Request for Scientific Evaluation of Substantial Equivalence Application for the Approval of Chia seeds (*Salvia Hispanica* L.) from The Chia Company for use in bread

by THE CHIA COMPANY



Application submitted by FOOD LAW CONSULTANTS



December 22, 2009

Table of contents

1. SUMMARY	
2. ADMINISTRATIVE INFORMATION	4
3. COMPOSITION	5
3.1. Information on the source organism	
3.2. Production process	5
3.3. Composition of the final product	6
4. NUTRITIONAL VALUE	
4.1. General description of Chia seeds	
4.2. History of use	
5. METABOLISM	12
5.1. Bioavailability	
5.2. Stability of the product	
6. INTENDED USE	14
0. INTENDED USE	
7. LEVEL OF UNDESIRABLE SUBSTANCES	
7.1. Introduction	
7.2. Heavy metals and Chemical contaminants	
7.3. Microbiology	
8. OTHER RELEVANT DATA	
8.1. Toxicity and Safety studies	
8.2. Quality and Hygiene system	
9. CONCLUSION	
10.APPENDIX	
Appendix 1: Flow chart on cultivation, harvesting and storage	
Appendix 2: Composition	
Appendix 3: Comparative test results for the 2006 crop initially tested in July and re- tested in March 2009	
Appendix 4: Certificate of Aminoacids	
Appendix 5: Analytical data on heavy metals	
Appendix 6: Analytical data on mycotoxins	
Appendix 7: Analytical data on microbiological contaminants (I)	
Appendix 8: Analytical data on microbiological contaminants (II)	
Appendix 9: Certificate of compliance with HACCP system	
11.REFERENCES	

1. SUMMARY

This notification dossier is submitted by FOOD LAW CONSULTANTS, S.P.R.L. on behalf of THE CHIA COMPANY pursuant to Article 5 of Regulation (EC) n° 258/97 on novel foods and novel food ingredients (hereinafter, the "**Novel Food Regulation**")¹. It seeks to obtain a scientific evaluation of substantial equivalence for the approval of Chia seeds (*Salvia Hispanica* L.) from THE CHIA COMPANY for use in bread at 5%.

THE CHIA COMPANY is an Australian company owned by three directors who have combined hundred and fifty years agronomic experience in producing food for human consumption including wheat, pumpkins, watermelons and chickpeas.

The use of Chia seeds as a novel food ingredient has been approved by Commission Decision 2009/827/EC of October 13, 2009 granted to COLOMBUS PARADIGM INSTITUTE S.A. (hereinafter, the "Approved Chia")².

Substantial equivalence is sought between the Chia seed of THE CHIA COMPANY (hereinafter, the "**TCC seed**") and the Chia seed manufactured by COLOMBUS PARADIGM INSTITUTE S.A.

The manufacturing process of the TCC seed is similar to that of the Approved Chia. The TCC seed's level of undesirable substances is also similar, and considered safe for human consumption. It is intended to be consumed in a manner identical to the Approved Chia.

In addition, the EUROPEAN FOOD SAFETY AUTHORITY (hereinafter, the "**EFSA**") stated that the compositional data which had been provided on Australian Chia seeds in the framework of the safety assessment of the Approved Chia showed little variety to Chia seeds from the South American countries from which the Approved Chia originates (EFSA, 2009).

This notification dossier follows the "ACNFP guidelines for the presentation of data to demonstrate substantial equivalence between a novel food or food ingredient and an existing counterpart" and provides evidence to confirm that the TCC seed is substantially equivalent to the Approved Chia.

1

Regulation 258/97/EC of the European Parliament and of the Council of 27 January 1997 concerning novel foods and novel food ingredients (OJ L 43, of 14.2.1997, p. 1).

² 2009/827/EC: Commission Decision of 13 October 2009 authorising the placing on the market of Chia seed (*Salvia hispanica*) as novel food ingredient under Regulation (EC) No 258/97 of the European Parliament and of the Council (notified under document C(2009) 7645) (OJ L 294, 11.11.2009, p. 14–15).

FOOD LAW CONSULTANTS Substantial Equivalence – TCC seed January 21, 2010 Page 4 of 72

2. ADMINISTRATIVE INFORMATION

2.1. Applicant

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2.3. Name of Novel Food Ingredient

The Chia seed of THE CHIA COMPANY

2.4. Date of Application

December 22, 2009

3. <u>COMPOSITION</u>

3.1. Information on the source organism

Chia (*Salvia hispanica* L.) is a summer annual herbaceous plant belonging to the Labiatae family. It grows approximately 1-1.2 meters tall. It grows from a seeding to develop lush, green foliage before it produces long flowers similar to lavender which are either purple or, less commonly, white. These flowers develop into seed pods to produce Chia seeds.

Chia seeds were first used as food as early as 3500 BC and were one of the main dietary components of the Aztecs and the Mayans. They were eaten as a grain, drunk as a beverage when mixed with water, ground into flour, included in medicines, pressed for oil and used as a base for face and body paints.

In the 1990s, a research initiative was launched between a North American non profit organisation and a group of South American farmers with the goal of increasing and diversifying commercial production in the region. Chia was selected as part of the cropping program and growing trials proved successful. In the years that followed small scale, commercial production of Chia began.

Today, Chia is grown commercially in several Latin American countries and in Australia.

In Australia, Chia has been recognized as non-traditional, non-novel food by the Novel Food Reference Group of the FOOD STANDARDS AUSTRALIA NEW ZEALAND (hereinafter, the "**FSANZ**").

3.2. Production process

The Chia seed from THE CHIA COMPANY is not processed in any way prior to the use as a food ingredient.

Chia is planted with precision planters into a prepared soil bed to ensure accurate seeding depth and optimal plant density.

It is then fertilised with superphosphate, potassium and nitrogen along with additional trace elements as required maximising crop vigour to produce ideal levels of biomass. Plant tissue tests are taken during the growth stage to ensure the correct nutrition levels are obtained to guarantee the oil yield, Omega 3:6 ratio and levels of protein, fibre, antioxidants, vitamins and minerals.

During crop growth the biomass of the crop is measured with satellite technology imagery to indicate areas of higher or lower biomass levels to allow management to apply corrective nutrition applications. The Chia crop is watered with a gravity fed irrigation system which provides perfect soil moisture levels to guarantee the optimal yield and nutritional profile. Soil moisture data logger probes are positioned in the crop to ensure the soil moisture level is accurately monitored.

Once the Chia seed has developed in the seed head it is mechanically swathed to ensure even ripening and consistent oil yield in the seed and to prevent seed loss through shedding onto the ground.

At harvest, each paddock is harvested and recorded individually and the seed from each paddock, farmer and variety has its identity preserved throughout the cleaning, packing and storage process to ensure complete supply chain traceability.

After harvest, a sample from each lot is collected and tested for a full array of nutritional and residue tests. The seeds are directly sent to the receival point for collation before freighting, temporarily stored on the farm prior to forwarding to the receival point, or transferred to a separate facility for processing in case of breeding stock.

After receival and collation, the seeds are loaded onto road transport and brought to a seed cleaning facility. There, they are transferred to silos for fumigation, cleaned, packed off as finished products and dispatched.

They are fumigated with carbon dioxide (CO₂), a substance which has been authorized as a fumigant as per Council Directive 91/414/EEC of 15 July 1991 concerning the placing of plant protection products on the market³.

As finished products, the seeds may be sent directly to warehouses for storage, directly to customers, or directly for further processing. They may also go to warehouses prior to being sent to customers or to undergo further processing.

A diagram describing in detail this production method is included in Appendix 1.

3.3. <u>Composition of the final product</u>

The relative ratios of micronutrients found in the TCC seed and in the Approved Chia are substantially equivalent, as it can be shown in the following comparative tables.

NUTRIENT		TCC SEED		APPROVED CHIA ⁴	
	IKLENI	Result %	Samples date	Result %	
Dı	ry matter*	95 - 96.8	18/02/2009 06/03/2009 18/05/2009	91 - 96	
]	Protein*	17.4 - 22.4	18/02/2009 06/03/2009 18/05/2009	20 - 22	
	Fat*	28.5 - 34.7	18/02/2009 06/03/2009 18/05/2009	30 - 35	
Car	bohydrate*	37.1 - 42.6	18/02/2009 06/03/2009 18/05/2009	25 - 41	
Fiber	Soluble**	5.3 - 7.1	08/2007	-	
Fit	Insoluble**	30.9 - 33.0	08/2007	18 - 30	
	Ash* 4.5 - 5.6 18/02/2009 06/03/2009 18/05/2009		06/03/2009	4 - 6	

Table 1. Composition of the TCC seed and the Approved Chia

Certificates of analysis are hereby provided as Appendix 2
 Certificates of analysis are hereby provided as Appendix 4

³ OJ L 230, 19.8.1991, p. 1–32.

⁴ As per Commission Decision 2009/827/EC of October 13, 2009

MINERAL	TCC SEED		APPROVED CHIA
	Result (mg/100g)	Samples date	Result (mg/100g)
Sodium	<0.1-6	18/02/2009 06/03/2009 18/05/2009	0,94 - 12,15
Potassium	510 - 710	18/02/2009 06/03/2009 18/05/2009	660 - 809,15
Calcium	500 - 640	18/02/2009 06/03/2009 18/05/2009	557 - 770
Iron	5.7 – 15	18/02/2009 06/03/2009 18/05/2009	6.3 - 9.9
Magnesium	310 - 430	18/02/2009 06/03/2009 18/05/2009	325 - 390
Phosphorus	600 – 870 es of analysis are hereby p	18/02/2009 06/03/2009 18/05/2009	751 - 780

Table 2. Mineral content of the TCC seed and the Approved Chia*

Table 3. Vitamins in the TCC seed and the Approved Chia

VITAMIN	TCC SEED		APPROVED CHIA	
	Result % (mg/100g)*	Samples date	Result (mg/100g)*	
Retinol ** (Vit. A)	16 IU	16/07/2007	44 IU	
Thiamin ** (Vit. B1)	0.79 - 0,81	16/07/2007	0.7 – 0.18	
Riboflavin ** (Vit. B2)	0.05	16/07/2007	0.04 - 0.2	
Niacin ** (Vit. B3)	7.8-9.4	16/07/2007	6.13 -7.2	
Cobalamin ** (Vit B12)	90 – 110 ng	16/07/2007	Unknown	
Ascorbic acid *** (Vitamin C)	<1-6	18/02/2009 06/03/2009 18/05/2009	<3 - 5.4	
Alpha- tocopherol *** (Vit. E)	<0.1 – 0.3	18/02/2009 06/03/2009 18/05/2009	0.74	

* Except for vitamin A and vitamin B12

**

Certificates of analysis are hereby provided as Appendix 3 Certificates of analysis are hereby provided as Appendix 2 ****

protein d - 3.53 08 - 6.34 08	mples date	Result % of protein 3.21 - 3.98 5.89 - 7.30 3.60 - 5.50
-6.34 08	3/2007	5.89 - 7.30
-4.42 08	3/2007	3.60 - 5.50
-1.14 08	3/2007	0.36 - 0.45
-4.71 08	3/2007	4.73 - 5.86
- 3.42 08	3/2007	3.23 - 4.25
- 1.04 08	3/2007	Unknown
	2/2007	5.10 - 6.32
		- 1.04 08/2007 - 4.56 08/2007

Table 4. Aminoacids in the TCC seed and the Approved Chia*

Certificates of analysis are hereby provided as Appendix 4

Table 5. Fatty acid profile in the TCC seed and the Approved Chia

	TCC SEED		APPROVED CHIA	
FATTY ACID	Result %	Samples	Result	
	Kesuit 70	date	(range)	
Total fat*	29 5 24 5	18/02/2009 06/03/2009	20 25	
1 otal fat*	28.5 - 34.7	18/05/2009	30 – 35	
		18/02/2009		
Saturated fat*	2.8 - 4.1	06/03/2009	Unknown	
		18/05/2009		
Mono-unsaturated		18/02/2009		
Fats*	2 – 3 (g/100g)	06/03/2009	Unknown	
1 410		18/05/2009		
Poly-unsaturated	17.8 - 27.8	18/02/2009		
Fats*	(g/100g)	06/03/2009	Unknown	
		18/05/2009		
Trans fats*	<0.1 - 0,1	18/02/2009 06/03/2009	Unknown	
114115 1415	(g/100g)	18/05/2009	Clikitówi	
C06:0 Caproic**	< 0.1	02/03/2009	< 0.01	
C08:0 Caprilic**	< 0.1	02/03/2009	< 0.01	
C12:0 Lauric**	< 0.1	02/03/2009	< 0.01	
C14:0 Myristic**	< 0.1	02/03/2009	< 0.1 - 0.10	
C15:0 Pentadecanoic**	< 0.1	02/03/2009	< 0.01	
C16:0 Palmitic**	7.1	02/03/2009	6.64 - 6.73	
C18:0 Stearic**	3.7	02/03/2009	2.93 - 3.24	
C20:0 Arachidic**	0.3	02/03/2009	< 0.01 – 0.3	
C14:1 Miristoleic**	< 0.1	02/03/2009	< 0.01	
C16:1 Palmitoleic**	0.3	02/03/2009	0.1 – 0.15	
C17:1 Heptadecanoic**	< 0.1	02/03/2009	< 0.01 - 0.1	
C18:1w9 Oleic**	8.7	02/03/2009	6.61 – 7.51	
C20:1w9 Eicosaenoic**	< 0.1	02/03/2009	< 0.01 - 0.1	

FOOD LAW CONSULTANTS Substantial Equivalence – TCC seed January 21, 2010 Page 9 of 72

	TCC SEED		APPROVED CHIA	
FATTY ACID	Result %	Samples date	Result (range)	
C18:2w6 Linoleic**	22.0	02/03/2009	18.64 – 19.6	
C18:3w3 Linolenic**	57.4	02/03/2009	18.7 – 73.8	
C18:3w6 Linolenic**	< 0.1	02/03/2009	< 0.1 - 0.1	
C20:2w6 Eicosadienoic**	< 0.1	02/03/2009	< 0.01 - 0.1	
C20:3w3 Eicosatrienoic**	< 0.1	02/03/2009	0.1	
C20:5w3 Eicosapentaenoic**	< 0.1	02/03/2009	< 0.01	
C22:4 Docosatetraenoic**	< 0.1	02/03/2009	0.1	
C22:5w3 Docosapentaenoic**	< 0.1	02/03/2009	< 0.01 - < 0.1	
C22:6w3 Docosahexaenoic**	< 0.1	02/03/2009	< 0.01	
C24 Lignoceric**	0.1	02/03/2009	< 0.1 - 0.2	

Certificates of analysis are hereby provided as Appendix 2
 Certificates of analysis are hereby provided as Appendix 3

4. <u>NUTRITIONAL VALUE</u>

As shown in Table 1 above, the TCC seed contains about 20 % protein, a level greater than other nutritional grains such as wheat (14 %), corn (14 %), rice (8 %), oats (15 %), barley (9 %), and amaranth (14 %). Chia seeds have an oil content of approximately one third of its weight, about 80 % of which is α -linolenic acid, making this ingredient a source of n-3 fatty acids.

