Looking Forward and Looking back
How companies can establish a Robust and Compliant Traceability Program
Food Traceability Final Rule: Requirements for Additional Traceability Records for Certain Foods (FSMA Section 204)

May 9, 2023
Food Safety Summit

Chris Waldrop, Senior Health Scientist, CFSAN, FDA
Subpart J – “one up, one back”

- Transporters and “non-transporters” of food
- Immediate previous source and immediate subsequent recipient of food products
- Exempts farms and restaurants
What will the Food Traceability Rule require?

- Persons who manufacture, process, pack, or hold foods on the Food Traceability List
- Covers the entire food supply chain
- Includes both foreign and domestic entities
Common questions on coverage

- Foreign entities?
- Farms?
- Importers?
- Aquaculture farms?
- Brokers?
- Wild-caught seafood?
- Distributors?
- Manufacturers?
- Repackers?
- Retail Food Establishments?
- Warehouses?
- Airline caterers?

If you manufacture, process, pack, or hold foods on the FTL, you are covered

*Full or partial exemptions may apply for your situation
Exemptions

Farms
- Certain small produce farms
- Certain small shell egg producers
- Certain other small RAC producers
- Certain food produced + packaged on farm
- Farms selling food directly to consumers

Commingled raw agricultural commodities (RACs)
- Certain commingled RACs (not fruits & vegetables)
- Certain RACs that will be commingled

Fishing vessels, molluscan shellfish
- Owner/operator/agent in charge of a fishing vessel
- Raw bivalve molluscan shellfish

Retail food establishments (RFEs), restaurants
- Certain small RFEs + restaurants
- RFEs or restaurants purchasing food directly from a farm
- RFEs or restaurants purchasing food from another RFE or restaurant on ad hoc basis

Certain types of processing
- Produce and shell eggs that receive certain processing
- Exemptions related to a kill step
- Exemptions related to changing a food to a form not on the list

Personal consumption, holding food for individual consumers
- Personal consumption
- Holding food for individual consumers

Other
- Produce listed as “rarely consumed raw”
- Farm-to-school/farm-to-institution programs
- Foods regulated by USDA
- Transporters of food
- Non-profit food establishments
- Food for research or evaluation
Exemptions Tool

Exemptions to the Food Traceability Rule

You are subject to the Food Traceability final rule, unless an exemption applies. To determine whether you may be exempt, please click on any of the following categories that may apply to you:

- Farms
- Commingling raw agricultural commodities (RACs)
- Fishing vessels, molluscan shellfish
- Retail food establishments (RFEs), restaurants
- Certain types of processing
- Personal consumption, holding food for specific consumers
- Other

https://collaboration.fda.gov/tefcv13/
<table>
<thead>
<tr>
<th>Food Traceability List</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Cheese (made from pasteurized milk), fresh soft or soft unripened</td>
<td>Tomatoes (fresh)</td>
</tr>
<tr>
<td>Cheese (made from pasteurized milk), soft ripened or semi-soft</td>
<td>Tropical tree fruits (fresh)</td>
</tr>
<tr>
<td>Cheese (made from unpasteurized milk), other than hard cheese</td>
<td>Fruits (fresh-cut)</td>
</tr>
<tr>
<td>Shell eggs</td>
<td>Vegetables (fresh-cut)</td>
</tr>
<tr>
<td>Nut butters</td>
<td>Finfish (histamine-producing species) (fresh and frozen)</td>
</tr>
<tr>
<td>Cucumbers (fresh)</td>
<td>Finfish (species potentially contaminated with ciguatoxin) (fresh and frozen)</td>
</tr>
<tr>
<td>Herbs (fresh)</td>
<td>Finfish, species not associated with histamine or ciguatoxin (fresh and frozen)</td>
</tr>
<tr>
<td>Leafy greens (fresh)</td>
<td>Smoked finfish (refrigerated and frozen)</td>
</tr>
<tr>
<td>Leafy greens (fresh-cut)</td>
<td>Crustaceans (fresh and frozen)</td>
</tr>
<tr>
<td>Melons (fresh)</td>
<td>Molluscan shellfish, bivalves (fresh and frozen)</td>
</tr>
<tr>
<td>Peppers (fresh)</td>
<td>Ready-to-eat deli salads (refrigerated)</td>
</tr>
<tr>
<td>Sprouts (fresh)</td>
<td></td>
</tr>
</tbody>
</table>
Food Traceability List

