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9 - 10 December 2020

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Meet the Speakers

Jeanne Duckett
Transparency Initiative Development
Avery Dennison

Julie McGill
VP of Supply Chain and Insights
FoodLogiQ

FSMA 204: Enhanced Traceability Recordkeeping Requirements

Enhanced Traceability
FSMA 204 lays the foundation for end-to-end food traceability, extending beyond the current “one-up and one-back” requirement.

Designated High-Risk Foods
Listing of a wide variety of produce, dairy, seafood, and ready-to-eat products that would require traceability records.

Harmonized Approach
Reviewed existing standards, industry initiatives and current approaches.

FSMA 204 Proposal - Key Areas

- Traceability Program Records
- Roles and Responsibilities
- Exemptions
- Data Attributes
- Compliance Dates
- Economic Analysis

Image: FDA New Era of Smarter Food Safety

Who is Affected?

Proposal is a requirement for those who:

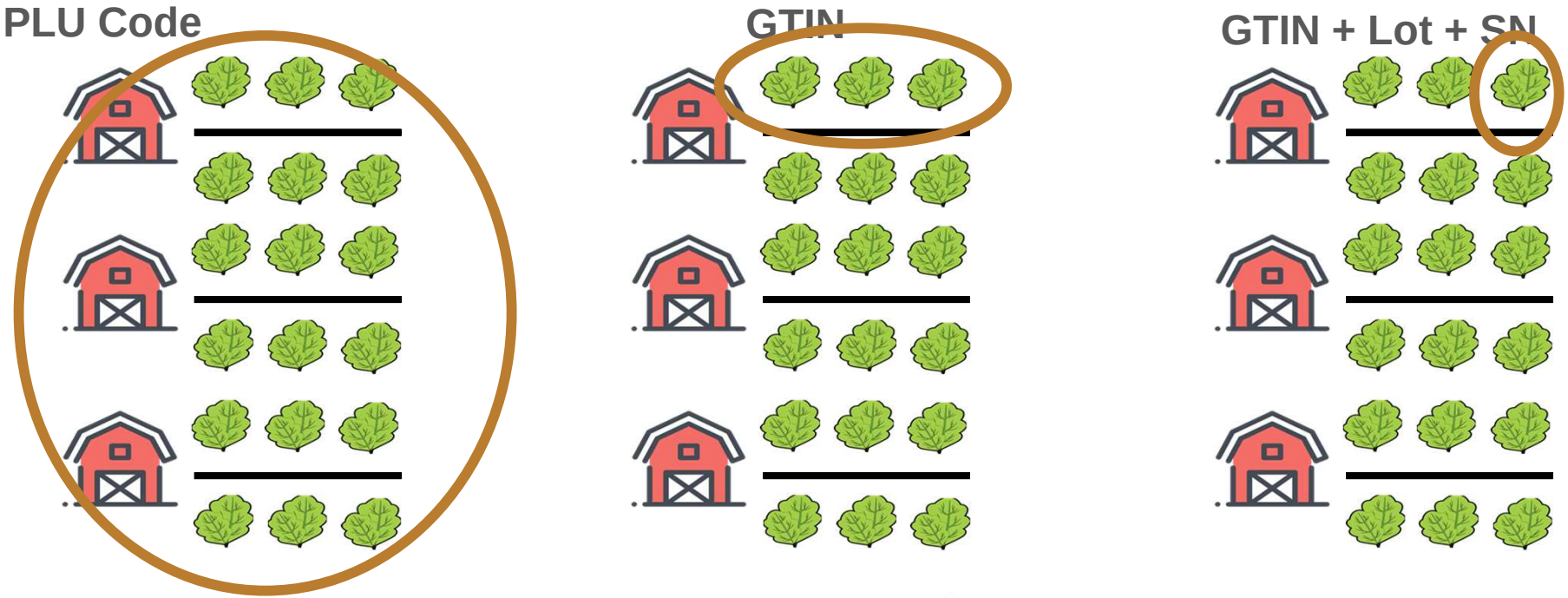
- Manufacture
- Process
- Pack or
- Hold foods on the Food Traceability List (FTL)

The additional recordkeeping requirements would apply not only to foods specifically listed on the FTL, but also to foods that contain foods on the list as ingredients.

Includes domestic and foreign entities

What are the Proposed Requirements?

