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January 14, 2002

RECEIVED
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Office of Nutritional Products Labeling
and Dietary Supplements (HFS-810)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C St. SW.,
Washington, D.C. 20204

Re: Notification for Statements on Dietary Supplement Labels

Dear Sir/Madam:

This firm represents Nature's Sunshine Products, Inc., Provo, Utah, a manufacturer and distributor of dietary supplement products (hereinafter "Nature's Sunshine"). Nature's Sunshine has requested that we notify your Agency on its behalf of the inclusion of statements of nutritional support on its dietary supplement product labels.

Pursuant to the requirements of Section 6 of the Dietary Supplement Health and Education Act of 1994, 21 U.S.C. §343(r)(6), and in accordance with the authorized provisions of 21 CFR §101.93(a), your Agency is hereby notified that Nature's Sunshine has made statements of "nutritional support", as described in 21 U.S.C. §343(r)(6)(A), for its dietary supplements as follows:

<u>Product Name</u>	<u>Label Statement(s)</u>
MACA	Nourishes male and female reproductive system. Enhances mental and physical strength. Promotes stamina/reduces fatigue. Glandular system support.
Phyto-Soy	Glandular and circulatory system support.
Pyruvate	Promote weight loss. Enhance fat loss. This unique, natural blend of ingredients offers a powerful, natural alternative designed to help

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maintain muscle tissue during weight loss.

Target P-14 Formula

Digestive system support. As chelates, these minerals are readily absorbed to target specific body systems. Chromium and zinc are chelated to glycine and cysteine, both of which are required in the normal pancreatic function of glucose metabolism. Chromium is an essential part of GTF (Glucose Tolerance Factor).

L-Glutamine

Nervous System support.

Target Endurance Formula

As chelates, these minerals are readily absorbed and targeted to specific body systems. Target minerals of copper, potassium and zinc are chelated to the amino acids arginine, leucine and glycine, all of which are required to produce energy in the mitochondria of cells.

Target TS II Formula

Glandular system support. As chelates, these minerals are readily absorbed and targeted to specific body systems. The Target minerals of zinc and manganese are chelated to the amino acids glutamine, proline and histidine. TRH (thyrotropin releasing hormone) from the hypothalamus gland is a tripeptide of glutamine, proline and histidine

Liquid Chlorophyll

Digestive tract detoxifier. Support intestinal health. Supports circulatory health. Intestinal and circulatory system support. Chlorophyll in plants performs metabolic functions such as respiration and growth. Interestingly, the chlorophyll molecule is chemically similar to human blood, except that its central atom is magnesium, whereas that of human blood is iron.

Free Amino Acids

Helps attain optimum muscle mass. Helps develop muscle tissue and density. Free Amino Acids is designed to develop muscle tissue, mass, and density during physical activity, stress, and recovery. L-Carnitine helps transport fats into the mitochondria to be burned for energy. magnesium helps to activate enzymes necessary for

carbohydrate and amino acid metabolism.

Hydrated Bentonite

Cleanses and detoxifies intestinal tract. Absorbs toxins. Intestinal system support. Take one tablespoonful with a glass of water twice daily as an aid for detoxification via the alimentary canal.

Collatrim

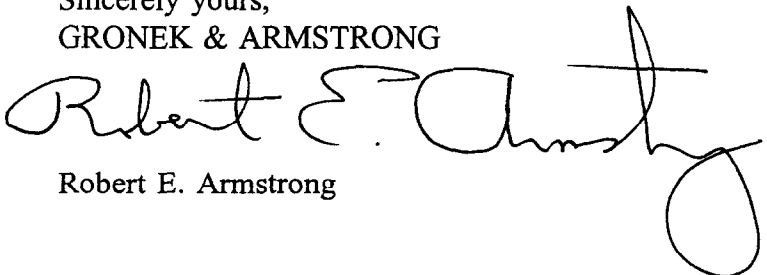
Weight management. Joint and skin health. For weight management. For joint and skin health. Weight management and structural support. Collatrim is designed to support weight management by utilizing high levels of protein and important amino acids contained in our premier source of collagen. Collatrim helps the body obtain a favorable ratio of the fat burning hormone insulin and the fat burning hormone glucagon, while stimulating the release of human growth hormone, which burns fat and strengthens and supports muscle tissue. Collagen is also important for healthy skin and strong joints.

Sunshine Daily Essentials

Sunshine Daily Essential for adults aids in the digestion of all foods except dairy products. Chosen especially for adults, these products help maintain good health by providing vitamins, minerals, antioxidants and herbs that will help every adult to maximize their daily nutritional intake. They help to neutralize free radicals which are highly active molecules that can cause cell damage. Proanthocyanidins readily cross the blood/brain barrier to help protect vital brain and nerve tissue from oxidative damage.

The undersigned hereby certifies on behalf of Nature's Sunshine that the information contained in this correspondence is complete and accurate.

Sincerely yours,
GRONEK & ARMSTRONG



Robert E. Armstrong

CC: Nature's Sunshine Products, Inc.