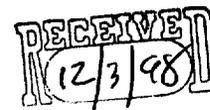




Whitehall-Robins
Five Giralda Farms
Madison, NJ 07940-0871
Telephone (973) 660-5500
Website address: <http://healthfront.com>

1335 '98 DEC 18 A10:31

November 25, 1998



Centrum® Herbals
Ginkgo Biloba

Notification of Statements on Dietary Supplement Labels

Elizabeth A. Yetley, Ph.D., R.D., Director
Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C Street, SW
Washington, D.C. 20204

Dear Dr. Yetley:

Reference is made to Centrum® Herbals, Ginkgo Biloba, marketed by Whitehall-Robins Healthcare ("Whitehall-Robins"), a division of American Home Products Corporation.

Pursuant to Section 403(r)(6) of the Federal Food, Drug and Cosmetic Act, as codified in 21 U.S.C. §343(r)(6), notification is submitted for statements made on the following dietary supplement product that has been marketed within the past 30 days.

Product Name: Centrum Herbals
Ginkgo Biloba

Ingredient: Ginkgo Biloba Extract (leaf) *Ginkgo biloba*
60 mg Capsule

**Company Name/
Address:** Whitehall-Robins Healthcare
Five Giralda Farms
Madison, New Jersey 07940

Statements on the Label:

1.) Front Panel of Label:

"helps maintain normal mental alertness, concentration, and memory"

2.) Back Panel of Label:

"This natural product is derived from the leaves of Ginkgo Biloba tree. It has been shown in clinical studies to:

- Help maintain normal mental alertness, concentration, and memory."

In accord with 21 CFR §101.93, the disclaimer statement is bolded and boxed on both panels of the carton where the claims appear.

The undersigned certifies that the information contained in this notice is complete and accurate, and that Whitehall-Robins has substantiation that the statements made are truthful and not misleading.

As required, the original and two copies of this notification are enclosed. If you have any questions regarding this information, please contact the undersigned at (973) 660-5751.

Sincerely,

WHITEHALL-ROBINS HEALTHCARE



Eleanor F. Barbo
Senior Director
Regulatory Affairs