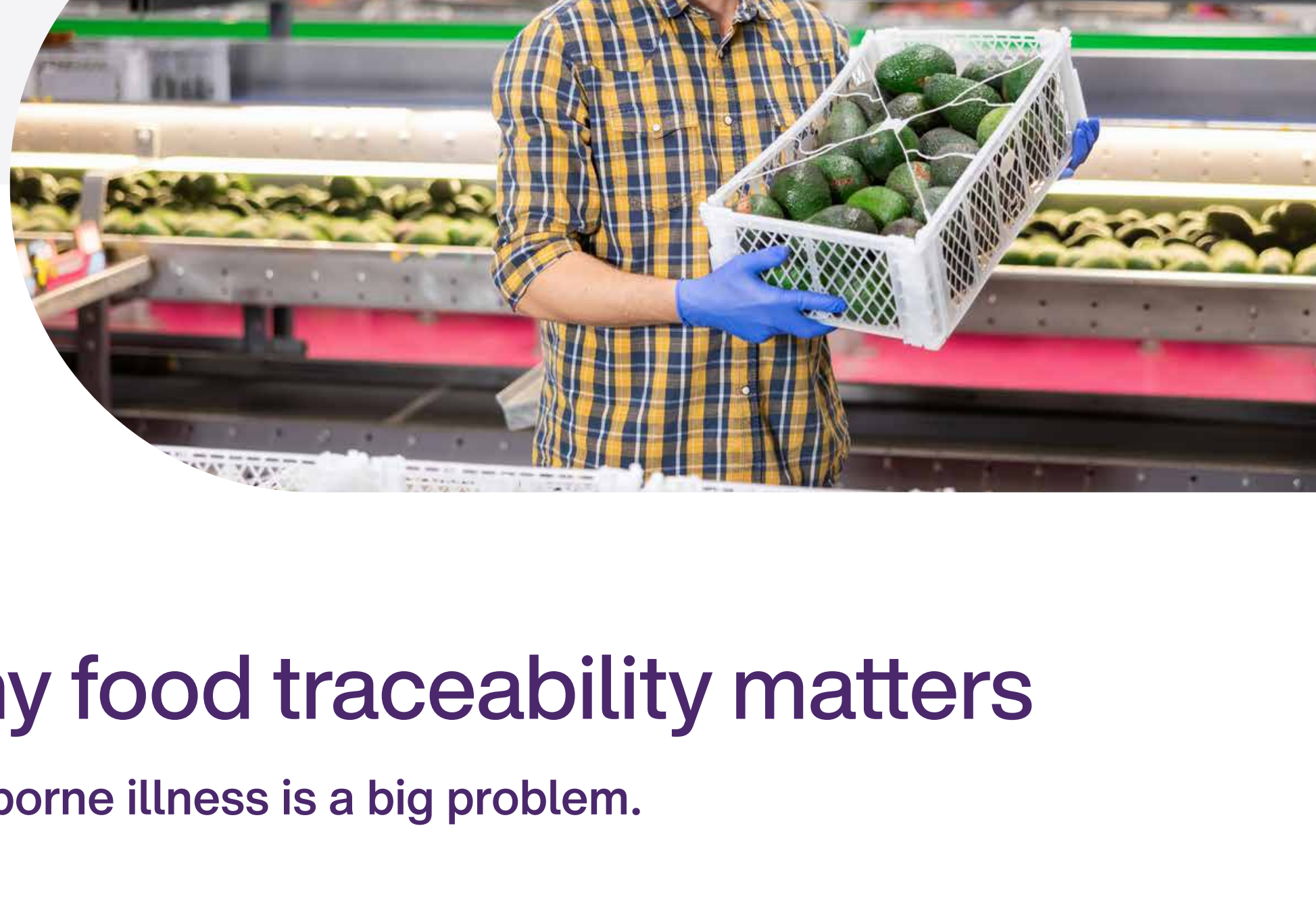


# FSMA 204 guide for food packers

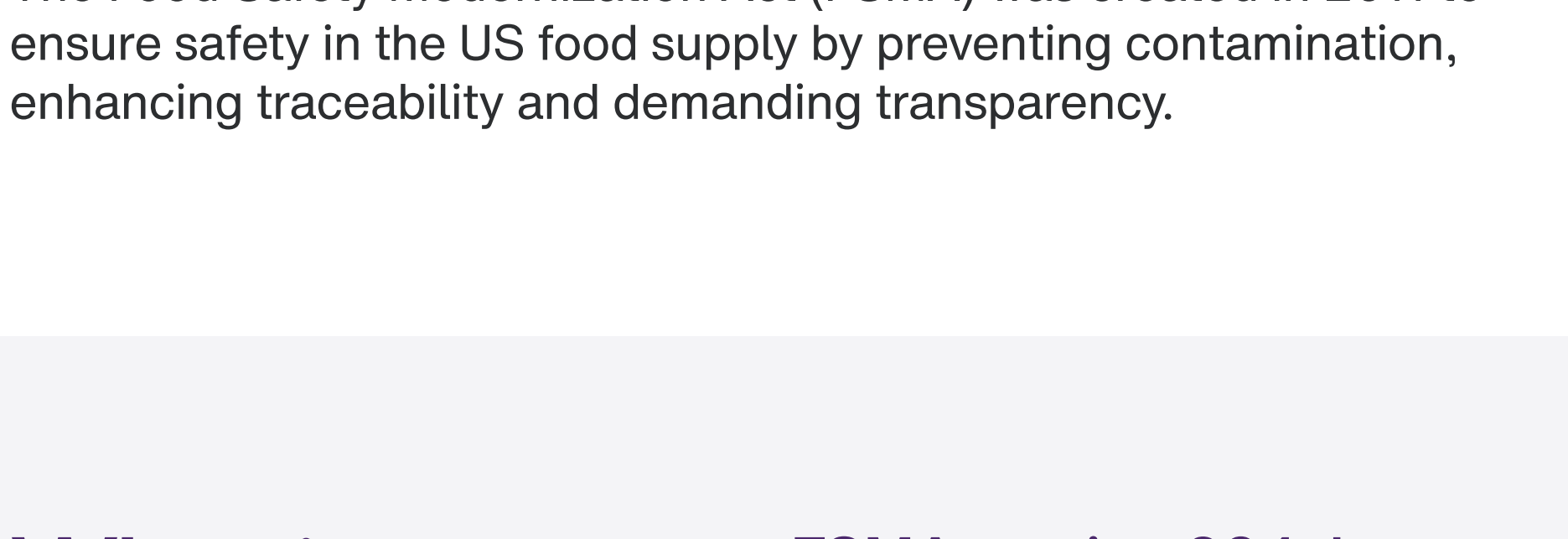
