

# THE AFGC PRODUCT INFORMATION FORM (PIF™ V6.0)



AFGC  
Authorised  
Food Data  
System®



## Product Information Form (PIF™) V6.0

### User Guide

*July 2023*

*For further information, to provide input into this document or further authorisation for use please contact the PIF Manager ([PIF@afgc.org.au](mailto:PIF@afgc.org.au))*

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## Preface

This **User Guide** has been developed by the Australian Food and Grocery Council (AFGC) as a resource for the food industry and other stakeholders to support the Product Information Form (PIF™) V6.0 and Release 6.1.

### Updates

This version of the PIF User Guide document replaces the previous version (4.0), May 2023. The changes are highlighted in pale blue.

### Disclaimer

The Australian Food and Grocery Council (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 User Guide

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 [AFGC website](#) regularly for updated versions.

### Terms of Use

This document is subject to copyright. You may download, display, print and reproduce this content for personal use or for use within a business but only in an unaltered form and with the copyright acknowledged. The document is not to be used for commercial gain through reselling, rebadging or inclusion in a commercially available information or management program.

*The AFGC Authorised Food Data System® is a registered trademark of the AFGC.*

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

### Legislative Compliance

This document is intended as a guide only - legal requirements are contained in the Australia New Zealand Food Standards Code (the Code) and other applicable State and Territory Food or Health laws as relevant to the jurisdiction within which goods are traded.

The information in this document should not be relied upon as legal advice or used as a substitute for legal advice. Skill, care, and judgement should be used before relying on this information in any important matter.

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## Terms and Definitions

Throughout this document, various terms are used. The meanings and definitions of these terms are given in **Appendix 1** – Terms and Definitions.

Any reference to the “the Code” refers to the [Australia New Zealand Food Standards Code](#).

Any reference to “Standards” or “Standard” refers to a food standard contained within the Australia New Zealand Food Standards Code.

Definitions relevant to the Australia New Zealand Food Standards Code can be found in [Standard 1.1.2](#) – Definitions used throughout the Code.

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*The term ‘PIF V6.0’ will be used throughout the Guide in reference to PIF V6.0 and PIF V6.0, Release 6.1.*

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## References

Throughout the Guide various documents are referenced. A summary of these documents and links to their source (where freely available) is provided in **Appendix 2** – References and Resources.

## Acknowledgment

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

## Contact

For further information, to provide input into this document or further authorisation for use please contact the AFGC on [PIF@afgc.org.au](mailto:PIF@afgc.org.au)

## Feedback and Updates

The AFGC is responsible for managing the PIF scheme ('the PIF') on an ongoing basis. If you have any comments or queries about the way the PIF is working, please forward your comments to the [AFGC](#).

The AFGC has established an [email list](#) specifically for PIF users and this is used to announce any updates or planned developments and any issues relevant to the PIF. Joining the list is free of charge and open to everyone, simply send an email to the [AFGC](#) and ask to be put on the list.

PIF V6.0 was released after development and upgrades of earlier versions and replaces PIF v5 and other earlier versions.

PIF V6.0, Release 6.1 has been updated to reflect the new mandatory allergen labelling requirements following the gazettal of Standard 1.2.3 Information requirements – warning statements, advisory statements, and declarations of the Australia New Zealand Food Standards Code. The gazettal incorporates amendments from the Food Standards (Proposal 1044 – Plain English Allergen Labelling) Variation.

Further updates to this Guide are anticipated over time, based on user feedback and queries, and in consideration of the need for further explanations and examples with respect to how to use the PIF.

## Change Request Process

The PIF Change Request Process is as follows:

1. The change requester completes the [PIF Change Request Form](#) which is automatically submitted to the AFGC.
2. The Change Request is logged in the PIF Change Request Register.
3. The change request is reviewed by the PIF Manager and if more information is required the form is sent back to the requester. The request may also be sent to the PIF Vendors and the PIF Implementation Group (PIFIG) to gain their input/advice.
4. The change required is then costed.
5. If the change and funding are approved, the Data Dictionary is updated, and changes logged as complete in the register.
6. The change requests will accumulate in the PIF Data Dictionary until AFGC, and the Vendors agree to issue an updated version to the Vendors.

Approval of the change is the responsibility of the AFGC, managed by the PIF Manager.

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***The most current version of the PIF is V6.0, Release 6.1 which was implemented in August 2022.***

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## Introduction

The PIF is a tool developed by the food industry in Australia and New Zealand to obtain and share information needed to meet obligations regarding food ingredients and finished products under regulatory requirements and industry codes in a consistent and standardised manner.

PIF V6.0 features updated content and is being translated to business-to-business software solutions 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.

PIF V6.0 is no longer a “one size fits all” as it now includes options for:

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

Each of these variations provide for differing levels of detail of information.

### Purpose

This Guide is intended to provide assistance and clarify the information to be provided in each section of PIFV6.0. The information and examples provided in this document are not exhaustive and should be considered as a guide only.

### Scope

This Guide is relevant to all sectors of the food industry involved in the supply, handling, production, distribution, and sale of foods.

### Structure of this Guide

The Guide is set up to follow the order of PIF V6.0. The numbering of the sections in this Guide reflects the numbering used in PIF V6.0.

For each section, the relevant regulatory requirements and industry guidance is set out in a table as follows, for example:

Standard/Schedule Number	Standard Name/Guidance
<b>ANZ Food Standards Code - 1.2.2</b>	Information requirements – food identification
<b>ANZ Food Standards Code – 3.2.2</b>	Food Safety Practices and General Requirements

Where possible, examples are provided however these should be considered examples only and not direction in relation to regulatory compliance.

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## PIF V6.0 Implementation Roadmap

The Implementation Roadmap has been developed to assist companies with the process of reviewing and implementing PIF V6.0.

The AFGC has a [webinar presentation](#) and supporting documents available to support companies with this process.

Figure 1: PIF V6.0 Implementation Roadmap

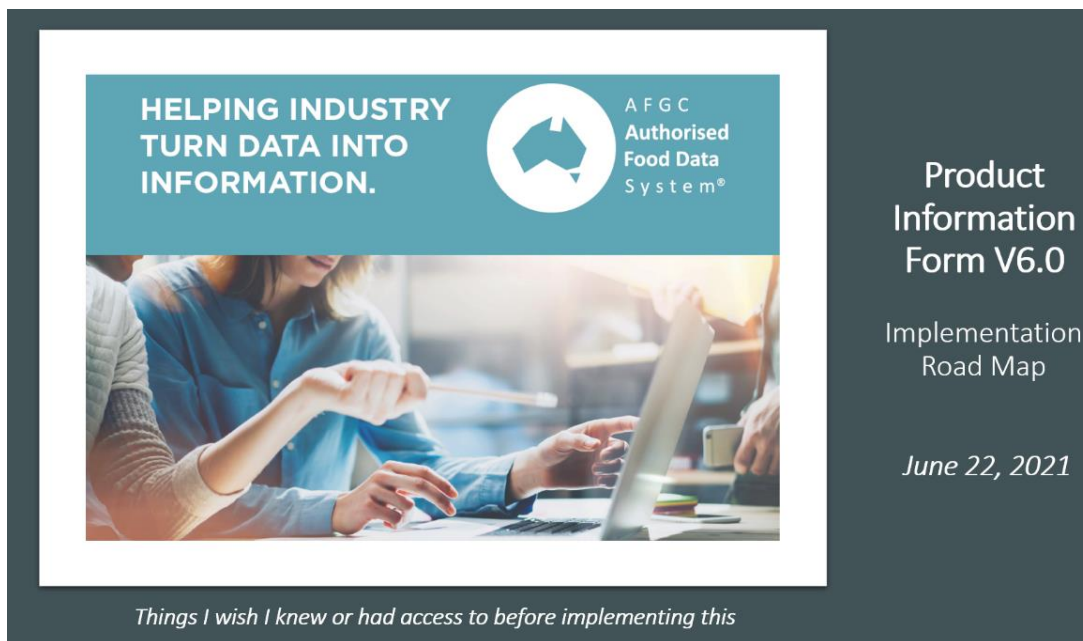
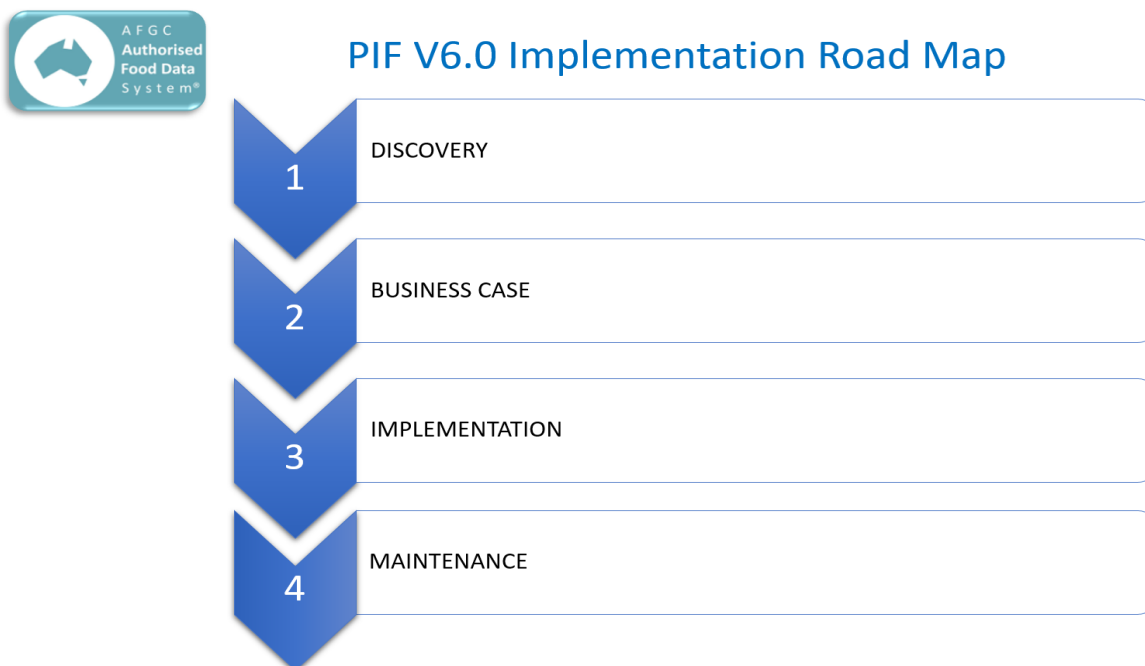


Figure 2: PIF V6.0 Implementation Roadmap Overview



## Completing PIF V6.0

### PIF Portals

PIF V6.0 has been designed to be delivered online - instead of completing the Excel spreadsheet, the user will log onto their choice of online portal and enter the information directly.

A PIF portal is an online interface offered by service providers, called Vendors. Portals provide for the online compilation, storage, and transmission of PIFs. The portals take company PIF data and send it to specified recipients in a standardised computer to computer communication protocol known as XML. Portals provide further functions, for example, they might record when a PIF has been updated and offer to send the update to some recipients of the earlier version. Information will not be sent without your express permission or approval to do so. Portals can also receive PIFs from suppliers.

PIF V6.0 is available online from the Vendors requiring only internet browser software and an internet connection. Each company needs to choose only one portal. All portals will be able to exchange PIF information.

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



**Bizcaps**  
 SOFTWARE



Companies will determine which Vendor portal best suits their needs and enter into a commercial agreement with them.

### Migration of Data to PIF V6.0 and V6.0, Release 6.1

The AFGC has developed a mapping tool for translation of information from PIF v5 to PIF V6.0 and has provided this to the authorised PIF 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. Approximately 55% of PIF V6.0 will be populated from PIF v5 if 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.

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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.

The PIF v5 import facility is intended more as a starting point for a PIF V6.0 dataset than a complete solution.

PIF v5's can still be loaded into the vendor portals to the latest PIF R6.1 version - discuss with your Vendor how this can be managed.

## Getting Started

### Supplier

Throughout this Guide the term “supplier” is used.

The supplier is the company or business **completing & issuing** the PIF V6.0.

### PIF V6.0 fields

The AFGC has developed the PIF V6.0 Data Dictionary which specifies the data field and attributes in PIF V6.0. The Data Dictionary specifies to the PIF V6.0 Vendors the data fields and attributes which are required to be available within their portals. Individual Portal Vendors may provide additional fields and data attributes over and above those which are specified by the AFGC. Companies should refer to the documentation provided by Portal Vendors or online help which may be available from the Vendors.

### Mandatory, Recommended and Optional Information

Information is entered into a PIF in response to series of questions and prompts. This information falls into three major categories.

#### System mandatory information

This information is critical for the functioning of the PIF allowing it to be exchanged between parties.

The following fields have been specified by the AFGC as system mandatory and **must be completed**. Without this information the PIF cannot be sent across the PIF system:

- Name Approved by
- Title Approved by
- PIF type
- Company Name
- Product Name
- Product Code

### Recommended information

Much of the information included in the PIF is required to demonstrate the regulatory compliance of products. It is recommended that all this information is provided in completing the PIF. Recommended information that is not completed will be identified – the manner of this identification will be portal dependant.

PIFs may still be sent if the recommended information is not complete.

### Optional information

Some fields are provided for addition of further information and completion is at the discretion of the user.

### **Dropdown lists**

To assist with completion of the PIF and for standardisation of information drop-down lists have been used within PIF V6.0. These lists can be amended and updated by the AFGC, and any change requests should be made to the AFGC via the [Change Request Process](#).

### **Hover text**

Hover text has been included in some sections of the PIF to provide explanations and assistance for some questions.

### **Section Comments and Attachments**

At the end of each section of the PIF there is the opportunity to add comments and attachments.

The comments sections can be used to provide further information and clarity in relation to that section.

Documents to support the information provided in a section can be added as attachments – for example: a HACCP certificate.

Each Vendor Portal may handle attachments in a different manor, so you will need to refer to Vendor user documentation.

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## PIF Header

### Logos

#### AFGC Authorised Food Data System®



The AFGC Authorised Food Data System logo is available exclusively to AFGC approved PIF V6.0 vendors ONLY.

#### Company Logo

The supplier's company logo can be inserted into the PIF V6.0 portal. Companies will need to discuss this with their chosen portal vendor.

The supplier is the company completing and issuing the document. It is at the supplier's discretion if they choose to insert their logo. Inserting the company logo may be an aid to a customer in quickly and easily identifying the company that the PIF relates to.

### Issue Date

This date refers to the date of issue of this version of PIF V6.0 by the AFGC and NOT the date of issue of the completed PIF by the user.

### Statements

**IMPORTANT:** The AFGC intends the PIF as a guide only – it should not be relied upon as or used as a substitute for legal advice. Suppliers and customers are responsible for ensuring their own compliance with applicable obligations in the Food Standards Code, food legislation, other applicable laws (including the Australian Consumer Law) and the terms of their contractual arrangements.

## Document Control

#### Date Completed

The date when the form was completed by the relevant technical personnel on behalf of the company. This is system generated and can be edited.

#### PIF Document Status

This is to indicate to the PIF receiver if the content in the PIF is Final or Draft – users must nominate a status.

Users can save a PIF as a Draft for later completion. Users can send an incomplete PIF with the Status of Draft or Final. Users can change the Status to Final for an incomplete PIF.

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### **Company Document Number**

The supplier's document reference number. The number under which the supplier references this document.

### **Issue Date**

The suppliers document issue date. The date on which the completed PIF was issued or last updated by the supplier.

### **Issue Number**

The supplier's document issue number. The supplier's issue or revision number for the completed PIF.

### **Name Completed by**

The name of the person completing the PIF is required for the purpose of follow up within the business should queries arise. If there is more than one person in the business who is responsible for completing the PIF, then it is suggested that the name provided is that of the person who completed the majority of the PIF.

### **Title Completed by**

Position, role or job title of the person or role who completed the PIF is required for the purpose of follow up within the business should queries arise. If there is more than one person in the business who is responsible for completing the PIF, then it is suggested that the name provided is that of the person who completed the majority of the PIF.

### **Name Approved by**

Name of the person who approved the PIF on behalf of the Business is required for the purpose of follow up within the business should queries arise.

This may be the person/role who completed the PIF however it is suggested that the person who completes the PIF is not the approver.

### **Title Approved by**

Role or position title of the person or role who approved the PIF.

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## 1.0 Type of Product

When completing a PIF V6.0 a choice must be made from one of the types of PIF shown in Table 1. Each of these variations provide differing levels of detail.

Once a PIF type has been started it may be changed to another type. Specific instructions for this operation can be found in Vendor portal user information.

Table 1: Types of PIF

Type of PIF	Description
<b>Sample</b>	This version of the PIF contains the least information and is intended to be used to convey basic information about a product to a customer.
<b>Flavour</b>	This version has been created specifically for flavours.
<b>Ingredient</b>	This version is designed for ingredients
<b>Retail Ready</b>	This version contains the most information and is intended for products that are ready for sale to the end consumer.

## 1.1 Company Information

### 1.1 Company Information

Standard/Schedule Number	Standard Name/Guidance
<b>ANZ Food Standards Code - 1.2.2</b>	Information requirements – food identification
<b>ANZ Food Standards Code – 3.2.2</b>	Food Safety Practices and General Requirements

The company logo can be inserted into the PIF V6.0 portal. Companies will need to discuss this with their chosen portal vendor.

#### Contact Details

##### *Company Name*

The name of the company supplying this product to the customer.

If the business is operating as a sole trader, a partnership, or a trust, and not as a company, then the business name must be registered in the state or territory in which it operates. A business name is not required if business is conducted under a personal name (given name, surname), or spouse, or defacto's name (given name, surname).

Registration of a business name does not in itself give any proprietary rights - only a trademark can give that protection.

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### *Company Australian Business Number*

The Australian Business Number (ABN) is the 11-digit identifying number those businesses use when dealing with other businesses. For example, ABNs usually appear on invoices, and other sales related documents.

It is not compulsory for an Australian company to register for an ABN, but it may be required to register for the GST.

This is an optional field and is 'free text' to cater for companies who are not registered in Australia.

### *Trading Name*

A trading name is the name or title under which a person, or other legal entity, trades.

### Business Street Address

This information may be required as part of product labelling where the product is a packaged retail-ready finished product.

The full street address of the business is required - ensure the unit number (if appropriate), street number & name, city, state, country, and postcode (or zip code) is included.

### Business Postal Address

The full postal address details for postal mail delivery. This should be included only if it is different to the street address.

### Key Contact for Inquiries

The full name, position title and contact details (email, phone, and fax number) of the key contact person dealing with the product on behalf of the supplier. This person should have access to technical specifications, supply and availability, and other relevant information that may be required by customers.

With respect to the contact numbers to reach the key contact - use a mobile phone number if a landline number is not relevant.

