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NOV 14 2006

Mr. James P. Gibbons
President
Natural Organics, Inc.
548 Broadhollow Road
Melville, New York 11747

Dear Mr. Gibbons:

This is in response to your letter of October 25, 2006 to the Food and Drug Administration (FDA) pursuant to 21 U.S.C. 343(r)(6) (section 403(r)(6) of the Federal Food, Drug, and Cosmetic Act (the Act)). Your submission states that Natural Organics, Inc. is marketing the product Bright Lightning™ as a dietary supplement.

21 U.S.C. 321(ff) defines the term "dietary supplement." As defined by the Act, a dietary supplement does not include a product represented for use as a conventional food or as a sole item of a meal or the diet. 21 U.S.C. 321(ff)(2)(B). The product identified above appears to be represented for use as a conventional food (e.g., "Naturally Refreshing Energy Drink Mix," "[W]hole food energy drink..."). Therefore, in that it appears to be represented for use as a conventional food (i.e., a drink or beverage), it does not appear to be a dietary supplement within the meaning of 21 U.S.C. 321(ff) and claims made for it are not subject to 21 U.S.C. 343(r)(6).

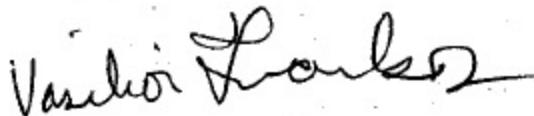
Instead, this product appears to be a conventional food that must meet the regulatory requirements that apply to conventional foods rather than those requirements that apply to dietary supplements. Briefly, it must bear nutrition labeling in accordance with 21 CFR 101.9 and claims may be made for the product in its labeling if they are claims defined by 21 U.S.C. 343(r)(1) or 21 U.S.C. 321(g)(1)(C) that may be made for conventional foods. Additionally, under the Act, any ingredient intentionally added to a conventional food must be used in accordance with a food additive regulation unless it is generally recognized as safe (GRAS) among qualified experts for its intended use in food. A food ingredient that is not GRAS or an approved food additive causes a food to be adulterated under 21 U.S.C. 342(a)(2)(C) and cannot be legally marketed in the U.S. If you intend to market this product as a conventional food and you have any questions about the status of any of its ingredients, you should direct them to FDA's Office of Food Additive Safety (HFS-200), 5100 Paint Branch Parkway, College Park, MD 20740.

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Please contact us if we may be of further assistance.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Vasilios Frankos". The signature is written in a cursive, flowing style.

Vasilios H. Frankos, Ph.D.
Acting Director
Division of Dietary Supplement Programs
Office of Nutritional Products, Labeling
and Dietary Supplements
Center for Food Safety
and Applied Nutrition

Copies:

FDA, Center for Drug Evaluation and Research, Office of Compliance, HFD-310
FDA, Office of the Associate Commissioner for Regulatory Affairs, Office of
Enforcement, HFC-200
FDA, New York District Office, Office of Compliance, HFR-NE140

NATURAL ORGANICS INC.

548 Broadhollow Road, Melville, NY 11747 • Telephone: (631) 293-0030

October 25, 2006

NOV - 6 2006

CERTIFIED MAIL
Return Receipt Requested

Office of Nutritional Products, Labeling and Dietary Supplements
HFS-800
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740-3835

Dear Sir/Madam:

This letter is submitted pursuant to Section 403 (r)(6) of the Federal Food, Drug and Cosmetic Act for the purpose of notifying the agency of statements being made in connection with the marketing of dietary supplements, which are being distributed by this company.

The text of the statement that is being made is as follows:

Nutritional support for Free Radical Defense, Natural Energy Production and Overall Well-Being.

The name(s) of the products are as follows:

Bright Lightning™

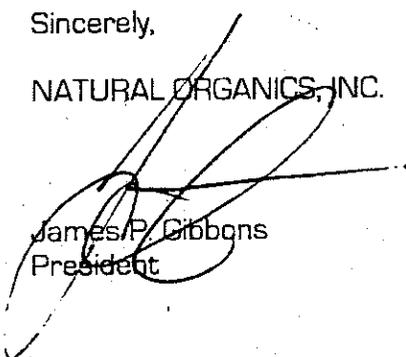
The dietary ingredients for which this statement is being made are:

Proprietary Whole Food Blend

It is certified that the information contained in this notice is complete and accurate and that the firm has substantiation that the statements are truthful and not misleading.

