

Key Milestones for FSMA 204 Readiness



Less than
2 YEARS REMAIN

▶ Start now.
Build capability one milestone at a time.

For suppliers shipping FTL foods or preparing to meet FSMA 204 requirements across all products.

	2025 - H1 2026	2026		2027				2028	
	2025 - H1 2026	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2
 Build the Foundation 2025-early 2026 Should have already been completed. • Select a traceability solution provider • Confirm accuracy of master data • Determine how you will share data with customers • Share test shipment records and labels with customers • Align labels with industry standards and customer requirements	 Most foundational work should be complete.								
 Test & Connect H2 2026 Start small to build operational confidence. • Create your traceability plan • Connect business systems to your traceability system • Share production shipping records with select customers, then scale up.		 Identify gaps through testing.							
 Scale Across Operations 2027 Scale your traceability processes across facilities, products, and customers. • Capture all internal CTEs in your traceability system - verify data is complete and accurate. • Conduct mock traces (backward and forwards) – identify and address gaps • Confirm you can quickly generate an FDA-compliant electronic sortable spreadsheet • Refine your traceability plan • Operationalize your plan with SOPs, staff training, KPIs, and quality reviews				 2027 - close gaps and scale.					
 Validate & Finalize H1 2028 Validate readiness and resolve remaining gaps. • Confirm all facilities are sharing production data with customers for all applicable products.		 TODAY						 Validate readiness before enforcement.	