



# BEST PRACTICES

## DELIVERING REGULATORY CONTENT IN PIES GUIDELINES

REVISION 1 | REVISED 5/22/2018



## Best Practices - Delivering Regulatory Content in PIES Guidelines



Revision Number	Release Date	Notes
0.1	5/14/2018	First draft of Delivering Regulatory Content Best Practices Guideline
1	5/22/2018	Version 1.0 of Delivering Regulatory Content Best Practices Guideline released

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## Introduction

The goal of this best practices document is to inform, assist and provide recommendations on transmission and display of Regulatory online content for Auto Care Association (ACA) members.

For the purposes of this document suppliers and receivers reference the following:

- Suppliers – manufacturers, suppliers, distributors, and 3rd party software providers
- Receivers – retailers, wholesalers, distributors, internet mail order stores, marketplaces and 3rd party electronic catalog companies

The scope of this document is focused solely on the process to deliver and process regulatory information for online display purposes.

Regulatory content must be delivered in a consistent location and format within the PIES product information exchange file. This is intended to facilitate the implementation of the Suppliers content by the Receivers through the standardization of content and delivery.

This document reflects the most current information that is available as of the date of the document.

This document should be updated whenever changes or corrections are discovered:

- Contents and/or format of information to be delivered or displayed
- New guidelines
- Expansion of the application of regulatory content to other states/regions

These are simply guidelines and are not to be considered officially legal or enforceable procedures.

Please consult your legal department or advisors for official clarifications for your specific business.

## Regulatory Content Best Practices

### California Prop 65

Businesses should refer to official California Proposition 65 sites and sources for information and updates regarding this regulation. It is the Supplier's responsibility to be the source for this information by conducting their own research and due diligence to determine whether their products fall under Prop 65 regulations. It is the Supplier's responsibility to inform Receivers and provide data for Prop 65 labeling and online display. If a Supplier determines their products do not require any Prop 65 labeling or information, the Supplier should advise their Receivers accordingly.

Suppliers should take the following actions:

- Put a label on their products that qualify
- Send an image of that label as a Prop 65 image (use PIES asset segment)
- Send the text Prop 65 warning as an attribute (use PIES attribute segment)

Receivers should take the following actions:

- Remind suppliers if their products require a Prop 65 warning to please provide the data
- Create process to receive and publish image and text for Prop 65 online content

Receivers, including distributors, retailers, marketplaces and 3rd party providers, should accept and display any Prop 65 information from Suppliers without altering the labeling or text that is provided. It is recommended that online content should be displayed as part of the product results display, the product detail page, and as part of the checkout process.

For further information refer to Appendix A Prop 65 Regulatory websites.

## PIES Digital Asset Segment Recommendation

The PIES Digital Asset File Information Segment is used to relay information about many different media types which support the Item Part Number. The “Asset Type” field is used to identify what type of digital asset is being defined.

The Regulatory Label Asset Type code (RGL) will be utilized in Field P10 in the PIES product information delivery file

Send the Regulatory Label as an image

- Utilize the agreed upon image format between Supplier and Receiver
- Based on the Digital Assets Best Practices, TIFF is preferred, but JPG is also acceptable

Identify the image as a Regulatory Label by utilizing the “RGL” Asset Type included in the Digital Asset segment codes

Improvements to PIES 7.0 now allows the addition of new codes to the standard without waiting for the next version of PIES to be released.

