



The following guidance is provided by the Maryland Cannabis Administration (MCA) to assist cannabis licensees comply with State laws and regulations governing the cannabis industry. This document is not legal advice. It is meant to highlight operational changes for **all licensed businesses**. Please consult an attorney if you have any questions regarding the legal requirements that apply.

Highlighted Updates

Recent regulatory updates make certain changes for all licensees effective April 14, 2025, including but not limited to the following:

- Codifies a process for how a group of individuals may file a protest with MCA against the renewal of a cannabis license, in conformity with [MD Code, Alcoholic Beverages and Cannabis Article, § 36-411](#). *NOTE: the earliest any license will be due for renewal is 2028.*
- Licensees must report instances of theft or diversion to MCA within 1 business day but are no longer required to notify local law enforcement.

Packaging & Labeling

UPDATED! Bolded text indicates new regulatory provisions that take effect immediately.

General Packaging

Any product submitted into Metrc for approval must comply with all packaging and labeling requirements included in Title 36 of the Alcoholic Beverages and Cannabis Article and COMAR 14.17.

- All packaging must be tamper-evident and child-resistant. Regulations also specify criteria for soft sided and rigid container tamper evident packaging as follows:
 - Soft sided packaging must be sealed at the opening in a way that indicates if the container has been opened or tampered with. Once a package has been opened it must remain obvious that the package has previously been opened. Any soft sided package shall be four mil or greater in thickness.
 - Any rigid container must have a tamper evident seal. Alternatively, the lid or enclosure can have an adhesive band or seal that, once opened, must remain obvious that the package has previously been opened.
 - Rigid containers include: Glass jars, tin cartons, metal tubes, etc.
- Any package containing multiple servings must be resealable.

General Labeling

- Label text must be printed in English. It must also be no smaller than six-point font or 1/12 inch. Except as otherwise specified, required label text must be printed directly on, or on a label or sticker affixed directly to, the marketing layer.
- The following warning statements are required on the general product labels:

"The contents may only be lawfully consumed by a consumer 21 years old or older, or a registered medical cannabis patient."

"Consumption of cannabis may impair your ability to drive a car or operate machinery. Please use extreme caution."

"There may be health risks associated with cannabis use, especially if pregnant or breastfeeding."

"This package contains cannabis. Keep out of reach of children and animals."

- Any product intended for topical application must include a statement identifying that the product is not intended for human consumption, ingestion, or inhalation.
- The following details are required on the label, when applicable to the product:
 - Net weight of the cannabis or cannabis product
 - Finished product lot number
 - Name of the licensee that packaged the product
 - Name and phone number of the licensee that manufactured the product
 - A list of any solvents used to produce the product
 - The date that product was harvested, packaged, or produced
 - Expiration or best-used-by date
 - An itemization, including weight, of all cannabinoid and terpene ingredients—may be printed on an inner layer, accessible via QR code, **or another type of web link.**
 - A list of all major allergens contained in and used to manufacture the cannabis finished product, specifically milk, eggs, fish, crustacean shellfish, tree nuts, peanuts, wheat and soybeans—may be printed on an inner layer, or accessible via QR code, **or another type of web link.**
 - A list of all noncannabis ingredients—may be printed on an inner layer, or accessible via QR code, **or another type of web link.**
- A certificate of analysis completed by a registered independent testing laboratory must be available on the package through a link or QR code.
- All packages shall display the universal symbol and the universal symbol must now appear:
 - On the front or most predominantly displayed area of the package;
 - In an area no smaller than ½ inch by ½ inch;
 - In the form provided by the Administration and may not be modified, recreated, stylized, stretched, or otherwise distorted; and
 - On a background where the symbol is clearly distinguishable and identifiable.

The MCA issued additional guidance on how to remediate products under previously compliant labeling with the new regulatory requirements. This guidance may be found on cannabis.maryland.gov.

Medical Cannabis Product Packaging and Labeling

- All "General Packaging" and "General Labeling" requirements apply to products sold to patients and caregivers
- Existing requirements for packaging to maintain space for a licensed dispensary to attach a personalized label for the qualifying patient continue to apply to any product sold to a medical cannabis patient.
- A licensed dispensary should continue to apply a personalized label with the information currently required under COMAR 14.17.18.04.
- Medical cannabis product warning statements may be applied on a personalized label applied at the point of sale, rather than on the packaging applied by the grower or processor.
- For products that may be sold to either qualifying patients or adult-use consumers (i.e. concentrated cannabis products with a total weight of 1 gram or less), the medical cannabis product warning statements do not need to be applied to products sold to adult-use consumers.

