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True Source Certified® Standards V4

Revision August 2016

*Providing Fully Traceable, Ethically Sourced Honey to Quality-Minded Consumers*

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## **Overview of True Source Certified®**

True Source Certified® is a voluntary system of origin traceability for those participants in an international supply chain who wish to demonstrate through an independent 3<sup>rd</sup> Party Audit Firm that their sourcing practices for honey are in full compliance with requirements of the True Source Certified® Standard.

True Source Certified® has been developed under a unique framework that encourages honest, open participation and accountability to a wider community coupled with 3<sup>rd</sup> party oversight to validate individual performance and claims. Under this model, participants are able to maintain the integrity of the program and hold each other accountable to honest sourcing practices. While many audits are purely individual in nature – involving only the audit firm and the client, Certified adds to that an element of industry-wide participation. True Source Honey LLC was founded in 2010 by companies within the honey industry that share a mutual desire to stop the practice of honey trade law circumvention and address the problems that this created in the industry ranging from two-tiered markets, inadequate quality assurance practices and risk to the pure and wholesome image of honey. These companies are competitive on all fronts but recognize that fair competition in the honey market will be advanced with a new system of country of origin traceability.

Therefore, True Source Honey, LLC has developed the True Source Certified® voluntary system of traceability for those participants who wish to demonstrate through an independent 3<sup>rd</sup> party that their sourcing practices are in full compliance with requirements of the True Source Certified® Standard. This system permits honey to be tracked from the consumer back through the supply chain to the country of origin and the Beekeeper that harvested the honey from the beehive. The basic responsibilities of each participant are as shown in Table 1.

It is through the application of these standards and the involvement of an independent 3<sup>rd</sup> party that trading partners can have the assurance of complete traceability and compliance with requirements of the True Source Certified® Standard.

<b>Participant</b>	<b>Responsibility</b>
<b>True Source Honey</b>	Establish and maintain the standards for certification
<b>3rd Party Audit Firm</b>	Conduct audits to evaluate compliance to the standards.
	Assign the True Source Certified® Identification Number to each load.
<b>Bee Keepers</b>	Produce and sell pure honey directly from their own operation.
<b>Processors/Exporters</b>	Purchase honey only from within their country of operation for resale/export.
	Maintain a system of traceability and use a True Source Certified® Identification Number for every load of honey.
	Maintain a system to ensure honey purity (freedom from economic adulteration and contamination)
<b>Importers</b>	Provide the required documentation to Packers related to the import of each load.
	Follow True Source Certified® Standards when purchasing certified loads of honey
<b>Packers</b>	Maintain a system of traceability and purchase True Source Certified® honey from certified participants in the supply chain.
	Maintain a system to ensure honey purity (freedom from economic adulteration and contamination)

Table 1

## 1. Background

### 1.1 Country of Origin and the Honey Industry

Food Safety is entirely dependent upon traceability and clear identification of the origins of food products entered into United States. Without proper declaration of country or origin, the task of assuring food safety becomes increasingly difficult and uncertain. Over the past several years, a definite trend showing decreases in Chinese honey imports and increases in imports from other countries suggests a shift in how honey is declared upon entry into the United States.

It is important to note that many of the countries listed as major Exporters of honey to the US do not have any current capacity for large scale, high volume commercial beekeeping. This would mean that any significant volume of honey exported from these countries has likely originated elsewhere.

What has been the response of the Honey Industry to this significant problem?

Because the honey industry is small and largely unregulated, individuals and companies have been forced to make their own decisions about what action to take.

Some companies have decided to take definite and pro-active steps to curtail these illegal activities. These companies have pledged to purchase only legally imported honey from trusted suppliers who can provide proven traceability for all product. True Source Honey, LLC recognized that merely making the claim was not sufficient. In order to provide complete assurance of the integrity of the claim it must be verified by an independent 3<sup>rd</sup> party. This is the origin of True Source Certified®.

True Source Honey firmly believes that consumers want products that clearly identify the origin of the products they consume. True Source Certified® was created to deliver just that – proven country of origin, fully traceable, 3<sup>rd</sup> party audited, pure honey. True Source Honey takes the position that every container of honey sold in the United States should clearly indicate where that product originated and certify that claim using an independent audit firm. This program has been established under the name True Source Certified®.

The True Source Certified system combines 3<sup>rd</sup> party audits, product sampling and oversight of container shipments in “High Risk” countries to identify and discourage potential transshipment schemes. While Certified applies to all participants in the supply chain, from Beekeepers, to Processor/Exporters, Importers and Packers – there are two critical areas of focus, the Exporter and the Packer. In order to provide complete assurance of traceability, participants must adhere to all of the elements of the standard. These include proper documentation, use of the True Source Certified® system of identification and in some countries, the use of 3<sup>rd</sup> party auditors to sample and seal loads in the country of origin prior to shipment.

## **1.2 Recent Enactment of Landmark Food Safety Legislation**

On December 21, 2010, Congress passed the “FDA Food Safety Modernization Act of 2010.” This legislation is designed to change the mission of the Food and Drug Administration (FDA), so the agency is focused on preventing food-borne illnesses rather than reacting after an outbreak occurs. For the honey industry, the most significant mandates relate to new import requirements that provide for tighter controls over imports.

The new food safety law contains a foreign supplier verification program whereby Importers will be required to verify that imported food and food ingredients are produced in accordance with U.S. food safety requirements. Each Importer is required to ensure proper country of origin, which may include monitoring of shipment records, lot-by-lot certification, annual on-site inspections of foreign suppliers, checking the HACCP plans of foreign suppliers, and periodic sampling and testing of shipments. If it appears that an Importer does not have such a foreign supplier verification system, honey or other food products offered for import will be refused admission to the U.S. Additionally, each Importer is required to maintain records related to its foreign supplier verification program for at least two years and make them available to the FDA upon request.

FDA is also authorized to require as a condition of granting U.S. entry of an imported food – an import certificate or other assurance from an agency or representative of the government from which the food originates (or an accredited third-party auditor), that the food complies with U.S. food safety law. If required by FDA, the food safety certification may be in the form of shipment-specific certificate, a listing of certified facilities or such other form as FDA may specify.

## 2. True Source Certified® Framework

### 2.1 Governing Body

True Source Honey, LLC and thus True Source Certified® are governed by an eleven member Board of Directors with international representatives, which includes Beekeepers, Exporters, Importers and Packers. Board members serve fixed terms that allow for rotation in the membership of the governing body. Future board members are selected from the pool of certified and participating members (Beekeepers, Processor/Exporters, Importers and Packers) and elected by a majority vote of the governing body. The governing body is intended to function as a multidisciplinary body that includes perspectives from as many points in the supply chain as practical.

### 2.2 Terms and Definitions

**3<sup>rd</sup> Party Audit Firm (audit firm):** An independent audit firm which has been contracted by True Source Honey LLC to manage the certification and auditing of True Source Certified®.

**3<sup>rd</sup> Party Auditor (auditor):** An individual employed by the contracted audit firm for the purpose of evaluating if the participant can demonstrate adherence to the True Source Certified® Standard.

**Advertising Use:** Any images, documents, signs, labels, containers or other items used to directly promote the sale of a product.

**Aggregator/Collector:** Intermediary companies that source honey from Beekeepers and then sell to Processor/Exporters.

**Announced Surveillance Audit:** An annual scheduled surveillance audit for Packers.

**Approved Country:** Any country with an established history of commercial honey production and export, which meets the criteria established by the TSH Board of Directors.

**Beekeeper:** Primary producer with direct ownership or control of honey production (bee hives).

**Bulk Plant/Factory:** A company located outside the United States operating a processing and warehousing facility where honey is received, tested, classified and maybe processed in preparation for bulk packaging (drums/totes) and export to foreign markets.

**Certificate of Certification:** Certificate in a format provided by the audit firm and issued to North American Packers and Processor/Exporters from Approved Countries upon successful completion of a certification audit, and submission of annual fees to True Source LLC.

**Certificate of Participation:** Certificate in a format provided by True Source Honey and issued to Importers of Record in North America and to North American Beekeepers upon completion of a registration form and submission of annual fees to True Source Honey LLC.

**Certification Audit:** The initial evaluation of the systems and procedures in place to demonstrate compliance to the True Source Certified® Standards. Certification audit applies only to Processor/Exporters from an approved country and North American Packers. This audit checks for previous six months of records during the audit of North American Packers and the previous 12 months records during the audit of Processor/Exporters.

**Certification Trademarks:** means the letters and words “True Source Honey” and “True Source Certified<sup>®</sup>” and the logo depicted in True Source “Terms of Use”.

**Certification:** Confirmation by the 3<sup>rd</sup> party Audit Firm of the compliance to the True Source Certified<sup>®</sup> standards by Packers and Processor/Exporters.

**Certified Company:** Packer located in North America or Processor/Exporter who has successfully completed a Certification Audit and certification has been granted.

**Certified Load:** One full ocean container load (FCL) or one full truckload (FTL) that meets the True Source Certified<sup>®</sup> Standards and has been assigned a True Source identification number. One load is approximately 42,500 lb or 19,400 kg of honey.

**Collective Membership Trademark:** Letters and words “True Source”.

**Collective Trademarks:** Letters and words “True Source Honey” and the logos depicted in True Source “Terms of Use”.

**Company:** For the purpose of this document, company includes cooperative, partnership, joint venture, business or other organizations.

**Co-Packer:** An entity which packages product without direct ownership. May be subject to facility audit as an extension of a Packer Audit. No certificate will be granted to a Co-Packer from extension participation in a Packer Audit. True Source Certified trademarks and logos cannot be used on co-packed product unless full True Source Certified Packer certification has been achieved by all Co-Packers of the logo-bearing product.

**CFIA:** The Canadian Food Inspection Agency (or CFIA) is a regulatory agency that is dedicated to the safeguarding of food, animals, and plants, which enhance the health and well-being of Canada's people, environment and economy. The agency was created in April 1997 by the Canadian Food Inspection Agency Act for the purpose of combining and integrating the related inspection services of three separate federal government departments: Agriculture and Agri-Food Canada, Fisheries and Oceans Canada, and Health Canada. The establishment of the CFIA consolidated the delivery of all federal food safety, animal health, and plant health regulatory programs.

