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MAR 14 2006

Mr. John Morley
President
Natural Factors Nutritional Products, Inc.
1111 80th Street S.W.
Suite 100
Everett, Washington 98203

Dear Mr. Morley:

This is in response to your letter of February 7, 2006 to the Food and Drug Administration (FDA) pursuant to 21 U.S.C. 343(r)(6) (section 403(r)(6) of the Federal Food, Drug, and Cosmetic Act (the Act)). Your submission states that Natural Factors Nutritional Products, Inc. is making the following claims for the product **Parasite Formula with Oregano Oil Extract**:

“Natural Factors Parasite Formula is an effective anti-parasitic formula....”
“Anti-Parasitic.”

21 U.S.C. 343(r)(6) makes clear that a statement included in labeling under the authority of that section may not claim to diagnose, mitigate, treat, cure, or prevent a specific disease or class of diseases. The statements that you are making for this product suggests that it is intended to treat, prevent, or mitigate disease. These claims do not meet the requirements of 21 U.S.C. 343(r)(6). These claims suggest that this product is intended for use as a drug within the meaning of 21 U.S.C. 321(g)(1)(B), and that it is subject to regulation under the drug provisions of the Act. If you intend to make claims of this nature, you should contact FDA's Center for Drug Evaluation and Research (CDER), Office of Compliance, HFD-310, Montrose Metro II, 11919 Rockville Pike, Rockville, Maryland 20852.

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Please contact us if we may be of further assistance.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'S. Walker', with a long horizontal line extending to the right.

Susan J. Walker, M.D.
Director
Division of Dietary Supplement Programs
Office of Nutritional Products, Labeling
and Dietary Supplements
Center for Food Safety
and Applied Nutrition

Copies:

FDA, Center for Drug Evaluation and Research, Office of Compliance, HFD-310
FDA, Office of the Associate Commissioner for Regulatory Affairs, Office of
Enforcement, HFC-200
FDA, Seattle District Office, Office of Compliance, HFR-PA340

Natural Factors Nutritional Products Inc.

February 7, 2006

Food and Drug Administration
Office of Special Nutritionals
Center for Food Safety and Applied Nutrition
200 C Street SW
Washington, DC 20204

MAR - 8 2006

Dear Sir or Madam:

This is to provide the required information to comply with our obligation under DSHEA labeling regulations.

Supplement: Parasite Formula with Oregano Oil Extract

Manufacturer, packer: Natural Factors Nutritional Products, Ltd.
3655 Bonneville Place
Burnaby, B.C.
Canada V3N 4S9

Distributor: Natural Factors Nutritional Products, Inc.
1111 80th Street SW, Suite 100
Everett, WA 98203

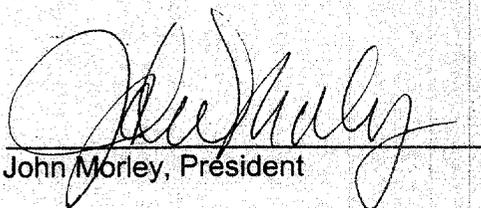
Text of Side Panel: Natural Factors Parasite Formula is an effective anti-parasitic formula in convenient capsule form.

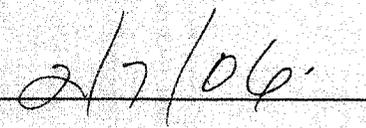
Text on PDP: Anti-Parasitic

Name of dietary ingredient that is the subject of statement: Barberry (*Berberis arislata*, *Gentian* (*Gentiana lutea*) extract, Grapefruit (*Citrus paradisi*) extract, Oregano (*Origanum vulgare* L.) extract, Wormwood (*Artemisia absinthium* L.) extract, Quassia (*Picrasma excelsa*) extract, Cloves (*Syzgium aromaticum*) extract.

Name of the dietary supplement: Natural Factors

I represent the information presented to be accurate and in compliance with supplement label regulations.


John Morley, President


Date

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Everett, WA 98203
Phone: (425) 513-8800
Fax: (425) 348-9050

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