

# FSMA 204 Traceability – Coming Together for Compliance

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JUNE 24, 2025

# Overarching PFT Goals



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.

# Why PFT is Unique



- 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.

# What We Do

**1**

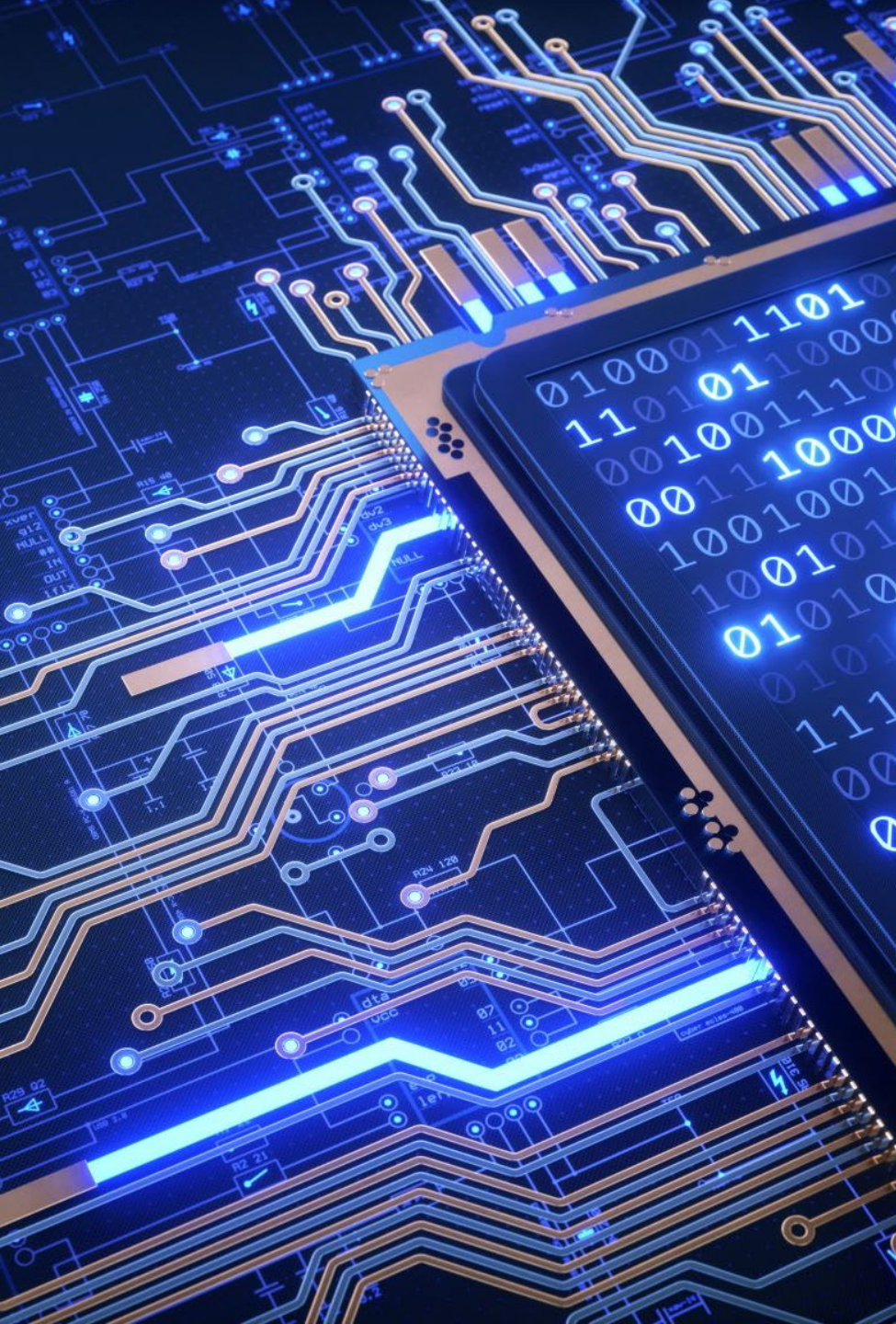
**Define open-source consensus business requirements and functional requirements for food traceability.**

**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

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- 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



*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 <b>SHALL</b>:</p> <ul style="list-style-type: none"> <li>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;</li> <li>Implement a standardized process for capturing those KDEs;</li> <li>Align on the standardized process for capturing and sharing KDEs with each of its customers/suppliers; and</li> </ul> <ol style="list-style-type: none"> <li>Coordinate with its customers and suppliers to align on KDE formats to promote consistent product descriptions throughout the supply chain.</li> </ol>	<p>A GTIN <b>SHALL</b> 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 <b>SHOULD</b> 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 <b>SHALL</b> 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 <b>SHALL</b> 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>