- RGL Digital Asset Type Code will be added for PIES 7.0
- Previous releases of PIES could be applied if needed with proper communication between supplier and receiver

### XML Example – PIES 7.0 Digital Assets segment

```
<DigitalAssets>
<DigitalFileInformation MaintenanceType="A" AssetID="prop65_cancer" LanguageCode="EN">
  <FileName>prop65_cancer.jpg</FileName>
  <AssetType>RGL</AssetType>
  <FileType>JPG</FileType>
  <URI>CA/prop65/prop65_cancer.jpg</URI>
</AssetDescriptions>
  <Description MaintenanceType="A" DescriptionCode="CAP" LanguageCode="EN">
    Warning: This product contains a chemical known to the State of California to cause
    cancer.
```

```
</Description>
</AssetDescriptions>
<AssetDates>
  <AssetDate assetDateType="EFF">2018-07-16</AssetDate>
</AssetDates>
</DigitalFileInformation>
</DigitalAssets>
```

## XML Example – PIES 6.7 and Prior Digital Assets segment

```
<DigitalAssets>
  <DigitalFileInformation MaintenanceType="A" AssetID="prop65_cancer" LanguageCode="EN">
    <FileName>prop65_cancer.jpg</FileName>
    <AssetType>ZZ1</AssetType>
    <FileType>JPG</FileType>
    <URI>CA/prop65/prop65_cancer.jpg</URI>
  </DigitalFileInformation>
</DigitalAssets>
```

## PIES Attribute Segment Recommendation

The PIES Attribute segment allows the sender of a PIES file to express either industry-defined attributes from the Product Attribute Database (PAdb), or user-defined attributes about an Item Part Number.

The “AttributeID” attribute of “Attribute Data” (<ProductAttribute>) is either a user-defined attribute label, or you may use the Part Attribute ID (PAID) coded-value contained within the PAdb for the relevant Part Terminology. When the PAdb is not being used to convey attributes, the sender of the data defines the attribute label, and uses an Alphanumeric field of 2000 characters to send the attribute value.

We recommend sending Regulatory text utilizing the Attribute segment of the PIES product information delivery file

- Field F07 PADB Attribute should be flagged “N”
- Field F05 Attribute ID (Type) should contain an agreed upon attribute label identifying the text in Field F10 Attribute Data as regulatory text (California Proposition 65 is utilized in the example below)
- Field F10Attribute Data should contain the supplier researched Regulatory text the aligns with the Attribute ID (Type) specified
- California Prop 65 Regulatory text must begin with “WARNING:”
- In the example below, Field F10 the Attribute Data text contain the following content:
  - WARNING: This product contains a chemical known to the State of California to cause cancer.
  - WARNING: This product contains a chemical known to the State of California to cause birth defects or other reproductive harm.

F	G	H	I
F05	F07	F08	F10
Attribute ID (Type)	PADB Attribute	Attribute UOM	Attribute Data
California Proposition 65	N		WARNING: This product contains a chemical known to the State of California to cause cancer.
California Proposition 65	N		WARNING: This product contains a chemical known to the State of California to cause birth defects or other reproductive harm.



## XML Example – PIES Attribute segment

<ProductAttributes>

<ProductAttribute MaintenanceType="A" AttributeID="California Proposition 65"  
PADBAttribute="N" RecordNumber="1">

Warning: This product contains a chemical known to the State of California to cause cancer.

</ProductAttribute>

</ProductAttributes>

## Regulatory Content Delivery Best Practices

Trading partners should utilize their existing environments for sending and receiving product data.

- This includes Development, Test, QA, and Production environments.

Target destinations are based upon the supplier's trading partner agreements and their existing processes to deliver product information to their respective receivers.

PIES created a standardized form and format for the presentation of all critical product attribute data. However, beyond a data structure, PIES also created a methodology for industry-wide synchronization of product information.

We recommend trading partners utilize PIES 7.0 specifications and formats unless otherwise directed.

