ReposiTrak

OnTrak Webinar Series

November 4, 2021

FSMA Rule 204: Traceability Traps to Keep in Mind

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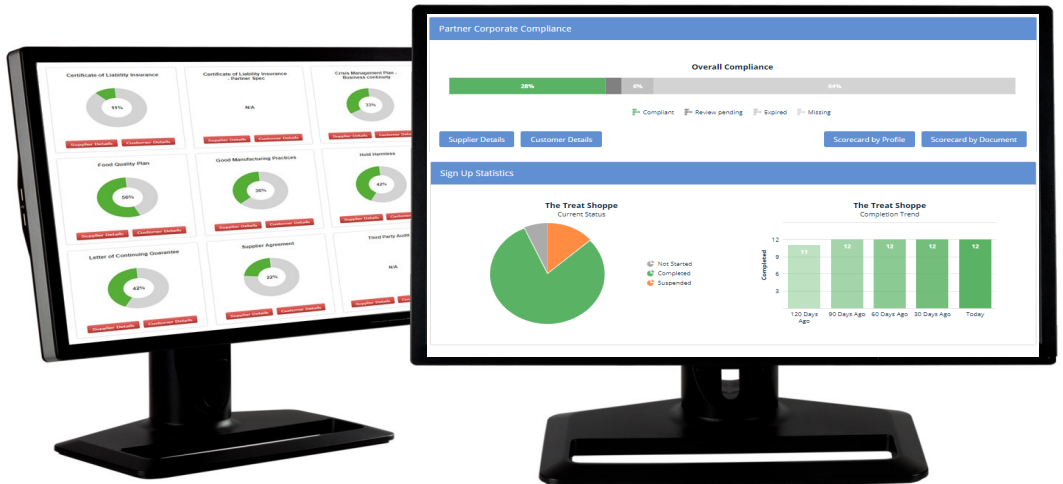
World's Largest Network of Supply Chain Partners Sharing Documents and Data

Improve Product Safety, Reduce Cost & Risk

More than 100,000+ connections

in the ReposiTrak network

used in 100+ countries



ReposiTrak

Many of you and your suppliers are likely already using ReposiTrak to share documents with customers

Exclusively Endorsed in the Industry

FMI THE FOOD INDUSTRY ASSOCIATION

ReposiTrak augments our food and drug safety efforts…with a **proven, comprehensive and easy- to-implement solution** that **doesn't require systems changes** and is extremely cost effective.

ROFDA™ Retailer Owned Food Distributors & Associates

We see the ReposiTrak system becoming an **industry standard** for the retail supply chain, helping all trading partners **meet the new federal food safety requirements**, reducing unsalable products and keeping the end consumer healthy.

SQF

We were looking for a technology partner to help us **raise the bar** not only with our data management and reporting, but also with upgrades to all of our user interfaces. It made perfect sense to partner with ReposiTrak because of their **experience in the industry** and technical capabilities.

