

Restaurant Food Traceability Rule Guidance



Created by the
National Restaurant Association's
Food Safety Advisory Council
and the
National Restaurant Association's
Food Safety Team

DISCLAIMER

This document is not intended as legal counsel. It represents our best understanding of the **FDA's Food Traceability Rule (Rule)** at this time.

We will update this document as we get additional information and greater clarity about the new **Rule**.

FOOD TRACEABILITY RULE HISTORY

The Food Safety Modernization Act (FSMA) was created to respond to the changes in the food industry globally, including a higher risk of foodborne illnesses. Congress enacted FSMA in 2009 to address these food safety issues.

On September 23, 2020, the FDA published the Food Traceability Proposed Rule as part of the FDA's New Era of Smarter Food Safety.

In January 2021, the FDA revised the **Food Traceability List (FTL)** and published a detailed FAQ that answered commonly asked questions that emerged following the announcement of the Proposed Rule.

In February 2021, the comments period for the modifications closed. The FDA published the final version of the Rule on November 15, 2022.

ABOUT THE FDA FOOD TRACEABILITY RULE

The Food & Drug Administration's (FDA) [Food Traceability Rule](#) aims to track food through the entire supply chain until it reaches a consumer.

This new regulation requires that restaurants have a **Food Traceability Plan (FTP)**, keep records, and prepare to follow the Rule if their menu includes any foods on the FDA's [Food Traceability List \(FTL\)](#). The FDA has stated that the foods on the **FTL** are more frequently associated with making people sick.

The FDA believes that following this **Rule** will result in faster response times, including:

- accurately identifying which food(s) may be causing illness, resulting in less marketplace confusion, harm, and waste
- tracking and removing contaminated food from the marketplace to minimize consumer illness or death
- improving foodborne illness prevention strategies
- creating a uniform set of requirements to track food items
- reducing coordination challenges between different types of food businesses and regulators

PURPOSE OF THIS GUIDANCE

The National Restaurant Association has created this Restaurant **Food Traceability Rule** guidance document to help restaurants prepare to follow the FDA's **Food Traceability Rule** before the January 2026 deadline.

It is important for a restaurant to know how the rule may impact current business practices long before the deadline, as most restaurants need time to figure out the best way to meet the new requirements and get solutions in place.

Topics covered in this guidance:

- Traceability Definitions
- **Food Traceability List (FTL) Foods**
- Restaurant Exemptions
- Restaurant Requirements & Preparation Recommendations

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TRACEABILITY DEFINITIONS

The FDA has used new words and phrases in the **Food Traceability Rule** that restaurant staff may not be familiar with. To comply with the new requirements, you may need to learn a few distributor-related terms too. These unfamiliar words and phrases appear in **bold** in this document, and the definitions are included in this section to familiarize you with their meaning.

ADVANCED SHIPPING NOTICE (ASN):

An **ASN** is a notice sent by a shipper ahead of a shipment to inform that a delivery is about to arrive. **ASNs** are used in **Electronic Data Interchanges (EDIs)**. The **ASN** can contain order information, product descriptions, packaging types, and carrier information.



CRITICAL TRACKING EVENT (CTE):

A **critical tracking event** is a time something significant happens with a **Food Traceability List (FTL)** food. These “events” in the life of an **FTL food** include:

- growing or raising
- creation
- harvesting
- cooling before initial packaging. This includes produce that has been harvested and then cooled. It does not include cooling at a restaurant.
- initial packing of a **raw agricultural commodity (RAC)**. An **RAC** is any food in its raw or natural state, including all fruit that is washed, colored, or otherwise treated in unpeeled natural form before marketing. This does not include an **FTL food** initially received from a fishing vessel.
- receiving
- **transforming** the food
- shipping

ELECTRONIC DATA INTERCHANGE (EDI):

An **EDI** is an electronic data exchange of business information between two or more organizations electronically. This often replaces using paper documents (e.g., purchase orders or invoices).

FOOD TRACEABILITY LIST (FTL) OR FOOD TRACEABILITY LIST FOOD (FTL FOOD):

According to the FDA, these are the foods that are at a higher level of risk for causing foodborne illness.

FTL foods include 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, and bivalves.

