

# Restaurant Traceability (FSMA 204) Resources

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Kate Piche, Sr. Director Food Safety & Compliance  
Food Safety and Compliance Team

# Agenda

Restaurant  
Traceability  
Resources



- 01. Overview of Food Traceability Rule**
- 02. Key Dates & Deadlines**
- 03. Restaurant Record Keeping Requirements**
- 04. Traceability Resources for Restaurants**
- 05. Questions**



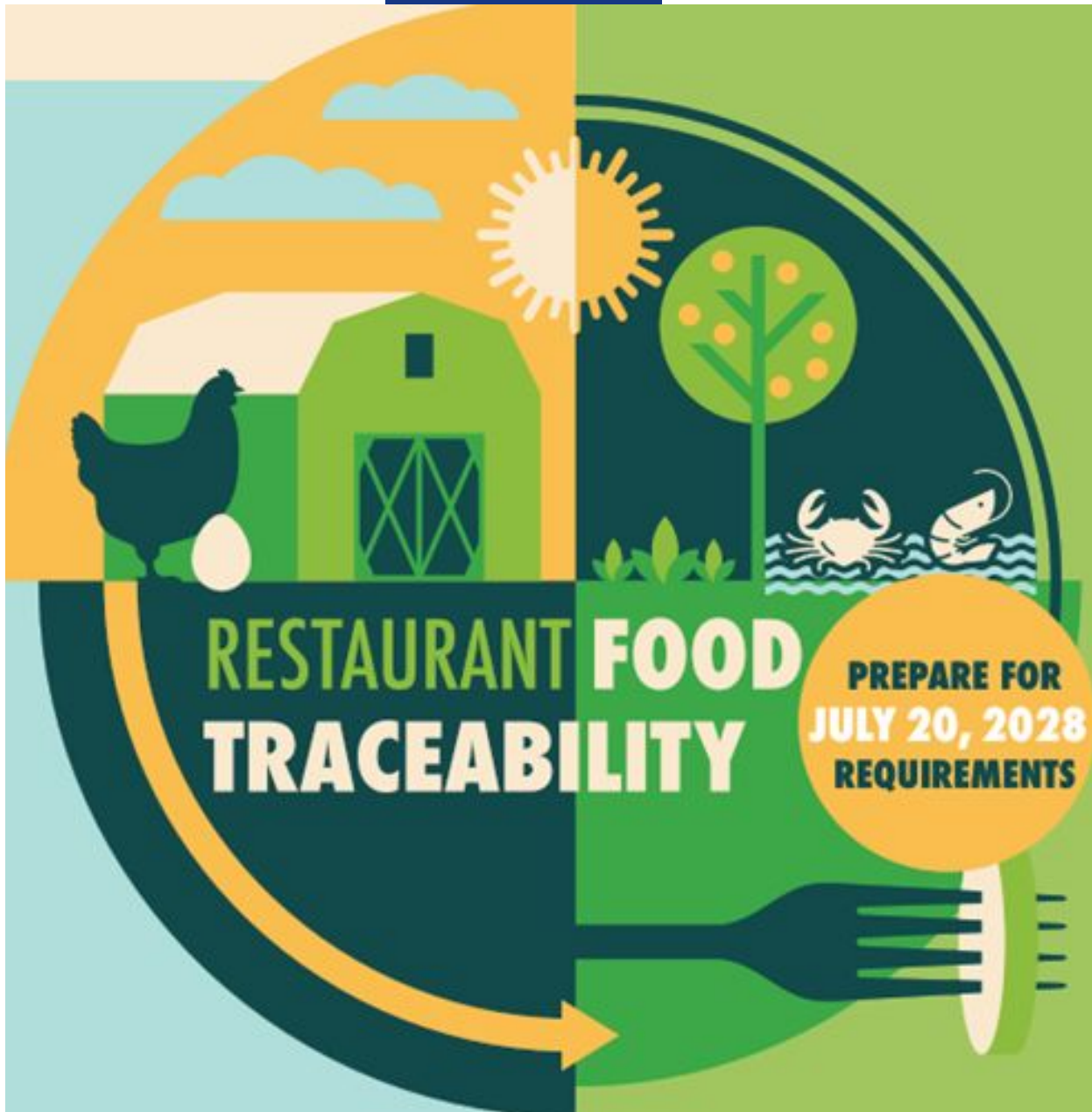
## What is the FDA Food Traceability Rule?

