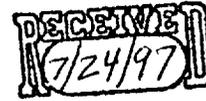




July 15, 1997



Linda S. Kahl, Ph.D.
Office of Special Nutritionals
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 "C" St. S.W. (HFS-450)
Washington, D.C. 20204

0236 '97 SEP 19 P1:53

Dear Dr. Kahl:

Pursuant to Section 6 of the Dietary Supplement Health and Education Act of 1994, NaturaLife Corporation wishes to notify the Food and Drug Administration that it has within the past 30 days, commenced marketing a dietary supplement which bears a statement of nutritional support.

The dietary supplement for which the statement is made is Authentic OPCs. The dietary ingredient that is the subject of the statement is Grape Seed Extract. The statement of nutritional support reads as follows:

"Helps protect cells & tissues from premature aging & the harmful effects of free radicals. NaturaLife's Authentic OPCs contain oligomeric proanthocyanidins (OPCs), one of the most potent antioxidants known, scientifically tested to be more effective in free radical scavenging than vitamin C and vitamin E. OPCs are a distinct class of highly bioavailable flavanol compounds that protect and strengthen collagen, which makes up skin, connective tissue and vascular walls."

This statement is accompanied by the required disclaimer which is prominently displayed in bold-faced type.

This statement of nutritional support is based on data which renders these statements substantiated, truthful and non-misleading.

Sincerely,

NATURALIFE CORPORATION

Gordon M. Walker
Regulatory Counsel

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