If you have questions or need more clarity about what is on this list, please review the [Food Traceability List-FDA version](#).

FOOD TRACEABILITY PLAN (FTP):

A **food traceability plan** explains how your restaurant creates and maintains **FTL Food** required information. It is intended to help the FDA quickly review and understand the information you provide during a foodborne illness outbreak investigation related to food(s) on the **Food Traceability List**.

FOOD TRACEABILITY RULE (RULE):

These are the regulations that the FDA created to go with the Food Safety Modernization Act (FSMA). The full **Rule** and associated guidance can be found [here](#).

FOOD TRANSFORMATION OR TRANSFORMATION:

Transformation occurs when a **Food Traceability List (FTL)** food is mixed or blended with other foods, repacked/repackaged and then shipped to another location, or is relabeled.

Transformation does not include:

- the initial packing of an **FTL food** when it is first assigned a **traceability lot code**.
- any activities that happen before the FTL food is packed and assigned a **traceability lot code (TLC)** (e.g., Harvesting or Cooling—not cooling at a restaurant)
- when you break a large case of **FTL food** into smaller units, so long as you do not repackage these smaller units or ship them.
- taking a pallet that includes many individual packed cases and breaking the individual cases into separate shipments—so long as none of the individual cases are re-packaged, relabeled or mixed/blended in the process. If they are, then food **transformation** has occurred.

KEY DATA ELEMENT (KDE):

A **Key Data Element (KDE)** is information about an **FTL Food's Critical Tracking Events (CTEs)**. **KDEs** include: the traceability lot code, quantity and unit measure of the food, food description, previous food suppliers' location, restaurant receiving location, date received, and reference documents with identification numbers.

All **KDE** information must be kept for a minimum of two years.

Some **KDEs** must be provided to other food supply chain businesses and maintained on-site. In some situations, a restaurant might receive an **FTL food** record with **KDEs** from a supply chain partner (e.g., the shipper) and then the restaurant would not need to create their own **KDE** record.

KILL STEP:

A **kill step** means doing something that kills or damages organisms that cause disease in a food.

Example of a **kill step**: Cooking chicken to an internal temperature of 165°F.

Example of what is not a **kill step**: Washing some fruit. A washing process reduces the number of organisms that cause disease but does not kill them.

PRODUCT TRACING SYSTEM (PTS):

The **Product Tracing System (PTS)** is an internal technology system that is being created for the FDA to track all food in the United States or offered for import into the United States. The new **PTS** system will receive and analyze industry food traceability data.

RAW AGRICULTURAL COMMODITY (RAC):

A **raw agricultural commodity (RAC)** is any food in its raw or natural state, including all fruit that is washed, colored, or otherwise treated in unpeeled natural form before marketing. This does not include an **FTL food** initially received from a fishing vessel.

REFERENCE DOCUMENT AND REFERENCE DOCUMENT NUMBER:

Reference documents are bills of lading, purchase orders, advance shipping notices (ASNs), work orders, invoices, database records, batch logs, production logs, field tags, catch certificates, and receipts. The reference document number is the number assigned to the reference document.

TRACEABILITY LOT CODE (TLC):

A **traceability lot code** is an alphanumeric code/barcode used to uniquely identify a specific batch (lot) of food from the business that originally created, **transformed**, first received from a fishing vessel, or packaged the **FTL food** and assigned a code to the batch. Lot-based recordkeeping is not required when an **FTL food** is harvested or at any point before the initial packing or first land-based receiving. Restaurants only need to assign a **TLC** if they are acting as a distributor or are the central kitchen for a chain.

A lot code, batch code, or other production code for an **FTL food** can be used as a **traceability lot code** if it meets the above definition. Additional examples of TLCs are Global Trade Identification Numbers (GTINs), Global Location Numbers (GLNs), GS1-128 numbers, Serial Shipping Container Codes (SSCCs) and unique or globally unique identifiers (GUIs).



