

5 June 2020

Front-of-Pack Labelling Secretariat  
Department of Health, MDP 707  
GPO Box 9848,  
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Australia

Via email: [frontofpack@health.gov.au](mailto:frontofpack@health.gov.au)

Dear Sir/Madam

**RE: Implementation of changes resulting from the *Health Star Rating System Five Year Review***

Thank you for providing the Australian Dental Association (ADA) with the opportunity to contribute to the Implementation of changes resulting from the Health Star Rating System Five Year Review. The following statements are in response to the questions raised.

Noting the voluntary nature of the system, does a start date for implementation of 1 October 2020 have any implications for you given:

- i. the modifications (resulting from recommendations agreed in-principle) outlined in the attached information? *Please refer to Calculator 1.***

Recommendation 4b: A 25-point scale for total sugars proposed in Calculator 1 is an inadequate change, affecting only 5% of products. Health Star Ratings (HSRs) that do not appropriately penalise sugar given its impact on health would undermine objectives of the HSR system and current review.

Excessive added sugar consumption is highly detrimental to health. Sugar is implicated in many health conditions and diseases. It can cause tooth decay, obesity, and increase the risk of developing cancer and chronic diseases such as type 2 diabetes.<sup>1,2,3</sup> These issues create significant burden on the healthcare system and have extensive socio-economic impacts.<sup>2</sup>

Consumers looking to make healthy choices must rely on product labelling to do so. Added sugar that is not obvious (hidden sugar) can be a major contributor to sugar intake.<sup>2,4</sup> Most processed foods contain hidden sugars, even those that are considered savoury.<sup>4</sup> It is difficult for consumers to use current labelling effectively to understand products' added sugar quantity, distinguish between naturally occurring and added sugar, and manage daily intake.<sup>5,6</sup> The ingredient list often includes forms of sugar that are unfamiliar to consumers.<sup>4,5</sup>

Front of pack labelling must give an accurate picture of products' nutrient profile, recognising that sugar is one of the ingredients that is most detrimental to health and is often disguised.

Recommendation 5: Unsweetened carbonated water with a score of 4.5, only just lower than the HSR of 5

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awarded to water, does not accurately depict that these drinks can be damaging to teeth with the pH of carbonated water being 3-4.

**ii. the additional modifications outlined in the attached information? *Please refer to Calculator 2.***

A 30-point scale for total sugars proposed in calculator 2 will penalise sugar more appropriately. This will lead to HSR changes in 14% of products, almost three times more than what is proposed in calculator 1. Strengthening sugar penalisation is important to ensure that HSRs accurately represent products' nutritional profile. This change is key in HSR System reform.

Under proposed changes to the calculator (recommendation 4d from the HSR Five Year Review Report), some items containing beneficial nutrients such as dairy based desserts have been placed in category 2D, 'Dairy foods'. The ADA supports unsweetened dairy consumption as part of a healthy diet that promotes good oral health, however dairy based desserts are an example of products that may receive higher HSRs without adequate sugar penalisation.

**iii. the context of the COVID-19 pandemic?**

**Please describe the nature of any impacts.**

The ADA supports the proposed start date for a revised HSR System from 1 October 2020.

Comments regarding COVID-19:

- Major supermarkets have reported record sales with a change in consumer habits including surge buying. There has been a trend towards buying packaged food items due to their longevity and uncertainty of future access to these items during the pandemic.<sup>7</sup>
- More people are at home due to activity restrictions, changes to working arrangements and keeping children home from school or childcare.<sup>8</sup> Restaurants and cafes are less accessible, driving consumers to eat at home more regularly.
- Consumers are more likely to make quick purchase decisions to avoid spending too much time food shopping. Some state Governments have advised shoppers to limit the amount of time spent in food stores and avoid bringing additional people unnecessarily.<sup>9</sup> Online shopping is also a challenge as products' nutrition information is not always available, with only the front of packaging visible.
- The key health objective of the HSR system is to help consumers understand which foods may contribute to diet related chronic diseases. Those with chronic diseases are more vulnerable to the effects of COVID-19 and it is likely that the disease will be present in Australia for the foreseeable future. Helping consumers to maintain good health and prevent chronic disease is a high priority in this environment.
- Lack of dental care access from March to May 2020 due to dental treatment restrictions, the economic impact of COVID-19 and recent healthcare avoidance trends make preventive initiatives such as an improved HSR system more important than ever.<sup>10,11</sup>

Comments regarding the two-year implementation timeframe:

- Not all products currently displaying a HSR will be subject to changes, which will reduce the impact on manufacturers

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- Manufacturers have known about the five-year review since implementation of the HSR System in 2014, and stakeholder consultation commenced in 2017. Changes to sugar calculation were indicated from 2018, which gives manufacturers up to four years to plan and implement changes.
  - The timeframe allows manufacturers to start to create a framework to apply HSRs to all products to prepare for a potential future mandatory system. The Forum should encourage this to meet and exceed the uptake target of 70%.
  - The timeframe allows time to plan for product reformulation to gain higher HSRs. The current voluntary system means that manufacturers have several years to do this if they choose to.

Comments regarding a future mandatory HSR System:

- A strategy to implement a mandatory system is needed as one of the key objectives of the HSR is to enable direct comparison between products. This cannot be fully met if a third of products do not contain HSRs, providing the five-year 70% uptake target is reached by 2025.
- A mandatory system is needed to avoid a trend of manufacturers removing HSRs from their products if their current rating decreases. This is a risk of allowing self-regulation where manufacturers' decisions to display HSRs are largely sales driven.
- All current State and Territory public health and wellbeing plans include healthy eating, obesity prevention and enabling people to live healthy lives as key priority areas. Strong recommendations to avoid added sugar consumption to prevent disease are made in the Australian Dietary Guidelines and by the World Health Organization.<sup>1,2</sup> It is in both the national and global interest that consumers are empowered to make healthy food choices, supported by a reliable HSR system applied to all packaged products.

Should you have any questions in relation to the comments provided please do not hesitate to contact Dr Mikaela Chinotti on 02 8815 3300 or [mikaela.chinotti@ada.org.au](mailto:mikaela.chinotti@ada.org.au).

Yours sincerely



Carmelo Bonanno  
Federal President

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