



The following guidance is provided by the Maryland Cannabis Administration (MCA) to assist cannabis licensees in complying with State laws and regulations governing the cannabis industry. This document is not legal advice. It is intended to outline operational guidelines for **micro dispensaries**. Please consult an attorney if you have any questions regarding the applicable legal requirements.

Micro Dispensary Guidance

Highlighted Updates

Recent regulatory and legislative updates make certain changes for micro dispensary licensees, including but not limited to the following:

- Increasing the registered agent limit for micro dispensaries from 10 to 20, effective July 1, 2026.

Micro Dispensary License Overview

UPDATED! A micro dispensary license is authorized to deliver cannabis to residences and medical facilities within an authorized service area. A micro dispensary licensee is not authorized to operate a physical storefront. A micro dispensary may employ no more than **20** registered agents.

See [COMAR 14.17.07.07](#) and [14.17.12.03](#); [Alcoholic Beverages and Cannabis § 36-401\(c\)\(2\)\(iii\)](#)

A micro dispensary may choose one or more of the following models to operate their business:

- 1. Own storage model:** The business possesses up to three of its own storage facilities for cannabis inventory storage;
- 2. Grower/processor storage sharing:** The business stores its cannabis inventory in a physically separate unit with a grower or processor premises;
- 3. Standard dispensary storage:** The business stores its cannabis inventory in a physically separate unit within a standard dispensary's secure room; and
- 4. Delivery partnership with standard dispensary:** The business does not have its own inventory; delivers on behalf of one or more standard dispensaries.

A micro dispensary may choose a combination of these models, provided its cannabis inventory is not stored in more than three places.

Authorized Service Area

An authorized service area is the region in Maryland where the micro dispensary license was awarded, i.e., Central, Eastern, Southern, or Western, and where it may deliver cannabis or cannabis products to residences and medical facilities. A micro dispensary may store its inventory outside of the authorized service area. [COMAR 14.17.12.03C\(1\)](#). It may also transit outside the service area to stock or restock inventory, or when it is most efficient, as part of a planned delivery route. [COMAR 14.17.07.07D\(5\)](#), [14.17.12.03D\(2\)](#). Transit outside of Maryland is never permitted. [COMAR 14.17.12.03C\(1\) & D\(2\)](#).

Once operational, a micro dispensary may petition to expand its authorized service area.. MCA is developing the petition process and will publish information on this process when it becomes available. See [COMAR 14.17.07.07D](#).

Storage Facility Options

All cannabis other than what is being packaged or dispensed daily during a micro dispensary's hours of operation must be kept in their storage facility. Depending on where a micro dispensary stores its inventory, different requirements apply (see table below).

Storage Location	Requirements
Own storage facility	COMAR 14.17.12.03C
Grower/processor facility	COMAR 14.17.12.03C
Standard dispensary facility	COMAR 14.17.12.02

A micro dispensary may use up to three storage facilities to store their inventory. They may choose to store their inventory in multiple of their own storage facilities or a mixture of their own and other licensees' storage areas. Storage facilities do not need to be located within the micro dispensary's authorized service areas, see [COMAR 14.17.07.07D\(5\)](#), but must meet all requirements in [COMAR 14.17.12.03C](#) or [COMAR 14.17.12.02G](#), whichever applies.

When using a storage facility operated by another licensee, the micro dispensary must:

- Ensure its inventory is physically separated from inventory that does not belong to the licensee and accessible only to its agents.
- Have equal, independent, and unique control over access to its inventory, including the ability to add or remove its badged agents to access any area or container in which its inventory is stored; and
- Have equal independent and unique access to its video surveillance recordings, which shall be recorded and saved as required by this regulation or COMAR 14.17.12.02, as applicable.

Note: A delivery partnership between a micro dispensary and a standard dispensary does not count toward a micro dispensary's three permitted cannabis storage facilities.

Adding a New Location or Delivery Partnership

A micro dispensary must obtain approval from the MCA prior to using a new location for cannabis operations, including storage. To notify MCA about the new location, a micro dispensary must complete the [Request for Modification](#).

Conditional licensees must have all agreements reviewed and approved by MCA, including delivery partnership agreements. Fully licensed micro dispensaries may enter into delivery partnership agreements without prior MCA approval, *unless* the agreement impacts ownership, control or management of the licenses. All agreements that impact the ownership, control, or management of a cannabis license must be reviewed and approved by MCA. See [COMAR 14.17.06.05](#).

Requirements for Micro Dispensaries Sharing Storage with Other Licensees

See the list above for comprehensive storage area regulations.

