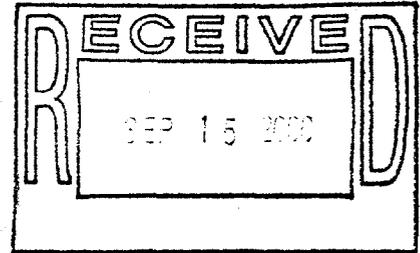


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August 30, 2000



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) Supports healthy physical, mental, and emotional development.
- (2) Supplies aggressive antioxidant protection to help maintain cellular health and stability.
- (3) Detoxifies the liver and promotes the consistent removal of cellular debris.
- (4) Rutin helps support a healthy cardiovascular system and also helps keep blood vessels strong, but pliable.
- (5) Contains vitamins B1 and B2, and the minerals potassium, magnesium, phosphate, and iron, - plus choline to support liver function.
- (6) Contains many vitamins and minerals including vitamin K and coumesterol that join forces to support proper bone density.
- (7) Contains chlorophyll, particularly fat soluble, which protects cells from a number of environmental toxins.
- (8) Well recognized for their ability to protect cells from abnormal growth and division, and cleanse the liver.
- (9) Glucosinate compounds found in these two green vegetables break down into indoles and isothiocyanates to provide cellular protection and aid in liver detoxification. Kale supplies carotenoids-a class of compounds related to vitamin A that offer antioxidant protection to the eyes.

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*Whole Food Supplements*

- (10) The buckwheat, Brussels sprouts, kale, and barley grass in SP Green Food bring a number of antioxidants together to help keep free radical formation in check.
- (11) Cleanses the liver and encourages efficient cellular debris removal.
- (12) Brussels sprouts and kale help maintain cellular health by supplying nutrients that work to detoxify the liver. The phytonutrients in these two green vegetables help protect many of our major organs. Nutrients found in Brussels sprouts and kale promote enzymatic activity required to help detoxify the liver. They also stimulate the natural process designed to clear damaged cells from the body.

These statements are made for a dietary supplement containing a proprietary blend of Brussels sprout powder (whole plant), kale powder, and alfalfa sprout powder (all organically grown). Other ingredients include gelatin, water, calcium stearate, and natural colors. The name of the product is SP™ Green Food.

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.

