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825 Challenger Drive, Green Bay, WI 54311-8328  
P: 920.469.1313 ◊ F: 888.570.6460 (Enzymatic)  
P: 920.469.9099 ◊ F: 920.469.4418 (Phyto)

November 15, 2004

Office of Nutritional Products, Labeling &  
Dietary Supplements, HFS 810  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
5100 Paint Branch Parkway  
College Park, MD 20740

NOV 23 2004

RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. 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.

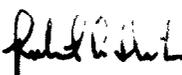
PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	Grasses, vegetables, and fiber for overall nutritional support.*	Inulin from Chicory root, Guar Gum Seed Extract, Barley Grass, Alfalfa Sprouts, Broccoli Sprouts, Radish Sprouts, Oat Grass, Wheat Grass, Alfalfa Juice Concentrate, European Elder Berry Extract, Broccoli Flower, Cabbage Leaf, Carrot Root, Collard Greens, Tomato Fruit, Mustard Greens, Kale Leaf, Spinach Leaf, Green Tea Leaf Extract, Dulse, Blue-Green Algae, Kelp Leaf and Stem, Stevia Leaf Extract

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

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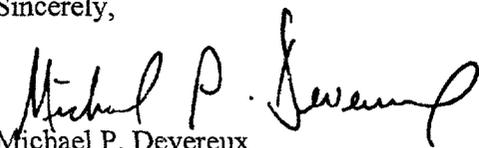
14920

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

Date: 1/15-04

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

Sincerely,

  
Michael P. Devereux  
Chief Financial Officer



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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	Natural detoxification support*	Inulin from Chicory root, Guar Gum Seed Extract, Barley Grass, Alfalfa Sprouts, Broccoli Sprouts, Radish Sprouts, Oat Grass, Wheat Grass, Alfalfa Juice Concentrate, European Elder Berry Extract, Broccoli Flower, Cabbage Leaf, Carrot Root, Collard Greens, Tomato Fruit, Mustard Greens, Kale Leaf, Spinach Leaf, Green Tea Leaf Extract, Dulse, Blue-Green Algae, Kelp Leaf and Stem, Stevia Leaf Extract

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*Robert C. Doster*

By: \_\_\_\_\_

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 11-15-04

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	Alkaline-producing ingredients for acid/base balance*	Inulin from Chicory root, Guar Gum Seed Extract, Barley Grass, Alfalfa Sprouts, Broccoli Sprouts, Radish Sprouts, Oat Grass, Wheat Grass, Alfalfa Juice Concentrate, European Elder Berry Extract, Broccoli Flower, Cabbage Leaf, Carrot Root, Collard Greens, Tomato Fruit, Mustard Greens, Kale Leaf, Spinach Leaf, Green Tea Leaf Extract, Dulse, Blue-Green Algae, Kelp Leaf and Stem, Stevia Leaf Extract

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Title: Senior Vice President of Scientific Affairs

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<b>PRODUCT NAME</b>	<b>STATEMENTS</b>	<b>INGREDIENT(S) TO WHICH THE CLAIM REFERS</b>
Earth's Promise™	The ingredients in Earth's Promise contain vitamins, minerals, and key compounds that have been shown in scientific research to support major body systems.* These foods are also high in antioxidant activity to help reduce the effects of oxidative stress.*	Inulin from Chicory root, Guar Gum Seed Extract, Barley Grass, Alfalfa Sprouts, Broccoli Sprouts, Radish Sprouts, Oat Grass, Wheat Grass, Alfalfa Juice Concentrate, European Elder Berry Extract, Broccoli Flower, Cabbage Leaf, Carrot Root, Collard Greens, Tomato Fruit, Mustard Greens, Kale Leaf, Spinach Leaf, Green Tea Leaf Extract, Dulse, Blue-Green Algae, Kelp Leaf and Stem, Stevia Leaf Extract

