give information on ‘as consumed’ - less meaningful to consumers • Doesn’t assist outcome of what HSR is trying to achieve • Inconsistent with the Food Standards Code • May discourage industry from putting preparation instructions that align with dietary guidance • Possibly discourage industry uptake if not able to display HSR ‘as prepared’

Option three - Multiple HSRs on pack	
Pro	Con
<ul style="list-style-type: none"> • Could be beneficial to have ‘as sold’ on the front and on the back have ‘as prepared’ by the recipe (although some commented that this is not necessarily a pro) • Enables greater flexibility which may encourage industry uptake • May encourage dietary guidelines statements on pack (i.e. in preparation instructions) 	<ul style="list-style-type: none"> • Extra confusion • Lose credibility with different stars • Hard to fit on the packaging • May be a waste of time, will people look at the additional information? (have to turn pack over) • Problem with HSR’s on the back of pack is that it is a front of pack labelling system
<p>Comments:</p> <ul style="list-style-type: none"> • An alternative suggestion was to have the HSR ‘as prepared’ on the front of pack and ‘as sold’ on the back of pack OR ‘as prepared’ HSR with a graphic about what is added to obtain this rating (e.g. cup or milk or vegetables) • Consumer research would be important to determine if this option is viable 	

Option Four - 'As sold' with specific exemptions	
Pro	Con
<ul style="list-style-type: none"> • Creates change but provides flexibility • Allows comparisons as how they would be consumed • Improvement on option one (doing nothing) • Aligns with regulations (depending on exemptions) 	<ul style="list-style-type: none"> • If there are any exemptions it opens it up to criticism again • Confusion with what products can have exemptions
<p>Comments:</p> <ul style="list-style-type: none"> • Needs to come with clear detailed guidance • Possibly a different colour or design for 'as prepared'? Although colour was seen as less viable) • Consideration of special purpose foods that fall under std. 2.9.3 	
<p>Specific exemptions</p> <ul style="list-style-type: none"> • Exemptions should be limited and be very clear • Drained- but only if consumers normally drain to use - only canned vegetables, pulses and possibly fish (depending on whether in flavoured oil or brine (brine= as drained)). • Rehydrated or diluted with water only • Need to consider cake mix, 'as sold' may lead to a high HSR depending on what other ingredients need to be added (e.g. butter/oil, sugar, milk). However stakeholders expressed that it would be unlikely to find a solution that fixed all irregularities and need to consider what are the irregularities we can 'live with' • Discussion around 'mixed foods' and whether foods who have a HSR in their own right can contribute to the HSR of a food when prepared 	

Additional comments

- HSR could be limited to 'ready to eat' items only (i.e. where no other ingredients are added) - this will require clear definitions. This would significantly reduce the number of foods HSR could be applied to.