

Food Safety Modernization Act (FSMA) Food Traceability Rule

Supply Chain Examples

March 2025

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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.

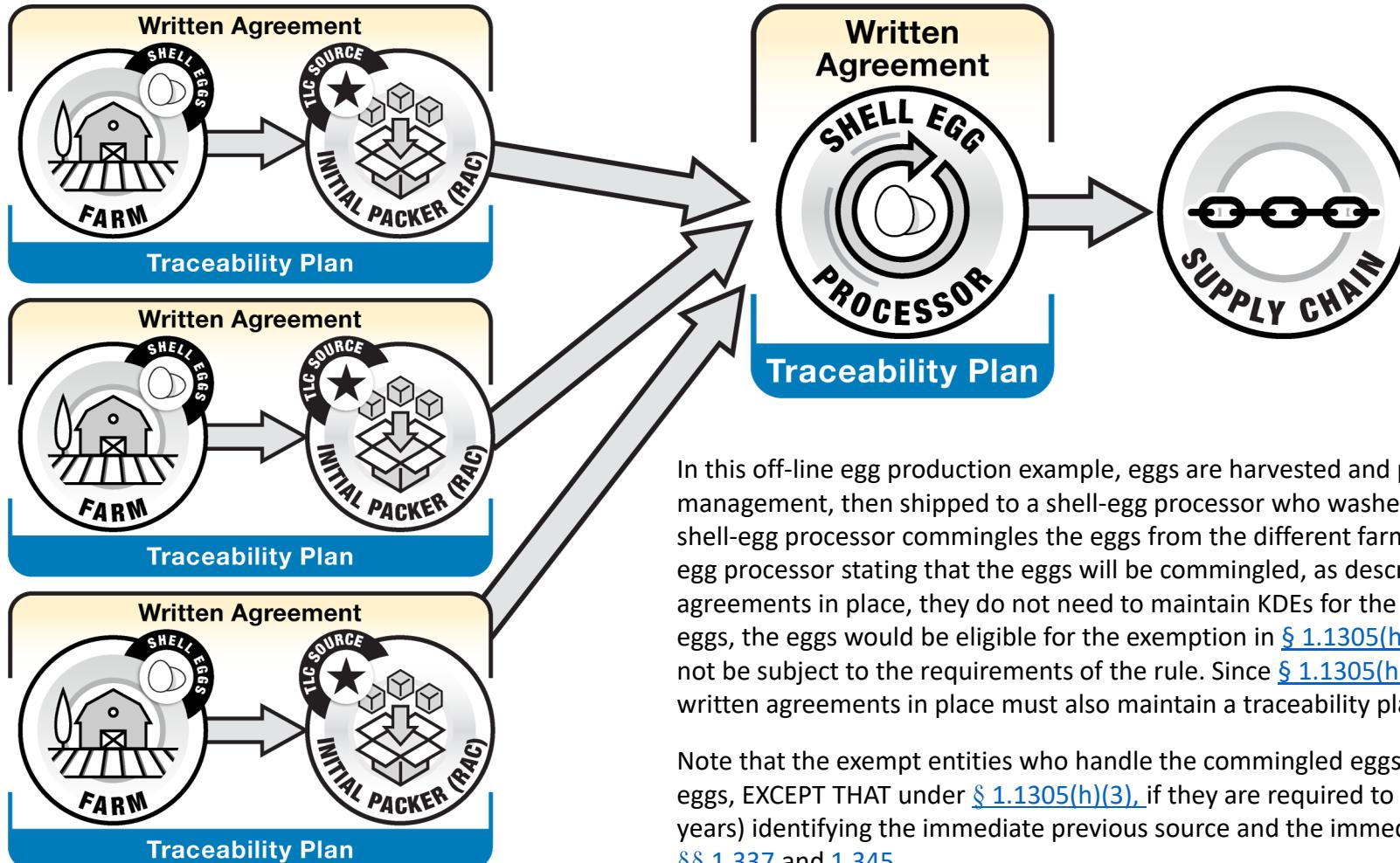
The following examples will walk through the Critical Tracking Events in a supply chain where Key Data Elements are required.

