Uptake of the Health Star Rating system as at November 2025

A report on progress against the final target of the Health Star Rating system

January 2026

Introduction

The Health Star Rating system (HSR) is a voluntary front-of-pack labelling system. It rates the overall nutritional profile of packaged food and assigns it a rating from ½ a star to 5 stars. It provides a quick, easy, standard way to compare similar packaged foods.

The HSR system was first implemented in Australia and New Zealand in June 2014. It is jointly funded by the Australian, state and territory and New Zealand governments.

Following an independent review of the HSR system in 2019 (the Five Year Review), Food Ministers in Australia and New Zealand set the following uptake targets for the system:

- Interim target 1: 50% of intended products apply an HSR by 14 November 2023
- Interim target 2: 60% of intended products apply an HSR by 14 November 2024
- Final target: 70% of intended products apply an HSR by 14 November 2025.

Ministers agreed that if the final target is not met, they will consider mandating the system.

Data to monitor progress towards these targets are analysed in Australia by Food Standards Australia New Zealand (FSANZ), and in New Zealand by New Zealand Food Safety (NZFS). FSANZ and NZFS used similar methodology agreed by FMM to determine uptake.

Uptake targets are measured based on total stock keeping units (SKUs) intended to apply the HSR system. This is intended to:

- illustrate the absolute number of foods carrying the HSR irrespective of the market share of products
- achieve the broadest coverage across the food supply, including by targeting both high selling and lower selling products
- maximise the information available to consumers at the point of purchase.

Uptake monitoring 2025

As at November 2025, the HSR was displayed on an estimated:

- 39% of intended products in Australia; and
- 36% of intended products in New Zealand.

The results show an increase from 35% in Australia and 33% in New Zealand last year. However, the findings are substantially below the final target of 70%.

Data from Australia's four major retailers, brand owners and in-market collections were analysed by FSANZ. In Australia, there were an estimated 27,939 products intended to display the HSR system. The HSR was found to be displayed on 10,764 of those (39%). A detailed report for Australia is at Attachment 1.

In New Zealand, data were collected by GS1 and analysed by New Zealand Food Safety using the New Zealand On Pack Database. This database predominantly includes food product information from the two major supermarket retailers. In New Zealand, 19,021 products intended to display the HSR system were identified. The HSR was found to be displayed on 6,834 of those (36%). A detailed report for New Zealand is at Attachment 2.

Since 2023, uptake data has been collected as a proportion of *intended* products only. In the lead up to the Five Year Review of the HSR system (2019), uptake was measured as a proportion of *both intended and permitted* products. At that time (June 2018), the HSR appeared on 31% of *intended and permitted* products (5,448 products) in Australia and 21% of *intended and permitted* products (2,997 products) in New Zealand. The results of this report cannot be compared to official monitoring undertaken prior to 2023, or non-government HSR uptake estimates. This is because of the different methods and sources of product data used for the analysis.

Permitted, intended and prohibited foods

Data on the uptake targets is reported as a proportion of *intended* foods.

Most packaged foods are *permitted* to use the system. Foods *intended* to carry the HSR system are those that:

- are permitted to use the system; and
- are required by the Australia New Zealand Food Standards Code to have a nutrition information panel (NIP); and
- can vary in nutritional composition.

Intended foods do *not* include the following, even though they are eligible for an automatic 5-star rating:

- fresh fruit and vegetables
- minimally processed fruit and vegetables that have only been peeled, cut, surface treated, blanched or frozen, and
- plain (packaged) water.

Foods prohibited from using the system include alcohol, infant formula, certain special purpose foods and kava.

HSR Monitoring Framework

The Food Regulation Standing Committee (FRSC) developed an HSR monitoring framework[1] to guide priority areas of enquiry for the HSR system in Australia and New Zealand for the period 2023-2025. The aim of the framework is to both guide monitoring of the updated HSR system (following the finalisation of the Five Year Review) and maximise consistency of monitoring approaches between Australia and New Zealand. The framework identifies monitoring progress against uptake targets as an 'essential monitoring requirement' under the 'uptake area of enquiry'.

Annual monitoring plans, providing specific detail of monitoring areas for each year, are developed. More information on the Health Star Rating system, including the Monitoring Framework and Plans, can be found at www.healthstarrating.gov.au.

[1] Health Star Rating system post five-year review. Monitoring Framework. July 2023. Available at: http://www.healthstarrating.gov.au/internet/healthstarrating/publishing.nsf/Content/01C15064FB52327BCA25861D00364E60/$File/Monitoring%20Framework%20-%20final.PDF

Next steps

In 2020, when Food Ministers set uptake targets for the system, they agreed that if uptake did not reach 70% of intended products by November 2025, they would consider mandating it. Noting the low uptake against the first target, in July 2024, Food Ministers requested FSANZ start preparatory work to inform ministers' future decision-making on mandating the HSR system, if the final target is not met.

