



PARTNERSHIP FOR FOOD TRACEABILITY

*A non-profit partnership to advance a shared
vision for enhanced food traceability*

October 2025

This Membership Prospectus details the structure and membership terms of the Partnership for Food Traceability (PFT), a non-profit partnership and independent, sector-neutral forum for stakeholders—industry, regulators, and their technology vendors—to jointly define a shared comprehensive vision for enhanced food traceability.

PFT was developed collaboratively by stakeholders throughout the supply chain. The organization provides an overarching vision for food traceability, enabling implementation of compliant traceability systems. Section 204 of the Food Safety Modernization Act (FSMA) and FDA's associated [Final Rule](#) require enhanced traceability and recordkeeping requirements for organizations that manufacture, process, pack, or hold [certain foods](#) on FDA's food traceability list (FTL). While the Final Rule does not require electronic traceability, it aligns with and is supported by FDA's New Era of Smarter Food Safety initiative, which aims to harness technology and data to advance food safety and traceability. In parallel, food companies increasingly require electronic traceability as a commercial requirement. Collectively, these requirements have created tremendous momentum toward electronic traceability and simultaneously highlighted the complexities and cross-sector interdependencies that must be overcome to achieve that goal.

All stakeholders are encouraged to participate in PFT. A diversity of members—industries, sectors, company sizes, business models—is needed to define a comprehensive vision for traceability that truly works for everyone.

This prospectus will help you evaluate membership in PFT. For questions or additional information, email Laura Brown at Laura.Brown@leavittpartners.com or visit www.PFTraceability.org.

To apply for PFT membership or request additional information, please complete the membership form or Stakeholder Interest Form at www.PFTraceability.org.

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Membership Prospectus

The Partnership for Food Traceability (PFT) is an independent, sector-neutral nonprofit partnership developing a shared, overarching vision for food traceability across the supply chain, allowing for streamlined implementation of compliant traceability systems. PFT's membership includes producers (including growers and harvesters), manufacturers and processors, distributors (including packagers, wholesalers, holders, and shippers), retailers and grocers, and restaurants across diverse commodities (including produce, seafood, cheese, packaged, and prepared food). Membership includes industry members, trade associations, technology vendors, and technical experts. Together, members are working to establish a comprehensive vision for enhanced food traceability in the U.S.

The ability to exchange, gather, and use traceability data among supply chain partners is essential to the effective and efficient implementation of enhanced food traceability. This requires a level of **cooperation, coordination, and interconnection** not present in the supply chain today, and PFT is designed to meet that need.

PFT is delivering tremendous value to the industry in multiple ways. It is providing:

- A **decision-making mechanism** for critical questions of how traceability should be implemented.
- A forum for **technical implementation discussions** between **industry and FDA**.
- A **common vision** for traceability across sectors, industries, associations, and consortia.
- A **consistent set of business and functional requirements** for traceability that provides clarity to solution providers and ensures solutions meet business needs.
- An organized **supply chain wide plan** for how the industry will **migrate** to enhanced traceability.

On March 20, 2025, [FDA Announced](#) that it will extend the traceability rule compliance date by 30 months. While this announcement allows companies more time to achieve compliance, enhanced traceability for FTL foods will still be required. The delay puts a premium on PFT's work by allow PFT adequate time to design interoperable cross-industry, cross-sector traceability systems while still providing an adequate window for implementation of that vision. In the announcement, FDA notes that it also intent to use this additional time for compliance to continue participating in cross-sector dialogue, which is what we're doing here at PFT.

It is important to note PFT will not displace existing work groups and consortia nor the important work they do; rather, PFT aims to bring the work of those distinct groups together into one comprehensive vision for traceability. For additional information, visit www.PFTraceability.org.

What is the purpose of Partnership for Food Traceability?

PFT is establishing an intentional, sector-inclusive implementation plan to advance a shared vision for traceability and will provide certainty and longevity that benefits the effective, efficient implementation of enhanced food traceability. It provides a **place for engagement** between sectors within the supply chain, which, understandably, have independent interests in how traceability is implemented.

