



November 13, 2003

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Office of Nutritional Products, Labeling and 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 PhytoPharmica, (a Division of Integrative Therapeutics, 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. PhytoPharmica 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>
Uriphron®	Goldenrod stimulates the elimination of fluids and supports the kidneys and bladder with the key saponins and tannins.*	European Goldenrod (Solidago virgaurea) Aerial Part Extract, Birch (Betula pendula) Leaf Extract, Orthosiphon (Orthosiphon aristatus) Leaf Extract

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica 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: 11/13/03

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

Uriphron 3p

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