



OFFICE OF THE VICE PRESIDENT - RESEARCH AND GRADUATE STUDIES

OFFICE OF THE PRESIDENT
1111 Franklin Street, 11th Floor
Oakland, California 94607-5200

September 17, 2018

Uttam Dhillon
Acting Administrator
United States Drug Enforcement Administration
8701 Morissette Drive
Springfield, Virginia 22152

RE: Docket No. DEA-488P: Proposed Aggregate Production Quotas for Schedule I and II Controlled Substances and Assessment of Annual Needs for the List I Chemicals Ephedrine, Pseudoephedrine, and Phenylpropanolamine for 2019 (August 20, 2018)

Dear Acting Administrator Dhillon:

I write on behalf of the University of California (UC) system in response to the Federal Register Notice request for comment, "Proposed Aggregate Production Quotas for Schedule I and II Controlled Substances and Assessment of Annual Needs for the List I Chemicals Ephedrine, Pseudoephedrine, and Phenylpropanolamine for 2019," published on August 20, 2018. In addition to the comment below specific to this Federal Register notice, UC strongly urges the Drug Enforcement Administration (DEA) to act on the pending applications for licenses to manufacture marijuana for research purposes (Docket No. 81 FR 53846) issued August 12, 2016.

The UC system is comprised of ten research-intensive campuses, six medical schools, three affiliated U.S. Department of Energy national laboratories, and a Division of Agriculture and Natural Resources. UC has established an unparalleled reputation for research and innovation, contributing to the state and nation through discoveries and new technologies that improve health, the environment, security, and quality of life. Specific to cannabis research, UC has been at the forefront of advancing science to understand the potential risks and benefits of cannabis use, with notable research centers and initiatives located at UC Davis (UCD Cannabis Research Initiative), UC Irvine (Center for the Study of Cannabis), UC Los Angeles (UCLA Cannabis Research Initiative), UC Merced (UC Nicotine and Cannabis Policy Center), and UC San Diego (Center for Medicinal Cannabis Research).

2019 Production Quotas for "Marihuana" and Tetrahydrocannabinols

UC supports DEA's intent to increase the production quota for "marihuana" and tetrahydrocannabinols and appreciates the DEA's support for authorized investigations of the potential effects of cannabis-derived drug products.

Application for Licenses to Manufacture Marijuana for Research Purposes

On August 12, 2016, the DEA published a 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), soliciting applications for licenses under the Controlled Substances Act (CSA) to manufacture marijuana for research purposes. The DEA stated that its intent was to “increase the lawful supply of marijuana available to researchers” and to “increase the number of registered growers who will be supplying U.S. researchers.” However, as of the date of this letter, DEA has yet to approve any of the applications it has received in response to the 2016 Federal Register notice.

For nearly fifty years, only one entity has been authorized to produce marijuana for researchers located in the U.S., operating under a contract with the National Institute on Drug Abuse (NIDA). Authorizing additional marijuana manufacturers in the U.S. will assist in meeting the 2019 production quotas for “marihuana” and tetrahydrocannabinols, while also enhancing researchers’ capacity to conduct legitimate investigations into both the potential negative impacts and therapeutic benefits of cannabis use. Therefore, UC urges the DEA to finalize a timely review of applications for licenses to manufacture marijuana for research purposes.

We appreciate the opportunity to comment on this notice and commend your diligence in facing the challenging task of overseeing the manufacture of controlled substances in the U.S. in order to meet your obligations set forth in the CSA and in relevant international treaties.

Sincerely,



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