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House Bill 1243 - Cannabis Licensing and Registration - Use of Straw Ownership – Prohibition

OPPOSE

Carrington & Associates, LLC writes to express their clients' opposition to House Bill 1243, which proposes significant amendments to cannabis packaging requirements in Maryland.

While we acknowledge the importance of responsible cannabis regulation, we believe that certain provisions within HB1243 impose unnecessary restrictions on the industry, hindering their ability to operate effectively. Their key points of opposition are as follows:

1. **Excessive Packaging Regulations:** The bill grants extensive authority to the Administration to regulate the potency and packaging of cannabis products. While we support reasonable safety measures, the proposed restrictions go beyond industry standards and could result in excessive packaging, contributing to environmental concerns and increased costs for businesses.
2. **Limitations on Labeling and Branding:** The bill's stringent limitations on labeling and branding, particularly the prohibition on certain images, unfairly restrict their ability to communicate with consumers. This limitation compromises their freedom of expression and hampers their capacity to differentiate their products responsibly in a competitive market.
3. **Prohibition on Purchasing Empty Packaging:** The prohibition on the purchase of empty packaging poses an undue burden on cannabis license holders. This restriction limits their ability to choose cost-effective and environmentally friendly packaging options, potentially driving up operational expenses.
4. **Lack of Industry Consultation:** We regret that despite their best efforts, we were unable to secure a meeting with Delegate Miller before the hearing. We believe that meaningful industry consultation is essential during the drafting of this legislation. In order to create effective and fair regulations, it is imperative that policymakers engage with industry stakeholders to gain insights into the practical implications of proposed measures.
5. **Impact on Small Businesses:** The proposed regulations disproportionately impact small and emerging businesses within the cannabis industry. The additional costs associated with compliance could pose a significant challenge for smaller enterprises, hindering their growth and competitiveness.

In light of these concerns, we respectfully urge you to reconsider the provisions outlined in House Bill 1243. We believe that a collaborative approach, involving stakeholders from the cannabis industry, can lead to more balanced and effective regulations.

Thank you for your attention to this matter. We are open to engaging in further discussions to find common ground and ensure that any regulatory measures are fair, practical, and beneficial for all parties involved.

Please do not hesitate to contact Darrell Carrington, Founding Board Member and former Executive Director of the Maryland Cannabis Industry Association (MDCIA), at 732-763-7398 or darrell.carrington@verizon.net.