



NF Formulas



PhytoPharmica



Tyler Encapsulations



Vitaline Formulas

RECEIVED
JUN 27 2003
BY:

July 2, 2003

Mr. Robert Moore
Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 811
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

Notification of structure-function claims

Dear Sir:

This letter is to notify you that the following product manufactured, packed, and/or distributed by PhytoPharmica (9725 SW Commerce Circle, Suite A6, Wilsonville, OR 97070) has literature that contains a statement provided for by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. PhytoPharmica wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and complies with section 403(r)(6) of the act.

Product Name	Statement	Ingredient(s) to which claim refers
Varicosin™	"Gotu kola has shown in clinical studies to increase the integrity of the tissue that supports veins*."	Butcher's Broom (<i>Ruscus aculeatus</i>) Root and Rhizome Extract Horse Chestnut (<i>Aesculus hippocastanum</i>) Seed Extract Gotu Kola (<i>Centella asiatica</i>) Leaf Phytosome™

I certify that the information contained in this notice is complete and accurate, and that PhytoPharmica has substantiation that the statement is truthful and not misleading.

Mario Roxas, N.D.
Director of Technical Services

7/2/03
Date

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NF Formulas



PhytoPharmica

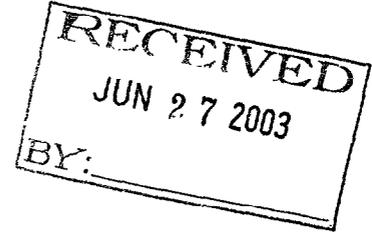


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Product Name	Statement	Ingredient(s) to which claim refers
Varicosin™	"Varicosin provides standardized herbal extracts that nutritionally support proper circulation and healthy veins in the legs*."	Butcher's Broom (<i>Ruscus aculeatus</i>) Root and Rhizome Extract Horse Chestnut (<i>Aesculus hippocastanum</i>) Seed Extract Gotu Kola (<i>Centella asiatica</i>) Leaf Phytosome™

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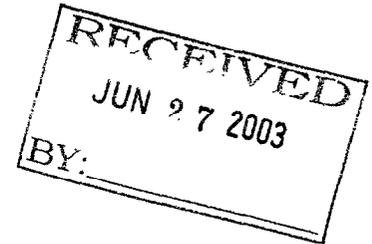
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Product Name	Statement	Ingredient(s) to which claim refers
Varicosin™	"Horse chestnut (escin) has been shown to decrease capillary permeability by reducing the number and size of pores, which helps improve tone of vascular walls*."	Butcher's Broom (<i>Ruscus aculeatus</i>) Root and Rhizome Extract Horse Chestnut (<i>Aesculus hippocastanum</i>) Seed Extract Gotu Kola (<i>Centella asiatica</i>) Leaf Phytosome™

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