

Module 4

Module 4-Conducting Covered Commodity Review (STEP 3)

COOL Retail Reviewer Training Course



Review of Covered Commodities

- After the opening meeting, Reviewer must:
 - Visually inspect all 6 categories of covered commodities: fresh and frozen fruits and vegetables, fish and shellfish, chicken, lamb, goat, peanuts, pecans, macadamia nuts, and ginseng.
 - Record all noncomplying items and their NC codes in the corresponding commodity category.
- **Remember**: All sections of the retail store must be reviewed for covered commodities, including: produce department, baking aisle, meat department, seafood department, full-service counters, sale counters, and promotional displays.



Counting Commodities Reviewed

- When reviewing each of the 6 categories located in the retail review workbook, reviewer must document the total number of items reviewed. The total is recorded in the top left corner of the commodity category section.

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



Counting Commodities Reviewed Example

- Reviewer observes the following varieties of apples:



Gala



Fuji



Granny Smith



Red Delicious

- How many covered commodities have you reviewed?



Counting Commodities Reviewed Example (cont.)

- Answer: A total of 4 items reviewed will be recorded in the “Number of Items Reviewed” field of the Fruits commodity category.

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



Gala



Fuji



Granny Smith



Red Delicious

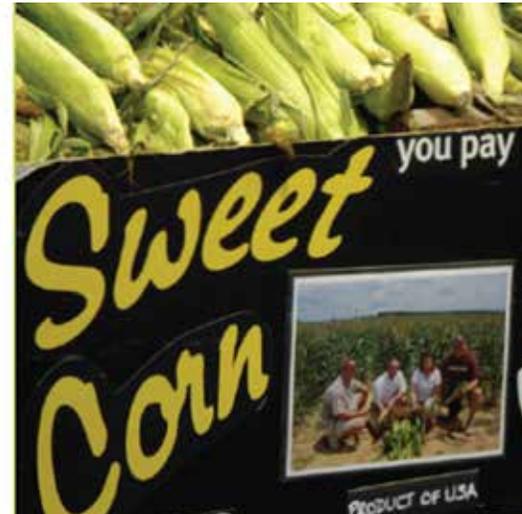


Commodity Category Not Sold In Store

- If no commodities within the commodity category are sold in store, apply an X in the “Not sold in store” field.

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

Non-Compliance (NC) Codes





Non-Compliance (NC) Codes

- Non-Compliance (NC) Codes help identify and record the type of findings observed at the retail store location.
- There are 16 NC codes; however, depending on the type of retail review (initial or follow-up) being conducted, only part of the codes may apply.



Non-Compliance (NC) Codes Initial Retail Surveillance Review

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

USDA Agricultural Marketing Service		Food Disclosure and Labeling Division		140 Independence Avenue, SW, Room 2614-S, STOP 6216 Washington, DC 20250-6216		Checklist
Country of Origin Labeling (COOL) Initial Retail Surveillance Review						
Review Number	DC 17 N2345A	Reviewer's Name	Frank Smith			
Date Reviewed	4/11/2017	Reviewer's Email	frank.smith@aphis.usda.gov			
Store Name	Bob's Supermarket	Reviewer's Phone Number	(202) 557-0907			
Store ID Number	1234	Store Representative	David Jones			
Physical Address	123 Main Street	Responsible Authority's Name	Mr. Bob	Jones		
City, State ZIP	Washington, D.C. 20006	Responsible Authority's Position	Store Manager			
Store Phone Number	(202) 324-4000	Responsible Authority's Email	cdjones@bobssupermarket.com			
Corporate Contact Email	apob@bobssupermarket.com	Findings Identical?	<input checked="" type="checkbox"/> Yes			
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). The results of this review are not official until reviewed by the COOL Division Director.						
Non-Compliance (NC) Codes						
Code	Non-Compliance Findings					
1	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 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	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.					
8	The method of production declaration is not accurate at point of sale.					
9	The method of production is not stated in an acceptable form. (i.e., wild, wild caught, farmed, farm-raised, etc.)					
Questions? Call (202) 799-6488						