- **Implements Section 204(d) of the Food Safety Modernization Act**
- **Key component of the FDA's New Era of Smarter Food Safety Blueprint**
- **Aims to enhance the traceability of food products throughout the supply chain**



# Goals & Objectives of the Rule

- **Enhanced Traceability for Foods on the Food Traceability List**
- **Rapid Response**
- **Uniform Requirements**
- **Improved Food Safety**



# Key Dates and Deadlines

- **Initial Date/Timeframe:**  
**January 20, 2026**

**Inspections to begin 2027**

- **New Date/Timeframe:**  
**July 20, 2028**

**Inspections to begin 2029?**



# RECORDKEEPING REQUIREMENTS



Records required under the rule must be maintained for **two years** from the date they were created.



Covered entities may enter into agreements with individuals or firms to create and keep the records required by the rule on their behalf.



All records must be made **available within 24 hours** of a request (or a reasonable time to which FDA has agreed)

- Can be made during routine inspection
- May also need to provide coding, glossary, explain abbreviations, how information corresponds



The final rule requires entities to provide records to FDA within 24 hours (or a reasonable time to which FDA has agreed) in an electronic, sortable spreadsheet for specified foods and date ranges when requested by FDA in certain situations

# KEY DATA ELEMENT (KDE) COLLECTION FRAMEWORK



Restaurants must collect and store Restaurant Receiving KDEs for 2 years or confirm their supplier will do so.

Ensure the supplier can:

1. Provide access to required KDEs
2. Confirm prior supply chain members have the necessary information
3. Provide the KDE information to regulators within 24 hours or provide access so the restaurant can do this.

\*The Reference Document Number will change as the FTL Food moves to a different part of the process

## PACKING/COOLING KDEs

- Name & Description of commodity.
- Date harvested.
- Lot code (TLC)
- Location where it was harvested from.
- Location description
- Quantity /Unit of Measurement (UOM)
- Origin of the commodity (who you got the commodity from)
- If cooled: the location of where food was cooled and date of cooling.
- Location where commodities were packed.
- Date shipped.
- Date food received for packing.
- Reference document with unique \*Reference Document Number (Example: Bill of lading.)

## DISTRIBUTOR KDEs

- Lot code (TLC)
- Product description
- Quantity/UOM shipped to restaurant.
- Date received FTL food.
- Receiving area where the distributor received the food
- Original grower/processor (name and phone)
- Previous supplier location
- Reference document and \*Reference Document Number.

## SHIPPER KDEs

- Lot Code (TLC)
- Description of product
- Quantity/UOM
- Shipper location
- Previous location (supplier)
- Restaurant location shipped to
- Date shipped.
- Reference document and \*Reference Document Number.

## PROCESSING (TRANSFORMATION) KDEs

- NEW TLC
- New product description
- Previous Lot Code(s) (TLCs) for every FTL food
- New quantity/UOM
- Place of transformation
- Date of transformation
- Reference Document Type and \*Reference Document Number.

## RESTAURANT RECEIVING KDEs

- Traceability Lot Code
- Ship From Location
- Received Location
- Traceability Lot Code Source
- Product Description
- Quantity and Unit of Measurement
- Date Received the Food
- Reference Document Type and Number



# Key Data Element Framework

## At-A-Glance One page

These are the Key Data Elements the entire supply chain is responsible for.

KDE information must be provided within 24 hours of request.

