April 16, 2015

Dear Secretary Vilsack and Secretary Burwell:

On behalf of the Guiding Stars Licensing Company and its Scientific Advisory Panel, we respectfully submit comments specific to the Scientific Report of the 2015 Dietary Guidelines Advisory Committee (DGAC) as well as a brief background on the Guiding Stars program. We applaud the steps taken by the Dietary Guidelines Advisory Committee to translate current nutrition science into policy. In particular, we support the DGAC's emphasis on eating a diet rich in whole and minimally processed foods, including vegetables, fruits, whole grains, legumes, and nuts. We also agree strongly with the recommendation to remove the restriction on dietary cholesterol intake for the general population given the lack of sufficient evidence linking this ingredient to heart disease risk. Moreover, we concur that more focus should be placed on reducing the intake of added sugars and agree that revised, more restrictive and defined intake guidelines for added sugars and processed carbohydrates are warranted. As advocates for consumer-directed efforts that encourage positive behavior change regarding food choices, we fully support the DGAC's recommendation to implement long overdue changes to the Nutrition Facts label and consider a national, standardized front-of-package labeling program on all foods and beverages similar to the Institute of Medicine's recommendation for a simple 0 to 3 points program such as Guiding Stars. Indeed, the Guiding Stars program is and will continue to be aligned with the Dietary Guidelines for Americans. Ours is a scientifically studied and validated approach to nutrition profiling that has been recognized by the Institute of Medicine and commended by former Surgeon General, Dr. Steven Galson. Finally, we strongly believe that emphasis on sustained consumer outreach and education is critical to achieving the long term goals of improved health for Americans. Significant changes must be made to the food environment, including improvements in the retail food environment, to increase access of healthy foods to more individuals and promote improved public health through better adherence to the 2015 Dietary Guidelines.

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. 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 more than 1,500 supermarkets in the U.S., including Hannaford, Food Lion, Homeland, Marsh Supermarkets, B&R and Price Chopper (Kansas City) and in more than 900 stores across Canada through Loblaws and its affiliated banner stores. 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. A manuscript 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]

Guiding Stars and its scientific advisors 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. In conclusion, we respectfully recommend that the U.S. Department of Health and Human Services and the U.S. Department of Agriculture adopt the DGAC's recommendations as noted above and take appropriate steps to move forward the Institute of Medicine's work to define a front-of-package labeling program. Thank you for the opportunity to provide comments on these advances to dietary guidelines for Americans.

Respectfully submitted,

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[1]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.