



**Proposed Rule:
Requirements for Additional Traceability
Records for Certain Foods:
Supply Chain Example**

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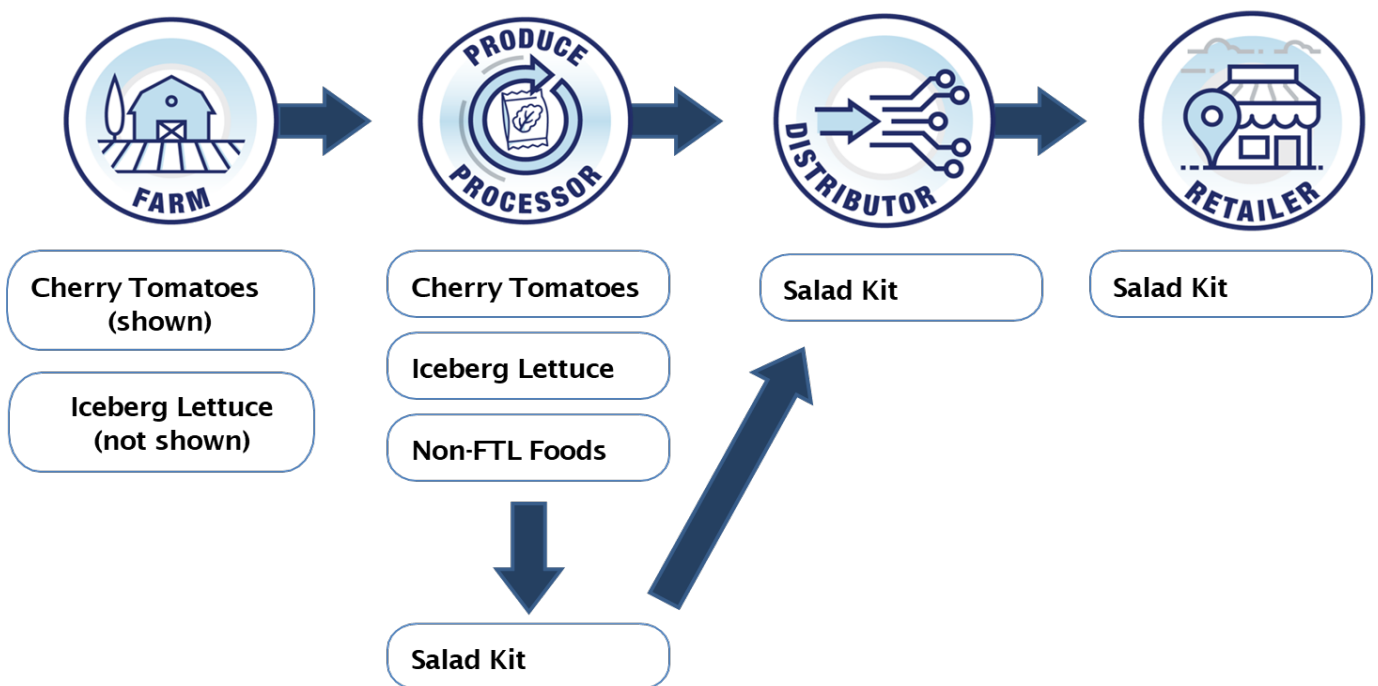
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I. Overview

This is a basic example of a salad kit prepared with cherry tomatoes, iceberg lettuce, and other foods that are not on the Food Traceability List (FTL), with a focus on the tomato grower, salad kit maker, distributor and retail store (**Diagram 1a**). This example was originally presented as a PowerPoint presentation during three public meetings that were held in late 2020 to discuss the proposed rule. The original presentation during the public meetings included abbreviated data due to time constraints.

As discussed at the public meeting, this is only one example and it does NOT represent the only way data can be kept and shared under the proposed rule. Furthermore, this is a hypothetical example in which the Food Traceability Proposed Rule has been finalized without changes. In reality, the proposed rule has not yet been finalized, and it is possible that the final rule will differ from the proposed rule.

Diagram 1.a: Example of a Salad Kit Supply Chain



The finished product is a salad kit made from cherry tomatoes, iceberg lettuce and non-FTL ingredients. The example focuses on the cherry tomatoes. Full information is therefore not provided about the iceberg lettuce, although some information about the iceberg lettuce is included under the First Receiver, Receiving, and Transformation Key Data Elements (KDEs) at the Produce Processor.

Diagram 1.b: Example of Required Records for Salad Kit Supply Chain

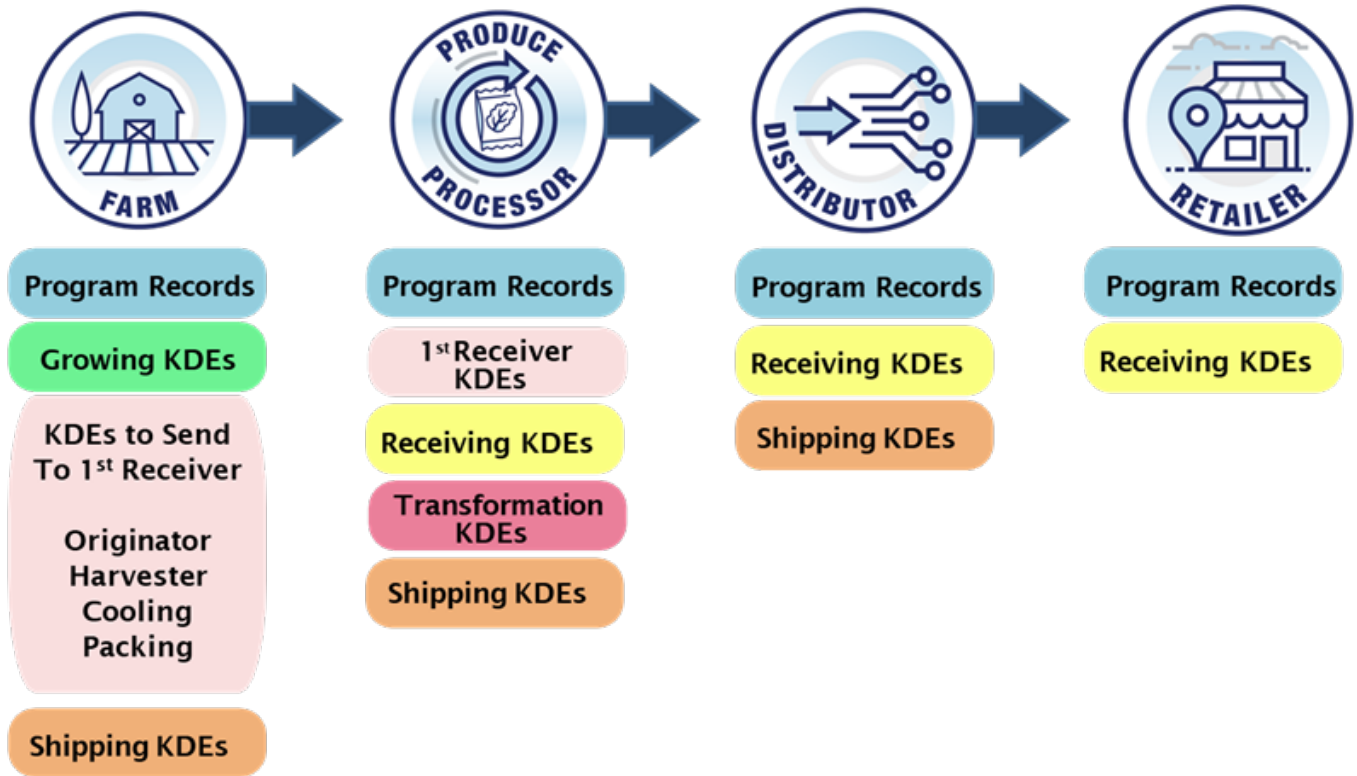


Diagram 1.b provides a quick snapshot of the records that the proposed rule would require -- including Traceability Program Records and records relating to critical tracking events (CTEs) -- for each supply chain participant.

Traceability program records and KDEs for the applicable CTEs were shown as abbreviated spreadsheets during the public meeting but are shown in full in this document. The records shown in this document are represented in a technology agnostic manner but were originally developed using a spreadsheet application.

