

# **True Source Certified<sup>™</sup> Standard**

## Annex A

## Standard for "Made with True Source Honey" Claim

## 1. PURPOSE

This annex provides verification criteria and assessment procedures for North American operations seeking to make an on-package "Made with True Source Honey" claim regarding the honey used in the processing/manufacturing of their ingredients or finished product(s). The Made with True Source Honey certification program is designed to establish trust with consumers on the origins and authenticity of the honey containing products they buy. Operations may have products certified to this Standard alone or as an Addendum to the True Source Certified Honey Standard.

## 2. SCOPE

The Made with True Source Honey Claim certification process applies to North American operations that process, package and/or sell consumer goods products, either at their own or contracted facilities, who aspire to present a promotional, on-package or sales claim regarding the use of True Source certified honey in their products. Any operation seeking certification shall procure, manufacture and sell products in a way to meet applicable compliance criteria in the version of the Standard as well as requirements outline in this Annex. The scope includes aspects of the operations from sourcing to selling the products.

## **3.** References

- a. True Source Certified Standard
- b. Certification Body Policies and Procedures Document

## 4. **DEFINITIONS**

- Also See True Source Certified Standard
- **Audit/review**: A systemic evaluation to determine if programs and related activities achieve planned expectations including the review or challenge of written programs, documentation of activities, corrective actions, and trends to determine the correlations between documented procedures and activities and actual execution.

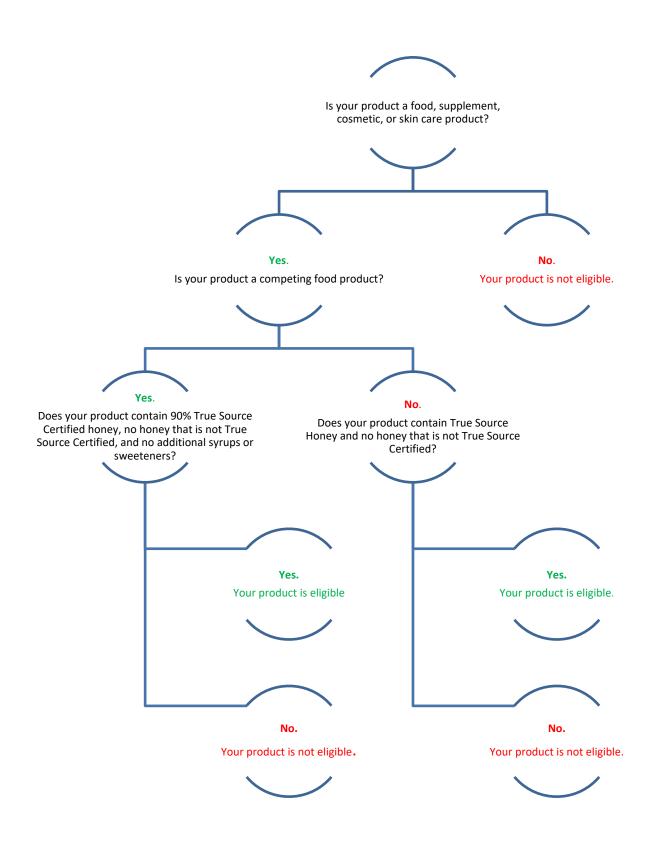
- Batch or lot: A specific quantity of a finished product or other material that is intended to have uniform character and quality, within specified limits, and/or is produced according to a single manufacturing order during the same cycle of manufacture.
- Competing food products: Any sweetening agent that has been designed, developed, sold, distributed, or marketed that is functionally similar to honey. Competing food products may include: Honey infused products. Honey enhanced or containing flavorings, fruits, spices, or seasonings. Honey spreads or creamed honey with added flavors. Syrups, agaves, molasses, artificial honey, honey sauces, honey substitutes and other natural or artificial sweeteners.
- **Dedicated facility:** A facility that only sources, stores, and produces True Source Honey products or exclusively produces products that are only True Source Honey.
- Dedicated production line: A production line that only sources, stores, and produces True Source Honey products or exclusively produces products that are only True Source Honey.
- Eligible food products:
  - (1) "General food stuffs" that use 100% TSC honey as the honey ingredient; and
  - (2)"Competing food products" that contain no less than 90% pure True Source Certified honey by volume and contain no additional honey that is not True Source Certified, syrups, or sweeteners.
    - Examples include but are not limited to: Honey infused products. Honey enhanced or containing flavorings, fruits, spices, or seasonings. Honey spreads or creamed honey with added flavors.
- **Finished product**: A product requiring no further processing prior to sale to the consumer.
- **General food stuffs**: Any food product that contains honey but is not a competing food product of honey. Examples may include but are not limited to: Breads, meats, cereals, yogurts, and wines.
- Ineligible competing food products: Products containing less than 90% by volume pure TSC honey. Competing food products that function similarly to honey but are not 100% pure TSC honey. Examples of ineligible competing food products may include but are not limited to: Syrups, agaves, molasses, artificial or natural sweeteners, artificial honeys, honey sauces, or honey substitutes.
- Inspection: An extensive desk audit and/or physical examination of ingredient volumes, label accuracy, facilities including equipment and observation of practices conducted to collect information to determine compliance with plant programs and structured to often lead to an evaluation of programs and systems.
- Lot number: A distinctive combination of letters, numbers or symbols, or any combination thereof from which the complete history of the manufacture, processing, packaging, holding, and distribution of a batch or lot of a finished True Source Honey ingredient or other material can be determined.

