

# **FMSA 204 Traceability is Here**

### The challenges and what to do NOW!

November 2023



## What categories of products need to be tracked?







Every Critical Tracking Event (CTE) has a set of Key Data Elements (KDEs) that must be collected and saved as an easily retrievable record.

Shipping and Receiving CTEs require collaboration between thousands of trading partners.





#### https://www.fda.gov/media/163132/download

# **Shipping KDE Record**

The shipping record combines product data with shipment/transaction data. A label, importantly, can only contain the product (static) information.

- Product1. The traceability lot code for the fooddata that2. The product description for the food
  - 3. The location description for the traceability lot code source, or the traceability lot code source reference
    - 4. The location description for the location from which the food was shipped
    - 5. The reference document type and reference document number
  - 6. The location description for the immediate subsequent recipient (other than a transporter) of the food
  - 7. The quantity and unit of measure of the food (e.g., 6 cases, 25 reusable plastic containers, 100 tanks, 200 pounds)
  - 8. The date the food was shipped

Shipment data that changes as the product moves

stays the

same



## **Receiving KDE Record**

The receiving record combines product data with receiving/transaction data. A label, importantly, can only contain the product (static) information.

Product data that stays the same

Shipment

data that changes as

moves

the product

- 1. The traceability lot code for the food
- 2. The product description for the food
  - 3. The location description for the traceability lot code source, or the traceability lot code source reference
  - 4. The location description for where the food was received
  - 5. The location description for the immediate previous source (other than a transporter) for the food
  - 6. The reference document type and reference document number
  - 7. The quantity and unit of measure of the food (e.g. 6 cases, 25 reusable plastic containers, 100 tanks, 200 pounds)
  - 8. The date the food was received



# The big challenges

#### At the Supplier Shipping Location

- Your customers need to receive Traceability Lot Code Data and Lot Code Source Reference data from you.
- If you don't track these today, you need to start.
- Your biggest risk is that all your customers choose to do traceability data collection differently, creating more work and cost for you.

#### At the Distribution Center

- Lot codes are not tracked in wholesaler and retailer DCs today.
- Instituting the systems and processes to track lot codes is expensive and takes months or even years to implement.
- DCs can't create KDE records if they don't have a way to collect and track lot codes.

#### At the Retail Store

- As a retailer, you MUST have a KDE receiving record for products received at the store, warehouse and DSD items.
- This is not optional...the store KDE receiving record needs to be created by someone.
- As a receiver, you likely know the shipment data, so how do you collect the lot code data?



## Labels are required, but NOT the complete solution

- All cases/shipping units need to have identifying lot code information.
- If you don't have labels or Traceability Lot Code case identification, you should address this ASAP...it will be required by your customers.
- Adopt the GS1 standard.
- IMPORTANT: Labels only carry the <u>product</u> Key Data Elements, not the <u>shipment</u> <u>data</u>...so labels alone can't be used to generate the required KDE record.

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### **Product Suppliers**

- 1. Evaluate your labeling, standardize to GS1 labels.
- 2. Don't be surprised if customers require you to do traceability even if you don't have products on the FSMA 204 list.
- 3. Make sure your teams understand the risk of customer fragmentation and look for a technical solutions that require little to no new work or cost for you or your customers.

#### Wholesalers/Distributors/Retailers

- 1. Identify the products and suppliers you need to track/trace...this is not easy!
- 2. Identify the DC/warehouse systems and processes that need to change.
- 3. Understand the requirements of retail stores and what systems and processes need to change.
- 4. Identify and establish the human and technology infrastructure required to support traceability.



ReposiTrak's findings: The amount of time and effort required to develop and implement a traceability program is far greater than most people think



### Currently...

2,000+

Supplier Connections 30+

DC/Warehouses

4,500+

**Retail Stores** 



### Others are talking about FSMA 204 food traceability, but ReposiTrak is doing it.



How will **Traceability Data** get shared between the trading partners/facilities as product moves through the supply chain?



ReposiTrak completely automates KDE record creation for suppliers into DC and stores. Receiving at stores is simplified using the ReposiTrak mobile app.



# **Manual TLC Data Capture**

### As easy as taking a picture

- The ReposiTrak Mobile App captures images of case labels
- The system automatically pulls the TLC data from the image and matches it to shipping data in the system
- Photo Record images are available to view, attached to the new, complete KDE Record
- This is the easiest and most complete KDE record that can be created where automated data exchange is not possible





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# **ReposiTrak Traceability Network is LIVE**

- Lowest cost, easiest to deploy and use solution for FDA traceability
- Flat fee, unlimited use pricing model caps the total cost of traceability, regardless of shipment volume
- Includes manual data entry for smaller companies
- Automates error tracking
- Recall automation is also available



# Questions

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ReposiTrak is DOING traceability, while others are simply talking about it. Talk to us to find out why.

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