



HEMP FEDERATION IRELAND

22/11/2022

Our Reference: MH/ JR 11/22

Dear Minister Donnelly,

Hemp Federation Ireland is very concerned by certain matters established as fact in a recent High Court judgement on hemp which was published on November 11th (a copy of which is available [here](#)); in particular, the Court's scientifically unsupported statements regarding the safety of EU hemp foods is likely to cause fear and alarm in citizens across Europe and to impact farms and businesses operating in the sector in all EU Member States.

As you are aware EU General Food Law Regulation (EC) No 178/2002 sets out an overarching EU framework for the development of food and feed legislation both at Union and national levels laying down the requirements and procedures that underpin decision making in matters of food and feed safety, covering all stages of food and feed production and distribution. The European Food Safety Authority is responsible for the scientific safety of all foods on the EU Market and European citizens are the best protected and informed food consumers in the world. EFSA considers all CBD extracts equally qualified as food, including those which contain THC, in line with established protocols.

Therefore, we request that the Department of Health issue an immediate clarifying statement confirming the World Health Organisation's advice that there are no safety concerns regarding

the THC content of foods containing 0.2% THC. We ask that you reconfirm the Food Safety Authority of Ireland's advice that it has no safety concerns regarding the THC content of any food product it is possible to make from the legal EU hemp crop. Including FSAI's advice that there are no safety issues related to the flowers of our crop. We ask that you acknowledge that products regulated as foods under EU law are not medicines or illegal narcotics and that you make clear that the European Food Safety Authority considers all CBD food extracts equally, including natural CBD which contains trace impurities of THC.

As you are also aware, the recent advice of the Climate Change Advisory Council and Bord Bia confirms the importance of the various potentials of the hemp crop and all derived foods in the context of climate change and scientifically authorised EU environmental policy objectives on which human life may ultimately depend. In this regard you are aware of the European Commission's agricultural policy focus for the hemp sector, building on the sustainability credentials of the crop. Therefore, if the Department of Health has new scientific evidence demonstrating a significant risk to human health, can you please confirm that you have notified the European Commission about it? I would be very grateful if you could confirm this by return as Hemp Federation Ireland will need to contact EU authorities for instructions on how the sector is to proceed?

Otherwise, I am certain you will appreciate the need to address this situation immediately and in a way that doesn't risk further unnecessary harm to all concerned. We respectfully request your urgent attention and immediate advice.

Yours sincerely,

Chris Allen

Executive Director

Hemp Federation Ireland