



Ensuring Traceability of Fresh Produce

School Nutrition Responsibilities

In the event that produce purchased for your school nutrition program is recalled, you are responsible for tracing the produce one step back (trace back) to your supplier and one step forward (trace forward) to when and to whom it was served. Follow these tips to help you track produce in the event of a food recall:

- Maintain purchasing records for all produce. All purchasing records, typically invoices, should include lot numbers and other identifiers, such as pack date. If lot number and other critical information are not already included on the invoice, add it upon receipt.
- Maintain contact information for all suppliers, including farms, if produce is purchased directly from them.
- Label all produce so that you can identify the source and trace it back through your purchasing records. Keep produce in original packaging when possible.
- Avoid commingling produce from different sources in storage, preparation, or service.
 - ◆ If you commingle, you may not be able to identify the specific source of the produce in the event of a recall.
 - ◆ If the same product is purchased from a farm, multiple farms, or a distributor, keep the products segregated through storage and service and keep records of when each product is served.
Example: Apples are purchased from The Apple Farm and Distributor XYZ. Apples from The Apple Farm are stored separately and labeled clearly. The Apple Farm apples are not added to cases partially filled with apples from Distributor XYZ, or stored in empty cases that previously held apples from the distributor.
- Document information on the menu management/production record to enable you to trace all produce items back to your purchasing records, should a recall occur. Record information about the source of the produce--a distributor, a farm, or a school garden.
- Include information on your shipping documents if produce is prepared at one location and shipped to another location for service.
- Label repacked fresh produce containers when distributing it to schools in quantities less than a full case. This practice will facilitate trace back to its original source in your purchasing records.
- Conduct a periodic mock recall of fresh produce to test your internal tracking system. Include your distributors in the mock recall to test their internal traceability program.





Ensuring Traceability of Fresh Produce, continued

School Gardens

- Maintain a record of all produce received from school gardens that includes product/variety name, harvest date, and all persons involved in harvesting.
- Serve small quantities of produce from school gardens or a local farm to specific classes or grades to facilitate trace back. Do not commingle.

Example: Do not mix lettuce from a local farm with lettuce from a local distributor during salad preparation.

Distributor Responsibilities

- Bids or procurement documents with distributors should include selection criteria to ensure the safety and traceability of fresh produce purchased by your school district. The distributor should meet the following criteria:
- Maintain records that are in compliance with the U.S. Bioterrorism Act of 2002. These records can be used to trace fresh produce one step back and one step forward. The following information should be recorded for each produce item:
 - ◆ Supplier identity and contact information
 - ◆ Batch and lot number(s) for all produce items as they are received at the distribution facility and as they are shipped to customers. All produce that is repacked or has lot numbers changed must be traceable back to the original source.
 - ◆ Shipment dates when produce was received at the distribution facility, and when it was shipped to specific customers.
 - ◆ Contact information for all customers who receive produce.
- Ensure that any suppliers, such as packing houses and/or cooperatives, can trace back to the grower(s) in the event of a recall.
- Maintain audit documentation of Good Agricultural Practices from growers, or farms, if applicable.

Farm and Produce Cooperative Responsibilities

Farmers are responsible for tracing product back to the specific field where it was grown. If produce cooperatives receive produce from multiple farms, they should keep records that allow traceback to specific produce from each grower to specific customers. Records typically include:

- Harvest date
- Field identification
- Harvesting personnel
- Packing date
- Shipping date
- Customer records



Ensuring Traceability of Fresh Produce, continued

References

FDA, *Guidance for Industry: Guide to Minimize Microbial Food Safety Hazards for Fresh Fruits and Vegetables*, 1998

<https://www.fda.gov/regulatory-information/search-fda-guidance-documents/guidance-industry-guide-minimize-microbial-food-safety-hazards-fresh-fruits-and-vegetables>

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Institute of Food Technologists, *Resources for Product Traceability*, 2009.

<https://www.ift.org/news-and-publications/food-technology-magazine/issues/2008/june/columns/laboratory>

The Produce Traceability Initiative: <http://www.producetraceability.org/>

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