Power of Traceability



Making Sense of the Data

It’s all about Events and Attributes

Critical Tracking Events (CTE)

An event in the supply chain of a food involving the growing, receiving (including receipt by a first receiver), transforming, creating, or shipping of the food.

Key Data Elements (KDE)

The data attributes or information associated with a Critical Tracking Event for which a record would have to be established and maintained.

Single Ingredient CTE

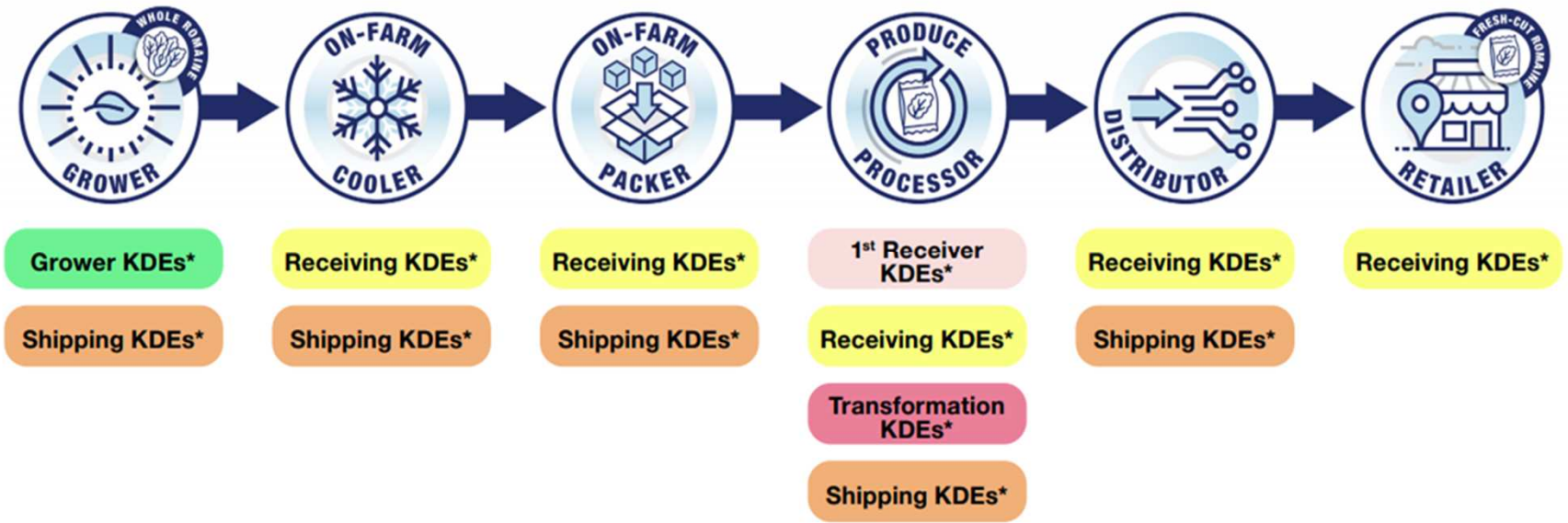


Image: FDA FSMA Proposed Rule for Food Traceability

Multiple Ingredient CTE

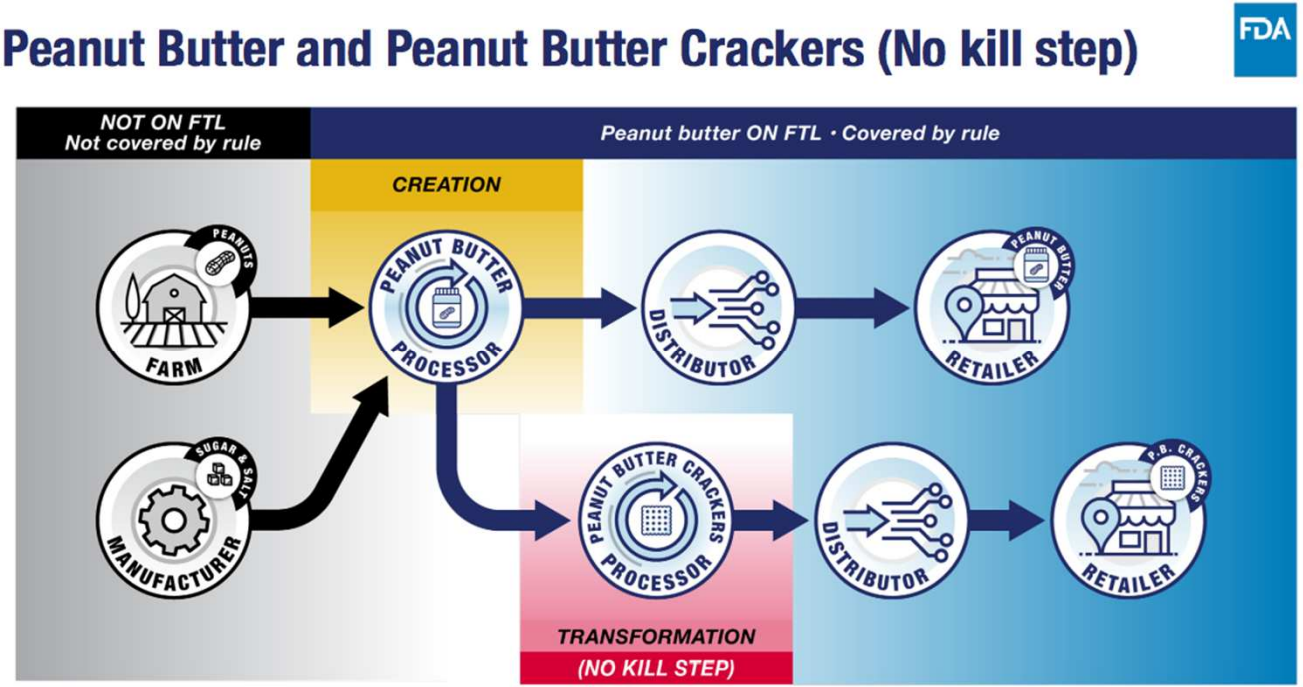


Image: FDA Creation and Transformation

Proposal Aims to Help the Food Industry

Standardize

Data elements and information that companies must establish and maintain across the supply chain.

Define

Define the information to be shared with the next entity in the supply chain.

Facilitate

Rapid and accurate traceability capture required traceability data.

Act

Leverage traceability data needed to prevent or mitigate foodborne illness outbreaks.

Key Dates

Timeline:

Sept 2020	Published to Federal Register
Jan 21, 2021	Public Comments Due
November 2022	Finalized Rule
January 2025	Compliance Date For All Parties

FDA Public Meetings on Food Traceability Rule:

