

# Reference Sheet for FSMA Compliance Dates

Updated: 1 October 2017



## General Compliance Period

FSMA Rule	Final Rule Effective Date	Required Compliance	Compliance Deadline
Preventive Controls for Human Food	11-16-15	General Compliance Date	9-19-16
		Facilities solely packing or holding RACs	1-26-18
		Secondary activity farms that do not meet ownership requirements	1-26-18
		Customer Written Assurances (§ 117.136(a)(2)(ii), (3)(ii), and (4)(ii))	9-19-18
		PCHF Supply-Chain Program	3-17-17**
Preventive Controls for Animal Feed	11-16-15	General Compliance Date (cGMP)	9-19-16
		Facilities solely packing holding RACs (cGMP)	1-26-18
		Secondary activity farms that do not meet ownership requirements	1-26-18
		General Compliance Date (PC)	9-18-17
		Facilities solely packing or holding RACs (PC)	1-28-19
		Secondary activity farms that do not meet ownership requirements (PC)	1-28-19
Produce Safety	1-26-16	General Compliance Date	1-26-18
		Ag water provisions*	1-26-22
		Commercial Processing Exempt §112.2(b)(3) customer written assurances	1-27-20
		Sprouts (Subpart M)	1-26-17
		Commercial Processing Exemption §112.2(b)	1-28-19
Foreign Supplier Verification Program	1-26-16	Importer not subject to PC or produce rules	5-30-17 <sup>1,6</sup>
		Importer of human food whose Large Foreign Importers required to comply with PCHF	5-30-17 <sup>1,6</sup>
		Importer whose Large Foreign Supplier Required to comply with Produce Safety Rule	7-26-18 <sup>1,6</sup>
		Importer whose Large Foreign Supplier required to comply with sprout requirements of Produce Safety Rule	7-26-17 <sup>1,6</sup>
Sanitary Transportation	6-6-16		4-6-17
Intentional Adulteration	7-26-16		7-26-19

## Small Business Compliance Period

FSMA Rule	Final Rule Effective Date	Required Compliance	Compliance Deadline
Preventive Controls for Human Food (<500 FTE)	11-16-15	General Compliance Date	9-18-17**
		Facilities solely packing or holding RACs	1-28-19
		Secondary activity farms that do not meet ownership requirements	1-28-19
		Customer Written Assurances (§ 117.136(a)(2)(ii), (3)(ii), and (4)(ii))	9-18-19
Preventive Controls for Animal Feed (<500 FTE)	11-16-15	General Compliance Date (cGMP)	9-18-17
		Facilities solely packing holding RACs (cGMP)	1-28-19
		Secondary activity farms that do not meet ownership requirements (cGMP)	1-28-19
		General Compliance Date (PC)	9-17-18
		Facilities solely packing holding RACs (PC)	1-27-20
		Secondary activity farms that do not meet ownership requirements (PC)	1-28-19
Produce Safety (\$250-500k sales)	1-26-16	General Compliance Date	1-28-19
		Ag water provisions*	1-26-23
		Commercial Processing Exempt §112.2(b)(3)	1-26-21
		Customer written assurances	
		Sprouts (Subpart M)	1-26-18
Foreign Supplier Verification Program	1-26-16	Commercial Processing Exempt §112.2(b)	1-26-21
		Importer of human food whose Small Foreign Supplier required to comply with PCHF	3-19-18 <sup>1,6</sup>
		Importer whose Small Foreign Supplier required to comply with sprout requirements of Produce Safety Rule	7-26-18 <sup>1,6</sup>
		Importer whose Small Foreign Supplier is a farm producing sprouts and eligible for a Qualified Exemption under the Produce Safety Rule	7-26-18 <sup>1,6</sup>
		Importer whose Small Foreign Supplier required to comply with Produce Safety Rule	7-29-19 <sup>1,6</sup>
Importer whose Small Foreign Supplier subject to Produce Safety Rule and eligible for a Qualified Exemption	7-29-19 <sup>2, 3, 4, 5</sup>		
Sanitary Transportation (<500 Employees) <sup>∞</sup>	6-6-16		4-6-18
Intentional Adulteration (<500 Employees)	7-26-16		7-26-20

