

HEALTH STAR RATING STAKEHOLDER WORKSHOPS SYDNEY / MELBOURNE / PERTH 2014

| Question | Response |
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| <p>The fats/oils category requires an in-depth review as current criteria determines that the Health Star Rating system rates products in a way that does not align with Australian Dietary Guidelines.</p> | <p>The treatment of fats/oils by the Health Star Rating Calculator was considered as part of its development, including taking into account industry feedback. It was determined that the calculator was producing technically accurate results in accordance with the scope and intended purpose of the Health Star Rating system (i.e. in addressing obesity and diet related chronic disease).</p> <p>Advice has also been sought from the National Health and Medical Research Council (NHMRC) who were responsible for the development of the <i>2013 Australian Dietary Guidelines</i>. The NHMRC has advised that in its view, the current HSR algorithm for fats and oils is consistent with the <i>2013 Australian Dietary Guidelines</i>, and the underpinning evidence base.</p> |
| <p>Can you please provide an approximate date when the new calculator and style guide will be made available, as we are to start internal training of the Health Star Rating as soon as possible?</p> | <p>The new Health Star Rating Website was launched on 6 December 2014. The current versions of the Health Star Rating Style Guide and Calculator can be found on the <i>Health Star Rating website</i>.</p> |
| <p>When will the templates for Health Star Rating graphics be made available to industry?</p> | <p>Artwork for the Health Star Rating system graphic is available on the Health Star Rating website.</p> |
| <p>I understand that funding has only been set for 2 years – what happens after that given it's a 5 year implementation period?</p> | <p>Implementation of the Health Star Rating system (including the development and implementation of an education campaign) is jointly funded by the Commonwealth, States and Territories and in part by New Zealand. Further funding is being considered by the Front-of-Pack Labelling Steering Committee.</p> |

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| <p>I would be interested in knowing New Zealand's involvement in the system is and whether this will roll out at the same time.</p> | <p>On 27 June 2014 the former Minister for Food Safety, Nikki Kaye, announced that the New Zealand Government will be joining with Australia's (voluntary) Front of Pack Labelling system.</p> <p>Since then, several New Zealand companies have publicly announced their intention to implement the system and products that carry the HSR label are already appearing on New Zealand shelves.</p> <p>A separate social marketing campaign is being developed for roll out in New Zealand in 2015.</p> |
| <p>Will there be a governing body that will randomly monitor products? How do we know if the star rating is correct?</p> | <p>The Health Star Rating Advisory Committee (made up of government, public health/consumer, and industry representatives) is responsible for overseeing the monitoring and evaluation of the Health Star Rating system and providing advice to the Front of Pack Labelling Steering Committee on related matters. The Health Star Rating Advisory Committee will conduct monitoring under several areas of enquiry. One of these areas will be "label implementation and consistency with the Health Star Rating system Style Guide".</p> <p>A process for dispute resolution is being developed by the Health Star Rating Advisory Committee and industry and individuals will be able to use this process if they believe that any Health Star Rating is incorrect or misleading.</p> |
| <p>Is there a flow chart / clearance tree for the anomalies process?</p> | <p>A process to assess potential anomalies within the Health Star Rating Calculator is available on the Health Star Rating website.</p> |
| <p>Has the Health Star Rating system been presented to retailers?</p> | <p>Retailers were involved in the development of the Health Star Rating system and are currently represented on the Health Star Rating Advisory Committee.</p> <p>Workshops held in late 2014 in Sydney, Melbourne, and Perth were also open to manufacturers and retailers. Retailers were also included in consultations during the development of the system.</p> |
| <p>Are there plans for retailers to join the push for suppliers to implement?</p> | <p>The Health Star Rating system is a voluntary system.</p> |

