The AFGC's Product Information Form V6 – concept to reality

Words by Dr Geoffrey Annison

It's hard to believe that the Australian Food and Grocery Council's (AFGC) Product Information Form (PIF) is approaching its 20th year in supporting the food industry's need to pass product information up and down the supply chain in a standardised format.

It was a world first in 2003 when released as an MS-WORD™ document (Product Information Version 1; PIF V1), and in its latest form, PIF Version 6 (Release 6.1), it remains world-leading. It was conceived as a hands-on tool for R&D and scientific and regulatory affairs staff to stay up to date with, and ahead of, food regulatory changes for product specific information across the whole supply chain. During successive versions of the PIF, the regulatory scope and functionality have been updated in deep consultation with food industry representatives from a wide range of food companies.

By 2012 the PIF v5 had become a complex, interactive MS-EXCEL™ spreadsheet which, while fit-for-purpose in its content, was ill-suited to the growing demand from industry for high levels of data security, and interoperability with company-level IT systems. Following extensive exploration of the options, and discussions with industry experts, it was decided to build a completely new version of the PIF, from the ground up, which would be available in an on-line format. By then, on-line data collection, collation and transmission was becoming more commonplace with many business-to-business examples (eg. in finance).

Efficiency of system use, maintenance of data integrity and security of data storage and transmission were agreed upon as foundation design attributes of the new electronic PIF, PIF V6 or the e-PIF.

PIF V6 was launched at the Australian Institute of Food Science & Technology Convention in July 2017.

As the concept of the on-line PIF was being developed, rapid changes in demand for information about food products were also occurring at the consumer level. Heightened awareness and interest in the provenance of food products, the technologies used in their production and the sustainability of food systems have driven consumers' expectations and demands for detailed information about the foods they buy.

Apart from going on-line, the PIF V6 is a game-changing advance over previous versions. Its scope, functionality, security features and futureproofing are a quantum-leap ahead of previous spreadsheet versions. Dealing with these in turn, firstly, the scope of the information included in the PIF is about 25% greater than covered by the previous PIF v5. It covers all information required about food products necessary to assure regulatory compliance with the Australia New Zealand Food Standards Code (FSC), Country of Origin Labelling (CoOL) requirements and the Health Star Rating (HSR) front-of-pack nutrition labelling and much more.

Specifically, PIF V6 retains and builds upon PIF v5 (now withdrawn) and includes information to support:

- Ingredient declaration breakdown
- CoOL
- Allergen and food safety declarations (ANZ and international allergens and information to support the Allergen Bureau's VITAL® program)
- Pre-market clearance – genetically modified, irradiated and novel foods
- Quarantine and biosecurity
- Nutrition information
- Nutrition, health and related claims
- Voluntary front of pack labelling – HSR labelling and the Daily Intake Guide
- Certification and endorsement information
- Shelf life specifications
- Traceability information
- Measurement marking
- Potential safety hazards
- Packaging information (see the AFGC website for listing).

In line with the 'future proofing' concept, PIF V6 also includes an option to report 'added-sugar' content. Caution must be exercised here as a regulatory definition of added sugar has not been determined. The issue is currently being considered by Food Standards Australia New Zealand (FSANZ) under *Proposal 1058 Added Sugar Labelling*.

Turning to functionality, the on-line portal systems allow companies to create, store, edit and exchange the PIF V6 between businesses. Accessed through any web-browser, the system can be used in a 'standalone' environment. That is, there is no need for it to be integrated with other company IT systems. It can be run completely independently. Alternatively, it can be used to exchange information with other internal company IT systems (ie. information can be imported to complete PIFs, or exported from PIFs as required by other company-level IT functions). Interoperability is provided through the PIF system using standardised data exchange protocols.

Functionality is also enhanced through four types of PIF being offered through the PIF system. These are PIFs for:

1. **Samples** – for new product development and showcasing product prototypes
2. **Flavours** – reflecting the limited data set required for these types of products
3. **Ingredients** – providing downstream customers information to assist them to meet the regulatory requirements of finished products
4. **Retail ready products** - information assisting with regulatory compliance and integrity of consumer ready products.