Non-Compliance (NC) Codes

Follow-up Retail Surveillance Review

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

USDA Agricultural Marketing Service		Food Disclosure and Labeling Division		100 Independence Avenue, SW Room 2614-S, STOP 6216 Washington, DC 20250-6216		Checklist
Country of Origin Labeling (COOL) Follow-up Retail Surveillance Review						
Review Number	WI 17 F79208	Reviewer's Name	John Smith			
Date Reviewed	4/11/2017	Reviewer's Email	john.smith@aphis.usda.gov			
Store Name	Gordys ABC Market	Reviewer's phone number	(715) 000-0000			
Store ID Number	123	Store Representative	Michael Clark			
Physical Address	987 Downtown Street	Responsible authority's name	Ms. Renee	Clark		
City, State ZIP	Eagle River, Wisconsin 54521	Responsible Authority's Position	Store Owner			
Store Phone Number	(715) 000-0001	Responsible Authority's Email	renee.clark@abc.com			
Corporate Contact Email	Gordys.ABC@abc.com	Findings Identified?	Yes			
<small>This review is conducted in accordance with the requirements contained in the Mandatory Country of Origin Labeling Final Rule CFR Part 80 and 85, as amended through March 2, 2016. The results of this review are not official until reviewed by the COOL Division Director.</small>						
Non-Compliance (NC) Codes						
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.			
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 caught, farmed, fermented, etc.)			
3	The country of origin declaration is not accurate at point of sale.	10	Records 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.	11	Records do not provide the country of origin information.			
4b	The country of origin is not stated in an acceptable form. The origin designation on the term, "organic grown" does not provide sufficient origin declaration.	12	Records do not provide the method of production information.			
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.	13	Records do not provide the Supplier information. Supplier records are required for all Threshold items.			
5	Abbreviations and variant spellings do not unambiguously indicate the country of origin.	14	Records information for country of origin as provided by supplier is not accurately conveyed to point of sale label.			
6	Covered commodity is not identified with the method of production.	15	Records information for method of production as provided by supplier is not accurately conveyed to point of sale label.			
7	The method of production declaration is not legible and/or is not placed in a conspicuous location.	16	Records that identify the chain of custody for the pre-labeled item were not provided within 5 business days.			
<small>Questions? Call (202) 725-4466</small>						



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.

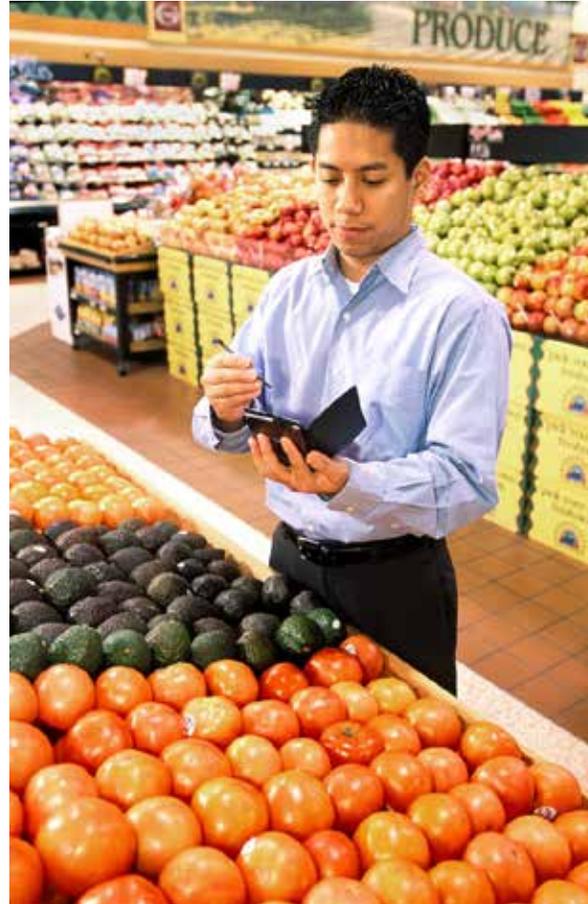


Recordkeeping NC Codes 10-16

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.



