



Country of Origin Labeling



Recordkeeping Procedures

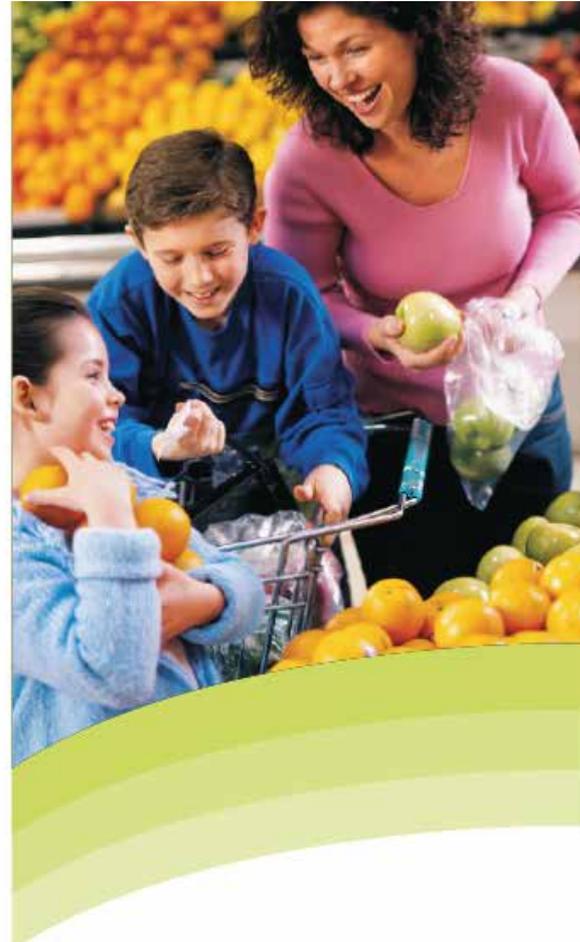


Overview

- Retailer's Recordkeeping Requirements
- Follow-up Retail Review Workbook
- Identifying Pre-labeled Commodities
- Conducting a Follow-up Review
- Requesting Records
- Recording Unique Identifiers



Retailer's Recordkeeping Requirements





Recordkeeping Requirements

- Retailers are required to maintain records used in the normal course of business that verify:
 - Country of origin
 - Method of production (fish & shellfish only)
 - Immediate previous supplier information (name, city, and state).

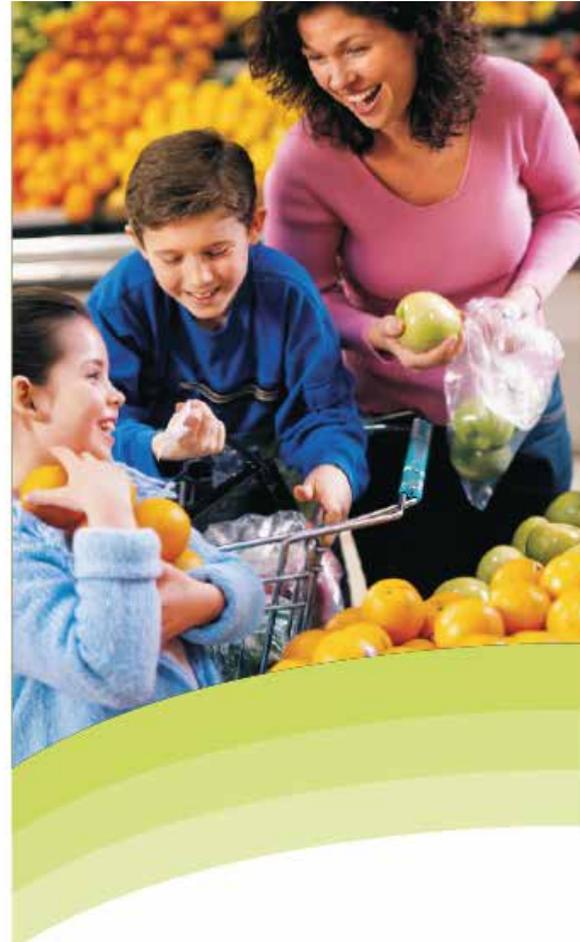


Recordkeeping Requirements

- Records for covered commodities must be maintained for 1 year from the date the origin declaration is made at retail.
- Records may be maintained in any location and in any format.
- Retailers have 5 business days to provide records.



Follow-up Retail Review Workbook





Retail Review Workbook

- There are 2 types of Retail Surveillance Reviews.
 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



Supplier Traceback Audits

- In addition to Initial and Follow-up Reviews the COOL Division also conducts Supplier Traceback Audits.
- Supplier Traceback Audits are initiated from the recordkeeping information obtained during follow-up reviews.



