

**7 May 2026**  
**393-26**

## **Call for submissions – Proposal P1067**

### **Health Star Rating System**

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FSANZ has assessed a proposal to consider amending the Australia New Zealand Food Standards Code to require foods for sale in Australia and New Zealand to display a Health Star Rating symbol. Pursuant to section 72 of the *Food Standards Australia New Zealand Act 1991* (FSANZ Act), FSANZ now calls for submissions to assist further consideration of the proposal.

For information about making a submission, visit the FSANZ website at [current calls for public comment and how to make a submission](#).

Submissions on this proposal need to be made through the [Consultation Hub](#).

All submissions on applications and proposals will be published on the Consultation Hub. We will not publish material that we accept as confidential. In-confidence submissions may be subject to release under the provisions of the *Freedom of Information Act 1982*. Submissions will be published following consultation and before the next stage in the statutory assessment process.

Under section 114 of the FSANZ Act, some information provided to FSANZ cannot be disclosed. More information about the disclosure of confidential commercial information is available on the FSANZ website at [Making a submission](#).

For information on how FSANZ manages personal information when you make a submission, see FSANZ's [Privacy Policy](#).

FSANZ also accepts submissions in hard copy to our Australia and/or New Zealand offices. There is no need to send an email or hard copy of your submission if you have submitted it through the FSANZ Consultation Hub.

### **DEADLINE FOR SUBMISSIONS: 11:59pm (Canberra time) 21 June 2026**

Submissions received after this date will not be considered unless an extension had been given before the closing date. Extensions will only be granted due to extraordinary circumstances during the submission period. Any agreed extension will be notified on the FSANZ website and will apply to all submitters.

Questions about making a submission or application and proposal processes can be sent to [standards.management@foodstandards.gov.au](mailto:standards.management@foodstandards.gov.au).

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## Supporting documents

The following documents, which informed the assessment of this proposal, are available on the [P1067 webpage](#):

SD1	Health Star Rating consumer literature review
SD2	Nutrition labelling focus groups
SD3	Performance of the Health Star Rating algorithm
SD4	Health Star Rating symbol assessment
SD5	Health Star Rating technical assessments
SD6	Preliminary consideration of costs and benefits

# Executive summary

Poor diet is a key contributor to overweight, obesity and diet-related non-communicable diseases in Australia and New Zealand. National dietary guidelines emphasise the importance of choosing a variety of nutritious foods and limiting foods high in saturated fat, sugars and sodium. Evidence assessed by Food Standards Australia New Zealand (FSANZ) indicates that front-of-pack nutrition labelling, particularly interpretive systems, can improve consumer understanding of the healthfulness of foods and support healthier choices.

The Health Star Rating (HSR) system is an interpretive front-of-pack nutrition labelling tool that summarises a food's overall nutritional profile using a simple star rating. Consumer research shows high awareness and use of the HSR. However, it also highlights limitations of the current voluntary approach, including inconsistent availability across products and variable consumer trust and understanding.

Low and selective uptake under the voluntary HSR system limits its effectiveness. Proposal P1067 – Health Star Rating System was initiated by FSANZ following a request from the Food Ministers' Meeting in February 2026 to prepare a proposal on mandating the HSR system in the Australia New Zealand Food Standards Code (the Code). The request followed voluntary uptake targets set for industry not being met.

FSANZ has assessed Proposal P1067, which considers whether the Code should be amended to require foods for sale in Australia and New Zealand to display a HSR symbol.

This 1st Call for submissions (CFS) outlines FSANZ's assessment, key conclusions and proposed regulatory approaches, and seeks stakeholder views to inform whether FSANZ should proceed to preparing a draft variation to amend the Code.

FSANZ's assessment drew on extensive preparatory work undertaken since 2024, including consumer research, technical assessments, stakeholder consultation and analysis of the performance of the HSR system. That preparatory work found no technical barriers to mandating the HSR system in the Code, subject to statutory requirements being met. However, areas were identified where changes to the voluntary system may be needed to translate the system into a mandatory regulatory framework.

The current HSR algorithm<sup>1</sup> aligns well with dietary guidelines and mandating the system is expected to improve consistency, comparability and accessibility of nutrition information. This would address limitations of the voluntary approach, enhance consumer trust and provide greater regulatory certainty for industry and enforcement agencies.

Based on the available evidence, and for reasons set out in this CFS, FSANZ's assessment concluded amending the Code to mandate the HSR system appears warranted. Proposed approaches include:

- requiring the HSR symbol to be displayed on most packaged foods for retail sale where a nutrition information panel is required, subject to specified exemptions and prohibitions
- standardising the HSR symbol design and location
- requiring the HSR to be calculated using a prescribed algorithm.

FSANZ notes the importance of consumer education to complement and support a mandatory system.

FSANZ now calls for stakeholder comment on its assessment and the proposed approaches.

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<sup>1</sup> The set of rules and calculations that determine how a HSR is to be calculated.

Submissions received will inform FSANZ's decision on whether to proceed with preparing a draft variation to amend the Code and the nature of any such amendments. Further public consultation will occur if a draft variation is prepared.

# 1 Introduction

## 1.1 The proposal

On 10 April 2026, Food Standards Australia New Zealand (FSANZ) prepared Proposal P1067 – Health Star Rating System to consider amending the Australia New Zealand Food Standards Code (the Code) to require foods for sale in Australia and New Zealand to display a Health Star Rating (HSR) symbol. The HSR system is a voluntary front-of-pack nutrition labelling tool intended to support consumers to make healthier food choices by providing a simple summary of a food’s overall nutritional profile.

## 1.2 Reasons for preparing the proposal

In February 2026<sup>2</sup> the Food Ministers’ Meeting (FMM) requested FSANZ prepare a proposal on mandating the HSR system in the Code after voluntary HSR uptake targets were not met by industry (Department of Health, Disability and Ageing, FSANZ and NZ MPI, 2026).

Diet plays an important role in our overall health and wellbeing. Food provides energy, nutrients and other components that, if provided in insufficient or excess amounts, can result in ill health (AIHW 2026a). Currently around two-thirds of the Australian (AIHW 2026b) and New Zealand (Ministry of Health 2025a) population are overweight or obese, and an estimated 15% of deaths in Australasia are attributable to dietary risks (Afshin et al. 2019).

The Australian Dietary Guidelines (ADGs) (NHMRC 2013) and Eating and Activity Guidelines for New Zealand Adults (NZEAGs) (Ministry of Health 2025b) form part of a preventative, population-level approach to promote healthy eating. Alongside dietary guidelines, tools such as nutrition labelling can assist consumers make healthier food choices.

Evidence indicates that front-of-pack labelling (FoPL) can improve consumer understanding of the nutritional content of foods and the healthfulness of food choices and purchases, compared with when no FoPL is present (Kelly et al. 2024). Interpretive FoPL systems have been found to have a greater effect on these outcomes than non-interpretive systems. There is also evidence to suggest the HSR system may encourage product reformulation to improve nutritional composition (Bablani et al. 2020).

## 1.3 Procedure for assessment

The proposal is being assessed under the Major Procedure of the *Food Standards Australia New Zealand Act 1991* (FSANZ Act), which requires 2 rounds of public consultation.

The 1st call for submissions (CFS) seeks stakeholder comment on FSANZ’s assessment and preliminary conclusions on whether to prepare a draft variation to amend the Code to mandate the HSR system, including proposed approaches.

Questions to submitters are included in the relevant supporting documents and collated in Attachment A. Submitters are asked to consider these questions when making their submission.

Any draft variation of the Code, if prepared, will be provided for comment at a second round of public consultation. Following consideration of submissions received in response to the 2nd CFS, FSANZ will decide whether to approve a final draft variation of the Code. If approved, the variation would be referred to the FMM for consideration.

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<sup>2</sup> [Food Ministers’ Meeting communiqué – 13 February 2026 | Food Regulation](#)

## 1.4 Scope of proposal

The proposal considers requiring the application of the HSR system to foods for sale in Australia and New Zealand, which would require the display of the HSR symbol in accordance with the Code.

The Health Star Rating System Implementation Guide (Implementation Guide) (Department of Health, Disability and Ageing 2025a) sets out how the current voluntary HSR system operates and applies. It provided the basis for our assessment of the HSR system.

Adjustments to the HSR system that may be necessary to align with the requirements of the Code or to improve clarity under a mandatory regulatory framework are within scope of this proposal.

Consideration of provisions for displaying the HSR in online sale environments is out of scope as FSANZ is currently undertaking a separate principles-based review of digital food labelling.

## 2 Background

### 2.1 The voluntary HSR system

The HSR system is a FoPL scheme that rates the overall nutritional profile of a food and assigns it a rating from 0.5 to 5 stars. It is intended to provide a quick, easy, standardised way for consumers to compare the nutritional value of similar foods to help them make informed food choices aligned with dietary guidelines. The higher the star rating compared to similar foods, the healthier the choice.

The system was developed in response to recommendation 50<sup>3</sup> in the *Labelling Logic: Review of Food Labelling Law and Policy Report (Blewett Review)*, released in January 2011. It is a joint New Zealand, Australian and state and territory government initiative which was developed collaboratively by technical and nutrition experts from government, industry, public health and consumer organisations. Development of the system was overseen by a Steering Committee and a Project Committee established by the Food Regulation Secretariat in 2012. A Technical Design Working Group (TDWG) was also established to research and develop the technical aspects of the system, and an Implementation Working Group (IWG) considered implementation options and frameworks for social marketing, monitoring and evaluation.

The system, endorsed by the then Australia and New Zealand Ministerial Forum on Food Regulation (now the FMM) in June 2014, was to be implemented in Australia and New Zealand on a voluntary basis for an initial five years.

Under the voluntary system, a HSR is calculated using an algorithm, with each food assigned to one of 6 categories to enable better differentiation of similar foods and closer overall alignment with dietary guidelines. Ratings are calculated using components of food considered to both increase the risk of chronic disease (energy, saturated fat, total sugars and sodium) and decrease the risk of chronic disease (protein, dietary fibre and fruit, vegetable, nut, and legume (FVNL) content (known as modifying points).

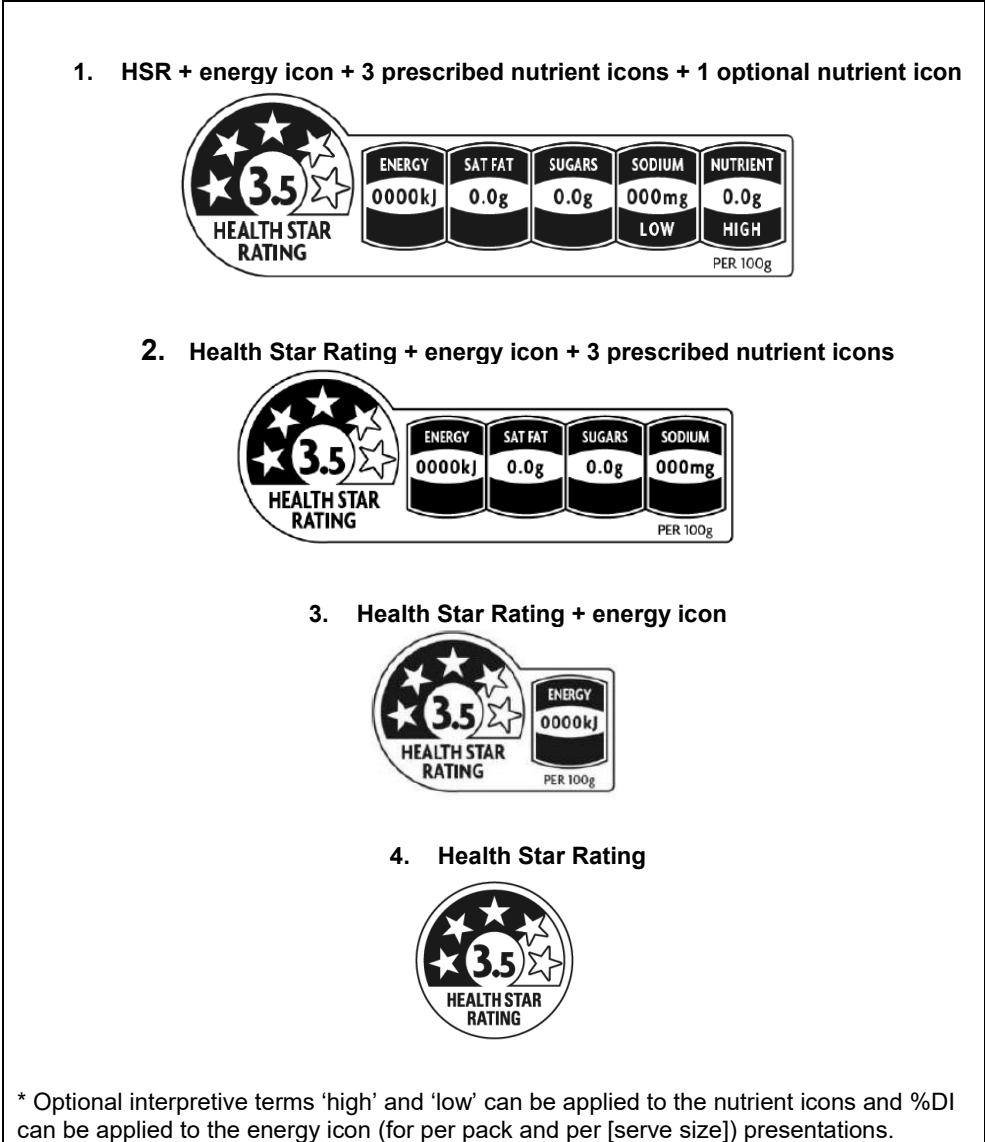
A HSR symbol is recommended to be displayed following a hierarchy of format options, with

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<sup>3</sup> Recommendation 50: *That an interpretative front-of-pack labelling system be developed that is reflective of a comprehensive Nutrition Policy and agreed public health priorities.*

all options displaying the stars element (Figure 1).

**Figure 1: Hierarchy of HSR symbol designs\***



Reviews were undertaken 2 years (2016) and 5 years (2019) (the 5-year review) after implementation (Department of Health, Disability and Ageing 2025b). No changes were made to the system following the two-year review. However, in December 2019, ministers agreed to the five-year review recommendations and a package of updates which were implemented in 2020. At this time, ministers also agreed for the system to remain voluntary but with clear uptake targets set. If the final target was not met by industry, ministers would consider mandating the system.

**2.2 HSR preparatory work**

At the July 2024 FMM<sup>4</sup>, ministers requested FSANZ undertake preparatory work on the potential mandating of the HSR system. This work was intended to inform future decision-making should the final voluntary uptake targets for November 2025 (70% of foods intended to display the HSR) not be met by industry. The preparatory work was undertaken in parallel with a holistic review of the nutrition information panel (NIP) and was intended to provide an

<sup>4</sup> [FMM Communique July 2024](#)

efficient process for incorporating the HSR system into the Code if FSANZ was asked to consider mandating the system.

The preparatory work was guided by 3 principles:

1. Enhance consumer use, understanding and trust in the HSR system
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 scope of the preparatory work included consumer research, technical assessments including initial consideration of how the HSR system could be mandated in the Code, consideration of aspects of international FoPL schemes relevant to the HSR system, an assessment of the overall performance of the algorithm and economic analysis. As requested by ministers, a full review of the algorithm was not undertaken.