For Australia, most **Australian** telephone numbers are 10 digits long, and are generally written *0A BBBB BBBB* or *04XX XXX XXX* for mobile telephone numbers, where *0A* is the optional "area code" (2,3,7,8) and *BBBB BBBB* is the subscriber number.

When the number is to be seen by an international audience, it is written *+61 A BBBB BBBB* or *+61 4XX XXX XXX*. When written for a local audience, the optional area code is omitted. The area code is often written within parentheses *(0A) BBBB BBBB*. Mobile numbers should never have parentheses.

Almost all **New Zealand** telephone numbers are seven digits long, with a single-digit access code and a single-digit area code for long-distance domestic calls. Traditionally, the number was given as *(0A) BBB-BBBB*, with the two first digits (the STD code) often omitted for local calls. The brackets and the dash are also often omitted. Mobile numbers follow the same format, but with the area code being two digits, i.e. *(02M) BBB-BBBB*. (Some mobile numbers are longer: *(021)02BBBBBB*, *(021)08BBBBBB*, *(020)40BBBBBB*, *(020) 41BBBBBB* and *(028) 25BBBBBB*; and some are shorter: *(021)3BBBBB*, *(021)4BBBBB*, *(021)5BBBBB*, *(021)6BBBBB*, *(021)7BBBBB*, *(021)8BBBBB* and *(021)9BBBBB*).

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For international use, the prefix +64 is substituted for the leading zero, giving +64-A-BBB-BBBB for landlines, and +64-MM-BBB-BBBB for mobile numbers.

Standard/Schedule Number	Standard Name/ Guidance
<b>ANZ Food Standards Code - 1.2.2</b>	Information requirements – food identification
<b>ANZ Food Standards Code – 3.2.2</b>	Food Safety Practices and General Requirements

## 1.2 Manufacturing Information

This section should be completed when the manufacturing site(s) are in different locations to the Company head office information provided in the Company Information section OR when the manufacturer is different to the supplier, i.e., the company manufacturing the product is different to the supplier as in the case of a third-party manufacturer (3PM).

If there are multiple sites where the product is manufactured, and the product supplied may be provided from these alternate sites, list the additional sites in order of priority or volume of production.

### *Relevant Facility Information Form (FIF) Unique ID*

This field has been included to accommodate the Facility Information Form (FIF) once this has been developed. The FIF will be available via online portals in the same way that PIF V6.0 is accessed via a vendor portal.

### *Company Name*

The name of the company supplying this product to the supplier.

### *Supplying Manufacturer*

The name of the company manufacturing this product if this is different to the name of the company supplying the product. This may be the case where a product is contract manufactured by a third-party manufacturer (3PM).

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## 2. Product Information

Standard/Schedule Number	Standard Name/ Guidance
<b>ANZ Food Standards Code [FSC] -1.1.2</b>	Definitions used throughout the Code
<b>FSC - 1.2.2</b>	Information requirements – food identification

### Product Information

#### *Product Name*

This is the name or description assigned and referenced by the supplier of this specific product.

In naming or describing the product, consideration should be given to the relevance and use of terms such as ‘type’ or ‘style’ in association with the name as to whether this has the potential to mislead consumers. Consideration must also be given to restrictions on terms which have received a certification trademark.

Geographical Indication (GI) is the legal term indicating that an item is from a specific region and thereby carries special attributes and is protected as a form of intellectual property which has specific relevance for trade with the European Union (EU), and with trading partner who trade in the EU. If the EU has a trade agreement with a country, the product name and product description may be required to consider GI naming restriction. For example: the EU has agreements with countries such as Colombia, Peru, and South Korea that would prohibit the sale of oranges, or orange juice, labelled as ‘Valencia Oranges’ that did not originate from Valencia in Spain.

However, for the most part, GI does not apply to products intended for sale in Australia, other than where such claims may be false or misleading.

#### *Product Code*

The supplier’s internal identification code used for assigning or referencing this specific product.

#### *Barcode – Product*

This information is optional for retail ready products – it is not required for other types of PIF V6.0.

A barcode is an optical, machine-readable, representation of data; the data usually describes something about the object that carries the barcode.

#### *Global Trade Item Number (GTIN)*

This information is optional for retail ready products – it is not required for other types of PIF V6.0.

GS1’s Global Trade Item Numbers (GTINs) can be used by a company to uniquely identify its trade items. GS1 defines trade items as products that are priced, ordered, or invoiced at any point in the supply chain. GTINs in the past have been referred to as the barcode number, the EAN or APN. They are used extensively in the food supply chain by retailers, manufacturers, growers and increasingly by ingredient suppliers.

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The use of standardized product identification (such as GTIN) ensures the accuracy of product information, at every level of packaging, throughout the end-to-end food supply chain. Reliable product data enables more effective product recalls, efficient traceability, and improved business processes.

Benefits of GTIN include:

- Accurate identification of products from point-of-origin to point-of-sale/consumption
- Enables the use of GS1 Data Capture standards (barcodes and RFID)
- Improves inventory management and reduces waste
- Facilitates more effective product recalls
- More efficient payment and reporting processes
- Improves order and invoice accuracy
- Improves staff utilization and productivity

For further information on GS1 Standards and how to assign GTINs to products contact GS1 Australia on 1300 BARCODE (1300 227 263).

#### *Product Description*

A technical description of the identity of the food. This may include a description of the physical nature, technological function, or characterising attributes of the product.

Examples:

- A natural chicken flavour consisting of natural extracts on a maltodextrin and salt base.
- Crunchy peanut butter produced from clean, shelled peanuts which are roasted to a uniform medium brown colour.
- An aqueous, clear solution of food grade acetic acid 75% w/w
- Ground cloves are the ground dried unopened flower bud from the plant *Eugenia Carophyllata*. A dark brown powder with strong aromatic flavour.

#### *Legal Description*

The legal description of the product. This can be used for ingredient labelling purposes in accordance with Standard 1.2.4 and Standards 1.3.1, 1.3.2 and 1.3.3 of the Code. Where one or more alternatives exist, include all alternatives including any generic names, class names and food additive names and/or numbers.

Examples:

- Colour (160a), Carotenes, Colour (Carotenes)
- Vegetable Gum (407), Carrageenan Gum, Vegetable Gum (Carrageenan),
- Acetic Acid, Food Acid (260), Acidity Regulator (260), Food Acid (Acetic Acid)

The product description and the legal description may differ to the extent that the legal description often contains less detail and reflects the name of the product used in labelling.

### *Suggested Labelling Description*

Suggested Labelling Description is defined as the prescribed name for the food if there is one, or else a name or description, sufficient to indicate to consumers the general nature of the food.

### *Process Description*

This is a short description of how the product is manufactured. This does not need to provide confidential, proprietary information but rather a summary on the process(es) used in the manufacture of the product.

For example: blending; roasting, drying.

*Are you selling this item to a health facility (e.g., hospital, aged care, mental health facility, nursing home)?*

This additional information is required if product is to be supplied to a health facility such as a hospital, aged care, mental health facility, nursing home. This triggers questions later in the PIF if the response is “yes” to this question.

## 2.1 Ingredient Declaration

Standard/Schedule Number	Standard Name/ Guidance
<b>ANZ Food Standards Code [FSC] - 1.2.2</b>	Information requirements – food identification
<b>FSC 1.2.4</b>	Information requirements – statement of ingredients
<b>FSC 1.2.10</b>	Information requirements – characterising ingredients and components of food
<b>FSC 1.3.1</b>	Food Additives
<b>FSC 1.3.2</b>	Vitamins and Minerals
<b>FSC 1.3.3</b>	Processing Aids
<b>FSC 1.4.1</b>	Contaminants & Natural Toxicants
<b>FSC 1.4.2</b>	Agvet Chemicals (Australia only) Maximum Residue Limits of Agricultural Compounds, Mandatory Food Standard 1999 (and subsequent amendments) issued under sections 11C and 11Z of the Food Act 1981 in New Zealand
<b>FSC 1.4.4</b>	Prohibited and Restricted Plants and Fungi
<b>Schedule 23</b>	Prohibited plants and fungi
<b>Schedule 24</b>	Restricted plants and fungi
<b>FSC 1.5.1</b>	Novel Foods
<b>Schedule 25</b>	Permitted novel foods
<b>FSC 1.5.2</b>	Food Produced using Gene Technology
<b>Schedule 26</b>	Food produced using gene technology
<b>FSC 1.5.3</b>	Irradiation of Food
	Various Imported Foods Requirements

### Code Compliance

The following statement is included in the PIF to cover off compliance with the Code and the Standards specifically listed.

*This product complies with the Australia New Zealand Food Standards Code; and in addition to the information provided specifically in this form, and without limitation to compliance with any other part of the Code, the product complies with the following Standards where applicable:*

Standard 1.4.1 – Contaminants and natural toxins

Standard 1.4.2 – Agvet chemicals (Australia only)

Standard 1.4.4 – Prohibited and restricted plants and fungi

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### Options to complete the Ingredient Declaration section of PIF V6.0

There are two options or approaches to choose from when completing PIF V6.0 – a full breakdown (Option 1) and a Summary (Option 2). Each of these options is explained further below.

It is up to the supplier and customer to negotiate an acceptable outcome if a concern arises regarding the level of detail of information provided.

#### Option 1: full breakdown

PIF V6.0 is structured in a different way to PIF v5. A full list of ingredients including food additives, processing aids, vitamins, and minerals for the product (sample, flavour, ingredient, or retail ready product) is required.

Further information is required for each entry. This section is the central element of PIF V6.0 and should be completed as fully as possible to leverage the full functionality and value of PIF V6.0.

The following table shows a simple example of this approach.

A full breakdown of components and their percentages is requested:

- to assist customers to compile their own product ingredient lists (which may require consolidation of similar components across different ingredients from different suppliers), and
- to provide a cross check to the allergen's sections and information on hidden ingredients.

Product	Compound Ingredient	Ingredient	Allergen ANZ	Allergen International	X Contact Allergen	Novel
<b>Muesli</b>	Cereal Mix	Wheat	Y	N	N	N
		Oats	Y	N	N	N
		Millet	N	N	Y	N
	Nut Mix	Almonds	Y	N	N	N
		Peanuts	Y	N	N	N
		Walnuts	Y	N	N	N
	Fruit Mix	Sultanas	N	N	N	N
		Apple	N	N	N	N
		Banana	N	N	N	N
		Sugar	N	N	N	N

*Option 2: summary*

Where it is acceptable to customers, users may instead specify a single ingredient as a rolled-up representation of some or all ingredients in the product. If only one ingredient is specified it should have the same name as the product name. Any summarised ingredient must include all allergen, GM, Novel Food, and quarantine information for any ingredients contained therein and not separately specified.

*Example: Single ingredient*

Product	Compound Ingredient	Ingredient	Allergen ANZ	Allergen International	X Contact Allergen	Novel
<b>Muesli</b>		Muesli	Y	N	Y	N

*Example: Partially summarised*

Product	Compound Ingredient	Ingredient	Allergen ANZ	Allergen International	X Contact Allergen	Novel
<b>Muesli</b>		Cereal Mix	Y	N	Y	N
		Nut Mix	Y	N	N	N
		Fruit Mix	N	N	N	N

For example:

The % to be filled in will depend on what they have entered the corresponding field – UID 2.1.0.23

For example – a product such as fruit and peanut muesli – where the peanut is a characterising ingredient:

If they have chosen to enter muesli, then it will be the % of peanut ingredient in the muesli which is most likely the finished product.

If they have chosen to enter nut mix, then it will be the % of peanut in the nut mix.

The information filled in is intended to relate to the Ingredient, Food Additive, Vitamin or Mineral, Processing Aid listed.

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The following table sets out each of the data items required for this section of the PIF.

Information	Response	Description/Comment
<b>Compound ingredient name</b>		<p>An ingredient of a food is a compound ingredient if it is itself made from two or more ingredients.</p> <p>This is only required for ingredients, not food additives, processing aids, vitamins or minerals.</p> <p>This column does not need to be completed if you fill out the PIF as shown in the examples in Options 1 &amp; 2.</p>
<b>Substance Type</b>	<ul style="list-style-type: none"> <li>• Ingredient</li> <li>• Food additive</li> <li>• Processing aid</li> <li>• Vitamin or mineral</li> </ul>	For each substance, you are required to specify its type. This is a dropdown list.
<b>% Breakdown</b>	<p>% of total – average OR</p> <p>% of total range – minimum</p> <p>% of total range - maximum</p>	
<b>Characterising component</b>	Y/N	<p>Is this a characterising component of the product?</p> <p>If the response is “yes” then you will be required to provide information about the amount of the component as a percentage.</p>
<b>Allergens (ANZ)</b>	Y/N	<p>Is this substance an allergen or does it contain any allergens required to be declared in ANZ?</p> <p>If the response is “yes” then you will be required to provide further information in another section of the PIF.</p> <p>The allergen(s) with a “yes” response will be copied to section 3.2.</p>
<b>Allergens (International)</b>	Y/N	<p>Is this substance an allergen or does it contain any allergens required to be declared internationally?</p> <p>If the response is “yes” then you will be required to provide further information in another section of the PIF.</p> <p>The allergen(s) with a “yes” response will be copied to section 3.2.</p>



Information	Response	Description/Comment
<b>Potential for cross contact allergens to be present</b>	Y/N	<p>Is there potential for allergens to be present in this substance due to cross contact?</p> <p>If the response is “yes” then you will be required to provide further information in another section of the PIF.</p> <p>The allergen(s) with a “yes” response will be copied to section 3.2.</p>
<b>Food Standards Code Additive Number or EC (as applicable/available)</b>	Additive number & name	<p>Provide the additive number for this additive – this will be required if you have identified the substance as a food additive or processing aid.</p> <p>Note: not all additives have been assigned a number or EC.</p> <p>This is a text field, so you can also include the additive name with the number or just the name if the additive does not have a number assigned.</p>
<b>Permitted class name</b>	Class name	Provide the class name for this additive – this will be required if you have identified the substance as a food additive or processing aid.
<b>Novel food</b>	Y/N	<p>Is this substance a novel food according to Standard 1.5.1?</p> <p>If the response is “yes” then you will be required to provide further information in another section of the PIF.</p> <p>The substances with a “yes” response will be copied to section 4.1.</p>
<b>Nutritive substance</b>	Y/N	Is this substance used as a nutritive substance?
<b>Genetically Modified (GM) Food</b>	Y/N	<p>Is this ingredient or component a food produced using gene technology according to Standard 1.5.2?</p> <p>If the response is “yes” then you will be required to provide further information in another section of the PIF.</p> <p>The substances with a “yes” response will be copied to section 4.2.</p>
<b>Potential for GM cross contact</b>	Y/N	<p>Is there potential for cross contamination of the substance with GM materials?</p> <p>If the response is “yes” then you will be required to provide further information in another section of the PIF.</p>

Information	Response	Description/Comment
		The substances with a “yes” response will be copied to section 4.2.
<b>If not GM - specify reason</b>	Options: <ul style="list-style-type: none"> <li>No approved GM varieties available</li> <li>Non-GM variety used</li> <li>Identity preservation program in place</li> <li>Analytical testing confirms absence</li> <li>Verifiable documentation of status</li> <li>Other</li> </ul>	If the substance is non-GM, you are required to specify the reason why from a dropdown list.
<b>Is a quarantine treatment applied?</b>	Y/N	If the response is “yes” then you will be required to provide further information in another section of the PIF.  The substances with a “yes” response will be copied to section 4.3.
<b>Is this the product of Nanotechnology</b>	Y/N	

#### *Characterising component (%)*

Record the percentage of any characterising component present ingredient in the product. If any of the components of compound ingredients are classed as characterising, their exact percentage should be provided in the last column. If <5% individual components do not need to be listed.

Allergens and additives will need to be identified by responding “Yes” in the appropriate column.

For single ingredients, this percentage will be the same as the percentage listed in the previous percentage column.

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## 2.2 Country of Origin

Standard/Schedule Number	Standard Name/ Guidance
<b>Competition and Consumer Act 2010</b>	Country of Origin Food Labelling Information Standard 2016
<b>Guidance (ACCC)</b>	Country of Origin food labelling – a guide for business (ACCC) [as of March 2021]

### *Is the Product to be sold in Australia?*

This question is for companies who intend to sell the product in countries other than Australia, e.g., New Zealand

If the response to this question is “N” then the entire Country of Origin section is optional.

### *Country of Origin*

If the ingredient may be sourced from more than one country, EITHER state 'VS' for Various in the "Country of Origin" column OR add additional columns, specifying one country per column to a maximum of 10 Countries of Origin.

### *UN/LOCODE Convention*

The [UN/LOCODE](#) convention is used to enter the country of origin, whose name is then displayed.

### *Average Australian Content (%)*

The *Country of Origin Food Labelling Information Standard 2017*<sup>1</sup> states:

*“a reference to the average proportion by weight of the Australian ingredients of a packaged food is a reference to the average determined over a continuous 1, 2- or 3-year period that ends no later than 2 years before the date the labelling is affixed to the package.”*

In the CoOL table the columns – the values for “Percent of Total (average)” and “Percent of Total (minimum)” columns are copied from Table 2.1 for each ingredient.

The values that are entered into table 2.1 for each ingredient are the percentage of that ingredient in the product NOT the percentage of Australian content. When these values are copied across to the CoOL table, they represent the total amount of the ingredient.

The last 2 columns labelled “Minimum Australian content” and “Average Australian Content” are then where the user can enter the % Australian content.

### *What is the total minimum percentage (%) of Australian ingredients in this product?*

This requires the minimum % Australian content of the (compound) ingredient or component to be provided.

<sup>1</sup> <https://www.legislation.gov.au/Details/F2017C00920>, accessed 30.07.2022

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In providing this information consideration should be given as to whether there is a risk that the % of Australian ingredients are not available due to seasonality or potential for natural disasters (contingency) for example.

**Note:** to satisfy the requirements of the *Country of Origin Food Labelling Information Standard 2017* this is all that is required – a breakdown by individual ingredients is **not** required to comply with the requirements of the Information Standard.

### 3. Composition Information

Standard/Schedule Number	Standard Name/ Guidance
<b>ANZ Food Standards Code - 1.2.3</b>	Information Requirements – warning statements, advisory statements and declarations
<b>Schedule 9</b>	Mandatory advisory statements
<b>Guidance (AFGC)</b>	Food Industry Guide to Allergen Management and Labelling (AFGC)
<b>Guidance (Allergen Bureau)</b>	Food Industry Guide to the Voluntary Incidental Trace Allergen Labelling (VITAL®) Program V2.0 VITAL® Best Practice Labelling Guide for Australia and New Zealand

#### 3.1 Advisory and Warning Statements

The presence of certain foods or substances in foods triggers either an advisory or mandatory warning statement to be placed on the label of the food.

