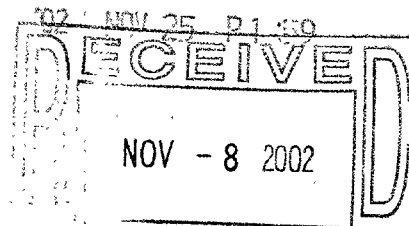




November 7, 2002

0236



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

RE: Label Claims/Disclaimers

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 NAME	DIETARY INGREDIENTS	STATEMENTS
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Clinical Nutrients™ Flax Oil Capsules fortified with Borage & Pumpkin	Flaxseed Oil, Pumpkin Seed Oil, Borage Seed Oil	Clinical Nutrients Flax Oil capsules is the preferred source of essential fatty acids. The advantage of Clinical Nutrients Flax Oil capsules include: Lignan precursors and phytosterols, valued for their special nutritional benefits.*

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.

By: Robert C. Doster

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 11/7/02

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

CN Flax Oil 4p

97S 0162

LET

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825 CHALLENGER DRIVE  
GREEN BAY, WI 54311-8328  
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TOLL FREE 800-553-2370  
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FAX TOLL FREE 888-311-5657  
WWW.PHYTOPHARMICA.COM