Stakeholder consultation was also undertaken, including:

- a call for information (CFI) released in November 2024 to gather evidence, information and perspectives from stakeholders on the HSR preparatory work and the NIP review
- two webinars held in August 2025, which explored views on the application of the HSR system to foods sold in Australia and New Zealand under a mandatory scheme
- discussions with a range of public health and industry stakeholders to understand key areas of interest and concern.

The preparatory work found there are no technical barriers to mandating the HSR system in the Code, subject to the requirements of the FSANZ Act being met and the outcome of the assessment required by that Act. However, some updates may be required in order to translate the voluntary system into a mandatory scheme, to align HSR system requirements with existing Code provisions and provide greater clarity. All work completed during this preparatory phase, together with information and references provided through stakeholder consultation, has informed this assessment.<sup>5</sup>

## 2.3 Dietary guidelines

The HSR system was developed to align with Australian and New Zealand dietary guidelines. Dietary guidelines provide evidence-based population health advice on healthy eating to reduce the risk of chronic diseases and improve public health outcomes. They include recommendations on the types and amounts of foods and beverages people should consume, as well as advice to limit foods and drinks high in certain nutrients and choose foods higher in others. The following sections outline the respective dietary guideline recommendations in Australia and New Zealand that are relevant to the HSR system.

### 2.3.1 Australia

The ADGs (NHMRC 2013) were last updated in 2013 and are currently under review, with updated guidelines due for publication in late 2026 (NHMRC n.d.).

Guideline 2 in the ADGs is *Enjoy a wide variety of nutritious foods from these five groups<sup>6</sup> every day:*

- plenty of vegetables, including different types and colours, and legumes/beans

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<sup>5</sup> The 2024 call for information paper, the August 2025 discussion paper and both 'What we heard' reports are available on the [FSANZ website](#).

<sup>6</sup> Referred to as 'core' foods in this report

- *fruit*<sup>7</sup>
- *grain (cereal) foods, mostly wholegrain and/or high fibre varieties*
- *lean meats and poultry, fish, eggs, tofu, nuts and seeds, and legumes/beans*
- *milk, yoghurt, cheese and/or their alternatives*<sup>8</sup>, *mostly reduced fat*

The guidelines also recommend drinking *plenty of water*, noting it is preferable for most fluid intake to come from plain water. While other beverages provide water, the ADGs suggest limiting drinks with added sugars such as sugar-sweetened soft drinks and cordials, fruit drinks, vitamin waters, energy and sports drinks.

Guideline 3 in the ADGs is *limit intake of foods containing saturated fat, added salt, added sugars and alcohol*.

The ADGs do not classify foods based on level of processing or include any recommendations specifically about ultra processed foods. However, they do recommend limiting intake of discretionary foods (energy-dense, nutrient-poor foods high in saturated fats, sugars and/or salt), which are often highly processed such as confectionery, potato chips, sweet biscuits and chocolate.

### 2.3.2 New Zealand

The NZEAGs (Ministry of Health 2020) were published in 2015 and updated in 2020 to include specific guidelines for pregnant and breastfeeding women.

Eating Statement 1 is *Enjoy a variety of nutritious foods every day including: plenty of vegetables and fruit, grain foods (mostly whole grains and those naturally high in fibre), some milk and milk products (mostly low and reduced fat), and some legumes, nuts, seeds, fish and other seafood, eggs, poultry and/or red meat with the fat removed*.

They also suggest if using plant-based milk alternatives to choose products with no added sugar and with added calcium, vitamin B12 and riboflavin.

Eating Statement 2 is *choose and/or prepare food and drinks with unsaturated fats instead of saturated fats, with little or no added sugar, that are low in salt (sodium), and that are mostly 'whole' and less processed*.

Eating Statement 3 is *Make plain water your first choice over other drinks*. Choosing water or diet drinks (with artificial sweeteners) rather than sugary drinks, juice, energy or sports drinks, cordial or powdered drinks is suggested (Eating Statement 2).

Eating Statement 4 recommends that if individuals drink alcohol, to keep intake low. It also suggests drinking low-alcohol or non-alcoholic drinks over alcoholic beverages.

The NZEAGs discuss food processing in more detail than the ADGs, with recommendations that people follow an eating pattern based mostly on whole or less processed foods, that is, rich in naturally occurring nutrients with no or very little saturated fat, added sugar and salt. The guidelines also include definitions for processed foods, less processed foods and highly processed food.

## 2.4 Front-of-pack nutrition labelling overseas

Standardised FoPL systems are increasingly being implemented by national governments to communicate the healthiness of pre-packaged foods to consumers (Acton et al. 2023).

<sup>7</sup> Includes a ½ cup serve of 100% fruit juice occasionally

<sup>8</sup> Dairy alternatives should be calcium enriched with at least 100 mg/100 mL of calcium

As of November 2024, 44 countries had a government-endorsed FoPL system. Of these, 15 countries had implemented a mandatory scheme, with the remaining schemes implemented on a voluntary basis (n = 28) or in the process of being implemented on a mandatory basis (n = 1) (Afroza et al. 2024; Global Food Research Program 2024). Additional countries were also considering implementing either mandatory or voluntary FoPL schemes as of February 2026 (Afroza et al. 2024; Global Food Research Program 2024; Centre for Indonesian Policy Studies 2025; The Times of India 2026; Food Compliance 2025; US FDA 2025). FoPL schemes include non-interpretive<sup>9</sup>, interpretive<sup>10</sup> and hybrid<sup>11</sup> systems such as Warning Labels, (Multiple) Traffic Light labelling, Healthy Choice logos, Health Star Rating and Nutri-Score (Afroza et al. 2024; Talati et al. 2019).

Internationally, there is no single consistent approach to mandatory FoPL schemes, although several South American countries have implemented broadly similar schemes. Many mandatory FoPL schemes (n = 10) are nutrient-specific interpretive<sup>12</sup> schemes that warn when foods are high in sugar, fats, sodium and/or energy<sup>13</sup>. However, there is variability in the format and nutrient thresholds used across these schemes. The remaining mandatory schemes include Nutri-Grade (n = 1), (Multiple) Traffic Light (n = 3), and Guideline Daily Amount Labels (n = 1) (Afroza et al. 2024).

The current HSR system can be considered a hybrid scheme, depending on the combination of elements used. The system centres on an interpretive summary indicator based on nutrient profiling, with the option to also include non-interpretive energy and nutrient content information (Afroza et al. 2024). There are currently no similar mandatory schemes internationally, however, the HSR system shares similarities with the voluntary Nutri-Score scheme implemented in some European countries. Nutri-Score rates the nutritional quality of food using positive and negative components, similar to the HSR system, but assigns a letter and a colour ranging from A/dark green (highest nutritional quality) to E/dark orange (lower nutritional quality) (Hercberg et al. 2021; Eurofins 2024).

In November 2025, the United Arab Emirates (UAE) published a draft regulation proposing to mandate their FoPL summary indicator scheme similar to Nutri-Score (Food Compliance 2025; Abu Dhabi Government 2024).

Further information on some international FoPL schemes is provided in Attachment B.

## **3 Evidence assessment**

### **3.1 Consumer research**

#### **3.1.1 Consumer research methods**

During the preparatory work FSANZ collated existing consumer evidence on the HSR and conducted new survey and focus group research.

A systematic literature review examined 48 publications from Australia and New Zealand

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<sup>9</sup> Provides information about a food, such as amounts of key nutrients with minimal interpretation

<sup>10</sup> May contain similar information to non-interpretive schemes (i.e. amounts of key nutrients) but also includes aids such as symbols, colour codes and graphic representations that facilitate interpretation by the consumer

<sup>11</sup> Combines non-interpretive and interpretive elements

<sup>12</sup> Includes symbols, colour codes and graphic representations that facilitate interpretation by the consumer

<sup>13</sup> Argentina, Brazil, Canada, Chile, Colombia, Israel, Mexico, Peru, Uruguay and Venezuela implement these schemes.

published between 2014 and 2025 relating to consumer use, understanding and trust of the HSR system, as well as how the HSR may impact consumer perceptions and behaviours relating to food choices (see SD1).

FSANZ also commissioned qualitative research to explore consumer use and understanding of the HSR and its interaction with the NIP. Nine focus groups (7 online, 2 in person) were held across Australia and New Zealand comprising 68 participants from diverse backgrounds (see SD2).

Consumer use, understanding and trust in the HSR were further explored between 2023 and 2025 in FSANZ's Consumer Insights Tracker (CIT), an annual survey of a nationally representative sample of 1,200 Australian and 800 New Zealand consumers. Full results from the CIT can be viewed on the FSANZ website (FSANZ 2026). The findings below also incorporate HSR consumer monitoring undertaken by FSANZ on behalf of the Department of Health, Disability and Ageing, and the Ministry for Primary Industries in 2024 and 2025, which are available on the HSR website (FSANZ 2025a, FSANZ 2025b).

### **3.1.2 Consumer research findings**

Use of the HSR has been increasing over time. Seven in 10 consumers<sup>14</sup> now use the HSR at least sometimes when shopping, and most consumers agree that the HSR makes it easier to identify healthier products. Awareness of the HSR system is greater in Australia than New Zealand but is generally high overall (85% or more).

Most consumers understand that more stars indicate a healthier product relative to a product with fewer stars. However, two thirds of consumers do not understand that the HSR should only be used to compare similar products. Māori and Pacific Peoples appear to have a poorer understanding of the HSR relative to the general New Zealand population. The format of the HSR also impacts whether consumers believe higher star rated products are healthier (see SD1 and SD4 for details).

Consumers' level of trust in the HSR is associated with their use of it. In 2024, 6 in 10 Australians and 5 in 10 New Zealanders trusted the HSR system. Understanding that the HSR is regulated, supported by government or backed by science improved trust. If consumers had seen education campaigns or seen the HSR on products they trusted, they were more likely to trust the HSR. Limited knowledge about how the star rating is calculated, believing the food industry can manipulate or purchase star ratings, or the presence of nutrition content or health claims alongside low star ratings reduced trust. Perceived alignment between star ratings and consumer understanding of product healthiness was also an influencing factor, with perceived misalignment reducing trust.

While consumers often report that the HSR has influenced their purchasing decisions, typically to encourage healthier choices, real-world data suggests the impact of the HSR (as currently implemented) on purchasing may be minimal. Lab-based experimental research suggests that the presence of the HSR increases the likelihood of consumers choosing healthy foods and decreases the likelihood of consumers choosing unhealthy foods. However, field experiments showed limited impact on purchasing decisions, except for those who were motivated to use the HSR.

The low prevalence of the HSR on food packaging may be a barrier to use. There is broad support for mandating the HSR, with consumers suggesting that doing so would increase their trust and use of the HSR (see section 4.1 of this report, SD1 and SD2 for details).

Consumers appear to use the NIP and HSR in complementary but varied ways. The HSR

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<sup>14</sup> All findings refer to Australian and New Zealand consumers unless otherwise stated.

acts as a quick visual cue, while the NIP is consulted for detail or when making quick assessments on specific nutrients of interest. When consumers saw a star rating that they disagreed with, their trust in the HSR decreased and they reverted to the NIP or ingredients list to validate their judgment. The NIP was also used to identify the healthier of two products with the same HSR score.

## 3.2 Performance of the HSR algorithm

FSANZ assessed the overall performance of the HSR algorithm against the ADGs, along with selected aspects of the algorithm to support broader technical assessments associated with this proposal (see SD3). The assessment was undertaken using data for 21,675 permitted and intended foods<sup>15</sup> in the Australian Branded Food Database (BFD) collected in late 2024. The Australian dataset was used as a proxy for the New Zealand food supply given the similarity of products across these countries.

### 3.2.1 Alignment with Dietary Guidelines

Alignment of the HSR algorithm with the ADGs was determined using a foods Core and Discretionary Classification<sup>16</sup> and HSR, which was compared to a threshold. The HSR algorithm was considered to align with dietary guidelines if a food classified as core had a HSR  $\geq 3$ , and a food classified as discretionary had a HSR  $< 3$ . These thresholds were selected for consistency with modelling undertaken for the 5-year review.

There appears to be good overall alignment of the HSR algorithm with the ADGs at 79%, although there was better alignment between the algorithm and core foods (85%) than there was with discretionary foods (73%). The HSR range in both groups was 0.5 to 5 stars, with a mean HSR of core and discretionary foods of 3.5 and 2 stars respectively.

The 15% of core foods scoring a HSR  $< 3$  and the 27% of discretionary foods scoring a HSR  $\geq 3$  were spread across multiple food categories. The most common categories for core food misalignment were cheese, fruit and/or vegetable juices, savoury biscuits, instant noodles, dried fruit, flavoured milks, dressings and plant-based milk alternatives. The most common categories for discretionary food misalignment included snack products such as potato/vegetable crisps/corn chips and snack bars, carbonated drinks, sauces and condiments, soups and stocks, canned vegetables/legumes, breakfast cereals and deli-style meats.

Misalignment of ratings with the ADGs occurred for multiple reasons including:

- some core foods having higher levels of energy, saturated fat, total sugars and sodium compared with similar core foods that are in alignment and some discretionary foods having lower levels of these components compared with similar discretionary foods that are in alignment
- the use of the Core and Discretionary Classification system beyond its original intent, with some foods that could be considered to have an unhealthy nutrient profile being classified as core and some foods that could be considered to have a healthy nutrient profile being classified as discretionary
- the impact of modifying points on some discretionary foods due to higher levels of positive components (dietary fibre, protein and FVNL)
- the use of added intense sweeteners to replace sugar in some foods.

In many cases, misalignment occurred due to a combination of these factors.

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<sup>15</sup> foods intended to display a HSR as part of the voluntary scheme

<sup>16</sup> system developed for the Australian 2023 National Nutrition and Physical Activity Study (NNPAS) to identify foods in the BFD as core and discretionary (ABS 2025)

Further modelling on the positive components in the algorithm showed they play an important role in supporting the alignment of core foods, but they also contribute to higher star ratings for some discretionary foods.

### **3.2.2 Further analysis of the algorithm**

FSANZ undertook further analysis to support consideration of definitional, implementation and enforcement issues related to the categorisation of dairy foods and dairy alternatives in the algorithm and the treatment of FVNL content.

An assessment of dairy foods and dairy alternatives indicates the algorithm continues to perform as expected for this product category. The results are consistent with current dietary guidance, with reduced-fat products generally scoring higher than full-fat equivalents, and plant-based alternatives scoring similar or lower to comparable dairy foods.

An assessment of the impact of changing the treatment of FVNL (to combine concentrated and non-concentrated FVNL) and an assessment to re-define dairy categories both indicated the proposed changes had little impact on star ratings and the overall alignment of ratings with the ADGs.

## **3.3 Evaluation of HSR symbols on labels**

FSANZ undertook two assessments to evaluate HSR symbols on packaged foods sold in Australia (see SD4). The assessments were undertaken using data for 8,335 foods in the BFD collected by FSANZ in late 2025 that displayed a HSR on pack.

### **3.3.1 HSR symbol location, placement and elements**

There were 8,112 foods (97%) displaying a HSR symbol on the front of pack (FoP) and 223 foods (3%) displaying a HSR symbol in an alternative location only. The most common position for the HSR symbol on the FoP was in the bottom half of the package (90%).

The symbol with the stars element only was most commonly used on the FoP (71%). This was followed by the symbol with prescribed nutrients (16%) and energy icon (12%) (see Figure 1 above). Only a small proportion of foods incorporated additional elements, such as 'low' or 'high' or a positive nutrient icon.

