



THE STATE
of ALASKA
GOVERNOR MIKE DUNLEAVY

Controlled Substances Advisory Committee

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March 31, 2026

Honorable Michael Dunleavy
Office of the Governor
PO Box 110001
Juneau, Alaska 99811-0001

Re: CSAC Advisement for Scheduling Kratom as a IIA Controlled Substance

Dear Governor Dunleavy:

As you know, the Controlled Substances Advisory Committee (CSAC) is an advisory board made up of subject matter experts in the field of controlled substances. The CSAC is tasked, among other things, with advising your honor “of the need to add, delete, or reschedule controlled substances in the schedules in AS 11.71.140 – 11.71.190.” The CSAC consists of medical professionals, law enforcement personnel, and members of the public, with professional experience in the area of controlled substances. Over the past year, the CSAC has met to discuss the various and widespread issues surrounding drugs in modern Alaska with this task in mind. To that end, the CSAC has agreed the opioid-like kratom, specifically the chemical component of its refined processed form, 7-Hydroxymitragynine colloquially known as *7-OH*, the derivative compound Mitragynine pseudoinoxyl colloquially known as *Pseudo*, and the derivative compound dihydro-7-hydroxy Mitragynine colloquially known as *MGM-15*, need to be added to the Alaska controlled substance schedule.

Kratom is made from a plant from Southeast Asia and mimics opioids at a chemical level, affecting the same receptors as traditional opioids. It can be ingested as tea or as a pill, and small doses purportedly help with pain and cause euphoria. The chemical components of kratom are habit-forming, have addictive properties, and are highly susceptible to abuse. In comparative relation to Alaska’s overall controlled substance scheme, this committee advises that the refined chemical components of kratom and their derivatives would be appropriately scheduled as a IIA controlled substance.

Kratom is a national concern and has a particular impact on Alaska. Currently, 7 other states and 35 counties have made it illegal. Within the last four years, law enforcement throughout Western Alaska has seen a drastic increase in the distribution of refined kratom, all from sources external to Alaska, but has been unable to respond. By codifying these refined chemical components of kratom and their derivatives in Alaska law as schedule IIA, their distribution would be managed as a felony crime. In this way the state can begin tackling this growing problem. Law enforcement

will be able to address those who are profiting from the unregulated importation and distribution of kratom's dangerously concentrated 7-OH, Pseudo, and MGM-15 forms in Alaska.

The CSAC formally recommends that kratom, specifically the chemical component of its refined processed form: *7-Hydroxy-mitragynine*, and its chemical derivatives: *Mitragynine pseudoindoxyl* and *dihydro-7-hydroxy Mitragynine*, be classified as schedule IIA controlled substances. With acknowledgement of the difficulty of terminology when codifying chemical substances into law, the CSAC also recommends any future derivative alterations of kratom's chemical component mytragynine be considered for classification as controlled substances.

Sincerely,

Sara Rasmussen
Chair, Controlled Substances Advisory Committee
President of Board of Pharmacy Designee

cc: CSAC members (*via email*).