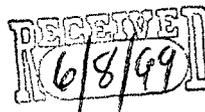




Whitehall-Robins
Five Giralda Farms
Madison, NJ 07940-0871
Telephone (973) 660-5500
Website address: <http://healthfront.com>

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September 3, 1999



Centrum®

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®, 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 structure/function statements made on the following dietary supplement product.

Product Name: Centrum
Ingredient: Multivitamin/Multimineral Supplement
**Company Name/
Address:** Whitehall-Robins Healthcare
Five Giralda Farms
Madison, New Jersey 07940

Statements on the Carton Label:

1.) Front of Label:

- Now with lutein. Helps maintain healthy eyes.*

2.) Top Back Flap of Label:

Nutrients that have been the subject of recent scientific study:

- Lutein – An antioxidant that helps maintain healthy eyesight.*

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- Vitamin C – An antioxidant vitamin important to the continued good health of the body's vital organ systems.*
- Vitamin E – An antioxidant vitamin that helps protect against cell damage.*
- Zinc – An antioxidant mineral essential for normal tissue renewal and skeletal development.*

In accord with 21 CFR §101.93, the disclaimer statement is bolded and boxed on all panels of the carton label where structure/function 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