



Shaklee Corporation
Hacienda Campus
4747 Willow Road
Pleasanton, CA 94588-2740

Telephone 925 / 924-2000

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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

Re: Section 403(r)(6) Notification

Dear Sir or Madam:

In accordance with the requirements of section 403(r)(6) of the Federal Food, Drug, and Cosmetic Act, Shaklee Corporation notifies FDA that it has begun using the following statements:

The first multi-enzyme digestive aid for everything you eat

Alleviates gas, bloating and feeling of fullness – includes targeted enzymes to help digest common “problem” foods such as dairy and gas-producing vegetables including beans and broccoli

Want less belching, bloating, digestive cramps and embarrassing flatulence?

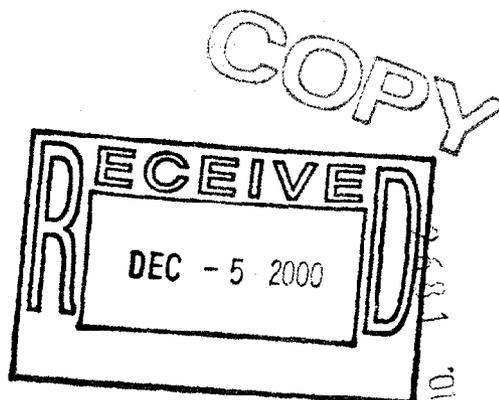
Shaklee EZ-Gest offers as-needed relief for the unwanted results of incomplete digestion of foods

Unlike popular single-function digestive aids, Shaklee EZ-Gest offers plant-based, comprehensive digestive support

Supports complete digestion of the fat, protein and carbohydrates in all foods

A comprehensive enzyme product designed to support the normal digestion of protein, fat and complex carbohydrates, the major components of a healthy meal. Shaklee EZ-Gest contains beta d-galactosidase, better known as the lactase enzyme, which helps the body break down the sugar lactose, found in milk and other dairy foods. EZ-Gest also contains alpha d-galactosidase, a special enzyme that breaks down the complex sugars found in gas-producing foods such as beans and cabbage.

EZ-Gest enzymes are “acid-resistant” and have the capacity to function within a range of pH that is compatible with that of the stomach during digestion. When taken along with problem foods such as dairy or beans, EZ-Gest enzymes are in



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the right place at the right time to assist with breaking down the complex molecules of these foods.

The plant-based enzymes in EZ-Gest are derived through natural fermentation, and support digestion of all food groups:

Beta d-Galactosidase – helps digest the lactose, or milk sugar, found in dairy products.

Alpha d-Galactosidase – helps digest the complex sugars found in beans and other legumes, and in cruciferous vegetables such as cabbage, cauliflower and broccoli.

Protease – helps break down the peptide bonds in protein foods. The use of multiple proteases – each specific to different pH ranges – improves the activity of EZ-Gest by supporting digestive reactions at different gastrointestinal sites to rapidly increase the rate of nutrient breakdown.

Amylase – helps to digest the starchy carbohydrates in foods such as breads, pasta and potatoes.

Lipase – helps to digest the fats in foods.

Studies suggest that the amount of lactase in EZ-Gest should significantly improve the digestion of lactose in a typical serving of dairy foods. Clinical studies indicate that ingesting alpha d-galactosidase with a meal of beans or other gas-producing foods should allow most people to consume a typical serving of these foods with greater ease and comfort.

which contain the statutory statement, on the following product:

Shaklee EZ-Gest™

I certify that the foregoing is complete and accurate, and that Shaklee Corporation has substantiation that the statements are truthful and not misleading.

Very truly yours,



Christopher Jensen, PhD
Vice President, Scientific Affairs

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