

M4MM Long-form Generic Letter for Public Comment: Advocacy for Rescheduling Marijuana to Schedule V

[Your Name] [Your Address] [City, State, ZIP Code] [Email Address] [Date]

Drug Enforcement Administration Attn: DEA Federal Register Representative/DPW 8701 Morrissette Drive Springfield, Virginia 22152

RE: Docket No. DEA-2024-0059-0001

Dear Sir/Madam,

I am writing to express my support for the rescheduling of marijuana to Schedule V under the Controlled Substances Act (CSA), as proposed in the DEA Rescheduling Draft Docket No. DEA-1362; A.G. Order No. 5931-2024. This letter outlines the key reasons for advocating this change based on the scientific, medical, and regulatory rationale provided in the draft.

Lower Potential for Abuse

Marijuana has been found to have a lower potential for abuse compared to substances in Schedule III. Its abuse potential is significantly less than that of drugs like heroin and cocaine, making Schedule V a more appropriate classification. Epidemiological data support this by showing fewer severe health outcomes related to marijuana use compared to higher-scheduled substances.

Currently Accepted Medical Use

Marijuana is recognized for its medical use in numerous states across the U.S., treating conditions such as chronic pain and nausea. The widespread acceptance and substantial clinical evidence of marijuana's therapeutic benefits justify its placement in Schedule V, which includes drugs with accepted medical uses and lower abuse potential.

Limited Dependence Liability

Marijuana's potential for physical and psychological dependence is relatively low. The mild withdrawal symptoms observed further support this lower scheduling. Compared to Schedule IV substances, marijuana's dependence liability is less, making Schedule V a suitable classification.

Public Health and Safety

The safety profile of marijuana when used under medical supervision is well-established, with fewer severe adverse effects compared to higher-scheduled substances. Rescheduling marijuana to Schedule V would maintain necessary regulatory controls while allowing broader access for medical use, ensuring public health and safety are protected.

Economic and Social Impacts



Rescheduling marijuana to Schedule V can significantly benefit minority communities by creating more opportunities in the legal cannabis industry, fostering economic growth, and reducing disparities. Additionally, this rescheduling would facilitate more extensive research into marijuana's therapeutic potentials, leading to new medical products and treatments.

Compliance with International Obligations

Rescheduling marijuana to Schedule V ensures that the United States remains compliant with international treaty obligations. This balance allows for domestic regulatory flexibility without compromising international commitments.

Eight-Step Process for Rescheduling (21 U.S.C. 811)

To reschedule marijuana to Schedule V, the following eight factors must be considered:

- 1. Potential for Abuse: Marijuana has a low potential for abuse relative to substances in Schedule IV.
- 2. Scientific Evidence of Pharmacological Effect: Evidence supports marijuana's efficacy in treating various medical conditions.
- 3. Current Scientific Knowledge: There is extensive scientific knowledge about marijuana's effects and medical uses.
- 4. History and Pattern of Abuse: The abuse pattern of marijuana is less severe than that of higher-scheduled drugs.
- 5. Scope and Significance of Abuse: The overall public health impact of marijuana abuse is relatively low.
- 6. Risk to Public Health: Marijuana poses a lower risk to public health compared to higher-scheduled substances.
- 7. Dependence Liability: Marijuana's potential for dependence is low, supporting a Schedule V classification.
- 8. Immediate Precursor: Marijuana is not an immediate precursor of any substance already controlled under the CSA.

Conclusion

Rescheduling marijuana to Schedule V is supported by its lower potential for abuse, recognized medical use, limited dependence liability, and manageable public health risks. This change would facilitate broader access for medical purposes while maintaining appropriate regulatory controls, benefiting public health and supporting economic growth, particularly in minority communities.

I urge the DEA to consider these points and proceed with rescheduling marijuana to Schedule V to reflect its therapeutic benefits and lower abuse potential.

Thank you for considering my comments.

Sincerely,

[Your Name]

Members and advocates can use this letter as a template to submit their comments to the DEA Rules Making public comment site at <u>regulations.gov</u>.



M4MM Short-form Concise Generic Letter for Public Comment: Advocacy for Rescheduling Marijuana to Schedule V

[Your Name] [Your Address] [City, State, ZIP Code] [Email Address] [Date]

Drug Enforcement Administration Attn: DEA Federal Register Representative/DPW 8701 Morrissette Drive Springfield, Virginia 22152

RE: Docket No. DEA-2024-0059-0001

Dear Sir/Madam,

I am writing to support the rescheduling of marijuana to Schedule V under the Controlled Substances Act. Below are the key reasons for this recommendation:

Lower Potential for Abuse

Marijuana has a lower potential for abuse compared to drugs in Schedule III. It is less harmful and has fewer severe health outcomes than substances like heroin and cocaine.

Medical Use

Marijuana is widely accepted for medical use in many states, treating conditions such as chronic pain and nausea. It meets the criteria for Schedule V, which includes drugs with accepted medical uses and low abuse potential.

Dependence Liability

Marijuana's risk of causing dependence is low. The mild withdrawal symptoms further support its placement in Schedule V.

Public Health and Safety

Marijuana is safe when used under medical supervision, with fewer severe side effects compared to higher-scheduled substances. Rescheduling to Schedule V will maintain necessary controls while allowing broader medical access.

Economic and Social Benefits

Rescheduling to Schedule V can benefit minority communities by creating more legal business opportunities and fostering economic growth. It will also support more research into marijuana's medical benefits.

Compliance with International Obligations

Rescheduling to Schedule V ensures compliance with international treaty obligations, allowing for necessary regulatory flexibility.



Conclusion

Rescheduling marijuana to Schedule V is justified by its lower abuse potential, recognized medical use, low dependence liability, and manageable public health risks. This change will facilitate broader medical access and support economic growth, especially in minority communities.

I urge the DEA to proceed with rescheduling marijuana to Schedule V.

Thank you for considering my comments.

Sincerely,

[Your Name]

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