Edible Cannabis Product Packaging

- A package containing multiple servings must (1) be resealable and (2) include a label that (i) identifies each cannabinoid and terpene compound and (ii) lists ingredients in descending order of prominence (unchanged).
- Emergency regulations add the following requirements:
 - Milligrams per single serving and per package of total THC, total CBD, and any other marketed cannabinoid;
 - The number of servings per package and, if applicable, the recommended size of a serving;
 - A warning label that states, "Effects of this product may be delayed by 4 or more hours.";
 - Multiple, individually packaged single serving products may be packaged together by a licensed processor using a marketing layer if the marketing layer contains the necessary labels, warnings, and standards set forth in regulation; and does not combine products the THC content of which exceeds 100 milligrams.
 - A nutritional fact panel – This label text may be accessible via link or QR code **or** printed on an inner layer.
- **UPDATED!** Edible cannabis transferred from the premises of a registered entity for the purposes of research and development must comply with COMAR 14.17.19.02, specifically:
 - Be packaged in accordance with COMAR 14.17.18.05;
 - Be labeled with the statements:
 - **"CAUTION: THIS PRODUCT IS FOR APPROVED R&D USAGE ONLY."**

- “This product has not been approved by the Administration and is intended for research and development purposes only.”
- Identify the name and telephone number of the entity who manufactured the product; and
- Include a unique identifying number.

Packaging and Labeling Requirements of Cannabis Seeds, Clones, and Seedlings

- All Home Cultivation products (Cannabis Seeds, Clones, and Seedlings) must include the following on their label:
 - The name of the licensed facility where the product was derived or propagated;
 - The name of the licensed dispensary where the product is being sold;
 - The net weight of the product (or, if seeds, the number of seeds in the package); and
 - A warning label that states “For home cultivation only. Must be 21 years old or older or a registered patient for home cultivation.”
- Additionally, the packaging for cannabis seeds must:
 - Keep cannabis seeds dry;
 - Prevent germination of the seeds in the packaging; and
 - Not impart any deleterious substances into the cannabis seeds.
- Outside of the requirements outlined above home cultivation products are exempt from packaging and labeling requirements for cannabis and cannabis products.

Prohibited Packaging and Labeling

- Product packaging and labeling ***may not***:
 - Bear any image that may appeal to minors, including:
 - Resemblance to a commercially available candy, snack, baked good or beverage;
 - Images of food, candy, baked goods, cereal, fruit, beverages, or the words “candy” or “candies”
 - Display a cartoon, color scheme, image, graphic or feature that might make the package attractive to children.
 - Display artwork or design that could reasonably mislead any person to believe that the package contains anything other than a cannabis finished product;
 - Display a seal, flag, crest, coat of arms, or other insignia that could reasonably mislead any person to believe that the product has been endorsed, manufactured, or used by any state, county or municipality or any agency thereof;
 - Display false or misleading statements; and
 - Depiction of any form of consumption of cannabis or cannabis products
 - Depiction of overconsumption or intoxicating effects of cannabis or cannabis products
 - Claims regarding health or physical benefits to the consumer.
- A label, marketing layer or any other aspect of the product package obscuring any required warnings, statements, or information.

Other Operational Considerations

- Prior to making any modification or renovations to certain areas of a licensed premises, licensees must receive prior approval by the Administration. Licensees should use MCA's [Request for Modification/Renovation of Premises Form](#) to be granted approval for their proposed modification or renovation.
- Visitors to any operational areas of the premises must be continually, physically supervised at all times while on the premises. Video surveillance does not suffice for meeting supervision requirements. For growers and processors, individuals who are on the premises for the narrow purposes of package delivery, or other services that do not involve areas of the premises used for cannabis cultivation or processing are exempted from this requirement.

Questions?

Visit cannabis.maryland.gov or use the [MCA Policy Question Intake form](#) to submit policy questions related to cannabis regulations, legislation, issued guidance, or licensing. MCA will review submissions and publish an updated FAQ document to the [Laws & Regulations](#) page.