II. Tomato Farm Traceability Records

II.a Tomato Farm Scenario Overview

- *Tom's Produce* (the “Farmer” in this scenario) is a large produce company that contracts with several companies to grow, harvest, pack and ship fresh produce, including cherry tomatoes.
- *Tom's Produce* retains ownership of the crop from planting until it is shipped to the processor, and **has agreed to keep and send records on behalf of the following entities:**
 - *Tom's Tomato Farm #1* – grows the cherry tomatoes; owned by Tom Jr.
 - *Harry's Harvesting* – harvests the cherry tomatoes
 - *Pattie's Packers* – cools and packs the cherry tomatoes
 - *Johnson's Storage* – stores and ships packed cherry tomatoes for *Tom's Produce*

II.b Farmer's Traceability Program Records, Description of Reference Records

[Proposed § 1.1315](#) would require persons subject to the rule to establish and maintain certain traceability program records. These are described in proposed § 1.1315(a)(1), (2), (3), and (4). Table 2.b shows how *Tom's Produce* chooses to maintain the information from proposed § 1.1315(a)(1), which is:

- 1) a description of the reference records in which the company maintains the information required under the rule;
- 2) an explanation of where on the records the required information appears, and
- 3) if applicable, a description of how reference records for different tracing events for a food (e.g., receipt, transformation, shipment) are linked.

The proposed rule includes the following discussion of proposed § 1.1315(a)(1): “We encourage firms to maintain required traceability information in a single electronic system; however, we recognize there are firms that currently do not have product tracing systems that enable them to do this. We therefore propose to require firms to describe the particular types of reference records in which they keep the required tracing information to help expedite the firm's production of records and facilitate FDA's review of those records during a foodborne illness outbreak investigation. In some recent foodborne illness outbreaks, firms' inability to quickly identify and make available to the FDA pertinent information on such matters as production, receipt, and shipment of a possibly contaminated food has significantly delayed completion of our investigation, resulting in greater harm to consumers. Furthermore, even when a firm produces the relevant records, additional delays can occur when it is difficult to find the relevant information on those records.” (See [85 FR 59984, 60004-05.](#))

Table 2.b Farm example, description of reference records ([Proposed § 1.1315\(a\)\(1\)](#))

Rule CTE	Reference Record	Rule KDE	Field Name on Record
Growing	Planting Record	Traceability lot code	Traceability Lot Code
Growing	Planting Record	Growing area coordinates	Growing Area Coordinates
Shipping	Bill of Lading	Reference record type and number	Bill of Lading number (BOL #)
Shipping	Bill of Lading	Import entry number	Not Applicable
Shipping	Bill of Lading	Transporter name	Carrier
Shipping	Bill of Lading	Traceability lot code	Lot
Shipping	Bill of Lading	Quantity and unit of measure	Qty, UOM
Shipping	Bill of Lading	Traceability product identifier	Product ID
Shipping	Bill of Lading	Traceability product description	Product Description
Shipping	Bill of Lading	Traceability lot code generator location identifier and description	Traceability Lot Code Generator
Shipping	Bill of Lading	Lot code generator point of contact	TLCG Point of Contact
Shipping	Bill of Lading	Immediate subsequent recipient location identifier and description	Ship To
Shipping	Bill of Lading	Location identifier and description from which the food was shipped	Ship From
Shipping	Bill of Lading	Date and time when food was shipped	Ship Date
Shipping	Bill of Lading	Statement if the shipper is a farm	Farm Statement
Shipping	Bill of Lading	Originator location identifier and description	Originator
Shipping	Bill of Lading	Harvester business name, point of contact, and phone number	Harvester

Rule CTE	Reference Record	Rule KDE	Field Name on Record
Shipping	Bill of Lading	Date and time of harvest	Harvest Date
Shipping	Bill of Lading	Cooling location identifier and description	Cooler ID Cooler Description
Shipping	Bill of Lading	Cooling date & time	Cooling Date
Shipping	Bill of Lading	Packing location identifier and description	Packer ID Packer Description
Shipping	Bill of Lading	Packing date & time	Packing Date
Receiving	Bill of Lading	Reference record type and number	Bill of Lading Number (BOL #)
Receiving	Bill of Lading	Import entry number	Not Applicable
Receiving	Bill of Lading	Transporter name	Carrier
Receiving	Bill of Lading	Traceability lot code	Lot
Receiving	Bill of Lading	Quantity and unit of measure	Qty, UOM
Receiving	Bill of Lading	Traceability product identifier	Product ID
Receiving	Bill of Lading	Traceability product description	Product Description
Receiving	Bill of Lading	Lot code generator location identifier and description	Traceability Lot Code Generator
Receiving	Bill of Lading	Lot code generator point of contact	TLCG Point of Contact
Receiving	Bill of Lading	Location identifier and description for where food was received	Ship To
Receiving	Bill of Lading	Location identifier and description for the immediate previous source	Ship From
Receiving	Bill of Lading	Date and time for when food was received	Receive Date

II.c Farmer’s Traceability Program Records, Listing of FTL Foods Shipped

[Proposed § 1.1315\(a\)\(2\)](#) would require persons subject to subpart S to establish and maintain a list of foods on the Food Traceability List that they ship, including the “traceability product identifier” and “traceability product description” for each food. [Proposed § 1.1310](#) would define those two terms as follows:

- “Traceability product identifier means a unique identification code (such as an alphanumeric code) that an entity assigns to designate a specific type of food product.”
- “Traceability product description means a description of a food product typically used commercially for purchasing, stocking, or selling, and includes the category code or term, category name, and trade description. For single-ingredient products, the trade description includes the brand name, commodity, variety, packaging size, and packaging style. For multiple-ingredient food products, the trade description includes the brand name, product name, packaging size, and packaging style.”

Table 2.c Farm example, listing of FTL foods shipped ([Proposed § 1.1315\(a\)\(2\)](#))

Traceability Product Identifier	Category Code or Term	Category Name	Brand Name	Commodity	Variety	Product Name	Packaging Size	Packaging Style
614141007331	100061621	Cherry Tomatoes--Round	Tom's Produce	Tomatoes	Cherry	n/a	Bulk	Field Bin
614141007349	100061621	Cherry Tomatoes--Round	Tom's Produce	Tomatoes	Cherry	n/a	10 LB	Carton
614141007350	100061621	Cherry Tomatoes--Round	Tom's Produce	Tomatoes	Cherry	n/a	20 LB	Carton

II.d Farmer’s Traceability Program Records, Traceability Lot Code Assignment Method

[Proposed § 1.1315\(a\)\(3\)](#) would require persons subject to subpart S to establish and maintain a description of how they establish and assign traceability lot codes to foods on the Food Traceability List that they originate, transform, or create, if applicable. As explained in the proposed rule, “Because of the significance of lot codes in food tracing, understanding how a firm creates and assigns traceability lot codes would provide [FDA] with information about the relevance of a code to a particular outbreak investigation and insight on how the code can help [FDA] appropriately narrow or broaden the investigation.” (See [85 FR 59984, 60006](#).)

Table 2.d Farm example, traceability lot code assignment method ([Proposed § 1.1315\(a\)\(3\)](#))

Traceability Lot Code Assignment Method	Traceability Lot Code Format	Example
Lot codes are assigned based on the commodity, variety, location and harvest date.	COM-VAR-LOC-DDMMYY	<p>TOM-CHE-TTF1-091620 = Tomato - Cherry - Tom's Tomato Farm #1 - Sep 16, 2020</p>

II.e Farmer’s Traceability Program Records, Other Information, Location Master Listing

[Proposed § 1.1315\(a\)\(4\)](#) would require persons subject to subpart S to establish and maintain records containing any other information needed to understand the data provided within any required subpart S records, such as internal or external coding systems, glossaries, and abbreviations. As described in the proposed rule, “[FDA] need[s] this information to be able to adequately understand the terminology, methods, and systems a firm uses in its traceability operations.” (See [85 FR 59984, 60006](#).)

In this example, *Tom’s Produce* has opted to maintain a location master list that links each location identifier that is used in their recordkeeping to the corresponding location description, as shown in **Table 2.e**.

Table 2.e Farm example, other information, location master list ([Proposed § 1.1315\(a\)\(4\)](#))

Location Identifier	Business Name	Physical Location Name	Primary Phone	Street Address or Geographical Coordinates	City	State	ZIP Code
TP	Tom's Produce	Tom's Produce HQ	111.111.1111	100 Birch	Tomato City	FL	99999
TTF1	Tom's Produce	Tom's Tomato Farm #1	444.444.4444	26.422831, - 81.420123	Tomato City	FL	99999
PP-PS	Patties' Packers	PP Packing Shed	666.666.6666	260 Birch	Tomato City	FL	99999
JS-W4	Johnson's Storage	JS Warehouse #4	777.777.7777	270 Birch	Tomato City	FL	99999
FP-PL-16	Fresh Processor	Plant #16	818.818.8181	60 Elm St	Everytown	SC	99999

II.f Farmer’s Growing KDEs (kept)

[Proposed § 1.1325](#) would require persons who grow a listed food to establish and maintain records containing and linking the traceability lot code of the food to the growing area coordinates for that lot. The proposed rule explains: “To meet this requirement to record growing area coordinates, farms typically would maintain the GPS coordinates for the entrance of the specific field or ranch where the food was grown.” (See [85 FR 59984, 60007](#).)

