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Seamons, Colleen

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**From:** standards.management@foodstandards.gov.au  
**Sent:** Wednesday, 16 March 2011 1:31 AM  
**To:** standards management  
**Subject:** FSANZ: Applications and Submissions - Submission [SEC=INCONFIDENCE]  
**Attachments:** Sgray submission on Application A1039.docx



**FOOD STANDARDS**  
Australia New Zealand  
Te Mana Kounga Kai - Ahitereiria me Aotearoa

**FSANZ: Applications and Submissions - Submission**

Wednesday, 16 March, 2011

- 1. Assessment Report Number:** A1039
- 2. Assessment Report Title:** Low THC Hemp as Food
- 3. Organisation Name:** Steven Gray
- 4. Organisation Type:** Individual
- 5. Representing:** myself
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- 12. Submission Text:** See attachment

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Steven Gray – Submission on Application A1039 – Low THC Hemp as a Food

FSANZ Question	Response
1. Are you aware of any evidence that consumers believe low THC hemp foods have psychoactive effects?	As a long time consumer of hemp oil, I don't believe there is any evidence of this. There is no way that consumers could expect that these low THC hemp foods have any psychoactive effects and once they tried them they would realize that they do not have any psychoactive effects.
2. Are you aware of any evidence that representations on low THC hemp foods (including labelling and advertising) mislead consumers by leading them to believe that low THC hemp foods have psychoactive effects when consumed?	There is no evidence of this. It is clear from labels of products I have seen in the US and other countries that there can be any psychoactive effect of consuming these low THC hemp food products.
3. Can you provide any evidence in addition to that presented in this Consultation Paper whether or not the consumption of low THC hemp foods can return a positive result for a THC drug test?	I have no evidence to this and believe none exists.
4. Can you provide information on THC drug testing procedures in Australia and New Zealand, particularly with regard to regulatory limits of THC that may be set?	No
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?	There will be none.
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?	Yes!
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 other conditions regarding labelling and representations of hemp foods should be considered?	I think the legislation is adequate.
8. What is the potential opportunity cost for current producers of hemp crops if hemp foods continue to be prohibited? Please provide quantitative data if available.	I don't have the quantitative data, but this is a large potential economic loss for our farmers. In addition, there are numerous ecological benefits to the crop especially compared to some of the cellulose crops that are being used widely in New Zealand such as wood. We should be exploring hemp crops for non-food uses as well.
9. What are the potential benefits to food manufacturers if hemp foods were approved for use?	The potential economic benefits are huge, but we need to make it less of a regulatory nightmare for these producers. Right now,

	the current regulations for growing industrial hemp are too restrictive. As a result, not many farmers are getting involved in the crop.
10. Are there likely to be any additional costs for food manufacturers wishing to supply hemp foods? Please provide quantitative data if available.	I'm sure there are, but do not have data on this.
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.
12. What other legislation in Australia and New Zealand would affect or be affected by approval of hemp foods?	Not sure, but we should be trying to reduce the regulatory barriers to having farmers involved in this crop.
13. Would the approval of hemp food have an impact on existing hemp regulations in Australia and New Zealand? For example, would industrial hemp destined for use in food require additional controls to those already specified in industrial hemp regulations?	We should be trying to lessen industrial hemp regulation. The potential harm has been exaggerated as a result of the drug wars. Let's put some common sense back into force. Reduce the regulations for farmers.
14. Would food manufacturers be required to be licensed under existing hemp regulations?	Not sure.
15. Would additional costs be incurred by government agencies responsible for granting licences for the cultivation of hemp as a result of approval of hemp foods?	Potentially yes, but it is clear that these should be reduced so more growers can get involved.
16. Can you identify other risk management options that have not been considered in the impact analysis? Comments on the possible costs and benefits are welcome.	Potential risk management has been exaggerated. Let's stop worrying about the psychoactive nature of low THC hemp and get on with encouraging the crop.
17. Can you identify any other costs and benefits for any of the risk management options considered in this paper?	
18. Do you have a view about an appropriate preferred regulatory option regarding the approval of hemp foods, based on benefits and costs?	My personal view is that we should consider it as we do other crops. It isn't a danger, in fact, it was widely used before the war on drugs. Let's get back to having it be a substantial part of our economy. It's healthier, better for the environment, and economically very good for New Zealand.