Scientific Justification for *Nutrition Keys* Front-of-Pack Label (FOP)

The *Nutrition Keys* system is grounded in sound, consensus nutrition science and research regarding consumer messaging about nutrition.

The recommendations of the 2005 *Dietary Guidelines for Americans* form the basis of the *Nutrition Keys* FOP labeling program. The Dietary Guidelines are used to inform and guide all federal food and nutrition policy decision making. They are developed following an intensive review of the available scientific evidence regarding dietary patterns and associated health outcomes**. In addition, the GMA Front-of-Pack nutrition labeling proposal is flexible and can accommodate changed recommendations following the upcoming release of the 2010 *Dietary Guidelines for Americans*.**

The premise of the *Dietary Guidelines for Americans* is that people should be meeting their nutrient needs through the consumption of foods as part of an overall healthy dietary pattern to help reduce the risk of chronic disease and obesity. In their totality, the recommendations of the Dietary Guidelines are meant to encourage Americans to eat fewer calories and make wiser food choices. For this reason, declaration of calories per serving is to be included in all *Nutrition Keys* labeling options.

A key recommendation of the 2005 *Dietary Guidelines for Americans* states: "Consume a variety of nutrient-dense foods and beverages within and among the basic food groups while choosing foods that limit the intake of saturated and trans fats, cholesterol, added sugars, salt, and alcohol."

In support of these key recommendations regarding nutrients to limit in the diet, in addition to calories, the *Nutrition Keys* program includes three nutrients to limit- saturated fat, sodium and total sugar.

The 2005 *Dietary Guidelines for Americans* acknowledge that foods provide nutrients and other compounds that have beneficial effects on health. Individuals are encouraged to eat nutrient dense foods so that they are able to meet their nutrient needs within their calorie allotment. However, it is known that some populations fail to consume adequate amounts of certain nutrients. Some of these nutrients to encourage include: potassium, fiber, vitamin A, vitamin C, vitamin D, calcium and iron. For this reason, up to two of the nutrients to limit listed above found in foods at least at the "good source" level (10 percent or more of the Daily Value per serving) can be declared in the *Nutrition Keys* labeling scheme.