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| <p>With the kids' lunchbox green, amber or red rating already on products, do you see an eventual merging of the two ratings or will they remain separate?</p> | <p>There is no intention to merge the Health Star Rating system with any other labelling system. However as specified in the Health Star Rating Style Guide, the Health Star Rating system label may be used in conjunction with other front-of-pack labelling systems.</p> <p>Where the Health Star Rating system graphic and other labels are used on the same pack they should be placed so that they do not lead consumers to believe that they are linked or are two parts of a single system.</p> |
| <p>Why is it voluntary?</p> | <p>Different implementation frameworks were considered during the development of the Health Star Rating system. At its July 2013 meeting, Members of the Forum agreed that the preferred implementation option for a front-of-pack labelling system in Australia is a voluntary system.</p> |
| <p>I think the timeline is too short for suppliers to implement. It could result in significant packaging write-offs. I would recommend delaying advertising and implementation until mid-2015 at the earliest to give suppliers time to implement without significant cost pressures.</p> | <p>In June 2013, the Australia and New Zealand Ministerial Forum on Food Regulation (the Forum) agreed that the Health Star Rating system be voluntarily implemented over two years.</p> <p>However, in June 2014, the Forum considered two new reports - a cost benefit analysis prepared by PricewaterhouseCoopers which explores the cost borne by industry, governments and non-government organisations and the potential benefits to public health with the voluntary introduction of the Health Star Rating; and an independent qualitative study by the Centre for International Economics on the impact of the Health Star Rating system on small business.</p> <p>In light of the research presented and the significant goodwill and genuine collaboration amongst many stakeholders, the Forum agreed that the Health Star Rating system should be implemented voluntarily over five years with a review of the progress of implementation after two years.</p> <p>The implementation time-frame has been extended to enable: cost effective implementation by industry; food reformulation; and consultation with small and medium sized enterprises.</p> |

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| <p>Whole fruit and vegetables are included in the ‘exemptions’ however if requested by a retailer to label pre-packed fruit and vegetables with the Health Star Rating, is this permitted?</p> | <p>The Health Star Rating system has been optimised for application to packaged food products, rather than fresh produce. However, as it is being implemented as a voluntary system, providing that the Health Star Rating is calculated correctly, there is nothing that would prevent pre-packed fruit and vegetables from being labelled with a Health Star Rating.</p> |
| <p>Will industry be informed of any changes made to the Health Star Rating Style Guide and Health Star Rating Calculator.</p> | <p>Any changes made to the guiding documents such as the Guide for Industry to the Health Star Rating Calculator, the Health Star Rating Calculator itself or the Health Star Rating Style Guide will be noted in the document itself, made available on the Health Star Rating website.</p> <p>Interested stakeholders that have provided their contact details to the Front-of-Pack Labelling Secretariat will also be contacted via email to alert them to the change.</p> |
| <p>Regarding the media campaign, would the following be considered as an avenue to spread the message: FoodSwitch (The George Institute); GS1 (current aps in place like go-scan)?</p> | <p>The Health Star Rating website includes stakeholder kits that provide information to assist with the delivery of communications to their networks and ensure consistency of messaging about the Health Star Rating system. These kits include:</p> <ul style="list-style-type: none"> • Key Health Star Rating system messages; • Editorial for newsletters, websites, etc; • Campaign material and ‘basket’ mnemonic; • Content for social media; and • Frequently asked questions. <p>Organisations (including those which operate FoodSwitch or GS1) may choose to incorporate this information into their own materials.</p> |

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| <p>Were applicants aware when making submissions on anomalies to the Health Star Rating Advisory Committee that they would be publicly available on the website?</p> | <p>The process to assess potential anomalies within the Health Star Rating Calculator is available on the Health Star Rating website.</p> <p>Included in the process document is a reference to the fact that de-identified details pertaining to submissions (including a summary of the submission and the Health Star Rating Advisory Committee's consideration) will be published on a register on the Health Star Rating webpage.</p> |
| <p>The education campaign completely ignores nutrient icons and those products using energy icon only. There doesn't seem to be the budget to address this if it becomes clear that consumers require this.</p> | <p>The campaign materials have been focus tested and refined based on this testing. Materials were initially tested with the star rating and energy icon, however consumers found this more confusing than stars only. As the Health Star Rating itself is the new information being introduced to packs (consumers already see nutrient information on packs in the Nutrition Information Panel and the Daily Intake Guide), it was decided to focus on this in digital, print and out-of-home materials.</p> <p>Information about other components of the Health Star Rating system (such as the nutrient icons) is provided on the Health Star Rating website as well as information about total diet.</p> |
| <p>Wasn't the Health Star Rating Calculator set up to ensure that core foods score >2 ½ stars in each category – can this be clarified please?</p> | <p>There is no minimum star rating for any category under the Health Star Rating system.</p> <p>Each of the six Health Star Rating Calculator categories are centered (albeit to a different point), but there will be products that are lower than the centre point. There is the potential for the full 1/2 to 5 star range to be covered in each category based on the individual nutritional composition of the range of products within the category.</p> |
| <p>When will the Health Star Rating Calculator be reviewed? Will this occur regularly? Will it be in line with the review of the dietary guidelines?</p> | <p>There is currently no timeline for a review of the Health Star Rating Calculator itself, however its operation is monitored by the Health Star Rating Advisory Committee as part of the anomalies process.</p> |

