

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

Petitioner written submission, 11 September 2024

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.