FROM HEMP TO SUPPLEMENTS – A FIELD GUIDE

INTRODUCTION

I've spent the last twenty-five years working in pharmaceuticals and dietary supplements — building products, systems, and companies designed to last beyond their first moment of success.

Today, I'm the founder and CEO of **Imbucanna**, a GMP-certified contract manufacturing organization specializing in solid oral dosage forms. We work with CBD brands, Farm Bill–compliant companies, and supplement brands that are evolving into serious, long-term health platforms.

I'm also the founder of **Inactive Ingredients**, a pharmaceutical formulation and excipient

distribution company serving the Rx manufacturing space.

Across those roles, I've seen the same pattern repeat itself.

Hype does not build durable brands.
Flashy labels do not fix weak operations.
Shelf space is not won by noise — it is earned by trust.

At Imbucanna, we do not simply manufacture products. We work alongside founders to develop scalable supplements — solid-dose formulations built to survive audits, meet buyer expectations, and remain commercially viable long after the first wave of enthusiasm fades.

Precision matters.
Stability matters.
Execution matters.

The difference between a successful launch and a brand that is still standing five years later is rarely marketing creativity alone. It is operational discipline, regulatory literacy, and the willingness to build within systems that reward consistency over shortcuts.

This field manual was written for founders who recognize that difference — and want to build optionality without panic.

Leo Mendez
Founder & CEO, Imbucanna

Chapter 1

Regulatory Uncertainty Isn't New, but the Stakes Are Changing

Regulatory uncertainty is not a new condition in hemp. If you've been operating for more than a few years, you have already lived through shifting definitions, enforcement ambiguity, state-by-

state contradictions, and the slow realization that clarity rarely arrives all at once.

What *is* changing is not the existence of uncertainty, but its **direction**.

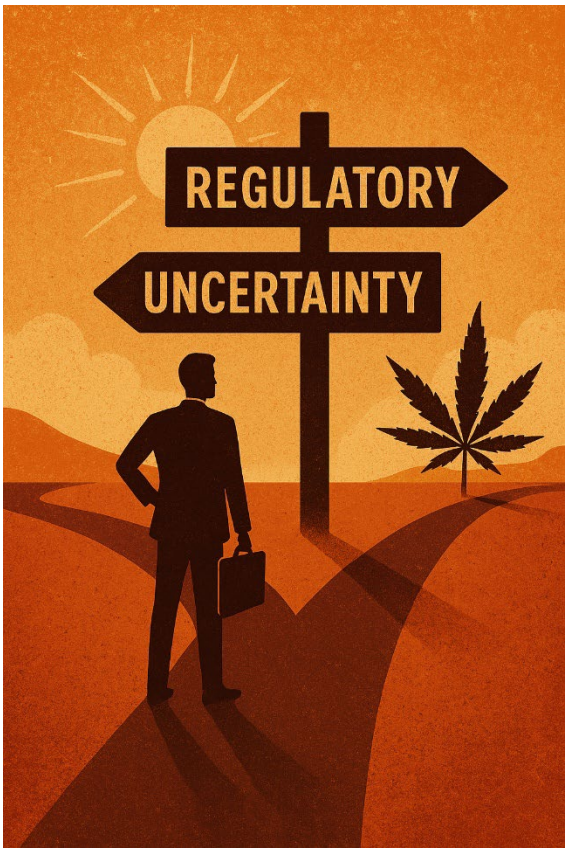
For most of hemp's modern history, the gray areas expanded faster than they contracted. Rules were loose, enforcement uneven, and many operators built viable businesses by moving quickly through gaps that had not yet hardened into walls. That era rewarded speed, creativity, and risk tolerance.

Today's environment is different.

Discussions around Schedule III, tightening federal interpretations, and increased scrutiny of ingestible cannabinoids are not signals of imminent collapse. They are signals of **consolidation**. Gray areas tend to shrink before they disappear. Standards tend to rise before they stabilize. When that happens, the cost of operating casually increases — quietly at first, then suddenly.

