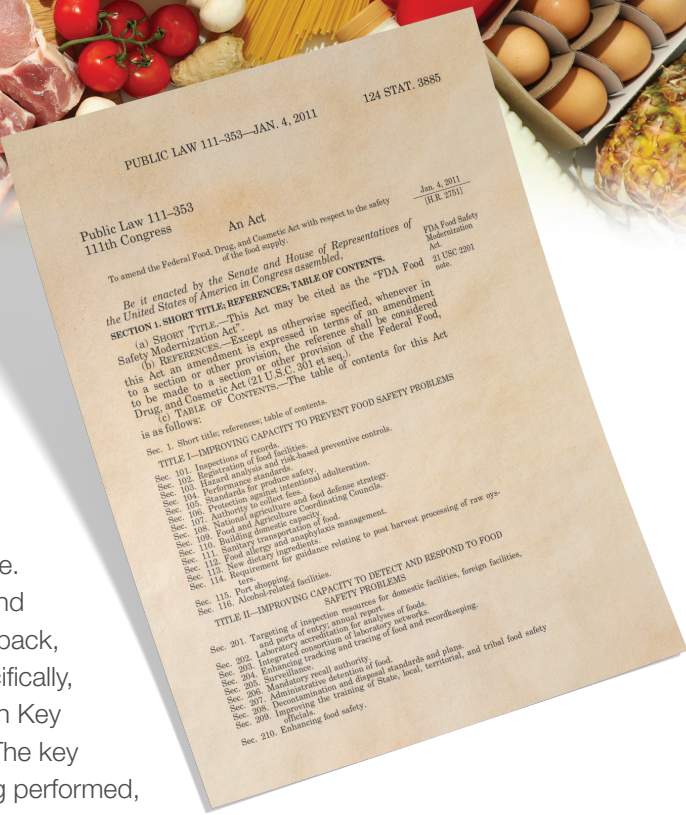




Partner with DeltaTrak® to Comply with FSMA 204 Traceability Rule

FlashTrak Chain of Custody provides the FSMA compliance program to help our customers comply with the FDA's new food traceability rule. FSMA 204 "establishes traceability recordkeeping requirements beyond those in existing regulations, for persons who manufacture, process, pack, or hold foods included on the Food Traceability List (FTL)". More specifically, the new FSMA rule requires the maintenance of records which contain Key Data Elements (KDE) associated with Critical Tracking Events (CTE). The key data elements required will depend on the critical tracking event being performed, namely harvesting, cooling, initial packing of a raw agricultural commodity, first land-based receiving of a food obtained from a fishing vessel, shipping, receiving, and transformation of the food. The rule covers companies based in the United States and foreign concerns producing food for US consumption. Non-compliance with traceability requirements is a prohibited act, subject to criminal prosecution, injunction, and suspension or revocation of food facility registration. A partial list of FSMA 204 requirements follows.



Traceability Plan

- Description of the procedures used to maintain the required records
- Description of the procedure used to identify foods on the FTL
- Description of how traceability lot codes are assigned
- Statement identifying point of contact for questions regarding the plan
- Farm map showing the areas where FTL foods are grown or raised

Shipping and/or Receiving Key Data Elements (KDEs) for All Foods on Food Traceability List (FTL)

- Traceability lot code (a unique descriptor used to identify a traceability lot within the records of the firm that assigned the code)
- Quantity and unit of measure
- Product description
- Location description for immediate subsequent recipient
- Date shipped/received
- Location description for traceability lot code source or reference
- Reference document type and reference document

Transformation Key Data Elements (KDEs) for All Foods on the Traceability List (FTL)

- Traceability lot code
- Location description for where you transformed food
- Date transformation was completed
- Product description
- Quantity and unit of measure
- Reference document type and reference document number