The seeds alone possess about 5 % soluble fiber.

The TCC seeds are also a source of vitamins B, calcium, phosphorous, potassium, zinc, and copper, and contain natural antioxidants (chlorogenic acid, caffeic acid and flavanol glycosides).

4.1. General description of Chia seeds

Chia (*Salvia Hispanica* L.) is an estival growing annual species belonging to the family Labiata that is indigenous to Central and South America, particularly the Rocky Mountains area extending from the Mexican western central area towards northern Guatemala.

Pre-Columbian civilizations, mainly Aztecs, used chia as a raw material for a number of applications, such as in a variety of medicinal and nutritional compounds, and in substances such as paints. Chia was extremely important to Pre-Columbian societies. From the point of view of significance, only corn and beans outweighed it.

Although Chia was originally part of the South and Central American and U.S. Southwest indigenous diet, this changed with colonization and modernization. Today, Mexican Indian descendants still grow Chia on a small scale using rudimentary technological methods, for preparing a popular beverage called "Chia fresca".

4.2. <u>History of use</u>

Salvia hispanica L. is commonly consumed in several countries, including the USA, Canada and Australia, all of which have now a "history of safe use". This "history of safe use" is based on the absence of records of adverse effects, including allergenicity, anti-nutritional or toxic effects for Chia seeds and ground whole Chia intake in the listed countries.

In addition, the detailed data on products including Chia is summarised as follows⁵:

5

Cf. European Food Safety Authority (EFSA)'s Safety of 'Chia seed (*Salvia hispanica*) and ground whole Chia seed' (The EFSA Journal (2009) 996, 15-26).

Table 6. Worldwide overview: Examples of products including Chia seeds or oil

		MONTHLY		
COMPANY NAME	WEBSITE	CONSUMPTIO N	HISTORY	APPLICATIONS
1. USA AN	D CANADA			
Nutraceuticals Holding LLC	www.omega3Chia.com www.researchedproducts.com	1 MT [*] /month	Since 2007	Nutritional Supplement Industry: Chia seeds and Chia oil soft gel caps
Valensa International LLC	www.valensa.com	10 MT/month	Since 2002	Nutritional Supplement Industry:Chia seeds Food Industry: Chia oil (Tresalbio™)
Greensplus	www.greensplus.com	17 MT/month	Since 2007	Nutritional Supplement Industry: Chia seeds Food. Industry: Chia Bars
Nature's Path	www.naturespath.com	1 MT/month	Since 2007	Food Industry: Chia Bars: Dr.Weil [™] Chia Razz [™] Pure Fruit and Nut Bar INGREDIENTS: including organic Chia seeds
Ruth's Hempfood	http://www.ruthshempfoods.com/ Chia.html	1.5 MT/month	Since 2006	Food Industry: Cereal Breakfast
Salba	http://www.sourcealba.com/produ cts.php	300 MT/year	Since 2002	Food Industry: cookies, cereal bars, chips, and seeds (all white Chia seed)
2. MEXICO)			·
Fuentenatura, Mexico	www.fuentenatura.cl	500 kg/ month	Since 2006	Nutritional Supplement Industry: Chia seeds and Chia oil
3. CHILE				
FPT SA. Chile	www.benexia.com	2 MT/month for its final product (Chia seeds growers. 850 MT this year for Food Industry)	Since 2005	Nutritional Supplement Industry: Chia seeds and Chia oil soft gel caps
Empresas Carozzi SA. Chile	www.carozzi.cl	3 MT/month	Since December 2007	Pastas (Chia oil) Cereals Breakfast (Chia seeds)
Others.Chile	www.Chiachile.cl www.supernatural.cl	500 Kg/month	Since 2006	Nutritional Supplement Industry: Chia seeds

4. AUSTRALIA AND NEW ZEALAND					
The Chia Company, AU	www.theChiaco.com.au	MT/month for its final product (Chia Growers.1000 MT this year, for Food Industry) 80 000 units of Chia in 150 g packs have been sold in the past 18 months	Since 2000	Nutritional Supplement Industry: Chia seeds Food Industry in General	
Dovedale Bread.NZ	http://www.dovedalebread.co.n z/index.html	2MT/month	Since 2005	Bakery Industry: Bread with Chia	
Slim Secrets	http://www.slimsecrets.com.au/ cookie_trail_mix.asp	20 kg/month	Since 2009	Cookie snack with Chia	
Fonterra	http://www.fonterra.com	500 kg/month	Since 2009	Yoghurt (dairy)	
Centenary Bakery	http://www.madebybikini.com/	2 MT/month	Since August 2009	Bread	
5. ASIA					
Latina Inc. Japon	http://www.latina-inc.com	2MT/month	Since 2005	Nutritional Supplement	
K-Squares, Korea	http://www.ksquares.com	500 kg/month	Since 2006	Nutritional Supplement	
6. EUROP	EAN UNION				
Naturkost Übelhör GmbH & Co KG.DE	http://www.saChia.de/home.html http://www.shop.saChia.de	Not available	Since 2005	Nutritional Supplement Industry	

* MT (metric ton = 1000 kng)

5. <u>METABOLISM</u>

5.1. Bioavailability

The following studies have investigated the bioavailability of Chia seeds:

AYERZA R and COATES W (2005). Ground Chia seed and Chia oil effects on plasma lipids and fatty acids in rats. Nutrition Research. 25:995-1003.

This study was performed to assess the effect of Chia seed on plasma total cholesterol, highdensity lipoprotein (HDL), low-density lipoprotein, triacylglycerol content, and fatty acid profile when fed to rats. Twenty-four male Wistar rats were fed ad libitum 3 diets containing equal energy levels derived from corn oil (T1), Chia seed (T2), or Chia oil (T3) for four weeks. At the end of the feeding period, 6 rats from each treatment were used for blood analyses. Blood samples were analyzed for total cholesterol, HDL, low-density lipoprotein, triacylglycerol content, and fatty acid composition. Rats fed Chia showed a significant decrease in serum triacylglycerol content, 3 and 2.5 times lower than the control for T2 and T3, respectively. There was a significant increase in serum HDL cholesterol content, 21.8% and 51% for T2 and T3, respectively, with the increase between chia diets being significant (P < 0.05). Total cholesterol was significantly lower for the T2 diet compared with the T3 diet. Serum fatty acid composition showed a significantly higher a–linolenic acid content and an improved ratio of T-6/T-3 fatty acids forT2 and T3 compared with T1. In sum, the chia diets dramatically decreased triacylglycerol levels and increased HDL cholesterol and T-3 fatty acid contents in rat serum.

AYERZA R and COATES W (2000). Dietary levels of Chia: influence on yolk cholesterol, lipid content and fatty acid composition for two strains of hens. Poult. Sci. 79: 724-739.

Four hundred fifty H&N laying hens, half white and half brown, were fed for 90 days to compare a control diet to diets containing 7, 14, 21, and 28% Chia (*Salvia hispanica L.*) seed. Cholesterol content, total fat content, and fatty acid composition of the yolks were determined 30, 43, 58, 72, and 90 days from the start of the trial. Significantly less cholesterol was found in egg yolks produced by the hens fed the diets with 14, 21, and 28% chia compared to control, except at day 90. Palmitic fatty acid content and total satured fatty acid content decreased as chia percentage increased and as the trial progressed. Total omega-3 fatty acid content was significantly greater (P<0.05) than from the control diet. Generally, total PUFA content tended to be highest in the yolks of the white hens.

AYERZA R and COATES W (2002). Dietary levels of Chia: influence on hen weight, egg production and sensory quality, for two strains of hens. Br. Poult. Sci. 43: 283-290.

Four hundred fifty H&N laying hens, half white and half brown, were fed for 90 days to compare a control diet with diets containing 70, 140, 210 and 280 g/kg chia (Salvia hispanica L.) seed. Although hen weight was not significantly affected by diet, manure production was less for the hens fed on Chia. Egg weight and production, yolk weight, and yolk percentage were determined at day 0, 30, 43, 58, 72 and 90. A sensory evaluation was conducted on eggs produced during the last week of the trial. No significant differences in egg production were found among treatments for the brown hens. With the 280 g/kg Chia diet, the white hens produced fewer and lighter eggs than did the hens fed on the control diet. No significant differences were detected in yolk weight until day 90. On this date, the yolks produced by the white hens fed on the 70 g/kg Chia diet were significantly lighter in weight, whereas the brown hens produced significantly heavier yolks, compared with the hens fed on the control diet. Yolk weight as a percentage of egg weight was lower for white hens throughout the trial except on day 58 with the 140 g/kg Chia diet. Significant differences, however, were detected only with the 70 g/ kg Chia diet on day 90 and with the 210 g/kg Chia die on day 58, 72 and 90. No significant differences in taste preference or flavour were found among any of the Chia treatments and the control.

R. AYERZA and W COATES (2006). Influence of Chia on total fat, cholesterol, and fatty acid profile of Holstein cow's milk. Revista Cientifica de la Universidad de Ciencias Empresariales y Sociales, Volumen X - No. 2 - Primavera 2006:40-49.

This feeding trial was conducted with multiparous lactating Holstein cows to determine the effect that feeding Chia (*Salvia hispanica* L.) would have on milk. Total fat, cholesterol, and fatty acid profile were compared between two groups of cows fed a chia supplement, and a control supplement, over a period of 94 days. Milk production was not significantly different (P<0,05) between the two groups of cows. Cholesterol and total fat contents were lower in the milk obtained from the cows fed the Chia diet. However, no significant differences were

detected. Oleic, linoleic and linolenic fatty acids were significantly higher with the Chia diet than with the control diet, as was total polyunsaturated fatty acid. No significant differences in satured fatty acids were detected between treatments. Significantly (P<0,05) lower SFA:PUFA and SFA:n-3 ratios in the milk were found as compared to those of the control diet.

5.2. <u>Stability of the product</u>

The Chia seed is a small round seed with an outer shell that perfectly encapsulates the Omega 3 content. Other oil seeds have a tip on the end which throughout the cleaning and packing process the tip can break off and cause oxidation and rancidity. Chia does not have this tip, so each round seed stays intact and stable.

As part of their hygiene system, THE CHIA COMPANY keeps samples from each crop batch.

In March 2009, THE CHIA COMPANY conducted a routine re-test of the 2006 crop. This three year comparison demonstrates that the nutritional content of the seed has not changed over a three year period. There has been no deterioration in taste or smell and the microbial status remained constant.

The comparative results for the 2006 crop of July 2007 and March 2009 can be found in Appendix 3.

6. <u>INTENDED USE</u>

The TCC seed is intended to be used in bread products at a maximum of 5%. This use has been approved by the European Commission pursuant to Decision 2009/827/EC.

The safety of TCC has also been established for other food uses such as dairy products, snacks and pasta, although the present application is limited to its use in bread.

7. <u>LEVEL OF UNDESIRABLE SUBSTANCES</u>

7.1. Introduction

The applicant's production process ensures that the levels of undesirable substances are well below the specified limits and equivalent to the Approved Chia.

7.2. Heavy metals and Chemical contaminants

The level of heavy metals is below the specified limits.

HEAVY	TCC SEED		APPROVED CHIA
METAL	Result	Samples	Result
	(ppm)	date	(ppm)
Arsenic	<0.1		< 0.1 - < 0.2
Aiseme	(Detection limit: 0.1)		< 0.1 - < 0.2
Co douise a	<0.1	26/02/09	0.018 < 0.2
Cadmium	(Detection limit: 0.1)	tion limit: 0.1) 13/03/09 0.	0.018 - < 0.2
M	<0.01 - <0.02	22/05/09	
Mercury	(Detection limit: 0.02)	08/06/09	< 0.01 - < 0.03
Teed	<0.5 - <1		< 0.004 < 0.12
Lead	(Detection limit: 1)		< 0.004 - < 0.12

Table 7. Analytical data on heavy metals in the TCC seed and the Approved Chia*

* Certificates of analysis are hereby provided as Appendix 5

7.3. Microbiology

The Chia seeds of THE CHIA COMPANY have been tested for pathogenic microorganisms and total viable counts at PROMICRO PTY LTD and at AGRIFOOD TECHNOLOGY, both of which are accredited by the Australian Association of Testing Authorities (NATA), and at the AUSTRALIAN GOVERNMENT NATIONAL MEASUREMENT INSTITUTE.

