



Health Star Rating Preparatory Work – Webinar discussion

Application of the HSR system

1 Purpose

The purpose of the webinar is to seek stakeholder views on the application of the Health Star Rating (HSR) system to foods sold in Australia and New Zealand under a mandatory scheme.

2 Introduction

2.1 Scope and principles for the preparatory work

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 target¹ is not met by industry. The scope of the work includes:

- technical assessments on key components of the HSR system,
- a literature review on consumer use, understanding and trust of the HSR system,
- consumer research (online focus groups) on use and understanding of the HSR system
- consideration of how the system could be included in the Australian New Zealand Food Standards Code (the Code),
- an assessment of the overall performance of the HSR calculator,
- the provision of HSR information in the context of online sales,
- early economics research, and
- stakeholder consultation.

As indicated by food ministers, a full review of the HSR algorithm will not be undertaken.

The work is being carried out in parallel with a review of the nutrition information panel (NIP), in recognition of the close relationship between the HSR system and the NIP, and to better support consumers to make informed food choices aligned with dietary guidelines. Both projects are guided by three principles:

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.

Potential enhancements to the HSR system may be considered should they align with the principles.

2.2 Stakeholder views

A call for information (CFI) paper was released on 22 November 2024 for an eight-week

¹ 70% of intended products to display the HSR by 14 November 2025

period to gather information, evidence and perspectives from stakeholders on both the HSR preparatory project and the NIP review project.

A 'What we heard' report² was published in March 2025 summarising the key themes from submissions, with the information and references provided being used to inform our work.

Through this process, submitters expressed differing views on how the HSR system should be applied to the food supply. We now seek to further explore stakeholder views on the application of the HSR system and discuss challenges involved with transitioning from a voluntary to a mandatory scheme.

3 Policy context and objectives underpinning the voluntary HSR system

The policy context and objectives of the HSR system summarised below are important to consider when determining how the system is applied if mandated.

3.1 Policy guidance

The *Front of Pack Labelling (FoPL) Policy Statement* (2009)³ guided the development of the HSR system. It states that a FoPL scheme should aim to support consumer choice towards healthier food options by:

- enabling direct comparisons between individual foods and increasing awareness of foods that could contribute to diet-related chronic disease;
- being consistent with other health strategies and guidelines; and
- affecting the environment in which consumers make choices.

While developed after the implementation of the HSR system, the *Policy guideline on food labelling to support consumers to make informed healthy food choices* (2020)⁴ is also relevant to the HSR preparatory work. Like the FoPL policy statement, the guideline outlines the expectation that food labels provide adequate information to enable consumers to make informed food choices to support healthy dietary patterns recommended in the dietary guidelines. One of the policy principles states such information should be provided in a format that amongst other things, *is easily accessed and understood by consumers, supports consumers to compare foods and does not promote consumption of foods inconsistent with dietary guidelines*.

3.2 Objectives and principles of the HSR system

The initial objective of a FoPL scheme was developed in 2012:

*To provide convenient, relevant and readily understood nutrition information and/or guidance on food packs to assist consumers to make informed food purchases and healthier eating choices.*⁵

² HSR and NIP webpage- <https://www.foodstandards.gov.au/consumer/labelling/hsr-nip-review>

³ [Policy statement on front-of-pack labelling | Food Regulation](#)

⁴ [Policy guideline on food labelling to support consumers to make informed healthy choices | Food Regulation](#)

⁵ The objectives and principles are available at Appendix 1 of the [Two year progress review report on the implementation of the Health Star Rating system – June 2014 – June 2016](#)

The scope specified a FoPL system would combine both interpretive and informative elements, there would be one system that was widespread and simple, and the priority focus would be packaged, manufactured or processed foods presented ready for sale to the consumer in the retail sector.

Design and implementation principles developed at this early stage supported the system objectives and policy statement.

4 Application of the voluntary HSR system

4.1 Evolution of the application of the HSR system

When the HSR system was implemented in mid-2014, guidance was provided on the intended use of the system in the *HSR System Style Guide*. It identified:

- if a food carries a NIP the use of the system should be considered
- foods exempt from carrying a NIP (such as non-nutritive foods, filled rolls/sandwiches etc., foods in small packaging), single ingredient foods that cannot be consumed alone, and fresh value-added products (packaged fruit and vegetables, meat etc.), could display the HSR, even though they were not intended or expected to use the system
- most special purpose foods (excluding formulated meal replacements and formulated supplementary foods in Standard 2.9.3), alcoholic beverages (>1.15% alcohol by volume), alcohol kits, and kava should not use the system.

