# HELPING INDUSTRY TURN DATA INTO INFORMATION.





# Product Information Form (PIF™) V6.0

Q & A

November 2019

For further information, to provide input into this document or further authorisation for use please contact the PIF Manager (PIF@afqc.org.au)



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# **PREFACE**

This document has been developed by the Australian Food and Grocery Council (AFGC) as a resource for the food industry and other stakeholders interested in the Product Information Form.

#### **Disclaimer**

The AFGC has shared this document on the basis and understanding that users exercise their own skill, care and judgement with respect to its use.

The guidance contained or referred to in this document is intended to support industry in the completion of the PIF V6.0. The AFGC provides no warranty or endorsement with regards to the materials contained within this document.

# Management of the PIF V6.0 Q & A

Ongoing support for the PIF V6.0 and its periodic review will be managed by the AFGC.

The AFGC has responsibility for maintenance of this document.

The AFGC will review and update this document from time to time so it is recommended that companies check the <u>AFGC website</u> regularly for updated versions.

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PIF™ and ePIF™ are trademarks of the Australian Food and Grocery Council.

# **ACKNOWLEDGMENT**

The AFGC wishes to acknowledge the significant input and contribution of the *PIF Review Working Group*. Their collective industry expertise and experience as key stakeholders has been invaluable.

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#### AFGC AUTHORISED FOOD DATA SYSTEM®

# What is the AFGC Authorised Food Data System®

The AFGC Authorised Food Data System – the home of PIF™ V6.0 and just the beginning of the tools AFGC are developing to help industry turn data into information.

Look out for this logo which is available exclusively to our approved PIF V6.0 vendors.



PIF V6.0 is the first tool in the AFGC Authorised Food Data System portfolio.

The AFGC has commenced work on the development of a complementary Facility Information Form (FIF) and a Packaging Specification System (PaSS). Both of these initiatives will run off the same platform as the PIF, further streamlining the communication of necessary information and data through the supply chain.

# **PIF V6.0**

# What is PIF V6.0?

PIF V6.0 is the most comprehensive update in the history of the PIF.

The PIF structure has been changed to take advantage of the online platform to better organise the data and improve the workflow.

Provision for Country of Origin labelling information, the Health Star Rating front of pack labelling scheme and data to support health claims are all enhancements present in PIF V6.0. The treatment of allergens has been restructured to better facilitate allergen traceability and the genetic modification (GM) section has been completely restructured to make it clearer and simpler.

Importantly, the data system underlying PIF V6.0 is radically different from the Excel spreadsheet used for previous versions of the PIF. It is more structured and enhances interoperability with other data systems whether in-house or external.

PIF V6.0 features updated content and has been translated to business-to-business software solution to replace the current stand-alone Excel spreadsheet. PIF V6.0 has been developed to streamline the process of recording and reporting product information via secure online portals, making it easier and faster to use.

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PIF V6.0 is no longer a "one size fits all" and will feature options for:

- Samples
- Flavours
- Ingredients, and
- Retail Ready products.

Each of these variations provide differing levels of detail.

The content covered by PIF V6.0 retains and builds on PIF v5 and includes:

- Ingredient declaration breakdown
- Country of Origin to meet the new requirements which come into effect in July 2018
- Allergen and food safety declarations including ANZ and International allergens and information to support VITAL®
- Pre-market clearance GM and Novel foods
- Quarantine and biosecurity
- Nutrition Information
- Nutrition, health and related claims
- Front of pack labelling Health Star Rating Labelling (voluntary) and Daily Intake
- Certification and Endorsement information
- Shelf life
- Traceability information
- Measurement marking
- · Potential safety hazards, and
- · Packaging.

It will be accessed via online portals rather than as the current stand-alone Excel spreadsheet.

#### What are the benefits of PIF V6.0?

PIF V6.0 streamlines the process of recording and reporting product information, making it easier and faster to use. There is no need to retype information from supplier and customer PIFs into company systems as the information is able to be exchanged between companies via the PIF portals – meaning less opportunity for inadvertent transcription errors to creep into the data.

Furthermore, information stored in a company's PIF portal may be searchable (depending on the level of access), enabling much better use of data than is possible with the standalone, Excel PIFs.

# Is the PIF Mandatory?

No, it is **not mandatory** and there is no regulatory requirement to complete a PIF. There is a legal obligation that data required for legal compliance must be provided to a business customer on request, and the PIF is one way of meeting this obligation but it is not the only way.

The PIF is an industry-agreed questionnaire intended to be used by companies to provide a wide variety of standardised information about food products and ingredients in a single document that meets the information needs for legal and regulatory compliance.

