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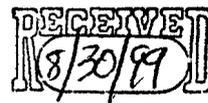


509 Sinclair Lewis Avenue • Sauk Centre, MN 56378 • 320-352-2121

August 23, 1999

1269 '99 SEP -7 P1:44

Robert Moore  
Office of Special Nutritionals (HFS 450)  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
200 c St. SW  
Washington, DC 20204



Dear Sir,

MedLand would like to make notification, that our company is including a "structure and function statement" on our Elk Antler Velvet dietary supplement product; per title 21 Code of Federal Regulations, Part 101.93.

(a)(2)(i) and address of Distributor and Packager:

MedLand  
509 Sinclair Lewis Avenue  
Sauk Centre, MN 56378

(a)(2) • Name and address of Manufacturer:

Velvet Independent Processors, Ltd  
313 2nd Avenue East, P.O. Box 729  
Wilkie, Saskatchewan SOK 4W0

(a)(2)(ii); Text of statement being made:

"antler velvet provides nutritional support for joint structure and function"

(a)(2)(iii); the subject name of ingredient in statement:

Whole Wapiti (North American Elk, Cervus Wapiti) Antler Velvet

(a)(2)(iv) • Name of dietary supplement (including brand name):

AnVel  
Elk Antler Velvet

I, Gary Otte, Senior Executive Vice President, **certify** that the information contained on the AnVel elk antler velvet product label is accurate. I can also provide substantiation that the statement is truthful and not misleading.

Respectfully,

Gary Otte, Senior Executive Vice President

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