

December 2018

Public consultation on the Health Star Rating system review (2)

In 2017, stakeholders were invited to provide feedback as part of a five year review of the Health Star Rating (HSR) system. See the ADA submission [here](#).

Further feedback is sought from stakeholders on options for improvement of the HSR system. These options are outlined in the [Five Year Review of the Health Star Rating system - Consultation Paper: Options for System Enhancement](#) (see chapter 4 – risk nutrients).

1. Fresh or minimally processed fruits and vegetables

1.1. What is your preferred option?

- A. Status quo for fruits and vegetables
- B. All fresh and minimally processed fruits and vegetables automatically receive an HSR of 5**
- Alternative option - please describe in Additional comments

1.2. Additional comments, e.g. likely impact/s of the option/s, description of alternative option, etc.

Australians do not consume sufficient fresh fruit and vegetables, which are essential for good health, including oral health. This measure is supported to encourage greater consumption of fruit and vegetables. An exception to the automatic Health Star Rating (HSR) of 5 may be relevant for processed fruit with added juice or syrup.

2. Non-dairy beverages

2.1. What is your preferred option?

- A. Status quo for non-dairy beverages
- B. Non-dairy beverages (other than water) may only display the energy icon
- C. Non-dairy beverages may only display the stars
- D. Non-dairy beverages are ineligible to score modifying points for their FVNL content
- E. Plain packaged water is the only non-dairy beverage to score an HSR of 5, combinations of juice and water with no other additives score an HSR of 4.5, and all other non-dairy beverages calculate their HSR using the HSR Calculator**
- Alternative option - please describe in Additional comments

2.2. Additional comments, e.g. likely impact/s of the options, description of other option, etc.

Non-dairy beverage consumption is one of the greatest contributors to added sugar consumption, and therefore a significant risk factor for tooth decay. ¹ Water is the healthiest drink option for consumers. The status quo does not adequately allow consumers to make healthy choices, as energy icons do not adequately inform consumers in the way that HSRs are designed to.

The ADA recommends a combination of Option E, which will encourage consumption of plain water, with Option C, requiring the use of Health Stars. Of course, tap water is preferred because it contains fluoride (which most bottled waters do not), and has a better environmental footprint compared to bottled water. If plain packaged water scores 5 Health Stars, this might encourage greater consumption of bottled rather than tap water.

Due to the sugar content of fruit juice, it is recommended that combinations of juice and water with no other additives score an HSR of 4 rather than 4.5. Juice is a large contributor to sugar intake in the Australian diet. ¹ Even diluted with water, fruit drinks contain moderate to high amounts of sugar. Some examples include: ²

- Golden Circle Pineapple Fruit Drink contains 20.8g sugar per serving (10.5% sugar)
- Woolworths Essentials Fruit Drink Tropical contains 19g sugar per serving (8% sugar)
- Pop Tops' Apple Fruit Drink contains 15g of sugar per serving (6% sugar)

3. Sugars

3.1 What is your preferred option? (Select one)

- A. Status quo for sugars
- B. Replace total sugars with added sugars
- C. Increase the baseline points awarded for total sugars to reduce the HSRs for products relatively high in total sugars**
- D. Remove modifying points or restrict the HSR for products relatively high in total sugars to reduce their HSRs
- Alternative option - please describe in Additional comments

3.2 Additional comments, e.g. likely impact/s of the options, description of other option, etc.

The ADA supports implementation of option C. Added sugar is a major contributor to tooth decay, which affects more than 40% of Australian children and is the leading cause of preventable hospitalisations in Australia. Reducing added sugar consumption to less than 5% of the total energy intake is the most effective way to prevent tooth decay through diet, in addition to good oral hygiene and regular dental visits. ³ Therefore, it is important

that the HSR system adequately addresses the issue of added sugar to ensure consumers can make healthy choices.

According to the mpconsulting report, an increase in points for total sugars will result in HSR decreases of between 0.5 – 1.5 HSRs for products in the following categories:

- Breakfast cereals
- Muesli and cereal bars
- Flavoured milks and yoghurts
- Dairy based desserts, cream cheeses, custards, ice creams
- Fruit drinks and soft drinks
- Dried fruits and jams

An increase from the current 22 point table to a 25 point table will affect just 5% of the products in the Technical Advisory Group (TAG) database, and is unlikely to have meaningful impact. A 30 point table will result in HSR changes to 14% of products, and is preferable as it aligns with the 30 point tables used for sodium and saturated fat.

