http://www.tshmember.com/index.html

True Source Certified® Standards **V7.2**

**Revision Date: March 16, 2023**

*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 and authenticity for those participants in an international supply chain who wish to demonstrate through an independent 3rd 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 3rd 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 audits are purely individual in nature – involving only the audit firm and the client, True Source 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 authentic 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 and standard authenticity testing practices.

Therefore, True Source Honey, LLC has developed the True Source Certified voluntary system of traceability and authenticity for those participants who wish to demonstrate through an independent 3rd party that their sourcing practices are in full compliance with requirements of the True Source Certified Standard. 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 3rd party audit firm that trading partners can demonstrate compliance with requirements of the True Source Certified Standard.

### LEGAL DISCLAIMER

**PLEASE BE ADVISED THAT TRUE SOURCE HONEY, LLC DOES NOT AUDIT ANY LABEL CLAIMS OF ANY PARTICIPANT AND DOES NOT CERTIFY HONEY AS PESTICIDE FREE. THE AUDITS THAT ARE CONDUCTED ON BEHALF OF TRUE SOURCE HONEY, LLC ARE SOLELY FOR THE USE BY AND BENEFIT OF TRUE SOURCE HONEY, LLC IN ORDER TO OBSERVE THE ACTIVITIES, PROCEDURES, AND BUSINESS PRACTICES OF THE PARTICIPANT AT THE TIME OF THE AUDIT AND ARE NOT DESIGNED TO PROVIDE A GUARANTEE OR ASSURANCE AGAINST ANY ACTIVITIES, PRACTICES, PROCEDURES OR BEHAVIORS THAT MAY TAKE PLACE BETWEEN ANY SUCH AUDITS. ANY AND ALL LABEL CLAIMS ARE THE SOLE RESPONSIBILITY OF THE ENTITY PACKING AND/OR SELLING THE PRODUCT.**

| Table 1: Participants and their responsibilities | |
|---|---|
| **Participant** | **Responsibility** |
| **True Source Honey** | Establish and maintain the standards for certification |
| **3rd Party Audit Firm** | Conduct audits to evaluate compliance to the Standards |
| | For each load originating in a High-Risk Country, to provide oversight for container loading and random sampling of Honey drums. Assign, seal, and record the True Source Certified Seal Number. |
| **Beekeepers** | Produce and sell authentic honey directly from their own operation |
| **Processors/Exporters** | Purchase honey only produced from within their country of operation for resale/export |
| | Maintain a system of traceability and use a True Source Certified Seal Number for every load of honey. |
| | Maintain a system to ensure honey authenticity (i.e. freedom from sugar/syrup adulteration) |
| **Importers** | Follow True Source Certified Standards when purchasing and selling certified loads of honey |
| | Provide status change of uncertified load to non-True Source Certified Packers |
| | Maintain a system of traceability and use the True Source Certified Seal Number for every load of honey |
| | Provide the required documentation to Packers related to the import of each load |
| **Packers/Brand Purchasers** | Follow the True Source Standards when purchasing certified loads of honey from certified participants |
| | Maintain a system of traceability and use the True Source Certified Seal Number for every load of honey excluding shipments from Canada, Mexico and the United States sources. |
| | Maintain a system to ensure honey authenticity (i.e. freedom from sugar/syrup adulteration) |
| **Co-Packers/Re-Packers** | Maintain a system of traceability. |
| | Maintain a system to ensure honey authenticity (i.e. freedom from sugar/syrup adulteration) |

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| **1** | | **Background** |
| | 1.1 | Food safety is entirely dependent upon traceability and clear identification of the origins of food products entered into the United States. Without proper declaration of country of origin, the task of assuring food safety becomes increasingly difficult and uncertain.<br><br>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, 3rd party audited, authentic 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.<br><br>The True Source Certified system combines 3rd party audits, random product sampling, and oversight of container shipments in "High-Risk" countries to identify and discourage potential transshipment schemes. While True Source Certified applies to all participants in the supply chain, from Beekeepers, to Processor/Exporters, Importers, Packers/Brand Purchasers and Co-Packers/Re-Packers – there are two critical areas of focus, the Processor/Exporter and the Packer/Re-Packer. In order to provide traceability, participants must adhere to all of the elements of the standard. These include proper documentation, the use of the True Source Certified system of identification, and in some countries, the use of 3rd party auditors to sample and seal loads in the country of origin prior to shipment. |
| **2** | | **True Source Certified Framework** |
| | **2.1** | **Governing Body** |
| | | True Source Honey, LLC (TSH), and thus True Source Certified, are governed by an eleven member voting 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 registered members (Beekeepers, Processor/Exporters, Importers, and Packers.) 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 Definition** |
| | | **3rd 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. |
| | | **3rd 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. |
| | A. | **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 Annual Audit**: An annual scheduled Annual audit for Packers/Brand Purchasers, Co-Packers/Re-Packer and Processor/Exporters. |
| | | **Annual Audit**: Once a company achieves certification, they will be subject to an annual announced or unannounced Annual audit. An Annual 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. |
| | | **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. |
| | | **Authentic/Authenticity:** Free from sugar/syrup adulteration as determined by EA/LC-IRMS, HMRS, or other advanced detection methods as conducted by a qualified laboratory using accredited |

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| | | methods. While a single failed test may be sufficient to determine adulteration, no single method is sufficient to detect all types of adulteration. The recommended best practice is to conduct a panel of risk-based testing suitable to detect adulteration types common to each origin. |
| | B. | **Beekeeper:** Primary producer with direct ownership or control of honey production (bee hives). |
| | | **Brand Purchaser:** A company in North America that is involved in the purchase and ownership of honey, and contracts with True Source Certified Co-Packer(s) for the preparation and packaging of honey for the retail, wholesale, or bulk ingredient market. To use the True Source Certified trademarks and logos on products, the Brand Purchaser must successfully participate in a True Source Certified audit and utilize True Source Certified Packers. Brand Purchaser is equal to a Packer for Standard requirements. |
| | | **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. |
| | C. | **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 Honey, LLC. Certificates shall be valid for 1 year from the date of issue provided that all Annual Audits and any random Surveillance Inspections are successfully completed as scheduled by the audit firm. |
| | | **Certificate of Participation:** Certificate in a format provided by True Source Honey, LLC 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" and the logo depicted in True Source "Terms of Use". |
| | | **Certification:** Confirmation by the 3rd party Audit Firm of the compliance to the True Source Certified Standards by Packers and Processor/Exporters. |
| | | **Certified Company:** Packer/Brand Purchaser located in North America or Processor/Exporter who has successfully completed a Certification Audit and certification has been granted. True Source Certification can only be held by the entity actively purchasing and processing honey in the country of origin. Associated third parties cannot be covered in the scope of the certification. Brand Purchaser is equal to a Packer for Standard requirements. |
| | | **Certified Co-Packer**: A Certified Company which packages product for another honey company without direct ownership of the product. No certificate will be granted to an uncertified honey company that has not directly participated and successfully passed a full True Source Certified Co-Packer/Re-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 honey companies of the logo-bearing product. Honey must not be mixed with any other food product. If honey is mixed with other products and is not 100% honey, Made with True Source Certification is required. |
| | | **Certified Re-Packer**: A Certified Company which re-packages product purchased from a True Source Certified Packer. No certificate will be granted to an uncertified honey company that has not directly participated and successfully passed a full True Source Certified Co-Packer/Re-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 honey companies of the logo-bearing product. Honey must not be mixed with any other food product. If honey is mixed with other products and is not 100% honey, Made with True Source Certification is required. Re-Packer is equal to a Co-Packer for Standard requirements. |
| | | **Certified Load:** One full ocean container load (FCL) or one full truckload (FTL) that meets the True Source Certified Standards and has been assigned a True Source Seal #. One load is approximately |

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| | | 42,500 lb. or 19,400 kg of honey. Loads may transfer from one party to another provided that the original True Source seal remains intact, and the documentation clearly shows the chain of custody from certified Exporter to certified North American recipient. |
| | | **Collector/Collection Center:** A collector is an independent entity that purchases honey directly from Beekeepers and then re-sells that honey to Exporters. A collector is considered a separate business entity and would be subject to inspection and audit during the course of an Exporter audit. An employed agent of the Exporter who simply transfers honey from the Beekeepers to the Exporter is not considered a collector. |
| | | **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 Co-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. |
| | E. | **EA/LC-IRMS:** The technique used is 13C EA/LC IRMS (isotope ratio mass spectrometry). Determination of Delta 13C protein, Delta 13C honey, Delta 13C fructose, Delta 13C glucose, Delta 13C disaccharides, Delta 13C trisaccharide's and Delta 13C oligosaccharides. Deviation of the measured isotopic values larger than the specified purity criteria for authentic honeys indicate adulteration. |
| | | **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. |
| | | **EIC:** The Export Inspection Council (EIC) is the official export – Certification body of India which ensures quality and safety of products exported from India. The EIC was set up by the Government of India under Section 3 of the Export (Quality Control and Inspection) Act, 1963 to ensure sound development of export trade of India through quality control and inspection and matters connected therewith. The role of EIC is to ensure that products notified under the Export (Quality Control and Inspection) Act 1963 are meeting the requirements of the importing countries in respect of their quality and safety. |
| | F. | **Falsification of Records:** Any falsification of records is considered a critical nonconformance and will result in immediate loss of certification |
| | | **FDA:** The Food and Drug Administration (FDA) is a federal agency of the U.S. 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, cosmetics, animal foods & feed and veterinary products. |
| | | **Filtration**: The act to remove all or most of the fine particles, pollen grains, air bubbles or other material normally found in suspension. Under the True Source Certified Standard, no filtration shall occur prior to receipt by a Certified North American Packer. |

