



Country of Origin Labeling



Initial and Follow-up Workbook



Introduction

- Retail reviews are conducted in locations identified by COOL Division.
- Trained Reviewers conduct reviews to verify the retail store location is compliant with COOL regulatory requirements.
- The Retail Review Workbook is used to record findings and report them to the COOL Division.



Retail Review Workbook

- There are 2 types of Retail Surveillance Reviews. The review type will require one of the following workbooks:
 1. Initial Retail Surveillance Review Workbook
 - ü 6 commodity categories
 - ü 5 interview questions
 2. Follow-up Retail Surveillance Review Workbook
 - ü 6 commodity categories
 - ü 6 recordkeeping sections



Retail Review Workbook

What do the Initial and Follow-up Retail Review Workbook have in common?

Both workbooks include an Information Form

	Agricultural Marketing Service	Country of Origin Labeling Division	1400 Independence Avenue, SW. Room 2620-S, STOP 0216 Washington, DC 20250-0216	Information Form March 22, 2016
Mandatory Country of Origin Labeling (COOL) - Final Rule				
Date of Review		Store Name		
Reviewer's Name		Store Address		
File Name		City, State Zip		
COOL Website	www.ams.usda.gov/cool	COOL E-mail Address	COOL.Audit@ams.usda.gov	
COOL Retail Surveillance Information Form				
Summary				
<p>The 2002 and 2008 Farm Bill amended the Agricultural Marketing Act of 1946 (Act) to require designated retailers to notify their customers of the country(ies) of origin and method(s) of production (wild or farm raised as applicable) of covered commodities. Covered commodities include muscle cuts of lamb, chicken, and goat; ground lamb, ground chicken, and ground goat; wild and farm-raised fish and shellfish; perishable agricultural commodities; macadamia nuts; pecans; ginseng; and peanuts. Covered commodities are exempt from COOL requirements if they are an ingredient in a processed food item. Retailers determined to be in violation of the Act must be notified of the violation and provided with a 30-day period during which they may take the necessary steps to comply. If upon completion of the 30-day period it is determined that the retailer has willfully violated the Act, the retailer may be fined up to \$1,000 for each violation.</p>				
Identification Requirements				
<p>To convey the country of origin and method of production information, retailers may use a placard, sign, label, sticker, band, twist tie, pin tag, stamp, mark, or other clear and visible sign on the covered commodity or on the package, display, holding unit, or bin containing the commodity at final point of sale to consumers. The declaration of the country(ies) of origin and method(s) of production may be typed, printed, or handwritten provided it is in conformance with other Federal labeling laws and does not obscure other required labeling information. The declaration for country of origin and method of production must be legible and be placed in a conspicuous location, so as to render it likely to be read and understood by a customer under normal conditions of purchase.</p>				
Record Keeping Requirements				
<p>Upon request by USDA representatives, suppliers, and retailers subject to this Act shall make records available that verify the COOL claims and provide supplier information. Such records may be maintained in any location and shall be provided within 5 business days of the request. For pre-labeled products, the label itself is sufficient evidence on which the retailer may rely to establish the products' country of origin, method of production; however, the retailer must provide a record that identifies the immediate previous supplier information. The supplier information must include at a minimum the supplier name, city and state. For items that are not pre-labeled or if the information from the pre-labeled container is not available, records maintained in the normal course of business must be available which specify the product, country of origin, method of production, and retailer's immediate previous supplier. Records must be maintained for a period of 1 year from the date the declaration is made at retail.</p>				
Types of Findings				
<ul style="list-style-type: none">• Failure to convey country of origin and method of production information to consumers.• Failure to provide accurate country of origin and method of production information to consumers.• Failure to convey animal production steps for meat muscle cuts to consumers, (i.e., born, raised, harvested).• Failure to maintain records that substantiate the COOL claims and provide supplier information.				
Questions? Contact the COOL Division at (202) 720-4486				
USDA is an equal opportunity employer and provider.				



