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RECEIVED
JUN 18 2003
By _____

June 3, 2003

Division of Standards and Labeling Regulations
Office of Nutritional Products, Labeling, and Dietary Supplements (HFS-820)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD, 20740-3835

To Whom it May Concern:

Biopolymer Engineering, Inc. would like to update the structure function claims for its dietary supplements containing WGP Beta Glucan™.

Manufacturer: Biopolymer Engineering, Inc.
3388 Mike Collins Drive
Eagan, Minnesota 55121

Label Claim: "The immune system is a combination of defenses that protect the body from foreign challenges. The body depends upon an effective immune system for survival. Imucell WGP is a dietary supplement that may enhance the strength of certain key immune cells called macrophage cells, a type of white blood cell that is the body's first-line defense."

Dietary Supplement: Imucell WGP contains patented Whole Glucan Particles (WGP) of beta 1,3/1,6 glucan extracted from food-grade Baker's yeast (*Saccharomyces cerevisiae*), a FDA-approved food ingredient (21CFR170.30).

Brand Names: Imucell WGP™
Life Source Basics™
Beta Right™
Science Basics™

Attachment: Imucell WGP label

Sincerely,

Richard Mueller
President and Chief Executive Officer
Biopolymer Engineering, Inc.

84759

NO INK OR COAT



Suggested Use: Take one capsule per day on an empty stomach or as otherwise recommended by a healthcare professional.

Supplement Facts	
Serving Size: 1 Capsule	
Servings Per Container: 30 Capsules	
Amount per serving:	
WGP™ Beta Glucan (Naturally derived from <i>Saccharomyces cerevisiae</i>)	250mg†
† Daily Value not established.	
Other Ingredients: Microcrystalline cellulose, gelatin, water.	

IMPORTANT: This product contains yeast. Do not use if you have a known or suspected allergy to yeast, yeast (Saccharomyces cerevisiae), or any other ingredient. Consult your healthcare provider before taking this product. Keep out of the reach of children. For more information, visit www.imucell.com.

The immune system is a combination of defenses that protects the human body from foreign challenges. The body depends on an efficient immune system for survival. Imucell WGP™ is a dietary supplement that may enhance the strength of certain key immune cells called macrophages, a type of white blood cell that is the body's frontline defense.

Imucell WGP™ contains WGP™ (Whole Glucan Particle Beta Glucan), a patented natural beta-glucan extracted and purified from the cell walls of baker's yeast.

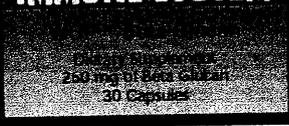
***THIS STATEMENT HAS NOT BEEN EVALUATED BY THE FOOD AND DRUG ADMINISTRATION. THIS PRODUCT IS NOT INTENDED TO DIAGNOSE, TREAT, CURE OR PREVENT ANY DISEASE.**



imucell
WGP™



STRENGTHEN YOUR IMMUNE SYSTEM



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Our immune system works hard to keep us healthy by fighting off harmful invaders. But sometimes your body's defenses aren't strong enough to keep you healthy. That's where Imucell WGP™ comes in. This natural beta-glucan supplement may help strengthen your immune system's defenses.

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Imucell WGP™ is manufactured by Bio-Pharmaceuticals, Inc., 10000 West 16th Street, Englewood, Colorado 80150.

For more information, visit www.imucell.com.