Online meetings held 11/6, 11/18 and 12/2 2020

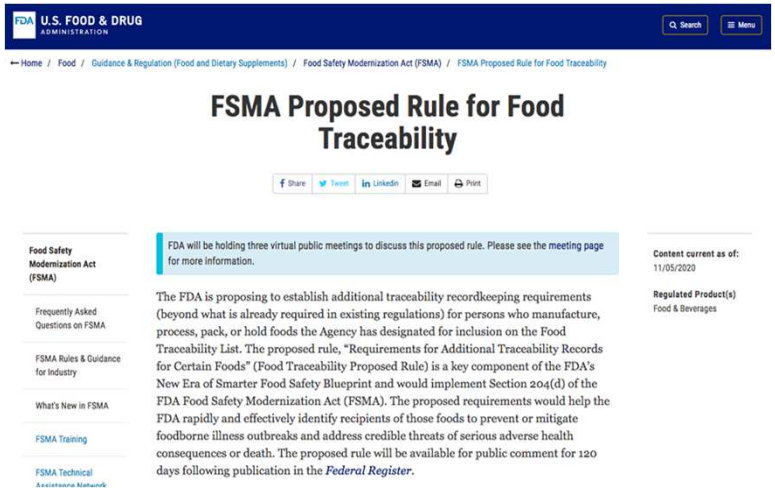
Recordings and transcripts from all 3 meetings available on the FDA website

Get Involved!

The FDA continues to update their website with extensive documentation

Subscribe to their updates to ensure you are aware of the latest tools and documentation

Participate in industry workgroups



GS1 US EPC Extended Attributes Group

Charter Statement: "Working within the GS1 system of standards, simplify the capture of traceability attributes encoded in the EPC/RFID data carrier in the Foodservice and Retail Grocery industries."

Scope: "This workgroup will fully define the problem and business requirements, weigh possible solutions, and create an industry-specific guideline that defines near-term guidance in a manner that will not hinder the community or industry."

Contact: Jonathan Gregory, Director, Community Engagement

jgregory@gs1us.org

Or request to join the group from the GS1 US Community Room

https://community.gs1us.org/kws

Contact Us

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Questions

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Presentations will be available on-line soon. You will receive an email with a link when they are available.