

Livestock and Seed Program Standards, Analysis, and Technology Branch Room 2607-S 1400 Independence Avenue SW Washington, DC 20250 COOL Training Exam March 27, 2008

# **Country of Origin Labeling (COOL) Training Exam**

## Multiple Choice – 30 points

- 1. Which of the following establishments are required to label covered commodities for Country of Origin according to the Agricultural Marketing Act of 1946 as amended by the 2002 Farm Bill?
  - a. Butcher Shops
  - b. Full Line Supermarkets
  - c. Seafood Markets
  - d. Restaurants
  - e. All of the Above
- 2. All of the following options are processed food items that are excluded from COOL regulations EXCEPT:
  - a. Mussels in Tomato Sauce
  - b. Fish Sticks
  - c. Frozen Catfish Fillets
  - d. Seafood Medley
  - e. Canned Tuna
- 3. When conducting a review, which of the following should be listed on the worksheet?
  - a. Responsible Authority
  - b. Confirmation of address and a mailing address
  - c. Date of Review
  - d. Reviewer's Name
  - e. All of the Above
- 4. Which of the following COOL claims are in an acceptable form?
  - a. Farm-Raised Salmon, Product of U.S.A
  - b. Fresh Tilapia, Product of China, Ocean Caught
  - c. Alaskan Wild Scallops
  - d. Farmed Catfish, Product of ZN
  - e. None of the Above
- 5. Which of the following is a COOL violation that a store could be cited for during a review?
  - a. Failure to label product for Country of Origin
  - b. Failure to label cooked, jumbo shrimp.
  - c. Failure to maintain records
  - d. Both a and c
  - e. All of the Above



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- 6. Records that identify the retail store's supplier of a covered commodity that is chosen as a traceback item must be maintained for a period of...?
  - a. While the Product is on Hand
  - b. 1 year
  - c. 2 years
  - d. 3 years
  - e. Forever
- 7. Retailers and/or suppliers cited for willful violations of COOL can be fined for an amount up to \_\_\_\_\_ for each violation?
  - a. \$1,000
  - b. \$5,000
  - c. \$10,000
  - d. No Limit
  - e. Cannot be Fined
- 8. If a violation is identified, the reviewer should NOT do which of the following?
  - a. Explain to the Store Representative that the review is not official until it has been reviewed by the COOL Program Manager and notification has been sent of the violation(s)
  - b. Give a copy of the checklist and information sheet to the Store Representative
  - c. Disregard the finding if it is corrected while the reviewer is still present
  - d. Thank the retail representative for their time
  - e. Forward the completed review to the COOL Program Manager
- 9. Which of the following is an acceptable File Name?
  - a. VA 08 12 08 SEA N003
  - b. Texas 8 17 08 LPK 01
  - c. NC 06 11 2008 MO G015
  - d. PENN 7 1 08 ABC F110
  - e. All of the Above
- 10. When conducting a traceback on a store labeled item where the master container is not available, which of the following is <u>not</u> an acceptable document by itself to verify COOL information?
  - a. Store Log
  - b. Bills of Lading
  - c. Shipping Manifests
  - d. Receiving Documents
  - e. Labels saved from Master Container



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- 11. How many traceback items should be chosen at each review location?
  - a. 4
  - b. 2
  - c. 3
  - d. 6
  - e. 0

12. Which of the following should be done after the retail review?

- a. Email completed Excel COOL Workbook to coolaudit@usda.gov
- b. Include "findings" or "no findings" in the subject line of the submission
- c. Enter all information from the written worksheet onto the Excel COOL Worksheet
- d. Include any additional information in the *Additional Comments and Information* section of the Excel worksheet.
- e. All of the above
- 13. When should records be reviewed?
  - a. For all covered commodities found in the retail store
  - b. Only on traceback items
  - c. For any covered commodity(ies) found not to be in compliance with COOL regulations
  - d. It is not the reviewer's responsible to examine records; it is the responsibility of USDA

14. Which of the following is NOT a covered commodity?

- a. Squid
- b. Cooked Shrimp
- c. Shark Steaks
- d. Sushi
- e. Both b and d

15. Which of the following IS a covered commodity?

- a. Shrimp Cocktail
- b. Live Lobster
- c. Crab Salad
- d. Caviar
- e. Canned Tuna



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#### <u> True/False – 15 points</u>

- 1. If a reviewer cites a retail store for a violation and the retail store immediately corrects the violation while the reviewer is present, this action is sufficient to bring the store into compliance.
- 2. Steamed king crab legs are excluded from COOL requirements.
- 3. If a label has "Product of" followed by the U.S. flag, the store has failed to label the product correctly for Country of Origin.
- 4. A bag of raw shrimp labeled "Product of China, Thailand, and United States" is acceptable.
- 5. Abbreviations and variant spellings of countries of origin and methods of production are always acceptable.
- 6. A label stating, "Ocean Caught Alaskan Salmon" conveys country of origin and method of production designation in compliance with COOL regulation requirements.
- 7. Signs, placards, labels, twist ties, bands, and stickers in any shape, color, font, size, or location are acceptable for COOL identification as long as they are legible, placed in a conspicuous location, and do not cover any other mandated labels.
- 8. It is acceptable to conduct a COOL retail surveillance review without first identifying yourself to the retail officials, as long as you provide the findings to the retail facility after the review is concluded.
- 9. The purpose of conducting tracebacks during a review is to determine if the retail stores are complying with COOL record keeping requirements, to verify the accuracy of the retail store labels, and to collect information on the retail store's supplier of the item being traced.
- 10. The file name TN 07 08 08 SEA N001 is the appropriate naming convention for a review of a new store conducted in Tennessee on July 8, 2008 by SEA and assigned file number N001.



