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True Source Certified® Standards **V8**

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

<b>Table of Contents</b>		<b>2</b>
	<b>Overview of True Source Certified®</b>	<b>3</b>
<b>Table 1</b>	<b>Table 1: Participants and their responsibilities</b>	<b>4</b>
<b>1</b>	<b>Background</b>	<b>5</b>
1.1	Reason True Source Honey was created	5
<b>2</b>	<b>True Source Certified Framework</b>	<b>5</b>
2.1	Governing Body	5
2.2	Terms and Definitions (Alphabetical)	5
2.3	Approved Countries for Export Certification	9
<b>Table 2</b>	<b>Current approved True Source Certified countries by risk level</b>	<b>9</b>
<b>3</b>	<b>Registration/Annual Fees</b>	<b>10</b>
3.1	Register for True Source Certified	10
3.2	Annual Fees	11
<b>Table 3</b>	<b>Importer/Merchant Exporter Annual Fees – Invoiced in Q1</b>	<b>11</b>
<b>Table 4</b>	<b>Processor/Exporter Annual Fees – Invoiced in Q2</b>	<b>11</b>
<b>Table 5</b>	<b>Packer/Brand Purchaser/Re-Packer/Co-Packer Annual Fees – Invoiced in Q3</b>	<b>11</b>
<b>4</b>	<b>Participating Companies (North American Beekeepers/ Importers/Merchant Exporters)</b>	<b>11</b>
4.1	Participation Certificate will be issued after registration and payment of fees	11
<b>5</b>	<b>Certified Companies (Processor/Exporter/Packer/Brand Purchaser/Co-Packer/ Re-Packer)</b>	<b>13</b>
5.1	Certification Requirements	13
<b>Table 6</b>	<b>True Source Load Certification Guidance</b>	<b>15</b>
<b>Table 7</b>	<b>North American Beekeeper Compliance Requirements</b>	<b>16</b>
5.3	Certification Audit for all Certified Companies	16
5.4	Document Audit Processors/Exporters	18
5.5	Audit and Certification Procedures	19
5.6	Report Reviews and Certification Decisions	19
5.7	Certificate Validity	19
5.8	Certification Decisions	20
5.9	Suspensions and Decertification	20
<b>6</b>	<b>Miscellaneous</b>	<b>21</b>
6.1	Confidentiality and Non-Disclosure	21
6.2	Complaints and Appeals	21
6.3	Collective Trademarks and Logos	21
<b>7</b>	<b>Authenticity Guidance for 3<sup>rd</sup> Party Auditors and True Source Honey Members</b>	<b>24</b>
7.1	Testing Variability and Root Cause Analysis	24
<b>Table 8</b>	<b>Authenticity Guidance for C3 Failures</b>	<b>24</b>
<b>8</b>	<b>Additional Information</b>	<b>25</b>
8.1	Approved Pollen Analysis, NMR or HRMS for Country of Origin verification Laboratories Please note this is only for Pollen Analysis and NMR geographical origin. EA/LC-IRMS and HRMS require an ISO certified lab for testing.	25
8.2	Examples of Required Documentation	26

## Overview of True Source Certified®

True Source Certified is a voluntary system of origin traceability and authenticity for participants in an international supply chain who wish to demonstrate through an independent 3<sup>rd</sup> Party Audit Firm that their sourcing practices for honey are in full compliance with requirements of the True Source Certified Standard. The basic responsibilities of each participant are as shown in Table 1.

True Source Certified has been developed under a unique framework that encourages honest, open participation and accountability to a wider community coupled with 3<sup>rd</sup> party oversight to validate individual performance and claims. Under this model, participants are able to maintain the integrity of the program and hold each other accountable to honest sourcing practices. While 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.

It is through the application of these standards and the involvement of an independent 3<sup>rd</sup> 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 Roles and Responsibilities**

<b>Participant</b>	<b>Responsibility</b>
<b>True Source Honey Management Group</b>	Establish and maintain the standards for certification Manage and maintain records of participants, fees and website. Issue True Source Certified Seals and maintain a record of seals issued to: Low-risk countries Certified Processors/Exporters and High-risk countries 3 <sup>rd</sup> Party Audit Firm. Handle questions or concerns by acting as mediator between participants and Board of Directors to help maintain anonymity.
<b>3rd Party Audit Firm</b>	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.
<b>Member Companies</b>	
<b>Participating Companies</b>	Non-audited participants, that are issued Certificates of Participation from the Management Group.
<b>North American Beekeepers</b>	Produce and sell authentic honey directly from their own operation
<b>Merchant Exporter</b>	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/Brand Purchasers Maintain a system of traceability and use the True Source Certified Seal Number for every load of honey Provide the required documentation to Importers or Packers related to the export of each load Never take physical possession of goods.
<b>Importers</b>	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 Never take physical possession of goods.
<b>Certified Companies</b>	
<b>Processors/Exporters</b>	Participants audited by 3 <sup>rd</sup> Party Audit Firm. Issued Certifications from 3 <sup>rd</sup> Party Audit Firm. Directly handle honey. 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) Owns and handles honey.
<b>Packers/Brand Purchasers</b>	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) Owns and handles honey.
<b>Certified Company Satellite Location</b>	Additional locations in North America owned and operated by a True Source Certified Packer. Required to go through separate certification. If location does not purchase honey only receiving and processing: Follows Co-Packer requirements. If location purchases honey separate from Certified company: Follows Packers/Brand Purchasers requirements.
<b>Re-Packers</b>	Maintain a system of traceability. Maintain a system to ensure honey authenticity (i.e. freedom from sugar/syrup adulteration) Purchases processed Honey from True Source Certified Packers/ Brand Purchasers. Owns and handles processed honey.
<b>Co-Packers</b>	Maintain a system of traceability. Maintain a system to ensure honey authenticity (i.e. freedom from sugar/syrup adulteration) Does not have ownership of product.

<b>1</b>	<b>Background</b>
<b>1.1</b>	<b>Reason True Source Honey was created</b>
1.1.1	<p>Food safety is dependent on authenticity and traceability with clear identification of the origins of food products entered into the United States. Without proper declaration of country of origin and authenticity testing, the task of assuring food safety becomes increasingly difficult and uncertain.</p> <p>True Source Honey firmly believes that consumers want authentic products that clearly identify the origin of the products they consume. True Source Certified was created to deliver just that – proven country of origin, fully traceable, 3<sup>rd</sup> party audited, 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 and qualified lab results. This program has been established under the name True Source Certified.</p> <p>The True Source Certified system combines 3<sup>rd</sup> party audits, random product sampling for qualified lab country of origin (COO) and authenticity testing, 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/Merchant Exporters, 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 3<sup>rd</sup> party auditors to sample for COO verification from a qualified lab and seal loads in the country of origin prior to shipment.</p>
<b>2</b>	<b>True Source Certified Framework</b>
<b>2.1</b>	<b>Governing Body</b>
	<p>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.</p>
<b>2.2</b>	<b>Terms and Definition in Alphabetical Order</b>
	<b>3<sup>rd</sup> Party Audit Firm (audit firm):</b> An independent audit firm which has been contracted by True Source Honey LLC to manage the certification and auditing of True Source Certified.
	<b>3<sup>rd</sup> Party Auditor (auditor):</b> An individual employed by the contracted audit firm for the purpose of evaluating if the Certified Company can demonstrate adherence to the True Source Certified Standard.
<b>A.</b>	<b>Advertising Use:</b> Any images, documents, signs, labels, containers or other items used to directly promote the sale of a product.
	<b>Aggregator/Collector:</b> Intermediary companies that source honey from Beekeepers and then sell to Processor/Exporters.
	<b>Announced Annual Audit:</b> A scheduled audit for Packers/Brand Purchasers, Co-Packers/Re-Packer and Processor/Exporters that occurs on an annual basis.
	<b>Annual Audit:</b> Once a company achieves certification, they will be subject to either an-announced annual or unannounced annual audit. An annual audit is similar to the Certification Audit in content, but it checks for records from the last calendar year. It is an audit for continuation of True Source Certification.
	<b>Approved Country:</b> Any country with an established history of commercial honey production and export, which meets the criteria established by the TSH Board of Directors.

