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Submitted to P1067 - Health Star Rating System
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How to make your submission

The survey response form includes four sections.

Publishing your submission and consent to collect personal information

I consent to the collection of personal information in this online survey form.:
Yes

About you

Full name

Full name:
Elisha West

Email address

Email address:
elisha.west@ozharvest.org

Contact person

Full name:
Elisha West

Email address:
elisha.west@ozharvest.org

Submitter name

Organisation - please write your organisation name in the box below.

Enter initials if you are an individual, or enter your organisation name:
OzHarvest

Which group do you most identify with?

Other

If other, please specify::
Not for Profit

If you wish to provide general background information about yourself or your organisation (if any), include this in the box below.

General background information about you or your organisation:

OzHarvest is Australia's leading food rescue organisation. Founded in Sydney in 2004, our purpose is to Nourish Our Country. Our work spans three pillars:

1. Feeding people in need and stopping good food from going to waste underpins our food rescue operations and food relief services. Food insecurity continues at an all-time high, and our goal is to ensure everyone can access a fresh, nutritious meal.
2. Education is crucial to OzHarvest to help enable positive change. Our education goal is to strengthen community connections, improve life skills, and increase healthy eating and food waste awareness with a range of programs to inspire school children, youth experiencing disadvantage, and adults and families in need.
3. Our advocacy work aims to drive action towards achieving the national target of halving food waste by 2030 and to improve food security for all Australians. We work with all levels of government and the food rescue sector to influence policy, raise the issues, and share our knowledge and expertise. For example, OzHarvest is currently looking at opportunities to reduce household food waste through improvements to date labelling.

NEST (Nutrition Education Skills Training) is OzHarvest's national adult food literacy and nutrition program. Delivered as a six-week course with weekly 2.5-hour sessions, NEST combines interactive learning, practical cooking classes, and a shared meal each week.

The program is aligned with the Australian Dietary Guidelines and designed especially for adult groups most at risk of food insecurity due to lack of food literacy and cooking skills (West et al. 2020, Kearsey et al. 2024). NEST runs in Adelaide, Brisbane, Sunshine Coast, Canberra, Newcastle, Melbourne, and Sydney, and is currently being launched into regional locations across Australia. NEST reaches approximately 2,500 participants each year across 200+ programs delivered annually. Since the program launched in 2012, NEST has been delivered to 14,400 people.

Each week covers a different theme: Week 1 introduces healthy eating foundations and the five food groups; Week 2 focuses on building balanced meals and the importance of key nutrients including fibre, iron, and calcium; Week 3 includes a dedicated food label reading session where participants learn to interpret the Health Star Rating, the Nutrition Information Panel, ingredient lists, and critique product marketing to compare products and make informed choices; Week 4 covers food safety and reducing household food waste; in Week 5 there is a choice of different topics including navigating the supermarket, takeaway choices, nutrition for pregnancy and lactation, nutrition for infants and young children, and the role of physical activity for health and wellbeing; and Week 6 brings it all together with food budgeting tips, goal-setting, and graduation (West et al. 2020).

Participants cook and share a meal at every session, applying new knowledge in a practical, hands-on setting. At graduation, participants receive a certificate and a take-home toolkit including the OzHarvest Everyday Cookbook. NEST participants are from vulnerable cohorts, particularly adults experiencing food insecurity and financial hardship, people from culturally and linguistically diverse (CALD) backgrounds, and adults with lower health and nutrition literacy. These are the communities who have the most to gain from a clear, consistent, and mandatory front-of-pack labelling system.

Your submission

Have you read Proposal P1067 Health Star Rating System - First Call for Submissions (CFS) and Supporting Documents (SDs)?

Yes

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 the CFS)? Why/why not?

I support/I do not support the assessment that mandating the HSR system would better support healthier food choices than a voluntary system. Why/why not?:

OzHarvest strongly supports FSANZ's assessment that mandating the Health Star Rating system would better support healthier food choices than the current voluntary approach.

The case for mandating is undeniable. After more than a decade of voluntary implementation, the HSR appears on only around 37% of eligible products (DOHAC, 2025). Industry has failed to reach the 70% target by November 2025, with uptake slightly declining in recent years. The voluntary system has allowed food manufacturers to display the HSR selectively on higher-scoring products while withholding it from lower-scoring ones, distorting its value as a comparative tool for consumers (George Institute, 2023).

