



Cancer Society NZ
39 The Terrace
Wellington 6011

Front-of-Pack Labelling Secretariat
Department of Health, MDP 707
GPO Box 9848,
Canberra ACT 2601,
Australia
Phone: 1800 099 658
Email: frontofpack@health.gov.au
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COMMENTS ON IMPLEMENTATION PLAN FOR THE HEALTH STAR RATING (HSR) SYSTEM CHANGES

Dear Front-of-Pack Labelling Secretariat,

Thank you for the opportunity to comment on the implementation of changes resulting from the Health Star Rating System Five Year Review. Please see comments below on behalf of the Cancer Society of New Zealand. Overall given the clear public health benefits for the implementation of the front of pack Health Star Rating system the Cancer Society NZ supports:

- The current start date 1 October 2020 being maintained. Covid does not justify a delay to that date, particularly when then there is a 2-year implementation period.
- HSR being mandatory as this will drive consumer understanding, ensure a faster uptake rate and over time encourage product reformulation of products so that they are healthier.”

The Cancer Society of New Zealand (NZ) is a non-profit organisation which aims to minimise the incidence and impact of cancer on all those living in New Zealand. We work across the cancer continuum with key work areas that include health promotion, supportive care, provision of information and resources, and funding of research. Cancer is New Zealand’s single biggest cause of death¹. The Cancer Society of NZ is providing comment on the front of pack HSR implementation as obesity is the main preventable cause of cancer after tobacco². Food labelling regulation is one of the obesity reduction strategies recommended by both the World Health Organisation (WHO) and the World Cancer Research Fund International³. This is an effective and equitable intervention to help people understand more about food products and reduce the sugar, salt and fat manufacturers add to our food.

The Cancer Society has previously made a number of submissions with evidence-based recommendations to improve the HSR nutrient profiling system. We strongly support maintaining the current start date and 2-year implementation period for the revised HSR system. We do not support delaying the start date. We support implementation of the changes as soon as possible as these will ensure the HSR is more strongly aligned with healthy food patterns and dietary

guidelines⁴⁵. Delaying the revised system would further weaken the impact of the HSR as an effective nutrition intervention. Manufacturers do have the opportunity under this voluntary system to opt out if the implementation period is too prohibitive. Many HSR will not change. Other products may receive higher scores and those manufacturers may want the benefit of this sooner rather than later. The Cancer Society feels the starting date and lengthy implementation period remains fair and does not think Covid 19 should be a justification to delay wider uptake.

The current voluntary HSR system has had limited success and uptake by industry with HSR being skewed to foods which are already healthier⁶⁷. This potentially has increased diet and health inequities. Māori, Pacific, and people on low incomes in NZ do not find nutrition labels and front-of-pack labels useful possibly due to the perception that foods using a front-of-pack label are more expensive⁸. Front-of-pack labelling would work best for consumers when available on all products^{9,10}. Making the HSR system mandatory will drive reformulation of all foods, healthy and unhealthy, and make HSR more relevant to Māori, Pacific, and low income consumers¹¹. The Cancer Society therefore supports making HSR mandatory to get the full benefit and uptake for both industry and consumers. Therefore, we advocate for the HSR to achieve the 70% uptake target by 2025.

The Cancer Society aligns with the concerns of others that industry self-regulation is compromising the impact of this preventative health intervention^{12,13}. Industry can use food labels as a way to make people think the food is healthy when, in reality it's not^{14,15}. Current labels are not good enough to help people identify which products are healthy. A consistent, mandatory front-of-pack labelling system is needed as soon as possible.

While this engagement does not seek input on the changes to the algorithm, we strongly advocate any submissions received regarding requests to change the algorithm to reduce its public health impact should not be considered. The Health Star Rating is only one of a handful of front-of-pack labelling processes worldwide that have allowed extensive involvement by industry nutrient profiling criteria¹⁶. We note that the World Health Organisation in its [Guiding Principles and Framework Manual on FOP](#) now explicitly recommends that industry engagement on front-of-pack labelling is kept separate from the process of developing scoring criteria. We are aware that industry will be involved in this submission process and will likely lobby for a delay. The Cancer Society NZ would like to caution the Front-of-Pack Secretariat against delaying necessary improvements to this public health intervention, which has already been consulted on extensively. This could potentially further undermine the HSR as an effective intervention. We recommend that commercial conflicts of interest are noted and given less weighting.

The Covid-19 pandemic has had an impact on the health system, including non-Government Organisations like the Cancer Society. During the pandemic many health organisations, including our own, redeployed staff to focus on the pandemic. Ensuring food labels are honest will help reduce the burden on health services by stimulating food reformulation, increasing availability and identification of healthier options^{17,18}. Food security, or the ability to easily access enough healthy food every day is closely linked to nutritional dietary quality, weight, and health¹⁹. Many families and individuals living with economic and social disadvantage do not have equitable access to healthy food systems. Covid-19 has further highlighted the importance of food security²⁰ and resilience. The New Zealand Government has recently announced a \$32 million budget to help build food secure communities²¹. Strengthening the HSR as a further public health nutrition intervention should be of

upmost priority as a cost-effective way to promote a healthier and more sustainable food supply for all²².