The primary objective is to facilitate implementation of compliant traceability programs and the adoption of **interoperable electronic traceability** systems for FTL foods throughout the United States *while maintaining the flexibility to accommodate and support alternate and non-electronic methods for small businesses*. An interoperable framework will support all foods, allowing individual companies to determine their level of adoption beyond FTL foods as they and their commercial partners desire.

PFT's work is not dependent on any one specific technical vision for how interoperability should be achieved. The specific technical vision to be advanced by PFT will be determined *by PFT members* in a manner that promotes balance and equitability. The partnership will recognize and incorporate existing technical standards that enable interoperability throughout the supply chain, but will not independently develop technical standards.

The partnership will also function as a repository for industry-defined requirements, best practices, frameworks, and traceability pilots. PFT is creating transparency, alignment, consistency, and harmonization of practices and requirements for traceability implementation throughout the supply chain while maintaining individual business flexibility and autonomy within those harmonized frameworks. The defined requirements will enable compliance with FSMA 204 and the associated Final Rule, among other traceability initiatives.

Regulators also play an essential role in both helping to define requirements for food traceability and as a recipient of food traceability information. FDA has formally agreed to collaborate with industry through the PFT as a forum in which stakeholders can work together, with FDA's technical assistance and advisement, to coordinate food traceability approaches across diverse supply chain sectors and help to effectively remove potentially contaminated products from the market more rapidly. State and local regulators, as well as public health authorities, are also engaging with PFT.

What does Partnership for Food Traceability do?

PFT is a sector-neutral forum where all stakeholders can come together with an equal voice to advance enhanced traceability. PFT is:

Defining open-source consensus business requirements and functional requirements for food traceability. PFT's specific technical vision is being determined through decision-making mechanisms that promote balance, sector-neutrality, and equitability. PFT is leveraging and incorporating existing work from the various sectors of the food industry to the maximum extent practical. PFT strives not to compete with or duplicate existing and ongoing efforts, but rather to create one comprehensive overarching framework to bring this sector-based work together.

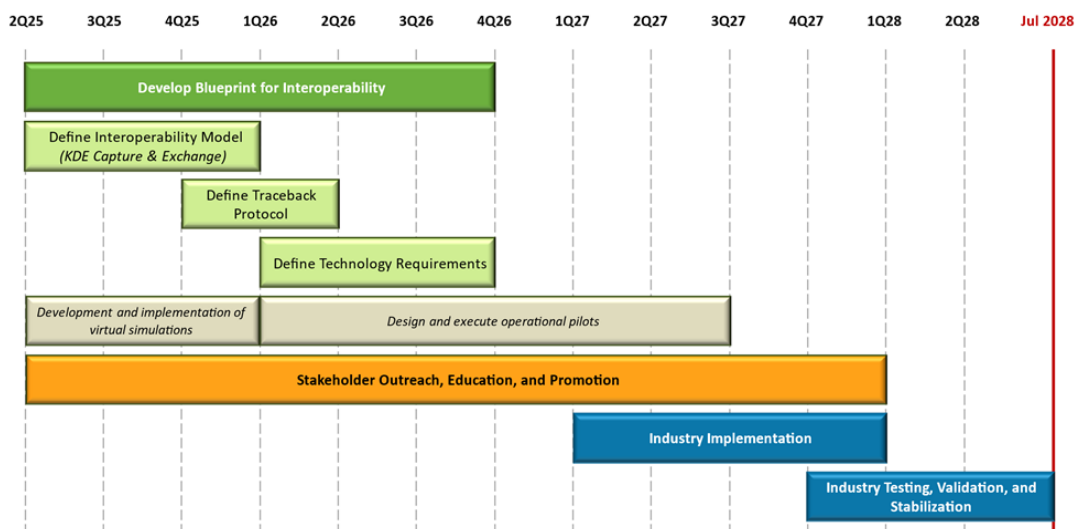
Coordinating pilots and sharing pilot learnings to advance electronic traceability. PFT provides a forum to (i) consolidate learnings from private and public pilots, (ii) identify the need for, and coordination and planning of, new pilots, and (iii) promote industry-regulator interactions through pilot activity. PFT is also developing and operating pilots and simulations to fill gaps not addressed by other stakeholders.