Ministers will be invited to consider this report, along with reports on consumer research and FSANZ's preparatory work, in early 2026, and will make a decision on next steps accordingly. Decisions of the Food Ministers' Meeting are publicised on the Food Regulation website: foodregulation.gov.au.

Attachment 1

FOOD STANDARDS Australia New Zealand
Te Mana Kounga Kai – Ahitereiria me Aotearoa

Health Star Rating Uptake in Australia

Report on progress against Health Star Rating uptake targets: Final Target, 2025

December 2025

Disclaimer

While every effort has been made to ensure the information in this publication is accurate, Food Standards Australia New Zealand does not accept any responsibility or liability for error of fact, omission, interpretation or opinion that may be present, nor for the consequences of any decisions based on this information.

For more information email information@foodstandards.gov.au.

Executive summary

The Health Star Rating (HSR) is a voluntary front-of-pack labelling system that rates the overall nutritional profile of packaged food to support consumers to make informed choices. The system uses a rating scale of 0.5 to 5 stars to provide a standardised way for consumers to compare the relative healthiness of similar packaged foods. When comparing similar products, the more stars, the healthier the choice.

The HSR system was implemented in Australia and New Zealand in June 2014, and is jointly funded by Australian, state and territory and New Zealand governments. An independent review of the system was conducted in 2019.

In 2020, Food Ministers in Australia and New Zealand set the following uptake targets for the voluntary system:

- Interim target 1 (at 3 years): 50% of intended products have applied the HSR by 14 November 2023
- Interim target 2 (at 4 years): 60% of intended products have applied the HSR by 14 November 2024
- Final target (at 5 years): 70% of intended products have applied the HSR by 14 November 2025.

Food Standards Australia New Zealand (FSANZ) is an independent technical advisor to the HSR system and is responsible for the data collection and analysis required to report on uptake in Australia. This document is FSANZ's report on uptake against the final target.

Data considered within the analysis included label information provided by brand owners, outputs of in-market data collection and national product range files provided by Australia's four major retailers.

In November 2025, there were an estimated 27,939 products intended to display the HSR system. The HSR system was found to be displayed on 10,764 intended products, representing uptake of 39%. This is below the final uptake target of 70%.

Methodologies and data sources used by FSANZ to report the final target are comparable to those used in previous reports.

CONTENTS

Purpose

The purpose of this document is to report on Health Star Rating (HSR) uptake in Australia against the final target – 70% of intended products applying HSR by 14 November 2025.

Introduction

Health Star Rating system

The Health Star Rating (HSR) is a voluntary front-of-pack labelling system that rates the overall nutritional profile of packaged food to support consumers to make informed choices. The system uses a rating scale of 0.5 to 5 stars to provide a standardised way for consumers to compare the relative healthiness of similar packaged foods. When comparing similar products, the more stars, the healthier the choice.

The HSR system is a joint initiative between the Australian Commonwealth, state and territory and New Zealand governments. It was developed in collaboration with the food industry, public health and consumer groups and was implemented in Australia and New Zealand in 2014.

Food Standards Australia New Zealand (FSANZ) is an independent technical advisor to the HSR system. FSANZ manages and maintains the HSR algorithm and calculator binationally and are responsible for data collection and analysis required to report HSR uptake in Australia. New Zealand Food Safety is responsible for monitoring implementation of the HSR system in New Zealand.

Uptake targets

An independent review of the HSR system (the review) was carried out in 2019, following 5 years of implementation of the system. The review recommended that '*the HSR system remain voluntary, but with clear uptake targets set and all stakeholders working together to drive uptake. If the HSR system continues to perform well but the HSR is not displayed on 70% of target products within five years of a government decision, the HSR system should be mandated*.'

In 2020, the then Australia and New Zealand Ministerial Forum on Food Regulation (now the Food Ministers' Meeting) supported this recommendation and set uptake targets for the HSR system:

- Interim target 1 (at 3 years): 50% of intended products have applied the HSR by 14 November 2023
- Interim target 2 (at 4 years): 60% of intended products have applied the HSR by 14 November 2024
- Final target (at 5 years): 70% of intended products have applied the HSR by 14 November 2025.

Products intended to display an HSR

Foods intended to carry the HSR system[2] are those that:

- are permitted to use the system; and
- are required by the Australia New Zealand Food Standards Code to have a nutrition information panel (NIP); and
- can vary in nutritional composition.