Let's Review All NC Codes





NC Code 1 – No Country of Origin

NC code 1 is applied when the retailer did not convey country of origin information to consumers in any manner. The country of origin is not identified on the individual package, PLU, stickers, store sign, store label, rubber band, etc.

<u>Code</u>	<u>Non-Compliance Findings</u>
1	Covered commodity is not identified with the country of origin.



NC Code 1 – No Country of Origin Example





NC Code 1 – No Country of Origin Example (cont.)





NC Code 1 – No Country of Origin Example (cont.)





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 various US Government agencies to ensure they are safe, wholesome, and properly labeled.





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.





NC Code 2 – Not Legible and/or Conspicuous

NC code 2 applies when country of origin is present; however, information is covered, smeared, obscured, or less than 50% of the items sold in bulk have a country of origin sticker.

<u>Code</u>	<u>Non-Compliance Findings</u>
2	The country of origin declaration is not legible and/or is not placed in a conspicuous location.



NC Code 2 – Inconspicuous Example

- Below the retail store advertisement sign is covering country of origin claim.





NC Code 2 – Inconspicuous Example

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





NC Code 2 – Less than 50% Example

In the case where less than 50% of the items in a bulk bin have a country of origin, NC code 2 will apply.





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.





NC Code 2 – Smearred Example

COOL information has rubbed off the sign.





NC Code 2 – Missing Checkmark

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



COUNTRY OF ORIGIN

U.S.A.	<input type="checkbox"/>
CHILE.	<input type="checkbox"/>
MEXICO.	<input type="checkbox"/>
ECUADOR	<input type="checkbox"/>
OTHER	_____

NC 2

A photograph of a green label with the heading "COUNTRY OF ORIGIN" and a list of countries with checkboxes. A blue box labeled "NC 2" points to the checkboxes, which are all empty.



NC Code 3 – Not Accurate

NC code 3 applies when contradictory origin labels are visible to the consumer.

<u>Code</u>	<u>Non-Compliance Findings</u>
3	The country of origin declaration is not accurate at point of sale.



NC Code 3 – Not Accurate 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.





NC Code 3 – Not Accurate Example (cont.)

Product Look Up (PLU) sticker states USA; however, store sign states Lemons are product of Mexico.



USA	Leeks
Mexico	Lemons
USA	Lettuce



NC Code 4a – Use of And/OR

NC code 4a applies when disjunctive ("or," "and/or") and ambiguous ("may contain") are used (Product of USA and/or Argentina).

<u>Code</u>	<u>Non-Compliance Findings</u>
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.



NC Code 4a – Use of And/OR Example

PRODUCT OF: Argentina, Chile, Colombia,
Costa Rica, Ecuador, Guatemala, Peru or USA.





NC Code 4a – Use of And/OR Example (cont.)





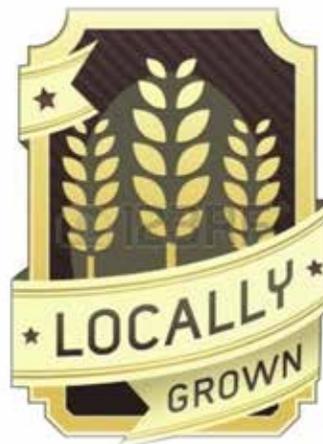
NC Code 4b – Indistinct Localities

NC code 4b applies when indistinct localities are used (i.e., locally grown)

<u>Code</u>	<u>Non-Compliance Findings</u>
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.



