



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

ENZYMATIC THERAPY*
 &
PHYTOPHARMICA*

9755 SW Commerce Circle, Suite B2
 Wilsonville, OR 97070
 P: 503.582.8386 F: 503.582.0467

825 Challenger Drive, Green Bay, WI 54311-8328
 P: 920.469.4313 F: 888.570.6460 (Enzymatic)
 P: 920.469.9099 F 920.469.4418 (Phyto)

ENZYMATIC THERAPY

*What **Better** feels like™*

December 8, 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.

<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Earth's Promise™ Strawberry-Kiwi	The rich, vibrant colors of fruits and vegetables aren't just for decoration. They're nature's way of telling you that these foods are bursting with a wide range of vitamins, nutrients and phytonutrients – naturally occurring, plant-based antioxidants that support a vast array of health benefits ranging from immune to heart to vision health and much more.*	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

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
 Robert C. Doster
 Title: Senior Vice President of Scientific Affairs
 Date: 12-8-05

373 0162 LEI 17092

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 Operations Officer



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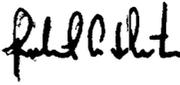
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Earth's Promise™ Strawberry-Kiwi	Helps maintain healthy vision*	Fiber Blend: inulin from Chicory root, guar gum seed extract Greens Blend: barley grass, alfalfa sprouts, broccoli sprouts, radish sprouts, oat grass, wheat grass, alfalfa juice concentrate, 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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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Earth's Promise™ Strawberry-Kiwi	Enhances natural killer cell activity, supporting 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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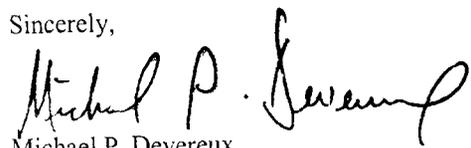
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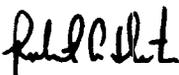
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Earth's Promise™ Strawberry-Kiwi	Helps maintain bone health*	Fiber Blend: inulin from Chicory root, guar gum seed extract Greens Blend: barley grass, alfalfa sprouts, broccoli sprouts, radish sprouts, oat grass, wheat grass, alfalfa juice concentrate, 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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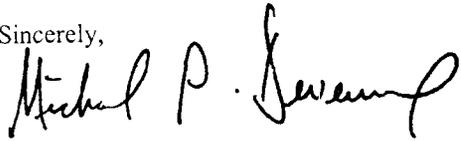
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Earth's Promise™ Strawberry-Kiwi	Maintains healthy teeth and bones*	Fiber Blend: inulin from Chicory root, guar gum seed extract Greens Blend: barley grass, alfalfa 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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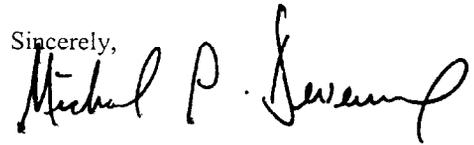
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