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- 11. The covered commodities that are selected for tracebacks should be identified with the country of origin and method of production information unless none of the covered commodities have COOL information.
  - 12. Cafeterias are considered covered retailers.
- 13. Findings will not be cited if the retailer is unable to provide supplier records at the time of the review.
- 14. The retail store will be cited if they cannot provide the estimate of covered commodities sold at the store.
- 15. Store logs are considered sufficient records to verify country of origin and method of production.

#### Put the Events in Sequential Order – 5 points

- 1. Introduce yourself to the retail store representative and explain the scope and objective of the review.
  - 2. Print out the worksheet and checklist
  - 3. Review all covered commodities to evaluate whether labeling is in compliance with COOL regulations.
  - 4. Prepare checklist for store representative
  - 5. Become familiar with COOL requirements and covered commodities



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# Match the COOL Claim with the type of Finding – 20 points

Finding:

- A. Failure to identify Country of Origin
- B. Failure to identify Method of Production
- C. Declaration of Country of Origin is not accurate
- D. Declaration of Method of Production is not accurate
- E. The abbreviations or variant spellings do not unmistakably indicate the Country (ies) of Origin
- F. Method of Production is not stated in an acceptable form
- G. Country of Origin and/or Method of Production declaration is not placed in a conspicuous location
- H. Retail records do not substantiate Country of Origin and Method of Production claim.
- I. No Violation

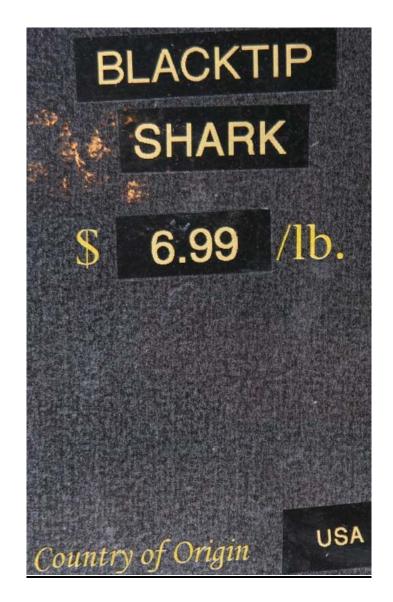
COOL Claim:

- \_ 1. Farm raised tuna steaks in a display case with no information regarding country of origin.
- 2. Traceback item: Wild shrimp from the U.S., Ecuador, and Chile in a bulk bin labeled with a sign above the bin stating "Product of the U.S.A."
- 3. Salmon from Canada is labeled as "Wild Caught Salmon Product of CAN"
- 4. Tilapia fillets are identified as "Product of the U.S.A.". A records review verified that the tilapia was from Panama and processed in the U.S.A.
- 5. The supplier records to verify the COOL claims for whole catfish were located at the retail store's headquarters and were provided the next business day.
- 6. The invoice provided by the retail store used for verification purposes for raw oysters only lists the names of the products and the price per unit.
- 7. The sign listing the names, country of origin, method of production, and prices of a display case of seafood is moved away from the display case where consumers are not likely to see it.
- 8. Pre-packaged halibut fillets are labeled "Product of Thailand Ocean Caught"
- 9. Pre-packaged raw, frozen shrimp labeled as "Product of China" are taken out of the package and re-packaged by the retail store and sold as "freshly thawed" raw shrimp without declaring the country of origin on the store label.
- 10. Stuffed flounder does not have method of production listed on the label.



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### Answer the Questions below the Corresponding Labels – 30 points



1. Based on the information, is this a covered commodity?	Yes	No	NA
2. Would this be considered a processed food?	Yes	No	NA
3. Can the Country of Origin be identified?	Yes	No	NA
4. Can the Method of Production be identified?	Yes	No	NA
5. Is this label in compliance with COOL regulations?	Yes	No	NA



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Salara Spin Autor   4 oc. (112p) about 9 1/4 top. (1.5p) zoout 12   100 0 </td <td>INGREDIENTS: WILD ALASKAN SALA. SODIUM PHOSPHATES AND SALT. MESQUITE SPICE PACKET INGREDIE AUTOLYZED YEAST EXTRACT, BLACK MESQUITE SMOKE FLAVORING. CONTAINS:FISH (SALMON).</td>	INGREDIENTS: WILD ALASKAN SALA. SODIUM PHOSPHATES AND SALT. MESQUITE SPICE PACKET INGREDIE AUTOLYZED YEAST EXTRACT, BLACK MESQUITE SMOKE FLAVORING. CONTAINS:FISH (SALMON).

