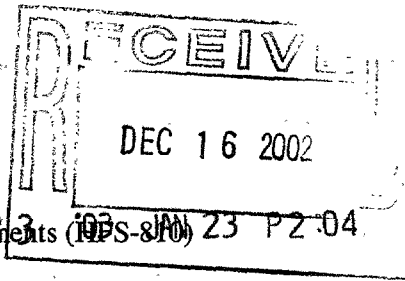


# Botanical LABORATORIES

Science For A Healthier Tomorrow  
December 9, 2002



Office of Nutritional Products, Labeling, and Dietary Supplements (OPS-870) 23 P2 04  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
5100 Paint Branch Parkway  
College Park, MD 20740-3825

Dear Sir or Madam,

This notification is on behalf of ZAND® Herbal Formulas and their Parent company Botanical Laboratories, Inc., 1441 West Smith Road, Ferndale, WA 98248.

We intend to include the following statements of nutritional support based on substantiation data supporting the use of Echinacea root on the following products.

Ingredient: Echinacea

Statement: Supports a healthy immune system

Products: Echinacea C® 1000 60 tablets  
Echinacea root 2 oz  
Echinacea root 1 oz  
Standardized Echinacea root 1 oz  
Standardized Echinacea and Goldenseal root 1 oz  
Standardized Echinacea and Goldenseal root 50 cap  
Standardized Echinacea and Goldenseal root 90 cap

Statement: Supports the immune system

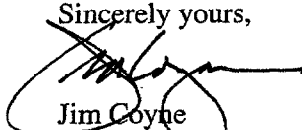
Products: Kids Insure Herbal® 1 oz Raspberry flavor  
Kids Insure Herbal® 1 oz Orange Banana flavor

Statement: Immune support

Product: Echinacea PM® Syrup 4 oz

Please be advised that the information contained herein is, to the best of our knowledge and information, accurate. Our firm has information substantiating that the above statement is truthful and not misleading.

Sincerely yours,

  
Jim Coyne  
President/CEO  
ZAND® Herbal formulas  
Botanical Laboratories, Inc.

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