Supplier Traceback Audits Purpose

- Items are selected on a random basis.
- Auditors examine record documents provided by each supplier in the chain of commerce from the retail store to the initiator of country or origin and method of production claims to verify whether information is accurate and correctly transmitted through the supply chain.



Follow-up Retail Review

- **Retailer records will ONLY be required during the performance of a Follow-up Retail Review.**
- The Follow-up Retail Review workbook will include 6 recordkeeping sections for each commodity category.



Follow-up Review Workbook

Information Form Tab

	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.				



Follow-up Review Workbook

Checklist Tab

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, 2016. 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	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.	11	Records do not provide the country of origin information.	14	Records information for country of origin as provided by supplier is not accurately conveyed to point of sale label.
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.)	12	Records do not provide the method of production information.	15	Records information for method of production as provided by supplier is not accurately conveyed to point of sale label.
3	The country of origin declaration is not accurate at point of sale.	10	Records were not provided within 5 business days.	13	Records do not provide the Supplier information. (Supplier records are required for all transactions.)	16	Records that identify the chain of custody for the pre-labeled item 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.						
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.						
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):					Via 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):					Via 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				



How do I know if I am conducting a Follow-up Review?



Follow-up Retail Review File Name

Follow-up Retail Reviews will include an “**F**” before the 4 digit number in the file name. This indicates store location was reviewed previously and results warranted a follow-up retail review.

Example: TX 16 **F**9867



Pre-Labeled or Not





What is a pre-labeled covered commodity?





Pre-Labeled Definition

- A covered commodity that has the commodity's
 - country of origin,
 - method of production (when applicable), and
 - The supplier's name and place of business (city and state) of the manufacturer, packer, or distributor.



Location of Information

- The country of origin, method of production, and supplier information can be located:
 - On the covered commodity itself,
 - On the package in which it is sold to the consumer, or
 - On the master shipping container



Not Pre-Labeled

- The covered commodity is **NOT** a pre-labeled item if it is missing any of the following:
 - country of origin,
 - method of production (when applicable), and
 - The supplier's name and place of business (city and state) of the manufacturer, packer, or distributor.



Is this a Pre-labeled item?



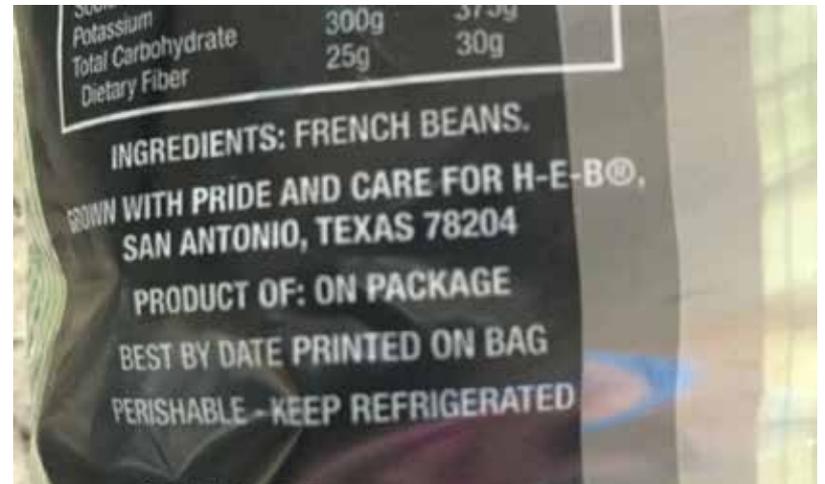


Is this a Pre-labeled item?

FRONT



BACK





Is this a Pre-labeled item?



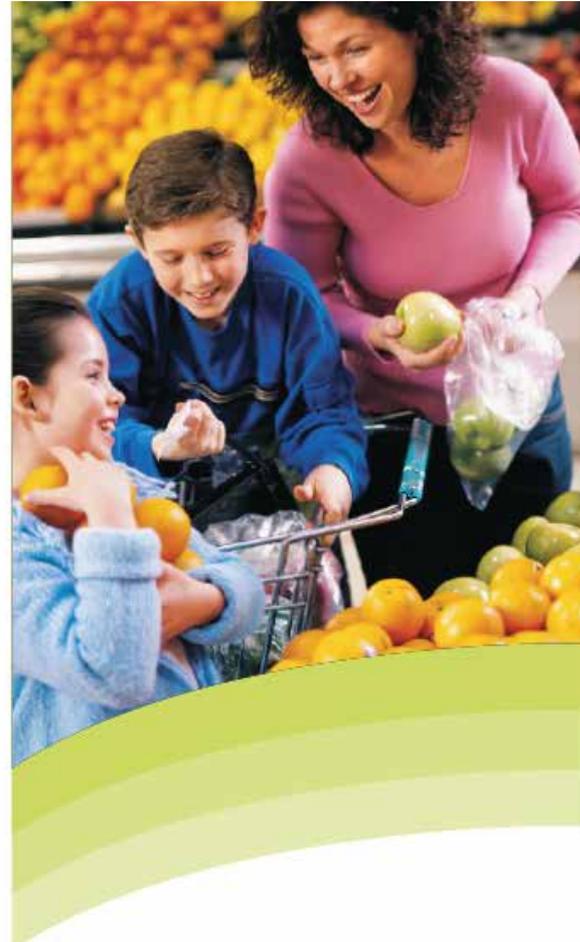


Is this a Pre-labeled item?





