



12 February 2012

FSANZ

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Dear Sir/Madam

Application A1039 Low THC Hemp as a Food

The following link is to a report that helps put Australia and the Industrial Hemp industry in focus and clearer perspective than that may be experienced by some observers at present: <http://www.wefts.org.au/downloads/state-industrial-hemp.pdf>; the report was commissioned by WEFTS an organisation that is a member of *The Industrial Hemp Association NSW, Inc.* The report is relevant here as it was commissioned specifically as a strategic approach to FSANZ Application A1039.

As a stakeholder, the Industrial Hemp Association (IHA) NSW in agreement with: IHA Victoria, IHA Tasmania and IHA Queensland, strongly believes an expanding Industrial Hemp industry, to include hulled hemp seeds as food for human consumption, is a long overdue. In reality, in NSW today the general public including law makers, law enforcers are consuming hemp seed and oil to optimize health and fitness levels.

FSANZ concurs that Hemp seed (like linseed) is a natural, healthy food. In light of this fact, the government denying Australians access to the product has created an anomaly. Living in a democratic country, we expect Australia to lead the way in best health practice. The rest of the world can eat it; Australians want to be able to eat it too. In reality, there is, in Australia, a number of health food manufacturers who have infrastructure in place for exporting hemp derived products. Statistically the market is there, for example New Zealand, Japan, Europe and the USA all hold markets we could tap into now. The countries that are growing Industrial Hemp, for example, Canada, South Africa and Europe and China of course, cannot keep up with demand. Watch http://www.youtube.com/watch?v=6A1Y574YL_4&feature=player_embedded

Since the passing of various Industrial Hemp Acts in most Australian states, Industrial Hemp seed can be legally grown, harvested, transported and pressed. An Australian Industrial Hemp industry is viable and ready to expand with the legalisation of hemp seed as a food fit for human consumption. Check this link <http://www.cnn.com/id/45566657>, regarding benefits of investing in the Industrial Hemp industry.

Hemp based food provides an important source of nutrients, in particular protein, which is particularly important to over 1 million vegetarians in this country, important to the vegans and to the people who suffer from celiac disease, gluten and lactose intolerant people, people who are suffering from dermatological conditions such as psoriasis, and the health conscious in general.

According to the New Zealand Food and Grocery Council, “a diverse food supply is an important part of the New Zealand approach to life and the culture of this country”. The same applies here in Australia. Looking ahead to 2020, 2030 – 2050 the more we are regionally developed the better to ensure self-sustainability, food security and employment in Australia.

Questions FSANZ posed for Submitters have been processed, via group consultation and are answered as follows:

1. Will the inclusion of a maximum level in the Code for hemp seed oil products be an issue for hemp seed oil products produced in or imported into New Zealand?

A- No, the level of THC in current Hemp foods is less than 10 parts per million. Hemp seeds contain no THC so hemp derived foods could be produced to comply with lower THC levels.

2. Are there other methods of distinguishing between the seeds of hemp and drug varieties of cannabis? Please provide evidence in support of these methods.

A- Visually there is no difference. However possession of hemp seeds without a valid licence is an offence regardless of THC levels. The FSANZ proposal restricts the food to hulled seed and oil which are non-viable for propagation.

3. Are there other methods of rendering hemp seeds non-viable that will also result in the whole seed being distinguishable from the seeds of drug varieties of cannabis? Please provide evidence in support of these methods. Can you provide any evidence on whether hulled Hemp seeds remain viable?

A- Hulled seeds are not viable as they only have the fleshy interior and lack the hard exterior. Other methods of rendering seed unviable are heat treatment or irradiation. These methods are less than satisfactory as nutritional value is lost and taste could be affected. We would appeal strongly against heat treatment or irradiation of seeds in any form.

4. Are you aware of any studies reflecting the effect of consumption of hemp foods on the results of saliva THC tests?

<http://www.orasure.com/docs/pdfs/products/sat/Oral-Fluid-Collections-for-Marijuana-Testing.pdf>.