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: Commingled eggs with written agreements

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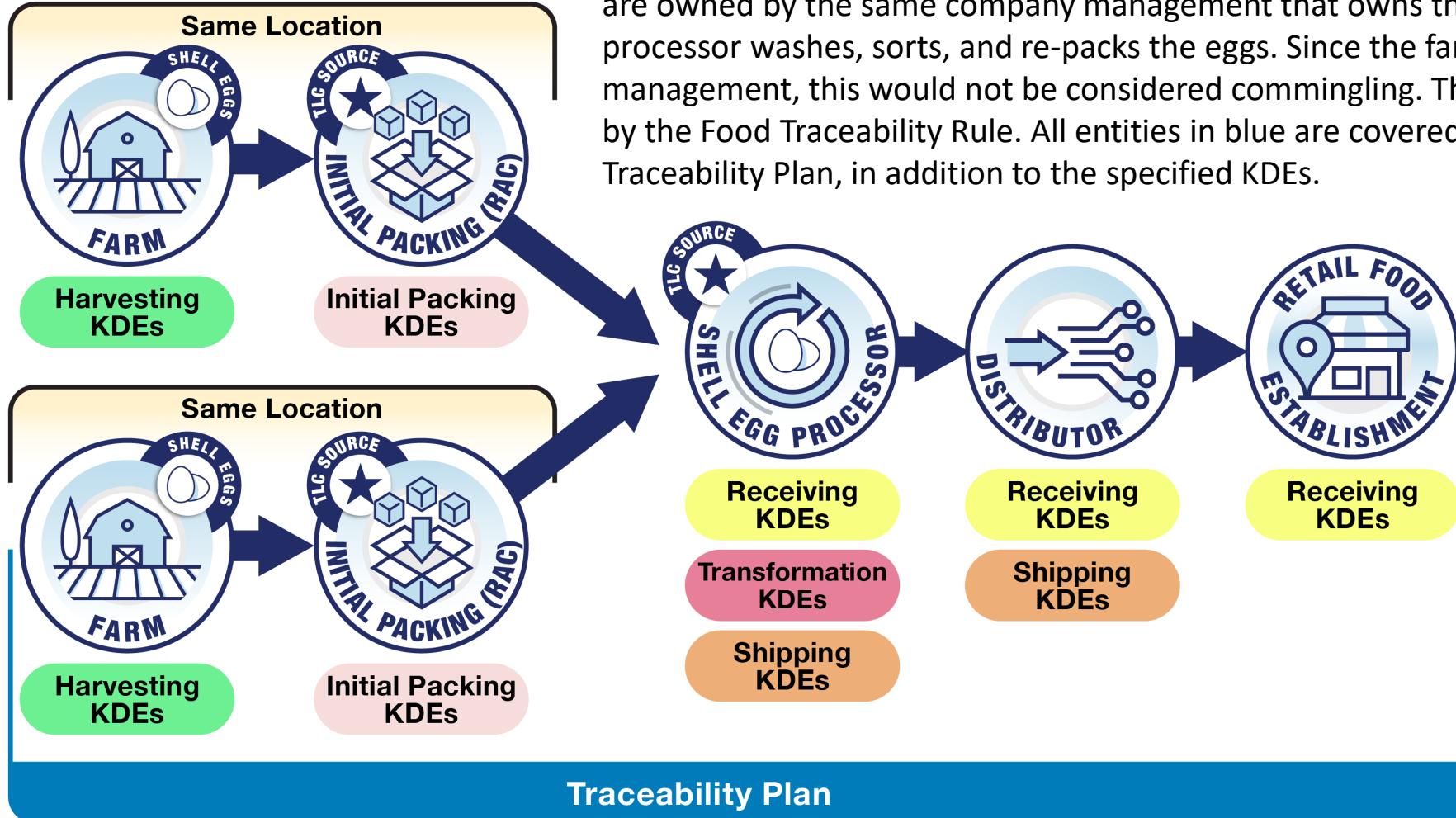


In this off-line egg production example, eggs are harvested and packed on different farms under different company management, then shipped to a shell-egg processor who washes, sorts, and re-packs the eggs. During the re-packing, the shell-egg processor commingles the eggs from the different farms. The farms all have written agreements with the shell egg processor stating that the eggs will be commingled, as described in [§ 1.1305\(h\)\(2\)](#). Since the entities have written agreements in place, they do not need to maintain KDEs for the eggs. Since the shell egg processor is commingling the eggs, the eggs would be eligible for the exemption in [§ 1.1305\(h\)](#). Any subsequent receivers of the commingled eggs would not be subject to the requirements of the rule. Since [§ 1.1305\(h\)\(2\)](#) is only a partial exemption, all entities that have written agreements in place must also maintain a traceability plan.