Conducting Follow-up Review





3 Step Process

Step 1: Review all COOL guidance documents and prepare the Workbook.

Step 2: Conduct COOL Surveillance Review at the retail establishment.

- **Part A:** Opening Meeting
- **Part B:** Conduct Review
- **Part C:** Recordkeeping (Follow-up reviews only)
- **Part D:** Closing Meeting

Step 3: Submit Workbook to USDA COOL Division.

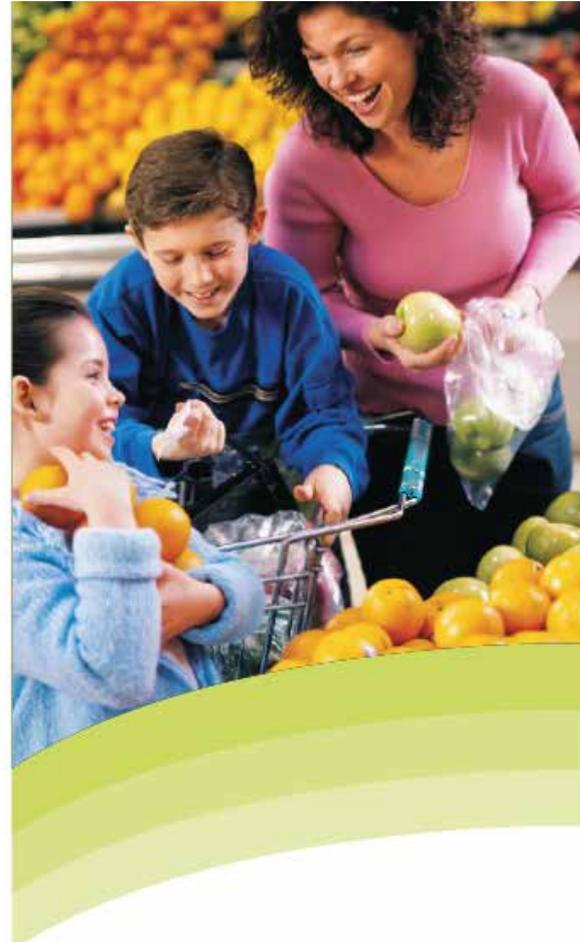


Opening Meeting

- During the opening meeting with the Retailer's Responsible Authority, advise them you will be requesting records for 6 covered commodities.
- Records can be provided at the time of the review or within 5 business days.



Requesting Records





Requesting Records

For FY16 records will be requested for all 6 commodity categories:

1. Fruits
2. Nuts & Ginseng
3. Vegetables
4. Fish & Shellfish
5. Chicken
6. Lamb & Goat



Recordkeeping Item

- Recordkeeping Items for follow-up reviews will be included with the FY16 Retail Review list.
- You will be provided with a total of 6 letters, one for every commodity category.

A	Fresh Fruits
B	Frozen Fruits
C	Peanuts
D	Pecans
E	Macadamia Nuts
F	Ginseng
G	Fresh Vegetables
H	Frozen Vegetables
I	Fresh Fish
J	Frozen Fish
K	Fresh Shellfish
L	Frozen Shellfish
M	Chicken Muscle Cuts
N	Ground Chicken
O	Goat Muscle Cuts or Ground Goat
P	Lamb/Mutton Muscle Cuts or Ground Lamb



Requesting Records: Pre-Labeled Item

- For **Pre-labeled items**, retailers must provide record that identifies:
 - The Retailer's Immediate Previous Supplier (name, city and state)
- The record is not required to have the country of origin or method of production because that is printed on the pre-labeled item.



Requesting Records: Non Pre-Labeled Item

- For items that are **NOT Pre-labeled**, retailer must provide a record that identifies the:
 - Country of origin,
 - Method of production (when applicable), and
 - Retailer's immediate previous supplier (name, city and state).



Requesting Records

Multiple records may be provided to verify country of origin, method of production and immediate previous supplier.

Example: For a Non pre-labeled item, the retailer provided the following records:

- ü Invoice with the Retailer's Supplier Name, City, and State.

- ü Shipping Manifest with the country of origin and method of production.



What if the record item assigned is not sold in store?





