



Reg. A01128465

# Submission to Legislative Council Inquiry into

## How to Support the Hemp Industry

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Regenerative Hemp Victoria, Inc (RHV) is a non-profit, member-based organisation supporting the hemp industry in Victoria by fostering collaboration, integrity and respect, not only between members but also externally. We advocate for the industry and promote sustainability, environmental and economic mindfulness to preserve the planet for future generations.

We are a member of the seven member Australian Hemp Council (AHC), the representative body for the industry nationally. The position stated in this submission aligns with the aims of the AHC which is “primarily a grower and processor driven-and-funded organisation, focussing on addressing the issues impacting industry whilst engaging with Government and community”. We have the endorsement and support of the AHC to represent the hemp industry in Victoria.

We answer the questions you have put below.

### Issues, Barriers and Opportunities

- The continued conflation of hemp and marijuana, persistently propounded by some politicians, bureaucrats and the media. This leads to confusion in the public consciousness, resulting in a lack of knowledge of the potential for hemp to be both an economically and ecologically sustainable crop. It is a barrier to industry growth.
- Licensing restrictions and the inclusion of hemp in the Drugs Poisons and Controlled Substances Act impedes industry growth. Cannabis with a tetrahydrocannabinol (THC) content of less than 1% is not a drug. Cannabis and cannabis resin have been specifically removed from Schedule IV of the United Nations Single Convention on Narcotics 1961.  
Opium poppies are regulated and yet people can grow non-opiate poppies in their gardens without a permit. Psilocybin has recently been approved to be prescribed in Australia. This is the substance in so-called “magic mushrooms” yet people can still grow non-psychedelic mushrooms without a permit. Marijuana is regulated. Perhaps it is time for hemp to be permitted to be grown without a licence.
- Changes in legislation for medicinal cannabis have resulted in a burgeoning medicinal cannabis industry. The same opportunity is available to be applied to the hemp industry.
- The exuberance and passion of some early participants in the industry in Victoria has resulted in fanciful claims of productivity and returns on investment. This has impeded development of the industry when

early adopters have effectively been “burnt”. Qualified R & D to substantiate the potential for growing would be helpful as would the assistance of the enormous expertise of officers in the Agriculture Department and the Environment Department, to name a few.

- In the words of the Hemp Co-operative Research Centre (the CRC), the hemp industry needs: “Existing hemp markets strengthened and diversified; supply chains established; new products created and market sectors captured; innovation uplift achieved; data-driven policy and evidence; expanded industry expertise; new jobs, business and economic growth”.

The hemp industry operated in a fragmented way up until hemp food approval was granted Federally in 2017, and the formation of the Australian Hemp Council in June 2020. A partial explanation is that, as an emerging industry, individual participants in the industry have been guarded in their research and in communicating outcomes - apparently believing that they can either make a quick dollar then leave or become the wealthy leader in the industry. The former is evidenced by newcomers entering the industry, building their brand then quickly listing on the stock exchange. The latter has not occurred because, for a new industry to expand, co-operation between industry participants and the wider economy is paramount.

These issues are not specific to the hemp industry – most, if not all, emerging industries have these challenges. Since the food approval, more interest in hemp has emerged and industry associations have been established Australia-wide to foster co-operation. Entrepreneurs are beginning to develop new processing methods and new products and collaboration is now occurring.

Through both RHV and AHC, the industry in Victoria has become more cohesive. RHV operates solely on the time and effort of volunteers. Contributions from the State Government towards operations of the Association, promotional events and educational sessions would be of enormous benefit. Working cooperatively with the State government, we would welcome the opportunity to assist newcomers to the industry. Applications for licences could be more accessible on the Agriculture Department’s web site as well as a link to RHV’s web site for membership and further information.

## Specific Opportunities

### Challenges for the native timber industry

Now that the hemp industry has achieved better cohesion, the State Government has the opportunity to help progress the industry. Victoria lags behind all other States and internationally in development of the industry, even though legislation to grow hemp commenced here, 25 years ago, in 1998 (introduced by Jeff Kennett).

The bringing forward of the ban on native timber harvesting will impact employment in that sector. Retraining for those workers and redeploying them to the hemp industry would be a solution.

