

From: Lucky Luxton <luxtonlucky@hotmail.com>
Sent: Monday, 9 May 2011 9:31 PM
To: submissions
Subject: RE: Re-submission FSANZ Application A1039 [Sec: UNCLASSIFIED]
Attachments: Contact Details.doc

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Dear Colleen,

Please find my re-submission for Application A1039.

I hope the contact details attachment works. I've saved it as a word doc.

Regards
Andrew Luxton

FSANZ Application A1039

Hemp Foods for Australia

Discussion points

- 1. Are you aware of any evidence that consumers believe that low THC hemp foods have psychoactive effects**

No. From my experience in England and Europe consumers know that hemp foods are low thc and have no psychoactive effects. They also know that it is one of the best nutritional foods available

- 2. Are you aware of any evidence that representations on low THC food (including labelling and advertising) mislead consumers by leading them to believe that low THC hemp foods have psychoactive effects when consumed?**

No. I have a container of Braham & Murray "GOOD SEED" Slightly salted, lightly toasted hemp seed from England. The information on the labelling includes words such as nutritious, delicious, good source of omega 3,6 & 9, that EFAs and GLA in GOOD SEED are vital to human health and that no other seed gives such goodness. There is no misleading information on this container of roasted hemp seed.

GOOD SEED and many other's sell hemp seed foods and oils through chain supermarket stores such as ASDA. This is the equivalent of coles or woolies in Australia. There is no misleading information on any of these products. They all stated the benefits of the available nutrients in hemp seed, especially Omega 3, 6 & 9 which are found in the right quantity that the body needs for normal daily function.

3. **Can you provide any evidence in addition to that presented in this consultation paper whether or not the consumption of low THC foods can return a positive test for a THC drug test?**

From my experience in the UK and Europe where hemp seed and its derived products are freely available at supermarkets, health food store and service stations, there was no evidence to suggest that the consumption of hemp foods would in anyway return a positive thc test.

750 ml bottles of pure hemp seed oil can be purchased at ASDA for the same price as other oils. I believe this to be evidence to show that the consumption of even pure hemp oil will not return a positive thc test.

4. **Can you provide information on THC testing in Australia and NZ, particularly with regard to regulatory limits of THC that may be set?**

There are many scientific studies that show the beneficial effects of thc and other cannabinoids on the human body.

Hemp seed contains no thc and the industrial cannabis variety used is tested during the growth cycle to ensure low thc cultivation. This controls the the possible amount of thc residue on the seed during production.

5. **Can you provide information to indicate whether there will be an impact on the cost of testing for THC in humans that could arise from an approval of hemp foods?**

My experience in England and Europe showed no impact on testing humans.

6. **Do you agree that there are adequate controls currently in place, or that would be achieved by imposing maximum limits for THC, to mitigate any risk of high THC Cannabis varieties entering the food supply?**

I agree that the current controls on industrial cannabis and high thc cannabis mitigate any risk of high thc cannabis varieties entering the food supply, due to the inflated blackmarket price of seedless cannabis flowers.

7. **Do you consider that trade practices legislation in Australia and New Zealand is sufficient to mitigate the potential risk that representations (including labelling and advertising) of hemp foods could suggest psychoactive properties relating to consumption of those foods? If not, what labelling and representations of hemp foods should be considered?**

I consider the trade practices legislation to be sufficient to mitigate the risk of false advertising. Hemp seed and its derived products contain only minimal amounts of thc due to the regulatory testing that takes place. The beneficial properties of hemp, such as being a great plant source of EFAs far outway any psychoactive appeal there might be.

