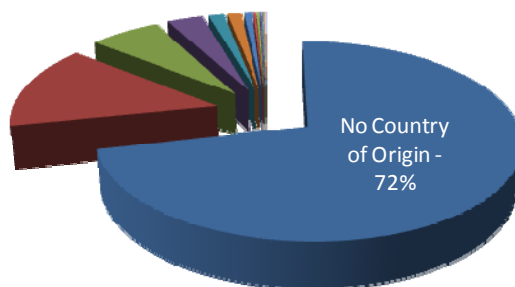


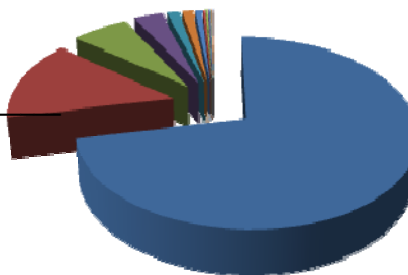
Retail Compliance FY 2009-2010

In 2009, COOL reviews were conducted in 5,003 retail stores. In 2010, retail reviews were conducted in 8,363 stores. This surveillance was conducted in stores located in all 50 states. The graphs below illustrate the findings of non-compliances cited during the past two years.

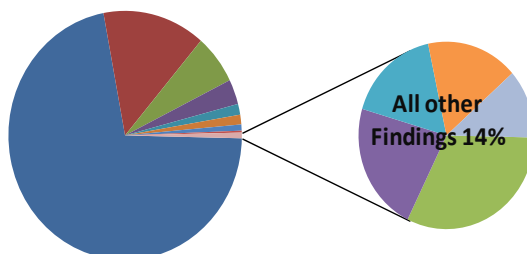


FY 2009 & FY 2010 COOL Retail Store Review Summary
- Most Findings of Non-Compliance Indicated Lack of Country of Origin Labeling

COOL Declaration Is Not Accurate 14%



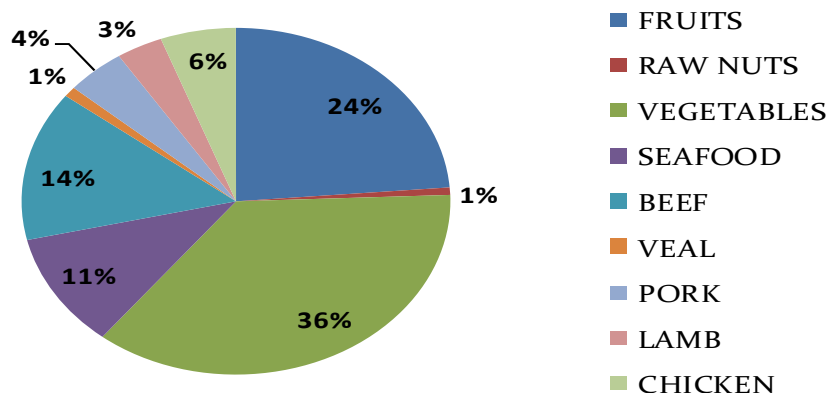
FY 2009 & FY 2010 COOL Retail Store Review Summary
- The Second Most Frequent Finding of Non-Compliance Indicated Inaccurate Country of Origin Labeling



FY 2009 & FY 2010 COOL Retail Store Review Summary
- All Other Circumstances of COOL Non-Compliance Accounted for the Remaining 14% of Findings

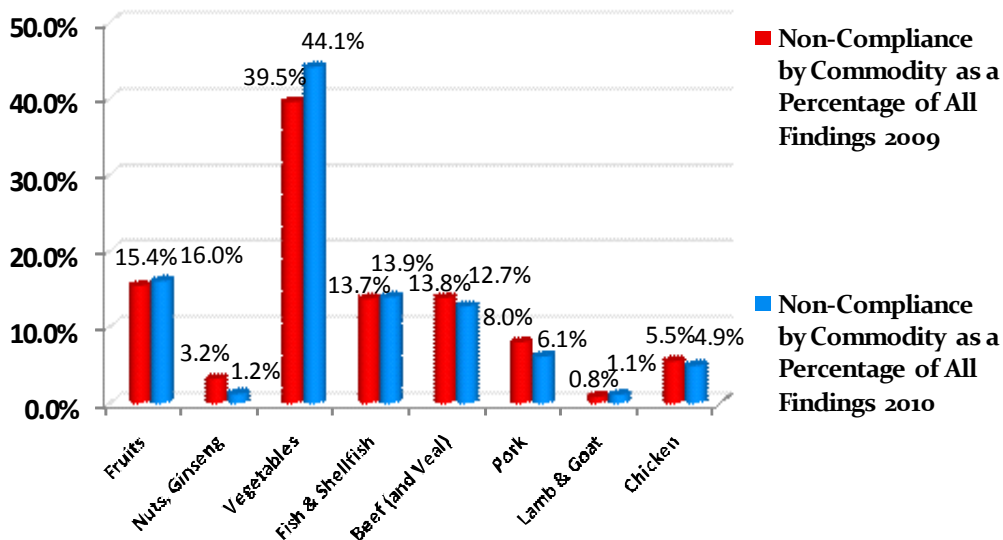


Estimated Percent of COOL Covered Commodities Sold at Retail Locations by Category



The values represented in the image above illustrates the relative percentage of the different types of covered commodities sold cumulatively across retail locations (but is not necessarily representative of the proportions present at any particular retail location and does not account for non-covered commodities).

Non-Compliance by Commodity as a Percentage of All Findings, 2009 and 2010



The most common area of COOL non-compliance violations during 2009 and 2010 occurred with fruit and vegetable covered commodities, citing more violations than any other commodity group. Overall, the percentage of non-compliances associated with a commodity group is consistent with the volume of covered commodities within the group offered for sale at the store. By implementing COOL standard operating procedures and remaining current with COOL requirements, retail store facilities can improve their level of COOL compliance.