

FSMA 204 Traceability – Coming Together for Compliance

JUNE 24, 2025

The primary goal:

- **A shared, overarching vision for food traceability across the supply chain**

The primary objectives:

- Facilitate implementation of compliant traceability programs
- Adoption of interoperable electronic traceability systems for FTL foods
- While maintaining the flexibility to accommodate and support alternate and non-electronic methods for small businesses.

- A forum for **technical implementation discussions** between **industry and FDA**.
- A **decision-making mechanism** for critical questions of how traceability should be implemented.
- A **common vision** for traceability across sectors, associations, and consortia.
- A **consistent set of business and functional requirements** for traceability that provides clarity to solution providers and ensures solutions meet business needs.
- An organized **public-private plan** for how the industry will **migrate** to compliance, optimization, and interoperability.

1

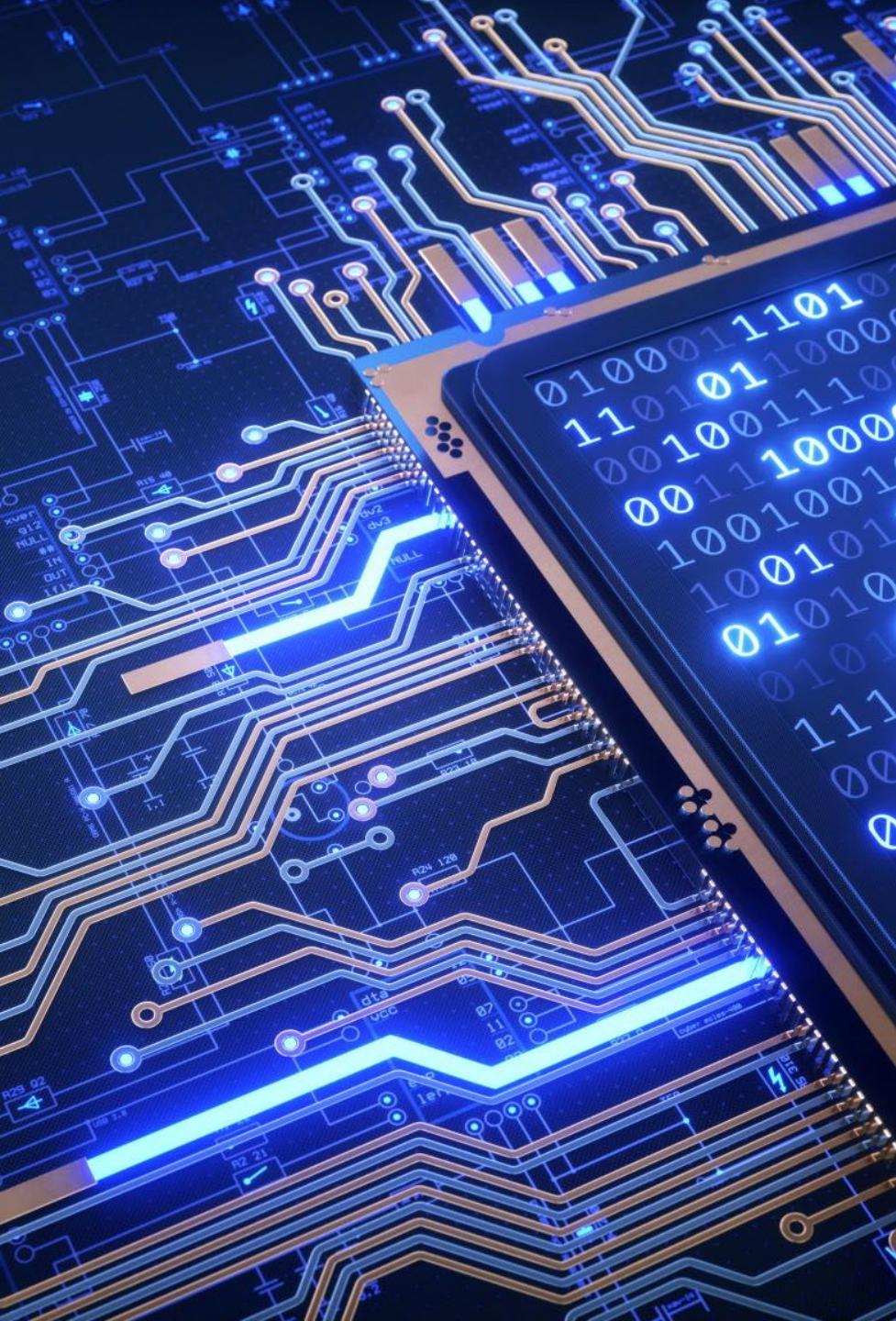
Define open-source consensus business requirements and functional requirements for food traceability.