Packaged water (as defined in the Code), was also considered part of the system, with an automatic five-star rating assigned to promote its hydration role consistent with the Australian Dietary Guidelines.⁶

Following the five-year review of the HSR system (the Review), updated guidance was provided reflecting the changes made to the system and to better clarify the intended use of the system. Intended foods were identified as foods that:

- are not classified as foods that must not use the HSR system; and
- are required to have a NIP; and
- can vary in nutritional composition (including foods for which composition can be altered (multi-ingredient processed packaged foods) or similar foods which can vary in composition (for example single ingredient foods such as flours, milks, edible oils and canned fruits and vegetables).

This clarification resulted in single ingredient foods⁷ not intended to be consumed alone but differing in nutrient composition (i.e. flours, oils) to shift from being 'not intended' to 'intended' foods.

Two additional policy overrides were also introduced for⁸:

⁶ Note New Zealand dietary guidelines were not referenced in the early work on the HSR system as it was undertaken before New Zealand decided to join. However, the approach is also consistent with the Eating and Activity Guidelines for Adult New Zealanders.

⁷ Amendment following webinars: This clarification was driven by the need to determine which foods should be captured for HSR uptake monitoring purposes. It was clarified that foods not varying in composition such as eggs, sugar and honey were 'permitted but not intended foods'. Flours and oils were originally considered 'intended foods' as they are required to have a NIP.

⁸ [Health Star Rating System Five Year Review Report](#)

- Unsweetened flavoured water with an automatic 4.5 stars assigned (as opposed to 2 stars using the algorithm) to ensure they were not unfairly represented as unhealthy, and to promote beverages closest in nutritional profile to water, with the same hydrating qualities and no or low kilojoules.
- Fresh and minimally processed fruits & vegetables with an automatic 5 stars assigned (as opposed to star ratings between 4 and 5 when using the algorithm) to ensure consistency across foods and to better align with dietary guidelines.

A further update was made to the application of the HSR in June 2022, to add no and low alcohol alternatives to alcoholic beverages to the list of foods that must not use the HSR system. These beverages were not considered to align with the intent of the system.

4.2 Summary of approach in style guide

The current *Health Star Rating System Calculator and Style Guide*⁹ (the Guide) categorises foods into two groups for the purpose of explaining which foods should or should not display the HSR. These are:

- 'Products intended to use the Health Star Rating system', often referred to as permitted and intended products
- 'Products that must not use the Health Star Rating system', often referred to as not permitted products.

However, there is also a third group that is not explicitly described in the Guide. These are products that are permitted to use the HSR, but for which the system was not intended. Such products are often referred to as 'permitted but not intended'.

Examples of permitted and intended, permitted but not intended and not permitted foods as described in the Guide⁸ and HSR monitoring report¹⁰ are shown in Figure 1 on the following page.

⁹ [HSR System Calculator and Style Guide v8.1.pdf](#)

¹⁰ [HSR uptake 2024 - final report](#)

Figure 1: Foods permitted and intended, permitted but not intended and foods not permitted to display the HSR graphic in the current HSR system, as outlined in the Guide and the 2024 HSR monitoring report

Permitted Intended	Permitted Not Intended	Not Permitted
<ul style="list-style-type: none"> 1) are not classified as products that must not use the HSR system; and 2) are required to have a NIP; and 3) can vary in nutritional composition (including foods which composition can be altered (multi-ingredient processed packaged foods e.g. breakfast cereal, ice cream, soft drinks) or similar foods which can vary in composition (for example single ingredient foods such as flours, milks, edible oils and canned fruits and vegetables). <p>• Policy Override:</p> <ul style="list-style-type: none"> • Unsweetened flavoured water 	<ul style="list-style-type: none"> • Products that do not require a NIP under 1.2.8—5: <ul style="list-style-type: none"> • herbs, spices or herbal infusion • vinegar or imitation vinegar • salt, or salt substitute • tea or coffee (including instant) • a substance approved as a food additive or processing aid (or sold to be used as a processing aid) • fruit, vegetables, meat, poultry and fish that comprise of a single ingredient • gelatine • water or ice • prepared filled rolls, sandwiches, bagels and similar products • jam setting compound • Foods in small packaging (i.e. less than 100cm²) • Single ingredient foods that do not vary in their nutrient composition e.g. sugar, honey, glucose, eggs, baking additives (e.g. cream of tartar, baking soda, food colouring). <p>• Policy Overrides:</p> <ul style="list-style-type: none"> • All unprocessed/minimally processed (e.g. peeled, cut, frozen) fruit and vegetables, fungi and legumes • Plain and sparkling water 	<ul style="list-style-type: none"> • Certain special purpose foods in Standard 2.9 of the Code including: <ul style="list-style-type: none"> • Infant formula (Standard 2.9.1) • Food for infants (Standard 2.9.2) • Formulated supplementary foods for young children (Standard 2.9.3 Division 4) • Formulated supplementary sports foods (Standard 2.9.4) • Foods for special medical purposes (Standard 2.9.5) • Alcoholic beverages (>0.5% ABV) • Beverages that contain less than or equal to 0.5% ABV, resemble an alcoholic beverage (in look and/or taste) and are marketed as a non-alcoholic variant or brand extension of an alcoholic beverage. • Alcohol kits • Kava

