Suppliers: Are your customers asking for food traceability?

Why TRACEABILITY FOR EVERYONE matters now and how to make it easy
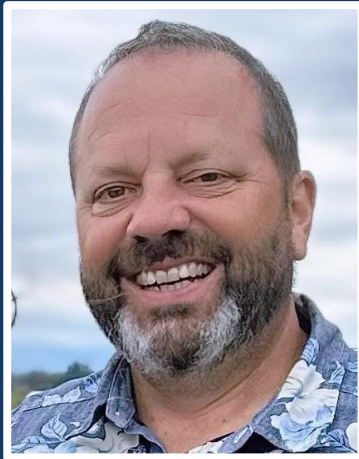
July 23, 2025

Welcome!

Housekeeping

- Enter your questions for the Q&A in the Questions panel on your screen.

- Everyone who registered for today's event will receive an email tomorrow containing:
  - Brian and Mark's contact information
  - A recording of the webinar
  - A link to download the slides

- Please take a moment to answer our survey!

Mark Johnson
Partner

mjohnson@repositrak.com

- Built a strong foundation in wholesale grocery through senior leadership roles at UNFI and C&S Wholesale Grocers, working with major chain and independent retailers covering the western region of the United States.

- Currently works closely with grocery retailers and wholesalers to implement scalable traceability solutions that ensure data accuracy, improve recall readiness, and meet the expectations of supply chain partners

- Expert in helping independent grocers and grocery chains succeed in supermarket marketing, category management, replenishment and inventory optimization

Brian Shanahan
Partner

bshanahan@repositrak.com

- Seasoned leader in retail category management and merchandising, bringing over two decades of experience from prominent roles at Stop & Shop and Rite Aid

- Serves as a trusted advisor to the industry on supply chain optimization, scan-based trading, regulatory compliance, and traceability solutions, guiding suppliers, food manufacturers, and retailers through the FDA's FSMA 204 rule and beyond

- Bachelor of Science in Food Marketing and a Master's Degree in International Marketing, both from Saint Joseph's University

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Today's Agenda

- What is food traceability and why is it important NOW?
  - The FDA delay does not matter

- How will you deal with multiple customers asking for traceability in multiple ways?

- Can your data put your customers at risk?

- Is an ASN enough for food traceability? Are labels enough?

- Conclusion and Next Steps

Our pedigree

ReposiTrak (NYSE:TRAK) is the world's largest connected network of suppliers, distributors and retailers with **30,000+ suppliers and 110,000+ facilities** across all product categories.
- Financially strong company traded on the New York Stock Exchange under ticker symbol NYSE:TRAK
- Seasoned executive leadership

With data management at its core, ReposiTrak technology is trusted by the food supply chain for traceability, food safety, inventory and sales performance.
- Banking-level security
- System and Organization Controls (SOC) 1 and SOC 2 Certified
- Stringent Development & Quality Assurance (QA) process

Who is ReposiTrak?

234
Egg Companies

644
Meat, Poultry & Deli Companies

1,052
Seafood Companies

1,219
Dairy & Soft Cheese Companies

3,029
Produce Companies

350,000+
Supplier/retailer/distributor connections on the platform

55,000,000
Item/store perpetual inventories maintained

Brands across the supply chain trust ReposiTrak

FSMA 204 is the law TODAY. But it's only the beginning.

It impacts persons who manufacture, process, pack or hold foods on the Food Traceability List.

What is food traceability?

Food Safety Modernization Act Section 204(d)

- FSMA was signed into law in 2011.
- Section 204d "Enhancing Tracking and Tracing of Food and Recordkeeping" was left **incomplete**.
- 3 separate lawsuits filed against the FDA in 2018 were settled in 2020 through consent decree, requiring FDA to:
  - ☑ Designate the list of "high-risk" foods as required by FSMA Section 204 (completed September 2020, now known as the **Food Traceability List** or **FTL**)
  - ☑ Publish a proposed rule, including **recordkeeping requirements** for those specified high-risk foods (completed September 2020)
 - ☑ **Issued a final rule** on Traceability (FSMA 204), in November 2022.

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Recalls are on the Rise. Can traceability help?

- As a supplier, the reputation of your brand is at stake.