A hemp crop will mature in 3-4 months; a timber crop takes at least 25 years. Hemp can provide the raw material for paper, building products, furniture and many other uses. Curtis Koster, board member at the National American Indian Housing Council in the US, has also been long associated with new products research for the world’s largest paper manufacturer, International Paper. He says

“the low lignin content of hemp (compared to wood) makes it possible to pulp with less chemicals. Hemp produces a naturally brighter pulp. If bleaching is desired for maximum brightness, hemp is very conducive to hydrogen peroxide bleaching with the only byproducts being water and oxygen.”

Redeploying the timber industry workers to modify existing mills could not only provide workers with gainful employment (rather than pay a redundancy and leave them to find their own alternatives) but could also prevent obsolescence and scrapping of the mills themselves.

Well before the 1998 legislation was introduced, a paper was delivered at the First Australian New Crops Conference. The author pointed out (even that far back) that “Growers are not prepared to grow the crop unless they have assured long-term supplies of feedstock. The solution perhaps lies in a staged development in which the field production system is first established with the raw product being exported to an existing mill. Once the feasibility and viability of the production system has been established consideration can then be given to the establishment of a local pulping facility. A third stage could be the expansion of the enterprise to produce paper.” (*Jan M. Wood: “The Potential and Problems of Non-Wood Fibres and Fibre Crops as Feedstocks for the Pulp and Paper Industry” 1996*). [Note that this quote uses the term “feedstock” and should really be read as “contracts” to grow. “Feedstock” applies to processors].

Without a market to sell hemp products, the industry will flounder – farmers are reluctant to even experiment with a new industry until they have a proven market. So research and product development are important. Equally important is changing the public perception that hemp is a drug. The myriad uses and benefits of hemp need to be promoted. The attitudes of some bureaucrats need to change.

## The current Victorian industrial hemp industry compared with other relevant jurisdictions

**Victoria** was the first Australian State to legislate – 25 years ago - for farmers to grow hemp. Other States followed, the most recent being South Australia in 2017 when hemp seed food was approved nationally. Trials carried out in Victoria in 1995-96 are described in a paper “*Low-THC Indian Hemp (Cannabis sativa L.) Trials in Victoria*”, *Sam Lolicato, Chris Bluett and John Blackstock published for the First Australian New Crops Conference 1996*). It seems incredible that even after almost 30 years hemp production in Victoria has floundered, primarily because of a lack of government support.

Trials are now being conducted Australia-wide, funded by Agrifutures Australia but these could be supplemented with the local expertise of the Victorian Agriculture Department in line with its stated role: “to grow and protect profitable, sustainable farms in thriving regional and rural communities across Victoria”.

**Tasmania** is now leading the country in development of the hemp industry and significant funds have been invested in the industry both by the Tasmanian Government and the Federal Government. The **Tasmanian** achievements are almost equalled by **Western Australia** and **South Australia**. The Victorian hemp industry continues to languish. There have been many theories propounded for the reasons. One of these is the negativity expressed by the Victorian Police. This is evidenced by their apparent insistence that the Police Commissioner have the final say on licence applications (a new step in the licence approval process, introduced earlier this year and not one that is followed in other States).

Again, we have to state that hemp is not a drug. In fact, if anyone were to try growing recreational or medicinal cannabis (marijuana) amongst hemp plants, they would find the potency of their marijuana plants diluted by cross-pollination. This could even occur to any illicit crops grown within five kilometres of a legitimate hemp crop, because the crop is wind-pollinated.

In recent times, the **NSW** DPI has actively participated in the hemp industry by engaging with the Hemp Co-operative Research Centre (CRC) as one of its core research partners. They reported that,

“As of October 2021, there were 170 licensees under the Hemp Act in NSW, licensed to grow approximately 25,000 hectares.”

With Victoria’s six growers totalling 169 hectares, we have a lot of catching up to do.

The NSW DPI is considering ways to support the hemp industry in that State. Possible activities include incentivising for waste reduction in the hemp industry by either allowing it for animal feed, allowing low-THC hemp resins and proposing to FSANZ that they allow the leaf, seed sprout and root as a food. (See Discussion Paper – Amendment of the Hemp Industry Regulation 2016 (NSW) published September 2022).

## Nationally

The Hemp CRC, Chaired by Dr Kerryn Phelps, was unfortunately unsuccessful in its bid for Round 24 funding from the Federal Government. It is possible that they may pursue their project in the next round. In the meantime, the Victorian Government could potentially adopt at least some of the aims of the CRC and thus help advance the industry generally. Why wait to see whether approval of the CRC is granted?

