



**Memo**  
Confidential  
12 November, 2008  
Jan Svoboda

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RFID For Track & Trace

## **FDA TRACK & TRACE TECHNOLOGY COMMENTS**

UPM Raflatac thanks the FDA for the opportunity to comment on Track & Trace in the Produce Industry. We acknowledge we have a vested interest in Track & Trace Data Input being automated using Radio Frequency Identification technology (RFID). Based on our thorough understanding of the efficacy and capabilities of RFID technology in Track & Trace together with being foremost loving spouses, caring parents and grandparents, we want RFID Food (and Drug) Track & Trace to protect the health and safety of our families in the immediate future.

Having previewed the Naturipe Farms submission for the November 13, 2008 meeting, we deeply agree that accurate, complete and instantly accessible electronic records with an electronic produce "passport" or "e-pedigree (as it is referred to in the pharma supply chain) are absolutely necessary. In addition we emphasize that only RFID technology is enabling data collection systems and processes to accomplish major steps such as:

- Electronic records and e-pedigree are consistently precise to do microsurgical recalls.
- Epidemiology.
- Good Manufacturing Practices (GMP) and ongoing improvement.
- Ability to reclaim the vast majority of the 20% spoilage occurring today.

Alternate, currently available, data collection technologies will always fall far short of RFID's capabilities and scalability. The California assessment of Earth Bound Farms associated with the 2007 Spinach Recall, and most likely the post mortem analysis of 2008 Tomato/Pepper Recall, demonstrate the current challenges of tracing. Both demonstrate the sheer lack of capability to make fast, accurate and precise decisions once an outbreak is reported, using outdated techniques and too much time to conduct investigations and get to the real cause of an outbreak before more harm to innocent citizens and businesses is done. Relevant, accurate and complete data is always missing because of the ways of the industry: day labour is almost never sufficiently trained and the pressure of productivity coupled with handling perishable items never allow enough time for proper recordkeeping. Substituting barcode data input provides some improvement but is by nature still manual and requires proper training and techniques; precise alignment of the barcode and laser beam and clean visible barcodes as well as the human factor required to scan are not reliable to required levels.



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The unequivocal advantage of RFID technology is in its simplicity of use. Equipment, products, containers, processes, employees and the produce data can all be recorded automatically by just being "near" to each key processing step equipped with an RFID reader. When implemented properly, RFID becomes the true Automatic Identification Technology.

We strongly suggest the FDA reviews the California report on Earth Bound Farms while taking into account the possibilities had RFID technology been in place and more accurate, complete and relevant data was readily available thanks to RFID tagging and systems utilized by the produce supply chain. Consider if every worker wore a RFID badge, like a WHITI ID card, associating the picker with each crate, the handler with every bulk bin, machine operator with each process step, and produce lots with approximate GPS location they were harvested from. Similarly, the same RFID infrastructure would record the appropriate sanitizing steps of crates and bins, the field where the produce is picked, the machinery that handled each crate or bin, or their contents. RFID technology can accomplish this level of data collection with no significant changes or burden to processes, employee training or skill requirements. Similar data collection strategy can be applied to practically every page of the California report where key data was missing. Supporting the Naturipe Farms submission, RFID would have provided all the desired data electronically, available immediately on any day for search and analysis.

We suggest FDA undertakes a number of actions given the energy of the produce industry to reclaim its reputation and ease the concerns of the public relative to the safety in food supply chain. The same steps will also enable the US produce and food industry to start reclaiming its position in the global marketplace as a safer, reputable, more competitive force:

1. Insure the industry makes a full commitment to RFID technology, not a partial step to make the appearance of full implementation, but falling far short of the data availability, relevancy, and accuracy required and easily accomplished by proper implementation of RFID technology. Guide the industry with long term focus to get the most out of the investment they are committed to make, as well as taking advantage of benefits in other areas, which can help justify the investment, for example in the Returnable Packaging Industry's desire to track for better utilization of the assets they rent (retailers would allow their RFID readers to read the GS1 GRAI asset number and report automatically as part of the system).
2. Implement the program the Agency already has in pharmaceutical industry, GMP, so the Produce Industry can self regulate under an equivalent program. GMP in its simplest form is defining a robust process and measures to insure all the proper steps occur, executing the process and recording the measures, and subsequently auditing to insure the process is followed. RFID automates the process data collection and speeds up the audits. We would suggest enlisting the Food Marketing Institute (FMI) to create a next higher level of their SQF (Safe Quality Food) process that assumes RFID execution. Historically, food retailers have used SQF levels as a basis of expectation between themselves, produce growers and distributors.



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3. The Agency needs to define expectations for electronic data exchange and ownership similarly to the system Pharma manufacturers were on track to utilize before California e-pedigree deadlines were extended. Simply stated, growers may consider data about their operations a valuable and competitive advantage, a saleable asset with trading partners, and expecting both the government and data repositories to guard their privacy and confidentiality. Although they may not accept a centralized private or government database, they will likely follow data retention and data exchange guidelines and will make the data available immediately to the FDA when necessary to protect their good name and the health of consumers.
4. Set broad expectations for usage of RFID based data. The FDA's expectations should come from the assumption the collected data will satisfy multitude of expectations and requirements including ePedigree, Track&Trace, process improvement, etc. Create the expectation of data collection to serve multiple public and private functions.

In conclusion, we hope the above points convince the Agency this is a moment of extreme opportunity and leverage for the fresh food industry. Take advantage of the produce industry's concern and willingness to implement systems that will not only aid in securing our food supply but make the industry more efficient and competitive. Use your regulatory authority to vastly improve fresh food supply with 21<sup>st</sup> century technology and guide them to RFID-enabled data collection and management system.

Kind Regards,

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