- Foods specified as “fresh” on the FTL
- Fresh FTL foods used in multi-ingredient foods
- Changing the form of the food
- Foods not specified as “fresh” used in multi-ingredient foods
- Applying a kill step to the food
Updating the Food Traceability List

• We anticipate updating the list approximately every 5 years
• We will publish a notice in the *Federal Register* with the proposed changes, providing an opportunity for public comment
• A second *Federal Register* notice will state the final decision on any changes being made
• Additions to the list would become effective 2 years after this second *Federal Register* notice, unless otherwise stated
• Deletions from the list would be effective immediately
CTE and KDE Framework

The role of the entity in the supply chain defines the data it must keep and share

Critical Tracking Events
Harvesting, Cooling, Initial Packing, First Land-based Receiving, Shipping, Receiving, and Transforming are Critical Tracking Events (CTEs) for which records would be required.

Key Data Elements
Required records would need to contain specific Key Data Elements (KDEs). The KDEs would depend on the CTE being performed.

The KDEs required would vary depending on the CTE that is being performed. The records required at each CTE would need to contain and link the KDEs to the traceability lot.
Emphasis on...

- Keeping and sharing KDEs
- Traceability Lot Code (TLC)
- Traceability Lot Code Source (TLC Source)
- Traceability Plan
- Working with supply chain partners
Supply Chain Example: Fresh Produce

Traceability Plan
Partial Supply Chain Example

Traceability Plan
Manufacturer Example

**Receiving KDEs**
- For each traceability lot of FTL food received, the following KDEs should be linked to the traceability lot:
  - TLC*
  - How much you received*
  - What you received*
  - Where it came from*
  - Where you received it*
  - Date you received it*
  - Traceability Lot Code Source information*
  - Reference document information

* indicates KDEs you receive

**Transformation KDEs**
- For each traceability lot of FTL food used as an ingredient, the following KDEs should be linked to the new traceability lot:
  - Incoming TLC*
  - How much you used
  - What you used*

- For each new traceability lot of food produced:
  - New TLC
  - Where you transformed it (i.e., the TLC Source)
  - Date you made it
  - What you made
  - How much you made
  - Reference document information

**Shipping KDEs**
- For each traceability lot of FTL food you ship, the following KDEs should be linked to the traceability lot:
  - TLC
  - How much you shipped
  - What you shipped
  - Where you shipped it
  - Where you shipped it from
  - Date you shipped it
  - Traceability lot code source information
  - Reference document information
The Food Traceability Rule requires persons who manufacture, process, pack, or hold foods on the Food Traceability List (FTL) to maintain and provide to their supply chain partners specific information (key data elements or KDEs) for certain critical tracking events (CTEs) in the food's supply chain. This framework forms the foundation for effective and efficient tracing and clearly communicates the information that FDA needs to perform such tracing.

The information that firms must keep and send forward under the rule varies depending on the type of supply chain activities they perform with respect to an FTL food, from harvesting or production of the food through processing, distribution, and receipt at retail or other point of service. Central to the proposed requirements is the assignment, recording, and sharing of traceability lot codes for FTL foods, as well as linking these lot codes to other information identifying the foods as they move through the supply chain.

Graphics on the subsequent pages provide readers with a list of KDEs required for each CTE performed.
Records Maintenance and Availability

Legible original paper, electronic, or true copies. Stored to prevent deterioration or loss. May include electronic links.

