



# FSMA Food Traceability Compliance Guide & Checklist

How Commport's EDI and GDSN Solutions Help Food Businesses Meet the FDA Food Traceability Final Rule

■ **FDA Enforcement Date: July 20, 2028**

**48M**

Americans affected by foodborne illness annually

**\$15.6B**

Annual economic cost of foodborne illness (US)

**24 hrs**

FDA record response window required by rule

**17**

High-risk food categories on Food Traceability List

**Produced by:** Commport Communications | [www.commport.com](http://www.commport.com)

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**Audience:** Food Industry Supply Chain, Compliance and IT Professionals

**Enforcement Date:** July 20, 2028

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## ■ About This Guide

This guide is produced by Commport Communications, a North American leader in EDI and GDSN solutions serving the food, grocery, retail, and consumer goods industries for over 40 years.

It is intended for supply chain managers, compliance officers, IT directors, and food business owners navigating the FDA FSMA Food Traceability Final Rule requirements.

Reference: 21 CFR Part 1, Subpart S | [FDA.gov/fsma](https://www.fda.gov/fsma)

## 1 What Is the FSMA Food Traceability Final Rule?

The **FSMA Food Traceability Final Rule** (21 CFR Part 1, Subpart S) was finalized by the FDA on **November 21, 2022**, implementing Section 204(d) of the Food Safety Modernization Act. It is the most comprehensive food traceability regulation ever enacted in the United States — a core pillar of the FDA's New Era of Smarter Food Safety Blueprint.

The rule requires any entity — domestic or foreign — that **manufactures, processes, packs, or holds foods on the Food Traceability List (FTL)** to maintain records containing Key Data Elements (KDEs) at each Critical Tracking Event (CTE), and provide those records to the FDA **within 24 hours** upon request.

### Core Requirements of the Rule

- **Maintain KDE records at each CTE** For every FTL food lot throughout the supply chain
- **Assign a Traceability Lot Code (TLC)** At initial packing, first land-based receipt (seafood), or transformation
- **Develop a written Traceability Plan** Describing your recordkeeping systems and practices
- **Respond to FDA data requests** Within 24 hours — or within an agreed-upon timeframe
- **Share KDE data with supply chain partners** To enable end-to-end traceability across the chain

#### ■ Compliance Date: July 20, 2028

Original date was January 20, 2026. Extended via the Continuing Appropriations Act of 2026.

FDA intends to comply with the July 20, 2028 enforcement date.

Do not wait — building compliant EDI and GDSN infrastructure takes months, not weeks.

Trading partners (retailers, distributors) are already requiring traceability data from suppliers.

### Who Is Covered?

The rule covers the entire farm-to-table continuum: **growers, packers, coolers, seafood harvesters, processors, distributors, wholesalers, importers, and retail food establishments**. Exemptions exist for very small businesses, farms below certain sales thresholds, and specific food forms (e.g., frozen products not on the FTL). Persons who **do not take physical possession** of FTL foods (e.g., certain import brokers) are generally not covered.

## 2 The Food Traceability List (FTL) — All 17 Categories

The **Food Traceability List (FTL)** identifies the specific high-risk foods for which additional traceability records are required. It was developed using a risk-ranking model considering the severity of foodborne illness and traceability challenges for each commodity. Requirements apply to foods on the FTL AND foods containing FTL ingredients (when the ingredient remains in the same listed form).

Food Category	Key Notes / Examples
<b>Soft &amp; Fresh Cheeses (pasteurized milk)</b>	Cottage cheese, cream cheese, ricotta, queso fresco, queso blanco, mascarpone. Excludes frozen/shelf-stable.
<b>Soft Ripened / Semi-Soft Cheeses (pasteurized milk)</b>	Brie, camembert, feta, mozzarella, blue cheese, muenster. Excludes frozen/shelf-stable.
<b>Cheeses from Unpasteurized Milk (non-hard)</b>	All non-hard cheeses made with unpasteurized milk. Excludes frozen or shelf-stable.
<b>Shell Eggs</b>	Domesticated chicken shell eggs only.
<b>Nut Butters</b>	All tree nut and peanut butters (shelf stable, refrigerated, frozen). Excludes soy/seed butters.
<b>Fresh Cucumbers</b>	All varieties of fresh cucumbers.
<b>Fresh Herbs</b>	Parsley, cilantro, basil, and all fresh herbs. Exemptions exist under 21 CFR 112.2.
<b>Fresh Leafy Greens</b>	Lettuce, spinach, kale, arugula, and all fresh leafy greens.
<b>Fresh Melons</b>	Cantaloupe, honeydew, watermelon, and all fresh melon varieties.
<b>Fresh Peppers</b>	Bell peppers, jalapenos, and all varieties of fresh peppers.
<b>Fresh Sprouts</b>	Bean sprouts, alfalfa sprouts, and all types of fresh sprouts.
<b>Fresh Tomatoes</b>	All varieties of fresh tomatoes.
<b>Fresh Tropical Tree Fruits</b>	Papaya, mango, and other tropical tree fruits (fresh only).
<b>Finfish (Fresh/Frozen — Raw Consumption)</b>	Fish intended for consumption without cooking: sushi, sashimi, ceviche grade.
<b>Crustaceans (Fresh/Frozen)</b>	Shrimp, crab, lobster, and other crustaceans.
<b>Molluscan Shellfish (Bivalves)</b>	Oysters, clams, mussels, scallops (fresh or frozen).
<b>Smoked Finfish</b>	Hot or cold smoked fish products (fresh or frozen).

