

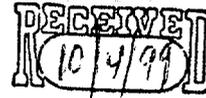


Melaleuca, Inc.

3910 South Yellowstone Hwy
Idaho Falls, Idaho 83402-6003
208 522-0700

SEP 27 1999

September 27, 1999



Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C Street, S.W.
Washington, DC 20204

Re: SECTION 403(r)(6) NOTIFICATION

Dear Sir or Madam:

In accordance with the requirements of section 403(r)(6) of the Federal Food, Drug and Cosmetic Act, Melaleuca, Inc., notifies FDA that it has begun using the following statements:

- ProstAvan is a combination of the highest-quality standardized extracts, including saw palmetto berry, pumpkin seed and lycopene, as well as the nutrient zinc. All of these ingredients have been shown to support the health of the prostate and help maintain normal urinary function in men.
- In fact, European studies show that saw palmetto and pumpkin seed help maintain proper urinary function and prostate health. These studies further showed that daily zinc supplements provide similar benefits.
- Finally lycopene, which comes from tomato products, is connected with healthier prostate functions and antioxidant protection.
- There's no need to avoid or ignore prostate needs. Try ProstAvan, Melaleuca's contribution to a healthy prostate.

These statements contain the statutory disclaimer. The name of the dietary supplement is ProstAvan™, and the relevant dietary ingredients are saw palmetto berry extract, pumpkin seed extract, and lycopene extract.

I certify that the foregoing is complete and accurate, and that Melaleuca, Inc., has substantiation that the statements are truthful and not misleading.

Very truly yours,

Melaleuca, Inc


McKay Christensen
Chief Operating Officer

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