



**Isle of Man
Government**

Reiltys Ellan Vannin



Industrial Hemp Consultation Findings

DEPARTMENT OF HEALTH AND SOCIAL CARE

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Project Lead:	Dawn Henley/Substance Misuse Steering Group
Project Sponsor:	Dr Henrietta Ewart
Project Manager:	Dawn Henley/Substance Misuse Steering Group

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Introduction

The Department of Health and Social Care (DHSC) consulted the public on a framework for licensing hemp for industrial use on the Isle of Man. Industrial hemp is grown for commercial use as a fibre or foodstuff. Hemp is a variety of cannabis sativa and is one of a number of plant species that can be used for fibre production. Hemp varieties contain very low levels of the chemical delta-9-tetrahydrocannabinol (THC) and, therefore, do not have the psychoactive properties of cannabis used for recreational use.

Under the Misuse of Drugs Act 1976, it is illegal to cultivate any plant of the genus cannabis. Therefore, growing hemp for industrial purposes at the present time is also illegal under the Act.

The Misuse of Drugs Act 1976 makes provision for the DHSC to make regulations that would enable licenses to be granted to grow cannabis species. However, the DHSC has never developed such regulations or received any requests to grant a license to grow. Creating a regulatory framework for industrial hemp could open up economic opportunities for its production on the Isle of Man. Therefore, through the consultation process the DHSC sought the views of the public on the acceptability of industrial hemp as a commercial crop, and on any particular issues relating to it that may be of concern.



1. Consultation exercise

The consultation was open to the public for a period of six weeks from 6 February 2019 to 20 March 2019.

The consultation was publicised by way of a news release and press launch where all local media organisations were invited to attend. This resulted in an excellent response including radio interviews, audio and videos on the media's websites along with posts on social media.

The consultation documents were made available on line on the Isle of Man Government Consultation Hub, links on social media, along with paper copies available in public places such as the Libraries and Local Authority offices throughout the Island.

The paperwork for the consultation included an evidence based paper, a questionnaire with an introductory section and three specific questions on a regulatory framework for industrial hemp production on the Isle of Man. Respondents also had the opportunity to raise any issues relating to a framework for hemp production that may be of concern.

1.1 Number of responses received

As we made it clear we were seeking views of local residents we have only analysed Isle of Man responses.

Responses received over the course of the consultation period was as follows:



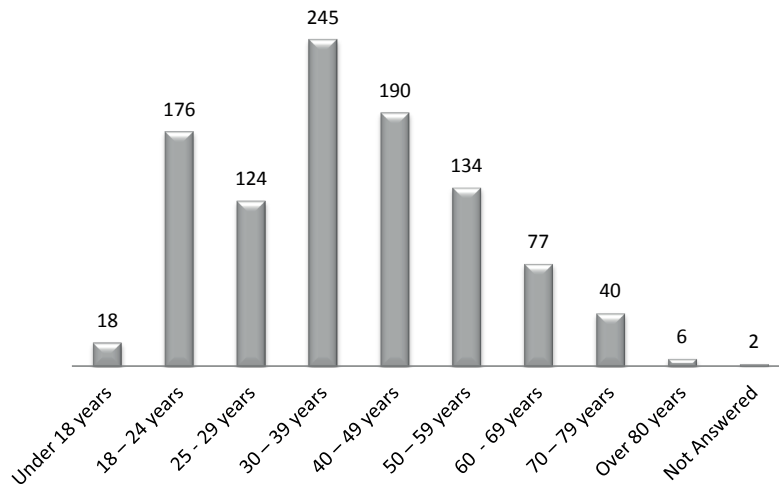
- A check was carried out to find evidence of respondents completing the survey multiple times and submissions from non-Isle of Man postcodes.
- A total of **15 non-Isle of Man responses** were received and removed from analysis.
- A total of **885 respondents** gave permission for their responses to be published on the 'Consultation Hub' and **127 did not want their responses** published.

2. Consultation results

2.1 Respondents' demographics

The following chart shows the number of responses received across all age groups.

