

SB 215 - MML - FAV.pdf

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Position: FAV



Maryland Municipal League
The Association of Maryland's Cities and Towns

TESTIMONY

January 30, 2025

Committee: Senate Finance Committee

Bill: SB 215 - Cannabis - On-Site Consumption Establishments and Cannabis Events

Position: Support

Reason for Position:

The Maryland Municipal League supports SB 215, which makes alterations to the operations of cannabis on-site consumption facilities and creates a process to establish a “cannabis event.” These businesses and events offer opportunities to boost economic development while maintaining local authority and generating additional tax revenue. While the bill touches on many aspects of on-site consumption facilities and cannabis events, we will focus on the provisions that are most impactful to municipal governments.

Municipalities are often the economic, social, cultural, and population hubs of their region. Many cities host festivals, parades, and events that bring the community closer together while drawing visitors from out of town. This new industry provides additional opportunities to bring people together while highlighting all municipalities have to offer. The way the bill is constructed, local governments retain the local authority to determine whether these facilities or events are the right fit for their jurisdiction.

Under current law, on-site consumption facilities are authorized to operate in the State after obtaining a license from the Maryland Cannabis Administration (MCA). Local governments already have the authority to regulate the zoning of these establishments, limit smoking on the premises, and prohibit their operation within the jurisdiction; this bill adds additional local authority to restrict operating hours.

“Cannabis event” is a new term that would allow for consumption of cannabis products on the premises of an event after acquiring a permit from MCA. The proposed framework around the permit and execution of these events provides significant local authority while also offering additional sales tax revenue.



Maryland Municipal League
The Association of Maryland's Cities and Towns

For these reasons, the Maryland Municipal League respectfully requests a favorable report on Senate Bill 215. For more information, please contact Bill Jorch, Director, Public Policy and Research at billj@mdmunicipal.org. Thank you for your consideration.

The Maryland Municipal League uses its collective voice to advocate, empower and protect the interests of our 160 local governments members and elevates local leadership, delivers impactful solutions for our communities, and builds an inclusive culture for the 2 million Marylanders we serve.

47 State Circle, Suite 403 Annapolis, Maryland 21401
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OSE sb215, On-site consumption testimony.pdf

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Position: FAV



January 28, 2025

Honorable Chair Senator Pamela Beidle
MGA Senate Finance Committee
3 East Miller Senate Office Building
Annapolis, Maryland 21401

Testimony in Support of Senate Bill 215

Chair Beidle, Vice Chair Hayes, and distinguished members of the Senate Finance Committee:

The Office of Social Equity respectfully submits this testimony in *support* of Senate Bill 215 – *Cannabis - On-Site Consumption Establishments and Cannabis Events*.

The Office of Social Equity was established in 2023 through the Cannabis Reform Act following a vote by Marylanders to legalize cannabis for adult use. The Office is charged with providing resources and support for historically disadvantaged individuals and businesses seeking to enter the adult-use cannabis market. This bill creates another avenue for advancing those goals by reserving for social equity licensees the first opportunity to apply for on-site consumption and event licenses.

Senate Bill 215 supports economic growth, public health, and equity in several ways. By formalizing cannabis event registration and on-site consumption establishments, the bill provides a clear and regulated pathway for legacy event planners to enter the licensed market.

Restricting on-site consumption establishments to edible cannabis products aligns with public health objectives by reducing concerns related to secondhand smoke or vapor. However, it falls short in support of the needs of Marylanders who require a safe and most importantly, legal place to smoke cannabis. Smoking cannabis flower is the most common consumption method for Maryland adults and our office is committed to addressing this policy gap in the near future.

This bill also respects the authority of local jurisdictions to opt-in to on-site while adopting zoning requirements and set hours of operation, ensuring communities can manage these establishments in ways that align with their values and priorities. Balancing these factors will help foster public confidence in the regulated cannabis market and encourage responsible consumption practices and reduce the stigma often associated with the plant.

By reserving on-site consumption licenses for social equity licensees, the state continues to prioritize addressing historical injustices and creating opportunities for individuals and communities disproportionately impacted by cannabis prohibition. More specifically, this bill



would help social equity licensees gain market share in edibles, including cannabis beverages. According to a report by Grand View Research, the global market for cannabis beverages is projected to grow at a compound annual growth rate of 17.8% from 2021 to 2028, fueled by growing consumer curiosity and acceptance of cannabis-infused products. Our office looks forward to supporting social equity licensees as they work with the Cannabis Public Health Advisory Council to ensure that consumers are provided with consumption education that is clear, consistent, and relevant to their lifestyles.

Although there are currently 12 states with varying on-site consumption models, Maryland plans to lead the way. This bill provides a solid foundation and I encourage the Committee to continue working closely with stakeholders to refine these provisions as the industry evolves. We look forward to working with the Maryland Cannabis Administration, legislators, and other stakeholders to develop an on-site consumption model that sets the standard for the rest of the country. Specifically, consideration should be given to expanding accessibility for small businesses and streamlining application processes to ensure participation from legacy event planners.

This bill is necessary to continue to strengthen the bold vision of economic opportunity and equity established by the Cannabis Reform Act. We thank you for your time and consideration of this bill. I hope this information is useful. If you would like to discuss this further, please contact me at (443) 610-1666 or audrey.johnson1@maryland.gov or Courtney Davis, Deputy Director at (443) 610-1730 or courtney.davis@maryland.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Audrey Johnson". The signature is written in a cursive, flowing style.

Audrey Johnson
Executive Director, Office of Social Equity

Carrington 2025 Testimony SB215 on site consumptio

Uploaded by: Darrell Carrington

Position: FAV



CARRINGTON & ASSOCIATES, LLC

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Testimony in Support of Senate Bill 215 Cannabis – On-Site Consumption Establishments and Cannabis Events

Thank you for the opportunity to provide testimony in support of Senate Bill 215, which introduces critical provisions regarding on-site consumption establishments and cannabis events in Maryland. As a business that has been actively engaged in the cannabis industry since 2013, Carrington & Associates, LLC recognizes the significant potential of this bill to enhance the state's cannabis market while addressing public health and safety concerns.

Senate Bill 215 takes a progressive approach to cannabis regulation by introducing clear guidelines for on-site consumption and cannabis events, areas that have long been recognized as essential to the growth of the industry. This bill would enable businesses, including those operated by social equity applicants, to offer cannabis products for consumption on-site in a controlled and responsible environment. It includes provisions that ensure consumer safety through responsible vendor training, educational materials, and clear boundaries on what can and cannot occur within these establishments.

Of particular note is the bill's authorization of on-site consumption establishments to repack and process cannabis products for the creation of single-serving items. This is a necessary step toward enhancing consumer experience and facilitating access to appropriately portioned cannabis products, which aligns with responsible consumption practices and regulatory standards in place throughout the state.

Additionally, Senate Bill 215 provides a balanced approach by allowing local jurisdictions the flexibility to establish hours of operation and zoning regulations for these establishments, ensuring that local communities maintain control over how cannabis-related businesses are integrated into their neighborhoods. This is crucial in promoting collaboration between the state and local authorities to ensure the smooth implementation of these businesses.

For the cannabis industry, this bill presents an opportunity to innovate and expand by creating new venues where consumers can experience cannabis in a responsible and enjoyable manner, while providing businesses with a pathway to diversify their operations. Importantly, the bill's focus on social equity applicants ensures that individuals from historically disadvantaged communities have an opportunity to participate in this burgeoning sector.

Carrington & Associates, LLC strongly supports Senate Bill 215 as an important step in Maryland's cannabis evolution. We believe that by providing clear guidelines for on-site consumption and cannabis events, this bill fosters the responsible and legal use of cannabis, supports the growth of the industry, and provides a platform for social equity applicants to succeed. We urge the Committee to pass this bill and look forward to the continued growth and innovation of the cannabis sector in Maryland.

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FWA - SB0215 - MCA - Written.pdf

Uploaded by: Andrew Garrison

Position: FWA



January 30th, 2025

The Honorable Pamela Beidle
Chair, Senate Finance Committee
3E Miller Senate Office Building
11 Bladen Street
Annapolis, MD 21401

Senate Bill 215 – Cannabis - On-Site Consumption Establishments and Cannabis Events
FAVORABLE WITH AMENDMENTS

Dear Chair Beidle, Vice Chair Hayes, and Members of the Senate Finance Committee:

The Maryland Cannabis Administration (MCA) supports Senate Bill 215 – Cannabis - On-Site Consumption Establishments and Cannabis Events (SB0215) and respectfully requests a favorable report, with one technical amendment.

SB0215 is an MCA departmental proposal and makes necessary amendments and clarifications to the current provisions pertaining to on-site consumption establishments. MCA is authorized to award on-site consumption licenses in the second round of licensure and believes the current statutory provisions do not provide a consistent or viable business model for these license types. In SB0215, MCA is proposing a new model of consumption establishments that rely on smoke-free consumption options and present what the MCA believes is an exciting opportunity for social equity applicants.

Additionally, SB0215 creates a pathway for event registration with the Administration for the purposes of hosting an event that may permit consumption or sell certain cannabis products to consumers. MCA believes that this registration is important to continue to regulate the State's cannabis industry, and presents opportunities for further market development for the new licensees.

Throughout this proposal, MCA worked to maintain levels of local control within each structure, allowing for jurisdictions to further regulate the consumption operations within their boundaries. MCA additionally includes provisions for ensuring public health and safety at registered events by expanding enforcement authority to all sworn law enforcement in the State.

SB0215 provides an innovative structure for on-site consumption establishment operations, in advance of their issuance in the second-round of licensing. It also establishes registration pathways for cannabis-friendly events. These measures promote new market opportunities for social equity licensees, while also ensuring safe and responsible cannabis sales by requiring compliance with MCA manufacturing, testing, packaging and labeling, and single-serving dispensing standards. Finally, they empower local governments by authorizing them to impose additional restrictions for licensees and events as appropriate for their jurisdictions.

MCA respectfully requests a technical amendment to clarify the intent regarding on-site consumption establishments ability to process cannabis products. The only processing ability the MCA wishes to grant to consumption licensees is for single-serving products, as defined. Striking “**CANNABIS OR CANNABIS-INFUSED PRODUCTS**” on page 4, in line 11 and replacing with “**SINGLE-SERVING PRODUCTS**” would clarify the MCA’s intent under this proposal.

The MCA is committed to working with the Senate Finance Committee on these license types and business models to ensure that public health and safety can be maintained while providing a path forward for further growth and development in the State’s cannabis industry.

If you would like to discuss this further, please contact me at andrew.garrison@maryland.gov, or Alison Butler Division Chief, Policy Implementation, at alison.butler@maryland.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew C. Garrison". The signature is fluid and cursive, with a horizontal line extending from the end.

Andrew C. Garrison
Chief of Policy & Government Affairs, Maryland Cannabis Administration

2025 SB 215 Onsite Consumption Event Licenses SWA.

Uploaded by: Ashlie Bagwell

Position: FWA



Senate Bill 215: Cannabis—On-Site Consumption Establishments and Cannabis Events

On behalf of the Maryland Dispensary Association (MDDA)
Senate Finance Committee
Support with Amendments
January 30, 2025

The Maryland Dispensary Association (MDDA), formerly the Maryland Medical Dispensary Association (MDMDA), was established in May, 2017 in order to promote the common interests and goals of the Medical Cannabis Dispensaries in Maryland. MDDA advocates for laws, regulations and public policies that foster a healthy, professional and secure medical cannabis industry in the State. MDDA works on the State and local level to advance the interest of licensed dispensaries as well as to provide a forum for the exchange of information in the Medical Cannabis Industry. We appreciate the opportunity to provide comments on Senate Bill 215.

Two years ago, the Maryland General Assembly passed legislation, setting up both a policy and taxing framework for cannabis for adult use. This bill focused on increasing diversity in the cannabis industry while at the same time setting up a taxing structure so as to greatly minimize the illicit market. We commend you for the work you did to create a successful cannabis program in Maryland, and we are proud to be your partners in that.

Senate Bill 215 seeks to make changes to the on-site consumption lounge licenses established in the legislation that passed two years ago. In addition, it seeks to create cannabis event licenses and vendor licenses related to those events. We respectfully request consideration of the following amendments:

Current law stipulates that dispensary licensees are prohibited from also owning an on-site consumption lounge license. We strongly believe dispensary licensees should be eligible to

apply for an onsite consumption lounge. Dispensaries are the retail face of the cannabis industry and, therefore, have experience with cannabis products. They have an understanding about how to safely store, handle and sell products and already have staff trained to recognize and handle intoxication and substance use disorders. It makes sense that on-site consumption lounges would be located in conjunction with dispensaries. Further, we believe on-site consumption lounges should not solely be limited to social equity applicants.

Additionally, Senate Bill 215 stipulates on-site consumption lounges can only sell edible and beverage products. We strongly urge the committee to allow for combustible products, too. Many people, especially renters, are not allowed to smoke or vape in their place of residence. On-site consumption lounges, then, provide for them a place to do that. This is important when you consider that a majority of the people who purchase cannabis from a cannabis dispensary currently are purchasing products for smoking or vaping.

We appreciate the creation of event licenses in this bill and understand that a lot of the details on how such a license will work, including the vendor licenses, would be established in regulations. Currently the bill allows for either a processor or a dispensary partnering with an establishment to sell edibles and beverages onsite at an event OR for an event location to purchase edibles and beverages from a processor and dispensary so that these products may be purchased directly from event staff. We are opposed to the latter arrangement and support the former. However, we believe dispensaries should be the only licensee category able to partner with an event location to sell products to the public. Once again, dispensaries are the retail face of the cannabis industry and, therefore, have experience with cannabis products. They have an understanding about how to safely store, handle and sell products and already have staff trained to recognize and handle intoxication and substance use disorders.

We appreciate the opportunity to provide comments on Senate Bill 215. Thank you for your support of the cannabis industry. We urge a favorable report on Senate Bill 215 with the amendments included in this testimony.

2025.01.28 - NCF Letter to Senate Finance Committe

Uploaded by: Caroline Phillips

Position: FWA



January 28, 2025

Chairperson Pamela Beidle

Maryland Senate Finance Committee
3 East Miller Senate Office Building
Annapolis, MD 21401

Vice Chair Antonio Hayes

Maryland Senate Finance Committee
3 East Miller Senate Office Building
Annapolis, MD 21401

cc: all members of the Maryland Senate Finance Committee

Re: SB0215 - On-Site Consumption Establishments and Cannabis Events

Dear Chairperson Beidle, Vice Chair Hayes, and members of the Maryland Senate Finance Committee:

My name is Caroline Phillips and I am the Founder and Executive Producer of the National Cannabis Policy Summit and Festival (NCF). NCF is the nation's largest annual ticketed cannabis event. Taking place annually since 2016, NCF has hosted nearly 150,000 attendees – including more than 55,000 Maryland residents – for a week of dynamic programs capped by a 2-day music and advocacy festival in Washington, D.C. I am penning this letter alongside Queen Adesuyi, a long-time cannabis justice advocate and partner at Reframe Health and Justice.

We write to express excitement about SB 0215, a bill that would authorize and regulate on-site cannabis consumption at certain establishments and cannabis events. This effort presents an opportunity for the state of Maryland to regulate on-site cannabis consumption and sales in a way that maximizes the benefits of cannabis regulation through harm reduction, consumer safety, and social equity measures. **As currently drafted, SB0215 is a step forward in the right direction. However, we have two critical recommendations that would significantly improve the bill's impact across public health, harm reduction, and economic opportunities – especially for Black small businesses and social equity licensees.** We have outlined these recommendations below.