There were no pathogenic organisms detected and the total viable counts were found low.

NOVOOTOVDIA	TCC SEED	APPROVED CHIA	
MYCOTOXINS	Result (ppb)	Samples date	Result (ppb)
Ochratoxin A	<1	2/10/2009	Not detected (Detection limit: 5)
Aflatoxin B1	<1	2/10/2009	Not detected (Detection limit: 2)
Aflatoxin B2	<1	2/10/2009	Not detected (Detection limit: 4)
Aflatoxin G1	<1	2/10/2009	Not detected (Detection limit: 2)
Aflatoxin G2	<1	2/10/2009	Not detected (Detection limit: 4)
Sum of afl. B1 + B2+ G1+ G2	<5	27/10/2008 10/06/2009	Not detected (Detection limit: 2)
Toxin T-2	<100	2/10/2009	Not detected (Detection limit: 50)
Toxin HT-2	<100	2/10/2009	Not detected (Detection limit: 300)
Fumonisin B1	<250	2/10/2009	Not detected (Detection limit: 100)
Fumonisin B2	<250	2/10/2009	Not detected (Detection limit: 100)
Deoxynivalenol	<250	2/10/2009	Not detected (Detection limit: 200)
Zearalenone	<25	2/10/2009	Not detected (Detection limit: 75)

Table 8. Analytical data on mycotoxins in the TCC seed and the Approved Chia*

Certificates of analysis are hereby provided as Appendix 6

Table 9. Analytical data on microbiological contaminants in the TCC seed and the Approved Chia

	TCC S	APPROVED CHIA		
MYCOTOXINS	Result	Samples date	Result	
Yeasts/g *	<200 CFU/g	4/06/2009	<10 - 1100	
Accredited moulds/g *	<200 CFU/g	4/06/2009	<10 - 1100	
Coagulase Positive Staphylococci / g ***	<100 CFU/g – 200 CFU/g	19/10/2006 21/08/2007	<100 **	
Bacillus cereus/g ***	<100 CFU/g – 200 CFU/g	04/03/2009 05/03/2009 17/02/2009 03/04/2009 20/04/2009 05/05/2009 12/05/2009	04/03/2009 05/03/2009 17/02/2009	<100
Salmonella/25 g ***	Not Detected/25 g			Absent
E. Coli (CFU) ***	<10 CFU/g – 20 CFU/g		Unknown	
Listeria monocytogenes ***	Not Detected/25 g		Unknown	
Clostridium perfringens ***	<100 CFU/g - <200 CFU/g	28/05/2009 14/05/2009	Unknown	

Certificates of analysis are hereby provided as Appendix 7

** Staph. Aureus/g

*** Certificates of analysis are hereby provided as Appendix 8

8. OTHER RELEVANT DATA

8.1. Toxicity and Safety studies

The safety of Chia seeds when used in bread at a maximum of 5% has been confirmed by the EFSA in its opinion adopted on March 13, 2009 (EFSA, 2009).

EFSA's opinion took into consideration a number of trials to assess the nutritional quality of Chia as a feed ingredient, its effects on selected markers of coagulation and immune function in humans, and its potential allergenicity.

The safety of Chia seeds has been further investigated by FERNANDEZ I, VIDUEIROS SM, AYERZA R, COATES W and PALLARO A (FERNANDEZ I and al., 2008). This study was performed to analyse the effect of Chia on some aspects of the immune system such as the thymus and serum IgE concentration. Weanling male Wistar rats (23 d of age) from the Department of Nutrition at the School of Pharmacy and Biochemistry of the University of Buenos Aires, were divided in three groups (6 rats each) that received for one month (g/kg diet): 150 ground Chia seed (T1); 50 Chia oil (T2); no Chia (T3; control group). Diets T1 and T2 were formulated to provide equal quantities of alpha-linolenic acid from the chia. All the experimental diets were iso-energetic, contained (g/kg) 200 protein and 70 oil, and were prepared according to the American Institute of Nutrition guidelines. No significant differences were observed in food intake, body weight, thymus weight, total thymocyte number and IgE levels when Chia was added to experimental diets as seeds (T1) or as oil (T2) when compared with the control (T3). Moreover, no symptoms such as dermatitis, diarrhoea and abnormal animal growth and behaviour were observed. Adding Chia seeds or oil to experimental diets did not produce any of the problems associated with other n-3 fatty acid sources such as flaxseed or marine products, e.g. fishy flavour, weight loss, digestive problems, diarrhoea and allergies.

No safety concerns were identified by the Novel Food Reference Group of the FSANZ.

8.2. Quality and Hygiene system

The applicant has put in place a Quality Management System based on the Codex Hazard Analysis Critical Control Point (HACCP) method developed by the *Codex Alimentarius*. This system describes agreed methods and specifications to maintain effective control, thereby ensuring a high standard of food safety throughout the production process.

The Quality Management System of THE CHIA COMPANY has been designed to meet the requirements of the SFQ (Safe Quality Food) 2000 Code, a HACCP-based international standard focusing on risk assessment and prevention of food recalls and food safety incidents.

A certificate of compliance with the HACCP system is attached in Appendix 9.

9. <u>CONCLUSION</u>

From the above nutritional, safety, bioavailability and toxicological information and considering the history of use presented in Section 4.2 *supra*, it can be concluded that (i) the TCC seed is substantially equivalent to the Approved Chia in the sense of Article 5 of Regulation 258/97 and; (ii) no adverse effects would be expected for consumers who regularly ingest up to 5% of Chia seeds in bread, in the short or long term.

10. APPENDIX

Appendix 1: Flow chart on cultivation, harvesting and storage

Appendix 2: Composition

Appendix 3: Comparative test results for the 2006 crop initially tested in July 2007 and re- tested in March 2009

Appendix 4: Certificate of Aminoacids

Appendix 5: Analytical data on heavy metals

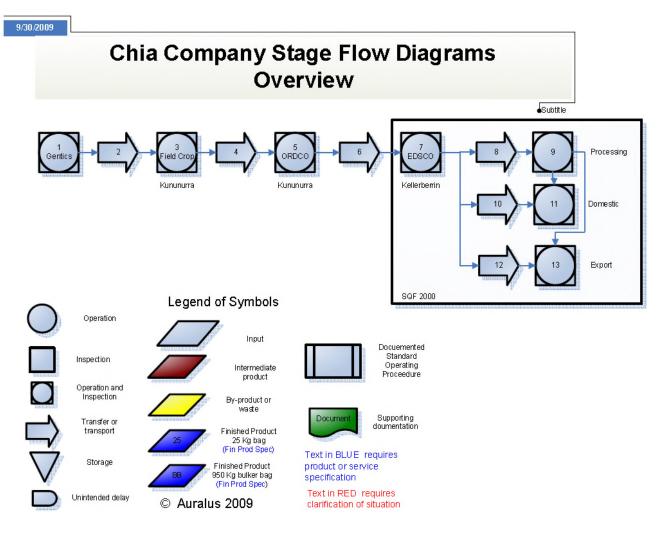
Appendix 6: Analytical data on mycotoxins

Appendix 7: Analytical data on microbiological contaminants

APPENDIX 8: Analytical data on microbiological contaminants (Second part)

Appendix 9: Certificate of compliance with HACCP system

Appendix 1: Flow chart on cultivation, harvesting and storage of the Chia of THE CHIA COMPANY



FOOD LAW CONSULTANTS Substantial Equivalence - TCC seed January 21, 2010 Page 22 of 72

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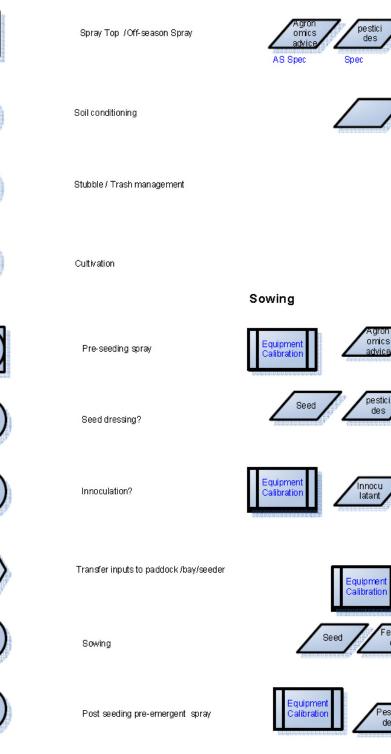
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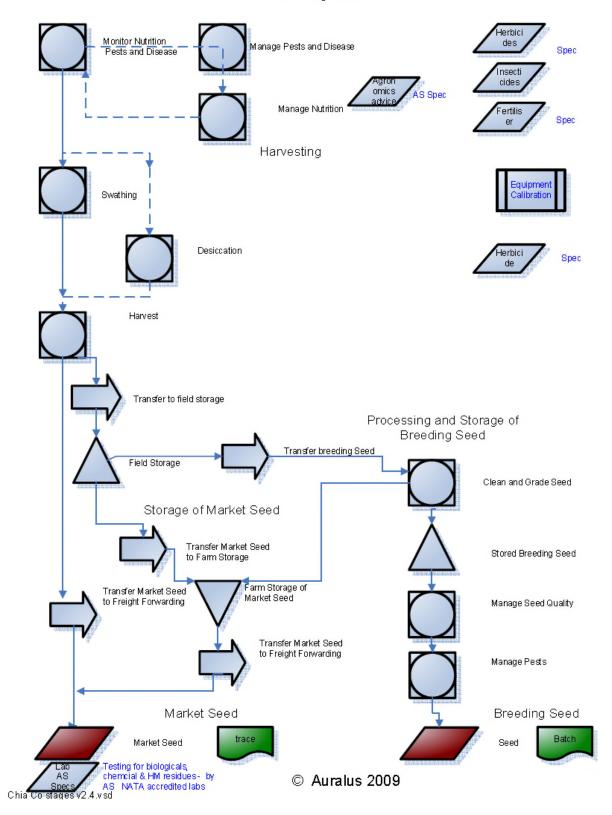
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Chia Costages v2.4.vsd

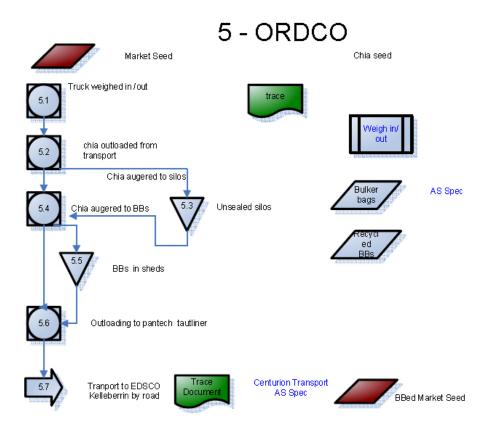
FOOD LAW CONSULTANTS Substantial Equivalence – TCC seed January 21, 2010 Page 23 of 72

Growing - 2

Growing Season

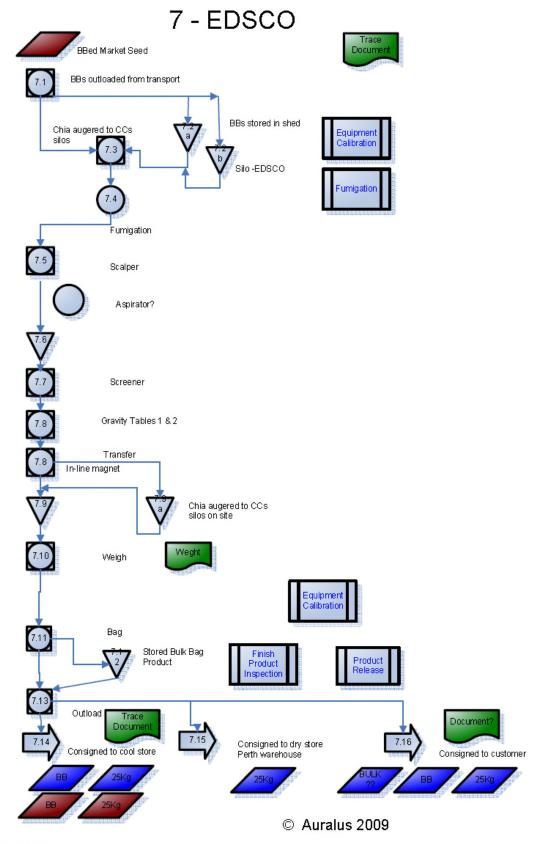


FOOD LAW CONSULTANTS Substantial Equivalence – TCC seed January 21, 2010 Page 24 of 72