Figure 1: Age demographics of respondents

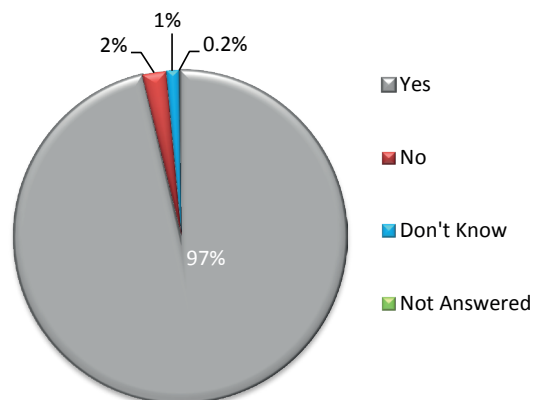


Source: Isle of Man Government Consultation, Industrial Hemp - Feb 2019

2.2 Do you support the introduction of a regulatory framework within which industrial hemp production could be permitted on the Isle of Man?

The majority of respondents (97%) support the introduction of a regulatory framework within which industrial hemp production could be permitted on the Isle of Man.

Figure 2: Percentage of respondents who support a regulatory framework

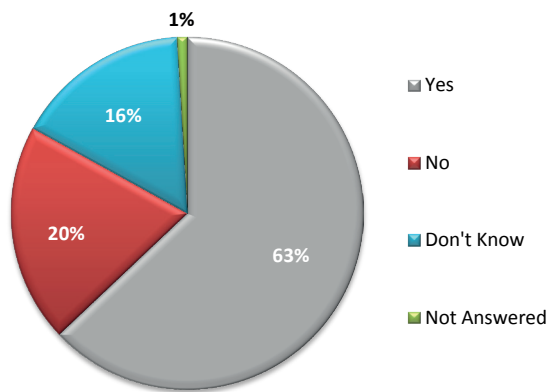


Source: Isle of Man Government Consultation, Industrial Hemp - Feb 2019

2.3 Would you support a similar regulatory framework to that currently in place in the UK?

Respondents were asked if they would support a similar regulatory framework to that currently in place in the UK. Just under two thirds of respondents (63%) supported the current framework in place in the UK. Twenty percent of respondents did not support the current UK regulatory framework, 16% were unsure and 1% did not respond to the question.

Figure 3: Percentage of respondents who support a regulatory framework similar to UK

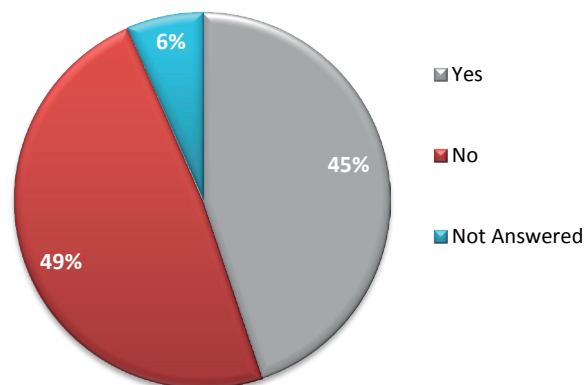


Source: Isle of Man Government Consultation, Industrial Hemp - Feb 2019

2.4 If the Isle of Man opts to follow the UK framework would you wish to see any changes to that framework prior to application in the Isle of Man?

Just under half of the respondents (49%) do not wish to see any changes to the UK framework prior to application in the Isle of Man, 45% favoured changes to the framework before application and 6% did not respond to the question.

Figure 4: Percentage of respondents who wish to see changes to framework prior to application



Source: Isle of Man Government Consultation, Industrial Hemp - Feb 2019

3. Qualitative responses

Respondents were given the option to further explain their responses to the three specific questions on a regulatory framework for industrial hemp production on the Isle of Man.

Figure 5: Word Cloud showing examples of key themes identified in the feedback



Source: Isle of Man Government Consultation, Industrial Hemp - Feb 2019

The comments have been categorised into a number of key themes identified from the qualitative responses from all three questions and are as follows:

3.1. In support of an industrial hemp framework

Themes identified by the qualitative analysis – **In support** of a framework for industrial hemp

- Economic benefits
- Environmental benefits
- Multiple uses
- Farming / Agriculture
- Type of regulation

3.2 Does not support introduction of an industrial hemp framework

Themes identified by the qualitative analysis – **not in support** of a framework for industrial hemp.

- Economic impact
- Security and crime
- Cultivation
- Lack of information and knowledge

3.3 Out of scope of the consultation

The following themes identified are out of scope of this consultation because they focus on the medicinal use, and the legalisation and decriminalisation of cannabis for personal use.

- Medicinal use
- Legalisation/decriminalisation

Detailed responses to all of the information within Section 3 can be viewed in a separate detailed 'thematic analysis document' which accompanies this report.

