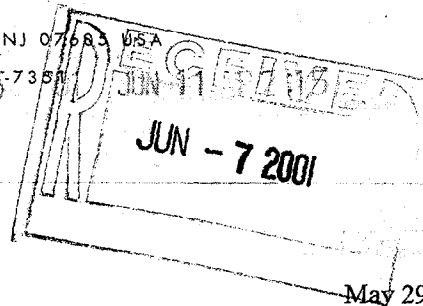




SOLGAR VITAMIN AND HERB
WORLD HEADQUARTERS



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May 29, 2001

Mr. John B. Foret - Director
Division of Compliance & Enforcement
Office of Nutritional Products, Labeling & Dietary Supplements
Food & Drug Administration - Center for Food Safety & Applied Nutrition
200 "C" Street, S.W.
Washington, DC 20204

Reference: Food & Drug Administration Correspondence dated May 16, 2001.

Dear Mr. Foret:

Reference is made to your letter of May 16, 2001 commenting on label claims for Naturvite Natural Vitamins **Folic Acid 400 mcg** and **Women's Multiple** submitted by letter dated April 19, 2001 pursuant to 21 CFR 343(r)(6)(section 403(r)(6). Specifically that the statement: "...reduce the risk of having a child born with neural tube defects", is not of nutritional support but is a health claim.

The claims on both labels will be changed to those authorized by the FDA in 21 CFR 101.79.

1. For Naturvite Women's Multiple (533 mcg folic acid, 133% DV):
 - "Women who consume healthful diets with adequate Folic Acid may reduce their risk of having a child with birth defects of the brain or spinal cord."

will replace,

 - "...Folic Acid which may reduce the risk of having a child with neural tube birth defects;...."
2. For Naturvite Folic Acid 400 mcg (100% DV):
 - "Adequate Folic Acid in healthful diets may reduce a woman's risk of having a child with a brain or spinal cord birth defect."

will replace,

 - "Folic Acid may reduce the risk of having a child born with neural tube birth defects."

Please feel free to contact me if you require further information.

Yours truly,

William Coogan
Manager cGMP Compliance
Solgar Vitamins & Herb

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