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| | | **Freight Forwarder/Logistics Broker:** Entity facilitating logistics within the supply chain that does not physically possess products at any time. |
| | | **Full Calendar Year:** January 1st through December 31st. |
| | H. | **Honey:** Honey is the natural sweet substance produced by honeybees 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. |
| | | **HRMS:** Uses the LC (Liquid chromatography)-HRMS (high resolution mass spectrometry) technique. Detects sugar syrup markers which are not occurring naturally in honey. This is done by using a database containing sugar syrups used as adulterants. The marker profiles of the syrups contained in the database are recognized in adulterated honeys. |
| | I. | **Importer:** A company that purchases honey from a Processor/Exporter or Freight Forwarder/Logistics Broker 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/Brand Purchasers. |
| | L. | **LTL:** Less than truckload quantity. Partial shipment or container load. Must meet True Source Certified Standards for full traceability and identification. |
| | M. | **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. |
| | N. | **NMR:** Uses is 1H NMR (proton nuclear magnetic resonance) profiling. 1H NMR spectra of honeys are compared with a reference database containing the spectral profiles of authentic honeys. A mismatch of the profile indicates mislabeling (variety/origin) and/or adulteration (Foreign sugar addition, improper processing practice.) |
| | | **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. |
| | P. | **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 North America that operates a Bulk Plant/Factory for purposes of preparing honey for export. |
| | Q. | **Qualified Laboratory:** A testing laboratory that has ISO 17025 certification for the required testing protocols. |
| | R. | **Re-Packer**: A company in North America that is involved in purchasing processed honey from a True Source Certified packer and repackaging in preparation for the retail, wholesale or bulk ingredient market. Re-Packer is equal to a Co-Packer for Standard requirements. |
| | S. | **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. |
| | | **Straining:** The act to remove most of the particles including comb, propolis, and other defects normally found in honey. Grains of pollen, small air bubbles, and very fine particles would not be removed. Straining is permitted under the Standard at any point in the process from Beekeeper to Packer provided that all pollen naturally present is retained throughout the process up to the point of processing by the Packer. |

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| | | **Surveillance Inspection:** A surveillance inspection is an unannounced tour of the facility and related warehouses and may include random sample collection of raw and/or processed honeys for further testing to confirm sourcing and/or authenticity. A surveillance inspection can occur at any time between Annual audits and can occur up to 2 times per year. |
| | T. | **TSH**: Means True Source Honey, LLC, a District of Columbia not-for-profit organization, having its principal offices at 1100 New Jersey Avenue S.E. Suite 910, Washington DC 20003. |
| | | **True Source Annual Fee:** An annual fee assessed to a member company, allocated for the maintenance of the standards, website, and associated marketing materials. Importers and Beekeepers will be invoiced in Q1, Exporters will be invoiced in Q2, Co-Packers and Packers will be invoiced in Q3. If membership is lost or forfeited, no refund will be issued. The North American Beekeeper membership is renewed every 3 years. |
| | | **True Source Certified Seal:** A seal bearing the unique True Source Certified identifying number, 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 3rd party auditor. |
| | U. | **Unannounced Annual Audit**: An unscheduled and unannounced Annual audit for Packers, Brand Purchaser, Co-Packers, Re-Packer, and Processors/Exporters. An announced Annual Audit is identical to the Certification Audit in content and occurs every 3 years. |
| | **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 may include data collected from U.S. Department 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. |
| | 2.3.1.5 | The following countries meet the approval criteria and established risk ratings. |

**Table 2**

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

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| | 2.3.1.5.1 | * Additional requirements may be applicable to High and Low-Risk Countries. E.g., India (Export Inspection Consul Certificate), Vietnam (Certificate of Origin Form B) |
| | 2.3.1.5.2 | ** High-Risk Countries: 3rd party audit firm supervises container loading and sampling. |

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| | **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 U.S. and International Trade Laws. |
| | 2.3.2.4 | Alleged history of illegal circumvention of U.S. and International Trade Laws. |
| | **2.3.3** | **New Exporting Countries – High-Risk** |
| | | Countries not shown on Table 2 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.<br><br>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 TSH Board of Directors (BOD) has three months to give a written determination of eligibility or denial of request to the original industry member submitter. Additionally, the BOD 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 Co-Packers/Re-Packer** |
| | | **Co-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. They do not have any ownership of the honey.<br>**Re-Packer:** A company in North America that is involved in purchasing processed honey from a True Source Certified packer and repackaging in preparation for the retail, wholesale or bulk ingredient market. Re-Packer is equal to a Co-Packer for Standard requirements.<br>(All areas of Section 3.1 are applicable to Co-Packers and Re-Packers unless specified) |
| | **3.1.1** | **Register for Certification (Co-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 Co-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 Standards (Co-Packer)** |
| | 3.1.2.1 | Maintain a system of traceability: |
| | | • Clearly identify all shipments of honey that arrive to or are shipped from the plant.<br>• Maintain the identity of each individual lot of raw honey from specific suppliers as honey is processed to create product for the retail, wholesale, or bulk ingredient market. |

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| | 3.1.2.2 | Maintain required documentation for every shipment of raw honey either by having a copy or having access to the testing results from the Packer. |
| | | EA/LC-IRMS Report: From a qualified laboratory. |
| | | HRMS Report: From a qualified laboratory. |
| | | If Co-Packer strips Ocean container with intact seal or directly from the North American beekeeper: |
| | | a. Delivery Order or BOL: Must indicate container number and True Source Seal Number or True Source Member # for North American Loads. |
| | | If Co-Packer receives a load after it goes through a port warehouse that has stripped the Ocean Container and made the individual drums available for shipment to the Packer: |
| | | a. Truck Bill of Lading/Receipt Document: Must indicate container number, True Source Honey seal number, Exporter lot number. |
| | 3.1.2.3 | Allow entry to Audit Firm for unannounced sampling. |
| | | a. If sampling results reveal that the Certified Member is out of compliance with Standards, True Source Certification may be revoked.<br>b. Co-Packers are subject to random unannounced sampling of honey at any time after initial certification.<br>c. True Source Certified has discretion to select and coordinate sample collection from Co-Packer facilities.<br>d. True Source Certified has discretion to select the type(s) of analysis performed by Laboratories as specified in Section 6 of this Standard.<br>e. True Source Certified is financially responsible for random unannounced sampling when unrelated to a Certified Audit.<br>f. Co-Packers may lose True Source Certification based on analysis indication deviation from the True Source Certified Standards by unverifiable country of origin or evidence of adulteration. |
| | 3.1.2.4 | Successfully complete audit by 3rd Party Audit Firm |
| | **3.1.3** | **Certification Audit (Co-Packers)** |
| | | The Certification Audit will evaluate the Co-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 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 import load received must have an associated True Source Certified seal number. |
| | 3.1.3.5 | **Co-Packer requirement**: Collect random samples of unprocessed honey inventory to submit for testing to a qualified laboratory to compare against stated origin (Pollen Analysis or NMR) and verify authenticity test results with same method and labs the Co-Packer used. See Section 6 for additional guidance.<br><br>Note: Any honey subject to random sampling and analysis must contain sufficient pollen to permit determination of country of origin. Absence of pollen is treated as a failure of the analysis.<br>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 U.S. Distribution.<br><br>**Re-Packer Requirement**: Collect random samples of processed honey inventory to submit for testing to a qualified laboratory to verify authenticity test results with same method and labs the Packer used. |
| | 3.1.3.6 | Presence or use of processing equipment, technology, or any applications using materials that change the fundamental composition of honey during collection, processing or packing activities constitutes a failure of the audit. This specifically includes, but is not limited to, resin processing equipment that |

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| | | requires dilution and subsequent evaporation of moisture in honey to return it to typical moisture ranges. |
| | 3.1.3.7 | Select one or more Packers at random to participate in a Supplier Assessment to confirm stated volumes of packing. |
| | 3.1.3.8 | Co-Packers will maintain and demonstrate a system to ensure honey authenticity (i.e., freedom from sugar/syrup adulteration) See Section 6 for additional guidance. At a minimum this system must include: |
| | | a. A qualified laboratory must complete the authenticity testing protocols.<br>b. All loads of honey received by a Co-Packer from a beekeeper/Exporter/Importer over 30,000 lbs. (gross weight) must be analyzed at the Co-Packer to ensure honey authenticity by means of EA/LC-IRMS and HRMS. Laboratory results must be available for review and be traceable to the load in question.<br>c. To reduce on-site paperwork and handling and time required at a facility, applicable documents may be copied and sent with the auditor to complete the full audit process. |
| | 3.1.3.9 | Annual Audit: Once a Co-Packer achieves certification, they will be subject to an annual (recertification) audit. One Annual Audit every three years will be unannounced. The certification body will provide a broad window for the audit and permit the selection of limited blackout dates within that window. This unannounced audit will consist of a plant tour (including any local, offsite warehouses) and a random sampling of raw and/or finished goods for testing to ensure authenticity with same method and labs the Packer used and raw testing to confirm country of origin. An announced Annual Audit is identical to the Certification Audit in content. Recertification audits are limited to one day. Supplier Assessment is mandatory for initial and recertification audits. As noted in 3.1.2.3, Co-Packers are subject to random unannounced sampling of honey at any time after initial certification. Co-Packers may lose True Source Certification based on analysis indication deviation from the True Source Certified Standards. |
| | 3.1.3.10 | If any audit is unsuccessful, a period of 1 year must pass before any future audits can occur. If the audit is unsuccessful a second time, a period of 3 years must pass before any future audits can occur. A subsequent finding of a listed critical nonconformance shall result in a permanent ban from participation in True Source Certified. |
| | 3.1.3.11 | Upon successful completion of the initial 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. |
| | **3.2** | **Certification for Packers/Brand Purchasers** |
| | | **Packer:** A company in North America that is involved in purchasing, blending, processing and repackaging raw honey in preparation for the retail, wholesale or bulk ingredient market.<br>**Brand Purchaser:** A company in North America that is involved in the purchase and ownership of honey, and contracts with True Source Certified Co-Packer(s) for the preparation and packaging of honey for the retail, wholesale, or bulk ingredient market. Brand Purchaser is equal to a Packer for Standard requirements.<br>(All areas of Section 3.2 are applicable to Packers and Brand Purchasers unless specified) |
| | **3.2.1** | **Register for Certification (Packers)** |
| | 3.2.1.1 | Submit a Registration Form to the Audit Firm. |
| | 3.2.1.2 | Complete the pre-certification questionnaire – issued by the audit firm prior to the first audit. Include all requested documentation. |
| | 3.2.1.3 | 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. |
| | **3.2.2** | True Source Certified Standards (Packer) |
| | 3.2.2.1 | 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 |