4. Qualitative comments

Many comments were received from those responding to the survey. The comments have been grouped into the key themes identified in the analysis of the qualitative information.

Figure 6: Word Cloud showing examples of key themes identified in the feedback



Source: Isle of Man Government Consultation, Industrial Hemp - Feb 2019

Respondents who gave their permission for their views to be published can be found on the 'Consultation Hub'. <https://consult.gov.im/> below is an example of some of the comments received using the identified key themes.

4.1 Economic

- *“The government is actively pursuing economic growth. Hemp production provides a possible new stream of economic activity which will benefit GDP. Provided the correct regulatory framework is introduced, there is no reason why we would not be able to utilise the demand for hemp to increase GDP.”*
- *“The world seems to be moving to be more open to the prospect of the use of hemp, to be able to properly grow the product would be a great commercial boon to the Island and put us at the forefront on a growing progressive industry.”*
- *“I support industrial hemp production because it will help to improve the economy by creating jobs and export opportunities.”*
- *“More crops for local farmers and businesses alike. I can't put into words how beneficial this move would be for the overall economy on the Island. The law needs to change; we need to keep up with our neighbouring countries.”*
- *“To have any success of running an industrial hemp farm requires acres of land to produce, with huge costs of security and machinery.”*

- *“While I fully understand the potential usages of industrial hemp, before any type of permission or regulation comes in to place a consultation on who would be interested must first be held (supply and demand).”*
- *“I have seen no evidence that this offers a fabulous financial opportunity for the Island. If there is to be change, I do not understand the point of having rules and regulations regarding growing that are not checked and policed.”*
- *“How great an economic opportunity can this be if 30 countries are already doing this without constraints of restricted land area and the need to export and import across the water with the associated expense?”*

4.2 Environmental

- *“I think it would make the Island a more earth friendly place, it would get rid of a lot of the plastic waste and potentially conjoin in an ‘eco’ friendly environment.”*
- *“From an environmental perspective we now have a global responsibility in providing sustainable farming practices. Hemp is known as one of the best multi-function crops available to farm in a temperate climate. With the looming presence of the environmental catastrophe only getting larger the demand for low-impact fuels, building materials and foods will only increase. Hemp can provide this.”*
- *“We must have an environmental impact assessment of the effects of introducing a mass produced alien plant species and possible consequences of the same. We must also work out what land is being proposed and where it is likely to be.”*
- *“EU approved variety of seeds – will the impact of these be tested on our biosphere.”*

4.3 Farming/Agriculture

- *“Make sure the Manx farmers are given priority to grow the product.”*
- *“Make sure that the licenses are given to Manx growers and absolutely not to external entities.”*
- *“I would recommend that growing is restricted to Manx registered small companies and farms which could form cooperatives for sale purposes. I would be disappointed to see large companies come over and take profits off the Island and away from small Manx land holders.”*
- *“Allow all farmers on the Island the ability to grow their own hemp.”*

4.4 Regulation

- *“I would like to see that regulation comes with some clear thinking and recommendations for how the Island can process hemp plants into materials on-Island, so we can have a well thought out strategy from growth, to manufacturing and sales of hemp based products. These can easily and clearly link into the forthcoming government environment strategy and provide a good alternative solution for the Island to the issues of plastics and cheap cotton etc.”*
- *“As our own government is different to the UK, I think we should not only take our own approach to regulations, but move forward to see that this is done sooner rather than later.”*
- *“We are an independent Island with our own laws and I believe a framework should be designed in the way that the Island would benefit most.”*
- *“It is important that any regulatory framework is familiar to potential investors and export markets. The UK is the most likely source for both investment and future markets, thus aligning with their framework makes sense from a trade perspective.”*
- *“The Isle of Man should follow the UK framework, but should be able to change certain aspects as the development of the hemp production industry progresses. Problems that may arise will need to be addressed without having to follow UK guidelines.”*
- *“In the light of the very minimal involvement DHSC would have in the process of industrial hemp, I think it would make sense for the oversight and regulation to move to DHA. This would allow DfE and DEFA to develop the industry without the conflict of being a regulator. The UK model allows for the appropriate regulations for industrial hemp farms without over-the-top government interference. I would see no reason for the level of monitoring crops be any greater than with other farming activities. I would like to see five-year licenses considered as we must attract businesses to move to the Island to establish themselves and the additional surety would make us more appealing”.*
- *“We have an opportunity to put in place a framework that works for us, rather than simply taking a copy of what is being implemented elsewhere.”*
- *“We need a Manx framework to keep within the Manx Biosphere”.*
- *“I would prefer to see a set of guidelines that control the production in a similar way we do alcohol (another controlled substance) for instance.”*
- *“The Isle of Man would be potentially starting a bespoke system based on very little, if any, experience. The involvement of DEFA and DHA is regarded as an important component of any cultivation for implementation monitoring and*

oversight. Overall, we believe we could not automatically develop a similar framework as the UK due to the differing government structures, responsibilities and current expertise available. A suitable site for cultivation would also need strict controls and protection. So routine visits and compliance inspections, as well as licenses, would be expected.”

