

## **Submission in Support of FSANZ Proposal P1042**

This submission is on behalf of:-

### **NSW INDUSTRIAL HEMP ASSOCIATION INCORPORATED (INC 9893530)**

This submission is made by:-

#### **James Vosper – President NSW IHA**

This submission has been designed to address the main objections most recently made in relation to the legalisation of hemp seed and oil as human foods in Australia and New Zealand. This is important as hemp foods are uniquely nutritionally beneficial. If the law is changed the hemp industry has the potential to provide jobs on a significant scale and stimulate rural communities that are currently disadvantaged.

The potential of the industry internationally is significant, due to the perception and reputation of Australia and New Zealand as being clean environments that produce high quality foods. This is especially important in the case of the hemp plant as it is capable of sequestering more pollutants from the air and the soil than any other crop.

The three main areas of concern raised will now be addressed:-

#### **Road-side drug testing**

This issue has been addressed in full by FSANZ, in submission A1039, but needs to be restated. Hemp foods will not deliver a false positive reading in a roadside drug test. Hemp seeds of any variety contain no THC. The only way that THC would be present in a high THC hulled seed would be as contaminant and this would be in the low parts per million range. Industrial hemp seeds being from low THC plants have no THC contamination.

#### **Cannabidiol (CBD) levels of hemp food**

As with THC, there is no CBD in the hulled seed. CBD exists within the plant itself, in the bracts to be specific. High CBD strains of seed have been bred at immense cost to the plant breeders. For this reason breeders are highly protective of their seed stock and the possibility of CBD finding its way into foods is extremely unlikely. In any case, CBD does not pose a threat to health.

#### **Marketing, Advertising and labelling**

Australian consumer law and Australian advertising standards comprehensively cover misleading claims in marketing, advertising and labelling. The ACCC has comprehensive rules on advertising and selling (<http://www.accc.gov.au/publications/advertising-selling>). Fines are significant where companies have sought to mislead the public.

The advertising industry is also self-regulated by the Australian Association of National Advertisers (<http://aana.com.au/self-regulation/codes/>) where there are specific codes on the advertising of food and beverages. The peak body for communications in Australia is the Communications Council (<http://www.communicationscouncil.org.au/index.aspx>). This covers all media and the operations of media owners, advertising agencies and media buyers. With this framework in place there would be little room for confusion and false claims would carry heavy penalties.

In conclusion The NSW Industrial Hemp Association supports the FSANZ submission and looks forward to the growth of a healthy hemp industry.

Yours faithfully,

James Vosper