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| <p>When choosing a product from two brands, where one brand has natural ingredients (e.g. flavours etc) used and the other brand uses artificial ingredients and had a better Nutrition Information Panel than the brand that used natural ingredients – wouldn't this rating be misleading to the consumer?</p> <p>Even within the same brand e.g. you are choosing normal coke vs diet coke, the Nutrition Information Panel for diet coke would be better than normal coke and reflect a better rating. But the Aspartame used is actually dangerous to health. How can this be handled?</p> | <p>Notwithstanding the contribution that food makes to health, there are many food components and interactions between these components that affect overall health and it was determined early during the development of the Health Star Rating system that no one system could validly consider all of these components and interactions across all products in the food supply.</p> <p>Accordingly, it was determined by the committees overseeing the development of the system that the methodology used to generate the star ratings should: highlight nutrients (such as saturated fat, sodium and kilojoules) that contribute to poor population health outcomes, and support, and recognise industry initiatives to reduce risk associated nutrients (saturated fat, sugar and sodium) in the food supply.</p> <p>Attributes such as natural vs synthetic ingredients, are out in scope for this specific system. This is not to say that the Health Star Rating Advisory Committee is discounting the role that the attributes can play in contributing to health, but rather that they are not a necessary consideration within a system that assesses very specific risk nutrients and total energy.</p> <p>There are other opportunities on the food label for these factors to be noted, or promoted, within the permits of the Australia and New Zealand Food Standards Code.</p> <p>The Health Star Rating Advisory Committee is confident that the Health Star Rating system and the results produced by the Health Star Rating Calculator both support the intent of: reducing population intake of risk associated nutrients, and the 2013 Australian Dietary Guidelines (and specifically the recommendation that consumers “Limit intake of foods containing saturated fat, added salt, added sugars and alcohol”).</p> |

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| <p>Can you please advise the colour palette for the diagram to be used in the advertising?</p> | <p>The presentation of the Health Star Rating System graphic on food product packaging and labelling must comply with <i>Standard 1.2.9 - Legibility Requirements</i> of the <i>Australia New Zealand Food Standards Code</i> (the <i>Code</i>) and should be presented with contrasting background and text to maximise legibility.</p> <p>Due to the different printing capacities and colour palettes used by manufacturers, no further specifications have been made.</p> |
| <p>Suggest that the communication strategy includes recommendation to consume fresh fruit, vegetables, meat/fish, whole grains and non-packaged foods first and then packaged 5 star products.</p> | <p>The Health Star Rating website includes information about total diet, and links to the Australian Dietary Guidelines and Eat for Health website, which provide information about the importance of consuming whole-food products from each of the core food groups.</p> |
| <p>Can you please clarify how the campaign messages will assist consumers to compare like foods rather than foods in general?</p> | <p>The Health Star Rating campaign will raise consumers' awareness and understanding of the Health Star Rating system. Campaign messages will help to emphasise that Health Star Rating is best used to compare similar packaged foods – a message that is visually reinforced by campaign materials that show the active comparison of similar products (such as breakfast cereal). Campaign materials are available on the Health Star Rating website.</p> |
| <p>When will this become mandatory?</p> | <p>There are currently no plans for the Health Star Rating system to become mandatory. The Australia and New Zealand Ministerial Forum on Food Regulation has agreed that the system will be voluntary for five years (from June 2014), with a review of implementation after two years.</p> |
| <p>Is this for retail packaging only?</p> | <p>The Health Star Rating System has been optimised for application to packaged food products presented for retail sale through supermarkets and similar retail outlets.</p> |

