

# FSMA 204(d) Traceability Rule

2025 Update

Central Market

FAVOR

H-E-B

Joe V's  
SMART SHOP  
Meat • Produce • Groceries

MI TIENDA  
by H-E-B

# FDA Traceability Rule

## 2025 Update

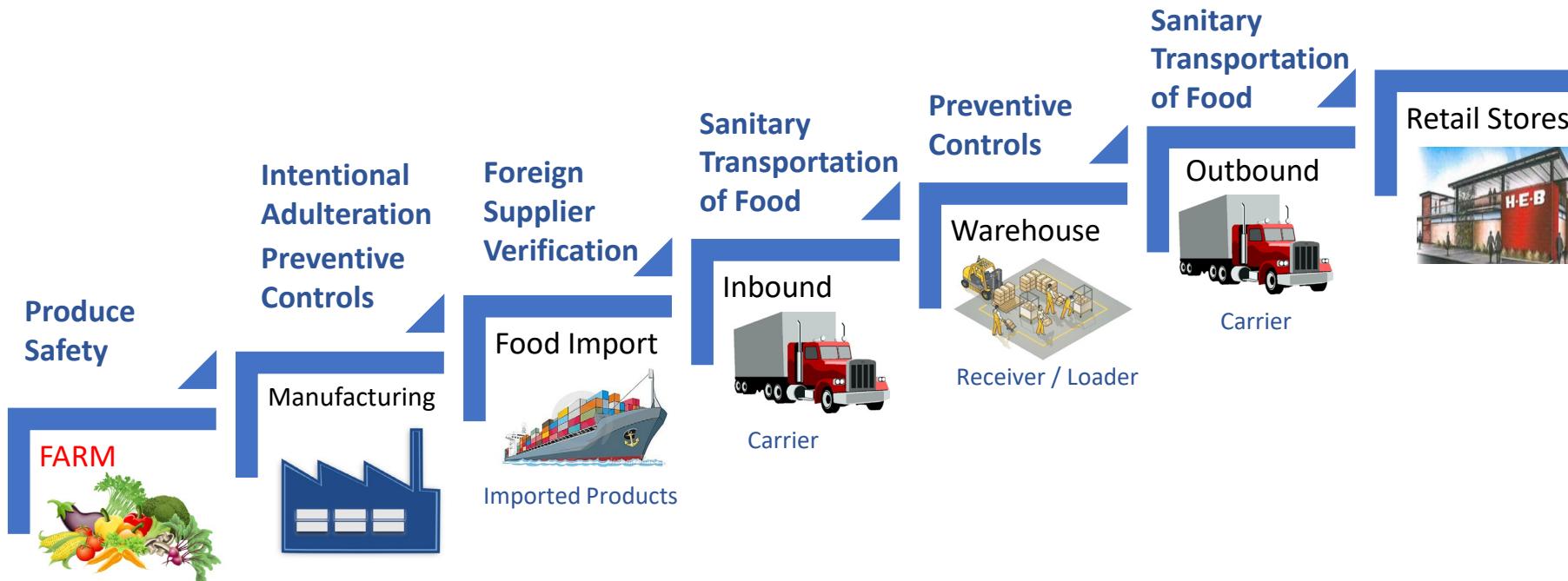


# Agenda

- FSMA Review
- FSMA 204(d) “Traceability Rule?”
- Visual of Industry Impact
  - By Product Category – Food Traceability List (FTL)
  - By Areas of Operations - Critical Tracking Events (CTEs)
- Examples of Potential Industry Approach
- Project Team Collaboration
- Planned Timeline
- Q&A Session

# FSMA and Traceability

# Food Safety Modernization Act (FSMA) Overview



# FSMA 204(d):

## Additional Recordkeeping Requirements for High-Risk Foods

Requirements shall:

- Not require a full pedigree
- Not require records of recipients of a food beyond the immediate subsequent recipient of a food (can only go one up)
- Not prescribe specific technologies for maintaining records
- Allow maintenance of records at an accessible location
- Include a process by which a food may be removed from the designated list
- Be science-based
- Apply only to designated foods – Food Traceability List (FTL)



# What is the FTL List?

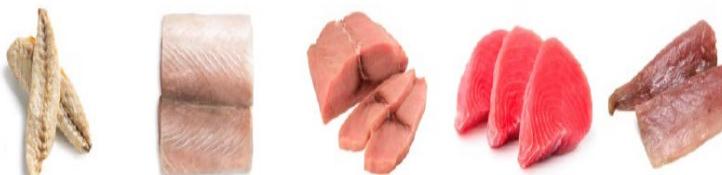
FDA's [Food Traceability Final Rule](#) (FSMA 204) requires organizations who manufacture, process, pack, or hold foods on the [Food Traceability List](#) to keep additional traceability records (Key Data Elements).