## Very Small Business Compliance Period

FSMA Rule	Limit	Final Rule Effective Date	Required Compliance	Compliance Deadline			
PC Human Food	<\$1M	11-16-15	Exempt Qualified Facility (Recordkeeping) General Compliance Date	1-1-16 9-17-18			
			Facilities solely packing or holding RACs	1-27-20			
			Secondary activity farms that do not meet ownership requirements	1-27-20			
			Customer Written Assurances (§ 117.136(a)(2)(ii), (3)(ii), and (4)(ii))	9-18-20			
PC Animal Feed	<\$2.5M feed	11-16-15	General Compliance Date (cGMP) Facilities solely packing holding RACs (cGMP) Secondary activity farms that do not meet ownership requirements (cGMP)	9-17-18 1-27-20 1-27-20			
			General Compliance Date (PC) Facilities solely packing holding RACs (PC) Secondary activity farms that do not meet ownership requirements (PC)	9-17-19 1-26-21 1-26-21			
			Produce Safety	\$25-\$250K	1-26-16	General Compliance Data Ag water provisions* Commercial Processing Exempt §112.2(b)(3) customer written assurances	1-27-20 1-26-24 1-26-22
						Sprouts (Subpart M) Commercial Processing Exempt §112.2(b)	1-28-19 1-26-21
FSVP	<\$1M food† <\$2.5M feed†	1-26-16	Importer of human food whose Qualified Foreign Supplier (including Very Small Foreign Supplier) required to comply with PCHF	3-18-19 <sup>1,6</sup>			
			Importer whose Very Small Foreign Supplier is a farm producing sprouts and eligible for a Qualified Exemption under the Produce Safety Rule	7-26-19 <sup>1,6</sup>			
			Importer whose Very Small Foreign Supplier required to comply with Produce Safety Rule	7-27-20 <sup>1,6</sup>			
			Importer whose Very Small Foreign Supplier required to comply with Sprout Requirements of Produce Safety Rule	7-29-19 <sup>1,6</sup>			
			Importer whose Very Small Foreign Supplier subject to Produce Safety Rule and eligible for a Qualified Exemption	7-27-20 <sup>1,6</sup>			
Sanitary Transport	N/A <sup>§</sup>	6-6-16	N/A <sup>§</sup>	N/A <sup>§</sup>			
Intentional Adulteration ▲	<\$10M	7-26-16		7-26-21			

## **Footnotes**

- \* On September 13, 2017 FDA [announced in the Federal Register](#) a proposed compliance date extension for the agricultural water requirements of the Produce Safety Rule.
- \*\* Facilities must comply with the PCHF Supply-Chain Program the latter of 3/17/17 for general compliance (9/18/17 for small businesses) or 6 months after a supplier is required to comply with the applicable rule.
- † All importers must comply with FSVP requirements 30 months after the final rule OR 6 months after their foreign suppliers' reach their FSMA compliance deadlines, whichever is later. "Very small importers" (<\$1 M human food; \$2.5M animal food) and "importers of food from very small foreign suppliers" ("qualified facilities" under the PCHF or PCAF; farms with annual sales of \$25,000 or less, and shell egg producers with fewer than 3,000 laying hens) are subject to modified requirements.
- § If there is no special compliance period noted, then follow the General Compliance Period rule.
- ∞ Small Businesses - other than motor carriers who are not also shippers and/or receivers employing fewer than 500 persons and motor carriers having less than \$27.5 million in annual receipts.
  - ▲ Only modified reporting requirements apply to qualified business with <\$10M in annual food sales.
  - 1 Except for certain provisions concerning written customer assurances. Additional two years to comply with these specific requirements.
  - 2 Except for facilities that only pack and/or hold raw agricultural commodities that are produce and/or nut hulls and shells. Compliance date for these facilities extended approximately 16 months to match the compliance dates for businesses in the same size categories in the produce safety regulation.
  - 3 Except for facilities that would qualify as a secondary activities farm except that they do not meet the ownership criterion. Compliance date for these facilities extended approximately 16 months to match the compliance dates for businesses in the same size categories in the produce safety regulation.
  - 4 Except for facilities that color raw agricultural commodities. Compliance date for these facilities extended approximately 16 months to match the compliance dates for businesses in the same size categories in the produce safety regulation.
  - 5 Except for facilities solely engaged in the ginning of cotton. Compliance date for these facilities extended approximately 16 months to match the other extension dates that relate to the "farm" definition.
  - 6 Except for the importation of food contact substances. Additional two years to comply with the FSVP requirements.

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