



December 1, 2023

Re: The Kroger Co Food Traceability Policy & Requirements

Dear Valued Supplier,

The Kroger Co (“Kroger”) is working diligently to implement FDA’s Food Safety Modernization Act, Section 204(d), also known as FSMA 204. FSMA 204 establishes traceability recordkeeping requirements, beyond those in existing regulations, for persons who manufacture, process, pack, or hold foods. The requirements in the Final Ruling allow for faster identification and rapid removal of potentially contaminated food from the market, resulting in fewer foodborne illnesses and/or death. Ensuring the safety of food supply for our customers is a shared responsibility across our supply chain network.

As a Valued Supplier, **Kroger needs you to take the following steps** to ensure we meet the interoperability requirements with your company:

- (a) Adhere to Kroger’s EDI 856 ASN guideline – document can be found on [edi.kroger.com](http://edi.kroger.com), [Kroger EDI 856 Specifications](#).
- (b) Transmit an EDI 856 ASN document for every shipment of products to any Kroger facilities.
- (c) Align your logistic unit requirements to match *Attachment A: Kroger Track and Trace Supply Chain Receiving Specifications*.
- (d) Certify palletized barcode labels on the physical products arriving at the receiving dock correspond to the EDI 856 ASN data transmission.

Kroger acknowledges the FDA guidance, the Final Rule, titled “Requirements for Additional Traceability Records for Certain Foods” published on November 21, 2022. However, Kroger intends to collect and record Traceability information for all food products entering Kroger facilities, to ensure the safety of food supply for every customer.

By taking these steps, Kroger believes we are taking the appropriate actions to ensure both our companies will satisfy the FDA’s Final Rule requirements. To be FDA compliant by January 20, 2026, Kroger is requiring that all suppliers agree to these alignment steps (a), (b), (c), and (d) above and complete transition by June 30, 2025.

Thank you for your continued partnership to protect the customers we serve every day! Please contact [FoodTraceability@kroger.com](mailto:FoodTraceability@kroger.com) with any questions.

Best Regards,

Stuart Aitken  
SVP & Chief Merchandising & Marketing Officer

Gabriel Arreaga  
SVP Supply Chain, Manufacturing & Sourcing



## Attachment A

### Kroger Product Suppliers Track and Trace Supply Chain Receiving Specifications Released September 20, 2023

Below outlines Kroger’s approach to enabling Food Traceability, we focus on the three key data enablers: Purchase Order, Advance Ship Notice (ASN), and corresponding palletized barcodes.

