GRONEK & ARMSTRONG ATTORNEYS AT LAW 98TH FLOOR - SEARS TOWER 233 SOUTH WACKER DRIVE 2:16 CHICAGO, ILLINOIS 60606 DENNIS M. GRONEK TEL: (312) 655-1800 ROBERT E. ARMSTRONG FAX: (312) 655-1808 PAUL J. WISNIEWSKI June 1, 2001 DEBORAH L. RUSS JACQUELINE P. KULER Office of Nutritional Products, Labeling and Dietary Supplements (HFS-810) Center for Food Safety and Applied Nutrition U.S. Food and Drug Administration 200 C Street S.W. Washington, DC 20204 Re: Notification for Statements on Dietary Supplement Labels

Dear Sir/Madam:

This firm represents Nature's Sunshine Products, Inc., of Provo, Utah, a manufacturer and distributor of dietary supplement products (hereafter "Nature's Sunshine"). Nature's Sunshine has requested that we notify your Agency on its behalf of the inclusion of statements of nutritional support on its dietary supplement product labels.

Pursuant to the requirements of Section 6 of the Dietary Supplement Health and Education Act of 1994, 21 U.S.C. §343(r)(6), and in accordance with the authorized provisions of 21 CFR §101.93(a), your agency is hereby notified that Nature's Sunshine has made statements of "nutritional support", as described in 21 U.S.C. 343(r)(6)(A), for its dietary supplements as follows:

Product Name

Label Statement

Coral Calcium

Ultimate Greenzone

Valerian

Vitamin

Vitamin E

Vitamin C Ascorbates

Vitamin E with Selenium

Whole Leaf Aloe Vera

Immune System Support. These non-acidic ascorbates are easier on the stomach and may benefit people who have difficulty taking higher potencies of ascorbic acid. Beta-carotene is added for its antioxidant properties.

Structural System Support, pH Balancing;

Nervous System Support. Nutritional support for restful sleep. Provides soothing and calming properties.

Vital Nutritional Support.

Helps body offset acidity.

Vital Nutritional Support.

Immune System Support.

Vital Nutritional Support. Powerful antioxidant formula, supports heart health.

General Nutritional Support.

975 0162 LET 81/3

Wild Yam & Chaste Tree

X-A

Women's X-Action

Men's X-Action

Yarrow

Yellow Dock

Yerba Santa/Senega Combination

Yucca

Zinc

Female Glandular System Support. Supports female glandular system, provides menopause relief. Wild yam root and chaste tree have long been used separately for female health. Combining them works synergistically to promote balance in women.

Glandular System Support. Important for glandular health, supports the prostate gland, boosts energy level.

Glandular and Nervous System Support. Boosts energy level, increases sexual desire, improves sexual performance. This product is especially designed to support the emotion, energy and vitality levels of women. This formula will help boost the activity level and enhance women's response to external stimuli.

Male Vital Nutritional Support. Increases sexual desire, improves sexual performance, promotes prostate health.

Respiratory System Support.

Urinary and Circulatory System Support.

Respiratory System Support. These herbs... are especially beneficial during seasonal changes.

Structural System Support.

Zinc is a trace mineral essential for proper growth and development, and is involved in numerous metabolic processes in individuals of all ages.

The undersigned hereby certifies on behalf of Nature's Sunshine that the information contained in this correspondence is complete and accurate.

Sincerely yours, GRONEK & ARMSTRONG Robert E. Armstrong	A

PJW:REA: pr

CC: Nature's Sunshine Products, Inc.

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