



AIM North America Public Comments
FDA Public Meeting on a New Era of Smarter Food Safety
Monday, October 21, 2019, Rockville, MD

Good afternoon my name is Jeanne Duckett and I sit on the Board of Directors of the standards group known as AIM North America, in addition to being on the Board of Directors I'm also the North American food policy chair; I am on the ISO technical experts group and the previous chair of the Internet of Things, RFID experts group and the Traceability committees. For my day job I work for Avery Dennison corporation.

We were founded in the early 1970s and with nearly 50 years of experience. AIM North America has a history of promoting standards development in barcodes, RFID and Automatic Identification and Tracking technologies. The reason AIM North America is here today is to be the voice of the solution providers.

AIM North America is an unbiased and technology agnostic open resource for the FDA as they are making their guidelines as our membership has the technical experience and expertise in supply chain transparency. In addition, AIM North America is currently outlining a series of webinars that are publicly available providing information on the different touch points of the interoperable supply chain.

AIM North America has spoken on Capitol Hill on several initiatives including the UDI initiative, the IUID regulation, and the DSCSA bill. In some ways, FSMA can be compared to the Unique Device Identification bill in that things need a data carrier containing a Globally Unique digital identity creating a digital identity to show provenance. Our goal is standards-based interoperability with the believe that it benefits all supply chain participants by lowering the technological and financial barriers to adoption.

Interoperability is one of those things that can be hard to define but you know it when you see it because the users enjoy a seamless experience. It is enabled by standards including those for the physical to digital identity and harmonization of data capture points.

However, don't underestimate the difficulty of the physical/digital data capture in very diverse locations capturing multiple types of data from sensor (temp, CO2, humidity) along with unique product identification. Next, we need to determine what supply chain steps are needed to be captured to ensure interoperability.

Another aspect of the AIM North America's mission is education. Recently, we've been working on the outline of Transparency for Dummies - a publication that will assist the users determine implementation steps, business benefits and relates success stories from adopters.

To summarize AIM North America will support the Smarter Food Supply chain through standards development, advocacy and education.

One Landmark North
20399 Route 19 North, Suite 203
Cranberry Twp., PA 16066 USA

Phone: +1 724 742 4473
Fax: +1 724 742 4476
email: info@aim-na.org