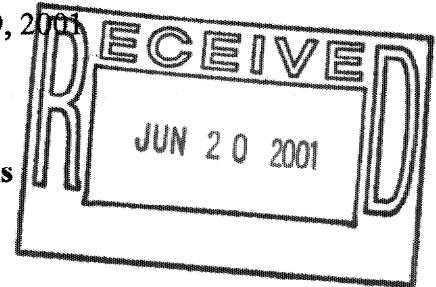




Eleanor F. Barbo
Senior Director, Regulatory Affairs

Whitehall-Robins Healthcare
Five Giralda Farms
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June 19, 2001



Centrum®

Notification of Statements on Dietary Supplement Labels

Dr. Robert Moore, Branch Chief
Dietary Supplements Branch (HFS-811)
Division of Compliance and Enforcement
Office of Nutritional Products, Labeling, and Dietary Supplements
Food and Drug Administration
200 C Street, SW
Washington, D.C. 20204

Dear Dr. Moore:

Reference is made to Centrum® Single Entities, marketed by Whitehall-Robins Healthcare ("Whitehall-Robins"), a division of American Home Products Corporation.

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 dietary supplement products listed in Attachment A.

The company name and address for all products listed in Attachment A is as follows:

Whitehall-Robins Healthcare
Five Giralda Farms
Madison, New Jersey 07940-0871

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

975 0162 LET 8233

Whitehall-Robins Healthcare
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The undersigned certifies that the information contained in this notice is complete and accurate, and that Whitehall-Robins 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) 660-5751.

Sincerely,

WHITEHALL-ROBINS HEALTHCARE



Eleanor F. Barbo
Senior Director
Regulatory Affairs

Attachment A

Product Name	Ingredient	Statements on Label
Vitamin B ₆ 100 mg	Vitamin B ₆	<ul style="list-style-type: none"> . Helps maintain normal protein metabolism. . Important for nervous system function.
Vitamin B ₁₂ 500 mcg	Vitamin B ₁₂	<ul style="list-style-type: none"> . Helps build red blood cells. . Helps maintain normal nervous system function.
Vitamin B ₁₂ 1000 mcg	Vitamin B ₁₂	<ul style="list-style-type: none"> . Helps build red blood cells. . Helps maintain normal nervous system function.
Vitamin B100 Complex	Thiamin, Riboflavin, Niacin, Vitamin B ₆ , Folic Acid, Vitamin B ₁₂ , Biotin, Pantothenic Acid	<ul style="list-style-type: none"> . Provide the body with energy by converting carbohydrates into glucose. . Important for normal nervous system function.
Folic Acid 400 mcg	Folic Acid	<ul style="list-style-type: none"> . A key nutrient required during child bearing years.
Vitamin C 250 mg	Vitamin C	<ul style="list-style-type: none"> . Important for proper immune system function. . Works with Vitamin E to help prevent LDL oxidation, which may help maintain a healthy circulatory system. . Essential for healthy teeth, gums, and bones.
Vitamin C 500 mg	Vitamin C	<ul style="list-style-type: none"> . Important for proper immune system function. . Works with Vitamin E to help prevent LDL oxidation, which may help maintain a healthy circulatory system. . Essential for healthy teeth, gums, and bones.
Vitamin C 1000 mg	Vitamin C	<ul style="list-style-type: none"> . Important for proper immune system function. . Works with Vitamin E to help prevent LDL oxidation, which may help maintain a healthy circulatory system. . Essential for healthy teeth, gums, and bones.
Chewable Vitamin C 250 mg	Vitamin C	<ul style="list-style-type: none"> . Important for proper immune system function. . Works with Vitamin E to help prevent LDL oxidation, which may help maintain a healthy circulatory system. . Essential for healthy teeth, gums, and bones.
Chewable Vitamin C 500 mg	Vitamin C	<ul style="list-style-type: none"> . Important for proper immune system function. . Works with Vitamin E to help prevent LDL oxidation, which may help maintain a healthy circulatory system. . Essential for healthy teeth, gums, and bones.
Vitamin E 400 IU	Vitamin E	<ul style="list-style-type: none"> . May help maintain a healthy circulatory system by helping to prevent LDL oxidation. . Helps prevent the destruction of red blood cells.

Vitamin E 1000 IU	Vitamin E	<ul style="list-style-type: none"> • May help maintain a healthy circulatory system by helping to prevent LDL oxidation. • Helps prevent the destruction of red blood cells.
Natural Vitamin E 400 IU	Vitamin E	<ul style="list-style-type: none"> • May help maintain a healthy circulatory system by helping to prevent LDL oxidation. • Helps prevent the destruction of red blood cells.
Water Dispersible Vitamin E 200 IU	Vitamin E	<ul style="list-style-type: none"> • May help maintain a healthy circulatory system by helping to prevent LDL oxidation. • Helps prevent the destruction of red blood cells.
Water Dispersible Vitamin E 400 IU	Vitamin E	<ul style="list-style-type: none"> • May help maintain a healthy circulatory system by helping to prevent LDL oxidation. • Helps prevent the destruction of red blood cells.
Beta Carotene 25,000 IU	Vitamin A as Beta Carotene	<ul style="list-style-type: none"> • Antioxidant that helps maintain normal eye and immune function.
Iron 25 mg	Iron	<ul style="list-style-type: none"> • Vital for cells to generate energy. • Essential for the formation of blood.
Magnesium 200 mg	Magnesium	<ul style="list-style-type: none"> • Essential in converting blood sugar into energy. • Essential for effective nerve and muscle function.
Potassium 99 mg	Potassium	<ul style="list-style-type: none"> • Helps maintain normal heart muscle function. • Supports water balance within the body.
Selenium 200 mcg	Selenium	<ul style="list-style-type: none"> • Essential component of the body's antioxidant defense system. • Helps protect cells from damage caused by free radicals.
Zinc 30 mg + Copper 4 mg	Zinc, Copper	<ul style="list-style-type: none"> • Helps maintain the body's natural defense system. • Vital for normal growth and development.
Calcium 600 mg + Vitamin D	Vitamin D, Calcium Carbonate	<ul style="list-style-type: none"> • Helps maintain strong bones. • Helps regulate heartbeat.
Calcium 250 mg with Vitamin D and Minerals	Vitamin D, Calcium Citrate, Magnesium, Zinc, Copper, Manganese, Boron	<ul style="list-style-type: none"> • Helps maintain strong bones. • Helps regulate heartbeat.
Calcium, Magnesium and Zinc + Other Trace Minerals	Vitamin D, Calcium, Magnesium, Zinc, Copper, Manganese, Boron	<ul style="list-style-type: none"> • Helps maintain strong bones. • Calcium plus six additional nutrients, essential for healthy bone formation.

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Chromium Picolinate	Chromium Picolinate	<ul style="list-style-type: none">• Aids in proper Glucose metabolism.• Aids in carbohydrate, protein, and fat metabolism.
Coenzyme Q10 60 mg	Coenzyme Q10	<ul style="list-style-type: none">• Antioxidant that helps protect against free radical damage.
Omega 3 Fatty Acids	Fish oil providing EPA and DHA	<ul style="list-style-type: none">• Helps maintain heart health.
Complete Antioxidant Formula	Vitamin A, Vitamin C, Vitamin E, Zinc, Selenium, Copper, Manganese	<ul style="list-style-type: none">• Helps protect cells from free radical damage caused by environmental and physical stress.• May help maintain heart, eyes, and immune function.