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A 1039: Low THC Hemp as Food Submission

Hemp Gallery has been involved in the importation, manufacture, wholesale and retail of hemp textiles and associated hemp products for more than 15 years.

Informing the general public about sustainability, history of agricultural hemp and hemp as a solution to ecological and economical problems has been a major activity of our business. This has been achieved by speaking at forums, tertiary institutions and at sustainability and design events.

Over time we have been encouraged and rewarded by increased public awareness of the benefits of low THC hemp seed (in fact Hemp seeds contain no THC) as a source of nutrition.

A plant that can provide all basic human needs such as food, energy, fibre, building material and plastic without harming the environment is a huge opportunity for not only Australia by the World.

We were at a loss to understand the reasoning of the Queensland Health & Ageing Department in their Submission made earlier this year. Testing has shown there is no THC contained in Hemp seeds and on this fact alone the objection, by the Q D H & A, should be disregarded. It would seem that the whole focus of their Submission was based on Tetrahydrocannabinol yet no products, the subject of the FSANZ Application, contain this substance. Research has been undertaken, worldwide, and there is well documented data and information readily available on this subject.

The Hemp Food industry is well established, and rapidly expanding, in countries such as Canada, USA, UK and Europe. These countries have experienced annually turnovers in tens of millions of dollars with the hemp food industry in Canada alone turning over \$420 million annually.

The passing of Hemp food legislation in Australia will, at last, enable food manufacturers to innovate and market a range of products high in protein and rich in omegas that will offer a genuine health benefit for the consumer.

At Hemp Gallery we are constantly asked about hemp milk, hemp butter and hemp energy bars, by European clients, and must explain these products are illegal in Australia due to inane reasons. Hemp food legalization would enable Australian Companies access to a growing worldwide market.

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The ability to provide an alternative, Australian grown source of unadulterated essential fatty acids (Omega 3 & 6), protein and amino acids is, surely, an important component of future food security in Australia, especially towards 2050 and beyond.

There is no rational defense for the current prohibition of Hemp foods in Australia. Its benefits as a food source are well established and issues of regulation have been resolved in the countries where sales are legal.

Passing this hemp food legislation will make possible a locally grown and processed range of products that will provide employment and a wealth of opportunities for Australian food producers. Australia is ready to move forward in this agricultural based multi-billion dollar industry.

Seed varieties have been developed, a national data base of farmers and suitable growing regions have been compiled and processing and harvesting facilities now exist for the productions of Hemp food products.

Australia wide, Industrial Hemp Associations are working hard to connect farmers who grow hemp with innovators, manufacturers and farmers considering hemp crops. This not only involves the seeds but stalks make extremely strong building materials along with plastics. Products have been developed here in Australia but unfortunately have been commercialized in China.

It would be irresponsible and inexcusable to disregard this highly nutritious, versatile and sustainable agricultural resource due to 70 years of misinformation and unfounded prejudice. Now is the time to move towards regional development and future self sustainability.

Along with hundreds of Australian farmers, innovators, manufacturers and retailers along with tens of thousands of consumers, we at Hemp Gallery are hopeful that the relevant governmental body will move to amend the current legislation in Australia.

Questions for Submitters: Attempted by Ray and Beatrice Rankin of Hemp Gallery

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

A. No, As a growers license holder, the farming of hemp is strictly controlled by the Department of Agriculture and supported by a 3rd party tests. Currently, hemp foods sold in Australia are guaranteed to be lower than 10 ppm.

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. To our knowledge only by dna testing.

3. Are there other methods 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 those methods.

A: Once the husk has been removed and the nut splits open, it would be impossible to germinate it and there is NO THC content in both industrial variety and the drug variety.

4. Are you aware of any studies reflecting the effect of consumption of hemp foods on the results of THC tests?

A. Feedback from a number of competing, world standard athletes we get is, they would be more worried to consume poppy seed roll for breakfast as it has higher narcotic content then their hemp supplements. (one example from the US 2010 Mr. Universe winner who complimented hemp protein for his optimum fitness level and health)

Just recently 2 members of the Industrial Hemp Association (IHANSW) have conducted <http://youtu.be/wlvMjRAMxCE>

5. Can you provide information on the type of saliva tests that are available including sensitivity of the tests?

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. The Police Department mainly use Securetec Drug wipe for road side saliva testing.

http://www.securetec.net/cms/upload/Produkte/DrugWipe/DW_S_Instructions_70058-v02-EN-110322_150dpi.pdf

Also please refer to the previous link <http://youtu.be/wlvMjRAMxCE>

7. Provide information on the methodology of these tests and the costs of conducting these tests?

A. Please refer to the submission by the President of IHA VIC Lyn Stephenson for details who has employed a toxicologist to prepare the required tests info@hempvictoria.org; www.hempvictoria.org).

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)?

A1- THC and other compounds from cannabis can be detected in the blood and urine for some time after marijuana has been used. These

compounds can be stored in body fat, to be gradually excreted from the body. For infrequent users of marijuana, a single occasion of use may be detectable in the urine for several days. Long-term heavy users of marijuana may have cannabis compounds detectable in their urine for many weeks after their last use of cannabis. However, it is difficult to determine how recently a person has used cannabis from blood or urine tests.

A2- The time that it takes before the average person will stop testing positive for THC is extremely variable and dependent on several factors. THC is the only one of the illicit drugs that is stored in the fat tissue, so it can take longer to be cleared from the system. Every individual has a different body size and shape and metabolism, which are all factors in how quickly the drug will be eradicated.

A3- The concentration of THC can also vary greatly between plants, from 1-30% of the total dry weight, thus a person who ingests or smokes marijuana with a very high THC level will probably take longer than someone who has taken marijuana with a low THC level to clear the drug from their system. It is very dependent on how much an individual has smoked, how often, what they have smoked and how long they have been smoking.

A4- Usually someone who has one dose of marijuana and is not a common smoker it would probably take between 1-4 days to be cleared from the system, but for a very heavy and constant smoker it can take up to 4 weeks. For a very heavy and constant smoker, with some form of metabolic disorder, i.e. Hepatitis C, it can take up to 8 weeks.

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

A- Medvet employ over 115 sample collection staff and provide drug testing in all states and ACT <http://www.medvet.com.au>. Or Concateno manufacture Cozal Oral Fluid Kits which are also used for drug testing www.concateno.com

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 level of THC?

A. As discussed earlier the THC level in current Hemp foods is less than 10ppm.

As hemp seeds contain no THC, hemp foods can be produced to comply with lower THC levels as it is already strictly controlled by the DPI.

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

A- Australian seed breeders have a variety of suitable hemp seeds which are already low in THC and therefore no additional costs are incurred.

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. In our experience, even in the economically challenged times, sustainable industries including hemp, continue to grow. There are more and more sustainable retail and online businesses starting up requiring sustainable products, where now most have to be imported

Hemp, being such a versatile plant can duplicate anything made of cotton, oil and timber; therefore as our earth's natural resources dwindle with years of pillage, the demand for non fossil fuel industries and products will be imperative. Hence, the increased demand for hemp farmers in the years to come.

Nature of hemp being bulky for transport, it would be best to set up a processing plant within the growing areas in every region in every State.

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

- A. The Canadian Government would be happy to provide all information and guidance on these matters as they have successfully regulated their hemp industry and now have an industry worth more than \$400million

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

- A. Countries like Canada or China with significant Industrial Hemp food industries may impose tariffs to protect local enterprise.

Yours faithfully

Beatrice Kuyumgjan Rankin

HEMP GALLERY