The customer will need to know this information to ensure labelling compliance of their products with the requirements of this section of the Code.

To assist in filling out this section, the following information is provided for some of the components.

**NOTE: For a full list consult Standard 1.2.3 and Schedule 9 of the Code**

##### Bee Pollen

The pollen collected from the legs of bees. This does not include bee pollen that is naturally present in honey.

##### Propolis

The reddish resinous cement collected by bees from the buds of trees, which is used to stop up crevices in hives and strengthen the cells.

##### Royal Jelly

A milky white viscous secretion from the salivary glands of honeybees.

##### Aspartame

An intense sweetener that replaces the sweetness normally provided by sugars in foods without contributing significantly to the available energy.

##### Quinine

An alkaloid derived principally from the bark of the cinchona tree.

##### Guarana

Derived from a vine (*Paullina cupana H.B.K.*), it consists of a crystallisable principle, called guaranine, which is identical to caffeine.

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### Polyols, Isomalts and Polydextrose

Modified carbohydrates including lactitol, maltitol, maltitol syrup, mannitol, xylitol, erythritol, isomalt, polydextrose and sorbitol. Special consideration should be given where these substances may be used as a carrier in foods. Their presence at particular levels triggers an additional advisory statement to the effect that excess consumption may have a laxative effect to be included on the label of the food.

### Added Caffeine

Caffeine is a natural substance found in more than 60 plant species and their products such as tea leaves, coffee beans, guarana, and cocoa seeds. Caffeine can also be produced synthetically and added to certain foods, beverages, and medications.

Caffeine is one of a group of compounds called methylxanthines some of which are used therapeutically.

Caffeine occurs naturally in foods, such as coffee, tea and cocoa and has a long history of safe use as a mild stimulant. Products are also available with added caffeine, including cola-type soft drinks, formulated caffeinated beverages (energy drinks) and energy shots.

The Food Standards Code restricts how much caffeine can be added to cola-type soft drinks and energy drinks. Foods containing added caffeine must also have a statement on the label that the product contains caffeine.<sup>2</sup>

## 3.2 Allergens

### 3.2.1 Mandatory Declarations of Certain Foods to be declared as Allergens

The Code requires the presence of specified foods that may cause adverse allergic reactions to be declared on food labels. These substances are commonly referred to as allergens.

THIS SECTION HAS BEEN UPDATED TO REFLECT THE CHANGES REQUIRED BY PLAIN ENGLISH ALLERGEN LABELLING (PEAL)

On 25 February 2021 the Code was amended to introduce new requirements for the labelling of allergens in food.

These requirements include that allergen information is to be declared:

- in a specific format and location on food labels, and
- using simple, plain English terms in bold font

Businesses have 3 years from 25 February 2021 to implement the new requirements. During this transition period, food businesses can comply with either the existing allergen declaration requirements in the Code, or the new requirements.

A 2-year stock-in-trade period will follow the transition period. Any food packaged and labelled with existing allergen declarations before the end of the transition period may be sold for up to 2 years after the end of the transition period.

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<sup>2</sup> <http://www.foodstandards.gov.au/consumer/generalissues/Pages/Caffeine.aspx>, accessed 25/08/18

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The list of foods that may cause severe adverse reactions and must always be declared on food labels is contained in Schedule 9 of the Code.

PIF V6.0 provides a dropdown list for allergens required to be labelled under Australia New Zealand regulations as shown in Table 1.

PIF V6.0 covers off the labelling exemptions for certain products or products of those foods as set out in Table 1.

Ingredients should be reviewed for hidden sources of allergens. Ingredients may contain less- known sources of allergens which may be overlooked.

The Allergen Bureau publication [Unexpected Allergens in Food](#) provides information to assist in the identification of hidden or unexpected allergens.

Table 2: Mandatory Declaration of Allergens<sup>3</sup>

<i>Item</i>	<i>Column 1</i>	<i>Column 2</i>	<i>Column 3</i>	<i>Column 4</i>
	<i>Food</i>	<i>Exemption</i>	<i>Required name for declarations in a statement of ingredients</i>	<i>Required name for other declarations</i>
1	added sulphites in concentrations of 10 mg/kg or more		sulphites	sulphites
2	Any of the following cereals (including hybridised strains thereof) if they contain *gluten:	the cereal or its hybridised strain that is present in beer or spirits		
	barley		barley	gluten
	oats		oats	gluten
	rye		rye	gluten
3	wheat (including its hybridised strain) irrespective of whether it contains gluten	(a) the wheat or its hybridised strain that is present in beer or spirits; (b) glucose syrups made from wheat starch and that: (i) have been subject to a refining process that has removed gluten protein content to the lowest level	wheat	(a) wheat; and (b) if gluten is present - gluten.

<sup>3</sup> Source: Schedule 9, ANZ Food Standards Code, accessed 30.07.2022

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<b>Item</b>	<b>Column 1</b>	<b>Column 2</b>	<b>Column 3</b>	<b>Column 4</b>
	<i>Food</i>	<i>Exemption</i>	<i>Required name for declarations in a statement of ingredients</i>	<i>Required name for other declarations</i>
		that is reasonably achievable; and (ii) have a gluten protein content that does not exceed 20 mg/kg; (c) alcohol distilled from wheat.		
4	Any of the following tree nuts:			
	almond		almond	almond
	Brazil nut		Brazil nut	Brazil nut
	cashew		cashew	cashew
	hazelnut		hazelnut	hazelnut
	macadamia		macadamia	macadamia
	pecan		pecan	pecan
	pine nut		pine nut	pine nut
	pistachio		pistachio	pistachio
	walnut		walnut	walnut
5	crustacea		crustacean	crustacean
6	egg		egg	egg
7	fish	isinglass derived from fish swim bladders and used as a clarifying agent in beer or wine	fish	fish
8	lupin		lupin	lupin
9	milk	alcohol distilled from whey	milk	milk
10	mollusc		mollusc	mollusc
11	peanut		peanut	peanut
12	sesame seed		sesame	sesame
13	soybean	(a) soybean oil that has been degummed, neutralised, bleached and deodorised;	soy, soya, or soybean	soy



<i>Item</i>	<i>Column 1</i>	<i>Column 2</i>	<i>Column 3</i>	<i>Column 4</i>
	<i>Food</i>	<i>Exemption</i>	<i>Required name for declarations in a statement of ingredients</i>	<i>Required name for other declarations</i>
		(b) soybean derivatives that are tocopherol or phytosterol.		

### *International Allergens*

PIF V6.0 provides a dropdown list for allergens required to be labelled under regulations in other countries/jurisdictions as follows:

- **Buckwheat** and buckwheat products
- **Celery** and celery products
- **Mustard** and mustard products
- **Coconut** and coconut products

Further information on international allergens can be found on the Food Allergy Research and Resource Program ([FARRP website](#)<sup>4</sup>).

### *Further Allergen Information*

#### Allergen source name

The source name is the name of the allergenic substance/food from which the ingredient, additive or processing aid is derived – the name of the food as set out in Table 1.

The source name IS NOT the name of the food in which the allergen is found. For example, soy sauce is NOT the source name for the presence of soybean products, but rather it is soybean.

#### Allergen derivative name

The name of the substance which has been derived from the source material and is used in the product. This may be an ingredient, a compound ingredient, an additive, or a processing aid. For example, maltodextrin may be derived from wheat, casein is a derivative from milk.

Has processing rendered this gluten free - no detectable gluten?

Has the ALL of the allergenic protein been removed during the process of manufacturing the derivative material? For example, if during the process of manufacture, all allergenic protein derived from wheat, oats, barley, and rye is removed then answer "Yes".

<sup>4</sup> Accessed 30.07.2022

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Is there an exemption in the ANZ Food Standards Code Schedule 9 for this wheat-based material?

Note: this question has changed – was previously: Has processing rendered this free of wheat proteins?

Has ALL the allergenic protein been removed during the process of manufacturing the derivative material? For example, if during the process of distilling wheat grain alcohol this removes all wheat derived allergenic protein, then answer "Yes".

FSANZ expectation for gluten removal or protein removal is that you need to apply for an exemption to the code.

Proportion (%) of Derivative in Product

How much of the allergenic derivative is in the substance – declared as a percentage.

Proportion (%) of Protein in derivative

How much protein is in the allergenic derivative – declared as a percentage.

Is there an exemption in the ANZ Food Standards Code Schedule 9 for this material?

Note: this question has changed Process - Is allergenic protein removed?

Has ALL the allergenic protein been removed during the process of manufacturing of the derivative material? For example, if during the process of manufacture, all allergenic protein derived from the allergenic material is removed then answer "Yes".

### *Sulphites*

Sulphites have a long history of use in foods. They naturally occur in some foods but are widely used as an additive to prevent microbial spoilage and preserve colour. Cordials, dried fruit, sausages, and wine are some of the foods that commonly contain sulphites.<sup>5</sup>

Sulphites can cause allergy like reactions (intolerances), most commonly asthma symptoms in those with underlying asthma, sometimes allergic rhinitis (hay fever) like reactions, occasionally urticaria (hives) and very rarely, anaphylaxis (severe allergic reactions). Wheezing is the most common reaction.

Under the Food Standards Code added sulphites must be declared in the ingredients list in the same way that any food additive is required to be declared in accordance with the requirements of Standard 1.2.4-7) of the Code. If, however the food additive regulation does not require the declaration of sulphites such as:

- present as a processing aid (Standard 1.2.4-3(2)),
- compound ingredient at less than 5% (Standard 1.2.4-5(6)), or
- as carry over,

then the requirement is for declaration of added sulphites when present in foods in concentrations of 10 mg/kg or more. This allows consumers who may be sensitive to sulphites to avoid them.

<sup>5</sup> Source: FSANZ, <http://www.foodstandards.gov.au/consumer/additives/sulphite/Pages/default.aspx>. Accessed 30.07.2022

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When a manufacturer meets this requirement by declaring sulphites in an ingredient list, the sulphites must be labelled by their prescribed class name (e.g. preservative), followed by the additive's specific name (e.g. sulphur dioxide) or code number (e.g. 220 to 228).

Care must therefore be taken in the method used for testing as some test methods, such as the use of test strips have a lower limit of quantification of 10mg/kg. This is not sufficiently accurate to ensure the reliability to results as it is important that the method used have a lower limit of sensitivity well below 10 mg/kg so that there is quantification of sulphite in the range of 1 – 10 mg/kg.

#### Sulphites - naturally occurring in ingredients

This is the level of sulphites present as a natural constituent of the food ingredient or produced as a by-product of processing.

**Naturally occurring sulphites are not required to be declared as an allergen. This information is requested in the PIF for completeness.**

#### Sulphites - residual from processing aid, or carry-over in compound in ingredient

This is the level of sulphites added to the food via compound ingredients and/or the residual sulphite present from the use of a processing aid, and which is not naturally occurring in the ingredients, nor is it sulphite added as a preservative.

#### Sulphite added as an ingredient

This is the level of added sulphites only. It excludes any naturally occurring sulphites, or added to the food via ingredients, food additives and/or processing aids as a compound ingredient.

Added sulphur dioxide or sulphites are widely used as preservatives. Special consideration should be given to the treatment of processed fruits, vegetables, and herbs.

Examples of common sulphite-containing preservatives are sulphur dioxide (220), potassium bisulphite (228), potassium metabisulphite (224), sodium sulphite (221), sodium metabisulphite (222), and sulphurous acid.

The source of the added sulphites (including additive numbers where relevant) should be included in the PIF V6.) in the box provided.

#### Total Sulphite

This value is automatically calculated based on numerical values. Where the value is stated as 'less than' a value, this should be relevant to the limit of detection for the method used, for example 'less than 10' in each of the three fields will result in a total sulphite value of 'less than 10'.

Total sulphites present in product is important as it is a mandatory requirement to declare the presence of sulphite when present at 10mg/kg or more.

#### *Allergen Substrate or feedstock*

Where the PIF is for a raw material, the allergen declaration exempts allergenic substrates/feedstock that has been used in a metabolic process to produce the ingredient where the allergenic proteins have been fully removed or metabolised. For example, the use of soybean to produce xanthan gum.

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If the allergenic proteins have NOT been fully removed or metabolised, allergen labelling of substrate/feedstock in association with this product is required.

### 3.2.2 Cross contact Allergens

This section of the PIF is intended to collect information to enable a risk assessment to be completed for the presence of cross contact allergens from the substances in the product itself, from the supply chain and manufacturing environment.

Cross contact allergens are those allergens that may be inadvertently incorporated into a product through various routes and where the occurrence of the allergen is sporadic, intermittent, and uncontrollable.

Where an allergen is consistently present (i.e., not sporadic) but the occurrence is unintended, highly variable, and uncontrollable, it may also be a cross contact allergen and reported in Section 3.2.2 of the PIF.

NOTE: cross contact allergens are not to include the potential risks of production errors or other known failures to adhere to good manufacturing practices.

The declaration provided in the PIF is intended to cover all possible routes and sources of the cross-contact allergen, such as inclusion from growing environments, harvesting, transport and storage of the raw materials through to considering the cross-contact sources in a manufacturing facility, such as through the use of shared equipment or from aerosols or dust in a processing environment.

This section requests information on cross contact allergens that the supplier has assessed as likely to occur and the level of allergen that may be present, or whether the cross-contact allergen occurs as a particulate material. This will enable customers to assess whether a precautionary allergen labelling (PAL) statement is required on their product.

If an assessment of the 'worst case' or maximum level protein from the cross-contact allergen is provided using the VITAL™ method, the manufacturer or supplier can determine that a precautionary statement is not required if the level is present is within Action Level 1 of the VITAL method.

The Allergen Bureau provides comprehensive information on its [website](#).

The following information is requested on the PIF in relation to cross contact allergens.

#### Form

The form of the allergen is required to be specified as either a particulate or readily dispersible.

#### **Particulate:**

- VITAL defines particulate as a separate and distinct particle of material (e.g., sesame seeds, slithered nuts, grated cheese).
- Does not mix homogeneously with other parts of the food; or
- May consist of, or are likely to aggregate, into an entity which contains equal to or greater than the relevant [allergen] Reference Dose

If particulates are present, then a VITAL calculation is not appropriate.

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### Readily dispersible:

VITAL defines readily dispersible as a powder or liquid in homogenous form that is of a uniform size and easily distributed throughout a food product e.g., milk powder, soy flour. A readily dispersible cross contact allergen which is considered homogeneously distributed in the final product.

Readily dispersible materials are more likely to be homogeneously distributed through a product.

Is the allergen present in the same facility?

A facility refers to enclosed vicinity in which a product is manufactured. Separate, fully enclosed areas within the one site may be considered separate facilities. It is possible to have the allergen on a site, but still answer NO to allergen present in same facility if the allergen is strictly controlled and prevented from entering the designated area of the facility.

Is the allergen present on the same line?

Enter Yes or No based on whether the allergenic substance is present in other products that share common equipment (including batching, mixing, filling, and packing equipment), irrespective of the scheduling for production or whether this equipment is stripped and cleaned between use. This specifically refers to the equipment used within the facility.

Is there likely to be the risk of cross contact from other sources - growing, harvesting, transport, storage?

This question is requesting information in relation to the potential for the presence of cross contact allergens from other areas along the supply chain associated with the substance for which the PIF V6.0 is being completed.

What procedures are in place to prevent cross contact where allergens are used in the same facility or present on the same line?

This question seeks a description of the processes used by business to manage the risk posed by cross contact allergens. This information can reassure customers that appropriate risk management strategies are in place.

Have you conducted, or do you wish to conduct a VITAL® risk assessment for cross contact allergens?

A VITAL risk assessment is best practice for assessment of the risk posed by the potential for cross contact allergens to enter the supply chain for the product. Businesses are encouraged to adopt this best practice risk assessment tool when considering the potential risk posed by cross contact allergens.

If yes, provide the VITAL risk assessment outcome:

- No precautionary statement required
- “May be present” statement is required
- Not completed

If a precautionary statement is required, please provide the precautionary allergen statement. For example: May be present: milk and egg.

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If No (you do not wish to conduct a VITAL risk assessment), is a precautionary allergen statement appropriate for this product?

### 3.3 Additional Information Requirements

Standard/Schedule Number	Standard Name/ Guidance
<b>ANZ Food Standards Code - 1.3.1</b>	Food Additives
<b>FSC - 2.4.1</b>	Edible oils
	Australian Consumer Law – Competition and Consumer Act 2010 Specifically – Chapter 2 – Section 18
<b>FSC – 2.7.1</b>	Labelling of alcoholic beverages and food containing alcohol

The information collected in this section of the PIF is not specifically required for labelling under the Code. However, if a business or its customers wish to make statements or claims in relation to certain ingredients or substances which may or may not be present in the product, the information in this section will need to be provided to ensure false or misleading statements are not made.

The information is provided to:

- ensure that additional labelling needs are met, and
- allow responses to consumer enquiries related to ingredients or components about which further information is sought.

#### *Palm Oil*

Palm oil is a vegetable fat obtained from the fruit of the African oil palm tree. Palm oil contains a high proportion of saturated fat. This is unusual as most vegetable fats do not contain high proportions of saturated fats; however, there are exceptions such as palm oil and coconut oil.

There have been calls for palm oil to be identified in the ingredient list due to health as well as environmental concerns. Under current regulations palm oil can be labelled in the ingredient list using the generic terms 'vegetable oil' or by identifying the source of the oil, for example, as 'palm oil'.

For this reason, information is requested on palm oil in the PIF V6.0 for companies to identify its presence and label accordingly if they wish to do so.

The following information is requested in the PIF V6.0:

- Does this material contain Palm Oil or Derivatives of Palm Oil?
  - If yes, what is the classification of the type of palm oil and palm oil products?
  - If yes, what is the percentage of palm oil in the raw material?
- Is it RSPO certified?

[RSPO](#) is the Roundtable on Sustainable Palm Oil.

RSPO certification is an assurance to the customer that the standard of palm oil production is sustainable. All organisations in the supply chain that use RSPO certified sustainable oil products are audited to prevent overselling and mixing palm oil with conventional (or non-sustainable) oil palm products.

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- If certified, what is the Roundtable on Sustainable Palm Oil (RSPO) certification status:

- Mass balance (MB)

The **mass balance** supply chain model administratively monitors the trade of RSPO certified **palm oil** and its derivatives throughout the entire supply chain, as a driver for mainstream trade in sustainable **palm oil**.

- Fully Segregated (SG)

Sustainable palm oil from different certified sources is kept separate from ordinary palm oil throughout supply chain.