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| | | 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. |
| | 3.2.2.2 | Per Table 3: 90% of any Certified Packers sourcing must be considered Fully Compliant.<br>Non-compliant loads cannot exceed 5%. |
| | **Table 3** | |

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| **Fully Compliant Load:**<br><br>90% of sourcing must be fully compliant | The Processor/Exporter must have successfully completed a Certification Audit and all subsequent Annual 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, which are considered fully compliant) must be:<br>o Registered with True Source<br>o Canadian Beekeepers must meet the export requirements of the CFIA<br>o Mexican Beekeepers must meet the export requirements of the SAGARPA |
| | The Packer must have successfully completed a Certification Audit and all subsequent Annual Audits. (Not applicable to initial certification audit). |
| | All required documentation must accompany each load or shipment of raw honey and evidence of 3rd party pre-shipment inspections where applicable (see below.) |
| **Minimally Compliant Load:** | The Packer must have successfully completed a Certification Audit and all subsequent Annual 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, which are considered fully compliant) must be:<br>o Canadian Beekeepers must meet the export requirements of the CFIA<br>o 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:**<br><br>Cannot exceed 5% | 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 3.2.2.2 will cause a participant to lose their certification. |

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| | 3.2.2.3 | Purchase Honey from Approved Countries (see Section 2.3, Approved Countries). |
| | 3.2.2.4 | Maintain a system of traceability: |
| | | • Clearly identify all shipments of honey that arrive to or are shipped from the plant.<br>• Maintain the identity of each individual lot of raw honey from specific suppliers as honey is processed to create product for the retail, wholesale, or bulk ingredient market. |
| | 3.2.2.5 | Maintain required documentation for every purchase shipment of raw honey. |
| | | <u>Ocean/Truck Bill of Lading must contain the following information:</u><br>a. Shipper must be the Processor/Exporter<br>b. Place of receipt must be from the same country as the Processor/Exporter<br>c. Description must contain the following information:<br>• Honey<br>• Quantity<br>• True Source seal number (Ocean BOL) or True Source Member # (North America Loads)<br>• Processor/Exporter lot number<br>• In the case of Ocean Bill of Lading: Ocean Container Number<br>d. Buyer must be the consignee or the notify party<br>• If Freight Forwarder or Logistics Broker is utilized, solid document trail must be available |
| | | Country-Specific Export Documents: |
| | | • India – all shipments must include the EIC certificate for inspection.<br>• Vietnam – all shipments must include the Certificate of Origin form B. |
| | | Country of Origin Analysis Report: |

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| | | **<u>High-Risk countries only</u>**, Packer is responsible to sample, test and retain a laboratory report stating the country of origin for each certified load using either NMR or Pollen Analysis, conducted by a qualified lab. |
| | | If Packer strips Ocean container with intact seal or directly from the North American beekeeper: |
| | | a. Delivery Order or BOL: Must indicate container number and True Source Seal Number or True Source Member # for North American Loads. |
| | | If Packer receives a load after it goes through a port warehouse that has stripped the Ocean Container and made the individual drums available for shipment to the Packer: |
| | | a. Truck Bill of Lading/Receipt Document: Must indicate container number, True Source Honey seal number, Exporter lot number.<br>b. 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 (as applicable), True Source seal number, Exporter's lot number. |
| | 3.2.2.6 | Maintain a system of Authenticity – Packer is responsible to conduct the following analyses for every purchased shipment of raw honey: |
| | | EA/LC-IRMS Report: From a qualified laboratory. |
| | | HRMS Report: From a qualified laboratory. |
| | 3.2.2.7 | Allow entry to Audit Firm for unannounced sampling. |
| | | a. If sampling results reveal that the Certified Member is out of compliance with Standards, True Source Certification may be revoked.<br>b. Packers are subject to random unannounced sampling of honey at any time after initial certification.<br>c. True Source Certified has discretion to select and coordinate sample collection from Packer facilities and the supplying Beekeepers.<br>d. True Source Certified has discretion to select the type(s) of analysis performed by Laboratories as specified in Section 6 of this Standard.<br>e. True Source Certified is financially responsible for random unannounced sampling when unrelated to a Certified Audit.<br>f. Packers may lose True Source Certification based on analysis indication deviation from the True Source Certified Standards by unverifiable country of origin or evidence of adulteration. |
| | 3.2.2.8 | Successfully complete audit by 3rd Party Audit Firm. |
| | **3.2.3** | **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. |
| | 3.2.3.1 | Evaluate the system of traceability, 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. |
| | 3.2.3.2 | Twelve consecutive months of active facility operations, blending, processing, and repackaging raw honey, must occur prior to any scheduled audit. |
| | 3.2.3.3 | For the initial audit, a minimum of 6 months purchasing history must be provided to confirm required compliant load percentages have been met. |
| | 3.2.3.4 | Each import load must have an associated True Source Certified seal number. |
| | 3.2.3.5 | Collect random samples of unprocessed honey inventory to submit for testing to a qualified laboratory to compare against stated origin (Pollen Analysis or NMR) and verify authenticity test results with same method and labs the Packer used. See Section 6 for additional guidance.<br><br>Note: Any honey subject to random sampling and analysis must contain sufficient pollen to permit determination of country of origin. Absence of pollen is treated as a failure of the analysis. |

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| | | 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 U.S. Distribution. |
| | 3.2.3.6 | Presence or use of processing equipment, technology, or any applications using materials that change the fundamental composition of honey during collection, processing or packing activities constitutes a failure of the audit. This specifically includes, but is not limited to, resin processing equipment that requires dilution and subsequent evaporation of moisture in honey to return it to typical moisture ranges. |
| | 3.2.3.7 | Select one or more suppliers at random to participate in a Supplier Assessment to confirm stated volumes of purchase through phone interviews |
| | 3.2.3.8 | Packers will maintain and demonstrate a system to ensure honey authenticity (i.e., freedom from sugar/syrup adulteration) See Section 6 for additional guidance. At a minimum this system must include: |
| | | a. A qualified laboratory must complete the authenticity testing protocols.<br>b. All loads of honey received by a Packer from a Beekeeper/Exporter/Importer over 30,000 lbs. (gross weight) must be analyzed by the Packer to ensure honey authenticity by means of EA/LC-IRMS and HRMS. Laboratory results must be available for review and be traceable to the load in question.<br>c. To reduce on-site paperwork and handling and time required at a facility, applicable documents may be copied and sent with the auditor to complete the full audit process. |
| | 3.2.3.9 | Annual Audit: Once a Packer achieves certification, they will be subject to an annual (recertification) audit. One Annual Audit every three years will be unannounced. The certification body will provide a broad window for the audit and permit the selection of limited blackout dates within that window. This unannounced audit will consist of a plant tour (including any local, offsite warehouses) and a random sampling of raw and/or finished goods for testing to ensure authenticity with same method and labs the Packer used and raw testing to confirm country of origin. An announced Annual Audit is identical to the Certification Audit in content. Recertification audits are limited to one day. Supplier Assessment is mandatory for initial and recertification audits. As noted in 3.2.2.7, Packers are subject to random unannounced sampling of honey at any time after initial certification. Packers may lose True Source Certification based on analysis indication deviation from the True Source Certified Standards. |
| | 3.2.3.10 | If any audit is unsuccessful, a period of 1 year must pass before any future audits can occur. If the audit is unsuccessful a second time, a period of 3 years must pass before any future audits can occur. A subsequent finding of a listed critical nonconformance shall result in a permanent ban from participation in True Source Certified. |
| | 3.2.3.11 | Upon successful completion of the initial 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. |
| | 3.2.3.12 | Re-Packer/Co-Packer/Brand Purchaser/Packer Annual Fees |
| | **Table 4** | |

| Pounds Processed/Handled | Annual Fee (USD) |
|---|---|
| 0-2 Million Pounds | $575 |
| 2.1-5 Million Pounds | $1,250 |
| 5.1-15 Million Pounds | $3,250 |
| 16-30 Million Pounds | $5,495 |
| 31-45 Million Pounds | $6,750 |
| 46-60 Million Pounds | $7,495 |
| 61-75 Million Pounds | $8,750 |
| 76+ Million Pounds | $10,000 |

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| | **3.3** | **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. (All areas of Section 3.3 are applicable to High-Risk and Low-Risk countries unless specified) |