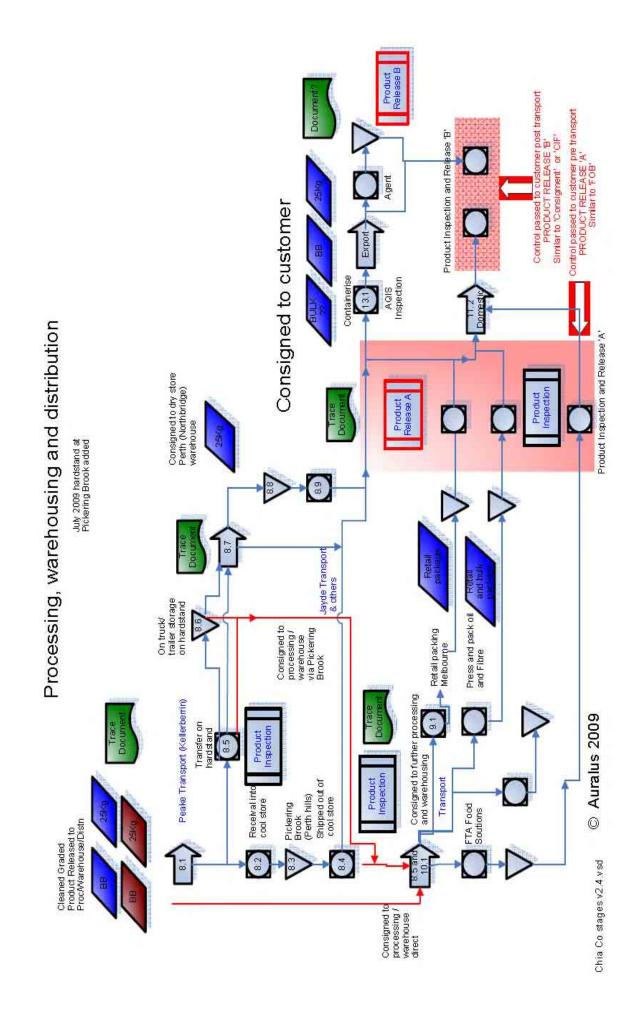


Chia Costages v2.4.v sd

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Chia Costages v2.4.vsd



Appendix 2: Composition of the Chia of THE CHIA COMPANY



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					Page: 1 of 12
					Report No. RN744096
Client	:	CHIA AUSTRALIA PTY LTD	Job No.	;	CHIA01/090219
		SUITE 6	Quote No.	:	QT-01588
		NEWCASTLE MEWS	Order No.	:	
		628 - 630 NEWCASTLE STREET	Date Sampled	:	18-FEB-2009
		LEEDERVILLE WA 6007	Date Received	:	19-FEB-2009
Attention	:	Natasha Jesske	Sampled By	:	CLIENT
Project Name	:				
Your Client Ser	vic	es Manager : Tim Stobaus	Phone	:	(03) 9644 4849

Lab Reg No.	Sample Ref	Sample Description	
V09/004439	09BD022	White Oasis	
V09/004440	09BD023	Black Barradale	
V09/004441	09BD048	White Oasis	
V09/004442	09BD049	Black Oasis	

Lab Reg No.		V09/004439	V09/004440	V09/004441	V09/004442	
Sample Reference		09BD022	09BD023	09BD048	09BD049	1
	Units					Method
Trace Elements						
Calcium	mg/kg	5900	5100	6300	6200	VL247
Iron	mg/kg	150	70	74	61	VL247
Magnesium	mg/kg	3800	3300	3900	3500	VL247
Manganese	mg/kg	53	38	53	34	VL247
Phosphorus	mg/kg	7500	6900	7900	7300	VL247
Potassium	mg/kg	6600	5600	6800	6200	VL247
Sodium	mg/100g	6.0	< 1.0	< 1.0	< 1.0	VL247

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Paul Adorno, Section Manager Inorganics - Vic

6-JUL-2009

Lab Reg No.		V09/004439	V09/004440	V09/004441	V09/004442	
Sample Reference		09BD022	09BD023	09BD048	09BD049	1
	Units					Method
Proximates						
Fructose	g/100g	< 0.2	< 0.2	< 0.2	< 0.2	VL295
Glucose	g/100g	< 0.2	< 0.2	< 0.2	< 0.2	VL295
Sucrose	g/100g	0.3	0.3	0.4	0.3	VL295
Maltose	g/100g	< 0.2	< 0.2	< 0.2	< 0.2	VL295
Lactose	g/100g	< 0.2	< 0.2	< 0.2	< 0.2	VL295
Total Sugars	g/100g	< 1	<1	<1	< 1	VL295
Moisture	g/100g	4.5	4.4	4.5	5.0	VL298
Fat (Mojonnier extraction)	g/100g	34.3	30.9	32.5	30.6	VL302

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FOOD LAW CONSULTANTS Substantial Equivalence – TCC seed January 21, 2010 Page 29 of 72

Lab Reg No.		V09/004439	V09/004440	V09/004441	V09/004442	
Sample Reference	1	09BD022	09BD023	09BD048	09BD049	1
	Units					Method
Proximates						
Saturated Fat	g/100g	3.6	3.2	3.4	3.0	VL289
Protein (Nx5.7)	g/100g	19.4	22.4	20.8	20.0	VL299
Ash	g/100g	5.1	4.8	5.1	5.0	VL286
Carbohydrates	g/100g	2	3	2	5	
Energy (kj)	kJ/100g	1910	1850	1870	1830	
Mono trans fats	g/100g	< 0.1	< 0.1	< 0.1	< 0.1	VL289
Mono-unsaturated fat	g/100g	2.9	2.5	2.7	2.4	VL289
Omega 3 fats	g/100g	20.6	19.1	19.6	18.8	VL289
Omega 6 fats	g/100g	7.1	6.0	6.7	6.2	VL289
Poly trans fats	g/100g	0.1	0.1	0.1	0.1	VL289
Poly-unsaturated fat	g/100g	27.5	24.9	26.2	24.9	VL289
Trans fats	g/100g	0.1	0.1	0.1	0.1	VL289
Saturated Triglycerides in Extra	10 0	-				
C4:0 Butyric	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C6:0 Caproic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C8:0 Caprylic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C10:0 Capric	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C12:0 Lauric	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C14:0 Myristic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C15:0 Pentadecanoic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C16:0 Palmitic	%	6.6	6.8	6.6	6.5	VL289
C17:0 Margaric	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C18:0 Stearic	%	3.6	3.4	3.6	3.2	VL289
C20:0 Arachidic	%	0.3	0.3	0.3	0.3	VL289
C22:0 Behenic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C24:0 Lignoceric	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
Total Saturated	%	10.5	10.5	10.4	9.9	VL289
Mono-unsaturated Triglycerides		1.1.1	10.5	10.4	0.0	46200
C14:1 Myristoleic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C16:1 Palmitoleic	%	0.2	0.2	0.2	0.2	VL289
C17:1 Heptadecenoic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C18:1 Oleic	%	8.1	7.7	8.1	7.6	VL203
C20:1 Eicosenic	%	< 0.1	<0.1	< 0.1	<0.1	VL289
C20:1 Elcosenic C22:1 Docosenoic	%	< 0.1	<0.1	< 0.1	<0.1	VL289
C22:1 Docosenoic C24:1 Nervonic	%	<0.1	<0.1	< 0.1	<0.1	VL289 VL289
	%	8.3	7.9	< 0.1 8.3	7.8	VL289 VL289
Total Mono-unsaturated	1.4	10.0	1.9	0.3	1.8	141289
Poly-unsaturated Triglycerides i	-		19.4	20.5	20.3	1/1 000
C18:2w6 Linoleic	%	20.7				VL289
C18:3w6 gamma-Linolenic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C18:3w3 alpha-Linolenic	7.0	60.0	61.7	60.4	61.4	VL289
C20:2w6 Eicosadienoic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C20:3w6 Eicosatrienoic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289

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FOOD LAW CONSULTANTS Substantial Equivalence – TCC seed January 21, 2010 Page 30 of 72

RE-ISSUED REPORT OF ANALYSIS

Page: 3 of 12

Lab Reg No.		V09/004439	V09/004440	V09/004441	V09/004442	
Sample Reference	1	09BD022	09BD023	09BD048	09BD049	1
	Units					Method
Poly-unsaturated Triglycerides i	in Extracted Fat		-			
C20:4w6 Arachidonic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C20:5w3 Eicosapentaenoic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C22:2w6 Docosadienoic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
Omega 3 Fatty Acids	%	60.0	61.7	60.4	61.4	VL289
Omega 6 Fatty Acids	%	20.7	19.4	20.5	20.3	VL289
C22:4w6 Docosatetraenoic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C22:5w3 Docosapentaenoic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C22:6w3 Docosahexaenoic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
Total Poly-unsaturated	%	80.3	80.7	80.5	81.4	VL289
Total Mono Trans Fatty Acids	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
Total Poly Trans Fatty Acids	%	0.4	0.4	0.4	0.4	VL289
P:M:S Ratio		4.2:8.6:1.0	7.8:0.8:1.0	7.8:0.8:1.0	8.2:0.8:1.0	VL289
Vitamins						
Ascorbic Acid	mg/100g	5.8	5.8	5.0	4.6	VL301
alpha-Tocopherol	mg/100g	0.2	0.3	0.2	0.2	VL291

0 Paul Adorno, Section Manager

Neil Merry

Neil Menz, Analyst

Food Composition - Vic

Sam Barone, Chemist

Organics - Vic

6-JUL-2009

Food Composition - Vic

Lab Reg No.		V09/004439	V09/004440	V09/004441	V09/004442	
Sample Reference	1	09BD022	09BD023	09BD048	09BD049	
	Units					Method
Proximates						
Total Dietary Fibre	g/100g	35.2	34.1	35.1	34.2	

V09/004439

Fibre determined by Agrifood Technology, Werribee Vic. NATA Accred. 2726. Agrifood Report No: 23651

V09/004440

Fibre determined by BRI Research Pty Ltd, North Ryde NSW. BRI Report No: 72224

V09/004441 Fibre determined by Agrifood Technology, Werribee Vic. NATA Accred. 2726. Agrifood Report No: 23651

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FOOD LAW CONSULTANTS Substantial Equivalence – TCC seed January 21, 2010 Page 31 of 72

RE-ISSUED REPORT OF ANALYSIS

Page: 4 of 12 Report No. RN744096

V09/004442 Fibre determined by Agrifood Technology, Werribee Vic. NATA Accred. 2726. Agrifood Report No: 23040

Anne Caple Anne Coyle

Anne Coyle Laboratory Services Unit - Vic

6-JUL-2009

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FOOD LAW CONSULTANTS Substantial Equivalence – TCC seed January 21, 2010 Page 32 of 72

RE-ISSUED REPORT OF ANALYSIS

					Page: 5 of 12
					Report No. RN744096
Client	:	CHIA AUSTRALIA PTY LTD	Job No.	Ŀ,	CHIA01/090219
		SUITE 6	Quote No.	5	QT-01588
		NEWCASTLE MEWS	Order No.	5	
		628 - 630 NEWCASTLE STREET	Date Sampled	:	18-FEB-2009
		LEEDERVILLE WA 6007	Date Received	1:	19-FEB-2009
Attention	:	Natasha Jesske	Sampled By	1	CLIENT
Project Name	:				
Your Client Ser	vic	es Manager : Tim Stobaus	Phone	:	(03) 9644 4849

Lab Reg No.	Sample Ref	Sample Description	
V09/004443	09BD057	White Oasis	
V09/004445	09BD059	White Barradale	
V09/004446	09BD060	Black Bathkamp	
V09/004447	09BD061	Black Oasis	

Lab Reg No.		V09/004443	V09/004445	V09/004446	V09/004447	
Sample Reference		09BD057	09BD059	09BD060	09BD061	1
	Units					Method
Trace Elements						
Calcium	mg/kg	5600	5000	5300	5300	VL247
Iron	mg/kg	65	63	81	61	VL247
Magnesium	mg/kg	4300	3400	3400	3400	VL247
Manganese	mg/kg	44	38	41	34	VL247
Phosphorus	mg/kg	8700	7200	7300	7100	VL247
Potassium	mg/kg	7100	5600	6100	5800	VL247
Sodium	mg/100g	< 1.0	< 1.0	< 1.0	< 1.0	VL247

Jan Harro Paul Adorno, Section Manager

Inorganics - Vic

6-JUL-2009

Lab Reg No.		V09/004443	V09/004445	V09/004446	V09/004447	
Sample Reference		09BD057	09BD059	09BD060	09BD061	1
	Units					Method
Proximates						
Fructose	g/100g	< 0.2	< 0.2	< 0.2	< 0.2	VL295
Glucose	g/100g	< 0.2	< 0.2	< 0.2	< 0.2	VL295
Sucrose	g/100g	0.2	0.5	0.3	0.5	VL295
Maltose	g/100g	< 0.2	< 0.2	< 0.2	< 0.2	VL295
Lactose	g/100g	< 0.2	< 0.2	< 0.2	< 0.2	VL295
Total Sugars	g/100g	<1	<1	<1	<1	VL295
Moisture	g/100g	4.3	4.5	4.1	4.6	VL298
Fat (Mojonnier extraction)	g/100g	33.5	29.0	30.7	28.5	VL302

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FOOD LAW CONSULTANTS Substantial Equivalence – TCC seed January 21, 2010 Page 33 of 72

