

The FDA has not issued a clear, fixed calendar date about when the 10-digit NDC date will run out of digits. Depending on how you ask ChatGPT, you may get different answers. I made this mistake and have documented my learnings about how the “official” expiration dates are determined. Below are my notes, and I hope that they help you. Good luck in your NDC12 efforts. (Herb)

What FDA *has* said clearly

The FDA has made **three explicit, official statements**, all in rulemaking and supporting materials:

1. **The 10-digit NDC will end.**

This is unambiguous. The proposed rule replaces all formats with a mandatory 12-digit NDC.

2. **The end date is relative, not calendar-based.**

FDA ties expiration to rule timing:

- 5 years after the Final Rule publication, FDA stops issuing 10-digit NDCs.
- 3 years after that, FDA stops allowing 10-digit NDCs on labeling.
After that point, the 10-digit NDC is effectively dead.

3. **FDA estimates exhaustion of 10-digit capacity in 10–15 years.**

- This estimate appears repeatedly in FDA documents.
- Using a 2022 baseline, this places exhaustion roughly **2032–2037**.
- The use of the 2022 baseline aligns with when the FDA published the [proposed rule for NDC12](#)

What FDA *has not* said

- No FDA document states: “The 10-digit NDC expires in 2030.”
- No FDA document states: “The 10-digit NDC expires in 2033.”
- No FDA document states: “The 10-digit NDC expires in 2035.”

Those dates are **industry extrapolations**, not FDA declarations.

Why “2033” keeps appearing

2033 shows up because it is the **math midpoint**, not because FDA blessed it.

Typical reasoning:

- Final Rule assumed around 2024.
- Add 5 years. New NDCs become 12-digit in ~2029.
- Add 3 more years. All labeling must be 12-digit by ~2032.
- People round forward and say **2033**.

Clean logic. Not an FDA quote.

Bottom line

- **FDA has clearly stated the mechanism and timing structure.**
- **FDA has not stated a specific expiration year.**
- **Early-to-mid 2030s is supported by FDA projections.**
- **Any single year, including 2033, is inference, not policy.**