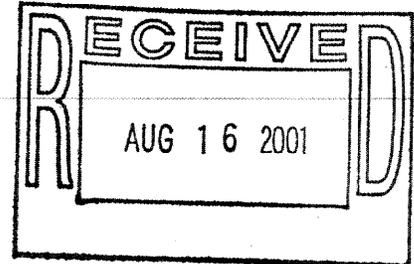


August 8, 2001

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The 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



Dear Sir/Madam:

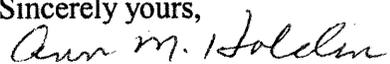
This is a notification pursuant to 21 U.S.C. 343(r)(6) that Standard Process Inc., Palmyra, Wisconsin 53156-0904, is making the following statements:

1. Two important minerals essential to life, potassium and iodine, as well as iron, phosphorus, manganese, magnesium, calcium, copper, zinc, and many other trace minerals are found in kelp.
2. Buckwheat extract from the green buckwheat plant provides the vitamin P complex, a source of rutin and other bioflavonoids. Rutin enhances adsorption of the vitamin C complex, promotes healthy circulation, supports bile production, and helps maintain healthy capillaries.
3. The trace minerals contained are important to the endocrine glands; iodine for the thyroid, manganese for the pituitary; and zinc for reproductive system health.

These statements are made for a dietary supplement containing a proprietary blend of kelp, alfalfa, magnesium citrate, dried pea (vine) juice, bovine orchic extract, bovine bone, dried buckwheat (leaf) juice, buckwheat (seed), defatted wheat (germ), oat flour, dicalcium phosphate, carrot (root), and peanut (bran). Other ingredients include manganese lactate, potassium para-aminobenzoate, honey, iron liver chelate, zinc liver chelate, copper liver chelate, calcium stearate, prolamine iodine (zein), and cyanocobalamin.. The name of the product is Allorganic Trace Minerals – B12®.

The information contained herein is accurate and Standard Process Inc. has substantiation that the statements are truthful and not misleading.

Sincerely yours,

  
Ann Holden  
Standard Process Inc.

978 0162 LET 8466

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