



MDDCSAM is the Maryland state chapter of the American Society of Addiction Medicine whose members are physicians and other health providers who treat people with substance use disorders. <https://md-dcsam.org>

RE: HB 12 Cannabis - Sale and Distribution - Tetrahydrocannabinol Offenses- Letter of Support
Economic Matters Committee Feb 18, 2025

SUPPORT

Dear Chair Wilson, Vice-Chair Crosby, and members of the committee,

HB 12 expands public health protections for cannabis products.

It authorizes the Alcohol, Tobacco, and Cannabis Commission (ATCC) to issue citations for unlicensed cannabis sales and expands cannabis product packaging and labeling requirements to include all THC products, sets fines for infractions, and seize, destroy, or confiscate unlawful products.

Current Maryland law requires that THC- containing products be sold exclusively in licensed cannabis dispensaries and imposes limits on their THC content, requires testing for contaminants, purity, and potency, and restricts packaging to avoid marketing of cannabis products to minors. Regulatory loopholes are allowing unlicensed retailers, such as gas stations and convenience stores, to sell hemp-derived THC products (delta-8 and delta-10) while ignoring these important public health safeguards.

There is evidence that many of these hemp-derived products contain unlabeled contaminants¹ and harmful by-products from processing,² yet they are not required to undergo any laboratory testing for contaminants, purity, or potency.

Many of these unregulated delta-8 and delta-10-containing hemp products have higher concentrations of these intoxicating cannabinoids than are allowed in regulated products. These hemp-derived THC products are not required to adhere to any packaging standards that would prevent their marketing to minors.

We respectfully urge a favorable report.

¹ Ray, C. L., Bylo, M. P., Pescaglia, J., Gawenis, J. A., & Greenleaf, C. M. (2022). Delta-8 Tetrahydrocannabinol Product Impurities. *Molecules* (Basel, Switzerland), 27(20), 6924. <https://doi.org/10.3390/molecules27206924>

² Meehan-Atrash, J., & Rahman, I. (2022). Novel Δ 8-Tetrahydrocannabinol Vaporizers Contain Unlabeled Adulterants, Unintended Byproducts of Chemical Synthesis, and Heavy Metals. *Chemical research in toxicology*, 35(1), 73–76. <https://doi.org/10.1021/acs.chemrestox.1c00388>