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	Young grasses provide much higher nutrient levels than maturing grasses. The barley, oat and wheat grasses in Earth's Promise are organically grown and contain high levels of vitamins, minerals and amino acids. They are also sources of potent antioxidants and essential nutrients.*	Inulin from Chicory root, Guar Gum Seed Extract, Barley Grass, Alfalfa Sprouts, Broccoli Sprouts, Radish Sprouts, Oat Grass, Wheat Grass, Alfalfa Juice Concentrate, European Elder Berry Extract, Broccoli Flower, Cabbage Leaf, Carrot Root, Collard Greens, Tomato Fruit, Mustard Greens, Kale Leaf, Spinach Leaf, Green Tea Leaf Extract, Dulce, Blue-Green Algae, Kelp Leaf and Stem, Stevia Leaf Extract

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	The glutathione peroxidase and superoxide dismutase enzyme system are part of the body's built in system for neutralizing free radicals. However, fruits and vegetables, provide additional antioxidants that also quench free radicals.* These antioxidants from dietary sources have been the focus of clinical trials documenting their healthy supportive effects.*	Inulin from Chicory root, Guar Gum Seed Extract, Barley Grass, Alfalfa Sprouts, Broccoli Sprouts, Radish Sprouts, Oat Grass, Wheat Grass, Alfalfa Juice Concentrate, European Elder Berry Extract, Broccoli Flower, Cabbage Leaf, Carrot Root, Collard Greens, Tomato Fruit, Mustard Greens, Kale Leaf, Spinach Leaf, Green Tea Leaf Extract, Dulce, Blue-Green Algae, Kelp Leaf and Stem, Stevia Leaf Extract

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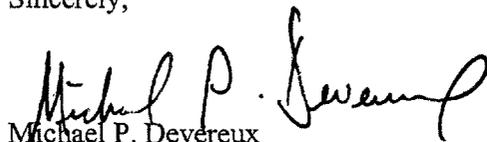
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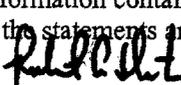
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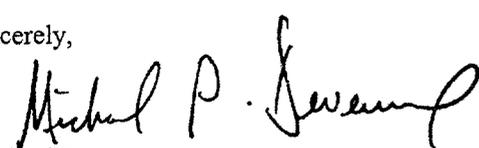
PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	Lycopene (tomatoes) provides support for prostate gland health, and has been shown to support cardiovascular health by preventing the oxidation of LDL cholesterol.*	Tomato Fruit

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Title: Senior Vice President of Scientific Affairs

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Earth's Promise™	Lutein and zeaxanthin (spinach and other dark green leafy vegetables) are deposited in high concentrations in the macular region of the retina. It is believed that these antioxidants play an important supportive role in eye health by supporting macular pigment development.* Macular pigment absorbs ultraviolet radiation from the sun, among other functions.*	Inulin from Chicory root, Guar Gum Seed Extract, Barley Grass, Alfalfa Sprouts, Broccoli Sprouts, Radish Sprouts, Oat Grass, Wheat Grass, Alfalfa Juice Concentrate, European Elder Berry Extract, Broccoli Flower, Cabbage Leaf, Carrot Root, Collard Greens, Tomato Fruit, Mustard Greens, Kale Leaf, Spinach Leaf, Green Tea Leaf Extract, Dulse, Blue-Green Algae, Kelp Leaf and Stem, Stevia Leaf Extract

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Title: Senior Vice President of Scientific Affairs

Date: 11-16-04

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Sincerely,

A handwritten signature in black ink that reads "Michael P. Devereux". The signature is written in a cursive style with a large, stylized initial "M".

Michael P. Devereux  
Chief Financial Officer



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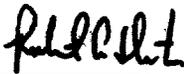
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	In laboratory tests, spinach extract shows greater free radical quenching activity than green tea, N-acetylcysteine (NAC), or vitamin E.*	Spinach Leaf

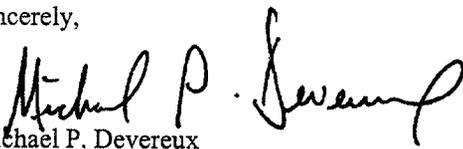
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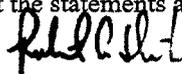
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	Green tea has been shown in research studied to both increase the activity of the glutathione peroxidase and superoxide dismutase enzyme systems, as well as protect lipids and proteins from oxidation.*	Green Tea Leaf Extract

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November 17, 2004

Office of Nutritional Products, Labeling &  
Dietary Supplements, HFS 810  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
5100 Paint Branch Parkway  
College Park, MD 20740

RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. 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.

PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	Carrot contains high levels of the antioxidant beta-carotene, and has been found in research studies to increase plasma antioxidant levels.*	Carrot Root

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: 

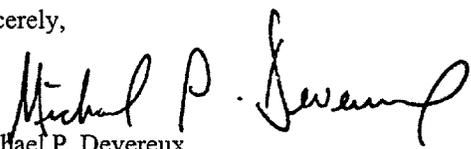
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 11-17-04

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

Sincerely,



Michael P. Devereux  
Chief Financial Officer



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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	In one clinical study, potassium and magnesium showed support for healthy bones in older individuals.* Some of the potassium and magnesium-rich ingredients found in Earth's Promise include: tomato, broccoli, carrots and spinach.	Broccoli Sprouts, Broccoli Flower, Cabbage Leaf, Tomato Fruit, Carrot Root, Spinach Leaf

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, 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: 11-17-04

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Sincerely,

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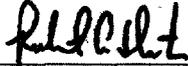
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	The inulin and fructooligosaccharides in Earth's Promise also support calcium absorption, a crucial factor in maintaining healthy bone density.* And, kale also supports the absorption of magnesium, another crucial mineral for healthy bones.*	Inulin from chicory root, Guar Gum Seed Extract

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By: 

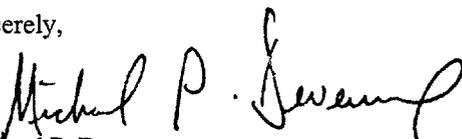
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 11-17-04

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Sincerely,



Michael P. Devereux  
Chief Financial Officer



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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Earth's Promise™	Chlorophyll, responsible for sustaining the life of plants through photosynthesis, is also rich in enzymes and magnesium. It is found in barley, wheat and oat grasses, as well as alfalfa sprouts and kelp. Chlorophyll has been extensively researched for its support of the immune system.*	Barley Grass, Alfalfa Sprouts, Oat, Wheat Grass, Kelp Leaf and Stem

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By: 

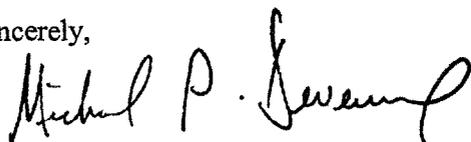
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 11-17-04

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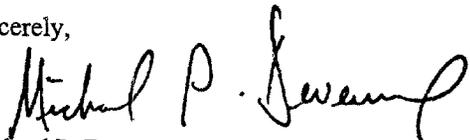
Sincerely,

A handwritten signature in black ink that reads "Michael P. Devereux". The signature is written in a cursive style with a large, prominent initial "M".

Michael P. Devereux  
Chief Financial Officer

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

Sincerely,



Michael P. Devereux  
Chief Financial Officer



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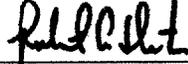
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	Certain carotenoids such as beta-carotene and lycopene are thought to regulate the immune response.*	Tomato Fruit, Carrot Root

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

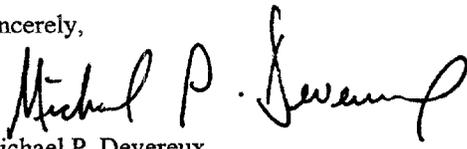
By:   
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 11-19-04

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

Sincerely,

  
Michael P. Devereux  
Chief Financial Officer



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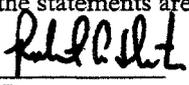
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	Carrots have high levels of beta-carotene, which has been shown to enhance natural killer cell activity.* And tomatoes have high concentrations of lycopene, which has shown to support the immune system, prostate health, and macular health.*	Tomato Fruit, Carrot Root

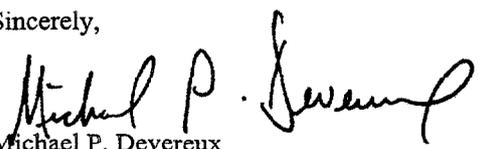
I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By:   
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 11-18-04