- Manufacture or manufacturing: All operations associated with the production of True Source Honey ingredients or finished products including formulations, packaging, labeling, testing, and quality control of a True Source Honey ingredient or finished product.
- Non-dedicated (or shared) facility: A facility that produces both True Source Honey and non-True Source Honey products; this may include a facility that contains dedicated equipment or uses shared equipment.
- **Non-dedicated production line**: A production line that produces both True Source Honey and non-True Source Honey products; this may include a facility that contains dedicated equipment or uses shared equipment.
- **Participating Entity (PE):** Packaged Consumer Goods Entity seeking Certification.
- **Products**: For the purpose of this program, products include food, supplements, cosmetics, and skin care products.
- **Input material:** An ingredient intended for use in the manufacture of a True Source Honey product including those that may not appear in such finished product.
- **Shared equipment**: Equipment used in the manufacture of True Source Honey products that is also used in the manufacture of non-True Source Honey products.

## 5. REQUIREMENTS

Products eligible for Made with True Source Honey certification must meet the following requirements:

- Eligible products include food, supplements, cosmetics, and skin care products.
- Eligible products must contain True Source Certified honey and no other sources of honey. Eligible products cannot contain any honey that is not True Source Certified
- Eligible food products that are competing food products, i.e. sweetening agents that are functionally similar to honey, must contain no less than 90% True Source Certified honey and no additional syrups or sweeteners.
- True Source Certified Honey used in eligible products must be purchased from True Source Certified Brand Purchasers and Packers.



## 6. DEMONSTRATE COMPLIANCE

Element	Guidance			
1) Reporting Relationship	Operation			
a) Reporting relationship/structure of how True Source systems are communicated amongst the operation	Operation shall have a reporting structure describing how True Source operations are executed. Roles and responsibilities shall be defined and departments identified for carrying out True Source operations for all requirements listed in this Annex. should include a description of how the commitment to True Source products fits into the overall structure of the operation, statement of management commitment to True Source.			
2) Risk Assessment and	Operation			
Management				
a) Operation flow chart and formula specifics	Operation shall have a detailed flow chart for their operations as related to production of products with the True Source Claim.			
b) Product Development	True Source Certified Products shall have detailed formulas on file that outline all ingredients used in preparation of the product. The True Source Certified product shall be in compliance with the applicable requirements True Source Protocol. The operation shall have a procedure in place to identify contamination risks during the development or modification of new formula.			
c) Supplier Management and Procurement	Operation shall procure ingredients for the True Source Certified honey products shall be in compliance with the True Source Standard policies. Operations shall have a list of all suppliers on site and available during inspections.			
d) Monitoring Procedures	Operation shall have monitoring procedures as they pertain to ensuring that True Source compliance plan is followed and True Source integrity is maintained. Operation shall review and update the Compliance Plan at least annually.			
e) Inputs	<ul> <li>Producers/processors/manufacturers shall only source compliant inputs to ensure that the products meet certification specifications. Compliance of ingredients may be demonstrated, as appropriate or required by the Program Requirements, by:         <ul> <li>Certified Certificate from the supplier demonstrating conformance to the Standard.</li> </ul> </li> </ul>			
3) Operational Controls	Operation			
a) Method for confirming True Source integrity of all ingredients, or final products	Operation shall have a list of all ingredients, including % of honey, and suppliers shall have a program in place that confirms the True Source integrity of all ingredients and finished products.			
b) Comingling and/or cross-contact prevention of ingredients and finished products from receipt, preparation, and selling	Operation shall designate preparation areas or procedures designed to minimize cross contamination as applicable. Workflows should be identified to avoid possible contamination.			
c) Comingling and/or cross-contact prevention of packaging materials and storage containers	Operation shall identify, develop and implement procedures to reduce cross contact risks involving packaging materials and storage containers.			
d) Measures in place to prevent cross contamination of True Source ingredients during transport	Operation shall have Procedures in place to ensure that True Source integrity has not been compromised during transportation and storage. This includes distribution centers.			