Your customers may request information to be provided via a PIF, but this is not a regulatory requirement.

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#### PIF ONLINE OR ePIF

#### What is PIF online or ePIF?

PIF online or ePIF is the new way to access, complete and share information held in the updated version of the PIF – Version 6.0.

Instead of completing the Excel spreadsheet users log on to one of the online portals and enter the information directly.

# What is a PIF online portal?

A PIF portal is a platform that will be offered by a number of providers, called Vendors, which will enable the online compilation, storage and transmission of PIFs. The portal will take your PIF data send it out, when and to whom you decide to send it, in a standardised computer to computer communication protocol called XML. A portal, for example, might also note when you have updated a PIF and ask you whether you want to send the update to some or all the people to whom you have sent the earlier version. It will not send any PIF out without your express approval to do so. A portal can also receive PIFs from your suppliers.

# **ACCESS TO PIF V6.0**

#### How will companies' access PIF V6.0?

PIF V6.0 will be available online from the Vendors who choose to implement it.

Internet browser software and an internet connection are all that will be required to access a portal.

There are three Vendor companies currently authorised by the AFGC to deliver PIF V6.0 online:

**Bizcaps Software** 

**Hamilton Grant** 

Oak Barrell

Further information on each of the Vendor companies is available on the AFGC website.

#### Why was a multi-vendor model chosen rather than AFGC building a portal?

The AFGC is not an IT company and does not have expertise in this area. While the AFGC could have partnered with just one company to provide the PIF, it is concerned to ensure that the PIF portals on offer cater for the variety of different industry needs – businesses range from the large to the small, their processes run from simple record keeping through to automated recipe management and flow controls, and they use anything from less than 10 to more than 1000 PIFs. By having a number of Vendors, the AFGC is seeking to make available a range of PIF portal solutions that are scalable and adaptable to meet the needs of this varied demand, as well as providing competition in the market around the product offering.

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# Who approves the PIF Vendors? Who monitors their performance?

The AFGC retains intellectual property in the PIF V6.0 system and will license Vendors to use the "AFGC Authorised Food Data System" logo.

Vendors will only be able to use the logo once their PIF portal has passed AFGC testing.

The AFGC will continue to monitor PIF user satisfaction through surveys and contact mechanisms such us <a href="PIF@afgc.org.au">PIF@afgc.org.au</a> to monitor Vendor performance and to continue to improve and expand on the food data system functionality.

# How do I access a PIF portal?

Internet browser software and an internet connection are all are required to access a portal.

Your company will need to decide which Vendor portal best suits your needs and enter into a commercial agreement with them.

# Will you have to pay or buy a program to use the online PIF?

Yes, there will be a cost to use the PIF portal chosen by your Business.

You will need to discuss the cost with the Vendor that you choose to implement the PIF portal.

# Do companies have to use one of the Vendor Portals?

Full functionality of the PIF V6.0 can only be accessed through one of the Vendor Portals supported by the AFGC's Authorised Food Data system.

# What is the "Data Dictionary"?

The Data Dictionary is the part of the PIF system that sets out in technical terms the form and content of the data that is to be stored and communicated. In its simplest terms, it is a list of the data fields contained in a PIF.

# Will the Data Dictionary be available to companies?

The Data Dictionary may be made available to AFGC members under a non-disclosure agreement where there is the need to enable the development of in-house databases that are compatible with PIF portals. This allows companies to have a single source of data that can be used for multiple purposes, including communicating with PIF portals.

# Do companies need to use more than one of the portal options?

No. Each company needs to choose only one portal. All portals will be able to exchange PIF information.

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#### My company only receives PIFs, we do not generate them - do we need a portal?

That depends on how you use PIFs. You should be able to receive a PIF as a PDF without needing a portal, but the additional functionality of a portal will allow you to potentially integrate receiving PIFs into your own business systems (with appropriate safeguards), leading to improved data accuracy and efficiency. There may be good grounds to acquire a PIF portal even if you are simply a receiver of PIFs.

That said, the new PIF V6.0 also allows the creation of PIFs for retail products, and so is the opportunity for retail product manufacturers to create and issue PIFs when they perhaps have not done so up until now.

# All my suppliers are overseas, how will they send me a PIF V6.0?

You should discuss this with the various Vendors to find a solution that works best for your business model as there are a number of ways this situation might be addressed. For example, you might be able to provide your overseas supplier with a log on for your own PIF portal, allowing them to enter data directly into your system. If the supplier deals with a number of Australian customers, they might consider acquiring a PIF portal. It is anticipated that some vendor solutions might offer translation functionality so that the PIF might be completed in a language other than English, which again might further facilitate overseas use of the PIF portal.

