The National Restaurant Association has created this Restaurant Traceability Evaluation Tool to help restaurants determine to what degree and what steps will be necessary to follow the FDA’s Traceability Rule.

It is important for a restaurant to know how the rule may impact current business practices long before the January 2026 deadline, as most restaurants will need time to figure out the best way to meet the new requirements and get solutions in place.

The Food & Drug Administration’s (FDA) Traceability Rule aims to track food through the entire supply chain up to the point it is given to a consumer.

This new regulation requires that restaurants have a food tracking plan, recordkeeping and communicate specific information if their menu includes any of the foods on the FDA’s Food Traceability List (FTL). The FDA says that the foods on the FTL are more frequently associated with making customers sick.

The FDA believes that following this rule will result in faster speed:

- to accurately identify which food(s) may be causing illness resulting in less marketplace confusion, harm, and waste
- to track and remove contaminated food from the marketplace to minimize customer illness or death
- to improve foodborne illness prevention strategies
- to create a uniform set of requirements to track food items
- to reduce coordination challenges between different types of food businesses and regulators

Note: This is not a legal counsel. This decision making tool has been created to help determine if your restaurant will need to follow the FDA’s traceability rule.
Do you sell food to the public or does your restaurant have a central kitchen that ships food to other restaurants or businesses that sell it to the public?

YES  NO
Do you sell food to the public or does your restaurant have a central kitchen that ships food to other restaurants or businesses that sell it to the public?

YOU ANSWERED: YES

Are any of these Food Traceability List (FTL) foods on your menu or part of meals that you make?

- SOFT CHEESES
- FRESH LEAFY GREENS
- TOMATOES
- FRESH CUT FRUITS
- NUT BUTTERS
- FRESH HERBS
- FRESH CUCUMBERS
- FRESH PEPPERS
- SHELL EGGS
- FRESH MELONS
- SPROUTS
- FRESH TROPICAL TREE FRUITS
- FINFISH
- SMOKED FINFISH
- FRESH CUT VEGETABLES
- READY-TO-EAT DELI SALADS
- CRUSTACEANS
- MOLLUSCAN SHELLFISH, BIVALVES

Please visit Restaurant.org/Traceability for the latest information, tools, and guidance about the FDA’s Traceability Rule.
Do you sell food to the public or does your restaurant have a central kitchen that ships food to other restaurants or businesses that sell it to the public?

YOU ANSWERED: NO

You are **NOT** required to follow the FDA’s Traceability Rule at this time. However, if at any time the answer to this question changes, you will need to follow the FDA Traceability Rule.
Are any of these Food Traceability List (FTL) foods on your menu or part of meals that you make?

YOU ANSWERED:

- SOFT CHEESES
- FRESH LEAFY GREENS
- TOMATOES
- FRESH CUT FRUITS
- NUT BUTTERS
- FRESH HERBS
- FRESH CUCUMBERS
- FRESH PEPPERS
- SHELL EGGS
- FRESH MELONS
- SPROUTS
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You are **NOT** required to follow the FDA’s Traceability Rule at this time. However, if at any time the answer to this question changes, you will need to follow the FDA Traceability Rule.

Please visit Restaurant.org/Traceability for the latest information, tools, and guidance about the FDA’s Traceability Rule.
Are any of these Food Traceability List (FTL) foods on your menu or part of meals that you make?

- Soft Cheeses
- Fresh Leafy Greens
- Tomatoes
- Fresh Cut Fruits
- Nut Butters
- Fresh Herbs
- Fresh Cucumbers
- Fresh Peppers
- Shell Eggs
- Fresh Melons
- Sprouts
- Fresh Tropical Tree Fruits
- Finfish
- Smoked Finfish
- Fresh Cut Vegetables
- Ready-to-Eat Deli Salads
- Crustaceans
- Molluscan Shellfish, Bivalves

You answered: **YES**

Are your annual food sales more than $250,000?

- **YES**
- **NO**

Please visit Restaurant.org/Traceability for the latest information, tools, and guidance about the FDA’s Traceability Rule.
Are your annual food sales more than $250,000?

YOU ANSWERED: NO

You are NOT required to follow the FDA’s Traceability Rule at this time. However, if at any time the answer to this question changes, you will need to follow the FDA Traceability Rule.