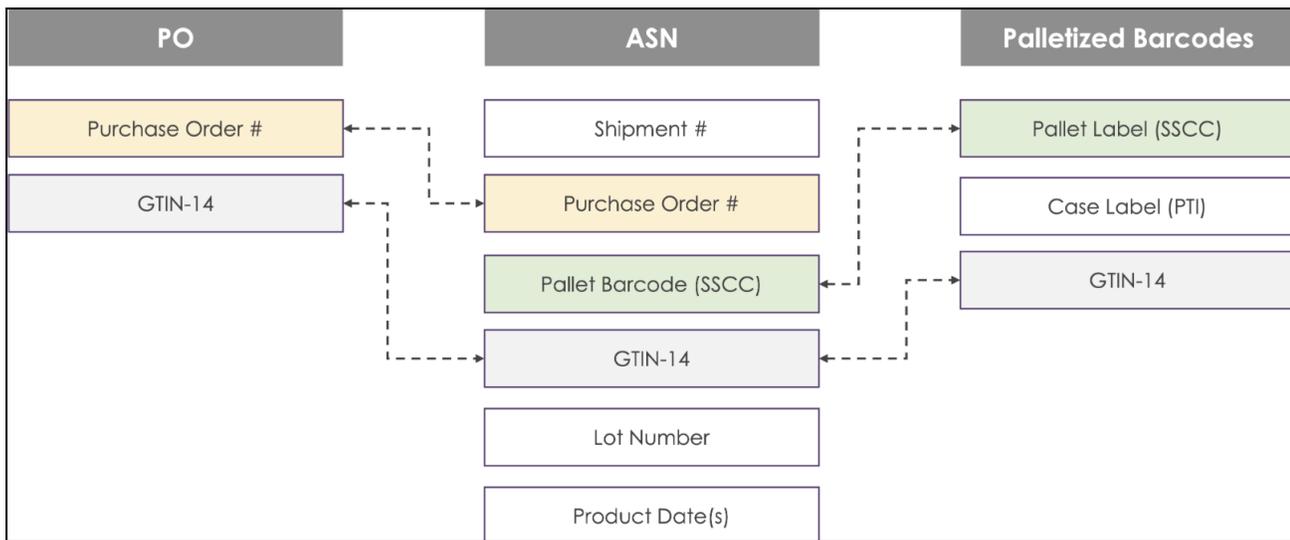


Figure 1 – Pallet license plate & corresponding ASN Tare segment

Pallet Label	Corresponding ASN Tare Segment																														
	<div style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> <p><b>MAN</b> <b>Marks and Numbers Information</b></p> <p style="font-size: small;">Pos: 1900    Max: &gt;1 Detail - Optional Loop: HL    Elements: 2</p> </div> <p style="font-size: x-small;">Loop Path: HL User Option (Usage): Must use Purpose: To indicate identifying marks and numbers for shipping containers</p> <p style="font-size: x-small;"><b>Element Summary:</b></p> <table border="1" style="width: 100%; border-collapse: collapse; font-size: x-small;"> <thead> <tr> <th>Ref</th> <th>Id</th> <th>Element Name</th> <th>Req</th> <th>Type</th> <th>Min/Max</th> <th>Usage</th> <th>Rep</th> </tr> </thead> <tbody> <tr> <td>MAN01</td> <td>88</td> <td>Marks and Numbers Qualifier</td> <td>M</td> <td>ID</td> <td>1/2</td> <td>Must use</td> <td>1</td> </tr> </tbody> </table> <p style="font-size: x-small;"><b>Description:</b> Code specifying the application or source of Marks and Numbers (87) Serial Shipping Container Code (SSCC-18) on the ASN must be linked to the SSCC-18 on the physical pallet received at the distribution center. SSCC is 20-digits, including 00 prefix. For example, MAN*GM*00103491002495026264-</p> <p style="font-size: x-small;"><b>Code List Summary (Total Codes: 21, Included: 1)</b></p> <table border="1" style="width: 100%; border-collapse: collapse; font-size: x-small;"> <thead> <tr> <th>Code</th> <th>Name</th> <th>Req</th> <th>Type</th> <th>Min/Max</th> <th>Usage</th> <th>Rep</th> </tr> </thead> <tbody> <tr> <td>GM</td> <td>EAN UCC Serial Shipping Container Code (SSCC) and Application Identifier</td> <td>M</td> <td>AN</td> <td>1/48</td> <td>Must use</td> <td>1</td> </tr> </tbody> </table> <p style="font-size: x-small;"><b>MAN02 87 Marks and Numbers</b>    M    AN    1/48    Must use    1 <b>Description:</b> Marks and numbers used to identify a shipment or parts of a shipment</p> <p style="font-size: x-small;">Sample data: MAN*GM*00393123450000000013~</p> <p style="font-size: x-small;">The Serial Shipping Container Code (SSCC) on the physical pallet must be linked to the MAN section using "GM" qualifier in your EDI 856 ASN transmission.</p>	Ref	Id	Element Name	Req	Type	Min/Max	Usage	Rep	MAN01	88	Marks and Numbers Qualifier	M	ID	1/2	Must use	1	Code	Name	Req	Type	Min/Max	Usage	Rep	GM	EAN UCC Serial Shipping Container Code (SSCC) and Application Identifier	M	AN	1/48	Must use	1
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<p>SSCC barcode acts as a license plate number to track a shipment of logistic units through the supply chain. SSCC on the pallet must correspond to the SSCC on the EDI 856 Advance Ship Notice (ASN).</p>																															



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<p style="text-align: center;"><b>GS1-128 Barcode</b></p> <p style="text-align: center;">(01)19506000117843(17)141120(10)NYFUL01(21)192837</p> <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;"> <p><b>GTIN-14</b></p> <p>(01)19506000117843</p> </div> <div style="text-align: center;"> <p><b>Expiry Date</b></p> <p>(17)141120</p> </div> <div style="text-align: center;"> <p><b>Batch Number</b></p> <p>(10)NYFUL01</p> </div> <div style="text-align: center;"> <p><b>Serial Number</b></p> <p>(21)192837</p> </div> </div> <p style="text-align: center;"><b>GS1 DataMatrix Barcode</b></p> <p>Case label must contain GS1-128 barcode or GS1 Data Matrix barcode, including GTIN-14, Expiration Date, and Lot/Batch Number.</p>	<div style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> <p><b>LIN Item Identification</b></p> <p style="text-align: right; font-size: small;">Pos: 0200    Max: 1 Detail - Optional Loop: HL    Elements: 9</p> </div> <p style="font-size: x-small;">Loop Path: HL User Option (Usage): Must use Purpose: To specify basic item identification data</p> <p><b>Element Summary:</b></p> <table border="1" style="width: 100%; border-collapse: collapse; font-size: x-small;"> <thead> <tr> <th>Ref</th> <th>Id</th> <th>Element Name</th> <th>Req</th> <th>Type</th> <th>Min/Max</th> <th>Usage</th> <th>Req</th> </tr> </thead> <tbody> <tr> <td>LIN01</td> <td>350</td> <td>Assigned Identification</td> <td>O</td> <td>AN</td> <td>1/20</td> <td>Used</td> <td>1</td> </tr> <tr> <td colspan="8"><b>Description:</b> Alphanumeric characters assigned for differentiation within a transaction set</td> </tr> <tr> <td>LIN02</td> <td>235</td> <td>Product/Service ID Qualifier</td> <td>M</td> <td>ID</td> <td>2/2</td> <td>Must use</td> <td>1</td> </tr> <tr> <td colspan="8"><b>Description:</b> Code identifying the type/source of the descriptive number used in Product/Service ID (234)</td> </tr> <tr> <td colspan="8"><b>Code List Summary</b> (Total Codes: 519, Included: 3)</td> </tr> <tr> <td></td> <td></td> <td><b>Code</b></td> <td></td> <td><b>Name</b></td> <td colspan="3"></td> <td></td> </tr> <tr> <td></td> <td></td> <td>PI</td> <td></td> <td>Purchaser's Item Code</td> <td colspan="3"></td> <td></td> </tr> <tr> <td></td> <td></td> <td>UK</td> <td></td> <td>GTIN 14-digit Data Structure</td> <td colspan="3"></td> <td></td> </tr> <tr> <td></td> <td></td> <td>UP</td> <td></td> <td>UCC - 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Figure 2 – Case label & corresponding ASN Pack segment

