

Getting from Point A to Point Z: Traceability in Seafood is more than COOL

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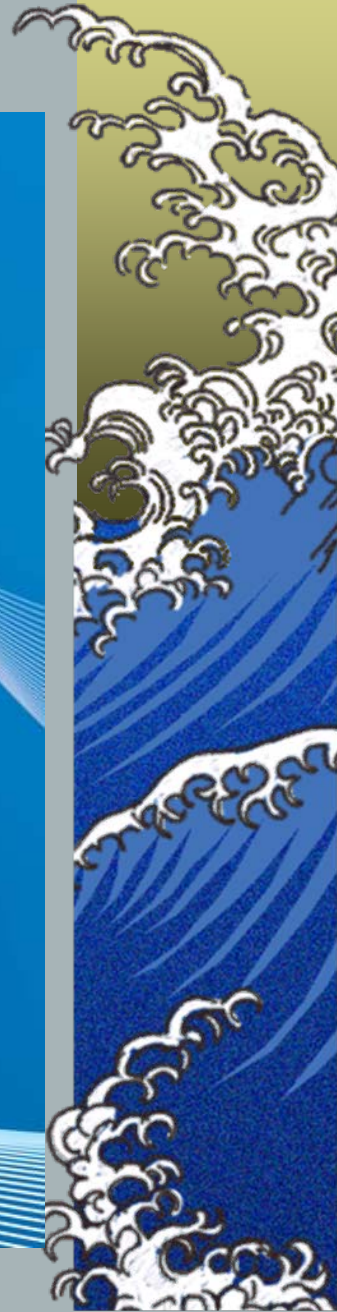
Presented at NC Aquaculture Conference

January 22, 2010

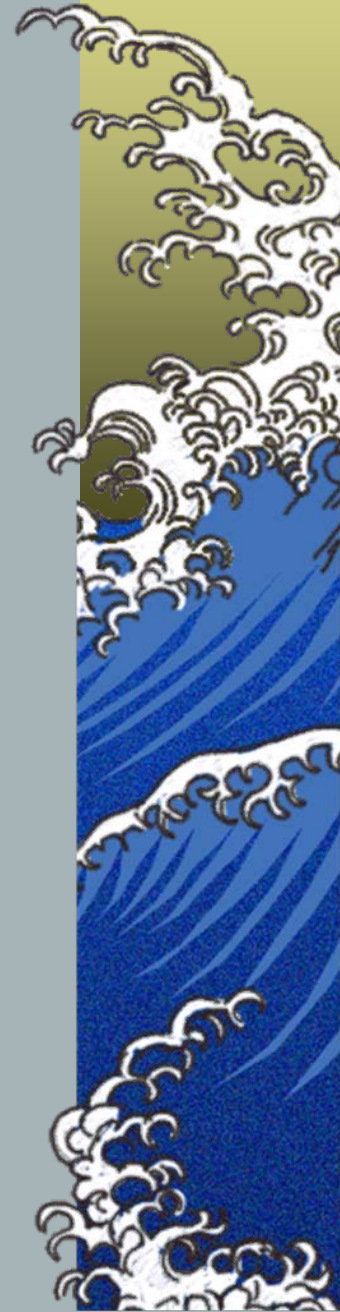
Atlantic Beach, NC



Where does your seafood come from?



Over 80% is imported.
Over 55% is from southeast Asia.

