



August 18, 2025

Dockets Management Staff (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

RE: Docket No. FDA-2014-N-0053 [Requirements for Additional Traceability
Records for Certain Foods: Compliance Date Extension]

Dear Food and Drug Administration Staff:

I write today as the President and CEO of the Convenience Distribution Association. CDA is the national trade organization working on behalf of convenience product distributors in the United States. The convenience distribution sector represents more than \$100 billion in U.S. convenience product sales, serving a wide variety of small retail formats. Convenience distributors directly employ nearly 59,000 people and support over 173,000 jobs annually. The convenience distribution sector contributes billions in economic activity throughout the U.S. economy.

This letter is being submitted in support of the FDA's proposed rule to extend the compliance date of the Food Safety Modernization Act Section 204(d) final rule. The proposed rule as referenced above would extend the compliance date of the final rule from January 20, 2026 to July 20, 2028. The final rule had an effective date of January 20, 2023, and an original compliance date of January 20, 2026.

As summarized by the FDA in the proposed rule to extend the compliance date, the agency has learned that businesses from across the food supply chain, including distributors, need more time to come into compliance because required key data elements are not routinely maintained or shared between businesses, the large volume of data required to be captured and managed would be very challenging, and new technology would need to be acquired.

In March of this year, the CDA surveyed its distributor members about their knowledge of and readiness to comply with the Food Safety Modernization Act Section 204(d) final rule. The responses received from our distributor members echoed what the FDA has learned, namely, that distributors are not ready to comply with the Section 204(d) final rule and need more time to learn about the food traceability requirements, acquire and utilize the necessary scanning

and tracking software to trace food products, and train employees on how to use the new technology to capture and manage food tracing data.

The findings of the CDA survey further demonstrate that many distributors are simply not able to comply with the food traceability rule's original compliance date of January 20, 2026. For this reason, CDA supports the FDA's proposal to extend the compliance date of the final rule titled "Requirements for Additional Traceability Records for Certain Foods" from January 20, 2026 to July 20, 2028. This time extension is necessary to help ensure the successful implementation of the food traceability final rule.

Sincerely,

A handwritten signature in black ink, appearing to read "Kimberly Bolin". The signature is fluid and cursive, with the first name "Kimberly" written in a larger, more prominent script than the last name "Bolin".

Kimberly Bolin
President and CEO
Convenience Distribution Association