FSMA 204 Moved to 2028. Your Retail Customers' Deadlines Did Not.

The federal date slipped to 2028 but Walmart and Kroger set their own supplier deadlines, and the traceability gap most food suppliers miss sits in the lab.

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IN BRIEF

As of August 2026, the FSMA 204 retailer requirements are the binding date, not the federal one. The FDA rule now takes effect July 20, 2028, but Kroger set June 30, 2025 and Walmart and Sam's Club August 1, 2025, covering all food items rather than only the Food Traceability List.

Key takeaways

- The federal FSMA 204 date moved to July 20, 2028, but the substance of the rule did not change at all.
- Kroger, Walmart, Sam's Club, Albertsons, KeHE and Target require traceability data on all foods, not only listed foods.
- Walmart's FSMA-specific penalties are telegraphed; ASN accuracy penalties under Right Invoice are chargeable today.
- The traceability lot code is assigned at Transformation, the same moment the QC lab pulls its sample. Four seams open there.
- GFSI scheme audits already test the lab-to-plant join with a two-to-four-hour timed trace. An ASN validator never does.

Two dates matter to a food manufacturer shipping into mass retail right now. Only one of them moved.

The federal date moved. The FDA's Food Traceability Rule, Section 204 of the Food Safety Modernization Act, was scheduled to take effect January 20, 2026. It now takes effect July 20, 2028. The FDA published the proposed 30-month extension in the Federal Register in August 2025, and in November 2025 Congress directed the agency not to enforce the rule before that date through the Continuing Appropriations Act of 2026. Nothing about the substance of the rule changed. The Food Traceability List, the Critical Tracking Events, the Key Data Elements, the 24-hour records requirement, all unchanged. Only the enforcement date.

The other date did not move, because it was never the FDA's date to move. Your largest customers set it, most of them set it in 2025, and several of them set it before the original federal deadline.

DEADLINE	SET BY	SCOPE	STATUS
July 20, 2028	FDA, Food Traceability Rule	Foods on the Food Traceability List	Extended; enforcement not before this date
June 30, 2025	Kroger	All food products entering its facilities	In force
August 1, 2025	Walmart and Sam's Club	All food and beverage items: ASN and packaging	In force

What did the extension actually change for a retail supplier?

Very little, if your product ships to a national grocery or club retailer.

Kroger notified suppliers that it would collect traceability information on all food products entering its facilities by June 30, 2025, six months ahead of the original FDA date and covering far more than the Food Traceability List. Walmart and Sam's Club required suppliers of all food and beverage items to meet Advance Ship Notice (ASN) and packaging requirements as of August 1, 2025. Walmart's supplier guidance addresses the FDA extension directly and states that it expects suppliers to meet the original compliance timelines regardless.

This is not a two-retailer story. Albertsons, Sam's Club, KeHE, Kroger, Walmart and Target have all moved to require traceability data on all foods rather than only listed foods. The rule has become the floor that each buyer builds its own requirements on top of.

So the practical scope for a supplier is wider than the regulation, not narrower. If your business reasoned that only your leafy greens or your soft cheese or your ready-to-eat deli salad line was in scope, your customers disagree.

What do the retailer requirements actually consist of?

Walmart's requirements are the most widely documented and are a reasonable proxy for the pattern. Every food shipment needs:

- An ASN, transmitted as an EDI 856, carrying the Key Data Elements aligned to FSMA 204, including the lot or batch code, date codes, and the source of where that lot code was assigned
- An SSCC-18 barcode on every pallet, linked to the corresponding ASN
- A GS1-128 barcode on every case
- An item-level self-declaration in the supplier item catalog indicating whether each item is on the Food Traceability List

Walmart also supports EPCIS transmission via API as an alternative to EDI for suppliers who have built that capability.

Two structural points are worth pulling out of that list, because they shape the work. First, the lot code on the ASN has to **match** the lot code on the physical freight. Not resemble it, not map to it through a lookup someone maintains. Match. Second, every buyer implements this slightly differently, which means a supplier shipping to four national accounts is executing four versions of the same requirement.

What is the actual financial exposure today?

This is where a lot of the published commentary overstates the case, so it is worth being precise.

Walmart's supplier guidance states that monitoring and enforcement will begin with products on the Food Traceability List, and that notice will be provided to suppliers in advance of any enforcement actions specific to food traceability. That is a commitment to warn before penalizing on the traceability program itself. It is not an exemption, and it is not the whole picture.

The picture it leaves out is that FSMA 204 Key Data Elements were folded into the EDI 856, and ASN defects have been chargeable for years under the Supplier Quality Excellence Program's Right Invoice category. A malformed or late ASN generates a defect whether or not the malformation is on the traceability fields. Reported figures for that structure run to a $200 administrative fee per non-compliant purchase order plus $1 per non-compliant case, with separate charges for missing ASNs and quantity mismatches. Walmart also states that it may hold or reject freight for insufficient traceability information, and that repeat instances may prompt a review of the supplier relationship.

