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Food Traceability Rule vs. Produce Safety Rule

Many growers are already familiar with the [Produce Safety Rule \(PSR\)](#) through Produce Safety Alliance (PSA) training or on-farm food safety programs. With the introduction of the [Food Traceability Rule](#) (FSMA Section 204), a common source of confusion is how these two rules relate to one another.

This publication explains the key differences between the Food Traceability Rule and the Produce Safety Rule, what each rule is designed to accomplish, and how they work together within the **Food Safety Modernization Act (FSMA)**. It is intended to support understanding and clarification, not to provide step-by-step compliance instructions.

Why This Matters for Your Operation

Understanding how the Food Traceability Rule differs from the Produce Safety Rule helps ensure that important requirements are not overlooked. Many operations assume that compliance with one rule satisfies the other, which can lead to gaps in preparation and potential market risks.

The Food Traceability Rule was originally scheduled for implementation beginning Jan. 20, 2026. Enforcement was delayed to allow additional time for industry readiness. Even with this extension, operations should begin evaluating how this rule relates to existing FSMA requirements.

Overview of the Two Rules

Both the Food Traceability Rule and the Produce Safety Rule were established under FSMA, but they address different aspects of food safety.

Produce Safety Rule (PSR)

The Produce Safety Rule focuses on preventing contamination during growing, harvesting, packing and holding of produce on farms. It emphasizes good agricultural practices that reduce the risk of foodborne illness before contamination occurs.

Key areas addressed under the PSR include:

- Worker health, hygiene and training
- Agricultural water use
- Biological Soil Amendments of Animal Origin (BSAAO)
- Equipment, tools and sanitation
- Wildlife and domestic animal intrusion

The PSR primarily applies to produce farms that grow commodities usually consumed raw and meet the rule's coverage thresholds. Coverage depends on factors such as sales volume and exemptions. For detailed guidance, refer to FDA resources or the companion Extension publication on coverage.

Food Traceability Rule (FSMA Section 204)

The Food Traceability Rule focuses on tracking the movement of certain high-risk foods through the supply chain. Rather than emphasizing on-farm practices, this rule requires standardized records so that food can be traced quickly during a foodborne illness outbreak or recall.

The Food Traceability Rule applies only to foods on the FDA's [Food Traceability List \(FTL\)](#) and to operations that grow, pack, process, ship or hold those foods, unless an exemption applies.

How the Rules Work Together

The Food Traceability Rule does not replace the Produce Safety Rule. Instead, the two rules address different but complementary parts of food safety.

- The Produce Safety Rule helps reduce the likelihood that contamination occurs on the farm.
- The Food Traceability Rule helps ensure that, if contamination does occur, affected foods can be identified and removed from the market quickly.

Key Differences Between the Two Rules

Criteria	Produce Safety Rule (PSR)	Food Traceability Rule (FTR)
Purpose	Prevent contamination before it occurs	Enable rapid traceback and response after contamination is identified
Primary focus	On-farm food safety practices	Movement of food through the supply chain
Who is affected	Produce farms growing covered produce	Farms, packers, processors, shippers, distributors and others handling foods on the Food Traceability List
Type of requirements	Practice-based requirements (e.g., hygiene, sanitation, water quality assessments, and worker training)	Record-based requirements (traceability records tied to food movement)

An operation may be subject to both rules, depending on the foods handled and the activities performed. Produce farms that are not covered under the FSMA Produce Safety Rule (21 CFR §112.4(a)) are not subject to the Food Traceability Rule for farming activities in many cases, as reflected in FDA guidance. Operations that perform activities beyond farming, such as processing, packing, or holding food, should still evaluate whether the Food Traceability Rule applies to those activities. Together, these rules help both prevent contamination and respond effectively if a food safety issue occurs.

Common Misunderstandings

- *Myth:* "If I comply with PSR, I am already complying with FSMA 204."
Reality: PSR compliance does not cover traceability recordkeeping requirements under FSMA 204.
- *Myth:* "FSMA 204 applies only to large operations."
Reality: Coverage depends on foods handled, activities performed, and exemptions, not just operation size.
- *Myth:* "Traceability is part of my food safety plan."
Reality: While traceability supports food safety, FSMA 204 focuses on recordkeeping for food movement, not preventive practices.

Important Consideration

Even if your operation is not covered under one rule, buyers such as grocery stores or distributors may still expect traceability practices. Understanding both rules can help you meet these expectations and maintain market access.

What This Means for Growers

Understanding the difference between the Produce Safety Rule and the Food Traceability Rule helps operations:

- Identify which FSMA rules apply to their activities
- Avoid assuming that compliance under one rule satisfies another
- Prepare for future training and traceability requirements



Operations that already comply with the Produce Safety Rule may still need to evaluate whether the Food Traceability Rule applies to them.

Next Step for You

Evaluate which FSMA rules apply to your operation and identify any gaps in your current practices or recordkeeping.

If you are unsure, consider reviewing FDA resources or consulting with Extension or regulatory experts.

Additional Resources

For more details on exemptions related to PSR & FTR, refer: [Exemptions Relevant to Produce Farms Under the Produce Safety Rule and the Food Traceability Rule | FDA](#)

Related Publications

FS-73-W What is FSMA Section 204, the Food Traceability Rule?

FS-74-W The Food Traceability Rule — Who Does It Cover?

Disclaimer

This publication is for educational purposes only and does not constitute legal advice. For official regulatory guidance, consult the U.S. Food and Drug Administration or a qualified professional.