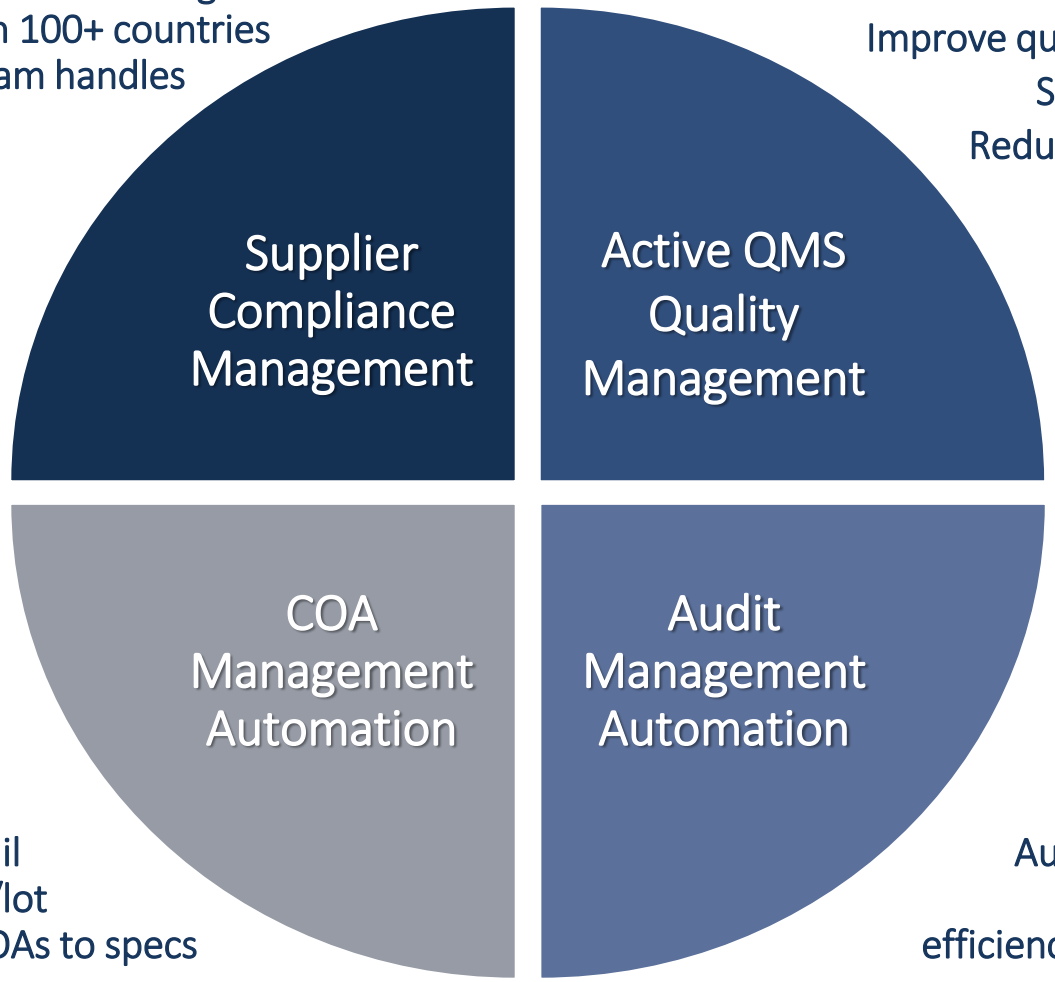
We Know You're Busy, So Our Team Does the Heavy Lifting for You

- **Cloud-based**
  - Nothing to install, just use your browser
- **We do all the supplier follow-up for you!**
  - It takes up to 20 "touches" by phone, e-mail and mail on average to get and keep a supplier compliant
  - We have a full-time, U.S. based, multi-lingual Customer Success Team who follow-up with your vendors to ensure adoption and compliance with your requirements
- **Set-up is easy**
  - Your supplier list and document requirements are all we need to get started

ReposiTrak is Now the Most Complete Compliance & Quality Management Solution

World's largest document sharing network
100,000+ locations in 100+ countries
Customer success team handles supplier follow-up

Automate internal forms & quality records
Improve quality management
Save time & money
Reduce audit prep time



Collect COAs via email
Track COAs to batch/lot
Auto-validation of COAs to specs

Automate internal & supplier audits for efficiency and consistency

Food Traceability Leadership Consortium

Leadership in traceability

- Created a methodology
- Adopted principles of an optimal solution
  - Minimal Cost
  - Easy to adopt, use and verify
  - Meet or exceed FDA proposed regulation
- Create a Framework
- Review possible solution

FSMA RULE 204

Traceability Traps to Keep in Mind

Jennifer Crandall
CEO/Founder
Safe Food En Route, LLC

BRIEF UPDATE ON FSMA & FSVP

VQIP

FSVP

FDA New Era Food Safety Summit on E-Commerce

4 KEY LEARNING POINTS

- Document collection for Compliance
- Successful ways to overcome obstacles
- Traceability Rule’s impact on data overall in the Supply Chain
- Automation is ideal