# RESTAURANT FOOD TRACEABILITY RECORDKEEPING REQUIREMENTS



## TRACEABILITY LOT CODE

Number used to identify the item



## SHIP FROM LOCATION

Description of location where food was shipped from



## RECEIVED LOCATION

Description of location the food was shipped to



## TRACEABILITY LOT CODE SOURCE

The place where the Traceability Lot Code was assigned



## PRODUCT DESCRIPTION

Examples: product name, brand, type of commodity, size, style, species



## QUANTITY AND UNIT OF MEASUREMENT

Number of cases, containers, tanks, weight



## DATE RECEIVED THE FOOD

Date the food was shipped



## REFERENCE DOCUMENT TYPE AND NUMBER

Type of document & number

## Restaurant Recordkeeping Requirements

**These are the Key Data Elements restaurants are responsible for providing within 24 hours of request.**

**This information can be kept/stored for a restaurant by a supplier.**

# From FDA 7/23/2024

## Let's walk through a typical foodborne illness investigation as part of a small jurisdiction

- Locals typically work with State health departments which can work with the CDC
  - FDA's CORE team will then also be monitoring situation
  - FDA told us they intend to work with State and Local HD to ensure good, accurate information is being collected
  - Yes, FDA COULD contact restaurants directly, but they do not anticipate doing so. If they do, they will work with Local HD to help expedite conversation





# Restaurant Traceability Resources

# Restaurant Traceability Flyer

We need your help!



Scan QR Code

Goes right to:

[Restaurant.org/Traceability](https://www.restaurant.org/Traceability)

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## DO YOU SERVE THESE FOODS IN YOUR RESTAURANT?



NATIONAL RESTAURANT ASSOCIATION

ServSafe  
National Restaurant Association

Beginning July 20, 2028 the Food & Drug Administration's (FDA) Food Traceability Rule (Rule) goes into effect. The FDA's food traceability rule aims to quickly track certain high-risk foods through the supply chain to prevent the spread of foodborne illnesses and keep people safe. The FDA has indicated that they will spend the first year educating about the rule with enforcement expected to begin in January 2029. At that time, you will need to keep records for any of the foods on the Food Traceability List.



Get ready to comply with the FDA's Food Traceability Rule, by following these steps and using the resources the National Restaurant Association has created.

### WHAT YOU NEED TO DO

1. Go to [Restaurant.org/Traceability](https://www.restaurant.org/Traceability)

2. Read the National Restaurant Association's Food Traceability Guidance Document.

3. Watch the Traceability webinar on the site.

4. Determine if your restaurant qualifies for a full or partial exemption using the Restaurant Traceability Evaluation tool.

5. Create a Food Traceability Plan for your restaurant. See the example traceability plan on the Association's traceability webpage [Restaurant.org/Traceability](https://www.restaurant.org/Traceability).

6. Determine how you will collect the required Key Data Element (KDE) information, store it for two years and share it with a regulator within 24 hours of their request. If you need an affordable, easy way to do this, see How to Set Up an Electronic Storage System.

7. **IMPORTANT!** If you send finished products to another location, you also need to pass the KDE information to that additional location.

This is the Key Data Element information that you are required to keep or have your distributors/suppliers keep for you:

- ✓ Traceability Lot Code (number used to identify the food item)
- ✓ Product Description (examples: product name, brand, type of commodity, size, style, species)
- ✓ Quantity and Unit of Measurement (number of cases, containers, tanks, weight)
- ✓ Location Description for Previous Source/ Ship From location (where food was shipped from before it arrived at your restaurant)
- ✓ Restaurant Receiving Location (address and where within your restaurant the food was received at)
- ✓ Receive Date (the date the food was received at your restaurant)
- ✓ Organization that Assigned the Traceability Lot Code (the company who assigned the Traceability Lot Code—Company Name and location can also be a URL or FFRN or GLN)
- ✓ Reference Document(s) & Reference Number (type of document & the number of the document that has the KDE information on it—it might be multiple documents)

