

Wyeth

Wyeth Consumer Healthcare
Five Giralda Farms
Madison, NJ 07940

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April 21, 2005

Centrum® Silver® Chewables

APR 21 2005

Notification of Statements on Dietary Supplement Labels

Division of Compliance and Enforcement
Office of Nutritional Products, Labeling and Dietary Supplements
Food and Drug Administration
(HFS-810)
5100 Paint Branch Parkway
College Park, MD 20740-3835

Dear Sir/Madam:

Reference is made to Centrum Silver Chewables, marketed by Wyeth Consumer Healthcare, a division of Wyeth.

Pursuant to Section 403(r)(6) of the Federal Food, Drug and Cosmetic Act, as codified in 21 U.S.C. §343(r)(6), notification is submitted for structure/function statements made on the following dietary supplement product.

Product Name: Centrum Silver Chewables

Ingredients: Vitamin A (75% as Beta Carotene), Vitamin C, Vitamin D, Vitamin E, Thiamin, Riboflavin, Niacin, Vitamin B₆, Folic Acid, Vitamin B₁₂, Biotin, Pantothenic Acid, Calcium, Phosphorus, Iodine, Magnesium, Zinc, Selenium, Copper, Manganese, Chromium, Molybdenum, Nickel, Silicon, Tin, Vanadium, Lutein.

Company Name/ Wyeth Consumer Healthcare
Address: Five Giralda Farms
Madison, NJ 07940-0871

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Statements on side of outer carton:

- Beta-Carotene – An antioxidant form of vitamin A.
- Vitamin B₆ – A higher level to help your body convert food to energy.
- Vitamin B₁₂ – Higher levels because dietary needs increase with age.
- Calcium – A higher level to help strengthen and maintain healthy bones.
- Vitamin E – A higher level to help protect against cell damage.
- Manganese – An essential trace mineral for bone and connective tissue development.
- Folic Acid – May help maintain heart health.
- Centrum[®] Silver[®] Chewables is specially adjusted with higher levels of certain age essential nutrients like calcium, B vitamins and antioxidants to keep pace with your (adults 50+) changing nutritional needs.

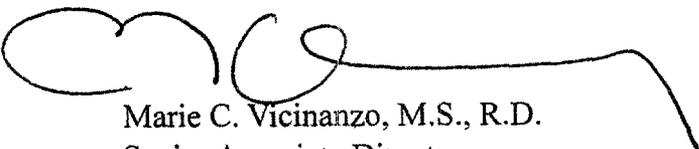
In accord with 21 CFR §101.93, the disclaimer statement is bolded and boxed on all panels of the carton label where structure/function claims appear.

The undersigned certifies that the information contained in this notice is complete and accurate, and that Wyeth Consumer Healthcare has substantiation that the statements made are truthful and not misleading.

As required, the original and two copies of this notification are enclosed. If you have any questions regarding this information, please contact the undersigned at (973) 660-5848.

Sincerely,

WYETH CONSUMER HEALTHCARE



Marie C. Vicinanza, M.S., R.D.
Senior Associate Director
Regulatory Affairs