

## Participants Sought for Product Tracing Study

**What:** The Institute of Food Technologists, working under contract with FDA, is conducting product tracing pilots for produce and processed foods

- Produce item: tomatoes
- Processed food: Asian style RTE or non-RTE (including frozen) dish containing chicken, peanut products, and spices, examples of which could include Pad Thai or Kung Pao.

**When:** Food industry supply chain partners who will participate in the pilots need to be secured by November 30. Data collection and the mock traceback tests will be conducted in the first quarter of 2012. IFT must provide FDA with the final report by June 6, 2012.

**Who:** Many supply chain partners, spanning raw material providers/growers through all points in the supply chain through to retail and foodservice. This may include: transporters, brokers, foreign suppliers, etc. The pilots are not limited to those required to keep records under the Bioterrorism Act of 2002. **IFT is currently seeking volunteers for these pilots.** Interested companies should engage their supply chain partners. IFT will provide all interested firms with additional information, including a more detailed timeline, and will answer any questions companies may have regarding participation. It is important to construct complete supply chains (i.e., a string of trading partners through whom product flows). IFT will work to include as many interested companies as possible who handle the aforementioned products (and in the case of the processed food, the spices or peanut ingredients that will be traced).

The two pilots will be run separately, but concurrently. The approach, execution, and analysis of the results/findings will be developed primarily by panels (one for produce and one for processed foods) consisting primarily of pilot participants, select trade association representatives, and other stakeholders. These panels have not yet been assembled. All food companies participating in the pilot studies will be invited to be represented on the respective panel, however, panel participation is not mandatory. Those choosing to participate in the panels will need to commit more time to this project than companies who participate in only the studies. The panels will have at least one face-to-face meeting and many conference calls/web meetings over the course of three months. Some panelists will be asked to participate in a final meeting in April 2012.

At this time, IFT is not actively seeking participants from the 3<sup>rd</sup> party technology community. The request for this type of participant will be issued in early December, 2011, along with a list of the criteria by which interested technology companies will be evaluated and an explanation of the process for selecting these types of participants.

**How:** IFT is currently working with a group of state and federal traceback investigators to develop a baseline study, evaluating historical investigations to determine aspects of product tracing that tend to help or hinder an investigation.

IFT's task, which includes the pilots as well as additional work, will be conducted by several panels working collaboratively, including the traceback investigator panel, the produce panel, the processed food panel, the cost panel, and an oversight panel. The oversight panel consists of seven individuals: Jack Guzewich, Tom Breuer, Caroline Smith DeWaal, Benjamin Miller, Douglas Bailey, Brenda Lloyd and Bruce Welt. These individuals have already helped collect and analyze input into how the task should be conducted. The "produce" and "processed" panels, led by IFT, will determine the exact specifications for the pilot tests. The proposed approach is as follows:

Between now and early December, shortly after participants have been selected, IFT will spend at least one hour with each participant to understand their operation. We would love to conduct some "field trips". Each participant will be asked questions regarding data collection, capture, and sharing, how internal and external traceability are managed, and other records-related questions, as well as about the product of interest (rough estimates of batch sizes, # distribution units/batch, "shelf life" and expected flow through the supply chain, etc.).

Based on some of the issues identified in the baseline study, and some work being done independently to specify Critical Tracking Events and Key Data Elements, IFT will divide participants into at least two groups based on their reported recordkeeping practices: those that seem to follow practices that would facilitate product tracing, and those where improvements could have the maximum impact. Within the "improvement" group, depending on the nature and extent of areas for improvement, and in consultation with the panels, IFT may request volunteers to make minor changes to their recordkeeping or other practices in order to test hypotheses regarding the factors that improve product tracing. Due to time and budget constraints, it is expected that modifications requested will be reasonable, and the panel will help determine the best approaches to conduct the tests.

Firms will be asked to collect data (in many cases, this will be in a similar fashion to current practices) over a finite period (likely a few weeks, depending on the product/ingredient), and provide these records to IFT for analysis by IFT, FDA, and the panel during the test demonstrations. Hypothetical outbreak scenarios will be developed by the panel and traceback investigators. A mock traceback will first be conducted in a manual fashion (analyzing and sorting records essentially "by hand" to establish links between ingredients and finished products, and between supply chain partners). In this stage we will seek to identify the data attributes and other industry practices that enable or prevent linking of supply chain data. In a second stage, the information will be analyzed using one or more collaboration platforms. Again, these have not yet been selected, and a separate notice will be issued in December 2011.

## **Important Considerations**

FDA has indicated that firms participating in the study will *not* be subject to enforcement action as a result of the information provided. This study does not seek to point a finger at any particular firm or industry for deficiencies in record keeping. Rather, IFT and the panels will look for themes—processes or practices employed by various firms—that contribute to the ability to trace products. Ultimately we seek to identify ways to improve the speed and accuracy of product tracing, and quantify the cost and benefits associated with these improvements.

IFT will *not* remove any company-identifying information from materials supplied by companies in connection with the study. The FDA will redact any documents or data that are to be made public in keeping with the applicable laws and regulations governing disclosure.

### **Why Participate?**

The results of these pilots will form the basis of FDA's report to Congress, due July 2012. While participants will not be permitted to discuss the results of the study (including the data that are collected, the firms participating, the scenarios applied in the tests, etc.) and the recommendations put forward as a result of the work, they will certainly have first hand insight into the process and will be key to the process itself. Participation also provides an opportunity to better understand how a company may improve its current operations, and for some, perhaps showcase their current systems. IFT understands the perceived risk associated with participating. However, with or without *your* company's participation, the pilots will be conducted. We hope firms will see the benefit of proactive participation.

### **For more information**

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