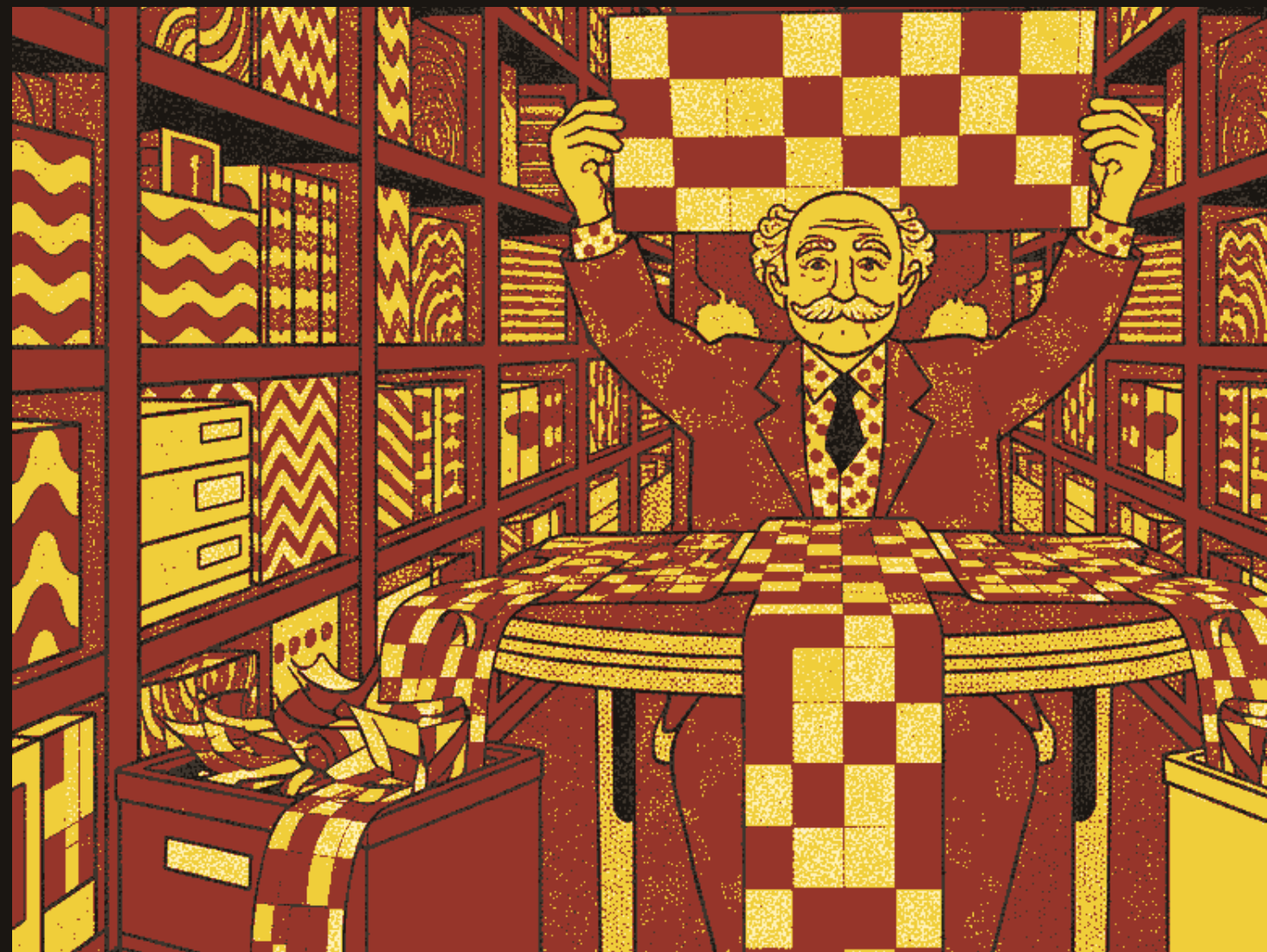


TRACEABILITY RECORDS

The rule gives you 24 hours. The records give you a week



WHAT YOU'LL LEARN

PP 2-3 What the rule actually asks

PP 4-5 Where the lots get lost

PP 6-7 What their template changes

P 8 How do I start?

BONUS Dock-side facts



PREPARED FOR
INDEPENDENT FOOD DISTRIBUTORS

TWENTY-FOUR HOURS

What the rule actually asks



LOTS & CLOCKS

Their tabs. Your lots.

DOCK-SIDE FACT: THE TEMPLATE The FDA's own template is free, published, and sortable — a tab per tracking event. The answer's shape was never the mystery. Getting your paper into it is.

The Food Traceability Rule is not aimed at somebody else. It covers anyone who manufactures, processes, packs or holds foods on the FDA's traceability list — and holding food is what a distributor does for a living. The obligation is specific: Key Data Elements, kept for every Critical Tracking Event, lot by lot, carried through from receiving to shipping.

The number that matters is not the compliance date. It is the clock inside the rule: when the FDA asks, the records go back within 24

hours. Not the good copies, not after the weekend — a day. The agency even publishes the exact electronic sortable spreadsheet it wants the answer in, a tab per event, a column per element.

The date that matters is July 20, 2028. The original compliance date came and went in January 2026; Congress directed enforcement to wait, and the FDA agreed. Which means every distributor in the country has the same countdown running, and most of them have not rehearsed the question.

