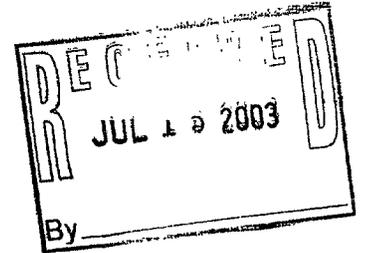


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July 11, 2003

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 *Grape Seed Extract With Whole Grape*. This supplement, which consists of the following active ingredients: Grape Seed Extract (*Vitis vinifera*) (seed) 100 mg, Grape Skin Extract (*Vitis vinifera*) (skin) 37.5 mg, Grape Extract (*Vitis vinifera*) (whole fruit) 12.5 mg bears the following structure/function statements on the label(s).

Display Panel (Bottle Label)

Supports Antioxidant Activity *

Side Panel (Bottle Label)

Grape Seed Extract With Whole Grape has more antioxidant activity than grape seed alone, and is one of the richest sources of proanthocyanidins, antioxidants that may limit damage by free radicals and help to keep artery walls flexible, an important part of circulatory well-being. *

* 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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Hang Tag

Whole Grape Power
Increased Antioxidant Activity *

Grape Seed Extract With Whole Grape harnesses the power of the entire grape, not just the seeds. Grapes are a rich source of polyphenols, which help prevent cell damage caused by free radicals.*

* 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.

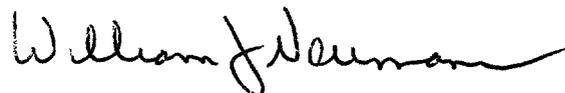
Tray Label

Supports Antioxidant Activity*

*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.

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,



William J. Neumann
Vice President
Quality and Regulatory Affairs