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

Sincerely,  
  
Michael P. Devereux  
Chief Financial Officer



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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	Kelp, alfalfa sprouts and wheat, barley and oat grass provide magnesium. Magnesium is associated with energy production at a cellular level, and has been studied for its role supporting the immune system.*	Kelp Leaf and Stem, Alfalfa Sprouts, Wheat Grass, Barley Grass, Oat Grass

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: \_\_\_\_\_  
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 11-18-04

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

Sincerely,

Michael P. Devereux  
Chief Financial Officer



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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	Blue-green algae, a water-borne plant, naturally has vitamin A, essential amino acids and zinc. Zinc has been studied for its association with natural killer cell activity.*	Blue-green algae

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: \_\_\_\_\_  
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 11-17-04

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Sincerely,

Michael P. Devereux  
Chief Financial Officer



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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Earth's Promise™	Both broccoli and broccoli sprouts are a source of sulforaphanes. Sulforaphanes are associated with immune health support.*	Broccoli Flower, Broccoli Sprouts

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By: \_\_\_\_\_  
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 11-18-04

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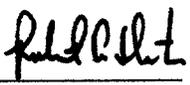
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	The polyphenols in green tea, specifically EGCG, have been the subject of many scientific studies showing their antioxidant and immune support activity. EGCG has been shown to support colon, breast and prostate health.*	Green Teal Leaf Extract

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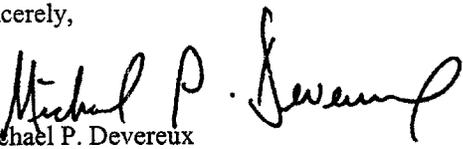
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	Green tea has been shown to support the immune system and T-cell formation.*	Green Teal Leaf Extract

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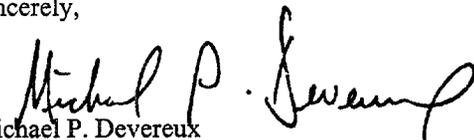
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November 18, 2004

Office of Nutritional Products, Labeling &  
Dietary Supplements, HFS 810  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
5100 Paint Branch Parkway  
College Park, MD 20740

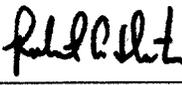
RE: Label Claims/Disclaimers

Dear Sir or Madam:

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	Inulin fiber acts as a prebiotic in the digestive tract, promoting bile excretion and helping foster a healthy climate for probiotic beneficial bacteria. They also aid in the absorption of minerals such as calcium, magnesium and zinc.*	Inulin from chicory root

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: 

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 11-18-04

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

Sincerely,



Michael P. Devereux  
Chief Financial Officer



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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	Soluble and insoluble fiber from inulin also supports healthy digestion and colon function, by safely absorbing and eliminating toxins.*	Inulin from chicory root

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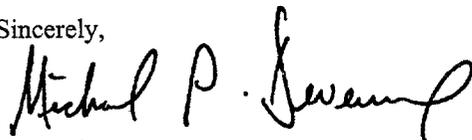
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	Fiber promotes bowel movements and modulates gastric and intestinal physiology.*	Inulin from chicory root, Guar Gum Seed Extract

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: \_\_\_\_\_  
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 11-19-04

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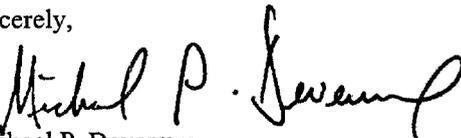
PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	Fiber has been demonstrated in numerous clinical studies to provide support of gastrointestinal, cardiovascular, immune, and endocrine function health.*	Inulin from chicory root, Guar Gum Seed Extract

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	Current research also indicates that wheat grass, one of the three grasses in Earth's Promise, may support gastric and colonic health.*	Wheat Grass

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	Many of the ingredients in Earth's Promise are associated with the retention of healthy cholesterol levels that are already within normal range.* Inulin and oligofructose, guar gum, barley, carrot, broccoli, cabbage, and green tea have been clinically studied for this benefit.*	Inulin from chicory root, Guar Gum Seed Extract, Barley Grass, Carrot Root, Broccoli Sprouts, Broccoli Flower, Cabbage Leaf, Green Tea Leaf Extract

