



The Global Language of Business

The How

Industry Defined Guidance to Help Meet FSMA 204 Record Keeping Requirements

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Antitrust Caution



GS1 US is committed to complying fully with antitrust laws.

We ask and expect everyone to refrain from discussing prices, margins, discounts, suppliers, the timing of price changes, marketing or product plans, or other competitively sensitive topics.

If anyone has concerns about the propriety of a discussion, please inform a GS1 US® representative as soon as possible.

Please remember to make your own business decisions and that all GS1 Standards are voluntary and not mandatory.

Please review the complete GS1 US antitrust policy at:
<https://www.gs1us.org/antitrust-policy>

Agenda

- FSMA 204 Basics
- FMI Supporting the Food Industry
- GS1 US Supporting the Food Industry
 - The Importance of Unique Identification for FSMA 204
 - Industry Developed Guidance
 - **Identify-Capture-Share** for FSMA 204
- End-to-End Supply Chain Process Flow Example
- Benefits Beyond Regulation

How do GS1 Standards Enable Traceability for Enhanced Food Safety?

1 Unique Product Identification



2 Standardized Exchange of Data



3 Precise Recall Readiness



Recap: FSMA 204 Final Rule Basics



What is it and Who is Impacted?

FSMA Final Rule on Requirements for Additional Traceability Records for high-risk products outlined in the **Food Traceability List**. **Includes foreign and domestic entities. Full and partial exemptions may apply.**

What is Required?

Must keep records on foods from Farm to Store/Restaurant by **production LOT**. Supply chain partners need to share records. Provide **CTEs-KDEs to FDA within 24 hours**.
Must keep a documented **Traceability Plan**

When?

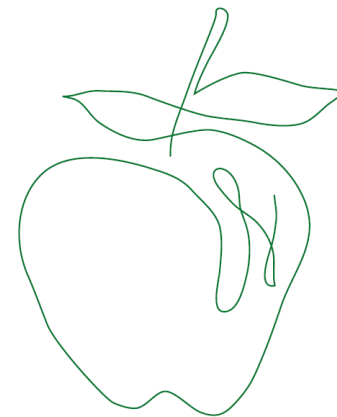
FINAL Rule Effective: January 2023
Compliance date: January 2026
Records should be maintained for 2 years

FMI – The Food Industry Association



As the **food industry association**, FMI works with and on behalf of the entire industry to advance a **safer, healthier** and **more efficient** consumer food supply.

FMI brings together a wide range of members across the value chain — from **retailers** who sell to **consumers**, to **producers** who supply the food, as well as the wide-variety of companies providing critical services — to **amplify** the collective work of the industry.



