

Retailer Recordkeeping Assessment

Regulatory Requirements

Retailers are required to maintain records used in the normal course of business that verify a country of origin claim. Records are used to identify the covered commodity, the retailer's immediate previous supplier and the country of origin (and method of production in the case of fish and shellfish). Records are required to be maintained for a period of one year from the date the origin declaration is made at retail. 7 CFR §65.500

Interview Questions to Assess Retailer Compliance with Recordkeeping Requirements

1. What types of records used in the normal course of business are received from suppliers that you rely on to create your own labels, such as signs, placards, and scale printers)?
2. Where are records maintained?
3. How long are records maintained in store, or at corporate headquarters or both?
4. As the responsible store authority, please briefly explain your knowledge of COOL requirements and your systems to ensure compliance.
5. Would you be interested in receiving additional outreach materials and guidance from USDA's COOL program to assist your staff and consumers?

***No Non-Compliance Findings will be identified or issued based on retailer responses to these questions.**

Code	Non-Compliance Findings for “New” Retail Reviews
1	The covered commodity is not identified with the country of origin.
2	The country of origin declaration is not legible and/or is not placed in a conspicuous location.
3	The country of origin declaration is not accurate at the point of sale.
4a	The country of origin is not stated in an acceptable form. The use of "or" and "and/or" and “may contain” is not acceptable.
4b	The country of origin is not stated in an acceptable form. The regional designation or the term, “locally grown” does not provide sufficient origin declaration.
4c	The country of origin is not stated in an acceptable form. Production steps for meat muscle cuts are not present or not stated in an acceptable form.
5	Abbreviations and variant spellings do not unmistakably indicate the country of origin.
6	The covered commodity is not identified with the method of production.
7	The method of production declaration is not legible or is not placed in a conspicuous location.
8	The method of production declaration is not accurate at the point of sale.
9	The method of production is not stated in an acceptable form.