#### Can people in my Company access the PIF portal?

Access will depend on the functionality of the portal you acquire, but Vendors will offer multi-user access control allowing different users to create, approve and/or issue PIFs.

# Can people outside of my Company access our PIF portal?

No, unless you consent to such access by giving the person a log in for your portal. In this, the PIF portal is like any other business software, with a high level of security around who can access the system.

#### Can I access another companies PIF portal?

No. You can receive a PIF from that portal if the company agrees to issue it to you, but you cannot access a PIF or a portal without the consent of the portal owner who will have to provide you with a log in. Even so, the level of access that you have will be dictated by the company.

# Why can't I develop a PIF portal in-house?

This should **not** be seen as a cheaper or easier alternative to a Vendor supplied portal. It may in fact be more expensive to develop and maintain an in-house system than to use one of the commercial portals, and it would require a significant commitment of IT and technical resources both initially and into the future as updates to the system are made.

# What would be the format that can be used to export out from the in-house portal. Is there any requirement to update/upgrade the in-house system?

The AFGC has developed an XML message format which incorporates all of the data which can be entered into the PIF V6.0. This message will be used to import data from a PIF portal into an in-house system and will also be used to export PIF data from an in-house system to send to a portal.

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#### COST

#### What will it cost?

There will be a cost for using a PIF V6.0 portal.

The AFGC does not, and cannot legally, set or control the price that Vendors charge for their portals.

## Why do I have to pay now when the PIF has always been free to access?

The AFGC has managed and maintained the PIF since 2004 providing a free resource to the food industry. To offer a more streamlined and user-friendly format for the PIF, the AFGC has engaged with external providers with expertise in this area. AFGC has funded this work during development and will continue to do so through providing support to PIF User companies and to oversee updates of the PIF V6.0 system.

The cost of the PIF is for access to the vendor online portals – these companies have invested resources and expertise to develop the portals to provide a streamlined process for recording, reporting and sharing product information, making it easier and faster to use.

The AFGC considers, however, that such costs will be outweighed by the resource savings currently attributed to recording and communicating current PIF data.

# Does the creator or recipient of the PIF pay?

The entity acquiring the portal will pay for their PIF portal, this will usually be the PIF creator, but PIF recipients may also choose to acquire a portal for their own businesses where it is more efficient to do so.

# This just seems to be a way for the AFGC to make money by charging for the PIF

The AFGC will receive license fees from approved Vendors in order to continue to maintain and expand the Food Data System. The AFGC continues to be a not-for-profit entity where all funds received go to member and industry initiatives.

The AFGC does not, and cannot legally, control the price that Vendors charge for their portals, but acknowledges that Vendors will seek a t return on their investment.

# WHAT ARE THE FEATURES OF PIF V6.0?

# Will PIF V6.0 include the new Country of Origin (CoOL) requirements?

Yes, the AFGC CoOL PIF addendum has been incorporated into PIF V6.0.

#### Will I be able generate nutrition information?

This will be a feature which can be provided by the Vendors as part of their portal offering. You will need to check with the vendors to determine if they can provide this functionality.

#### Will it calculate the Health Star Rating (HSR)?

No. The AFGC does not control the algorithm used to calculate the HSR – that is done by the Commonwealth Department of Health - and so the algorithm cannot be hardwired into the PIF.

PIF V6.0 does have links to the Department's website where HSR calculations can be undertaken and includes a data field to record the HSR result.

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#### How will attachments be sent?

Attachments to a PIF will be embedded into the message for transmission of the PIF. These attachments will be available to the PIF recipient immediately within the destination portal on receipt of the PIF message. The system allows for up to 10MB of attachments made to each PIF.

# For updated or replacements for expired attachments/certificates – do you reissue the PIF or just the attachment?

It is up to you and your customers as to how you want to do this.

#### Can you import PIF data into the VITAL® online calculator?

No. The AFGC does not control the calculator used in VITAL® online – that is done by the Allergen Bureau.

PIF V6.0 does have links to the <u>Allergen Bureau's website</u> where VITAL® calculations can be undertaken, and includes a data field to record the results.

# Will my portal retain and archive my PIFs?

Data retention, searching and archiving are all functions that will be offered by Vendors, you should talk with them to find a system that meets your needs.

The AFGC does not seek to specify these functions in too much detail as different companies have different needs.

# How long will a PIF be in a portal?

This will be up to the individual Vendors and it is recommended that you discuss this with them.