The position of the HSR symbol was consistent across most symbol types, except for the symbols with optional nutrient icons and/or additional elements which were more commonly found in the top half of the FoP, rather than the bottom half.

### **3.3.2 HSR symbol presentation and legibility**

The HSR symbols on 811 (10%) randomly selected foods from the above analysis were assessed against 10 predefined presentation and legibility criteria derived from the presentation and display recommendations within the Implementation Guide (Department of Health, Disability and Ageing 2025a). Additional descriptive features of the HSR symbol were also captured to support further contextual analysis (e.g. number of symbols in black and white, and use of nutrition content and/or health claims displayed close to symbols).

Almost three quarters (73%) of the symbols assessed were consistent with all 10 assessment criteria, with a high level of consistency achieved across each individual criterion. Most inconsistencies were associated with shape/layout/proportions, typeface and sentence case, and component spacing.

Symbols with the stars element achieved 85% overall consistency with the assessment criteria compared with 46% for all other symbol types.

Around a third of symbols were in black and white, with the remaining presented using a range of other colours. There was a higher level of consistency with all criteria for symbols with the stars element only compared with other symbol types, irrespective of whether they were presented in black and white or other colours.

Nutrition content and/or health claims were displayed next to the HSR symbol on 10% of foods assessed. Of these 96% had a HSR  $\geq 3$ .

## 4 Risk management

### 4.1 Assessment summary

Diet plays an important role in our overall health and wellbeing. Poor diet can contribute to overweight and obesity and increase the risk of diet-related non-communicable diseases. Around two-thirds of the Australian and New Zealand population are currently overweight or obese, and an estimated 15% of deaths in Australasia are attributable to dietary risks.

While nutrition labelling information (e.g. the nutrition information panel) can help consumers to make healthier food choices in line with dietary guidelines, a recent large systematic review suggests FoPL interpretive tools can better support healthier food choices (Kelly et al., 2024). While this review found there was inconsistent evidence on the best-performing FoPL system, interpretive summary indicators like the HSR system generally performed favourably compared to other FoPL systems.

The HSR system has been implemented on a voluntary basis for over 10 years. Evidence suggests consumers appreciate the simplicity of the HSR system and understand more stars indicate a healthier food relative to a food with fewer stars. Seven out of 10 consumers were found to use the HSR at least sometimes when shopping and most consumers agree that the HSR makes it easier to identify healthier foods. However, two thirds of consumers do not understand that the HSR should only be used to compare similar foods. Modelling shows there is good overall alignment of the HSR algorithm with the ADGs (see SD3).

Low uptake and selective use of the voluntary system by industry have limited effective consumer use of the system (Bablani et al. 2020). Currently, of foods intended to display the HSR, 39% in Australia and 36% in New Zealand display the HSR. Those that do are skewed towards higher ratings. The rating of foods displaying a HSR in Australia had a mean and median rating of 3 and 3.5 stars respectively<sup>17</sup>. Consumers' level of trust in the HSR also influences their use of it. Limited knowledge about how the star rating is calculated, who operates the system and believing industry can manipulate or purchase star ratings contribute to reduced trust.

Several qualitative consumer studies indicate there is broad support for mandating the HSR system (SD1). Universal application is expected to strengthen the system by improving consistency, comparability, accessibility, fairness for food manufacturers and consumer trust, particularly if overseen by a credible authority (see SD2). In survey research, most participants (62–79%) agreed they would use the HSR more if it was on most foods and drinks. However, among consumers who reported being unlikely to use the HSR, low uptake was not commonly identified as a reason (10–15%) (see SD1).

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<sup>17</sup> Based on data from the BFD for 10,764 permitted and intended foods displaying a HSR collected from brand owners and in-store collections in late 2025 to support HSR monitoring against the final uptake target.

In FSANZ's focus group study, several participants pointed out that mandating the HSR might not improve consumer confidence in and the use of the system unless other steps were also taken. Consumer education on how the system works and who oversees it and ensuring implementation costs are not passed to consumers were considered important (see SD2).

Consultation during the HSR preparatory work also suggests most public health, academic, government and consumer stakeholders support mandating the system. Some public health stakeholders oppose mandating the system as it is, believing targeted improvements are needed to better align it with the current food supply and recent evidence. Others believe a different FoPL system might be more effective. Industry stakeholders generally prefer a voluntary approach, however, some consider mandating would provide regulatory certainty and an even playing field.

Based on the evidence currently available, and for the reasons set out in this report, FSANZ concludes the HSR system should continue to be applied as opposed to a different FoPL system. Consumer awareness of the HSR system is high. There is good alignment with dietary guidelines and evidence suggests interpretative summary indicators perform better in supporting consumers to make healthier food choices than other FoPL systems. The HSR system is consistent with a policy principle in the *policy guideline on food labelling to support consumers to make informed healthy food choices* (see section 4.8.3) which states that information on food labels should take into account the nutritional content of the whole food, particularly risk nutrients identified in the dietary guidelines, so as not to mislead the consumer.

FSANZ's assessment concluded that mandating the HSR system would better support healthier food choices and thereby assist in addressing the public health issues identified above, compared to a voluntary system. A mandatory approach would enable consumers to compare the HSR of most packaged foods and would likely help build trust. Additionally, it would provide regulatory certainty for industry and enforcement. However, consumer education would be needed to complement and support a mandated system (see section 5.1 of this report).

Proposed regulatory approaches for how the HSR system might be mandated by and incorporated into the Code are summarised below and discussed in detail in SD4 and SD5.

Information and supporting evidence received in submissions and further assessment will inform our decision on whether to prepare amendments to the Code to mandate the HSR system and, if so, the form those amendments would take.

## **4.2 Application of the HSR System**

### **4.2.1 Specific types of sales**

FSANZ has considered whether, under a mandatory system, the HSR system should be required, could be provided voluntarily, or should be prohibited, for specific types of sales including retail sales, sales to caterers<sup>18</sup> and intra-company transfers<sup>19</sup>.

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<sup>18</sup> caterer means a person, establishment or institution (for example, a catering establishment, a restaurant, a canteen, a school, or a hospital) which handles or offers food for immediate consumption (section 1.2.1—2).

<sup>19</sup> intra-company transfer means a transfer of a food between elements of a single company, between subsidiaries of a parent company or between subsidiaries of a parent company and the parent company.

For the reasons set out in SD5, FSANZ is proposing a HSR symbol:

- would be required for food for retail sale that is required to bear a label, subject to certain exemptions and prohibitions (see section 4.2.2. below)
- would not be required, but could be provided voluntarily, for food sold to a caterer, other types of sales (not including retail sale) and intra company transfers.

Regardless of the type of sale and whether the HSR is required or voluntarily provided, it would need to meet any calculation, format and legibility requirements.

See section 2.1 in SD5 for further details.

#### **4.2.2 Application of the HSR to foods for retail sale**

FSANZ proposes to align HSR and NIP requirements as closely as possible. As a general rule, if a food is required to display a NIP under the Code, the HSR symbol would also be required to be displayed, unless specifically prohibited. Where a NIP is provided voluntarily, a HSR symbol may also be provided voluntarily, unless prohibited (e.g. alcoholic beverages).

For the reasons set out in SD5, FSANZ is proposing:

##### ***A HSR symbol be required for:***

- foods for retail sale where a NIP is required, unless prohibited. This includes:
  - foods that do not vary in nutrient composition
  - foods required to bear a NIP because a nutrition content or health claim is made
  - imported foods.
- packaged water that receives an automatic HSR (see section 4.3.5), despite not being required to be labelled with a NIP.

##### ***A HSR symbol be permitted voluntarily for:***

- foods where a NIP is provided voluntarily, including:
  - packaged foods not required to bear a label and/or exempt from NIP requirements (including brewed soft drinks)
  - foods in hampers
  - unpackaged foods.
- fresh and minimally processed fruit, vegetables, legumes and fungi, without needing to display a voluntary NIP, that receive an automatic HSR (see section 4.3.5).

##### ***A HSR symbol be prohibited for:***

- special purpose foods
- standardised alcoholic beverages
- beverages containing  $\geq 0.5\%$  alcohol by volume (ABV) that are not standardised alcoholic beverages and are not brewed soft drinks
- beverages containing  $\leq 0.5\%$  ABV represented as non-alcoholic extensions of alcoholic beverages (see section 2.3.6.2 in SD5)
- kits used to produce standardised alcoholic beverages
- kava
- foods delivered to a vulnerable person by a delivered meal organisation
- foods other than food in a package provided to a patient in a hospital or medical institution.

See section 2.2 of SD5 for further details.

#### **4.2.2.1 Advertising**

The HSR would be prohibited in advertising for foods that are prohibited to display a HSR. Currently in the Code, if a label on or relating to food is prohibited from including a statement, information, a design or a representation, an advertisement for that food must not include that statement, information, design or representation (section 1.2.1—23).

FSANZ proposes that if the HSR is used in advertising material (for foods not prohibited), it would need to meet the proposed requirements for calculation and design.

#### **4.2.2.2 Display either adjacent to food or on label**

FSANZ has also considered whether the HSR symbol could be provided either on the label of the food or on a label adjacent to the display of the food in the retail environment. Such an approach would provide the manufacturer the option of displaying the HSR symbol on the package or providing the HSR to the retailer for their display alongside the food.

The consumer would not be required to use a digital device to access the HSR as it would need to be immediately visible to the consumer at the time of purchase/shopping.

While the option of displaying the HSR adjacent to the food would eliminate label change costs, costs for the retailer would be incurred.

There is insufficient evidence available to support this approach as being effective in allowing consumers to access the HSR to compare foods. It is also unclear if introducing such variation in how consumers access this information would impact trust in the HSR system. Monitoring and enforcement could be more complex if authorities needed to contact the manufacturer for off-pack algorithm information used to validate the HSR (e.g. dietary fibre content). FSANZ is therefore not proposing this approach.

### **4.3 HSR algorithm**

#### **4.3.1 Calculating the HSR**

FSANZ is proposing a HSR shall be determined using the algorithm as set out at Attachment C, which incorporates amendments to aspects of the algorithm from that used for the voluntary system as explained below. FSANZ considers these proposed amendments are required to more closely align and incorporate the HSR algorithm into the Code's statutory framework. Based on the analysis undertaken in section 3.2 above, FSANZ is not proposing any further amendments to the algorithm given the HSR system's overall alignment with the ADGs.

#### **4.3.2 Algorithm categories**

Under the current voluntary system, foods are assigned to one of 6 HSR categories based on the general food type and compositional requirements. This enables different components, thresholds, points tables and scaling to be used between categories to achieve better differentiation between like foods and provide better alignment with dietary guidelines.

For the reasons set out in SD5, FSANZ is proposing to retain 6 categories in the mandatory HSR system, with categories 1, 2 and 3 identified as:

- Category 1: All beverages not captured in 1D, jellies and ice confectionery
- Category 2: Foods that do not fit in any other category

- Category 3: Fats and edible oils.

Categories 1D, 2D and 3D, specifically designed to account for the composition of dairy and dairy alternative/analogue foods, would be identified as:

- Category 1D: Milk, milk-based beverages and dairy beverage analogues derived from legumes, cereals, nuts, and/or seeds, including dried milk/milk analogues
- Category 2D: Non-frozen dairy foods, and dairy analogue foods derived from legumes, not included in category 1D or 3D
- Category 3D: Cheese and processed cheese, and cheese analogues derived from legumes.

A food could consist of a mix of different foods (e.g. dairy and soy milk) within a particular category and still remain in that category.

Dairy alternative foods or plant-based alternatives to dairy would be referred to as dairy analogues to align with terminology already used in the Code.

Kefir and other fermented milk beverages would be in Category 2D.

To qualify for Category 1D, 2D or 3D, foods would be required to be at least 75% dairy or dairy analogue. Definitions in the Code for dairy products would be used to determine what dairy foods are included in each category and permitted for the 75% rule. This would allow for the dairy food as defined in the Code to contain additional ingredients and still be captured by a dairy category, e.g. flavoured milk, cheese with herbs or spices, yoghurt with added fruit. The percentage would need to be calculated using the appropriate method in Standard 1.2.10 – Characterising ingredients and components of food.

For dairy analogues, permitted dairy analogue ingredients would not be specifically listed (as they are in the voluntary system) but would comprise part of the dairy alternative food itself, e.g. soy milk is a dairy analogue which consists of soy beans, water and permitted food additives.

FSANZ is proposing the following criteria would apply:

- to be categorised within Category 1D, calcium content would need to be  $\geq 100$  mg/100 mL or 100 g
- to be categorised within Category 2D:
  - yoghurt analogues and dairy dessert analogues derived from legumes would need to contain no less than 3.1% m/m protein derived from legumes
  - cheese analogues derived from legumes would need to contain no less than 15% m/m protein derived from legumes (and contain  $\leq 320$  mg/100 g calcium to not be in Category 3D)
- to be categorised within Category 3D, cheese or processed cheese and cheese analogues derived from legumes, would need to contain  $> 320$  mg/100 g calcium.

FSANZ is seeking views on the approaches considered for accounting for milk powder in foods in the dairy categories, including how these approaches address reconstitution and the application of the 75% rule (see section 3.1.4.4.5 of SD5 and Attachment A).

See section 3.1 of SD5 for further details.

### 4.3.3 Form of the food

For the reasons set out in SD5, FSANZ is proposing:

- a HSR would be calculated on a reconstituted basis for foods intended to be reconstituted with water before consumption
- a HSR would be calculated on a drained basis for foods intended to be drained before consumption
- a HSR would be calculated on an 'as sold' basis for all other foods not intended to be reconstituted or drained before consumption
- wording that clearly indicates the HSR relates to the food 'as drained' or 'reconstituted' would be required together with the HSR symbol for foods which have a HSR calculated on an 'as reconstituted' or 'as drained' basis.

See section 3.3 of SD5 for further details.

Note that the content of FVNL (see section 3.4.6.4) and the percentage of dairy or dairy analogue ingredients for the 75% rule (section 3.1.4.4.1) is proposed to be calculated using the appropriate method in Standard 1.2.10 – Information requirements - characterising ingredients and components of food. The use of this established method would provide clarity and parity and mean there would be no need for manufacturers to determine different percentages for the one food, i.e. one for the purposes of declaring characterising ingredients and one for the purposes of the HSR. For many foods, this would result in the same basis for the calculation as that proposed in the list above.

#### **4.3.4 Fruit, vegetable, nut and legume (FVNL) content**

The FVNL content (including spices, herbs, fungi, seeds and algae) as a percentage of the food is considered a positive component in the HSR algorithm and contributes to modifying points (see Attachment C). For the reasons set out in SD5, FSANZ is proposing:

- FVNL content could score modifying points (known as V points) in the HSR algorithm
- V points could be scored for the percentage of FVNL content of a food, including spices, herbs, fungi, seeds and algae, based on eligibility criteria
- all FVNL content, regardless of concentration level, would be considered non-concentrated FVNL
- the non-concentrated FVNL threshold and points table in the voluntary system would be used to determine V points
- the percentage of FVNL would be calculated using the appropriate calculation for determining the percentage of characterising ingredients in Standard 1.2.10.

See section 3.4 of SD5 for further details.

