



RAVIMIAMET

Via Naturale OÜ
Pootsmani 10
51017 TARTU

21.11.2024 nr JV-4/4254-2

OTSUS

Higher Nature Ltd toodete True Food Clarity kapslid, True Food Rekindle kapslid ja True Food Vitality kapslid määratlemiseks

Ettevõtte Via Naturale OÜ esitas Ravimiametile 20.11.2024 taotlused ettevõtte Higher Nature Ltd toodete True Food Clarity kapslid, True Food Rekindle kapslid ja True Food Vitality kapslid ravimitena määratlemiseks.

Võttes arvesse kõiki andmeid toodete koostiste, omaduste ja avalikustatud teabe kohta ning tuginedes ravimiseaduse § 2 lõigetele 1 ja 2, sotsiaalministri 13.04.2005. a määruse nr 59 "Aine või toote ravimina määratlemise tingimused ja kord" § 2 lõigetele 1–4 ning § 3 lõigetele 1–3, 5 ja 6,

otsustab Ravimiamet

määratleda ettevõtte Higher Nature Ltd tooted True Food Clarity kapslid, True Food Rekindle kapslid ja True Food Vitality kapslid ravimite hulka mittekuuluvateks, kuna toodetel puuduvad ravimile omased toimed (farmakoloogiline, immunoloogiline või metaboolne) ja toodetega ei kaasne informatsiooni, mis oleks aluseks toodete ravimitena määratlemiseks.

Vaide käesolevale otsusele saab esitada Ravimiametile 30 päeva jooksul arvates otsuse teatavakstegemisest vastavalt haldusmenetluse seaduse § 71 lõikele 1. Kui otsuse saaja soovib otsust vaidlustada halduskohtus, võib ta vastavalt halduskohtumenetluse seadustiku § 7 lõikele 1 ja § 46 lõikele 1 esitada kaebuse otsuse peale Tartu Halduskohtule 30 päeva jooksul otsuse teatavaks tegemisest arvates.

(allkirjastatud digitaalselt)

Evelin Saar
Järelevalveosakonna spetsialist

Lisad. Ettevõtte Higher Nature Ltd toodete True Food Clarity kapslid, True Food Rekindle kapslid ja True Food Vitality kapslid määratlemiseks taotlustes esitatud andmed (7 lk).

Lisa 1. Toote True Food Clarity kapslid määratlemiseks esitatud andmed (2 lk).

True Food Clarity
Toidulisand, 60 kapslit.
Sobib taimetoitlastele ja veganitele

KASUTUSJUHISED:

Tarvitamisjuhised: täiskasvanud 2 kapslit päevas koos söögiga – 1 hommikusöögiga ja 1 lõuna- või õhtusöögiga või vastavalt professionaali soovitudele. Ei sobi raseduse planeerimise, raseduse ega rinnaga toimise ajal ega alla 18 aastastele lastele. Toidulisandit mitte kasutada mitmekesise toitumise asendajana. Oluline on toituda mitmekülgset ja tasakaalustatult ning harrastada tervislikku elustiili. Ärge ületage soovitatud päevast annust. Mitte tarvitada, kui pakend on purunenud. Kui olete meditsiinilise järelevalve all, konsulteerige enne toote tarvitamist arstiga.

TOOTEINFO:

Koostisosad	Päevane annus (2 kapslit) sisaldab	%NRV*-st
Memophenol™ (Prantsuse viinamarjade ja metsamustikate viljaliha ekstraktid) annab 75% polüfenoolide üldsisaldusest	600 mg	-
Vesikaak (<i>Bacopa monnieri</i>) ekstrakt 10:1 ekvivalentne <i>Bacopa monnieri</i> pulbriga	60 mg 600 mg	-
Lõvilakk (<i>Lion's mane</i>) seene viljakeha ekstrakt 10:1 ekvivalentne <i>lion's mane</i> seenepulbriga, mis sisaldab 10% polüsahhariide	100 mg 1000 mg	-
Foolhape (spinatist)	200 µg	100
Vitamiin B12 (segu kobalamiin šiiitakest)	10 µg	400

*NRV (nutrient reference value) – päevane võrdluskogus

Koostisosad: Prantsuse viinamarjade ja metsmustikate viljaliha ekstraktid [Memophenol™], kapsel (hüdroksüpropüülmetüülsellulos, vesikaak (*Bacopa monnieri*) ekstrakt, lõvilakk (*lion's mane*) seene viljakeha ekstrakt, spinati lehtede ekstrakt, šiiitake seene viljakeha ekstrakt.