www.fmi.org

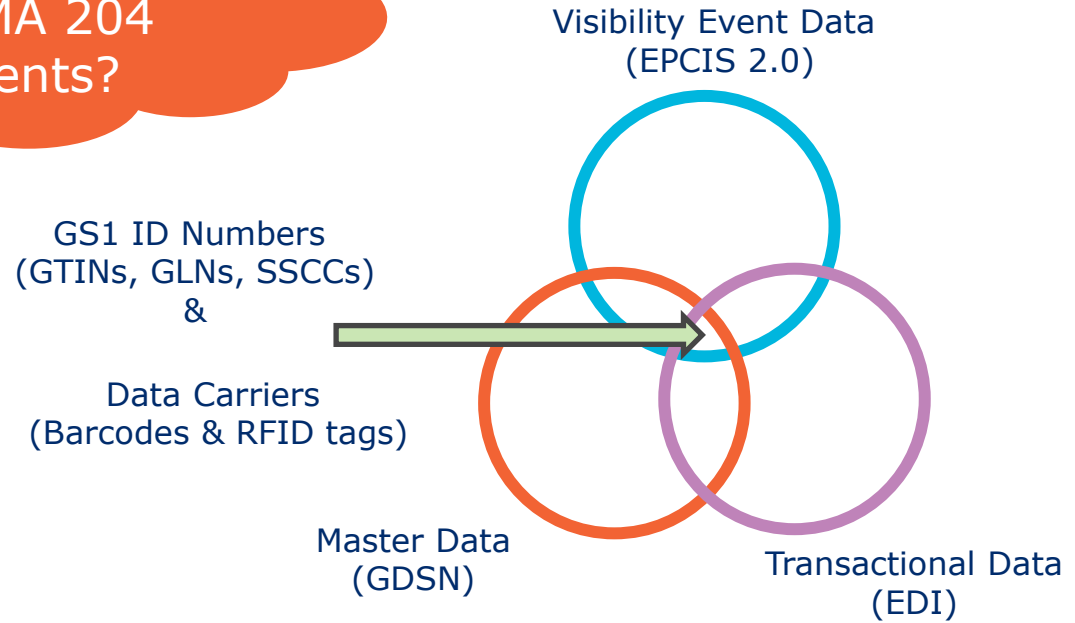
GS1 US Supporting the Food Industry



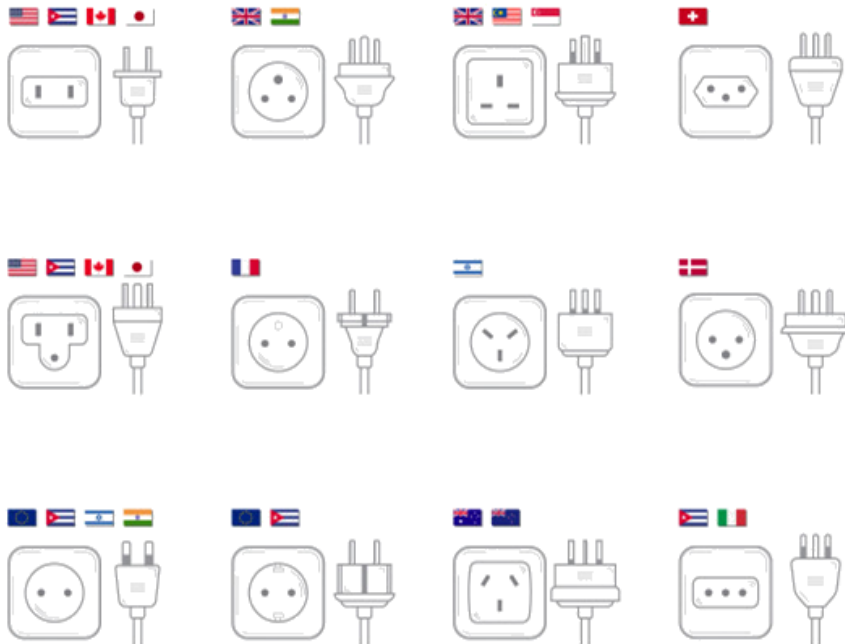
What do I need to
meet FSMA 204
requirements?



Data Exchange Today



One Common Language



The only way businesses big or small can move forward is to work together. They need to be able to **understand each other** anywhere in the world.

Business requires a common language, and we make that possible.



More than
10 billion
GS1 barcodes are
scanned everyday
1 billion products carry
GS1 barcodes.



GS1 US® serves more
than **300,000**
businesses in the
United States.



Over
2 million companies
around the world use GS1
Standards



GS1 US serves over **25**
industries including
retail grocery, food
service, health care,
apparel, and general
merchandise



More than
40 million
products are registered
by brand owners in the
GS1 Global Data
Synchronization
Network™ (GDSN)



