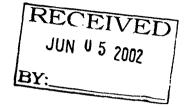


May 28, 2002

1532 22 1113 2012

Office of Special Nutritionals (HFS-450) Center for Food Safety and Applied Nutrition U. S. Food and Drug Administration 5100 Paint Branch Parkway College Park, MD 20740-3835



Label Claims/Disclaimers RE:

Dear Sir/Madam:

This letter is to notify you that PhytoPharmica at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a distributor and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the labels of the following product.

COMPANY PRODUCT DIETARY STATEMENTS NAME INGREDIENTS			
Phyto- Pharmica (a Division of Integrative Therapeutics Inc.)	EchinaCare®	Echinacea Purpurea Fresh-Pressed Aerial Part Juice	EchinaCare® uses only the stems, leaves, and flowers to obtain the fresh-pressed juice which is readily assimilated by the body's tissues.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

Title: Senior Vice President of Scientific Affairs

Date: 5-28.02

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

Sincerely,

Chief Financial Officer

10186

825 CHALLENGER DRIVE GREEN BAY, WI 54311-8328 920-469-9099

TOLL FREE 800-553-2370 FAX 920-469-4418 FAX TOLL FREE 888-311-5657

WWW.PHYTOPHARMICA.COM

EchinaCare2p