- The focus is avoiding recalls of course, but in the event that a recall or traceback investigation occurs, it's about handling them aggressively and responsibly.

- **With traceability, you can know within minutes which lot codes have been shipped.**

Total USDA and FDA recalls
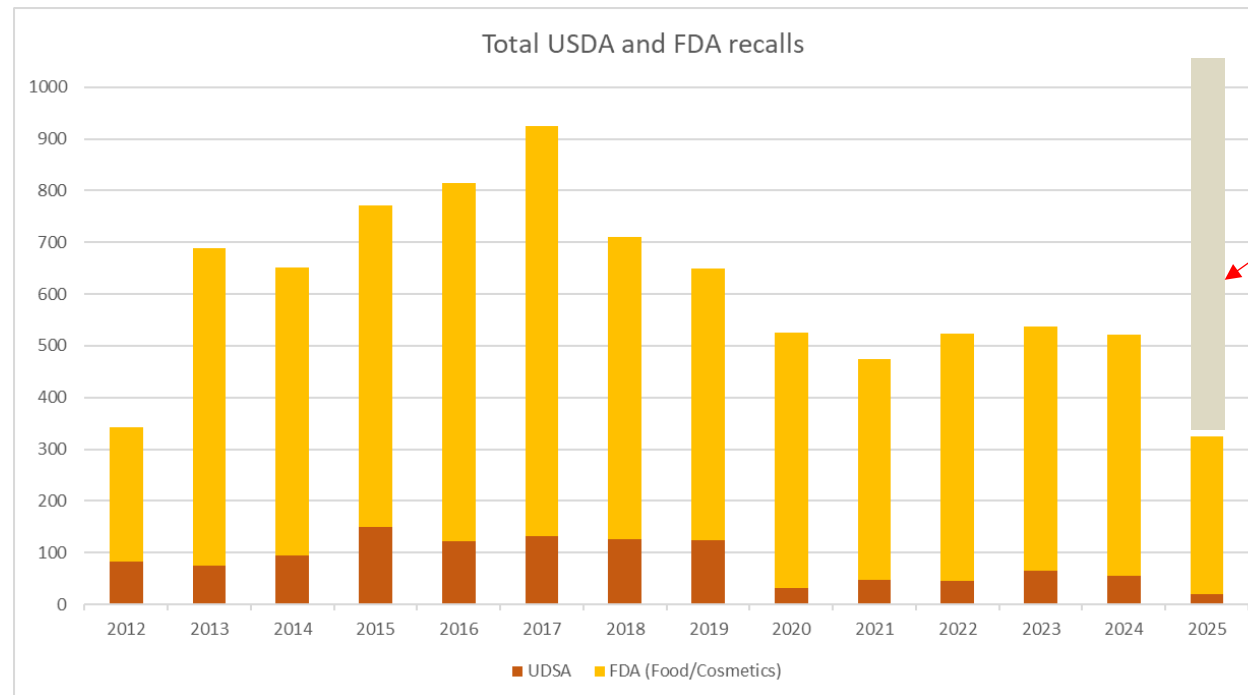
2025 recalls projected based on current rate through April

Legend: UDSA, FDA (Food/Cosmetics)

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Why is traceability important NOW?

It's the INDUSTRY – not the FDA – that's setting the pace.

- Traceability today was jump-started by the FDA when FSMA 204 became law.

- Today, major retailers, wholesalers, food manufacturers and foodservice operators – including Walmart, Sysco and Kroger – have made public commitments to traceability with more robust requirements than the FSMA 204 final rule on food traceability, including:

  ! Faster timelines

  ! More robust data requirements

  ! Traceability for more foods (sometimes *all foods*) instead of only foods on the Food Traceability List (FTL)

If your customers require food traceability then you – as a supplier – are required to support food traceability.

Are any of your customers on this list?

7-Eleven, Inc.
99 Ranch Market
Affiliated Foods, Inc.
Ahold Delhaize USA
Albertsons Companies Inc
Aldi, Inc.
Amazon Retail, LLC
ARKO Corp.
Associated Food Stores, Inc.
Associated Grocers
Associated Grocers of New
England
Blue Apron
CVS Pharmacy, Inc.
Caputo's Fresh Markets
Certco
Circle K
Costco
Dollar General
EG America (C-stores)
Fareway Stores Inc.