The Hemp CRC's aims are:

“to provide an industry-led hub unifying:

Growers, Researchers, Suppliers, Policy makers, Local and national bodies, and End users to drive innovation and commercialisation of the Australian hemp sector and deliver economic benefits to the Australian community and economy.” Further, to “incentivise the hemp industry to create new sustainable economic opportunities for Australian growers and manufacturers ... Hemp is a crop of tomorrow and Australia has the land, resources, supportive legislation and expertise to become a global leader in the hemp market.” (<https://www.hempcrc.com.au/>)

The Victorian Government has an opportunity to align well with the Federal Government in its intentions to assist industry. Federal Treasurer, Jim Chalmers, in his Budget Speech 2023 underpinned the budget “by a plan to modernise our economy and maximise our strengths by:

- Making Australia a renewable energy super power with strong strategic industries in global supply chains ... [including] to support the development of green industries, manufacturing and more.
- Investing in our people and their skills ... a revamped 5-year national skills agreement with the states and territories
- And supporting small businesses to innovate and grow ... with a new Small Business Energy incentive to support investments in power saving assets.”

A full economic assessment of the potential for the hemp industry in Victoria is warranted – along similar lines to that which was undertaken for medicinal cannabis.

## Internationally

The **United States** only legislated to grow hemp in 2018 (20 years after Victoria). Their industry has progressed exponentially since then whilst the Victorian hemp industry has languished.

The Hemp CRC web site makes the point that “Australia sits 29 out of 30 in OECD rankings for industry-university collaborations and is ranked 23<sup>rd</sup> in innovation worldwide, but is at number 40 in knowledge and technology outputs. The ETP is expected to address this gap by co-benefiting the industry and research sector as well as fostering commercialisation of research. Moreover, this program will serve as an outreach and engagement platform for innovators to promote their business ideas, and help raise global awareness on the benefits of hemp”.

The above could equally be achieved by the Victorian Government, at least as it applies to our State. The choice is available to do a lot more to lead the hemp industry and not let Victoria sit at the bottom of the heap.

Internationally, the **United Nations Conference on Trade and Development** issued a detailed report (29 November 2022) entitled “Commodities at a Glance special issue on industrial hemp”. (<https://unctad.org/meeting/workshop-industrial-hemp>). In its summary it states,

“Overall, about 40 countries currently produce significant quantities of industrial hemp. However, due to a narrow set of hemp products covered by international trade statistics, recorded trade flows do not fully reflect the true size of the global industrial hemp market. Indeed, despite an estimated overall value of about USD 5 billion in 2020, trade in such products, as reported in international trade datasets, amounted to a mere USD 42 million.” and

“To fully exploit the potential of industrial hemp, countries would need to take specific actions. For instance, a clarification of the legal status of hemp as distinct from intoxicant cannabis substances

could be the first step taken by governments. A precise understanding of production constraints imposed by regulatory frameworks in destination markets would also be necessary to identify market potential. Regional cooperation to facilitate the establishment of production chains may also be a strategy for developing countries to consider.”

Cannabis and cannabis resin were specifically delisted from Schedule IV of the United Nations Single Convention on Narcotics 1961. This is the most restrictive Schedule. The removal was adopted on 22 January 2021 after a raft of recommendations prepared by the United Nations Commission on Narcotic Drugs. Australia voted “yes” for all the recommendations but only the delisting from Schedule IV was passed. So more representation and lobbying by our governments - both State and Federal - is needed.

“Along with legislative support, the EU has encouraged its hemp industry through economic aid for hemp growers and processors, generating renewed interest in this crop from various countries and industries. Over the 1990s, the research and development in industrial hemp contributed to changes in the perception of the controversial plant ... Almost 50 countries now grow hemp legally for commercial and/or scientific purposes.”