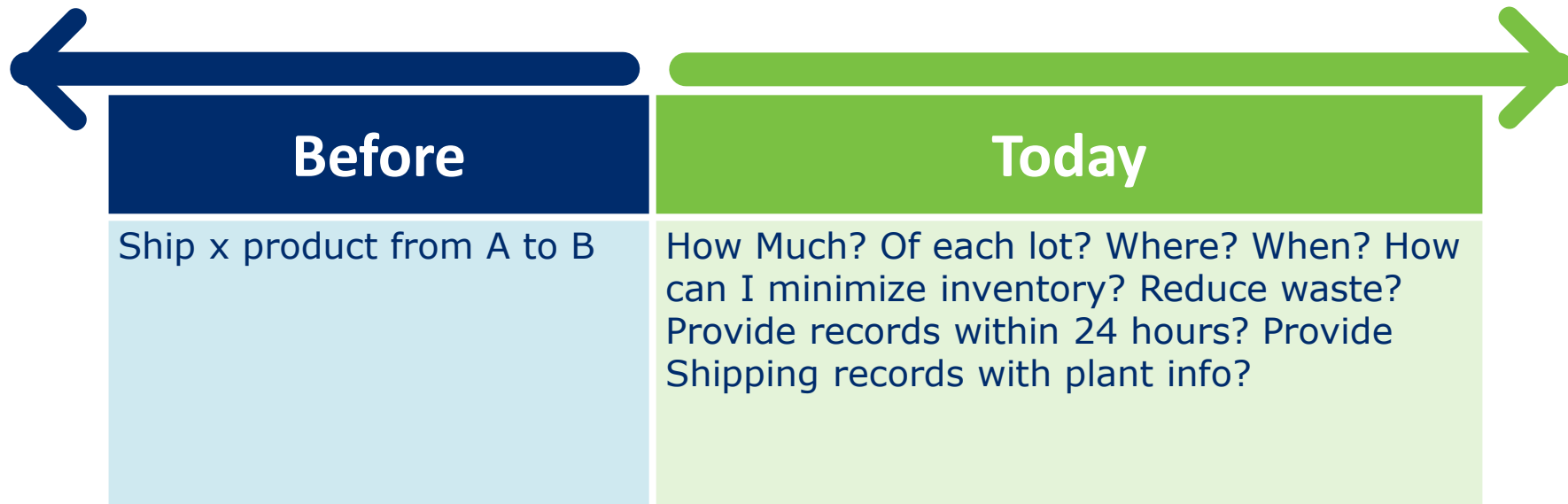
Over
45 million
GTINs are in the GS1 US
Data Hub Product Tool



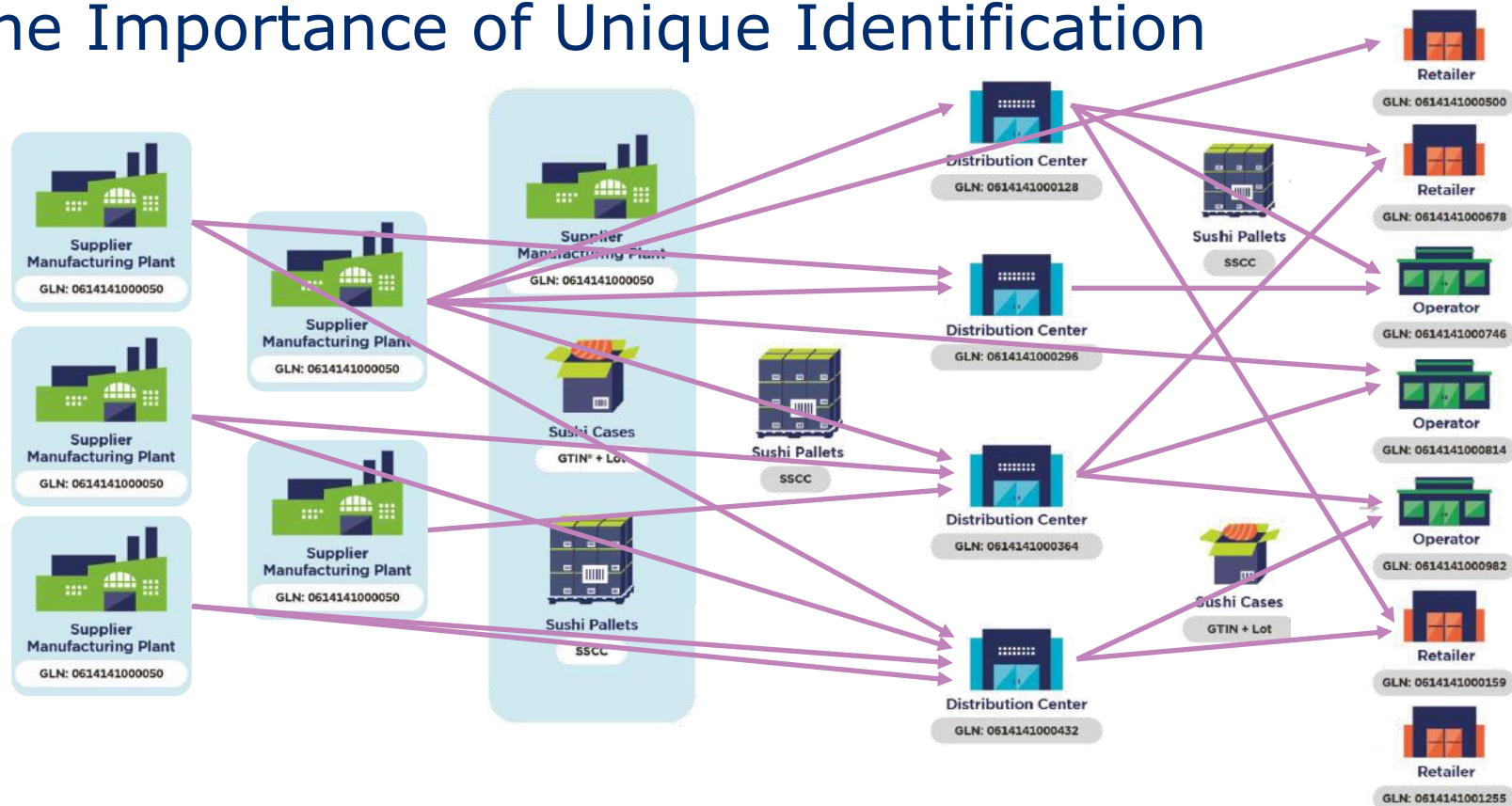
GS1 is made up of
116+ member
organizations
serving businesses
around the world



