FSMA 204: Traceability is a Team Effort

Food Safety Summit
May 11, 2023
Bringing together the pioneering achievements of two amazing products - Genesis and FoodLogiQ – Trustwell is setting a new standard for compliance, transparency and quality in the food industry – all the way from recipe to recall.
Who is Affected:

FSMA 204 is a requirement for those who:
• Manufacture
• Process
• Pack or
• Hold foods

on the Food Traceability List
Food Traceability List (FTL)

• Identified foods:
  1. Cheeses (other than hard cheeses)
  2. Crustaceans (fresh and frozen)
  3. Cucumbers (fresh)
  4. Finfish (fresh and frozen)
  5. Fruits (fresh cut)
  6. Herbs (fresh)
  7. Leafy Greens (fresh)
  8. Leafy Greens (fresh-cut)
  9. Melons (fresh)
  10. Molluscan shellfish, bivalves (fresh and frozen)
  11. Nut butters
  12. Peppers (fresh)
  13. Ready-to-eat deli salads (refrigerated)
  14. Sprouts (fresh)
  15. Shell eggs
  16. Smoked Finfish (refrigerated and frozen)
  17. Tomatoes (fresh)
  18. Tropical Tree Fruits (fresh)
  19. Vegetables other than leafy greens (fresh-cut)

• Applies to foods listed on the FTL, and foods that contain these items as ingredients
• FDA will update the FTL. Any additions become effective in 2 years, deletions are effective immediately

What Are The Data Requirements?

Traceability records must be maintained, legible and stored for **24 months**

If requested, data must be provided within **24 hours**

FDA defined Critical Tracking Events:

- Harvesting
- Cooling *(before initial packing)*
- Initial packing of raw agricultural commodity
- First land-based receiving of a food obtained from a fishing vessel
- Shipping
- Receiving
- Transformation
Understand Your Role(s)

• Required attributes vary by role and event type
• Captured and store data for 24 months
• Shipping events must be captured AND shared
• Watch for “hidden” roles in the supply chain i.e. Company-owned DCs, food facilities, commissaries, etc.
1. FSMA 204 requires lot-level information for FTL items
2. Includes a defined set of data attributes
3. Technologies and capabilities will vary
4. Companies must collaborate on approach
   • Review industry guidelines and best practices
   • Understand trading partner traceability program requirements
   • Utilize standards for interoperability
Timeline

- **Nov 2022**: 11/15/2022
  - FDA issues FSMA 204 Final Rule

- **Jan 2023**: 1/19/2023
  - Final Rule in effect

- **2023-2025**
  - Design, Implement, and Execute Plan

- **Jan 2026**: 1/20/2026
  - Compliance required for all parties
# Understanding What You Have – And What You Don't

## Capture Data

<table>
<thead>
<tr>
<th>Key features and functions for collecting and aggregating FSMA 204 information:</th>
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<tbody>
<tr>
<td>✓ Capture lot-level data for FTL items in your supply chain</td>
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<td>✓ Store required master data for products and locations</td>
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<td>✓ Flag items on the Food Traceability List</td>
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<td>✓ Ability to capture required Critical Tracking Events (CTEs) and Key Data Elements (KDEs)</td>
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<tr>
<td>✓ Flexible data loading options to support you and your trading partners including online, spreadsheet upload, FTP, EDI, API, Mobile app and more</td>
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## Analyze for Compliance

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<thead>
<tr>
<th>Value-added features for monitoring and complying with FSMA 204:</th>
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<tr>
<td>✓ Export to FDA-compliant electronic sortable spreadsheet, including event, product and location data</td>
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<td>✓ Monitor compliance by location, product and supplier</td>
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<td>✓ Resolve file failures through event submission exception reporting</td>
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<td>✓ FTL specific views to show missing product and location data via exception reports</td>
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<td>✓ Dashboard views with traceability widgets</td>
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<td>✓ &quot;Smart&quot; reports identify potential data quality issues</td>
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Thank You