

FSANZ - Submission- Proposal P1042-Low THC Hemp as a food

Our team is encouraged by the recent draft approval for legal consumption of Low THC Hemp Food by Food Standards Australia & New Zealand FSANZ -P1042. The latest review is the most complete and detailed to date and opens the door for ministerial approval of Low THC derived Hemp Foods. An approval for consumption of Hemp seed is overdue and urgently needed to update Australia and New Zealand to global industry developments on this issue. Furthermore, a national subsidies & grants scheme should be made available to accelerate our local industry which is necessary for Australia's ability to compete with strengthening overseas Hemp food markets.

New approaches & attitudes towards the misunderstood Cannabis Sativa plant are facilitating change. Encouraging media stories showing the benefit of Medical Cannabis for patients & Hemp for essential nutrients have helped shine a new light on Cannabis & Hemp based wellness products.

While the Australian Hemp based nutraceuticals market has gone from strength to strength, our domestic seed and oil derived food products market have been limited with a restriction placed on the human consumption of Hemp oil based food products. Our domestic food regulator, Food Standards Australia New Zealand (FSANZ) has end-user consumption bans in place since the late 1980's, citing concerns from local law enforcement about THC, the psychoactive drug found in Cannabis, which levels present in Industrial Hemp are almost undetectable.

At present, the current policy is denying Australians not only the enormous known health benefits of Hemp but the desperate agricultural sector the vital economic relief a Hemp Food boom could so effectively deliver for our export driven bio-based economy.

While other Commonwealth nations like Canada are now innovating with Hemp in advanced applications composite hemp polymer plastics, hemp sound proofing and use in automotive parts & superconductors, Australia's elected leaders and law enforcement still struggle to distinguish between Cannabis the medicinal drug and Low THC Hemp seed products with important nutritional outcomes.

The North American hemp industry, led by Canada, will exceed \$1 billion in revenue in 2016. Canada pioneered the modern hemp food industry in 1998 enjoys a head start in a huge growth industry with new harvesting equipment, large scale processing facilities and big corporate investment. The North American Hemp market is growing at 24% in wholefood retailers with Manitoba Harvest approaching \$100million in sales in 2015, processing millions of acres of hemp annually for Hemp bars, seeds, drinks, proteins and oils. Canadian hemp farmers earn up to \$250 per acre, more than ten times what corn delivers. Hemp production uses half the water and no pesticides allowing dry cropping in places that have been ravaged by climate change and drought.

Hemp based Food & Beverage products would comply with the revised Food Standards Code in terms of traceability & likely earn the maximum 5 out of 5 stars in the new 5 Star Health Rating System. This volunteer system, of which Australian Hemp food companies would be eager to join, is aimed at educating grocery buyers and also consumers about how to shop for healthy food.

With mining boom now slowing GPD growth, this is our nation's opportunity to re-invest in domestic vertically integrated Agriculture and export 'Brand Australia Foods' to Asia and the world. Companies like Bellamy's Organic, Blackmores, and A2 are fantastic Australian exporting showcase brands and examples to follow. Our standards of food safety and pristine agricultural are globally recognised, especially amongst the growing Chinese middle class, who place little trust in locally grown food products and look to Australia for their important health outcomes. Asia's demand for premium Australian foods & wellness products is growing enormously domestic demand for products is attracting big foreign investment to leverage off our agricultural resources and capabilities. Hemp is at the cutting edge of this demand and the possibilities for food innovation are endless as it outperforms all superfoods like Chia, Goji Berries and Acai for nutritional benefit.

If Cannabis is the medicinal drug variety then the oily seed produced from the Hemp plant is most certainly a food, not a drug. Low THC Hemp is a purely 'cousin' strain of the botanical plant Cannabis Sativa with below detectable levels of THC, (delta-9-tetrahydrocannabinol) the naturally occurring psychoactive essential for Medical Cannabis applications. CBD or Cannabidiol, is also another major compound of Medical Cannabis that is non psychoactive in nature and has been demonstrated in clinical trials to play a major treatment role in epilepsy and other neurological disorders. Australia also lags well behind Canada on embracing Hemp as a superfood and also Medical Cannabis who have a national cultivation production and patient access system for over ten years.

The Hemp plant is an entirely different from these psycho-active and non psycho-active cultivars (strains) of Cannabis & therefore scientifically unable to interfere with Police saliva drug tests. Scientific testing facilities within Australia can prove Hemp products results are safe for TDI of THC and CBD at ChemCentre in Perth. Mass Spectrometry/Gas Chromatography testing of hemp products for THC is available at ChemCentre to deliver scientific evidence that hemp products comply with standardised limits. This capability can be embraced by law enforcement who are still delaying this emerging industry with concerns of THC interference. These results & outcomes should give confidence to all relevant groups that Low THC hemp food products are safe for consumption and Hemp can be officially distinguished from Cannabis in Australia & New Zealand.

