Guiding Stars®
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To: Federal Trade Commission
From: Guiding Stars Licensing Company
Date: June 13, 2011
Re: Interagency Working Group on Food Marketed to Children: Proposed Nutrition Principles: FTC Project No. P094513

On behalf of Guiding Stars Licensing Company and its Scientific Advisory Panel, we respectfully submit the following background summary of the Guiding Stars program, as well as our comments on the Proposed Nutrition Principles: FTC Project No. P094513.

Background Summary of the Guiding Stars program

Guiding Stars Nutrition Guidance System

Guiding Stars® 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 2005 Dietary Guidelines for Americans. The Scientific Advisory Panel members are currently reviewing the 2010 Dietary Guidelines for Americans to ascertain potential updates to the Guiding Stars system. The algorithm analyzes nutrient data obtained from the Nutrition Facts label found on food labels and the USDA's National Nutrient Database and rates a product's nutrient density per 100 calories, which allows for consistent product evaluation regardless of package and serving size variations. Guiding Stars rates all foods in a grocery store or food service environment, including packaged, fresh and prepared foods. Over 80,000 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 nutritious shopping 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 implemented in over 1,600 supermarkets in 19 states. The program has also been implemented in the dining halls and convenience stores of three colleges, several public school cafeterias, and in hospital cafeterias and patient food services.

Recent Research

A manuscript that outlines the development of and explains the Guiding Stars algorithm has been accepted for publication by the American Journal of Health Promotion titled *Development and Implementation of the Guiding Stars Nutrition Guidance Program.* It is anticipated that it will be published before the end of 2011.

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A poster was presented at the American Dietetic Association 2010 Food & Nutrition Conference & Expo on November 9th entitled *Impact of a Nutrient Density Rating System on Cafeteria Food Choices Among High School Students*. In this study individual convenience grab-n-go items offered for sale in a high school cafeteria that met rating criteria were marked 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 by 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 the changes continue to be significant in making healthier food choices in the supermarket.[1] Additionally, research found that the percentage of items purchased that had at least one star increased significantly from 9.54 to 10.37% over a two year time period.

Comments on the Proposed Nutrition Principles: FTC Project No. P094513

We applaud the FTC for the efforts of the Interagency Working Group on Food Marketed to Children that included representatives from the FTC, CDC, FDA, and USDA in the development of the preliminary proposal for voluntary principles to guide industry self-regulatory efforts to improve the nutritional profile of foods marketed to children. We believe that the Guiding Stars nutrition guidance system addresses several critical issues raised in the request for comments document:

(1) Meaningful contribution to a healthful diet could readily be assessed utilizing nutrient density. Guiding Stars assesses nutrient density per 100 kcal by the inclusion of the positive dietary attributes (nutrients to encourage) of vitamins, minerals, fiber and whole grain and of the negative dietary attributes (minimize consumption) of *trans* fat, saturated fat, cholesterol, added sugars and added sodium. Inclusion of these attributes and the concept of nutrient density are aligned with the Dietary Guidelines for Americans.

(2) Guiding Stars utilizes a standard serving size of 100 kcal to best convey nutrient density. This eliminates the need to address multiple RACC sizes. Also, normalization to a 100 kcal serving size adjusts serving sizes up or down inversely to energy density, can be applied to beverages and liquid items which are supplied in volume, adjusts for water content of foods, and allows for side-by-side comparison of similar products.

(3) In the Guiding Stars system nutrient targets are based upon percentages of Daily Values (DV) that appear on the food label. From these, nutrient targets could easily be selected for *trans* fat, saturated fat, added sugars and sodium for the purpose of setting limits regarding foods marketed to children.

(4) One set of nutrition principles could be used for both young children and youth since the Dietary Guidelines for Americans apply to the US population age two and above.

Thank you for the opportunity to provide comments on these important and historic proposed nutrition principles to guide industry self-regulatory efforts regarding food marketed to children.

[1]Sutherland, LA, L.A. Kaley, L Fischer, "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.

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Respectfully submitted,

Guiding Stars Licensing Company

Betts FitzGerald	Managing Director
John Eldredge	Director of Brand & Business Development
James McBride	Director of Operations

Guiding Stars Licensing Company Scientific Advisors

Leslie Fischer, PhD, MPH, RD	University of North Carolina
Lori Kaley, MS, RD, LD, MSB	University of Southern Maine Muskie School
Jeremy Nobel, MD, MPH, MS	Harvard School of Public Health
Jeffrey Blumberg, PhD, FACN, FASN	Tufts University
Clare Hasler-Lewis, PhD, MS, MBA	Robert Mondavi Institute for Wine and Food Science, University of California, Davis