

FMI Traceability Plan Template

Background

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

The traceability plan does not need to follow any specific format, but the information within the traceability plan must meet the requirements described in section §1.1315 of the Food Traceability Rule and reflect the current practices of your operation.

Requirements under § 1.1315 of the Food Traceability Rule:

If you are subject to the requirements of the final 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.
 - 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 rule. You must retain your previous traceability plan for 2 years after you update the plan.

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Essential Elements of a Traceability Plan

Description of Facility¹

What does the facility do? Manufacture, process, pack, hold, retail, restaurant.

Procedures to Maintain Records

Digital records with captured Key Data Elements (KDEs) are maintained in the [internal/external] system.

Records can be accessed at the following location(s):

- ☐ Corporate office
- ☐ Food processing facility (inspected establishment)
- ☐ Store
- ☐ Third party [list name]
- ☐ Previous supplier
- ☐ Wholesaler
- ☐ Contract vendor (specify product and company)
- ☐ Online or cloud storage
- ☐ Other: _____

Records are maintained for two years.

Notes:

- Describe how records are stored, including the format and location of these records.
- One company might have multiple types of storage for records. Record types could vary depending on the CTE, facility type, process, food, and/or vendor.
- Records may be maintained by another entity but must be accessible within 24 hours.

Procedures to Identify Foods on the Food Traceability List (FTL)

Procedures to identify foods on the FTL – receiving

All suppliers are obligated by contract to identify FTL foods prior to shipping.

Identification of FTL foods by suppliers is provided via:

- ☐ Master Data *Suppliers are required to update master data when changes are made.*
- ☐ Supplier Portal
- ☐ Label (Pallet tags and/or Product as a secondary method)

Suppliers provide shipping KDEs for each item on the FTL at the time of shipping via Advanced Shipping Notice (ASN).

¹ Description of facility is not a requirement of the rule but may be helpful to include.

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Procedures to identify foods on the FTL – transformation with subsequent shipping (if applicable)

Products and processes within the facility are evaluated to identify FTL foods that are transformed and will be subsequently shipped to another facility. Foods are identified as an FTL item within the [master data system].

Notes:

- Describe how foods on the FTL are identified.
- Receivers of FTL foods must have a procedure for knowing whether a particular food they receive is on the FTL.
- FMI recommends contract language with suppliers to identify foods on the FTL and to provide records at the time of receiving.
- May want to consider including supplier communications or link to information
- Recommend requirements for vendors and/or suppliers of foods on the food traceability list to share KDEs at time of shipping on their end so that information is received prior to receiving the FTL food.

Assigning Traceability Lot Codes

_____ We do not assign TLCs.

_____ Lot codes are assigned according to company policy.

[insert link to company policy]

[insert link to document that explains the TLC]

Notes:

- TLCs can only be assigned when:
 - A raw agricultural commodity is initially packed;
 - performing the first land-based receiving of a food obtained from a fishing vessel; **or**
 - transforming an FTL food.
- Assignment of TLCs during Transformation
 - When an entity, such as a central kitchen, transforms a food into a FTL food and subsequently ships the FTL food to another entity (e.g., retail store), a new TLC needs to be assigned.
 - Assignment of TLCs is not required when food that is transformed is sold directly to consumers.

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Point of Contact

Name and/or job title:

Department:

Email:

Phone:

Notes:

- Provide a point of contact for questions regarding the traceability plan and records, including name and/or job title and phone number.
- Point of contact is the individual familiar with the firm's procedures for traceability and who is authorized to speak to FDA.
- As a backup, facilities may consider designating another person and/or job title and provide a general email address for the department responsible for traceability.

Farm map (if applicable)

Location of field/container where FTL food is grown/raised

Name of field/container where FTL food is grown/raised

Geographic coordinates where FTL food is grown/raised

See Appendix – Note: For most does apply. Required if you grow or raise food on FTL, other than eggs

Traceability Plan Updates

The plan is located [insert where stored]. This plan is reviewed at least [insert when] as part of our management review of our food safety program and whenever changes are made to our traceability procedures. . The plan is located [insert where stored]. Previous traceability plans are located [insert where stored] and are maintained for at least two years after updating and are identified by version number.

Notes:

- The plan should be updated as needed to ensure it accurately reflects current practices and compliance with the rule.
- Any outdated plans need to be maintained for at least two years following the plan update.

Traceability Plan Changelog			
Revision Date	Change Description	New Version #	Previous Version #

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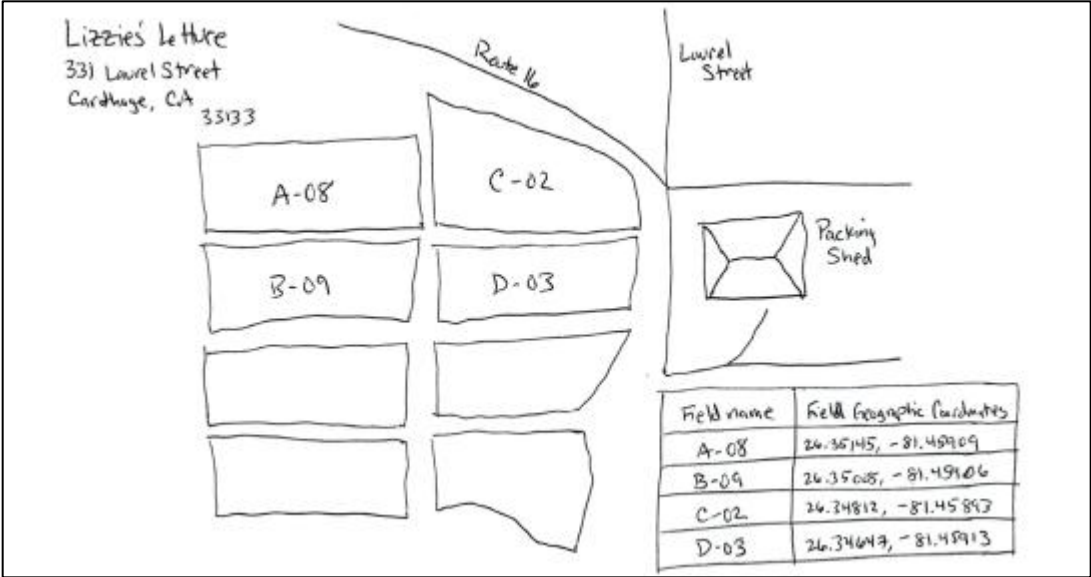
Appendix

Farm Map Example #1

Farm Name	Field Name	Field Geographic Coordinates



Farm Map Example #2



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FAQs and Additional Resources

FAQs

1. When will FDA request records?

FDA can request records and to view a company's traceability plan during a routine inspection or when initiating a traceback investigation. The requirement that the records be provided in an electronic, sortable spreadsheet is only triggered when it is necessary to support FDA's efforts to prevent or mitigate a foodborne illness outbreak, assist in the implementation of a recall, or to otherwise address a threat to the public health.

Additional Resources

- [GS1US Guideline: Retail Grocery and Foodservice Application of GS1 System of Standards to Support FSMA 204](#)
- [FMI Compliance Guide for the Traceability Rule](#)
- [FMI Traceability Implementation Guide](#)
- **FDA Traceability Plan Examples**
 - [Restaurant Example](#)
 - [Farm Example](#)
 - [Sprouter Example](#)