

A Traceability Plan is required for those subject to the Food Traceability Rule

How to Build Your FSMA 204 Traceability Plan

What to include, what to consider, and how to get started.

YOUR TRACEABILITY PLAN MUST INCLUDE:

- ✓ **Recordkeeping procedures** — How, where, and in what format required records are maintained
- ✓ **FTL identification procedures** — How you identify applicable foods
- ✓ **Traceability Lot Code procedures** — How TLCs are assigned, if applicable
- ✓ **Point of contact** — Who can answer questions about your plan and records
- ✓ **Farm map** — Required for applicable growers and aquaculture operations

Update your plan as needed to reflect current practices and retain previous versions for two years after each update.

HOW TO BUILD IT

1 Map How You Maintain Traceability Records

Document how required records are created, maintained, stored, and accessed.

WHO creates and manages them?

WHERE and in what format are they created and stored?

HOW can they be accessed when needed?

2 Document How You Identify FTL Foods

Define how your organization determines which foods you manufacture, process, pack, or hold are on the Food Traceability List (FTL).



Consider how FTL status is identified, maintained, and communicated across your supply chain.

3 Define Your Traceability Lot Code Process

If applicable, document when and how Traceability Lot Codes (TLCs) are assigned—and how you ensure the correct code stays connected to the correct product.

WHEN are TLCs assigned?

HOW are they generated?

HOW do you verify accuracy?

Product → TLC → Label / Data Record

4 Assign Ownership

Identify the point of contact responsible for questions about your traceability plan and records. Clarify supporting roles across your organization.



5 Add Farm Maps, If Applicable

For growers or raisers of FTL foods other than eggs, document the required growing areas—or aquaculture containers—including identifying information and geographic coordinates. *See example below.*

YOUR PLAN ISN'T ONE-AND-DONE

Review → Test → Update → Retain

FDA's rule requires the plan to be updated as needed to reflect current practices, and previous versions of your plan must be retained for two years after an update.



REMEMBER: Your traceability plan should document how traceability actually works across your operation.

See What a Traceability Plan Can Look Like

SAMPLE TRACEABILITY PLAN

Greenfield Organics



Section	Example
Procedure for Maintaining Records	Required Key Data Elements (KDEs) are captured from our business systems and operational processes and maintained in iFoodDS Trace Exchange. Our traceability team monitors records for completeness and accuracy. Traceability data is stored in Trace Exchange, where authorized users can access records and share required data with trading partners.
Procedure for Identifying FTL Foods	All products packed at this facility are on the FTL. Confirmed by verifying against the Food Traceability List on FDA's website.
Procedure for Assigning Traceability Lot Codes	Each product/pack size is assigned a 14-digit GS1 GTIN. Internal lot codes are assigned using date (MMDDYY) and packing line ("AAA" - "ZZZ"). Together, the GTIN and internal lot code make up our Traceability Lot Code.
Point of Contact	- Jane Doe, Traceability and Compliance Manager - Phone: 123-456-7890, Email: jdoe@greenfieldorganics.com
Traceability Plan Updates and Previous Versions	- This Traceability Plan is reviewed every 6 months as part of our field and facility system review. We also review this Traceability Plan whenever changes are made to our traceability procedures. - Previous versions are stored in our organization's SharePoint folder for field and facility procedures for at least 2 years after each update.

Farm Map



Field Name	Field Geographic Coordinates
A-1	36.74461554525644,-121.57780927793655
B-1	36.73652912775524,-121.57222320778244
B-2	36.72844185835293,-121.55132049365741
B-3	36.724831195197915,-121.53636424130934
B-4	36.721798106955355,-121.53095836696664
C-1	36.71414263734224,-121.5433918779548
C-2	36.71472043525028,-121.53005738790955
C-3	36.70590854500752,-121.53546326225222
D-1	36.691027158050076,-121.51474074393863
D-2	36.68784823601919,-121.50284782038473
E-1	36.67831068146508,-121.5098754570302

 **REMEMBER:** Your traceability plan should describe your actual processes. Use this example as a starting point—not a fill-in-the-blank compliance document.