Initial Review Workbook

Page 1:

- General Retailer and Reviewer information
- Non-Compliance Code Legend

Country of Origin Labeling (COOL) Retail Surveillance Review Checklist	
Review Number	Reviewer's Name
Date Reviewed	Reviewer's Email
Store Name	Reviewer's Phone Number
Store ID Number	Store Representative
Physical Address	Responsible Authority's Name
City, State ZIP	Responsible Authority's Position
Store Phone Number	Responsible Authority's Email
Corporate Contact Email	Findings Identified?
<p>This review is conducted in accordance with the requirements contained in the Mandatory Country of Origin Labeling Final Rule (CFR Part 603 and 605, as amended) through March 2, 2016. The results of this review are non-official until reviewed by the COOL Division Director.</p>	
Non-Compliance (NC) Codes	
Code	Non-Compliance Findings
1	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 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	Covered commodity is not identified with the method of production.
7	The method of production declaration is not legible and/or is not placed in a conspicuous location.
8	The method of production declaration is not accurate at point of sale.
9	The method of production is not stated in an acceptable form. (i.e., wild, wild caught, farmed, farm-raised, etc.)
<p>Questions? Contact the COOL Division at (202) 726-4486</p>	



Initial Review Workbook

Page 2:

- Labeling Non-Compliance section for Fruits, Nuts & Ginseng, Vegetables, and Fish & Shellfish

Number of Items Reviewed		Fruits			Not sold in store
Non-Complying lb(m)s		NC Codes		Notes	
1					
2					
3					
4					
5					
6					
7					

Number of Items Reviewed		Nuts & Ginseng			Not sold in store
Non-Complying lb(m)s		NC Codes		Notes	
1					
2					
3					
4					
5					
6					
7					

Number of Items Reviewed		Vegetables			Not sold in store
Non-Complying lb(m)s		NC Codes		Notes	
1					
2					
3					
4					
5					
6					
7					

Number of Items Reviewed		Fish & Shellfish			Not sold in store
Non-Complying lb(m)s		NC Codes		Notes	
1					
2					
3					
4					
5					
6					
7					



Initial Review Workbook

Page 3:

- Labeling Non-Compliance section for Chicken and Lamb & Goat
- 5 Interview questions to assess retailer Compliance with recordkeeping requirements

Number of Items Reviewed		Chicken		Not sold in store
Non-Complying Item(s)		NC Codes		Notes
1				
2				
3				
4				
5				
6				
7				

Number of Items Reviewed		Lamb & Goat		Not sold in store
Non-Complying Item(s)		NC Codes		Notes
1				
2				
3				
4				
5				
6				
7				

Interview Questions to Assess Retailer Compliance with Recordkeeping Requirements	
Q1: 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?	
Q2: 2. Where are records maintained?	
Q3: 3. How long are records maintained?	
Q4: 4. As the responsible store authority, please briefly explain your knowledge of COOL requirements and your systems to ensure compliance.	
Q5: 5. Would you be interested in receiving additional outreach materials and guidance from USDA's COOL program to assist your staff and consumers?	



Initial Review Workbook

Page 4:

- Additional Items section

	Additional Items			Notes
	Non-Complying Item(s)	NC Codes		
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				



Follow-up Review Workbook

Page 1:

