FSMA 204 guide for food packers

Simplify compliance with digital traceability



Foodborne illness is a big problem.

Why food traceability matters

Every year in the US:



128,000 people are hospitalized

because of a foodborne illness²

The Food Safety Modernization Act (FSMA) was created in 2011 to

3,000 people die from a foodborne illness³

ensure safety in the US food supply by preventing contamination, enhancing traceability and demanding transparency.

FSMA 204?

What is



Rule, facilitates the fast identification and removal of contaminated food from the market. The original compliance date was January 20, 2026, but the FDA has proposed to extend it to July 20, 2028.

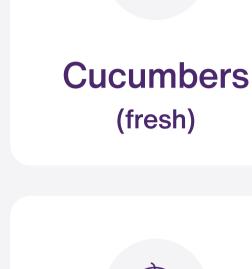
FSMA section 204, known

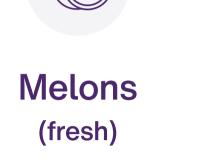
as the Food Traceability

Here are some key examples of fresh produce aisle foods on the traceability list that packers often handle:

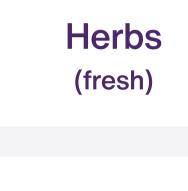
Fresh produce foods

on the traceability list



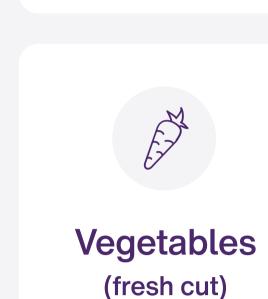


with FSMA 204



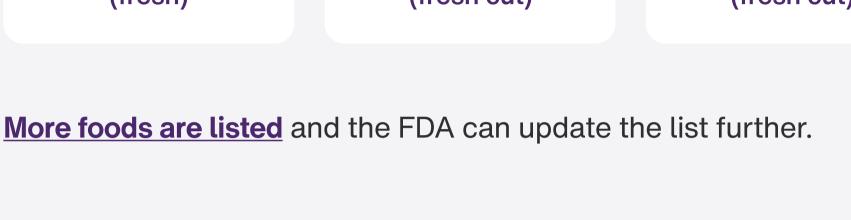
(fresh cut)

Fruits



Leafy greens

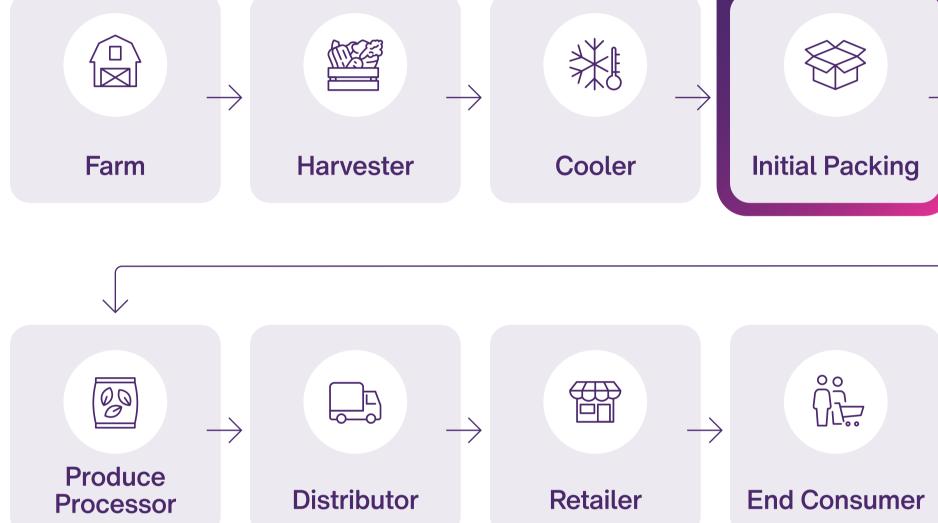
(fresh and fresh cut)



Why packers must comply

How packers handle food is critical and can lead to contamination. As a result, they will be required to comply with FSMA 204 to ensure consumer safety and to maintain supply chain traceability and transparency.

Initial Packing KDEs Shipping KDEs



What packers have to do

where traceability data must be collected. They **Tracking Events** mark a significant movement or change to a food product. (CTEs) Capturing key data at the following CTEs may

To comply with FSMA 204, packers need to*:



Capture Key Data Elements (KDEs)

Determine Critical

KDEs record important details related to a product's CTEs. Packers may need to capture: Initial Packing CTE

CTEs are defined points in the food supply chain

be necessary for packers:

Product Description

Traceability Lot Code (TLC)

 Date of Harvest Harvest Location

Previous Source

Date and Location

Shipping CTE

Recipient

Initial Packing

Shipping

Packers must create and maintain a written

How they maintain their records, including

How they assign TLCs to foods on the FTL

Contact information for the traceability

What they do to identify any Food Traceability

Packers must maintain required records and send

All required records and any information needed

the following to the FDA within 24 hours of a

traceability plan that describes:

record format and location

List (FTL) foods that they pack



Comply with the

24-hour rule

Maintain a

request:

Packers may face challenges complying with FSMA 204 if they:

Engage in

product mixing,

sorting and

repackaging

to interpret them

plan manager



for packers

Conduct manual

recordkeeping

(paper logs,

spreadsheets)

- An electronic, sortable spreadsheet of traceability information to assist during an outbreak, recall or other public health threat
- Common challenges

Pack commodities

that require

temperature and

environmental

control data

integration

Have limited

visibility into supplier or

downstream

partner systems

Packers can simplify

With the right digital solution, packers can: **⊘** Save time

⊘ Reduce errors

⊘ Increase visibility

⊘ Strengthen partnerships



the process

- and communication **⊘** Mitigate risk **⊘** Simplify reporting
- How to get started

The sooner you reorganize your packing operations to comply with FSMA 204, the better. Here's how to start: Identify all FTL products that you pack Record your CTEs Identify any data gaps Implement a digital traceability solution O Run a mock recall test

FSMA 204 requirements

Rest easy knowing you're meeting all

Document your traceability plan

Futureproof your food safety **TELUS Food Safety** & Quality can help

improve traceability

for your operations.

Kickstart your compliance

reduce risk and



Action

Return to

vendor

1-3 California Department of Public Health. "Foodborne Illnesses and Outbreaks." 4-5 Global Market Insights Inc. "Food Traceability Market - By Component (Hardware, Software, Services), By Deployment Mode (Cloud Based, On-Premises, Hybrid), By Technology, By Software, By Application &

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Quality control check report

66.3%

Major (Ranging from 1 piece

(0.5 oz) to 8 pieces (9 oz

pieces (1 oz) to 8 pieces (9 oz 100%) per pack)

100%) per pack) Major (Ranging from 2

Minor defects

Major defects

Mold present

Bruising

Forecast, 2024 - 2032." Global Market Insights, July 2024. * Always refer to the official FDA Food Traceability Final Rule (FSMA 204) and consult the actual regulation

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