Schedule III, in particular, is widely misunderstood. It is not legalization. It does not simplify operations. It does not reduce compliance burden. If anything, it raises expectations around controls, documentation, and consistency, while narrowing the set of operators who can meet them comfortably.

This matters even for companies that never intend to touch Schedule III substances.



Regulatory shifts rarely isolate themselves neatly. They change how agencies think, how banks behave, how insurers underwrite risk, how retailers evaluate partners, and how acquirers perform diligence. The ripple effects extend beyond the specific rule being debated.

For founder-led hemp brands, the practical impact is subtle but real:

- Capital becomes more selective.
- Partners become more cautious.

- Margins absorb hidden compliance costs.
- Optionality quietly disappears for those who don't plan ahead.

Importantly, this is not a call to abandon cannabinoids. Nor is it a prediction that hemp products will vanish or become illegal overnight. That framing is both inaccurate and unhelpful.

The real question is simpler and more operational:

If parts of your cannabinoid portfolio became slower, riskier, or more expensive to operate, would your business still have momentum?

Founders who ask that question early tend to make calm, rational decisions. Founders who wait until rules harden often find themselves making rushed ones.

This guide exists for the former.

The goal is not to react to headlines, speculate on outcomes, or chase the next workaround. The goal is to build structural resilience — the ability to continue operating, growing, and attracting partners regardless of how one specific category evolves. That begins with understanding which parts of your existing business already translate cleanly into more stable regulatory frameworks, and which do not.

Dietary supplements, governed under DSHEA, represent one of the few adjacent categories where that translation can be done deliberately, legally, and without abandoning the operational strengths hemp brands have already developed.

The chapters that follow are not about predicting the future. They are about preparing for multiple versions of it — quietly, competently, and without panic.

Chapter 2

Why DSHEA Is the Cleanest Second Leg

For hemp brands thinking about optionality, the question is not *whether* to diversify, but **where** to do it without introducing new forms of risk.

Many adjacent paths look attractive at first glance: cosmetics, topicals, medical foods, international exports, or loosely defined "wellness" categories. In practice, most of these either remain small, introduce new regulatory ambiguity, or demand capabilities that do not map cleanly to how hemp operators already work.

Dietary supplements, governed under DSHEA, are different.

Not because they are easy — they are not — but because they are **legible**.

DSHEA has been tested for three decades. Its expectations are well understood. Its enforcement posture is imperfect but predictable. Most importantly, it rewards the same disciplines that serious hemp operators have already had to learn the hard way: documentation, content control, stability, supplier qualification, and GMP execution.

Supplements are not a downgrade from cannabinoids. They are a **parallel system** with clearer edges.

Where hemp has often operated in interpretive space, DSHEA operates in defined lanes. Where cannabinoids have relied on tolerance and

enforcement discretion, supplements rely on repeatable compliance. That distinction matters when conditions tighten.

From an operator's perspective, DSHEA offers three structural advantages.

First, **regulatory separation**.
A compliant supplement line can exist independently of cannabinoid policy shifts. Banking, insurance, payment processing, and retail conversations tend to be simpler. That separation creates breathing room when other parts of the business face scrutiny.

Second, **transferable capabilities**.
Low-dose formulation, uniformity at milligram levels, excipient systems, stability testing, and GMP discipline are not beginner skills. Hemp brands that have mastered ingestible cannabinoids already possess competencies that many supplement startups lack. DSHEA allows those strengths to compound rather than reset.

Third, **optionality without identity loss**.
A supplement line does not require abandoning cannabinoids or rebranding the company's origin story. It allows founders to tell a more credible, more durable narrative to partners: *this business is built to operate under multiple regulatory regimes.*

That narrative matters more than most founders realize.

It affects how distributors assess risk.
It affects how acquirers value resilience.
It affects whether a brand is seen as opportunistic or durable.