[2] Health Star Rating System: Targets and intended products. Available at: Intended products | Health Star Rating System

Intended products do *not* include:

- fresh and minimally processed fruits and vegetables
- plain (packaged) water (including sparkling water)
- unpackaged foods and
- foods not required to bear a NIP.

Further information on intended products can be found at Appendix 1.

HSR monitoring framework

The Food Regulation Standing Committee (FRSC) developed an HSR monitoring framework[3] to guide priority areas of enquiry for the HSR system in Australia and New Zealand for the period 2023-2025. The aim of the framework is to both guide monitoring of the updated HSR system post review and maximise consistency of monitoring approaches between Australia and New Zealand. The framework identifies monitoring progress against uptake targets as an 'essential monitoring requirement' under the 'uptake area of enquiry'.

An HSR monitoring plan for 2025 was developed to provide further detail on monitoring against the final uptake target[4].

Methodology

To be able to determine HSR uptake as a proportion of intended products, FSANZ determined the total number of products:

- **intended to apply the HSR system** in the Australian market, as represented by products ranged by Australia's four major retailers (ALDI, Coles, Metcash[5] and Woolworths)
- **intended to AND applying the HSR system** in the Australian market, as represented by products ranged by Australia's four major retailers.

Criteria and documented assumptions (refer to Appendix 1) supported the categorisation of intended products across all data files. Approaches and decisions were discussed with New Zealand Food Safety to ensure consistency in categorisation across countries.

Determining the Intended Count

The total number of intended products available in Australia was estimated by FSANZ using data from product range files provided by Australia's four major retailers to align with the November reporting period.

FSANZ reviewed the data provided by each retailer to identify a unique list of food and beverage products available in-market by removing duplicate records and non-food and festive products[6]. All remaining products were then categorised as either:

- permitted and intended to display an HSR
- permitted but not intended to display an HSR
- not permitted to display an HSR.

[3] Health Star Rating system post five-year review. Monitoring Framework. July 2023. Available at: https://www.healthstarrating.gov.au/sites/default/files/2024-12/Monitoring%20Framework%20-%20final.pdf

[4] Health Star Rating system. Year 5 monitoring plan. Available at: https://www.healthstarrating.gov.au/sites/default/files/2025-03/HSR%20-%20Year%205%20Monitoring%20Plan%20-%20final.PDF

[5] Metcash is a wholesale distribution and marketing company that supports the independent business sector. Whilst not truly a 'retailer' Metcash is referenced as a retailer in this report for simplicity and with reference to their sale of Black and Gold and Community Co brands to independent store owners Australia wide.

[6] Festive products were excluded from the analysis as the data may not adequately capture all such products which are only available at certain points of the year.

Determining Uptake number

The total number of intended products available in Australia and applying the HSR system was estimated using data provided to FSANZ by brand owners or collected by FSANZ through in-market collection. Table 1 provides a summary of the in-market collection which took place during October and November 2025 using image collection tools developed by GS1 Australia.

A total of 11,537 products with an HSR were identified using the two collection methods. Of these, 10,764 were categorised as permitted and intended to display an HSR at 14 November 2025 and were used for further analysis.

Table 1: Details of In-store Data Collection*

Source	Location	Products included
Aldi	• Majura Park ACT	All ALDI branded products observed in store on collection days.
Woolworths	• Majura Park ACT	All products observed in store on collection days.
Coles	• Dickson ACT	

*Metcash supplied data for 2025 so IGA in-store collection was not required. If data for a product was collected in-store, and provided by a brand owner, only the brand owner data was included in the analysis to avoid duplication.

Results

The number of intended products identified as displaying an HSR were calculated as a proportion of the total number of intended products to determine the percent of intended products displaying an HSR in Australia.

FSANZ determined there were 27,939 products in the Australian market that are intended to display an HSR.

The HSR system was displayed on 10,764 products that were both intended to carry an HSR and were considered available for purchase at one or more of Australia's leading four retailers at 14 November 2025.

Products that are intended to and did display the HSR system therefore account for 39% of all products that are intended to display an HSR at 14 November 2025.

In addition, an HSR was displayed on 654 products that are permitted but not intended to display an HSR – most of these products were single ingredient foods (e.g. sugar, fresh meat), packaged water and fresh and minimally processed fruits and vegetables.

An HSR was displayed on 16 products that are not permitted to display an HSR. All of these were labelled as Formulated Supplementary Sports Food. The results of this report can be compared to FSANZ's 2023 and 2024 reports on progress against HSR interim uptake targets but cannot be compared to previous HSR uptake estimates for Australia that pre-date the 2023 report due to the different methodology and sources of product data used for the analysis.

Conclusion

HSR was observed on 39% of products intended to display the system in Australia.