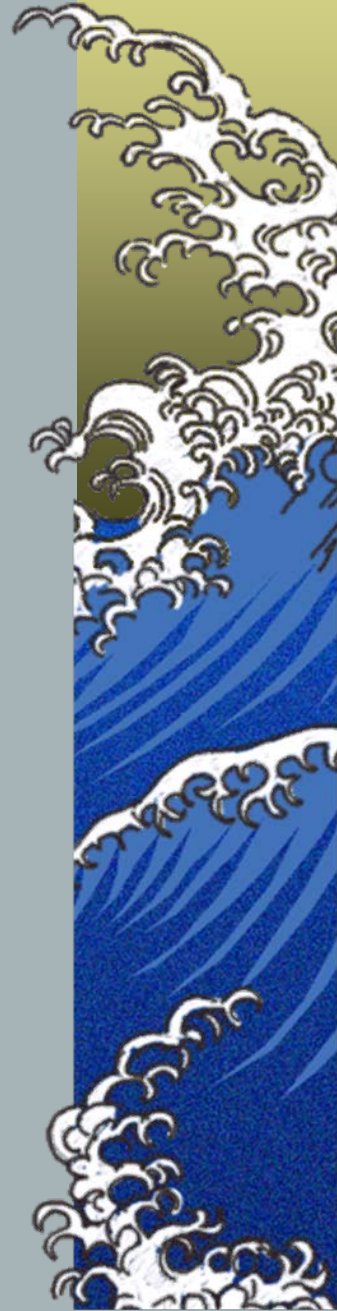
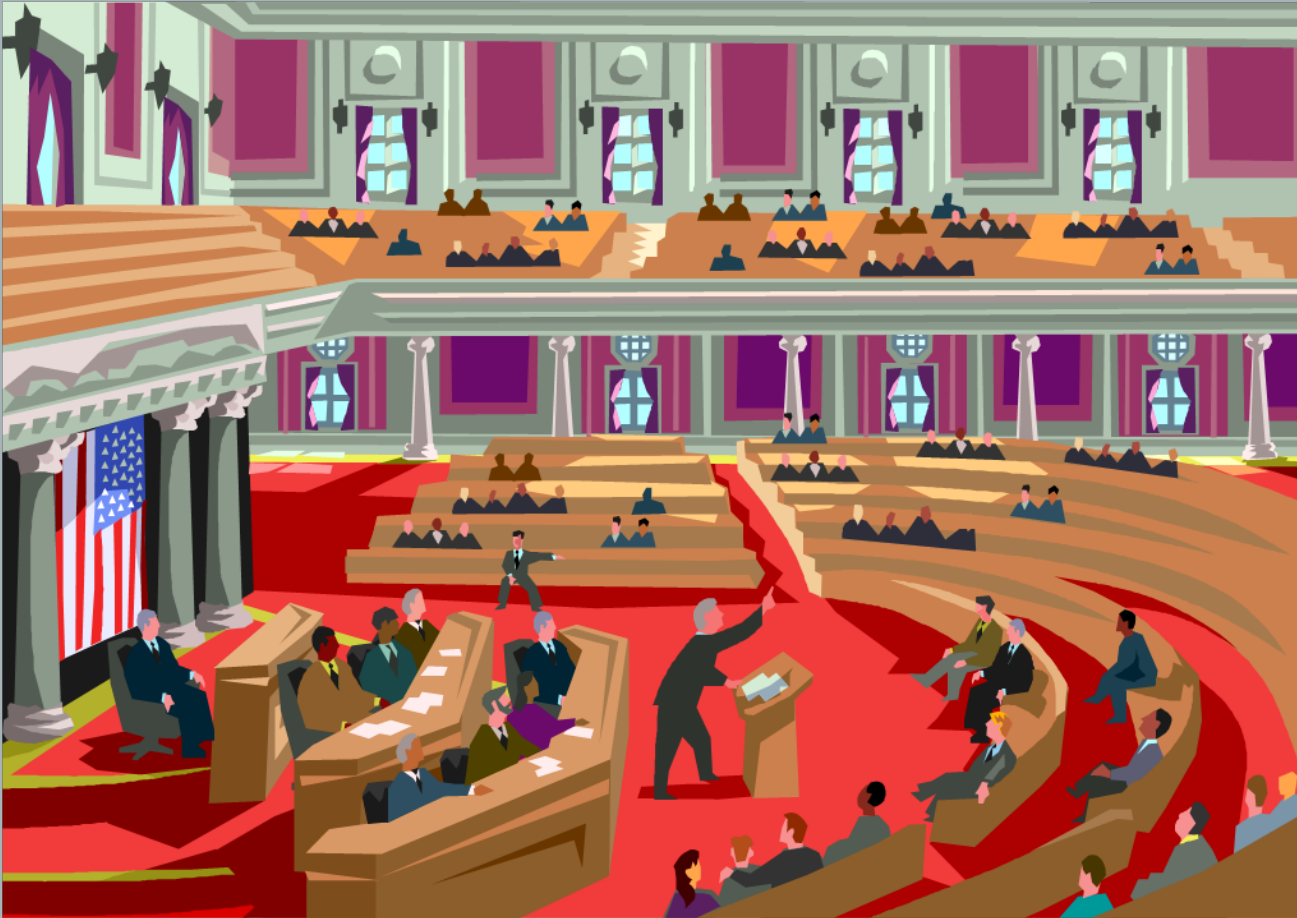