*(Rivas-Aybar, D.; John M; Biswas, W “Can the Hemp Industry Improve the Sustainability Performance of the Australian Construction Sector?” Buildings 2023, 13, 1504. <https://doi.org/10.3390/buildings13061504>).*

## The constraints and confounders to expanding the industrial hemp industry in Victoria

- Competition from other States and internationally from jurisdictions that have elected to support the hemp industry a lot more than Victoria has done to date.
- The Industrial Hemp Task Force was established in Victoria in 2019. Its terms of reference included to:
  - “examine how the Victorian Government can support industry development and growth across Victoria; and examine the regulatory and licencing framework for hemp cultivation and hemp products”. An Interim Report was issued in November 2020 but unfortunately it was only a review of the status Australia-wide and globally. It did recommend “regulatory amendments that will make it easier for Victorian growers to grow hemp.”

There were no specifics offered except to harmonise with other States regarding THC levels. Presumably, how the Government can support hemp industry development and growth across Victoria would have been included in the Task Force’s final report however the Task Force seems to have been disbanded.

- The United Nations Conference on Trade and Development mentioned above also details constraints and possible actions.
- A succession of four Agriculture Ministers has had involvement with the Task Force. It would be helpful if membership of the Task Force could have remained consistent and with a finite time within which to make its recommendations.
- The Agriculture Department has some very well-qualified officers who could be spending more productive time researching and supporting the industry rather than being enforcement officers for a crop that is not a drug.
- The licensing structure is not aligned (harmonised) with other States, despite the recent changes and there is cumbersome and unnecessary administration, given that hemp is a non-drug crop.

- There is a lack of support in communicating the uses and benefits of hemp to consumers.
- Note that some of the research carried out for this submission is old, but the facts remain today: the industry is confounded by government-imposed constraints.

## The environmental benefits and costs of an expanded industrial hemp sector

We can see no environmental **cost** to expanding the hemp industry in Victoria.

Environmental **benefits** of an expanded hemp sector include:

- Replacement for the native timber industry
- Extensive use in social housing (minimising the need for power due to insulation properties of hemp)
- Carbon sequestration
- Fewer pesticides and herbicides than many other crops
- Less water use than many other crops
- Using it as a rotational crop for farmers, increasing organic matter in the soil and assisting water retention, promoting higher yields in subsequent crops grown on the same paddock.

From “The Environmental Benefits of Using Industrial Hemp” by Andy Kerr, Oregon US Conservationist:

“The term “carbohydrate economy” was coined by David Morris of the Institute for Local Self Reliance, and North American Industrial Hemp Council founding board member.”

“Anything we make from a hydrocarbon can be made from a carbohydrate. The many wonderful products that come from hydrocarbons come with a large price: pollution that massive and difficult to deal with. Every one of the products and benefits we receive from hydrocarbons (ancient and non-renewable plant and animal material) can also be had from carbohydrates (new and renewable plant material). From a pollution standpoint, hydrocarbons are inherently dirty, carbohydrates are inherently clean.”

Hemp can be integral to a carbohydrate economy.

“Industrial hemp has great potential to displace much of the wood currently being used for fiber in this nation. In the Upper Midwest and South, it appears that hemp fiber can be grown less expensively than wood fiber for use in paper.”

“One of the largest paper companies has told the National American Indian Housing Council (NAIHC) that if hemp can be grown in Wisconsin, they will be using it for 45% of their feedstock at their mill on the Fox River within five years. Similarly, another huge paper company intendsto move 90% of their world feedstock to non-forest sources within 10 years and see hemp as a major component of that. Being international, if the can’t grow hemp in the US, they will grow it where they can.”

Surely it is better to support Victorian farmers to grow and process.

The Rodale Institute was established in the U.S. in 1947 as a non-profit organisation fostering regenerative agriculture practices. They state:

“As a cover crop, hemp enhances soil health by shading out weeds – reducing the need for synthetic herbicides – and adding diversity to crop rotations, improving soil health.”

They conducted a four year trial with the following objectives, to:

“1) evaluate weed suppressing abilities of industrial hemp (*Cannabis sativa*) in an organic grain crop rotation, 2) reduce tillage in an organic cover-crop based rotational no-till system, 3) evaluate soil health effects of including hemp within an organic grain cropping rotation and 4) evaluate organic nutrient management practices that improve industrial hemp yield and quality. This information is expected to aid farmer decision making when incorporating hemp into an existing farming plan.”

The Victorian Government could sponsor similar trials applicable to the range of climatic conditions and soil types throughout Victoria.

