



True Source Certified™ Standards

Revision 8-5-2011

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

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Overview of True Source Certified™

True Source Certified™ is a voluntary system of origin traceability for those participants, in an international supply chain, who wish to demonstrate through an independent 3rd Party Audit Firm that their sourcing practices for honey are in full compliance with US and international trade laws.

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

Therefore, True Source Honey, LLC has developed the True Source Certified voluntary system of traceability for those participants who wish to demonstrate through an independent 3rd party that their sourcing practices are in full compliance with US and International trade laws. This system permits honey to be tracked from the consumer back through the supply chain to the country of origin and the Beekeeper that harvested the honey from the beehive. The basic responsibilities of each participant are as follows:

- | | |
|-----------------------------------|---|
| True Source Certified: | Establish and maintain the standards for certification. |
| 3 rd Party Audit Firm: | Conduct audits to evaluate compliance to the standards.
Assign the True Source Certified Identification Number to each Load. |
| Beekeepers: | Produce and sell pure honey directly from their own operation. |
| Processor/Exporters: | Purchase honey only from within their country of operation for resale/export.
Maintain a system of traceability and use a True Source Certified Identification Number for every load of honey. |
| Importers: | Follow True Source Certified standards when purchasing certified loads of honey.
Provide the required documentation to Packers related to the import of each load. |
| Packers: | Maintain a system of traceability and purchase only True Source Certified honey from certified participants in the supply chain. |

It is through the application of these standards and the involvement of an independent 3rd party that trading partners can have the assurance of complete traceability and compliance with US and International laws.

Section 1 - Background

1.1 History of Traceability in the Honey Industry

It is a matter of public record, that two executives of a Chicago-based import company were arrested on federal charges for allegedly conspiring to import antibiotic-tainted honey from China. (US Immigration and Customs Enforcement News Release May 27, 2008) The ensuing investigation culminated in a guilty plea by a Seattle-area business man and a 44 count indictment charging 11 individuals and 6 corporations for allegedly participating in an international conspiracy to illegally import Chinese honey (US Immigration and Customs Enforcement News Release September 2, 2010).

According to a September 1, 2010, U.S. Department of Justice news release,: “The indictment alleges that the defendants conspired to illegally import Chinese-origin honey, including honey tainted with antibiotics, into the United States by mislabeling it as originating in other countries to avoid paying the antidumping duties and to conceal and expand the illegal smuggling scheme by submitting false documents to obstruct the U.S. Department of Commerce.”

When asked if the case was now closed related to circumvented honey:

Leigh Winchell – special agent with Homeland Security Investigations tactfully declined to comment on whether he thought this week’s indictments was a wrap-up of the honey laundering or transshipment scams. However, he said he has a newly created, 15 person, full-time team of federal, state and local investigators closely watching what comes through our ports. (as reported by Andrew Schneider, Sept. 2, 2010 AOL.com).

The results of these investigations allege that Chinese honey was imported by the defendants and mislabeled as if it was coming from other countries in order to avoid millions of dollars in anti-dumping duties (US Immigration and Customs Enforcement News Release September 2, 2010). The former president of a Chinese honey manufacturer was sentenced Tuesday to 18 months in federal prison for conspiring to smuggle Chinese-origin honey into the U.S. - some of which was tainted with antibiotics - to avoid nearly \$4 million in anti-dumping duties. This sentence resulted from an investigation conducted by the U.S. Immigration and Customs Enforcement (ICE) Office of Homeland Security Investigations (HSI). According to court documents, some of the Chinese honey Yan shipped to the U.S. was adulterated with antibiotics, specifically Norfloxacin and Ciprofloxacin, which are banned from domestic foods (US Immigration and Customs Enforcement News Release September 2, 2010).

Food Safety is entirely dependent upon traceability and clear identification of the origins of food products entered into the United States. As an example, the excerpt below from the September 2010 Indictment clearly demonstrates that honey contaminated with chloramphenicol was declared as originating in a country other than China.

Line - 38) On or about August 3, 2005, MARTEN emailed LIU, WEICKERT, and BELTEN,

with a copy to GERKMANN and GEHRICKE, that contained the subject line “visit preparation,” attached a spreadsheet entitled “PO history BA.xls,” and discussed Blue Action’s honey purchase order history, alternative countries of origin for falsely declaring Chinese-origin honey, and that some honey was adulterated with chloramphenicol.

FDA Import Alert #36-03, published in January of 2010: stating that up to 80% of samples from China and analyzed in Canada have been positive for chloramphenicol.

Import Alert # 36-03

Published Date: 01/14/2010

Type: DWPE

Import Alert Name:

"Detention Without Physical Examination of Honey Due to chloramphenicol"

Reason for Alert:

Analysis of 2 samples of honey (#167615 & 169229) by DEN-DO found chloramphenicol (CAP). Canada, the United Kingdom, the European Union, and Japan have found CAP in honey from China. Preliminary test results from Canada indicate about 80% of the samples they have analyzed are positive for CAP.

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

United States Import Statistics – Volume in Tons

(derived from <http://www.ers.usda.gov/Briefing/Sugar/data/table48.xls>)

Partner Country	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010
World	89,890	65,700	92,062	92,220	80,917	105,677	125,940	105,676	104,986	95,495	113,931
China	26,633	17,713	7,737	24,063	26,916	29,366	32,149	17,755	11,252	67	1,547
Vietnam	1,902	5,751	14,356	7,979	9,792	13,582	13,263	15,707	19,378	17,430	20,738
India	-	20	2,465	4,722	6,872	7,632	11,090	7,671	13,648	13,137	18,462
Malaysia	-	-	1,039	3,534	442	220	141	1,891	4,150	9,068	15,396
Russia	11	36	26	135	1,074	1,328	4,765	4,156	3,165	81	-
Taiwan	27	27	44	81	759	2,408	311	753	3,983	5,595	1,755
Thailand	161	1,302	4,445	799	769	518	1,795	790	956	1,847	1,699
Indonesia	-	-	-	384	1,876	1,617	1,195	447	1,814	5,124	7,712
Mongolia	-	-	-	-	-	581	1,092	1,060	363	836	-

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

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

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

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

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

True Source Certified™ (Certified) is a system that combines 3rd party audits with active 3rd party sampling and container shipment oversight. While Certified applies to all participants in the supply chain, from Beekeepers, to Processor/Exporters, Importers and Packers – there are two critical areas of focus, the Exporter and the Packer. In order to provide complete assurance of traceability, participants must adhere to all of the elements of the standard. These include proper documentation, use of the True Source Certified system of identification and in some countries, the use of 3rd party auditors to sample and seal loads in the country of origin prior to shipment.

1.2 Recent Enactment of Landmark Food Safety Legislation

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

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

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

Since these new food safety-related traceability requirements are now statutory law, the True Source Certified system has been designed to accommodate these new mandates, so Producers, Packers, Importers and others in the honey chain can be assured that the certification system is consistent with the latest food safety reforms.

