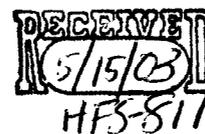


Veterinary Botanical Medicine Association
334 Knollwood Lane-
Woodstock, GA 30188

Dr Sharon Benz
Nutrition & Labeling Team
Center for Veterinary Medicine
Food and Drug Administration
7500 Standish Place, HFV - 228
Rockville, MD 20855



Dear Dr. Benz

The problems related to the use of Ephedra intoxication are increasing because this botanical is used inappropriately as an 'appetite suppressant' and 'energy enhancer'. When it is mixed with other stimulants such as caffeine, guarana, yerba mate' and yohimbe, the potential dangers increase. Unfortunately, people and animals with high blood pressure, heart disease, and other health problems can be harmed by improper use of this herb. Long term use in healthy people and animals can lead to general weakness, high blood pressure, stroke, and heart disease.

In Oriental medicine, Ephedra sinensis, and in Western medicine Ephedra americana or E. intermedia (Mormon Tea) have been used successfully for 2000 years to treat the early stages of flu, bronchitis, asthma and pneumonia, and also as a diuretic to treat edema, or as a diaphoretic to induce sweating and "break" a fever. It is indicated for short term use only.

The Veterinary Botanical Medical Association supports improved **labeling** standards and control of OTC (over-the-counter) sales. We object to **the use of** ephedra in diet reduction pills and powders, and as a "natural stimulant". **These** are clinical uses not validated as safe or effective by traditional medicine. Uneducated consumers or practitioners unschooled in herbal medicine significantly reduce the safety of this herb by using it in novel ways before appropriate testing has been accomplished.

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VBMA does not support a total ban on sales of this herb. Every systematic review that has examined adverse events - including the recent RAND report, the General Accounting Office, and a Congressional Oversight Committee - indicates that there was little or no validity in the reports - the data were insufficient to make a correlation regarding causation.

How many adverse events occurred in people using ephedra by prescription from traditionally trained herbalists? In qualified hands, this is a very useful herb and should NOT be banned for use by certified herbalists or licensed veterinarians, physicians, naturopathic doctors, and acupuncturists in possession of intensive training in herbal medicine.

The VBMA is available to assist the FDA to help stop the OTC abuse of this herb. Please call us for any information you may need, and visit our website at: www.vbma.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Ihor Basko". The signature is fluid and cursive, with a large initial "I" and a long, sweeping underline.

Ihor Basko, DVM

President

Veterinary Botanical Medical Association

drbwavevet@hawaiiink.net