- Book and Claim (B&C)

**Book and Claim** supply chain model provide tradable certificates for RSPO certified **palm oil** to the **palm oil** supply base

- Identity preserved (IP)

Sustainable palm oil from a single identifiable certified source is kept separately from ordinary palm oil throughout the supply chain.

Further information on these different supply chain options for palm oil is available on the [RSPO website](#).

- Certificate number

If the palm oil in the product is certified, the certificate number as evidence of certification should be provided.

The certificate can be included as an attachment to the PIF.

- Has fatty acid composition been altered?

This question is seeking information on the fatty acid composition of the palm oil.

- If yes, specify the process used to alter the composition

This question is seeking information on the process used to alter the composition of the palm oil.

### *Gelatine*

Beef gelatine will naturally disqualify a product from making a vegan/vegetarian claim, and care must be exercised as to whether it would be suitable for kosher/halal foods. Beef gelatine is also an issue for imported products due to rules on potential BSE risk. Gelatine can be sourced from other materials, such as fish (still not acceptable for vegan/vegetarian) or the use of substitutes such as agar or carrageen. Gelatine will therefore automatically disqualify a product from all vegan claims, but not halal or kosher certification requirements.

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### *Beef – Collagen*

Beef collagen will disqualify vegan/vegetarian and maybe suitable for halal and kosher used.

### *Antioxidants*

**Antioxidants** retard or prevent the oxidative deterioration of foods. For example, in fats and oils, rancid flavours can develop when they are exposed to oxygen. Antioxidants prevent this from happening.

The PIF specifically requests information on the presence of the following antioxidants:

- **Butylated hydroxyanisole (BHA)**, additive number 320 is primarily used as an antioxidant and preservative in food.
- **Butylated hydroxytoluene (BHT)**, additive number 321 is primarily used as an antioxidant and preservative in food.

There is also provision for other antioxidants to be listed as appropriate.

### *Alcohol (Residual) and ethanol*

Standard 2.7.1 – Labelling of alcoholic beverages and food containing alcohol requires a statement of alcohol content for:

- (a) a food (including an alcoholic beverage) that contains more than 1.15% alcohol by volume; or
- (b) an alcoholic beverage that contains 1.15% or less alcohol by volume; or
- (c) a beverage that contains not less than 0.5% but not more than 1.15% alcohol by volume.<sup>6</sup>

If the product contains alcohol this information is required for customers to correctly label their products.

### *Added Fats and Oils – Animal or Vegetable*

#### Types of fats and oils

The types of added fats and oils are separated into animal and vegetable origin. Fats and oils of animal origin will invalidate vegan and vegetarian claims.

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<sup>6</sup> Refer to Standard 2.7.1 for the full requirements

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The PIF provides dropdown lists for each of animal and vegetable oils as follows:

Animal fats & oils	Vegetable fats & oils
Beef tallow – rendered beef	Sunflower oil
Sheep	Canola/Rapeseed oil
Pork lard	Corn/Maize oil
Poultry fat – chicken, duck, goose	Cottonseed oil
Cow – dairy	Peanut oil
Ghee – rendered butter	Safflower oil
	Sesame oil
	Soybean oil
	Olive oil
	Linseed
	Cocoa butter
	Other

Has fatty acid composition been altered?

The PIF V6.0 further requests information as to whether the fatty acid composition of the added fat or oil has been altered and the method used.

#### *Hydrolysed vegetable proteins*

Hydrolysed Vegetable Protein (HVP) is made by chemically degrading vegetable proteins (commonly from soy, maize, or wheat sources) into smaller compounds and in the case of full hydrolysis to amino acids. The type of protein and the degree and method of hydrolysis should be specified to assist with allergen inquiries.

#### *Added Colours*

Colours add, enhance, or restore colour to food. The additive number and type of colour should be specified to assist with product claims. Colours are broadly divided into three groups: natural, artificial, and not defined.

Type of colour:

- Natural
- Artificial
- Not defined

Use the 'not defined' category if the ingredient is highly coloured and added to a food for the purpose of providing colour and is a permitted food ingredient.

Not defined can be used where the colour manufacturer does not wish to categorise the colour as natural or artificial.

For each colour declared, an additive number or name should be assigned.

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### *Added Flavours*

Flavourings are substances used to impart taste and/or smell to food. Flavourings have a long history of safe use in a wide variety of foods, from confectionery and soft drinks to cereals, cakes, and yoghurts. They are used in comparatively small amounts so that consumer exposure is relatively low.

In the context of the PIF V6.0, “added flavour” excludes herbs, spices, and intense sweeteners.

The PIF V6.0 requests the type of flavour as follows:

- Natural
- Other flavouring
- Flavour enhancer

Natural flavour

The following definitions are taken from the current Codex Guidelines on the Use of Flavourings ([CXG 66-2008](#)).

#### Natural flavouring substances (CAC/GL CXG 66-2008 item 2.2.1.1)

Flavouring substances obtained by physical processes that may result in unavoidable but unintentional changes in the chemical structure of the components of the flavouring (e.g., distillation and solvent extraction), or by enzymatic or microbiological processes, from material of plant or animal origin. Such material may be unprocessed or processed for human consumption by traditional food-preparation processes (e.g., drying, torrefaction (roasting) and fermentation). This means substances that have been identified / detected in a natural material of animal or vegetable origin.

#### Natural flavouring complexes (CAC/GL CXG 66-2008 item 2.2.2)

Preparations that contain flavouring substances obtained by physical processes that may result in unavoidable but unintentional changes in the chemical structure of the flavouring (e.g., distillation and solvent extraction), or by enzymatic or microbiological processes, from material of plant or animal origin. Such material may be unprocessed or processed for human consumption by traditional food-preparation processes (e.g., drying, torrefaction (roasting) and fermentation). Natural flavouring complexes include the essential oil, essence, or extractive, protein hydrolysate, distillate, or any product of roasting, heating, or enzymolysis.

Other flavours

#### Synthetic flavouring substances (CAC/GL CXG 66-2008 item 2.2.1.2)

Flavouring substances formed by chemical synthesis.

#### Smoke flavourings (CAC/GL CXG 66-2008 item 2.2.3)

Complex mixtures of components of smoke obtained by subjecting untreated wood to pyrolysis in a limited and controlled amount of air, dry distillation, or superheated steam, then subjecting the wood smoke to an aqueous extraction system or to distillation, condensation, and separation for collection of the aqueous phase. The major flavouring principles of smoke flavourings are carboxylic acids, compounds with carbonyl groups and phenolic compounds.

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## Flavour enhancer

Substances added to enhance the existing taste and/or odour of a food, such as monosodium glutamate (621) and others usually in the additive number range of 620 – 641. Note that some food additives can have multiple functions and therefore it is important to review the additives within and outside this range for their function in the food.

There is also a requirement to specify if the product contains diacetyl as a flavour - this relates to all flavour categories.

### *Added Salt*

Any salt (sodium chloride) added to the product. This does not include salt that is naturally present in ingredients or in a product, EXCEPT if the product is salt in which case answer Yes.

### *Added Sugar*

Caution must be exercised here due to the different definitions of “sugar” and “sugars” in the Code. The definition of “sugars” is relevant for claims about “no added sugar”.

Standard 1.1.2 – Definitions used throughout the Code defines “sugar” as:

**sugar** means, unless otherwise expressly stated, any of the following:

- (a) white sugar;
- (b) caster sugar;
- (c) icing sugar;
- (d) loaf sugar;
- (e) coffee sugar;
- (f) raw sugar.

“Sugars” on the other hand is defined as follows:

- (a) in Standard 1.2.7, Standard 1.2.8 and Schedule 4 (except where it appears with an asterisk as ‘sugars\*’)—means monosaccharides and disaccharides; and
- (b) otherwise—means any of the following products, derived from any source:
  - (i) hexose monosaccharides and disaccharides, including dextrose, fructose, sucrose and lactose;
  - (ii) starch hydrolysate;
  - (iii) glucose syrups, maltodextrin and similar products;
  - (iv) products derived at a sugar refinery, including brown sugar and molasses;
  - (v) icing sugar;
  - (vi) invert sugar;
  - (vii) fruit sugar syrup;but does not include:
  - (i) malt or malt extracts; or
  - (ii) sorbitol, mannitol, glycerol, xylitol, polydextrose, isomalt, maltitol, maltitol syrup, erythritol or lactitol.

There is further information on the [FSANZ website](#) which may be of use.

Standard/Schedule Number	Standard Name/ Guidance
<b>ANZ Food Standards Code - 1.5.1</b>	Novel Foods
<b>FSC - Schedule 25</b>	Permitted novel foods

## 4. Pre-Market Clearance

### 4.1 Novel Foods

Novel foods are non-traditional foods that require assessment by FSANZ to establish their safety before they are used in the food supply in Australia and New Zealand.

In Australia and New Zealand, novel foods and novel food ingredients are regulated under Standard 1.5.1 – Novel Foods of the Code.

A novel food cannot be sold as food or used as a food ingredient unless it is listed in Schedule 25 and used in accordance with the conditions of use.

A non-traditional food means:

- a food that does not have a history of human consumption in Australia or New Zealand; or
- a substance derived from a food, where that substance does not have a history of human consumption in Australia or New Zealand other than as a component of that food; or
- any other substance, where that substance, or the source from which it is derived, does not have a history of human consumption as a food in Australia or New Zealand.

The [Advisory Committee on Novel Foods](#) (ACNF) considers whether particular foods meet the definition of ‘non-traditional food’ in the Standard and, if so, whether a safety assessment needs to be done. It uses a [guidance tool](#) to assist it in reaching its view on whether a food is novel or not.

The ACNF is chaired by FSANZ and made up of representatives from Australian state and territory jurisdictions and the New Zealand Ministry for Primary Industries.

The PIF requests the following information in relation to a novel food:

- Permitted Novel Food – listed in Schedule 25
- Conditions of use – if any listed in Schedule 25
- Assessment of the ingredient or component as novel – if the substance has been assessed as novel what was the outcome? This assessment could have been done by the ACNF or as independent legal advice.

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## 4.2 Food Produced using Gene Technology

Standard/Schedule Number	Standard Name/ Guidance
<b>ANZ Food Standards Code - 1.5.2</b>	Food Produced Using Gene Technology
<b>FSC – 1.3.1</b>	Food Additives
<b>FSC – 1.3.3</b>	Processing aids
<b>Schedule 26</b>	Food produced using gene technology
<b>Schedule 16</b>	Types of substances that may be used as food additives
<b>Schedule 18</b>	Processing aids

Foods produced using gene technology (GM foods) and ingredients (including food additives and processing aids) that contain novel DNA or novel protein must be labelled with the words 'genetically modified'.

**Novel DNA** and **novel protein** mean DNA or protein which, as a result of the use of gene technology, is different in chemical sequence or structure from DNA or protein present in the counterpart food that has not been produced using gene technology, other than protein that:

- is used as a processing aid or used as food additive; and
- has an amino acid sequence that is found in nature?

The PIF V6.0 requests the following information in relation to a food produced using gene technology:

- Permitted food or ingredient

Is the GM food or ingredient permitted – is it listed in Schedule 26 of the Code? Schedule 26 lists permitted foods produced using gene technology and any associated conditions.

- Food derived from

What is the GM food or ingredient derived from?

- Labelling required?

Is labelling required for the GM food or ingredient as required in Standard 1.5.2-4.

- GM food additive or processing aid

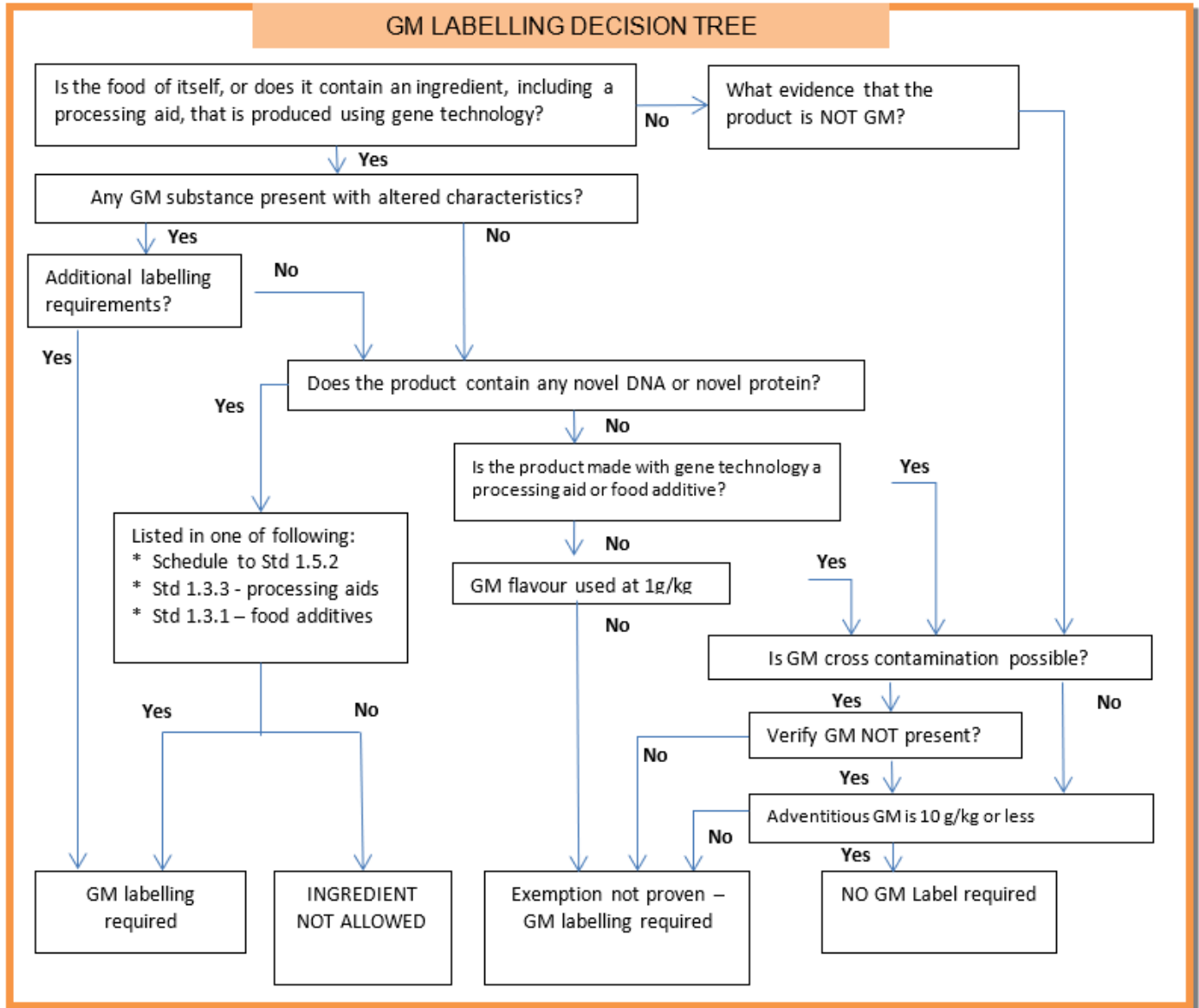
Is the GM substance an additive or processing aid listed in the Schedules to Standards 1.3.1 and/or 1.3.3?

- Amount

Amount of the GM substance present in the product.

The following diagram describes the decision process used to determine if GM labelling is required or not, or if the ingredient is not permitted under the Code.

Figure 3: GM Labelling Decision Tree



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## 4.3 Quarantine Information

### 4.3.1 Quarantine Information

Standard/Schedule Number	Standard Name/ Guidance
<b>Food Import</b>	Imported Food Control Act 1992 Imported Food Control Order 2019 Imported Food Control Regulations 2019 Biosecurity Act 2015
<b>Food Export</b>	Export Control Act 2020 Export Control (Prescribed Goods – General) Order 2005
<b>FSC 1.4.2</b>	Agvet Chemicals
<b>FSC 1.5.3</b>	Irradiation of Food
<b>New Zealand</b>	Biosecurity Act 1993 Animal Products Act 1999 Agricultural Compounds and Veterinary Medicines Act 1997 Australia New Zealand Food Standards Code

#### Australia – BICON

[BICON](#) is the Australian Government’s Biosecurity import conditions database covering plants, animals, minerals, and biological products. BICON is designed to assist in determining what import conditions may exist for the product and if an import permit is required.

Further information on importing food is available on the Department of Agriculture, Fisheries and Forestry [website](#).

It is recommended that companies review the information on the Department’s website to become familiar with the requirements for importing food into Australia.

#### New Zealand – Ministry for Primary Industries (MPI)

All food imported for sale in New Zealand must be safe, fit for human consumption, uncontaminated, and imported through a registered importer.

Further information on food imports into New Zealand can be found on the [MPI website](#).

### 4.3.2 Quarantine Treatments

This section collects information on the type of quarantine treatment that may have been applied to the substance or product the PIF relates to.

The types of treatment are provided in a dropdown list as follows:

- Steam sterilisation
- Irradiation
- Ethylene oxide
- Fumigation

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### *Irradiation*

Irradiation means the processing of food by subjecting it to the action of ionising radiation but does not include ionising radiation imparted to food by measuring or inspection instruments. The PIF requires information if the substance or product has been subject to irradiation.



A food that has been irradiated, or food that contains irradiated ingredients or components, must be labelled to show that the food, ingredients, or components have been treated with ionising radiation.

If the substance or food has been irradiated, is it a permitted Irradiated Food?

Standard 1.5.3 – Irradiation of food sets out the foods that are permitted to be irradiated, the permitted purpose for irradiation and the absorbed dose.

### *Other quarantine treatments*

The use of Ethylene Oxide (ETO) for sterilisation treatment is **prohibited** in Australia and New Zealand. ETO treatment may still be used in some overseas countries and therefore attention should focus on ensuring imported at-risk ingredients have not been ETO treated. While the use of Ethylene Oxide in Australia and New Zealand is no longer permitted, this is not the case in all countries and therefore this question remains relevant.

If another treatment is applied, a description of the treatment is required.

## 5 Nutrition Information

Standard/Schedule Number	Standard Name/ Guidance
<b>ANZ Food Standards Code - 1.1.1</b>	Structure of the Code and General Provisions
<b>FSC 1.2.8</b>	Nutrition Information Requirements
<b>FSC 1.3.2</b>	Vitamins and Minerals

This section collects nutrition information on the substance or product to enable the customer to appropriately label the product and/or products in which the material is used as an ingredient or for the product itself in the case of retail ready products.

*Information per 100g/100mL and per serving*

For **flavours**, only information for the average quantity per 100g/100mL is required to be completed.

For **ingredients** and **flavours**, only information for the average quantity per 100g/100mL is required to be completed. The provision of nutrition information per serving is conditional on whether a serving size has been provided.

Provision of this information for samples is at the discretion of the supplier. Companies may wish to discuss the requirement for this information with the customer.

