



Whole Food Supplements

1984 '03 APR 15 P1:55

March 19, 2003

MAR 31 2003

Office of Nutritional Products, Labeling and Dietary Supplements (HFS-810)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Pkwy.
College Park, MD 20740

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) OPC Synergy helps maintain a healthy cardiovascular system.
- (2) OPC reinforces vascular walls and makes them more pliable.
- (3) OPC Synergy helps support healthy brain tissue.
- (4) OPC can help maintain brain tissue exposed to free radicals.
- (5) OPC can also help maintain the integrity of blood vessels in the brain.
- (6) OPC encourages healthy brain function by improving vascular efficiency and by supporting the cells from challenge by cellular oxidation.
- (7) OPC decreases capillary leakage by making capillary walls stronger.
- (8) OPC Synergy helps restore collagen integrity.
- (9) OPC interferes with collagen destruction in a number of ways: regulates the amount of collagen links in connective tissue, fortifies collagen proteins, increases the ability of collagen to maintain itself, supports elastin, and improves overall tissue nutrition by strengthening capillary walls.

97S 0162

LET

11725

32972



Whole Food Supplements

- (10) The following is a short list of how OPC can help your body: supports cells in every part of the body from oxidation and free radicals
- (11) Supports the ability of collagen to rebuild itself; helps maintain collagen as we age
- (12) Increases the pliability and integrity of all types of blood vessel walls
- (13) Inhibits histamine release

These statements are made for a dietary supplement containing a proprietary blend of buckwheat juice powder, green tea leaf powder, and carrot powder. Other ingredients include gelatin, water, calcium stearate and colors. The name of the product is OPC Synergy™.

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.