Background: Throughout 2024, we have worked to develop a [proposal](#) for a “[Maryland Small Business and Social Equity Outdoor Live Events Retail Sales Program](#),” in consultation with the Equity Trade Network. This [proposed program](#) is informed by 18 years of our collective experience hosting large-scale cannabis events and advancing evidence-based cannabis policy and harm reduction efforts. Our proposed harm reduction-focused, regulated, outdoor live events cannabis retail sales program is designed to benefit social equity licensees, offering a lucrative lifeline to historically disadvantaged entrepreneurs. In addition to the economic benefits of this proposed program, regulating sales and consumption of cannabis at outdoor, live events would reduce harm by making tested and regulated cannabis products accessible in venues where unregulated products, and sales, would otherwise be present. Our proposed program offers three robust, harm reduction-focused models for controlled consumption of cannabis, designed with all qualifying

event attendees – cannabis consuming or not – in mind. You can find more information and details on our proposed program [here](#).

With that, our recommendations for SB 0125 are focused on the bill’s sections related to on-site consumption and sales of cannabis products at cannabis events:

Recommendation #1: There is a harm reduction and consumer safety gap left by only regulating cannabis beverages and edibles at cannabis events. Authorize consumption and sale of inhalable cannabis, such as cannabis flower and concentrate, at qualifying outdoor cannabis events.

Only regulating the consumption and sale of drinkable and edible cannabis products at cannabis events – while banning the consumption and sale of inhalable cannabis products – leaves a vast harm reduction and consumer safety gap that undermines the benefits of cannabis regulation. Smoking cannabis flower is the most common method of consumption for Maryland adults.¹ This includes Maryland’s medical cannabis patients, many of whom consume daily (or almost daily) to treat various chronic conditions, from chronic pain and PTSD to epileptic seizures.² According to sales data from the Maryland Cannabis Administration, cannabis flower sales make up 60% of all cannabis products sold, while concentrates (vapes) and edibles represent 28% and 12% of retail sales, respectively.³ **Carving out cannabis flower and concentrates from authorized consumption and sales at cannabis events leaves the door open to unregulated sales of untested products, which undercuts the consumer safety benefits of comprehensive cannabis regulatory policies.** Conversely, more comprehensively regulating cannabis products at cannabis events, including cannabis flower and concentrates, allows for limitations on product potency, product type and number of product purchases per consumer. Omitting cannabis flower and concentrates from outdoor live event regulations will not make the presence of these products disappear, as unregulated use is already prevalent at venues.⁴

We recognize that not all events desire or need a cannabis presence. We recommend that guidelines be established for venues and live event operators that offer clear criteria for when and where cannabis sales are allowed/appropriate, along with when/where/how consumption is permitted. Our previously mentioned proposed program encompasses [three different harm reduction-focused sales models](#) that ensure cannabis sales and consumption are controlled in a way that prioritizes the health and experience of guests, amplifies Maryland’s licensed social equity brands, and drives revenue back to the State. The harm reduction-focused sales models include (1) the *Open Sales and Consumption Model*, (2) the *Designated Retail and Controlled Smoking Area Model*, and (3) the *Drinks and Edibles-Only Bar Program*. Developing comprehensive, controlled

¹ Maryland Medical Cannabis Commission, “Maryland Cannabis Use Baseline Study.”

² Ibid.

³ Maryland Cannabis Administration, MCA Medical and Adult-Use Cannabis Data Dashboard.

<https://cannabis.maryland.gov/Pages/Data-Dashboard.aspx>

⁴ Drug Policy Alliance, Safer Supply Toolkit, December 2, 2024. <https://drugpolicy.org/resource/safer-supply-toolkit/>

consumption models for qualifying events that opt-in to including a cannabis presence can create a healthier and more enjoyable environment for *all* guests.

We strongly recommend authorizing the consumption and sale of inhalable cannabis at qualifying outdoor cannabis events. Outdoor events do not have the same intensive infrastructure requirements necessary to reduce the harm of smoking due to natural, unlimited ventilation outdoors.⁵ To manage air quality and learn more about the impacts of outdoor consumption of cannabis flower and vapes, we recommend that venues interested in hosting cannabis events that may include inhalable cannabis products and consumption engage an air quality professional from a third-party company to develop and implement an Odor Control Plan and conduct continuous air quality monitoring.⁶ Air quality monitoring is not only a way to ensure healthier spaces, but it also allows us to gather valuable data to inform future policy and assure host communities have transparency around activities in event spaces in their neighborhoods.⁷

Recommendation #2: Social equity licensees represent cannabis entrepreneurs and businesses most impacted by the inequitable enforcement of cannabis law violations under prohibition. Establish a lucrative, sustainable lifeline for social equity and small businesses by limiting vendor permits to social equity applicants indefinitely.

As currently drafted, this bill limits vendor permits that authorize a holder to sell single-serving products at cannabis events to social equity licensees until July 1, 2028. We applaud the intention behind this restriction as it is a creative way to offer lucrative opportunities that benefit social equity licensees at *no cost to the state*. Throughout the cannabis industry, social equity licensees are small businesses, single locations, and brick-and-mortar store owners. In Maryland, to qualify as a social equity applicant and licensee, 65% of a business' ownership must be held by one or more individuals who have either:

1. lived in a disproportionately impacted area, which is defined as a geographic area that had above 150% of the State's 10-year average for cannabis possession charges;
2. attended a public school in a disproportionately impacted area for at least 5 years; or

⁵ Jiyeon Yang, Shervin Hashemi, et al. "Risk assessment and estimation of controlling safe distance for exposure to particulate matter from outdoor secondhand tobacco smoke," *Air Qual Atmos Health* 17, 139–154 (2024). <https://doi.org/10.1007/s11869-023-01435-9>; "Is outdoor exposure to secondhand smoke/aerosol comparable to indoors?," *U.S. Environmental Protection Agency*. <https://www.epa.gov/indoor-air-quality-iaq/outdoor-exposure-secondhand-smokeaerosol-comparable-indoors>; "Harm Reduction Services for Anyone who Smokes or Inhales Drugs," *Public Health Ontario*, July 2023, https://www.publichealthontario.ca/-/media/Documents/H/2023/harm-reduction-services-smoking-inhaling-drugs.pdf?r=255f0227310e46448c8c30ace7b6ef02&sc_lang=en

⁶ Paul Schafer and Pat Sullivan, "Odor Monitoring and Control," <https://www.scsengineers.com/services/clean-air-act-services/odor-monitoring-and-control/>

⁷ "What is air quality monitoring and why is it important?," *Clarity*, March 21, 2023. <https://www.clarity.io/blog/what-is-air-quality-monitoring-why-is-it-important>

3. attended a Maryland four-year institution of higher education where at least 40% of the individuals who attended the institution received a Pell Grant.⁸

Not only are social equity licensees subject to the tax burdens and other associated costs of being a cannabis business owner, but they are regularly fighting for brand awareness against larger operators with substantial budgets for marketing, access, and community outreach. **We recommend that the State indefinitely limit access to vendor permits in the spirit of ensuring a lucrative, economic benefit to social equity entrepreneurs and small businesses.**

In addition to consumer safety issues, carving out cannabis flower and concentrates from this initiative will significantly impact the economic opportunities that social equity licensees stand to gain. As previously noted, cannabis flower and concentrates (vapes) account for 88% of cannabis product sales in Maryland.⁹ Only including edible and drinkable cannabis products encourages a direct-to-venue concessions model, significantly undercutting the economic benefits to small business and social equity retailers. This carve-out ignores the evidenced consumer demand amongst Maryland adults, and will have unintended consequences for Maryland’s medical cannabis patients who rely on cannabis flower and/or concentrates for medicinal purposes. **A robust, outdoor live events retail sales program is a vehicle to redirect adult consumers and patients from unregulated markets, sending millions of dollars in annual revenue into the regulated markets and the State.** It also provides qualifying venues a way to meet changing consumer trends while prioritizing harm reduction and consumer safety.

To sum up, we applaud current efforts to expand how cannabis is regulated for adult use in Maryland. We believe that this legislative initiative by the MCA is needed, and opens up the door to actualizing the true public health, harm reduction, and economic opportunities of cannabis regulation. According to projections by industry experts, Maryland’s cannabis industry will generate \$1.1B in revenue and \$100M in sales tax in 2025 via licensed cannabis retail storefronts.¹⁰ However, social equity licensees and small business owners continue to disproportionately struggle to generate the capital to open doors and create sustainable business models.¹¹ An outdoor events cannabis sales program benefitting only small business and social equity entrepreneurs is a vehicle to help shrink the unregulated sales market, and a way for

⁸ Maryland Office of Social Equity, “Licensing & Eligibility,” <https://ose.maryland.gov/Pages/licensing-and-eligibility.aspx>

⁹ Maryland Cannabis Administration, MCA Medical and Adult-Use Cannabis Data Dashboard.

¹⁰ Point 7 Group, “The History of Cannabis in Maryland,” <https://pointsevengroup.com/post/history-of-cannabis-in-maryland/>

¹¹ Point 7 Group, “The History of Cannabis in Maryland.”; Rosalind Adams, “Marijuana Entrepreneur Who Was Once Face Of New York’s Social Equity Loan Fund Now Fears Foreclosure,” *Marijuana Moment*. November 30, 2024. <https://www.marijuanamoment.net/marijuana-entrepreneur-who-was-once-face-of-new-yorks-social-equity-loan-fund-now-fears-foreclosure/>; Benjamin Adams, “Only 27% Of U.S. Cannabis Businesses Are Profitable, Survey Shows,” *Forbes*, July 26, 2024. <https://www.forbes.com/sites/benjaminadams/2024/07/26/only-27-of-us-cannabis-businesses-are-profitable-survey-shows/>; Chris Casacchia, “Progress not happening fast enough for marijuana social equity entrepreneurs,” November 14, 2023, <https://mjbizdaily.com/progress-not-happening-fast-enough-for-cannabis-social-equity-entrepreneurs/>

qualifying venues to meet changing consumer needs while prioritizing harm reduction and consumer safety. Moreover, this proposed program would provide a fruitful and sustainable economic lifeline to historically disadvantaged cannabis entrepreneurs who bore the brunt of cannabis prohibition.

We would appreciate you taking our recommendations into consideration. We welcome the opportunity to discuss our proposed program and recommendations further. Please feel free to contact us with any questions or concerns by reaching out to caroline@nationalcannabisfestival.com and queen@reframehealthandjustice.com.

Thank you for your consideration and time.

Sincerely,



Caroline Phillips

Founder

National Cannabis Festival



Queen Adesuyi

Partner

Reframe Health and Justice

SB 215_CANMD_FWA_FIN.pdf

Uploaded by: Joe Bryce

Position: FWA



**Senate Bill 215 - Cannabis – On-Site Consumption Establishments
and Cannabis Events
Senate Finance Committee
January 30, 2025**

Thank you for the opportunity to express the concerns of the Maryland Wholesale Cannabis Trade Association (CANMD) regarding Senate Bill 215 – *Cannabis – On-Site Consumption Establishments and Cannabis Events*. CANMD represents a majority of the cannabis processor and grower licensees in Maryland and has worked with the General Assembly to ensure a well-regulated cannabis market.

Senate Bill 215 provides further structure to the on-site consumption license category created in the Cannabis Reform Act of 2023. It also establishes new policy on cannabis events.

CANMD does not oppose the creation of on-site consumption establishments. In fact, consumption lounges can perform a valuable function for people who, for various reasons, cannot consume cannabis where they live. However, Senate Bill 215 goes further and grants a processor license to an on-site consumption licensee. Many of the recent processor license awardees are not yet operational and the second round of licenses outlined in the 2023 legislation has not occurred. Sufficient processor licenses were created in the Cannabis Reform Act, and the receipt of an on-site consumption license should not provide a shortcut to a processor license.

CANMD also supports the creation of a cannabis event license. CANMD members welcome the opportunity to participate in these events and believe all licensees should be allowed to obtain a vendor permit. If the Committee intends to pass a bill, it may be necessary to identify what types of events are anticipated and carefully review the bill to make sure those events could be held under the provisions of SB 215. For example, the language regarding what “premises” means when distinguishing between alcohol permitted and non-permitted areas is not clear. Additionally, the fee for a vendor permit is too high to encourage licensees to participate in an event that is temporary.

CANMD appreciates the work this committee has done to ensure that Marylanders can safely and responsibly consume cannabis and cannabis products. We look forward to working with the Committee as it considers Senate Bill 215.

Christina B. Johnson
Chair, Maryland Wholesale Cannabis Trade Association

SB0215-FIN_MACo_SWA.pdf

Uploaded by: Karrington Anderson

Position: FWA



Senate Bill 215

Cannabis - On-Site Consumption Establishments and Cannabis Events

MACo Position: **SUPPORT**

To: Finance Committee

WITH AMENDMENTS

Date: January 30, 2025

From: Karrington Anderson

The Maryland Association of Counties (MACo) **SUPPORTS SB 215 WITH AMENDMENTS**. This bill allows the holder of a cannabis event registration to host certain cannabis events and authorizes counties to assess fees, authorize events, or restrict them within their jurisdictions. MACo respectfully requests modest clarifying amendments to preserve local authority and ensure effective oversight.

Specifically, the legislation should explicitly state that any cannabis event authorized by the Maryland Cannabis Administration (MCA) must also comply with all applicable local permits and approvals. This safeguard will uphold counties' ability to regulate events and ensure they align with community standards. Additionally, the bill should clarify that licensed cannabis events must adhere to any locally established restrictions or regulations, empowering counties to tailor rules based on specific needs and priorities.

MACo is grateful for the opportunity to work collaboratively with MCA to refine the proposed amendments, listed on the next page. MCA has expressed agreement that the changes align with the intent of the bill and provide needed clarity. These adjustments will help ensure cannabis events are responsibly managed while avoiding unnecessary burdens on local governments.

MACo's amendments provide important flexibility to address local community needs while ensuring the success of cannabis events. Counties remain committed to fostering responsible cannabis use and supporting economic opportunities, while safeguarding public health and safety.

For these reasons, MACo urges the Committee to give SB 215 a **FAVORABLE WITH AMENDMENTS** report.

MACo Amendments on SB 215:

- Page 4, line 22, after “GENERAL ARTICLE” insert
“IN ORDER TO OPERATE AS A FOOD SERVICE FACILITY, THE ON-SITE CONSUMPTION ESTABLISHMENT MUST OBTAIN ALL LOCAL COUNTY APPROVALS FOR A FOOD SERVICE FACILITY, INCLUDING BUT NOT LIMITED TO, ALL NECESSARY BUILDING CODE PERMITS, MECHANICAL CODE PERMITS, AND ALL OTHER APPLICABLE PERMITS, AS WELL AS A USE AND OCCUPANCY CERTIFICATE AND APPROPRIATE LICENSES.”
- Page 10, line 4, strike “SUBJECT TO” through “SUBTITLE,”
- Page 10, line 8, after “(2)” insert **“REQUIRE THE EVENT REGISTRANT TO OBTAIN APPROVAL OR A PERMIT FOR THE EVENT; OR”**
- Page 10, line 8, insert “**(3)**” before “ASSESS AN”

Bill 215 Testimony.pdf

Uploaded by: Maxwell LePage

Position: FWA

Good afternoon.

I am concerned and confused about the on-site consumption bill.

To be clear, I do not oppose on-site consumption of cannabis, in fact, it is quite the opposite. I believe that there should absolutely be places where it is legal and safe for people to consume cannabis, especially when landlords can still prohibit cannabis consumption in rented units. Medical patients and even recreational consumers deserve to be able to use cannabis without fear of retaliation.

However, I do not think it makes any sense to only allow edibles or beverages at these locations.

For one, edibles can be consumed discretely anywhere. It may not be strictly legal, but almost no one will notice if someone eats a small gummy in a movie theatre, for example. Many people already do this. Specific locations set aside to allow consumption of edibles alone will simply be underutilized, as it is not filling a need.

Furthermore, edibles often take up to an hour, or even more, to take effect. This is not like drinking alcohol. Providing a location for people to consume edibles on site does not concentrate inebriation to that site. At a bar, most people will be the most drunk while they are at the bar and drinking. By the time they leave, they will have stopped drinking and are beginning to sober up. This is simply not how cannabis edibles work. I imagine that many people would simply consume their product and then leave, with the full effects only taking place once they are at a different location. What is the difference between doing that at a dedicated business and doing that in your own home, or on the bus, or literally anywhere else?

