

Whole-Plant Framework Memo

A plain-English explanation of how WRCL's full legal framework works.

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



What this resource does: Explains the core design principles behind WRCL's whole-plant approach so readers understand why one plant can still have different regulatory lanes.

Core design rule

WRCL's stance is not "one plant, one identical rulebook." It is "one plant, one coherent legal foundation." This legal foundation should stop dividing Cannabis into conflicting plant-source categories, while downstream regulation can still vary based on intended use, route of administration, and public health risk.

Five design principles

- **Source-neutral.** Federal law should stop linking legality to whether a finished product traces back to a hemp or marijuana label when the plant species is the same.
- **Lane-based.** Finished products should be routed into adult-use, medical, or hemp/industrial categories with rules proportional to risk.
- **Federal floor plus state flexibility.** Congress should establish minimum national standards while allowing for stricter rules at the state and tribal levels.
- **Ordinary commerce.** A legal economy requires interstate trade, tax and trade systems, banking, and payment infrastructures.
- **International durability.** The domestic framework should be complemented by a treaty strategy rather than leaving diplomacy to chance.

The three downstream lanes

Lane	Examples	Primary rule concerns
Adult-use	Flower, inhalables, edibles, beverages, concentrates, and other intoxicating consumer products.	Age gates, serving sizes, packaging, labeling, testing, marketing restrictions, tax and trade regulations, interstate controls.
Medical	Prescription or clinician-supervised products, specialized formulations, therapeutic claims, oncology, and palliative care products.	Research, quality standards, clinician protection, claims, dosage forms, patient access, and coverage pathways.
Hemp / industrial	Fiber, seeds, grains, feed, food ingredients, biomaterials, and non-intoxicating uses.	Cultivation, agricultural practices, manufacturing inputs, food and feed regulations, and distinctions for finished cannabinoid products.

Cross-cutting infrastructure

- Registration and licensing categories that align with the actual supply chain.
- Testing, recordkeeping, recalls, and adverse-event reporting appropriate for product type.
- Tax and trade rules that are clear to ordinary businesses and regulators.
- A data and traceability system designed around lot, batch, and package risk rather than reactive plant-by-plant tracking.
- Repair and equity tools that apply across both adult-use and hemp-derived commercial opportunities.

Why this is better than partial reform

- It eliminates the incentive to exploit definitional loopholes instead of building compliant businesses.
- It secures a stable place for industrial hemp within national policy rather than leaving it subject to cannabinoid disputes.
- It creates a dedicated path for medical access instead of forcing all therapeutic questions into adult-use or supplement frameworks.
- It enables Congress to establish a comprehensive structure instead of patching contradictions over time.

How to use this memo

Use this as a plain-English reference document when introducing WRCL to staff, regulators, hemp leaders, or potential coalition members. It is not a bill draft; it is a design note explaining what the final structure is meant to accomplish.

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>

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>

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>

NCIA: Navigating the Future of Cannabinoid Regulation — Industry policy paper arguing for regulation by intended use and cannabinoid profile. <https://thecannabisindustry.org/wp-content/uploads/2024/05/Navigating-the-Future-of-Cannabinoid-Regulation-Balancing-Safety-Innovation-and-Consumer-Access.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>

NIHC Fit for Purpose hemp framework — Industrial-hemp policy framework organized around use and purpose. <https://nihcoa.com/fit-for-purpose/>