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October 26, 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 statement:

(1) Copper Liver Chelate should be used for the short-term restoration of copper levels.

This statement is made for a dietary supplement containing a proprietary blend of bovine liver, dried beet (root) juice, carrot (root), and oat flour. Other ingredients include copper liver chelate, honey, cellulose, and calcium stearate. And the name of the product is Copper Liver Chelate.

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.

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