	<p><b>Authentic/Authenticity:</b> 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 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.</p>
B.	<p><b>Beekeeper:</b> Primary producer with direct ownership or control of honey production (bee hives).</p>
	<p><b>Brand Purchaser:</b> A company in North America that is involved in the purchase, ownership, and handling 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.</p>
	<p><b>Bulk Plant/Factory:</b> A company located outside the United States operating a processing and warehousing facility where honey is received, tested, classified and may be processed in preparation for bulk packaging (drums/totes) and export to foreign markets.</p>
C.	<p><b>Certificate of Certification:</b> Certificate in a format provided by the audit firm and issued to North American Packers/Brand Purchasers/Co-Packers/Re-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.</p>
	<p><b>Certificate of Participation:</b> Certificate in a format provided by True Source Honey, LLC and issued to Merchant Exporters/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.</p>
	<p><b>Certification Audit:</b> 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.</p>
	<p><b>Certification Trademarks:</b> Means the letters and words “True Source Honey” and “True Source Certified” and the logo depicted in True Source “Terms of Use”.</p>
	<p><b>Certification:</b> Confirmation by the 3<sup>rd</sup> party Audit Firm of the compliance to the True Source Certified Standards by Packers and Processor/Exporters.</p>
	<p><b>Certified Company: Packer/Brand Purchaser/Co-Packer/Re-Packer</b> 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. If a Certified Company has satellite locations, they must go through separate certification.</p>
	<p><b>Certified Company Satellite location:</b> Additional locations in North America that are owned and operated by a True Source Certified Packer. If Satellite location purchases honey separate from Certified Company, they must go through a Packer audit. If satellite location does not purchase honey but just receives and processes True Source honey purchased through a corporate entity, it needs only a co-packer audit.</p>

	<p><b>Certified Co-Packer:</b> A Certified Company which packages product for another honey company without direct ownership of the product. Certified Packers with multi-site operations can designate a main facility as the Certified Packer, and remote facilities as Co-Packers for the purpose of audits if the main facility executes all purchasing functions. If remote facilities conduct separate purchasing activities, they must be audited under the Certified Packer standard. Certification will not be granted to an uncertified honey company that has not successfully passed a full True Source Certified Co-Packer/Re-Packer Audit. True Source Certified trademarks and logos cannot be used on co-packed products 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. Can only Co-Pack True Source Certified Honey.</p>
	<p><b>Certified Re-Packer:</b> A Certified Company which re-packages processed honey purchased from a True Source Certified Packer. Certification will not be granted to an uncertified honey company that has not successfully passed a full True Source Certified Co-Packer/Re-Packer Audit. True Source Certified trademarks and logos cannot be used on re-packed products unless Packer/Brand Purchaser has achieved full True Source Certified Packer/Brand Purchaser certification prior to sale. 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.</p>
	<p><b>Certified Load:</b> 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 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.</p>
	<p><b>Collector/Collection Center:</b> 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 an Exporter audit. An employed agent of the Exporter who simply transfers honey from the Beekeepers to the Exporter is not considered a collector.</p>
	<p><b>Collective Membership Trademark:</b> Letters and words “True Source”.</p>
	<p><b>Collective Trademarks:</b> Letters and words “True Source Honey” and the logos depicted in True Source “Terms of Use”.</p>
	<p><b>Company:</b> For the purpose of this document, company includes cooperative, partnership, joint venture, business, or other organizations.</p>
	<p><b>Co-Packer:</b> An entity which packages products without direct ownership. May be subject to facility audit as an extension of a Packer Audit. Certification 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 products unless full True Source Certified Co-Packer certification has been achieved by all Co-Packers of the logo-bearing product.</p>
	<p><b>CFIA:</b> 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.</p>
E.	<p><b>EA/LC-IRMS:</b> 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 possible adulteration.</p>
	<p><b>Economic Adulteration:</b> 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.</p>

F.	<b>Falsification of Records:</b> Any falsification of records is considered a critical nonconformance and will result in immediate loss of certification.
	<b>FDA Food Safety Modernization Act (FSMA):</b> Aims to strengthen the food safety system by focusing on preventing food safety problems rather than reacting to them after they occur. It gives the Food and Drug Administration (FDA) more authority to oversee and enforce supply chains, affecting businesses that must register with the FDA.
	<b>Filtration:</b> 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. See also Straining.
	<b>Freight Forwarder/Logistics Broker:</b> Entity facilitating logistics within the supply chain that does not physically possess products at any time.
	<b>Full Calendar Year:</b> January 1 <sup>st</sup> through December 31 <sup>st</sup> .
H.	<b>Honey:</b> 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 honeycomb to ripen and mature. Honey may not contain or be combined with foreign sugars and maintain the designation Honey as defined in this document.
	<b>HRMS:</b> Uses the LC (Liquid chromatography)-HRMS (high resolution mass spectrometry) technique. Detects sugar syrup markers which are not naturally occurring 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.	<b>Importer:</b> A company that purchases honey from a Processor/Exporter or Freight Forwarder/Logistics Broker or Merchant 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/Brand Purchasers.
L.	<b>LTL:</b> Less than truckload quantity. Partial shipment or container load. Must meet True Source Certified Standards for full traceability and identification.
M.	<b>Manufacturer:</b> A company that purchases honey from a Certified Packer in order to use honey as an ingredient in the manufacture of food or non-food items as a functional or perceived enhancement to the product. Made with True Source Certification is required for use of the MWTSH logo.
	<b>Member Company:</b> Certified Companies and Participating Companies.
	<b>Merchant Exporter:</b> 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) completing the necessary export documentation, (3) selling or transferring the honey to Importers or Packers/Brand Purchasers. (4) Never takes physical possession of goods.
N.	<b>NMR:</b> 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.)
	<b>Non-Advertising Use: Means</b> 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.	<b>Packer:</b> 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.
	<b>Participating Company:</b> A North American Beekeeper or an Importer who retains a Certificate of Participation.
	<b>Processor/Exporter:</b> A company located outside North America that operates a Bulk Plant/Factory for purposes of preparing honey for export.
Q.	<b>Qualified Laboratory:</b> A testing laboratory that has ISO 17025 certification for the required testing protocols.



<b>R.</b>	<b>Re-Packer:</b> 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.
<b>S.</b>	<b>SADER/SENASICA:</b> The Secretariat of Agriculture and Rural Development is Mexico's agriculture ministry.
	<b>Standards:</b> Means the rules and procedures contained in this document, and include the TSH Operating Agreement and any modification, variation, or replacement of these documents.
	<b>Straining:</b> 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.
	<b>Surveillance Inspection:</b> 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.
<b>T.</b>	<b>TSH:</b> Means True Source Honey, LLC, a District of Columbia not-for-profit organization, having its principal offices at 19 Mantua Road, Mount Royal, NJ 08061.
	<b>Traceability Document:</b> Document containing pertinent information to trace from country of origin to packer/brand purchaser or a document from packer/brand purchaser to co-packer/re-packer to trace transfer or sale of honey.
	<b>True Source Annual Fee:</b> 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.
	<b>True Source Certified Seal:</b> A seal bearing the unique True Source Certified identifying number, applied to a certified full ocean container load.
	<b>True Source Certified Standards:</b> A voluntary traceability system which enables a certified company to validate their compliance through the use of a 3 <sup>rd</sup> party auditor.
<b>U.</b>	<b>Unannounced Annual Audit:</b> 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.
<b>2.3</b>	<b>Approved Countries for Export Certification</b>
<b>2.3.1</b>	<b>Approval Criteria-Current Exporting Countries</b>
	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 are 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.

