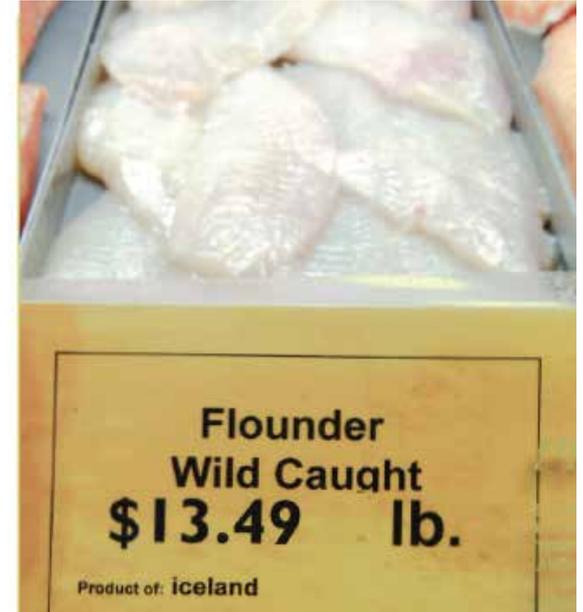




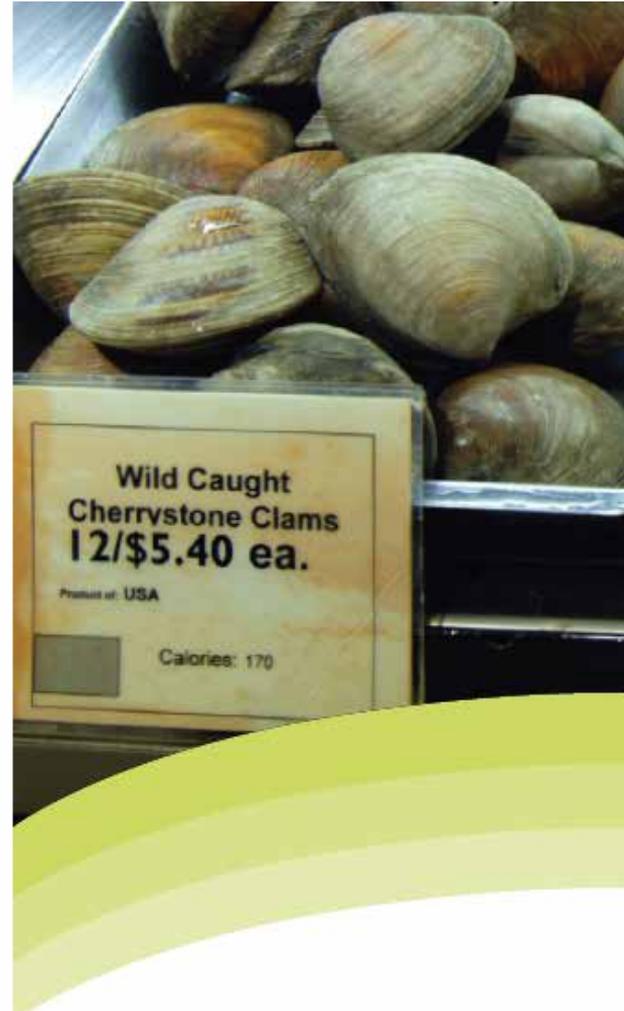
Country of Origin Labeling



Retail Review Procedures



Conducting Retail 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.



Step 1:

**Review COOL Requirements and
Prepare Workbook**



Refresh Your Skills

Do Your Homework! 

- Review:
 - üFinal Rule, 7 CFR Parts 60 and 65
 - ü7 CFR Final Rule and amendments published:
 - January 15, 2009
 - May 23, 2013
 - March 2, 2016



Refresh Your Skills (cont.)

- Review :
 - üNC Codes that apply to the Retail Review (Initial or Follow-up) being conducted.
 - üPrevious Year's Workbook and retailer response, if review is a follow-up. Previous year's workbook must be reviewed to verify retailer has corrected all findings identified.



Training Materials

- All COOL training materials will be posted to the COOL website:

www.ams.usda.gov/cool

Education & Training

<p>Country of Origin Labeling (COOL)</p> <ul style="list-style-type: none">OverviewPacked Honey COOLQuestions & AnswersEducation & TrainingCompliance & Enforcement	<p>Education & Training</p> <ul style="list-style-type: none">• Letter to Industry from April 5, 2012 <p>COOL Outreach Brochures</p> <ul style="list-style-type: none">• Consumer (pdf)• Retailer (pdf)• Supplier (pdf)	<p>News & Announcements</p> <ul style="list-style-type: none">• 02/29 USDA Amends Country of Origin Labeling Requirements, Final Rule Repeals Beef and Pork Requirements• 12/18 Statement from Agriculture Secretary Tom Vilsack on the Country of Origin Labeling Requirements for
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Download Workbook