**Economic Adulteration:** the fraudulent, intentional substitution or addition of a substance in a product for the purpose of increasing the apparent value of the product or reducing the cost of its production, i.e., for economic gain.

**FDA:** is a federal agency of the United States Department of Health and Human Services, one of the United States federal executive departments. The FDA is responsible for protecting and promoting public health through the regulation and supervision of food safety, tobacco products, dietary supplements, prescription and over-the-counter pharmaceutical drugs (medications), vaccines, biopharmaceuticals, blood transfusions, medical devices, electromagnetic radiation emitting devices (ERED), cosmetics, animal foods & feed and veterinary products.

**Honey:** Honey is the natural sweet substance produced by honey bees from the nectar of plants or from secretions of living parts of plants or excretions of plant sucking insects on the living parts of plants, which the bees collect, transform by combining with specific substances of their own, deposit,

dehydrate, store and leave in the honey comb to ripen and mature. Honey may not contain, or be combined with foreign sugars and maintain the designation Honey as defined in this document.

**Importer:** A company that purchases honey from a Processor/Exporter and is responsible for (1) ensuring the imported goods comply with local laws and regulations, (2) filing a completed duty entry and associated documents and (3) paying the assessed import duties and other taxes on those goods and then selling the honey to Packers.

**LTL:** Less than truckload quantity. Partial shipment or container load. Must meet True Source Certified Standards for full traceability and identification.

**Manufacturer:** A company that purchases honey from a Certified Packer in order to use the honey as an ingredient in the manufacture of food or non-food items as a functional or perceived enhancement to the product.

**Member Company:** Certified Companies and Participating Companies.

**Non-Advertising Use:** Means any images, documents, labels or other items not used to directly promote the sale of a product. Maintains ownership of honey while engaging in a Co-Packer arrangement.

**Packer:** A company in North America that is involved in blending, processing and repackaging raw honey in preparation for the retail, wholesale or bulk ingredient market.

**Participating Company:** A North American Beekeeper or an Importer who retains a Certificate of Participation.

**Processor/Exporter:** A company located outside the United States that operates a Bulk Plant/Factory for purposes of preparing honey for export.

**SAGARPA:** is a unit from the Federal Executive Branch of the Government of Mexico, which has among its objectives promoting the execution of a policy of support, which allows producers to improve their production practices.

**Standards:** means the rules and procedures contained in this document, and include the TSH Operating Agreement and any modification, variation or replacement of these documents.

**Surveillance Audit:** Once a company achieves certification, they will be subject to an annual announced or unannounced surveillance audit. A Surveillance Audit is similar to the Certification Audit in content but it checks for records for past 12 months or since last certification audit. It is an audit for continuation of True Source Certification.

**TSH:** Means True Source Honey, LLC, a District of Columbia not-for-profit organization, having its principal offices at One Massachusetts Avenue, N.W., Suite 800, Washington, DC 20001.

**True Source Annual Fee:** An annual fee assessed to a member company, allocated for the maintenance of the standards, website, and associated marketing materials. The North American Beekeeper membership is renewed every 3 years with fees to be paid at the time of original registration or upon renewal.

**True Source Certified® Identification Number (ID#):** The ID# is a unique number, randomly generated and managed by the 3<sup>rd</sup> party audit firm. It is assigned to each certified load.

**True Source Certified® Seal:** A seal bearing the unique True Source Certified® Identification number (ID#), applied to a certified full ocean container load.

**True Source Certified® Standards:** A voluntary traceability system which enables a certified company to validate their compliance through the use of a 3<sup>rd</sup> party auditor. The requirements are defined in each industry sector (see Section 3 and Section 4).

**Unannounced Surveillance Audit:** An annual unscheduled and unannounced surveillance audit for Processors/Exporters.

## 2.3 Approved Countries for Export Certification

### 2.3.1 Approval Criteria – Current Exporting Countries

Any country with an established history of commercial honey production and export is eligible for participation through successful completion of a Processor/Exporter audit. In order to determine if a country is eligible for certification at this level, the following criteria apply:

- 2.3.1.1 Country has an established and verifiable honey crop history.
- 2.3.1.2 Country has an established and verifiable crop history of available honey for export.
- 2.3.1.3 Country has an established and verifiable honey export history.
- 2.3.1.4 The criteria is statistic based and includes data collected from U.S. Dept. of Commerce (United States Import Statistics Commodity: 0409, Honey, Natural), Foreign Agricultural Service and the Food and Agriculture Organization of the United Nations (FAOSTAT report - export quantity) to name a few.

**The following countries meet the approval criteria and established risk ratings.**

Low Risk*	High Risk**		
Argentina	Australia	Greece	Russia
Brazil	Austria	India	Spain
Canada	Bulgaria	Israel	Switzerland
Chile	China	Italy	Thailand
Guatemala	Czech Republic	Moldova	Turkey
Mexico	Dominican Republic	Poland	Ukraine
New Zealand	Egypt	Portugal	United Kingdom
United States	France	Pakistan	Vietnam
Uruguay	Germany	Romania	

Table 2

\* Additional requirements may be applicable to High and Low Risk Countries.  
E.g., India (Financial Audit), Vietnam (Certificate of Origin Form B), Brazil (Beekeeper field audits).

\*\* High Risk Countries: 3<sup>rd</sup> party audit firm supervises container loading + sampling/laboratory analysis.

### **2.3.2 Risk Level – Current Exporting Countries**

A risk level for each country is established based upon the following criteria:

- 2.3.2.1 Consistency of honey crop exportation.
- 2.3.2.2 Approved import standards into major trade countries.
- 2.3.2.3 Documented history of illegal circumvention of US and International Trade Laws.
- 2.3.2.4 Alleged history of illegal circumvention of US and International Trade Laws.

### **2.3.3 New Exporting Countries – High Risk**

Countries not shown on the table do not meet the current approval criteria, can only be added as a High Risk country, and are subject to the following:

- 2.3.3.1 Any Registered or Certified True Source participant may request an addition to the approved list of countries. The submitter will not be required to provide statistical data with the request.
- 2.3.3.2 Countries must be specifically named.
- 2.3.3.3 Once the request is made, True Source Honey will gather the necessary statistical information for the country
- 2.3.3.4 If the country does not have the statistical information necessary for inclusion as an approved country, a request for additional information may be issued to the original submitting participating member.

If satisfactory official documentation is not provided, the request for inclusion on the approved countries list may be denied.

- 2.3.3.5 Submissions to True Source Honey for inclusion on the approved list will be evaluated during the first quarter of each year. Submissions received after January **15th of any** given year will be evaluated during the subsequent first quarter. The BOD has three months to give a written determination of eligibility or denial of request to the original industry member submitter. Additionally, the board will have until the following January, or no less than twelve months from the date of written eligibility determination to create audit criteria for any newly approved country.
- 2.3.3.6 Honey Industry members who are not True Source Certified® participating members may request an addition to the approved list of countries. The aforementioned process will apply with the exclusion of a specified timeline. The BOD will review the submitted

countries with priority given to countries which have the largest export volume to the United States.

### 3 Certification

#### 3.1 Certification for Packers

**Packer:** A company in North America that is involved in blending, processing and repackaging raw honey in preparation for the retail, wholesale or bulk ingredient market.

##### 3.1.1 Register for Certification (Packers)

- 3.1.1.1 Submit a Registration Form to the Audit Firm.
- 3.1.1.2 Complete the pre-certification questionnaire – issued by the audit firm prior to the first audit. Include all requested documentation.
- 3.1.1.3 Schedule an Audit: Once a registration form has been submitted, and approved by the Audit Firm. The Packer is eligible to schedule an audit. The cost of the audit will be determined by the audit firm and vary depending upon the individual rates in the country or region in which it is conducted and will include an audit fee and auditor expenses.

##### 3.1.2 True Source Certified<sup>®</sup> Standards (Packer)

Year	Fully Compliant Load Percent (%)	Minimally Compliant Load Percent (%)	Non-Compliant Load Percent (%)
2015	40	35	25
2016	50	30	20
2017	60	25	15
2018	70	20	10
2019	80	10	10
2020	90	5	5

Table 3

- 3.1.2.1 Phased Adoption of Standard: In order to avoid restriction in sources of supply and minimize the effect of certification on market pricing, True Source Certified<sup>®</sup> will phase-in over multiple years for Packers (see Table 3). This will allow all interested participants to integrate True Source Certified<sup>®</sup> sourcing practices into their supply chain.
  - 3.1.2.1.1 By 2020, 90% of any Certified Packers sourcing must come from Fully Compliant participants (Certified Processor/Exporters, Registered Importers and Registered Beekeepers). Packers that do not meet the minimum percentages in any year of phase-in are not eligible for certification. See Table 3.
  - 3.1.2.1.2 An Emergency Clause may be initiated by the True Source Board of Directors should normal trade channels be disrupted. Examples could include, but are not limited to an act of nature (drought, flood hurricane etc.), imposition of new barriers to trade by

governments or discovery of a prohibited substance in the supply chain. The Emergency Clause could permit a temporary allowance for Non-Compliant loads or Minimally Compliant loads of honey at specified percentages or from specified origins until normal conditions of trade are restored.

**Fully Compliant Load:** A load of honey may be described as Fully Compliant if it meets the following conditions:

- The Processor/Exporter must have successfully completed a Certification Audit and all subsequent Surveillance Audits.
- The Importer must be a registered participant with True Source Certified®.
- Beekeepers selling directly to North American Packers (excludes Beekeepers producing less than 40,000 pound per year) must be:
  - Registered with True Source.
  - Registered as a Food Facility with the FDA
  - Canadian beekeepers must meet the export requirements of the CFIA
  - Mexican beekeepers must meet the export requirements of the SAGARPA
- The Packer must have successfully completed a Certification Audit and all subsequent Surveillance Audits. (Not applicable to initial certification audit).
- All required documentation must accompany each load or shipment, including the use of the True Source Certified® Identification Number and evidence of 3<sup>rd</sup> party pre-shipment inspections where applicable.

