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January 24, 2005

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C Street, SW
Washington, DC 20204

FEB - 2

Dear Sir or Madam:

This notification is being made, as required by Section 403 (r)(6)(c) of the Food, Drug and Cosmetic Act, that Inverness Medical, Inc. intends to market dietary supplement products with the following labeling statement of nutritional support:

**Protegra® Antioxidant
Vitamin & Mineral Supplement**

- Antioxidant helps protect against cell damage and premature aging.
- Research has shown that our bodies may benefit from higher levels of antioxidants than we get from a normal diet or multivitamin. Protegra provides precisely balanced antioxidant vitamins with trace minerals at levels higher than can be obtained from a typical diet or multivitamin. Protegra's vitamins and minerals are precisely formulated at levels similar to those documented in scientific studies to optimize health and nutritional benefits.
- Vitamins E, C and A work together to help neutralize damaging free radicals.
- Vitamins E, C and A recognized as the most powerful antioxidant vitamins to help protect against cell damage.
- Selenium, Zinc, Copper & Manganese assist in the process of neutralizing free radicals to optimize cell protection.

**Protegra® Cardio
Vitamin & Mineral Supplement**

- Triple action heart support.
- Protegra Cardio's precisely balanced vitamin and mineral formula helps maintain cholesterol levels that are already in the normal range. It also contains the specialized nutrients you need to break down homocysteine to support healthy arteries. And now Protegra Cardio provides Omega-3's to promote a healthy blood lipid profile, and natural-source Vitamin E, which delivers twice the bioavailability of synthetic forms.
- Protegra Cardio's powerful antioxidant formula has been trusted for years by cardiologists in maintaining heart health.
- Researchers at leading medical institutions have also demonstrated that an intake above the recommended daily values of Folic Acid and Vitamin B6 may help maintain low homocysteine levels.
- Vitamins E, C, & Beta Carotene plus Selenium, Zinc, Copper, & Magnesium help maintain cholesterol levels that are already in the normal range and provide extra

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antioxidant protection.

- Vitamins B6, B12 and Folic Acid help break down homocysteine to support healthy arteries.
- Omega-3's promote normal triglyceride levels and a healthy blood lipid profile.

Triomega®

Omega-3 Dietary Supplement

Triomega - For Heart, Mind & Joints

- Omega-3 fatty acids are stored in a variety of cells and therefore have *beneficial effects on many parts of the body, including the heart, mind and joints.* The latest research indicates that increased consumption of Omega-3's can help stabilize the heart's electrical function, support healthy arteries and blood lipid levels, maintain emotional balance and cognitive function, and enhance joint flexibility and comfort.
- Dozens of clinical studies concerning the effects of Omega-3's on humans have been published in scientific journals over the past 15 years. In addition, population studies show a lower incidence of many lifestyle diseases where populations have high intakes of Omega-3 fatty acids.
- Suggested daily dosage is one (1) Triomega softgel per day, delivering 500 mg EPA+DHA. This is based on the American Heart Association's (AHA) recommendation for healthy adults to eat fatty fish at least twice per week. It is consistent with the daily intake recommended by many experts for general good health.
- Some medical professionals recommend greater doses of Omega-3's, as high as 2 grams of EPA & DHA per day, in order to realize specific health benefits.
- Years of clinical research have shown that Omega-3's are essential to your health.
- Omega-3's are essential fatty acids that play a key role in a host of bodily functions. Because they are stored in many different types of cells, Omega-3's are vital to the health of your heart, joints, brain and central nervous system.
- Triomega gives you 500 mg of EPA + DHA - the most important Omega-3's - in a single softgel. This is the daily dose recommended by many experts for good health.

SoyCare™ for Menopause

Dietary Supplement

- Reduces hot flashes & night sweats.
- For relief of Menopausal discomfort.
- As you mature, your production of hormones slows down, which can result in hot flashes, vaginal dryness, and night sweats. Soy isoflavones are a natural plant hormone (phytoestrogen) that help you to reduce the everyday discomfort of menopause, while also supporting your body against other effects of hormone loss. Studies have shown that soy isoflavones deliver a host of other benefits for women.

- Soy Care for Menopause provides a concentrated mix of soy isoflavones (natural plant estrogens), similar to that found in Asian diets, to help reduce some of the everyday symptoms of menopause. Studies show that the use of soy isoflavones can reduce the frequency and intensity of hot flashes and night sweats.

Posture®

Calcium Supplement

- For healthy bones.
- Contains Calcium Phosphate for no gas distress.
- More calcium per tablet for healthy bones.
- Formulated with Tricalcium Phosphate which is as easily absorbed as Calcium for milk.
- Contains Phosphorus because Calcium alone is not enough for healthy bones.
- Contains Phosphorus for healthy bones.
- Phosphorus is an essential component of bone, with 85% of the phosphorus in your body found in your bones. According to recent studies, consuming calcium with phosphorus is more effective at building strong bones than consuming calcium alone.
- If you are among the 50 MILLION American women who don't obtain the daily RDI for phosphorus from their normal diet, YOU need Posture, the ONLY leading calcium supplement that contains the ratio of calcium to phosphorus found in healthy bones.