Mitte tarvitada, kui pakend on purunenud. Säilitada jahedas, kuivas ja lastele kättesaamatus kohas, eemal päikesevalgusest.

Parim enne: vaata pakendilt.

Päritolumaa: Ühendkuningriik (UK)

Tootja: Higher Nature.

Maaletooja: Via Naturale OÜ, info@vianaturale.ee, tel. +372 5071255

FOOD SUPPLEMENT

Product information:

Two capsules typically provide:

		%NRV [†]
Memophenol™ (French whole grape and wild blueberry fruit extracts) providing 75% total polyphenols	600mg	
Bacopa monnieri extract 10:1 equivalent to bacopa monnieri powder	60mg 600mg	
Lion's mane mushroom fruiting body extract 10:1 equivalent to lion's mane mushroom powder providing 10% polysaccharides	100mg 1000mg	
Folic acid (from spinach)	200µg	100
Vitamin B12 (mixed cobalamin from shiitake)	10µg	400

[†]NRV = Nutrient Reference Value

Ingredients: French whole grape and wild blueberry fruit extracts (Memophenol™), capsule shell (hydroxypropyl methylcellulose), bacopa monnieri extract, lion's mane mushroom fruiting body extract, spinach leaf extract, shiitake mushroom fruiting body extract.

** Vitamin B12 contributes to normal energy-yielding metabolism and psychological function.

HIGHER NATURE®



True Food Clarity for Women

Powerful mind complex for great female thinkers

Nootropic blend of lion's mane, bacopa monnieri and scientifically backed Memophenol™



Brain*



Energy & metabolism**



Menopause

Natural source, no synthetics

60 vegan capsules

True Food Clarity for Women

- Memophenol™; a scientifically proven blend of wild blueberry and French whole grape extracts
- Bacopa monnieri supports normal cognitive function*
- Lion's mane from 100% fruiting bodies
- With True Food B vitamins from spinach and shiitake

Directions: Adults take 2 capsules daily: one with breakfast and one with lunch or dinner. Do not exceed recommended daily intake. Food supplements should not be used as a substitute for a varied and balanced diet and healthy lifestyle.

Warning: Not recommended if you are pregnant or breastfeeding. If you are taking any medication or have a medical condition, please consult your healthcare professional before using this product.

Storage: Store in a cool, dry place out of reach of children.

Memophenol™ is a registered trademark of Activ'Inside.

Higher Nature Ltd; (UK) 10 Discovery Way, Horam, East Sussex TN21 0GE, UK
(EU) Office 7, Strand Campus, Sligo Airport Business Park, Strandhill F91 W589, Ireland

Third party tested for quality assurance

TFCLR150-01 TFCLR060/101



PRODUCT INFO



The genuine real food supplement

Drawing on 30 years of expertise, Higher Nature True Food® supplements are carefully crafted to help keep you at your best.

Unlike other brands, we're not adding synthetic nutrients to yeast, bacteria or food pastes, we blend together real whole foods such as fruits, vegetables, mushrooms, herbs and seeds in order to create a naturally nutrient rich supplement that works better for you.

As these supplements are derived from real food ingredients your body already recognises, they are more biologically active, delivering their benefits faster than alternatives.

Wholly without synthetics, you can feel assured that your supplements are working in harmony with your body rather than against it, allowing you to live your life to its absolute fullest.

Higher Nature – pioneer of food-based supplements since 1994.

True Food® is a registered trademark of Higher Nature Ltd.

Lisa 2. Toote True Food Rekindle kapslid määratlemiseks esitatud andmed (2 lk).

True Food Rekindle naistele
Toidulisand, 60 kapslit.
Sobib taimetoitlastele ja veganitele

KASUTUSJUHISED:

Tarvitamisjuhised: täiskasvanud 2 kapslit päevas koos söögiga või vastavalt professionaali soovistele. Ei sobi raseduse planeerimise, raseduse ega rinnaga toimise ajal ega alla 18 aastastele lastele. Toidulisandit mitte kasutada mitmekesise toitumise asendajana. Oluline on toituda mitmekülselt ja tasakaalustatult ning harrastada tervislikku elustiili. Ärge ületage soovitatud päevast annust. Mitte tarvitada, kui pakend on purunenud. Kui olete meditsiinilise järelevalve all, konsulteerige enne toote tarvitamist arstiga.

