

Submitted electronically via regulations.gov

September 8, 2025

Dockets Management Staff (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Rm. 1061
Rockville, MD 20852

Re: FDA Proposes to Extend Compliance Date for Food Traceability Rule and Issues New
FAQs and Other Resources (August 6, 2025); Docket No. FDA-2014-N-0053

To Whom it May Concern:

The undersigned members of the Food & Beverage Issue Alliance (FBIA) appreciate the opportunity to comment on FDA's Proposal to Extend Compliance Date for Food Traceability Rule and New FAQs and Other Resources (FDA-2014-N-0053). Our members are grateful for the 30-month extension to the compliance date for the Food Traceability Rule.

FBIA is a coalition of 48 food and beverage trade associations representing the entire food supply chain. The food and agricultural sector is proud to be an essential part of the U.S. economy, responsible for feeding the nation and consumers worldwide. Together, our food industry member companies, and their employees, are responsible for roughly one-fifth of the country's economic impact, directly provide nearly 21.5 million jobs, totaling more than 14% of U.S. employment. The food industry has been and remains eager to deliver a safe and ample food supply, as proven during times of crisis and during more ordinary times.

Protecting consumers from potentially contaminated foods, facilitating faster recalls, and streamlining traceback investigations are priorities shared by both the food industry and the FDA. Our organizations are strong supporters of the FDA and the FDA Food Safety Modernization Act (FSMA); we support FDA fulfilling its congressional mandate under Section 204 of FSMA to develop a system within the agency for product tracing and to establish recordkeeping requirements for high-risk foods. The members of our respective trade associations have significant experience with recall and traceback investigations, as well as with recordkeeping under the Bioterrorism Act. Those experiences have shaped our perspective on the proposed rule.

While we understand the importance of traceability in ensuring food safety, we urge the FDA to consider the complexity of the rule and provide more flexibility in its implementation. It is crucial that the rule's requirements are aligned with industry capabilities and technological advancements, especially for smaller retailers, distributors, and manufacturers who may not have the technological resources to fully comply with the rule.

We believe that collaboration between industry stakeholders and the FDA is essential to address the challenges posed by the Food Traceability Rule. We are committed to working with the FDA to ensure the rule is implemented in a way that enhances food safety without placing undue burdens on businesses.

Thank you again for providing additional time for industry to comply with the Food Traceability Rule and for considering our comments. We look forward to continuing to work together to ensure the safety and security of the food supply chain.

Sincerely,

1. American Frozen Food Institute
2. American Spice Trade Association
3. FMI - The Food Industry Association
4. Independent Bakers Association
5. International Dairy Foods Association
6. International Foodservice Distributors Association
7. International Fresh Produce Association
8. National Confectioners Association
9. National Grocers Association
10. National Seasoning Manufacturers Association
11. North American Millers' Association
12. Peanut and Tree Nut Processors Association