Records must be kept for 2 years.

Available within 24 hours (or reasonable time if FDA agrees). May be stored offsite or by another entity.

During an outbreak - electronic sortable spreadsheet within 24 hours of a request (including a phone request).
Electronic Sortable Spreadsheet

- Upon request by FDA, firms must provide an electronic sortable spreadsheet containing the information you are required to maintain:
  - When necessary to help prevent or mitigate a foodborne illness outbreak;
  - Assist in the implementation of a recall;
  - Or otherwise address a threat to public health

- Must be made available to FDA within 24 hours or within a reasonable, agreed upon time

- The electronic sortable spreadsheet will assist FDA in analyzing traceability information quickly
Electronic Sortable Spreadsheet Example

This represents an electronic sortable spreadsheet generated by a distribution center when FDA requested records for all FTL foods received from 9/18/2020 through 9/23/2020.

<table>
<thead>
<tr>
<th>TLC</th>
<th>Quantity and UOM</th>
<th>Product Description</th>
<th>Immediate Previous Source Location Description*</th>
<th>Receiving Location Description*</th>
<th>Receive Date</th>
<th>TLC Source Location Description*/TLC Source Reference</th>
<th>Reference Document Type and Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>UPC:45645645604.BIU:B:12OCT2020</td>
<td>50 CASES</td>
<td>CHARLES CHEESE CO. BRAND FETA CHEESE 10 x 32 OZ CONTAINERS</td>
<td>Charles Cheese Co. Distro Foodservice DC #45</td>
<td>9/23/2020</td>
<td>FFN:456456</td>
<td>PO 111101</td>
<td></td>
</tr>
<tr>
<td>(01)1141114114140(10)FPP16-092520</td>
<td>100 CASES</td>
<td>FRESH PROCESSOR BRAND, CUT MANGOS, 12x1 LB BAGS</td>
<td>Fresh Processor Plant #16 Distro Foodservice DC #45</td>
<td>9/18/2020</td>
<td>11231 TLC Source, TLCville, MN, 55441</td>
<td>PO 456213</td>
<td></td>
</tr>
<tr>
<td>(01)1141114114140(10)FPP16-092420</td>
<td>50 CASES</td>
<td>FRESH PROCESSOR BRAND, CUT CANTALOUEDE, 12x1 LB BAGS</td>
<td>Fresh Processor Plant #16 Distro Foodservice DC #45</td>
<td>9/21/2020</td>
<td><a href="https://fda.gov/01/11411141141402/10/FPP16-092420">https://fda.gov/01/11411141141402/10/FPP16-092420</a></td>
<td>BOL 11491</td>
<td></td>
</tr>
<tr>
<td>(01)1141114114140(10)FPP16-092120</td>
<td>100 CASES</td>
<td>FRESH PROCESSOR BRAND, GARDEN SALAD KIT, 10x12 OZ BAGS</td>
<td>Fresh Processor Plant #16 Distro Foodservice DC #45</td>
<td>9/20/2020</td>
<td><a href="https://fda.gov/01/11411141141402/10/FPP16-092120">https://fda.gov/01/11411141141402/10/FPP16-092120</a></td>
<td>BOL 11401</td>
<td></td>
</tr>
<tr>
<td>(01)2232223222223222223222232.10.FFT2020-09-20</td>
<td>140 CASES</td>
<td>FreshFish BRAND, FROZEN YELLOWFIN TUNA STEAKS, 25 LB CASE</td>
<td>FreshFish Importer Inc. Distro Foodservice DC #45</td>
<td>9/22/2020</td>
<td><a href="https://fda.gov/01/2232223222223222223222232/10/FFT2020-09-20">https://fda.gov/01/2232223222223222223222232/10/FFT2020-09-20</a></td>
<td>BOL 22302</td>
<td></td>
</tr>
</tbody>
</table>

* See Master Data Spreadsheet for full location descriptions
Compliance date

January 20, 2026

- Applies to all firms
- Provides 3 years for covered entities to work with supply chain
- We will educate before and while we regulate
More to come

• Outreach, education, technical assistance
• Additional communications materials
• Development of system for sending required information to FDA
Implementation and Enforcement

• Currently considering best approach for conducting inspections under this rule

• Developing compliance strategy and plan to work with State, Local, Tribal, Territorial and other regulatory partners to enforce rule
What can industry do to get started?

