A FSMA 204 READINESS SCENARIO

The trace request lands at 6:47 PM. Here's what happens next.

A real outbreak, a hypothetical distributor, and what it looks like to answer a lot level trace request in minutes instead of weeks.

SCOTI™, The Supply Chain Execution Platform for Distribution
connect@scoti.io · scoti.io

WHY THIS MATTERS

A real outbreak from this summer

488	65	34
ILLNESSES	HOSPITALIZED	STATES

In summer 2026, FDA and CDC traced a multistate Salmonella outbreak linked to fresh jalapeños back through Coast Citrus Distributors to a common grower in Sinaloa, Mexico. Recalls ran downstream through restaurants, retailers and food processors. Illnesses started between June 16 and August 26. CDC declared the outbreak over on October 2, 2026, and FDA reported it could not determine how the peppers were contaminated.[1]

This is the kind of event FDA's Food Traceability Rule, FSMA 204, was written for. For foods on the Food Traceability List, covered companies must keep linked, lot level records with Key Data Elements at each Critical Tracking Event (harvesting, cooling, packing, shipping, receiving and transformation) and produce them within 24 hours of a request, in an electronic sortable spreadsheet when FDA asks. The compliance date is July 20, 2028.[2]

> **The gap:** a 24 hour request assumes the records already exist and are linked across every company that touched the product. For many distributors that data still sits in paper logs, supplier PDFs, and warehouse and transportation systems that don't talk to each other. Reconciling it by hand is what turns a 24 hour request into a long investigation.

Illustrative scenario, on our roadmap. Cold Chain with FSMA 204 traceability is coming next in SCOTI. It is not live today. This walkthrough shows what it is being built to do. Meridian Foodservice Distribution is a hypothetical company. It is not a real company or SCOTI customer, and the figures are typical estimates, not audited data.

THE WALKTHROUGH

One day at Meridian Foodservice

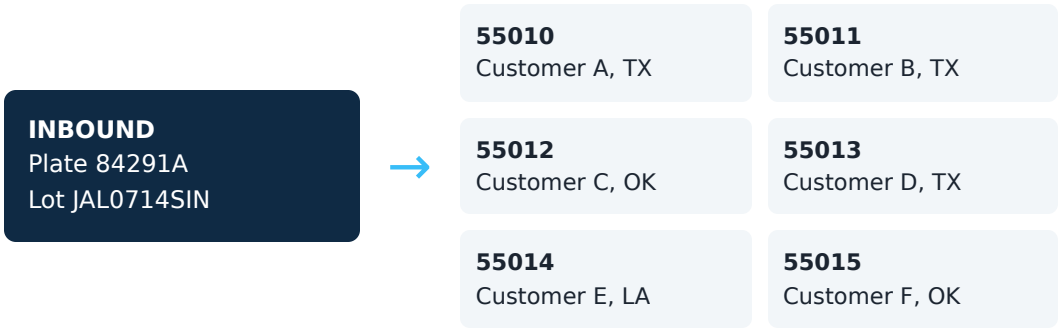
Mid size broadline distributor · 3 distribution centers · about 9,500 active SKUs · about 140 outbound loads a day

6:12 AM	**RECEIVING** A load of fresh jalapeños arrives. The warehouse system assigns inbound license plate 84291A to supplier lot JAL0714SIN. SCOTI would tie that lot to the inbound PO and the receiving record.
9:40 AM	**TRANSFORMATION** Product is repacked into case packs for six customer orders, a transformation event under FSMA 204.
11:15 AM to 2:30 PM	**BUILDING** Six outbound pallets are built from that inbound plate, outbound plates 55010 through 55015. SCOTI would link each one back to the source lot as it's built, not reconstructed later.
3:00 PM	**SHIPPING** Six loads leave for six customers in three states. Ship date, quantity and destination are tied to each pallet on the dispatch record as the truck leaves the dock.
6:45 PM	**ALERT** A state health department names supplier lot JAL0714SIN in a multistate alert.
6:47 PM	**TRACE** Meridian's ops lead searches SCOTI for the lot. Every pallet tied to it, six customers, exact ship dates and quantities, would come back in one search.
6:52 PM	**REVIEW** The linked shipping and receiving records are in front of Meridian's QA lead, five minutes after the alert. QA makes the call on what goes to the agency.

LOT GENEALOGY

One inbound lot. Six outbound pallets. One search.

This is what "linked, lot level records" means in practice: an inbound plate tied to every outbound pallet it fed.



Without a connected trace, and with SCOTI (coming next)

Stage	Without a connected trace	With SCOTI traceability (coming next)
Lot linkage	Rebuilt by hand from receiving logs, pack sheets and BOLs	Linked as each inbound and outbound pallet is recorded
Where it went	Pieced together after the agency asks	Pulled from linked shipment records
Recall scope	Often broad, set by region or supplier	Set by the actual lot and shipment records
24 hour request	A scramble across every file and system	A search, then QA reviews the linked records

JULY 20, 2028

The distributors ready for it won't be the ones scrambling that week

Coming next. Cold Chain with FSMA 204 traceability is on the SCOTI roadmap. For foods on FDA's Food Traceability List, it is being built to keep the shipping and receiving Key Data Elements, the events under your control, on the same record as the load.

Live today. One live record per load, PO to proof of delivery. Control Tower watches temperature and location from the telematics, reefer and sensor data you connect and alerts on a load running warm, and Dispatch raises the exception. Proof of delivery ties temperature and time to the stop. We sit on top of the warehouse, routing and telematics systems you already run. Nothing gets ripped out.

Your QA team makes the food safety calls. Readiness starts with the records you already keep on every load.

See where your records stand today.
Start with a free Execution Gap Report on your own data, or book a 30 minute walkthrough at scoti.io. Email connect@scoti.io.

1. CDC, Investigation Update: Salmonella Outbreak, August 2026, final update October 2, 2026, cdc.gov; FDA, Outbreak Investigation of Salmonella: Jalapeño (August 2026), fda.gov.
2. FDA, Requirements for Additional Traceability Records for Certain Foods: Compliance Date Extension, Federal Register, August 7, 2025.

Meridian Foodservice Distribution is hypothetical. It is not a real company, customer or endorsement, and the figures shown are typical estimates, not audited data.