### FOODS ON THE FOOD TRACEABILITY LIST (FTL)



Soft Cheeses



Fresh Leafy Greens



Tomatoes



Fresh-cut Fruits



Nut Butters



Fresh Herbs



Fresh Cucumbers



Fresh Peppers



Shell Eggs



Fresh Melons



Sprouts



Fresh Tropical Tree Fruits



Finfish



Smoked Fish



Fresh-cut Vegetables



Ready-to-eat Deli Salads



Crustaceans



Molluscan Shellfish, Bivalves

# Exemptions



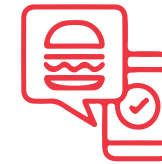
If you sell less than **\$250,000** of food in a year (during the last 3 years), you are completely exempt



If you sell less than **\$1 Million** in a year (during the last 3 years), you are exempt from the electronic spreadsheet records requirement.



If you buy food directly from a farm, including a farmer's market, that specific food is not subject to the rule



If you occasionally buy food from another retail establishment (grocery store), that specific food is not subject to the rule. (But you must keep the receipt of that transaction as part of your Traceability records and plans)

# Restaurant Traceability Evaluation (download)

This tool will help you determine if your restaurant must follow the FDA's new Food Traceability Rule. Click "yes" or "no" for each question to see what your restaurant may need to do and if your restaurant qualifies for a full or partial exemption.

**Do you sell food to the public or does your restaurant have a central kitchen that ships food to other restaurants or businesses that sell it to the public?**

YOU ANSWERED: **YES** ✓

**Are any of these Food Traceability List (FTL) foods on your menu or part of meals that you make?**

SOFT CHEESES	FRESH LEAFY GREENS	TOMATOES	FRESH CUT FRUITS	NUT BUTTERS	FRESH HERBS
FRESH CUCUMBERS	FRESH PEPPERS	SHELL EGGS	FRESH MELONS	SPROUTS	FRESH TROPICAL TREE FRUITS
FINFISH	SMOKED FINFISH	FRESH CUT VEGETABLES	READY-TO-EAT DELI SALADS	CRUSTACEANS	MOLLUSCAN SHELLFISH, BIVALVES

**YES** ✓ **NO** ✗

[START OVER](#)

Please visit [Restaurant.org/Traceability](https://www.restaurant.org/Traceability) for the latest information, tools, and guidance about the FDA's Traceability Rule.

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**Are your annual food sales more than \$250,000?**