In this example, *Tom’s Produce* maintains this information in **Table 2.f**.

Table 2.f Farm example, growing KDEs ([Proposed § 1.1325\(a\)](#))

Traceability Lot Code	Growing Area Coordinates
TOM-CHE-TTF1-091620	26.422831, -81.420123
TOM-CHE-TTF1-091820	26.422831, -81.420123
TOM-CHE-TTF1-091920	26.423421, -81.423456

II.g Farmer’s Receiving KDEs (kept)

[Proposed § 1.1335](#) would require persons subject to subpart S to establish and maintain records containing KDEs related to the receiving of listed foods.

For this example, Tom’s Produce maintains the records for Tom’s Tomato Farm, Harry’s Harvesting, Pattie’s Packers and Johnson’s Storage. Therefore, Tom’s Produce has agreed to keep the KDEs for the receiving of product at Pattie’s Packers Packing Shed (PP-PS) from Tom’s Tomato Farm #1 (TTF1) and at Johnson’s Storage Warehouse #4 (JS-W4) from Pattie’s Packers Packing Shed (PP-PS) – shown in **Table 2.g**.

As in prior examples, **Table 2.g** does not include certain product description and location description information, because *Tom’s Produce* chooses to utilize master files to link such information to the relevant traceability product identifiers and location identifiers, respectively.

Table 2.g Processor example, receiving KDEs ([Proposed § 1.1335](#))

Reference Record Type and Number (keep)	Transporter Name (keep)	Import Entry Number (keep)	Traceability Lot Code (keep)	Quantity and Unit of Measure (keep)	Traceability Product Identifier (keep)	Traceability Lot Code Generator Location Identifier (keep)	Traceability Lot Code Generator Point of Contact Name (keep)	Traceability Lot Code Generator Point of Contact Phone (keep)	Traceability Lot Code Generator Point of Contact Email* (keep)	Location Identifier for where food was received (keep)	Location Identifier for the immediate previous source (keep)	Receipt Date and Time (keep)
BOL 24884	Local Trucking Co.	N/A	TOM-CHE-TTF1-091620	100 Field Bins	614141007331	TP	Tom Orange	444-444-4445	tlcg@tp.com	PP-PS	TTF1	9/16/20 11:00 AM
BOL 23949	Florida Trucking Co.	N/A	TOM-CHE-TTF1-091620	200 Cases	614141007349	TP	Tom Orange	444-444-4445	tlcg@tp.com	JS-W4	PP-PS	9/16/20 6:00 PM
BOL 24885	Local Trucking Co.	N/A	TOM-CHE-TTF1-091820	110 Field Bins	614141007331	TP	Tom Orange	444-444-4445	tlcg@tp.com	PP-PS	TTF1	9/18/20 12:00 PM
BOL 23950	Florida Trucking Co.	N/A	TOM-CHE-TTF1-091820	205 Cases	614141007349	TP	Tom Orange	444-444-4445	tlcg@tp.com	JS-W4	PP-PS	9/18/20 7:00 PM
BOL 24886	Local Trucking Co.	N/A	TOM-CHE-TTF1-091920	90 Field Bins	614141007331	TP	Tom Orange	444-444-4445	tlcg@tp.com	PP-PS	TTF1	9/19/20 10:00 AM
BOL 23951	Florida Trucking Co.	N/A	TOM-CHE-TTF1-091920	190 Cases	614141007349	TP	Tom Orange	444-444-4445	tlcg@tp.com	JS-W4	PP-PS	9/19/20 5:00 PM

* [Proposed § 1.1310](#) defines “point of contact” to mean “an individual having familiarity with an entity's procedures for traceability, including their name, telephone number, and, if available, their email address and fax number.” In this example there is an email available (shown in table), but there is no fax number available.

II.h Farmer's Shipping KDEs (kept and sent)

[Proposed § 1.1350\(a\)](#) would require persons subject to subpart S to establish and maintain records containing specific KDEs related to the shipping of listed foods. In addition, proposed § 1.1350(b)(1) would require that some (but not all) of the KDEs identified in proposed § 1.1350(a) be sent to the immediate subsequent recipient of the food, either in electronic or written form.

As discussed above, *Tom's Produce* captures the Shipping KDEs between Tom's Tomato Farm #1 (TTF1) and Pattie's Packers Packing Shed (PP-PS), and between Pattie's Packers Packing Shed and Johnson's Storage Warehouse #4 (JS-W4). *Tom's Produce* also keeps and sends the Shipping KDEs between Johnson's Storage (JS-W4) and the immediate subsequent recipient (in this example, the firm *Fresh Processor* Plant #16, FP-PL-16).

Tom's Produce maintains this information in **Table 2.h**. Each column title in **Table 2.h** indicates whether the data is kept and sent, or simply kept.

Table 2.h does not include the traceability product description, the lot code generator's location description, the immediate subsequent recipient's location description, or the location description for the location from which the food was (all of which are KDEs that would be required to be both kept and sent under proposed § 1.1350). This is because *Tom's Produce* chooses to instead provide relevant entries from the Listing of FTL Foods Shipped (**Table 2.c**) and the Location Master List (**Table 2.e**), which link the traceability product identifiers and the various location identifiers used in **Table 2.h** to the relevant traceability product descriptions and location descriptions, respectively.

Table 2.h Farm example, shipping KDEs ([Proposed § 1.1350\(a\)](#))

Reference Record Type and Number (keep)	Transporter Name (keep)	Import Entry Number (keep & send)	Traceability Lot Code (keep & send)	Quantity and Unit of Measure (keep & send)	Traceability Product Identifier (keep & send)	Traceability Lot Code Generator Location Identifier (keep & send)	Traceability Lot Code Generator Point of Contact Name (keep & send)	Traceability Lot Code Generator Point of Contact Phone (keep & send)	Traceability Lot Code Generator Point of Contact Email* (keep & send)	Location Identifier for immediate subsequent recipient (keep & send)	Location Identifier from which the food was shipped (keep & send)	Shipment Date and Time (keep & send)
BOL 24884	Local Trucking Co.	N/A	TOM-CHE-TTF1-091620	100 Field Bins	614141007331	TP	Tom Orange	444-444-4445	tlcg@tp.com	PP-PS	TTF1	9/16/20 10:00 AM
BOL 23949	Florida Trucking Co.	N/A	TOM-CHE-TTF1-091620	200 Cases	614141007349	TP	Tom Orange	444-444-4445	tlcg@tp.com	JS-W4	PP-PS	9/16/20 5:00 PM
BOL 456789	ABC Shipping Co.	N/A	TOM-CHE-TTF1-091620	150 Cases	614141007349	TP	Tom Orange	444-444-4445	tlcg@tp.com	FP-PL-16	JS-W4	9/17/20 6:00 AM
BOL 24885	Local Trucking Co.	N/A	TOM-CHE-TTF1-091820	110 Field Bins	614141007331	TP	Tom Orange	444-444-4445	tlcg@tp.com	PP-PS	TTF1	9/18/20 11:00 AM
BOL 23950	Florida Trucking Co.	N/A	TOM-CHE-TTF1-091820	205 Cases	614141007349	TP	Tom Orange	444-444-4445	tlcg@tp.com	JS-W4	PP-PS	9/18/20 6:00 PM
BOL 456790	ABC Shipping Co.	N/A	TOM-CHE-TTF1-091820	155 Cases	614141007349	TP	Tom Orange	444-444-4445	tlcg@tp.com	FP-PL-16	JS-W4	9/19/20 5:00 AM
BOL 24886	Local Trucking Co.	N/A	TOM-CHE-TTF1-091920	90 Field Bins	614141007331	TP	Tom Orange	444-444-4445	tlcg@tp.com	PP-PS	TTF1	9/19/20 9:00 AM
BOL 23951	Florida Trucking Co.	N/A	TOM-CHE-TTF1-091920	190 Cases	614141007349	TP	Tom Orange	444-444-4445	tlcg@tp.com	JS-W4	PP-PS	9/19/20 4:00 PM
BOL 456791	ABC Shipping Co.	N/A	TOM-CHE-TTF1-091920	140 Cases	614141007349	TP	Tom Orange	444-444-4445	tlcg@tp.com	FP-PL-16	JS-W4	9/20/20 7:00 AM

* [Proposed § 1.1310](#) defines “point of contact” to mean “an individual having familiarity with an entity's procedures for traceability, including their name, telephone number, and, if available, their email address and fax number.” In this example there is an email available (shown in table), but there is no fax number available.

