



Food Safety Modernization Act (FSMA) Food Traceability Rule

Supply Chain Examples Deli Salads

October 2023

Supply Chain Examples



The Food Traceability Rule requires persons who manufacture, process, pack, or hold foods on the Food Traceability List (FTL) to maintain and provide to their supply chain partners specific information – called **Key Data Elements** or KDEs – for certain **Critical Tracking Events** or CTEs in the food’s supply chain. This framework forms the foundation for effective and efficient tracing of food.

The following examples will walk through the Critical Tracking Events in a supply chain where Key Data Elements are required.

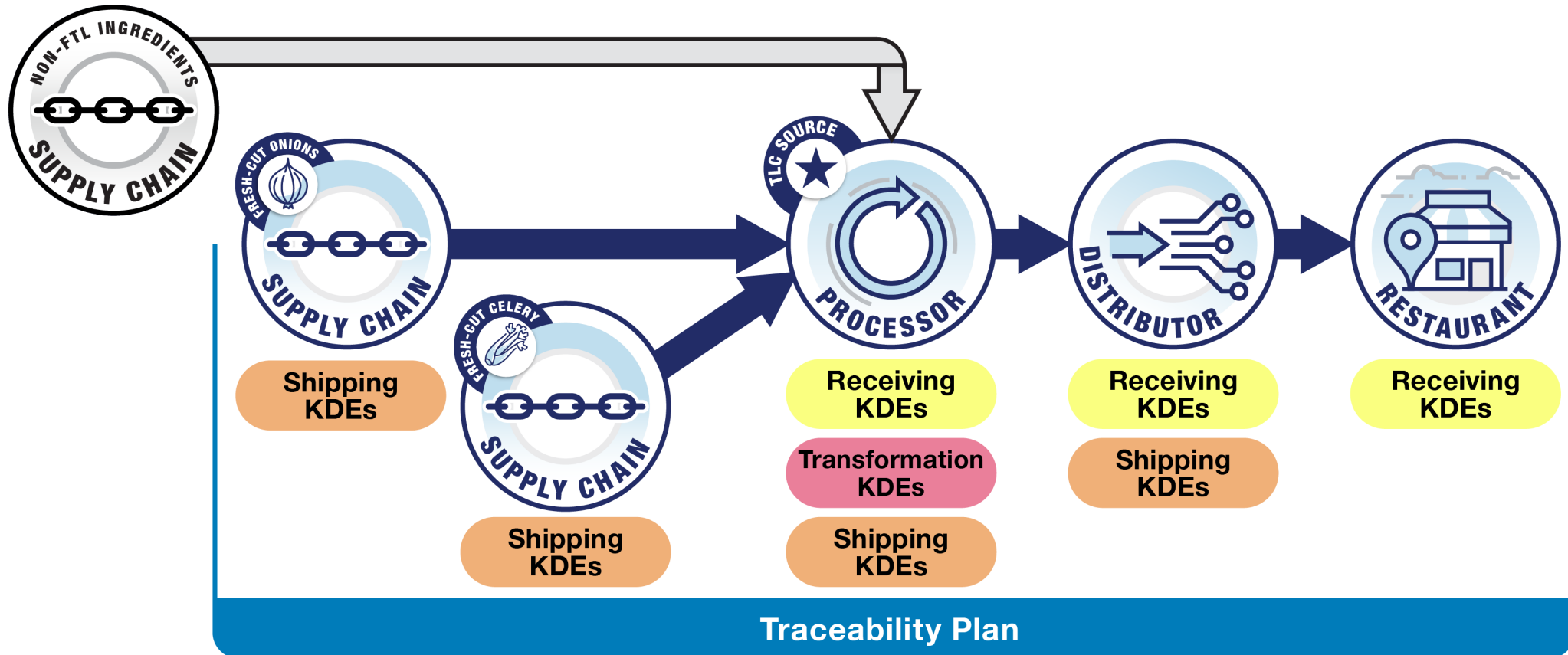
Abbreviations used:

- Key Data Elements or KDEs
- Critical Tracking Events or CTEs
- Food Traceability List or FTL
- Traceability Lot Code or TLC
- Raw Agricultural Commodities or RACs