Below is a pictorial representation of products in the Food Traceability List

**Vegetables other than leafy greens (fresh-cut)**



**Finfish, (fresh and frozen)**



**Smoked finfish (refrigerated and frozen)**



**Crustaceans (fresh and frozen)**



**Ready-to-eat deli salads (refrigerated)**



**Molluscan shellfish, bivalves (fresh and frozen)**



# Requirements

# What is the FDA rule? FSMA 204 (d)

- To comply with FSMA section 204(d), certain product attributes must be captured for items that enter our system (for specific foods – FTL)
- Ability to provide source to store reporting that includes the attributes authorities need within 24 hrs. upon request



## § 1.1340 What records must I keep when I SHIP a food on the Food Traceability List?

#	Attribute	Details
1	Traceability lot code	Industry has agreed on GTIN + Lot Code
2	Quantity and unit of measure	e.g., 6 cases, 25 reusable plastic containers, 100 tanks, 200 pounds
3	Product description	Product name, brand name, commodity, variety, packaging size/style, seafood species
4	Location description for receiver	Business name, phone, address, city, state, zip code, country
5	Location description for source	Business name, phone, address, city, state, zip code, country
6	Date	Date when food was shipped
7	Traceability Lot Code Source (TLC Source) or Traceability Lot Code Source Reference (TLC Source Reference)	TLC Source: The place where a food was assigned a traceability lot code. Includes company address, city, state, zip code, contact. TLC Source Reference: alternative method for providing the location description for the TLC Source. Could include web address, FFRN, DUNS, or GLN. Note: Websites/registries need to be accessible by the FDA.
8	Reference documents	Business transaction document or record that may contain some or all of the key data elements for an event. Can include: BOL, PO, ASN, work orders, invoices, receipts, etc.

**§ 1.1340:** Shippers must provide (in electronic, paper, or other written form) the information in this section to the immediate subsequent recipient (other than a transporter) of each traceability lot that is shipped.

Source: [eCFR Subpart S - Additional Traceability Records for Certain Foods](#)



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## Compliance Date

The compliance date for all persons subject to the recordkeeping requirements was Tuesday, January 20, 2026 / **Now – July 2028**