I think that this bill vastly misses the mark by not providing locations for people to smoke and vape cannabis as well. This, rather than edible consumption, is the form of use that I think actually warrants these dedicated locations. Unlike edible consumption, smoking and vaping does impact bystanders. With the absence of dedicated on-site consumption for smoking and vaping, consumers have no choice but to consume at their own home, or illegally in public. If someone rents, and fears losing their housing by smoking or vaping at home; if someone has a child, or lives with someone who is sensitive to the smell of cannabis, or allergic; they will simply smoke and vape illegally in public, because they have no other option. Why should we not provide a dedicated place where consumers can smoke and vape, safely and legally, and away from any bystanders who do not wish to be affected?

You never hear anyone complaining about someone eating a gummy or a chocolate bar near them. You do hear about people complaining of the smell of cannabis smoke, very regularly. It seems extremely clear to me that it is smoking and vaping which needs the dedicated spaces, not edible consumption. Edibles could of course be allowed at those locations as well, but I see that as secondary to the main need.

Hookah lounges exist legally in the state of Maryland. I see no reason why lounges for smoking and vaping cannabis should not as well. It seems backwards to me to focus on edible lounges first. When these businesses are inevitably underutilized, I fear that it would be used as "evidence" that onsite consumption in general is a bad idea or a non-viable business model. I hope that my

testimony provides reasons otherwise. In short, I believe that Bill 215 should be amended to include smoking and vaping in addition to edibles and beverages.

Thank you.

2025.01.28 - NCF Letter to Senate Finance Committe

Uploaded by: Queen Adesuyi

Position: FWA



January 28, 2025

Chairperson Pamela Beidle

Maryland Senate Finance Committee
3 East Miller Senate Office Building
Annapolis, MD 21401

Vice Chair Antonio Hayes

Maryland Senate Finance Committee
3 East Miller Senate Office Building
Annapolis, MD 21401

cc: all members of the Maryland Senate Finance Committee

Re: SB0215 - On-Site Consumption Establishments and Cannabis Events

Dear Chairperson Beidle, Vice Chair Hayes, and members of the Maryland Senate Finance Committee:

My name is Caroline Phillips and I am the Founder and Executive Producer of the National Cannabis Policy Summit and Festival (NCF). NCF is the nation's largest annual ticketed cannabis event. Taking place annually since 2016, NCF has hosted nearly 150,000 attendees – including more than 55,000 Maryland residents – for a week of dynamic programs capped by a 2-day music and advocacy festival in Washington, D.C. I am penning this letter alongside Queen Adesuyi, a long-time cannabis justice advocate and partner at Reframe Health and Justice.

We write to express excitement about SB 0215, a bill that would authorize and regulate on-site cannabis consumption at certain establishments and cannabis events. This effort presents an opportunity for the state of Maryland to regulate on-site cannabis consumption and sales in a way that maximizes the benefits of cannabis regulation through harm reduction, consumer safety, and social equity measures. **As currently drafted, SB0215 is a step forward in the right direction. However, we have two critical recommendations that would significantly improve the bill's impact across public health, harm reduction, and economic opportunities – especially for Black small businesses and social equity licensees.** We have outlined these recommendations below.

Background: Throughout 2024, we have worked to develop a [proposal](#) for a “[Maryland Small Business and Social Equity Outdoor Live Events Retail Sales Program](#),” in consultation with the Equity Trade Network. This [proposed program](#) is informed by 18 years of our collective experience hosting large-scale cannabis events and advancing evidence-based cannabis policy and harm reduction efforts. Our proposed harm reduction-focused, regulated, outdoor live events cannabis retail sales program is designed to benefit social equity licensees, offering a lucrative lifeline to historically disadvantaged entrepreneurs. In addition to the economic benefits of this proposed program, regulating sales and consumption of cannabis at outdoor, live events would reduce harm by making tested and regulated cannabis products accessible in venues where unregulated products, and sales, would otherwise be present. Our proposed program offers three robust, harm reduction-focused models for controlled consumption of cannabis, designed with all qualifying

event attendees – cannabis consuming or not – in mind. You can find more information and details on our proposed program [here](#).

With that, our recommendations for SB 0125 are focused on the bill’s sections related to on-site consumption and sales of cannabis products at cannabis events:

Recommendation #1: There is a harm reduction and consumer safety gap left by only regulating cannabis beverages and edibles at cannabis events. Authorize consumption and sale of inhalable cannabis, such as cannabis flower and concentrate, at qualifying outdoor cannabis events.

Only regulating the consumption and sale of drinkable and edible cannabis products at cannabis events – while banning the consumption and sale of inhalable cannabis products – leaves a vast harm reduction and consumer safety gap that undermines the benefits of cannabis regulation. Smoking cannabis flower is the most common method of consumption for Maryland adults.¹ This includes Maryland’s medical cannabis patients, many of whom consume daily (or almost daily) to treat various chronic conditions, from chronic pain and PTSD to epileptic seizures.² According to sales data from the Maryland Cannabis Administration, cannabis flower sales make up 60% of all cannabis products sold, while concentrates (vapes) and edibles represent 28% and 12% of retail sales, respectively.³ **Carving out cannabis flower and concentrates from authorized consumption and sales at cannabis events leaves the door open to unregulated sales of untested products, which undercuts the consumer safety benefits of comprehensive cannabis regulatory policies.** Conversely, more comprehensively regulating cannabis products at cannabis events, including cannabis flower and concentrates, allows for limitations on product potency, product type and number of product purchases per consumer. Omitting cannabis flower and concentrates from outdoor live event regulations will not make the presence of these products disappear, as unregulated use is already prevalent at venues.⁴

We recognize that not all events desire or need a cannabis presence. We recommend that guidelines be established for venues and live event operators that offer clear criteria for when and where cannabis sales are allowed/appropriate, along with when/where/how consumption is permitted. Our previously mentioned proposed program encompasses [three different harm reduction-focused sales models](#) that ensure cannabis sales and consumption are controlled in a way that prioritizes the health and experience of guests, amplifies Maryland’s licensed social equity brands, and drives revenue back to the State. The harm reduction-focused sales models include (1) the *Open Sales and Consumption Model*, (2) the *Designated Retail and Controlled Smoking Area Model*, and (3) the *Drinks and Edibles-Only Bar Program*. Developing comprehensive, controlled

¹ Maryland Medical Cannabis Commission, “Maryland Cannabis Use Baseline Study.”

² Ibid.

³ Maryland Cannabis Administration, MCA Medical and Adult-Use Cannabis Data Dashboard.

<https://cannabis.maryland.gov/Pages/Data-Dashboard.aspx>

⁴ Drug Policy Alliance, Safer Supply Toolkit, December 2, 2024. <https://drugpolicy.org/resource/safer-supply-toolkit/>

consumption models for qualifying events that opt-in to including a cannabis presence can create a healthier and more enjoyable environment for *all* guests.

We strongly recommend authorizing the consumption and sale of inhalable cannabis at qualifying outdoor cannabis events. Outdoor events do not have the same intensive infrastructure requirements necessary to reduce the harm of smoking due to natural, unlimited ventilation outdoors.⁵ To manage air quality and learn more about the impacts of outdoor consumption of cannabis flower and vapes, we recommend that venues interested in hosting cannabis events that may include inhalable cannabis products and consumption engage an air quality professional from a third-party company to develop and implement an Odor Control Plan and conduct continuous air quality monitoring.⁶ Air quality monitoring is not only a way to ensure healthier spaces, but it also allows us to gather valuable data to inform future policy and assure host communities have transparency around activities in event spaces in their neighborhoods.⁷

Recommendation #2: Social equity licensees represent cannabis entrepreneurs and businesses most impacted by the inequitable enforcement of cannabis law violations under prohibition. Establish a lucrative, sustainable lifeline for social equity and small businesses by limiting vendor permits to social equity applicants indefinitely.

As currently drafted, this bill limits vendor permits that authorize a holder to sell single-serving products at cannabis events to social equity licensees until July 1, 2028. We applaud the intention behind this restriction as it is a creative way to offer lucrative opportunities that benefit social equity licensees at *no cost to the state*. Throughout the cannabis industry, social equity licensees are small businesses, single locations, and brick-and-mortar store owners. In Maryland, to qualify as a social equity applicant and licensee, 65% of a business' ownership must be held by one or more individuals who have either:

1. lived in a disproportionately impacted area, which is defined as a geographic area that had above 150% of the State's 10-year average for cannabis possession charges;
2. attended a public school in a disproportionately impacted area for at least 5 years; or

⁵ Jiyeon Yang, Shervin Hashemi, et al. "Risk assessment and estimation of controlling safe distance for exposure to particulate matter from outdoor secondhand tobacco smoke," *Air Qual Atmos Health* 17, 139–154 (2024). <https://doi.org/10.1007/s11869-023-01435-9>; "Is outdoor exposure to secondhand smoke/aerosol comparable to indoors?," *U.S. Environmental Protection Agency*. <https://www.epa.gov/indoor-air-quality-iaq/outdoor-exposure-secondhand-smokeaerosol-comparable-indoors>; "Harm Reduction Services for Anyone who Smokes or Inhales Drugs," *Public Health Ontario*, July 2023, https://www.publichealthontario.ca/-/media/Documents/H/2023/harm-reduction-services-smoking-inhaling-drugs.pdf?rev=255f0227310e46448c8c30ace7b6ef02&sc_lang=en

⁶ Paul Schafer and Pat Sullivan, "Odor Monitoring and Control," <https://www.scsengineers.com/services/clean-air-act-services/odor-monitoring-and-control/>

⁷ "What is air quality monitoring and why is it important?," *Clarity*, March 21, 2023. <https://www.clarity.io/blog/what-is-air-quality-monitoring-why-is-it-important>

- attended a Maryland four-year institution of higher education where at least 40% of the individuals who attended the institution received a Pell Grant.⁸

Not only are social equity licensees subject to the tax burdens and other associated costs of being a cannabis business owner, but they are regularly fighting for brand awareness against larger operators with substantial budgets for marketing, access, and community outreach. **We recommend that the State indefinitely limit access to vendor permits in the spirit of ensuring a lucrative, economic benefit to social equity entrepreneurs and small businesses.**

In addition to consumer safety issues, carving out cannabis flower and concentrates from this initiative will significantly impact the economic opportunities that social equity licensees stand to gain. As previously noted, cannabis flower and concentrates (vapes) account for 88% of cannabis product sales in Maryland.⁹ Only including edible and drinkable cannabis products encourages a direct-to-venue concessions model, significantly undercutting the economic benefits to small business and social equity retailers. This carve-out ignores the evidenced consumer demand amongst Maryland adults, and will have unintended consequences for Maryland’s medical cannabis patients who rely on cannabis flower and/or concentrates for medicinal purposes. **A robust, outdoor live events retail sales program is a vehicle to redirect adult consumers and patients from unregulated markets, sending millions of dollars in annual revenue into the regulated markets and the State.** It also provides qualifying venues a way to meet changing consumer trends while prioritizing harm reduction and consumer safety.

To sum up, we applaud current efforts to expand how cannabis is regulated for adult use in Maryland. We believe that this legislative initiative by the MCA is needed, and opens up the door to actualizing the true public health, harm reduction, and economic opportunities of cannabis regulation. According to projections by industry experts, Maryland’s cannabis industry will generate \$1.1B in revenue and \$100M in sales tax in 2025 via licensed cannabis retail storefronts.¹⁰ However, social equity licensees and small business owners continue to disproportionately struggle to generate the capital to open doors and create sustainable business models.¹¹ An outdoor events cannabis sales program benefitting only small business and social equity entrepreneurs is a vehicle to help shrink the unregulated sales market, and a way for

⁸ Maryland Office of Social Equity, “Licensing & Eligibility,” <https://ose.maryland.gov/Pages/licensing-and-eligibility.aspx>

⁹ Maryland Cannabis Administration, MCA Medical and Adult-Use Cannabis Data Dashboard.

¹⁰ Point 7 Group, “The History of Cannabis in Maryland,” <https://pointsevengroup.com/post/history-of-cannabis-in-maryland/>

¹¹ Point 7 Group, “The History of Cannabis in Maryland.”; Rosalind Adams, “Marijuana Entrepreneur Who Was Once Face Of New York’s Social Equity Loan Fund Now Fears Foreclosure,” *Marijuana Moment*. November 30, 2024. <https://www.marijuanamoment.net/marijuana-entrepreneur-who-was-once-face-of-new-yorks-social-equity-loan-fund-now-fears-foreclosure/>; Benjamin Adams, “Only 27% Of U.S. Cannabis Businesses Are Profitable, Survey Shows,” *Forbes*, July 26, 2024. <https://www.forbes.com/sites/benjaminadams/2024/07/26/only-27-of-us-cannabis-businesses-are-profitable-survey-shows/>; Chris Casacchia, “Progress not happening fast enough for marijuana social equity entrepreneurs,” November 14, 2023, <https://mjbizdaily.com/progress-not-happening-fast-enough-for-cannabis-social-equity-entrepreneurs/>

qualifying venues to meet changing consumer needs while prioritizing harm reduction and consumer safety. Moreover, this proposed program would provide a fruitful and sustainable economic lifeline to historically disadvantaged cannabis entrepreneurs who bore the brunt of cannabis prohibition.

We would appreciate you taking our recommendations into consideration. We welcome the opportunity to discuss our proposed program and recommendations further. Please feel free to contact us with any questions or concerns by reaching out to caroline@nationalcannabisfestival.com and queen@reframehealthandjustice.com.

Thank you for your consideration and time.

Sincerely,



Caroline Phillips

Founder

National Cannabis Festival



Queen Adesuyi

Partner

Reframe Health and Justice

SB215_NCF_FWA

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Position: FWA

THE MARYLAND SMALL BUSINESS & SOCIAL EQUITY OUTDOOR LIVE EVENTS CANNABIS RETAIL SALES PROGRAM

A harm reduction-focused, regulated, outdoor live events cannabis sales program to benefit social equity and small business licensees.

PRESENTED BY

CAROLINE PHILLIPS, FOUNDER AND PRODUCER, NATIONAL CANNABIS FESTIVAL & **QUEEN ADESUYI**, PARTNER, REFRAME HEALTH AND JUSTICE

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OVERVIEW

According to projections by industry experts, Maryland's cannabis industry is expected to generate \$1.1B in revenue and \$100M in sales tax in 2025 via licensed cannabis retail storefronts, but social equity licensees and small business owners are still struggling to generate the capital to open doors and create sustainable business models.¹

Creating a harm reduction-focused, regulated, outdoor live events cannabis retail sales program to benefit social equity and small business licensees offers a lucrative lifeline to entrepreneurs as they get established, creates a broader economic impact in industries beyond cannabis, while also offering the opportunity to set controlled consumption rules with all event attendees - cannabis consuming or not - in mind.

In addition to benefits to the Maryland cannabis industry, regulating sales and consumption at live events:

- reduces harm by making tested and regulated products accessible in venues where unregulated products would otherwise be present²
- creates safer and more controlled environments for consumption
- creates new revenue streams for qualifying venues and promoters³
- generates additional sales tax and licensing fees for the State

A live events cannabis retail sales program benefitting small business and social equity licensees is a vehicle to redirect consumers from unregulated markets, sending millions of dollars in annual revenue into the burgeoning industry. The program also provides qualifying event venues a way to benefit and meet changing consumer trends while prioritizing harm reduction. When properly implemented, the program can generate significant revenue benefitting the cannabis industry and broader community at no cost to the State.⁴

PART 1: HEALTH & HARM REDUCTION

FACILITATING A SAFER AND HEALTHIER ENVIRONMENT WHERE CANNABIS IS SERVED

Why Provide Access to Regulated, Tested Cannabis Products?

