

# Webinar

If a **Recall** Happened Tomorrow,  
Could You Prove **Complete Traceability in  
Minutes**, Not Days?

See you at 1 PM ET



# BEFORE WE GET STARTED

- We are recording today's webinar and will share the recording via email in a couple of days.
- We will also share the presentation, including relevant links, via email in a couple of days.
- We will send you a short survey, which we would greatly appreciate if you would take 1 minute to complete.
- Feel free to ask questions by writing in the Teams chat. We will ensure that the questions and answers are included in the email you will receive within 1-2 days.



**IF A RECALL  
HAPPENED TOMORROW  
COULD YOU PROVE  
COMPLETE TRACEABILITY  
IN MINUTES, NOT DAYS?**

**Tuesday, May 12, 2026**

**presented by**





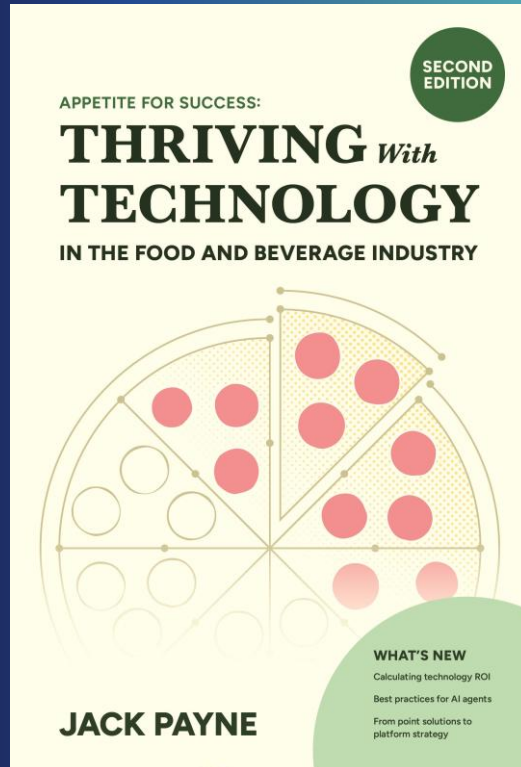
# JACK PAYNE

**Director Solution Consulting Food and Beverage, APTEAN**

**Industry Thought Leader, Frequent Speaker and Author**

## My Background

- 40+ Years in Manufacturing & Technology
- 30+ Years Focused on the Food & Beverage
  - Hundreds of Companies
  - Small Family-Owned Companies to Large Enterprises
  - North America and International (Latin America, EMEA, and APAC)



# The Future of Traceability in Food & Beverage

## TODAY'S AGENDA

01

FDA Smarter Food  
Safety Blueprint

02

FSMA Rule 204(d)

