

**COPY**

November 03, 2004

Director  
Special Nutritionals  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
200 C Street S.W.  
Washington, DC 20204

**SENT VIA CERTIFIED MAIL – RETURN RECEIPT REQUESTED**  
**ARTICLE #: 7099 3400 0016 4139 9713**

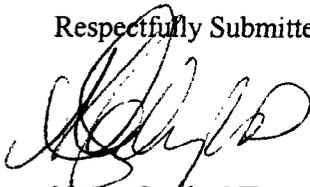
**RE: PINE BARK OPC ANTI-OXIDANTS**

Dear Sir / Madam:

This is a 30-day notification of a statement of nutritional support for a dietary supplement. The product name is **PINE BARK OPC ANTI-OXIDANTS**. The structure / function claims on all sizes and configurations of this product are identical. They are as follows:

The active ingredients in Pine Bark and Grape Seed extracts are known as oligomeric proanthocyanidins (OPC's), which are natural polyphenols that provide powerful anti-oxidant protection to support a wide variety of tissues and organ systems in the body. Studies have shown that OPC's are better free radical scavengers than Vitamin E, and epidemiologic evidence suggests that a diet high in these nutrients may help to support the health and integrity of the heart and cardiovascular system. Pine Bark has been shown to protect the heart and blood vessels from free radical damage and research further demonstrates the efficacy of Pine Bark in also supporting the nervous, immune and ocular (eye) systems.

Respectfully Submitted,



Nancy Steely, ND  
Director of Research & Development

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