4.5 Security/crime

- *“Extra safety rules to control the policing of systems to prohibit organised crime obtaining any level of production stranglehold.”*
- *“This would encourage undesirable people to the Island leading to maybe more crime, even if only petty crime. I feel it would totally destroy the Island’s image. I don’t think it should be sold here, so why grow it.”*
- *“I think it would be misused here. Police are stretched enough to have to deal with this.”*
- *“Hemp production would be like a magnet and would attract a large criminal element to the Island. The Isle of Man police force would have to triple in size to deal with the repercussions.”*

4.6 Cultivation

- *“Limit the amount produced to ensure economic diversity.”*
- *“Regular testing of crops to ensure THC content is within acceptable guidelines should be done.”*
- *“Remove the requirement to only grow ‘EU’ approved varieties.”*
- *“The production of hemp should not necessarily be seen as something that ‘just anyone’ can have a go at, in my opinion.”*

4.7 Lack of information and knowledge

- *“Would welcome further specific information about this proposal and on the mechanisms for introduction, particularly in relation to funding (presume private investment and not public funding), site location and the impact analysis on implementation with regard to the actual benefits to the Isle of Man. There needs to be information about the potential benefits and pitfalls for the Island including financial loss and gain as well as benefits and problems experienced in other areas where hemp production is already in place before I could make a balanced decision.”*
- *“A clear difference in the law between ‘what is hemp’ and ‘what is medicinal cannabis’ should be made. Most people are not aware of the differences.”*

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- *“It would be better if rather than have a public consultation process, more scientific evidence or a Tynwald debate was held. It seems we are asking people who don't really know what they are talking about to pressurise the politicians into making uninformed decisions.”*
 - *“The consultation document gives none of the key information financial or otherwise, to enable me to gauge the financial benefits to the Island of changing the law. For example:*
 - *Level of interest to grow the crop*
 - *Financial return per acre vs other crops*
 - *Capital investment if required by growers (equipment)*
 - *Level of financial support by Government*
 - *Number of jobs likely to be created.”*
 - *“What processing of crop required and where will this happen. If harvested and sent across – bulky, heavy and therefore not cheap or environmentally green transport.”*

6. Summary

The focus of this consultation was on a framework for licensing hemp for industrial use on the Isle of Man. In general, respondents expressed support for the introduction of a regulatory framework within which industrial hemp production could be permitted on the Isle of Man, whilst a minority disagreed. Likewise, the majority of respondents favoured a similar framework to that currently in place in the UK. However, opinions were split with 49% of respondents not wanting to see any changes to the UK framework and 45% wanting to see changes prior to application.

All respondents had the opportunity to provide further information and many shared their views on specific topics, for example, regulations, economy, and the environment. The qualitative comments gave more detail on the respondents' feedback in relation to the licensing of hemp, for example, support for the UK licensing process, development of a Manx license and meeting the needs of hemp growing on the Island.

Furthermore, a number of comments received from respondents were out of scope of this consultation and were in relation to:

- Medicinal use, which was part of a separate consultation running at the same time as the industrial hemp consultation.
- Decriminalisation and legalisation of cannabis for personal use.

Comments from respondents who gave their permission for them to be published can be seen on the Isle of Man Government 'Consultation Hub.'

<https://consult.gov.im/>

Acronyms and Abbreviations

DfE	Department for Enterprise
DEFA	Department of Environment, Food and Agriculture
DHA	Department of Home Affairs
DHSC	Department of Health and Social Care
Eco	Ecological
EU	European Union
THC	Delta-9-tetrahydrocannabinol
UK	United Kingdom



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Reiltys Ellan Vannin



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DEPARTMENT OF HEALTH AND SOCIAL CARE
Public Health Directorate, Cronk Coar, Noble's Hospital
Strang, Douglas, Isle of Man, IM4 4RJ.
www.gov.im/publichealth