

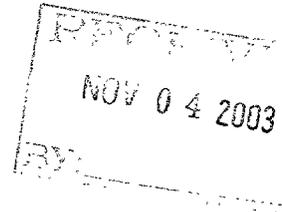


Shaklee Corporation

8725 '03 DEC -1 P152

October 31, 2003

Office of Special Nutritionals (HFS-810)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740



Re: Section 403(r)(6) Notification

Dear Sir or Madam:

In accordance with the requirements of section 403(r)(6) of the Federal Food, Drug, and Cosmetic Act, Shaklee Corporation hereby notifies FDA that it has begun using the following statements:

- Joint Health Complex (product name)
- Supports overall joint function
- Helps the body build cartilage for joints to promote comfortable movement
- Improves the cushioning in joints to facilitate movement and range of motion
- Promotes healthy and flexible joints
- Supports the body's ability to build cartilage, soothe and lubricate joints
- Improves joint function
- Enhances mobility by supporting joint lubrication
- In long-term clinical trials, people taking glucosamine experienced better mobility and no significant loss of the space within their knee joint, while that space narrowed in placebo-takers. Since cartilage helps fill the space within joints, these clinical findings support the idea that glucosamine helps stabilize and maintain cartilage.
- Glucosamine is a key building block for larger molecules such as proteoglycans—an important component of joint cartilage matrix. Proteoglycans attract fluid which swells and expands the matrix, giving cartilage elasticity, strength and resiliency. The breakdown and removal of proteoglycans is in balance with their formation. When this process is imbalanced, cartilage's water holding capacity is reduced, and cartilage is more susceptible to damage under normal joint motion. Under experimental conditions, making glucosamine available to the cells that manufacture the building blocks of cartilage (chondrocytes) promotes the production of proteoglycans.

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1992 Alpine Way, Hayward, California 94545

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- Cat's Claw has been clinically demonstrated to lessen joint discomfort. Experimental studies suggest that Cat's Claw may act by helping to block TNF-alpha and to inhibit certain chemical signals.
- Boron plays a role in hormone metabolism required for strong bones.

which contain the statutory statement, on the label and labeling for the following product:

Joint Health Complex Dietary Supplement

I certify that the foregoing is complete and accurate, and that Shaklee Corporation has substantiation that the statements are truthful and not misleading.

Sincerely,



Jack Hegenauer
Director, Health Sciences & Innovation
Shaklee Corporation