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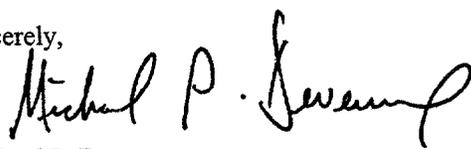
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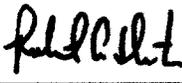
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Earth's Promise™	In a scientific study, adding guar gum to a healthy diet supported the retention of healthy cholesterol levels already within normal limits.*	Guar Gum Seed Extract

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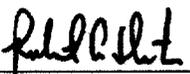
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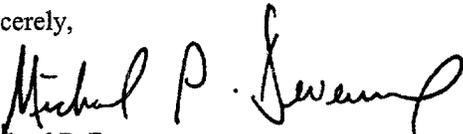
PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	The broccoli and cabbage found in Earth's Promise may also support the retention of healthy cholesterol levels already within normal limits.* A randomized, double-blind clinical study found that a broccoli and cabbage combination supported healthy HDL and LDL levels in just 9 weeks.*	Broccoli Sprouts, Broccoli Flower, Cabbage Leaf

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	Broccoli sprouts have also been scientifically studied for their support of cardiovascular health.* Fourteen weeks of treatment with broccoli sprouts that contained the naturally occurring compound, glucoraphanin, showed significant antioxidant support for cardiovascular and kidney function.*	Broccoli Sprouts

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: \_\_\_\_\_

Robert C. Doster

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Date: 11-19-04

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	In a scientific study, beta-carotene supported the retention of healthy cholesterol and triglyceride levels already within normal limits in the liver.*	Carrot Root

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	Already associated with antioxidant activity and macular health, green tea consumption is also associated with cardiovascular support, and research also shows that green tea may regulate mitochondrial functions and have iron chelating properties.*	Green Tea Leaf Extract

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Earth's Promise™	In addition to its ability to support the retention of healthy cholesterol levels already within normal limits, guar gum also plays a part in regulating blood glucose levels already within normal limits.* In clinical trial, guar gum significantly supported blood glucose levels compared with controls.*	Guar Gum Seed Extract

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, 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: 11-20-04

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

Sincerely,  
Michael P. Devereux  
Michael P. Devereux  
Chief Financial Officer



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P: 920.469.9099 ♦ F: 920.469.4418 (Phyto)

November 20, 2004

Office of Nutritional Products, Labeling &  
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Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
5100 Paint Branch Parkway  
College Park, MD 20740

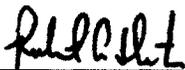
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	Fiber from inulin and barley also support healthy blood sugar levels already within normal limits.*	Inulin from Chicory Root, Guar Gum Seed Extract

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: 

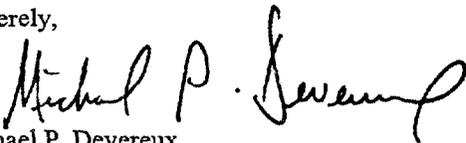
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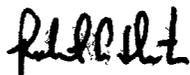
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	Many of the nutrients in Earth's Promise support healthy eye function.* Lutein and zeaxanthin are found in high concentrations in green vegetables, such as spinach, mustard greens and kale. Studies have shown that intake of lutein and zeaxanthin-rich foods are associated with macular support.*	Broccoli Flower, Cabbage Leaf, Tomato Fruit, Collard Greens, Mustard Greens, Kale Leaf, Spinach Leaf

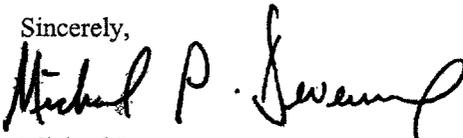
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	In one clinical study, men consuming high levels of lutein and zeaxanthin intake showed greater support of healthy eye function than men with lower intakes.*	Broccoli Flower, Cabbage Leaf, Tomato Fruit, Collard Greens, Mustard Greens, Kale Leaf, Spinach Leaf

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

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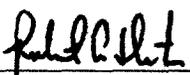
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	Specific foods high in carotenoids like broccoli and spinach were most consistently associated with beneficial effects.*	Broccoli Flower, Carrot Root, Spinach Leaf

