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Laboratory Sample and Test Result Reporting in Metrc

Division of Cannabis Regulation

State Fairgrounds • P.O. Box 19281 • Springfield, IL 62794-9281 • 217/524-2143 • TDD 866/287-2999 • Fax 217/524-4215

Compliance Issue

The purpose of this notice is to clarify the responsibilities of licensed Illinois cannabis testing facilities with regard to the timely and complete reporting of laboratory test results in the Seed-to-Sale traceability system, Metrc.

Section 1300.700(m) Laboratory Testing

The Laboratory shall file with the Department an electronic copy, at the same time that it transmits those results to the Cultivation Center, Craft Grower, or Infuser, of each laboratory test result for any batch that does not pass the Microbiological, Mycotoxin, Heavy Metals, or Pesticide Chemical Residue test. In addition, the Laboratory shall maintain the laboratory test results for at least 5 years and make them available at the Department's request.

To satisfy the requirements of Section 1300.700, cannabis Testing Laboratories should upload all failed test results to Metrc.

Timely reporting of test results allows the Department and regulated licensees to accurately determine the testing status of cannabis packages, prevents incomplete or misleading testing records, and supports the integrity of Illinois' Seed-to-Sale traceability program.

Metrc is the State of Illinois system of record for tracking cannabis throughout the regulated supply chain, including laboratory testing. Testing Laboratories are responsible for ensuring that laboratory test results are reflected in Metrc in an accurate and timely manner. Delayed, incomplete, or omitted laboratory reporting may result in inaccurate testing statuses, prevent downstream licensees from accurately determining the compliance status of cannabis or cannabis products, and impair the Department's ability to effectively monitor the supply chain.

Guidance

1. Timely Receipt and Reporting of Laboratory Samples

Following receipt and completion of testing, Laboratories shall report the applicable laboratory results in Metrc within a reasonable timeframe. Completed laboratory results shall not be withheld from or left unreported in Metrc after the laboratory has finalized and communicated those results to the submitting licensee.

2. Complete Reporting of Laboratory Test Results

Laboratory results entered into Metrc must constitute the complete set of results associated with the Laboratory Test Batch requested for the sample.

When a full-panel Laboratory Test Batch has been selected, the Laboratory shall report all results required for that Laboratory Test Batch. Uploading only selected analytes, individual test results, or a partial set of results does not satisfy the reporting requirement for a full-panel test.

A Laboratory shall not substitute partial Research and Development (R&D) test results for a compliance or full-panel Laboratory Test Batch. If a full-panel Laboratory Test Batch was requested in Metrc, all applicable results for that Laboratory Test Batch must be completed and reported accurately.

Failed R&D test results must be reported in Metrc. The selection of an R&D Laboratory Test Batch does not exempt a Laboratory from reporting the results of testing performed. Laboratories shall report all applicable results associated with the R&D Laboratory Test Batch selected in Metrc. R&D testing does not replace testing required under 8 Ill. Adm. Code 1300.700.

3. Failed Laboratory Test Results

Laboratories are reminded that Section 1300.700(m) requires specified failed laboratory test results to be electronically filed with the Department at the same time the results are transmitted to the submitting Licensee.

For purposes of satisfying this electronic filing requirement, the Department will consider the timely and complete reporting of the applicable test result in Metrc to constitute electronic filing of the result with the Department.

Laboratories must ensure that the failed result is reported in Metrc no later than the time the Laboratory transmits the result to the Cultivation Center, Craft Grower, or Infuser.

Questions

For questions regarding Laboratory Testing requirements, please contact the Illinois Department of Agriculture, Division of Cannabis Regulation at AGR.CannabisLab@illinois.gov.

For technical questions regarding Metrc system functionality, please contact Metrc Support.