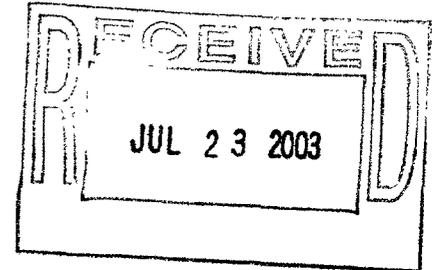


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July 17, 2003

Dr. Robert Moore
Division of Compliance and Enforcement/ONPLDS
Center for Food and Safety and Applied Nutrition
U.S. Food and Drug Administration
HFS - 810
5100 Paint Branch Parkway
College Park, MD 20740



Dear Dr. Moore:

Inverness Medical Nutritionals Group hereby notifies the Food and Drug Administration, that it has started marketing the dietary supplement *Eleuthero 410 mg*. This supplement, which consists of the active ingredient *Eleutherococcus senticosus 410 mg* bears the following structure/function statements on the label(s).

Display Panel (Bottle Label)

For Physical & Mental Health

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.

Side Panel (Bottle Label)

Eleutherococcus senticosus (formerly known as Siberian ginseng) has been used for centuries to help improve mental and physical performance, increasing resistance to stressful conditions. *

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

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Page 1 of 2

We certify that the information contained in this notice is complete and accurate, and we have substantiation that the above structure/function statements are truthful and not misleading.

Sincerely,

A handwritten signature in black ink, appearing to read "William J. Neumann". The signature is fluid and cursive, with a long horizontal stroke at the end.

William J. Neumann
Vice President
Quality and Regulatory Affairs