

Testimony of the Maryland Advisory Board on Medical and Adult-Use Cannabis

Bill: SB 594

Committee: Senate Finance Committee

Date: February 26, 2026

Position: Support with Amendments

Madam Chair and Members of the Senate Finance Committee:

The **Maryland Cannabis Advisory Board** respectfully offers **Support with Amendments** for **SB 594** because the bill moves Maryland toward a **more workable, enforceable approach to public-facing cannabis communications—an issue the Board identified** before SB 594 was introduced **as a structural barrier to a safe, transparent, and well-functioning regulated market**. Under current practice, public-facing communications rules have become so constrained that routine, responsible engagement with adult consumers, patients, and communities is effectively shut down. That constraint is not merely a business concern. It limits consumer education and growth of the medical cannabis program, reduces the visibility of compliant, age-gated operators, and leaves an information vacuum that unregulated actors can fill. We believe if this wasn't the cannabis industry, we would not see this degree of prescription, as we don't see this degree of instruction in alcohol or any other industry. This creates barriers to operate for both new and existing operators in an industry we are actively trying to destigmatize.

In its December 8, 2025 memorandum, the Board urged the General Assembly to revisit the regulatory framework governing public-facing communications and consumer education to restore a model more consistent with Maryland's successful medical program—one that allows responsible, age-appropriate outreach across modern channels with clear and workable standards. **The Board also emphasized that public education cannot be carried by government and public health agencies alone; a safe, informed market requires coordinated effort** among the State, regulators, public health experts, and licensed operators - **who are positioned to communicate directly with adults about product safety, dosing, responsible use, and why purchasing from regulated businesses matters.**

Against that backdrop, **SB 594's direction is constructive**. The bill attempts to replace subjective, hard-to-administer standards with clearer guardrails, including by tightening how "targeting minors" is evaluated and focusing on clearly youth-oriented depictions. **The Board agrees with the policy objective: protect youth through objective, enforceable rules while allowing responsible adult-facing communication that supports consumer education and market transparency.**

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The Board’s amendments focus on ensuring SB 594 does not inadvertently recreate the same problem it is trying to solve—namely, replacing one form of restriction with another that is overly prescriptive, hard to interpret, or easy to tighten over time without transparency.

Two areas warrant particular attention:

1) Exterior signage should rely on objective prohibitions, not a narrow statutory checklist.

SB 594 includes detailed exterior signage requirements, including an “allowed content” approach. **The Board’s guidance is that Maryland should pursue a “policy reset” in communications**—content safeguards, youth protections, and transparency—rather than a structure that functions in practice like a de facto ban. A rigid checklist risks becoming outdated quickly and can produce compliance uncertainty even when the underlying public-health goal is appropriate. **The Board recommends removing and replacing the prescribed list and size parameters list with signage rules consistent with that of the medical cannabis framework:** no youth-targeting imagery, no false or misleading claims, and no obscene content— when paired with fair enforcement practices, this is a far more sustainable and equitable approach.

2) IF the bill requires an “alternative method” for audience composition, it should be clearly bounded.

SB 594 contemplates audience composition compliance grounded in data from the advertising medium but also **directs MCA to adopt an “alternative method” for determining audience composition.** The Board’s broader implementation principle is predictability: Maryland should adopt “smart, predictable, and service-oriented oversight,” treating compliant operators as partners in achieving public health and safety objectives. **An open-ended alternative methodology**—without clear parameters—**risks becoming a moving target that chills lawful adult communications over time.** The Board **recommends either removing that requirement or specifying limits:** any alternative method should be objective, publicly explainable, and **not more restrictive than the baseline statutory standard;** it should also be implemented only after clear public guidance and stakeholder input.

Finally, the Board urges the Committee to pair SB 594 with implementation expectations that support consistent statewide administration. The Advisory Board has recommended a “regulation through partnership” model, including practical tools such as dedicated help

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lines/office hours, timeliness benchmarks for agency interpretations, and recurring public roundtables to identify compliance friction before it becomes enforcement driven. SB 594's success will depend not only on statutory text, but on whether licensees and regulators share a clear understanding of what is permitted, what is prohibited, and how questions are resolved.

Requested amendments / committee direction (priority):

- Remove any statutory exterior signage content checklist and align exterior signage with enforceable standards akin to the medical cannabis framework.
- Remove or bound any "alternative method" for audience composition so it cannot become an unbounded discretionary constraint; require public guidance and stakeholder input before implementation.
- Direct MCA/ATCC to publish plain-language guidance and examples before enforcement, consistent with a partnership-based oversight model.

The Maryland Cannabis Advisory Board appreciates the Committee's continued leadership on smart, workable cannabis policy and stands ready to provide technical assistance on implementation design, so SB 594 achieves its purpose: clearer standards, strong youth protections, and responsible adult-facing communication that supports a safe, transparent, regulated market.

Sincerely,

Maryland Cannabis Advisory Board

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