03

Preparing for FSMA 204

# I DON'T HAVE ANY FOODS ON THE FSMA 204 TRACEABILITY LIST

*This does NOT apply to me!*

*Why should I care?*



Your customers MAY require FSMA 204 compliance from ALL suppliers for ALL foods



Additional foods may be added to the Traceability List



Be prepared for FDA Product Tracing system in the future



# FDA SMARTER FOOD SAFETY BLUEPRINT



# FDA SMARTER FOOD SAFETY BLUEPRINT

## Foundational Pillars

**01** Tech-Enabled Traceability

**02** Smarter Tools and Approaches for Prevention and Outbreak Response

**03** New Business Models and Retail Modernization

**04** Food Safety Culture



# SMARTER FOOD SAFETY BLUEPRINT

## TECH-ENABLED TRACEABILITY INITIATIVES

**A** Product Tracing System

**B** Low or No-Cost Food Traceability

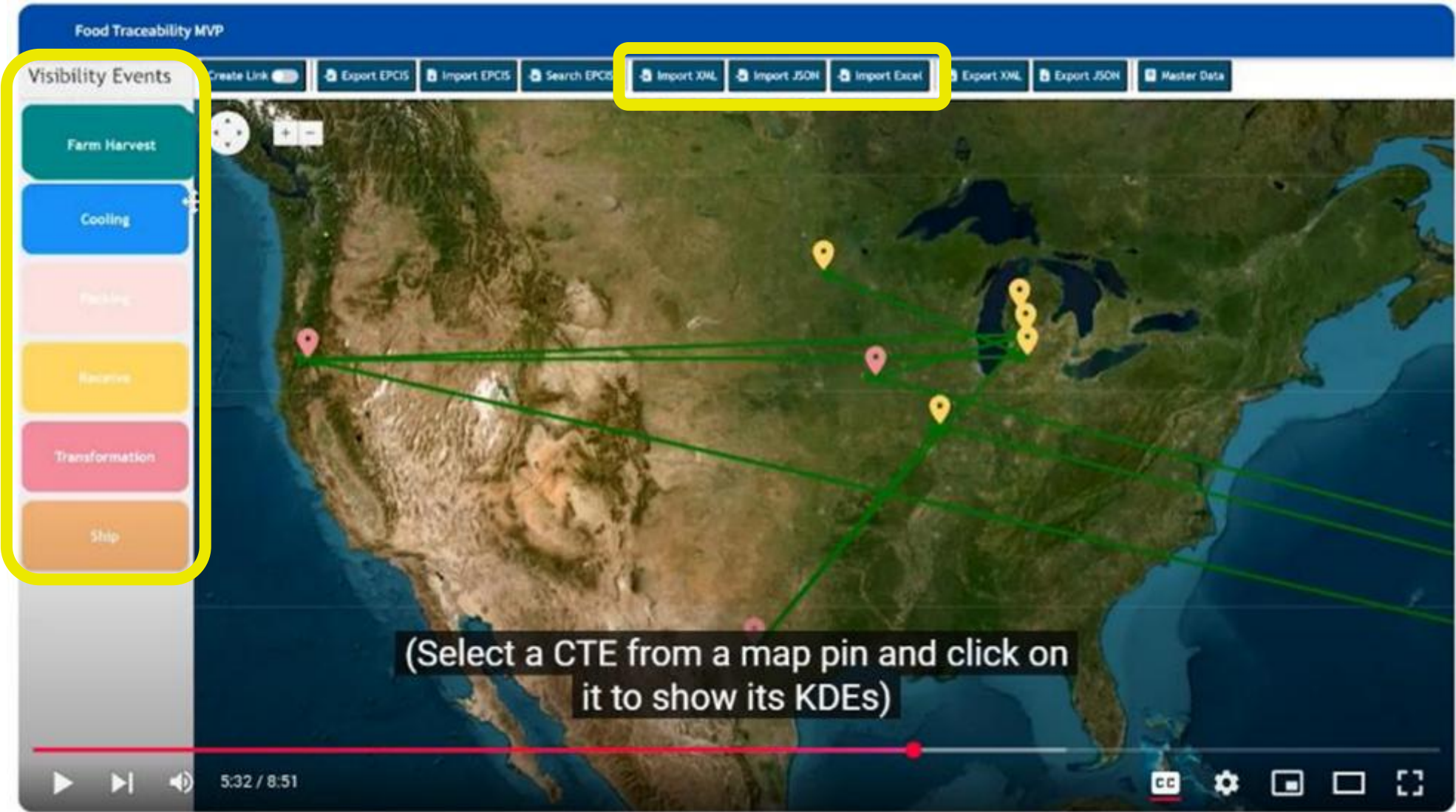
**C** Additional Traceability Records for Certain Foods



# PIZZA TRACEABILITY EXAMPLE



# FDA PRODUCT TRACING SYSTEM PROTOTYPE



# HOW WILL FDA ACHIEVE PRODUCT TRACING SYSTEM?

- Starts with FSMA 204 for Certain Foods
  - » Tomatoes, Vegetables, Cheeses (from Pizza Example)
  - » Sortable Spreadsheet within 24 hours (that can be uploaded into PTS)
- Expand FSMA 204 to Additional (or All) Foods
  - » Crusts and Meats? (Pizza example)
  - » Within 3-5 years, or 5-7 years?
- Require upload of Trace Records for All Foods
  - » Replace on demand sortable spreadsheet request?
  - » Within 7-10 years, 10-15 years?

