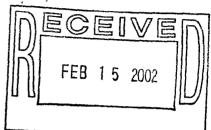


February 8, 2002



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

Dear Sir or Madam:

Pursuant to Section 403(r)(6) of the Federal Food, Drug and Cosmetic Act and Section 101.93 of FDA's regulations, we hereby notify you that we are using the following statement(s):

- (1) Name and address of manufacturer:
 Pharmavite Corporation, PO Box 9606, Mission Hills, CA 91346
- (2) Text of the statement(s): Zinc is abundant throughout the body, with the highest concentrations in the eyes, kidneys, brain, liver, skin, hair, and nails. Zinc plays a role in more than 20 reactions in the body, and is necessary for normal growth and development. In particular, the immune system needs zinc to function properly. Zinc is required for improving the sense of taste, especially in the elderly and people with anorexia nervosa. It also has antioxidant activity to help protect the body from damaging substances called free radicals that attack our cells. Zinc is also important for a healthy pregnancy.
- (3) Name of the dietary ingredient if not provided in the text of the statement: Zinc (from zinc gluconate)
- (4) Name of the dietary supplement: Zinc 50 mg

The above statement(s) may be used in one or more of the following brands of products: B.J.'s Wholesale, CVS, Duane Reade, Kirkland Signature, Jogmate, Nature Made, Nature's Resource, Optimize, Spring Valley, Walgreens.

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We certify the information in this notice is complete and accurate, and we have substantiation that the above statement(s) is truthful and not misleading.

Sincerely,

David Kropp

Acting Director, Regulatory and Consumer Affairs