

Creation and Transformation



U.S. FOOD & DRUG
ADMINISTRATION

Creation and Transformation



Creating means making or producing a food on the Food Traceability List (e.g., through manufacturing or processing) using only ingredient(s) that are not on the Food Traceability List. Creating does not include originating or transforming a food.



Transformation means an event in a food's supply chain that involves changing a food on the Food Traceability List, its package, and/or its label (regarding the traceability lot code or traceability product identifier), such as by combining ingredients or processing a food (e.g., by cutting, cooking, commingling, repacking, or repackaging). Transformation does not include the initial packing of a single-ingredient food or creating a food.

Creation and Transformation Example



Peanut butter is an example of a food that is created.

- Peanut butter is a food on the Food Traceability List (FTL) that is made from peanuts and additional ingredients that may include salt, sweeteners, and/or emulsifiers.
- Since the individual ingredients of peanut butter do not appear on the FTL, peanut butter is considered a created food for the purposes of traceability.

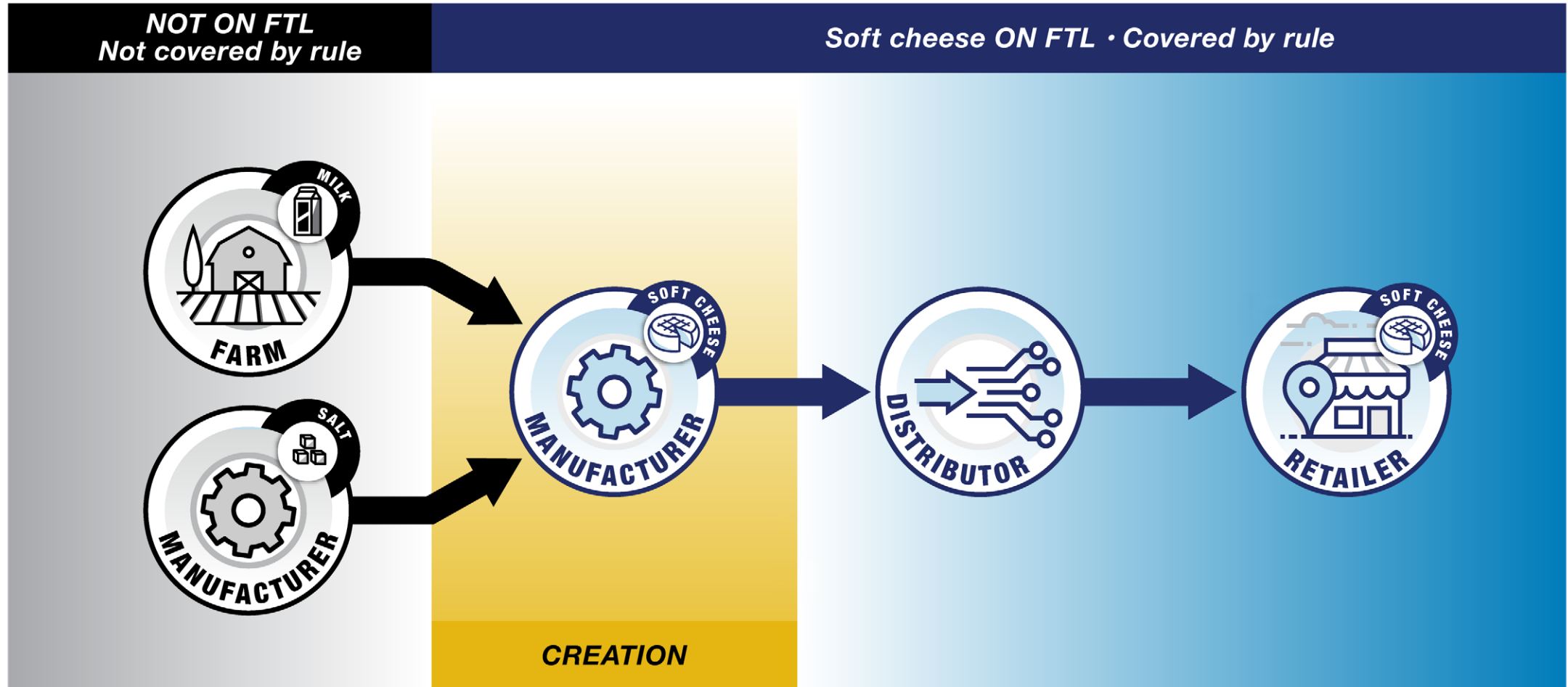
Peanut butter sandwich crackers are an example of a food that is transformed.