<b>Table 2</b>		<b>Current approved True Source Certified countries by risk level</b>			
		<b>Low-Risk*</b>	<b>High-Risk**</b>		
		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	
2.3.1.5.1	* Additional requirements may be applicable to High and Low-Risk Countries.				
2.3.1.5.2	** High-Risk Countries: 3 <sup>rd</sup> party audit firm supervises container loading and sampling.				
<b>2.3.2</b>	<b>Risk Level- Current Exporting Countries</b>				
	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.				
<b>2.3.3</b>	<b>New Exporting Countries – High-Risk</b>				
	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	<p>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.</p> <p>If satisfactory official documentation is not provided, the request for inclusion on the approved countries list may be denied.</p>				
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.				
<b>3</b>	<b>Registration/Annual Fees</b>				
<b>3.1</b>	<b>Register for True Source Certified</b>				
<b>3.1.1</b>	<b>North American Beekeepers/Importers/Merchant Exporters (Participating Companies)</b>				
3.1.1.1	Complete a registration form ( <a href="http://www.truesourcehoney.com">www.truesourcehoney.com</a> ) and submit the form and registration fee to True Source Honey.				

3.1.1.2	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/Brand Purchaser. Registration is required every 3 years.																				
3.1.1.2.1	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.																				
<b>3.1.2</b>	<b>Packers/Brand Purchasers/Co-Packers/Re-packers/Processors/Exporters (Certified Companies)</b>																				
3.1.2.1	Complete registration from 3 <sup>rd</sup> Party Auditor																				
3.1.2.2	Complete the pre-certification questionnaire or any applicable pre-certification requirements issued by the audit firm prior to the first audit. Include all requested documentation.																				
3.1.2.3	<p>3<sup>rd</sup> Party Auditor will now 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 Certified Companies are eligible to have audit scheduled. 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.</p> <p>Auditors must be given full access to all areas of any property subject to inspection. This includes but is not limited to all physical structures and rooms therein that appear to be associated with the facility subject to inspection. Auditors cannot be restricted from inspecting any area or physical structure even if such a structure or area is declared owned or leased to another entity if that structure or area could reasonably serve as a storage or processing area related to the property subject to inspection. Auditors must also be given permission to sample for testing, if required. Failure to permit access or to allow required sampling shall result in immediate audit failure and termination of any existing certification. There shall be no recourse or appeal for such an audit failure.</p>																				
<b>3.2</b>	<b>Annual Fees</b>																				
<b>3.2.1</b>	<b>North American Beekeepers: Triennial fee of \$150. Invoiced on anniversary of joining True Source.</b>																				
<b>Table 3</b>	<b>Importer/Merchant Exporter Annual Fees – Invoiced in Q1</b>																				
	<table border="1"> <thead> <tr> <th>Number of containers/truckloads imported/exported into the US per year</th> <th>Annual Fee</th> </tr> </thead> <tbody> <tr> <td>0-100</td> <td>\$1,725</td> </tr> <tr> <td>101-200</td> <td>\$3,540</td> </tr> <tr> <td>201-300</td> <td>\$5,175</td> </tr> <tr> <td>301-400</td> <td>\$6,900</td> </tr> <tr> <td>401-500</td> <td>\$8,625</td> </tr> <tr> <td>501-750</td> <td>\$10,350</td> </tr> <tr> <td>751-1000</td> <td>\$12,075</td> </tr> <tr> <td>1001-1500</td> <td>\$13,800</td> </tr> <tr> <td>1501+</td> <td>\$15,525</td> </tr> </tbody> </table>	Number of containers/truckloads imported/exported 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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<b>Table 4</b>	<b>Processor/Exporter Annual Fees – Invoiced in Q2</b>																				
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<b>Table 5</b>		<b>Packer/Brand Purchaser/Re-Packer/Co-Packer Annual Fees – Invoiced in Q3</b>	
		<b>Pounds Processed/Handled</b>	<b>Annual Fee (USD)</b>
		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
<b>4</b>	<b>Participating Companies (North American Beekeepers/ Importers/Merchant Exporters)</b>		
<b>4.1</b>	<b>The Participation Certificate will be issued after registration and payment of fees. However, the following must also be met for each participating company according to role to fulfill membership.</b>		
<b>4.1.1</b>	<b>North American Beekeepers</b>		
4.1.1.1	Do not import honey for resale (importation for resale would require classification as a Processor/Exporter or Packer and the associated audit).		
4.1.1.2	Produce and sell honey in accordance with the FDA Food Safety Modernization Act or other relevant governing body with jurisdiction.		
4.1.1.3	Each load must be accompanied by a Traceability Document containing the following information:		
4.1.1.3.1	<ul style="list-style-type: none"> <li>a. MUST: <ul style="list-style-type: none"> <li>a. Country of Origin</li> <li>b. Drum Count</li> <li>c. Weight</li> </ul> </li> <li>b. MAY INCLUDE: <ul style="list-style-type: none"> <li>a. Beekeeper name and address and True Source Number</li> <li>b. Purchaser name and address</li> <li>c. If purchaser is a Participating Importer their name and address</li> </ul> </li> </ul>		
4.1.1.4	Country Specific requirements		
4.1.1.4.1	Canadian Beekeepers must meet all CFIA regulations when selling to a Processor/Exporter or Packer/Brand Purchaser in order to be considered fully compliant.		
4.1.1.4.2	Mexican Beekeepers must meet all SADER/SENASICA requirements when selling to a Processor/Exporter or Packer/Brand Purchaser in order to be considered fully compliant.		
<b>4.1.2</b>	<b>Importer/Merchant Exporter</b>		
4.1.2.1	Understand the requirements for Fully Compliant, Minimally Compliant and Non-Compliant loads. See Section 5.2.1.2.2 and Tables 6 and 7.		
4.1.2.2	Purchase Honey from Approved Countries for Certified Transactions (see Table 2, Approved Countries).		
4.1.2.3	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 aside from North American over the road (OTR) shipments. (Minimally compliant loads do not require the use of the seal number -Tables 6 and 7).		
4.1.2.4	Maintain the following required documents for each load from a North American Beekeeper/Processor/Exporter to Packer/Brand Purchaser according to True Source Certified® Standards. (See section 5.1.2.1 for additional requirements) (See section 8.2 examples)		
4.1.2.4.1	Low and High Risk		

