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Front-of-Pack Labelling Secretariat
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2 October 2020

COMMENTS ON: Health Star Rating (HSR) System Changes: Calculator and Style Guide

Dear Front-of-Pack Labelling Secretariat

Thank you for the opportunity to comment on the HSR Calculator and Style (draft) Guide. Please see comments below on behalf of the Cancer Society of New Zealand (NZ).

The Cancer Society is a non-profit organisation which aims to minimise the incidence and impact of cancer in Aotearoa, New Zealand. We work across the cancer continuum in health promotion, supportive care, provision of information and resources, and funding of research.

Unhealthy diet and weight are the second leading cause of preventable cancer death in Aotearoa(1,2). Strong evidence links high body weight with twelve cancers including oesophagus, pancreatic, colorectal, breast, endometrium, kidney and menopausal breast cancer(3). The cancer burden is increasing and inequitable.

Nutritious food and a healthy weight can each play a key role in improving health and cancer risk(3). However unhealthy processed food is increasingly normalised and accessible in our environments and more so in low income areas(4-7). The Cancer Society is providing comment on the front of pack HSR calculator and style guide to support a way to address nutrition and cancer risk. Food labelling regulation is an obesity reduction strategy recommended by both the World Health Organisation (WHO) and the World

Cancer Research Fund International to effectively and equitably inform people about food composition and encourage industry reformulation(8,9).

Overall, the Cancer Society NZ supports the content and intent of the HSR Calculator and Style Guide for use by food manufacturers. However, under Section 4, ‘Does this section make the process to obtain a HSR for your product clear?’ we have a comment relating to Step 1, Determine whether the product is eligible for an automatic HSR.

We are confused by the section on ‘*Minimally processed fruit and vegetables*’ where minimally processed fruit and vegetables are awarded an automatic HSR of 5 stars *but not* fresh fruit and vegetables.

The definition of and allocation of HSR of 5, excludes fresh fruit and vegetables and suggests the need for use of the HSR calculator to determine star rating. *Note: Fresh fruit and vegetables are not captured under this definition. Determining the star rating of these products would require use of the HSR calculator”.*

The Cancer Society is clear that fresh fruit and vegetables should be included in Section 4 and automatically receive HSR of 5 as applies to minimally processed fruits and vegetables. It is our understanding the intent was for fresh fruit and vegetables (with no addition of sugar, salt or fat) to also automatically receive a HSR of 5. The Cancer Society does not support a HSR system that gives minimally processed fruit and vegetables a higher HSR than their fresh alternatives.

Modifying the definition to include fresh fruit and vegetables is important to ensure public trust and integrity in the HSR system as a key public health nutrition intervention to promote a healthier and more sustainable food supply for all.

Dr Leanne Young, Dr Sally Mackay and Fiona Sing from the School of Population Health, University of Auckland have asked us to include their support for this submission.

Yours sincerely



Shayne Nahu

Manager Advocacy and Wellbeing

Bibliography

1. Ministry of Health. Mortality 2016 Data Tables [Internet]. Wellington; 2019. Available from: <https://www.health.govt.nz/publication/mortality-2016-data-tables>
2. Ministry of Health. New Cancer Registrations 2016 [Internet]. Wellington NZ; 2018. Available from: <https://www.health.govt.nz/publication/new-cancer-registrations-2016>
3. World Cancer Research Fund. Diet, Nutrition, Physical Activity and Cancer: a Global Perspective: A summary of the Third Expert Report. American Institute for Cancer Research. 2018.
4. Sushil Z, Vandevijvere S, Exeter DJ, Swinburn B. Food swamps by area socioeconomic deprivation in New Zealand: a national study. *Int J Public Health*. 2017;
5. Signal L, Barr M, Smith M. Evidence Snapshot: What Can be Done to Protect Our Children from Unhealthy Food Marketing? [Internet]. 2018. Available from: <http://www.healthyaucklandtogether.org.nz/assets/Marketing-to-children/Evidence-Snapshot.pdf>
6. Vandevijvere S, Molloy J, Hassen de Medeiros N, Swinburn B. Unhealthy food marketing around NZ schools: a national survey. *Int J Public Health*. 63(9):1099-107.
7. Vandevijvere S, Mackay S, D'Souza E, Swinburn B. How Healthy are NZ Food Environments? A comprehensive assessment 2014-2017 How healthy are New Zealand food environments? 2018 Executive Summary [Internet]. 2018 [cited 2019 Dec 16]. Available from: <https://figshare.com/s/31a25e34bab1cae6f38a>
8. World Cancer Research Fund International. Recommendations and public health and policy implications [Internet]. 2018. Available from: <https://www.who.int/end-childhood-obesity/publications/echo-report/en/>
9. World Health Organisation. Cancer, Cancer Prevention [Internet]. Available from: <https://www.who.int/cancer/prevention/en/>