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JUN 17 2002

Ms. Laura Quintano
Senior Counsel
Avon Products, Inc.
1251 Avenue of the Americas
New York, New York 10020-1196

Dear Ms. Quintano:

This is in response to your letter of May 21, 2002 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 Avon Products, Inc. is making the following claims for the product **VitAdvance Cold Season**:

“...supports your body’s natural defenses against colds and flu”

“...support the body’s natural resistance during cold and flu season.”

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, along with the name of the product (i.e., VitAdvance Cold Season), suggest that it is intended to treat, prevent, cure, or mitigate a disease, namely the common cold. 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, 7520 Standish Place, Rockville, Maryland 20855.

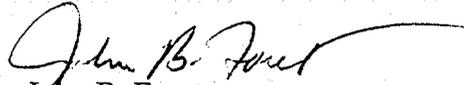
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Please contact us if we may be of further assistance.

Sincerely,



John B. Foret

Director

Division of Compliance and Enforcement

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-300

FDA, Office of the Associate Commissioner for Regulatory Affairs, Office of
Enforcement, HFC-200

FDA, New York District Office, Office of Compliance, HFR-NE140

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BY:



AVON PRODUCTS, INC.
1251 AVENUE OF THE AMERICAS
NEW YORK, NY 10020-1196
212.282.7000 TEL

May 21, 2002

Office of Nutritional Products,
Labeling and Dietary Supplements (HFS-810)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C St., SW
Washington, DC 20204

Re: Dietary Supplement Notification; 21 CFR § 101.93

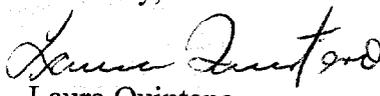
Dear Sir or Madam:

Pursuant to Section 403(r)(6) of the Federal Food, Drug, and Cosmetic Act and Food and Drug Administration regulation 21 CFR § 101.93, this letter is submitted by Avon Products, Inc. as notification to FDA of the below statements made on the labeling of the following dietary supplement product:

Product Name: VitAdvance Cold Season

- Statements:
- With Vitamin C, Echinacea and Zinc, supports your body's natural defenses against colds and flu
 - Echinacea purpurea (purple coneflower) to help maintain the body's natural immune system
 - Zinc and Vitamin C to help support the body's natural resistance during cold and flu season

The undersigned certifies that the information contained in this notice is complete and accurate and that Avon Products, Inc. has substantiation that the statements are truthful and not misleading.

Sincerely,

Laura Quintano
Senior Counsel

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