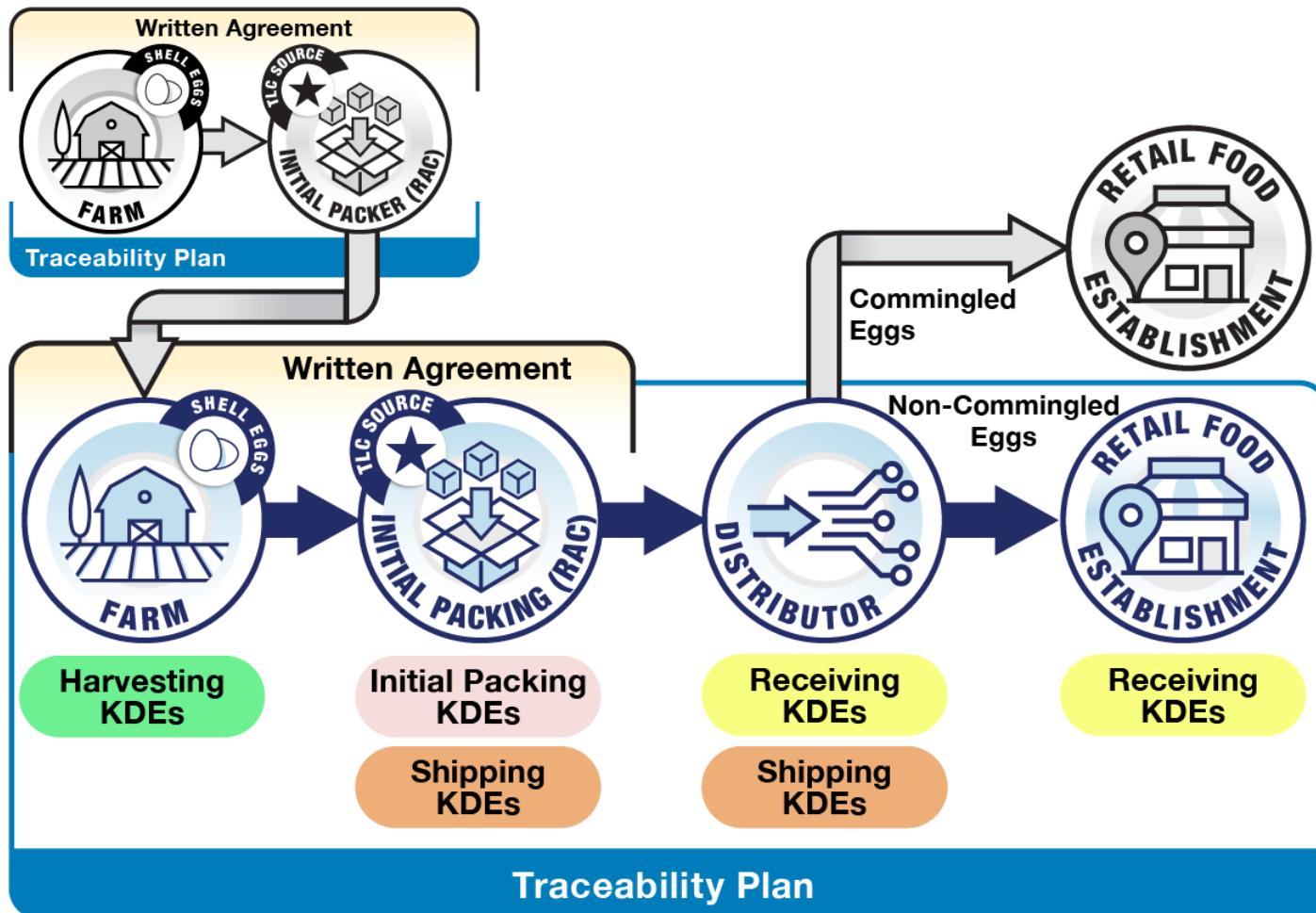
Note that the exempt entities who handle the commingled eggs are not required to keep any traceability records for the eggs, EXCEPT THAT under [§ 1.1305\(h\)\(3\)](#), if they are required to register as a food facility, they must maintain records (for 2 years) identifying the immediate previous source and the immediate subsequent recipient of the food in accordance with [§§ 1.337](#) and [1.345](#).

Supply Chain Example: Off-line shell egg production

In this off-line egg production example, eggs are harvested and packed on different farms that are owned by the same company management that owns the shell egg processor. The shell-egg processor washes, sorts, and re-packs the eggs. Since the farms are under the same company management, this would not be considered commingling. Therefore, the eggs would be covered by the Food Traceability Rule. All entities in blue are covered by the rule and must maintain a Traceability Plan, in addition to the specified KDEs.