Providing a forum for the sharing of common practices in setting supplier requirements for data sharing. PFT strives to ensure its consensus business and functional requirements build on, and limit disruption to, supplier requirements. Each company remains free to establish its own customer and supplier requirements, but PFT will promote more consistent and interoperable requirements by providing a forum for the discussion and identification of promising practices.

In addition, the consensus vision PFT is developing and advancing provides value beyond compliance. We recognize that FSMA 204 does not require electronic interoperability, although most recognize it is a business necessity. The PFT vision for interoperability will incorporate FSMA 204 compliance and will simultaneously recognize that work on optimization and interoperability will be key for industry, 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.

Given FDA's 30-month extension of the FSMA 204 compliance date, PFT has developed a timeline for development of a blueprint for interoperability that includes the development and execution of operational pilots to inform industry implementation:

PFT Timeline for Progress



Who can participate in the Partnership for Food Traceability?

General Members

Full, **voting membership** in PFT (and therefore decision-making and voting authority) is reserved for industry members and their trade associations. As the organizations with primary compliance responsibilities under FSMA 204, these organizations are the primary decision-making members. PFT membership is a corporate membership, and each General Member represents one vote, but an unlimited number of employees may engage in PFT.

General Membership categories:

- (i) Industry Members – entities that manufacture, process, pack, or hold foods (as defined in the Federal Food, Drug, and Cosmetic Act). Industry members will designate their most relevant “Sector Category” upon joining, which include:
 - a. **Producers** (including growers, harvesters, and fishers),
 - b. **Manufacturers and processors,**
 - c. **Distributors** (including packagers, wholesalers, holders, shippers, brokers, and importers),
 - d. **Retailers and grocers, and**
 - e. **Restaurants.**
- (ii) Association Members – trade associations, societies, and similar membership organizations, the membership of which consists primarily of industry members.

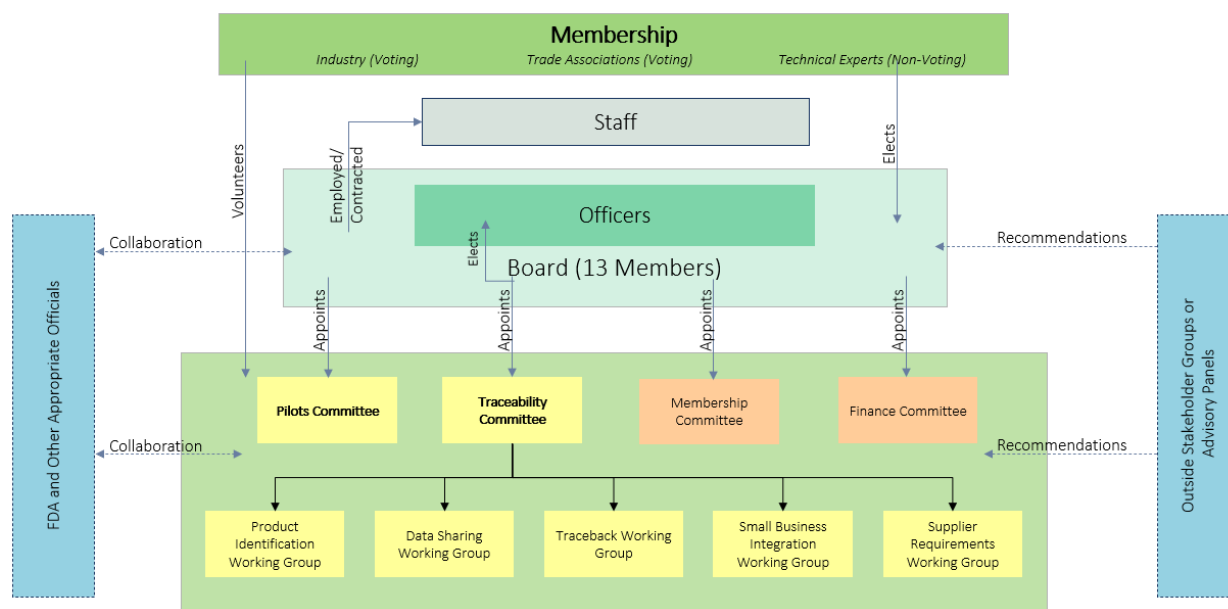
Technical Expert Members

Non-voting membership is extended to technology providers, vendors, service providers, and other technical experts, such as consultants and law firms. It is recognized that these organizations are valuable and necessary for successful implementation of enhanced food traceability. For example, technology solution providers have deep expertise in the systems necessary to achieve interoperability and are essential to implementation. PFT membership is a corporate membership, but an unlimited