# FSMA RULE 204(d)

## ADDITIONAL TRACEABILITY RECORDS FOR CERTAIN FOODS



# ADDITIONAL TRACEABILITY RECORDS FOR CERTAIN FOODS

01

## FOOD TRACEABILITY LIST - FTL

“High Risk Foods”

Additional recordkeeping requirements

02

## CRITICAL TRACKING EVENTS AND KEY DATA ELEMENTS CTE'S AND KDE'S

Activities from harvesting through shipping

03

## TRACEABILITY LOT CODE - TLC

Uniquely identify a traceability lot

04

## ELECTRONIC RECORDS

Provide sortable spreadsheet within 24 hours of FDA request

05

## TRACEABILITY PLAN

Establish and maintain a Traceability Plan

**COMPLIANCE DATE  
EXTENDED TO  
JULY 20, 2028**



# FOOD TRACEABILITY LIST

- » Cheeses (other than hard cheese)
- » Shell Eggs
- » Nut Butters
- » Cucumbers (fresh)
- » Herbs (fresh)
- » Leafy Greens (fresh)
- » Leafy Greens (fresh-cut)
- » Melons (fresh)
- » Peppers (fresh)
- » Sprouts (fresh)
- » Tomatoes
- » Tropical Tree Fruits (fresh)
- » Fruits (fresh-cut)
- » Vegetables (fresh-cut)
- » Finfish (fresh, frozen)
- » Smoked Finfish
- » Crustaceans (fresh, frozen)
- » Shellfish
- » Ready to eat deli salads



# TRACEABILITY LOT CODE

## 2. Traceability Lot Code

*Traceability lot code* (TLC) means a descriptor, often alphanumeric, used to uniquely identify a traceability lot within the records of the firm that assigned the traceability lot code.

You must assign a traceability lot code to a food on the Food Traceability List (FTL) when you do any of the following: initially pack a raw agricultural commodity (RAC) other than a food obtained from a fishing vessel; perform the first land-based receiving of a food obtained from a fishing vessel; or transform a food. If you receive an FTL food from an entity that is exempt from the final rule, you must assign a TLC if one has not already been assigned (unless you are a retail food establishment or restaurant). Otherwise, you must not establish a new TLC when you conduct other activities (e.g., shipping) for a food on the Food Traceability List.

Once a food has been assigned a TLC, the records required at each Critical Tracking Event (CTE) must include that TLC. All of the Key Data Elements (KDEs), including the TLC, must be linked to the relevant traceability lot.

## What are some examples of traceability lot codes?

Several food industry-supported traceability initiatives offer best practices and standards for uniquely identifying a lot of food using a combination of a globally unique product identifier, firm-assigned internal lot code, and standard date code. Other examples include a Julian date, a lot code, batch code or other production code. This information, taken together, could be used as a traceability lot code, provided it meets the definition of “traceability lot code” in the final rule. Some examples of traceability lot codes are below:

Examples of traceability lot codes	
<b>(01)04562135785133</b> <b>(17)140704 (10) DE-456</b> GS1-128 Example	<b>1147M2023213</b> ┌──┬──┬──┬──┬──┬──┐ 1. 2. 3.
<b>475123C</b> 6-digit code + letter to represent grower/manufacturing location	1. Product code 2. Facility 3. Julian date
<b>BFCA179A152023213</b> ┌──┬──┬──┬──┬──┬──┐ 1. 2. 3. 4. 5.	<b>134AD5607</b> Randomized alphanumeric code generated by firm's traceability system
1. Company name 2. Production location 3. Product 4. Grower 5. Julian date	

# TRACEABILITY PLAN

## Food Traceability Rule: Critical Tracking Events (CTEs) and Key Data Elements (KDEs)



Harvesting

Cooling  
(before Initial  
Packing)