- Peanut butter sandwich crackers are a product made from a food on the FTL.
- Peanut butter is added between baked crackers and packaged without further processing and is considered a transformed food for the purposes of traceability.

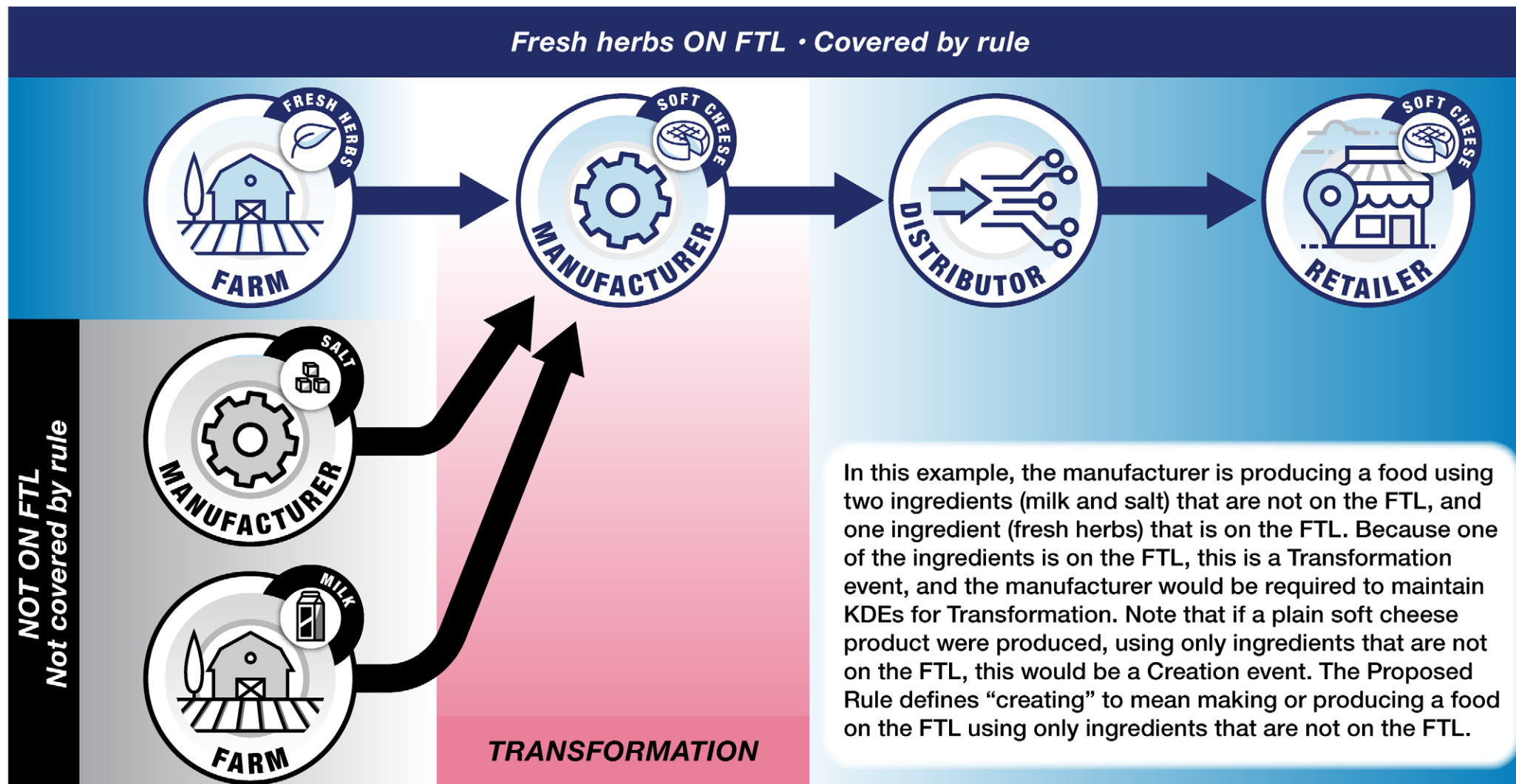
Peanut butter cookies are an example of a food that is transformed, however...

