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### **Application of the Health Star Rating – discussion paper**

The George Institute for Global Health appreciates the opportunity to provide a written response to the discussion paper provided by Food Standards Australia New Zealand (FSANZ) regarding the future application of the Health Star Rating (HSR) system.

In brief, we recommend that any product displaying a Nutrition Information Panel (NIP) be required to interpret that information for consumers through the application of a HSR label on the front of pack, with the exception of products specifically excluded from the system. This approach sets clear and simple expectations, to the benefit of all stakeholders – ensuring that consumers are presented with this easy-to-understand information where it is needed, reducing the potential for confusion amongst industry, and facilitating government monitoring and enforcement activities. It also aligns with current HSR system guidance for the vast majority of products.

Brief responses to the questions within the discussion paper are at **Attachment 1**. Further detail and rationale are provided at **Attachment 2**.

The George Institute remains a strong supporter of the HSR system and we are pleased to see preparatory work to inform Food Ministers' decisions on the future of the program progress. As noted in [our response](#) to FSANZ's call for information on nutrition labelling (January 2025), we believe a mandatory, strengthened HSR on the front-of-pack remains the priority action for improving the interpretive value of food labels to promote public health and consumer objectives.

Please do not hesitate to contact me ([dmaganja@georgeinstitute.org.au](mailto:dmaganja@georgeinstitute.org.au)) or Associate Professor Alexandra Jones ([ajones@georgeinstitute.org.au](mailto:ajones@georgeinstitute.org.au)) for further information. We are also available to discuss any other opportunities to assist your important work on the future of the HSR system.

Kind regards,  
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## **Attachment 1. The George Institute's responses to questions in FSANZ's discussion paper**

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?

The HSR system should be required to be applied to all packaged products displaying a NIP, with the exception of specific excluded products. It could be voluntarily applied to products not displaying a NIP and unpackaged products, regardless of level of processing, to better inform consumers' understanding of the healthiness of those products. See Attachment 2 for more detail.

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)?

The HSR system should be required to be applied to all packaged products displaying a NIP, including products which "don't substantially vary in composition", with the exception of specific excluded products. This would ensure that consumers are consistently provided with HSRs in supermarkets, and removes any potential ambiguity for industry and monitoring agencies. See Attachment 2 for more detail.

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

Yes – the HSR system should be required to be applied to all packaged products displaying a NIP, whether as a mandatory requirement or voluntarily, with the exception of specific excluded products. Nutrition information, where provided, must be interpreted for consumers. See Attachment 2 for more detail.

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

The "permitted" and "intended" framing and terminology should not be used in the future.

Instead, the principles outlined throughout these responses and in further detail in Attachment 2 should be adopted, i.e. the HSR system should be required to be applied to all packaged products displaying a NIP, with the exception of specific excluded products, and could be voluntarily applied to products not displaying a NIP and unpackaged products.

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?

Standard 2.9.3 Division 2 products (formulated meal replacements) should be excluded from the HSR system, while Division 3 products (formulated supplementary foods) should be required to apply the HSR system in line with general requirements for other products displaying a NIP. Although both have specific compositional requirements, Division 2 products are only likely to be used by specific people for specific purposes, while Division 3 products are commonly consumed and are generally placed on shelves as equivalents to other seemingly similar, but not regulated, products. See Attachment 2 for more detail.

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?

Yes – this should align with the current “as prepared”/“as sold” rules. This issue was previously reviewed in detail, including the dedication of considerable government and stakeholder resources, and a resolution was specifically agreed by Food Ministers in 2018 and confirmed through the HSR Five Year Review. See Attachment 2 for more detail.