YOU ANSWERED: **YES** ✓

**Do you buy food from a distributor or supplier?**

**YES** ✓ **NO** ✗

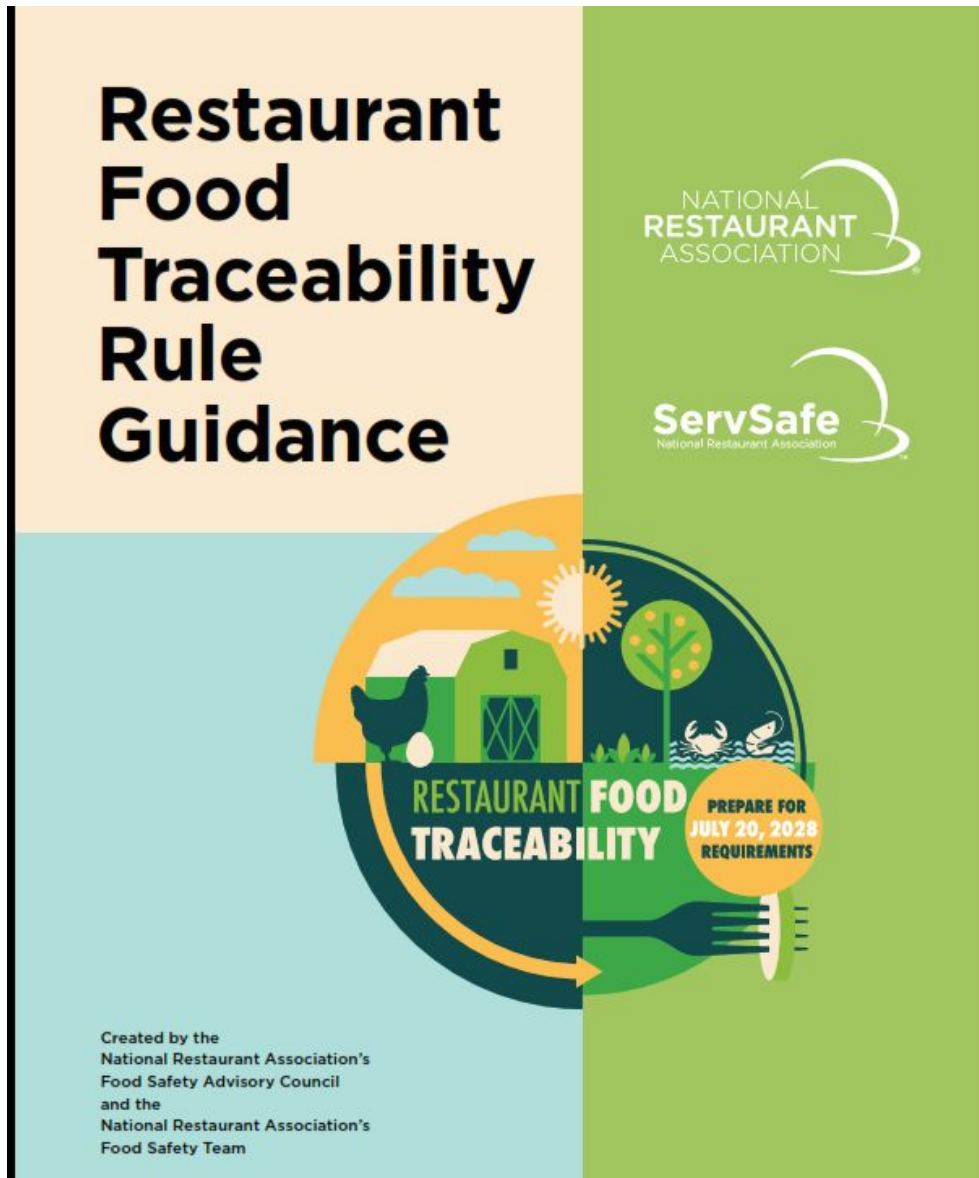
[START OVER](#)

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# Restaurant Traceability Guidance



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# Food Traceability List

- Soft cheeses
- Fresh leafy greens
- Tomatoes
- Fresh-cut fruits
- Nut butters
- Fresh herbs
- Fresh cucumbers
- Fresh peppers
- Shell eggs
- Fresh melons
- Sprouts
- Fresh tropical tree fruits
- Finfish and smoked finfish
- Fresh-cut vegetables
- Ready-to-eat deli salads
- Crustaceans
- Molluscan shellfish, bivalves

## FOODS ON THE FOOD TRACEABILITY LIST (FTL)



Soft Cheeses



Fresh Leafy Greens



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Smoked Finfish



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Ready-to-eat Deli Salads



Crustaceans



Molluscan Shellfish, Bivalves

## Food Traceability List- FDA version.

Food Traceability List	Description
Cheeses, other than hard cheeses, specifically:	
•Cheese (made from pasteurized milk), fresh soft or soft unripened	Includes soft unripened/fresh soft cheeses. Examples include, but are not limited to, cottage, chevre, cream cheese, mascarpone, ricotta, queso blanco, queso fresco, queso de crema, and queso de puna. Does not include cheeses that are frozen or previously frozen, shelf stable at ambient temperature, or aseptically processed and packaged.