# Critical Tracking Events (CTE) & Key Data Elements (KTE)

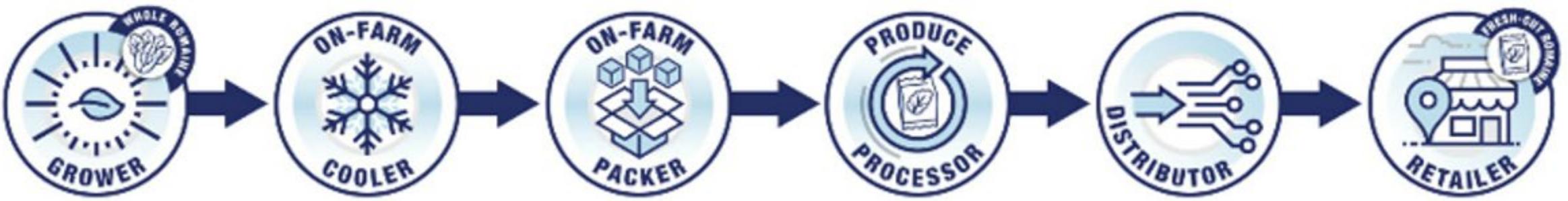


# KDE Spreadsheet Example - FDA

A	B	C	D	E	F
<b>Traceability Lot Code (you assigned)</b>  [The Traceability Lot Code you assigned to the food obtained from a fishing vessel]	<b>Species and/or Acceptable Market Name, If the Food is Unpackaged</b>  (e.g., <i>Gadus morhua</i> - Tuna, <i>Hamatus americanus</i> - Snapper)	<b>Product Description, If the Food is Packaged - Product Name</b>  n/a (Unpackaged)	<b>Product Description, If the Food is Packaged - Brand Name (if applicable)</b>  (Marketed Brand of this food product)	<b>Product Description, If the Food is Packaged - Commodity (if applicable)</b>  (e.g., Cod, Tuna, Lobster, Snapper)	<b>Product Description, Packaged Variety (if applicable)</b>  (e.g., Atlantic Cod, Alaskan Lobster, Red Snapper)
BF0901-D	Butterfish ( <i>Pagrus macanthus</i> )	n/a (Unpackaged)	n/a (Unpackaged)	n/a (Unpackaged)	n/a (Unpackaged)
SNR8UPOCT2026	Red Snapper ( <i>Lutjanus campechanus</i> )	n/a (Unpackaged)	n/a (Unpackaged)	n/a (Unpackaged)	n/a (Unpackaged)
GTIN:03412345678900 LOT:PFBA324	n/a (Packaged)	Last Frontier Pollock 44# Filet Block	Last Frontier	Pollock	Walleye Pollock ( <i>Gadus</i> sp.)
1					
2					
3					
4					
5					
6					
7					
8					
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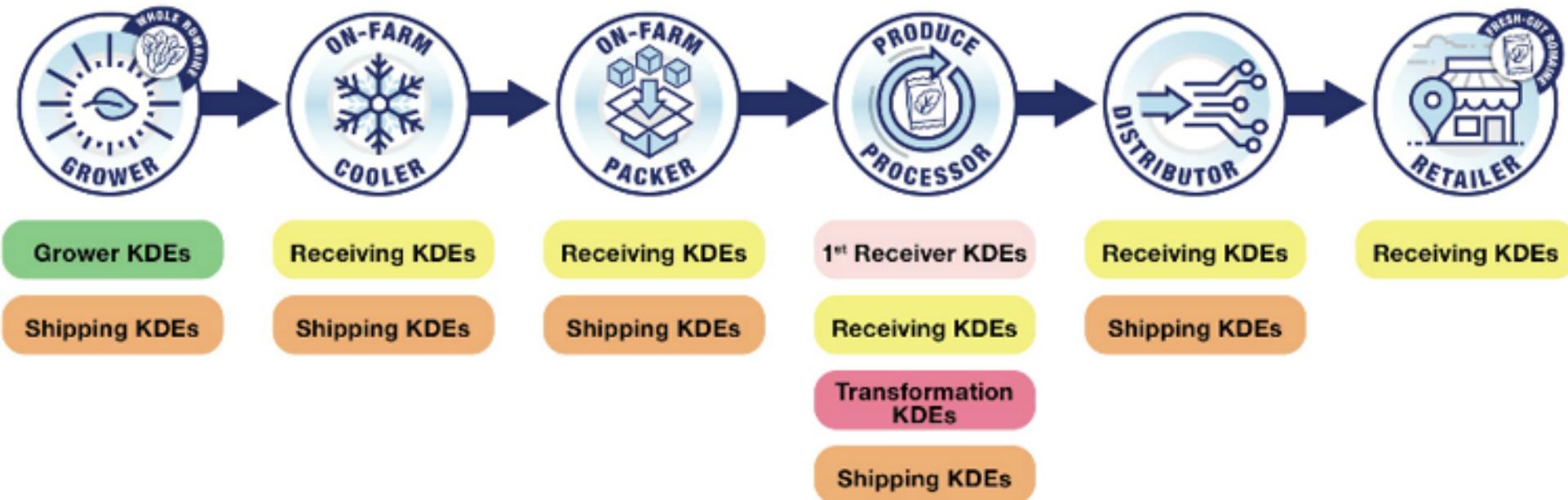
15 Tabs Columns A - Z

