



## Hemp Australia Pty Ltd

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FSANZ

Standards Management Officer

### APPLICATION 1039 – LOW THC HEMP AS A FOOD

Thank you for the opportunity to once again comment on this application.

As a business operating under the current licencing conditions in Tasmania, Hemp Australia Pty Ltd is the leading Australian producer of premium Hemp seed oil. Personally, we have been involved in most aspects of the industry, as our previous submission to FSANZ (name of Teale) expressed.

We support the application with the option of 2C being the most favourable.

To combat the compliant and enforcement issues particularly when relating to the consumer public having whole hemp seeds, a suggestion would be to have a licensing procedure in place until the point of destruction of the seed, ie, de-hulling, pressing. This is not the preferred option, however if it meant that the hemp food industry could then proceed in Australia then this could be the starting point. However, the licensing requirements need to be uniform throughout Australia and must not be convoluted or expensive for a manufacturer or processor to have access to the seed as this would still inhibit the industry. The licences should not just be limited to 1 year as this becomes an impost on the manufacturer/processor.

A compliant manufacturer/processor would need to know that the seed they are purchasing/receiving meets the THC standards, therefore the in-field testing THC result should be provided to the purchaser of the seed.

As processor of a human food product I would want to be sure of seed quality and being able to meet the THC standards set by FSANZ.

Under current licencing requirements in Tasmania for growing “industrial, cannabis sativa”, THC testing is done at flowering in the field. We believe that a certificate should be issued at this point stating that the seed produced at this site meets the food regulatory standard for hemp foods. This is where the audit trail for the production of food-grade seeds should begin. This THC test result or certificate should follow the seed to the food manufacturer as proof of product and compliance to the THC requirements. The THC reading at this time would be the highest that could be expected, as THC can only be present on the outer shell of the seed and not in the seed itself. Cleaning of the seed will remove any small trace elements. From there, no further controls should be required regarding testing and compliance.

We need uniform national standards for the growing, distribution and initial manufacture of whole hemp seed. Having different rules for each state cannot work. This may impact on the listings in some states of low THC hemp under their respective Poisons Acts. The adoption of “in-field” test THC limits being set at no more than 1% is recommended. This is currently in place in NSW, QLD and ACT.

Our view is that lifting the prohibition of hemp as a food in Australia will result in significant economic benefits for primary producers and manufacturers, and substantial health benefits for consumers. Personally, we have been involved in an extremely “hands-on” manner in the hemp industry in Tasmania and throughout Australia. This includes retailing and wholesaling hemp products, holding and organising licences for growers in Tasmania, liaising with State Government departments including the Department of Health and Human Services, Department of State Development and the Department of Premier and Cabinet.

We also formed and worked with members of the then Hemp Co-Operative of Tasmania, who assessed food options in Tasmania prior to and during the A360 application of 2000. We also held a hemp seed handling licence, a wholesale chemist licence, organised and distributed hemp garden mulch in Tasmania, hemp paper and cards made in Tasmania from local mulch, and have continuing involvement with growers and industry stakeholders.

We are also founding members and office bearers of the Industrial hemp Association of Tasmania and for the past 4 years, under the brand of Hemp Australia, have been providing the market with exceptionally high quality Australian (Tasmanian) hemp seed oil and meal.

Because of this substantial involvement, we feel we have an insight into this burgeoning industry.

Brandt & Lisa Teale

15/2/2012 via email