- COOL Initial and Follow-up retail review workbook will be posted to the COOL website:

www.ams.usda.gov/cool

Forms

Country of Origin Labeling (COOL)	COOL Forms	News & Announcements
<ul style="list-style-type: none">OverviewPacked Honey COOLQuestions & AnswersEducation & TrainingCompliance & EnforcementOther Federal Agency Rulings Related to COOL	<ul style="list-style-type: none">• 2016 COOL Workbook for Follow Up Reviews (xls)• 2016 COOL Initial Retail Review Workbook (xls)• View and update the COOL Corporate Contact Designation Form• View the COOL Request for Reimbursement (state agencies only) Form – SF-270 (pdf)	<ul style="list-style-type: none">• 03/23 USDA Seeks Nominees for United Sorghum Checkoff Program Board• 03/16 USDA Seeks Nominees for American Lamb Board• 03/15 USDA Proposes to Amend the Beef Promotion and Research Order; Invites Public Comments
Forms	2016 COOL Retail Review Training	View all news & announcements >



Workbook Overview

- Both the Initial and Follow-up Workbook (Excel) contain two (2) tabs:
 - 1. Information Form** – includes summary of regulatory requirements and possible findings.
 - 2. Checklist** – includes findings (and recordkeeping, if applicable)



Workbook Overview – Checklist Tab

- Initial Review Checklist



- Follow-up Review Checklist





Workbook Overview – Checklist Tab

**Information entered in the Review
Checklist tab will automatically populate
in the Information Form.**



Initial Retail Review Workbook

	Agricultural Marketing Service	Country of Origin Labeling Division	1400 Independence Avenue, SW. Room 2620-S, STOP 0216 Washington, DC 20250-0216	Spell Check	Checklist
	March 22, 2016				
Country of Origin Labeling (COOL) Retail Surveillance Initial 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><i>This review is conducted in accordance with the requirements contained in the Mandatory Country of Origin Labeling Final Rule Title 7 CFR Part 60 and 65, as amended through March 2, 2016.</i></p> <p><i>The results of this review are not official until reviewed by the COOL Division Director.</i></p>					



Follow-up Retail Review Workbook

 Agricultural Marketing Service		Country of Origin Labeling Division	1400 Independence Avenue, SW. Room 2620-S, STOP 0216 Washington, DC 20250-0216	<input type="button" value="Spell Check"/>	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><i>This review is conducted in accordance with the requirements contained in the Mandatory Country of Origin Labeling Final Rule Title 7 CFR Part 60 and 65, as amended through March 2, 2016.</i></p> <p><i>The results of this review are not official until reviewed by the COOL Division Director.</i></p>					



Prepare Workbook

- The retail store assignment list provides the following:
 - Review Number (i.e., AZ 16 F0245 or FL 16 N1023)
 - Retailer Name, Address, and Phone Number
- Type this information in the top portion of the workbook.
- Also type your name and contact information.
- Save



Workbook File Name

- Save workbook with the file name assigned by COOL that will include the following:
 - üState Initials (TX)
 - üFiscal Year (16)
 - üReview Number – 4 digit (9867)



Initial Retail Review File Name

Initial Retail Reviews will include an “N” before the 4 digit number in the file name. This indicates store location was not reviewed the previous year.

Example: AL 16 N0351



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 another review.

Example: TX 16 F9867



Step 1 -Complete



Review COOL Requirements and Prepare Workbook

	Agricultural Marketing Service	Country of Origin Labeling Division	1400 Independence Avenue, SW. Room 2620-S, STOP 0216 Washington, DC 20250-0216	Spell Check	Checklist
March 22, 2016					
Country of Origin Labeling (COOL) Retail Surveillance Follow up Review Checklist					
Review Number	UT 16 F2344	Reviewer's Name	John Doe		
Date Reviewed	9/1/2016	Reviewer's Email	jdoe@dc.gov		
Store Name	ABC Retailer	Reviewer's Phone Number	(202) 720-8846		
Store ID Number	123	Store Representative			
Physical Address	50 Main Street	Responsible Authority's Name			
City, State ZIP	Salt Lake City, Utah 84103	Responsible Authority's Position			
Store Phone Number	(111) 222-3333	Responsible Authority's Email			
Corporate Contact Email		Findings Identified?			
<p><i>This review is conducted in accordance with the requirements contained in the Mandatory Country of Origin Labeling Final Rule Title 7 CFR Part 60 and 65, as amended through March 2, 2016.</i></p> <p><i>The results of this review are not official until reviewed by the COOL Division Director.</i></p>					



Step 2:

Conduct Retail Surveillance Review



USDA Recommendation

New Reviewers are encouraged to shadow an experienced reviewer at least once.

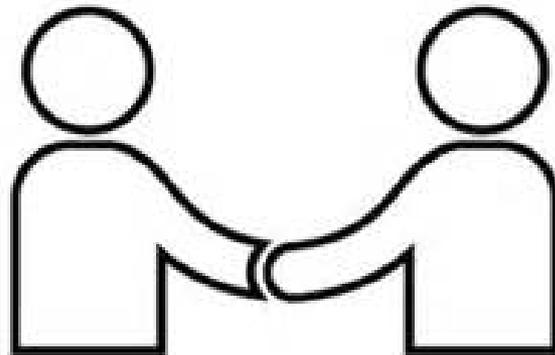


Step 2 – Conducting Review

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



Step 2:
Part A: Opening Meeting





Part A: Opening Meeting

Upon arrival at the retail store, the reviewer shall:

- Introduce themselves as a representative of USDA with an official picture identification.
- Request a meeting with the store manager, counter manager, or other appropriate official



Part A: Opening Meeting

Conduct a short meeting with the responsible authority.