# Critical Tracking Events (CTE) & Key Data Elements (KTE)



Information About the Individual		Information About the Individual's Family		Individual's Education & Employment		Individual's Health & Activity Level		Individual's Personal Information		Individual's Family Information		Individual's Health Information	
Name, Address, and Social Security Number		Relationship to the Individual, Name, and Social Security Number		Education Level, Last School Attended, Last Grade Completed, Last Month Attended, Last Month Discontinued		Health Status, Last Doctor Visited, Last Doctor's Name, Last Doctor's Address, Last Doctor's Phone Number		Gender, Date of Birth, Marital Status, Sex, Height, Weight, Blood Type, Eye Color, Hair Color, Ethnicity, Religious Preference, Religious Organization, Religious Leader, Religious Leader's Name, Religious Leader's Address, Religious Leader's Phone Number		Name, Address, and Social Security Number		Relationship to the Individual, Name, and Social Security Number	
First Name, Middle Name, Last Name, Social Security Number		Relationship to the Individual, Name, Social Security Number		Education Level, Last School Attended, Last Grade Completed, Last Month Attended, Last Month Discontinued		Health Status, Last Doctor Visited, Last Doctor's Name, Last Doctor's Address, Last Doctor's Phone Number		Gender, Date of Birth, Marital Status, Sex, Height, Weight, Blood Type, Eye Color, Hair Color, Ethnicity, Religious Preference, Religious Organization, Religious Leader, Religious Leader's Name, Religious Leader's Address, Religious Leader's Phone Number		Name, Address, and Social Security Number		Relationship to the Individual, Name, Social Security Number	
BRIDGE		Sister (Stepbrother)		Unemployed		Unemployed		Female, 30, Divorced, Female, 5'4", 120 lbs, B+, Brown, Brown, Hispanic, Protestant, First United Methodist Church, Rev. John Doe, 123 Main Street, 555-1234		BRIDGE		Sister (Stepbrother)	
BRIDGE/DOES		Mother (Stepbrother)		Unemployed		Unemployed		Female, 30, Divorced, Female, 5'4", 120 lbs, B+, Brown, Brown, Hispanic, Protestant, First United Methodist Church, Rev. John Doe, 123 Main Street, 555-1234		BRIDGE/DOES		Mother (Stepbrother)	
BRIDGE/DOES/FOODS		Unemployed		Last Name, First Name, Middle Initial		Last Name		Female		BRIDGE/DOES/FOODS		Unemployed	

# High-level Example



# Technology Options for 204(d) Compliance

GS1 -128 + modified ASN (EDI)
<input type="checkbox"/> Leverage existing data carriers.
<input type="checkbox"/> Will need to adopt GLN for locations.
<input type="checkbox"/> Will need to augment ASN to include UCC-128 + traceability data

**Risks**

- Supplier adoption of EDI and ability to modify ASN to support
- 48-character limit



2D Barcode
<input type="checkbox"/> Holds up to 2,300 characters worth of data.
<input type="checkbox"/> Two options: dot matrix or QR code.

**Risks**

- Not reliable on brown corrugate (*need to test this*)
- old printers may not support
- printing needs to be in-line with embed traceability data (*smaller suppliers may not be able to support*)



RFID (Radio Frequency Identification)
<input type="checkbox"/> Holds over 3k characters worth of data.
<input type="checkbox"/> Costs ~15 cents per tag (passive RFID embedded in printable thermal transfer label).
<input type="checkbox"/> Can last 20 years and have a range of ~10m.

**Risks**

- requires capital investment for scanning technology
- printing needs to be in-line in order to embed traceability data (*smaller suppliers may not be able to support*)
- difficulty reading the middle of pallets if product contains metal or liquid. (i.e. – *pallet of canned vegetables*)



