



FSMA 204 Pilot Program Invitation

Intercompany Data Sharing

Supporting Traceability Data Interoperability

Sponsored by the Partnership for Food Traceability

Purpose

The Partnership for Food Traceability (PFT) is inviting food supply chain stakeholders to participate in a collaborative pilot program with the following objectives:

1. Test the ability of food companies that use various data sharing methods (paper, GS1, or proprietary) to successfully send and receive complete Key Data Elements (KDEs) for relevant Critical Tracking Events (CTEs) with trading partners. This includes activities such as initial packing, receiving, and shipping Food Traceability List (FTL) food, as well as Congress-specified scenarios including food waste, food recovery, intra-company transfers, and customer returns of FTL food.
2. Optionally, participants using GS1 methods will have the ability to validate GS1's proposed solutions included in its FSMA 204 Implementation Toolkit. Learnings from this pilot may inform additional GS1 recommendations on data structuring.

Background

The Food Traceability Rule (FTR) establishes recordkeeping requirements for foods on the Food Traceability List (FTL), including the sharing of Key Data Elements (KDEs) at specific Critical Tracking Events (CTEs). The revised compliance date is July 20, 2028. The Rule offers flexibility in how KDEs are received, stored, and shared with trading partners, but many companies are still configuring how KDEs will be created, maintained, and shared.

Pilot Goals

1. **Document current-state practices** for sharing [Key Data Elements \(KDEs\) at Critical Tracking Events \(CTEs\)](#) with trading partners.
2. **Test and evaluate the success** of sharing KDEs, highlighting where challenges persist that prevent timely and accurate KDE sending and receipt.

3. **Identify implementation requirements**, including system modifications, trading partner coordination, process changes, time, and cost (labor and otherwise).
4. **Capture lessons learned** regarding workflow, cost considerations, and operational feasibility.
5. **Provide actionable recommendations** for industry stakeholders and the FDA based on real-world implementation experience.

Pilot Scope and Example Methodologies

Participants will define their own pilot scope based on CTEs and associated KDEs present in their operations (review Appendix A for more information). Participants may use paper, proprietary methods, or best practices in data structuring outlined by [GS1](#) and [PTI](#) to share data.

Who Should Participate

We encourage participation from all supply chain stakeholders that have at least one CTE where KDEs must be shared:

- **Harvesters, coolers, and initial packers of produce, seafood, and shell eggs** covered by the Rule
- **First land-based receivers of seafood** covered by the Rule
- **Food manufacturers, processors**, and any industry stakeholders shipping FTL food
- **Distributors and wholesalers with receiving and/or shipping CTEs**
- **Any industry stakeholder conducting recovery, customer returns, food waste, intra-company shipments of FTL food**
- **Retailers and restaurants** implementing KDE receipt and recordkeeping processes
- **Technology and solution providers** offering tools for KDE management and data exchange

Why Participate?

Across the industry, organizations have developed significant pilot learnings, but there is no centralized mechanism to collect those learnings and share them. By participating in this pilot program, you will:

- Have the opportunity to test your system with your trading partners before the go-live date in 2028; this important milestone will allow for visibility into the current gaps that need to be addressed before the compliance date.
- Talk with industry peers regarding common issues related to data sharing.



- Help understand and inform industry and FDA’s continued implementation of the Food Traceability Rule.
- Receive an early release of the PFT-compiled summary report regarding this pilot, as well as PFT-branded merchandise.

Timeline

The timeline for this project is as follows:

TABLE 1: Timeline and Milestones

Milestone	Date
Pilot invitation released	June 9, 2026
Participant registration deadline	Ongoing
Draft submissions to PFT due	Ongoing
Sharing information with FDA	Ongoing

Pilot Output Framework

Outputs from this pilot include:

- Data Sharing Validation and Reconciliation Spreadsheets (optional).
- Narrative report (see Appendix B), including portions of the participant’s traceability plan that explain data sharing structures and responsibilities.

There is no direct requirement for how much data must be pulled to participate in this pilot program. Similarly, there is no requirement to conduct a pilot with all KDEs if some KDEs have yet to be implemented. Participants can de-identify or otherwise anonymize information in the spreadsheets used to conduct the pilot.

Data Handling and Confidentiality

Participants are not expected to use real-time data; hypothetical or historic data may be used. Participants may also de-identify or otherwise anonymize any information in the data shared.