If the micro dispensary stores inventory in a facility controlled by a grower, processor, or standard dispensary, each licensee's inventory must be physically separated. For example, a micro dispensary could store its inventory in a vault within a standard dispensary operations zone. If the licensees were sharing inventory in the same vault, they would need to arrange the vault so that the micro and standard dispensaries can only access their respective inventories, e.g. two locked cages in one room that contain each licensee's inventory. The micro dispensary may only have access to the micro dispensary's inventory, and the host licensee may only have access to the host licensee's inventory. Each licensee must use security alarm systems to prohibit access to storage areas by anyone other than their own agents. Each licensee must have independent and unique access to its own video surveillance and security alarm systems. Each licensee must be able to control who can access the licensee's inventory, and must be able to remove access at will.

A host licensee may use one alarm system for its entire premises provided it has unique zones for each area required to be protected by the alarm system. For example, a grower licensee that hosts a micro dispensary for inventory storage may use one overall security alarm system with unique zones for different areas, including a unique zone for the micro dispensary's designated storage area.

Agent Badging Considerations

A micro dispensary owner must be a registered agent if they work or volunteer in any operational area of a micro dispensary's premises, including delivery vehicles. If an owner does not work or volunteer in any operational areas, they do not have to be a registered agent.

Visitors to micro dispensary premises are subject to the same visitor requirements as other licensees. See COMAR [14.17.12.03K](#).

MCA strongly recommends that a micro dispensary's agents be dually badged if they will be entering any area of another licensee's premises that is used for cannabis operations. A guest at a licensed premises who is not a registered agent employed by that licensee would need to be treated as a visitor to be admitted to an area of the premises used for cannabis operations.

Delivery Operations

[COMAR 14.17.12.03E](#) establishes delivery operations requirements for a micro dispensary.

Deliveries must be made:

- By registered agents with MCA-issued badges.
- Between 8:00 AM and 11:00 PM
 - No deliveries may occur after 11:00 PM; delivery of the product is an element of a sale.
 - Any order received that cannot be fulfilled before 11:00 pm may not be fulfilled until the following day.
 - All cannabis other than what is being packaged or dispensed during these hours must be kept in a storage facility.
- Only to qualifying patients, caregivers, or adults 21+ with a valid ID.
- Using secure, unmarked vehicles equipped with GPS, lockboxes, and motion-activated cameras trained on all cannabis products, with no more than \$5,000 in cannabis products per vehicle, per trip.
- Licensees must retain and produce GPS and video surveillance records to MCA within 48 hours of a request.

See [COMAR 14.17.12.03](#), [.08](#), [.09](#)

Inspections

MCA's general inspection procedures are outlined in the Inspection Guidance on the [MCA website](#).

The MCA may inspect all of a cannabis licensee's premises and operations to ensure conformity with its application, State law, and regulations. An MCA inspection may include, but is not limited to:

- Vehicles;
- Standard operating procedures as required in COMAR 14.17.12.11A;
- All rooms and containers in which cannabis will be stored;
- Video surveillance and security alarm system;
- Delivery platforms for online, phone, or other remote orders;
- Records and anywhere records are stored; and
- Cannabis.

See [COMAR 14.17.14.03](#).

Note: The MCA will not issue a cannabis license to a micro dispensary until the Administration has inspected and deemed compliant at least one delivery vehicle that will be used by the micro dispensary.

Micro dispensary inspections will vary based on the selected business model and number of storage facilities. If a micro dispensary stores its inventory in its own or another licensee's storage facility, the MCA inspection will include but not be limited to delivery vehicles, storage areas, all aspects of the shared space arrangement, security and surveillance systems, and anywhere records are stored. For a micro dispensary that does not have its own inventory, an MCA inspection will include all delivery vehicles, surveillance systems, any contracts between licensees, and anywhere records are stored.

Vehicle Inspections

MCA will inspect all vehicles a micro dispensary intends to use for delivery to ensure compliance with [COMAR 14.17.12.03E\(9\)](#). Cannabis must be delivered in enclosed vehicles that:

- Have and display a current vehicle registration;
 - There is no requirement that a vehicle be owned by or registered to a micro dispensary licensee.
- Are insured as required by law;
- Are equipped with:
 - A global positioning system (GPS) that enables the micro dispensary to monitor the vehicle's location for the entirety of its delivery routes;
 - Locked and secure storage containers anchored to the inside of the vehicle;
 - A **motion-activated** video-surveillance system that captures all storage containers that contain cannabis or cannabis products;
- Conceal storage containers so they are not visible or identifiable from outside of the vehicle; and
- Do not display any sign or illustration related to cannabis, cannabis products, or a cannabis licensee.