Food Category	Key Notes / Examples
Ready-to-Eat Deli Salads	RTE salads made in a food establishment: pasta, egg, seafood, and other salads.
Sandwiches (with FTL ingredients)	RTE sandwiches containing FTL foods (e.g., fresh tomatoes, leafy greens).

■ **Key FTL Principle**

Foods in a NON-FTL form (e.g., canned tomatoes, frozen peppers) are NOT subject to the rule. However, the entity that transforms an FTL food into a non-FTL form must maintain Receiving KDEs. When a non-FTL ingredient is used to create an FTL finished product (e.g., deli salad), the creator of the finished product has full Transformation and Shipping CTE obligations.

### 3 Critical Tracking Events (CTEs) & Key Data Elements (KDEs)

A **Critical Tracking Event (CTE)** is a specific point in the food supply chain where traceability records must be captured. A **Key Data Element (KDE)** is a specific data field that must be recorded at each CTE. All KDEs must be linked to the **Traceability Lot Code (TLC)** and provided to the FDA within **24 hours** of a request. KDEs can be linked via database records, electronic spreadsheets, EDI transactions, or printed commercial documents (e.g., Bill of Lading).

Critical Tracking Event (CTE)	Required Key Data Elements (KDEs)
<b>Growing (Produce)</b>	Field/growing area location (city, state, country, or GPS); commodity & variety; harvest date; quantity & unit of measure; TLC and TLC Source (once assigned at packing).
<b>Cooling (Produce)</b>	Location where cooling occurred; commodity & variety; quantity; date of cooling; TLC and TLC Source (if assigned).
<b>Initial Packing (Produce)</b>	TLC (assigned here); TLC Source (packing facility location); commodity & variety; lot code; date of initial packing; quantity; growing location description.
<b>First Land-Based Receiver (Seafood)</b>	TLC (assigned here); TLC Source (location of receipt); species; quantity; date of receipt; name & location of fishing vessel or harvester.
<b>Receiving</b>	TLC received; TLC Source; commodity description (GTIN preferred); quantity; date received; business name & location of immediate previous source.
<b>Transforming</b>	New TLC (assigned here); location of transformation; new product description; quantity; date of transformation; TLCs of all FTL input foods used.
<b>Creating (RTE / Manufactured)</b>	Location where food was created; product description; date created; quantity; TLCs of all FTL input foods.
<b>Shipping</b>	TLC and TLC Source; product description; quantity shipped; ship date; business name & location of immediate subsequent recipient.

#### ✓ How EDI Satisfies the KDE Linking Requirement

The FDA accepts electronic messages (EDI transactions) as a valid method of linking KDEs. EDI 856 ASN — the Advance Ship Notice — is the primary vehicle for Shipping CTE compliance. It carries the TLC, TLC Source, product GTIN, quantity, ship date, and recipient location in a single structured electronic record — satisfying all Shipping CTE KDE requirements automatically.

## 4 The Traceability Lot Code (TLC) — The Linchpin of Compliance

The **Traceability Lot Code (TLC)** is an alphanumeric identifier — similar to a traditional lot number — that uniquely identifies a traceability lot within the records of the **TLC Source** (the entity that assigned it). Once assigned, the TLC must remain unchanged as food moves through the supply chain. It can only be changed if the food undergoes transformation into a new product.

TLC Assignment Trigger	Who Assigns It	TLC Source
Initial packing of produce (RAC)	The initial packer (farm-packer or separate packer)	Physical packing facility location
First land-based receipt of seafood from a fishing vessel	The first land-based receiver	Location of first receipt
Transformation of an FTL food into a new product	The processor/manufacturer performing transformation	Location of transformation

### GS1 Best Practices for TLC Implementation

Industry best practice — and the most interoperable approach — is to build TLCs using GS1 standards:

- **GTIN (Global Trade Item Number)** Globally unique product identifier — see [commport.com/what-is-a-gtin/](http://commport.com/what-is-a-gtin/)
- **GLN (Global Location Number)** Identifies the TLC Source physical location — see [commport.com/what-is-a-gln/](http://commport.com/what-is-a-gln/)
- **Internal lot code + date code** Firm-assigned lot code and Julian/best-by date
- **GS1-128 barcode label** Encodes TLC on cases and pallets — see [commport.com/what-is-the-gs1-128-label/](http://commport.com/what-is-the-gs1-128-label/)
- **SSCC (Serial Shipping Container Code)** Pallet-level tracking — see [commport.com/what-is-the-sscc-barcode-label/](http://commport.com/what-is-the-sscc-barcode-label/)

#### ✓ Commport GDSN: Your TLC Foundation

Commport's GS1-certified GDSN Datapool enables you to register, maintain, and synchronize GTIN-linked product data — providing the authoritative product identity that every TLC implementation depends on. When your GTIN data is clean and synchronized, your TLC records are reliable and auditable. Learn more: [www.commport.com/commport-services/commport-gdsn/](http://www.commport.com/commport-services/commport-gdsn/)

## 5 FDA Official Supply Chain Examples

The FDA has published **seven official supply chain example documents** showing exactly how the Food Traceability Rule applies across different food categories. These are the most authoritative reference for understanding your specific compliance obligations.

