

A graphic of a barcode with vertical bars of varying heights, rendered in black on a red background.

IFDA MANUAL

**FSMA Final Rule on
Requirements for
Additional Traceability
Records for Certain Foods**

**Foodservice Distributor
Customer Expectations**



Food Traceability Rule – Foodservice Distributor Customer Expectations

The US Food and Drug Administration's (FDA's) [Final Rule on Requirements for Additional Traceability Records for Certain Foods](#) will take effect on **January 20, 2026**. The rule requires entities to maintain records containing specific “key data elements” (KDEs) when they engage in “critical tracking events” (CTEs) regarding foods listed on FDA's [Food Traceability List](#) (FTL) or foods that contain FTL foods as ingredients (collectively, FTL foods). Entities engaging in certain activities at specified points in the supply chain will be required to assign a unique “traceability lot code” (TLC) to each FTL food, and subsequent entities in the supply chain will need to link KDE records to the food using the food's TLC.

If you receive FTL foods from your suppliers, you will be subject to the rule's recordkeeping requirements unless otherwise exempt. We therefore recommend that you review the rule, assess the extent to which it applies to your operations, and take all necessary steps to ensure compliance (e.g., by developing a written traceability plan). Regardless of whether you are exempt from the rule, your foodservice distributor suppliers will be required to send you the following “shipping” KDEs in order to fulfill their own compliance obligations:

- The product's TLC.
- The quantity and unit of measure.
- The product description.
- The location description for the immediate subsequent recipient, for where the food was shipped, and for the TLC source or TLC source reference.
- The date of shipment.

The following recommendations will allow you to effectively collaborate with your foodservice distributor suppliers and facilitate compliance with your regulatory obligations:

1. Be prepared to receive the above-listed shipping KDEs in the format specified by your foodservice distributor, which may include a distributor website, electronic data exchange, or invoices.
2. Notify your foodservice distributor suppliers as soon as possible (and well in advance of the January 20, 2026, compliance date) if you need to discuss any additional data delivery requirements regarding the receipt of FTL foods and/or the transmission of traceability records. Please note that it will be up to the foodservice distributor's discretion whether to accommodate requests for additional data delivery requirements that go beyond the scope of the regulations.
3. Notify your foodservice distributor suppliers as soon as possible (and well in advance of the January 20, 2026, compliance date) if you would like to negotiate an arrangement under which your foodservice distributors maintain certain records required under the rule on your behalf. Please note that it will be up to the foodservice distributor's discretion whether to accommodate requests for such arrangements.

If you are unable to comply with these best practices, or to the extent you identify other relevant compliance issues, you should contact your foodservice distributor suppliers as soon as possible. We recommend consulting with legal counsel if you have additional questions about your obligations under the rule.