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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)

October 5, 2004

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.

<p>Earth's Promise™</p>	<p>The ingredients in Earth's Promise contain vitamins, minerals, and key compounds that have been shown in scientific research to support major body systems.* These foods are also high in antioxidant activity to help reduce the effects of oxidative stress.*</p>	<p>Fiber Blend: inulin from Chicory root, guar gum seed extract Greens Blend: barley grass, alfalfa sprouts, broccoli sprouts, radish sprouts, oat grass, wheat grass, alfalfa juice concentrate, Fruit Blend: mango fruit, kiwi fruit, strawberry fruit, Vegetable Blend: broccoli flower, cabbage leaf, carrot root, collard greens, tomato fruit, mustard greens, kale leaf, spinach leaf, Green Tea Leaf Extract, Seaweed Blend: dulse, blue-green algae, kelp leaf and stem, Stevia Leaf Extract</p>
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975 0162

LET 14772

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.

Robert C. Doster

By: _____

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 10/5/04

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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<p>Earth's Promise™</p>	<p>Young grasses provide much higher nutrient levels than maturing grasses. The barley, oat and wheat grasses in Earth's Promise are organically grown and contain high levels of vitamins, minerals and amino acids. They are also sources of potent antioxidants and essential nutrients.*</p>	<p>Fiber Blend: inulin from Chicory root, guar gum seed extract Greens Blend: barley grass, alfalfa sprouts, broccoli sprouts, radish sprouts, oat grass, wheat grass, alfalfa juice concentrate, Fruit Blend: mango fruit, kiwi fruit, strawberry fruit, Vegetable Blend: broccoli flower, cabbage leaf, carrot root, collard greens, tomato fruit, mustard greens, kale leaf, spinach leaf, Green Tea Leaf Extract, Seaweed Blend: dulse, blue-green algae, kelp leaf and stem, Stevia Leaf Extract</p>
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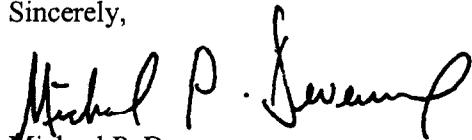
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Earth's Promise™	The glutathione peroxidase and superoxide dismutase enzyme system are part of the body's built in system for neutralizing free radicals. However, fruits and vegetables, provide additional antioxidants that also quench free radicals.* These antioxidants from dietary sources have been the focus of clinical trials documenting their healthy supportive effects.*	Fiber Blend: inulin from Chicory root, guar gum seed extract Greens Blend: barley grass, alfalfa sprouts, broccoli sprouts, radish sprouts, oat grass, wheat grass, alfalfa juice concentrate, Fruit Blend: mango fruit, kiwi fruit, strawberry fruit, Vegetable Blend: broccoli flower, cabbage leaf, carrot root, collard greens, tomato fruit, mustard greens, kale leaf, spinach leaf, Green Tea Leaf Extract, Seaweed Blend: dulse, blue-green algae, kelp leaf and stem, Stevia Leaf Extract
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R. C. Doster

By: _____
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 10/5/04

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Sincerely,

Michael P. Devereux

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October 7, 2004

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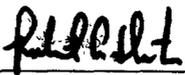
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Earth's Promise™	In one clinical study, potassium and magnesium showed support for healthy bones in older individuals.* Some of the potassium and magnesium-rich ingredients found in Earth's Promise include: tomato, broccoli, carrots and spinach.	Broccoli Sprouts, Broccoli Flower, Cabbage Leaf, Tomato Fruit, Carrot Root, Spinach Leaf
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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: 10/7/04

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

Sincerely,


Michael P. Devereux
Chief Financial Officer



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October 12, 2004

Office of Nutritional Products, Labeling &
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5100 Paint Branch Parkway
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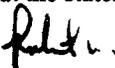
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Earth's Promise™	Broccoli sprouts have also been scientifically studied for their support of cardiovascular health.* Fourteen weeks of treatment with broccoli sprouts that contained the naturally occurring compound, glucoraphanin, showed significant antioxidant support for cardiovascular and kidney function.*	Broccoli Sprouts
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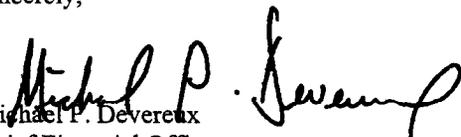
By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 10/12/04

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

Sincerely,


Michael P. Devereux
Chief Financial Officer



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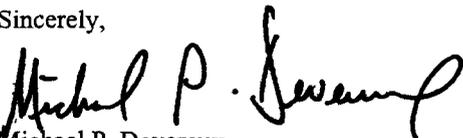
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PRODUCT NAME	CLAIMS	INGREDIENTS TO WHICH CLAIMS RELATE
Earth's Promise™	In a scientific study, beta-carotene supported the retention of healthy cholesterol and triglyceride levels already within normal limits in the liver.*	Carrot Root

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: 10/12/04

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Earth's Promise™	Grasses, too, such as barley support the retention of healthy cholesterol levels that are already within normal limits.*	Barley Grass
------------------	--	--------------

