

Submission to Food Standards Australia New Zealand

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Ours is a very brief submission to support the application A 1039: Low THC Hemp as a Food.

We believe that FSANZ has enough technical and scientific information to show the high food value and 'community good' reasons for the application to be successful. We are convinced that the health and economic benefits to our countries would far out way any perceived disadvantages.

The Clutha Agricultural Development Board is a not-for-profit group representing 195 paid-up members and we run agricultural trials, demonstrations, field days, seminars and activities to support knowledgeable and profitable farming in our district.

We have a small, but enthusiastic and committed Associate Group of farmers (the Catlins Hemp Group) who have grown two crops of food & fibre hemp (low THC hemp as per the application) in recent years – working through the regulatory and agronomic issues surrounding this crop.

Our farmers continue to be mystified as to the reasons why this crop should not be able to be grown (albeit with some licensing regime) as per any other arable crop. Food & fibre hemp has the potential to be a useful alternative crop for southern farmers. It is a completely different crop from its disreputable, higher THC plant relative. The two different plants have completely different growing regimes, completely different types of grower, and completely different types of market. We believe there is no likelihood of confusion when 'low thc hemp' is able to be treated as a food as per the application.

The approval of this application would be a good first step to progress with this crop which we believe is long overdue. However, we would also urge caution as to any riders or regulations the FSANZ may be tempted to put on the proposal. We have battled through the licensing regime in NZ to grow the crop and believe that the crop should not be accepted and then given such a framework as to make growing it very, very difficult. We are aware of many farmers who have been put off the possibility of growing hemp for the seed oil because the New Zealand regulations are seen as a huge barrier. This is probably seen as a local, government issue. We would also like Food Standards Australia New Zealand to understand that their sensible decision in approving A 1039 may be counteracted at another level, and should do what is in its power to avoid what would then have been a time-wasted exercise in this application process.

Thank you for your consideration of this submission by a group of farmers who just want to get on and grow a valuable crop for society's health and economic benefit.

Malcolm Deverson