



Summary of PFT-FDA Listening Session

September 25, 2026

Background: On September 25, 2026, the Partnership for Food Traceability and the FDA held a joint Listening Session for PFT members to discuss challenges and possible solutions regarding Section 204(d) of the Food Safety Modernization Act (FSMA). The FDA plans to conduct another Listening Session in November 2026 which would be open to the public, and not just PFT members.

Comments by Thomas Briant (CDA): Thomas Briant presented the FDA with the following five questions:

1. Which flexible options for tracing Food Traceability List products is the FDA currently considering?
2. Is imprinting the Traceability Lot Code, the Traceability Lot Code Source, and the expiration date on the master case label, the inner pack, and each individual package of a product under consideration by the FDA as a flexible option?
3. Does the FDA have a timeframe when it will announce which flexible options that industry members will be allowed to utilize to facilitate compliance with FSMA Section 204(d)?
4. Does the FDA have plans to further educate manufacturer and suppliers about how to comply with the provisions of FSMA Section 204(d)?
5. Does the FDA have any new information on how manufacturers and suppliers intend to share KDEs with downstream distributors?

During the question-and-answer portion of the Listening Session, the FDA stated in response to Question No. 3 that it did not have a timeframe by which the agency would announce which flexible options that industry members could utilize to comply with the food tracing requirements of FSMA Section 204(d). The FDA did not provide answers to the Questions 1, 2, 4 or 5.

Comments by John Bordewick (DOT Foods): CDA invited John Bordewick, a Senior Director of Field Sales for DOT Foods, to attend the PFT-FDA Listening Session to provide a

summary of the efforts by DOT Foods to seek responses from its food manufacturer and supplier partners regarding how these companies planned to share Key Data Elements (i.e., the Traceability Lot Code, etc.) with DOT Foods in order to be compliant with FSMA Section 204(d). In his comments, John stated the following:

- DOT Foods stocks some 5,000 food products which are regulated under FSMA Section 204(d).
- In January 2025, DOT Foods sent a letter to the food manufacturers and suppliers that the company does business with requesting that each manufacturer and supplier identify which of their products are subject to FSMA Section 204(d) and how the various Key Data Elements (i.e., name of product, traceability lot code, traceability lot code source, quantity, unit weight, expiration date, etc.) would be provided to and shared with DOT Foods for purposes of tracing the food products.
- Less than 20% of the food manufacturers and suppliers responded to the January 2025 letter sent by DOT Foods, which means that 80% of the food manufacturers and suppliers have not responded.
- DOT Foods plans to send out another round of letters this fall to its food manufacturer and supplier partners requesting the same Key Data Elements information.

In response to John Bordewick's comments, FDA Staff Member Chris Waldrop asked what role the FDA could play in assisting manufacturers comply with FSMA Section 204(d)? Tom Briant asked John Bordewick if the names and addresses of DOT Foods' manufacturers and suppliers could be provided to the FDA so the agency could send its own letter to these companies regarding compliance with FSMA Section 204(d). CDA is awaiting a response from DOT Foods regarding this request.

Comments by Charles Leftwich (Sysco): Charles Leftwich stated that Sysco has the same concern asked by Tom Briant with the need to know a timeframe for the FDA to approve various flexible options to comply with FSMA Section 204(d). Sysco has also experienced a lack of response from manufacturers and suppliers as to how they plan to comply with FSMA Section 204(d) and share Key Data Elements with distribution companies.

Comments by Mala Parker of IFDA: Mala Parker stated that the International Food Distributors Association supports a flexible option allowing the reporting of a reasonable range of traceability lot codes with the narrowest range of lot codes that is feasible to allow food traceability without case level tracking.