Fresh Thyme
Gopuff
H Mart
H. E. B. Grocery Company
Hy-Vee
KVAT Food Stores
KeHE
Key Food Stores Co-Operative Inc.
Kroger
La Michoacana Meat Market
Lidl - US
Marc's
McLane Co.
Meijer, Inc.
Natural Grocers by Vitamin
Cottage
North State Grocery
Patel Brothers
Piggly Wiggly Alabama Distribution
Company, Inc.
Publix Super Markets

QuikTrip
RaceTrac
Sams Club
Save A Lot
The Save Mart Companies
Schnucks
Sentry Albrecht's Delafield Market
Sysco
Target Corporation
Trader Joe's
URM Stores, Inc.
Village Super Market Inc.
Wakefern Food Corporation
Walmart
Wawa, Inc.
Wegmans
Whole Foods
WinCo Foods

Up Next: Poll Question

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10

The results are in!

How many of these companies are your customers today?

4% **None of the companies listed are my customers**

40% **Less than 5 companies**

39% **6-10 companies**

17% **More than 10 companies**

Snapshot of known food traceability requirements

Retailer/Wholesaler	All Foods or Food Traceability List (FTL)	Traceability Deadline
Albertsons	**All Foods**	**2025**
Affiliated Foods of Amarillo	**All FDA-regulated Foods (not meat)**	
Aldi	Food Traceability List	
Associated Wholesale Grocers (AWG)	Food Traceability List	2025
Associated Grocers of Baton Rouge	Food Traceability List	2025
Grocery Outlet	Food Traceability List	
H-E-B	Food Traceability List	2026
KeHE	**All Foods (for customers who require data for All Foods)**	
Kroger	**All Foods**	**2025**
McLane	Food Traceability List	2025
Sam's Club	**All Foods**	
Sysco	Food Traceability List	
Target	**FTL (now) / All Foods (future)**	
UNFI	Food Traceability List	2025
Village Supermarket	Food Traceability List	
Walmart	**All Foods**	**2025**
Wakefern/Shoprite	Food Traceability List	2025
Wegmans	Food Traceability List	2025
Whole Foods	Food Traceability List	2025

! **Some require FDA KDEs only**

! **Some require additional supply chain data**

! **Some have established deadlines that are sooner than the FDA (2025 vs. 2028)**

More and more of your customers will be asking for traceability and each will want different data.

- *How will you support that?*

- *What happens when you have dozens or hundreds of customers requiring different data?*

- *What happens when – at the same time – you're also dealing with the problem of taking in traceability data from suppliers?*

  - Your suppliers will have to get the data to you from all of their different systems.
  - You'll need to find a way to detect and correct errors to ensure that error-ridden files aren't getting into your supply chain data.
  - You'll need to combine supplier traceability data with receiving data and create new shipping traceability records t share with your customers.

- *How will you know if new traceability programs are announced?*

How will you do all this?

ReposiTrak

Here's how it works for <u>suppliers shipping to customers</u>:

ReposiTrak shares accurate traceability data with ALL OF YOUR CUSTOMERS...
according to their unique traceability rules.

500+ point error detection process

1

2

3

Supplier sends ReposiTrak
the data – in any format.
(via easy, automated onboarding)

ReposiTrak detects errors, we fix
what we can, and work with the
supplier to clarify inconsistencies
and make corrections.

*These steps repeat as many times as
needed until the data is as accurate and
complete as possible.*

ReposiTrak shares accurate
traceability data files with

– ALL OF YOUR CUSTOMERS –

based on their unique
traceability rules.

We do the heavy lifting to share <u>accurate</u> traceability data files with your customers.

ReposiTrak

Some suppliers may also have **INBOUND** traceability requirements:

If you have raw ingredient suppliers, you're responsible for INBOUND traceability from those suppliers...
as well as OUTBOUND traceability to your customers.

500+ point error detection process

500+ point error detection process

1 **2** **3** **4** **5**

ALL INBOUND SUPPLIERS
sends ReposiTrak the data
– in any format.
(via easy, automated onboarding)

ReposiTrak creates accurate
inbound and outbound
traceability data records.

