

Strengthening alignment between the Health Star Rating system, dietary guidance and nutrition evidence

PLAIN NUTS AS A PRIORITY CASE

An opportunity to strengthen the Health Star Rating (HSR) system

The move towards mandatory HSR through FSANZ Proposal P1067 creates an important policy window to consider whether eligible single-ingredient, plain unsalted nuts should be modelled for automatic 5-star treatment, and whether selected nut-containing reformulation scenarios warrant targeted review.



A targeted review can help ensure mandatory HSR remains trusted, evidence-informed and consistent with dietary guidance.



The core issue

The HSR system is a valuable front-of-pack labelling tool that helps consumers compare packaged foods. Like all nutrient profiling systems, it must simplify complex nutrition evidence into a practical algorithm based on selected nutrients and food components.



Since the HSR was introduced, the nutrition evidence base has increasingly highlighted the importance of whole foods, dietary patterns, food matrices, nutrient quality, bioactive compounds, and food processing. This reinforces the value of periodic review.

Why nuts are a useful case study

Plain nuts can score highly within HSR, but some do not receive the highest rating. These differences are largely driven by intrinsic energy density and saturated fat, despite plain nuts being minimally processed whole foods recommended within the Australian Dietary Guidelines. As a result, some plain nuts may appear less healthy than the broader nutrition evidence supports.

EVIDENCE SNAPSHOT:



Nut intake^{1,2}:

- ✓ is associated with lower cardiovascular disease and mortality risk
- ✓ improves cardiometabolic risk markers
- ✓ does not promote weight gain.

HSR may not fully capture the health value of nuts



HSR inputs

- Energy
- Saturated fat
- Sodium
- Sugars
- Fibre, Protein, FVNL



Broader food-level evidence

- Unsaturated fat profile
- Food matrix
- Micronutrients & bioactives
- Health outcome evidence



Potential consequences

- Some plain nuts do not receive the highest HSR
- Adding nuts may improve nutritional quality but lower HSR in some reformulated foods

Mandatory HSR should reinforce, not complicate, public health advice to eat recommended core foods such as single-ingredient, plain unsalted nuts.

RECOMMENDED ACTION:



1. Primary recommendation:

Model whether eligible single-ingredient, plain unsalted nuts should receive an automatic 5-star rating.



2. Additional technical consideration:

Test whether selected nut-containing reformulation scenarios create unintended HSR outcomes.

What should be considered?

Targeted review should examine the assumptions underpinning the current approach to plain nuts. This should consider:

- 1 Can eligible single-ingredient, plain unsalted nuts be clearly distinguished from nuts with added salt or oil through specific eligibility criteria?
- 2 Would eligibility criteria improve consistency with dietary guidance and nutrition evidence for plain nuts, while retaining consumer comparison for nuts with added salt or oil?
- 3 Do the HSR differences among eligible plain nuts, largely driven by intrinsic energy density and saturated fat content, reflect meaningful differences in health value?
- 4 Are concerns that an automatic 5-star rating could encourage overconsumption supported by evidence, given Australian nut intake remains low and nut consumption does not promote weight gain in RCTs?
- 5 Do reformulation scenarios create unintended incentives? E.g. replacing nuts with refined starches to achieve a higher HSR but reducing overall nutritional quality.

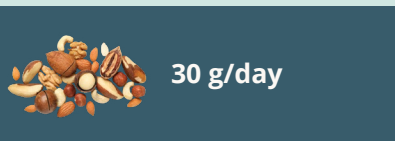
This approach is consistent with broader developments in nutrient profiling, where greater attention is being given to whole foods, processing and nutrient quality, alongside individual nutrient thresholds^{3,4}.



The intake gap

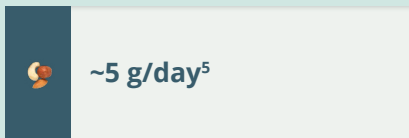
Nut intake remains very low in Australia. This gap reinforces the need for public health messaging, including front-of-pack labelling, to provide clear and consistent signals about plain nuts.

RECOMMENDED TARGET



30 g/day

AVERAGE INTAKE



~5 g/day⁵

Points to consider in HSR policy discussions

In HSR policy discussions, including responses to P1067, you may wish to:



Reinforce the principle: Mandatory HSR should reinforce dietary guidance and nutrition evidence for nuts, particularly eligible single-ingredient, plain unsalted nuts.



Recommend targeted modelling: FSANZ should model whether eligible single-ingredient, plain unsalted nuts should receive an automatic 5-star rating, and consider selected nut-containing reformulation scenarios as an additional technical issue.

References

1. Balakrishna, R., et al. *Advances in Nutrition*, 2022. 13(6):2136-48.
2. Nishi, SK., et al. *Obesity Reviews*, 2021; e13330.
3. Merz, B., et al. *Nature Food*, 2024. 5:102-10.
4. Braesco V., et al. *Nutrients*, 2025. 17:1195.
5. Nikodijevic, C., et al., *Public Health Nutrition*, 2020. 23(18):3368-78.