



6090 '98 SEP 11 P1 53 August 27, 1998

RECEIVED
8/31/98

Ms. Linda S. Kahl, Ph.D.
Office of Special Nutritionals
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C Street, S.W. (HFS-450)
Washington, DC 20204

Dear Dr. Kahl:

Pursuant to section 403(r)(6) of the Dietary Supplement Health and Education Act of 1994 ("DSHEA"), General Nutrition Corporation, located at 300 Sixth Avenue, Pittsburgh, Pennsylvania 15222 ("GNC"), hereby notifies the Food and Drug Administration that it is marketing dietary supplements that bear a nutritional support statement on their labels. Enclosed please find a listing of the products and their statements of nutritional support.

As required, the product labels contain the disclaimer that this statement has not been evaluated by the Food and Drug Administration and that the product is not intended to diagnose, treat, cure, or prevent any disease. Two (2) copies of this notification are enclosed for your convenience.

On behalf of GNC, I hereby certify that the information contained in this notice is complete and accurate and that GNC has substantiation that the statements are truthful and not misleading.

Very truly yours,

John P. Troup
Vice President
Scientific Affairs

JPT/clp
Enclosures

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FDA NOTIFICATION TRACKING FORM FOR STRUCTURE FUNCTION STATEMENT

<updated 8-27-98>

DESCRIPTION	DATE FILED	STRUCTURE FUNCTION STATEMENT
ACETYL-CARNITINE		
NNW Herbal Thermogenic Women's Formula	8/27/98	Acetyl-Carnitine facilitates the metabolism of long chain fatty acids.
ACIDOPHILUS		
NNW Cleansing Formula Dietary Supplement	8/27/98	Acidophilus organisms help maintain a healthy digestive tract.
GNC Preventive Nutrition Colon Care Formula	8/27/98	Acidophilus organisms help maintain a healthy digestive tract.
ALPHA-LIPOIC ACID		
NNW Chol-x Formula	8/27/98	alpha-Lipoic Acid helps maintain the function of the cardiovascular system and acts as a protective antioxidant.
AMINO ACIDS		
GNC Pro Performance Whey Protein Concentrate	8/27/98	The body requires protein to break down into amino acids, which are used by the body after exercise.
ARGININE		
GNC Arginine Uptake	8/27/98	Arginine is involved in creatine formation.
BETA-CAROTENE		
GNC Preventive Nutrition beta-Carotene Formula	8/27/98	beta-Carotene is an antioxidant nutrient that can be safely converted to Vitamin A in the body.
GNC Women's Cal-Plus	8/27/98	beta-Carotene is a precursor to Vitamin A which is essential for normal vision.
B-VITAMINS		
GNC LvR Program	8/27/98	B-vitamins help support the metabolic process.
GNC Women's Vita Pak	8/27/98	B-vitamins are essential for carbohydrate metabolism and energy production.
NNW Women's Soy Support	8/27/98	B-vitamins are essential for carbohydrate metabolism and energy production.
NNW Vitamin B-100 Complex Formula Yeast Free	8/27/98	B-vitamins are essential for carbohydrate metabolism and energy production.
GNC Preventive Nutrition Liver Program	8/27/98	B-vitamins help support the metabolic processes in the body.
GNC Children's Vita Moooooo!	8/27/98	B Vitamins help support the body's metabolic processes and are essential for energy production.

CALCIUM AND MAGNESIUM		
GNC Women's Vita Pak	8/27/98	Calcium and Magnesium are essential for building teeth and bones.
NNW Calcium Liquigels	8/27/98	Calcium and Magnesium are essential for building teeth and bones.
GNC Children's Vita Moooooo!	8/27/98	Calcium taken in increments throughout childhood and adult years increases peak bone density later in life and also delays bone loss later in life.

CAROTENOIDS		
GNC Preventive Nutrition beta-Carotene Formula	8/27/98	Carotenoids are powerful antioxidants from natural plant sources.

CAYENNE		
NNW Cayenne	8/27/98	Cayenne provides dietary support for healthy digestive function.

CITRUS FIBER		
NNW Chol-x Formula	8/27/98	Citrus Fiber (as citrus pectin), provides dietary support for healthy cholesterol levels.