Lab Reg No.		V09/004443	V09/004445	V09/004446	V09/004447	-
Sample Reference	-	09BD057	09BD059	09BD060	09BD061	
	Units					Method
Proximates						
Saturated Fat	g/100g	3.5	3.1	3.4	3.7	VL289
Protein (N x 5.7)	g/100g	18.1	20.9	19.5	19.0	VL299
Ash	g/100g	5.2	5.2	5.6	5.4	VL286
Carbohydrates	g/100g	3	5	6	6	
Energy (kj)	kJ/100g	1890	1790	1840	1770	
Mono trans fats	g/100g	< 0.1	< 0.1	< 0.1	< 0.1	VL289
Mono-unsaturated fat	g/100g	2.7	2.4	2.7	3.0	VL289
Omega 3 fats	g/100g	20.5	17.5	17.9	20.3	VL289
Omega 6 fats	g/100g	6.7	5.8	6.6	7.7	VL289
Poly trans fats	g/100g	0.1	0.1	0.1	0.1	VL289
Poly-unsaturated fat	g/100g	27.1	23.3	24.4	27.8	VL289
Trans fats	g/100g	0.1	0.1	0.1	0.1	VL289
Saturated Triglycerides in Extr	acted Fat					
C4:0 Butyric	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C6:0 Caproic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C8:0 Caprylic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C10:0 Capric	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C12:0 Lauric	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C14:0 Myristic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C15:0 Pentadecanoic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C16:0 Palmitic	%	6.5	6.7	7.0	6.8	VL289
C17:0 Margaric	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C18:0 Stearic	%	3.5	3.7	3.6	3.4	VL289
C20:0 Arachidic	%	0.3	0.3	0.3	0.3	VL289
C22:0 Behenic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C24:0 Lignoceric	%	< 0.1	< 0.1	0.1	0.1	VL289
Total Saturated	%	10.3	10.7	10.9	10.6	VL289
Mono-unsaturated Triglyceride	s in Extracted	Fat	-	-		
C14:1 Myristoleic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C16:1 Palmitoleic	%	0.2	0.2	0.2	0.2	VL289
C17:1 Heptadecenoic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C18:1 Oleic	%	7.8	8.0	8.5	8.4	VL289
C20:1 Eicosenic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C22:1 Docosenoic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C24:1 Nervonic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
Total Mono-unsaturated	%	8.0	8.2	8.7	8.6	VL289
Poly-unsaturated Triglycerides	in Extracted F	at				
C18:2w6 Linoleic	%	20.1	20.1	21.6	22.2	VL289
C18:3w6 gamma-Linolenic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C18:3w3 alpha-Linolenic	%	61.1	60.5	58.3	58.2	VL289
C20:2w6 Eicosadienoic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C20:3w6 Eicosatrienoic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C20:3w3 Eicosatrienoic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289

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FOOD LAW CONSULTANTS Substantial Equivalence – TCC seed January 21, 2010 Page 34 of 72

RE-ISSUED REPORT OF ANALYSIS

Page: 7 of 12

Lab Reg No.		V09/004443	V09/004445	V09/004446	V09/004447	
Sample Reference	1	09BD057	09BD059	09BD060	09BD061	1
	Units					Method
Poly-unsaturated Triglycerides i	in Extracted Fat		-			
C20:4w6 Arachidonic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C20:5w3 Eicosapentaenoic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C22:2w6 Docosadienoic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
Omega 3 Fatty Acids	%	61.1	60.5	58.3	58.2	VL289
Omega 6 Fatty Acids	%	20.1	20.1	21.6	22.2	VL289
C22:4w6 Docosatetraenoic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C22:5w3 Docosapentaenoic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C22:6w3 Docosahexaenoic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
Total Poly-unsaturated	%	80.9	80.2	79.6	80.0	VL289
Total Mono Trans Fatty Acids	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
Total Poly Trans Fatty Acids	%	0.4	0.4	0.4	0.4	VL289
P:M:S Ratio		7.9:0.8:1.0	7.5:0.8:1.0	7.3:0.8:1.0	7.6:0.8:1.0	VL289
Vitamins						
Ascorbic Acid	mg/100g	5.6	6.0	4.1	4.2	VL301
alpha-Tocopherol	mg/100g	0.2	0.2	0.3	0.3	VL291

0 Paul Adorno, Section Manager

Neil Merry

Neil Menz, Analyst

Food Composition - Vic

Sam Barone, Chemist

Organics - Vic

6-JUL-2009

Food Composition - Vic

Lab Reg No.		V09/004443	V09/004445	V09/004446	V09/004447	
Sample Reference	1	09BD057	09BD059	09BD060	09BD061	
	Units					Method
Proximates						
Total Dietary Fibre	g/100g	36.3	35.1	34.1	36.6	

V09/004443

Fibre determined by Agrifood Technology, Werribee Vic. NATA Accred. 2726. Agrifood Report No: 23040

V09/004445

Fibre determined by Agrifood Technology, Werribee Vic. NATA Accred. 2726. Agrifood Report No: 23651

V09/004446 Fibre determined by Agrifood Technology, Werribee Vic. NATA Accred. 2726. Agrifood Report No: 23040

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FOOD LAW CONSULTANTS Substantial Equivalence – TCC seed January 21, 2010 Page 35 of 72

RE-ISSUED REPORT OF ANALYSIS

Page: 8 of 12 Report No. RN744096

V09/004447 Fibre determined by Agrifood Technology, Werribee Vic. NATA Accred. 2726. Agrifood Report No: 23651

Anne Caple Anne Coyle

Anne Coyle Laboratory Services Unit - Vic

6-JUL-2009

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RE-ISSUED REPORT OF ANALYSIS

					Page: 1 of 8
					Report No. RN740732
Client	:	CHIA AUSTRALIA PTY LTD	Job No.	;	CHIA01/090518
		SUITE 6	Quote No.	:	QT-01588
		NEWCASTLE MEWS	Order No.	:	
		628 - 630 NEWCASTLE STREET	Date Sampled	:	17-MAY-2009
		LEEDERVILLE WA 6007	Date Received	:	18-MAY-2009
Attention	:	Natasha Jesske	Sampled By	:	CLIENT
Project Name	:				
Your Client Se	rvic	es Manager : Tim Stobaus	Phone	:	(03) 9644 4849

Lab Reg No.	Sample Ref	Sample Description	
V09/013099	09BD182	White	
V09/013100	09BD225	Black	
V09/013101	09BD226	Black	
V09/013102	09BD227	White	

Lab Reg No.		V09/013099	V09/013100	V09/013101	V09/013102	
Sample Reference		09BD182	09BD225	09BD226	09BD227	Method
	Units					
Trace Elements					-	
Calcium	mg/kg	6000	6100	5900	5400	VL247
Iron	mg/kg	57	62	73	82	VL247
Magnesium	mg/kg	3100	3400	4000	3900	VL247
Manganese	mg/kg	29	36	49	44	VL247
Phosphorus	mg/kg	6000	6800	8700	8100	VL247
Potassium	mg/kg	5100	5500	6900	6300	VL247
Sodium	mg/100g	< 1	<1	< 1	< 1	VL247

fail formo

Paul Adorno, Section Manager Inorganics - Vic

12-JUN-2009

Lab Reg No.		V09/013099	V09/013100	V09/013101	V09/013102	
Sample Reference		09BD182	09BD225	09BD226	09BD227	Method
	Units					
Proximates						
Fructose	g/100g	< 0.2	< 0.2	< 0.2	< 0.2	VL295
Glucose	g/100g	< 0.2	< 0.2	< 0.2	< 0.2	VL295
Sucrose	g/100g	0.5	0.4	0.7	0.4	VL295
Maltose	g/100g	< 0.2	< 0.2	< 0.2	< 0.2	VL295
Lactose	g/100g	< 0.2	< 0.2	< 0.2	< 0.2	VL295
Total Sugars	g/100g	< 1	< 1	< 1	< 1	VL295
Moisture	g/100g	3.9	3.2	4.1	4.4	VL298
Fat (Mojonnier extraction)	g/100g	33.2	34.2	30.1	27.3	VL302

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FOOD LAW CONSULTANTS Substantial Equivalence – TCC seed January 21, 2010 Page 37 of 72

Lab Reg No.		V09/013099	V09/013100	V09/013101	V09/013102	
Sample Reference	-	09BD182	09BD225	09BD226	09BD227	1
	Units					Method
Proximates						
Saturated Fat	g/100g	3.7	3.7	3.6	3.4	VL289
Protein (N x 5.7)	g/100g	17.4	19.2	19.4	21.3	VL299
Ash	g/100g	4.5	4.7	5.2	4.9	VL286
Carbohydrates	g/100g	4	2	1	4	
Energy (kj)	kJ/100g	1890	1920	1780	1740	
Mono trans fats	g/100g	< 0.1	< 0.1	< 0.1	< 0.1	VL289
Mono-unsaturated fat	g/100g	2.7	2.6	2.7	2.5	VL289
Omega 3 fats	g/100g	18.9	19.9	16.2	14.7	VL289
Omega 6 fats	g/100g	6.6	6.6	6.5	5.6	VL289
Poly trans fats	g/100g	0.1	0.1	0.1	0.1	VL289
Poly-unsaturated fat	g/100g	25.3	26.4	22.5	20.2	VL289
Trans fats	g/100g	0.1	0.1	0.1	0.1	VL289
Saturated Triglycerides in Extr	acted Fat					
C4:0 Butyric	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C6:0 Caproic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C8:0 Caprylic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C10:0 Capric	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C12:0 Lauric	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C14:0 Myristic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C15:0 Pentadecanoic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C16:0 Palmitic	%	7.0	7.1	7.6	7.7	VL289
C17:0 Margaric	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C18:0 Stearic	%	3.7	3.3	3.7	4.4	VL289
C20:0 Arachidic	%	0.3	0.3	0.3	0.3	VL289
C22:0 Behenic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C24:0 Lignoceric	%	0.1	0.1	0.1	0.1	VL289
Total Saturated	%	11.1	10.8	11.8	12.5	VL289
Mono-unsaturated Triglyceride	s in Extracted	Fat				
C14:1 Myristoleic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C16:1 Palmitoleic	%	0.2	0.2	0.3	0.3	VL289
C17:1 Heptadecenoic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C18:1 Oleic	%	8.1	7.6	9.0	9.2	VL289
C20:1 Eicosenic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C22:1 Docosenoic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C24:1 Nervonic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
Total Mono-unsaturated	%	8.4	7.8	9.2	9.4	VL289
Poly-unsaturated Triglycerides	in Extracted F	at	_	_		
C18:2w6 Linoleic	%	20.7	20.3	22.4	21.3	VL289
C18:3w6 gamma-Linolenic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C18:3w3 alpha-Linolenic	%	59.4	60.7	56.2	56.4	VL289
C20:2w6 Eicosadienoic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C20:3w6 Eicosatrienoic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C20:3w3 Eicosatrienoic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289

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FOOD LAW CONSULTANTS Substantial Equivalence – TCC seed January 21, 2010 Page 38 of 72

RE-ISSUED REPORT OF ANALYSIS

Page: 3 of 8

Lab Reg No.		V09/013099	V09/013100	V09/013101	V09/013102	
Sample Reference	1	09BD182	09BD225	09BD226	09BD227	1
	Units					Method
Poly-unsaturated Triglycerides i	in Extracted Fat	1				
C20:4w6 Arachidonic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C20:5w3 Eicosapentaenoic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C22:2w6 Docosadienoic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
Omega 3 Fatty Acids	%	59.4	60.7	56.2	56.4	VL289
Omega 6 Fatty Acids	%	20.7	20.3	22.4	21.3	VL289
C22:4w6 Docosatetraenoic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C22:5w3 Docosapentaenoic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
C22:6w3 Docosahexaenoic	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
Total Poly-unsaturated	%	79.7	80.6	78.3	77.3	VL289
Total Mono Trans Fatty Acids	%	< 0.1	< 0.1	< 0.1	< 0.1	VL289
Total Poly Trans Fatty Acids	%	0.4	0.4	0.4	0.4	VL289
P:M:S Ratio		7.2:0.8:1.0	7.5:0.7:1.0	6.7:0.8:1.0	6.2:0.8:1.0	VL289
Vitamins			-	-		
Ascorbic Acid	mg/100g	5.5	< 1	< 1	<1	VL301
alpha-tocopherol	mg/100g	< 0.1	< 0.1	< 0.1	< 0.1	VL291
beta-tocopherol	mg/100g	< 0.1	< 0.1	< 0.1	< 0.1	VL291
delta-tocopherol	mg/100g	0.2	0.2	0.2	0.2	VL291
gamma-tocopherol	mg/100g	5.7	6.1	6.0	5.3	VL291

V09/013099

-V09/013106 Total Dietary Fibre determined by BRI Research, North Ryde NSW. BRI Report no: 72384

SKNahar

Dr. Nahar Syeda, Analyst

Neil Merry ð

Neil Menz, Analyst

Food Composition - Vic

Sant Barone, Chemist

Organics - Vic

Food Composition - Vic

12-JUN-2009

Lab Reg No.		V09/013099	V09/013100	V09/013101	V09/013102	
Sample Reference		09BD182	09BD225	09BD226	09BD227	1
	Units					Method
Proximates						
Total Dietary Fibre	g/100g	37.4	37.1	39.8	38.1	

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Appendix 3: Comparative test results for the 2006 crop initially tested in July 2007 and re- tested in March 2009



REPORT OF ANALYSIS

	Pa	ige: 1 of 5
	Report No	. RN631454
Client	CHIA AUSTRALIA PTY LTD Job No. : CHIA01/0707	16
	SUITE 6 Quote No. : QT-01406	
	VEWCASTLE MEWS Order No. :	
	528 - 630 NEWCASTLE STREET Date Sampled :	
	EEDERVILLE WA 6007 Date Received : 16-JUL-200	7
Attention	Natasha Jesske Sampled By : CLIENT	
Project Name		
Your Client Ser	s Manager : Tim Stobaus Phone : (03) 9685 1	747

Lab Reg No.	Sample Ref	Sample Description
V07/017430	В	Black Seeds
V07/017431	W	White Seeds

Lab Reg No.		V07/017430	V07/017431	
Sample Reference		в	w	
	Units			Method
Trace Elements				
Calcium	mg/kg	5100	5000	VL247
Iron	mg/kg	64	60	VL247
Magnesium	mg/kg	2900	2900	VL247
Manganese	mg/kg	28	28	VL247
Phosphorus	mg/kg	6000	6200	VL247
Potassium	mg/kg	5300	5200	VL247
Sodium	mg/100g	< 1.0	< 1.0	VL247

