

## Seamons, Colleen

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**From:** gnostic hemporium [gnostichemporium@hotmail.com]  
**Sent:** Monday, 11 April 2011 12:39 PM  
**To:** submissions  
**Subject:** Application A1039 - Low THC Hemp as a food

**Categories:** Blue Category

Regarding; Application A1039 - Low THC Hemp as a food

Name; Richard Harvey  
Email; gnostichemporium@hotmail.com  
Business Owner of; Hemp Store  
Address; 19 The Boulevarde, Woy Woy, NSW, 2256  
Ph. (02) 4344 2300  
Fax (02) 4344 2300  
Mob. 0438798323

As the owner of several Hemp related businesses, I find it extremely frustrating that we, as a society, have been denied this highly beneficial and nutritious food for this long already.

It makes no sense to continue with this ancient legislation prohibiting the sale of Low THC Hemp foods. There is no health risk, only health benefits. There has been no documented negative issues relating to the sale of Low THC hemp foods anywhere in the world in the past 10 years. Low THC Hemp seeds and oil are sold throughout supermarkets and health food stores in the UK, Canada, USA, Germany and most other western countries with no issues other than the increasing health of those who choose to consume them.

If the Ministerial Council should choose to reject Application A1039, it should be because they have gathered and provided evidence and data that supports their decision.

### Discussion points

1. Are you aware of any evidence that consumers believe that low THC hemp foods have psychoactive effects?
  - No, I am not aware of any evidence that exists. Low THC Hemp Foods are considered as and marketed as a health food.
2. Are you aware of any evidence that representations on low THC food (including labelling and advertising) mislead consumers by leading them to believe that low THC hemp foods have psychoactive effects when consumed?
  - No, I am not aware of any evidence that exists. Low THC Hemp foods are marketed as a health food and would have to abide by current labelling laws regarding false or misleading claims.
3. Can you provide any evidence in addition to that presented in this consultation paper whether or not the consumption of low THC foods can return a positive test for a THC drug test?
  - No. There has been no evidence regarding positive tests for THC during the last 10 years in the countless countries that already allow the sale of Low THC hemp foods. This includes many elite athletes who rely on hemp's high protein levels to help them with their dietary requirements. If there were any issues then surely Hemp foods would have been subject to much more scrutiny in the countries that allow it and we would be able to find evidence in addition to what is provided in this consultation paper.
4. Can you provide information on THC testing in Australia and NZ, particularly with regard to regulatory limits of THC that may be set?
  - No.
5. Can you provide information to indicate whether there will be an impact on the cost of testing for THC in humans that could arise from an approval of hemp foods?

- No, companies and government already test for drugs in the workplace and on the roads, there would be no reason to increase these tests.
6. Do you agree that there are adequate controls currently in place, or that would be achieved by imposing maximum limits for THC, to mitigate any risk of high THC Cannabis varieties entering the food supply?
    - Yes, I believe current growers of Low THC-Hemp are already subject to adequate controls and measures to ensure that only Low THC-Hemp is grown and harvested.
  7. Do you consider that trade practices legislation in Australia and New Zealand is sufficient to mitigate the potential risk that representations (including labelling and advertising) of hemp foods could suggest psychoactive properties relating to consumption of those foods? If not, what labelling and representations of hemp foods should be considered?
    - Current labeling laws and advertising legislation are sufficient. Misleading labels and advertising are not permitted at the moment
  8. What is the potential opportunity costs for current producers of hemp crops if hemp foods continue to be prohibited?
    - The potential opportunity costs would be zero as the current harvesting machinery would be adequate and does perform well already for seed harvesting. The opportunity lost for current producers, however, would add up to the millions.
  9. What are the potential benefits to food manufacturers if hemp foods were approved for use?
    - The potential benefits are limitless.
  10. Are there likely to be any additional costs for food manufacturers wishing to supply hemp foods?
    - That depends on what food they would like to create and whether they are producing a similar product already.
  11. Would the approval of low THC hemp foods increase the cost of food enforcement beyond what would be expected of the approval of any other substance added to food, or other food regulatory change?
    - No.
  12. What other legislation would affect or be affected by approval of hemp foods?
    - Customs/Import regulations?
  13. Would the approval of hemp food have an impact on hemp regulations in Australia and New Zealand? Would industrial hemp destined for use in food require additional controls to those already specified in industrial hemp regulations?
    - No.
  14. Would food manufacturers be required to be licensed under existing hemp regulations?
    - No
  15. Would additional costs be incurred by government agencies responsible for granting licenses for the cultivation of hemp as a result of approval of hemp foods?
    - Yes, but current license applications attract significantly large fees, so any additional costs incurred by government agencies would be adequately compensated through these fees.
  16. Can you identify risk management options that have not been considered in the impact analysis?
    - No.
  17. Can you identify any other costs and benefits for any of the risk management options considered in this paper?
    - No
  18. Do you have a view about the appropriate preferred regulatory options regarding the approval of hemp foods, based on benefits and costs?

- Yes. The preferred regulatory options should be minimally restrictive as they are in the UK, Canada and much of the western world where the health benefits of Low THC Hemp foods are recognised.

Kind regards,

Richard Harvey

Hemp Store