



To: Food and Drug Administration  
From: Guiding Stars Licensing Company  
Date: June 18, 2014  
Re: [Docket No. FDA-2012-N-1210] - Food Labeling: Revision of the Nutrition and Supplement Facts Labels

On behalf of the Guiding Stars Licensing Company and its Scientific Advisory Panel, we respectfully submit the following background summary of the Guiding Stars program, as well as comments specific to Docket No. FDA-2012-N-1210 issued on March 3, 2014. The Scientific Advisory Panel of Guiding Stars strongly supports the FDA's proposed revisions to the Nutrition and Supplement Facts Labels. Furthermore, the scientists at Guiding Stars concur that the current nutrition and supplement facts labels are outdated and very much in need of change in order to reflect current scientific evidence and consensus public health nutrition policy.

#### *Background Summary of the Guiding Stars program*

#### **Guiding Stars Patented Nutrition Guidance System**

The patented (No.7,974,881) Guiding Stars® program is the world's first storewide nutrition guidance system. Developed by a Scientific Advisory Panel of experts in the fields of nutrition science, food science and public health, Guiding Stars is a simple tool that highlights foods with higher nutrient density, allowing consumers to quickly identify and choose foods that offer the most nutrition for the calories. Guiding Stars utilizes an evidence-based algorithm that is grounded in the most current science and recommendations of leading national and international health organizations, such as the US Food and Drug Administration, the US Department of Agriculture, the US Department of Health & Human Services, the National Academy of Sciences, and the World Health Organization and is consistent with recommendations from the 2010 Dietary Guidelines for Americans. The algorithm analyzes nutrient data obtained from the Nutrition Facts label found on food labels and the USDA's National Nutrient Database. For added sugars, as this information is not found either on the Nutrition Facts label or in the USDA database, but is felt to be significant in evaluating the nutritional quality of foods, a proxy measurement based on available data is used. Guiding Stars rates a product's nutritional quality per 100 calories, which allows for consistent measurement regardless of package and serving size variations, and evaluates all foods in a grocery store or food service environment, including packaged, fresh and prepared foods. Over 100,000 foods have been rated and are now in the Guiding Stars nutrition database. The only exceptions are foods containing less than 5 calories per serving, such as water, coffee, tea and spices. Products earning 1, 2 or 3 stars in the Guiding Stars system contain *more* vitamins, minerals, fiber and whole grains and *less* saturated fat, *trans* fat, cholesterol, added sodium and added sugars. Guiding Stars takes the guesswork out of shopping for nutritious food by eliminating the need to compare every item in the store, saving the consumer time and responding to the consumer imperative for convenience and simplicity. Guiding Stars is an objective program and is not influenced by price, brand or manufacturers. Guiding Stars is currently found in almost 1,900 supermarkets in the U.S. and Canada, including Hannaford, Food Lion, Homeland, Marsh Supermarkets, B&R and Price Chopper in the U.S., and including more than 350 Loblaw, Provigo and Provigo Le Marche stores in Quebec and Ontario. Guiding Stars has also expanded into public schools, colleges and hospitals and appears on the Shopper mobile iPhone application and online through the Guiding Stars Food Finder.



## Research

An article that explains and outlines the development of the Guiding Stars algorithm was published in 2011 in the American Journal of Health Promotion titled *Development and Implementation of the Guiding Stars Nutrition Guidance Program*.<sup>1</sup>

A presentation at the American Dietetic Association 2010 Food & Nutrition Conference & Expo, *Impact of a Nutrient Density Rating System on Cafeteria Food Choices among High School Students*, described the effect of marking individual convenience “grab-n-go” items offered for sale in a high school cafeteria that met rating criteria with 1, 2, or 3 stars on shelf tags. Researchers collected data on food and beverage selections made by students during meal times at baseline and post implementation of Guiding Stars. Results indicated that students choose significantly more food and beverage items with stars versus non-starred items after implementation than at baseline during the breakfast meal.

Research published in the *American Journal of Clinical Nutrition* in 2010 shows Guiding Stars had a positive influence on food purchasing decisions after the implementation of the zero-to-three star rating system, and that the changes continued to be significant in making healthier food choices in the supermarket.<sup>2</sup> Additionally, research found that the percentage of items purchased that had at least one star rose over a two year time period.

