Tomatoes and tomato-based products arrive at your local grocery store for sale. Grocers are responsible for receiving thousands of KDEs from each stage of the supply chain.

Both domestic and international farmers must provide detailed maps of each field, growing area or pond, including geographic coordinates and field name.

Tomatoes are harvested, cooled, and packed with KDEs tracked at each stage. Tomatoes not sent directly to retail are processed for use in other products with their own new KDEs.

Wholesalers and distributors store and transport tomatoes and tomato products to the grocery store. Distributors are responsible for capturing KDEs for every product on the list at both receiving and shipping. This requires maintaining individual records for shipments to potentially hundreds of different store locations.

Distributors will often use tomatoes to prepare other products, like fresh, ready-to-eat foods, which makes the KDE web even more complex.

Some grocers create ready-to-eat foods at a “central kitchen” for distribution to other retail locations, restaurants, or other foodservice retailers, requiring even more KDEs.

In some cases, grocers may ship products prepared in-store to other store locations, restaurants or convenience stores.

Each new product must be linked to a new traceability lot code and requires the tracking of new KDEs for transformation as well as the original KDEs from the ingredients covered under the rule.

Business models are rapidly changing, and any regulatory framework should provide flexibility to adapt with business practices. FDA’s Food Traceability Rule inhibits progress by:

- Creating an unnecessary paperwork burden that diverts resources from the primary focus of preventing foodborne illness.
- Requiring a level of detail and tracking not achievable or valuable with current technology.
- Imposing unreasonable obligations on small and medium size businesses and farms who are least able to absorb additional costs.
- Creating administrative costs that will significantly increase already elevated food prices for shoppers without a demonstrated public health benefit.

The U.S. Food and Drug Administration (FDA) issued a highly complex Food Traceability Rule 11 years after passage of the Food Safety Modernization Act. This law was originally designed by Congress to quickly identify and mitigate risk associated with a small number of “high risk” foods more prone to contamination, such as sprouts. However, when the rule was published, the scope expanded dramatically to include a lengthy list of foods impacting well above 10,000 products. The sheer complexity of FDA’s mandates puts an unnecessary paperwork burden on an already stressed food supply chain without any focus on prevention— which should be the core of FDA’s mission.