2

Coordinate pilots and share pilot learnings to advance electronic traceability.

3

Provide a forum for sharing common practices in setting supplier requirements for data sharing.



Blueprint for Interoperability

- Serves as a practical guide for companies subject to the Traceability Rule to support their implementation and progress toward interoperable electronic traceability
- Sets forth the PFT-defined compliance requirements and business requirements for interoperable electronic traceability, which are captured in the form of requirements and recommendations
- Serves as an optimal approach to implementation that companies will opt to follow

Good

Approaches and methodologies that enable a company to meet the compliance requirements of Traceability Rule and incorporate alternate methods for interfacing with those companies pursuing electronic interoperability

Better

Approaches and methodologies that provide a foundation for electronic interoperability upon which a company early in its traceability journey can continue to build toward full electronic interoperability

Best

The optimal end state for approaches and methodologies that enable fully interoperable traceability throughout the supply chain

Product Identifier—*DRAFT*



The full supply chain shall move toward the use of a globally unique Global Trade Item Number (GTIN) to identify products in the exchange of data related to a CTE. The use of a GTIN will enable the KDEs Commodity Type, Variety Type, Product Description, Species and/or Acceptable Market Name, and Unit of Measure to be managed as master data through individual company systems and process.

GOOD	BETTER	BEST
<p>Companies SHALL:</p> <ul style="list-style-type: none">• Capture all product KDEs (Product Name; Brand Name; Commodity Type; Variety Type; Species and/or Acceptable Market Name (for seafood); Packaging Size; Packaging Style) for each CTE in which they are involved;• Implement a standardized process for capturing those KDEs;• Align on the standardized process for capturing and sharing KDEs with each of its customers/suppliers; and1. Coordinate with its customers and suppliers to align on KDE formats to promote consistent product descriptions throughout the supply chain.	<p>A GTIN SHALL be assigned to FTL foods beginning from the point the FTL food is packaged in end-consumer packaging and used to identify FTL foods for all CTEs subsequent to that point.</p> <p>Prior to assignment of a GTIN, the FTL food SHOULD be identified by a product code, which may be a GTIN or other standardized or proprietary code. The entity that first assigns the GTIN to an FTL food SHALL have processes in place to link that GTIN to the product code that was assigned to the food prior to transformation.</p>	<p>A GTIN SHALL be used to identify FTL foods for all CTEs.</p> <p><i>*Note: A virtual GTIN can be utilized prior to initial packing.</i></p>

Party / Location Identifier—*DRAFT*



Good	Better	Best
<p>Name, address, and phone can be used as the product identifier.</p> <p>Beginning at the point at which a GTIN is assigned to a product, a GLN is the preferred location identifier. A party or location identifier can also be a web url or a universally unique identifier (UUID).</p> <p>A GLN is recommended, but not required for the final party/location in the supply chain.</p>	<p>Beginning at the point at which a GTIN is assigned to a product, a GLN is the preferred identifier. A party or location identifier can also be a web url or a universally unique identifier (UUID).</p> <p>A GLN is recommended, but not required for the final party/location in the supply chain.</p>	<p>Beginning at the point at which a GTIN is assigned to a product, a GLN SHALL be used as the location identifier.</p> <p>A GLN is recommended, but not required for the final party/location in the supply chain.</p>

Good	Better	Best
<p>The TLC Source/Reference SHOULD be affixed to cases and other logistical units.</p> <p>A GLN or url is the preferred TLCSR.</p> <p>When used, a url SHALL be static by Company. (*co-packer, conglomerates)</p>	<p>The TLC Source/Reference SHOULD be affixed to cases and other logistical units in a human readable format and encoded in a barcode.</p> <p>A GLN or url is the preferred TLCSR.</p> <p>When used, a url SHALL be static by Company.</p>	<p>The TLC Source/Reference SHALL be affixed to cases and other logistical units in a human readable format and encoded in a barcode.</p> <p>A GLN or url SHALL be used as the TLCSR.</p> <p>[For future discussion with exchange model, desire to move to a model that allows the TLCSR to be looked up with the producer]</p> <p>When used, a url SHALL be static by Company.</p>