Simplify compliance with digital traceability



## Why food traceability matters

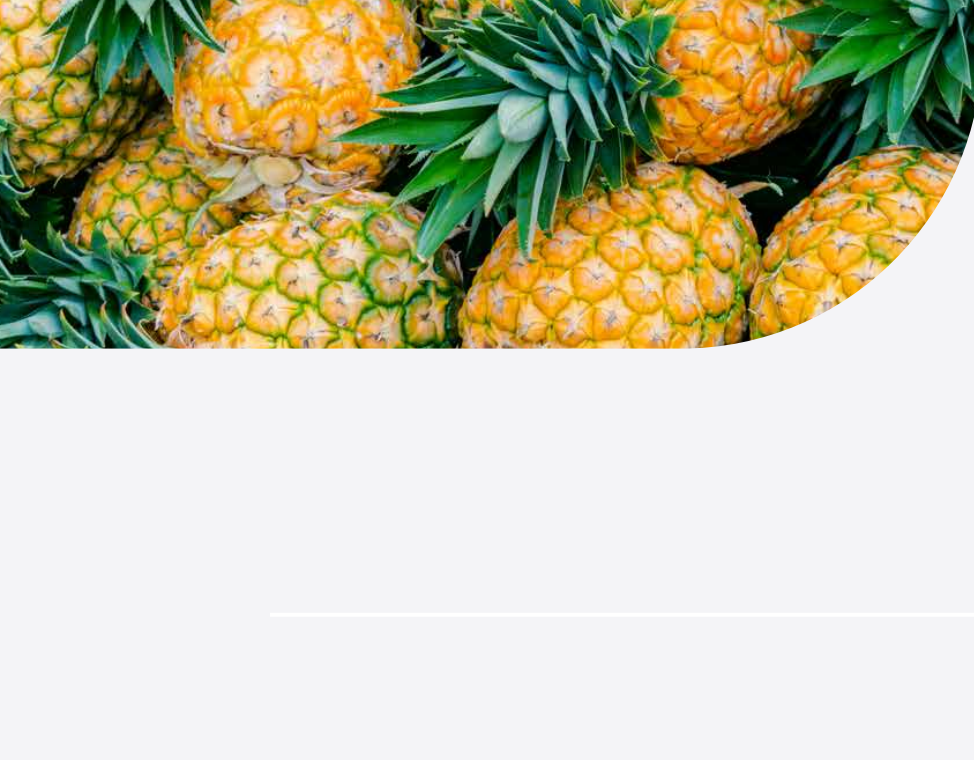
Foodborne illness is a big problem.