#### **4.3.5 Algorithm overrides for specific foods**

For the reasons set out in SD5, FSANZ is proposing a mandatory HSR system would have 3 algorithm overrides<sup>20</sup>. These algorithm overrides allow certain foods to have an automatic HSR without the need to calculate the HSR using the algorithm. The algorithm overrides would be:

- plain packaged water and carbonated water (5 stars). No additives permitted except carbon dioxide for sparkling water.
- unsweetened water-based flavoured beverages (4.5 stars). Could contain additives permitted to be used in water based flavoured drinks except for quinine, intense sweeteners, colours and food additives containing sodium. Could not contain any other

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<sup>20</sup> Algorithm overrides are called 'policy overrides' in the voluntary HSR system.

ingredients or those additives specifically permitted in electrolyte drink and electrolyte drink bases, cola type drinks (caffeine), and brewed soft drinks.

- fresh and minimally processed fruit, vegetables, fungi and legumes (5 stars). These foods could contain food additives permitted to be used in fruits and vegetables, taking into account the type of processing.

No other algorithm overrides are proposed.

See section 3.5 of SD5 for further details.

#### **4.3.6 Layers of packaging, multipacks, individual portion packs and multicomponent foods**

For the reasons set out in SD5, FSANZ is proposing:

- One HSR symbol which meets legibility requirements (section 1.2.1—24) on one layer of packaging only, would be required on the following foods:
  - single foods, including with more than one layer of packaging
  - packages that contains individual servings of the same food, intended for consumption as single portions and not intended for individual sale.
- For packages that contain individual servings of foods of different varieties or flavours, intended for consumption as single portions and that are labelled with more than one NIP, the supplier may either:
  - display one HSR symbol on the front of the package that indicates the lowest HSR of all the foods within the package, as well as separate HSR symbols presented together with the applicable NIP, or
  - display an individual HSR symbol for each food in the package, on the front of the package, together with an explanation of what food each HSR symbol applies to. This could be one HSR symbol if all foods have the same HSR.
- For packages that contain different types of foods intended to be consumed together (multicomponent foods), one HSR symbol would be displayed using the standard HSR calculation. However, the HSR for a multicomponent food containing cheese and crackers would be calculated using a weighted average formula.

For the last two points above, each HSR symbol would be required to meet the legibility requirements in section 1.2.1—24 and be required on one layer of packaging only.

See section 3.2 of SD5 for further details.

#### **4.3.7 Level of processing**

During the preparatory work, some public health, government, academic and consumer stakeholders suggested including the level of processing in the HSR algorithm.

As the level of processing (ultra-processed foods (UPFs)) is not covered in the current dietary guidelines, FSANZ is not proposing to specifically include it in the algorithm. However, we note most UPFs are high in energy, sugar, sodium and/or saturated fat and foods high in these components tend to receive low ratings under the HSR system.

## **4.4 HSR symbol, location and presentation**

### **4.4.1 HSR symbol**

For reasons set out in SD4, FSANZ is proposing the HSR system is presented to consumers using the trademarked HSR symbol and that the HSR symbol comprises the stars element only. The use of the energy and nutrient elements would not be permitted. This would result in a single, standardised format for all foods displaying a HSR symbol in a mandatory system.

See section 1.1 of SD4 for further details.

### **4.4.2 HSR symbol location**

For reasons set out in SD4, FSANZ is proposing a HSR symbol must be presented on the front of the package of food except for certain imported foods. HSR symbol(s) may also be displayed elsewhere on the label, providing the rating is the same as the rating displayed on the front of the package.

For imported foods that are re-labelled, meaning a new label is placed over incorrect information (i.e. over-sticker), FSANZ proposes the HSR symbol could be included on this new label, along with the other required information. In such cases, it would not be necessary to display the HSR symbol separately on the front of the package. This approach removes the need for an additional label or over-sticker solely for the HSR symbol on the front of the package.

See section 1.2 of SD4 for further details.

### **4.4.3 HSR symbol presentation, legibility and placement**

For reasons set out in SD4, FSANZ is proposing a HSR symbol must be displayed according to the trademarked design which would be set out in the Code. The existing legibility requirements in the Code would apply to a HSR symbol.

FSANZ would consider including best practice information on presentation and legibility in guidance documents should they be prepared.

See section 1.3 of SD4 for further details.

### **4.4.4 Colour**

During the preparatory work, some stakeholders suggested the use of colour in the HSR symbol to potentially enhance consumer understanding.

FSANZ will consider the potential use of colour for interpretive purposes further. This analysis and consideration would best be undertaken separately to this proposal after the completion of the ADG review, particularly if colour is applied to the symbol based on foods recommended in these guidelines and the NZEAGs. Consumer research would be required to inform any proposed changes, including identifying the most appropriate colour to use to support consumer understanding.

See section 1.1.6 of SD4 for further details.

## **4.5 Declaration of algorithm components**

For the reasons set out in SD5, FSANZ is proposing:

- the average quantity of dietary fibre and calcium per 100 g/100 mL and FVNL content as a percentage, be required to be displayed on the label when used in the algorithm or to determine the HSR category of the food
- information on the application of the 75% rule for determining, in part, a foods' eligibility for the dairy and dairy analogue categories be required to be provided to enforcement agencies on request.

This approach is in addition to energy and the other nutrients used in the algorithm which are already required to be declared in the NIP.

See section 4 of SD5 for further details.

## 4.6 Key changes from the voluntary system

FSANZ is proposing to make some changes to the voluntary HSR system if it is mandated in the Code. Table 1 lists the main changes for foods for retail sale (see SD4 and SD5 for further details).

**Table 1. Proposed key changes from the voluntary system – foods for retail sale**

HSR system component	Key changes from voluntary system	Section reference for rationale
Application of the HSR system	<p>Under the voluntary system, it was intended that certain foods should display a HSR symbol, some could voluntarily display a HSR symbol, and some were prohibited from displaying a HSR symbol. However, these were not legal requirements.</p> <p>Under the proposed mandatory scheme, FSANZ proposes the intent of these 3 groups would remain with the following key changes for each group described below.</p> <ol style="list-style-type: none"> <li>1. Foods that <b>are required</b> to display a HSR symbol <ul style="list-style-type: none"> <li>• Foods that do not vary in nutrient composition (and are required to bear a NIP) would require a HSR symbol.</li> <li>• Plain packaged water (despite a NIP not being required on the label) would require a HSR symbol.</li> </ul> </li> <li>2. Foods that <b>may voluntarily</b> display a HSR symbol <ul style="list-style-type: none"> <li>• foods that do not require a NIP could voluntarily display a HSR symbol, <b>only</b> if a NIP is voluntarily displayed on the label</li> <li>• brewed soft drinks (cannot display a HSR under the voluntary system if alcohol content is more than 0.5% ABV) could voluntarily display a HSR symbol.</li> </ul> </li> <li>3. Foods that <b>are prohibited</b> from displaying a HSR symbol <ul style="list-style-type: none"> <li>• Formulated supplementary foods and formulated meal replacements would be prohibited.</li> </ul> </li> </ol>	Section 2.2.6 in SD5
HSR category names	HSR category names would be updated as follows:	Section 3.1.3.3 and 3.1.4.6 in SD5

HSR system component	Key changes from voluntary system	Section reference for rationale
	<ul style="list-style-type: none"> <li>• Category 1: All beverages not captured in 1D, jellies and ice confectionery (currently Non-dairy beverages, jellies and water-based ice confections)</li> <li>• Category 1D: Milk, milk-based beverages and dairy beverage analogues derived from legumes, cereals, nuts, and/or seeds, including dried milk/milk analogues (currently Milk (defined in Standard 2.5.1 of the Code), dairy beverages and dairy alternative beverages that meet specified dairy criteria)</li> <li>• Category 2: Foods that do not fit in any other category (currently Foods)</li> <li>• Category 2D: Non-frozen dairy foods, and dairy analogue foods derived from legumes, not included in category 1D or 3D (currently Other dairy foods)</li> <li>• Category 3: Fats and edible oils (currently Oils and oil-based spreads)</li> <li>• Category 3D: Cheese and processed cheese, and cheese analogues derived from legumes (currently Cheeses)</li> </ul>	
HSR Category 1D, 2D and 3D requirements	<p><b>For Category 1D:</b></p> <ul style="list-style-type: none"> <li>• dairy beverages would need to contain <math>\geq 100</math> mg/100 mL calcium instead of 80 mg per serving</li> <li>• references to protein levels for dairy analogues would be removed</li> <li>• milk powder and buttermilk would be specifically listed in this category</li> </ul> <p><b>For Category 2D:</b></p> <ul style="list-style-type: none"> <li>• fermented milk beverages (such as kefir) and yoghurt beverages would be specifically listed in this category</li> </ul> <p><b>For Category 3D:</b></p> <ul style="list-style-type: none"> <li>• references to protein levels for dairy analogues would be removed</li> </ul> <p><b>For all categories:</b></p> <ul style="list-style-type: none"> <li>• all dairy 'alternative' foods would be referred to as dairy 'analogues' instead</li> <li>• permitted dairy and dairy alternative ingredients would no longer be listed</li> <li>• definitions in the Code would be used to determine what dairy foods are included in each category and permitted within the 75% rule (i.e. a food must contain <math>\geq 75\%</math> dairy/dairy analogue content)</li> </ul>	Sections 3.1.4.4 and 3.1.4.5 in SD5

HSR system component	Key changes from voluntary system	Section reference for rationale
Multipacks	<ul style="list-style-type: none"> <li>the calculation of dairy/dairy analogue content for the 75% rule would need to be calculated using the appropriate method in Standard 1.2.10 – Characterising ingredients and components of food.</li> </ul> <p>For packages that contain individual servings of foods of different varieties or flavours, intended for consumption as single portions and that are labelled with more than one NIP, the supplier may either:</p> <ul style="list-style-type: none"> <li>display one HSR symbol on the front of the package that indicates the lowest HSR of all the foods within the package, as well as separate HSR symbols presented together with the applicable NIP; or</li> <li>display each individual HSR symbol on the front of the package, together with an explanation of what food each HSR symbol applies to. This could be one HSR symbol if all foods have the same HSR.</li> </ul> <p>This differs to the voluntary system where suppliers may:</p> <ul style="list-style-type: none"> <li>display one HSR symbol to represent each NIP or food in the pack; or</li> <li>display one HSR symbol that represents the average nutrient content of all foods within the outer pack; or</li> <li>display the lowest HSR and indicate the foods in the pack are either equivalent to the displayed HSR or higher.</li> </ul>	Section 3.2.2 in SD5
Multicomponent foods	<p>Multicomponent foods would no longer be permitted to display multiple HSR's representing each individual component of the food.</p> <p>For packages that contain different types of foods intended to be consumed together (multicomponent foods), one HSR symbol would be displayed using the standard HSR calculation. However, the HSR for a multicomponent food containing cheese and crackers would be calculated using a weighted average formula.</p>	Section 3.2.3.4 in SD5
Form of the food	<p>For foods intended to be drained of any liquid, including oil or syrup, a HSR would be calculated on an 'as drained' basis instead of on an 'as sold' basis for foods intended to be drained of oil or syrup.</p> <p>There would be an additional requirement for wording that clearly indicates a HSR relates to the food 'as drained' or 'as reconstituted' together with the</p>	Section 3.3.6 in SD5

HSR system component	Key changes from voluntary system	Section reference for rationale
Fruit, vegetable, nut and legume (FVNL) content	<p>HSR symbol for foods which have a HSR calculated ‘as reconstituted’ or ‘as drained’.</p> <p>Concentrated FVNL would be removed from the system. All FVNL content, regardless of concentration level, would be considered non-concentrated FVNL and use the non-concentrated FVNL threshold and points table.</p>	Section 3.4.6 in SD5
Declaration of algorithm components	<p>The average quantity of dietary fibre and calcium per 100 g/100 mL and FVNL content as a percentage would be required to be displayed on the label when used in the algorithm or to determine the HSR category of the food (business are currently encouraged to list the FVNL content as a percentage in the ingredients list or to keep records to substantiate FVNL claims).</p> <p>Information on the application of the 75% rule for determining, in part, a foods’ eligibility for the dairy and dairy analogue categories would be required to be provided to enforcement agencies on request.</p> <p>FVNL content would be required to be provided on request to enforcement agencies when it is used in the HSR algorithm for foods which are not required to bear a label.</p>	Section 4.1.6 in SD5
HSR symbol	The HSR symbol would be the stars element only. No other elements currently permitted, such as energy and nutrient icons, would be permitted.	Section 1.1.6 in SD4
HSR location on pack	For imported foods that are re-labelled, meaning a new label is placed over incorrect information (i.e. over-sticker), the HSR symbol could be included on this new label, along with the other required information. In such cases, it would not be necessary to display the HSR symbol separately on the front of the package.	Section 1.2.6 in SD4

## **4.7 Risk communication**

### **4.7.1 Consultation**

Consultation is a key part of FSANZ's standards development process. FSANZ acknowledges the time taken by individuals and organisations to make submissions on this proposal. The FSANZ Board has regard to all submissions received. All comments are valued and contribute to the rigour of our assessment.

Further public consultation will occur in accordance with the FSANZ Act if, after considering submissions received in response to this call for submissions, FSANZ decides to prepare a draft variation to the Code.

The release of the 1st CFS will be notified via the FSANZ Notification Circular, media release and Food Standards News, and supported by updated website information. Following the release of the 1st CFS, FSANZ will host webinars to further engage interested parties.

### **4.7.2 World Trade Organization (WTO)**

Australia and New Zealand are members of the World Trade Organization (WTO) and therefore are legally obliged to follow the rules of WTO trade related agreements. The Technical Barriers to Trade (TBT) Agreement recognises countries' rights to adopt standards for the protection of human health at the level it considers appropriate provided that such measures are in accordance with that Agreement (WTO 1995).

As members of the WTO, Australia and New Zealand are obliged to notify WTO members where proposed mandatory regulatory measures are not substantially the same as existing international standards and the proposed measure may have a significant effect on trade.

There are overseas standards for FoPL in several countries however there is currently no international standard (see section 2.4 above). Amending the Code to require packaged foods to display a HSR symbol may have an effect on international trade because this requirement is different from requirements in other countries. Therefore, a notification to the WTO under Australia's and New Zealand's obligations under the WTO TBT Agreement has been made to enable other WTO members to comment on the proposed arrangements.

## **4.8 FSANZ Act assessment requirements**

When assessing this proposal, FSANZ had regard to the following matters prescribed in section 59 of the FSANZ Act:

### **4.8.1 Section 59 of the FSANZ Act considerations**

#### ***4.8.1.1 Consideration of costs and benefits***

FSANZ has considered the costs and benefits that may arise from the proposed measures summarised above for the purposes of meeting FSANZ Act considerations (see SD6). The FSANZ Act requires FSANZ to have regard to whether costs that would arise from the proposed measure outweigh the direct and indirect benefits to the community, government or industry that would arise from the proposed measure (paragraph 59(2)(a)).

The consideration of the costs and benefits in this section is not intended to be an exhaustive, quantitative economic analysis of the proposed measures and, in fact, most of the effects that were considered cannot easily be assigned a dollar value. Rather, the assessment seeks to highlight the potential positives and negatives of moving away from the status quo and determine whether, on balance, the community, government, and industry as a whole is likely to benefit from that move.

### **Option 1: Status quo**

The *status quo* must be considered by FSANZ in any proposal to change the Code. Under this option, the HSR system would remain voluntary and the Code would remain unchanged and would not require the HSR symbol to be displayed on foods for sale in Australia and New Zealand.