Statistics of Seafood

- ▶ **21% comes from China**
- ▶ **80% of U.S. shrimp is imported**
- ▶ **40% of seafood is aquacultured with China accounting for 70% of total world production**
- ▶ **10% of catfish is from China**



Congress is very concerned about tracing the origin of food.



Who are the leaders of food safety?

- ▶ **The Honorable Rosa DeLauro (D-Connecticut)**
- ▶ **Senator Richard Durbin (D-Illinois)**
- ▶ **The Honorable John Dingell (D-Michigan)**



What is the Congress saying about food safety?

▲ The Senate's Bill

- ▲ Seems to emphasize fruits and vegetables and the Secretary of Agriculture's role.
- ▲ Calls for a Pilot Project with processed food with emphasis on those that have been the subject of outbreaks during the previous 5 years.



What is the Congress saying?

▲ The House's Bill

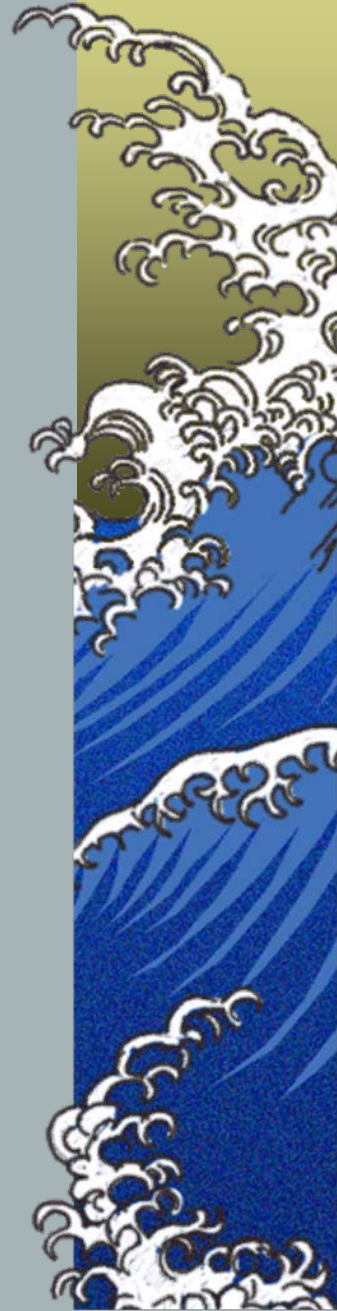
- ▲ Requires a tracing system for food located in the U.S. or for imports into the U.S. to be established.
- ▲ Requires tracing technologies for **full pedigree** will be identified and these systems will be **interoperable**.



What is the Congress saying?

▲ The House

- ▲ Pilot projects with 1 or more sectors of the food industry.
- ▲ Growers, producers, manufacturers, processors, packers, transporters, holders, and sellers must be able to trace in **2 business days**. Records must show immediate previous and immediate subsequent receiver.



