

OnTrak Webinar: Decoding FDA's New Food Traceability Rule

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Questions/Answers

Q: Can you explain a bit more of the lock code initiator? In short, what it is?

A: Basically, the proposed rule states that the earliest place there can be a lot assigned to the product in the supply chain; that lot number follow it through the entire supply chain as the lock code initiator.

Q: Does the new traceability rule apply to any beverages?

A: Technically, the proposed rule does not apply to beverages that fall under other regulations. However, if you have a raw beverage of some sort that includes one of the FTLs as ingredients (e.g., vegetable drink that includes leafy greens as an ingredient), it must be included.

Q: Would seed butter fall into the nut butter group?

A: Great question! The quick glance guide (see attachment) says seeds and soy butters are not included.

Q: Will FDA's new Traceability Rule also be CFIA compliant?

A: Since the rule is still in the proposed stage, I would hesitate to respond to that. TBD.

Q: Will there be any difference in the rollout of this rule for small businesses?

A: The proposed rule states that companies with 10 or fewer people might have a different rollout, but that is still being discussed and out for comment. Otherwise, it appears that the rollout is the same for the rest of the industry.

Q: Is the rule only concerned with food/ingredient or is packaging a part of it as well?

A: Currently, the proposed rule does not appear to include packaging on the FTL.

Q: Is there any language regarding standardizing lot codes from suppliers? Are internal lot codes at the production level appropriate if vendor codes are not compatible with internal systems, i.e., case labeling and ERP software restrictions?

A: The proposed rule mentions ways to create lot codes and discussed. With items on the FTL, it appears that the lot code that is assigned by the Lot Code Initiator must be shared throughout the supply chain, which means if there are internal lot codes assigned, they must somehow also have the original lot code included in paperwork shared forward.

Q: When discussing tropical tree fruits, does this include processed fruits like date paste and banana powder?

A: In the proposed rule, processing that has a kill step is where the FTL item stops. If there is no kill step applied, then there is no need to be a FTL traceability program.

Q: Will a manufacturing site with a kill step need to verify/validate that they are receiving KDE's from a vendor?

A: From what I have read, the kill steps are where the documentation will stop. However, it appears the shipper will be responsible for making sure that they send the KDE information with their paperwork.

Q: What could I do if the importer does not request any COA or COI from the actual ingredient supplier?

A: In my opinion, this will need to be sorted out between the entity that is selling the product to the buyer. I have seen these types of requirements written into business terms of contracts. However, larger companies may not always see eye to eye with the smaller companies, so that could affect the discussions.

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