For **retail ready products** this information is required to be provided for both per 100g and per serving. Companies may be requested to provide this information for finished products that are provided to catering facilities or organisations.

The PIFV6.0 also provides for additional nutrition information per serving to be provided – this is optional but may be used where further information related to use of the product with another food – for example: cereal and milk – is requested or needed.

*Serving size*

This is a number representing the weight or volume of a serving of the product. You will also be prompted to select the unit of measure (UoM) from a dropdown list. The options available are g, kg, mL, or L.

Serving sizes are not defined in the Code and the size of the serving used in the nutrition information panel is not prescribed. Serving sizes are specified by the food business and should reflect a realistic portion of the food that a person might normally consume on one eating occasion.

In determining the appropriate serve size for the product, the guiding serve size principles are:

- Single serve items should be appropriate sizes for the target market.
- The serving portion should be realistic (at both the lower and upper levels).
- If a product is packed such that it can be reasonably expected to be consumed by the target consumer in one serving then the pack should be the serving size, and the energy and nutrient content of the whole pack should be clearly indicated.

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- Multiple serve items should consist of appropriate serving sizes in relation to single serve packs.
- Serving sizes must not be used inappropriately to manipulate energy or nutrient content per serving.

#### *Amount*

This is the amount of the product that makes up a serve – for example: 2 slices of bread, 2 biscuits. This will not be applicable to all types of retail ready products.

#### *Number of servings per pack*

This is the number of servings of a food in the package provided to the customer or for sale to the consumer as a retail ready product.

For example:

	Biscuits	Bread	Yoghurt	Juice
<b>Serving Size</b>	20	30	40	250
<b>Unit of Measure</b>	g	g	g	ml
<b>Amount</b>	2 biscuits	2 slices	3 tablespoons	1 glass
<b>Number of servings per package:</b>	10	15	5	2
	20 in a pack	30 in a pack	200g container	500ml bottle

#### *Moisture content in finished product (required in g/100g)*

Moisture content in finished product (required in g/100g of the food) for products which are supplied to a health facility (e.g., hospital, aged care, mental health facility, nursing home).

#### *Nutrients*

Complete the PIF by inserting the quantity of each nutrient listed. Information on energy, protein, total fat, saturated fat, carbohydrate, sugars, and sodium are mandatory declarations under the Food Standards Code and are required to be completed for a complete Nutrition Information Panel (NIP) on a retail ready product. Following is an example of a NIP with the mandatory nutrients.

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Figure 4: Nutrition Information Panel (NIP) - Example

<b>NUTRITION INFORMATION</b>		
Servings per package: 25 Serving size: 15 g		
	Average Quantity per Serving	Average Quantity per 100 g
Energy	384 kJ	2560 kJ
Protein	4.4 g	29.3 g
Fat, total	7.6 g	50.7 g
– saturated	1.5 g	10.0 g
Carbohydrate	2.0 g	13.3 g
– sugars	0.9 g	6.0 g
Sodium	41 mg	273 mg

Notes for the Nutrition Information Panel:

- The Code requires the use of the text 'less than' rather than the symbol '<' and only permits values up to three significant figures.
- Where the average energy content of a serving or unit quantity of the food is less than 40 kJ, that average energy content may be expressed in the panel as 'less than 40 kJ'.
- Where the average quantity of protein, fat, classes of fatty acids, carbohydrate, sugars or dietary fibre in a serving or unit quantity of the food is less than 1 gram, that average quantity may be expressed in the panel as 'less than 1 g'.
- Where the average quantity of sodium or potassium in a serving of the food, or unit quantity of the food is less than 5 milligrams, that average quantity may be expressed in the panel as 'less than 5 mg'.

Mandatory nutrients

*Energy*

Energy is not a nutrient but, kilojoule content (i.e., the food energy value of the food) is a mandatory declaration in the NIP expressed in kilojoules or in both kilojoules and calories (kilocalories).

The energy content can be listed either in kilojoules or both in kilojoules and calories (kilocalories). Calories can be expressed as 'Cal'. The prescribed conversion factor is one calorie for every 4.18 kilojoules.

Calculation of average energy content is set out in Schedule S11-2 of the Code.

*Protein*

Protein is a macronutrient. Protein content of a food is a mandatory declaration in the NIP. The value is expressed in grams.

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### *Total Fat & Saturated Fat*

Fat is a macronutrient. The two main forms of fat are saturated fat and unsaturated fat.

The term ‘fat’ means **total fat** for the purposes of nutrition labelling and does not differentiate between fats, oils, or other lipid components of foods.

Fat, total, and saturated fat contents are mandatory declarations in the NIP. The values are expressed in grams.

If a claim requiring nutrition information is made in respect of:

- (a) cholesterol; or
- (b) saturated, trans, polyunsaturated or monounsaturated fatty acids; or
- (c) omega-3, omega-6 or omega-9 fatty acids,

the nutrition information panel must include declarations of the trans, polyunsaturated and monounsaturated fatty acids in accordance with Schedule 12—3.

### *Carbohydrate*

Carbohydrate is a macronutrient. Carbohydrate content is a mandatory declaration in NIP. The value is expressed in grams.

Standard 1.2.8 provides that carbohydrate values can be determined by:

- (a) ‘carbohydrate by difference’, calculated by subtracting from 100, the average quantity expressed as a percentage of water, protein, fat, dietary fibre, ash, alcohol, and if quantified or added to the food, any other unavailable carbohydrate and the substances listed in S11-2(3); or
- (b) ‘available carbohydrate’, calculated by summing the average quantity of total available sugars and starch, and if quantified or added to the food, any available oligosaccharides, glycogen, and maltodextrins.

This question requires that the method used to determine the carbohydrate content is specified using either of these two methods, or if by another method then to specify what this is.

**Note: Carbohydrate should NOT include dietary fibre under ANZ food labelling regulations.**

### *Sugars*

Sugars are a sub-group of carbohydrates.

For the purpose of Standard 1.2.7, Standard 1.2.8 and Schedule 4 (except where it appears with an asterisk as ‘sugars\*’)—means monosaccharides and disaccharides (elsewhere in the Code it has a different definition).

## Sodium

The sodium content can be listed either in milligrams (mg).

**Note:** If a claim requiring nutrition information is made in relation to salt or sodium, the nutrition information panel must include a declaration of the average quantity of potassium in the product in accordance with Schedule S12—3.

### Additional nutrients

Any vitamin, mineral or biologically active substance can be inserted into the cells at the bottom of the nutrition information table. For example, any vitamin or minerals can be listed here.

If a claim is made about another nutrient or biologically active substance the NIP must include a declaration of the average quantity the substance.

### Dietary fibre

Schedule S11-4 sets out methods of analysis for dietary fibre and other fibre content.

Standard 1.1.12 sets out the definition of dietary fibre as follows:

**dietary fibre** means that fraction of the edible part of plants or their extracts, or synthetic analogues that:

(a) are resistant to digestion and absorption in the small intestine, usually with complete or partial fermentation in the large intestine; and

(b) promote one or more of the following beneficial physiological effects:

(i) laxation;

(ii) reduction in blood cholesterol;

(iii) modulation of blood glucose;

and includes:

c) polysaccharides or oligosaccharides that have a degree of polymerisation greater than 2; and

(d) lignins.

If a claim requiring nutrition information is made in respect of: (a) fibre or any specifically named fibre; or (b) sugars or any other type of carbohydrate; a nutrition information panel must include a declaration of the presence or absence of dietary fibre in accordance with Schedule S12—3.

## Gluten

Gluten is a required field if a 'gluten free' or 'low gluten' claim is made.

For gluten, the alternative text 'not detected' may be used, consistent with the reporting requirement in the Code.

## Vitamins and Minerals

If a claim is made about a vitamin or mineral the nutrition information panel must include a declaration of the average quantity the substance in the product.

### *Potassium*

If a claim requiring nutrition information is made in relation to salt or sodium, the nutrition information panel must include a declaration of the average quantity of potassium in the product in accordance with Schedule S12—3.

### *Phosphorus*

This information is required if your product is to be supplied to a health facility such as a hospital, aged care, mental health facility, nursing home.

Healthy kidneys can remove extra phosphorus in the blood. But with a chronic kidney disease (CKD), the kidneys can't remove phosphorus very well. Extra phosphorus causes body changes that pull calcium out of your bones, making them weak.

### *Vitamins – form*

If the Vitamin is naturally occurring, then enter 'Naturally occurring' in this field.

### *Minerals – form*

If the Mineral is naturally occurring, then enter 'Naturally occurring' in this field.

### *Biologically active substances*

A *biologically active substance* means a substance, other than a nutrient, with which physiological or health effects are associated.

If a claim is made about another nutrient or biologically active substance the nutrition information panel must include a declaration of the average quantity the substance in the product.

### *% Daily Intake*

Daily intake reference values provide information on the total amount of energy, protein, fat, saturated fatty acids, carbohydrate, sugars, dietary fibre, and sodium to be consumed daily by an 'average' adult, based on an 8700kJ diet in accordance with national dietary guidelines. Percentage daily intake (%DI) information therefore expresses the percentage of the daily intake for these nutrients and energy that will be obtained from consuming one serving of the food.

Percentage daily intake values must be calculated using the daily intake reference values stated in the table in subclause 1.2.8-8 (3)(a) of the Code.

The %DI values are based on a single set of average reference values for adults and as such, are not directly applicable to individual needs or specific sub-groups of the population such as children.

Where %DI values are displayed in the nutrition information panel, energy, protein, fat, saturated fatty acids, carbohydrate, sugars, and sodium provided by the food must all be listed. It is at the discretion of the food business whether %DI for dietary fibre is included.

One of the following statements must also be included in the nutrition information panel where %DI values are included:

‘\*based on an average adult diet of 8700 kJ’.

‘\*Percentage daily intakes are based on an average adult diet of 8700 kJ.’

#### *% RDI*

Percentage RDI (Recommended Dietary Intake) information expresses the percentage of the RDI of certain vitamins and minerals, that will be obtained from consuming one serving of the food. Percentage RDI information must be provided if a claim requiring nutrition information is made about or based on a vitamin or mineral that has an RDI listed in the Code. The vitamins and minerals with RDIs are listed in Schedule 1 – S1-2 and S1-3.

The percentage of the RDI (%RDI) for the claimed vitamin or mineral contributed by one serving of the food must be set out in the nutrition information panel. Where %RDIs are included in the nutrition information panel, the %RDIs must be calculated using the RDIs listed in Schedule 1 and the applicable nutrient values set out in the nutrition information panel. The following formula could be used to determine the %RDI:

$$\%RDI = \frac{\text{Quantity of vitamin or mineral in a serving}}{RDI} \times 100$$

#### *Target population*

The target population can be selected from a dropdown list in the PIF from the following options:

- Food for infants
- Food intended for or represented as suitable for use by children aged 1-3 years, or
- Any other food.

#### *Information about the food product*

If the product is a liquid, or a liquid concentrate these questions collect information concerning the specific gravity, and relevant dilution rates. Similarly, if the product is dehydrated and is required to be reconstituted, there are questions about how the product is reconstituted, or if the product is suspended in liquid and required to be drained.

The following information will be required to be provided:

- Liquid type – single strength, ready for use OR concentrate
- Reconstitution instructions
- If solid:
  - Solid, dehydrated substance
  - Solid substance suspended in liquid
  - Solid, semi-solid or powder substance, intended for use in further preparation
  - Solid, semi-solid or powder substance, ready for consumption
- Rehydration rate if required

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### *Source of nutrition information*

There are several methods that are commonly used to derive food composition data to develop a NIP. These include:

- laboratory analysis of the food
- the FSANZ Nutrition Panel Calculator (NPC) (free online software)
- other commercial software
- food composition tables or databases.

#### *Laboratory analysis*

Foods can be analysed directly, preferably by laboratories accredited by either the National Association of Testing Authorities (NATA) or International Accreditation New Zealand (IANZ).

#### *Nutrition Panel Calculator*

The [Nutrition Panel Calculator](#) (NPC) is a free on-line tool designed to assist food businesses to calculate the average nutrient content of their food products and to prepare a NIP.

#### *Other commercial software*

There are a small number of software companies that develop other nutritional analysis software.

#### *Food composition databases*

##### **Australia**

FSANZ has two food composition databases that are freely available to industry via the FSANZ website:

- AUSNUT 2011-13, and
- NUTTAB 2010.

[AUSNUT 2011–13](#) is a set of files that enables food, dietary supplement and nutrient intake estimates to be made from the 2011–13 Australian Health Survey (AHS). It includes foods and dietary supplements consumed as part of the 2011–12 National Nutrition and Physical Activity Survey (NNPAS) and the 2012–13 National Aboriginal and Torres Strait Islander Nutrition and Physical Activity Survey (NATSINPAS) components of the AHS.

#### [The Australian Food Composition Database](#)

This is a reference database that contains data on the nutrient content of Australian foods. It is referred to as a reference database because it contains mostly analysed data. Only a small proportion of data in the database come from other sources such as recipe calculations, food labels, imputing from similar foods or by borrowing from other countries.

Release 2 of the Australian Food Composition Database contains nutrient data for 1,616 foods available in Australia and up to 256 nutrients per food. It is the most recent reference database with data preparation completed in 2021.

The database used to be call NUTTAB.

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## New Zealand

In New Zealand, [The New Zealand Food Composition Database](#) (New Zealand Plant and Food Research and the Ministry of health) contains New Zealand nutrient data of over 2,700 foods commonly prepared and eaten in New Zealand.

## 6. Claims

Standard/Schedule Number	Standard Name/ Guidance
<b>ANZ Food Standards Code - Schedule 5</b>	Nutrient profiling scoring method
<b>Health Star Rating (HSR)</b>	Guide for Industry to the Health Star Rating Calculator
<b>Guidance (AFGC)</b>	AFGC Best Practice Guide – Daily Intake Style Guide

The details in this section are to be completed to provide information to assist the customer to determine the suitability of certain claims in relation to the ingredient or product.

While the supplier may not wish to make these claims about the ingredient or product, the customer may wish to do so, and they will require this information to ensure compliance with the relevant regulations.

Substantiating information for any claim can be provided as an attachment in the attachment field.

### 6.1 Nutrition, Health, and Related Claims

Regulatory requirements for making nutrition content and health claims are described in *Standard 1.2.7 Nutrition, Health, and Related Claims* of the Code.

If a claim is being made the PIF requires responses to the following sections.

*Are you making a Nutrition content and/or Health claim in relation to this product?*

This is a Yes/No response – if the response is 'No' then no further information in this section is required.

If the response is 'yes' to this question, the type of claim(s) from the following options must be selected:

- **Nutrition content claim**

Nutrition content claims are claims about the content of certain nutrients or substances in a food, such as '*low in fat*' or '*good source of calcium*'. These claims will need to meet certain criteria set out in the Standard. For example, with a '*good source of calcium*' claim, the food needs to contain at least the amount of calcium specified in the Standard.<sup>7</sup>

- **High level health claim**

High level health claims refer to a nutrient or substance in a food and its relationship to a serious disease or to a biomarker of a serious disease. For example: Diets high in calcium may reduce the risk of osteoporosis in people 65 years and over. An example of a biomarker health claim is: '*Phytosterols may reduce blood cholesterol*'.

<sup>7</sup> <http://www.foodstandards.gov.au/consumer/labelling/nutrition/Pages/default.aspx>, accessed 22.09.2018

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- **General level health claim**

General level health claim refers to a nutrient or substance in a food, or the food itself, and its effect on health. For example: *'calcium for healthy bones and teeth'*. They must not refer to a serious disease or to a biomarker of a serious disease.<sup>8</sup>

- **General level health claim - self substantiated**

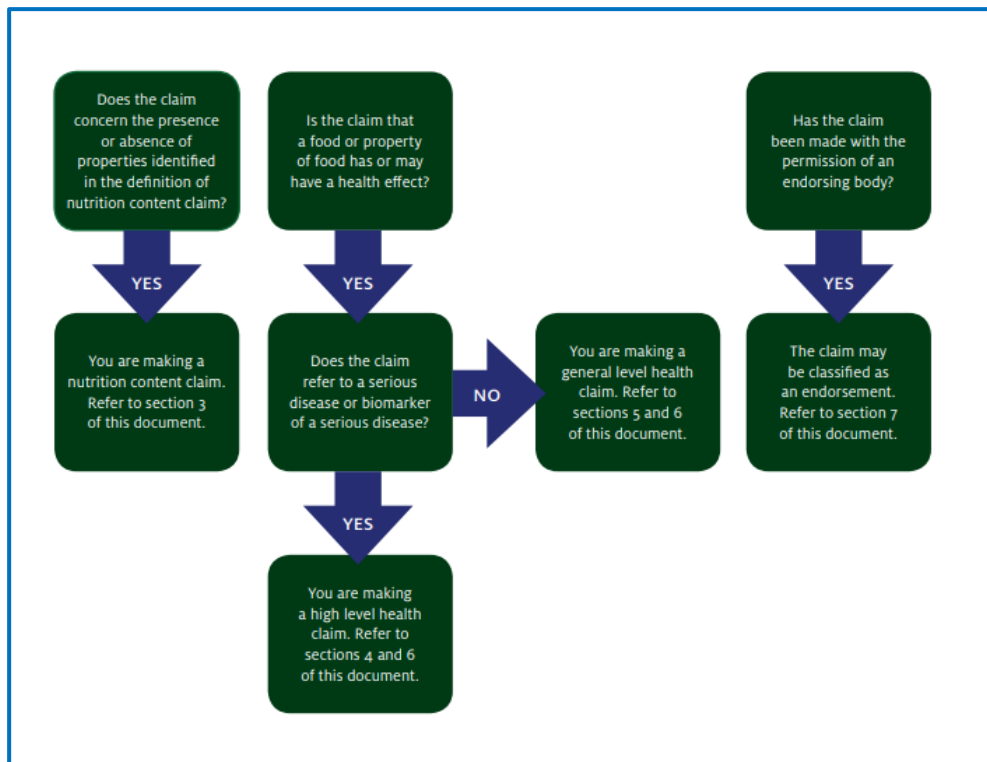
General level health claim - self substantiated refers to a process whereby a business or entity can self-substantiate a food-health relationship by following the process for systematic review as described in Schedule 6 of the Code.

Food businesses self-substantiating a food-health relationship so they can make a general level health claim must notify FSANZ of the relationship before making the claim on food labels or in advertisements for food.

FSANZ maintains a list of the notified food-health relationships. This is a public record of food businesses that have chosen to self-substantiate a food-health relationship to underpin a general level health claim.<sup>9</sup>

The following diagram is taken from the "[Getting Your Claims Right](#)" document developed by the Implementation Subcommittee for Food Regulation (ISFR) and is useful in assisting with determining what type of claim being made.

