

Citizen Participation and Public Petitions Committee
Wednesday 25 September 2024
14th Meeting, 2024 (Session 6)

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

Introduction

Petitioner Fiona McDonald on behalf of Sight Scotland and Sight Scotland Veterans

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.

Webpage <https://petitions.parliament.scot/petitions/PE1997>

1. [The Committee last considered this petition at its meeting on 22 November 2023.](#) At that meeting, the Committee agreed to write to the UK Department for Environment, Food and Rural Affairs (DEFRA), and Food Standards Scotland.
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 written submissions from Food Standards Scotland, DEFRA, and the petitioner which are set out in **Annexe C**.
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. [Food Standards Scotland provided the Scottish Government's initial position on this petition on 1 February 2023.](#)
7. Every petition collects signatures while it remains under consideration. At the time of writing, 1,525 signatures have been received on this petition.

Action

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

Clerks to the Committee
September 2024

Annexe A: Summary of petition

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 November 2023

The Convener: PE1997, which is on the introduction of Braille labelling for food products that are sold in Scotland, has been lodged by Fiona McDonald on behalf of Sight Scotland and Sight Scotland Veterans. I believe that we have the petitioners in the public gallery today. 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 the item's use-by or sell-by date.

We last considered the petition on 22 March, when we agreed to write to Food Standards Scotland, the Food and Drink Federation Scotland and the Scottish Government. Members will have noted that the response from Food Standards Scotland also covers the issues that we raised directly with the Scottish Government.

Food Standards Scotland states that it

“has no immediate plans to conduct a public consultation on policy options for the introduction of mandatory braille labelling”,

but that it will continue to build the evidence base in that area. The response also indicates that, while it is “unlikely” that progress on Braille labelling work will be made in the short term, FSS has brought the petition to the attention of the UK Government Department for Environment, Food and Rural Affairs.

The Food and Drink Federation draws our attention to

“alternative technologies being trialled by food producers”

that would improve accessibility for consumers. It also “encourages” the recognition of digital food information, which can be used to provide complementary detail and repeat mandatory product information.

We have also received two submissions from the petitioners, which emphasise

“the importance of food products being accessible and safe for blind and partially sighted people”.

In particular, they note that, while the use of QR codes is helpful, the technology needs

“to be used in combination with”

other techniques to ensure that packaging is fully accessible for all.

The petitioners' most recent submission shares results of their survey, which gathered feedback on the general accessibility of food packaging. Interestingly, 76 per cent of respondents said that current labels do not meet respective accessibility requirements.

There is quite interesting feedback from the various parties in relation to the petition. Do members have any suggestions? Perhaps we could follow up on the Food Standards Scotland approach to the UK Department for Environment, Food and Rural Affairs.

David Torrance: I wonder whether the committee would consider writing to the UK Department for Environment, Food and Rural Affairs to ask what consideration it has given to the introduction of mandatory Braille labelling on food products across the UK, and to seek clarification on whether the UK Government will carry out a full review of general food labelling requirements.

I also wonder whether the committee would consider seeking an update from Food Standards Scotland on its work to build an evidence base in the area and on the recommendation that it launches a public consultation to gather views on Braille labelling on food.

Fergus Ewing: I support those recommendations. Perhaps in the course of drafting the letters to the UK DEFRA and to Food Standards Scotland, we could make reference to the material that the petitioners have drawn attention to regarding the European Commission's work on launching a review into accessible labelling, so that we can be informed by what the European Union is doing. Plainly, that is bound to have an enormous implication. If the EU makes new labelling regulations, all the major food producers will probably comply with those. That would leave the UK as the odd man out, if I may coin a phrase.

The Convener: You may. Thank you, Mr Ewing. Are members content to incorporate all those suggestions?

Members *indicated agreement.*

The Convener: We will keep the petition open and we will pursue it in the ways that we have just agreed.

Annexe C: Written submissions

Food Standards Scotland submission of 20 December 2023

PE1997/G: Introduce mandatory braille labelling for food products in Scotland

Thank you for your letter of the 24 November 2023 and for the opportunity to provide an update on our work to build an evidence base.

As you are aware we had a useful meeting with Sight Scotland, Oban and District Access Panel and Disability Equality Scotland earlier in the year, which 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. Since this time, we have had some follow up communication with Sight Scotland, including the report from their recent Braille and Accessible Food Labelling Survey.

We have also had initial discussion with internal social science and research colleagues, and we are looking to use all available relevant science, evidence and research to inform our thinking on the matter including the European Commission's review into accessible labelling as highlighted by the Committee. We are also continuing to develop our thinking around stakeholder engagement. The next step would be to seek views from those businesses or organisations representing businesses with experience in providing information in braille on their food and/or non-food products.

FSS acknowledges the importance of food information to all consumers. While it remains the case that due to current workloads no timescale can be set at the moment, our intention is to continue to work towards building further evidence and knowledge on the practicalities and costs to help develop potential options in respect of braille food labelling. We note the Committee's recommendation to consult, and consultation would be an important part of developing any proposals. We will continue to discuss this on a UK basis with the Department for Environment, Food and Rural Affairs (Defra) and the Food Standards Agency (FSA) in Wales and Northern Ireland as we are required to under the UK Food Compositional Standards and Labelling Common Framework.

Going forward, we will continue to keep in touch with Sight Scotland, Oban and District Access Panel and Disability Equality Scotland as our plans develop.

I hope the Committee finds this response helpful.

Department for Environment, Food and Rural Affairs (DEFRA) submission of 7 March 2024

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

Thank you for forwarding for comment the petition to introduce mandatory information in braille for products sold in Scotland. I am answering this from the perspective of the food labelling team in Defra and I apologise for having missed your first deadline for response. Thank you for your patience. It may be useful for

you to know that there is a Common Framework for Food Composition, Standards and Labelling, through which cross-UK food information policies are discussed with the aim of avoiding or managing divergence in this policy area and that this subject will be discussed through the framework process.