## **In addition to any required key data elements, RFEs and restaurants covered by the rule must establish and maintain a traceability plan containing the following information**

**Description of the procedures you use to maintain the required records**

**Description of the procedures you use to identify foods on the Food Traceability List that you manufacture, process, pack, or hold**

**A point of contact for questions regarding your traceability plan and record**

**The traceability plan is intended to help FDA more quickly review and understand the information you provide during an investigation into a foodborne illness outbreak involving a food on the Food Traceability List. Your traceability plan must be updated as needed to reflect your current practices and ensure compliance with the final rule. Your previous traceability plan must be maintained for 2 years after you update the plan.**

*Source: <https://www.fda.gov/media/163016/download>*

# Restaurant Traceability Plan Example

## “GUZZLE’S GRILL” FOOD TRACEABILITY PLAN EXAMPLE



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## “GUZZLE’S GRILL” FOOD TRACEABILITY PLAN EXAMPLE



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*This is an example of what a simple restaurant traceability plan might look like using our fictional “Guzzle’s Grill” as an example. This document has been updated in August 2024 to include verification steps and an electronic storage process.*

### GUZZLE’S GRILL FOOD TRACEABILITY PLAN

**Average annual food sales:** over \$250K but less than \$1M

**Date Created/Updated:** September 1, 2025.

**Can destroy this Food Traceability Plan (FTP) (no sooner than 2 years):** September 1, 2027

### FOOD TRACEABILITY LIST (FTL) RECIPE REVIEW & SUPPLIER VERIFICATION PROCESS

Restaurant management created an [FTL Recipe Spreadsheet](#) of all the **FTL foods** that are used in restaurant recipes and how each supplier is providing the required **KDE** information to the restaurant. In some instances, restaurant management staff can access **KDE** information on the supplier/distributor website. In other instances, this information is sent electronically and/or included on an **Advance Shipping Notice (ASN)** or Invoice or both.

As new menu items are added, restaurant management reviews each recipe to determine if it contains any **FTL foods** and adds it to the **FTL Recipe Spreadsheet** if it does.

Restaurant management has verified that all the restaurant’s suppliers can provide the required **FTL food Key Data Element (KDE)** information. In addition, restaurant management requires that suppliers demonstrate that their supply chain partners are also compliant with the **Food Traceability Rule (Rule) KDE** reporting requirements.

### FOOD TRACEABILITY PLAN UPDATE PROCESS

We update the Food Traceability Plan if we make any significant changes and at minimum every January.

### PROCESS USED TO MAINTAIN FOOD TRACKING RECORDS

**1.** The restaurant has a designated receiving area for all deliveries. Only the owner and restaurant management staff handle the product ordering and receipt of deliveries. There is access to orders, purchase orders, invoices, **Advanced Shipping Notices** and packing lists in the receiving area and in the management office using the restaurant’s electronic tablet devices.

**2.** The receiving area is well stocked with receiving equipment and supplies (pens/pencils, scales, thermometers, iPad/electronic tablet and packing materials). Restaurant management staff has been trained in the receiving procedures and knows which foods are on the **FTL**. Staff is notified when deliveries are expected.

**3.** Upon receiving a shipment, restaurant management staff inspects the delivery for any damage. The quantity and condition of the items are checked and verified against the packing list. Items are weighed and thermometers are used (where appropriate) to ensure everything is as required per our Standard Operating Procedures (SOPs) for Receiving. Any damage, rejected items, discrepancies in quantity/temperature, type of items or difference in **Traceability Lot Codes (TLCs)** received are written/noted on the packing list. The manager signs and dates the packing list as an official sign off verification step for delivery receipt. The manager scans/photographs of the signed/dated packing list and may take additional photos of any damage or discrepancies.

**4.** Guzzle’s Grill set up a new electronic data storage system to store all traceability records. The electronic folder and document system is in our cloud storage drive (\*Google Drive). This is where we are keeping all the purchasing, required **KDEs** and receiving information.

**5.** We use an app (\*ABBYY FineReader PDF) that takes photos/scans of paper documents (example: packing list/receipts), turns them into searchable PDFs that can be labeled and stored electronically with the rest of the purchasing /ordering information. The scan/photo/label app automatically records the date the image was taken, which makes it easy to find images/files by date and allows for the deletion of photos/files after 2 years. Each photo/scan has a unique ID which is used as the document’s **Reference Number**. We can rename files with our own unique number and identification system if we choose. Staff is able to name tag/label each photo/scan with the **FTL food(s) name(s)** and supplier name(s). However, even if someone forgets to label something all files are saved as searchable PDFs which still allows the files to be keyword searched and pulled as needed.