**Minimally Compliant Load:** A load of honey may be described as Minimally Compliant if it meets the following conditions:

- The Packer must have successfully completed a Certification Audit and all subsequent Surveillance Audits. (Not applicable to initial certification audit)
- All required documentation must accompany each load or shipment (see below).
- Beekeepers selling directly to North America Packers (excludes Beekeepers producing less than 40,000 pound per year) must be
  - Registered with True Source
  - or
  - Registered as a Food Facility with the FDA
  - Canadian beekeepers must meet the export requirements of the CFIA
  - Mexican beekeepers must meet the export requirements of the SAGARPA
- All loads or shipments from High risk countries are not eligible for Minimal compliance; they must achieve full compliance to participate.

**Non-Compliant Load:** A load of honey that has not been certified is considered non-compliant if the following conditions apply:

- Loads are not classified as Fully or Minimally compliant.
- Loads or shipments that cannot be associated with all or some required documentation.
- Failure to maintain any single element of certification.
- A percentage of non-compliant loads greater than described in Table 3 will cause a participant to lose their certification.

3.1.2.2 Purchase Honey from Approved Countries (see 2.3, Approved Countries).

3.1.2.3 Maintain a system of traceability:

- Clearly identify all shipments of honey that arrive to or are shipped from the plant.
- Maintain the identity of individual lots of raw honey from specific suppliers as honey is processed to create product for the retail, wholesale or bulk ingredient market.

3.1.2.4 Maintain required documentation for every purchase shipment of raw honey

- a. **CBP Form 3461** showing: 0409.00 in box 24, Country of Origin in box 25 (must be the same as the one declared on the invoice to the Packer), Container no in box 29 (must match the number declared on the bill of lading and the invoice to the Packer )
- b. **Ocean/Bill of Lading** copy showing: Place of receipt must be from the same country as the Processor/Exporter and the country of origin declared on the CBP form 3461, Shipper must be the Processor/Exporter, Consignee or Notify party must be the same as the seller to the Packer, True Source Honey ID# (see section 3.1.2.1), Exporter's lot number.
- c. **Analysis Report: Pollen-geographical origin of honey (See Section 6 for Approved Laboratories)**  
For High risk origins, the audit firm must sample each load and confirm country of origin through a pollen analysis with an approved laboratory. A copy of the laboratory report, stating the country of origin, must be supplied to the Packer for each certified load. The True Source Certified® ID number assigned to that load must be the sample identification number stated on the laboratory report.
- d. **Country-Specific Export Documents:**

All high risk countries- – all shipments must include the local sampling report issued by the audit firm.

India – all shipments must include the local sampling report issued by the audit firm and the Export Inspection Consul (EIC) certificate for inspection.

Vietnam – All shipments must include Certificate of Origin Form B.

- e. **Truck Bill of Lading:** Must indicate container number, True Source Honey ID#, Exporter lot number.
- f. **Delivery order:** If the container is delivered directly to the Packer, Importer must supply the delivery order showing the following information: container number, both seal numbers: container seal and audit firm seal (as applicable), True Source Honey seal ID#, Exporter's lot number.
- g. **Warehouse inbound receipt:** If the load is picked up by the Packer or delivery arranged by the seller to the Packer the following information must appear on the warehouse receipt: Container number, container and audit firm seal number (as applicable), True Source Honey ID#, Exporter's lot number.
- h. **Commercial Invoice:** Must include the following information: container number, country of origin, importer name, packer name, exporter, exporter lot number, product description and True Source Honey ID#.

3.1.2.5 Successfully complete audit by 3rd Party Audit Firm

### **3.1.3 Certification Audit (Packers)**

The Certification Audit will evaluate the Packer against their ability to adhere to True Source Certified® standards. The following elements will be key components of the audit.

3.1.3.1 Evaluate the system of traceability as it applies to maintenance of required records, purchase transactions and practice within the facility. Initial clients are subject to an audit on past six months of records while pre-certified clients will be audited to past 12 months of records or records since last audit.

3.1.3.2 Twelve consecutive months of active facility operations, blending, processing and repackaging raw honey, must occur prior to any scheduled audit.

3.1.3.3 For the initial audit, a minimum of 6 months purchasing history must be provided to confirm required compliant load percentages have been met.

3.1.3.4 Each load purchased and imported must have an associated True Source Certified® seal with ID # and that number must be valid.

3.1.3.5 Collect random samples of honey inventory to compare against stated origin (pollen).

Note: Any honey subject to random sampling and analysis must contain sufficient pollen to permit determination of country of origin.

- a. Absence of pollen is treated as a failure of the analysis
- b. The use of filtration, equipment, technology, or any processing applications using materials that change the fundamental composition of honey during collection, processing or packing activities is treated as a failure of the analysis and constitutes a failure of the audit.

If processed/filtered honey is imported for resale, the Processor/Exporter of that product must be certified to True Source Certified® Standards for Import to Direct US Distribution.

3.1.3.6 Select one or more suppliers at random to participate in a Supplier Assessment to confirm stated volumes of purchase (domestic suppliers). Non-domestic supplier could be subject to phone interviews.

3.1.3.7 Maintain a system to ensure honey purity (freedom from economic adulteration or contamination) to protect consumers.

- a. Packers will maintain a system to analyze honey purity and demonstrate the system implementation.
- b. AOAC or equivalent methodology
- c. If evidence of sufficient purity testing is not available, samples obtained for origin analysis may also be subject to analysis for purity

3.1.3.8 To reduce on-site paperwork handling and time required at a facility, applicable documents may be copied and sent with the auditor to complete the full audit process

- a. Full confidentiality is applicable to all documents used or obtained during the audit process.
- b. All copied documents sent off-site with the auditor will be destroyed after examination, at the completion of the audit process

- c. The audit process is not complete until the auditor finds sufficient evidence of Standards compliance through documentation, observation and verbal communication.

3.1.3.9 Surveillance Audit: Once a Packer achieves certification, they will be subject to an annual announced surveillance (recertification) audit. A Surveillance Audit is identical to the Certification Audit in content. Supplier Assessment is mandatory for initial and recertification audits.

3.1.3.10 If any audit is unsuccessful, a period of six months must pass before a second audit can occur. If the audit is unsuccessful a second time, a period of 1 year must pass before an additional audit can occur. This would cause the client's certification status to be considered suspended.

\*A major or critical non-conformance occurring during any audit, that cannot be corrected, will result in immediate suspension of certification and logo use.

3.1.3.11 Upon successful completion of the audit, the audit firm will notify True Source. True Source will issue an invoice for the True Source annual fee and upon receipt of payment will instruct the audit firm to release the Certificate of Certification, Packer Tool Kit which includes POS materials.

Pounds Processed/Handled	Annual Fee (USD)
0 – 2 Million Pounds	\$250
2.1 - 5 Million Pounds	\$500
5.1 - 15 Million Pounds	\$1000
16-30 Million Pounds	\$1500
31-60 Million Pounds	\$2000
61+ Million Pounds	\$2500

## 3.2 Certification for Processor/Exporters

**Processor/Exporter:** A company located outside the United States that operates a Bulk Plant/Factory for purposes of preparing honey for export.

### 3.2.1 Register for Certification (Processor/Exporters)

3.2.1.1 Submit a Registration Form to the audit firm.

3.2.1.2 Complete pre-certification requirements (if any – country specific).

3.2.1.2.1 India: Processor/Exporters and all associated companies must first successfully pass a financial audit by the licensed certification entity for financial audits to determine if they have purchased honey from outside the production country prior to scheduling a True Source Certification audit.

3.2.1.3 Schedule an Audit: Once a registration form has been submitted and approved by the audit firm, and any applicable pre-certification requirements have been met, the Processor/Exporter is eligible to schedule an audit. The cost of the audit will be determined

by the audit firm and vary depending upon the individual rates in the country or region in which it is conducted and will include an audit fee and auditor expenses.

### **3.2.2 True Source Certified® Standards (Processor/Exporters)**

- 3.2.2.1 Purchase, process or handle honey only from within the country of operation – requires that the Processor/Exporter is operating in an approved country (see section 2.3, Approved Countries). The importation of honey for processing, handling or export is prohibited under True Source Certified® Standards.
- 3.2.2.2 Twelve consecutive months of active facility operations, blending, processing and repackaging raw honey, must occur prior to any scheduled audit.
- 3.2.2.3 For the initial audit a minimum of 12 months verifiable export history (would not have to be specifically export to the US) prior to an audit.
- 3.2.2.4 Establish and maintain a system of traceability.
  - 3.2.2.4.1 Include records of all purchases from Beekeepers and collectors.
  - 3.2.2.4.2 Include a system of traceability than can account for the blending of various lots from different suppliers to create a shipping batch.
  - 3.2.2.4.3 Clearly identify all shipments of honey that arrive to or are shipped from the processing plant or other warehouse facilities using the established system of traceability.
  - 3.2.2.4.4 Clearly label all individual drums within each certified load as follows:
    - a. Product: Honey
    - b. Country of Origin
    - c. Exported by : Processor/Exporter Name and address
    - d. Imported by: Importer Name and Address
    - e. True Source Certified® ID number
    - f. Lot number (as per Processor/Exporter traceability system)
    - g. Drum number
    - h. Gross, Tare, Net weight (if not included in shipping documents)
  - 3.2.2.4.5 Each certified load must be sealed using a True Source Certified® Seal.
  - 3.2.2.4.6 For High risk Countries – audit firm will randomly sample drums prior to shipment and supervised container loading. Drums and container must be sealed using a True Source Certified® Seal.
  - 3.2.2.4.7 Export documentation:  
Ocean/Truck Bill of Lading must contain the following information:
    - a. Shipper must be the Processor/Exporter
    - b. Place of receipt must be from the same country as the Processor/Exporter
    - c. Description must contain the following information:
      - 1. Honey
      - 2. Quantity

- 3. True Source ID#
- 4. Processor/Exporter lot number
- d. Buyer must be the consignee or the notify party
- e. In the case of Ocean Bill of Lading: Ocean Container Number

Country-Specific Export Documents:

- India – all shipments must include the local sampling report issued by the audit firm and the Export Inspection Consul (EIC) certificate for inspection.
- Vietnam – all shipments must include Certificate of Origin form B.

Analysis Report: Pollen-geographical origin of honey

For high risk countries, there must be a copy of the laboratory report stating the country of origin for each certified load. The report must include as the sample identification number stated on the report, the True Source Certified® ID number assigned to that load by the 3<sup>rd</sup> party audit firm.

