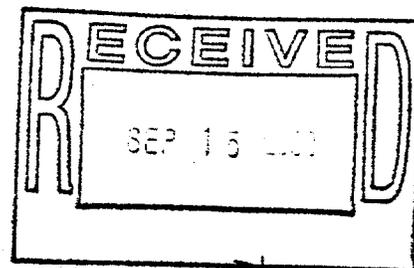


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August 30, 2000

The Office of Special Nutritionals (HFS-450)  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
200 C. Street S.W.  
Washington, DC 20204



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) Antioxidants – a group of vitamins, minerals, and enzymes that help keep the production of free radicals in check are the single most effective weapon at our disposal to keep free radicals in balance. Oligomeric proanthocyanidins (OPC), found in a variety of plants, fruits, and vegetables are flavanols considered to offer the strongest antioxidant properties. Their strength and superior bioavailability allows OPC to perform a number of positive, maintenance and supportive roles in every part of the body.
- (2) Keeps your circulatory system healthy.
- (3) OPC help maintain the properties of platelets. OPC make all blood vessel walls – from large arteries to tiny capillaries – stronger and more elastic.
- (4) Maintains collagen strength and elasticity.
- (5) Dr. Masquelier's thoroughly researched and patented OPC help strengthen collagen protein. They support and maintain collagen. OPC help restore and maintain skin resilience by protecting elastin from free radicals.
- (6) Maintains capillary integrity.
- (7) OPC help prevent leakage of fluid between cells by strengthening capillary walls.
- (8) Supports healthy brain function.
- (9) One of OPC's most desirable properties lies in their ability to penetrate both aqueous and lipid cellular membranes. They can cross the blood-brain barrier and provide antioxidant

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Whole Food Supplements

support to delicate brain tissue. OPC also provide vascular support to further promote healthy brain function.

- (10) Enlists the nutritional benefit of the whole green tea leaf plus extract to provide catechins and antioxidant support to red cells.
- (11) Organically grown buckwheat to help maintain vascular integrity.
- (12) Bilberry contains OPC and anthocyanosides to provide antioxidant support to vessel walls through collagen support.

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 natural 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.