Supply Chain Example: Deli salad using FTL ingredients and non-FTL ingredients



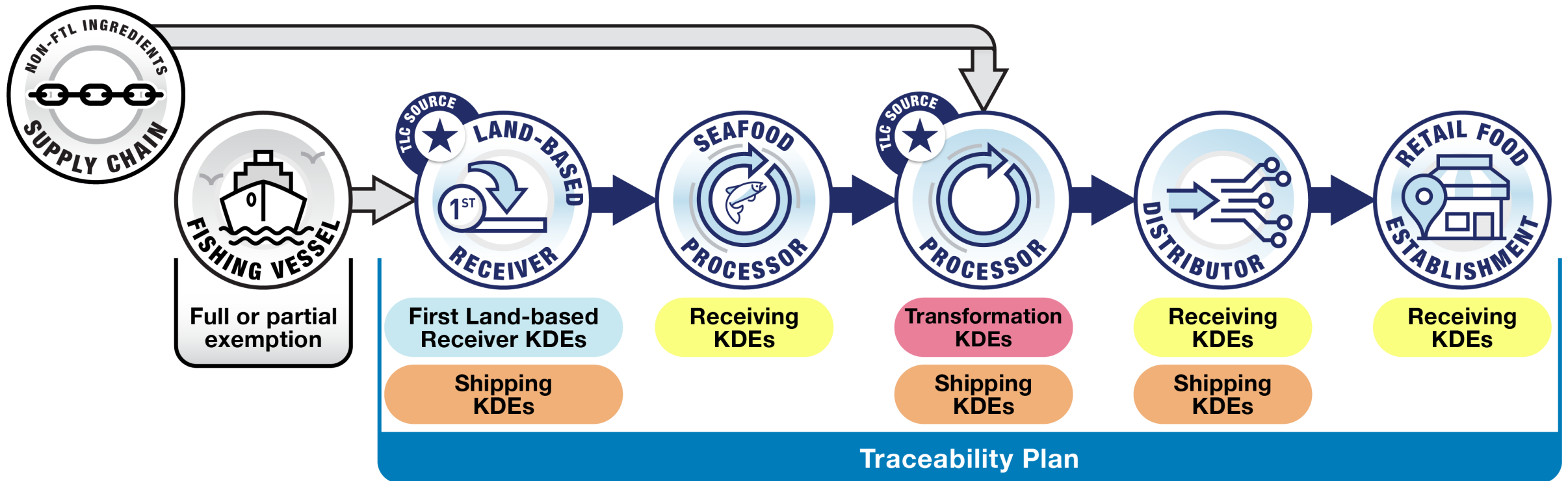
In this scenario, a deli salad is made with fresh-cut celery and fresh-cut onions, both of which are on the FTL, as well as other non-FTL ingredients. Since deli salads are on the FTL, the processor would need to maintain receiving KDEs for the FTL ingredients, as well as transformation KDEs and shipping KDEs for the deli salad. All entities in blue are covered by the final rule and must maintain a Traceability Plan, in addition to the KDEs. The suppliers of the fresh-cut onions and fresh-cut celery may be required to maintain other KDEs (in addition to shipping), depending on their role in the supply chain.



Supply Chain Example: Tuna salad using canned tuna



In this scenario, a deli salad is made with canned tuna and non-FTL ingredients. The seafood processor cans the tuna. Key Data Elements (KDEs) are required for the fresh tuna at the points indicated in the graphic. (Unless written agreements are in place, as described in § 1.1305(d)(6)). The seafood processor must maintain receiving KDEs for the fresh tuna. Since the seafood processor is changing the fresh tuna to a form that is not on the FTL (i.e., canned tuna), the seafood processor does not need to maintain transformation or shipping records. The processor who is making the deli salad would not need to maintain receiving records for the canned tuna because it is in a form that is not on the FTL. However, since deli salads are on the FTL, the processor would need to maintain transformation KDEs and shipping KDEs for the deli salad. All entities in blue are covered by the final rule and must maintain a Traceability Plan, in addition to the KDEs.





Visit <https://www.fda.gov/fsma> for additional information.