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United States of America
FEDERAL TRADE COMMISSION
Washington, D.C. 20580

May 19, 2021

WARNING LETTER

VIA EMAIL TO info@seaweedandco.com

Dr. Craig Rose
Seaweed & Co.
Space@ Park View Lofts
228 Park View
Whitley BayNE26 3QR, United Kingdom

Re: Unsubstantiated claims for Coronavirus prevention or treatment

Dear Dr. Rose:

This is to advise you that the staff of the United States Federal Trade Commission, the national consumer protection agency, reviewed your websites at <https://www.seaweedandco.com/> and <https://www.weedandwonderful.co.uk> in April 2021. We also reviewed your social media websites at <https://www.facebook.com/doctorseaweed>, <https://twitter.com/DoctorSeaweed>, and <https://instagram.com/doctorseaweed/>, where you direct consumers to your websites at <https://www.seaweedandco.com/> and <https://www.weedandwonderful.co.uk> to purchase Puresea seaweed products and Doctor Seaweed's Weed & Wonderful Immunity + Seaweed Capsules. We have determined that you are unlawfully advertising that certain products prevent or treat Coronavirus Disease 2019 (COVID-19).

Some examples of Coronavirus prevention or treatment claims include:

- In a March 10, 2021 blog post titled "IS VITAMIN D THE SHINING LIGHT FOR IMMUNITY?" at <https://www.weedandwonderful.co.uk/blogs/news/is-vitamin-d-the-shining-light-for-immunity?>, you state:

"OUR IMMUNE SYSTEMS HAVE A KEY ROLE TO PLAY IN MAINTAINING OUR OVERALL HEALTH, AND VITAMIN D COULD HELP TO SUPPORT THIS

In Ireland, calls to include vitamin D as part of a national strategy to tackle COVID-19 continue to gain momentum as people await vaccination. Health experts have pushed Ireland's government to act on recent evidence showing the benefits of vitamin D for immunity....

HOW DOES VITAMIN D SUPPORT IMMUNITY?

So why is vitamin D such a hot topic in these COVID-dominated times? There is plenty of evidence out there which highlights the beneficial role vitamin D can play in supporting and strengthening our body's immune response. This evidence takes on an even greater importance during a crisis which has left us all fearing for our own health and the health of our loved ones.

Vitamin D is key to the proper functioning of your immune system, which is your body's first line of defence against infection and disease. With both anti-inflammatory and immunoregulatory properties, vitamin D plays a crucial role in promoting immune response and is vital for the activation of immune system defences....

This has made vitamin D a key talking point during the COVID-19 pandemic, as studies have highlighted it as a way to potentially stave off some of the more serious symptoms of the virus.

A recent study looked at the impact of vitamin D levels on 235 hospital patients with COVID-19. In patients older than 40, those with adequate levels of vitamin D were 51.5% less likely to have adverse outcomes like hypoxia, unconsciousness and even death....

Meanwhile, a review of more than 11,000 people from 14 countries found that supplementing with vitamin D reduced your chances of developing an acute respiratory infection (ARI) by 12%....

COMBINING SEAWEED AND VITAMIN D

Doctor Seaweed's Weed & Wonderful Immunity+ capsules provide an easy way to get your daily dose of vitamin D, while also providing the health benefits of seaweed and vitamin B12....

DISCOVER DOCTOR SEAWEED'S WEED & WONDERFUL® IMMUNITY+ SEAWEED CAPSULES FOR YOURSELF TODAY BY **[CLICKING HERE](#)**. YOU CAN ALSO SUBSCRIBE TO SAVE 15% ON EVERY ORDER!"

- In a January 27, 2021 blog post titled “SEAWEED IS FIGHTING BACK FOR OUR IMMUNITY” at <https://www.weedandwonderful.co.uk/blogs/news/seaweed-is-fighting-back-against-the-2020-immunity-crisis>, you state:

“... The COVID-19 pandemic has turned every aspect of society on its head, and it’s still ongoing. The threat the virus poses to our health has led to an even greater push to stay fit and healthy, as we wait for the vaccine to be rolled out across the country.

Particular focus has been placed on our immune systems, with researchers exploring various options in search of lifestyle changes that can give our immunity the boost it needs during this time. And because of this, a spotlight has been shone on seaweed....

SEAWEED AND YOUR IMMUNITY

Several studies have been undertaken to explore whether there is any link between seaweed and supporting your health against COVID-19. Swansea University recently undertook research into a cost-effective nasal product from Boots: the Dual Defence Nasal Spray, to see if it could help protect against COVID-19 infection.... Although the results aren’t scheduled to be published until March, the reason this spray was chosen for the study was because it contains seaweed as a key ingredient.

