
BULLETIN: 2019 – 012
Effective Date: August 12, 2019

Changes to Medical Cannabis Regulations Take Effect

Linthicum, MD (August 12, 2019) - The Maryland Medical Cannabis Commission (“MMCC”) is pleased to announce the adoption of regulatory changes to Maryland’s medical cannabis regulations, Code of Maryland Regulations (COMAR) 10.62.

The MMCC submitted the final regulations to the Division of State Documents on July 23, 2019, and the Notice of Final Action was published in the *Maryland Register* on August 2, 2019. The final regulations are the result of 16 months of collaborative rulemaking efforts by MMCC Commissioners, medical cannabis businesses, patients, providers, and other stakeholders. The MMCC held 12 public hearings and received nearly 400 public comments on the regulations during the rulemaking process.

The final regulations amend 23 chapters of Title, 10, Subtitle 62, and include several important additions and revisions:

- Requiring heavy metals testing on all medical cannabis and medical cannabis products,
- Authorizing registered third-party businesses to transport medical cannabis,
- Establishing administrative hearing procedures,
- Streamlining penalty provisions for violators, and
- Updating all provider-related provisions to include dentists, certified nurse midwives and nurse practitioners, and podiatrists.

Effective August 12, 2019, medical cannabis licensees, third-party vendors, providers, and patients must comply with the regulatory changes, with two exceptions. First, the **MMCC will postpone implementation of the requirement for medical cannabis licensees and independent testing laboratories to register each “secure medical cannabis transport vehicle” (COMAR 10.62.01.01B.(33)) with the MMCC for 90-days, until November 10, 2019.** Additional guidance on the secure medical cannabis transport vehicle requirements and registration process will be disseminated to licensees and registrants in the coming weeks. Second, the **MMCC will not enforce the COMAR 10.62.18.05 requirement for a secure transportation company or licensed grower, processor, or dispensary to use at least two agents to transport medical cannabis.** Rather, the prior requirement for at least *one* agent will remain in effect. The MMCC Policy Committee will consider a regulatory proposal to amend the regulation to permanently strike the two agent requirement on August 27, 2019.

The official version of COMAR 10.62 may be found on the Division of State Document website (<http://www.dsd.state.md.us/COMAR/ComarHome.html>). Please direct any questions on the regulatory changes to Christil.megna@maryland.gov.