NC Code 4b – Indistinct Localities Example





NC Code 4c – Unacceptable Form

NC code 4c applies when production steps are missing. Production steps are only required for Chicken, Lamb, and Goat muscle cuts.

<u>Code</u>	<u>Non-Compliance Findings</u>
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.



NC Code 4c – Unacceptable Form Example

Based on the picture provided, the country of origin is Product of USA. However, the production steps are missing (i.e., hatched, raised, harvested).





NC Code 5 – Spelling and Abbreviations

NC code 5 applies when improper spelling or abbreviation for the country of origin are used.

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



NC Code 5 – Spelling and Abbreviations Example

- Belt Fish sign states “VIET/Wild”
- Lime with sign states “MEX”





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)



NC Code 6 – Missing MOP

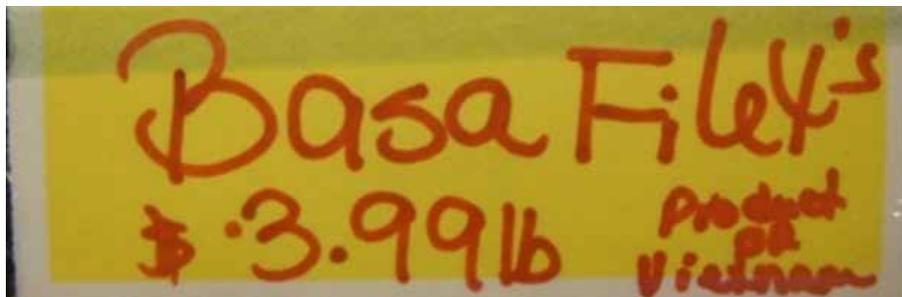
NC code 6 applies when the retailer did not convey the method of production at the point of sale in any manner.

<u>Code</u>	<u>Non-Compliance Findings</u>
6	Covered commodity is not identified with the method of production.



NC Code 6 – Missing MOP Example

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





NC Code 7 – MOP Illegible and/or Inconspicuous

NC code 7 applies when method of production is present at the point of sale; however, the information is smeared, obstructed, or not indicated on checkbox.

<u>Code</u>	<u>Non-Compliance Findings</u>
7	The method of production declaration is not legible and/or is not placed in a conspicuous location.



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.





NC Code 8 – Inaccurate MOP

NC code 8 applies when contradictory method of production information is visible to the consumer.

<u>Code</u>	<u>Non-Compliance Findings</u>
8	The method of production declaration is not accurate at point of sale.



NC Code 8 – Inaccurate MOP Example

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



- Store bar code label states "Wild Caught". Additional sticker states "Farm-Raised".





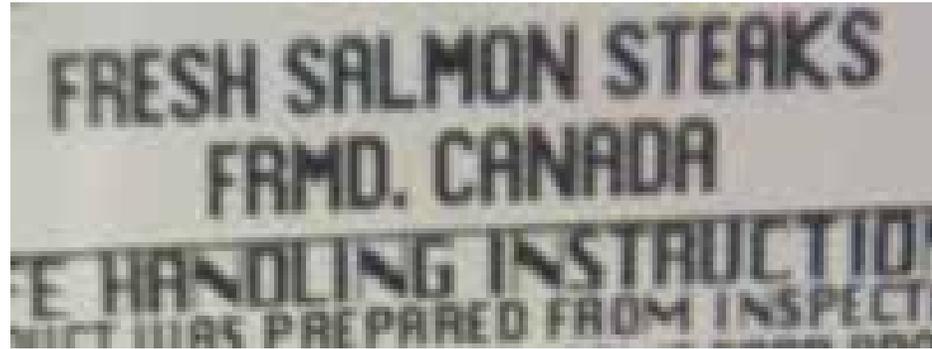
NC Code 9 – MOP Not in Acceptable Form

NC code 9 applies when the method of production is not stated as approved by the final rule: wild, wild caught, farmed, farm-raised.