This option would not address any public health risks identified above and would also not impose any costs on industry.

### **Option 2: Amend the Code to mandate the HSR system**

Under this option, the Code would be amended to require the HSR symbol on foods for retail sale in Australia and New Zealand. FSANZ's assessment is that this would enable consumers to use the system to make healthier food choices across most packaged foods.

### **FSANZ's preliminary consideration of costs and benefits**

FSANZ is in the initial stage of this proposal and therefore has made several assumptions. SD6 outlines these assumptions, along with a break-even analysis of the estimated label change costs against the cost of overweight and obesity in Australia and New Zealand. While there are limitations conducting a break-even analysis, the analysis can provide an indication as to whether an intervention is likely to achieve a net benefit.

Submissions received will be used to inform a Consultation Regulation Impact Statement and a more comprehensive consideration of costs and benefits if, after consideration of submissions received in response to this 1st CFS, FSANZ prepares a draft variation. The Office of Impact Analysis will be consulted to confirm the adequacy of the analysis for consultation purposes.

The level of analysis that FSANZ can achieve at a 2nd CFS can be greatly improved by data, evidence and additional information from stakeholders that will be impacted by proposed changes to the Code. Specific questions for submitters are provided at Attachment A. FSANZ strongly encourages stakeholders to submit information at this 1st CFS if they are able to do so.

[Table 2](#) presents the potential impacts on stakeholder groups by a potential shift away from status quo to the preliminary regulatory approaches presented in the CFS. [Table 3](#) presents whether FSANZ expects these impacts to be quantifiable and which impacts are expected to be qualitatively analysed.

**Table 2. Impact on different stakeholder groups arising from the preliminary regulatory approach**

Stakeholder group	Impact
Consumers	<p>Consumers are supported to make informed healthier food choices.</p> <p>Improved health outcomes in Australia and New Zealand. Contributions to improved health outcomes are from:</p> <ul style="list-style-type: none"> <li>• consumers who choose healthier products by comparing products using the HSR</li> <li>• a healthier food supply if food manufacturers decide to formulate or reformulate a product to improve its HSR.</li> </ul>
Food businesses (i.e. food producers, manufacturers, and importers)	<p>Costs related to label changes for food businesses who either haven't voluntarily adopted the HSR or that require updates to their existing HSR.</p> <p>Some food importers may incur a cost of over-stickering in order to comply with the mandate.</p> <p>Transfers that might occur between industry participants where some businesses sell more and others sell less.</p> <p>As a result of having to display the HSR, a food business may choose to reformulate their product to increase its appeal or formulate new products to gain a higher HSR.</p>
Government	<p>Health system cost savings.</p> <p>Costs related to consumer education.</p> <p>Costs related to providing guidance and enforcement.</p>

**Table 3. Quantified and unquantified impacts arising from the preliminary regulatory approach**

	Stakeholder group	Impact
Quantified cost	Food businesses	<p>Costs related to label changes.</p> <p>Cost of over-stickering.</p>
Unquantified cost	Food businesses	<p>Costs related to reformulation, if a business decides to do so, or formulating new products to gain a higher HSR.</p> <p>Transfers that might occur within the industry (please note these will be benefits for some industry participants if their sales increase).</p>
	Government	<p>Costs related to consumer education.</p> <p>Costs related to providing guidance and enforcement.</p>
Quantified benefit	Consumers	Improved health outcomes in Australia and New Zealand.
	Government	Health system cost savings.
Unquantified benefit	Consumers	Consumers are supported to make informed healthier food choices.

Over 10 years, the overweight and obesity-related health costs would need to be reduced by

0.03-0.06% to offset the estimated cost of label change to display the HSR, depending on the transition period implemented. The break-even analysis indicates that mandating the HSR system in the Code is likely to achieve a net benefit. However, this analysis is limited to various assumptions made and does not consider other costs and benefits that might arise from the proposal that are discussed in SD6. Refer to section 2.10 of SD6 for more detail on this analysis.

#### **4.8.1.2 Other measures**

FSANZ has not identified other measures that would be more cost-effective than varying the Code as proposed, to address the identified risks. See section 4.1 above.

#### **4.8.1.3 Any relevant New Zealand standards**

The standards relevant to this proposal apply in both Australia and New Zealand. FSANZ is not aware of any relevant New Zealand only standards.

#### **4.8.1.4 Any other relevant matters**

Other relevant matters are considered below.

### **4.8.2 Subsection 18(1)**

FSANZ has also considered the three objectives in subsection 18(1) of the FSANZ Act during the assessment.

#### **4.8.2.1 Protection of public health and safety**

FSANZ's assessment indicates the HSR on food labels would help consumers to make informed healthier food choices in line with dietary guidelines, noting consumer education about how best to use the system would be needed. The HSR system combined with other measures, including broader nutrition education initiatives, would contribute to public health efforts to reduce the prevalence of overweight, obesity and diet-related non-communicable diseases in Australia and New Zealand.

#### **4.8.2.2 The provision of adequate information relating to food to enable consumers to make informed choices**

The proposed HSR information on food labels would provide consumers with a consistent easy-to-use nutrition information tool to support informed healthier food choices.

#### **4.8.2.3 The prevention of misleading or deceptive conduct**

FSANZ has not identified any relevant issues to date.

### **4.8.3 Subsection 18(2) considerations**

FSANZ has also had regard to:

- **the need for standards to be based on risk analysis using the best available scientific evidence**

FSANZ's risk analysis considered the best scientific information currently available, including a literature review (see SD1) and new consumer research (see SD2). FSANZ had regard to prior

assessments undertaken as part of the HSR preparatory work (see section 2.2) as well as further assessment undertaken as part of this proposal (see SDs 3, 4 and 5).

- **the promotion of consistency between domestic and international food standards**

FSANZ has considered international standards for the provision of FoPL nutrition information (see section 2.4 of this report). There is no consistency across international food standards in the provision of FoPL requirements. There are no mandatory nutrition FoPL schemes that are similar to the HSR system (i.e. based on nutrient profiling) in other countries.

- **the desirability of an efficient and internationally competitive food industry**

FSANZ does not anticipate any significant impact of the proposed approach on the efficiency and ability of Australian and New Zealand food businesses to compete in overseas markets.

- **the promotion of fair trading in food**

FSANZ has not identified any relevant issues to date.

- **any written policy guidelines formulated by the Forum on Food Regulation**

FSANZ must have regard to any written policy guidelines formulated by the FMM. There are two policy guidelines and a policy statement relevant to this proposal:

- Front of pack labelling policy statement
- Policy Guideline on Food Labelling to Support Consumers Make Informed Healthy Food Choices
- Recommended Policy Guideline on the intent of Part 2.9 – Special Purpose Foods.

A summary of these policy guidelines/statement and their relevance to the assessment is provided in the following sections. FSANZ's assessment demonstrates the HSR system is consistent with the policy guidelines/statement as set out in SD4 and SD5.

#### *Front of Pack Labelling Policy Statement<sup>21</sup>*

This ministerial policy statement recognises the importance of a preventive, population-based approach to promoting health and reducing the prevalence of diet related chronic disease.

The statement highlights that FoPL is not a stand-alone strategy for addressing and reducing the prevalence of diet related chronic diseases, but it can fit within the context of broader health strategies, by making it easier for consumers to make healthier choices.

The policy statement notes a FoPL scheme is a system that can guide consumer choice by:

- i) Enabling direct comparison between individual foods that, within the overall diet, may contribute to the risk factors of various diet related chronic diseases.*
- ii) Being readily understandable and meaningful across socio-economic groups, culturally and linguistically diverse groups and low literacy/low numeracy groups.*
- iii) Increasing awareness of foods that, within the overall diet, may contribute positively or negatively to the risk factors of diet related chronic diseases.*

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<sup>21</sup> [Policy statement on front-of-pack labelling | Food Regulation](#)

The statement also suggests that a FoPL system should be consistent with other health strategies and guidelines, particularly for guiding consumers to select foods consistent dietary guidelines.

Additionally, the policy statement advises that a FoPL scheme should affect the environment in which consumers make choices by creating a supportive environment for consumers to make healthier choices and provide incentives for improvements to the healthiness of the food supply.

*Policy guideline on food labelling to support consumers to make informed healthy food choices*<sup>22</sup>

The policy principles in this guideline refer to:

- food labels providing adequate information to enable consumers to identify foods that do and do not contribute to healthy dietary patterns recommended in the dietary guidelines.
- information enabling consumers to identify foods that contribute to healthy dietary patterns recommended in the dietary guidelines being a public health priority and therefore sits towards the mandatory end of the 'dominant mode of intervention' in the Food Labelling Hierarchy
- information that supports consumers to apply the recommendations in dietary guidelines being provided on food labels in a format which:
  - is easily accessed and understood by consumers;
  - supports consumers to manage energy intakes to assist with achieving and maintaining a healthy body weight;
  - supports consumers to compare foods;
  - does not promote consumption of foods inconsistent with dietary Guidelines (such as those high in saturated fat, added sugars, added salt and or foods with little or no nutritional value); and
  - takes into account the nutritional content of the whole food, particularly risk nutrients identified in the dietary Guidelines, so as not to mislead the consumer.

The guideline also emphasises the importance of any changes to food labelling being accompanied by consumer education to assist consumers use and understanding of the food label in the context of recommendations in dietary guidelines.

*Policy guideline on intent of Part 2.9 of the Food Standards Code – Special purpose foods*<sup>23</sup>

This guideline states that Part 2.9 – Special Purpose Foods of the Code is intended to contain food standards that prescribe specific requirements for foods processed or manufactured for use by physiologically vulnerable individuals and population sub-groups. It is noted that for the purposes of Part 2.9 physiological vulnerability relates only to situations where there is a risk of dietary inadequacy to support physical and physiological need arising from specific life stages, physical disease, disorder and disability; or physical and physiological conditions that require altered energy intake.

The specific policy principles are:

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<sup>22</sup> [Policy guideline on food labelling to support consumers to make informed healthy choices | Food Regulation](#)

<sup>23</sup> [Policy guideline on intent of Part 2.9 of the Food Standards Code - Special purpose foods](#)

- Special purpose foods should be targeted only to those population groups satisfying the definition presented in the Scope/Aim section.
- The composition of special purpose food should be consistent with the intended purpose.
- Adequate information should be provided, including through labelling and advertising of special purpose foods, to:
  - assist consumer understanding of the specific nature of the food, the intended population group and intended special purpose of the food; and
  - provide for safe use by the intended population and to help prevent inappropriate use by those for whom the special purpose food is not intended.
- Consideration, where appropriate, should be given to application of controls to restrict access to a special purpose food on the basis of risk to public health and safety.

This policy guideline is relevant to the consideration of the application of the HSR system to special purpose foods. Consistent with the intent of Part 2.9 that special purpose foods should only be targeted to physiologically vulnerable individuals and population sub-groups and that their composition be consistent with their intended purpose, FSANZ is proposing to prohibit the HSR symbol for all special purpose foods (see section 2.2.6.2.1 of SD5).

## 5 Implementation

### 5.1 Education

As noted above (see section 3.1.2), while most consumers recognise that more stars indicate healthier foods, many do not understand that the HSR should be used to compare similar foods only. Levels of trust in the system are moderate in both Australia and New Zealand. Education is therefore needed to enable and encourage consumers to use the HSR system appropriately and to support healthier choices aligned with dietary guidelines.

During the preparatory work, stakeholders across all groups agreed that government-led education programs are essential to support implementation of a mandatory HSR system and to build consumer trust. Stakeholders indicated that, without education, mandating the system would be less effective. It was suggested that education programs should explain how the HSR aligns with dietary guidelines, its objectives and intended use, how the algorithm determines star ratings, the relationship between the NIP and the HSR, and the role of government in maintaining the system. Food ministers have also highlighted the need for increased education.<sup>24</sup>

Stakeholders noted that previous education initiatives were limited in scale and funding and had minimal impact on consumers. They suggested any new initiatives should be accessible to people with varying levels of health literacy.

While education has been consistently identified as critical to the effectiveness of a mandatory HSR system, FSANZ's role in education is necessarily limited. FSANZ does not have a mandate or resources to deliver broad, ongoing public education or compliance campaigns associated with food regulation. If the HSR system were mandated, FSANZ's contribution would be focused on developing explanatory materials to support understanding of the regulatory framework and requirements under the Code. Broader public education initiatives to promote awareness, correct use and trust in the HSR would require coordination, leadership and resourcing across relevant agencies in Australia and New Zealand.

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<sup>24</sup> [Food Ministers' Meeting communiqué – 25 July 2025 | Food Regulation](#)

## **5.2 Industry guidance**

Industry stakeholders identified a need for clear guidance, particularly in relation to the application of the HSR system, symbol design and placement, and the inclusion of worked examples. Clear guidance was seen as important to reduce confusion and support compliance, especially for small businesses.

While FSANZ is responsible for developing draft regulatory measures for FMM endorsement, guidance on compliance with and enforcement of approved measures is developed and implemented through the food regulation system, including by jurisdictions and the Food Regulation Standing Committee (FRSC). Discussion with jurisdictions is therefore necessary to ensure any guidance developed is practical, nationally consistent and aligned with existing compliance and enforcement arrangements.

FSANZ would work with jurisdictions to explore the development of guidance materials that support effective and consistent implementation of any mandatory HSR requirements.

## **5.3 Governance, monitoring and review**

Stakeholders across all groups emphasised the need for independent government leadership in implementing a mandatory HSR system. Academic, public health, consumer and government stakeholders proposed establishing transparent governance arrangements and the need for independent and timely review processes to ensure the HSR system continues to align with the evolving food supply, scientific evidence and dietary guidelines.

Mandating the HSR system would address many of the points raised by stakeholders noting current governance arrangements for the voluntary system would discontinue.

Any future changes to the system including the algorithm would be considered in accordance with statutory processes set out in the FSANZ Act, either via an application or proposal. Revisions to the Australian or New Zealand dietary guidelines could be a trigger for FSANZ to assess whether a proposal should be raised to consider a change to the HSR system requirements in the Code.

## **5.4 Transitional arrangements**

A transition period would be provided for food businesses to make required labelling changes and be compliant with the Code. Providing a transition period will give businesses time to coordinate a regulatory labelling change with routine labelling updates.

If after consideration of submissions and further analysis, a draft variation is prepared, transitional arrangements would be proposed at the 2<sup>nd</sup> CFS (see SD6).

During the preparatory work, industry stakeholders suggested a transition period of 3–5 years, plus a two-year stock-in-trade period, to minimise costs associated with label changes and packaging waste. Conversely, a government stakeholder suggested it should be shortened to 1 year, given the extent of work on the system already undertaken.

