



Comments Made at FDA/FSIS Public Meeting  
December 10, 2009

Good afternoon.

My name is Cristian Barcan and I am here today representing the Traceability Institute as one of its founders.

We salute the initiative of FDA and FSIS to organize this public meeting and to gather feedback from the industry – thank you again for listening.

At Traceability Institute we help equip food supply chain participants with information and knowledge to make their own decisions on how to perform traceability. Ensuring benefits, value, and sustainable business practices from traceability for our clients is our main objective. We employ some of the best global traceability experts that bring to the table decades of combined experience to help us support the market with our mission.

Ladies and gentlemen, let's not forget why we are here today: to create a better food safety system for the consumers, ourselves, our families and our children. We have a historical opportunity – perhaps the only chance we have for a while – to create a framework for an effective and efficient national recall management system for the benefit of all of us.

We cannot ignore that with a one-up one-down traceability mandate in place it took months and hundreds of millions of dollars to deal with the tomatoes and spinach recalls. Consumers lose faith in the safety of the supply chain when we end up taking away an entire product from the shelf for weeks because we have no clue which batch is contaminated. It is unacceptable from the consumer perspective to call the food supply chain safe when we have no idea how the food products end up on the shelf because it is the responsibility of the previous member of the supply chain.

Food safety has a proactive and reactive side. The proactive side deals with HACCP, GAP, GMP, etc. The reactive side of food safety is traceability.

It is the position of the Traceability Institute that the market sector – both public and private -- needs to understand before anything else that *traceability without interoperability* among the members of the supply chain has no meaning and no value.

Documentation and records keeping do not provide traceability – they enable it, but further steps are needed to achieve traceability.

Barcodes, RFID tags, and labels do not provide traceability. They help identify products more effectively and, if done at batch level, they help perform traceability faster and more accurately.

What gives traceability, is the ability to link the history of a product to the previous and subsequent steps in the supply chain.

Requiring supply chain members to deliver traceable data upon request in 24 hours is not enough. Someone (FDA, FSIS) still needs to link the dots manually. This process is tedious and takes a lot of time and resources. Two weeks to identify an issue is not fast enough when you have potential contaminated product on the shelf.

Arguing that traceability is sometimes a major challenge because of continuous manufacturing processes or blending, is a process reengineering or records keeping issue, not a traceability issue.

There are many ways – easy and inexpensive – to connect the small businesses involved in the chain. Cooperatives and associations can do the record keeping / data entry job for them if needed.

Interconnectivity between systems is mandatory to achieve whole-chain traceability - it is for this purpose that Traceability Institute is organizing a Traceability Interoperability Summit in January 21-22 in Denver, CO to enable discussions among vendors and food supply chain members on how to deal with interoperability.

We have the technologies and the means to do this today. All we need is agreement and communication.

Thank you.

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