

Dear Wakefern Supplier:

As a trusted supplier, we value your shared commitment to ensuring the safety of the food and products we sell and complying with government regulations enacted to improve our food system. In 2011, Congress passed the Food Safety Modernization Act (FSMA), which shifts the regulatory focus from response to foodborne illness to prevention. We also know that food borne illness has the potential to forever impact lives – and cause lasting damage to the reputation of manufacturing and retail companies.

As with all government regulations, Wakefern is committed to fully complying with the FDA's new Food Traceability Rule's recordkeeping requirements, and we ask for your partnership as we work to comply with the mandated changes for suppliers that manufacture, process, pack, or hold foods included on the Food Traceability List (FTL).

Compliance with Section 204(d) (FSMA 204) of the law will now require the addition of a traceability lot code and traceability lot code source as required data fields for all items on the FTL. Suppliers who provide food products on the FTL are also required to provide the Key Data Elements (KDE) as defined by the regulation with each shipment of FTL products. Suppliers shipping foods that are, or contain, an ingredient on the FTL are required to be in full compliance with the law by **January 20, 2026**.

While these changes may present challenges, we also value the opportunity to improve food safety and look forward to collaborating with you to ensure this is a smooth transition.

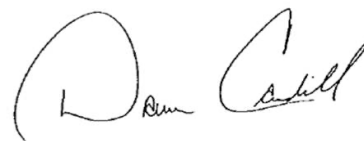
Attached please find information to assist you during this transition, including a timeline to provide the required KDEs for each covered product shipped to Wakefern by **July 31, 2025**. Specific requirements as to how KDEs must be communicated are contained within "Attachment 1" and "FSMA 204;" information and links can be found in "Attachment 2," including an important section entitled "Getting Started with the Food Traceability Rule."

We thank you in advance for ensuring your company's commitment to meeting the requirements of FSMA 204. Please know that we value your partnership and look forward to our continued work together.

Sincerely,

A handwritten signature in black ink that reads "Mike Stigers".

Mike Stigers
President

A handwritten signature in black ink that reads "Darren Caudill".

Darren Caudill
Chief Sales Officer

ATTACHMENT 1

To comply with the FSMA 204 the defined KDEs must be received from each vendor by **July 31, 2025**, as well as compliance with the specific requirements outlined in the following pages. This will provide time for both Wakefern and our suppliers to make any necessary adjustments in order to be fully compliant by the January 20, 2026 compliance date.

- Specific requirements covering five main areas pertaining to how the KDEs must be communicated are reflected below. These areas include:
- EDI 856 ASN Specification
- Bills of Lading Specification
- Pallet Label Requirements
- Case Label Requirements
- Required GDSN Attributes through Data Synchronization

Failure to provide the information required by the FSMA 204 may result in fines or penalties from regulatory agencies due to non-compliance. If you need assistance in implementing systems to meet these requirements please to refer to the GS1 Supply Chain Regulation and Compliance Standards for additional information and guidance: <https://www.gs1us.org/supply-chain/standards-and-regulations/food-safety-modernization-act>. Additionally, as always, you can always reach out to Wakefern for additional support at traceability@wakefern.com.

An additional communication will follow shortly asking vendors to provide the status of their items subject to this regulation.

EDI 856 ASN Requirements

For all shipments, specifically for products on the FTL, provide Traceability Lot Code and Traceability Lot Code Source in the EDI 856 Advanced Ship Notice (EDI 856) and on the Bill of Lading. This updated information on the EDI 856 will ensure smooth operations and minimize data entry errors.

If you are currently not sending an EDI 856 and/or not sending an EDI 856 with the Traceability Lot Code, the Traceability Lot Code Source, plus other required KDEs, you need to begin sending this immediately and providing that same information on the Bill of Lading. If you do not currently have this capability, you need to address this with your technology group and advise Wakefern when you will be in compliance.

Field Name	Description	EDI Segment	KDE Number
Purchase Order Number	Wakefern Purchase Order Number	Order Level, PRF01	4
Shipment Date	Actual Shipment Date	Shipment Level, DTM02	3

Ship-From GLN Address Phone Number	Physical Location where product was shipped from	Shipment Level N104 N301, N401-N404 PER01-PER04	2
Ship-To	Physical Location where product was shipped to	Shipment Level	1
Pallet ID	SSCC for pallet	Tare Level, MAN	
Product Description	Short description of food on pallet	Item level, PID05	5
Item Identification (Case GTIN) Case Lot	Traceability Lot Code of food on pallet. Wakefern' GTIN-14 required for Wakefern specified products. Commodity items such as bulk apples may use supplier's GTIN-14.	Pack or Item Level, LIN02, LIN04	7
Manufacturing Plant GLN Address Phone Number	Traceability Lot Code Source Reference of food on Pallet	Pack or Item Level N104 N301, N401-N404 PER01-PER04	8
Date Code(s)	Expiration Date, Production Date, Packaging Date, Best Before Date, Harvest Date	Pack or Item Level, DTM01, DTM02	
Ship Quantity Ship UOM	Number of cases of food on pallet	Pack or Item Level, SN102,SN103	6