Some results of the Rodale trial found that

“Hemp mines and accumulates heavy metals in its tissues, making it a viable bioremediation crop”; and

“A Nutrient Management Trial was initiated in Year 3, focused on researching fertility requirements for industrial hemp. This was prompted by observations in Year 2. In Year 3, soybean and wheat yields were increased following hemp and sorghum Sudan grass, while weed pressure was reduced. Nitrogen availability appears to allow hemp to overcome weed competition at wider row spacing, while weeds appear to outcompete hemp in wider row spacing when nitrogen is limited. Higher availability of nitrogen increases hemp grain yield at wider row spacing.”

Hemp can potentially relieve the reliance on fossil fuels, especially from foreign sources; with its insulation and thermal properties in buildings it can bring efficiencies to energy use for heating and cooling; and it can contribute to the conservation of native timber by providing alternatives.

An extract from nearly 30 years ago:

“Chemists are learning to crack the hemp oil molecule, as they did the earth oil molecule. Anything humans now make from an unsustainable hydrocarbon could be made from a sustainable carbohydrate. The main problem is that we’ve bred generations of petrochemists instead of carbochemists. We can probably even made the glue to bind together hep fibers for building products from compounds in the hemp plant itself, rather than from toxic formaldehyde-based petrochemicals.” (*Kerr, Andy 1994. Hemp to Save Forests, Wild Earth Vol. 4 No. 2 Summer 54-55*)

From the Buildings 2023 Journal once again:

“Progressively, the environmental impacts associated with construction materials are gaining attention as their contribution to the whole-life cycle burdens of the global construction sector is increasing, and Australia is no exception. As such there is growing interest in the substitution of conventional construction materials with sustainable alternatives, such a bio-based materials. Among a myriad of plants with the potential to from construction materials, industrial hemp presents a promising solution because of its ability to sequester CO<sub>2</sub> through plant development, its fast growth, the reduced level of agricultural input requirements and its good technical features...The reviewed literature showed that hemp-based construction materials, including hemp concretes and insulation mats, exhibit good thermal and acoustic insulation performance compared to conventional mineral-based alternatives....the use of hemp-based materials can help to alleviate the environmental impacts of the Australian construction sector and assist in achieving climate targets.”

## How industrial hemp can be best utilised to assist Victoria in meeting emissions reduction targets;

There is currently much interest across Australia in hemp building products. With the State Government currently investigating ways to provide social housing and also encourage reduction in emissions, hemp can provide at least part of the solution. Hempcrete, a mixture of hemp hurd (the inner, pithy core of the hemp stalk) and lime-based binder, when incorporated into buildings, captures carbon. Hempcrete

provides thermal and noise insulation; it is fire resistant and vermin proof. It is installed on-site in a similar fashion to rammed earth but weighs much less. It can also be formed into tilt slabs or bricks/blocks off-site. Construction with hemp is much faster than traditional housing. There is also privately funded R&D under way in Melbourne to develop structural beams from hemp.

The World Green Building Council (WorldGBC) released a report in 2019 stating:

“Buildings are currently responsible for 39% of global energy related carbon emissions: 28% from operational emissions, from energy needed to heat, cool and power them, and the remaining 11% from materials and construction ... By 2030, all new buildings, infrastructure and renovations will have at least 40% less embodied carbon with significant upfront carbon reduction, and all new buildings are net zero operational carbon. By 2050, new buildings, infrastructure and renovations will have net zero embodied carbon, and all buildings, including existing buildings must be net zero operational carbon.”

(<https://worldgbc.org/article/sustainable-and-affordable-housing/>)

With these statistics, it is plain that hemp can be of significant assistance in reducing greenhouse gas emissions and should be utilised widely in social housing.

Again, to quote the recent paper in the “Buildings” Journal:

“Increasing population, economic growth, industrialisation and urbanisation have led to the unprecedented expansion of the construction sector. Building improve human wellbeing by providing infrastructure for economic and social development. Infrastructure activity, however, has significant detrimental effects on critical processes that regulate the Earth system and support human progress. (Rivas-Aybar, D.; John M; Biswas, W “Can the Hemp Industry Improve the Sustainability Performance of the Australian Construction Sector?” *Buildings* 2023, 13, 1504. <https://doi.org/10.3390/buildings13061504>).

## How the Victorian Government could support industry development and growth across Victoria

This Parliamentary Inquiry is charged, inter alia, with assessing “whether the regulatory and licencing framework for hemp cultivation and hemp products may be streamlined to benefit the expansion of the industrial hemp industry, including but not limited to the introduction of a standalone Industrial Hemp Act”.