- Explain the scope and objective of the review.
- Provide a short summary of what you will be looking for by providing a copy of the **Information Sheet**



Part A: Opening Meeting

The **Information Sheet** will provide a summary of regulatory requirements, types of findings, and COOL Division contact information.

	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	3/11/2016	Store Name	ABC Retailer	
Reviewer's Name	John Doe	Store Address	50 Main Street	
File Name	UT 16 F2344	City, State Zip	Salt Lake City, Utah 84103	
COOL Website	www.ams.usda.gov/cool	COOL E-mail Address	COOLAudit@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 packaging, 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.				



Part A – Opening Meeting

Follow-up Review

If a follow-up review is being conducted, advise responsible authority of the following:

- Records will be requested during the retail review.
- The items selected for records are chosen at random.
- Records can be maintained at the retail store or in a remote location.
- If needed retailer has 5 business days to provide records.



Part A: Opening Meeting

Follow-up Review

Advise Responsible Authority:

- A follow-up review is being conducted because of previous noncompliance's observed. Note: If the retailer failed to respond to the previous findings, inform them they are responsible for responding to the noncompliance letter mailed by USDA.



Warning!

- Do not confront an angry, belligerent or non-cooperative facility representative!!
- If the facility representative refuses to cooperate with the review, contact your state COOL Manager with the information.



Store Closed

If the store is closed upon arrival:

- Take a picture of the front of the store.
- Submit the workbook with the File Name, Date Reviewed, Store Information, and Reviewer's Information.
- Select "Store Closed" in the "Finding Identified?" field.
- In the Comments section, describe store was closed upon arrival.



Store Closed: Submit Workbook

	Agricultural Marketing Service	Country of Origin Labeling Division	1400 Independence Avenue, SW, Room 2620-S, STOP 0216 Washington, DC 20250-0216	Spell Check	Checklist
				March 9, 2016	
Country of Origin Labeling (COOL) Retail Surveillance Follow up Review Checklist					
Review Number	UT 16 F2344A	Reviewer's Name	John Doe		
Date Reviewed	3/3/2016	Reviewer's Email	j.doe@dc.gov		
Store Name	BCA Retailer	Reviewer's Phone Number	(202) 720-8846		
Store ID Number	321	Store Representative			
Physical Address	50 Main Street	Responsible Authority's Name			
City, State ZIP	Salt Lake City, Utah 84103	Responsible Authority's Position			
Store Phone Number	(111) 222-3333	Responsible Authority's Email			
Corporate Contact Email		Findings Identified?	<div style="border: 2px solid red; border-radius: 50%; padding: 5px; display: inline-block;"> Store Closed </div>		



Retailer Changed Ownership

If the store changed ownership or name:

- Take a picture of the front of the store, if review is a follow-up review.
- Ask Responsible Authority the details of the store name change (i.e., When did ownership change?).
- In the Comments section, record the details provided by the responsible authority.
- Proceed to conduct the review.



Part A: Opening Meeting

- Ask responsible authority to verify the store name, address, and phone information are correct.
- Request:
 - Store Representative Name
 - Responsible Authority Name
 - Corporate Contact E-mail (if any)
 - Responsible Authority's Store E-mail Address (if any)



Part A: Opening Meeting

Answer Questions

- Answer any questions pertaining to the review or the COOL regulation.
- Inform the store representative that they are welcome to accompany you during the review.



Part A: Opening Meeting

Answer Questions

- Ask store representative who you should request records from (i.e., meat manager)
- Confirm the time and place for the closing meeting.
- Findings of non-compliance are considered unofficial until evaluated by USDA.



Step 2:

Part B: Conduct **Initial** Review



Part B: Conduct Review

Initial Review

- COOL Reviewers will document non-complying items and their NC code(s) in the appropriate initial review workbook.
- Initial reviews contain 6 commodity categories for which the reviewer must document non-complying items.



Part B: Conduct Review

Initial Review

Review all 6 covered commodity categories:

- Produce Department (fresh and frozen fruits and vegetables; ginseng)
- Baking Aisle (nuts: raw peanuts, pecans, macadamia nuts)
- Meat Department (fresh and frozen lamb, goat, chicken)
- Seafood Department (fresh and frozen fish and shellfish)



Part B: Conduct Review

Initial Review

Including all locations:

- Full-service counters
- Frozen items display cases
- Self-service areas, sale counters and promotional displays





Part B: Conduct Review

Initial Review

Not Sold In Store

- If no commodities were present in a given section, apply an X in the “Not sold in store” field.

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



Part B: Conduct Review

Initial Review

Enter Number of Items Reviewed. This is the total number of commodities reviewed for the section.

Example: Retail store sold Gala apples, Fiji apples, Granny Smith apples, and Red Delicious apples in the fruit section. A total of 4 items reviewed will be recorded in the fruits section.

Number of Items Reviewed		Fruits			Not sold in store
Non-Complying Item(s)		NC Codes		Notes	
1	Gala Apples	1			
2					
3					
4					



Part B: Conduct Review

Initial Review

Record Findings

The more information the better!

- Gala Apples, sold in bulk
- Oranges, 5 lb bags
- Frozen Dole Strawberries, 1.5 lb best by 8/2010
- Previously Frozen Whole Salmon in Fresh Cooler



Part B: Conduct Review

Initial Review

Record Findings

- Describe the item in the non-complying items(s) column of the workbook.
- Record the applicable NC code(s).
- **Reminder**: There may be more than one NC code per item.