Section 2 – True Source Certified Framework

2.1 Governing Body

True Source Honey, LLC and thus True Source Certified are governed by a seven member Board of Directors with representatives from the United States and Canada, which includes Beekeepers, 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 participants (Beekeepers, Processor/Exporters, Importers and Packers) and appointed by a majority vote of the current board. The governing body is intended to function as a multidisciplinary body that includes perspectives from as many points in the supply chain as practical.

2.2 Terms and Definitions

Definitions -- the following definitions apply to terms referenced in this document:

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

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

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

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

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

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

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

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

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

Certification Audit: The initial evaluation of the systems and procedures in place to demonstrate compliance to the True Source Certified standards. Certification audit applies only to Processor/Exporters from and approved country and North American Packers.

Certification Trademarks: means the letters and words “True Source Honey” and “True Source Certified” and the logo depicted in Attachment A.

Certification: Confirmation by the 3rd party Audit Firm of the compliance to the True Source Certified™ standards by Packers and Processor/Exporters.

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

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

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

Collective Trademarks: Letters and words “True Source Honey” and the logos depicted in Attachment A.

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

Honey: Honey is the natural sweet substance produced by honey bees from the nectar of plants or from secretions of living parts of plants or excretions of plant sucking insects on the living parts of plants, which the bees collect, transform by combining with specific substances of their own, deposit, dehydrate, store and leave in the honey comb to ripen and mature. Honey may not contain, or be combined with foreign sugars and maintain the designation Honey as defined in this document.

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

Member Company: Certified Companies and Participating Companies.

Non-Advertising Use: means any images, documents, labels or other items not used to directly promote the sale of a product.

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

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

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

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

Surveillance Audit: Once a company achieves certification, they will be subject to bi-annual unannounced surveillance audits. A Surveillance Audit is similar to the Certification Audit in content but is unannounced.

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

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

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

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

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

2.3 Approved Countries for Export Certification

Approval Criteria – Current Exporting Countries

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

1. Country has an established and verifiable honey crop history.
2. Country has an established and verifiable crop history of available honey for export.
3. Country has an established and verifiable honey export history.
4. Country has an established and consistent honey export history, pre and post anti-dumping duties imposed by the United States in December of 2001.

Risk Level – Current Exporting Countries

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

1. Consistency of honey crop exportation.
2. Approved import standards into major trade countries.
3. Documented history of illegal circumvention of US and International Trade Laws.
4. Alleged history of illegal circumvention of US and International Trade Laws.

The following countries meet the approval criteria and risk rating established above.

Low Risk Country	Medium Risk Country *	High Risk Country **
Argentina (August 2011)	Australia	India (May 2011)
Brazil	China	Vietnam (August 2011)
Canada (July 2011)	Ukraine	
Chile		
Guatemala		
Mexico		
New Zealand		
United States (July 2011)		
Uruguay		

* Medium Risk Country: 3rd party audit firm supervises container loading + sampling/lab testing (pollen analysis)

** High Risk Country: 3rd party audit firm supervises container loading + sampling/lab testing (pollen analysis) plus additional requirements in India (Financial Audit) and Vietnam (Certificate of Origin Form B).

Audits will begin for India, Vietnam, Argentina, USA and Canada in 2011 as noted. Audits will be available in the remaining countries throughout the course of 2012.

Approval Criteria – New Exporting Countries

Countries not shown on the table do not meet the current approval criteria and are subject to the following:

1. Any Processor/Exporter in a country that does not currently meet the aforementioned approval criteria is eligible to undergo a certification audit. If successful, the audit firm will issue a maximum of 10 True Source Certified Identification Numbers to permit the shipment of 10 FCL's.
2. Any country that does not currently meet the aforementioned approval criteria can gain qualification as an approved country based on a weighted score of proven qualifications, as determined by the TSH board of directors.

Section 3 - Certification

3.1 Certification for Packers

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

3.1.1 Register for Certification (Packers)

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

3.1.2 True Source Certified Standards (Packer)

- 3.1.2.1 Phased Adoption of Standard: In order to avoid restriction in sources of supply and minimize the effect of certification on market pricing, True Source Certified will phase-in over 5 years for Packers. This will allow all interested participants to integrate True Source Certified sourcing practices into their supply chain. During 2011 a Packer may elect to participate in a Certification Audit and can pass that audit without Certified Processor/Exporters, and without registered beekeepers provided that the Processor/Exporter and other participants can provide all required documentation for each load or shipment. By 2015, 90% of any Certified Packers sourcing must come from Fully Compliant participants (Certified Processor/Exporters, Registered Importers and Registered Beekeepers). Packers that do not meet the minimum percentages in any year of phase-in are not eligible for certification. 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.

Year	Fully Compliant Load Percent (%)	Minimally Compliant Load Percent (%)	Non-Compliant Load Percent (%)
2011	0	60	40
2012	30	40	30

2013	60	20	20
2014	80	10	10
2015	90	5	5

Fully Compliant Load: A load of honey may be described as Fully Compliant if it meets the following conditions: The Processor/Exporter must have successfully completed a Certification Audit and all subsequent Surveillance Audits. The Importer must be a registered participant with True Source Certified. The Packer must have successfully completed a Certification Audit and all subsequent Surveillance Audits and all required documentation must accompany each load or shipment, including the use of the True Source Certified Identification Number and evidence of 3rd party pre-shipment inspections where applicable. Beekeepers selling directly to North American Packers must be registered with True Source.

Minimally Compliant Load: A load of honey may be described as Minimally Compliant if it meets the following conditions: The Packer must have successfully completed a Certification Audit and all subsequent Surveillance Audits and all required documentation must accompany each load or shipment (see below). Loads or shipments from High and Medium risk countries are not eligible for Minimal compliance; they must achieve full compliance to participate.

Non-Compliant Load: A load of honey that has not been certified as either Minimally or Fully compliant load is considered non-compliant. Loads or shipments that cannot be associated with all or some required documentation are considered Non-Compliant. Failure to maintain any single element of certification renders a load of honey non-compliant and a sufficient percentage of non-compliant loads will cause a participant to lose their certification.