# **INFORMATION EXCHANGE**

# How are PIF's sent from portal to portal?

PIFs are sent using a secure, industry standard protocol just like many other business to business systems.

#### **PIF v5 CHANGES**

# What has changed from PIF v5.0 to PIF V6.0?

PIF V6.0 is the most radical update in the history of the PIF.

The PIF structure has been changed to take advantage of the online platform to better organise the data and improve the workflow.

Origin labelling information, Health Star Ratings and data to support health claims are all enhancements present in PIF V6.0. The treatment of allergens has been restructured to better facilitate allergen traceability and the GM section has been completely restructured to make it clearer and simpler.

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Importantly, the data system underlying PIF V6.0 is radically different from the Excel spreadsheet used for previous versions of the PIF. It is more structured and enhances interoperability with other data systems whether in-house or external.

The following figures show a comparison of PIF v5 to PIF V6.0. The updated PIF User Guide provides detailed information on the content of PIF V6.0.

# PIF v5

Section 1 - Contact Details & Declaration

Section 2 - Product Information & Ingredients



Section 3 – Compositional Information

**Section 4** – Foods Requiring Pre - Market Clearance

**Section 5** – Nutrients & Consumer Information Claims

# **PIF V6.0**

**Document Control** – PIF & Company

Section 1 - Company Information

Section 2 - Product Information

Country of Origin

Section 3 – Composition Information

VITAL & International Allergens

**Section 4** – Foods Requiring Pre-Market Clearance

Section 5 - Nutrition Information

Section 6 - Claims

#### PIF v5

**Section 6** – Durability, Packaging & Supply Chain



**Section 7** – Specifications for Compliance

Section 8 – Comments / Additional Information

# **PIF V6.0**

Section 7 - Shelf life

Section 8 - Traceability

Section 9 - Measurement Marking

Section 10 – Potential Safety Hazards

Section 11 - Packaging

Section 12 - Specifications for Compliance

**Section 13** – Company Specific Requirements

Section 14 – Extra comments & Attachments

**Section 15** – Summary of Statements & Claims

Section 16 - Checklist



# Is PIF V6.0 only for ingredients?

PIF V6.0 is no longer a "one size fits all" and will feature options for:

- Samples
- Flavours
- Ingredients, and
- Retail Ready products.

Each of these variations provide differing levels of detail.

# Why is there no compliance warranty in PIF V6.0?

The supplier declaration and warranty has been removed from PIF 6.0 because the PIF cannot self-prescribe its own legal status. The PIF has only that legal status that is accorded to it by parties to a transaction. For example, it is a common term in commercial agreements that the signed agreement embodies the whole of the agreement between the parties and no prior representations or documents are to have legal effect. In such circumstances, a pre-shared PIF is of no legal value irrespective of its compliance declaration.

By the same token, a PIF can be given status as an absolute set of warranties if that is the status accorded to it by the parties. A contract between manufacturer and ingredient supplier could very well either refer to a PIF, incorporate it by reference or include all its representations as conditions of a contract.

It is not appropriate for the AFGC to dictate the commercial arrangements between trading partners, and this is why the decision was taken to not include the declaration section in PIF V6.0 – in short, trading partners who want a PIF to be contractually enforceable can order their commercial terms to that purpose without the PIF self-dictating such an outcome, and conversely any PIF self-declaration of contractual warranty can be defeated by the commercial terms of trading partners.

The AFGC is aware that all those who share PIFs place value on the information provided and there is an intention and understanding that PIF information will be used by its recipient. These expectations may also give rise to legal rights in the event that PIF information turns out to be incorrect, but again the genesis of such rights lies in the relevant statute and case law and does not arise from the terms of the PIF itself.

For these reasons, the approach adopted for PIF V6.0 is that there is no compliance warranty.

#### PIF v5 - THE FUTURE

# Will the AFGC continue to support the current PIF v5?

As the AFGC webpage states, the AFGC now supports the online PIF V6.0 delivered through our licensed Vendors.

Updated content will only be delivered via PIF V6.0.

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#### Can I still use the PIF v5?

The AFGC recognises that the move to PIF V6.0 will take time and that PIF v5 will continue to be used in the meantime. However, it is worth restating that PIF v5 does NOT provide the data needed for full regulatory compliance and it will not be updated as new requirements come along. Consequently, the AFGC is no longer providing or supporting PIF v5.

#### **TRANSITION TO PIF V6.0**

#### Will companies be able to upgrade or import existing PIFs into the online portals?

Yes. The AFGC has developed a mapping tool for translation of information from PIF v5 to PIF V6.0 and has provided this to authorised vendors.