Supply Chain Example: In-line shell egg production operation that also receives eggs from a contract farm

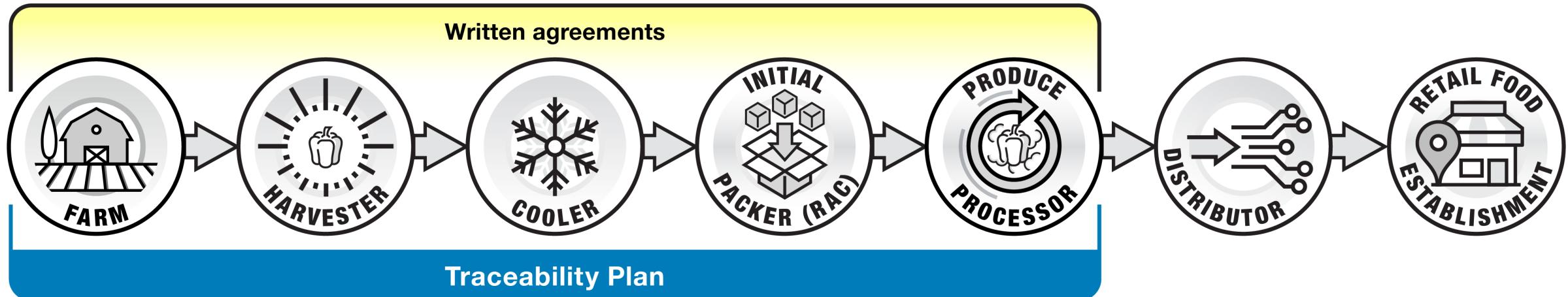


In this example, the farm is an in-line shell egg operation whose eggs are packed at the location where they are laid (in blue). The farm washes, sorts, and packs its own eggs to be sold under the farm's brand. The farm also commingles some of its eggs with eggs from a contract farm (in grey). There are written agreements in place stating that the eggs from the contract farm will be commingled, as described in [§ 1.1305\(h\)\(2\)](#). The farm must maintain KDEs for its non-commingled eggs but does not have to maintain KDEs for the commingled eggs. The eggs are then sent to a distributor for distribution to retail. The distributor and retailers must maintain KDEs for the non-commingled eggs but do not have to maintain KDEs for the commingled eggs. See [this tool](#) for the KDEs required for each CTE. See previous supply chain example for details about the partial exemption for commingled eggs.

Supply Chain Example: Frozen bell peppers

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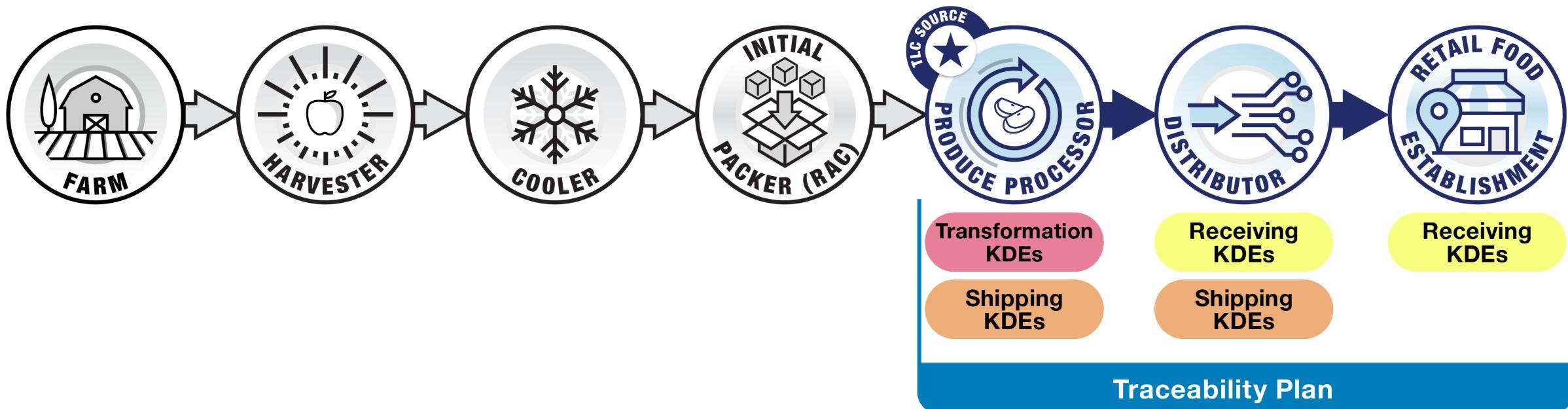
In this scenario, the produce processor is making frozen bell peppers. Written agreements are in place to establish that the peppers will be frozen, as described in [§ 1.1305\(d\)\(6\)](#). The entities with written agreements in place do not need to maintain KDEs for the peppers. Furthermore, since frozen peppers are not on the Food Traceability List, any subsequent receivers of the frozen peppers would not be subject to the requirements of the rule. Since [§ 1.1305\(d\)\(6\)](#) is only a partial exemption, all entities that have written agreements in place must also maintain a Traceability Plan.