1. Do you manufacture, process, pack or hold a food on the Food Traceability List?
2. Do any exemptions apply to your situation?
3. What Critical Tracking Events (CTEs) do you conduct?
4. What Key Data Elements (KDEs) do you already maintain? What additional KDEs do you need to maintain to be in compliance with the final rule?
5. Develop a traceability plan.
6. Talk with your supply chain partners.
   - Understand the record keeping practices in your supply chains
   - Determine how best to communicate required information
   - Discuss potential solutions
7. More resources available here.
Available Resources

- **Food Traceability Final Rule** *(Federal Register)*
  - Link directly to codified (Bookmark this!): [https://www.federalregister.gov/d/2022-24417/p-amd-1](https://www.federalregister.gov/d/2022-24417/p-amd-1)
  - CTRL + F

- **Food Traceability Final Rule** webpage
  - NEW translations!

- **Frequently Asked Questions** *(FAQs)*
  - NEW search feature!

- **Food Traceability Final Rule** Webinar

- Critical Tracking Events and Key Data Elements *document*

- Exemptions *tool*

- Food Traceability List *webpage*

- Risk Ranking Model Results *tool*
Available Resources (cont.)

- **Supply Chain Examples:**
  - Produce Supply Chain Example
    - [Video Presentation](#)
    - [Transcript](#)
    - [Slides](#)
  - Seafood Supply Chain Example
    - [Video Presentation](#)
    - [Transcript](#)
    - [Slides](#)
  - Cheese Supply Chain Example
    - [Video Presentation](#)
    - [Transcript](#)
    - [Slides](#)

- **Retail Food Establishments and Restaurants**
  - Retail Food Establishments (RFEs) and Restaurants: What Records Do I Need to Keep for the Food Traceability Rule?
  - Retail Food Establishments (RFEs) and Restaurants: What You Need to Know About the Food Traceability Rule
  - Retail Food Establishments (RFEs) and Restaurants: What You Need to Know About Establishing and Maintaining a Traceability Plan for the Food Traceability Rule

- **Questions?**
Thank you!
Traceability
A Nestlé Perspective

David Clifford
Director, Food Safety Nestlé USA

May 2023
A Shakespearean comedy?

*Is this thing we seek worth the cost*
Nestle is leading in a highly competitive market
Nestlé US brands are in 97% of households
... but with only 3.2%* of global market

*Based on Euromonitor data including Hot Beverages ($162bn), Soft Drinks ($593bn) and Packaged Food ($2589bn) categories

![Pie chart showing Nestlé's market share](chart.png)

- Nestlé: 3.2%
- Other >10 CHF bn: 16.3%
- Global market: 80.5%
Food Supply Chain

We aim to have true farm to fork traceability, but the reality is...we achieve one up and one down....
In addition to GFSI, qualification includes detailed assessment which is linked to raw material intrinsic risk + Nestlé factory usage.

Annual verification maintained through GFSI as well as remote and/or on-site assessments as required through local risk assessment.

Vendor performance / Partnership – Performance drives verification activities and frequency of assessments.
Traceability enabled by Technology

Supplier are our partners in leveraging technology as an aid to improve food safety, quality consistency and transparency...