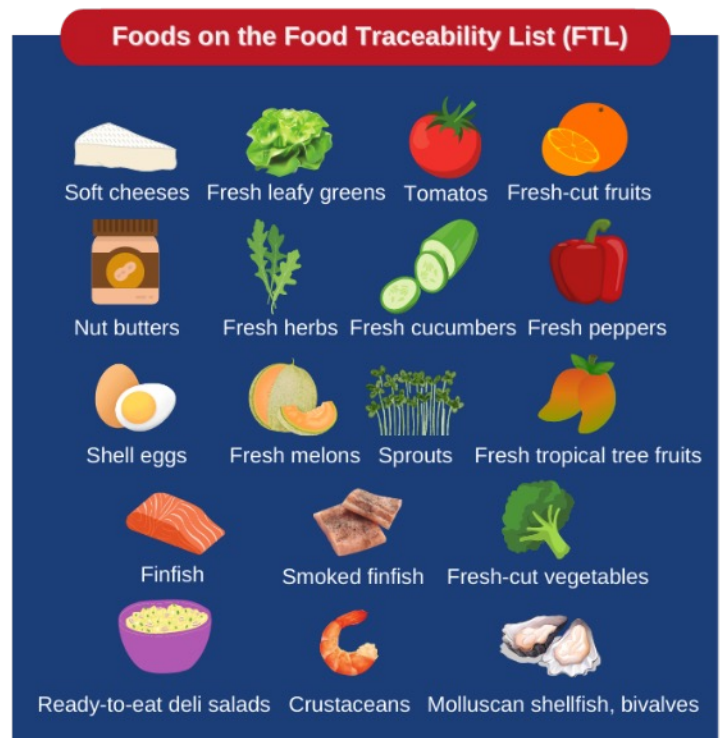
FOOD TRACEABILITY LIST

The FDA researched and determined that there are certain foods that have a higher level of risk for causing foodborne illness. They used that information to create the **Food Traceability List (FTL)**.

If your recipes and food sales include any of these **Food Traceability List Foods (FTL foods)**, you must follow the FDA's **Food Traceability Rule** unless you qualify for an exemption.

Food Traceability List Foods (FTL Foods)

- 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



If you have questions or need more clarity about what is on this list, please review the [Food Traceability List- FDA version](#).

The FDA intends to update the **FTL** every five years and may add additional foods to this list in the future.



FOOD TRACEABILITY RULE RESTAURANT EXEMPTIONS

The FDA has determined that not everyone in the food supply chain will need to follow the new **Rule**. Some businesses may qualify for full or partial exemptions.

We have made it easy to determine if your restaurant qualifies for a full or partial exemption. Please download this [Restaurant Traceability Evaluation](#) to determine if you qualify for any of the exemptions listed below.

- **Exemption** — Small Restaurants.
If your food sales are less than \$250,000 annually, you are fully exempt from following the **Rule** at this time.
- **Exemption** — Non-profit Restaurant.
Non-profit restaurants are exempt from following the **Rule** at this time.
- **Partial Exemption** — Restaurants that only purchase food from a farm or grower.

Restaurants that get all their food directly from a farm or grower may not need to follow the **Rule**.

However, restaurants that get all their food directly from a farm or grower do need to:

1. document the name and address of the farm(s) you purchase from.
2. document type(s) of food you purchased from the farm(s).
3. maintain the records for 180 calendar days. [Time/Date Calculator Online Tool](#) can help.

SAMPLE SPREADSHEET

Name of Farm	Farm Address	Type of Food Received from Farm(s)	Date Received	Deletion Date of Record
Johnson Farm	125 Farm Rd. Washington, DC 20001	Spinach	6/28/2023	12/25/2023

- **Partial Exemption** — Restaurants that occasionally make purchases from another provider outside of the normal purchase process OR if the restaurant provides food to other food providers.

For these situations, you must maintain a record of the purchase for two years.

Record of purchase must include this information:

- Product purchased
- Date of purchase
- Seller name/company
- Seller address

SAMPLE SPREADSHEET

Date of Purchase	Name of Product	Seller/Company Name	Seller Address	Record Deletion Date
7/4/2023	Red pepper	Sam's Club	12345 Joliet Rd, Hodgkins, IL 60525	7/4/2025

- **Partial Record Keeping Exemption** — for restaurants that have more than \$250,000 in annual average food sales and less than \$1 million in annual average food sales.

