

Letter to the Editor

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Front-of-package nutrition labels need to be assessed on their nutrition science rigour

Madam

We read with interest the recent editorial by Kanter *et al.*⁽¹⁾ which provides a timely update on global front-of-pack (FOP) nutrition labelling activities. We note the editorial assesses the risks and benefits of FOP, but only in relation to process issues rather than their nutrition science rigour. For instance, the editorial refers to the controversial Health Star Rating (HSR) system being implemented in Australia and New Zealand, saying its benefits include that it is implemented well and contributes to food reformulation and its risks are that it is displayed on only 5% of products.

But these implementation 'benefits' and 'risks' could more accurately be described as 'risks' and 'benefits', i.e. inverted, if the nutrition science rigour underpinning the HSR is lacking. Our findings from the only comprehensive evaluation of the impact of the voluntary HSR system in the marketplace shows that this is the case. The HSR is being exploited to market discretionary (energy-dense, nutrient-poor) foods, with 57% of the HSR on these foods that have entered the marketplace since its launch displaying ≥ 2.5 (out of 5) so-called 'health' stars⁽²⁾.

Given that discretionary foods are not a part of a healthy diet and Australians need to eat less of them, we believe that encouraging the display of 3, 3.5 and 4 health stars on foods such as ice confections and chocolate-covered muesli bars misrepresents nutrition science and adds to public health nutrition confusion.

The editorial identifies FOP labelling research priorities in terms of:

- consumer behaviour and industry reformulation;
- label characteristics;
- equitable access to the information;
- nutrition labelling use in real-world settings; and
- implications of voluntary *v.* mandatory labelling.

These are important considerations, but they are a distraction until there can be confidence in the rigour of the nutrition science that underpins the design of FOP schemes. From a nutrition science perspective, the FOP labelling research priority is to better align nutrient profiling-based schemes with food-based dietary guideline recommendations informed by evidence synthesised from studies of relationships between whole foods/dietary patterns and health outcomes.

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