<b>Ex. 1</b>	<b>Wild-Caught Tuna (Seafood)</b> Source: FDA FSMA (Nov 2022)	TLC assigned at First Land-Based Receiver. Flows through seafood processor (Transformation CTE assigns new TLC), distribution center, and retail. KDEs linked via EDI 856 ASN at each Shipping CTE. First land-based receiver must capture vessel name, species, quantity, date, and location.
<b>Ex. 2</b>	<b>Fresh Cucumbers (Produce)</b> Source: FDA FSMA (Nov 2022 + Mar 2025)	TLC assigned at Initial Packing CTE. Farm maintains Growing KDEs. If farm is also the packer (combined operation), farm is the TLC Source. March 2025 update confirms: farm-packers bear Initial Packing CTE obligations in addition to Growing and Cooling KDEs.
<b>Ex. 3</b>	<b>Soft Cheese</b> Source: FDA FSMA (Nov 2022)	Milk is NOT on the FTL. TLC is assigned at the Transformation CTE (when milk becomes soft cheese). The cheese manufacturer is the TLC Source. Distributor and retailer maintain Receiving KDEs linked to the manufacturer's TLC.
<b>Ex. 4</b>	<b>Deli Salads (2 scenarios)</b> Source: FDA FSMA (Oct 2023)	Scenario A: Deli salad with FTL ingredients — processor maintains Receiving, Transformation, and Shipping KDEs. Scenario B: Tuna salad with canned tuna (non-FTL) — no Receiving KDEs for canned tuna, but full Transformation + Shipping KDEs for the finished deli salad.
<b>Ex. 5</b>	<b>Sprouts</b> Source: FDA FSMA (Apr 2024)	Seeds are NOT on the FTL. Sprouter is both grower and initial packer — TLC assigned at Initial Packing CTE by the sprouter (TLC Source). Sprouter must also maintain certain KDEs related to seed growing, conditioning, packing, and supplying.
<b>Ex. 6</b>	<b>Aquacultured Tilapia, Canned Tomatoes, Eggs, Imported Mangoes</b> Source: FDA FSMA (Jun 2023)	Multiple scenarios: (A) Tilapia processor uses Initial Packing KDEs (not Transformation) when transforming unpackaged RAC. (B) Canned tomatoes — Receiving KDEs required, but no Shipping KDEs after canning. Written agreements can exempt KDEs. (C) Importer holding food = covered; broker not holding = not covered. (D) Shell eggs: inline, offline, and commingled egg exemptions.
<b>Ex. 7</b>	<b>Peanut Butter Crackers, Fresh-Cut Apples, Food Hubs, Dual Jurisdiction</b> Source: FDA FSMA (Mar 2025)	Peanut butter crackers: nut butter processor + cracker manufacturer both have KDE obligations. Fresh-cut apples: whole apples not FTL, but fresh-cut IS FTL — Transformation CTE triggered at processing. Food hubs: aggregator is the TLC Source for melons from multiple farms. Dual jurisdiction: shared receiving room triggers Receiving KDEs even if some production lines are USDA-exempt.

### ■ How These Examples Guide Your Compliance Strategy

Each FDA example identifies exactly which entities are covered and which KDEs they must maintain.

Use the Compliance Checklist in Section 10 to map these examples to your specific supply chain role.

Commport's compliance team can review your supply chain and configure EDI + GDSN workflows for each scenario.

Contact us: [www.commport.com/contact-us/](http://www.commport.com/contact-us/)

## 6 How Commport EDI Solutions Enable FSMA Compliance

Commport Communications has been a trusted EDI provider to the North American food industry for over **40 years**. Our EDI platform automates the capture and exchange of traceability data — including Traceability Lot Codes and all required KDEs — between supply chain partners, making 24-hour FDA compliance achievable at scale.

### Three EDI Delivery Models — All Supporting FSMA Traceability

EDI Solution	How It Supports FSMA Traceability
<b>Commport Integrated EDI</b>	ERP-connected EDI. Traceability KDEs flow directly from your ERP into every outbound EDI transaction.
<b>Commport Cloud EDI</b>	Browser-based EDI for businesses without ERP. Simple interface for generating compliant EDI 856 ASN with TLC data.
<b>Commport EDI Outsourcing</b>	Fully managed EDI — Commport handles all mapping, monitoring, and compliance on your behalf.
<b>Commport VAN</b>	Secure Value Added Network for EDI message delivery between you and all your trading partners.
<b>Commport Doc2EDI</b>	Converts paper/PDF documents into compliant EDI transactions — ideal for suppliers new to EDI.

### How EDI Automates FSMA Compliance

- **Automates CTE data capture at every supply chain touchpoint** Eliminates manual data entry at Growing, Receiving, Shipping, and Transformation events
- **Encodes TLC and TLC Source into every outbound transaction** EDI 856 ASN carries TLC, GTIN, quantity, ship date, and origin/destination GLNs
- **Creates structured, auditable KDE records** Satisfies all FDA-approved KDE linking methods — searchable and retrievable within seconds
- **Enables 24-hour FDA data response** All KDE records instantly accessible through Commport's platform — no manual compilation needed
- **Supports ERP integration** Connects with SAP, NetSuite, Microsoft, Sage, Acumatica, and all major ERP systems
- **Covers all trading partners** Commport's network connects to 5,000+ trading partners — retailers, distributors, wholesalers, and more

## Ready to Automate Your FSMA EDI Compliance?

Commport EDI Solutions | Integrated, Cloud, and Managed EDI for Food Traceability

[www.commport.com/commport-services/commport-edi-solutions/](http://www.commport.com/commport-services/commport-edi-solutions/)

## 7 How Commport GDSN Synchronizes the Product Data

The **Global Data Synchronization Network (GDSN)** is the GS1-certified network for sharing accurate, consistent product data between trading partners. For FSMA compliance, GDSN is the foundation of your TLC implementation — ensuring that the GTIN-linked product data referenced in every traceability record is accurate and synchronized across all supply chain systems.