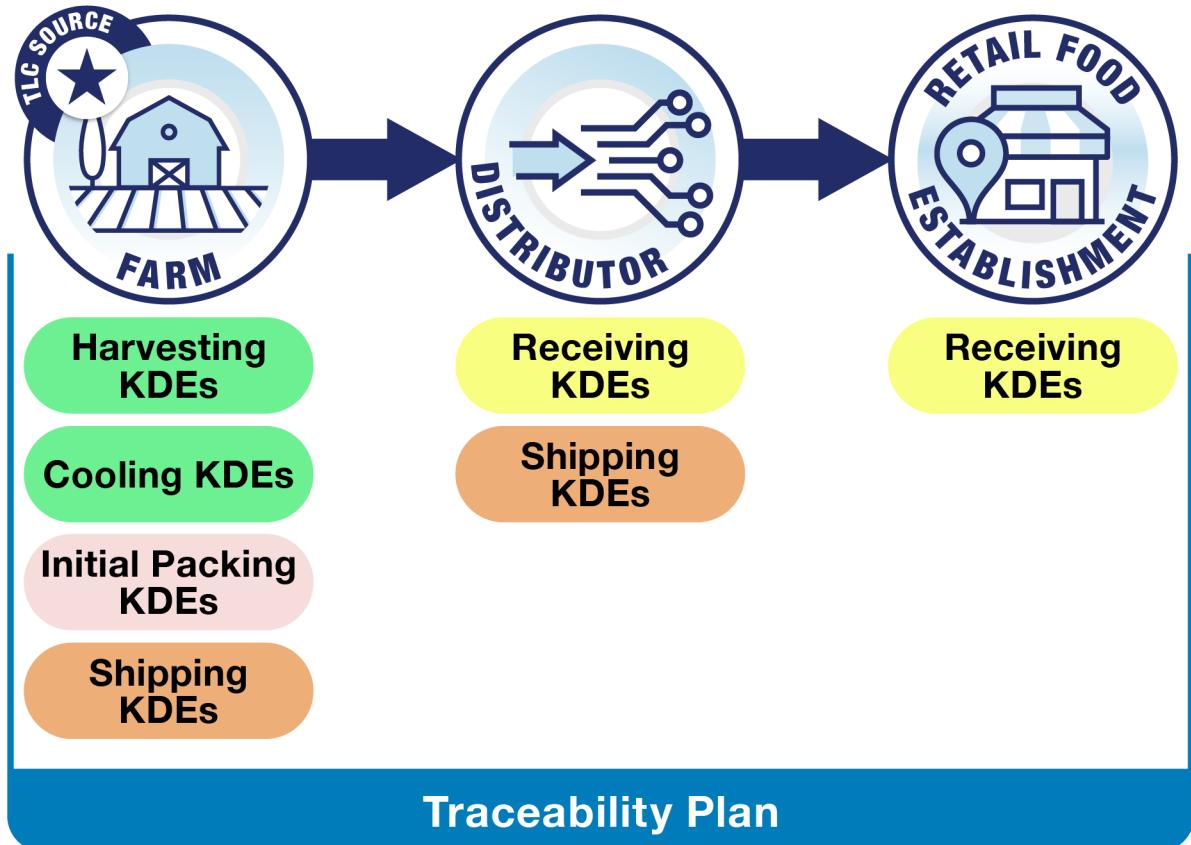
Supply Chain Example: Fresh-cut apples

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In this scenario, the produce processor is making fresh-cut apples. Apples are not on the FTL, so no Key Data Elements (KDEs) are required for the fresh apples until they are fresh-cut. The produce processor must maintain transformation KDEs for the fresh-cut apples under [§ 1.1350\(a\)\(2\)](#), as well as shipping KDEs. The subsequent receivers of the fresh-cut apples must also maintain KDEs as identified in the graphic. All entities in blue are covered by the final rule and must maintain a Traceability Plan, in addition to the specified KDEs. See [this tool](#) for the KDEs required for each CTE.



