



Micro Dispensary Listening Session

June 26, 2025



Micro Dispensary Defined

[Alcoholic Beverages & Cannabis Article § 36-401\(c\)\(2\)\(iii\)](#) authorizes a micro dispensary to operate a delivery service that sells cannabis or cannabis products without a physical storefront, provided that the licensee employs not more than 10 employees.

Micro Dispensary License

A micro dispensary license is authorized to:

- Deliver cannabis to residences and medical facilities in its authorized service area
- No dispensing from the storage facility
- May repackage bulk cannabis into pre-rolls in accordance with [COMAR 14.17.13.11](#)

See [COMAR 14.17.07.07](#)

Authorized Service Area

- A micro dispensary's authorized service area includes the region in which its license was awarded, i.e. central, eastern, southern, or western
- A micro dispensary may only make deliveries in its authorized service area
- May store cannabis in a facility outside of the service area
- May transit outside of the service area for stocking/restocking or when it is most efficient, as part of a planned delivery route
- Petition to expand

See [COMAR 14.17.07.07](#)

Possible Operational Models

Model 1: Own-Storage Model

- Operates and secures its own storage facility in accordance with [COMAR 14.17.12.03C](#)
- Manages & controls inventory

Model 2: Grower/Processor Storage Sharing

- Stores cannabis at grower/processor premises in accordance with COMAR 14.17.12.03C
- Micro licensee's inventory must be stored separately from the other licensee's inventory
- Manages & controls inventory

Possible Operational Models (Continued)

Model 3: Dispensary Storage Sharing

- Micro dispensary manages & controls its own inventory but uses a separate vault on the premises of another standard dispensary, provided the vault complies with [COMAR 14.17.12.02G\(2\)](#)
- Micro licensee's products must be separated from the standard dispensary's inventory

Model 4: Delivery Partnership with Standard Dispensary

- Micro dispensary does not have its own inventory; rather it partners with one or more standard dispensaries to deliver cannabis to medical and adult-use consumers on behalf of the standard dispensary.

Who is an employee?

- A micro dispensary may employ up to 10 agents – see [*Alcoholic Beverages & Cannabis Article § 36-401\(c\)\(2\)\(iii\)*](#)
- An individual who volunteers or works for a licensee must be registered as an agent & wear an MCA-issued badge – see [*COMAR 14.17.15.02*](#)

Storage Requirements – General

A micro dispensary storage facility operated by the micro dispensary itself or a grower or processor licensee must:

- Be located in Maryland
- Maintain relevant and current building codes and standards
- Be constructed to prevent unauthorized entry
- In areas where cannabis is stored, provide adequate lighting, ventilation, temperature, humidity, space, and equipment to maintain product quality
- Be maintained in a clean and orderly condition
- Be free from infestation by insects, rodents, birds, and pests of any kind

See [COMAR 14.17.12.03C](#)

Storage Requirements – Security

- Must limit access to only the micro dispensary's owner, agents, and if applicable, the owner and agents of the licensee that controls or operates the storage facility;
- Lighting fixtures to ensure proper surveillance
- Security alarm system must:
 - Cover perimeter entry points and portals at all premises, rooms that hold cannabis, and locations where records are stored on- and off-site
 - Be continuously monitored, capable of detecting smoke/fire/power loss, include panic alarm devices
- Motion-activated video surveillance recording system capable of clearly revealing facial detail, operates 24/7 and 365 without interruption, provides date & time stamp for every recorded frame, capture activity at each area and entrance to an area where cannabis is packaged, stored, or prepared for transport
- Keep all locks & security systems in good working order

See [COMAR 14.17.12.03C](#)

Vehicle Requirements

- Operated by at least one agent & *only* agents may occupy the delivery vehicle while it contains cannabis or cannabis products
- Have & display current vehicle registration
- Insured as required by State law
- Equipped with:
 - GPS that enables vehicle location monitoring for all delivery routes
 - Locked and secure storage containers anchored to the inside of the vehicle
 - A motion-activated video-surveillance system that captures activity around all storage containers that contain cannabis or cannabis products
- Conceals storage containers so they are not visible or identifiable from outside of the vehicle; and
- Does not display any sign or illustration related to cannabis, cannabis products, or a cannabis licensee

See COMAR 14.17.12.03D(10)

Hours of Operation

No deliveries should occur before 8am or after 11pm – MCA will apply a 30-minute grace period for deliveries after 11pm.

