

**WORKFORGE**



**Is your operation prepared  
and able to meet the FDA's  
food traceability  
requirements?**

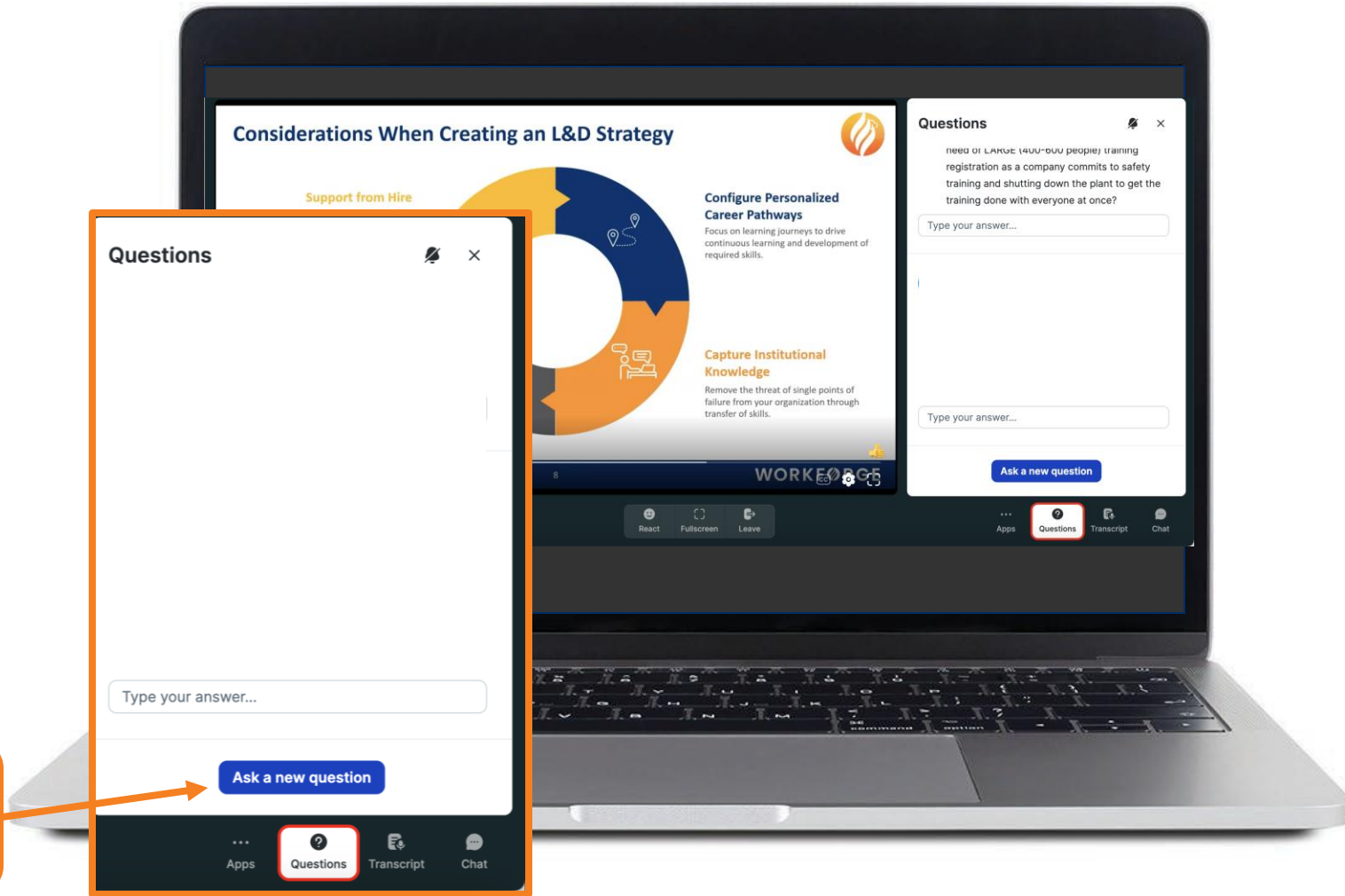


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# Housekeeping

- Everyone is muted by default
- Use Q&A tab to post questions
- Recording and slides will be shared immediately following event

