



Larry Hogan, Governor • Boyd Rutherford, Lt. Governor • Robert R. Neall, Secretary

***BULLETIN: 2019 - 011***  
***Effective Date: July 20, 2019***

**Sale of Unregulated CBD Items in Dispensary Retail Space**

**Linthicum, MD** (July 20, 2019) - The Maryland Medical Cannabis Commission (the Commission) is providing this bulletin to give guidance and clarity on the sale of unregulated cannabidiol (“CBD”) items in the waiting area of the public zone of a dispensary as defined under COMAR 10.62.27.08B(1)(a).

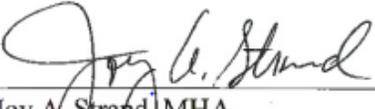
COMAR 10.62.27.08B(1)(a) requires that a licensed dispensary maintain a waiting area open to the general public in the public zone of the dispensary. The Commission is aware of licensees offering unregulated CBD products that are not produced by Maryland-licensed entities and contain ingredients that are not originating within or tested by the Maryland licensed program.

Licensees are reminded that each licensee is responsible for ensuring that its operations meet all legal requirements. Licensees are also reminded that cannabidiol remains a Schedule I substance under the Federal Controlled Substances Act. Licensees are individually responsible for ensuring the legality of any unregulated products they intend to offer for sale.

At this time, the Commission does not intend to take disciplinary action against a licensee offering unregulated CBD products for sale in the waiting area of the public zone of a dispensary, on the condition that a licensee must ensure that each unregulated CBD product is conspicuously labeled to inform the purchaser that the product is not regulated by the Maryland Medical Cannabis Commission and that the product has not been subject to testing by any Maryland-registered independent testing laboratory. In addition, the Commission will pursue disciplinary action if any licensee offers unregulated CBD products for sale in the service area of the public zone of any licensed dispensary.

Dispensaries intending to offer unregulated CBD items for sale in the waiting area of the public zone of a dispensary shall maintain appropriate procedures in the dispensary’s Standard Operating Procedures (SOPs).

This bulletin does not change, remove, or replace any existing regulations under COMAR 10.62.

  
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