The presence of cannabis at music and live events can be traced back through the history of American culture and with it, the presence of unregulated, untested products.⁵

Cannabis legalization allows states to facilitate safe access to regulated cannabis products for adults at permitted outdoor events, which eliminates concerns about contaminants, allows for potency standardizing, and allows for increased harm reduction and evidence-based drug education to consumers.⁶

Developing regulations around the sales and use of cannabis at live events creates a healthier and safer experience for all guests and redirects revenue from the unregulated market to the regulated market.⁷

How Do We Ensure Safe Sales and Service at Outdoor, Live Events?

Like TIPS certification for individuals serving alcohol, the Maryland Cannabis Awareness Training Program ensures all dispensers/budtenders of cannabis at outdoor, live events are trained to understand regulations and guidelines for creating a safer environment where cannabis is served and sold.⁸

The program includes courses on an array of topics, including:

- Understanding of cannabis products and consumption methods
- Potency and dosing
- Timing and metabolizing cannabis products
- Signs of intoxication
- Protocol for denying service
- Options for non-medical intervention
- How to gauge when medical intervention is necessary

How Can We Create Healthier Environments at Outdoor, Live Events for All Attendees While Also Allowing On-Site Consumption?

For many attendees at outdoor, live events, the smell of cannabis in the air is familiar – and perhaps not always welcome. Developing controlled consumption models for qualifying events that opt-in to include cannabis offerings can create a healthier and more enjoyable environment for all guests.⁹

Not all events desire or need a cannabis presence. Guidelines should be established for venues and live event operators that outline clear criteria for when and where cannabis retail sales are allowed/appropriate and when/where/how consumption is permitted.

Offering a variety of models (see below for “Harm Reduction-Focused Sales Models”) for venues and promoters to engage with the regulated cannabis industry ensures that cannabis sales and consumption is controlled in a way that prioritizes the health and experience of guests, amplifies Maryland’s licensed cannabis brands, and drives revenue back to the State.

HARM REDUCTION-FOCUSED SALES & CONSUMPTION MODELS

Product Definitions

In Maryland, **Flower products are defined as** buds of the cannabis plant sold in pre-packaged amounts or as pre-rolls.¹⁰

Concentrate products are defined as vape cartridges sold for adult-use.¹¹

Edibles products are defined as infused edible products intended for oral ingestions (includes capsules, drinks, etc.)¹²

MODEL 1: Open Sales and Consumption Model	
Event Access	Ticketed, Gated, 21+, state or private property
Retail Sales	Cannabis product retail sales available at designated licensed cannabis retailer locations across grounds
Cannabis Consumption	Attendees expect to be in an environment that includes cannabis (<i>e.g. cannabis-themed event</i>) Consumption of all types allowed across grounds
Approved Products for Sale and Consumption	Flower, Edibles, Drinks: <ul style="list-style-type: none">• Edibles limited to 10mg per package• Drinks limited to 5mg per 12oz beverage• Flower limited to pre-rolls (singles up to 4-packs)

MODEL 2: Designated Retail & Controlled Smoking Area Model

Event Access	Ticketed, Gated, 18+, state or private property
Retail Sales	<p>Cannabis products available in designated 21+ age-gated area</p> <ul style="list-style-type: none">• Must be fully fenced, set at least 400 feet from main concert viewing area with security re-checking IDs and looking for 21+ bands/stamps – only guests 21+ may enter this space• Cannabis product retail sales may only take place inside this space• Consumption of all cannabis products must stay within this area• Only guests 21+ may enter this space
Cannabis Consumption	<p>Designated, 21+, gated, consumption area</p> <ul style="list-style-type: none">• Consumption of all cannabis products must stay within this area• Only guests 21+ may enter this space
Approved Products for Sale and Consumption	<p>Flower, Edibles, Drinks:</p> <ul style="list-style-type: none">• Edibles limited to 10mg per package• Drinks limited to 5mg per 12oz beverage• Flower limited to pre-rolls (singles up to 4-packs)

MODEL 3: Drinks and Edibles Designated Bar Program Model

Event Access	Ticketed, Gated, 18+, state or private property
Retail Sales	<p>Cannabis drinks and edibles available at dedicated event bar(s)</p> <ul style="list-style-type: none">• Designated retail sales area for cannabis-infused beverages and edibles with bartenders re-checking IDs and looking for 21+ bands/stamps• Bar area must be surrounded by bike rack/barricade perimeter with security re-checking IDs and looking for 21+ bands/stamps - only guests 21+ may enter this designated space• Cannabis retail sales may only take place at the bar
Cannabis Consumption	Consumption of all cannabis beverages and edibles is restricted to areas where alcohol consumption is allowed
Approved Products for Sale and Consumption	<p>Edibles and Drinks Only:</p> <ul style="list-style-type: none">• Edibles limited to 10mg per package• Drinks limited to 5mg per 12oz beverage

Why Should We Invest in Multiple Permitted Models for Cannabis Consumption and Sales at Outdoor, Live Events that Include Inhalable Cannabis Products (Flower and Vapes)?

Outdoor, live events do not have the same intensive infrastructure requirements necessary to reduce the harm of smoking due to natural, unlimited ventilation outdoors.¹³

Offering different sales and consumption models also allows eligible venues, promoters, and event operators to determine how they would like cannabis to be presented in their program (if at all). For example, a venue hosting a 21+ only event may decide that having designated smoking areas best suits their crowd, whereas the operator of a cannabis-themed program may be more comfortable with an open consumption and retail sales model.

How Can We Manage Air Quality and Learn More About the Impacts of Outdoor Consumption of Vapes and Flower Products?

In addition to natural outdoor ventilation, outdoor programs where inhalable products are present should engage an air quality monitor to ensure that all guests have a safe and healthy event experience. Air quality monitoring is not only a way to ensure healthier spaces, but it also allows us to gather valuable data to inform future policy and assure host communities have transparency around activities in event spaces in their neighborhoods.¹⁴ We recommend that venues and outdoor, live events that would like to have inhalable cannabis products and consumption in their spaces engage an air quality professional from a third-party company to develop and implement an Odor Control Plan and conduct continuous air quality monitoring.¹⁵

How Can We Ensure that Communities Interests are Represented?

Community input is critical to the success of an Outdoor Live Events Cannabis Retail Sales Program. As with other regulated substances (like alcohol and tobacco), the county/community should have the opportunity to have input on how/when consumption (if any) should be allowed at outdoor programming in their neighborhoods.

How Do We Close the Door on Unregulated Sales and Consumption at Outdoor, Live Events?:

According to retail sales data from the Maryland Cannabis Administration, flower sales make up 60% of all cannabis products sold in the state. In comparison, concentrates (vapes) represent 28% of retail sales and¹⁶ edibles 12%. By not including inhalable products in outdoor live event sales models and meeting consumer demand, licensees lose out on potential revenue and the door is left open for the unregulated sales of untested products along with attendees consuming in places where they think they can avoid detection.

Maryland Cannabis Retail Sales Data (May-Oct. 24):¹⁷

\$342M Flower Sales ~ 60%
\$168M Concentrate Sales ~ 28%
\$71M Edibles Sales ~ 12%
\$581M Total Sales

May

- \$59M Flower
- \$26M Concentrate (includes vapes, etc)
- \$13M Edible (includes drinks where available)

June

- \$56M Flower
- \$28M Concentrate (includes vapes, etc)
- \$11M Edible (includes drinks where available)

July

- \$58M Flower
- \$28M Concentrate (includes vapes, etc)
- \$12M Edible (includes drinks where available)

August

- \$59M Flower
- \$29M Concentrate (includes vapes, etc)
- \$12M Edible (includes drinks where available)

September

- \$54M Flower
- \$28M Concentrate (includes vapes, etc)
- \$11M Edible (includes drinks where available)

October

- \$56M Flower
- \$29M Concentrate (includes vapes, etc)
- \$12M Edible (includes drinks where available)

Using the suggested retail and consumption models shared above, outdoor events can be tailored to maximize public health, while allowing for varied modes of consumption. Cannabis can be consumed by inhalation through pre-roll retail sales (in designated areas/when appropriate), while edibles (including infused beverages) can be available for those who prefer to consume by ingestion. By allowing and planning for varied modes of consumption, all cannabis consumers – *including medical patients* – can access safe, regulated products that serve their needs, in addition to maximizing economic opportunities for all stakeholders.

PART 2

ECONOMIC OPPORTUNITY

How does an outdoor, live events cannabis sales program benefit social equity and small business licensees?

Throughout the cannabis industry, social equity licensed retailers are small businesses, single locations, and brick-and-mortar store owners. Not only are they subject to the tax burdens and other associated costs of being a cannabis business owner, but they are frequently fighting for brand awareness against larger operators with big budgets for marketing and community outreach.

An outdoor, live events cannabis retail sales program limited to small business and social equity operators carves out lucrative benefits specifically for single-storefront, small business licensees. This program will provide these businesses access to large marketing platforms along with a chance to experience high-volume, high-sales weekends a few times a year without needing to close down the shop or shoulder the expense of opening another location.

Note: Only including edible products (including drinks) in a cannabis retail sales program encourages a direct-to-venue concessions model, greatly reducing any benefit to small business and social equity retailers.

How does an outdoor, live events cannabis retail sales program benefit the broader Maryland cannabis industry?

High-volume weekends for licensed retailers mean a higher demand for products and more revenue for Maryland's cultivators and manufacturers. In addition, like alcohol and food, products sold at events may be sold at a premium.

How does an outdoor, live events cannabis retail sales program benefit venues and events?

Maryland is home to hundreds of annual, outdoor, 21+ events and festivals catering to a diverse range of interests, cultures and traditions. Live events are revenue generators for communities and municipalities. They are also cultural cornerstones, attracting local residents and visitors to the city/state. In recent years, 21+, live music venues and outdoor events have seen alcohol sales decreasing rapidly. In contrast, according to research by New Frontier Data, there has been an increase of 21+ adults consciously choosing cannabis over alcohol.¹⁸

According to data from a recent study of nationwide alcohol sales conducted by the Spirit Business, spirit sales alone have seen a 3.9% drop while wine has declined by 8%. Beer sales are also down by 7%. Combined, drinks containing alcohol have seen a decline of 6.3%. In 2023, Maryland reported alcohol net sales totaling \$487,958,788. Using 2023 sales numbers, a 6.3% decline in sales represents nearly \$31M¹⁹ in missed revenue and corresponding sales taxes.

Live event venues and promoters have a chance to benefit from the excitement around cannabis by implementing pragmatic retail sales and social consumption rules for their programs, attracting new sponsors and selling additional tickets to potential attendees interested in alternatives to alcohol.

Revenue Projections and Benefits

The chart below represents revenue projections for a two day, 30-35,000 attendees, 21+, outdoor live event. These projections are based on data gathered from from compliance partners running cannabis retail sales programs at comparably sized, age-gated, 21+ events on the West Coast. Their events offer a full range of cannabis products (cannabis flower, vapes, edibles, and beverages):

Revenue Projections	
<p>Revenue projections based on the following:</p> <ul style="list-style-type: none">• Two day event• 30-35,000 attendees in total• Average 15,000 attendees/day - assuming 60% (9,000) make purchases from onsite cannabis retailers• Average 2 items purchased per attendee• Average price per item: \$29• Average spend per customer: \$58	<p>Assuming twenty (20) social equity retail partners, the total projected revenue for a 2-day program would be:</p> <ul style="list-style-type: none">• Average projected revenue per social equity retailer: \$52,200• Projected Retail Sales Tax Revenue for the State (9%): \$93,960• Total projected revenue for 2-day event: \$1,044,000

Maryland stands to gain millions of dollars in sales tax revenue and special licensing fees annually, in addition to the broader economic impact of outdoor, live events.

In addition to potential revenue, an outdoor, live events cannabis sales program can:

- **Raise the profile of Maryland small and social equity businesses**
- **Drive revenue to social equity operators** through high-volume, high-revenue events
- **Generate revenue for cultivators, manufacturers, and ancillary businesses** far beyond gates of the event
- **Drives a boost in retail sales tax to Maryland**

The pilot program will make history as the first program of its kind to be solely focused on social equity operators, and possibly act as a blueprint for other states looking to boost revenue for small, social equity business owners.

CONCLUSION

Cannabis is already present at outdoor, live events.

Creating a structured, regulated program for retail sales and social consumption creates a healthier environment and experience for all qualifying event guests while maximizing revenue to small business owners, the local economy, and the state of Maryland.

Maryland has an exciting opportunity to set the bar with a first-of-its-kind, harm reduction-focused, outdoor live events cannabis retail sales program to benefit small businesses and social equity licensees. By developing a comprehensive program, the State can create new revenue streams for Maryland's cannabis licensees and the broader community.

Offering sales and consumption models that give event attendees varying access and exposure to cannabis, in combination with allowing counties to determine the guidelines that best suit their communities -- giving residents a say in how cannabis may be included in local events -- ensures that the **interest of all stakeholders are considered and protected.**

A well-run program offers Maryland's small business and social equity licensees access to high-volume, high-revenue events to support business sustainability, at no cost to the state. It also works to expand access to the regulated cannabis market, increases consumer safety, and facilitates opportunities for harm reduction and evidence-based drug education for adult consumers.

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Witness Statement for Senate Bill 215 PDF.pdf

Uploaded by: Taylor Green

Position: FWA

Witness Statement for Senate Bill 215

Maryland Senate Finance Committee

Date: January 28, 2025

Dear Chair and Members of the Finance Committee,

My name is Taylor Green, and I am submitting this testimony on behalf of Ember DMV LLC (Ember), a newly established micro dispensary and social equity applicant preparing to launch operations. We are committed to advancing Maryland's cannabis industry and fostering equitable opportunities for small businesses like ours. Thank you for the opportunity to provide comments on Senate Bill 215, titled *Cannabis - On-Site Consumption Establishments and Cannabis Events*.

Senate Bill 215, introduced on January 8, 2025, by the Chair of the Finance Committee at the request of the Maryland Cannabis Administration (MCA), seeks to establish provisions for on-site cannabis consumption establishments and cannabis events. While this legislation represents an exciting step forward for Maryland's cannabis community, Ember seeks clarification and amendments to ensure micro dispensaries can participate fully in this evolving landscape.

As a micro dispensary, Ember is limited by the prohibition on brick-and-mortar establishments. This restriction challenges our ability to connect with consumers, promote our products, and engage with the broader cannabis community. The opportunities provided by on-site consumption establishments and cannabis events offer a promising avenue for micro dispensaries like ours to showcase our products and services in a community-centered environment. However, the current legislation lacks clarity on whether micro dispensaries can participate in or host these events.

To address these concerns, we respectfully propose the following considerations and amendments to Senate Bill 215:

1. **Permit Micro Dispensaries to Participate in Cannabis Events:** Clarify that micro dispensaries can participate in cannabis events, either through partnerships with existing dispensaries or by obtaining permits to showcase and sell products at events hosted at on-site consumption establishments or other approved venues. This inclusion is vital for micro dispensaries to build brand recognition, engage directly with consumers, and compete in the market.
2. **Clarification on Off-Site Cannabis Events:** Provide clear regulatory guidance on whether cannabis events can take place at locations other than on-site consumption establishments, provided the organizers obtain the necessary permits. For events held outside of designated on-site consumption establishments, cannabis consumption should not be permitted. However, in such cases, alcohol consumption should be

allowed, provided there is no cannabis consumption at the event, ensuring alignment with existing regulations. To further support safe practices, cannabis purchased at such events could be distributed only upon exit, preventing on-site use and ensuring attendees do not re-enter with the product. While we recognize concerns about potential substance mixing, it is important to note that nothing prevents attendees from leaving an event to use cannabis elsewhere, such as at a neighborhood bar. This is ultimately the responsibility of the consumer. To mitigate these risks, we can ensure that educational materials and reminders about the dangers of combining substances, including the implications of driving under the influence of cannabis, are made readily available at all events.