- General Retailer and Reviewer information
- Non-Compliance Code Legend

USDA Agricultural Marketing Service		Country of Origin Labeling Division		1400 Independence Avenue, SW, Room 2620-S, STOP 0216 Washington, DC 20250-0216		Checklist March 22, 2016	
Country of Origin Labeling (COOL) Retail Surveillance Follow up Review Checklist							
Review Number		Reviewer's Name					
Date Reviewed		Reviewer's Email					
Store Name		Reviewer's Phone Number					
Store ID Number		Store Representative					
Physical Address		Responsible Authority's Name					
City, State ZIP		Responsible Authority's Position					
Store Phone Number		Responsible Authority's Email					
Corporate Contact Email		Findings Identified?					
<p>This review is conducted in accordance with the requirements contained in the Mandatory Country of Origin Labeling Final Rule, CFR Part 60 and 65, as amended through March 2, 2015. Tab 7</p> <p>The results of this review are not official until reviewed by the COOL Division Director.</p>							
Non-Compliance (NC) Codes							
Code	Non-Compliance Findings	Code	Non-Compliance Findings				
1	Covered commodity is not identified with the country of origin.	8	The method of production declaration is not accurate at point of sale.				
2	The country of origin declaration is not legible and/or is not placed in a conspicuous location.	9	The method of production is not stated in an acceptable form. (i.e., wild, wild caught, farmed, farm-raised, etc.)				
3	The country of origin declaration is not accurate at point of sale.	10	Records were not provided within 5 business days.				
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.	11	Records do not provide the country of origin information.				
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.	12	Records do not provide the method of production information.				
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.	13	Records do not provide the Supplier information. (Supplier records are required for all transactions.)				
5	Abbreviations and variant spellings do not unmistakably indicate the country of origin.	14	Records information for country of origin as provided by supplier is not accurately conveyed to point of sale label.				
6	Covered commodity is not identified with the method of production.	15	Records information for method of production as provided by supplier is not accurately conveyed to point of sale label.				
7	The method of production declaration is not legible and/or is not placed in a conspicuous location.	16	Records that identify the chain of custody for the pre-labeled item were not provided within 5 business days.				
Questions? Contact the COOL Division at (202) 720-4486							



Follow-up Review Workbook

Page 2:

- Labeling Non-Compliance section for Fruits and Nuts & Ginseng
- Recordkeeping section for Fruits and Nuts & Ginseng

Number of Items Reviewed		Fruits			Not sold in store
Non-Complying Item(s)		NC Codes		Notes	
1					
2					
3					
4					
5					
6					
7					
Recordkeeping					
Item Description (Store Label):					Actual Group Reviewed:
Country of Origin (Store Label):					
Item Description (Store Record):					Were records provided?
Country of Origin (Store Record):					
Record Reviewed		Record Transaction ID / Record Details			
Pre-labeled Package Supplier Information:					
Retailer's Immediate Previous Supplier Information (Store Record):					
Number of Items Reviewed		Nuts & Ginseng			Not sold in store
Non-Complying Item(s)		NC Codes		Notes	
1					
2					
3					
4					
5					
6					
7					
Recordkeeping					
Item Description (Store Label):					Actual Group Reviewed:
Country of Origin (Store Label):					
Item Description (Store Record):					Were records provided?
Country of Origin (Store Record):					
Record Reviewed		Record Transaction ID / Record Details			
Supplier Information (Pre-labeled Package):					
Retailer's Immediate Previous Supplier Information (Store Record):					



Follow-up Review Workbook

Page 3:

- Labeling Non-Compliance section for Vegetables and Fish & Shellfish
- Recordkeeping section for Vegetables and Fish & Shellfish

Number of Items Reviewed		Vegetables			Not sold in store
Non-Complying Item(s)		NC Codes		Notes	
1					
2					
3					
4					
5					
6					
7					
Recordkeeping					
Item Description (Store Label):					Actual Group Reviewed:
Country of Origin (Store Label):					
Item Description (Store Record):					Were records provided?
Country of Origin (Store Record):					
Record Reviewed		Record Transaction ID / Record Details			
Supplier Information (Pre-labeled Package):					
Retailer's Immediate Previous Supplier Information (Store Record):					
Number of Items Reviewed		Fish & Shellfish			Not sold in store
Non-Complying Item(s)		NC Codes		Notes	
1					
2					
3					
4					
5					
6					
7					
Recordkeeping					
Item Description (Store Label):					Actual Group Reviewed:
Country of Origin (Store Label):					
Method of Production (Store Label):					
Item Description (Store Record):					Were records provided?
Country of Origin (Store Record):					
Method of Production (Store Record):					
Record Reviewed		Record Transaction ID / Record Details			
Supplier Information (Pre-labeled Package):					
Retailer's Immediate Previous Supplier Information (Store Record):					



Follow-up Review Workbook

Page 4:

- Labeling Non-Compliance section for Chicken and Lamb & Goat
- Recordkeeping section for Chicken and Lamb & Goat

