

Submission on – Proposal P1042

Permit Foods Derived From Low THC-Hemp

Submission by:

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FSANZ submission on Proposal P1042

Permit Foods Derived From Low THC- Hemp

Proposal

FSANZ is proposing that food made from low-THC-Hemp be permitted in the *Australia New Zealand Food Standards Code (FSC)*.

I BELIEVE THAT THIS SHOULD HAPPEN BECAUSE THE SAFETY IS CLEARLY DEMONSTRATED BY...

"Hemp seeds and hemp seed oil are used in other countries, including in Europe, Canada and the United States of America, in a range of foods including health bars, salad oils, non-soy tofu, non-dairy cheeses, and as an additive to baked goods. The whole seed, raw or roasted, can also be consumed."

Comments on the Proposal(s)

1. To address the Ministerial concerns expressed on A360 "that the availability of hemp foods may send a confused message to consumers about the acceptability and safety of illicit cannabis and pose problems for drug enforcement agencies", P1042 approval should be conditional on appropriate labelling:

- The word "Hemp" only being used on labelling (not Cannabis or Marijuana)
- No use of the Cannabis leaf on labels or marketing materials
- Meeting ACCC Guidelines for misleading and deceptive advertising or claims...not inferring psychoactive content or benefits,
- Absence of health claims unless substantiated and FSANZ approved.

In addition clear definition is needed for:

- What are foods derived from hemp seeds.
- Which hemp products can be used or not used
- What foods can have hemp products added to them and what percentage (as this would be a factor in diluting the already low-THC present)
- What is a maximum recommended daily intake of low THC hemp from all sources

All Low-THC Ingredient suppliers be registered and have Certificates of Analysis that demonstrate the low THC level of seed stock and finished products.

2. To address the Ministerial concerns expressed on A1039 where "further work would be undertaken to consider:

-marketing concerns" (see points raised for A360 above)

-law enforcement and roadside drug testing. "Ministers also confirmed that results of a study into the impacts on roadside drug testing would be available later in the year" This impact study must include data from Europe, Canada and the USA on how it is policed and whether current Australian saliva test methods would be triggered by non-THC-cannabinoids found in Hemp.

Closing remarks.

The measures suggested above would ensure that:

- food manufacturers are given clear boundaries to work within
- a confused message is not sent to consumers about the acceptability and safety of illicit cannabis
- the efforts of drug enforcement agencies are not undermined.