## 6 References

- Abu Dhabi Government (2024) [ADQCC & ADPHC announces Nutri-Mark at ADIFE 2024: a new front of pack labelling for informed food choices](#), accessed November 2025.
- Acton RB, Rynard VL, Adams J, Bhawra J, Cameron AJ, Contreras-Manzano A, Davis RE, Jáuregui A, Sacks G, Thrasher JF, Vanderlee L, White C and Hammond D (2023) 'Awareness, use and understanding of nutrition labels among adults from five countries: Findings from the 2018-2020 International Food Policy Study', *Appetite*, 180:106311, doi: <https://doi.org/10.1016/j.appet.2022.106311>.
- Afroza U, Abrar AK, Nowar A, Sobhan SMM, Ide N and Choudhury S (2024) 'Global overview of government-endorsed nutrition labelling policies of packages foods: a document review', *Frontiers in Public Health*, 12, doi: <https://doi.org/10.3389/fpubh.2024.1426639>.
- Afshin A, Sur PJ, Fay KA, Cornaby L, Ferrara G, Salama JS, Mullany EC *et al.* (2019) 'Health effects of dietary risks in 195 countries, 1990–2017: a systematic analysis for the Global Burden of Disease Study 2017', *The Lancet*, 393(10184):1958–1972, doi: [https://doi.org/10.1016/S0140-6736\(19\)30041-8](https://doi.org/10.1016/S0140-6736(19)30041-8)
- AIHW (Australian Institute of Health and Welfare) (2026a) [Food and Nutrition Overview](#), AIHW, accessed March 2026.
- AIHW (Australian Institute of Health and Welfare) (2026b) [Overweight and obesity – Summary](#), AIHW, accessed March 2026.
- Bablani L, Ni Mhurchu C, Neal B, Skeels CL, Satub KE, and Blakely T (2020) 'The impact of voluntary front-of-pack nutrition labelling on packaged food reformulation: A difference-in-differences analysis of the Australasian Health Star Rating scheme', *PLoS Medicine*, 17(11): e1003427.
- Centre for Indonesian Policy Studies (2025) [Policy Brief no. 25 – revisiting front-of-pack nutrition labelling policies in Indonesia](#), accessed August 2025.
- Department of Health, Disability and Ageing, Food Standards Australia New Zealand (FSANZ) and New Zealand Ministry for Primary Industries (NZ MPI) (2026) [Uptake of the Health Star Rating system as at November 2025](https://www.healthstarrating.gov.au/sites/default/files/2026-02/Uptake%20of%20the%20Health%20Star%20Rating%20system%20as%20at%20November%202025.pdf). <https://www.healthstarrating.gov.au/sites/default/files/2026-02/Uptake%20of%20the%20Health%20Star%20Rating%20system%20as%20at%20November%202025.pdf>
- Department of Health, Disability and Ageing (2025a) [Health Star Rating system Implementation Guide \(Version 9\)](#), Department of Health, Disability and Ageing, accessed March 2026.
- Department of Health, Disability and Ageing (2025b) [Health Star Rating system reviews](#), Department of Health, Disability and Ageing, accessed March 2026.
- Eurofins (2024) [The Nutri-Score – all important facts and novelties at a glance](#), accessed April 2025.
- Food Compliance (2025) [MOIAT proposes regulations on requirements for the Nutri-Mark on front-of-pack labelling](#), accessed November 2025.
- FSANZ (Food Standards Australia New Zealand) (2025a) [Health Star Rating – 2024 Monitoring Consumer Research Report](#), FSANZ, Australian Government, accessed March 2026.
- FSANZ (Food Standards Australia New Zealand) (2025b) . FSANZ, Australian Government, accessed March 2026.
- FSANZ (Food Standards Australia New Zealand) (2026) [Consumer Insights Tracker](#), FSANZ, accessed March 2026.

Consumer Insights Tracker. Global Food Research Program (2024) [Front of package labels around the world](#), accessed March 2026.

Health Promotion Board (2025) [Measures for Nutri-Grade](#), accessed May 2025.

Hercberg S, Touvier M and Salas-Salvado J (2021) [The Nutri-score nutrition label](#), accessed Apr 2025.

Kelly B, Ng SH, Carrad A and Pettigrew S (2024) 'The potential effectiveness of front-of-pack nutrition labeling for improving population diets'. *Annual Review of Nutrition* 44:405-40

Ministry of Health (2025a) Annual Data Explorer 2024/25: New Zealand Health Survey [Data File]. URL: <https://minhealthnz.shinyapps.io/nz-health-survey-2024-25-annual-data-explorer/>, accessed March 2026.

Ministry of Health (2025b) [Eating and activity guidelines – Health New Zealand | Te Whatu Ora](#), Ministry of Health, accessed March 2026.

Ministry of Health (2020) [Eating and Activity Guidelines for New Zealand Adults - 2020](#), Ministry of Health, accessed March 2026.

NHMRC (National Health and Medical Research Council) (2013) [Australian-dietary-guidelines.pdf](#), NHMRC, accessed March 2026.

NHMRC (National Health and Medical Research Council) (n.d.) [Guideline development | NHMRC](#), NHMRC, accessed March 2026.

Talati Z, Egnell M, Hercberg S, Julia C and Pettigrew S (2019) 'Consumers' perceptions of five front-of-package nutrition labels: an experimental study across 12 countries', *Nutrients*, 11(8):1934, doi: <https://doi.org/10.3390/nu11081934>.

The Times of India (2026) [SC: Make front-of-pack warning labels a must on packaged food](#), accessed February 2026.

US FDA (U.S. Food and Drug Administration) (2025) [FDA issues proposed rule on front-of-package nutrition labelling](#), US FDA, accessed July 2025.

WTO (World Trade Organization) (1995) [Agreement on the Technical Barriers to Trade](#), WTO, accessed March 2026.

## Attachment A – Questions for submitters

FSANZ invites stakeholders to provide comment on FSANZ’s assessment and the proposed risk management outlined in this paper. To help facilitate this feedback, FSANZ has proposed a series of questions for submitters (see below). Responses will inform FSANZ’s decision on whether to proceed with preparing a draft variation to amend the Code and, if so, on the nature of any such amendments and consideration of associated costs and benefits.

For each of the following questions, please provide any relevant evidence to support your responses.

1. Do you support FSANZ’s assessment that mandating the HSR system would better support healthier food choices than a voluntary system (see section 4.1 of this report)? Why/why not?
2. Do you support FSANZ’s proposed approach for the application of the HSR symbol to specific types of sales, including food for retail sale (see section 4.2 of this report and section 2 of SD5)? Please provide reasons and describe any practical or implementation issues FSANZ should consider.
3. Are there specific foods for which there would be space limitations in fitting a legible HSR symbol on the label (beyond small packages <100 cm<sup>2</sup>) (see section 2.2.6.3.6 of SD5)? Please provide examples and outline any practical solutions or approaches to address these challenges.
4. Do you support FSANZ’s proposed overall approach with respect to calculating the HSR (see section 4.3.1 and Attachment C of this report)? Please provide reasons for your response, including any specific aspects of the proposed approach that you consider problematic or could be improved.
5. Do you support FSANZ’s proposed approach with respect to the categorisation of foods for the algorithm (Categories 1, 2, 3, 1D, 2D, and 3D) (see section 4.3.2 of this report and section 3.1 of SD5)? Please provide reasons for your response.
6. What are your views on the approaches considered by FSANZ for accounting for milk powder in foods in the dairy categories, including how these approaches address reconstitution and the application of the 75% rule (section 3.1.4.4.5 of SD5)? Please describe any alternative approaches that may better address the issues identified.
7. Do you support FSANZ’s proposed approach with respect to the form of the food used when calculating the HSR (see section 4.3.3 of this report and section 3.3 of SD5)? Please provide reasons for your response, including any specific aspects of the proposed approach that you consider problematic or could be improved.
8. Do you support FSANZ’s proposed approach with respect to FVNL content used when calculating the HSR (see section 4.3.4 of this report and section 3.4 of SD5)? Please provide reasons for your response, including any specific aspects of the proposed approach that you consider problematic or could be improved.
9. Do you support FSANZ’s proposed approach with respect to algorithm overrides (see section 4.3.5 of this report)? Please provide reasons for your response, including any

specific aspects of the proposed approach that you consider problematic or could be improved.

10. Do you support FSANZ's proposed approach regarding layers of packaging, multipacks, individual portion packs and multicomponent foods (see section 4.3.6 of this report and section 3.2 of SD5)? Please provide reasons for your response.
11. Do you support FSANZ's proposed approach for the HSR symbol to be the stars element only (see section 4.4.1 of this report and section 1.1 of SD4)? Please provide reasons for your response, including any evidence on consumer use or implementation considerations.
12. Do you have any information or evidence to inform the consideration of colour including as it relates to supporting consumption of foods identified in Guideline 2 of the ADGs and Eating Statement 1 of the NZEAG? Please provide any consumer evidence and/or information on implementing the use of colour in the HSR symbol.
13. Do you support FSANZ's proposed approach for the location of the HSR symbol on a package of food (see section 4.4.2 of this report and section 1.2 of SD4)? Please provide reasons for your response, including any evidence on consumer use or implementation considerations.
14. Do you support FSANZ's proposed approach for the presentation and legibility of the HSR symbol (see section 4.4.3 of this report and section 1.3 of SD4)? Please provide reasons for your response, including any evidence on consumer use or implementation considerations.
15. Do you support FSANZ's proposed approach for the declaration of algorithm components (see section 4.5 of this report and section 4 of SD5)? Please provide reasons for your response including any implications for transparency, enforcement or cost.
16. Have all the major impacts to industry, consumers and government from the proposed options been identified in Table 1 of SD6? Please provide evidence (where possible) to support the inclusion and magnitude of other impacts.
17. Do you have information to provide to assist FSANZ in quantifying the costs and benefits currently identified as unquantified in Table 2 of SD6? Please provide data and evidence to support the inclusion of such information.
18. Do you agree with the assumptions proposed to be used to estimate the costs to industry in SD6? Please provide data and evidence to support the inclusion of alternative assumptions.

## **Attachment B – International front-of-pack nutrition labelling schemes**

A summary of selected components of most international mandatory FoPL schemes is in Table 1 below. The details presented are of those most relevant to our assessment of the HSR system such as prohibitions, label format and presentation requirements.

Information about mandatory schemes in Iran, India and Thailand are not included as limited information could be identified through publicly available sources. In addition, among South American countries with mandatory FoPL schemes, only those of Ecuador, Chile, Mexico and Brazil are included, as these schemes are broadly representative of the FoPL approaches adopted across the region (Global Food Research Program 2024). Lastly, detailed information was included for the voluntary Nutri-Score system as the HSR system shares many similarities with the HSR system compared to other FoPL schemes.

**Table 1: Selected components of international FoPL schemes**

Country	Type of scheme (Afroza et al. 2024)	Nutrients involved	Intended foods	Exemptions / prohibitions	Location on package	Format (legibility, presentation, size)	Colour requirements
Ecuador	Nutrient-specific interpretive	Fat, sugar and/or salt (Afroza et al. 2024).	Processed food (Freire et al. 2016). <sup>25</sup>	Foods exempt include: <ul style="list-style-type: none"> <li>• foods containing insignificant (&lt;1 g) quantities of nutrients (carbohydrates, dietary fibre and protein)</li> <li>• dietary supplements</li> <li>• packaged foods not intended for direct consumer sale</li> <li>• fresh fruits, vegetables and seafood (USDA and GAIN 2021a).</li> </ul>	Any part of the package (Crosbie et al. 2023b).	Must be proportional in size to the package's principal panel (Freire et al. 2016).  Font type and size must be clearly legible under normal viewing conditions.  Must have significant contrast between text and background (Norma Technique Ecuadorian 2021).	Unable to specifically identify
Sri Lanka	Hybrid interpretive and non-interpretive	Sugar (USDA and GAIN 2023).	Liquid food which is in a ready to drink form and contains sugar (USDA and GAIN 2023).	Regulations do not apply to: <ul style="list-style-type: none"> <li>• foods which contain &lt;0.5 g /100 mL of sugar</li> <li>• water</li> <li>• milk</li> <li>• spices and spice mixes, food additives, flavourings, black tea, ground coffee, single ingredient herbal</li> </ul>	Main panel of the label (USDA and GAIN 2023).	Logo must be ≥ 2 cm high x 1 cm wide.  Sugar content description must be in bold white, ≥ 2 mm font size and displayed in Sinhala, Tamil and English. Sugar content value must be ≥ 1.5 mm font size and bold	Interpretive colours are pre-determined using the Red, Green, Blue (RGB) colour coded system for red, amber and green (USDA and

<sup>25</sup> Ecuador defines processed food as packaged and branded products that have been submitted to technological processes for their transformation, modification or conservation.

Country	Type of scheme (Afroza et al. 2024)	Nutrients involved	Intended foods	Exemptions / prohibitions	Location on package	Format (legibility, presentation, size)	Colour requirements
				infusion, honey, treacle, 100% glucose <ul style="list-style-type: none"> <li>• infant and follow-up formula</li> <li>• foods for special dietary purposes</li> <li>• exported foods</li> <li>• bulk packs (USDA and GAIN 2023).</li> </ul>		black (USDA and GAIN 2023).	GAIN 2023).
Canada	Nutrient-specific interpretive	Saturated fat, sugar and/or sodium (Government of Canada 2022; 2025).	Prepackaged foods containing saturated fats, sugar and/or sodium $\geq$ specified thresholds (Government of Canada 2022; 2025)	Conditionally exempt foods: <sup>26</sup> <ul style="list-style-type: none"> <li>• foods which are exempt from carrying the nutrition facts table</li> <li>• foods in subsection <u>B.01.350(6) to (12)</u> of the Food and Drug (FDR) regulations with naturally occurring saturated fat, sugars and/or sodium</li> <li>• foods that are important sources of “shortfall” nutrients such as calcium<sup>27</sup></li> <li>• foods on which the nutrition symbol would be redundant (sugar, honey, butter, maple syrup, other fats and oils).</li> </ul>	Upper half of principal display label or right half if package is wider than it is tall (Government of Canada 2023; 2025).  Specific requirements are set for other irregular shaped packages (Government of Canada 2023).	Must be proportional in size to that of the package. Specifications are described <a href="#">here</a> .  Font type: Helvetica Neue LT STD  Must be in English and French and displayed in accordance with the applicable symbol set out in <a href="#">Schedule K.1</a> of the FDR regulations (Government of Canada 2023; 2025).	Must be in black and white in alignment with the images in Schedule K.1 of the FDR (Government of Canada 2023).

Prohibited foods:

<sup>26</sup> These foods lose their exemption when they either lose their exemption for a nutrition facts table or contain ingredients with saturated fat, sugars and/or sodium.

<sup>27</sup> Shortfall nutrients are nutrients that are not readily available in other foods and are insufficient in Canadian diets.

Country	Type of scheme (Afroza et al. 2024)	Nutrients involved	Intended foods	Exemptions / prohibitions	Location on package	Format (legibility, presentation, size)	Colour requirements
				<ul style="list-style-type: none"> <li>• products intended solely for infants 6 -12 months of age</li> <li>• human milk fortifiers and substitutes (infant formula)</li> <li>• food represented as containing a human milk substitute</li> <li>• formulated liquid diets</li> <li>• meal replacements</li> <li>• nutritional supplements</li> <li>• foods represented for: <ul style="list-style-type: none"> <li>- protein-restricted diets,</li> <li>- low amino acid diets,</li> <li>- use in very low energy diets</li> </ul> </li> </ul> <p>(Government of Canada 2022; 2023).</p>			
<b>Brazil</b>	Nutrient-specific interpretive	Added sugars, saturated fat and/or sodium (Official gazette of the Union 2020).	Processed foods which contain added sugar, saturated fat and sodium in amounts greater than those specified in Annex XV of the Official Gazette of the	<p>Foods that align with the Brazilian dietary guidelines as recommended foods for a healthy diet are excluded. This includes fruit, vegetables, legumes, tubers, cereals, flours, meat, fish, eggs and cheese.</p> <p>It is prohibited on the following:</p> <ul style="list-style-type: none"> <li>• infant formula</li> </ul>	Upper half of the package's main panel (Official gazette of the Union 2020)	<p>Must be proportionate to the size of the package.<sup>29</sup></p> <p>Specific format requirements including font size, font type, positioning and size of the magnifying glass and nutrition information blocks, and distance</p>	Must be black font on white background or vice versa (Mais et al. 2022).