At present, the UK Government has no immediate plans to initiate a public consultation on policy for the introduction of mandatory braille labelling on food products. However, we are aware of moves by some retailers to provide information on food in braille format, and we are interested in seeing how this works.

The UK maintains high standards on the information that is provided on food labels, whether that be mandatory or voluntary, so that consumers can have confidence in the food that they buy. All food sold on the UK market must comply with food labelling rules. The fundamental principle of food labelling rules is that information provided to the consumer must not mislead and must enable the safe use of food.

The availability and accessibility of essential food information to all consumers is vitally important. It is already a requirement that food information must be easily visible, clearly legible, and where appropriate indelible, in addition to there being a required minimum font size for mandatory information.

Before launching a public consultation on the introduction of mandatory braille labelling on food products, many factors must be considered. For example, we must consider the practical viability of braille labelling on a diverse range of packaging formats, and the costs and effectiveness of the use of braille labelling relative to that of using different methods to provide information to people with visual impairments.

We know there are exciting possibilities, including the use of mobile device apps and QR codes via which consumers with visual impairments may be able to access not only the basics, but the full range of information available on the label, as well as additional information provided via the App or QR code. We note that the European Commission's review into accessible labelling concluded that digital means such as the above could be one of the ways used to improve accessibility of food information to visually impaired individuals. This is clearly an area of interest with potential and one with which we will be engaging in the future through the Common Framework for Food Composition, Standards and Labelling.

Petitioner written submission, 2 April 2024

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

We note in [DEFRA's submission of 7 March 2024](#) that

“the UK maintains high standards on the information that is provided on food labels, whether that be mandatory or voluntary, so that consumers can have confidence in the food that they buy”

and

“it is already a requirement that food information must be easily visible, clearly legible, and where appropriate indelible, in addition to there being a required minimum font size for mandatory information.”

We are concerned that current practices fall short of these standards, given the difficulties blind and partially sighted people are experiencing when trying to identify items and their ingredient information. We would be grateful if DEFRA could advise what the minimum font size for mandatory information currently is? How is this monitored to ensure compliance? What are the consequences on retailers and manufacturers if they don't meet these standards?

We are eager to highlight the European Commission's review into accessible labelling found that assistive technology, including QR codes and apps can improve accessibility possibilities, however, that assistive technology should be seen to complement and not be a substitute for braille or other accessible formats. It is our view that digital means alone are not sufficient to guarantee the accessibility of food information to visually impaired individuals. This is evidenced in the legislation to require the pharmaceutical industry to provide braille on medicinal products. Indeed, the issue of braille labelling on food items could have been addressed at the same time.

We believe it would be prudent for DEFRA to conduct a public consultation on the introduction of braille labelling to gather views from both consumers and retailers and manufacturers. If the practical viability of braille labelling and the costs associated must be considered before a consultation is launched, then we strongly urge DEFRA to undertake this research.

The Committee may wish to note we are due to meet with Food Standards Scotland in the near future and will be raising these points, including the suggestion for a public consultation, with them too.

With many thanks for your attention to this.

Petitioner written submission, 11 September 2024

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

Following our written submission of 2 April 2024, which responded to DEFRA's submission of 7 March 2024, we have not yet received a reply from DEFRA to the questions posed regarding:

1. What the minimum font size for mandatory information currently is?
2. How is this monitored to ensure compliance?
3. What are the consequences on retailers and manufacturers if they don't meet these standards?

These questions follow the statement by Department for Environment, Food & Rural Affairs (DEFRA) that stated: “the UK maintains high standards on the information

that is provided on food labels, whether that be mandatory or voluntary, so that consumers can have confidence in the food that they buy” and “it is already a requirement that food information must be easily visible, clearly legible, and where appropriate indelible, in addition to there being a required minimum font size for mandatory information.”

We also await a response from DEFRA regarding plans to conduct a public consultation on the introduction of braille labelling to gather views from both consumers and retailers and manufacturers. As previously noted, if the practical viability of braille labelling and the costs associated must be considered before a consultation is launched, then we ask DEFRA to confirm if they will undertake this research, and offer our full support to take this forward.

We were pleased to learn that Food Standards Scotland (FSS) are holding a labelling review, but surprised and very disappointed that braille labelling on food products has not been included. We believe this is a missed opportunity to recognise and explore the different accessibility needs of people with sight loss. There are many challenges that people with sight loss experience on day-to-day basis, yet simple solutions can often reduce challenges – including alternative communications such as braille. Blind and partially sighted people should have the right, the dignity and be able to safely identify quickly and easily the food products, which they purchase and use. As such, we would like to request that braille labelling on food products is considered by Food Standard Scotland as part of their forthcoming review.

Evidence of the need for and the benefit of braille labelling on food products has been gathered through a survey and case studies. The pharmaceutical industry, the Co-op, and Arran whisky, who place braille labels on products, have provided the model that demonstrates that it is feasible for braille labelling to be done.

Furthermore, we would like to highlight to the Committee that we are meeting with the working group on braille of the European Blind Union in early October to discuss approaches taken in Europe and internationally to braille labelling and accessible food information. We would be pleased to report back to the Committee with these findings which we believe will give greater clarity, scope, and approaches to how braille labelling on food products can be made a legal requirement and adopted in Scotland and across the UK.

The number of signatures to the petition has increased since it was last reviewed by the Committee (over 1500), demonstrating continued public support. Considering the above, we ask the Committee to keep the petition open and to request further assistance and responses from DEFRA and FSS.

With many thanks to the Committee for its attention to these matters.