



**Take control: Don't let your customers
force you to do traceability their way.**

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ACHESONGROUP.COM

Today's speakers

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The Acheson Group (TAG)



- Epidemiologist and Foodborne Outbreak Investigation
- Led State of MN Human and Animal Food Regulatory Programs
- Served on the FDA's IFT Task Order 6 - Pilot Projects for Improving Product Tracing along the Food Supply System
- Ph.D. Thesis - The use of critical tracking events and key data elements to improve the traceability of food throughout the supply chain to reduce the burden of foodborne illnesses
- Working closely with the industry to understand and implement the Traceability Rule

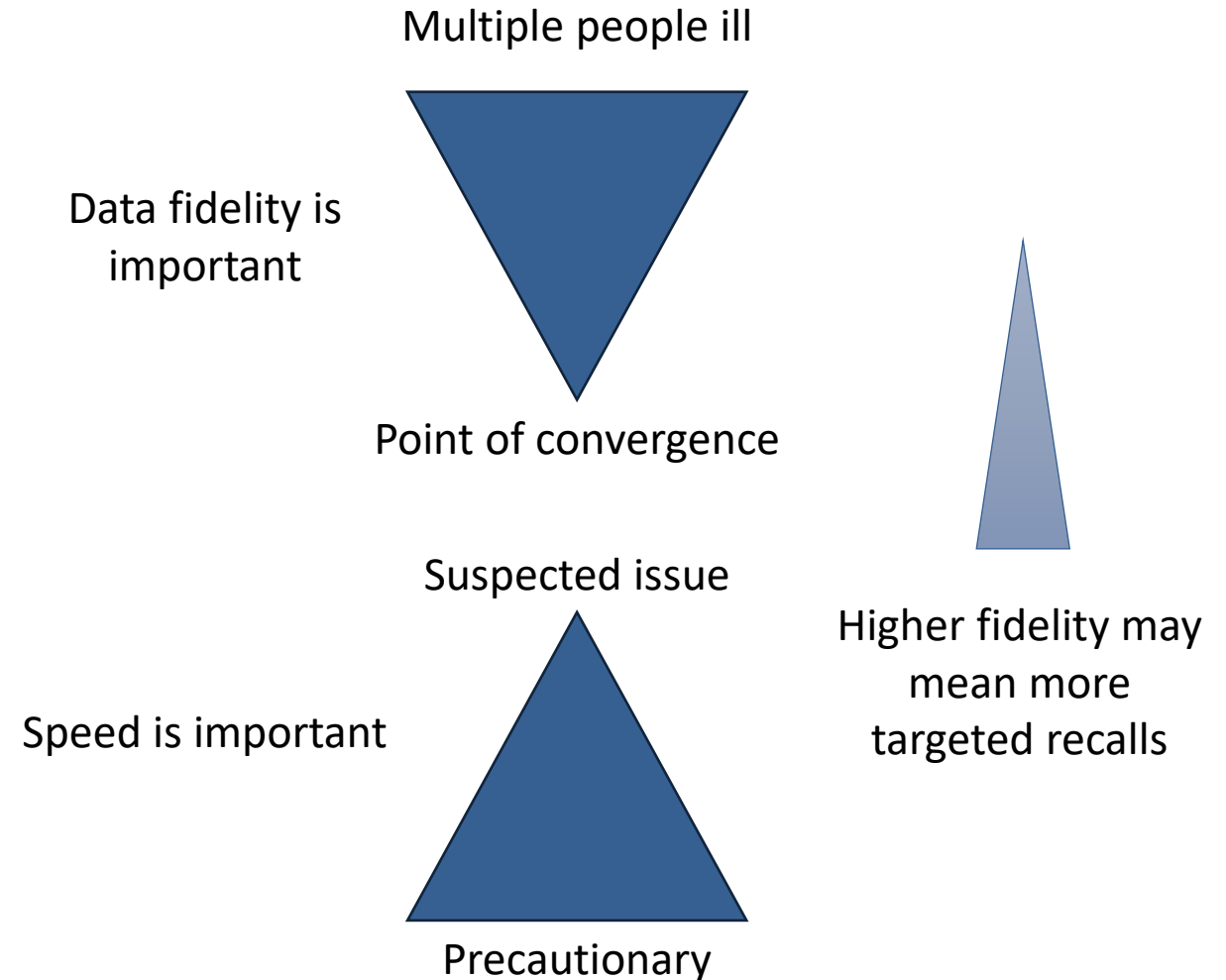
Today's Topics

- Almost everyone in the supply chain is a “customer” = Receiving CTE / KDEs
- Your customers will ask for different information in different formats AND your suppliers will provide you with information in different formats
- Labels alone can't be the answer

Why are we talking about traceability?