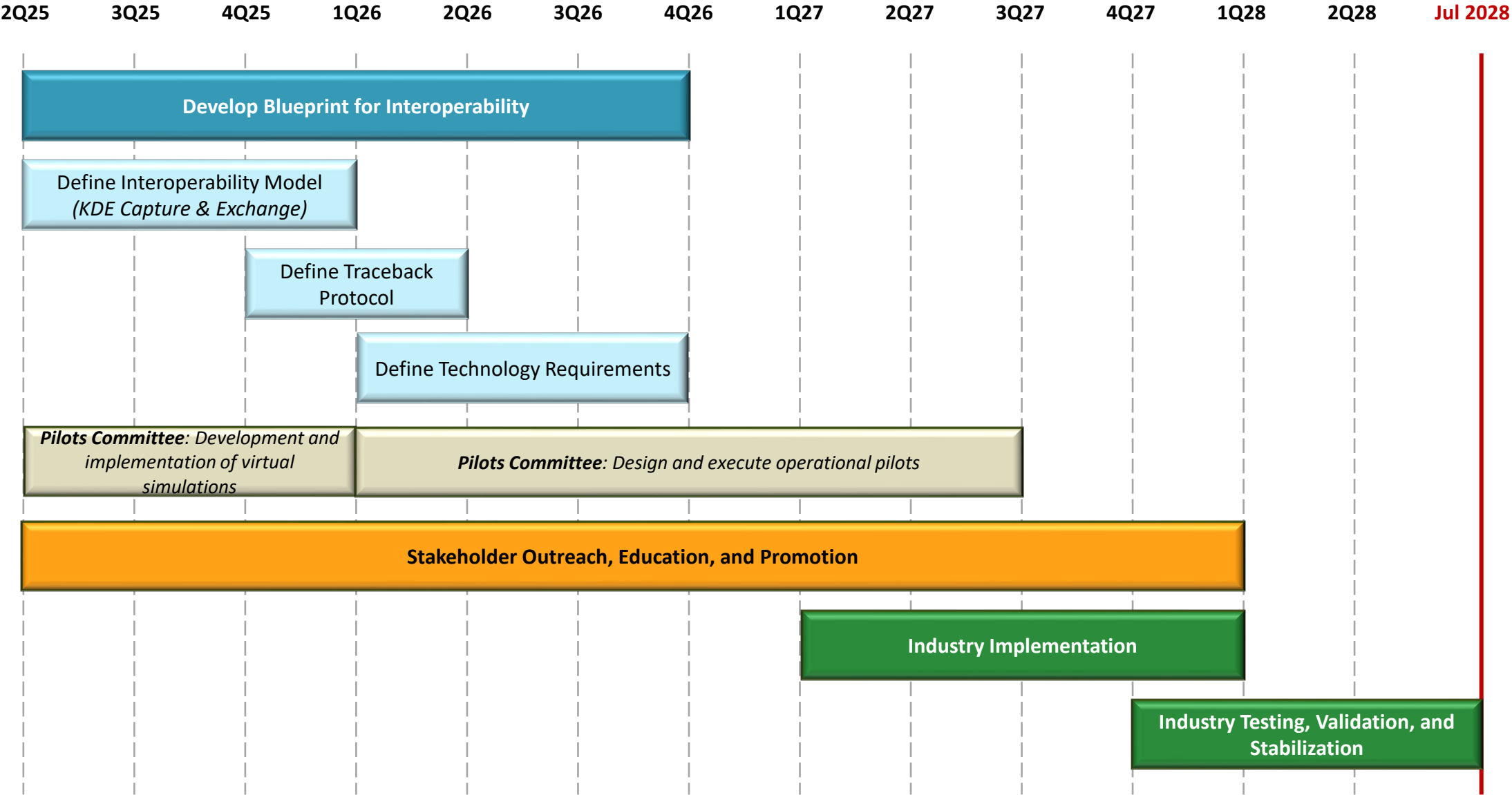
Good	Better	Best
<p>The TLC Source/Reference SHOULD be affixed to cases and other logistical units.</p> <p>A GLN or url is the preferred TLCSR.</p> <p>When used, a url SHALL be static by Company. (*co-packer, conglomerates)</p>	<p>The TLC Source/Reference SHOULD be affixed to cases and other logistical 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

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# Proposed timeline – Traceability and Pilots Committee



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.

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To join, please visit [pfttraceability.org](https://pfttraceability.org)

To learn more, please reach out to Laura Brown at [Laura.Brown@leavittpartners.com](mailto:Laura.Brown@leavittpartners.com)