II.i Farmer’s Send-Only KDEs (sent)

As discussed above, [proposed § 1.1350\(b\)\(1\)](#) would require certain KDEs about shipping to be both maintained by the entity that shipped the product, and also sent to the immediate subsequent recipient of the food. In addition to this provision, proposed § 1.1350(b)(2) would require farms to send additional information to the immediate subsequent recipient.

Tom’s Produce maintains these farm-specific shipping KDEs in **Table 2.i**.

Similar to the situation described above regarding **Table 2.h**, **Table 2.i** does not include certain location description information, because *Tom’s Produce* chooses to utilize a Location Master List that links location identifiers to location descriptions.

As explained in the proposed rule: “We are proposing the additional information disclosure requirements for shippers who are farms because we propose to require that the first receiver of a food on the Food Traceability List (i.e., the first person other than a farm who purchases and takes physical possession of the food) maintain this information, and we understand that not all farms routinely provide this information to firms that buy food from the farms. Therefore, we believe it is appropriate to require farms to provide information on the origination (if not by the farm), harvesting, cooling, and packing of the food (if applicable) when they ship the food.

“In situations where food is sold from one farm to a second farm before being sold to a first receiver, this system would allow for all of the necessary information to reach the first receiver, even if some of the activities (e.g., origination and harvesting) took place on the first farm, while others (e.g., cooling and packing) took place on the second farm. In that situation, the first farm would be obligated under proposed § 1.1350(b)(1) to send information about their location to the second farm, and they would be obligated under proposed § 1.1350(b)(3)(iii) to send the second farm information about the date and time of harvesting. This would allow the second farm to fulfill its obligation under proposed § 1.1350(b)(2)(ii) and (iii) to send the first receiver information about the originator of the food and the date and time of harvesting. Moreover, the statement that the sender is a farm would allow the first receiver to recognize its status as a first receiver of a listed food, which might not otherwise be clear in this situation, where the second farm did not originate the food but nonetheless is a farm as defined in proposed § 1.1310.” ([See 85 FR 59984, 60012.](#))

Table 2.i Farm example, Send-Only KDEs ([Proposed § 1.1350\(b\)\(2\)](#))

Traceability Lot Code (send)	Statement if the shipper is a farm (send)	Originator Location Identifier (send)	Harvester Business Name (send)	Harvester Point of Contact (send)	Harvester Phone Number (send)	Harvest Date & Time (send)	Cooling Location Identifier (send)	Cooling Date & Time (send)	Packing Location Identifier (send)	Packing Date & Time (send)
TOM-CHE-TTF1-091620	Shipper is a farm	TTF1	Harry’s Harvesting	Harry Houdini	555.555.5555	9/16/20 9:00 AM	PP-PS	9/16/20 1:00 PM	PP-PS	9/16/20 3:00 PM
TOM-CHE-TTF1-091820	Shipper is a farm	TTF1	Harry’s Harvesting	Harry Houdini	555.555.5555	9/18/20 10:00 AM	PP-PS	9/18/20 2:00 PM	PP-PS	9/18/20 4:00 PM
TOM-CHE-TTF1-091920	Shipper is a farm	TTF1	Harry’s Harvesting	Harry Houdini	555.555.5555	9/19/20 8:00 AM	PP-PS	9/19/20 12:00 PM	PP-PS	9/19/20 2:00 PM

III. Processor's Traceability Records

III.a Fresh Processor Scenario Overview

- The next point in this example supply chain is *Fresh Processor*. *Fresh Processor* receives ingredients and processes them to create salad kits made from cherry tomatoes, iceberg lettuce and non-FTL ingredients.
- The companies *Fresh Processor* works with are:
 - *Tom's Produce* – cherry tomato source
 - *Lizzie's Lettuce* – iceberg lettuce grower
 - *Food Distributors* – receives salad kits from *Fresh Processor* and distributes salad kits to *Retailer*

III.b Processor’s Traceability Program Records, Description of Reference Records

[Proposed § 1.1315\(a\)\(1\)](#) would require persons subject to subpart S to establish and maintain a description of the reference records in which they maintain the information required under subpart S, an explanation of where on the records the required information appears, and, if applicable, a description of how reference records for different tracing events for a food (e.g., receipt, transformation, shipment) are linked.

Fresh Processor maintains this information in **Table 3.b**.

Table 3.b Processor example, description of reference records ([Proposed § 1.1315\(a\)\(1\)](#))

Rule CTE	Reference Record	Rule KDE	Field Name on Record
Receiving	Bill of Lading (paper)	Reference record type and number	Bill of Lading Number (BOL #)
Receiving	Bill of Lading (paper)	Import entry number	N/A
Receiving	Bill of Lading (paper)	Transporter name	Carrier
Receiving	Bill of Lading (paper)	Traceability lot code	Lot
Receiving	Bill of Lading (paper)	Quantity and unit of measure	Qty, UOM
Receiving	Bill of Lading (paper)	Traceability product identifier	Product ID
Receiving	Bill of Lading (paper)	Traceability product description	Product Description
Receiving	Bill of Lading (paper)	Traceability lot code generator location identifier and description	Traceability Lot Code Generator
Receiving	Bill of Lading (paper)	Traceability lot code generator point of contact	TLCG POC Name, Phone, Email
Receiving	Bill of Lading (paper)	Immediate previous source location identifier and description	Ship To
Receiving	Bill of Lading (paper)	Location identifier and description of where the food was received	Ship From
Receiving	Bill of Lading (paper)	Date and time when food was received	Ship Date

Table 3.b Processor example, description of reference records ([Proposed § 1.1315\(a\)\(1\)](#)) continued

Rule CTE	Reference Record	Rule KDE	Field Name on Record
Receiving (First Receiver)	Bill of Lading (paper)	Originator location identifier and description	Originator
Receiving (First Receiver)	Bill of Lading (paper)	Harvester business name, point of contact, and phone number	Harvester
Receiving (First Receiver)	Bill of Lading (paper)	Date and time of harvest	Harvest Date
Receiving (First Receiver)	Bill of Lading (paper)	Cooling location identifier and description	Cooler ID Cooler Description
Receiving (First Receiver)	Bill of Lading (paper)	Cooling date & time	Cooling Date
Receiving (First Receiver)	Bill of Lading (paper)	Packing location identifier and description	Packer ID Packer Description
Receiving (First Receiver)	Bill of Lading (paper)	Packing date & time	Packing Date

Table 3.b Processor example, description of reference records ([Proposed § 1.1315\(a\)\(1\)](#)) continued

Rule CTE	Reference Record	Rule KDE	Field Name on Record
Transformation	Work Order (paper & electronic)	Traceability lot code of food used in transformation	Ingredient Lot
Transformation	Work Order (paper & electronic)	Quantity of traceability lot of food used in transformation	Qty
Transformation	Work Order (paper & electronic)	Traceability product identifier of food used in transformation	Ingredient ID
Transformation	Work Order (paper & electronic)	Traceability product description of food used in transformation	Ingredient Description
Transformation	Work Order (paper & electronic)	New traceability lot code of food produced through transformation	Finished Lot
Transformation	Work Order (paper & electronic)	Location identifier of where food transformed	Processing Location
Transformation	Work Order (paper & electronic)	Location description of where food transformed	Processing Location
Transformation	Work Order (paper & electronic)	Date transformation complete	WO Date
Transformation	Work Order (paper & electronic)	Quantity and unit of measure of each new traceability lot of food produced through transformation	Qty / UOM
Transformation	Work Order (paper & electronic)	Traceability product identifier of food produced through transformation	Finished Product ID
Transformation	Work Order (paper & electronic)	Traceability product description of food produced through transformation	Finished Product Description
Transformation	Work Order (paper & electronic)	Reference record type and number	Work Order Number

Table 3.b Processor example, description of reference records ([Proposed § 1.1315\(a\)\(1\)](#)) continued

