



CTF Trace Back Requirements Verified Through Mandatory Government Inspections

Recently there has been much attention on the trace back ability of the tomato industry. As a condition of membership, the California Tomato Farmers cooperative has traceability requirements as part of its overall food safety standards. The ability to conduct product trace back by CTF members is verified through mandatory government inspections as part of its overall food safety standard compliance audits. Trace back requirements are also part of the California Food and Agriculture Code. Below is the section of the CTF food safety standards which outlines California code requirements along with the additional traceability requirements for its members.

*All levels of the tomato supply chain shall maintain adequate traceability to a minimum of one step forward (next recipient) and one step back (immediate previous supplier). **California's Food and Agriculture Code, Article 43 § 1472, provides specific regulations for fresh tomatoes produced in California.** In addition, the CTF provides:*

- 1) *Documentation of packed tomatoes shall include sufficient information about the source (i.e., grower, production location, lot identification, personnel/crew involved in the harvest of the product) as well as the customer receiving the product to allow for the appropriate tracing of product.*
 - i) *The grower shall be able to document the source of agricultural inputs used in each lot of tomatoes handled by the packinghouse.*
- 2) *Corrugated containers for the packing of fresh tomatoes shall be new, and accurately labeled with commodity name, member name, and lot identification sufficient to allow for accurate trace back.*
- 3) *If using reusable containers, (e.g. Reusable Plastic Containers - RPCs), they shall be clean and sanitized before reuse. Ensure that labels are accurate prior to reusing for packing.*
- 4) *A traceability system to track tomatoes back to supply source and forward to customers shall be developed and tested annually. A record of this test shall be kept on file.*
 - i) *Traceability records shall be readily available for USDA auditors.*
- 5) *Tomatoes that are repacked must be done in compliance with California Agriculture Code, Article 43 § 1472.7.1, and shall maintain traceability established by the original shipper and/or grower.*
- 6) *The company shall document the establishment of a recall action team, product complaint log, a flow chart or other means to identify the steps to be taken in the recall process, a plan for product recovery, and annually conducts a successful mock recall.*

7) *The member maintains adequate record of the sale of product, the disposition of unsold product and the source of all products used in the production and marketing of the member's crop.*

Based upon California Agriculture Code 1472.7.1, a repacker or wholesaler doing business in California must maintain lot integrity as established by the grower or shipper.

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