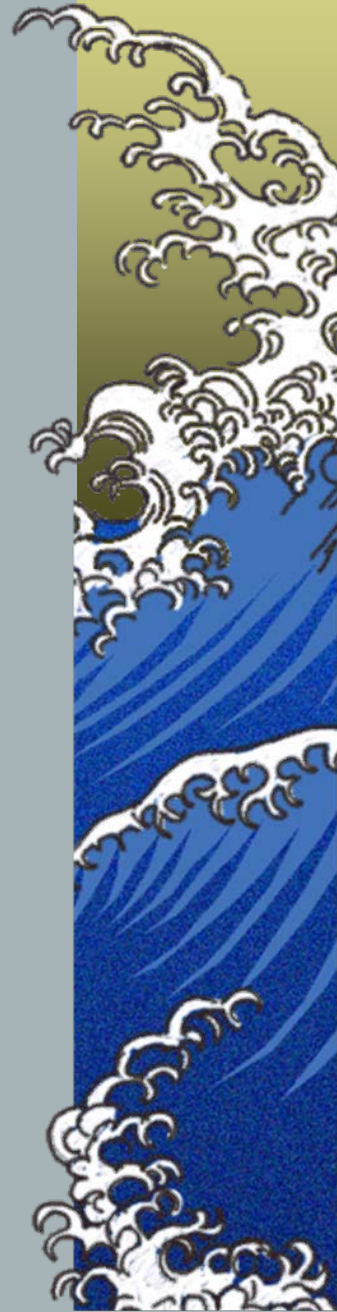
OIG Looks at Traceability in the Food Chain

- ▶ March 2009 Report on beverage, dairy, grains, and produce facilities
- ▶ **59% of the food facilities did not provide all of the required info on sources, recipients, and transporters.**
- ▶ **25% of the managers contacted were not aware of FDA recordkeeping requirements. (Retailers were the worst.)**



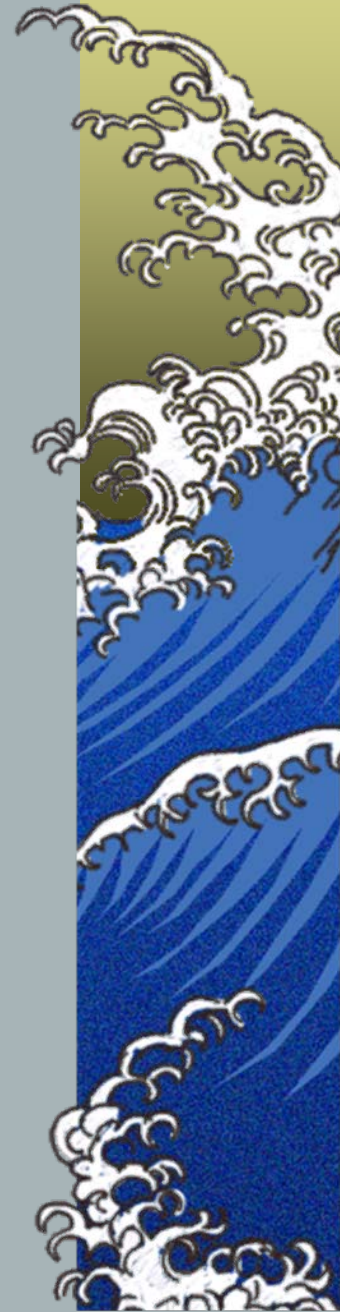
Trace-Related Laws

- ▲ **Bioterrorism Act of 2002**
 - ▲ 1 step forward and 1 step back
- ▲ **Farm Conservation and Energy Act**
 - ▲ COOL of 2005 for seafood
 - ▲ COOL of 2009 for beef, veal, pork, lamb, goat, chicken, seafood; fresh and frozen fruits and vegetables; peanuts, pecans and macadamia nuts; and ginseng.