Another study, titled ‘The COVID-19 novel coronavirus pandemic 2020: seaweeds to the rescue?’ was also carried out last year and published in the *Journal of Applied Phycology*. As the title suggests, the study explored the connection between seaweed and immunity support in the wake of the pandemic. It concluded that many species of seaweed “contain significant quantities of complex structural sulphated polysaccharides” which have been shown to “inhibit the replication of enveloped viruses.”...

What’s more, a study by the Rensselaer Polytechnic Institute found that seaweed extracts were more effective in blocking the COVID-19 virus than remdesivir: the standard antiviral used to combat the disease at the time....

Along with seaweed, key vitamins like vitamin D and vitamin B12 have been under the spotlight in recent months for their potential role in boosting our immune systems. In fact, last year it was reported that more than 2.5 million vulnerable people in England would be receiving a free supply of vitamin D in order to boost their immune system against the virus....

Doctor Seaweed’s Weed & Wonderful Immunity+ supplements bring all the benefits of seaweed, vitamin D3 and vitamin B12 together in a single capsule, creating a simple way for you to support your immunity and overall wellness on a daily basis.

DISCOVER DOCTOR SEAWEED'S WEED & WONDERFUL™ IMMUNITY+ SUPPLEMENTS FOR YOURSELF TODAY, AND START SUPPORTING YOUR WELLBEING WITH THE POWER OF SEAWEED.”

- In a January 8, 2021 post titled “How does seaweed help to prevent COVID-19?” at <https://www.seaweedandco.com/can-seaweed-prevent-covid19/>, you state:

“COVID-19 and seaweed

In a time of significant health crisis, this study has highlighted the importance of seaweed for supporting our wellbeing. A new study published in *Cell Discovery* has explored a potential link between seaweed extracts and preventing the COVID-19 infection. . .

Understandably, the chaos caused by the crisis has left us all desperate for a solution. As we wait for the COVID-19 vaccine to be rolled out to the masses, studies have explored potential in other areas, including in seaweed.

What was the study?

The study was conducted by the Rensselaer Polytechnic Institute in the US, and was published in *Cell Discovery* over the summer. The aim of the study was to compare the results of seaweed extracts in blocking the COVID-19 virus to the results gained by the leading standard antiviral used to combat the disease at the time: remdesivir.

What did the study find?

Results from the study showed that an extract from edible seaweed was able to outperform remdesivir *in vitro* as an antiviral agent against SARS-CoV-2. This is the virus which causes COVID-19....

Further research into seaweed and COVID-19

This study from the Rensselaer Polytechnic Institute offered vital insight into the potential of seaweed when it comes to the virus and our wider health, but it isn't the only piece of contemporary research which has explored links between seaweed and COVID-19.

A study published in the *Journal of Applied Psychology* asked the question: ‘The COVID-19 novel coronavirus pandemic: seaweed to the rescue?’ In it, researchers explored the link between various species of seaweed and their potential in boosting our immunity, concluding that ‘*many species of marine algae contain significant quantities of complex structural sulphated polysaccharides that have been shown to*

inhibit the replication of enveloped viruses. ' In other words, seaweed was able to stop the virus reproducing.

If you're looking to find an easy way to incorporate seaweed into your products, Seaweed & Co.'s organic, DNA authenticated seaweed powders are the finest source of this versatile and healthy ingredient.

Explore our PureSea™ range of products today by [clicking here](#)."

- In a November 18, 2020 blog post titled "CAN YOU TREAT COVID-19 WITH VITAMIN D?" at <https://www.weedandwonderful.co.uk/blogs/news/can-you-treat-covid-19-with-vitamin-d>, you state:

"INITIAL RESEARCH SHOWS ORAL APPLICATION OF VITAMIN D3 REDUCED COVID-19 ICU ADMISSION FROM 50% TO 2%

There's been no shortage of conversation about preventative measures, precautions, treatments and vaccines since COVID-19 landed in the UK at the start of 2020. And while it is important to remain cautious around the potential for any solution to the pandemic, the intense research into this disease and possible treatments has yielded some encouraging results. Vitamin D therapy trials have proven themselves to be among the most effective in supporting our overall immunity.

In fact, a recent study has presented the first clinical evidence for the use of vitamin D to treat COVID-19. Conducted by Spanish researchers, the study was published in *The Journal of Steroid Biochemistry and Molecular Biology* on 29th August 2020.

The study, entitled 'Effect of Calcifediol Treatment and best Available Therapy versus best Available Therapy on Intensive Care Unit Admission and Mortality Among Patients Hospitalised for COVID-19: A Pilot Randomised Clinical study', is called a pilot because the sample size is small. However, the randomisation and prospective design still make it worthy research.

WHAT DID THE STUDY FIND?

