

14 July 2019

Hon Damien O'Connor  
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Dear Minister

**HEALTH STAR RATING SYSTEM:  
Five-year review**

We are writing in relation to the finalisation of the Health Star Rating (HSR) system review, which will be discussed at the Ministerial Forum on Food Regulation on 17 July, 2020.

Consumer NZ supports front-of-pack nutrition labelling and acknowledges the five-year review made some positive recommendations for improving the HSR system. However, we're disappointed the system will continue to be voluntary. To enable consumers to compare products and make better food choices, labelling must be mandatory.

By maintaining a voluntary system, New Zealand risks falling behind other countries in taking action to improve health outcomes. Ten countries now have mandatory front-of-pack labelling systems. In May 2020, a report published by the European Commission concluded it was appropriate to introduce mandatory front-of-pack nutrition labelling at the EU-level.

Public health experts also support a mandatory system. The panel of the 2020 Food Environment Policy Index, which is made up of more than 50 public health professionals, was unanimous that HSR uptake and food reformulation rates were too low to warrant relying on voluntary implementation.

*The Health Star Rating System in New Zealand 2014-2018* report, published by the Ministry for Primary Industries, found only 20.9 percent of eligible products in the Nutrtrack database carried a HSR.

Consumer NZ also remains disappointed the problem of added sugars, and how they're treated in HSR calculations, wasn't adequately addressed in the five-year review. The review was a missed opportunity to improve the algorithm and better align with dietary guidelines.

We urge the Ministerial Forum to take action on these issues. If you require any further information, please do not hesitate to contact me.

Yours sincerely



Jon Duffy  
Consumer NZ chief executive