



FDA Food Traceability Regulation August 2026

FDA Food Safety Topics

- Background: Food Safety Modernization Act (FSMA)
- Food Traceability List (FTL) Food Products
- Key Data Elements and Critical Tracking Events
- Food Tracing Challenges for Distributors
- Barcodes: UPC, GS1-128, Two-Dimensional, Pallet
- Barcode Scanners
- Guidance Suggestions to Prepare for FSMA

Food Traceability Regulation Background

- Food Safety Modernization Act (FSMA) Enacted 2011
- FSMA Section 204(d) Requires Tracing Key Foods By:
 - Farmers
 - Food Manufacturers
 - Food Processors
 - Distributors
 - Retailers
 - Restaurants
- Extended Compliance Date: July 20, 2028

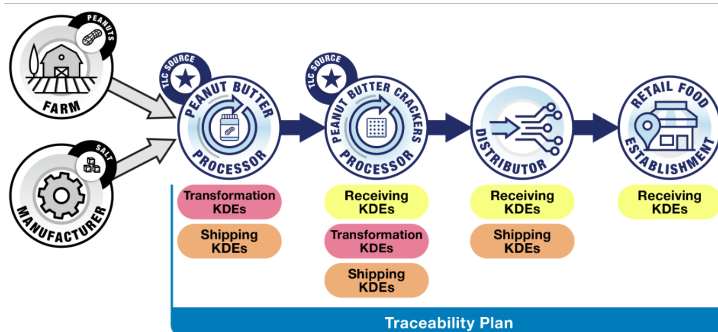
Food Traceability List Products

Fruit & Produce	Dairy/Nut Butters	Deli Salads	Meat/Seafood
Cucumbers	Cheeses (Soft)	Ready-to-Eat	Finfish
Herbs & Leafy Greens (Fresh)	Shell Eggs (Chicken)	Refrigerated	Shrimp, Lobster, Crayfish, Crab
Melons (Fresh)	All Nut Butters	Including	Clams
Peppers (Fresh)	• Shelf Stable	• Pasta Salad	Oysters
Sprouts (Fresh)	• Refrigerated	• Egg Salad	Mussels
Tomatoes (Fresh)	• Frozen	• Potato Salad	
Tropical Tree Fruits (Fresh)	• Peanut Butter, Almond Butter	• Seafood Salad	
Fresh Cut Fruits and Vegetables (All)	• Hazelnut Butter, Cashew Butter		

Key Data Elements & Critical Tracking Elements

- FSMA Requires Scanning/Capturing Key Data Elements (KDEs)
- Capturing Critical Tracking Events (CTEs): Receiving for Retailers.
- KDE Information Required to be Traced and Captured:
 - Global Trade Item Number (GTIN): Manufacturer & Product Data
 - Traceability Lot Code (TLC): Identifies Batch of Product
 - TLC Source Reference (TLCSR): Origin of Product
 - Shipping and Receiving Dates
 - Quantity of Food Product and Weight
- Key Documents (e.g., PO, Bill of Lading, Invoice)
- Electronic Sortable Spreadsheet Must be Provided to FDA Within 24 Hours of Agency Request; Data Must be Retained for 2 Years

Food Tracing Diagram (Peanut Butter Crackers)



Food Tracing Limitations

- **FSMA 204(d) Requires Lot Level (TLC) Tracing**
- **Distributors Not Required to Trace by Cases**
 - Scanning Each Case Too Labor/Time Intensive
 - Up to 90% of Pallets Received by Distributors are Mixed
- **Inner Packs and Eaches are Not Required to be Traced**
- **FDA Now Concerned about Inner Packs/Eaches**

Inner Packs, Eaches and Totes



UPC Barcodes

- **UPC Barcodes Have Insufficient Space for FDA Food Tracing**
- **UPC Barcodes Are One Dimensional (Vertical Lines/Spaces)**
- **UPC Only Contains 12 to 14 Digits and Embeds a GTIN**
- **A GTIN (Global Trade Item Number) is Embedded in UPC**
- **UPC's Limited Number of Digits Prevent Embedding All KDEs Required by FSMA 204(d)**

Example of UPC Barcode

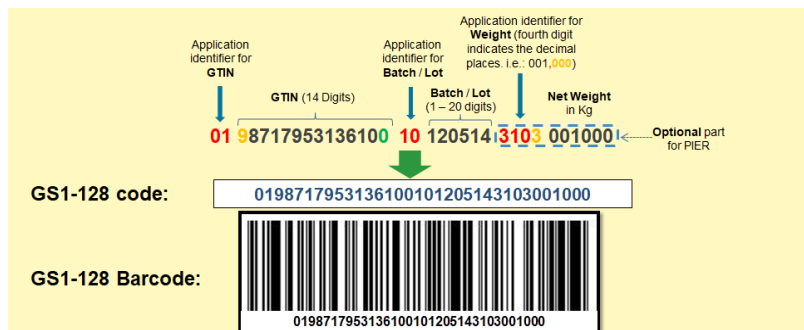
North American 12 Digit UPC Barcode with GTIN



