

Dear Gordon Food Service<sup>®</sup> Supplier,

The US Food and Drug Administration’s (FDA’s) [Final Rule on Requirements for Additional Traceability Records for Certain Foods](#) that was originally planned to take effect on January 20, 2026 is now postponed, with a new compliance date of **July 20, 2028**. The rule requires entities to maintain records containing specific “key data elements” (KDEs) when they engage in “critical tracking events” (CTEs) regarding foods listed on FDA’s [Food Traceability List](#) (FTL) or foods that contain FTL foods as ingredients (collectively, FTL foods). Entities engaging in certain activities at specified points in the supply chain will be required to assign a unique “traceability lot code” (TLC) to each FTL food, and subsequent entities in the supply chain will need to link KDE records to the food using the food’s TLC.

The below guidelines are applicable to all suppliers providing foods on the Food Traceability List to Gordon Food Service U.S. distribution business, including suppliers outside of the U.S., and suppliers providing drop ship or Expanded Product Offering (EPO) food to Gordon Food Service U.S. customers.

The following foods are currently listed on the FDA’s Food Traceability List:

Cheeses, Other than Hard Cheeses	Shell Eggs	Nut Butters	Cucumbers (fresh)	Herbs (fresh)
Leafy Greens (fresh)	Melons (fresh)	Peppers (fresh)	Sprouts (fresh)	Tomatoes (fresh)
Tropical Tree Fruits (fresh)	Fruits (fresh-cut)	Vegetables (fresh-cut)	Finfish (fresh and frozen)	Smoked Finfish (refrigerated and frozen)
	Crustaceans (fresh and frozen)	Molluscan Shellfish, Bivalves (fresh and frozen) (unless exempt per § 1.1305(f))	Ready-To-Eat Deli Salads (refrigerated)	

As a supplier of a FTL food product to Gordon Food Service’s U.S. distribution business, you will be required to pass forward the following “shipping” KDEs to Gordon Food Service for each FTL food you supply:

- The product’s traceability lot code.
- The quantity and unit of measure.
- The product description.
- The location description for the immediate subsequent recipient, for where the food was shipped, and for the traceability lot code source or traceability lot code source reference.
- The date of shipment.

To fulfill these requirements, and to ensure that foodservice distributors can fulfill their own regulatory obligations, we ask that you follow the steps below. Your compliance with these industry best practices will allow us to share traceability data electronically in a manner that is sustainable for both of our businesses.

1. **Determine whether your operations are exempt from the Traceability Rule.** Please notify Gordon Food Service of this determination, and then as necessary on an ongoing basis (e.g., with each shipment or as part of your master data). In the rare case that you conclude that your operations are exempt, we will expect you to notify Gordon Food Service of that conclusion and identify the basis for that conclusion in writing. We will presume that any suppliers who do not provide such notifications are subject to the rule.
2. **Identify which items you send to Gordon Food Service are on the Food Traceability List.** Identifying these items through a Global Data Synchronization Network provider is the most efficient process and highly recommended. More details on the GDSN field used to identify FTL items can be found on the [GS1 US Regulatory Act code list](#). If you are not currently publishing item data through a GDSN provider and would like more information, please reach out to [gdsn@gfs.com](mailto:gdsn@gfs.com).
3. **Pass forward shipping KDE records for each FTL food you supply.** In doing so, you must comply with the following expectations:
  - a. Provide the shipping KDEs in electronic format via advanced ship notice 856 (ASN 856) *before* the delivery date (Contact [edi.vendor.onboarding@gfs.com](mailto:edi.vendor.onboarding@gfs.com) if you have questions specifically regarding ASN adoption).
  - b. Clearly identify the TLC for each FTL food and use a standardized TLC format across shipments.
  - c. Clearly identify each individual KDE and use a standardized format for KDEs across shipments.
  - d. Ensure that all shipping KDE records are complete and accurate.
4. **Label cases with GS1-128 or approved alternative barcode with TLC encoded**
  - a. Place data carriers that encode to the TLC and the TLC source or TLC source reference (e.g., barcodes, QR codes,) on two adjacent sides of all packages, unless otherwise agreed upon.
  - b. Use GS1 application identifier 10 (AI 10) to identify the TLC.
  - c. This is critical, as GFS will be using this labeling to ensure our compliance to the rule on the outbound side.
5. **Timeline** - As a company, we need to be prepared well in advance of the compliance date. As such, please ensure that your company is working towards the action steps above and stay tuned for more communication on when GFS will expect to start receiving the KDEs.

Please also visit the Food Safety Quality Assurance page on Gordon Food Service's supplier portal [Gordon Supplier Plus](#) to learn more about the rule and how we will work together to ensure compliance to the rule. Please submit your questions, comments and exemption status with us by filling out [THIS FORM](#). We will route your inquiry to the appropriate parties and be back in touch with you as soon as possible.

If you have questions regarding your company's obligations under the rule, we recommend consulting with your legal counsel or regulatory compliance team.

Sincerely,



Todd Baker  
Executive Vice President, NA Merchandising



Alisha Cieslak  
Chief Legal & Risk Officer