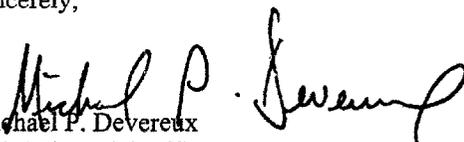
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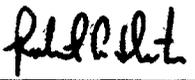
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Earth's Promise™	Fiber supports colon health, and aids in the absorption of calcium, which is crucial for healthy bone formation.* Inulin and FOS are prebiotics that act as a food source to stimulate the growth of beneficial microflora (and probiotics) in the intestines. As an insoluble fiber also increase stool frequency and stool weight. Also shown in clinical studies to enhanced the absorption of calcium by 18%.*	Inulin from Chicory Root

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By: 

Robert C. Doster

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	Barley supports the retention of healthy blood sugar and cholesterol levels that are already within normal limits.*	Barley Grass

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

Date: 11-21-04

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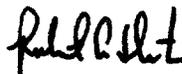
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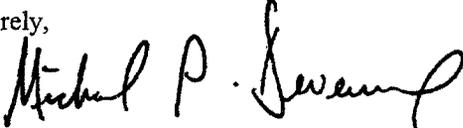
PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	Alfaifa sprouts are one of the highest sources of phytoestrogens, which support immune system, bone health and cardiovascular health.*	Alfaifa Sprouts and Alfaifa Juice Concentrate

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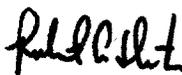
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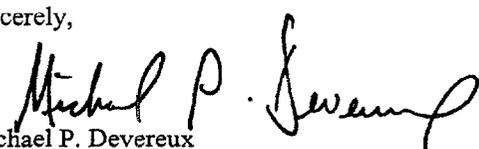
PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	The phytoestrogens found in alfalfa sprouts have been studied for their support of thyroid health.*	Alfalfa Sprouts and Alfalfa Juice Concentrate

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	Radish sprouts have twice the antioxidant levels of vitamin C alone.*	Radish Sprouts

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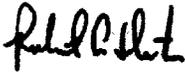
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Earth's Promise™	In one clinical study, men consuming high levels of lutein and zeaxanthin intake showed greater support of healthy eye function than men with lower intakes.*	Broccoli Flower

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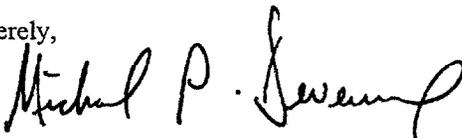
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College Park, MD 20740

RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. 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.

PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	Beta-carotene is well known for its support of the immune system. Shown in research studies to support macrophage function and NK-cell activity.*	Carrot Root

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: \_\_\_\_\_

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 11-21-04

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

Sincerely,

Michael P. Devereux  
Chief Financial Officer



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P: 920.469.9099 ♦ F: 920.469.4418 (Phyto)

November 21, 2004

Office of Nutritional Products, Labeling &  
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Center for Food Safety and Applied Nutrition  
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	In another scientific study, beta-carotene from carrots significantly increased antioxidant levels.*	Carrot Root

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: 

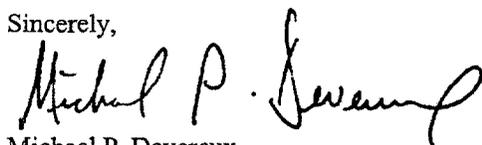
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	Lutein and zeaxanthin have documented support for immune, eye, and cardiovascular health.*	Collard Greens

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

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

Date: 11-22-04

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	In a clinical study, mustard greens showed antioxidant properties.*	Mustard Greens

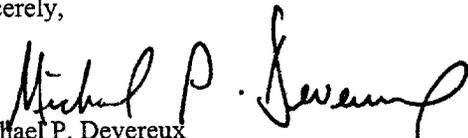
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	Kale naturally has high levels of the carotenoids, lutein and beta-carotene and supports the absorption of magnesium, a crucial mineral for healthy bones.*	Kale Leaf

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By: \_\_\_\_\_

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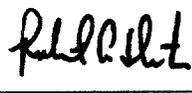
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	More potent antioxidant activity than green tea, N-acetylcysteine (NAC), or vitamin E. Shown in laboratory studies to have immune supportive effects.*	Spinach Leaf