- 3.1.2.2 Purchase Honey from Approved Countries (see section 2.3, Approved Countries).
- 3.1.2.3 Maintain a system of traceability:
 - a. Clearly identify all shipments of honey that arrive to or are shipped from the plant.
 - b. Maintain the identity of individual lots of raw honey from specific suppliers as honey is processed to create product for the retail, wholesale or bulk ingredient market.
- 3.1.2.4 Maintain required documentation for every purchased shipment of raw honey: (Section 6.2 or www.tshmember.com)
 - a. **CBP Form 3461** showing: 0409.00 in box 24, Country of Origin in box 25 (must be the same as the one declared on the invoice to the Packer), Container no in box 29 (must match the number declared on the bill of lading and the invoice to the Packer)
 - b. **Ocean/Bill of lading** copy showing: Place of receipt must be from the same country as the Processor/Exporter and the country of origin declared on the CBP form 3461, Shipper

must be the Processor/Exporter, Consignee or Notify party must be the same as the seller to the Packer, True Source Honey ID# (see section 3.1.2.1), Exporter's lot number.

c. **Analysis Report: *Pollen-geographical origin of honey (See Section 6 for Approved Laboratories)***

For High and Medium risk origins, the audit firm must sample each load and confirm country of origin through a pollen analysis with an approved laboratory. A copy of the laboratory report, stating the country of origin, must be supplied to the Packer for each certified load. The True Source Certified ID number assigned to that load must be the sample identification number stated on the laboratory report.

d. **Country-Specific Export Documents:**

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

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

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

3.1.2.5 Successfully complete audit by 3rd Party Audit Firm

3.1.3 Certification Audit (Packers)

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

- 3.1.3.1.1 Evaluate the system of traceability as it applies to maintenance of required records and purchase transactions. Each load purchased must have an associated True Source Certified ID # and that number must be valid.
- 3.1.3.1.2 Reconcile loads purchased against annual sales volume. The number of loads purchased from both import and domestic suppliers should approximate the annual average production of the facility.
- 3.1.3.1.3 Collect random samples of honey inventory to compare against stated origin (pollen) Minimum of 5 samples. Note: any honey subject to random sampling and analysis must contain sufficient pollen to permit determination of country of origin – absence of pollen is treated as a failure of the analysis. If processed/filtered honey is imported for resale, the Processor/Exporter of that product must be certified to True Source Certified Standards for Import to Direct US Distribution.

- 3.1.3.1.4 Select one or more suppliers at random to participate in a field audit to confirm stated volumes of purchase (domestic suppliers).
- 3.1.3.1.5 Surveillance Audit: Once a Packer achieves certification, they will be subject to bi-annual unannounced surveillance audits. A Surveillance Audit is identical to the Certification Audit in content but is unannounced.
- 3.1.3.1.6 If either audit is unsuccessful, a period of six months must pass before a second audit can occur. If the audit is unsuccessful a second time, a period of 1 year must pass before an additional audit can occur.
- 3.1.3.1.7 Upon successful completion of the audit, the audit firm will notify True Source. True Source will issue an invoice for the True Source annual fee and upon receipt of payment will instruct the audit firm to release the Certificate of Certification.

Pounds Processed/Handled	Annual Fee (USD)
0-5 Million Pounds	\$500
6-15 Million Pounds	\$1000
16-30 Million Pounds	\$1500
31-60 Million Pounds	\$2000
61+ Million Pounds	\$2500

3.2 Certification for Processor/Exporters

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

3.2.1 Register for Certification (Processor/Exporters)

3.2.1.1 Submit a Registration Form to the audit firm.

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

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

3.2.1.3 Schedule an Audit: Once a registration form has been submitted and approved by the audit firm, and any applicable pre-certification requirements have been met, the Processor/Exporter is eligible to schedule an audit. The cost of the audit will be determined by the audit firm and vary depending upon the individual rates in the country or region in which it is conducted and will include an audit fee and auditor expenses.

3.2.2 True Source Certified Standards (Processor/Exporters)

3.2.2.1 Purchase, process or handle honey only from within the country of operation – requires that the Processor/Exporter is operating in an approved country (see section 2.3, Approved Countries). The importation of honey for processing, handling or export is prohibited under True Source Certified Standards.

3.2.2.2 Establish and maintain a system of traceability.

3.2.2.2.1 Include records of all purchases from Beekeepers and collectors.

3.2.2.2.2 Include a system of traceability than can account for the blending of various lots from different suppliers to create a shipping batch.

3.2.2.2.3 Clearly identify all shipments of honey that arrive to or are shipped from the processing plant or other warehouse facilities using the established system of traceability.

3.2.2.2.4 Clearly label all individual drums within each certified load as follows:

- a. Product: Honey
- b. Country of Origin
- c. Exported by : Processor/Exporter Name and address
- d. Imported by: Importer Name and Address

- e. True Source Certified ID number
 - f. Lot number (as per Processor/Exporter traceability system)
 - g. Drum number
 - h. Gross, Tare, Net weight (if not included in shipping documents)
- 3.2.2.2.5 For Medium and High risk Countries – each certified load must be sealed using a True Source Certified Seal and sampled by the audit firm prior to shipment.

- 3.2.2.2.6 Export documentation:
Ocean/Truck Bill of Lading must contain the following information:
- a. Shipper must be the Processor/Exporter.
 - b. Place of receipt must be from the same country as the Processor/Exporter.
 - c. Description must contain the following information:
 - 1. Honey
 - 2. Quantity
 - 3. True Source ID#
 - 4. Processor/Exporter lot number.
 - d. Buyer must be the consignee or the notify party.
 - e. In the case of Ocean Bill of Lading: Ocean Container Number

Country-Specific Export Documents:

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

Vietnam – all shipments must include Certificate of Origin form B.

Analysis Report: *Pollen-geographical origin of honey*

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

3.2.3 Certification Audit (Processors/Exporters)

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

3.2.3.1.1 Document Audit

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

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

determination of country of origin – absence of pollen is treated as a failure of the analysis.

- 3.2.3.1.3 Suppliers (Beekeepers and collectors) will be selected at random to participate in a field audit to confirm stated volumes of trade.
- 3.2.3.1.4 Surveillance Audit: Once a Processor/Exporter achieves certification, they will be subject to bi-annual unannounced surveillance audits. A Surveillance Audit is identical to the Certification Audit in content but is unannounced.
- 3.2.3.1.5 If either audit is unsuccessful, a period of six months must pass before a second audit can occur. If the audit is unsuccessful a second time, a period of 1 year must pass before any future audits can occur.
- 3.2.3.1.6 Upon successful completion of the audit, the audit firm will notify True Source. True Source will issue an invoice for the True Source annual fee and upon receipt of payment will instruct the audit firm to release the certification. The annual fee is allocated for the maintenance of the standards, website and associated marketing materials.

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

Section 4 - Participation

4.1 Participation for Beekeepers

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

4.1.1 Register to Participate

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

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

4.1.1.1.2 Complete a registration form (www.tshmember.com) and submit the form and registration fee to True Source Honey. The registration fee is payable once every three years.