TOOTEINFO:

Koostisosad	Päevane annus (2 kapslit) sisaldab	%NRV*-st
Lambaläätse seemnete ekstrakt 4:1 <i>ekvivalentne lambaläätse seemnete pulbrile</i>	480 mg 1920 mg	-
Liboost® damiana (<i>Turnera diffusa</i>) lehe ekstrakt <i>annab 1.5% bioflavonoide</i>	300 mg	-
Harilik kuradisarv (<i>Tribulus terrestris</i>) standardiseeritud ekstrakt <i>annab 40% saponiine</i>	150 mg	-
Korea ženšenni ekstrakt 10:1 <i>ekvivalentne Korea ženšenni pulbriga</i>	100 mg 1000 mg	-
Tsink (šiitakest)	4 mg	40

*NRV (nutrient reference value) – päevane võrdluskogus

Koostisosad: Lambaläätse seemnete ekstrakt, damiana (*turnera diffusa*) lehtede ekstrakt [Liboost®], kapsel (hüdroksüpropüülmetüülselluloos, *tribulus terrestris* standardiseeritud ekstrakt, Korea ženšenni (*panax ginseng*) ekstrakt, šiitake seene viljakeha (sisaldab sellerit). Allergeenide info: vaata koostisosi paksus kirjas.

Mitte tarvitada, kui pakend on purunenud. Säilitada jahedas, kuivas ja lastele kättesaamatus kohas, eemal päikesevalgusest.

Parim enne: vaata pakendilt.

Päritolumaa: Ühendkuningriik (UK)

Tootja: Higher Nature Ltd.

Maaletooja: Via Naturale OÜ, info@vianaturale.ee, tel. +372 5071255

FOOD SUPPLEMENT

Product information:

Two capsules typically provide:

		%NRV†
Fenugreek seed extract 4:1	480mg	
equivalent to fenugreek seed powder	1920mg	
Liboost® damiana (<i>turnera diffusa</i>) leaf extract	300mg	
providing 1.5% bioflavonoids		
Tribulus terrestris standardised extract	150mg	
providing 40% saponins		
Korean ginseng extract 10:1	100mg	
equivalent to Korean ginseng powder	1000mg	
Zinc (from shiitake)	4mg	40

†NRV = Nutrient Reference Value

Ingredients: Fenugreek seed extract, damiana (*turnera diffusa*) leaf extract [Liboost®], capsule shell (hydroxypropyl methylcellulose), tribulus terrestris standardised extract, Korean ginseng (panax ginseng) extract, shiitake mushroom fruiting body (contains **celery**).

Allergy advice: see ingredients in **bold**.

HIGHER NATURE®



True Food Rekindle for Women

Keep the flame burning with nature's sexiest plant powered blend

5 synergistic ingredients with scientifically backed Liboost®



Natural source, no synthetics
60 vegan capsules

True Food Rekindle for Women

- Liboost®; a superior standardised damiana extract
- Female focused botanicals
- Works on mind and body*
- Scientifically dosed

*Zinc contributes to normal cognitive function, fertility and reproduction

Directions: Adults take 2 capsules daily with a meal. Do not exceed recommended daily intake. Food supplements should not be used as a substitute for a varied and balanced diet and healthy lifestyle.

Warning: If you are pregnant, breastfeeding, taking any medication or have a medical condition, please consult your healthcare professional before using this product.

Storage: Store in a cool, dry place out of reach of children.

Liboost® is a registered trademark of Pharmactive Biotech Products, S.L.U

Higher Nature Ltd; (UK) 10 Discovery Way, Horam, East Sussex TN21 0GE, UK
(EU) Office 7, Strand Campus, Sligo Airport Business Park, Strandhill F91W589, Ireland

Third party tested
for quality assurance

TFREK128-01 TFREK060/101



PRODUCT INFO



The genuine real food supplement

Drawing on 30 years of expertise, Higher Nature True Food® supplements are carefully crafted to help keep you at your best.

Unlike other brands, we're not adding synthetic nutrients to yeast, bacteria or food pastes, we blend together real whole foods such as fruits, vegetables, mushrooms, herbs and seeds in order to create a naturally nutrient rich supplement that works better for you.

As these supplements are derived from real food ingredients your body already recognises, they are more biologically active, delivering their benefits faster than alternatives.

