
FAQs

What is the timeline for progress? When do you hope to be in a position to make decisions, given the compliance deadline that is rapidly approaching?

PFT is expected to begin substantive work by October 2024, with the goal of aligning industry efforts before the compliance deadline of January 2026. The partnership aims to make key decisions and coordinate industry efforts as soon as the launch phase is completed. Given the urgency, we believe the current deadline will help catalyze the work of the partnership, and PFT will likely accelerate decision-making processes to ensure that participating companies are well-prepared ahead of the deadline.

In addition, the consensus vision PFT seeks to develop and advance extends well beyond January 2026. We recognize that FSMA 204 does not require electronic interoperability, although it is also recognized that business and commercial dynamics are moving the industry in that direction. The PFT vision for interoperability will incorporate FSMA 204 compliance and will simultaneously recognize that work on optimization and interoperability will continue well beyond the January 2026 compliance deadline, as companies and trading partners potentially realize operational efficiencies or other emergent ROI propositions. These efforts will also include considerations of including small businesses as part of any interoperable solutions.

Immediately upon launch, PFT will develop concrete work plans that include specific timelines for progress. Each Committee and Work Group will be supported by a written charter including, among other things, critical milestones for their success.

What benefit is there in being a member of the PFT? Why should a company join as a dues-paying member?

Becoming a member of PFT offers a strategic advantage that goes beyond compliance with the FSMA traceability rule. As a member, you gain direct influence on how traceability systems are developed and implemented, ensuring they align with both regulatory requirements and your business needs. PFT provides unique access to collaboration with the FDA, allowing you to contribute to systems that are efficient and effective, while understanding the Agency's technical interpretation of the rule.

Membership also offers the chance to network and collaborate with a diverse group of stakeholders across the food supply chain. By sharing best practices and learning from industry-wide approaches, your company can innovate and improve its traceability processes. This collaboration leads to greater operational efficiency, reducing duplication of efforts and lowering compliance costs, ultimately providing long-term cost savings.

In addition to these practical benefits, joining PFT positions your company as a leader in food safety and traceability. The insights gained through PFT membership will keep you ahead of industry trends, helping you shape the future of food traceability. In essence, PFT membership is an investment in your company's future, ensuring that you play a key role in advancing safer, more transparent food supply chains that align with your company's needs.

How will PFT documents and materials be made available? Will these materials be available only to members behind a paywall?

PFT documents and materials will be made freely available to the public on an open-source basis, ensuring broad access to these resources. This approach reflects PFT's commitment to promoting food safety and traceability across the entire industry. While members of PFT will benefit from direct involvement in the creation and refinement of these materials, as well as access to additional resources

and opportunities, the output documents themselves will not be restricted behind a paywall. By making these materials freely accessible, PFT aims to support widespread compliance with FSMA requirements and encourage best practices throughout the food supply chain.

Will this replace existing workgroups and collaborations?

No. Existing workgroups and collaboratives are doing great work to advance important components of food traceability, and this organization will not seek to duplicate or displace their efforts. To the maximum extent possible, the organization will seek to incorporate the work of other forums by reference—with full due credit to those other forums—into one overarching, comprehensive vision for traceability. The governance body will focus on (1) bringing disparate pieces of work on traceability together into one comprehensive vision, and (2) developing new requirements and recommendations only where existing work is not already underway.

How does PFT plan to align with a number of trade associations across the sectors, many of which already have workstreams in place?

Trade associations are critical voices and have a unique ability to represent broad sets of stakeholders. PFT will not replace their important work, but rather will provide a common space for their work to be integrated with the work of other sectors or industries in the supply chain.

PFT plans to align with existing trade associations by serving as a coordinating body that integrates and harmonizes ongoing workstreams across sectors. This could include benchmarking against existing initiatives and ensuring that the partnership's activities complement rather than duplicate efforts. PFT will also facilitate communication and collaboration among its members, many of whom may belong to multiple organizations, to ensure consistency and coherence in traceability practices.

It is also important to recognize that the purpose and work of a public-private partnership is very distinct from that of a trade association. Trade associations are, first and foremost, advocates for their members and industry. As a public-private partnership, PFT is not intended to advocate specific policy positions; rather, it is a *collaboration with* FDA and other regulators that enables the joint creation of a shared vision for traceability.

How will PFT address the fact that many individual companies up and down the supply chain use competing and/or different systems/procedures to track ingredients, finished products, etc.?

PFT plans to address the challenge of varying systems and procedures across the supply chain by developing consensus business and functional requirements that accommodate different systems while promoting interoperability. This effort will be supported by dedicated work groups focused on specific aspects of traceability, such as data sharing and small business integration. The aim is to ensure that the transition to interoperable systems is as smooth as possible, allowing companies to continue using their existing systems while meeting new traceability requirements.

Is this a standards body?

No, the governance body is not a standards development organization (SDO). It will focus on the development of compliance, business, and functional requirements—a layer between individual companies' legal and compliance decisions and technical standards. The governance body may (likely will) recognize existing standards and/or call for SDOs to develop new standards, but it does not plan to develop technical standards itself.

Where do representatives from Certification Bodies fit into PFT membership?

Certification Bodies could fit within the PFT structure as Technical Expert Members and thereby participate in the Committees and Work Groups that focus on developing and documenting business and functional requirements for traceability. Their role could be critical in ensuring that the traceability systems developed are certifiable and meet both regulatory and industry standards. They could also contribute to discussions on interoperability and best practices, given their experience in auditing and certifying compliance with food safety regulations and technology systems.

It is also important to recognize that membership is not the exclusive mechanism for engaging with PFT. The PFT Board is empowered to establish additional mechanisms for engagement with organizations that do not fit neatly into a membership category. PFT may also host workshops that are open to non-members or solicit written input on drafts from non-members.

Does FDA have authority under FSMA to require interoperability of food tracing key data elements?

FSMA does not explicitly mandate interoperability of food tracing key data elements, but PFT recognizes that interoperability is likely critical for the success of traceability efforts. Individual businesses have recognized the importance of interoperability and are increasingly requiring interoperability as a *commercial* requirement. We believe interoperability should continue to be advanced through the commercial market—not through regulatory mandate—and we aim to support the reality that the commercial market is doing so. The partnership is designed to work closely with the FDA as a technical partner, and with feedback from the agency and other stakeholders, develop systems that promote interoperability, even if it is not a strict regulatory requirement.

Will PFT be involved in actual individual tracebacks?

At this time, there is no role envisioned for PFT in individual tracebacks as these are conducted under FDA and state regulatory authority. However, PFT is ultimately an industry organization managed by the industry. If the industry determines there is an important role an independent nonprofit organization can play in sharing information and best-practices related to tracebacks, the industry has the ability to position PFT to do so in the future.

How will PFT be organized? Is it part of Leavitt Partners or The Acheson Group (TAG)?

PFT is being established as an independent Delaware nonprofit and will seek 501(c)(6) tax exempt status. The organization will be managed by a Board of Directors drawn from the industry and trade association membership of PFT. Leavitt Partners and TAG have supported the development and launch of PFT on a voluntary basis and will serve as staff and facilitators of PFT's work.