



4 June 2020

To: Front-of-Pack Labelling Secretariat
Via: email to frontofpack@health.gov.au

Dear Secretariat,

CHOICE urges Forum Ministers, FSANZ and the Front-of-Pack Labelling Secretariat to roll out the strongest possible Health Star Rating (HSR) system from 1 October 2020, without further delay.

People rely on Health Stars to help them cut through marketing spin. Three out of every five consumers have used HSR to influence their choice of groceries.¹ This is why the HSR formula must be based on Calculator 2, which more accurately factors in salt and sugar. This improved formula is the best possible way to help people looking to choose healthy options at the supermarket.

Food manufacturers will have two years to implement changes to this voluntary scheme, a timeline that's exceptionally generous. This rollout comes after the comprehensive five-year review process and strong calls from advocates to make the scheme mandatory. No further delay can be justified. Consumers cannot wait any longer for a more accurate front-of-pack labelling scheme.

Calculator 2 must be implemented from 1 October 2020

HSRs should properly reflect leading health advice on salt and sugar. This is why CHOICE supports the improvements reflected in Calculator 2, and calls on Forum Ministers to see through these changes from 1 October 2020.

Three quarters of all consumers who use HSRs trust the information on labels.² But when food manufacturers are able to game the system and create a 'health halo' – despite high levels of salt and sugar – they erode consumer trust in the ratings. When we showed consumers the impact of not properly accounting for sugars, here's what we heard:

"How Nutrigrain and Milo cereal could ever have been awarded 4 stars is appalling. Obviously laced with added sugar. Change the system now."

"That's why I have no faith in the star ratings. Amp up the restrictions and busy people actually might have a chance of buying healthier foods."³

Using Calculator 2 will build on the changes accepted by all Forum Ministers within Calculator 1 last year, and improve consumer confidence in the system.

Consumers need accurate HSRs during and after COVID-19

¹ CHOICE 2019, "Strengthening Health Star Ratings: Four reasons why Health Stars should be mandatory." Available at: <https://www.choice.com.au/food-and-drink/nutrition/food-labelling/articles/strengthening-health-star-ratings>, viewed May 2020.

² Ibid.

³ Consumer sentiment on Health Star Ratings via Facebook: <https://www.facebook.com/choiceaustralia/photos/a.10150141267371163/10157260004546163>, viewed May 2020.



The Secretariat and Forum Ministers must not delay improving the HSR system for consumers any longer.

Supermarkets have become even more crucial to consumers during the COVID-19 pandemic. Clear and accurate front-of-pack labelling will mean consumers can quickly and safely make good decisions in the shopping aisle, without necessarily having to pick up products and carefully examining nutritional information panels.

Timelines for implementation remain exceptionally generous. The business community will have two years to comply with formula changes within the voluntary scheme. We reiterate our calls to make the scheme mandatory in order to best help people make healthy food choices for themselves and their families.

Kind regards,

A handwritten signature in black ink that reads "J Kirby". The signature is fluid and cursive.

Jessica Kirby

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