Rule CTE	Reference Record	Rule KDE	Field Name on Record
Shipping	Advanced Shipment Notice (electronic)	Reference record type and number	asn_number
Shipping	Advanced Shipment Notice (electronic)	Import entry number	N/A
Shipping	Advanced Shipment Notice (electronic)	Transporter name	transporter_name
Shipping	Advanced Shipment Notice (electronic)	Traceability lot code	lot
Shipping	Advanced Shipment Notice (electronic)	Quantity and unit of measure	quantity, unit_of_measure
Shipping	Advanced Shipment Notice (electronic)	Traceability product identifier	traceability_product_id
Shipping	Advanced Shipment Notice (electronic)	Traceability product description	product_description
Shipping	Advanced Shipment Notice (electronic)	Traceability lot code generator location identifier and description	traceability_lot_code_generator
Shipping	Advanced Shipment Notice (electronic)	Traceability lot code generator point of contact	tlcg_point_of_contact_name tlcg_point_of_contact_phone tlcg_point_of_contact_email
Shipping	Advanced Shipment Notice (electronic)	Immediate subsequent recipient location identifier and description	ship_to_location_id
Shipping	Advanced Shipment Notice (electronic)	Location identifier and description from which the food was shipped	ship_from_location_id
Shipping	Advanced Shipment Notice (electronic)	Date and time when food was shipped	ship_date

III.c Processor’s Traceability Program Records, Listing of FTL Foods Shipped

[Proposed § 1.1315\(a\)\(2\)](#) would require persons subject to subpart S to establish and maintain a list of foods on the Food Traceability List that they ship, including the traceability product identifier and traceability product description for each food.

In this example, *Fresh Processor* maintains a list of the salad kits that they produce and ship in **Table 3.c**.

Table 3.c Processor example, listing of FTL foods shipped ([Proposed § 1.1315\(a\)\(2\)](#))

Traceability Product Identifier	Category Code or Term	Category Name	Brand Name	Commodity	Variety	Product Name	Packaging Size	Packaging Style
999999	FV-FC	Fruits and Vegetables (fresh-cut)	Fresh Processor	n/a	n/a	Garden Salad Kit 10 X 12 OZ (UPC: 99999999)	8 LB	Carton

III.d Processor’s Traceability Program Records, Traceability Lot Code Assignment Method

[Proposed § 1.1315\(a\)\(3\)](#) would require persons subject to subpart S to establish and maintain a description of how they establish and assign traceability lot codes to foods on the Food Traceability List that they originate, transform, or create, if applicable.

Table 3.d explains how *Fresh Processor* establishes and assigns traceability lot codes.

Table 3.d Processor example, traceability lot code assignment method ([Proposed § 1.1315\(a\)\(3\)](#))

Traceability Lot Code Assignment Method	Traceability Lot Code Format	Example
Lot codes are assigned based on the location and process date.	LOC-DDMMYY	FPP16-091920 = Fresh Processor Plant #16, September 19, 2020

III.e Processor’s Traceability Program Records, Other Information, Location Master Listing

As described above, [proposed § 1.1315\(a\)\(4\)](#) would require persons subject to subpart S to establish and maintain records containing any other information needed to understand the data provided within any required subpart S records, such as internal or external coding systems, glossaries, and abbreviations.

In this example, *Fresh Processor* has opted to maintain a location master list that links each location identifier that is used in their recordkeeping to the corresponding location description, as shown in **Table 3.e**.

Table 3.e Processor example, other information, location master list ([Proposed § 1.1315\(a\)\(4\)](#))

Location Identifier	Business Name	Physical Location Name	Primary Phone	Street Address or Geographical Coordinates	City	State	ZIP Code
LL	Lizzie's Lettuce	Lizzie's Lettuce HQ	222.222.2222	100 Oak St	Salinas	CA	88888
LL-PW	Lizzie's Lettuce	Lizzie's Lettuce Produce Warehouse	222.222.2222	101 Oak St	Salinas	CA	88888
TP	Tom's Produce	Tom's Produce HQ	111.111.1111	100 Birch	Tomato City	FL	99999
JS-W4	Johnson's Storage	JS Warehouse #4	777.777.7777	270 Birch	Tomato City	FL	99999
TTF1	Tom's Produce	Tom's Tomato Farm #1	444.444.4444	26.422831, -81.420123	Tomato City	FL	99999
PP-PS	Patties' Packers	PP Packing Shed	666.666.6666	260 Birch	Tomato City	FL	99999
FP-PL-16	Fresh Processor	Plant #16	818.818.8181	60 Elm St	Everytown	SC	99999
DC-100	Food Distributors	DC #100	999.999.9999	100 Main St	Anytown	GA	99999

III.f Processor’s Traceability Program Records, Other Information, Listing of FTL Foods Received

[Proposed § 1.1315\(a\)\(4\)](#) would require persons subject to subpart S to establish and maintain records containing any other information needed to understand the data provided within any required subpart S records, such as internal or external coding systems, glossaries, and abbreviations.

In this example, *Fresh Processor* has opted to maintain a master list of FTL foods received that links the traceability product identifiers for those foods with the corresponding traceability product descriptions. This is shown in **Table 3.f**.

Table 3.f Processor example, other information, master list of FTL foods received ([Proposed § 1.1315\(a\)\(4\)](#))

Traceability Product Identifier	Category Code or Term	Category Name	Brand Name	Commodity	Variety	Product Name	Packaging Size	Packaging Style
61414100734 9	100061621	Cherry Tomatoes-- Round	Tom's Produce	Tomatoes	Cherry	n/a	10 LB	Carton
34810322385 2	10006079	Head/Iceberg Lettuce	Lizzie's Lettuce	Lettuce	Iceberg	n/a	15 LB	Carton

III.g Processor’s First Receiver KDEs (kept)

[Proposed § 1.1310](#) defines “first receiver” as the first person (other than a farm) who purchases and takes physical possession of a food on the Food Traceability List that has been grown, raised, caught, or (in the case of a non-produce commodity) harvested. As explained in the proposed rule, “A first receiver of a food might be a manufacturer/processor, distributor, or other non-farm entity who receives a food that has been originated.” (See [85 FR 59984, 60000](#).) The proposed rule further explained, “Given the wide variety of business models used in the farming community, we believe it will be most efficient to have the first non-farm entity that has purchased and taken physical possession of a listed food—i.e., the first receiver—maintain the tracing information provided by the farm(s) that originated and handled the product.” (See [85 FR 59984, 60008](#).)

[Proposed § 1.1330](#) would require that, in addition to the records of receipt of foods that would be required under proposed § 1.1335, “first receivers” would also need to establish and maintain certain additional records.

Table 3.g shows the First Receiver KDEs kept by *Fresh Processor* regarding the cherry tomatoes that they receive from *Tom’s Produce* and the iceberg lettuce that they receive from Lizzie’s Lettuce. As in prior examples, **Table 3g** does not include certain location description information, because *Fresh Produce* chooses to utilize a master file to link such information to the relevant location identifiers.

Table 3.g Processor example, first receiver KDEs ([Proposed § 1.1330](#))

Traceability Lot Code (keep)	Originator Location Identifier (keep)	Harvester Business Name (keep)	Harvester Point of Contact (keep)	Harvester Phone Number (keep)	Harvest Date & Time (keep)	Cooling Location Identifier (keep)	Cooling Date & Time (keep)	Packing Location Identifier (keep)	Packing Date & Time (keep)
TOM-CHE-TTF1-091620	TTF1	Harry's Harvesting	Harry Houdini	555.555.5555	9/16/20 9:00 AM	PP-PS	9/16/20 1:00 PM	PP-PS	9/16/20 3:00 PM
TOM-CHE-TTF1-091820	TTF1	Harry's Harvesting	Harry Houdini	555.555.5555	9/18/20 10:00 AM	PP-PS	9/18/20 2:00 PM	PP-PS	9/18/20 4:00 PM
TOM-CHE-TTF1-091920	TTF1	Harry's Harvesting	Harry Houdini	555.555.5555	9/19/20 8:00 AM	PP-PS	9/19/20 12:00 PM	PP-PS	9/19/20 2:00 PM
ZZZ-091420	LL-PW	Lizzie’s Lettuce	Chris Smith	123-111-3333	9/14/20 9:00 AM	LL-PW	9/14/20 11:00 AM	LL-PW	9/14/20 9:00 AM
ZZZ-091620	LL-PW	Lizzie’s Lettuce	Chris Smith	123-111-3333	9/16/20 10:00 AM	LL-PW	9/16/20 12:00 PM	LL-PW	9/16/20 10:00 AM
ZZZ-091720	LL-PW	Lizzie’s Lettuce	Chris Smith	123-111-3333	9/17/20 11:00 AM	LL-PW	9/17/20 1:00 PM	LL-PW	9/17/20 11:00 AM

III.h Processor’s Receiving KDEs (kept)

[Proposed § 1.1335](#) would require persons subject to subpart S to establish and maintain records containing KDEs related to the receiving of listed foods.

