



October 20, 2023

The Honorable Anne Milgram
Administrator
Drug Enforcement Administration
8701 Morrissette Drive
Springfield, VA 22152

Dear Administrator Milgram,

I am writing to you as the President of the Ethics and Religious Liberty Commission (ERLC). Our organization serves as the public policy arm of the Southern Baptist Convention (SBC), the nation's largest Protestant denomination, with over 47,000 churches and over 13 million members.

On August 29th, the Health and Human Services (HHS) agency recommended the reclassification of marijuana from a Schedule I to a Schedule III illicit drug under the Controlled Substances Act (CSA) (21 U.S. Code § 801). This recommendation is the culmination of the [Biden](#) Administration's year-long review of marijuana policy and research, but more accurately, this recommendation is a central piece of the Administration's politically-motivated marijuana decriminalization package. As a result, I am writing to convey the perspective of Southern Baptists with regards to marijuana and its impact on our society, specifically in response to the news of this potential reclassification.

Southern Baptists have historically objected to marijuana usage due to a combination of legal and moral concerns, stretching back 50 years to the Southern Baptist Convention's [Resolution on Alcohol and Other Drugs](#) from 1973. In this resolution, Southern Baptists expressed a desire to "restrain commercial promotion" of harmful and addictive drugs, including marijuana. We believe that all people are made in the image of God and desire to see public policy promote the good and flourishing of all of our neighbors. Since marijuana usage leads to a host of public health concerns, and the legal inconsistencies associated with marijuana use pose a public safety threat and fundamentally undermine our institutions, we oppose this reclassification.

First, marijuana usage generally harms public health and undermines a well-functioning society. Marijuana is the most commonly used illegal drug in the U.S., with an estimated [48.2 million Americans](#) reporting use in 2019. According to the [National Institute on Drug Abuse](#), 30% of marijuana users exhibit "marijuana use disorder," often associated with an addiction-based dependence on marijuana. Additionally, daily marijuana use reached its peak in 2022, with [11% of adults aged 19-30](#) reporting daily use. The addictive nature of marijuana is not a question, but a reality.



Marijuana has remained a Schedule I illicit drug, as designated by both the FDA and the DEA, for the past 50 years; this means that the likelihood of abuse and addiction to this illicit drug is severe, and there are no perceived medicinal benefits. As recently as 2016, this classification was upheld. Reclassification from a Schedule I to a Schedule III status retains the illegal nature of this drug, but removes the emphasis on the addictive nature. **However, marijuana has remained a highly addictive substance since it was initially designated as a Schedule I drug, and the FDA has never approved a marketing application for marijuana for the treatment of any disease or condition.**

Second, marijuana usage, possession, and trade remain illegal under federal law. Though many states have taken various steps towards decriminalizing marijuana, the Department of Justice has [stated](#) that refusal by states to enforce the law does not negate the legal reality of the law; marijuana is still decidedly illegal. The attempt to relegate marijuana to a Schedule III status does not change the legal status of this drug, but it may make enforcement of federal law still less likely.

The confusing nature of shifting enforcement and policy stances that directly contradict sound research makes it difficult for Americans to wisely consider the ramifications of their actions. Such confusion sows distrust in our judicial and legislative institutions, from a local to a federal level, and undermines the perceived soundness of the law. If states can choose at will whether or not to enforce federal law, are they not contesting the legitimacy of the federal government?

Southern Baptists believe that a pro-life view of human dignity extends beyond the womb to all areas of life, including family and community relationships. As the drug abuse epidemic in our nation continues to rise, the ERLC remains committed to combating this growing problem. Those addicted deserve our respect and compassion, along with the devotion of Congress and federal law to provide solutions that best serve each individual.

In light of these concerns, we urge the Drug Enforcement Administration to reject the proposed recommendation from HHS and the FDA by retaining marijuana's classification status as a Schedule I substance under the CSA. Thank you for your attention to these important matters.

Respectfully,

Frederick Brent Leatherwood
President Ethics & Religious Liberty Commission
of the Southern Baptist Convention