

Agency-Role Chart

A proposed split of responsibilities across federal agencies.

Whole-Plant Federal Framework • Audience: Public / Staff / Partner • Draft v2.1 • whole-plant framework



What this resource does: *Demonstrates how a comprehensive federal framework could be managed without assuming that one existing agency already covers every aspect of the problem.*

Design note

WRCL's goal isn't just to rename an enforcement bureau and call it a day. A comprehensive legal economy for whole-plant products requires a front-end regulatory framework, including an agriculture lane, a tax and trade lane, a medical lane, a strategy for financial normalization, and a back-end enforcement mechanism for diversion and fraud. That means front-end rulemaking should be managed by agencies with expertise in agriculture, product safety, medical claims, tax and trade, and financial normalization. DOJ and ATF-like functions serve as back-end enforcement layers, not as the primary regulators of the market.

Recommended federal split

Agency or actor	Recommended role	What it should not own alone	First 180-day deliverables
Congress	Establish the legal framework, product categories, federal baseline, and treaty directive.	Daily technical rulemaking details.	Enact descheduling, lane definitions, agency authorities, trade, finance, repair, and treaty title.
FDA / HHS	Supervise product safety, claims, medical devices, manufacturing standards, adverse events, and specific finished-product regulations.	Industrial hemp agriculture or tax/trade administration.	Initial development of regulations for cannabinoid products, medical guidance, safety reporting, and recall systems.
Treasury / TTB	Administer permits, taxes, and trade, along with formulas and labels where required, as well as maintaining records and overseeing interstate commercial administration.	Clinical claims, agricultural crop oversight, or general criminal enforcement.	Permit structure, tax-event design, trade records, label or formula review rules, interstate clearing, and audit rules.
USDA	Manage systems for crop, seed, grain, fiber, agricultural hemp, and related products for producers.	Retail finished-product safety for cannabinoid products.	Updated regulations for hemp cultivation, support for industrial hemp, plant definitions, and coordination of agricultural data.
DOJ / ATF-like enforcement	Target illegal diversion, trafficking, contraband, tax fraud, and noncompliant interstate activities.	Lead rulemaking for legal finished-product markets.	Diversion and fraud priorities, criminal backstop, and interagency enforcement protocols.
FinCEN and banking regulators	Standardize compliance expectations for legal Cannabis businesses and remove cannabis-specific obstacles as federal illegality is lifted.	Primary product regulation.	Updated guidance on financial crime, suspicious activity expectations, and bank examination procedures.
CMS / federal health programs	Develop the coverage and reimbursement strategy for the medical lane.	General rules for the adult-use market.	Coverage analysis, oncology and palliative access planning, and program guidance for federally lawful medical products.
State Department / USTR / DOJ / HHS / Treasury	Develop and execute treaty alignment.	General domestic product-safety administration.	Treaty strategy, partner mapping, international briefings, and annual updates.

Selected source basis

About the Alcohol and Tobacco Tax and Trade Bureau — Current TTB mission and tax/trade enforcement role.
<https://www.ttb.gov/about-ttb>

FDA tobacco manufacturing obligations — Registration, listing, and labeling baseline for comparison.
<https://www.fda.gov/tobacco-products/compliance-enforcement-training/manufacturing>

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>

USDA hemp program overview — Current USDA cultivation, sampling, testing, and licensing baseline.
<https://www.usda.gov/farming-and-ranching/plants-and-crops/plant-breeding/hemp>

CMS Medicare Part D Manual, Chapter 6 — Current Part D coverage rules for prescription drugs used for medically accepted indications. <https://www.cms.gov/medicare/prescription-drug-coverage/prescriptiondrugcovcontra/downloads/part-d-benefits-manual-chapter-6.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>