



How to get started with FSMA compliance?



10 things to consider

1. The time to start planning is now

- FSMA 204 Compliance starts January 2026, set a time frame to implement processes

2. You know it's happening - Designate a team or individual within your organization to lead the FSMA compliance efforts and create a Traceability Plan

- Provide training on FSMA requirements, food safety principles, and any specific procedures or protocols necessary for compliance
- Use resources such as FDA webinars and presentations, IDDBA webinars, and IDDBA Safe Food Matters page

3. Check out the FSMA 204 regulations on the FDA's website (www.fda.com) for valuable insights

- Evaluate current food safety practices and procedures against FSMA requirements – are there areas where your company may fall short of compliance?
- Develop a plan internally and with suppliers
- Document all food safety procedures, processes, and controls to ensure consistency and compliance with FSMA regulations

4. Review the Food Traceability List (FTL)

- Identify foods your company manufactures, processes, packs, or holds that made the list
- Document processes to identify and manage FTL items

5. Implement Preventive Control

- Implement preventive controls to identify and address potential hazards in food production, processing, and distribution processes.

6. Have a recall plan

- No specific format is mandated but the plan must meet the requirements of the rule and align with the current practices of the covered entity

7. Supplier Verification

- Implement a program for verifying the safety of ingredients and raw materials obtained from suppliers, as required by the FSVP rule
- Develop a plan to obtain FTL data from your shippers
- Talk to your partners; are they FSMA-ready?
- How will your supplier share shipping KDEs with you?

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10 things to consider (cont'd)

8. Technology and operations analysis

- Evaluate how FTL items are currently managed in your facilities
- What are your customers' requirements for receiving your shipping KDEs (key data elements)
- How will you collect, manage, and share CTEs and KTEs?
- Consider that FSMA traceability, including recording and sharing Critical Tracking Events (CTEs) and Key Data Elements (KDEs), is attainable with currently available digital supply chain technology

9. Establish Recordkeeping Systems

- Establish systems for recordkeeping and documentation to track compliance with FSMA requirements, including monitoring, corrective actions, and verification activities.
- KDE and CTE information must be captured, stored and maintained for 24 months
- Be able to produce records and sortable spreadsheets within 24 hours of the FDA's request
- Audit your program; include facilities and suppliers and review routinely to determine level of compliance

10. Stay Informed

- Stay up-to-date on any changes or updates to FSMA regulations and guidance documents issued by the Food and Drug Administration (FDA) to ensure ongoing compliance. The food traceability list may grow in the future.