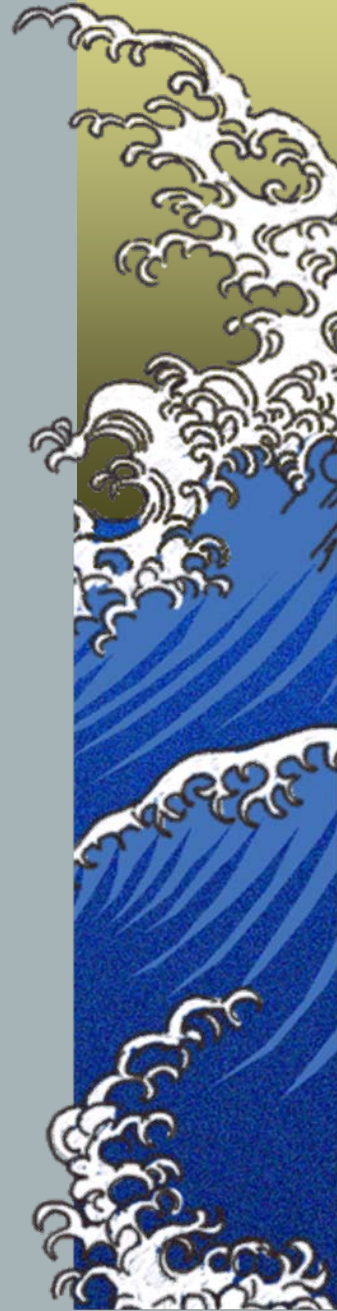
How cool is COOL?

- ▶ Does it really identify the country of origin?
- ▶ What about substantial transformation?



Other Laws

- ▶ HACCP
 - ▶ **Know your suppliers!**
- ▶ Illegal, Unreported, and Unregulated initiatives
- ▶ NOAA/NMFS Fishery Management Regulations
- ▶ USDA/Animal Plant and Health Inspection Service certification
- ▶ CBP Importer Security Filings
- ▶ FDA Reportable Food Registry



Your HACCP Plan

It's more than a certificate!

- ▶ Are you testing for *Salmonella* sp.?
- ▶ Are you using approved antibiotics?
- ▶ Any pesticides in use?
- ▶ Proper labels on packaging?
- ▶ Metal detection?
- ▶ Recordkeeping for all steps?



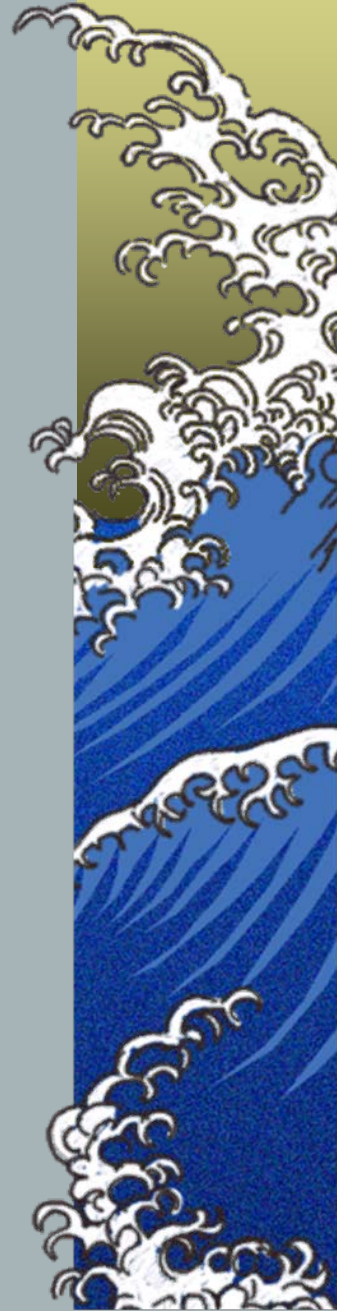
What are FDA and USDA doing about trace?

- ▶ **They are working together!!**
- ▶ **They published Federal Register Notice on November 3, 2009.**
- ▶ **They held a public meeting in December to talk about**
 - ▶ **Core elements in tracing**
 - ▶ **Gaps in tracing systems**
 - ▶ **Mechanisms to enhance systems**



NFI Thinking on Traceability

- ▶ HACCP is a good model.
- ▶ Other rules and guidance documents should be considered prerequisite programs.
- ▶ Risk based determinations
 - ▶ salt versus milk powder



