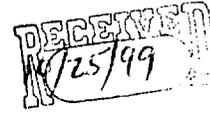




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October 21, 1999



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) Super-Eff contains both the vitamin F2 complex and the phospholipid factors important in the support of the central and peripheral nervous systems.*
- (2) Super-Eff also provides the precursors for necessary energy production.*

This statement is made for a dietary supplement containing a proprietary blend of carbamide, *Tillandsia usneoides*, bovine liver fat extract, flaxseed oil extract, and mixed tocopherols. Other ingredients include gelatin, water, calcium stearate, and natural colors. And the name of the product is Super-Eff®.

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.
975 - 0162

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