The Importance of Unique Identification



The Importance of Unique Identification

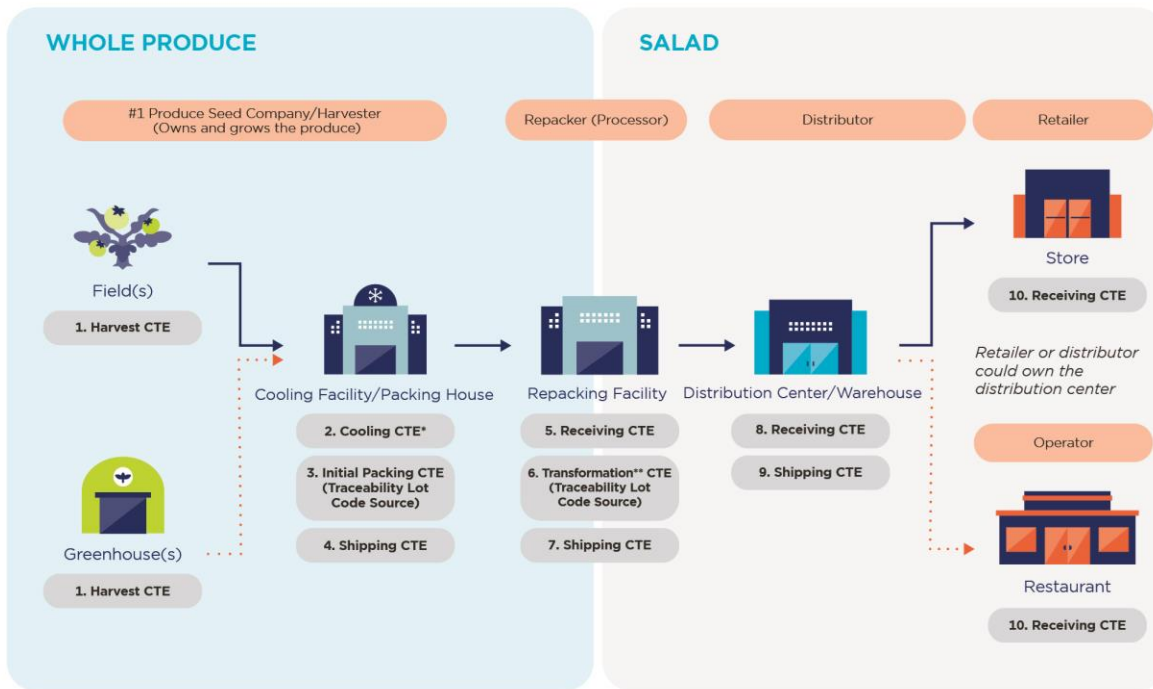


Food Industry Collaboration



Started in November 2021

1. Prioritized supply chain process examples
2. Identified: Parties, Locations & Steps for products
3. Defined FSMA Required CTEs/KDEs
4. Mapped FSMA 204 KDEs to existing GS1 Standard



