
ASSOCIATION OF FOOD AND DRUG OFFICIALS

2018

RESOLUTION NUMBER 2018-3

Submitted by: AFDO Board

Date: June 6, 2018

Concerning: FDA Traceability Guidance

Whereas, food manufacturers produce products using materials from many different sources that have the potential to reach millions of consumers across the country, and

Whereas, traceability is necessary to ensure the safety of food and prevent foodborne illness, and

Whereas, the Food Safety Modernization Act (FSMA) supports and expands the Bioterrorism Act of 2002 by requiring facilities to establish and implement a food safety system that includes preventive controls and a recall plan, and

Whereas, the food supply chain today is a maze that is global, dynamic and complex in nature and begins at agriculture followed by food processing, storage and distribution, and

Whereas, during the transportation of food products, varied domestic and international regulations and standards are applied, not to mention variable enforcement and inconsistent and sometimes contradictory scientific rationales for such regulations, and

Whereas, while FDA has done a lot of work around traceability as mandated by FSMA, there's been little formal action (or even guidance) as it relates to food traceability since then, and

Whereas, the recent romaine lettuce outbreak has illustrated the importance of good record keeping and traceability, and

Whereas, FDA is required under section 204(d)(2) of FSMA to designate high-risk foods for which additional recordkeeping requirements are appropriate and necessary in order to rapidly and effectively track and trace such foods during a foodborne illness outbreak or other event, therefore be it

Resolved, that AFDO request FDA to provide industry guidance on traceability in order to better control, and minimize risks to companies and consumers, and be it further

Resolved, that this guidance be geared to implementing seamless traceability programs that can provide manufacturers the ability to take quick, comprehensive action at any time should the need to withdraw a product arise.