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

4.1.2 Follow True Source Certified Standards

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

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

	Requirements for North American Beekeepers (Canada, Mexico and the United States)
Fully Compliant Load:	Beekeeper registered with True Source
	Beekeeper must follow all applicable laws pertaining to the production, sale and/or export of honey. This may apply to both country of production and country of destination for direct exports. For example, Canadian beekeepers must meet all CFIA requirements and US Beekeepers must meet all FDA requirements – including facility registration.
	Each load must be accompanied by a Bill of Lading (BOL) with Beekeeper and Purchasers name & address, drum count and weight. If the purchaser is a participating importer, the participating importer name & address must also appear on the BOL with the Beekeeper and Purchaser.
Minimally Compliant Load:	Beekeeper must follow all applicable laws pertaining to the production, sale and/or export of honey. This may apply to both country of production and country of destination for direct exports. For example, Canadian beekeepers must meet all CFIA requirements and US Beekeepers must meet all FDA requirements – including facility registration.
	Each load must be accompanied by a Bill of Lading (BOL) with Beekeeper and Purchasers name & address, drum count and weight. If the purchaser is a participating importer, the participating

	importer name & address must also appear on the BOL with the Beekeeper and Purchaser.
Non-Compliant Load:	A load of honey that does not meet the requirements for Minimally or Fully compliant is considered non-compliant.

- 4.1.2.3 Produce and sell honey in accordance with the FDA Food Safety Modernization Act of 2010.
- 4.1.2.4 In the event that a Beekeeper is selected to participate as part of a Packer Audit:
 - a. They will be asked to confirm the volume of honey sold to the particular Packer participating in the audit. (Information shared is specific to only the participating Packer, not all Packers that the Beekeeper might conduct business with and is kept confidential between the audit firm, Packer and Beekeeper).
 - b. They will be asked to detail total production capacity: Hive numbers per location and totals, average annual production – capacity will be compared to volume transacted with participating Packer.
 - c. They will be asked to verify hive numbers and location by visiting several production yards or holding areas.
 - d. They will be asked to confirm that they have completed an FDA Food Facility Registration.
- 4.1.2.5 Canadian Beekeepers who sell directly to Packers within the United States are subject to participation in an audit of a Packer to whom they have sold honey as described above in 4.1.2.1.
- 4.1.2.6 Canadian Beekeepers who sell to Importers who then sell directly to Packers within the United States are subject to participation in an audit of a Packer to whom an Importer has sold honey as described above in 4.1.2.1.
- 4.1.2.7 Canadian Beekeepers must meet all CFIA regulations when selling to a Processor/Exporter or Packer in order to be considered fully compliant.

4.1.3 Participate in the Audit of a Packer or Processor/Exporter (Indirectly)

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

the Beekeeper has a number of hives to support the volume of honey sold to the Processor/Exporter.

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

4.2 Participation for Importers

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

4.2.1 Register to Participate (Importers)

4.2.1.1 Submit a Registration Form to the audit firm.

4.2.1.2 Once a registration form has been submitted and approved by the audit firm, True Source Honey will be notified and will issue an invoice for payment of the True Source Annual Fee. Upon receipt of payment, True Source Honey will issue a Certificate of Participation.

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

4.2.2 True Source Certified Standards (Importers)

4.2.2.1 Understand the Phase-In requirements for Packers and the requirements for Fully Compliant, Minimally Compliant and Non-Compliant loads. See section 3.1.2.1.

4.2.2.2 Purchase Honey from Approved Countries for Certified Transactions (see section 2.3, Approved Countries).

4.2.2.3 True Source Certified Identification Number: All documents must identify loads for shipment using the True Source Identification Number for High and Medium risk origins as well as Fully Compliant loads. (Minimally compliant loads do not require the use of the ID# - see section 3.1.2.1.).

- 4.2.2.4 Provide the following required documents for each load from a Processor/Exporter to Packer according to True Source Certified Standards. (Section 6.2 or www.truesourcertified.com)
- a. CBP Form 3461** showing: 0409.00 in box 24, Country of Origin in box 25 (must be the same as the one declared on the invoice to the Packer), Container no in box 29 (must match the number declared on the bill of lading and the invoice to the Packer)
 - b. Ocean/Bill of lading** copy showing: Place of receipt must be from the same country as the Processor/Exporter and the country of origin declared on the CBP form 3461, Shipper must be the Processor/Exporter, Consignee or Notify party must be the same as the seller to the Packer, True Source Honey ID# (see section 3.1.2.1), Exporter’s lot number.
 - c. Analysis Report: *Pollen-geographical origin of honey (See Section 6 for Approved Laboratories)***
For High and Medium risk origins, the audit firm must sample each load and confirm country of origin through a pollen analysis with an approved laboratory. A copy of the laboratory report, stating the country of origin, must be supplied to the Packer for each certified load. The True Source Certified ID number assigned to that load must be the sample identification number stated on the laboratory report.
 - d. Country-Specific Export Documents:**
India – all shipments must include the local sampling and weightment report issued by the audit firm and the Export Inspection Consul (EIC) certificate for inspection.
Vietnam – All shipments must include Certificate of Origin form B.
 - e. Truck Bill of Lading:** Must indicate container number, True Source Honey ID#, Exporter lot number.
 - f. Delivery order:** If the container is delivered directly to the Packer, Importer must supply the delivery order showing the following information: container number, both seal numbers: container seal and audit firm seal (as applicable), True Source Honey ID#, Exporter’s lot number.
 - g. Warehouse inbound receipt:** If the load is picked up by the Packer or delivery arranged by the seller to the Packer the following information must appear on the warehouse receipt: Container number, container and audit firm seal number (as applicable), True Source Honey ID#, Exporter’s lot number.
- 4.2.2.5 Importer Certificate of Participation: Upon registration of an Importer, TSH will issue an “Importer Certificate of Participation.”

Section 5 - Miscellaneous

5.1 Confidentiality and Non-Disclosure

- 5.1.1 No proprietary information of individual True Source Certified participants shall be shared with any True Source Honey, LLC or any of its members. Information concerning the number of containers/truckloads is provided to the independent third-party audit firm for certification and annual fee determination purposes.
- 5.1.2 The administrative third-party audit firm and each True Source Certified participant shall sign a Confidentiality and Non-Disclosure Agreement to protect the confidential and proprietary nature of any information.

5.2 Rules for Use of True Source Honey Collective Trademarks

5.2.1 Ownership and duration of use of Collective and Collective Membership Marks

- 5.2.1.1 Ownership of Collective Trademarks and the Collective Membership Trademark – the True Source Honey (TSH) Collective Trademarks and the True Source Collective Membership Trademark are owned by True Source Honey, LLC. Member Companies obtain no property rights in these marks.
- 5.2.1.2 Duration of Collective Trademarks and the Collective Membership Trademark Use – Member Companies shall have the right to use the TSH Collective Trademarks and the Collective Membership Trademark upon and for the duration of Membership.

5.2.2 Compliance with Rules of Use

- 5.2.2.1 Member Companies may only use the TSH Collective Trademarks and the Collective Membership Trademark in accordance with these rules of use, which are designed to protect the integrity and enhance the value of the TSH Collective Trademarks and the Collective Membership Trademark. A Member Company shall, for the duration of its Membership, follow the rules and regulations established by the True Source Honey LLC, its Operating Agreement and the decisions of its Board of Directors. Member Companies are also subject to the following obligations:
- 5.2.2.2 The TSH Collective Trademarks and the Collective Membership Trademark shall be used as follows:
 - a. Advertising Use of the Collective Trademarks – The Collective Trademarks may be used for the purpose of directly promoting and advertising honey or a honey product for sale. The Collective Trademarks may not be used on labels, containers, secondary packaging materials or other product configurations as intended for individual sale.

