Submissions Guide to FSANZ Health Star Rating Mandate Survey 2026

See below a list of the questions included in the FSANZ survey. **Questions relevant to the call for edible oils to be excluded are highlighted in yellow, with potential wording included below.** The questions that are not highlighted do not need to be answered when completing the FSANZ survey but you can answer them if you choose to do so.

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?
    - We support clear, consistent front-of-pack labelling that helps consumers make healthier food choices.
    - However, the current Health Star Rating algorithm is not fit for purpose for edible oils. In this category, the algorithm gives disproportionate weight to saturated fat, while not adequately accounting for degree of processing, refining, bioactive compounds, oxidative stability or the broader evidence base for extra virgin olive oil (EVOO) and EVOO-rich dietary patterns.
    - In the edible oils category, a mandatory HSR could have an opposite effect than the intention – it could drive consumers to choose less healthy options or confuse them further.
    - Therefore, edible oils and cooking fats should be exempt from mandatory display requirements until the algorithm is reviewed and updated to better reflect the evidence.

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.

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.

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/we/[insert company] do not support the current approach to calculating the HSR in category 3 (fats and edible oils)
    - Edible oils are mostly single-ingredient culinary products. They are naturally energy dense and contain negligible sugar and sodium. As a result, saturated fat becomes the dominant factor determining the star rating. The current algorithm does not adequately account for degree of processing, refining, oxidative stability, the retention of bioactive compounds, or the significant body of evidence on the health benefits of different edible oils.

- This can lead to EVOO receiving a lower HSR than some more heavily refined plant oils, despite the broader evidence base supporting EVOO and EVOO-rich dietary patterns.
- This produces an outcome that is inconsistent with decades of nutrition research and risks misleading consumers.

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.

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.

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.

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.

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.
    - FSANZ could consider an algorithm override for category 3 (fats and edible oils) as this is a category where the current algorithm fails.
    - If this is out of scope for the current consultation period, then the category should be exempt from the mandate until a full review of the algorithm is completed.

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.

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.

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.

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.

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.

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

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.
    Additional impacts include the following:
    - Potential reduced consumer trust in the HSR system if outcomes appear inconsistent with established nutrition science and advice from trusted health professionals – specifically in the case of category 3 (fats and edible oils).
    - Impacts on manufacturers producing foods in categories with known algorithm anomalies, such as extra virgin olive oil, should also be considered. These anomalies should not be treated as minor or acceptable discrepancies, as they can have real commercial and reputational consequences. In practice, many nutrition, procurement and food service policies use a Health Star Rating of 3.5 stars as a threshold for determining whether a product is considered a healthier choice. Products scoring below this threshold may be restricted or penalised in settings such as school canteens, childcare centres, government-funded programs and institutional menus. Retailers may also use HSR as a measure of product healthfulness when determining promotional eligibility, advertising placement or health-focused merchandising. As a result, an extra virgin olive oil product that receives less than 3.5 stars due to an algorithm anomaly could be excluded from promotions, recipes, menus or advertising opportunities, despite being a natural, minimally processed food with a strong evidence base for health benefits. This demonstrates that inaccuracies in the algorithm can have material impacts on businesses and consumers, rather than being merely technical differences in scoring.

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.

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.

19. Please make any other comments that are not related to specific questions here.
    - We are calling for fats and edible oils to be exempt from mandatory implementation of the Health Star Rating system, until the algorithm has been

independently reviewed and updated to reflect the best quality nutrition science.

- In this category, edible oils are largely single-ingredient products with negligible sugar and sodium, meaning small differences in saturated fat can materially affect the final HSR. As the algorithm currently stands, a difference of less than 1 g saturated fat per 100 g can result in a half-star difference. This means that extra virgin olive oils, which are natural products with inherent compositional variation, may receive different HSR scores depending on whether saturated fat is calculated using a broad nutrition composition database, such as FSANZ's, or determined through product-specific laboratory analysis. For example, one EVOO may receive 3 stars while another receives 3.5 stars, despite both being the same minimally processed food category. This demonstrates that the current algorithm can produce inconsistent outcomes that do not meaningfully reflect differences in nutritional quality.
- Extra virgin olive oil is not simply a source of fat. It is a minimally processed food that retains biophenols and other bioactive compounds, many of which are reduced or removed during the refining process in other oils.
- A substantial body of high-quality evidence supports EVOO and EVOO-rich Mediterranean dietary patterns as cardioprotective, neuroprotective, and anti-inflammatory. These types of health benefits are not seen to the same degree in other edible oils.
- The current HSR algorithm does not reflect this broader evidence. Instead, it reduces the oils category largely to a saturated-fat calculation.
- A lower HSR for extra virgin olive oil than for highly refined seed oils risks misleading consumers and undermining confidence in the HRS system overall.