Food Safety Modernization Act (FSMA) Food Traceability Rule

Supply Chain Examples - Sprouts

April 2024

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 example will walk through the Critical Tracking Events in a supply chain where Key Data Elements are required.
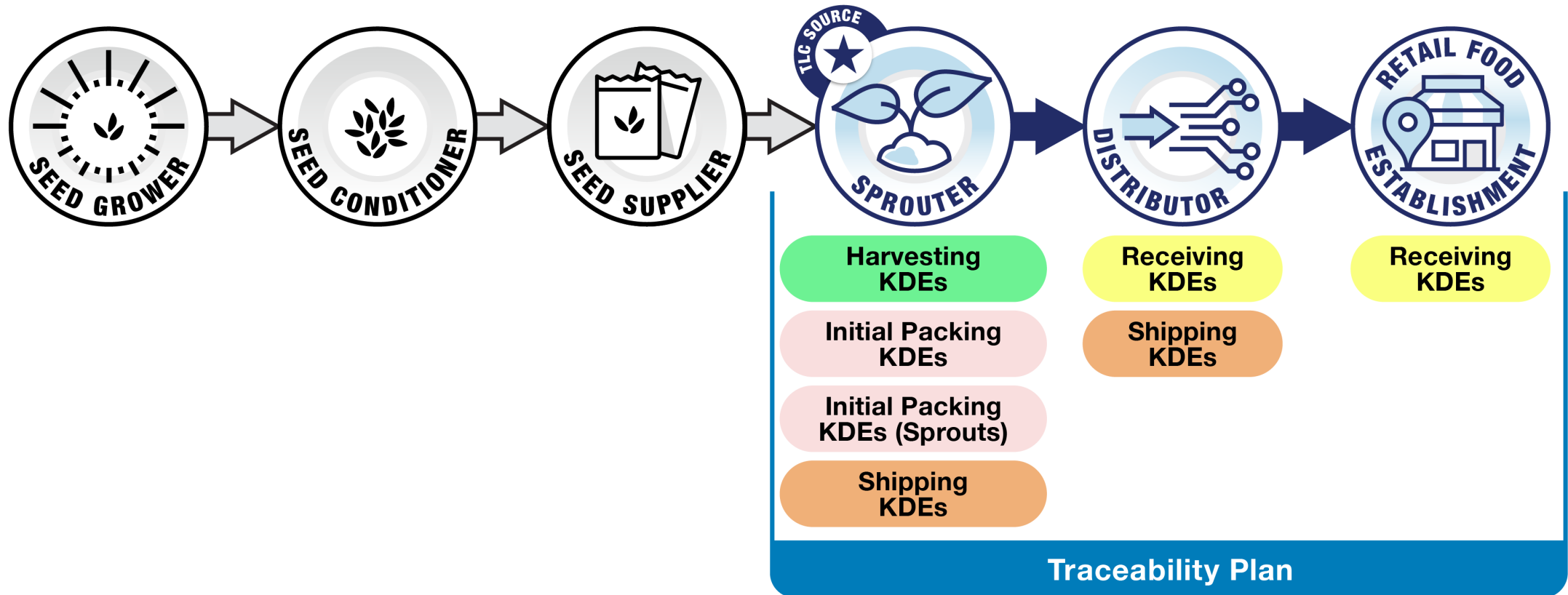
Abbreviations used:

- 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

Example: Sprouts Supply Chain

In this scenario, fresh sprouts are being packed by the sprout grower for sale at retail. Key Data Elements (KDEs) are required for the fresh sprouts at the points indicated in the graphic. Seeds are not on the Food Traceability List, so the seed grower, seed conditioner and seed supplier are not covered by the rule. As the initial packer of the sprouts, the sprouter must maintain certain KDEs related to the growing, conditioning, packing and supplying of the seeds. All entities in blue are covered by the rule and must maintain a Traceability Plan, in addition to the KDEs.

SEED GROWER → SEED CONDITIONER → SEED SUPPLIER → SPROUTER (TLC SOURCE ★) → DISTRIBUTOR → RETAIL FOOD ESTABLISHMENT

SPROUTER:
- Harvesting KDEs
- Initial Packing KDEs
- Initial Packing KDEs (Sprouts)
- Shipping KDEs

DISTRIBUTOR:
- Receiving KDEs
- Shipping KDEs

RETAIL FOOD ESTABLISHMENT:
- Receiving KDEs

Traceability Plan

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