

# Traceability Today: Guilty Until Proven Innocent

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A key difference between the Consumer Packaged Goods (CPG) industry and the Produce industry is that CPG brands are distinguished at retail. This allows retailers to not only capture product movement data for each individual brand, but to also track waste and do recalls (if needed) by those brands. If a box of cereal, for example, is recalled, they do not recall all cereals, they only recall a specific brand of cereal.

When a produce commodity is recalled, all suppliers of that commodity are considered “guilty until proven innocent” and are consequently implicated as part of the recall, until such time each supplier of that commodity “clears” themselves. The longer it takes for a supplier to prove their innocence, the longer their product remains out of commerce.

What can we do to combat this? Short of selling our commodities as individual brands like the CPG industry, there are a several steps to consider. The first step, and already adopted by the industry, is to incorporate stringent food safety practices into your operations in order to minimize food borne illness. Since we cannot realistically test every piece of produce at each step of the supply chain, food safety issues will still occur. The second step is to incorporate stringent traceability protocols into your operations (internal traceability). The next step is to link these internal traceability systems with a common industry language—to quickly and efficiently trace and track product throughout the entire supply chain (whole-chain traceability). The Produce Traceability Initiative, or PTI, was created for this purpose. What companies do not realize is that the PTI was also created to help companies clear themselves if they are involved in a food safety investigation.

If subsequent handlers read and store the GTIN and Lot/Batch number displayed on cases as required by the PTI, the FDA can use that information in their trace-back investigation. This helps limit the scope of the investigation to the specific GTINs and Lot/Batch numbers on the implicated cases. Having the GTIN and Lot/Batch number history allows companies to react more quickly and effectively to an FDA inquiry, thereby allowing them to clear themselves faster.

Retailers will most likely continue to find suppliers of commodities “guilty until proven innocent” until they have reason to change their thinking. That kind of change will only happen when our commodities become individually branded and have a UPC or DataBar barcode scanned at point-of-sale to distinguish one grower’s product from another’s. Until then, we can take advantage of what the PTI can do for us now. Not only does it give our industry a plan to trace and track produce through the entire supply chain when something slips through the food safety nets, but it will also allow us to more quickly and efficiently clear our products and get them back into commerce.