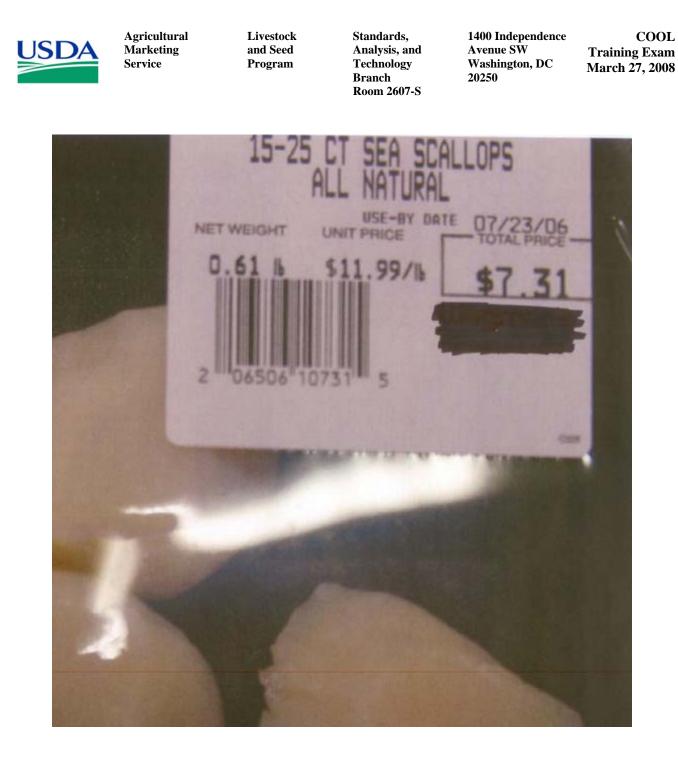
6.	Based on the information, is this a covered commodity?	Yes	No	NA
7.	Can the Country of Origin be identified?	Yes	No	NA
8.	Is the Country of Origin likely to be understood by the consumer?	Yes	No	NA
9.	Can the Method of Production be identified?	Yes	No	NA
10	. Is this label in compliance with COOL regulations?	Yes	No	NA



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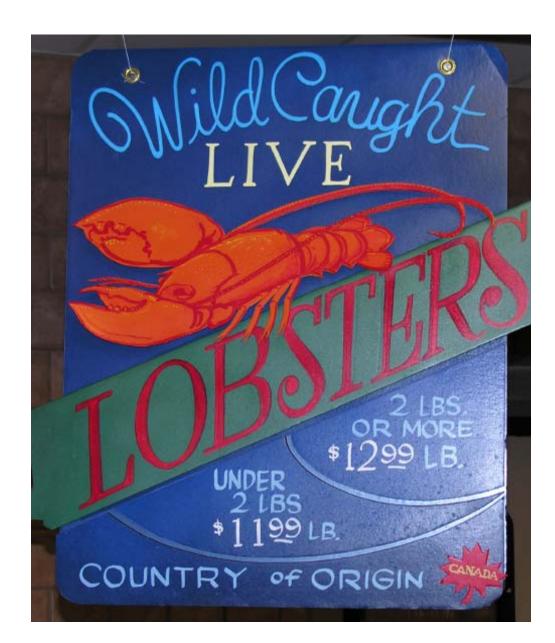
11. Based on the information, is this a covered commodity?	Yes	No	NA
12. Can the Country of Origin be identified?	Yes	No	NA
13. Is "PAN" an acceptable abbreviation for Panama For COOL requirements?	Yes	No	NA
14. Can the Method of Production be identified?	Yes	No	NA
15. Is this label in compliance with COOL regulations?	Yes	No	NA



16. Based on the information, is this a covered commodity?	Yes	No	NA
17. Can the Country of Origin be identified?	Yes	No	NA
18. Can the Method of Production be identified?	Yes	No	NA
19. Is Method of Production in a conspicuous location?	Yes	No	NA
20. Is this label in compliance with COOL regulations?	Yes	No	NA



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21. Based on the information, is this a covered commodity?	Yes	No	NA
22. Can the Country of Origin be identified?	Yes	No	NA
23. Is the Country of Origin in a conspicuous location?	Yes	No	NA
24. Can the Method of Production be identified?	Yes	No	NA
25. Is this label in compliance with COOL regulations?	Yes	No	NA



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26. Based on the information, is this a covered commodity?	Yes	No	NA
27. Can the Country of Origin be identified?	Yes	No	NA
28. Do the abbreviations and variant spellings clearly indicate Country of Origin?	Yes	No	NA
29. Can the Method of Production be identified?	Yes	No	NA
30. Is this label in compliance with COOL regulations?	Yes	No	NA