



2430 6 APR 10 P1:59

MAR 29 2006

Erin Charron
Quality Control Coordinator
Food Science Corporation
20 New England Drive
Essex Junction, Vermont 05453

Dear Ms. Charron:

This is in response to your letters to the Food and Drug Administration (FDA) dated March 14, 2006 pursuant to 21 U.S.C. 343(r)(6) (section 403(r)(6) of the Federal Food, Drug, and Cosmetic Act (the Act)) for the products Davinci Laboratories of Vermont Hyaluronic Acid, Foodscience of Vermont Hyaluronic Acid, Mountain Naturals of Vermont Hyaluronic Acid, Davinci Laboratories of Vermont Beauty & Brains, Foodscience of Vermont Beauty & Brains, and Mountain Naturals of Vermont Beauty & Brains.

21 CFR 101.93(a)(3) requires that the notice submitted pursuant to 21 U.S.C. 343(r)(6) of this section be signed by a responsible individual who can certify the accuracy of the information presented and contained in the notice, and that the individual certify that the information contained in the notice is complete and accurate, and that the notifying firm has substantiation that the statement is truthful and not misleading. Your submissions do not meet this requirement in that the notices do not contain the signature of the responsible individual designated on the notifications; as such, they do not certify that the firm is in compliance with the requirements of the Act and the regulation. Therefore, your firm has not complied with the notification requirement in 21 U.S.C. 343(r)(6) and must submit notifications in accordance with the requirements in 21 CFR 101.93(a). The failure to submit a valid notice as required by the Act and the agency's regulation may subject the products that are the subject of the notification to regulation under the drug provisions of the Act.

Page 2 - Ms. Erin Charron

Please contact us if we may be of further assistance.

Sincerely yours,



Susan J. Walker, M.D.
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 England District Office, Office of Compliance, HFR-NE240



March 14, 2006

MAR 21 2006

MAR 21 2006

Aims
2006-2276

Food and Drug Administration
Office of Nutritional Products, Labeling and Dietary Supplements
(HFS-810)
Center for Food Safety and Applied Nutrition
5100 Paint Branch Pkwy
College Park, MD 20740

Dear Sir/Madam:

Notice is hereby given pursuant to the requirements of Section 403(b)(6) (21 U.S.C. 343 (b) (6) of the Federal Food, Drug, and Cosmetic Act and in accordance with the requirements of 21 CFR 101.93, that FoodScience Corporation and 20 New England Drive, Essex Junction, VT 05453 within the past 30 days commenced marketing a dietary supplement bearing the following statement(s) on the label and/or in the labeling:

TEXT OF CLAIM(S):

"A Dietary Supplement to Support Joint and Connective Tissue Functions and Skin Health"
"HyaMax™ brand HA, is a low Dalton weight Sodium Hyaluronate for optimal absorption and utilization, which helps to moisturize skin and support connective tissue functions"
"We've added Salvia hispanica and lecithin as synergists to enhance the absorption of Hyaluronic Acid"
"HA supplementation may help to reduce the appearance of age lines around the eyes, face and neck, as well as support joint and muscle comfort"

NAME OF INGREDIENT(S) THAT IS SUBJECT OF CLAIM

Hyaluronic Acid (HyaMax™ brand Sodium Hyaluronate)
Lecithin
Salvia hispanica

NAME OF SUPPLEMENT (INCLUDING BRAND NAME)

Davinci Laboratories of Vermont: Hyaluronic Acid
Foodscience of Vermont: Hyaluronic Acid
Mountain Naturals of Vermont: Hyaluronic Acid

The undersigned certifies that the information contained in this notice is complete and accurate and that FoodScience Corporation has substantiation that the statements are truthful and not misleading.

Sincerely,

Erin Charron
Quality Control Coordinator

A1633

FOODSCIENCE CORPORATION

FOODSCIENCE
OF VERMONT®

U.S. ANIMAL
NUTRITIONALS®
OF VERMONT

VETRI-SCIENCE®
LABORATORIES OF VERMONT

DaVinci Laboratories
OF VERMONT

MOUNTAIN
NATURALS
OF VERMONT

PET NATURALS®
OF VERMONT

March 14, 2006

Food and Drug Administration
Office of Nutritional Products, Labeling and Dietary Supplements
(HFS-810)
Center for Food Safety and Applied Nutrition
5100 Paint Branch Pkwy
College Park, MD 20740

Dear Sir/Madam:

Notice is hereby given pursuant to the requirements of Section 403(b)(6) (21 U.S.C. 343 (b) (6) of the Federal Food, Drug, and Cosmetic Act and in accordance with the requirements of 21 CFR 101.93, that FoodScience Corporation and 20 New England Drive, Essex Junction, VT 05453 within the past 30 days commenced marketing a dietary supplement bearing the following statement(s) on the label and/or in the labeling:

TEXT OF CLAIM(S):

"A Dietary Supplement to Support a Youthful Mind and Body"

"Beauty and Brains™ is an advanced formula designed to support a woman's healthy body and mind throughout the aging process"

"Some of its unique features include: HyaMax™ brand HA, a low Dalton weight Sodium Hyaluronate for optimal absorption and utilization, which helps to moisturize skin and support skin elasticity and joint function"

"A potent ORAC blend provides 1800 ORAC Units daily for powerful antioxidants and immune support while Alpha-GPC, L-Carnosine and phosphatidylserine enhances neurological function"

"Beauty and Brains™ provides ultimate nutritional support inside and out"

NAME OF INGREDIENT(S) THAT IS SUBJECT OF CLAIM

L-Carnosine	Alpha GPC
ORAC Blend	Phosphatidylserine
Vitamin C	Folic acid
Vitamin E (d-alpha)	PABA
Green Tea Extract (70%EGCG)	Choline
Ipriflavone	Inositol
Tremella Powder	Biotin
Grape Seed Extract 95%	Silica
Resveratrol (25%)	Pantothenic acid
Hyaluronic acid (Hyamax)	

NAME OF SUPPLEMENT (INCLUDING BRAND NAME)

Davinci Laboratories of Vermont: Beauty & Brains™
Foodscience of Vermont: Beauty & Brains™
Mountain Naturals of Vermont: Beauty & Brains™

The undersigned certifies that the information contained in this notice is complete and accurate and that FoodScience Corporation has substantiation that the statements are truthful and not misleading.

Sincerely,

Erin Charron
Quality Control Coordinator