OzHarvest has extensive experience delivering nutrition education to vulnerable cohorts. It is our assessment that this selective uptake disproportionately causes harm to these cohorts, particularly adults from low-income households, people from CALD communities, people living with a disability, and adults with lower health and nutrition literacy. These population groups face additional barriers to reading and interpreting food labels including low literacy levels, poor eyesight, navigating new food environments, and access to food supply. Consequently, they are more reliant on simple, consistent, at-a-glance information to navigate the supermarket environment. When the HSR is only on some products, comparison shopping becomes particularly challenging for people who already face significant barriers to making healthy food choices.

We teach how to use the Health Star Rating explicitly in NEST's Week 3 'Eat for Balance' session, as part of a dedicated module on food label reading (West et al. 2020). Our participants report that understanding food labels is tricky and prior to NEST's food label education, they frequently rely on front of packaging information to make food choices. Our participants also share confusion around why some products have the health star rating, and others do not; some think that if the health star rating is displayed, it must be a healthier option. This lived experience from the NEST program reinforces that the HSR is a useful, accessible tool when participants can apply it consistently, but its value is undermined when it only appears on some products on the shelf.

The Public Health Association of Australia (PHAA) notes that over 80% of Australian consumers support displaying the HSR on all products, and that there is strong community support for stricter food labelling standards (Ilchenko et al. 2024; PHAA, 2023a; Yin et al., 2023; Pettigrew et al., 2023). We hear similar commentary in the NEST program with participants sharing that they wish there was a simpler way to compare food items and identify which foods are healthiest.

We also note that a mandatory Country of Origin Label was adopted on 93% of products within three years of it becoming mandatory in 2018. This demonstrates that widespread labelling change is entirely feasible when required by law and directly refutes industry's claims about cost as the primary barrier to adoption (Jones et al. 2024).

Mandating the HSR is the single most important action available to maximise the HSR system's public health impact. We support FSANZ's proposal for mandatory regulation.

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 the CFS and section 2 of SD5)? Please provide reasons and describe any practical or implementation issues FSANZ should consider.

I support/I do not support proposed approach for the application of the HSR? Why/why not?:

OzHarvest supports FSANZ's proposed approach for applying the HSR. We support the principle that wherever a Nutrition Information Panel (NIP) is required, a Health Star Rating should also be displayed to help consumers interpret that information.

The NIP alone is not sufficient for people with lower English literacy levels, and lower food and nutrition literacy, which describes a significant proportion of marginalised populations. The HSR translates numerical nutrient data into a simple summary that people can use quickly and confidently when shopping.

We also support the approach of allowing HSR to be voluntarily displayed (where not prohibited) on packaged foods that are not usually required to display a NIP (including brewed soft drinks), and on food in hampers and unpackaged foods where these foods display a NIP. This supports the general principle that where nutrition information is provided, it is interpreted for consumers.

We also support voluntary display of HSR on fresh and minimally processed fruit and vegetables that receive an automatic HSR. We think that this will be a beneficial way to promote consumption of fresh and minimally processed fruit and vegetables; particularly for options such as canned and frozen, which are generally more affordable and/or shelf stable.

Additionally, we strongly support FSANZ's approach to prohibit HSR on alcohol and no/low alcohol products to ensure that HSR does not convey that there are 'healthier' versions of these drinks.

Front-of-pack labelling systems can support consumer decision-making and encourage positive reformulation of products; however, they should form part of a broad suite of policies to make food environments healthier to further support the Australian population to make healthier food choices.

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 cm²) (see section 2.2.6.3.6 of SD5)? Please provide examples and outline any practical solutions or approaches to address these challenges.

Space limitations and legibility - examples and/or solutions:

Outside OzHarvest/NEST's scope.

4. Do you support FSANZ's proposed overall approach with respect to calculating the HSR (see section 4.3.1 and Attachment C of the CFS)? Please provide reasons for your response, including any specific aspects of the proposed approach that you consider problematic or could be improved.

I support/I do not support overall proposed calculation approach. Why/why not?:

OzHarvest supports FSANZ's proposed overall approach to the HSR algorithm, and in particular supports the decision not to undertake a comprehensive algorithm review prior to mandating. For the communities OzHarvest serves, the priority is access to a consistent, trustworthy label on every eligible product. Delaying mandatory implementation to resolve algorithm complexities would further postpone access for the adults most reliant on clear front-of-pack information to make healthier food choices.