Part B: Conduct Review

Initial Review

Record Findings

- Further clarification is required for all NC codes except 1 and 6.
- Example:
 - NC code 3: Store label states USA; however, PLU sticker states Peru.
 - NC code 4b: Packaged stated grown in Big Valley Farm.
 - NC code 4c: Fresh meat display sign stated “Product of USA.” No production step.



Part B: Conduct Review

Initial Review

Entering Non-Compliances in Checklist

- Enter all non-compliance information into the Workbook on the Checklist tab in the appropriate commodity sections.
- Be sure to be descriptive as you are our “eyes and ears”.



Part B: Conduct Review

Initial Review

Entering Non-Compliances in Checklist

- Capitalize 1st letter of item's name.
- Select correct NC code(s).
- Provide notes describing the NC(s).

Number of Items Reviewed		50	Vegetables			Not sold in store	
Non-Complying Item(s)		NC Codes			Notes		
1	Jalapeno Peppers	3			Store sign states Mexico; however, PLU sticker states USA.		
2							
3							
4							
5							
6							
7							



Part B: Conduct Review

Initial Review

Entering Non-Compliances in Checklist

- Use proper spelling, grammar, and punctuation.
- Include as much information as possible (brand name, pack size, etc.) so the retailer knows which items to address.



Part B: Conduct Review

Initial Review

Entering Non-Compliances in Checklist

- If you need additional space use the Additional Item page.

Additional Items					
	Non-Complying Item(s)	NC Codes			Notes
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					



Part B – Numerous Items

- There are instances when so many items are found to be non-compliant, it is not necessary to list each one.
- Record in appropriate commodity section.
- Group items with different NC codes separately.

Number of Items Reviewed		100	Fruits			Not sold in store
Non-Complying Item(s)		NC Codes		Notes		
1	12 Fresh Fruit sold in bulk	1				
2	14 Fresh Fruit sold in bulk	5			Various countries of origin were abbreviated.	
3						
4						
5						



Part B: Conduct Review

Initial Review

Interview Questions

- Interview questions are located toward the end of page 3 of the initial review workbook.



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

Number of Items Reviewed		Lamb & Goat		Not sold in store
Non-Complying Item(s)		NC Codes		Notes
1				
2				
3				
4				
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 you staff and consumers?

Page 3 of 4



Part B: Conduct Review

Initial Review

Interview Questions

- Interview questions assess retailer's recordkeeping compliance.
- Interview questions must be completed at the time the initial review is conducted.
- Reviewer can provide interview questions during opening or closing meeting.



Step 2:

Part B: Conduct **Follow-up** Review



Part B: Conduct Review

Follow-up Review

- COOL Reviewers will document non-complying items and their NC code(s) in the appropriate follow-up review workbook.
- Follow-up reviews contain 6 labeling non-compliance commodity categories 6 recordkeeping sections.



Part B: Conduct Review

Follow-up Review

Review all 6 covered commodity categories:

- Produce Department (fresh and frozen fruits and vegetables; ginseng)
- Baking Aisle (nuts: raw peanuts, pecans, macadamia nuts)
- Meat Department (fresh and frozen lamb, goat, chicken)
- Seafood Department (fresh and frozen fish and shellfish)



Part B: Conduct Review

Follow-up Review

Including all locations:

- Full-service counters
- Frozen items display cases
- Self-service areas, sale counters and promotional displays





Part B: Conduct Review

Follow-up Review

Record Findings

The more information the better!

- Bartlett Pears, sold in bulk
- Navel Oranges, 5 lb bags
- Frozen Dole Mango Chunks, 1.5 lb best by 8/2010
- Previously Frozen Whole Catfish in Fresh Cooler



Part B: Conduct Review

Follow-up Review

Record Findings

- Describe the item in the non-complying items(s) column of the workbook.
- Record the applicable NC code(s).
- **Reminder**: There may be more than one NC code per item.



Part B: Conduct Review

Follow-up Review

Record Findings

- Further clarification is required for all NC codes except 1 and 6.

Example:

- NC code 13: Invoice record does not identify the supplier name, city and state.
- NC code 14: Store sign states USA; however, invoice record states Mexico.
- NC code 15: Store sign states Wild Caught; however, delivery slip and master container state Farm-Raised.



Part B: Conduct Review

Follow-up Review

Pictures of all non-compliances and recordkeeping items observed in store are required for follow-up reviews ONLY.

*Do not submit pictures of records (e.g., invoice, BOL, etc.)





Part B: Conduct Review

Follow-up Review

- Pictures will be submitted with workbook once Follow-up Review is completed.





Part B: Conduct Review

Follow-up Review

- Make every effort to provide pictures that are clear and legible.
- If necessary, take multiple pictures to properly record the non-compliance.



Part B: Conduct Review

Follow-up Review

Example: Three pictures were provided for the pineapple. The store sign states USA as the country of origin; however, the back of the tag states Panama and the front of the tag states Honduras.





Part B: Conduct Review

Follow-up Review

Entering Non-Compliances in Checklist

- If no commodities were present in a given section, apply an X in the “Not sold in store” field.

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



Part B: Conduct Review

Follow-up Review

Enter Number of Items Reviewed. This is the total number of commodities reviewed for the section.

Example: Retail store sold Gala apples, Fiji apples, Granny Smith apples, and Red Delicious apples in the fruit section. A total of 4 items reviewed will be recorded in the fruits section.

