Creation and Transformation
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Creating means making or producing a food on the Food Traceability List (e.g., through manufacturing or processing) using only ingredient(s) that are not on the Food Traceability List. Creating does not include originating or transforming a food.

Transformation means 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). Transformation does not include the initial packing of a single-ingredient food or creating a food.
Peanut butter is an example of a food that is created.
• Peanut butter is a food on the Food Traceability List (FTL) that is made from peanuts and additional ingredients that may include salt, sweeteners, and/or emulsifiers.
• Since the individual ingredients of peanut butter do not appear on the FTL, peanut butter is considered a created food for the purposes of traceability.

Peanut butter sandwich crackers are an example of a food that is transformed.
• Peanut butter sandwich crackers are a product made from a food on the FTL.
• Peanut butter is added between baked crackers and packaged without further processing and is considered a transformed food for the purposes of traceability.

Peanut butter cookies are an example of a food that is transformed, however...
• If the cookies are made with peanut butter and a kill step is applied, recordkeeping requirements would not apply to that person’s subsequent shipping of the food, provided that the person maintained a record of application of the kill step.
• And for any persons who receive a food on the Food Traceability List that has been subjected to a kill step, recordkeeping requirements would not apply to that person’s receipt or subsequent transformation and/or shipping of the food.
Soft Cheese

NOT ON FTL
Not covered by rule

SoFT CHeese ON FTL • Covered by rule

FARM
MILK
MANUFACTURER

CREATION

MANUFACTURER

DISTRIBUTOR

RETAILER
Soft Cheese with Fresh Herbs

In this example, the manufacturer is producing a food using two ingredients (milk and salt) that are not on the FTL, and one ingredient (fresh herbs) that is on the FTL. Because one of the ingredients is on the FTL, this is a Transformation event, and the manufacturer would be required to maintain KDEs for Transformation. Note that if a plain soft cheese product were produced, using only ingredients that are not on the FTL, this would be a Creation event. The Proposed Rule defines “creating” to mean making or producing a food on the FTL using only ingredients that are not on the FTL.
Potato Deli Salad
Peanut Butter and Peanut Butter Crackers (No kill step)
Peanut Butter and Peanut Butter Cookies (Kill step)
Cucumbers

Cucumbers ON FTL • Covered by rule

FARM ➔ ON-FARM PACKER ➔ REPACKER ➔ DISTRIBUTOR ➔ RETAILER

TRANSFORMATION
Jars of Salsa (kill step applied)
Fresh-Cut Romaine

Leafy greens ON FTL • Covered by rule