

EIGHT-FACTOR ANALYSIS: INDUSTRY-FUNDED REVIEW USED IN REGULATORY DEBATES

What the Analysis Is

- **CSA eight-factor analysis for drug scheduling**
- **Commissioned by industry to oppose scheduling**
- **Submitted to federal agencies in review**

WHAT IT CONCLUDES

- Claims kratom has lower abuse potential than traditional opioids
- Argues there is no imminent public health risk
- Recommends continued access rather than scheduling

CRITICAL CONCERNS

- Relies heavily on literature review and selected data interpretation
- Downplays dependence, withdrawal, and opioid receptor activity
- Does not reflect real-world products, extracts, or evolving market potency

WHY THIS MATTERS FOR POLICY

- Eight-factor analyses can influence DEA scheduling decisions
- Selective interpretation may delay regulatory action
- Legislators may receive conclusions without full context of limitations

PinneyAssociates

The Abuse Potential of
Kratom and 7-
Hydroxymitragynine
According to the 8 Factors of
the Controlled Substances
Act

Developed for the Ohio Board of
Pharmacy

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Visit Our Website
www.antikratom.org

SOURCE: PINNEY ASSOCIATES / HENNINGFIELD EIGHT-FACTOR ANALYSIS
SUBMITTED IN REGULATORY PROCEEDINGS REVIEWED PUBLICATIONS AND
REGULATORY SUBMISSIONS