GS1 Global ID & Tracing Standard

- **GS1: Global Organization for Product Identification/Tracing**
 - Industry, Governments, Regulators and Associations
 - Develop Standardized Product ID, Tracing & Data Exchange
- **GS1-128 Barcode Can Include Most Section 204(d) KDEs**
- **GS1-128 Barcode is One Dimensional**
 - GTIN
 - Traceability Lot Code (TLC)
 - Date of Manufacture, Origin of Product, Shipping/Receipt Dates, Destination, Weight, and/or Expiration Date
- **GS1-128 Barcode Limit: 48 Digit Limit; 6.5" Long**

Example of GS1-128 Barcode



Two-Dimensional (2D) Barcodes

- GS1 Standards Also Include Two-Dimensional (2D) Barcodes
- 2D Barcodes Needed Because Consumers Demanding More Product Information and FSMA 204(d) is KDE Data Intensive
- 2D Barcode Characteristics
 - Encodes Data Both Horizontally and Vertically
 - Uses Black Boxes and White Spaces to Embed Data
 - Data Capacity Significantly More Data than UPC Barcode
 - Scanning Errors Reduced versus UPC Scanning
- Transition: Manufacturers Print UPC and 2Ds on a Product

Examples of 2D Barcodes

- GS1 QR Code Barcode with Digital Link
 - Can Embed More than 7,000 Characters/Digits
 - GTIN, TLC, TLCSR, Origin, Dates, Quantity/Weight
 - Link to Manufacturer Website
 - Inventory Management Capabilities
- GS1 Data Matrix Barcode With Application Identifiers
 - Same Attributes as GS1 QR Code Barcode
 - (Numbers): Application Identifiers
 - (01) = GTIN
 - (10) = Lot or Batch Number



GTIN (01): 03453120000011
EXPIRY: 2019-11-25
BATCH/LOT (10): ABCD1234

Comparison of Barcodes

UPC Barcode Today



Current Data Standard

- Manufacturer Number
- Product Item Number

GS1 QR/Data Matrix Barcodes



GTIN (01): 03453120000011
EXPIRY: 2019-11-25
BATCH/LOT (10): ABCD1234

New Data Standard

- GTIN
- TLC/TLC Source
- Manufacture, Shipping, and Expiration Dates
- Product Quantity/Weight
- Website URL

Barcode Scanners

- **Laser Scanners**
 - Red Laser Light Scans Barcodes
 - Read and Decode Only UPC and Partial GS1-128 Barcode
- **Optical Image Scanners**
 - Read UPC, GS1-128, QR and Data Matrix Barcodes
 - Cell Phone Camera is an Optical Image Scanner

Possible Tracing Solutions

1. **Definitive Model**: Scanning Every Case Shipped to a Store; FSMA Does Not Require Case Scanning
2. **Range of Lot Codes Model**: Based on Warehouse Inventory System, Estimates a Range of Multiple Lot Codes of a Product That May Have Been Shipped
3. **Probabilistic Model**: Estimates Probability, a Percent, of What Lot Code of a Food Product May Have Been Shipped to Which Store

Possible Tracing Solutions

4. **Transformation Model**: The Wholesaler Assigns a Pallet that Has Multiple Products and Lot Codes a New Single Lot Code and this New Lot Code is Transferred to a Sales Order.
5. **Imprinting TLC and TLC Source Model**: Manufacturer or Supplier Imprints the TLC, TLCS (manufacturer facility or plant identification number) and Expiration Date on Case Labels, Inner Packs, and Individual Packages of Products

Guidance Suggestions

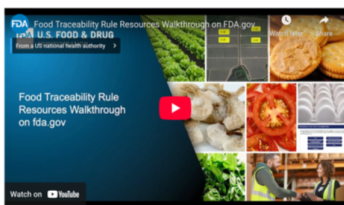
1. Form Company FSMA Implementation Team
 - IT Staff (Software, Data Capture, Sortable Spreadsheet)
 - Purchasing Staff (FTL Foods Purchased)
 - Store Staff (Receiving, Stocking, Scanning)
2. Read the FDA “At-A-Glance” FSMA Document
3. Use the Food Traceability List Chart to Create a List of Food Products Your Wholesale Business Stocks

Guidance Suggestions

4. Thoroughly Review FDA “FSMA Final Rule” Webpage

<https://www.fda.gov/food/food-safety-modernization-act-fsma/fsma-final-rule-requirements-additional-traceability-records-certain-food>