Number of Items Reviewed		Fruits			Not sold in store
Non-Complying Item(s)		NC Codes		Notes	
1	Gala Apples	1			
2					
3					
4					



Part B: Conduct Review

Follow-up Review

Entering Non-Compliances in Checklist

- Enter all non-compliance information into the Workbook on the Checklist tab in the appropriate commodity sections.
- Be sure to be descriptive as you are our “eyes and ears”.



Part B: Conduct Review

Follow-up Review

Entering Non-Compliances in Checklist

- Capitalize 1st letter of item's name.
- Select correct NC code(s).
- Provide notes describing the NC(s).

Number of Items Reviewed		50	Vegetables			Not sold in store	
Non-Complying Item(s)		NC Codes			Notes		
1	Jalapeno Peppers	3			Store sign states Mexico; however, PLU sticker states USA.		
2							
3							
4							
5							
6							
7							



Part B: Conduct Review

Follow-up Review

Entering Non-Compliances in Checklist

- Use proper spelling, grammar, and punctuation.
- Include as much information as possible (brand name, pack size, etc.) so the retailer knows which items to address.



Part B: Conduct Review

Follow-up Review

Entering Non-Compliances in Checklist

- If you need additional space use the Additional Item page.

Additional Items				
	Non-Complying Item(s)	NC Codes		Notes
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				



Part B – Numerous Items

- There are instances when so many items are found to be non-compliant, it is not necessary to list each one.
- Record in appropriate commodity section.
- Group items with different NC codes separately.

Number of Items Reviewed		100	Fruits			Not sold in store
Non-Complying Item(s)		NC Codes		Notes		
1	12 Fresh Fruit sold in bulk	1				
2	14 Fresh Fruit sold in bulk	5			Various countries of origin were abbreviated.	
3						
4						
5						



Part B: Conduct Review

Follow-up Review

- Record any recordkeeping non-compliances as described in the Recordkeeping Procedures training course.

Number of Items Reviewed		Chicken			Not sold in store
Non-Complying Item(s)		NC Codes			Notes
1	Whole Broiler Chicken	13			Invoice record did not include the supplier name, city, and state.
2					
3					
4					
5					
6					
7					



Step 2:

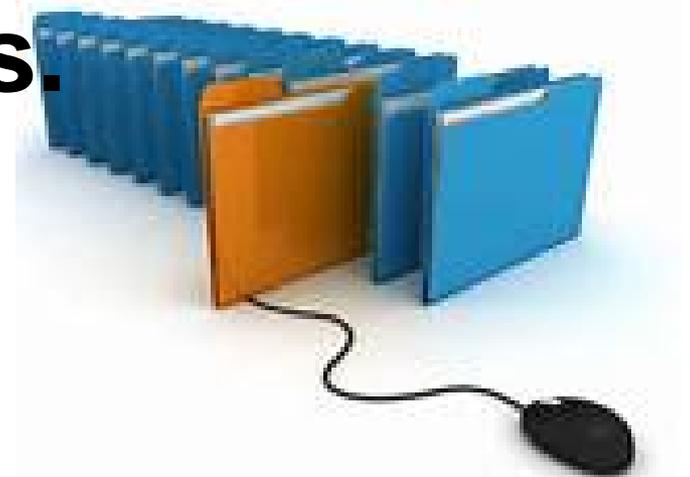
**Part C: Recordkeeping (Applies to
Follow-up reviews only)**



Part C: Conduct Review

Follow-up Review

**For fiscal year 2016
recordkeeping information will
be collected for all 6 commodity
categories.**





Part C: Conduct Review

Follow-up Review

Records will be requested during the retail review.





Part C: Conduct Review

Follow-up Review

The Recordkeeping Procedures section of training will describe the methods used to collect records and how to record non-compliances.



**How should a Reviewer handle
non-compliances corrected
during the retail review?**





Non-compliances Corrected During the Review

- All non-compliances observed by the Reviewer **must** be reported to USDA even if they are corrected right away.
- Reviewer may include a note in the “Additional Comments and Information”

Example: “All fruit items with NC code 1 findings were corrected prior to leaving store.”



Step 2: Part D: Closing Meeting





Part D – Closing Meeting

- Provide Responsible Authority a copy of the completed Checklist;
- Discuss the results of the review and any findings identified;
- Verify name of Responsible Authority, email address, mailing address and phone number;



Part D – Closing Meeting

- Inform the Responsible Authority
Findings are not official until reviewed by USDA;
- If store received 4 or more noncompliance codes they will receive official notification from USDA requiring a response with corrective actions and preventative measures



Part D – Closing Meeting

Provide the Responsible Authority:

- Your contact information in case they have questions, and
- If a Follow-up Review was conducted, provide Records Request Form in case any records were pending to be submitted.



Records Request Form

Records Request Form will include:

- Item name for which records are being requested.
- Description of records required.
- Reviewer Contact information (Name, fax #, and e-mail).

