

Perishable Agricultural Commodity

Grower / Producer	Packer / Shipper / Processor	Wholesaler / Distributor
Responsibility		
Provide enough information for an auditor to identify the county, state, and/or country where the product was grown.	Identify individual lots as to the country of origin. Maintain the integrity of the identification system. Properly label or identify all product sold	Maintain the integrity of the identification system. Identify and segregate individual lots as to the country of origin. Properly label or identify all product sold.
Examples of Records and Activities that may be useful.		
Official Inspection Certificates	Confirmations and memorandums of	Conformations and memorandums of purchase
Confirmation and Memorandums of Sales	purchases and sale	and sales
Harvest Records	Invoices on purchases	Invoices on purchases
Delivery Tickets	Receiving Record	Receiving records
Weight Tickets	Sales tickets	Sales tickets
Pesticide application record	Accounts of Sales	Account of Sales
Copies of statements (bills) of sales to customers	Daily inventories by lots	Records on repacking and relabeling
Purchase Records	Ledger records of purchases	Daily inventories by lots
Lost and damage claims documents	Packout records	Ledger records of purchase and sales
Production and Sales Contracts	UPC Codes	Packout records
Production Records	PLU labeling information	UPC codes
Sales tickets		PLU labeling information
Carrier Manifest		
Bill of Lading		
Pick tickets		
Ledger records of sales		

The examples of documents and records listed in this table, although extensive, are not inclusive of all documents and records that may be useful to verify compliance with the Country of Origin Labeling provisions of the 2002 Farm Bill. Additionally, maintaining documents and records such as those listed as examples will not necessarily ensure compliance. The documents listed are examples only and are for the sole purpose of providing information for producers, processors, and retailers to consider when establishing records for verification purposes. During a compliance audit conducted by USDA, auditors will review any and all documents to the extent necessary to arrive at an accurate decision on the level of compliance.