Figure 5: Are you making a nutrition content, health, or related claim?



<sup>8</sup> As per #5

<sup>9</sup> <http://www.foodstandards.gov.au/industry/labelling/Pages/Nutrition-health-and-related-claims.aspx>, FSANZ, accessed 30.07.2022

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### 6.1.1 Nutrition Content and/or Health Claim

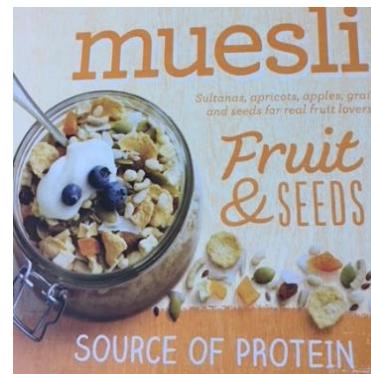
If a **Nutrition Content** Claim is selected, the following information is required:

- Property of the food means a component, ingredient, constituent or other feature of food – for example – calcium or dietary fibre.
- The claim, for example – “low cholesterol” or “good source of dietary fibre”, and
- List the amount of the property of the food (e.g.: calcium) per 100g or 100ml (for the GI, the number) and the amount per serve.

Figure 6: Nutrition content claim - source of fibre



Figure 7: Nutrition content claim - source of protein



If a **High-Level** health claim is selected, the wording for the claim must be entered. The claim wording must be based on the conditions for permitted high level health claims set out in Schedule S4-4 of the Code.

**For example:** A diet high in fruit and vegetable intake reduces the risk of coronary heart disease

If a **General Level** health claim is selected, the wording of the claim must be entered.

**For example:** This product is a source of protein to help nourish growing muscles.

If a **General Level** health claim – **self substantiated** is selected, the following information must be entered:

- The food or property of the food - meaning a component, ingredient, constituent, or other feature of food.
- The health effect – for example – provides sustained energy; contributes to immune function.
- The claim – this is the wording on the claim based on the health effect.
- Who holds the claim dossier?

A self-substantiated general level health claim requires a systematic review to be carried out and [notified to FSANZ](#).

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The systematic review must be carried out according to the requirements of Schedule 6 – Required elements of a systematic review – of the Code.

The dossier should be held on file by the company/business making the claim. The response to this question could be the name of the company and a contact at the company – this information is required in case there are questions about the claim or the substantiation information.

- Has the claim been notified to FSANZ and if yes, when?

*Standard 1.2.7* of the Code requires a person who is self-substantiating a food-health relationship in order to make a general level health claim to notify the Chief Executive Officer of FSANZ of the relationship before making a claim on food labels or in advertisements for food.

The person notifying must certify that the food-health relationship has been established by systematic review in accordance with *Standard 1.2.7*.

FSANZ does not consider the merits of notified food-health relationships. While FSANZ administers the notification process, publication of a notification by FSANZ does not indicate acceptance, approval, or validation of the relationship.

#### 6.1.2 Nutrient Profile Score (NPS) or Health Star Rating (HSR) Calculation Information

Standard/Schedule Number	Standard Name/ Guidance
<b>ANZ Food Standards Code - 1.2.7</b>	Nutrition Health and Related Claims
<b>FSC Schedule 5</b>	Nutrient profiling scoring method

To calculate the nutrient profile score or a Health Star Rating for a product you will need to know the fruit, vegetable, nuts and legumes (fvnl) content of the ingredient or product.

This information may be required by your customer.

Fruit and vegetable points (V points) can be scored for fruits, vegetables, nuts, and legumes including coconut, spices, herbs, fungi, seeds, and algae (**fvnl**) including:

- fvnl that are fresh, cooked, frozen, canned, pickled or preserved; and
- fvnl that have been peeled, diced, or cut (or otherwise reduced in size), puréed or dried.

To calculate fruit and vegetable (V) points the following information is required:

- Percentage of the non-concentrated fvnl ingredients in the food
- Percentage of concentrated (or dried) fruit or vegetable ingredients in the food
- Percentage of non-fvnl ingredients in the food

Further information is set out in Schedule 5 – Nutrient profiling scoring method, of the Code.

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## 6.2 Front of Pack Labelling

The application of front of pack labelling schemes such as Health Star Ratings and Daily Intake are at the discretion of the business.

### 6.2.1 Health Star Rating (HSR)

If calculation of a Health Star Rating for the product is required a link to the [Health Star Rating System website](#) is provided.

If not, the option to determine Daily Intake Guide is values is provided.

If this is selected there are prompts to provide further information.

The HSR is not calculated within the PIF. A link to the [HSR website](#) is provided where calculation can be completed. To do the calculation, the following information is required:

#### Food category:

Food Category	Description
1	Beverages other than dairy beverages
1D	Dairy beverages
2	All foods other than those included in Category 1, 1D, 2D, 3 or 3D
2D	Dairy foods other than those included in Category 1D or 3D
3	Oils and spreads, defined as follows: <ul style="list-style-type: none"> <li>• edible oil as defined in Standard 2.4.1</li> <li>• edible oil spreads as defined in Standard 2.4.2</li> <li>• margarine as defined in Standard 2.4.2</li> <li>• butter as defined in Standard 2.5.5</li> </ul>
3D	Cheese and processed cheese as defined in Standard 2.5.4 (with calcium content >320 mg/100 g)

#### Form of the food:

the food as sold if the food can be either prepared with other foods or consumed as sold
the food as prepared if the food is required to be prepared and consumed according to directions on the label
the food after it is reconstituted with water and ready for consumption if the food requires reconstituting with water
the food after it is drained and ready for consumption if the food requires draining before consuming.



## HSR score

The HSR calculator will provide a score and advise the number of stars assigned to a product.

Figure 8: Health Star Rating Example

The Health Star Rating for your product Crunchy Muesli is : 3


Food Name : Crunchy Muesli

Company Name : The Crunchy Muesli Company

Date of Calculation : 22/09/2018 15:00:50

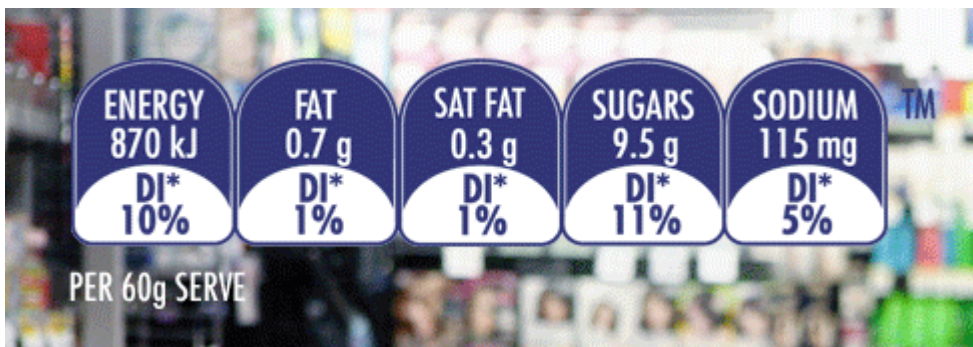
Email : crunchymuesli@gmail.com

FoPL Category : 2



**Note:** this is a mocked-up calculation – this product and company do not exist.

### 6.2.2 [Daily Intake Guide](#)



The option to determine the Daily Intake Guide (DIG) amounts for this Product is provided. If selected there is a link to the [DIG website](#).

If this is selected prompts for further information are provided.

DIG values are not calculated within PIF V6.0. To determine the Daily Intake Guide (DIG) amounts for the product, follow the link provided to the [DIG website](#).

The following information for the nutrients to which the DIG applies are required:

- Name of the nutrient or Energy
- Amount per serve (g)
- % Daily Intake per serve

### 6.3 [Certification, Endorsement and Other Claims](#)

The information in this section is to be completed to provide information to assist determining the suitability of the product for use in certain products or to make certain claims.

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### 6.3.1 Nutrition and Health Logos and Symbols

#### Gluten free

The claim '*gluten free*' is regulated as a nutrition content claim under Standard 1.2.7. The requirements for making a gluten free claim are set out in Schedule 4 of the Code:

The food must not contain:

- (a) detectable gluten; or
- (b) oats or oat products; or
- (c) cereals containing \*gluten that have been malted, or products of such cereals.

If the ingredient or product meets the requirements to make a claim gluten free, the following information will be requested:

- How has this been validated/substantiated?

For example – no ingredients contain gluten, testing indicates there is no gluten present

- A Gluten Free logo will be used (Y/N)

Coeliac Australia and Coeliac New Zealand (and similar organisations in other countries) provide endorsement programs which permit the use of the Crossed Grain logo under a licence agreement.



For example: Coeliac Australia Crossed Grain logo

- Certificate Available? (Y/N)

If a gluten free logo is used, the certificate number and expiry date as evidence of permission to use the logo is requested.

#### Glycaemic Index (GI)



The GI Foundation certifies products as eligible to carry the low GI symbol on packaging under a licence agreement.

If the GI logo is used, the certificate number and expiry date as evidence of permission to use the logo is requested. The GI value of the ingredient or product is requested also.

### *Be Treatwise*

Established in 2006, '*Be treatwise*' is a confectionery industry initiative designed to provide consumers with information to help explain the place that confectionery has, as a treat food, that can be enjoyed as part of a balanced diet and active lifestyle.

The *Be treatwise* logo provides a visual cue on the front of confectionery packs to remind consumers that confectionery is a treat. With its logo and tagline, '*Enjoy a balanced diet*', *Be treatwise* helps consumers to understand the importance of eating treats in moderation.



If this logo is to be used or may be used on products some information in the PIF requested.

### 6.3.2 *Religious*

#### *Halal*

The term Halal refers to the type of food that is permitted for consumption by people of the Islam faith. Halal Foods must be certified, however information on whether the product would be suitable for Halal certification is also useful.

When Halal certified a copy of the current valid certificate must be attached to the PIF. Copies of renewed certificates are to be supplied to the customer as they become available over time.

#### *Kosher*

Kosher foods are selected and prepared to meet traditional Jewish ritual and dietary laws. Kosher foods must be certified, however information on whether the product would be suitable for Kosher certification is also useful.

When kosher certified, a copy of the current valid certificate must be attached. Copies of renewed certificates are to be supplied to the customer as they become available over time.

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### 6.3.3 Dietary Choice

The following definitions are based on ISO 23662:2021(E) – ‘Definitions and technical criteria for foods and food ingredients for vegetarians or vegans for labelling and claims.’

#### *Ovo-lacto-vegetarian*

Foods and food ingredients (including additives, processing aids flavourings, enzymes, and carriers) that are not products of animal origin except for the following (including their components or derivatives):

- milk and dairy products or colostrum
- egg or egg products obtained from living animals
- honey or bee products
- products derived from the wool of living animals

#### *Ovo-vegetarian*

Foods and food ingredients (including additives, processing aids flavourings, enzymes, and carriers) that are not products of animal origin except for the following:

- egg or egg products obtained from living animals
- honey or bee products
- products derived from the wool of living animals

#### *Lacto-vegetarian*

Foods and food ingredients (including additives, processing aids flavourings, enzymes, and carriers) that are not products of animal origin except for the following:

- milk and dairy products or colostrum
- honey or bee products
- products derived from the wool of living animals

#### *Vegan*

Foods and food ingredients (including additives, processing aids flavourings, enzymes, and carriers) that are not products of animal origin.

#### 6.3.4 Free

Free claims are commonly used in reference to the absence of a substance such as gluten free, or free from artificial colours, fat-free, sugar-free etc. Care needs to be taken in meeting substantiation requirements and consider the ACCC / NZ Commerce Commission requirements about detectable/trace levels of a substance in a product where there is a 'free from' claim.

##### *Hormone free*

Hormone growth promotants (HGPs) are naturally occurring hormones such as oestrogen, or synthetic alternatives, which are used in cattle to accelerate weight gain. They improve the efficiency by which cattle convert stockfeed into meat, allowing cattle to be processed earlier with less stock feed consumed. HGPs applied to cattle in Australia contain naturally occurring hormones (oestrogen, progesterone, and testosterone) or synthetic hormones (trenbolone acetate and zeranol).

If a product is hormone free and so qualifies for the claim the information can be recorded in this section of the PIF.

#### 6.3.5 Sustainability Claims

##### *Organic*

Organic foods are produced without the use of synthetic fertilisers/pesticides/herbicides or other chemicals, antibiotics, or genetically modified organisms and with emphasis on sustainability and responsible land & environment management.

Organic standards used in Australia are generally owned and managed by private organisations. Domestically marketed organic products are commonly certified by one of Australia's six private certifiers who base their certification standards on the [National Standard for Organic and Biodynamic Produce Edition 3.8](#) November 2022. This came into effect on 01 January 2023.

If the Australian certified organic (bud) logo is used, claims should be certified against the [Australian Certified Organic Standard](#).

Companies can also refer to the voluntary Australian Standard for Organic and biodynamic products, AS 6000-2015 (Australian Standard).

When certified organic, a copy of the current valid certificate must be attached. Copies of renewed certificates are to be supplied to the customer as they become available over time.

##### *Biodynamic*

Biodynamic is a form of organic farming. Both organic and biodynamic farms grow their food without the use of pesticides, herbicides, or genetically modified organisms (GMOs)

When certified biodynamic, a copy of the current valid certificate must be attached to the PIF. Copies of renewed certificates are to be supplied to the customer as they become available over time.

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### *RSPO (Roundtable on Sustainable Palm oil)*

The [RSPO](#) has developed a set of environmental and social criteria with which companies must comply in order to produce Certified Sustainable Palm Oil (CSPO). When they are properly applied, these criteria can help to minimize the negative impact of palm oil cultivation on the environment and communities in palm oil-producing regions.

When certified CSPO, a copy of the current valid certificate must be attached. Copies of renewed certificates are to be supplied to the customer as they become available over time.

### *Rainforest Alliance*

[Rainforest Alliance](#) certification demonstrates to consumers that products have been sourced from farm to shop in a sustainable manner.

When certified by Rainforest Alliance, a copy of the current valid certificate must be attached. Copies of renewed certificates are to be supplied to the customer as they become available over time.

### *6.3.6 Animal Welfare*

#### *Animal Welfare Approved Schemes*

There are several animal welfare schemes available for companies to be certified against and/or use certification logos under licencing agreements.

This section of the PIF allows information to be recorded which is relevant to the product in relation to animal welfare certification and practices.

For example – the RSPCA run an [Approved Farming Scheme](#) which is available to both producers and brand owners.

#### *Marine Stewardship*

The [Marine Stewardship Council](#) provide a certification program to show that fish comes from a sustainable source.

When certified by the MSC, a copy of the current valid certificate must be attached. Copies of renewed certificates are to be supplied to the customer as they become available over time.

#### *Dolphin Friendly*

**Dolphin-safe labels** are used to denote compliance with laws or policies designed to minimize dolphin fatalities during fishing for tuna destined for canning.

There are a variety of labels/logos and criteria which apply to the different logos and companies should ensure they are familiar with the requirements of any logo they choose to use.

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### *Sow stall free*

The term 'sow-stall free' is used to differentiate pork product from pigs that have been born to sows in group housing. The pig industry defines 'sow-stall free' as a system where a sow may have been kept in a stall for up to 5 days following last mating up to one week before farrowing; however, other definitions allow only one day in a stall. These stalls are called 'mating stalls', are very similar to a sow stall, and are used at mating to prevent aggression between sows and hence potential injury or abortion. Following this period of confinement, the sow is housed in groups with other pregnant sows'.

### *Free range*

Free-range animals are animals that have some access to the outdoors. How much access, how often, and how big the outdoor area is can vary greatly.

The [ACCC Advertising and Selling Guide](#) provides some general guidance on 'free range' claims.

#### *Free-range eggs*

Free-range eggs come from hens that should have access to an outdoor area during the day. At night, large flocks of free-range hens are kept in sheds or barns to keep them safe from predators, while smaller flocks may be kept in moveable sheds to allow rotational use of the range area.

Guidance on the use of free-range claims can be found on the Australian Competition and Consumer Commission website – [ACCC Enforcement Guidance – free range hen egg claims](#).

#### *Free-range pork*

Free-range pork comes from pigs that were born and raised with free access to the outdoors. That is, where the sows and growing piglets have access to paddocks, as well as huts or other forms of housing for shelter, and are not confined to sow stalls (for pregnant sows) or farrowing crates (for lactating sows and their piglets).

#### *Bred free-range pork*

'Bred free range' is a term used to apply to pig products (pork, bacon, etc) from pigs that were born in a free-range environment but were subsequently raised indoors. These pigs may be raised in large open sheds with straw bedding (known as eco shelters) or in small pens on concrete floors as in conventional pig farming systems.

#### *Free-range chicken or turkey meat*

Free-range chicken or turkey meat come from chickens and turkeys that have access to an outdoor area during the day. At night, free-range chickens are kept in sheds or barns. Turkeys may have continuous access to the outdoors. Conditions on free-range farms vary greatly. On some farms, the range area is large, provides grass for foraging, has access to shade and shelter, and all birds are able to come and go from the range during the day; on others, the range area may be less attractive for the birds.

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### 6.3.7 Other

*Derived from naturally occurring ingredients & Derived from a natural process without chemical modification*

'Natural' claims imply that the product is made up of natural ingredients, i.e. ingredients nature has produced, not man made or interfered with by man.

Care should be taken with such claims as Consumers may view what is 'natural' differently to manufacturers and food technologists.

The [New Zealand Commerce Commission](#) also has information available on its website around making accurate claims.

#### *Additional Claims*

This section allows for additional claims about the product that are not specifically mentioned in this section.

The following information is requested:

- The claim(s)
- How has this been validated/substantiated?
- Whether there is a certificate available
- The certifying body (if applicable)
- The certificate expiry date

## 7. Shelf Life

This section collects information on the shelf life of the product, temperature requirements to maintain shelf life, and the useability of the product once the packaging is opened.

Date marking is an indication by the manufacturer of the length of time that an ingredient or a food can be kept under specified storage conditions before it starts to noticeably deteriorate, i.e., when it is in “best condition”. Date marking is also used to indicate when food will deteriorate to a point when it is unfit for consumption and may present a food safety risk, and therefore should be discarded.

*Standard 1.2.5* requires that packaged foods with a shelf life of less than two years must be labelled with either a ‘Use-by’ or ‘best before’ date. The ‘Use-by’ date signifies the estimated maximum storage in accordance with any stated conditions, after which the intact package of food should be discarded due to health and safety concerns.

The ‘best before’ date is applied to foods that will not present a health and safety concern after that date and is the maximum period within which the foods remain marketable and retains any specific qualities for which express or implied claims have been made.