8. **What is the potential opportunity costs for current producers of hemp crops if hemp foods continue to be prohibited?**

If hemp food continues to be prohibited then current produces of hemp will not have access to one of there major potential markets. If the prohibition on hemp foods was lifted then farmers would have a crop that not only produced food but would also produce waste material (stems) that would be able to “fire up” the hemp construction industry making hemp a very profitable, ecologically sound opportunity

9. What are the potential benefits to food manufacturers if hemp foods were approved for use?

The benefits to manufacturers are:-

- They can use the most nutritious seed known in there foods
- They can advertise the “goodness” available in the hemp seed foods.
- There will be big \$\$\$ as the demand for hemp seed food is high
- They could also promote their business as being carbon neutral due to the large amounts of CO2 absorbed during growth.

10. . Are there likely to be any additional costs for food manufacturers wishing to supply hemp foods?

Only a small initial cost but the benefits and demand will cover those in a short time. Food manufacturers set to make big \$\$\$ from the introduction of hemp seed foods.

11. Would the approval of low THC hemp foods increase the cost of food enforcement beyond what would be expected of the approval of any other substance added to food, or other food regulatory change?

No increase in cost would occur due to the regulatory testing that takes place during the growing of the hemp. All seed would be low in thc.

12. What other legislation would affect or be affected by approval of hemp foods?

Legislation around cannabis could be affected as peoples knowledge of the benefits becomes greater and they see the effects first hand of eating hemp foods

13. Would the approval of hemp food have an impact on hemp regulations in Australia and New Zealand? Would industrial hemp destined for use in food require additional controls to those already specified in industrial hemp regulations?

There would be no impact on hemp regulations. No additional controls are necessary.

14. Would food manufacturers be required to be licensed under existing hemp regulations?

If there supplier of seed is a licensed grower then there would be no reason for the food manufacturer to be licensed.

15. Would additional costs be incurred by government agencies responsible for granting licenses for the cultivation of hemp as a result of approval of hemp foods?

Government agencies already make money from granting licenses for the cultivation of hemp. It would be of great benefit to the government financially to allow hemp food for consumption. Farmers will be applying for the licenses once the food market is there.

16. . Can you identity risk management options that have not been considered in the impact analysis?

There is no risk at ending the prohibition of hemp seed for food. Countless benefits can be found by consuming hemp seed and this is shown by the acceptance of hemp seed as a food in other civilised countries

17. Can you identify any other costs and benefits for any of the risk management options considered in this paper?

Cost

- The cost of prohibition at this time on families across Australia suffering from omega deficientcies .
- The effect of omega defecientcy and associated costs.
- The cost to ocean life due to over fishing/misleading science
- The effects of Genetically modified crops on ecology and humans

Benefits

- Hems CO2 cycle
- Environmental effects of growing hemp
- Social benefits of good nutrition
- The benefit to ocean life due to lower commercial pressure

18. . Do you have a view about the appropriate preferred regulatory options regarding the approval of hemp foods, based on benefits and costs?

My view about the appropriate preferred reguatory options regarding hemp foods would be based on the benefits. The fact that hemp seed contains EFAs and GLA should be all that is needed for hemp seed to be approved. Add onto that all the health, environmental and social benefits as well as the increase in employment opportunities and there is no discusion about application 1039, the facts speak for themselves. Hemp seed is safe, economically sound, and most of all demanded by the people.

Andrew Luxton

**1091 Stoney Chute Rd
Wadeville
2474
NSW**

From: submissions@foodstandards.gov.au
To: luxtonlucky@hotmail.com
Date: Fri, 29 Apr 2011 11:58:02 +1000
Subject: FW: FSANZ Application A1039 [Sec: UNCLASSIFIED]

Dear Andrew

Is it possible for you to re-submit your comments as the attached file is corrupt and cannot be read.
Also, when you do would you please fill out and return the attached form for more contact details for our database.

Regards

Colleen Seamons
Assistant Standards Management Officer
Regulatory Affairs & Parliamentary Section

From: Lucky Luxton [mailto:luxtonlucky@hotmail.com]
Sent: Sunday, 24 April 2011 10:00 PM
To: standards management
Subject: FSANZ Application A1039

Dea FSANZ,

Please find attached answers to the questiions outlined in Application A1039

Thanks for the opportunity to have my say

regards

Andrew Luxton

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