Record Item Assigned

- If the record item assigned is not sold in store, skip to the next letter within the commodity category color.

A	Fresh Fruits
B	Frozen Fruits
C	Peanuts
D	Pecans
E	Macadamia Nuts
F	Ginseng
G	Fresh Vegetables
H	Frozen Vegetables
I	Fresh Fish
J	Frozen Fish
K	Fresh Shellfish
L	Frozen Shellfish
M	Chicken Muscle Cuts
N	Ground Chicken
O	Goat Muscle Cuts or Ground Goat
P	Lamb/Mutton Muscle Cuts or Ground Lamb



Recordkeeping Item Assigned

Example:

COOL Division assigned records to be requested for the letters A, D, H, K, M, and O.

- O-Goat Muscle Cuts or Ground are not sold in store
- P-should be chosen as the replacement

A	Fresh Fruits
B	Frozen Fruits
C	Peanuts
D	Pecans
E	Macadamia Nuts
F	Ginseng
G	Fresh Vegetables
H	Frozen Vegetables
I	Fresh Fish
J	Frozen Fish
K	Fresh Shellfish
L	Frozen Shellfish
M	Chicken Muscle Cuts
N	Ground Chicken
O	Goat Muscle Cuts or Ground Goat
P	Lamb/Mutton Muscle Cuts or Ground Lamb



What if the store does not sell any items listed in the commodity category?





Commodity Category Not Sold In Store

- If the store does not sell any items for the commodity category, place an X in the “Not Sold in Store” field corresponding to the commodity category.

Number of Items Reviewed	Lamb & Goat			Not sold in store	X
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				



What if Retailer cannot provide records at the time of the follow-up review?





Records Request Form

- If the retailer cannot provide records at the time of the follow-up review, fill out the Records Request Form and leave it with the Responsible Authority at the time of your closing meeting.

 **COOL Retail Records Request Form**

Providing records for Country of Origin Labeling (COOL) is EASY, just follow these steps!

Step 1: Review the items listed in the following table where records are required. All records must be provided to the Reviewer within **5 business days**.

File Name:	Due Date:
#	Item Name & Description
	<small>(e.g., House Brand, Ready to Eat Green Beans, 1lb size, Prod. Of Mexico, 1lb. In Green with Pride San Antonio, TX)</small>
1	
2	
3	
4	
5	
6	

Step 2: Identify the information that must be included on the record.

- For items that are **NOT pre-labeled**, records must identify the covered commodity, country of origin, method of production (for fish and shellfish items only), and your immediate previous supplier's name and location (minimum of city and state).
- For items that **ARE pre-labeled**, records must identify the covered commodity your immediate previous supplier's name and location (minimum of city and state).

Step 3: Submit records via e-mail or fax to the contact below. **Be sure to include the file name.**

Reviewer's Name:

Fax Number:

E-mail:

Thank You!



Records Request Form

- Retailer's Responsible Authority is required to provide records within 5 business days from the request.
- Day 1 begins the day after the review is conducted.

Example: Follow-up review was conducted on Tuesday, July 5, 2016. Records will be due on Tuesday, July 12, 2016.

A small calendar for the month of July 2016. The days of the week are abbreviated as Su, Mo, Tu, We, Th, Fr, Sa. The dates 3, 4, 10, 17, 24, and 31 are highlighted in red. The dates 5, 6, 7, 8, 9, 11, 12, 13, 14, 15, 16, 18, 19, 20, 21, 22, 23, 25, 26, 27, 28, 29, and 30 are in black. The date 1 is in blue. The date 2 is in black. The date 12 is highlighted in red, indicating the due date for records.

July						
Su	Mo	Tu	We	Th	Fr	Sa
					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
31						



What records would be required?



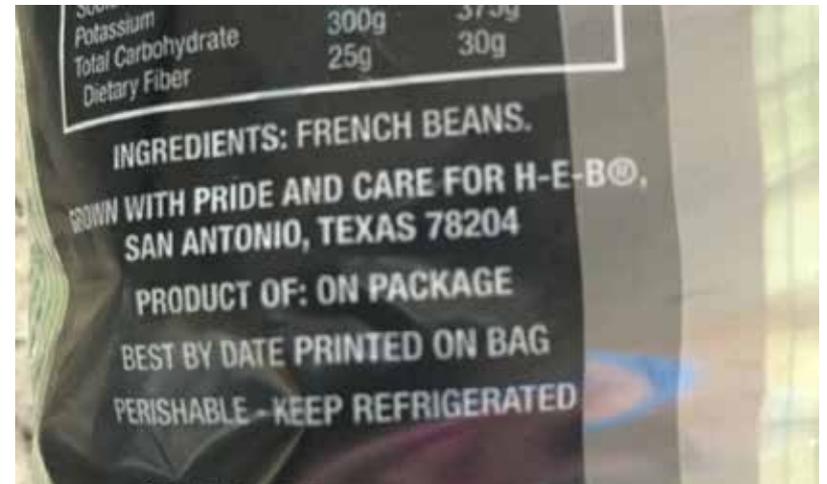


What records would be required?

