



To: Food and Drug Administration

From: Guiding Stars Licensing Company

Date: July 31, 2014

Re: [Docket FDA-2004-N-0258] – Serving Sizes of Foods that can Reasonably be Consumed at One Eating Occasion; Dual-Column Labeling; Updating, Modifying, and Establishing Certain Reference Amounts Customarily Consumed; Serving Size for Breath Mints; and Technical Amendments

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-2004-N-0258 issued on March 3, 2014. The scientific advisory panel of Guiding Stars strongly supports the FDA's proposed revisions regarding serving sizes used on the Nutrition Facts label. Furthermore, the scientists at Guiding Stars concur that the currently used serving sizes are very much in need of updating in order to reflect current eating patterns of Americans and thus make the information presented more meaningful.

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*.¹



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.² 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.³ 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*⁴, 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.

Comments on Docket [FDA-2004-N-0258]

Serving Sizes of Foods that can Reasonably be Consumed at One Eating Occasion; Dual-Column Labeling; Updating, Modifying, and Establishing Certain Reference Amounts Customarily Consumed

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. The eating patterns of Americans, including average portion sizes, have changed significantly in the past two decades. Moreover, what we know about the relationship between diet and health promotion/disease prevention has progressed significantly during that time period. Finally, given that the body of knowledge about consumers’ understanding and perception of information

¹Fischer 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.

²Sutherland, 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.

³Rahkovskya, 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.

⁴Lin, B-H, Guthrieb, 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.



presented on food labels has also grown, now is the time to apply this knowledge to an update of the Nutrition Facts Label. A food label that synthesizes all of these factors and reflects the most current evidence available will provide consumers with a truly helpful tool to aid in food purchasing decisions. Given that portion control is of vital importance in public health education relating to weight control and diabetes, for example, it follows that special emphasis should be placed on accurately and clearly communicating serving sizes on product labeling. Thus we at Guiding Stars fully agree with and fully support the FDA's proposed revisions, amendments and updates to the Nutrition Facts label and Reference Amounts Customarily Consumed (RACCs).

We applaud the FDA's proposal to provide a thorough update to serving size information and RACCs. In the Guiding Stars database, we have encountered numerous scenarios where an identical product's serving size varied depending on the package size. Breakfast cereals, beverages, and snack items, for example, are areas where this type of inconsistency occurs and likely leads to consumer confusion. The Guiding Stars algorithm circumvents this issue by standardizing serving sizes to 100 calories so that all identical products receive the same rating regardless of package size. Other nutrient profiling systems (aimed at assisting consumers with food choices) have also utilized a standard serving size. Aside from these inconsistencies, we concur that an examination and revision of currently used RACCs is needed as the current RACCs are not representative of the portion sizes that Americans are actually eating based on consumption data. In general, they underrepresent commonly consumed serving sizes. Thus, the information presented on the label, including total calories, may also be underrepresented. This in turn can give consumers a false sense of how much food they are eating, and the caloric and nutrient content of that food, which could further contribute to overconsumption.

Not only will the proposed changes to the serving sizes help consumers better understand the associated food and thus make more informed decisions, but they will also more accurately inform and align with 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. Efforts to revamp this information are timely and relevant to the challenge presented by our most pressing public health problems.

In conclusion, we respectfully recommend that the FDA finalize its proposed revisions to the serving sizes used on the Nutrition Facts label. Thank you for the opportunity to provide comments on this important issue.

Respectfully submitted,

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