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July 8, 1996

Regulatory Branch
Division of Programs and Enforcement Policy
Office of Special Nutritionals (HFS-456)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C Street, S.W.
Washington, DC 20204

Attn: Margaret Binzer
Consumer Safety Officer

Re: PEPOGEST™: Statements of Nutritional Support

Ladies/Gentlemen:

Pursuant to Section 6 of the Dietary Supplement Health and Education Act of 1994, 21 U.S.C. § 343(r)(6), this is to notify the Food and Drug Administration that our client Cartilage Technologies, Inc. of Elmsford, New York has within the last 30 days begun marketing its PEPOGEST™ brand dietary supplement containing peppermint and fennel oils, with the following labeling statements that describe the role of these dietary ingredients intended to affect human body structure or function:

"Smooths out gastrointestinal function."

"Peppermint and fennel oils have a natural and spasmodic effect on the gastrointestinal tract. These oils have been used for many years in the treatment of symptoms such as abdominal distress, colic and troublesome manifestations of

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irritability of the bowel. You can now enjoy the proven benefits of these oils in smoothing out gut function by the use of PEPOGEST™. PEPOGEST™ is a delayed release, physician formulated, natural remedy for colic, gas and irritable intestines. In addition, PEPOGEST™ can be used to make a colostomy more acceptable."

"Peppermint and fennel oils may relax the intestines and assist in the relief of distress, colic and flatulence of the gut. These essential oils are carminative with local effects on the bowels. Improves the acceptance of a colostomy."

Sincerely yours,



Charles J. Raubicheck

CJR/jbh
cc: Cartilage Technologies, Inc.