



Bulletin 21-09 February 23, 2021

CIAA Bulletin

**An Exclusive CIAA Member
Update**

CIAA Submits Comments to FDA Requesting Changes to Food Traceability Rule

On February 22, 2021, the [CIAA submitted comments](#) to FDA on the Proposed Rule issued by the U.S. Food and Drug Administration (FDA), titled “Requirements for Additional Traceability Records for Certain Foods”. In its comments, the CIAA provided recommendations for streamlining requirements, removing duplicative or unnecessary records and information, and reducing the regulatory burden on small businesses to ensure overall compliance.

In the comments, CIAA expressed that it is generally supportive of FDA’s efforts to establish traceability recordkeeping requirements, and writes these comments to refine the FDA’s goals of “improving the ability to quickly and efficiently trace the movement through the supply chain of foods identified as causing illness, identify and remove contaminated food from the marketplace, and develop mitigation strategies to prevent future contamination.” However, CIAA requested FDA take the following actions prior to finalizing the rule:

- Refine the Scope of Cheeses Included in the Food Traceability List.
- Clarify the term “Shipping” as it Applies to § 1.1350.
- Eliminate Requirement to Maintain Entry Numbers for Records in §§ 1.1335 and 1.350.
- Remove the Requirement in §§ 1.1335 and 1.1350 that Receivers and Shippers Maintain Records of Location Identifier, Location Description, and a Point of Contact for the Lot Code Generator or Clarify the Requirement as It Applies to Imported Foods.
- Change the Requirement to Provide an Electronic Sortable Spreadsheet in § 1.1455(b)(3).
- Extend the Proposed Compliance Time Period.

We will continue to monitor FDA's development of the Food Traceability Rule. If you have questions, please contact the Husch Blackwell team at CIAAGeneralCounsel@huschblackwell.com.

Cheese Importers Association of America

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INDUSTRY DATES TO REMEMBER

MARCH 1, 2021 (approximately)

FAS issues final notice of calendar year 2021 licenses to licensees.

March 15, 2021

The license fee for each license issued is due and payable in full no later than March 15 of the year for which the license is issued. Licenses issued after March 15 of any quota year are payable in full no later than 10 days from the date of issuance. Fee payments are payable to the Treasurer of the United States and shall be made solely utilizing the electronic software designated for the purpose by the Licensing Authority.

JULY 1, 2021

Last day for an exporting country that is not designating importers for calendar year 2021 to notify FAS.

AUGUST 31, 2021

Last day to enter dairy products into U.S. Customs territory that may be used to qualify and establish eligibility for a calendar year 2021 license.

SEPTEMBER 1, 2021

First day of license eligibility period for next quota year-plus one. Example: entries made on or after September 1, 2021 can be used to establish eligibility for a license for calendar year 2022.

SEPTEMBER 1, 2021

Last date to request globalization of a calendar year 2020 license. First transmission date for applications for reallocated license amounts for calendar year 2020. First transmission date for all applications for calendar year 2021 licenses.

SEPTEMBER 15, 2021

(no exceptions!) Last transmission date for licensees applying for reallocated license amounts for calendar year 2021.

OCTOBER 1, 2021

(no exceptions!) Last transmission date for licensees to surrender all or the unused portion of their calendar year 2021 licenses.

OCTOBER 15, 2021

(no exceptions!) Last transmission date for all applications for calendar year 2022 licenses.

OCTOBER 31, 2021

Exporting countries that are designating U.S. importers for calendar year 2022 must submit their designations to FAS by this date.

DECEMBER 20, 2021

(approximately) FAS issues first notice of calendar year 2022 licenses to licensees.

DECEMBER 31, 2021

Last day for licensees to make entries to fulfill the requirement to use 85% of their calendar year 2021 license amount. Last day for which calendar year 2021 licenses are valid

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