Number of Items Reviewed		Chicken			Not sold in store
Non-Complying Item(s)		NC Codes		Notes	
1					
2					
3					
4					
5					
6					
7					
Recordkeeping					
Item Description (Store Label):					Actual Group Reviewed:
Country of Origin (Store Label):					
Item Description (Store Record):					Were records provided?
Country of Origin (Store Record):					
Record Reviewed		Record Transaction ID / Record Details			
Supplier Information (Pre-labeled Package):					
Retailer's Immediate Previous Supplier Information (Store Record):					
Number of Items Reviewed		Lamb & Goat			Not sold in store
Non-Complying Item(s)		NC Codes		Notes	
1					
2					
3					
4					
5					
6					
7					
Recordkeeping					
Item Description (Store Label):					Actual Group Reviewed:
Country of Origin (Store Label):					
Item Description (Store Record):					Were records provided?
Country of Origin (Store Record):					
Record Reviewed		Record Transaction ID / Record Details			
Supplier Information (Pre-labeled Package):					
Retailer's Immediate Previous Supplier Information (Store Record):					



Follow-up Review Workbook

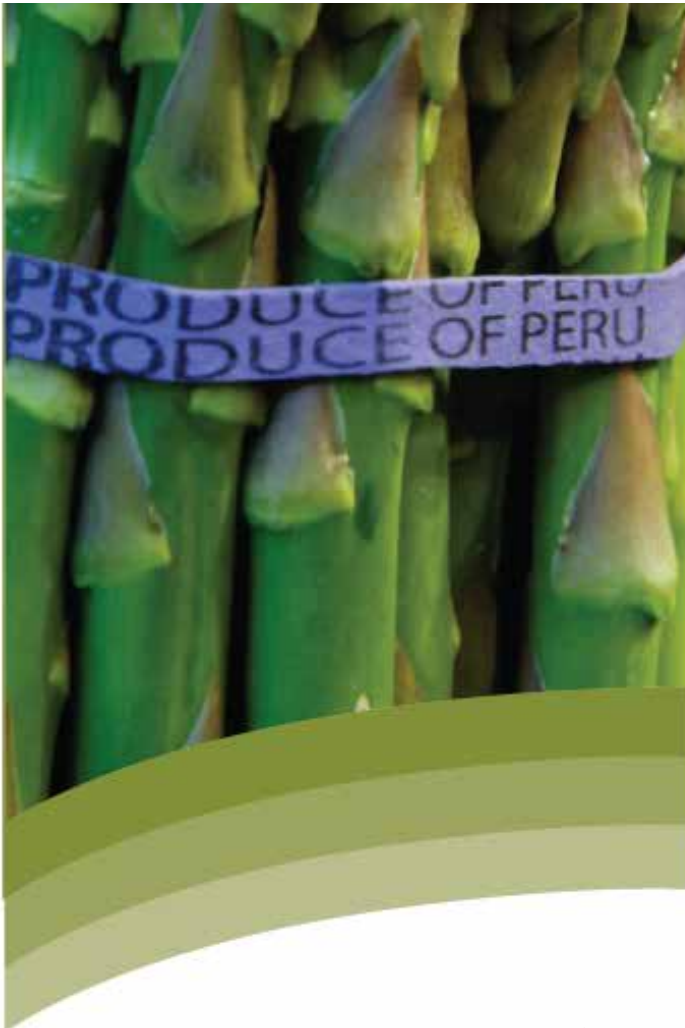
Page 5:

- Additional Items section

	Additional Items			Notes
	Non-Complying Item(s)	NC Codes		
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				



Non-Compliance (NC) Codes





Introduction

- Non-Compliance (NC) Codes help identify and record the type of findings observed at the retail store location.
- There are 16 NC codes; however, depending on the type of retail review (initial or follow-up) being conducted, only part of the codes may apply.



Initial Retail Review NC Codes

**NC codes 1 – 9 apply when
conducting an **Initial** Retail
Review**



Follow-up Retail NC Codes

**NC codes 1 – 16 apply when
conducting a **Follow-up** Retail
Review**



Labeling NC Codes 1-9

Code	Non-Compliance Findings for Initial 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	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.



Recordkeeping NC Codes 10-16

Code	Non-Compliance Findings for Initial Retail Reviews
10	Records were not provided within 5 business days.
11	Records do not provide the country of origin information.
12	Records do not provide the method of production information.
13	Records do not provide the Supplier information. (Supplier records are required for all Traceback Items)
14	Records information for country of origin as provided by supplier is not accurately conveyed to point of sale label.
15	Records information for method of production as provided by supplier is not accurately conveyed to point of sale label.
16	Records that identify the chain of custody for the pre-labeled item were not provided within 5 business days.