We note FSANZ's finding that the current algorithm aligns with the Australian Dietary Guidelines in approximately 79% of cases, and that alignment is lower (73%) for discretionary foods. While we recognise the algorithm is broadly functioning as intended, material misalignment remains a concern.

Vulnerable people find it challenging to navigate a supermarket with limited time, budget, and prior nutrition knowledge. In NEST's Week 3 "Eat for Balance" session, facilitators teach participants to use the HSR as a quick comparison guide. The effectiveness of that teaching depends on participants being able to trust that higher-rated products are genuinely healthier choices. Even a small proportion of outlier products can erode that trust. Where the algorithm produces results that contradict community expectation, it undermines the food literacy we are working to build.

We therefore strongly support the commitment by Food Ministers to a future, comprehensive algorithm review. We ask that this review be conducted following the release of the updated Australian Dietary Guidelines, and that it prioritises the following areas most relevant to the food choices and health outcomes of people on low incomes and those with lower nutrition literacy:

1. Strengthening penalties for nutrients of concern: Sodium and sugars thresholds should be tightened to reflect current evidence of health risk. People experiencing food insecurity are disproportionately exposed to packaged, processed foods that are high in sodium and added sugars. An algorithm that more accurately penalises these nutrients will better serve the communities OzHarvest works with. The treatment of sugars should also be strengthened, with consideration given to added sugars and higher penalties for total sugars, in line with current nutrition evidence (Peters et al., 2017; Jones et al., 2019).

2. Rebalancing positive and negative components: The current algorithm allows positive attributes (protein, fibre, and fruit, vegetable, nut, and legume (FVNL) content) to substantially offset negative components such as energy, saturated fat, sodium, and sugars. This can produce ratings for processed products that do not reflect their overall nutritional quality. A rebalancing of weighting and eligibility criteria for positive components, in line with approaches used internationally (e.g. Nutri-Score, Ofcom), would improve the accuracy and trustworthiness of the system (Dickie et al., 2022).

3. Treatment of non-sugar sweeteners (NSS): NSS are currently perceived by consumers as a healthier alternative to sugar; however, in alignment with WHO guidelines, NSS should not be used as a means of reducing the risk of non-communicable diseases (NCDs). We therefore recommend incorporating penalties for non-sugar sweeteners to prevent products containing NSS from receiving high ratings, as has been done in Nutri-Score.

4. Consider ultra-processing: The role of ultra-processing should also be examined, with a view to incorporating this factor in an evidence-based manner (Barrett et al. 2025).

5. Improving discrimination across the star scale: The way raw algorithm scores are converted into star ratings should be reviewed to ensure the final ratings spread products out more clearly from less healthy to more healthy. Currently, too many products cluster at similar star ratings despite meaningful differences in nutritional quality. For NEST participants who are learning to use the HSR as a comparison tool, having a label that distinguishes clearly between products is essential. If two products on the same shelf show the same star rating, but one is significantly less healthy than the other, the label fails the people who need it most.

We support Food Ministers committing to a clear public timeframe for this review. Transparency about the process, and its separation from commercial interests, will be important for maintaining community trust in the HSR system as a public health tool rather than an industry one.

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 the CFS and section 3.1 of SD5)? Please provide reasons for your response.

I support/I do not support proposed approach on categorisation of foods for the algorithm. Why/why not?:

Outside OzHarvest/NEST's scope.

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.

Please outline your views on the approaches considered for accounting for milk powder in foods in the dairy categories. Please describe any alternative approaches that may better address the issues identified:

Outside OzHarvest/NEST's scope.

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 the CFS 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.

I support/do not support the proposed approach for the basis of the HSR calculation (form of the food):

Outside OzHarvest/NEST's scope.

8. Do you support FSANZ's proposed approach with respect to fruit, vegetable, nut, legume (FVNL) content used when calculating the HSR (see section 4.3.4 of the CFS 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.

I support/I do not support the proposed approach for including FVNL content when calculating a HSR.:

OzHarvest supports FSANZ's proposed approach to combining non-concentrated FVNL and concentrated FV into a single category, and to removing eligibility points for dried potato crisps and similar vegetable or legume snack products.