# UPC and 128 Barcodes

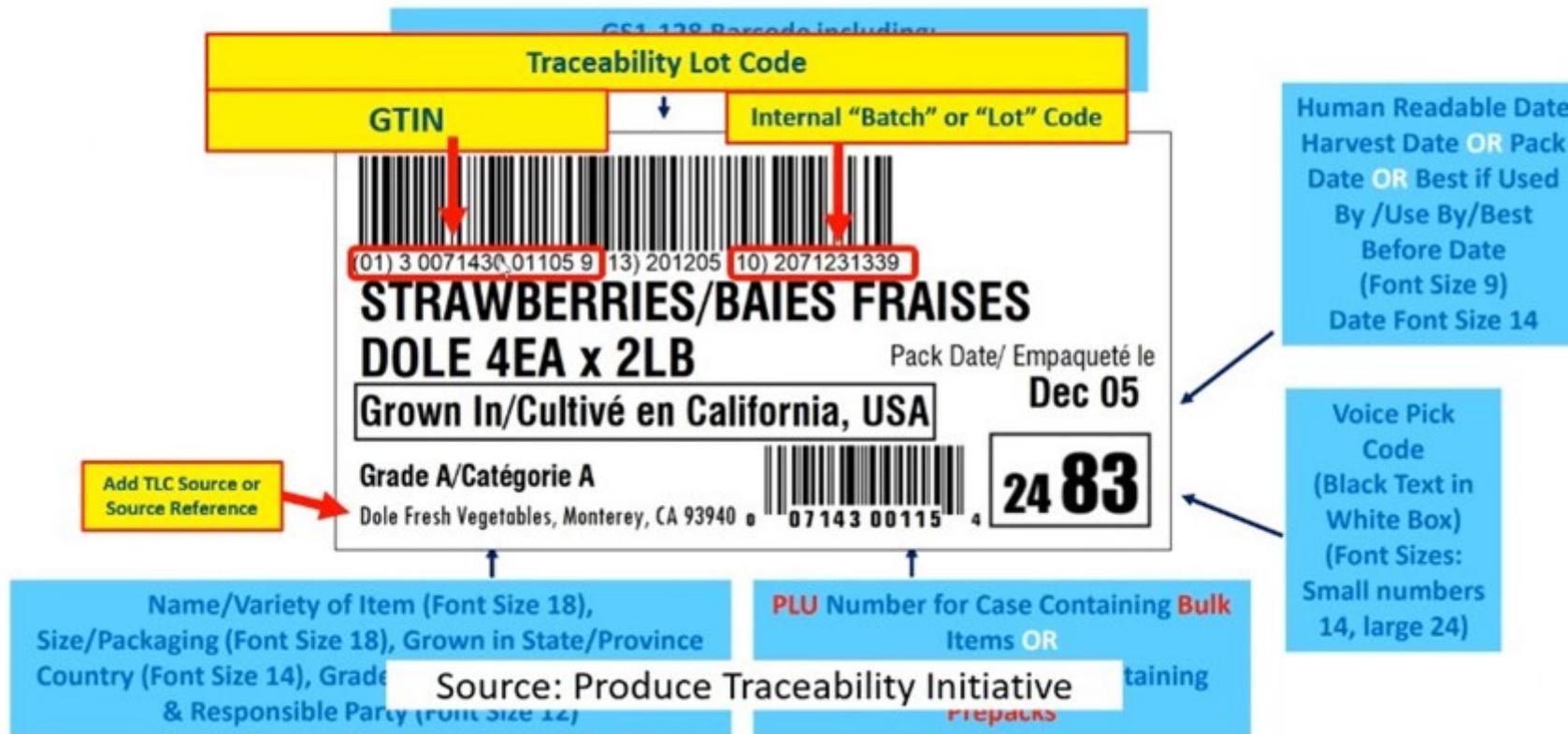
## Example

The UPC-A symbol below encodes the GTIN.