*ReposiTrak detects errors, we fix what we can,
and work with the supplier, food manufacturer
or distributor to clarify inconsistencies and
make corrections. Cycle repeats as-needed.*

ReposiTrak shares accurate
traceability data files with the
retailer – based on their unique
traceability rules.

**We do the heavy lifting to take in and clean the data from your suppliers...
and then share accurate traceability data files with your customers.**

ReposiTrak

Even if you have the data and a way to share it…there is a MAJOR hidden risk

Your data could put your customers at risk!

How will you know if your files have errors?

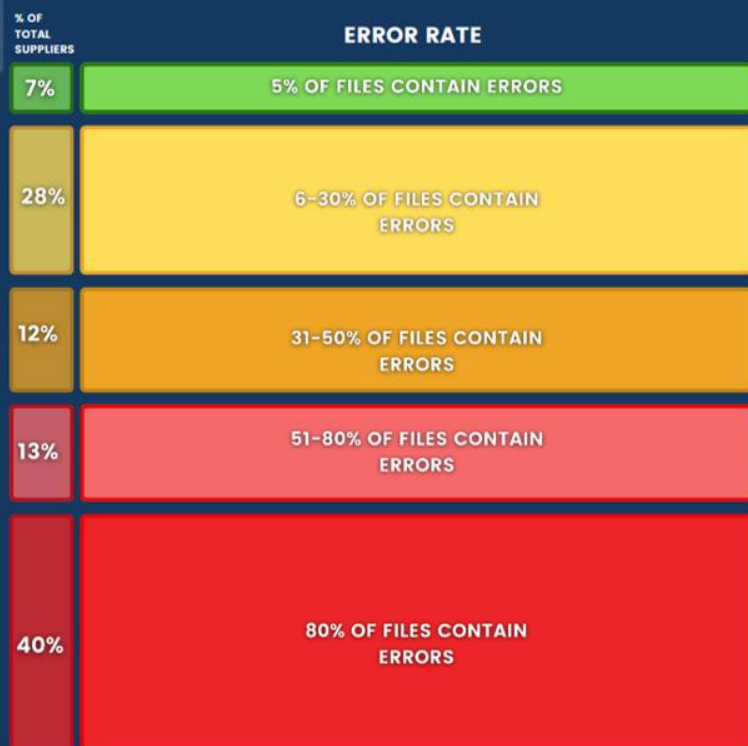**What will your customers think of you if the data you send is WRONG?**

How will you correct the errors in time?

Data Integrity: The Problem Inside The Problem

93% of supplier traceability data files contain errors!

- **In our experience processing tens of thousands of traceability files,** we've found and corrected all types of errors.

- Suppliers inadvertently send incomplete or inaccurate data....**even in an 856!** Common errors include:
  - A mis-keyed identifier for a distribution center, such as typing "DC01" instead of "DC1"
  - Data fields that are left empty, partially completed or that contain inaccurate information
  - Shipment files that are missing completely

- **Why do errors occur?** Traceability is new and it's hard. Suppliers are sharing data with many customers, with many different requirements.

- This is a **big problem**. Error-ridden files will not – and cannot – be accepted by the retailer because the risk is too high:
  - The retailer will be out of compliance with FSMA 204.
  - They may be forced to reject shipments.
  - There could be **fines or worse** for all involved.

% OF TOTAL SUPPLIERS — **ERROR RATE**

% OF TOTAL SUPPLIERS	ERROR RATE
7%	5% OF FILES CONTAIN ERRORS
28%	6-30% OF FILES CONTAIN ERRORS
12%	31-50% OF FILES CONTAIN ERRORS
13%	51-80% OF FILES CONTAIN ERRORS
40%	80% OF FILES CONTAIN ERRORS

ASNs and labels are not enough for every customer!

> FSMA 204 food traceability law. In *a recent interview with Progressive Grocer*, Frank Yiannas, former Deputy Commissioner for Food Policy & Response at the FDA and architect of FSMA 204, explained this "potential problem" with ASNs in more depth. "Everyone wants to simplify and are trying to confirm what foods are truly received, but doing it with ASNs alone does not comply with a receiving event," Yiannas said.

- ASNs indicate what the shipper *intends* to send, but not what actually gets loaded and transported, and then checked in at the warehouse, store or restaurant where it's received.

