

COUNTRY OF ORIGIN LABELING

10 Tips for Handling Country of Origin Labeling Inspections

1. Make sure that you understand the country of origin labeling requirements and that you have a good program to ensure that all required information is present.
2. Identify a “key contact” for your company and e-mail that person’s name and contact information to USDA (cool@usda.gov).
3. When the inspector arrives, ask to see the inspector’s government-issued photo identification. Encourage your store manager¹ to meet with the inspector at the “opening meeting” that the inspector will hold.
4. Consider sending an assistant store manager to do a quick “run thru” of the store to look for any “stupid mistakes” that can be fixed before the store inspection begins.
5. Encourage your store manager to accompany the inspector during the store review. The inspector should not take photographs but will look throughout the store for all covered commodities and the country of origin information that should accompany them.
6. Encourage your store manager to meet with the inspector during the “closing meeting” after the store review has been completed.
7. Store manager should send the inspection checklist as well as any other information and observations to the key contact ASAP.
8. Key contact should review checklist and all materials received to determine follow up.
9. Implement appropriate changes and record those changes.
10. Respond to USDA within 30 days of a letter informing you of any errors in your country of origin labeling program.



Contact FMI’s Deborah White for more information dwhite@fmi.org.

¹ We have used “store manager” throughout, but fully recognize that a store manager will not always be available. Nonetheless, we encourage you to ensure that relatively high ranking store personnel are involved throughout this process.