Initial  
Packing  
(RAC)

First Land-Based  
Receiver

Shipping

Receiving

Transformation

Traceability  
Plan

### Traceability Plan

*Required for all persons covered by the rule*

- Description of the procedures you use to maintain the required records, including the format and location of the records
- Description of the procedures you use to identify foods on the FTL that you manufacture, process, pack or hold
- Description of how you assign traceability lot codes to foods on the FTL, if applicable
- Statement identifying a point of contact for questions regarding your traceability plan and records
- If you grow or raise a food on the FTL (other than eggs), a farm map showing the areas in which you grow or raise such foods
  - The farm map must show the location and name of each field (or other growing area) in which you grow a food on the FTL, including geographic coordinates and any other information needed to identify the location of each field or growing area
  - For aquaculture farms, the farm map must show the location and name of each container (e.g., pond, pool, tank, cage) in which you raise seafood on the FTL, including the geographic coordinates and any other information needed to identify the location of each container
- You must update your traceability plan as needed to ensure that the information reflects your current practices and to ensure you are in compliance with the rule
- You must retain your previous traceability plan for 2 years after you update the plan



# CRITICAL TRACKING EVENTS

## Food Traceability Rule: Critical Tracking Events (CTEs) and Key Data Elements (KDEs)



### 7 Critical Tracking Events

The Food Traceability Rule requires persons who manufacture, process, pack, or hold foods on the Food Traceability List (FTL) to maintain and provide to their supply chain partners specific information (key data elements or KDEs) for certain critical tracking events (CTEs) in the food's supply chain. This framework forms the foundation for effective and efficient tracing and clearly communicates the information that FDA needs to perform such tracing.

The information that firms must keep and send forward under the rule varies depending on the type of supply chain activities they perform with respect to an FTL food, from harvesting or production of the food through processing, distribution, and receipt at retail or other point of service. Central to the proposed requirements is the assignment, recording, and sharing of traceability lot codes for FTL foods, as well as linking these lot codes to other information identifying the foods as they move through the supply chain.

Graphics on the subsequent pages provide readers with a list of KDEs required for each CTE performed.



# KEY DATA ELEMENTS - RECEIVING

Food Traceability Rule: Critical Tracking Events (CTEs) and Key Data Elements (KDEs)

FDA U.S. FOOD & DRUG ADMINISTRATION

Harvesting   Cooling (before Initial Packing)   Initial Packing (RAC)   First Land-Based Receiver   Shipping   **Receiving**   Transformation   Traceability Plan

**Receiving KDEs**  
*KDEs must be linked to the traceability lot for the food*

- Traceability lot code for the food
- Quantity and unit of measure of the food
- Product description for the food
- Location description for the immediate previous source (other than a transporter) for the food
- Location description for where the food was received
- Date you received the food
- Location description for the traceability lot code source or the traceability lot code source reference
- Reference document type and reference document number

**Receiving KDEs**  
*For food you receive from a person who is exempt from the rule*  
*KDEs must be linked to the traceability lot for the food*

- Traceability lot code for the food, which you must assign if one has not already been assigned (does not apply to RFEs or restaurants)
- Quantity and unit of measure of the food
- Product description for the food
- Location description for the immediate previous source (other than a transporter) for the food
- Location description for where the food was received (i.e., traceability lot code source) and (if applicable) traceability lot code source reference
- Date you received the food
- Reference document type and reference document number

\*This section does not apply to receipt of a food that occurs before the food is initially packed (if the food is a raw agricultural commodity not obtained from a fishing vessel) or to the receipt of a food by the first land-based receiver (if the food is obtained from a fishing vessel).