4.1.2.4.1.1	Traceability Document contains the following information:
	<ul style="list-style-type: none"> <li>a. MUST: <ul style="list-style-type: none"> <li>a. Country of Origin</li> <li>b. Drum Count</li> <li>c. Weight</li> <li>d. True Source Seal number</li> </ul> </li> <li>b. MAY INCLUDE: <ul style="list-style-type: none"> <li>a. Processor/Exporter name and True Source number</li> <li>b. Container number</li> <li>c. Exporter Lot number</li> </ul> </li> </ul>
4.1.2.4.3	High-Risk Shipments
	Load Inspection Report issued by 3 <sup>rd</sup> Party Audit Firm must contain the following information:
	<ul style="list-style-type: none"> <li>a. Container number</li> <li>b. Exporter Lot number</li> <li>c. True Source Seal number</li> </ul>
4.1.2.4.4	True Source Certified honey loses certification status if sold to a non-True Source Certified Packer or non-True Source entity.
	<ul style="list-style-type: none"> <li>a. Importers/Merchant Exporters are required to fully inform non-True Source Packers and non-True Source entities of status change.</li> <li>b. Importers/Merchant Exporters shall not misrepresent status or sell honey as True Source Certified to any non-True Source Packer or non-True Source entity.</li> <li>c. Failure to inform of status change, or misrepresentation of status, will cause immediate suspension of Importer/Merchant Exporter participation in the True Source program.</li> </ul>
<b>5</b>	<b>Certified Companies (Processor/Exporter/Packer/Brand Purchaser/Co-Packer/ Re-Packer)</b>
<b>5.1</b>	<b>Certification Requirements</b>
<b>5.1.1</b>	<b>Maintain a system of Authenticity</b>
5.1.1.1	Maintain a written protocol in identifying the process to ensure honey is not economically adulterated including a risk analysis and preventive measures if applicable.
5.1.1.2	Packer/Brand Purchaser is responsible for conducting the following analysis and making the report available for inspection during an audit: <ul style="list-style-type: none"> <li>a. EA/LC-IRMS Report: From a qualified laboratory.</li> <li>b. HRMS Report: From a qualified laboratory.</li> <li>c. (See section 7 for additional guidance)</li> </ul>
<b>5.1.2</b>	<b>Maintain a system of Traceability</b>
5.1.2.1	All imported shipments must clearly label all individual drums within each certified load as follows for traceability up to processing at Packer/Co-Packer: <ul style="list-style-type: none"> <li>a. Product: Honey</li> <li>b. Country of Origin</li> <li>c. Exported by: Processor/Exporter name and address</li> <li>d. Imported by: Importer name and address</li> <li>e. True Source Certified® ID number</li> <li>f. Lot number (as per Processor/Exporter traceability system)</li> <li>g. Drum number</li> <li>h. Gross, Tare, Net weight (if not included in shipping documents)</li> </ul>
5.1.2.2	<b>Co-Packer/Re-Packer/Packer/Brand Purchaser</b>
5.1.2.2.1	Clearly identify all shipments of honey that arrive to or are shipped from the plant.
5.1.2.2.2	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.
5.1.2.3	<b>Packer/Brand Purchaser additionally must verify country of origin for all countries.</b>

5.1.2.3.1	Test and retain a laboratory report stating the country of origin for each certified load using either NMR, HRMS or Pollen Analysis, conducted by a qualified lab. The Certification Body will verify the origin/traceability of randomly selected loads during an audit using the Seal Database. Seals are added to the Seal Database when True Source issues load seals to individual Processor/Exporters in low-risk countries or when the Certification Body issues seals in high risk countries. The declared origin of the load must be confirmed by the database.
5.1.2.4	<b>Processor/Exporter</b>
5.1.2.4.1	Include records of all purchases from Beekeepers and collectors.
5.1.2.4.2	Identify individuals responsible for traceability and authenticity utilizing descriptions of responsibilities or an organizational chart
5.1.2.4.3	Risk Assessment: Identify potential risks and preventative measures used to ensure traceability.
5.1.2.4.4	Include in the system of traceability an 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. <ul style="list-style-type: none"> <li>a. System to include a written recall program</li> <li>b. System to include annual mock recall exercise</li> </ul>
5.1.2.4.5	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.
5.1.2.4.6	Each certified load must be sealed using a True Source Certified® Seal.
5.1.2.4.7	High-Risk countries only, – the audit firm will randomly sample drums prior to shipment and supervise container loading and seal the load using a True Source Certified® Seal providing a Load Inspection Report.
<b>5.1.3</b>	<b>Maintain required documentation for every purchase shipment of raw honey.</b>
5.1.3.1	<b>Co-Packer</b>
5.1.3.1.1	Traceability Document which must contain the following:
5.1.3.1.1.1	<ul style="list-style-type: none"> <li>a. Packer who owns honey’s name and address and True Source Number</li> <li>b. Identifier that can be traced by both Co-Packer and Packer/Brand Purchaser</li> <li>c. Drum Count</li> <li>d. Weight</li> <li>e. Country of Origin</li> </ul>
5.1.3.2	<b>Re-Packer</b>
5.1.3.2.1	Traceability Document which must contain the following:
5.1.3.2.1.1	<ul style="list-style-type: none"> <li>a. Seller’s (Packer/Brand Purchaser) name and address and True Source Number</li> <li>b. Purchasers (Re-Packer) name and address and True Source Number</li> <li>c. Weight</li> </ul>
5.1.3.3	<b>Processor/Exporter/Packer/Brand Purchaser</b>
5.1.3.3.1	Low and High Risk
5.1.3.3.1.1	Traceability Document containing the following information: <ul style="list-style-type: none"> <li>a. MUST INCLUDE: <ul style="list-style-type: none"> <li>a. Country of Origin</li> <li>b. Drum Count</li> <li>c. Weight</li> <li>d. True Source Seal number</li> </ul> </li> <li>b. MAY INCLUDE: <ul style="list-style-type: none"> <li>a. Beekeeper/Processor/Exporter name and address and True Source Number</li> <li>b. Purchaser name and address</li> <li>c. If purchaser is a Participating Importer their name and address</li> <li>d. Container number</li> </ul> </li> <li>c. Exporter Lot number</li> </ul>

5.1.3.3.2	High-Risk Shipments
5.1.3.3.2.1	Load Inspection Report issued by 3 <sup>rd</sup> Party Audit Firm must contain the following information: <ul style="list-style-type: none"> <li>a. Container number</li> <li>b. Exporter Lot number</li> <li>c. True Source Seal number</li> </ul>
<b>5.1.4</b>	<b>Unannounced Sampling/Inspections</b>
5.1.4.1	<b>Co-Packer/Re-Packer/Packer/Brand Purchaser</b>
5.1.4.1.1	Allow entry to Audit Firm for unannounced sampling.
5.1.4.1.1.1	<ul style="list-style-type: none"> <li>a. If sampling results reveal that the Certified Member is out of compliance with Standards, True Source Certification may be revoked.</li> <li>b. A Certified Company is subject to random unannounced sampling of honey at any time after initial certification.</li> <li>c. True Source Certified has discretion to select and coordinate sample collection from Co-Packer/Re-Packer/Packer/Brand Purchaser facilities and the supplying Beekeepers.</li> <li>d. True Source Certified has discretion to select the type(s) of analysis performed by qualified Laboratories as specified in Section 8 of this Standard.</li> <li>e. True Source Certified is financially responsible for random unannounced sampling when unrelated to a Certified Audit.</li> <li>f. A Certified Company may lose True Source Certification based on analysis indicating deviation from the True Source Certified Standards by unverifiable country of origin (excludes re-Packer) or evidence of adulteration.</li> <li>g. Auditor will verify Container True Source Seal was issued to exporter from the country of origin via the True Source Seal Database. True Source Container Seal may need to be requested from supplier for Co-Packer and Re-Packers.</li> </ul>
5.1.4.2	Processor/Exporter are subject to random unannounced Surveillance Inspections to include sampling of honey at any time after initial certification.
5.1.4.2.1	<ul style="list-style-type: none"> <li>a. True Source Certified has discretion to select and coordinate inspections and sample collection from Processor/Exporter facilities.</li> <li>b. Analysis of samples collected during Surveillance Inspections must align with the processor/Exporters testing protocol- see Section 5.1.1</li> <li>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.</li> <li>d. Any lots not intended for sale to the True Source Certified Clients must be clearly identified and are not subject to authenticity analysis.</li> <li>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.</li> <li>f. True Source Certified is financially responsible for random unannounced inspections and sampling when unrelated to a Certified Audit.</li> </ul>
5.1.4.2.2	Processor/Exporters may lose True Source Certification based on analysis indicating deviation from the True Source Certified Standards
<b>5.1.5</b>	<b>Successfully complete audit by 3rd Party Audit Firm.</b>
<b>5.2</b>	<b>Certified Company specific membership role requirements</b>
<b>5.2.1</b>	<b>Packer/Brand Purchaser</b>
5.2.1.1	Purchase Honey from Approved Countries see Table 3.
5.2.1.2	Meet the True Source Percentage Requirements
5.2.1.2.1	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 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.