**3.2.3 Certification Audit (Processors/Exporters)**

3.2.3.1 The Certification Audit will evaluate the Processor/Exporter against their ability to adhere to True Source Certified® standards. The following elements will be key components of the audit.

3.2.3.1.1 Document Audit

- a. Traceability programs and process flow charts for raw materials through processing to shipment.
- b. Purchase and sales transactions including approved supplier lists with complete contact information.
- c. Shipping document review.
- d. Reconciliation of pounds/kilos purchased against pounds/kilos sold.
- e. Invoices for purchase and sale, bills of lading, drum purchasing records.

3.2.3.1.2 Sample Collection: The audit firm will collect random samples of RAW honey inventory to compare against stated origin (pollen). Note: any honey subject to random sampling and analysis must contain sufficient pollen to permit determination of country of origin.

- a. Absence of pollen is treated as a failure of the analysis
- b. The use of filtration, equipment, technology, or any processing applications using materials that change the fundamental composition of honey during collection, processing or packing activities is treated as a failure of the analysis and constitutes a failure of the audit.

3.2.3.1.3 Suppliers (Beekeepers and collectors) will be selected at random to participate in a field audit to confirm stated volumes of trade.

3.2.3.1.4 Maintain a system to ensure honey purity (freedom from economic adulteration or contamination). To protect consumer.

- a. Processors/Exporters will maintain a system to analyze honey purity and demonstrate the system implementation.
- b. AOAC or equivalent methodology

- c. If evidence of sufficient purity testing is not available, samples obtained for origin analysis may also be subject to analysis for purity

**3.2.3.1.5** Surveillance Audit: Once a Processor/Exporter achieves certification, they will be subject to an annual surveillance audit. A Surveillance Audit may be announced or unannounced and is identical to the Certification Audit in content.

**3.2.3.1.6** If any audit is unsuccessful, a period of six months must pass before a second audit can occur. If the audit is unsuccessful a second time, a period of 1 year must pass before any future audits can occur. This would cause the client's certification status to be considered suspended.

\*A major or critical non-conformance occurring during any audit, that cannot be corrected, will result in immediate suspension of certification and logo use

**3.2.3.1.7** Upon successful completion of the audit, the audit firm will notify True Source. True Source will issue an invoice for the True Source annual fee and upon receipt of payment will instruct the audit firm to release the certification. The annual fee is allocated for the maintenance of the standards, website and associated marketing materials.

Containers Exported to US/Year	Annual Fee (USD)
0-50	\$500
51-100	\$1000
101-150	\$1500
151-250	\$2000
251 +	\$2500

Table 2

### 3.3 Audit and certification procedures

#### 3.3.1 Audits may only be conducted by a third-party audit firm approved by the True Source Honey Board.

The third-party audit firm is directly responsible for:

- Audit administration, scheduling, contracting and reporting audit results to client
- Issuing of certificates
- Handling complaints and appeals (see section 5.2 Complaints and Appeals)
- Auditor oversight, auditor training, ongoing updates/education of auditors, auditor calibration, auditor performance and competence. The third-party audit firm is also responsible to maintain consistency in its auditors' interpretation and application of Program requirements, to ensure consistent delivery of program audits. To achieve this, each third-party audit firm must develop and deliver in-house expertise to support its Program auditors, and must maintain regular contact with auditors and routinely handle questions about program requirements.

#### 3.3.2 Auditor Requirements

To become a program auditor, individuals must be:

- Experienced auditor
- Experience in food schemes
- Experience auditing schemes that have a traceability component
- Experience with on-site sampling

- Experience / training in the field of production and traceability for food processing eligible in the area of general foodstuffs (at least 2 years).
- Evidence of at least 10 audits/inspections.

### **3.3.3 New auditors**

- Undergo 1 shadow or witness audit with an experienced auditor to be qualified to audit to the True Source standard.
- Witness audit is preferred over shadowing an experienced auditor, but consideration to a shadow only will be given due the low number of audits annually in a given area.
- On-going monitoring and evaluation of Auditor by the certification bodies must include:
  - Participation in random evaluation process, to help determine auditor compliance and consistency of results, to potentially include:
    - Witness audits
    - Review of auditor's scoring/audit results
    - Additional witness audits as needed if concerns are identified during the review process
    - Scheduled performance review once every four years to determine if auditor meets current auditing requirements, re-evaluation to comprise of program participant feedback, results of witness audits and applicable courses attended.

## **3.4 Report Reviews and Certification Decisions**

### **3.4.1 Eligibility**

To be eligible to review audit reports and make certification decisions, individuals must meet the auditor requirements set out in section 3.3.2. Auditors must not review or make certification decisions on their own audits.

### **3.4.2 Assignment of Auditors (Consecutive Audits at the same site)**

To protect against threats to impartiality, the same auditor cannot be assigned to perform Program audits on-site at the same site for more than four (4) consecutive audits. This restriction does not apply to the participation of an auditor in shadow or witness audits, or to auditors reviewing self-declarations and self-assessments.

## **3.5 Certificate Validity**

**3.5.1** Certificates are valid for 12 months. A certificate is not transferable from one owner to another when an operation changes owner. In this case a new certification audit is required.

**3.5.2** Certificates may be extended in exceptional cases (e.g. extenuating circumstances such as a strike, severe weather or illness). The THIRD-PARTY AUDIT FIRM may be requested to extend the validity period of the certificate beyond its original expiry date. The validity may be prolonged beyond the 12 months (for a maximum period of 4 months) only under the following conditions:

- a. The extension is granted by the Third-party audit firm prior to certificate expiry, and
- b. The audit will occur during the extension period, and

- c. Justification for the extension is recorded as per the THIRD-PARTY AUDIT FIRMS internal procedures.

### **3.6 Certification Decisions**

**3.6.1** The Third-party audit firm shall make the certification decision within a maximum of 20 business days after the audit. If a program participant is not certified because the company has failed the audit, but the participant implements corrective actions, the Third-party audit firm shall make the certification decision within a maximum of 20 business days after the closure of the Corrective Action Requests (CARs).

- The reviewer is impartial and technically capable of understanding the content of reports and that the reports are accurately assessed to demonstrate satisfactory evidence of compliance with the Program.
- All requirements of the standard have been fully covered, using any supporting notes made during the audit by a suitably qualified auditor.
- The scope of the report covers the scope applied for by the client and that the report provides satisfactory evidence that all areas of the scope have been fully investigated.
- All areas of non- conformity have been identified and effective corrective action has been taken to resolve these non-conformities.

### **3.7 Suspensions and Decertification**

**3.7.1** The third-party audit firm shall have a policy and documented procedure(s) for suspension certification and decertification and shall specify the subsequent actions by the third-party audit firm.

**3.7.2** The third-party audit firm shall suspend certification in cases when, for example, the client's certified traceability system has persistently or seriously failed to meet certification requirements:

- And/or the certified client is found to be engaged in fraudulent or illegal activities such as misrepresenting country of origin, falsifying documents, selling non-honey as Certified True Source Honey or not adhering to the True Source Certified logo Terms of Use.
- The certified client does not allow surveillance or recertification audits to be conducted at the required frequencies, or the certified client has voluntarily requested a suspension.
- Under suspension, the client's certification is temporarily invalid. The third-party audit firm shall have enforceable arrangements with its clients to ensure that in case of suspension the client refrains from further promotion of its certification. The third-party audit firm shall inform True Source of any suspensions or de-certifications, make the status of the certification publicly available and shall take any other measures it deems appropriate.
- True Source Materials, including Exporter True Source Seals, shall be returned to True Source Honey. True Source Certified logo use shall be discontinued as required in the Terms of Use.

Failure to resolve the issues that have resulted in the suspension in a time established by the third-party audit firm shall result in decertification. NOTE In most cases the suspension would not exceed 6 months.

## 4 Participation

### 4.1 Participation for Beekeepers

**Beekeeper:** Primary producer with direct ownership or control of honey production (bee hives).

#### 4.1.1 Register to Participate

4.1.1.1 Submit a Registration Form to True Source to become a participant.

4.1.1.2 North American Beekeepers producing less than 40,000 pounds per year are not required to register to be fully compliant when selling to an Exporter or Packer.

4.1.1.3 Complete a registration form ([www.tshmember.com](http://www.tshmember.com)) and submit the form and registration fee to True Source Honey. The registration fee is payable once every three years.

4.1.1.4 Registration and full payment of True Source Fee is required to have company logo posted on the True Source Honey website – regardless of pounds produced per year.

#### 4.1.2 Follow True Source Certified® Standards

4.1.2.1 Do not import honey for resale (importation for resale would require classification as a Processor/Exporter or Packer and the associated audit).

4.1.2.2 Meet the following requirements for the sale of Fully, Minimally and Non-Compliant loads of honey to Certified Packers, Processor/Exporters or Participating Importers.

Requirements for North American Beekeepers (Canada, Mexico and the United States)	
Fully Compliant Load:	Beekeeper registered with True Source
	Beekeeper must follow all applicable laws pertaining to the production, sale and/or export of honey. This may apply to both country of production and country of destination for direct exports. For example, Canadian beekeepers must meet all CFIA requirements, US beekeepers must meet all FDA requirements – including facility registration, and Mexican beekeepers must meet all SAGARPA
	Each load must be accompanied by a Bill of Lading (BOL) with Beekeeper and Purchasers name & address, drum count and weight. If the purchaser is a participating importer, the participating importer name & address must also appear on the BOL with the Beekeeper and Purchaser
Minimally Compliant Load:	Beekeeper must follow all applicable laws pertaining to the production, sale and/or export of honey. This may apply to both country of production and country of destination for direct exports. For example, Canadian beekeepers must meet all CFIA requirements, US beekeepers must meet all FDA requirements – including facility registration, and Mexican beekeepers must meet all SAGARPA
Minimally Compliant Load:	Each load must be accompanied by a Bill of Lading (BOL) with Beekeeper and Purchasers name & address, drum count and weight. If the purchaser is a participating importer, the participating importer name & address must also appear on the BOL with the Beekeeper and Purchaser.
Non-Compliant Load:	A load of honey not meeting the Minimally or Fully compliant requirements is non-compliant.