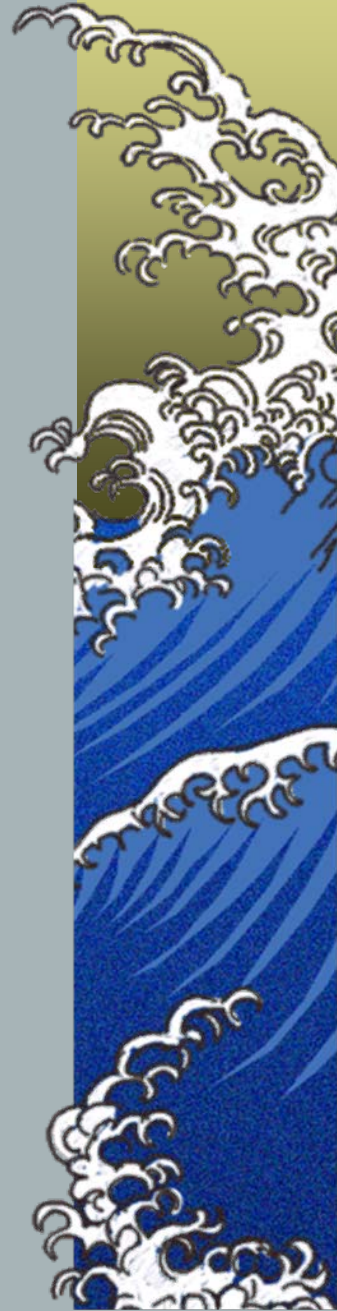
NFI Thinking on Traceability

- ▶ How to define a lot. Is it several cases, a day's worth of production, a container load at the port???
- ▶ **Recommend a maximum lot size definition based upon time.**
- ▶ How to trace raw materials purchased on the open market?
 - ▶ **Regulate finished product distribution**
 - ▶ **Industry drives consistency in supply**



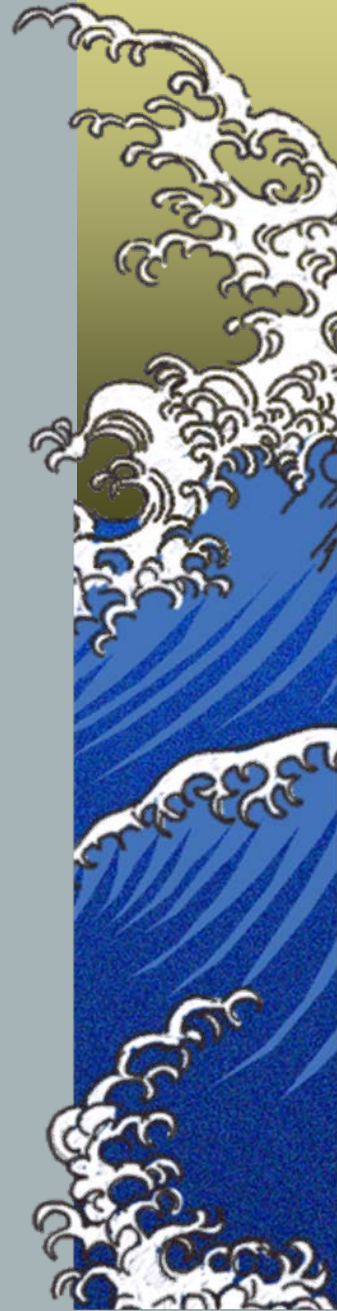
NFI recommends these Key Data Elements:

- ▶ **Minimum Requirements on each case:**
 - ▶ **Lot number and name of the manufacturing facility**
 - ▶ **Lot number, quantity, and shipping location on invoices and bills of lading**



