Australian Branded Food Database

Information for Data Suppliers - Data security, use and privacy

What data will FSANZ get from GS1?

- Data to be collected from manufacturers by GS1 and provided to Food Standards Australia New Zealand (FSANZ) will include a range of on-pack information including Global Trade Item Number (GTIN), manufacturer, brand and food name, nutrition information panel, listed ingredients, pack and serve size, and if displayed, health star rating (HSR), allergen statement, and nutrient and health claim information. Where relevant, it will also include off-pack information relating to HSR including HSR category, total dietary fibre and fruit, vegetable, nut and legume (FVNL) content.

- For manufacturers who are existing users of the National Product Catalogue, GS1 will also provide FSANZ product data that is already supplied by manufacturers to retailers. This may include packaging type and product dimensions and weight.

How will FSANZ get the data?

- Data provided by manufacturers by either the GS1 National Product Catalogue or the FSANZ portal will be securely transferred to FSANZ via a GS1 Application Program Interface (API).

Where will data I provide be stored by FSANZ?

- FSANZ is developing automated systems to pull branded food data from GS1 via the API, into a secure FSANZ database where the data can be validated, transformed, and loaded directly into FSANZ's existing food composition data management system, Silo.

What will happen to my data in the Silo food composition database?

- FSANZ is enhancing its Silo food composition data management system so that it can store data, perform a range of system validations and transformations, and report on the data to support FSANZ and broader public health activities. This could include such things as:
    - assigning foods different classification systems
    - calculating nutrient information on a per serve basis
    - linking data to existing FSANZ food composition data or other datasets
    - correcting minor errors (for example, obvious 'typos')
    - adding timestamps
    - applying database rules relating to use of rounding conventions, missing values, 'not detected' or 'less than' values for nutrient values to facilitate analysis and reporting
    - developing reports to extract data from Silo .

- Following system validation and transformation, data will undergo review and approval by FSANZ staff with food composition expertise, prior to use or publication.

What happens if there is a problem with my data?

- If any issues or inconsistencies are identified in relation to data provided by manufacturers, FSANZ will notify GS1. GS1 will use existing procedures to follow-up with manufacturers in relation to the identified issue, and help them update their branded food information.

- Data will not be used or published by FSANZ until any identified issues or inconsistencies have been resolved.

- GS1 is available to assist all manufacturers to provide and maintain their branded food data.

- As owners of the data provided to the BFD, manufacturers are responsible for ensuring it is accurate and up-to-date.

What if there is a discrepancy between the branded food data found on the product on the shelf and in the BFD?

- GS1 will work with manufacturers to determine the reasons for these discrepancies. In some cases, there may be legitimate reasons why branded food data published in the BFD differs from product label information t on the shelf. These could include:
    - Stock-in-trade – where BFD information has been updated as a result of product/label changes, but older stock is still available in stores
    - Production systems – where minor differences may occur due to, for example, seasonal variation, ingredient supply or production facility location.

What systems does FSANZ have in place to make sure my data is secure?

- FSANZ is fully compliant with Australian Information and Communication Technology (ICT) security requirements set by both the Federal Government and the Department of Health. FSANZ also complies with requirements from the Australian Cyber Security Centre which is part of the Australian Signals Directorate to ensure our data and information is protected.

- The Silo food composition data management system also has inbuilt access and security systems to control who can access, view, amend and publish data.

Who will be able to access the branded food data held by FSANZ?

- Data provided by manufacturers will be securely held in the Silo food composition data management system. Access to this database is limited to selected FSANZ scientific staff and FSANZ ICT administrators only. No other individuals or organisations (including other government departments) have access to Silo.

- ICT consultants engaged by FSANZ to work on Silo must comply with strict confidentiality requirements.

- In future, the BFD will be supported by a public website to allow any member of public to search and access a subset of the product data. However, not all data provided to FSANZ will be made publicly available (further information below).

What data will FSANZ publish on the BFD public website ?

- The **minimum product data** that will be published on the BFD public website includes:
  - Global Trade Item Number (GTIN)
  - Product identification such as brand owner and brand names
  - Nutrition information panel information and listed ingredients
  - Pack and serve size
  - If displayed, health star rating.

- Where permission has been provided, FSANZ will also publish off-label information relating to HSR category, FVNL and fibre content.

- While FSANZ is asking manufacturers to provide allergen information, allergen declarations will not be published on the BFD public website.

- FSANZ will consult with manufacturers and other stakeholders regarding the publication of other data, such as claims and country of origin information.

- The BFD public website will include terms and conditions of use consistent with those provided in existing FSANZ published food composition datasets. FSANZ will ensure use of appropriate disclaimers and advice to consumers to always refer to information on the product on the shelf when making their purchasing decisions.

Can the branded food data I provide be kept confidential?

- FSANZ encourages manufacturers to provide their data without restriction. However, we understand that manufacturers may not want certain information made publicly available. As the owners of their information, data suppliers can choose how their data is used.

- If requested, FSANZ will agree to keep some or all data provided for in-house use only, for example to inform standards development work and support public health initiatives, and will not publish this data on the BFD public website.

- When providing data, manufacturers' preference on how their data can be used will be flagged. This preference will apply to all products provided by the manufacturer, as follows:

  ☐ **Level 0 – No restrictions:** No restrictions on publishing any product data on the public website
  ☐ **Level 1 – Minimum data set:** Publish the minimum product data (as identified above), **including** FVNL & Fibre
  ☐ **Level 2 – Exclude FVNL & fibre:** Publish the minimum product data, **excluding** FVNL & Fibre**)**
  ☐ **Level 3 – Private:** Exclude all product data from the public website**.**

- Manufacturers will have the ability to update their preference by communicating with GS1.

- Automated system functionality will ensure that product data flagged as private will not be published on the BFD public website.

How will FSANZ use the data I have provided but do not want made public?

- All data provided may be used by FSANZ for data analysis and reporting. Automated system functionality will ensure that only de-identified and/or aggregated data (if flagged as private) is published in FSANZ reports.

What if FSANZ receives a freedom of information (FoI) request?

- A person may seek information held by FSANZ by making an application under the Freedom of Information Act 1982 (Cth) (FOI Act). This includes BFD data provided to and held by FSANZ. When an application is made, FSANZ is required to release that information unless an exemption under the FOI Act applies.

- Information may be exempted from disclosure under section 47 of the FOI Act because it is a trade secret or commercially valuable. The information may also be conditionally exempted under section 47G of the FOI Act because it discloses business, commercial or financial information and release would unreasonably impact the entity. The FOI Act also contains an exemption where release would be found an action for breach of confidence.

- Information that is confidential BFD data may fall within one or more of these exceptions.

- FSANZ will follow the processes in the FOI Act to consult with the entity that provided the information, allowing that entity to make submissions before FSANZ makes a decision whether or not to release it.