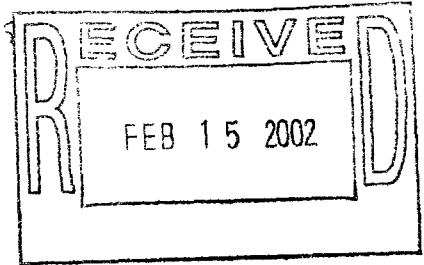




February 8, 2002



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):
Red Panax Ginseng, also known as Asian, Chinese or Korean Ginseng, is the most popular and most researched form of Ginseng. Ginseng itself, is not intended to treat specific disease, but rather to support health. It is described as an "adaptogen", a phrase used by herbalists to refer to a plant that helps the body adapt to physical and mental stress (perhaps by affecting hormone levels), by stimulating the body when it's run down, or relaxing the body when it's stressed. It is believed that ginseng's ability to alleviate fatigue involves the modulation of the hypothalamic-pituitary-adrenal axis (HPA). This can induce the secretion of adrenocorticotrophic hormones. Ginseng also has the ability to stimulate the CNS. Substances called "ginsenosides" are believed to be the active compounds in ginseng.
- (3) Name of the dietary ingredient if not provided in the text of the statement:
Asian ginseng (chinese red panax, root, powdered extract)
- (4) Name of the dietary supplement:
Ginseng Chinese Red Panax Extract

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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PHARMAVITE

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