Table 4

- 4.1.2.3 Produce and sell honey in accordance with the FDA Food Safety Modernization Act of 2010.
- 4.1.2.4 In the event that a Beekeeper is selected to participate as part of a Packer Audit:
- a. They will be asked to confirm the volume of honey sold to the particular Packer participating in the audit. (Information shared is specific to only the participating Packer, not all Packers that the Beekeeper might conduct business with and is kept confidential between the audit firm, Packer and Beekeeper).
  - b. They will be asked to detail total production capacity: Hive numbers per location and totals, average annual production – capacity will be compared to volume transacted with participating Packer.
  - c. They will be asked to verify hive numbers and location by visiting several production yards or holding areas.
  - d. They will be asked to confirm that they have completed an FDA Food Facility Registration.
- 4.1.2.5 Canadian and Mexican Beekeepers who sell directly to Packers within the United States are subject to participation in an audit of a Packer to whom they have sold honey as described above in 4.1.2.4.
- 4.1.2.6 Canadian and Mexican Beekeepers who sell to Importers, who then sell directly to Packers within the United States are subject to participation in an audit of a Packer to whom an Importer has sold honey as described above in 4.1.2.4.
- 4.1.2.7 Canadian Beekeepers must meet all CFIA regulations when selling to a Processor/Exporter or Packer in order to be considered fully compliant.
- 4.1.2.8 Mexican Beekeepers must meet all SAGARPA requirements when selling to a Processor/Exporter or Packer in order to be considered fully compliant.

**4.1.3 Participate in Supplier Assessment section of a Packer Audit or Processor/Exporter (Indirectly)**

- 4.1.3.1 Beekeepers participate indirectly in certification as a part of the process of certifying Packers. During an audit, a Packer permits the auditor to inspect their records of purchase. From those purchase records a number of suppliers are selected at random for verification of purchase transactions. The auditor visits these randomly selected Beekeepers to make sure that they agree with the claims of the Packer and that the Beekeeper has a number of hives to support the volume of honey sold to the Packer or Processor/Exporter. This information is referenced in the checklist
- 4.1.3.2 Beekeepers participate indirectly in certification as a part of the process of certifying Processor/Exporters. During an audit, a Processor/Exporter permits the auditor to inspect their records of purchase. From those purchase records a number of suppliers are selected at random for verification of purchase transactions. The auditor visits these randomly selected Beekeepers to make sure that they agree with the claims of the Processor/Exporter and that the Beekeeper has a number of hives to support the volume of honey sold to the Processor/Exporter.

- 4.1.3.3 Under the model for True Source Certified® , Beekeepers are not certified because they do not participate in a complete audit, but may be randomly selected to participate in an audit being conducted with Packers or Processor/Exporters who purchase their honey.

## 4.2 Participation for Importers

**Importer:** A company that purchases honey from a Processor/Exporter and is responsible for (1) ensuring the imported goods comply with local laws and regulations, (2) filing a completed duty entry and associated documents and (3) paying the assessed import duties and other taxes on those goods and then selling the honey to Packers.

### 4.2.1 Register to Participate (Importers)

- 4.2.1.1 Complete a registration form ([www.tshmember.com](http://www.tshmember.com)) and submit the form and registration fee to True Source Honey.

Number of containers/truckloads imported into the US per year	Annual Fee
0 – 100	\$1,500.00
101-200	\$3,000.00
201-300	\$4,500.00
301-400	\$6,000.00
400+	\$7,500.00

Table 5

### 4.2.2 True Source Certified® Standards (Importers)

- 4.2.2.1 Understand the Phase-In requirements for Packers and the requirements for Fully Compliant, Minimally Compliant and Non-Compliant loads. See section 3.1.2.1.
- 4.2.2.2 Purchase Honey from Approved Countries for Certified Transactions (see section 2.3, Approved Countries).
- 4.2.2.3 True Source Certified® Identification Number: All documents must identify loads for shipment using the True Source Identification Number for High risk origins as well as Fully Compliant loads. (Minimally compliant loads do not require the use of the ID# - see section 3.1.2.1.).
- 4.2.2.4 Provide the following required documents for each load from a Processor/Exporter to Packer according to True Source Certified® Standards. (Section 6.2 Examples)

- a. **CBP Form 3461** showing: 0409.00 in box 24, Country of Origin in box 25 (must be the same as the one declared on the invoice to the Packer), Container no in box 29 (must match the number declared on the bill of lading and the invoice to the Packer )
- b. **Ocean/Bill of lading** copy showing: Place of receipt must be from the same country as the Processor/Exporter and the country of origin declared on the CBP form 3461, Shipper must be the Processor/Exporter, Consignee or Notify party must be the same as the seller to the Packer, True Source Honey ID# (see section 3.1.2.1), Exporter's lot number.
- c. **Analysis Report: *Pollen-geographical origin of honey (See Section 6 for Approved Laboratories)***  
For High risk origins, the audit firm must sample each load and confirm country of origin through a pollen analysis with an approved laboratory. A copy of the laboratory report, stating the country of origin, must be supplied to the Packer for each certified load. The True Source Certified® ID number assigned to that load must be the sample identification number stated on the laboratory report.
- d. **Country-Specific Export Documents:**
  - India – all shipments must include the local sampling report issued by the audit firm and the Export Inspection Consul (EIC) certificate for inspection.
  - Vietnam – all shipments must include Certificate of Origin form B.
- e. **Truck Bill of Lading:** Must indicate container number, True Source Honey ID#, Exporter lot number.
- f. **Delivery order:** If the container is delivered directly to the Packer, Importer must supply the delivery order showing the following information: container number, both seal numbers: container seal and audit firm seal (as applicable), True Source Honey ID#, Exporter's lot number.
- g. **Warehouse inbound receipt:** If the load is picked up by the Packer or delivery arranged by the seller to the Packer the following information must appear on the warehouse receipt: Container number, container and audit firm seal number (as applicable), True Source Honey ID#, Exporter's lot number.

4.2.2.5 Importer Certificate of Participation: Upon registration of an Importer, TSH will issue an "Importer Certificate of Participation."

## 5 Miscellaneous

### 5.1 Confidentiality and Non-Disclosure

- 5.1.1 No proprietary information of individual True Source Certified® participants shall be shared with True Source Honey, LLC or any of its members. Information concerning the number of containers/truckloads is provided to the independent third-party audit firm for certification and annual fee determination purposes.

- 5.1.2** The administrative third-party audit firm and each True Source Certified® participant shall sign a Confidentiality and Non-Disclosure Agreement to protect the confidential and proprietary nature of any information.

## **5.2 Complaints and Appeals**

A certified client may challenge audit findings to their third party audit firm. The third-party audit firm will establish a committee to review all facts prior to issuing a final determination.

## **5.3 Collective Trademarks and Logos**

### **5.3.1 Ownership and duration of use - True Source Certified® and True Source Honey Collective Trademarks and Logos**

- 5.3.1.1 Ownership of Collective Trademarks and the Collective Membership Trademark – the True Source Certified® and True Source Honey Collective Trademarks and logos are owned by True Source Honey, LLC. Member Companies obtain no property rights in these marks;
- 5.3.1.2 Duration of Collective Trademarks and Logos Use – Member Companies shall have the right to use the True Source Certified® and True Source Honey Collective Trademarks and the Collective Membership Trademark upon and for the duration of Participating Membership, as specified in the full Terms of Use documentation provided to Member Companies;
- 5.3.1.3 Direct any inquiries regarding the intended use of the True Source Certified® and/or True Source Honey Collective Trademarks and Logos to the Board of Directors of True Source Honey LLC, or their agents;
- 5.3.1.4 Discontinue any use of the True Source Certified® and/or True Source Honey Collective Trademarks and Logos to which TSH reasonably objects;
- 5.3.1.5 Operate entirely within the scope of its Membership. Subsidiary companies and site addresses not included in the Certificate of Membership are permitted to use the True Source Certified® and/or True Source Honey Collective Trademarks and Logos if the supplying packer is fully True Source Certified. Collective Trademarks and Logos may not be used if 1 or more supplying packers are not fully True Source Certified;
- 5.3.1.6 Provide TSH, and/or their agents reasonable access to examine the goods, products, packaging, containers, stationery, publicity material and all other such items bearing or indicating the True Source Certified® and/or True Source Honey Collective Trademarks and/or Logos for the purpose of confirming compliance with these rules; and
- 5.3.1.7 Payment within the specified time of any fees set by TSH or as otherwise agreed to by the parties.

### **5.3.2 Terms of Use - True Source Certified® Logo**

Full Terms of Use will be provided to True Source Certified® Participating members as applicable for each industry sector. This will include: Colors & Typography, Clear Space, Minimum Size, Proportionate Size, Artwork, and Ownership Terms. A current

and signed copy must be possessed by True Source Honey, LLC. before use or application of Collective Trademarks.

5.3.2.1 Introduction: The True Source Certified® logo is for use by True Source Certified® members only who have successfully completed a True Source Certified® audit.

5.3.2.1.1 We allow True Source Certified® Members to have access to our logo for the purpose of indicating their relationship with and successful participation in the True Source Certified® program.

5.3.2.1.2 The True Source Certified® logo must be used correctly to protect the integrity of the logo and the program.

5.3.2.1.3 Retail markets: True Source Certified® logo use for retail items (product for end-user consumption) is restricted to Certified member companies who have successfully completed a “Packer” audit.

The following guidelines must be strictly observed when using the True Source Certified® logo.

5.3.2.2 Logo Applications:

5.3.2.2.1 The True Source Certified® logo may only be applied to products which are 100% pure honey. Products which blend sweeteners, flavors or ingredients other than honey may not bear the True Source Certified® logo.

5.3.2.2.2 The True Source Certified® logo must not be used in any manner which reflects negatively on the True Source Certified® program, True Source Honey, LLC., or any members participating in said organizations.

5.3.2.2.3 The True Source Certified® logo may not be used in any manner which misrepresents the relationship of the authorized True Source Certified® member with the True Source Certified® program, True Source Honey, LLC., or any members participating in said organizations.

5.3.2.2.4 The artwork used in the application of the True Source Certified® logo must be supplied by True Source Honey, LLC. and follow the graphics Terms of Use as specified within this document (including product application, color, size and clear space guidelines). The color, font, size guidelines cannot be altered, combined with other graphics or words, animated, or proportionately changed.