Restaurants that have more than \$250,000 in annual food sales, but less than \$1 million in annual food sales are required to follow the **Rule**. However, they are not required to keep their traceability records for **FTL Foods** in an electronic, sortable spreadsheet.

Instead, they can keep physical or true copies of these **reference documents**: bills of lading, purchase orders, **advance shipping notices (ASNs)**, work orders, invoices, database records, batch logs, production logs, field tags, catch certificates, and receipts.

These physical records must be legible and stored to prevent deterioration or loss. They must be kept for a minimum of two years. They can be kept off-site so long as they can be accessed within 24 hours of the FDA's official request for this information.

Note: Only restaurants with more than \$1 million in annual food sales have to keep the required records in an electronic, sortable spreadsheet.



RESTAURANT REQUIREMENTS AND PREPARATION RECOMMENDATIONS

WHY YOUR RESTAURANT NEEDS TO START PLANNING FOR THE **RULE** DEADLINE RIGHT NOW

Restaurants must meet the requirements of the FDA's **Food Traceability Rule** by January 20, 2026.

This deadline may seem so far away that some businesses will think it's ok to wait until closer to the deadline before they need to do anything. This would be a big mistake.

It's important for a restaurant to know how the **Rule** may impact current business practices long before the January 2026 deadline. Restaurants will need time to figure out the best way to meet the new requirements and get solutions in place. The restaurant perspective is a critical part of how the food supply chain prepares to follow this new **Rule**.

For example, right now, your food distributors/suppliers are trying to figure out how they will meet the requirements of the **Rule** and get the required tracking information to your restaurant. If your restaurant starts planning now, you can talk with your distributors/suppliers and be a part of the process of determining how that happens. If you wait, they may figure out how they will do it in a way that works best for them, but might not work so well for your restaurant.



Getting involved now means that you can provide input on what would work best for your restaurant to help create a tracking system that works well for everyone.

In addition, your restaurant will need time to learn as much as possible about what the **Rule** requires and how it impacts your business. You may need to purchase new technology and new equipment. It will take time to create the new documents, new processes and train your staff.

RESTAURANT TRACEABILITY PLANNING REQUIREMENTS

If your restaurant is not exempt—either fully or partially—you are required to follow the FDA's **Food Traceability Rule**, and you are responsible for three main activities:

REQUIREMENT 1: Have a Food Traceability Plan (FTP)

In this section we will:

1. Share what information must be covered in your **Food Traceability Plan** depending on the activities that happen in your restaurant.
2. Provide a sample of a Restaurant **Food Traceability Plan**.

REQUIREMENT 2: Recordkeeping

In this section we will:

1. Cover the **Key Data Element** information you need to keep and provide to the FDA if requested
2. Provide an example of traceability recordkeeping
3. Discuss electronic spreadsheet and physical recordkeeping requirements
4. Share how to send food traceability data to the FDA

REQUIREMENT 3: Food Traceability Rule Restaurant Preparation

In this section we will cover:

1. How to prepare to follow the Rule
 - Restaurant-focused action items
 - Distributor/supplier-focused action items
 - Enforcement of the Rule

REQUIREMENT 1: FOOD TRACEABILITY PLAN

One of the main items that the new Rule requires is that all food businesses have a **Food Traceability Plan (FTP)**.

A **Food Traceability Plan** explains how your restaurant will create and maintain the required **Food Traceability List** food information. It is intended to help the FDA quickly review and understand the information that you provide during a foodborne illness outbreak investigation related to food(s) on the **Food Traceability List**.

Your restaurant's **Food Traceability Plan** must:

- explain the process used to maintain the required food tracking records.
- describe how you identify foods on the **Food Traceability List** that are on your menu at any time.
- provide the name and contact information of the person who can answer questions regarding your **Food Traceability Plan** and records.
- be kept for a minimum of two years.
- be updated as needed to reflect your current practices. Note: When you create an updated plan, you must save your previous **Food Traceability Plan** for at least two years.

If your restaurant ships food to other restaurants or suppliers, your **Food Traceability Plan** must also:

- Show how you assign **traceability lot codes (TLC)** to foods on the **Food Traceability List (FTL)**.

If your restaurant grows or raises a food on the **Food Traceability List** (other than eggs) your plan must include a map showing the location areas where you grow or raise these foods.