### Commport GDSN & Datapool Solutions

GDSN Solution	How It Supports FSMA Traceability
<b>Commport GDSN (Datapool)</b>	GS1-certified datapool for publishing and synchronizing GTIN-linked product data with all trading partners.
<b>Commport PIM</b>	Product Information Management — centralize, enrich, and manage all product attributes for FSMA and retail compliance.
<b>Commport Product Syndication (CPS)</b>	Distribute product data to any channel or trading partner system — beyond the GDSN network.

### How GDSN Supports FSMA Food Traceability

- **Establishes the authoritative GTIN for every FTL food item** The GTIN is the foundation of every compliant TLC implementation
- **Synchronizes product data across all trading partner systems** Ensures TLC references link to verified, consistent product identity
- **Maintains commodity descriptions, country of origin, harvest date** KDEs required at Growing, Initial Packing, and Receiving CTEs
- **Reduces data entry errors and discrepancies** Synchronized GDSN data reduces deductions, returns, and compliance penalties
- **Enables rapid product identification during recalls** GTIN-linked lot data supports targeted, fast recall scoping
- **Supports GS1 GLN for TLC Source references** Globally unique location identifiers for farms, packing houses, and facilities

## Synchronize Your Product Data for FSMA Compliance

Commport GDSN Datapool | GS1-Certified | North American Food Industry Leader

[www.commport.com/commport-services/commport-gdsn/](http://www.commport.com/commport-services/commport-gdsn/)

## 8 Key EDI Transactions for Food Traceability

Commport supports all EDI transaction sets required to automate FSMA Food Traceability compliance. The table below maps each transaction to its CTE and shows what traceability data it captures.

EDI Transaction	CTE Supported	FSMA Traceability Data Captured
<b>EDI 856 — Advance Ship Notice (ASN)</b>	Shipping CTE	TLC, TLC Source, GTIN, quantity shipped, ship date, shipper GLN, buyer GLN, carrier details, origin & destination. PRIMARY compliance vehicle.
<b>EDI 214 — Transportation Status</b>	Shipping / Receiving	Carrier tracking, location updates, delivery confirmation — linking TLC to physical movement.
<b>EDI 810 — Invoice</b>	Shipping / Receiving	Product identifiers (GTIN), quantities, lot references, buyer/seller GLNs — financial audit trail linked to traceability events.
<b>EDI 850 — Purchase Order</b>	Receiving / Creating	Product specification (GTIN), quantity, delivery date — initiates traceability chain for ordered FTL foods.
<b>EDI 855 — PO Acknowledgment</b>	Receiving / Creating	Confirms product details, lot designations, delivery commitments.
<b>EDI 830 — Planning Schedule</b>	Growing / Initial Packing	Forecasted production schedules linked to FTL commodities and anticipated lot volumes.
<b>EDI 940 — Warehouse Shipping Order</b>	Shipping CTE	Warehouse-level shipping instructions including TLC and product details.
<b>EDI 944 — Warehouse Receipt</b>	Receiving / Transforming	Records of stock received at warehouse, linked to TLC and KDE data for each lot.
<b>EDI 753 — Request for Routing</b>	Shipping CTE	Links logistics routing to specific TLC lots — supporting chain-of-custody documentation.
<b>EDI 997/999 — Functional Acknowledgment</b>	All CTEs	Confirms receipt and acceptance of traceability EDI transactions — audit trail of data exchange.

**Reference:** [commport.com/edi-ansi-x12-transactions-list/](https://commport.com/edi-ansi-x12-transactions-list/) | [commport.com/un-edifact/](https://commport.com/un-edifact/)

## 9 GDSN Product Attributes for FSMA Traceability

Commport's GS1-certified GDSN Datapool maintains the following product attributes — all referenced in FSMA traceability records and synchronized with your trading partners.

Product Attribute / KDE	FSMA Traceability Relevance
<b>Global Trade Item Number (GTIN)</b>	Primary product identifier linking TLC records to specific products across all trading partners.
<b>Global Location Number (GLN)</b>	Identifies TLC Source physical locations (farms, packing houses, facilities).
<b>Item Description / Commodity</b>	Commodity description required as a KDE at every CTE.
<b>Country / Region of Origin</b>	KDE at Growing and Initial Packing CTEs — geographic traceability to source.
<b>Harvest / Pack Date</b>	Date-based KDE at Growing and Initial Packing CTEs — lot-level traceability.
<b>Unit of Measure / Pack Size</b>	Quantity and pack configuration required as KDEs at all Shipping/Receiving CTEs.
<b>Allergen Information</b>	Required for RTE foods — links to Creating and Transforming CTE records.
<b>Net Weight / Net Content</b>	Quantity KDE for Shipping and Receiving CTEs.
<b>Product Form (Fresh vs. Frozen)</b>	Determines FTL applicability — fresh triggers traceability; frozen/shelf-stable may be exempt.
<b>Brand / Trade Name</b>	Supports product identification in distribution and retail systems linked to TLC records.
<b>Packaging Type / Format</b>	Supports unit-level and case-level tracking via SSCC barcode labels.
<b>Regulated Product Indicators</b>	Flags products as FTL-regulated — enables automated compliance screening.

