

Health Star Rating Label Uptake in NZ: Analysis in 2023 relative to target

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30.4% (4050/13,306) of 'Intended' products carried a HSR in mid-2023, well below the target of 50% by Nov 2023.

Purpose: To determine progress towards meeting the interim target of a HSR displayed on 50% of 'Intended' New Zealand packaged food products by November 2023.

Introduction

The Health Star Rating (HSR) system is a government-led voluntary front-of-pack nutrition label introduced in 2014 in New Zealand (NZ) and Australia. It aims to guide consumers towards healthier choices when selecting packaged food and beverage products¹. 'Intended' products are defined as those products permitted to use the HSR, required to carry a Nutrition Information Panel, and whose nutrition composition can vary as defined in the HSR Style Guide version 8². The Style Guide also outlines products that must not display a HSR such as certain Special Purpose Foods (infant formula products, food for infants, formulated supplementary foods) along with beverages containing alcohol or those that are marketed as a non-alcoholic variant of an alcohol brand. There are some products that are permitted, but not intended to carry a HSR, such as herbs and spices.

In 2019, a five-year formal review of the system was undertaken with ten recommendations to continue and strengthen the HSR³. One review recommendation was for the HSR to remain voluntary, but with clear uptake targets set. The government set a series of interim targets for uptake on products from 2023 towards the final target of a HSR being displayed on 70% of 'Intended' products by the end of 2025³. The first interim target stated that by 14 November 2023, 50% of 'Intended' products should have displayed the HSR. This research aimed to assess if the NZ packaged foods supply met this interim target.

In addition, we analysed the uptake of the HSR by product category and the mean estimated HSR for products that carried a HSR compared with products that did not.

Methods

This analysis used data from the Nutritrack database⁴, an annual inventory of all packaged food and beverage products displaying a Nutrition Information Panel and available for sale in major NZ supermarket chains. Data were collected between April and July 2023. Products were included regardless of package size (e.g., all package sizes of the same product were included). Products that displayed the 'energy icon only' were considered to 'not display a HSR' on front-of-pack in line with the five-year review recommendation to phase out that label option. Estimated HSR's were calculated using data provided on the Nutrient Information Panel in accordance with the HSR Style Guide². Where information was required to calculate a HSR but was not provided on the label (e.g., fibre, fruit, vegetables, nuts, legumes) an algorithm was used to estimate these variables for inclusion.

Products were categorised as either excluded, permitted, or intended as defined by the HSR system and in consultation with the Ministry for Primary Industries to align as far as possible with the approach taken of government monitoring.

Criteria used to categorise products as intended or permitted to carry a HSR label or excluded from carrying a HSR label.

'Excluded' Products excluded from carrying a HSR	<ul style="list-style-type: none">○ Infant formula products.○ Food for infants – Standard 2.9.2 of the Australia NZ Food Standards Code.○ Formulated Supplementary Foods for young children.○ Formulated Supplementary Sports Foods.○ Foods for Special Medical Purposes.○ Alcohol/Kava – includes products marketed as a non-alcoholic variant.○ Products that are not eligible to carry nutrient content claims and health claims.○ Dietary supplements.
'Permitted' Products permitted, but not intended to display a HSR	<ul style="list-style-type: none">○ Fresh value-added products, e.g., packaged fruits, vegetables, meat, poultry and seafood with no added ingredients, and pre-packaged rolls and sandwiches.○ Products exempt from a Nutrition Information Panel (NIP) – herbs and spices (without salt), vinegar, salt, pepper, plain tea and coffee, herbal infusions, gelatine, jam setting compounds and packaged water.○ Small packages excluded from carrying a NIP.○ Foods which cannot vary in nutritional composition, e.g., sugar, eggs, baking additives.
'Intended' Products intended to display a HSR	<p>Products that do not meet 'Excluded' criteria and are required to have a NIP and:</p> <ul style="list-style-type: none">○ That can vary in nutritional composition – this includes products for which composition can be altered (multi-ingredient processed packaged foods) or similar foods which can vary in composition (for example single ingredient foods such as flours, cornstarch, milks, grains, legumes, cocoa and carob powders, edible oils and canned fruits and vegetables).○ Foods with added salt, fat, sugar/sweetness.○ Foods whose processing changes the nutritional composition significantly compared to the unprocessed variety, e.g., dried and juiced fruit and vegetables.○ Meal replacements and formulated supplementary foods.

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Results

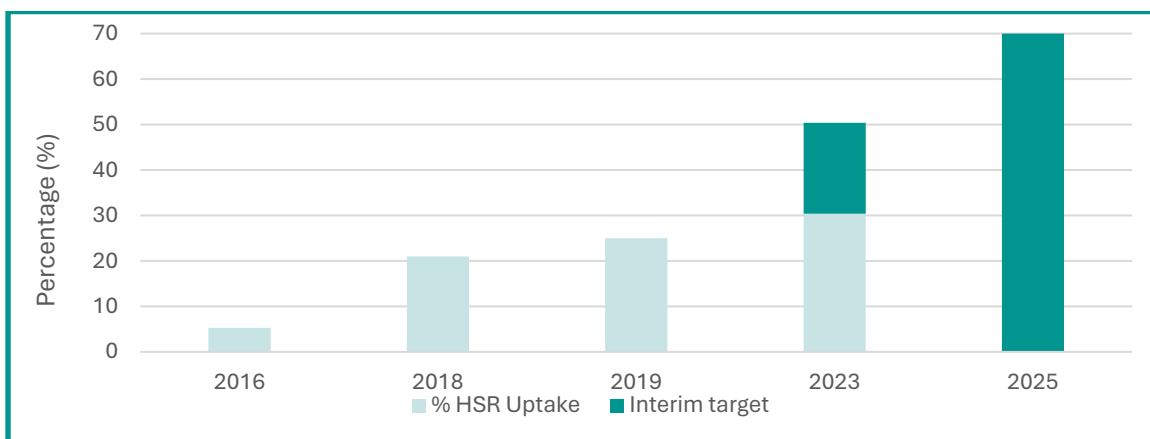
Overview

There were 14,373 products included in the analysis. In the second quarter of 2023:

- 2.1% (301) were **'Excluded'** from carrying a HSR,
- 5.3% (766) were **'Permitted'** but not intended to carry a HSR,
- 92.6% (13,306) were **'Intended'** to carry a HSR,
- 29.9% (4,212/14,072) of **'Permitted' and 'Intended'** products carried a HSR
- **30.4%** (4050/13,306) of 'Intended' products carried a HSR, well below the target of 50% by November 2023.



HSR uptake for 'Intended' products compared to targets



Two years after the HSR system was adopted in 2014, 5.3% of packaged foods surveyed displayed HSR labels⁵, and this increased to 21% in 2018⁶ and to 25% in 2019⁷. Despite the target set by the government for 50% of 'Intended' products to display the HSR on pack before

the end of November 2023, just 30.4% of products displayed the HSR in the second quarter of 2023. The mean estimated HSR of 'Intended' products that display a HSR is higher (2.9) than the mean of all 'Intended' products (2.6).

HSR uptake for 'Intended' products – category breakdown

Category	Total no. of 'Intended' products in category	No. of 'Intended' products with HSR displayed	HSR uptake (%)	Mean estimated HSR of 'Intended' products with HSR displayed	Mean estimated HSR of 'Intended' products that have an estimate
Convenience foods ¹	673	336	49.9	3.4	3.3
Fish and seafood products	457	209	45.7	3.8	3.4
Cereal and cereal products	1351	596	44.1	3.7	3.3
Snack foods ²	583	239	41.0	2.6	2.2
Fruit and vegetables	1594	577	36.2	4.0	3.5
Meat and meat products	969	350	36.1	3.1	2.4
Bread and bakery products	1592	520	32.7	2.3	2.1
Edible oils and oil emulsions	285	78	27.4	3.1	2.8
Dairy	1716	427	24.9	3.5	2.7
Special foods ³	194	46	23.7	4.0	4.0
Sauces and spreads	1619	352	21.7	3.2	2.3
Non-alcoholic beverages	1288	215	16.7	2.2	2.0
Confectionery	880	96	10.9	0.9	0.9
Sugars, honey, and related products	105	9	8.6	1.0	1.3
Total no. of products	13306	4050	-	3964*	12787**
Average			30.4	2.9	2.6

*86 'Intended' products that displayed a HSR label on front-of-pack did not have a HSR estimate.

**519 'Intended' products did not have a HSR estimate.

¹Convenience foods include meal kits, ready meals, frozen foods, pre-prepared salads and sandwiches, and soups.

²Snack foods include savoury crisps and snack foods.

³Special foods include breakfast beverages, diet drink mixes, diet soup mixes, meal replacements, other fitness or diet products, protein & diet bars, protein powders.

Highest and lowest performing categories for displaying HSR on front-of-pack

As a general trend, the mean estimated HSR score was higher for products that displayed a HSR compared with products that did not. HSR uptake for 'Intended' products was assessed by product category, with 'convenience

foods' having the highest percentage of products displaying a HSR on front of-pack (49.9%) and 'sugars, honey, and related products' the lowest (8.6%).

Conclusion and recommendations

In 2023, only 30.4% of packaged foods in NZ that were intended to display a HSR did so (data collection completed in July 2023). In 2019, 25% of products displayed a HSR (also using the Nutrtrack database), indicating very slow uptake in the last 4 years⁷. In comparison, a 2023 study of the Australian packaged food supply using similar methodology, a similar database (FoodSwitch), and data collection timeframe (completed in June 2023), found that 36% of 'Intended' products displayed a HSR⁸. Of note – earlier research indicated that in 2019 almost all private label products in New Zealand carried a HSR⁹.

Not surprisingly, the categories more likely to display a HSR were those generally considered healthier, 'fish and seafood products' and 'cereal and cereal products' as well as 'convenience foods' while those least likely to display a HSR were 'non-alcoholic beverages', 'confectionery' and 'sugars, honey, and related

products'. Companies are more likely to voluntarily display the HSR label on their products when their products are calculated to have higher/more stars, suggesting it is being used for marketing benefits. Similar findings were noted in the Australian study mentioned previously⁸.

We call upon the government to make HSR mandatory as at the current rate of progress, it is highly unlikely that the target of 70% will be reached by 2025. Making HSR mandatory is necessary to allow consumers to use the HSR to compare products, the intended aim of the policy. Mandatory display could encourage companies that do not currently display HSR labels, due to their low estimated rating, to reformulate some products to increase their HSR¹⁰. Therefore, this change would have the potential to improve the health of the whole NZ population.

Limitations of the research

Data on products were collected in April – July 2023, therefore there may have been more products that carried a HSR by the target date of November 2023. However as only 30.4% of 'Intended' products carried a rating, it is highly unlikely that the uptake target of 50% would have been reached in the remaining 4 months.

The products in the Nutrtrack database are collected from four major supermarket chains, therefore do not include all packaged products in the NZ food supply. However, the data was collected from large stores representative of the largest supermarket chains in NZ (New World, Countdown, Pak'N'Save, Four Square).

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