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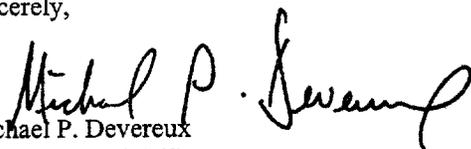
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	Green tea consumption is also associated with cardiovascular support, and research also shows that green tea may regulate mitochondrial functions and have iron chelating properties.*	Green Tea Leaf Extract

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By: \_\_\_\_\_

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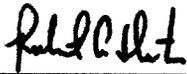
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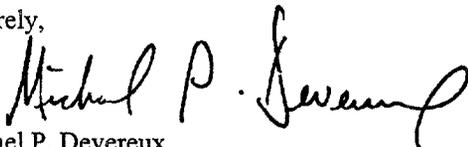
PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	Fiber from dulse supports digestive health; the proteins in this form are highly bioavailable.*	Dulse

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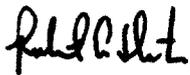
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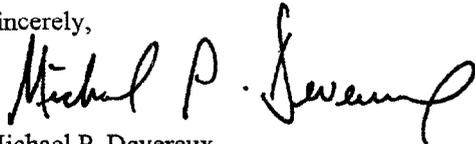
PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	Supports the thyroid and thyroid hormone production and cardiovascular health.*	Kelp Leaf and Stem

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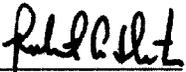
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	Earth's Promise Greens gives you a delicious way to support your health and vitality.*	Inulin from Chicory root, Guar Gum Seed Extract, Barley Grass, Alfalfa Sprouts, Broccoli Sprouts, Radish Sprouts, Oat Grass, Wheat Grass, Alfalfa Juice Concentrate, European Elder Berry Extract, Broccoli Flower, Cabbage Leaf, Carrot Root, Collard Greens, Tomato Fruit, Mustard Greens, Kale Leaf, Spinach Leaf, Green Tea Leaf Extract, Dulse, Blue-Green Algae, Kelp Leaf and Stem, Stevia Leaf Extract

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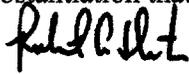
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Earth's Promise™	One glass provides essential nutrients you need to enhance your energy, support digestion and boost your immune system.*	Inulin from Chicory root, Guar Gum Seed Extract, Barley Grass, Alfalfa Sprouts, Broccoli Sprouts, Radish Sprouts, Oat Grass, Wheat Grass, Alfalfa Juice Concentrate, European Elder Berry Extract, Broccoli Flower, Cabbage Leaf, Carrot Root, Collard Greens, Tomato Fruit, Mustard Greens, Kale Leaf, Spinach Leaf, Green Tea Leaf Extract, Dulse, Blue-Green Algae, Kelp Leaf and Stem, Stevia Leaf Extract

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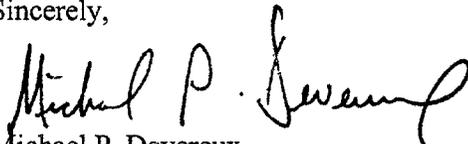
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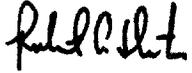
RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. 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.

PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	A delightful tasting way to use the earth's bounty to fortify your body and spirit.*	Inulin from Chicory root, Guar Gum Seed Extract, Barley Grass, Alfalfa Sprouts, Broccoli Sprouts, Radish Sprouts, Oat Grass, Wheat Grass, Alfalfa Juice Concentrate, European Elder Berry Extract, Broccoli Flower, Cabbage Leaf, Carrot Root, Collard Greens, Tomato Fruit, Mustard Greens, Kale Leaf, Spinach Leaf, Green Tea Leaf Extract, Dulse, Blue-Green Algae, Kelp Leaf and Stem, Stevia Leaf Extract

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.



By: \_\_\_\_\_

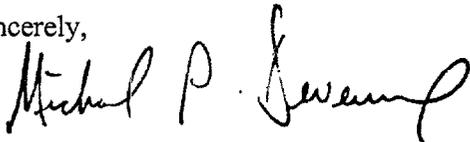
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 11-21-04

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

Sincerely,



Michael P. Devereux  
Chief Financial Officer