



5709 '03 AUG 29 P2 AUG 15 2003

August 7, 2003

Mr. Robert Moore
Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 811
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

RE: Label Claims/Disclaimers

Dear Mr. Moore:

This letter is to notify you that PhytoPharmica, (a Division of Integrative Therapeutics, Inc.) at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a distributor and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the labels of the following product. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
PhytoPharmica (a Division of Integrative Therapeutics, Inc.)	Glucosamine Sulfate and Chondroitin	Chloride, Sodium, Glucosamine Sulfate, Chondroitin Sulfate	In vitro, a combination of GS and CS synergistically stimulated GAG synthesis.* This stimulating effect is greater than when GS or CS is used alone.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica, (a Division of Integrative Therapeutics, Inc.) has substantiation that the statements are truthful and not misleading.

By: Robert C. Doster
Robert C. Doster
Title: Senior Vice President of Scientific Affairs

Date: 8/7/03

If you have any questions, please contact Robert Doster, Senior Vice President Scientific Affairs, at (920) 406-3608.

Sincerely,

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Michael P. Devereux
Michael P. Devereux
Chief Financial Officer
Glucosamine Sulfate and Chondroitin 32p

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