5.2.1.2.2	90% of any Certified Packers sourcing must be considered Fully Compliant. Non-compliant loads cannot exceed 5%.															
<b>Table 6</b>	<b>True Source Load Certification Guidance</b>															
	<table border="1"> <tr> <td data-bbox="308 205 565 653" rowspan="5"> <b>Fully Compliant Load:</b>             90% of sourcing must be fully compliant         </td> <td data-bbox="565 205 1568 268">The Processor/Exporter must have successfully completed a Certification Audit and all subsequent Annual Audits.</td> </tr> <tr> <td data-bbox="565 268 1568 300">The Importer must be a registered participant with True Source Certified.</td> </tr> <tr> <td data-bbox="565 300 1568 506">           North American Beekeeper selling directly to North American Packer/Brand Purchaser (excludes North American Beekeeper producing less than 40,000 pound per year, which are considered fully compliant) must be:           <ul style="list-style-type: none"> <li>○ Registered with True Source</li> <li>○ Canadian Beekeepers must meet the export requirements of the CFIA</li> <li>○ Mexican Beekeepers must meet the export requirements of the SADER/SENASICA</li> </ul> </td> </tr> <tr> <td data-bbox="565 506 1568 569">The Packer/Brand Purchaser must have successfully completed a Certification Audit and all subsequent Annual Audits. 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<b>Non-Compliant Load:</b>  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 5.2.1.2.2 will cause a participant to lose their certification.															



<b>Table 7</b>		<b>North American Beekeeper Compliance Requirements</b>										
		<table border="1"> <tr> <td rowspan="3">Fully Compliant Load:</td> <td><b>North American</b> Beekeeper registered with True Source <b>if produces more than 40,000 lbs. per year.</b></td> </tr> <tr> <td><b>North American</b> 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; and Mexican Beekeepers must meet all SADER/SENASICA requirements.</td> </tr> <tr> <td>Each load must be accompanied by a Bill of Lading (BOL) with <b>North American</b> Beekeeper and Purchasers name &amp; address, drum count and weight and COO. If the purchaser is a participating Importer, the participating Importer name &amp; address must also appear on the BOL with the <b>North American</b> Beekeeper and Purchaser.</td> </tr> <tr> <td rowspan="2">Minimally Compliant Load:</td> <td><b>North American</b> 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, and Mexican Beekeepers must meet all SADER/SENASICA requirements.</td> </tr> <tr> <td>Each load must be accompanied by a Bill of Lading (BOL) with <b>North American</b> Beekeeper and Purchasers name &amp; address, drum count and weight and COO. If the purchaser is a participating Importer, the participating Importer name &amp; address must also appear on the BOL with the <b>North American</b> Beekeeper and Purchaser.</td> </tr> <tr> <td>Non-Compliant Load:</td> <td>A load of honey not meeting the Minimally or Fully compliant requirements is non-compliant.</td> </tr> </table>	Fully Compliant Load:	<b>North American</b> Beekeeper registered with True Source <b>if produces more than 40,000 lbs. per year.</b>	<b>North American</b> 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; and Mexican Beekeepers must meet all SADER/SENASICA requirements.	Each load must be accompanied by a Bill of Lading (BOL) with <b>North American</b> Beekeeper and Purchasers name & address, drum count and weight and COO. If the purchaser is a participating Importer, the participating Importer name & address must also appear on the BOL with the <b>North American</b> Beekeeper and Purchaser.	Minimally Compliant Load:	<b>North American</b> 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, and Mexican Beekeepers must meet all SADER/SENASICA requirements.	Each load must be accompanied by a Bill of Lading (BOL) with <b>North American</b> Beekeeper and Purchasers name & address, drum count and weight and COO. If the purchaser is a participating Importer, the participating Importer name & address must also appear on the BOL with the <b>North American</b> 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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<b>5.2.2</b>	<b>Processor/Exporter</b>											
5.2.2.1	Exporters may purchase up to 50% of their volume from one collector and/or up to 10% from non-certified Exporters.											
	<ul style="list-style-type: none"> <li>a. The collector and/or non-certified Exporters must be visited by the auditor as part of the certification audit process.</li> <li>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.</li> </ul> <p>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.</p>											
5.2.2.2	<p>Shared Facilities: If multiple Processor/Exporters share a facility/physical location or if a Certified Processor/Exporter contracts with a 3<sup>rd</sup> party to prepare loads for export, each entity must undergo a separate certification audit and be individually registered with True Source. For example: Company A is a Processor/Exporter and is certified. Company B contracts with Company A to use their facility to receive, sample/test and prepare outbound shipments. Both companies act as Processor/Exporters but share the physical location. Both companies must undergo a certification audit. If non-certified companies are operating out of the facility, all lots not owned or intended for use by the certified companies must be clearly identified and are not subject to authenticity analysis.</p>											
<b>5.3</b>	<b>Certification Audit for all Certified Companies</b>											
<b>5.3.1</b>	<b>The Certification Audit will evaluate the Certified Company against their ability to adhere to True Source Certified standards. The following elements will be key components of the audit.</b>											
5.3.1.1	Evaluate the system of traceability, maintenance of required records, purchase transactions and practice within the facility. Initial clients are subject to an audit on the past six months of records, while pre-certified clients will be audited to the last calendar year.											

5.3.1.2	Twelve consecutive months of active facility operations, blending, processing, and repackaging raw honey must occur prior to any scheduled audit. This restriction does not apply to certified companies seeking to open new facilities under the same ownership and management, they can be audited once operational.
5.3.1.2.1	Certified Companies who operate seasonally should be considered eligible for audits without 12 consecutive months' activity. They must have proof of multi-year seasonal activity.
5.3.1.2.2	Certified Companies who purchase another certified company can operate under the purchasing company's certification unless the Certification Role, or operating process has changed.
5.3.1.3	Initial Audit
5.3.1.3.1	<b>Co-Packer/Re-Packer/Packer/Brand Purchaser</b> A minimum of 6 months' purchasing history must be provided to confirm required compliant load percentages have been met unless noted otherwise in 5.3.1.2 and 5.3.1.2.1.
5.3.1.3.2	<b>Processor/Exporter</b> 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.
5.3.1.4	Collection of random samples of unprocessed honey
5.3.1.4.1	Collect random samples of unprocessed or in process (Processor/Exporter) honey inventory to submit for testing to a qualified laboratory to compare against stated origin (Pollen Analysis or NMR or HRMS) and verify authenticity test results with same method and qualified labs the Certified Company used. See Section 7 for additional guidance.  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.
5.3.1.4.2	Sample Collection Notes (Co-Packer, Re-Packer, Packer, Brand Purchaser, Processor/Exporter)  <ul style="list-style-type: none"> <li>a. 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 (except Re-Packer.)</li> <li>b. All samples collected will be tested by both EA-LC/IRMS and HRMS for authenticity. They must also pass COO verification from a qualified lab by one of the following tests: NMR, HRMS or pollen analysis (except Re-Packer.) All samples must be tested at the same qualified lab as selected in advance by the client. All samples may go to a single qualified lab as directed by the client.</li> <li>c. All honey at the facility must be accessible for random sampling and analysis of origin and must contain sufficient pollen to permit determination of country of origin. All honey in inventory, or in process (Processor/Exporter), is subject to origin sampling.</li> <li>d. 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.</li> </ul>
5.3.1.4.3	Additional notes for Processor/Exporter  <ul style="list-style-type: none"> <li>a. Any lots not intended for sale to True Source Certified Clients must be clearly identified and are not subject to authenticity analysis.</li> <li>b. If there are no lots available for testing that are intended for sale to True Source Certified Clients, samples shall be collected from any other lot, even if not intended for sale to True Source Certified Clients.</li> </ul>
5.3.1.5	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.

