

**Speaking notes**

**FDA Docket # FDA-2009-N-0523**

**Washington, D.C, dated: December 09, 2009**

**Improving Product Tracing of Foods: More Rapid Outbreak Response**

**Public Comment – FDA/FSIS organizers**

Good Afternoon. I am Dr. Sudhakar Gopalakrishnan the global product manager at Sensitel, Inc located in Fremont, California. Sensitel provides solutions to secure products and supply chains.

I thank the FDA and FSIS committee for giving us the opportunity to share our perspective on food traceability issues.

I have three insights that I want to share today.

I want to start by discussing the recall itself. At the time of crisis, people don't talk to each other, companies don't share documents amongst themselves and traceability systems don't work together. So it is a "COMMUNICATION PROBLEM" and not a "SYSTEMS PROBLEM". Precious time is spent creating the links in the system. The time of crisis is the last place to begin creating the links between orders, shipments, lots, item and locations on one hand, audit reports, and documentation on the other hand and the social network of people involved. The crisis response system that we are discussing must be able to bring key decision makers, key information and a risk management approach in a single dashboard.

The second point is regarding the identification code which is the most significant link. Today many companies are implementing proprietary identification codes. If we all agree, and I hope we do that response time is of essence then it is imperative that the identification codes be based on a open standard, readable and understandable not only by the trading partners but also one that is open to the general consumer.

Lastly I want to talk about the one person in this chain least communicated to and one who stands to suffer the most. It's the consumer. The traceability system should be such that the trace info is extensible all the way to the general consumer. We should ask and be able to answer the question as to how would a consumer respond to the recall event, and how information will be shared with the consumer on recalled products and how the consumer will identify and dispose the product that may still be there at their homes, schools or offices.

At Sensitel, we have a holistic approach about solving these problems and have developed three products that addresses these issues. The first product, TrackAware.com brings together people, documents and traceability information at one location. The second product, VeriSupply.com enables

easy sharing of food safety documents among retailers, suppliers, shippers and growers. Lastly Verisense.com enables real time monitoring of environmental conditions. All the three products work together seamlessly to meet the goals of food safety and whole chain traceability.

Thank you for giving us the time.