This result is below the HSR system final target - 70% of intended products have applied the HSR system by 14 November 2025.

Attachment 1

Appendix 1

Guidance on the classification of foods as 'intended', 'permitted but not intended', or 'not permitted' to display a Health Star Rating (HSR)

Table 1: Intended foods

Products intended to display an HSR

Packaged food product for retail sale:
• NOT specifically noted in tables 2 and 3 below
• that ARE required to carry a nutrition information panel (NIP) (per Australia New Zealand food Standards Code (FSC) Standard 1.2.8), and
• that CAN vary in nutrient composition. This includes:
  ○ products for which composition can be altered - i.e. multi-ingredient processed packaged foods
  ○ foods that can vary in nutritional composition when compared to other varieties of the same food – e.g. single ingredient foods such as flours and starches, grains, nuts and legumes, milk, edible oils, cocoa and carob powders and canned fruits and vegetables
  ○ foods whose processing changes the nutritional composition significantly compared to the unprocessed variety – e.g. dried fruits and vegetables (including freeze dried and powders), juiced fruit and vegetables
  ○ fresh single ingredient fruits, vegetables, poultry, meat and fish with added ingredients (including sugar and/or salt and/or fat)
  ○ meat, poultry and fish mixtures that comprise more than one category of ingredient

Table 2: Not - intended foods

Products permitted but not intended to display an HSR
Fruit and vegetables: All whole fresh fruit (except coconut) and vegetables, fungi and legumes (except peanuts) as sold with no processing, plus these same products that have only been peeled, cut and/or surface treated and/or blanched and/or frozen (not dried).
Meat, poultry, and fish that comprise a single ingredient or category of ingredients with nothing added - fresh and frozen included
Plain and sparkling water/mineral water and ice (FSC Standard 2.6.2)
Prepared filled rolls, sandwiches, bagels and similar products (*N.B. frozen are considered standardised and are considered 'intended'*)
Tea or coffee, or instant tea or instant coffee – includes freeze dried coffee and herbal and fruit teas
A herb, a spice or a herbal infusion
Iodised salt, reduced sodium salt mixture, salt or salt substitute
Vinegar or imitation vinegar
A substance that is approved for use as a food additive
A substance that is approved for use as and/or is used as a processing aid
Gelatine (also excluded agar)
Jam setting compounds
A food in a small package
Foods that do not vary in nutritional composition e.g. Sugar, sugar substitutes, glucose and glucose syrups Eggs Baking additives such as citric acid, tartaric acid, baking soda, cream of tartar, extracts, essences, food colouring, xanthan gum, agar agar

Table 3: Not permitted

Products not permitted to display an HSR
Infant formula (FSC Standard 2.9.1)
Food for infants: First foods with age range that starts <12 months (FSC Standard 2.9.2)
Formulated Supplementary Foods for young children (FSC Standard 2.9.3 Div 4) - includes toddler milks and formulated supplementary foods intended for young children.
Formulated Supplementary Sports Foods (FSC Standard 2.9.4) – assessed as such if products carry the prescribed name “formulated supplementary sports food”
Foods for special medical purposes (FSC Standard 2.9.5)
Beverages containing more than 0.5% alcohol by volume – examples may include kombuchas and/or other fermented beverages
Beverages that contain less than or equal to 0.5% alcohol by volume that resemble an alcoholic beverage and are marketed as a non-alcoholic variant or brand extension of an alcoholic beverage
Alcohol kits - including mixes designed to be used to make alcoholic drinks (e.g. cocktail kits).
Kava
Products not eligible to carry a nutrition content claims and health claims, as listed in FSC Standard 1.2.7 i.e. Foods intended for further processing or labelled prior to retail sale Foods delivered to a vulnerable person by a delivered meal organisation Foods provided as an institutional meal

Attachment 1

Additional decisions made by FSANZ in assessing whether a product was intended, not-intended, not-permitted, excluded from scope or not in-scope.

Not in scope:

- Any product that is not a food, e.g. coupons, display units, general merchandise
- Any product that is not a packaged/labelled food, e.g. clearly intended for sale in the delicatessen, or in bulk bins
- Any product not intended for the consumer in the form listed, e.g. pallets, cartons of meat, food service items, bulk salads, bulk cheese
- Products sold by retailer online only and as a wholesale product
- Products presented as medicinal - e.g. throat lozenges
- Festive items – any product that is/is known to be an 'Easter', 'Christmas', 'Halloween', Mother's/Father's Day' product.

