

On August 24, 2001, BotanicLab posted an Adobe pdf of an FDA laboratory report which states that no DES was detected in the PC-SPES sample collected and analyzed. An examination of the data clearly shows that the FDA detection limit was higher than the levels of DES found by 2 independent testing laboratories, which explains why the FDA "found none".

$$\begin{aligned} 1 \text{ gram (gr.)} &= 1,000 \text{ milligrams (mg.)} \\ 1 \text{ mg} &= 1,000 \text{ micrograms (}\mu\text{g.)} \end{aligned}$$

The FDA took 0.5 gr. (500 mg.) product and extracted it with 15 ml of solvent

$$\frac{0.5 \text{ gr. product}}{\text{per 15 ml solvent}} = \frac{0.033 \text{ gr. product}}{\text{per 1 ml}} = \underline{33 \text{ mg. product per one ml solvent}}$$

$$\text{The FDA detection limit (for DES) is: } \frac{0.0563 \text{ mg.}}{\text{per ml}} = \frac{56 \mu\text{g}}{\text{per ml}}$$

Since the amount of DES (if any) extracted from 33 mg. of product is in one ml solvent, then this corresponds to:

$$\frac{56 \mu\text{g DES}}{\text{per 33 mg product}} = 1.7 \mu\text{g DES per mg product as the LOWEST amount they call positive}$$

$$\frac{1.7 \mu\text{g DES}}{\text{mg}} \times \frac{320 \text{ mg}}{\text{capsule}} \text{ would be equal to } 544 \text{ mg. DES per capsule}$$

The amounts of DES reported by 2 labs were on the order of 10 to 200 μg DES per capsule. Even at the highest end, these amounts would have been "invisible" in the FDA analysis.