Security of data has been front and centre of considerations during the development of the PIF V6. The AFGC is acutely aware of the commercially sensitive nature of product information, and the on-line PIF system has a number of design elements intended to safeguard individual PIFs and the data they contain. Those design elements include:

1. Data entry through bespoke, secure on-line portals and highly secure cloud storage provided by AFGC-licensed and well-established business solution software providers under the auspices of the *AFGC Authorised Food Data System*®
2. Restricted access to portals and individual PIFs, ie. hierarchical password protected access providing PIF creating, read-only, edit, approval and PIF-sending and receiving permissions determined by food company management
3. Sharing of PIFs through portal-to-portal transmission. This does away with the notoriously risky sharing of soft copies of PIFs by email, or by hard copy, which occurred with earlier PIF versions. PIF V6 can, however, be downloaded from portals as PDF files and shared, but this is not recommended.

The on-line portal system is the foundation of the futureproofing of the PIF system. It is designed to be upgradable and expandable. Some of this will be obvious to users through upgrades to improve useability or to keep pace with regulatory developments, while other changes in the 'back-end' will be updates in software to keep pace with IT advances. The intent is to minimise the disruption to users as changes are introduced. Since its launch in 2017 the PIF system has been tested extensively to ensure its reliability and useability. This continuous commitment has already resulted in a number of minor adjustments and improvements to the system.

There was also a change in PIF content made in August 2022 to reflect the new mandatory allergen labelling requirements under *Standard 1.2.3 Information Requirement – warning statements, advisory statements and declarations*

following FSANZ's *Proposal P1044 – Plain English Allergen Labelling*. This change resulted in PIF V6, release 6.1. The notation signifies the substantial change in the PIF content. The timing of the change reflects August 2022 being halfway through the three year transition period for the new allergen labelling requirements which expires in February 2024. Further significant changes in content will be denoted by new release numbers.

With regard to more changes down the track, no major changes are currently envisaged. Regulatory changes in the FSANZ pipeline, or those of other regulatory agencies, are not expected to trigger substantial changes to the PIF content. There are, however, discussions on how the *AFGC Authorised Food Data System*® might expand. For example, work on a *Facilities Information Form*, or FIF, has commenced. This will contain key information about food production sites – that is, facilities – which may be important for business-to-business, and business-to-consumer

engagement.

For example, it may include production site certifications, such and halal or kosher, or it may have environmental sustainability certifications. Packaging information, or a 'packaging PIF' has also been discussed as a potentially useful addition. The guiding principle across the *AFGC Authorised Food Data System*® is the concept of 'one true source of data' within food companies supported by one-time manual data entry, flexible data sharing and strong protection for business efficiency and data security.

So how does it all work in practice? The *AFGC Authorised Food Data System*® is a collaboration between the AFGC and three software companies – Bizcaps Software, Hamilton-Grant, and Oakbarrel Software – which are licensed PIF V6 vendors. While all three offer on-line PIF management services (e.g. create, edit, send, receive, storage) through their individual bespoke PIF Portals, by operating to an AFGC functional specification, the portals act as both

a transmitter and receiver of PIFs. The PIF Vendors can provide advice to companies on becoming a PIF V6 user, and on integrating the PIF V6 system (ie. exchange data) with other IT systems companies may be using or with external systems.

A full description of the PIF system and supporting resources (factsheets, Q & A sheet, PIF user guide and webinars) are available from the AFGC website. Also on the website is a list of food companies, both large and small, which have joined the ever-expanding PIF V6 business community.

The last word: The AFGC strongly recommends that the ANZ food industry work together to implement the PIF V6 to ensure regulatory compliance and safety of food products to ease us into the future.

At the time of writing, Dr Geoffrey Annison was Deputy Chief Executive Officer & Director, Health, Scientific and Regulatory Affairs at the Australian Food and Grocery Council. ⓕ