- The map must show the location and name of each field (or other growing area) where you grow food on the **Food Traceability List (FTL)**, including geographic coordinates and any other information needed to identify the location of each field or growing area.
- For aquaculture, the map must show the location and name of each container (e.g., pond, pool, tank, cage) in which you raise seafood on the **Food Traceability List (FTL)**, including geographic coordinates and any other information needed to identify the location of each container.

In addition, your plan must show how you assign **traceability lot codes (TLC)** to foods on the **Food Traceability List (FTL)**.

FOOD TRACEABILITY PLAN EXAMPLE

The following example shows what a **Food Traceability Plan** may look like for a restaurant with average annual sales greater than \$250,000 but less than \$1 million.

GUZZLE'S GRILL FOOD TRACEABILITY PLAN

Date Created/Updated: September 1, 2026.

Do not destroy this Food Traceability Plan sooner than two years (September 1, 2028).

The process we use to maintain food tracking records:

Our average annual food sales are over \$250,000 but less than \$1 million. We keep physical records for all **FTL foods** in an extra-large locked, fireproof and waterproof filing cabinet in the restaurant manager's office.

Our staff has been trained on what documents we need to keep on each **FTL food**, and we have a box outside the manager's office marked "**FTL Documents**" for staff to place these documents after receiving them from distributors/suppliers. The restaurant manager prints any **FTL** documents that arrive electronically and saves them in the **FTL Food** documents folder on the computer as a backup storage system to ensure nothing is missed.

Each month, the restaurant manager creates a physical folder for each category of **FTL Food** to store required **FTL food reference documents** (e.g., receipts, purchase orders, etc.) for the month. Folders are marked with the **FTL food** category, name, month, and year. **FTL food** categories include Produce, Fish/Seafood, and Dairy.



Each week, the manager goes through all the **FTL** documents and inspects them to ensure they have all the required information on them, including a unique ID number before adding them to the corresponding **FTL Food** Category folder. The manager stores all **FTL Food** documents in the month/year folder corresponding to that **FTL food** category and the date the restaurant received the **FTL food**.

If a document does not have a unique identifier on it, then we add it to our unique ID spreadsheet. We used a free online unique identifier code generator to create unique ID codes, put those codes in a spreadsheet and then created a column in the spreadsheet to record which **FTL food** document we put the code on. Every time we get a new document that is missing a code, we add the next unused unique code to the **FTL food** document, and we add the **FTL food** document name to the unique ID spreadsheet.

FTL food folder contents are shredded after the two-year storage requirement. Then, the folder is recycled, and a clean label is placed on it to be used in future filing efforts.

How we identify foods in our restaurant that are on the Food Traceability List:

We started by reviewing our menu recipes individually and identifying those recipes that included foods on the **FTL**.

Next, we talked with our distributors/suppliers to determine how we would best be able to collect the **Key Data Element (KDE)** information from the **Critical Tracking Events** for each **FTL food** and created our storage for traceability record-keeping requirements.

We created a list of all the **FTL foods** we must keep records for. It includes the date we started keeping records for the food. If we no longer use the **FTL food**, it provides the date we stopped using it. It also says what types of records we need to keep related to each **FTL food**.

As we add a new menu item, we review the recipe to determine if it contains any foods on the FDA's **FTL**. If it is a new item to our **FTL Food** main list, we add it to the list and keep all necessary documents in the appropriate folder moving forward.

Name and contact information of the person who can answer questions regarding this traceability plan and our record:

Kate Piche
123 Association Drive, Chicago, IL 60638
Phone: 312-485-6925 | Email: kpiche@restaurant.org

Food Traceability Plan Update process:

We update the **Food Traceability Plan** as needed and at least once a year.



REQUIREMENT 2: RECORD KEEPING

The FDA's **Food Traceability Rule** includes different requirements for recordkeeping depending on who your distributors/suppliers are, what types of activities you do that require tracking and how much your annual food sales are.