- b. Non-Advertising Use of the Collective Membership Trademarks – The Collective Membership Trademarks may only be used on items that do not directly promote and advertise honey or honey products. As an example and not meant as a limitation, the Collective Membership Trademarks may be used on letterhead, non-advertising signs, and business cards.
 - 5.2.2.3 Direct any inquiries regarding the intended use of the TSH Collective Trademarks and the Collective Membership Trademark to the Board of Directors of True Source Honey LLC, or their agents;
 - 5.2.2.4 Discontinue any use of the TSH Collective Trademarks and the Collective Membership Trademark to which TSH reasonably objects;
 - 5.2.2.5 Operate entirely within the scope of its Membership. Subsidiary companies and site addresses not included in the Certificate of Membership are not permitted to use the TSH Collective Trademarks and the Collective Membership Trademark;
 - 5.2.2.6 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 TSH Collective Trademarks and the Collective Membership Trademark for the purpose of confirming compliance with these rules; and
 - 5.2.2.7 Payment within the specified time of any fees set by TSH or as otherwise agreed to by the parties.
- 5.2.3 **Application of Rules of Use**
- 5.2.3.1 These rules regulate the use of TSH Collective Trademarks and the Collective Membership Trademark by Member Companies only. These rules do not regulate the use of the TSH Collective Trademarks and the Collective Membership Trademark by TSH or other entities licensed by TSH to use them, unless provided for in this or another document.
- 5.2.4 **Reproduction of Collective and Collective Membership Trademarks**
- 5.2.4.1 If a Member Company wishes to reproduce the TSH Collective Trademarks and the Collective Membership Trademark, it shall do so strictly in accordance with the requirements and specifications set out in Attachment A.
- 5.2.5 **Suspension or Withdrawal of Trademark Use**
- 5.2.5.1 The permission for a Member Company to use the TSH Collective Trademarks and the Collective Membership Trademark will be suspended if such company's Membership is suspended; and/or withdrawn, or if the Member Company's Membership is terminated, relinquished or not renewed. Conditions for suspending or withdrawing a Member Company's permission to use the TSH Collective Trademarks and the Collective Membership Trademark, include (but are not necessarily limited to):
 - a. Suspension if the Member Company breaches or fails to comply with these rules;
 - b. Withdrawal if the Member Company uses the TSH Collective Trademarks and the Collective Membership Trademark in a way that, in the opinion of TSH is detrimental to the TSH Collective Trademarks and the Collective Membership Trademark or TSH as a whole, is misleading to the public or otherwise contrary to law; or

- 5.2.5.2 Withdrawal if the Member Company has an administrator, receiver, receiver and manager, official manager or provisional liquidator appointed over its assets or where an order is made or a resolution passed for the winding up of the Member Company (except for the purpose of amalgamation or reconstruction) or the Member Company ceases to carry on its business or becomes bankrupt, applies to take the benefit of any law for the relief of bankrupt or insolvent debtors or makes any arrangement of composition with its creditors.
- 5.2.5.3 Upon termination of a Member Company's membership the Member Company must stop using the TSH Collective Trademarks and the Collective Membership Trademark for the duration of the suspension and must at its own expense isolate all goods, products, packaging, containers, stationery, publicity material and all other such items bearing or indicating the TSH Collective Trademarks and the Collective Membership Trademark during such period of suspension.
- 5.2.5.4 Upon termination of a Member Company's Membership, any goods, products, packaging, containers, stationery, publicity materials and all other such items bearing or indicating the TSH Collective Trademarks and the Collective Membership Trademark shall, at the Member Company's expense, be destroyed or disposed of, or be treated to have the TSH Collective Trademarks and the Collective Membership Trademark obliterated. The Member Company must also return to TSH or its agents the Collective Trademarks and the Collective Membership Trademark and computer media containing the TSH Collective Trademarks and the Collective Membership Trademark.
- 5.2.5.5 Upon withdrawal or during any period of suspension of a Member Company's Membership, the Member Company shall not, without the consent of TSH, sell, or expose for sale, any goods, products, or services bearing the TSH Collective Trademarks.

5.2.6 Right of Appeal

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

5.2.7 Notices and Register

- 5.2.7.1 Notices – any notice or other communication to be given or sent to TSH or the Member Company shall be deemed to be duly given or sent by pre-paid post, e-mail or facsimile transmission to the last known address of the party concerned.

5.2.7.2 Register – TSH shall keep a register, which is available for public inspection during normal business hours, at its offices containing the names, addresses and main business activity of Member Companies and a description of goods and services in relation to which the Member Companies are authorized to use the TSH Collective Trademarks and the Collective Membership Trademark, together with the date of Membership of the Member Companies and particulars of any withdrawals or suspensions of the Member Companies’ rights.

5.2.8 Amendment of Rules of Use

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

5.3 Rules for Use of True Source Honey Certification Trademarks

5.3.1 Ownership and Duration of use of Certification Marks

5.3.1.1 **Ownership of Certification Trademarks** – the TSH Certification Trademarks are owned by True Source Honey, LLC. Certified companies obtain no property rights in the TSH Certification Trademarks.

5.3.1.2 **Duration of Certification Trademarks Use** – Certified companies shall have the right to use the TSH Certification Trademarks upon and for the duration of certification.

5.3.2 Compliance with Rules of Use

5.3.2.1 Certified companies may only use the TSH Certification Trademarks in accordance with these rules of use, which are designed to protect the integrity and enhance the value of the TSH Certification Trademarks. A certified company shall, for the duration of its certification, prove to the satisfaction of TSH and the Licensed Certification Entity that its honey traceability system satisfies the requirements set forth in the current edition of the TSH Code, and a certified company must only use the TSH Certification Trademarks in accordance with its Certificate of Registration and these rules. Certified companies are also subject to the following obligations:

- a. All of a Certified Company’s products shall be in compliance with these rules of use. In cases where a Certified Company deals with both certified and uncertified products, it must ensure that the TSH Certification Trademarks are only used on certified products and that uncertified products are clearly identified as such. For example, if a certified honey Packer receives uncertified honey from Importer A and certified honey from Importer B, these must be clearly distinguished at point of sale;
- b. Direct any inquiries regarding the intended use of the TSH Certification Trademarks to the Licensed Certification Entity;
- c. Discontinue any use of the TSH Certification Trademarks to which TSH reasonably objects;

- d. Operate entirely within the scope of its Certificate of Registration, including the Registration Schedule. Subsidiary companies and site addresses not included on the Certificate of Registration are not certified to use the TSH Certification Trademarks;
- e. Provide TSH, the Licensed Certification Entity, 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 TSH Certification Trademarks for the purpose of confirming compliance with these rules and the Certificate of Registration; and
- f. Payment within the specified time of any fees set by TSH and/or the Licensed Certification Entity or as otherwise agreed to by the parties

5.3.3 Application of Rules of Use

5.3.3.1 These rules regulate the use of TSH Certification Trademarks by Certified Companies only. These rules do not regulate the use of the TSH Certification Trademarks by TSH or other entities licensed by TSH to use them, unless provided for in this or another document.

