

WRITER'S DIRECT ACCESS

June 20, 2002

Jerome H. Heckman
(202) 434-4110
heckman@khlaw.com

Via Facsimile

Dr. Thomas Schwarz
Economos Austria GmbH
A-8750 Judenberg
Gabelhofer Strasse 25
AUSTRIA

Re: FDA Status of H-ECOPUR; Our File No. EC11253

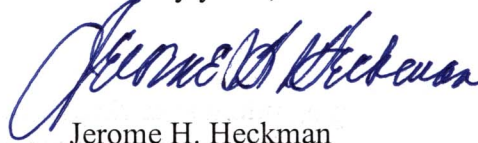
Dear Dr. Schwarz:

The purpose of this letter is to respond to your request for our opinion regarding the status, under the laws and regulations administered by the United States Food and Drug Administration (FDA), of Economos Austria's H-ECOPUR, a thermoplastic polyurethane, intended for use as o-rings or other seals for food processing machinery.

Based on the information provided regarding the composition of H-ECOPUR, and given that each component of H-ECOPUR is cleared by an appropriate food additive regulation, is Generally Recognized as Safe (GRAS), or is not reasonably expected to become a component of food and is therefore not considered a food additive, we have no hesitation in advising that H-ECOPUR may be used as intended in full compliance with the U.S. Federal Food, Drug, and Cosmetic Act and all applicable food additive regulations, including those in Title 21 of the Code of Federal Regulations (21 C.F.R.).

We trust that this letter fully responds to your request for our opinion on the FDA status of H-ECOPUR. Should you have any questions, or if we may be of assistance in any other way, please do not hesitate to contact us.

Cordially yours,



Jerome H. Heckman