



INTEGRATIVE THERAPEUTICS INC.
 NF Formulas • PhytoPharmica
 Tyler Encapsulations • Vitaline Formulas
 9755 SW Commerce Circle, Suite B2
 Wilsonville, OR 97070
 P: 503.582.8386 • F: 503.582.0457

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)

ENZYMATIC THERAPY

INCORPORATED

*What **Better** feels like™*

November 21, 2005

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	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise – The Goodness of Orange	Earth's Promise Orange is the easy way to enhance your diet, support a strong heart, maintain healthy vision and boost your immune system.*	Vitamin A (as beta carotene), Vitamin C (from orange fruit and sodium ascorbate), Potassium (from potassium citrate and Fruit and Vegetable Blend), Fruit and Vegetable Blend: orange fruit, whole apple, carrot root juice, carrot root, banana fruit, apricot fruit, orange fruit uice, sweet potato root, mango fruit, tomato fruit, pumpkin fruit extract, butternut squash fruit, papaya fruit, cantaloupe fruit, mangosteen fruit, Fiber Blend, Grape (Vitis vinifera) Seed Extract, Stevia Leaf Extract, Mixed Bioflavonoids (from citrus fruits), Lycopene, Lutein

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.

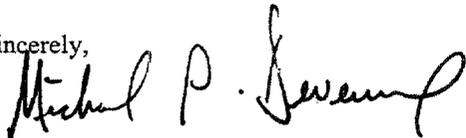
By: Robert Doster
 Robert Doster
 Title: Senior Vice President of Scientific Affairs

Date: 11/21/05

975 0162 LET 17037

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 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



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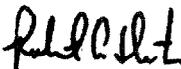
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise - The Goodness of Orange	A delicious way to use the earth's bounty to fortify your body and spirit.*	Vitamin A (as beta carotene), Vitamin C (from orange fruit and sodium ascorbate), Potassium (from potassium citrate and Fruit and Vegetable Blend), Fruit and Vegetable Blend: orange fruit, whole apple, carrot root juice, carrot root, banana fruit, apricot fruit, orange fruit uice, sweet potato root, mango fruit, tomato fruit, pumpkin fruit extract, butternut squash fruit, papaya fruit, cantaloupe fruit, mangosteen fruit, Fiber Blend, Grape (Vitis vinifera) Seed Extract, Stevia Leaf Extract, Mixed Bioflavonoids (from citrus fruits), Lycopene, Lutein

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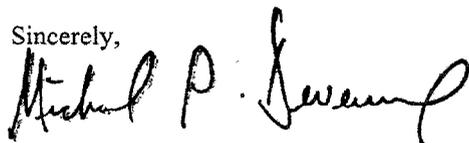
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Robert Doster

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Michael P. Devereux
Chief Financial Officer