e) Measures in place to distinguish a True Source product from a non- True Source product	Operation shall have a system in place to distinguish prepared True Source from a non-True Source product.		
f) Equipment and Utensils Cross- Contact Controls	Operation shall develop written protocols for preventing cross contamination and cross contact from equipment and utensils.		
g) Product Integrity	Consumer package goods companies must have a method for confirming the integrity of all inputs or final products <b>containing honey</b> sourced under claims.		
4) Packaging Materials	Operation		
a) The types and Locations of packaging materials and storage containers used for storage of ingredients	Operation should have procedures in place to identify suitable packaging materials and storage containers to minimize cross contact.		
b) Measures in place to prevent contamination of packaging materials or storage containers	Operation shall have a program in place to distinguish ingredients and finished products that are True Source		
c) Ingredient Labeling	Operation shall have an effective program and training system in place to ensure that team members can efficiently and effectively identify True Source Honey from non-True Source Honey.		
d) Ingredient Storage	Operation shall develop an ingredient storage program to avoid cross contamination. If possible, store True Source honey above non-True Source Honey. Consider all containers or packaging used for incoming products, WIP, temporary or final packaging.		
e) Open Containers	Operation shall develop control procedures for transferring ingredients from containers such as buckets totes, drums, boxes.		
f) Changeover	Segregation and changeover methods should be in place to ensure that Non- certified Products are not falsely bearing the Made with True Source Honey Claim.		
5) Cleaning and Sanitation	Operation		
a) Cleaning and sanitation method(s) and procedure(s) used to prevent comingling and cross- contamination	Operation shall have a cleaning and sanitizing plan designed to effectively remove, clean and sanitize food contact and critical non-food contact surfaces and equipment used in the product of True Source Certified products.		
b) Methods to demonstrate consistent sanitation procedures	Operation shall have in place a method for verifying the effectiveness of cleaning.		
6) Product Testing and Prevention Procedures	Operation		
a) Internal product monitoring and testing program/procedures including test method, frequencies, and limit of rejection	Operation shall have a testing program in place that identifies the test method, frequency, limit of rejection and disposition of product.		
7) Record Keeping	Operation		
a) Method for maintaining (onsite) all documents to demonstrate compliance	<ul> <li>Operation shall have a documented and traceable plan for demonstrating True Source integrity from purchasing to sales. Method for maintaining (onsite) all documents to demonstrate compliance.</li> <li>TS Honey Product Specifications</li> <li>TS Honey approved supplier list</li> <li>TS Honey Purchase/Receiving Records, Transactions Certificates, Shipping Record, PO, BOL, Invoice, TS Certificates</li> <li>TS honey purchase records</li> </ul>		