Supply Chain Example: Fresh cucumbers harvested, cooled, packed and shipped by the farm

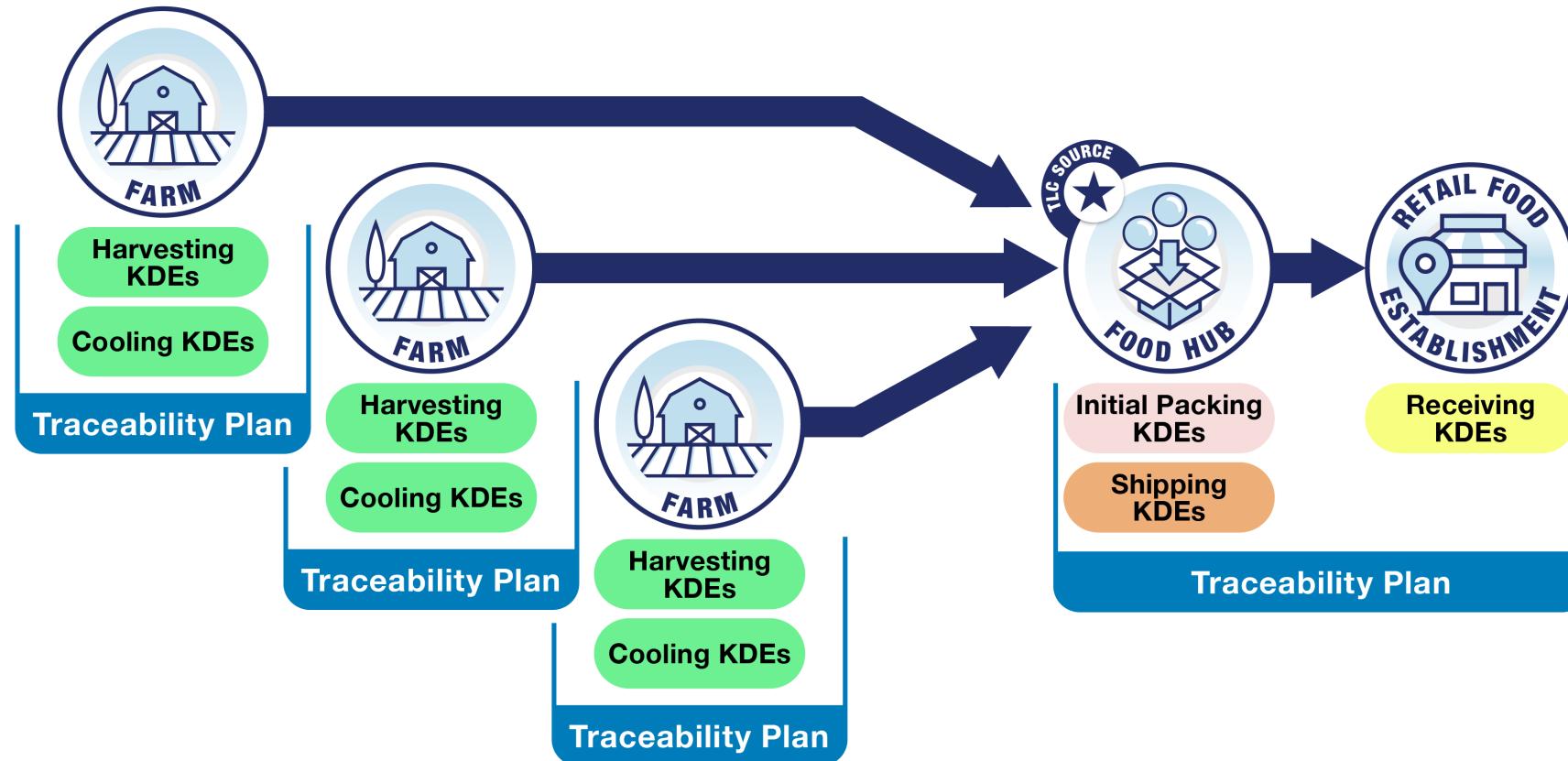


In this scenario, the farm/packer grows, harvests, cools, initially packs and ships the fresh cucumbers. So the farm must maintain KDEs related to those activities. Since the farm/packer is initially packing the cucumber, the farm must also assign a Traceability Lot Code to the cucumbers and is the Traceability Lot Code Source. The subsequent receivers of the cucumbers must also maintain KDEs as identified in the graphic. All entities in blue are covered by the final rule and must maintain a Traceability Plan, in addition to the specified KDEs. See [this tool](#) for the KDEs required for each CTE.