- If the cookies are made with peanut butter and a kill step is applied, recordkeeping requirements would not apply to that person's subsequent shipping of the food, provided that the person maintained a record of application of the kill step.
- And for any persons who receive a food on the Food Traceability List that has been subjected to a kill step, recordkeeping requirements would not apply to that person's receipt or subsequent transformation and/or shipping of the food.

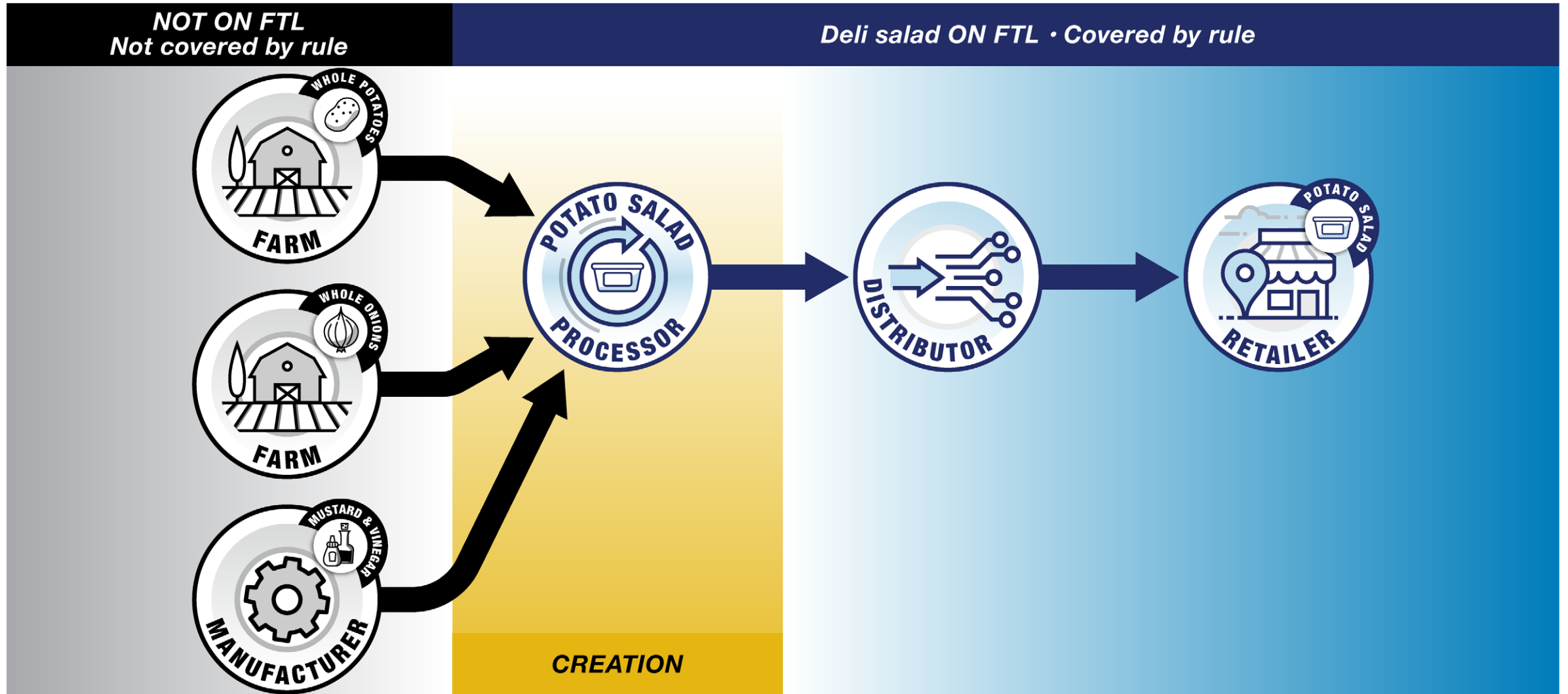
Soft Cheese

