

*MDDCSAM is the Maryland state chapter of the American Society of Addiction Medicine whose members are physicians and other healthcare providers who treat people with substance use disorders.*

February 14, 2025

**UNFAVORABLE**

**RE: HB 132 - Cannabis - On-Site Consumption Establishments and Cannabis Events**

The Maryland-DC Society of Addiction Medicine (MDDCSAM) submits this letter of opposition to **House Bill 132- Cannabis – On-Site Consumption Establishments and Cannabis Events**. HB 132 establishes permissible business operations and other requirements for on-site cannabis consumption establishments and for cannabis events.

MDDCSAM supports HB 132’s goal of enlarging opportunities for social equity cannabis licensees but opposes the bill because it authorizes two new types of venues for consumption of oral cannabis (“edibles” and beverages) without enacting necessary safeguards to minimize potential public health harms to Marylanders. These harms include increased cannabis-impaired driving, increased ingestion of cannabis and alcohol on the same occasion, and potential exposure of minors to cannabis products and advertising. In addition, HB 132 does not include necessary restrictions on the location, advertising and promotion of cannabis events, restrictions which statutorily apply to licensed cannabis dispensaries.

HB 132 expands public access to legal oral cannabis products. Cannabis products ingested orally characteristically take 30-60 minutes to begin exerting their effects and these effects may last for 8-12 hours.<sup>1</sup> This time course means that cannabis consumers at an on-site cannabis consumption establishment or cannabis event may not be visibly intoxicated while on-site. They may remain eligible to purchase multiple single servings of cannabis product, despite the bill’s prohibition of sales to individuals who are “visibly intoxicated. Cannabis consumers are likely to become visibly intoxicated after they leave the site, increasing the risk of motor vehicle crashes and other public health harms.<sup>2,3</sup> In contrast, alcohol intoxication has a very different time course, which begins within minutes after drinking starts and wears off within several hours. Thus, regulations that limit the public health harms of alcohol intoxication are not effective for limiting such harms from oral cannabis intoxication.

MDDCSAM supports the goal of limiting on-site consumption by the individual consumer. Because there is no immediate effect from oral cannabis (as there is with inhaled cannabis), users may unintentionally over-consume, thinking they have not taken a sufficient dose. HB 132’s sales limit to single-servings will not prevent such over consumption. Nothing in the bill prohibits repeated sales to the same customer as long as they are not “visibly intoxicated.” However, as noted above, customers are unlikely to become intoxicated until after leaving the establishment.

MDDCSAM is also concerned that HB 132 does not place any restrictions on where cannabis events can be located and does not clarify whether advertising restrictions apply to cannabis events. Current Maryland law prohibits licensed cannabis dispensaries from locating within 500 feet of pre-existing public spaces where children are likely to be present and from advertising or sponsoring events unless the audience is reasonably expected to be 21 years or older. These statutory restrictions are based on public health research showing that exposure to cannabis dispensaries or cannabis advertising is associated with positive attitudes towards cannabis use and increased use.<sup>4,5</sup> HB 132 does give local jurisdictions authority to ban or regulate on-site cannabis consumption establishments and cannabis events, but MDDCSAM believes that these important public health concerns warrant state-wide statutory protection.

Finally, MDDCSAM is concerned that the presence and consumption of both cannabis and alcohol would be allowed at some cannabis events. This combination of two intoxicants is associated with increased severity of intoxication<sup>6</sup> and contravenes current Maryland public health messaging that strongly advises against such use.

Passage of HB 132 would make Maryland a pioneer in this area. Only one state with an on-site cannabis consumption program limits consumption to edibles only,<sup>7</sup> so there are insufficient data to identify and mitigate potential public health harms.

MDDCSAM strongly opposes this bill even were it amended to allow on-site consumption of inhaled cannabis products (smoke or vaporized). The public health harms mentioned above occur regardless of the form in which cannabis is consumed.

For these reasons, MDDCSAM respectfully urges this Committee to issue an unfavorable report on HB 132 and further urges the General Assembly to delay the current statutory mandate that the Maryland Cannabis Administration implement a program of on-site cannabis consumption establishments and cannabis events.

Thank you for the opportunity to submit this testimony.

1 Schlienz NJ, Spindle TR, Cone EJ, Herrmann ES, Bigelow GE, Mitchell JM, Flegel R, LoDico C, Vandrey R. Pharmacodynamic dose effects of oral cannabis ingestion in healthy adults who infrequently use cannabis. *Drug Alcohol Depend.* 2020 Mar 21;211:107969. doi: 10.1016/j.drugalcdep.2020.107969. PMID: 32298998; PMCID: PMC8221366.

<sup>2</sup> Adhikari, K., Maas, A., & Trujillo-Barrera, A. (2023). Revisiting the effect of recreational marijuana on traffic fatalities. *The International journal on drug policy*, 115, 104000. <https://doi.org/10.1016/j.drugpo.2023.104000>

<sup>3</sup> Pearlson GD, Stevens MC, D'Souza DC. Cannabis and Driving. *Front Psychiatry.* 2021 Sep 24;12:689444. doi: 10.3389/fpsyt.2021.689444. PMID: 34630173; PMCID: PMC8499672.

<sup>4</sup> Han B, Shi Y. Associations of recreational cannabis dispensaries' availability, storefront signage and health benefit signs with cannabis use: findings from a representative adult sample in California, 4 United States. *Addiction.* 2023;118:1270–1279. DOI: 10.1111/add.16132.

<sup>5</sup> Caislin L, Firth CL, Beatriz Carlini B, Julia Dilley J, Katarina Guttmannova K, and Anjum Hajat A. Retail cannabis environment and adolescent use: The role of advertising and retailers near home and school. *Health & Place* 75 (2022) 102795. [doi.org/10.1016/j.healthplace.2022.102795](https://doi.org/10.1016/j.healthplace.2022.102795)

<sup>6</sup> Simmons SM, Caird JK, Sterzer F, and Asbridge M. The effects of cannabis and alcohol on driving performance and driver behaviour: a systematic review and meta-analysis. *Addiction.* 2022;117:1843–1856. DOI: 10.1111/add.15770

<sup>7</sup> State-By-State On-Site Consumption Laws. Maryland Policy Project 2025. <https://www.mpp.org/issues/legalization/state-by-state-on-site-consumption-laws/> (accessed Jan. 25, 2025).