

# 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 GS1 will include a range of on-pack information, and where relevant, a number of off-pack attributes. For those that choose to participate there is a required (mandatory) dataset. There are also a number of optional data attributes that if available and provided would also be valuable to FSANZ.

Mandatory data	Optional data
<ul style="list-style-type: none"> <li>• Global Trade Item Number (GTIN)</li> <li>• Brand owner, brand name and product name</li> <li>• Pack size, serve size and servings per pack</li> <li>• Form of food (as sold, prepared with water etc.)</li> <li>• Nutrition information panel (NIP)               <ul style="list-style-type: none"> <li>○ 7 mandatory nutrients</li> <li>○ Dietary fibre</li> </ul> </li> <li>• Ingredient statement</li> <li>• Health Star Rating category</li> <li>• If displayed, Health Star Rating</li> <li>• Fruit, vegetable, nut &amp; legume (FVNL) content and concentrated fruit &amp; vegetable content (%)</li> </ul>	<ul style="list-style-type: none"> <li>• Added sugars (g)</li> <li>• Wholegrain content (%)</li> <li>• Allergen declaration statement/s</li> <li>• Nutrition content and/or health claim/s</li> <li>• Non-mandatory NIP values</li> <li>• Product images</li> </ul>

For GS1 members, FSANZ may also receive additional product data provided to retailers such as packaging type.

### How will the data be transferred to FSANZ?

All data provided will be securely transferred to FSANZ via a GS1 Application Program Interface (API).

### Where will FSANZ store the data provided?

All branded food data transferred from GS1 via the API, will be validated, transformed, and loaded directly into FSANZ's existing secure food composition data management system, Silo.

### What will FSANZ do with my data in the Silo database?

Silo will allow FSANZ to store, validate, transform, and report on branded food data.

Silo may be used to:

- assign foods to classification systems for reporting purposes
- calculate nutrient information on a per serve basis
- link data to other FSANZ food composition datasets
- correct minor errors (for example, obvious 'typos')
- add timestamps
- apply database rules to manage rounding conventions, missing values, 'not detected' or 'less than' values to better facilitate analysis and reporting
- extract data via reports.

### **What happens if there is a problem with my data?**

FSANZ will notify GS1 of any issues or inconsistencies with the data provided.

GS1 will use existing procedures to follow-up with companies 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.

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 companies to determine the reasons for these discrepancies.

Where the discrepancy is due to stock-in-trade or differences due to seasonal variation, ingredient supply or production facility location, the existing value in the BFD will be retained.

Where an error has been identified, GS1 will work with the company to provide an updated value to feed into the BFD.

### **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 and Aged Care. 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 companies 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, a subset of data from the BFD will be made publicly available, subject to permission (further information below).

### **What data will FSANZ publish on the BFD public website?**

The **minimum published dataset** (minimum dataset) includes:

- Global Trade Item Number (GTIN)
- Brand owner, brand name, product name
- Pack and serve size
- Nutrition information panel
- Ingredient statement
- If displayed, health star rating.

With permission, 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.

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 companies to provide their data without restriction. However, as the owners of the data, companies can choose how their data is used.

When providing data, companies will flag how their data can be used by FSANZ. This preference will apply to all products provided by the manufacturer, as follows:

Privacy options for the public release of branded food data			
Level 0	Level 1	Level 2	Level 3
No restrictions	Minimum data set PLUS	Minimum data set	Private
<b>No restrictions</b> on publishing any product data on the public website	Publish minimum product data <b>and FVNL &amp; fibre</b>	Publish minimum product data only ( <b>excludes</b> FVNL & fibre)	<b>Exclude all product data</b> from the public website

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 to support standards development work and public health initiatives. Automated system functionality will ensure that only de-identified and/or aggregated data (if flagged as private) is published in FSANZ reports.

Product data flagged as private will not be published on the BFD public website.

### 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.