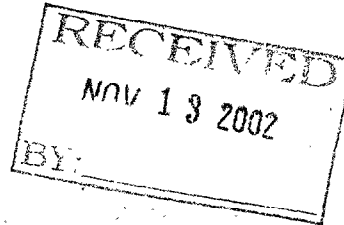


0197 02 NOV 25 P1:57

October 25, 2002



The Office of Special Nutritionals (HFS-450)  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
5100 Paint Branch Pkwy  
College Park, MD 20740

Dear Sir/Madam:

This is a notification pursuant to 21 U.S.C. 343(r)(6) that Standard Process Inc., Palmyra, Wisconsin 53156-0904, is making the following statements:

- (1) The Vitamin P complex, consisting of the bioflavonoid quercetin, helps promote proper absorption and use of the Vitamin C complex and helps maintain capillary and connective tissue health.
- (2) Echinacea stimulates circulation, liver function, endocrine function, and respiration.

These statements are made for a dietary supplement containing echinacea root powder, acerola powder, rose hip powder, vacuum dried buckwheat juice and seed, honey, and calcium stearate. The name of the product is Echinacea-C™.

The information contained herein is accurate and Standard Process Inc. has substantiation that the statements are truthful and not misleading.

Sincerely yours,



Ann Holden  
Standard Process Inc.

97S 0162

LET

11186

82508

