



## GUIDING STARS

### Nutrition-Related FAQs - For Dietitian Training

#### About Guiding Stars

##### 1. Tell me about Guiding Stars.

Guiding Stars is an objective, evidence-based, nutrition navigation program, providing at-a-glance nutritional ratings for foods found in every store aisle – it takes the guesswork out of making healthier choices. Guiding Stars rates foods based on their nutritional quality and assigns each food a rating of up to three stars; the more stars, the better.

##### 2. What if a product or shelf tag has no stars?

If the product or shelf tag has no stars, it simply means one of the following:

- 1) The food item does not meet the nutritional criteria for a Guiding Star
- 2) The food item has five calories or less per serving (products like bottled waters, dried spices, and coffees/teas are not rated by Guiding Stars because they contain so few calories)
- 3) The food item has not yet been rated

##### 3. What are some examples of starred products?

Every food group has a unique combination of attributes so it is difficult to compare foods from different categories however as you go through each aisle of the grocery store, Guiding Stars can help identify more nutritious options within similar products in each section of the store. For example, items in the following departments typically earn stars because of these attributes specific to their category:

- Cereals: **less** added sugars, **more** whole grains, and dietary fiber.
- Meats, Seafood, Poultry and Dairy: **less** saturated fat, *trans* fatty acids, cholesterol, added sugars and added sodium.
- Soups: **less** added sodium and **more** dietary fiber earn Stars.
- Breads: **less** added sugars and sodium, and **more** whole grains, dietary fiber and vitamins/minerals.

##### 4. What criteria are considered for assigning stars to individual foods?

The Guiding Stars program assigns values for a variety of nutrients found on the Nutrition Facts table and ingredient list. For foods that are not labelled, like meat, fruits, seafood, and vegetables, the program uses information from USDA's National Nutrient Database (SR-25). Foods can acquire stars for containing more vitamins and minerals, dietary fiber, whole grains and omega-3 fatty acids. DHA and EPA, and are debited for containing *trans* fatty acids, saturated fat, cholesterol, added sugars, added sodium, and artificial colors.

##### 5. How does Guiding Stars ensure that the data and star ratings are accurate?



The Guiding Stars team captures and processes all product data required to complete the rating process. The data is verified through a multi-level quality control process and product photographs are maintained to support research on all ratings. As with any very large database, mistakes are possible. Guiding Stars is committed to correcting any errors as quickly as possible and sending corrected Star ratings back to the stores within 1 to 2 weeks. Additionally, manufacturers are constantly revising formulations and product packaging. Guiding Stars maintains a robust update/audit program to ensure the data is current and any changes to the Star ratings are sent back to the stores on a weekly basis.

#### **6. What percentages of foods in the store get Stars?**

Approximately 36 percent of the analyzed U.S. food products have one or more Stars. The percentages by store section are as follows:

- 100 percent of fresh fruits and vegetables
- 73 percent of seafood
- 64 percent of cereals
- 50 percent of milks and juices
- 37 percent of canned goods
- 34 percent of meat
- 34 percent of breads and baked goods
- 22 percent of yogurts
- 14 percent of soups

#### **7. Do three starred products cost more?**

Guiding Stars is an independent assessment of nutritional value. Guiding Stars is not influenced by price, brand or manufacturer trade groups and star rating does not influence pricing.

#### **8. What if a consumer has questions regarding a product's rating?**

We encourage consumers to speak with an in-store dietitian. A registered dietitian is a regulated health professional who can help make sense of food and nutrition. If the dietitian isn't available, consumers can also visit [www.guidingstars.com](http://www.guidingstars.com) to learn more about the program and product ratings. Specific questions may be addressed to the Guiding Stars team through the form on the website or by an email to [info@guidingstars.com](mailto:info@guidingstars.com).

