



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 regulatory changes for licensees. Please consult an attorney if you have any questions regarding the legal requirements that apply.

Conditional Licensee Extensions

In October 2025, the Maryland Cannabis Administration (MCA) extended the conditional license period for all conditional licensees from 18 to 24 months. On September 4, 2026, MCA adopted amendments to [COMAR 14.17.05.05](#) Issuance of a License or Rescission of a Conditional License. These regulations codify a process to request two six-month extensions to the conditional license period in certain circumstances.

The MCA is codifying this process to give conditional licensees additional time, if needed, to become operational.

Eligibility

A conditional licensee may be eligible for an initial extension if they have demonstrated active interest in, legal control of, or legal possession of a premises. This premises must be suitable for the licensee's cannabis operations and it must comply with local planning and zoning requirements. The MCA will accept documentation of active interest such as a letter of intent, an option to lease or purchase the proposed premises, or other documentation evidencing permission to use the premises for cannabis operations.

Upon MCA approval, the first extension will add six months to the 24 month conditional license period, bringing the conditional license period to 30 months.

A conditional licensee may be eligible for a second extension if they have demonstrated legal control of or possession of a premises. This premises must be suitable for the licensee's cannabis operations and it must comply with local planning and zoning requirements. The MCA will accept documentation of legal control or possession such as a clear legal title, a fully executed or binding lease agreement, or other documentation evidencing control or possession of a premises.

Premises

A premises must be suitable for cannabis operations and comply with local planning and zoning requirements. Licensees are responsible for ensuring their premises are suitable and in compliance.

If you have received an initial extension to your conditional period based on active interest in a premises, but you are ultimately unable to take legal control or possession of that premises, you still have the time remaining on your initial extension.

You may request a second extension only if you can demonstrate legal control or possession of a suitable premises. It does not have to be the same premises used for the first extension.

If a political subdivision has unduly burdened a licensee's efforts towards becoming operational, the conditional licensee must provide documentation of the burden. The MCA will review this documentation and use its discretion to make a determination regarding the requested extension.

Further Extensions

Licensees are encouraged to remain in consistent contact with the MCA and their assigned MCA Inspector throughout the conditional license period.

If a conditional licensee is not operational by the day following the expiration of its second extension, the MCA may revoke a conditional license pursuant to MD Code, Alcoholic Beverages and Cannabis, § 36-401.