FSMA Final Rule on Requirements for Additional Traceability Records for Certain Foods



Guidance Suggestions

5. Identify Key Data Elements (KDEs)
 - What KDEs Does Your Store Capture/Retain Now? (GTIN, TLC, TLCSR, Origin, Receiving Dates, Quantity)
 - What Other KDEs Will Your Business Need to Capture?
6. Work with Software Solution Provider(s)
 - Software Must Capture and Store KDEs.
 - Software Must Support 2+ Years of Storing KDE Data.
 - Software Must Be Able to Create Sortable Spreadsheet

Guidance Suggestions

7. Review the FDA “Traceability Plan” Template Document and Draft a Traceability Plan
 - Describe Recordkeeping Procedures
 - Explain Process Used to Identify FTL Products
 - Identify Key Contact Person
 - Review and Update Traceability Plan Regularly
8. Budget for Scanning Equipment and Software in 2027
9. Plan to Train Employees in 2027 or early 2028



Questions

Presented by Tom Briant



Thomas Briant is an attorney who serves as the Executive Director of the Minnesota Wholesale Marketers Association and a government policy advisor to the Convenience Distribution Association. He is also a member of the Partnership for Food Traceability Board of Directors. In these roles, he has become a specialist on Section 204(d) of the Food Safety Modernization Act which requires new traceability and recordkeeping requirements for certain high risk foods for every segment of the food supply chain, including wholesale distributors.

The FDA Food Traceability Rule At-A-Glance



Background

The Food Traceability Rule (FTR) establishes additional traceability recordkeeping requirements (beyond what is already required in existing regulations) for persons who manufacture, process, pack, or hold foods on the [Food Traceability List](#) (FTL).

The new requirements will allow for faster identification and removal of potentially contaminated food from the market, resulting in fewer foodborne illnesses and deaths.

The rule applies to domestic entities as well as foreign entities producing food for U.S. consumption. The FTR contains certain exemptions and partial exemptions. See FDA's [online exemptions tool](#) for more information.

Food Traceability List (FTL)

The recordkeeping requirements in the rule apply to the foods specifically listed on the FTL, and to foods that contain listed foods as ingredients, provided that the listed food that is used as an ingredient remains in the same form (e.g., fresh) in which it appears on the list.



Food Traceability List

Cheese (made from pasteurized milk),
fresh soft or soft unripened

Cheese (made from pasteurized milk),
soft ripened or semi-soft

Cheese (made from unpasteurized milk),
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 (fresh)

Tropical tree fruits (fresh)

Fruits (fresh-cut)

Vegetables (fresh-cut)

Finfish, histamine-producing species
(fresh, frozen, and previously frozen)

Finfish, species potentially contaminated with
ciguatoxin (fresh, frozen, and previously frozen)

Finfish, species not associated with histamine or
ciguatoxin (fresh, frozen, and previously frozen)

Smoked finfish
(refrigerated, frozen, and previously frozen)

Crustaceans (fresh, frozen, and previously frozen)

Molluscan shellfish, bivalves
(fresh, frozen, and previously frozen)

Ready-to-eat deli salads (refrigerated)

What are the requirements of the rule?