4.3 Relevant Code requirements

Consideration will need to be given to the existing relevant Code provisions that currently impact how the HSR is applied across the food supply.

Section 1.2.1—6 of the Code outlines foods that are not required to bear a label. In the current HSR system, these foods are all considered not intended to display the HSR, however industry are permitted to display the HSR if they choose.

Section 1.2.8—5 of the Code lists foods that are not required to carry a NIP, unless a claim is made. However, industry can choose to voluntarily display a NIP on these foods. In the current HSR system, these foods are treated differently. Standardised alcoholic beverages (Note: alcoholic beverages are referred to differently in the Guide), alcohol kits and kava all must not display the HSR. Other foods listed in this section of the Code are permitted to

display the HSR but are not intended to.

Section 1.2.7—4 of the Code outlines the foods where a nutrition content claim or health claim should not be made. In the current HSR system, these foods must not display the HSR.

Refer to Appendix 1 for more details of the relevant Code provisions.

5 Discussion and questions for stakeholders

5.1 Objectives and scope of HSR system

The objectives and scope of the HSR system should determine the application of the HSR system in a mandatory context. As noted above, the voluntary HSR system was initially intended for packaged, manufactured or processed foods for retail sale unless the food was specifically exempt or excluded to enable consumers to compare similar foods (sections 3.1 & 3.2). The presence of a NIP was initially used to distinguish between intended and non-intended foods. Intended foods were further clarified following the Review to capture foods that also varied in nutrient composition. Additionally, while not intended, the HSR system is being applied to unprocessed and minimally processed fruit and vegetables, meat, poultry, fish, eggs and other foods in the current voluntary system (section 4.1).

The changes to the types of foods displaying a HSR over time could be considered by some as not aligning with the original intent of the system. For example, fresh fruit and vegetables were not originally considered part of the system as they are not generally required to display a NIP and were not a 'processed' food. Alternatively, eggs were originally considered 'intended' as they carried a NIP but were later considered 'not intended' as they don't generally vary in nutrient composition. However, they still often display the HSR graphic.

Submitters to the CFI requested greater clarity on the application of the HSR system, together with the rationale, to ensure there are no unintended consequences (e.g. HSR being applied to in-store bread, foods sold from a deli) or confusion with requirements if the system were to be mandated. Submitters had differing views regarding the scope of the system and what should be considered intended or not intended under a mandatory approach as outlined in *What we heard* report¹¹ (e.g. if the HSR system is applied to eggs, a policy override of five stars should be provided; water and soluble coffee should be able to continue to display the HSR).

Based on FSANZ's work to date, there is limited consumer research investigating the impact of the HSR on different types of foods on consumer food choices. Results from an online survey¹² undertaken in 2013 before the HSR system was officially launched, indicated participants would more likely use the HSR on foods such as breakfast cereals, snacks, canned products, muesli bars, juices and breads, and less likely to use it on fresh and frozen fruit and vegetables, and raw/fresh meats, chicken, and fish.

The following questions invite stakeholder views on what the objectives and scope of a mandatory HSR system might be.

¹¹ HSR and NIP webpage- <https://www.foodstandards.gov.au/consumer/labelling/hsr-nip-review>

¹² [Quantitative Market Research Report.](#)

Questions

1. In a mandatory context, should the HSR system:

- be limited to packaged, manufactured or processed foods for retail sale (unless prohibited), consistent with the original intent of the system

OR

- continue to apply to certain unprocessed foods (e.g. fresh fruit and vegetables, water, meat and eggs) to generally promote healthy food choices, as well as packaged, manufactured or processed foods for retail sale?