**Reference:** [commport.com/what-is-a-gtin/](http://commport.com/what-is-a-gtin/) | [commport.com/what-is-a-gln/](http://commport.com/what-is-a-gln/) | [commport.com/gs1-gdsn-network/](http://commport.com/gs1-gdsn-network/)

## 10 FSMA Food Traceability Compliance Checklist

### ■ Enforcement Date: July 20, 2028

Use this checklist to assess your compliance readiness and identify gaps. Each checkbox represents a mandatory requirement under 21 CFR Part 1, Subpart S. Commport can help you implement every item on this list through our EDI and GDSN solutions.

### STEP 1: Determine If You Are Covered

- **Identify all foods you handle that are on the Food Traceability List (FTL)**  
Review Section 2 of this guide for the complete FTL category list
- **Determine if any of your products contain FTL ingredients in the same listed form**  
e.g., a sandwich containing fresh tomatoes or leafy greens
- **Assess your specific supply chain role(s)**  
Grower, packer, cooler, first land-based receiver, processor, distributor, importer, retailer, or multiple
- **Identify all business locations that handle FTL foods**  
Each physical location may need a Global Location Number (GLN) as TLC Source
- **Check if any exemptions apply to your operation**  
Very small business, farm sales thresholds, commingling exemptions, USDA dual-jurisdiction exemptions
- **Determine if written agreements with trading partners are in place (or needed)**  
21 CFR 1.1305(d)(6) written agreements can exempt KDEs when food will be transformed to non-FTL form

### STEP 2: Develop Your Written Traceability Plan









- **Create a written Traceability Plan describing your recordkeeping systems and practices**  
Required for ALL entities covered by the rule — must be available to FDA upon request
- **Identify the point(s) in your supply chain where TLCs are assigned**  
Initial packing, first land-based receiver, or transformation — based on your role
- **Document how your business links KDEs to TLCs**  
Database records, electronic spreadsheets, EDI transactions, or commercial documents
- **Identify all Critical Tracking Events (CTEs) that apply to your operation**  
Growing, Cooling, Initial Packing, First Land-Based Receiver, Receiving, Transforming, Creating, Shipping
- **Document your food handling procedures and supply chain partners**  
Previous sources and subsequent recipients for all FTL foods

- **Establish a process for updating your Traceability Plan**  
Plan must be kept current as your operations and supply chain evolve








### STEP 3: Implement Traceability Lot Code (TLC) Assignment


- **Obtain a GS1 Company Prefix to enable GTIN assignment**  
Required for globally unique product identification — apply at [gs1.org](https://gs1.org)
- **Assign GTINs to all FTL food products you manufacture or pack**  
The GTIN is the product identifier referenced in all TLC records
- **Assign GLNs to all physical locations that are TLC Sources**  
Farms, packing houses, processing facilities — each needs a unique GLN
- **Establish your TLC format combining GTIN + lot code + date code**  
Industry best practice per GS1 traceability guidelines
- **Print GS1-128 barcode labels on all cases and pallets of FTL foods**  
Encodes TLC, GTIN, quantity, and date on physical packaging
- **Implement SSCC (Serial Shipping Container Code) on all pallets**  
Enables pallet-level tracking through the supply chain
- **Publish all FTL product GTINs and location GLNs in Commport GDSN Datapool**  
Synchronizes your product identity data with all trading partners

## STEP 4: Build Systems to Capture KDEs at Each CTE







- 
**Configure EDI 856 ASN to include TLC, TLC Source, GTIN, quantity, and ship date**  
 Satisfies all Shipping CTE KDE requirements in a single automated transaction
- 
**Configure receiving systems to capture TLC, TLC Source, quantity, and source location**  
 Satisfies Receiving CTE KDE requirements when FTL foods arrive
- 
**Implement Transformation CTE records for all processing operations**  
 Assigns new TLC; captures input food TLCs, location, date, and output product GTIN
- 
**Implement Creating CTE records for all RTE/manufactured FTL foods**  
 Captures input FTL ingredient TLCs, location, product description, date, and quantity
- 
**Implement Growing and Cooling CTE records (produce growers/coolers)**  
 Location description, commodity, variety, harvest/cool date, and quantity
- 
**Implement First Land-Based Receiver CTE records (seafood importers/receivers)**  
 TLC assignment, species, vessel name, quantity, date/location of receipt
- 
**Verify KDEs are being passed to downstream trading partners with every shipment**  
 Shipping CTE KDEs must be communicated to the immediate subsequent recipient
- 
**Establish a process to receive and store KDEs from upstream trading partners**  
 Receiving CTE requires KDEs from the immediate previous source

## STEP 5: Implement EDI & Technology Infrastructure







- 
**Assess your current EDI setup for FSMA traceability KDE support**  
 Contact Commport for a free EDI compliance gap assessment
- 
**Update EDI 856 ASN mappings to include TLC and TLC Source data elements**  
 Commport's EDI mapping team can implement FSMA-compliant ASN updates
- 
**Implement EDI with all key trading partners (retailers, distributors, suppliers)**  
 All Shipping CTE KDEs must be transmitted electronically for scalable compliance
- 
**Connect EDI to your ERP or WMS system for automated data flow**  
 Commport Integrated EDI supports SAP, NetSuite, Microsoft, Sage, Acumatica, and more
- 
**Implement GDSN synchronization for all FTL food GTINs**  
 Commport GDSN Datapool publishes your product data to all trading partners
- 
**Establish a searchable, retrievable KDE record database**  
 Must be able to pull all KDEs for any TLC within 24 hours of an FDA request
- 
**Test 24-hour FDA data retrieval capability**  
 Simulate an FDA data request — can you produce all KDEs for a specific TLC in under 24 hours?