More recently, an independent research study conducted by scientists at the USDA, FDA and the University of Florida and published in the journal *Food Policy* in 2013 found that shoppers were significantly more likely to choose ready-to-eat cereals with one, two or three Guiding Stars, indicating a higher nutritional value, versus those with zero stars, or a lower nutritional value.<sup>3</sup> As a result, the market shares of cereals earning Guiding Stars increased, while those without stars declined in relative proportion. This research was undertaken in response to the Institute of Medicine’s 2012 report on front of pack nutrition labeling systems, and showed that the presence of point of sales guidance may help consumers select products that are more nutritious in terms of the Guiding Stars rating. Moreover, a follow-up independent study conducted by the same team and published in the *International Food and Agribusiness Management (IFAMA) Review*<sup>4</sup>, found that hypothetical nationwide implementation of the Guiding Stars Program (GSP) on ready-to-eat breakfast cereals alone could prompt consumers to reduce the amount of added sugars and increase the amount of whole grains in their diets by 2.5 percent, while also reducing calories and sodium intake. The results also confirm that the Guiding Stars rating system aids in decision-making for consumers who cannot read or have a hard time understanding the Nutrition Facts label.

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<sup>1</sup>Fischer LM, Sutherland LA, Kaley LA, Fox TA, Hasler CM, Nobel J, Kantor MA, Blumberg J. Development and implementation of the Guiding Stars nutrition guidance program. *Am J Health Promot*, 2011 Nov;26(2):e55-63.

<sup>2</sup>Sutherland, LA, Kaley, LA, Fischer, LM. Guiding Stars: The Effect of a Nutrition Navigation Program on Consumer Purchases at the Supermarket. *American Journal of Clinical Nutrition*, 2010; 91(4):1090S-1094S.

<sup>3</sup>Rahkovskya, I, Lin, B-H, Jordan Lin, C-T, Lee, J-Y. Effects of the Guiding Stars Program on purchases of ready-to-eat cereals with different nutritional attributes. *Food Policy*, 2013 (43):100–107.

<sup>4</sup>Lin, B-H, Guthrie, J, Rahkovskyc, I, Lind, C-T, Lee, J-Y. Simulating the Potential Effects of a Shelf-Tag Nutrition Information Program and Pricing on Diet Quality Associated with Ready-to-Eat Cereals. *International Food and Agribusiness Management Review*, 2014 (17): Special Issue A.



*Comments on the FDA's Proposed Revision of the Nutrition and Supplement Facts Labels [FDA-2012-N-1210]*

The scientists and team at Guiding Stars are deeply committed to helping consumers make informed and improved food choices to positively impact their health. As the field of nutrition is constantly evolving, Guiding Stars is a dynamic system that is regularly revised to reflect current scientific evidence and nutrition policy. Likewise, we believe that the Nutrition Facts label should also have plasticity in order to remain as relevant as possible. The Nutrition Facts label has not been truly revised for approximately two decades and what we know about the relationship between diet and health promotion/disease prevention has progressed significantly during that time period. Moreover, the eating patterns of Americans and primary health concerns have also changed. We have also advanced our knowledge of consumers' perception and understanding of information presented on food labels, and have a better grasp of how to make this information as useful as possible. In order to best help consumers and cause less confusion, the food label should reflect the most current evidence available in these converging fields. Thus we at Guiding Stars fully agree with and support the FDA's proposed revisions to the Nutrition Facts label.

We concur that emphasis should be placed on total calories (rather than calories from fat), and that this information should be highly visible and readily accessible. We also applaud the FDA's proposal to list added sugars separately on the Nutrition Facts label. Currently, the ingredient list must be inspected for sweeteners in order to determine if a product contains added sugars or not. Furthermore, new sweeteners regularly appear in the food supply and most consumers are not familiar with the myriad of sugar synonyms that are used in processed foods. In the Guiding Stars database to date, 46 caloric sweeteners have been identified in labeled food products and this list continues to grow. As recent evidence and nutrition policy has underscored the need to increase consumer focus on added sugars found in foods, we believe that listing this separately on the Nutrition Facts label would be very beneficial to consumers.

Not only will the proposed changes to the Nutrition Facts label help consumers better understand the associated food and thus make more informed decisions, they will also more accurately inform nutrient profiling tools such as Guiding Stars which are based on this information and can provide an additional level of information to help the consumer. We fully support efforts to revamp the information provided on the Nutrition Facts label, as timely updates to the label are highly relevant to the challenges presented by our most pressing public health problems. We recommend that this be an ongoing process, and that in future iterations inclusion of omega-3 fatty acids as an optional nutrient (as is done in Canada) also be considered, as this is another ingredient of interest to consumers, and one for which a developing body of scientific evidence supports human health benefits.

In conclusion, we respectfully recommend that the FDA finalize its proposed revisions to the nutrition and supplement facts labels. Thank you for the opportunity to provide comments on this important issue.

Respectfully submitted,

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Nutritious choices made simple™

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