December 16, 2024

RE: Implementation of the FDA Final Food Traceability Rule

Dear Valued Albertsons Companies Supplier:

We are writing to outline the requirements for working together to comply with FSMA 204, also known as the FDA Final Food Traceability Rule (the "Final Rule"). The Final Rule establishes traceability recordkeeping requirements, beyond those in existing regulations, for entities who manufacture, process, pack, or hold foods included on the Food Traceability List (FTL).

While the current Final Rule initially mandates additional records only for items listed on the FTL, in anticipation of the FTL evolving to include new items and to ensure ongoing compliance, we require the exchange of specific Key Data Elements (KDEs) associated with Critical Tracking Events (CTEs) for all food products shipped to our manufacturing locations, distribution centers, and stores via direct delivery.

<u>**HERE'S WHAT THIS MEANS FOR YOU**</u>:

Effective June 30, 2025, for all food products shipped to any Albertsons location we require you to transmit the following information electronically using Electronic Data Interchange (EDI) communication protocols:

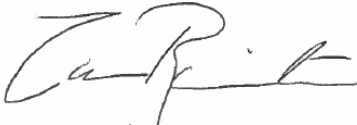|	
Advanced Ship Notice (ASN)	An ASN must be provided for each shipment. Your ASN must include the mandatory KDEs associated with the relevant shipping CTEs. For shipments to manufacturing locations and distribution centers you must provide an EDI 856 ASN. For direct store deliveries you must provide either an EDI 856 <u>OR</u> 857 ASN.
Pallets	Pallet labels must include a GS1 US Serial Shipping Container Code (SSCC) that is linked to the ASN.
Cases	Case labels must include a GS1-128 barcode with a Global Trade Item Number (GTIN) and the following GS1 Application Identifiers: 10- Batch or Lot Number 13- Pack Date 17- Expiration Date (Optional) The use of additional GS1 AI is optional.
Reference Documents	KDEs associated with the relevant shipping CTEs must be included in at least one type of reference document accompanying each shipment including: Bills of Lading (Preferred Document to Contain KDE's) Shipping Manifests Packing Lists Store Invoices (For Direct to Store Deliveries)

For your convenience, attached to this letter is an FAQ document, which includes additional information and links to resources to help you with your compliance effort.

We value our relationship with you and are committed to working collaboratively to ensure the smooth implementation of this new regulation. If you have any questions or require further clarification, please do not hesitate to contact our Albertsons Companies Food Traceability Team at FoodTraceability@albertsons.com.

Sincerely,

Gineal Davidson
SVP National Merchandising

Evan Rainwater
EVP, Supply Chain & Manufacturing

FOOD TRACEABILITY FREQUENTLY ASKED QUESTIONS & RESOURCES

Meeting the traceability requirements of the new FSMA 204 Final Food Traceability Rule (Traceability Rule) is a collective responsibility between Albertsons Companies and its suppliers.

These FAQs and links to additional resources aim to help suppliers understand and meet our traceability requirements for **ALL** food and non-alcoholic beverages supplied to any Albertsons location.

This document is for guidance purposes only and should not be considered legal advice. Suppliers should seek their own legal counsel on how to comply with all laws and regulations applicable to products supplied to Albertsons. For more information on the Traceability Rule, please refer to FDA's FSMA Final Rule on Requirements for Additional Traceability Records for Certain Foods and FDA's FAQ on the FSMA Food Traceability Rule.

Why is Albertsons requesting additional traceability data for ALL food and non-alcoholic beverage products and not just foods on the Food Traceability List?

Expanding the FSMA 204 traceability requirements for all food and non-alcoholic beverage products will help us to work toward ensuring a safer food supply chain for our valued customers. Further, considering that the FDA acknowledges the Food Traceability List (FTL) can expand, we see value in taking a more proactive approach now to avoid continuous changes for Albertsons and our suppliers as the Traceability Rule evolves.

What are Albertson's food traceability requirements?

Albertsons requires that for each shipment, all suppliers shipping any food and non-alcoholic beverages products to any Albertsons location share the required data elements included on the attached Traceability Data Element Requirements by:

1. Transmitting an EDI Advanced Shipping Notice (ASN). The ASN must meet the requirements set forth in the applicable Albertsons EDI Specification.
   - Albertsons EDI Specifications can be found on the Supplier Site under *Electronic Data Communications*. EDI Specifications are currently in the process of being updated to include Traceability Rule requirements.
   - For shipments to a distribution center/warehouse reference Albertsons EDI 856 Specification.
   - For direct to store and cross docking deliveries (together referred to as "DSD") reference Albertsons EDI 856 Specification or at suppliers' election, the Albertsons EDI 857 Specification.
2. Labeling cases and pallets to include the required data elements; and
3. Including the required data elements on the appropriate reference document accompanying the shipment. For warehouse deliveries the reference document is the Bill of Lading (BOL), for DSD the reference document is the store invoice.
   - See here for an example from the FDA of How Required KDE's Could Be Shared on an Invoice or BOL.

I am an Own Brands Supplier, do the Traceability Data Element Requirements replace existing requirements for sharing data?

No, Own Brands suppliers are still required to adhere to Albertsons' labeling and packaging requirements for Own Brands suppliers found at the OB Supplier Central within the Supplier Handbook.

Do Albertsons' traceability requirements apply to all food and non-alcoholic beverage suppliers?