FRONT



BACK





What records would be required?





What records would be required?





Recording Unique Identifiers





Were Records Provided

- Select Yes, if records were provided within 5 business days from the date the review was conducted.
- Select No, if records were NOT provided within 5 business days from the date the review was conducted.

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):	YES
Record Reviewed	Record Transaction ID / Record Date
	YES NO



Actual Group Reviewed

- Select Actual Group Reviewed by using the drop down field.

Recordkeeping	
Item Description (Store Label):	Actual Group Reviewed:
Country of Origin (Store Label):	
Item Description (Store Record):	C-Peanuts D-Pecans E-Macadamia Nuts F-Ginseng
Country of Origin (Store Record):	
Record Reviewed	Record Transaction ID / Record Details
Supplier Information (Pre-labeled Packag	
Retailer's Immediate Previous Supplier Information (Store Record):	



Item Information

- Enter Item Description and Country of Origin located on store label.
- Enter Item Description and Country of Origin located on record provided.

Recordkeeping			
Item Description (Store Label):		Raw Spanish Peanuts	Actual Group Reviewed:
Country of Origin (Store Label):		USA	C-Peanuts
Item Description (Store Record):		Raw Spanish Peanuts in bulk fresh	Were records provided?
Country of Origin (Store Record):		Georgia, USA	
Record Reviewed	Record Transaction ID / Record Details		



Records Received

- Select Record Reviewed by using the drop down field.
- Workbook will allow you to enter information for up to 3 records.

Recordkeeping		
Item Description (Store Label):	Raw Spanish Peanuts	Actual Group Reviewed:
Country of Origin (Store Label):	USA	C-Peanuts
Item Description (Store Record):	Raw Spanish Peanuts in bulk fresh	Were records provided?
Country of Origin (Store Record):	Georgia, USA	YES
Record Reviewed	Record Transaction ID / Record Details	
Master Container Label		
Invoice		
Supplier Information (Pre-labeled Package):		
Retailer's Immediate Previous Supplier Information (Store Record):		



Transaction ID

- The Record Transaction ID field is very important!
- The data entered in the Record Transaction ID field will be used to conduct Supplier Traceback Audits.
- Enter any information that is unique to the commodity and can help ensure traceability.
 - Invoice #
 - PO #
 - Order #
 - Delivery Date
 - Establishment #
 - Brand name
 - Pack date
 - Lot number
 - Package size
 - UPC # & PLU #
 - Production #
 - Item #
 - Best if used by date



Records Received

- Enter Record Transaction ID's obtain from records.

Recordkeeping		
Item Description (Store Label):	Raw Spanish Peanuts	Actual Group Reviewed:
Country of Origin (Store Label):	USA	C-Peanuts
Item Description (Store Record):	Raw Spanish Peanuts in bulk fresh	Were records provided?
Country of Origin (Store Record):	Georgia, USA	YES
Record Reviewed	Record Transaction ID / Record Details	
Master Container Label	Best buy date 1/1/2017; Lot #1234; Establishment #456; UPC#0000005; 40lb total wt.	
Invoice	Invoice #987; Invoice Date: 8/1/2016; PO #5655; Delivery Date: 7/27/16; Item #111	
Supplier Information (Pre-labeled Package):		
Retailer's Immediate Previous Supplier Information (Store Record):		



Supplier Information (Pre-Labeled Package)

- In the Supplier Information (Pre-Labeled Package) field, enter the information found on the pre-labeled package.
- This field applies to Pre-labeled items only.

Recordkeeping		
Item Description (Store Label):	Raw Spanish Peanuts	Actual Group Reviewed:
Country of Origin (Store Label):	USA	C-Peanuts
Item Description (Store Record):	Raw Spanish Peanuts in bulk fresh	Were records provided?
Country of Origin (Store Record):	Georgia, USA	YES
Record Reviewed	Record Transaction ID / Record Details	
Master Container Label	Best buy date 1/1/2017; Lot #1234; Establishment #456; UPC#0000005; 40lb total wt.	
Invoice	Invoice #987; Invoice Date: 8/1/2016; PO #5655; Delivery Date: 7/27/16; Item #111	
Supplier Information (Pre-labeled Package):	Packaged by P-Nut Company, Atlanta, GA	
Retailer's Immediate Previous Supplier Information (Store Record):		



Supplier Information (Pre-Labeled Package)

- If recordkeeping item is NOT Pre-labeled enter "N/A" in the Supplier Information (Pre-Labeled Package) field.

