

# Interstate Commerce Memo

A framework for lawful state-to-state commerce.

Commerce and Finance • Audience: Public / Staff / Partner • Draft v2.1 • whole-plant framework



**What this resource does:** *Outlines how a future lawful interstate Cannabis economy could work without repeating today's contradictions or destabilizing implementation.*

## Why interstate commerce matters

A legal economy that cannot move goods, capital, data, and compliance records across state lines remains only partially legal. WRCL considers interstate commerce as part of the core implementation framework, not a reward given to states that survive the transition.

## Preconditions for interstate trade

- A federal baseline for product standards, labeling, testing, and recalls.
- Licensing and record-keeping systems that enable regulators to identify who is shipping what and under what regulations.
- A framework for transport and receiving that respects state choices while enabling participating states to trade lawfully.
- Tax and revenue rules that clearly specify taxable events and indicate state and federal shares where applicable.
- A settlement model that allows participating states to maintain their own state-based, state-managed revenue collection while adhering to shared compliance and reporting standards.
- Digital data standards for lot, batch, package, tax, and recall information.

## Possible staged model

Phase	What opens	What must already be in place
1	Industrial hemp and noncontroversial agricultural commerce continue within existing legal frameworks.	USDA-facing agricultural treatment and clear distinctions for finished products.
2	Interstate travel for adult-use or cannabinoid-legal states commences according to federal standards.	Federal floor standards, compliant participants, data sharing, and enforcement rules.
3	Broader interstate adult-use commerce expands.	Auditing, revenue settlement, recall systems, and more transparent state-to-state recognition rules.
4	Cross-border trade among similar countries becomes a future possibility only after domestic and treaty conditions permit it.	Domestic framework complete; treaty-alignment process underway; participating partners aligned.

## Digital infrastructure note

A national system doesn't need to replicate each state's seed-to-sale model. Instead, a better approach is an interoperable digital standards layer that manages licensing, lot and batch data, package identifiers where necessary, tax events, recalls, and state-to-state settlements. Think of it as a trade-and-compliance utility rather than just a plant tracker. An effective analogy is a multistate clearinghouse: participating states retain their own legal authority and revenue claims while sharing data, settlement processes, and audit procedures.

## Key policy caution

Interstate commerce should not be structured in a way that harms small operators, social equity businesses, or legitimate industrial hemp participants. A comprehensive implementation framework must combine market opening with fair transition planning.

## Selected source basis

**FDA Drug Supply Chain Security Act (DSCSA)** — Package-level digital traceability model relevant to Cannabis product tracking design. <https://www.fda.gov/drugs/drug-supply-chain-integrity/drug-supply-chain-security-act-dscsa>

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

**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>

**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>

**Constitution Annotated: Compact Clause** — Official overview of interstate compact mechanics and congressional consent. [https://constitution.congress.gov/browse/essay/artI-S10-C3-3-1/ALDE\\_00013531/](https://constitution.congress.gov/browse/essay/artI-S10-C3-3-1/ALDE_00013531/)

**Multi-State Lottery Association** — Example of a multijurisdictional state-participation and settlement model. <https://www.musl.com/>