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| Will it be recognised internationally? | The Health Star Rating is being implemented in Australia and New Zealand. There may be interest in the system from other countries. “Recognition” of the Health Star Rating system would be a matter for consideration by those countries. |
| Due to fluctuations of ingredient specs, some of our Nutrition Information Panel results vary. Will the Health Star Rating system accept some variance? | The Health Star Rating should correspond with the values presented in the Nutrition Information Panel. Where seasonal variation is accommodated within the Nutrition Information Panel, the Health Star Rating will remain unchanged. Where seasonal variation is not accommodated within the Nutrition Information Panel, and a change in the values within the Nutrition Information Panel is required, the Health Star Rating will need to be recalculated. |
| Have processed foods been taken into consideration when calculating the Health Star Rating? | The Health Star Rating system was designed primarily for use on processed packaged foods presented for sale in a retail environment. |
| Have products with compound ingredients within the ingredient listing been taken into consideration when calculating the Health Star Rating? | Manufacturers should have the composition data available to them of compound ingredients that they use. This data is needed for the accurate presentation of a Nutrition Information Panel, and so should similarly be available for accurate calculation of the Health Star Rating. |
| Why are indulgent foods allowed to use the Health Star Rating system? As the wording suggests that indulging is good for you – is this misleading, associating confectionary with the Health Star Rating? | The Health Star Rating system has been designed for use across all processed packaged foods presented for sale in a retail environment as a means of assisting consumers to understand the quantity of nutrients within products. The Australian Dietary Guidelines should still guide overall consumption. |

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| <p>Will the Health Star Rating have analysis for groups e.g. infants, maternal, elderly?</p> | <p>It is not intended that the Health Star Rating system will have an analysis for particular groups, as the Australian Dietary Guidelines should still guide overall consumption.</p> <p>However, the Health Star Rating Style Guide states that specific food products that should not display the Health Star Rating system graphic include:</p> <p>Certain Special Purpose Foods in Part 2.9 of the Australia and New Zealand Food Standards Code where there are required compositional formulations, namely:</p> <ul style="list-style-type: none"> • Infant formula products – Standard 2.9.1; • Food for infants – Standard 2.9.2; • Formulated Supplementary Foods for young children – Standard 2.9.3 (including toddler milks and formulated supplementary foods intended for young children); • Formulated Supplementary Sports Foods – Standard 2.9.4; and • Foods for Special Medical Purposes –Standard 2.9.5. (i.e. supplementary foods defined in Standard 2.9.3 that are general purpose foods [Category 1D or 2D] may use the Health Star Rating system). |
| <p>Can we get regular information from Health Star Rating Advisory Committee on recent progress of the Health Star Rating system, in particular the system regulation and socialisation?</p> | <p>The Health Star Rating Advisory Committee posts an update after each meeting on the <i>Department of Health website</i>.</p> |
| <p>In the Health Star Rating Style Guide or Health Star Rating website, is there already a health star guide for all the product categories? e.g. fruit juice is in the range of 3.0 – 4.0?</p> | <p>There is no minimum star rating for any category under the Health Star Rating system. Each of the six (6) Health Star Rating categories is centred (albeit to a different point), and there will be products that are lower than each centre point. There is the potential for the full 1/2 to 5 star range to be covered in each category based on the individual nutritional composition of the range of products within the category.</p> |

