

Application A1039 Low THC Hemp as a food

Preamble.

Our company is a vegetable oil producer and bottler specialising in certified organic culinary oils such as Flaxseed (high Omega-3 ALA), Sunflower, Safflower, Olive, Almond, Apricot, Coconut, Sesame, Evening primrose and Wheat germ Oils. Most of these oils are imported into Australia.

We do import organic Hemp Oil for cosmetic use, but would prefer to add it to our other edible oils, especially as it has a healthy fatty acid profile – Omega-3 20-25% ALA and 1-2% Steridonic as well as 2-4% Gamma Linoleic (GLA). It is one of the very few oils that contain ALA and GLA.

It can be produced locally and is therefore beneficial to our economy.

We believe that Hemp oil should have a maximum limit of 10ppm THC and that it should be handled in a similar way to other vegetable oils.

Note error on Page 11 – 125ml would be 25 metric teaspoons – not 8!

Questions for comment

- 1 Psychoactive effects – consumers may think this is the case because of the regulation forbidding its sale, however they will be disillusioned.
- 2 There is no evidence that consumers have been mislead reading labels because there have been no food products on the market to mislead.
- 3 I have not read of anyone in the US or Canada that has returned a positive drug test from eating hemp foods.
- 4 No information
- 5 If a department is specifically set up to test humans for THC levels then of course there will be a cost.
- 6 Australian Hemp Regulations (Attachment 1) is adequate but uniformity between the states should be attempted.
- 7 FSANZ already control labelling standards. Claim restrictions can be gazetted.
- 8 There is an opportunity for hemp seeds r oil to be safely used in foods which provide an Omega-3 health benefit. The cost of not providing this benefit is unknown.
- 9 Food manufacturers can provide a benefit due to the aforementioned.
- 10 The only additional cost is the THC test on seeds and/or oil.
- 11 Food inspection is already in the hands of local councils – there may be a marginal increase in costs.
- 12 No comment
- 13 Added together existing controls should be adequate
- 14 Food manufacturers should not be licensed unless they are making a therapeutic claim.
- 15 No comment
- 16 No mention has been made in the impact analysis of the health benefits of hemp oil.
- 17 See above
- 18 Treat Hemp foods like any other food through the normal processes.