5.3.1.6	Certified Company will maintain and demonstrate a system to ensure honey authenticity (i.e., freedom from sugar/syrup adulteration) Samples collected and tested must validate the ability of the Certified Company to source, test and prepare for sale, honey that meets criteria for authenticity and country of origin. If samples fail testing, the facility cannot become certified or maintain current certification. See Section 7 for additional guidance. At a minimum system must include:
5.3.1.6.1	<b>Packer/Brand Purchaser</b> <ul style="list-style-type: none"> <li>a. A qualified laboratory must complete the authenticity testing protocols.</li> <li>b. All loads of honey received by a Packer from a Beekeeper/Exporter/Importer must be analyzed by the Packer to ensure honey authenticity by means of EA/LC-IRMS and HRMS. Qualified laboratory results must be available for review and be traceable to the load in question.</li> <li>c. North American suppliers (Beekeepers) who produce not more than 30,000 lbs annually are exempt from testing upon receipt at Packers.</li> <li>d. If a load is received composed of multiple lots from different suppliers, each supplier lot must be tested separately unless the individual supplier is exempt from testing.</li> <li>e. 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.</li> </ul>
5.3.1.6.2	<b>Processor/Exporter</b> <ul style="list-style-type: none"> <li>a. A qualified laboratory must complete the testing protocols</li> <li>b. Acceptable forms of analysis must evaluate the C3 and C4 content of the honey. The current methodology that meets these expectations includes: EA/LC-IRMS and HRMS.</li> </ul>
5.3.1.7	Supplier Assessment
5.3.1.7.1	<b>Co-Packer/Re-Packer</b> Select one or more Packers at random to participate in a Supplier Assessment to confirm stated volumes of packing.
5.3.1.7.2	<b>Packer/Brand Purchaser</b> Select one or more suppliers at random to participate in a Supplier Assessment to confirm stated volumes of purchase through phone interviews
5.3.1.7.3	<b>Processor/Exporter</b> 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).
5.3.1.8	Annual Audit: Once a Certified Company 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 qualified labs the Certified Company used and raw testing to confirm the 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 5.1.4, Certified Companies are subject to random unannounced sampling of honey at any time after initial certification. Certified Companies may lose True Source Certification based on analysis indication deviation from the True Source Certified Standards.
5.3.1.9	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.
5.3.1.10	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 when applicable.

<b>5.4</b>	<b>Document Audit Processors/Exporters</b>
	<ul style="list-style-type: none"> <li>a. Traceability and authenticity programs and process flow charts for raw materials through processing to shipment.</li> <li>b. Purchase and sales transactions including approved supplier lists with complete contact information.</li> <li>c. Shipping document review containing True Source Certified seal numbers.</li> <li>d. Mass Balance: Purchases/Inventory/Domestic market/True Source Certified Shipments.</li> <li>e. Invoices for purchase and sale, bills of lading, drum purchasing records.</li> <li>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.</li> <li>g. When utilizing offsite collectors/collection center locations for homogenizing honey collections: <ul style="list-style-type: none"> <li>1. Locations must be accessible to auditor upon request.</li> <li>2. Full document traceability of transfers and homogenization records must be maintained and provided to auditor.</li> <li>3. Locations must have shared ownership of the Processor/Exporter seeking certification. Or</li> <li>4. Locations must be current Processors/Exporters fully certified to the True Source Certified Standards.</li> </ul> </li> </ul>
<b>5.5</b>	<b>Audit and certification procedures</b>
<b>5.5.1</b>	<b>Audits may only be conducted by a 3<sup>rd</sup>-Party audit firm approved by the True Source Honey Board.</b>
	<p>The 3rd-Party audit firm is directly responsible for:</p> <ul style="list-style-type: none"> <li>a. Audit administration, scheduling, contracting, and reporting audit results to client.</li> <li>b. Issuing of certificates.</li> <li>c. Handling complaints and appeals (see Section 6.2 Complaints and Appeals).</li> <li>d. 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.</li> </ul>
<b>5.5.2</b>	<b>Auditor Requirements</b>
	<p>To become a program auditor, individuals must be:</p> <ul style="list-style-type: none"> <li>a. Experienced auditor</li> <li>b. Experience in food schemes</li> <li>c. Experience auditing schemes that have a traceability component</li> <li>d. Experience with on-site sampling</li> <li>e. Experience/training in the field of production and traceability for food processing eligible in the area of general foodstuffs (at least 2 years).</li> <li>f. Evidence of at least 10 audits/inspections.</li> </ul>
<b>5.5.3</b>	<b>New auditors</b>
5.5.3.1	Undergo training that incorporates a mock audit that included traceability training specific to True Source Honey.
5.5.3.2	Complete the required training and pass a written test to confirm knowledge of the standard and audit criteria.
	<p>On-going monitoring and evaluation of Auditor by the certification bodies must include:</p> <ul style="list-style-type: none"> <li>a. Participation in random evaluation process, to help determine auditor compliance and consistency of results, to potentially include: <ul style="list-style-type: none"> <li>b. Witness audits</li> <li>c. Review of auditor's scoring/audit results</li> <li>d. Additional witness audits as needed if concerns are identified during the review process</li> </ul> </li> </ul>

		e. 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.
<b>5.6</b>		<b>Report Reviews and Certification Decisions</b>
<b>5.6.1</b>		<b>Eligibility</b>
		To be eligible to review audit reports and make certification decisions, individuals must meet the auditor requirements set out in Section 5.5.2. Auditors must not review or make certification decisions on their own audits.
<b>5.6.2</b>		<b>Assignment of Auditors (Consecutive Audits at the same site)</b>
		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.
<b>5.7</b>		<b>Certificate Validity</b>
<b>5.7.1</b>		<b>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.</b>
<b>5.7.2</b>		<b>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:</b>
		<ul style="list-style-type: none"> <li>a. The extension is granted by the 3rd-Party audit firm prior to certificate expiry, and</li> <li>b. The audit will occur during the extension period, and</li> </ul> Justification for the extension is recorded as per the 3RD-PARTY AUDIT FIRMS internal procedures.
<b>5.7.3</b>		<b>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”);</b>
		<ul style="list-style-type: none"> <li>a. The following schedule is to be followed for the initiation of the renewal audit. <ul style="list-style-type: none"> <li>1. 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.</li> <li>2. 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.</li> </ul> </li> <li>b. 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.</li> </ul>
<b>5.8</b>		<b>Certification Decisions</b>
<b>5.8.1</b>		<b>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).</b>
		<ul style="list-style-type: none"> <li>a. 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.</li> <li>b. All requirements of the standard have been fully covered, using any supporting notes made during the audit by a suitably qualified auditor.</li> <li>c. 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.</li> <li>d. All areas of non- conformity have been identified and effective corrective action has been taken to resolve these non-conformities.</li> </ul>

<b>5.9</b>	<b>Suspensions and Decertification</b>
<b>5.9.1</b>	<b>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.</b>
<b>5.9.2</b>	<b>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:</b>
	<ul style="list-style-type: none"> <li>a. 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.</li> <li>b. 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.</li> <li>c. 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.</li> <li>d. 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.</li> </ul> <p>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.</p>
<b>6</b>	<b>Miscellaneous</b>
<b>6.1</b>	<b>Confidentiality and Non-Disclosure</b>
6.1.1	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.
6.1.2	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.
<b>6.2</b>	<b>Complaints and Appeals</b>
	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.
<b>6.3</b>	<b>Collective Trademarks and Logos</b>
6.3.1	Ownership and duration of use - True Source Certified® and True Source Honey Collective Trademarks and Logos
6.3.1.1	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;
6.3.1.2	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;
6.3.1.3	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;
6.3.1.4	Discontinue any use of the True Source Certified® and/or True Source Honey® Collective Trademarks and Logos to which TSH reasonably objects;
6.3.1.5	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;