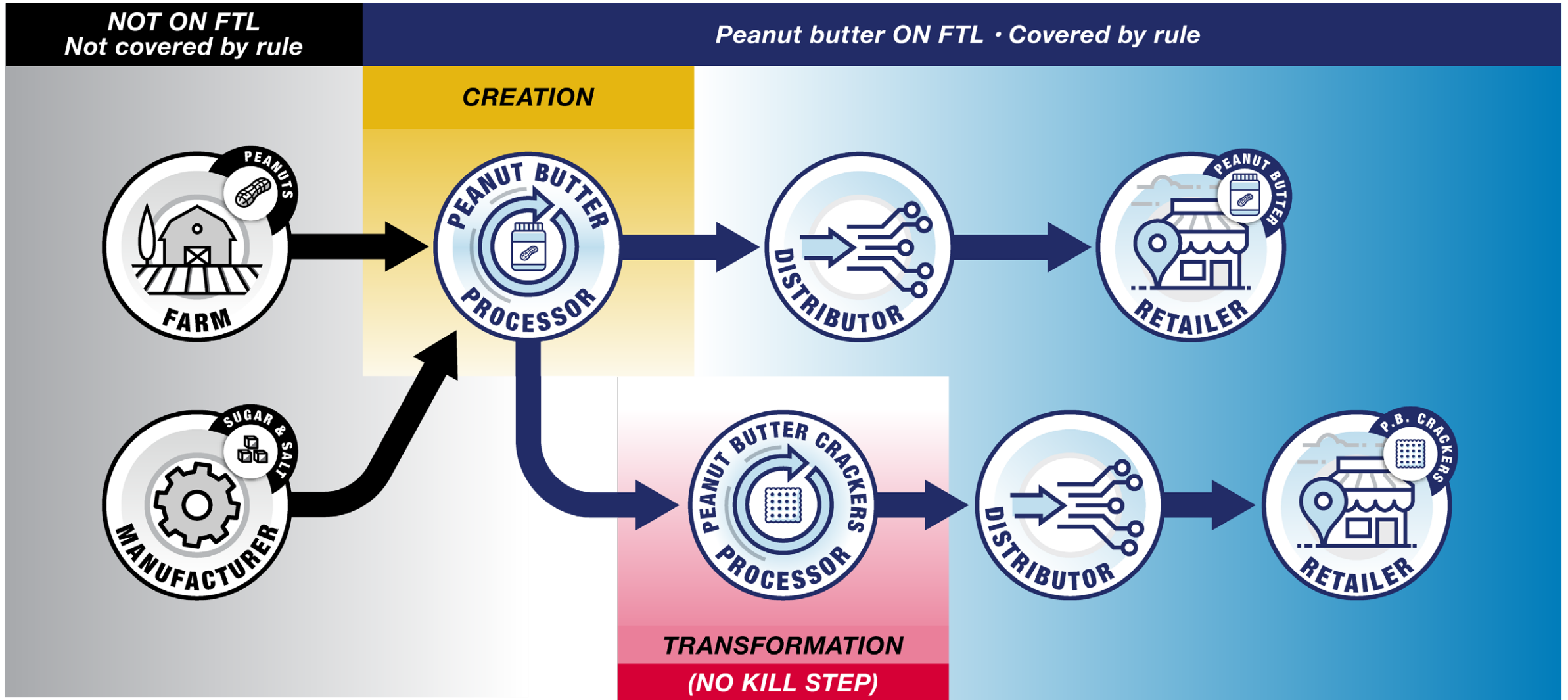


Soft Cheese with Fresh Herbs

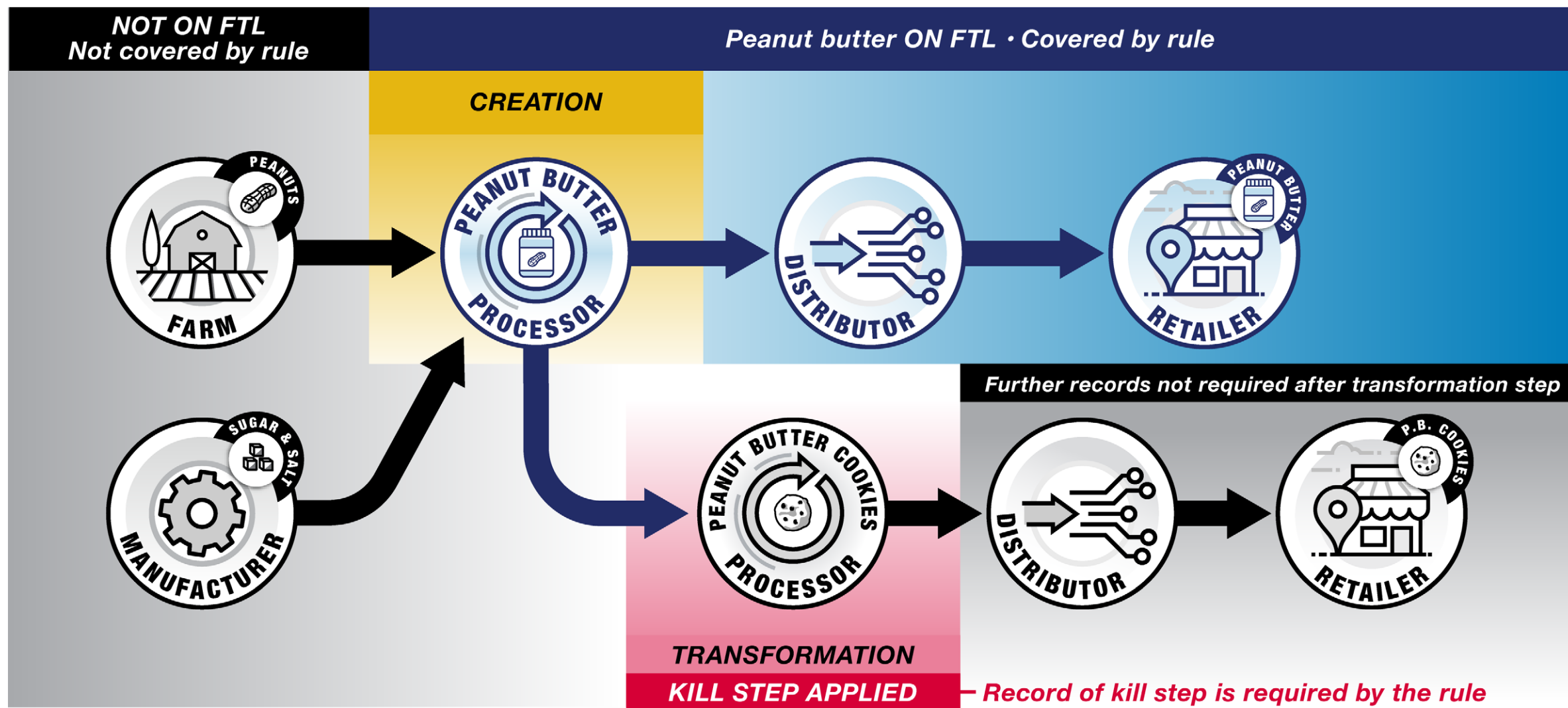


Potato Deli Salad





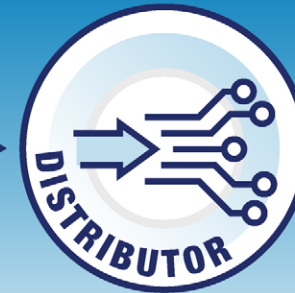
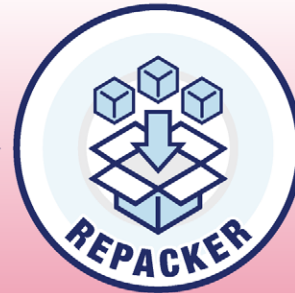
Peanut Butter and Peanut Butter Cookies (Kill step)



