**Submission to the Agricultural and Horticultural Products Regulatory Review**

[Insert Date]

To Whom It May Concern,

Thank you for the opportunity to provide feedback on the regulatory review concerning agricultural and horticultural products. I am writing to express my strong support for the industrial hemp industry and advocate for the full utilization of hemp plants to realize revenue streams from all parts of the plant.

**Current Issues and Challenges**

One of the significant challenges facing the hemp seed food industry is the lack of access to the secondary animal food market for non-human grade co-products, which are produced when processing hemp seed into oil and hulled seed. The primary concern from MPI and ACVM (Agricultural Compounds and Veterinary Medicines) officials regarding the use of industrial hemp as animal feed is the perceived risk of THC and CBD metabolites remaining in milk and meat exported to sensitive markets.

While MPI and ACVM claim there is a pathway for approval, it often results in a no-win situation due to the requirement to demonstrate 0% THC or CBD. This is impractical as we can only provide lab reports showing non-detectable levels, down to below 0.05 mg/kg or 0.05 ppm. Scientists have critiqued this position, noting that it is unreasonable to require evidence of 0% THC or CBD, which cannot be practically achieved.

We need to understand how industrial hemp can help us with our regenerative agriculture plans, the Federation of International Hemp Organisations [Hemp in Livestock Feed, Global Review June 2024](https://nzhia.com/wp-content/uploads/2024/08/2024-08-06-FIHO-Position-Paper-Hemp-in-Livestock-Feed-Final.pdf), quotes “oilseeds that can be used in dietary methane mitigation”. The [paper](https://pubmed.ncbi.nlm.nih.gov/28188639/) reports promising initial results stated Hempseed oil being fed 70g per 1kg of dry matter resulted in an 18% reduction in methane in cows

**Proposed Solutions**

1. GRAS Designation: We urgently need a GRAS (Generally Regarded As Safe) designation for hemp seed foods to accurately reflect the existing evidence and provide a class determination that permits all hemp seed products to be used as animal feed or agricultural inputs, such as soil amendments.

2. Differentiation Between Markets: It is crucial to differentiate between companion and production animals, as they represent two vastly different markets with no overlap in terms of international trade regulations.

3. Understanding Residuals: Hemp seeds contain negligible levels of THC and CBD, as these cannabinoids are primarily present in the flowering tops of the plant. The residual amounts remaining on the seeds are non-detectable in most cases and do not have a lasting effect on the animals consuming them. The use of hemp seed in animal feed is not problematic in Europe, and similar progress is being made in Australia.

4. Learning from International Examples: The Federation of International Hemp Organisations has released documents providing evidence on the [safety of hemp seed products for animals.](https://nzhia.com/wp-content/uploads/2024/08/2024-08-06-FIHO-Position-Paper-Hemp-in-Livestock-Feed-Summary-Final-002.pdf) In the U.S., the Hemp Feed Coalition has recently gained approval from [AAFCO for using hemp seed cake](https://www.lancasterfarming.com/farming-news/hemp/aafco-votes-yes-on-hemp-seed-meal-for-laying-hens/article_10472d88-54e4-11ef-8190-27a4bf058cfc.html) as feed for laying hens, a development that could be replicated in New Zealand.

5. Local Opportunities: Allowing access to companion animal markets could stimulate industry growth without impacting exports. We could also begin with research and trial programs involving local farmers not engaged in exports, thus gradually opening up selected production animal markets.

**Conclusion**

Hemp seed food producers generate considerable quantities of co-products, such as hulls and seed cake, which, while valuable, currently lack a market due to regulatory constraints. These by-products can enhance soil health and animal diets, reduce veterinary costs, and improve the quality of meat and eggs.

The lack of access to the secondary animal feed market is impeding the scalability of the hemp seed food industry, leading to increased costs associated with [disposing](https://www.facebook.com/reel/817202270585268) of co-products that could otherwise be profitably sold. Utilizing these co-products in the animal food market could significantly improve the economics of the hemp food industry and support sustainable practices.

Thank you for considering my submission. I look forward to positive changes that will support the growth and sustainability of the hemp industry in New Zealand.

Sincerely,

[Your Name]

[Your Position]

[Your Contact Information]