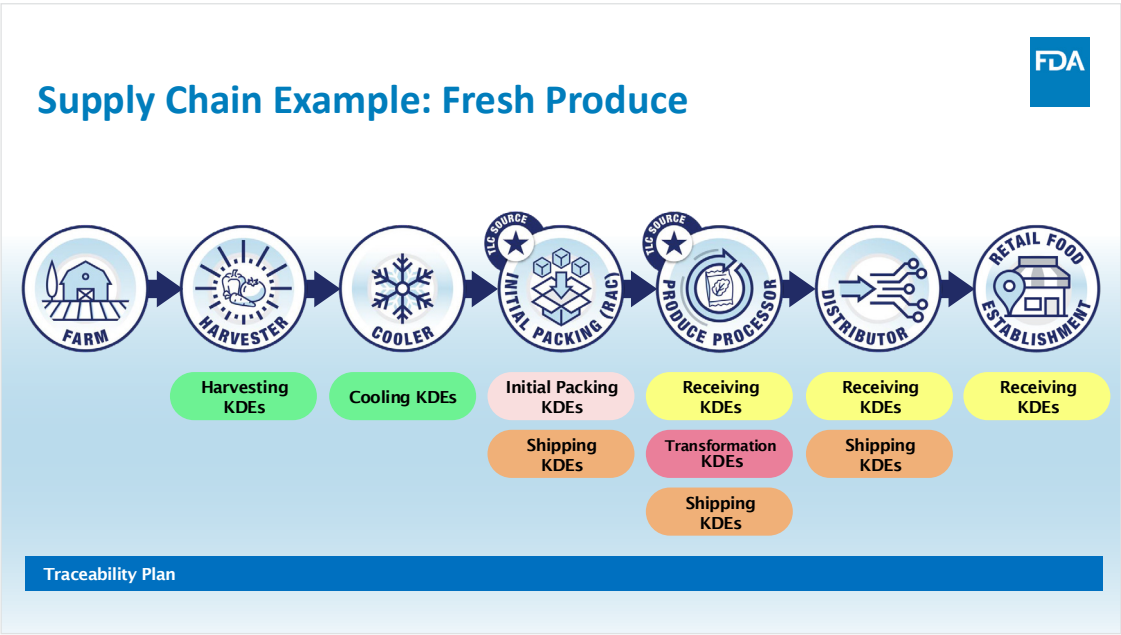
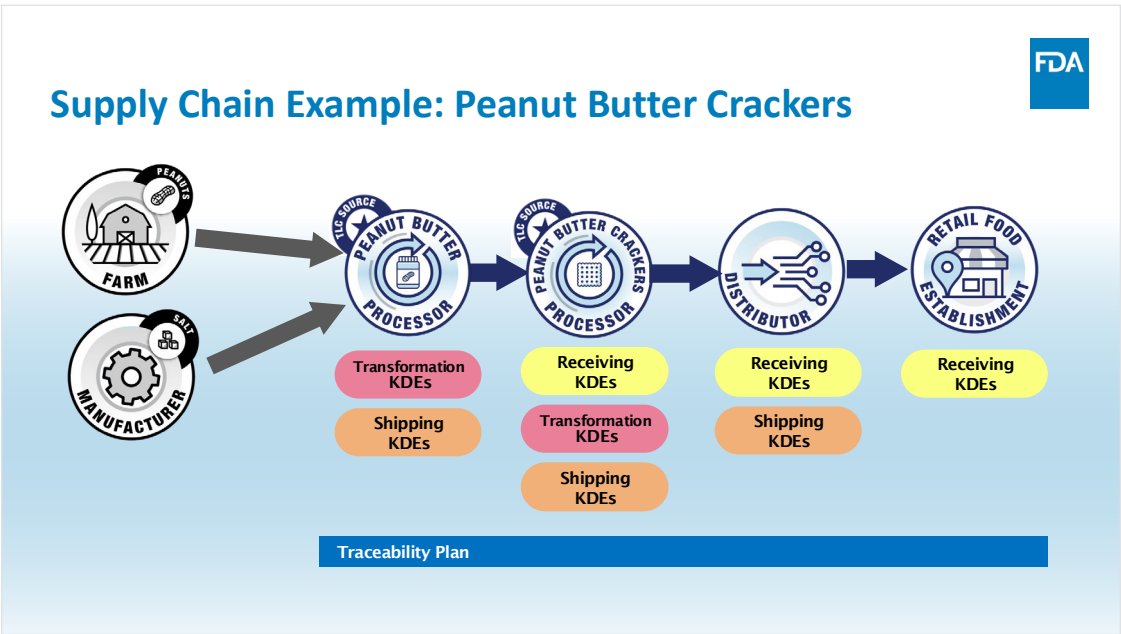
Critical Tracking Events and Key Data Elements

The rule identifies Critical Tracking Events (CTEs) along the supply chain where it is necessary to collect traceability information. These are:

Harvesting	Cooling (Before Initial Packing)	Initial Packing (RAC)	First Land-Based Receiver	Shipping	Receiving	Transformation
------------	----------------------------------	-----------------------	---------------------------	----------	-----------	----------------

For each CTE an entity conducts, the rule requires that [Key Data Elements \(KDEs\)](#) are maintained. The KDEs required will vary depending on the CTE that is being performed.

Below are two supply chain examples that demonstrate the CTEs at different points in the supply chain where KDEs must be maintained. Additional examples are available on [FDA’s Food Traceability Rule webpage](#).



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 TLC to a food on the FTL when you do any of the following:

- Initial Packing
- First Land-Based Receiving
- Transformation
- Receiving an FTL food from someone who did not assign a TLC because they are exempt (not required if you are a Retail Food Establishment (RFE) or restaurant)

You cannot change the TLC in any other situation. It stays the same as the product moves through the supply chain. All of the KDEs, including the TLC, must be linked to the relevant traceability lot of the food.

