Australian Experience of using HSR

"Warning Labels or Health Star Rating (HSR) on Unhealthy Food Products: What Should India Choose?"

Mark Lawrence
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Declarations for last 5 years:
- No commercial interests
- Advisory and membership roles related to food and nutrition policy activities*

* I alone am responsible for the views expressed in this presentation.

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Background: The proliferation of ultra-processed foods

Globalization and Health

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Food systems transformations, ultra-processed food markets and the nutrition transition in Asia

Phillip Baker[1*] and Sharon Friel[1,2]

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68% of Indian ultra-processed food products have excess salt, sugar: Study

India clocks the highest growth rate for ultra-processed food and beverages. From 2006-2019, the retail value of packaged junk food and soft drinks in the country grew by 42 times.

ETHealthWorld · December 02, 2021, 13:54 IST

INDIAN PEDIATRICS

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Saturday March 5th 2022

RESEARCH PAPER

Indian Pediatr 2020;57: 712-714

Intake of Ultra-processed Foods Among Adolescents From Low- and Middle-Income Families in Delhi

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Dietary Guidelines for Indians
- A Manual

NATIONAL INSTITUTE OF NUTRITION
Indian Council of Medical Research
Hyderabad - 500 007, INDIA

"The shift from traditional to 'modern' foods, changing cooking practices, increased intake of processed and ready-to-eat foods, intensive marketing of junk foods and 'health' beverages have affected people's perception of foods as well as their dietary behaviour." (Page ii)

"Since people consume food, it is essential to advocate nutrition in terms of foods, rather than nutrients."
(Page 1)

Metrics for assessing a food's 'healthiness'

"The number of stars is determined using a calculator (driven by an algorithm) designed to assess **positive and risk nutrients** in food"
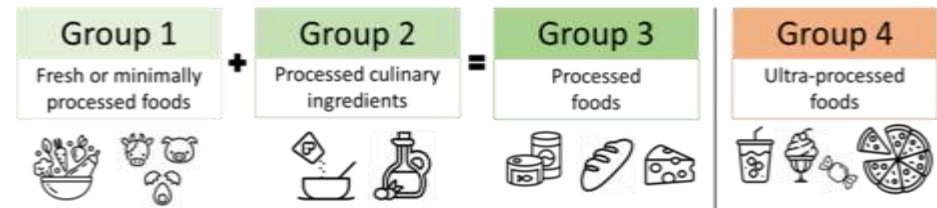
[Nutrient profiling]

Group 1		Group 2		Group 3		Group 4
Fresh or minimally processed foods	+	Processed culinary ingredients	=	Processed foods		Ultra-processed foods

[Food processing profiling]

A selection of nutrition science considerations in FOPL decision-making

1. People eat foods not nutrients

2. Food is more than the sum of the nutrients it contains

3. Need to consider the nature of the food 'vehicle' within which nutrients are delivered

4. Food processing concerns are not just about 'risk' nutrients
   1. The influence of processing on the physical structure of the food matrix is an independent risk for adverse health outcomes, eg Hall et al, 2019

4. The Australian experience with the HSR

Decision-making in Australia towards which FOPL to select was controversial

Incentivising the use of non-nutritive sweeteners?