Traceability = Investigation

Recall = Corrective Action



Why are we talking about traceability?

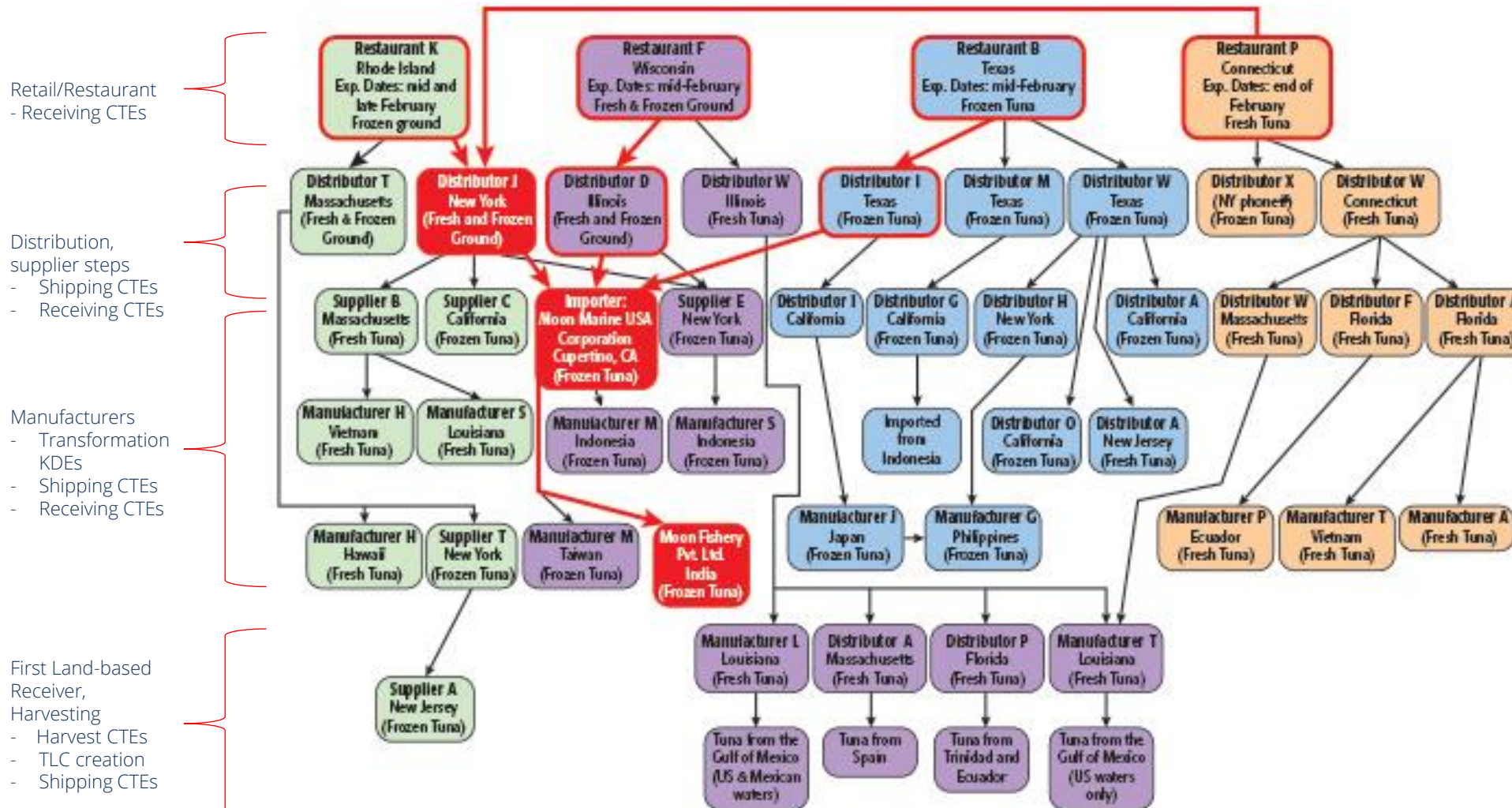
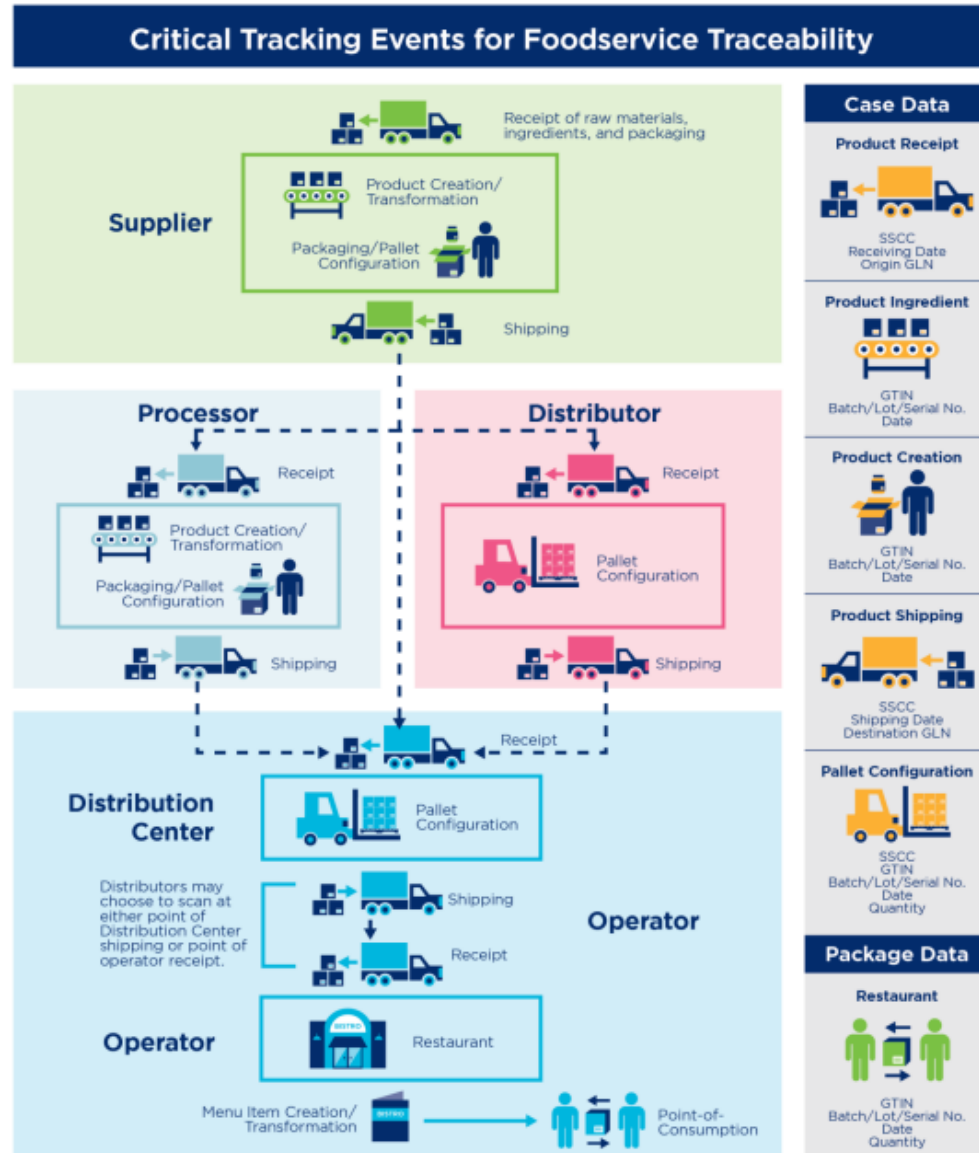


