

**DEPARTMENT OF HEALTH AND HUMAN SERVICES**

Minneapolis District Office Central Region

212 Third Avenue South  
Minneapolis, MN 55401  
Telephone: (612) 758-7114  
FAX: (612) 334-4142

June 27, 2006

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Michael Fields  
InterNatural  
P.O. Box 489  
Twin Lakes, Wisconsin 53181

Ref. No. CL-06-HFS-810-230

Dear Mr. Fields:

This is to advise you that the Food and Drug Administration (FDA) has reviewed your web site at the Internet address <http://www.international-alternativehealth.com> and has determined that the products "Nutrition Now's Chewable Echinacea Cold King," "Herbs For Kids' Cherry Bark Blend," and "Rainforest Remedies' Cold Season" are promoted for conditions that cause the products to be drugs under section 201(g) (1) of the Federal Food, Drug, and Cosmetic Act (the Act) [21 U.S.C. § 321(g)(1)]. The therapeutic claims on your web site establish that the products are drugs because they are intended for use in the cure, mitigation, treatment, or prevention of disease. The marketing of these products with these claims violates the Act.

Examples of some of the claims observed on your web site include:

**Nutrition Now's Chewable Echinacea Cold King**

"Nobody has time for a cold. Nutrition Now has an entire line f [sic] cold season supplements to help you feel better fast and speed up recovery."

"Echinacea may...reduce suscetibility [sic] and the length of the cold."

In addition, the name of this product suggests that it is intended for use in the cure, mitigation, treatment, or prevention of disease.

**Herbs For Kids' Cherry Bark Blend**

"One of the early warning signs of a cold or flu is a scratchy or sore throat.... Turn to Herbs for Kids Respiratory support formulas for a good first defense on the onset of a child's symptoms."

"Natural support of the lungs and respiration can be helpful for a child when a cold or cough is present."

Michael Fields  
June 27, 2006

**Rainforest Remedies' Cold Season**

Symptoms: Flu, colds, minor infections, sore throats, sinus congestion. \* \* \*  
Suggested Use: Shake well before using. For flu and colds, one dropper-full in 1/2 glass tepid water or juice, every two hours until symptoms abate. If symptoms persist, increase dosage frequency."  
"May be used topically or internally for...herpes...."

In addition, the name of this product suggests that it is intended for use in the cure, mitigation, treatment, or prevention of disease.

Furthermore, your products are not generally recognized as safe and effective for the above referenced conditions and therefore, the products are also "new drugs" under section 201(p) of the Act [21 U.S.C. § 321(p)]. New drugs may not be legally marketed in the U.S. without prior approval from FDA as described in section 505(a) of the Act [21 U.S.C. § 355(a)]. FDA approves a new drug on the basis of scientific data submitted by a drug sponsor to demonstrate that the drug is safe and effective.

FDA is aware that Internet distributors may not know that the products they offer are regulated as drugs or that these drugs are not in compliance with the law. Many of these products may be legally marketed as dietary supplements if claims about diagnosis, cure, mitigation, treatment, or prevention are removed from the promotional materials and the products otherwise comply with all applicable provisions of the Act and FDA regulations.

Under the Act, as amended by the Dietary Supplement Health and Education Act, dietary supplements may be legally marketed with truthful and non-misleading claims to affect the structure or function of the body (structure/function claims), if certain requirements are met. However, claims that dietary supplements are intended to prevent, diagnose, mitigate, treat, or cure disease (disease claims), excepting health claims authorized for use by FDA, cause the products to be drugs. The intended use of a product may be established through product labels and labeling, catalogs, brochures, audio and videotapes, Internet sites, or other circumstances surrounding the distribution of the product. FDA has published a final rule intended to clarify the distinction between structure/function claims and disease claims. This document is available on the Internet at <http://vm.cfsan.fda.gov/~lrd/fr000106.html>, (codified at 21 C.F.R. § 101.93(g)).

In addition, only products that are intended for ingestion may be lawfully marketed as dietary supplements. Topical products and products intended to enter the body directly through the skin or mucosal tissues, such as transdermal or sublingual products, are not dietary supplements. For these products, both disease and structure/function claims may cause them to be new drugs.

Certain over-the-counter drugs are not new drugs and may be legally marketed without prior approval from FDA. Additional information is available in Title 21 of the Code of Federal Regulations (21 C.F.R.) Parts 310 and 330-358, which contain FDA's regulations on over-the-counter drugs.

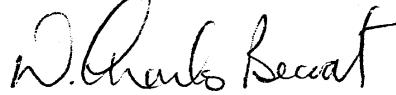
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This letter is not intended to be an all-inclusive review of your web site and products your firm markets. It is your responsibility-to ensure that all products marketed by your firm comply with the Act and its implementing regulations.

If you need additional information or have questions concerning any products distributed through your web site, please contact FDA. You may respond in writing to Tyra S. Wisecup, Compliance Officer, at the address in the letterhead. If you have any questions concerning this letter, please contact Ms. Wisecup at (612) 758-7114.

Sincerely,

A handwritten signature in black ink that reads "W. Charles Becoat". The signature is written in a cursive style with a large, looped initial "W".

W. Charles Becoat  
Director  
Minneapolis District

HTW/ ccl