



January 27, 2025

Re: Associated Wholesale Grocers, Inc. Food Traceability Requirements

Dear Valued Vendor Partner,

Associated Wholesale Grocers (“AWG”) has been working to understand and implement the U.S. Food and Drug Administration’s (FDA) final rule implementing Section 204 for the FDA Food Safety Modernization Act (FSMA), “Requirements for Additional Traceability Records for Certain Foods” (the “Traceability Rule”). As you are aware, the Traceability Rule is aimed at improving the efficiency of traceback investigations and recalls by requiring persons who manufacture, process, pack, or hold certain foods to maintain and provide through the supply chain certain information about those foods known as Key Data Elements (KDEs).

Achieving traceability is a major endeavor, and collaboration and coordination are needed to ensure the required information can be transferred and stored across our recordkeeping systems. As a valued vendor partner, **AWG needs you to take the following steps** to ensure we meet the electronic compatibility requirements with your company:

(a) Adhere to AWG’s EDI 856 ASN guideline – document can be found in [AWG’s Vendor Partner Policy Manual](#) and is attached for your reference, Attachment A.

(b) Transmit an EDI 856 ASN document for every shipment of products to any AWG facilities.

(c) Align your logistic unit requirements to match Attachment B: AWG Inbound Product and Pallet Standards

(d) Certify palletized barcode labels on the physical products arriving at the receiving dock correspond to the EDI 856 ASN data transmission.

(e) Update your AWG items’ FSMA 204 indicator in the **AWG Partner Gateway**. An item’s FSMA 204 status is required for ALL food items.

(f) Publish the FSMA 204 settings to AWG through a GDSN data pool (e.g., 1WorldSync or Syndigo).

AWG acknowledges the FDA guidance, the Final Rule, titled “Requirements for Additional Traceability Records for Certain Foods” published on November 21, 2022. AWG is requiring you to take the above actions even if the items you supply are not on the FDA’s Food Traceability List.

AWG is collaborating with iFoodDS to gather and store the necessary KDEs. They may contact you in the coming weeks to assist in setting up an account for directly capturing your KDEs. Vendors have the option to work with iFoodDS, Edict, or iTrade to manage the transmission of the EDI 856 to AWG along with the required KDEs.

By taking these steps, AWG believes we are taking the appropriate actions to ensure both our companies will satisfy the FDA's Final Rule requirements. To be FDA compliant by Tuesday, January 20, 2026, AWG is requiring that all vendor partners agree to these alignment steps (a), (b), (c), and (d) above and complete transition by Sunday, March 30, 2025.

**Non-compliance with FSMA 204 could result in enforcement actions from the FDA.** Additionally, AWG may levy significant penalties for insufficient traceability information, in order to gain compliance with the FDA mandate. **Repeat instances may cause AWG to review its relationship with vendor partners who routinely fail to comply with these FDA mandated traceability requirements.**

Thank you for your continued partnership to protect the customers we serve every day! Please contact [fsqa@awginc.com](mailto:fsqa@awginc.com) with any questions.

Best Regards,



Tye Anthony  
Chief Merchandising & Marketing Officer



Richard Kearns  
EVP Distribution & Logistics

Attachments:

- (a) AWG Advance Ship Notice EDI
- (b) AWG Inbound Product and Pallet Standards
- (c) AWG Partner Gateway FSMA 204 Indicator Update
- (d) Publishing item information through a GDSN data pool