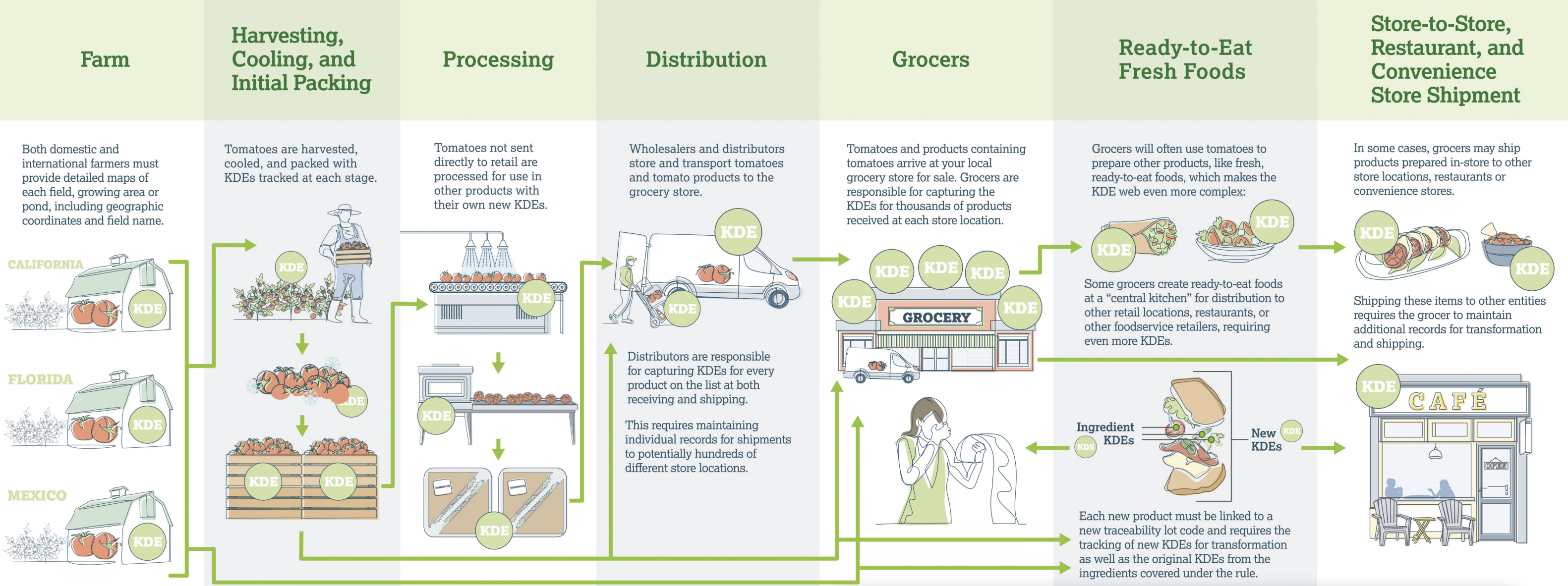


FDA'S FOOD TRACEABILITY RULE DOCUMENTING A TOMATO FROM FARM TO GROCER



The U.S. Food and Drug Administration (FDA) issued a highly complex Food Traceability Rule 11 years after passage of the Food Safety Modernization Act. This law was originally designed by Congress to quickly identify and mitigate risk associated with a small number of "high risk" foods more prone to contamination, such as sprouts. However, when the rule was published, the scope expanded dramatically to include a lengthy list of foods impacting well above 10,000 products. The sheer complexity of FDA's mandates puts an unnecessary paperwork burden on an already stressed food supply chain without any focus on prevention – which should be the core of FDA's mission.

Look at all the steps involved in tracking the journey of a tomato from farm to grocery store:



KDE

A total of 117 Key Data Elements (KDEs) must be tracked for nine Critical Tracking Events (CTEs) in the supply chain.

3 billion

Number of records FDA estimates the food industry will need to keep each year

10 million

Number of hours FDA estimates it will take to maintain the 3 billion data points

\$24.6 billion

FDA's estimated cost to the food industry

2.8 billion

Share of the 3 billion records – or 94% – grocers and food retailers are responsible for maintaining

24 hours

Timeframe to produce all records in a sortable electronic spreadsheet upon FDA request

2 years

Length of time records must be kept for fresh foods that will have long been consumed or expired

Business models are rapidly changing, and any regulatory framework should provide flexibility to adapt with business practices. FDA's Food Traceability Rule inhibits progress by:

- Creating an unnecessary paperwork burden that diverts resources from the primary focus of preventing foodborne illness.
- Requiring a level of detail and tracking not achievable or valuable with current technology.
- Imposing unreasonable obligations on small and medium size businesses and farms who are least able to absorb additional costs.
- Creating administrative costs that will significantly increase already elevated food prices for shoppers without a demonstrated public health benefit.