Due to their sugar content, food and drinks in the above categories pose the biggest risk to oral and general health, and some do not routinely include the complete HSR. The 2011-12 Australian Health Survey found that 52% of added sugars in the diet came from beverages. ¹ Soft drinks, sports and energy drinks contributed most to added sugar intake at 19%. Fruit drinks and vegetable juices followed at 13% and cordial at 5%. Confectionery, cakes and muffins accounted for 9% of added sugar intake respectively.

Changes to the HSR calculator for total sugar are needed to address the significant contribution of these products to sugar intake in the Australian diet. A decrease in the HSR rating for products in these categories will make it clearer to consumers that a number of products contain moderate to high amounts of sugar, and will enable consumers to make more informed decisions. Based on self-reported data collected in a Choice consumer survey, 74% of respondents agreed or strongly agreed that the HSR helps them to make healthier food choices. ⁴ A modified HSR algorithm to better reflect the sugar content in food and drinks is likely to have a positive effect on the oral and general health of Australians.

The ADA would also support option D, to remove modifying points or restrict the HSR for products relatively high in total sugars to reduce their HSRs.

Introducing a threshold to cap HSRs for products that contain high levels of sugar to no more than three stars would be an appropriate method to reduce HSRs for high sugar products. A threshold of 22.5g of total sugar per 100g modelled on the UK Traffic Light System would assist consumers to follow the WHO recommendation to keep added sugar consumption to less than 5% of total energy intake. ³

Removing the ability to modify points to account for other nutrients including protein, fibre and/ or fruit, vegetable, nut, legume (FVNL) content would also be effective. It is evident that products containing high sugar in addition to other beneficial nutrients undeservingly receive a high HSR rating. Examples include:

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- Nestle's Milo cereal has a four star rating with 15.6g of sugar/ 3.7 teaspoons per 30g serving (52% sugar) with ½ cup reduced fat milk due to protein (7.4g), fibre (2.4g), vitamin and mineral content (30% RDI - averaged).⁵
 - Sanitarium Up&Go Liquid Breakfast Caramel has a four and a half star rating with 15.8g of sugar/ 3.8 teaspoons per serving (6.3% sugar) due to protein (8.5g), fibre (4g), vitamin and mineral content (25.5% RDI – averaged).⁶
 - Farmers Union Iced Coffee 600ml has a four star rating with 57g of sugar/ 13.4 teaspoons (9.5% sugar) due to protein (19.2g) and calcium (90% RDI) content.²
 - Carman's Super Berry muesli bars have four star rating with 6.6g of sugar/ 1.6 teaspoons (15% sugar) due to protein (5g) and fibre (3g) content.⁷

The above examples highlight how consumers can receive conflicting information from the nutrition information panel and the HSR rating, which could imply that processed products that are high in sugar are healthy. Whilst these products do have some nutritional value, it is preferable that consumers obtain more of these nutrients from whole, unprocessed foods that do not contain moderate to high levels of sugar.

Additional comments

Although the current consultation does not address whether the system should remain voluntary or mandatory, it is important to note here that if the voluntary system is maintained, then any proposed benefits of this consultation may not be seen by consumers. For example, changes to sugar may result in a reduction in stars for one third of breakfast cereals, prompting manufacturers to remove the HSRs from their packaging. Presently only 36.7% of eligible cereal and grain products display HSRs.

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1. Australian Bureau of Statistics 2016, *Australian Health Survey: Consumption of added sugars, 2011-12*, ABS, Canberra, <www.abs.gov.au/ausstats/abs@.nsf/mf/4364.0.55.011>.
 2. Woolworths 2018, *various products*, retrieved 23 November 2018, <www.woolworths.com.au>.
 3. World Health Organization 2015, *Guideline: Sugars intake for adults and children*, WHO, Geneva <www.who.int/nutrition/publications/guidelines/sugars_intake/en/>.
 4. Choice 2016, *Health Star Ratings and added sugars, a consumer perspective*, Choice, <www.choice.com.au>.
 5. Milo 2018, *Milo Cereal*, retrieved 23 November 2018, <www.milo.com.au>.
 6. Sanitarium 2018, *Up&Go Caramel Flavour*, retrieved 23 November 2018, <www.sanitarium.com.au>.
 7. Carman's 2018, *Super Berry Muesli Bars*, retrieved 23 November 2018, <www.carmanskitchen.com.au>.