Only PIF v5 upload will be available. Earlier versions of the PIF will need to be converted to PIF v5 prior to uploading. PIF conversion files are available on request from the AFGC.

# How much of PIF V6.0 will be populated from PIF v5?

Approximately 55% of PIF V6.0 will be populated from PIF v5 as long as the PIF v5 version is complete.

PIF V6.0 manages the data more flexibly and in more detail, and so not all PIF v5 data will translate across. The PIF v5 import facility is intended more as a starting point for a PIF V6.0 dataset than a complete solution.

The main reasons for this are:

- New information added to PIF V6.0 such as updated country of origin information and nutrition, health and related claims, and
- Restructure of information in PIF v5 such as GM and allergen information.

# How do we capture the information for V6 that is not in v5?

As with any PIF update that expands the data requirements, you will need to contact your suppliers or producers to obtain data that is required for PIF V6.0.

#### Can we trial the online version to see if it addresses our needs?

This can be discussed with the portal vendors.

We would prefer to generate our own new PIF's, rather than use an external company to do it for us.

Companies will still be generating their own PIFs and deciding to whom they will be sent. You are not paying a Vendor to create your PIFs for you, you will be acquiring a portal to enable your PIFs to be transmitted securely, as well as access the additional functionality offered by Vendors in areas such as data archiving and searchability.

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#### How long do we have to transition to PIF V6.0?

The AFGC is not mandating a transition period and recognises that each company will have different needs and different levels or resources to facilitate the transition.

It is up to you to plan and implement your transition to PIF V6.0. You will need to talk with your suppliers and customers about their needs as part of your transition planning.

# What if my suppliers or customers do not want to use PIF V6.0? How will I send or receive PIFs?

One philosophy underlying PIF V6.0 is that companies hold 'one true source' of product information that can be used for multiple purposes. The PIF is simply one way in which that data can be used, but it will not be the only way. The AFGC's intent is to work towards full interoperability with systems run by GS1 and the retailers, and any specific needs of your suppliers or customers could also be met using this 'one true source'. However, you will need to liaise with those suppliers and customers directly as to how the product data will be shared if not using PIF V6.0.

If your suppliers do not want to have their own PIF V6.0 portal, then you may consider providing them access to your company's portal to upload PIF V6.0 information.

If your customers do not have a PIF V6.0 portal, then you can discuss with your portal provider alternative options for sending data from your portal.

# **TRAINING**

#### Will there be training?

Yes. The AFGC will provide training, as will the Vendors.

Details of training is available on the AFGC website and from the portal Vendors.

#### **DATA SECURITY**

How secure is PIF V6.0? Will our company data be secure in the cloud? How secure is the data transmission?

The data storage and transmission protocols are as secure as other modern business systems.

Your Vendor can provide specific information on their product.

#### **PERFORMANCE**

How stable will the portal be and how many users can be active at any one time?

These are matters to discuss with the individual Vendors, but the technologies underlying PIF V6.0 are well established, scalable and are relied upon by businesses and institutions throughout the world.

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# **PIF V6.0 SUPPORT**

# How will the PIF be managed going forward?

The AFGC will retain ownership of the content (required data items) of the PIF and any additional "add ons" and will manage updates in line with regulatory requirements or enhancements identified through feedback from the user community and Vendors.

Authorised PIF Vendors delivering the online solutions will be required to incorporate updates to ensure that information is current and compliant.

If there are any changes to the PIF in the future, the Vendors and those using in-house systems will need to synchronise the testing and introduction of the new version.

# How do I request changes to the PIF?

AFGC will continue to provide support for the data item requirements of the PIF and any requests for content changes can be made to the AFGC via <a href="PIF@afgc.org.au">PIF@afgc.org.au</a>

# How often will changes be made to the PIF V6.0?

It is expected that updates will be made annually unless there is a major change required due to changes in regulation.

Changes to the operation of the portals will need to be requested via the vendor that you are using.

#### What if there is a support related issue?

AFGC will continue to provide support for the content (data item requirements) of the PIF via PIF@afgc.org.au

Technical support should be covered under the agreement that a business has with their chosen vendor.

If you choose to use an in-house solution you will need to rely on your in-house IT support.

# What happens if my supplier does not complete the PIF correctly?

As with previous versions of the PIF, you will need to take this up with your material or product supplier.

# Will the AFGC conduct audits of PIF information?

The AFGC has never audited the accuracy of PIF information, which is and will remain the responsibility of the issuer to ensure accuracy and the receiver to undertake assurance.

#### **FURTHER INFORMATION**

PIF@afgc.org.au

AFGC website - PIF V6.0

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