- SAP used in combination with other digital systems
- Nestlé IS/IT infrastructure enables global view
- Vendor batch code, material number and Nestlé batch codes used to trace
- Data transferred from manufacturing to Nestlé DC’s and WH’s
- Currently no electronic data transfer to customers
Traceability in SAP/Nestle

Material receipt and storage

1. Material arrives at receiving dock with a vendor tag

2. New pallet tag created/placed on material. Material assigned Nestlé batch code based on vendor manu date and PO

- Certificate of Analysis
- Bill of Lading
- Nestlé receipt check sheet

- Every physical storage location is barcoded
- As material travels throughout factory new location/usage reflected in SAP
Traceability in SAP/Nestle

Material usage and finished product

- Minor ingredients may be handled at central location
- Individual ingredients combined into a mixed pallet
- Mixed pallet receives a new pallet tag
- Mixed pallet brought to line; scanned into use

- All finished products given a new independent pallet tag
- All shipments are tracked in SAP
Traceability in SAP/Nestle

SAP enables visibility for usage analysis

Bottom-Up Analysis

When a RM batch is entered this transaction will display:
- the FG the material was consumed in
- where the FG was shipped

Top-Down Analysis

When a FG batch is entered this transaction will display:
- Each RM and batch information that was consumed into the recipe/batch

Display Batch Where-Used List

<table>
<thead>
<tr>
<th>Material</th>
<th>Batch</th>
<th>Plant</th>
<th>Plant in part</th>
<th>SH</th>
<th>Item</th>
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</thead>
<tbody>
<tr>
<td>Nestle</td>
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<td>1</td>
<td>10</td>
<td>1</td>
</tr>
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</table>
Traceability in SAP/Nestle

SAP…awesome yet not a complete solution itself

- Poor quality and inconsistent data from vendors
  - We generate our own...
  - No vendor ERP
  - Brokers

- Contract Manufacturing (virtual factory, etc)
  - >85 locations
  - Multitude of systems/platforms

- Acquired business integration
  - 2-3yr integration path
  - Costly
  - Resource intense

Ex.
- 3 company names
- 2 item numbers
- 3 batch identifiers
US FDA Traceability final rule

What it means and impacts

- A list of ‘high risk’ foods subject to additional* traceability requirements
- Establishes recordkeeping requirements for ‘critical tracking events’ (CTEs)
- Identifies ‘key data elements’ (KDEs) necessary

*beyond the one up/one back requirements under the Bioterrorism act
US FDA Traceability final rule

Nestlé TRACEABILITY WORKSHOP (the who what when where how)

- Understand final rule and current practices
- Internal Case Studies to explore gaps
- Action register for compliance

- On site at pilot factory
- 1.5 days (half day process walk through; full day gap assessment)

- STAKEHOLDERS – Legal (internal and external support), Regulatory, Quality and Food Safety Mgmt, Digital, Crisis Mgmt, QM Vendor Mgmt, Supply Chain/Logistics, Applications Group (Product Development), InterMarket Supply, Commercial Planning

<table>
<thead>
<tr>
<th>Activity</th>
<th>Duration</th>
<th>Responsible</th>
</tr>
</thead>
<tbody>
<tr>
<td>Review of Final Rule</td>
<td>1.5hr</td>
<td>Legal team</td>
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<tr>
<td>Overview current practices</td>
<td>1hr</td>
<td>Factory (2) QM</td>
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<tr>
<td>Case Studies</td>
<td>3.5hr</td>
<td>Legal team</td>
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<tr>
<td>Actions/Gaps</td>
<td>1hr</td>
<td>Corp QM</td>
</tr>
</tbody>
</table>
US FDA Traceability final rule

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Pre-Work

- Materials in scope of final rule
- Materials in scope of workshop/case study
  - Breaded/Frozen not fully cooked fish material
  - Cut/Fresh/Chilled Onion

- Supportive data/information
  - BOL
  - Inspection plan criteria
  - COA
  - SAP transactions
  - Vendor information
  - Shipping records (FG)

[Link: FDA Food Exemption Tool]
US FDA Traceability final rule

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Workshop details

- Case Study and Gap assessment
  1. Identify Critical Tracking Events
  2. Analyze records/transactions vs final rule requirements