- Although major retailers and wholesalers are relying on ASNs, not all retailers and wholesalers will be able to support new data fields like the Traceability Lot Code (TLC) or TLC Source; they will not always support the FDA's data storage requirements (2 years)

- There is no such thing as a standard ASN. Different retailers may have different fields as part of their ASNs. The data that the supplier includes in what they send could originate in a number of places: a perpetual inventory system, purchase order verification process, production run or the format of the ASN might be driven by the customer's requirements. This variability makes the origins and accuracy of the ASN unknowable.

- ASNs have an error rate of 5-10%. For the average retailer, that could mean an average of nearly 8,000 per year. How will you detect errors? Who from your team will correct them?

- In addition, labels alone are not enough. Labels don't contain all traceability data elements, because some of that information is not available when labels are printed

Read More: https://repositrak.com/blog/9-reasons-why-asns-alone-wont-work-food-traceability/

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How long does it *really* take to start sharing ACCURATE food traceability data?

Here's what needs to happen:

Onboard with your customer's traceability program and understand requirements

Find the required data in your system

Format the data according to the customer's requirements
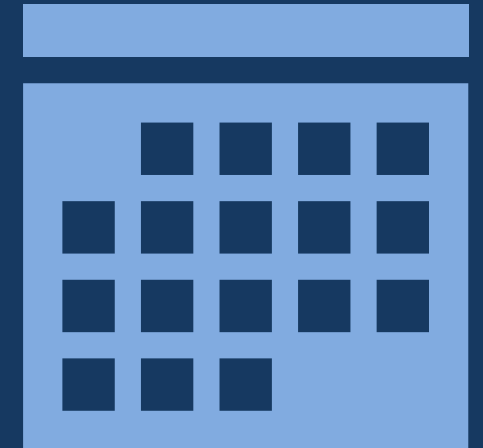
Start sharing the data

Detect errors and make corrections

Transmit the data according to your customer's requirement

REPEAT data sharing process for EVERY SHIPMENT, EVERY TIME

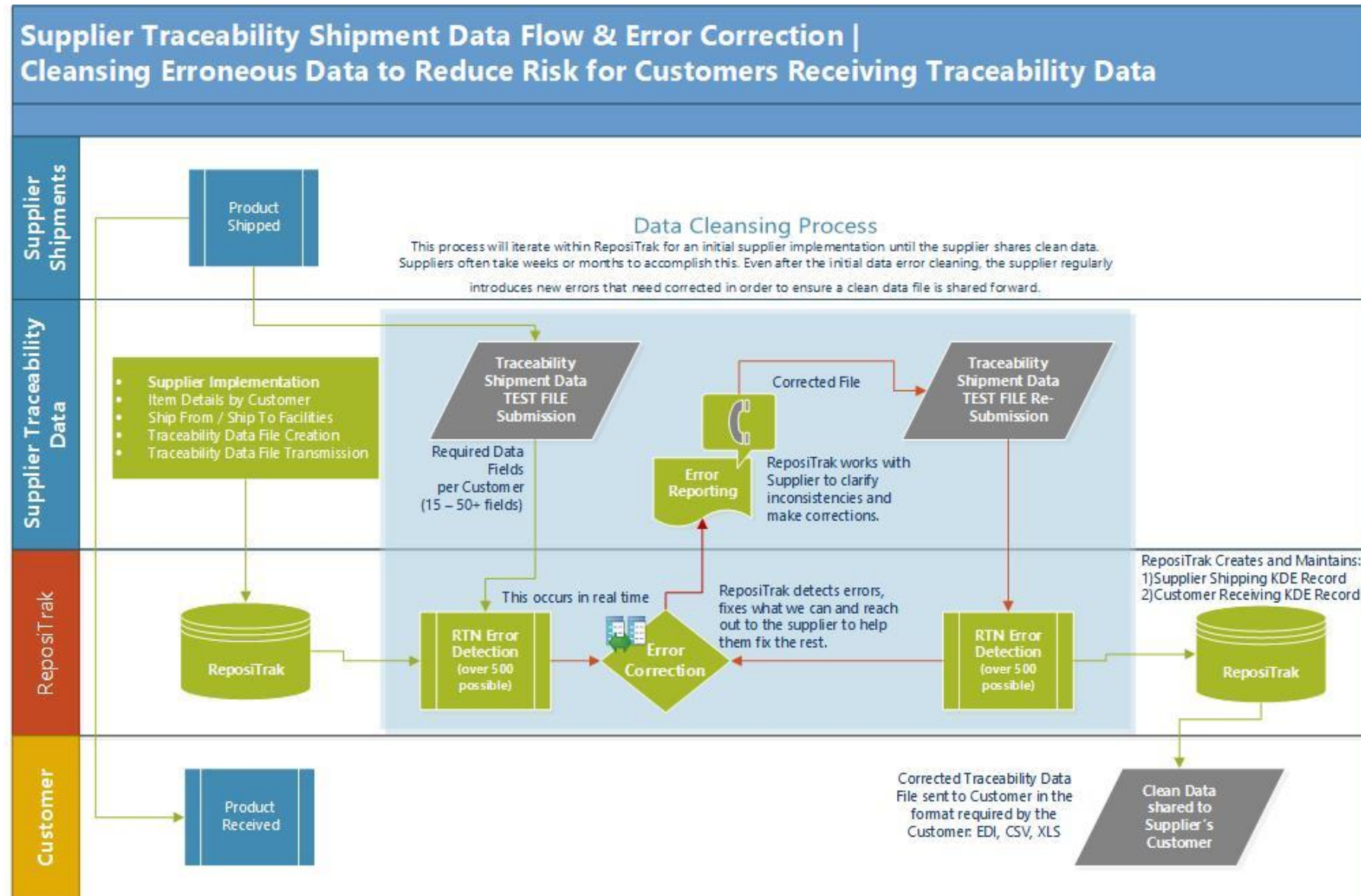**For the average supplier, it can take 120 or more days to get accurate data shared consistently.**

