



ENZYMATIC THERAPY
INCORPORATED

*What **Better** feels like.™*

INTEGRATIVE THERAPEUTICS INC.™
NF Formulas + PhytoPharmica
Tyler Encapsulations + Vitaline Formulas

9755 SW Commerce Circle, Suite B2
Wilsonville, OR 97070
P: 503.582.8386 + F: 503.582.0467

ENZYMATIC THERAPY™
&
PHYTOPHARMICA™

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 12, 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 29 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.

Earth's Promise™	Research has confirmed that diets high in natural foods are associated with benefits for immune, gastrointestinal and cardiovascular health.*	Inulin from Chicory root, Guar Gum Seed Extract, Barley Grass, Alfalfa Sprouts, Broccoli Sprouts, Radish Sprouts, Oat Grass, Wheat Grass, Alfalfa Juice Concentrate, Peppermint (Mentha x piperita) Leaf, 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.

97S 0162

LET

15044

Robert C. Doster

By: _____
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 11/12/04

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



ENZYMATIC THERAPY
INCORPORATED

*What **Better** feels like.™*

INTEGRATIVE THERAPEUTICS INC.™

NF Formulas • PhytoPharmica
Tyler Encapsulations • Vitaline Formulas

9755 SW Commerce Circle, Suite B2
Wilsonville, OR 97070
P: 503.582.8386 • F: 503.582.0467

**ENZYMATIC THERAPY®
&
PHYTOPHARMICA®**

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 13, 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	CLAIM
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, Peppermint (Mentha x piperita) Leaf, 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

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: 11/13/04

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

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



ENZYMATIC THERAPY
INCORPORATED

*What **Better** feels like.™*

INTEGRATIVE THERAPEUTICS INC.™
NF Formulas • PhytoPharmica
Tyler Encapsulations • Vitaline Formulas

9755 SW Commerce Circle, Suite B2
Wilsonville, OR 97070
P: 503.582.8386 • F: 503.582.0467

ENZYMATIC THERAPY™
&
PHYTOPHARMICA™

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 13, 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.

PROBING		
Earth's Promise™	The glutathione peroxidase and superoxide dismutase enzyme systems are part of the body's built in system for neutralizing free radicals.* Fruit and vegetables contain additional antioxidants that also quench free radicals.* These antioxidants from dietary sources have been the focus of clinical trials documenting their health 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, Peppermint (Mentha x piperita) Leaf, 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
Robert C. Doster
Title: Senior Vice President of Scientific Affairs

Date: 11/13/04

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



ENZYMATIC THERAPY
INCORPORATED

*What **Better** feels like.™*

INTEGRATIVE THERAPEUTICS INC.™
NF Formulas + PhytoPharmica
Tyler Encapsulations + Vitaline Formulas

9755 SW Commerce Circle, Suite B2
Wilsonville, OR 97070
P: 503.582.8386 + F: 503.582.0467

ENZYMATIC THERAPY™
&
PHYTOPHARMICA™

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

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.

Earth's Promise™	Research has confirmed that diets high in fruits and vegetables are associated with benefits for immune, gastrointestinal and cardiovascular health.*	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.

R. Doster

By: _____

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 11/15/04

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

Sincerely,

Michael P. Devereux

Michael P. Devereux
Chief Financial Officer



ENZYMATIC THERAPY
INCORPORATED

*What **Better** feels like.™*

INTEGRATIVE THERAPEUTICS INC.™

NF Formulas • PhytoPharmica
Tyler Encapsulations • Vitaline Formulas

9755 SW Commerce Circle, Suite B2
Wilsonville, OR 97070
P: 503.582.8386 • F: 503.582.0467

ENZYMATIC THERAPY™

&
PHYTOPHARMICA™

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 21, 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.

Earth's Promise™	Grasses, too, such as barley support the retention of healthy cholesterol levels that are already within the normal limits.*	Barley 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
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
Michael P. Devereux
Chief Financial Officer



ENZYMATIC THERAPY
INCORPORATED

*What **Better** feels like.™*

INTEGRATIVE THERAPEUTICS INC.™
NF Formulas + PhytoPharmica
Tyler Encapsulations + Vitaline Formulas

9755 SW Commerce Circle, Suite B2
Wilsonville, OR 97070
P: 503.582.8386 + F: 503.582.0467

ENZYMATIC THERAPY™
&
PHYTOPHARMICA™

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 12, 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.

Earth's Promise™	Research has confirmed that diets high in fruits and vegetables are associated with benefits for immune, gastrointestinal and cardiovascular health.*	Inulin (from Chicory root), Guar Gum Seed Extract, Barley Grass (Hordeum vulgare), Alfalfa Sprouts, Fruit Blend: mango fruit, kiwi fruit, strawberry fruit, Broccoli Sprouts, Diakon Radish Sprouts (Raphanus sativus), Oat Grass (Avena sativa), Wheat Grass, Alfalfa Juice Concentrate, Broccoli Flower, Cabbage Leaf, Tomato Fruit (Lycopersicon esculentum), Carrot Root, Collard Greens (Brassica oleracea acephala), Mustard Greens, Kale Leaf (Brassica oleracea acephala), Spinach Leaf (Spinacia oleracea), Green Tea (Carnellia sinensis) Leaf Extract, Dulse, Blue-Green algae, Kelp Leaf and Stem (Ascophyllum nodosum & Laminaria digitata), 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.

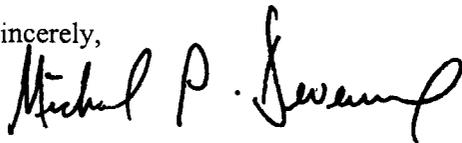
By: 

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

Date: 11/12/04

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