How to get started

1. Do you manufacture, process, pack or hold a food on the [Food Traceability List](#)?
2. Do [any full or partial exemptions from the Food Traceability Rule](#) apply to your situation?
3. What [Critical Tracking Events \(CTEs\)](#) do you conduct?
4. What [Key Data Elements \(KDEs\)](#) do you already maintain? What additional KDEs do you need to maintain to be in compliance with the rule?
5. Develop a [traceability plan](#).
6. Talk with your supply chain partners. Understand the recordkeeping practices in your supply chains. Determine how best to communicate required information. Discuss potential solutions.

Traceability Plan

The traceability plan describes your traceability procedures and helps FDA understand how your firm is maintaining the required records. Examples of traceability plans are available on [FDA's Food Traceability Rule webpage](#), and the full requirements are outlined in [section 1.1315](#) of the FTR. You must establish and maintain a traceability plan containing:

1. Procedures you use to maintain the required records, including the format and location;
2. Procedures you use to identify foods on the FTL that you handle;
3. How you assign traceability lot codes to foods on the FTL, if applicable;
4. A point of contact for questions regarding your traceability plan and records; and
5. A farm map showing the areas in which you grow or raise foods on the FTL, if applicable.

Additional Requirements

Records must be maintained as original paper or electronic records, or true copies.

Records must be available within 24 hours after a request by FDA, unless FDA agrees to a longer timeline. You do not need to duplicate the records you already keep, and you do not need to keep all of the required information in a single set of records; you may supplement your existing records as necessary so that you have all of the required information.

During an outbreak, recall, or other threat to public health, the traceability information must be provided in an **electronic sortable spreadsheet** within 24 hours (or within some reasonable time to which FDA has agreed) of a request by FDA. An electronic sortable spreadsheet template is available on [FDA's Food Traceability Rule webpage](#).

Compliance Date

The compliance date for all persons subject to the rule is **January 20, 2026**. Routine inspections under the Food Traceability Rule will not begin until 2027, to give covered entities additional time to work together and ensure that traceability information is being maintained and shared within supply chains per the requirements of the rule. While FDA is not initiating routine inspections until 2027, we may do inspections on a for-cause basis, such as during an outbreak investigation, once the compliance date is reached.

Additional Resources:

- [FDA Food Traceability Final Rule webpage](#) (includes resources in Spanish, Chinese, French, Thai, Vietnamese, and Indonesian)
- [Food Traceability List webpage](#)
- [Frequently Asked Questions webpage](#)
- Questions related to the rule should be sent to the [FSMA Technical Assistance Network](#)
- Access to resources:
[FSMA Final Rule on Requirements for Additional Traceability Records for Certain Foods](#)



FDA Food Traceability Chart [Section 204(d) Final Rule]

Food Traceability List (FTL)	Foods Subject to Section 204(d) Final Rule	Foods Not Subject to Section 204(d) Final Rule
Cheeses, other than hard cheeses, specifically:		"Hard Cheeses" as defined in 21 CFR 133.150 [See Code of Regulations § 133.150 definition of "hard cheese" below]. Colby cheese as defined in 21 CFR 133.118, and caciocavallo siciliano as defined in 21 CFR 133.111. Examples of hard cheese include, but are not limited to, cheddar, Romano, and parmesan.
Cheese (made from pasteurized milk), fresh soft or soft unripened	Includes soft unripened/fresh soft cheeses. Examples include, but are not limited to, cottage cheese,* chevre, cream cheese, mascarpone, ricotta, queso blanco, queso fresco, queso de crema, and queso de puna. *Note: On February 19, 2026, the FDA issued a notice exempting Grade "A" cottage cheese that appears on the Interstate Milk Shippers (IMS) List from FSMA Section 204(d).	Cheeses that are frozen or previously frozen, shelf stable at ambient temperature, or aseptically processed and packaged.
Cheese (made from pasteurized milk), soft ripened or semi-soft	Includes soft ripened/semi-soft cheeses. Examples include, but are not limited to, brie, camembert, feta, mozzarella, taleggio, blue, brick, fontina, Monterey jack, and muenster.	Cheeses that are frozen or previously frozen, shelf stable at ambient temperature, or aseptically processed and packaged.
Cheese (made from unpasteurized milk), other than hard cheese	Includes all cheeses made with unpasteurized milk, other than hard cheeses.	Hard cheeses; plus cheeses that are frozen or previously frozen, shelf stable at ambient temperature, or aseptically processed and packaged.
Shell eggs	Shell egg means the egg of the domesticated chicken.	
Nut butters	Includes all types of tree nut and peanut butters. Includes all forms of nut butters, including shelf stable, refrigerated, frozen, and previously frozen products. Examples include, but are not limited to, almond, cashew, chestnut, coconut, hazelnut, peanut butter, pistachio, and walnut butters.	Soy or seed butters.
Cucumbers (fresh)	Includes all varieties of fresh cucumbers.	The designation "fresh" does not include previously frozen forms of the food.
Herbs (fresh)	Includes all types of fresh herbs. Examples include, but are not limited to, parsley, cilantro, and basil.	Herbs listed in 21 CFR 112.2(a)(1), including dill seeds, dill weed, peppermint, and ginger are exempt from the requirements of the rule under 21 CFR 1.1305(e). [See text of 21 CFR 112.2(a)(1) below].