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By: 
Robert C. Doster
Title: Senior Vice President of Scientific Affairs

Date: 10/13/04

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

Sincerely,

Michael P. Devereux
Chief Financial Officer



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Earth's Promise™	Already associated with antioxidant activity and macular health, green tea consumption is also associated with cardiovascular support, and research also shows that green tea may regulate mitochondrial functions and have iron chelating properties.*	Green Tea Leaf Extract
------------------	---	------------------------

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Earth's Promise™	In addition to its ability to support the retention of healthy cholesterol levels already within normal limits, guar gum also plays a part in regulating blood glucose levels already within normal limits.* In clinical trial, guar gum significantly supported blood glucose levels compared with controls.*	Guar Gum Seed Extract
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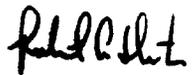
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Earth's Promise™	Fiber from inulin and barley also support healthy blood sugar levels already within normal limits.*	Inulin from Chicory Root, Guar Gum Seed Extract
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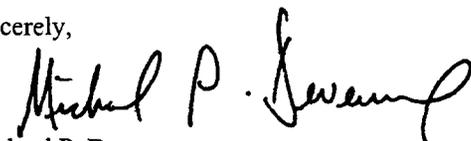
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Earth's Promise™	Many of the nutrients in Earth's Promise support healthy eye function.* Lutein and zeaxanthin are found in high concentrations in green vegetables, such as spinach, mustard greens and kale. Studies have shown that intake of lutein and zeaxanthin-rich foods are associated with macular support.*	Broccoli Flower, Cabbage Leaf, Tomato Fruit, Collard Greens, Mustard Greens, Kale Leaf, Spinach Leaf
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Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 10/14/04

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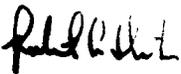
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This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of 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.

Earth's Promise™	In one clinical study, men consuming high levels of lutein and zeaxanthin intake showed greater support of healthy eye function than men with lower intakes.*	Broccoli Flower, Cabbage Leaf, Tomato Fruit, Collard Greens, Mustard Greens, Kale Leaf, Spinach Leaf
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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.

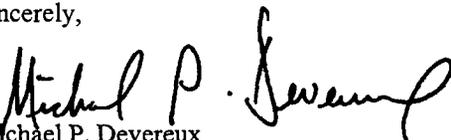
By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 10/14/04

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

Sincerely,


Michael P. Devereux
Chief Financial Officer



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P: 920.469.9099 + F: 920.469.4418 (Phyto)

October 14, 2004

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

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Earth's Promise™	Specific foods high in carotenoids like broccoli and spinach were most consistently associated with beneficial effects.*	Broccoli Flower, Carrot Root, Spinach Leaf
------------------	--	--

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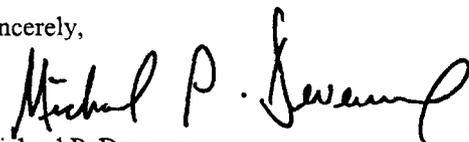
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Earth's Promise™	Fiber supports colon health, and aids in the absorption of calcium, which is crucial for healthy bone formation.* Inulin and FOS are prebiotics that act as a food source to stimulate the growth of beneficial microflora (and probiotics) in the intestines. As an insoluble fiber also increase stool frequency and stool weight. Also shown in clinical studies to enhanced the absorption of calcium by 18%.*	Inulin from Chicory Root
------------------	--	--------------------------

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By: Robert C. Doster

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 10/14/04

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

Sincerely,

A handwritten signature in black ink, appearing to read "Michael P. Devereux". The signature is written in a cursive style with a large, stylized initial "M".

Michael P. Devereux
Chief Financial Officer



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Earth's Promise™	Barley supports the retention of healthy blood sugar and cholesterol levels that are already within normal limits.*	Barley Grass
------------------	---	--------------

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By: _____
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 10/14/04

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Sincerely,

Michael P. Devereux
Chief Financial Officer



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October 15, 2004

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Earth's Promise™	Alfalfa sprouts are one of the highest sources of phytoestrogens, which support immune system, bone health and cardiovascular health.*	Alfalfa Sprouts
------------------	--	-----------------

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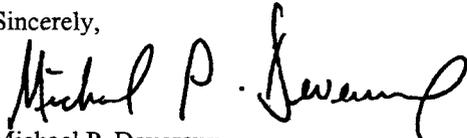
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Title: Senior Vice President of Scientific Affairs

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Earth's Promise™	The phytoestrogens found in alfalfa sprouts have been studied for their support of thyroid health.*	Alfalfa Sprouts

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: 10/15/04

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Earth's Promise™	Radish sprouts have twice the antioxidant levels of vitamin C alone.*	Radish Sprouts

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By: 
Robert C. Doster
Title: Senior Vice President of Scientific Affairs