CLA		
GNC X-Phedra with CLA	8/27/98	X-Phedra with CLA is an all natural herb-based formula designed to increase energy levels and maximize workouts.

COPPER		
GNC Copper	8/27/98	Copper is involved in red blood cell formation.

CO Q-10		
NNW CO-Q10 Formula Just for Health	8/27/98	Coenzyme Q-10 is involved in the process that produces cellular energy.

CREATINE		
Challenge Creatine Monohydrate	8/27/98	Challenge chewable Creatine tablets provide support for immediate energy production for high intensity workouts and is involved in energy production in skeletal muscle.

DHA		
GNC Preventive Nutrition NeuroSupport	8/27/98	DHA is important to neuronal integrity.
NNW DHA	8/27/98	DHA is important for visual and neuronal integrity.
NNW DHA Docosahexaenoic Acid	8/27/98	DHA is important for cardiovascular health, visual function and neuronal integrity.
GNC Preventive Nutrition Memorall Program	8/27/98	DHA provides a dietary support for nervous system function. DHA is important for visual function and neuronal integrity.

EFA (ESSENTIAL FATTY ACIDS)

NNW EFA Formula	8/27/98	These EFAs contain Omega-3 Fatty Acids, DHA and EPA, which provide dietary support for a healthy cardiovascular and nervous system.
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FISH BODY OILS (EPA & DHA)

GNC LvR Program	8/27/98	Fish body oils (EPA & DHA) help support the cardiovascular system.
GNC Preventive Nutrition Liver Program	8/27/98	Fish body oils (EPA & DHA) help support the cardiovascular system.

FOLIC ACID

GNC Women's Vita Pak	8/27/98	Folic Acid may play a role in the maintenance of normal homocystiene levels.
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FRUCTOOLIGOSACCHARIDES (FOS)

GNC Preventive Nutrition Colon Care Formula	8/27/98	FOS is a natural plant-based food source for acidophilus and helps establish a healthy environment in which those organisms can flourish in the intestines.
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GAMMA LINOLENIC ACID

Gamma Linolenic Acid	8/27/98	Gamma linolenic acid helps maintain a healthy inflammatory response.
GNC Women's Phytoestrogen	8/27/98	GLA provides dietary support for normal, healthy cardiovascular system function.

GINGKO BILOBA

GNC Preventive Nutrition Memorall Program	8/27/98	Gingko biloba supports increased blood flow to the brain.
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GLUCOSAMINE AND CHONDROITIN

NNW Arth Formula	8/27/98	Glucosamine & Chondroitin support healthy joints and bones.
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GLUCOSAMINE SULFATE

NNW Joint Formula Just For Health	8/27/98	Glucosamine Sulfate provides an important component for joint cartilage.
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GLUTHIONE

GNC Pro Performance Whey Protein Concentrate	8/27/98	Glutahione is a natural antioxidant which may support the immune system during intense exercise.
GNC Pro Performance Triple Whey	8/27/98	Glutahione is a natural antioxidant which provides dietary support for the immune system during strenuous exercise.

IRON

GNC Women's Vita Pak	8/27/98	Iron is essential to building blood and transporting oxygen.
GNC Children's Vita Mooooo!	8/27/98	Iron is involved in muscle function and building blood.

LECITHIN

GNC LvR Program	8/27/98	Lecithin may help the body emulsify fat.
GNC Preventive Nutrition Liver Program	8/27/98	Lecithin helps the body emulsify fat.

MILK THISTLE

GNC LvR Program	8/27/98	Milk Thistle supports healthy liver function.
GNC Preventive Nutrition Liver Program	8/27/98	Milk Thistle supports healthy liver function.

NERVONIC ACID

GNC Men's Neurocite	8/27/98	Nervonic Acid helps support healthy nervous system function.
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PHOSPHATIDYL SERINE

GNC Preventive Nutrition NeuroSupport	8/27/98	Phosphatidyl Serine helps support healthy nervous system function and development.
GNC Preventive Nutrition Memorall Program	8/27/98	Phosphatidyl Serine helps support healthy nervous system development and function.