Wholly without synthetics, you can feel assured that your supplements are working in harmony with your body rather than against it, allowing you to live your life to its absolute fullest.

Higher Nature – pioneer of food-based supplements since 1994.

True Food® is a registered trademark of Higher Nature Ltd.

Lisa 3. Toote True Food Vitality kapslid määratlemiseks esitatud andmed (3 lk).

True Food Vitality naistele

Vitamiinide ja mineraalainete kompleks terviktoidust

Toidulisand, 60 kapslit.

Sobib taimetoitlastele ja veganitele

KASUTUSJUHISED:

Tarvitamisjuhised: 2 kapslit päevas koos söögiga või vastavalt professionaali soovitudele. Ei sobi raseduse planeerimise, raseduse ega rinnaga toimise ajal ega alla 18 aastastele lastele. Toidulisandit mitte kasutada mitmekesise toitumise asendajana. Oluline on toituda mitmekülgsest ja tasakaalustatult ning harrastada tervislikku elustiili. Ärge ületage soovitatud päevast annust. Mitte tarvitada, kui pakend on purunenud. Kui olete meditsiinilise järelevalve all, konsulteerige enne toote tarvitamist arstiga. Toode sisaldab rauda, mis suures koguses võib olla kahjulik väikestele lastele. Hoida lastele kättesaamatus kohas. Ärge kasutage toodet, kui tarvitate hüübimisvastaseid ravimeid (lubatud ainult arsti soovitusel).

TOOTEINFO:

Koostisosad	Päevane annus (2 kapslit) sisaldab	%NRV*-st
Vitamiin A (porgandist) (1499 iu)	450 µg RE	56
Vitamiin D3 (samblikust) (1500 iu)	37.5µg	750
Vitamiin E (päevalilleseemne tuumast) (8.9 iu)	6 mg α-TE	50
Vitamiin K	197 µg	263
- Vitamiin K1 (petersellist)	137 µg	
- Vitamiin K2 MK-7 (nattost)	60 µg	
Vitamiin C (amlast ja petersellist)	60 mg	75
Tiamiin (vitamiin B1 küüslaugust ja päevalilleseemne tuumast)	2.5 mg	227
Riboflaviin (vitamiin B2 kookospähklist)	2.5 mg	179
Niatsiin (vitamiin B3 shiitakest ja küüslaugust)	15 mg NE	94
Vitamiin B6 (küüslaugust)	3.2 mg	229
Foolhape (spinatist)	400 µg	200
Vitamiin B12 (segu kobalamiin shiitakest)	6.5 µg	260
Biotiin (päevalilleseemne tuumast)	34 µg	68
Pantoteenhape (shiitakest)	4 mg	67
Magneesium (merelisest allikast)	60 mg	16
Raud (karrilehest)	3.3 mg	24
Tsink (shiitakest)	8.2 mg	82
Seleen (päevalilleseemne tuumast ja shiitakest)	58.6 µg	107
Kroom (petersellist ja moringast)	35 µg	88
Jood (merevetikast)	50 µg	33
AstraGin® (<i>astragalus membranaceous</i> juure & <i>panax notoginseng</i> juure ekstraktid)	35 mg	-

*NRV (nutrient reference value) – päevane võrdluskogus

RE (*retinol equivalent*) – retinooli ekvivalent

α -TE (*Alpha Tocopherol Equivalent*) –Alfa-tokoferooli ekvivalent

NE (*Niacin Equivalent*) – niatsiini ekvivalent

Koostisosad: Taimede, seente ja adaptogeenide ekstraktide segu (amla vili, päevalilleseemne tuumast, moringa lehed, shiitake seente viljakeha, küüslaugu, porgandi juur, karrilehed, spinatilehed, küüslaugulehed, kookospähkli kaste, samblik), kapsel (hüdroksüpropüülmetüülselluloos), magneesium vesinikoksiid (merelisest allikast), vetikas (*ascophyllum nodosum*), *panax notoginseng* and *astragalus membranaceus* ekstraktid (AstraGin®), menakinoon 7 (MK-7) natto ekstraktist.

Mitte tarvitada, kui pakend on purunenud. Säilitada jahedas, kuivas ja lastele kättesaamatus kohas, eemal päikesevalgusest.

Parim enne: vaata pakendilt.

Päritolumaa: Ühendkuningriik (UK)

Tootja: Higher Nature.