b) Written policies or SOPs to preserve True Source integrity of the finished product	<ul> <li>TS Honey "Made with" Product List</li> <li>TS Honey "Made with" Formulations including % honey used in each product</li> <li>All honey/honey flavored ingredients in inventory</li> <li>List of all non-TS honey containing products</li> <li>Label accuracy of TS Honey "Made with" products</li> <li>Operation shall have a program in place to address customer complaints, their resolution and investigation.</li> </ul>				
c) Documentation for storage facilities	Operation shall have an agreement in place with storage facilities to address traceability.				
d) Record retention related to True Source	Records shall be maintained by the operation for 2 years to demonstrate compliance with the True Source standard. Such as training records, pre-op inspection sheets, food safety records.				
e) Verification of traceability	<ul> <li>Ability to trace materials from receiving through sale via linked lot/production numbers on process paperwork.</li> <li>Example:         <ul> <li>Shipment/load/order level detail</li> <li>PO# or Invoice</li> </ul> </li> <li>Verification of receiving/storage procedures</li> <li>Verification of supplier selection and monitoring procedures         <ul> <li>Product specifications, Certificate of Analysis, Maintenance of records regarding purchases, certificates, applicable test reports</li> </ul> </li> <li>Method for complying with audit for production batch records of "made with Products"</li> <li>Method for controlling non-conforming products.         <ul> <li>Records of "product hold" incidents</li> <li>Records of disposition of non-conforming inputs or products</li> <li>Records of destruction of non-conforming inputs or</li> </ul> </li> </ul>				
8) Training and Knowledge Verification	products where required Operation				
a) Procedure for training all personnel on True Source protocols b) Verification of Knowledge	Operation shall have appropriate training program provided for personnel carrying out the tasks critical to effectively carry out True Source honey integrity. Training program shall be documented. Operation shall have an employee training program this is documented and implemented. Training records must be signed.				
c) Management of training records	Operation shall have training materials and the delivery of the training provided in language understood by staff.				
9) Quality	Operation				
a) Disposition Plan for non- compliant product	In the event that a finished product is labeled with Made with True Source Honey Claim but does not meet the requirements for use of the mark or claim, the operation shall properly control and document this disposition of non-compliant product(s). The client may also submit a deviation request to the Certification Body.				

	<ul> <li>Disposition notice must include, but is not limited to:         <ul> <li>Confirmation of destruction, repack into packaging not bearing True Source Made With Mark for diversion to conventional sale, if permitted by law, of the non-compliant product</li> <li>Confirmation that the non-conforming product shall not bear the Statement on any failed finished product, or make any related claims, or references to approval of or verification by The Certification Body</li> <li>Other requirements of The Certification Body, as applicable.</li> <li>Contact is only necessary if a deviation is requested. All other activities must only be documented.</li> </ul> </li> </ul>	
b) Finished products	An Operation shall perform internal quality control monitoring on each production run of certified product to verify compliance with Program Requirements. A product may not make a claim if monitoring detects non-conforming product(s).	

## 7. AUDITOR/INSPECTOR COMPETENCY

Inspector or auditor employed or contracted by The Certification Body and approved for the "Made with True Source Honey" Program Requirements shall be assigned to perform required on-site inspection.

The Certification Body shall ensure all assessors are trained and competent in the requirements of the "Made with True Source Honey" Program Requirements and activities to be performed.

## 8. FACILITY COMPLIANCE

- a) INITIAL QUALIFICATION
  - A. Application Review
    - i. Review application, Product List, TS Honey Certificates, Product Profile (Formulations), Labels applied to TS "Made with" products
    - ii. Signed Quote and Master Terms and Conditions
  - B. Audit
    - i. Follow audit checklist
    - ii. Review Batch Records
    - iii. Mass Balance
    - iv. Perform Trace back
    - v. Identify Non-Conformances
  - C. Project Management
    - i. Follow up with Client on Corrective Actions
    - ii. Client resolve Corrective Actions
  - D. Certification Decision
  - E. Certificate Issues

All production locations shall undergo an initial document review (desk audit) and a facility inspection. This facility inspection will include an audit for production batch records of "Made with True Source Honey" products, verification of % TS Honey used in formulation, a trace back audit, a Mass/Balance audit, label accuracy, etc.