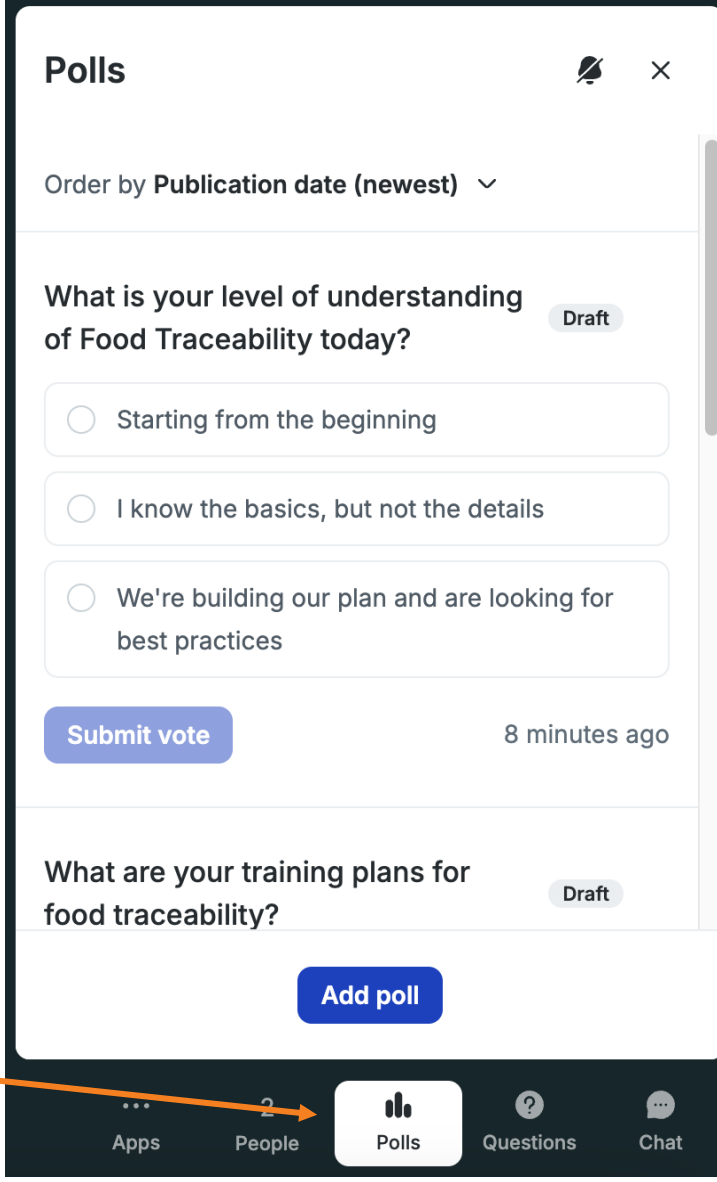
We will do our best to answer as many questions as possible during the presentation using the Q&A tab.



# Poll Questions

1. What is your level of understanding of Food Traceability today?

Click the Polls icon on the right to answer the questions.



# Today's presenter



**Erik Kurdelak**

**Food Safety and Industry Expert**

- Over 25 years in food safety
- State of Indiana subject matter expert for Food Protection Division
- Has done extensive work with Purdue University Food Science
- Founding Board Member of The Central Indiana Food Hub & Sustainability Center

# Agenda

1

Critical Definitions

2

General Overview

3

Outline specific actions to take for compliance

4

Discuss various approaches to the required actions

5

What the FDA's approach to FTR suggests for the future

6

Actions you can take to prepare

# Food Traceability List



List of foods for which additional traceability **records are required** to be maintained, as designated in accordance with section 204(d)(2) of the FDA Food Safety Modernization Act. The term “Food Traceability List” includes both the **foods specifically listed** and **foods that contain listed foods** as ingredients.

