



FOOD TRACEABILITY UPDATE

October 17, 2008

The U.S. Food and Drug Administration's (FDA) first meeting on produce traceability, held yesterday in College Park, Md., provided insight into where the industry and FDA may be headed on this important topic.

At this point it is not clear whether the government will issue new regulations or let the industry pursue their own solutions. This is an educational and evolutionary process and no declarations were made. It seems that the door is still open to all possibilities so all of us in the industry need to be engaged in the process to steer it in the right direction.

As often occurs, some of the most interesting information was gathered in side conversations in the hall. Several agriculture lobbyists seem to agree that there is a high probability that Congress could pass new legislation addressing food safety issues next year. What such legislation may eventually look like is anyone's guess at this point.

This effort by FDA is focusing on fresh produce. However, the tracing systems set into place, whether industry-led or government regulations, could be extended to other areas of food handling. That was made clear in a conversation with an FDA official about the recent report that tainted milk from China was an ingredient in products in other countries.

FDA officials made it clear that they intend to look at all aspects of the supply chain. While trucking is not the primary focus of this discussion it will clearly not be exempt from examination. A high-level FDA official in one of the first presentations of the day described an incident of truck transportation being the source of food contamination. In that case, ice cream was hauled in a trailer that had previously held raw eggs. It was pointed out that this occurred 15 or 20 years ago.

While standardization of recordkeeping would help, FDA officials indicated that they do not intend to mandate a standard format as long as the information provided in a recall is appropriate and adequate. While state agencies may be involved in a regulatory and inspection role, interstate shipments would be the jurisdiction of the FDA.

Much discussion occurred regarding industry-led efforts of the Produce Marketing Association (PMA) and United Fresh Produce Association (UF). The Produce Traceability Initiative (PTI) has been a multiyear effort that has recently produced consensus for enhanced tracing systems among produce growers and shippers. PTI would use UPC bar codes on produce cases and would require many in the produce industry to incur a significant cost to upgrade their capabilities. The bar code would be read by each handler in the distribution process. However, the presentation did not list the transporter as required to read each bar code. I had direct discussions with PMA and UF representatives yesterday and have a meeting scheduled for more detailed discussions next week with UF.

The FDA's next meeting on food traceability will be held Nov. 13 in Oakland, Calif.

Information about the PTI can be found at:

<http://www.pma.com/cig/tech/traceability.cfm>

<http://www.pma.com/issues/TraceabilityComments.cfm>

A conference call for detailed discussions about this issue among all food transporters could be helpful.

As always, if you have any questions please let me know.