Bills Of Lading

Bills of Lading (BOLs) must accompany each delivery. BOLs must include the following information:

- Purchase Order and Order Date
- Physical Ship-From and Ship-To Locations, including address and contact phone number
- Shipment Date

- Product Description including either Wakefern or Supplier product identifier
- Quantity Ordered, Quantity Shipped, Unit of Measure
- For each FTL Food shipped, provide Traceability Lot Code and Traceability Lot Code Source in addition to the EDI 856 Advanced Ship Notice communication.

Pallet Label

Wakefern utilizes GS1 US Serial Shipping Container Code (SSCC) to identify a logistic unit. A logistic unit can be any combination of units put together or transport and/or storage where the specific unit load needs to be managed throughout the supply chain. Examples of logistics units are pallets or air cargo containers. SSCC barcode acts as a license plate number to track a shipment of logistic units through the supply chain.



SSCC Pallet Label

Data Element Requirements:

- GS1-128 or Data Matrix SSCC Barcode

Physical Requirements:

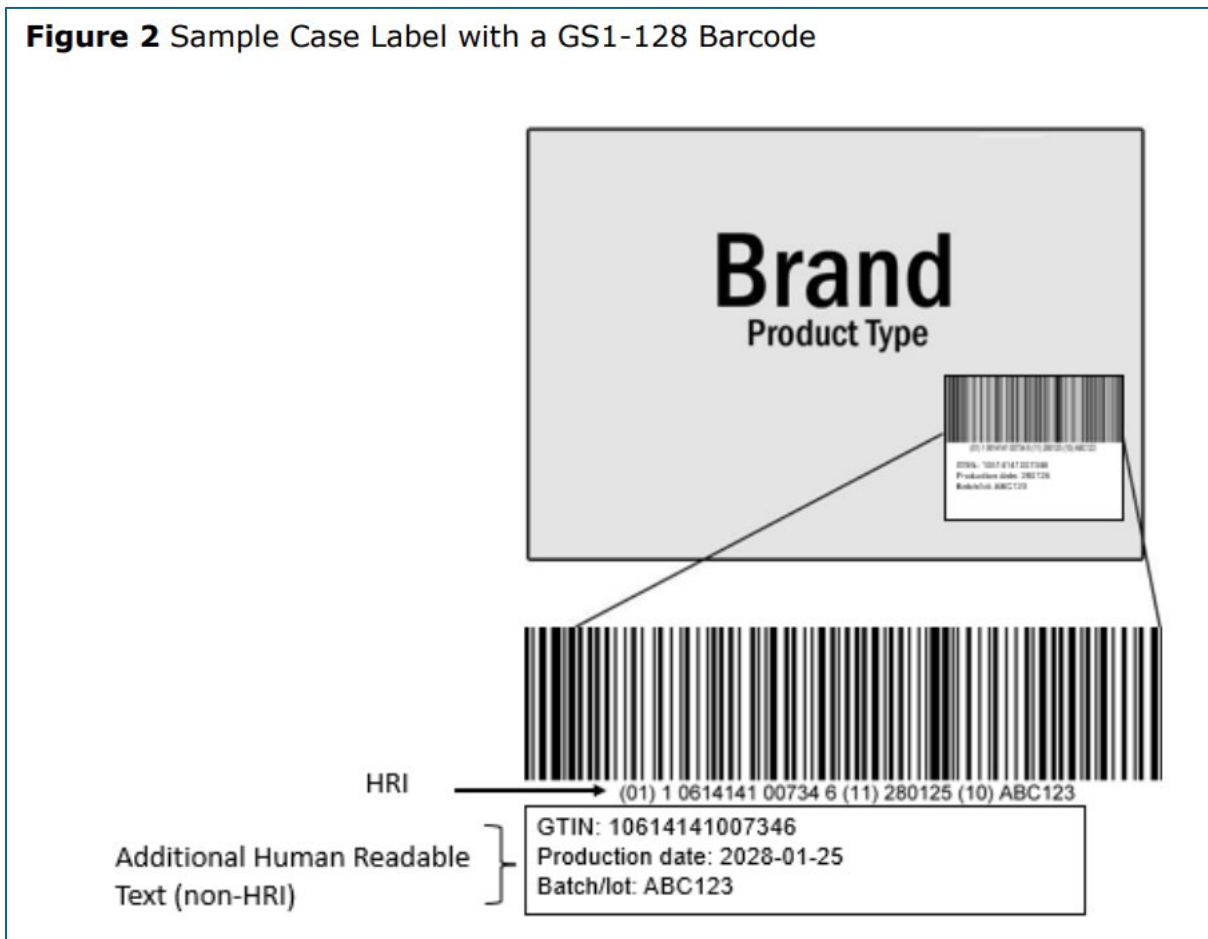
- SSCC barcode on each pallet in the shipment must correspond to the pallet contents and destination reflected in the ASN. [GS1 US Specifications](#)
- The label must be placed on the inside of the shrink-wrap attached to one of the cases.
- The label must be temperature sensitive (to prevent smearing in freezing conditions).
- Each pallet should have at least one barcode. It is recommended, however, that a pallet should contain multiple identical SSCC barcodes. This is especially helpful when the pallet is turned sideways in the truck or on the rack in the warehouse.
- Pallets with multiple lot codes should be labeled, "Mixed Pallet".

