

To:
Food Standards Australia and New Zealand (FSANZ)

Submission in relation to FSANZ Application A1039 - 'Low THC Hemp As A Food'

From:
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Dear Sir/Madam,

I write in support of Application A1039, 'Low THC Hemp As A Food'. My support for this Application is based on my strong belief that the hemp plant is a highly valuable commodity crop, with an essentially untapped multitude of uses that include food for humans, as well as many other applications; from bio-fuels to building materials, paper, rope, clothing, cosmetics and healthcare, to list just a few. I will attempt to keep the bulk of my submission relevant to the particular issue of hemp as a food source.

My own sources of enlightening information primarily originate from two books I was exposed to a decade or more ago: '*The Emperor Wears No Clothes*', by Jack Herer (ISBN 0952456001), and '*Hemp: Lifeline To The Future*', by Chris Conrad (ISBN 0963975412). Both of these books contain a plethora of information and facts about hemp (the commodity), cannabis (the plant), and marijuana (the drug). They both also give a great deal of information about the relatively recent comprehensive prohibition that cannabis has been subject to, and the reasons and motives behind the classification of cannabis as a 'poison' and its blanket listing as an illegal narcotic. I strongly recommend these books, complete with their obvious bias in favour of the cannabis plant and its derivatives, to anyone wishing to gain an understanding of the 'cannabis issue'.

I find it quite disheartening that here in Australia, in the year 2012, we seem to be one of the last bastions of an almost-comprehensive ban on the cannabis plant. Even in the USA, the originator and principal champion of global cannabis prohibition, there have recently been some relaxations in various states on various aspects of cannabis law. I believe it is now time for some common sense to be injected into the regulatory system in Australia that discriminates so vehemently against cannabis; mostly for no justifiable reason.

WHY HEMP SEED SHOULD BE PERMITTED AS A FOOD

The use of hemp seed in all its forms as a food should be permitted in Australia and New Zealand. Some of the reasons for this are as follows:

- Unless contaminated during harvesting or processing, there is no psychoactive component in hemp seed
- Hemp seed is a highly nutritious food, with a unique and healthful ratio of essential fatty acids
- Hemp seed cultivation is a low-impact agricultural pursuit, which can readily be incorporated into existing agricultural crop rotations, and aids in diversifying farming options and assists in maintaining domestic food security
- A vibrant hemp industry would become possible if licensed growers were able to harvest and sell hemp seed into the food market
- Innovation in cultivation, harvesting, and processing would be driven by the introduction of hemp seed products into the consumer food market

OPPOSITION TO APPLICATIONS A360 & A1039

I have researched some of the reasons given for opposing this Application, from online sources including transcripts of talkback radio programs, statements from political spokespersons as well as the FSANZ documentation pertaining to this and the previous, unsuccessful, Application A360. Some of the justifications I have seen for the continuation of the *status quo* have been, frankly, ridiculous. The following two positions are of particular concern, and I believe the arguments put forward by the respective protagonists should be ignored; as they are NOT valid reasons to continue the current regime of almost-comprehensive prohibition of cannabis:

- “not in the interest of public health and safety” (WA Food Advisory Committee)
 - My response: This is an untenable position, which completely contradicts all known information about the nutritional benefits of hemp seed as a food, as evidenced by the overwhelming support of the nutritional quality of hemp seed by many qualified submitters to this current and the previous Application
- “marketing which allows the presence of Cannabis will result in the gradual community acceptance of Cannabis as a benign drug, and is a challenge to the Qld government’s current anti-drug stance” (Queensland Health, Environmental Health Unit)
 - My response: Concerns of this nature are easily abated by the establishment of a licensing and regulatory framework that precludes promoters of hemp food products from employing confusing and inflammatory claims, potentially controversial logos and slogans, etc. For example, I believe it would be reasonable to not allow the use of a ‘marijuana leaf’ image on the labeling of hemp food products, if this was deemed necessary to aid in the passive public education process which disconnects the plant from the drug

I believe the primary reason for the Ministerial Council rejecting the previous Application A360 is related to that last misplaced belief that permitting hemp as a food will somehow ‘open the gates’ to the widespread acceptance of cannabis as a recreational drug.

I am reassured by the comprehensive research undertaken by FSANZ for both Applications and sincerely hope that the Ministerial Council will see fit to assess the Application on the basis of its merits. If I could be so bold as to offer the relevant decision-makers one piece of advice, it would be this: Policing is for police; this is about food, pure and simple.

CONCLUSION

In conclusion I would like to make the following points, which form the overarching reasons I felt compelled to submit to FSANZ on this Application:

1. Hemp seed should be allowed as a food for humans in Australia and New Zealand. There are no real issues that should prevent this. There is nothing new or novel about the use of this food source.
2. The market for hemp seed products would generally be an educated, adult demographic, with well-researched general or specific reasons for wanting to consume hemp seed food products. Nutritional benefits of hemp seed should be celebrated and promoted, not hidden, obfuscated or disallowed.
3. Consideration should be given to the fact that certified 100% Organic hemp seed would be a key desirable element of the new hemp seed industry (sterilisation of seeds shouldn't be necessary).
4. A positive result for this Application would help to create an entirely new food industry sector, and contribute significantly to Australia's future food security. It would also be a positive diversifying element for agriculture in many regions and should contribute to a net decrease in use of irrigation, fertilizers, herbicides and pesticides.
5. The unrelated 'drug' issue should not be allowed to confuse consumers or prevent the introduction of hemp seed food products into the food market. There are ways that regulations could be established or enhanced in order to prevent sensationalist or provocative language, imagery and slogans in the marketing of foods containing hemp seed by marketers alluding to the psychoactive effects of compounds which are simply not present in the seed of the cannabis plant.

I wish FSANZ success in having hemp seed permitted as a source of food for humans in Australia and New Zealand.

Regards,

Adam S. Gray