6.3.1.6	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
6.3.1.7	Payment within the specified time of any fees set by TSH or as otherwise agreed to by the parties.
<b>6.3.2</b>	<b>Terms of Use - True Source Certified® Logo and True Source Honey® Logos</b>
	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.
6.3.2.1	The True Source Certified® logo is for use by True Source Certified® members only who have successfully completed a True Source Certified® audit.
6.3.2.2	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.
6.3.2.2.1	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.
6.3.2.2.2	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.
6.3.2.2.3	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.
6.3.2.2.4	The True Source Certified® and True Source Honey® logos must be used correctly to protect the integrity of the logos and the program.
6.3.2.2.5	Translation or localization of the True Source Certified® and True Source Honey® logos is not allowed. The logos may be used in English only.
6.3.2.2.6	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.
	<b>The following guidelines must be strictly observed when using the True Source Certified® and/or True Source Honey® logos.</b>
6.3.2.3	True Source Certified® Logo Applications:
6.3.2.3.1	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.
6.3.2.3.2	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.
6.3.2.3.3	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.
6.3.2.3.4	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.



6.3.2.3.5	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.
6.3.2.4	True Source Honey® Logo Applications:
6.3.2.4.1	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.
6.3.2.4.2	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.
6.3.2.4.3	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.
<b>6.3.3</b>	<b>Suspension, Withdrawal and Transfer of Trademark Use</b>
6.3.3.1	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):
	<ul style="list-style-type: none"> <li>a. Suspension if the Member Company breaches or fails to comply with these rules;</li> <li>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</li> </ul>
6.3.3.2	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.
6.3.3.3	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.
6.3.3.4	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.
6.3.3.5	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.



6.3.3.6	Transfer of Authorization for Certification and Use of the Mark Upon request and with documentation of continued Conformance with all applicable NSF Ag requirements, and after the new Company’s execution of the Contract along with payment of any outstanding fees, NSF Consumer Values Verified may transfer authorization for continued Certification of a specific Site to another Organization as a result of name change, change of ownership, or change of a production and/or service location. An Additional Audit at the applicant’s expense may be required. A Site visit may be necessary if there is a change in location, business or quality management”.
<b>6.3.4</b>	<b>Right of Appeal – Participating Member Company</b>
6.3.4.1	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.
6.3.4.2	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.
6.3.4.3	After receiving the notice of appeal, TSH must either:
6.3.4.4	<ul style="list-style-type: none"> <li>a. Give notice to the Member Company that it has reversed in decision to suspend or withdraw the Member Company’s Membership; or</li> <li>b. Refer the appeal to independent adjudication or arbitration in accordance with its appeal procedures.</li> </ul>
<b>6.3.5</b>	<b>Notices and Register – Participating Member Company</b>
6.3.5.1	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.
6.3.5.2	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.
<b>6.3.6</b>	<b>Right of Appeal – Certified Company</b>
6.3.6.1	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.
6.3.6.2	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.
6.3.6.3	After receiving the notice of appeal, TSH or the Licensed Certification Entity must either:
	<ul style="list-style-type: none"> <li>a. Give notice to the Certified Company that it has reversed in decision to suspend or withdraw the Certified Company’s certification; or</li> <li>b. Refer the appeal to independent adjudication or arbitration in accordance with its appeal procedures.</li> </ul>
<b>6.3.7</b>	<b>Notices and Register – Certified Company</b>
6.3.7.1	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.
6.3.7.2	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.

<b>6.3.8</b>	<b>Amendment of Rules of Use</b>																																
6.3.8.1	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.																																
<b>7</b>	<b>Authenticity Guidance for 3<sup>rd</sup> Party Auditors and True Source Honey Members</b>																																
<b>7.1</b>	<b>Testing Variability and root cause analysis</b>																																
	<p>a. 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 to arrive at a conclusion. Different targeted tests, other than those mentioned in this document, may be used when conducting a root cause analysis.</p> <p>b. True Source Honey may contract with an independent expert to review and advise both the Certification Body and True Source when test results are inconclusive and require additional investigation. The independent expert will issue a final determination on the case concerning whether a particular sample should be considered pass or fail.</p>																																
7.1.1	A Packer must conduct a root cause analysis that could include investigation of the beekeeping practices and additional testing as recommended by the selected qualified lab. 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 qualified 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.																																
7.1.2	The following table provides guidance based on the battery of tests selected for a lot of raw honey.																																
<b>Table 8</b>	<b>Authenticity Guidance for C3 Failures</b>																																
	<table border="1"> <thead> <tr> <th colspan="4">Test Type and Result</th> </tr> <tr> <th>EA/LC-IRMS – C4</th> <th>EA/LC-IRMS – C3</th> <th>HRMS</th> <th>Conclusion</th> </tr> </thead> <tbody> <tr> <td>Pass</td> <td>Pass</td> <td>Pass</td> <td>Pass</td> </tr> <tr> <td>Pass</td> <td>Fail</td> <td>Pass</td> <td>Pass</td> </tr> <tr> <td>Pass</td> <td>Pass</td> <td>Fail</td> <td>Fail</td> </tr> <tr> <td>Pass</td> <td>Fail</td> <td>Fail</td> <td>Fail</td> </tr> <tr> <td>Fail</td> <td>Pass</td> <td>Pass</td> <td>Fail</td> </tr> <tr> <td>Fail</td> <td>Fail</td> <td>Fail</td> <td>Fail</td> </tr> </tbody> </table>	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
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																														
<b>7.1.3</b>	<b>Auditor Sampling Protocol at Exporter/Packer</b>																																
7.1.3.1	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.																																
7.1.3.2	The audit firm is required to use the same testing qualified laboratory and methodology as the Exporter/Packer.																																
<b>8</b>	<b>Additional Information</b>																																
<b>8.1</b>	<b>Approved Pollen Analysis, NMR or HRMS for Country of Origin verification Laboratories Please note this is only for Pollen Analysis and NMR geographical origin. EA/LC-IRMS and HRMS require an ISO certified lab for testing.</b>																																
8.1.1	Intertek Food Services GmbH																																
	<p>Olof-Palme-Str. 8, 28719 Bremen Germany  Phone: +49 (0) 421 65 727 1 Fax: +49 (0) 421 65 727 222  Email: applica@intertek.com, Website: www.intertek.de  Pollen analysis 1 - Determination of geographical origin: Qualitative pollen spectrum analysis, solid components (honeydew elements and other), electrical conductivity, sensory analysis, yeasts (estimated) and starches. Lab Code: 101291  Code: 175600 – NMR includes geographical/botanical Origin</p>																																

8.1.2	Quality Services International GmbH:
	Flughafendamm 9a, 28199 Bremen Germany Phone: +49 - (0)421 - 59 47 70, Fax: +49 - (0)421 - 59 47 71 Email: info@qsi-q3.de , Website: www.qsi-q3.de
8.1.3	Eurofins Food Integrity Control Services GmbH:
	Berliner Straße 2, 27721 Ritterhude Germany Phone: +49 (0)4292 4077200, Fax: +49 (0)4292 4077299 Email: efics@eurofins.de
8.1.4	FOODQS GmbH:
	Mühlsteig 15, 90579 Langenzenn Germany Phone: +49 - (0) 9101 – 701830, Fax: +49 - (0) 9101 – 7018320 Email: info@foodqs.de, Web: www.foodqs.de