5.3.2.3 Logo Specifications:

5.3.2.3.1 The True Source Certified® logo is for specific use by authorized True Source Certified® members to indicate their relationship with and successful participation in the True Source Certified® program. The logo should only be used on a member’s print or online creative, such as collateral evidence, labels, web sites, point of sale and other materials.

5.3.2.3.2 Translation or localization of the True Source Certified® logo is not allowed. The logos may be used in English only.

### **5.3.3 Terms of Use - True Source Honey Logo**

Full Terms of Use will be provided to True Source Certified® Participating members as applicable for each industry sector. This will include: Colors & Typography, Clear Space, Minimum Size, Proportionate Size, Artwork, and Ownership Terms. A current and signed copy must be possessed by True Source Honey, LLC. Before use or application of Collective Trademarks.

**5.3.3.1** Introduction: The TRUE SOURCE HONEY logo is for use by True Source Certified® participating members only who have successfully completed a True Source Certified® audit, and/or have fully registered with the True Source Honey, LLC. Organization.

**5.3.3.1.1** We allow True Source Certified® participating members to have access to our logo for the purpose of indicating their relationship with and successful participation in the True Source Certified® program.

**5.3.3.1.2** The True Source Honey logo must be used correctly to protect the integrity of the logo and the program.

**The following guidelines must be strictly observed when using the True Source Honey logo.**

**5.3.3.2** Logo Applications:

**5.3.3.2.1** The True Source Honey logo may not be applied to consumer products of any nature. Products which blend sweeteners, flavors or ingredients other than honey may not bear the True Source Honey logo.

**5.3.3.2.2** The True Source Honey logo must not be used in any manner which reflects negatively on the True Source Certified® program, True Source Honey, LLC., or any members participating in said organizations.

**5.3.3.2.3** The True Source Honey logo may not be used in any manner which misrepresents the relationship of the authorized True Source Certified® participating member with the True Source Certified® program, True Source Honey, LLC., or any members participating in said organizations.

**5.3.3.2.4** The True Source Honey logo may be used by Honey Industry Organizations for the exclusive purpose of promoting and supporting the True Source Honey, LLC. Organization and the True Source Certified® Program as deemed appropriate by written permission from True Source Honey, LLC..

**5.3.3.2.5** The artwork used in the application of the True Source Honey logo must be supplied by True Source Honey, LLC. and follow the graphics Terms of Use as specified within this document (including application, color, size and clear space guidelines). The color, font, size guidelines cannot be altered, combined with other graphics or words, animated, or proportionately changed.

**5.3.3.3** Logo Specifications:

**5.3.3.3.1** The True Source Honey logo is for specific use by authorized True Source Certified® participating members to indicate their relationship with and successful participation in

the True Source Certified® program. The logo should only be used on a member's print or online creative, such as collateral evidence, web sites, point of sale and other materials.

- 5.3.3.3.2 Translation or localization of the True Source Honey logo is not allowed. The logos may be used in English only.

#### **5.3.4 Suspension or Withdrawal of Trademark Use**

- 5.3.4.1 The permission for a Member Company to use the TSH Collective Trademarks and the Collective Membership Trademark will be suspended if such company's Membership is suspended; and/or withdrawn, or if the Member Company's Membership is terminated, relinquished or not renewed. Conditions for suspending or withdrawing a Member Company's permission to use the TSH Collective Trademarks and the Collective Membership Trademark, include (but are not necessarily limited to):
- a. Suspension if the Member Company breaches or fails to comply with these rules;
  - b. Withdrawal if the Member Company uses the TSH Collective Trademarks and the Collective Membership Trademark in a way that, in the opinion of TSH is detrimental to the TSH Collective Trademarks and the Collective Membership Trademark or TSH as a whole, is misleading to the public or otherwise contrary to law; or
- 5.3.4.2 Withdrawal if the Member Company has an administrator, receiver, receiver and manager, official manager or provisional liquidator appointed over its assets or where an order is made or a resolution passed for the winding up of the Member Company (except for the purpose of amalgamation or reconstruction) or the Member Company ceases to carry on its business or becomes bankrupt, applies to take the benefit of any law for the relief of bankrupt or insolvent debtors or makes any arrangement of composition with its creditors.
- 5.3.4.3 Upon termination of a Member Company's membership the Member Company must stop using the TSH Collective Trademarks and the Collective Membership Trademark for the duration of the suspension and must at its own expense isolate all goods, products, packaging, containers, stationery, publicity material and all other such items bearing or indicating the TSH Collective Trademarks and the Collective Membership Trademark during such period of suspension.
- 5.3.4.4 Upon termination of a Member Company's Membership, any goods, products, packaging, containers, stationery, publicity materials and all other such items bearing or indicating the TSH Collective Trademarks and the Collective Membership Trademark shall, at the Member Company's expense, be destroyed or disposed of, or be treated to have the TSH Collective Trademarks and the Collective Membership Trademark obliterated. The Member Company must also return to TSH or its agents the Collective Trademarks and the Collective Membership Trademark and computer media containing the TSH Collective Trademarks and the Collective Membership Trademark.
- 5.3.4.5 Upon withdrawal or during any period of suspension of a Member Company's Membership, the Member Company shall not, without the consent of TSH, sell, or expose for sale, any goods, products, or services bearing the TSH Collective Trademarks.

### **5.3.5 Right of Appeal – Participating Member Company**

- 5.3.5.1 TSH shall give Member Company written notice of its decision to suspend or withdraw the Member Company's Membership and shall provide together with such notice a copy of its appeals procedures.
- 5.3.5.2 A Member Company may appeal against a decision to suspend or withdraw its Membership. Written notice of an appeal must be received by TSH within 14 days of the date of the written notice of suspension or withdrawal and must set the grounds upon which the appeal is based.
- 5.3.5.3 After receiving the notice of appeal, TSH must either:
- 5.3.5.4 Give notice to the Member Company that it has reversed in decision to suspend or withdraw the Member Company's Membership; or
- 5.3.5.5 Refer the appeal to independent adjudication or arbitration in accordance with its appeal procedures.

### **5.3.6 Notices and Register – Participating Member Company**

- 5.3.6.1 Notices – any notice or other communication to be given or sent to TSH or the Member Company shall be deemed to be duly given or sent by pre-paid post, e-mail or facsimile transmission to the last known address of the party concerned.
- 5.3.6.2 Register – TSH shall keep a register at its offices containing the names, addresses and main business activity of Member Companies and a description of goods and services in relation to which the Member Companies are authorized to use the TSH Collective Trademarks and the Collective Membership Trademark, together with the date of Membership of the Member Companies and particulars of any withdrawals or suspensions of the Member Companies' rights.

### **5.3.7 Right of Appeal – Certified Company**

- 5.3.7.1 TSH or the Licensed Certification Entity shall give Certified Company written notice of its decision to suspend or withdraw the Certified Company's certification and shall provide together with such notice a copy of its appeals procedures.
- 5.3.7.2 A Certified Company may appeal against a decision to suspend or withdraw its certification. Written notice of an appeal must be received by TSH or the Licensed Certification Entity within 14 days of the date of the written notice of suspension or withdrawal and must set the grounds upon which the appeal is based.
- 5.3.7.3 After receiving the notice of appeal, TSH or the Licensed Certification Entity must either:
  - a. Give notice to the Certified Company that it has reversed in decision to suspend or withdraw the Certified Company's certification; or
  - b. Refer the appeal to independent adjudication or arbitration in accordance with its appeal procedures.

### **5.3.8 Notices and Register – Certified Company**

- 5.3.8.1 Notices – any notice or other communication to be given or sent to TSH or the Certified Company shall be deemed to be duly given or sent by pre-paid post, e-mail or facsimile transmission to the last known address of the party concerned.
- 5.3.8.2 Register – the Licensed Certification Entity shall keep a register at its offices containing the names, addresses and main business activity of Certified Companies and a description of goods and services in relation to which the Certified Companies are authorized to use the TSH Certification Trademarks, together with the date of registration of the Certified Companies and particulars of any withdrawals or suspensions of the Certified Companies' rights.

### **5.3.9 Amendment of Rules of Use**

- 5.3.9.1 TSH may from time to time alter these rules or make new rules, but no such alteration or new rules shall effect the use of the TSH Collective Trademarks and the Collective Membership Trademark by a Member Company until three months have expired from the date of alteration or new rules are first published by TSH in a publication or on an internet website maintained by TSH.

## **5.4 Financial Audit Criteria – High Risk Countries**

### **5.4.1 India**

- 5.4.1.1 Grant Thornton (GT) has been exclusively nominated by True Source Honey, LLC (TSH) for the purpose of conducting Financial Audit (Audit) for companies interested in applying for TSH certification in India.
- 5.4.1.2 The purpose of the Audit is to determine that only honey of Indian origin is exported as “Product of India” to the United States.
- 5.4.1.3 GT will conduct the Audit for the interested companies on behalf and as per the guidelines of TSH. However, the audit fees are to be borne by the individual companies. TSH will neither guarantee nor be responsible for any fee or related payments. The fees will be negotiated directly on a case by case basis between GT and the individual company.
- 5.4.1.4 GT will conduct the Audit for the sole purpose of establishing origin of honey exported by the Exporter.  
\* The importation of honey for processing, handling or export is prohibited under True Source Certified® Standard as seen in 3.2.2.1.
- 5.4.1.5 GT will conduct rigorous check on the company's financial accounts, books and records to determine if any duty free import from any origin has been done by the Exporter for the purpose of re-export to any origin. The check will be conducted regardless of whether the Exporter has declared this product only as “Product of India” or whether there is a mention of import on the export documents.

