



January 23, 2003

0903 '03 MAR -3 P154

Mr. Robert Moore  
Office of Nutritional Products, Labeling &  
Dietary Supplements, HFS 811  
Food and Drug Administration  
5100 Paint Branch Parkway  
College Park, MD 20740

RE: Label Claims/Disclaimers

Dear Mr. Moore:

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. 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.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Calgest™	Vitamin C, Vitamin B6, Calcium Chloride, Calcium Phosphate, Magnesium Glycerophosphate, Betaine HCl, Ammonium Chloride, Kidney Extract, Mixed Bioflavonoids	The body must maintain the proper acid-alkaline (pH) balance to function at optimal levels. Overly alkaline body fluids can make calcium harder to absorb. And calcium is essential for strengthening bones.*

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: 1/23/03

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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