



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)

October 19, 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.

Calcium D-Glucarate	Calcium d-Glucarate has been shown in research studies to support immune system function, promote estrogen metabolism, and enhance the body's detoxification systems through inhibition of beta-glucuronidase.*	Calcium (as Calcium D-Glucarate), Calcium D-Glucarate
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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.

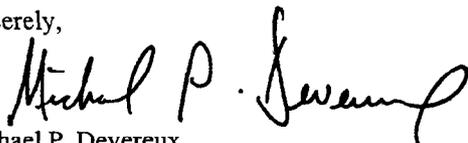
By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date 10/19/04

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

97S 0162 LET 14816



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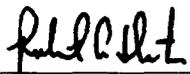
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Calcium D-Glucarate	Calcium d-glucarate has the ability to inhibit the action of beta-glucuronidase, thereby supporting the body's natural detoxification pathways.*	Calcium (as Calcium D-Glucarate), Calcium D-Glucarate
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I 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 10/19/04

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October 20, 2004

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Calcium D-Glucarate	Calcium- D-glucarate is well tolerated and has been shown to support detoxification and immune function.*	Calcium (as Calcium D-Glucarate), Calcium D-Glucarate
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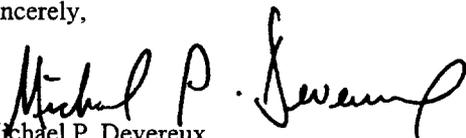
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