Intended:

- Products 'not intended' in whole form, but reformed and presented on shelf with other 'like' products that are intended - e.g. whole canned tomatoes with nothing added presented on shelf with canned tomatoes with added ingredients.
- Eggs out of their shell – e.g. Packages contained fresh or frozen whole eggs, egg whites, egg yolks with shell removed.
- 'Sugar like products' often used in place of sugars that are not 100% sugar – e.g. golden syrup, agave syrup, treacle, maple syrup
- Vegetable and protein (meat, poultry, fish) mixtures that do not have any additional ingredients or added sugar and/or salt and/or fat (mixed dish).
- Vinegars noted to be a 'glaze'.
- Mixtures of herbs, spices, salts, salt substitutes with additional ingredients such as rice flour and/or seeds and/or nuts - e.g. steak seasoning, zaatar, dukkah
- Instore bakery products (excepting single and loose items)
- Frozen (but not crumbed/battered/flavoured) seafood products with added mineral salts and/or preservatives.
- Liqueur custards/creams and foods containing alcohol – i.e. these were not excluded on the basis of the alcohol exclusions for beverages.
- Chewing gum

Not intended:

- Vinegar - all varieties of vinegar including those noted as caramelised
- Bread rolls and instore bakery products noted as 'single' or 'loose'
- Products other than bakery that are cooked in store – e.g. roast chicken, roast beef
- In-store food service items and non-standardised prepared/fresh foods that did not – e.g. sushi stations
- Mixtures of herbs and/or spices and/or salts and/or salt substitutes without additional ingredients.
- All cooking wines – e.g. rice wine, Chinese cooking wine
- Fruit and vegetable mixtures – e.g. carrot sticks and watermelon snack pots
- Confectionery products known to be exempt from NIP labelling (small package)

Attachment 2

New Zealand Food Safety
Haumaru Kai Aotearoa

Uptake of Health Star Rating in New Zealand in 2025

Report of progress against the final Health Star Rating uptake target in New Zealand

December 2025

Te Kāwanatanga o Aotearoa
New Zealand Government

Ministry for Primary Industries
Manatū Ahu Matua

Disclaimer

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1 Executive summary

The Health Star Rating (HSR) system is a voluntary front of pack labelling system that aims to help consumers identify healthier choices when comparing similar foods. The system uses a rating scale of 0.5 to 5 stars. Foods with more stars are healthier than similar foods with fewer stars.

The HSR is a joint initiative between the New Zealand and Australian state and territory governments.

Foods intended to carry the HSR system are those that:

- Are permitted to use the system; and
- are required by the Australia New Zealand Food Standards Code to have a nutrition information panel; and
- can vary in nutritional composition.

In 2020, Food Ministers in Australia and New Zealand set the following uptake targets for the voluntary HSR system:

- Interim target 1 (at 3 years): 50% of intended products apply the HSR by 14 November 2023
- Interim target 2 (at 4 years): 60% of intended products apply the HSR by 14 November 2024
- Final target (at 5 years): 70% of intended products apply the HSR by 14 November 2025.

New Zealand Food Safety administers the HSR system in New Zealand and is responsible for monitoring the implementation of the system in New Zealand. The purpose of this document is to report HSR uptake against the final target in New Zealand.

This monitoring utilises the GS1 On Pack Database, an inventory of label information from packaged food products that are or were available in New Zealand supermarkets. Data on total food products currently available in the New Zealand market was extracted from the On Pack database in November 2025 and the 26,542 products were classified into one of the following groups:

1. Permitted and intended to display an HSR (n=19,021)
2. Permitted but not intended to display an HSR (n=3,358)
3. Not permitted to display an HSR (n=4,163).

In November 2025, 36% of products intended to use the HSR in the On Pack database (n=6,834) displayed the HSR system. This is substantially below the final target of 70%.

An additional 473 products such as meat, water, eggs and fresh/minimally processed fruit and vegetables permitted, but not intended, to display an HSR did so. Products prohibited from using the system did not display an HSR.

Uptake of the HSR has increased since 2023 and 2024, when monitoring found that the HSR was on 30% and 33% of intended products in New Zealand respectively. This was below the interim target 1 of 50% and interim target 2 of 60%.

New Zealand Food Safety utilised the same methodology and database to measure uptake against all targets to ensure results are comparable.

2 Purpose

The purpose of this document is to report the uptake of Health Star Rating (HSR) in New Zealand against the final HSR uptake target. The final uptake target is 70% of intended products have applied the HSR system by 14 November 2025.

3 Introduction

3.1 Health Star Rating system

The HSR system is a joint initiative between the New Zealand and Australian state and territory governments. It was developed in collaboration with the food industry, public health and consumer groups and has been implemented in Australia and New Zealand since 2014.