Recordkeeping		
Item Description (Store Label):	Raw Spanish Peanuts	Actual Group Reviewed:
Country of Origin (Store Label):	USA	C-Peanuts
Item Description (Store Record):	Raw Spanish Peanuts in bulk fresh	Were records provided?
Country of Origin (Store Record):	Georgia, USA	YES
Record Reviewed	Record Transaction ID / Record Details	
Master Container Label	Best buy date 1/1/2017; Lot #1234; Establishment #456; UPC#0000005; 40lb total wt.	
Invoice	Invoice #987; Invoice Date: 8/1/2016; PO #5655; Delivery Date: 7/27/16; Item #111	
Supplier Information (Pre-labeled Package):	N/A	
Retailer's Immediate Previous Supplier Information (Store Record):		



Retailer's Immediate Previous Supplier Information (Store Record)

- For the Retailer's IPS Supplier Information (Store Record) field enter the information for the supplier that directly delivered commodity to the retailer.
- This field should ALWAYS be completed because it applies to BOTH pre-labeled and non pre-labeled recordkeeping commodities.



Retailer's Immediate Previous Supplier Information (Store Record)

- Include additional information such as supplier phone number, fax, email, and website, if provided on record.

Recordkeeping		
Item Description (Store Label):	Raw Spanish Peanuts	Actual Group Reviewed:
Country of Origin (Store Label):	USA	C-Peanuts
Item Description (Store Record):	Raw Spanish Peanuts in bulk fresh	Were records provided?
Country of Origin (Store Record):	Georgia, USA	YES
Record Reviewed	Record Transaction ID / Record Details	
Master Container Label	Best buy date 1/1/2017; Lot #1234; Establishment #456; UPC#0000005; 40lb total wt.	
Invoice	Invoice #987; Invoice Date: 8/1/2016; PO #5655; Delivery Date: 7/27/16; Item #111	
Supplier Information (Pre-labeled Package):	Packaged by P-Nut Company, Atlanta, GA	
Retailer's Immediate Previous Supplier Information (Store Record):	ABC Wholesale Company, Houston, TX; Fax #(101) 222-3333; Phone #(101) 555-6666	



Complete all recordkeeping sections as thoroughly as possible! The more information provided the easier it will be to conduct a traceback audit.



Part C – Invoice Sample

Invoice 1567

Penguin International

1010 East Main Street Normal, WA. 45697
Phone 345-456-0023
Fax 345-456-0978



Date

March 24, 2016

Date Delivered:

March 25, 2016

To

G & G Markets
5078 Muxxy St.
Party, WA. 45698

Ship To

G & G Markets
7890 West Street
Serious, WA. 45687

Instructions

[Add additional instructions]



Quantity	Description	Unit Price	Total
2	35/50 "Big Penguin Brand" 10lb. Shrimp USA/Wild	100.00	200.00

- Supplier's Name and Address
- Invoice Number
- Delivery Date
- Invoice Date
- Country of Origin
- MOP



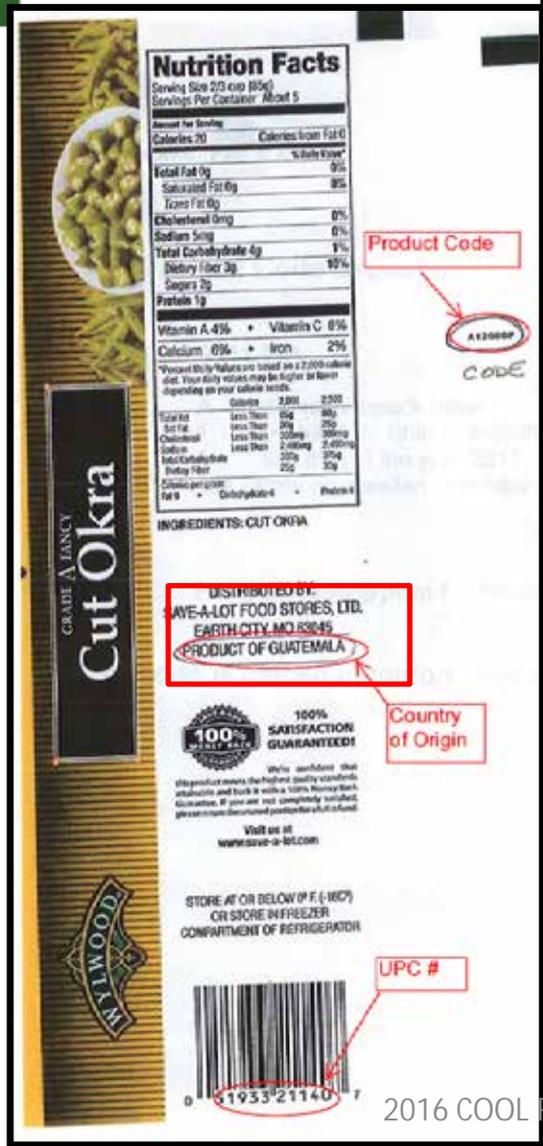
Part C – Master Container



- Box Serial #:2762060
- Pack Date: 4/06/15
- Establishment #: 244C
- 09615CNC0117 01
- Net Weight lbs. 15.4
- Use by: 4/27/15

*If you are not sure what a number is, just write it down.