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| | **3.3.1** | **Register for Certification (Processor/Exporters)** |
| | 3.3.1.1 | Submit a Registration Form to the audit firm. |
| | 3.3.1.2 | 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. |
| | **3.3.2** | **True Source Certified® Standards (Processor/Exporters)** |
| | 3.3.2.1 | 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. |
| | 3.3.2.2 | Exporters may purchase up to 50% of their volume from one collector and/or up to 10% from non-certified Exporters. |
| | | a. The collector and/or non-certified Exporters must be visited by the auditor as part of the certification audit process.<br>b. If more than 50% and/or 10% respectively is purchased from these suppliers, the supplier is required to undergo a full certification audit as an independent business entity.<br>c. If purchases from the suppliers exceed the amounts noted above, and the suppliers have not successfully completed a full certification audit, the Exporter audit will be considered a failure to meet the TSC Standards. |
| | 3.3.2.3 | Twelve consecutive months of active facility operations, blending, processing, and repackaging raw honey, must occur prior to any scheduled audit. |
| | 3.3.2.4 | For the initial audit a minimum of 12 months verifiable export history (would not have to be specifically export to the U.S.) prior to an audit. |
| | 3.3.2.5 | Establish and maintain a system of traceability. |
| | 3.3.2.5.1 | Include records of all purchases from Beekeepers and collectors. |
| | 3.3.2.5.2 | Identify individuals responsible for traceability and authenticity utilizing descriptions of responsibilities or an organizational chart |
| | 3.3.2.5.3 | Risk Assessment: Identify potential risks and preventative measures used to ensure traceability and authenticity. |
| | 3.3.2.5.4 | Include a system of traceability that can account for the blending of various lots from different suppliers to create a shipping batch. Any lots not intended for sale directly or through registered Importers to True Source Certified Packers must be clearly identified as soon as the receipt/quality control process is complete, and that identity must be preserved throughout the manufacturing and blending process. All honey in inventory, or in process, is subject to origin sampling.<br>• System to include a written recall program<br>• System to include annual mock recall exercise |
| | 3.3.2.5.5 | 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. |
| | 3.3.2.5.6 | Clearly label all individual drums within each certified load as follows: |
| | | • Product: Honey<br>• Country of Origin<br>• Exported by: Process or/Exporter name and address<br>• Imported by: Importer name and address<br>• True Source Certified® ID number<br>• Lot number (as per Processor/Exporter traceability system)<br>• Drum number<br>• Gross, Tare, Net weight (if not included in shipping documents) |
| | 3.3.2.5.7 | Each certified load must be sealed using a True Source Certified® Seal. |

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| | | **<u>High-Risk countries only,</u>** – the audit firm will randomly sample drums prior to shipment and supervise container loading and seal the load using a True Source Certified® Seal. |
| | 3.3.2.5.8 | All Exporters: Maintain required export documentation: |
| | | <u>Ocean/Truck Bill of Lading must contain the following information:</u> |
| | | a. Shipper must be the Processor/Exporter<br>b. Place of receipt must be from the same country as the Processor/Exporter<br>c. Description must contain the following information:<br>• Honey<br>• Quantity<br>• True Source seal number (Ocean BOL) or True Source Member # (North America Loads)<br>• Processor/Exporter lot number<br>• In the case of Ocean Bill of Lading: Ocean Container Number<br>d. Buyer must be the consignee or the notify party<br>• If Freight Forwarder or Logistics Broker is utilized, solid document trail must be available. |
| | | Country-Specific Export Documents: |
| | | • India – all shipments must include the EIC Certificate for inspection.<br>• Vietnam – all shipments must include the Certificate of Origin form B. |
| | 3.3.2.6 | Maintain a system of Authenticity |
| | 3.3.2.7 | Processor/Exporters are subject to random unannounced Surveillance Inspections to include sampling of honey at any time after initial certification. |
| | | a. True Source Certified has discretion to select and coordinate inspections and sample collection from Processor/Exporter facilities.<br>b. Analysis of samples collected during Surveillance Inspections must align with the processor/Exporters testing protocol- see Section 3.3.3.1.5<br>c. All honey at the facility must be accessible for random sampling and analysis for origin and must contain sufficient pollen to permit determination of country of origin.<br>d. Any lots not intended for sale to the True Source Certified Clients must be clearly identified and are not subject to authenticity analysis.<br>e. Honey in Untested/QC status may be sampled during an audit and if it fails testing the non-conformance response to that failure shall demonstrate that all accept/reject policies were followed.<br>f. True Source Certified is financially responsible for random unannounced inspections and sampling when unrelated to a Certified Audit.<br>g. Processor/Exporters may lose True Source Certification based on analysis indicating deviation from the True Source Certified Standards |
| | **3.3.3** | **Certification Audit (Processors/Exporters)** |
| | 3.3.3.1 | 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. |
| | 3.3.3.1.1 | Document Audit |
| | | a. Traceability and authenticity programs and process flow charts for raw materials through processing to shipment.<br>b. Purchase and sales transactions including approved supplier lists with complete contact information.<br>c. Shipping document review containing True Source Certified seal numbers.<br>d. Mass Balance: Purchases/Inventory/Domestic market/True Source Certified Shipments.<br>e. Invoices for purchase and sale, bills of lading, drum purchasing records.<br>f. Current and prior year beekeeper/collector list with hive counts, address, phone number and quantities purchased from each, indicating the container type in which honey is purchased. |

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| | | g. When utilizing offsite collectors/collection center locations for homogenizing honey collections:<br>• Locations must be assessable to auditor upon request.<br>• Full document traceability of transfers and homogenization records must be maintained and provided to auditor.<br>• Locations must have shared ownership of the Processor/Exporter seeking certification. or<br>• Locations must be current Processors/Exporters fully certified to the True Source Certified Standards. |
| | 3.3.3.1.2 | Sample Collection (during audit): The audit firm will collect random samples of unprocessed, or in-processed, honey inventory to compare against stated origin (Pollen Analysis or NMR) and test for authenticity (based on the company's protocol – see Section 3.3.3.1.5.)<br><br>Note:<br>• All honey at the facility must be accessible for random sampling and analysis for origin and must contain sufficient pollen to permit determination of country of origin. All honey in inventory, or in process, is subject to origin sampling.<br>• Any lots not intended for sale to True Source Certified Clients must be clearly identified and are not subject to authenticity analysis.<br>• Honey in Untested/QC status may be sampled during an audit and if it fails testing the non-conformance response to that failure shall demonstrate that all accept/reject policies were followed. |
| | 3.3.3.1.3 | Presence or use of processing equipment, technology, or any applications using materials that change the fundamental composition of honey during collection, processing or packing activities constitutes a failure of the audit. This specifically includes, but is not limited to, resin processing equipment that requires dilution and subsequent evaporation of moisture in honey to return it to typical moisture ranges. |
| | 3.3.3.1.4 | Suppliers (Beekeepers and collectors) will be selected at random to participate in a field audit to consist of no more than 2 days to confirm stated volumes of trade. (Not applicable to triennial unannounced audits). |
| | 3.3.3.1.5 | Processors/Exporters will maintain and demonstrate a system to ensure honey authenticity (freedom from sugar/syrup adulteration) samples collected during the audit will be tested with the same method and labs the Exporter used. See Section 6 for additional guidance. |
| | | a. A qualified laboratory must complete the testing protocols<br>b. Acceptable forms of analysis must evaluate the C3 and C4 content of the honey. Current methodology that meets these expectations includes: EA/LC-IRMS and HRMS. |
| | 3.3.3.1.6 | Annual Audit: Once a Processor/Exporter achieves certification, they will be subject to an Annual (recertification) Audit. One Annual Audit every three years will be unannounced. The certification body will provide a broad window for the audit and permit the selection of limited blackout dates within that window. This unannounced audit will consist of a plant tour (including any local, offsite warehouses) and a random sampling of raw and/or finished goods for testing to ensure authenticity and raw testing to confirm country of origin. An announced Annual Audit is identical to the Certification Audit in content with the exception of beekeeper visits. Beekeepers will not be inspected during an unannounced audit. Recertification audits are limited to one day. Supplier Assessment is mandatory for initial and recertification audits. As noted in 3.3.2.7, Processors/Exporters are subject to random unannounced sampling of honey at any time after initial certification. Processors/Exporters may lose True Source Certification based on analysis indication deviation from the True Source Certified Standards. |
| | 3.3.3.1.7 | If any audit is unsuccessful, a period of 1 year must pass before any future audits can occur. If the audit is unsuccessful a second time, a period of 3 years must pass before any future audits can occur. A subsequent finding of a listed critical nonconformance shall result in a permanent ban from participation in True Source Certified. |

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| | 3.3.3.1.8 | Upon successful completion of the initial 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. |
| | 3.3.3.1.9 | Processor/ Exporter Annual Fees |

**Table 5**

| Containers Exported to US/Year | Annual Fee (USD) |
|---|---|
| 0-50 | $575 |
| 51-100 | $1,150 |
| 101-150 | $1,725 |
| 151-250 | $2,300 |
| 251-350 | $2,875 |
| 351-450 | $3,450 |
| 451-550 | $4,025 |
| 551+ | $4,600 |

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| | **3.4** | **Audit and certification procedures** |
| | **3.4.1** | **Audits may only be conducted by a 3rd-Party audit firm approved by the True Source Honey Board.** |
| | | The 3rd-Party audit firm is directly responsible for:<br>• Audit administration, scheduling, contracting, and reporting audit results to client.<br>• Issuing of certificates.<br>• Handling complaints and appeals (see Section 5.2 Complaints and Appeals).<br>• Auditor oversight, auditor training, ongoing updates/education of auditors, auditor calibration, auditor performance and competence. The 3rd-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 3rd-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. |
| | **3.4.2** | **Auditor Requirements** |
| | | To become a program auditor, individuals must be:<br>• Experienced auditor<br>• Experience in food schemes<br>• Experience auditing schemes that have a traceability component<br>• Experience with on-site sampling<br>• Experience/training in the field of production and traceability for food processing eligible in the area of general foodstuffs (at least 2 years).<br>• Evidence of at least 10 audits/inspections. |
| | **3.4.3** | **New auditors** |
| | 3.4.3.1 | Undergo training that incorporates a mock audit that included traceability training specific to True Source Honey. |
| | 3.4.3.2 | Complete the required training and pass a written test to confirm knowledge of the standard and audit criteria. |
| | | • On-going monitoring and evaluation of Auditor by the certification bodies must include:<br>  ○ Participation in random evaluation process, to help determine auditor compliance and consistency of results, to potentially include:<br>  ○ Witness audits<br>  ○ Review of auditor's scoring/audit results<br>  ○ Additional witness audits as needed if concerns are identified during the review process |