<sup>29</sup> As specified in [Annex XVIII of the Official Gazette of the Union Normative instruction – in No. 75/2020](#)

Country	Type of scheme (Afroza et al. 2024)	Nutrients involved	Intended foods	Exemptions / prohibitions	Location on package	Format (legibility, presentation, size)	Colour requirements
			Union Normative instruction (IN) No. 75/2020 (Official gazette of the Union 2020). <sup>28</sup>	<ul style="list-style-type: none"> <li>• milk</li> <li>• culinary ingredients (salt, olive oil, vegetable oil)</li> <li>• food supplements</li> <li>• alcoholic beverages (Official gazette of the Union 2020; Mais et al. 2022).</li> </ul>		between the information blocks are specified in Annex XVIII of the Official Gazette of the Union Normative instruction – in No. 75/2020 (Official gazette of the Union 2020).	
<b>Chile</b>	Nutrient-specific interpretive	Energy, sugars, saturated fats and/or sodium (Reyes et al. 2019).	Prepackaged foods with sugar, saturated fats, sodium and/or energy above specified thresholds (USDA and GAIN 2021b).	<p>Exemptions:</p> <ul style="list-style-type: none"> <li>• foods that are sold in bulk or portioned at the point of sale</li> <li>• foods with no added sugar, honey, syrup, sodium or saturated fats</li> <li>• foods for special dietary uses (e.g. infant formula)</li> <li>• dietary supplements and food for athletes</li> <li>• zero calorie, sugar-free sweeteners (International Trade Administration 2025; USDA and GAIN 2021b).</li> </ul>	The label's main face unless the main face is 30 – 60 cm <sup>2</sup> where it can appear on another visible face (USDA and GAIN 2021b)	Must be proportionate to the area of the label's main face (Reyes et al. 2019, USDA and GAIN 2021b).	Background must be black, with the border and text in white (USDA and GAIN 2021b)
<b>Mexico</b>	Nutrient-specific interpretive	<u>Warning labels:</u> Sugars, sodium, saturated	Domestic and imported, retail prepackaged, processed	<p>Exemptions:</p> <ul style="list-style-type: none"> <li>• culinary ingredients (e.g. salt or oil)</li> </ul>	Upper right-hand corner of principal display area unless main	Must be proportional to the size of the main display surface area (USDA 2021).	Font colour must be white on a black background or black on a

<sup>28</sup> [Annex XV of the Official Gazette of the Union Normative instruction \(IN\) No. 75/2020](#)

Country	Type of scheme (Afroza et al. 2024)	Nutrients involved	Intended foods	Exemptions / prohibitions	Location on package	Format (legibility, presentation, size)	Colour requirements
		fats, trans fats, and/or energy (Crosbie et al. 2023a)  <u>Cautionary statements:</u> Caffeine, non-nutritive sweeteners (White and Barquera 2020; USDA 2020)	foods and non-alcoholic beverages (USDA 2021).	<ul style="list-style-type: none"> <li>products aimed at children younger than 3 years of age</li> <li>unpackaged food including fruits, vegetables, legumes, and self-serve cereal bins</li> <li>food and non-alcoholic beverages in bulk presentation or packed at the point of sale (USDA 2021; White and Barquera 2020).</li> </ul>	display area is < 60 cm <sup>2</sup> where it can be displayed anywhere on the pack (Acton et al. 2023; USDA 2021; White and Barquera 2020).	Font = Arial bold.  Size of the components of the warning labels are prescribed.  Products with no warning signs or cautionary statements can state this on the label (USDA 2021).  For packages < 40 cm <sup>2</sup> , numeric warnings are required showing the number of warning labels the product should have (Acton et al. 2023; White and Barquera 2020).	white background (USDA 2021).
Israel	Nutrient-specific interpretive	Saturated fat, sodium and/or sugar (Shahrabani 2021).	Packaged foods and beverages containing saturated fat, sodium and/or sugar above certain thresholds (Shahrabani 2021)	Excluded foods: <ul style="list-style-type: none"> <li>water</li> <li>tea</li> <li>coffee</li> <li>yeast</li> <li>supplements</li> <li>infant formula</li> <li>alcohol</li> <li>special purpose foods (Jones et al. 2019).</li> </ul>	Front of package (Shahrabani 2021).	Must be proportional to the size of the food package (Endelvelt et al. 2017).	Warning label must be red with white text (Shahrabani 2021; Endelvelt et al. 2017).
Singapore	Nutrient-specific	<u>Beverages:</u> sugar and	Nutri-grade	N/A	Front of pack at point of	Only products which score a 'C' or 'D'	Text must be in black. The

Country	Type of scheme (Afroza et al. 2024)	Nutrients involved	Intended foods	Exemptions / prohibitions	Location on package	Format (legibility, presentation, size)	Colour requirements
	interpretive	<p>saturated fat (Health Promotion Board 2025).</p> <p><u>Prepackaged salt, sauces, seasonings, instant noodles and cooking oils:</u> saturated fat, sodium and/or sugars (Health Promotion Board and Ministry of Health 2025).</p>	<p>beverages,<sup>30</sup> freshly prepared beverages sold in specified settings.</p> <p>From mid-2027: foods which are contributors of sodium and saturated fat (prepackaged salt, sauces, seasonings, instant noodles and cooking oils) sold in retail settings (Health Promotion Board 2025).</p>		<p>sale (Health Promotion Board 2021).<sup>31</sup></p>	<p>(amber/red) grade are required to display the Nutri-Grade mark (Health Promotion Board 2025).</p> <p>The specific font for the mark is prescribed. There is an equation for determining the minimum size requirement of the mark as well as minimum size requirements for the wording in the mark (Health Promotion Board n.a.).</p> <p>The digital artwork by the government should be used with no modification other than to adjust the required size proportionally and add the numerical value for the percentage of the nutrient content (Health Promotion</p>	<p>specific colours of the grades in the mark are prescribed for both Pantone and CMYK colour systems (Health Promotion Board n.a).</p>

<sup>30</sup> Pre-packaged, ready-to-consume beverages, beverages that require reconstitution and beverages from automated beverage dispensers made using a pre-fixed formula.

<sup>31</sup> The face of the product package where the Nutri-Grade beverage's name and brand (if there is a brand) appear; and that is in a prospective consumer's principal field of vision.

Country	Type of scheme (Afroza et al. 2024)	Nutrients involved	Intended foods	Exemptions / prohibitions	Location on package	Format (legibility, presentation, size)	Colour requirements
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Board 2021).

The proportion relationships of the elements are also fixed and there must be clear space around the mark (Health Promotion Board 2021).

## Nutri-Score

Nutri-Score is a voluntary interpretive FoPL scheme which aims to inform consumers, in a simple and understandable way, of the overall nutritional value of foods (Afroza et al. 2024; Hercberg et al. 2021).

Nutri-Score is used voluntarily in some European countries including France, Spain, Belgium, Switzerland, Germany, Luxembourg and the Netherlands (Eurofins 2024).

This system synthesises the numerical information on the nutrition declaration and ingredients into a colour-coded grading system. It uses an algorithm which offsets unfavourable nutrients, including sugar, energy, saturated fat and salt content, against favourable nutritional values, including fibre, protein, and fruit, vegetable and pulse content. This results in a score which is associated with letters from dark green/A (associated with highest nutritional quality) to dark orange/E (associated with lower nutritional quality) (Andreeva et al. 2021; Eurofins 2024).

The UK nutrient profiling model was used as the basis for this calculation, with slight modifications to allow for a five-category algorithm which aligns the scores in each category to the French nutritional recommendations. The five categories are 'General foods', 'Red meat', 'Cheese', 'Fats/oils/nuts/seeds' or 'Drinks (including milk and plant drinks)' (Van Der Bend 2022; Eurofins 2024).

Foods which require a nutrition declaration in accordance with EU (FIC) regulation no.1169/2011 are eligible to display the Nutri-Score.<sup>32</sup> Foods not covered by the mandatory nutritional declaration<sup>33</sup> do not need to display the Nutri-Score graphic but may choose to display it as long as a nutrition declaration is also displayed (Sante Publique France 2025).

Foods which are ineligible to display the Nutri-Score graphic include:

- foods for special diets,
- sports nutrition products,
- food and dietary supplements,
- meal replacement products that are not aimed at weight control,
- alcoholic beverages > 1.2% alcohol (Sante Publique France 2025).

Dealcoholised beverages must include a mandatory nutritional declaration in a similar way to non-alcoholic beverages (e.g. soft drinks). As such, dealcoholised beverages are expected to use the Nutri-Score system if the Nutri-Score is applied to a manufacturer's non-alcoholic drink (Sante Publique France 2025).

It is recommended to place the graphic symbol on the lower third of the front of the packaging for most packages. For cylindrical or egg-shaped packages, the front is where most of the product's identity and information elements are presented (logo, brand, product name, etc) (Sante Publique France 2025).

There is a graphic chart<sup>34</sup> which describes the characteristics of the logo including its preferred placement zone, margins, proportion requirements, secondary placement zones, and colour.

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<sup>32</sup> [Regulation \(EU\) no. 1169/2011](#)

<sup>33</sup> Annex V of the [Regulation \(EU\) no. 1169/2011](#)

<sup>34</sup> [Nutri-Score graphic chart](#)

The nutritional values on the nutrition declaration are always used to calculate the Nutri-Score. Article 31 of EU (FIC) regulation 1169/2011 states the energy and nutrients in the nutrition declaration must be stated as sold. However, where appropriate, this information may relate to the food after preparation provided sufficiently detailed preparation instructions are given.<sup>35</sup> It is suggested these conditions are when the product cannot 'reasonably' be consumed as is and if a standardised recipe is available.<sup>36</sup>

If the nutrition declaration information is provided on an 'as prepared' basis and a detailed preparation method is declared, it is recommended the Nutri-Score is also provided on an 'as prepared' basis (e.g. instant soup powder). In addition, it is also recommended to indicate that the Nutri-Score refers to the product as prepared (Eurofins 2024; Sante Publique 2025).

Products which require reconstitution are permitted to have their Nutri-Score calculated as prepared, so long as there are sufficient details on the preparation method provided. This includes products prepared with milk. Products that may be used in a recipe (e.g. products that may be used with different vegetables or meats) are not permitted to calculate the Nutri-Score as prepared (Sante Publique 2025).

In the update to the algorithm in 2023, nuts and seeds were recategorised to the oils category. This was due to nuts having a relatively high fat content which was penalised under the general foods category, resulting in discrepancies in the Nutri-Score between the nuts and the oils produced from them. The algorithm of this new fats/oils/nuts/seeds category was altered as a part of this recategorisation to ensure all products in this new category received an appropriate Nutri-Score, with raw nuts scoring A or B and higher salt and sugar nut products scoring D or E (Sante Publique France 2025; Hercberg n.a).

Whilst the system is voluntary, if brands register to use the Nutri-Score, it must be displayed on all eligible products sold under that brand (Eurofins 2024). To date a decision to mandate the system has not been made (Robinson 2025).

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<sup>35</sup> [Regulation \(EU\) no. 1169/2011](#)

<sup>36</sup> Response from Professor Chantal Julia, Professor of Universities - Hospital Practitioner University Sorbonne Paris Nord Hospitals, to FSANZ enquiry.

## References

- Acton RB, Rynard VL, Adams J, Bhawra J, Cameron AJ, Contreras-Manzano A et al. (2023) 'Awareness, use and understanding of nutrition labels among adults from five countries: Findings from the 2018-2020 International Food Policy Study', *Appetite*, 180:106311, doi: <https://doi.org/10.1016/j.appet.2022.106311>.
- Afroza U, Abrar AK, Nowar A, Sobhan SMM, Ide N and Choudhury S (2024) 'Global overview of government-endorsed nutrition labelling policies of packages foods: a document review', *Frontiers in Public Health*, 12, doi: <https://doi.org/10.3389/fpubh.2024.1426639>.
- Andreeva VA, Egnell M, Touvier M, Galan P, Julia C and Hercberg S (2021) 'International evidence for the effectiveness of the front-of-package nutrition label called Nutri-Score', *Central European Journal of Public Health*, 29(1):76-79, doi: <https://doi.org/10.21101/cejph.a6239>.
- Crosbie E, Alvarez MGO, Cao M, Renteria LSV, Rodriguez E, Flota AL and Carriedo A (2023a), 'Implementing front-of-pack nutrition warning labels in Mexico: important lessons for low- and middle-income countries', *Public Health Nutrition*, 26(10):2149-2161, doi: <https://doi.org/10.1017/S1368980023001441>.
- Crosbie E, Gomes FS, Olvera J, Patiño S, Hoepfer S and Carriedo A (2023b) 'A policy study on front-of-pack nutrition labeling in the Americas: emerging developments and outcomes', *Healthy Policy*, 18:e100400, doi: <https://doi.org/10.1016/j.lana.2022.100400>.
- Endelvelt R, Grotto I, Sheffer R, Goldsmith R, Golan M, Mendelovic J and Bar-Siman-Tov M (2017) 'Regulatory measures to improve nutrition policy towards a better food environment for prevention of obesity and associated morbidity in Israel', *Public Health Panorama*, 3(4):566-74, doi: <https://iris.who.int/handle/10665/325200>.
- Eurofins (2024) [\*The Nutri-Score – all important facts and novelties at a glance\*](#), accessed April 2025.
- Freire WB, Waters WF, Rivas-Mariño G, Nguyen T and Rivas P (2016) 'A qualitative study of consumer perceptions and use of traffic light food labelling in Ecuador', *Public Health Nutrition*, 20(5):805-816, doi: <https://doi.org/10.1017/S1368980016002457>.
- Global Food Research Program (2024) [\*Front of package labels around the world\*](#), accessed May 2025.
- Government of Canada (2022) [\*Front-of-package nutrition labelling\*](#), accessed Apr 2025.
- Government of Canada (2023) [\*Front-of-package nutrition symbol labelling guide for industry\*](#), accessed Apr 2025.
- Government of Canada (2025) [\*Nutrition labelling: Front-of-package nutrition symbol\*](#), accessed May 2025.
- Health Promotion Board (2021) [\*Nutri-Grade mark for Nutri-Grade beverages usage guide for graphic applications\*](#), accessed October 2025.
- Health Promotion Board (2025). [\*Measures for Nutri-Grade\*](#), accessed May 2025.
- Health Promotion Board (n.a.) [\*Specifications of the Nutri-Grade mark and sugar declaration\*](#), accessed Apr 2026.
- Health Promotion Board and Ministry of Health (2025) [\*Specifications on Nutri-Grade extension to key contributors of sodium and saturated fat\*](#), accessed May 2025.
- Hercberg S, Galan P, Julia C, Meirhaeghe A, Deschasaux-Tanguy M, Kesse-Guyot et al (n.a) [\*The Nutri-Score nutritional label: justifications, scientific basis, user guide, benefits, limitations, deployment and update\*](#), accessed Feb 2026.

Hercberg S, Touvier M and Salas-Salvado J (2021) [The Nutri-score nutrition label](#), accessed Apr 2025.