Sincerely,

NATURAL ORGANICS, INC.


James P. Gibbons
President

Accounting Fax:
(631) 249-2248

Administrative Fax:
(631) 293-0349

Customer Service Fax:
(888) 665-0628

Executive Fax:
(631) 293-8520

Graphics Fax:
(631) 249-2022

Human Resources Fax:
(631) 293-8703

Purchasing Fax:
(631) 293-3821

Research and
Development Fax:
(631) 249-7114

Sales Fax:
(631) 293-2934

Nature's Plus
The Energy Supplements

HERBAL ACTIVES

**NATURAL ORGANICS
LABORATORIES INC.**



**Nutritional Support for Free Radical Defense,
Natural Energy Production and
Overall Well-Being.***

Source of Life Bright Lightning™ is the amazing whole food energy drink that energizes, revitalizes, and delivers white food antioxidant protection against free radical damage! Loaded with antioxidants and powerful phytonutrients found nowhere else on Earth, white foods pack a wallop antioxidant punch and may offer targeted nutritional support for cardiovascular function.* Source of Life Bright Lightning is the first whole food energy drink to ever tap into the specialized antioxidant defense that only white foods can offer! With 19 whole food concentrates and extracts, including white tea, white pear and white fig, Source of Life Bright Lightning delivers an incredible total ORAC value of 4000 per serving! Each power-packed Source of Life Bright Lightning serving is enhanced with Activescience™, a patented enzyme activation system that liberates energizing nutrition from foods. Luscious, refreshing peach-pear flavored Source of Life Bright Lightning captures lightning in a bottle, harnessing Nature's awesome power to deliver pure, invigorating energy and unparalleled antioxidant activity!

VEGETARIAN • HYPO-ALLERGENIC

Free from artificial colors and preservatives. Free from the common allergens yeast, wheat, soy and milk.

DIRECTIONS: As a dietary supplement, add two rounded teaspoons of SOURCE OF LIFE BRIGHT LIGHTNING to 8 oz. of water or juice and stir gently. SOURCE OF LIFE BRIGHT LIGHTNING may also be sprinkled on food.

KEEP TIGHTLY CLOSED IN A COOL, DRY PLACE. KEEP OUT OF REACH OF CHILDREN.

*This statement has not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure or prevent any disease.

PRODUCT NO. 30571



Nature's Plus.
The Energy Supplements.

*Guaranteed
Burst of Energy*

Source of Life

**BRIGHT
LIGHTNING**

White Fruit & Vegetable Concentrate
with **White Tea, White Pear & White Fig**

ORAC VALUE
4000

**POWER-PACKED
ANTIOXIDANT**

Supercharged with 19 Whole Foods

Naturally Refreshing Energy Drink Mix
Dietary Supplement • Net Wt. 0.5 lb. (230g)

Supplement Facts

Serving Size 2 Teaspoons (6 grams)
Servings Per Container 38

Amount Per Serving	%DV
Calories	22
Total Carbohydrate	5 g 2%**
Sugars	1 g †

**BRIGHT LIGHTNING PROPRIETARY
WHOLE FOOD BLEND** 6000 mg †

White Nectarine, White Peach, White Fig, Date, Banana, Potato, White Pear (*Pyrus bretschneideri*), White Tea, Jicama (*Pachyrhizus erosus*), Jerusalem Artichoke (*Helianthus tuberosus*), Shiitake Mushroom (*Lentinus edodes mycelia*), Parsnip, Turnip, Cauliflower, Ginger (*Zingiber officinale rhizome*), Kohlrabi (*Brassica oleracea var. gongylodes*), Garlic, Onion, Shallot (*Allium cepa var. aggregatum*), FOS (fructooligosaccharides), Activescience (a patented enzyme activation system - Cellulase, Pectinase, Hemocellulase and Xylanase)

**Percent Daily Values (DV) are based on a 2,000 calorie diet.
† Daily Value not established.

Other ingredients: Natural flavors.

Manufactured with LOVE ♥ for **NATURE'S PLUS**
548 Broadhollow Rd., Melville, NY 11747, USA
Div. of **Natural Organics, Inc.**
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Activescience is a registered trademark of InterActive Enzymes, a division of Trenz Industries, Inc. U.S. Patent Nos. 8,000,844 and 8,130,727.