



**ENZYMATIC THERAPY**  
INCORPORATED

*What **Better** feels like.™*

**INTEGRATIVE THERAPEUTICS INC.™**  
NF Formulas + PhytoPharmica  
Tyler Encapsulations + Vitaline Formulas

9755 SW Commerce Circle, Suite B2  
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P: 503.582.8386 + F: 503.582.0467

**ENZYMATIC THERAPY™**  
&  
**PHYTOPHARMICA™**

825 Challenger Drive, Green Bay, WI 54311-8328  
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P: 920.469.9099 + F: 920.469.4418 (Phyto)

October 24, 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.

PRODUCT NAME	STATEMENT'S	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™	Grasses, vegetables and fiber for overall nutritional support*	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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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: 10/24/04

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