Regarding narrative reports, participants may choose their preferred format for the final work product: either a company-submitted report or a PFT-created, de-identified general



summary. Participants may also choose which audiences have access to view final reports or summaries.

PFT can coordinate with participants to maintain public-facing confidentiality for submitted narrative reports. However, company names and identifying information must be disclosed to PFT in order to participate in the program.

How to Participate

Interested in this pilot or have questions about how to participate? Use the contact form located at <https://pftraceability.org/pilot-program/> and reference “Pilot 3: Intercompany Data Sharing.”

Participation is voluntary and collaborative. This initiative offers the industry an opportunity to share practical implementation experiences that can inform FDA’s understanding of FTR readiness and potentially shape future guidance.

The Role of the Partnership for Food Traceability

The Partnership for Food Traceability (PFT) is coordinating this pilot program to enable more comprehensive and consistent collection of pilot learnings and to share those learnings with FDA. PFT is not designing or managing individual pilots. Instead, PFT provides a consistent framework for conducting pilots and reporting results, making it easier to compare learnings across participants. As a public-private partnership with FDA, PFT is well positioned to serve as a conduit for delivering collective pilot experiences to the agency. Learn more about PFT at <https://pftraceability.org/>.

References

[FDA Food Traceability Rule](#)

[GS1 Traceability Data Recommendations](#)

[EPCIS Standard from GS1](#)

[Produce Traceability Initiative Traceability Data Recommendations](#)

[Partnership for Food Traceability](#)



APPENDIX A: Instructions on completing your intercompany data sharing pilot

The purpose of this pilot is for two companies to test the ability to send and receive KDEs for one or more critical tracking events (CTEs) of your choosing, using your current system and data structures. For the narrative report, refer to Appendix B.

Follow the steps below and enter your responses in [this form](#) to indicate how you will structure the scope of your pilot.

Section 1: Fill out the name of both companies participating in the pilot, respective contact information, and describe which CTEs you will be targeting as part of this pilot.

- **Determine pilot scope.** Based on your industry, select the CTEs that apply to you and your collaborative partner for completion of this pilot exercise. A list of possible CTEs applicable by industry is shown below.

Industry	Potential CTEs Applicable for This Pilot						
	Harvest	Cooling	Initial Pack	First Land-Based Receiver	Shipping	Receiving	Transformation
Produce, shell eggs, or aquaculture farms that harvest, cool before packing, and pack	X	X	X		X		
Farms that do not cool or pack	X						
Packers of RACs		*	X		X	**	
Food repackers					X	X	X
Food manufacturers of FTL foods					X	**	X
Manufacturers transforming FTL foods into non-FTL foods						X	



Food distributors and warehouses					X	X	***
Retailers						X	
First land-based receivers				X	X		
Wild-caught seafood							

*If you are cooling before initial packing, this would be included.

**If you are receiving packed FTL RACs or other FTL foods, this would be included.

***If you are repacking an FTL food, then this would be assessed as “yes.”

- **Please share in narrative format the context of your specific data sharing scenario.**
- **Determine time scope for data collection and sharing.** PFT recommends including at least two weeks of activity, if possible. If this is not possible, please annotate your chosen time frame.
- **Outline the categories of FTL Foods included in this pilot.** Choose all that apply from the list below. Please see the [FTL website](#) for more information
 - ☐ FTL Cheese
 - ☐ Shell Eggs
 - ☐ Nut Butters
 - ☐ Fresh Cucumbers, Fresh Herbs, Fresh Peppers, Fresh Melons, Fresh Tomatoes, Fresh Tropical Tree Fruits, Fresh Leafy Greens
 - ☐ Fresh Sprouts
 - ☐ Fresh Cut Vegetables or Fresh Cut Fruit
 - ☐ FTL Finfish
 - ☐ FTL Crustaceans
 - ☐ FTL Molluscan Shellfish
 - ☐ Ready-to-Eat Deli Salads
 - ☐ Non-FTL Foods
- **Determine the Traceability Lot Codes (TLCs), SKUs, order numbers, and shipments in scope for this pilot.** PFT recommends limiting scope to three or fewer traceability lot codes.
- **Determine locations in scope for this pilot.** PFT recommends that you complete this exercise with at least three locations (e.g., three shipping locations,



or receiving from three farms). Please list below which locations you have selected to complete the pilot.

- _____
- _____
- _____

Section 2: Methodology for sharing data

- Please select the methods that you will be using to complete this pilot

Activities	Method A: Paper	Method B: Proprietary	Method C: Verify GS1 Methods
Identify FTL, product description	Text, Printed human readable on the box, label, packing list, invoice (refer to FDA published options)	Proprietary (e.g., UUID, URL)	GTIN, GLN, GS1 keys
Master data sharing		Proprietary (e.g., special data sharing network or spreadsheet, API)	Data hub, GDSN, spreadsheet
Event Data Sharing		Proprietary (e.g., special data sharing network or spreadsheet, API)	EDI, ASN, EPCIS, spreadsheet
Data Carriers		Proprietary (e.g., QR code, non-GS1 barcode, IoT)	Barcodes, RFID

- Submit your traceability plan, or write a narrative describing how you intend to share data (data hosting responsibilities, etc.). PFT can review this material upon request.

Section 3: Pilot deliverables. See the accompanying Excel worksheet.

- This is an example of how to test and summarize your outputs; you are more than welcome to use your own.*



APPENDIX B: Report Template

1. Description of Participant

- a. **Organization Overview for Both Trading Partners:** Describe your organizations, supply chain role, and relationship to Food Traceability List products.
- b. **Products and CTEs:** Describe the FTL products, categories, and CTEs included in pilot activities.
- c. **Current Data Sharing Protocol:** Briefly describe your current systems, data structure, and capabilities for traceability data capture and submission to FDA. If your traceability plan addresses this, share the information outlined in 21 CFR 1.1315.

2. Summary of Pilot Approach

- a. **Pilot Objectives:** What are you trying to learn or demonstrate? Examples include:
 - With the current data sharing strategy, what percentage of data can be sent and received successfully in the first iteration?
 - Are there significant advantages using one file format or data sharing strategy over another to successfully send and receive KDEs?
- b. **Scope and Timeline:** Describe the scope of pilot activities, the timeframe of data used, the time required to complete the pilot, locations included and any limitations.
- c. **Scenarios Addressed:** Describe the real-world scenarios tested. Include the number of traceability lot codes included in this pilot, and the number of records (can be aggregated) included.

3. Pilot Activities

- a. **Approaches Tested:** Describe the methodologies tested to send and receive KDEs.
- b. **System or Process Modifications:** Describe any system changes or process modifications required.
- c. **KDE Documentation:** Describe KDE documentation methods and the accuracy of data mapping.
- d. **Illustrate Outputs and Challenges:** A few areas of interest include:



- Calculate average time for sending and receiving all KDEs, along with the range (e.g., if you have manual labels that you have to manually key in versus scanning a pallet label and pulling down an ASN).
- Calculate the number of iterations the interaction takes to reconcile information 100% successfully (i.e., from kickoff to successful transmission) for each SKU for each shipping event.
- Failures: Calculate the percentage of KDEs received inaccurately, received unreadable, or failed for other reasons.
- Assess the quality and completeness of KDE information shared and received. What percentage of records were received with all KDEs accurate? Were there gaps?
- Capture the amount of time it took to upload and configure KDEs for sharing.
- Capture the effort required for total error correction and resubmission.
- If you compared different file formats, please illustrate any clear advantages or disadvantages to using either within your data sharing context.

4. Findings: Operational and Technical

a. **Operational Feasibility:** What worked well? What was challenging from an operational perspective? Was there any need to work with trading partners to obtain KDEs, and if so, how successful was that effort?

b. **Workflow Integration:** How did lot code capture and other KDE documentation integrate with existing workflows?

c. **System and Technology Considerations:** Describe system capabilities, limitations, and data format or exchange challenges.

5. Findings: Business and Organizational

a. **Cost and Resource Considerations:** What resources were required? What are the estimated costs for implementation at scale?

b. **Organizational and Change Management:** Describe training needs, process changes, organizational challenges, and stakeholder buy-in.



c. **Trading Partner Collaboration (if applicable):** Describe experiences working with upstream and downstream trading partners on KDE exchange.

6. Recommendations

a. **For Industry Stakeholders:** Based on your experience, what recommendations would you offer to other supply chain participants implementing KDE capture, documentation, and sharing?

b. **For FDA Consideration:** What guidance, clarification, or flexibility from FDA would support KDE sharing?

c. **For Future Guidance Development:** What topics or scenarios would benefit from additional industry guidance or FDA clarification?

7. Additional Information (Optional)

a. Future implementation plans

b. Additional scenarios you plan to test

c. Technology or process innovations under development

d. Questions or topics for further industry discussion

e. Supporting data, diagrams, or workflow illustrations