- 
**Implement EDI Functional Acknowledgments (997/999) for audit trail**  
 Confirms successful receipt of every traceability EDI transaction

## STEP 6: Trading Partner & Supply Chain Readiness

- 
**Notify all FTL food trading partners of your traceability requirements**  
 Upstream suppliers must provide KDEs; downstream partners must accept them
- 
**Confirm that your suppliers are passing TLC and KDEs with every shipment**  
 Receiving CTE compliance depends on upstream supplier KDE transmission
- 
**Audit trading partner EDI 856 ASN for TLC and KDE completeness**  
 Commport can analyze incoming ASNs and identify missing traceability data
- 
**Establish written agreements where applicable for exemption eligibility**  
 21 CFR 1.1305(d)(6) and 1.1305(h) exemptions require written agreements in place
- 
**Review retailer and distributor FSMA mandates**  
 Many major retailers are already requiring FSMA-compliant traceability data from suppliers
- 
**Confirm GDSN product data is synchronized with all key trading partners**  
 Commport GDSN ensures your GTIN-linked KDE data is trusted and consistent across partners

## STEP 7: Records Retention, Response Readiness & Ongoing Compliance

- 
**Establish a 2-year minimum records retention policy for all traceability records**  
 FDA requires records to be maintained for at least 2 years (or 1 year for some seafood)
- 
**Train all relevant staff on FSMA traceability requirements and procedures**  
 Include staff in receiving, shipping, production, quality assurance, and IT
- 
**Conduct internal mock FDA traceability request drills**  
 Simulate a 24-hour FDA data request to identify and address any gaps
- 
**Establish a recall response procedure using TLC-based lot targeting**  
 Lot-level TLC traceability enables targeted recalls — limiting scope and cost
- 
**Schedule annual review and update of your Traceability Plan**  
 Keep your plan current as your product portfolio, partners, and operations evolve
- 
**Monitor FDA guidance updates for the Food Traceability Rule**  
 FDA continues to publish new supply chain examples and Q&A; guidance at [fda.gov/fsma](https://www.fda.gov/fsma)

**Need Help Completing Your Compliance Checklist?**

Commport's FSMA compliance specialists will review your checklist results, identify your gaps,  
and build a step-by-step EDI + GDSN implementation roadmap for your business.

[www.commport.com/contact-us/](http://www.commport.com/contact-us/) | [sales@commport.com](mailto:sales@commport.com) | +1-800-565-2666

## 11 Benefits of Getting Compliant Early

- 
**Faster, More Targeted Recalls**  
 Lot-level TLC traceability reduces recall investigation from days to hours. Targeted recalls limit scope to specific affected lots — avoiding massive wide-scale recall costs and minimizing consumer harm.
  
- 
**Meet the 24-Hour FDA Response Requirement**  
 Automated, structured EDI records make all KDE data instantly accessible — satisfying the FDA's most demanding compliance requirement without manual data compilation.
  
- 
**Protect Trading Partner Relationships**  
 Major retailers including Loblaws, Sobeyes, Metro, Walmart, and Costco are already requiring FSMA-compliant traceability data from suppliers. Early compliance protects your shelf space.
  
- 
**Reduce Operational Costs Through Automation**  
 EDI and GDSN automation eliminates manual data entry, reduces invoice discrepancies, and streamlines receiving and shipping operations — delivering measurable, ongoing ROI.
  
- 
**Improve Product Data Quality**  
 GDSN synchronization ensures product data is accurate and trusted across all trading partner systems — reducing deductions, returns, and compliance penalties from data errors.
  
- 
**Gain Real-Time Supply Chain Visibility**  
 Know exactly where every FTL food lot is at every step — from growing location to retail shelf — with live traceability data flowing through your EDI network.
  
- 
**Build a Competitive Advantage**  
 Early FSMA compliance differentiates your business as a trusted, food-safety-forward supplier — a powerful advantage in a competitive food market where safety reputation drives purchasing decisions.
  
- 
**Future-Proof Your Infrastructure**  
 Commport's standards-based EDI and GDSN platform supports FSMA compliance today and is built to adapt to future FDA, retail, and global regulatory requirements.

## 12 Frequently Asked Questions

### Q: What is the FSMA Food Traceability Final Rule?

A: The FSMA Food Traceability Final Rule (21 CFR Part 1, Subpart S) requires businesses that manufacture, process, pack, or hold foods on the Food Traceability List (FTL) to maintain Key Data Element (KDE) records at each Critical Tracking Event (CTE) and provide that data to the FDA within 24 hours upon request. Compliance is enforced from July 20, 2028.

