

The Roadmap to FSMA 204 Compliance: Getting Started

The FDA Food Safety Modernization Act (FSMA), was the most sweeping reform of our food safety laws in more than 70 years. FSMA Section 204, finalized in November 2022, establishes additional traceability recordkeeping requirements, beyond those in existing regulations, for certain foods.

This regulation mandates that companies establish and maintain a traceability plan, describing their procedures for maintenance of records under the new requirements. This includes the assignment and capture of traceability lot codes, combined with other identifying data, to link shipments of certain foods in our supply chains. In order to handle the sheer volume of data, the FDA strongly encourages the use of electronic recordkeeping for traceability.

FoodLogiQ Traceability is the leading tech-enabled traceability platform for the food industry. Companies can collect, store and share FSMA-compliant traceability data through our cloud-based platform, leveraging industry-recognized best practices and standards for food traceability.

Getting Started:



1. Perform a top-level review of FSMA 204 requirements

- Assign FSMA 204 owners at your company.
- Review the final rule at www.fda.gov
- Attend FDA webinars and presentations.



2. Build out a product and ingredient assessment

- Review the Food Traceability List.
- What products or ingredients do you handle.
- Document processes to identify and manage FTL items.



3. Conduct technology and operations analysis

- Determine the role(s) your company owns.
- Develop a plan to obtain FTL data from your shippers.
- Assess whether your trading partners are FSMA-ready.



4. Map out your supply chain roles

- Identify the systems, hardware, and operations affected.
- Clarify ownership and access to data related to the supply chain.
- Conduct an inventory of data collection methods and identify gaps.



5. Determine what you do well, and where you need help

- Evaluate how FTL items are currently managed in your facilities.
- Create a strategy to capture required data, such as lot information.
- Talk to your customers, trading partners and solution providers about their approaches to FSMA 204.

Moving from partner requests to an FDA mandate

Prior to FSMA 204, the primary drivers for tech-enabled traceability were customer programs and industry initiatives. FSMA 204 now mandates the collection and sharing of traceability data.

FSMA 204 is a team effort

Collecting lot-level data for FTL items will require participation from all levels of the food chain. Agreeing on common, consensus-based standards will benefit all and reduce "one-off" solutions, which are costly and time-consuming. Standards provide the capability to be compliant with initiatives and regulations, and the flexibility for systems to be interoperable.

Why Trustwell as your FSMA 204 Compliance Partner?

Trustwell's FoodLogiQ Traceability software provides a flexible, cloud-based platform to collect, store, monitor and share FSMA-compliant Critical Tracking Event data for your products and ingredients at the lot level. Monitoring your own data, as well as data from your trading partners will be key to your success, and FoodLogiQ's powerful dashboards and reports ensure that you have visibility to what CTE data you have, and what may be missing. Trustwell follows industry best practices for traceability, including the Produce Traceability Initiative (PTI) and the Global Dialogue for Seafood Traceability (GDST).



What Will It Take

1. Data Gathering:

Trustwell's intuitive platform allows you and your trading partners to collect, store and share FSMA 204 compliant data. FoodLogiQ Traceability offers 7 different data loading methods to collect enhanced traceability data including API integrations, .CSV file import, and other common data import methods. This flexibility levels the playing field and removes barriers to adoption for you and your trading partners.

2. Data Export Capabilities:

The FDA is requesting that this enhanced traceability data be provided to them in a sortable spreadsheet within 24 hours of a request. This includes CTE data, product and location information, as well as other data elements. Trustwell users have this data at their fingertips, and utilizing our UI or API, can export data in seconds, where and when you need it.

3. Supply Chain Visibility:

FoodLogiQ Traceability stitches together software stitches together the Critical Tracking Events of your products and ingredients at the lot level to give you a complete visualization of your supply chain.



What Do You Need to Know About FSMA 204 Compliance?

- Tech-Enabed traceability is essential for competitive food businesses and provides business value beyond compliance and consumer protection.
- Companies are at risk if they do not understand their role and approach to capturing and sharing enhanced traceability data for high-risk foods.
- The traceability timelines are feasible with aggressive action on the planning and development of digital traceability programs.
- Advanced traceability record keeping is here to stay, this is only the beginning.





START YOUR CONSULTATION TODAY VISIT TRUSTWELL.COM TO GET STARTED.