During the study, researchers randomly allocated 76 cases of COVID-19 into oral calcifediol or no-calcifediol control groups (50 and 26 patients respectively) on the day of hospital admission. Oral calcifediol was given at a high dose (0.532mg) on the first day, and then at a half dose (0.266mg) on the third and seventh day, and then weekly until discharge or ICU admission.

To clarify, calcifediol is another name for vitamin D3: the main metabolite of vitamin D. All patients in the study also received the best available standard care at that time, which was hydroxychloroquine plus azithromycin....

Results showed that 13 out of 26 patients – or 50% – in the control group were admitted to ICU, and two ultimately lost their lives. Comparatively, only one out of 50 – or 2% – of the patients receiving vitamin D3 required ICU admission, and there were no fatalities. This indicated a 93% reduction in the odds of needing ICU admission.

FACTORS TO BEAR IN MIND

As with any scientific study, there are a number of factors to consider when looking at these results. Firstly, all patients received standard care, so it is unclear whether calcifediol alone would improve the outcome of a COVID-19 diagnosis. Also, calcifediol is a medical drug used to treat parathyroid problems, so it also cannot be assumed that normal vitamin D supplementation would achieve the same benefits.

The sample size involved in the study is also small, but this was something addressed by the British Medical Journal in a featured letter:

‘Although this was a small trial, the ICU results are so dramatic that they are statistically highly significant.’

HOW DOES VITAMIN D3 HELP FIGHT COVID-19?...

We now know that, from a mechanistic standpoint, both vitamin D3 and COVID-19 target similar physiological systems: namely the renin-angiotensin system (RAS) and the immune system.

The RAS regulates blood pressure and fluid volume, and breaks down bradykinin. One leading theory about COVID-19 is that it kills by dysregulating the RAS via its interaction with the ACE2 receptor....

Vitamin D is one of few nutrients that regulates the RAS and prevents bradykinin accumulation. It also helps to keep inflammation levels down while supporting functions of B-cells and T-cells, both of which are essential in fighting infections. And vitamin D3 is particularly important to our health, especially when compared to vitamin D2. Research has shown that our bodies use and absorb vitamin D3 significantly more effectively....

WHERE CAN YOU GET VITAMIN D?

Vitamin D is, in theory, one of the most accessible vitamins as it can be gained simply via exposure to direct sunlight. However, through the winter months and particularly for people who work in doors or in cold climates, and as you get older, it can be important to seek vitamin D from other sources. Oily fish, red meat, liver and egg yolks all contain this crucial nutrient, but plant-based sources can be difficult to

find. Doctor Seaweed's new Weed & Wonderful® Immunity+ supplements address this issue, containing both vitamin D3 and vitamin B12. In fact, every natural and vegan capsule contains 200% of your RDA of vitamin [D]....

[Click here](#) to find out more about Doctor Seaweed's Weed & Wonderful® Immunity+ seaweed capsules."

- In a Facebook post on January 27, 2021, you state:

"The threat the COVID 19 virus poses to our health has led to an even greater push to stay fit and healthy, as we wait for the vaccine to be rolled out across the country.

Particular focus has been placed on our immune systems, with researchers exploring various options in search of lifestyle changes that can give our immunity the boost it needs during this time.

And because of this, a spotlight has been shone on seaweed, find out more over on our blog!" The post links to a page on your website at <https://www.weedandwonderful.co.uk/blogs/news/seaweed-is-fighting-back-against-the-2020-immunity-crisis> described above.

- In a Twitter post on January 21, 2021, you retweet a post from @SeafoodHeadline that states:

"How does Seaweed help to prevent COVID-19? [link to a page on your website at <https://www.seaweedandco.com/can-seaweed-prevent-covid19/>, described above] #Seaweed #COVID19 #Prevention @DoctorSeaweed"

- In a Facebook post on December 9, 2020 you state:

"Have you seen our most popular blog posts? Read here

Can you treat COVID-19 with Vitamin D?: <https://bit.ly/35JR5Mi>" [shortened URL links to a page on your website at <https://www.weedandwonderful.co.uk/blogs/news/can-you-treat-covid-19-with-vitamin-d>, described above]

A Twitter post on December 9, 2020 contains a link to the same page and substantially similar text.

- In a Facebook post on November 25, 2020, which includes an image of a message board with the text "NOT TODAY #COVID 19," you state:

“ON THE BLOG | Initial research shows oral application of vitamin D3 reduced COVID-19 ICU admission from 50% to 2%,
Find out more <https://bit.ly/35JR5Mi>” [shortened URL links to a page on your website at <https://www.weedandwonderful.co.uk/blogs/news/can-you-treat-covid-19-with-vitamin-d>, described above]

Twitter and Instagram posts on November 25, 2020 contain links to the same page and substantially similar text. The Instagram post includes the hashtag #covid.