The HSR is an interpretive front of pack labelling system that rates the overall nutrient profile of packaged foods and assigns a rating from 0.5 star to 5 stars. The HSR system makes it quicker and easier to choose the healthier option when comparing similar packaged food (e.g. breakfast cereals). When comparing similar foods, foods with more stars are healthier than similar foods with fewer stars. The system cannot be used to compare dissimilar foods, such as a yoghurt with a soft drink.

3.2 Uptake targets

The HSR system underwent a major review in 2019 after five years of implementation. The independent reviewers recommended that the system remain voluntary, but that if the HSR is not displayed on 70% of intended products within five years that the system should be mandated.

In 2020, Food Ministers in Australia and New Zealand set the following uptake targets for the HSR:

- Interim target 1 (at 3 years): 50% of intended products apply the HSR by 14 November 2023
- Interim target 2 (at 4 years): 60% of intended products apply the HSR by 14 November 2024
- Final target (at 5 years): 70% of intended products apply the HSR by 14 November 2025.

3.3 Products intended to display a Health Star Rating

Foods intended to carry the HSR system are those that[7]:

- Are permitted to use the system (foods prohibited from using the system include alcohol, infant formula, certain special purpose foods and kava); and
- Are required by the Australia New Zealand Food Standards Code (Code) to have a nutrition information panel (NIP); and
- Can vary in nutritional composition.

Foods considered to vary in nutritional composition are individual foods that have a nutrient composition that can be altered intentionally (multi-ingredient processed packaged foods) and foods where similar products can vary in nutritional composition (for example foods such as flours and oils).

3.4 Health Star Rating monitoring and evaluation framework

New Zealand Food Safety administers the HSR system in New Zealand and is responsible for monitoring the implementation of the system in New Zealand. The HSR Unit, Department of Health, Disability and Ageing Australia is responsible for monitoring implementation of the system in Australia. Monitoring HSR uptake in Australia has been contracted to Food Standards Australia New Zealand (FSANZ).

The HSR monitoring framework[8] has been developed by the Food Regulation Standing Committee to guide priority areas of enquiry for the HSR system over the period 2023-2025 in both Australia and New Zealand. Monitoring against the established uptake targets is identified in this framework as an essential monitoring requirement. An HSR monitoring plan for 2025 was also developed which provided more details on how monitoring against the final uptake target was to be undertaken[9].

[7] Health Star Rating system. Targets and intended products. Available at: Intended products | Health Star Rating System

[8] Health Star Rating system post five-year review. Monitoring Framework. July 2023. Available at: Microsoft Word - D23-3704092 HSR - Monitoring Framework - final(2).DOCX

[9] Health Star Rating system. Year 5 monitoring plan. Available at: Microsoft Word - D25-1094119 HSR Year 5 Monitoring Plan - final.DOCX

4 Methods

4.1 GS1 on pack label database

New Zealand Food Safety contracts access to the GS1 On Pack Database[10]. This is an inventory of label information from ~62,000 packaged food products that are or were available in the New Zealand market. The database includes images of products and searchable digitised label information including ingredient lists, nutritional information, allergens, country of origin, health star ratings and claims.

The database predominantly includes food product information from the two major supermarket retailers, Foodstuffs New Zealand (New World, Pak'nSave, Four Square) and Progressive Enterprises (Woolworths, Foodtown, FreshChoice). It also has limited data from other retailers, such as liquor stores and specialty stores where there has been specified collection activity. Every six months the database is matched to Circana sales information to estimate product category coverage. As at May 2025, the database was estimated to represent over 90% of pre-packaged food sales in New Zealand.

The On Pack database has a rolling data collection, where products are continuously uploaded to the database when available. Product data comes into the database through the following channels:

- Physical product received by GS1 through ProductFlow[11]
- Through an in-market collection programme (audit or in-market collection)
- Directly from the supplier (in select cases)

The On Pack database categorises products according to the GS1 Global Product Classification (GPC)[12]. This groups products into categories based on their essential properties as well as their relationships to other products. This contains a hierarchy of classification, the highest level of classification is a 'segment' - this represents an industry sector (e.g. food/beverage/tobacco). The lowest level of classification is a 'brick' - this is a category of similar products (e.g. perishable milk).

Accuracy of the database is routinely checked through biannual audits. For each audit, GS1 randomly selects approximately 750 products in one supermarket (alternating between the different major supermarket retailers) and their product record is checked in the On Pack database. If the product is not already in the On Pack database this is added, or the necessary updates are made if the data needs to be updated. In 2025 the audit sample size was increased from 500 to 750 products. In-market collections can also be commissioned to fill identified data gaps or to ensure accuracy of the database for areas of interest.