- Supportive data/information
  - Material flows (intermediary movement)
  - Material lot code definition
  - Process flows
  - Unit operations definitions
  - Procedural (SAP) transactions
  - Finished Goods formation/coding
  - What defines a ‘lot’ or ‘batch’
  - Shipping records (intermediary movement)
US FDA Traceability final rule

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  - Shipping records (intermediary movement)

When compared to requirements:
- Is the information available today?
- What form (written/digital)?
- Where is that information found/stored?
- Ease of accessibility?
- Ease to assemble or collate in 24hrs?
- If digital, backup routine?
US FDA Traceability final rule

Nestlé TRACEABILITY WORKSHOP (the who what when where how)

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Workshop details

- Case Study ➔ Gap assessment
  1. Identify Critical Tracking Events
  2. Analyze records/transactions vs final rule requirements
  3. Identify gaps in information
  4. Consider digital solutions…

- To resolve-
  - Immediate previous source
  - Traceability lot code source reference
  - Internal Traceability Plan Policy/Standard
    - Structure of program/RACI
    - Sites without SAP
US FDA Traceability final rule

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  1. Identify Critical Tracking Events
  2. Analyze records/transactions vs final rule requirements
  3. Identify gaps in information
  4. Consider digital solutions…

• To resolve-
  • Immediate previous source
  • Traceability lot code source reference
  • Internal Traceability Plan Policy/Standard
    • Structure of program/RACI
    • Sites without SAP

• For further work
  • Comprehensive review of shipping activities
    • Cross-Docking activities
    • Intermediate ship points
  • Stakeholder management plan
    • Ghost kitchens (commercial team)
    • Application Groups (MOC)
    • R&D
    • Foreign Affiliates
    • Vendors
    • Procurement
    • Contract Manufacturing
    • DCs (internal and 3rd party)
Retailer Perspective on Traceability Requirements

Enhancing tracking and tracing of food and recordkeeping

Food Safety Summit
May 9, 2023

K.M. O’Donnell
Wegmans Food Markets, Inc.
Wegmans since 1916

55,000 Employees
110 Stores
States 8 (DC)
“Helping Customers Live Healthier Better Lives through Exceptional Food.”
In Addition to the Stores

- 3 Manufacturing Facilities
- 2 Distribution Campuses
- Organic Farm and Orchard
- Restaurant
What We Believe

• At Wegmans, we believe that good people, working toward a common goal, can accomplish anything they set out to do.

• In this spirit, **we set our goal to be the very best at serving the needs of our customers.** Every action we take should be made with our customers in mind.

• To our CUSTOMERS and our PEOPLE we pledge [continuous improvement](#), and we make the commitment: “Every Day You Get Our Best”
Customer Trust

It is all about **TRUST** and **CONFIDENCE**

- We work, each and every day, to build and maintain the trust of our customers
- Traceability is a pillar of trust
Critical Tracking Events (CTEs)
Points in the supply chain where product is moved, sold, or created

• Harvest of a raw agricultural commodity (RAC)
• Cooling of a RAC
• Initial packing of a RAC
• First land-based receiver of a food obtained from a fishing vessel
• Shipping
• Receiving
• Transformation
Current Status

• Wegmans Brand product and ingredient suppliers are certified to one of the GFSI benchmarked standards
• Follow the traceability required in the Bioterrorism regulations
• No difference in product treatment
• Products received by/at Wegmans in multiple manners
How do we receive product?

- Through our distribution facilities
- Cross Docked
- Direct Store Delivery (DSD)
Vendor Product Identification

• Wegmans require that you identify your products with UPC barcodes (also known as EAN/UPC Symbols) that can be scanned at point of sale.