The results are in!

How much progress have you made to-date toward traceability?

21%   **No progress yet**

63%   **Some progress**

16%   **Done and sharing data!**

How does ReposiTrak *do* food traceability?

Supplier Traceability Shipment Data Flow & Error Correction | Cleansing Erroneous Data to Reduce Risk for Customers Receiving Traceability Data

Supplier Shipments

Product Shipped

Supplier Traceability Data

- Supplier Implementation
- Item Details by Customer
- Ship From / Ship To Facilities
- Traceability Data File Creation
- Traceability Data File Transmission

Data Cleansing Process

This process will iterate within ReposiTrak for an initial supplier implementation until the supplier shares clean data. Suppliers often take weeks or months to accomplish this. Even after the initial data error cleaning, the supplier regularly introduces new errors that need corrected in order to ensure a clean data file is shared forward.

Traceability Shipment Data TEST FILE Submission

Required Data Fields per Customer (15 – 50+ fields)

Error Reporting

Corrected File

ReposiTrak works with Supplier to clarify inconsistencies and make corrections.

Traceability Shipment Data TEST FILE Re-Submission

ReposiTrak

ReposiTrak

This occurs in real time

RTN Error Detection (over 500 possible)

Error Correction

ReposiTrak detects errors, fixes what we can and reach out to the supplier to help them fix the rest.

RTN Error Detection (over 500 possible)

ReposiTrak

ReposiTrak Creates and Maintains:
1) Supplier Shipping KDE Record
2) Customer Receiving KDE Record

Customer

Product Received

Corrected Traceability Data File sent to Customer in the format required by the Customer: EDI, CSV, XLS

Clean Data shared to Supplier's Customer

ReposiTrak does EDI, too.

We help nearly 1,000 non-EDI capable companies to share data using EDI or other protocols today.

The Problem:
- Some of the largest retailers and wholesalers asking for food traceability data are expecting the data to be delivered via EDI in the ASN 856 format.
- Many suppliers do not have EDI capabilities , and don't know where to start.
- EDI is just a mechanism for data delivery, but it has problems:
  - Supplier traceability data can have a <u>high number of errors</u>, and EDI doesn't capture and correct them
  - EDI can be expensive, as the price is based on <u>data volume</u>: the more you ship the more you pay
  - Retailers and wholesalers want <u>different data </u>sets transmitted, which is hard to keep up

How does ReposiTrak help?
- Through ReposiTrak, you can send the data in <u>one way</u>...and ReposiTrak gets the data to your customers according to your different customers' different requirements.
- ReposiTrak <u>validates the accuracy of your data </u>and <u>helps you quickly address errors</u> using our 500+ point error detection process.
- We've been doing this for 25+ years and our team of experts can get you traceability ready for a low, flat fee, that's <u>not based on shipment volume</u>.