Incentivising the use of protein isolates to attract higher HSRs?
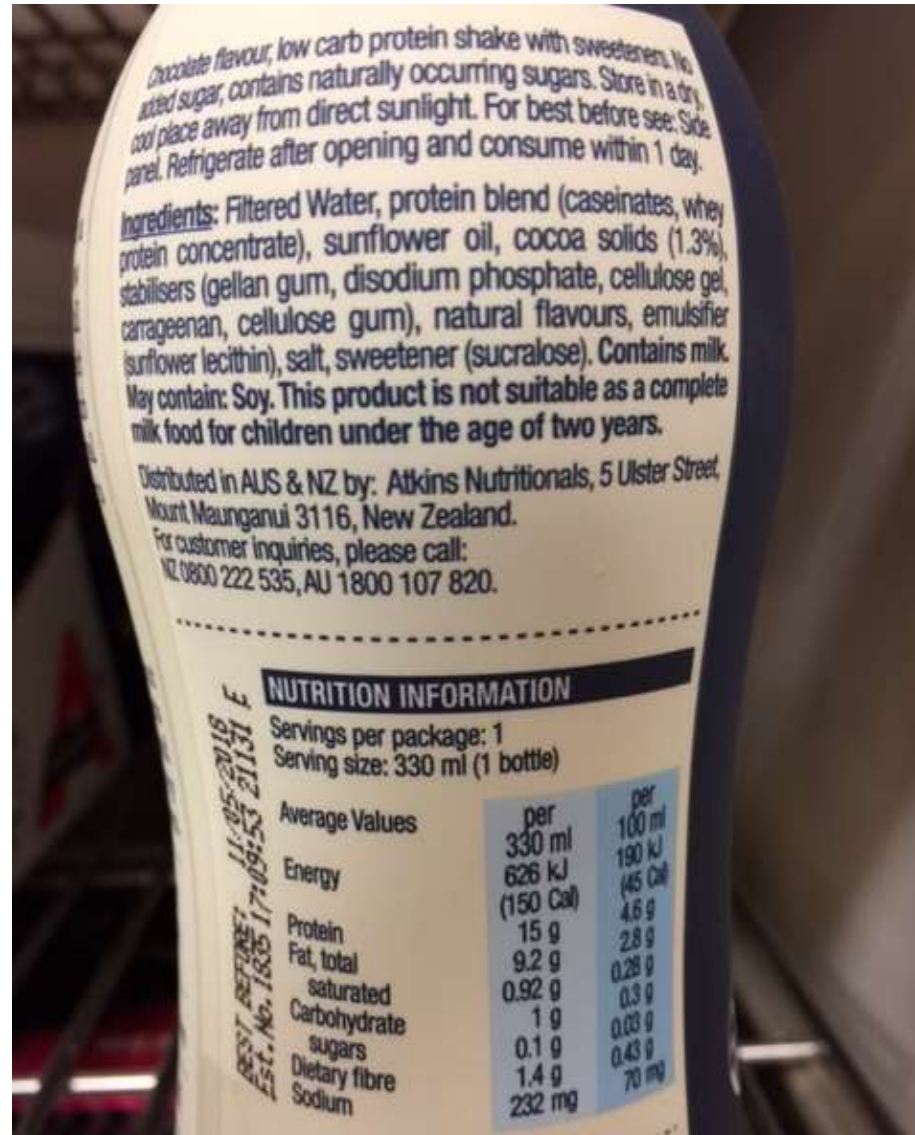
Incentivising the use of added fibre to attract higher HSRs?

DETAILED DESCRIPTION | NUTRITIONAL INFO | **INGREDIENT LIST** | FREE FROM | Reviews (0)

Brekky Heroes Choc Boulders is made with:

Rice Flour, Cane Sugar, Whole Grain Sorghum Flour, Maize Flour, Cocoa Powder (5%), Chickpea Fibre, Psyllium Husk, Flavour, Salt, Canola Oil, Emulsifier (Sunflower Lecithin).

May Contain Milk.

This product does not contain any animal-derived ingredients.

Minimally processed foods receiving low HSR

Promoting 'Health halos'?

73% of ultra-processed foods displaying HSRs in Australia have ≥ 2.5 stars

Evaluating Nutrient-Based Indices against Food- and Diet-Based Indices to Assess the Health Potential of Foods: How Does the Australian Health Star Rating System Perform after Five Years?

Sarah Dickie *, Julie L. Woods, Phillip Baker, Leonie Elizabeth and Mark A. Lawrence

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Analysing the use of the Australian Health Star Rating system by level of food processing

Sarah Dickie*, Julie L. Woods and Mark Lawrence

Concerns about the evidence from an influential HSR study

WILEY **obesity**reviews

A comparison of the healthiness of packaged foods and beverages from 12 countries using the Health Star Rating nutrient profiling system, 2013–2018

WILEY **obesity**reviews

Interpretive nutrient profiling algorithms are a limited tool for assessing the healthiness of countries' packaged food and beverage supplies, and the conclusions are not substantiated by

- Claimed HSR, "well suited to a comparative analysis of packaged foods and beverages available in different countries"

- Lacked nutrition science analysis
- Products from India represented just 2.1% of the foods analysed
- Absence of statistical tests
- no information is presented on representativeness of the data collected from India

5. Some observations about the IIM report

What the report did

It asked the following RQs (and used a powerful study design):

- Which FOPL is simple, easy to recognize and to understand?
- Which FOPL has a greater impact on customer behavior in terms of purchase intention?

What the report did NOT do

It did NOT consider the validity and limitations of the nutrition science and concepts that underpin the selected FOPLs (it appears that that was taken as a given)

Why does this matter to FOPL decision-making?

Although knowing consumers' responses to different FOPL formats is helpful

Knowing whether the nutrition science and concepts which underpin an FOPL are valid is the priority consideration for FOPL decision-making

If the nutrition science and concepts are flawed, then consumer responses are irrelevant to decision-making as there is a risk the FOPL will be ineffective and promote unintended consequences

Conclusion

- Nutrition science has a history of well-intended policy activities, but ineffective and unintended consequences

- Currently the Australian experience is that the HSR is inadvertently creating a health halo for ultra-processed foods

- Nutrition science is complex, fit-for-purpose activities are most likely to be effective and safe, eg warning-based systems:

  1. Hybrid model that combines NOVA and nutrient profiling (Dickie et al, in preparation, 2022)

  2. 'Vertical hierarchy decision tree' (Fardet and Rock. EJCN, 2022)

  3. Chilean warning system