V07/017431

for

Paul Adorno, Section Manager Inorganics - Vic

13-AUG-2007

Lab Reg No.		V07/017430	V07/017431	
Sample Reference		в	w	
	Units			Method
Proximates				
Saturated Fat	g/100g	4.0	3.9	VL289
Mono trans fats	g/100g	< 0.1	0.2	VL289
Mono-unsaturated fat	g/100g	3.1	3.2	VL289
Omega 3 fats	g/100g	19.8	19.5	VL289
Omega 6 fats	g/100g	7.3	7.5	VL289
Poly trans fats	g/100g	0.2	0.2	VL289
Poly-unsaturated fat	g/100g	27.2	27.0	VL289

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Page: 2 of 5 Report No. RN631454

VL289

VL289

VL289

VL289

REPORT OF ANALYSIS

Lab Reg No. V07/017430 V07/017431 Sample Reference в w Method Units Proximates 0.3 0.3 VL289 g/100g Trans fats Saturated Triglycerides in Extracted Fat VL289 C4:0 Butyric % < 0.1 < 0.1 C6:0 Caproic % < 0.1 < 0.1 VL289 C8:0 Caprylic % < 0.1 < 0.1 VL289 96 < 0.1 VL289 C10:0 Capric < 0.1< 0.1 < 0.1 VL289 C12:0 Lauric % C14:0 Myristic % < 0.1 < 0.1 VL289 C15:0 Pentadecanoic % < 0.1 < 0.1 VL289 C16:0 Palmitic % 7.3 7.2 VL289 C17:0 Margaric < 0.1 % < 0.1 VL289 C18:0 Stearic % 3.9 3.9 VL289 C20:0 Arachidic % 0.3 0.3 VL289 VL289 C22:0 Behenic % < 0.1 < 0.1 < 0.1 < 0.1 VL289 C24:0 Lignoceric % Total Saturated % 11.5 11.4 VL289 Mono-unsaturated Triglycerides in Extracted Fat C14:1 Myristoleic < 0.1 < 0.1 VL289 % 0.2 0.2 VL289 C16:1 Palmitoleic % C17:1 Heptadecenoic VL289 % < 0.1 < 0.1 C18:1 Oleic % 8.7 9.0 VL289 VL289 C20:1 Eicosenic 95 0.1 0.1 C22:1 Docosenoic % < 0.1 < 0.1 VL289 C24:1 Nervonic 95 < 0.1 VL289 < 0.19.3 Total Mono-unsaturated % 9.1 VL289 Poly-unsaturated Triglycerides in Extracted Fat VL289 C18:2w6 Linoleic 21.3 21.9 96 C18:3w6 gamma-Linolenic < 0.1 < 0.1 VL289 % 57.7 C18:3w3 alpha-Linolenic % 56.9 VL289 C20:2w6 Eicosadienoic < 0.1 < 0.1 VL289 % C20:3w6 Eicosatrienoic % < 0.1 < 0.1 VL289 VL289 C20:3w3 Eicosatrienoic % < 0.1 < 0.1 C20:4w6 Arachidonic % < 0.1 < 0.1 VL289 C20:5w3 Eicosapentaenoic % < 0.1 < 0.1 VL289 < 0.1 VL289 C22:2w6 Docosadienoic 96 < 0.1 Omega 3 Fatty Acids % 57.7 56.9 VL289 Omega 6 Fatty Acids 96 21.3 21.9 VL289 C22:4w6 Docosatetraenoic % < 0.1 < 0.1 VL289

 Total Poly Trans Fatty Acids
 %
 0.6
 0.6
 VL289

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 VL289

< 0.1

< 0.1

78.8

0.2

< 0.1

< 0.1

79.0

0.2

C22:5w3 Docosapentaenoic

Total Mono Trans Fatty Acids

C22:6w3 Docosahexaenoic

Total Poly-unsaturated

%

%

%

%

REPORT OF ANALYSIS

						Page: 3 of 5
					Report N	No. RN631454
Lab Reg No.		V07/017430	V07/017431			
Sample Reference		в	w			
	Units					Method
Poly-unsaturated Triglycerides in Extracted Fat						
P:M:S Ratio		6.9:0.8:1.0	6.9:0.8:1.0			VL289

Sam Barene, Chemist Organics - Vic

13-AUG-2007

Lab Reg No.		V07/017430	V07/017431			
Sample Reference		в М	w			
	Units					Method
Allergens						
Gluten (Wheat Protein) Residue		ND	ND			VL356

ND = Not Detected.

V07/017430 to V07/017431

Method: Biokits Gluten Assay Limit of reporting (semi-quantitative): 3 ppm (mg/kg)

-glande A cott

Glenda Scott, Analyst Microbiology - Vic

13-AUG-2007

Lab Reg No.		V07/017430	V07/017431	
Sample Reference		в	w	
	Units			Method
Proximates				
Fructose	g/100g	0.2	0.2	VL295
Glucose	g/100g	0.3	0.3	VL295
Sucrose	g/100g	0.4	0.4	VL295
Maltose	g/100g	< 0.2	< 0.2	VL295
Lactose	g/100g	< 0.2	< 0.2	VL295
Moisture	g/100g	6.3	6.4	VL298
Total Sugars	g/100g	<1	<1	VL295

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REPORT OF ANALYSIS

Page: 4 of 5 Papert No. RN631454

Lab Reg No.		V07/017430	V07/017431	
Sample Reference	в	w		
	Units			Method
Proximates				
Fat (Mojonnier extraction)	g/100g	34.4	34.2	VL302
Protein (N x 6.25)	g/100g	20.4	20.8	VL299
Ash	g/100g	4.5	4.6	VL286
Carbohydrates	g/100g	< 1	< 1	
Energy (kj)	kJ/100g	1930	1920	
Starch		ND*	ND*	BRIS6
Total Dietary Fibre	g/100g	38.3	38.0	
Vitamins				
Ascorbic Acid	mg/100g	1.8	1.3	VL301
Thiamin	mg/100g	0.79	0.81	VL290
Riboflavin (Vitamin B2)	mg/100g	0.05	0.05	VL290
Niacin (Vitamin B3)	mg/100g	9.4	7.8	VL293
Retinol (Vitamin A)	ug/100g	< 5	< 5	VL287
alpha-Tocopherol	mg/100g	0.23	0.28	VL291
Cobalamin (B12)	ng/100g	90	110	
ORAC_Vit C Equivalence	umol/kg	135000	134000	VL370
ORAC_Vit E Equivalence	umol/kg	103000	102000	VL370
Total Folates	ug/100g	90	70	
Outsourced Tests				
Tryptophan	mg/g	2.14	1.83	
Miscellaneous				
Amino Acid Screen		148.63	143.71 m	
Insoluble Dietary Fibre	g/100g	33.0	30.9	
Soluble Fibre	g/100g	5.3	7.1	
Total Polyphenols	mg/kg	3000	3000	VL369

V07/017430

Comment : Total Polyphenols in samples V07/017430 and V07/017431 are expressed as Gallic Acid. : Following folate results were tested and given by Royal Perth Hospital. Ref No: 326183

Cobalamin results determined by RPH - Ref: 326186-187

Total, Insoluble and Soluble Dietary Fibre results determined by BRI - Refs: N4609 and N4610

Quantitative Amino Acid Analysis (Total*) results determined by APAF

Tryptophan result (mg/g)* determined by APAF

Calculation based on amino acid residue mass in protein (molecular weight minus H2O)

Total Starch % results (Not Detected) determined by BRI Research - Refs: N4609-4610*

*Detection Limit: Less than 0.1%

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FOOD LAW CONSULTANTS Substantial Equivalence – TCC seed January 21, 2010 Page 44 of 72

REPORT OF ANALYSIS

Page: 5 of 5 Report No. RN631454

V07/017431 Folate results determined by RPH - Refs: 326182-183

Paul Adorno, Section Manager Food Composition - Vic

Norbert Strobel, Analyst Food Composition - Vic

13-AUG-2007

Neil Merry

Neil Menz, Analyst Food Composition - Vic

Tanya Casey

Laboratory Services Unit - Vic

SKDahar

RN629413

Dr. Nahar Syeda, Analyst Food Composition - Vic

Results relate only to the sample(s) tested. This Report supersedes reports: RN628162

RN629596 RN631263

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Australian Government

National Measurement Institute

REPORT OF ANALYSIS

		Page: 1 of 3
		Report No. RN727379
Client	: CHIA AUSTRALIA PTY LTD	Job No. : CHIA01/090302
	SUITE 6	Quote No. : QT-01588
	NEWCASTLE MEWS	Order No. :
	628 - 630 NEWCASTLE STRE	T Date Sampled : 2-MAR-2009
	LEEDERVILLE WA 6007	Date Received : 2-MAR-2009
Attention	: April Helliwell	Sampled By : CLIENT
Project Name	:	
Your Client S	ervices Manager : Tim Stobaus	Phone : (03) 9644 4849
	-	
Lab Reg No.	Sample Ref	Sample Description

Lab neg No.	Sample Net	Sample Description
V09/004951	1	Chia Seed

Lab Reg No.		V09/004951				
Sample Reference		1				
	Units					Method
Trace Elements						
Sodium	mg/100g	< 1.0				VL247

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Paul Adorno, Section Manager Inorganics - Vic

17-MAR-2009

Lab Reg No.		V09/004951	
Sample Reference		1	
	Units		Method
Proximates			
Fructose	g/100g	< 0.2	VL295
Glucose	g/100g	< 0.2	VL295
Sucrose	g/100g	< 0.2	VL295
Maltose	g/100g	< 0.2	VL295
Lactose	g/100g	< 0.2	VL295
Total Sugars	g/100g	< 1	VL295
Moisture	g/100g	5.4	VL298
Fat (Mojonnier extraction)	g/100g	34.3	VL302
Saturated Fat	g/100g	3.9	VL289
Protein (N x 5.7)	g/100g	20.1	VL299
Ash	g/100g	4.5	VL286
Carbohydrates	g/100g	36	
Energy (kj)	kJ/100g	2220	
Mono trans fats	g/100g	< 0.1	VL289
Mono-unsaturated fat	g/100g	3.1	VL289
Omega 3 fats	g/100g	19.7	VL289
Omega 6 fats	g/100g	7.5	VL289

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Page: 2 of 3

REPORT OF ANALYSIS

Report No. RN727379 V09/004951 Lab Reg No. Sample Reference Units Method Proximates 0.2 VL289 Poly trans fats g/100g Poly-unsaturated fat g/100g 27.1 VL289 Trans fats g/100g 0.2 VL289 Saturated Triglycerides in Extracted Fat VL289 C4:0 Butyric % < 0.1 C6:0 Caproic < 0.1 VL289 % C8:0 Caprylic % < 0.1 VL289 < 0.1 VL289 C10:0 Capric % C12:0 Lauric % < 0.1 VL289 C14:0 Myristic % < 0.1 VL289 C15:0 Pentadecanoic < 0.1 VL289 % C16:0 Palmitic % 7.1 VL289 < 0.1 C17:0 Margaric 96 VL289 3.7 VL289 C18:0 Stearic % C20:0 Arachidic % 0.3 VL289 VL289 C22:0 Behenic % 0.1 C24:0 Lignoceric % 0.1 VL289 % 11.4VL289 Total Saturated Mono-unsaturated Triglycerides in Extracted Fat C14:1 Myristoleic % < 0.1 VL289 VL289 C16:1 Palmitoleic % 0.3 C17:1 Heptadecenoic < 0.1 VL289 % 8.7 C18:1 Oleic % VL289 C20:1 Eicosenic % < 0.1 VL289 C22:1 Docosenoic % < 0.1 VL289 C24:1 Nervonic < 0.1 VL289 % Total Mono-unsaturated % 8.9 VL289 Poly-unsaturated Triglycerides in Extracted Fat VL289 C18:2w6 Linoleic 22.0 % C18:3w6 gamma-Linolenic < 0.1 VL289 % C18:3w3 alpha-Linolenic 57.4 96 VL289 C20:2w6 Eicosadienoic < 0.1 VL289 % C20:3w6 Eicosatrienoic % < 0.1 VL289 < 0.1 C20:3w3 Eicosatrienoic % VL289 C20:4w6 Arachidonic < 0.1 VL289 % C20:5w3 Eicosapentaenoic % < 0.1 VL289 C22:2w6 Docosadienoic < 0.1 VL289 % Omega 3 Fatty Acids % 57.4 VL289 Omega 6 Fatty Acids 22.0 VL289 96 VL289 C22:4w6 Docosatetraenoic % < 0.1 C22:5w3 Docosapentaenoic % < 0.1 VL289 C22:6w3 Docosahexaenoic < 0.1 VL289 % Total Poly-unsaturated 79.0 VL289 %

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REPORT OF ANALYSIS

			 	Page: 3 of 3
				No. RN72737
Lab Reg No.		V09/004951		
Sample Reference	1	1		1
	Units			Method
Poly-unsaturated Triglycerides i	n Extracted Fat			
Total Mono Trans Fatty Acids	%	< 0.1		VL289
Total Poly Trans Fatty Acids	%	0.4		VL289
P:M:S Ratio		7.0:0.8:1.0		VL289

SKDahar

Neil Merry

Neil Menz, Analyst

Food Composition - Vic

Barone, Chemist Sant

Organics - Vic

Dr. Nahar Syeda, Analyst Food Composition - Vic

land 6

Paul Adorno, Section Manager Food Composition - Vic

17-MAR-2009

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Appendix 4: Certificate of Aminoacids

FOOD LAW CONSULTANTS Substantial Equivalence – TCC seed January 21, 2010 Page 49 of 72



Australian Government - National Measurement Institute Report of Analysis - August 2007

		100 grams		15 gran	n serve
	Unit	Black	White	Black	White
Trace Elements				-	
Calcium	mg/100g	510	500	76.5	75.0
Iron	mg/100g	6.4	6.0	1.0	0.9
Magnesium	mg/100g	290	290	43.5	43.5
Manganese	mg/100g	2.8	2.8	0.4	0.4
Phosphorus	mg/100g	600	620	90.0	93.0
Potassium	mg/100g	530	520	79.5	78.0
Sodium	mg/100g	<1.0	<1.0	<1.0	<1.0

Part harris toring Intergenics - Vic.