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



NC Code 9 – MOP Not in Acceptable Form Example





NC Code 10 – No Records Within 5 Business Days

NC code 10 applies when the retailer does not provide records within the 5 business days provided by the COOL final rule. Reviewer will provide retailer with the record request due date.

CodeNC	Non-Compliance Findings
10	Records were not provided within 5 business days.



NC Code 11 – No Country of Origin on Records

NC code 11 applies when records do not provide the country of origin information. The country of origin may be abbreviated on records only provided the retailer can accurately decipher the information.

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



NC Code 12 – No MOP on Records

NC code 12 applies when records do not provide the method of production information. The method of production may be abbreviated on records only provided the retailer can accurately decipher the information.

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



NC Code 13 – No Supplier Information on Records

NC code 13 applies when records do not provide the Supplier information. Supplier records are required for all trace-back items. The required supplier information include supplier name and address (city and state at minimum).

<u>Code</u>	<u>Non-Compliance Findings</u>
13	Records do not provide the Supplier information. (Supplier records are required for all Traceback Items)



NC Code 14 – Record's Country of Origin

NC code 14 applies when the retailer states a different country of origin than the one provided by the supplier.

<u>Code</u>	<u>Non-Compliance Findings</u>
14	Records information for country of origin as provided by supplier is not accurately conveyed to point of sale label.



NC Code 15 – Record's MOP

NC code 15 applies when the retailer states a different method of production than the one provided by the supplier.

<u>Code</u>	<u>Non-Compliance Findings</u>
15	Records information for method of production as provided by supplier is not accurately conveyed to point of sale label.



NC Code 16 – Records for Pre-labeled item

NC code 16 applies when records identifying the immediate previous source for a pre-labeled item were not provided within 5 business days.

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



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.



Multiple NC Codes Example

NC code 1 and NC code 6 apply because the Cod Fillets are missing the country of origin and method of production.





Multiple NC Codes Example (cont.)

NC code 3 applies because the country of origin is inaccurate at the point of sale. The product label states Mexico, the top of the store sign states MEX/HAWI and the bottom of the store sign states Costa Rica. Also, NC code 5 applies because of the inappropriate use of abbreviations. The store sign states MEX/HAWI.





Multiple NC Codes Example (cont.)

NC code 2 applies because the possible countries of origin were listed but none of the checkboxes were selected. Also, NC code 7 applies because the method of production options were listed on the package but none of the checkboxes were selected.





Numerous Items

- There are instances when so many items are found to be non-compliant, it is not necessary to list each one. In the appropriate commodity category section, (1) Add the total number of liked commodities, (2) Describe the group of commodities, and (3) select the NC code that applies to the group of items. For example, 35 fresh fruit items sold in bulk – NC code 1.
- **IMPORTANT**: This should only be used when the amount of findings is too large to record in the workbook. Use the workbook space (including the Additional Items page 4) as much as possible.

Conducting an **Initial** Retail Surveillance Review



Initial Retail Surveillance Review

- When conducting an initial retail review, Reviewer will:
 - Review all covered commodities sold in store.
 - Record non-complying items and their NC code(s) in the appropriate initial review workbook.
 - Apply NC code 1-9 only to all findings.
 - Conduct 5 interview questions to the retailer responsible authority which are located toward the end of the Excel workbook.



Initial Retail Surveillance Review Interview Questions

- Interview questions are located at the end of page 3 of the Initial Retail Surveillance review Excel Workbook.
- The interview questions must be complete prior to leaving the retail store location.
- Interview questions assess retailer's recordkeeping compliance. Reviewer can provide interview questions during opening or closing meeting. Record the retailer's response without paraphrasing.
- Use your active listening skills to ensure the retailer's response is accurately recorded in each of the 5 questions located in the initial workbook.



Initial Retail Surveillance Review Interview Questions (cont.)

