

Food Safety Modernization Act: Compliance Dates and Deadlines

• General Compliance Period •

Proposed Rule	Final Rule	Requirement	Deadline
Preventive Controls for Human Food	09-17-15	1 year after final rule	09-18-16
Preventive Controls for Animal Feed	09-17-15	2 years after final rule	09-18-17
Produce Safety	10-31-15	2 years + 60 days from final rule*	12-31-17
Foreign Supplier Verification Program	10-31-15	18 months from final rule†	04-31-17
3rd Party Accreditation & Certification	10-31-15	After Model Accreditation Standards‡	-
Sanitary Transportation	03-31-16	1 year from final rule	03-31-17
Food Defense	05-31-16	1 year + 60 days from final rule	07-31-17

• Small Business Compliance Period (less than 500 employees business-wide) •

Proposed Rule	Final Rule	Requirement	Deadline
Preventive Controls for Human Food	09-17-15	2 years from final rule	09-18-17
Preventive Controls for Animal Feed	09-17-15	3 years from final rule	09-18-18
Produce Safety	10-31-15	3 years + 60 days from final rule*	12-31-18
Foreign Supplier Verification Program	N/A§	N/A§	N/A§
3rd Party Accreditation and Certification	N/A§	N/A§	N/A§
Sanitary Transportation	03-31-16	2 years from final rule	03-31-18
Food Defense	05-31-16	2 years + 60 days from final rule	07-31-18

• Very Small Business Compliance Period (business has annual food sales below the applicable limit) •

Proposed Rule	Limit	Final Rule	Requirement	Deadline
PC Human Food	< \$1M	09-17-15	3 years from final rule	09-18-18
PC Animal Feed	< \$2.5M	09-17-15	4 years from final rule	09-18-19
Produce Safety	< \$250K	10-31-15	4 years + 60 days from final rule*	12-31-19
FSVP	< \$500K	10-31-15	18 months from final rule†	04-31-17
3PAC	N/A§	N/A§	N/A§	N/A§
Sanitary Transportation	N/A§	N/A§	N/A§	N/A§
Food Defense	< \$10 M	05-31-16	3 years + 60 days from final rule	07-31-19

* All farms have an additional 2 years to comply with certain water-related requirements.

† All importers must comply with FSVP requirements 18 months after the final rule OR 6 months after their foreign suppliers' reach their FSMA compliance deadlines, whichever is later.

‡ 3PAC's provisions are effective immediately following the final rule, but can only be implemented after publication of Model Accreditation Standards, which are yet to be released by FDA.

§ If there is no special compliance period noted, then follow the General Compliance Period rule.