- When pallets are stacked, they should be considered independent logistic units, each pallet should be identified with a unique SSCC.

Case Label

Fixed Weight Case Label Requirement

Figure 2 Sample Case Label with a GS1-128 Barcode



North American Industry Guidance for Standard Case Code Labeling

Data Element Requirements:

- Packer/Processor Address and Phone
- Global Trade Item Number or GTIN-14 (AI 01). For Wakefern-defined products, this should be the Wakefern GTIN-14. For bulk commodity ingredients (e.g., apples) this should be supplier's GTIN-14.
- Product Name & Description
- Lot Number (AI 10)
- Product Date (production date (AI 11), pack date (AI 13), expiration date (AI 17), best before date (AI 15), or sell by date (AI 16)). Could be a combination of these dates as well.

- Quantity
- Unit of Measure

Physical Requirements:

- Use 2D GS1 Data Matrix barcode or GS1 128 barcode symbology.
- The label must be temperature sensitive (to prevent smearing in freezing conditions).

Variable Weight Case Label



GS1 Data Matrix

GTIN: (01) 01234567890128

Exp Dt: (17) 210221 {YYMMDD}

Net Wt. Lbs.: (3202) 050000 {500.00}

Batch/Lot: (10) ABCD1234

Serial No.: (21) 7654

Data Element Requirements:

- Packer/Processor Address and Phone
- Global Trade Item Number or GTIN-14 (AI 01). For Wakefern-defined products, this should be the Wakefern GTIN-14. For bulk commodity ingredients (e.g., apples) this should be supplier's GTIN-14.
- Product Name & Description
- Lot Number (AI 10)
- Serial Number (AI 21) where applicable
- Product Date (production date (AI 11), pack date (AI 13), expiration date (AI 17), best before date (AI 15), sell by date (AI 16))
- Net Weight in lbs. (AI 320n). n = number of decimals

Physical Requirements:

- Use 2D GS1 Data Matrix barcode symbology. GS1-128 Barcodes are limited to 48 characters which prevents inclusion of all data elements required for variable weight cases.

- The label must be temperature sensitive (to prevent smearing in freezing conditions).

Data Synchronization Requirements

Publications for items on the FTL received through the Global Data Synchronization Network (GDSN) must include the new attributes identified by GS1 and adopted by the Standards Community to support the FSMA204 Regulation.

GDSN Required Attributes with Expected Responses:

- regulationTypeCode = TRACEABILITY_REGULATION
- regulatoryAct = FSMA04
- regulatoryAgency = FDA
- regulationComplianceIndicator = TRUE or NOT_APPLICABLE
- regulationRestrictionsandDescriptors = KILL_STEP_APPLIED or NOT_COVERED_BY_FTL

For a full list of Data Sync requirements and our Implementation Guide, please visit our 1WorldSync Landing Page at this link: [Wakefern | 1WorldSync](#)

ATTACHMENT 2

What is the “FSMA 204 Food Traceability Rule?”

Source: [FDA FSMA Traceability Rule \(fda.gov\)](https://www.fda.gov/food/food-traceability-rule)

The Food Safety Modernization Act (FSMA) Final Rule on Requirements for Additional Traceability Records for Certain Foods establishes traceability recordkeeping requirements beyond those in existing regulations. It applies to persons who manufacture, process, pack, or hold foods included on the Food Traceability List (FTL). The new requirements identified in the final rule will allow for faster identification and rapid removal of potentially contaminated food from the market, resulting in fewer foodborne illnesses and/or deaths.