4.2 Health Star Rating in-market collection

New Zealand Food Safety contracted GS1 New Zealand to conduct an HSR in-market collection to ensure that the On Pack database was up to date and reflected the HSR labelled products currently available in New Zealand supermarkets.

From July to September 2025, GS1 observed all HSR labelled products at the following stores within the specified collection scope:

- New World Chaffers St, Wellington
- New World Durham Street, Christchurch
- New World Mount Roskill, Auckland
- Woolworths Mount Roskill, Auckland

The collection scope focused on food categories that are intended to display an HSR. This included non-alcoholic beverages, confectionary, breakfast cereals, chilled dairy foods, convenience/snack foods, frozen foods, canned foods, sauces and spreads, bread and bakery products, baking needs, staples and oil/vinegar.

A total of 10,971 HSR-labelled products were observed and their product record checked against the label data in the On Pack database. Of these, the label information on 1,097 products was collected and digitised to the database as either a new product record (n=631) or existing product record updated (n=466).

[10] GS1 New Zealand. On Pack data collection. Available at: https://www.gs1nz.org/services/on-pack-data-collection/ (accessed December 2025).
[11] GS1 New Zealand. ProductFlow. Available at: https://www.gs1nz.org/services/product-flow/ (accessed December 2025).
[12] GS1. Global Product Classification (GPC). Available at: GPC Browser | GS1 (accessed December 2025).

4.3 Data analysis

All products in the On Pack database which had been purchased in the last 12 months were included in the analysis (excluding festive products[13]). Data was extracted from the database in November 2025.

All products included in the analysis (n=26,542) were classified into one of the following groups:

1. Permitted and intended to display an HSR (n=19,021)
2. Permitted but not intended to display an HSR (n=3,358)
3. Not permitted to display an HSR (n=4,163)

Where possible, all products in a GPC brick were automatically classified to one of these groups based on a previous analysis undertaken in 2022. For the current analysis, it was assumed that the 2022 classifications were still accurate as general product type in brick category remain relatively consistent. In 2023, FSANZ also independently classified GPC bricks into these three groups. This was compared with the New Zealand Food Safety 2022 classification of GPC bricks to ensure consistency between the analysis in Australia and New Zealand.

For GPC bricks that could not be automatically classified[14], each product in these GPC bricks (5,599 products) was individually classified into one of these three groups. Appendix 1 provides guidance on how products were classified into groups 1-3.

The same data analysis methodology was used to monitor uptake against the target in 2025, 2024 and 2023.

5 Results

In November 2025, the HSR system was displayed in the New Zealand On Pack database on 6,834 products intended to carry the system. This represents 36% of all products intended to display the system in this database. This is below the final uptake target of 70% of intended products having applied the HSR system by 14 November 2025.

In addition, an HSR was displayed on 473 products that are permitted to display an HSR but on which it was not intended. This includes categories such as unprocessed meat (n=20), water (n=43), eggs (n=50) and fresh/minimally processed fruit and vegetables (n=286).

None of the products prohibited from using the system were displaying an HSR. Alcoholic beverages or line extensions of alcoholic beverages made up the vast majority (over 90%) of products prohibited from using the system.

6 Discussion

An HSR was displayed on 36% of products intended to display the system. This is below the final uptake target of 70% of intended products having applied the HSR system by 14 November 2025.

New Zealand Food Safety used the same methodology and database as for the monitoring undertaken in 2023 against interim target 1 and 2024 against interim target 2. Uptake is slightly higher than in 2024 and 2023. In 2024 the HSR was on 33% of intended products in New Zealand[15] and in 2023 was on 30% of intended products[16]. Compared to 2024, 664 more intended products were now displaying the system. There were 30 more products intended to display the system on the market in 2025 compared to 2024 (18,993 in 2024 and 19,023 in 2025).

[13] Festive products were excluded from the analysis as the database may not adequately capture all such products which are only available at certain points of the year. Products were considered 'festive' if they had any of the following in their name: 'easter', 'hot cross bun', 'HXB', 'HX bun', 'chocolate egg', 'bunny', 'Christmas', 'XMAS', 'Santa', 'reindeer', 'fruit mince tart', 'Halloween', 'mother's day', 'father's day'.
[14] GPC bricks could not be automatically classified to a group when they contained products with a mixture of classifications.
[15] Uptake of the Health Star Rating system as at November 2024: a report on progress against interim target 2 of the Health Star Rating system (March 2025). Available at: https://www.healthstarrating.gov.au/sites/default/files/2025-03/Uptake%20of%20the%20Health%20Star%20Rating%20system%20as%20at%20November%202024%20-%20PDF.pdf
[16] Uptake of the Health Star Rating system as at November 2023: a report on progress against the first interim target of the Health Star Rating system (May 2024). Available at: http://www.healthstarrating.gov.au/internet/healthstarrating/publishing.nsf/Content/01C15064FB52327BCA25861D00364E60/$File/Uptake%20of%20the%20Health%20Star%20Rating%20system.pdf