While *Standard 1.2.5* applies to packaged foods for retail sale, similar principles apply to ingredients used in further processing and the manufacture of foods.

No single factor can be relied on to determine shelf life, whether microbial, chemical, or organoleptic.

Standard/Schedule Number	Standard Name/ Guidance
<b>ANZ Food Standards Code - 1.2.5</b>	Information requirements – date marking of food for sale
<b>FSC 1.2.6</b>	Information requirements – directions for use and storage
<b>Guidance (AFGC)</b>	AFGC Best Practice Guide – Date Marking

Shelf-life determination requires an evaluation of all these parameters and cannot be determined by guess work or by copying the shelf life of a similar product from another source.

Information to assist you with this section is available in the [AFGC Date Marking Guide](#).

In this section of the PIF the following information for the packaged product is requested:

- Type of date mark applied – use by, best before, baked for, baked on, packed on.
- Shelf life in days, weeks, months, or years depending on the product.
- Whether temperature control is required during storage and if yes, the temperature value which may be a number, a range, minimum or maximum.
- Whether temperature control is required during transport and if yes, the temperature value which may be a number, a range, minimum or maximum.
- For both, you will be asked the time out of refrigeration (if applicable).

Secondary storage of products is dependent on handling and storage post-opening and where relevant the manufacturer/supplier should provide appropriate advice on the storage conditions to

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achieve the intended in-use once opened shelf life. For products which do not have resealable package guarantees are not provided for expected shelf life as this is outside the manufacturer's control.

For the product once opened the following information is requested:

- Whether temperature control is required during storage and if yes, the temperature value which may be a number, a range, minimum or maximum.
- Whether temperature control is required during transport and if yes, the temperature value which may be a number, a range, minimum or maximum.
- For both, you will be asked the time out of refrigeration (if applicable).

An option to provide general comments about the date coding applied to the product is offered.

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## 8. Traceability

Standard/Schedule Number	Standard Name/ Guidance
<b>ANZ Food Standards Code - 1.2.2</b>	Food Identification Requirements

Product traceability is important to ensure that you can identify the product in the event that the supplier or the customer needs to retrieve it in the event that a food safety or quality issue occurs.

### 8.1 Primary and Shipper Code

Details for the **primary code** on the product as applicable are requested:

- Type of primary coding for the unit. This question has a set dropdown list with the following options:
  - Date code
  - Product code
  - Batch number
  - Lot number
- Method of coding – this relates to the way in which the coding is applied – for example – by an ink jet printer.
- Location of the code – where on the product packaging the code is located – you may wish to provide a picture of diagram to illustrate the location.
- Number of characters in the code
- Example of the code format - you may wish to provide a picture of diagram to illustrate the format of the code.
- Code translation – what does the code mean – for example – a Julian code may be used.

A Julian date is sometimes used to refer to a date format that is a combination of the current year and the number of days since the beginning of the year. For example, January 1, 2007, is represented as 2007001 and December 31, 2007, is represented as 2007365.

Coding information for the **Shipper** is requested if applicable:

- Type of primary coding for the shipper. This question has a set dropdown list with the following options:
  - Date code
  - Product code
  - Batch number
  - Lot number
- Method of coding
- Location of the code
- Number of characters in the code
- Example of the code format
- Code translation

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## 8.2 General Information

This section gives the option to provide any general comments about the traceability coding applied to the product. This is a free text field which can be used to provide any further information that you consider relevant to the traceability of the product.

## 9. Measurement Marking

Standard/Schedule Number	Standard Name/ Guidance
	<a href="#">National Trade Measurement Regulations 2009</a>
	<a href="#">National Measurement Act 1960</a>

Under Australian national trade measurement legislation, manufacturers, packers, importers, and sellers of pre-packed articles must:

- ensure packages are correctly labelled; the laws include requirements for measurement marking and packer’s identification
- ensure packages they import, pack, or sell include a measurement marking
- ensure the measurement marking is accurate and does not include the weight of any packaging material
- have appropriate measuring instruments: any measuring instruments used to perform compliance sampling must be suitable for the task, and properly maintained to ensure they remain accurate at all times, and

The following information for a retail ready product only is requested:

- The method of trade measurement marking used:
  - Average quantity (AQS)
  - Net quantity

If AQS is selected, the statistical variance in the fill measurement is requested.

- Pack size
- Target fill (if applicable)
- Drained weight (if applicable)

For PIFs prepared for **flavours** information on pack size is requested

### *Average Quality System (AQS)*

The average quantity system (AQS) is an internationally agreed method for determining the size or quantity of pre-packed articles with a ‘constant nominal content’. This means it provides confirmation of the measurement or quantity of goods in the package, being sold by measure (weight, volume, length, or area) or count (number of items).

### **Under the AQS:**

- The average net content in a sample from the production run of pre-packed articles cannot be less than the stated quantity marked on the packages.
- Allowance is made for a small number of pre-packages to exceed a ‘tolerable deficiency’.
- None of the pre-packages in the sample can have more than twice the prescribed tolerable deficiency.

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AQS provides a 97.5% assurance that goods are the correct quantity within the prescribed tolerances. These tolerances are proportional to the quantity of product and related difficulty of accurate filling.

Information on the AQS is available on the [National Measurement Institute](#) (NMI) website.

*Net quantity*

Under the Net Quantity system:

- The average content in a sample of pre-packed articles of the same measurement cannot be less than the stated quantity marked on the packages.
- No pre-packed article can have a shortfall greater than 5% of the stated quantity.

It is up to the manufacturer to decide which system of measurement marking is applied to the product. Whichever system is chosen, records must be maintained to demonstrate compliance.

## 10. Potential Safety Hazards

Standard/Schedule Number	Standard Name/ Guidance
	Hazardous and dangerous chemicals regulations

Dangerous goods are substances or articles that present an immediate hazard to people, property, or the environment. They are often highly concentrated substances like acids or contain large amounts of embodied energy such as flammable liquids.

Some dangerous goods can react and burn violently, explode and/or emit toxic fumes and gasses if mixed together, spilt, or involved in fire. For this reason, they are labelled with a relevant dangerous goods' 'diamond' sign. The classes of dangerous goods are:

CLASS	DESCRIPTION
<b>Class 1</b>	Explosives
<b>Class 2</b>	Gases: compressed, liquified or dissolved under pressure
<b>Class 3</b>	Flammable Liquids
<b>Class 4</b>	Flammable Solids
<b>Class 5</b>	Oxidizing Agents and organic peroxides
<b>Class 6</b>	Toxic and Infection Substances
<b>Class 7</b>	Radioactive Materials
<b>Class 8</b>	Corrosive substances and articles
<b>Class 9</b>	Miscellaneous Dangerous Goods

Further information is provided in Appendix 1.

While it is unlikely that a food ingredient will fall into some of these categories, the full list is provided for the sake of completeness rather than any expectation that there will be a need to declare a Class 6 Toxic ingredient.

Hazardous chemicals used in the workplace can cause immediate and/or long-term impacts on health if not used safely. There are known carcinogenic or cancer-causing substances that are listed as notifiable or prohibited and relevant regulators must be notified before use.

Any workplace that produces or uses a chemical must assess the risks of potential exposure to workers by the chemicals produced in the workplace. Potential hazards identified in the health effects review must be recorded by manufacturers and suppliers on the product labels and Safety Data Sheet using prescribed risk phrases. The Safety Data Sheet (SDS) and the product label are the primary sources of health hazard communication from the manufacturer/supplier to employees in the workplace.

The transport of dangerous goods by land is regulated by the relevant State or Territory department of environment or environmental protection legislation.

A Safety Data Sheet (SDS) is designed to provide both workers and emergency personnel with the proper procedures for handling or working with a particular substance. SDS's include information such as physical data (melting point, boiling point, flash point etc.), toxicity, health effects, first aid, reactivity, storage, disposal, protective equipment, and spill/leak procedures. These are of particular

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use if a spill or other accident occurs and are necessary in managing occupational health and safety responsibilities for employees.

There are large collections of SDS available on the internet and from a variety of sources, such as government agencies, manufacturers, universities, international non-government organisations, etc.

Where the information is publicly available on the internet for the relevant hazardous substance then the internet website address should be provided for ease of access to the information.

Otherwise, a copy of the SDS should be provided as an attachment with the PIF when provided to customers.

#### *Potential Safety Hazards*

In this section of the PIF information regarding potential hazards associated with the ingredient or product is requested.

If hazards are identified the following information should be provided

- if the hazards occur during transport, handling, storage and/or disposal. More than one option can be selected.
- if the product classified as either a Dangerous Good or a Hazardous Good and if so, the class of dangerous good for transport purposes (Class 1 – Class 9), and
- a Safety Data Sheet (SDS).

#### *Safety Data Sheet (SDS)*

SDS are documents that provide critical information about hazardous chemicals. For example, they include information on:

- the chemical's identity and ingredients
- health and physical hazards
- safe handling and storage procedures
- emergency procedures
- disposal considerations.

SDS may be provided via a link to a website or as an attachment to the PIF.

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## 11. Packaging

Standard/Schedule Number	Standard Name/ Guidance
<b>ANZ Food Standards Code - 3.2.2</b>	Food Safety Practices and General Requirements

In this section questions will be asked about the packaging associated with the product.

If the product is not packaged, for example, it is delivered in bulk via a tanker, it is not required to complete this section of the PIF.

If the product is packaged, then this section will apply, and the information under sections 11.1 and 11.2 as applicable is requested.

### 11.1 Product Packaging

#### Packaging Stewardship

This section of the PIF relates to packaging stewardship.

Packaging stewardship can be described as an approach to managing the impacts of different products and materials. It acknowledges that those involved in producing, selling, using and disposing of products have a shared responsibility to ensure that those products or materials are managed in a way that reduces their impact, throughout their lifecycle, on the environment and on human health and safety.

In relation to packaging, the [Australian Packaging Covenant](#) (APC), is a cooperative arrangement between industry and Australian, state and territory governments that is underpinned by the *National Environment Protection (Used Packaging Materials) Measure 2011*. The Covenant operates to reduce the environmental impacts of consumer packaging, including plastics, paper, and cardboard, by changing the culture of businesses to design more sustainable packaging, increase recycling rates and reduce litter.

In this section of the PIF the following information is sought:

- Is your business a signatory to the Australian Packaging Covenant or other packaging stewardship program?
- If yes, have you met [Sustainable Packaging Guidelines](#) (SPG) reporting requirements?

#### Packaging Details

Packaging details for both the primary and secondary pack (if applicable):

- Method of Sealing – heat, sew or other
- Is the packaging tamper evident and if yes, describe the nature of the tamper evident feature?
- Colour - is packaging clear or coloured to assist with monitoring potential product contamination?
- Pack size – the weight or volume contained in the pack
- Dimensions (external) – primary and secondary pack
  - height, width, depth, weight, and name (jar, lid, box)

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## Packaging materials

In this section a list of packaging materials is requested. Such materials include:

- Metal – aluminium, steel, tinfoil
- Plastic – flexible, PE, PET, PP, HDPE, LDPE, PVDC, PS, PVC
- Paper – fibre board, corrugated board, multiwall
- Glass
- Textile

Whether the material(s) used in the packaging for this product is approved for direct food contact is also requested, and if so, the food contact approval agency.

This section also includes a question about the presence or absence of engineered nanoparticles.

## Description of packaging

Information regarding the packaging format – that is – can, bottle, box, form/fill/seal, or bag is requested including:

- Recycling coding number (refer to Table 2 for the Code numbers) or the Australasian Recycling Label (ARL) and
- Recycle content (%).

## 11.2 Pallet Configuration

If the product is delivered on a pallet the following information is requested

- Gross weight of loaded pallet (kg)
- Stack height of loaded pallet (cm)
- Specify the type of pallet (material) – wood, plastic, metal -steel or aluminium, cardboard or other
- What is the pallet pattern – column, row, brick, pinwheel or other
- Shippers per pallet
- Layers per pallet

Table 3: Recycling coding number and the Australasian Recycling Label (ARL)

Symbol	Type of plastic	Properties	Uses
 PET	Polyethylene Terephthalate (PET)	Clear, tough, solvent resistant plastic often used as a fibre.	Water and soft drink bottles, detergent bottles.
 HDPE	High Density Polyethylene (HDPE)	Very common plastic, usually white or coloured.	Milk and cream bottles, shampoo bottles, cleaning products.
 PVC	Polyvinyl Chloride (PVC)	Hard, rigid plastic may be clear.	Clear cordial and juice bottles.
 LDPE	Low Density Polyethylene (LDPE)	Soft, flexible plastic – waxy surface.	Bread bags, produce bags, bin liners, squeeze bottles
 PP	Polypropylene (PP)	Hard but still flexible plastic.	Ice cream containers and lids, plastic take away containers.
 PS	Polystyrene (PS)	Clear, glassy, rigid, brittle plastic.	Yoghurt and margarine containers
 OTHER	Expanded Polystyrene (EPS)	Foamed, light weight.	Drinking cups, meat trays, packing peanuts, foam boxes
<b>EPS</b>	Other	Includes all other plastics and soft plastics including acrylic and nylon.	

## 12. Specifications for Compliance

Standard/Schedule Number	Standard Name/ Guidance
<b>ANZ Food Standards Code - 1.1.1</b>	Structure of the Code and General Provisions
<b>FSC 1.6.1</b>	Microbiological Limits in Food

This section allows the supplier to include specific specification requirements in relation to the physical, organoleptic, chemical, and microbiological specifications.

### Certified laboratory testing

It is recommended that companies use laboratories that are certified for the test methods being employed and that the laboratory participates in regular proficiency testing to assess their performance in using the specified test method. In Australia, certification of laboratories is undertaken by NATA, Australia and laboratory reports should be issued carrying the official NATA certification stamp to demonstrate the laboratory is accredited for the method and results reported.

The following information is requested for each type of specification

#### *Test / Parameter*

Refers to a description of the test or parameter. Examples include viscosity, pH, salt, soluble solids, particle size, colour, appearance, yeasts & moulds.

#### *Specification*

Refers to an acceptable result for the test / parameter, which usually consists of ranges of values or upper and lower limits. Ensure that the unit of measure (e.g., %, mg, cfu/g) is included here where appropriate.

#### Test Method

Provision of test methods is recommended and must quote AOAC International (previously the Association of Official Agricultural Chemists) methods or recognised independent Australian or International standards. Where a supplier's internal test method is quoted a copy must be provided with the PIF.

Refer to AOAC methods and / or recognised Australian or International standards. Where a supplier quotes an internal test method this should be provided or provided on request.

#### *C of A or C of C*

Whether a Certificate of Analysis (C of A) or Certificate of Conformance (C of C) can be provided is asked, and if it can, how often?

“How often” refers to how often the C of A or C of C is provided – e.g. – with every delivery, with every batch, once a month or once a year.

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### 12.1 Organoleptic Specifications

Organoleptic specifications include information such as flavour, colour, aroma, and texture.

### 12.2 Physical Specifications

Physical specifications include information such as particle size, shape, specific gravity, and whether foreign object detection systems have been used to assess the product- e.g.: metal detector, sieves, magnets, filters.

### 12.3 Microbiological Specifications

Microbiological specifications include information such as standard plate count, yeasts & moulds, coliforms, *Salmonella* and *Listeria*.

Testing parameters for Microbial Specifications shall, as a minimum, include the relevant microbiological requirements specified in the ANZFS, and must ensure goods are safe and suitable as defined within relevant state and territory food acts.

Microbiological testing for the presence of pathogens or indicator organisms should be consistent with the risks of contamination associated with the product, and the management of those risks using a documented Hazard Analysis Critical Control Point (HACCP) program. Appropriate microbiological testing may be used to validate the effectiveness of the HACCP system.

Additional microbiological testing may also be provided to demonstrate the nature and substance of the product, or where appropriate in respect of product specification. For example, it may be appropriate to provide a yeast & mould count for fermented goods.

### 12.4 Chemical Specifications

Chemical specifications include information such as pesticide residue screen, antibiotic residue screen, heavy metal screen, aflatoxins screen, salt, acid, pH, moisture, brix, and water activity.

For example, pesticide residue screening may be required on certain ingredients of animal and vegetable origin, but not on ingredients that are mineral or chemical origin.

Chemical testing for purity and specificity of chemical or mineral substances may be undertaken where there are appropriate reference methods and may be set out as requirements of the terms of trade rather than a requirement of the Food Standards Code.

Chemical testing may also be appropriate where nutrition content and health claims are made, and verification of the claim depends on analytical testing.

## 13. Company Specific Requirements

This section of the PIF is optional and provides for companies to include any company specific information that is not provided elsewhere in the PIF. This might be information that is specific to products or processes.

The information is provided as text and can include attachments.

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## 14. Extra Comments and Attachments

This section of the PIF is optional for companies to include information not provided elsewhere in the PIF. This might be information that is specific to products or processes.

The information is provided as text and can include attachments.

## 15. Summary of Statements and Claims

The information in this section is generated automatically based on the information provided by the business in the preceding sections of the PIF.

**IMPORTANT:** This is a summary of product information provided in more detail in previous sections of this PIF™. This summary may not convey a complete understanding of the product.

The user should refer to each relevant section of the PIF™ for the complete information.

## 16. Checklist

The checklist is designed to ensure that the form has been completed correctly.

System Mandatory and recommended fields that have not been completed will be highlighted.

### When to re-issue a PIF

The PIF will need to be re-issued periodically as agreed with the customer and supplier as part of validation and verification requirements of relevant food safety plans. As a guide, this should be at least every two years, but may be annually for products that are likely to have changes to nutrition content due to seasonal variations. Otherwise, the PIF should be re-issued when there are substantial changes to specifications.

Products or ingredients that are subject to due to seasonal variations, such as increased availability of feed, may need to be revised and reissued if there are significant nutritional variations on a yearly basis.

Products or ingredients that required to be sourced from different suppliers due to environment impacts such as droughts or floods, may be subject to a change in allergen risks from different suppliers and need re-evaluation.

Changes that DO NOT substantially alter the nature, substance, or quality of the product, such as a more recent food safety audit or updated compliance certificates, do not warrant re-issuing the PIF unless there are specific requirements to do so in supplier contracts.