### **Food / Nutrition-Specific Questions on Guiding Stars**

#### **9. Why are there so few stars in the HMR (Home Meal Replacement) and the Deli sections of the store?**

Guiding Stars is based on a system of credits and debits. The deli and prepared foods categories typically have a higher added sodium and / or added sugar content, which results in fewer of these products receiving Stars.



#### **10. Why isn't Baby Formula rated?**

Major medical authorities in the United States heavily regulate this group of products resulting in uniformity across brands. Also we recognize that leading pediatric authorities recommend breast feeding for the first six months of a child's life and beyond if mother and child are agreeable. We do not want our rating system to cause confusion.

#### **11. I've noticed that some diet or low-fat products have a lower star rating than the "regular" versions of the same product. How can that be?**

Although the algorithm debits for saturated fat and *trans* fatty acids, it does not debit for total fat. This can explain why some full fat products still receive stars, because although the fat is high, it is mainly unsaturated fat. In some cases, a product's low-fat counterpart may receive fewer stars due to the addition of sugar or salt which are often added for flavor in low fat products.

#### **12. Why do so few yogurts earn stars?**

While some yogurts can be healthful choices, many yogurts are very high in added sugars and include artificial colors. The Guiding Stars uses the most recent scientific consensus to inform its algorithm and therefore debits are given to foods with excessive added sugar and foods that contain artificial colors as these attributes should be limited for health.

#### **13. How is it possible for frozen fruits and vegetables to receive just as many stars as fresh?**

In most cases, frozen produce is frozen immediately after harvesting (which preserves the nutrients) and is just as nutritious as its fresh counterpart. Starred frozen fruits and vegetables are identical to the fresh varieties and have little or no added sugars, added sodium, artificial colors, saturated or *trans* fatty acids.

#### **14. In terms of stars, why aren't there differences between organic and non-organic foods?**

The GS algorithm includes only nutrients that have been researched to the extent that a scientific consensus has been reached and the knowledge has been translated into dietary guidelines/nutrition policy at either the national or international level. At the current time, there is insufficient evidence to support an influence of organic production on the nutritional quality of foods.

#### **15. Why doesn't the system debit for genetically modified foods?**

The Guiding Stars program is based on nutritional quality and there is currently insufficient evidence to support any nutrient differences between non genetically modified (GM) or GM foods. Additionally, FDA does not permit nor require the labeling of GM-derived ingredients. Thus an assessment as to their 'star' value cannot be made.



**16. Why are dietary components with publicized health benefits like antioxidants and other phytochemicals not included in the Guiding Stars scoring criteria?**

Phytochemicals such as antioxidants are not included because there are no standard dietary recommendations or requirements for these attributes. In addition, the amounts of such nutrients are not listed on food labels and are not available for most packaged foods. If phytochemicals become a regular part of labelling practices and/or regulatory bodies make standardized recommendations, the Guiding Stars program will be updated to include them.

**17. When rating fish and seafood, does the algorithm take the sourcing method (farmed vs. fresh) or mercury content into account?**

As no consensus or dietary recommendations are made on the health benefits of farmed vs. fresh it cannot be considered for the algorithm. At the current time, there is insufficient evidence to support an influence of fresh vs farmed or mercury content of fish on the nutritional value of the product. Additionally, USDA does not require the labeling of fresh vs. farmed or the mercury content of fish, thus an assessment as to their 'star' value cannot be made.

**18. What are some typical medical foods not rated by GS program?**

Foods regulated by the FDA as "Medical Foods" have different compositional requirements compared to foods rated by the Guiding Stars program. Labeling requirements for medical foods also differ according to how the medical food is sold or advertised. The Guiding Stars program does not include those products that are geared towards the treatment of a pre-existing condition, products consumed as part of energy-restricted diets (i.e. meal-replacement shakes) or products that may be consumed upon the advice of a physician.