**Transformation could occur over 1 or more steps

GS1 US FSMA 204 Guideline

Outlines Food Industry best practice to
adopt GS1 Standards and meet FSMA 204
Requirements

Includes FDAs comments and direct links as
well as other foundational resources



FDA Example



[FDA Reference](#)

FSMA 204 Detailed CTEs-KDEs



1. Harvesting
2. Cooling
3. Initial Packing
4. First Land-Based Receiver (*Seafood*)
5. Shipping
6. Receiving
7. Transformation

Food Traceability Rule: Critical Tracking Events (CTEs) and Key Data Elements (KDEs)

FDA U.S. FOOD & DRUG ADMINISTRATION

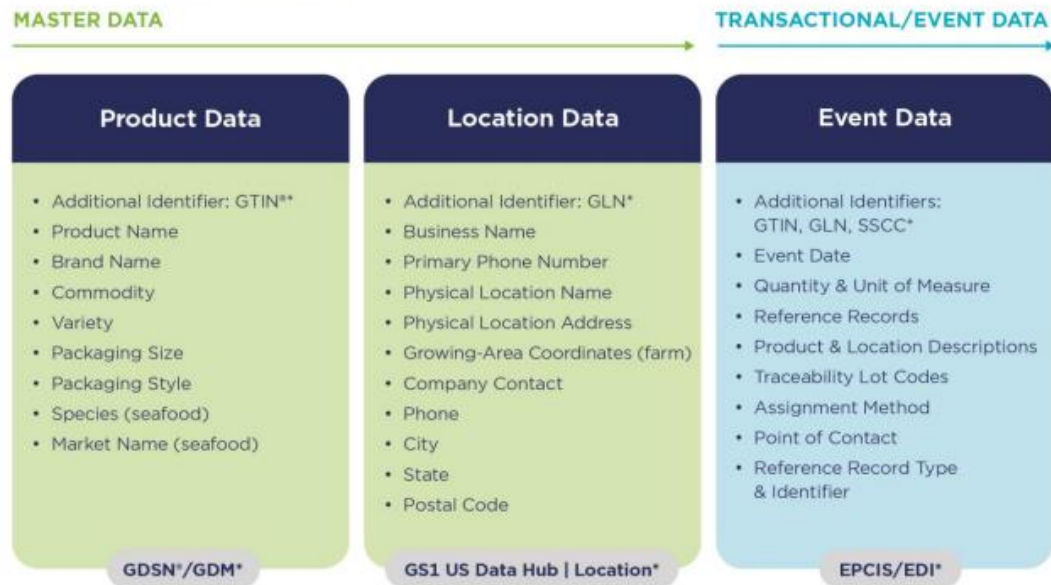
Harvesting	Cooling (before Initial Packing)	Initial Packing (RAC)	First Land-Based Receiver	Shipping	Receiving	Transformation	Traceability Plan
					Receiving KDEs <i>KDEs must be linked to the traceability lot for the food</i> <ul style="list-style-type: none">• Traceability lot code for the food• Quantity and unit of measure of the food• Product description for the food• Location description for the immediate previous source (other than a transporter) for the food• Location description for where the food was received• Date you received the food• Location description for the traceability lot code source or the traceability lot code source reference• Reference document type and reference document number		
					Receiving KDEs <i>For food you receive from a person who is exempt from the rule</i> <i>KDEs must be linked to the traceability lot for the food</i> <ul style="list-style-type: none">• Traceability lot code for the food, which you must assign if one has not already been assigned (does not apply to RFEs or restaurants)• Quantity and unit of measure of the food• Product description for the food• Location description for the immediate previous source (other than a transporter) for the food• Location description for where the food was received (i.e., traceability lot code source) and (if applicable) traceability lot code source reference• Date you received the food• Reference document type and reference document number		

*This section does not apply to receipt of a food that occurs before the food is initially packed (if the food is a raw agricultural commodity not obtained from a fishing vessel) or to the receipt of a food by the first land-based receiver (if the food is obtained from a fishing vessel).

