

July 29, 2002

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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	<u>STATEMENTS</u>
Phyto- Pharmica (a Division of Integrative Therapeutics Inc.)	Pro-Gest™	Niacin, Betaine HCl, L-Glutamic Acid HCl, Bromelain, Papain, Alpha Amylase, Lipase, Mycozyme, Ox Bile Extract, Pancreas Extract	The enzymes in Pro-Gest™ support healthy digestion – especially protein and fat digestion.*

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: KLICILL

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/29/02

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

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Pro-Gest 1p