5.3.4 Reproduction of Certification Trademarks

5.3.4.1 If a Certified Company wishes to reproduce the TSH Certification Trademarks, it must do so strictly in accordance with the requirements and specifications set out in Attachment A.

5.3.5 Suspension or Withdrawal of Trademarks Use

5.3.5.1 The permission for a Certified Company to use the TSH Certification Trademarks will be suspended if such company's certification is suspended; and/or withdrawn if the Company's certification is withdrawn, relinquished or not renewed. Conditions for suspending or withdrawing a Certified Company's permission to use the TSH Certification Trademarks, include (but are not necessarily limited to):

- a. Suspension if the Certified Company breaches or fails to comply with these rules;
- b. Suspension if the Certified Company fails to use the TSH Certification Trademarks in accordance with its Certificate of Registration, including the Registration Schedule;
- c. Withdrawal if the Certified Company uses the TSH Certification Trademarks in a way that, in the opinion of TSH or the Licensed Certification Entity, is detrimental to the TSH Certification Trademarks or the honey traceability system as a whole, is misleading to the public or otherwise contrary to law; or
- d. Withdrawal if the Certified 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 Certified Company (except for the purpose of amalgamation or reconstruction) or the Certified Company ceases to carry on its business or becomes bankrupt, applies to take the benefit of any law for the relief of bankrupt or insolvent debtors or makes any arrangement of composition with its creditors.

5.3.5.2 Upon **suspension** of a Certified Company's certification the Certified Company must stop using the TSH Certification Trademarks 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 Certification Trademarks during such period of suspension.

5.3.5.3 Upon **withdrawal** of a Certified Company's certification of goods, products, packaging, containers, stationery, publicity materials and all other such items bearing or indicating the TSH Certification Trademarks shall, at the Certified Company's expense, be destroyed or disposed of, or be treated to have the TSH Certification Trademarks obliterated. The Certified Company must also return to TSH or its certifying Licensed Certification Entity its Certificate of Registration and computer disk containing the TSH Certification Trademarks.

5.3.5.4 Upon withdrawal or during any period of suspension of a Certified Company's certification, the Certified Company shall not, without the consent of TSH, sell, or expose for sale, any goods, products, or services bearing the TSH Certification Trademarks.

5.3.6 Right of Appeal

5.3.6.1 TSH or the Licensed Certification Entity shall give Certified Company written notice of its decision to suspend or withdraw the Certified Company's certification and shall provide together with such notice a copy of its appeals procedures.

5.3.6.2 A Certified Company may appeal against a decision to suspend or withdraw its certification. Written notice of an appeal must be received by TSH or the Licensed Certification Entity within 14 days of the date of the written notice of suspension or withdrawal and must set the grounds upon which the appeal is based.

5.3.6.3 After receiving the notice of appeal, TSH or the Licensed Certification Entity must either:

- a. Give notice to the Certified Company that it has reversed in decision to suspend or withdraw the Certified Company's certification; or
- b. Refer the appeal to independent adjudication or arbitration in accordance with its appeal procedures.

5.3.7 Notices and Register

5.3.7.1 **Notices** – any notice or other communication to be given or sent to TSH or the Certified Company shall be deemed to be duly given or sent by pre-paid post, e-mail or facsimile transmission to the last known address of the party concerned.

5.3.7.2 **Register** – the Licensed Certification Entity shall keep a register, which is available for public inspection during normal business hours, at its offices containing the names, addresses and main business activity of Certified Companies and a description of goods and services in relation to which the Certified Companies are authorized to use the TSH Certification Trademarks, together with the date of registration of the Certified Companies and particulars of any withdrawals or suspensions of the Certified Companies' rights.

5.3.8 Amendment of Rules of Use

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

5.4 Financial Audit Criteria – High Risk Countries

5.4.1 India

- 5.4.1.1 Grant Thornton (GT) has been exclusively nominated by True Source Honey, LLC(TSH) for the purpose of conducting Financial Audit (Audit) for companies interested in applying for TSH certification in India.
- 5.4.1.2 The purpose of the Audit is to determine that only honey of Indian origin is exported as “Product of India” to the United States.
- 5.4.1.3 GT will conduct the Audit for the interested companies on behalf and as per the guidelines of TSH. However, the audit fees are to be borne by the individual companies. TSH will neither guarantee nor be responsible for any fee or related payments. The fees will be negotiated directly on a case by case basis between GT and the individual company.
- 5.4.1.4 GT will conduct the Audit for the sole purpose of establishing origin of honey exported by the Exporter.
- 5.4.1.5 GT will conduct rigorous check on the company’s financial accounts, books and records to determine if any duty free import from any origin has been done by the Exporter for the purpose of re-export to any origin. The check will be conducted regardless of whether the Exporter has declared this product only as “Product of India” or whether there is a mention of import on the export documents.
- 5.4.1.6 GT will also consider imports from countries where India has a duty-free bilateral trade agreement/ SAARC countries. These may also be treated as imported honey.
- 5.4.1.7 The term “Import for the Purpose of re-export” would broadly cover any re-export, whether the imported product is re-exported as it is/ re-packed / or blended with Indian honey in any ratio.
- 5.4.1.8 GT will determine the exact nature and manner of duty free import – through Import License/ Import Bond/ EOU/ EPZ / SEZ etc.
- 5.4.1.9 In case of imports by EOU/ EPZ/ SEZ companies, the burden is on the applicant to convince GT that the honey imported by them was for domestic use after paying the prevalent duties. If this burden is not met, the same may be treated as import for purpose of re-export.
- 5.4.1.10 GT will determine the exact volume and amount of duty free honey imported and how the import obligation was completed. Whether any duty was paid on the said imported honey and if some quantities were sold in the domestic tariff area after paying prevalent duties. Honey sold in the DTA after payment of duties maybe exempt from the category of “Re-exported honey.”
- 5.4.1.11 GT will conduct a complete audit for past two (2) calendar years from the date of application to TSH for the above.
- 5.4.1.12 GT will only determine whether the applicant has been in the business of re-exporting honey from India as “Indian Origin” from India during the above mentioned period.
- 5.4.1.13 GT may access all relevant information for the purpose of carrying out their Audit, however no financial data shall be disclosed to TSH.