Food Traceability List (FTL)	Foods Subject to Section 204(d) Final Rule	Foods Not Subject to Section 204(d) Final Rule
Leafy greens(fresh)	Includes all types of fresh leafy greens. Examples include, but are not limited to, arugula, baby leaf, butter lettuce, chard, chicory, endive, escarole, green leaf, iceberg lettuce, kale, red leaf, pak choi/bok choi, Romaine, sorrel, spinach, and watercress.	Does not include whole head cabbages such as green cabbage, red cabbage, or savoy cabbage. Does not include banana leaf, grape leaf, and leaves that are grown on trees. Leafy greens listed in 21 CFR § 112.2(a)(1), such as collards, are exempt from the requirements of the rule under § 1.1305(e).
Leafy greens(fresh-cut)	Includes all types of fresh-cut leafy greens, including single and mixed greens.	The designation “fresh-cut” does not include previously frozen forms of the food.
Melons (fresh)	Includes all types of fresh melons. Examples include, but are not limited to, cantaloupe, honeydew, muskmelon, and watermelon.	
Peppers (fresh)	Includes all varieties of fresh peppers.	
Sprouts (fresh)	Includes all varieties of fresh sprouts (irrespective of seed source), including single and mixed sprouts. Examples include, but are not limited to, alfalfa sprouts, allium sprouts, bean sprouts, broccoli sprouts, clover sprouts, radish sprouts, alfalfa & radish sprouts, and other fresh sprouted grains, nuts, and seeds.	
Tomatoes (fresh)	Includes all varieties of fresh tomatoes.	
Tropical tree fruits (fresh)	Includes all types of fresh tropical tree fruit. Examples include, but are not limited to, mango, papaya, mamey, guava, lychee, jackfruit, and starfruit.	Does not include non-tree fruits such as bananas, pineapple, dates, soursop, jujube, passionfruit, Loquat, pomegranate, and sapodilla. Does not include tree nuts such as coconut. Does not include pit fruits such as avocado. Does not include citrus, such as orange, clementine, tangerine, mandarins, lemon, lime, citron, grapefruit, kumquat, and pomelo. Tropical tree fruits listed in 21 CFR § 112.2(a)(1), such as figs, are exempt from the requirements of the rule under § 1.1305(e).
Fruits (freshcut)	Includes all types of fresh-cut fruits.	Fruits listed in 21 CFR § 112.2(a)(1) are exempt from the requirements of the rule under § 1.1305(e), specifically cherries, cranberries, figs, and dates.

Food Traceability List (FTL)	Foods Subject to Section 204(d) Final Rule	Foods Not Subject to Section 204(d) Final Rule
Vegetables other than leafy greens (fresh cut)	Includes all types of fresh-cut vegetables other than leafy greens.	Vegetables listed in 21 CFR§ 112.2(a)(1) are exempt from the requirements of the rule under § 1.1305(e) including asparagus; black beans; great Northern beans; kidney beans; lima beans; navy beans; pinto beans; garden beets (roots and tops); sugar beets; collards; sweet corn; eggplants; potatoes; pumpkins; winter squash; sweet potatoes; and water chestnuts.
Finfish (fresh, frozen, and previously frozen), specifically:		
Finfish, histamine-producing species	Includes all histamine-producing species of finfish. Examples include, but are not limited to, tuna, mahi mahi, mackerel, amberjack, jack, swordfish, and yellowtail.	
Finfish, species potentially contaminated with ciguatoxin	Includes all finfish species potentially contaminated with ciguatoxin. Examples include, but are not limited to, grouper, barracuda, and snapper.	
Finfish, species not associated with histamine or ciguatoxin	Includes all species of finfish not associated with histamine or ciguatoxin. Examples include, but are not limited to, cod, haddock, Alaska pollock, salmon, tilapia, and trout.	Siluriformes fish such as catfish.
Smoked finfish (refrigerated, frozen, and previously frozen)	Includes all types of smoked finfish, including cold and hot smoked finfish	
Crustaceans (fresh, frozen, and previously frozen)	Includes all crustacean species. Examples include but are not limited to shrimp, crab, lobster, and crayfish.	
Molluscan shellfish, bivalves (fresh, frozen, and previously frozen)	Includes all species of bivalve mollusks. Examples include, but are not limited to, oysters, clams, and mussels.	Does not include scallop adductor muscle. Raw bivalve molluscan shellfish that are (1) covered by the requirements of the National Shellfish Sanitation Program; (2) subject to the requirements of 21 CFR part 123, subpart C, and 21 CFR 1240.60; or (3) covered by a final equivalence determination by FDA for raw bivalve molluscan shellfish, are exempt from the requirements of the rule under § 1.1305(f).
Ready-to-eat deli salads (refrigerated)	Includes all types of refrigerated ready-to-eat deli salads, including ready-to-eat deli salads that are frozen at some point in the supply chain prior to retail. Examples include, but are not limited to, egg salad, potato salad, pasta salad, and seafood salad.	Does not include meat salads.

