

Federal Implementation Ask

A one-page summary of the policy architecture WRCL is advocating.

Staff Briefings • Audience: Public / Staff / Partner • Draft v2.1 • whole-plant framework



What this resource does: *States the minimum legislative framework WRCL expects Congress to incorporate in any genuine cannabis reform effort.*

Minimum statutory elements

- Deschedule cannabis and naturally occurring cannabinoids, instead of moving the plant to a different schedule while keeping core contradictions.
- Replace the hemp/marijuana division with a comprehensive framework that classifies products by intended use and risk: adult-use, medical, and hemp/industrial categories.
- Distribute front-end responsibilities among existing agencies or establish a new agency to cover product safety, agriculture, tax and trade, finance, and enforcement.
- Authorize lawful interstate commerce through a phased implementation plan linked to federal baseline standards.
- Normalize banking, payment systems, and standard commercial practices.
- Develop a medical access and reimbursement strategy, not just a research commitment.
- Incorporate repair and social equity measures with effective implementation mechanisms.
- Guide the federal government in creating and executing a treaty-alignment strategy with an inter se pathway as the preferred option.

Implementation posture

- Flexibility at federal, state, and tribal levels above the minimum requirements.
- Product traceability at lot- and batch-level where necessary, without enforcing a universal plant-by-plant mandate unless justified.
- Distinct separation between industrial hemp standards and those for intoxicating finished products, avoiding contradictions at the plant level.
- Robust public health and anti-diversion measures that uphold both domestic legitimacy and international credibility.

WRCL's message discipline

No half measures. No contradictions at the federal level. No vague alignment language. The request is for full implementation.

Selected source basis

FDA regulation of Cannabis and cannabis-derived products — Current FDA baseline for THC/CBD in foods, supplements, cosmetics, and approved drugs. <https://www.fda.gov/news-events/public-health-focus/fda-regulation-cannabis-and-cannabis-derived-products-including-cannabidiol-cbd>

CANNRA: Considerations for federal hemp regulation — State-regulator view on hemp-derived cannabinoid gaps and needed federal floor standards. <https://www.cann-ra.org/s/Considerations-for-Federal-Hemp-Regulation-April-2023.pdf>

Single Convention on Narcotic Drugs, 1961, as amended — Treaty baseline, including Article 28(2) industrial-hemp carveout. <https://treaties.un.org/doc/Publication/UNTS/Volume%20976/volume-976-I-14152-English.pdf>

Vienna Convention on the Law of Treaties, Article 41 — Primary legal basis for an inter se modification strategy.

https://legal.un.org/ilc/texts/instruments/english/conventions/1_1_1969.pdf

Strategies 64: The One-Plant Solution — Recent whole-plant framework proposal and useful strategic comparator.

<https://img1.wsimg.com/blobby/go/c3867b8d-9e34-48c6-9bda-231afbb4b7b9/downloads/911e85c7-e17d-44f9-9222-36918fa14adb/the-one-plant-solution.pdf?ver=1770546959970>