Across the first three weeks of NEST, participants learn about the five food groups, discretionary foods, and how to navigate choosing healthier snack options. A recurring challenge is that some packaged snack foods (muesli bars, vegetable crisps, and similar products) can carry star ratings that do not match participants' expectations of what a discretionary food should score. This can create confusion and undermines confidence in the HSR as a reliable guide.

The proposed changes address this directly. Reducing the star ratings of muesli bars and snack foods that have benefited from concentrated FVNL points and removing FVNL credit for dried potato crisps, and similar products, would bring the HSR into better alignment with what the Australian Dietary Guidelines classify as discretionary foods. This is consistent with ADG guidance that such foods should be consumed only occasionally and in small amounts (NHMRC, 2013). It would also make the HSR a more honest teaching tool, one that reinforces, rather than contradicts, the food literacy messages NEST delivers.

We note this change aligns with approaches taken by comparable international algorithms, including Nutri-Score and the Ofcom model, which do not award positive points for concentrated FVNL (Jones et al., 2019).

9. Do you support FSANZ's proposed approach with respect to algorithm overrides (see section 4.3.5 of the CFS)? Please provide reasons for your response, including any specific aspects of the proposed approach that you consider problematic or could be improved.

I support/I do not support the proposed approach for algorithm overrides. Why/why not?:

Outside OzHarvest/NEST's scope.

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 the CFS and section 3.2 of SD5)? Please provide reasons for your response.

I support/I do not support the proposed approach regarding layers of packaging, multipacks, individual portion packs and multicomponent foods. Why/why not?:

Outside OzHarvest/NEST's scope.

11. Do you support FSANZ's proposed approach for the HSR symbol to be the stars element only (see section 4.4.1 of the CFS and section 1.1 of SD4)? Please provide reasons for your response, including any evidence on consumer use or implementation considerations.

I support/I do not support the proposed approach for the HSR symbol to be the stars element only. Why/Why not (include evidence on consumer use or implementation considerations)?:

OzHarvest strongly supports FSANZ's proposed approach to standardise the HSR symbol as the star element only.

This is directly relevant to the communities NEST serves. FSANZ's consumer literature review (SD1) found that the additional information panels in multi-element formats confused consumers and did not assist them in making healthier choices. For adults with lower health and food literacy, a simple, consistent star graphic is far more effective than a multi-component display that requires additional decoding.

FSANZ research has shown that 71% of products already display only the stars element, and that a star-only format reduces the burden on enforcement agencies and industry alike.

The PHAA has found that simplifying the HSR visual depiction to display only the summary rating improves consumer understanding (PHAA, 2023a; Pettigrew et al., 2023). We agree that this would improve our NEST participants' understanding of the HSR. In NEST's Week 3 'Eat for Balance' session, facilitators teach participants to use the stars as a quick comparison tool between similar products. A standardised star-only format reinforces this lesson and reduces the cognitive load associated with comparing products across different label formats, particularly for those who struggle with interpreting the nutrition information panels.

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 Australian Dietary Guidelines (ADGs) and Eating Statement 1 of the New Zealand Eating and Activity Guidelines (NZEAG)? Please provide any consumer evidence and/or information on implementing the use of colour in the HSR symbol.

I can provide consumer evidence and/or information on implementing the use of colour in the HSR symbol.:

OzHarvest does not support FSANZ's proposed approach to including a colour on the HSR that highlights only the core foods from the ADGs. We recommend that FSANZ preserves the option of adding interpretive colour to the HSR in the next phase of mandatory implementation, based on international best practice.

The global evidence shows that including colour across the full range of front-of-pack labels improves salience and assists consumer understanding, particularly in helping people identify and avoid less healthy products (Egnell et al., 2018; Pettigrew et al., 2020; Pettigrew et al., 2023). The Health Star Rating is currently the only front-of-pack nutrition label worldwide where no colour is specified for use (Jones et al., 2019). This is a significant gap. The most well-established international example of how colour can be incorporated into a star-based system is the Nutri-Score spectrum used across Europe, which applies a graduated colour scale across all rated products.

