

What all restaurant operators need to know about FDA's new Food Traceability Rule [Food list below]

New rules go into effect in 2026 and will require extensive changes.



In November of 2022, the Food & Drug Administration (FDA) released the Food Traceability Final Rule, "[Requirements for Additional Traceability Records for Certain Foods](#)," which is designed to facilitate quicker identification of potentially contaminated foods. Food safety is a primary focus for all operators, so it's important to understand what this new rule requires.

What data do restaurant operators have to track?

Beginning January 20, 2026, restaurants will be required to follow a new set of food traceability rules to track food items on the [Food Traceability List](#), which includes fresh fruits and vegetables, shell eggs, nut butters, cheeses, and seafood products. These food products will need to have a record of where each originated.

The new rule calls for Key Data Elements (KDEs) that restaurants must maintain to show record of Critical Tracking Events (CTEs). For MOST restaurants, this will mean having to track the KDEs of received goods and food products. Most suppliers are aware of the new rule and will work with operators to identify ways to help manage the necessary KDEs throughout the supply chain. It is expected that the increased record-keeping requirements will result in higher costs to restaurants.

What will restaurant have to be able to show in their tracking?

Suppliers will work with restaurant operators to establish information exchanges that include required data for items on the traceability list. This could include where the product came from, the date and location where the restaurant accepted the product, the traceability lot-code source information, as well as reference document information.

Restaurants will also be required to develop an electronic traceability plan that clearly describes their procedure for maintaining records for foods they handle. In the case of a foodborne illness outbreak at the restaurant: If requested, a restaurant must be able to present requested traceability records to the FDA within 24 hours (or other reasonable time frame agreeable to FDA) from when the FDA makes the request.

Which restaurants must comply with the new rule?

All restaurants selling food and beverage totaling more than \$250,000 annually will be required to provide traceability records, so most small restaurants will be impacted by the rule.

Restaurants selling between \$250K and \$1M have a different reporting requirement and may not have to produce electronic records, but can submit receipts, invoices, etc. All restaurants selling over \$1M will be required to have electronic records.

The Food Traceability List

Food Traceability List	Description
Cheeses, other than hard cheeses, specifically:	
<ul style="list-style-type: none"> <li data-bbox="118 310 427 405">• Cheese (made from pasteurized milk), fresh soft or soft unripened 	Includes soft unripened/fresh soft cheeses. Examples include, but are not limited to, cottage, chevre, cream cheese, mascarpone, ricotta, queso blanco, queso fresco, queso de crema, and queso de puna. Does not include cheeses that are frozen or previously frozen, shelf stable at ambient temperature, or aseptically processed and packaged.
<ul style="list-style-type: none"> <li data-bbox="118 510 427 604">• Cheese (made from pasteurized milk), soft ripened or semi-soft 	Includes soft ripened/semi-soft cheeses. Examples include, but are not limited to, brie, camembert, feta, mozzarella, taleggio, blue, brick, fontina, monterey jack, and muenster. Does not include cheeses that are frozen or previously frozen, shelf stable at ambient temperature, or aseptically processed and packaged.
<ul style="list-style-type: none"> <li data-bbox="118 678 427 793">• Cheese (made from unpasteurized milk), other than hard cheese[1] 	Includes all cheeses made with unpasteurized milk, other than hard cheeses. Does not include cheeses that are frozen or previously frozen, shelf stable at ambient temperature, or aseptically processed and packaged.
Shell eggs	Shell egg means the egg of the domesticated chicken.
Nut butters	Includes all types of tree nut and peanut butters. Includes all forms of nut butters, including shelf stable, refrigerated, frozen, and previously frozen products. Examples include, but are not limited to, almond, cashew, chestnut, coconut, hazelnut, peanut, pistachio, and walnut butters. Does not include soy or seed butters.
Cucumbers (fresh)[2]	Includes all varieties of fresh cucumbers.
Herbs (fresh)	Includes all types of fresh herbs. Examples include, but are not limited to, parsley, cilantro, and basil. Herbs listed in 21 CFR 112.2(a)(1), such as dill, are exempt from the requirements of the rule under 21 CFR 1.1305(e).
Leafy greens (fresh)	Includes all types of fresh leafy greens. Examples include, but are not limited to, arugula, baby leaf, butter lettuce, chard, chicory, endive, escarole, green leaf, iceberg lettuce, kale, red leaf, pak choi/bok choi, Romaine, sorrel, spinach, and watercress. Does not include whole head cabbages such as green cabbage, red cabbage, or savoy cabbage. Does not include banana leaf, grape leaf, and leaves that are grown on trees. Leafy greens listed in § 112.2(a)(1), such as collards, are exempt from the requirements of the rule under § 1.1305(e).
Leafy greens (fresh-cut)[3]	Includes all types of fresh-cut leafy greens, including single and mixed greens.
Melons (fresh)	Includes all types of fresh melons. Examples include, but are not limited to, cantaloupe, honeydew, muskmelon, and watermelon.
Peppers (fresh)	Includes all varieties of fresh peppers.
Sprouts (fresh)	Includes all varieties of fresh sprouts (irrespective of seed source), including single and mixed sprouts. Examples include, but are not limited to, alfalfa sprouts, allium sprouts, bean sprouts, broccoli sprouts, clover sprouts, radish sprouts, alfalfa & radish sprouts, and other fresh sprouted grains, nuts, and seeds.
Tomatoes (fresh)	Includes all varieties of fresh tomatoes.

