

Dear Commission members,

I am a scholar and researcher who has studied the social and health consequences of illicit drug use for many years. I urge you NOT to generate class-based sentencing guidelines for the synthetic cannabinoids or fentanyl analogues.

Rightly or not, some people use synthetic cannabinoids as a form of replacement therapy because they are experiencing opioid withdrawal, or fear that they will experience opioid withdrawal. Others might use synthetic cannabinoids in place of marijuana, sometimes unwittingly.

As for fentanyl and its analogues, it is well-known that these have entered illicit drug supplies and can't be detected without laboratory analysis so users or sellers might not even know they are using or selling fentanyl. It is clearly not right to subject such people to the higher penalties that apply to intentional fentanyl distributors.

I fear that that new standards for sentencing will perpetuate, not reduce, the problems we experience with drug use and misuse.

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