

# Module 7

## Recordkeeping for the Review

### COOL Retail Reviewer Training Course



# Lesson Objectives

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**At the end of the lesson, you will be able to:**

- Know what is a record.
- Understand how long and where a retailer must keep records.
- Understand what information to gather from records.
- Understand how retailers can comply if records are not kept on-site.
- Understand when to obtain pictures.



# Requesting Records

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- The purpose of the record's request is to evaluate if the retailer is meeting its country of origin labeling (COOL) recordkeeping requirements.
- The reviewer will verify the accuracy of the COOL information at the point of sale as compared to the records provided.
- When requesting records, the reviewer verifies: a) COOL information is accurately conveyed from supplier to retailer, and b) retailer is retaining records for 1-year.



# Recordkeeping Requirements

- Suppliers and retailers shall make available to USDA representatives records maintained in the normal course of business that **verify an origin claim.**
  - Such records shall be provided **within 5 business days** of the request and may be maintained in any location.
  - All records must be legible and may be maintained in either electronic or hard copy formats.
  - Various forms of documentation and records are acceptable.
- 7 CFR §65.500 (a) Recordkeeping requirements



# Recordkeeping Requirements

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## Maintaining records:

- Records and other documentary evidence relied upon at the point of sale to establish a covered commodity's country(ies) of origin must either be maintained at the retail facility or at another location for as long as the product is on hand.
- For pre-labeled products, the label itself is sufficient information on which the retailer may rely to establish the product's origin and no additional records documenting origin information are necessary.



# Recordkeeping Requirements

- **Pre-labeled** means a covered commodity that has the commodity's country of origin, and, as applicable, method of production information, and the name and place of business of the manufacturer, packer, or distributor on the covered commodity itself, on the package in which it is sold to the consumer, or on the master shipping container. The place of business information must include at a minimum the city and state or other acceptable locale designation.

7 CFR § 60.118 Pre-labeled



# Recordkeeping Requirements

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## Maintaining records

- Records that identify the covered commodity, the retail supplier, and for products that are not pre-labeled, the country of origin information must be maintained for a period of 1 year from the date the origin declaration is made at retail.

7 CFR §65.500 (c) Responsibilities of Retailers



# Why are Records Important?

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- Records verify that the Country of Origin (COO) / Method of Production (MOP) provided at the point of sale is conveyed accurately from the retailer's immediate previous supplier to the consumer.
- Records verify the retailer is maintaining records for up to 1 year.
- Records initiate supplier traceback audits that identify the commodity's chain of custody and origin information. Reviewers should request records from items that are correctly labeled with the country of origin/method of production.



# Reminders for Records

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- **Note:** Always try to collect records for covered commodities that are correctly labeled at the point of sale. If the product is mislabeled to begin with, it is difficult to verify the correct corresponding record.
- During the course of the retail review assignment year, reviewers should try to select as many different suppliers and individual commodity items within the assigned categories for each store as possible.
- Select among fresh and frozen products as well as pre-labeled products and store labeled products.



# 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.



# Records Not Maintained in Store

- If the records are not maintained at the facility, inform the store representative that they have 5 business days to provide the records.
- Provide the store representative with a Records Request Form. The form includes the due date when records must be received and the e-mail address or fax number where records should be submitted.

 **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:
<b>Item Name &amp; Description</b> <small>(e.g., Home Brand, Ready to Eat Green Beans, 1lb size, 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 **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 Not Maintained in Store

- Advise the store representative that if records are not received within 5 business days, they will be cited with a non-compliance (NC) finding for failure to provide records (NC 10 for non-pre-labeled items).
- If no additional records are provided within 5 business days to substantiate the chain of custody for a pre-labeled item, then NC code 16 applies.

<u>Code</u>	<u>Non-Compliance Findings</u>
<b>10</b>	Records were <b>not</b> provided within 5 business days.
<u>Code</u>	<u>Non-Compliance Findings</u>
<b>16</b>	Records that identify the chain of custody for the pre-labeled item were <b>not</b> provided within 5 business days.



