

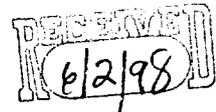
Emerson Ecologics, Inc. • 18 Lomar Park, Pepperell, MA 01463 • 978-433-0090 • 800-654-4432 • Fax 978-433-0099

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Via UPS Next Day Air

May 29, 1998

Dr. Elizabeth Yetley
Office of Special Nutritionals (HFS-450)
Food and Drug Administration
200 C Street, S.W.
Washington, D.C.
20204



**Re: Fulfillment of Reporting Obligation
Under 21 U.S.C.# 343(r) and 21 CFR # 101.93**

Dear Dr. Yetley:

Emerson Ecologics, Inc., in accordance with 21 U.S.C. # 343(r) and 21 CFR # 101.93, hereby submits an original and two copies of its notification within thirty days of first marketing products with the statements presented below. Emerson Ecologics retains scientific documentation supporting the statements.

1. Supplement Brand Name

Pure Evening Primrose Oil from Efamol's Professional Series line

Supplement Ingredients

Pure Evening Primrose oil which contains cis-linoleic acid and gamma linolenic acid

Text of Statements of Nutritional Support

"For helping to maintain peripheral nerve function"

"Efamol Pure Evening Primrose oil helps to maintain peripheral nerve function"

"For helping to maintain smooth and healthy looking-skin"

"Efamol Pure Evening Primrose oil helps to maintain smooth and healthy looking-skin"

"Helps sustain healthy skin"

"Women find it especially effective at helping to maintain consistent hormonal balance throughout the month"

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2. Supplement Brand Name

Omega Combination from Efamol's Professional Series line

Supplement Ingredients

Pure Evening Primrose Oil which contains cis-linoleic acid and gamma linolenic acid

Marine Fish Oil which contains eicosapentaenoic acid and docosahexaenoic acid

Vitamin E

Text of Statements of Nutritional Support

"For maintaining circulation"

"Omega Combination helps maintain healthy circulation"

"For healthy circulation"

"Omega Combination helps maintain active mobility"

"Omega Combination provides a balance of essential fatty acids to help maintain joint mobility and cardiovascular circulation"

"This superior formulation helps to maintain active mobility and healthy circulation"

3. Supplement Brand Name

EFA Calcium from Efamol's Professional Series line

Supplement Ingredients

Evening Primrose Oil

Marine Fish Oil

Calcium Carbonate

Vitamin E

Text of Statements of Nutritional Support

"For stronger bones"

"EFA Calcium helps maintain bone strength"

"EFA Calcium helps the body absorb, deliver and deposit dietary calcium to help maintain bone strength"

4. Supplement Brand Name

Efalex from Efamol's Professional Series line

Supplement Ingredients

Tuna Oil containing docohexaenoic acid

Pure Evening Primrose Oil containing gamma linolenic acid

Thyme Oil

Vitamin E

Text of Statements of Nutritional Support

"For eye and brain function"

"Efalex helps maintain eye and brain function"

"Efalex delivers important fatty acids in the form needed to maintain eye and brain function"

In accordance with 21 USC # 343(r)(6) and 21 CFR # 101.93(c), each of the above statements of nutritional support will be followed by an asterisk that will be cross-referenced to another asterisk on the very same panel or page next to which the following statement will appear in a box in bold face type: **"These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure, or prevent any disease."**

Respectfully submitted,

Joseph A. Emerson, President
Emerson Ecologics, Inc.

1. The address of Emerson Ecologics is 18 Lomar Park, Pepperell, MA 01463