



Tri-County Health Department Testimony to Town of Castle Rock, Colorado

Re: Ordinance 2019-011 - Amending Title 9 of the Castle Rock Municipal Code by the Addition of a New Chapter 9.24 Entitled Sale of Kratom to Minors Prohibited (Second Reading)

June 4, 2019

Tri-County Health Department (TCHD) remains concerned with the Town of Castle Rock's proposed ordinance to regulate kratom absent critical health and safety information. If the Town of Castle Rock does take action to permit sales to persons 18 years of age and older, TCHD urges the Town to take action to ensure that consumers are sufficiently informed when purchasing these products. As a home rule municipal corporation, the Town Council is empowered to adopt ordinances as are necessary and convenient to protect the health, safety and welfare of the community. TCHD strongly recommends that the proposed ordinance also include a requirement for warning labels for all kratom products authorized for sale in Castle Rock. Such labeling should state "This product is not intended for human consumption. Consuming kratom products may pose a risk, including death, to consumers and has addictive potential. Increased risk of injury or death may be posed by consuming with alcohol and other drugs."

Unlike other products evaluated and regulated by the U.S. Food and Drug Administration (FDA), kratom has not been approved for human use as a drug, food ingredient, or dietary supplement. As such, these products are not subject to any of the FDA labeling requirements that consumers rely on to make informed choices. This is especially concerning given that kratom must be imported in the U.S. labeled as not for human consumption, with wholesalers then repackaging the product for retail sale intending for people to ingest it without such labeling.

The lack of health oversight over kratom production and human use remains problematic and poses risks to people who use it. Kratom is promoted by the industry as having a wide variety of pharmacologic effects on users. Kratom is marketed as a pain reliever, anti-inflammatory, cough suppressant, mood enhancer, stress reliever, blood sugar stabilizer, metabolism booster, immune system booster, energy booster, and, because of the similar physiological effects, as a method of curing opioid addiction. The scientific evidence is either lacking or incomplete to establish the health benefits of using kratom to treat these medical conditions.

While TCHD continues to recommend a ban on sales of kratom products pending better scientific evidence on health and safety, we understand that the Town Council has the authority to regulate this product in the absence of state law. We urge the Town Council to require warning labels on kratom products sold in your jurisdiction to provide, at a minimum, a basic safety message to consumers.

For questions, concerns, or any additional information, please contact Dr. Bernadette Albanese at balbanese@tchd.org or 720-200-1534.

This information is provided on behalf of the Tri-County Health Department as a public health agency and not on behalf of the Commissioners of Adams, Arapahoe or Douglas Counties.