

True Source Certified Provisional Standard: War in Ukraine

Effective July 1, 2025 through June 30, 2027

Annual Recertification Audits and Initial Certification Audits

Audits should occur on-site if possible, however it would be assumed that most if not all activity in Ukraine is currently unsafe for auditors to conduct on-site audits.

Virtual Audits

Under the assumption that any facility actively shipping certified loads is in operation and staffed, a virtual audit conducted by local Certification Body offices must occur in place of an on-site audit. Virtual audits must be conducted using video facility tours and electronic verification of records.

Auditor Training

Under the provisional standards, new auditors may be trained and qualified to perform virtual audits by participating in virtual shadow audits with a qualified auditor. Once the provisional standards expire, auditors who have not yet conducted physical site audits must re-certify through participation in live audits with a qualified auditor.

Load Inspection and Sampling

No high-risk load inspections will take place. Any high-risk load shipped without inspection must be clearly identified in accompanying documents as “No Inspection Conducted”.

Upon arrival in North America, loads identified as “No Inspection Conducted” must be tested by the Packer using LC-IRMS and HRMS for authenticity and Pollen Analysis or NMR for origin confirmation. Records of testing must accompany the documents retained for each load. During a packer audit, as part of sample selection and testing, at least one non-inspected load must be identified and sampled if in current inventory. The selected load will be tested using LC-IRMS and HRMS for authenticity and Pollen Analysis or NMR for origin confirmation.

Warehouse Transfers

Shipping documents may show transfers from Exporter facilities in Ukraine to bordering countries. Documents detailing such transfers must be maintained to preserve traceability from the originating facility. Any such loads are required to meet the above testing requirements and having done so will be considered fully compliant.

True Source Seals and Chain of Custody

In the event that loads transit a third country and the True Source seal is broken/removed from the load, the shipper must include a declaration describing the removal of the original seal and noting the identity of the replacement seal.

Suspension of Provisional Standards

At such time as normal activity resumes, as communicated by True Source Certified, all requirements will be in full effect.