3. **Equity in Access to Cannabis Events:** Ensure that the permitting process for cannabis events is inclusive and accessible to social equity applicants like Ember. The current proposed fee of \$5,000 for permits is prohibitively high for micro licenses, which already operate under significant financial constraints. Micro dispensaries face nearly identical operational costs to standard dispensaries, including compliance, staffing, and logistical expenses, while being limited by employee caps. A reduced fee structure for micro dispensaries and other micro-businesses would provide much-needed relief and ensure equitable participation in cannabis events.
4. **Collaboration with Existing On-Site Consumption Establishments:** Explicitly permit micro dispensaries to collaborate with licensed on-site consumption establishments to host promotional events or product showcases. This provision would create a pathway for micro dispensaries to engage with the community and contribute to the growing cannabis culture in Maryland.

The inclusion of micro dispensaries in cannabis events aligns with the intent of Maryland's social equity program by providing us with opportunities to connect with consumers, build our brand, and generate revenue. Without such opportunities, micro dispensaries risk being excluded from critical market-building activities that are essential for long-term success.

Ember's participation in cannabis events would allow us to demonstrate our commitment to quality, safety, and community engagement. Events also provide an ideal platform to educate consumers about our products and services, strengthen partnerships with other businesses, and promote the broader acceptance of cannabis in Maryland.

We urge the Committee to consider these recommendations and ensure that Senate Bill 215 provides micro dispensaries with equitable access to on-site consumption establishments and cannabis events. Thank you for your attention to this matter. I am available to provide further information or participate in additional discussions as needed.

Sincerely,

Taylor Green, J.D., M.B.A
Chief Operating Officer, Ember
tgreen@emberdmv.com

SB 215.pdf

Uploaded by: David Hogan

Position: UNF

I deem this bill to be unfavorable. My name is David, i've worked in the Maryland cannabis industry for 6 plus years. From my extensive experience within the industry, I know that nothing good will come from this proposed bill. By not allowing cannabis consumption at events or at gatherings you will almost eliminate the community entirely. Ultimately crushing the experience that every cannabis consumer in Maryland wants. The ability to learn, educate and experience cannabis in a social setting. The goal of this bill is unclear. It is an aimed attack towards small businesses working day and night to enter the legal cannabis market through the steps set up by the state. This legislation shouldn't be passed and we need to work harder to create a better solution. In addition, rather than having the MCA manage i propose a new administration entirely. One separate but equal to the MCA. This administration should oversee all events and gatherings for the small businesses and brands in the Maryland cannabis industry. Having one committee that represents the largest cannabis businesses in the state also regulates the smallest businesses will monopolies as well as predatory business practices. The state of Maryland needs to promote fair business guidelines for businesses of all sizes big or small.

Sincerely,

David Hogan

Born & raised resident of Maryland

HOUSE BILL 132 SB 215.pdf

Uploaded by: Dawn Gordon

Position: UNF

Dear Members of the Maryland General Assembly,

I am writing to express my strong opposition to HB132 and SB215, which propose event restrictions that would negatively impact small businesses like mine, Fingerboard Farm and Fingerboard Country Inn. As Maryland is now a legal cannabis consumption state, I believe these measures unjustly overreach by attempting to place private property under the control of the Maryland Cannabis Administration (MCA). Such regulations not only harm small businesses but also undermine the principles of fairness and individual liberty that our Constitution seeks to protect.

My businesses provide unique, community-oriented venues for safe and responsible cannabis consumption, supporting local economies and fostering social and cultural connections. These proposed restrictions would create unnecessary barriers to hosting events, stifling the growth of small enterprises like mine while favoring monopolistic interests that already dominate the market. This disproportionate regulatory burden risks eroding the diversity and accessibility of Maryland's burgeoning cannabis industry.

The proposed event restrictions would:

1. **Harm Small Businesses**: Fingerboard Farm and Fingerboard Country Inn are family-run establishments that rely on events to sustain our operations and serve our community. Imposing additional bureaucratic oversight by the MCA would increase costs and operational complexities, putting our businesses at risk.
2. **Disadvantage Consumers**: By restricting access to private venues where individuals can responsibly consume cannabis, these measures limit consumer choice and convenience. Marylanders deserve safe, regulated spaces to enjoy legal cannabis without undue interference.
3. **Benefit Monopolies**: These restrictions appear to favor large corporations with the resources to navigate complex regulatory frameworks, effectively squeezing out smaller competitors and consolidating market control. This goes against the spirit of fostering a fair and equitable cannabis industry.
4. **Infringe on Property Rights**: As a property owner, I have the right to determine how my private land is used within the bounds of existing law. Extending MCA authority to private property for events represents an overstep that undermines these fundamental rights.

I urge the General Assembly to consider the broader implications of HB132 and SB215. Instead of enacting restrictive measures that hinder small businesses and curtail consumer freedoms, I recommend pursuing balanced regulations that support responsible cannabis consumption while preserving opportunities for local entrepreneurs to thrive.

Maryland's transition to legalized cannabis should be guided by policies that prioritize equity, opportunity, and community benefit—not by imposing restrictive measures that serve the interests of monopolies at the expense of small businesses and individual liberties.

Thank you for your attention to this critical matter. I respectfully request that you vote against HB132 and SB215 to protect small businesses, uphold consumer rights, and support a diverse and thriving cannabis industry in Maryland.

Sincerely,
Dawn Furman
Owner, Fingerboard Farm and Fingerboard Country Inn
Dawn@fingerboardfarm.market
301-674-8010

SB0215_UNF_MedChi_Cannabis - On-Site Consumption E

Uploaded by: Drew Vetter

Position: UNF



The Maryland State Medical Society
1211 Cathedral Street
Baltimore, MD 21201-5516
410.539.0872
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www.medchi.org

Senate Finance Committee
January 30, 2025

Senate Bill 215 – *Cannabis – On-Site Consumption Establishments and Cannabis Events*
POSITION: OPPOSE

The Maryland State Medical Society (MedChi), the largest physician organization in Maryland, opposes Senate Bill 215. This bill establishes rules and requirements regarding the licensing and operation of on-site consumption of cannabis. The bill also establishes new registration and permits for “cannabis events” where a temporary registration is issued by the Maryland Cannabis Administration (the “MCA”). Cannabis Events are defined as events that involve the consumption of cannabis products by individuals on the premises of the event. The consumption of edible cannabis products and cannabinoid beverages may be consumed at such events. The events may be conducted over 48 hours and 4 consecutive days.

MedChi urges the Committee to exercise caution regarding approving new authority for cannabis events. Cannabis edibles and beverages pose unique public health challenges due to their delayed onset of effects, which can lead to unintentional overconsumption. Unlike inhaled forms of cannabis, the effects of edibles and beverages may take 30 minutes to two hours to manifest and can last for several hours after onset. During this delay, individuals may mistakenly believe they have not consumed enough and ingest additional doses, resulting in excessive intake. This poses a serious risk, especially in a public event where peer pressure and social dynamics may influence consumption behaviors. The delayed onset and potential for overconsumption are significant contributors to cannabis-related emergency room admissions. Overconsumption of edibles can lead to adverse effects, such as severe anxiety, paranoia, and, in some cases, psychosis.

MedChi appreciates that this bill seeks to establish a regulated framework for cannabis use at these events, including age restrictions, alcohol restrictions, requirements for following manufacturing standards, laboratory testing, and packaging and labeling standards. However, we feel that this bill's public health protections are not strong enough. Any legislation on this topic must include strong public health safeguards, recognizing the risks of delayed onset and provide necessary resources, such as medical assistance and emergency services.

MedChi would be happy to work with the sponsors of this legislation to ensure that public health and safety measures are fully incorporated into this policy proposal. However, given the number of concerns we have with the bill as introduced, MedChi respectfully requests an unfavorable report.

For more information call:

Andrew G. Vetter
J. Steven Wise
Danna L. Kauffman
Christine K. Krone
410-244-7000

Statement for HB0132.pdf

Uploaded by: Lakia Harris-Pierce

Position: UNF

Statement on HB 0132: Opposition to Restricting Lounge Licenses to Social Equity Applicants

I am against HB 0132, which limits on-site cannabis consumption lounge licenses to social equity applicants. The definition of “social equity” being used is flawed and does not reflect true inclusivity or fairness.

As a Black woman from the second poorest county in Maryland and a disabled veteran, I have been excluded from participating in the cannabis industry. Despite earning a Master of Social Work and a Master of Science in Cannabis Science and Therapeutics, I’ve still faced systemic barriers. Because I didn’t live in one of the designated zip codes, attend school there, or graduate from an HBCU, I was ineligible to qualify as a social equity applicant. The on-site consumption lounge license was my last hope to enter the industry and contribute to this growing market. Now, HB 0132 shuts that door too.

Adding to my challenges, the military discharged me over cannabis use without even having an actual positive urinalysis on record. I only discovered this 12 years after my discharge. That injustice derailed my career, forcing me to fight to rebuild my life and professional standing. Yet here I am, working to bring equity and fairness to an industry that should be accessible to all.

What does real social equity look like? It should be about creating opportunities for people like me—those who have been marginalized and are trying to build a future in an industry that has historically harmed our communities. Instead, this bill reinforces barriers and denies access to someone like me who represents exactly what equity should include.

I’m asking that you open lounge licenses to everyone and ensure that every county, especially those on the Eastern Shore, can have at least two lounges. We can already purchase cannabis from dispensaries and cultivators—why not allow broader access to on-site consumption lounges?

If you truly want cannabis reform to be equitable, including someone like me in this industry would be a step in the right direction.

Lakia Harris-Pierce, MSW, MCST

LaWann Stribling Testimony sb215.docx.PDF

Uploaded by: LaWann Stribling

Position: UNF



Maryland General Assembly
Senate Finance Committee
Annapolis, MD - January 28, 2025

Testimony from LaWann Stribling, STRIB'ble District LLC

Unfavorable: Cannabis - On-Site Consumption Establishments and Cannabis Events [SB0215](#) ([HB0132](#))

The Cannabis - On-Site Consumption Establishments and Cannabis Events (SB0215) bill could infringe on the community's right to host events without a permit in several ways. This bill would impose regulations and permit requirements for events where cannabis is consumed, which could limit certain freedoms and create barriers for individuals and organizations wishing to host cannabis-related events in a more informal, holistic, spiritual or grassroots manner.

Here are a few reasons how the bill could infringe on community rights to host events:

1. Requirement for Permits and Regulation:

One of the primary ways this bill could infringe on community rights is by requiring specific permits for any event where cannabis consumption is allowed. Under SB0215, a community or individual would likely need to go through a formal application process to receive permission from local or state authorities to host events where cannabis consumption is permitted. This could limit the ability of smaller organizations or community groups to host such events without bureaucratic hurdles.

Impact: For communities that prefer a more informal or decentralized approach to hosting events (like pop-up gatherings, festivals, or private gatherings), the necessity of obtaining a permit could create a financial or administrative barrier. These events might no longer be able to take place without the proper approvals, reducing autonomy in organizing cannabis-friendly gatherings.

2. Restrictions on Where Events Can Be Held:

The bill likely includes stipulations on where cannabis consumption can legally take place, which could infringe on communities' rights to host cannabis events in private or public spaces. For instance, the bill may restrict events to certain types of venues or designated areas that meet specific requirements—perhaps limiting where these events can be held (like requiring them to be in licensed cannabis consumption lounges or event spaces).

Impact: Communities or groups might find themselves limited in their choices of venue and unable to hold cannabis events at locations they would prefer. This could reduce freedom for local organizers who want to create more inclusive or flexible spaces for cannabis events that align with their community values.

3. Increased Government Oversight and Control:

The bill's framework for regulating on-site cannabis consumption might increase government oversight in a way that could infringe upon community freedoms. For example, local authorities could require monitoring or reporting on cannabis consumption events, enforcing certain restrictions on the size of the event, the number of attendees, and even the types of cannabis products allowed.

Impact: Increased regulation could stifle the ability for grassroots, community-driven cannabis events to thrive freely. Communities may feel that this added control diminishes their right to organize events on their terms or within their own local culture. It could particularly affect small, independent event organizers who might not have the resources or desire to navigate the complex legal landscape.

4. Potential Financial Burdens:

Depending on the cost of obtaining permits and meeting legal requirements, this bill could impose financial burdens on individuals or small businesses wanting to host cannabis events. Permit fees, insurance requirements, and compliance with various safety regulations could make it more difficult for certain groups—especially those with limited financial resources—to organize events.

Impact: This would particularly affect community organizations, nonprofits, or smaller local event planners who may not have the budget for extensive legal and regulatory requirements. This could inadvertently exclude certain groups from hosting events, infringing on their right to self-organize and create spaces for cannabis enthusiasts.

5. Effect on Private Gatherings:

In some cases, the bill may also affect private events where people may want to consume cannabis in their own space. If the law mandates that public or private events with cannabis consumption need permits, people hosting private parties or gatherings could be limited in their

ability to do so freely, especially if the event is larger than a certain size.

Impact: It could lead to concerns about privacy and freedom of choice. People who just want to host small gatherings with cannabis consumption may feel like they are being unnecessarily regulated or penalized for something they consider a private matter.

6. Restrictions on the Types of Events:

The bill could limit or heavily regulate the types of events where cannabis consumption is allowed. For example, certain festivals, community gatherings, or even educational events about cannabis might find themselves restricted from allowing consumption, unless they meet very specific criteria.

Impact: It may unintentionally curb the diversity of cannabis-related events, especially those that seek to integrate cannabis culture with other types of events (such as art, music, or food festivals). Communities could feel that their rights to host events in a more inclusive way are being compromised.

Conclusion:

While SB0215 aims to create safe and regulated spaces for cannabis consumption, it could infringe on the right of communities to host cannabis events without seeking a permit or following strict regulations. This would create a more controlled environment that might stifle the grassroots, informal nature of cannabis gatherings, limit freedom in choosing venues or event types, and impose financial and bureaucratic barriers on small-scale event organizers.

Thank you for accepting my testimony for our community and individuals like me that are social equity and did not qualify but utilize the herbs holistically as medicine and food would be dramatically affected.

LaWann Stribling

Bowie, MD 20715

SB 0215 - Cannabis Public Health Advisory Council

Uploaded by: Maryland Department of Health /Office of Governmental Affairs

Position: UNF

MARYLAND CANNABIS PUBLIC HEALTH ADVISORY COUNCIL

Deondra P. Asike, M.D.

January 30, 2025

Dawn Berkowitz, MPH, CHES

Jocelyn Bratton-Payne, MSW

Nora Urbieta Eidelman

David A. Gorelick, M.D., Ph.D.

Delegate Terri Hill, M.D.

Senator Benjamin Kramer

Elizabeth Kromm, Ph.D.

Karrissa Miller, MSW

Madhuri Mitra, Ph.D.

Martin Proulx

Jason Semanoff

Leah Sera, PharmD.

Nishant Shah, M.D.

Leigh Vinocur, M.D.

Bethany Young, Ph.D., J.D.

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

RE: SB 215/HB 132 - Cannabis - On-Site Consumption Establishments and Cannabis Events - Letter of Opposition

Dear Chair Beidle:

The Maryland Cannabis Public Health Advisory Council (the Council) is submitting this letter of opposition for **Senate Bill (SB) 215/House Bill (HB) 132 - Cannabis – On-Site Consumption Establishments and Cannabis Events**. SB 215/HB 132 establish permissible business operations and other requirements for on-site cannabis consumption establishments and for cannabis events.

The Council supports the goal of enlarging opportunities for social equity cannabis licenses, but opposes SB 215/HB 132 due to the unknown public health risks imposed by this very new consumption model, including a possible increase in cannabis-impaired driving, potential exposure of minors to cannabis products and advertising, and the introduction of a new license category with which we have little information on which to base regulations. Additionally, the bills do not include necessary restrictions that already apply to licensed cannabis dispensaries, including the location, advertising and promotion of on-site cannabis consumption establishments and cannabis events.