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| | | ○ 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. |
| | **3.5** | **Report Reviews and Certification Decisions** |
| | **3.5.1** | **Eligibility** |
| | | To be eligible to review audit reports and make certification decisions, individuals must meet the auditor requirements set out in Section 3.4.2. Auditors must not review or make certification decisions on their own audits. |
| | **3.5.2** | **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. |
| | **3.6** | **Certificate Validity** |
| | **3.6.1** | **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.** |
| | **3.6.2** | **Certificates may be extended in exceptional cases (e.g., extenuating circumstances such as a strike, severe weather or illness). The 3rd 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 3rd-Party audit firm prior to certificate expiry, and<br>b. The audit will occur during the extension period, and<br>c. Justification for the extension is recorded as per the 3RD-PARTY AUDIT FIRMs internal procedures. |
| | **3.6.3** | **Further to this clause, the following policies are to be followed related to the expiration date for North America Honey Packers/Brand Purchasers, Co-Packers/Re-Packers and International Processors/Exporters (herein referred to as "client");** |
| | | • The following schedule is to be followed for the initiation of the renewal audit.<br>○ 2 months (minimum) prior to TSC expiration date - the client is to receive their first notice advising that the renewal process is being initiated, including scheduling the audit date.<br>○ 1 month prior to TSC Expiration date – If signed forms and audit fees not received by this time, a reminder is forwarded to client and client is advised that TSC will be suspended on expiration date.<br>• If following the audit, specific corrective action is required by the client before TSC is granted, client is advised that corrective action and approval of this action must be completed within 60 days from the expiry date of current TSC, or TSC will be suspended for failure to complete audit in a timely manner. |
| | **3.7** | **Certification Decisions** |
| | **3.7.1** | **The 3rd-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 3rd-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.<br>• All requirements of the standard have been fully covered, using any supporting notes made during the audit by a suitably qualified auditor.<br>• 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. |

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| | | • All areas of non- conformity have been identified and effective corrective action has been taken to resolve these non-conformities. |
| | **3.8** | **Suspensions and Decertification** |
| | **3.8.1** | **The 3rd-Party audit firm shall have a policy and documented procedure(s) for suspension certification and decertification and shall specify the subsequent actions by the 3rd-Party audit firm.** |
| | **3.8.2** | **The 3rd-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.<br>• 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.<br>• Under suspension, the client's certification is temporarily invalid. The 3rd-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 3rd-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.<br>• 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.<br><br>Failure to resolve the issues that have resulted in the suspension in a time established by the 3rd-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 (beehives). |
| | **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) 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 requirements of Table 6 for the sale of Fully, Minimally and Non-Compliant loads of honey to Certified Packers, Processor/Exporters or Participating Importers. |
| | 4.1.2.3 | Produce and sell honey in accordance with the FDA Food Safety Modernization Act of 2010. |
| | 4.1.2.4 | Requirements for North American Beekeepers (Canada, Mexico, and the United States) |
| | **Table 6** | |

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| 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, and Mexican Beekeepers must meet all SAGARPA requirements. |
| | 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. |

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| 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, and Mexican Beekeepers must meet all SAGARPA requirements. | |
| | 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. | |

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| 4.1.2.5 | Canadian Beekeepers must meet all CFIA regulations when selling to a Processor/Exporter or Packer in order to be considered fully compliant. |
| 4.1.2.6 | Mexican Beekeepers must meet all SAGARPA requirements when selling to a Processor/Exporter or Packer in order to be considered fully compliant. |
| **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) and submit the form and registration fee to True Source Honey. |
| 4.2.1.2 | Importer Annual Fees |

**Table 7**

| Number of containers/truckloads imported into the US per year | Annual Fee |
|---|---|
| 0-100 | $1,725 |
| 101-200 | $3,540 |
| 201-300 | $5,175 |
| 301-400 | $6,900 |
| 401-500 | $8,625 |
| 501-750 | $10,350 |
| 751-1000 | $12,075 |
| 1001-1500 | $13,800 |
| 1501+ | $15,525 |

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| **4.2.2** | **True Source Certified® Standards (Importers)** |
| 4.2.2.1 | Understand the requirements for Fully Compliant, Minimally Compliant and Non-Compliant loads. See Section 3.2.2.2. |
| 4.2.2.2 | Purchase Honey from Approved Countries for Certified Transactions (see Section 2.3.1.5, Approved Countries). |
| 4.2.2.3 | True Source Certified® seal number: All documents must identify loads for shipment using the True Source seal number for High-Risk origins as well as Fully Compliant loads. (Minimally compliant loads do not require the use of the seal number -see Section 3.2.2.2.). |
| 4.2.2.4 | Maintain the following required documents for each load from a Processor/Exporter to Packer according to True Source Certified® Standards. (Section 7.2 Examples) |
| | Ocean/Truck Bill of Lading must contain the following information: |
| | a. Shipper must be the Processor/Exporter<br>b. Place of receipt must be from the same country as the Processor/Exporter |

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| | | c. Description must contain the following information:<br>• Honey<br>• Quantity<br>• True Source seal number (Ocean BOL) or True Source Member # (North America Loads)<br>• Processor/Exporter lot number<br>• In the case of Ocean Bill of Lading: Ocean Container Number<br>d. Buyer must be the consignee or the notify party<br>• If Freight Forwarder or Logistics Broker is utilized, solid document trail must be available. |
| | | Country-Specific Export Documents: |
| | | • India – all shipments must include the EIC certificate for inspection.<br>• Vietnam – all shipments must include the Certificate of Origin form B. |
| | | If Packer strips Ocean container with intact seal or directly from the North American beekeeper: |
| | | a. Delivery Order or BOL: Must indicate container number and True Source Seal Number or True Source Member # for North American Loads. |
| | | If Packer receives load after it goes through a port warehouse that has stripped the Ocean Container and made the individual drums available for shipment to the Packer: |
| | | a. Truck Bill of Lading/Receipt Document: Must indicate container number, True Source Honey seal number, Exporter lot number.<br>b. 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 (as applicable), True Source seal number, Exporter's lot number. |
| | 4.2.2.5 | True Source Certified honey loses certification status if sold to a non-True Source Certified Packer or non-True Source entity. |
| | | a. Importers are required to fully inform non-True Source Packers and non–True Source entities of status change.<br>b. Importers shall not misrepresent status, or sell honey as True Source Certified to any non-True Source Packer or non-True Source entity.<br>c. Failure to inform of status change, or misrepresentation of status, will cause immediate suspension of Importer participation in the True Source program. |
| | 4.2.2.6 | 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 3rd-Party audit firm for certification and annual fee determination purposes.** |
| | **5.1.2** | **The administrative 3rd-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 3rd-party audit firm. The 3rd-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** |

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| | 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 (TSH), 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 and True Source Honey® Logos** |
| | | 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 | The True Source Certified® logo is for use by True Source Certified® members only who have successfully completed a True Source Certified® audit. |
| | 5.3.2.2 | 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. |
| | 5.3.2.2.1 | 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. |
| | 5.3.2.2.2 | The True Source Certified® and True Source Honey® logos 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® and True Source Honey® logos 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. |
| | 5.3.2.2.4 | The True Source Certified® and True Source Honey® logos must be used correctly to protect the integrity of the logos and the program. |
| | 5.3.2.2.5 | Translation or localization of the True Source Certified® and True Source Honey® logos is not allowed. The logos may be used in English only. |
| | 5.3.2.2.6 | The artwork used in the application of the True Source Certified® and True Source Honey® logos 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. |

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| | | **The following guidelines must be strictly observed when using the True Source Certified® and/or True Source Honey® logos.** |
| | 5.3.2.3 | True Source Certified® Logo Applications: |
| | 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 | 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 one of the following audits: Co-Packer, Re-Packer, Packer, or Brand Purchaser. |
| | 5.3.2.3.3 | The True Source Certified® logo may only be applied to products which are 100% authentic honey. Products which blend sweeteners, flavors, or ingredients other than honey may not bear the True Source Certified® logo. |
| | 5.3.2.3.4 | 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. |
| | 5.3.2.3.5 | 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. |
| | 5.3.2.4 | True Source Honey® Logo Applications: |
| | 5.3.2.4.1 | 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. |
| | 5.3.2.4.2 | 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. |
| | 5.3.2.4.3 | 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** | **Suspension, Withdrawal and Transfer of Trademark Use** |
| | 5.3.3.1 | 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;<br>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 |
| | 5.3.3.2 | 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. |
| | 5.3.3.3 | 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. |

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| | 5.3.3.4 | 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. |
| | 5.3.3.5 | 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. |
| | 5.3.3.6 | Transfer of Authorization for Certification and Use of the Mark<br>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". |
| | **5.3.4** | **Right of Appeal – Participating Member Company** |
| | 5.3.4.1 | 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. |
| | 5.3.4.2 | 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. |
| | 5.3.4.3 | After receiving the notice of appeal, TSH must either: |
| | 5.3.4.4 | Give notice to the Member Company that it has reversed in decision to suspend or withdraw the Member Company's Membership; or |
| | 5.3.4.5 | Refer the appeal to independent adjudication or arbitration in accordance with its appeal procedures. |
| | **5.3.5** | **Notices and Register – Participating Member Company** |
| | 5.3.5.1 | 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. |
| | 5.3.5.2 | 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. |
| | **5.3.6** | **Right of Appeal – Certified Company** |
| | 5.3.6.1 | 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. |
| | 5.3.6.2 | 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. |
| | 5.3.6.3 | 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<br>b. Refer the appeal to independent adjudication or arbitration in accordance with its appeal procedures. |
| | **5.3.7** | **Notices and Register – Certified Company** |