### Q: What is the compliance date and has it changed?

A: The current enforcement date is July 20, 2028. The original date was January 20, 2026. The Continuing Appropriations Act of 2026 directed FDA not to enforce the rule prior to July 20, 2028. FDA intends to comply. Do not wait — building compliant infrastructure takes months.

### Q: What is a Traceability Lot Code (TLC) and how is it different from a regular lot number?

A: A TLC is an alphanumeric identifier that uniquely identifies a traceability lot within the records of the TLC Source (the assigning entity). It functions like a traditional lot number but must be consistently maintained throughout the supply chain and linked to a specific TLC Source. GS1-based TLCs (GTIN + lot code + date code) are industry best practice.

### Q: What are Critical Tracking Events (CTEs)?

A: CTEs are the 8 specific supply chain points where traceability records must be captured: Growing, Cooling, Initial Packing, First Land-Based Receiver (seafood), Receiving, Transforming, Creating, and Shipping. Each CTE has specific Key Data Elements (KDEs) that must be recorded and linked to the Traceability Lot Code.

### Q: How does EDI help with FSMA compliance?

A: EDI automates the exchange of traceability KDE data between supply chain partners in a structured, standardized format. The EDI 856 Advance Ship Notice (ASN) is the primary compliance vehicle — it carries the TLC, TLC Source, GTIN, quantity, and all Shipping CTE KDEs in a single electronic transaction. Commport's EDI platform is configurable for full FSMA KDE compliance.

### Q: What role does GDSN play in food traceability compliance?

A: GDSN ensures that the product data referenced in traceability records — GTINs, commodity descriptions, country of origin, allergens, net weight — is accurate and synchronized across all trading partner systems. Commport's GS1-certified GDSN Datapool is the foundational layer for any compliant TLC implementation.

### Q: What happens if my business does not comply?

A: Non-compliance can result in FDA warning letters, injunctions, import alerts, and in egregious cases, criminal prosecution. Beyond regulatory penalties, non-compliant suppliers risk losing trading partner access — major retailers are already de-listing suppliers that cannot provide FSMA-compliant traceability data.

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**Q: How long does Commport take to implement FSMA-compliant EDI and GDSN?**

A: For businesses with existing EDI, adding FSMA traceability KDEs to EDI 856 ASN typically takes 4 to 8 weeks. For businesses new to EDI or GDSN, full implementation takes 3 to 6 months. Commport provides dedicated onboarding, trading partner mapping, and compliance testing throughout.

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## 13 Get Started with Commport — Your FSMA Compliance Partner

Commport Communications has been a trusted North American leader in EDI and GDSN solutions for the food, grocery, retail, and consumer goods industries for over **40 years**. Our purpose-built platform delivers the data exchange infrastructure food companies need to capture, transmit, and maintain the Key Data Elements required under the FSMA Food Traceability Final Rule — in a compliant, automated, and scalable way.

What Commport Offers	How It Helps Your FSMA Compliance
<b>Free FSMA Compliance Assessment</b>	We review your current EDI and GDSN setup, identify gaps, and build a compliance roadmap
<b>EDI Implementation &amp; Mapping</b>	Configure all EDI transactions (856 ASN, 850, 810, etc.) to capture and transmit FSMA KDEs
<b>GDSN Datapool Onboarding</b>	Register, enrich, and publish all FTL food GTINs and GLNs to the GS1 GDSN Network
<b>Trading Partner Onboarding</b>	Connect with retailers, distributors, and suppliers — 5,000+ trading partners in network
<b>ERP / WMS Integration</b>	Integrate EDI and GDSN with your SAP, NetSuite, Microsoft, Sage, Acumatica, or other systems
<b>Ongoing Managed Services</b>	Commport EDI Outsourcing handles all compliance monitoring, updates, and partner management
<b>Compliance Training &amp; Support</b>	Train your team on FSMA requirements and Commport platform usage — dedicated support team

## Request Your Free FSMA Compliance Assessment Today

Our FSMA compliance specialists are ready to help you build a roadmap to full compliance.

**Enforcement Date: July 20, 2028 — Start Now**

[www.commport.com/contact-us/](http://www.commport.com/contact-us/)

[sales@commport.com](mailto:sales@commport.com) | +1-800-565-2666

EDI Solutions	GDSN Solutions	Resources
<b>Commport Integrated EDI</b> <a href="http://commport.com/commport-services/commport-integrated-edi/">commport.com/commport-services/commport-integrated-edi/</a>	<b>Commport GDSN Datapool</b> <a href="http://commport.com/commport-services/commport-gdsn/">commport.com/commport-services/commport-gdsn/</a>	<b>EDI X12 Transaction List</b> <a href="http://commport.com/edi-ansi-x12-transactions-list/">commport.com/edi-ansi-x12-transactions-list/</a>
<b>Commport Cloud EDI</b> <a href="http://commport.com/commport-services/commport-cloud-edi/">commport.com/commport-services/commport-cloud-edi/</a>	<b>Commport PIM</b> <a href="http://commport.com/commport-services/commport-pim/">commport.com/commport-services/commport-pim/</a>	<b>What Is a GTIN</b> <a href="http://commport.com/what-is-a-gtin/">commport.com/what-is-a-gtin/</a>
<b>Commport EDI Outsourcing</b> <a href="http://commport.com/commport-services/commport-edi-outsourcing/">commport.com/commport-services/commport-edi-outsourcing/</a>	<b>Commport Product Syndication</b> <a href="http://commport.com/commport-services/commport-product-syndication/">commport.com/commport-services/commport-product-syndication/</a>	<b>What Is a GLN</b> <a href="http://commport.com/what-is-a-gln/">commport.com/what-is-a-gln/</a>
<b>Commport VAN</b> <a href="http://commport.com/commport-services/commport-value-added-network/">commport.com/commport-services/commport-value-added-network/</a>	<b>GDSN Benefits</b> <a href="http://commport.com/gdsn-benefits/">commport.com/gdsn-benefits/</a>	<b>SSCC Barcode Label</b> <a href="http://commport.com/what-is-the-sscc-barcode-label/">commport.com/what-is-the-sscc-barcode-label/</a>

