



AN UPDATE ON FSMA ISSUES

CDA Presents Distributor Challenges and Flexible Solutions During FDA FSMA Listening Session

On March 6, 2026, the U.S. Food and Drug Administration (FDA) held a listening session with industry trade associations to learn about challenges to comply with the food tracing requirements of Section 204(d) of the Food Safety Modernization Act (FSMA) and possible solutions to simplify compliance with tracing high-risk products at a lot-level instead of a case level.

CDA was one of the food industry trade associations that was invited to give a presentation during the FDA listening session. This presentation covered the following challenges being faced by distributors:

- Key Data Element Transmission, Capture & Retention
- Barcode Scanning
- Computer Software and Storage System Upgrades
- Standardization of Shipping Documents
- Retail Convenience Store Receiving Practices
- Distributor Food Recall Notice Procedures

The presentation also included the following five flexible solutions to minimize the burden on distributors to comply with FSMA Section 204(d):

- FDA Should Endorse or Support a Standard Barcode and Case Labeling Format
- FDA Should Recommend Uniform Data Elements in Barcodes and on Case Labels
- FDA Should Recommend Uniform Data Elements be Printed in Readable Format on Case Labels
- FDA Should Require Manufacturers to Print the Expiration Date, Lot Code, and Manufacturing Plant Location Code on Each Package of FSMA Covered Food Products to Facilitate Identification of Product Subject to a Food Recall
- FDA Should Recommend that Manufacturers Affix Pallet Barcode Labels to Each Pallet of FSMA Covered Food Products to More Readily Identify Products on a Mixed Pallet

This FDA Listening Session was conducted in coordination with the Partnership for Food Traceability (PFT), of which CDA is a member. The Listening Session was held to assist the FDA in meeting a Congressional deadline of May 9, 2026, for the agency to provide industry stakeholders with recommendations for flexible solutions to trace Food Traceability List food products on a lot-level tracking basis.

Besides the Listening Session held on March 6, 2026, the FDA will also be hosting two public town hall meetings on the FSMA Section 204(d) regulation with one such meeting scheduled for June 15, 2026, and the other scheduled for Nov. 6, 2026. Representatives from every food industry segment can attend these town hall meetings and provide comments to the FDA. Additionally, on Sept. 25, 2026, the PFT and the FDA will host another listening session for industry stakeholders that are members of PFT.

To read the CDA memo describing distributor challenges to comply with FSMA Section 204(d) and the proposed solutions to minimize the burden on distributors, [click here](#).

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