Tropical tree fruits (fresh)	Includes all types of fresh tropical tree fruit. Examples include, but are not limited to, mango, papaya, mamey, guava, lychee, jackfruit, and starfruit. Does not include non-tree fruits such as bananas, pineapple, dates, soursop, jujube, passionfruit, Loquat, pomegranate, and sapodilla. Does not include tree nuts such as coconut. Does not include pit fruits such as avocado. Does not include citrus, such as orange, clementine, tangerine, mandarins, lemon, lime, citron, grapefruit, kumquat, and pomelo. Tropical tree fruits listed in § 112.2(a)(1), such as figs, are exempt from the requirements of the rule under § 1.1305(e).
Fruits (fresh-cut)	Includes all types of fresh-cut fruits. Fruits listed in § 112.2(a)(1) are exempt from the requirements of the rule under § 1.1305(e).
Vegetables other than leafy greens (fresh-cut)	Includes all types of fresh-cut vegetables other than leafy greens. Vegetables listed in § 112.2(a)(1) are exempt from the requirements of the rule under § 1.1305(e).
Finfish (fresh, frozen, and previously frozen), specifically:	
<ul style="list-style-type: none"> • Finfish, histamine-producing species 	Includes all histamine-producing species of finfish. Examples include, but are not limited to, tuna, mahi mahi, mackerel, amberjack, jack, swordfish, and yellowtail.
<ul style="list-style-type: none"> • Finfish, species potentially contaminated with ciguatoxin 	Includes all finfish species potentially contaminated with ciguatoxin. Examples include, but are not limited to, grouper, barracuda, and snapper.
<ul style="list-style-type: none"> • Finfish, species not associated with histamine or ciguatoxin 	Includes all species of finfish not associated with histamine or ciguatoxin. Examples include, but are not limited to, cod, haddock, Alaska pollock, salmon, tilapia, and trout.[4] Siluriformes fish, such as catfish, are not included.[5]
Smoked finfish (refrigerated, frozen, and previously frozen)	Includes all types of smoked finfish, including cold smoked finfish and hot smoked finfish.[6]
Crustaceans (fresh, frozen, and previously frozen)	Includes all crustacean species. Examples include but are not limited to shrimp, crab, lobster, and crayfish.
Molluscan shellfish, bivalves (fresh, frozen, and previously frozen)[7]	Includes all species of bivalve mollusks. Examples include, but are not limited to, oysters, clams, and mussels. Does not include scallop adductor muscle. Raw bivalve molluscan shellfish that are (1) covered by the requirements of the National Shellfish Sanitation Program; (2) subject to the requirements of 21 CFR part 123, subpart C, and 21 CFR 1240.60; or (3) covered by a final equivalence determination by FDA for raw bivalve molluscan shellfish are exempt from the requirements of the rule under § 1.1305(f).
Ready-to-eat deli salads (refrigerated)	Includes all types of refrigerated ready-to-eat deli salads, including ready-to-eat deli salads that are frozen at some point in the supply chain prior to retail. Examples include, but are not limited to, egg salad, potato salad, pasta salad, and seafood salad. Does not include meat salads.

[1] "Hard cheese" includes hard cheeses as defined in 21 CFR 133.150, colby cheese as defined in 21 CFR 133.118 and caciocavallo siciliano as defined in 21 CFR 133.111. Examples of hard cheese include, but are not limited to, cheddar, romano, and parmesan.

[2] The designation "fresh" does not include previously frozen forms of the food.

[3] The designation "fresh-cut" does not include previously frozen forms of the food.

[4] For a more comprehensive list, see [Chapter 3 of the Fish and Fishery Products Hazards and Controls Guidance](#).

[5] Data for catfish were excluded from the Risk-Ranking Model because Siluriformes fish (such as catfish) are primarily regulated by the U.S. Department of Agriculture.

[6] "Smoked finfish" refers to a finfish product that meets the definition of a smoked or smoke-flavored fishery product in 21 CFR 123.3(s).

[7] Under 21 CFR 123.3(h), *molluscan shellfish* means any edible species of fresh or frozen oysters, clams, mussels, or scallops, or edible portions of such species, except when the product consists entirely of the shucked adductor muscle.