**19. How does Guiding Stars take into account vitamins and minerals that are not included as part of the Nutrition Facts label?**

The Guiding Stars ratings are based on the same nutrient information that is available to consumers on the food label. A manufacturer may opt to only list the mandatory nutrients (Vitamin D, Calcium, Iron, Potassium), or may list all optional vitamins and minerals for which the food item is a significant source. Consequently, there are some unavoidable inconsistencies in the ratings. This approach is used in order to provide upmost transparency to the consumer by analyzing only the information that is available to them on the product. When similar products with different information are compared, the ones with less information may receive a lower rating. For products without a food label (i.e., fresh produce), complete nutrition data is obtained from the USDA standard reference database, and thus full information for the vitamin and mineral content of those foods is considered.

**20. Some vegetable oil based butter spreads such as margarines get more stars than butter but isn't butter more natural? Does Guiding Stars look at ingredient quality?**

Guiding Stars looks at the nutritional quality of foods and beverages. The term 'natural' has no clear definition to date. Regarding butter and margarine, butter contains more



saturated fat which is a nutrient that has been associated with cardiovascular disease. The Guiding Stars algorithm takes the nutrient value of ingredients into account by crediting nutrients that should be encouraged in the diet and debiting attributes that should be limited such as saturated fats, *trans* fatty acids, added sodium, added sugars, and artificial colors. A product will receive stars if the credited nutrients outweigh the debited nutrients. Some margarines are made with good fats that are lower in saturated fat and higher in things such as omega-3 fatty acids and hence may earn more stars than butter.

**21. Artificially sweetened foods are not debited. Why?**

All of the artificial sweeteners found in our food supply have undergone an extensive testing and review process and have been deemed safe by the FDA. There is insufficient scientific evidence to show that non-caloric sweeteners found in food products have negative effects on health.

**22. Why do you separate credits for omega-3 fatty acids and EPA & DHA?**

Foods with omega-3 fats are credited as they have many health benefits. Omega-3 fats include the polyunsaturated fats alpha-linoleic acid (ALA) and EPA and DHA. Current dietary recommendations for omega-3 fatty acids in the U.S. are based on ALA. However, since there

are also unique health benefits documented for EPA and DHA, an additional bonus point is provided for their presence in foods.

**23. The FDA and USDA announced new recommended daily intake (RDI) references for many vitamins, mineral and nutrients. Does the Guiding Stars program reflect the revised RDI and proposed Nutrition Facts label requirements?**

In anticipation of the updated Nutrition Facts label, and the announced updated RDI references, Guiding Stars worked diligently to update the algorithm and database to capture and best rate on this new information. While the implementation date for the Nutrition Facts label has been postponed, we are prepared to process any products that implement the new label and we have updated our algorithm to reflect the new RDI for fiber, added sodium, added sugar, and vitamins/minerals according to the new reference points offered by the FDA and USDA.

**24. By only using the ingredients list and Nutrition Facts label, how are you able to differentiate between naturally occurring and added sugars?**

Food labels currently are not required to distinguish between naturally occurring and added sugars, therefore the Guiding Stars algorithm cannot differentiate these constituents. However, the sugar content of products is only evaluated and debited IF sugars have been added to the product. To find this out, the ingredient list of each product is scanned for a list of added sugars keywords. The presence of one or more of these keywords triggers the added sugars debit.

Hence we know that all foods that receive this debit have at least some added sugar,



but in fact it is the total amount of sugars (naturally occurring and added) that is evaluated. We also know that for most food products containing added sugars, those added sugars represent the majority (if not all) of the total sugars. A few exceptions to this are sweetened dairy products, canned fruits and dried fruits. This aspect of the algorithm has been an area of focus and we are continuously striving to increase the accuracy of the added sugars debit. FDA has made a requirement for all products to declare added sugars separately from total sugars with a compliance date of January 2020. In anticipation of the FDA requirement some products do declare added sugars separately on the Nutrition Facts label and for those products we look just at the "added sugars" and not total sugars. As more products declare added sugars separately in the Nutrition Facts label we will update these products' star ratings with the new label's information.