**About Commport Communications:** Commport is a North American leader in EDI, GDSN, and supply chain data solutions, serving the food, grocery, retail, healthcare, and consumer goods industries for over 40 years. Our GS1-certified GDSN Datapool and full-service EDI platform help businesses automate supply chain data exchange, achieve regulatory compliance, and build stronger trading partner relationships. | [www.commport.com](http://www.commport.com)

## Your Next Steps After Downloading This Guide

You have taken the first step toward FSMA Food Traceability compliance by downloading this guide. Use the action checklist below to make immediate progress. Complete each step in order to build your compliance foundation before the **July 20, 2028** enforcement date.

### This Week: Confirm Your Coverage

- **Review the Food Traceability List in Section 2 of this guide against your product portfolio**  
 Flag every SKU that falls under an FTL category
- **Identify your supply chain role(s)**  
 Grower, packer, processor, distributor, importer, retailer or multiple roles
- **List all physical locations that handle FTL foods**  
 Each site may need a GLN assigned as a TLC Source
- **Email this guide to your supply chain, IT, and compliance teams**  
 FSMA compliance is a cross-functional initiative

### This Month: Assess Your Current Systems

- **Audit your current EDI setup**  
 Can your EDI 856 ASN carry a Traceability Lot Code and TLC Source today?
- **Audit your current product data**  
 Do all your FTL food SKUs have GTINs registered in a GS1-certified GDSN datapool?
- **Review your lot code system**  
 Is it structured around GTIN plus date code per GS1 best practice?
- **Contact Commport for a free FSMA compliance gap assessment**  
 We will identify exactly what needs to change in your EDI and GDSN setup

### Next 90 Days: Build Your Compliance Infrastructure

- **Develop your written Traceability Plan**  
 Required for all covered entities under 21 CFR Part 1, Subpart S
- **Work with Commport to update EDI transaction mappings**  
 Add TLC and TLC Source data elements to your EDI 856 ASN and other transactions

- **Onboard to Commport GDSN Datapool**  
Publish all FTL food GTINs and location GLNs to the GS1 network

- **Notify your supply chain partners of your new traceability requirements**  
Upstream suppliers must pass KDEs; downstream partners must accept them

### Ongoing: Maintain and Test

- **Conduct a 24-hour FDA response drill every 6 months**  
Simulate pulling all KDEs for a specific TLC within the required window
- **Review and update your Traceability Plan annually**  
Keep it current as your products, partners, and processes evolve
- **Monitor FDA guidance updates at [fda.gov/fsma](https://www.fda.gov/fsma)**  
FDA continues publishing new supply chain examples and Q&A; guidance
- **Schedule an annual EDI and GDSN compliance review with Commport**  
We will ensure your setup stays current with regulatory and trading partner requirements

## Ready to Take the Next Step?

Contact Commport today for your free FSMA Compliance Assessment.





We will review your systems, identify your gaps, and build your compliance roadmap.

[www.commport.com/contact-us/](https://www.commport.com/contact-us/)



## Get In Touch With Commport

We are here to help you navigate FSMA Food Traceability compliance and build the right EDI and GDSN infrastructure for your business. Reach out to our team today.

<p> <b>Email Us</b></p> <p>General Inquiries:</p> <p><a href="mailto:sales@commport.com">sales@commport.com</a></p>		<p> <b>Call Us</b></p> <p>Toll Free (North America):</p> <p>+1-800-565-2666</p>	
<p> <b>Visit Our Website</b></p> <p>Main Website:</p> <p><a href="http://www.commport.com">www.commport.com</a></p>		<p> <b>Our Office</b></p> <p>Commport Communications Inc.</p> <p>4 Robert Speck Pkwy, Suite 1500</p> <p>Mississauga, ON L4Z 1S1</p>	
<p><b>LinkedIn</b> <a href="https://www.linkedin.com/company/commport-communications">linkedin.com/company/commport-communications</a></p>	<p><b>Twitter / X</b> <a href="https://twitter.com/commportcomm">@commportcomm</a></p>	<p><b>Support Portal</b> <a href="https://commport.com/commport-support/">commport.com/commport-support/</a></p>	<p><b>Network Status</b> <a href="https://commport.com/commport-network-status-page/">commport.com/commport-network-status-page/</a></p>

## Our Solutions

<b>EDI Solutions</b> Integrated EDI, Cloud EDI, EDI Outsourcing, VAN, Doc2EDI	<b>GDSN Solutions</b> GDSN Datapool, PIM, Product Syndication	<b>Industry Focus</b> Food and Beverage, Retail, Healthcare, Manufacturing	<b>Partnerships</b> Trading Partner Network, ERP Partnership Program
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