**6.** After a manager takes the receipt delivery photos/scans, the manager adds the **FTL food(s)** and supplier name tags to the files and uploads the photos/scans file into the appropriate supplier’s folder in the electronic data storage system. The physical packing list is then placed in the receiving month’s physical folder.

**7.** As an additional quality control step, the assigned manager goes through all physical packing lists each month and confirms that all the delivery receipt images are there, tagged appropriately and in the correct electronic folder before physically destroying the signed/dated packing lists.

**8.** All **KDE** receiving information and associated documents are deleted after 2 years.

**9.** If we receive a records request from the FDA (regulator), we will create a shared folder where we will put all the files/information that we need to provide to the regulator. We will complete a keyword search on the **FTL food name(s)** and/or supplier name(s). We will then send a copy of the files pulled from the keyword search into the folder we created for the regulator and provide the regulator with access to this folder within 24 hours as is required in the **Rule**.

**Assigning Traceability Lot Codes:** We do not assign TLCs.

**Name and contact information for the person that can answer questions regarding this FTP and records:**

Kate Piche  
Guzzle’s Grill:  
123 Association Drive  
Chicago, IL 60606  
Phone: 123-456-7890  
Email: guzzlegrill@outlook.com

*\*DISCLAIMER: There are many commercial providers that offer software that can digitize, label, and store paper documents electronically. For this fictional example, we used software offered by ABBYY and Google.*

## THE BENEFITS OF DIGITAL FILE MANAGEMENT

Most suppliers will be able to maintain traceability information for your restaurant. If a supplier cannot do this or you want to keep these records yourself, this document shows the steps a restaurant can take to go from a paper-based invoice/receipt filing storage system to an electronic filing storage system. Creating an electronic filing storage system is beneficial because it does all of the following:

- Creates receipt records to verify that orders from suppliers are delivered in the right quantities, in good conditions, and at the proper time.

- This results in reduction in costs, improved management knowledge, and enhanced data collection.
- Allows everyone in management to see what was ordered/versus what was received and have photo evidence of any discrepancies or damaged products.
- In addition, eliminates paper record storage and makes it easier to find the document you need.
- Allows for better inventory management, compliance with the FDA's Traceability Rule
- Improved fulfillment of customer orders.

### STEP 1

#### DOWNLOAD A DIGITIZING APP

Download an app or purchase software that can digitize paper documents/photos into searchable PDFs and has labels/name tags that you can customize for your operation. The digitizing app we used for Guzzle's Grill Traceability Plan is called ABBYY Fine Reader PDF\*

### STEP 2

#### ELECTRONIC DATA STORAGE

Get a cloud data storage app/software or use your current secure electronic data file storage system. In Guzzle's Grill Traceability Plan, we used \*Google Drive.

### STEP 3

#### SET UP FILE FOLDERS

Set up electronic folders with supplier names to store traceability documents that include KDE information.

Example:

- 📁 Guzzle Grill Traceability Information
  - 📁 Felicia's Frozen Shrimp
  - 📁 Freshland Farms
  - 📁 Lots Of Nuts

### STEP 4

#### SCAN/PHOTOGRAPH PAPER DOCUMENTS

Take photos/scan documents using the app. Convert the image into a "Scannable PDF" or your preferred format. Then click "details" to create and add labels/tags with the FTL Food(s) and supplier name(s) to the image file(s)

### STEP 5

#### PUT THE FILE IN AN ELECTRONIC FOLDER

Upload the image/file into the correct supplier file folder in the electronic storage system.

### STEP 6

#### CREATE A FOLDER FOR REGULATOR ACCESS

When a regulator requests traceability information, create a folder that can be shared/sent to the regulator. Complete a search on FTL food and/or supplier name. It will pull all those files. Send a copy of these files to the folder for the regulator.

### STEP 7

#### DELETE FILES OLDER THAN 2 YEARS

\*DISCLAIMER: There are many commercial providers that offer software that can digitize, label, and store paper documents electronically. For this fictional example, we used easy to use and affordable software offered by ABBYY and Google.

# Digital File Management

- **Simple / User Friendly**
- **Transform paper into a Searchable PDF**
- **Smart device of any kind**
- **Cloud Storage**
- **Ability to add name tags to photos- FTL Foods**
- **Search files and put in Shared folder for regulator**

# Restaurant Food Traceability Checklist

## Steps to take to be ready

### RESTAURANT FOOD TRACEABILITY CHECKLIST



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The Food and Drug Administration's (FDA) Food Traceability Rule was created to identify foods that are potentially causing foodborne illness and rapidly remove them from the marketplace.

#### RESTAURANT-FOCUSED ACTION ITEMS

- Read the FDA's [Food Traceability Rule](#).
- Attend [webinars](#), informational sessions and read information about what other organizations are doing to prepare to follow the Rule.
- To determine if the restaurant qualifies for full or partial exemptions, download the Restaurant Traceability Evaluation.
- Download & read the National Restaurant Association's [Restaurant Food Traceability Rule Guidance](#) document. Become familiar with the Rule terminology and requirements.
- Review the [Food Traceability List](#). Go through the restaurant menu and recipes and identify which Food Traceability List Foods are used in the restaurant(s).
- Make a list of the FTL Foods used and who supplies them to the restaurant.
- Determine how the restaurant will collect and store the required FTL Foods information or if suppliers will do this for the restaurant.
- Consider setting up a [new electronic data storage system](#) to store/share the required Key Data Elements information for the FTL Foods or determine if one or more of the restaurant's existing systems can be modified to store/share this information.
- Document a Food Traceability Plan and train staff on any procedures or practices necessary to carry out the plan consistently. See this [sample Traceability Plan](#) for an example of what it might look like.
- Determine if you will need any new technology, equipment, or processes to comply with the Rule.
- Train staff in any new systems, processes, and new technology.
- Conduct a traceability information request practice session. Pick an FTL Food and see if the restaurant could provide the required KDE information to the FDA within 24 hours. Keep track of what went well and what went wrong. Use this information to make improvements.

#### DISTRIBUTOR/SUPPLIER- FOCUSED ACTION ITEMS

- Talk with your distributors, discuss if they are required to follow the Rule or if they are exempt.
- Have conversations with your suppliers, distributors, and/or enterprise resource planners to discuss how they will share, capture, verify and store the KDEs.
- Consider requesting that your distribution center/ suppliers keep track of the FTL Food KDEs for the restaurant.
- To ensure compliance and protect your restaurant, have a formal written agreement with your Distribution Center/suppliers related to them for storing and providing access to the KDE information for products you order.
- Verify that your supplier(s)/distributor(s) can:
  - Send/provide access to the KDE information that a restaurant is required to collect/keep.
  - and provide proof that all the previous supplier(s)/ distributor(s) that have had the FTL food in their possession are keeping all the CTE/KDE information that they are required to keep.
- Determine a process to verify that the Traceability Lot Codes for the products you received match the TLCs your supplier indicated they sent. Work with your supplier to determine how any TLC errors will be addressed.

**CTE:** Critical Tracking Event

**FTL Foods:** Food Traceability List Foods

**KDE:** Key Data Elements

**Rule:** Food Traceability Rule

**TLC:** Traceability Lot Code

*Please see the Restaurant Food Traceability Guidance Document for definitions and more details on these terms.*

# Restaurant Traceability Flyer

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## DO YOU SERVE THESE FOODS IN YOUR RESTAURANT?



NATIONAL RESTAURANT ASSOCIATION



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- ✓ Traceability Lot Code (number used to identify the food item)
- ✓ Product Description (examples: product name, brand, type of commodity, size, style, species)
- ✓ Quantity and Unit of Measurement (number of cases, containers, tanks, weight)
- ✓ Location Description for Previous Source/ Ship From location (where food was shipped from before it arrived at your restaurant)
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Molluscan Shellfish, Bivalves

# Thank You

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