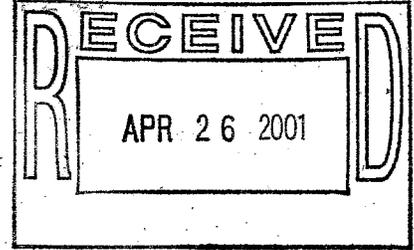


7930 01 JUN 11 02 07



April 24, 2001

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:

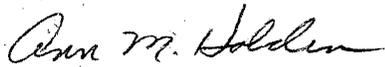
This is a notification pursuant to 21 U.S.C. 343(r)(6) that Standard Process Inc., Palmyra, Wisconsin 53156-0904, is making the following statements:

1. Betacol enhances the cleansing function of the liver and digestive systems, and supports their shared roles in metabolizing fats.

These statements are made for a dietary supplement containing a proprietary blend of Tillandsia usneoides, soy (bean), bovine liver PMG™ extract, betaine hydrochloride, calcium lactate, defatted wheat (germ), potassium bicarbonate, choline bitartrate, inositol, disodium phosphate, bovine adrenal Cytosol™ extract, oat flour, and ascorbic acid. Other ingredients include gelatin, water, niacinamide, pyridoxal 5 phosphate, natural colors, and calcium stearate. The name of the product is Betacol®.

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.

97S 0162 LET 4953



75649