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| <p>Is there already a rule of thumb of some sort for if say I would like to improve a health star rating of say 3.5 to 4.0 or a trial and error in the Health Star Rating Calculator?</p> | <p>The Guide for Industry to the Health Star Rating Calculator includes the full tables of Health Star Rating baseline and modifying points scored for the different nutrients and energy, in each Health Star Rating category. Consideration of these tables, and also trying variations in the Health Star Rating Calculator, will provide guidance of where reformulation to improve the Health Star Rating score may be possible.</p> |
| <p>Can you, or will you, specify specific foods in an exclusion list i.e. honey, jams, spreads?</p> | <p>The Health Star Rating System Style Guide provides an explanation of products that should not display a Health Star Rating system graphic, and products for which the system was not intended.</p> |
| <p>We do not anticipate utilising this system as our products are typically sold in health food stores and health aisles of supermarkets. Yet, they have low health star ratings (typically 1-2 stars). How do we address consumer expectations of using the Health Star Rating?</p> | <p>The Health Star Rating campaign (including the Health Star Rating website) will raise consumers' awareness and understanding of the Health Star Rating system.</p> <p>The Australian Dietary Guidelines should still guide overall consumption.</p> <p>The website includes stakeholder kits that provide information for industry to use to assist with the delivery of communications to their networks and ensure consistency of messaging about the Health Star Rating system. These kits include:</p> <ul style="list-style-type: none"> • Key Health Star Rating system messages; • Editorial for newsletters, websites, etc; • Campaign material and 'basket' mnemonic; • Content for social media; and • Frequently asked questions. |
| <p>How do we discourage major supermarket chains from making a blanket policy to uptake the Health Star Rating system?</p> | <p>Adoption of the Health Star Rating system is voluntary. Its uptake will be determined by food companies.</p> |

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| <p>How do people with a chronic illness, such as diabetes, gain a better understanding of what to put in their basket using this health star system for shopping choices?</p> | <p>The Health Star Rating system does not consider specific needs/dietary requirements and therefore it should not be used as a proxy for dietary advice regarding particular health conditions from a qualified practitioner.</p> |
| <p>How will you train industry users on the calculator?</p> <p>Where do I find more information on how to calculate the Health Star Rating, and to look at the tables?</p> | <p>The Guide for Industry to the Health Star Rating Calculator is a useful tool to assist industry in calculating star ratings. The Guide is available on the Health Star Rating website.</p> <p>For further information the FoPL Secretariat can be contacted on 1800 099 658 (free call).</p> |
| <p>What are the certain ‘<i>fresh value added products</i>’ that are excluded?</p> | <p>“<i>Fresh value added products</i>” is a broad term describing short shelf life food and beverage products intended to be consumed shortly after purchase. Such products are often prepared and packaged on the premises from which they are sold.</p> <p>The Australia and New Zealand Food Standards Code exempts certain ‘Fresh value-added products’, such as packaged fruit, vegetables, meat, poultry and fish, and pre-packaged rolls and sandwiches from Nutrition Information Panel labelling. While the Health Star Rating may be used in relation to such foods, there is no expectation that such packages would carry Health Star Rating labelling unless the products are of standardised composition and label space permits (e.g. bulk-produced pre-packaged sandwiches or wraps).</p> |
| <p>How do we find out about the anomalies? How is this communicated?</p> | <p>The process to assess potential anomalies within the Health Star Rating Calculator is available on the Health Star Rating website.</p> <p>A register of submissions, including a brief summary of the content and the Health Star Rating Advisory Committee consideration will be made available on the Health Star Rating system website.</p> |