**Packing List**

A packing list must be included for every shipment. Packing slips are intended to be printed on plain 8 ½ x 11 letter paper in black and white with the page orientation set to landscape.



### Pack lists requirements:

- Prepare a packing list for each Kroger Purchase Order to include the Kroger Purchase Order number, Order Date, Vendor style/stock number, GTIN, NDC, Product Description, quantity ordered, quantity shipped, Ship To, Ship From, Shipping Method.
- Clearly indicate which carton contains the packing list.  
Note: If agreed upon, prepare individual store packing lists and a consolidated packing list when shipment is specified for multiple stores. Attach paperwork to the lead carton.
- Indicate the quantity and cost of pallets if Products are delivered on pallets for which Kroger will be charged.

### Pallet Labeling

Kroger utilizes GS1 US Serial Shipping Container Code (SSCC) to identify a logistic unit. A logistic unit can be any combination of units put together or transport and/or storage where the specific unit load needs to be managed throughout the supply chain. Some examples of logistics units are cases, pallets, or air cargo containers. SSCC barcode acts as a license plate number to track a shipment of logistic units through the supply chain.

### Data Element Requirements:

- GS1-128 or Data Matrix SSCC Barcode
- Supplier Name & Ship “From” Address, City, State, Zip, and DUNs + 4 Suffix
- Ship To Company & Ship “To” Address, City, State, Zip, and DUNs + 4 Suffix
- Carrier Name
- Bill of Lading #
- Purchase Order Number
- Single SKU Pallet OR Mixed Pallet designation

### Physical Requirements:

- One piece of wood or slip-sheet for every load of product is required.
- SSCC barcode on each pallet in the shipment must correspond to the pallet contents and destination reflected in the ASN. [GS1 US Specifications](#)
- The label must be placed on the inside of the shrink-wrap.
- The label must be temperature sensitive (to prevent smearing in freezing conditions).
- Each homogeneous pallet should have at least one barcode. It is recommended, however, that a pallet should contain multiple identical SSCC barcodes. This is especially helpful when the pallet is turned sideways in the truck or on the rack in the warehouse.
- Each layer of a mixed pallet or heterogeneous pallet is an independent logistic unit. Therefore, each layer of the heterogeneous pallet must be identified with its own SSCC label. The pallet tag should have “Mixed Pallet” designation.
- When pallets are stacked, they should be considered independent logistic units, each pallet should be identified with a unique SSCC. See Figure 3
- The SSCC should appear on the upper right half side of the pallet. Labels with barcodes should appear on the side of the pallet, 16-32 inches from the base of the pallet and at least 2 inches from vertical edge.

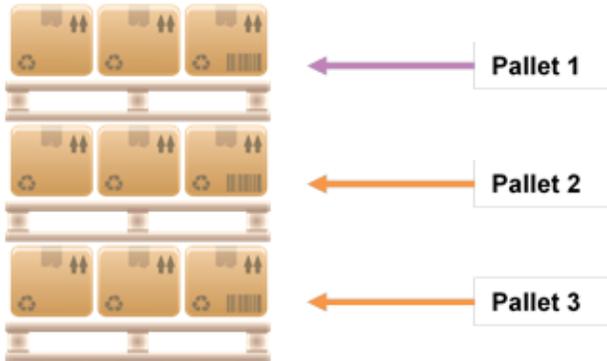


Figure 3- Stacked Pallets

### Case Labeling

Kroger utilizes the North American Industry Guidance for Standard Case Code Labeling, for more information please see attached document [GS1 US North American Guidance for Case Code Labeling](#)

### Data Element Requirements:

- Packer Information
- Global Trade Item Number or GTIN-14 (AI 01)
- Product Name & Description
- Lot Number (AI 10)
- Product Date (production date (AI 11), pack date (AI 13), expiration date (AI 17), best before date (AI 15), sell by date (AI 16))
- Quantity
- Unit of Measure

### Physical Requirements:

- Use 2D data matrix barcode or GS1 128 barcode symbology.
- Each case should at minimum have two identical barcode labels.
- The label must be temperature sensitive (to prevent smearing in freezing conditions).

### Contact Information:

Please send questions regarding Kroger Food Track & Trace product receiving specifications to [FoodTraceability@kroger.com](mailto:FoodTraceability@kroger.com)