Code of Federal Regulations, § 133.150: Hard cheeses.

(a) The cheeses for which definitions and standards of identity are prescribed by this section are hard cheeses for which specifically applicable definitions and standards of identity are not prescribed by other sections of this part. They are made from milk and the other ingredients specified in this section, by the procedure set forth in [paragraph \(b\)](#) of this section. They contain not more than 39 percent of moisture, and their solids contain not less than 50 percent of milkfat, as determined by the methods prescribed in [§ 133.5\(a\)](#), [\(b\)](#), and [\(d\)](#). If the milk used is not pasteurized, the cheese so made is cured at a temperature of not less than 35 °F for not less than 60 days.

(b) Milk, which may be pasteurized or clarified or both, and which may be warmed, is subjected to the action of harmless lactic-acid-producing bacteria, with or without other harmless flavor-producing bacteria, present in such milk or added thereto. Harmless artificial coloring may be added. Sufficient rennet, rennet paste, extract of rennet paste, or other safe and suitable milk-clotting enzyme that produces equivalent curd formation, singly or in any combination (with or without purified calcium chloride in a quantity not more than 0.02 percent, calculated as anhydrous calcium chloride, of the weight of the milk) is added to set the milk to a semisolid mass. The mass is cut into small particles, stirred, and heated. The curd is separated from the whey, drained, and shaped into forms, and may be pressed. The curd is salted at some stage of the manufacturing process. The shaped curd may be cured. The rind may be coated with paraffin or rubbed with vegetable oil. A harmless preparation of enzymes of animal or plant origin capable of aiding in the curing or development of flavor of hard cheese may be added during the procedure, in such quantity that the weight of the solids of such preparation is not more than 0.1 percent of the weight of the milk used. Harmless flavor-producing microorganisms may be added, and curing may be conducted under suitable conditions for the development of biological curing agents.

(c) For the purposes of this section:

(1) The word “milk” means cow's milk or goat's milk or sheep's milk or mixtures of two or all of these. Such milk may be adjusted by separating part of the fat therefrom, or (in the case of cow's milk) by adding one or more of the following: Cream, skim milk, concentrated skim milk, nonfat dry milk; (in the case of goat's milk) the corresponding products from goat's milk; (in the case of sheep's milk) the corresponding products from sheep's milk; water in a quantity sufficient to reconstitute any concentrated or dried products used.

(2) Milk shall be deemed to have been pasteurized if it has been held at a temperature of not less than 143 °F for a period of not less than 30 minutes, or for a time and at a temperature equivalent thereto in phosphatase destruction. A hard cheese shall be deemed not to have been made from pasteurized milk if 0.25 gram shows a phenol equivalent of more than 3 micrograms when tested by the method prescribed in [§ 133.5\(c\)](#).

(d) Safe and suitable antimycotic agent(s), the cumulative levels of which shall not exceed current good manufacturing practice, may be added to the surface of the cheese.

(e) The name of each hard cheese for which a definition and standard of identity is prescribed by this section is “Hard cheese”, preceded or followed by:

(1) The specific common or unusual name of such hard cheese, if any such name has become generally recognized therefor; or

(2) If no such specific common or usual name has become generally recognized, therefor, an arbitrary or fanciful name that is not false or misleading in any particular.

(3) When milk other than cow's milk is used, in whole or in part, the statement “made from _____”, the blank being filled in with the name or names of the milk used, in order of predominance by weight.

(f) **Label declaration.** Each of the ingredients used in the food shall be declared on the label as required by the applicable sections of [parts 101](#) and [130 of this chapter](#), except that:

(1) When milk other than cow's milk is used, in whole or in part, the common or usual name of each such milk ingredient shall be declared in order of predominance by weight; and

(2) Enzymes of animal, plant, or microbial origin may be declared as “enzymes”.

Code of Federal Regulation § 112.2: What produce is not covered by this part?

