Ministry of Health PO Box 5013 Wellington

15 September 2015

Dear Director General of Health - Chai Chauh, Minister of Health - Hon Dr Jonathan Coleman and Associate Minister of Health - Hon Peter Dunne.

The Executive of the NZHIA seek your support for a review of the industrial hemp regulations 2006. We encourage the Ministry and officials to refer to the two distinct types of cannabis. Industrial hemp-cannabis is defined in the regulations, if MODA wants to control marijuana-cannabis then it should clearly define this and the controls required to minimize the harm associated with this drug.

Industrial hemp (IH) is not a drug. The object of the Industrial Hemp Regulations 2006 is to enable the cultivation and distribution of IH under a licensing regime that ensures other forms of cannabis are not cultivated and distributed under the guise of industrial hemp.

Respectfully these "other forms of cannabis" need to be defined. If they relate to marijuana as a drug, then the MODA controls should be aimed at minimizing the harm as a drug, if this was the case many of the political barriers to the legitimate IH industry may disappear.

The public needs to know the difference between the two forms of cannabis. Medicines Control needs to differentiate between the two and have a policy of not calling it cannabis as not all cannabis is the same; it is either IH cannabis or if you are referring to the drug then please call it marijuana cannabis.

Focusing MODA on the control of marijuana cannabis would remove the reputational risk around IH cannabis and allow the IH industry to develop.

We understand IH is a crop that must be subject to control and the hemp regulations are a great start. The regulations allow us to grow a prohibited plant under a Government issued licence and clearly define IH and confirm only IH can produce hemp products.

However because MODA overrides the IH regulations we are constantly thwarted when developing markets for anything other than the chaff and seed oil.

Not being able to commercialize IH products which have mainstream markets internationally is stopping the potential for farmers and local businesses to add value to this agricultural crop.

Website: www.nzhia.com.

We can help New Zealand meet the UN Sustainable Growth Goals, by creating employment and economic opportunities, while revitalizing rural New Zealand.

Therefore a review of the regulations is required to tidy them up and make them workable for both the ministry and industry, acknowledging that IH is not a drug, it is just another agricultural crop similar to its's cousin Hops.

It is timely for this review of the regulations in light of the work being done by Hon Jo Goodhew, our Food Minister on allowing access to hemp seed foods.

The NZHIA have been lobbying for the development of the New Zealand industrial hemp (IH) industry since 1997.

During the trial period 2000-2005 we represented the industry on the Governments Inter Agency Working Group, which resulted in the Misuse of Drugs Act, Industrial Hemp Regulations 2006.

In 2000 the NZHIA Chairman, Mack McIntosh raised the issues with the working group.

At the time the Ministers and officials publicly stated that the issues would be addressed and would not impede the development of the IH industry. Respectfully 10 years after the regulations were set up these issues are still unresolved.

With our industry perspective, it is important that the NZHIA be part of the review of the industrial hemp regulations.

We offer our expertise and network to represent the industry on the working group required to review the regulations.

We have begun this process by forwarding to your officials information on the issues we feel need to be considered.

We look forward to working with the ministry on this review.

Kind regards

Mack McIntosh

Chairman

Richard Barge

Treasurer

Penny Young

Secretary

Website: www.nzhia.com.

PO Box 38-392. Howick, Auckland. New Zealand.

D.J. (Mac) McIntosh (Chair) Ph:+64 3 415 8888 <a href="mailto:anzhemp@gmail.com">anzhemp@gmail.com</a>
Richard Barge (Treasurer) (Secretary) Ph +64 21 706 960 <a href="mailto:richard@hemptastic.co.nz">richard@hemptastic.co.nz</a>
Penny Young (Secretary) Ph +64 27 210 3435 <a href="mailto:penny@moumoukaihemp.co.nz">penny@moumoukaihemp.co.nz</a>
Tom Brown (Executive Member) <a href="mailto:thomas@thomasbrown.org">thomas@thomasbrown.org</a>