For your information view - <http://youtu.be/wlvMjRAMxCE>

5. Can you provide information on the type of saliva tests that are available, including sensitivity of the tests?

A- Refer to the previous link - <http://youtu.be/wlvMjRAMxCE>. There are many THC saliva tests on the market. One of the most widely used is the Drug wipe from Securetec which detects THC in saliva. A link to the company is included:

http://www.securetec.net/cms/upload/Produkte/DrugWipe/DW_S_Instructions_70058-v02-EN-110322_150dpi.pdf

6. What saliva THC tests are currently in use in Australia and New Zealand? For these tests, what levels of detection of THC are currently used?
A- refer to Q's 4 & 5 answers.
7. Provide information on the methodology of these tests and the costs of conducting these tests? Refer to Industrial Hemp Association of Victoria's President Lyn Stephenson who has employed a toxicologist to discuss these tests (email: info@hempvictoria.org; www.hempvictoria.org).
8. Can you provide any additional data on other THC testing methodologies that are used in Australia and New Zealand (for example, urine and blood)?
- A- THC and other compounds from cannabis can be detected in the blood and urine for some time after marijuana has been used. These compounds can be stored in body fat, to be gradually excreted from the body. For infrequent users of marijuana, a single occasion of use may be detectable in the urine for several days. Long-term heavy users of marijuana may have cannabis compounds detectable in their urine for many weeks after their last use of cannabis. However, it is difficult to determine how recently a person has used cannabis from blood or urine tests.
- B- The time that it takes before the average person will stop testing positive for THC is extremely variable and dependent on several factors. THC is the only one of the illicit drugs that is stored in the fat tissue, so it can take longer to be cleared from the system. Every individual has a different body size and shape and metabolism, which are all factors in how quickly the drug will be eradicated.
- C- The concentration of THC can also vary greatly between plants, from 1-30% of the total dry weight, thus a person who ingests or smokes marijuana with a very high THC level will probably take longer than someone who has taken marijuana with a low THC level to clear the drug from their system. It is very dependent on how much an individual has smoked, how often, what they have smoked and how long they have been smoking.
- D- Usually someone who has one dose of marijuana and is not a common smoker it would probably take between 1-4 days to be cleared from the system, but for a very heavy and constant smoker it can take up to 4 weeks. For a very heavy and constant smoker, with some form of metabolic disorder, i.e. Hepatitis C, it can take up to 8 weeks.
9. Which analytical laboratories currently conduct confirmatory THC testing, for example blood tests? How much do these tests cost?
- A- There are many. A register of companies exists including the types of tests they conduct. The link is: <http://www.drugtesting.net.au>

One example is Medvet <http://www.medvet.com.au>. Medvet is available in all states and all capital cities.

Medvet can provide drug testing anywhere in Australia including regional locations- Medvet has over 115 sample collection staff nationally.

- Workplace Drug Testing NSW - New South Wales
- Workplace Drug Testing SA - South Australia
- Workplace Drug Testing VIC - Victoria
- Workplace Drug Testing QLD - Queensland
- Workplace Drug Testing WA - Western Australia
- Workplace Drug Testing NT - Northern Territory
- Workplace Drug Testing TAS - Tasmania
- Regional Workplace Drug Testing

Medvet can perform drug testing in every capital city

- Workplace Drug Testing Sydney
- Workplace Drug Testing Adelaide
- Workplace Drug Testing Melbourne
- Workplace Drug Testing Brisbane
- Workplace Drug Testing Perth
- Workplace Drug Testing Darwin
- Workplace Drug Testing Alice Springs
- Workplace Drug Testing Hobart

10. Do you have data to indicate the levels of THC in current hemp food products? Is it likely that hemp foods could be produced to comply with lower maximum levels of THC?

A- The level of THC in current Hemp foods is less the 10 parts per million. This easily complies with regulatory requirements, and is well under maximum THC levels. As hemp seeds contain no THC hemp foods can be produced to comply with lower THC levels.

11. Would additional processing costs be incurred in order to achieve lower THC levels in hemp foods?

A- The cultivars available are already low THC and therefore no additional costs are incurred.

12. FSANZ seeks advice on the number of hemp licenses and hemp businesses in Australia and New Zealand to better calibrate the market potential.

A- . Information on the number of hemp licenses would have to be sourced from the Department of Primary Industries in each state and New Zealand. Regarding the number of Hemp businesses, the Dept. of Fair Trading would hold business registrations for these and could answer this question. One thing is certain the numbers continue to grow if examples of Hemp businesses worldwide are any indication.

13. FSANZ seeks advice on other cost items that might influence the analysis.

A- Comprehensive information on all matters pertaining to the development and regulation of the Hemp food industry are available from the Canadian Dept. of Trade.

14. FSANZ seeks advice on possible entry barriers to a hemp food market.

A- Individual countries with significant Industrial Hemp food industries may impose tariffs to protect local enterprise.

Yours sincerely

Beatrice Kuyumgian-Rankin (Mrs)
President

Industrial Hemp Association Inc