Note: North American Packers who have successfully completed a True Source Certified audit and are currently True Source Certified are not required to participate in an Initial Qualification Made with True Source Honey audit

- Certified facilities consistent with the requirements of this standard may process, package, or manufacture "Made with True Source Honey" products
- Certification Body and/or product registration fees associated with the program must be paid
- A client Account form and traceability worksheet for each product type must be submitted to the Certification Body
- Upon submission, review, and approval of the aforementioned requirements, a True Source Certified North American packer is authorized to display the "Made With" logo on the qualifying products

If the Certification Body determines the facility has demonstrated effective implementation of the program requirements and is able to maintain compliance, and upon payment of fees due, The Certification Body shall issue a certificate and letter declaring the operation as certified True Source Certified and authorized to bear the True Source Made with mark and claim on authorized, listed products.

The Certification Body may delay this determination and conduct an additional inspection at the operation's expense if it is determined that the operation may be able to comply but requires improvements in the requirements of the program. All non-conformances shall be resolved prior to receipt of certification.

The Certification Body reserves the right to deny certification to the Made with True Source Honey claim Program if the operation is unable to comply with the Program Requirements. An operation is free to reapply at any time if certification has been denied.

b) CERTIFICATION RENEWAL

In order to maintain certification to the Made with True Source Honey Standard, the operation must participate in an onsite audit at least every two years. The customer would be subject to a desk audit in between the 2-year period.

Note: North American Packers who have successfully completed a True Source Certified audit and are currently True Source Certified will not require a separate audit but will be required to demonstrate compliance with all Made with True Source Honey audit requirements every 2 years as an addendum to their True Source Certified North American Packer audit.

If it is determined that the operation requires improvement to remain in compliance with the requirements of the True Source Certified program, The Certification Body reserves the right to suspend the participant's certification and delay renewal in order to conduct an additional inspection at the participant's expense.

All non-conformances shall be resolved prior to reinstatement and/or renewal of the Participant's acceptance in the Verified Control Program.

Verification audit may be bundled with existing audit or conducted as a standalone audit.

### 9. LABELING

a) BUSINESS TO BUSINESS "MADE WITH TRUE SOURCE HONEY" CLAIMS

This applies to honey suppliers wishing to market and sell True Source Certified Honey as an ingredient to manufacturers. Any claim in a business-to-business transaction must be accompanied by True Source Honey certificate and transaction documents. Any use of marks or claims in business-to-business transactions must abide by the Certified Standard and Use of Marks guidelines.

- b) LABELING OF CERTIFIED "MADE WITH TRUE SOURCE HONEY" products shall be in accordance with Appendix A
  - Any product that bears the Made with True Source Honey Mark or claim in its labeling, and fails to comply with the requirements, will be deemed to be noncompliant.
  - Any permitted deviations from the True Source label, logo or claims requirements are detailed in Annex B. If an operation wishes to request a variance not mentioned in Annex B, the operation shall submit the variance request using a form supplied by The Certification Body. The Certification Body will consider requests but is not obligated to grant the variance, and will not be obligated to return any portion of the fees paid if the applicant or participant chooses to discontinue participation in the program.
  - The Certification Body shall not be responsible for any costs incurred by applicants or participants related to the printed labels which are the subject of rejected variance request or other product non-compliance. It is the applicant's responsibility to ensure it has received written confirmation of label compliance by The Certification Body prior to printing participating product labels.

## **10.**REQUEST FOR VARIANCE

Requests will be submitted by the CB to True Source LLC. True Source LLC reserves the right to review and approve all such requests for variance.

## 11. ANNUAL REVIEW OF MADE WITH TRUE SOURCE HONEY CERTIFICATION PROGRAM

Review of Made with True Source Honey claim certification requirements will take place periodically and any changes in requirements shall be communicated to the Participants with 30 days of finalized changes with an effective date no sooner than 90 days from the notification date. Participants shall be required to demonstrate at the next annual monitoring that changes were implemented within 90 days of receipt of the Notice of Changes.

### Appendix A. Use of the Made with True Source Honey Mark and Claim

### Terms of Use "Made with True Source Honey" logo

### Introduction:

The "Made with True Source Honey" logo is for use by True Source Certified food processors only who have successfully completed a "Made with True Source Honey" Certified audit.

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

The "Made with True Source Honey" logo must be used correctly to protect the integrity of the logo and the program.

The following guidelines must be strictly observed when using the "Made with True Source Honey" logo.

#### Logo Applications:

The "Made with True Source Honey" logo may only be applied to products that use exclusively True Source Certified Honey as the honey ingredient and have passed the Made with True Source Honey Certified audit. These products may include foods, supplements, pharmaceuticals, cosmetics, and skin care products.