At the core of this rule is a requirement that persons subject to the rule who manufacture, process, pack, or hold foods on the FTL, maintain records containing Key Data Elements (KDEs) associated with specific Critical Tracking Events (CTEs); and provide information to the FDA within 24 hours or within some reasonable time to which the FDA has agreed.

Compliance Date

Because the Food Traceability Final Rule requires entities to share information with other entities in their supply chain, the most effective and efficient way to implement the rule is to have all persons subject to the requirements come into compliance by the same date. The compliance date for all persons subject to the recordkeeping requirements is Tuesday, January 20, 2026.

Getting Started with the Food Traceability Rule

If you are uncertain about whether the Food Traceability Rule applies to your business or food, or if you know the rule applies and you’re not sure what to do next, the *Getting Started* links below will help. You may already be fulfilling some of the rule’s requirements such as Critical Tracking Events (CTEs), maintaining Key Data Elements (KDEs), and a traceability plan.

- Do you manufacture, process, pack or hold a food on the [Food Traceability List](#)?
- Do [any exemptions apply](#) to your situation?
- What [Critical Tracking Events \(CTEs\)](#) do you conduct?
- What [Key Data Elements \(KDEs\)](#) do you already maintain? What additional KDEs do you need to maintain to comply with the final rule?
- Develop your [traceability plan](#).
- Talk with your supply chain partners.
 - How can you work together to meet the requirements of the rule? It is helpful to understand your recordkeeping systems and those of your partners in the supply chain so you can determine the best way to communicate traceability information and discuss potential solutions.

FSMA 204 Shipping Critical Tracking Event

Source: <https://www.ecfr.gov/current/title-21/section-1.1340>

§ 1.1340 What records must I keep and provide when I ship a food on the Food Traceability List?

- a. For each traceability lot of a food on the Food Traceability List you ship, you must maintain records containing the following information and linking this information to the traceability lot:
 1. The traceability lot code for the food;
 2. The quantity and unit of measure of the food (e.g., 6 cases, 25 reusable plastic containers, 100 tanks, 200 pounds);
 3. The product description for the food;
 4. The location description for the immediate subsequent recipient (other than a transporter) of the food;
 5. The location description for the location from which you shipped the food;
 6. The date you shipped the food;
 7. The location description for the traceability lot code source, or the traceability lot code source reference; and
 8. The reference document type and reference document number.
- b. **You must provide** (in electronic, paper, or other written form) the information in paragraphs (a)(1) through (7) of this section to the immediate subsequent recipient (other than a transporter) of each traceability lot that you ship.

Definitions

Source: <https://www.ecfr.gov/current/title-21/chapter-I/subchapter-A/part-1/subpart-S#1.1310>

Location description means key contact information for the location where a food is handled, specifically the business name, phone number, physical location address (or geographic coordinates), and city, State, and zip code for domestic locations and comparable information for foreign locations, including country.

Product description means a description of a food product and includes the product name (including, if applicable, the brand name, commodity, and variety), packaging size, and packaging style. For seafood, the product name may include the species and/or acceptable market name.

Reference document means a business transaction document, record, or message, in electronic or paper form, that may contain some or all of the key data elements for a critical tracking event in the supply chain of a food. A reference document may be established by you or obtained from another person. Reference document types may include, but are not limited to, bills of lading, purchase orders, advance shipping notices, work orders, invoices, database records, batch logs, production logs, field tags, catch certificates, and receipts.

Reference document means the identification number assigned to a specific reference document.

Shipping means an event in a food's supply chain in which a food is arranged for transport (e.g., by truck or ship) from one location to another location. Shipping does not include the sale or shipment of a food directly to a consumer or the donation of surplus food. Shipping includes sending an intracompany shipment of food from one location at a particular street address of a firm to another location at a different street address of the firm.

Traceability lot means a batch or lot of food that has been initially packed (for raw agricultural commodities other than food obtained from a fishing vessel), received by the first land-based receiver (for food obtained from a fishing vessel), or transformed.

Traceability lot code means a descriptor, often alphanumeric, used to uniquely identify a traceability lot within the records of the traceability lot code source.

Traceability lot code source means the place where a food was assigned a traceability lot code.

Traceability lot code source reference means an alternative method for providing FDA with access to the location description for the traceability lot code source as required under this subpart. Examples of a traceability lot code source reference include, but are not limited to, the FDA Food Facility Registration Number for the traceability lot code source or a web address that provides FDA with the location description for the traceability lot code source.