

SUBMISSION ON

P1067 Call for Submissions on Health Star Rating

3 July 2026

To: Food Standards Australia New Zealand

Name of Submitter: Horticulture New Zealand

Supported by: Strawberry Growers NZ, Citrus NZ, NZ
Vegetable Council.

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OVERVIEW

Submission structure

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Our submission

Horticulture New Zealand (HortNZ) thanks Food Standards Australia New Zealand for the opportunity to submit on the Call for Submissions on P1067 - Health Star Rating System and welcomes any opportunity to continue to work with FSANZ and to discuss our submission.

The details of HortNZ's submission and decisions we are seeking are set out in our submission below.

HortNZ's Role

Background to HortNZ

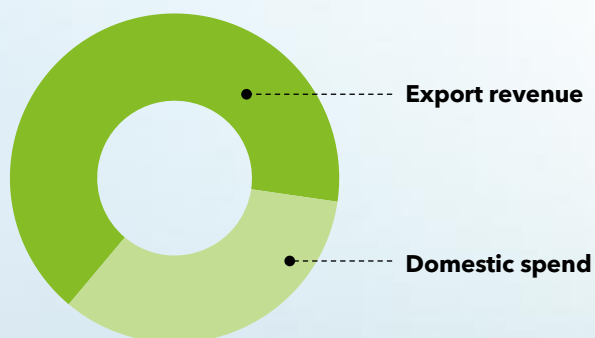
HortNZ represents the interests of approximately 4,300 commercial fruit and vegetable growers in New Zealand who grow around 100 different fruits and vegetables. The horticultural sector provides over 40,000 jobs.

There are approximately 80,000 hectares of land in New Zealand producing fruit and vegetables for domestic consumers and supplying our global trading partners with high quality food.

It is not just the direct economic benefits associated with horticultural production that are important. Horticulture production provides a platform for long term prosperity for communities, supports the growth of knowledge-intensive agri-tech and suppliers along the supply chain, and plays a key role in helping to achieve New Zealand's climate change objectives.

The horticulture sector plays an important role in food security for New Zealanders. Over 80% of vegetables grown are for the domestic market and many varieties of fruits are grown to serve the domestic market.

HortNZ's purpose is to create an enduring environment where growers prosper. This is done through enabling, promoting and advocating for growers in New Zealand.



Industry value \$7.54bn

Farmgate value \$4.89bn

Export revenue \$4.99bn

Domestic spend \$2.55bn

Source: HortNZ Annual Report 2025

Executive Summary

HortNZ supports the proposal for minimally processed fruit and vegetables to be able to use the Health Star Rating on a voluntary basis, without the requirement for a Nutrition Information Panel. HortNZ also supports the proposal of an automatic five-star rating for these products. We consider it will support the increased consumption of fruit and vegetables and healthier diets for all New Zealanders.

We support more Government funded consumer education of the Health Star Rating system, including its role in promoting New Zealand Dietary Guidelines, whether the system remains voluntary or becomes mandatory.

If the Health Star Rating becomes a mandatory labelling requirement, this will add cost and complexity to labelling requirements for some of our members that have packaged products. Therefore, there should be a reasonable transition time to allow the industry to implement it, given the current low voluntary uptake of 36% in New Zealand.

Submission

1. Discussion Questions

This submission has not addressed every question. Those relevant to Horticulture New Zealand are answered below.

Q. 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? Please provide reasons and describe any practical or implementation issues FSANZ should consider.

We support the inclusion of minimally processed fruit and vegetables on a voluntary basis

We support the formal inclusion of minimally processed fruit and vegetables being allowed to use the Health Star Rating on a voluntary basis, as it may encourage consumption of fruit and vegetables. This should include all whole fresh fruit and vegetables, as sold with no processing, plus these same products that have only been peeled, cut and/or surface treated and/or blanched and/or frozen (not dried), or canned without the addition of fat, sugars/sweeteners or salt¹, even if sold in a package.

The latest monitoring report from New Zealand (dated November 2025) shows the HSR is used on fruit and vegetables in New Zealand (on 286 products)² and if this can be increased it would be beneficial to the New Zealand population as a whole.

Any move to encourage New Zealanders to eat more fruit and vegetables is a positive one. We note the New Zealand Eating and Activity Guidelines state³: *'Enjoy plenty of vegetables and fruit: Eating vegetables and fruit can help prevent excess weight gain and obesity as most vegetables and fruit are low in energy (kilojoules) and generally high in dietary fibre compared with many other foods. Consumption of fruit and vegetables protects the body against non-communicable diseases such as heart disease and some cancers.'*

We also support the HSR being able to be displayed nearby the food on a display (as outlined in Supporting Document 5, Technical Assessment) and not necessarily on packaging, given that packaging for some fruit and vegetables is extraneous.

¹ [Health Star Rating System Implementation Guide v9.pdf](#)

² [Microsoft Word - D26-716233 Uptake of the Health Star Rating system as at Nov 2025 - final.DOCX](#)

³ Eating Statement 1.

Q. 8

Do you support FSANZ's proposed approach with respect to FVNL content used when calculating the HSR (see section 4.3.4 of this report 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.

Some of our members would be captured under a mandatory standard for packaged foods, for example potato processors. The algorithm places significant weight on sodium, saturated fat and energy, which can result in lower Health Star Ratings even though a product may be made primarily from vegetables (e.g. frozen fries, wedges). Some of our members therefore query whether the algorithm appropriately recognises the nutritional contribution of fruit and vegetables, and good sources of fibre, minerals and vitamins.

Q. 9

Do you support FSANZ's proposed approach with respect to algorithm overrides? Please provide reasons for your response, including any specific aspects of the proposed approach that you consider problematic or could be improved.

We support the algorithm override for fresh and minimally processed fruit and vegetables with a clear definition

We support fruit and vegetables being allowed to use the Health Star Rating (HSR) on a voluntary basis, with the 'algorithm override' allowing these foods to have the HSR without the Nutrition Information Panel being required on a label. We also support not having to calculate a rating and receiving an automatic five stars.

Given minimally processed fruit and vegetables is proposed to be subject to an algorithm override, to support this we ask for a clear definition of minimally processed in the standard. We note this is defined in the implementation guide⁴ and we would support a version of this being in the standard itself, and would welcome being part of any discussions to form this definition.

From our reading, this would include all loose produce, as well as items such as bagged apples and bagged single ingredient salads or leafy greens would be able allowed to use the automatic 5 stars, but not those products with the addition of extra ingredients such as dressings. However, there are other areas of ambiguity, such as frozen peas which are sold in a package, but we consider are minimally processed.

⁴ [Health Star Rating System Implementation Guide v9.pdf](#)

More support for education of the Health Star Rating system

Given the documentation indicates that many consumers do not understand the system, more resources and funding should be committed to ensure consumers understand it. This would complement and support the continued use of the system, whether voluntary or mandatory. This should strongly link to the New Zealand Dietary Guidelines.

Reasonable lead in time for mandatory requirements

If the HSR system becomes mandatory on all labelled packaged food, it would require a vast number of labelling changes due to the current estimated 36% voluntary uptake across all packaged food in New Zealand. This would include some in the horticulture sector, such as canned vegetables or fresh bagged salads with dressings and other additions. If a producer has not placed the HSR on voluntarily, it would require nutritional analysis, label redesign and packaging changes.

Given the scale of the change, we support a long lead in time for change. This would allow time for labels to be amended as part of regular label updates and reduce costs of compliance.