



September 23, 2008

## **FDA CONSIDERING TRACING REQUIREMENTS FOR PRODUCE**

The U.S. Food and Drug Administration (FDA) is soliciting public input and considering “mechanisms to enhance product tracing systems for fresh produce.” The FDA said the mechanisms would “improve FDA's ability ... to identify the source of contamination associated with fresh produce-related outbreaks of foodborne illness.”

FDA will hold two public meetings to discuss produce tracing systems. The first will be in College Park, Md., on Oct. 16. The second will be in Oakland, Calif., on Nov. 13. AFTC yesterday received an advance copy of the announcement detailing FDA's plans that will be published in the Federal Register tomorrow. While the discussion of tracing requirements applies specifically to fresh produce, AFTC members hauling food should take notice since the precedents could eventually carry over into other areas.

When foodborne illness occurs, a product tracing system should enable a link in the supply chain or a public health agency conducting a traceback investigation to identify, at any stage of the supply chain, where the fresh produce came from, where the produce was or is, where the produce went, and who transported the produce. This is commonly known as a "one up/one down" or "one step back/one step forward" system. Records in such a system are either paper-based, human-readable records; or technology-based records with automated data capture using bar codes or radiofrequency identification (RFID), which may or may not be human readable.

A person making a paper record may err in writing down information. Mistakes can be reduced if the identifier is recorded using an automatic system such as a bar code or RFID. These technology-based systems also can greatly speed a traceback investigation.

Issues and questions to be discussed at the two upcoming public hearings will include:

- What are the costs, benefits and feasibility of implementing an enhanced product tracing system?
- Would enhancing FDA's role in developing and implementing product tracing systems for fresh produce, through increased regulation, guidance or additional legal authorities, improve the effectiveness of traceback investigations and traceforward operations?
- What mandatory and voluntary measures would be most effective in achieving the goal of enhancing product tracing systems for fresh produce and improving FDA's ability to use the information in such systems to identify the source of contamination associated with fresh produce-related outbreaks of foodborne illness?
- How would these measures help FDA work better with industry and other stakeholders during traceback investigations and traceforward operations?

The FDA announcement outlines nine specific issues and questions for discussion during these meetings.

A full copy of the notice can be found at this website link:

<http://www.fda.gov/OHRMS/DOCKETS/98fr/FDA-2008-N-0513-nmsave.pdf>

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