

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



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 Nutrient™ Eye Formula	Vitamin A, Vitamin C, Vitamin E, Riboflavin, Zinc, Selenium, Copper, Hachimijiogan Herbal Complex, Bilberry(Vaccinium myrtillus) Berry Extract, Turmeric (Curcuma Ionga) Root Extract, Grape (Vitis vinifera) Seed Extract, Lutein	Dietary supplement to provide comprehensive nutritional support for eye health*

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: 327/02

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

Michael P. Devereux Chief Financial Officer Clinical Nutrient Eye Formula

975 0162 LET 9750

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