

BULLETIN: 2019 – 015
Effective Date: November 26, 2019

Medical Cannabis-Infused Product Administrative Review Process

Linthicum, MD (November 26, 2019) – The Maryland Medical Cannabis Commission (the “Commission”) is issuing this bulletin to inform all medical cannabis businesses of a forthcoming administrative process to ensure medical cannabis-infused products comply with packaging and labeling requirements established in the Code of Maryland Regulations (COMAR), Title 10, Subtitle 62. In addition, the Commission is requesting information on data to support (1) product expiration dating and (2) product validation processes.

Packaging and Labeling

COMAR 10.62.24 and 10.62.29 establish packaging and labeling requirements for medical cannabis finished products. In order to ensure products comply with these requirements, effective November 26, 2019, each new medical cannabis-infused product entered into METRC must be accompanied by an image of any packaging and labeling materials, and for non-liquid products, images of the cannabis product. Images may be sent to metrcnotifications.mmcc@maryland.gov. No medical cannabis-infused product may be approved for distribution unless the licensed processor submits images of the packaging and labeling for review and approval. The Commission anticipates reviewing each medical cannabis-infused product within 14 calendar days of submission.

Expiration Dating and Validation Processes

COMAR 10.62.24.01.B(4) requires that each medical cannabis-infused product bear a finished-product lot number and an expiration date, and COMAR 10.62.23.02.A(4) mandates that a licensed processor shall “carry out a validation process on the first 10 lots of any new medical cannabis concentrate, medical cannabis-infused product, or process, to establish the validity of the production process.” The Commission is interested in gathering data on medical cannabis-infused product stability and encourages licensees to submit any applicable expiration data and/or validation process data or test results. Supporting evidence may include stability/challenge studies conducted with similar cannabis-infused or non-cannabis-infused products, stability/challenge studies licensed processors have conducted with the actual product, or any relevant peer-reviewed literature. Information may be sent to metrcnotifications.mmcc@maryland.gov.

This bulletin does not change, remove, or replace any existing regulations under COMAR 10.62.

The Commission thanks you for your cooperation and dedication to ensuring the safety of medical cannabis patients. Questions may be submitted to metrcnotifications.mmcc@maryland.gov.