

March 24, 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

APR 0 3 2002

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.) | Green Tea Extract | Green Tea (Camellia sinensis) Leaf Extract | Dietary supplement to protect cells from free- radical damage more effectively than vitamin E* |

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 Title: Senior Vice President of Scientific Affairs

Date:

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 469-3608

975 0162 LET 9747

Sincerely

Michael P. Devereux Chief Financial Officer

79930

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

Green Tea Extract 1p



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|--|----------------------|---|--|
| Phyto- Pharmica (a Division of Integrative Therapeutics Inc.) | Green Tea Extract | Green Tea (Camellia sinensis) Leaf Extract | Studies show that green tea extract is stronger than vitamin E in protecting against free-radical damage to cellular function* |

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 Title: Senior Vice President of Scientific Affairs

3/24/02 Date:

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