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November 15, 1998



The Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C. Street S.W.
Washington, DC 20204

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) Standard Process offers many products that will help support your immune system from the stresses of modern life and the changing seasons.*
- (2) Echinacea supports the immune system by enhancing the ability of various types of white blood cells to engulf microscopic invaders. Vitamin C is well known for its role in maintaining strong immune function and is an important anti-oxidant.*

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.



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