(a) The following produce is not covered by this part:

(1) Produce that is rarely consumed raw, specifically the produce on the following exhaustive list: Asparagus; beans, black; beans, great Northern; beans, kidney; beans, lima; beans, navy; beans, pinto; beets, garden (roots and tops); beets, sugar; cashews; cherries, sour; chickpeas; cocoa beans; coffee beans; collards; corn, sweet; cranberries; dates; dill (seeds and weed); eggplants; figs; ginger; hazelnuts; horseradish; lentils; okra; peanuts; pecans; peppermint; potatoes; pumpkins; squash, winter; sweet potatoes; and water chestnuts.

Traceability Plan Example for Distribution Center (§ 1.1315)

The purpose of this document is to help businesses establish a traceability plan as required in § 1.1315 of the Food Traceability Rule.

This example includes the information that is required by the Food Traceability Rule and is one example of how a traceability plan can be established. There is no specific format required for the traceability plan, but the information in the traceability plan must meet the requirements as described in § 1.1315 of the Food Traceability Rule and reflect the current practices specific to the covered entity.

Requirements under § 1.1315 of the Food Traceability Rule:

If you are subject to the requirements of the rule, you must establish and maintain a traceability plan containing the following information:

1. A description of the procedures you use to maintain the records you are required to keep under this rule, 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, if applicable;
4. A statement identifying a point of contact for questions regarding your traceability plan and records; and
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.
 - Except for aquaculture farms, the farm map must show the location and name of each field (or other growing area) in which you grow a food on the Food Traceability List, including geographic coordinates and any other information needed to identify the location of each field or growing area.
 - For aquaculture farms, the farm map instead must show the location and name of each container (e.g., pond, pool, tank, cage) in which you raise seafood on the Food Traceability List, including geographic coordinates and any other information needed to identify the location of each container.
6. You must update your traceability plan as needed to ensure that the information provided reflects your current practices and to ensure that you are in compliance with the requirements of the Food Traceability Rule. You must retain your previous traceability plan for 2 years after you update the plan.

Traceability Plan	Page 1 of 1	
Business Name: Dee-Cee Distribution Center	ISSUE DATE	01/15/2028
Address: 123 Distributors Lane, College Park, MD 20737	SUPERSEDES	02/20/2026

Procedures to Maintain the Records

When shipments are inbound to Dee-Cee Distribution Center, shippers are required to transmit an ASN to the Dee-Cee EDI gateway or email the College Park logistics department email address with the inbound shipment details. When an inbound shipment includes foods on the FTL, this transmission or email needs to include the Shipping KDEs that the supplier is required to send, including the Traceability Lot Code of the foods.

Pending arrivals are created in Dee-Cee's Warehouse Management System (WMS) with the details of the expected shipment. Then, when the truck is unloaded at College Park, the unloading staff can record a *Warehouse Receipt* transaction in the WMS which records the KDEs required for a Receiving CTE. The *Warehouse Receipt* transaction can update which products, quantities, and Traceability Lot Codes are recorded in the WMS if what is actually unloaded differs from the ASN.

When outbound shipments are assembled by pickers, the products and their associated TLCs are recorded in a *Warehouse Pick* transaction in the WMS. After the doors are closed on the truck, the loading staff confirms the *Warehouse Pick* transaction which either triggers an ASN in the Dee-Cee EDI gateway (if the recipient is setup with EDI) or notification to the logistics department to email the shipping KDEs to the recipient.

The Dee-Cee EDI gateway and WMS are cloud-hosted software solutions that store records digitally such that the records are accessible by personnel at the College Park distribution center. When the logistics department receives documents via email for inbound shipments, the documents are saved as PDFs in the Dee-Cee document management system (DMS), where they are associated with the WMS Warehouse Receipt transaction #. If documents (e.g., Bills of Lading) are hand-delivered by a driver, the unloading staff will pass them along to the logistics department to scan the documents and store in the DMS. The DMS is also a cloud-hosted service that stores the files digitally in a way that is accessible by personnel at the College Park location.

Procedures to Identify FTL Foods

Many products packed at this operation are on the FTL. Because suppliers and current inventory needs change often, our Traceability Manager reviews all new products and compares them to the FDA's Food Traceability List before they are added to our Product Lists. When FTL foods are identified (including foods that contain FTL ingredients), they are flagged in our warehouse management system as FTL foods.

Assigning Traceability Lot Codes

Most FTL products received already have assigned Traceability Lot Codes. The only situation in which our firm assigns TLCs is when we receive FTL foods from exempt entities. In that situation, we assign a TLC that consists of the supplier's name/number in our WMS, the purchase order number, SKU, and the date of receipt of the food.

Point of Contact

Marie Clover, Inventory Control Specialist, 123-456-7899

Traceability Plan Updates

This plan is reviewed annually as part of our management review of our food safety system, as well as whenever something changes in our traceability procedures. Each previous traceability plan is maintained in our Document Management System at least two years after it is updated.