



INTEGRATIVE THERAPEUTICS INC.
 NF Formulas PhytoPharmica
 Tyler Encapsulations Vitaline Formulas

ENZYMATIC THERAPY*
 &
PHYTOPHARMICA*

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

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)

ENZYMATIC THERAPY

*What **Better** feels like.*

1253 5 MAY 23 P2 70

May 10, 2005

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.

<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Similase®	Helps unlock nutrition from food.*	Plant Enzymes: Amylase, Protease I,II,III,IV, Lipase I,II, Lactase I,II, Phytase, Cellulase I,II, Sucrase (Invertase), Maltase (Malt Diastase)

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 5-10-05

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

975 0162

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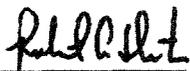
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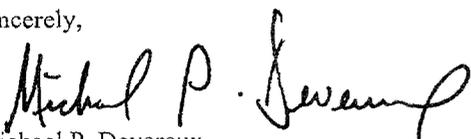
<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Similase®	Used as a digestive aid to break down cellulose*	Plant Enzymes: Amylase, Protease I,II,III,IV, Lipase I,II, Lactase I,II, Phytase, Cellulase I,II, Sucrase (Invertase), Maltase (Malt Diastase)

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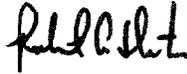
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Similase®	Supports mineral absorption and bioavailability of iron, zinc, calcium and magnesium.*	Plant Enzymes: Amylase, Protease I,II,III,IV, Lipase I,II, Lactase I,II, Phytase, Cellulase I,II, Sucrase (Invertase), Maltase (Malt Diastase)

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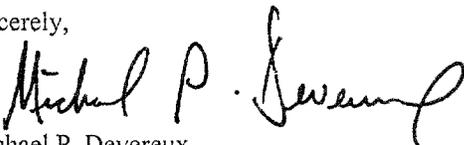
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date 5-11-05

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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>
Similase®	Helps alleviate symptoms associated with lactose intolerance.*	Plant Enzymes: Amylase, Protease I,II,III,IV, Lipase I,II, Lactase I,II, Phytase, Cellulase I,II, Sucrase (Invertase), Maltase (Malt Diastase)

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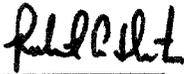
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Similase®	Ensures optimal processing and nutritional value derived from food.*	Plant Enzymes: Amylase, Protease I,II,III,IV, Lipase I,II, Lactase I,II, Phytase, Cellulase I,II, Sucrase (Invertase), Maltase (Malt Diastase)

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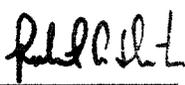
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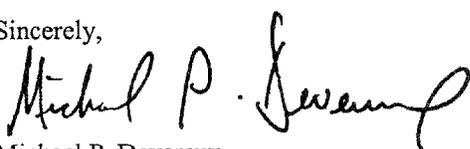
PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Similase®	Helps ensure optimal levels of enzymes necessary for proper digestion, which can alleviate problems with bloating, cramping and occasional diarrhea.*	Plant Enzymes: Amylase, Protease I,II,III,IV, Lipase I,II, Lactase I,II, Phytase, Cellulase I,II, Sucrase (Invertase), Maltase (Malt Diastase)

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