ReposiTrak helps with with dozens of different EDI and non-EDI document types, including:

214, 810, 812, 816, 820, 824, 832, 846, 850, 852, 855, 856, 860, 864, 875, 878, 879, 880, 888, 889, 894, 940, 997, CSV, XLSX, XML, JSON Fixed-Length

To start sharing data with customers:

Visit: https://repositrak.com/fda-food-traceability/traceability-for-suppliers/

1. Click the **GET STARTED** button.

2. You'll be guided through a series of steps to tell us about your company and your customers.

3. Then, we'll show you how to build and share your files with ReposiTrak.

4. Once we've received your files, we'll check them for accuracy, identify any errors and notify you of our findings. We'll help with corrections.

5. We'll share the accurate data files with your customers for every shipment.
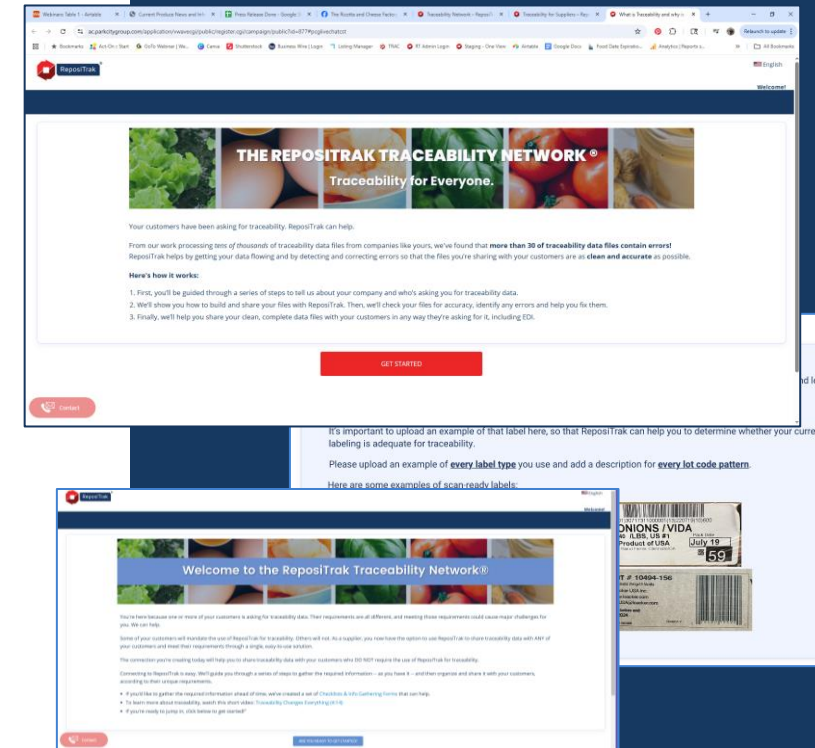
To talk about a traceability program for inbound *and* outbound, call us!

Conclusion and Next Steps

In conclusion:

- ReposiTrak is the largest traceability network, with hundreds of suppliers already successfully sharing traceability data with dozens of retail customers. Thousands of more suppliers are also in the queue to connect.

- We've been doing supply chain data exchange like this for more than 20 years and are pioneers in the traceability space.

- If your customers haven't already asked for food traceability data, they will be soon. You need to be able to share the data with every customer, according to their unique traceability requirements. NO TWO CUSTOMERS WILL BE THE SAME!

- From our work processing tens of thousands of files, we know what types of errors can occur and our solution INCLUDES error detection and correction. Our 500+ point error detection process is included when you use the ReposiTrak Traceability Network.

- Protect your reputation by delivering clean, accurate data to your valued customers with the help of the world's largest traceability network.

- Reduce friction with retailers and improve business relationships.

- Focus on your business while we handle the data cleaning and data exchange.

Next Steps: Call or email us. Share this information with your team.

Thank you!

Questions?

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