

# **SUPPORT SB 2408**

## **Written Testimony**

*Support the synthetic-derivative controls, keep natural kratom leaf legal*

**To:** North Dakota Special Ad Hoc Policy Committee / Joint Policy Committee

**Re:** SB 2408

**Position:** Support

**Hearing:** September 1 and September 2, 2026

**Submitted by:** Christopher, Owner and Operator, Christopher's Organic Botanicals

**Date:** August 29, 2026

Members of the Committee, thank you for the opportunity to submit testimony in support of SB 2408. I support North Dakota taking decisive action against high-concentration, synthetically produced, chemically converted, or otherwise manipulated mitragynine derivatives that are being sold as if they are ordinary kratom. Those products are not the same thing as traditional, unadulterated *Mitragyna speciosa* leaf, and the law should reflect that distinction clearly.

SB 2408 addresses 7-hydroxymitragynine above a defined threshold and also identifies mitragynine pseudoindoxyl, MGM-15, MGM-16, and 7-acetoxymitragynine. I support the bill's intent to remove these synthetic or heavily manipulated products from ordinary retail commerce. The rapid growth of concentrated 7-OH products has created a market that looks very different from the traditional kratom leaf market that consumers have known for years.

At the same time, I respectfully ask the Legislature to make one point unmistakable in the final language: keep natural kratom leaf legal. Trace amounts of 7-hydroxymitragynine can occur naturally in kratom leaf. Natural occurrence should not be confused with products manufactured or processed to create pharmacologically concentrated amounts of 7-OH or other derivatives. A Schedule I law aimed at synthetic derivatives should not be broadened into a ban on unadulterated leaf or compliant natural kratom products.

The cleanest policy line is to target synthesis, chemical conversion, enrichment, isolation, and concentration while preserving ordinary botanical material that remains within the bill's natural-leaf threshold and is sold under a responsible regulatory framework. I also urge the Legislature to ensure that products lawfully regulated under HB 1628 are not inadvertently swept into Schedule I solely because they contain the naturally occurring chemistry of the plant.

I have spent years working in natural kratom, lab testing, labeling, consumer education, and responsible product standards. I strongly support separating traditional leaf from the new generation of high-potency synthetic and semi-synthetic products. That distinction protects consumers, gives law enforcement a clearer target, and avoids punishing responsible adults and compliant businesses that have nothing to do with the products driving the current concern.

Please pass SB 2408 with clear language that keeps natural kratom leaf legal and confines Schedule I treatment to the synthetic, chemically converted, enriched, or otherwise high-potency derivatives the bill is intended to address.

*Respectfully submitted,*

**Christopher**

Owner and Operator, Christopher's Organic Botanicals

Natural kratom advocate and small-business operator