## Appendix 1 – Terms & Definitions

Definitions relevant to the Australia New Zealand Food Standards Code can be found in [Standard 1.1.2](#) – Definitions used throughout the Code

Term	Suggested Definition
<b>3PM</b>	Third party manufacturer – a company contracted by a supplier to manufacture a product on their behalf.
<b>Allergen</b>	A substance that can cause a hypersensitive immune response (allergic reaction) in some consumers. The reaction may potentially be life-threatening after exposure by ingestion, inhalation or contact with skin.
<b>AOAC International</b>	previously the Association of Official Agricultural Chemists
<b>Australia New Zealand Food Standards Code</b>	A list of regulatory requirements for food sold in Australia and New Zealand, administered by Food Standards Australia New Zealand.  The Code is given legal force through Commonwealth, state and territory and New Zealand food legislation and covers general food standards, specific food product standards and Australian food safety standards.
<b>Barcode</b>	A barcode is an optical, machine-readable, representation of data; the data usually describes something about the object that carries the barcode.
<b>Compound ingredient</b>	An ingredient of a food is a <b>compound ingredient</b> if it is itself made from two or more ingredients.
<b>Customer</b>	A party that purchases products from the Supplier.
<b>Cross contact allergen</b>	Cross contact allergens are those allergens that may be inadvertently incorporated into a product through various routes and where the occurrence of the allergen is sporadic, intermittent, and uncontrollable.
<b>Dangerous Goods</b>	Dangerous goods are materials or items with hazardous properties which, if not properly controlled, present a potential hazard to human health and safety, infrastructure and/or their means of transport. <sup>10</sup>
<b>Dangerous Good Class</b>	<b>Class 1</b> – explosives are materials or items which could rapidly conflagrate or detonate as a consequence of chemical reaction.

<sup>10</sup> <http://www.dgiglobal.com/classes>, accessed 18/08/2018

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Term	Suggested Definition
	<p><b>Class 2</b> – gases are substances which have a vapour pressure of 300 kPa or greater at 50°C or which are completely gaseous at 20°C at standard atmospheric pressure, and items containing these substances.</p> <p><b>Class 3</b> – flammable liquids are defined by dangerous goods regulations as liquids, mixtures of liquids or liquids containing solids in solution or suspension which give off a flammable vapour (have a flash point) at temperatures of not more than 60-65°C, liquids offered for transport at temperatures at or above their flash point or substances transported at elevated temperatures in a liquid state and which give off a flammable vapour at a temperature at or below the maximum transport temperature.</p> <p><b>Class 4</b> – flammable solids are materials which, under conditions encountered in transport, are readily combustible or may cause or contribute to fire through friction, self-reactive substances which are liable to undergo a strongly exothermic reaction or solid desensitized explosives.</p> <p><b>Class 5</b> – oxidizing substances are substances which may cause or contribute to combustion, generally by yielding oxygen as a result of a redox chemical reaction.</p> <p><b>Class 6</b> – toxic and infectious substances are those which are liable either to cause death or serious injury or to harm human health if swallowed, inhaled or by skin contact. Infectious substances are those which are known or can be reasonably expected to contain pathogens.</p> <p><b>Class 7</b> – radioactive material is any material containing radionuclides where both the activity concentration and the total activity exceeds certain pre-defined values.</p> <p><b>Class 8</b> – corrosives are substances which by chemical action degrade or disintegrate other materials upon contact.</p> <p><b>Class 9</b> – miscellaneous dangerous goods are substances and articles which during transport present a danger or hazard not covered by other classes. This class encompasses, but is not limited to, environmentally hazardous substances, substances that are transported at elevated temperatures, miscellaneous articles and substances,</p>

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Term	Suggested Definition
	genetically modified organisms and micro-organisms and (depending on the method of transport) magnetized materials and aviation regulated substances.
<b>FIF</b>	Facility Information Form
<b>Food</b>	Any substance, whether processed, semi-processed or raw, which is intended for human consumption, and includes drinks, chewing gum and any substance that has been used in the manufacture, preparation or treatment of “food” but does not include cosmetics or tobacco or substances used only as drugs.  <i>[SOURCE: Codex Alimentarius — General Standard for the Labelling of Prepackaged Food (CODEX STAN 1-1985)]</i>
<b>Food Additive</b>	Any substance not normally consumed as a <i>food</i> (3.1) by itself and not normally used as a typical <i>ingredient</i> (3.2) of food, whether or not it has nutritive value, the intentional addition of which to food for a technological (including organoleptic) purpose in the manufacture, processing, preparation, treatment, packing, packaging, transport or holding of such food results, may be reasonably expected to result (directly or indirectly) in it or its by-products becoming a component of or otherwise affecting the characteristics of such foods.  <i>[SOURCE: Codex Alimentarius — General Standard for the Labelling of Prepackaged Food (CODEX STAN 1-1985)]</i>
<b>GTIN</b>	Global trade item number
<b>Ingredient</b>	Any substance, including a <i>food additive</i> (3.3), used in the manufacture or preparation of a <i>food</i> (3.1) and present in the final product although possibly in a modified form.  <i>[SOURCE: Codex Alimentarius — General Standard for the Labelling of Prepackaged Food (CODEX STAN 1-1985)]</i>
<b>Product name</b>	The name or description by which the supplier refers to this specific product. This is the name or description assigned and referenced by the supplier of this specific product.
<b>RSPO</b>	Roundtable on Sustainable Palm Oil
<b>Shipper</b>	The shipper is the outer packaging in which the product is transported to the customer.
<b>Supplier</b>	The supplier is the company completing the document.



Term	Suggested Definition
<b>Traceability</b>	Means the ability to follow the movement of a food through specified stage(s) of production, processing, and distribution. <sup>11</sup>
<b>VITAL</b>	A standardized allergen risk assessment tool developed by the Allergen Bureau for use by food producers. VITAL allows food producers to assess the impact of allergen cross contact and provides information on appropriate precautionary allergen labelling to be applied to products.

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<sup>11</sup> Definition taken from ISO 22005

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## Appendix 2 - PIF v5 Changes

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.

The diagrams on the following page show a comparison of PIF v5 to PIF V6.0. Sections in **blue type** are new or substantially changed from PIF v5. Sections in **purple type** have been split out from Section 6 of PIF v5 into their own sections.

### Supplier Warranty

***The supplier declaration and warranty has been removed from PIF V6.0.***

The supplier declaration and warranty has not been included in PIF V6.0 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 if 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.

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## 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

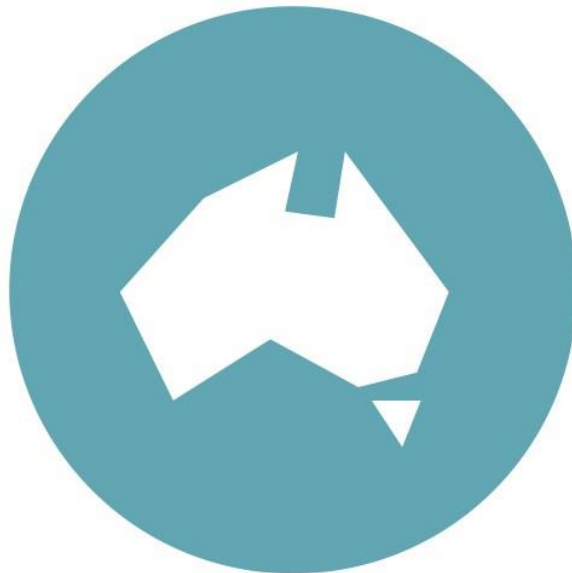
## Appendix 3 – References and Resources

Topic	Resource or Reference Name	Link
<b>Food Regulation – ANZ</b>		
	Australia New Zealand Food Standards Code	<a href="https://www.foodstandards.gov.au/code/Pages/default.aspx">https://www.foodstandards.gov.au/code/Pages/default.aspx</a>
	FSANZ Nutrition Panel Calculator (NPC)	<a href="http://www.foodstandards.gov.au/industry/npc/Pages/Nutrition-Panel-Calculator-introduction.aspx">http://www.foodstandards.gov.au/industry/npc/Pages/Nutrition-Panel-Calculator-introduction.aspx</a>
	State & Territory Food Acts & Regulations	
<b>Country of Origin labelling (CoOL)</b>	Country of Origin food labelling – a guide for business (ACCC)	<a href="https://www.accc.gov.au/publications/country-of-origin-food-labelling">https://www.accc.gov.au/publications/country-of-origin-food-labelling</a>
<b>Trade Measurement (Weight Marking)</b>	National Trade Measurement Regulations 2009	<a href="https://www.legislation.gov.au/Series/F2009L03479">https://www.legislation.gov.au/Series/F2009L03479</a>
	National Measurement Act 1960	<a href="https://www.legislation.gov.au/Series/C1960A00064">https://www.legislation.gov.au/Series/C1960A00064</a>
<b>Food Regulation – Import</b>	Imported Food Control Act 1992	<a href="https://www.legislation.gov.au/Series/C2004A04512">https://www.legislation.gov.au/Series/C2004A04512</a>
	Imported Food Control Regulations 2019	<a href="https://www.legislation.gov.au/Series/F2019L01006">https://www.legislation.gov.au/Series/F2019L01006</a>
	Biosecurity Act 2015	<a href="https://www.legislation.gov.au/Series/C2015A00061">https://www.legislation.gov.au/Series/C2015A00061</a>
<b>Food Regulation – Export</b>	Export Control Act 2020	<a href="https://www.legislation.gov.au/Series/C2020A00012">https://www.legislation.gov.au/Series/C2020A00012</a>
	The Export Control Rules 2021	Note – there are a number of these for different product categories.
<b>Food Regulation Agencies - ANZ</b>	Food Standards Australia New Zealand	<a href="http://www.foodstandards.gov.au/Pages/default.aspx">http://www.foodstandards.gov.au/Pages/default.aspx</a>
	NZ Ministry for Primary Industries (MPI)	<a href="https://www.mpi.govt.nz/">https://www.mpi.govt.nz/</a>
	Australian Competition and Consumer Commission (ACCC)	<a href="http://www.accc.gov.au">www.accc.gov.au</a>
	NZ Commerce Commission	<a href="https://comcom.govt.nz/">https://comcom.govt.nz/</a>
	National Measurement Institute (NMI)	<a href="https://www.measurement.gov.au/Pages/default.aspx">https://www.measurement.gov.au/Pages/default.aspx</a>
	NSW Food Authority	<a href="http://www.foodauthority.nsw.gov.au/aboutus">http://www.foodauthority.nsw.gov.au/aboutus</a>

Topic	Resource or Reference Name	Link
	Primesafe	<a href="https://www.primesafe.vic.gov.au/">https://www.primesafe.vic.gov.au/</a>
	Dairy Food Safety Victoria	<a href="https://www.dairysafe.vic.gov.au/">https://www.dairysafe.vic.gov.au/</a>
	Vic Health	<a href="https://www2.health.vic.gov.au/public-health/food-safety">https://www2.health.vic.gov.au/public-health/food-safety</a>
	Qld Health	<a href="https://www.health.qld.gov.au/public-health/industry-environment/food-safety">https://www.health.qld.gov.au/public-health/industry-environment/food-safety</a>
	Safe Food Queensland	<a href="https://www.safefood.qld.gov.au">https://www.safefood.qld.gov.au</a>
	SA	<a href="https://www.sahealth.sa.gov.au/wps/wcm/connect/public+content/sa+health+internet">https://www.sahealth.sa.gov.au/wps/wcm/connect/public+content/sa+health+internet</a>
	WA	<a href="https://www2.health.wa.gov.au/Health-for/Licensing-and-industry/Food">https://www2.health.wa.gov.au/Health-for/Licensing-and-industry/Food</a>
	NT	<a href="https://nt.gov.au/industry/hospitality/food-safety-and-regulations/food-safety-standards">https://nt.gov.au/industry/hospitality/food-safety-and-regulations/food-safety-standards</a>
	TAS	<a href="http://www.dhhs.tas.gov.au/home">http://www.dhhs.tas.gov.au/home</a>
	ACT	<a href="http://www.health.act.gov.au/public-information/businesses/food-safety-regulation">http://www.health.act.gov.au/public-information/businesses/food-safety-regulation</a>
<b>Food Regulation - claims</b>	Australian Competition and Consumer Commission (ACCC) Advertising and Selling Guide	<a href="https://www.accc.gov.au/about-us/publications/advertising-and-selling-guide">https://www.accc.gov.au/about-us/publications/advertising-and-selling-guide</a>
	NZ Commerce Commission Making Accurate Claims	<a href="https://comcom.govt.nz/business/dealing-with-typical-situations/making-accurate-claims">https://comcom.govt.nz/business/dealing-with-typical-situations/making-accurate-claims</a>
<b>Food Regulation - International</b>	Codex Alimentarius (International Food Standards)	<a href="http://www.fao.org/fao-who-codexalimentarius/en/">http://www.fao.org/fao-who-codexalimentarius/en/</a>
	European Food Safety Authority (EFSA)	<a href="http://www.efsa.europa.eu/">http://www.efsa.europa.eu/</a>
	United States Food and Drug Administration (USFDA)	<a href="https://www.fda.gov/">https://www.fda.gov/</a>
<b>Allergen Management</b>		
	Allergen Bureau	<a href="http://allergenbureau.net/">http://allergenbureau.net/</a>
	National Allergy Strategy	<a href="https://www.nationalallergystrategy.org.au/">https://www.nationalallergystrategy.org.au/</a>

Topic	Resource or Reference Name	Link
	Food Allergen Portal	<a href="http://www.foodstandards.gov.au/consumer/foodallergies/foodallergenportal/Pages/default.aspx">http://www.foodstandards.gov.au/consumer/foodallergies/foodallergenportal/Pages/default.aspx</a>
	International Allergens	<a href="https://farrp.unl.edu/IRChart">https://farrp.unl.edu/IRChart</a>
	Food Industry Guide to Allergen Management and Labelling	<a href="https://www.afgc.org.au/download/food-industry-guide-to-allergen-management-and-labelling-april-2021?wpdmdl=21535&amp;masterkey=607f83326ebe4">https://www.afgc.org.au/download/food-industry-guide-to-allergen-management-and-labelling-april-2021?wpdmdl=21535&amp;masterkey=607f83326ebe4</a>
	Food Industry Guide to the Voluntary Incidental Trace Allergen Labelling (VITAL®) Program V2.0	<a href="http://allergenbureau.net/vital/">http://allergenbureau.net/vital/</a>
	VITAL® Best Practice Labelling Guide for Australia and New Zealand	<a href="http://allergenbureau.net/vital/">http://allergenbureau.net/vital/</a>
	Unexpected Allergens in Foods	<a href="https://allergenbureau.net/unexpected-allergens-in-food-updated-guidance-available-now/">https://allergenbureau.net/unexpected-allergens-in-food-updated-guidance-available-now/</a>
<b>Food Importation - Australia</b>	BICON	<a href="https://bicon.agriculture.gov.au/BiconWeb4.0">https://bicon.agriculture.gov.au/BiconWeb4.0</a>
	Department of Agriculture, Fisheries and Forestry	<a href="http://www.agriculture.gov.au/import">http://www.agriculture.gov.au/import</a>
<b>Food Importation – New Zealand</b>	Ministry for Primary Industries	<a href="https://www.mpi.govt.nz/importing/overview/food-imports/">https://www.mpi.govt.nz/importing/overview/food-imports/</a>
<b>Nutrition and Health</b>		
<b>Organisations</b>	National Health and Medical Research Council (NHMRC)	<a href="https://www.nhmrc.gov.au/">https://www.nhmrc.gov.au/</a>
<b>Dietary Recommendations</b>	Recommended Dietary Intakes for Use in Australia	<a href="https://nutritionaustralia.org/fact-sheets/adgs-recommended-daily-intakes/">https://nutritionaustralia.org/fact-sheets/adgs-recommended-daily-intakes/</a>
<b>Schemes</b>	Daily Intake Guide	<a href="http://www.mydailyintake.net/">http://www.mydailyintake.net/</a>
	Health Star Rating Scheme	<a href="http://healthstarrating.gov.au/internet/healthstarrating/publishing.nsf/content/home">http://healthstarrating.gov.au/internet/healthstarrating/publishing.nsf/content/home</a>
<b>Food Recall</b>		
	Food Standards Australia New Zealand	<a href="http://www.foodstandards.gov.au/industry/foodrecalls/Pages/default.aspx">http://www.foodstandards.gov.au/industry/foodrecalls/Pages/default.aspx</a>

Topic	Resource or Reference Name	Link
	MPI	<a href="https://www.mpi.govt.nz/food-safety-home/food-recalls-and-complaints/">https://www.mpi.govt.nz/food-safety-home/food-recalls-and-complaints/</a>
<b>Guidance Documents</b>		
<b>Codex</b>	Guidelines	<a href="http://www.fao.org/fao-who-codexalimentarius/codex-texts/guidelines/en/">http://www.fao.org/fao-who-codexalimentarius/codex-texts/guidelines/en/</a>
	Guidelines for the use of flavourings	
<b>Health Claims</b>	Getting Your Claims Right – A guide to complying with the Nutrition, Health, and Related Claims Standard of the ANZ Food Standards Code	<a href="http://www.foodstandards.gov.au/publications/Pages/gettingyourclaimsright.aspx">http://www.foodstandards.gov.au/publications/Pages/gettingyourclaimsright.aspx</a>
<b>Health Star Ratings</b>	Guide for Industry to the Health Star Rating Calculator (HSRC)	<a href="http://healthstarrating.gov.au/internet/healthstarrating/publishing.nsf/Content/guide-for-industry">http://healthstarrating.gov.au/internet/healthstarrating/publishing.nsf/Content/guide-for-industry</a>
<b>AFGC</b>	AFGC Date Marking Guide	<a href="https://www.afgc.org.au/industry-resources/food-labelling-and-allergen-guide">https://www.afgc.org.au/industry-resources/food-labelling-and-allergen-guide</a>
<b>NMI</b>	National Measurement Institute (NMI) - What is Trade Measurement?	<a href="https://www.measurement.gov.au/Publications/trademeasurement/Documents/What-is-Trade-Measurement.pdf">https://www.measurement.gov.au/Publications/trademeasurement/Documents/What-is-Trade-Measurement.pdf</a>
	National Measurement Institute (NMI) Guide to the Sale of Pre-packaged Goods	<a href="https://measurement.gov.au/Industry/business/Pages/Pre-packedGoods.aspx">https://measurement.gov.au/Industry/business/Pages/Pre-packedGoods.aspx</a>
<b>Dangerous Goods</b>	Safe Work Australia	<a href="https://www.safeworkaustralia.gov.au/">https://www.safeworkaustralia.gov.au/</a>
<b>Dangerous Goods Classes</b>		<a href="https://dglobal.com/classes/">https://dglobal.com/classes/</a>
<b>AOAC International</b>		<a href="https://www.aoac.org">https://www.aoac.org</a>
<b>Packaging</b>		
<b>Packaging Stewardship</b>		
	Australian Packaging Covenant Organisation (APCO)	<a href="https://www.packagingcovenant.org.au/">https://www.packagingcovenant.org.au/</a>
	The Sustainable Packaging Guidelines (SPGs)	<a href="https://apco.org.au/sustainable-packaging-guidelines">https://apco.org.au/sustainable-packaging-guidelines</a>



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