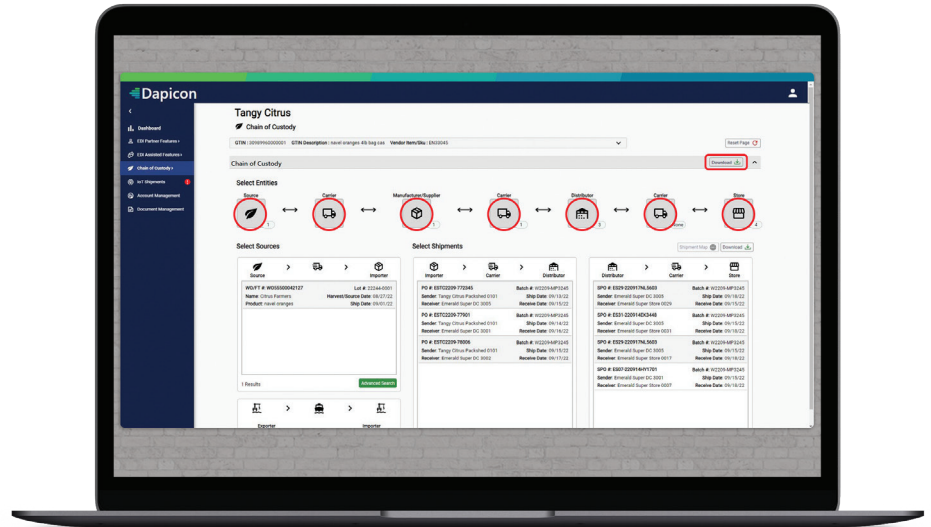
Records Maintained in Original Paper or Electronic Format or True Copies

- The FDA will conduct routine records inspections to ensure that entities are complying with FSMA 204 requirements.

All Records (KDEs) Provided to the FDA within 24 Hours of a Request

- The records must include any information needed to explain the records, including coding systems, glossaries, abbreviations, and description of how the records correspond to the FDA request.

Electronic Sortable Spreadsheet Provided to FDA within 24 Hours of Request During an Outbreak, Recall or Other Public Health Threat



For companies ill-equipped and ill-prepared to comply with the FSMA 204 final rule, the responsibility of consistently maintaining potentially thousands of records could prove overwhelming.

Flashtrak Chain of Custody is The Solution of Choice for Tech-Enabled FSMA 204 Compliance

The FDA identifies FSMA 204 as “a foundational first step on the path to promoting tech-enabled end-to-end traceability for all foods.” FlashTrak Chain of Custody offers cost-effective compliance with the new traceability rule, without requiring an investment in expensive technology or additional labor.



FlashTrak Chain of Custody, built on the Dapicon ecosystem, leverages 30 years of food industry experience and expertise.

- Utilizing transactional data from contributing supply chain partners, including buyers, sellers, third-party logistics companies, government agencies, marine traffic companies, and other third-party providers, FlashTrak Chain of Custody creates end-to-end traceability and enables retailers, wholesalers, and suppliers to meet FSMA 204 requirements.

FlashTrak Chain of Custody identifies all previous custodians, their locations, when they took possession of a product and when that product left their possession.

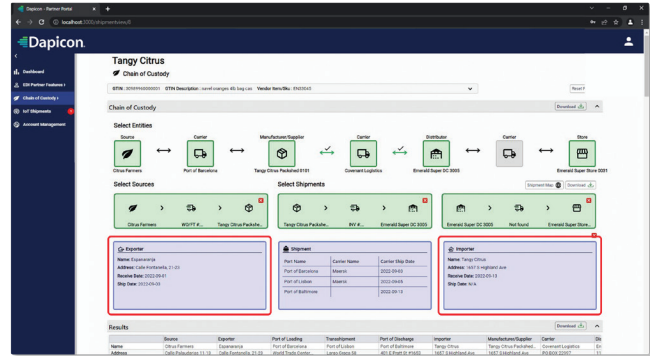
FlashTrak Chain of Custody is a one-stop shop for accessing FSMA 204 data, enabling stakeholders to utilize one platform to obtain KDEs, instead of piecing together information from multiple systems.

- At the Chain of Custody customer interface, users can search shipments by entering a product ID (such as a GTIN or UPC), lot number, batch number, purchase order number, invoice number, or shipment number. The resulting data can be downloaded to a spreadsheet, giving you the KDEs required for FSMA 204 compliance.

FlashTrak Chain of Custody extracts KDEs from Electronic Data Interchange (EDI) transactions, Produce Traceability Initiative (PTI) data, and other vital information.