Maaletooja: Via Naturale OÜ, info@vianaturale.ee, tel. +372 5071255

FOOD SUPPLEMENT

Product information:
Two capsules typically provide:

			%NRV [†]
Vitamin A (from carrot)	(1499iu)	450µg RE	56
Vitamin D3 (from lichen)	(1500iu)	37.5µg	750
Vitamin E (from sunflower seed kernel)	(8.9iu)	6mg α -TE	50
Vitamin K		197µg	263
- Vitamin K1 (from parsley)		137µg	
- Vitamin K2 MK-7 (from natto)		60µg	
Vitamin C (from amla & parsley)		60mg	75
Thiamin (vitamin B1 from garlic & sunflower seed kernel)		2.5mg	227
Riboflavin (vitamin B2 from coconut aminos)		2.5mg	179
Niacin (vitamin B3 from shiitake & garlic)		15mg NE	94
Vitamin B6 (from garlic)		3.2mg	229
Folic acid (from spinach)		400µg	200
Vitamin B12 (mixed cobalamin from shiitake)		6.5µg	260
Biotin (from sunflower seed kernel)		34µg	68
Pantothenic acid (from shiitake)		4mg	67
Magnesium (from marine source)		60mg	16
Iron (from curry leaf)		3.3mg	24
Zinc (from shiitake)		8.2mg	82
Selenium (from sunflower seed kernel & shiitake)		58.6µg	107
Chromium (from parsley & moringa)		35µg	88
Iodine (from sea kelp)		50µg	33
AstraGin® (astragalus membranaceus root & panax notoginseng root extracts)		35mg	

[†]NRV = Nutrient Reference Value

* Vitamin B12 contributes to normal energy-yielding metabolism
** Zinc contributes to normal cognitive and immune function

HIGHER NATURE®

TRUE FOOD. MADE FROM REAL FOOD.

**True Food Vitality
for Women**

Superior whole food
multivitamin

20 vitamins and minerals plus
scientifically backed AstraGin®

Energy & metabolism* Immunity** Brain**

Natural source, no synthetics
60 vegan capsules

True Food Vitality for Women

- 🌿 Nutrients from 16 real foods
- 🌿 Gentle green extraction of nutrients
- 🌿 With AstraGin® for advanced nutrient absorption†

†A diet including 35mg of AstraGin® per day may support nutrient absorption.

Ingredients: Plant, mushroom and adaptogen extracts blend (amla fruit, sunflower seed kernel, moringa leaf, shiitake mushroom fruiting body, garlic bulb, carrot root, curry leaf, spinach leaf, parsley leaf, coconut aminos, lichen), capsule shell (hydroxypropyl methylcellulose), magnesium hydroxide (marine source), kelp (*ascophyllum nodosum*), extract from *panax notoginseng* and *astragalus membranaceus* (AstraGin®), menaquinone 7 (MK-7) from natto extract.

Directions: Adults take 2 capsules daily with a meal. Do not exceed recommended daily intake. Food supplements should not be used as a substitute for a varied and balanced diet and healthy lifestyle.

Warning: Do not take if you are under 18 years old or pregnant. If you are breastfeeding, taking any medication, (including anti-coagulants [blood thinners]) or have a medical condition, please consult your healthcare professional before using this product.

Storage: Store in a cool, dry place out of reach of children.

AstraGin® is a registered trademark of NuLiv Science USA Inc.

Higher Nature Ltd; (UK) 10 Discovery Way, Horam, East Sussex TN21 0GE, UK
(EU) Office 7, Strand Campus, Sligo Airport Business Park, Strandhill F91 W589, Ireland

Third party tested
for quality assurance

TFVIW-164-01 TFVIW060/101



PRODUCT INFO



The genuine real food supplement

Drawing on 30 years of expertise, Higher Nature True Food® supplements are carefully crafted to help keep you at your best.

Unlike other brands, we're not adding synthetic nutrients to yeast, bacteria or food pastes, we blend together real whole foods such as fruits, vegetables, mushrooms, herbs and seeds in order to create a naturally nutrient rich supplement that works better for you.

As these supplements are derived from real food ingredients your body already recognises, they are more biologically active, delivering their benefits faster than alternatives.

Wholly without synthetics, you can feel assured that your supplements are working in harmony with your body rather than against it, allowing you to live your life to its absolute fullest.

Higher Nature – pioneer of
food-based supplements since 1994.

True Food® is a registered trademark of Higher Nature Ltd.