 **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., Home Brand, Ready to Eat Green Beans, 1lb star, Prod. Of Mexico, Dist. by 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: _____

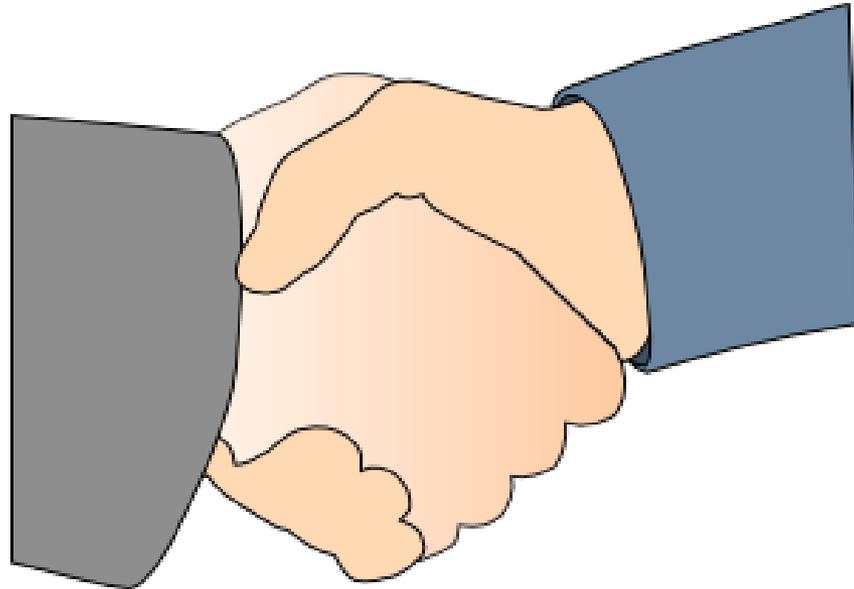
Thank You!



Step 2 - Complete



- Thank the Responsible Authority for their time and attention.





Step 3:

Submit Workbook and Pictures (when applicable) to USDA COOL Division. Pictures are only required for follow-up reviews.



Step 3 – Post Review

- Enter all non-compliances into the workbook checklist as well as the recordkeeping information.
- Enter Yes or No in the “Findings Identified?” field.
- Click “Spell Check” and make any necessary corrections.



Step 3 – Comments Section

- The comment section will not print. It will only be viewed in excel file.
- Area to explain an issue or note pertinent information that COOL Specialists may need.
- Note if a whole group of covered commodities are not available.



Step 3– Comments Section

Follow-up Review

- If conducting a follow-up review, record whether or not previous findings were corrected.
- Make notation if store information has changed.

Questions? Contact the COOL Division at (202) 720-4486

Comments:

The store ownership has changed since the last review (change effective 7/15/14). The previous store's name was Hometown IGA; however, the current store's name is Joe's Produce. This store sells only fruits and vegetables; therefore, only two items were chosen for records review. The non-complying items were corrected during the review. The bulk items cited on the 2014 review were again found to be non-compliant, but the store-packaged items were properly labeled this time.



Step 3: Saving Pictures

Follow-up Review

- Pictures **must** be combined and saved in PDF or Word format.
- The picture file must be saved with the appropriate file name.

Example: NY 15 F3941A Pictures



Step 3: Saving Pictures

Follow-up Review

- Do not include more than 4 pictures per page.
- Pictures must be organized in the order they are listed in the workbook.





USDA Recommendation

Once Workbook and Pictures are complete, State Managers are encouraged to evaluate workbooks prior to submitting to USDA



Step 3 – Submit Workbook and Pictures

Important: 2016 Follow-up
Reviews and pictures will be
submitted using Cloud Vault.



Step 3: Cloud Vault

- State Managers will receive two (2) emails directly from the COOL Division.
- Both emails will contain a hyperlink to access 2 separate folders in Cloud Vault.



Step 3: First Cloud Vault Email

- First email will include a hyperlink that contains **previous year's reviews**.

Email #1 subject is “**2015 Reviews - New York**”.
Your state name will appear instead of NY.



Step 3: Second Cloud Vault Email

- Second email will include a hyperlink to **upload 2016 Follow-up Reviews**.

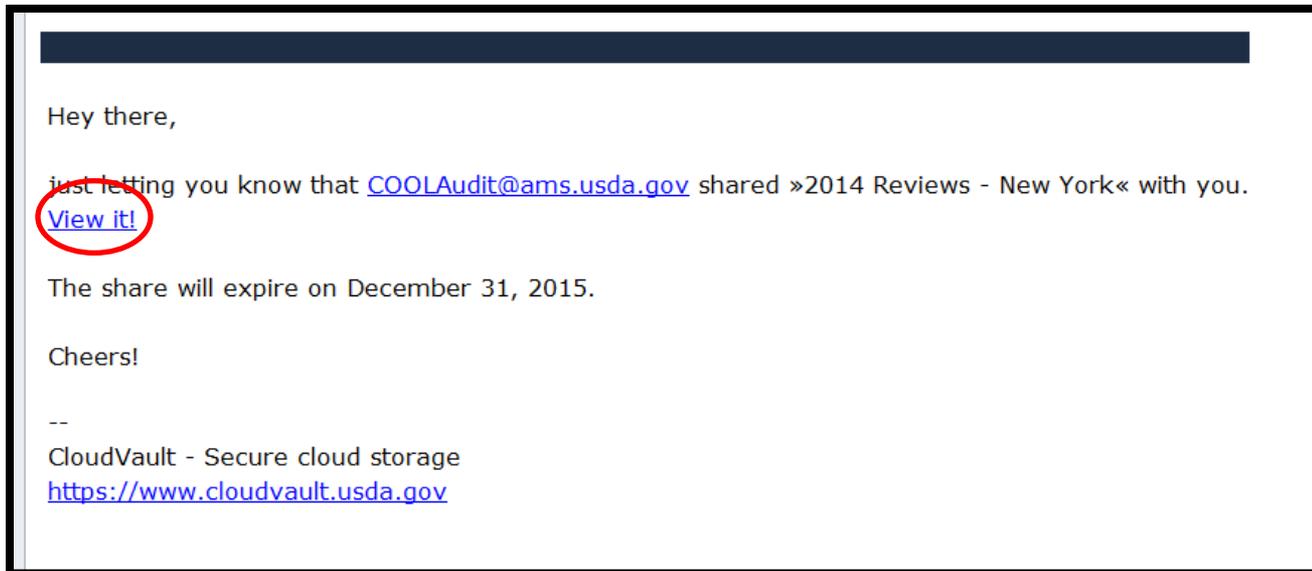
Email #2 subject is “**2016 NE Region - Submit Reviews HERE**”.

