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Mr. Christopher Jensen, Ph.D.
Vice President, Scientific Affairs
Shaklee Corporation
Hacienda Campus
4747 Willow Road
Pleasanton, California 94588-2740

Dear Dr. Jensen:

This is in response to your letter of August 31, 2000 to the Food and Drug Administration (FDA) pursuant to 21 U.S.C. 343(r)(6) (section 403(r)(6) of the Federal Food, Drug, and Cosmetic Act (the Act)). Your submission states that Shaklee Corporation is making the following claims, among others, for the product CorEnergy:

“...retaining normal blood cholesterol levels.”

21 U.S.C. 343(r)(6) makes clear that a statement included in labeling under the authority of that section may not claim to diagnose, mitigate, treat, cure, or prevent a specific disease or class of diseases. The statement that you are making for this product suggests that it is intended to treat, prevent, cure, or mitigate disease, namely, hypercholesterolemia. This claim does not meet the requirements of 21 U.S.C. 343(r)(6). This claim suggests that this product is intended for use as a drug within the meaning of 21 U.S.C. 321(g)(1)(B), and that it is subject to regulation under the drug provisions of the Act. If you intend to make claims of this nature, you should contact FDA's Center for Drug Evaluation and Research (CDER), Office of Compliance, HFD-310, 7520 Standish Place, Rockville, Maryland 20855.

Please contact us if we may be of further assistance.

Sincerely,

John B. Foret
Director
Division of Compliance and Enforcement
Office of Nutritional Products, Labeling,
and Dietary Supplements
Center for Food Safety
and Applied Nutrition

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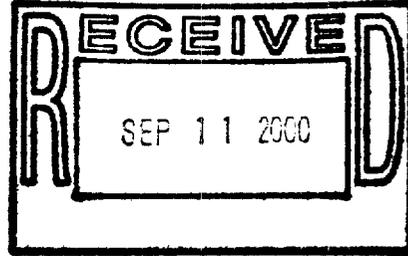


Shaklee Corporation
Hacienda Campus
4747 Willow Road
Pleasanton, CA 94588-2740

Telephone 925 / 924-2000

August 31, 2000

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:

To promote vitality

CorEnergy contains standardized extracts of Cordyceps, Ginseng and Green Tea - specifically teamed to promote vitality.

Codyceps is clinically proven to help fight everyday fatigue.

Ginseng is traditionally used as an energizer.

The antioxidant properties of polyphenols in Green Tea promote sustained vitality.

[A unique, natural concentrated source of herbal adaptogens and antioxidant phytonutrients] shown to support your body's own ability to maintain energy and resist everyday fatigue.

Cordyceps has been extensively tested in China and found to fight everyday fatigue, possibly by promoting more efficient use of oxygen and enhancing cardiovascular health.

Traditionally, ginseng is used to revitalize and replenish vital energy.

An adaptogen, ginseng has a traditional reputation for balancing bodily functions.

Shaklee Corporation

Tea is the richest dietary source of the antioxidant phytonutrients called polyphenols, known to promote sustained vitality. A recent case-control study from the Boston Area Health Study found that consuming one or more cups of tea per day promoted cardiovascular health.

Nutritional support for sustained vitality

Three capsules a day will provide a continuing benefit of sustained enduring energy to help you meet the demands of your day, every day.

Each of the herbal ingredients in CorEnergy are believed to promote vitality by supporting and strengthening key bodily systems.

In 1991, the German Commission E approved the use of Panax Ginseng as a tonic for "invigoration" and fortification in times of fatigue and debility, for declining capacity for work and concentration.

Laboratory studies also show that green tea raises the total antioxidant capacity of the blood, suggesting an additional mechanism for its cardiovascular health benefits.

Vitamins, minerals, phytonutrients and herbs for energy, stamina, and nutritional support for lifelong health.

Shaklee CorEnergy helps provide sustained enduring energy in a formula based on standardized extracts of herbs with clinical studies in Europe and centuries of use in Asia.

Population studies have shown improved health of the mouth, pancreas, colon, skin, lung, prostate, bladder and digestive tract associated with tea consumption. Tea consumption has also been linked to improved cardiovascular health and retaining normal blood cholesterol levels.

Ginseng: Recommended for 2,000 years to maintain long-term good health. Used to fortify the body against fatigue, revitalize and replenish energy and enhance resistance to stress.

Energy that lasts

Energy that endures

A sustained vitality that won't let you down no matter what the day has in store for you.

New Shaklee CorEnergy. When you need to get up and go and go and go.

Shaklee Corporation

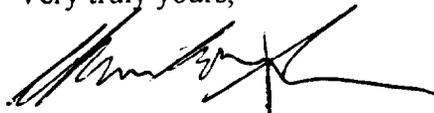
Only CorEnergy combines clinically proven and traditionally used ingredients to keep you running at your best no matter when your day ends.

which contain the statutory statement, on the following product:

CorEnergy™

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,

A handwritten signature in black ink, appearing to read 'Christopher Jensen', with a large, stylized flourish extending to the right.

Christopher Jensen, PhD
Vice President, Scientific Affairs