



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

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

**ENZYMATIC THERAPY**

INCORPORATED

*What **Better** feels like.*

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: 920.469.1313 • F: 888.570.6460 (Enzymatic)  
 P: 920.469.9099 • F: 920.469.4418 (Phyto)

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.

PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™ Peppermint	Helps maintain healthy teeth and bones*	Inulin from Chicory root, Guar Gum Seed Extract, Barley Grass, Alfalfa Sprouts, Broccoli Sprouts, Radish Sprouts, Oat Grass, Wheat Grass, Alfalfa Juice Concentrate, Peppermint (Mentha x piperita) Leaf, Broccoli Flower, Cabbage Leaf, Carrot Root, Collard Greens, Tomato Fruit, Mustard Greens, Kale Leaf, Spinach Leaf, Green Tea Leaf Extract, 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.

*Robert C. Doster*

By: \_\_\_\_\_  
 Robert C. Doster  
 Title: Senior Vice President of Scientific Affairs

Date: 12-8-05

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

Sincerely,  
  
 Michael P. Devereux  
 Chief Operations Officer

975 0162 LET 17090



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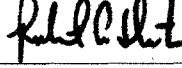
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™ Peppermint	The rich, vibrant colors of fruits and vegetables aren't just for decoration. They're nature's way of telling you that these foods are bursting with a wide 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.*	Inulin from Chicory root, Guar Gum Seed Extract, Barley Grass, Alfalfa Sprouts, Broccoli Sprouts, Radish Sprouts, Oat Grass, Wheat Grass, Alfalfa Juice Concentrate, Peppermint (Mentha x piperita) Leaf, Broccoli Flower, Cabbage Leaf, Carrot Root, Collard Greens, Tomato Fruit, Mustard Greens, Kale Leaf, Spinach Leaf, Green Tea Leaf Extract, Dulce, Blue-Green Algae, Kelp Leaf and Stem, Stevia Leaf Extract

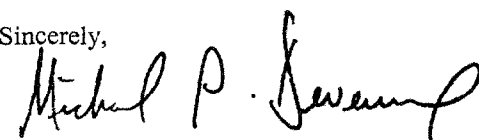
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By:   
Robert C. Doster  
Title: Senior Vice President of Scientific Affairs

Date: 12-8-05

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Sincerely,



Michael P. Devereux  
Chief Operations Officer



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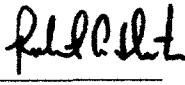
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™ Peppermint	Helps maintain healthy vision*	Inulin from Chicory root, Guar Gum Seed Extract, Barley Grass, Alfalfa Sprouts, Broccoli Sprouts, Radish Sprouts, Oat Grass, Wheat Grass, Alfalfa Juice Concentrate, Peppermint (Mentha x piperita) Leaf, Broccoli Flower, Cabbage Leaf, Carrot Root, Collard Greens, Tomato Fruit, Mustard Greens, Kale Leaf, Spinach Leaf, Green Tea Leaf Extract, Dulse, Blue-Green Algae, Kelp Leaf and Stem, Stevia Leaf Extract

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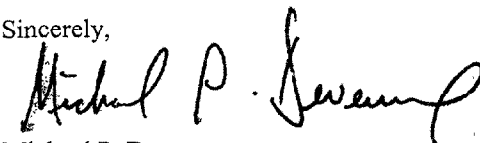
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Title: Senior Vice President of Scientific Affairs

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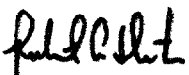
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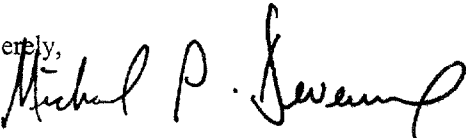
PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™ Peppermint	Enhances natural killer cell activity, supporting the immune system.*	Inulin from Chicory root, Guar Gum Seed Extract, Barley Grass, Alfalfa Sprouts, Broccoli Sprouts, Radish Sprouts, Oat Grass, Wheat Grass, Alfalfa Juice Concentrate, Peppermint (Mentha x piperita) Leaf, Broccoli Flower, Cabbage Leaf, Carrot Root, Collard Greens, Tomato Fruit, Mustard Greens, Kale Leaf, Spinach Leaf, Green Tea Leaf Extract, Dulce, Blue-Green Algae, Kelp Leaf and Stem, Stevia Leaf Extract

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