

United States Proposed Food Traceability Rule

Good afternoon. I'm Bryan Hitchcock speaking on behalf of the Institute of Food Technologists (IFT).

IFT, founded in 1939, is a non-profit, scientific individual member institute whose mission is to advance the science of food and its applications across the global food system, to ensure sustainable, safe, and nutritious food for all.

IFT appreciates the opportunity to provide input on the Requirements for Additional Traceability Records for Certain Foods, known informally as the Food Traceability Rule.

In 2011, IFT performed traceability pilots at the request of FDA as described in FSMA Section 204(a), producing a report with recommendations for the devising of this rule. Within the report, the Key Data Element and Critical Tracking Event constructs along with globally unique lot-based identification are identified as foundational to effective traceability systems. These concepts help underpin interoperable standards for achieving food safety and scaling up adoption.

Global, precompetitive public-private partnerships are key to productive collaborations driving voluntary standards, coordinating pilots, standardizing KDEs/CTEs, creating best practices, and facilitating communication and engagement. IFT's leadership with the Global Dialogue for Seafood Traceability with over 70 seafood industry organizations exemplifies their success in furthering traceability.

In driving enhanced traceability upstream towards production, small scale producers and processors have financial, personnel, and/or technological constraints. IFT strongly encourages FDA to create capacity building initiatives for enabling data collection capabilities for these stakeholders, in the US and globally. Coaching them through evaluation and implementation will be pivotal to implementing the rule. Additionally, FDA should continue its leadership role in addressing questions about data management, privacy, and transparency as traceability becomes more digitized.

End-to-end traceability will become common to all food products in the near future and will be necessary for addressing yet unanticipated recall scenarios. IFT anticipates the rule as the basis for regulatory harmonization across the global food system.

Education and training on utilizing digital technologies will be immensely important, as they may require new skills. We highly encourage that education and training be given careful consideration.

IFT, with its Global Food Traceability Center, has a long history of active engagement in food safety and traceability in partnership with the FDA, non-profits and the private sector including undertaking task orders, conducting primary research, leading pre-competitive industry platforms, creating implementation tools, and delivering educational programming.

IFT looks forward to participating in this exciting new journey and stands ready to partner with the FDA and private enterprise in implementing the Food Traceability Rule. Consumers are counting on all of us to give them great tasting, nutritious, and most importantly, safe food. Thank you.