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Additional submission to Application 1039

Summary:
I support Option 2C regarding Application 1039.

Background brief:
My significant involvement and experience with hemp farming and end-use production in Australia spans 14 years and is detailed in FSANZ submission "Teale" to Application A1039 and ANZFA submission "Hempen Things" to the original Application A360.

Further information for FSANZ and Committee consideration:
The recent release of supporting documents and annexes concerning Application A1039 show some disinformation regarding licensing and security of hemp crops, specifically, concerns by the Federal Health Department and some Members of Parliament about the security of crops in the paddock and seed handling. In clarification:

(a) In Tasmania, my involvement as an adviser to government, police and health authorities has included the safe and secure cultivation of industrial (non-drug) hemp on a broad-acre and commercial scale for more than a decade. Therefore there is a long and proven track record of auditing, safety and security regarding the farming, storage and transportation of industrial hemp. There has been close scrutiny by Tasmania Police and the State Department of Health and Human services for many years.

In this regard, the FSANZ committee must weigh-up any conjecture by concerned parties with no experience in growing/handling/licensing hemp with the real-life facts of a lengthy and proven track record of security and licensing in Tasmania, a record that sets a positive benchmark.

(b) FSANZ's calculation of costs of compliance appears to mix Australian hemp production and the importation of raw or processed product, specifically, customs and quarantine. The farming of industrial hemp in Australia involves no time or cost impost on customs or quarantine. Therefore, any calculation on costs should segregate local production from imported raw or processed product.

Streamlining of licensing requirements would also greatly reduce costs to producers and growers.

(c) Licensing of hemp seed need not be as convoluted or extended as some other submissions suggested. Simply, when a whole seed is rendered unviable (not able to germinate) through any method (crushing, steaming, part-production process, de-hulling, irradiation, heating,, etc), it should no longer require any licensing in order to be held or processed, thereby allowing the consumer and/or processor to be in possession of it.

If a manufacturer receives licensed/certified industrial hemp seed from a licensed grower/handler with the express purpose of a production process that renders the seed unviable, no further licensing should be required. This is simple and negates further compliance costs.

Yours sincerely
Brandt Teale