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| | 5.3.7.1 | 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. |
| | 5.3.7.2 | 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. |
| | **5.3.8** | **Amendment of Rules of Use** |
| | 5.3.8.1 | TSH may from time to time alter these rules or make new rules, but no such alteration or new rules shall affect 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. |
| **6** | | **Authenticity Guidance for 3Rd Party Auditors and True Source Honey Members** |
| | 6.1 | Testing Variability and root cause analysis |
| | | Due to the variable nature of honey and the challenges this poses for the authenticity testing methods, there will be times when the testing results will be inconclusive. Inconclusive results require additional investigation and/or testing in order to arrive at a final conclusion. Different targeted tests, other than those mentioned in this document, may be used when conducing a root cause analysis. |
| | 6.1.1 | A Packer must conduct a root cause analysis that could include investigation of the beekeeping practices and additional testing as recommended by the selected lab. For example, an NMR test could be used to clear/reverse a finding of HRMS adulteration.<br>If as part of this root cause analysis and additional testing the determination is adulterated, the load will be determined to be adulterated. If the results are inconclusive and the lab is unable to make any specific determination, the client may decide per their chosen business practices. If there is a repetition of such cases it would be cause for concern during an audit. |
| | 6.1.2 | The following table provides guidance based on the battery of tests selected for a lot of raw honey. |
| | 6.1.2.1 | C3/C4 and LC-HRMS |
| | Table 8 | |

| **Test Type and Result** | | | |
|---|---|---|---|
| EA/LC-IRMS – C4 | EA/LC-IRMS – C3 | HRMS | Conclusion |
| Pass | Pass | Pass | Pass |
| Pass | Fail | Pass | Pass |
| Pass | Pass | Fail | Fail |
| Pass | Fail | Fail | Fail |
| Fail | Pass | Pass | Fail |
| Fail | Fail | Fail | Fail |

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| | **6.1.3** | **Auditor Sampling Protocol at Exporter/Packer** |
| | 6.1.3.1 | When raw honey samples are taken, the samples need to be identified as thoroughly as possible (lot #, drum #, color etc…). It is also important to note if the sample is from an individual beekeeper, or a homogenized sample. There will be more variability in non-homogenized loads. If testing results indicate variances, additional information will be necessary, before a determination can be made. |
| | 6.1.3.2 | The audit firm is required to use the same testing laboratory and methodology as the Exporter/Packer. |
| **7** | | **Additional Information** |
| | **7.1** | **Approved Pollen Analysis and NMR for Country of Origin verification Laboratories**<br>**Please note this is only for Pollen Analysis and NMR geographical origin.**<br>**EA/LC-IRMS and HRMS require an ISO certified lab for testing.** |
| | 7.1.1 | Intertek Food Services GmbH |
| | | Olof-Palme-Str. 8, 28719 Bremen Germany<br>Phone: +49 (0) 421 65 727 1 Fax: +49 (0) 421 65 727 222<br>Email: applica@intertek.com, Website: www.intertek.de |

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| | | 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<br>Code: 175600 – NMR includes geographical/botanical Origin |
| | 7.1.2 | Quality Services International GmbH: |
| | | Flughafendamm 9a, 28199 Bremen Germany<br>Phone: +49 - (0)421 - 59 47 70, Fax: +49 - (0)421 - 59 47 71<br>Email: info@qsi-q3.de , Website: www.qsi-q3.de<br>Code: 250 - Pollen Analysis, Botanical and Geographical Origin, IUBS 1978, compliance with international rules e.g. Codex, IHC<br>Code: 40500 – NMR for Origin |
| | 7.1.3 | Eurofins Food Integrity Control Services GmbH: |
| | | Berliner Straße 2, 27721 Ritterhude Germany<br>Phone: +49 (0)4292 4077200, Fax: +49 (0)4292 4077299<br>Email: efics@eurofins.de<br>Code:<br>PTH04 (Pollen Analysis - Botanical and Geographical Origin - Advanced Report)<br>THH56 (Pollen Analysis - Geographical Origin - Advanced Report)<br>AA0SG – NMR for Origin |
| | 7.1.4 | FOODQS GmbH: |
| | | Mühlsteig 15, 90579 Langenzenn Germany<br>Phone: +49 - (0) 9101 – 701830, Fax: +49 - (0) 9101 – 7018320<br>Email: info@foodqs.de, Web: www.foodqs.de<br>Code: 202 (type of honey specification 3): pollen analysis incl. geographical origin, yeast, starch, conductivity, sensoric |

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|---|---|---|
| | **7.2** | **Examples of Required Documentation** |
| | **7.2.1** | **Ocean Bill of Lading (BOL)** |

Consignor/Shipper

PROCESSOR/EXPORTER

**OCEAN BILL OF LADING**

Consigned to order of

TO ORDER
OR IMPORTER'S NAME

S.S LINE CIE

Notify address

IMPORTER'S NAME
IF OCEAN BILL OF LADING
MADE TO ORDER

Place of receipt
HOCHIMINH CITY

Ocean vessel

Port of loading
HOCHIMINH CITY

Port of discharge
HOUSTON

Place of delivery
HOUSTON

PLACE OF RECEIPT
AND PORT OF LOADING
MUST BE IN THE COUNTRY
OF ORIGIN OF THE HONEY

| Marks and numbers | Number and king of packages | Description of goods | Gross weight | Measurement |
|---|---|---|---|---|
| TRLU123456<br>SEAL : 00824 | 65 DRUMS | VIETNAMESE HONEY<br>Processor/Exporte Lot#:<br>TRUE SOURCE ID # : XXXX<br>(SEAL #) | | |

ORIGINAL

according to the declaration of the consignor

Declaration of interest of the consignor in timely delivery (Clause 6.2.)

Declared value for ad valorem rate according to the declaration of the consignor (Clauses 7 and 8).

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 | Freight payable at | Place and date of issue |
|---|---|---|
| USD AS PER AGREEMENT | ORIGIN | |
| Cargo Insurance throught the undersigned<br>☒ Not covered ☐ Covered according to attached Policy | Number of Original BL's<br>3 (THREE) | Stamp and signature |
| For delivery of goods please apply to: | | AS AGENT |

| | 7.2.2 | Lab Report |
|---|---|---|

**Quality Services International GmbH**

# Test Report No. 210-505717

QSI GmbH - Flughafendamm 9a - D-28199 Bremen

Date: 19-Feb-2020

**Customer No.:** **Sample No.:**

Product: Honig/Honey

**Label:**

Arrival Date: Start / End of Analysis:

Kind: Packaging:

Seal: Temp.:

**VA220** (2019-08) **Botanical and geographical Origin, compliance with EC-Honey Directive**

| Parameter (Method) | Unit | Result |
|---|---|---|
| Electr.conductivity(ASU L 40.00-5, 2003-12, mod^) | mS/cm | |
| rel.frequency of pollen(ASU L 40.00-11, 2003-12, mod.^^) | | |
| Predominant pollen 1 | % | |
| Predominant pollen 2 | % | |
| Secondary pollen 1 | % | |
| Secondary pollen 2 | % | |
| Secondary pollen 3 | % | |
| Minor pollen 1 | % | |
| Minor pollen 2 | % | |
| Minor pollen 3 | % | |
| Identified pollentypes | | |
| HD-Elements, fungal spores * | | |
| HD-Elements, waxwool * | | |
| HD-Elements, waxstrings * | | |
| Yeastcontent, estimation (VA 262) | | |
| Starchgrains ** (VA 268) | | |
| Other solid constituents | | |

Test Report No

Page: 1 of 2

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Flughafendamm 9a
D-28199 Bremen

Tel. +49 421 596807-0
e-mail: info@qsi-q3.de
GTC see homepage
www.qsi-q3.de

Amtsgericht Bremen
HRB 18842
Managing Director:
Gudrun Beckh

Berenberg Bank
IBAN: DE32 2012 0000 0065 9320 06
BIC: BEGO DE HH
VATIN: DE 202142221

| | |
|---|---|
| | |
| | |
| | |
| | |
| | |
| | |
| | |

Accredited method

u.r. = underrepresented; o.r. = overrepresented, k = counts without nectarless plants

*HD = Honeydew; ** Starchgrains in % per 300 pollen- and starchgrains counted

^Weighing, ^^Adjustment in volume and temperature, ^^^Matrix: only Honey

**Conclusion:**

Quality Services International GmbH Version 0

Test Manager
Food Chemist

This examination is the basis for special decision guidance.

The test results are exclusively related to the items tested for this sample in the above mentioned time frame for analysis. Method and measurement uncertainty details are available upon request. This report is allowed to be copied completely and unchanged but not in extracts.



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Tel. +49 421 596607-0
e-mail: info@qsi-q3.de
GTC see homepage
Amtsgericht Bremen
HRB 18842
Managing Director:
Berenberg Bank
IBAN: DE32 2012 0000 0065 9320 06
BIC: BEGO DE HH

| | 7.2.3 | Local Sampling Report (High-Risk Countries) |
|---|---|---|

TRUE SOURCE HONEY HIGH RISK LOAD INSPECTION REPORT

| | | | |
|---|---|---|---|
| **Inspection Report No** | | **Date** | |
| **Inspector:**<br>(At time of loading) | | | |

**GENERAL DETAILS**

| | |
|---|---|
| Client/Facility Name: | |
| Client Address: | |
| Destination Country: | |
| Facility Representative: | |
| Tel: | |
| Fax: | |
| E-mail: | |
| AWB Number: | |
| C3/C4 Test Report: | |

**PRODUCT DETAILS**

| | |
|---|---|
| Product Description | |
| Batch No and Production Date | |
| Batch size (in weight) | |
| Importer Name | |
| Invoice No | |
| P.O Number and P.O Date | |

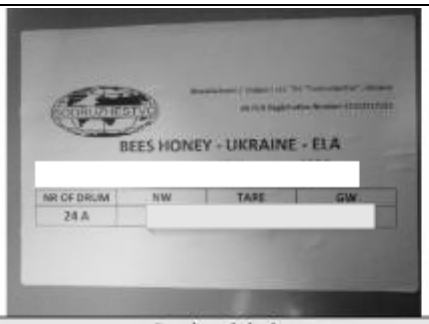
**Sampling and Loading are summarised in following tabulated paragraphs.**

**SAMPLING**

| | | |
|---|---|---|
| Sampling Date | | |
| Sampling Inspector | | |
| Sampling Location | | |
| Sampling Process | | |
| Sampled drum numbers | | |
| Sampled product seal Identification details | Sample Seal Identification Code | |
| | Customer | Laboratory |
| | Lot & Drum Sampled | |

**PHOTO**

| | |
|---|---|
| | |
| **Security Seal of Drum** | **Security Seal of Drum** |
| | |
| **Sample No. 1 (Send to QSI laboratory) NSF seal No.** | **Sample No. 2 (Processor keeping) NSF seal No.** |




Product label

Loaded container

Container back view

True Source Certified Seal No.

