

FIT-BioCeuticals Ltd Submission - FSANZ Consultation: Proposal P1042 Low THC Hemp Seeds as Food

FIT-BioCeuticals, supports the recommendations set forth in Proposal P1042 – Low THC Hemp Seeds as Food which was developed to consider a food regulatory measure to permit the sale of food derived from the seeds of low delta 9-tetrahydrocannabinol varieties of *Cannabis sativa* (*C. sativa*) (low THC hemp).

We understand the key recommendations to be:

1. Low THC hemp seeds may only be sold as a food if they are hulled and non-viable. Only seeds from low THC varieties of *C. sativa* could be used as a source for food and only naturally occurring THC may be present in low THC hemp seed foods. 'Hemp', 'Low THC cannabis' and 'Hempseed oil' are acceptable ingredient names.
2. A limit on cannabidiol (CBD) and other cannabinoids is not necessary due to the lack of safety concern associated with exposure to these cannabinoids at the levels present in low THC hemp seed foods. Furthermore, there is no need to set a CBD limit to distinguish food from therapeutic goods. However, it is not permitted for CBD (or other cannabinoids), including CBD extracted or derived from seeds of low THC *C. sativa*, to be a food for sale or used as an ingredient in a food for sale.
3. The maximum levels of THC that may be present in low THC hemp seed foods is defined as the total amount of THC and the acid precursor delta 9-tetrahydrocannabinolic acid (THC-A). These limits being:
 - Hemp seeds (5mg/kg)
 - Hemp seed oil (10mg/kg)
 - Processed hemp seed products (5mg/kg)
 - Hemp seed based beverages (0.2mg/kg)
4. There is no need for additional labelling or advertising requirements in the Code for low THC hemp seed foods, primarily because no relevant available scientific evidence that can be used as the basis of risk analysis to apply such measures, has been identified.

FIT-BioCeuticals is aware of government policy that does not permit:

- the use of the cannabis leaf or any representation that states, suggests or implies a link with illicit cannabis in any marketing or advertising of hemp seed food
- food derived from hemp seed being advertised as having psychoactive effects.

We note that the results of research investigating the impact of consumption of low THC hemp seed foods on random roadside drug testing programs will not be available until later in 2016. We would be interested to see how this could affect the Maximum Limits proposed.

We also note that there are a number of Commonwealth, New Zealand and State and Territory legislation that will need to be amended to permit the sale of low THC hemp seed foods.

We look forward to hearing the outcome of this consultation.

SIGNATURE 

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