



#### **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**

<u>USDA</u>	Agricultural Marketing Service	Country of Origin Labeling Division	1400 Independence Room 2620-S, STO Washington, DC 20	P 0216	Information Form March 22, 2016
Mano	atory C	ountry of Ori	gin Labeling	(COOL) - Fina	al Rule
Date of Review			StoreName		
Reviewer's Name			Store Address		
File Name			City, State Zip		
COOL Website	www.ams.u	sda.gov/cool	COOL E-mail Address	COOLAudit@ams.	<u>usda.qov</u>
		COOL Retail Sur	veillance Informat	ion Form	
			Summary		

The 2002 and 2008 Farm Bill amended the Agricultural Mark eting 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 rais ed 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; peris hable agricultural commodities; macadamia nuts; pecans; ginseng; and peanuts. Covered commodities are exempt from COOL requirements if they are an ingredient in a processe of 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 necess ary steps to compt). 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.

#### Identification Requirements

To convey the country of origin and method of production information, retailers may use a placard, sign, label, stick er, band, twist tie, pin tag, stamp, mark, or other clear and visible sign on the covered commodity or on the pack age, display, holding unit, or bin containing the commodity at final point of sale to consumers. The declaration of the country(les) 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.

#### Record Keeping Requirements

Upon request by USDA representatives, suppliers, and retailers subject to this Acts hall 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 bus iners days of the request F or pre-labeled products, the label itself is sufficient evidence on which the retailer may rely to establish the product's 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 bus iness 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.

#### Types of Findings

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.



Page 1:

 General Retailer and Reviewer information

Non-Compliance Code
 Legend

USDA	Agricultural Marketing Service	Origin Labeling Division	1400 independence A Room 2620-\$, \$ TOP 0 Viashington, DC 2025	216 Checklist 0-0216 March 22, 2016				
		ntry of Ongin Labeling (	(COOL) Retail Surveillance	e Review Checklist				
Review Nu	mber		Reviewer's Name					
Date Revie	wed		Reviewer's Email					
Biore Nam	ame Reviewer's Phone Number							
Store ID N	Num ber Bio re Representative							
Physical A	ddress							
City, State	ZIP		Responsible Authority's Position					
ziore Phor	e Number		Responsible Authority's Email					
Corporate Brnall	Contact		Findings identified?					
This revie	w is conducte	CFR Part 60 and The results of this review are no	nts contained in the Mandatory Country 165, as am ended through March 2, 20 scofficial until reviewed by the COOL compliance (NC) Codes	16.				
Code		in on-o	Non-Compliance Findings					
1	Covered a	ommodity is not identified with	the country of origin.					
2	The countr	y o forigin declaration is not le	gible and/or is not placed in a co	nspicuous location.				
3	The countr	y o forigin declaration is not a	ccurate at point of sale.					
4a	The countr acceptable		acceptable form. The use of "or"	and "and/or" and "may contain" is not				
4b	The countr does not p	y oforigin is not stated in an a rovide sufficient origin de dara	acceptable form. The regional de fon.	esignation or the term, "locally grown"				
4c		yoforigin is not stated in an a not stated in an acceptable for	acceptable form. Production step rm.	os for meat muscle outs are not				
5	Abbreviatio	ons and variant spellings do no	ot unmistakably indicate the cour	n try of origin.				
6	Covered o	ommodity is not identified with	the method of production.					
7	The metho	d of production declaration is	not legible and/or is not placed ir	a conspicuous location.				
	The method of production declaration is not accurate at point of sale.							
8	The method of production is not stated in an acceptable form. (i.e., wild, wild caught, farmed, farm-raised, etc.)							
8	The metho		n an acceptable form. (i.e., wild, act the COOL Division at (202) 720⊰	-				



Page 2:

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

Number of Item's Reviewed			Fruits		Not sold in store
Non-Complying liem(s)	N	Code	6	Notes	
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7		++			
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8		++			
7		++			
umber of Items Reviewed		1	getables		Not sold in store
Non-Complying Item(s)	N	Code		Notes	
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Non-Complying Item(s)	I NO	Code		Notes	Not solu in store
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2		++			
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		1 1			
5		++			
<ul> <li>5</li> <li>7</li> </ul>					