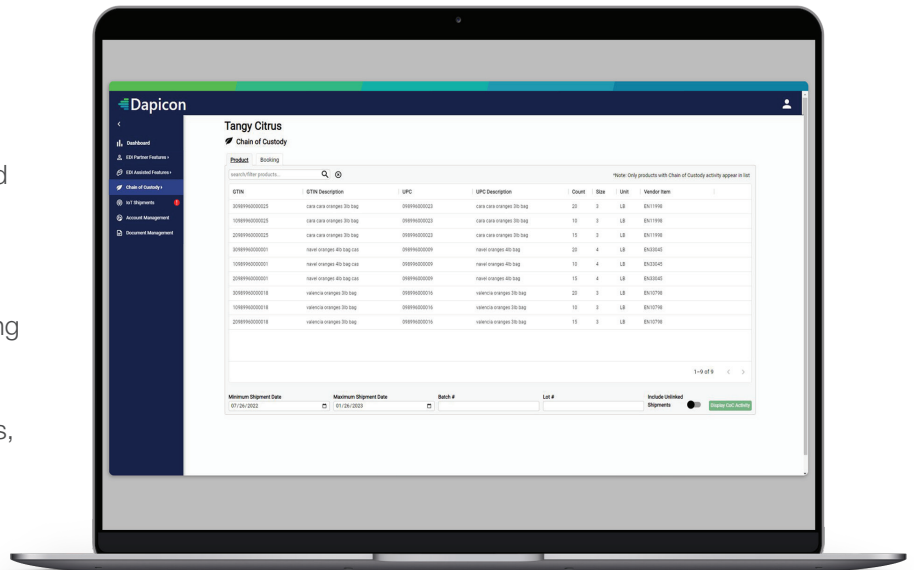
- **EDI** - Whether you use EDI or API to exchange information with your trading partners, FlashTrak Chain of Custody connects data sets to seamlessly extract the key data elements (KDE) needed for your FSMA record-keeping.
- **PTI** - As products move through the supply chain, each time a barcode is scanned it gives users the necessary date/time stamp, case identifier, lot and/or batch #, and other key information needed for FSMA compliance.
- Other data include temperature information captured from in-transit loggers and marine traffic information from export shipments.

Chain of Custody tracks international shipments using booking confirmations, purchase order numbers and master bills of lading.



FlashTrak Chain of Custody provides reference information for certain key activities depending on the supply chain participant.

- **Growers** - Chain of Custody provides lot numbers, contact information, work orders/field tickets, commodity, variety, harvest date, and location.
- **Exporters and Importers** - Chain of Custody provides name and contact information, booking confirmation number, haulage carrier, port of loading, port of unloading, transshipment information, bill of lading information, ETD/ETAs, BOL numbers, vessel/flight information, and many other data points.
- **Shippers** - Chain of Custody provides contact information, invoice number, purchase order number, quantity, GTIN, UPC, batch number, ship date, arrival date, ship-from location information, ship-to location information, order details, etc.
- **Carriers** - Chain of Custody provides contact information, bill of lading number, ship date, arrival date, ship-from, ship-to, purchase order number, contents of shipment, SCAC and PRO numbers.
- **Distributors and Individual Stores** - Chain of Custody can provide ship-from and ship-to locations, ship dates, arrival dates, quantities, GTIN and/or UPC, lot/batch number, and store PO number.
- All of the above information can be downloaded to a spreadsheet for FSMA 204 compliance.