- 5.4.1.6 GT will also consider imports from countries where India has a duty-free bilateral trade agreement/ SAARC countries. These may also be treated as imported honey.
- 5.4.1.7 The term “Import for the Purpose of re-export” would broadly cover any re-export, whether the imported product is re-exported as it is/ re-packed / or blended with Indian honey in any ratio.
- 5.4.1.8 GT will determine the exact nature and manner of duty free import – through Import License/ Import Bond/ EOU/ EPZ / SEZ etc.
- 5.4.1.9 In case of imports by EOU/ EPZ/ SEZ companies, the burden is on the applicant to convince GT that the honey imported by them was for domestic use after paying the prevalent duties. If this burden is not met, the same may be treated as import for purpose of re-export.
- 5.4.1.10 GT will determine the exact volume and amount of duty free honey imported and how the import obligation was completed. Whether any duty was paid on the said imported honey and if some quantities were sold in the domestic tariff area after paying prevalent duties. Honey sold in the DTA after payment of duties maybe exempt from the category of “Re-exported honey.”
- 5.4.1.11 GT will conduct a complete audit for past two (2) calendar years from the date of application to TSH for the above.
- 5.4.1.12 GT will only determine whether the applicant has been in the business of re-exporting honey from India as “Indian Origin” from India during the above mentioned period.
- 5.4.1.13 GT may access all relevant information for the purpose of carrying out their Audit, however no financial data shall be disclosed to TSH.
- 5.4.1.14 GT will work in close coordination with NSF who is the third party Traceability Auditor for TSH.
- 5.4.1.15 GT will only certify to NSF whether the applicant company is PASS/ FAIL as per above checklist and the reason thereof. All financial findings/data are to be maintained confidential and not shared with anyone including Intertek and TSH.
- 5.4.1.16 GT may use the services of any of their departments for the above-mentioned Audit – Tax/ Assurance/ Advisory, etc.
- 5.4.1.17 All associated/ related companies of the Exporter engaged in similar/ same business to be covered in the Audit.

## **6 Additional Information**

### **6.1 Approved Pollen Analysis Laboratories**

#### **6.1.1 Intertek/Applica:**

Intertek Food Services GmbH  
Olof-Palme-Str. 8, 28719 Bremen  
Germany Tel: +49 (0) 421 65 727 1 Fax: +49 (0) 421 65 727 222  
[applica@intertek.com](mailto:applica@intertek.com), [www.intertek.de](http://www.intertek.de)

Pollen analysis 1 - Determination of geographical origin: Qualitative pollen spectrum analysis, solid components (honeydew elements and other), electrical conductivity, sensory analysis, yeasts (estimated) and starches. Lab Code: 101291

**6.1.2 Quality Services International GmbH:**

Flughafendamm 9a, 28199 Bremen Germany  
Phone: +49 - (0)421 - 59 47 70, Fax: +49 - (0)421 - 59 47 71  
e-mail: [info@qsi-q3.de](mailto:info@qsi-q3.de) , web: [www.qsi-q3.de](http://www.qsi-q3.de)  
Code 250: Pollen Analysis, Botanical and Geographical Origin, IUBS 1978, compliance with international rules e.g. Codex, IHC

**6.1.3 General Laboratories**

Additional laboratories may submit a request for approval to the True Source Honey board of directors. Upon demonstration of ability and approval by the board, they may be granted status as an approved laboratory.

**6.1.4 Transfer of Authorization for Certification and Use of the Mark**

Upon request and with documentation of continued Conformance with all applicable NSF Ag requirements, and after the new Company's execution of the Contract along with payment of any outstanding fees, NSF Consumer Values Verified may transfer authorization for continued Certification of a specific Site to another Organization as a result of name change, change of ownership, or change of a production and/or service location. An Additional Audit at the applicant's expense may be required. A Site visit may be necessary if there is a change in location, business or quality management".

## 6.2 Examples of Required Documentation

### 6.2.1 Customs Form CBP 3461

U.S. DEPARTMENT OF HOMELAND SECURITY Bureau of Customs and Border Protection				Form Approved OMB No. 1651-0024	
<b>ENTRY/IMMEDIATE DELIVERY</b>				0071	108388904
				PAPERLESS	
				MFST HOLD AGR	
				ABI CERTIFIED	
				FDA MAY PROCEED	
19 CFR 142.3, 142.16, 142.22, 142.24					
1. ARRIVAL DATE 083010	2. ELECTED ENTRY DATE 083010	3. ENTRY TYPE CODE/NAME 03	4. ENTRY NUMBER		
5. PORT 1101	6. SINGLE TRANS. BOND	7. BROKER/IMPORTER FILE NUMBER			
8. CONSIGNEE NUMBER		9. IMPORTER NUMBER			
10. ULTIMATE CONSIGNEE NAME <b>PACKER'S NAME OR IMPORTER'S NAME</b>		11. IMPORTER OF RECORD NAME <b>IMPORTER'S NAME (SAME AS COMPANY SELLING TO PACKER)</b>			
12. CARRIER CODE CPLB	13. VOYAGE/FLIGHT/TRIP 011N	14. LOCATION OF GOODS-CODE(S)/NAME(S) C095 PACKER AVE CONTAINERS			
15. VESSEL CODE/NAME CAP NORTE					
16. U.S. PORT OF UNLADING 1101	17. MANIFEST NUMBER	18. G.O. NUMBER	19. TOTAL VALUE		
20. DESCRIPTION OF MERCHANDISE					
21. U.S. PORT OF ORIGIN M	22. IT/BL/AWB NO.	23. MANIFEST QUANTITY	24. H.S. NUMBER 0409.00 0044	25. COUNTRY OF ORIGIN VN	26. MANUFACTURER NO.
H					
			<b>MAKE SURE IT WAS CUSTOM CLEARED AS HONEY</b>		
			<b>COUNTRY OF ORIGIN MUST BE THE SAME AS THE ONE DECLARED ON COMMERCIAL INVOICE TO PACKER</b>		
27. CERTIFICATION			28. C		
I hereby make application for entry/immediate delivery. I certify that the above information is accurate, the bond is sufficient, valid, and current, and that all requirements of 19 CFR Part 142 have been met.			<input type="checkbox"/> OTHER AGENCY ACTION F		
SIGNATURE OF APPLICANT <b>X</b>			<input type="checkbox"/> CBP EXAMINATION REQUIRED.		
PHONE NO. DATE 082610 02:14			<input type="checkbox"/> ENTRY REJECTED, BECAUSE:		
29. BROKER OR OTHER GOVT. AGENCY USE					
EXAM SITE: ASSOCIATES CONTAINER NUMBER(S): <b>TRLU123456</b>			DELIVERY AUTHORIZED: SIGNATURE DATE		
			ELECTRONIC ENTRY -- PORT OF PHILADELPHIA, PA 95		
			I CERTIFY THAT THIS CARGO HAS BEEN AUTHORIZED FOR DELIVERY BY U.S. CUSTOMS.		
			DATE		

Paperwork Reduction Act Notice: This information is to determine the admissibility of imports into the United States and to provide the necessary information for the examination of the cargo and to establish the liability for payment of duties and taxes. Your response is necessary. The estimated average burden associated with this collection of information is 15 minutes per respondent depending on individual circumstances. Comments concerning the accuracy of this burden estimate and suggestions for reducing this burden should be directed to Bureau of Customs and Border Protection, Information Services Branch, Washington, DC 20229, and to the Office of Management and Budget, Paperwork Reduction Project (1651-0024), Washington, DC 20503.

CBP Form 3461 (01/89)

## 6.2.2 Ocean Bill of Lading

Consignor/Shipper		<b>OCEAN BILL OF LADING</b>		
<b>PROCESSOR/EXPORTER</b>		 <b>S.S LINE CIE</b>		
Consigned to order of  <b>TO ORDER OR IMPORTER'S NAME</b>				
Notify address  <b>IMPORTER'S NAME IF OCEAN BILL OF LADING MADE TO ORDER</b>				
Place of receipt <b>HOCHIMINH CITY</b>				
Ocean vessel Port of loading <b>HOCHIMINH CITY</b>				
Port of discharge <b>HOUSTON</b>		<b>PLACE OF RECEIPT AND PORT OF LOADING MUST BE IN THE COUNTRY OF ORIGIN OF THE HONEY</b>		
Place of delivery <b>HOUSTON</b>				
Marks and numbers	Number and kind of packages	Description of goods	Gross weight	Measurement
<div style="border: 1px solid black; display: inline-block; padding: 2px 5px;"><b>TRLU123456</b></div> <b>SEAL : 00824</b>	<b>65 DRUMS</b>	<b>VIETNAMESE HONEY</b>  Processor/Exporte Lot#: <div style="background-color: yellow; display: inline-block; padding: 2px 5px; margin-top: 5px;"><b>TRUE SOURCE ID # : XXXX</b></div> <b>(SEAL #)</b>		
<div style="font-size: 2em; opacity: 0.5; transform: rotate(-15deg); display: inline-block;">ORIGINAL</div>				
according to the declaration of the consignor				
Declaration of interest of the consignor in timely delivery (Clause 6.2) <div style="border: 1px solid black; height: 20px; width: 100%; margin-top: 5px;"></div>		Declared value for ad valorem rate according to the declaration of the consignor (Clauses 7 and 8). <div style="border: 1px solid black; height: 20px; width: 100%; margin-top: 5px;"></div>		
The goods and instructions are accepted and dealt with subject to the Standard Conditions printed overleaf.  Taken in charge in apparent good order and condition, unless otherwise noted herein, at the place of receipt for transport and delivery as mentioned above. One of these Multimodal Transport Bills of Lading must be surrendered duly endorsed in exchange for the goods. In Witness whereof the original Multimodal Transport Bills of Lading all of this tenor and date have been signed in the number stated below, one of which being accomplished the other(s) to be void.				
Freight amount <b>USD AS PER AGREEMENT</b>		Freight payable at <b>ORIGIN</b>		Place and date of issue
Cargo insurance through the undersigned <input checked="" type="checkbox"/> Not covered <input type="checkbox"/> Covered according to attached Policy		Number of Original BL's <b>THREE</b>		Stamp and signature
For delivery of goods please apply to:				
AS AGENT				

## 6.2.3 Lab Report

**Intertek**

**ANALYSIS REPORT No. 110218334**

**DATE: 18.02.2011**

**PAGE 1/2**

Client: **CERTIFIED PROCESSOR/EXPORTER**  
**NAME**  
**ADDRESS**



**FAX:**  
**E-Mail:**

Our reference no.	: PI110214118		
Product	: Honey		
Sample description / Batch	: CERTIFIED TRUE SOURCE ID #		
Sample received on / transported by	: 14.02.2011 via courier	Seal	: seal no. 018617
Sample temp. when received / stored	: Room temperature	Sampling by	<b>INTERTEK</b>
Packaging / Quantity	: plastic vessel / approx. 200g	Start / End of analysis	: 15.02.2011 / 18.02.2011

**ANALYSIS REQUESTED: Pollen - geographical origin of honey**

Pollen by Microscopy: DIN 10760 (a)

Classification	Rel. content [%]	Pollen type
Main pollen (>45%)	n.a.	
Accompanying pollen (>15%)	n.a.	
Significant isolated pollen (≥ 3%)	n.a.	