- In a Twitter post on September 20, 2020 you state:

“STOCK UP ON #SEAWEED is what @DrMichaelMosley recommends in his new book ‘Covid-19’, where he explains what will help you get in the best shape to fight the virus. Read here to find out more: <http://ow.ly/tPIE50zZGVI>” [shortened URL links to an article titled “Fighting off disease? It’s gut instinct: Dr MICHAEL MOSLEY’s guide to helping you fight back against coronavirus” at <https://www.dailymail.co.uk/health/article-8378505/Dr-MICHAEL-MOSLEYS-guide-helping-fight-against-coronavirus.html>]

Twitter posts on September 11, September 4, August 26, August 10, July 23, July 16, July 8, July 1, June 23, June 15, and June 8, 2020, and a Facebook post on June 8, 2020 contain links to the same article and substantially similar text.

- In a Twitter post on September 19, 2020 you state:

“In a test of antiviral effectiveness against the virus that causes COVID-19, an extract from edible #seaweeds substantially outperformed remdesivir, the current standard antiviral used to combat the disease. Read more <http://ow.ly/v1HV50AII5k>” [shortened URL links to article titled “In cell studies, seaweed extract outperforms remdesivir in blocking COVID-19 virus” at [https://www.sciencedaily.com/releases/2007/200724104228.htm](https://www.sciencedaily.com/releases/2020/07/200724104228.htm)]

Twitter posts on September 3, August 25, August 6, and July 31, 2020 contain links to the same article and substantially similar text.

- In a Twitter post on August 21, 2020 you state:

“#Seaweed To The Rescue, From Renewable Energy To COVID-19 Treatment.’ Herb Seaweed is much more than just a food and it’s [sic] uses are endless! Read more here <http://ow.ly/FfWk50AIXkK>” [shortened URL links to an article at <https://cleantechnica.com/2020/07/25/seaweed-to-the-rescue-from-renewable-energy-to-covid-19-treatment/>]

That article states: “. . . new research from Rensselaer Polytechnic Institute in New York does indicate that an extract from seaweed could “substantially” outperform the current go-to COVID-19 treatment, remdesavir. . .”

Twitter posts on August 14, August 8, August 7, and August 1, 2020 contain links to the same article and substantially similar text.

- In a Twitter post on July 15, 2020 you retweet a post from @WiolineA that states:

“Oral preparations of #iodine complexes are being explored by scientists in laboratory conditions to fight #Covid19.

Iodine has proven #antimicrobial properties and its use in inactivation of other #viruses has already been demonstrated. <https://bit.ly/2O1IGKv> [shortened URL links to an article titled “An *in vitro* assessment of anti-SARS-CoV-2 activity of oral preparations of iodine complexes” at [https://www.biorxiv.org/content/10.1101/2020.06.29.171173v1.full.](https://www.biorxiv.org/content/10.1101/2020.06.29.171173v1.full)]

That article states: “. . . Kelp is a dried seaweed rich in vitamins, minerals especially iodine where iodine is complexed with other components. . .”

It is unlawful under the FTC Act, 15 U.S.C. § 41 *et seq.*, to advertise that a product can prevent, treat, or cure human disease unless you possess competent and reliable scientific evidence, including, when appropriate, well-controlled human clinical studies, substantiating that the claims are true at the time they are made. For COVID-19, no such study is currently known to exist for the products identified above. Thus, any coronavirus-related prevention or treatment claims regarding such products are not supported by competent and reliable scientific evidence. You must immediately cease making all such claims for products that you advertise, market, sell, or otherwise promote or make available in the United States.

You are also advised to review all other claims for such products and immediately cease making claims that are not supported by competent and reliable scientific evidence.

Violations of the FTC Act may result in legal action seeking a Federal District Court injunction. In addition, pursuant to the COVID-19 Consumer Protection Act, Section 1401, Division FF, of the Consolidated Appropriations Act, 2021, P.L. 116-260, marketers who make deceptive claims about the treatment, cure, prevention, or mitigation of COVID-19 are subject to a civil penalty of up to \$43,792 per violation and may be required to pay refunds to consumers or provide other relief pursuant to Section 19(b) of the FTC Act, 15 U.S.C. § 57b(b).

Within 48 hours, please send a message to Richard Cleland, Assistant Director via electronic mail at rcleland@ftc.gov describing the specific actions you have taken to address the

Seaweed & Co.

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FTC's concerns. If you have any questions regarding compliance with the FTC Act, please contact Richard Cleland at +1-202-326-3088.

Very truly yours,

Serena Viswanathan
Associate Director
Division of Advertising Practices

cc: Facebook, Instagram *via email to* consumerpolicy@fb.com

Twitter *via email to* dc-help@twitter.com