FSANZ's proposed approach of highlighting only core foods from the Australian Dietary Guidelines in a distinct colour such as gold, while leaving all other HSR labels unspecified, does not reflect this evidence base. It has not been consumer tested. It risks confusing people who encounter many differently coloured HSR symbols with no consistent logic. And as FSANZ itself acknowledges, clear definitions of what constitutes a core food under the revised ADGs have not yet been established. We recommend not delaying mandatory implementation to resolve these definitional questions.

We also note that the HSR is not the right vehicle for educating consumers about core foods or overall dietary patterns. That work belongs in a well-funded public education campaign accompanying the release of the updated Australian Dietary Guidelines, and through food literacy programs like NEST that build lasting food literacy in the communities that need it most.

We recommend that FSANZ does not proceed with the proposed colour approach at this stage. Instead, following mandating, any further research into colour must test evidence-based options, specifically, approaches that use colour across the full star range to help consumers identify less healthy products, consistent with international best practice.

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 the CFS and section 1.2 of SD4)? Please provide reasons for your response, including any evidence on consumer use or implementation considerations.

I support/I do not support the proposed approach for the location of the HSR symbol on pack. Why/why not (include evidence on consumer use or implementation considerations)?:

OzHarvest supports FSANZ's proposed approach requiring front-of-pack placement. Front-of-pack placement is essential for the HSR to function as intended. Research consistently shows that front-of-pack nutrition labelling is more likely to be noticed, understood, and used than back-of-pack information, particularly by people making quick decisions under time pressure or with limited literacy (FSANZ SD4). For adults navigating a supermarket on a tight budget, often with children in tow, the ability to make a fast, at-a-glance assessment of a product's healthfulness depends entirely on the label being visible before the product goes in the basket. A back-of-pack or side-of-pack HSR does not meet that need.

The feasibility of this requirement is not in question. As FSANZ's own assessment confirms, 97% of products currently displaying the HSR already place it on the front of pack (FSANZ SD4). Mandatory front-of-pack placement codifies existing industry practice and closes the gap left by the remaining minority who do not comply voluntarily.

We also note that Annex 2 of the Codex Guidelines on Nutrition Labelling (CXG 2-1985) states that FOPNL should be clearly visible on the package at the point of purchase under normal conditions. Mandatory front-of-pack placement directly reflects this international standard.

Clear and enforceable placement requirements are important for another reason. Experience in other countries demonstrates that industry will exploit

ambiguity in labelling standards to reduce the visibility and impact of front-of-pack labels. Research on the implementation of warning labels in Mexico found that industry actors successfully pushed to weaken provisions around label display areas during the policy process (Crosbie et al., 2023). Strong, unambiguous placement standards in Australia's mandatory regime are essential to prevent this outcome here.

We encourage FSANZ to go further and specify placement in the top half of the principal display panel. FSANZ's own evidence review indicates potential advantages to consistent top-half positioning, including faster identification of the label and small improvements in understanding for consumers with lower health and nutrition literacy (FSANZ SD4). Given that products not yet displaying the HSR will be adopting it for the first time under the mandatory regime, there is a practical opportunity to set the right standard from the outset rather than attempting to shift established practice later.

14. Do you support FSANZ's proposed approach for the presentation and legibility of the HSR symbol (see section 4.4.3 of the CFS and section 1.3 of SD4)? Please provide reasons for your response, including any evidence on consumer use or implementation considerations.

I support/I do not support the proposed approach for presentation and legibility of the HSR symbol. Why/why not (include evidence on consumer use or implementation considerations)?:

OzHarvest supports FSANZ's proposed approach to presentation and legibility and encourages FSANZ to strengthen requirements, particularly around uniform placement in the top half of the package, to better serve consumers with lower health and nutrition literacy.

Clear, legible, and prominent labelling is a public health requirement, not a design preference. FSANZ's consumer literature review confirms that while most consumers find the HSR easy to understand, fewer report that it strongly captures their attention (FSANZ SD1). For NEST participants learning to use the HSR as a quick decision-making tool, a label that does not catch the eye cannot do its job.

Current compliance data reveals real gaps. FSANZ found that 27% of HSR symbols were inconsistent with at least one presentation criterion, with most inconsistencies arising from stylised or altered presentations that technically meet minimum requirements while reducing clarity in practice (FSANZ SD4). Experience from Mexico demonstrates that less prescriptive approaches create space for industry to exploit design flexibility in ways that reduce label effectiveness (Crosbie et al., 2023). Strong presentation requirements in Australia's mandatory regime are essential to reduce this risk.