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# KEY DATA ELEMENTS - TRANSFORMATION

## Food Traceability Rule: Critical Tracking Events (CTEs) and Key Data Elements (KDEs)



Harvesting

Cooling  
(before Initial  
Packing)

Initial  
Packing  
(RAC)

First Land-Based  
Receiver

Shipping

Receiving

Transformation

Traceability  
Plan

### Transformation KDEs

#### *FTL food(s) used as ingredient(s)*

*KDEs must be linked to the new traceability lot for the food*

- Traceability lot code for the food
- 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

### Transformation KDEs

#### *New food produced*

*KDEs must be linked to the new traceability lot for the food*

- New traceability lot code for the food
- Location description for where you transformed the food (i.e., the traceability lot code source), and (if applicable) the traceability lot code reference
- Date transformation was completed
- Product description for the food
- Quantity and unit of measure of the food
- Reference document type and reference document number

For RACs (other than a food obtained from a fishing vessel) that were not initially packed prior to your transformation of the food, you must maintain records containing the information specified in § 1.1330(a) or (c).

For sprouts that were not initially packed prior to your transformation of the food, you must maintain records containing the information specified in § 1.1330(a) or (c), and also § 1.1330(b).

\*This section does not apply to retail food establishments and restaurants with respect to foods they do not ship (e.g., foods they sell or send directly to consumers).

# KEY DATA ELEMENTS - SHIPPING

Food Traceability Rule: Critical Tracking Events (CTEs) and Key Data Elements (KDEs)



Harvesting

Cooling  
(before Initial  
Packing)

Initial  
Packing  
(RAC)

First Land-Based  
Receiver

Shipping

Receiving

Transformation

Traceability  
Plan

## Shipping KDEs (maintain and provide)

*KDEs must be linked to the traceability lot for the food*

- Traceability lot code for the food
- Quantity and unit of measure of the food
- Product description for the food
- Location description for the immediate subsequent recipient (other than a transporter) of the food
- Location description for the location from which you shipped the food
- Date you shipped the food
- Location description for the traceability lot code source or the traceability lot code source reference
- Reference document type and reference document number (maintain only)

\*This section does not apply to the shipment of a food that occurs before the food is initially packed (if the food is a raw agricultural commodity not obtained from a fishing vessel).



# ELECTRONIC SORTABLE SPREADSHEET UPON REQUEST

## Electronic Sortable Spreadsheet

This electronic sortable spreadsheet template can be used to fulfill data submission requests for FDA in accordance with the Food Traceability Rule as outlined in 21 CFR Part 1 Subpart S. ***This template is presented for illustrative purposes. You are not required to use this specific electronic sortable spreadsheet template to comply with the rule.***

Each tab represents a critical tracking event (CTE) and contains all of the corresponding key data elements (KDEs) for that CTE. Within each tab, each column header represents a required KDE and has a hyperlink to the corresponding provision for your reference. You can also refer to 21 CFR 1.1310 for any definitions related to



