



Nutrition for Optimal Wellness

November 3, 2005

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Food and Drug Administration
 Center for Food Safety and Applied Nutrition
 Office of Nutritional Products, Labeling, and Dietary Supplements
 Division of Nutritional Programs and Labeling
 200 C Street SW
 Washington, DC 20204



Re: 21 U.S.C. Section 343(r)(6), Notification of Statements on Dietary Supplements

Dear Sir/Madam:

I hereby notify the Food and Drug Administration ("FDA") of the use of statements of nutritional support in the labeling of CLA, a dietary supplement.

Statements being made in the labeling of CLA:

- (1) CLA (Conjugated Linoleic Acid) is a fatty acid naturally found in beef and dairy products. However, due to changes in agricultural practices, today's foods contain less CLA, contributing to its decreased availability in modern diets. Numerous clinical studies have demonstrated CLA's role in the maintenance of healthy body weight through its favorable effect on body composition. These studies have shown that CLA supplementation can help burn fat while promoting the production of lean tissue without adverse side effects. Furthermore, initial body composition changes with CLA supplementation are maintained over time, indicating its prolonged positive effects.
- (2) Reduces Body Fat
- (3) Increases Lean Muscle Mass
- (4) Enhances Fat Burning

To the best of my knowledge, and based upon information and belief present at the time of the executing of this notice, I certify that the above information is accurate and complete. NOW Foods possesses substantiation that the statements are truthful and not misleading.

Michael Lelah, Ph.D.
 Technical Director
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