Yours Sincerely,



Lucy Elwood
CEO Cancer Society NZ

¹ New Zealand Ministry of Health website: <https://www.health.govt.nz/your-health/conditions-and-treatments/diseases-and-illnesses/cancer>. Accessed 28 November 2019.

² Ministry of Health Website: <https://www.health.govt.nz/nz-health-statistics/health-statistics-and-data-sets/obesity-statistics> Accessed January 30 2018.

³ World Cancer Research Fund website: <https://www.wcrf.org/int/policy/nourishing-database>. Accessed 28 November 2019.

⁴ Food-based approaches to meeting vitamin and nutritional needs. Accessed: <http://www.fao.org/3/Y2809E/y2809e08.htm>

⁵ Position of the Academy of Nutrition and Dietetics: Total Diet Approach to Healthy Eating. Accessed: [https://jandonline.org/article/S2212-2672\(12\)01993-4/pdf](https://jandonline.org/article/S2212-2672(12)01993-4/pdf)

⁶ Ministry for Primary Industries, New Zealand Government. (2018). The Health Star Rating system in New Zealand 2014-2018: System uptake and nutrient content of foods by HSR status. New Zealand Food Safety Technical Report No: 2018/09. Wellington, New Zealand.

⁷ Ministry of Primary Industries. *The Health Star Rating System in New Zealand 2014-2018*. <https://www.mpi.govt.nz/dmsdocument/31635/direct>.

⁸ Signal L, Lanumata T, Robinson J-A, Tavila A, Wilton J, Ni Mhurchu C (2008). Perceptions of New Zealand nutrition labels by Māori, Pacific and low-income shoppers. *Public Health Nutrition* 11(7), 706-713.

⁹ Kelly B, Jewell J. What is the evidence on the policy specifications, development processes and effectiveness of existing front-of-pack food labelling policies in the WHO European Region? Copenhagen: WHO Regional Office for Europe; 2018 (Health Evidence Network (HEN) synthesis report 61).

¹⁰ World Cancer Research Fund International (2019). Building momentum: lessons on implementing a robust front-of-pack food label. Available at wcrf.org/buildingmomentum

¹¹ Signal, Louise, et al. "Perceptions of New Zealand nutrition labels by Māori, Pacific and low-income shoppers." *Public Health Nutrition* 11.7 (2008): 706-713.

¹² Sharma, L. L., Teret, S. P., & Brownell, K. D. (2010). The food industry and self-regulation: standards to promote success and to avoid public health failures. *American Journal of Public Health*, 100(2), 240-246.

¹³ Food labels may be designed to fool. Stuff news. Accessed: <https://www.stuff.co.nz/business/91735074/heres-how-to-get-to-the-truth-about-what-you-eat>

¹⁴ Northup, T. (2014). Truth, lies, and packaging: how food marketing creates a false sense of health. *Food Studies*, 9.

¹⁵ Hamilton, V. N. (2018). DETERMINING MILLENNIAL FOOD BUYING PREFERENCES: BASED ON PRODUCT MARKETING WITH "BUZZWORDS".

¹⁶ Jones A, Neal B, Reeve B, et al. Front-of-pack nutrition labelling to promote healthier diets: current practice and opportunities to strengthen regulation worldwide. *BMJ Global Health* 2019;4:e001882. doi:10.1136/bmjgh-2019-001882.

¹⁷ Ministry of Primary Industries. *The Health Star Rating System in New Zealand 2014-2018*. <https://www.mpi.govt.nz/dmsdocument/31635/direct>.

¹⁸ Eyles H, Jiang Y, Blakely T, et al. Five year trends in the serve size, energy, and sodium contents of New Zealand fast foods: 2012 to 2016. *Nutr J*. 2018. doi:10.1186/s12937-018-0373-7

¹⁹ Ministry of Health. Household Food Insecurity Among Children: New Zealand Health Survey [Internet]. Wellington; 2019. Available from: <https://www.health.govt.nz/system/files/documents/publications/household-food-insecurity-among-children->

[new-zealand-health-survey-jun19.pdf](#).

²⁰ Food security is when everyone has access to healthy, affordable and culturally appropriate food, even in the event of a shock or disruption to a food system (such as an earthquake or pandemic). Tendall, D. & Joerin, J. & Kopainsky, Birgit & Edwards, Peter & Shreck, A. & Le, Quang Bao & Krütli, Pius & Grant, M. & Six, J.. (2015). Food system resilience: Defining the concept. *Global Food Security*. 6. 17-23.

²¹ https://www.msd.govt.nz/what-we-can-do/community/food-secure-communities/index.html?fbclid=IwAR03DAUNkWPT8bWsaL_B5f7yU5Cf74Jbt_mqcuaZ4PDZ-YTWpFawcy0ZcZk

²² Ministry of Primary Industries. Health Star Rating. <https://www.mpi.govt.nz/food-safety/food-safety-for-consumers/understanding-food-labels/health-star-ratings/>. Published 2019.