# ELECTRONIC SORTABLE SPREADSHEET

Traceability Lot Code <small>(The Traceability Lot Code assigned to the food by the Initial Packer / First Land-Based Receiver / person who Transformed the Food)</small>	Quantity <small>(e.g., 6, 25, 100, 200)</small>	Unit of Measure <small>(e.g., cases, reusable plastic containers, tanks, pounds)</small>	Product Description - Product Name <small>(Marketed Brand of this food product)</small>	Product Description - Brand Name (if applicable)	Product Description - Commodity (if applicable) <small>(e.g., Melon, Lettuce, Tuna, Soft Cheese)</small>	Product Description - Variety (if applicable) <small>(e.g., Small White Honeydew, Romaine, Albacore, Queso Fresco)</small>	Product Description - Packaging Size <small>(Packaging Configuration OR Count OR Weight + Unit of Measure)</small>	Product Description - Packaging Style <small>(e.g., Cartons, Trays, Cases, Clamshell, etc.)</small>	Location Description for the Immediate Previous Source (other than a transporter) - Business Name <small>(Name of the Company Operating the Location that the Food Arrived from)</small>	Location Description for the Immediate Previous Source (other than a transporter) - Phone Number <small>(Phone Number to Call the Location that the Food Arrived from)</small>	Location Description for the Immediate Previous Source (other than a transporter) - Street Address or Geographic Coordinates <small>(Street Address or Geographic Coordinates of the Actual Location from which the food was sent)</small>	Location Description for the Immediate Previous Source (other than a transporter) - City
GTIN: 0952400059109 + Lot: 1303479	100	cases	Jamaica Crab - Frozen 1lb Land Crab	Jamaica Crab	Crab	Land Crab	10 x 1lb	bags	Chipper's Grocery - DC-GRE3	+1 864 555 8888	1234 Myrtle St	Greenville
Culinary Herbs Item# 20398 + Lot# 27149FP5C	5	cases	Conventional Fresh Flat-leaf Italian Parsley - 5 lb	Culinary Herbs	Herbs (fresh)	Italian Parsley	5lb	case	The Glades Long Term Care Facility	+1 567 555 7167	567 Pryne Ave	Toledo
(01)03212345678906(10)FPP16-092420	10	Cases	Fresh Processor Brand, Cut Cantaloupe, 12X1 Lb Bags	Fresh Processor Brand	Melons (fresh)	Cantaloupe Melons	12 x 1LB	bags	FoodsDelivered - Distribution Services Whse E MI	+1.517.555.1111	111 First St	Springfield
EAN - 03812345678908 Lot - EN1127BOQFUM	4,500	Cases	Gibraltar Smoked Anchovy Filets 18 x 3.8oz	Gibraltar	Smoked Finfish	Anchovy	18 x 3.8 oz	Vacuum packed sleeves	Markel Five & Dime - NOLA Import DC	+1 318 555 2222	456 Baton Rouge Hwy	Slidell

# FSMA 204(D) CHECKLIST

Auditing your FSMA 204 readiness

01

## TRACEABILITY PLAN

- Do you have an acceptable Traceability Plan?
- Do you need to update your Traceability Plan?

02

## INTERNAL DECISIONS

- All products and lots or just those on the Traceability Food List?
- Are customers requiring compliance for all suppliers and all products?

03

## TECHNOLOGY AND SYSTEMS

- Do you have technology and systems that can record CTE's and KDE's?
- Do you need to upgrade existing solutions or implement new systems?
- Do you need to implement technology on the floor like barcoding and scanning to efficiently and accurately record the KDE's for all CTE's?



# FSMA 204(D) CHECKLIST

Auditing your FSMA 204 readiness

04

## FSMA 204 DATA ELEMENTS

- Critical Tracking Events – identified and recording all CTEs?
- Key Data Elements – identified and recording the KDEs for each CTE?
- Traceability Lot Code – how will you track supplier's TLCs?
- How will you assign TLCs?

05

## SUPPLIERS AND CUSTOMERS

- Are your suppliers providing Traceability Lot Codes?
- Can you provide Traceability Lot Codes to customers?

06

## EMPLOYEES

- Are your employees properly trained and tested?



# PREPARING FOR FSMA 204

Audit your FSMA 204 readiness

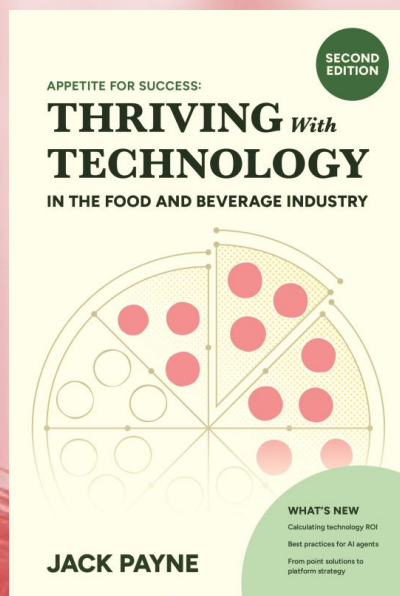
**07 PRACTICE, PRACTICE, PRACTICE**



# Q&A and Survey

Complete the post webinar survey will receive a personally signed copy of Jack Payne's book, Thriving with Technology in the Food and Beverage Industry.

