

Retail food establishments (RFEs) and restaurants:



What records do I need to keep for the Food Traceability Rule?

Recordkeeping requirements under the rule depend on the activity (Critical Tracking Event or CTE) being conducted by the regulated entity. Generally, RFEs and restaurants must maintain receiving records as described in 21 CFR § 1.1345. The following key data elements (KDEs) must be maintained and linked to the traceability lot for the food:

- Traceability lot code for the food
- Quantity and unit of measure of the food
- Product description for the food
- Location description for the immediate previous source of the food
- Location description for where the food was received
- Date you received the food
- Location description for the traceability lot code source, or the traceability lot code source reference
- Reference document type and reference document number

If an RFE or restaurant receives a food from a **person who is exempt from the rule**, you must maintain, and link to the traceability lot of the food, the following KDEs:

- Quantity and unit of measure of the food
- Product description for the food
- Location description for the immediate previous source of the food
- Location description for where the food was received
- Date you received the food
- Reference document type and reference document number

In most situations, the shipper of the food will send you most of the above KDEs. You may be required to keep other records depending on whether you are performing any other critical tracking events.

Do I have to keep records for FTL foods I transform and sell directly to consumers (e.g., a fresh salad prepared in a restaurant kitchen and then sold to a restaurant customer)?

No, 21 CFR § 1.1350(c) states that the transformation KDEs do not apply to RFEs and restaurants with respect to foods they do not ship (e.g., foods they sell or send directly to consumers). However, an entity such as a central kitchen that transforms a food and ships it to a business such as a restaurant or RFE must keep the required records.

Does FDA require a specific application or technology for keeping records?

No. In accordance with [FSMA 204\(d\)\(1\)\(C\)](#), the final rule does not prescribe specific technologies for the maintenance of records. Records may be kept as original paper or electronic records or true copies (such as photocopies, pictures, scanned copies, or other accurate reproductions of the original records). Records must be legible and stored to prevent deterioration or loss. Electronic records may include valid, working electronic links to the information required to be maintained under the final rule.

However, in certain circumstances when the public health is threatened, we may request that information about specific foods and specific date ranges (or traceability lot code ranges) be provided to us in an electronic sortable spreadsheet in accordance with 21 CFR § 1.1455(c)(3)(ii), along with any other information needed to understand the information in the spreadsheet.

RFEs and restaurants with an average annual monetary value of food sold or provided during the previous 3-year period of no more than \$1,000,000 (on a rolling basis), adjusted for inflation, are exempt from the requirement to provide FDA with an electronic sortable spreadsheet upon request. However, those entities must still maintain the records required by the rule.

How will I receive records from my suppliers?

FDA does not require a specific format or technology for maintaining records and sharing them with supply chain partners. You may receive records from your suppliers via any of the methods currently used by the food industry, including bills of lading, invoices, advanced ship notices, packing lists, case labels, 2-D barcodes, etc. However, it is your responsibility to make sure you maintain all the KDEs required under the rule.

How long must I keep the records required by the rule?

In most cases, records containing the information required under the final rule must be maintained for 2 years from the date you created or obtained the records. One exception is for records maintained by an RFE or restaurant for food purchased directly from a farm; those records must be maintained for 180 days.

When do I need to comply with the Food Traceability Rule?

The compliance date for all covered entities is January 20, 2026.

You can find additional resources at our Food Traceability Final Rule page at www.fda.gov.

For additional questions:

The Technical Assistance Network (TAN) is a central source of information for questions related to the Food Safety Modernization Act (FSMA) rules, programs, and implementation strategies.

Submit Your Question Electronically:

Please [submit your question](#) to TAN for assistance.

Mail Your Question

If you prefer to mail in your question, please send it to the address below:

Food and Drug Administration
5001 Campus Drive
Wiley Building, HFS-009
Attn: FSMA Outreach
College Park, MD 20740

How TAN Works

Inquiries are answered by FDA Information Specialists or Subject Matter Experts, based on the complexity of the question. FDA will respond to inquiries received as soon as possible. However, response times may vary, due to complexity of question and the volume of inquiries we receive.

Once a question is submitted, the inquirer will receive notification of receipt and a case number to be referenced in future correspondence.