

## Health Star Rating Advisory Committee (HSRAC)

### Register of potential anomalies submitted to the HSRAC for consideration

To be deemed an anomaly, the Health Star Rating (HSR) system produces star ratings of individual products or groups of products that are either:

- inconsistent with the Australian Dietary Guidelines (ADG); or
- do not enable valid comparisons between foods based on the agreed food components (energy, saturated fat, total sugars, sodium, protein, dietary fibre and fruit, vegetables, nut and legumes (FVNL)); and
- the matter wasn't previously determined as a result of the Five-Year Review of the HSR system.

Application number	Date Submitted	Brief description of application (as submitted by applicant)	Date Considered by HSRAC	HSRAC determination	Rationale	Outcome / Next steps
AS2024-1	03/05/2024	A 5-star rating for eggs better communicates to consumers the nutritional profile of eggs and highlights them as a healthy option similar to other whole foods within the lean meats and alternatives food group in the Australian Dietary Guidelines. Eggs currently rate 4 stars.	12/07/2024	<b>Rejected:</b> application is deemed not an anomaly	Eggs are not considered intended products under the HSR system, on the basis that their composition does not vary significantly across products. The general intent of the HSR system is to help consumers choose between similar products, and it is unlikely that most consumers would compare eggs with the other products in the lean meats and alternatives group. A secondary intent at the creation of the system was that "core" foods would rate at least 3.5 stars, and eggs rate 4 stars. The current rating of 4 stars is appropriate.	No further action.

Application number	Date Submitted	Brief description of application (as submitted by applicant)	Date Considered by HSRAC	HSRAC determination	Rationale	Outcome / Next steps
AS2024-2	06/06/2024	Some products meet the criteria for Category 2D – Dairy Foods but because they are a frozen product they are not eligible for 2D. Using Category 2 they receive a lower HSR. These products should be categorised as 2D- Dairy Foods.	12/07/2024	<b>Rejected:</b> application is deemed not an anomaly	Category 2D is intended for core dairy products. Some refrigerated dairy desserts which are considered discretionary foods are also eligible for this category to enable comparison across products which consumers are likely to be choosing between. Ice-cream and other frozen products are not considered core dairy products and consumers are unlikely to be comparing an ice-cream to a core dairy product such as yoghurt. Therefore it is not appropriate to expand category 2D to include frozen products. 3 stars is an appropriate rating for ice cream products, noting that there may be scope for them to be reformulated to achieve a better rating.	No further action.

Application number	Date Submitted	Brief description of application (as submitted by applicant)	Date Considered by HSRAC	HSRAC determination	Rationale	Outcome / Next steps
AS2023-1	18/05/2023	Our product is a flavoured water. However, we have zero across the nutrition panel with zero sugar, zero calories/kilojoules, and zero on every category. Our product took years of research and development and is backed by science to create a flavoured water product that is 100% healthy in every way and is just like drinking plain water but with a little taste of flavour.	26/05/2023	<b>Rejected:</b> application is deemed not an anomaly	Upon further discussions, we acknowledge your statement regarding the product has zero nutrient values. The FoPL Secretariat cannot state zero values when the report states for example energy at 10kj/100ml. Below is the link to the NSW Food Authority which can assist manufacturers with product enquiries. Furthermore, the products ingredients contains a permitted flavouring substance (as defined by Standard 1.1.2-2 of the Code) and therefore has a HSR of 4.5 stars.	No further action.
AS2021-1	1/10/2020	The reclassification of water-based ice confections out of Category 2 – Foods, and into Category 1 - non-dairy beverages means HSR no longer guides towards healthier choices in the ice cream category.	5/8/21	<b>Rejected</b>	Noting the decision to re-categorise ice confections as non-dairy beverages during the Five-Year Review of the HSR System, the HSRAC considers it is not appropriate to class this submission as an anomaly.	No further action.
AS2021-2	04/08/21	Dairy protein products utilising Whey Protein can benefit from the Dairy Calculator as it's a dairy based product. This results in higher ratings compared to the non-dairy beverages calculator. Non-dairy protein should be reflected similarly.	30/11/21	<b>Rejected</b>	The pea protein products referenced in the submission do not appear to contain sufficient calcium required to be considered a Category 1D dairy beverage. Dairy beverage alternatives derived from legumes are eligible for this category if they contain at least 100mg calcium per 100ml and contain no less than 3% m/m protein derived from that legume.	No further action.