International Trade Administration (2025) [Labeling & Marking Requirements](#), accessed Apr 2026.

Jones A, Neal B, Reeve B, Ni Mhurchu CN and Thow AM (2019) 'Front-of-pack nutrition labelling to promote healthier diets: current practice and opportunities to strengthen regulation worldwide', *BMJ Global Health*, 4(6):e001882, doi: <https://doi.org/10.1136/bmjgh-2019-001882>.

Mais LA, Borges CA, Khandpur N, Duran AC and Martins APB (2022) 'Brazil's nutrition labeling regulation Challenges ahead on the path to guaranteeing consumer's right to adequate information', *Frontiers in Nutrition*, 9:921519, doi: <https://doi.org/10.3389/fnut.2022.921519>.

Norma Technique Ecuadorian (2021) [Labelling of food products for human consumption. Part 2](#), accessed Apr 2026.

Official Gazette of the Union (2020) [Normative instruction-in no.75, of October 8, 2020](#), accessed May 2025.

Reyes M, Garmendia ML, Olivares S, Aqueveque C, Zacarias I and Corvalan C (2019) 'Development of the Chilean Front-of-package food warning label', *BMC Public Health*, 19:906, doi: <https://doi.org/10.1186/s12889-019-7118-1>.

Robinson N (2025) [Nutri-Score abandoned by European Commission](#), accessed April 2025.

Sante Publique France (2025). [Nutri-Score Questions & Answers English Version](#), accessed June 2025.

Shahrabani S (2021) 'The impact of Israel's Front-of-package labeling reform on consumers' behavior and intentions to change dietary habits', *Israel Journal of Health Policy Research*, 10:44, doi: <https://doi.org/10.1186/s13584-021-00482-w>.

USDA (United States Department of Agriculture) (2020). [Mexico Front of Pack Warning Labels Implementation Update](#), USDA, accessed May 2025.

USDA (United States Department of Agriculture) (2021) Mexico: [Front of pack labelling manual published](#), USDA, accessed Apr 2026.

USDA (United States Department of Agriculture) and Global Agricultural Information Network (GAIN) (2021a) [Food and Agricultural import regulations and standards country report – Ecuador](#), USDA and GAIN, accessed September 2025.

USDA (United States Department of Agriculture) and Global Agricultural Information Network (GAIN) (2021b) [Food and Agriculture import Regulations and Standard Country Report – Chile](#), USDA and GAIN, accessed May 2025.

USDA (United States Department of Agriculture) and Global Agricultural Information Network (GAIN) (2023) [Sri Lanka enacts new legislation to color code sugar levels for liquid food](#), USDA and GAIN, accessed September 2025.

Van der Bend DLM, Van Eijnsden M, Van Roost MH, de Graaf K and Roodenburg AJC (2022) 'The Nutri-Score algorithm: Evaluation of its validation process', *Frontiers in Nutrition*, 15(9):974003, doi: <https://doi.org/10.3389/fnut.2022.974003>.

White Mand Barquera S (2020) 'Mexico adopts food warning labels, why now?', *Health systems & reform*, 6(1):e1752063, doi: <https://doi.org/10.1080/23288604.2020.1752063>.

## **Attachment C – Proposed approach for calculating a Health Star Rating**

### **C1 Process for calculating a HSR**

There are several steps that must be completed to calculate a foods HSR:

1. Determining whether the food is eligible for an automatic HSR
2. Determining the form of the food for the HSR
3. Determining the HSR category for the food
4. Calculating baseline points
5. Calculating modifying points
6. Calculating the final HSR score
7. Converting the final HSR score into a star rating

#### **Step 1. Determining whether the product is eligible for an automatic HSR**

The following foods would be eligible for an automatic HSR without the use of the calculator (subject to food additive permissions):

- plain packaged water and carbonated water (5 stars). No additives permitted except carbon dioxide for sparkling water.
- unsweetened water-based flavoured beverages (4.5 stars). Could contain additives permitted to be used in water based flavoured drinks except for quinine, intense sweeteners, colours and food additives containing sodium. Could not contain any other ingredients or those additives specifically permitted in electrolyte drink and electrolyte drink bases, cola type drinks (caffeine), and brewed soft drinks.
- fresh and minimally processed fruit, vegetables, fungi and legumes (5 stars). Could contain food additives permitted to be used in fruits and vegetables, taking into account the type of processing.

#### **Step 2. Determining the form of the food for the HSR**

In most cases the HSR would be calculated based on the form of the food as it appears on the shelf.

A foods HSR would be calculated on a reconstituted basis if it is intended to be reconstituted with water before consumption.

The HSR would be calculated on a drained basis for foods intended to be drained before consumption.

#### **Step 3: Determining the HSR category for the food**

Each food needs to be categorised as one of the six categories shown in Table C1.

**Table C1: Summary of HSR Categories**

<b>HSR category</b>	<b>Category summary</b>
1	<b>All beverages not captured in 1D, jellies and ice confectionery</b>
1D	<p><b>Milk, milk-based beverages and dairy beverage analogues derived from legumes, cereals, nuts, and/or seeds, including dried milk/milk analogues</b></p> <p>Calcium content would need to be <math>\geq 100</math> mg/100 mL</p> <p>Would also be required to be <math>\geq 75\%</math> dairy or dairy analogue</p>
2	<b>Foods that do not fit in any other category</b>
2D	<p><b>Non-frozen dairy foods, and dairy analogue foods derived from legumes, not included in category 1D or 3D</b></p> <p>Yoghurt analogues and dairy dessert analogues derived from legumes would need to contain no less than 3.1% m/m protein derived from legumes</p> <p>Cheese analogues derived from legumes would need to contain no less than 15% m/m protein derived from legumes (and contain <math>\leq 320</math> mg/100 g calcium to not be in Category 3D).</p> <p>Would also be required to be <math>\geq 75\%</math> dairy or dairy analogue</p>
3	Fats and edible oils
3D	<p><b>Cheese and processed cheese, and cheese analogues derived from legumes</b></p> <p>Calcium content would need to be <math>&gt; 320</math> mg/100 g</p> <p>Would also be required to be <math>\geq 75\%</math> dairy or dairy analogue</p>

**Step 4: Calculating HSR baseline points**

HSR baseline points are calculated for the average quantity of the following risk-associated components per 100 g or 100 mL of the food:

**Energy (Categories 1, 1D, 2, 2D, 3 and 3D)**

- up to a maximum of 11 points for more than 3,685 kJ per 100 g/mL of a food for categories 1D, 2, 2D, 3 and 3D
- up to a maximum of 10 points for more than 271 kJ per 100 mL for Category 1.

**Saturated fat (Categories 1D, 2, 2D, 3 and 3D)**

- up to a maximum of 30 points for more than 90% saturated fat in a food for categories 1D, 2 and 2D

- up to a maximum of 30 points for more than 30% saturated fat in a food for categories 3 and 3D.

#### **Total sugars (Categories 1, 1D, 2, 2D, 3 and 3D)**

- up to a maximum of 25 points for more than 99% total sugars in a food for Category 1D, 2 and 2D
- up to a maximum of 10 points for more than 13.6% total sugars in a food for Category 1
- up to a maximum of 10 points for more than 45% total sugars in a food for Category 3 and 3D.

#### **Sodium (Categories 1D, 2, 2D, 3 and 3D)**

- up to a maximum of 30 points for more than 2.7% sodium in a food for all categories excluding Category 1.

Baseline points are calculated based on the points tables which can be found in Section C2.1.

#### **Step 5: Calculating HSR modifying points**

HSR modifying points may be scored for the positive components in a product:

##### **FVNL (V points) (Categories 1, 1D, 2, 2D, 3 and 3D)**

- V points can be scored for FVNL in a food from 1 point (for >40% FVNL) to a maximum of 8 points (for 100% FVNL) for categories 2 and 3.
- V points can be scored for FVNL in a food from 1 point (for ≥25% FVNL) to a maximum of 10 points (for ≥96% FVNL) for Category 1.

##### **Protein (P points) (Categories 1D, 2, 2D, 3 and 3D)**

- P points can be scored for protein if a food scores less than 13 baseline points, or scores ≥13 baseline points and 5 or more V points – from 1 up to a maximum of 15 points for more than 50% protein for Categories 1D, 2, 2D, 3, 3D

##### **Fibre (F points) (Categories 2, 2D, 3 and 3D)**

- F points can be scored for dietary fibre for foods in Category 2, 2D, 3 and 3D – from 1 up to a maximum of 15 points for more than 20% dietary fibre

Modifying points are calculated based on the points tables which can be found in Section C2.2.

#### **Step 6: Calculating the final HSR score**

The final HSR Score is calculated by subtracting the modifying points (V, P and/or F points) if eligible from the HSR baseline points, using the below formula:

$$\text{Final HSR Score} = \text{baseline points} - (\text{V points}) - (\text{P points}) - (\text{F points})$$

## Step 7: Converting the HSR score to a star rating

Final HSR score is converted to a star rating for all foods using Table C8, except for a multicomponent food containing cheese (as defined in Standard 1.1.2 and which meets the condition for calcium content specified in Category 3D) and crackers, an additional calculation is required as follows:

$$\text{HSR of cheese and crackers} = \frac{(\text{cheese HSR in Category 3D} \times \text{cheese proportion}) + (\text{cracker HSR in Category 2} \times \text{cracker proportion})}{2}$$

The result of the calculation is rounded to the nearest 0.5.

## C2 Points tables used in algorithm for calculating a HSR

### C2.1 Baseline points tables

**Table C2: HSR baseline points for Categories 1D, 2 and 2D**

Baseline points	Energy (kJ) per 100 g or 100 mL	Saturated fat (g) per 100 g or 100 mL	Total sugars (g) per 100 g or 100 mL	Sodium (mg) per 100 g or 100 mL
0	≤335	≤1.0	≤5.0	≤90
1	>335	>1.0	>5.0	>90
2	>670	>2.0	>8.9	>180
3	>1005	>3.0	>12.8	>270
4	>1340	>4.0	>16.8	>360
5	>1675	>5.0	>20.7	>450
6	>2010	>6.0	>24.6	>540
7	>2345	>7.0	>28.5	>630
8	>2680	>8.0	>32.4	>720
9	>3015	>9.0	>36.3	>810
10	>3350	>10.0	>40.3	>900
11	>3685	>11.2	>44.2	>990
12		>12.5	>48.1	>1080
13		>13.9	>52.0	>1170
14		>15.5	>55.9	>1260
15		>17.3	>59.8	>1350
16		>19.3	>63.8	>1440
17		>21.6	>67.7	>1530
18		>24.1	>71.6	>1620
19		>26.9	>75.5	>1710
20		>30.0	>79.4	>1800

<b>Baseline points</b>	<b>Energy (kJ) per 100 g or 100 mL</b>	<b>Saturated fat (g) per 100 g or 100 mL</b>	<b>Total sugars (g) per 100 g or 100 mL</b>	<b>Sodium (mg) per 100 g or 100 mL</b>
21		>33.5	>83.3	>1890
22		>37.4	>87.3	>1980
23		>41.7	>91.2	>2070
24		>46.6	>95.1	>2160
25		>52.0	>99.0	>2250
26		>58.0		>2340
27		>64.7		>2430
28		>72.3		>2520
29		>80.6		>2610
30		>90		>2700

**Table C3: HSR baseline points for Categories 3 and 3D**

<b>Baseline points</b>	<b>Energy (kJ) per 100 g or 100 mL</b>	<b>Saturated fat (g) per 100 g or 100 mL</b>	<b>Total sugars (g) per 100 g or 100 mL</b>	<b>Sodium (mg) per 100 g or 100 mL</b>
0	≤ 335	≤1.0	≤ 5.0	≤ 90
1	>335	>1.0	>5.0	>90
2	>670	>2.0	>9.0	>180
3	>1005	>3.0	>13.5	>270
4	>1340	>4.0	>18.0	>360
5	>1675	>5.0	>22.5	>450
6	>2010	>6.0	>27.0	>540
7	>2345	>7.0	>31.0	>630
8	>2680	>8.0	>36.0	>720
9	>3015	>9.0	>40.0	>810
10	>3350	>10.0	>45.0	>900
11	>3685	>11.0		>990
12		>12.0		>1080
13		>13.0		>1170
14		>14.0		>1260
15		>15.0		>1350
16		>16.0		>1440
17		>17.0		>1530
18		>18.0		>1620
19		>19.0		>1710
20		>20.0		>1800
21		>21.0		>1890
22		>22.0		>1980
23		>23.0		>2070
24		>24.0		>2160
25		>25.0		>2250
26		>26.0		>2340
27		>27.0		>2430
28		>28.0		>2520
29		>29.0		>2610
30		>30.0		>2700

**Table C4: HSR baseline points for Category 1**

<b>Baseline points</b>	<b>Energy (kJ) per 100mL</b>	<b>Total sugars (g) per 100mL</b>
0	-	≤ 0.1
1	≤31	>0.1
2	>31	>1.6
3	>61	>3.1
4	>91	>4.6
5	>121	>6.1
6	>151	>7.6
7	>181	>9.1
8	>211	>10.6
9	>241	>12.1
10	>271	>13.6

## C2.2 Modifying points tables

**Table C5: HSR V points for Categories 1D, 2, 2D, 3 and 3D**

Points	% FVNL
0	≤40
1	>40
2	>60
3	>67
4	>75
5	>80
6	>90
7	>95
8	=100

**Table C6: HSR V Points for Category 1**

Points	% FVNL
0	< 25
1	≥ 25
2	≥ 33
3	≥ 41
4	≥ 49
5	≥ 57
6	≥ 65
7	≥ 73
8	≥ 81
9	≥ 89
10	≥ 96

**Table C7: HSR Protein (P) and Fibre (F) Points**

<b>Points</b>	<b>Protein (g) per 100 g or 100 mL</b>	<b>Dietary fibre (g) per 100 g or 100 mL</b>
0	≤1.6	≤0.9
1	>1.6	>0.9
2	≥3.2	>1.9
3	>4.8	>2.8
4	>6.4	>3.7
5	>8.0	>4.7
6	>9.6	>5.4
7	>11.6	>6.3
8	>13.9	>7.3
9	>16.7	>8.4
10	>20.0	>9.7
11	>24.0	>11.2
12	>28.9	>13.0
13	>34.7	>15.0
14	>41.6	>17.3
15	>50.0	>20.0

### C2.3 Table for converting HSR scores into HSR

Table C8: HSR scores by category, with final Heath Star Rating

HSR rating	HSR Score					
	Cat. 1	Cat. 1D	Cat. 2	Cat. 2D	Cat. 3	Cat. 3D
5	Water	≤-2	Eligible fruits and vegetables ≤-11	≤-2	≤13	≤24
4.5	Unsweetened Flavoured water	-1	-10 – -7	-1 – 0	14 – 16	25 – 26
4	≤0	0	-6 – -2	1 – 2	17 – 20	27 – 28
3.5	1	1	-1 – 2	3	21 – 23	29 – 30
3	2 – 3	2	3 – 6	4 – 5	24 – 27	31
2.5	4 – 5	3	7 – 11	6 – 7	28 – 30	32 – 33
2	6 – 7	4	12 – 15	8	31 – 34	34 – 35
1.5	8 – 9	5	16 – 20	9 – 10	35 – 37	36 – 37
1	10 – 11	6	21 – 24	11 – 12	38 – 41	38 – 39
0.5	≥12	≥7	≥25	≥13	≥42	≥40