Supply Chain Example: Fresh melons sent to a food hub

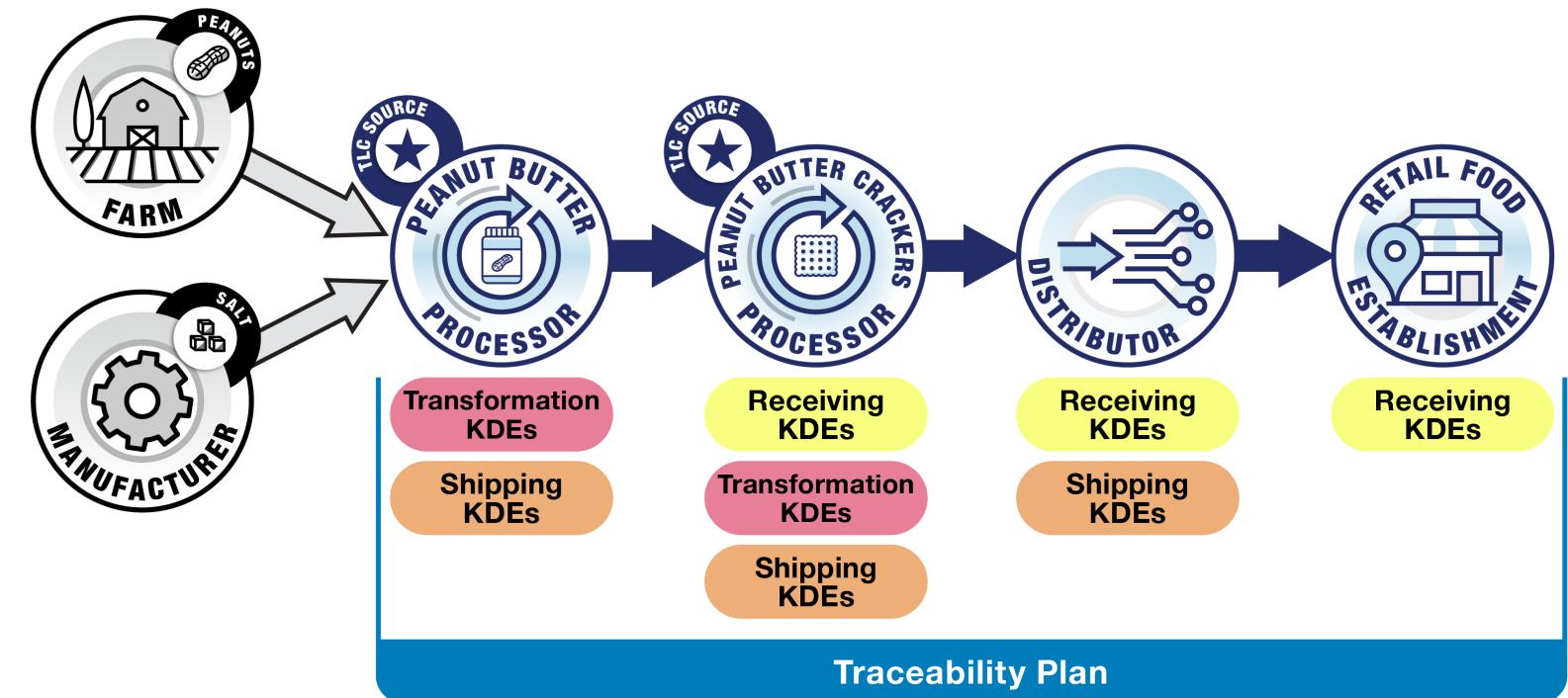


In this scenario, several small farms grow, harvest and cool melons before sending them (not yet packed) to a food hub. The food hub aggregates the melons from the multiple farms, packs them, and assigns a Traceability Lot Code to the melons. The food hub then sends them to a grocery store in the area. KDEs are required for the fresh melons at the points indicated in the graphic. All entities in blue are covered by the final rule and must maintain a Traceability Plan, in addition to the specified KDEs. See [this tool](#) for the KDEs required for each CTE.



