Connect with the FDA to Strengthen Food Safety Through Effective Traceability

The National Grocers Association (NGA) represents 21,000 independent community grocers and wholesalers across the United States. Independent community grocers account for 33 percent of all grocery sales, exceeding $250 billion, and more than 1 million American jobs.

Why does the FDA need to hear from you?

In 2022, the FDA issued a Food Traceability Rule, as required by the Food Safety Modernization Act Section 204, that is complex and virtually impossible to implement in the given 3-year timeframe. It requires the tracking of a large list of foods from the exact spot in the field where ingredients are grown through every single step in the food supply chain until the food is sold to consumers.

Grocers like you can help educate the FDA about the challenges you face while implementing the rule. This education will help the FDA better understand and respond to industry requests for additional time and flexibility to implement the rule correctly.

Connect with the FDA

1. **Do you want to talk to the FDA about how this rule will impact your business and why you need time and flexibility to comply?**

   Fill out this form: https://www.fda.gov/media/142976/download
   Submit the form to: FSMA204Traceability@FDA.HHS.gov

2. **Do you have specific questions about how to the rule applies to a situation in your store?**

   Complete an inquiry with your question through the FDA Food Safety Modernization Act Technical Assistance Network (TAN): https://cfsan.secure.force.com/Inquirypage/

Ask

✦ **Delay implementation until January 1, 2030.**
✦ **Provide flexibility after the completion of public-private pilots.**

Warehouse Management Systems (WMS) Limitations
- Most existing WMS do not have fields for storing lot codes.
- WMS currently generate a new lot code rather than using supplier-provided lot code.
- Upgrading systems to handle new lot codes is expensive, time-consuming, and leaves retailers at the mercy of their technology providers.

Manual Intervention and Human Error
- Alternative manual methods for tracking lot codes are error-prone and labor-intensive.
- Typing lot codes into systems manually increases the likelihood of mistakes.

Supplier Coordination Issues
- Small retailers often lack systems to handle lot codes or connect with other systems.
- Supplier Bills of Lading do not include lot codes.
- Implementing electronic systems for lot codes is costly and requires significant time.

Technology Provider System Upgrade Timelines
- Upgrading or implementing new warehouse and retail management systems can take 2-4 years.
- Document updates (e.g., Bill of Lading) and system synchronization between warehouses and retail establishments add to the timeline.
- There is a lack of standardization currently in the industry and systems do not integrate easily.

Retail Establishment Constraints
- Retail systems currently cannot accept or process lot code information.
- Handling lot codes manually for thousands of products is resource intensive.

Product Transformation Challenges
- Tracking raw material lot codes and assigning new lot codes for finished products is complex for multi-ingredient foods.
- Current lot coding equipment has limitations on the amount of information it can handle.
- Implementing systems for batch sheets, work in process (WIP), and rework tracking is expensive.

Technological Adaptation
- AI technology for reading and inputting lot codes from scanned documents is still unreliable.
- Advanced lot coding equipment and electronic systems for formula management require substantial investment and time to implement.

Hardware Updates
- Retailers may need to purchase hardware to make traceability systems work. Hardware includes scanners, tablets, code dating printers, and other equipment that works with the software updates.