



Council On Governmental Relations

An Association of Research Institutions

The Honorable Uttam Dhillon
Acting Administrator
United States Drug Enforcement Administration
8701 Morissette Drive
Springfield, CA 22152

September 19, 2018

RE: Docket No. DEA-488P – Proposed Aggregate Production Quotas for Schedule I and II Controlled Substances and Assessment of Annual Needs for the List 1 Chemicals Ephedrine, Pseudoephedrine, and Phenylpropanolamine for 2019

Dear Acting Administrator Dhillon:

The Council on Governmental Relations (COGR) is a non-profit association of 187 research universities and affiliated academic medical centers and independent research institutes. COGR concerns itself with the impact of Federal regulations, policies, and practices on the performance of research conducted at its member institutions.

We appreciate the opportunity to comment on the proposed 2019 production quotas for Schedule I and II controlled substances published in the Federal Register on August 20, 2018 and fully endorse the significant increase for marijuana and tetrahydrocannabinols from previous 2018 quotas. We hope that this ultimately means that the DEA will act in a timely manner on the applications it has received in response to a 2016 Federal Register notice (“Applications To Become Registered Under the Controlled Substances Act To Manufacture Marijuana To Supply Researchers in the United States” (Docket No. 81 FR 53846)) from entities seeking DEA approval to manufacture (grow) marijuana to supply researchers. Both the proposed increase in production quotas and approval of additional manufacturers/suppliers of research marijuana will enhance the ability of Universities to conduct scientific research, which is of critical public health and public policy importance in light of increasing use of marijuana, especially as States continue to authorize medical and non-medical adult use of marijuana.

Increased quotas along with an expansion of manufacturing facilities will lead to increased knowledge about the potential therapeutic benefits of marijuana and its components, while also giving scientists the ability to examine other areas such as polypharmacy, the impacts of mixing illicit unapproved drugs with marijuana, and potential negative impacts (including impairment that can affect driving) to name a few. We believe that through ongoing cooperative engagements with both federal and state agencies, improvements to public health can be realized.

Should you have additional questions, please do not hesitate to contact Jackie Bendall at (202) 289-6655.

Sincerely,

A handwritten signature in black ink, appearing to read "Anthony P. DeCrappeo".

Anthony P. DeCrappeo
President