Yes, our traceability requirements apply to all suppliers that supply Albertsons with food and non-alcoholic beverages, including:

1. Suppliers who ship to our distribution centers;
2. OWN Brands suppliers, including suppliers of ingredients to our manufacturing facilities;
3. DSD suppliers (which includes cross docking deliveries); and
4. Suppliers who ship/deliver to our retail central kitchens and satellite stores.

What if I qualify for a full or partial exemption under the Traceability Rule?

We recognize that the Traceability Rule provides for certain full or partial exemptions. However, because Albertsons is requesting the required data elements for all foods and non-alcoholic beverages, not just those on the FTL, there are no exceptions to Albertsons' traceability requirements.

I do not currently use the required GS1 standards as part of my shipping process, can I identify and share the required data elements another way?

No, to facilitate communication and information sharing between supply chain partners, we require you to leverage the GS1 standards to identify, capture and share the required data elements.

To help you understand how GS1 standards can support implementation of the Traceability Rule visit:
- Retail Grocery and Foodservice Application of GS1 System of Standards to Support FSMA 204
- GS1 Standards for FSMA 204 – YouTube video
- How GS1 Standards Support Product Tracing, Critical Tracking Events and Key Data Elements
- Guide to GS1 Standards Adoption for Supply Chain Visibility

How can I learn more about, and get, a GS1 barcode, GTIN and SSCC?

A good start to learn about the GS1 standards in general is by visiting the GS1 General Specifications Standard document.

To learn more about and obtain a GS1-128 Barcode with Global Trade Item Number (GTIN) you can visit these resources:

- [GS1: What is a GS1-128 Barcode?](#)
- [GS1: How to Create a GTIN](#)
- [GS1: Get A Barcode/GTIN](#)

To learn more about and obtain a GS1-128 US Serial Shipping Container Code (SSCC) barcode you can visit this resource: [GS1: About the Serial Shipping Container Code - SSCC.](#)

I am not familiar with the required data elements "Traceability Lot Code" and "Traceability Lot Code Source," what are these?

Traceability Lot Code:

The traceability lot code (TLC) is a descriptor, often alphanumeric, used to uniquely identify a traceability lot within the records of the traceability lot code source (defined below). The TLC is similar to what industry currently refers to as a 'lot' or 'lot code.'

There is flexibility in how the TLC can be constructed, however for consistency we recommend using the GTIN + lot code (12-20 digits alphanumeric) in GS1 US standard.

Other examples include a lot code, batch code or other production code. This information, taken together, could be used as a traceability lot code, provided it meets the definition of "traceability lot code" in the Traceability Rule.

Traceability Lot Code Source and Traceability Lot Code Source Reference

A traceability lot code source refers to the physical location where a food was assigned a traceability lot code. The lot code source can be communicated by providing the key contact information for the place where the food was assigned a traceability lot code (physical address and phone number) or by providing an alternative method for location description for the traceability lot code source – either/or DUN'S number or GS1 Global Location Number (GLN). This alternative method is referred to as the Traceability Lot Code Source Reference.

For more information about Traceability Lot Codes (and to see examples on how to construct a Traceability Lot Code), you can visit the FDA Traceability Lot Code Source Guidance Page.

When do I need to comply with Albertsons' traceability requirements?

We encourage you to start sharing the required traceability data elements as soon as possible to ensure a smooth transition, but all suppliers must comply no later than June 30, 2025.

What if I do not comply with Albertsons' deadline?

If you are unable to, or elect not to, comply by the June 30, 2025, deadline, Albertsons may be forced to reevaluate our business relationship with you. Failure to comply with the Traceability Rule compliance date set by the FDA may result in FDA enforcement action.

I still have questions, who can I contact at Albertsons for help?

We understand that these new requirements may raise some questions and concerns, and we are committed to working with you to understand our new requirements. For any questions not addressed here or in the suggested resources, please contact the dedicated Albertsons Companies Food Traceability Team at FoodTraceability@albertsons.com.

DISCLAIMER: This document is for guidance purposes only and should not be considered legal advice. Albertsons does not provide legal advice to suppliers, so suppliers should seek their own legal counsel on how to comply with all laws and regulations applicable to their product.

TRACEABILTY DATA ELEMENT REQUIREMENTS**

Required Data Element	ASN	Case	Pallet	Reference Document
PO Number	X			X
Bill of Lading	X			X
Ship Date	X			X
Ship From Location	X			X
Ship To Location	X			X
GTIN	X	X	X	
Product Description	X	Case Printed		X
Lot Number (Batch Number)	X	X		X
Expiration Date	X	alt*		alt*
Lot Number Expiration Date	X	alt*		alt*
Pack Date (Production Date)	X	alt*		alt*
Traceability Lot Code	X			X
Traceability Lot Code Source (Physical Address) **or** Traceability Lot Code Source Reference (GLN or DUNS)	X			X
Country of Origin	X	Case Printed		
Quantity	X			X
Unit of Measure	X			X
Net Weight, Pounds (variable measure trade item)			X	
Gross Weight, Pounds			X	
Gross Weight, Kilograms			X	
Information Carrier	EDI ASN	GS1-128 (GTIN and Lot/Date)	SSCC	BOL or Invoice

* Alt designates alternative Traceability Lot Code.

** OWN Brands Supplier (private label products) have additional requirements. See Own Brands Supplier Handbook on the Supplier Central Portal.