

USDA Country of Origin Labeling



Recordkeeping Procedures

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USDA Overview

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

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USDA Retailer's Recordkeeping Requirements



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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).

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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.

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Follow-up Retail Review Workbook



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 **Retail Review Workbook**

- There are 2 types of Retail Surveillance Reviews.
 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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 **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.

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 **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.

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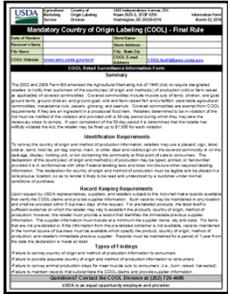
USDA **Follow-up Retail Review**

- **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.

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USDA **Follow-up Review Workbook**

Information Form Tab



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USDA **Follow-up Review Workbook**

Checklist Tab

Page 1:

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



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Pre-Labeled or Not



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What is a pre-labeled covered commodity?



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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.

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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

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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.

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Is this a Pre-labeled item?



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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 Is this a Pre-labeled item?

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USDA **Conducting Follow-up Review**



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USDA **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.

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USDA **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.

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Requesting Records



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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

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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

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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.

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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).

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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:

- ✓ Invoice with the Retailer's Supplier Name, City, and State.
- ✓ Shipping Manifest with the country of origin and method of production.

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



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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

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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

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



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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 Stores Reviewed	Not Sold in Store	Not Sold in Store	Not Sold in Store
1			X
2			
3			
4			
5			
6			
7			

Recordkeeping	
Item Description (Store Label)	Actual Group Reviewed
Country of Origin (Store Label)	Where records provided?
Item Description (Store Record)	
Country of Origin (Store Record)	
Records Reviewed	Record Transaction ID/ Record Details

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



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USDA What records would be required?

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USDA What records would be required?

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USDA What records would be required?

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Recording Unique Identifiers

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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		Actual Group Reviewed:
Item Description (Store Label):		
Country of Origin (Store Label):		
Item Description (Store Record):		Were records provided?
Country of Origin (Store Record):		YES
Record Reviewed	Record Transaction ID / Record Details	

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Actual Group Reviewed

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

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

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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	

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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):		

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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

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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.

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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) 555-6966	

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

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USDA 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

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USDA 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

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USDA **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, 40b 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	

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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 Package)		
Retailer's Immediate Previous Supplier Information (Store Record):	Seamore Foods 2828 Spangler Rd, Dallas, TX, 75220 (214)	

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How could the Recordkeeping be improved?

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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):	W.G. Smith Produce, Inc. P.O. Box 33975	

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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 Package)		
Retailer's Immediate Previous Supplier Information (Store Record):	Pizzano's, Inc 2828 Schoolhouse Blvd, Seagort, CT 06410	

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Questions?



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