DOCUMENT COLLECTION FOR COMPLIANCE

POLL QUESTION 2

Legal Documents

Financial

Sustainability Documents

Food Safety

Brand Compliance

Social Responsibility

Receiving/Shipping Paperwork

S|F

Audit Certificates & Full Reports

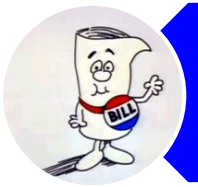
FDA or USDA inspections

HACCP / Food Safety Plans

Specifications / Labels

Policies / Procedures

Purchase Orders



Bills of Lading / Pack Slip

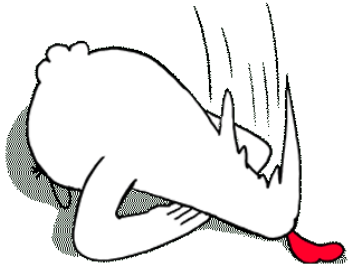
Pallet Labels & ID

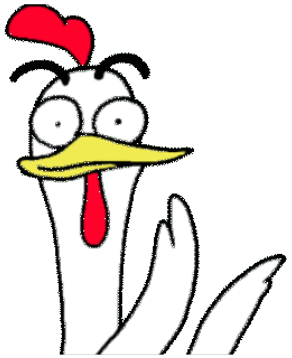
Seal Information

COA

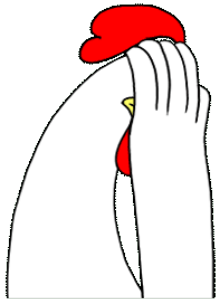
OBSTACLES COLLECTING SUPPLIER DOCUMENTS & WAYS TO OVERCOME THE HICCUPS

POLL QUESTION 3

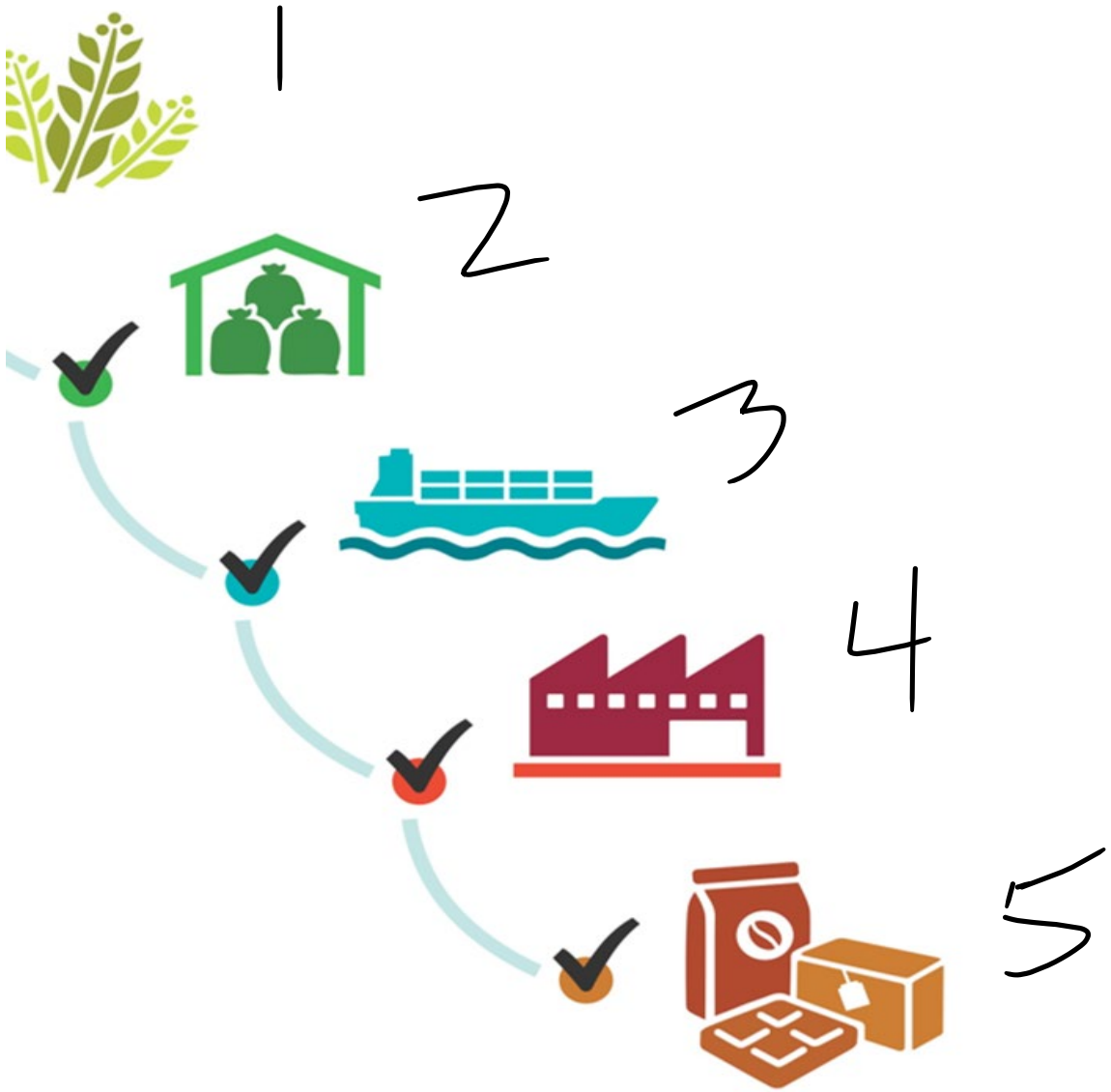




Supply Chain
Communication Trap



What is the Supply Chain Communication Trap?