We strongly encourage FSANZ to prescribe uniform placement in the top half of the package. FSANZ's own investigation notes that consistent top-half positioning reduces time to identify the label, and that one study found a small but meaningful improvement in understanding for consumers with lower health literacy (FSANZ SD4). Canada, Nutri-Score, and the USFDA's proposed label all require top-half or top third placement for the same reasons. With most products adopting the HSR for the first time under a mandatory regime, this is the right moment to set the correct standard, with a sufficient implementation period for products currently displaying the HSR on the bottom half to make the transition.

15. Do you support FSANZ's proposed approach for the declaration of algorithm components (see section 4.5 of the CFS and section 4 of SD5)? Please provide reasons for your response including any implications for transparency, enforcement or cost.

I support/I do not support the proposed approach for the declaration of algorithm components. Why/why not (include implications for transparency, enforcement or cost)?:

Outside OzHarvest/NEST's scope.

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.

All major impacts (to industry, consumers and government) have/have not been identified. Include evidence to support the inclusion and magnitude of other identified impacts:

Outside OzHarvest/NEST's scope.

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.

I can/cannot provide data and evidence to quantify the unquantified costs and benefits in Table 2 of SD6. :

Outside OzHarvest/NEST's scope.

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.

I agree/I do not agree with the assumptions proposed to be used to estimate the costs to industry. Please provide data and evidence to support the inclusion of alternative assumptions.:

Outside OzHarvest/NEST's scope.

19. Please make any other comments that are not related to specific questions here.

Any other comments that are not related to any of the previous questions.:

OzHarvest welcomes this proposal and the decision of Food Ministers to request FSANZ to raise a proposal to mandate the Health Star Rating system. After more than a decade of voluntary implementation, this is the right moment for this change. We offer three overarching observations from our

position as a frontline nutrition education program working with some of Australia's most vulnerable communities.

First, mandating is a non-negotiable priority: The HSR has plateaued at under 40% voluntary uptake despite industry targets. Selective adoption by some manufacturers has turned a public health tool into a marketing device. Mandating is the single most significant action available to restore the HSR system's integrity and deliver equal access to clear nutrition information for all Australians. We urge FSANZ to progress mandatory legislation without further delay.

Second, equity must be centred in every design decision: Every choice about the HSR's design, location, colour, and legibility has a disproportionate impact on people with lower health and nutrition literacy, people experiencing food insecurity, and people from CALD backgrounds. These are the communities OzHarvest's NEST program serves. A simpler, more consistent, prominently placed label is a health equity imperative. We ask FSANZ to explicitly assess the equity implications of each design decision before finalising the mandatory standard.

Third, the HSR needs to work alongside nutrition education, not instead of it: The HSR is a useful tool, but it works best in the hands of people who understand how to use it. OzHarvest NEST reaches approximately 2,500 participants each year across eight cities and regions, teaching adults how to read food labels, compare products, and make nutritious choices on a budget. A standardised, mandatory HSR system strengthens this education. When every eligible product displays a health star rating, participants can immediately apply what they have learned at NEST to every shopping trip. We encourage Food Ministers and FSANZ to consider how front-of-pack labelling policy and community nutrition education programs can be better aligned and jointly resourced.

We agree with the PHAA, which has called on governments to commit to continuing, strengthening, funding, and expanding the use of the HSR system to support public health impact, and to develop a broader National Food and Nutrition Policy supporting comprehensive, multi-sectoral and evidence-based nutrition policies and programs (PHAA, 2023b). The OzHarvest NEST team strongly endorses this call.

Supplementary data or information

You may upload a supporting document here.:

No file uploaded

Reference list

You may provide your reference list here, if any.:

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Confidential information

Do you wish to provide confidential information as part of your submission?

No

Feedback

What is your level of satisfaction using FSANZ's Consultation Hub to complete your submission?

Satisfaction level - Guidance provided to make your submission:

Very satisfied

Satisfaction level - Using the Consultation Hub:

Very satisfied

Satisfaction level - Time and effort:

Very satisfied

Satisfaction level - Overall satisfaction:

Very satisfied

If you wish to explain your responses, please do so below.: