

# Citizen Participation and Public Petitions Committee

17th Meeting, 2023 (Session 6), Wednesday  
22 November 2023

## PE1997: Introduce mandatory braille labelling for food products sold in Scotland

<b>Lodged on</b>	1 February 2023
<b>Petitioner</b>	Fiona McDonald on behalf of Sight Scotland and Sight Scotland Veterans
<b>Petition summary</b>	Calling on the Scottish Parliament to urge the Scottish Government to introduce new legal requirements on retailers to provide braille labelling on food products detailing the name of the item, and the item's use by or sell by date.
<b>Webpage</b>	<a href="https://petitions.parliament.scot/petitions/PE1997">https://petitions.parliament.scot/petitions/PE1997</a>

### Introduction

1. The Committee last considered this petition at its meeting on [22 March 2023](#). At that meeting, the Committee agreed to write to Food Standards Scotland, the Food and Drink Federation, and the Scottish Government.
2. The petition summary is included in **Annexe A** and the Official Report of the Committee's last consideration of this petition is at **Annexe B**.
3. The Committee has received new responses from Food Standards Scotland, the Food and Drink Federation Scotland, as well as two submissions from the Petitioner, which are set out in **Annexe C**. Members should note that Food Standards Scotland also responded on behalf of the Scottish Government.
4. Written submissions received prior to the Committee's last consideration can be found on the [petition's webpage](#).
5. Further background information about this petition can be found in the [SPICe briefing](#) for this petition.

6. The Scottish Government's initial position on this petition was also provided by Food Standards Scotland, and can be found on the [petition's webpage](#).
7. Every petition collects signatures while it remains under consideration. At the time of writing, 1,353 signatures have been received on this petition.

## **Action**

The Committee is invited to consider what action it wishes to take.

### **Clerk to the Committee**

## Annexe A

# PE1997: Introduce mandatory braille labelling for food products sold in Scotland

## Petitioner

Fiona McDonald on behalf of Sight Scotland and Sight Scotland Veterans

## Date Lodged:

1 February 2023

## Petition summary

Calling on the Scottish Parliament to urge the Scottish Government to introduce new legal requirements on retailers to provide braille labelling on food products detailing the name of the item, and the item's use by or sell by date.

## Previous action

We contacted Stuart McMillan MSP, who lodged a [Parliamentary Question](#) on this issue. In response, the Minister for Public Health indicated food labelling legislation will be reviewed, with future policy expected to include consideration of mandatory braille labelling.

## Background information

Responsibility for labelling legislation has now moved to the Scottish and UK Governments.

Oban and District Access Panel, Disability Equality Scotland and Sight Scotland are calling on the Scottish Government to introduce new requirements on retailers to provide braille labelling on food products. Currently, braille labelling is only required for medicines, leaving braille users at a disadvantage to sighted shoppers when identifying food products they wish to purchase and use.

We see the shift in responsibility for labelling legislation as an opportunity for the Scottish Government to introduce a national policy which makes braille labelling into a statutory duty for businesses and retailers. This is an essential requirement for blind and partially sighted people, which would allow visually impaired individuals to safely identify, buy and use food items in both retailers and when at home.

Follow this link for more details on the campaign:

<https://inclusivecommunication.scot/braille-campaign>

## Annexe B

### Extract from Official Report of last consideration of PE1997 on 22 March 2023

**The Convener:** PE1997 has been lodged by Fiona McDonald on behalf of Sight Scotland and Sight Scotland Veterans. I understand that the petitioners are with us in the public gallery, and I welcome them. The petition calls on the Scottish Parliament to urge the Scottish Government to introduce new legal requirements on retailers to provide Braille labelling on food products detailing the name of the item and its use-by or sell-by date. The petitioners highlight that Braille labelling is currently required only for medicines, leaving Braille users at a disadvantage when identifying food products that they wish to purchase.

Responding on behalf of the Scottish Government, Food Standards Scotland states:

“As the body with policy responsibility for general food labelling FSS recognises that having access to adequate food information is essential to enable consumers to make informed choices when shopping for food.”

The response highlights the intention, following the exit from the European Union, for general food labelling legislation to be considered for review on a UK-wide basis. However, it is noted that the scope of the legislation is considerable and that any such review may be unlikely to take place in the foreseeable future. In the meantime, Food Standards Scotland has invited Sight Scotland and Disability Equality Scotland to meet it to improve its understanding of the needs of blind and partially sighted consumers.

We have also received a submission from the petitioners that notes that a meeting with Food Standards Scotland took place in early March. The petitioners tell us that the meeting provided an opportunity for them to offer clarity on the numbers of people living with sight loss in Scotland, while exploring the importance of offering a variety of accessible formats to match consumers' individual needs and preferences. The petitioners also mention that Food Standards Scotland is considering a public consultation that would be aimed at providing further insight on the impact of mandatory Braille labelling for food products that are sold in Scotland.

Do members have any suggestions? It is an interesting petition on an issue that had not occurred to me, until I read the detail of it, as being meaningful. I can see the practical issues that are associated with it but, nonetheless, I am pleased that meetings have taken place to at least explore matters further. What more might the committee do?

**Alexander Stewart:** There is no doubt that there is an opportunity to deal with the petition and seek some clarity as to what is taking place. You touched on the

consultation that is anticipated. It would be useful for the committee to write to Food Standards Scotland to ask it to update us on its plans for the consultation that is to take place with reference to the labelling of food products that are sold in Scotland having mandatory Braille labelling, and the timescale for that consultation to be carried out.

We should also write to the Food and Drink Federation Scotland to seek its views on the issues that the petitioners have raised, and specifically on the anticipated additional costs of adding Braille to labelling on food products. That will also give us an indication as to where this is going. In addition, it would be useful to find out from the Scottish Government what its views and feelings are on the process, because it has a role to play as well.

**The Convener:** I am interested in having a bit more understanding as well. The response from FSS says that a review is unlikely to happen in the foreseeable future, but what discussions are taking place about the process that might underpin a wider UK comprehensive review of food labelling? FSS refers to a review happening on a UK-wide basis, but I would like to understand whether the Scottish Government expects to proceed on that basis in this instance. What further information can it give us? We might ask it who in the UK Government is potentially leading on the matter. It may well be that, having received confirmation of that, we should write to the UK Government in due course to ask for its views on the process that would underpin a review. The proposed review is not as immediate a response as the petitioner is looking for, so I am very much in favour of Mr Stewart's suggestions.

Are there any other thoughts from colleagues? As there are none, I propose that we keep the petition open and write to the various organisations, the Scottish Government and potentially the UK Government on the basis that we have described. We will maintain contact with the petitioners so that they have an opportunity to feed in their responses to any responses that we receive, and we will have that information before us when we next consider the petition. Are we agreed?

**Members** *indicated agreement.*

# Annexe C

## Food Standards Scotland submission of 12 May 2023

### PE1997/C: Introduce mandatory braille labelling for food products sold in Scotland

Thank you for your letter of the 18th of April 2023 and for the opportunity to provide an update on any plans to conduct a public consultation on mandatory braille labelling for food products sold in Scotland and the indicative timescale for this.

The office of the Director-General for Health and Social Care at the Scottish Government has also been in touch following receipt of your letter of the 18th of April 2023 seeking information on what discussions have taken place to review general food labelling on a UK-wide basis and who in the UK Government is leading on this matter.

As Food Standards Scotland (FSS) has responsibility for the policies surrounding food composition, general food labelling and nutrition information in Scotland, please treat this letter as a response to both pieces of correspondence.

As the public body with policy responsibility for general food labelling FSS understands how important food information is to consumers and we are open to exploring what may be possible to support blind and partially sighted consumers.

We had a useful meeting with Sight Scotland, Oban and District Access Panel and Disability Equality Scotland on the 1st of March 2023, and the information received was a useful starting point to help us better understand the challenges faced by people living with sight loss with respect to food labelling matters. While FSS has no immediate plans to conduct a public consultation on policy options for the introduction of mandatory braille labelling on food products in Scotland, we will seek to build further evidence and knowledge to support developing potential options in this area, which may include a public consultation in due

course. However, we are unable to give a timescale for this or a guarantee of changing food labelling requirements at present.

FSS will however consider all the points raised, including what additional research and engagement with industry trade bodies and consumers may be needed.

The Committee will also be aware that any proposed changes to legal food labelling requirements need to be considered on a UK-basis, under the UK Food Compositional Standards and Labelling Common Framework. As such, we have brought the braille labelling petition to the attention of labelling policy officials in the Department for Environment, Food and Rural Affairs (Defra) and the Food Standards Agency (FSA) in Wales and Northern Ireland, and we will continue to seek to progress this issue on a four-nation basis.

We will also continue to engage with Sight Scotland, Oban and District Access Panel and Disability Equality Scotland to provide an update on any progress.

However, given the demands on FSS and other lead government departments as a consequence of work arising from the UK Government's Retained EU Law Bill and other commitments on labelling and standards matters, progress on braille labelling work is unlikely to be possible in the short term.

With regards your letter to the office of the Director-General for Health and Social Care, I can confirm that Defra are the lead UK Government department with policy responsibility for food labelling. While no specific timescale had been set to review general food labelling on a UK-wide basis, we understand that it had been the intention of the UK Government to undertake such a review following EU exit. However, Defra has instead opted to focus on a limited number of specific areas for review instead of a complete overhaul of food labelling, including precautionary allergen labelling (may contain statements), environmental information and animal welfare information. As such, we are not expecting the UK Government to press for a full review of the general food labelling requirements in the near term.



I hope the Committee finds this response helpful in considering the petition.

## Food and Drink Federation Scotland submission of 17 May 2023

### PE1997/D: Introduce mandatory braille labelling for food products sold in Scotland

Thank you for the opportunity to comment on the above petition.

The Food and Drink Federation is not aware of any industry analysis that has been conducted to investigate the cost and feasibility of introducing braille to food packaging.

The Committee may be interested in alternative technologies being trialled by food producers that are inclusive to non-braille sight loss and other groups who may struggle to read current labels which provide a wide range of information in different formats including large/accessible print and audio such as Navilens. (Please see [attached case study](#) below from Kelloggs UK)

The FDF encourages all UK authorities to recognise digital food information as a complementary means to both: repeat mandatory product information (e.g. in a more accessible digital format for certain consumers, such as larger font size, different language, or audio labels for blind and partially sighted people) and to provide additional voluntary product information. As consumer labelling policy develops, the regulatory framework UK should be adapted accordingly to reflect the core principles relating to the provision of digital food information, which in turn would also help reduce packaging volumes and wastage and mitigate some of the costs borne by the food industry when labels need updating.

If the committee would like further information, please do let me know.

## Attachment –

### **KELLOGG'S TO ROLL OUT CEREAL BOXES WITH WORLD-FIRST TECHNOLOGY FOR BLIND AND PARTIALLY SIGHTED**

- **All Kellogg's cereal boxes to be adapted following a successful trial**
- **The new code on its packaging will allow a smartphone to detect and playback labelling and allergen information to the user**

Kellogg's is today announcing that following a successful trial, new world-first technology will be permanently added to all of its cereal boxes to make them accessible to blind and partially sighted people.

Important information on food packaging, such as allergen details can often be in print that's difficult for blind or partially sighted people to read. The new boxes will allow a smartphone to easily detect a unique on-pack code and playback labelling information to the shopper with sight loss.

The company will change all its cereal packaging, beginning in 2022 with the first accessible boxes of Special K appearing on shelf in January. The idea came to life when Kellogg's met with children from St Vincent's in 2019, a specialist school in Liverpool for children with sensory impairment. It was the pupil's insight that inspired the business to look for solutions.

Kellogg's also hopes that by sharing its experience with other brands there is an opportunity to make the supermarket shelves more accessible for people with sight loss so they can shop more independently and access information from a range of packaging.

This announcement comes after a successful UK trial last year in partnership with Co-op, on Kellogg's Coco Pops boxes. Evaluation of the

pilot by charity Royal National Institute of Blind People (RNIB) showed that 97 percent of the participants agreed that they would like to see more of these accessibility features available on grocery packaging in the future.

Unlike other types of printed codes, the new technology, called NaviLens, includes high contrasting coloured squares on a black background. Users do not need to know exactly where the code is located to scan it.

It allows smartphones\* to pick up the on-pack code from up to three metres distance when a blind or partially sighted shopper points their device in the direction of the cereal box. This then alerts the phone and the shopper can choose to have the ingredients, allergen and recycling information read aloud to them – as well as reading it on their device using accessibility tools.

The technology is currently used across Barcelona, Madrid and Murcia city's transport systems, making the cities easier to navigate for thousands of visually impaired citizens.

**Chris Silcock, head of Kellogg's UK, said:** "Over two million people in the UK live with sight loss\*\* and are unable to simply read the information on our cereal boxes. As a company focused on equity, diversity and inclusion we believe that everyone should be able to access important and useful information about the food that we sell.

"That's why, starting next year, we are adding new technology to all of our cereal boxes. I am proud that Kellogg's will be the first company in the world to use NaviLens on packaging. We know it's important that all packaging is accessible for the blind community to enable them to make

shopping easier, so we will share our experience with other brands who want to learn more.”

**Javier Pita, CEO of NaviLens, the start-up company that created the technology commented:** “The incorporation of the NaviLens codes onto food packaging is a positive step towards a more inclusive and accessible shopping experience for the visually impaired. This allows people with sight loss to shop more independently and make their own food choices.”

**Marc Powell, strategic accessibility lead at RNIB, said:** “This announcement from Kellogg’s is a real game changer within the packaging world. It marks a significant step-change in how big brands can put accessibility at the forefront of design and packaging decisions and be a catalyst for change.

“Important information on packaging can often be in very small print, making it difficult or impossible for people with sight loss to read. Changes like this can provide blind and partially sighted people with vital information for the very first time, giving us the same freedom, independence and choice as sighted customers.

“Designing packaging so that it works for everyone makes complete sense and we hope that other brands will follow Kellogg’s lead in making packaging information more accessible.”

**Notes to Editor:**

\*Using the free NaviLens App

\*\*According to the NHS

**About NaviLens**

NaviLens is a printed code that can be scanned, using a smartphone camera and a free app, to hear what information is stored within them. The tags are made up of high-contrasting coloured squares on a black background, similar in appearance to a QR code. Unlike with QR codes, users don't need to know exactly where a tag is to be able to read it. A tag measuring 20 x 20 centimetres (7.9 x 7.9 inches) can be detected from 12 meters (40 feet) away, even in motion and without having to focus the phone's camera.

As users sweep their environment with a smartphone, audio cues allow them to find and centre the tag in the phone's field of view. A shake of the wrist prompts the details contained within the tag to be read out. The information can vary depending on where the user is standing in relation to the tag, and can be programmed in multiple languages, with the phone automatically selecting its native language.

NaviLens is created by Neosistec, in collaboration with the Mobile Vision Research Lab at the University of Alicante.

## Petitioner submission of 5 July 2023

### PE1997/E: Introduce mandatory braille labelling for food products sold in Scotland

We want to thank Food Standards Scotland for their letter dated the 12 May 2023, updating us on the progress of adding braille labels to food packaging in Scotland. We appreciate their response and perspective, and understand that significant progress is unlikely to be made in the short term. We understand that the issue needs to be considered on a UK-wide basis with the UK Government, and want to thank them for taking the petition to the attention of the Department for Environment, Food and Rural Affairs (Defra), and the Food Standards Agency (FSA) in Wales and Northern Ireland. We also understand that they need to prioritise which different parts of food labelling to develop.