Fatty Acid Profile					
Total Fat	g/100g	34.40	34.20	5.16	5.13
% total fat	8	100	100	100	100
Saturated Fats	g/100g	4.0	3.9	0.6	0.6
% of total fat	*	11.5	11.4	11.5	11.4
Mono-unsaturated Fats	g/100g	3.1	3.2	0.5	0.5
% of total fat		9.1	9.3	9.1	9.3
Poly-unsaturated Fats	g/100g	27.2	27.0	4.1	4.1
% of total fat	8	79.0	78.8	79.0	78.8
Omega 3 Fats - Alpha Linolenic Acid	g/100g	19.8	19.5	3.0	2.9
% of total fat		57.7	56.9	57.7	56.9
Omega 6 Fats - Linolenic Acid	g/100g	7.3	7.5	1.1	1,1
% of total fat	*	21.3	21.9	21.3	21.9
Trans Fats	g/100g	0.3	0.3	0.0	0.0
% of total fat	x	0.9	0.9	0.9	0.9
Sar Barren Organica - Vic					
Allergens		1			
Gluten Residue		Not detected	Not detected	Hot detected	Not detected
Starch		Not detected	Not detected	Not detected	Not detected
glande Death			an shekarar na k	ala ke bi dina ƙwalatan	
Glanda Scott, Analyst Mcsobiology - Vic					

Suite 6 Newcastle Mews, 628-630 Newcastle St, Leedenville 6007, PO Box 105, Leedenville 6902 Western Australia Ph +61 II 922II 2215, Fx +61 II 922II 1520 mail@thechiaco.com.au www.thechiaco.com.au

FOOD LAW CONSULTANTS Substantial Equivalence – TCC seed January 21, 2010 Page 50 of 72



Australian Government - National Measurement Institute Report of Analysis - August 2007

		100 gra	m	15 gran	n serve
	Unit	Black	White	Black	White
Proximates					
Moisture	g/100g	6.3	6.4	0.9	1.0
Protein	g/100g	20.4	20.8	3.1	3.1
Ash	g/100g	4.5	4.6	0.7	0.7
Carbohydrates	g/100g	<1	<1	<1	<1
Energy (kj)	kj/100g	1930	1920	289.5	288
Total Sugars	g/100g	<1	<1	<1	<1
Dietary Fibre	g/100g	38.3	38.0	5.7	5.7
Insoluble Fibre	g/100g	33.0	30.9	5.0	4.6
Soluble Fibre	g/100g	5.3	7.1	0.8	1.1
Folate	ug/100g	90	70	13.5	10.5
Vitamins					
Rentinol (Vitamin A)	ug/100g	<5	<5	<5	<5
Thiamin (Vitamin B1)	mg/100g	0.79	0.81	0.1	0.1
Riboflavin (Vitamin B2)	mg/100g	0.05	0.05	0.0	0.0
Niacin (Vitamin B3)	mg/100g	9.4	7.8	1.4	1.2
Cobalamin (Vitamin B12)	ng/100g	90	110	13.5	16.5
Absorbic Acid (Vitamin C)	mg/100g	1.8	1.3	0.3	0.2
Alpha-Tocopherol (Vitamin E)	mg/100g	0.23	0.28	0.0	0.0
Antioxidants ORAC Value (Vitamin E Equivalence)	umol/100g	10300	10200	1545	1530
Essential Amino Acids					
(Molecular weight minus H _i O)					
Isoleucine	mg/100g	623	722	93.5	108.3
Leucine	mg/100g	1117	1295	167.6	194.3
Lysine	mg/100g	791	903	118.7	135.5
Methionine	mg/100g	205	233	30.8	35.0
Phenylalanine	mg/100g	856	961	128.4	144.2
Threonine	mg/100g	592	698	88.8	104.7
Tryptophan	mg/100g	214	183	32.1	27.5
Valine	mg/100g	788	931	118.2	139.7
PILLO		Neil Merry	r i	30	1-
Fast Adumi, Section Manager Food Companition - Vie		Neil Menz, Analyss Food Composition - Vic	5	Tanya Casay Laboratory Servi	🔾 ans that - Vic
Berty		SKDahar			
Norbert Strobel, Analyst Feed Campeshian - Vic		Dr. Nahar Syeda, Analyst Food Composition - Vic			

Suite 6 Newcastle Mews, 628-630 Newcastle St, Leederville 6007, PO Box 105, Leederville 6902 Western Australia Ph +61 8 9228 2215, Fx +61 8 9228 1520 mail@thechiaco.com.au www.thechiaco.com.au

Appendix 5: Analytical data on heavy metals

FOOD LAW CONSULTANTS Substantial Equivalence – TCC seed January 21, 2010 Page 52 of 72

		The Child Company APU, Late New 2009-20 26 Treasury 2002	in .	
Metala Data Prepara Data Analysi ARL Lab No	ed 18.622000 ed 18.622000, 25.822000	2001 3002	1 300 1	
Earryle Morks Arseniz Cistorium	Detection Limit mg/sil 8.1 2.1	mg/bgc mg/bgc -mg/bgc -mg/bgc -<.51 -<.61 -<.01 -<.01	0000057 	
Chronikan Copper Macoury Nijbai Least Zine	0.0 0.0 0.0 0.0 0.0 0.0 0.0	4.01 4.0.0 4.01 4.0.0 4.02 21 4.0.02 21 4.0.02 4.0.00 4.0.02 4.0.00 4.0.02 4.0.00 4.0.02 4.0.0 4.0.00 4.000 4.00 4.000 4.000 4.000 4.00000000	- 0-0 - 490 - 10-000 	
Popi S.H.S.				

The Chia Company ARL Lab No: 7492 06 May 2009

Metals

Date Prepared 20/04/2009 Date Analysed 21/04/2009, 23/04/2009

ARL Lab No	Method	7492	
Sample Marks	Detection	09BD182	
	mg/kg	mg/kg	
Arsenic	0.1	< 0.1	
Cadmium	0.1	< 0.1	
Chromium	0.5	< 0.5	
Copper	0.5	16	
Mercury	0.02	< 0.02	
Nickel	0.5	0.8	
Lead	0.5	< 0.5	
Zinc	0.5	38	

Page 5 of 5

FOOD LAW CONSULTANTS Substantial Equivalence – TCC seed January 21, 2010 Page 54 of 72

F	ARL Lati No Sample Marks	Method Detection	9157
		Limit	
	Arsenic	0.4 gmbill	mghg < 0.1 × 0.1
	Cadmlum	0.1	4.0.1
1	Chromium Copper Mercury	0.5 0.5 0.01	20
F	Mercury Nickaf	0.01	< 0.01 0.8
- E	Lead	0.0	<05 -07
L	Zinc	0.0	

Appendix 6: Analytical data on mycotoxins

FOOD LAW CONSULTANTS Substantial Equivalence – TCC seed January 21, 2010 Page 56 of 72



ANALYSIS REPORT

he Chia Company 90 Box 105	ATTENTION FAX NUMBER	Natasha Jesske 08 9228 1520	
28 - 630 Newcastle Street eederville Western Australia 6902	PURCHASE ORDER PROJECT NUMBER	Rec: 21/9/09 J0909-0400	
DATE RECEIVED OUR SAMPLE NUMBER YOUR REFERENCE SAMPLE TYPE	09BD182		
TEST	* 200D	Result	
Fumonisin (TP/)			
Fumonisin B1 (ppm)		<0.25	
Fumonisin B2 (ppm)		<0.25	
LCMS Mycotoxin Screen (TP/315)			
Aflatoxin B1 (ppm)		<0.0010	
Aflatoxin B2 (ppm)		<0.0010	
Aflatoxin G1 (ppm)		<0.0010	
Aflatoxin G2 (ppm)		<0.0010	
Deoxynivalenol (ppm)		<0.25	
HT2 (ppm)		<0.1	
Nivalenol (ppm)		<0.25	
T2 (ppm)		<0.1	
Zearelenone (ppm)		<0.025	
Ochratoxin - HPLC (TP/295)			
Ochratoxin (ppb)		<1	

Note: All samples are analysed on an as received basis. This report is not to be reproduced except in full. TP refers to the technical procedure used to conduct the analysis.

Final Report

Report Number: 26802

Report Number: 26802 Insued: 02 Oct 2009

Fage 1 of 3

Australian Wool Testing Authority Ltd - Trading as Agrifood Technology Pty Ltd. ABN 43 006 014 106 260 Princes Highway, PO Box 728, Werribee Victoria 3030 Freecall 1800 801 312 Telephone 03 9742 0555 Facsimile 03 9742 4228 www.agrifood.com.au

FOOD LAW CONSULTANTS Substantial Equivalence – TCC seed January 21, 2010 Page 57 of 72



ANALYSIS REPORT

 The Chia Company
 ATTENTION
 Natasha Jesske

 PO Box 105
 FAX NUMBER
 08 9228 1520

 628 - 630 Newcastle Street
 PURCHASE ORDER
 Rec: 21/9/09

 Leederville Western Australia 6902
 PROJECT NUMBER
 J0909-0400

20

Garrv Buoden Team Leader. Food Safetv Laboratorv 02 October 2009

Report Number: 26802 Issued: 02 Oct 2009

Page 2 of 3

Australian Wool Testing Authority Ltd - Trading as Agrifood Technology Pty Ltd ABN 43 006 014 106 260 Princes Highway, PO Box 728, Wernbee Victoria 3030 Freecall 1800 801 312 Telephone 03 9742 0555 Facsimile 03 9742 4228 www.agnfood.com.au

FOOD LAW CONSULTANTS Substantial Equivalence - TCC seed January 21, 2010 Page 58 of 72



ANALYSIS REPORT ATTENTION Natasha Jesske The Chia Company FAX NUMBER 08 9228 1520 PO Box 105 628 - 630 Newcastle Street PURCHASE ORDER Rec: 21/9/09 Leederville Western Australia 6902 PROJECT NUMBER J0909-0400 21 September 2009 DATE RECEIVED OUR SAMPLE NUMBER \$2009-14147 YOUR REFERENCE 09BD225 SAMPLE TYPE Seed TEST Result Fumonisin (TP/) Fumonisin B1 (ppm) <0.25 Fumonisin B2 (ppm) < 0.25 LCMS Mycotoxin Screen (TP/315) <0.0010 Aflatoxin B1 (ppm) Aflatoxin B2 (ppm) <0.0010 Aflatoxin G1 (ppm) <0.0010 Aflatoxin G2 (ppm) <0.0010 Deoxynivalenol (ppm) <0.25 HT2 (ppm) <0.1 Nivalenol (ppm) <0.25 T2 (ppm) <0.1 Zearelenone (ppm) <0.025 Ochratoxin - HPLC (TP/295) Ochratoxin (ppb) <1

Note: All samples are analysed on an as received basis. This report is not to be reproduced except in full. TP refers to the technical procedure used to conduct the analysis.

Final Report

Report Number: 26802

Garry Bugden Team Leader. Food Safety Laboratory 02 October 2009

Report Number: 26802 Issued: 02 Oct 2009

Page 3 of 3

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Appendix 7: Analytical data on microbiological contaminants (I)

FOOD LAW CONSULTANTS Substantial Equivalence – TCC seed January 21, 2010 Page 60 of 72

ProMicro Pty Ltd ABN 47 009 120 549 PO Box 181. Hillarys Western Australia 6923 31 Green Road, Hillarys Ph: (+618) 9401 5699 Fax: (+618) 9401 5900 A/h: (+618) 9295 1767 Mobile: 0414 295 176 Email: admin@promicro.com.au



"Science with Ethics"

Attention: Natasha The Chia Company PO Box 105 LEEDERVILLE WA 6902

Certificate of Microbiological Analysis

Lab. No:	P0912990	Date Sample Taken:	4/06/2009	
		Date Received in Lab:	4/06/2009	
Sample Type:	Food	Temp. when Received:	0	
Sample:	09BD022 White			

Test(s) Performed	Test Result(s)	ProMicro Manual	
Yeasts	<200 CFU/g	PMM 2.9	
Moulds	<200 CFU/g	PMM 2.9	

Analyst: wh

AUTHORISED SIGNATORY:

ALAND

DATE REPORTED :

10/06/2009

<= less than; >= greater than ^ = exponential



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The data persons solely to the analytical and sampling procedures used and the condition and homogenity of the samples as received. The data therefore may not be representative of the lot or tatch or other samples. Consequently the data may not received if the condition and homogenity of the samples are not used or any not be represented as the representative of the lot or tatch or other samples. Consequently, the data may not received if is the responsibility of the claim to provide all information selevant to analysis requested. Changes occur in the bacterial content of toological samples. Samples insoluble examined as soon as possible after coefficience of a lot or batch, a product test 4 degrees cellsave or below. Samples tested after 24 his connot be regarded as satisfactory because of terrelative abuse and variations (eg. stressed): Appendix 8: Analytical data on microbiological contaminants (II)

FOOD LAW CONSULTANTS Substantial Equivalence – TCC seed January 21, 2010 Page 62 of 72