Every year in the US:



The Food Safety Modernization Act (FSMA) was created in 2011 to ensure safety in the US food supply by preventing contamination, enhancing traceability and demanding transparency.

## What is FSMA 204?

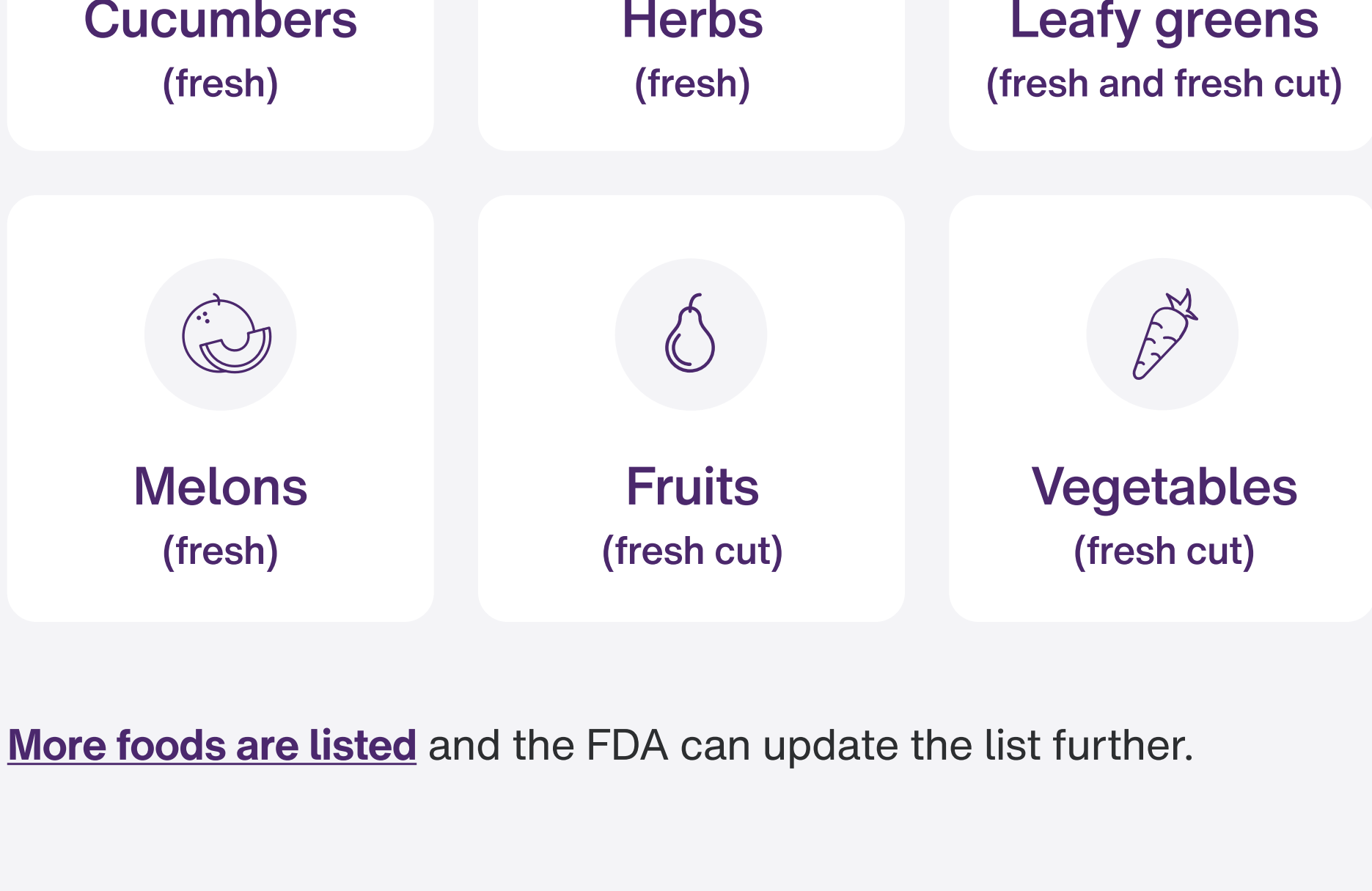


FSMA section 204, known as the **Food Traceability Rule**, facilitates the fast identification