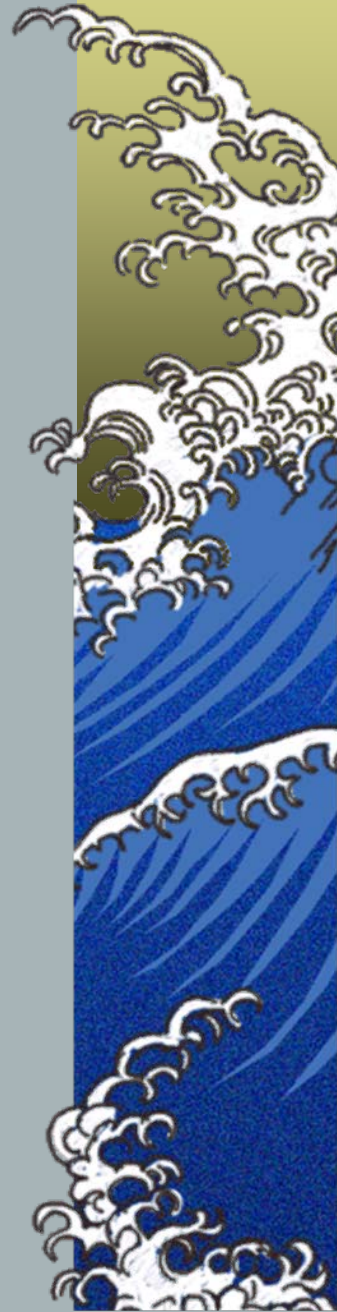
Recordkeeping

- ▶ **Maintain records for 2 years or the shelf life.**



Recordkeeping

▲ Hard copy or electronic?





About GS1 US

- A not-for-profit standards organization
- 35 years of experience – originator of the U.P.C.
- One of 108 country-based GS1 Member Organizations
- Over 1 million companies use GS1 standards to do business across 150 countries



- Representing all points in supply chain
- Over 20 represented sectors including retail food, foodservice, produce, meat/poultry, seafood, bakery and deli

- Countries with a GS1 Member Organization
- Countries served on a direct basis from GS1 Global Office (Brussels)

• www.gs1us.org



The Three Components of a Global Trade Item Number (GTIN)

1. GS1 Company Prefix

- Assigned by GS1 US or another GS1 Member Organization and uniquely identifies your company
- Derived from the U.P.C. Company Prefix

2. Item Reference

- Assigned by the holder of the GS1 Company Prefix to uniquely identify a product or service

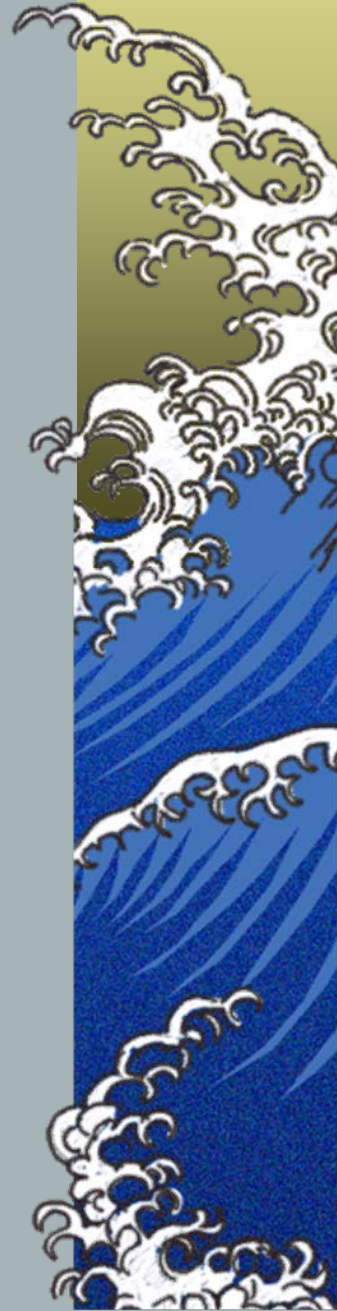
3. Check Digit

- Follows standard formula based on previous digits



NFI Trace Tiger Team

- ▲ **Presented at the FDA/USDA Public Meeting**
- ▲ **Working with GS 1 and Trace Register**
- ▲ **Commenting on the Federal Register Notice of November 2, 2009; Issues and Questions for Discussion for FDA**



Concluding Thoughts

- ▶ **Congress has not passed a food safety law.**
- ▶ **FDA and USDA have not made any decisions yet.**
- ▶ **BUT food safety is high on the current Administration's priorities and food safety is linked with traceability.**





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