We would, however, like to reiterate the importance of food products being accessible and safe for blind and partially sighted people, as well as the difference that having braille labelling on food products would make. Our campaign group met recently to discuss the response and in order to develop our campaign further, we are soon to be putting out a poll to our various audiences to get feedback from individuals on the general accessibility of food packaging, including braille. We hope to

gather a bank of real-life experiences to help support the call going forward. We will continue to campaign to ensure that braille labels do one day, hopefully soon, exist on food products across the UK. There is a need for this to happen and we know that the need can be met, we also know that it is not expensive. The pharmaceutical industry, one or two food manufacturers and at least one cosmetic company that we are aware of, have provided braille labelling on their products which demonstrates that it is possible.

We would also like take this opportunity to raise our wider work regarding accessible packaging, issues which sit alongside braille labelling. As a campaign group, we repeatedly hear from people with visual impairment about inaccessible packaging which makes it difficult, and sometimes impossible, to identify and use food products. We find small inaccessible print, busy packaging with lots of text, and the absence of colour contrast to repeatedly come up as issues. The use of NaviLens, as well as QR codes which can be scanned to access information, are helpful but need to be used in combination with techniques such as large print, simple designs, colour contrast and clear fonts to ensure packaging is truly accessible for all.

We would be very happy to meet Food Standards Scotland, preferably online, to discuss the importance of accessible packaging further.

It would be great if Food Standards Scotland could keep us up to date with any developments that occur regarding braille labelling and accessible packaging, and we hope to speak to them soon.

## Petitioner submission of 3 November 2023

### PE1997/F: Introduce mandatory braille labelling for food products sold in Scotland

We would like to take this opportunity to provide the Committee with further information to aid with their consideration of our petition. In August 2023, our campaign group launched a survey to get feedback from individuals on the general accessibility of food packaging, including

braille. The results from this survey portray an outstanding need for food package labels to be more accessible.

**76% of respondents saying that current labels do not meet respective accessibility requirements**

Braille users who responded to the survey highlighted the importance of introducing legislation which will make braille labels on food products mandatory. Respondents highlighted challenges they face in their daily lives when identifying food products in their homes. A key point to note is that respondents highlighted how braille would improve the safety of people with visual impairment, allowing them to identify which products are safe to consume.

**“I read braille, and this is simply a no-brainer. It would improve inclusivity and help food manufacturers to reach a wider audience.”**

The survey highlighted something that we are told frequently: food labels are inaccessible and difficult to read. This is due to text being too small, poor colour contrast, and inconsistent design. We note that food labels contain vital information – not just best before and use by dates, allergen, and nutritional information. It can be argued that braille labelling is in fact most useful when retrieving and storing food items so that a person can easily identify a product instantly. In the current cost-of-living crisis, this is especially important to reduce food waste if a product is opened accidentally.

Assistive technology, including QR codes and apps, such as NaviLens, were also mentioned in responses as helpful forms of technology that can improve accessibility possibilities. It was noted, however, that assistive technology should be seen to complement and not be a substitute for braille or other accessible formats.

Various barriers such as financial constraints and devices which lack the necessary accessibility features to use QR codes were also highlighted. In 2022, [The European Commission](#) launched a review into accessible labelling whereby it was pinpointed that the use of only digital means to provide food information, such as QR codes, apps, and website links, isolates people without internet access, or without digital skills. The European Commission concluded that braille information is essential alongside digital sources to be truly accessible for all people with visual impairment.

We argue therefore, again, that digital information sources need to be used alongside braille. We're calling on you to take into account the

findings we've shared from both the European Commission's report and the survey we conducted when considering our petition. Food Standards Scotland stated in correspondence with us that they will seek to build evidence and knowledge in this area and, in the future, may run a public consultation to gather further views on braille labelling on food products in Scotland. We call on you to encourage this consultation, and to bring it forward.

Braille labelling on pharmaceutical products, which was implemented a number of years ago, has provided enormous benefits and augmented the very important issue of safety for visually impaired people; we are passionate and committed that this statutory requirement should be extended to food products.

We trust the Committee finds this information useful when considering our petition and would be happy to share our report about accessing labelling if of interest.

With many thanks for your attention to this,

Sight Scotland and Sight Scotland Veterans  
Disability Equality Scotland  
Oban and District Access Panel