Traceability compliance is visible today in the SQEP dashboard and in a dedicated Food Traceability ASN dashboard. So the honest summary is this: the direct FSMA-specific penalty is telegraphed rather than active at the largest account, the indirect penalties through ASN accuracy and freight acceptance are live now, and the scorecard consequences of a poor traceability record show up in category reviews rather than on an invoice. Suppliers who wait for a line item labeled "FSMA" to appear on a deduction statement will have been paying for a year before it does.

Why is "our ERP handles traceability" true and incomplete?

Almost every article on this subject is written by an ERP, EDI, warehouse management, or third-party logistics provider, and each concludes that traceability is a shipping-data problem solved by that category of software. On the dock, that is correct. Those systems own the Shipping and Receiving events, and they are the right place to build ASN generation and label printing.

But the traceability lot code is not created on the dock. For a manufacturer or a co-packer, it is assigned at Transformation, when input lots become a new product and a new lot. That is the same moment the QC lab

pulls its sample.

From that moment forward, two systems hold records about the same lot. The ERP holds where it went. The lab holds whether it should have gone. The ASN validates the first record. Nothing in the retailer requirement, and nothing in the federal rule, validates that the second record is correctly joined to the first. Four seams open up there, and all four are lab-side.

The lot identifier fork. In many plants, the lab's sample identifier and the production lot code are different identifiers reconciled by a person, often on a bench sheet or in a spreadsheet column. That join works fine day to day. No ASN validator will ever test it, because the ASN never sees the lab record. A timed traceability exercise will test it. So will an FDA traceback. So will a customer complaint investigation that arrives eleven months after the lot shipped and the analyst who maintained the reconciliation has moved to second shift.

Release timing against ASN timing. The ASN has to transmit and pass validation before the trailer gates in at the distribution center. Disposition has to post before the truck loads. When those two clocks invert, there are two outcomes. Either the truck waits, which puts an on-time delivery penalty in play, typically 3 percent of the cost of goods on non-compliant cases. Or the load goes out ahead of its release record and the paperwork catches up afterward. The second outcome is the one that does not show up on a scorecard, because it only becomes visible later, in the records, during exactly the investigation where you least want it visible.

Trace direction. FSMA 204 and the retailer ASN both start with a lot and ask where it went. That is forward trace, and it is what the regulation was built to accelerate. A lab-triggered event runs the other direction. An environmental monitoring swab comes back presumptive positive for Listeria on a line. A finished-product result falls out of specification. A supplier certificate of analysis does not match the receiving record. In each case the first question is which lots are implicated, and the answer starts in the lab and works outward. A traceability build scoped entirely around ASN generation does nothing for that question.

Incoming-material records that never meet. The Receiving event requires capturing the traceability lot code of the incoming material. Your QA group also receives a certificate of analysis for that same lot, frequently as a PDF attachment. Two records describing one lot, held in two systems, joined by nothing durable. When an upstream supplier initiates a recall, you need both, at once, for a date range.

Which benchmark already tests all four seams?

None of this is new work invented by the traceability rule, and none of it is unique to food. It is the same laboratory informatics problem an environmental or clinical lab meets under a different regulator. It is the work that GFSI scheme audits have been testing for years.

> NOTE
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> A two to four hour forward and backward trace is the working benchmark auditors apply. The ASN does not test it. The lab-to-plant join does.

BRCGS expects a documented traceability test achievable within four hours, including a quantity reconciliation or mass balance. SQF requires traceability and recall exercises as separate documented activities. Several major retail and foodservice buyers set their own targets tighter than the scheme requirement, and a two to four hour forward and backward trace has become the working benchmark that auditors and regulators apply.

Those exercises test the lab-to-plant join. The ASN does not. Which means a supplier can build a clean ASN, hold a good SQEP score, and still fail a traceability challenge at the next surveillance audit, for reasons that had nothing to do with the shipping data.

What should you fix, and in what order?

Five things, and the order is the order in which each one makes the next testable.

- **Make the lot code one identifier, not two.** Whatever the plant assigns at Transformation is the identifier the lab records the sample against. If the systems cannot share it directly, the mapping belongs in software with an audit trail, not in a person's working knowledge.
- **Put the release gate where the shipment is created.** Disposition status is a condition the ERP checks before a shipment record can exist, not a status someone confirms by looking at a second screen.
- **Key environmental monitoring to line, shift and date.** A presumptive positive returns the affected production lots as a query result, not as a reconstruction of a schedule against a swab log.
- **Capture supplier certificates against the receiving lot code.** Not in an inbox. Against the lot, in the same system that holds the receiving record or one integrated with it.
- **Run a timed trace on a real lot, with the ASN included.** Pick a lot that shipped to your largest account, trace it backward to input lots and forward to the ASN, with a clock running. Whatever breaks is the project.

Sample tracking keyed to the production lot is the first item; batch record management with disposition exposed to the ERP is the second; application integration is how the second and fourth stop depending on a person.

What does this mean for contract labs serving retail suppliers?

