



*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.*

January 28, 2025

The Honorable Pamela Beidle  
Chair, Finance Committee  
3 East Miller Senate Office Building  
Annapolis, MD 21401-1991

**RE: SB 214**

**Cannabis - Sale and Distribution - Tetrahydrocannabinol Offenses- Letter of Support**

Dear Chair Beidle:

The Maryland-DC Society of Addiction Medicine (MDDCSAM) submits this letter of support for **Senate Bill 214- Cannabis - Sale and Distribution - Tetrahydrocannabinol Offenses**. SB 214 authorize officers of the field enforcement division of 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 tetrahydrocannabinol (THC) products, sets fines for infractions, and authorizes ATCC to seize, destroy, or confiscate unlawful products.

MDDCSAM supports SB 214 because it expands existing public health protections for cannabis products and enhances the ATCC's enforcement powers. 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 contaminants<sup>1</sup> and harmful by-products from processing,<sup>2</sup> yet they are not required to undergo any laboratory testing for contaminants, purity, or potency. Many delta-8 and delta-10-containing hemp products have higher concentrations of these intoxicating cannabinoids than are allowed in regulated cannabis products. In addition, these hemp-derived THC products are not required to adhere to any packaging standards that would prevent their marketing to minors.

For all these reasons, MDDCSAM respectfully urges this Committee to issue a favorable report on SB 214.

The Maryland-DC Society of Addiction Medicine

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<sup>1</sup> 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>

<sup>2</sup> Meehan-Atrash, J., & Rahman, I. (2022). Novel  $\Delta$ 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>