



TASMANIAN FARMERS & GRAZERS ASSOCIATION

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FSANZ Report on Application A1039 Low THC Hemp as a Food

The Tasmanian Farmers and Graziers Association (TFGA) is the leading representative body for Tasmanian primary producers. TFGA members are responsible for generating approximately 80% of the value created by the Tasmanian agricultural sector.

In 2009/10, the farm gate value of agriculture and fishing was \$1,683 billion – which represented approximately 6% of the gross state product. More than seventeen thousand people are directly employed in farm related activities. Taking into account basic multiplier factors, this meant the farm dependent economy contributed c\$5.4 billion dollars (18%) to gross state product and 1 in 6 jobs.

With our purpose being to promote the sustainable development of Tasmanian primary industries, the TFGA is committed to ensuring that the agriculture sector in Tasmania is profitable and sustainable. We are also committed to promoting the vital contribution the agricultural sector makes to the environmental, social and economic fabric of the Tasmanian community.

Industrial hemp offers an important diversification opportunity for farmers, which we have been made aware through our members. Hemp is in wide demand in the global marketplace. It has many uses including ropes, clothing and food substances. Tasmania is well positioned to provide a quality product to meet this demand. Trials have shown that hemp can be produced efficiently and cost competitively here and growers are keen to rise to the challenge.

Comments to Report

The TFGA welcomes the opportunity to make comment to the FSANZ report on application A1039 Low THC Hemp as a Food. The TFGA has only answered questions from the FSANZ Report that relate to our understanding and experience.

Are there other methods of distinguishing between the seeds of hemp and drug varieties of cannabis?

One of the main reasons hemp is so tightly controlled is the inability of police to readily distinguish between Cannabis grown marijuana and industry hemp plants. Gene markers could be used to change the colour of industrial hemp to aid in easy identification.

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Dr. Paul Mahlberg of the Biology Department at Indiana University, in the United States began a pilot study to develop a morphological marker in fibre strains to enable law enforcement officials to distinguish between hemp and marijuana.

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

The Canadian hemp industry provides a good analysis of other costs, as they grow hemp for both fibre and food. In addition to the typical expenses associated with agricultural production growing industrial hemp has some additional expenses, including police security checks, considerable regulatory paperwork, GPS requirements and THC sampling and testing.

However, dual purpose crops have an advantage in costs of production, as you have the advantage of using the plant for both fibre and food.

To remove the regulatory barrier that currently is in place, where hemp can't be used in food products, it will provide growers and the industry another market to sell their harvested product.

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

Currently, the biggest entry barrier to a hemp food market in Australia is government. Firstly, the Australian Government for not allowing low THC hemp as a food and secondly on a state level the regulatory burden imposed upon growers to be able to grow hemp.

By broadening the range of products that industrial hemp can be used for will increase the amount of growers who will consider growing it more favourably, economically and environmentally.

FSANZ Preferred Approach: To prepare a draft variation to Standard 1.4.4 – Prohibited and Restricted Plants and Fungi to permit the use of processed hemp seed products only (including hulled hemp seed, but excluding whole and viable seeds) as a food with maximum delta 9-THC levels.

The TFGA agree with the preferred approach to permit the use of processed hemp seed products only. However, with plant technology the issue of whole and viable seeds could be ruled out if gene markers were successfully developed for industrial hemp seed.

If you should wish to further discuss any of the points raised in this submission please contact me on 6332 1800.

Yours sincerely



Jan Davis
Chief Executive Officer
15th February 2012

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