What you need to know:

- Includes many soft cheeses, most produce, finfish, nut butters, shell eggs, mollusks, crustaceans, RTE deli salads
- Rule also applies to manufactured foods containing FTL foods as an ingredient
  - Quiche
  - Pie
  - Etc.

# Critical Tracking Event (CTE)



**An event in the supply chain** of a food involving the harvesting, cooling (before initial packing), initial packing of a raw agricultural commodity other than a food obtained from a fishing vessel, first land-based receiving of a food obtained from a fishing vessel, **shipping, receiving, or transformation of the food.**

What you need to know:

- Tracking is required as product flows through the facility
- Primary CTEs are:
  - Receiving
  - Holding
  - Transforming
  - Packing
  - Shipping
- CTEs are the point in the flow of food where Key Data Elements (KDE) are recorded

# Key Data Element (KDE)



**Information associated with a critical tracking event** for which a **record must be maintained and/or provided** in accordance with this subpart.

What you need to know:

- KDEs are the specific data required to be captured at each CTE
- Not all CTEs require the same KDEs
- Different people will collect different KDEs as the product moves through the facility



# CTE & KDE: Example



CTE & KDEs are sometimes regarded in three stages



- Transforming may have 14 KDE
- Packaging may have 9 KDE
- Expect duplicate data capture across the various processes



**A batch or lot of food** that has been initially packed (for raw agricultural commodities other than food obtained from a fishing vessel), received by the first land-based receiver (for food obtained from a fishing vessel), or **transformed**.

What you need to know:

- Traceability Lot describes on set or batch of a given ingredient or product
- Lot size is determined by the operation, not the government
- Large lots vs. Small lots

# Determining your lot size strategy



## Large Lots

- Less data capture
- Larger recalls
- More complicated recalls

## Small Lots

- More data capture
- Smaller recalls
- Less complex recalls



# Traceability Lot Code



**A descriptor**, often alphanumeric, **used to uniquely identify a traceability lot** within the records of the traceability lot code source.

What you need to know:

- This is the specific code assigned by an operation to describe a Lot.
- When product moves on to the next location or the next user it is expected that they be provided an explanation of the lot code.

# Traceability Lot Code Source



The organization that assigned a traceability lot code to the food product.

What you need to know:

- The lot code source tells who came up with the Lot Code for a product or ingredient
- The Lot Code Source decided what string of numbers and letters to use as the Lot Code
- It tells WHO assigned the traceability lot code

# Traceability Lot Code Source Reference



An **alternative method for providing** FDA with **access to the location description for the traceability lot code source** as required under this subpart.

What you need to know:

- Lot Code Source Reference provides a way to be sure that the Lot Code Source can be contacted
- Often this is a facility address. It tells WHERE the traceability lot code was assigned.
- Traceability Lot Code Source may also be a company's website in certain cases

# Every operation under FTR must



**Have a plan**



**Be prepared to  
share their plan  
with the FDA**

# Every plan requires



## 5 Key Elements

1. A description of the procedures you use to maintain the records you are required to keep under this subpart, including the format and location of these records.
2. A description of the procedures you use to identify foods on the Food Traceability List that you manufacture, process, pack, or hold;
3. A description of how you assign traceability lot codes to foods on the Food Traceability List in accordance with [§ 1.1320](#).
4. A statement identifying a point of contact for questions regarding your traceability plan and records.
5. If you grow or raise a food on the Food Traceability List (other than eggs), a farm map showing the areas in which you grow or raise such foods.



# Traceability plan expectations



1

You must update the traceability plan as needed to keep information & practices current.

2

You must retain any previous versions of your traceability plan for 2 years after making updates to the plan.

3

No Exceptions: You must assign a Traceability Lot Code whenever you transform a food.

4

Once a Lot Code is established by your operation your operation cannot change it during a later CTE!