PROTEIN

GNC Pro Performance Triple Whey	8/27/98	The body requires protein because the protein will eventually break down into amino acids that are used by the body after exercise or workout sessions.
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PSYLLIUM

NNW Cleansing Formula Dietary Supplement	8/27/98	Psyllium helps maintain a healthy digestive tract.
GNC Preventive Nutrition Colon Care Formula	8/27/98	Psyllium helps clean the colon.

SAW PALMETTO

GNC Men's Prosta-Form	8/27/98	Vitamin E and Saw Palmetto support normal prostate function.
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SELENIUM

NNW Cell Formula	8/27/98	Selenium supports the antioxidant activity of Vitamin E.
NNW Chol-x Formula	8/27/98	Selenium helps maintain the function of the cardiovascular system & acts a protective antioxidant.

SOY

NNW Women's Soy Support	8/27/98	Soy supports healthy cardiovascular function.
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ST. JOHN'S WORT

GNC Preventive Nutrition Memorall Program	8/27/98	St. John's Wort may help support general well being.
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SYNEPHERINE		
GNC Optibolic Synephrine 4	8/27/98	Synepherine provides a thermogenic response in the body.

TYROSINE		
GNC Preventive Nutrition NeuroSupport	8/27/98	Tyrosine is a nutrient precursor for neurotransmitters in the body.

VANADYL SULFATE		
NNW Vanadyl Sulfate	8/27/98	Vanadyl Sulfate may have a positive effect on glucose metabolism.

VITAMIN B-6		
GNC Women's Vita Pak	8/27/98	Vitamin B-6 & B-12 may play a role in the maintenance of normal homocysteine levels.
GNC Men's Arginine Uptake	8/27/98	Vitamin B-6 is essential for nervous system function.

VITAMIN B-12		
NNW Women's Soy Support	8/27/98	Vitamin B-12 may play a role in the maintenance of normal homocysteine levels.
GNC Men's Arginine Uptake	8/27/98	Vitamin B-12 is essential for nerve tissue formation. Vitamin B-12 is also essential for energy production and red blood cells.

VITAMIN C		
GNC Women's Vita Pak	8/27/98	Vitamin C is essential for healthy bones, teeth, blood vessels & collagen.
NNW Vitamin C Protector Antioxidant	8/27/98	Vitamin C is essential for healthy bones, teeth, blood vessels & collagen.
NNW Arth Formula	8/27/98	Vitamin C is essential for healthy bones, teeth, blood vessels & collagen.
NNW Cell Formula	8/27/98	Vitamin C helps protect cells against free radical damage.
NNW Ester-C with Bioflavonoids	8/27/98	Vitamin C provides antioxidant support to help protect cells from free radical damage.
GNC Preventive Nutrition C-Complex	8/27/98	Vitamin C is essential for healthy bones, teeth, blood vessels & collagen. As a free radical scavenger, Vitamin C is an important antioxidant.
	8/27/98	Vitamin C is essential for healthy bones, teeth and blood vessels and is necessary for the absorption of iron.
GNC Women's Cal-Plus	8/27/98	Vitamin C provides antioxidant support for the skin.

VITAMIN D		
GNC Women's Vita Pak	8/27/98	Vitamin D is necessary for healthy teeth and bones.
GNC Children's Vita Mooooo!	3/27/98	Vitamin D is necessary for healthy teeth and bones and enhances calcium absorption.

VITAMIN E		
GNC Women's Vita Pak	8/27/98	Vitamin E helps maintain the proper function of the cardiovascular system.
GNC Men's Prosta-Form	8/27/98	Vitamin E & Saw Palmetto support normal prostate function.
		Vitamin E provides dietary support which may help improve prostate health.
NNW Chol-x Formula	8/27/98	Vitamin E helps maintain the function of the cardiovascular system & acts as a protective antioxidant.
GNC Preventive Nutrition E-Complex Formula	8/27/98	Vitamin E provides dietary support important to maintaining a healthy lifestyle including support for healthy heart, lung, prostate and digestive tract functions.
GNC Children's Vita Mooooo!	8/27/98	Vitamin E provides dietary support for a healthy immune system.
GNC Women's Cal-Plus	8/27/98	Vitamin E for antioxidant impact and to help maintain the proper function of the cardiovascular system.

ZINC		
GNC Men's Arginine Uptake	8/27/98	Zinc is required for normal reproductive function.