Page 3:

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

Nur	mber of Item s Reviewed				hicken	Not sold in store
_	Non-Complying Item(s)	NC	Co	des	Notes	
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8						
4						
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8						
7						
Nur	mber of items Reviewed				b & Goat	Not sold in store
	Non-Complying item(s)	NC	Co I	aes I	Notes	
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8						
4						
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8						
7						
such	<ol> <li>What types of records used in the normal course of as signs, placards, and scale printers?</li> </ol>	of busin			Ifance with Recordkeeping Requi ecolved from suppliers that you rely on to o	
such	has signs, placards, and scale printers?	of busin				
Q2:	a s signs, p is cards, and scale printers?	of busin				
Q2:	has signs, placards, and scale printers?	of busin				
Q2:	a s signs, p is cards, and scale printers?				contred from suppliens that you rely on to o	rreat e your own labelis,
Q2: Q3: Q4 :	<ol> <li>as signs, p is cards, and scale printers?</li> <li>Where are records maintained?</li> <li>Where are records maintained?</li> <li>How long are records maintained?</li> <li>How long are records maintained?</li> <li>As the responsible stole authorty, please briefly epitance.</li> </ol>	explain y	your	kn ov	eselved from suppliens that you rely on to o	stems to ensure
Q22: Q23: Q24: Com	<ol> <li>as signs, placards, and scale printers?</li> <li>Where are records maintained?</li> <li>Where are records maintained?</li> <li>How long are records maintained?</li> </ol>	explain y	your	kn ov	eselved from suppliens that you rely on to o	stems to ensure
Q22: Q23: Q24: Com	as signs; p is cards, and scale printers?      Where are records maintained?      Where are records maintained?      How long are records maintained?      As the responsible stole authority, please brefly epishoe.      Would you be interested in receiving additional out	explain y	your	kn ov	eselved from suppliens that you rely on to o	stems to ensure



Page 4:

 Additional Items section

		A	ddi	tion	al Items
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Page 1:

 General Retailer and Reviewer information

 Non-Compliance Code Legend

	Agricultural Marketing Service	Origin Labeling Division		1400 Independence A Room 2620-\$, \$TOP ( Washington, DC 2025	0216 Check 0-0216 March 22, 20
Revi	Country o	f Origin Labeling (COOL)		tail Surveillance Foll wer's Name	ow up Review Checklist
Date	Reviewed		Revie	wer's Email	
8to r	e Nam e		Revie	wer's Phone Number	
8to r	e ID Number		Sto re	Representative	
Phy:	sioal Address		Respo	onsible Authority's Name	
City,	State ZIP		Respo	onsible Authority's Position	
	e Phone Number		Respo	onsible Authority's Email	
Conp Erma	orate Contact II		Findir	ngsidentified?	
		The results of this review are not o	offic la	amended through March 2, 20	16.
Code	Non-	Compliance Findings	Code		Compliance Findings
1	Covered commodity is	not identified with the country of origin.	8	The method of production declar	ation is not accurate at point of sale.
	The country of origin decisitation is not legible and/or is not placed in a conspicuous location.				
2			9	The method of production is not caught, farmed, farm-raised, etc	stated in an acceptable form. (i.e., wild, wild )
2	placed in a conspicuo			caught, farmed, farm-raised, etc	)
-	placed in a conspicuo The country of origin d The country of origin is	us location.	10	caught, farmed, farm-raised, etc	) n 5 business døys.
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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-Comp	olying i tem(s)		NCC	odes		Notes	
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Country of Origin (Store La	(bel):						
item Description (Store Re	cord):					Vière	records provided?
Country of Origin (Store Re	(broce						
Record Reviewed			Re	cord	Transaction ID / Reco	ord Details	
Pre-la bele di Packa ge Suppl	ler information:						
Retaller's immediate Previo	ous Supplier						
	ous Supplier		N	uts	& Ginseng		Not sold in store
Retailer's immediate Previo Information (Store Record) Number of Items Reviewed	ous Supplier		NC C		& Ginseng	Notes	Not sold in store
Retailer's immediate Previo Information (Store Record) Number of Items Reviewed	ous Supplier :					Notes	Not sold in store
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Page 3:

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

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Retailer's immediate Previo	ous Supplier						
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Page 4:

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

Number of Items Reviewed					hic ken		Not sold in store
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Retaller's immediate Previo	ous supplier						
information (Store Record)				_			
nformation (Store Record) Number of Items Reviewed					b&Goat	Natas	Not sold in store
nformation (Store Record) Number of Items Reviewed Non-Comp		N	Li C Co		b&Goat	Notes	Not sold in store
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nformation (Store Record) Number of Items Reviewed Non-Comp		N			b&Goat	Notes	Not sold in store
nformation (Store Record) Number of Items Reviewed Non-Comp 1		N			b & Goat	Notes	Not sold in store
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Information (Store Record) Number of Items Reviewed Non-Comp 1 2 3 4		N			b & Goat	Notas	Not sold in store
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Information (Store Record) Number of Items Reviewed Non-Comp 1 2 3 4		N			b&Goat	Notes	Not sold in store
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Intornation (store Revoted) Number of Itams Reviewed Non-Comp 1 2 3 4 5 6	i:   				b & Goat		Not sold in store
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Page 5:

 Additional Items section

		A	ddi	tion	al Items
	Non-Complying Item(s)	NC	Co	des	Notes
1					
2		_			
3		_			
4		_			
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6 7		_			
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#### Non-Compliance (NC) Codes



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#### 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.
<b>4</b> c	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.

#### USDA 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





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### USDA NC Code 1 – No Country of Origin

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

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

#### USDA 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.

#### USDA NC Code 1 – No Country of Origin

#### **Example:**







#### **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 <u>does not indicate</u> <u>COOL.</u>
- 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.

Code	Non-Compliance Findings
2	The country of origin declaration is not legible and/or is <b>not</b> 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.



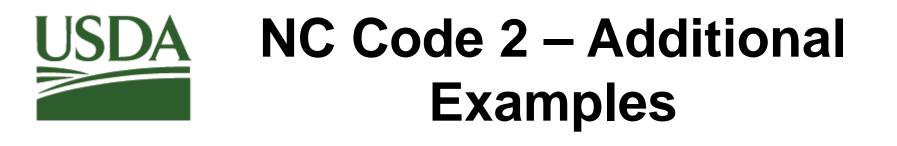




# NC Code 2 – Less than 50%

**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.





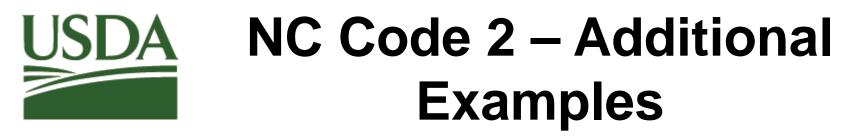
- Smeared printing making the country of origin illegible.
- The origin sign is located far away from the item it is referencing or too small to see.



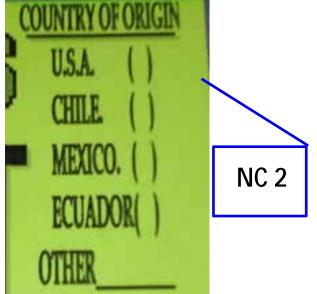
#### NC Code 2 – Smeared

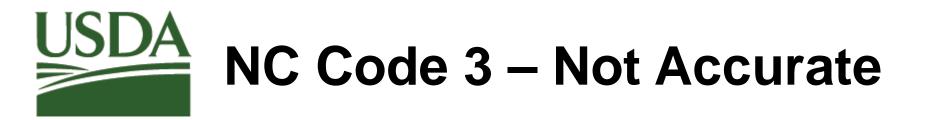
# **Example:** COOL information has rubbed off the sign.





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





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

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



- 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



**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.





#### **Example:**





USA	Leeks
Mexico	Lemons
USA	Lettuce





#### **Example:**









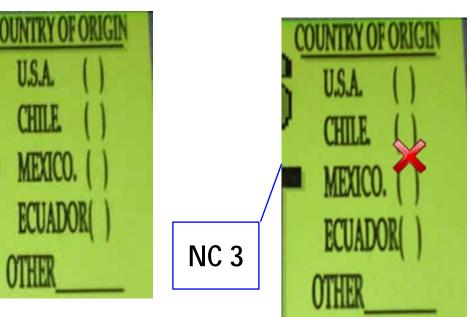


# NC Code 1, 2, & 3

NC Code 1: COOL is not listed.