# Required records for receiving



- ✓ The traceability lot code for the food
- ✓ The quantity and unit of measure of the food
- ✓ The product description for the food
- ✓ The location description for the immediate previous source of the food
- ✓ The location description for where the food was received
- ✓ The date you received the food
- ✓ The location description for the traceability lot code source, or the traceability lot code source reference
- ✓ The reference document type and reference document number

1	RECEIVING		ENHANCED TRACEABILITY REQUIREMTN FOR FTR								
2											
3	Traceability Lot Code of Ingredient	Ingredient Quantity	Ingredient Unit of Measure	Date Received	Ingredient Description	Ingredient Lot Code Source Location Description	Ingredient Lot Code Source	Ingredient Supplier Location Description	Ingredient Supplier	Receiving Location Description	Reference Document Type
4	A259ZA	120	50# cs	5/17/2024	Peanut Butter	1 Peanut Butter Way, Kansas City, MO	Really Good Peanut Butter Company	1 Peanut Butter Way, Kansas City, MO 66214	Really Good Peanut Butter Company	1 Peanut Butter Cookie Company 1 Peanut Butter Cookie Way, Kansas City, MO 66214	Trailer Check Sheet
5	A259ZA	150	50# cs	5/18/2024	Peanut Butter	1 Peanut Butter Way, Kansas City, MO	Really Good Peanut Butter Company	1 Peanut Butter Way, Kansas City, MO 66214	Really Good Peanut Butter Company	1 Peanut Butter Cookie Company 1 Peanut Butter Cookie Way, Kansas City, MO 66214	Trailer Check Sheet
6	A259ZA	145	50# cs	5/19/2024	Peanut Butter	1 Peanut Butter Way, Kansas City, MO	Really Good Peanut Butter Company	1 Peanut Butter Way, Kansas City, MO 66214	Really Good Peanut Butter Company	1 Peanut Butter Cookie Company 1 Peanut Butter Cookie Way, Kansas City, MO 66214	Trailer Check Sheet

# Required records for transforming



For the food on the Food Traceability List used in transformation (if applicable), the following information:

- ✓ The traceability lot code for the food
- ✓ The product description for the food to which the traceability lot code applies
- ✓ For each traceability lot used, the quantity and unit of measure of the food used from that lot

Date of Transform	Ingredient Description	Ingredient Quantity Used	Ingredient Unit of Measure	Ingredient Traceability Lot Code	Ingredient Lot Code Source	Ingredient Lot Code Source Location Description
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# Required records for transforming



For the food produced through transformation, the following information:

- ✓ The new traceability lot code for the food
- ✓ The location description for where you transformed the food
- ✓ The date transformation was complete
- ✓ The product description for the food
- ✓ The quantity and unit of measure of the
- ✓ The reference document type and reference document number

Transforming Location Description	Product Description	Product Quantity Made	Product Unit of Measure	Product Lot Code Assigned by company	Reference Document Type	Reference Document Number
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# Required records for shipping



- ✓ The traceability lot code for the food
- ✓ The quantity and unit of measure of the food
- ✓ The product description for the food
- ✓ The location description for the immediate subsequent recipient of the food
- ✓ The location description for the location from which the food shipped
- ✓ The date you shipped the food
- ✓ The location description for the traceability lot code source, or the traceability lot code source reference
- ✓ The reference document type and reference document number

# General requirements

## Records

- You must keep original paper or electronic records
- All records must be legible
- Securely and safely stored to prevent damage or theft



# General requirements

## Record Availability

- All records required to be available to an authorized FDA representative, upon request, within 24 hours
- Offsite storage is permitted, as long as they can be retrieved in 24 hours
- 24 hours starts at phone request, not written
- Must provide in a sortable spreadsheet

1	RECEIVING	ENHANCED TRACEABILITY REQUIREMENT FOR FTR									
2											
3	Traceability Lot Code of Ingredient	Ingredient Quantity	Ingredient Unit of Measure	Date Received	Ingredient Description	Ingredient Lot Code Source Location Description	Ingredient Lot Code Source	Ingredient Supplier Location Description	Ingredient Supplier	Receiving Location Description	Reference Document Type
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# General requirements

## Record retention

You must maintain records for 2 years from the date you created or obtained the records.

