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August 8, 1996

James Tanner, PhD
Acting Director, Division of Programs and Enforcement Policy
Office of Special Nutritionals
Center for Food Safety and Applied Nutrition
HFS-450
200 C Street SW
Washington DC 20204

Dear Dr. Tanner,

Thank you for your letter from July 30, 1996 regarding structure/function claims for Schiff All Natural Echinacea Cold Season Formula and Schiff Phytocharged Lycopene products.

We will immediately cease distribution of the Echinacea product label, and submit another structure/function claim to be included on the new label.

The Lycopene product has not been distributed as of this date. The label will be changed before distribution.

Enclosed are copies of the revised structure/function claims for the two products, which are being submitted to the proper office. We welcome the opportunity to receive feedback from your office as we continue to interpret how to write structure/function claims as allowed by the Dietary Supplement Health and Education Act. Obviously, there are some areas of overlap between nutrient functions or their effects on body structures and health claims. We appreciate this period of interaction in order to more fully comply with your interpretation of health claims.

Please feel free to contact me if you have further questions or comments.

Sincerely,

Luke R. Bucci, PhD

cc: Dave Mastroianni, DeLois Shelton

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