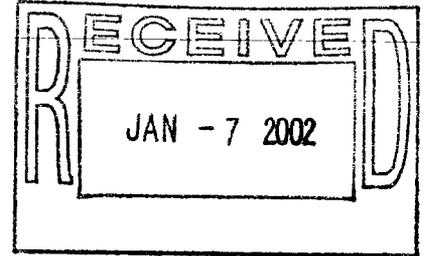


Natural Factors Nutritional Products Inc.

5763 '02 JAN 23 19:30

November 15, 2001

Food and Drug Administration
Office of Special Nutritionals
Center for Food Safety and Applied Nutrition
200 C St. SW
Washington, DC 20204



Dear Sir or Madam:

This is to provide the required information to comply with our obligation under DSHEA labeling regulations.

Supplement: Ester-C®

Manufacturer, packer: Natural Factors Nutritional Products, Ltd.
1550 United Blvd.
Coquitlam, B.C.
Canada V3K 6Y7

Distributor: Natural Factors Nutritional Products, Inc.
1111 80th St. SW, Suite 100
Everett, WA 98203

Text of side Panel: Ester-C® is a patented non-acidic form of Vitamin C. It is produced using an exclusive water-based manufacturing process that yields a Vitamin C that, unlike ordinary ascorbic acid, is gentle on the gastrointestinal system and tooth enamel. The process also gives rise to Vitamin C metabolites, including threonate, that enhance the absorption and utilization of Vitamin C within the body. Each 500mg tablet also contains 100mg of Citrus Bioflavonoids to support the body's use of Vitamin C. Vitamin C is a potent, nutritional antioxidant supporting healthy bones, cartilage, teeth and gums. It helps protect cells against environmental pollutants and deficiencies in the daily diet.*

1111 80th Street S.W., Suite 100
Everett, WA, USA 98203
Phone: (425) 513-8800
Fax: (425) 348-9050

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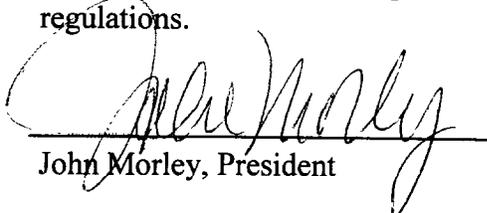
Natural Factors Nutritional Products Inc.

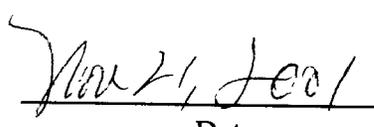
Text of PDP: POTENT ANTIOXIDANT PROTECTION*

Name of dietary ingredient that is the subject of statement: Ester-C® (vitamin C)

Name of dietary supplement: Ester C® 500mg Plus Bioflavonoids

I represent the information presented to be accurate and in compliance with supplement label regulations.


John Morley, President


Date

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