The State Government could:

- Divert attention from native timber forestry to hemp;
- Undertake variety trials across the State encompassing all the varied soil and climatic conditions;
- Maintain a list of approved cultivars similar to the way Canada does, thus reducing compliance challenges and red tape for a non-drug. Some work is being carried out under the AHC nationally but input from Victoria that is applicable to our particular growing conditions would be helpful.
- Educate consumers and farmers – tackling both ends of the supply chain to create a vibrant, buoyant market.
- Utilise hemp in social housing.

The Victorian Government should invest in the hemp industry to at least the same degree at it has, and in a similar manner, as for medicinal cannabis. The compilation of an Industry Development Plan would be one step.

A total review of all the relevant legislation is required. A standalone Act could be very simple. There is already legislation covering narcotics, medicinal cannabis, prohibited substances, health and safety and food. Hemp producers must comply with all relevant legislation. Adding another Act may not even be



needed. Red tape needs to be minimised and Department officers need to be redeployed to more productive pursuits than enforcement.

The Victorian Government could also be assisting and contributing to the formulation of relevant Australian Standards for the hemp industry, particularly in building.

## Key elements for the potential development of a Hemp Industry Plan for Victoria

The “Key Actions for Government” set out in the medicinal cannabis Industry Development Plan (funded by the Victorian State Government) can easily be adapted to suit the hemp industry.

Suggestions are:

1. Promote collaboration and networking between key stakeholders;
2. Streamline regulatory requirements;
3. Construct a list of approved cultivars;
4. Licence Victorian Government intellectual property;
5. Use existing supply chains (e.g. timber) to develop export markets;
6. Establish an online one-stop-shop for industry, growers, processors and end users;
7. Facilitate work on seed breeding for new varieties in conjunction with universities;
8. Facilitate labour requirements

The medicinal cannabis industry had an Australian market value as at 2022 of \$245 million. With the vast array of products that can be produced from hemp, this figure could be matched or even exceeded, particularly if product-specific varieties are developed.

As with the medicinal cannabis Industry Development Plan, three key areas should be the focus:

- Streamlining state and Commonwealth regulation - harmonisation;
- Increasing professional and public knowledge – the wide variety of product possibilities;
- Providing industry support and integration – promoting networking and collaboration between key stakeholders.

## Priorities

We have provided a number of justifiable alternatives for government to support the hemp industry, but here are two that would be a start:

1. A large proportion of the \$7.5 million already budgeted to assist timber industry employees should be directed to retraining the 560 affected workers then redeploy them in the hemp industry. As part of the timber industry support package, funding to assess the viability and potential to convert existing timber and paper mills to hemp processing is a solution to many challenges.
2. Allocate funds from any (or all) of the Homes Victoria programs for social housing. Use of hemp in housing would reduce power bills, sequester carbon, provide a healthy living environment and hemp housing can potentially be built faster than brick veneer houses.
3. In parallel with the above, ease restrictions in the legislation to grow hemp.

## Any other relevant matters

RHV's members all accept our Values: Integrity; Respect; Collaboration; Advocacy; and Sustainability. We stand ready to work with the State Government to help grow this important industry. Our President sits on the seven member Australian Hemp Council (the AHC). In conjunction with Agrifutures Australia and the CSIRO, a Best Management Practice Manual for hemp has been produced, available for download from the AHC web site. The AHC also hosted the first national Hemp Fibre Forum in Geelong earlier this year and three successful biennial national hemp conferences have been held. The industry has evolved way beyond the early days of licensing 25 years ago and it is a lot more cohesive. Comprehensive publications, backed by solid data, will go a long way towards alleviating some of the spurious information that has previously circulated. The vast expertise of officers in the Agriculture Department and the Environment departments, to name a few, could assist with this.

Much of the hard work has been done by others – Agrifutures, CSIRO, AHC and various universities and individuals. It is now time for the Victorian Government to drive the industry in Victoria. Australia has a wonderful international reputation for quality. Victoria can take the lead in the hemp space.

We stand ready to work with the State Government in whatever way we can to build the hemp industry. We thank you for this opportunity.

Submitted by Lyn Stephenson on behalf of  
Regenerative Hemp Victoria, Inc.



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