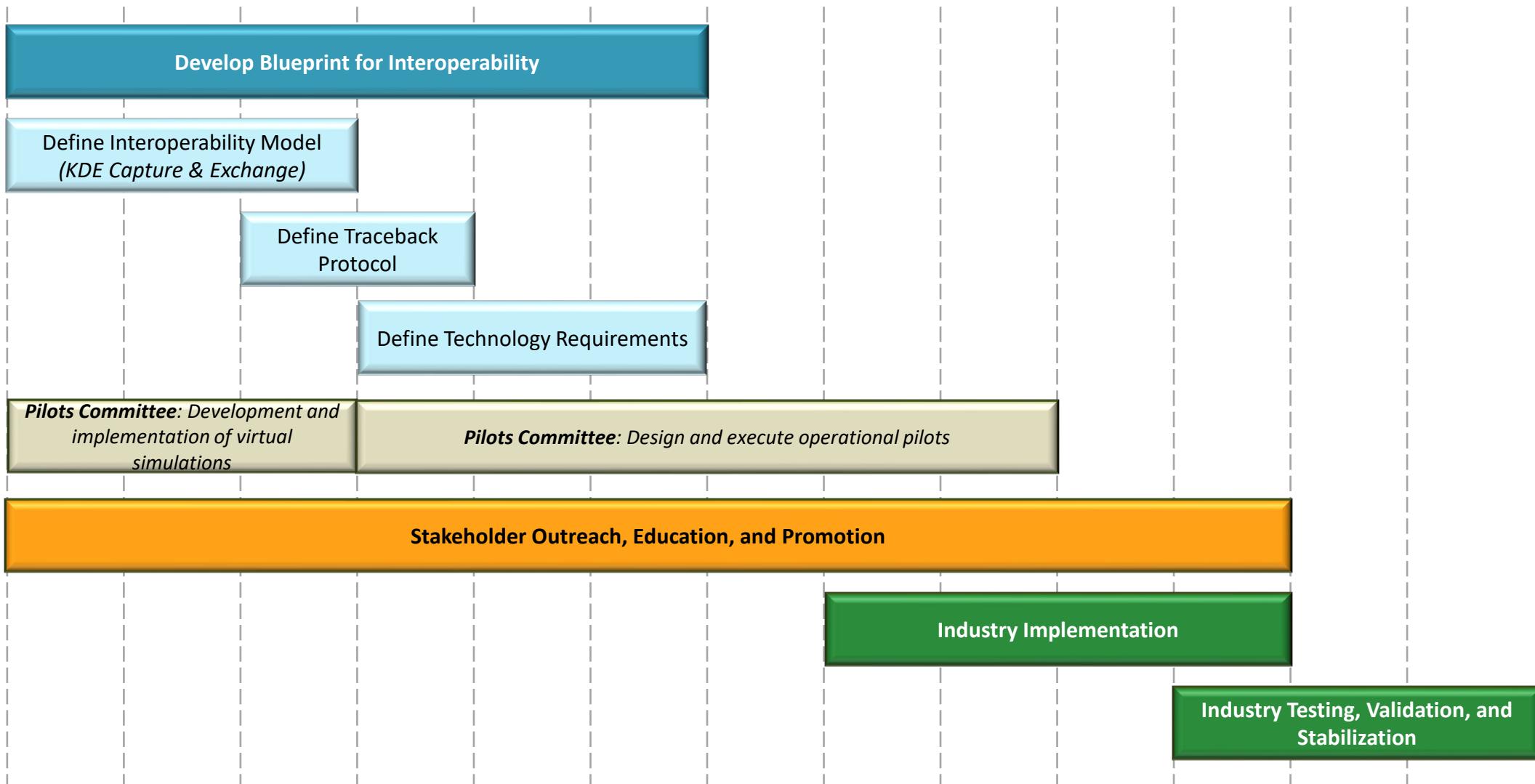


Timeline

Proposed timeline – Traceability and Pilots Committee



2Q25 3Q25 4Q25 1Q26 2Q26 3Q26 4Q26 1Q27 2Q27 3Q27 4Q27 1Q28 2Q28 Jul 2028



About Us



The Partnership for Food Traceability (PFT) offers a unique opportunity to collaborate across the entire food supply chain, from producers to retailers, technology vendors to industry experts. PFT is an independent, sector-neutral forum where critical decisions on food traceability are made and includes participation from FDA, state, and local officials.

To join, please visit pftraceability.org

To learn more, please reach out to Laura Brown at Laura.Brown@leavittpartners.com