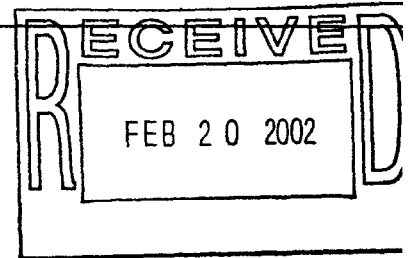




Melaleuca, Inc.

3910 South Yellowstone Hwy
Idaho Falls, Idaho 83402-6003
208 522-0700



January 29, 2002

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

Re: SECTION 403(r)(6) NOTIFICATION

Dear Sir or Madam:

In accordance with the requirements of section 403(r)(6) of the Federal Food, Drug and Cosmetic Act, Melaleuca, Inc., notifies FDA that it has begun using the following statements:

- Advanced formula Replenex® contains glucosamine HCL to maintain healthy cartilage and joint function – plus a proprietary blend of bromelain, ginger, and green tea extracts to help improve mobility and flexibility.
- Glucosamine helps keep your cartilage lubricated and helps it maintain its slippery texture.
- When taken regularly, Replenex® helps maintain your body's natural supply of glucosamine, so it has the building blocks it needs to keep your joints in good repair.
- This advanced formula also includes an exclusive blend of herbs and antioxidants to help improve glucosamine uptake and combat the effects of free radical damage.
- Bromelain, an enzyme extracted from the pineapple plant, ginger, one of the most widely used spices in the world, and green tea extract – are effective in preventing free radical damage and its side effects. All three have proven effective in promoting and maintaining healthy joint function.
- The bioflavonoids in green tea extract help keep the collagen (an important part of cartilage) strong and resilient. They also prevent free radical damage.
- The natural way to maintain healthy joints.
- An exclusive blend of bromelain, ginger, and green tea extract help maintain healthy functioning joints.
- A natural way to maintain healthy joint function.

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- Studies have shown that supplementing your diet with just 1500 mg glucosamine goes a long way toward preserving healthy joint function.
- Provides the body with the research-recommended dose of glucosamine to support the body's efforts in preserving healthy joint cartilage. When taken regularly, Replenex® helps maintain your body's natural supply of glucosamine so it has the building blocks it needs to keep your joints in good repair.
- Replenex® increases your body's long-term natural supply of glucosamine plus important herbs and botanicals shown to help maintain overall joint health.

These statements contain the statutory disclaimer. The name of the dietary supplement is Replenex®, and the relevant dietary ingredients are glucosamine HCL, ginger root extract, green tea extract, and bromelain.

I certify that the foregoing is complete and accurate, and that Melaleuca, Inc., has substantiation that the statements are truthful and not misleading.

Very truly yours,

Melaleuca, Inc.



Jeff Wasden
V.P. Product Marketing