

Traceability Plan Example for Food Processor (§ 1.1315)

The purpose of this document is to help businesses establish a traceability plan as required in § 1.1315 of the Food Traceability Rule.

This example includes the information that is required by the Food Traceability Rule and is one example of how a traceability plan can be established. There is no specific format required for the traceability plan, but the information in the traceability plan must meet the requirements as described in § 1.1315 of the Food Traceability Rule and reflect the current practices specific to the covered entity.

Requirements under § 1.1315 of the Food Traceability Rule:

If you are subject to the requirements of the rule, you must establish and maintain a traceability plan containing the following information:

1. A description of the procedures you use to maintain the records you are required to keep under this rule, including the format and location of these records.
2. A description of the procedures you use to identify foods on the Food Traceability List that you manufacture, process, pack, or hold;
3. A description of how you assign traceability lot codes to foods on the Food Traceability List, if applicable;
4. A statement identifying a point of contact for questions regarding your traceability plan and records; and
5. If you grow or raise a food on the Food Traceability List (other than eggs), a farm map showing the areas in which you grow or raise such foods.
 - Except for aquaculture farms, the farm map must show the location and name of each field (or other growing area) in which you grow a food on the Food Traceability List, including geographic coordinates and any other information needed to identify the location of each field or growing area.
 - For aquaculture farms, the farm map instead must show the location and name of each container (e.g., pond, pool, tank, cage) in which you raise seafood on the Food Traceability List, including geographic coordinates and any other information needed to identify the location of each container.
6. You must update your traceability plan as needed to ensure that the information provided reflects your current practices and to ensure that you are in compliance with the requirements of the Food Traceability Rule. You must retain your previous traceability plan for 2 years after you update the plan.

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Business Name: RS Foods	ISSUE DATE	01/15/2028
Address: 7832 Main Avenue, Minneapolis, MN 55405	SUPERSEDES	01/20/2026

Procedures to Maintain the Records

Hypothetical Solution is the software solution we utilize to send and receive EDI messages containing shipping and receiving KDEs with our supply chain partners. We receive Advanced Shipping Notices (ASNs) from our suppliers (via Hypothetical Solution) for each shipment with FTL foods. These ASNs contain our required receiving KDEs, except for receipt date, which is automatically recorded by the system when the incoming shipment is marked as received at the loading dock. We also use Hypothetical Solution to send ASNs to our customers for FTL foods that we ship. These ASNs contain the required shipping KDEs, which the system maintains as well as sends. Hypothetical Solution stores all transactions for more than 2 years in accordance with other company recordkeeping policies. Hypothetical Solution is a 3rd-party, cloud-based software solution that stores, receives, and sends EDI transactions digitally.

When we receive an ASN of an inbound shipment, the anticipated shipment is created in Pretend Tool, our central software tool for ordering and production. Receiving inbound shipments, work orders for producing foods, and picking outbound shipments are all recorded in Pretend Tool as digital records. These records also contain all of the required Transformation KDEs. The software is installed in servers that are located on site at RS Foods. Records are kept for more than 2 years in accordance with company recordkeeping policies.

Procedures to Identify FTL Foods

Every food that RS Foods receives, produces, and ships is given a SKU in Pretend Tool. Without a SKU number, an inventory transaction cannot be recorded for a food in Pretend Tool. Each SKU has attributes describing which food it represents inside Pretend Tool. One of these attributes is a checkbox/flag that says whether the food represented by the SKU is on the FTL or not. Foods that are on the FTL or that contain FTL ingredients (in the same form in which they appear on the FTL, e.g., “fresh”) are flagged with this checkbox. When a new product is added to our inventory, we associate it with a SKU in Pretend Tool and evaluate whether to flag it as on the FTL. We review the total list of SKUs in Pretend Tool on a quarterly basis.

Assigning Traceability Lot Codes

Traceability lot codes are assigned for foods we produce using a combination of the production date, two-digit facility number, and SKU: MM/DD/YYYY/facility number/SKU. For example, 03152026056AA13426 would be a production run of SKU AA13426 on March 15, 2026 in facility 56. Facility 56 is the number given to the Minneapolis location of RS Foods.

If an FTL food is received without a lot number (e.g., from an exempt supplier), we assign a TLC using a combination of the receive date, the Bill of Lading number and SKU. For example: 0315202651378230B61342 is a product with a SKU of BB61342 received on March 15, 2026 with BOL #51378230.

Point of Contact

Jackie Taylor, QA manager, 222-453-8877

Traceability Plan Updates

This plan is reviewed annually as part of our management review of our food safety system, as well as whenever something changes in our traceability procedures. Each previous traceability plan is kept in a folder in the Pretend Tool for at least two years after it is updated.