

AMY'S FOOD SAFETY SPOTLIGHT

January 2025



UPCOMING SERVSAFE® CLASSES

January 7th – Louisville
January 21st – Louisville
February 10th - Louisville
February 25th – Louisville

UPCOMING EVENTS:

2025 Restaurateurs Gala
Monday January 27th, 2025, at
Savor at River House

For more information and
registration visit kyra.org and
click on the “Events” tab.

FOOD TRACEABILITY

Happy New Year! Welcome **2025!** Another year just seemed to fly by!

I'm going to start the year out talking about Food Traceability. The FDA outlined in the Food Safety Modernization Act (FSMA) of 2011 requirements for additional traceability records for certain foods. A final rule was published in 2022 under section 204 of the FSMA and compliance with this new rule must be achieved by January 20, 2026. Food traceability is the ability to track food through the entire supply chain until it reaches a consumer. The reason for the rule is to target hazards posing significant risks to public health. With better traceability data, the FDA can more effectively identify which food(s) may be causing illness, resulting in less marketplace confusion, harm and waste, tracking and remove contaminated food from the marketplace to minimize consumer illness or death, improve foodborne illness prevention strategies, create a uniform set of requirements to track food items, and reduce coordination challenges between different types of food businesses and regulators. Who has to follow the traceability rule? Companies that manufacture, process, pack, or hold foods on the Food Traceability List.

FSMA 204 specifically includes the following:

Food Traceability List – The Food Traceability List (FTL) identifies the foods for which additional traceability records are required. The additional recordkeeping requirements apply to the foods specifically listed on the FTL, and to foods that contain listed foods as ingredients, provided that the listed food that is used as an ingredient remains in the same form (e.g., fresh) in which it appears on the list.

Standardized Food Traceability System – A standardized Food Traceability List and Key Data Elements ensure consistent and accurate tracking of designated foods throughout the supply chain.



Enhanced Recordkeeping Requirements – Food facilities are required to maintain detailed records of critical tracking events associated with the designated foods, providing a clear audit trail for regulatory oversight.

Food Traceability Plan – Companies must establish and maintain a traceability plan that describes the procedures they'll use to adhere to new recordkeeping requirements. This includes the assignment and capture of traceability lot codes combined with other identifying data to link shipments of certain foods in our supply chains.

How does this affect restaurants? Beginning in 2026, restaurants that include foods from the "food traceability list" will need to meet specific record keeping requirements.

The Rule requires a restaurant to keep track of these Key Data Elements (KDEs) that you must have linked, recorded, and maintained for FTL foods:

- Traceability Lot Code
- Food quantity and unit measurement
- Previous two distributors/suppliers and locations.
- Restaurant receiving location (e.g. loading dock, receiving area of restaurant)
- Date you received the food
- The name of and location description of the initial supplier/grower that assigned the traceability lot code
- Reference document and reference document number

In most situations, the food shipper will send you most of the above KDEs. Your distributor/supplier may be able to keep and store this KDE information for you, however, you are still responsible for providing access to that information within 24 hours of an FDA official request.

Click on the website below for this and more information regarding the Food Traceability Rule

[FDA's Food Traceability Rule | National Restaurant Association](#)

Click on the website below for the foods on the Food Traceability List

[Food Traceability List | FDA](#)



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