Let's Review All NC Codes





NC Code 1 – No Country of Origin

The retailer did not convey country of origin information to consumers in any manner.

<u>Code</u>	<u>Non-Compliance Findings</u>
1	Covered commodity is not identified with the country of origin.



NC Code 1 – No Country of Origin

- Some retailers use a box to display covered commodities and country of origin. This is acceptable as long as the consumer can easily read and understand the information.
- No country of origin means no origin is visible on the individual package, PLU stickers, store sign, store label, rubber band, etc.



NC Code 1 – No Country of Origin

Example:





NC Code 1 – No Country of Origin

Example:





NC Code 1 – No Country of Origin

Example:





NC Code 1 – Grade Standards

- Grade standards do not indicate COOL.
- Grade designations only indicate the product meets the criteria established by the standard.





NC Code 1 – Inspection/Organic

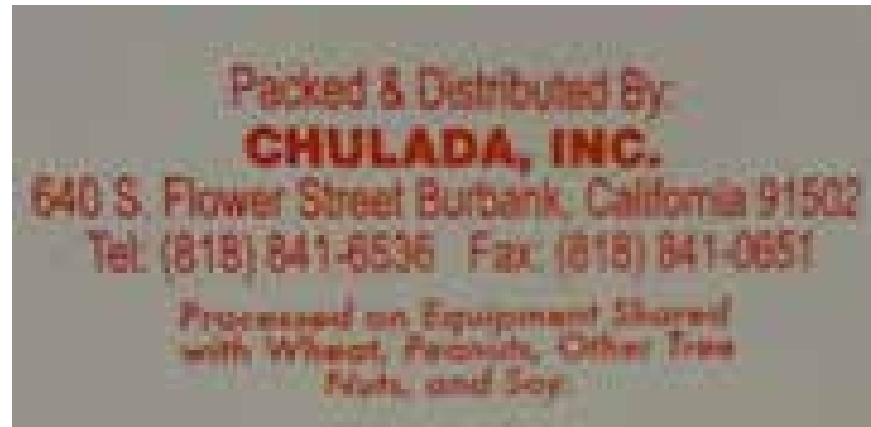
- “US Gov’t Inspected” and the USDA Organic Seal do not indicate COOL.
- Domestic and imported items are inspected by US Government for wholesomeness and may earn USDA Organic seal.





NC Code 1 – Supplier’s Address

- A supplier’s address does not indicate COOL.
- The packer’s or distributor’s address refers to the company, not the product’s origin.





NC Code 2 – Not Legible and/or Conspicuous

Country of origin is present however it is covered, smeared, obstructed, etc.

<u>Code</u>	<u>Non-Compliance Findings</u>
2	The country of origin declaration is not legible and/or is not placed in a conspicuous location.



NC Code 2 - Inconspicuous

Example: Below the retail store advertisement sign is covering country of origin claim.





NC Code 2 - Inconspicuous

Example: The Organic tape is covering the PLU sticker that contains the country of origin information.





NC Code 2 – Less than 50%

- In the case where less than 50% of the items in a bulk bin have a country of origin, NC code 2 will apply.





NC Code 2 – Less than 50%

Example: Below, 1 of the 6 Green Onion bunches has a tag stating “Produce of Mexico.” The other bunches do not have COOL. Therefore, NC2 is recorded for Green Onions. Do not count each individual item; estimates are sufficient.





NC Code 2 – Additional Examples

- Smearred printing making the country of origin illegible.
- The origin sign is located far away from the item it is referencing or too small to see.



NC Code 2 – Smeared

Example: COOL information has rubbed off the sign.





NC Code 2 – Additional Examples

- NC code 2 applies when checkboxes list the possible country(ies) of origin; however, none of the checkboxes are selected.

A photograph of a green form titled "COUNTRY OF ORIGIN". The form lists five options, each with an empty checkbox to its left: "U.S.A. ()", "CHILE ()", "MEXICO. ()", "ECUADOR()", and "OTHER _____". A blue line points from a box labeled "NC 2" to the right side of the form.