• Your UPC barcode symbols must include a valid Global Trade Item Number® (GTIN®)

www.gs1us.org
Cross Dock/Quick Response

• Cross dock pallets are built store-ready by our Supplier
• Pallets are destined and labeled for a specific Store
• Entire pallet of one or more items (rainbow pallet) flowing through the DC and being merged in whole with an outbound truck for Store Delivery
• **No** case handling is required at the DC
Challenges

• Scope of Food Traceability List
• Systems Interoperability and Standardization
• Mixed pallets/split pallets
• Operational practices vs rule requirements
• Direct Store Deliveries (DSD)
• Kill step exemption – documentation
<table>
<thead>
<tr>
<th>Food Traceability List (FTL)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cheeses other than hard cheeses</td>
</tr>
<tr>
<td>Shell Eggs (chicken)</td>
</tr>
<tr>
<td>Nut Butter</td>
</tr>
<tr>
<td>Cucumbers (fresh)</td>
</tr>
<tr>
<td>Herbs (fresh)</td>
</tr>
<tr>
<td>Leafy Greens, including fresh-cut leafy greens (fresh)</td>
</tr>
<tr>
<td>Melons (fresh)</td>
</tr>
<tr>
<td>Peppers (fresh)</td>
</tr>
</tbody>
</table>
Potential Next Steps

• Review the Final Rule and resources
  Interdepartmental team including Leadership, IT, Supply chain, Logistics, Regulatory, FSQA

• Assess Current Operations and records
  Inventory management systems

• Engage Suppliers and others in the Supply Chain
  Evaluate records captured, can they be shared?

• Determine gaps in current system and rule requirements

• Create a Traceability Plan

• Implement plan and capture records
Thank You
Traceability programs – where to start?
Resources and discussion

Tim Jackson, Ph.D.
Senior Science Advisor – FDA

Mahipal Kunduru, Ph.D.
Vice President, Quality – Topco

2023 Food Safety Summit – Chicago IL – May 8-11, 2023
FDA’s New Era of Food Safety

1. Develop Foundational Components
2. Encourage and Incentivize Industry Adoption of New Technologies
3. Leveraging the Digital Transformation

People-led, FSMA-based, Technology-enabled.
Core Element 1
Objectives

- Advance food traceability fundamentals as FDA transitions from a proposed to final Food Traceability Rule, as required by FSMA Section 204.
- Work with international regulatory partners to create a common global, harmonized food traceability language based on harmonized data elements and standards.
- Champion Low- or No-Cost Food Traceability to incentivize development of tech-enabled solutions for food producers of all sizes.
- Develop and pilot prototype to allow FDA to receive traceability data in digital form that can be used to create outbreak investigation diagrams and improve outbreak response.
Meet the Winners of FDA’s Low- or No-Cost Food Traceability Challenge

- Low- or No-Cost Tech-Enabled traceability challenge
- Launched June 1, 2021
- 90 submissions from 14 countries
- 12 winners announced Sep 2021
- Teams from US Canada New Zealand
- Solutions include:
  - Downloadable software,
  - Mobile apps,
  - Block chain technologies
  - Open data networks,
  - IoT technologies,
  - Machine learning
What is Traceability?
Traceability is the ability to track a product through its supply chain including its creation, transformation(s), depletion, and locations.

Why Traceability?
Traceability has many use cases including food safety, fraud prevention, supply chain management efficiency, ESG initiatives.

How to Implement
Make your own traceability plan, get sector specific guidance, and more with GFTC’s tools, training, and customized services.
Implementing a traceability program

• Map current state
  • Inventory of raw materials, suppliers and supplier facilities
  • Products and manufacturing facilities
  • Customers or downstream receivers

• Determine objectives of program and available resources

• Map process and determine critical tracking events (CTE) and key data elements at each step (KDE)

• Determine gaps in internal and partner systems

• Select solution for data management and communication

• Create and implement traceability plan
  • Conduct pilot(s)
Apply unique global identifiers
- Product
- Location
- Party
- Logistic units
Questions?