

1 October 2020

FoPL Secretariat
MDP 707, Department of Health
GPO Box 9848
CANBERRA ACT 2601

Via Email: frontofpack@health.gov.au

Dear Dr Laajoki,

Re: Draft Health Star Rating (HSR) Calculator and Style Guide

Thank for providing the Australian Dental Association (ADA) with the opportunity to comment on the updated draft Health Star Rating (HSR) Calculator and Style Guide.

Please find the ADA's feedback below.

Glossary and Definitions

- Are there any definitions you would like further clarification on?
No
- Are there any additional definitions that you think should be included?
No

Application of the HSR system

- Does this section provide clarity on which foods should, and should not, carry a HSR?

This section broadly covers which products should display a HSR. The language could be strengthened to align with the objective to meet an uptake target of 70% coverage in five years and potentially a mandatory HSR in future. For example, food manufacturers are asked to consider using the HSR on products with a nutrition information panel. Food manufacturers can be urged or strongly encouraged to adopt the HSR for these products in line with the statement made under item 2c which strongly encourages use of the HSR on imported products. If the intention is for the HSR to apply equally to domestically manufactured products and imported products, consistent messaging should be used for both groups.

- Does this section provide clarity on how to implement the HSR system for your product range?
N/A

The HSR Calculator

- Does this section provide clarity around calculating the HSR for your products?
N/A
- Is there any additional information you feel would be useful to include in this section?
No

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- Is it clear from this section which category your product belongs to?
N/A

Steps to assess the HSR of a product

- Does this section make the process to obtain a HSR for your product clear?
N/A
- Are you able to access and use the HSR Calculator for your products?
N/A

On pack presentation


- Is it clear from this section how to display the HSR on your products?

The advice regarding scaling and minimum size may not be specific enough to direct food manufacturers to display the HSR in proportion to other graphics on packaging. For example, manufacturers may allocate a large proportion of packaging design to graphics and messages to make the product visually appealing and promote health claims so that it stands out against competitor products. The space left may not allow for a prominent position for the HSR, particularly given that there is no positioning requirement beyond including the HSR on front of pack or equivalent depending on how the product sits on a shelf. Suggested alternative wording:

The HSR system graphic can be scaled according to packaging size, provided that it remains legible, identifiable and relative to other graphics and messaging.

Should you have any further questions in relation to this matter, please do not hesitate to contact Dr Mikaela Chinotti, ADA Oral Health Promoter on mikaela.chinotti@ada.org.au.

Yours sincerely



Dr Carmelo Bonanno
President