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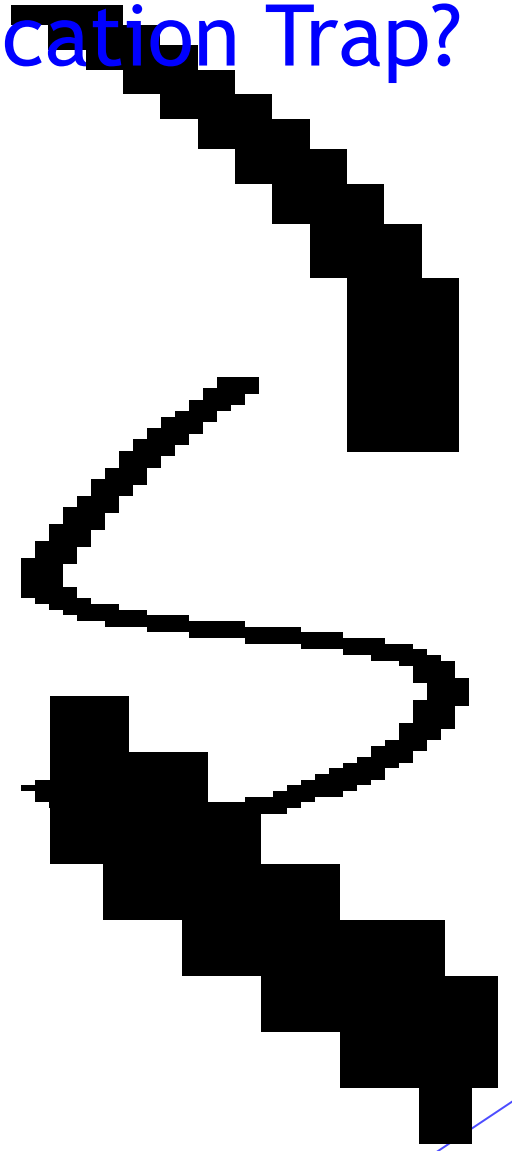


What Is the Supply Chain Communication Trap?

POLL QUESTION 4

SUCCESSFUL WAYS TO OVERCOME HICCUPS

Avoid the Merry Go Round……

- Build Relationships
- Go Digital
- Ensure Chain of custody
- Data Consistency
- Document Request Consistency
- Utilize available standardization
- Translations

Traceability Rule's impact on data overall in the Supply Chain

FSMA Section 204

Proposed Rule Imposes Massive Data Management Issues across the Supply Chain

Food Traceability List (FTL):

- Cheeses, other than hard cheeses (less than 39% moisture)
- Shell eggs
- Nut butters
- Cucumbers (fresh)
- Herbs (fresh)
- Leafy greens (fresh), including fresh-cut
- Melons (fresh)
- Peppers (fresh)
- Sprouts (fresh)
- Tomatoes (fresh)
- Tropical tree fruits (fresh)
- Fruits and Vegetables (fresh-cut)
- Finfish, including smoked finfish
- Crustaceans
- Mollusks, bivalves
- Ready-to-eat deli salads

FDA updates since July 2021 and still considering comments

S|F

KDE (Key Data Elements)

CTE (Critical Tracking Event)