number of employees may engage in PFT. Technical Expert Members have the right to participate in committees and work group meetings but do not have the right to vote on PFT decisions, as that power is reserved for those with FSMA compliance obligations.

How is the organization structured?

PFT is an independent, nonprofit organization. Its structure is generally depicted below:



Board Members

PFT is governed by a 13-member Board of Directors, which is elected by the General Membership and is responsible for the executive management of the organization. PFT relies heavily on committee activity to carry out the substantive work of the organization.

The Board of Directors serves in an executive function, managing the operational and business aspects of the organization, as well as the strategic direction of the organization. The 13 Board seats are held by individuals serving staggered two-year terms in their capacity as an employee/contractor of a specific Industry Member or Association Member (*i.e.*, if the elected individual leaves his/her organization, the individual would not retain the seat). Board seats are allocated as follows:

- **Two representatives of each of the following sector categories:**
 - Producer/Grower/Harvester (industry or association)
 - Manufacturer/Processor (industry or association)
 - Distributor/Packager/Holder/Wholesaler/Shipper (industry or association)
 - Retailer/Grocer (industry or association)
 - Restaurant (industry or association)
- **Three At-Large Board Members:**
 - No more than two at-large Board Members can be from the same sector

Board Member selection and election occurs as follows:

- **Sector Board Members:** Members from each sector vote for the Board representatives for their respective sector (*i.e.*, Producer members vote for Producer Board members, Restaurant members vote for Restaurant Board members, etc.).

- **At-Large Board Members:** The three At-Large Board members are elected by a vote of the full General Membership (*i.e.*, General Members across all sectors vote for all At-Large Board members).

In addition to member nominations/self-nominations, a Nominating Committee drawn from current Board members will strive to ensure the Board represents a balance of industry and associations, a diversity of company sizes, and at least the following commodities at all times:

- Produce
- Seafood
- Shell Eggs
- Cheese
- Nut Butters
- Deli Salads

Committees

Committees are where substantive discussions take place and where General Members and Technical Expert Members all participate in framing the traceability efforts of PFT. Committees are open to all Members. Technical Expert Members may also participate in the Traceability Committee and the Pilots Committee, including all associated Working Groups.

The following committees have been established:

- **Traceability Committee:** The Traceability Committee is where substantive discussions and definition of PFT's shared vision for traceability are taking place. The primary charge of the Traceability Committee is to develop and document comprehensive, consensus business requirements and functional requirements for electronic traceability. The work of the Traceability Committee is supported and expedited through Work Groups, which delve into specific areas of need.
- **Pilots Committee:** Serves as a coordination point for industry pilots that support the advancement of electronic traceability. The Pilots Committee works closely with the Traceability Committee to ensure its work supports the development of consensus business and functional requirements. The primary focus of the Pilots Committee is (i) consolidating learnings from pilots, and (ii) supporting the coordination of new pilots to avoid duplication and support of consensus. The Pilots Committee is also developing and operating pilots to fill existing data gaps. Pilot Committee work is also supported through Work Groups.
- **Finance Committee:** Responsible for the financial planning of PFT, including development of a proposed annual budget and membership dues table for Board consideration and approval.
- **Membership and Engagement Committee:** Responsible for the development, recruitment, and retention of PFT Members. The Membership and Engagement Committee will develop the application for membership, policies and procedures surrounding membership, and identify and develop outreach, engagement, and educational opportunities.

How do FDA and other state and local officials engage with PFT?