Source: [FDA.gov](https://www.fda.gov)

Master Data & Event Data

Data Framework Example



*Denotes possible use of GS1 Standards for FSMA 204

Identify, Capture, Share



Identification

- **Product**
GTIN
- **Pallet**
SSCC
- **Location/Party**
GLN



Capture

- Data carriers that allow for the addition of lot codes:
- **1D**
i.e., GS1-128
 - **2D**
i.e., GS1 Data Matrix, QR Code with GS1 Digital Link
 - **RAIN RFID**



Share

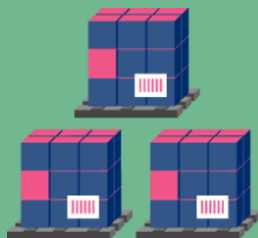
- **Product Data Exchange**
GDSN
- **Location Data Exchange**
Data Hub Location
- **Event Data Exchange**
EDI, EPCIS

GS1 Unique Identification

Assigning unique global product, location, party, and logistic unit identifiers is the foundation of visibility across supply chains.

**GTIN**

Global Trade Item Number® (GTIN®) is used to uniquely identify a trade item.

**SSCC**

A Serial Shipping Container Code (SSCC) is a unique number to identify a logistic unit.

**GLN**

Global Location Number (GLN) is used to uniquely identify a location or stakeholder.



Capture: GS1 Data Carriers



GS1 Data Carriers are capable of holding varying amounts of data to accommodate different needs such as Batch/Lot information and expiration dates.

Barcodes

EAN/U.P.C.



GS1 DataBar®



GS1 DataMatrix



ITF-14



GS1-128



EPC®-Enabled RFID Tags

HF RFID



UHF RFID



GS1 Digital Link

QR Code



Data Matrix



Share: GS1 Data Exchange



Interoperability, made possible by identification standards, data capture standards, and **data exchange standards**, allows product information to flow through the supply chain.

Product Master Data

GDSN®

Global Data Synchronization Network™

The GDSN connects trading partners to the GS1 Global Registry® via GS1-certified data pools, enabling the immediate electronic sharing of standardized, up-to-date, accurate information.

What Goes Into It

- GTINs
- Brand Owner Identification
- Product Descriptions
- Product Classification

Transactional Data

EDI

Electronic Data Interchange

EDI enables the computer-to-computer exchange of structured information between companies using a standardized format.

What Goes Into It

- GTIN®
- GLN
- SSCC

EDI Document Types

- Purchase Order
- Advance Ship Notice
- Invoice
- Payment

Physical Event Data

EPCIS

Electronic Product Code Information Services

EPCIS is the standard for sharing information about the movement and status of goods in the physical world.

What Goes Into It

- What GTIN
- Where GLN
- When Date and Time Stamp
- Why Business Step and Product Disposition

Following the Food Supply Chain



Supplier

Distributor/Restaurant places an order with the supplier.



Supplier's Manufacturing Plant

The supplier's plant packs and labels cases with GS1-128 barcodes.
EPCIS helps capture all ingredients that go into a salad and the final product GTIN, Date, Lot that go into the barcode.



Cases are assembled onto pallets that are labeled with unique Serial Shipping Container Codes (SSCCs) and bound for the retailer/restaurant's distribution center (DC).

Following the Food Supply Chain



The Advanced Ship Notice (ASN) listing the order's Global Trade Item Numbers (GTINs), quantity, and other useful information can be sent to alert the DC of the pending arrival.

The DC can scan the SSCC (if present on the pallet) to compare the information provided on the ASN. If an SSCC is not present, DC scans GS1-128 barcodes on cases for inventory and receiving accuracy.

The DC divides the shipment for delivery to the stores or restaurants that have requested the item—each individual retailer/restaurant is identified by a Global Location Number (GLN). Each delivery is tied to the original supplier's GTIN, date, and batch/lot information.

Following the Food Supply Chain



Retail Store/Restaurant

As shipments of the item arrive in stores, the GS1-128 barcodes can be scanned to manage inventory, address quality complaints, or identify impacted product in case of withdrawal.

