

22 November 2024
318-24

Call for information: Nutrition labelling - Health Star Rating and Nutrition Information Panel

Introduction

Food Standards Australia New Zealand (FSANZ) welcomes information and evidence to help inform our nutrition labelling work on the Health Star Rating (HSR) system and the nutrition information panel (NIP).

Background

In July 2024, food ministers asked FSANZ to start preparatory work to inform ministers' future decision-making on mandating the HSR system if the final uptake target is not met by industry (i.e. 70% of intended products to display the HSR by 14 November 2025). This will facilitate an efficient process to incorporate the HSR system in the Australia New Zealand Food Standards Code (the Code) should FSANZ be asked to consider mandating the system.

Ministers also agreed to FSANZ scoping work on a holistic review of the NIP in parallel with preparatory work on the HSR system. This presents an opportunity to enhance nutrition labelling on both the front (HSR) and back (NIP) of packaged foods to support consumers to make healthy food choices and ensure these two label elements complement each other to maximise their effectiveness.

This is the first time the NIP has been reviewed in more than 20 years. Preliminary evidence indicates consumers trust and value the NIP, however often have difficulty understanding and using the information to make food choices. The review will examine the evidence and, if appropriate, identify potential improvements that may better support consumers to make healthy food choices.

Following the July 2024 Food Ministers' Meeting, FSANZ undertook initial scoping work on the NIP review with the Food Regulation Standing Committee (FRSC). Food ministers' considered the review objective, principles and proposed scope at their meeting on November 15 2024, noting the review scope may change based on any identified evidence and issues.

Principles and scope

FSANZ has established three principles to guide the evidence-based HSR and NIP review work. These are:

1. Enhance consumer use, understanding and trust in the HSR system and the NIP
2. The HSR system and the NIP complement and support each other
3. Any potential standards developed or amended are practical to implement and enforce.

The HSR preparatory work will consider how the HSR system could be included in the Code. A full review of the HSR algorithm will not be undertaken, but potential enhancements may be considered.

The NIP review will focus on the information required to be provided in the NIP and how this information is presented. The role of nutrient information in the NIP to inform and support other labelling elements (e.g. nutrition content and health claims; the HSR) will be considered. The requirements for when a NIP must be displayed is not in scope of the review. The evidence gathered for Proposal P1058 – *Nutrition labelling about added sugars*¹ on consumer use and understanding of sugars information and the NIP will be used to inform the review.

Nutrition labelling which is not the HSR or NIP will not be reviewed as part of this work (e.g. nutrition statements for infant formula products; ingredient lists; nutrition content and health claims).

Process

The HSR preparatory work and NIP review are expected to include a review of scientific evidence, consumer research, technical assessments and further public consultation.

It is anticipated that in early 2026 a report on the HSR preparatory work will accompany the results from the 2025 HSR monitoring to inform food ministers' decision-making about the future of the HSR.

Should ministers ask FSANZ to consider mandating the HSR system, and the NIP review identifies changes to the NIP are required, FSANZ would prepare proposals to amend the Code according to our usual processes.

What happens next?

A summary report will be published on the FSANZ website. Information and evidence provided by submitters and gathered independently by FSANZ will be considered in our review of the evidence for both the HSR preparatory work and the NIP review.

Questions for submitters

The following information may assist you in preparing responses to the questions below:

- [Food Ministers' Meeting communique – 25 July 2024](#)
- [Food Ministers' Meeting communique – 15 November 2024](#)
- [Health Star Rating system](#)
- [Nutrition information panels](#)

1. Do you have any information and/or evidence which may support FSANZ in undertaking the preparatory work on the HSR system?

For example, information or evidence on the following topics would be useful:

- (a) consumer use, understanding and trust in the HSR
- (b) influence of the HSR system on consumer perceptions of food and purchase intention

¹ [Proposal P1058 – Nutrition labelling about added sugars](#)

- (c) elements of the HSR that work well for consumers
 - (d) elements of the HSR that work well for industry
 - (e) challenges with consumer use of the HSR system
 - (f) challenges with industry implementation of the HSR system
 - (g) potential impact on consumers of mandating the HSR system
 - (h) potential impact on industry of mandating the HSR system (including product reformulation)
 - (i) potential impact on enforcement activities of mandating the HSR system.
2. Are there specific areas you would like FSANZ to focus on for the HSR preparatory work? If so, please explain.
 3. Do you have any information and/or evidence which may support FSANZ in undertaking the holistic review of the NIP?

For example, information or evidence on the following topics would be useful:

- (a) consumer use, understanding and trust in the NIP
 - (b) elements of the NIP that work well for consumers
 - (c) elements of the NIP that work well for industry
 - (d) elements of the NIP that work well for enforcement purposes
 - (e) challenges with consumer use of the NIP
 - (f) challenges with industry implementation of the NIP
 - (g) challenges with enforcement of the NIP or its use to support enforcement of other labelling elements
4. Are there specific areas you would like FSANZ to focus on for the review of the NIP? If so, please explain.
 5. Do you have any information or evidence that specifically considers how the HSR system and the NIP can complement and support each other? If so, please provide this.

How to provide your response

The online survey response form in [FSANZ's Consultation Hub](#) allows you to submit a response to the call for information: Nutrition labelling – Health Star Rating and Nutrition Information Panel.

Consent to collect personal information

Personal details will not be published (e.g. individual names, direct phone numbers, personal email addresses or addresses of private individuals). For information on how FSANZ manages personal information when you provide your response, see [FSANZ's privacy policy](#).

About confidential information

Under section 114 of the [Food Standards Australia New Zealand Act 1991](#), some information provided to FSANZ cannot be disclosed. We are required to treat information as confidential if it identifies trade secrets relating to food and any other information relating to food, the commercial value of which would be or could reasonably be expected to be destroyed or diminished by disclosure.

In the "Confidential Information" section, you will be asked if you have any confidential information you wish to provide. Note that you can request that any part of your response be considered confidential, and you must provide justification for why the information meets the

criteria for confidential information.

If FSANZ does not agree that the information you have requested to be confidential meets the criteria for confidential information, you will be given an opportunity to withdraw your response.

Please note, confidential information in responses may be subject to release under the provisions of the [Freedom of Information Act 1982](#).