Fresh Processor maintains this information in **Table 3.h**.

As in prior examples, **Table 3.h** does not include certain product description and location description information, because *Fresh Processor* chooses to utilize master files to link such information to the relevant traceability product identifiers and location identifiers, respectively.

Table 3.h Processor example, receiving KDEs ([Proposed § 1.1335](#))

Reference Record Type and Number (keep)	Transporter Name (keep)	Import Entry Number (keep)	Traceability Lot Code (keep)	Quantity and Unit of Measure (keep)	Traceability Product Identifier (keep)	Traceability Lot Code Generator Location Identifier (keep)	Traceability Lot Code Generator Point of Contact Name (keep)	Traceability Lot Code Generator Point of Contact Phone (keep)	Traceability Lot Code Generator Point of Contact Email* (keep)	Location Identifier for where food was received (keep)	Location Identifier for the immediate previous source (keep)	Receipt Date and Time (keep)
BOL 456789	ABC Shipping Co.	N/A	TOM-CHE-TTF1-091620	150 Cases	614141007349	TP	Tom Orange	444-444-4445	tlcg@tp.com	FP-PL-16	JS-W4	9/17/20 5:00 PM
BOL 32748	DEF Shipping Co.	N/A	ZZZ-091420	300 Cases	348103223852	LL	Chris Smith	123-123-1212	csmith@gmail.com	FP-PL-16	LL-PW	9/17/20 6:00 PM
BOL 456790	ABC Shipping Co.	N/A	TOM-CHE-TTF1-091820	155 Cases	614141007349	TP	Tom Orange	444-444-4445	tlcg@tp.com	FP-PL-16	JS-W4	9/19/20 3:00 PM
BOL 32749	DEF Shipping Co.	N/A	ZZZ-091620	280 Cases	348103223852	LL	Chris Smith	123-123-1212	csmith@gmail.com	FP-PL-16	LL-PW	9/19/20 4:00 PM
BOL 456791	ABC Shipping Co.	N/A	TOM-CHE-TTF1-091920	140 Cases	614141007349	TP	Tom Orange	444-444-4445	tlcg@tp.com	FP-PL-16	JS-W4	9/20/20 7:00 PM
BOL 32750	DEF Shipping Co.	N/A	ZZZ-091720	320 Cases	348103223852	LL	Chris Smith	123-123-1212	csmith@gmail.com	FP-PL-16	LL-PW	9/20/20 8:00 PM

* [Proposed § 1.1310](#) defines “point of contact” to mean “an individual having familiarity with an entity's procedures for traceability, including their name, telephone number, and, if available, their email address and fax number.” In this example there is an email available (shown in table), but there is no fax number available.

III.i Processor’s Transformation KDEs (kept)

[Proposed § 1.1340](#) would require, for each new traceability lot of food produced through transformation, that the person who transforms the food establish and maintain records containing and linking the new traceability lot code of the food produced through transformation to certain information regarding: (1) the food(s) on the Food Traceability List used in transformation and (2) the food produced through transformation.

[Proposed § 1.1310](#) would define “transformation” as an event in a food's supply chain that involves changing a food on the Food Traceability List, its package, and/or its label (regarding the traceability lot code or traceability product identifier), such as by combining ingredients or processing a food (e.g., by cutting, cooking, commingling, repacking, or repackaging). The proposed definition further specifies that transformation would not include the initial packing of a single-ingredient food or creating a food.

In this example, **Table 3.i** shows the Transformation KDEs kept by *Fresh Processor* during the production of three finished lots of salad kits using three discrete lots of cherry tomatoes and iceberg lettuce.

As in prior examples, **Table 3.i** does not include certain product description and location description information, because *Fresh Processor* chooses to utilize master files to link such information to the relevant traceability product identifiers and location identifiers, respectively.

Table 3.i. Processor example, transformation KDEs ([Proposed § 1.1340](#))

FTL Food Used Traceability Lot Code (keep)	FTL Food Used Quantity (keep)	FTL Food Used Traceability Product Identifier (keep)	FTL Food Produced New Traceability Lot Code (keep)	FTL Food Produced Transform Location Identifier (keep)	FTL Food Produced Transformation Date Completed (keep)	FTL Food Produced Quantity and Unit of Measure (keep)	FTL Food Produced Traceability Product Identifier (keep)	Transformation Reference Record Type and Number (keep)
TOM-CHE-TTF1-091620	100 Cases	614141007349	FPP16-091920	FP-PL-16	9/19/2020	200 Cases	999999	WO 123456
ZZZ-091420	50 Cases	348103223852	FPP16-091920	FP-PL-16	9/19/2020	200 Cases	999999	WO 123456
TOM-CHE-TTF1-091820	100 Cases	614141007349	FPP16-092120	FP-PL-16	9/21/2020	200 Cases	999999	WO 123457
ZZZ-091620	50 Cases	348103223852	FPP16-092120	FP-PL-16	9/21/2020	200 Cases	999999	WO 123457
TOM-CHE-TTF1-091920	100 Cases	614141007349	FPP16-092320	FP-PL-16	9/23/2020	200 Cases	999999	WO 123458
ZZZ-091720	50 Cases	348103223852	FPP16-092320	FP-PL-16	9/23/2020	200 Cases	999999	WO 123458

III.j Processor’s Shipping KDEs (kept and sent)

[Proposed § 1.1350\(a\)](#) would require persons subject to subpart S to establish and maintain records containing specific KDEs related to the shipping of listed foods. In addition, proposed § 1.1350(b)(1) would require that some (but not all) of the KDEs identified in proposed § 1.1350(a) be sent to the immediate subsequent recipient of the food, either in electronic or written form.

Fresh Processor maintains this information in **Table 3j**.

Each column title in **Table 3.j** indicates whether the data is kept and sent, or simply kept.

Similar to what is described above regarding the shipping KDEs for *Tom’s Produce*, **Table 3.j** does not include various product description and location description information. This is because *Fresh Processor* chooses to instead provide relevant entries from their master files, which link the product descriptions and location descriptions to the relevant traceability product identifiers and location identifiers, respectively.

Table 3.j Processor example, shipping KDEs ([Proposed § 1.1350](#))

Reference Record Type and Number (keep)	Transporter Name (keep)	Import Entry Number (keep & send)	Traceability Lot Code (keep & send)	Quantity and Unit of Measure (keep & send)	Traceability Product Identifier (keep & send)	Traceability Lot Code Generator Location Identifier (keep & send)	Traceability Lot Code Generator Point of Contact Name (keep & send)	Traceability Lot Code Generator Point of Contact Phone (keep & send)	Traceability Lot Code Generator Point of Contact Email* (keep & send)	Location Identifier for immediate subsequent recipient (keep & send)	Location Identifier from which the food was shipped (keep & send)	Shipment Date and Time (keep & send)
ASN 77777	XYZ Shipping Co.	N/A	FPP16-091920	200 Cases	999999	FP-PL-16	Bob Brown	777-777-7778	bbrown@processor.com	DC-100	FP-PL-16	9/20/20 9:00 AM
ASN 77778	XYZ Shipping Co.	N/A	FPP16-092120	200 Cases	999999	FP-PL-16	Bob Brown	777-777-7778	bbrown@processor.com	DC-100	FP-PL-16	9/22/20 10:00 AM
ASN 77779	XYZ Shipping Co.	N/A	FPP16-092320	200 Cases	999999	FP-PL-16	Bob Brown	777-777-7778	bbrown@processor.com	DC-100	FP-PL-16	9/23/20 8:00 AM

* [Proposed § 1.1310](#) defines “point of contact” to mean “an individual having familiarity with an entity's procedures for traceability, including their name, telephone number, and, if available, their email address and fax number.” In this example there is an email available (shown in table), but there is no fax number available.