GS1 Standards at Work

- Help meet regulatory requirements
- Conduct rapid, targeted recalls
- Customer Trust
- Transparency
- End to End Supply Chain Visibility
- Improved Inventory Management

ROI

Information

- Accurate information drives sales
- Clean data saves time, money, and resources

Product

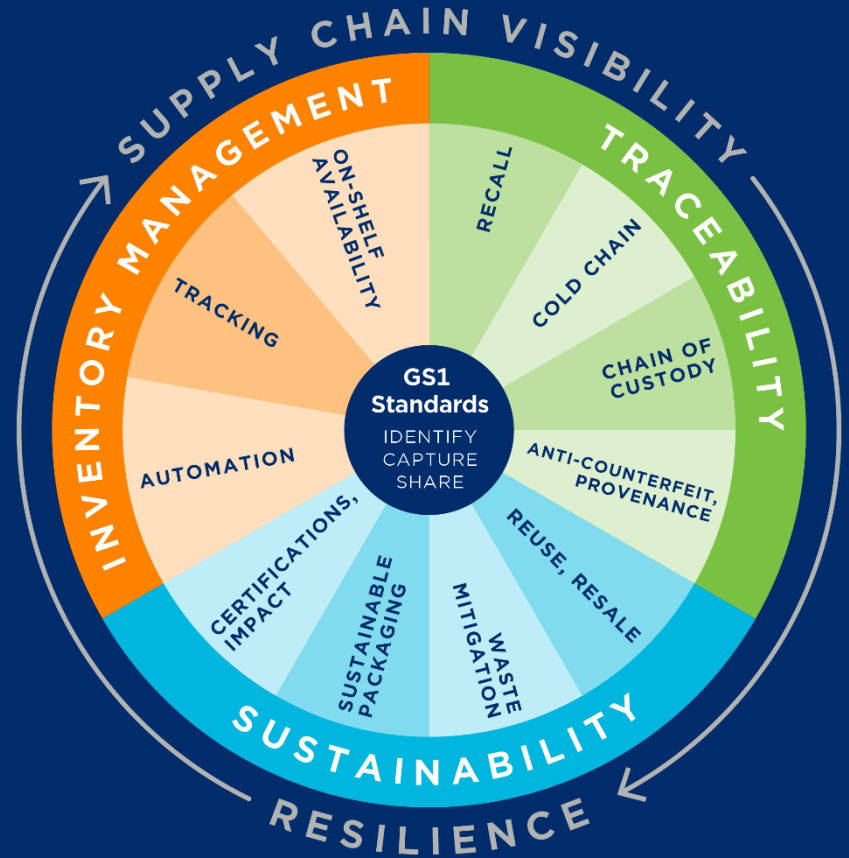
- Less product waste
- Ability to better identify affected lots for recall
- Better freshness management

Process

- Greater efficiency/transparency via automation

Consumer Engagement

- Brand loyalty
- Additional safety



What's Next?



GS1 US

GS1 US FSMA 204 Readiness Checklist

The Global Language of Business

Gain Organizational Support

☐ **Launch Support and Resources Discovery**

- ☐ Secure leadership buy-in and support.
- ☐ Assemble Task Force: RACI (responsible, accountable, consulted, informed).
- ☐ Map out processes, systems, and teams that capture FSMA 204 CTEs/KDEs.
- ☐ Determine trading partners need to be involved.
- ☐ Communicate FSMA 204 requirements with trading partners.

Assess GS1 Standards Capabilities

☐ **Identify Product and Location, Master Data**

- ☐ Survey trading partner's GS1 capabilities and ensure understanding of FSMA 204 requirements.
- ☐ Understand how GS1 Standards can help in meeting FSMA 204 requirements.
- ☐ Confirm if GTINs are assigned to products in the Food Traceability List (FTL) and determined how they will be identified.

