



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™

1000 6 17 10 10

January 16, 2006

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
Blue Heron™	Supports healthy intestinal elimination and detoxification.*	Flax (Linum usitatissimum) Seed, Psyllium (Plantago ovata) Seed Husk, Rice (Oryza sativa) Bran, Dried Plum (Prunus domestica) Fruit, Fenugreek (Trigonella foenum-graecum) Seed, Slippery Elm (Ulmus rubra) Bark, Triphala (a blend of amla fruit (Phyllanthus emblica), belleric myrobalan fruit (Terminalia belleria and chebulic myrobalan fruit (Terminalia chebula)), Spectra Probiotic Proprietary Blend- Lactobacillus acidophilus, Bifidobacterium bifidum, Bifidobacterium infantis, Bifidobacterium longum, Lactobacillus helveticus, Lactobacillus casei, Lactobacillus salivarius, Streptococcus thermophilus, Marshmallow (althaea officinalis) Root Extract, Papain

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: 1-16-06

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

Sincerely,

 Michael P. Devereux
 Chief Operations Officer

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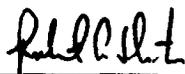
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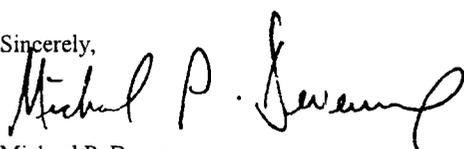
PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Blue Heron™	Promotes healthy intestinal flora.*	Flax (Linum usitatissimum) Seed, Psyllium (Plantago ovata) Seed Husk, Rice (Oryza sativa) Bran, Dried Plum (Prunus domestica) Fruit, Fenugreek (Trigonella foenum-graecum) Seed, Slippery Elm (Ulmus rubra) Bark, Triphala (a blend of amla fruit (Phyllanthus emblica), belleric myrobalan fruit (Terminalia belleria and chebulic myrobalan fruit (Terminalia chebula)), Spectra Probiotic Proprietary Blend- Lactobacillus acidophilus, Bifidobacterium bifidum, Bifidobacterium infantis, Bifidobacterium longum, Lactobacillus helveticus, Lactobacillus casei, Lactobacillus salivarius, Streptococcus thermophilus, Marshmallow (althaea officinalis) Root Extract, Papain

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