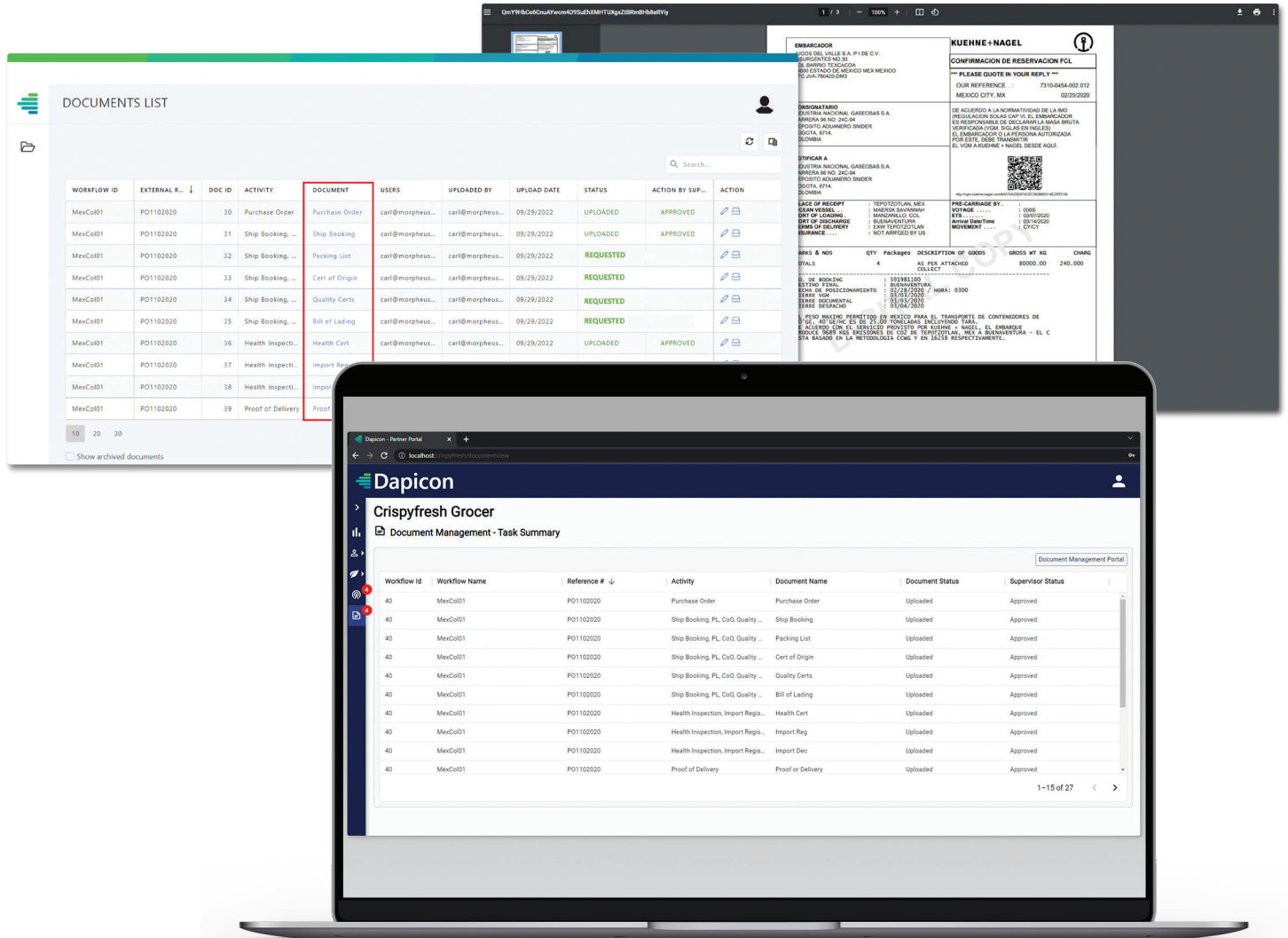
FlashTrak Chain of Custody helps users manage FSMA 204 document collection.

- A workflow process can be created that identifies which documents are needed, when they are needed, and who is responsible for obtaining them.
- An email notification will be sent to the accountable person at various intervals to remind them to upload the appropriate document. Once uploaded, the status of the document will automatically be updated.

Morpheus Network Document Management

DeltaTrak is pleased to announce the inclusion of Morpheus Network on our Chain of Custody platform.

- Morpheus utilizes “legacy and emerging technologies” to automate the timely collection of supply chain documentation, including those for international shipments and FSMA compliance.
- By partnering with this supply chain SAAS provider, we can offer comprehensive management of all FSMA related documents. Users can organize and group documents in a way that is meaningful to them.
- Any document a user is required to retain or provide for FSMA compliance purposes (e.g. traceability plan, audit certification, phytosanitary document, etc.) is collected, stored and available when needed.



For more information on FlashTrak Chain of Custody, please contact your DeltaTrak account manager, or call Sales at 800-962-6776, Option 1.