**25. If a manufacturer were to provide the amount of added sugars in their product, could the GS algorithm include that information in its assessment?**

In anticipation of the FDA's updated Nutrition Facts label requirement, originally proposed for implementation in 2018, Guiding Stars updated their data systems to allow products that declare added sugars separately from total sugars to be entered including this additional information.

While the deadline for compliance for the Nutrition Facts label changes was extended to January 2020 we will continue to update products using the new label and debit these items only on 'added sugars'. For those products that have not updated their labels to declare added sugars separately we will continue to use our current system for rating (search for keywords indicating added sugars are present and for those products with added sugars we will continue to debit these products on 'total sugars' declared) until we receive updated product information.

**26. What about foods that contain a combination of naturally occurring and added sodium?**

Foods with only naturally occurring sodium (i.e. fresh spinach) are not debited for sodium content. However, as is the case with added sugars, for foods with added sodium that is not declared separately on the nutrition facts label is debited on 'total sodium' declared. In general for such foods the added sodium constitutes the majority of the total sodium. Keyword searches similar to those for added sugars are utilized to ensure items with added sodium are appropriately identified and debited. Some of these keywords the system looks for in the ingredients list include "salt", "sodium chloride" or "sodium citrate".

**27. Will all fresh and canned salmon products get 3-stars?**

Yes for fresh salmon but not necessarily for canned salmon. The star rating for a canned salmon product would depend on the composition and labelling of the individual product. For example, if the product contains added sodium it is subject to a debit. If the canned salmon product has only one ingredient (and water is OK), then its assessment will occur through use of the USDA standard reference database in which case it would earn 3 stars. However it is common for canned salmon to contain other





ingredients such as sodium.

**28. Do all foods that list 'hydrogenated vegetable oil' get a debit for *trans* fatty acids?**

Although manufacturers are allowed to round a *trans* fatty acids content of less than 0.5 g per serving size to zero on the nutrition facts label, any foods that list 'partially hydrogenated' in the ingredients are debited by 1 point, regardless of the *trans* fatty acids value showing on the Nutrition Facts label.

**28. If a food product does not have a Star, is it a bad food?**

Guiding Stars does not rank foods as "good" or "bad." Simply stated, foods with Stars deliver more nutrients per calorie, meaning they deliver "more bang for the buck." Eating more nutrient- dense food is important for almost everyone, especially for individuals limiting calories to control weight. If the product or shelf tag has no stars, it simply means one of the following:

- 1) The food item does not meet the nutritional criteria for a Guiding Star
- 2) The food item has less than five calories per serving (products like bottled waters, dried spices, and coffees/teas are not rated by Guiding Stars because they contain so few calories)
- 3) The food item has not yet been rated

**29. Does buying only Starred foods guarantee a healthy diet?**

Buying and eating nutrient-dense foods is a good start. However, other factors including portion size, food preparation techniques, variety, balance, fitness, weight and health status, and other factors, all help to define an individual's healthy diet.

**30. Why are baby foods rated differently than the other foods in the store?**

The Guiding Stars model for babies and toddlers reflects the specific nutritional requirements of children under the age of two. These foods receive credits for vitamins and minerals, and debits for added sodium and added sugars.

**31. Adult foods are debited if they have saturated fat, why not baby foods?**

There are no recommended daily fat intakes for children from birth to age two. Children in this age group are in a period of rapid growth and development that is characterized by high nutritional requirements, including fat and cholesterol requirements to support optimal development of their nervous system.

**32. Are there infant and toddler products that you did not rate?**

Yes. Products that are manufactured for medicinal, or supplemental uses, or products that specify that they are to be used under the supervision of a physician are not rated. Products in this category include: Pedialyte, and Bright Beginnings. Infant formulas also are not included.