and removal of contaminated food from the market. The original compliance date was January 20, 2026, but the **FDA has proposed to extend it to July 20, 2028.**



## Fresh produce foods on the traceability list

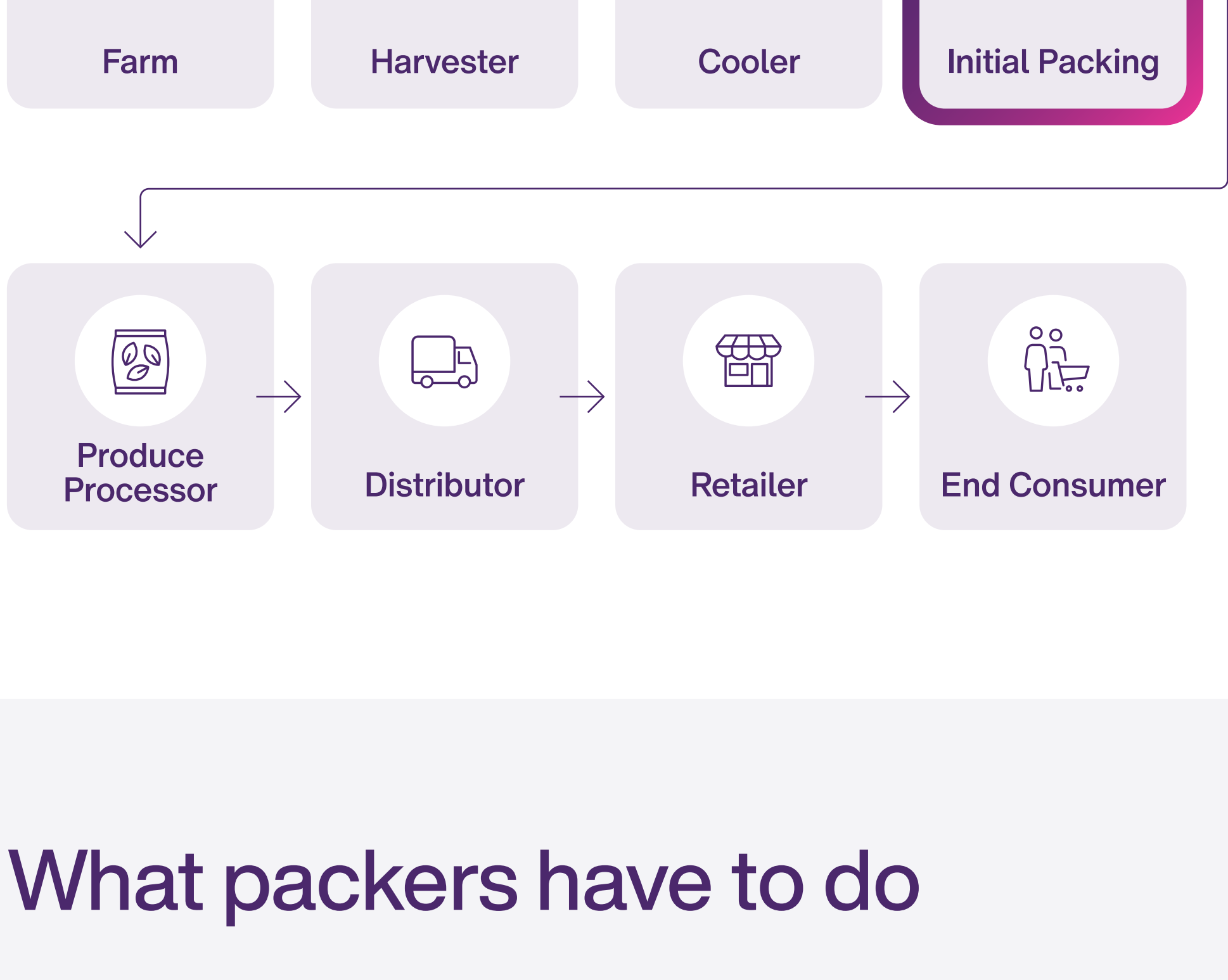
Here are some key examples of fresh produce aisle foods on the traceability list that packers often handle:



**More foods are listed** and the FDA can update the list further.

## Why packers must comply with FSMA 204

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.



## What packers have to do

To comply with FSMA 204, packers need to\*:

### Determine Critical Tracking Events (CTEs)

**CTEs** are defined points in the food supply chain where traceability data must be collected. They mark a significant movement or change to a food product.

Capturing key data at the following CTEs may be necessary for packers:

- Initial Packing
- Shipping

### Capture Key Data Elements (KDEs)

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

**Initial Packing CTE**

- Product Description
- Date of Harvest
- Harvest Location
- Traceability Lot Code (TLC)

**Shipping CTE**

- Previous Source
- Date and Location
- Recipient

### Maintain a written traceability plan

Packers must create and maintain a written traceability plan that describes:

- How they maintain their records, including record format and location
- What they do to identify any Food Traceability List (FTL) foods that they pack
- How they assign TLCs to foods on the FTL
- Contact information for the traceability plan manager

### Comply with the 24-hour rule

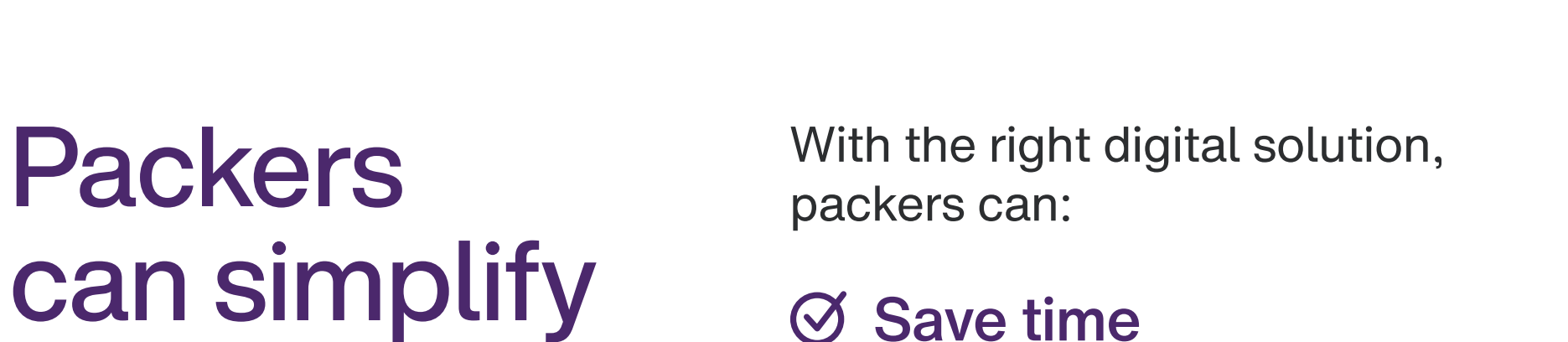
Packers must maintain required records and send the following to the FDA within 24 hours of a request:

- All required records and any information needed to interpret them
- An electronic, sortable spreadsheet of traceability information to assist during an outbreak, recall or other public health threat