Supply Chain Example: Peanut Butter Crackers

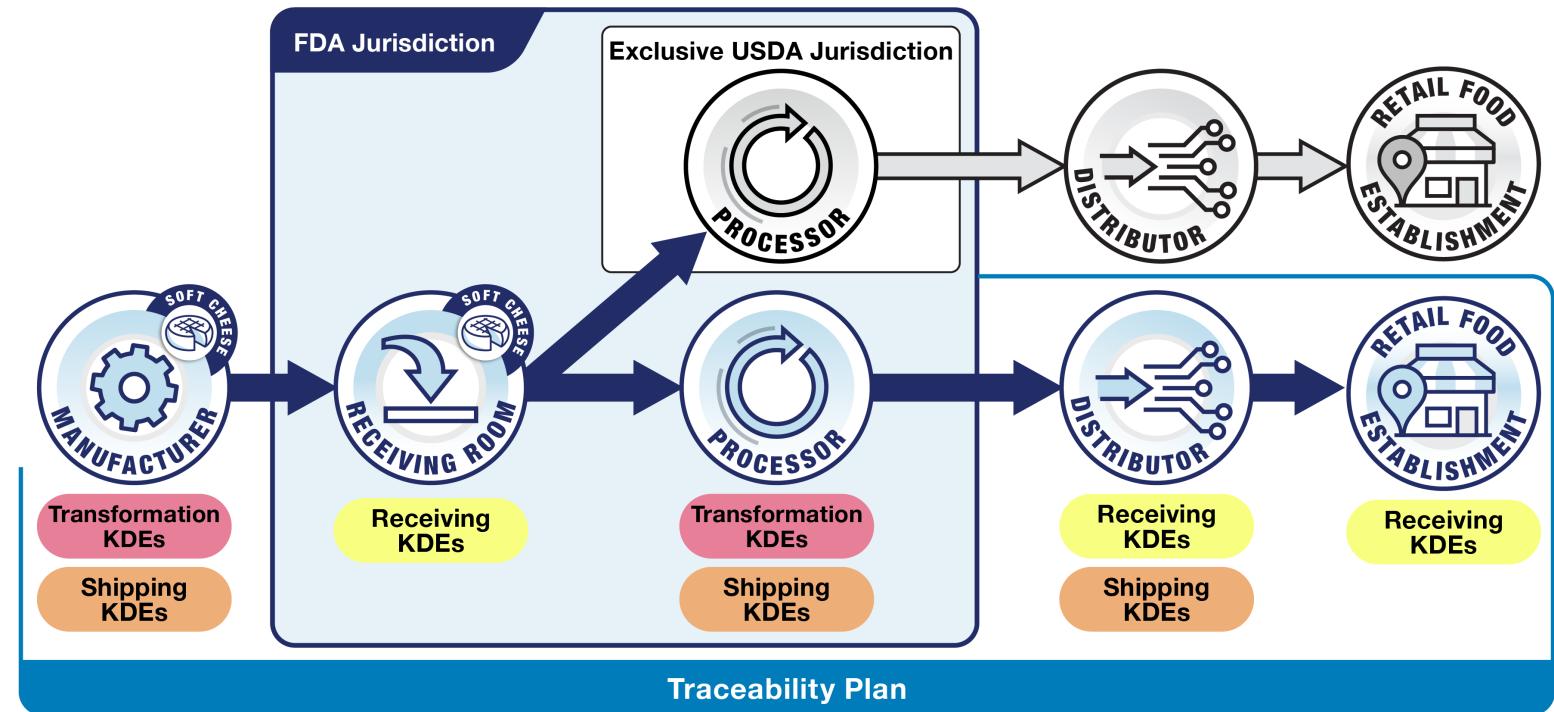
In this scenario, a peanut butter processor is making peanut butter, and a food manufacturer is making peanut butter crackers. No kill step is applied to the peanut butter or to the peanut butter crackers. Peanuts and salt are not on the FTL, so no KDEs are required for those ingredients. The peanut butter processor is using those ingredients to make peanut butter, so they must maintain transformation KDEs for the peanut butter as outlined in [§ 1.1350\(a\)\(2\)](#), as well as shipping KDEs. The peanut butter cracker manufacturer must maintain receiving KDEs for the peanut butter, and transformation and shipping KDEs for the peanut butter crackers they are making. The subsequent receivers of the crackers must also maintain KDEs as identified in the graphic. All entities in blue are covered by the final rule and must maintain a Traceability Plan, in addition to the specified KDEs. See [this tool](#) for the KDEs required for each CTE.



Supply Chain Example: FTL food used in a dual jurisdiction plant



In this scenario, a dual jurisdiction facility is receiving soft cheese from its supplier. The facility has one receiving room (not under exclusive USDA jurisdiction) for all of the facility's incoming ingredients. They therefore must maintain receiving KDEs for all the soft cheese they receive. The FDA-regulated part of the facility is making a fruit and cheese plate, so they must maintain transformation KDEs as well as shipping KDEs. The part of the facility that is under exclusive USDA jurisdiction is making a meat and cheese plate. Under [§ 1.1305\(g\)](#), an exemption applies during and after the time when the food is within the exclusive jurisdiction of the USDA. Therefore, no records are required for the meat and cheese plate. All entities in blue are covered by the final rule and must maintain a Traceability Plan, in addition to the specified KDEs. See [this tool](#) for the KDEs required for each CTE.





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