

TE WAIORA



Nelson Marlborough  
**Health**

# **Submission on the Five Year Review of the Health Star Rating System – Consultation Paper**

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## Introduction

1. Nelson Marlborough Health (Nelson Marlborough District Health Board) (NMH) is a key organisation involved in the health and wellbeing of the people within Te Tau Ihu. NMH appreciates the opportunity to comment from a public health perspective on the Food Regulation Standing Committee (FRSC)'s Five Year Review of the Health Star Rating System – Consultation Paper.
2. NMH makes this submission in recognition of its responsibilities to improve, promote and protect the health of people and communities under the New Zealand Public Health and Disability Act 2000 and the Health Act 1956.
3. This submission sets out particular matters of interest and concern to the Public Health Service, NMH, particularly in relation to overall dietary requirements and equity.

## General Comments

4. NMH welcomes this consultation into the review of the Health Star Rating (HSR) System. The HSR System enables people to quickly ascertain the overall health rating of packaged and processed food enabling people to make informed decisions. The benefits of the HSR System is that it is holistic and reviews the levels of fat, sodium, fibre and sugar in products. In order for people to be and remain healthy, they need to have a balanced nutritious diet; however New Zealand has high levels of obesity (32% of adults are obese, 34% of adults are overweight, and the child obesity rate is 12%).<sup>1</sup> Overweight and obesity are major risk factors for a number of chronic diseases including diabetes, cardiovascular diseases and cancer.
5. The advantage of the HSR System is that it is quick, easily understood, clear and consistent without the need for extensive education. The format can be quickly understood by the broader population including those with numerical or literacy difficulty, and those who are unable to read small font sizes. The HSR System has faced criticisms regarding the weighting of products. NMH is pleased to see that the review covers the calculations given to sugar, fat, sodium and fibre. The revisions given to the HSR System will result in a more robust system that will improve trust and could result in more people using the system to inform their purchasing decisions. It is noted that in New Zealand, that 40% of those surveyed had trust in the HSR System, it is hoped that this review will increase the perceived integrity of the System. In addition the ratings given under the HSR can incentivise manufacturers to reformulate their products to reduce sugar, sodium and fat which will have positive health benefits.

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<sup>1</sup> <https://www.health.govt.nz/nz-health-statistics/health-statistics-and-data-sets/obesity-statistics>

## Specific Comments

6. NMH recommends that the HSR System is made mandatory for food manufacturers. This would enable customers to easily ascertain which food products are the healthiest.
7. This consultation has provided a number of options for consideration. NMH recommends that the Food Regulation Standing Committee (FRSC) adopt a range of options that enable consumers to be easily informed about food choices. The following paragraphs outlined NMH's preferred options in the consultation document:
8. *Fresh or minimally processed fruits and vegetables – Option B:* NMH supports Option B that all fresh and minimally processed fruits and vegetables automatically receive an HSR of 5, as this clearly articulates to consumers that fruit and vegetables are healthy and removes any confusion that there are significant differences in the nutritional content of vegetables or fruit that have been minimally processed and whole fruit and vegetables. This simplified system helps to emphasise the importance that the consumption of fruit and vegetables in people's diets.
9. *Non-dairy beverages – Option E.* NMH agrees that the HSR System should encourage consumers to drink water. NMH supports positioning water, with no additions, as the healthiest option, then the next healthiest option is still and carbonated flavoured water (with no added sugar) products that are close in nutritional profile to water. NMH acknowledges there is nutritional value in vegetable juices, however the acidic nature of fruit juices as well as the high sugar content mean that fruit juices should not be treated the same as vegetable juices and should receive a lower star rating.
10. *Sugars – Option C.* NMH supports Option C to increase the baseline points awarded for total sugars to reduce the HSRs for products relatively high in total sugars. This option would result in products with a high number of total sugars gaining a lower HSR. These include products such as muesli bars, flavoured milks and yoghurts, and dried fruits which are frequently given to children. More accurate identification of sugars within the Health Star Rating will make it easier to make informed choices about food especially in terms of food provided to children in their school lunchboxes. More clarity around total sugars in the products listed above will bring more consistency to the HSR System and will maintain its integrity with consumers.
11. *Sodium – Option B:* NMH supports Option B that would decrease the maximum sodium levels used to determine baseline points for sodium to better reflect the range of sodium levels in the food supply. This option brings more clarification to those people at high risk of developing health problems related to salt consumption such as those people over age 50, those with elevated blood pressure and those with diabetes or heart conditions.
12. *Positive nutrients (protein and fibre) – Option B:* NMH supports adjusting the threshold at which products can claim modifying protein points to reduce the ability for less healthy

products to increase their HSR through protein. This would bring more clarity for consumers regarding the content of breakfast cereals, muesli bars, salty snacks and processed meats.

It is also important that protein is retained within in the HSR so it can be used as a surrogate for iron and calcium content.

13. *Fibre – Option B*: NMH supports Option B that enables foods to receive more points where more wholegrains are present in the food. This option would provide people with more information about the level of wholegrains in food which may increase healthier food choices however NMH acknowledges that this option does require manufacturers to do additional work to identify the wholegrain content which may become a barrier for manufacturers.
14. *Oils and oil based spreads – Option B*: NMH supports Option B that rescales Category 3 upwards to increase and narrow the range of HSRs so that healthy oils receive higher HSRs. This would better represent their relative nutritional value. These changes would provide more consistent messaging to consumers.
15. *Salty snacks – Option B*: NMH agrees that salty snacks do not require a separate category because the HSR System already discriminates well between more-healthy and less healthy salty snacks.
16. *Dairy Desserts – Option B*: NMH supports Option B that redefines Category 2d to include dairy desserts and rescale to ensure that healthier options receive high HSRs and comparability is improved between similar dairy products. These proposed changes would ensure that less healthy options score lower HSRs than healthier alternatives which provides consumers with clarity.
17. *Ice confections and jellies – Option B*: NMH supports Option B that redefines Category 1 to include jellies and water based ice confections to align their HSR with nutritionally similar non-dairy beverages. This clarifies as this food as a discretionary food.
18. *Additional information*: NMH advocates for the rigorous intervention studies to monitor the effectiveness of HSR System on consumer behaviour and food purchases to ensure that these measures are resulting in change and to ensure that the labelling is meeting the needs of Maori, Pacific Island, low-income and other vulnerable groups at greater risk of health inequalities. Additional research should be undertaken to find out the effectiveness of different forms of labelling, to find out whether changes have had the desired benefit among the target groups, and compliance work to monitor that manufacturers are adhering to the rules.

## Conclusion

19. In order to tackle health inequalities, HSR System must meet the requirements of groups who suffer disproportionately from nutrition-related disease. Nutrition information must be simple, easy to see and understand, and consumers must trust the integrity of the system.
20. NMH advocates for a holistic approach to be taken to food labelling and is strongly supportive of greater consistency across the HSR System as this will build further trust in the robustness of the system. NMH recommends that the HSR is made compulsory for food manufacturers. NMH thanks the Food Regulation Standing Committee for the opportunity to comment.

Yours sincerely



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