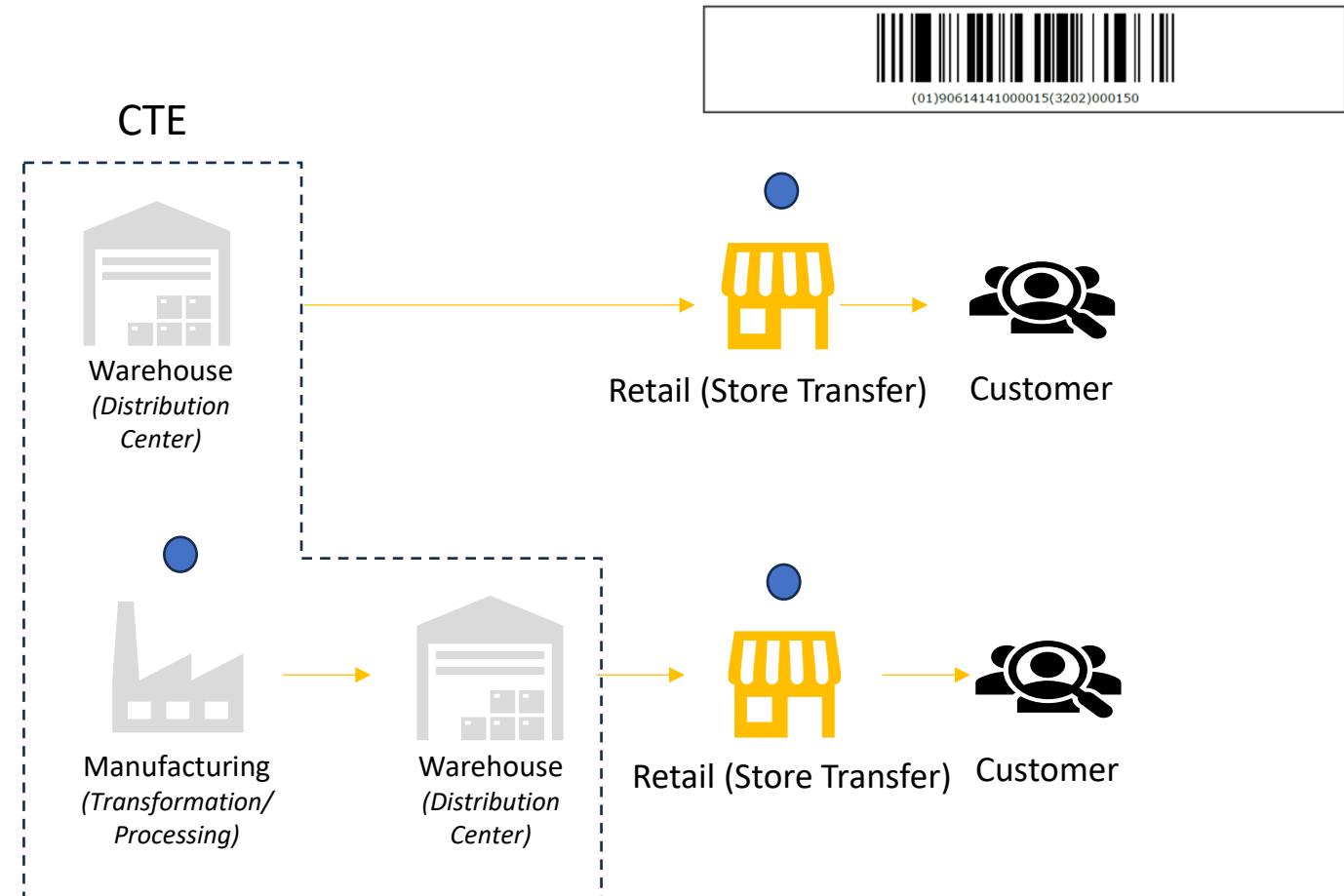
# Produce Traceability Initiative (PTI) Label

What is the difference between a batch/lot code and a Traceability Lot Code?  
Will the PTI label change? Considering options for TLC Source/Reference