NC 2



NC Code 3 – Not Accurate

NC 3 is appropriate when contradictory origin labels are visible to the consumer.

<u>Code</u>	<u>Non-Compliance Findings</u>
3	The country of origin declaration is not accurate at point of sale.



NC Code 3 – Inaccurate

- Examples of NC code 3 include:
 - Product Tag vs. Store Label – tag states USA but store label states Mexico
 - Product Label vs. Store Banner – label states Peru however store banner states Canada
 - Package Label vs. Store Label – pre-labeled package states Product of Australia however store label states born, raised, harvested USA



NC Code 3 – Inaccurate

Example: The kale has a product tag stating “Product of USA.” The store sign on the shelf states “Product of Mexico.” The product tag and shelf sign contradict; therefore, this is NC code 3.





NC Code 3 – Inaccurate

Example:



NC 3



USA	Leeks
Mexico	Lemons
USA	Lettuce



NC Code 3 – Inaccurate

Example:



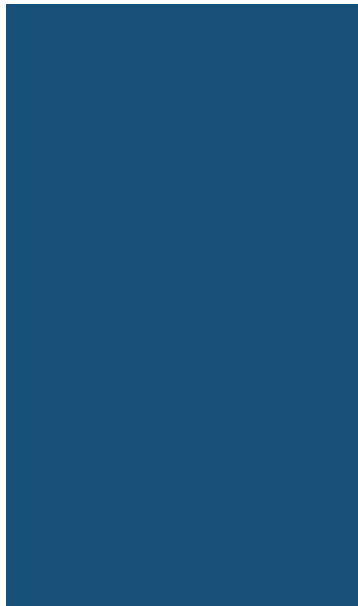
NC 3





NC Code 1, 2, & 3

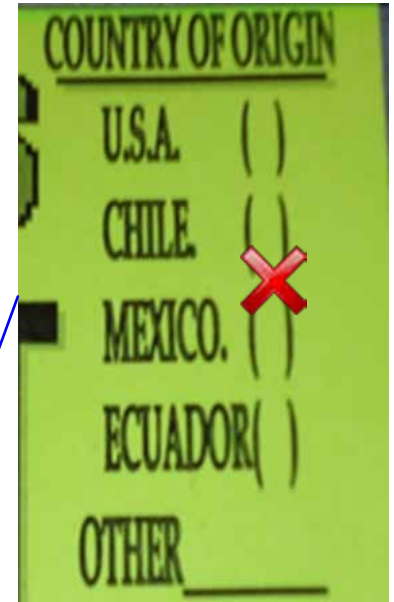
NC Code 1: COOL is not listed.



NC Code 2: Checkbox with absent marking.



NC Code 3: Checkbox with unclear marking.



NC 3



NC Code 4a, 4b, 4c – Unacceptable Form

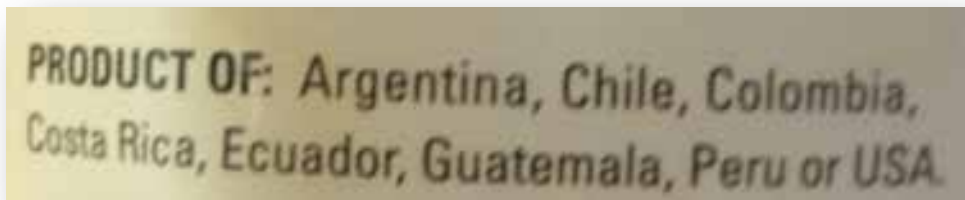
- Appropriate when the country of origin is not stated in an acceptable form.

<u>Code</u>	<u>Non-Compliance Findings</u>
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.



NC Code 4a

- Disjunctive (“or,” “and/or”) and ambiguous (“may contain”) COOL statements are not acceptable.





NC Code 4a – Use of “OR”

Example: Store sign states “Grown in US or Mexico”. The use of “OR” is not acceptable.





NC Code 4b

- Indistinct localities, continent names, compass points, or regions comprised of more than one country are not acceptable in lieu of the country of origin.