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
 - Food description
 - Previous two distributors/suppliers and locations. Example: You received leafy greens from Sysco, and their address in Phoenix, AZ. Before that they were at ABC packing company, and their address was in Somewhere, CA.
 - Restaurant Receiving Location (e.g., loading dock, receiving area of the restaurant)
 - Date you received the food
 - The name of and the location description of the initial supplier/grower that assigned the traceability lot code. Examples of traceability lot code sources include, but are not limited to:
 - the FDA Food Facility Registration Number for the traceability lot code source
 - a web address that provides the FDA with the location description/address for the **traceability lot code** source.
- **Reference document** and **reference document number**.

Reference documents are bills of lading, purchase orders, **advance shipping notices (ASNs)**, work orders, invoices, database records, batch logs, production logs, field tags, catch certificates, and receipts. **The reference document number** is the number assigned to the **reference document**.

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.



If a restaurant receives food from a person or business that does not need to follow the **Rule**, you must create, maintain—and link to the **traceability lot code** of the food—the following **KDEs**:

- **Traceability Lot Code**
 - Food quantity and unit measurement
 - **FTL food** and description
 - Previous two suppliers and locations
 - Restaurant receiving location
 - Date you received the food
- **Reference document** and **reference document ID number**

Restaurants do not need to attach **KDEs** and **TLCs** to specific recipes and meals. However, restaurants do need to keep records on any **FTL food** that they receive from a distributor/supplier or for any food they grow or ship to another business.

In most cases, records containing the **KDE** information must be kept for two years from the date you created or obtained the records. One exception is records maintained by a restaurant for food bought directly from a farm. Those records must be maintained for 180 days.

Restaurants that use a central kitchen model **transform** (mix, blend, repack, relabel) and ship menu items before selling them to consumers. The FDA views this model as operating as a manufacturer/processor/distributor. As a result, the central kitchen must keep the **KDE** records for two years.

Please see the sample **KDE** record below:

FTL Food	Description	Date Received	Restaurant Receiving Area	Reference Document & ID Number	QTY/ Units	Traceable Lot Code	Previous Supplier & Location	TLC Supplier & Location
Shell Eggs	Large, Grade A	12/1/2023	Back Door Receiving Area	Receipt #23595	500/24 Packs	BR2546442	Sodexo @ 2301 Maitland Center Pkwy Ste 350, Maitland, FL 32751	Humpty Dumpty Eggs @ 256 Gingerbread Lane, Tallahassee, FL 32300

The FDA encourages restaurants to work with distributors/suppliers to decide the best way to store, and access required **KDE** information. Please talk with your distributors/suppliers as soon as possible to understand how they intend to share the required **KDE** information with your restaurant.

If your average annual food sales are over 1 million, you must keep the **FTL Food** records in an electronic, sortable spreadsheet. Spreadsheet requirements include:

- Recording and tracking all required **key data element (KDE)** information for foods on the **Food Traceability List**. Electronic records may include links to the information required to be maintained under the rule.
- Keeping all required data for a minimum of two years.
- Providing FDA access to the spreadsheet within 24 hours of their request.
- You may have other organization(s) create and maintain records on your behalf. However, you are still responsible for ensuring that those records can be accessed and provided onsite within 24 hours of FDA request. Electronic records are onsite if they are accessible from an onsite location.

The **Rule** does not require any specific technology be used to keep the required records.

Restaurants with an average annual food sale of over \$250,000 but less than \$1 million are exempt from the requirement to provide the FDA with an electronic, sortable spreadsheet upon request. However, these restaurants must still maintain the records required by the **Rule**.

These records must meet these standards:

- Records must be kept as original paper or electronic or true copies (such as photocopies, pictures, scanned copies, or other accurate reproductions of the original records).
- Records must be legible and stored to prevent deterioration or loss.

- Offsite records storage is permitted if the records can be accessed and provided onsite within 24 hours of FDA request.
- You may have other organization(s) create and maintain records on your behalf. However, you are still responsible for ensuring that those records can be accessed and provided onsite within 24 hours of FDA request.
- Keeping all required data for a minimum of two years.

SENDING FOOD TRACEABILITY DATA TO THE FDA

When the FDA requests that the industry provide tracking data on an **FTL food**, they have indicated there will be a couple of ways to provide the information:

1. Email it to the FDA, and the FDA will then upload the data into its new **Product Tracing System (PTS)**.
2. Directly upload an electronic sortable spreadsheet or other traceability records into the FDA's Safety Reporting Portal (SRP). Note: This portal is now being updated to add a traceability-specific landing page. The Association will add the link to its traceability resources once it is available.