# Impact to Industry

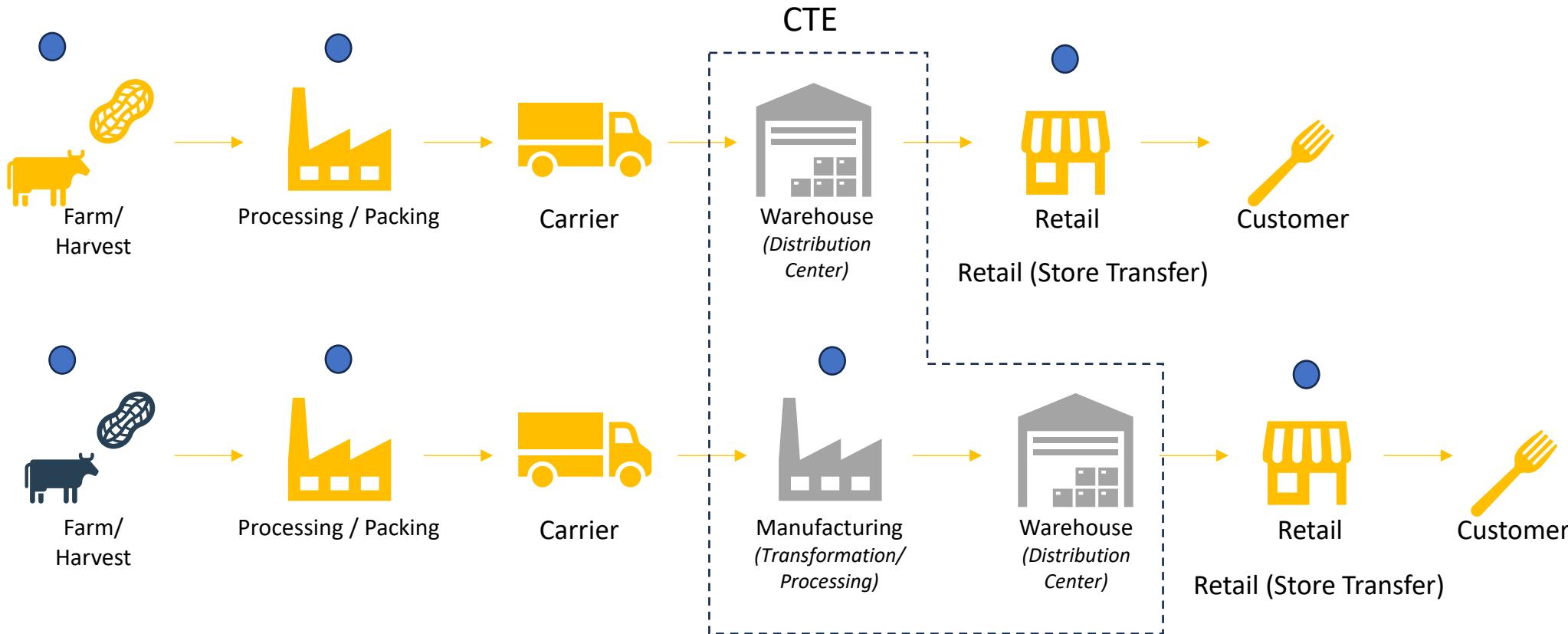
# Impact to Retail Industry



- ✓ The receiving and shipping of products at and from Distribution & Manufacturing facilities is what FSMA 204 (d) calls a Critical Tracking Event (CTE)
- ✓ The Traceability Lot Code Source is a Key Data Element

● = Origin Traceability Lot Code Creation

# Nut Butters/Cheese Example



● = Origin Traceability Lot Code Creation

**This is where warehouses receives products from suppliers.**

- ✓ Manufacturing Plant and Distribution Center Receiving and Shipping are considered a “Critical Tracking Event (CTE)”
- ✓ KDEs will need to be captured and stored during the receiving processes
- ✓ This data will need to be available for reporting or track and trace activity
- ✓ Lot code information should be able to be tracked at the store shipment level

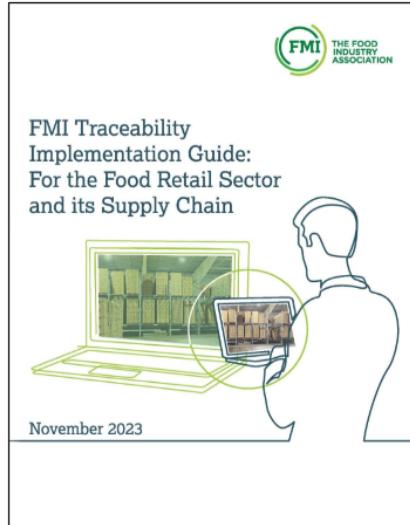
# Current State

# Industry Status/"Big Rocks"

- Most Retailers:
  - Can provide information today but its not “bright”
  - Will require suppliers to label with the **128 Barcode**
  - Have began to communicate with Suppliers, **DSD providers**, Internal Procurement Individuals
  - Are starting to work on **systems**, new configurations, updates and requirements for capturing data
  - Continue to collaborate with other retailers in the **industry**
  - Continue to meet with FDA either directly or via representation
  - Will be working on this up to the deadline
  - **Pallet Ties / Comingling / Multiple Lot Codes**

# Resources

# FMI Resources



Barbara S. Thesmar (FMI)

<https://www.fmi.org/food-safety-modernization-act-resource-center/traceability>

www.fmi.org 5

- GS1
- Leafy Greens Safety Coalition
- Food Marketing Institute
- Produce Traceability Initiative
- FDA - FSMA Final Rule on Requirements for Additional Traceability Records for Certain Foods

[Home](#) > [Industries & Insights](#) > [GS1 US Meeting the Needs of Foodservice](#) > [Standards in Use](#) > [Food Safety](#)

## Enable Food Traceability for Enhanced Safety

Food safety risks exist throughout the supply chain – making product and location identification critical to see where it has been and where it is going.



The Food Safety Modernization Act (FSMA), Rule 204 is published

GS1 Standards can help you prepare.

Start now and get the resources you need to meet the deadline of January 2026!

Understand who in your organization to involve, what steps are needed and what resources are available with our readiness checklist.

[Get More FSMA 204 Resources](#)

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Thank You



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