Figure 2: Salmonella Bareilly Traceback (The distribution of the contaminated tuna is outlined in red.)

Isn't the industry already good at recalling product?



- Yes, but...we don't need to track things at the case level for recalls.
- The supply chain is DESIGNED to move in one-direction – FORWARD!
- The goal of FSMA 204 is to ensure more consistent collection of data to enable faster, more precise tracebacks.

Data complexity of shipping and receiving

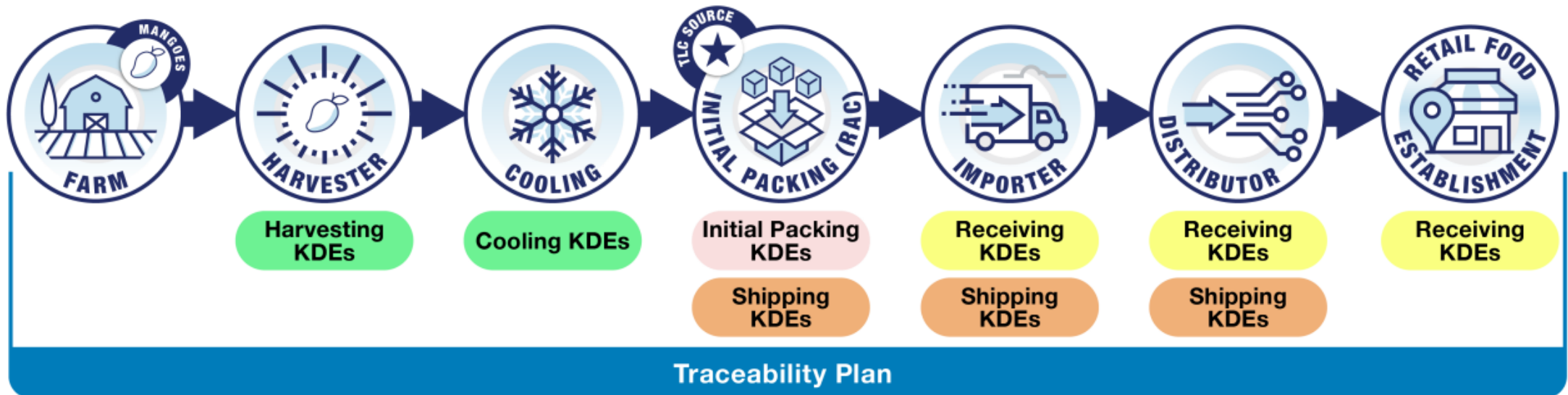
- Can you generate your own shipping KDEs and create a formatted record that can be saved for 24 months and easily retrieved on demand? If not, you aren't ready for FSMA 204.
- If you have dozens or hundreds of customers, what will you do if most of them ask you to share traceability data through a proprietary system or portal? How will you manage this level of complexity across a myriad of customer systems?

Data complexity of shipping and receiving

Supply Chain Example: Imported Mangoes (Importer holds the food)



In this scenario, the importer/wholesaler is importing fresh mangos. The importer takes physical possession of the mangos they are importing, so they are covered by the rule, and must maintain receiving and shipping KDEs. All entities in blue are covered by the final rule and must maintain a Traceability Plan, in addition to the KDEs.



Shipping and Receiving KDEs

Shipping KDEs	Receiving KDEs
Traceability lot code for the food	Traceability lot code for the food
Quantity and unit of measure of the food	Quantity and unit of measure of the food
Product description for the food	Product description for the food
Location description for the immediate subsequent recipient (other than a transporter) of the food	Location description for the immediate previous source (other than a transporter) for the food
Location description for the location from which you shipped the food	Location description for where the food was received
Date you shipped the food	Date you received the food
Location description for the traceability lot code source or the traceability lot code source reference	Location description for the traceability lot code source or the traceability lot code source reference
Reference document type and reference document number (maintain only)	Reference document type and reference document number

Challenges for Implementation

- Case-level traceability (traceability lot codes)
- Change in operations
- Data management systems
- Data standards
- Error rates
- Do you trace everything, not just FTL foods?
- Not "just" a food safety problem – requires a multidisciplinary approach
 - FSQA, IT, Supply Chain, Logistics, etc.

Challenges for Implementation

Your customers will want you to deliver FSMA 204 information so that they can most easily utilize it. NOT in the way that's easiest for you.

- How do you deliver information?
- How do you store it?
- How do you receive it?
- Where does it come from and how does it get there?

What tools are needed?

- Training
 - PCQI approach to traceability
- How to map your supply chain (internally and externally)
- Checklist of questions and processes for a multidisciplinary team
- Traceability Plan templates
- Education and outreach to your suppliers and customers

What resources are available?

- GS1
 - <https://www.gs1us.org/industries-and-insights/by-industry/foodservice/standards-in-use/food-safety#fsma>
 - Guidance documents
 - Sector-specific case studies
- IFT Global Food Traceability Center
 - <https://www.ift.org/gftc/research-and-resources>
 - Food Traceability Library
 - [A Guidance Document on the Best Practices in Food Traceability](#)
- TAG
 - www.achesongroup.com/traceability
 - Traceability Toolkit

What IT tools are available?

- IT Tools
 - Integration in existing IT systems?
 - Are new systems needed?
 - CTEs and KDEs describe when and what needs to be collected – not the data standard
- Data interoperability is key! Is everyone in your supply chain using the same data standard

What's Next?

- How do you know if you're impacted by FSMA 204?
- Do you need help producing your Traceability Plan?
- Are other functional areas of your business AWARE that FSMA 204 is coming and know what they need to do? (Legal, supply chain, IT, food safety)
- What do you need to do NOW to meet the enforcement deadline (January 20, 2026)?

Schedule a Traceability Assessment

Learn how the FSMA 204 food traceability rule applies to you.

- TAG is providing an assessment to help you determine what CTEs and KDEs apply to you
- Zoom call and initial written assessment
- \$500

Email "Traceability Rule Assessment": info@achesongroup.com

Questions?



Contact Us



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