Importantly, supplements are not a loophole. DSHEA compliance is real compliance. Claims matter. Ingredient choices matter. Manufacturing standards matter. The brands that struggle are often those that treat supplements as an easier version of hemp rather than a different system with its own rules.

When approached deliberately, however, DSHEA offers something rare in the current environment: **a stable framework that does not require speculation**.

You do not need to guess how agencies will interpret cannabinoids next year to operate a compliant supplement line. You need to execute well inside known boundaries.

That is why DSHEA works as a second leg. Not because it promises growth, but because it preserves **control**.

In the next chapter, we will get specific about what actually translates from hemp into supplements — and, just as importantly, what does not.

Chapter 3

What Actually Translates from Hemp to Supplements

One of the most common mistakes hemp brands make when exploring supplements is assuming the transition is either trivial or impossible. In reality, it is neither.

Some capabilities translate cleanly. Others do not. Knowing the difference early saves time, capital, and credibility.

The strongest points of translation tend to be **operational**, not botanical.

Hemp operators who have succeeded with ingestible products have already learned to work within tight tolerances. They understand dose accuracy, batch consistency, supplier documentation, and the consequences of drift. These disciplines map directly to DSHEA-compliant supplement manufacturing, particularly in oral solid dosage forms.

Capsules, tablets, powders, and functional blends are natural extensions for brands that already formulate low-dose cannabinoids. The underlying challenge — delivering consistent milligram-level actives in a repeatable system — is fundamentally the same.

What often changes is not the process, but the **rules around inputs and outputs**.

Under DSHEA, ingredient status matters more than novelty. Claims must be substantiated differently. Labels are scrutinized for structure–function language rather than implied pharmacology. Brands accustomed to navigating hemp's gray areas often underestimate how literal supplement compliance can be.

This is where experience helps.

Hemp brands that already operate with conservative claims, clean formulations, and disciplined documentation tend to adapt quickly. Brands built on aggressive language, fast iteration, and creative interpretation struggle more.

Certain product categories translate especially well.

Sleep, stress, focus, recovery, metabolic health, and daily wellness are familiar territories for hemp brands. In many cases, cannabinoids were one component of a broader functional promise rather than the entire mechanism. Removing or repositioning that component does not invalidate the category — it simply requires reformulation.

Other areas translate poorly.

Products whose value proposition relies almost entirely on cannabinoids, novelty, or loopholes rarely survive the shift intact. Likewise, brands whose differentiation depends on exaggerated claims or ambiguous dosing often find that DSHEA removes the very levers they relied on.

This does not mean those brands are doomed. It means the transition requires more structural change than a simple ingredient swap.

Another area of clean translation is **manufacturing posture**.

Hemp brands that already work with GMP facilities, maintain batch records, retain samples, and think in terms of systems rather than one-off SKUs are ahead of the curve. DSHEA does not demand perfection, but it does demand repeatability.

Brands that have treated manufacturing as a backend afterthought often find the supplement transition uncomfortable, not because it is harder, but because it is less forgiving.

The most successful transitions tend to share three traits:

- They leverage existing operational strengths rather than chasing new categories.
- They choose supplement products that reinforce the brand's existing functional narrative.

- They respect DSHEA as a framework, not a workaround.

In short, hemp brands are not starting from zero. But they are not automatically prepared either.

Understanding what translates — and what does not — allows founders to move deliberately instead of experimenting publicly.

The next chapter examines where those experiments most often go wrong, and why otherwise capable teams quietly stall during the transition.

Chapter 4

Marketing Without Cannabinoids: How to Carry Your Audience With You

The most fragile part of any hemp-to-supplement transition is not formulation. It is communication.

Founders often assume their audience is loyal to cannabinoids themselves. In reality, most customers are loyal to **outcomes**: better sleep, calmer days, sharper focus, faster recovery. Cannabinoids were the mechanism, not the promise.

This distinction matters.

When brands remove or supplement cannabinoids without reframing the story, customers experience confusion rather than continuity. When brands introduce non-cannabinoid products as extensions of the same functional narrative, adoption tends to be quiet and surprisingly strong.