**********End of Report**********

| | 7.2.4 | Export Inspection Consul Certificate for Inspection (India) |
|---|---|---|

## CERTIFICATE FOR INSPECTION

| 1. Name and Address of the Exporter | 4. Buyer's Order No. & Date | 5. VALID FOR CUSTOMS |
|---|---|---|
| IE CODE: 0288014910 | PURCHASE CONTRACT NO. 1234 | |
| **2. Name and Address of the Approved Processing Plant** | **6. Invoice No. & Date** | **7. Country of Destination** |
| | 1234/2010-2011<br>03.03.2011 | USA |
| **3. Details of stamp on export packages** | **8. Certificate No. 456789** | |
| Approval No.<br>HONEY -04-006 | Valid Upto and including 16-Apr-11 | |

9. Specification Reference: As per buyer's specification.

| 10. Shipping Marks | 11. No. and kind of Pkgs. | 12. Description of Goods | 13. Quantity | 14. FOB value |
|---|---|---|---|---|
| PURCHASE CONTRACT NO.<br>BN126K1 TO BN126K186<br>300.000 KGS.<br>WHITE HONEY<br>PRODUCT<br>OF INDIA<br>**True Source Certified ID # 000000 ID # 123456 ID # 654321** | **True Source Certified ID # 000000 ID # 123456 ID # 654321**<br>TOTAL 186 DRUMS PACKED | NATURAL<br>HONEY<br>PURE UNADULTERATED BEES HONEY-ORIGIN INDIA<br>-PACKED IN FOOD GRADE EPOXY COATEDE M.S. DRUMS | 55.800<br>MT | INR<br>7335152.00 |

...of any upward revision in the F. O. B. Value the Customs may advise the Exporter to get the amendment done From the nearest office of Export Inspection Agency on Payment of additional inspection Fee.

15. **DECLARATION**

The undersigned hereby declares :

(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 & Monitoring) Rules, 2002.

And

(ii) that the consignment is exportworthy.

EIA- DELHI

(Signature)

(Name)

QUALITY INCHARGE

(Designation)

Place ..... Date 3-Mar-11

| | 7.2.5 | Certificate of Origin Form B (Vietnam) |
|---|---|---|

1. Goods consigned from (Exporter's business name, address, country)

**Processor/Exporter**
Name:
Address:

Reference No. 16230441

**CERTIFICATE OF ORIGIN**
*(Combined declaration and certificate)*
**FORM B**
Issued in Vietnam

2. Goods consigned to (Consignee's name, address, country)

**Importer**
Name:
Address:

4. Competent authority (name, address, country)

CHAMBER OF COMMERCE & INDUSTRY OF VIETNAM
HO CHI MINH CITY BRANCH
171 Vo Thi Sau Str., 3rd 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

3. Means of transport and route (as far as known)

Vessels: BUXLAGOON V.81113R
B/L No: PFSPHI 140090 Date: April 02, 2011
Port of loading: HOCHIMINH CITY, VIETNAM
Port of discharge: PHILADELPHIA, USA
Place of Delivery: PHILADELPHIA, USA

5. For official use

6. Marks, numbers and kind of packages; description of goods

PURE UNADULTERATED BEES HONEY- ORIGIN VIETNAM

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

MARKING:
BEES HONEY FROM VIETNAM
LOT NUMBER:
DRUM NUMBER: 65 DRUMS

NW: 300KGS/DRUM
GW: 317KGS/DRUM
TARE: 17KGS
COLOR: LIGHT AMBER
ODEM10030/PO #4913/2

CONTRACT NO(S). PC 4913

CONTAINER NO / SEAL NO:

ORIGINAL

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

8. Number and date of invoices

No.

Dated: March 30, 2011.

9. Certification

It is hereby certified, on the basis of control carried out, that the declaration by the exporter is correct.

CHAMBER OF COMMERCE AND INDUSTRY OF VIETNAM
P.P SECRETARY GENERAL

TỔ CẤP C/O SỞ 2 TẠI TP HỒ CHÍ MINH

TRẦN THỊ NGỌC HẰNG

HO CHI MINH CITY, April 07, 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 USA

(Importing country)

CÔNG TY TRÁCH NHIỆM HỮU HẠN HUY HOÀN

VÕ HOÀNG NHƯ TÙNG

HO CHI MINH CITY, April 07, 2011

| | 7.2.6 | Truck Bill of Lading |
|---|---|---|

**WAREHOUSING LLC**

**Truck BOL**

DATE: 4/3/20

**SEAL #** 72 37161

| **SHIPPER** | **DELIVER TO** |
|---|---|
| Packer/ Importer/ Packer or Processor | Packer |
| | PO# |
| | CONT# |

| **PIECES** | **DESCRIPTION & MARKS** | **WEIGHT** |
|---|---|---|
| 67 DRUMS | HONEY<br>*TS#*<br>*LOT#*<br>CUSTOMER PICK UP<br>X _____<br>DATE: _____ | 44,489 |

| | 7.2.7 | Warehouse Inbound Receipt (If Packer is having port warehouse strip container) |
|---|---|---|

# WAREHOUSE RECEIPT

Claims a lien for all lawful charges for storage and preservation of the goods; also transportation, labor, weighing, coopering and other charges and expenses in relation to such goods; and for the balance on any other accounts that may be due.

The property received by this receipt has NOT been insured by this company for the benefit of the depositor against fire or any other charges.

| DATE | W/R# |
|---|---|
| 4/17/20 | 1838 |

| | |
|---|---|
| VESSEL | E.R. LONDON |
| B/L # | ZIMUOSS8010559 |
| CONTAINER NUMBER | |
| DELIVERING CARRIER | |
| SEAL # | 3532060 |

| QUANTITY | DESCRIPTION | WEIGHT | DAMAGES & EXCEPTIONS |
|---|---|---|---|
| 63 DRUMS | HONEY<br>Exporter/Processor Lot#<br>TS seal# | 43,883 | |

STORAGE: COMMERCIAL: YES BONDED: _____

ENTRY # _____

NOT NEGOTIABLE

| THIS IS TO CERTIFY THAT WE HAVE RECEIVED FOR THE ACCOUNT OF: | The goods listed hereon in apparent good order, except as noted hereon (contents, conditions, and quality unknown), subject to all terms and conditions hereon and on the reverse hereof. Such property to be delivered to THE DEPOSITOR upon the payment of all storage, handling, and other charges. Advances have been made and liability incurred on these goods as follows. |
|---|---|
| Packer/Importer/Exporter or Processor | BY: _____<br>Authorized Signature |

| | 7.2.8 | Delivery Order (If Packer is stripping container) |
|---|---|---|

EXCELLENCE. SIMPLY DELIVERED.
Radix Group International Inc.
dba DHL Global Forwarding

850 Calcon Hook Road
Bays 9 - 16
Sharon Hill, PA 19079

**DELIVERY ADVICE**
Tel: 803-540-8600
Fax: 610-534-7880

FMC#00232 1 288

Importer/ Exporter/Processor

| DATE | OUR REF.NO |
|---|---|
| 4/09/20 | |

THE MERCHANDISE DESCRIBED BELOW WILL BE ENTERED AND FORWARDED AS FOLLOWS :

| IMPORTING CARRIER | LOCATION | FROM PORT OF ORIGINAL AIRPORT |
|---|---|---|
| E.R. LONDON 34E | PORT OF HOUSTON AUTHORITY BARBOURS<br>1515 E BARBOURS CUT BLVD<br>LA PORTE, TX 77571-3015<br>Tel: Fax: | |
| B/L OR AWB NO. / ARRIVAL DATE: 04/09/20 | | |

| LOCAL DELIVERY OR TRANSFER BY (DELIVERY ORDER ISSUED TO) | FREE TIME EXP. | ENTRY NO. | CUST.REF.NO |
|---|---|---|---|
| Tel:<br>Fax: | | | |

| FOR DELIVERY TO | ROUTE |
|---|---|
| Packer | |

| NO.OF PKGS. | DESCRIPTION OF ARTICLES, SPECIAL MARKS & EXCEPTIONS | WEIGHT | DO NOT USE |
|---|---|---|---|
| Drum | Container # | 87766 LB | |
| Qty | True Source Seal Number | 19905 | |
| | | 19905 | |

**INLAND FREIGHT** → PREPAID/COLLECT: Prepaid

RadixGrpInt DBA DHL GLBL FWDG
Agents for
Importer
PER

| | 7.2.9 | EA/LC-IRMS Report |
|---|---|---|

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Fax: +49 4292 40772 99

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eurofins

Eurofins Food Integrity Control Services GmbH · Berliner Straße 2 · D-27721 Ritterhude

Report date 26.02.2020

Page 1/2

## Analytical report

## Sample Code

**Sample name**
**Packaging**
**Origin**
**Product**
**Sampler**
**Reception temperature**
**Amount**
**Type of seal**
**Number sample tubes**
**Reception date time**
**Start / End of analysis**