Chain of Custody KDE

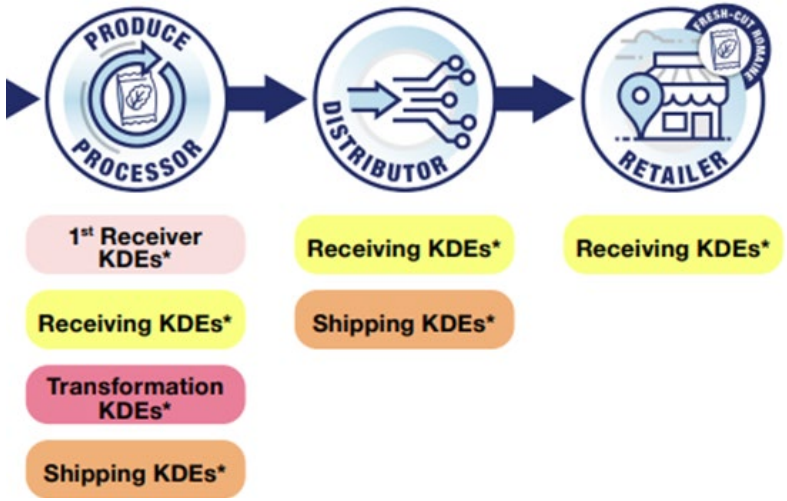
Reference Record

Traceability Lot Code

Traceability Product Description

WHAT COLOR IS THIS BOX?

- Tiffany Blue
- Robin Egg Blue
- Turquoise
- Hex Code #0ABAB5
- Teal
- Aqua Blue
- Aqua Marine
- Tame Teal
- Belize
- Misty Teal
- Tropicana Cabana
- Spanish: Turquesa
- French: Sarcelle
- Italian: verde acqua
- German: blaugrun
- ETC….



Their Receiving KDE is NOT the same as your Shipping KDE

Receiving KDEs*

- Traceability Lot code
- Immediate previous source location identifier and description
- Port of entry number (if imported)
- Receiver Location identifier and description (Facility)
- Receipt Date and Time
- Quantity received and unit-of-measure
- Product identifier and description of product received
- Traceability lot code generator location identifier, description and Point of Contact (POC)
- Reference record types(s) and #(s) for documents containing receiving KDE's
- Transporter Name

Shipping KDEs*

- Lot Code(s)
- Entry number(s) – when imported
- Quantity and unit-of-measure of the food
- Product identifier and product description
- Traceability lot code generator location identifier, description and POC
- Immediate subsequent recipient location identifier and location description
- Shipping location identifier and description
- Shipping date and time
- Shipment reference record type(s) and #(s) containing Shipping KDE's
- Transporter name

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You Store/Send Information One Way Your Customer will Want it Another Way

As a supplier with multiple customers (dozens? hundreds? more?) you are required to forward SHIPPING KDEs to your customers.

They will all want your SHIPPING KDEs in a form and format that's easy for them to process, not necessarily easy for you to send.

How will you handle the data and records management challenge and keep your customers happy?

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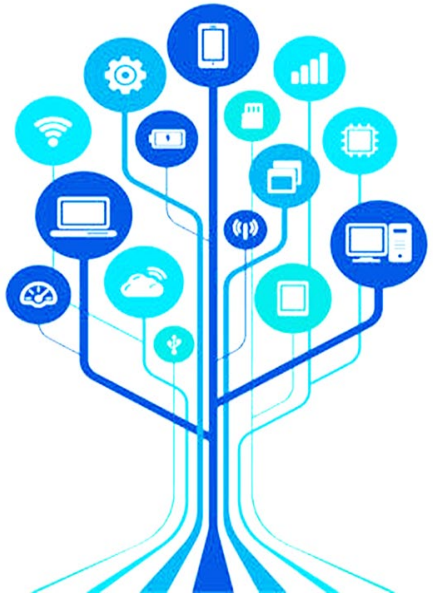
REFERENCE RECORD REQUEST

Date	Product Code	Product Description	Volume	Units
11/4/2021				

Product Code	Product Description	Date Sent	Volume	Units
		Nov 4, 2021		

11/4/2021

Nov 4, 2021



Automation and Partners are Ideal

For Compliance & for Traceability

Automation is Key

Supplier Information

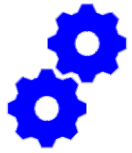
Supplier Food Safety Programs

Product Specifications/Nutritional Info/Labels

Raw Material Specifications/Nutritional Info

Monitoring/Surveillance

Policies/Procedures/Digital Forms



Systems Integrations

HOW TO PREPARE FOR FSMA rule 204

- Identify FTL foods in raw materials
- Identify Traceability Product identifier & Descriptions
- List Reference Records and how linked to data
- State on records where to find data
- Summarize how you establish the codes & capture them

SUMMARY

If you are under the FSMA Section 204, make digitalization of your traceability KDE and CTE a priority in 2022

POLL QUESTION 5 & 6

Questions

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