IV. Food Distributor Traceability Records

IV.a Distributor's Scenario Overview

- The next point in this example supply chain is the distributor, *Food Distributors*. *Food Distributors* receives salad kits from *Fresh Processor* and distributes salad kits to *Retailer*
- The companies *Food Distributors* works with are:
 - *Fresh Processor* – receives ingredients, processes and ships salad kits to *Food Distributors*
 - *Retailer* – receives salad kits from *Food Distributors* and sells salad kits to consumers

IV.b Distributor’s Traceability Program Records, Description of Reference Records

[Proposed § 1.1315\(a\)\(1\)](#) would require persons subject to subpart S to establish and maintain a description of the reference records in which they maintain the information required under subpart S, an explanation of where on the records the required information appears, and, if applicable, a description of how reference records for different tracing events for a food (e.g., receipt, transformation, shipment) are linked.

Food Distributors maintains this information in **Table 4.b**.

Table 4.b Distributor example, description of reference records ([Proposed § 1.1315\(a\)\(1\)](#))

Rule CTE	Reference Record	Rule KDE	Field Name on record
Receiving	Advanced Shipment Notice	Reference record type and number	asn_number
Receiving	Advanced Shipment Notice	Import entry number	N/A
Receiving	Advanced Shipment Notice	Transporter name	transporter_name
Receiving	Advanced Shipment Notice	Traceability lot code	lot
Receiving	Advanced Shipment Notice	Quantity and unit of measure	quantity, unit_of_measure
Receiving	Advanced Shipment Notice	Traceability product identifier	traceability_product_id
Receiving	Advanced Shipment Notice	Traceability product description	product_description
Receiving	Advanced Shipment Notice	Lot code generator location identifier and description	traceability_lot_code_generator
Receiving	Advanced Shipment Notice	Lot code generator point of contact	tlcg_point_of_contact_name tlcg_point_of_contact_phone tlcg_point_of_contact_email
Receiving	Advanced Shipment Notice	Immediate previous source location identifier and description	ship_to_location_id
Receiving	Advanced Shipment Notice	Location ID and description of where the food was received	ship_from_location_id
Receiving	Advanced Shipment Notice	Date and time when food was received	ship_date

Table 4.b Distributor example, description of reference records ([Proposed § 1.1315\(a\)\(1\)](#)) continued

Rule CTE	Reference Record	Rule KDE	Field Name on Record
Shipping	Proof of Delivery Notice (electronic)	Reference record type and number	pod_number
Shipping	Proof of Delivery Notice (electronic)	Import entry number	N/A
Shipping	Proof of Delivery Notice (electronic)	Transporter name	transporter_name
Shipping	Proof of Delivery Notice (electronic)	Traceability lot code	lot
Shipping	Proof of Delivery Notice (electronic)	Quantity and unit of measure	quantity, unit_of_measure
Shipping	Proof of Delivery Notice (electronic)	Traceability product identifier	traceability_product_id
Shipping	Proof of Delivery Notice (electronic)	Traceability product description	product_description
Shipping	Proof of Delivery Notice (electronic)	Lot code generator location identifier and description	traceability_lot_code_generator
Shipping	Proof of Delivery Notice (electronic)	Lot code generator point of contact	tlcg_point_of_contact_name tlcg_point_of_contact_phone tlcg_point_of_contact_email
Shipping	Proof of Delivery Notice (electronic)	Immediate subsequent recipient location identifier and description	ship_to_location_id
Shipping	Proof of Delivery Notice (electronic)	Location identifier and description from which the food was Shipped	ship_from_location_id
Shipping	Proof of Delivery Notice (electronic)	Date and time when food was shipped	ship_date

IV.c Distributor’s Traceability Program Records, Listing of FTL Foods Shipped

[Proposed § 1.1315\(a\)\(2\)](#) would require persons subject to subpart S to establish and maintain a list of foods on the Food Traceability List that they ship, including the traceability product identifier and traceability product description for each food.

In this example, *Food Distributors* maintains a list of the salad kits that they ship in **Table 4.c**.

Table 4.c Distributor example, listing of FTL foods shipped ([Proposed § 1.1315\(a\)\(2\)](#))

Traceability Product Identifier	Category Code or Term	Category Name	Brand Name	Commodity	Variety	Product Name	Packaging Size	Packaging Style
999999	FV-FC	Fruits and Vegetables (fresh-cut)	Fresh Processor	n/a	n/a	Garden Salad Kit 10 X 12 OZ (UPC: 99999999)	8 LB	Carton

IV.d Distributor’s Traceability Program Records, Other Information, Location Master Listing

[Proposed § 1.1315\(a\)\(4\)](#) would require persons subject to subpart S to establish and maintain records containing any other information needed to understand the data provided within any required subpart S records, such as internal or external coding systems, glossaries, and abbreviations.

In this example, *Food Distributors* has opted to maintain a location master list that links each location identifier that is used in their recordkeeping to the corresponding location description, as shown in **Table 4.d**.

Table 4.d Distributor example, other information, location master list ([Proposed § 1.1315\(a\)\(4\)](#))

Location Identifier	Business Name	Physical Location Name	Primary Phone	Street Address or Geographical Coordinates	City	State	ZIP Code
FP-PL-16	Fresh Processor	Plant #16	818.818.8181	60 Elm St	Everytown	SC	99999
DC-100	Food Distributors	DC #100	999.999.9999	100 Main St	Anytown	GA	99999
RST-1052	Retailer	Store #1052	333.333.3333	222 Stone St	Anytown	SC	99999

IV.e Distributor’s Traceability Program Records, Other Information, Listing of FTL Foods Received

[Proposed § 1.1315\(a\)\(4\)](#) would require persons subject to subpart S to establish and maintain records containing any other information needed to understand the data provided within any required subpart S records, such as internal or external coding systems, glossaries, and abbreviations.

In this example, *Food Distributors* has opted to maintain a master list of FTL foods received that links the traceability product identifiers for those foods with the corresponding traceability product descriptions. This is shown in **Table 4.e**.

Table 4.e Distributor example, other information, listing of FTL foods received ([Proposed § 1.1315\(a\)\(4\)](#))

Traceability Product Identifier (keep)	Category Code or Term (keep)	Category Name (keep)	Brand Name (keep)	Commodity (keep)	Variety (keep)	Product Name (keep)	Packaging Size (keep)	Packaging Style (keep)
999999	FV-FC	Fruits and Vegetables (fresh-cut)	Fresh Processor	n/a	n/a	Garden Salad Kit 10 X 12 OZ (UPC: 99999999)	8 LB	Carton

IV.f Distributor's Receiving KDEs (kept)

[Proposed § 1.1335](#) would require persons subject to subpart S to establish and maintain records containing KDEs related to the receiving of listed foods

Food Distributors maintains this information in **Table 4.f**.

As in prior examples, **Table 4.f** does not include certain product description and location description information, because *Food Distributors* chooses to utilize master files to link such information to the relevant traceability product identifiers and location identifiers, respectively.

Table 4.f Distributor example, receiving KDEs ([Proposed § 1.1335](#))

Reference Record Type and Number (keep)	Transporter Name (keep)	Import Entry Number (keep)	Traceability Lot Code (keep)	Quantity and Unit of Measure (keep)	Traceability Product Identifier (keep)	Traceability Lot Code Generator Location Identifier (keep)	Traceability Lot Code Generator Point of Contact (keep)	Traceability Lot Code Generator Point of Contact Phone (keep & send)	Traceability Lot Code Generator Point of Contact Email* (keep & send)	Location Identifier for where food was received (keep)	Location Identifier for the immediate previous source (keep)	Receipt Date and Time (keep)
ASN 77777	XYZ Shipping Co.	N/A	FPP16-091920	200 Cases	999999	FP-PL-16	Bob Brown	777-777-7778	bbrown@processor.com	DC-100	FP-PL-16	9/20/20 9:00 AM
ASN 77778	XYZ Shipping Co.	N/A	FPP16-092120	200 Cases	999999	FP-PL-16	Bob Brown	777-777-7778	bbrown@processor.com	DC-100	FP-PL-16	9/22/20 10:00 AM
ASN 77779	XYZ Shipping Co.	N/A	FPP16-092320	200 Cases	999999	FP-PL-16	Bob Brown	777-777-7778	bbrown@processor.com	DC-100	FP-PL-16	9/23/20 8:00 AM

* [Proposed § 1.1310](#) defines “point of contact” to mean “an individual having familiarity with an entity's procedures for traceability, including their name, telephone number, and, if available, their email address and fax number.” In this example there is an email available (shown in table), but there is no fax number available.

IV.g. Distributor’s Shipping KDEs (kept and sent)

[Proposed § 1.1350\(a\)](#) would require persons subject to subpart S to establish and maintain records containing specific KDEs related to the shipping of listed foods. In addition, proposed § 1.1350(b)(1) would require that some (but not all) of the KDEs identified in proposed § 1.1350(a) be sent to the immediate subsequent recipient of the food, either in electronic or written form.

