



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 **licensed processors**. Please consult an attorney if you have any questions regarding the legal requirements that apply.

Highlighted Updates

Recent updates to regulations make certain changes for processor licensees, with an anticipated effective date of March 2, 2026, including but not limited to the following:

- High potency liquid edibles may be produced in accordance with COMAR 14.17.13.05G.
- Codifies the [existing hemp acquisition process](#).
- Codifies corrective and preventive action (CAPA) procedures a processor must take when test results indicate the presence of a pathogen.

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

Products

Liquid Edibles

For the purposes of producing a liquid edible product, one single container is a single serving of product, and it may not contain more than 10 milligrams (mg) of tetrahydrocannabinol (THC). Liquid edibles must also comply with the requirements for other edible products in terms of production, packaging, and labeling. This includes limiting the manufacture of these products to facilities with a valid edibles permit.

Product Reservations

The following products may only be sold to qualifying patients and registered caregivers:

- Concentrated cannabis products with a total product weight greater than 1 gram
- Edible cannabis products, capsules, and tinctures containing more than 10 mg THC per serving or 100 mg THC per package

Adult use consumers may purchase:

- Cannabis vaporizing devices (e.g., vapes)
- Concentrated cannabis products with a total weight of 1 gram or less
- Infused flower and pre-rolls of any product weight
- Infused non-edible cannabis products
- Home cultivation products
- Usable cannabis products (e.g., flower, pre-rolls)
- Edible cannabis products, capsules, and tinctures containing up to 10 mg THC per serving or 100 mg of THC per package

Hemp

UPDATED! Regardless of THC content, licensed processors may acquire hemp and hemp-derived products from registered hemp growers if they request approval from MCA prior to accepting delivery through the [hemp acquisition process](#).

Hemp-derived products containing more than 0.5 mg THC per serving or 2.5 mg THC per package may only be sold by licensed dispensaries if they have been manufactured, processed, and tested in accordance with MCA regulations. These products may only be displayed or offered for sale in the restricted area of a dispensary. (Note: THC is defined in Alcoholic Beverages and Cannabis Article § 36-1102(a)(3)).

UPDATED! Corrective and Preventive Action

The processor must use an Administration-registered independent testing laboratory to perform compliance testing for each unique lot of cannabis products. If a product tests positive for the presence of a pathogen then the processor must follow these actions:

- Stop production at the facility.
- Quarantine the affected product and all other products made during or after this production batch.
- Provide a list of the products that were made during or after this production batch with the Metrc ID. The MCA will place the affected product on administrative hold.
- Coordinate with the independent testing laboratory to perform pre-cleaning swabbing of the affected area(s).
- Decontaminate the affected area(s) including the utensils, equipment and the area where packaging and labeling was performed.
- After decontamination, coordinate with the independent testing laboratory to perform post-cleaning swabbing of the affected area(s).
- MCA will review the swabbing analysis and inform the processor if production can resume.

If additional production batches test positive for the presence of a pathogen within a 60 day period, the licensee is required to take corrective and preventive action. At a minimum, these actions must include:

- Environmental swab testing;
- Investigation of root cause of contamination;
- Complete decontamination;
- If appropriate, updated standard operating procedures.

The licensee must provide an investigation report and corrective action plan to the MCA for approval. The MCA may require further investigation and procedural changes to prevent future contamination.

Discrepancy, Theft, and Diversion Reporting

If a licensee identifies a discrepancy between the inventory of stock and the seed-to-sale tracking system outside of normal weight loss, they must begin an investigation of the

discrepancy within 1 business day. If a discrepancy is not resolved within 30 business days, the licensee must submit a report of their investigation to MCA. Failure to report an unresolved discrepancy may be used as evidence of diversion.

If a licensee finds evidence of theft or diversion, the licensee must report the theft or diversion to the Administration within 1 business day.

Within 30 business days of discovering the theft, diversion, or unresolved discrepancy, the licensee must:

- Complete an investigation;
- Amend its standard operating procedures, if necessary; and
- Send a report of the investigation to the MCA.

Other Operational Considerations

- For packaging and labeling guidance, please refer to [COMAR 14.17.18 Finished Product Packaging](#), as well as the General Information and Packaging and Labeling Guidance documents on the Laws and Regulations page.
- Visitors to any operational areas of the premises must be continuously, 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 on the [Laws & Regulations](#) page.