GULF SHRIMP





NC Code 4b – Indistinct Locality

Example: The store sign states “Southern Grown”. This location cannot be clearly identified.





NC Code 4c – Production Steps

- Ø Meat muscle lacking accurate production step information (born, raised, harvested) are cited with NC code 4c.
- Ø Only applies to Chicken, Lamb, and Goat





NC Code 4c – Production Steps

- Ø Some muscle cut meat labels may contain multiple errors (non-distinct region; “or” disjunction; missing production steps).
- Ø In these situations, default to NC code 1 – No country of origin.





Imported Meat

Ø Meat that is imported and for which no production steps have occurred in the United States, shall retain the origin as declared by U.S. Customs and Border Protection.





NC Code 5 – Spelling and Abbreviations

Improper spelling or abbreviations of the country of origin are not acceptable.

<u>Code</u>	<u>Non-Compliance Findings</u>
5	Abbreviations and variant spellings do not unmistakably indicate the country of origin.



NC Code 5

Example: The images below are examples of unacceptable COOL, and warrant NC code 5:

- Belt Fish sign states “VIET/Wild”
- Lime with sign states “MEX”





NC Codes 6-9

- NC Code 6, 7, 8, and 9 apply to Fish and Shellfish covered commodities.
- Only Fish and Shellfish covered commodities are required to be labeled with the Method of Production (MOP)



NC Code 6 – Missing MOP

- The retailer did not convey method of production to consumers in any manner.
- Applies to Fish and Shellfish only.

<u>Code</u>	<u>Non-Compliance Findings</u>
6	Covered commodity is not identified with the method of production.



Acceptable Method of Production

Reminder:

- Acceptable MOP include:
 - Wild
 - Wild-Caught
 - Farmed
 - Farm-Raised



NC Code 6 – Missing MOP

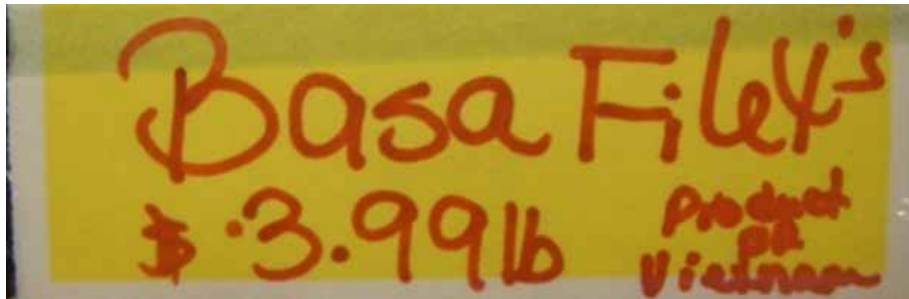
- An NC code 6 may be assigned irrespective of the presence or absence of country of origin.
- The MOP is not required to be near the origin declaration; they may be on opposite sides of the item (common for pre-labeled frozen items).



NC Code 6 – Missing MOP

Example:

- Basa Filets are missing MOP
- Lake Perch Fillet is missing MOP





NC Code 7 – MOP Illegible and/or Inconspicuous

- MOP is present; however, it is covered, smeared, obstructed, or not indicated on checkbox.
- Applies to Fish and Shellfish only.

<u>Code</u>	<u>Non-Compliance Findings</u>
7	The method of production declaration is not legible and/or is not placed in a conspicuous location.



NC Code 7 – MOP Illegible and/or Inconspicuous

Example: Both examples show there are checkboxes to indicate the MOP; however, the MOP is not selected.





NC Code 8 – Inaccurate MOP

- Both Farm-Raised and Wild-Caught are declared to the consumer.
- Applies to Fish and Shellfish only.

<u>Code</u>	<u>Non-Compliance Findings</u>
8	The method of production declaration is not accurate at point of sale.



NC Code 8 – Inaccurate MOP

Example: Store sign below declares both Farm-Raised and Wild as the MOP.





NC Code 8 – Inaccurate MOP

Example: Store bar code label states “Wild Caught”. Additional sticker states “Farm-Raised”.





