



Mayor Quenton Lucas

Office of the Mayor
414 E. 12th Street
Kansas City, MO 64106

Dear Mayor Lucas,

I am writing as Medical Director of Botanicals for Better Health and Wellness (BBHW) to provide scientific and public health context on the proposal to ban kratom in Kansas City. I appreciate the City's commitment to protecting residents and supporting evidence-based policy. The current proposal would unintentionally conflict with both state public health guidance, federal guidance, and established scientific evidence. Further, this action poses a significant public health risk and does not address the true danger.

Across Missouri, state agencies have consistently recommended a targeted focus on the synthetic alkaloid 7-hydroxymitragynine. This aligns with federal considerations and the broader scientific community. Natural kratom leaf and full-spectrum kratom extracts do not contain meaningful levels of 7-hydroxymitragynine; however, efforts by manufacturers in the 7-hydroxymitragynine industry have conflated kratom with 7-hydroxymitragynine by misbranding their products as "kratom". The public health risks documented in recent years are overwhelmingly attributable to products adulterated with 7-hydroxymitragynine, mitragynine pseudoindoxyl, MGM-15, and other synthetic derivatives. These substances pose a legitimate danger and require decisive enforcement. Natural kratom does not fall into this category. Kratom is a botanical and should be regulated as such, unlike 7-hydroxymitragynine, which has been identified as a synthetic opioid drug that is misbranded as kratom.

Kansas City's proposed approach goes further than the position taken by Missouri state leadership. The state legislature is actively considering adopting a Kratom Consumer Protection Act framework that permits the sale of kratom subject to proper labeling and testing. This legislation regulates labeling, age limits, manufacturing standards, and prohibits



7-hydroxymitragynine and other synthetic derivatives. It provides consumer safety without driving residents to unregulated and unsafe markets. A city-level ban on natural kratom would contradict this pathway and create regulatory inconsistency within Missouri.

From a medical science perspective, the safest and most effective policy distinguishes natural plant material from synthetic or chemically modified derivatives. The medical and toxicological literature consistently shows that natural kratom has a significantly lower risk profile. Last year, the FDA published their own human clinical trial on kratom testing upwards of 7 times a commercial serving of mitragynine, the primary alkaloid found in natural kratom, and such a study found no severe adverse events and showed that even in high doses, kratom was safe and well tolerated in an adult population. Similarly, survey research from Johns Hopkins demonstrates low rates of serious adverse events associated with natural kratom consumption and widespread self-reported use for health-related purposes. The data clearly support the regulation of kratom, not prohibition.

In addition to a ban on kratom being contradictory to the scientific literature highlighting its appropriate use, doing so causes consumer confusion and restricts access to otherwise legal botanicals based on arbitrary geographic borders. Since the state and federal government permit the sale of kratom, those in possession of the otherwise legal botanicals may be made into criminals simply by entering the Kansas City city limits. This will also task your regulators with an enormous administrative burden to enforce such regulations.

BBHW urges Kansas City to follow the science and the direction of Missouri state and federal leadership. A regulatory model for kratom that prohibits concentrated 7-hydroxymitragynine and other synthetic derivatives, sets manufacturing and testing requirements, and establishes age restrictions is the most protective approach for public health.

I would welcome the opportunity to provide technical expertise, review draft language, or participate in any educational sessions for City leaders. My objective, and the mission of



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BBHW, is to ensure that policy decisions are driven by science and support safe consumer access while removing dangerous synthetic substances from the market.

Thank you for your attention to this important issue and for your leadership in protecting Kansas City residents through evidence-based policy decisions.

Sincerely,

Paloma Lehfeldt, MD, MA

Medical Director

Botanicals for Better Health and Wellness (BBHW)