**Note: Internal asset identifiers are different than GTINs*

- ☐ Determine if FSMA 204 Product Description KDEs are shared using GDSN or other share method using GDM (Global Data Model) defined attributes.
- ☐ Confirm if companies or locations – where products are processed, manufactured, packed, and held – are identified with GLNs.
- ☐ Confirm if FSMA 204 Location Description KDEs are captured using GLN Data Model attribute formats and definitions. Also, check that they are stored/shared from a single source, such as GS1 Data Hub | Location.
- ☐ Assess your capabilities for the sortable electronic spreadsheet that includes all FSMA-required KDEs for each product and location.

**Note: Examples of systems include Product Information Management Systems, Trading Partner Information Management Systems, and Master Data Management Framework.*

- ☐ Communicate final regulatory deadline to leadership: Jan. 2026.
- ☐ Assign full-time project lead.
- ☐ Look at functions to involve: Operations, Food Safety and Quality, Food Science, Procurement, Logistics, Distribution, Planning, IT, Architecture, Master Data, EDI, Warehousing, Transportation, Account Managers, Business Development, Regulatory Compliance, Legal, Finance, etc.
- ☐ Understand physical/digital data flows and address gaps where new data needs to be captured or shared.
- ☐ Estimate financial requirements.
- ☐ These can be suppliers, distributors, customers, third-party storage providers, etc.
- ☐ Keep in mind those can be domestic or international entities.
- ☐ Align on common goals and deadlines.

Review the following documents for more information:


- ☐ [Guide to GS1 Standards Adoption for Supply Chain Visibility](#)
- ☐ [GS1 Location Checklist Assessment Guide v1.0](#)
- ☐ Review [GS1 US FSMA 204 Resources](#)
- ☐ Assign GTINs as needed and create a list of applicable products (shipped or received).
- ☐ Review [section 3.1.2 of the GS1 US FSMA Guideline](#) for more details.
- ☐ Determine if products identified as "in scope for FSMA 204" for downstream partners are using GDSN Local Code Value or establish how that communication will happen if GDSN is not used. Review [section 3.4.1 Figure 1.4 of the GS1 US FSMA Guideline](#) for more information.
- ☐ Review [section 4.3 of the GS1 US FSMA Guideline](#) for more details.
- ☐ Assign GLNs as needed and create a list of applicable locations (shipped or received). Review [section 3.1.3 of the GS1 US FSMA Guideline](#) for more details.
- ☐ Review [section 4.4 of the GS1 US FSMA Guideline](#) for more information.
- ☐ Identify each department/position responsible for providing each KDE.
- ☐ Assess IT systems/vendor capabilities.
- ☐ Ensure you can store/exchange this information promptly with partners to ensure accurate master data is referenced in all transactions.
- ☐ Evaluate current data governance processes and create new plans as needed.
- ☐ Review [section 4.2.2 of the GS1 US FSMA Guideline](#) for more details.

GS1 US Resources







www.gs1us.org/foodsafety





Food Safety Modernization Act
Resource Center



HOMERETAIL STORESDISTRIBUTION CENTERMANUFACTURINGIMPORTERTransportation FleetPRODUCE GROWERTRACEABILITY

Food Traceability

The following FSMA final rule may impact your company if you manufacture, process, pack, or hold foods that are listed on the Food Traceability List (FTL) or foods that contain listed foods as ingredients.

Food Traceability

Food Traceability Final Rule: [Requirements for Additional Traceability Records for Certain Foods](#) (*published November 15, 2022*)

Key Requirements: The FDA Food Traceability Final Rule establishes traceability recordkeeping requirements for persons who manufacture, process, pack, or hold foods included on the Food Traceability List (FTL) or foods that contain listed foods as ingredients.

Compliance Date: January 20, 2026

Food Traceability List: [Food Traceability List](#) (*November 15, 2022*)

FDA Related Resources:

- [FDA Traceability Resources Related to Food Traceability Final Rule](#)
- [FDA Frequently Asked Questions about the Food Traceability Final Rule](#)
- [FDA's New Era of Smarter Food Safety Blueprint](#)

FMI Final Rule Resources:



How to get started



Up next in series

- **August 16:** The Why: Driving Business Value Beyond FSMA 204 Regulatory Compliance
- **August 23:** The What's Next: Preparing to Meet FSMA 204 Requirements - Tools and Resources
- **August 2:** The What: Understanding the Basics of FSMA Rule 204: [Webinar recording](#)



Questions



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