The results from the monitoring in 2023, 2024 and 2025 cannot be compared to previous HSR uptake estimates undertaken in 2016 and 2018 in New Zealand. This is due to differences in methodology and databases. In 2018 and 2016, HSR uptake in New Zealand was calculated using the Nutritrack database[17], which New Zealand Food Safety contracted access to at that time, and the uptake was estimated on products eligible to display an HSR (both groups 1 and 2 above) rather than only products intended to display an HSR (group 1 above) as was the case in this monitoring.

New Zealand Food Safety identified two potential limitations as the HSR monitoring programme was being designed and implemented and undertook measures to mitigate the issues.

Firstly, it is possible that the On Pack database has not captured all products currently displaying an HSR in New Zealand. This was mitigated prior to monitoring through GS1 undertaking a HSR in-market collection (see section 4.2). GS1 and New Zealand Food Safety have also been engaging with industry to encourage them to ensure their product information was up to date in the On Pack database.

Secondly, there is a possibility that some products could have been misclassified as intended or not intended to display the HSR. This was mitigated by the same New Zealand Food Safety scientist undertaking the classification in 2023, 2024 and 2025. In 2023 the analysis was independently undertaken by two New Zealand Food Safety scientists and any differences discussed and reconciled. Broad categorisation approaches were discussed with FSANZ to ensure harmonisation with the parallel monitoring programme being carried out in Australia. These classification approaches were also applied in the 2025 monitoring.

7 Conclusions

In November 2025 in New Zealand, the HSR was observed on 36% of products intended to display the system. This is significantly below the final uptake target of 70% of intended products having applied the HSR system by 14 November 2025. Uptake is higher than in 2024 and 2023, which found that the HSR was on 33% and 30% of intended products in New Zealand respectively.

[17] New Zealand Food Safety 2018, Health Star Rating – Monitoring implementation for the Five Year Review, New Zealand Ministry for Primary Industries, October.

Appendix 1: Guidance on classification of foods as intended, permitted but not intended, or not permitted to display an HSR.

The following definitions guided categorisation of products into the three uptake groups.

Not permitted to display an HSR
Foods with the prescribed name “formulated supplementary sports food”
Foods for special medical purposes such as Optislim
Products designed for infants <1 year - includes infant formula and first foods with age range starting below 12 months
Alcohol or non-alcoholic beverages presented as a line extension of alcohol (e.g., alcohol free beer) or mixes designed to be used to make alcoholic drinks (e.g. cocktail kits). This includes Kombucha with ≥0.5% ABV.
Dietary supplements - e.g. capsules and tablets

Permitted but not intended to display an HSR
Foods not displaying a NIP or not intended to display a NIP[1]:
Foods which contain just a mixture of fruits or vegetables (except canned, dried or juiced varieties)
Fresh meat/seafood with no added ingredients
Plain and sparkling water/mineral water
Prepared sandwiches, filled rolls and similar
Plain tea and coffee (including freeze dried coffee and herbal teas)
Herbs and spices (without salt)
Salt (including iodised salt and those with just anti-caking agents)
Vinegar
Gelatine (also excluded agar)
Jam setting compounds
Foods which cannot vary in nutritional composition[2]:
Sugar, sugar substitutes, glucose and glucose syrups[3]
Eggs
Baking additives such as citric acid, tartaric acid, baking soda, cream of tartar, extracts, essences, food colouring, Xantham gum

1. Did not assess small pack exemption as this is difficult to do from images. Instead, excluded those not displaying a NIP
2. Preservatives and flavourings with no salt/sugar/fat were deemed to not alter the nutritional profile of food therefore foods containing these which met one of the above criteria were assessed as ‘not intended’ e.g. minted peas.
3. Note only these products by themselves were deemed ‘not intended'.

Permitted and intended to display an HSR
Foods which are not included in the above Tables
Foods which vary in nutritional composition:
Foods with added salt, fat, sugar/sweeteners
Foods which can vary in nutritional composition when compared to other varieties:
Milk
Flour (including corn starch)
Grains
Legumes
Canned vegetables and fruit[1]
Cocoa and carob powders
Foods whose processing changes the nutritional composition significantly compared to the unprocessed variety:
Dried fruit and vegetables (including freeze dried and powders)
Juiced fruit and vegetables

1. Include all canned varieties even if they don't have added salt/fat/sugar. This is because consumers will likely be comparing between canned varieties and many of these can have added salt/fat/sugar.