The goal is not to replace cannabinoids in the customer's mind. It is to **widen the system of support** around the same needs.

Start With Familiar Outcomes, Not New Categories

The cleanest marketing transitions do not announce themselves as pivots. They introduce new products as *adjacent tools* serving the same purpose customers already recognize.

For example:

- A sleep brand does not "launch supplements."
  It introduces *a nightly formula for deeper, more consistent rest — no cannabinoids required.*
- A stress brand does not "diversify away from hemp."
  It offers *daytime calm support designed for clarity, not sedation.*
- A recovery brand does not "enter DSHEA."
  It adds *daily tissue support and inflammation balance for training days.*

The language stays familiar. The mechanism evolves.

Use Parallel Language, Not Substitution Language

One of the most common mistakes is framing non-cannabinoid products as replacements.

Customers hear "replacement" as loss.

Instead, successful brands use **parallel positioning**:

- "Another option for nights when you don't want cannabinoids."

- "A daily foundation, with cannabinoids layered on when needed."
- "Built for travel, workdays, or situations where cannabinoids aren't ideal."

This preserves choice. Choice preserves trust.

Give Customers a Reason Beyond Regulation

Do not lead with legality, shipping restrictions, or policy shifts. Customers do not experience regulation as value.

They experience:

- Broader accessibility
- Consistent availability
- Predictable effects
- Daytime usability
- Workplace compatibility

Those are the benefits to emphasize.

National availability is not a compliance story. It is a **convenience story**.

Examples of Non-Cannabinoid Parallels (Without Overclaiming)

You do not need to educate customers on biochemistry. You need to anchor expectations.

Examples of language patterns that work:

- "Supports relaxation without impairment"
- "Promotes mental calm while preserving alertness"
- "Designed for consistent nightly routines"
- "Built for daily use, not just occasional relief"

Avoid comparative claims. Avoid implication that cannabinoids were a problem. The goal is continuity, not correction.

Marketing Nationally Changes the Conversation

One underappreciated advantage of DSHEA products is not compliance — it is **scale**.

National distribution simplifies:

- Paid media
- Influencer partnerships
- Retail conversations
- Affiliate programs
- Corporate and institutional accounts

Brands accustomed to state-by-state limitations often underestimate how much creative energy is freed when geography disappears from the strategy.

Marketing becomes about audience alignment rather than legal navigation.

That shift alone often improves message quality.

Introduce Quietly, Then Normalize

The most effective rollouts are not launches. They are introductions.

Founders who succeed tend to:

- Soft-introduce to email or SMS audiences
- Position products as additions, not announcements
- Let early adoption normalize the offering
- Avoid "we're changing" narratives

Within weeks, the product simply becomes part of the catalog.

At that point, the market does the work.

The Operator's Rule

If a customer can understand *why* a product exists in one sentence, you are ready to market it.

If it requires explanation, justification, or regulatory context, it is not ready.

The next chapter returns to execution — specifically, where marketing optimism often runs ahead of operational reality, and how those gaps quietly derail otherwise smart pivots.

Chapter 5

The Five Most Common Pivot Mistakes

Most hemp-to-supplement pivots do not fail loudly. They stall, drift, or quietly exhaust attention and capital until the effort is abandoned. The underlying causes are rarely technical. They are structural.

The first mistake is **treating supplements as a side project**.

Founders often assign the transition to a junior team member or external consultant, assuming it will "run itself" once launched. In reality, supplements require the same executive attention as any other regulated product line. Without clear ownership, decisions linger, timelines stretch, and compliance gaps emerge unnoticed.

The second mistake is **overcorrecting on speed**.

After years of operating in gray areas, some teams rush to prove legitimacy by launching quickly, overbuilding SKUs, or locking in formulations before they are ready. This often leads to products that are technically compliant but commercially misaligned — expensive to make, hard to explain, or disconnected from the brand's core identity.

