The low-down on Health Claims and Health Star Rating for oils and fats

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How will the upcoming health claim changes in the food regulations and the new health star ratings (HSR) impact oils and fats?

Health star ratings are progressively appearing on labels as the supermarkets label their own-brand products with it. So will your product stand out by not declaring its HSR?

Not all oils are what they seem

From the results in the table we can see that there is a wide range of choices on "healthiness" from the lowest $\frac{1}{2}$ star for salted butter up to the highest 4 $\frac{1}{2}$ stars for hazelnut and canola oils and lots of choices in between.

Food	NPSC and HSR Score	Health Star Rating	Energy (kJ per 100ml or 100g)	Saturated Fat (g)	Sodium (mg)
100 mL Oil, hazelnut	16	****	3378	6.8	0
100 mL Oil, canola	16	★★★★☆	3407	6.9	0
100 mL Oil, Almond	17	***	3404	7.5	0
100 mL Oil, Flax/Linseed	17	***	3436	7.6	0
100 mL Oil, walnut	18	***	3378	8.3	0
100 mL Oil, avocado	19	***	3226	10.1	0
100 mL Oil, safflower	20	***	3424	10.6	0
100 mL Oil, sunflower	20	***	3431	10.9	0
100 mL Oil, Olive	22	***☆	3367	12.8	0
100 mL Oil, Macadamia	23	***☆	3404	13.2	0
100 mL Oil, sesame	23	***☆	3424	13.2	0
100 mL Oil, soybean	23	***	3393	13.9	0
100 mL Corn/maize oil	25	***	3438	15.3	0
100 mL Oil, Peanut	26	***	3367	16.5	0
	Onl	y oils & fats with a sco	re below 28 can make health claim	IS	
100 mL Oil, rice bran	28	★★ ☆	3441	18.3	0
100 mL Oil, cottonseed	33	**	3438	23.8	0
100g Butter, unsalted	39	*	3106	54.1	7
100g Chicken fat	41	*	3700	30.4	0
100g Pork fat / lard	41	*	3700	40.5	0
100g Palm olein	41	*	3700	43.1	0
100g Fat, mutton tallow	41	*	3700	47.3	0
100g Fat, beef tallow	41	*	3700	49.8	0
100g Oil, cocoa butter	41	*	3700	59.7	0
100g Ghee/AMF	41	*	3700	65.0	2
100g Palm Kernel oil	41	*	3700	81.5	0
100g Coconut Fat/"oil"*	41	*	3700	84.4	0
100g Butter, salted	45	☆	3053	53.1	547

Notes:

An open star is a ½ star

Amounts entered per 100ml for oils and per 100g for fats

Data mostly from NZ Food Files, if not available in that order: AusNut and USDA data. Actual products could have different analytical and density (g/ml) results.

Oils have different density data in the databases, and this can affect the ratings up or down if energy (and saturated fat) levels fall to the other side of cut-off points of the 3 point health star ranges, so accuracy is probably $+/-\frac{1}{2}$ star.

Chicken fat and pork fat based on saturated fat level in 100% rendered fat.

*Coconut fat if worked out as a "coconut oil" as a liquid scores 40, so still only 1 star.

For these oils/fats only baseline (="penalty") points for energy, saturated fat and sodium play a part in the scoring on the Nutrient Profiling Scoring Criterion (NPSC). Baseline points for sugars and modifying (="bonus") points for protein, fibre and FVNL (fruit vege nut legume%) aren't relevant here. Oils and fats are in Category 3, so need to score less than 28 points on the NPSC to be allowed to make health claims and get at least three health stars. Surprising for most people in my recent Christchurch NZIFST FIT workshop was that rice bran oil with its healthy image actually seems to miss the cut and wouldn't be able to make health claims. The cut off points for claim permission for oils is at the >3350kJ or >18.0g/100ml saturated fat mark.

So what else is in the new standard 1.2.7 and 1.2.8 that impacts oils and fats?

- 1. No vegetable oil or fat can make a free of or low cholesterol claim anymore as they cannot comply with the requirement to have low saturated fat levels (max 0.75g/100ml liquid food or 1.5g/100g solid food). You can't even list it in the nutrition panel because a non-compulsory declaration such as cholesterol is still a claim so must comply. Why this rule if there is no cholesterol? It is saturated and trans fat that mainly impacts blood cholesterol, not dietary cholesterol.
- 2. Trans-fat can be listed at any level in the NIP without it being a claim if no further text claims are made about it on the label (See 1.2.8. clause 19). In that case it isn't necessary either to list mono- and polyunsaturated fats. This facilitates export to countries where trans-fat listing is compulsory. The only claims permitted for trans-fat are free or reduced/light. Low is not permitted. ((Standard 1.2.7 clause 11(5)).
- 3. Reduced/light claims have to state a reference food which has to be from the same food group. In this case that is "fats, including edible oils and edible oil spreads". So you can't compare oil-based spreads

with cream cheese (milk product) or peanut butter (legume product).

- 4. There are new nutrition content claim options around levels and "low proportion" of saturated and /or trans fatty acids. "Low proportion" may be hard for consumers to comprehend and therefore I suspect of limited marketing appeal.
- 5. Health claims are pre-approved for phytosterols, low saturated/trans fats, fat soluble vitamins, choline and DHA/EPA (heart only, not brain). To be able to make these claims, products need to pass the NPSC and comply with the nutrition content rules.

Continuing from the previous 1.2.8 standard or the Code of Practice are requirements around low/reduced fat/% fat free, mono-unsaturated fats, poly-unsaturated fats, omega-3, 6 and 9. The omega requirements are often not met, in particular for the nutrition content claim of a "3/6/9 balanced" oil. Both Omega-6 and Omega-9 need to be at least 40% of fatty acids to comply with that. Check out Standard 1.2.7 on the FSANZ website for the finer detail.

Will you be ready in January 2016?

The new health claims standards 1.2.7 and 1.2.8 come fully into force in January 2016 with no further stock-in-trade provisions, so by then all labels as sold need to be fully compliant.

Nutrient Profiling Scores can be calculated on line: http://www.foodstandards.gov.au/industry/labelling/pages/nutrientprofilingcalculator/Default.aspx

Health star ratings can be calculated online, which then also provides the "vector" artwork for the label designer or use the latest version of the downloadable spreadsheet. http://www.healthstarrating.gov.au/internet/healthstarrating/publishing.nsf/Content/calculator.



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