Your Region will appear instead of NE.



Step 3: Access Cloud Vault

- To access folder:
 - Click on the “View it!” hyperlink, **or**
 - Right click > Copy Hyperlink > Paste in IE, Google Chrome, Safari, or Firefox.





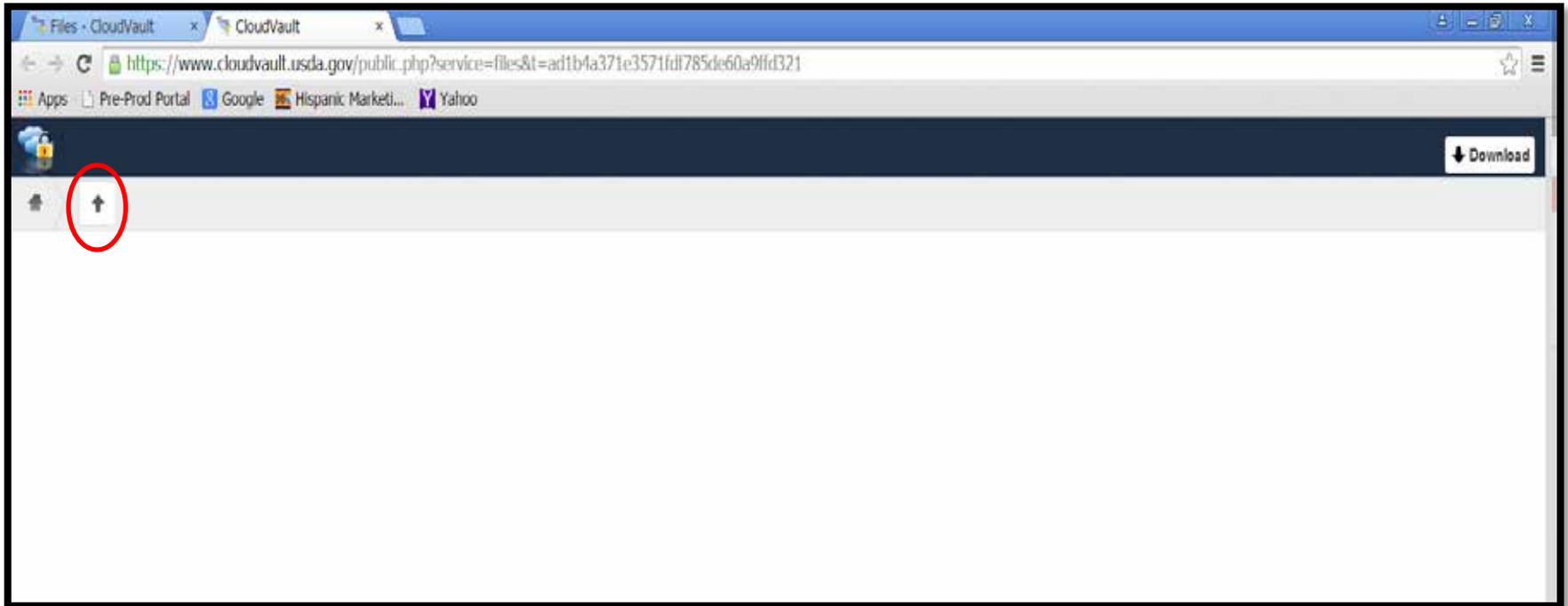
Step 3: Access Cloud Vault

Caution: When using Cloud Vault you may have limited access using Internet Explorer (IE); however, you can use Google Chrome, Safari, or Firefox.



