



NATIONAL NARCOTIC OFFICERS' ASSOCIATIONS' COALITION

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www.nnoac.com

May 18, 2020

The Honorable Richard Shelby
Chairman
Senate Committee on Appropriations
S-128 The Capitol
Washington, D.C. 20510

The Honorable Patrick Leahy
Ranking Member
Senate Committee on Appropriations
S-128 The Capitol
Washington, D.C. 20510

The Honorable Roy Blunt
Chairman
Senate Appropriations Subcommittee on
Labor, Health and Human Services,
Education and Related Agencies
United States Senate
Washington, D.C. 20510

The Honorable Patty Murray
Ranking Member
Senate Appropriations Subcommittee on
Labor, Health and Human Services,
Education and Related Agencies
United States Senate
Washington, D.C. 20510

The Honorable John Hoeven
Chairman
Senate Appropriations Subcommittee on
Agriculture, Rural Development,
FDA and Related Agencies
United States Senate
Washington, D.C. 20510

The Honorable Jeff Merkley
Ranking Member
Senate Appropriations Subcommittee on
Agriculture, Rural Development,
FDA and Related Agencies
United States Senate
Washington, D.C. 20510

The Honorable Nita Lowey
Chairwoman
House Committee on Appropriations
H-307 The Capitol
Washington, D.C. 20515

The Honorable Kay Granger
Ranking Member
House Committee on Appropriations
1036 Longworth House Office Building
Washington, D.C. 20515

The Honorable Sanford Bishop
Chairman
House Appropriations Subcommittee on
Agriculture, Rural Development,
FDA and Related Agencies
2362A Rayburn House Office Building
Washington, D.C. 20515

The Honorable Jeff Fortenberry
Ranking Member
House Subcommittee on
Agriculture, Rural Development
FDA and Related Agencies
1016 Longworth House Office Building
Washington, D.C. 20515

The Honorable Rosa DeLauro
Chairwoman
House Appropriations Subcommittee on
Labor, Health and Human Services
and Related Agencies
2358B Rayburn House Office Building
Washington, D.C. 20515

The Honorable Tom Cole
Ranking Member
House Appropriations Subcommittee on
Labor, Health and Human Services,
and Related Agencies
1016 Longworth House Office Building
Washington, D.C. 20515

Dear Honorable House and Senate Members,

I write to you on behalf of members of The National Narcotics Officers' Associations' Coalition (NNOAC), representing 40 state narcotic associations, several partner agencies and organizations that represent more than 55,000 law enforcement officers from across the nation. The NNOAC serves as an umbrella organization, coordinating policy efforts and legislative initiatives of these associations in our nation's capital to promote good drug policy and effective legislation to protect our citizens from the substantial harm that results from drug abuse, illegal drug trafficking and its associated violent crime. Our NNOAC members are on the front lines combating illegal drugs on the streets and protecting our communities from the public safety risks associated with these illicit activities.

We are proud to join the Consumer Brands Association CBD Coalition, which includes others in law enforcement and a diverse group of stakeholders, who are concerned about the poorly regulated, often illegal, retail sales of cannabidiol (CBD) products that have dramatically expanded in the United States. Complaints from the community that expect some regulation and clarity about CBD sales often land in the laps of law enforcement agencies and our NNOAC members, putting an additional burden on public safety resources that are already strained.

Both American consumers and law enforcement are deeply concerned about the safety, ingredients, and quality of CBD products. Regulatory oversight, including ongoing surveillance and enforcement of the CBD market by the Food and Drug Administration (FDA) is essential. But for the FDA to effectively oversee CBD products and support our members as they enforce the law, the agency needs additional resources to do its job.

To ensure that consumers and retailers can be protected, the NNOAC joins the Consumer Brands Association's request to Congress for an additional appropriation to expand FDA's Office of Regulatory Affairs, targeted to ORA's Office of Criminal Investigations, Health Fraud unit, to include field laboratories, focused on illicit CBD products. We also propose that Congress provide adequate funding for policy development and civil enforcement activities within FDA's Center for Food Safety and Applied Nutrition (CFSAN).

These appropriations are critically needed to enhance FDA's surveillance and enforcement efforts of CBD products, which are now competing with other important FDA priorities. This new emphasis on CBD surveillance and enforcement will go hand-in-hand with FDA's own efforts to develop new regulatory policies on CBD. It will make it easier for FDA to target CBD products and distributors that make false and misleading claims, and to focus on CBD products that are adulterated with pesticides or heavy metals. These surveillance and enforcement activities will help FDA develop good, effective regulations.

These appropriations will provide for additional resources within ORA and CFSAN that can focus on surveillance and enforcement of both domestic and imported CBD products, while also helping to establish appropriate policies and regulatory pathways for safe, legitimate CBD products. Increased appropriations will help FDA fulfill those responsibilities that the American public expects, and will provide some much needed assistance, expertise and guidance for state and federal law enforcement, as well.

The NNOAC also believes that more research is needed to ensure that consumers can rely upon the efficacy and the safety of CBD products that are being touted (often fictitiously and without scientific evidence) as the cure-all for a long litany of maladies and diseases. More research is also needed so that the FDA can explore and implement regulatory options that will ensure the safety of consumers. To assist in this effort, the NNOAC also supports proposed language for the Appropriations Committee report on the National Institutes of Health that would add at least \$5 million in collaborative research on the efficacy of CBD products along with other related health and safety issues.

The NNOAC encourages you to support these appropriations requests because it is critical that consumers can rely upon the safety and effectiveness of health-related products, and because law enforcement needs good regulatory policies and legal support that they can use to address the numerous questions and complaints they are receiving about the ever increasing, unregulated sales of CBD products throughout the nation.

Please contact me if the NNOAC can provide any further information or assistance in regard to this rapidly emerging issue.

Sincerely,



Bob Bushman
NNOAC President