



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)

0083 5 SEP 22 P2:16

July 27, 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

AUG 10 2005

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 |
|--------------|----------------------------------|--|
| Recancostat® | Supports healthy cell apoptosis* | L-Glutathione, Reduced, AnthoRedoxin™ standardized to contain 10% anthocyanins, Beet (Beta vulgaris) Root Extract, Bilberry (Vaccinium myrtillus) Fruit Extract, Black Currant (Ribes nigrum) Berry Extract, European Elder (Sambucus nigra) Berry Extract, L-Cysteine |

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 Doster
Robert Doster
Title: Senior Vice President of Scientific Affairs
Date: 7/27/05

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

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| Recancostat® | Manages healthy cell apoptosis* | L-Glutathione, Reduced, AnthoRedoxin™ standardized to contain 10% anthocyanins, Beet (Beta vulgaris) Root Extract, Bilberry (Vaccinium myrtillus) Fruit Extract, Black Currant (Ribes nigrum) Berry Extract, European Elder (Sambucus nigra) Berry Extract, L-Cysteine |

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| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
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| Recancostat® | Supports the body's normal process of DNA repair.* | L-Glutathione, Reduced, AnthoRedoxin™ standardized to contain 10% anthocyanins, Beet (Beta vulgaris) Root Extract, Bilberry (Vaccinium myrtillus) Fruit Extract, Black Currant (Ribes nigrum) Berry Extract, European Elder (Sambucus nigra) Berry Extract, L-Cysteine |

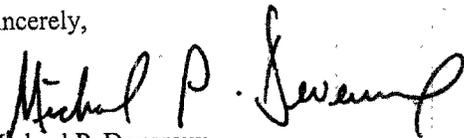
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|--------------|--|--|
| Recancostat® | GSH blocks free-radical damage to all types of tissue and supports the body's normal process of DNA repair.* | L-Glutathione, Reduced, AnthoRedoxin™ standardized to contain 10% anthocyanins, Beet (Beta vulgaris) Root Extract, Bilberry (Vaccinium myrtillus) Fruit Extract, Black Currant (Ribes nigrum) Berry Extract, European Elder (Sambucus nigra) Berry Extract, L-Cysteine |

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