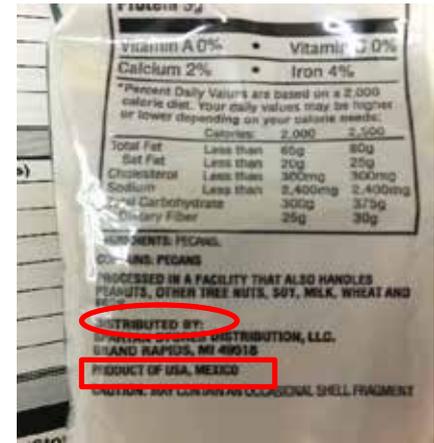
Part C – Consumer Package



- Product Code: A12080P
- UPC: 051933 21140 7
- Distributed by: Save-A-Lot Foods Store, LTD, Earth City, MO 63015
- Product of Guatemala
- Best by: may be listed
- Product size: may be listed



Part C – Consumer Package



- Product: Pecans chopped
- Best By: 10/22/2015
- Lot: 29545B
- UPC: 011213025919
- Distributed By: Spartan Stores Distribution Grand Rapids, MI. 49518
- COO: Product of USA, Mexico

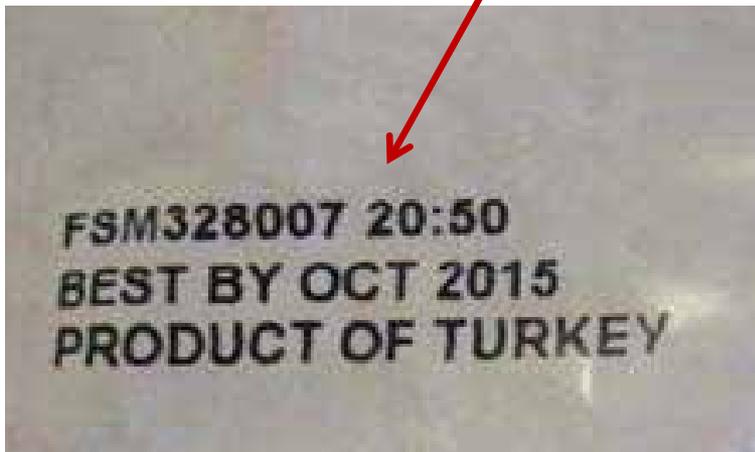


Part C – Consumer Package



- **Product Description:**

- Red Tart Cherries
- pitted
- Net Wt. 20 oz.



- **Product Code:**

- FSM328007 20:50
- Best by Oct 2015
- Product of Turkey



Recordkeeping Section Complete



Recordkeeping		
Item Description (Store Label):	Raw Spanish Peanuts	Actual Group Reviewed:
Country of Origin (Store Label):	USA	C-Peanuts
Item Description (Store Record):	Raw Spanish Peanuts in bulk fresh	Were records provided?
Country of Origin (Store Record):	Georgia, USA	YES
Record Reviewed	Record Transaction ID / Record Details	
Master Container Label	Best buy date 1/1/2017; Lot #1234; Establishment #456; UPC#0000005; 40lb total wt.	
Invoice	Invoice #987; Invoice Date: 8/1/2016; PO #5655; Delivery Date: 7/27/16; Item #111	
Supplier Information (Pre-labeled Package):	Packaged by P-Nut Company, Atlanta, GA	
Retailer's Immediate Previous Supplier Information (Store Record):	ABC Wholesale Company, Houston, TX; Fax #(101) 222-3333; Phone #(101) 555-6666	



Step 1 – Complete Recordkeeping Section

Recordkeeping		
Item Description (Store Label):	Catfish Fillets	Actual Group Reviewed:
Country of Origin (Store Label):	USA	J-Frozen Fish
Method of Production (Store Label):	Farmed Raised	
Item Description (Store Record):	Fillets Catfish IQF	Were records provided?
Country of Origin (Store Record):	US	YES
Method of Production (Store Record):	Farmed Raised	
Record Reviewed	Record Transaction ID / Record Details	
Pre-labeled Package-Consumer Ready	Lot #630123; Best by Date: 5/18/2017; 16oz. UPC #4863	
Invoice	Invoice #0458260; Invoice Date: 05/18/2017	
Supplier Information (Pre-labeled Package)	Packed By: Seafood Connection St. Joseph, Missouri 64505	
Retailer's Immediate Previous Supplier Information (Store Record):	XYZ Wholesale Grocers 63331 Old Military Rd. Pearl River, LA 70452	