SB 215/HB 132 expands public access to two types of legal oral cannabis products: “edibles” and beverages. Cannabis products ingested orally characteristically take 30-60 minutes to begin exerting their effects; effects may last for 8-12 hours.¹ This pattern means that many customers at an on-site cannabis consumption establishment or cannabis event will not be visibly intoxicated while on-site, so remain eligible to purchase multiple single servings of cannabis product. They will become visibly intoxicated after they leave the site, increasing the risk of motor vehicle crashes and other public health harms.^{2,3} This is a very different pattern than that of alcohol intoxication, 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 regulating intoxication from oral cannabis ingestion.

In addition, were a cannabis consumer to become intoxicated while on-site, evaluation of their level of intoxication would be left to the subjective judgement of establishment staff, which increases the potential for problematic interactions. Unlike for alcohol, there is currently no objective, scientific method for measuring cannabis intoxication.

The Council supports the goal of limiting total on-site consumption of cannabis by an individual customer. 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 amount. However, the bills' limit of sales to single-servings containing no more than 5 mg THC will not prevent such over consumption. Nothing in the bills 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.

Additionally, the Council is concerned that SB 215/HB 132 do not place any restrictions on where on-site cannabis consumption lounges and cannabis events can be located and does not clarify whether the current advertising restrictions apply to cannabis events. Current Maryland law prohibits licensed cannabis dispensaries from locating within 500 feet of pre-existing schools, playgrounds, childcare centers and other public spaces where children are present and from advertising or sponsoring events unless the audience is reasonably expected to be 21 years or older. These statutory restrictions are rooted in the considerable body of public health research showing that exposure to cannabis dispensaries or cannabis advertising is associated with positive attitudes towards cannabis use and increased use.^{4,5} The bills do allow local jurisdictions to ban on-site cannabis consumption establishments and cannabis events or limit their location (using zoning authority). The Council believes that leaving such important public health restrictions to local authorities is insufficient protection for the health of Marylanders.

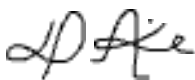
Additionally, the Council is concerned that proposed cannabis events would allow the presence and consumption of both cannabis and alcohol. This combination of two intoxicants contravenes current Maryland public health messaging that strongly advises against such use. Ample public health evidence shows the co-use of alcohol and cannabis produces increased intoxication.⁶

Finally, the Council is required to develop consumer educational materials for on-site consumption establishments, in accordance with MD Code, Health - General, § 13-4504. As SB 215/HB 132 do not establish an implementation timeline for licensing of such establishments, the Council feels it is premature to develop these materials.

Were Maryland to authorize these new venues for cannabis consumption, the State would be entering into an area where there is insufficient data to mitigate any public health harms.

For these reasons, the Council respectfully urges this Committee to issue an unfavorable report on SB 215/HB 132. The Council recommends the legislature delay the requirement for MCA to issue licenses for on-site consumption until sufficient information has been gathered to determine the public health implications.

Sincerely,



Deondra Asike, M.D.
Chair, Maryland Cannabis Public Health Advisory Council

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Testimony of Phillip Riggin.pdf

Uploaded by: Phillip Riggin

Position: UNF

Testimony of Phillip Riggan

Opposition to SB215/HB132 – Cannabis On-Site Consumption Establishments and Events

Chair, Vice Chair, and Members of the Committee,

I respectfully oppose SB215 and urge the committee to issue an unfavorable report.

The original intent behind on-site consumption was to provide a safe space for residents—particularly those in low-income neighborhoods—who may not be allowed to consume cannabis in their own residences. This bill, however, shifts that focus and primarily benefits those with greater financial means, leaving behind the communities it was meant to serve.

Concerns with the Bill

1. Impact on Public Cannabis Events

The cannabis community is deeply concerned that this bill could restrict public events where individuals share, rather than sell, cannabis. Can the committee assure that this legislation will not apply to such gatherings? Additionally, can this bill be amended to prevent counties from banning consumption-only events held on private property?

2. Event Fee Structure is Cost-Prohibitive

The proposed fee structure makes small events (under 1,000 attendees) financially unviable. Retailers would face event fees that effectively amount to \$2.50 per attendee—regardless of whether they purchase cannabis. Event fees should be based on actual sales, not attendance.

3. Unreasonable Restrictions on Personal Cannabis Use

This bill prohibits attendees from bringing their own cannabis to events and from taking home cannabis they have legally purchased on-site. Who will enforce these provisions, and how? This creates unnecessary enforcement challenges and burdens consumers.

4. Ban on Smoking and Vaping at Events

Given that smoking and vaping account for 60–70% of cannabis consumption, banning these methods at cannabis events is a significant red flag. Events should allow designated outdoor smoking areas in jurisdictions where tobacco smoking is already permitted.

5. Safety Concerns with Edibles at Large Events

The bill allows the sale of standard edibles at large events, which is a recipe for unintended hospital visits. Many first-time users will inevitably be present, and the 45–60+ minute onset time for edibles makes dosing unpredictable. Experienced consumers will have little incentive to pay a premium for on-site consumption when they can consume beforehand and avoid delays in onset. This issue can be addressed

through regulation but underscores a broader lack of foresight in the bill's design.

6. Green Waste and Safe Handling Issues

The bill presents logistical and environmental challenges by restricting consumers from taking home partially consumed single-dose cannabis products. This increases waste and complicates disposal efforts. A more practical approach would be to allow consumers to take home their unused portions to reduce green waste.

7. State-Level Permitting vs. Local Control

Unlike alcohol event permits, which are typically managed at the county level, this bill centralizes permitting at the state level. I strongly urge the committee to shift permitting authority to the counties to better reflect local needs and enforcement capabilities.

Conclusion

This bill, as currently written, fails to serve cannabis consumers effectively and presents significant regulatory, economic, and enforcement challenges. It requires substantial revision to align with its intended purpose and ensure fairness and accessibility. I urge the committee to reject SB215/HB132 in its current form.

Thank you for your time and consideration.

Phillip Riggin

SB0215 - unfavorable testimony.pdf

Uploaded by: Robert Davis

Position: UNF

Good afternoon my name is Robert Davis R.Ph owner of OC botanicals LLC doing business as hi-tide dispensary fully licensed in the State of Maryland.

Opposition to SB 0215. The Language specifically on Page 10 -Decriminalizing the sale of Cannabis.

(K) A PERSON WHO HOLDS AN UNAUTHORIZED CANNABIS EVENT IN VIOLATION OF THIS SECTION IS GUILTY OF A MISDEMEANOR AND ON CONVICTION IS SUBJECT TO A FINE NOT EXCEEDING \$5,000.

The above language would open the door to illegal Cannabis sales as it would be extremely profitable for unlicensed groups to sell illegal cannabis to the tune of hundreds of thousands of dollars a month or more. Given this language in the Bill The penalty for such would be a misdemeanor and a maximum of \$5000 if and when a conviction was to take place years later.

The language in this Bill aims to weaken Maryland's position on the illicit cannabis market. We know the impact this will have on what has thus far been a highly successful legal industry as regulated by the state of Maryland because we have seen what relaxed laws on the illicit market have done to states like Nevada, New York and California. According to an article written last month and published in the Nevada Independent, the illegal market generated roughly 30 to 45% of the revenue that the legal market did last fiscal year in Nevada. That's hundreds of millions of dollars that were taken away from legal business owners and the state because of a flourishing illicit market.

While this bill looks to loosen its grip, New York has done the opposite and seen great success. A news report cited in 2024 -- New York conducted over 1-thousand inspections and seized more than \$68-million-dollars worth of illegal cannabis. The Empire State is expected to generate \$161.8 million in tax revenue from its legal Cannabis business for the fiscal year ending March 31st -- that's four times more than what it raked in last year and a direct result of its crack down on the illicit market. Democratic Governor Kathy Hochul was quoted yesterday in the New York Post saying "Now, legal entrepreneurs are thriving while lawbreakers are being held accountable."

This bills Language would ensure lawbreakers are NOT held accountable and it would undermine the incredibly successful industry this state has built. In due course, we would look just like New York did a year ago. My business would be left in peril and the state's revenue from our industry would be cut significantly.

Sincerely,

Robert H Davis R.Ph

OC Botanicals LLC
Owner / Clinical Director

SB0215 VI22 (2).pdf

Uploaded by: Shanetha Lewis

Position: UNF

VETERANS INITIATIVE 22

Because We C.A.R.E

Testimony on Maryland Senate Bill 0215:

TO: Senator Pamela Beidel Chair, Senate Finance Committee and Committee members

FROM: Shanetha Lewis, Veterans Initiative 22, Executive Director

DATE: 01/28/2025

BILL: SB0215

POSITION: **Unfavorable**

Veterans Initiative 22 is a 501(c)(3) non-profit organization that focuses on helping Veterans, Family and First Responders by providing resources, employment opportunities, and continuously advocating for rights and access to affordable cannabis and Veteran rights. VI 22 was named as such after the estimated 22 Veterans who commit suicide daily due to PTSD, and it is our organization's goal to bring national awareness to this tragedy, while also working to improve the lives of Veterans across the country.

Please note our strong **opposition** for this bill. For the following reasons:

I write to express our organization's unfavorable position for SB0215, which seeks to regulate on-site cannabis consumption establishments and cannabis events. I recognize and respect that this bill represents a vital step toward creating structured opportunities for safe and legal cannabis use within the community, fostering equitable participation in the cannabis industry while prioritizing public health and safety.

However, I respectfully recommend a clarification regarding the following language within the bill:

The definition of a "cannabis event," as outlined in Section 36-407.1(A)(2). Specifically, the bill defines a cannabis event as one involving "the consumption of cannabis products by individuals on the premises of the event," authorized through a cannabis event registration. While this definition outlines basic parameters, further specificity would aid stakeholders in understanding the intended scope and limitations of such events. For example, clarification could address:

1. **Permitted Types of Consumption:** Explicitly stating whether "consumption" includes edible products, beverages, topicals, or other forms beyond what is already prohibited (e.g., smoking or vaping).

VETERANS INITIATIVE 22

Because We C.A.R.E

2. **Regulatory Guidance:** Defining what constitutes appropriate "premises of the event," such as temporary structures, outdoor venues, or enclosed spaces.
3. **Event Scope and Audience:** Providing guidance on whether events can include educational, cultural, or entertainment components alongside cannabis consumption.

Due to the ambiguity in the current language of the bill being proposed, as well as, within the current COMAR regulations regarding adult consumption, adult consumers and organizations that hold private adult only events that allow adult consumption, are in a current state of confusion.

I find the proposed fees for registering cannabis consumption events to be excessively high, creating significant economic barriers for businesses or organizations hosting smaller, consumption-friendly gatherings. Additionally, much of the language surrounding cannabis events seems to imply that such events are primarily recreational or "party-like" in nature. In reality, many of these gatherings are therapeutic in focus, emphasizing health, wellness, and community support. It is important that the framework acknowledges and accommodates the diverse purposes these events serve.

Additionally, I support the bill's emphasis on ensuring social equity by limiting applications for consumption lounge licenses to social equity applicants, as well as its safeguards to prohibit intoxicated patrons and underage access. These measures align with the overarching goals of public safety and responsible use. However I do feel again that there is a lack of clarity in what are the "certain circumstances" that would permit those outside the approved social equity applicants to apply for a consumption lounge license. Our organization stands staunchly in support of INCLUDING veterans as part of the persons who can qualify as "social equity" and has found this lack of inclusion to be a travesty and affront to the former service members who sacrificed for this great country and then are denied inclusion into these social equity programs.

Thank you for the opportunity to provide input. I am confident that with the proposed clarification, SB0125 will better serve Maryland's cannabis community and industry. Again I thank you for your time in reading my testimony and for your consideration of my position. Cannabis is medicine and unrestricted affordable access to cannabis improves and saves lives!

We urge a unfavorable report on **SB0215**.

VETERANS INITIATIVE 22

Because We C.A.R.E

Thank You,

Shanetha Lewis
Veterans Initiative 22
Executive Director
304-322-6384
info@vetransinitiative22.com

sb215 testimony.pdf

Uploaded by: Travis Hale

Position: UNF

To Whom it may Concern,

I am writing to you to speak out against SB215. In its current state, this bill would do more harm than good for not only the cannabis industry, but for the individuals who rely on this plant for their health and wellbeing. I create content for the cannabis industry, and I have been a part of some amazing events around the country. The benefits that come from these events and lounge spaces are immense for the community, but that comes with far less restriction. If a person is able to consume this product in their home to the volume which they choose, it makes not sense why the cannabis industry would face restrictions that limit how people choose to use their own bodies. There is no restriction that limits alcohol consumption at bars or social gatherings. It is hypocritical to place restrictions on cannabis to a far tougher degree.

To specify my points, I will list the page and information in the document and explain my disagreements:

Pg. 2) Cannabis beverages should not be limited by dosing to 5mg for the same reasons I mentioned above. If alcohol (a far more dangerous consumable) is not limited to such a low margin, why does cannabis have that restriction? Not being able to consume cannabis in all forms is also restricting and preferential. Cannabis is often smoked or vaporized, and a facility should be able to allow people to consume how they want, so long as the business can maintain safety for everyone inside.

Pg. 4) Not allowing food and other specialty beverages to be prepared with THC is not going to safeguard folks from the plant. It will simply force them to unsafely attempt these things without proper guidance or assistance. If the commercial restaurant industry had more availability to hit a new market, the benefits to business and to the experiences the customers have would surely be a net gain for all parties involved including the MD State Government.

Pg. 7) Cannabis events should not be regulated, at least with the current wording and legislation looking to be placed. This does not REMOTELY define what a cannabis event is. There is not determination on how small a gathering can be where legal adults consuming cannabis stops being a gathering and becomes an "event". Until that is clarified much more properly, I don't see how we can enact laws pertaining to those events.

Beyond this, the scope of the bill is too broad in certain areas and far too definitive in others. This needs to be paused and rewritten with more input from cannabis industry members. These are systems that function amazingly in other states with nothing but benefit for the government. There is no reason why that can't be here. I hope you read this and take everything into consideration.

Thank you,

Travis Hale

Medical Cannabis Patient

Testimonial for SB215.pdf

Uploaded by: Tyshawn Ellis

Position: UNF

Position: Opposed with Amendments

Reasons for Opposition:

1. Prohibition of Safe Consumption Gatherings:

- Senate Bill 215 effectively makes it illegal to hold safe consumption gatherings in the state. This is a significant setback for public health and safety. Safe consumption spaces are crucial for reducing harm and providing a controlled environment for cannabis use. By prohibiting these gatherings, the bill ignores the benefits of harm reduction strategies that have been successful in other jurisdictions.

2. Creation of a Monopoly for License Holders:

- The bill creates a monopoly for existing license holders, shutting out small businesses and legacy players within the cannabis space. This monopolistic approach stifles competition and innovation, which are essential for a healthy and dynamic cannabis industry. Small businesses and legacy operators, who have been instrumental in building the cannabis industry, are unfairly disadvantaged by this legislation.

3. Hypocritical Criteria Compared to Alcohol:

- The criteria set forth in the bill are hypocritical when compared to the regulations governing alcohol, which is also an adult-use substance enforced by the same government office. The stringent restrictions on cannabis consumption lounges are not applied to alcohol establishments, creating an unfair double standard. This inconsistency undermines the credibility of the regulatory framework and unfairly targets cannabis consumers.

4. Restrictive Consumption Lounge Provisions:

- The consumption lounge portion of the bill is overly restrictive, limiting potential license holders and consumers alike. The stringent requirements and prohibitions on indoor smoking, among other restrictions, make it difficult for businesses to operate viable consumption lounges. This not only limits consumer choice but also hampers the growth of a sector that could provide significant economic benefits.

Proposed Amendments:

1. Allow Safe Consumption Gatherings:

- Amend the bill to allow for the establishment of safe consumption spaces where individuals can consume cannabis in a controlled and supervised environment. These spaces should be regulated to ensure public health and safety but not outright prohibited.

2. Promote Fair Competition:

- Introduce provisions that ensure fair competition within the cannabis industry. This includes creating opportunities for small businesses and legacy operators to obtain licenses and operate consumption lounges. The bill should include measures to prevent monopolistic practices and encourage a diverse and competitive market.

