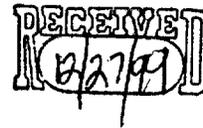




12/15/99

December 15, 1999



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) Maintains skeletal health.
- (2) The primary skeletal health role of vitamin C is to form collagen – the material that cements the cells of the body together and plays a primary role in all tissue growth and repair. Vitamin A is needed to synthesize RNA, essential to the normal growth process.
- (3) Encourages healthy skin.
- (4) Collagen, generated by adequate amounts of vitamin C, is also needed to maintain healthy skin. The vitamin P complex is often used to maintain capillary stability. Vitamin A helps support delicate epithelial tissue through proper protein synthesis.
- (5) Enhances immune response.
- (6) Vitamin C increases immune response in some cell lines. Both vitamin A and the vitamin P complex also help support and maintain the immune system.
- (7) Keeps your eyes healthy.
- (8) Vitamin A helps our eyes adapt to darkness. Adequate amounts of vitamin A are needed to keep many of the parts of the eye healthy. The vitamin P complex also helps support eye health.
- (9) Supports a healthy heart.

97S - 0162

68581
LET 4749



- (10) Both vitamin C and the bioflavonoids work to maintain healthy cholesterol levels in the blood.
- (11) Provides nutrients and support for the corresponding organs in humans.

These statements are made for a dietary supplement containing a proprietary blend of dried buckwheat juice, buckwheat (seed), carrot (root), calcium lactate, nutritional yeast, bovine adrenal, bovine kidney, alfalfa flour, dried alfalfa juice, magnesium citrate, mushroom, bovine bone, echinacea (root), defatted wheat (germ), oat flour, soy bean lecithin, veal bone, calcium acid phosphate, mixed tocopherols, peanut (bran), and carrot oil. Other ingredients include honey, ascorbic acid, calcium stearate, arabic gum, vitamin A palmitate, and gelatin. The name of the product is Cataplex® A-C-P.

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.

