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Application A1039 Low THC Hemp as a Food

Our company, BioLogical Products has invested, heavily, in infrastructure to assist in value adding industrial hemp products**.** **In reality** a proportion of the more informed amongst health conscious groups; those suffering from coeliac disease and/or for example, psoriasis and other dermatological conditions; vegetarians and vegans – consume hemp oil and hemp seeds today in every state and territory of Australia. We know that Australia will be moving towards sustainable self-sufficiency in the decades to come. It is a fact that hulled or shelled hemp seeds, for example, provide a top quality source of nutriment for animals and especially for humans. Watch this link: Watch this link: http://www.youtube.com/watch?v=6A1Y574YL_4&feature=player_embedded demonstrating the high level of success the featured company has experienced in Canada over the past few recent years.

1. Will the inclusion of a maximum level in the Code for hemp seed oil products be an issue for hemp seed oil products produced in or imported into New Zealand?

   A - No

2. Are there other methods of distinguishing between the seeds of hemp and drug varieties of cannabis? Please provide evidence in support of these methods.
   A- Visually there would be no difference. However possession of hemp seeds without a valid license is an offence regardless of THC levels. The FSANZ proposal restricts the food to hulled seed and oil which are non-viable for propagation.

3. Are there other methods of rendering hemp seeds non-viable that will also result in the whole seed being distinguishable from the seeds of drug varieties of cannabis? Please provide evidence in support of these methods. Can you provide any evidence on whether hulled Hemp seeds remain viable?

   A- Hulled or shelled seeds are not viable as they only have the fleshy interior and lack the hard exterior. Other methods of rendering seed unviable are heat treatment or irradiation. These methods are unsatisfactory as nutritional value is lost and taste affected.

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4. Are you aware of any studies reflecting the effect of consumption of hemp foods on the results of saliva THC tests?
   A -No

5. Can you provide information on the type of saliva tests that are available, including sensitivity of the tests?
   A - We do not support the use of saliva testing, as it is a poorly researched and unreliable method of testing. No benefit has been demonstrated on road safety. We support impairment based testing, as is currently done in New Zealand.

6. What saliva THC tests are currently in use in Australia and New Zealand? For these tests, what levels of detection of THC are currently used?
   A - There is no reliable data but we are informed **false positive results are common**, placing an unnecessary stress on members of the public. Refer to the following link for an example of reliable saliva testing: http://youtu.be/wlvMjRAMxCE

7. Provide information on the methodology of these tests and the costs of conducting these tests?
   A -We do not support the use of these tests and feel they are not in the public interest nor are they public money well spent.

8. Can you provide any additional data on other THC testing methodologies that are used in Australia and New Zealand (for example, urine and blood)?

A – No

9. Which analytical laboratories currently conduct confirmatory THC testing, for example blood tests? How much do these tests cost?

A - We do not support intrusive pharmaceutical testing, unless impairment is first demonstrated

10. Do you have data to indicate the levels of THC in current hemp food products? Is it likely that hemp foods could be produced to comply with lower maximum levels of THC?

A- **The level of THC in current Hemp foods is less the 10 parts per million**. Hemp seeds contain no THC so hemp foods could be produced to comply with lower THC levels.

11. Would additional processing costs be incurred in order to achieve lower THC levels in hemp foods?

    A- Requiring zero level THC is unnecessary from a food safety perspective. Producers could face additional costs due to test failures, leading to stock losses.

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12. FSANZ seeks advice on the number of hemp licenses and hemp businesses in Australia and New Zealand to better calibrate the market potential.

A - The hemp industries are in the process of rapid evolution. This year's data will be history in the near future as the food, cosmetic and building products enter the market place. The Industrial Hemp Association INC (IHANSW) intends to collate statistical information of that nature in the immediate to near future. Sources would be from the Department of Primary Industries in each state and New Zealand. Regarding the number of Hemp businesses, the Dept. of Fair Trading would hold business registrations for these and could answer this question.

13. FSANZ seeks advice on other cost items that might influence the analysis.

A- We are informed that comprehensive information on all matters relating to the development and regulation of the Hemp food industry are available from the **Canadian Department of Trade.**

14. FSANZ seeks advice on possible entry barriers to a hemp food market.

A- Poorly informed Government restrictions have been the main barrier to a viable Industrial Hemp food market for humans, with better education, well informed decisions by the Government are likely - resulting in current, mainstream practice being better reflected in Government policy.

Regards

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