MCA will conduct vehicle inspections at the storage location or another mutually agreeable location where and when all vehicles can be inspected at the same time. All delivery vehicles must be inspected and deemed compliant by the MCA prior to use.

Requirements for Cannabis Storage Containers in Vehicles

Cannabis storage containers must be **locked shut** in a manner which will prevent the contents from falling out of the containers if they are dropped or shift in a collision. The containers must be **hidden from view** from outside the vehicle and **inaccessible** to vehicle occupants while the vehicle is in transit. Micro dispensaries may choose between two methods for securing the container inside the vehicle:

1. A secure lockbox (key or combination needed) bolted from within to the body of the vehicle; or
2. Plastic containers zip-tied closed, secured in a locked area, i.e. partitioned, caged, or in a trunk with a supplemental drum-style padlock. Examples: In a sedan, this could be the locked trunk with a supplemental drum style lock. In a cargo van, this could be the vehicle door locks and a locked cage within the cargo area, OR just the factory vehicle door locks and a supplemental drum-style lock installed on each door that accesses the cargo area.

See [COMAR 14.17.12.03E\(8\)](#) and [\(9\)](#).

Adding New Vehicles and Storage Locations

A micro dispensary must submit the [Request for Modification](#) form and obtain approval prior to initiating any of the following business changes:

- Adding a new vehicle;
- Establishing a new storage facility for cannabis inventory.

All vehicles and storage locations must be inspected and approved by MCA prior to use.

Standard Operating Procedures (SOPs)

Micro dispensaries must establish and implement SOPs for all aspects of operations, including but not limited to inventory control, packaging, labeling, receiving, delivery, green waste, and security. The security SOP should include the micro dispensary's plan for video surveillance and GPS records review. Licensees must train agents on all SOPs and make SOPs available for inspection by the MCA upon request. See [COMAR 14.17.12.11A](#).

Inventory Compliance

Micro dispensaries must use MCA's seed-to-sale tracking system, METRC (Marijuana Enforcement Tracking Regulation and Compliance), to track its stock of cannabis from the time it is received by the micro dispensary to the time it is delivered or dispensed to another licensee, qualifying patient, registered caregiver, or adult-use consumer. Daily logs of all inventory, transfers, manifests, and sales must be maintained in METRC. See [COMAR 14.17.09.03](#).

Frequently Asked Questions

Is there a compliance/inspection checklist available for licensees?

[COMAR 14.17.12.03-.11](#) delineate all facility and procedural requirements for micro dispensaries. OCR uses these regulations to assess a micro dispensary's readiness for operations and compliance once operational.

Every application and every conditional licensee is different and the timelines for each application are going to vary depending on the type of license, the number of owners, and a variety of other factors. However, MCA provided [this general timeline](#) in a letter sent to your point-of-contact to assist you in making plans.

Do delivery agents have to wear body-cameras while conducting deliveries?

No. Delivery agents do not have to wear body-cameras while conducting deliveries. However, all delivery vehicles must be equipped with a motion-activated video-surveillance system that captures all storage containers that contain cannabis or cannabis products and a global positioning system (GPS) that enables the micro dispensary to monitor the vehicle's location for the entirety of its delivery routes. Additional vehicle requirements are outlined under "Vehicle Inspections." See COMAR 14.17.12.03E.

Does the shelf-space requirement apply to micro dispensaries?

Yes. [COMAR 14.17.12.06D](#) requires that social equity dispensary licensees ensure that at least 25% of products available for retail sale are grown, manufactured, extracted, or otherwise produced by licensees that have no common ownership interest or control with the dispensary licensee. If a micro dispensary licensee partners with a standard dispensary to deliver the standard dispensary's inventory and does not have its own inventory, the standard dispensary is responsible for compliance with [COMAR 14.17.12.06B](#). MCA will use METRC to monitor compliance with this requirement.

Can a micro dispensary's delivery vehicle serve as storage?

No. A micro dispensary's storage facility may not be a delivery vehicle. [COMAR 14.17.12.03G](#) prohibits dispensing cannabis or cannabis products from the storage facility premises or transporting cannabis not associated with an active invoice, order, or product manifest. Additionally, a micro dispensary licensee may not carry cannabis or cannabis products in the delivery vehicle with a value in excess of \$5,000 at any time. The value of cannabis goods shall be determined using the current retail price of all cannabis or cannabis products carried by or within the delivery vehicle. See [COMAR 14.17.12.03H](#).

UPDATED! Do micro dispensaries have to manually enter tax information in METRC? Can a point-of-sale system automate this?

