

Botanical
LABORATORIES
Consumer Products Division

0101 5 APR 2005

February 4, 2005

Office of Nutritional Products, Labeling and Dietary Supplements (HFS-810)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740-3825

FEB 16

Dear Sir or Madam,

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

We intend to include the following statements of nutritional support based on substantiated data for the use of Echinacea on the following product.

Ingredient: Echinacea

Statements: Immune Support
Supports a healthy immune system
Supports the immune system
Increased immune support

Product: Insure Immune Support
Organic Insure Immune Support
Echinacea Root Extract
Standardized Echinacea Root
Standardized Echinacea & Goldenseal Root
Kids Insure Herbal
Echinacea PM
HerbalMist Throat Spray

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

Sincerely yours,



Kevin H. Cobb
Director of Marketing
ZAND® Herbal Formulas
Botanical Laboratories, Inc.

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ZAND

HERBS for KIDS.

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Also see docket 975-0163