## CONSUMERS UNION'S "COOL TOOL": DON'T BE FOOLED BY COUNTRY OF ORIGIN LABELING (COOL); THIS GUIDE WILL TELL YOU WHAT IS COOL & WHAT IS NOT

As of September 30, 2008, federal law requires fresh meat, poultry, fish, fruits and vegetables, peanuts and certain nuts to display a label that tells you the country of origin (COOL) of the product. This can come in handy if you have just learned that, say, peppers from Mexico are believed to be contaminated with salmonella. If the peppers in your supermarket are labeled as coming from California, or Chile, that should reduce your salmonella worries.

Under a decades-old law, foods packaged (canned, boxed or bagged) in another country have had to be labeled as to where they came from. The new law extends the requirement to fresh perishable meat, poultry, fish and produce, so that now almost all food should have COOL.

But there are exemptions and exceptions to this new law, and the old one, that may mean that you might still be fooled about from where a food product came. Here are some contrasts as to what will need to be labeled and what still won't:

COOL (Must indicate country of origin.)	NOT COOL (Exempt from country of origin labeling.)
Meat sold in supermarkets.	Meat sold in butcher shops. Labeling is only required in stores that purchase a certain minimum amount (\$230,000) of fresh or frozen produce a year. Butchers do not purchase any produce, so meat sold by them is exempt.
Fish sold in supermarkets.	Fish sold in fish markets. Labeling is only required in stores that purchase a certain minimum amount (\$230,000) of fresh or frozen produce a year. Fish markets do not purchase any produce, so fish sold there is exempt.
Raw peanuts	Roasted peanuts, peanut butter (processed food is exempt).*
Pork chops	Ham and Bacon (processed food is exempt).* +
Sliced cantaloupe	Fruit Salad (mixtures are exempt).*
Raw almonds	Trail Mix (mixtures are exempt).*
Frozen carrots	Frozen peas and carrots (mixtures are exempt).*
Raw shrimp	Cooked shrimp (cooking is considered processing, which is exempt).* +
Fresh salmon	Smoked salmon (smoking is considered processing, which is exempt).* +
Frozen peas	Canned peas (processed food is exempt).*
Bagged lettuce	Bagged Mixed Salad Greens (mixtures are exempt).*
Lettuce in produce section	Lettuce in salad bars (restaurants are exempt, including supermarket salad bars).

<sup>\*</sup>Except if packaged or canned abroad, in which case COOL is required, under older laws.

'The Bush Administration's final rule on COOL was published on January 16, 2009. However, Tom Vilsack, the incoming Secretary of Agriculture, thought that portions of the final rule created loopholes that violated "the letter, spirit and intent" of the law and so, on February 20, 2009, he send a letter to the industry asking them to close those loopholes. For processing, the letter states, "The definition of processed contained in the Final Rule may be too broadly drafted. Even if products are subject to curing, smoking, broiling, grilling, or steaming, voluntary labeling would be appropriate." If the companies do not label such items with COOL, Secretary Vilsack has said the USDA would amend the regulations to require COOL in such cases.