Example: If delivery driver expects to complete its final delivery by 11pm but gets stuck in traffic on the way, it can complete the delivery until 11:30pm.

Any order **received after** 11pm should be scheduled for delivery the following day.

See [COMAR 14.17.12.09](#)

Ordering System

- Prior to order placement, must validate the individual ordering is 21+ or patient/caregiver
- Include a notice that valid, government-issued photo ID required to receive order
- Collect the name and DOB of the individual submitting order

See COMAR 14.17.12.03D(1) & [.08](#)

Delivery Operations

- Travel only in Maryland, between licensees, registrants, or from one delivery address to another delivery address
- Only make deliveries to residences as defined in COMAR 14.17.01 and medical facilities in authorized service area
- Agents conducting deliveries shall wear a body camera while they are operating a delivery vehicle that contains cannabis
- While in transit, agents may not wear clothing or symbols that indicate ownership/possession of cannabis
- Transport cannabis in one or more locked and secure containers that may not be accessible while in transit

Delivery Restrictions

- May not carry more than **\$5,000** worth of cannabis at any time
- No deliveries should occur without:
 - A prior order submitted to the dispensary
 - Proper manifest in Metrc
- No dispensing from the storage facility, i.e. no “ice cream truck” model
- No transport of products not associated with an active invoice, order, or product manifest

Required SOPs

Included but not limited to:

- Inventory control
- Receiving cannabis
- Storage
- Cleaning, maintenance
- Handling, packaging, labeling
- Green waste
- Security and visitor procedures
- Dispensing
- Delivery
- Repackaging

See full list: [COMAR 14.17.12.11](#)

Agents must be trained on SOPs. SOPs must accurately reflect current procedures & be available on-site for inspection.

Questions?

What is Metrc?

- Metrc = Marijuana Enforcement Tracking Reporting & Compliance
- The seed-to-sale tracking system for Maryland's cannabis program
- Tracks cannabis from growth to sale
- Ensures chain of custody, compliance, and diversion prevention

Metrc Core Functions

- **Inventory Transfers**
 - All cannabis and cannabis products must be transferred into the licensee's control in Metrc
- **Manifest Creation**
 - A manifest is required before deliveries or inventory movement
- **Sales Reporting**
 - Licensees must log all sales within Metrc to maintain compliance

Key Metric Responsibilities

- Accept product into system BEFORE:
 - Deliveries
 - Transportation
 - Storage
- Maintain accurate logs:
 - Inventory levels
 - Delivery manifest details
 - Daily reports

Metrc Hardware & Tools

- RFID tags for inventory
- Online dashboard access
- Use of third-party integrators possible (POS, logistics) Dutchie etc.
- Training and support offered via Metrc Learn website
 - MCA will schedule special training for micro dispensaries as they use unique functions for Metrc reporting

Metrc information:

<https://www.metrc.com/partner/maryland/>

Summary & Next Steps

- Review all applicable regulations, laws, and compliance guidance
- Choose an operational model that fits your resources
- Look for Metrc training invitation
- Start outreach for vault or storage partners if needed

Regulations & Statute

- [COMAR 14.17.01 Definitions](#)
- [COMAR 14.17.02 General Regulations](#)
- [COMAR 14.17.07 Micro Licenses](#)
- [COMAR 14.17.12 Cannabis Dispensary Operations](#)
- [COMAR 14.17.13 Cannabis Products](#)
- [COMAR 14.17.14 Complaints, Enforcement, Record Keeping, and Inspections of Cannabis Businesses](#)
- [COMAR 14.17.15 Cannabis Business Agents](#)
- [COMAR 14.17.16 Cannabis Business Owners](#)
- [COMAR 14.17.20 Prohibited Acts](#)
- [Alcoholic Beverages and Cannabis § 36-401](#)

This list is not exhaustive. MCA advises conditional licensees to review all cannabis regulations and laws.

Questions?

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