A vital aspect of PFT is engagement with regulators, including FDA and state and local officials. FDA and other officials have formal, non-voting participation in all full membership meetings as well as committees and work groups (other than the Finance Committee). They serve as technical advisors to provide perspectives on regulations, guidance documents, policies, and practices. Both industry and public officials are expected to share information to learn from each other.

The PFT Board holds quarterly meetings with FDA and other officials. These meetings will focus on the structure and function of the organization, rather than on the substantive technical work of committees.

Due to the nature of the organization, PFT does not take or advocate for policy positions. In addition, FDA and other officials will not participate in any financial or legal functions nor any decisions relating to PFT.

How are PFT decisions made?

All substantive work to define the collective vision for traceability takes place through the PFT committees and the work groups within them. PFT committees generally operate by consensus. Prior to publication, all final requirements, specifications, and other substantive documentation must be approved by the General Membership.¹ The decision-making process is critical to ensure all PFT decisions and documentation are broadly supported and reflect a cross-sector, cross-industry viewpoint. To that end, all documentation must be approved by both (i) a two-thirds majority of the overall General Membership, and (ii) a simple majority of the General Members within each of the five individual sectors.

What is the cost of membership in PFT?

Currently, PFT is funded by membership dues. The long-term funding model may include other funding streams, such as certification programs or external programs. However, the substantive output of PFT will be open source.

Membership dues are tiered based on company size to limit barriers to entry for smaller businesses. *Members may exclude non-food revenue for purposes of determining their applicable tier.*

	Tier Definitions (by revenue)						
	Producer / Grower / Harvester / Seafood	Manufacturer / Processor	Distributor / Packager / Holder / Wholesaler / Shipper	Retail / Grocer	Restaurant	Association	Technical Expert
Tier 1	>\$100m	>\$1b	>\$1b	>\$1b	>\$1b	>\$20m	10+ Employees
Tier 2	\$10m-100m	\$100m-1b	\$100m-1b	\$100m-1b	\$100m-1b	\$7-20m	
Tier 3	<\$10m	<\$100m	<\$100m	\$50-\$100m	\$50-\$100m	\$1-7m	
Small Business	<100 Employees	<100 Employees	<100 Employees	<\$50m	<\$50m	<1m	<10 Employees

¹ General Members have the right to approve substantive documents that have a significant impact on traceability. Documentation that does not have a significant impact on traceability, such as technical clarifications or updates necessary to align with referenced standards, can be made by approval of the Board alone.

2026 Membership Dues

****All new members receive 50% off their 2026 membership dues!***

	2026 Annual Membership Dues Rates*						
	Producer / Grower / Harvester / Seafood	Manufacturer / Processor	Distributor / Packager / Holder / Wholesaler / Shipper	Retail / Grocer	Restaurant	Association	Technical Expert
Tier 1	\$7,500	\$20,000	\$20,000	\$20,000	\$20,000	\$2,500	\$7,500
Tier 2	\$3,500	\$12,000	\$12,000	\$12,000	\$12,000	\$1,000	
Tier 3	\$1,000	\$2,000	\$2,000	\$2,000	\$2,000	\$500	
Small Business	\$500	500	500	500	500	\$250	\$2,500

The budget supported by these dues rates is detailed in [Appendix A](#).

2026 Member Referral Program

Our membership referral program is designed to reward current PFT members for bringing new organizations into our community. By leveraging the networks and relationships of existing members, we aim to grow our membership base organically while providing tangible value back to those who help us expand. Each referral demonstrates the importance of this endeavor to our community and reinforces our commitment to collaboration and shared success.

When a referred organization becomes an approved, paying member, the referring member earns a 15% discount on their own annual dues. The discount is capped at the total dues paid by the new member for each referral. For example, if a Tier 1 manufacturer with dues of \$20,000 refers another Tier 1 manufacturer, the referring manufacturer would receive a \$3,000 discount. However, if that same manufacturer referred a small business member with dues of \$1,000, the referring manufacturer would receive a discount of \$1,000. Each member can receive discounts for up to the full amount of their membership dues.

To receive the discount, new referrals must reference the member company and main point of contact by name on their application. Please reach out to PFT staff with any questions about this program.