2. In a mandatory context, should the system:

- only apply to foods that are required to display a NIP (with some exemptions) and that vary in nutritional composition?

OR

- is there value in also applying the HSR to foods required to have a NIP but don't substantially vary in composition (e.g. sugar, eggs, honey)?

3. Should the HSR be required on foods that voluntarily display a NIP? Why/why not?

5.2 Permitted but not intended foods

As noted above, there is a group of foods in the current voluntary system, that are 'permitted but not intended' to display the HSR (see Figure 1 and Table 1 below). These foods are largely those not required to display a NIP in accordance with section 1.2.8—5 of the Code (see Appendix 1).

Table 1: Examples of foods currently 'permitted but not intended' to use the HSR system

Foods currently classified as permitted but not intended to display the HSR	NIP Code requirements
Non-nutritive foods e.g. tea, coffee, herbs, spices, vinegar, artificial sweeteners, ice, gelatine	NIP is not required unless a claim is made. However, a NIP is not prohibited, and industry can voluntarily display a NIP.
Foods in small packaging (i.e. less than 100cm ²)	
Plain or sparkling bottled water	
Unprocessed, single ingredient meat, poultry and fish	
Unprocessed/minimally processed (e.g. peeled, cut, frozen) fruit and vegetables, fungi and legumes	
Single ingredient foods that do not vary in their nutrient composition: e.g. baking additives (cream of tartar, baking soda, food colouring etc.)	
Prepared filled rolls, sandwiches, bagels and similar products	NIP required.
Single ingredient foods that do not vary in their nutrient composition e.g. sugar, honey, glucose, eggs	

As discussed in sections 4.1 & 4.2 above, the Guide states that generally the HSR is not appropriate for use on foods exempt from displaying a NIP. However, in a mandatory system, a decision would need to be made regarding the treatment of 'permitted but not intended' foods (i.e. foods not required to display a NIP, single ingredient foods that do not vary in composition). For example, would these foods be required to display the HSR, be permitted to display the HSR voluntarily, or be prohibited from displaying the HSR.

Permitting voluntary use of the HSR in a mandated system in the Code could potentially have the advantage of generally increasing the visibility of the HSR system for consumers. It would maintain the current approach for the application of the HSR and be aligned with the regulatory approach in the Code, where NIPs can be displayed on certain foods voluntarily. A potential disadvantage is that consumers may be unable to make comparisons within some food categories as the HSR may not always be displayed, preventing consumers from making healthier food choices based on the HSR. Consumer use, understanding and trust in the overall system could therefore be reduced.

Question

4. In a mandatory system, should the HSR be required, prohibited or permitted voluntarily on foods 'permitted but not intended'? Why?

5.3 Formulated meal replacements and formulated supplementary foods

Most special purpose foods regulated under Part 2.9 of the Code must not display the HSR. The exceptions are foods regulated under Division 2 (Formulated meal replacements) and Division 3 (Formulated supplementary foods) of Standard 2.9.3. The Guide states that such foods are eligible to use the HSR system.

Section 1.1.2—3 of the Code defines a:

- **formulated meal replacement** as a food for sale or a prepackaged selection of food for sale that:
 - a) has been specifically formulated as a replacement for one or more meals of the day, but not as a total diet replacement; and
 - b) is represented as a formulated meal replacement.
- **formulated supplementary food** as a food specifically formulated as, and sold on the basis that it is, a supplement to a normal diet to address situations where intakes of energy and nutrients may not be adequate to meet an individual's requirements.

Both formulated meal replacements and formulated supplementary foods have compositional requirements for protein, energy, vitamins and minerals as set out in sections 2.9.3—3 and 2.9.3—5 respectively.

Examples of foods regulated under these divisions (as indicated on product labels) are shown below.

Table 2: Examples of foods that fall under Division 2 and Division 3 of Standard 2.9.3

Formulated Meal Replacements (Division 2)	Formulated Supplementary Foods (Division 3)
The Lady Shake/The Man Shake	Milo
Fat Blaster Weightloss Shakes	Sustagen
Celebrity Slim Meal Replacement Shakes	Up&Go

Some submitters to the CFI suggested that no special purpose foods regulated under Part 2.9 of the Code should be permitted to display the HSR because they are developed to meet specific dietary requirements for a target population and should not be compared with foods aimed for the general population. It was considered that using the HSR designed for the general healthy population on specialised products like meal replacements may not adequately reflect the complexity of these formulations, potentially misleading consumers regarding their health benefits and preventing them from making informed choices for their specific nutritional needs. There was also an alternative view that formulated supplementary sports foods should be able to display the HSR, as the HSR would enable consumers to choose healthier sports foods, encourage industry to formulate healthier foods and be consistent with the approach taken for formulated supplementary foods.