Step 3: Begin Upload

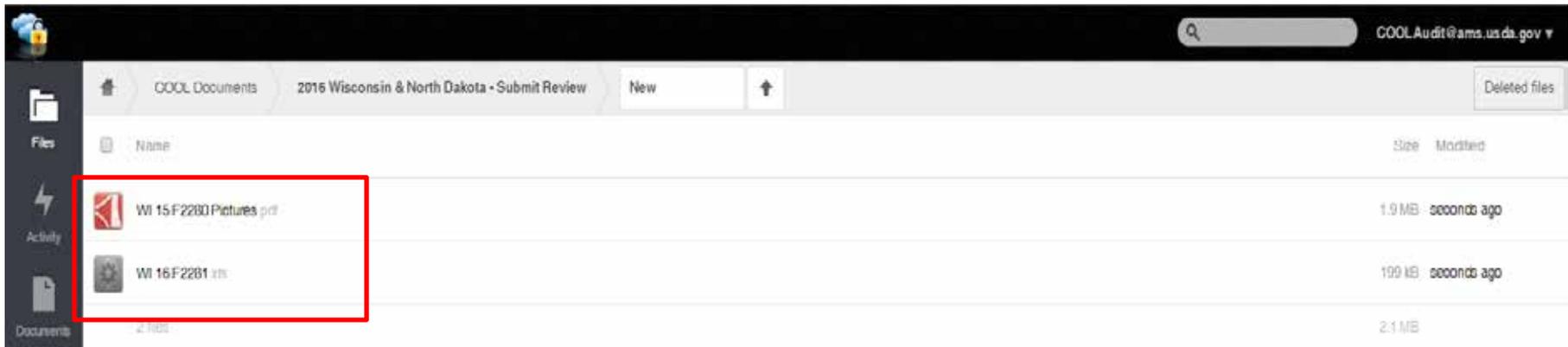
1. Click on arrow (↑)





Step 3: Begin Upload

2. Select workbook and picture file from your computer. Note: You can also drag and drop!
3. Workbook will appear on Cloud Vault. You can open files by clicking on the file name.





Step 3 - Complete





Recap: 3-Step Procedure





Initial Retail Review

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
- Closing Meeting

Submit Review

- Complete workbook by entering any findings identified and answers to the 5 Interview Questions .
- Submit Workbook to USDA



Follow-up Retail Review

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 within the 5 business days.
- Organize and consolidate pictures in one file
- Submit Workbook to USDA



What is Wrong?

	Agricultural Marketing Service	Country of Origin Labeling Division	1400 Independence Avenue, SW. Room 2620-S, STOP 0216 Washington, DC 20250-0216	Spell Check	Checklist
March 9, 2016					
Country of Origin Labeling (COOL) Retail Surveillance Follow up Review Checklist					
Review Number	DC 16 F234	Reviewer's Name	FRANK		
Date Reviewed	4/11/2016	Reviewer's Email	FRANK@SMITH2.com		
Store Name	BOBS MARKET	Reviewer's Phone Number	(202) 567-0987		
Store ID Number		Store Representative	DAVID JONES		
Physical Address	1 MAIN STREET	Responsible Authority's Name	BOB JONES		
City, State ZIP	WASHINGTON, D.C. 20005	Responsible Authority's Position	MANAGER		
Store Phone Number	(202) 332-4030	Responsible Authority's Email	bobjones9@Bmarket.com		
Corporate Contact Email		Findings Identified?			
<p><i>This review is conducted in accordance with the requirements contained in the Mandatory Country of Origin Labeling Final Rule Title 7 CFR Part 60 and 65, as amended through March 2, 2016.</i></p> <p><i>The results of this review are not official until reviewed by the COOL Division Director.</i></p>					



What is Wrong?

 Agricultural Marketing Service		Country of Origin Labeling Division	1400 Independence Avenue, SW. Room 2620-S, STOP 0216 Washington, DC 20250-0216	Spell Check	Checklist March 9, 2016
Country of Origin Labeling (COOL) Retail Surveillance Follow up Review Checklist					
Review Number	DC16N2525B	Reviewer's Name			
Date Reviewed	4/15/2016	Reviewer's Email			
Store Name		Reviewer's Phone Number			
Store ID Number	Murry's	Store Representative	William O'Henney		
Physical Address	769 H Street NE	Responsible Authority's Name	Mr.	William	
City, State ZIP	Washington, D.C. 20004	Responsible Authority's Position	General Manager		
Store Phone Number		Responsible Authority's Email			
Corporate Contact Email		Findings Identified?	No		
<p><i>This review is conducted in accordance with the requirements contained in the Mandatory Country of Origin Labeling Final Rule Title 7 CFR Part 60 and 65, as amended through March 2, 2016.</i></p> <p><i>The results of this review are not official until reviewed by the COOL Division Director.</i></p>					



What is Wrong?

	Agricultural Marketing Service	Country of Origin Labeling Division	1400 Independence Avenue, SW, Room 2620-S, STOP 0216 Washington, DC 20250-0216	Spell Check	Checklist
	March 9, 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?	Store Closed		
<p><i>This review is conducted in accordance with the requirements contained in the Mandatory Country of Origin Labeling Final Rule Title 7 CFR Part 60 and 65, as amended through March 2, 2016.</i></p> <p><i>The results of this review are not official until reviewed by the COOL Division Director.</i></p>					



What is Wrong?

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



What is Wrong?

Number of Items Reviewed		33			Chicken			Not sold in store	
Non-Complying Item(s)				NC Codes			Notes		
1	Chicken 8oz. Breast			4c					
2									
3									
4									
5									
6									
7									



What is Wrong?

Number of Items Reviewed		18		Fish & Shellfish		Not sold in store	
Non-Complying Item(s)		NC Codes		Notes			
1	Fresh Salmon Fillet	1	6	Production Steps not stated on item.			
2							
3							
4							
5							
6							
7							



What is Wrong?

Number of Items Reviewed		9		Lamb & Goat		Not sold in store	
Non-Complying Item(s)			NC Codes		Notes		
1	Lamb Roast		4c		Method of Production not stated.		
2							
3							
4							
5							
6							
7							



Questions?