## Common challenges for packers

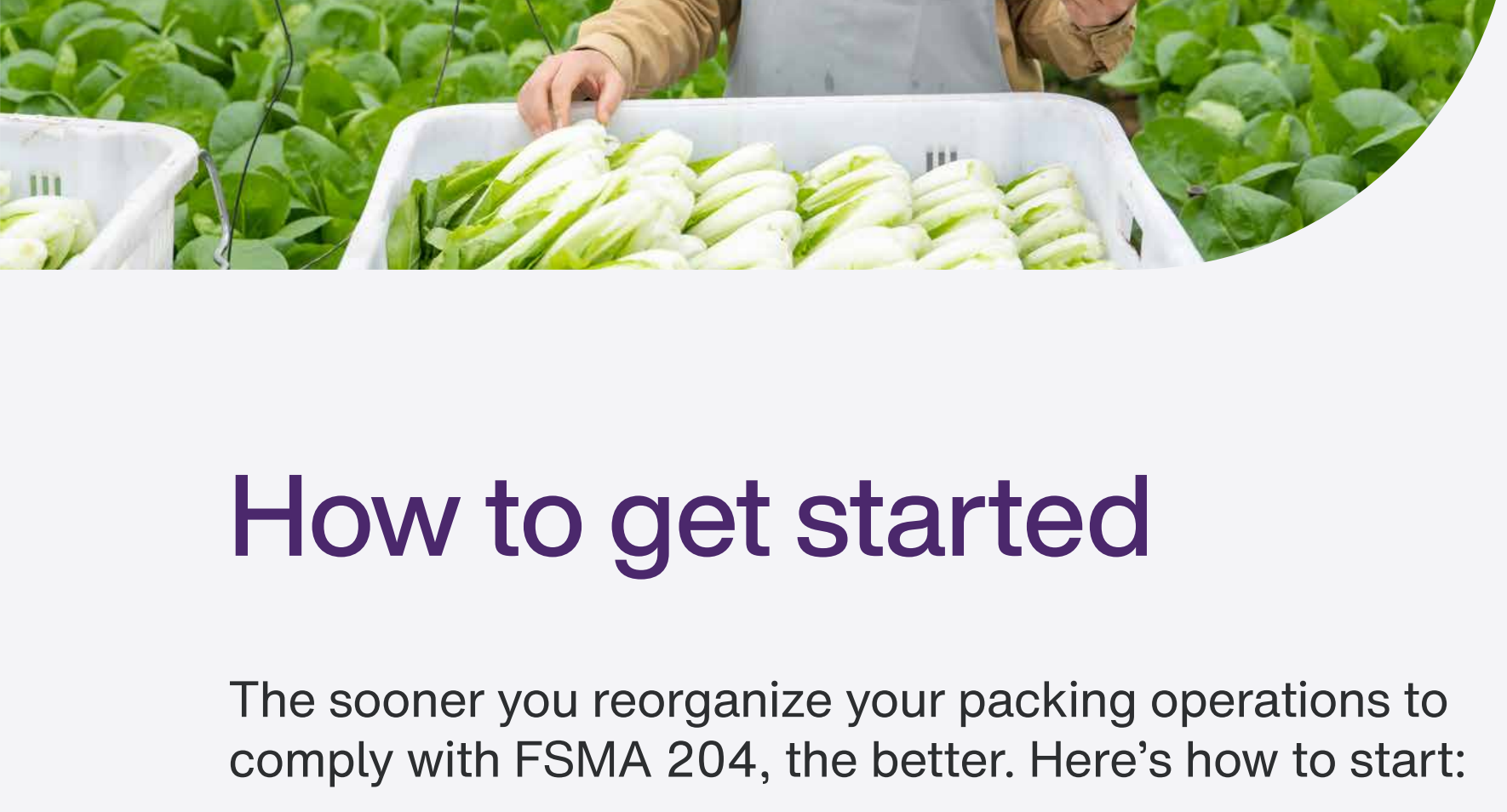
Packers may face challenges complying with FSMA 204 if they:



## Packers can simplify the process

With the right digital solution, packers can:

- ✔ Save time
- ✔ Reduce errors
- ✔ Increase visibility
- ✔ Strengthen partnerships 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
- Run a mock recall test
- Document your traceability plan
- Rest easy knowing you're meeting all FSMA 204 requirements

## Futureproof your food safety

TELUS Food Safety & Quality can help reduce risk and improve traceability for your operations.

[Kickstart your compliance](#)