Date: 10/15/04

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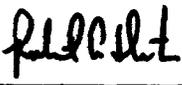
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[Redacted]	[Redacted]	[Redacted]
Earth's Promise™	Like barley and wheat grass, oat grass is a source of chlorophyll, which has been studied for its immune supportive effects.*	Oat Grass

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By: 
 Robert C. Doster
 Title: Senior Vice President of Scientific Affairs

Date: 10/15/04

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Earth's Promise™	Lycopene is a potent antioxidant, providing well established support for cardiovascular, prostate, immune and eye health.*	Tomato Fruit
------------------	--	--------------

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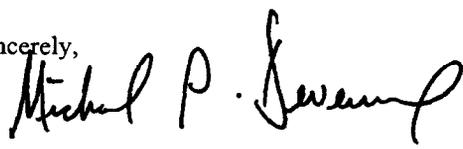
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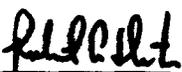
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Earth's Promise™	Beta-carotene is well known for its support of the immune system. Shown in research studies to support macrophage function and NK-cell activity.*	Carrot Root
------------------	---	-------------

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By: 
Robert C. Doster
Title: Senior Vice President of Scientific Affairs

Date: 10/15/04

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Earth's Promise™	In a scientific study, beta-carotene supported healthy cholesterol levels already within normal limits.*	Carrot Root

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By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 10/15/04

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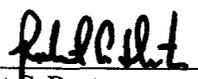
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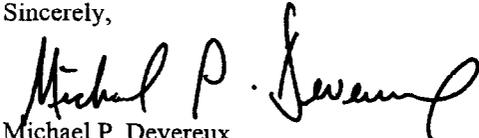
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Earth's Promise™	Lutein and zeaxanthin have documented support for immune, eye, and cardiovascular health.*	Collard Greens

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By: 
Robert C. Doster
Title: Senior Vice President of Scientific Affairs
Date: 10/15/04

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October 16, 2004

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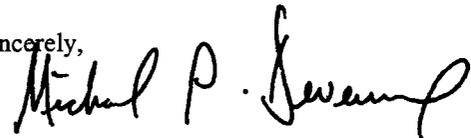
Earth's Promise™	In a clinical study, mustard greens showed antioxidant properties.*	Mustard Greens

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By: 
Robert C. Doster
Title: Senior Vice President of Scientific Affairs

Date: 10/16/04

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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)

October 16, 2004

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.

Earth's Promise™	More potent antioxidant activity than green tea, N-acetylcysteine (NAC), or vitamin E. Shown in laboratory studies to have immune supportive effects.*	Spinach Leaf

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: 10/16/04

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

Sincerely,

Michael P. Devereux
Chief Financial Officer



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INCORPORATED

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Earth's Promise™	Green tea consumption is also associated with cardiovascular support, and research also shows that green tea may regulate mitochondrial functions and have iron chelating properties.*	Green Tea Leaf Extract
------------------	--	------------------------

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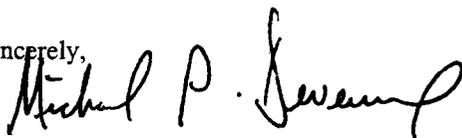
Earth's Promise™	Fiber from dulse supports digestive health; the proteins in this form are high bioavailable.*	Dulse

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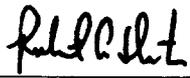
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Earth's Promise™	Supports the immune system; boost natural killer cell activity.*	Blue-green Algae

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Robert C. Doster

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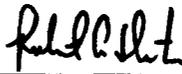
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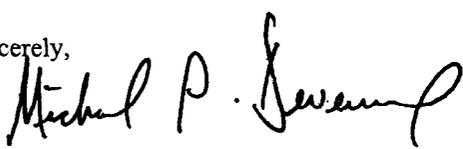
Earth's Promise™	Supports the thyroid and thyroid hormone production and cardiovascular health.*	Kelp Leaf and Stem

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Earth's Promise™	Higher intakes of fruit and vegetables are associated with greater support of the immune system.*	Fiber Blend: inulin from Chicory root, guar gum seed extract Greens Blend: barley grass, alfalfa sprouts, broccoli sprouts, radish sprouts, oat grass, wheat grass, alfalfa juice concentrate, Fruit Blend: mango fruit, kiwi fruit, strawberry fruit, Vegetable Blend: broccoli flower, cabbage leaf, carrot root, collard greens, tomato fruit, mustard greens, kale leaf, spinach leaf, Green Tea Leaf Extract, Seaweed Blend: dulse, blue-green algae, kelp leaf and stem, Stevia Leaf Extract
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By: *Robert C. Doster*

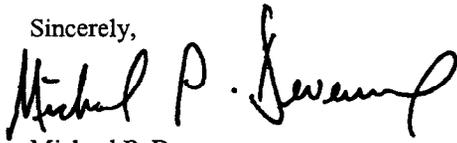
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Sincerely,

A handwritten signature in black ink that reads "Michael P. Devereux". The signature is written in a cursive style with a large, stylized initial "M".

Michael P. Devereux
Chief Financial Officer