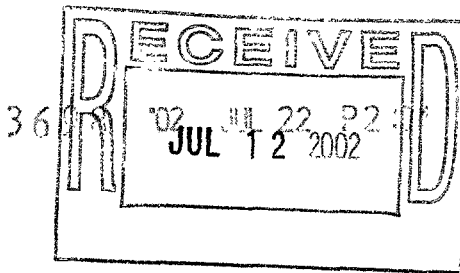




July 8, 2002



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

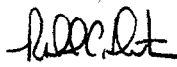
RE: Label Claims/Disclaimers

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.)	Glucosamine Sulfate	Chloride, Sodium, Glucosamine Sulfate	Glucosamine sulfate is up to 98% absorbable, which makes it more readily available to the body to support healthy articular cartilage.*

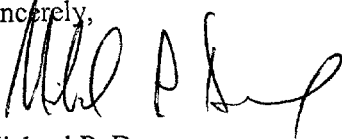
I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By: 
Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 7-8-02

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

975 0162

LET 10621

81173

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



July 9, 2002

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

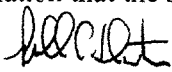
RE: Label Claims/Disclaimers

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.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Glucosamine Sulfate	Chloride, Sodium, Glucosamine Sulfate	Clinical studies show it's a key building block for connective tissue and cartilage.*

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

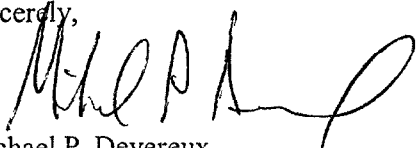
By: 
Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 7.9.02

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

825 CHALLENGER DRIVE
GREEN BAY, WI 54311-8328
920-469-9099
TOLL FREE 800-553-2370
FAX 920-469-4418