- Five (5) Interview Questions:
 - Q1 – 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 – Where are records maintained?
 - Q3 – How long are records maintained?
 - Q4 – As the responsible store authority, please briefly explain your knowledge of COOL requirements and your systems to ensure compliance.
 - Q5 – Would you be interested in receiving additional outreach materials and guidance from USDA's COOL program to assist your staff and consumers?

Conducting an **Follow-up** Retail Surveillance Review



Follow-up Retail Surveillance Review

- When conducting a follow-up retail review Reviewer will:
 - Review all covered commodities sold in store.
 - Verify previous year's non-compliances have been corrected.
 - Record non-complying items and their NC code(s) in the appropriate follow-up review workbook.
 - Apply NC code 1-16 to all findings.
 - Obtain picture evidence of store front, all non-compliances observed, and recordkeeping items at the time of the follow-up review.
 - Identify 1 item for each commodity category for where records will need to be provided by the retailer. Therefore, the reviewer will collect records for a total of 6 items, one for each commodity category section located in the follow-up workbook.
 - Include a summary in the comments section of the Checklist describing the retailer's performance compared to the previous year's review findings.



Follow-up Retail Surveillance Review Recordkeeping

- Each commodity category includes 1 recordkeeping section.

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):					



Follow-up Retail Surveillance Review Recordkeeping (cont.)

- The retail review list provided by USDA will provide 6 commodity category letters that designate the type of recordkeeping commodity that must be selected at the time of the review.

Example: A, E, H, J, M, P

*See Follow-up Retail Surveillance Review Procedures Chapter 10.2 for more details.

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



Follow-up Retail Surveillance Review Recordkeeping: ARE Pre-Labeled

Recordkeeping Requirements for commodity items that ARE Pre-labeled:

Records must identify the covered commodity and the retailers' immediate previous supplier's name and location (minimum of city and state).

*See Follow-up Retail Surveillance Review Procedures Chapter 10.2.5 for more details.



Follow-up Retail Surveillance Review Recordkeeping: ARE NOT Pre-Labeled

Recordkeeping Requirements for commodity items that is NOT Pre-Labeled:

Records must identify the covered commodity, country of origin, method of production (when applicable), and the retailers' immediate previous supplier's name and location (minimum of city and state).

*See Follow-up Retail Surveillance Review Procedures Chapter 10.2.6 for more details.



Follow-up Retail Surveillance Review Picture Evidence

- Pictures of store front, all non-compliances and recordkeeping item observed in store are required when conducting follow-up retail surveillance reviews.
- Pictures will be submitted with workbook once follow-up review is completed.
- Make every effort to provide pictures that are clear and legible. If necessary, take multiple pictures to properly record the non-compliance.



Follow-up Retail Surveillance Review Picture Evidence Example

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





Records Request Form

- If retailer is not able to provide records while the follow-up retail review is being conducted, provide the retailer with a Records Request Form.

 **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	
#	(e.g., Stone Brand, Ready-to-Eat Green Beans, 1lb unit, Prod. Of Mexico, Dist. by Green with Peas San Antonio, TX)
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 (cont.)

- The records request form will include:
 - The due date by which records need to be submitted.
 - Item name for which records are being requested
 - Description of records required.
 - Reviewer contact information where records will be submitted.
- According to the COOL Final Rule, retailers are required to provide records within 5 business days of request. Day 1 of 5 will begin the next business day.



Requirement

- Reviewer must be proficient in:
 - Conducting Initial Retail Surveillance Reviews and applying regulatory requirements as outlined by the COOL Final Rule and Initial Retail Surveillance Review Procedures.
 - Conducting Follow-up Retail Surveillance Reviews and applying regulatory requirements as outlined by the COOL Final Rule and Follow-up Retail Surveillance Review Procedures.

A woman with dark curly hair, wearing a pink long-sleeved top, is smiling warmly at a young boy in a blue shirt. They are in a grocery store produce section, surrounded by various fruits and vegetables. A silver scale is visible in the foreground. The scene is bright and cheerful.

Thank you for completing
Module 4!