

December 13, 2024

Dear Valued Foodservice Supplier,

We're reaching out with details about McLane's efforts to comply with the FDA's Food Traceability Rule (FTR), also known as FSMA 204. To meet the federal deadline of **January 20, 2026**, we are requesting your assistance in providing essential information.

FSMA 204 Compliance Requirements

The FDA's January 2023 Final Rule on Requirements for Additional Traceability Records for Certain Foods redefines traceability standards for items listed on the FDA's Food Traceability List (FTL). Compliance with FSMA 204 requires tracking Key Data Elements (KDEs) for each Critical Tracking Event (CTE) for these items. This includes linking the manufacturer's lot code to all CTEs within the supply chain. Entities, including suppliers, manufacturers, and distributors, must assign a "traceability lot code" (TLC) to each FTL food item.

Suppliers are required to transmit specific KDEs for each FTL item provided to McLane, including (but not limited to):

- Ship To Location (Immediate Subsequent Recipient)
- Ship From Location (Immediate Previous Source)
- Product Description
- GTIN
- Traceability Lot Code
- Quantity & Unit of Measure
- Ship Date, and
- TLC Source or TLC Reference

For additional details on FSMA 204 requirements, visit the FDA's website by clicking here.

GS1 Standards for FSMA 204 Implementation

To assist with FSMA 204 compliance, GS1 has collaborated with industry groups to create consensus standards that streamline compliance across the food supply chain, reducing the need for multiple, customer-dependent systems. For guidance on these standards, please <u>click here to read more</u>.

Compliance Timeline

McLane requests that suppliers be ready by **June 30, 2025** to transmit Shipping KDEs. Some customers may require KDE compliance for all food items, not just those on the FTL, and may set additional deadlines.

Data Request Submission

To meet both FDA and customer requirements, McLane requires all suppliers to complete a data submission. Please visit https://share-ify.com/mclane and complete the "McLane FSMA 204 Supplier Form" by Friday, December 13, 2024.



McLane FSMA 204 for Restaurant Customers

McLane has selected **Share-ify** as its supplier compliance platform. Suppliers with existing subscriptions can upload information at no additional cost. If you need assistance with Share-ify, refer to the "Share-ify Upload" section in the Addendum.

Labeling and KDE Transmission Requirements

To ensure smooth data transmission, McLane requires the following steps:

- 1. Validate all shipping records for accuracy.
- 2. Electronically submit Shipping KDEs via Advanced Ship Notice (ASN) or other API.
- 3. Provide physical records (such as a Bill of Lading) upon delivery.
- 4. Assign a unique TLC and standardized Key Data Elements format for all shipments.
- 5. Assign a GS1 GTIN to each FTL item.
- 6. Use GS1 Global Location Numbers (GLNs) for all relevant locations and upload them to Share-ify.
- 7. Use GS1-compliant data carriers (GS1-128 barcode labels) with TLC Source references on two adjacent package sides, unless otherwise agreed.
- 8. Use GS1 SSCC-18 pallet tags to reference TLCs for each pallet, identifying any mixed pallets.
- 9. Clearly label FTL products and pallets with distinctive labels or markings.

As McLane continues with our compliance rollout, we'll provide further updates. If you have questions, please email us at **fsma204@mclaneco.com**.

Thank you for your time and support in this compliance effort. Additional guidance can be found in the Addendum.

Sincerely,

Syndee Stiles

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Vice President

Procurement

Jeff Hayes

Jeff Hayes

Vice President

Sales & National Accounts