

Update: Food Traceability Rule Enforcement Deadline Extended

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The enforcement deadline for the Food Traceability Rule has been extended from January 20, 2026 to July 20, 2028.

The Food Traceability Rule expands the recordkeeping requirements set forth in Section 204 of the [Food Safety Modernization Act](#) ("FSMA"), requiring food manufacturers and processors to maintain additional records for certain foods, including cheeses, shell eggs, fruits and vegetables, seafood, and ready-to-eat deli salads. The Rule is intended to improve food safety and recall response by enabling fast and reliable traceability of outbreak sources.

On August 7, 2025, the U.S. Food and Drug Administration ("FDA") [proposed a 30-month extension of the Food Traceability Rule's compliance date](#), moving it from January 20, 2026 to July 20, 2028. In November 2025, the [Continuing Appropriations, Agriculture, Legislative Branch, Military Construction and Veteran's Affairs, and Extensions Act of 2026](#) directed the FDA not to enforce the Food Traceability Rule prior to July 20, 2028.

Among other requirements, the Food Traceability Rule requires compliance from domestic and foreign companies who manufacture, process, pack, or hold foods on the [Food Traceability List \("FTL"\)](#). Those persons must maintain records containing Key Data Elements ("KDEs") associated with specific Critical Tracking Events ("CTEs") and provide this information to the FDA within 24 hours or within some reasonable time to which the FDA has agreed.

For guidance on complying with the Food Traceability Rule or questions regarding its impact on your business, please reach out to [Catherine T. Begley](#), [Timothy G. Dietrich](#), or anyone in Barley Snyder's [Food & Agribusiness Industry Group](#).

WRITTEN BY:



Catherine T. Begley

Counsel

Tel: (484) 339-4149

Email: cbegley@barley.com