NC Code 9 – MOP Not in Acceptable Form

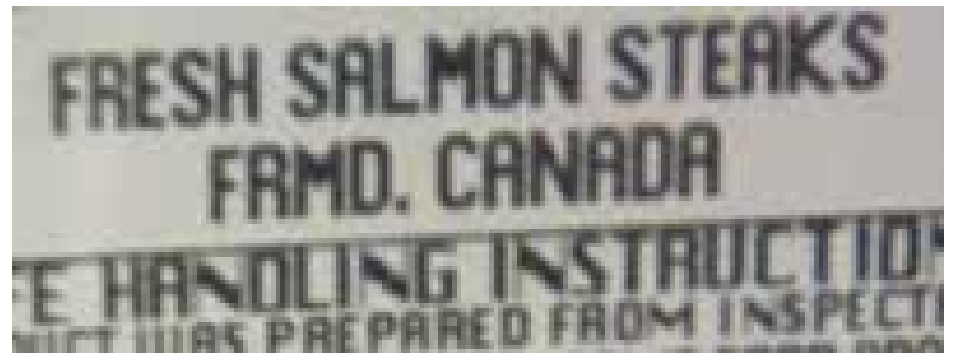
- MOP is not stated in one of these acceptable forms:
 - Wild, Wild-Caught
 - Farmed, Farm-Raised
- Applies to Fish and Shellfish only.

<u>Code</u>	<u>Non-Compliance Findings</u>
9	The method of production is not stated in an acceptable form. (i.e., wild, wild caught, farmed, farm-raised, etc.)



NC Code 9 – MOP Not Acceptable

Example: Store signs below are examples of unacceptable MOP.





Multiple NC Codes

- There are instances when multiple NC codes on a single commodity are warranted.
- Multiple codes are NOT to be used for indecision, but rather specific situations when more than 1 Non-compliance is observed.
- Most common: NC1 and NC6 on Fish & Shellfish items.



Multiple NC Codes

Example: NC code 1 and NC code 6 apply





Multiple NC Codes

Example: NC code 3 and NC code 5 apply





Multiple NC Codes

Example: NC code 2 and NC code 7 apply





NC Code 10 – No Records within 5 business days

- Records were not provided within 5 business days from the day of the review.
- Day 1 is the day after the review is conducted.
- Only applies to non-Pre-labeled items.

Code	Non-Compliance Findings
10	Records were not provided within 5 business days.



NC Code 11 – No Country of Origin on Records

- The records provided did not include country of origin.
- The country of origin can be abbreviated on **records only** provided the retailer can accurately decipher it.

<u>Code</u>	<u>Non-Compliance Findings</u>
11	Records do not provide the country of origin information.



NC Code 12 – No MOP on Records

- The records provided did not include method of production.
- MOP can be abbreviated on records only provided the retailer can accurately decipher it.

<u>Code</u>	<u>Non-Compliance Findings</u>
12	Records do not provide the method of production information.



NC Code 13 – No Supplier Information on Records

- Multiple records can be provided to show the supplier's information.
- The required supplier information includes name and address (city/state).

<u>Code</u>	<u>Non-Compliance Findings</u>
13	Records do not provide the Supplier information. (Supplier records are required for all Traceback Items)



NC Code 14 – Record’s Country of Origin

- Retailer states different country of origin than the one provided by the supplier.
- **Example:** Master container states Brazil as the country of origin; however, store sign states product of Peru.

<u>Code</u>	<u>Non-Compliance Findings</u>
14	Records information for country of origin as provided by supplier is not accurately conveyed to point of sale label.



NC Code 15 – Record's MOP

- Retailer states different MOP than the one provided by the supplier.
- **Example:** Invoice states Farm-Raised as the method of production; however, store sign states Wild-caught.

<u>Code</u>	<u>Non-Compliance Findings</u>
15	Records information for method of production as provided by supplier is not accurately conveyed to point of sale label.



NC Code 16 – Records for Pre-labeled item

- Records identifying the immediate previous source for a pre-labeled item were not provided within 5 business days.

<u>Code</u>	<u>Non-Compliance Findings</u>
16	Records that identify the chain of custody for the pre-labeled item were not provided within 5 business days.



Is this a Pre-labeled Item?





Is this a Pre-labeled Item?





Questions?