- 5.4.1.14 GT will work in close coordination with Intertek who is the third party Traceability Auditor for TSH.
- 5.4.1.15 GT will only certify to Intertek whether the applicant company is PASS/ FAIL as per above checklist and the reason thereof. All financial findings/data are to be maintained confidential and not shared with anyone including Intertek and TSH.
- 5.4.1.16 GT may use the services of any of their departments for the above-mentioned Audit – Tax/ Assurance/ Advisory, etc.
- 5.4.1.17 All associated/ related companies of the Exporter engaged in similar/ same business to be covered in the Audit.

5.5 Future Program Elements

- 5.5.1 Product Purity
- 5.5.2 Residues
- 5.5.3 Labeling Requirements for Resale.

Section 6 – Additional Information

6.1 Approved Pollen Analysis Laboratories

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

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

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

6.2 Examples of Required Documentation

6.2.1 Customs Form CBP 3461

U.S. DEPARTMENT OF HOMELAND SECURITY
Bureau of Customs and Border Protection

Form Approved
OMB No. 1651-0024

ENTRY/IMMEDIATE DELIVERY 0071 108389904
PAPERLESS
MANIFEST HOLD AGR
ABI CERTIFIED
FDA MAY PROCEED




19 CFR 142.3, 142.16, 142.22, 142.24

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

Paperwork Reduction Act Notice: This information is to determine the admissibility of imports into the United States and to provide the necessary information for the examination of the cargo and to establish the liability for payment of duties and taxes. Your response is necessary. The estimated average burden associated with this collection of information is 15 minutes per respondent depending on individual circumstances. Comments concerning the accuracy of this burden estimate and suggestions for reducing this burden should be directed to Bureau of Customs and Border Protection, Information Services Branch, Washington, DC 20529, and to the Office of Management and Budget, Paperwork Reduction Project (1651-0024), Washington, DC 20503.

CBP Form 3461 (01/89)

6.2.2 Ocean Bill of Lading

Consignor/Shipper				
PROCESSOR/EXPORTER				
Consigned to order of				
TO ORDER OR IMPORTER'S NAME				
Notify address				
IMPORTER'S NAME IF OCEAN BILL OF LADING MADE TO ORDER				
Ocean vessel		Place of receipt HOCHIMINH CITY	PLACE OF RECEIPT AND PORT OF LOADING MUST BE IN THE COUNTRY OF ORIGIN OF THE HONEY	
		Port of loading HOCHIMINH CITY		
Port of discharge HOUSTON		Place of delivery HOUSTON		
Marks and numbers	Number and kind of packages	Description of goods	Gross weight	Measurement

TRLU123456
SEAL : 00824

65 DRUMS VIETNAMESE HONEY
Processor/Experte Lot#:

TRUE SOURCE ID # : XXXX
(SEAL #)

ORIGINAL

according to the declaration of the consignor

Declaration of interest of the consignor in timely delivery (Clause 6.2) <input style="width: 100%; height: 20px;" type="text"/>	Declared value for ad valorem rate according to the declaration of the consignor (Clauses 7 and 8) <input style="width: 100%; height: 20px;" type="text"/>
---	---

The goods and instructions are accepted and dealt with subject to the Standard Conditions printed overleaf.

Taken in charge in apparent good order and condition, unless otherwise noted herein, at the place of receipt for transport and delivery as mentioned above. One of these Multimodal Transport Bills of Lading must be surrendered duly endorsed in exchange for the goods. In Witness whereof the original Multimodal Transport Bills of Lading all of this tenor and date have been signed in the number stated below, one of which being accomplished the other(s) to be void.

Freight amount USD AS PER AGREEMENT	Freight payable at ORIGIN	Place and date of issue
Cargo insurance through the undersigned <input checked="" type="checkbox"/> Not covered <input type="checkbox"/> Covered according to attached Policy 3		Stamp and signature
Number of Original BL's THREE		
For delivery of goods please apply to:		

AS AGENT



ANALYSIS REPORT No. 110218334

DATE: 18.02.2011

PAGE 1/2

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



FAX:
 E-Mail:

Our reference no.	: PI110214118		
Product	: Honey		
Sample description / Batch	: CERTIFIED TRUE SOURCE ID #		
Sample received on / transported by	: 14.02.2011 via courier	Seal	: seal no. 01N617
Sample temp. when received / stored	: Room temperature	Sampling by	: INTERTEK
Packaging / Quantity	: plastic vessel / approx. 200g	Start / End of analysis	: 15.02.2011 / 18.02.2011

ANALYSIS REQUESTED: Pollen - geographical origin of honey

Pollen by Microscopy: DIN 10760 (a)

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

Yeast content - estimated slightly increased (<500.000/10g)

Starch (referring to pollen content): very low (< 5%)
 (inhouse procedure 3110.037) (a)

Organoleptic Analysis: (a)

Colour: light
 Consistency: liquid
 Odour: typical for honey
 Taste: sweet, caramellike, herbal

Sediment: (a)

Honeydew elements: crystalline matter
 Others: vegetable fibres

Electr. conductivity: 0.23 mS/cm
 (inhouse procedure 3110.042) (a)

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

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

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

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



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

Interpretation:

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

Katja Bohm
Staatl. gepr. Lebensmittelchemikerin / Prüfführerin

6.2.5 Certificate of Origin From B (Vietnam)

<p>1. Goods consigned from (Exporter's business name, address, country)</p> <p>Processor/Exporter Name: Address:</p>		<p>Reference No.</p> <p style="text-align: center; font-size: 1.2em;">16230441</p>					
		<p>CERTIFICATE OF ORIGIN <i>(Combined declaration and certificate)</i> FORM B Issued in Vietnam</p>					
<p>2. Goods consigned to (Consignee's name, address, country)</p> <p>Importer Name: Address:</p>		<p>4. Competent authority (name, address, country)</p> <p>CHAMBER OF COMMERCE & INDUSTRY OF VIETNAM HO CHI MINH CITY BRANCH 171 Vo Thi Sau Str., 3rd Dist, Ho Chi Minh City, Vietnam Tel: 84.8.9326498, 84.8.9325989, 84.8.9326598 Fax: 84.8.9325472 Email: vcci-hcm@hcm.vnn.vn</p>					
<p>3. Means of transport and route (as far as known)</p> <p>Vessels: BUXLAGOON V.81113R B/L No: PFSPHI 140090 Date: April 02, 2011 Port of loading: HOCHIMINH CITY, VIETNAM Port of discharge: PHILADELPHIA, USA Place of Delivery: PHILADELPHIA, USA</p>		<p>5. For official use</p>					
<p>6. Marks, numbers and kind of packages; description of goods</p> <p>PURE UNADULTERATED BEES HONEY- ORIGIN VIETNAM</p> <table border="0" style="width: 100%;"> <tr> <td style="width: 50%;"> <p>MARKING: BEES HONEY FROM VIETNAM LOT NUMBER: TH.14 DRUM NUMBER:</p> </td> <td style="width: 50%;"> <p>MARKING: BEES HONEY FROM VIETNAM LOT NUMBER: DRUM NUMBER: 65 DRUMS</p> </td> </tr> <tr> <td> <p>NW: 300KGS/DRUM GW: 317KGS/DRUM TARE: 17KGS COLOR: LIGHT AMBER ODEM10030/PO #4913/1</p> </td> <td> <p>NW: 300KGS/DRUM GW: 317KGS/DRUM TARE: 17KGS COLOR: LIGHT AMBER ODEM10030/PO #4913/2</p> </td> </tr> </table> <p>CONTRACT NO(S). PC 4913</p> <p>CONTAINER NO / SEAL NO: ORIGINAL</p> <p>CUSTOMS DECLARATION FOR EXPORT COMMODITIES NO.: 23422/XKD01 DATE: March 30, 2011</p> <p>SHIPPER'S FDA REGISTRATION NUMBER:</p>		<p>MARKING: BEES HONEY FROM VIETNAM LOT NUMBER: TH.14 DRUM NUMBER:</p>	<p>MARKING: BEES HONEY FROM VIETNAM LOT NUMBER: DRUM NUMBER: 65 DRUMS</p>	<p>NW: 300KGS/DRUM GW: 317KGS/DRUM TARE: 17KGS COLOR: LIGHT AMBER ODEM10030/PO #4913/1</p>	<p>NW: 300KGS/DRUM GW: 317KGS/DRUM TARE: 17KGS COLOR: LIGHT AMBER ODEM10030/PO #4913/2</p>	<p>7. Gross weight or other quantity</p> <p style="text-align: center;">N.W: 39,000.00 KGS G.W: 41,210.00 KGS 130 DRUMS</p>	<p>8. Number and date of invoices</p> <p style="text-align: center;">No. Dated: March 30, 2011.</p>
<p>MARKING: BEES HONEY FROM VIETNAM LOT NUMBER: TH.14 DRUM NUMBER:</p>	<p>MARKING: BEES HONEY FROM VIETNAM LOT NUMBER: DRUM NUMBER: 65 DRUMS</p>						
<p>NW: 300KGS/DRUM GW: 317KGS/DRUM TARE: 17KGS COLOR: LIGHT AMBER ODEM10030/PO #4913/1</p>	<p>NW: 300KGS/DRUM GW: 317KGS/DRUM TARE: 17KGS COLOR: LIGHT AMBER ODEM10030/PO #4913/2</p>						
<p>9. Certification</p> <p>It is hereby certified, on the basis of control carried out, that the declaration by the exporter is correct.</p> <div style="text-align: center;">  <p>TRẦN THỊ NGỌC HẰNG P.P. SECRETARY GENERAL HO CHI MINH CITY, April 07, 2011</p> </div>		<p>10. Declaration by the exporter</p> <p>The undersigned hereby declares that the above details and statements are correct; that all the goods were produced in Vietnam and that they comply with the origin requirements specified for goods exported to USA.</p> <div style="text-align: center;">  <p>HUY HOÀN HO CHI MINH CITY, April 07, 2011</p> </div>					

6.2.6 Truck Bill of Lading

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

6.2.7 Delivery Order

DELIVERY ORDER

**CUSTOM
BROKER**

DATE: 07/27/2010
 SHIPPER NO.: 1218
 REF. NO.: 0071108154430
 AGENTS NO.:

THE INFORMATION INDICATED BELOW WILL BE INTERPRETED
 PERMITTED AS FOLLOWS: IF NOT IN ACCORDANCE PLEASE
 CONTACT US

TO DELIVERY CLERK: IF PROPER IDENTIFICATION YOU MAY DELIVER THE CARGO
 DESCRIBED BELOW TO THE CARRIER IMMEDIATELY.

CONSIGNEE: **PACKER**

IMPORTER

LOCATION: C095 PACKER AVE CONTAINERS	ENTRY NO./DATE
IMPORTING CARRIER	FROM PORT OF: HO CHI MINH CITY (SAIGON), VIETNAM
BILL OF LADING AIR WAYBILL SEE BELOW	DATE OF ARRIVAL: 07/22/2010
	LAST FREE DAY

NUMBER PACKAGES	DESCRIPTIONS	WEIGHT	RATE	UNIT COL.	FREIGHT CHARGES
PAGE 1 of 1	65 DRUMS VIETNAMESE BEES HONEY TRLU123456 SEAL : 00824 PROCESSOR/EXPORTER LOT # TRUE SOURCE ID # : XXXX (SEAL #) IN CASE THE CONTAINER IS DELIVERED DIRECTLY TO PACKER, THE DELIVERY ORDER IS REQUIRED				

SEE FREIGHT CHARGES TO

<p>UPS SUPPLY CHAIN SOLUTIONS, INC. WILL NOT BE RESPONSIBLE FOR ANY DEMURRAGE, LOADING OR OTHER CHARGES NOT AUTHORIZED IN ADVANCE.</p> <p>SHIPPER: UPS SUPPLY CHAIN SOLUTIONS, INC. AS AGENT FOR SHIPPER NAMED ABOVE.</p> <p>PER: _____ DATE: _____</p>	<p>The agreed or declared value of the property is hereby stated by the shipper to be not exceeding \$_____ per</p> <p>CARRIER: 1</p> <p>AGENT: _____ PEE: _____ DATE: _____</p>	<p>* TWO ORIGINAL DELIVERY ORDERS ALL OF THIS TENOR & DATE HAVE BEEN ISSUED, ONE OF WHICH BEING ACCOMPLISHED, THE OTHER TO STAND VOID.</p> <p>CONSIGNEE: RECEIVED IN GOOD ORDER AND CONDITION EXCEPT AS NOTED</p> <p>SIGNATURE: _____ DATE: _____</p>
---	---	---

INBOUND WAREHOUSE RECEIPT

NOTICE OF RECEIPT

TO: **IMPORTER**

MANIFEST:
YOUR REF:
DATE:
SEAL: 00624

SUPPLIER:
CARRIER:

CONTAINER: **TRLU123456**

SEQ	ITEM NO / REFERENCE	DESCRIPTION / EXCEPTIONS	PIECES		PALLETS		
			-MANIP-	TYP	--REC--	-MAN--	-REC--

65 DRUMS VIETNAMESE HONEY

Processor/Exporter Lot #:

TRUE SOURCE ID # : XXXX
(SEAL #)

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

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

6.3 Logo Design – Color/Ratio (Attachment A)

The True Source Certified™ Logo shall appear as below and have an aspect ratio of 3 Inches in height to 3.83 inches in width (or equivalent when scaled) and shall consist of the following colors: Red 485, Green 5757, Yellow 116



The True Source Honey™ Logo shall appear as below and have an aspect ratio of 3 Inches in height to 6.32 inches in width (or equivalent when scaled) and shall consist of the following colors:

