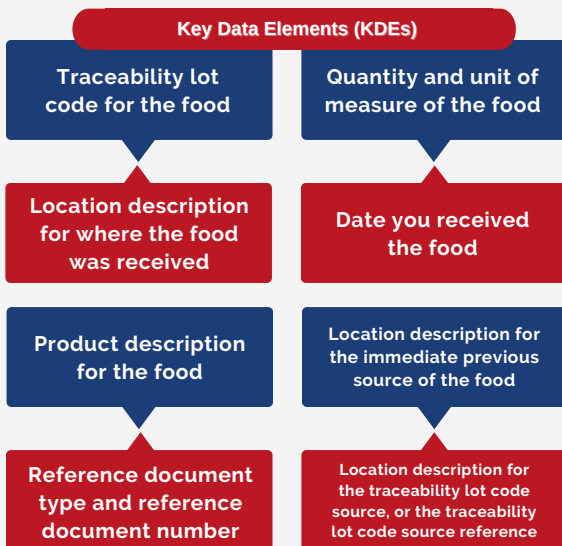
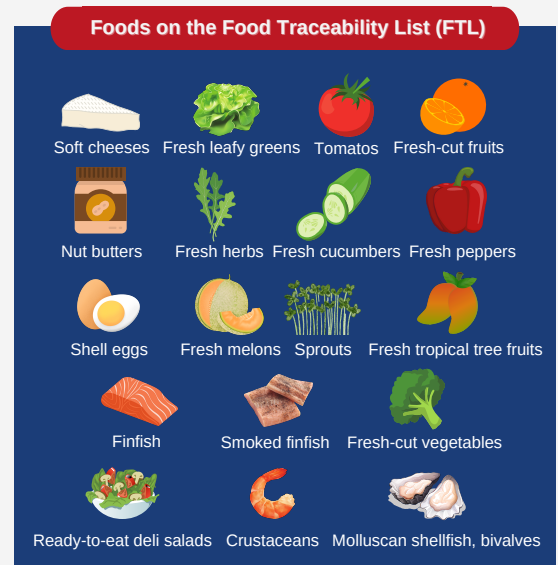


## The Food and Drug Administration's (FDA) New Traceability Recordkeeping Requirements for High-Risk Foods

FDA has issued regulations that will require restaurants to meet recordkeeping requirements starting in 2026. Restaurants will be required to maintain certain records for foods on the FDA's Food Traceability List (FTL). The FTL is a list of foods that are more frequently associated with foodborne illness outbreaks. The purpose is to help the FDA more rapidly identify potentially contaminated foods when an outbreak occurs.



Under the new regulations, restaurants will be required to maintain receiving records that contain specific key data elements that can be linked to the traceability lot for each food. Some restaurants may also be required to maintain additional records if they utilize a centralized facility to ship to its restaurant locations. Covered entities may enter into agreements with individuals or firms to create and keep the records required by the rule on their behalf.

Restaurants must develop a traceability plan that clearly describes the procedures for maintaining the required traceability records. In the event of an outbreak, the FDA may request that the key data elements be shared in an electronic sortable spreadsheet within 24 hours. All records must be kept for a period of 2 years.

### Exemptions:

- Exemption from sortable spreadsheet requirements for restaurants with <\$1 million in annual food sales
- Full exemption from any recordkeeping requirements for restaurants with <\$250,000 in annual food sales

#### Resources:

- National Restaurant Association webinar with FDA: <https://tinyurl.com/2p8668ba>
- FSMA Final Rule on Requirements for Additional Traceability Records for Certain Foods: <https://tinyurl.com/pwdcw65y>
- Retail Food Establishments (RFEs) and Restaurants: What Records Do I Need to Keep for the Food Traceability Rule: <https://tinyurl.com/4vzcgwvv>
- Retail Food Establishments (RFEs) and Restaurants: What You Need to Know About the Food Traceability Rule: <https://tinyurl.com/mvh32r7f>
- Retail Food Establishments (RFEs) and Restaurants: What You Need to Know About Establishing and Maintaining a Traceability Plan for the Food Traceability Rule: <https://tinyurl.com/yckwjcbce>