A point-of-sale system may be used to automate tax information. If a micro-dispensary does not use a point-of-sale system to automate this process, it must be entered manually.

UPDATED! Does MCA permit micro dispensaries to allow adult-use customers to shop anonymously? If it does, how would the MCA like the micro dispensary licensee to accommodate the sale, if name, address, contact, age verification is required? Can a micro dispensary decline to collect customer information?

No. Customer name and address are required to ensure that deliveries are made only to residents and medical facilities in the authorized service area. A micro dispensary must still collect the name and birthday of an individual submitting an online/telephone order for the limited purpose of verifying that the individual accepting the order is the same individual who ordered it. A dispensary's ordering system may offer to save the individual's name and birthdate to create a customer profile but may not create a customer profile record without their express consent. Adult-use consumers must have an opportunity to opt-out of saving their information to create a customer profile. See [COMAR 14.17.12.04B\(10\)](#), [COMAR 14.17.12.08C and D](#), and [COMAR 14.17.12.03E\(3\)](#).

UPDATED! If a standard dispensary and a micro dispensary are partnering to fulfill an order, does all rejected cannabis need to be returned to the standard dispensary at the end of the day? For example, if a standard dispensary closes at 7PM, but for some reason the micro dispensary driver is unable to return to the standard dispensary until 7:40PM; would a dispensary agent need to stay after hours to receive that product back?

Yes. In the scenario above, the MCA recommends that either an agent stay to receive the cannabis or the standard dispensary considers dual badging micro dispensary agents to address this issue. Per [COMAR 14.17.12.03F\(2\)](#), a micro dispensary shall ensure that all cannabis other than that being packaged or dispensed during hours of operation is kept in the storage facility. As such, a micro dispensary must ensure that all cannabis, even cannabis associated with orders that are rejected, is returned to a cannabis storage facility that complies with [14.17.12.03A and B](#).

In alignment with [COMAR 14.17.12.11A\(11\)](#), the MCA also advises that a micro dispensary and standard dispensary who are working in partnership to dispense cannabis establish standard operating procedures to ensure that no cannabis or cannabis product is left overnight in a delivery vehicle, contemplating procedures for scenarios of failed deliveries, deliveries made close to a standard dispensary's closing time, and that addresses how the cannabis will be returned to the standard dispensary if the micro dispensary encounters the inability to return cannabis to a secure storage (car accident, trouble, arrest, etc.).

Note: Licensees must ensure that any cannabis that is unable to be delivered is properly manifested back to the licensee who will be securely storing or green wasting the cannabis, in alignment with [COMAR 14.17.12.03F\(4\)](#).

UPDATED! If a standard dispensary and a micro dispensary are partnering to fulfill an order, does MCA regulate how a patient or adult-use consumer orders cannabis for delivery?

Dispensaries must comply with [14.17.12.08](#) for all online, telephone, and other remote ordering. However, the MCA does allow for flexibility regarding payment platforms and procedures. An online order that involves both a standard dispensary and micro dispensary may be processed through either entity's payment platform, however, the MCA would like to minimize the risk of consumer confusion regarding which entity is responsible for each aspect of a sale. It must be apparent to the consumer who is making the delivery and whose inventory is being shopped.

For example:

- A patient or consumer first goes to the micro dispensary's website, which then directs them to the standard dispensary's menu. In this case it should be clear to the consumer that they are being directed to another dispensary's site or there should be an integration that, for example, shows the standard dispensary's menu on the micro dispensary's website. This can be thought of as the "uber eats model" where the order is placed on the micro dispensary website/app but the menu items are displayed as belonging to the standard dispensary.
- A patient or consumer goes to a standard dispensary's website, which informs them that the standard dispensary partners with a micro dispensary for deliveries. Prior to the patient or consumer finalizing the order, various options could appear including, in-store pick-up, curbside delivery, and home delivery. If home delivery is chosen, a notice appears informing the patient or consumer that their cannabis will be delivered by the micro licensee and provides any pertinent information for the micro licensee (e.g. how to contact, a link to the micro dispensary website, etc.) to help facilitate the delivery.

UPDATED! If a micro dispensary is using a delivery platform for navigation, can they write "See Delivery Platform" in the specific routing field on the METRC manifest, or do they still have to enter specific directions in this field?

A micro-dispensary may enter "See Delivery Platform" or a similar statement, as long as the GPS directions are saved and stored in compliance with [COMAR 14.17.12.03J](#).

MCA encourages early and continuous communication regarding inspection readiness, operational challenges, and compliance solutions.