Follow-up Review Overview

Preparation for Review

- Review COOL Regulation and Retail Review Procedures
- Prepare your Workbook

Conduct Review

- Opening Meeting
- Review all 6 commodity categories for labeling non-compliances
- Take pictures of all non-compliances
- **Request recordkeeping information** ←
- Closing Meeting

Submit Review

- Complete workbook by entering any recordkeeping information submitted by the retailer within the 5 business days.
- Organize, label, and consolidate pictures in one file
- Submit Workbook to USDA



How could the Recordkeeping be improved?

Recordkeeping		
Item Description (Store Label):	Yams, Red (Sweet Potato)	Actual Group Reviewed:
Country of Origin (Store Label):	USA	G-Fresh Vegetables
Item Description (Store Record):	Garnet Red Yams	Were records provided?
Country of Origin (Store Record):	USA	YES
Record Reviewed	Record Transaction ID / Record Details	
Master Container Label	Net Wt.:40lbs	
Store Log	Invoice # 14801160; Invoice Date: 5/25/2015; Item #53409	
Supplier Information (Pre-labeled Package):	AV Jones, 39 Sultana Drive, Bridge CA 95301-9605, (209) 394-7514, avdsfdfsf@produce.com	
Retailer's Immediate Previous Supplier Information (Store Record):		



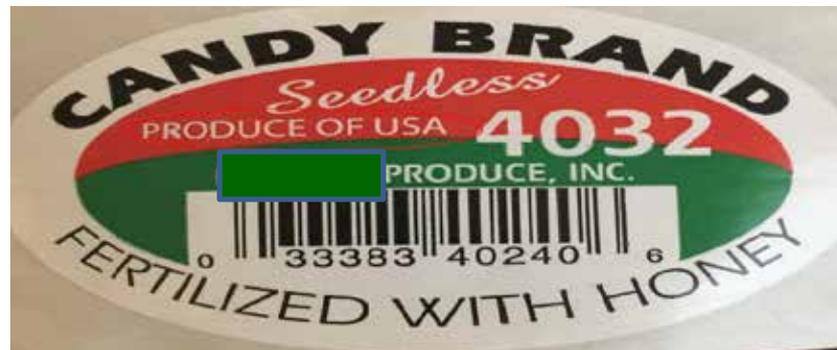
How could the Recordkeeping be improved?

Recordkeeping		
Item Description (Store Label):	Raw Shrimp	Actual Group Reviewed:
Country of Origin (Store Label):	Store sign and pre-labeled package: India	L-Frozen Shellfish
Method of Production (Store Label):	Store sign and pre-labeled package: Farm Raised	
Item Description (Store Record):	31-40 Headless S-On "EZP"	Were records provided?
Country of Origin (Store Record):	Invoice: Indonesia	YES
Method of Production (Store Record):	Farm Raised	
Record Reviewed	Record Transaction ID / Record Details	
Invoice	Invoice #18492, Date 7/16/15	
Supplier Information (Pre-labeled Packag		
Retailer's Immediate Previous Supplier Information (Store Record):	Seemore Foods 2828 Spangler Rd, Dallas, TX. 75220 (214)	



How could the Recordkeeping be improved?

T19597



Recordkeeping		
Item Description (Store Label):	Whole Watermelon	Actual Group Reviewed:
Country of Origin (Store Label):	Produce of USA	A-Fresh Fruits
Item Description (Store Record):	45 ct SLS WM 06/17/2015	Were records provided?
Country of Origin (Store Record):	Produce of USA	YES
Record Reviewed	Record Transaction ID / Record Details	
Master Container Label	45 ct SLS WM 06/17/2015	
Pre-labeled Package Supplier Information		
Retailer's Immediate Previous Supplier Information (Store Record):	MIG Sweet Produce Inc LaBelle, FL 33975	



How could the Recordkeeping be improved?

Recordkeeping		
Item Description (Store Label):	Garlic (bulk)	Actual Group Reviewed:
Country of Origin (Store Label):	Product of Argentina	G-Fresh Vegetables
Item Description (Store Record):	Garlic - Super Colossal	Were records provided?
Country of Origin (Store Record):	UCH	YES
Record Reviewed	Record Transaction ID / Record Details	
Invoice	Order #4747429; Item Code 76401F	
Supplier Information (Pre-labeled Packag		
Retailer's Immediate Previous Supplier Information (Store Record):	Bizzie's, Inc 2828 Schoolhouse Blvd, Seaport, CT 06410	



Questions?