In response to submitter comments, FSANZ is considering options for the application of the HSR system to foods regulated under Divisions 2 & 3 of Standard 2.9.3 in the Code. One approach could be to permit the HSR on Division 3 foods but not permit it on Division 2 foods, given their compositional requirements and specific purpose (foods designed to support weight loss). Consumer choice in this category is more focused on energy/protein requirements in line with the foods purpose which is not the primary focus of the HSR system. Additionally, such an approach would ensure alignment with other international FoPL schemes which do not permit the display of a front-of-pack nutrition label on formulated meal replacements.

Foods regulated under Division 3 of Standard 2.9.3 could be permitted to display the HSR, given the general population is more likely to consume these foods. Whether the HSR on these foods would be required or voluntarily be permitted would be considered in the context of the broader discussion of the application of the system in a mandatory context.

Other possible approaches include prohibiting the HSR on foods regulated under both Divisions 2 & 3 of Standard 2.9.3 as the Code requirements were developed to meet certain dietary requirements or alternatively permitting voluntary use of the HSR on such foods.

Question

5. In a mandatory system, should the HSR be required, prohibited or permitted voluntarily on foods regulated under Divisions 2 & 3 of Standard 2.9.3? Why?

5.4 Foods intended to be prepared or consumed with at least one other food

Currently foods intended to be prepared or consumed with at least one other food (e.g. recipe bases, simmer sauces and pancake/cake mixes) are 'intended' foods and the HSR is determined on an 'as sold' basis.

Submitters to the CFI questioned whether these foods should have to display the HSR as their rating on an 'as sold' basis is not representative of the nutritional composition of the final product which may be confusing to consumers. Submitters considered it is unclear whether the HSR on these foods is useful to consumers.

Question

6. In a mandatory system, should foods intended to be prepared with at least one other food (e.g. recipe bases, simmer sauces, pancake or cake mixes) be required to display the HSR? Why/why not?

Appendix 1: Code requirements

1.2.1—6 When the food for sale must bear a label

- (1) If the food for sale is in a package, it is required to *bear a label with the information referred to in subsection 1.2.1—8(1) unless it:
- (a) is made and packaged on the premises from which it is sold; or
 - (b) is packaged in the presence of the purchaser; or
 - (c) is whole or cut fresh *fruit and vegetables (other than seed sprouts or similar products) in a package that does not obscure the nature or quality of the food; or
 - (d) is delivered packaged, and ready for consumption, at the express order of the purchaser (other than when the food is sold from a vending machine); or
 - (e) is sold at a *fund raising event; or
 - (f) is displayed in an *assisted service display cabinet.

1.2.7—4 Nutrition content claims or health claims not to be made about certain foods

A nutrition content claim or *health claim must not be made about:

- (a) kava; or
- (b) an infant formula product; or
- (c) a food that contains more than 1.15% alcohol by volume, other than a nutrition content claim about:
 - (i) energy content, carbohydrate content or gluten content; or
 - (ii) salt or sodium content about a food that is not a beverage.

1.2.8—5 When nutrition information panel is required

- (2) A nutrition information panel is not required for:
- (a) the following foods, unless a *claim requiring nutrition information is made in relation to the food:
 - (i) a *standardised alcoholic beverage;
 - (ii) a herb, a spice or a herbal infusion;
 - (iii) vinegar or imitation vinegar;
 - (iv) iodised salt, reduced sodium salt mixture, salt or salt substitute;
 - (v) tea or coffee, or instant tea or instant coffee;
 - (vi) a substance that is approved for use as a food additive;
 - (vii) a substance that is approved for use as a processing aid;
 - (viii) a food that is sold to be *used as a processing aid;
 - (ix) fruit, vegetables, meat, poultry, and fish that comprise a single ingredient or category of ingredients;
 - (x) gelatine;
 - (xi) water (including mineral water or spring water) or ice;
 - (xii) prepared filled rolls, sandwiches, bagels and similar products;
 - (xiii) jam setting compound;
 - (xiv) a kit which is intended to be used to produce a standardised alcoholic beverage;
 - (xv) a beverage containing no less than 0.5% alcohol by volume that is not a standardised alcoholic beverage;
 - (xvi) kava; or
 - (b) a food in a *small package, other than food for infants.