Multiple landmark changes at the macro level provide more reasons the domestic Hemp food policy needs immediate reform. In 2015, the Tasmanian State Government outlined the AgriVision 2050 plan, a \$10 billion State & Federal Government agriculture investment program that aims to improve and scale Tasmanian agriculture into farming new cash crops. Hemp should be #1 priority.

A key obstacle for AgriVision 2050 to deliver success for Tasmania is incentivising farmers to grow cash crops. Tasmanian farmers are hesitant to grow hemp at scale because there is no downstream demand for Hemp Food products that require large amounts of raw hemp seeds required for Hemp Food products. Current supply of Australian Hemp seed is inferior for premium food applications compared to Hemp seed from North America. Canada is growing the best quality hemp at scale and serving the USA where the situation is reversed; cultivation of hemp is prohibited, but consumption is approved. Our industrial hemp is of unknown strain variety which has primarily been grown for textiles, animal bedding and oil derived cosmetics.

Another big obstacle to domestic success is still upstream with farmers. There is also no official recognition or approval through the Department of Agriculture to import globally recognised cultivars or strains low THC hemp cultivars like FINOLA and X59 which are grown widely and specifically for food applications in Canada. Both FINOLA and X59 produce hemp seeds which are rich in oil and produce large yields at global limits of 1 PPM of THC (1%) and would suit our agricultural conditions. The FMCG market for organic Hemp based foods is the ideal platform to ignite an Australian & New Zealand agricultural boom if the Hemp consumption ban is updated in line with the rest of the world.

Lyn Stephenson, the President of the Industrial Hemp Association of Victoria has confirmed this market, if allowed, is poised to deliver a new agricultural boom and the Government must stop *"being an obstacle to economic growth when Hemp has been proven safe"*. The meeting of the Food Standards Australia New Zealand Ministerial Forum in January 2015 saw Food Safety Minister Jo Goodhew voted in favour of adopting a standard allowing the sale of hemp seed food products, and it's up to a ministerial decision to allow changes. New Zealand Hemp Industry Association treasurer Richard Barge said *"it was now when, not if, a hemp seed food standard will be adopted in New Zealand"*

Australia has demonstrated its ability to grow controlled drugs. Through pioneering the opiate derived medicines industry in the 1960's, Tasmania has regulated & controlled cultivation of poppy's and now controls over 50% of the world's opiate derived medicines. This growth industry has driven huge investment into the state as demand increases. Hemp Seed crops can legally be grown under licence in Australia but the domestic industry has not flourished because of the limited & inconsistent downstream demand for seed or oil derived Hemp products. The problem also access to better germinating hemp seed variety's to produce the best local hemp food products in our pristine agricultural lands.

Bangalow based Hemp Foods Australia have been operating effectively as a producer and supplier of Hemp based food products in Australia for over 10 years. In June 2016, this company reported a growth of over 400%, distributing and exporting their brand of Hemp Protein, Hemp Oil and Hemp Seeds sold with an 'external use only' warning label. Hemp Foods Australia were recently awarded a \$660,000 AUD Federal Government R&D grant, which was a unprecedented investment for the Hemp industry but also an example of contradicting Federal Policy as domestic consumption of hemp is still prohibited.

The recent article in The Australian *'Hemp as a health food crop'* 21 March 2016 outlined the current Government position on Hemp is not only out of date but costing this country new economic growth and a multi-billion dollar agricultural boom in farming jobs and innovation.

The article references FSANZ twice *'safe for consumption recommendation'* of Hemp Food products meaning it's approval remains effectively a 'rubber stamp' decision for the Federal Minister Fiona Nash. This is a great opportunity to the Government to deliver on its promise to invest in innovation and get out of the way of commerce & give birth to a huge new growth industry.

Cultures around the world have been farming, trading and celebrating the Hemp plant for centuries. Hemp has incredible healing powers & research has shown that this nutritional oil was once an essential agricultural crop and part of worldwide dietary intake.

Hemp has had a long-standing relationship with humanity; it can deliver enormous multi-serving applications and important health benefits. A vertically integrated Australian Hemp Products exporting nation can feed a hungry Asian market delivering generational economic growth to Australia. Hemp crops are also hardy and better suited to our drying environmental conditions, helping us better manage our land resources. A Hemp food industry adds value to support industries as like renewable Hempcrete homes, Carbon Cap & Trade & Hemp Biofuels as 'green' investment & superannuation flows into sustainable & ethical bio-based industries.

With State and Federal Government support, a Hemp industry can help kick-start innovation & secure our economic future, while improving the biosphere helping reverse the damaging effects of a changing climate.