Yeast content - estimated

slightly increased (<500.000/10g)

Starch (referring to pollen content):  
 (inhouse procedure 3110.037) (a)

very low (< 5%)

Organoleptic Analysis: (a)

Colour:

light

Consistency:

liquid

Odour:

typical for honey

Taste:

sweet, caramellike, herbal

Sediment: (a)

Honeydew elements:

crystalline matter

Others

vegetable fibres

Electr. conductivity:

0.23 mS/cm

(inhouse procedure 3110.042) (a)


Pollen spectrum qualitative:
**Isolated pollen - group resp. pollen type (botanical description)**

Chenopodiaceae	Chenopodiaceae
Compositae	Compositae
Cruciferae	Cruciferae
Gramineae	Gramineae
Leguminosae	Trifolium pratense-T
	Vicia-T
Mimosaceae	Leucaena-T
Myrtaceae	Eucalyptus-T
Palmae	Palmae
Pedaliaceae	Sesamum
Rosaceae	Rubus-T
Umbelliferae	Coriandrum
	Umbelliferae

(a) : accredited method. (na) : not accredited method.

T = Type, n.d. = not detected, n.d.(Starch) = &lt;1%, n.a. = not analysed

This document may only be reproduced in full. The results given herein apply to the submitted sample only.



**Interpretation:**

Judging from the analysed pollen-spectrum, there are no objections to indicating "country of origin" as the regional origin. Therefore, the declaration "country of origin" as the regional origin is permissible (Council Directive 2001/110/EC dated 20/12/2001 in combination with literature).





Katja Bohm  
Staatl. gepr. Lebensmittelchemikerin / Prüffleiterin

## 6.2.4 Export Inspection Consul Certificate for Inspection (India)

CERTIFICATE FOR INSPECTION				
1. Name and Address of the Exporter  <b>IE CODE: 0288014910</b>		4. Buyer's Order No. & Date PURCHASE CONTRACT NO. <b>1234</b>		5. VALID FOR CUSTOMS
2. Name and Address of the Approved Processing Plant		6. Invoice No. & Date <b>1234/2010-2011 03.03.2011</b>		7. Country of Destination <b>USA</b>
3. Details of stamp on export packages   Approval No. <b>HONEY -04-008</b>		8. Certificate No. <b>456789</b>  Valid Upto and including <b>16-Apr-11</b>		
9. Specification Reference <b>As per buyer's specification.</b>				
10. Shipping Marks	11. No. and kind of Pkgs.	12. Description of Goods	13. Quantity	14. FOB value
PURCHASE CONTRACT NO.  BN126K1 TO BN126K186 300.000 KGS. WHITE HONEY PRODUCT OF INDIA  <b>True Source Certified ID # 000000 ID # 123456 ID # 654321</b>	<b>True Source Certified ID # 000000 ID # 123456 ID # 654321</b>  TOTAL 186 DRUMS PACKED	NATURAL HONEY  PURE UNADULTERATED BEES HONEY-ORIGIN INDIA  -PACKED IN FOOD GRADE EPOXY COATED M.S. DRUMS	55.800 MT	INR 7335152.00
<p>15. DECLARATION</p> <p>The undersigned hereby declares:</p> <p>(i) that the above consignment has been processed in our processing plant which has valid approval and is under continuous monitoring by Export Inspection Agency under the Export of Honey (Quality Control, Inspection &amp; Monitoring) Rules, 2002.</p> <p>(ii) that the consignment is exportworthy.</p> <p style="text-align: center;">   <b>EIA- DELHI</b> </p> <p style="text-align: center;">And</p> <p style="text-align: right;">         _____          (Signature)          _____          (Name)  <b>QUALITY INCHARGE</b>          (Designation)       </p> <p>Place ..... Date <b>3-Mar-11</b></p>				

## 6.2.5 Certificate of Origin Form B (Vietnam)

1. Goods consigned from (Exporter's business name, address, country) <b>Processor/Exporter</b> Name: Address:		Reference No. <b>16230441</b>	
2. Goods consigned to (Consignee's name, address, country) <b>Importer</b> Name: Address:		<b>CERTIFICATE OF ORIGIN</b> <i>(Combined declaration and certificate)</i> <b>FORM B</b> Issued in Vietnam	
3. Means of transport and route (as far as known) Vessels: BUXLAGOON V.81113R B/L No: PFSPI 140090 Date: April 02, 2011 Port of loading: HOCHIMINH CITY, VIETNAM Port of discharge: PHILADELPHIA, USA Place of Delivery: PHILADELPHIA, USA		4. Competent authority (name, address, country) CHAMBER OF COMMERCE & INDUSTRY OF VIETNAM HO CHI MINH CITY BRANCH 171 Vo Thi Sau Str., 3 <sup>rd</sup> Dist, Ho Chi Minh City, Vietnam Tel: 84.8.9326498, 84.8.9325989, 84.8.9326598 Fax: 84.8.9325472 Email: vcci-hcm@hcm.vnn.vn	
6. Marks, numbers and kind of packages; description of goods <b>PURE UNADULTERATED BEES HONEY- ORIGIN VIETNAM</b>  MARKING: BEES HONEY FROM VIETNAM LOT NUMBER: TH.14 DRUM NUMBER:  NW: 300KGS/DRUM GW: 317KGS/DRUM TARE: 17KGS COLOR: LIGHT AMBER ODEM10030/PO #4913/1  CONTRACT NO(S): PC 4913  CONTAINER NO / SEAL NO:  CUSTOMS DECLARATION FOR EXPORT COMMODITIES NO.: 23422/XKD01 DATE: March 30, 2011  SHIPPER'S FDA REGISTRATION NUMBER:		7. Gross weight or other quantity  N.W: 39,000.00 KGS G.W: 41,210.00 KGS  130 DRUMS	
9. Certification It is hereby certified, on the basis of control carried out, that the declaration by the exporter is correct.		8. Number and date of invoices  No.  Dated: March 30, 2011.	
10. Declaration by the exporter The undersigned hereby declares that the above details and statements are correct; that all the goods were produced in Vietnam and that they comply with the origin requirements specified for goods exported to the USA 		10. Declaration by the exporter The undersigned hereby declares that the above details and statements are correct; that all the goods were produced in Vietnam and that they comply with the origin requirements specified for goods exported to the USA 	

## 6.2.6 Truck Bill of Lading

STRAIGHT BILL OF LADING - SHORT FORM NOT - NEGOTIABLE			
CARRIER:		BILL OF LADING NUMBER:	
DATE:		CONSIGNEE:  PACKER	
CONSIGNOR (SHIPPER)  IMPORTER			
SPECIAL INSTRUCTIONS:		PO#	
		ORDER#	
ITEM CODE:	DESCRIPTION	QNTY.	WEIGHT
	CONTAINER NUMBER # OF DRUMS HONEY (ORIGIN) PROCESSOR/EXPORTER LOT # <div style="background-color: yellow; padding: 2px; margin-top: 5px;">TRUE SOURCE ID #</div>		
	TOTAL		
NUMBER OF PALLETS:      REGULAR <input type="text"/> CHEP <input type="text"/> CPC <input type="text"/>			
DECLARED VALUE    \$ <input style="width: 100px;" type="text"/> <small>MAXIMUM LIABILITY OF \$4.41 PER KILOGRAM (\$2.00 PER POUND) UNLESS STATED OTHERWISE</small>		TERMS:    PREPAID <input type="text"/> COLLECT <input type="text"/> OTHER <input type="text"/>	
SHIPPER: PICK UP DATE <input style="width: 100px;" type="text"/> SIGNATURE <input style="width: 100px;" type="text"/> PRINT <input style="width: 100px;" type="text"/> <small>THIS IS TO CERTIFY THAT THE ABOVE MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED AND LABELED AND ARE IN PROPER CONDITION FOR TRANSPORTATION, ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION</small>		CARRIER:      PICK UP DATE <input style="width: 100px;" type="text"/> SIGNATURE <input style="width: 100px;" type="text"/> PRINT <input style="width: 100px;" type="text"/> <small>CARRIER ACKNOWLEDGES RECEIPT OF PACKAGES, AND THAT THEY ARE PROPERLY DESCRIBED AS ABOVE AND ARE IN GOOD ORDER EXCEPT AS NOTED</small>	
<b>RECEIVED IN APPARENT GOOD ORDER</b>			
RECEIVER SIGNATURE: <input style="width: 150px;" type="text"/> PRINT NAME: <input style="width: 150px;" type="text"/> DATE: <input style="width: 100px;" type="text"/>			
<div style="border: 1px solid black; display: inline-block; padding: 2px 10px;">RECEIPT OF GOODS AT DESTINATION</div>			



## 6.2.8 Warehouse Inbound Receipt

# INBOUND WAREHOUSE RECEIPT

### NOTICE OF RECEIPT

TO: **IMPORTER**

MANIFEST:  
YOUR REF:  
DATE:  
SEAL: 00824

SUPPLIER:  
CARRIER:

CONTAINER: **TRLU123456**

SEQ	ITEM NO	REFERENCE	DESCRIPTION	EXCEPTIONS	PIECES	PALLETS
---	-----	-----	-----	-----	-----	-----

65 DRUMS VIETNAMESE HONEY

Processor/Exporter Lot #:

**TRUE SOURCE ID # : XXXX**

(SEAL #)

IN CASE THE PACKER PICKS-UP THE LOAD AT A WAREHOUSE,  
THE WAREHOUSE RECEIPT IS REQUIRED

IF THE LOAD IS DELIVERED TO THE PACKER THE TRUCKING BILL OF LADING  
REQUIRES THE SAME INFORMATION AS THE INBOUND WAREHOUSE RECEIPT  
EXCEPT FOR THE CONTAINER SEAL #