## Attachment 2. The George Institute's recommended approach to future application of the HSR system

Class	Detail	Rationale
Mandatory	<ul style="list-style-type: none"> <li>All packaged food and beverage products required to display a NIP</li> <li>Any packaged products voluntarily displaying a NIP</li> <li>Only products which must be               <ol style="list-style-type: none"> <li>rehydrated, diluted or mixed with water, or</li> <li>drained of water or brine</li> </ol>               before consumption and according to directions provided on product packaging may display an "as prepared" HSR; all other products must calculate a HSR "as sold"             </li> </ul>	<ul style="list-style-type: none"> <li>Largely as per current guidance</li> <li>Any product providing nutritional information to consumers is included, ensuring coverage of most commonly consumed items found on shelves and better reflecting the range of products which consumers typically see in supermarkets</li> <li>As these products already display a NIP, whether mandatory or voluntary, this imposes a reasonable requirement to interpret that information in a clear way to support consumers' decision-making</li> <li>This will set clear expectations, reducing confusion for industry and supporting compliance</li> <li>Costs are already borne by industry to display and update NIPs on these products</li> <li>Maintains current guidance on the "as prepared" issue – this matter was specifically reviewed, involving considerable policy and product analysis, government resources and stakeholder engagement, prior to the HSR 5-year review and approved by Food Ministers in 2018, and confirmed through the HSR Five Year Review and Ministers' subsequent responses in 2019/2020</li> </ul>
Voluntary	<ul style="list-style-type: none"> <li>Packaged products not required to display a NIP and not voluntarily displaying a NIP</li> <li>Unpackaged products, regardless of level of processing, may display a HSR alongside/near but clearly associated with the product</li> </ul>	<ul style="list-style-type: none"> <li>Largely as per current guidance</li> <li>These products can still choose to apply a HSR</li> <li>Plain waters and unpackaged fresh fruit and vegetables automatically score a HSR of 5, and unsweetened flavoured waters a HSR of 4.5, increasing incentives to display; many waters already apply HSRs</li> <li>Sets clear expectations and does not impose extra</li> </ul>

		requirements on industry
Excluded	<ul style="list-style-type: none"> <li>• Certain Special Purpose Foods in Part 2.9 of the Code where there are required compositional formulations, specifically:             <ul style="list-style-type: none"> <li>◦ Infant formula products – Standard 2.9.1 of the Code</li> <li>◦ Food for infants – Standard 2.9.2 of the Code</li> <li>◦ Formulated Supplementary Foods for young children – Standard 2.9.3 Division 4 of the Code (including toddler milks and formulated supplementary foods intended for young children)</li> <li>◦ Formulated meal replacements – Standard 2.9.3 Division 3 of the Code</li> <li>◦ Formulated Supplementary Sports Foods – Standard 2.9.4 of the Code</li> <li>◦ Foods for Special Medical Purposes – Standard 2.9.5 of the Code.</li> </ul> </li> <li>• Alcoholic beverages (&gt;0.5% alcohol by volume)</li> <li>• Beverages that:             <ul style="list-style-type: none"> <li>◦ Contain less than or equal to 0.5% alcohol by volume</li> <li>◦ Resemble an alcoholic beverage (in look and/or taste)</li> <li>◦ Are marketed as a non-alcoholic variant or brand extension of an alcoholic beverage. This includes, but is not limited to, beverages labelled and advertised as ‘alcohol-free’, ‘non-alcoholic’, ‘zero alcohol’, ‘de-alcoholised’ and ‘alcohol removed’.</li> </ul> </li> <li>• Alcohol kits</li> <li>• Kava</li> <li>• Products ineligible to carry nutrition content claims and health claims, as listed in Standard 1.2.7 of the Code. This includes products:</li> </ul>	<ul style="list-style-type: none"> <li>• Largely as per current guidance</li> <li>• Formulated meal replacements proposed to be newly excluded. These are largely only used by specific people for specific purposes, and have specific compositional requirements that may lead to higher HSRs but not allow meaningful differentiation between similar products – i.e. these are not generally consumed products, their consumption amongst the broader population should not be encouraged by allowing comparisons to other general purpose products via HSRs, and there is no benefit to consumers of these products in allowing HSRs on these products</li> </ul>

	<ul style="list-style-type: none"><li>○ Intended for further processing or labelled prior to retail sale</li><li>○ Delivered to a vulnerable person by a delivered meal organisation</li><li>○ Provided as an institutional meal</li></ul>	
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