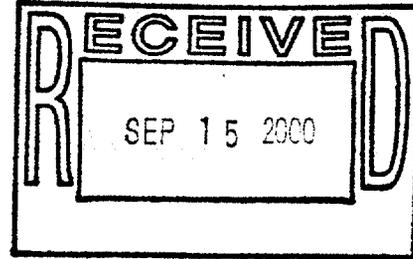


August 30, 2000

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



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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) Improves daily nutrition.
- (2) Supports healthy growth and development.
- (3) Buckwheat contains lysine, an essential amino acid required by children for proper growth and bone development.
- (4) Buckwheat contributes multiple minerals to promote proper blood and bone formation. Alfalfa is also loaded with minerals, and contains ample amounts of both vitamin K and coumesterol that work together to support proper bone density. Alfalfa offers a highly bioavailable source of protein, vitamins, and enzymes – important at any stage in life, but especially during the growing years.
- (5) Provides strong antioxidant protection and immune support.
- (6) Alfalfa, buckwheat, Brussels sprouts, barley grass, and kale all contain vital nutrients along with their synergistic co-factors to maintain cellular health, provide protection from free radical damage, and support immune function.
- (7) Ingredients from five different green-vegetable sources to ensure natural nutritional benefit and gain additional efficacy through the presence of synergistic co-factors.
- (8) Vacuum drying helps to preserve the enzyme quality which enhances the amount of enzymes available for fighting free radicals.

975-0162



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*Whole Food Supplements*

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These statements are made for a dietary supplement containing a proprietary blend of Brussels sprout powder (whole plant), kale powder, and alfalfa sprout powder (all organically grown). Other ingredients include gelatin, water, calcium stearate, and natural colors. The name of the product is SP™ Green Food.

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.