<https://forms.office.com/e/bKEncBTteQ>





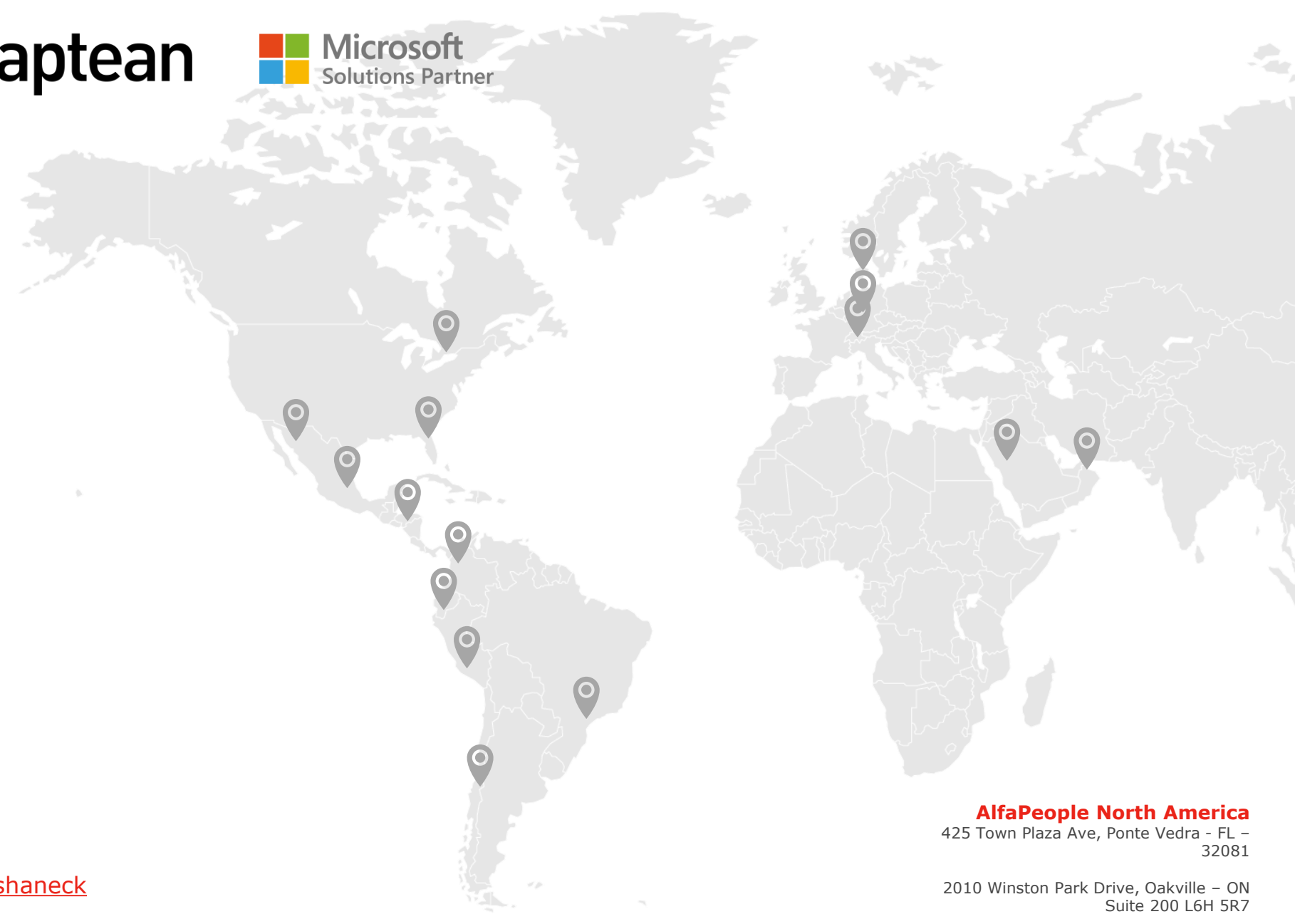
# Thank you

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