3. Align Cannabis Regulations with Alcohol Regulations:

- Amend the bill to align the regulations for cannabis consumption lounges with those for alcohol establishments. This includes allowing indoor smoking in designated areas, similar to how alcohol consumption is permitted in bars and restaurants. The regulatory framework should be consistent across adult-use substances to avoid unjustified disparities.

4. Reduce Restrictive Provisions for Consumption Lounges:

- Modify the bill to reduce the restrictive provisions on consumption lounges. This includes allowing for more flexible operating hours, reducing the burden of additional licensing requirements, and permitting a wider range of cannabis consumption methods. These changes will make it easier for businesses to operate consumption lounges and provide consumers with more options.

Conclusion:

Senate Bill 215, in its current form, poses significant challenges to public health, fair competition, and consumer choice. By prohibiting safe consumption gatherings, creating a monopoly for license holders, and imposing hypocritical and restrictive regulations, the bill undermines the potential benefits of a well-regulated cannabis industry. The proposed amendments aim to

address these issues by promoting harm reduction, fair competition, regulatory consistency, and consumer choice. We urge the committee to consider these amendments to create a more equitable and effective regulatory framework for cannabis in Maryland.

Thank you for the opportunity to provide testimony on this important issue.

Sincerely,

Tyshawn Eliis
Ty2001e@gmail.com

Wintess Testimony - SB215-Victoria Jonas.pdf

Uploaded by: Vicky Jonas

Position: UNF

My name is Victoria Jonas. I am a Prince George's County resident, owner of an ancillary cannabis business, and a member of the NORML community. I am here to provide testimony in opposition to Senate Bill SB215. While I respect the legislative intent behind this bill, I believe it poses significant concerns that warrant further scrutiny and consideration before proceeding.

1. Unfair Burden on Small Ancillary Cannabis Businesses: SB215 mandates state registration for all cannabis events, which disproportionately impacts small ancillary cannabis businesses. The event registration fees outlined in this bill are prohibitively high for small brands, making it difficult for them to operate fairly and compete with larger entities. Many of these businesses are already navigating a challenging regulatory landscape, and this additional financial burden could stifle their growth and limit their opportunities.

2. Prohibition of Cannabis Consumption at Events: The bill's prohibition of smoking at cannabis-friendly gatherings undermines the ability to create safe spaces for recreational cannabis use. Cannabis users are often forced to seek alternatives that may be less safe or less controlled, defeating the purpose of fostering responsible use within community events. This restriction also hampers the ability of businesses to host immersive experiences that align with consumer expectations and promote education around safe cannabis consumption.

3. Burdensome Fees and Regulations: In addition to the high event fees, SB215 introduces overly burdensome regulations that create significant barriers for small businesses and community organizers. The cumulative effect of these fees and requirements risks discouraging entrepreneurship and innovation in Maryland's growing cannabis industry. These regulations fail to strike a balance between necessary oversight and the promotion of a thriving, equitable market.

4. Economic Impact on Small Brands and Local Communities: The financial and regulatory hurdles imposed by SB215 disproportionately affect small businesses and local entrepreneurs, many of whom are already struggling to establish themselves in a competitive market. These businesses are essential to Maryland's economy and play a crucial role in fostering innovation and community engagement. By imposing these barriers, the bill risks creating an uneven playing field that favors larger, more established entities.

5. Need for Alternative Approaches: Rather than implementing the measures outlined in SB215, I urge the General Assembly to explore alternative approaches that support small businesses while maintaining necessary regulatory standards. For instance, offering tiered fee structures based on business size or event scale could reduce the financial burden on small brands. Additionally, creating clear guidelines for safe consumption spaces at events would encourage responsible use without jeopardizing public safety.

In conclusion, while I understand the intent behind SB215, I strongly believe it is not the right solution in its current form. This bill imposes unnecessary financial and regulatory barriers that hinder the growth of small ancillary cannabis businesses and limit safe recreational spaces for

cannabis consumers. I urge this committee to oppose this bill and to work collaboratively with stakeholders to develop a more balanced and effective approach.

Thank you for the opportunity to share my testimony. I am happy to answer any questions or provide further insight as needed.

Sincerely,
Victoria Jonas

victoriajonas94@gmail.com

sb215_unf.pdf

Uploaded by: Warren (Rusty) Carr

Position: UNF

SB215 Unfavorable
Warren (Rusty) Carr
4391 Moletton Drive
Mount Airy, MD 21771

I oppose SB215 and request the committee to report this bill as unfavorable.

The On-site Consumption concept originally was supposed to provide a safe place for residents of low income neighborhoods to consume Cannabis when they were not likely to be allowed to consume in their own residences. We seem to have forgotten that need. This plan for on-site consumption licenses and events only serves the wealthy.

The Cannabis community is scared that this will apply to events where they want to consume their own Cannabis. Can you assure us that this bill will have no effect on events that are open to the public where Cannabis is only shared not sold? Can you amend this bill to prohibit counties from banning events where Cannabis is only consumed (not sold) on private property?

The proposed fee structure makes small events < 1000 people too costly. The proposed event fee for retailers equates to a maximum of \$2.50/ person attending the event whether they buy any Cannabis or not. That is highway robbery. The event fee should be based on event sales.

This bill bans consumers from bringing their own Cannabis to events and bans them from taking any Cannabis they paid for at the event home with them. Who is going to enforce this and how? To borrow a phrase, this one has problems coming and going.

This bill bans smoking and vaping at Cannabis events. Smoking and vaping represent 60-70% of Cannabis consumption. That should be a red flag. Events should allow patio smoking of Cannabis in jurisdictions where tobacco smoking would otherwise be allowed.

This bill allows normal edibles to be sold at large events. This virtually guarantees hospital visits because a large number of first time users will be a certainty. Although this specific issue is easily addressed by regulation it is a red flag that the concept has not been thought through. Normal edibles have a 45-60+ minute onset time. Experienced users will not pay a premium to consume onsite when they can consume at home and not feel the effects until the game starts versus not feeling the effects until the second half or on the way home.

Dosing normal edibles is very difficult with onset times of 45 minutes to an hour. At 5mg doses, many people will need multiple servings to feel the effects. That's a recipe for people taking too much.

There are green waste concerns. Safe handling is going to be difficult, expensive and error prone. We should consider allowing consumers to take home partially consumed single dose Cannabis to reduce green waste?

This approach deviates from the alcohol model in that permits are issued at the state level instead of at the county level. I support moving the permitting process to the County level.

For all these reasons, it is clear that this concept needs more work before it can best serve the needs of the Cannabis consumer.

Thank you,
Rusty Carr

Joint Letter of Information - Cannabis On-Site Con

Uploaded by: Aleks Casper

Position: INFO



Joint Letter House Bill 132 & Senate Bill 215

January 10, 2025

Letter of Information

Chair Beidle, Vice-Chair Hayes and Members of Senate Finance Committee:

Thank you for the opportunity to provide comments on House Bill 132 and Senate Bill 215, Cannabis – On-Site Consumption Establishments and Events. The American Lung Association, American Heart Association, Campaign for Tobacco-Free Kids, and the American Cancer Society Cancer Action Network want to provide some additional information to encourage the committee to protect Maryland’s strong Clean Indoor Air Act by prohibiting the smoking and vaping of cannabis indoors as the bill is originally drafted.

Our organizations strongly believe that the smoking of cannabis should be prohibited in all places where smoking is prohibited. We continue to fight for laws and policies to make our communities in Maryland and across the country smokefree. All Americans deserve to live, work, study and play in smokefree environments. By implementing smokefree environments, all workers and patrons can be protected from the dangers of all types of secondhand smoke, including cannabis smoke.

Secondhand cannabis smoke contains many of the same toxins and carcinogens found in directly inhaled tobacco smoke. The toxins can cause lung irritation, asthma attacks, and make respiratory infections more likely. Exposure to secondhand smoke can exacerbate health problems especially for people with respiratory conditions like asthma, bronchitis, or COPD.

The U.S. Surgeon General has concluded that there is no safe level of exposure to toxic secondhand smoke.ⁱ The U.S. Surgeon General has also concluded that separating smokers from nonsmokers, cleaning the air, and ventilating buildings cannot eliminate exposure of nonsmokers to secondhand smoke. In addition, in a 2016 report, the Surgeon General concluded that secondhand e-cigarette emissions contain, “nicotine; ultrafine particles; volatile organic compounds such as benzene, which is found in car exhaust; and heavy metals, such as nickel, tin, and lead.”ⁱⁱ The only effective way to fully protect nonsmokers from exposure to secondhand smoke and aerosol is to completely eliminate smoking and vaping in indoor public spaces.ⁱⁱⁱ

As just one indication of concern about the health impact of secondhand cannabis smoke, the American Society of Heating, Refrigerating, and Air Conditioning Engineers (ASHRAE) updated its air standards to include cannabis smoke (as well as emissions from electronic smoking devices) in its definition of “environmental tobacco smoke.”^{iv} ASHRAE’s position is that the only way to effectively eliminate the health risks posed by indoor exposure to secondhand smoke is to prohibit smoking.



The American Lung Association, American Heart Association, Campaign for Tobacco-Free Kids, and the American Cancer Society Cancer Action Network, thank Maryland lawmakers for their continued commitment to the health and wellbeing of the residents of Maryland and the desire to protect Marylanders from exposure to secondhand smoke. The American Lung Association, American Heart Association, Campaign for Tobacco-Free Kids, and the American Cancer Society Cancer Action Network, encourage the committee to keep the bills as originally drafted and prohibit the smoking and vaping of cannabis indoors. If you have additional questions, please don't hesitate to contact any of us.

Sincerely,

A handwritten signature in black ink that reads "Aleks Casper".

Aleks Casper
American Lung Association
Director of Advocacy
202-719-2810
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A handwritten signature in black ink that reads "L. Hale".

Laura Hale
American Heart Association
Director of Government Relations
336-480-4829
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A handwritten signature in black ink that reads "Kristin Jimison".

Kristin Jimison
Campaign for Tobacco-Free Kids
Regional Advocacy Director
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A handwritten signature in black ink that reads "Lance Kilpatrick".

Lance Kilpatrick
American Cancer Society Cancer Action Network
Government Relations Director
410-547-2143
lance.kilpatrick@cancer.org

ⁱU.S. Department of Health and Human Services (HHS). *The Health Consequences of Involuntary Exposure to Tobacco Smoke: A Report of the Surgeon General*. U.S. Department of Health and Human Services, Centers for Disease Control and Prevention, Coordinating Center for Health Promotion, National Center for Chronic Disease Prevention and Health Promotion, Office on Smoking and Health, 2006.

ⁱⁱU.S. Department of Health and Human Services. *E-Cigarette Use Among Youth and Young Adults: A Report of the Surgeon General—Executive Summary*. Atlanta, GA: U.S. Department of Health and Human Services, Centers for Disease Control and Prevention, National Center for Chronic Disease Prevention and Health Promotion, Office on Smoking and Health, 2016.

ⁱⁱⁱHHS, 2006.

^{iv}ASHRAE. Ventilation for Acceptable Indoor Air Quality, ANSI/ASHRAE Addenda Standard 62.1-2013. [2015 Addenda Supplement to ANSI/ASHRAE Standard 62.1-2013](#)

SB 215 LOI.pdf

Uploaded by: Ariannwyn Carver

Position: INFO



Letter of Information
Senate Bill 215
Cannabis – On-Site Consumption Establishments and Events
Before the Finance Committee: January 30, 2025

The Legal Resource Center for Public Health Policy – Cannabis (“LRC-C”) is a public health organization housed at the University of Maryland Carey School of Law. Our mission is to help Maryland understand cannabis legalization policy. To advance our mission, we provide legal technical assistance, develop educational resources, and conduct trainings on cannabis policy at the state and national level. To this end, the LRC-C submits this letter of information for SB 215 to provide information regarding on-site consumption establishments and cannabis events in the few states that have authorized these types of businesses. On-site consumption establishments and cannabis events are newer cannabis business types, and there is not much data regarding their public health impacts due to their novelty.

On-Site Consumption Establishments

In 2023, the Cannabis Reform Act (“CRA”) authorized the Maryland Cannabis Administration (“MCA”) to license on-site consumption establishments to sell cannabis products to customers to consume on the business premises. Maryland’s current restrictions on cannabis consumption sites allow for the consumption of cannabis products in a variety of forms, such as smoked or vaped cannabis, edible cannabis products, and cannabis concentrates. Smoking or vaping is prohibited indoors but is permitted outdoors so long as it is out of sight of the public, such as in a walled-off courtyard or a fenced yard. SB 215 would change these options, limiting consumption sites to only single servings of edible cannabis products and eliminating the possibility of customers consuming smoked, vaped, or concentrated cannabis. It would allow consumption establishments to produce their own edible cannabis products and to function as food service facilities.

When cannabis is inhaled as smoke or vapor, the intoxicating effects are felt within minutes of consumption.¹ Inhaled cannabis effects tend to peak around thirty minutes after inhalation and then subside within 1 to 3.5 hours.² On the other hand, when cannabis products are consumed in edible form, because the THC travels through the stomach and is processed by the liver before

¹ Catherine J. Lucas et al., *The Pharmacokinetics and the Pharmacodynamics of Cannabinoids*, BRIT. J. CLINICAL PHARMACOLOGY 2477, 2478 (2018).

² National Academies of Sciences, Engineering, and Medicine, *THE HEALTH EFFECTS OF CANNABIS AND CANNABINOIDS* 51 (2017).

entering the bloodstream, it typically does not produce effects until thirty minutes to two hours after consumption, and the effects persist for five to eight hours after consumption.³

The differences in onset time and duration of cannabis effects have important traffic safety implications. Due to the dependence of many Maryland communities on automobile transportation,⁴ it is likely that a significant number of customers at consumption sites will drive to the establishment and then drive themselves home afterwards. If the cannabis is being consumed by smoking or vaping, the onset time for the effect will be similar to the experience of drinking alcohol, which is typically felt by the body within several minutes of consumption.⁵ Individuals inhaling cannabis at consumption sites, like those drinking alcohol at a bar, would feel the onset of effects as they consume, allowing them to cease consumption if they feel they are approaching their limit, or to realize quickly if they had consumed too much to drive. Individuals who consume edibles, on the other hand, may not realize they have overconsumed until an hour or two later, by which time they may have already left the consumption site. If the effects kick in while the individual is driving, the consequences could be disastrous.

Cannabis edibles can be formulated in different ways to produce different onset times. Some edibles are formulated with what is referred to as “water-soluble” THC, meaning the THC is designed to be able to dissolve in water (also referred to as hydrophilic THC).⁶ Because the mucus membranes of the mouth are able to diffuse hydrophilic substances, some amount of this “water-soluble” THC is absorbed into the bloodstream directly from the mouth, speeding up the initial experience of the drug effect, while the rest of the dosage is swallowed and metabolized by the liver like a typical edible.⁷ However, there is no robust body of evidence providing reliable data on the onset times and effect durations of these products.⁸ Without reliable, peer-reviewed studies, we cannot definitively state that such products would resolve the onset time issue. Moreover, no language within SB 215 limits consumption establishments to serving only quick-onset formulations.

Of the twelve states that have authorized cannabis consumption models, all but one authorize inhaled cannabis, subject to varying levels of restrictions by state. Only Minnesota currently utilizes an edibles-only consumption establishment model.⁹ Minnesota only authorized on-site

³ *Id.*

⁴ The United States Census Bureau’s American Community Survey 2023 5-Year Estimates Profile found that in Maryland, 74% of workers commute by automobile (66.3% alone, 7.7% carpooling). Of the remaining 26%, 17.2% work from home, leaving only 8.8% commuting by public transit, walking, or other means. Data available at <https://data.census.gov/table/ACSDP5Y2023.DP03?g=040XX00US24&tid=ACSDP5Y2023.DP03>.

⁵ *How Alcohol Affects Your Health*, HEALTH DIRECT (last accessed Jan. 24, 2025), <https://www.healthdirect.gov.au/how-alcohol-affects-your-health>.