THE NUMBERS

One lot's answer spans two tracking events at minimum — receiving and shipping — each carrying its own set of Key Data Elements: lot code, dates, quantities, locations, and the reference document tying it to paper.

WORTH KNOWING

The FDA held a public meeting in June 2026 specifically on lot-level tracking, because lot level is where the industry told the agency it was stuck. The pain is not hypothetical; the regulator named it.

THE TAKEAWAY

The question is never "do we keep records". It is "can one lot walk from receiving to shipping, on paper, in a day".

THE SIX-DAY DRILL

Where the lots get lost

Nobody in a distribution warehouse is missing records. Receiving slips are in a cabinet. Bills of lading are in another. Supplier invoices are in a third, and the warehouse system — bought years before anyone said the words lot-level — holds quantities and slots. Every piece exists. Every piece is real.

The problem is retrieval under a clock. Pulling one lot end to end means matching a lot code across four places that were never

designed to agree, and the person fastest at it is usually the owner, working from memory. A shop that rehearses the pull — one lot, start to finish — tends to discover the drill takes days, not hours.

And memory is the one system that cannot be inherited. The founder who can find any case in nine aisles without looking is real, and so is his retirement. The spreadsheet the FDA wants is, among other things, that memory written down.

THE NUMBERS

Four places one lot's paper can live: the receiving cabinet, the BOL file, the invoice file, and the system. A pull that touches all four, per lot, is why drills run to days.

WORTH KNOWING

A blank cell on the sheet is information. It says which supplier's paperwork keeps causing the gap — on a quiet Tuesday, instead of during a recall.

THE TAKEAWAY

The sheet is not paperwork. It is the shortest path between a lot code and every document that has ever touched it.

Same clock for everybody.

DOCK-SIDE FACT: THE INCUMBENT The biggest distributors have entire departments rehearsing this rule. An independent has a cabinet key and a good memory. The rule does not grade on a curve.



EVERY STEP IS NAMED

And the last one is a person

1

IT READS

Your receiving paper, invoices, bills of lading and the warehouse system's export — in whatever shape they are already in. It organises what exists; it does not ask you to re-enter it.

2

IT MATCHES

Every lot against the rule's own Key Data Elements, tracking event by tracking event, with the document behind each cell named.

3

IT FILLS THEIR SHEET

The FDA's published sortable-spreadsheet template — their tabs, their columns, your lots. Never a format we invented.

4

A PERSON SIGNS

The owner signs the sheet before it goes to anyone. It has no credentials to answer the FDA, contact a supplier, or send anything itself.

IF A LINE IS UNREADABLE

It prints MISSING. A smudged receiving line or a torn BOL is reported as unreadable — it is never counted as found.

IF A LOT CODE CONFLICTS

It flags the lot and shows both documents. It never picks the likelier one quietly.

IF THE PAPER IS GONE

The cell stays blank and says so. Blank means unverified — never 'probably fine' and never 'no'.

IF THE FDA ASKS TOMORROW

The sheet goes out exactly as signed, gaps showing. An honest MISSING beats an invented lot code in front of a regulator, every time.

“The rule gives me twenty-four hours. Our drill took six days.”

ON THE RECORD, OFF THE LOT: Sal Ferraro is a character from the Mr. Wilson field film — written from the food distribution dive and played by an actor. A composite of what the research found. Not a client, and not a customer testimonial.

What records do you keep?

— All of them. Receiving slips, bills of lading, invoices — forty years of paper. Ask me for any case in this building and I will walk you to it.

So what is the problem?

— The FDA does not want a case. It wants a lot — every document that touched it, receiving to shipping, in a spreadsheet, in twenty-four hours.

You ran a drill?

— One lot, start to finish, like the rule asks. Took us six days. Four of those we were looking for the key to the other filing cabinet.

What changes with the sheet?

— The looking. The paper was always there — now it is in their template with my signature on it, and the blanks tell me which supplier to call.

Sal Ferraro

SECOND-GENERATION DISTRIBUTOR
· NINE AISLES



AND FROM THE OTHER SIDE OF THE DESK

“It fills the government's sheet and then it stops. I sign it, or it goes nowhere. That part is not automated, and it is not going to be.”

MRS. WILSON · SHE RUNS THE SHOP · ALSO A CHARACTER

SO HOW DO I ACTUALLY START?

The audit is free and it reads your own paper. Here is what the 24-hour spreadsheet does once it is running:

- 1 Reads your records** Receiving paper, BOLs, invoices, the system's export. It organises what exists; nothing is re-typed.
- 2 Fills their template** The FDA's own tabs and columns, lot by lot, with the document behind every cell named.
- 3 Prints its blanks** A gap shows as MISSING — never 'probably fine'. The blanks name which supplier's paper causes them.
- 4 Leaves you the position** You know what you can legally ship before a distributor asks. The sheet shows the state of play; sending anything to anyone stays the owner's call.

One fix at a time. You keep the keys.

MRWILSON.TECH



The 24-Hour Spreadsheet · prepared for Independent food distributors · research dated 2006-08-18 · trade-level guide; no named client, no private data, and no figure this shop has not measured. Quotes are from the Mr. Wilson field film.