The third mistake is **misunderstanding claims discipline**.

DSHEA does not restrict marketing creativity, but it does demand precision. Brands accustomed to suggestive or experiential cannabinoid language sometimes struggle to adapt. The result is either overly timid messaging that fails to convert, or risky language that undermines the very stability the supplement line was meant to provide.

The fourth mistake is **choosing ingredients for novelty rather than durability**.

Supplements reward boring excellence. Ingredients with long regulatory histories, stable supply chains, and clear documentation outperform fashionable compounds when conditions tighten. Brands that chase differentiation through obscure actives often recreate the same fragility they were trying to escape.

The fifth mistake is **ignoring manufacturing reality**.

Formulas that look elegant on paper can be expensive, unstable, or impractical at scale. Hemp brands that have already wrestled with content uniformity and low-dose challenges sometimes forget those lessons when cannabinoids are removed from the equation. The result is products that pass initial review but struggle in real production.

Underlying all five mistakes is a single pattern: **reactive decision-making**.

Pivots driven by fear tend to optimize for immediacy. Pivots driven by optionality optimize for resilience. The difference is rarely visible at launch, but it becomes obvious over time.

The final chapter focuses on what a sensible transition actually looks like — not in theory, but in structure, pacing, and expectation

Chapter 6

What a Sensible Transition Actually Looks Like

A sensible transition from hemp to supplements does not announce itself as a pivot. It unfolds quietly, in phases, with minimal disruption to the existing business.

The first phase is **assessment**, not formulation.

Before a single ingredient is selected, capable teams take inventory of what they already have: product categories, functional claims, manufacturing partners, internal competencies, and brand positioning. The goal is not to design something new, but to identify where the business already overlaps with DSHEA-compatible territory.

This phase is short, but decisive. When done properly, it narrows the field to a small number of viable supplement directions rather than an open-ended brainstorm.

The second phase is **selective execution**.

Most successful transitions begin with one to three products, not a full line. These products are chosen because they reinforce the brand's existing narrative and can be manufactured repeatably without heroics. Early success is measured in operational stability, not revenue velocity.

This is also where timelines are often misunderstood.

A realistic supplement launch, executed properly, takes longer than a rushed hemp SKU but shorter than most founders expect. The work is front-loaded: ingredient vetting, formulation refinement, label discipline, and manufacturing alignment. Once those pieces are in place, scaling becomes boring — which is exactly the point.

The third phase is **structural separation**.

While the brand story may remain unified, the systems should not. Banking, inventory tracking, documentation, and manufacturing oversight benefit from being clearly delineated between cannabinoid and non-cannabinoid products. This separation is not about optics. It is about resilience.

When one side of the business encounters friction, the other continues operating without contagion.

The final phase is **optional integration**.

Once a supplement line is stable, founders can decide how tightly to integrate it into the broader business. Some brands keep it as a quiet backbone. Others allow it to grow into a primary revenue driver. The key is that the choice remains theirs.

At no point does a sensible transition rely on predictions about enforcement, elections, or policy shifts. It relies on execution inside known boundaries.

This approach does not eliminate risk. It reallocates it.

Conclusion

Using Optionality, Not Panic

Regulatory change is inevitable. Panic is optional.

The hemp brands that endure are rarely the loudest or the fastest. They are the ones that build systems capable of absorbing change without rewriting the business every time the rules evolve.

Dietary supplements under DSHEA are not a solution to uncertainty. They are a way to operate despite it.

The purpose of this briefing was not to persuade you to act immediately, nor to suggest that cannabinoids no longer belong in your portfolio. It was to offer a framework for thinking clearly while others react noisily.

If you are already operating with discipline, much of what you need may already be in place. If not, the work is still manageable — provided it is done deliberately.

For founders who want an external, operator-level perspective, we offer a short Pivot Readiness Review. It is not a sales call. It is a structured conversation designed to clarify which parts of your business translate cleanly, which do not, and what a realistic path forward could look like.

imbucanna™