## Test results

**Authenticity**

**THH26 C4/C3 Sugars in Honey (13C EA/LC-IRMS) (#)**
Method ICS SOP 520-13 (2019-10)

| | Result | Uncertainty | Unit |
|---|---|---|---|
| Delta 13C (Protein/VPDB) | | | ‰ |
| Delta 13C (Honey/VPDB) | | | ‰ |
| Delta 13C (Fructose/VPDB) | | | ‰ |
| Delta 13C (Glucose/VPDB) | | | ‰ |
| Delta 13C (Disaccharides/VPDB) | | | ‰ |
| Delta 13C (Trisaccharides/VPDB) | | | ‰ |
| Delta 13C (Oligosaccharides/VPDB) | | | ‰ |
| Delta 13C (F-G) | | | ‰ |
| Delta 13C (max.) | | | ‰ |
| Percentage of C4 sugar | | | % |
| Disaccharides rel. to total sugar content | | | % |
| Trisaccharides rel. to total sugar content | | | % |
| Oligosaccharides rel. to total sugar content | | | % |

he results of examination refer exclusively to the checked samples.
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urofins Food Integrity Control Services GmbH · Berliner Straße 2 · D-27721 Ritterhude
he place of execution and jurisdiction is Walsrode - lower district court Walsrode HRB 206819.
anaging Director: Dr. Kurt-Peter Raetzke
AT No.: DE301552986
ypovereinsbank SWIFT-BIC: HYVEDEMME17 IBAN: DE77 2073 0017 7008 0022 00

ur General Terms & Conditions, available upon request and online at
ttp://www.eurofins.de/lebensmittel/kontakt/avb.aspx, shall apply.

eurofins

| | | |
|---|---|---|
| F/G-ratio | 1.05 | (± 0.10) |

(#) = Eurofins Food Integrity Control Services is accredited for this test.

## Assessment

Assessment criteria for pure honey (Apidologie 39 (2008) 574-587):
Delta 13C (F-G): not higher than ± 1,0 ‰
Delta 13C (max): not higher than ± 2,1 ‰
C4 sugar (calculated): < 7 %
Oligosaccharides (related to total sugar content): not detected (n.d.) < 0.7 %

Remark:
n.a.: not analyzed, because n.d.
Values in brackets: expanded measurement uncertainty (F = 2.58; 99%).

Signature

Laborleiter

The results of examination refer exclusively to the checked samples.
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Eurofins Food Integrity Control Services GmbH · Berliner Straße 2 · D-27721 Ritterhude
The place of execution and jurisdiction is Walsrode - lower district court Walsrode HRB 206619.
Managing Director: Dr. Kurt-Peter Raetzke
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| | 7.2.10 | NMR Profiling |
|---|---|---|

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Niedersachsen
GERMANY

Tel: +49 4292 40772 00

[redacted]

[redacted]

[redacted]

Report date 07.02.2023
Page 1/2

**Analytical report** AR-23-TH-000986-01-AA0SG

**Sample Code** 296-2023-00000971

| | |
|---|---|
| Sample name | 37704 Ukraine, Sunflower |
| Packaging | Plastic cup |
| Sampler | Client |
| Origin | UKRAINE |
| Type | Sunflower |
| Number sample tubes | 1 |
| Type of seal | Without seal |
| Amount | approx.160 g |
| Reception temperature | room temperature |
| Reception date time | 30.01.2023 |
| Start / End of analysis | 30.01.2023 / 03.02.2023 |

**Test results**

**Authenticity**

AA0SG 1H-NMR profiling of honey (sugars, HMF, sugar acid)
Method Internal
Determination in a Eurofins laboratory accredited for the test

| | Result | Uncertainty | Unit |
|---|---|---|---|
| Fructose | 41.6 | (± 1.1) | g/100 g |
| Glucose | 38.4 | (± 1.0) | g/100 g |
| Fructose / Glucose | 1.08 | (± 0.10) | |
| Glucose+Fructose | 80.0 | (± 8.0) | g/100 g |
| Sucrose | <0.8 | | g/100 g |
| Turanose | 0.71 | (± 0.12) | g/100 g |
| 5-HMF | <5 | | mg/kg |
| Maltose | <300 | | mg/kg |
| Glycoxylsucrose | <20 | | mg/kg |
| Citric acid | 168 | (± 31) | mg/kg |
| Ethanol | <5 | | mg/kg |
| Acetic acid | <10 | | mg/kg |
| Lactic acid | 18 | (± 6) | mg/kg |
| Succinic acid | 17 | (± 4) | mg/kg |
| Proline | 383 | (± 46) | mg/kg |
| Botanical origin – Sunflower | 0.98 | | |
| Geographical origin – Ukraine | 1 | | |
| Spectral fingerprint | typical / not adulterated | | |

**Assessment**

The NMR profiling test did not reveal any sugar addition.

The spectral profile is in accordance with the model for the declared geographical origin ("UKRAINE")

| | 7.2.11 | HRMS Analysis |
|---|---|---|

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Eurofins Food Integrity Control Services GmbH · Berliner Straße 2 · D-27721 Ritterhude

Report date 26.02.2020

Page 1/1

## Analytical report

## Sample Code

**Sample name**
**Packaging**
**Origin**
**Product**
**Sampler**
**Reception temperature**
**Amount**
**Type of seal**
**Number sample tubes**
**Reception date time**
**Start / End of analysis**

## Test results

**Authenticity**

**THP01** **Honey Authenticity by LC-HRMS (#)**
Method ICS SOP 520-17 (2018-07), LC-Orbitrap-HRMS

| | Result | Uncertainty | Unit |
|---|---|---|---|
| Sugar syrup addition | | | |

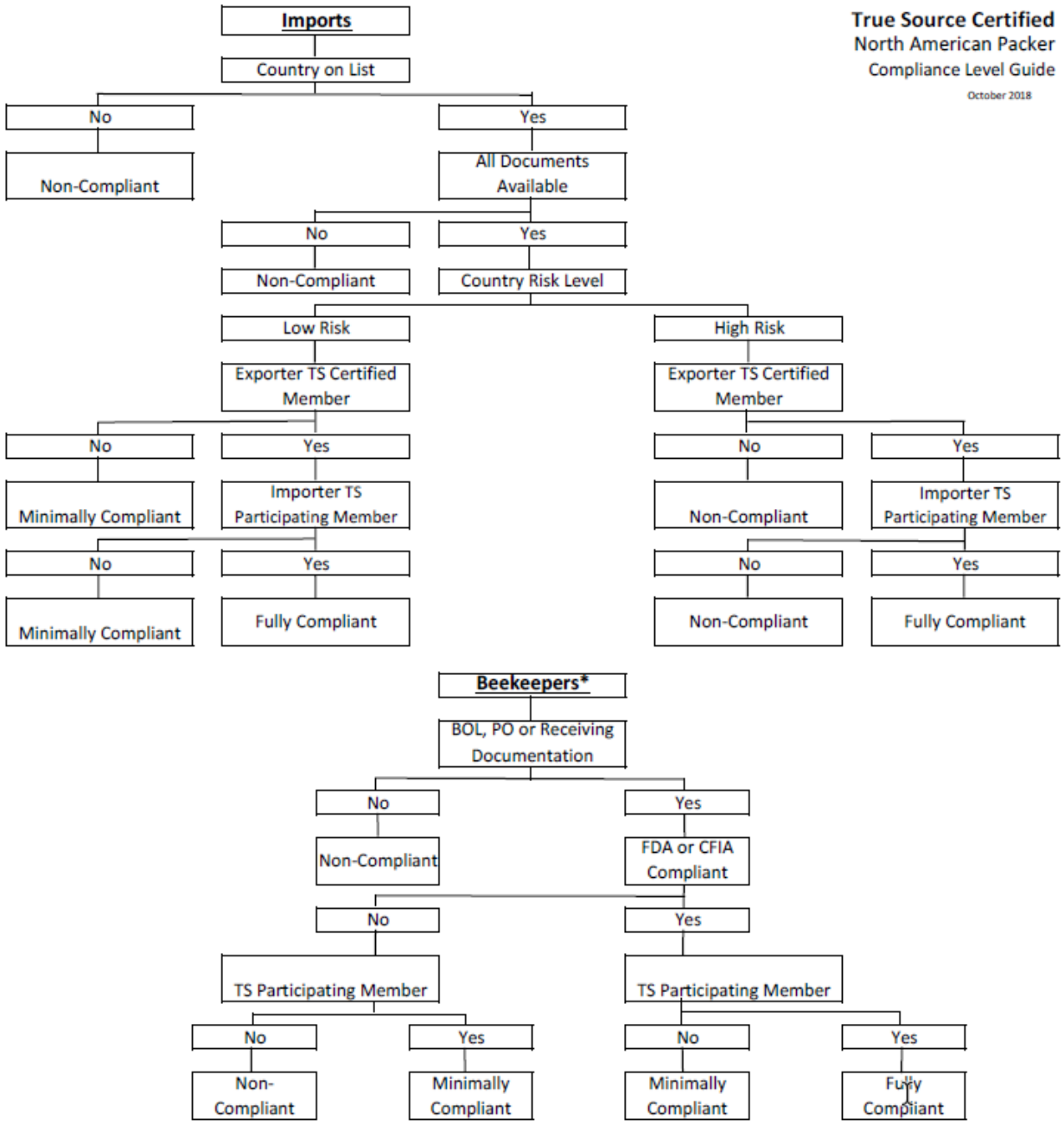
(#) = Eurofins Food Integrity Control Services is accredited for this test.

## Assessment

Signature

Laborleiter

| | 7.3.1 | **TSC Compliance Level Guide** |
|---|---|---|




*** Standards 4.1.1.1** 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