Cucumbers

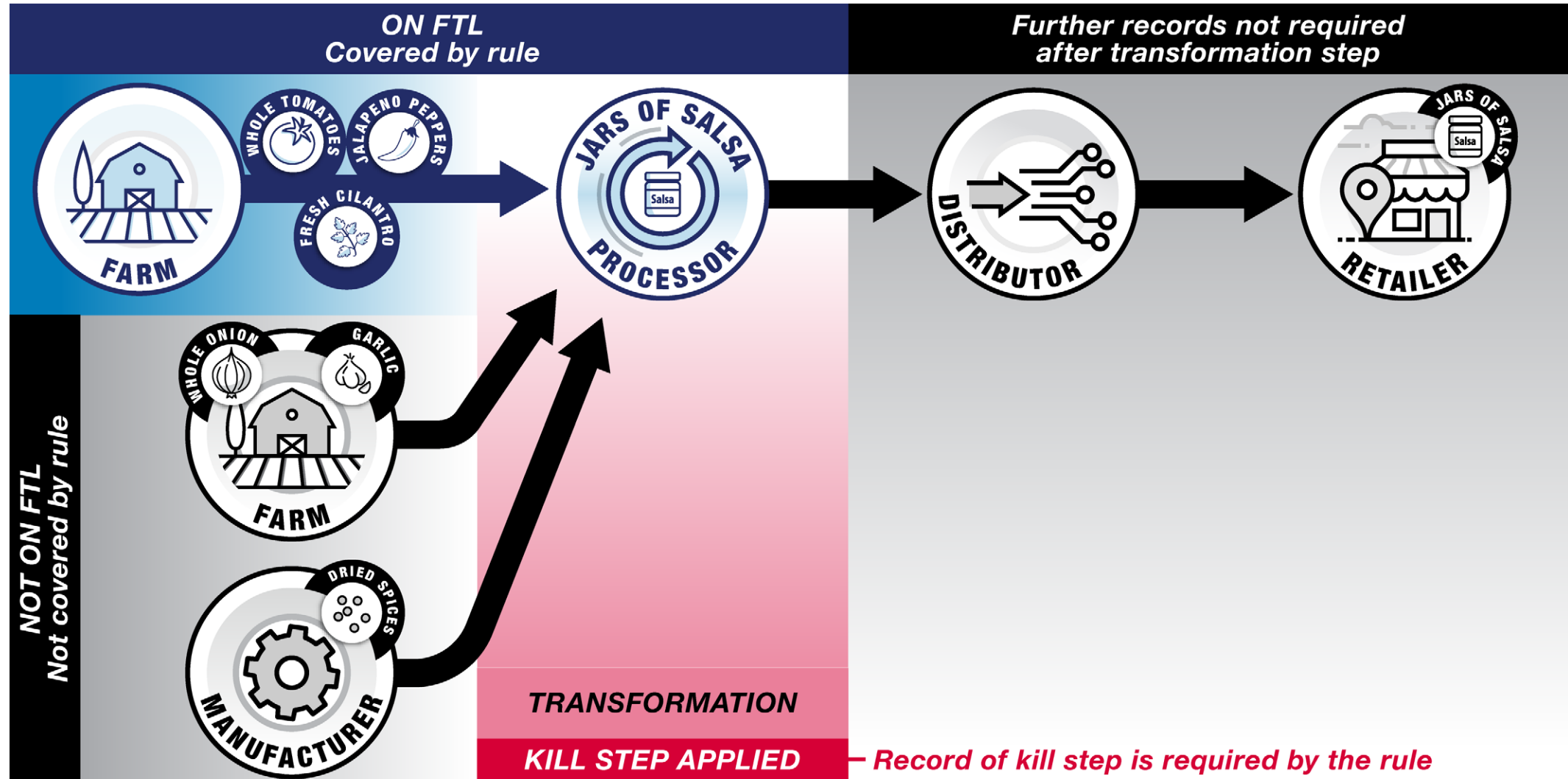


Cucumbers ON FTL • Covered by rule



TRANSFORMATION

Jars of Salsa (kill step applied)



Record of kill step is required by the rule

Fresh-Cut Romaine



Leafy greens ON FTL • Covered by rule