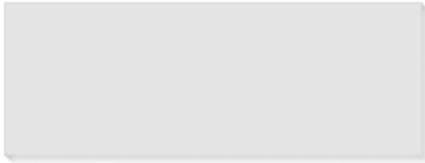
**8.2 Examples of Required Documentation**

**8.2.1 Lab Report**

**Quality Services International GmbH  
Test Report No. 210-505717**



QSI GmbH - Flughafenamm 9a - D-28199 Bremen



Date: 19-Feb-2020

**Customer No.:** [Redacted]      **Sample No.:** [Redacted]  
**Product:** Honig/Honey  
**Label:** [Redacted]  
**Arrival Date:** [Redacted]      **Start / End of Analysis:** [Redacted]  
**Kind:** [Redacted]      **Packaging:** [Redacted]  
**Seal:** [Redacted]      **Temp.:** [Redacted]

**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 <sup>^</sup> )	mS/cm	[Redacted]
rel.frequency of pollen(ASU L 40.00-11, 2003-12, mod. <sup>^</sup> )		
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. [Redacted]

Page: 1 of 2

Quality Services International GmbH  
 Flughafenamm 9a  
 D-28199 Bremen

Tel. +49 421 506607-0  
 e-mail: info@qsi-q3.de  
 GTC see homepage  
 www.qsi-q3.de

Amtgericht Bremen  
 HRB 16842  
 Managing Director:  
 Gudrun Beckh

Berenberg Bank  
 IBAN: DE32 2012 0000 0065 9320 06  
 BIC: BEGO DE 33  
 VATIN: DE 202142221





[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]

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:

[Redacted 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.

Test Report No.: 210-505717 Version 0

Page: 2 of 2

Quality Services  
International GmbH  
Flughafendamm 5a

Tel: +49 421 596607-0  
e-mail: info@qsi-q3.de  
GTC see homepage

Amtgericht Bremen  
HRB 16842  
Managing Director:

Berenberg Bank  
IBAN: DE32 2012 0000 0065 9320 06  
BIC: BEGO DE 33





### SAMPLING AND CONTAINER LOAD SUPERVISION REPORT

#### GENERAL DETAILS

Name of Processor Organization	
Processor Organization Address	
Destination Country:	USA
Facility Representative:	
Tel:	
Fax:	
E-mail:	
Importer Name	
Sampling Date	
Sampling Inspector	
Sampling Location	

Sampled product seal identification details	Sample Seal Identification Code	
	Customer	NSF
	Lot & Drum sampled	

#### LOADING PROCESS DETAILS

Loading date			
Load Supervision Inspector			
Loading location			
Is True Source Seal fixed/applied at the loading location?			
Remarks regarding Honey consignment Packing and Drum marking			
No of drums	Net weight of drum	Container No	True Source Seal
65	291		
Other seal details (Like customs/line seals)			



**PHOTO**



**Security Seal of Drum**



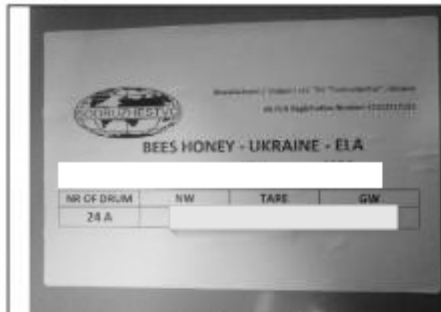
**Security Seal of Drum**



**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\*\*\*\*\*





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

Tel: +49 4292 40772 00  
 Fax: +49 4292 40772 99

efics@eurofins.de

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		%

The results of examination refer exclusively to the checked samples.  
 Any publication of this report requires written permission. An excerpt publication is not allowed.  
 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 266619.  
 Managing Director: Dr. Hart-Peter Raabe  
 XT No.: DE301552988  
 Hypovereinstbank: SWIFT-BIC: HYVEDE33HAN17 IBAN: DE77 2073 0817 7009 0022 00

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<http://www.eurofins.de/leistungen/kontakt/irms.aspx>, shall apply.



F/G-ratio 1.05 (± 0.10)

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

### **Assessment**

[Redacted]

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

[Redacted Signature]

Laborleiter

The results of examination refer exclusively to the checked samples.  
Any publication of this report requires written permission. An exact publication is not allowed.  
Eurofins Food Integrity Control Services GmbH - Berliner Straße 2 - D-21721 Rittshude  
The place of execution and jurisdiction is Walarode - lower district court Walsrode HRB 268619  
Managing Director: Dr. Rüdiger Peter Raetzke  
VAT No.: DE301552988  
Hypovereidbank SWIFT-BIC: HYVEDE33 IBAN: DE17 2073 0917 0008 0022 00

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Eurofins Food Integrity Control Services GmbH  
 Berliner Straße 2  
 D-27721 Rellingen  
 Niedersachsen  
 GERMANY

Tel: +49 4292 40772 00

info@eurofins.de  
 www.eurofins.de

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

Report date 07.02.2023

Page 1/2

### Analytical report

AR-23-TH-000888-01-AA0SG



### Sample Code

Z98-2023-00000971

Sample name 37704 Ukraine, Sunflower  
 Packaging Plastic cup  
 Supplier Cifard  
 Origin UKRAINE  
 Type Sunflower  
 Number sample labels 1  
 Type of seal Without seal  
 Amount approx.100 g  
 Reception temperature room temperature  
 Reception date time 30.01.2023  
 Start / End of analysis 30.01.2023 / 03.02.2023

### Test results

#### Authenticity

AP020 1H-13C NMR profiling of honey (sugars, HMF, organic acids)

Method Internal

Referenced to a Eurofins laboratory accredited for this test

Result	Uncertainty	Unit
Fructose	41.8	(± 3.3) g/100 g
Glucose	38.4	(± 2.8) g/100 g
Fructose / Glucose	1.08	(± 0.10)
Glucose+Fructose	80.0	(± 6.0) g/100 g
Sucrose	<0.3	g/100 g
Tulose	0.71	(± 0.12) g/100 g
5-HMF	<5	mg/kg
Mannose	<300	mg/kg
Glycerolacetone	<20	mg/kg
Citric acid	198	(± 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	263	(± 40) mg/kg
Botanical origin - Sunflower	0.98	
Geographical origin - Ukraine	1	
Statistical significance		typical / not substantiated

#### Assessment

The 1H/13C NMR profiling test did not reveal any sugar addition.

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



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

Tel: +49 4292 40772 00  
Fax: +49 4292 40772 99

efics@eurofins.de

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

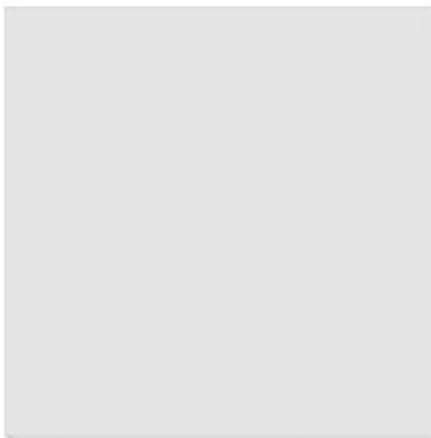
Report date 26.02.2020

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



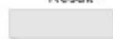
**Test results**

**Authenticity**

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

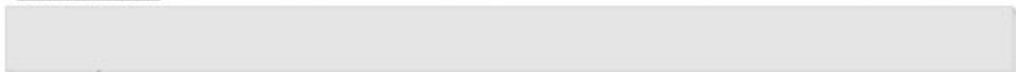
Sugar syrup addition

Result      Uncertainty      Unit



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

**Assessment**



Signature



Laborleiter