Posture®-D

Calcium Supplement

- For healthy bones.
- Contains Calcium Phosphate for no gas distress.
- Vitamin D added to help your body absorb calcium.
- More calcium per tablet for healthy bones.
- Formulated with Tricalcium Phosphate which is as easily absorbed as Calcium for milk.
- Contains Phosphorus because Calcium alone is not enough for healthy bones.
- Vitamin D and Magnesium help your body absorb calcium.
- Contains Phosphorus for healthy bones.
- Phosphorus is an essential component of bone, with 85% of the phosphorus in your body found in your bones. According to recent studies, consuming calcium with phosphorus is more effective at building strong bones than consuming calcium alone.
- If you are among the 50 MILLION American women who don't obtain the daily RDI for phosphorus from their normal diet, YOU need Posture-D, the ONLY leading calcium supplement that contains the ratio of calcium to phosphorus found in healthy bones.

Stresstabs®

High Potency B-Complex Dietary Supplement

- Puts back what physical stress takes out.
- B-Complex Vitamins: Aid in converting food into energy.
- Antioxidant Vitamins C&E: Help protect cells against damage and boost your body's defenses against oxidative stress.
- Folic Acid: Combined with Vitamins B6 and B12 to help maintain normal homocysteine levels in your blood stream.

- Stresstabs formula contains many of the essential nutrients your body can't store. Stresstabs replenish these nutrients to help restore energy that physical stress takes out.

Stresstabs® + Iron

High Potency B-Complex Dietary Supplement

- Puts back what physical stress takes out.
- B-Complex Vitamins: Aid in converting food into energy.
- Antioxidant Vitamins C&E: Help protect cells against damage and boost your body's defenses against oxidative stress.
- Folic Acid: Combined with Vitamins B6 and B12 to help maintain normal homocysteine levels in your blood stream.
- Iron: Helps build healthy blood cells that carry oxygen to every cell of your body.
- Stresstabs formula contains many of the essential nutrients your body can't store. Stresstabs replenish these nutrients to help restore energy that physical stress takes out.

Stresstabs® + Zinc

High Potency B-Complex Dietary Supplement

- Puts back what physical stress takes out.
- B-Complex Vitamins: Aid in converting food into energy.
- Antioxidant Vitamins C&E: Help protect cells against damage and boost your body's defenses against oxidative stress.
- Folic Acid: Combined with Vitamins B6 and B12 to help maintain normal homocysteine levels in your blood stream.
- Zinc: Assists immune system and overall recuperation.
- Stresstabs formula contains many of the essential nutrients your body can't store. Stresstabs replenish these nutrients to help restore energy that physical stress takes out.

Ferro-Sequels®

High Potency Iron Supplement

- Gentle to your system.
- Optimal absorption with less gastric upset.
- Ferro-Sequels are specially formulated Timed-release tablets that are easy to swallow. They deliver iron slowly to maximize absorption, and gently to reduce stomach upset.
- The effective way to treat iron deficiency.

Z-Bec®

B-Complex Supplement

- Researchers at leading medical institutions have demonstrated that an intake above the recommended daily values of B6, B12, and Folic Acid may help maintain low homocysteine levels. Z-Bec's high potency formula now contains the high levels of Folic Acid needed to break down homocysteine and support a healthy cardiovascular system.
- Zinc: Assists immune system and overall recuperation.
- B-Complex Vitamins: Aid in converting food into energy. Helps cells function normally.
- E: Serves as an antioxidant.
- C: Promotes cell growth and repair.

AllBee® With C

B-Complex Supplement

- Researchers at leading medical institutions have demonstrated that an intake above the recommended daily values of Folic Acid and Vitamin B6 may help maintain low homocysteine levels. The AllBee Plus Vitamin C high potency formula now contains the high levels of Folic Acid and Vitamin B6 needed to break down homocysteine and support a healthy cardiovascular system.
- B-Complex Vitamins: Aid in converting food into energy. Help cells function normally.
- Vitamin C: Promotes cell growth and repair, while serving as an antioxidant.

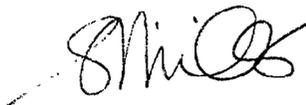
AllBee® C-800

B-Complex Supplement

- Researchers at leading medical institutions have demonstrated that an intake above the recommended daily values of Folic Acid, Vitamins B6 and B12 may help maintain low homocysteine levels. The AllBee C-800 high potency formula now contains the high levels of Folic Acid, Vitamin B6 and Vitamin B12 needed to break down homocysteine and support a healthy cardiovascular system.
- B-Complex Vitamins: Aid in converting food into energy. Help cells function normally.
- Vitamin C: Promotes cell growth and repair, while serving as an antioxidant.
- Vitamin E: Serves as an antioxidant.

If you have any questions regarding this information, please do not hesitate to contact me.

Best regards,



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