Food Distributor maintains this information in **Table 4.g**.

Each column title in **Table 4.g** indicates whether the data is kept and sent, or simply kept.

Similar to what is described above regarding the shipping KDEs for *Tom’s Produce* and *Fresh Processor*, **Table 4.g** does not include various product description and location description information. This is because *Food Distributors* chooses to instead provide relevant entries from their master files, which link the product descriptions and location descriptions to the relevant traceability product identifiers and location identifiers, respectively.

Table 4.g. Distributor example, shipping KDEs ([Proposed § 1.1350](#))

Reference Record Type and Number (keep)	Transporter Name (keep)	Import Entry Number (keep & send)	Traceability Lot Code (keep & send)	Quantity and Unit of Measure (keep & send)	Traceability Product Identifier (keep & send)	Traceability Lot Code Generator Location Identifier (keep & send)	Traceability Lot Code Generator Point of Contact (keep & send)	Traceability Lot Code Generator Point of Contact Phone (keep & send)	Traceability Lot Code Generator Point of Contact Email* (keep & send)	Location Identifier for immediate subsequent recipient (keep & send)	Location Identifier from which the food was shipped (keep & send)	Shipment Date and Time (keep & send)
POD 63264	Foodretail Trucking	N/A	FPP16-091920	5 Cases	999999	FP-PL-16	Bob Brown	777-777-7778	bbrown@processor.com	RST-1052	DC-100	9/21/20 8:00 AM
POD 63265	Foodretail Trucking	N/A	FPP16-092120	4 Cases	999999	FP-PL-16	Bob Brown	777-777-7778	bbrown@processor.com	RST-1052	DC-100	9/23/20 6:00 AM
POD 63266	Foodretail Trucking	N/A	FPP16-092320	3 Cases	999999	FP-PL-16	Bob Brown	777-777-7778	bbrown@processor.com	RST-1052	DC-100	9/24/20 7:00 AM

* [Proposed § 1.1310](#) defines “point of contact” to mean “an individual having familiarity with an entity’s procedures for traceability, including their name, telephone number, and, if available, their email address and fax number.” In this example there is an email available (shown in table), but there is no fax number available.

V. Retailer Traceability Records

V.a Retailer Scenario Overview

- The last point in this example supply chain is the retail food establishment, *Retailer*. *Retailer* receives salad kits from *Food Distributors* and sells salad kits to consumers. *Fresh Processor* is the lot code generator for the salad kits.

V.b Retailer’s Traceability Program Records, Description of Reference Records

[Proposed § 1.1315\(a\)\(1\)](#) would require persons subject to subpart S to establish and maintain a description of the reference records in which they maintain the information required under subpart S, an explanation of where on the records the required information appears, and, if applicable, a description of how reference records for different tracing events for a food (e.g., receipt, transformation, shipment) are linked.

Retailer maintains this information in **Table 5.b**.

Table 5.b Retailer example, description of reference records ([Proposed § 1.1315\(a\)\(1\)](#))

Rule CTE	Reference Record	Rule KDE	Field Name on record
Receiving	Proof of Delivery Notice (electronic)	Reference record type and number	pod_number
Receiving	Proof of Delivery Notice (electronic)	Import entry number	N/A
Receiving	Proof of Delivery Notice (electronic)	Transporter name	transporter_name
Receiving	Proof of Delivery Notice (electronic)	Traceability lot code	lot
Receiving	Proof of Delivery Notice (electronic)	Quantity and unit of measure	quantity, unit_of_measure
Receiving	Proof of Delivery Notice (electronic)	Traceability product identifier	traceability_product_id
Receiving	Proof of Delivery Notice (electronic)	Traceability product description	product_description
Receiving	Proof of Delivery Notice (electronic)	Lot code generator location identifier and description	traceability_lot_code_generator
Receiving	Proof of Delivery Notice (electronic)	Lot code generator point of contact	tlcg_point_of_contact_name tlcg_point_of_contact_phone tlcg_point_of_contact_email
Receiving	Proof of Delivery Notice (electronic)	Immediate previous source location identifier and description	ship_to_location_id
Receiving	Proof of Delivery Notice (electronic)	Location identifier and description of where the food was received	ship_from_location_id
Receiving	Proof of Delivery Notice (electronic)	Date and time when food was received	ship_date

V.c Retailer’s Traceability Program Records, Other Information, Location Master Listing

[Proposed § 1.1315\(a\)\(4\)](#) would require persons subject to subpart S to establish and maintain records containing any other information needed to understand the data provided within any required subpart S records, such as internal or external coding systems, glossaries, and abbreviations.

In this example, *Retailer* has opted to maintain a location master list that links each location identifier that is used in their recordkeeping to the corresponding location description, as shown in **Table 5.c**.

Table 5.c Retailer example, other information, location master list ([Proposed § 1.1315\(a\)\(4\)](#))

Location Identifier	Business Name	Physical Location Name	Primary Phone	Street Address or Geographical Coordinates	City	State	ZIP Code
FP-PL-16	Fresh Processor	Plant #16	818.818.8181	60 Elm St	Everytown	SC	99999
DC-100	Food Distributors	DC #100	999.999.9999	100 Main St	Anytown	GA	99999
RST-1052	Retailer	Store #1052	333.333.3333	222 Stone St	Anytown	SC	99999

V.d Retailer’s Traceability Program Records, Other Information, Listing of FTL Foods Received

[Proposed §1.1315\(a\)\(4\)](#) would require persons subject to subpart S to establish and maintain records containing any other information needed to understand the data provided within any required subpart S records, such as internal or external coding systems, glossaries, and abbreviations.

In this example, *Retailer* has opted to maintain a master list of FTL foods received that links the traceability product identifiers for those foods with the corresponding traceability product descriptions. This is shown in **Table 5.d**.

Table 5.d Retailer example, other information, listing of FTL foods received ([Proposed § 1.1315\(a\)\(4\)](#))

Traceability Product Identifier	Category Code or Term	Category Name	Brand Name	Commodity	Variety	Product Name	Packaging Size	Packaging Style
999999	FV-FC	Fruits and Vegetables (fresh-cut)	Fresh Processor	n/a	n/a	Garden Salad Kit 10 X 12 OZ (UPC: 99999999)	8 LB	Carton

V.e Retailer's Receiving KDEs (kept)

[Proposed § 1.1335](#) would require persons subject to subpart S to establish and maintain records containing KDEs related to the receiving of listed foods.

Retailer maintains this information in **Table 5.e**.

As in prior examples, **Table 5.e** does not include certain product description and location description information, because *Retailer* chooses to utilize master files to link such information to the relevant traceability product identifiers and location identifiers, respectively.

Table 5.e Retailer example, receiving KDEs ([Proposed § 1.1335](#))

Reference Record Type and Number (keep)	Transporter Name (keep)	Import Entry Number (keep)	Traceability Lot Code (keep)	Quantity and Unit of Measure (keep)	Traceability Product Identifier (keep)	Traceability Lot Code Generator Location Identifier (keep)	Traceability Lot Code Generator Point of Contact (keep)	Traceability Lot Code Generator Point of Contact Phone (keep & send)	Traceability Lot Code Generator Point of Contact Email* (keep & send)	Location Identifier for where food was received (keep)	Location Identifier for the immediate previous source (keep)	Receipt Date and Time (keep)
POD 63264	Foodretail Trucking	N/A	FPP16-091920	5 Cases	999999	FP-PL-16	Bob Brown	777-777-7778	bbrown@processor.com	RST-1052	DC-100	9/21/20 8:00 AM
POD 63265	Foodretail Trucking	N/A	FPP16-092120	4 Cases	999999	FP-PL-16	Bob Brown	777-777-7778	bbrown@processor.com	RST-1052	DC-100	9/23/20 6:00 AM
POD 63266	Foodretail Trucking	N/A	FPP16-092320	3 Cases	999999	FP-PL-16	Bob Brown	777-777-7778	bbrown@processor.com	RST-1052	DC-100	9/24/20 7:00 AM

* [Proposed § 1.1310](#) defines “point of contact” to mean “an individual having familiarity with an entity's procedures for traceability, including their name, telephone number, and, if available, their email address and fax number.” In this example there is an email available (shown in table), but there is no fax number available.

VI. Conclusion

The diagram below shows the traceability records covered in this example.

Diagram 6.a

