

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration Washington, DC 20204

3624 '01 MAR 16 A7:16 FEB 22 2001

Mr. Christian Rochon President World Marketing Direct Selling, Inc. 101 Federal Street Suite 1900 Boston, Massachusetts 02110

Dear Mr. Rochon:

This is in response to your letters of January 10, 2001 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 World Marketing Direct Selling, Inc. is making the following claims, among others, for the following products:

MealAid

"Relief for acid indigestion - gas- stomach pain.

Cholesterlo

"Maintain healthy 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 statements that you are making for these products suggest that they are intended to treat, prevent, cure or mitigate diseases. These claims do not meet the requirements of 21 U.S.C. 343(r)(6). These claims suggest that these products are intended for use as drugs within the meaning of 21 U.S.C. 321(g)(1)(B), and that they are 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.

975 0163 LET 452

Page 2 - Mr. Christian Rochon

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

Copies:

FDA, Center for Drug Evaluation and Research, Office of Compliance, HFD-300 FDA, Office of the Associate Commissioner for Regulatory Affairs, Office of Enforcement, HFC-200

FDA, New England District Office, Office of Compliance, HFR-NE240

cc:

HFA-224 (w/incoming) HFA-305 (docket 97S-0163) HFS-22 (CCO) HFS-800 (r/f, file) HFS-810 HFS-811 (file) HFD-310 HFD-314 (Aronson) HFS-605 HFV-228 (Benz) GCF-1 (Nickerson) f/t:HFS-811:rjm:2/16/01:docname:74120.adv:disc54



World Marketing Direct Selling, Inc.

Direct Shopping Customer

Mailing Address: 101 Federal Street Suite 1900 Boston, MA 02110 www.wmds.net

Telephone: (617) 342-7340 Fax: (617) 342-7339

74120

January 10, 2001



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

Dear Sir or Madam:

Notice is hereby given pursuant to the requirements of section 403(r)(6) (21 U.S.C. 343(r)(6) of the Federal Food, Drug, and Cosmetic Act and in accordance with the requirements of 21 CFR 101.93, that WMDS, Inc., 50 Maynard Street #119, Attleboro, Massachusetts 02703, within the past 30 days commenced marketing a dietary supplement bearing the following statement(s) on the label and/or in the labeling:

MealAid – Relief for acid indigestion – gas – stomach pain. Increases enzyme levels and aids in digestion

The undersigned certifies that the information contained in this notice is complete and accurate and that WMDS, Inc. has substantiation that this statement is truthful and not misleading.

Sincerely

Christian Roc

President



World Marketing Direct Selling, Inc.

Direct Shopping Customer

www.wmds.net

Telephone: (617) 342-7340 Fax: (617) 342-7339

74120

Mailing Address: **101 Federal Street** Suite 1900 Boston, MA 02110

JAN 2 2 2001

CEI

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

Dear Sir or Madam:

January 10, 2001

Notice is hereby given pursuant to the requirements of section 403(r)(6) (21 U.S.C. 343(r)(6) of the Federal Food, Drug, and Cosmetic Act and in accordance with the requirements of 21 CFR 101.93, that WMDS, Inc., 50 Maynard Street #119, Attleboro, Massachusetts 02703, within the past 30 days commenced marketing a dietary supplement bearing the following statement(s) on the label and/or in the labeling:

Cholesterlo - Maintain healthy cholesterol levels

The undersigned certifies that the information contained in this notice is complete and accurate and that WMDS, Inc. has substantiation that this statement is truthful and not misleading.

Sincerely.

Christian Rochon

President