## Use of existing records

- You do not need to duplicate existing records
- You may supplement any such existing records as necessary to include all of the information required by this subpart.



# Paper data capture



- Is paper and clipboards even possible?
- Paper must be transferred into a searchable spreadsheet
- Originals must be organized, secured and stored for 2 years

# Electronic data capture



- Multiple barcodes?
- Can you add new data to existing codes?
- Will you need one code for supplier data and another for your operations?
- Is the data secure?



# Personnel considerations



- Are tasks assigned to a specific team?
- How will you train the front lines to complete tasks?
- How will you train the front lines why FTR is done?
  - Auditors will ask

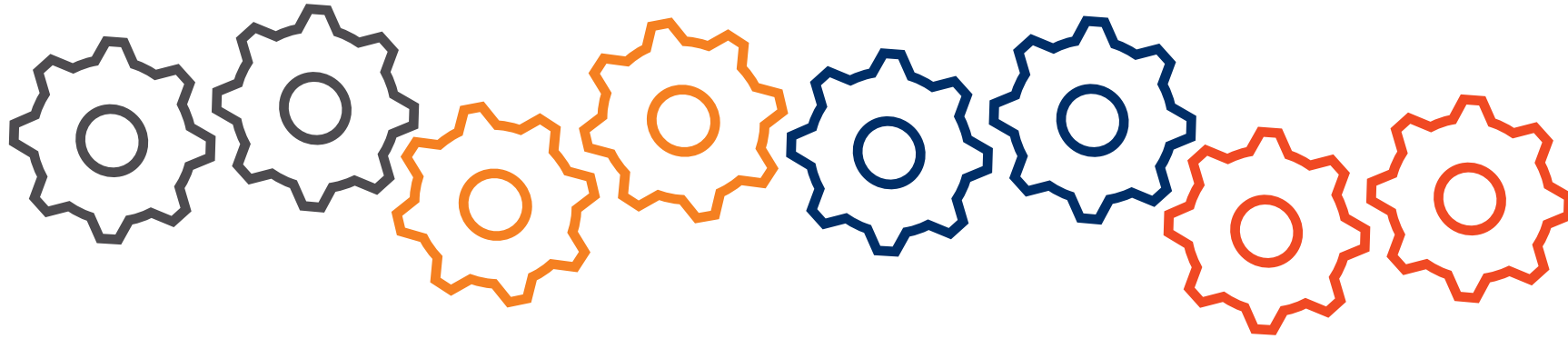


# External considerations and future plans



- What is the net impact mock recalls and audit readiness?
- How will you handle customer demands to use their tracking platform?
- How will you handle others passing their increased compliance on you?
- Should you apply traceability to all items?
- How long until more items are added to the Food Traceability List?





**Interdepartmental with  
electronic data capture**

A man with a beard, wearing a safety vest over a plaid shirt, is looking at a tablet in a workshop setting. The background is blurred, showing industrial equipment. The image has a blue tint.

What's FTR suggests  
for the future

# What to expect



1

## Digital Records

Will paper and excel tracking become too hard or even permitted?

2

## 24-Hour Turnarounds

Will all record request become a 24-hour turnaround?

3

## Other governing bodies

Will digital records and 24-hour turnarounds become the norm across all governing bodies?

A man with a beard, wearing a safety vest over a plaid shirt, is looking at a tablet in a workshop setting. The background is blurred, showing various tools and equipment. The entire image has a blue tint.

What should you do?



