

1001 G Street, N.W.
Suite 500 West
Washington, D.C. 20001
tel. 202.434.4100
fax 202.434.4646

May 22, 2008

Writer's Direct Access
Joan Sylvain Baughan
(202) 434-4147
baughan@khlaw.com

Electronic Mail and U.S. Mail

Dr. Graham Chapman
Green Club Inc.
100 Adelaide Street West
Suite 502
Toronto, Ontario M5H 1S3
Canada

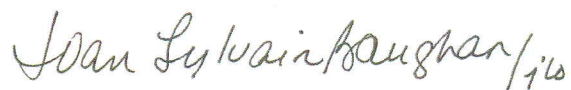
**Re: FDA Status of Addiflex HES Degradable Additive for Use in Food-Handling
Gloves; Our File No. GR13949**

Dear Dr. Chapman:

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 Food and Drug Administration (FDA) of Green Club Inc.'s Addiflex HES for use as a component of food-handling gloves. In this regard, we are enclosing two letters that provide our opinion regarding the suitable status of Addiflex HES for this use. The shorter letter states our conclusion without discussion of the legal and regulatory background underlying our opinion or disclosure of your formulation, while the longer letter includes the detailed basis for our conclusion. We provide both types of letters so that you may use the one that will best satisfy your customers' need for assurance that the use of Addiflex HES in food-handling gloves is in accord with the applicable FDA requirements.

We trust that you will find these letters fully responsive to your request for our opinion. Should you have any further questions regarding this matter, or if we may be of assistance in any other way, please do not hesitate to contact us.

Cordially yours,



Joan Sylvain Baughan