Please visit Restaurant.org/Traceability for the latest information, tools, and guidance about the FDA’s Traceability Rule.
Are your annual food sales more than $250,000?

YOU ANSWERED: YES

Do you buy food from a distributor or supplier?

- YES
- NO
Do you buy food from a distributor or supplier?

YOU ANSWERED: **YES**

You may need to follow the FDA’s Traceability Rule. At minimum you will need to have a Traceability Plan and keep records of the FTL foods you receive.

Please visit Restaurant.org/Traceability for the latest information, tools, and guidance about how to comply with the FDA’s Traceability Rule.

**In addition, if your restaurant:**

- Purchases food from a grower, you are required to:
  1. Document the name and address of the farm(s) you purchase from.
  2. Document type(s) of food you purchased from the farm(s).
  3. Maintain the records for 180 calendar days. *Time/Date Calculator Online Tool* can help.

**Sample record:**

<table>
<thead>
<tr>
<th>Name of Farm</th>
<th>Farm Address</th>
<th>Type of Food Received from Farm(s)</th>
<th>Date Received</th>
<th>Deletion Date of Record</th>
</tr>
</thead>
<tbody>
<tr>
<td>Johnson Farm</td>
<td>125 Farm Rd Columbus, OH 30197</td>
<td>Spinach</td>
<td>6/28/2023</td>
<td>12/25/2023</td>
</tr>
</tbody>
</table>

- Occasionally makes purchases from another provider outside of your normal purchase process OR if your restaurant provides food to other food providers, you are required to:
  1. Maintain a record of the purchase for two years*
  2. Record of purchase must include: Product purchased, Date of Purchase, Seller Name/Company and Seller Address

**Sample record:**

<table>
<thead>
<tr>
<th>Date of Purchase</th>
<th>Name of product</th>
<th>Seller / Company Name</th>
<th>Seller Address</th>
<th>Record Deletion Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>7/4/2023</td>
<td>Red pepper</td>
<td>Sam's Club</td>
<td>125 Joliet Rd Hodgkins, IL 60525</td>
<td>7/4/2025</td>
</tr>
</tbody>
</table>

*Note: If your restaurant does not have food sales of more than 1 million, you may provide the information in a form other than an electronic sortable spreadsheet. (ex: Sales receipts)
Do you buy food from a distributor or supplier?

YOU ANSWERED: NO

Do you buy direct from a grower?

YES ✓ NO
Do you buy direct from a grower?

YOU ANSWERED:

YES

You are NOT required to follow the FDA’s Traceability Rule at this time.

However you are still required to:

1. Document the name and address of the farm(s) you purchase from.
2. Document type(s) of food you purchased from the farm(s).
3. Maintain the records for 180 calendar days. Time/Date Calculator Online Tool can help.

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<tr>
<td></td>
<td>Columbus, OH 30197</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

• In addition, if your restaurant occasionally makes purchases from another provider outside of your normal purchase process OR if your restaurant provides food to other food providers, you are required to:

1. Maintain a record of the purchase for two years*
2. Record of purchase must include: Product purchased, Date of Purchase, Seller Name/Company and Seller Address

Sample record:

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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*Note: If your restaurant does not have food sales of more than 1 million, you may provide the information in a form other than an electronic sortable spreadsheet. (ex: Sales receipts)
Do you buy direct from the grower?

YOU ANSWERED: NO

Do you occasionally purchase food from another provider outside of your normal purchasing process?

YES ✅ NO ❌
Do you occasionally purchase food from another provider outside of your normal purchasing process?

YOU ANSWERED:

**YES**

Your restaurant is required to:

1. Maintain a record of the purchase for two years*
2. Record of purchase must include:
   - Product purchased, Date of Purchase, Seller Name/Company and Seller Address

Sample record:

<table>
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*Note: If your restaurant does not have food sales of more than 1 million, you may provide the information in a form other than an electronic sortable spreadsheet. (ex: Sales receipts)
Do you occasionally purchase food from another provider outside of your normal purchasing process?

YOU ANSWERED: NO

You may need to follow the FDA’s Traceability Rule. At minimum you will need to have a Traceability Plan and keep records of the FTL foods you receive.

Please visit Restaurant.org/Traceability for the latest information, tools, and guidance about how to comply with the FDA’s Traceability Rule.