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| <p>Consumers are looking for products with the Health Star Rating graphic on the shelf – what about packaged veg that doesn't require a Nutrition Information Panel - there will be no Health Star Rating. Will consumers then not buy these products (causing these products to delist)?</p> | <p>The Health Star Rating system has been optimised for application to packaged food products presented for retail sale through supermarkets and similar retail outlets. The Health Star Rating system is not intended to apply to any type of fresh produce, including fruits and vegetables.</p> <p>The Health Star Rating system education campaign will communicate the intent of the system and the importance of fruit and vegetable intake.</p> |
| <p>This is a tool to make healthy choices within a product category but doesn't tell consumers how a serving size contributes to their daily intake requirements.</p> | <p>Information provided by way of the Health Star Rating system should be considered in conjunction with the Australian Dietary Guidelines and the Australian Guide to Healthy Eating, both of which provide information about serve size.</p> <p>The Health Star Rating website includes information about total diet, and links to the Australian Dietary Guidelines and Eat for Health webpages.</p> |
| <p>Should this tool be combined with the Australian Food and Grocery Council's Daily Intake Guide to make it a more robust tool?</p> | <p>Per pack representations of the Health Star Rating graphic have the option of including %DI information for Energy.</p> <p>The Health Star Rating graphic can be used on food packages that also use the Daily Intake Guide, if food companies wish to use both; however, the Style Guide specifies that they should be placed so that they do not lead consumers to believe that they are linked or are two parts of a single system.</p> |
| <p>Regarding the grey area of non-nutritive foods being excluded from the Health Star Rating system, and the suggestion that products with Nutrition Information Panels <i>should</i> use the Health Star Rating system, how should zero calorie beverages comply?</p> | <p>A useful rule of thumb is that if a food product is subject to the label requirements outlined in the Australia and New Zealand Food Standards Code and carries a Nutrition Information Panel, then the use of the Health Star Rating system should be considered.</p> <p>Zero calorie beverages (such as diet cola) have not been excluded from the Health Star Rating system.</p> |

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| <p>This system poses unnecessary cost on the food industry and ultimately the consumer will have to pay for it. There is no evidence that this scheme will have the desired and positive impact. Please send the cost benefit analysis document.</p> | <p>The business case completed by PricewaterhouseCoopers (PwC) includes a cost benefit analysis of the voluntary implementation of the system.</p> <p>PwC conclude in their report that there is clear evidence that interpretive Front-of-Pack Labelling schemes like the Health Star Rating system are an effective tool to assist consumers to make healthier food choices.</p> <p>PwCs iterates that consumers could potentially face marginally higher prices, to the extent that the industry faces increased costs and are unable to absorb these costs. They go on to cite research however that concludes that it is unlikely that labelling changes will directly drive higher costs faced by consumers.</p> <p>This report is available online at the Department of Health website.</p> |
| <p>Why could we not invest time in more legible Nutrition Information Panels?</p> | <p>A revision to the requirements for the Nutrition Information Panel is outside the scope of the Health Star Rating system. Requirements for the Nutrition Information Panel are overseen by Food Standards Australia New Zealand as part of the Food Standards Code.</p> |
| <p>Why don't we ensure that the Nutrition Information Panel and other food science and nutrition are addressed in high schools?</p> | <p>Education relating to mandated components of food labels and food science and nutrition are outside the scope of the Health Star Rating system education campaign. Questions relating to education curricula should be directed to relevant State/Territory education departments.</p> |
| <p>Was the Energy Star Rating System roll-out for whitegoods used as a reference point for the HSR – i.e. what worked, what didn't work?</p> | <p>No, it was not used as a reference point.</p> |
| <p>Are small goods (ie salami, pancetta) a part of the 'protein' group on the calculator?</p> | <p>Goods such as salami and pancetta are Category 2 foods in the Health Star Rating Calculator.</p> |

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| Value-added meat ‘further cooking’ (pre-packed meat) having Nutrition Information Panels were reported in presentation as excluded, but for industries wanting to have Health Star Rating, can they use the calculator? | <p>A useful rule of thumb is that if a food product is subject to the label requirements outlined in the Australia and New Zealand Food Standards Code and carries a Nutrition Information Panel, then the use of the Health Star Rating system should be considered.</p> <p>In the case of meat products that are packaged in the presence of a customer or are packaged and displayed in an assisted service display cabinet are exempt (under Clause 2 of Standard 1.2.1 of the Australia and New Zealand Food Standards Code) from many of the labelling requirements outlined in the Code. Accordingly, although not excluded from displaying a Health Star Rating, manufactures/retailers may deem it not appropriate for these products to display a Health Star Rating when they do not carry a label or a Nutrition Information Panel.</p> <p>Manufacturers of prepacked value-added meat, such as marinated meats or stuffed meat products that are prepared to a standardised composition may choose to use the Health Star Rating label. See Section 3 of the Style Guide for further information.</p> |