The FDA will provide more information on how the industry can upload or provide traceability documents before the January 20, 2026, deadline. We will update this guidance as more information becomes available.

We know that the FDA is creating a **Product Tracing System (PTS)** to track all food in the United States or food offered for import into the United States. The new **PTS** system will receive and analyze food traceability data from the industry.

Once industry food traceability data is uploaded, the **PTS** automatically processes the information into a visibility data standard called EPCIS (Electronic Product Code Information Services). Note: The industry is not required to send food traceability data to the FDA in EPCIS format.

This new **PTS** will have strict data security and network security protocols. Only government users with permission will be able to access the data. FDA will protect all confidential information from disclosure.

REQUIREMENT 3: RESTAURANT PREPARATION

Be ready to follow the **Rule** before the deadline of January 20, 2026.

Consider taking these actions to prepare your restaurant for this deadline.

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**.
- Read traceability guidance documents (like this one).
- To determine if your restaurant qualifies for full or partial exemptions, download the [Restaurant Traceability Evaluation](#).
- Create a project plan, with targeted completion dates for certain tasks, and decide which staff will be involved in determining how your restaurant will comply with the **Rule**.

- Go through your menu and recipes and identify what **FTL Foods** you use in your restaurant(s).
- Make a list of the FTL Foods that you use and who supplies those foods to your restaurant.
- Determine how you will collect and store the required **FTL Food** information.
- Create a **Food Traceability Plan** and train your staff on any procedures or practices necessary to carry out the plan consistently.
- Train your staff in new systems and possibly new technology.
- Purchase new technology or equipment.
- Get spreadsheet software and learn how to use an electronic, sortable spreadsheet.
- Find storage space, storage supplies and create a storage system for traceability records.
- If your restaurant qualifies for the partial record-keeping exemption, consider keeping documents in physical or electronic category folders (example: Produce, Dairy, Fish/Seafood) to provide a full traceback using the original packed carton information.
- Conduct a traceability information request practice session. Pick a particular product and see if you can provide the requested tracking 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 and determine if they all need to follow the **Rule**.
- Begin conversations with your suppliers, distributors, and/or enterprise resource planners to discuss how to share, capture, and store the **KDEs**.
- Consider requesting that your distribution center keeps track of your products.
- To ensure compliance and protect your restaurant, have a formal written agreement with your Distribution Center related to them to tracking your products.
- Consider setting up a standard communication with your distributors/suppliers to enable full visibility of traceability information, such as traceability lot codes. This may include setting up an **Electronic Data Interchange (EDI)** with your distributor(s) to send **Advance Ship Notices (ASNs)**.
- If you can, find a way to automate populating the electronic, sortable spreadsheet with the **KDE** information so there is less manual effort needed to track foods.



ENFORCEMENT

The FDA says that it will not begin routine traceability inspections until sometime in 2027. However, the FDA may conduct traceability inspections any time after January 20, 2026, and before 2027 if it has reason to do so—for instance, during a foodborne illness outbreak investigation.

Before enforcement and routine inspections begin in 2027, the FDA may provide fact sheets and opportunities for businesses to ask questions about the Rule during other routine FDA inspections.

CONCLUSION

We hope this guidance document has helped clarify what the new **Rule** requires and how to prepare to follow the new **Rule**.

The Association will update this guidance document and the [Food Traceability Rule Web Page](#) as more information becomes available. We hope to answer additional questions that the industry may have that were not covered in the current guidance document.

Please send questions and feedback about this guidance to Kate Piche — Sr. Director, Food Safety & Regulatory Compliance, kpiche@restaurant.org, or Patrick Guzzle — Vice President, Food Science, pguzzle@restaurant.org.



This Restaurant Food Traceability Rule Guidance document covers all the information that a restaurant needs to know to prepare to follow the FDA's Food Traceability Rule. Please visit the Association's [Food Traceability Rule Web Page](#) for the most recent version of this guidance document and for additional preparation information and tools.