⁶ *See, e.g.*, Kristen Nichols, *5 Strategies for Using Water Soluble Cannabinoids in Cannabis Drinks*, MJ BIZ DAILY (updated Apr. 14, 2022), <https://mjbizdaily.com/5-strategies-for-using-water-soluble-cannabinoids-in-cannabis-drinks/>.

⁷ *See, e.g.*, Lucas, *supra* note 1, at 2478 (describing oromucosal delivery of cannabis relative to inhaled and swallowed deliveries).

⁸ In researching this letter, the LRC-C identified studies regarding the absorption rates of oromucosal THC sprays and tinctures, but none involving hydrophilic preparations of THC intended to be swallowed by the consumer.

⁹ *State-by-State On-Site Consumption Laws*, MARIJUANA POLICY PROJECT (last accessed Jan. 24, 2025), <https://www.mpp.org/issues/legalization/state-by-state-on-site-consumption-laws/>.

consumption establishments in 2023. While there have been many studies examining the effect of cannabis legalization on traffic safety generally, there is no reliable evidence yet showing the effect of consumption sites specifically, nor of Minnesota's edibles-only consumption model.¹⁰

Another facet of cannabis consumption that is worth attention is the fact that, under Maryland law, cannabis consumption of any type is prohibited in public spaces.¹¹ Many Marylanders live in multifamily housing units, such as apartments and condominiums, where they either are expressly prohibited from smoking or risk exposing neighbors to unwanted secondhand smoke if they do. They are left, then, with no safe, legal space to smoke or vape cannabis. Some of these individuals are medical patients, whose medical needs may benefit from the quick onset achieved by inhaling cannabis. Consumption sites, as originally contemplated by the CRA, would provide a place for those individuals to smoke outdoors in a location that is out of public view and does not risk exposing their family and neighbors to secondhand smoke. Removing the outdoor smoking option removes that potential benefit from the consumption site model. Inversely, however, it removes the risk that consumption site employees will be exposed to secondhand cannabis smoke and vapor in outdoor consumption areas of their workplace.

Cannabis Events

SB 215 creates a new forum for cannabis sale and consumption, cannabis events. The bill defines a cannabis event as an event where the consumption of edible cannabis products is permitted. The event registration would be granted by the MCA to a person on a temporary basis. A cannabis event registration holder can host a cannabis event and can: (1) allow attendees to bring their own cannabis edible products and consume them on-site, (2) allow attendees to acquire or purchase a cannabinoid beverage, or (3) allow permitted cannabis vendors to sell cannabis products at the event. This would be a new registration type in Maryland and, unlike on-site consumption establishments, was not contemplated by the 2023 CRA. As cannabis events were not contemplated by the CRA, the MCA has not published a report to compare the different models of cannabis events in states that have authorized them, as it did in the context of consumption establishments.¹²

Twenty-four states and Washington D.C. have legalized adult-use cannabis consumption.¹³ Of these twenty-four states, only five (California, Maine, Michigan, Minnesota, and New York) have explicitly authorized cannabis events.¹⁴ Maryland would become the sixth state to explicitly authorize cannabis events. In all five states that allow cannabis events, a cannabis license holder (cannabis dispensary, processor, etc.) can obtain a cannabis event registration or license.¹⁵ SB

¹⁰ See generally Ernesto Londoño, *As Marijuana Use Grows, Effect on Road Safety Remains a Blind Spot*, N.Y. TIMES (Jan. 1, 2025), <https://www.nytimes.com/2025/01/01/us/marijuana-driving-impairment.html>.

¹¹ MD. CODE ANN. CRIM. LAW § 5-601(c)(4).

¹² Maryland Cannabis Administration, REPORT ON ON-SITE CONSUMPTION ESTABLISHMENTS (2024), [https://dlslibrary.state.md.us/publications/Exec/MCA/SB516Ch255HB556Ch254\(14\)\(2023\).pdf](https://dlslibrary.state.md.us/publications/Exec/MCA/SB516Ch255HB556Ch254(14)(2023).pdf).

¹³ Kate Bryan, *Cannabis Overview*, NATIONAL CONFERENCE OF STATE LEGISLATURES (updated Jun. 20, 2024), <https://www.ncsl.org/civil-and-criminal-justice/cannabis-overview>.

¹⁴ CAL. CODE REGS. tit. 4, § 15600; 28-B M.R.S.A. § 504-A; MICH. ADMIN. CODE R § 420.21; M.S.A. § 342.39; 9 NYCRR § 120.19.

¹⁵ CAL. CODE REGS. tit. 4, § 15600; 28-B M.R.S.A. § 504-A; MICH. ADMIN. CODE R § 420.24; M.S.A. § 342.39; 9 NYCRR § 120.19.

215 would not allow a cannabis licensee to hold the cannabis event registration, though cannabis licensees are allowed to be cannabis vendors at events.

In three of five states (CA, MI, and MN), on-site consumption of cannabis is allowed at all cannabis events.¹⁶ New York only allows on-site consumption of cannabis at events if the business hosting the event also has a cannabis on-site consumption endorsement or license.¹⁷ By contrast, Maine does not allow any on-site consumption of cannabis.¹⁸ In the four states that allow on-site consumption of cannabis at cannabis events, the use of cannabis must be done within a section of the event restricted to individuals twenty-one years of age and older.¹⁹

By contrast, SB 215 departs from this trend, and would allow on-site consumption of edible cannabis products at all cannabis events and in all spaces. At cannabis events that allow people to bring their own cannabis or that sell cannabinoid beverages, individuals under twenty-one would be allowed in areas where cannabis is being sold and consumed. Age restrictions only apply to events that host permitted cannabis vendors.

Furthermore, since cannabis events are a novel type of event, there is no data regarding the public health impacts of these events nor is there data regarding the success and viability of these events. Even if other states had collected data on the impact of cannabis events, no other state allows individuals under twenty-one in areas where cannabis consumption is allowed, and we do not have data on how that would affect youth perception of and access to cannabis.

Conclusion

On-site consumption establishments and cannabis events are comparatively new cannabis business types and, consequently, it is uncertain what impact these businesses will have on public health.

The Legal Resource Center appreciates the opportunity to provide this letter of information. Should you wish to discuss the information in this letter or require additional information, please contact us.

Sincerely,

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¹⁶ CAL. CODE REGS. tit. 4, § 15603; MICH. ADMIN. CODE R § 420.25; M.S.A. § 342.40.

¹⁷ 9 NYCRR § 120.19.

¹⁸ 28-B M.R.S.A. § 504-A.

¹⁹ CAL. CODE REGS. tit. 4, § 15603; MICH. ADMIN. CODE R § 420.25; M.S.A. § 342.40; 9 NYCRR § 120.19.

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SB 215 - LOI.pdf

Uploaded by: Matthew Dudzic

Position: INFO

Letter of Information**Senate Bill 215 – Cannabis – On-Site Consumption Establishments and Cannabis Events**
Finance Committee
January 30, 2025

The Office of the Comptroller is respectfully submitting this letter of information for Senate Bill 205 (SB205), Cannabis – On-Site Consumption Establishments and Cannabis Events. SB205 establishes licensing, restrictions, and guidelines for cannabis events and on-site consumption establishments. The Office of the Comptroller suggests the following two amendments for consideration by the Maryland Cannabis Administration and the Committee:

1. Require each vendor to submit separate SUT forms for each event. The sales and use tax (SUT) form for cannabis retailers currently requires them to report their location so that the revenue can be distributed to the correct jurisdiction, and they cannot combine sales from different locations on a separate SUT form. Under SB205, the cannabis sold at a cannabis event is sourced to the location of the event for purposes of revenue distribution. We recommend adding a requirement that each licensed cannabis vendor at a cannabis event must submit a separate SUT form reporting their sales and SUT collected for each event. This will assist us with properly tracking the SUT and distributing its revenue correctly.

2. Ensure that cannabinoid beverages are taxed as cannabis, not food. To avoid ambiguity, we recommend clarifying that cannabinoid beverages should be taxed as cannabis, and should not be considered food items and therefore exempt from SUT. This can be accomplished by adding “a cannabinoid beverage as defined in § 36-101 of the Alcoholic Beverages and Cannabis Article” to Tax General Article § 11-206(a)(3)(iii),

Thank you for your consideration of these amendments. As always, the Office of the Comptroller is eager to discuss these concerns or answer any questions at your convenience. Please feel free to reach out to Matthew Dudzic, Director of State Affairs, at MDudzic@marylandtaxes.gov.



Senate Testimony_SB215 - INF.pdf

Uploaded by: Obie Chinemere

Position: INFO



Curio Wellness Written Comments
SB0215 Hearing – Thursday, January 30, 2025

Founded and based in Maryland, [Curio Wellness](#) is a family-owned and operated cGMP certified cannabis company and trusted wellness partner. We're dedicated to increasing the accessibility of high-quality cannabis to the growing population of citizens who seek safe, effective, and reliable products. Available in over 90 dispensaries across Maryland, our focus on innovative and high-quality products and services has made Curio a market leader in Maryland. Moreover, as an organization, Curio knows that a diverse and inclusive workforce creates an optimum workplace that attracts and retains talented employees and loyal customers. In fact, this commitment to diversity has been present since inception with Curio's inaugural leadership team comprising a multi-racial group of men and women. As the company has grown, so has its focus on a diverse team of workers and leaders. Overall, 40% of the Curio Wellness workforce is female and 44% identifies as Black, Hispanic, Asian, American Indian or Alaska Native, or multi-racial. Among management, 39% are female and 27% identify as Black, Hispanic, or multi-racial.

We appreciate the efforts of the Maryland Senate and House over the last several years, crafting legislation of this nature is undoubtedly challenging, and we recognize the nuance and balance needed to address the plethora of industry-related stakeholders. Therefore, we'd like to take this opportunity to address the proposed cannabis reform and its impact on consumers, businesses, and public safety. As operators, deeply engaged in the cannabis community, we urge this body to consider three key points of concern and offer constructive feedback to improve this important piece of legislation.

- 1. Potency Restrictions on Existing Beverage Products:** The current potency restrictions on cannabis-infused beverages, referred to as Liquid Edibles, are set at 10mg THC per serving and products are only available in single serving packages. The proposed inclusion of a "Cannabinoid Beverage" maintains the single serve product specification while decreasing the potency to 5mg of THC per serving. While it is essential to regulate and ensure the safety of cannabis products, the potency cap on beverages does not align with industry trends, consumer preferences, or the responsible use of cannabis. Consumers today are looking for more choice and flexibility, much like they would in any other beverage market. Limiting the potency of cannabis drinks restricts those consumers who wish to have a more controlled experience, whether it's for relaxation, therapeutic use, or simply to enjoy cannabis in a social setting.

Maintaining existing potency limits, while still ensuring strict testing and safety standards, will not only encourage innovation but also foster a more competitive, consumer-focused market. We strongly encourage you to reconsider the current potency caps and raise them to levels that allow for a broader range of beverage products, while ensuring all products meet rigorous safety testing.

2. On-Site Consumption Lounge Licenses and the Danger of Backdooring Processing Operations:

Another concern worthy of highlighting is the current proposal of on-site consumption lounge licenses being used as a backdoor method for obtaining processor licenses. While on-site consumption lounges may be an addition to the cannabis landscape, allowing consumers to gather and enjoy cannabis in a safe and legal environment, there are serious public safety risks when consumption lounge operators also gain the ability to process cannabis.

Processing cannabis—especially through methods that involve volatile and highly flammable substances like hydrocarbons—poses significant safety risks. Extraction methods such as butane hash oil (BHO) or other hydrocarbon-based techniques require precise control and adherence to strict safety protocols to avoid catastrophic accidents, including explosions, fires, and chemical exposures. [Dangerous events like this have already occurred in our own state as recent as this month.](#) Allowing consumption lounge operators, who may not be experienced or equipped to handle the risks of extraction and processing, to also be involved in these high-risk activities jeopardizes the safety of both workers, patients, consumers, and the surrounding community.

Moreover, the ability to process cannabis while also running a consumption lounge creates an unlevel playing field for new, independent processors. These new operators—who may be working hard to meet regulatory standards and build relationships with retailers—are forced to compete against businesses that have direct access to consumers through their lounges. This gives those lounge-processor hybrids an unfair advantage, as they can market their products directly to the people consuming them, potentially circumventing the traditional retail channels. This diminishes opportunities for new processors, restricts healthy market competition, and threatens the stability of smaller cannabis businesses that are already operating under significant financial constraints.

The combination of direct consumer access and processing ability could lead to market consolidation where larger players have an unfair edge over smaller businesses, undermining the spirit of the cannabis industry. It is crucial to recognize that while business innovation and growth should be encouraged, this must not come at the expense of safety or fair competition.



We strongly urge the separation of the licensing for consumption lounges from that of processors. If a business wants to enter the cannabis processing space, it should undergo the rigorous safety, operational, and regulatory scrutiny required for processing—separate from the responsibilities and standards of a consumption lounge. This will not only protect public safety but also ensure a level playing field for all businesses, allowing new processors to compete fairly without the added pressure of facing entrenched competitors with built-in consumer bases.

The risks of combining these operations are simply too great, and the negative impact on fair competition in the industry must not be underestimated. Ensuring that processing and lounge operations are distinctly regulated and separated is essential to fostering both a safe and equitable cannabis market.

3. Cannabis Event Vendor Permits and Licensing Flexibility: Finally, we strongly support efforts to allow vendor permits for cannabis events to be accessible to any licensed cannabis business, not just specific license types. This flexibility would encourage a more inclusive and diverse range of participants in cannabis events, from cultivators to retailers, processors, and ancillary businesses. Allowing any licensee to participate, as long as they adhere to the appropriate regulations, ensures that cannabis events are not artificially restricted to a narrow pool of businesses.

Such an approach fosters healthy competition, promotes innovation, and supports small businesses that might otherwise struggle to get involved in larger events. By removing unnecessary restrictions and allowing all licensed cannabis businesses to engage in the event marketplace, we will create a more dynamic and vibrant industry. It will also provide consumers with more variety and more opportunities to connect directly with the producers and brands they trust.

However, we must also address a critical concern regarding penalties for violations of cannabis event regulations. The current penalties for non-compliance are far too low to incentivize proper adherence to the rules, and they risk being seen as a mere cost of doing business. This creates a serious loophole where businesses, especially those with less integrity, may feel encouraged to exploit these lax penalties by bending or even ignoring regulations altogether.

We've seen this happen in other legal cannabis markets, like California & Nevada, where low penalties for violations have contributed to a rise in illicit activity. In some cases, non-compliant operators see fines as a minor expense compared to the profits made from operating outside the law. This undermines the integrity of the entire legal cannabis market, creates unfair competition for those who follow the rules, and compromises public safety.



To prevent this from happening, we urge this legislature to consider revising the penalty structure for violations, making it more stringent and meaningful that reflect the seriousness of non-compliance. As it applies to not only this bill, but also Senate bill 214 and the 2023 Cannabis Reform Act. The negative influence and infiltration of intoxicating hemp products was nowhere near its realization at the time of 2023 Act and today is a nationwide public health and safety crisis with states across the country taking aggressive steps to outlaw and keep adults and children safe. Here in Maryland, we see proliferation of businesses selling these products, in addition to illicit dispensary operations. With clear consequences and measures to ensure future illicit activities are restrained. Only with a robust and enforced penalty system can we ensure that the integrity of the legal market is preserved, and that consumers are protected from unsafe, unregulated products and practices. By aligning penalties with the importance of compliance, we can help curb illicit activity, protect legitimate businesses, and further promote a fair and sustainable cannabis marketplace.

We urge this body to reconsider the current limits on beverage potency, take appropriate action to separate on-site consumption lounges from cannabis processing operations, and allow for greater flexibility in participation at cannabis events while ensuring stringent and meaningful penalties for non-compliance. The overall goal should be to foster a cannabis marketplace that prioritizes safety, consumer choice, and industry innovation while continuing to protect public health and welfare.

For more information, please contact:

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