Most contract testing laboratories are not themselves covered entities under the Food Traceability Rule, which reaches persons who manufacture, process, pack, or hold listed foods. Verify your own status rather than assuming either way, particularly if you hold or repack sample material in any form.

Your customers are covered, though, and their traceability work is quietly changing what they need from a lab. Three things are becoming procurement criteria in this segment. The first is results keyed to the customer's lot code rather than only to your sample identifier, so the result lands in their record without a manual join. The second is delivery through a portal or a data feed rather than an emailed PDF, so the result

is retrievable during a trace instead of searchable in an inbox. The third is turnaround commitments expressed against a release clock, because a customer running positive release is holding inventory against your report and paying an on-time delivery penalty when it arrives late.

A lab that returns a clean PDF creates downstream work for the customer. A lab that returns a structured result already keyed to the customer's lot is a different kind of supplier, and increasingly a differentiated one.

Where does a LIMS fit, and where does it not?

Being direct about the boundary: a LIMS does not generate your ASN, print your SSCC-18 pallet labels, or transmit your EDI 856. That work belongs to your ERP, your warehouse system, and your EDI provider, and any lab informatics vendor telling you otherwise is selling outside its category.

What a LIMS built for food and beverage work holds is the other half of the record:

- The lot-level QC record, keyed to the same lot code the plant assigns and the ERP ships, with sample tracking that follows the lot rather than the paperwork
- Specification management and batch release, with the release decision recorded against the lot and available as a condition the ERP can check
- Environmental monitoring programs run against a sampling plan, with results tied to line, location and date so that a positive returns affected lots
- Certificate of analysis generation against the shipped lot code, and portal access for customers who want to pull their own
- Instrument data import, so results reach the lot record without transcription

The federal date is real and it is coming. But the work that gets a supplier ready for July 2028 is the same work that answers a buyer's traceability challenge next quarter and a mock recall next month. Building for the customer's clock covers the regulator's clock. The reverse is not true.

> **How LabLynx handles this**
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> The part that usually determines whether this works is the boundary itself. LabLynx configures LIMS deployments to the lab's actual workflow rather than to a template, and handles the LIMS-to-ERP integration as part of the engagement, because the join between disposition and shipment is where the four seams above live. Among roughly 120 active client deployments, food and beverage operations span in-house QC labs at multinational manufacturers, national testing services, and regional analytical labs serving food and beverage clients.

Frequently asked questions

When does FSMA 204 take effect now?

July 20, 2028. The FDA published a proposed 30-month extension in the Federal Register in August 2025, and the Continuing Appropriations Act of 2026, passed in November 2025, directed the agency not to enforce the rule before that date. The substance is unchanged: the Food Traceability List, the Critical Tracking Events, the Key Data Elements and the 24-hour records requirement all stand as written.

Do Walmart's traceability rules apply only to listed foods?

No. Walmart and Sam's Club required suppliers of all food and beverage items to meet Advance Ship Notice and packaging requirements as of August 1, 2025, and the guidance states that the FDA extension does not change that expectation. Kroger, Albertsons, KeHE and Target have taken the same all-foods position. Only monitoring and enforcement specific to traceability begins with listed foods.

Is a contract testing lab covered by the Food Traceability Rule?

Usually not. The rule reaches persons who manufacture, process, pack or hold listed foods, which most testing laboratories do not do. Verify your own status rather than assuming it, particularly if you hold or repack sample material. Your customers are covered, and what they now need from a lab is changing: results keyed to their lot code, delivered through a portal, against a release clock.

How fast does a traceability exercise need to be?

BRCGS expects a documented traceability test achievable within four hours, including a quantity reconciliation or mass balance, and SQF requires traceability and recall exercises as separate documented activities. Several major buyers set tighter targets, and a two to four hour forward and backward trace is the working benchmark auditors apply. That exercise tests the lab-to-plant join; the ASN does not.

What is the difference between forward and backward trace here?

FSMA 204 and the retailer ASN both start with a lot and ask where it went, which is forward trace and what the rule was built to accelerate. A lab-triggered event runs backward: a positive environmental swab, an out-of-specification result or a mismatched supplier certificate, and the first question is which lots are implicated. An ASN-only build does nothing for that.

What does a LIMS do for FSMA 204, and what does it not do?

It does not generate the ASN, print pallet labels or transmit the EDI 856; those belong to the ERP, the warehouse system and the EDI provider. It holds the other half: the lot-level QC record keyed to the lot code the plant ships, the release decision the ERP can check before a shipment exists, environmental monitoring tied to line and date, and certificates against the shipped lot.

Sources and references

1. FSMA Final Rule on Requirements for Additional Traceability Records for Certain Foods

   U.S. Food and Drug Administration

2. Food Traceability List

   U.S. Food and Drug Administration

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Read the current version online

https://www.lablynx.com/resources/articles/fsma-204-retailer-requirements/

Downloaded September 23, 2026. LabLynx builds laboratory informatics software: LIMS, ELN, LIS and lab automation.