COLORADO
Department of Revenue
Marijuana Enforcement Division

December 23, 2025

Industry Bulletin: 25-17

RE: Executive Order: "Increasing Medical Marijuana and Cannabidiol Research"

On Thursday, December 18, 2025, President Trump issued an Executive Order, titled "Increasing Medical Marijuana And Cannabidiol Research." The Marijuana Enforcement Division (MED) is issuing this bulletin to support a shared understanding on the details of Executive Order (EO) and what the issuance of the EO does and does not mean for Colorado's regulatory program. With a lot of information being circulated about the EO, licensees are encouraged to review the contents of the Executive Order (Order or EO) before making conclusions about impacts to their business, and should consult with qualified legal counsel to maximize their preparation for the Order's potential future impacts.

- The EO directs the Attorney General to complete, as expeditiously as possible, the previously initiated process to reschedule cannabis from Schedule I to Schedule III. While the EO outlines a path forward, it is important to note that the rescheduling of marijuana is a process, and the Order does not immediately impact the federal status of marijuana under Schedule I, nor does it create any immediate disruption to Colorado's regulated marijuana program.
- The EO directs federal administration staff to work with Congress to update the statutory definition of final hemp-derived cannabinoid products, which may include developing a regulatory framework for hemp-derived cannabinoid products, and guidance on an upper limit on milligrams of THC per serving, with considerations for per container limits and CBD to THC ratio requirements.
- The Order does **not** immediately reschedule marijuana, which means regulated marijuana business licensees in Colorado remain subject to all state requirements under the Colorado Marijuana Code, at sections 44-10-101 *et seq.*, C.R.S., and Colorado Marijuana Rules, at 1 CCR 212-3.

As a member of the Cannabis Regulators Association (CANNRA), an international nonpartisan association of government agencies regulating cannabis and cannabinoids, the MED is sharing this CANNRA briefing document as an additional resource regarding the EO and implications of rescheduling.

The MED's leadership team is diligently monitoring the next steps the federal government will take to effectuate the directives of the EO, which we expect to inform future communications. We look forward to gaining more details as that process unfolds, which will allow us to offer more clarity to licensees regarding any identified impacts to the state's regulated framework.