

PHARMATON
NATURAL HEALTH PRODUCTS



January 5, 1996

VIA HAND DELIVERY

Linda S. Kahl, Ph.D.
Office of Special Nutritionals
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C Street, SW (HFS-450)
Washington, D.C. 20204

Dear Dr. Kahl:

Pursuant to Section 6 of the Dietary Supplement Health and Education Act of 1994 ("DSHEA"), Pharmaton Natural Health Products, Division of Boehringer Ingelheim Corporation, wishes to notify the Food and Drug Administration that within the past 30 days the company has begun marketing a dietary supplement with a label which bears statements of nutritional support.

The dietary supplement for which the statements are made is GINSANA[®] capsules, which consist principally of standardized ginseng extract G115[®]. The statements of nutritional support read as follows:

"Energizing Dietary Supplement"

"Improves Oxygen Utilization"

"Enhances Physical Endurance".

"When taken as directed, GINSANA is a natural way to enhance your physical endurance by improving your body's ability to utilize oxygen more efficiently."

"Ginsana will help you maintain your natural energy and overall feeling of healthy well-being."

A copy of the packages for the product (30 and 60 capsule sizes) is attached. Please note that, while GINSANA[®] has been marketed since well before October 1994, these claims are just now being made in labeling for this product.

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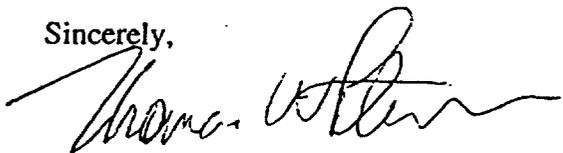
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These statements are accompanied by the required disclaimer indicating that the statements have not been evaluated by FDA and that the product is not intended to diagnose, treat, cure, or prevent any disease. (The disclaimer is in bold print.) The Company possesses adequate substantiation for these statements of nutritional support which renders the statements truthful and non-misleading, and thus permissible under the DSHEA.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas W. Peterson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Thomas W. Peterson

Enclosures