- Competing food products shall contain no less than 90% pure True Source Certified Honey by volume and shall contain no additional syrups or sweeteners. The honey used in the "eligible competing food product" must be 100% TSC honey. Examples of eligible competing food products may include but are not limited to: Honey infused products. Honey enhanced or containing flavorings, fruits, spices, or seasonings. Honey spreads or creamed honey with added flavors.
- General foodstuffs that contain 100% True Source Certified Honey as the honey ingredient. Examples may include but are not limited to: Breads, meats, cereals, yogurts, wines.
- Supplements, pharmaceuticals, cosmetics, and skin care products that contain 100% True Source Certified Honey as the honey ingredient for enhancement and/or functionality of the products.

Except for the eligible competing food products identified above, the "Made with True Source Honey" logo may not be used on any ineligible competing food product that functions similarly to honey that is not 100% pure TSC honey. Examples of ineligible completing food products may include but are not limited to: Syrups, agaves, molasses, artificial or natural sweeteners, artificial honeys, honey sauces, or honey substitutes.

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

The "Made with True Source Honey" 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.

The artwork used in the application of the "Made with True Source Honey" logo must be supplied by True Source Honey, LLC. and follow the graphics Terms of Use as specified within this document (including 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.

### Logo Specifications:

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 "Made with True Source Honey" 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.

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

### **Colors & Typography:**

Consistent use of colors and typefaces is essential to maintaining a clear and effective representation of the True Source Certified logos.

True Source Certified logo must always be in the colors and typefaces specified.

### Colors

Green	Yellow	Black	White
<b>RGB</b> = R-106, G-112, B-41	<b>RGB</b> = R-254, G-203, B-0	<b>RGB</b> = R-0, G-0, B-0	RGB = R-255, G-255, B-255
Hexadecimal = #6A7029	Hexadecimal = #FECB00	Hexadecimal = #000000	Hexadecimal = #FFFFFF
<b>CMYK</b> = 5C, 0M, 63Y, 56K	<b>CYMK</b> = 0C, 20M, 100Y, 0K	CYMK = 0C, 0M, 0Y, 100K	CYMK = 0C, 0M, 0Y, 0K
<b>PMS</b> = 5757	<b>PMS</b> = 116	<b>PMS</b> = 30	PMS = White

### Typography

Font type: Poster Sans Regular

When referring to "True Source Certified" in typeface, words shall appear in initial caps. In logo appearance, words shall appear in full caps as specified within this document. The preferred font is Poster Sans Regular. Words must use the specified colors when appearing in logo form.

Specific visual requirements have been established for the True Source Certified logos. The following sections discuss clear space and minimum size for the True Source Certified logos.

### **Clear space:**

The True Source Certified logo should never compete visually with other graphic elements. For this reason, clear space must be present with each representation of the True Source Certified logo and sufficiently allow for the full logo and supporting blank (white) background. No text or other graphics may appear in this area.

#### **Minimum Size:**

The print version of the logo can be reduced to a minimum size that maintains the structure of the logo with clear visible recognition. Logo use identified as not meeting the visual structure may be subject to revocation.



### Proportionate Size:

In all forms of use, the True Source Certified logo size shall be increased or decreased in direct relation to the original image provided to Certified members by True Source Honey, LLC. The shape and distinguishing size of the original image is:



1.23" height and 1.09" width7.38 pica height and 6.45 pica width31.2419mm height and 27.686 widthOnline: 93 pixel height and 82 pixel width @ 75 DPI

#### Logo Modification:

True Source Honey, LLC reserves the right to make minor modifications to the logo and will provide written notice of changes to True Source Certified Members. Members will be granted a reasonable timeframe to apply specified changes.

### Logo Ownership:

The "Made with True Source Honey" logos are owned by True Source Honey, LLC. The logos shall appear with the  $\ensuremath{\mathbb{R}}$  symbol, which indicates ownership and registration in the U.S. Patent and Trademark Office.

For use of the logo outside of the United States, please contact the Executive Director of True Source Honey LLC at <u>info@truesourcehoney.com</u>.

February 11, 2025