



The Global Language
of Business

BEST PRACTICE GUIDE

3 Steps to Use GDSN for FSMA Rule 204

For Global Data Synchronization Network™ (GDSN®) users to share product information, specific data fields are recommended for FSMA Rule 204 compliance. These attributes should notify recipients of the compliance or exemption of the final product or ingredient but do not replace formal notifications or additional dialogue. The use of these attributes is also advisable for imported products.

3 Steps to Use GDSN for FSMA Rule 204

01 Confirm if supplier/processor exemptions are applicable.

- Check if your organization qualifies for U.S. Food & Drug Administration (U.S. FDA) partial or full product exemptions in section 1.1305 of the final rule. Use the [U.S. FDA tool](#) to verify.
- If applicable, a written agreement between entities may be required for product setup. This must include the effective date, printed names, signatures, and substance of the agreement. Additional records may apply. Consult legal counsel and internal teams for the next steps.

03 Use recommended GDSN attributes.

03A The product is subject to the rule.

Attribute	Selections
RegulationTypeCode	TRACEABILITY_REGULATION
RegulatoryAct (US LCL)	FSMA204
IsTradItemRegulationCompliant	TRUE NOT_APPLICABLE

A Few Notes to Keep in Mind:

- US Local Code List (US LCL) code values are subject to change based on GS1 US FSMA 204 workgroup recommendations. See [US LCL](#) for the most up-to-date list of code values.
- Data pool descriptive names may differ from code values.
- Data pool capabilities for the US LCLs will vary. Most US LCLs will be in open text format, but validation rules, min/max character limitations, drop-downs, or examples of code values could be implemented by the data pool to optimize the user experience and limit code value error input.
- To ensure no Catalogue Item Confirmation (CIC) synchronization errors from your recipient, ensure code values are spelled exactly as listed. (Code values MUST be written in CAPS LOCK, with underscores and no spaces.)
- To ensure attributes function collaboratively for optimal performance, the following GDSN rule can be implemented as a recipient requirement:

If IsTradItemRegulationCompliant = Not Applicable and regulatoryAct = FSMA204, then the code value for US LCL RegulationRestrictionsAndDescriptors must be provided.

02 Determine if the final product or ingredient is subject to FSMA Rule 204.

- The brand owner can confirm to the recipient whether the final product or ingredient is subject to FSMA Rule 204.
- The brand owner can inform the recipient if the final product or ingredient is exempt from FSMA Rule 204.

03B The product is not subject to the rule.

Attribute	Selections
RegulationTypeCode	TRACEABILITY_REGULATION
RegulatoryAct (US LCL)	FSMA204
IsTradItemRegulationCompliant	TRUE NOT_APPLICABLE
RegulationRestrictionsAndDescriptors Code Values (US LCL)	NOT_COVERED_BY_FTL

03C The product may contain a U.S. FDA Food Traceability List (FTL) ingredient, but is not subject to the rule.

Attribute	Selections
RegulationTypeCode	TRACEABILITY_REGULATION
RegulatoryAct (US LCL)	FSMA204
IsTradItemRegulationCompliant	TRUE NOT_APPLICABLE
RegulationRestrictionsAndDescriptors Code Values (US LCL)	KILL_STEP_APPLIED OR NOT_COVERED_BY_FTL

Code Values With Definitions:

- **KILL_STEP_APPLIED:** The Product or ingredient is on the FTL but underwent a kill step or other critical control point.
- **NOT_COVERED_BY_FTL:** The final product or ingredient is not subject to the rule because it is either not included in the U.S. FDA FTL or has undergone a processing step other than a kill step or critical control point that exempts it from the rule.