**33. In the dairy section, whole milk does not earn stars, but aren't young children supposed to drink whole milk?**



Milk is rated using recommendations for children over the age of two and adults. For children under the age of two, the American Academy of Pediatrics recommends that breastfeeding continue to the age of 12 months, and thereafter as long as mutually desired. Babies need fat in their diets for a variety of reasons, including neurological development. Toddlers should drink whole milk from ages 1 to 2 years; then, if their growth is steady, you can switch to low-fat or skim milk.

**34. Why don't you credit baby foods with fiber?**

There is no recommended daily intake of dietary fiber for babies 6 to 12 months of age. Until the age of 2 years fiber is not a nutrient of emphasis. The Dietary Guidelines which recommend fiber rich foods are specifically for individuals older than 2 years of age.

**35. Water is not rated, why not? Shouldn't Guiding Stars encourage people to drink more water?**

Water is indeed important. It is simply not rated because it's not a source of calories or nutrients.

**36. I was surprised to find that some potato chips receive Stars. How could that be possible?**

We rate all foods in the grocery store and we have found that there are some choices in our "salty snacks" product line-up that do meet the criteria to earn 'stars'. You will find these items are lower in added sodium, saturated and *trans* fatty acids and are higher in vitamins and minerals.

Many manufacturers have altered their recipes to use healthier oils or other ingredients and limit sodium thereby making their product a more nutritious choice. The presence of a 'star' on an item does not indicate this should be an everyday food instead offers customers an at-a-glance tool to notify customers of a more nutritious item in the food category. Guiding Stars encourages shoppers to read Nutrition Facts labels and ingredient lists to determine the best choices for themselves and their families.

**37. Why did you include "whole grains" in the formula? They are not nutrients per se and are not included on the Nutrition Facts label.**

Whole grains are included because the *Dietary Guidelines for Americans* emphasizes the health benefits of whole grains and recommend that at least half of our grain and cereal servings should be whole grains. Whole grains are identified by using keywords that can be found in the ingredients list.

**38. This program is based on calories... why aren't serving sizes consistent with the Nutrition Facts label?**

Because serving sizes vary greatly a consistent unit of 100 calories was established. The standardization of all foods to a 100-calorie reference measure helps to keep the playing field level and makes it possible to compare foods in all categories, avoiding the confusion of the variable serving sizes. All of the Daily Values listed in the Nutrition Facts label for macro- and micronutrients are also linked to calories rather





than serving size.

**39. Does the program count vitamins that are naturally occurring differently from those that are added by fortification?**

Since the program is based on the Nutrition Facts label, it is impossible to determine the source of all the vitamins and minerals. However, to “control” for foods that are enriched or heavily fortified, it only “credits” a product’s score for a maximum of two vitamins and minerals.

**40. I often hear about “super nutrients.” Were these included in the rating system?**

Many foods are rich in ‘super nutrients’. Where FDA has established recommended intakes for nutrients, these are listed on the Nutrition Facts label and thus are included in the Guiding Stars program.

**41. Why do sugary cereals (General Mills Cookie Crisp for example) still receive stars?** Many cereals now include whole grains, higher fiber and are fortified with vitamins and minerals. Those that have these nutrients and limit added sugar and salt will often earn one or more Guiding Stars. The cereal aisle offers lots of choices, and while roughly 65% of cereals earn stars, there are still plenty of no-star items with very high sugar levels.

**42. Artificial colors are not included in any national nutrition policies so why does Guiding Stars debit for artificial colors?**

Guiding Stars scientific advisory panel has a charge to remain up to date on research and to recommend algorithm changes when there is overwhelming research that informs scientific consensus on a food attribute. Artificial colors, while not included in the most recent Dietary Guidelines for Americans have been widely researched and scientific consensus is that these should be limited in the diet. Due to the overwhelming research supporting the limitation of artificial colors in the diet, the scientific advisory panel decided to include a debit of one star for items containing artificial colors.