# Workbook Recordkeeping Section

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):		



# Documenting Recordkeeping Information

Once records are obtained, complete the records section for the corresponding commodity category.

- **Actual Group Reviewed** section: select from the drop down menu the recordkeeping item for which records were provided.
- **Were Records Provided?** Select **yes** if records were provided within 5 business days. Select **no** if records were not provided.

**\*Important:** Enter recordkeeping information in the correct commodity category (e.g., enter records for apples in the fruit section of the workbook).

**Do not** enter recordkeeping information for apples in the chicken commodity category, which is designated with the color yellow in the review workbook.



# Documenting Recordkeeping Information

- Item Description (Store Label) section:** Document the COOL information provided to the customer by the store label, including brand name.
- Country of Origin (Store Label) section:** Document the country of origin information provided to the customer at the retail store. If the retailer relies on the origin printed on a pre-labeled item, enter the country of origin information in this section.

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):		



# Documenting Recordkeeping Information

- **Item Description (Store Record) section:** Document the item name and description provided on the record.
- **Country of Origin (Store Record) section:** Document the country of origin provided on the record.

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):		



# Documenting Recordkeeping Information

- **Records Reviewed section:** Select from the drop down menu type of record(s) reviewed (e.g., bill of lading, invoice, shipping manifest, master container label, package label, etc.).
- **Record Transaction ID/Record Details section:** Document any identifying information from the item label or records including:
  - Invoice, bill of lading, or purchase order number;
  - Best by, sell by or invoice date from the reviewed document or container;
  - Product's unique identifier, best-by date, or lot number; and,
  - Specific product name, package size, brand name.



# Documenting Recordkeeping Information

- **Pre-labeled Package Supplier Information section:** For pre-labeled items, document the supplier information printed on the package or box. This information may be obtained from a consumer ready package or master container. This would identify the distributor, packer, importer, and manufacturer of the pre-labeled item.





# Documenting Recordkeeping Information

- **Retailer's Immediate Previous Supplier Information (Store Record) section:** Document the retailer's immediate previous supplier address (city and state), fax, web site, and phone number. This information is obtained from the record provided by the retailer and is the supplier who directly shipped to the retail store location, usually a distribution center.

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Store Log				
Date	Item	Item Country of Origin	Lot #	lbs Produced
5/1/12	Crunch Inv# 934 Date: 5/1/12	USA	CRISILL # 1567892	Combined 93/7 lb 50 lbs
	Peel Off Crinkles Invoice# 657 Date: 5/4/12	USA/CAN/Mex	CRISILL # 245678	



# Pre-Labeled Items

- A pre-labeled item is a record. It contains the country of origin declaration (method of production if applicable), name, city and state of the manufacturer, and packer or distributor.
- The record (product, consumer-ready package, master container) is maintained by the retailer as long as the product is on hand.





# Pre-Labeled Items

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- Once the product is sold, the pre-labeled record is no longer available.
- A second record (invoice, purchase order, bill of lading, etc.) is requested to verify the retailer is retaining records of the transaction for one year.
- That second record does not need to have the COO / MOP information because the pre-labeled record already has the COO / MOP evidence.



# Pre-Labeled Items

## Pre-Labeled Item

- Request one additional record to confirm the transaction between the immediate previous supplier and the retailer for the item selected. Neither the country of origin nor method of production information is required on this additional record because this information is on the pre-labeled record.
- Document any transaction ID (e.g., package weight or size, best by date, production code, lot number, including COO / MOP; invoice number, purchase order date) on the pre-labeled package or master container information, and on the additional record provided.



# Photographs

- During follow-up retail surveillance reviews only, take pictures of each finding of non-compliance.
- The first picture must include the store's banner name and the entrance of the store. A picture of the store front is required even if the retailer has no findings.





# Photographs

- During **follow-up retail surveillance reviews only**, take pictures of each finding of non-compliance.
- Take pictures of each recordkeeping item selected and a picture of the record.
- If an entire department has numerous NC codes, take a picture of the group of commodities and gather a total count. Submit the finding as one citation (for example, 20 chicken whole muscle cuts were missing production steps).



Thank you for completing  
Module 7!