# FTR is coming...Are you ready?



You have 15 months to

Understand the requirements

Assess your options to execute

Build your plan

Effectively train your team

Implement



**Employee  
Retention**

**Food  
Traceability  
e-learning  
modules**

**Custom  
training  
modules for  
your unique  
SOPS**

## **How WorkForge Can Help**

**Operational  
efficiency**

**Digital training  
records**

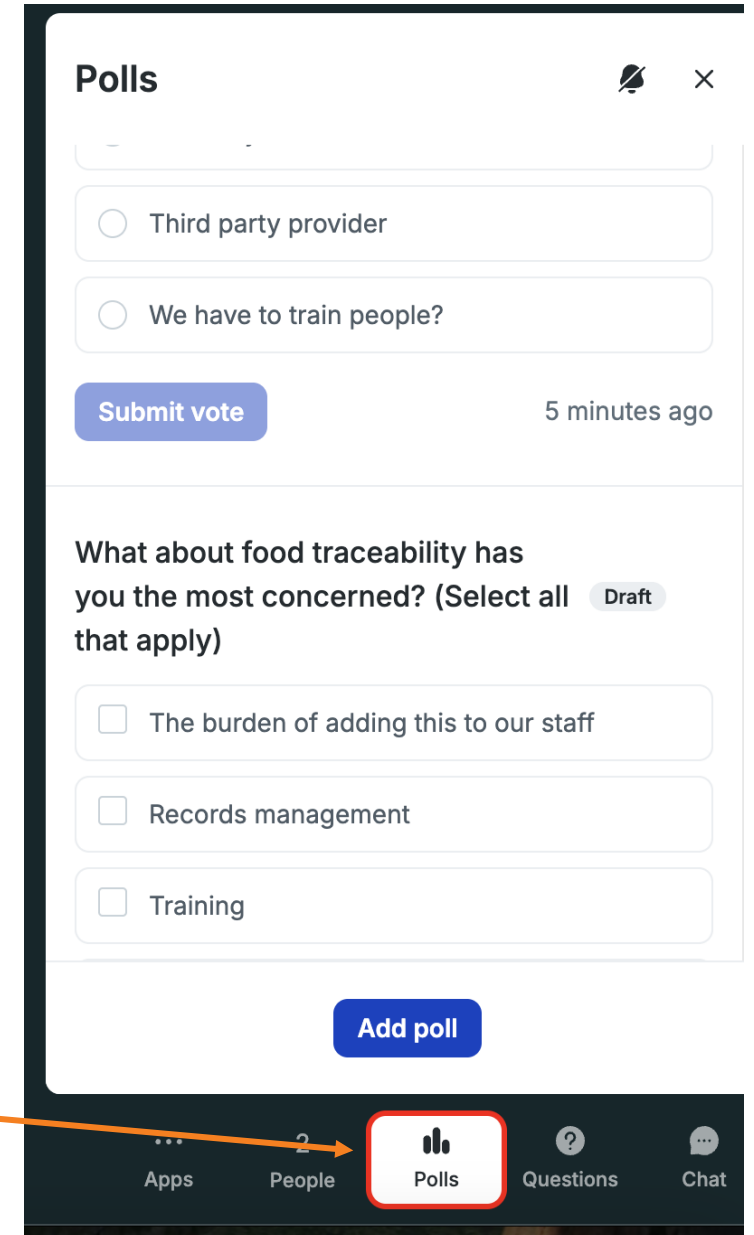
A man with a beard, wearing a light-colored safety vest over a plaid shirt, is looking down at a tablet computer in a workshop setting. The background is blurred, showing various tools and equipment. The entire image has a blue tint.

Questions?

# Poll Questions

1. What are your training plans for food traceability?
2. What about food traceability has you the most concerned? (Select all that apply)

Click the Polls icon on the right to answer the questions.



The screenshot shows the 'Polls' section of the WorkForge mobile app. At the top, there's a header 'Polls' with a close icon. Below it, there are two poll questions:

- Question 1: "What are your training plans for food traceability?" with two radio button options: "Third party provider" and "We have to train people?". A "Submit vote" button is visible, and the poll was created "5 minutes ago".
- Question 2: "What about food traceability has you the most concerned? (Select all that apply)". It has a "Draft" label and three checkbox options: "The burden of adding this to our staff", "Records management", and "Training".

At the bottom of the screen, there is a navigation bar with icons for "Apps", "People", "Polls", "Questions", and "Chat". The "Polls" icon is highlighted with a red box, and an orange arrow points from the text box to it.

# Resources and references



1. [Food Traceability Rule](#)
2. [Subpart S](#)
3. [When to assign traceability lot codes](#)