NC Code 2: Checkbox with absent marking. NC Code 3: Checkbox with unclear marking.





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

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

Code	Non-Compliance Findings		
4a	The country of origin is <b>not</b> stated in an acceptable form. The use of "or" and "and/or" and "may contain" is <b>not</b> acceptable.		
4b	The country of origin is <b>not</b> stated in an acceptable form. The regional designation or the term, "locally grown" does <b>not</b> provide sufficient origin declaration.		
4c	The country of origin is <b>not</b> stated in an acceptable form. Production steps for meat muscle cuts are <b>not</b> present or not stated in an acceptable form.		



# NC Code 4a

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





# **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**









**Example:** The store sign states "Southern Grown". This location cannot be clearly identified.



#### **USDA** NC Code 4c – Production Steps

Meat muscle lacking accurate production step information (born, raised, harvested) are cited with NC code 4c.

Only applies to Chicken, Lamb, and Goat





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





## **Imported Meat**

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.





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

Code	Non-Compliance Findings	
	Abbreviations and variant spellings do <b>not</b> 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)



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

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



# Acceptable Method of Production

#### <u>Reminder:</u>

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

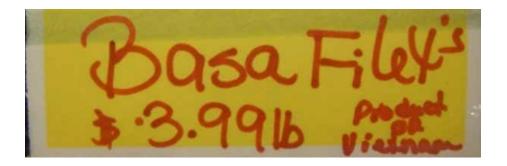


- An NC code 6 may be assigned irrespective of the presence or absence of country of origin.
- The MOP is not required to be near the origin declaration; they may be on opposite sides of the item (common for pre-labeled frozen items).



#### **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.

Code	Non-Compliance Findings	
7	The method of production declaration is not legible and/or is <b>not</b> 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.

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



## NC Code 8 – Inaccurate MOP

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





# **Example:** Store bar code label states "Wild Caught". Additional sticker states "Farm-

Raised".







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

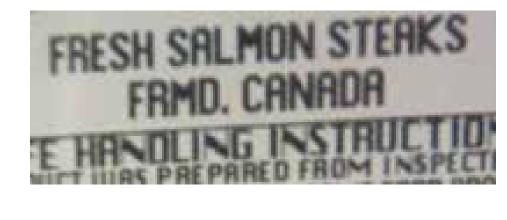
Code	Non-Compliance Findings	
	The method of production is <b>not</b> stated in an acceptable form. (i.e., wild, wild caught, farmed, farm-raised, etc.)	



## NC Code 9 – MOP Not Acceptable

# **Example:** Store signs below are examples of unacceptable MOP.









- There are instances when multiple NC codes on a single commodity are warranted.
- Multiple codes are <u>NOT</u> 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.



#### Example: NC code 1 and NC code 6 apply







#### Example: NC code 3 and NC code 5 apply





#### Example: NC code 2 and NC code 7 apply

COS Y		🖸 Wild	Caught	G Form
			R	TN
NABO		GREDIENTS	: Shrimp, Wal	er, Sodium odium Bisuli
Grown	Individually	HEAD	LESS	PEEL
Product of USA  Product of Thailand		□ U/12 □ 10/15	□ 31/35 □ 36/40 □ 41/50	□ 31/40 □ 51/60 □ 71/90
Product of Ecuador  Product of Ecuador		□ 16/20 □ 21/25	51/60	150/2
NET WT. 80 OZ. 15 2	BS.) 2.27 Kg	26/30	Fac	ts

# USDA 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 <b>not</b> provided within 5 business days.

# USDA 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 <u>records only</u> provided the retailer can accurately decipher it.

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

# USDA NC Code 12 – No MOP on Records

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

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

# USDA 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).

Code	Non-Compliance Findings
13	Records do <b>not</b> 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.

Code	Non-Compliance Findings
14	Records information for country of origin as provided by
	supplier is <b>not</b> 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.

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

## USDA 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.

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





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#### **Questions?**