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	Attention: SAM	"Science with Eth		nebucimental Microbio
	The Chia Company Suite 6, Newcastle Me 628-630 Newcastle St			
	LEEDERVILLE	WA 6007		
		artificate of Microbiolo	gical Analysis	
Lab. No: Sample Type: Sample:	P0903769 Food 098022 Chia Seed		Date Sample Taken: Date Received in Lab: Temp, when Received:	17/02/2009 17/02/2009 0
Test(s) Perform	ed	Test Result(s)	ProMicro I	Manual
Standard Plate	Count	<400 CFU/g	PMM 2.1	
Coliforms (CFU)	<20 CFU/g	PMM 2.2	
E.Cali (CFU)	100 million (1990)	<20 CFU/g	PMM 2.3	
Coegulase Pos	tive Staphylococci	<200 CFU/g	PMM 2.4	
Bacillus cereus		<200 CFU/g	PMM 2.5	
Clostridium per	fringens	<200 CFU/g	PMM 2.6	
Salmonella spe	cles	Not Detected /25g	PMM 2.7	
Listena monocy	togenes	Not Detected /25g	PMM 2.8	
Analyst: wh		AUTHORISED SK DATE REPORTED	-Ander	
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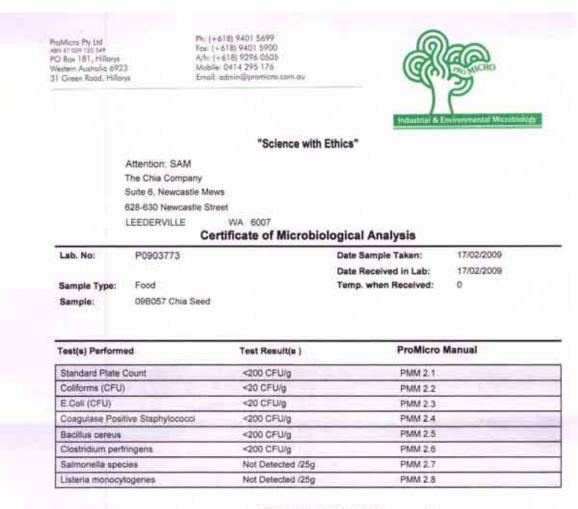
batch or other samples. Consequently the data may not receivery justify the eccentration or a bit or batch, a product work or support legal proceedings. Tests are curriently performed to support sequences of a bit or batch, a product work or support legal proceedings. Tests are curriently performed to support tests are backed and an analysis of the contract of a bit or batch and the supervise and the backed or support legal proceedings. Tests are curriently performed to support legal proceedings. Tests are a currient to analysis requested. Changes accurring the backet or contract of the backet of contract of a bit or batch and the supervise and the backet of contract of the support legal contract of the backet of contract of the backet of the support and the supervise and the support legal contract of the backet of the support and the support legal contract of the backet of the support and the support legal contract of the support legal c

FOOD LAW CONSULTANTS Substantial Equivalence – TCC seed January 21, 2010 Page 63 of 72

hoMicro Ply Ltd Will 47 004 (20 544 PO Box 181, Hillionys Western Australio 6923 31 Green Road, Hillionys	Ph: (+618) 9401 5699 Fax: (+618) 9401 5690 A/h: (+618) 9296 0505 Mobile: 0414 295 176 Empli: admin[]ipromicro.com.au	Rea
1		12
		Industrial & Environmental Mil
	"Science with	Ethics"
Attentio	a: SAM	
	Company	
	Vewcastle Mews	
	Newcastle Street VILLE WA 6007	
LEEDER	Certificate of Microbio	ological Analysis
Lab. No: P0903		Date Sample Taken: 17/02/2009
		Date Received In Lab: 17/02/2009
Sample Type: Food		Temp. when Received: 0
Sample: 09B02	3 Chia Seed	
Test(s) Performed	Test Result(s)	ProMicro Manual
Standard Plate Count	<400 CFU/g	PMM 2.1
Coliforms (CFU)	<20 CFU/g	PMM 2.2
E.Coli (CFU)	<20 CFU/g	PMM 2.3
Coagulase Positive Stap	vlococci <200 CFU/g	PMM 2.4
Bacillus cereus	<200 CFU/g	PMM 2.5
Clostridium perfringens Salmoneila species	<200 CFU/g Not Detected /25g	PMM 2.8 PMM 2.7
Listeria monocytogenes	Not Detected /25g	PMM 2.8
Lister & monocytogenes	not beleated roay	F mm 6-5
Analysts us	AUTHORISED	SIGNATORY:
Analyst: wh		And a war
	DATE REPOR	TED: 23/02/2009
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FOOD LAW CONSULTANTS Substantial Equivalence – TCC seed January 21, 2010 Page 64 of 72



Analyst: wh

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DATE REPORTED :

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he area pertains solely to the analytical and semping procedures used and the control number horsogenty of the samples as received. The data therefore may not be representative of the s alds or other samples. Consequently the data may not recessarily justify the adeptation or rejection of a lot or batch, a product ledal to support legal proceedings. This are routinely withing as adplicates unless seedbacky tequested, is the responsibility of the client to provide all information relevant to enalyse reparkated. Charges eccur is the backed content of indigous samples. Samples travels to expression are adplication, preferably within this and must be stored at 4 degrees oetsus or batch. Samples tested after 24 fre arror to regented as satisfadory because of tenenture adule and variation (e) stressed)

FOOD LAW CONSULTANTS Substantial Equivalence – TCC seed January 21, 2010 Page 65 of 72

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	The Chia Company	859 · · · · · · · · · · · · · · · · · · ·		
	PO Box 105	97)		
	LEEDERVILLE	WA 6902		
			alast Analysis	
Lab Mar	00000000	Certificate of Microbiolo		20/04/2009
Lab. No:	P0908952		Date Sample Taken:	CONTRACTOR OF STREET
Pamela Tunai	Food		Date Received in Lab: Temp. when Received:	20/04/2009
Sample Type: Sample:	09BD182		remp. when received.	
Sample,	0000102			
Test(s) Perform	bed	Test Result(s)	ProMicro	Manual
Standard Plate Coliforms (CFL	and the second sec	3,200 CFU/g 60 CFU/g	PMM 2.1 PMM 2.2	_
E.Coli (CFU)	<i>"</i>	<20 CFU/g	PMM 2.2 PMM 2.3	_
	itive Staphylococci	Contraction of the local division of the loc	PMM 2.3 PMM 2.4	
Bacillus cereus	and the second se	<200 CFU/g	PMM 2.5	_
Clostridium per		<200 CFU/g	PMM 2.6	
Salmonella spe	and the second se	Not Detected /25g	PMM 2.7	
Listeria monocy		Not Detected /25g	PMM 2.8	
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Analyst: wh		AUTHORISED SI	Anden Anden	
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FOOD LAW CONSULTANTS Substantial Equivalence - TCC seed January 21, 2010 Page 66 of 72



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data particula solvely to the analysical and sempling procedures used and the condition and homogenity of the samples as received. The data therefore may not be representative of the nor other samples. Convergiantly the data may not necessarily justify the acceptance or reported at vitromation received or support legal proceedings. Tests are following primed as diplicative unless specifically requires () is the responsibility of the line to prime a site of the solution and homogenity of the samples contract or support legal proceedings. Tests are following primed as diplicative unless specifically requires () is the responsibility of the line to prime and in a following the solution of the solution of the part assigns and the samples that contract occurs as occurs as occurs, preferably within 6 the rest must be solved at 4 degrees below as being tested after 24 ms to be regented as satisfactory because of termination solves and vanishing (or integent). dalive of the b

FOOD LAW CONSULTANTS Substantial Equivalence – TCC seed January 21, 2010 Page 67 of 72

xille 47 opr 130 s44 PO Box 181, Hillian Western Australia & 21 Green Road, Hi	923	Wh: 1+618; 9296 0505 Vabile: 0414 295 176 Emell: admin@promicro.com.ev /		
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	Attention: Natashi The Chia Company PO Box 105			
	LEEDERVILLE	WA 6902		
		Certificate of Microbi	ological Analysis	
Lab. No:	P0911153		Date Received in Lab: 14	4/05/2009 4/05/2009
Sample Type: Sample:	Food 078D147		Temp. when Received: 0	
Test(s) Perform	ned	Test Result(s)	ProMicro Man	ual
Standard Plate	Count	120 CFU/g	PMM 2.1	
Coliforms (CFL	J)	<10 CFU/g	PMM 2.2	-
E Coll (CFU)	and the second second	<10 CFU/g	PMM 2.3	
The second second	sitive Staphylococci	<100 CFU/g	PMM 2.4	
Bacillus cereur	the second s	<100 CFU/g	PMM 2.5 PMM 2.6	-
Clostridium per Saimoneila spe		<100 CFU/g Not Detected /25g	PMM 2.0 PMM 2.7	-
Sentrene ap	0.000			
Analyst: dc		AUTHORISE	SIGNATORY: Anda man	
		DATE REPOR	RTED : 18/05/2009	
<= less than; >= ^ = exponential	greater than			

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The task pertains apply to the weights at and sampling procedures used and the condition and homogenity of the samples as necessed. The data therefore may not be representative at the stability of other samples. Consequently the data may not be representative at the samples. Consequently the data may not be representative at the samples. Consequently the data may not be representative at the samples. Consequently the data may not be representative at the samples. Consequently the data may not be representative at the samples. Tasks are notifiedly applicable to attem samples. Consequently the data may not be represented as a provide at the representative at the samples. Tasks are notifiedly applicable to attem samples. Consequently the data may not be represented as point as possible where constants, preferable within it they and must be worked at 4 degrees believe to attempt at the data of the 24 the samples tasks and validations (e.g. attemptes tasks).

FOOD LAW CONSULTANTS Substantial Equivalence – TCC seed January 21, 2010 Page 68 of 72

ProMicro Ply 154 vide +7 509 155 Ive PO Box 181, Hillorys Western Australia 6923 31 Orean Rood, Hillorys Pm (+418) 9401 5699 Pex (+418) 9401 5900 A/h (+618) 9296 0505 Aubbie 0414 295 176 Email: admin@promicra.com.au

WA 6902



"Science with Ethics"

Attention: Natasha The Chia Company PO Box 105 LEEDERVILLE

Certificate of Microbiological Analysis

Lab. No:	P0911154	Date Sample Taken:	14/05/2009	
		Date Received in Lab:	14/05/2009	
Sample Type:	Food	Temp. when Received:	0	
Sample:	07BD158			

Test(s) Performed	Test Result(s)	ProMicro Manual
Standard Plate Count	540 CFU/g	PMM 2.1
Coliforms (CFU)	<10 CFU/g	PMM 2.2
E.Coli (CFU)	<10 CFU/g	PMM 2.3
Cosgulase Positive Staphylococci	<100 CFU/g	PMM 2.4
Bacillus cereus	<100 CFU/g	PMM 2.5
Clostridium perfringens	<100 CFU/g	PMM 2.6
Salmonella species	Not Detected /25g	PMM 2.7

Analyst: dc

AUTHORISED SIGNATORY:

DATE REPORTED :

Heda mes 18/05/2009

<= less than; >= greater than 1 = exponential



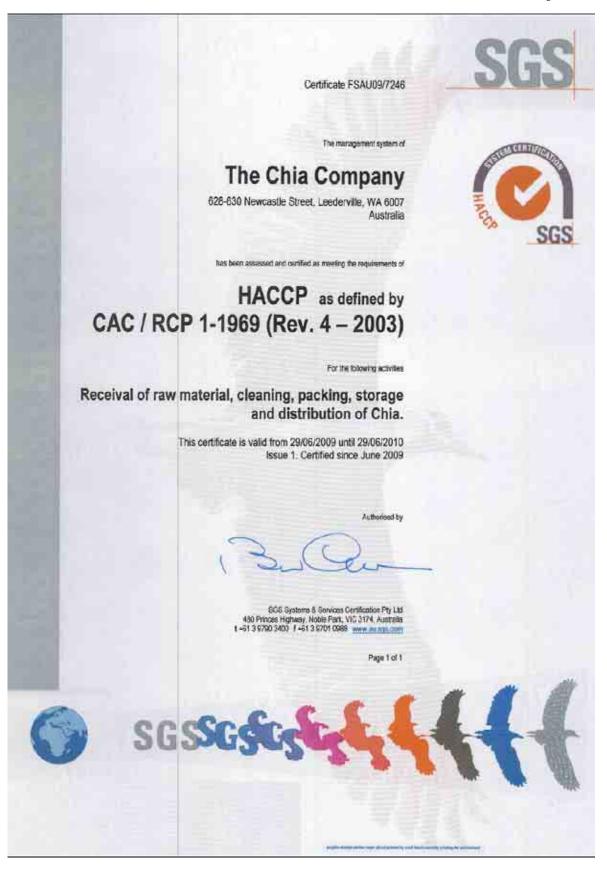
NATA Accredited Laboratory Number: 2561

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The data pertains equally to the analytical and partiting procedures used and the condition and homogenity of the earpies as reasoned. The data treatmost may not be representative of the in texture or other earpies. Consequently the data may not necessarily performance or reportion of a tot or hards, a product reactive may not be representative of the in texture or other earpies. Consequently the data may not necessarily performance or reportion of a tot or hards, a product reactive may not how earpies as the number performed as duplicates unless approximative in a tot recompositive of the steries of the may not how earlier of totopper samples. Carryon existent as soon as proaching when considering when if the earlier of degrees texture is being therein of the totopper samples. There are totaked or the totake of the steries of the earlier of the totake of the earlier of the totake regarded as assistancing sectores of termentum elevation of usersed).

Appendix 9: Certificate of compliance with HACCP system

FOOD LAW CONSULTANTS Substantial Equivalence – TCC seed January 21, 2010 Page 70 of 72



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