

submissions

From: Paul Benhaim [REDACTED]
Sent: Thursday, 25 August 2016 4:26 PM
To: submissions
Subject: P1042 Comments - submission

Hemp Foods Australia agrees with the recommendation of FSANZ in general to allow non-drug industrial hemp as a food in Australia and New Zealand. Some comments that we do not believe are accurate and we have comment on are stated below:

Re: although a limit for CBD has not been included in the draft variation, FSANZ has proposed additional drafting to make it clear the draft variation does not permit CBD (or other cannabinoids), including CBD extracted or derived from seeds of low THC C. sativa, to be a food for sale or used as an ingredient in a food for sale

Hemp Foods Australia comment: CBD and other cannabinoids are naturally occurring and have been noted as not a public health concern. Recommendation: to allow all cannabinoids, except for the only psychoactive cannabinoid, THC

Re: However, traces of THC and CBD contamination of the seed may occur due to residual contamination of the outside of the seed coat, even under good agricultural/manufacturing practice. Rigorous cleaning methods, including washing, sieving and shelling, may help reduce or remove any cannabinoid contamination of seeds.

Hemp Foods Australia recommends all manufacturers use washed and clean whole seed as a starting material for all food production for safety.

Re: FSANZ's discussion with the intergovernmental advisory group identified the Forum's concern relates to the potential for CBD-fortified products to be misused by consumers seeking to self-medicate for serious medical conditions such as epilepsy and to stop taking their prescribed medications.

Establishing a CBD limit that is not based on evidence of needing to protect public health and safety may be a decision that is open to legal challenge, although the likelihood of legal challenge is not known

However, in order to remove doubt, FSANZ has included additional text to make it clear the draft variation does not permit CBD, including CBD extracted or derived from seeds of low THC C. sativa, to be a food for sale or used as an ingredient in a food for sale.

Hemp Foods Australia comment: We do not believe that FSANZ has the legal ability to include such additional text, especially as CBD is not a concern for public safety.

People self-medicate with tea and coffee instead of rest, water instead of ibuprofen and other natural, non-harmful substances – therefore there is no logic to stop the public consuming harmless natural ingredients that may be good for them, that FSANZ has identified as non-toxic and not a public health concern.

Paul Benhaim

Chief Executive Officer

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Hemp Seeds ► Hemp Protein ► Hemp Oil



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