



NATIONAL NARCOTIC OFFICERS' ASSOCIATIONS' COALITION

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Director Rahul Gupta
Office of National Drug Control Policy
Executive Office of the President
Washington, DC 20006

Director Gupta,

Please see the following recommendations for the National Drug Control Strategy that I am submitting to ONCDP on behalf of the members of the National Narcotic Officers' Associations' Coalition (NNOAC).

I appreciate the opportunity to provide these recommendations, and I invite you or your staff to contact me if you have any questions, or if you would like any further information.

Regards,

Eric Brown
President, NNOAC

NNOAC Recommendations for the National Drug Control Strategy

1. The National Drug Control Strategy needs emphasize the enforcement of drug laws. Recent and current drug policy discussions and legislative initiatives seem to be focused on normalizing and accepting drug use rather than discouraging and it. Permitting states to circumvent and supersede federal controlled substance laws has resulted in dramatic increases in drug use, abuse, and deaths nationwide. One need only look at recent death rates of drug abusers at over 107,000 to see that the current drug control strategies need to be solidified. Law enforcement has an important role in protecting our communities from drug abuse, drug trafficking and violent crime. That role should not be diminished.

2. A major component of our national drug control strategy must include efforts to stop the import of illegal drugs and synthetics from international countries through powerful, well established drug trafficking organizations and drug cartels. The influx of fentanyl powder, counterfeit pills, and heroin continue to claim thousands of American lives, and lead thousands of others into addiction. While the opiate problem has been getting most of the publicity, the methamphetamine crisis has continued to grow, and cocaine production and importation is on the rise. Poly-drug use and the traces of fentanyl appearing in many different substances is fueling many addictions and deaths as well. Legislation must be passed to permanently schedule all fentanyl analogues. Along with that, "dark web" sales are making it much more difficult to identify and interdict drug importers and traffickers. In order to begin to drive drug abuse and addiction rates lower, we must reduce illegal drug supplies. That is law enforcement's job, and our national drug control strategy needs to support programs that provide law enforcement with the staffing, resources and training they need to interdict, investigate and prosecute drug traffickers and drug trafficking organizations.

3. The federal government needs to step up the enforcement of all THC products. Vaping of marijuana products is causing serious illnesses and deaths, nationwide, and it has reached epidemic levels. Vaping is widespread and is having a negative impact on young people, as school districts throughout our country struggle to find ways to address the problem. While many medical organizations and some state health officials have acknowledged the fact that most vaping illnesses and deaths are due to THC products, the government is slow to admit that. It is time for our leaders to call for the elimination of those products and start to make it a priority to protect our youngest citizens. A successful national drug control strategy should not allow states to circumvent or supersede federal drug laws.

4. The hemp/CBD issue is also causing problems in our communities and for law enforcement. The poorly crafted 2018 Farm Bill that legalized hemp did not adequately consider the proliferation of the now popular CBD products, derivatives from hemp and marijuana, which are openly sold in violation of many existing laws and regulations. While many CBD products are marketed as "THC free" there is no current uniform regulatory process to ensure that they are, nor is there any enforcement to ensure that those products are safe - or that they are properly manufactured, packaged or labeled. Complaints about CBD products and businesses are flooding into law enforcement, putting a strain on already over-burdened agencies. Some law enforcement

agencies report complaints from parcel companies and carriers that are being inundated with packages of hemp/CBD/marijuana products that violate many federal and state laws.

5. "Safe injection sites" and needle exchange programs do not curb or diminish drug abuse. Those programs violate existing laws and they should not be funded or allowed by our government. Good drug policy and legislation will focus on lifting people out of addiction by providing treatment and education, rather than supporting their demise.

6. To ensure that coordinated, cooperative drug law enforcement efforts continue, funding for programs like Byrne/JAG and HIDTA must be increased. Programs like Byrne/JAG grants and the HIDTAs are important tools that help to encourage cooperation and multi-jurisdictional efforts between federal, state and local law enforcement agencies, and they help them to protect our communities from drug trafficking, drug abuse and violent crime. These programs are especially critical in rural areas where there are few resources available to address those issues. Increased funding for information sharing and deconfliction systems provided through the RISS Centers and HIDTAs are critical too, as they help protect our law enforcement officers as they investigate and apprehend drug traffickers and their distribution networks. To effectively address drug and violent crime issues, grant funds must be reapportioned to law enforcement initiatives and not diverted for other programs. Diversion and reallocation of law enforcement grant funds decrease law enforcement's ability to proactively investigate and prosecute drug trafficking and violent crimes.

7. The negative publicity generated by recent high-profile cases has increased the need to improve and expand training opportunities for law enforcement officers. In addition, the prevalence of synthetic opiates and the potential for exposure to other harmful substances has accelerated the urgency to provide law enforcement officers and first responders with training to enable them to safely identify, handle, remove and analyze those dangerous substances. Funding for programs like the National Guard Counterdrug Schools and the Center for Task Force Training allow for training to be delivered locally to law enforcement officers across the nation at little or no cost to their agencies. Local delivery of those training programs expands opportunities to increase officers' knowledge and abilities, which helps to improve their performance and interactions with the public. Good training is also assurance for our citizens that our nation's police officers are adequately prepared and properly equipped to provide effective services that will protect them and their communities.

8. The national drug control strategy should continue a plan to coordinate the efforts and resources of law enforcement, public health, treatment providers and private sector agencies to provide a more effective response for reducing mental health and addiction issues related to drug abuse. Drug abuse is a common denominator in many cases of mental illness and addiction, consequently having a significant, negative impact on many of our communities. We must work to reduce, not accept, drug abuse. Responding to, and dealing with, cases of mental illness is also overwhelming law enforcement, as that is often the only response in the community that is available to those who seek help when there is a mental health crisis. A strong partnership between public health and public safety is a key component to the drug crisis facing our country.