- RGL Digital Asset Type Code will be added for PIES 7.0

Ref #	Segment	Field Name	Code	Code Description	Code Format	Reference Requirements(note)	Source
P10	ASST	Asset Type	RGL	Regulatory Label	ID3	Regulatory Label indicates the image is intended to comply with a state or federal regulation i.e California Prop 65	PIES

PIES 7.0 documentation is available at the following location in Communifire:

<https://autocare.communifire.com/Spaces/Files/Auto Care Technology/PIES/PIES 7.0>

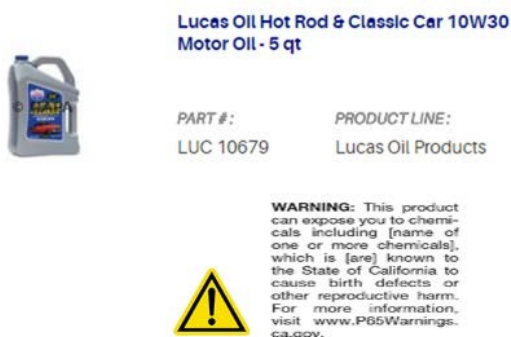
## Regulatory Content Label and Text Display Best Practices

### California Prop 65

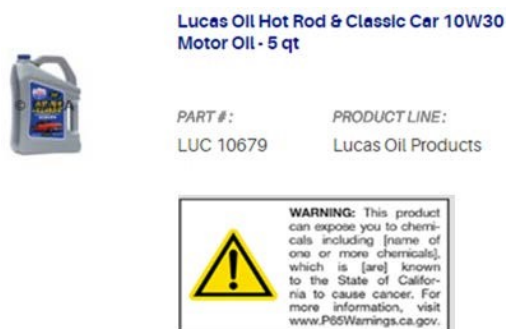
The content to be displayed with the product information includes the yellow warning triangle as well as the word “WARNING” in the body of the text.

The Receiver has several options to display the actual Supplier warning information:

- Use the triangle/warning as a hyperlink to display the information include a label image and/or text provided by the manufacturer



- Include the label image and/or text provided by the manufacturer as part of the display



## Appendix A – Regulatory Websites

### California Prop 65

Receivers, including distributors, retailers, marketplaces and 3rd party providers, should accept any Prop 65 information from Suppliers and display accordingly without altering the labeling or text that is provided.

Receivers should display Prop 65 information online as part of the product results display, the product detail page, and as part of the checkout process.





[www.p65warnings.ca.gov](http://www.p65warnings.ca.gov)

<https://oehha.ca.gov/files/proposition-65/side-sidearticle6pdf>

## Appendix B – SEMA Warning Label Examples

SEMA has provided examples of labels to use as guidelines. These labels can be used on products as well as for online purposes. <https://www.sema.org/prop65>

**Examples of Acceptable Warning Labels  
Under the New Regulations**

<p style="text-align: center;"><b>Cancer</b></p> <div style="border: 1px solid black; padding: 10px;">  <p><b>WARNING:</b> This product can expose you to chemicals including [name of one or more chemicals], which is [are] known to the State of California to cause cancer. For more information, visit <a href="http://www.P65Warnings.ca.gov">www.P65Warnings.ca.gov</a>.</p> </div>	<p style="text-align: center;"><b>Combined Cancer/Birth Defect</b></p> <div style="border: 1px solid black; padding: 10px;">  <p><b>WARNING:</b> This product can expose you to chemicals including [name of one or more chemicals], which is [are] known to the State of California to cause cancer or birth defects or other reproductive harm. For more information, visit <a href="http://www.P65Warnings.ca.gov">www.P65Warnings.ca.gov</a>.</p> </div>
<p style="text-align: center;"><b>Birth Defect</b></p> <div style="border: 1px solid black; padding: 10px;">  <p><b>WARNING:</b> This product can expose you to chemicals including [name of one or more chemicals], which is [are] known to the State of California to cause birth defects or other reproductive harm. For more information, visit <a href="http://www.P65Warnings.ca.gov">www.P65Warnings.ca.gov</a>.</p> </div>	<p style="text-align: center;"><b>Truncated on Product Warning</b></p> <div style="border: 1px solid black; padding: 10px;">  <p><b>WARNING:</b> Cancer and Reproductive Harm—<a href="http://www.P65Warnings.ca.gov">www.P65Warnings.ca.gov</a></p> </div>

**Type Size:** The warning text must be the same size as other consumer information presented on the package and may not be smaller than 6-point type.