

**USDA** Country of Origin Labeling



**Initial and Follow-up Workbook**

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**USDA** 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.

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**USDA** 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
    - ✓ 6 commodity categories
    - ✓ 5 interview questions
  2. Follow-up Retail Surveillance Review Workbook
    - ✓ 6 commodity categories
    - ✓ 6 recordkeeping sections

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**USDA** Initial Review Workbook

Page 3:

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



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**USDA** Initial Review Workbook

Page 4:

- Additional Items section



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**USDA** Follow-up Review Workbook

Page 1:

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



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**USDA** **Follow-up Review Workbook**

Page 2:

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



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**USDA** **Follow-up Review Workbook**

Page 3:

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



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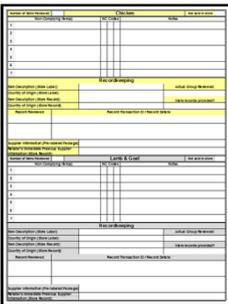
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**USDA** **Follow-up Review Workbook**

Page 4:

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



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## Initial Retail Review NC Codes

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

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## Follow-up Retail NC Codes

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

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## Labeling NC Codes 1-9

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

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## 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.

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## Let's Review All NC Codes




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## 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.

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**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.

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

**Example:**



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

**Example:**



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

Example:

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**USDA** NC Code 1 – Grade Standards

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

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**USDA** 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.

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### NC Code 1 – Supplier’s Address

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



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### 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.

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### NC Code 2 - Inconspicuous

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



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**USDA** **NC Code 2 - Inconspicuous**

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



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**USDA** **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.



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**USDA** **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.



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**USDA** **NC Code 2 – Additional Examples**

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

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**USDA** **NC Code 2 – Smearred**

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

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**USDA** **NC Code 2 – Additional Examples**

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

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### NC Code 3 – Not Accurate

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.

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### NC Code 3 – Inaccurate

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

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### NC Code 3 – Inaccurate

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



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**USDA** NC Code 3 – Inaccurate

Example:

USA	Leeks
Mexico	Lemons
USA	Lettuce

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**USDA** NC Code 3 – Inaccurate

Example:

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**USDA** 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.

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**USDA** **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**



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**USDA** **NC Code 4b – Indistinct Locality**

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



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**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



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### NC Code 4c – Production Steps

- 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.



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### 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.



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### NC Code 5 – Spelling and Abbreviations

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

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

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**USDA**

### 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"




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**USDA**

### 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)

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**USDA**

### NC Code 6 – Missing 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.

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**USDA** **Acceptable Method of Production**

**Reminder:**

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

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**USDA** **NC Code 6 – Missing MOP**

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

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**USDA** **NC Code 6 – Missing MOP**

**Example:**

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




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### 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.

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### 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.




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### 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.

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**USDA NC Code 8 – Inaccurate MOP**

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



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**USDA NC Code 8 – Inaccurate MOP**

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



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**USDA NC Code 9 – MOP Not in Acceptable Form**

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

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

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### NC Code 9 – MOP Not Acceptable

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



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### Multiple NC Codes

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

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### Multiple NC Codes

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



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**USDA** **Multiple NC Codes**

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

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**USDA** **Multiple NC Codes**

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

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**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.

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**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 **records only** provided the retailer can accurately decipher it.

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

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**USDA** NC Code 12 – No MOP on Records

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

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

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**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)

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### 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.

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### 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
15	Records information for method of production as provided by supplier is <b>not</b> accurately conveyed to point of sale label.

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### 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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**USDA** Is this a Pre-labeled Item?



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**USDA** Is this a Pre-labeled Item?



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**USDA** Questions?



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