



## Food Traceability Rule (FSMA 204) FAQ

UNFI is deeply committed to food safety and regulatory compliance, and we strive for excellence by driving continuous improvements. Our food safety vision is to have a world class food safety management system that achieves the highest level of industry standards and exceeds consumer expectations. To support you as our industry prepares for the *Food Traceability Rule*, we've compiled a list of frequently asked questions.

### **What is FSMA and how is it related to the Food Traceability Rule?**

FSMA stands for *Food Safety Modernization Act*, which is a law that modernized U.S. food safety standards and was passed in 2011. The new FSMA Rule 204 is a supplemental rule within the *Food Safety Modernization Act*. It is also called the *Food Traceability Rule*.

### **What is the Food Traceability Rule?**

The Federal Food and Drug Administration (FDA) is requiring all companies that hold, pack, or sell foods to keep detailed records for a specific list of foods. This new rule will go into effect on January 20, 2026, and the FDA will begin routine inspections in January 2027. This regulation is designed to improve the industry's response to food safety incidents by enabling the supply chain to quickly identify sources of contamination and remove implicated food products from commerce. In line with FSMA, the goal is to prevent foodborne illness and death, and to enhance consumer confidence in America's food system.

### **Who is impacted by the Food Traceability Rule?**

All supply chain partners – UNFI, retailers, and suppliers – will be impacted by this rule. Food traceability, in general, is the ability to follow the movement of food ingredients and products throughout the supply chain. The *Food Traceability Rule* will require strong collaboration with our supply chain partners to ensure effective tracking, maintaining, and storing of data.

### **What are the requirements of this rule?**

The *Food Traceability Rule* requires tracking of commodities on the Food Traceability List (FTL), which contains items that the FDA has deemed high-risk or commodities with a high probability of being recalled. Tracking is required for single- and multi-ingredient products. You can find the entire FTL [here](#). Please note that the FTL will likely change or expand every five years.

This rule will require accessible, accurate data with structured, standardized processes of retrieval and storage. Specific data associated with commodities on the FTL will need to be captured. This includes but is not limited to when and where each item was shipped along with Traceability Lot Codes (TLCs) and other Key Data Elements (KDEs). Organizations must retain this data for two years and must be able to share it with the



FDA within 24 hours of the FDA’s request. The ability to capture and share standardized data along the supply chain will be important for compliance.

### **Where is UNFI today regarding compliance?**

We are now updating our internal processes and systems to comply with the *Food Traceability Rule* once in effect. We’re also reviewing different third-party technology solutions on the market to assist with our compliance. We’ve been talking with these technology providers to better understand their capabilities and determine how different solutions will support UNFI and our supply chain partners. At this time, UNFI has not subscribed to or endorsed any commercial, third-party traceability solution provider.

### **How is UNFI partnering with industry associations, such as the National Grocers Association (NGA) and the Food Industry Association (FMI), to prepare for this rule?**

UNFI is working with NGA and FMI to advocate for necessary improvements to the rule with key policymakers in Congress and at the FDA. Additionally, UNFI meets with FMI regularly and is a member of their Food Policy Committee’s Traceability Workgroup. We will continue to provide our subject matter expertise and learnings to support FMI’s efforts to find proven industry-wide solutions that allow for full compliance.

### **How is UNFI partnering with the Food and Drug Administration (FDA) to prepare for this rule?**

UNFI is working with the FDA to prepare for compliance and continues to engage with senior FDA officials to share compliance challenges and learnings. We have hosted FDA leaders at our distribution centers to illustrate the complexities of our distribution network and to address challenges as we work through implementation. We will continue to advocate for federal legislation, such as the *Food Traceability Enhancement Act*, that requires the FDA to sanction food traceability pilots and delay implementation until those pilots are complete. We believe this is critical to ensure our industry can share information about workable solutions and align on uniform data standards.

### **Is UNFI able to provide a list of items that are included on the Food Traceability List?**

As part of the *Food Traceability Rule*, the responsibility to identify items on the Food Traceability List starts with the manufacturer of the product. Similar to how a manufacturer may declare products “Organic” or “GMO-Free,” it is also their responsibility to declare items on the Food Traceability List.

However, UNFI is taking an additional step in surveying suppliers to help them identify their items on the Food Traceability List, although the responsibility is ultimately with them. Engagement between UNFI and our suppliers started in Dec. 2024 and will conclude in early spring 2025. We will share this information with customers as it is deemed appropriate.



### **What are UNFI's data sharing requirements?**

Data tracking, maintenance, and storing will require strong collaboration with our supply chain partners. Although our specific and detailed data sharing requirements will be shared in early 2025, we have core components that both suppliers and retailers can start preparing to use:

- We will use a Traceability Portal to submit digital Key Data Elements (KDEs), or customers who currently use Electronic Data Interchange (EDI) will submit via Advance Shipping Notifications (ASNs).
- We will also use physical forms to transfer KDEs, including bills of lading, pallet tags, and case labels.
- Suppliers should start leveraging GS1 standards for item and case identification.

Again, we will share specific requirements in early 2025, and more information on a Traceability portal in spring 2025.

### **How will UNFI communicate about *Food Traceability Rule* updates in the future?**

You can expect to receive more information from your Account Manager or your Supplier Relationship Manager. UNFI will also use its official communications channels to share routine updates on progress. You can expect to see updates via the following sources:

- [UNFI Traceability site](#)
- myUNFI NewsCenter – located on the myUNFI dashboard
- Customer Edge and Supplier Insider emails
- UNFI Selling Shows: Please visit our Food Traceability Booth at our San Diego and Orlando Spring and Summer shows to learn more about the *Food Traceability Rule*.
  - San Diego: Booth 731
  - Orlando: Booth 317

### **Where can I submit questions about the Food Traceability Rule?**

If you have additional questions, email [FoodTraceability@unfi.com](mailto:FoodTraceability@unfi.com) and our team will respond.

### **Helpful Resources:**

- [FSMA 204 Final Requirements for Food Traceability](#)
- [GS1 Application of System of Standards to Support FSMA 204](#)
- National Grocers Association member access: [NGA Traceability Center](#)
- Food Industry Association member access: [FSMA Resource Center](#)